

INDEPENDENT AUDIT REPORT

Curt Boehme
Chief of Police
Lino Lakes Police Department
640 Town Center Pkwy.
Lino Lakes, MN 55014

Dear Chief Boehme:

An independent audit of the Lino Lakes Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on August 18, 2026. The objective of the audit was to verify Lino Lakes Police Department's compliance with Minnesota Statutes §§13.825 and 626.8473.

Data elements the audit includes:

Minnesota Statute §13.825

- Data Classification
- Retention of Data
- Access by Data Subjects
- Inventory of Portable Recording System Technology
- Use of Agency-Issued Portable Recording Systems
- Authorization to Access Data
- Sharing Among Agencies

Minnesota Statute §626.8473

- Public Comment
- Body-worn Camera Policy

The Lino Lakes Police Department is located in Anoka County, Minnesota and is authorized for twenty-eight (28) peace officers. During the audit period, the Lino Lakes Police Department utilized Panasonic Arbitrator body-worn cameras and software and Axon body-worn cameras. Arbitrator BWC data was stored on a local file server hosted of Metro-Inet. Axon BWC data is stored and managed in cloud-based Evidence.com. The audit covers the time period September 1, 2024, through August 31, 2026.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Lino Lakes Police Department BWC data is presumptively private. All data collected during the audit period is classified as private or nonpublic data. The Lino Lakes Police Department had no instances of the discharge of a firearm by a peace officer, use of force that resulted in substantial

bodily harm, requests from data subjects for the data to be made accessible to the public, or court orders directing the agency to release the BWC data to the public.

No discrepancies noted.

Audit Requirement: Retention of Data

Determine that the data collected by BWC's are appropriately retained and destroyed in accordance with statutes.

The Lino Lakes Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency specified retention periods in the Arbitrator 360° Back-End Client and Evidence.com. Either during, or at the conclusion of a BWC recording, an Arbitrator or Evidence.com classification or category is assigned. Each classification or category has an associated retention period. Upon reaching the retention date, data is systematically deleted. Deletion of Axon BWC data is captured in the Evidence.com audit trail.

A server log report of consisting of all BWC data collected and deleted by Arbitrator BWCs and an Evidence Created Report consisting of all BWC data collected and deleted by Axon BWCs during the audit period were produced. Randomly selected records from the server log report and records from the Evidence Created Report were reviewed, and the date and time the data was created was verified against the deletion date. Each of the records were deleted or maintained in accordance with the record retention schedules. All records were maintained for at least the minimum ninety (90) days required by statute. Randomly selected Evidence.com audit trail reports were verified against the Evidence Created Report, and each record was deleted or maintained in accordance with the record retention schedule.

Active Arbitrator BWC data is accessible in the Arbitrator 360° Back-End Client. The server log maintains a listing of all active and deleted BWC data with associated meta data.

Sergeants monitor proper categorization of BWC data to ensure data are appropriately retained and destroyed.

No discrepancies noted.

Audit Requirement: Access by Data Subjects

Determine if individuals who are the subject of collected data have access to the data, and if the data subject requests a copy of the data, other individuals who do not consent to its release must be redacted.

BWC data is available to data subjects and access may be requested by submission of a Request for Information form. During the audit period, the Lino Lakes Police Department had received no requests to view BWC data but did receive and fulfill requests for copies of BWC data from data subjects. Data subjects who had not consented to release of the data were redacted. A copy of redacted videos are stored in the redaction software. A notation is added to the Request for

Information forms documenting that data was redacted and the identity of the data subject was verified. Request for Information forms are retained, and the request is documented in an Excel spreadsheet.

No discrepancies noted.

Audit Requirement: Inventory of Portable Recording System Technology

Determine the total number of recording devices owned and maintained by the agency; a daily record of the total number of recording devices actually deployed and used by officers, the policies and procedures for use of portable recording systems by required by section 626.8473; and the total amount of recorded audio and video collected by the portable recording system and maintained by the agency, the agency's retention schedule for the data, the agency's procedures for destruction of the data, and that the data are available to the public.

Lino Lakes Police Department's BWC inventory consists of thirty-one (31) devices. An inventory report produced from Evidence.com detailed the total number of recording devices owned and maintained by the agency. The inventory included the device model, serial number, device name, officer assigned to the device, date of last upload, device status, error status, firmware version, warranty date, date last docked, and camera state.

The Lino Lakes Police Department BWC policy governs the use of BWCs by peace officers while in the performance of their duties. The policy requires officers to be equipped with a BWC and to ensure the BWC is in good working order prior to going into service. Peace officers noting a malfunction during testing, or at any other time, are required to promptly report the malfunction to their supervisor and obtain a functioning device as soon as reasonably practicable. The policy requires officer to wear the recorder at or above the mid-line of the waist in a position that maximizes the BWC's capacity to record video of the officer's activities.

Peace officers were trained on the use of BWC's during implementation. Officers were trained on the use of Axon BWCs by Axon-trained trainers. Newly hired officers are trained as part of their field training program.

Officers working on randomly selected dates and randomly selected calls for service were verified against the Evidence Created Report and confirmed that BWCs are being deployed and officers are wearing and activating their BWCs. The total number of BWC videos created per quarter shows that BWC data is being consistently collected.

The Arbitrator server log report summarizes the total amount of Arbitrator BWC data created, deleted, and stored/maintained. Evidence.com queries and the Evidence Created Report detail the total amount of Axon BWC data created, stored/maintained, and deleted.

The Lino Lakes Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency specified retention periods in Arbitrator 360° Back-End Client and Evidence.com. BWC data is fully deleted upon reaching its scheduled deletion date. Metadata and audit trails are maintained in Evidence.com after deletion of BWC audio and video.

BWC data is available upon request, and access may be requested by submission of a Request for Information form.

No discrepancies noted.

Audit Requirement: Use of Agency-Issued Portable Recording Systems

Determine if peace officers are only allowed to use portable recording systems issued and maintained by the officer's agency.

The Lino Lakes Police Department's BWC policy states that officers are prohibited from using personally owned recording devices while on-duty without the express consent of the Shift Sergeant.

No discrepancies noted.

Audit Requirement: Authorization to Access Data

Determine if the agency complies with sections 13.05, Subd. 5, and 13.055 in the operation of portable recording systems and in maintaining portable recording system data.

Sergeants conduct quarterly random reviews of BWC data to ensure BWCs are being utilized in compliance with policy and that data is properly categorized.

Nonpublic BWC data is only available to department employees whose work assignment reasonably requires access to the data. User access to BWC data is managed by the assignment of roles and permissions in Arbitrator 360° Back-End Client and Evidence.com. Permissions are based on staff work assignments. Roles and permissions in Evidence.com are administered by a Sergeant. Arbitrator and Evidence.com are password protected, and Evidence.com requires dual authentication.

The agency's BWC policy governs access to BWC data. Law enforcement personnel are authorized by the Chief of Police to access nonpublic BWC data so long as the access is for a legitimate specified law enforcement purpose and in compliance with policy and pursuant to the Minnesota data practices act. Access to BWC data is captured in the audit trail. The BWC policy states that any member who accesses or releases recordings without authorization may be subject to discipline.

When BWC data is deleted from Arbitrator 360° Back-End Client and Evidence.com, its contents cannot be determined. Lino Lakes Police Department has had no security breaches. A BCA CJIS security audit was conducted in April of 2024.

No discrepancies noted.

Audit Requirement: Sharing Among Agencies

Determine if nonpublic BWC data shared with other law enforcement agencies, government entities, or federal agencies is in accordance with statute.

The Lino Lakes Police Department's BWC and Records Maintenance and Release policies govern sharing of BWC data with other governmental entities and agencies. Law enforcement agencies, government entities, or federal agencies seeking access to BWC data are required to submit a written request for the data. Sharing of BWC data is documented in an Excel spreadsheet and an Evidence.com Sharing Audit Report.

No discrepancies noted.

Audit Requirement: Biennial Audit

Determine if the agency maintains records showing the date and time the portable recording system data were collected, the applicable classification of the data, how the data are used, and whether data are destroyed as required.

The Arbitrator 360° Back-End Client and server log report and Evidence.com and the Evidence Created Report document the date and time portable recording system data was collected and deleted. All BWC data collected during the audit period is classified as private or nonpublic data. The audit trails and an Excel spreadsheet document how the data are used and shared.

No discrepancies noted.

Audit Requirement: Portable Recording System Vendor

Determine if portable recording system data stored in the cloud, is stored in accordance with security requirements of the United States Federal Bureau of Investigation Criminal Justice Information Services Division Security Policy 5.4 or its successor version.

Lino Lakes Police Department Arbitrator BWC data is stored on a file server hosted by Metro-Inet. The server is located in a secure area and requires dual authentication. The server is backed up every twelve (12) hours.

Axon BWC data is stored in the cloud. An Axon CJIS Compliance White paper outlines the specific security policies and practices for Evidence.com and how they are compliant with the CJIS Security Policy. Axon has signed the CJIS Security Addendum in all states and has performed statewide CJIS-related vendor requirements in Minnesota. Axon has incorporated the CJIS Security Addendum by reference into the Axon Master Services and Purchase Agreement. Axon maintains signed CJIS Security Addendum certification pages for Axon personnel. Authorized Axon personnel are required to complete Level 4 CJIS Security Training upon assignment and biennially thereafter.

Axon Enterprise, Inc., Evidence.com/Axon Cloud Ecosystem appears on the BCA Vendor Screening Program list of approved and screened vendors and is vetted in accordance with the security requirements of the United States Federal Bureau of Investigation Criminal Justice Information Services Division Security Policy.

No discrepancies noted.

Audit Requirement: Public Comment

Determine if the law enforcement agency provided an opportunity for public comment before it purchased or implemented a portable recording system and if the governing body with jurisdiction over the budget of the law enforcement agency provided an opportunity for public comment at a regularly scheduled meeting.

The Lino Lakes Police Department solicited public comment prior to purchase and implementation of the body worn camera program. Public comment was solicited on the department's Facebook page on November 29, 2017. The Lino Lakes City Council held a public hearing at their December 11, 2017, meeting. The body worn camera program was implemented March 18, 2018.

No discrepancies noted.

Audit Requirement: Body-worn Camera Policy

Determine if a written policy governing the use of portable recording systems has been established and is enforced.

The Lino Lakes Police Department established and enforces a BWC policy. The BWC policy was compared to the requirements of Minn. Stat. § 626.8473. The policy includes all minimum requirements of Minn. Stat. § 626.8473, Subd. 3(b). The BWC policy is posted on the agency's website.

No discrepancies noted.

This report was prepared exclusively for the City of Lino Lakes and Lino Lakes Police Department by Lynn Lembcke Consulting. The findings in this report are impartial and based on information and documentation provided and examined.

Dated: September 13, 2026

Lynn Lembcke Consulting



Lynn Lembcke