



Office of City Clerk
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December 23, 2021

Senator Warren Limmer, Chair
Legislative Coordinating Commission Subcommittee on Data Practices
3221 Minnesota Senate Building
95 University Ave. W.
St Paul, MN 55115

Representative John Lesch, Vice Chair
Legislative Coordinating Commission Subcommittee on Data Practices
563 State Office Building
100 Rev. Dr. Martin Luther King, Jr. Blvd.
St. Paul, MN 55155

Sally Olson, Commission Administrator
Legislative Coordinating Commission Subcommittee on Data Practices
72 State Office Building
100 Rev. Dr. Martin Luther King, Jr. Blvd.
St. Paul, MN 55155

Enclosed please find the Biennial Body Worn Camera (BWC) Audit Report, for the period August 19, 2021, to October 6, 2021; and the Automated License Plate Reader (ALPR) Audit Report, for the period August 16, 2021, to October 8, 2021.

Sincerely,

A handwritten signature in black ink that reads "Peggy Menshek".

Peggy Menshek
City Clerk's Office

cc: Legislative Reference Library, refdesk@lrl.leg.mn
Ryan Patrick, Director of Minneapolis Internal Audit

Enclosures: Certificate of Audit Summary Report by Governing Body
Portable Recording Systems Audit
Automated License Plate Reader Audit

CERTIFICATE OF AUDIT SUMMARY REPORT

BY GOVERNING BODY

(Pursuant to Minnesota Statute 13.825, subd. 9)

STATE OF MINNESOTA

County of Hennepin

TO THE LEGISLATIVE COORDINATING COMMISSION SUBCOMMITTEE ON DATA PRACTICES (FORMERLY LEGISLATIVE COMMISSION ON DATA PRACTICES AND PERSONAL DATA PRIVACY):

PLEASE TAKE NOTICE, That the undersigned chief clerical officer of the City of Minneapolis DOES HEREBY CERTIFY, that in compliance with the provisions of Minnesota Statute 13.825, portable recording systems, Wildcard Corporation conducted an audit of the Minneapolis Police Department's Body Worn Camera/Automated License Plate Reader system to ensure compliance with state laws in accordance with Minnesota Statute 13.825, and was presented to the City Audit Committee on December 6, 2021, and published on December 6, 2021. The scope of the audit covers August 16, 2021, to October 8, 2021.

A copy of the Biennial Audit of the Minneapolis Police Department Body Worn Camera/Automated License Plate Reader system Audit Summary Reports are hereto annexed and made a part of this certificate by reference.



Signed: _____

Casey Joe Carl, City Clerk
City of Minneapolis
(Official designation of officer)

The City of Minneapolis

Portable Recording Systems Audit

Abstract

This document has been drafted to provide a Portable Recording Systems Audit to the City of Minneapolis.



Point of Contact: Wildcard Corp. Cybersecurity Team security@wildcardcorp.com

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Assessment Team

Justin Moravec, Director of Cybersecurity
Dani Cronic, Lead Cybersecurity Analyst
Derek Rodriguez, Cybersecurity Analyst

Report Date: 25 October 2021
Assessment Start Date: 19 August 2021
Assessment End Date: 6 October 2021

Executive Summary

Wildcard was contracted by the City of Minneapolis to conduct an audit of the policies and procedures regarding Portable Recording Systems (PRS) a.k.a. Body Worn Cameras (BWC) in accordance with MN State Statute 13.825 Subd. 9 and all other related sections and subdivisions. In our evaluation, with the storage and deletion requirements addressed in policy, we have determined the City of Minneapolis to be in compliance.

The following resources were utilized:

- evidence.com account list (name, status [active, inactive], role, last login date)
- MPD Policy and Procedure
- evidence.com audit trails
- Interviews with users of BWCs and evidence.com
- A demo of evidence.com
- Interviews with City IT

Scope

The scope of this audit is defined in MN State Statute section 13.825, subd. 9 and all referenced subdivisions and sections.

Findings

Non-Axon Storage

While deletion of data in evidence.com is assumed to be done securely by Axon, copies of data have been downloaded for various reasons. BWC video data has been downloaded and stored on work computers for transcoding. Data has also been downloaded and stored in the shared 'M' drive by OPCR. After we reported these findings to the City of Minneapolis, they adjusted their policies and procedures to ensure proper deletion of files in accordance with 13.05 subd. 5, sub-section (b). The new policy restricts storage of BWC data to only evidence.com and CJIS-compliant cloud storage. Additionally, it states that all BWC data currently stored on work computers and the 'M' drive must be completely erased.