



Marty Kelly
Goodhue County Sheriff

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To: Honorable Goodhue County Commissioners
From: Sheriff Marty Kelly
Re: Body Worn Camera Audit
Date: 11-3-2026

Dear Honorable Goodhue County Commissioners,

The Goodhue County Sheriff's Office has completed the statutorily required biennial audit of the Body-Worn Camera (BWC) program. The audit was conducted in accordance with Minnesota Statutes and reviewed all operational, documentation, and policy components related to the use of body-worn cameras.

The audit concluded that the Sheriff's Office BWC policy and program meet all requirements of Minnesota law. Several minor corrections and clarifications were recommended by the auditors. These recommendations have been reviewed, and the Sheriff's Office has adopted the appropriate revisions to ensure continued compliance and best practices.

The full audit report is included for your review.

The BWC program remains an important component of our commitment to transparency, accountability, and community trust. We will continue to monitor the program and implement improvements as needed.

In service,

Sheriff Marty Kelly

OFFICE OF THE GOODHUE COUNTY SHERIFF

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Goodhue County Sheriff's Office, Red Wing, Minnesota

2026 Body-Worn Camera Audit

Executive Summary Report

October 2, 2026



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Goodhue County Sheriff's Office
Chief Deputy Jonathan Huneke
430 West 6th Street
Red Wing, Minnesota
651.267.2703

We conducted an audit of the body-worn camera program, (further known as BWC) for the period of **08/28/2024** through **08/19/2026**. The purpose of this audit is to confirm compliance with Minnesota Statutes §626.8473 and §13.825 relating to Body Worn Cameras.

Audit areas mandated by MS §626.8473:

- Public Comment
- Body-Worn Camera Policy

Audit areas mandated by MS §13.825:

- Data Classification
- Retention of Data
- Access by Data Subject(s)
- Inventory of BWC Technology
- Use of Agency-Issued BWC
- Authorization to Access Data
- Sharing among agencies
- Biennial Audit
- Notification to BCA
- BWC Vendor (agreement)

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The procedures and findings are as follows:

1. Public Comment

Determine if an opportunity for public comment was given. MS §626.8473 subd. 2.

Findings

Notice was given of opportunity for public comment on 03/27/2024. This notice was published in Kenyon Leader. See APPENDIX A.

2. BWC Policy

Determine a written policy governing BWC use which is in accordance with Minnesota Statute §626.8473 subd. 3.

Findings

We obtained from the Goodhue County Sheriff's Office a copy of its Body Worn Audio/Video Recorders policy (Goodhue County Sheriff's Office Policy 424; see APPENDIX B.) and compared it to the requirements of MS §626.8473. The requirements of this statute are reflected in the Goodhue County Sheriff's Office BWC policy.

3. Data Classification

Determine if data collected by BWCs is appropriately classified in accordance with Minnesota Statute §13.825 subd. 2.

Findings

Goodhue County Sheriff's Office policy 424.6 paragraph(s) a-g relate to the classification of data. This policy meets the requirements of the statute.

4. Retention of Data

Determine if data collected by BWCs is appropriately retained and destroyed in accordance with Minnesota Statute §13.825 Subd. 3.

Findings

Goodhue County Sheriff's Office policy 424.10 relates to data retention. This policy does not meet the statute requirements.

5. Access by Data Subjects

An individual who is the subject of the portable recording system data has access to the data, including data on other individuals who are the subject of the recording. If the individual requests a copy of the recording, data on other individuals who do not consent to its release must be redacted from the copy. The identity and activities of an on-duty officer engaged in an investigation or response to an emergency, incident or request for service may not be redacted, unless the officer's identity is subject to protection under section 12.82, Subd. 17, clause (a). MS§ 13.825 subd. 4, clause (b).

Findings

Goodhue County Sheriff's Office policy 424.10.2 states Except as provided by Minn. Stat. § 13.825, Subd. 2, audio/video recordings are considered private or nonpublic data. Any person captured in a recording may have access to the recording. If the individual requests a copy of the recording and does not have the consent of other non-law enforcement individuals captured on the recording, the identity of those individuals must be blurred or obscured sufficiently to render the subject unidentifiable prior to release. The identity of on-duty peace officers may not be obscured unless their identity is protected under Minn. Stat. § 13.82, Subd. 17.

6. Inventory of BWC Technology

Determine the total number of recording devices owned or maintained by the agency, a current record of the total number of recording devices actually deployed, the policies and procedures for use of portable recording systems required by MS§13.825 subd 5 and 6 inventory of portable recording system technology and the total amount of recorded audio and video data collected by the portable recording system.

Findings

Goodhue County Sheriff's Office has a total of 69 devices, with 68 deployed. Goodhue County Sheriff's Office uses the Motorola Platform, which offers stand-alone The BWC data is uploaded to the Cloud for storage, management, review, and sharing. A sampling of 65 BWC data events was haphazardly selected from the Motorola platform, and the audit log was examined to confirm the following information was collected: date, time, device/officer, classification, retention period, and, if applicable, whether deletion has occurred. No exceptions found.

7. Use of Agency Issued BWC

Use of agency-issued portable recording system MS§13.825 subd. 6 states that, while on duty, a peace officer must use the agency-issued and maintained system.

Findings

The Goodhue County Sheriff's Office policy 424.4 and 424.5 meets this requirement.

8. Authorization to Access Data

Determine that access to data collected by BWCs is in accordance with state statute.

Findings

The Goodhue County Sheriff's Office uses the Motorola platform. Motorola uses stand-alone devices that attach externally to their uniform. The BWC data is uploaded to the cloud for storage, management, review, and sharing with others. A sample of 65 videos recorded between 08/28/2024 and 08/19/2026 was randomly selected from the Motorola platform. The audit log was examined to confirm that data was accessed only for legitimate law enforcement purposes and by persons whose work assignment reasonably requires access to the data. Exceptions found, see summary.

9. Sharing among agencies

Determine that sharing of the data collected by BWCs is in accordance with state statute.

Findings

Goodhue County Sheriff's Office policy 424.10.1 meets this requirement.

10. Biennial Audit

MN Statute MS§13.825 subd. 9 requires a law enforcement agency to arrange for an independent, biennial audit of data.

Findings

Goodhue County Sheriff's Office implemented their BWC program in 2024. This is their first independent audit.

11. Notification to BCA

MS§13.825 subd. 10 requires a law enforcement agency to notify BCA within ten days of obtaining new surveillance technology that expands the type or scope of surveillance capability of a portable recording system device beyond video or audio recording.

Findings

At the time of this audit, Goodhue County Sheriff's Office has not obtained new surveillance technology. Goodhue County Sheriff's Office meets this requirement.

12. BWC Vendor (agreement)

MN Statute MS§13.825 subd. 11 paragraph b: A portable recording system vendor that stores a portable recording system data in the Cloud must protect the data in accordance with the security requirements of Federal Bureau of Investigation Criminal Justice Information Services Division Security Policy 5.4 or its successor version.

Findings

At the time of this audit, Goodhue County Sheriff's Office has an agreement with Motorola that meets this requirement.

Audit Conclusion:

In our opinion, the Goodhue County Sheriff's Office Body Worn Camera policy and program meets the requirements of Minnesota Statutes §626.8473 and §13.825.

Goodhue County Sheriff's Office Policy 424.6 does not include a retention schedule for discharge of a firearm, although it does include use of force, arrests, and written requests requesting data be preserved; simply adding discharge of a firearm to retention in Policy 424.6 would meet the requirements. There is a category in the BWC data system for Medical that does not coincide with the agency's retention schedule; simply adding this category to the retention schedule would remedy this.

(Random sampling of 65 BWC data follows the process of the State of Minnesota Office of the State Auditor.)

This audit and report cover the dates as established in the report. The reader and user should be aware that as a result of amendments to statutes in 2023, the requirements of statute about agency policies and procedures concerning access to Body Worn Camera data, records retention, and equipment operation have changed. This audit expresses no opinion on the issue of if the topics and subjects of this audit meet the requirements of statutes as amended and the user should review the new legislation with the assistance of legal counsel and make such updates, if any, as required by statute.

A summary of these results will be provided to the agency and to the Legislative Commission on Data Practices and Personal Data Privacy within 60 days.

Holly Sires
Crescent Security and Investigations