



Date: January 6, 2026

To: Sheryl M.M. Long, City Manager

From: Lauren Sundararajan, CFE, Internal Audit Manager *LS*

Copies to: Internal Audit Committee
William Weber, Assistant City Manager
Lieutenant Colonel Adam D. Hennie, Interim Police Chief

Subject: **Police Evidence and Property Management Audit**

Attached is the Police Evidence and Property Management audit report. The primary objectives of this performance audit were to evaluate the City's process and internal controls over the collection, storage, and disposal of property and evidence, and to determine whether the Cincinnati Police Department (CPD), State, and Federal policies were being followed and best practices utilized to ensure employee safety and property security. This audit was conducted in accordance with the current audit agenda.

We would like to thank the management and staff of the CPD for their assistance and cooperation during this audit.

If you need any further information, please contact me.

Attachment

Police Evidence and Property Management Audit

January 2026



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Internal Audit Manager

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Executive Summary

Internal Audit (IA) conducted a performance audit of the Cincinnati Police Department's (CPD) evidence and property management procedures. The primary objectives of this audit were to evaluate the City's process and internal controls over the collection, storage, and disposal of property and evidence, and to determine whether CPD, State, and Federal policies were being followed and best practices utilized to ensure employee safety and property security.

Maintaining evidence integrity is crucial to ensure that evidence items such as firearms, drugs, and currency are unaltered, safe from contamination, and accurately documented. CPD maintains evidence in the Court Property Unit (CPU), a storage facility housing items that are found, confiscated, or entered into evidence by CPD officers. The audit revealed several opportunities for strengthening internal controls over the evidence management and storage process. For instance, IA found that management review and oversight of evidence items should be strengthened. During unit visits and testing, IA confirmed that officers at the district level frequently mislabel items, and CPU staff must contact officers to correct discrepancies; however, corrections requests are not always addressed in a timely manner. Labeling all evidence correctly is critical to ensure that all items are accounted for and prevent evidence misappropriation.

IA found that there is a backlog of evidence items that have not been destroyed or auctioned on time. Per the CPD CPU Standard Operating Procedures (SOPs), found property can be disposed of after 30 days, and personal property should be held for 90 days; however, items scheduled for destruction dating back to May 2025 are currently taking up space in the unit. Additionally, IA also confirmed that auctions of CPU items have not taken place since 2018. Timely item destruction ensures that enough space exists for new items to be held and the unit remains consistent with department retention policies.

IA also found several errors with the inventory of evidence items. Best practices state that a comprehensive inventory should be completed annually to ensure that evidence and property are maintained, as well as when staff members leave the unit; however, CPD does not conduct comprehensive inventories. Upon randomly testing 50 items at the CPU, IA found various issues with 15 (30%) items, including missing CPD supervisor and CPU employee signatures, incorrectly labeled guns, casings, and currency, and one drug item that was not reweighed by CPU staff. Maintaining an accurate inventory of evidence items is critical in preserving evidence and property. Additionally, IA found that at the time of the audit, the CPU had not conducted a second quarter inventory audit in 2025 as required by CPD policies and procedures.

Overall, IA found that to strengthen internal controls, the following recommendations should be incorporated: improve management review and oversight over the labeling of evidence items prior to property room intake and ensure that officers are trained to address corrections requests; prioritize item destructions and establish a scheduled timeline for auctions to increase the unit's available space and stay consistent with retention policies; strengthen internal controls over inventory management; and ensure that all inventory audits are completed as stated in the CPU SOPs. Implementing these recommendations will ensure that proper internal controls have been established to ensure efficiency, effectiveness, and accountability over the evidence management process.

I. Introduction

Background

Maintaining evidence integrity is crucial to ensure that evidence items such as firearms, drugs, and currency are unaltered, safe from contamination, and accurately documented. CPD maintains evidence in the CPU, a storage facility housing items that are found, confiscated, or entered into evidence by CPD officers. It is currently staffed by a property manager, an officer, a supervising storekeeper, and a storekeeper, each of whom are responsible for processing and storing evidence items in accordance with police SOPs and state regulations.

When evidence is collected by officers, it is held in each police district's property room until it can be transported to the CPU for storage. CPU staff process the evidence packages, then ensure that it is either shelved awaiting trial or sent out for testing by the ballistics unit or the laboratory.

Upon intake of an item, storekeepers determine its retention period. There are four types of item stored in the property room, each subject to a different retention period per the Ohio Revised Code¹ (ORC) and the CPD SOPs²: evidence that may be presented in court (held indefinitely), found property not associated with a criminal case (held for 30 days), personal property such as purses or wallets (held for 90 days), and property confiscated by CPD (held for 1 year and can only be released with officer permission). When the retention period ends and items are marked for destruction, CPD's Inspections Unit is present and ensures that all packages contain the correct items to be destroyed. Additionally, an inventory audit is conducted by the Inspections Unit quarterly to ensure adherence to these procedures.

CPD maintains inventory and chain of custody records through the Axon system, which was implemented in March of 2025. Officers enter item information into Axon upon initial intake, and when evidence arrives at the CPU, it is checked by staff for accuracy. If evidence has been entered incorrectly by officers, the CPU will send a request for corrections that officers must address. CPD officers underwent training to ensure competency in using the system in October of 2025.

¹ ORC Section 2933.82, Retention of biological evidence

² CPD CPU SOP #3.90: "Generally, unclaimed property is held for 90 days...Found property can be disposed of after thirty days."

Audit Selection

IA conducted this audit in accordance with the Audit Work Plan.

Audit Objectives

The primary objectives of this audit were to evaluate the City's process and internal controls over the collection, storage, and disposal of property and evidence; and to determine whether CPD, State, and Federal policies were being followed and best practices utilized to ensure employee safety and property security.

Audit Scope and Methodology

To accomplish the audit objectives, IA compared current practices to industry standards, reviewed pertinent policies and procedures, interviewed appropriate staff, and analyzed statistics of relevant data. Records reviewed included property unit inventories and past inventory audits from Fiscal Year (FY) 24 to date. Best practices reviewed included the International Association of Chiefs of Police's (IACP) Property and Evidence Control Manual (2019), as well as the Ohio Property and Evidence Room Best Practices Manual (2021).

Statement of Auditing Standards

As required by the Cincinnati Administrative Code Article II §15, this audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), except for standard 5.60 pertaining to external peer review requirements. This exception did not have a material effect on the audit.

IA continues to conduct internal quality reviews to assure conformance with applicable GAGAS. IA performed the fieldwork between August and October of 2025.

Commendations

IA commends the staff of the Cincinnati Police Department for their cooperation throughout the audit.

II. Audit Findings and Recommendations

Management review and oversight of evidence items should be strengthened.

Labeling all evidence correctly is critical to ensure that all items are accounted for and prevent the misappropriation of evidence. IA found that there is insufficient oversight at the district level to ensure that all evidence items are labeled appropriately: officers who bag the items often mislabel them in the system and on the bags, and CPU staff must correct these discrepancies by contacting officers, who may or may not respond to their attempts. During a visit to the CPU, IA observed that one drug item was mislabeled to be tested for toxicology instead of drug ID, and one of the firearms processed only had one associated tag instead of the requisite four.

Additionally, IA found that a significant proportion of items were mislabeled and required more than one corrections request. IA randomly selected 30 dates between April 2025 and October 2025, then contacted the CPU manager to get a list of all corrections made on those dates, as well as the number of contact requests made for each item. IA determined that out of the 191 incorrectly labeled items, 37(19%) of the requests sent for correction were not addressed after the first contact attempt. The errors made prior to item intake create a greater workload for CPU staff, who must frequently correct the discrepancies and request corrections.

Recommendation 1: Improve management review and oversight over the labeling of evidence items prior to property room intake and ensure that officers are trained to address corrections requests.

Department Response: Agree. The Department is training a Property Liaison Supervisor in every district to provide additional oversight and training. The Property Liaison Supervisor can assist court property in ensuring that corrections are made in a timely manner.

There is no centralized dataset of corrections made by officers.

Maintaining and centralizing data on evidence that is mislabeled and subsequently corrected is essential to ensure that all items are accurately processed before they are used in trial proceedings. Each CPU employee maintains a daily spreadsheet of all requested corrections to evidence items. However, there is no central spreadsheet to manage or oversee these corrections. Because the data is not stored in one place, management is unable to conduct trend analysis on corrections without requesting a spreadsheet from each unit employee.

Recommendation 2: Ensure that corrections logs are centralized and regular trend analyses are conducted.

Department Response: Agree. Correction logs are now held centrally on a shared spreadsheet.

There is a backlog of items that have not been destroyed or auctioned on time.

Timely item destruction ensures that enough space exists for new items to be held and the unit remains consistent with department retention policies. IA determined that the found items scheduled for destruction are not being destroyed in a timely manner; at the time of the audit, the CPU manager informed IA that a backlog of approximately 2,100 found/personal items

existed going back to May 2025. Per the CPD Court Property Unit SOPs, found property can be disposed of after 30 days, and personal property should be held for 90 days; however, items scheduled for destruction are currently taking up space in the unit.

IA also confirmed that auctions of CPU items have not taken place since 2018 due to the City's contract with the auction vendor expiring. The City did not get a new auction vendor until the final Request for Quote was approved in May 2025. CPD's SOPs state that auctions must be held on a continuous basis³; however, these policies do not specify time periods or frequency of these auctions. As such, items that should have been auctioned over several years remain in the CPU.

Recommendation 3: Prioritize item destruction and establish a scheduled timeline for auctions to increase the unit's available space and stay consistent with retention policies.

Department Response: Agree. Destruction of items was postponed due to not having a contract with a vendor. The contract is now in place and court property will establish a scheduled timeline for auctions.

Inventory is not conducted per best practices.

Conducting regular inventory of evidence items is crucial to ensure that evidence is correctly documented and maintained. The Ohio Best Practices Manual states that a comprehensive inventory should be completed at least annually.⁴ While inventories of high-risk items such as firearms and drugs are conducted quarterly, CPD does not conduct an annual inventory of all items, and the CPU SOPs do not include policies and procedures regarding comprehensive inventories.

Additionally, per IACP standards, an inventory should be conducted every time a staff member leaves the unit.⁵ However, IA was informed that this only occurs when the unit supervisor leaves; current policy does not state that inventories should be conducted every time a staff member leaves.

Recommendation 4: Update policies and procedures, and ensure that inventory is conducted per best practices.

Department Response: Disagree. The recommendation is to conduct a full inventory of all property items annually and when any court property employee changes. We have 124,413 property items. A full inventory of all items would not be feasible with our staffing levels. However, while preparing to switch our software over to Axon, court property had to review all shelf locations. So, the majority of items were visually inspected and accounted for. Moving forward the Department is currently looking into a randomly selected partial inventory process.

³ CPD CPU SOP #3.90: "Auctions are held on a continuous basis via an Internet auction provider."

⁴ Ohio Property and Evidence Room Best Practices Manual (18): "A comprehensive inventory of the property and evidence room should be completed at least annually to account for all of its contents. For additional accountability, a second inventory should be completed in the same year or when personnel working in the property and evidence room change. Your policy should state when the annual inventory(ies) should be conducted and who should conduct it."

⁵ IACP Property and Evidence Control Manual (7): "After any staffing change, an objective external party should take inventory of the evidence, and the inventory records should be acknowledged and signed by agency stakeholders."

Several evidence items at the CPU were found to have inventory errors.

Maintaining an accurate inventory of evidence items is critical in ensuring the preservation of evidence and property in keeping with policies, procedures, and best practices. IA randomly tested 50 items at the CPU and found various issues with 15 (30%) items, including missing CPD supervisor and CPU employee signatures, incorrectly labeled guns, casings, and currency, and one drug item not reweighed by CPU staff.

Recommendation 5: Strengthen internal controls over inventory management.

Department Response: Agree. The Department will provide additional training to the district property officers to double-check property before it is transported and submitted to Court Property.

The CPU has not conducted a second quarter inventory audit in 2025.

Conducting regularly scheduled inventory audits ensures that all evidence items are labeled correctly and maintained properly. IACP standards⁶ and the Ohio Best Practices Manual⁷ recommend that audits be performed regularly, while the CPD SOPs state that property room audits should be conducted quarterly⁸. At the time of the audit, the second quarter audit had not been completed.

Recommendation 6: Ensure that all inventory audits are completed as stated in the CPU SOPs.

Department Response: Agree. CPU SOP 3.15 requires 2 audits of the court property room; a quarterly audit of at least 60 items and an audit of at least 60 items when the Evidence and Property Management Unit OIC is reassigned. All of the audits for 2025 were completed; however, due to a temporary staffing issue, the 2nd Quarter audit was completed late. The staffing issue has been resolved, and Inspections will continue their scheduled audits.

Background checks are not conducted per best practices.

The Ohio Best Practices Manual states that any personnel assigned to the property and evidence room should have an updated background investigation, and when possible, a drug screening, a polygraph test, and a financial screening.⁹ IA confirmed that while a general

⁶ IACP Property and Evidence Control Manual (7): "Agencies should conduct regular inventories and audits of evidence storage facilities to ensure accountability and accuracy of documentation."

⁷ Ohio Property and Evidence Room Best Practices Manual (18): "An audit of items within the property and evidence room should be conducted on a regular schedule, chosen by management, to check specific items of property to ensure they are present, in the location they are listed in the computer system, packaged properly, and documented in accordance with agency policy."

⁸ CPD CPU SOP #3.15: "The Court Property Unit Commander, in conjunction with the Inspection Section, will conduct a quarterly inspection to ensure adherence to procedures used for the control of property in Department custody."

⁹ Ohio Property and Evidence Room Best Practices Manual (3): Any civilian or sworn personnel newly assigned to the property and evidence room should have an updated background investigation completed prior to receiving access to the property and evidence room. This updated background investigation should include the following, where permitted by state or local laws and collective bargaining agreements: Drug Screening, Polygraph/ Computer Voice Stress Analyzer (CVSA) – Only related to thefts, substance abuse, financial issues, and truthfulness, Financial screening/credit check."

fingerprint check and drug screening is completed during CPD's hiring process, there are no additional background check procedures for staff newly assigned to the CPU.

Recommendation 7: Update policies and procedures, and ensure that background checks are conducted per best practices for CPU personnel.

Department Response: Agree in part. Court Property employees are AFSCME employees. While background checks are conducted of all employees who need LEADS/RCIC access; we are bound by the parameters of the AFSCME contract. The Department will reach out to Central Human Resources to explore whether the additional recommended screenings would be permitted by the AFSCME contract.

CPD does not have documented digital evidence management policies and procedures.

Officers are responsible for uploading digital evidence such as video into Axon; however, IA found that CPD does not have documented digital evidence management policies and procedures. Insufficient policies and procedures may lead to several issues; for example, if digital evidence items are not uploaded to Axon or received by the prosecutor's office, a Brady violation¹⁰ may occur and lead to overturned convictions.

Recommendation 8: Create and enforce policies and procedures surrounding the submission of digital evidence into Axon.

Department Response: Agree. In cooperation with the City Prosecutor's Office, the Department created and administered mandatory training to all officers on how to digitally load and maintain their evidence. The Department will work on creating policies and procedures to formalize this process.

The digital evidence management software at the City prosecutor's office does not integrate successfully with Axon.

Ensuring that digital evidence management software is compatible with software at the City prosecutor's office is critical to maintaining an efficient and accurate flow of information between departments. While CPD and the City prosecutor's office are currently working towards system compatibility, the digital evidence management software at the prosecutor's office currently does not integrate successfully with Axon.

Recommendation 9: Continue working with the City prosecutor's office to integrate both systems.

Department Response: Agree. CPD and the City Prosecutor's Office have been working on developing an integration between Axon Records and Matrix Prosecutor. This work is ongoing and will continue.

¹⁰ Cornell Legal Information Institute: "The Brady rule... requires prosecutors to disclose material, exculpatory information in the government's possession to the defense. Brady material, or the evidence the prosecutor is required to disclose under this rule, includes any information favorable to the accused which may reduce a defendant's potential sentence, go against the credibility of an unfavorable witness, or otherwise allow a jury to infer against the defendant's guilt."

The chain of custody record at the district level is maintained in two separate places.

To ensure that the integrity of evidence items is not compromised and the chain of custody is maintained, it is essential to document the items' locations at all times. Each district has a property logbook where officers sign evidence in and the transport officer signs evidence out to be transported to the CPU. IA confirmed that the Axon system for the districts does not have a field that documents the transport of items to the CPU; as such, the logbook must be filled out to indicate that items have been transported to properly document chain of custody.

Recommendation 10: Determine whether Axon's chain of custody record can document item transport.

Department Response: Agree. The Department will look into whether Axon's chain of custody record can document item transportation.

No policies exist governing the transportation of evidence from the police districts to the CPU.

Policies and procedures governing transportation of evidence from the police districts to the CPU are essential to prevent misappropriation or loss of evidence. IA inquired about procedures governing the transportation of property from the districts to the CPU, such as whether there were any policies preventing transport vans from making stops. Officers at each district confirmed that there were no policies governing this process.

Recommendation 11: Implement and enforce policies and procedures with guidelines for transporting items to the CPU.

Department Response: Agree. The Department will update its policies and procedures to add these guidelines.

Policies and procedures do not address proper oversight of the items that are taken to the sanitation facility.

Proper oversight of all evidence items is essential in preventing misappropriation of items and ensuring employee safety. The junk items from the destruction process (used lipsticks, old chargers, toothpaste, etc.) are taken to the City dump by a CPU employee. IA was informed that no policies exist governing the oversight of junk items between leaving the CPU and arrival at the sanitation facility. While the unit's policy states that items that hold no value for auction will be taken to the sanitation facility, it does not stipulate oversight of the items that are thrown away.

Recommendation 12: Update policies and procedures, and improve oversight of the items sent to the sanitation facility.

Department Response: Disagree. The items taken to the sanitation facility for destruction have no value. Court Property takes great care in inventorying and auditing gun, drug, and body armor destruction. With the numerous tasks placed upon them, inventorying trash before it is transported to the dump is an unnecessary burden as the quantity is immense.

Surveillance cameras are not connected to the mobile generator.

To preserve the chain of custody on evidence items, it is essential that the CPU's surveillance cameras are always operational so that items are not misappropriated. IA was informed that the temporary generator brought to the unit in case of a power outage powers the unit's freezers and alarm systems, but does not power the surveillance system.

Recommendation 13: Connect surveillance cameras to a mobile generator to preserve the chain of custody on evidence items.

Department Response: Agree. The Department will work with Facilities to determine if they can add surveillance cameras to the mobile generator.

There is no retention schedule associated with video camera footage.

Having a policy in place to clearly delineate the deletion protocols for footage is critical to ensure that the integrity of evidence items is preserved. IA was informed that unit surveillance video is retained for 15 days before it is overwritten; however, no retention schedule exists to determine when footage should be overwritten.

Recommendation 14: Create a retention policy for video camera footage.

Department Response: Agree. The Department will create a retention policy for video camera footage.

The unit's onboarding binder has not been updated to reflect current operations.

All new hires are made to undergo department onboarding procedures as outlined by CPD, and that an onboarding binder exists with a general overview of the unit's day-to-day operations. However, this binder has not been updated since the implementation of the Axon system—while all daily duties remain the same, the system has changed. For a program to run efficiently and effectively, onboarding procedures must be updated regularly to ensure employees are aware of all changes to their duties.

Recommendation 15: Update the onboarding binder to reflect current operations.

Department Response: Agree. The Onboarding binder has been updated to reflect current operations.

A third party cannot confirm that the unit's storekeeper was trained for the role.

Ensuring that all unit employees are trained to handle hazardous evidence such as firearms and drugs is critical to ensure the safety of CPU staff. IA was informed that the unit storekeeper underwent basic non-sworn citizen training as part of the onboarding process. However, when IA received the unit's training record, the storekeeper's records were missing. IA was informed that the storekeeper briefly left the CPU in 2023, and their record was deleted until they returned in 2024. As a result, this storekeeper does not have a training record on file.

Recommendation 16: Ensure that relevant training records are maintained for all CPU staff.

Department Response: Agree. CPU will begin adding their onboard and training materials in PowerDMS to create and maintain an official record.

III. Conclusion

Maintaining evidence integrity is crucial to ensure that evidence items are unaltered, safe from contamination, and accurately documented. The audit revealed several opportunities for improvement of evidence management processes.

To strengthen the internal controls, the following recommendations should be incorporated: improve management review and oversight over the labeling of evidence items prior to property room intake and ensure that officers are trained to address corrections requests; prioritize item destructions and establish a scheduled timeline for auctions to increase the unit's available space and stay consistent with retention policies; strengthen internal controls over inventory management; and ensure that all inventory audits are completed as stated in the CPU SOPs. Implementing these recommendations will ensure that proper internal controls have been established to ensure efficiency, effectiveness, and accountability over the evidence management process.

IV. Cincinnati Police Department Response



Date: December 20, 2025
To: Lieutenant Colonel Adam D. Hennie, Interim Police Chief
From: Captain Victoria Weyda, Logistics Section Commander
Copies to:
Subject: Court Property Room Internal Audit Response

Internal Audit (IA) conducted a performance audit of the Cincinnati Police Department's evidence and property management procedures. I recommend the following responses to the recommendations that were made:

Recommendation 1: Improve management review and oversight over the labeling of evidence items prior to property room intake and ensure that officers are trained to address corrections requests.

Response: Agree. The Department is training a Property Liaison Supervisor in every district to provide additional oversight and training. The Property Liaison Supervisor can assist court property in ensuring that corrections are made in a timely manner.

Recommendation 2: Ensure that corrections logs are centralized and regular trend analyses are conducted.

Response: Agree. Correction logs are now held centrally on a shared spreadsheet.

Recommendation 3: Prioritize item destruction and establish a scheduled timeline for auctions to increase the unit's available space and stay consistent with retention policies.

Response: Agree. Destruction of items was postponed due to not having a contract with a vendor. The contract is now in place and court property will establish a scheduled timeline for auctions.

Recommendation 4: Update policies and procedures and ensure that inventory is conducted per best practices.

Response: Disagree. The recommendation is to conduct a full inventory of all property items annually and when any court property employee changes. We have 124,413 property items. A full inventory of all items would not be feasible with our staffing levels. However, while preparing to switch our software over to Axon, court property had to review all shelf locations. So, the majority of items were visually inspected and

accounted for. Moving forward the Department is currently looking into a randomly selected partial inventory process.

Recommendation 5: Strengthen internal controls over inventory management.

Response: Agree. The Department will provide additional training to the district property officers to double-check property before it is transported and submitted to Court Property.

Recommendation 6: Ensure that all inventory audits are completed as stated in the CPU SOPs.

Response: Agree. CPU SOP 3.15 requires 2 audits of the court property room; a quarterly audit of at least 60 items and an audit of at least 60 items when the Evidence and Property Management Unit OIC is reassigned. All of the audits for 2025 were completed; however, due to a temporary staffing issue, the 2nd Quarter audit was completed late. The staffing issue has been resolved, and Inspections will continue their scheduled audits.

Recommendation 7: Update policies and procedures and ensure that background checks are conducted consistent with best practices for CPU personnel.

Response: Agree in part. Court Property employees are AFSCME employees. While background checks are conducted of all employees who need LEADS/RCIC access; we are bound by the parameters of the AFSCME contract. The Department will reach out to Central Human Resources to explore whether the additional recommended screenings would be permitted by the AFSCME contract.

Recommendation 8: Create and enforce policies and procedures surrounding the submission of digital evidence into Axon.

Response: Agree. In cooperation with the City Prosecutor's Office, the Department created and administered mandatory training to all officers on how to digitally load and maintain their evidence. The Department will work on creating policies and procedures to formalize this process.

Recommendation 9: Continue working with the City prosecutor's office to integrate both systems.

Response: Agree. CPD and the City Prosecutor's Office have been working on developing an integration between Axon Records and Matrix Prosecutor. This work is ongoing and will continue.

Recommendation 10: Determine whether Axon's chain of custody record can document item transport.

Response: Agree. The Department will look into whether Axon's chain of custody record can document item transportation.

Recommendation 11: Implement and enforce policies and procedures with guidelines for transporting items to the CPU.

Response: Agree. The Department will update its policies and procedures to add these guidelines.

Recommendation 12: Update policies and procedures and improve oversight of the items sent to the sanitation facility.

Response: Disagree. The items taken to the sanitation facility for destruction have no value. Court Property takes great care in inventorying and auditing gun, drug, and body armor destruction. With the numerous tasks placed upon them, inventorying trash before it is transported to the dump is an unnecessary burden as the quantity is immense.

Recommendation 13: Connect surveillance cameras to a mobile generator to preserve the chain of custody on evidence items.

Response: Agree. The Department will work with Facilities to determine if they can add surveillance cameras to the mobile generator.

Recommendation 14: Create a retention policy for video camera footage.

Response: Agree. The Department will create a retention policy for video camera footage.

Recommendation 15: Update the onboarding binder to reflect current operations.

Response: Agree. The Onboarding binder has been updated to reflect current operations.

Recommendation 16: Ensure that relevant training records are maintained for all CPU staff.

Response: Agree. CPU will begin adding their onboard and training materials in PowerDMS to create and maintain an official record.

VEW