

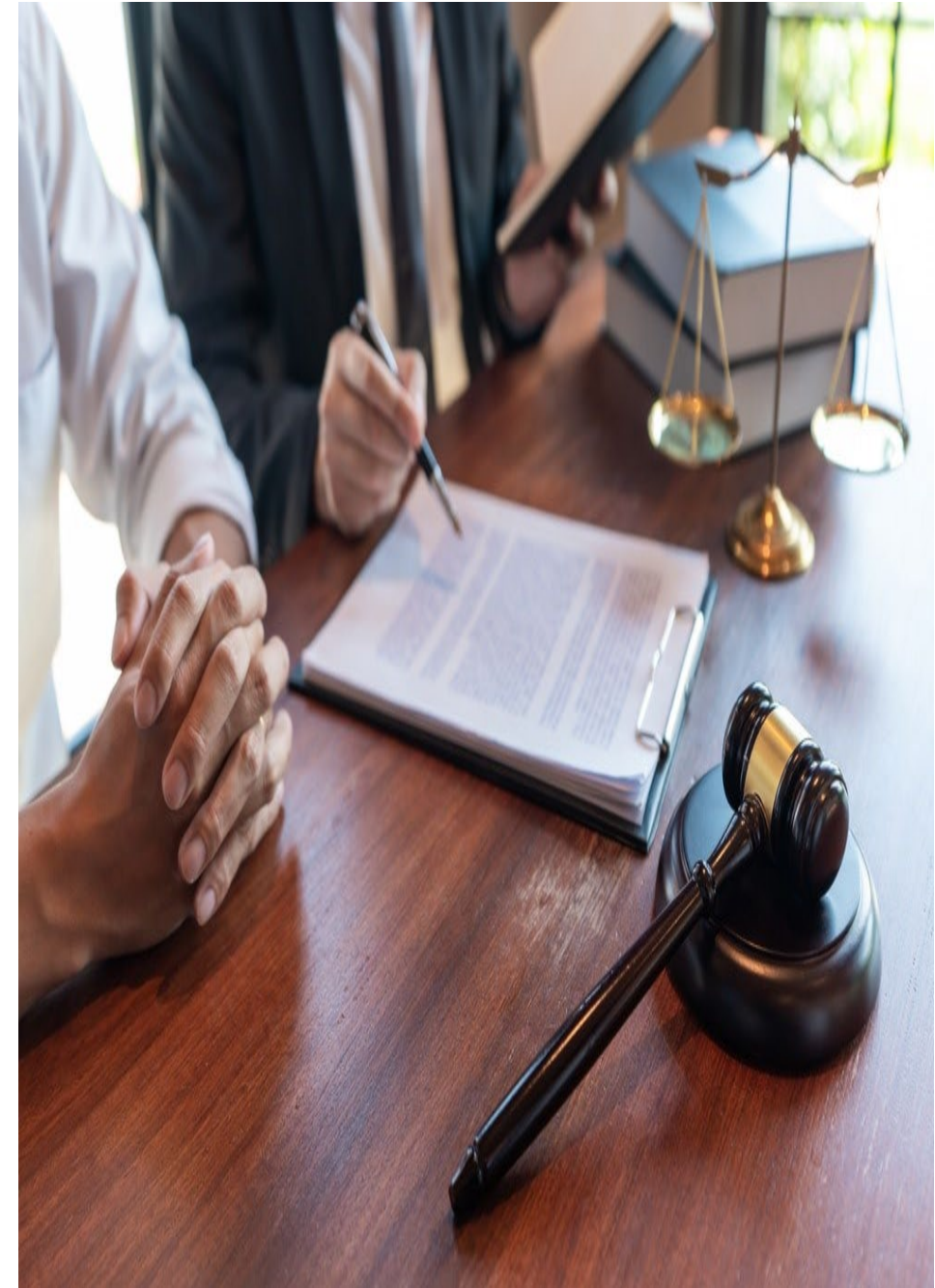


Annual Legal Briefing

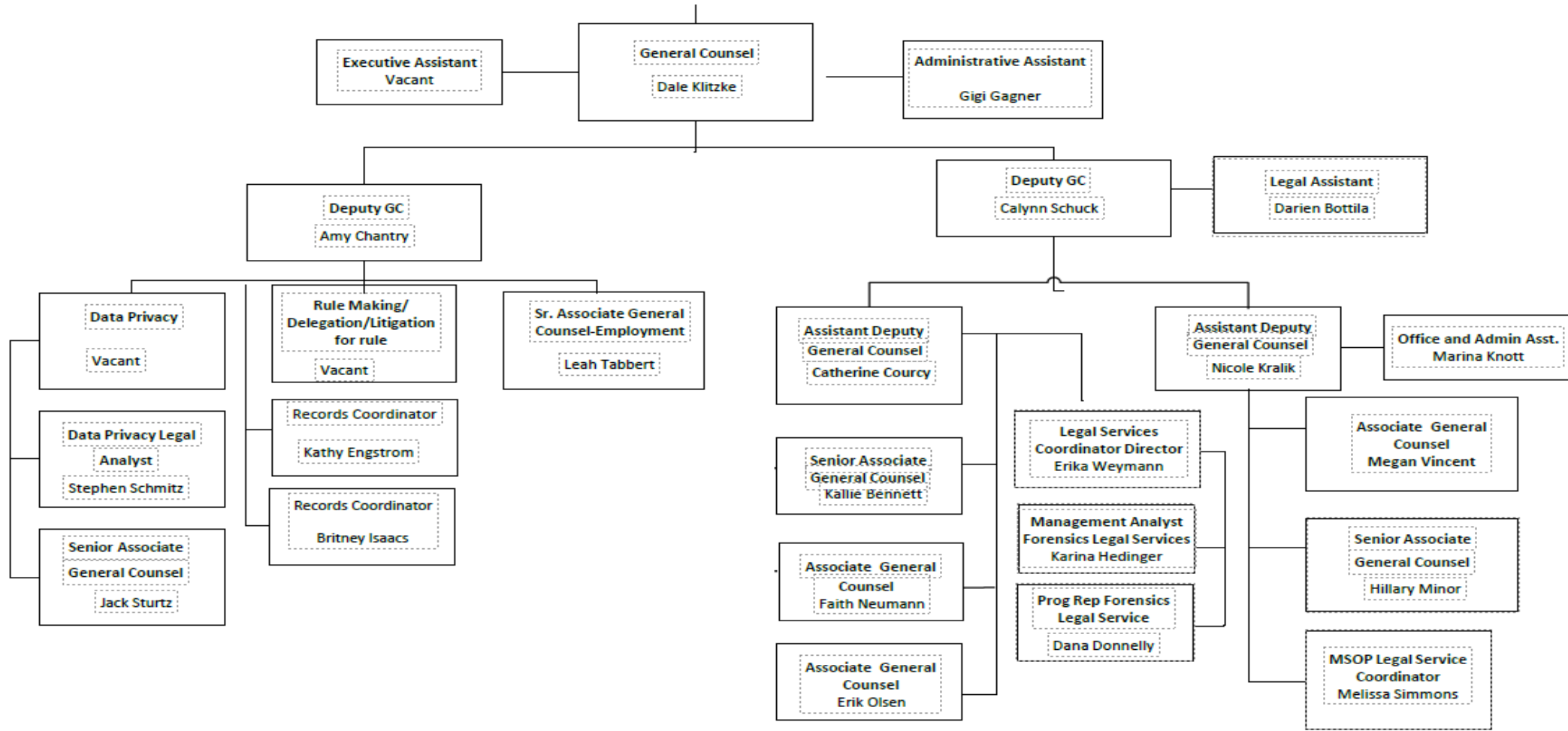
Dale Klitzke | General Counsel

Purpose of Today's Presentation

- Identify the General Counsel Structure
- Review Accomplishments
- Share FY26 data Q1&2:
 - Data Privacy
 - Litigation
- Discuss Goals and Strategic Priorities Ahead
- Identify Executive Partnership Needs



GCO Organizational Structure



2025 Focus → Infrastructure & Compliance Framework

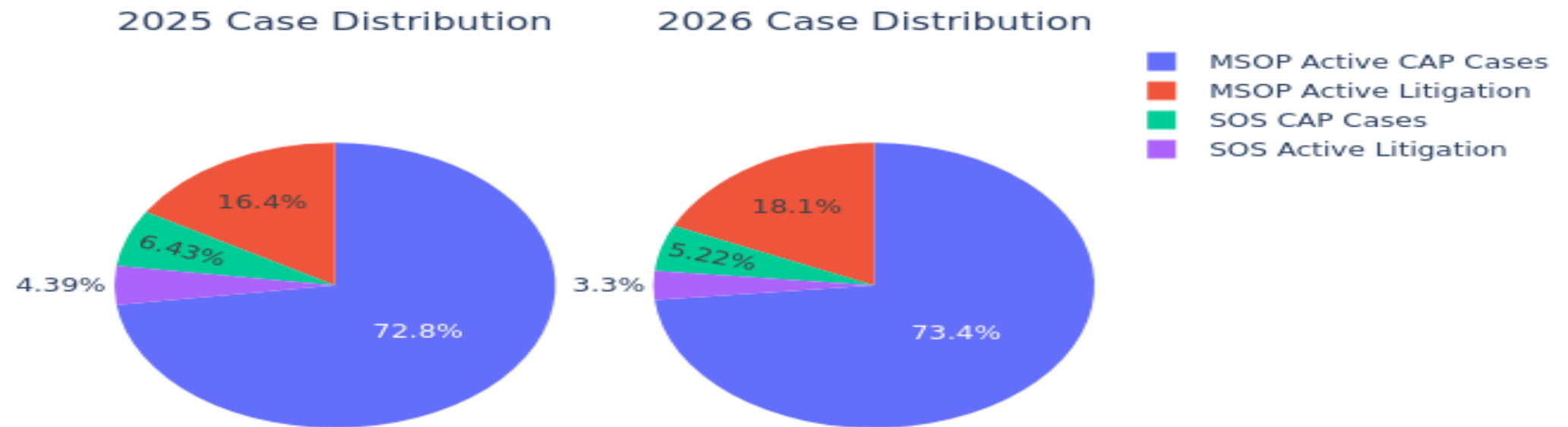
- Established policies
- Built a Data Privacy Office Structure and added to the litigation team
- Implemented case management system
- Created centralized data request system
- Established Dedicated Email Boxes:
 - Privacy.Office.DCT@state.mn.us
 - legalservices.dct@state.mn.us

Policies Created or Updated (2025)

- Legal Advice 130-1055
- Litigation Holds 130-1065
- Responding to Legal Actions 130-1000
- Legal Defense and Indemnification for DCT Employees 130-1065
- Pro Bono Services 130-1045
- Cooperation with Local, State, and Federal Law Enforcement Agencies 120-1097
- Board Policies (currently eight policies approved by the board)

DCT Litigation

Case Distribution Comparison (2025 vs 2026)



Data Incident Metrics

July – September 2025

TYPE	NUMBER
Data Incidents	29
Data Breaches	7
Incidents Reported	9
Data Breaches of 500+	0

January – March 2026

TYPE	NUMBER
Data Incidents	47
Data Breaches	6
Incidents Reported	3
Data Breaches of 500+	0

Data Request Metrics

July – September 2025

TYPE	NUMBER
Data Requests	785
Data Challenges	3

January – March 2026

TYPE	NUMBER
Data Requests	1,102
Data Challenges	47

Strategic Goals

1. Improve Finance reporting and analysis of DCT litigation expenses across DCT
2. Continue to fill all vacancies – Build and Stabilize GCO Team
3. Continue to develop tracking systems to create accurate and up-to-date reporting-Data Privacy and Litigation
4. Embedded Legal Expertise into Operations
5. Develop and formalize a customer focused Data Privacy Office
6. Update DCT Rules to be consistent with the Statute amendment and creations through the years.

Executive Partnership Needed

- Support for hiring stabilization
- Continued Support in developing additional case management projects
- Reinforcement of data security
- Support of legislative initiatives to help lower risk and liability

From Infrastructure to Impact

- FY26 Continue to Build
- FY27 Stabilize and Strengthen
- FY28 Measure and Lead

General Counsel Office as a strategic partner:

- Anticipate Agency Risk Instead of Just Responding to It
- Strengthen Governance and Executive Decision Making
- In connection with the Compliance office; help lead culture and ethics efforts
- Continue to communicate like a business leader, not just lawyers

Thank You!

Dale Klitzke

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