

# THE AXTELL GROUP

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January 26, 2025

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Police Chief Brandon Silgjord  
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Chief Silgjord,

Pursuant to the professional services agreement between The Axtell Group and the Sartell Police Department, The Axtell Group has completed an independent Portable Recording System (PRS) biennial audit as required by Minnesota Statutes, section 13.825, subdivision 9.

The Axtell Group assessed whether the Sartell Police Department (SPD) has in place the policies, procedures, protocols, staff, systems, and importantly – practices – that appropriately collect, classify, store, secure, and manage PRS data according to sections 13.825 and 626.8473. The Axtell Group assessed how the data are used, whether the data are destroyed as required under section 13.825, and whether the SPD's program complies with subdivisions 7 (authorization to access data) and 8 (sharing among agencies) of section 13.825 and with section 626.8473.

The Axtell Group's audit included a review and assessment of the SPD's policies, procedures, records, the PRS platform itself, including platform portal interfaces and access functions, the PRS vendor contract, audit logs, and PRS equipment inventory. The Axtell Group also conducted an interview of key staff responsible for administering the program, including the program manager responsible for release, retention, and destruction of PRS data. The Axtell Group also accessed video data as necessary to verify statutory compliance.

The elements cited under Minnesota Statutes sections 13.825 and 626.8473 include:

- Written policies and procedures
- Data classification
- Retention of data

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- Access to data
- Inventory of portable recording system technology
- Use of agency issued portable recording systems
- Sharing among agencies
- Biennial audit
- Notification to the BCA
- Portable recording system vendor

It is The Axtell Group’s determination that the Sartell Police Department is in compliance with Minnesota Statutes sections 13.825 and 626.8473 based on the following evaluations:

Item	Statute	Reference	Testing Procedure	Result
1	§ 626.8473 subd. 1	Definition of PRS established in policy	Reviewed SPD Policy 423.1.1 - Portable Audio/Video Recorders-Body Worn Cameras (BWC)	No exceptions found
2	§ 626.8473 subd. 3	Written policy and public availability	Reviewed SPD Policy 423.2 - Portable Audio/Video Recorders and 423.8.2 - Access to Portable Recordings  Reviewed SPD Policy 804.4 Records Maintenance and Release-Processing Requests for Public Records  Viewed the SPD public records webpage: <a href="https://cms5.revize.com/revize/sartell/Portable Audio Video Recorders - Body Worn Cameras BWC .pdf">https://cms5.revize.com/revize/sartell/Portable Audio Video Recorders - Body Worn Cameras BWC .pdf</a>	No exceptions found

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3	§ 626.8473 subd. 3	PRS data classification	<p>Reviewed SPD policy 423.9 - Identification and Preservation of Recordings</p> <p>Interviewed key personnel responsible for managing the PRS system to discuss protocols and system operations</p> <p>Reviewed quarterly PRS data, via audit trail logs provided by SPD</p>	No exceptions found
4	§ 626.8473 subd. 3 § 13.825 subd. 3	Retention of data	<p>Reviewed SPD policy 423.8 Retention of Recordings</p> <p>Reviewed SPD Police Records Maintenance and Release 804.3 Custodian of Records Responsibilities</p> <p>Reviewed a Command Central Evidence audit for a six-month time-period, created by the system for deleted videos. Random cases were checked for data retention compliance via cloud based, automatic set, purge rules</p> <p>Reviewed Motorola Solutions Retention and Labeling/Tagging instructions and Evidence.com retention for permanent records</p>	No exceptions found
5	§ 626.8473 subd. 3, including (b) (6)-(12)	Use and operation of system	Reviewed SPD policy 423.5 - Member Responsibilities, 423.6 - Activation of Audio/Video Recorder, and 423.7 - Prohibited Use of Audio/Video Recorders	No exceptions found
6	§ 626.8473 subd. 3 (b)(1)	No altering, erasing, or destroying any recording, data, or metadata related to the recording prior to the expiration of the retention period	<p>Reviewed SPD policy 423.8 Retention of Recordings</p> <p>Reviewed video destruction log and inspected random cases</p>	No exceptions found

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7	§ 626.8473 subd. 3 (b)(2)	PRS positioning requirement	Reviewed SPD policy 423.5 Member Responsibilities	No exceptions found
8	§ 626.8473 subd. 3 (b)(3)	Application of policy – other agency	Reviewed SPD policy 423.1 - Purpose and Scope and 423.2 - Policy	No exceptions found
9	§ 13.825 subd. 5	Inventory of PRS technology	Reviewed SPD inventory of BWC provided by SPD  Reviewed SPD policy 423.3 (e) - Coordinator Inventory of BWC and Records  Interviewed key personnel responsible for managing the PRS system to discuss protocols and records	No exceptions found
10	§ 626.8473 subd. 3 (4)  § 13.825 subd. 2 (5)(b)-(d)	Inspection of video	Reviewed SPD policy 423.10 Review of Recorded Media Files  Reviewed SPD policy 804.5 Release Restrictions (Protected Information-CJDN)  Reviewed SPD policy 305.9.1 Audio/Video Recordings of Use of Force Incidents Involving Deaths of Individuals  Reviewed quarterly PRS data, via audit trail logs provided by SPD	No exceptions found
11	§ 13.825 subd. 3 (2) (c)  § 626.8473 subd. 3 (b)(1)	Retention of video specific to deadly force	Reviewed Motorola Solutions Category Retention and Labeling/ Tagging instructions and Command Central Evidence retention for permanent records  Reviewed the General Retention Schedule for League of Minnesota Cities  Reviewed SPD policy 423.8 Retention of Recordings  Reviewed SPD policy 305.9 Audio/Video Recordings-Officer-Involved Shootings and Deaths	No exceptions found

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12	<p>§ 13.825 subd. 2 (d)</p> <p>§ 626.8473 subd. 3 (b)(5)</p>	<p>Release of video (officer involved use of force resulting in death)</p>	<p>Reviewed SPD policy 305.9.1 Audio and Video Recordings of Use of Force Incidents Involving Death of Individuals</p> <p>Reviewed SPD policy 423.8.1 Release of Audio/Video Recordings</p> <p>Reviewed SPD policy 804.5 Release Restrictions Records and Maintenance</p> <p>Discussed with key personnel responsible for managing the PRS system how SPD uses Watch Guard, Command Central Evidence, and Motorola platforms for releasing and redacting BWC footage</p> <p>Viewed the SPD webpage: <a href="https://cms5.revize.com/revize/sartell/Portable_Audio_Video_Recording_Orders_-_Body_Worn_Cameras_BWC_.pdf">https://cms5.revize.com/revize/sartell/Portable Audio Video Recording Orders - Body Worn Cameras BWC .pdf</a></p>	<p>No exceptions found</p>
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13	§ 13.825 subd. 4	Access by data subjects	<p>Reviewed SPD “Public Data Requests” (online) and form to request data</p> <p>Reviewed SPD policy 804.4 - Processing Requests for Public Records</p> <p>Reviewed SPD policy 423.8 - Retention of Recordings</p> <p>Reviewed Motorola Solutions employees interface portal and access requirements, including operation procedures for access, and access monitoring and logging</p> <p>Interviewed key personnel responsible for managing the PRS system to discuss protocols and records</p> <p>Viewed the SPD public records webpage:  <a href="https://cms5.revize.com/revize/sartell/Portable_Audio_Video_Records_-_Body_Worn_Cameras_BWC_.pdf">https://cms5.revize.com/revize/sartell/Portable Audio Video Records - Body Worn Cameras BWC .pdf</a></p>	No exceptions found
14	§ 13.825 subd. 5	Access logs /inventory of PRS technology	<p>Interviewed key personnel responsible for managing the PRS system to discuss protocols and system operation</p> <p>Reviewed quarterly PRS data, via audit trail logs provided by SPD</p>	No exceptions found
15	§ 13.825 subd. 6	Use of portable recording systems	<p>Reviewed SPD policy 423 Portable Audio/Video Recorders-Body Worn Cameras (BWC)</p> <p>Reviewed SPD quarterly data, via audit trail logs provided by SPD</p>	No exceptions found

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16	<p>§ 13.825 subd. 7</p> <p>§ 626.8473 subd. 3</p>	Authorization to access data	<p>Reviewed SPD policy 423 and 423.3 Portable Audio/Video Recorders-Coordinator responsibilities</p> <p>Reviewed SPD policy 804.3 Records Maintenance and Release Custodian of Records Responsibilities</p> <p>Reviewed SPD policy 305.9 and 305.9.1 Audio/Video Recordings Officer-Involved Shootings and Deaths</p> <p>Reviewed quarterly PRS data, via audit trail logs provided by SPD</p> <p>Interviewed key personnel responsible for managing the PRS system to discuss inventory protocols and records</p>	No exceptions found
17	§ 13.825 subd. 8	Sharing among agencies	<p>Reviewed SPD policy 423.8.1 Release of Audio/Video Recordings and SPD policy 804 Records Maintenance and Release</p> <p>Reviewed quarterly PRS data, via audit trail logs provided by SPD</p> <p>SPD BWC chain of custody is tracked in Evidence Manager</p>	No exceptions found
18	§ 13.825 subd. 9	Biennial audit	<p>This is Sartell Police Department's first audit. The SPD began their BWC program in June of 2023</p> <p>Reviewed SPD BWC procedures</p>	No exceptions found

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19	§ 626.8473 subd. 10	Notification to BCA	Interviewed key personnel responsible for managing the PRS system	No exceptions found
20	§ 13.825 subd. 11	PRS vendor operates in accordance with United States FBI Criminal Justice Information Services Division Security	Reviewed the Motorola vendor contract and the Motorola Solutions vendor website. Motorola guarantees CJIS compliance through its operating systems.	No exceptions found

The audit has determined that the Sartell Police Department’s PRS data collection, classification, use, dissemination, and destruction of data comply with Minnesota Statutes sections 13.825 and 626.8473.

The Axtell Group, LLC  
 Robert Thomasser  
 Chief Operating Officer