



**City of Mendota Heights Police Department
Portable Recording System (PRS) Biennial Audit
Summary of Audit Findings
October 22, 2025**

At the request of the Mendota Heights Police Department (MHPD), Local Government Information Systems (LOGIS) has conducted the biennial audit of their Portable Recording System (PRS) pursuant to Minnesota Statute §13.825 Subdivision 9.

Minnesota Statute §13.825 data elements include:

- Data Classification
- Data Retention
- Access by Data Subjects
- Inventory of Portable Recording System Technology
- Use of Agency-Issued Portable Recording Systems
- Authorization to Access Data
- Sharing Among Agencies
- Biennial Audit
- Notification to the BCA
- Portable Recording System Vendor

After analysis of the statutory requirements and evaluation of Mendota Heights Police Department's management and use of Portable Recording System (PRS) technology, LOGIS has found the Mendota Heights Police Department (MHPD) in compliance with Minnesota Statute §13.825 based on the following findings:

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Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 2	Data Classification	Reviewed MHPD policy 419.6.4 CLASSIFICATION of RECORDINGS MHPD policy indicates 6 classes of data classification: 1. Accidental – recordings that have no evidentiary value 2. Case File – recordings that have an associated report or case file 3. Citation – recordings that have an associated citation but no case file 4. Extraneous – recordings that do not meet the requirements of the other categories and have no value beyond the minimum retention requirement 5. Internal Investigation – recordings that have evidentiary value in any internal investigation 6. Permanent – recordings that are associated with a death investigation Reviewed Axon PRS data classification configurations to ensure configurations are in alignment with MHPD policy.	MHPD PRS data is properly classified according to statutory requirements set forth by MN Statute §13.825 Subdivision 2
§13.825 Subdivision 3	Data Retention	Reviewed MHPD policy 419.6.4 CLASSIFICATION of RECORDINGS Data is retained for 180 days unless otherwise specified by policy. MHPD policy defines 6 classes of data and the associated retention period: 1. Accidental – 180 days 2. Case File – 7 years 3. Citation – 3 years 4. Extraneous – 180 days 5. Internal Investigation – until manually deleted 6. Permanent – until manually deleted Reviewed Axon PRS data classification configurations to ensure configurations are in alignment with MHPD policy.	MHPD PRS data is properly classified according to statutory requirements set forth by MN Statute §13.825 Subdivision 3

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Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 4	Access by data subjects	Reviewed MHPD Policy 803 – RECORDS MAINTENANCE and RELEASE This policy provides the necessary guidance for the maintenance and release of departmental records. Protected Information is covered separately in the Protected Information Policy All requests for data are to be routed to the Custodian of Records	MHPD PRS data processes, guidance and policies meet the statutory requirements set forth by MN Statute §13.825 Subdivision 4
§13.825 Subdivision 5	Inventory of PRS Technology	Reviewed MHPD Policy 419.3 – COORDINATOR The Chief of Police or the authorized designee should designate a coordinator responsible for the security, storage and maintenance of PRS data recordings and body camera inventory MHPD maintains the following inventory: 37 – total number of cameras which is a combination of Axon Body 4 and Axon Body 3 24 – number of cameras assigned to unique individuals within the department 13 – number of cameras in a relinquished state	MHPD camera inventory meets the requirements set forth by MN Statute §13.825 Subdivision 5

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Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 6	Use of agency-issued devices	Reviewed, MHPD Policy 419.7 - PROHIBITED USE OF AUDIO/VIDEO RECORDERS Members are prohibited from using department-issued portable recorders and recording media for personal use and are prohibited from making personal copies of recordings Members are prohibited from using personally owned recording devices while on-duty without the express consent of the Shift Sergeant. Any member who uses a personally owned recorder for department-related activities shall comply with the provisions of this policy	MHPD policy for the use of agency issued devices meets the requirements set forth by MN Statute §13.825 Subdivision 6
§13.825 Subdivision 7	Authorization to access data	Reviewed MHPD policies for managing records 419.8 Retention of Records, 419.9 Identification and Preservation of Recordings, 419.10 Recorded Media Files and Policy 803.4 Processing Records for Release Policies state that any request for data must be routed through the Custodian of Records Access is only granted to agency individuals on a need-to-know basis The Axon system is configured using RBAC to assign individuals the required access to perform assigned duties	MHPD policy for the authorization to access data meets the requirements set forth by MN Statute §13.825 Subdivision 7

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Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 8	Sharing among agencies	Reviewed MHPD policy 803 RECORDS MAINTENANCE and RELEASE Policy provides the required guidance for the release of records to the public, outside non-Criminal Justice Agencies, the media and other Criminal Justice Agencies Records releases are requested through and by the Custodian of Records.	MHPD policy for the sharing of data with other agencies meets the requirements set forth by MN Statute §13.825 Subdivision 8
§13.825 Subdivision 9	Biennial audit	Reviewed MHPD policy 419.3 – COORDINATOR The Coordinator is responsible for ensuring that the biennial audit is conducted as required by statute	MHPD policy for the biennial audit meets the requirements set forth by MN Statute §13.825 Subdivision 9
§13.825 Subdivision 10	Notification to the BCA	Reviewed MHPD policy 419.3 – COORDINATOR The Coordinator is responsible for ensuring that the notification to the BCA is carried out whenever there are technological changes to the system. There have been no significant changes since the previous audit in 2023	MHPD policy for the biennial audit meets the requirements set forth by MN Statute §13.825 Subdivision 10
§13.825 Subdivision 11	PRS vendor	MHPD is using 2025 Axon Enterprises, Inc V2025-09-05.213776 Axon Evidence August 2025 CHROME 140 The version is the current vendor production release	MHPD PSR software version meets the requirements set forth by MN Statute §13.825 Subdivision 11

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The findings in the Portable Recording System Audit are impartial and based on information and documentation provided by the City of Mendota Heights Police Department and examined by LOGIS Information Security staff and management. It demonstrates that the security, public accountability, and administration of the Mendota Heights Police Department Portable Recording System program meet the requirements and is compliant with MN Statute §13.825. Local Government Information Systems (LOGIS) attested this audit on October 22, 2025.

Patrick Buie

Patrick Buie

Local Government Information Systems, Information Security Specialist

Wayne Wegener

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Captain, Mendota Heights Police Department

Respectfully submitted to the following:

Wayne Wegener, Captain, Mendota Heights Police Department

Legislative Law Library

Judiciary Finance and Civil Law (Rep. Becker-Finn and Rep. Scott)

Public Safety Finance and Policy (Rep. Moller and Rep. Novotny)

Judiciary and Public Safety Finance and Policy Committee (Sen. Warren Limmer and Sen. Ron Latz)

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