

# THE AXTELL GROUP

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May 8, 2026

Chief Cory Johnson  
Deephaven Police Department  
20225 Cottagewood Road  
Deephaven, Minnesota 55331

## **RE: Biennial Audit of the Portable Recording System (PRS) / BWC Program**

Chief Johnson:

Pursuant to the professional services agreement between The Axtell Group and the Deephaven Police Department, The Axtell Group completed an independent biennial audit of the department's Portable Recording System (PRS) program, as required under Minnesota Statutes sections 13.825 and 626.8473.

The audit focused on whether the Deephaven Police Department (DPD) implemented the appropriate policies, procedures, and systems to appropriately classify data according to Minnesota Statutes § 13.825, how the data are used, and whether the data are destroyed as required under § 13.825, and to verify compliance with subdivisions 7 (authorization to access data) and 8 (sharing among agencies).

The Axtell Group found the Deephaven Police Department's PRS program compliant with the applicable requirements of Minnesota Statutes sections 13.825 and 626.8473. No material exceptions were identified during the audit period.

The audit was conducted by The Axtell Group for services provided between June 11, 2024, and May 7, 2026. The Axtell Group's audit included an independent verification of the following:

- Department policies and procedures governing Portable Recording Systems
- Retention schedules and data classification requirements
- Access logs and audit trails
- Motorola Solutions PRS platform administrative controls
- Data retention, deletion, and classification settings
- Confirmation from personnel responsible for PRS administration and compliance
- Public access and policy publication requirements
- Compliance with Minnesota Government Data Practices Act requirements

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The Deephaven Police Department, located in Hennepin County, Minnesota, implemented its portable recording system program in 2024 using Motorola Solutions body worn cameras. Authorized personnel may access PRS data through secured department systems for legitimate law enforcement and administrative purposes. The Department maintains a publicly available PRS policy and follows the General Records Retention Schedule for Minnesota Cities in conjunction with statutory retention requirements under Minnesota Statutes section 13.825.

We appreciate the cooperation and professionalism of the Deephaven Police Department personnel throughout this audit process. The Department demonstrated a strong commitment to compliance, accountability, and transparency in its administration of portable recording system technology.

Should you have any questions regarding this audit report or wish to discuss the findings further, please do not hesitate to contact me.



Todd Axtell  
President and CEO  
The Axtell Group

**Submitted to:**

Cory Johnson, Chief of Police, Deephaven Police Department  
Legislative Reference Library  
Legislative Commission on Data Practices and Personal Data Privacy  
House Committee on Judiciary Finance and Civil Law  
House Committee Public Safety Finance and Policy  
Senate Judiciary and Public Safety Finance and Policy Committee  
Senate State and Local Government Committee

**Audit Summary**

Statute Subd.	Reference Objective	Testing Finding(s)
<b>Section 626.8473</b>		
§ 626.8473 Subd. 1	Definition of PRS established in policy	No exceptions found.
§ 626.8473 Subd. 2 and 3.	Public comment	No exceptions found.
§ 626.8473 Subd. 3	Written policy and public availability	No exceptions found.

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§ 626.8473 Subd. 3 (b)(1)	Application of policy – data classification and retention	No exceptions found.
§ 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	No exceptions found.
§ 626.8473 Subd. 3 (b)(2)	PRS positioning requirement	No exceptions found.
§ 626.8473 Subd. 3 (b)(3)	Other law enforcement agency	No exceptions found.
§ 626.8473 Subd. 3 (b)(4)	Use-of-force resulting in death - Inspection rights	No exceptions found.
§ 626.8473 Subd. 3 (b)(5)	Use-of-force resulting in death - Release of PRS data	No exceptions found.
§ 626.8473 Subd. 3 (b)(6)	Procedures for testing the PRS system for functionality	No exceptions found.
§ 626.8473 Subd. 3 (b)(7)	Procedures to address malfunctions or failures	No exceptions found.
§ 626.8473 Subd. 3 (b)(8)	When recording is mandatory, prohibited, or at the discretion of the officer	No exceptions found.
§ 626.8473 Subd. 3 (b)(9)	When notice must be given to a data subject	No exceptions found.
§ 626.8473 Subd. 3 (b)(10)	When recording may be ended while an encounter is ongoing	No exceptions found.
§ 626.8473 Subd. 3 (b)(11)	Procedures for the secure storage of PRS data	No exceptions found.
§ 626.8473 Subd. 3 (b)(12)	Compliance	No exceptions found.
<b>Section 13.825</b>		
§ 13.825 Subd. 2 (a)	Data classification	No exceptions found.

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§ 13.825 Subd. 2 (b) and (c)	Data classification; Use-of-force resulting in death - Inspection rights	No exceptions found.
§ 13.825 Subd. 2 (d)	Data classification; Use-of-force resulting in death - Release of PRS data	No exceptions found.
§ 13.825 Subd. 2 (e)	Data classification; clearly offensive data	No exceptions found.
§ 13.825 Subd. 2 (e)	Tennessee	No exceptions found.
§ 13.825 Subd. 3 (a)	Data retention <sup>1</sup>	No exceptions found.
§ 13.825 Subd. 3 (c); § 626.8473 (b)(1)	Retention of video specific to deadly force	No exceptions found.
§ 13.825 Subd. 3 (d)	Retention upon request	No exceptions found.
§ 13.825 Subd. 4	Access by data subjects	No exceptions found.
§ 13.825 Subd. 5	Inventory of PRS technology	No exceptions found.
§ 13.825 Subd. 5	Access logs/inventory of PRS technology	No exceptions found.
§ 13.825 Subd. 6	Use of portable recording systems	No exceptions found.
§ 13.825 Subd. 7 § 626.8473	Authorization to access data	No exceptions found.
§ 13.825 Subd. 8	Sharing among agencies	No exceptions found.
§ 13.825 Subd. 9	Biennial audit	No exceptions found.
§ 13.825 Subd. 10	Surveillance technology	No exceptions found.
§ 13.825 Subd. 11	PRS vendor operates in accordance with United States FBI Criminal Justice Information Services Division Security	No exceptions found.
§ 13.825 Subd. 12	Compliance	No exceptions found.

<sup>1</sup> For a brief portion of the audit period, certain test data were not retained for the full 90-day period. The retention setting was corrected and all data are retained for a minimum of 90 days, with other classifications being retained longer than statutory minimums.