

THE AXTELL GROUP

May 20, 2026

Derek Randall
Chief of Police
Cloquet Police Department
101 14th Street
Cloquet MN 55720

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

Chief Randall:

Pursuant to the professional services agreement between The Axtell Group and the Cloquet 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 Cloquet Police Department implemented policies, procedures, and systems to appropriately classify data according to Minnesota Statutes section 13.825, how the data are used, whether the data are destroyed as required under section 13.825, and to verify compliance with subdivisions 7 (authorization to access data) and 8 (sharing among agencies).

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

Audit activities were completed on May 12, 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
- Data creation, access, and destruction logs, and audit trails
- Axon 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

The Cloquet Police Department implemented its portable recording system program in 2024 using Axon body-worn cameras. Authorized personnel may access PRS data through secure 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.

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We appreciate the cooperation and professionalism of Cloquet 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

Report Submitted to:

Derek Randall, Chief of Police, Cloquet Police Department
Legislative Reference Library
Legislative Commission on Data Practices and Personal Data Privacy
House Committee on Judiciary Finance and Civil Law
House Committee on 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)
Section 626.8473		
§ 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.
§ 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.

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§ 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.
Section 13.825		
§ 13.825, subd. 2 (a)	Data classification	No exceptions found.
§ 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 warning	No exceptions found.
§ 13.825, subd. 3 (a)	Data retention	No exceptions found.
§ 13.825, subd. 3 (b)	Data retention	No exceptions found.
§ 13.825, subd. 3 (c); § 626.8473, subd. 3 (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.

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§ 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, subd. 3 (b)(12)	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 CJIS security requirements	No exceptions found.
§ 13.825, subd. 12	Compliance, penalties for violation	No exceptions found.