THE AXTELL GROUP

October 30, 2026

Chief Daniel M. Wills
Rogers Police Department
21860 Industrial Court
Rogers, MN 55374

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

Chief Wills,

Pursuant to the professional services agreement between The Axtell Group and the Rogers 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 Rogers Police Department implemented policies, procedures, and systems to appropriately classify data according to Minnesota Statutes section 13.825; whether the data are used in accordance with statutory requirements; whether the data are destroyed as required under section 13.825; and whether the department complies with subdivisions 7 (authorization to access data) and 8 (sharing among agencies).

The audit period was from February 1, 2024, through January 31, 2026.

The Axtell Group found the Rogers 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.

The Rogers Police Department uses Axon body-worn cameras. Authorized personnel may access PRS data through secured systems for legitimate law enforcement purposes. The Rogers Police Department maintains a publicly available PRS policy and follows the records retention schedule adopted by the League of Minnesota Cities.

We appreciate the cooperation and professionalism of Rogers 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:
Daniel M. Wills, Chief of Police
Legislative Reference Library

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
§ 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)	Tennessen	No exceptions found
§ 13.825 Subd. 3 (a)	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
§ 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 complies with the FBI Criminal Justice Information Services (CJIS) Security Policy	No exceptions found