



Tulsa Police Department

This policy statement and the procedures thereunder are intended for Police Department use only. The policies, procedures, and regulations are for internal Police Department administrative purposes and are not intended to create any higher legal standard of care or liability in an evidentiary sense than is created by law. Violations of internal Police Department policies, procedures, regulations, or rules form the basis for disciplinary action by the Police Department. Violations of law form the basis for civil and/or criminal sanctions to be determined in a proper judicial setting, not through the administrative procedures of the Police Department.

Policy # 113B

Policy Name Mobile Video Recording System

Approved by Dennis Larsen, Chief of Police

Effective Date 10/24/2025

Approved Date 10/23/2025

Previous Date 07/07/2023

PURPOSE OF CHANGE:

Update procedures in compliance with CALEA standards.

POLICY:

The Mobile Video Recording System (MVRS) is a component of the Tulsa Police Digital Evidence Management System (DEMS). The MVRS is utilized to maintain trust between the Tulsa Police Department (TPD) and the citizens we serve. MVRS equipment is used to capture audio/visual(A/V) recordings of Tulsa Police operations as evidence, defend against civil litigation, investigate allegations of misconduct by Tulsa Police personnel, improve performance, and identify training needs. Pursuant to state statutes and this policy, A/V recordings may be available to the public for review. All Tulsa Police personnel using MVRS devices shall adhere to operational directives and protocols outlined herein to maximize the effectiveness and utility of the MVRS and the integrity of evidence and related A/V recordings. Personnel equipped with MVRS equipment shall record audio and video of all Police Service provided to the public and contacts with citizens expressly wishing to report misconduct by City of Tulsa personnel.

The TPD prioritizes issuing MVRS equipment to Tulsa Police personnel most likely to be involved in high-volume contacts with the public. Two types of MVRS equipment utilized by the TPD are the In-Car Camera system and Body Worn Cameras. The Chief of Police designates which work assignments require MVRS equipment. Personnel are assigned MVRS equipment subject to availability. Axon Enterprise, Inc. provides MVRS equipment for TPD.

User accounts are configured to allow Tulsa Police personnel to view their own A/V recordings. Tulsa Police Detectives and Investigators have additional permissions to view and manage video based on the investigatory and administrative responsibilities of their assignment. Personnel may not view A/V recordings outside their area of responsibility for curiosity or any other non-official purpose. Supervisors shall periodically view a sample of A/V recordings, provided by Axon Performance, of all personnel under their supervision to verify personnel are properly utilizing the system pursuant to TPD policy. Supervisors must view recordings randomly across all subordinates. Supervisors will not single out personnel to verify MVRS policy compliance. MVRS recordings are TPD records and shall only be released or exported by Tulsa Police personnel responsible for the distribution of police records pursuant to policy and law.

TPD does not seek to record private conversations, phone calls, or to generally invade citizens' or employees' privacy by recording events not specified in this policy.

SUMMARY: Procedures for the use of MVRS and resulting A/V recordings.

APPLIES TO: All police personnel.

DEFINITIONS:

ADMINISTRATIVE RECORDING – Interaction in which a citizen expressly states their desire to report alleged misconduct or policy violation of any City of Tulsa employee or an encounter an officer believes may result in a complaint.

AUDIO/VIDEO RECORDING (A/V) – Data recorded by MVRS equipment capturing audio and video recordings of Tulsa Police operations. A/V recordings are considered one type of digital evidence managed by DEMS.

AXON BODY 3 (AB3) – Axon body-worn camera equipment worn by a department member that captures both audio and video of police service provided by the TPD personnel.

AXON PERFORMANCE – a program within Axon that randomly selects videos to be viewed by supervisors and provides reporting regarding compliance with MVRS and digital evidence policies and procedures.

AXON SIGNAL – Technology installed in the police vehicle which automatically activates the recording function of the AB3 and FLEET 3 upon activation of the vehicle's emergency lights.

DEMS RECORDS SPECIALIST – Personnel assigned and trained in the operation of MVRS equipment, video duplicating methods, storage and retrieval methods and procedures, and who possess a working knowledge of the TPD Digital Evidence Management System (DEMS) and evidentiary procedures.

DIGITAL EVIDENCE MANAGEMENT SYSTEM (DEMS) – Hardware, software, communications technology, equipment, storage, policies, training, business practices, and personnel used to manage digital evidence in TPD's custody.

DIGITAL EVIDENCE MANAGER – The Tulsa Police employee responsible for the system administration, configuration, diagnosis, equipment maintenance, departmental training, and digital file management supporting the Tulsa Police DEMS.

EVIDENCE.COM – The cloud-based system from Axon used to manage Tulsa Police digital evidence.

FLEET 3 – Axon in-car video equipment permanently installed in Tulsa Police vehicles which captures audio and video.

LIVE STREAM – Also known as Axon Respond. The Axon feature that allows remote live viewing of video when the AB3 or FLEET 3 is actively recording.

POLICE SERVICE – Contact between Tulsa Police personnel and the public regarding the enforcement of any law, ordinance, or statute; or providing information or rendering assistance to the public including, but not limited to, the following:

Contact with community members in the performance of official law enforcement duties including responding to calls for service, officer-initiated encounters, arrests, traffic stops, field contacts, other actions taken in the official performance of duty, which includes emergency response driving, vehicle pursuits, vehicle stops, building and vehicle searches, individual searches and frisks, investigations of suspicious activity, searches or pursuits of fleeing suspects, collection of physical evidence of a crime, and detention or transport of any person.

REAL-TIME INFORMATION CENTER (RTIC) – A facility staffed by TPD personnel to provide real-time tactical information to support TPD operations.

SIGNAL SIDEARM – A sensor attached to a Tulsa Police officer's holster which auto-activates the officer's AB3 recording function when the weapon is drawn and the employee is within the range of Signal.

TECHNOLOGY MANAGER – The Tulsa Police employee responsible for operation, support, vendor management, maintenance, licensing, departmental training, and upgrades to support TPD systems and equipment.

PROCEDURES:

A. GENERAL PROCEDURES

1. The Tulsa Police Technology Manager and the City of Tulsa IT Department are responsible for ensuring MVRs equipment is deployed according to the manufacturer's recommendations.
2. All TPD personnel shall successfully complete the TPD-approved course of instruction prior to being assigned or operating a Tulsa Police-issued MVRs. The Tulsa Police Technology Manager or approved MVRs instructors record successful sworn employee training completion at the Training Division.
3. TPD personnel shall wear AB3 equipment in accordance with the manufacturer's guidelines. Personal mounts and non-standard AB3 mounting equipment are prohibited.
4. Fleet 3 in-car video systems are installed per the manufacturer's guidelines. Personnel shall not modify the installation or camera placement. Interior cameras shall be positioned to record the activity of police personnel and passengers.
5. Signal Sidearm devices are installed on holsters by Tulsa Police Range personnel. Tulsa Police personnel shall not tamper with the devices.
6. A/V recordings shall be stored in Evidence.com. Only the Chief of Police or designee may export recordings.
7. Internal TPD requests for copies of MVRs A/V recordings for training or non-prosecution purposes shall be directed to the Digital Evidence Manager. All requests for A/V recordings related to a prosecution, open records request, or news media request shall be directed to the Police Information and Technology Department (PITD) Records Section pursuant to Policy and Procedure 105A, *News Media/Release of Information*.
8. Once per month, personnel will dock their AB3 at one of the divisions to check for firmware updates and ensure the AB3 is up to date.

B. MVRs USE

1. TPD personnel assigned MVRs equipment shall wear and utilize the equipment pursuant to policy any time they are identifiable as a Tulsa Police Officer, while traveling to and from work, during court appearances while in uniform, and during outside employment in accordance with Policy and Procedure 313, *Off-Duty employment*.
2. At the beginning of each shift, TPD personnel will function-check their assigned MVRs equipment in accordance with training and the manufacturer's guidelines.
3. At the beginning of each shift, TPD personnel will ensure the appropriate metadata is applied to the AB3 camera and synced with the Fleet 3 system, if applicable.
4. TPD personnel are required to record all activity while executing Police Service as defined in this policy. Recording shall not be stopped until the conclusion of the event requiring MVRs activation or until authorized by a supervisor. TPD personnel involved in custodial transport shall continue recording until they are no longer in the presence of the person being transported. Intermittent recording of police service is prohibited.
5. MVRs equipment must be activated while driving with emergency lights or while driving in Code 1 vehicle operation as defined in Policy and Procedure 102A, *Vehicle Operations/Response Codes*. Recording shall continue until arrival at the event even if the initiating personnel discontinues Code 1 or emergency light operation while enroute to the scene. If Police Service is required at the scene, TPD personnel will continue MVRs recording.

6. TPD personnel must activate an MVRs when a citizen expressly communicates a desire to report misconduct by any City of Tulsa employee or a member of any other law enforcement agency. TPD personnel must report complaints against Tulsa Police employees in accordance with Policy and Procedure 304A, *Complaints Against Police Employees*. Complaints against other City of Tulsa employees will be forwarded to the Chief of Police. These A/V recordings are administrative recordings.
7. While not mandatory, TPD personnel may advise any citizen an interaction with police is being recorded.
8. The following situations are exemptions to events requiring mandatory recording outlined in Procedure B MVRs Use, 4 and 5:
 - a. Routine patrol.
 - b. Conversations with other City of Tulsa employees when Police Service is not being rendered.
 - c. Squad meetings, training, business and community meetings, personal activities, or other administrative activities unless approved by a supervisor.
 - d. Counseling, official reprimands, performance evaluations, event debriefing or critiques, administrative duties, improper conduct reported by any City of Tulsa employee regarding other employees, job performance discussion, employment status, and any other interaction between TPD personnel while not engaging in activity which requires activating a MVRs as mandated in this policy.
 - e. Casual interactions with the public not related to a criminal or administrative investigation.
 - f. While giving courtroom testimony.
 - g. When directed by a Detective responsible for the investigation of child sexual abuse material cases or any sexual assault case when a statement will be recorded by Tulsa Police equipment other than an MVRs.
 - h. While completing official reports after the conclusion of rendering Police Service.
 - i. During the performance of routine investigative duties by personnel whose assignment is other than patrol, traffic enforcement, or other positions primarily involved in responding to calls for service or providing Police Service in public settings.
 - j. Upon approval by an investigative unit supervisor or Captain or above, activity by investigative personnel in which the use of the MVRs poses safety issues to officers and the public (e.g. sensitive interviews, investigative searches and situations where tactics may be compromised).
 - k. These exemptions do not allow for discontinuing recording during events where recording is required.
9. When practical, Tulsa Police personnel shall initiate recordings prior to the execution of Police Service. In unexpected situations where an MVRs cannot be triggered due to officer safety risks, an MVRs shall be started as soon as practical and reasonable. TPD personnel will document the reason for any delay or non-activation of a mandatory event in the incident report related to the event. If an incident report is not required, the delay or non-activation shall be documented in an inter-office correspondence to the TPD personnel's division commander and included in any associated Blue Team.
10. TPD personnel must upload all recordings prior to the end of their assigned shift. TPD personnel must verify the upload of A/V recordings pursuant to training and the manufacturer's guidelines.
11. A/V recordings created outside of a TPD personnel's regularly assigned work schedule shall be uploaded as soon as practical, unless otherwise directed by a supervisor.

12. TPD personnel must indicate in official police reports, or citation notes that an A/V recording was captured. TPD personnel shall attach the incident report number to the A/V recording file in Evidence.com in the ID field. The CAD incident number associated with the incident prompting the A/V recording will be attached if an incident report is not completed. Other acceptable labels include: if a citation is issued, the citation number will be entered with a C before the number, Internal Affairs investigations can use the IA file number, training files will be labeled TRAINING and a 6-digit number and accidental activations will be labeled ACCIDENTAL. See TOG 2006 for additional labeling instructions. The location of the occurrence will be put in the Title field.

13. TPD personnel may review their or other employees' A/V recordings for accurate reporting purposes.

14. The retention period for all A/V recordings is 26 months from the date of the recorded incident. TPD personnel with supervisor approval may request that any A/V recording be classified for permanent retention or for restricted viewing. TPD personnel receiving information that any TPD record, including A/V recordings, is subject to a court order for a litigation hold, other court-mandated retention, or expungement shall forward the notice to the City of Tulsa Legal Department and the PITD Records Section.

15. Certain A/V recordings shall be designated for permanent retention and restricted viewing. These include:

- a. Recordings depicting the use of deadly force;
- b. Recordings of the death or serious injury of any person; and
- c. Recordings related to any internal or criminal investigation of police employees.
- d. The supervisor of the investigative unit in charge of the case shall verify the A/V recording is properly categorized.

C. MVRS DIGITAL EVIDENCE ADMINISTRATION

1. All internal or external requests, including subpoenas and discovery requests, for A/V recordings from a prosecuting authority in any municipal, state, tribal, or federal court; or from an outside law enforcement agency shall be submitted to the PITD Records Section. Requests will be forwarded to a DEMS Record Specialist for processing. Expedited requests due to exigent circumstances will be made to the PITD Digital Evidence Manager.
2. Open records requests must be submitted to the PITD Records Section pursuant to Policy and Procedure 105A, *News Media/Release of Information*. The Digital Evidence Manager and DEMS Record Specialists shall redact A/V recordings pursuant to the Oklahoma Open Records Act.
3. The PITD Records Section shall only fulfill requests for digital evidence that are compliant with TPD policy regarding the release of information and subpoenas; or when directed by the Chief of Police or designee. The Digital Evidence Manager, with approval of the PITD Technology Manager, shall copy or make available A/V recordings when requested by a supervisor for training purposes or administrative investigation.
4. The PITD Records Section will maintain a log of all A/V recordings which are copied or released.
5. In the event of an unintentional or accidental recording not required by this policy such as a restroom break, meal break, or in a situation where a reasonable expectation of employee privacy exists, police employees can request the deletion of the A/V recording. An interoffice correspondence detailing the circumstances of the unintentional recording will be forwarded via the chain of command to the appropriate Division Commander and copied to Internal Affairs. If the Division Commander approves, the request will be forwarded to the PITD Information Technology Director. Upon concurrence of the Special Projects Division Commander, an order will be forwarded to the Technology Manager from the PITD Information Technology Director to delete the unintentional recording. If the unintended A/V recording is likely to cause embarrassment to a police employee or other person, any person involved in the incident may request that the recording be reviewed by command-level personnel of the same gender. The A/V recording will be classified as "restricted" until a decision regarding deletion is rendered.

6. PITD will conduct an annual administrative review of the MVRS system and submit it to the Chief of Police for review.

REGULATIONS:

1. The PITD Technology Manager will oversee the daily operations of the MVRS.
2. TPD personnel must immediately report any malfunction of MVRS equipment to a supervisor. TPD personnel must transport a vehicle with a malfunctioning Axon Fleet 3 system to the City of Tulsa Radio Shop for repair as soon as practical. TPD personnel shall return malfunctioning AB3 equipment to the PITD and obtain a replacement as soon as practical. When TPD personnel experience a malfunction outside of normal business hours, administrative personnel from the personnel's assigned division will facilitate delivery of equipment for repair or replacement during business hours.
3. A shift commander may approve personnel to work without MVRS equipment for short periods outside of normal business hours due to an equipment malfunction. When practical, the shift commander will assign the personnel to partner with personnel assigned functional MVRS equipment.
4. Supervisors shall conduct a quarterly review of 2 A/V recordings of each TPD employee under their permanent or temporary supervision. These videos will be randomly selected by Axon Performance and sent to each supervisor. The purpose of the review is to (1) confirm A/V recordings are captured and managed in compliance with training and this policy (113B); (2) confirm proper entry of tags and titles; (3) review personnel performance to identify training and development needs; and (4) commend exemplary performance. Supervisors shall only review A/V Recordings for the purpose of investigating policy violations when reasonable suspicion of a policy violation exists or pursuant to the assigned investigation of an official complaint.
5. Only authorized personnel and Real Time Information Center (RTIC) personnel are authorized to live stream A/V recordings. Live Streaming capabilities may only be utilized in the event of a reasonable concern for the immediate safety of an officer, a large-scale critical incident where immediate tactical intelligence is needed (e.g. active shooter), or at the request of an officer who feels that their camera needs to be monitored live due to extraordinary circumstances. When an officer's MVRS is being used to live stream an incident, the personnel activating the live stream will announce on the radio the function has been activated if such announcement does not interfere with emergency radio communications.
6. Distribution or allowing non-TPD personnel to view, duplicate, record, copy in any manner, or possess A/V recordings which have not been released pursuant to a subpoena, court order, open records request, request from a prosecuting agency or outside law enforcement agency, or without permission of the Chief of Police, or designee, is expressly forbidden.
7. TPD personnel are prohibited from making copies of any recordings for personal use and are prohibited from using any personal recording device (such as a phone or secondary video camera) to record an A/V recording.
8. Any tampering or obstruction to any degree with intent to: (1) interfere or disable MVRS equipment from capturing audio and video; (2) interfere or disable auto-triggering of the AB3 or FLEET 3 devices; or (3) interfere with A/V management is expressly forbidden. The destruction, alteration or deletion of any A/V recording except as prescribed in Regulation 11 or in accordance with City of Tulsa retention policy is prohibited.
9. TPD personnel shall not intentionally record activities of other TPD personnel not mandated by this policy without their knowledge. Unless a pre-existing investigation is authorized by the Chief of Police or designee, the recording of routine non-enforcement TPD activities or conversations occurring in Tulsa Police facilities, and other areas where a reasonable right to privacy exists is prohibited. Notification to other TPD personnel of the activation of an MVRS device pursuant to this policy is not required.

10. When a TPD employee is subject to internal administrative or criminal investigation, the employee and their representative or legal counsel shall be given an opportunity to review all relevant recordings prior to being questioned.
11. The on-duty use of unauthorized, personally owned A/V recording devices that work in a similar fashion to either the AB3 or the Fleet 3 system, to record enforcement action is strictly prohibited.
12. TPD personnel shall use MVRS equipment, including auto-triggering devices, in accordance with this policy. Personnel will not use MVRS equipment to engage in any horseplay or behavior for the purposes of harassing any person due to their race, color, religion, national origin, ancestry, disability, ideology, or sexual orientation.
13. Any exceptions to this policy must be approved in writing by the Chief of Police or designee.
14. Internal Affairs shall perform an investigative review of A/V data during an organizational integrity incident, administrative or criminal investigation.

REFERENCES:

102A, *Vehicle Operations/Response Codes*
105A, *News Media/Release of Information*
107, *Personal Searches*
112H, *Vehicle Searches, Impounding Vehicles, Inventory Searches*
304A, *Complaints Against Police Employees*
305A, *Overtime and Processing Subpoenas*
313, *Off-Duty Employment*
TOG 2006, *Capture and Submission of Digital Evidence*
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