



MEMORANDUM

Date: January 2, 2026

To: The Honorable Chair and Members
Pima County Board of Supervisors

From: Jan Leshner *Jan Leshner*
County Administrator

Re: **Data Governance Council Review and Recommendations – Axon Contract Amendment**

The Data Governance Council (DGC), chaired by the Information Technology Department, led a comprehensive review of Amendment No. 01 to Supplier Contract SC2400001268 with Axon Enterprise, Inc. This review was conducted in collaboration with the Pima County Sheriff's Department (PCSD), Legal, and Procurement teams to address concerns raised during the December 16, 2025 Board of Supervisors meeting. The goal was to ensure that the amendment meets Pima County's standards for data security, ownership, compliance, and ethical Artificial Intelligence (AI) governance.

As the primary advisory body for data governance, the DGC ensures that all technology agreements align with Criminal Justice Information Services (CJIS), System and Organization Controls 2 (SOC 2), and ethical Artificial Intelligence (AI) standards. For this amendment, the Council coordinated technical and legal evaluations, validated Axon's security posture, and confirmed that contractual safeguards protect both sensitive data and civil liberties.

Review Summary

The Data Governance Council's review confirmed that Pima County retains full ownership of all Customer Content and Provided Data, with Axon holding rights only to Transformed Data under the optional Taser Data Science Program. All County data is hosted in Microsoft Azure Government Cloud, secured with industry-standard security best practices, and protected by role-based access controls, multi-factor authentication, and tamper-resistant audit logs. Legal provisions prohibit Axon from releasing County data except under lawful process, with mandatory notification and cooperation for protective orders. The Axon AI Appendix in the proposed amendment introduces strong safeguards, including oversight by Axon's Ethics & Equity Advisory Council, bias mitigation and testing, human review of outputs, and a prohibition on training AI models with County content by default. Axon follows strict security and privacy standards used by law enforcement and industry best practices. These include federal criminal justice rules and widely recognized technology security frameworks.

Recommendations

To strengthen oversight and mitigate emerging risks, the Council recommends implementing quarterly audits of Axon access logs and security reports and conducting an assessment of Axon's AI capabilities through the Data Governance Council's AI subcommittee. The Data

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Governance Council will pursue mandating a 24-hour breach notification window, conducting joint incident response exercises, enforcing explicit approval for any cross-agency data sharing, and performing annual sunset reviews of optional programs such as the Taser Data Science initiative.

Next steps include implementing quarterly audits under DGC leadership, enforcing annual security certifications, and monitoring AI governance compliance. Delivery of Axon's SOC 2 Type II report and penetration test results will complete final verification.

All recommendations will be addressed at the subsequent Data Governance Council meeting.

Conclusion

The Data Governance Council affirms that Amendment No. 01 addresses the Board's concerns regarding data security, ownership, compliance, and AI governance. ITD's role in the Data Governance Council and collaboration with PCSD will continue to ensure that these protections are robust and continuously monitored. The above recommendations will further enhance transparency, accountability, and risk management.

JKL/anc

c: Carmine DeBonis, Deputy County Administrator
Steve Holmes, Deputy County Administrator
Javier Baca, Director, Information Technology