

GENERAL
ORDER

Las Vegas Metropolitan Police Department

Partners with the Community

TO : ALL PERSONNEL	Aug 28, 2014	Directive No. GO-009-14 Supp No 2
SUBJECT : BODY WORN CAMERAS		Effective Date IMMEDIATELY
Additional Information :	Changes appear in <i>italics</i> ; deletions appear struck out . Initiated by Body Camera Detail, Patrol Operations Support. Policy revised to address issues identified during initial phase of deployment and to align policy with national guidelines.	
Accreditation Standards :	Dept. Manual Reference:	4/107.01
Approval Signature :	Douglas C. Gillespie, Sheriff Jim Dixon, Undersheriff	

The purpose of this policy is to establish guidelines for the proper use, management, storage and retrieval of video and audio data recorded by body worn cameras (BWC).

It is the policy of this department to use body worn cameras as an effective law enforcement tool thereby reinforcing the public's perception of our professionalism and transparency. BWCs have the potential to improve community relations, lower the number of citizen complaints, defend officers against false accusations, increase agency accountability, and improve officer training and evaluation.

BWCs record officer-citizen contacts, arrests, and critical incidents. BWCs also serve to enhance the accuracy of officer reports and testimony in court. Audio and video recordings enhance this department's ability to review probable cause for arrest, officer and suspect interaction, and evidence for investigative and prosecutorial purposes. BWCs may also be useful in documenting crime and accident scenes or other events that include the confiscation and documentation of evidence or contraband. This policy does not govern the use of surreptitious recording devices used in specialized operations.

All officers hired on or after July 1, 2013 are required to wear a BWC (based on assignment). Officers hired prior to July 1, 2013, may voluntarily wear a BWC.

It is the policy of the department to respect the legitimate privacy interests of the citizens and visitors of Clark County, while ensuring professionalism in its work force.

Body Worn Cameras (BWC) are an effective tool to preserve factual representations of officer-citizen interactions. BWC are effective in capturing video *and audio* evidence for use in criminal and internal investigations, enhanced officer training and to ensure public trust.

The purpose of this policy is to establish guidelines for the use, management, storage and retrieval of video and audio data recorded by body worn cameras.

DEFINITIONS

Body Worn Camera (BWC) – *A mobile audio and video capture device that allows an officer to record what is seen and heard. The TASER Axon Flex camera system is the only department authorized and approved BWC* ~~A camera worn on an individual officer's person which audio and video records officer-citizen interaction.~~

Categorizing – a method to mark and store a BWC recording for a specific purpose and period of time.

Digital Evidence – Includes photographs, audio, and video recordings that are stored digitally.

Evidence Transfer Manager (ETM) – A docking station for the AXON Flex camera and battery. When the camera is docked, video data stored on the camera is automatically downloaded to Evidence.Com. The ETM also charges the battery and camera.

Labelling – the process of attaching an LVMPD event number in the Title field and the 400 code in the ID field of a BWC recording.

LVMPD.Evidence.com – A secure, “cloud” based storage system which is *managed by the Body Camera Detail (BCD)*, externally hosted *by TASER International*, and available to all users. Evidence.com is used to organize, classify, manage, view, and archive digital evidence. Evidence.com tracks and provides an audit log of all activity to protect chain of custody.

“Sync” Application – A stand-alone program residing on a department computer that accomplishes the same function as the ETM. The Sync Application is only for use by officers that don’t have access to an ETM.

GENERAL PROCEDURE

Officers will activate the BWC when such use is appropriate to the proper performance of duties, where the recordings are consistent with this policy and law, as soon as practical and safe, to record all contacts with citizens in the following occurrences:

1. *Vehicles stops;*
2. *Person stops: consensual, articulable reasonable suspicion, or probable cause;*
3. *All dispatched calls for service involving contact with citizens;*
4. *Detentions, investigations pursuant of an arrest, arrests, suspect interviews, and post-Miranda interrogations (in the field only);*
5. *Search of persons incident to arrest (if not already activated);*
6. *Search warrants of structures or vehicles;*
7. *K9 searches requested by a Patrol officer;*
8. *Code 3 driving;*
9. *Pursuits: primary and secondary officers;*
10. *Any contact that becomes adversarial when body camera had not been activated;*
11. *Transport of Code 5 prisoners;*
12. *Any other citizen contact or official duty circumstance at the officer’s discretion.*

~~All officers hired on or after July 1, 2013 are required to wear a BWC (based on assignment). Officers hired prior to July 1, 2013, may voluntarily wear a BWC.~~

~~The TASER Axon Flex camera system is the only department authorized and approved BWC. This BWC will only be used by officers who have been trained in the operation of this system. The Supply Section will issue and account for all BWC within the Police Equipment Tracking System (PETS). Upon transfer to an assignment where a BWC is not worn (or separation from the department), officers must turn in the BWC to Supply Section.~~

~~Activation of the BWC is not required during periods of unassigned time, breaks or lunch periods, or when not in service.~~

~~NOTE: The TASER Axon Flex camera system is configured with a 30 second pre-event video buffer recording. When the BWC is activated, the preceding 30 seconds of video (no audio) will be captured and become part of the event recording. Audio recording will begin at the time the BWC is activated.~~

~~Unless otherwise unsafe or impractical to do so, officers utilizing BWC shall activate the BWC as soon as practical in the following occurrences:~~

1. ~~Vehicles:~~
 - a. ~~All Stops occupied or unoccupied;~~
 - b. ~~Code 3 Driving;~~
 - c. ~~Pursuits primary or secondary.~~
2. ~~Persons:~~
 - a. ~~All Stops- consensual, reasonable suspicion or probable cause;~~

- ~~b. All dispatched calls for service;~~
- ~~c. Arrests and detentions;~~
- ~~d. Any contact that becomes adversarial when body camera had not been activated;~~
- ~~e. Transporting Code 5 prisoners;~~
- ~~f. Any contact of the officer discretion.~~
- ~~3. K9 searches.~~
- ~~4. Search warrant service of a structure.~~

NOTE: ~~Officers are not required to advise or obtain consent to video/audio record.~~

Officers are not required to obtain consent to video/audio record (except in the case of victims or witness as addressed below). Whenever possible and practical, officers should inform individuals that they are being recorded. Officers should restrict recording to areas and persons necessary in order to obtain evidence and information relevant to the incident and should attempt to minimize collateral intrusion to those not involved.

The BWC will not be used to record a formal statement from a victim or a witness. If an officer is approached by a victim or a witness who are giving their first account of a crime the officer may record the encounter but the needs of these individuals and the sensitivity to the nature of the crime being reported should be considered in deciding to continue recording. Officers should ensure that the victim or witness provides the following information, if applicable, in their first account statement of the crime:

- *Need for medical assistance;*
- *Nature of the incident;*
- *Identity of the suspect (if known);*
- *Location of the suspect (if known);*
- *Description of the suspect;*
- *Time of the offense;*
- *Location of the crime scene;*
- *Identification of possible evidence;*
- *Activities since the crime took place;*
- *Identity of witnesses.*

Officers will not permit victims or witnesses to review any BWC recording before making a first account statement. Officers will document the consent or non-consent on the recording at the time of the first account statement. In the case of crimes, such as sexual assault, where sensitivity to the victim is paramount, officers must get the explicit permission for recording of the first contact statement from the victim and this will be documented on the recording. If the victim is in anyway unsure of the need for the recording to be made or is uncomfortable with the thought of being recorded then the officer should not record the statement. If a victim or witness does not consent to being recorded on any event the officer may consider the option to divert the camera away from the subject and recording only audio.

Activation of the BWC is not required during periods of unassigned time, breaks or lunch periods, or when not in service.

Once the BWC is activated, recording will continue until the event has concluded; the following are exceptions:

1. *The event is of a sensitive nature, i.e. child sexual assault, presence of child pornography, etc., and the absence of a BWC recording will not affect the investigation;*
2. *The incident has concluded prior to the arrival of the officer;*
3. *The incident or event is of such duration that deactivating the BWC is necessary to conserve available recording time;*
4. *The officer has a reasonable belief there will be no loss of critical documentary information (for example, completing reports at the conclusion of an event, etc.);*

5. A citizen has requested the *officer stop recording* BWC be turned off within their home. Officers have no obligation to stop recording in response to a citizen's request *if the recording is pursuant to an investigation, arrest, lawful search, or the circumstances clearly dictate that continued recording is necessary. However, officers should but may* evaluate the situation and when appropriate, honor the citizen's request. The request to turn the camera off should be recorded, *as well as the officer's response.*
6. A citizen with standing has requested the *officer stop recording* BWC be turned off within their home residence and the officer's presence is not pursuant to an investigation, arrest, lawful search, or the circumstances clearly dictate that continued recording is necessary. As a general rule, *if an officer must legally ask permission to enter a premise, the officer should also ask the resident with standing if they will allow recording. The request to turn the camera off should be recorded, as well as the officer's response.*

Deactivation of the BWC shall occur when:

1. The event has concluded;
2. Victim and/or witness contact has concluded;
3. All persons stopped have been released;
4. Once an arrestee has been placed into a vehicle to be transported to a detention facility, except when transporting Code 5 prisoners.

The BWC will only be used by officers who have attended department approved training on the operation of the system. The Supply Section will issue and account for all BWC within the Police Equipment Tracking System (PETS). Upon transfer to an assignment where a BWC is not worn, or separation from the department, officers must return the BWC to the Supply Section.

CAMERA DEPLOYMENT

- A. At the beginning of shift, the officer will:
 1. Ensure that the issued equipment has a fully charged battery and is functioning properly;
 2. Notify a supervisor whenever there is a malfunction or damage to the BWC and document the malfunction/damage in PETS.
- B. During shift, the officer will:
 1. Activate the BWC *and record as outlined stated* in GENERAL PROCEDURE above;

NOTE: The TASER Axon Flex camera system is configured with a 30 second pre-event video buffer recording. When the BWC is activated, the preceding 30 seconds of video (no audio) will be captured and become part of the event recording. Audio recording will begin at the time the BWC is activated.
 2. *All BWC recordings will initially be unlabeled and uncategorized and will be auto-deleted by the system unless the officer does one of the following:*
 - a. *If a recording needs to be retained the recording officer will label the recording with the event number in the Title field and the 400 code in the ID field. The recording will then be categorized by one of the following:*
 - 1) *Felony arrests;*
 - 2) *Misdemeanor arrests;*
 - 3) *Misdemeanor citations;*
 - 4) *Traffic citation with violation;*
 - 5) *Misdemeanor DUI arrests;*
 - 6) *Adverse citizen contact;*
 - 7) *Use of force – no arrest;*
 - 8) *Pursuit – no arrest;*
 - 9) *OIS deadly force.*
 - b. *If a recording needs to be retained, either for the officer's reference or for investigative or follow-up purposes, but does not fall into one of the above categories the officer needs to label the recording with the event number in the Title field and the 400 code in the ID field. If*

applicable, the officer is then responsible to contact the appropriate detective, investigative detail or specialized unit to advise them that a recording exists;

NOTE: Recordings should be labeled and/or categorized as soon as practical after the conclusion of the event but no later than the end of the shift in which the recording occurred.

~~Tag BWC recording as appropriate prior to the end of shift. See below, CATEGORY AND RETENTION SCHEDULE for tag categories;~~

3. Document the existence of a *BWC video/audio* recording in all of the appropriate documents, i.e., Declaration of Arrest, Arrest Report, Incident Crime Report, Citation, Field Interview Card, Officers Report, CAD, etc. *Officers will select "On-Officer Video" from the choices in the "Connecting Reports" section near the bottom of the "Administrative" tab page for PI reports. Officers will also write "Body Camera Recording Available" on the first line of all report narratives.* Documenting the existence of video will be done on the first line of all reports ~~completed.~~ *Do not substitute "refer to video" or other similar language in place of a detailed and thorough report. Officers should avoid using exact quotes, but should represent statements in their reports as a summary of what is contained in the BWC recording;*
- ~~4. Update CAD if an incident is not recorded due to BWC malfunction or damage;~~
5. Notify investigative *or specialized unit* ~~section~~ personnel of the existence of BWC recordings during critical incidents. This shall also be noted in the Major Incident Log;
6. Not allow citizens to review BWC recording in the field. Citizens requesting to view BWC recording will be referred to IAB;
- ~~7. Not use the BWC to record any personal conversation of or between other department employees without the recorded employee's knowledge. Department policy 4/103.24, Covert Mechanical Recordings, shall be strictly adhered to. In addition, the BWC shall not be used to record non-work related personal activity and will not be activated in places where a reasonable expectation of privacy exists, such as locker rooms, dressing rooms or restrooms;~~
8. ~~BWC shall not be used during major crime investigative briefings without ranking ISD/HSD personnel approval.~~
9. *Continue to record for a short period after the event to demonstrate clearly to a subsequent viewer that the incident has concluded and the officer has resumed other duties or activities;*
10. *If an officer fails to activate the BWC, fails to record the entire contact, interrupts the recording, or the BWC malfunctions, the officer will document the circumstances and reason for that action as a closing comment to the event on the MDT and in any applicable reports.*

C. Supervisor responsibilities:

1. *Ensure all BWC officers utilize the cameras in accordance with this policy* ~~Ensure all officers who have been issued the BWC are equipped prior to the beginning of shift;~~
2. Ensure any malfunction or damage to a BWC unit is documented in PETS. The supervisor will remove the BWC from service and contact *Body Camera Detail* ~~ITB~~ to have the BWC repaired;
3. *Access BWC recordings during the course of duties in accordance with the INTERNAL DATA ACCESS AND VIEWING section of this policy* ~~When receiving a complaint alleging misconduct by an employee assigned a BWC, the supervisor will review the BWC recording, if available, to determine if misconduct occurred. Allegations of misconduct or complaints against officers will be addressed as outlined in policy 5/101.26. If not already tagged, the supervisor will ensure that the BWC recording is tagged pursuant to the CATEGORIES AND RETENTION SCHEDULE below.~~

D. Restrictions

BWC shall be used only in conjunction with official law enforcement duties. The BWC shall not be used to record:

1. *Any personal conversation of or between other department employees without the recorded employee's knowledge (see Covert Mechanical Recordings, 4/103.24);*
2. *Non-work related personal activity and will not be activated in places where a reasonable expectation of privacy exists, such as locker rooms, dressing rooms or restrooms;*
3. *Major crime investigative briefings without ranking ISD/HSD personnel approval;*
4. *Encounters with undercover officers or confidential informants;*

5. *Departmental meetings, workgroups, in-service training, or assignments of an operational or administrative nature. Using body cameras for training purposes such as AOST or RBT is not a violation of this restriction.*

INTERNAL ACCESS/VIEWING

All access and activity on Evidence.com is logged and subject to audit at any time. Access to Evidence.com and the data stored in the system is permitted on a right to know, need to know basis. Personnel authorized under this policy may only view video data according to the provisions of this policy and as designated by the Systems Administrator, the Sheriff or his designee.

BWC video can be viewed on a mobile device, mobile data terminals in patrol cars, and on computer work stations. Once uploaded to LVMPD.Evidence.com, authorized personnel may view BWC recordings on a department computer by logging in to the system and documenting the reason for access in the "NOTES" section prior to viewing any data.

- A. OFFICER ACCESS - Officers may view their own BWC recordings as they relate to:
 1. Their involvement in an incident for the purposes of completing an investigation and preparing official reports. To help ensure accuracy and consistency, officers are encouraged to review the BWC recording prior to preparing reports;
 2. Prior to court to refresh recollection. NOTE: Officers will ensure that the prosecuting attorney is aware *the BWC recording video* was reviewed;
 3. Providing a statement pursuant to an internal investigation, including officer involved shooting investigations and other critical incidents. NOTE: Following an officer involved shooting or other critical incident, involved personnel shall not view their *BWC recording video* on any device or computer prior to the *BWC recording video* being uploaded into Evidence.com.

- B. SUPERVIOR ACCESS - *Supervisors do not have direct access to an officer's BWC video through LVMPD.evidence.com. Supervisors may view BWC recordings from personnel under their supervision in the following instances:*
 1. *Supervisory investigation following the application of reportable force (except use of deadly force). Supervisors will access the video on scene in the presence of the involved officer(s) through a mobile device, any MDT, or at a computer station in the area command. If an involved officer(s) is unavailable at the scene, the supervisor will review the video with the officer as soon as practical prior to the Use of Force report being completed. Supervisors will ensure they document their review of the BWC video in the narrative of their investigative comments. Supervisors will ensure that the video is labeled and categorized in accordance with this policy.*
 2. *Supervisory response to a citizen request to file a statement of complaint. Supervisors will handle receipts of complaints in accordance with LVMPD Policy 5/101.26, Section 2, sub-section IV. Supervisors will first interview the complainant before reviewing any available BWC video that recorded the alleged violation. Supervisors will access the video on scene through a mobile device or any MDT. Review of the recording will not happen in the presence of the complainant. If the allegation is not a violation of policy or law the supervisor will notate in the Blue Team Citizen Contact that BWC video is available, was reviewed, and is one of the justifications for the Citizen Contact Report. If the allegation appears to be valid the supervisor will notate in the narrative of the Statement of Complaint that BWC video is available, was reviewed, and is one of the justifications for the Statement of Complaint.*
 3. *During the course of an internal investigation forwarded from IAB to the bureau for completion. In these instances, the video will be sent from IAB to the bureau as an attachment to the investigative packet.*
 4. *To assist in appropriately addressing a clearly documented performance issue. In such cases the supervisor will discuss the issue with the supervising lieutenant who will review the circumstances and, if appropriate, retrieve the video from LVMPD.evidence.com and forward it down to the supervisor.*

~~C. ACCESS VIEWING/PRESERVING DATA/CRITICAL INCIDENTS~~

- ~~a. When safe and practical to do so, an on scene supervisor shall retrieve the BWC from involved and witness officers at the scene. The supervisor will be responsible for assuring the BWC is docked and uploaded into Evidence.com;~~
- ~~b. Following an officer involved shooting, use of deadly force or other critical incident, BWC recordings may only be viewed prior to being uploaded in Evidence.com when exigent circumstances exist, such as an officer being injured and in order to obtain identifying suspect information or other pertinent information from the BWC recordings;~~
- ~~c. FIT, CIRT, and/or IAB personnel may view BWC recordings in order to assist in an investigation.~~

~~D. SUPERVISOR ACCESS - Supervisors may view BWC recordings from personnel under their supervision. BWC recordings may be periodically reviewed by supervisors to:~~

- ~~a. Monitor officer performance;~~
- ~~b. Ensure the BWC is being operated and utilized properly;~~
- ~~c. Identify training issues;~~
- ~~d. After notification of an EHP Flag or as part of routine EHP dashboard reviews.~~

~~NOTE: A supervisor's review of BWC recordings that identifies a minor performance deficiency should generally be viewed as an opportunity to provide counseling and/or additional training to correct that deficiency. If the performance deficiency is not corrected through training and/or counseling, the appropriate disciplinary and/or corrective action shall be taken.~~

C. ACCESS AT CRITICAL INCIDENTS

1. *When safe and practical to do so, an on scene supervisor shall retrieve the BWC from involved and witness officers at the scene. The supervisor will be responsible for assuring the BWC is docked and uploaded into Evidence.com. The retrieving supervisor will ensure that all reports on the incident indicate the name and P# of the supervisor;*
2. *Following an officer involved shooting, use of deadly force or other critical incident, BWC recordings may only be viewed prior to being uploaded in Evidence.com when exigent circumstances exist, such as an officer being injured and in order to obtain identifying suspect information or other pertinent information from the BWC recordings;*
3. *FIT, CIRT, and/or IAB personnel may view BWC recordings in order to assist in an investigation.*

D. ACCESS BY INVESTIGATIVE PERSONNEL - *Internal Affairs Bureau personnel will not access and search BWC recordings for offenses committed by users unless pursuant to an official complaint.* Personnel assigned to ~~internal~~ and criminal investigative sections may view BWC recordings as part of their review or investigation of the incident.

E. TRAINING ACCESS - In instances where a BWC recording contains material that is beneficial for training purposes, the recording may be used only after approval from the Sheriff or his designee.

F. LEGAL ACCESS - Personnel in the Office of General Counsel/Risk Management may view BWC recordings as part of their review or investigation of the incident.

EXTERNAL ACCESS

- A. JUVENILE RECORDINGS - It is recognized that video images of juvenile offenders will at times be recorded by the BWC when responding to calls for service or during the course of an investigation. Because of this, officers shall protect video recordings of juveniles the same as still photographs of juveniles. If a department employee has a need to use BWC recorded images of juvenile offenders as part of an investigation, the department employee shall strictly adhere to 5/203.02,

Photographing/Fingerprinting of Juveniles. *Juvenile victims or witnesses to a crime will only be recorded with the permission of a parent or legal guardian present at the time of the recording. This permission must be documented on the recording. If consent is not given to being recorded the officer may consider the option to divert the camera away from the subject and recording only audio.*

- B. REQUESTS FOR VIDEO/AUDIO PURSUANT TO NEVADA'S OPEN RECORDS ACT - Nevada law allows for the public to request to inspection and/or copies of public records. Whether a BWC recording is a public record will depend on several factors. Additionally, the character of a recording may change from non-public to public. As general guidance for release of video/audio please note the following:
1. Evidence is not a public record;
 2. Video recordings (photographs) of juvenile offenders are confidential pursuant to NRS §62H;
 3. Video/audio recordings obtained within a non-public area (home or non-public area of a business) are not a public record. *See, Wilson v. Layne*, 526 U.S. 603, 614 (1999);
 4. Photographs of police officers may not be released by the department unless the officer has consented in writing. NRS §289.025;
 5. Video/audio recordings obtained depicting a victim of sexual assault in such a way that their identity may be ascertained is not a public record. NRS §200.3771;
 6. Video containing data of the report or investigation of abuse, neglect, exploitation or isolation of older persons or vulnerable persons are not public records. NRS §200.5095;
 7. Any other laws making the identity of the person(s) depicted confidential;
 8. Any other privacy concerns giving the person(s) depicted a legitimate privacy interest in not having video/audio data released.

The release of any BWC recordings to media outlets will be in strict compliance with this and department policy 5/107.24, News Media and Public Information.

DATA STORAGE, SECURITY AND ACCESS

A. GENERAL

1. The Body Camera ~~Detail Unit~~ (BCU) is responsible for the storage and security of BWC recording files;
2. *Any and all images, video, and/or audio generated by any BWC are the sole property of the Las Vegas Metropolitan Police Department;*
3. Unauthorized use, duplication, and/or distribution of BWC recordings files are prohibited;
4. Employees shall not download, copy, or record BWC recordings from Evidence.com onto any computer, device, drive, CD/DVD, or any other format without the express written consent of the Sheriff or his designee. Only trained LVMPD personnel shall operate the BWC;
5. Employees shall not remove, dismantle or tamper with any hardware/software component or part of the BWC. Employees shall not attempt to erase or alter in any manner, BWC recordings file;
6. Evidence.com shall only be accessed from LVMPD authorized computers. Access to Evidence.com from a home, personal, or non-departmental mobile device is prohibited. EXCEPTION: Administrative users of Evidence.com may access Evidence.com from a computer or device outside the department for the purpose of completing administrative tasks, such as locking or unlocking users, etc.;
7. Employees shall not publish or display BWC recordings to the internet or social media sites, in accordance with department policy 4/110.02, Improper Use of Electronic Communication Devices;
8. IAB personnel may allow citizens, arrestees or violators to view BWC recordings as part of an investigation into an allegation of misconduct;
9. BWC recordings shall not be used or shown for the purpose of ridicule or embarrassment.

B. CATEGORY AND RETENTION SCHEDULE

The retention period begins from the date the BWC recording was labeled or categorized. Unlabeled or uncategorized recordings will be auto-deleted at 45 days. Department administrators, in addition

to the recording officer, may label or categorize recordings for retention.

~~Officers will identify or “tag” an event recording as one of the following below designated categories within the Evidence.com digital evidence management system. Officers shall also include the event number or citation number where appropriate. To help ensure reporting accuracy, officers are encouraged to tag event recordings as soon as practical following the conclusion of the event.~~

~~Tagged recordings will be retained according to the retention schedule. The retention period will begin the date that the BWC recording is tagged. Department Administrators may also tag BWC recordings for retention.~~

Category ~~ies~~ and Retention Schedule

- OIS/Deadly Force/*Homicide* 7 Years
- Felony/GM Arrest 2 Years
- Misdemeanor Arrest *or Citation* 1 Year
- ~~• Misdemeanor Citation 1 Year~~
- Traffic Citation with violation captured 120 Days
- Use of Force (Low Level/Intermediate) 90 Days
 - If arrest is made, arrest retention schedule overrules
- Pursuit 90 Days
 - If arrest is made, arrest retention schedule overrules
- Uncategorized (no tag) 45 Days

~~All BWC recordings not tagged for retention will automatically purge 90 days from the date of recording. All BWC recordings being retained for longer than 90 days will be automatically moved to cold storage. (3/14, 8/14)■~~

KJ