

VIRGINIA ALCOHOLIC BEVERAGE CONTROL
BUREAU OF LAW ENFORCEMENT



QUARTERLY REPORT

2nd Quarter - 2022
April 1st through June 30th

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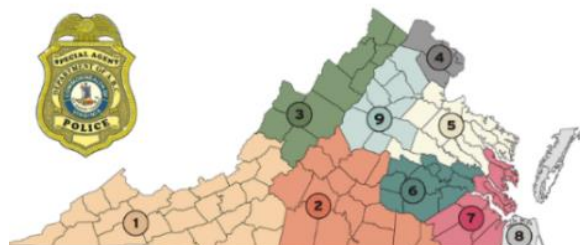
Executive Summary

The Governor's Expert Panel gave clear directions on the content of this quarterly report. This report follows those basic guidelines. Listed below is a synopsis of the data reported in each of those areas:

1. **Criminal Violations** – There were 103 charges placed this quarter with 68 (66%) charges related to alcohol violations. Last quarter there were 4 charges placed with 1 (25%) charge being alcohol related. Arrests are up significantly compared to last quarter.
2. **Regulatory violations** – This quarter saw a 376% increase in violations brought to hearings and an 810% increase in written warnings when compared to 1Q 2022. There was an 81% decrease in regulatory charges adjudicated in hearings with 59 in 1Q 2022 and 11 in 2Q 2022.
3. **Field Contacts** – There were no field contacts made this quarter.
4. **Planned Operations** – There were no planned operations this quarter and three in the first quarter of 2022.
5. **Use of Force Reports** – There were no reported Use of Force incidents this quarter.
6. **Internal Investigations** – There are currently four open Internal Investigations. There were no informal complaints assigned to the field.
7. **License Activity** – Retail approvals are up 28% for the second quarter of 2022 compared to the previous quarter. Retail license approvals are up 27% when compared to the second quarter of 2021. Banquet license approvals show a 54% increase when compared to the previous quarter and a 138% increase when compared to the second quarter of 2021.
8. **Inspections/Observations** – Inspections showed an increase of 21% when comparing second quarter of 2022 to the first quarter of 2022, and a 14% decrease when compared to the second quarter of 2021. Observations are up 83% when comparing the second quarter of 2022 to the previous quarter.
9. **Underage Buyer** -UAB alcohol checks and tobacco checks were reinitiated this quarter. There were 500 Alcohol checks made and 173 Tobacco checks. The compliance rate for Alcohol checks for the quarter is 85% and the compliance rate for Tobacco checks is 76%.
10. **Training and Community Outreach** – ABC presented over 517 hours of training to law enforcement, licensees, and the general public this quarter. There were 361 hours of training received by ABC agents. These agents also attended over 968 hours of community outreach meetings.
11. **Accreditation** – Re-accreditation for VA ABC was accomplished on January 9th, 2021. A 2nd reaccreditation term began on November 1st, 2019 and will end on January 31st, 2023. All 190 standards have completed or in progress proofs for the quarter.

Most of the above data will be broken down by region. The map below outlines Virginia by region:

Region 1-Roanoke, Region 2-Lynchburg, Region 3-Stauanton, Region 4-Alexandria, Region 5-Fredricksburg, Region 6-Richmond, Region 7-Hampton,
Region 8-Chesapeake, Region 9-Charlottesville



Arrests

Criminal Charges

This table reflects the total and type of criminal charges that were placed by ABC enforcement personnel between April 1st through June 30th (second quarter 2022), and totals for the year.

ARREST CHARGES 2022												
CHARGE	REGION – Q2										YTD 2022	
	1	2	3	4	5	6	7	8	9	Compl.		Total
Alcohol Related Charges <i>*See Chart Below for Individual Charges</i>	16	5	16	10	0	0	14	5	2	0	68	69
Assault	0	0	0	0	0	0	0	0	0	0	0	0
Larceny	0	0	0	0	0	0	0	0	0	0	0	0
Shoplifting	0	0	0	0	0	0	0	0	1	0	1	2
Fraud / Forgery	0	0	0	0	0	0	0	0	0	0	0	0
Traffic Violations	0	0	0	0	0	0	0	0	0	0	0	0
Contribute to the Delinquency of Minor	0	0	0	0	0	0	0	0	0	0	0	0
Embezzlement	0	0	0	0	0	1	0	0	1	0	2	4
Firearms Violations	0	0	0	0	0	0	0	0	0	0	0	0
Tobacco Violations	0	0	6	12	9	0	4	0	1	0	32	32
Other	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	16	5	22	22	9	1	18	5	5	0	103	107

** The charges of larceny, shoplifting, embezzlement and fraud are primarily related to our retail stores.*

*4.1 ALCOHOL RELATED CHARGES	REGION – Q2										YTD 2022	
	1	2	3	4	5	6	7	8	9	Compl.		Total
Sale of Alcoholic Beverage -Underage	15	5	16	10	0	0	14	5	2	0	67	67
Unlicensed Distilling Apparatus	0	0	0	0	0	0	0	0	0	0	0	0
Illegal Sale of Alcohol	0	0	0	0	0	0	0	0	0	0	0	1
Possess Illegally acquired Alcohol	0	0	0	0	0	0	0	0	0	0	0	0
Illegal Manufacture of Alcohol	0	0	0	0	0	0	0	0	0	0	0	0
Aid and Abet Alcohol Law Violations	0	0	0	0	0	0	0	0	0	0	0	0
Maintain Common Nuisance	0	0	0	0	0	0	0	0	0	0	0	0
Drinking in Public	0	0	0	0	0	0	0	0	0	0	0	0
Use False ID to purchase	0	0	0	0	0	0	0	0	0	0	0	0
Underage purchase of Alcohol	1	0	0	0	0	0	0	0	0	0	1	1
TOTAL	16	5	16	10	0	0	14	5	2	0	68	69

Arrests by Region

This table breaks down the total criminal arrests by region where the offense took place, comparing the percentage change from arrests in the first quarter of 2022 to arrests in the second quarter of 2022 and total for the year.

Note: These are arrest figures involving the three types of reportable arrests; In-custody, Released on a Summons and Warrant. These numbers may differ from the number of charges placed by ABC Enforcement.

ARRESTS BY REGION				
REGION	1Q 2022 Arrests	2Q 2022 Arrests	% Change	YTD 2022
Region 1 - ROANOKE	0	16	N/A	16
Region 2 - LYNCHBURG	0	5	N/A	5
Region 3 - STAUNTON	1	22	2100%	23
Region 4 - ALEXANDRIA	0	22	N/A	22
Region 5 - FREDERICKSBURG	0	9	N/A	9
Region 6 - RICHMOND	1	1	0%	2
Region 7 - HAMPTON	0	18	N/A	18
Region 8 - CHESAPEAKE	0	5	N/A	5
Region 9 - CHARLOTTESVILLE	2	5	150%	7
Compliance	0	0	N/A	0
TOTAL	4	103	2475%	107

Arrest by Type and Race

This table reflects the race of arrested individuals in the second quarter of 2022. The data is broken down into the three types of arrests (On-View - Taken into Custody, Released on a Summons and Warrant - Taken Into Custody)

ARRESTS BY TYPE AND RACE 2Q - 2022				
Race	On-View	Summons	In-Custody	Total
White	1	52	1	54
Black	0	30	1	31
Hispanic	0	4	1	5
Asian	0	2	0	2
Middle Easter	0	7	0	7
Indian	0	1	0	1
Unknown	0	3	0	3
Total	1	99	3	103

Arrest by Age and Gender

This table reflects a breakdown by gender and age of all adults that have been arrested in the second quarter of 2022. This includes all types of arrests - (in-custody, released on summons and warrant).

ARREST BY GENDER AND AGE – 2Q - 2022													
Gender	Juvenile	18-20	21-24	25 -29	30-34	35 -39	40 -44	45 -49	50 -54	55 -59	60 -64	65 & Over	Total
Male	0	7	2	10	3	2	6	3	1	3	2	4	43
Female	0	6	5	7	5	4	8	9	4	5	4	3	60
TOTAL	0	13	7	17	8	6	14	12	5	8	6	7	103

Regulatory Violations

A large portion of the work performed by Virginia ABC Special Agents involves the enforcement of rules and regulations applicable to ABC licensees. Violations can be dealt with by issuing a written warning or by presenting a violation case to the ABC Hearings Division. These violations can be punishable by fines, suspension, or revocation of the ABC license.

Regulatory Charges Placed by Region

This table represents the total number of regulatory actions that were placed by enforcement personnel in the second quarter of 2022. Violations were routed to the hearings division for later adjudication while warnings were noted in the licensee file.

REGULATORY CHARGES PLACED - BY REGION*				
REGION	2Q		YTD 2022	
	# Hearing Violations	# Written Warnings	# Hearing Violations	# Written Warnings
Region 1 - ROANOKE	28	9	34	13
Region 2 - LYNCHBURG	46	17	49	27
Region 3 - STAUNTON	39	4	45	12
Region 4 - ALEXANDRIA	37	61	39	94
Region 5 - FREDERICKSBURG	35	1	42	7
Region 6 - RICHMOND	31	5	53	16
Region 7 - HAMPTON	43	10	45	31
Region 8 - CHESAPEAKE	13	4	25	12
Region 9 - CHARLOTTESVILLE	11	23	12	28
Compliance	17	49	19	53
License Records Management**	0	854	0	858
Total	300	1037	363	1151

*Count of individual charges

**License Records Management consists of system-generated warnings for late MBAR violations.

Regulatory Charges Adjudicated in Hearings

This table represents the total number and type of charges that were adjudicated by the ABC hearings division in this quarter as a result of the regulatory charges previously placed by ABC agents.

REGULATORY CHARGES ADJUDICATED IN HEARINGS DIVISION 2Q-2022												
CHARGES	REGIONS										TOTAL	
	1	2	3	4	5	6	7	8	9	Comp		
UAB	0	0	0	1	0	0	0	0	0	0	0	1
FAIL TO SUBMIT MBAR	0	0	0	0	0	1	0	0	0	0	0	1
MBAR VIOLATIONS	0	0	0	0	0	0	0	0	0	0	0	0
BAD CHECKS	0	0	0	0	0	0	0	0	1	0	0	1
FAILED TO COMPLY WITH REGULATIONS	0	0	0	0	0	0	1	0	0	1	0	2
UNAUTHORIZED ALCOHOL	0	0	0	0	0	0	1	0	0	0	0	1
PUBLIC SAFETY	0	0	0	0	0	0	1	0	0	0	0	1
EMPLOYEE WITH CRIMINAL BACKGROUND	0	0	0	0	0	0	0	0	0	0	0	0
CONSUMPTION BY LICENSEE/EMPLOYEE ON DUTY	0	0	0	0	0	0	0	0	0	0	0	0
ESTABLISHMENT SO LOCATED	0	0	0	0	0	0	0	0	0	0	0	0
CAUSE EXISTS	0	0	0	0	0	0	0	1	0	0	0	1
FAIL TO COMPLY WITH WHOLESALER REGULATIONS	0	0	0	0	0	0	0	0	0	0	0	0
FAILS TO QUALIFY/FINANCIAL RESPONSIBILITY	0	0	0	0	0	0	0	0	0	0	0	0
MANAGER NOT ON DUTY or NOT POSTED	0	0	0	0	0	0	0	0	0	0	0	0
SALE TO INTOXICATED	0	0	0	0	0	0	0	0	0	0	0	0
DELINQUENT	0	0	0	0	0	0	0	0	0	0	0	0
APPLICANT MISREPRESENTED/FALSE INFO	0	0	0	0	0	0	0	0	0	0	0	0
LOAN OR GIFT	0	0	0	0	0	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	2	0	0	1	0	3
Sub Totals	0	0	0	1	0	1	5	1	1	2	0	11

Field Contacts

A field contact is when an agent engages a citizen and conducts a brief interview. When an arrest does not occur as a result of a field interview, agents report the stop in a “Field Contact” report. This report documents the reason for the stop as well as identifying information about the individual. Scrutiny of these types of encounters enables law enforcement executives as well as citizens to monitor police/citizen interactions to guard against biased-based policing practices.

FIELD CONTACTS BY REGION WITH DEMOGRAPHICS - 2Q 2022											
REGION	White		Black		Hispanic		Asian		Middle Eastern		Total
	M	F	M	F	M	F	M	F	M	F	
Region 1 - ROANOKE	0	0	0	0	0	0	0	0	0	0	0
Region 2 - LYNCHBURG	0	0	0	0	0	0	0	0	0	0	0
Region 3 - STAUNTON	0	0	0	0	0	0	0	0	0	0	0
Region 4 - ALEXANDRIA	0	0	0	0	0	0	0	0	0	0	0
Region 5 - FREDERICKSBURG	0	0	0	0	0	0	0	0	0	0	0
Region 6 - RICHMOND	0	0	0	0	0	0	0	0	0	0	0
Region 7 - HAMPTON	0	0	0	0	0	0	0	0	0	0	0
Region 8 - CHESAPEAKE	0	0	0	0	0	0	0	0	0	0	0
Region 9 - CHARLOTTESVILLE	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0

Planned Operations Executed

An “Operational Plan” is submitted for all structured, pre-planned operations/observations for which enforcement action is anticipated, (i.e.: any undercover operation, most search warrant executions, and any enforcement operation involving five (5) or more sworn personnel).

This table is a summary of the planned operations that took place in second quarter of 2022. No planned operations conducted by ABC Enforcement in this quarter were in conjunction with other Law Enforcement Agencies.

OPERATIONAL PLANS APR - JUN 2022					
DATE	REGION	TYPE	TOTAL STAFFING	ASST. OTHER LE	AGENCY ASSISTED
No Planned Operations were completed this quarter.					

SAC – Special Agent in Charge
 ASAC – Assistant Special Agent in Charge
 SSA – Senior Special Agent
 SA – Special Agent

Use of Force Incidents

The Bureau considers any amount of effort required by an agent to compel compliance by an unwilling subject that exceeds normal restraint or handcuffing to be a “Use of Force” which requires a supervisor be notified and a Use of Force report completed.

USE OF FORCE INCIDENTS - REPORTED Q2 – 2022											
General Information			Agent Information					Offender Information			
Date	Type of Force	Level of Resistance	Region	Race	Sex	Age	Injury	Race	Sex	Age	Injury
NO USE OF FORCE INCIDENTS REPORTS FOR THIS QUARTER											

Internal Investigations

Any complaint alleging improper action or improper conduct by an employee, if job-related or in violation of the Standards of Conduct, other policies of the Bureau, Department of Human Resource Management, the ABC Policy and Procedures Manual, or criminal law, will generate an administrative internal investigation. There are two types of internal investigations that are conducted by the Bureau; Formal and Informal (the difference is explained below). Both types of investigations are documented and reported through the chain of command.

Formal Complaint(s)

Formal complaints involve allegations that are investigated by trained Internal Affairs investigators and, if substantiated, can lead to formal and significant disciplinary action.

Active Formal Complaints								
Date Received	FILE#	REGION	ALLEGATION(S)	Date Assigned	Date Due	Status	Date Completed	Disposition
3/28/2021	21-02	Alexandria	Fact Finding	3/29/2021	5/31/2021	Pending		No Disposition
9/13/2021	21-04	Lynchburg	Fact Finding	9/13/2021	10/28/2021	Closed	5/25/2022	Not Substantiated
10/20/2021	21-05	Staunton	Fact Finding	10/20/2021	12/4/2021	Closed	5/25/2022	Not Substantiated
11/29/2021	21-06	Alexandria	Fact Finding	12/3/2021	1/17/2022	Closed	5/25/2022	Not Substantiated
1/28/2022	22-01	Chesapeake	Fact Finding	1/28/2022	3/14/2022	Closed	5/25/2022	Unfounded
1/28/2022	22-02	Chesapeake	Improper Conduct	2/22/2022	4/8/2022	Closed	5/25/2022	Not Substantiated
2/22/2022	22-03	Hampton	Fact Finding	3/1/2022	4/15/2022	Pending		No Disposition
3/14/2022	22-04	Chesapeake / Hampton	Improper Conduct	3/23/2022	5/7/2022	Pending		No Disposition
6/29/2022	22-05	Lynchburg	Improper Conduct	7/1/2022	8/15/2022	Pending		No Disposition

Informal Complaint(s)

Informal complaints are minor allegations of infractions investigated by mid-level regional supervisors and the complainant is satisfied with the resolution offered and only wishes the matter to be handled informally by the supervisor.

INFORMAL COMPLAINT(S)						
Date Received	Date Assigned	FILE#	REGION	ALLEGATION(S)	Date Closed	Disposition
NO INFORMAL COMPLAINTS FOR THIS QUARTER						

License Activity Totals

A significant amount of an agent’s time is committed to the approval process of both retail and “one day” banquet licenses. This process involves background investigations, venue/establishment inspections and training.

Retail License Approvals

Retail Application approvals, sometimes tied to economic conditions, increased 28% for the second quarter of 2022 when compared to the previous quarter. In 2Q of 2021 there were 455 retail license approvals compared to 576 in 2Q of 2022 reflecting a 27% increase in approvals.

APPROVED RETAIL LICENSES											
3Q 2021			4Q 2021			1Q 2022			2Q 2022		
JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN
146	181	190	205	123	155	82	195	173	136	216	224
517			483			450			576		

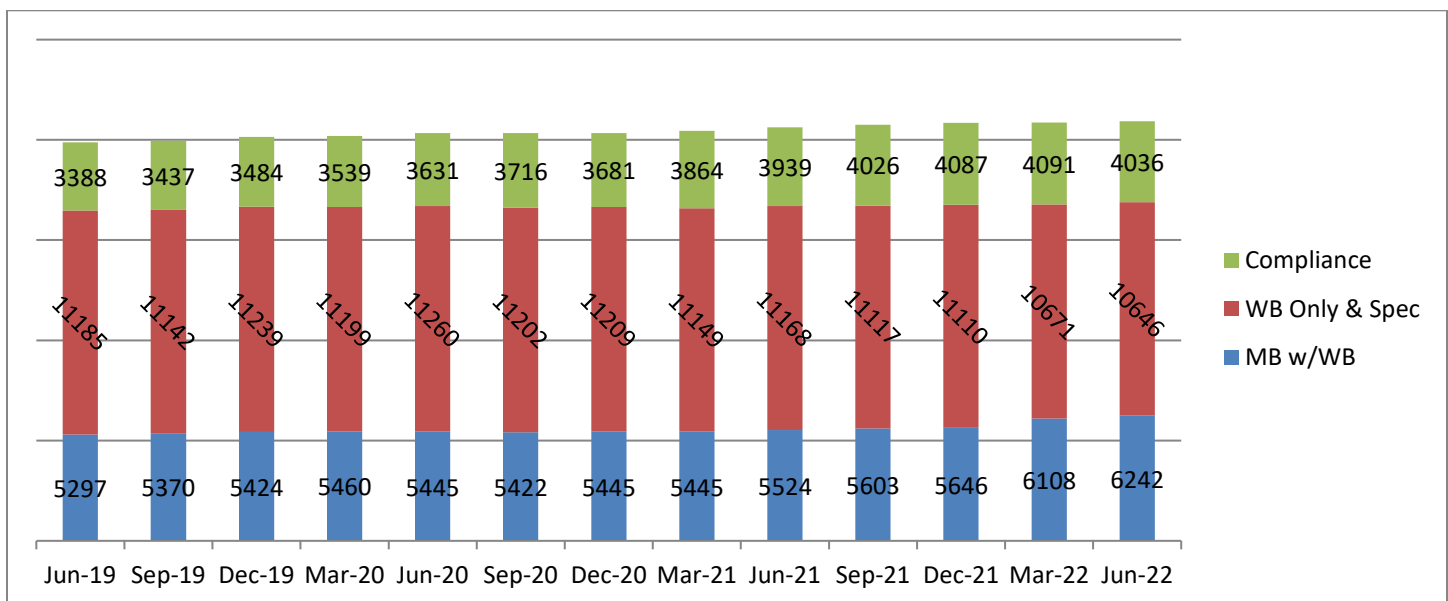
Banquet Licenses Approvals

Banquet License approvals, which follow seasonal trends, increased 54% in the second quarter when compared to the previous quarter. In 2Q of 2021 there were 2508 banquet license approvals compared to 5966 in 2Q of 2022 reflecting a 91% increase in activity compared to the second quarter of last year.

APPROVED BANQUET LICENSES											
3Q 2021			4Q 2021			1Q 2022			2Q 2022		
JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN
1174	1383	1476	1126	707	593	715	1201	1947	1852	2180	1934
4033			2426			3863			5966		

Total Retail Licenses

Total Retail Licenses in the state has shown steady incremental growth.



Inspections / Observations

Licensee Inspections Completed

All ABC licensed establishments are subject to inspection by ABC agents. These inspections are overt; the agent will inspect the premises for compliance with regulatory requirements, meet with the owner or manager to review business receipts and purchasing records, review previously submitted MBARs and answer any questions business employees may have about ABC laws and requirements.

2022 LICENSE INSPECTIONS - BY REGION AND QUARTER							
REGION	2021	2021	2022	2022	TOTALS	TOTAL LICENSES**	% LICENSES INSPECTED
	3Q	4Q	1Q	2Q			
1 - Roanoke	476	385	196	185	1242	2059	60%
2 - Lynchburg	339	276	143	139	897	1229	73%
3 - Staunton	287	155	221	351	1014	1232	25%
4 - Alexandria	806	557	517	581	2461	4034	61%
5 - Fredericksburg	299	213	106	72	690	1097	63%
6 - Richmond	581	810	269	198	1858	2500	74%
7 - Hampton	418	281	232	413	1344	1489	90%
8 - Chesapeake	303	578	257	385	1523	2266	67%
9 - Charlottesville	237	328	105	125	795	982	81%
Compliance	144	331	25	51	551	2119	26%
TOTALS	3890	3914	2071	2500	12375	19007	65%

**Records system only allows for a snapshot of the total license count. Total licenses do not include 1917 out-of-state licenses. License totals include Wine & Beer Off Premise Licensees which are only inspected every two years, thus the percentage of licensees inspected is not expected to be 100% for a one-year cycle.

Observations Completed

Agents also conduct unannounced, covert, plain-clothes observations of ABC establishments to ensure licensees are following all ABC laws and regulations. Many of these observations are follow-up investigations initiated by citizen complaints.

2021 - 2022 OBSERVATIONS COMPLETED					
REGION	2021 3Q	2021 4Q	2022 1Q	2022 2Q	TOTALS
1 - Roanoke	0	6	0	11	17
2 - Lynchburg	0	5	0	13	18
3 - Staunton	10	10	4	12	36
4 - Alexandria	0	4	1	2	7
5 - Fredericksburg	12	9	11	9	41
6 - Richmond	66	1	6	11	84
7 - Hampton	0	0	6	1	7
8 - Chesapeake	16	1	5	4	26
9 - Charlottesville	4	4	2	3	13
Compliance	4	0	1	0	5
TOTALS	112	40	36	66	254

Underage Buyer Totals

The Underage Buyer (UAB) program is an ongoing effort by Virginia ABC to visit alcohol and tobacco retailers throughout the Commonwealth to verify compliance with the state age requirements which are 21 for tobacco and 21 for alcohol sales. Special Agents accompany underage operatives during attempts to purchase cigarettes or alcohol at grocery stores, convenience stores, restaurants, and other businesses, including Virginia ABC stores.

Underage Buyer Program Checks – Alcohol

UAB ALCOHOL CHECKS COMPLETED - CY 2022						
REGION	2Q Totals			2022 Totals		
	# Checks Made	# Sales Made	Compliance Rate	# Checks Made	# Sales Made	Compliance Rate
Region 1 - ROANOKE	99	18	82%	99	18	82%
Region 2 - LYNCHBURG	66	4	94%	66	4	94%
Region 3 - STAUNTON	104	19	82%	104	19	82%
Region 4 - ALEXANDRIA	94	13	86%	94	13	86%
Region 5 - FREDERICKSBURG	0	0	N/A	0	0	N/A
Region 6 - RICHMOND	0	0	N/A	0	0	N/A
Region 7 - HAMPTON	62	14	77%	62	14	77%
Region 8 - CHESAPEAKE	7	4	43%	7	4	43%
Region 9 - CHARLOTTESVILLE	67	2	97%	67	2	97%
Compliance	1	0	100%	1	0	100%
Total	500	74	85%	500	74	85%

Underage Buyer Program Checks – Tobacco

UAB TOBACCO CHECKS COMPLETED - 2Q - 2022			
REGION	# Checks Made	# Sales Made	Compliance Rate
Region 1 - ROANOKE	0	0	N/A
Region 2 - LYNCHBURG	0	0	N/A
Region 3 - STAUNTON	22	4	82%
Region 4 - ALEXANDRIA	79	17	78%
Region 5 - FREDERICKSBURG	37	9	76%
Region 6 - RICHMOND	0	0	N/A
Region 7 - HAMPTON	14	4	71%
Region 8 - CHESAPEAKE	16	4	75%
Region 9 - CHARLOTTESVILLE	5	4	20%
Compliance	0	0	N/A
Total	173	42	76%

Training

Virginia ABC Enforcement is committed to continuously improving the knowledge base and understanding of our Agents, our fellow law enforcement agencies, our licensees and the community. To this end, this quarter agents presented over 514 hours of training to law enforcement, licensees, and the general public. There were over 631 hours of training received by ABC agents. These agents also attended over 968 hours of community outreach meetings.

TRAINING AND COMMUNITY INVOLVEMENT - 2Q 2022 (Hours)									
	Meetings			Training Instructed			Training Received		
REGION	ABC Store	Licensee	Public/ Community	Law Enforcement	Licensee	Public	In-House	Outside	Totals
REG1 - Roanoke	59.07	72.08	31.03	68.57	17.12	0.00	29.08	8.97	285.92
REG2 - Lynchburg	40.78	142.12	32.97	87.55	5.00	8.50	92.65	6.23	415.80
REG3 - Staunton	10.18	33.70	5.93	1.98	7.12	3.72	29.92	0.00	92.55
REG4 - Alexandria	15.72	38.93	2.48	0.00	44.80	4.48	38.73	4.50	149.64
REG5 - Fredericksburg	14.48	42.58	7.17	3.50	0.00	0.00	3.07	0.00	70.80
REG6 - Richmond	50.73	56.12	19.45	79.92	4.95	3.00	46.57	0.00	260.74
REG7 - Hampton	43.00	30.67	8.58	46.88	1.00	0.00	29.00	1.00	160.13
REG8 - Chesapeake	25.00	58.02	5.35	0.00	28.28	3.00	30.37	0.00	150.02
REG9 - Charlottesville	0.98	61.83	5.22	23.75	0.00	0.00	12.00	0.00	103.78
Compliance Office	1.25	39.42	13.52	74.13	0.68	0.00	29.82	0.00	158.82
Training Office	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals	261.19	575.47	131.70	386.28	108.95	22.70	341.21	20.70	1848.20
			968.36			517.93		361.91	

Accreditation

Virginia ABC Enforcement is a State Accredited Law Enforcement Agency. Re-accreditation for VA ABC was accomplished on January 9th, 2021. A 2nd reaccreditation Term began on November 1, 2019 and will end on January 31st, 2023. There are a total of 190 standards that have to be met with numerous proofs required for each standard. All 190 standards have completed proofs.

ACCREDITATION ACTIVITIES			
Mandated Activities	Required	In progress	Completed
Quarterly			
Regional Change Funds	11	0	11
Asset Forfeiture Funds	11	0	11
Evidence Room Inspection	19	0	19
Employee Benefit Fund	1	0	1
Semi-Annual/Term			
Vehicle/Equipment	157	0	157
Unannounced Evidence Inspections	19	0	19
Annual Evidence Audits	10	0	10
Yearly			
Standards	190	20	170
Proofs	606	206	406