VIRGINIA ALCOHOLIC BEVERAGE CONTROL BUREAU OF LAW ENFORCEMENT



QUARTERLY REPORT

4th Quarter - 2018 October 1st through December 31st

CONTENT

Subject	Page
-	_
Executive Summary	2
Arrests	3
Regulatory Violations	6
Field Contacts	7
Planned Operations Executed	8
Use of Force Incidents	8
Internal Investigations	9
License Activity	10
Inspections	11
Observations	12
Underage Buyer Programs	13
Training	14
Accreditation	15

Executive Summary

As a commitment to transparency, accountability and reporting, the Virginia Alcoholic Beverage Control Authority's Bureau of Law Enforcement produces this quarterly report in accordance with Virginia Code 4.1-103 #30 and as part of its implementation of the recommendations of the Governor's Expert Panel. The report demonstrates our progress toward the panel's recommendations as well as ensuring citizen access to information.

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 165 total charges placed this quarter with 155 (94%) of those charges related to alcohol violations. Last quarter there were 158 charges with 87 (55%) being alcohol related. There is a 4% increase in total arrests compared to last quarter. Racial breakdown of arrests shows % of arrestees were 62% white and 23% black. Distribution of arrests by gender for the quarter shows 39% of arrestees being male and 61% female.
- 2. **Regulatory violations** This quarter saw a 27% increase in violations brought to hearings and a 8% decrease in written warnings when compared to 3Q 2018. There was a 34% increase in regulatory charges adjudicated in hearings with 192 in 4Q 2018 and 143 in 3Q 2018.
- 3. **Field Contacts** There was 1 field contact this quarter.
- 4. **Planned Operations** There were 4 planned operations this quarter and 12 in the third quarter of 2018.
- 5. Use of Force Reports There were no reported Use of Force incidents in this quarter
- 6. **Internal Investigations** There are currently 2 Open Internal Investigations that are pending. There were no Informal Complaints assigned to the field.
- 7. **License Activity** Retail Approvals showed a decrease of 13% for the fourth quarter of 2018 compared to the previous quarter. Retail license approvals are up roughly 3% when compared to the fourth quarter of 2017. Banquet license approvals showed a 3% decrease when compared to the previous quarter and an 11% increase when compared to fourth quarter of 2017.
- 8. **Inspections/Observations** Inspections showed an increase of 43% when comparing fourth quarter of 2018 to third quarter of 2018, and a 17% increase when compared to fourth quarter of 2017. Observations are down 44% when comparing fourth quarter 2018 to the previous quarter.
- 9. **Underage Buyer** UAB alcohol checks showed an increase of 106 % this quarter when compared to the previous quarter. The compliance rate was 89%. "Synar" tobacco checks were not done this quarter but one agent initiated tobacco check was completed with no sale made.
- 10. **Training and Community Outreach** ABC presented over 692 hours of training to law enforcement, licensees and the general public this quarter. There were 1078 hours of training received by ABC agents. These agents also attended over 760 hours of community outreach meetings.
- 11. **Accreditation** The bureau remains committed to maintaining accreditation with numerous audits being conducted this quarter.

Most of the above data will be broken down by region. Below is a map of Virginia outlined by region:

Region 1-Roanoke, Region 2-Lynchburg, Region 3-Staunton, Region 4-Alexandria, Region 5-Fredericksburg, 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 October 1 and December 31, 2018 (4th Quarter 2018) and totals for the year. A majority of the arrests (155) involve sales made to underage individuals. These arrests usually occur as a result of the ABC underage buyer compliance program.

		ARRE	ST CH	IARG	ES 20	18	•	•	•			•
CHARGE				R	EGIO	N – Q	4					YTD
CHARGE	1	2	3	4	5	6	7	8	9	СОМР	Total	2018
Alcohol Related Charges	22	14	10	4	7	21	21	24	30	2	155	406
† See Chart Below for Individual Charges	22	14	10	4	,	21	21	24	30	۷	133	400
Burglary											0	0
Larceny *							2				2	34
Shoplifting *	3										3	7
Embezzlement *				1				1			2	8
Fraud / Forgery *						1					1	30
Public Intoxication											0	7
Possession of a Fictitious Driver's License											0	1
Narcotics Violation											0	0
Trespass											0	3
Weapons Law Violations		1									1	1
Tobacco Law Violations											0	51
Traffic Law Violations											0	1
Indecent Exposure											0	3
Arrest on Warrant											0	1
Employ security personnel w/o registratio	n						1				1	1
TOTAL	25	15	10	5	7	22	24	25	30	2	165	554

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

+ 4.1 ALCOHOL RELATED				•	RE	GION	– Q4		•			YTD
CHARGES	1	2	3	4	5	6	7	8	9	СОМР	Total	2018
Sale of Alcoholic Beverage -Underage	22	13	9	4	6	20	19	24	30	2	149	354
Unlicensed Distilling Apparatus					1						1	2
Illegal Sale of Alcohol											0	7
Possess Illegally acquired Alcohol											0	8
Restaurant: Possess without a license			1								1	1
Aid and Abet Alcohol Law Violations											0	3
Falsify Application for License		1									1	1
Drinking in Public											0	1
Use False ID to purchase						1					1	9
Underage purchase of Alcohol							2				2	20
TOTAL	22	14	10	4	7	21	21	24	30	2	155	406

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 3rd quarter of 2018 to arrests in the 4th quarter of 2018 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	3Q 2018	4Q 2018	%	YTD 2018						
REGION	Arrests	Arrests	Change	110 2018						
Region 1 - ROANOKE	29	25	-14%	96						
Region 2 - LYNCHBURG	2	15	650%	36						
Region 3 - STAUNTON	5	10	100%	31						
Region 4 - ALEXANDRIA	37	5	-86%	74						
Region 5 - FREDERICKSBURG	8	7	-13%	24						
Region 6 - RICHMOND	26	22	-15%	112						
Region 7 - HAMPTON	19	24	26%	58						
Region 8 - CHESAPEAKE	9	25	178%	53						
Region 9 - CHARLOTTESVILLE	23	30	30%	68						
Compliance	0	2	N/A	2						
TOTAL	158	165	4%	554						

Arrest by Type and Race

This table reflects the race of arrested individuals in the third quarter of 2018. The data is broken down into the three types of arrests (On-view - taken into custody, released on summons and warrant - taken into custody)

	ARRESTS	BY TYPE an	d RACE						
	4	IQ - 2018							
RACE	On-View	Summons	In-custody	Total					
White	4	95	3	102					
Black 5 30 3 38									
Hispanic		10		10					
Asian		9		9					
Middle Eastern		4		4					
Indian		1		1					
Unknown		1		1					
Total	165								

Arrest by Age and Gender

This table reflects a breakdown by gender and age of all adults that have been arrested in the third quarter of 2018. This includes all types of arrests - (in-custody, released on summons and warrant).

	ARREST BY GENDER AND AGE – 4Q - 2018												
Gender	Juvenile	18-20	21-24	25 -	30 -	35 -	40 -	45 -	50 -	55 -	60 -	65 &	Total
Gender	Juvernie	16-20	21-24	29	34	39	44	49	54	59	64	Over	TOtal
Male	1	4	11	13	9	5	2	4	5	4	3	3	64
Female	3	11	17	18	8	11	6	4	5	7	7	4	101
TOTAL	4	15	28	31	17	16	8	8	10	11	10	7	165

Regulatory Violations

A large portion of the work performed by Virginia ABC special agents involves 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 4th Quarter of 2018. Violations were routed to the hearings division for later adjudication while warnings were noted in the licensee file.

REGULATORY CH	ARGES PLAC	ED - BY REG	ion*		
	4	Q	YTD 2018		
REGION	# Hearing	#Written	# Hearing	#Written	
	Violations	Warnings	Violations	Warnings	
Region 1 - ROANOKE	24	13	86	99	
Region 2 - LYNCHBURG	15	12	36	52	
Region 3 - STAUNTON	13	7	40	27	
Region 4 - ALEXANDRIA	10	111	88	420	
Region 5 - FREDERICKSBURG	10	21	28	100	
Region 6 - RICHMOND	28	43	72	133	
Region 7 - HAMPTON	21	22	52	115	
Region 8 - CHESAPEAKE	32	31	83	119	
Region 9 - CHARLOTTESVILLE	34	14	72	65	
Compliance	3	22	33	67	
License Records Management**	0	240	0	1129	
Total	190	536	590	2326	

^{*}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 AI	DJU	DICAT	ED II	N HEA	ARIN	GS [OIVIS	ION 4	4Q-2	018	
						RE	GIONS				
CHARGES	1	2	3	4	5	6	7	8	9	COMPL.	TOTAL
UAB	32	4		22	8	3	4	3	6		82
APPLICANT NOT APPROVED FOR LICENSE				15				3			18
FAIL TO SUBMIT MBAR	2			13	1	1					17
MBAR VIOLATIONS	5			2		2	1	3	1		14
BAD CHECKS	4			2		2		2			10
FAILED TO COMPLY WITH REGULATIONS	7				1		1			1	10
ESTABLISHMENT SO LOCATED	3	1		3	1	1	1				10
FAIL TO COMPLY WITH WHOLESALER REGULATIONS	4	1		3							8
CAUSE EXISTS	3							3			6
PUBLIC SAFETY	3					1		1			5
EMPLOYEE WITH CRIMINAL BACKGROUND				1				1	1		3
OTHER	3			2			2			2	9
Sub Totals	66	6	0	63	11	10	9	16	8	3	192

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.

1	FIELD CONTACTS BY REGION WITH DEMOGRAPHICS - 4Q 2018													
REGION	Wł	White		Black		Hispanic		Asian		Middle Eastern				
	М	F	М	F	М	F	М	F	М	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	1	0	0	0	0	0	0	0	0	0	1			
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	1	0	0	0	0	0	0	0	0	0	1			

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 the 4th Quarter of 2018. Of the four planned operations conducted by ABC Enforcement in this quarter, three were conducted in conjunction with other Law Enforcement Agencies.

		OPERATIONAL PLANS	OCT - DEC	2018	
			TOTAL	ASST.	AGENCY
DATE	REGION	TYPE	STAFFING	OTHER LE	ASSISTED
12-Oct	Region 5- Fredericksburg	Compliance/Public Safety Event Operation (Colonial Beach Bike Fest)	5 SA/1 SAC	Y	VSP, Colonial Beach PD, Westmoreland County SO
13-Oct	Region 5 - Fredericksburg	Compliance/Public Safety Event Operation (Colonial Beach Bike Fest)	5 SA/1 SAC	Y	VSP, Colonial Beach PD, Westmoreland County SO
19-Oct	Region 6 - Richmond	Enforcement Operation (Clay Express Mart)	6 SA/1 ASAC	N	N/A
25-Oct	Region 6 - Richmond	Undercover/Buy Walk Operation	9 SA/1 ASAC	N	N/A

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 4Q – 2018											
•	General Information Agent Information Offender Information											
Date	Type of Level of											
	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 report through the chain of command.

Formal Complaint(s)

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

			ACTIVE FORM	AL COMP	LAINT(S)		·	
Date Received	FILE#	REGION	ALLEGATION(S)	Date Assigned	Date Due	Status	Date Completed	Disposition
9/25/2017	17-05	Region 6 - Richmond	Improper Conduct	9/25/2017	10/25/2017	Closed	10/18/2017	Not Substantiated
2/8/2018	18-01	Region 4 - Alexandria	Improper Conduct	2/9/2018	3/18/2018	Closed	11/20/2018	Substantiated
6/26/2018	18-04	HQ	Improper Conduct	6/26/2018	8/26/2018	Closed	11/20/2018	Substantiated
7/13/2018	18-05	Region 9 - Charlottesville	Improper Conduct	7/13/2018	9/13/2018	Closed	12/20/2018	Substantiated
11/1/2018	18-06	Region 5 - Fredericksburg	Improper Conduct	11/1/2018	12/15/2018	Open		
11/4/2018	18-07	Region 6 - Richmond	Improper Conduct	11/14/2018	12/31/2018	Open		

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, decreased 13% for the 4th quarter of 2018 when compared to the previous quarter. In 4Q of 2017 there were 451 retail license approvals compared to 463 in 4Q of 2018 reflecting a 3% increase in approvals.

	APPROVED RETAIL LICENCES										
	1Q - 2018 2Q - 2018			3Q - 2018			4Q - 2018				
JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
244	176	169	195	210	167	168	197	167	171	144	148
		589			572			532			463

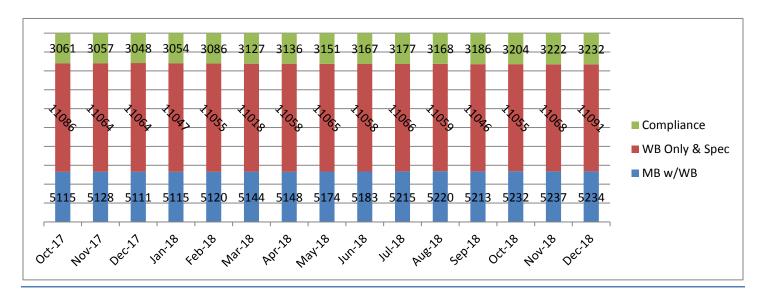
Banquet Licenses Approvals

Banquet License approvals, which follow seasonal trends, decreased in the 4th quarter with a 3% decrease when compared to the previous quarter. In 4Q of 2017 there were 7213 banquet license approvals compared to 7998 in 4Q of 2018 reflecting an 11% increase in activity compared to 4th quarter of last year.

	APPROVED BANQUET LICENSES											
	1Q - 201	- 2018 2Q - 2018			3Q - 2018			4Q - 2018				
JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ОСТ	NOV	DEC	
755	1106	1649	2171	2845	3476	2246	2450	3580	3701	2215	2082	
		3510			8492			8276			7998	

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.

2018 LICENSE INSPECTIONS - BY REGION AND QUARTER									
REGION	2018	2018	2018	2018	TOTALS	TOTAL LICENSES**	% LICENSES INSPECTED		
	1Q	2Q	3Q	4Q					
1 - Roanoke	250	198	593	389	1430	1937	74%		
2 - Lynchburg	150	129	246	281	806	1181	68%		
3 - Staunton	151	72	355	233	811	1188	68%		
4 - Alexandria	739	114	866	753	2472	3856	64%		
5 - Fredericksburg	345	61	195	173	774	1069	72%		
6 - Richmond	283	88	191	816	1378	2409	57%		
7 - Hampton	234	156	236	514	1140	1464	78%		
8 - Chesapeake	308	77	191	663	1239	2229	56%		
9 - Charlottesville	246	73	123	354	796	962	83%		
Compliance	255	97	264	475	1091	1670	65%		
TOTALS	2961	1065	3260	4651	11937	17965	66%		

^{**}Records system only allows for a snapshot of total license count. Compliance total licenses do not include 1624 out of state licensees. License totals include Wine & Beer Off Premise Licensees which only get 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.

2017 - 2018 OBSERVATIONS COMPLETED									
REGION	2018 2018 2		2018	2018	TOTALS				
	1Q	2Q	3Q	4Q					
1 - Roanoke	15	157	67	2	241				
2 - Lynchburg	63	117	55	17	252				
3 - Staunton	1	5	0	0	6				
4 - Alexandria	18	22	17	7	64				
5 - Fredericksburg	4	41	19	26	90				
6 - Richmond	20	18	16	41	95				
7 - Hampton	18	10	6	6	40				
8 - Chesapeake	15	17	25	13	70				
9 - Charlottesville	10	8	5	3	26				
Compliance	0	1	2	3	6				
TOTALS	164	396	212	118	890				

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—18 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 2018										
		4Q Totals	s	2018 Totals						
REGION	# Checks Made	# Sales Made	Compliance Rate	# Checks Made	# Sales Made	Compliance Rate				
Region 1 - ROANOKE	170	22	87%	470	51	90%				
Region 2 - LYNCHBURG	173	11	94%	335	24	93%				
Region 3 - STAUNTON	135	11	92%	297	34	89%				
Region 4 - ALEXANDRIA	80	5	94%	532	62	88%				
Region 5 - FREDERICKSBURG	81	3	96%	300	18	94%				
Region 6 - RICHMOND	211	21	90%	467	39	92%				
Region 7 - HAMPTON	202	20	90%	358	33	91%				
Region 8 - CHESAPEAKE	188	26	86%	392	46	88%				
Region 9 - CHARLOTTESVILLE	123	28	77%	276	54	80%				
Compliance	32	2	100%	58	2	100%				
Total	1395	149	89%	3485	363	90%				

Underage Buyer Program Checks - Tobacco

UAB TOBACCO CHECKS COMPLETED - 4Q - 2018										
REGION	# Checks Made	# Sales Made	Compliance Rate							
Region 1 - ROANOKE	0	0	0%							
Region 2 - LYNCHBURG	0	0	0%							
Region 3 - STAUNTON	0	0	0%							
Region 4 - ALEXANDRIA	0	0	0%							
Region 5 - FREDERICKSBURG	0	0	0%							
Region 6 - RICHMOND	1	0	100%							
Region 7 - HAMPTON	0	0	0%							
Region 8 - CHESAPEAKE	0	0	0%							
Region 9 - CHARLOTTESVILLE	0	0	0%							
Compliance	0	0	0%							
Total	1	0	100%							

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 690 hours of training to law enforcement, licensees and the general public. There were 1078 hours of training received by ABC agents. These agents also attended over 755 hours of community outreach meetings.

1	TRAINING AND COMMUNITY INVOLVEMENT - 4Q 2018 (Hours)									
		Meetings		Trair	ing Instructe	d	Training			
REGION	ABC Store	Licensee	Public/ Community	Law Enforcement	Licensee	Public	In-House	Outside	Totals	
REG1 - Roanoke	54.7	78.02	51.03	47.35	30.65	0	75.20	6.48	343.43	
REG2 - Lynchburg	38.82	71.88	37.98	142.37	30.47	3.97	121.53	84	531.4	
REG3 - Staunton	0	0.98	1.33	42.97	19.90	0	30.12	0	95.3	
REG4 - Alexandria	16.42	62.57	22.6	0	94.75	5	109.42	52	362.98	
REG5 - Fredericksburg	3.35	31.55	7.75	15.17	26.17	4.17	54.90	27	170.06	
REG6 - Richmond	8.35	24.75	15.2	16.35	23.62	10.98	77.97	48.40	225.62	
REG7 - Hampton	17.18	26.77	19.27	11.75	13.95	2.23	62.82	57	211.22	
REG8 - Chesapeake	4.23	11.15	14.47	0	12.62	10.32	78.67	0	131.46	
REG9 - Charlottesville	29.15	37.92	7.5	0	11.97	0	38.27	16.98	141.79	
Compliance Office	0	51.63	12.23	35.47	2.48	1.48	52.83	21	177.12	
Training Office	0	0	0	64.97	0	11.4	2.97	60	139.74	
Totals	172.2	397.22	189.36	376.4	266.58	49.55	704.70	374.09	2530.1	
		758.78 692.53 1078.79								

Accreditation

Virginia ABC Enforcement is a State Accredited Law Enforcement Agency. Re-Accreditation for VA ABC began with term 1 on October 1, 2015 and will end with term 4 on September 30, 2019. There are a total of 191 standards that have to be met with numerous proofs required for each standard. Of the 191 standards all have some level of completed proofs.

ACCREDITATION ACTIVITIES										
Mandated Activities	Required	In progress	Completed							
Quart	erly									
Regional Change Funds	11	1	10							
Asset Forfeiture Funds	10	0	10							
FDA Funds	2	0	2							
Evidence Room Inspection	10	0	10							
Employee Benefit Fund	1	1								
Semi-Annu	ual/Term									
Vehicle/Equipment	143	143	0							
Unannounced Evidence Inspections	20	10	10							
Annual Evidence Audits	10	2	8							
Yearly										
Standards	190	80	110							
Proofs	606	200	406							