VIRGINIA ALCOHOLIC BEVERAGE CONTROL BUREAU OF LAW ENFORCEMENT



QUARTERLY REPORT

3rd Quarter - 2022 July 1st through September 30th

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Executive Summary

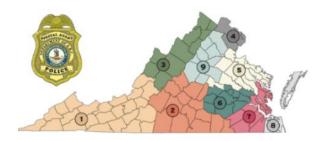
The Governor's Expert Panel gave clear directions on the content of this quarterly report. This report follows those basic guidelines. Listed below is a synopsis of the data reported in each of those areas:

- 1. **Criminal Violations** There were 288 charges placed this quarter with 204 (71%) charges related to alcohol violations. Last quarter there were 103 charges placed with 68 (66%) charges being alcohol related. Arrests are up 180% compared to last quarter.
- 2. **Regulatory violations** This quarter saw a 88% decrease in violations brought to hearings and a 19% decrease in written warnings when compared to 2Q 2022. There was a 277% increase in regulatory charges adjudicated in hearings with 11 in 2Q 2022 and 36 in 3Q 2022.
- 3. Field Contacts There were no field contacts made this quarter.
- 4. Planned Operations There were no planned operations this quarter.
- 5. Use of Force Reports There were no reported Use of Force incidents this quarter.
- 6. **Internal Investigations** There are currently six open Internal Investigations. There were no informal complaints assigned to the field.
- 7. License Activity Retail approvals are down 3% for the third quarter of 2022 compared to the previous quarter. Retail license approvals are up 8% when compared to the third quarter of 2021. Banquet license approvals show a 7% increase when compared to the previous quarter and a 58% increase when compared to the third quarter of 2021.
- 8. **Inspections/Observations** Inspections showed an increase of 8% when comparing third quarter of 2022 to second quarter of 2022, and a 31% decrease when compared to the third quarter of 2021. Observations are down 12% when comparing third quarter 2022 to the previous quarter.
- 9. Underage Buyer -There were 1425 Alcohol checks made and 563 Tobacco checks. The compliance rate for Alcohol checks for the quarter is 86% and the compliance rate for Tobacco checks is 85%. Last quarter the compliance rate for Alcohol checks was 85% and for Tobacco checks was 76%.
- 10. **Training and Community Outreach** ABC presented over 716 hours of training to law enforcement, licensees, and the general public this quarter. There were 430 hours of training received by ABC agents. These agents also attended over 795 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



Criminal Charges

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

	A	RRES	БТ СН	ARGE	S 202	22	•	•	•		•	
6114 D 0 5	REGION – Q3											YTD
CHARGE	1	2	3	4	5	6	7	8	9	Compl.	Total	2022
Alcohol Related Charges *See Chart Below for Individual Charges	17	24	20	24	23	23	24	43	6	0	204	273
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	0	0	0	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	0	0	0	0	0	0	4
Firearms Violations	0	0	0	0	0	0	0	0	0	0	0	0
Tobacco Violations	8	17	4	12	3	21	9	9	1	0	84	116
Other	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	25	41	24	36	26	44	33	52	7	0	288	395

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

*4.1 ALCOHOL RELATED				REG	ION -	- Q3		-				YTD
CHARGES	1	2	3	4	5	6	7	8	9	Compl.	Total	2022
Sale of Alcoholic Beverage - Underage	17	24	20	24	23	19	24	43	6	0	200	267
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	3	0	0	0	0	3	3
Underage purchase of Alcohol	0	0	0	0	0	1	0	0	0	0	1	2
TOTAL	17	24	20	24	23	23	24	43	6	0	204	273

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 third 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.

ARRE	STS BY R	EGION	-	
REGION	2Q 2022	3Q 2022	%	
REGION	Arrests	Arrests	Change	YTD 2022
Region 1 - ROANOKE	16	25	56%	41
Region 2 - LYNCHBURG	5	41	720%	46
Region 3 - STAUNTON	22	24	9%	47
Region 4 - ALEXANDRIA	22	36	64%	58
Region 5 - FREDERICKSBURG	9	26	189%	35
Region 6 - RICHMOND	1	44	4300%	46
Region 7 - HAMPTON	18	33	83%	51
Region 8 - CHESAPEAKE	5	52	940%	57
Region 9 - CHARLOTTESVILLE	5	7	40%	14
Compliance	0	0	N/A	0
TOTAL	103	288	180%	395

Arrest by Type and Race

This table reflects the race of arrested individuals in the third 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)

		3Y TYPE AN 3Q - 2022	D RACE									
Race	On-View	Summons	In-Custody	Total								
White	White 0 143 1 144											
Black 0 96 0 96												
Hispanic	0	14	0	14								
Asian	0	9	0	9								
Middle Easter	0	12	0	12								
Indian	0	0	0	0								
Unknown	nknown 0 13 0 13											
Total	0	287	1	288								

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 2022. This includes all types of arrests - (in-custody, released on summons and warrant).

	· · ·			AR	REST BY	GENDER	AND AGE	- 3Q - 20	022				
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	2	4	20	10	9	12	5	12	14	3	6	10	107
Female	6	12	10	30	24	20	17	12	15	17	11	7	181
TOTAL	8	16	30	40	33	32	22	24	29	20	17	17	288

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 third quarter of 2022. Violations were routed to the hearings division for later adjudication while warnings were noted in the licensee file.

REGULATORY CH	ARGES PLAC	CED - BY REG	GION*						
	3	Q	YTD 2022						
REGION	# Hearing Violations	# Written Warnings		# Written Warnings					
Region 1 - ROANOKE	3	8	37	21					
Region 2 - LYNCHBURG	8	20	57	47					
Region 3 - STAUNTON	4	10	49	22					
Region 4 - ALEXANDRIA	5	57	44	151					
Region 5 - FREDERICKSBURG	6	3	48	10					
Region 6 - RICHMOND	7	15	60	31					
Region 7 - HAMPTON	3	13	48	44					
Region 8 - CHESAPEAKE	0	4	25	16					
Region 9 - CHARLOTTESVILLE	1	2	13	30					
Compliance	0	12	19	65					
License Records Management**	0	691	0	1549					
Total 37 835 400 198									

*Count of individual charges

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

Regulatory Charges Adjudicated in Hearings

REGULATORY CHAP	RGES AD	JUDICA	TED IN H	HEARING	SS DIVIS	SION 3Q	-2022				
						REGION	IS				
CHARGES	1	2	3	4	5	6	7	8	9	Comp	TOTAL
UAB	0	1	0	5	1	0	1	0	0	0	8
FAIL TO SUBMIT MBAR	1	0	0	1	0	0	0	0	0	0	2
MBAR VIOLATIONS	1	1	0	0	0	0	0	0	0	0	2
BAD CHECKS	0	0	1	1	0	0	0	0	0	0	2
FAILED TO COMPLY WITH REGULATIONS	0	0	0	1	0	0	0	0	0	0	1
UNAUTHORIZED ALCOHOL	1	0	0	1	0	0	0	0	0	0	2
PUBLIC SAFETY	0	0	0	0	0	0	0	0	0	0	0
EMPLOYEE WITH CRIMINAL BACKGROUND	0	0	0	0	0	0	0	0	0	0	0
CONSUMPTION BY LICENSEE/EMPLOYEE ON DUTY	0	0	0	0	1	0	0	0	0	0	1
ESTABLISHMENT SO LOCATED	0	0	0	0	0	1	0	0	2	4	7
CAUSE EXISTS	0	0	0	0	0	1	0	0	0	0	1
FAIL TO COMPLY WITH WHOLESALER REGULATIONS	0	0	0	0	0	0	0	0	1	5	6
FAILS TO QUALIFY/FINANCIAL RESPONSIBILITY	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
SALE TO INTOXICATED	0	0	0	0	0	0	0	0	0	0	0
DELINQUENT	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
LOAN OR GIFT	0	0	0	0	0	0	0	0	0	0	0
OTHER	3	1	0	0	0	0	0	0	0	0	4
Sub Totals	6	3	1	9	2	2	1	0	3	9	36

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.

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 CO	FIELD CONTACTS BY REGION WITH DEMOGRAPHICS - 3Q 2022											
REGION	White		Bla	ack	Hispanic		Asian		Middle Eastern		Total	
	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	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	

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 third quarter of 2022. No planned operations conducted by ABC Enforcement in this quarter were in conjunction with other Law Enforcement Agencies.

	OPERATIONAL PLANS JUL - SEP 2022											
DATE	DATE REGION TYPE TOTAL STAFFING ASST. AGENCY OTHER LE ASSISTED											
NO PLANNED OPERATIONS EXECUTED 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.

		l	JSE OF I	ORCE IN	CIDENT	S - REPO	RTED 3C	Q - 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 For	mal Comp	olaints			
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
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
7/15/2022	22-06	Lynchburg	Improper Conduct	7/19/2022	9/2/2022	Pending		No Disposition
7/14/2022	22-07	Lynchburg	Improper Conduct	7/19/2022	9/2/2022	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, decreased 3% for the third quarter of 2022 when compared to the previous quarter. In 3Q of 2021 there were 517 retail license approvals compared to 559 in 3Q of 2022 reflecting a 8% increase in approvals.

APPROVED RETAIL LICENSES											
4Q 2021			1Q 2022			2Q 2022			3Q 2022		
ОСТ	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	JUN
205	123	155	82	195	173	136	216	224	171	200	188
483			450					576			559

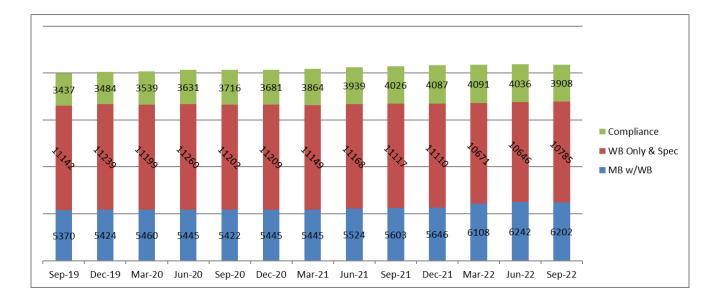
Banquet Licenses Approvals

Banquet License approvals, which follow seasonal trends, increased 7% in the third quarter when compared to the previous quarter. In 3Q of 2021 there were 4033 banquet license approvals compared to 6361 in 3Q of 2022 reflecting a 58% increase in activity compared to the second quarter of last year.

APPROVED BANQUET LICENSES											
4Q 2021			1Q 2022				2Q 2022			3Q 2022	
OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	APR	MAY	JUN
1126	707	593	715	1201	1947	1852	2180	1934	1713	2274	2374
2426			3863					5966			6361

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	2022	22 2022		TOTALS	TOTAL LICENSES**	% LICENSES INSPECTED			
	4Q	1Q	2Q	3Q						
1 - Roanoke	385	196	185	527	1293	2058	63%			
2 - Lynchburg	276	143	139	481	1039	1223	84%			
3 - Staunton	155	221	351	271	998	1242	24%			
4 - Alexandria	557	517	581	471	2126	4081	52%			
5 - Fredericksburg	213	106	72	104	495	1106	45%			
6 - Richmond	810	269	198	235	1512	2533	60%			
7 - Hampton	281	232	413	171	1097	1494	73%			
8 - Chesapeake	578	257	385	239	1459	2265	64%			
9 - Charlottesville	328	105	125	166	724	985	74%			
Compliance	331	25	51	37	444	2010	22%			
TOTALS	3914	2071	2500	2702	11187	18997	59%			

**Records system only allows for a snapshot of the total license count. Total licenses do not include 1898 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	2022	2022	2022	TOTALS					
	4Q	1Q	2Q	3Q						
1 - Roanoke	6	0	11	1	18					
2 - Lynchburg	5	0	13	12	30					
3 - Staunton	10	4	12	2	28					
4 - Alexandria	4	1	2	4	11					
5 - Fredericksburg	9	11	9	5	34					
6 - Richmond	1	6	11	20	38					
7 - Hampton	0	6	1	5	12					
8 - Chesapeake	1	5	4	3	13					
9 - Charlottesville	4	2	3	5	14					
Compliance	0	1	0	1	2					
TOTALS	40	36	66	58	200					

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										
		3Q Totals	5	2022 Totals						
REGION	#	#	Compliance	#	#					
NEGION .	Checks	Sales	Rate	Checks	Sales	Compliance				
	Made	Made	nate	Made	Made	Rate				
Region 1 - ROANOKE	113	13	88%	212	31	85%				
Region 2 - LYNCHBURG	193	26	87%	259	30	88%				
Region 3 - STAUNTON	129	20	84%	233	39	83%				
Region 4 - ALEXANDRIA	227	24	89%	321	37	88%				
Region 5 - FREDERICKSBURG	141	26	N/A	141	26	82%				
Region 6 - RICHMOND	168	24	N/A	168	24	86%				
Region 7 - HAMPTON	198	34	83%	260	48	82%				
Region 8 - CHESAPEAKE	161	25	84%	168	29	83%				
Region 9 - CHARLOTTESVILLE	83	6	93%	150	8	95%				
Compliance	12	3	75%	13	3	77%				
Total	1425	201	86%	1925	275	86%				

Underage Buyer Program Checks – Tobacco

UAB TOBACCO CHECKS COMPLETED - 3Q - 2022										
	#	#	Compliance							
REGION	Checks Made	Sales Made	Rate							
Region 1 - ROANOKE	108	14	87%							
Region 2 - LYNCHBURG	103	15	85%							
Region 3 - STAUNTON	40	5	88%							
Region 4 - ALEXANDRIA	46	13	72%							
Region 5 - FREDERICKSBURG	7	3	57%							
Region 6 - RICHMOND	122	18	85%							
Region 7 - HAMPTON	46	9	80%							
Region 8 - CHESAPEAKE	65	9	86%							
Region 9 - CHARLOTTESVILLE	26	1	96%							
Compliance	0	0	N/A							
Total	563	87	85%							

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 716 hours of training to law enforcement, licensees, and the general public. There were over 430 hours of training received by ABC agents. These agents also attended over 795 hours of community outreach meetings.

TRAINING AND COMMUNITY INVOLVEMENT - 3Q 2022 (Hours)										
		Meetings		Trai	ning Instructe	ed	Training F	Received		
REGION	ABC Store	Licensee	Public/ Community	Law Enforcement	Licensee	Public	In-House	Outside	Totals	
REG1 - Roanoke	18.73	43.72	35.58	62.50	4.73	0.00	12.10	0.00	177.36	
REG2 - Lynchburg	15.47	63.02	40.18	203.63	0.00	0.00	32.08	39.48	393.86	
REG3 - Staunton	3.40	29.53	10.18	0.00	13.23	7.63	45.03	0.00	109.00	
REG4 - Alexandria	20.85	49.38	4.73	4.13	44.82	0.98	65.20	0.00	190.09	
REG5 - Fredericksburg	3.08	33.12	20.22	0.50	0.00	0.00	7.92	0.00	64.84	
REG6 - Richmond	15.12	71.13	46.73	166.50	0.00	1.00	68.83	26.48	395.79	
REG7 - Hampton	15.08	80.82	10.25	41.50	1.00	2.00	20.05	21.00	191.70	
REG8 - Chesapeake	18.32	34.92	5.85	0.00	24.38	0.98	23.63	0.00	108.08	
REG9 - Charlottesville	1.97	52.27	5.95	88.50	6.00	0.00	31.67	0.00	186.36	
Compliance Office	0.00	44.45	1.47	0.00	3.98	0.00	36.93	0.00	86.83	
Training Office	0.00	0.00	0.00	38.50	0.00	0.00	0.00	0.00	38.50	
Totals	112.02	502.36	181.14	605.76	98.14	12.59	343.44	86.96	1942.41	
			795.52			716.49		430.40		

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-Anı	nual/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	26	580							