

VIRGINIA ALCOHOLIC BEVERAGE CONTROL
BUREAU OF LAW ENFORCEMENT



QUARTERLY REPORT

3rd Quarter - 2018
July 1st through September 30th

CONTENT

<u>Subject</u>	<u>Page</u>
Executive Summary	2
Arrests	3
Regulatory Violations	6
Field Contacts	7
Planned Operations Executed	8
Use of Force Incidents	9
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 Department of Alcoholic Beverage Control, Bureau of Law Enforcement is implementing the recommendations of the Governor's Expert Panel by producing this quarterly report which demonstrates our progress towards the panel's recommendations as well as ensuring citizen access to information.

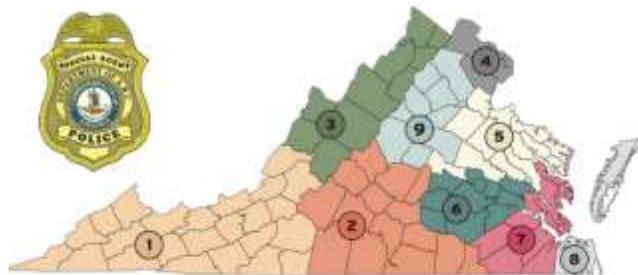
The Governor's Expert Panel gave clear directions on the content of this quarterly report. This report follows those basic guidelines. Listed below is a synopsis of the data reported in each of those areas:

1. **Criminal Violations** – There were 158 total charges placed this quarter with 87 (55%) of those charges related to alcohol violations. Last quarter there were 120 charges with 97 (81%) being alcohol related. There is a 36% increase in total arrests compared to last quarter. Racial breakdown of arrests shows % of arrestees were 55% white and 22% black. Distribution of arrests by gender for the quarter shows 44% of arrestees being male and 56% female.
2. **Regulatory violations** – This quarter saw a 23% increase in Hearing Violations and a 5% decrease in Written Warning when compared to 2Q 2018. There was a 127% increase in Regulatory Charges Adjudicated in hearings with 143 in 3Q 2018 and 63 in 2Q 2018.
3. **Field Contacts** – There was 1 field contact this quarter.
4. **Planned Operations** – There were 12 planned operations this quarter and 9 in the second 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 4 Open Internal Investigations that are pending. There was one Informal Complaint assigned to the field.
7. **License Activity** – Retail Approvals showed a decrease of 7% for the third quarter of 2018 compared to the previous quarter. Retail license approvals are up roughly 5% when compared to the third quarter of 2017. Banquet license approvals showed a 3% decrease when compared to the previous quarter and a 1% increase when compared to third quarter of 2017.
8. **Inspections/Observations** – Inspections showed an increase of 206% when comparing third quarter of 2018 to second quarter of 2018, and a 12% increase when compared to third quarter of 2017. Observations are down 47% when comparing third quarter 2018 to the previous quarter.
9. **Underage Buyer** – UAB alcohol checks showed a decrease of 33% this quarter when compared to the previous quarter. The compliance rate was 89%. 517 "Synar" tobacco checks were done this quarter with a compliance rate of 89% rate.
10. **Training and Community Outreach** – ABC presented over 690 hours of training to law enforcement, licensees and the general public this quarter. There were 511 hours of training received by ABC agents. These agents also attended over 864 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-Stauanton, 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 July 1 and September 30, 2018 (3rd Quarter 2018) and totals for the year. A majority of the arrests (63) involve sales made to underage individuals. These arrests usually occur as a result of the ABC underage buyer compliance program.

ARREST CHARGES 2018													
CHARGE	REGION – Q3											YTD 2018	
	1	2	3	4	5	6	7	8	9	SO	Total		
Alcohol Related Charges Chart Below for Individual Charges	*See											87	248
Burglary												0	0
Larceny	3					2	9					14	32
Shoplifting					1		1		1			3	4
Embezzlement						2						2	6
Fraud / Forgery												0	27
Public Intoxication	3											3	7
Possession of a Fictitious Driver's License												0	2
Narcotics Violation												0	0
Trespass												0	3
Weapons Law Violations												0	0
Tobacco Law Violations	10		2	11	2	1	6	5	8			45	51
Traffic Law Violations						1						1	1
Indecent Exposure						3						3	3
Arrest on Warrant												0	1
TOTAL	29	2	5	37	8	26	19	9	23	0		158	385

*4.1 ALCOHOL RELATED CHARGES	REGION – Q3											YTD 2018	
	1	2	3	4	5	6	7	8	9	SO	Total		
Sale of Alcoholic Beverage -Underage	5	2	3	25	4	5	2	4	13	0		63	207
Unlicensed Distilling Apparatus												0	1
Illegal Sale of Alcohol						2	1					3	3
Possess Illegally acquired Alcohol	3											3	7
Restaurant: Possess without a license												0	0
Aid and Abet Alcohol Law Violations						2						2	3
Maintain Common Nuisance												0	0
Drinking in Public									1			1	1
Use False ID to purchase				1	1	3						5	8
Underage purchase of Alcohol	5					5						10	18
TOTAL	13	2	3	26	5	17	3	4	14	0		87	248

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 2nd quarter of 2018 to arrests in the 3rd 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	2Q 2018 Arrests	3Q 2018 Arrests	% Change	YTD 2018
Region 1 - ROANOKE	31	29	-6%	70
Region 2 - LYNCHBURG	13	2	-85%	21
Region 3 - STAUNTON	8	5	-38%	21
Region 4 - ALEXANDRIA	14	37	164%	69
Region 5 - FREDERICKSBURG	7	8	14%	16
Region 6 - RICHMOND	19	26	37%	90
Region 7 - HAMPTON	13	19	46%	34
Region 8 - CHESAPEAKE	5	9	58%	26
Region 9 - CHARLOTTESVILLE	10	23	130%	38
Compliance	0	0	0%	0
Special Operations	0	0	0%	0
TOTAL	120	158	31%	385

Arrest by Type and Race

This table reflects the race of arrested individuals in the second 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 and RACE				
3Q - 2018				
RACE	On-View	Summons	In-custody	Total
White	4	78	9	91
Black	0	27	9	36
Hispanic	0	11	0	11
Asian	1	10	1	12
Middle Eastern	0	4	0	4
Indian	0	2	0	2
Unknown	0	2	0	2
Total	5	134	19	158

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 – 3Q - 2018													
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	3	8	10	14	15	7	3	2	0	4	1	3	70
Female	0	13	16	19	6	6	4	5	4	8	6	1	88
TOTAL	3	21	26	33	21	13	7	7	4	12	7	4	158

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. These alcoholic beverage control regulations are found in the Code of Virginia, Section 4.1

Regulatory Charges Placed by Region

This table represents the total number of regulatory actions that were placed by enforcement personnel in the 3rd Quarter of 2018. Violations were routed to the hearings division for later adjudication while warnings were noted in the licensee file.

REGULATORY CHARGES PLACED - BY REGION*				
REGION	3Q		YTD 2018	
	# Hearing Violations	# Written Warnings	# Hearing Violations	# Written Warnings
Region 1 - ROANOKE	22	34	55	80
Region 2 - LYNCHBURG	4	12	21	40
Region 3 - STAUNTON	8	4	26	19
Region 4 - ALEXANDRIA	38	121	76	307
Region 5 - FREDERICKSBURG	11	20	18	78
Region 6 - RICHMOND	23	17	47	82
Region 7 - HAMPTON	10	27	32	87
Region 8 - CHESAPEAKE	12	18	46	80
Region 9 - CHARLOTTESVILLE	18	10	37	50
Compliance	4	11	23	36
License Records Management**	0	306	0	889
Special Operations	0	0	0	0
Total	150	580	381	1748

*Count of individual charges

**License Records Management consists of system-generated warnings for 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					
	3Q-2018				
REGION	UAB	FAIL TO SUBMIT MBAR	MBAR Violations	Other Violations	TOTAL
Region 1 - ROANOKE	8	0	1	0	9
Region 2 - LYNCHBURG	7	0	0	3	10
Region 3 - STAUNTON	7	0	0	1	8
Region 4 - ALEXANDRIA	24	9	2	10	45
Region 5 - FREDERICKSBURG	3	0	0	1	4
Region 6 - RICHMOND	10	2	0	9	21
Region 7 - HAMPTON	10	0	1	5	16
Region 8 - CHESAPEAKE	8	0	0	4	12
Region 9 - CHARLOTTESVILLE	9	0	0	9	18
Sub Totals	86	11	4	42	143

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 - 3Q 2018											
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	1	0	0	0	0	0	0	0	0	0	1
Total	1	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 3rd Quarter of 2018. Of the 12 planned operations conducted by ABC Enforcement in this quarter, three were conducted in conjunction with other Law Enforcement Agencies.

OPERATIONAL PLANS JUL - SEP 2018					
DATE	REGION	TYPE	TOTAL STAFFING	ASST. OTHER LE	AGENCY ASSISTED
18-Jul	Region 6 - Richmond	Undercover Operation: Alcohol Buy/Walk	7 SA	N	N/A
20-Jul	Region 6 - Richmond	Compliance/Public Safety Operation	2 SA	Y	Henrico County Police
25-Jul	Region 1 - Roanoke	Floyd Fest - Compliance and Regulatory – Licensed Special Event # 515289	2 SA	N	Patrick County Sheriff's Office
26-Jul	Region 1 - Roanoke	Floyd Fest - Compliance and Regulatory – Licensed Special Event # 515289	2 SA	N	Patrick County Sheriff's Office
26-Jul	Region 8 - Chesapeake	Under Cover Alcohol Purchase	7 SA / 1 ASAC	N	N/A
27-Jul	Region 1 - Roanoke	Floyd Fest - Compliance and Regulatory – Licensed Special Event # 515289	2 SA	Y	Patrick County Sheriff's Office
28-Jul	Region 1 - Roanoke	Floyd Fest - Compliance and Regulatory – Licensed Special Event # 515289	2 SA	Y	Patrick County Sheriff's Office
6-Aug	Region 8 - Chesapeake	Undercover Ticket Purchase	8 SA / 1 ASAC	N	N/A
17-Aug	Region 6 - Richmond	Enforcement Operation - Clay Express Mart	6 SA	N	N/A
31-Aug	Region 6 - Richmond	Undercover/Search Warrant Operation	6 SA	N	N/A
28-Sep	Region 1 - Roanoke	Blue Ridge Bike Fest	3 SA / 1 ASAC	N	N/A
29-Sep	Region 1 - Roanoke	Blue Ridge Bike Fest	3 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 3Q – 2018											
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 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 FORMAL COMPLAINT(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	Open		
2/8/2018	18-01	Region 4 - Alexandria	Improper Conduct	2/9/2018	3/18/2018	Open		
6/26/2018	18-04	HQ	Improper Conduct	6/26/2018	8/26/2018	Open	7/15/2018	Substantiated
7/13/2018	18-05	Region 9 - Charlottesville	Improper Conduct	7/13/2018	9/13/2018	Open		Substantiated

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
6/13/2018	6/13/2018	18-101	Region 4 - Alexandria	Improper Conduct	7/16/2018	Unfounded

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 Licenses Approvals

Retail Application approvals, sometimes tied to economic conditions, decreased 7% for the third quarter of 2018 when compared to the previous quarter. In 3Q of 2017 there were 508 retail license approvals compared to 532 in 3Q of 2018 reflecting a 5% increase in approvals.

APPROVED RETAIL LICENCES											
4Q - 2017			1Q - 2018			2Q - 2018			3Q - 2018		
OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
168	143	140	244	176	169	195	210	167	168	197	167
451			589			572			532		

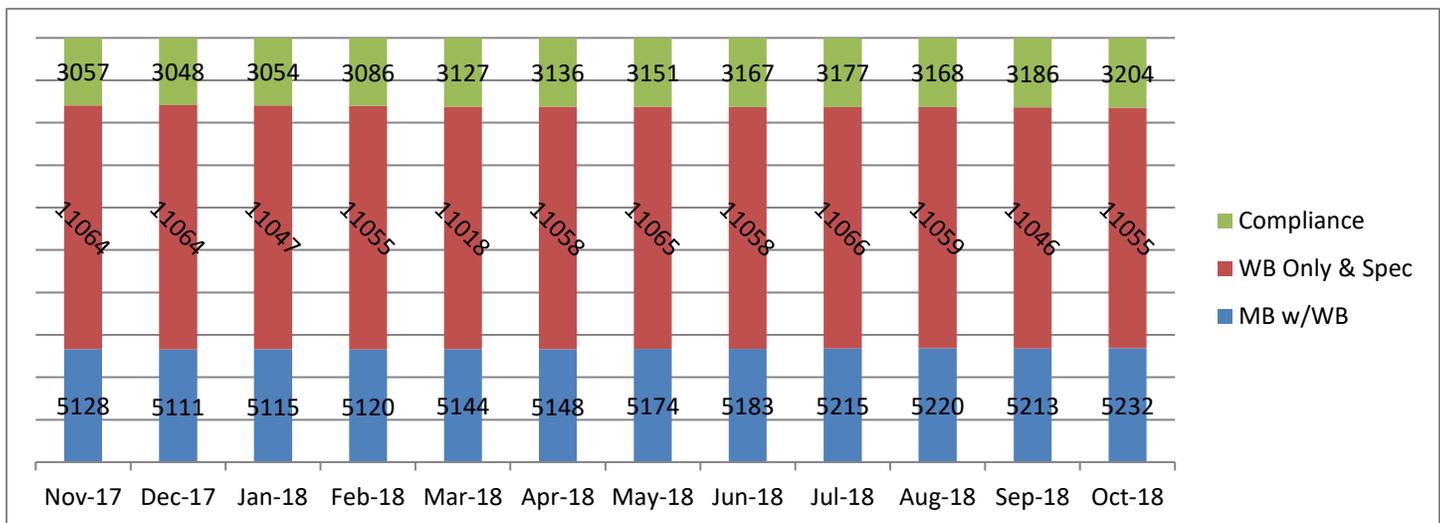
Banquet Licenses Approvals

Banquet License approvals, which follow seasonal trends, decreased in the 3rd quarter with a 2.5% decrease when compared to the previous quarter. In 3Q of 2017 there were 8166 Banquet license approvals compared to 8276 in 3Q of 2018 reflecting a 1% increase in activity compared to 3rd quarter of last year.

APPROVED BANQUET LICENCES											
4Q - 2017			1Q - 2018			2Q - 2018			3Q - 2018		
OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
3395	1907	1911	755	1106	1649	2171	2845	3476	2246	2450	3580
7213			3510			8492			8276		

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.

2017 - 2018 LICENSE INSPECTIONS - BY REGION AND QUARTER							
REGION	2017	2018	2018	2018	TOTALS	TOTAL LICENSES**	% LICENSES INSPECTED
	4Q	1Q	2Q	3Q			
1 - Roanoke	321	250	198	593	1362	1939	70%
2 - Lynchburg	198	150	129	246	723	1185	61%
3 - Staunton	94	151	72	355	672	1177	57%
4 - Alexandria	553	739	114	866	2272	3860	59%
5 - Fredericksburg	255	345	61	195	856	1056	81%
6 - Richmond	880	283	88	191	1442	2403	60%
7 - Hampton	341	234	156	236	967	1453	67%
8 - Chesapeake	637	308	77	191	1213	2218	55%
9 - Charlottesville	240	246	73	123	682	957	71%
Compliance	467	255	97	264	1083	1653	66%
TOTALS	3986	2961	1065	3260	11272	17901	63%

**Records system only allows for a snapshot of total license count. Compliance total licenses does not include 1530 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	2017 4Q	2018 1Q	2018 2Q	2018 3Q	TOTALS
1 - Roanoke	41	15	157	67	280
2 - Lynchburg	26	63	117	55	261
3 - Staunton	0	1	5	0	6
4 - Alexandria	25	18	22	17	82
5 - Fredericksburg	11	4	41	19	75
6 - Richmond	20	20	18	16	74
7 - Hampton	8	18	10	6	42
8 - Chesapeake	32	15	17	25	89
9 - Charlottesville	8	10	8	5	31
Compliance	1	0	1	2	4
Special Ops	0	0	0	0	0
TOTALS	172	164	396	212	944

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						
REGION	3Q Totals			2018 Totals		
	# Checks Made	# Sales Made	Compliance Rate	# Checks Made	# Sales Made	Compliance Rate
Region 1 - ROANOKE	74	5	95%	387	41	89%
Region 2 - LYNCHBURG	10	2	80%	215	15	93%
Region 3 - STAUNTON	69	7	90%	196	25	87%
Region 4 - ALEXANDRIA	204	27	87%	537	70	87%
Region 5 - FREDERICKSBURG	136	9	93%	257	16	94%
Region 6 - RICHMOND	38	3	92%	269	18	93%
Region 7 - HAMPTON	23	2	91%	196	19	90%
Region 8 - CHESAPEAKE	45	6	87%	258	24	91%
Region 9 - CHARLOTTESVILLE	71	15	79%	170	33	81%
Compliance/Special Ops	6	0	100%	26	0	100%
Total	676	76	89%	2511	261	90%

Underage Buyer Program Checks – Tobacco

UAB TOBACCO CHECKS COMPLETED - 3Q - 2018			
REGION	# Checks Made	# Sales Made	Compliance Rate
Region 1 - ROANOKE	80	11	86%
Region 2 - LYNCHBURG	29	0	100%
Region 3 - STAUNTON	35	2	94%
Region 4 - ALEXANDRIA	79	11	86%
Region 5 - FREDERICKSBURG	30	1	97%
Region 6 - RICHMOND	45	1	98%
Region 7 - HAMPTON	40	6	85%
Region 8 - CHESAPEAKE	54	4	93%
Region 9 - CHARLOTTESVILLE	17	7	59%
Compliance	0	0	N/A
Special Operations	0	0	N/A
Total	409	43	89%

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 511 hours of training received by ABC agents. These agents also attended over 864 hours of community outreach meetings.

TRAINING AND COMMUNITY INVOLVEMENT - 3Q 2018 (Hours)									
REGION	Meetings			Training Instructed			Training Received		Totals
	ABC Store	Licensee	Public/Community	Law Enforcement	Licensee	Public	In-House	Outside	
REG1 - Roanoke	29.43	77.45	47.45	108.12	38.75	0.98	32.03	38.43	372.64
REG2 - Lynchburg	36.18	78	77.50	136.50	58.57	9.98	26.98	0	423.71
REG3 - Staunton	4.72	9.32	4.65	7.25	6.48	2.73	0.98	0	36.13
REG4 - Alexandria	9.98	62.57	18.92	0	77.83	2.98	189.48	0	361.76
REG5 - Fredericksburg	0.75	13.00	6.25	15.08	8.92	7.58	29.40	0	80.98
REG6 - Richmond	0.50	33.02	43.33	3.43	31.25	7.00	42.85	27.00	188.38
REG7 - Hampton	15.28	27.33	12.97	57.00	12.40	0	10.62	0	135.6
REG8 - Chesapeake	5.92	32.85	21.05	0	7.50	11.48	60.12	0	138.92
REG9 - Charlottesville	42.42	32.48	25.63	0	0.00	0	29.95	8.00	138.48
Compliance Office	0.48	66.98	27.67	18.18	7.70	5.98	14.70	0	141.69
Special Operations	0	0	0	0	0	0	0	0	0
Training Office	0	0	0	41.32	0	5.47	1.00	0	47.79
Totals	145.66	433.00	285.42	386.88	249.40	54.18	438.11	73.43	2066.08
			864.08			690.46		511.54	

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
Quarterly			
Regional Change Funds	11	11	0
Asset Forfeiture Funds	10	8	2
FDA Funds	9	9	0
Evidence Room Inspection	10	0	10
Employee Benefit Fund	1	0	1
Semi-Annual/Term			
Vehicle/Equipment	143	0	143
Unannounced Evidence Inspections	20	0	20
Annual Evidence Audits	10	0	10
Yearly			
Standards	191	0	191
Proofs	606	0	606