

- 1 Who We Are
- $\mathbf{2}$ **Our Performance**
- 3 The Budget
- 4 Looking Ahead

# **Office of the Attorney General Citizen-Centric Report**

## Fiscal Year 2019

#### Mission

To represent the Government of Guam, prosecute on behalf of the People of Guam, and uphold the rule of law.

#### **Core Values**

Professionalism Respect Integrity Dedication Excellence



Attorney General Leevin T. Camacho

Who We Are

The Office of the Attorney General has eight divisions and various units that collectively work together to meet our mission. We help Guam families, protect the public, and serve the government by providing legal counsel. Internally, we strive to ensure each division and unit is given the tools necessary to achieve excellence and work efficiently.



Protecting the Public



Serving the Government

#### **Child Support Enforcement**

parents with obtaining Assists Assists parents with obtaining financial support for raising their children

#### Victim Service Center

Guides victims of crimes and their families through the criminal justice process, including informing victims of their rights and important case updates

#### Prosecution

Solicitors

Reviews government contracts

for compliance with Guam

government agencies and

issues legal opinions

law; provides legal advice to

Prosecutes all adult criminal cases

**Civil Litigation** 

Represents GovGuam in

civil lawsuits and claims

made against the

government

Handles criminal allegations against minors; represents GovGuam in cases involving youth and incapacitated adults

Family

#### Administration

Responsible for the business processes of the agency and provides support to all divisions

#### **Consumer Protection**

Enforces local laws against false, misleading and deceptive practices; promotes consumer education and awareness

#### **General Counsel**

Develops and implements internal policies and procedures; serves as liaison to the Legislature

#### **Employee Demographics Total OAG Personnel: 198 FUN FACT:** Personnel Gender Age 40% 34 64% - Support Staff **63%** law schools are 27% - Attorneys represented among 9% - Investigators 10% 50% attorneys in the OAG Support Staff: 126 51+ years: 79 31-50 years: 99 Male: 74 (as of 09/30/20) Attorneys: 54 Female: 124 Investigators: 18 18-30 years: 20 671-475-3324 590 S. Marine Corps Dr. Ste. 901 Tamuning. GU 96913 ag@oagguam.org @oagguam

- 1 Who We Are
- 2 Our Performance
- 3 The Budget
- 4 Looking Ahead

#### **Performance Highlight**

Restitution court orders defendants to compensate victims for financial losses suffered as a result of a crime. This year, there was an increase of 100 cases opened and a total of \$76,714.30 was collected.

Each division serves our island in many ways. Here is a summary of our work output over the last four years and the trend changes in each category.

#### **Performance Highlight**

Child support dedicated resources to reduce the decades-old \$5M undistributed child support payments. Focusing on locating parents and reissuing checks, over \$146,000 in 158 cases were returned in the first five months, with checks dating as far back as 2008.

CHILD SUPPORT ENFORCEMENT DIVISION     io.     io.     io.     io.     io.     io.     io.     io.       Total Child Support Collected     \$10,881,598     \$10,310,282     io.     io		Division	FY2016	FY2017	∆ % FY16-17	FY 2018	∆% FY17-18	FY2019	∆% FY18-19
Total Child Support Collected       \$10,81,598       \$10,310,282 $-5.25\%$ \$9,923,175 $-3.75\%$ \$9,382,651 $-5.45\%$ Active Caseboal $-6,654$ $-6,662$ $0.12\%$ $-6,512$ $-2.25\%$ $-6,584$ $1.11\%$ Undistributed Collections Redispersed* $0$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $-*$ $0$ $0$ $-*$ $0$ $-*$ $0$ $0$ $-*$ $0$ <t< td=""><td colspan="2"></td><td>112010</td><td>112011</td><td>1110-11</td><td>112010</td><td>1111-10</td><td>112013</td><td>1110-13</td></t<>			112010	112011	1110-11	112010	1111-10	112013	1110-13
Undistributed Collections Redispersed*       0       0       *       0       *       0       *       8146,767.40       *         CONSUMER DIVISION       Ince       Ince<		Total Child Support Collected	\$10,881,598	\$10,310,282	-5.25%	<b>\$9,923,175</b>	-3.75%	<b>\$9,382,651</b>	-5.45%
$ \begin{array}{c c c c c c c c c c c c c c c c c c c $		Active Caseload	6,654	6,662	0.12%	6,512	-2.25%	6,584	1.11%
New Complaints365178-51.23%24939.89%219.12.05Closed Complaints1290650.00%56-37.78%36-35.71Go't Collections Cases Filed*000764778Juvenile Delinquency/ Juvenile Drug Court427286-33.02%196-31.47%2023.066Restorative Justice6110877.05%13020.37%15720.77PROSECUTION DIVISION64784745-4.97%7713.49%616-5.13Misdemeanor Cases Filed919752-18.17%643-14.49%616-5.13Misdemeanor Cases Filed919752-18.17%643-14.49%616-5.13Dul/DWI330253-12.98%39.4433.56%29.44-25.38Dul/DWI310253-18.37%2717.11%44965.68Dul/DWI310253-18.98%2717.11%4.92-6.69VCTIM SERVE00-32.22%35.61%\$7.71%\$3.62%\$60.2.45-5.51%Contract Review1,6221,471-9.31%1,307-11.15%1,285-1.68%SOLICTIONED0-32.22%\$50.57%\$172.976%\$61.72\$6.25%\$60.20%\$67.71%Contract Review590508-13.90%\$172.976%\$172.976%\$6.25%\$60.20%\$6.75.71Ligal Guidance & Opnion Requests </td <td colspan="2"></td> <td>0</td> <td>0</td> <td>*</td> <td>0</td> <td>*</td> <td>\$146,767.40</td> <td>*</td>			0	0	*	0	*	\$146,767.40	*
$ \begin{array}{c c c c c c c c c c c c c c c c c c c $	CONSUMER DIVISION								
Gov't Collections Cases Filed*00101474FAMILY DIVISIONICICICICICICICJuvenile Delinquency/ Juvenile Drug Court427286-33.02%196-51.47%20.23.069Restorative Justice6110877.05%13020.3771203.069PROSECUTION DIVISIONICICICICICICICProsecution Cases Filed919752-18.17%643-14.49%610-5.13Misdemeanor Cases Filed919752-18.17%643-14.49%610-5.13Misdemeanor Cases Filed339295-12.98%39433.56%2944-25.38Charged70023923912.98%39433.56%2944-25.38DU//DVI310253-18.39%2717.11%4449616.08DU//DVI310253-18.99%2717.11%444965.68OUTO SERVICE CENTERICICICICICContract Review590,571.278162,808.6579.76%8172,976.086.25%\$60,202.4565.52SOLICT OF DIVISIONICICICICICICContract Review590508-13.90%4454-10.63%42.92-55.14Legal Guidance & Opnion Requests390508-13.90%13.0025.54%-25.54%Ingel Contract R		New Complaints	365	178	-51.23%	249	39.89%	219	-12.05%
FAMILY DIVISION         Intermited point purchase         Intermited point purchase <thintermited point="" purchase<="" th="">         Intermited p</thintermited>		Closed Complaints	12	90	650.00%	56	-37.78%	36	-35.71%
Juvenile Delinquency/ Juvenile Drug Court Restorative Justice       427       286 $-33.02\%$ 196 $-31.47\%$ 202       3.066         PROSECUTION DIVISION       61       108       77.05%       130       20.37%       157       20.77         PROSECUTION DIVISION       61       0.66       74.57 $-4.97\%$ 771 $3.49\%$ 716 $-7.13$ Highest Charged       Family Volence       457       619       35.45%       377 $-39.10\%$ 3666 $-2.92\%$ Highest Charged       Family Volence       457       619       35.45%       377 $-39.10\%$ 3666 $-2.92\%$ Highest Charged       Thet DU//DWI       310       233       295 $-12.98\%$ 394       33.56%       294 $-25.38$ DU//DWI       310       233       162 $-32.22\%$ 272       67.90%       227 $-16.54$ VICTIM SERVICE CENTER       100       239       162 $-32.22\%$ $272.8$ $65.92$ $860,202.45$ $-65.22$ SOLICTIORS DIVISION       100 $0.0$ $-11.15\%$ $1.285$ $-16.64\%$ SOLICTIORS DIVISION       590		Gov't Collections Cases Filed*	0	0	*	0	*	47	*
Restorative Justice       61       108       77.05%       130       20.37%       157       20.77         PROSECUTION DIVISION       Image: Construct on the state of the state	FAMILY DIVISION								
PROSECUTION DIVISION         Image: Miscame and Cases Filed         784         745         -4.97%         771         3.49%         716         -7.13           Highest Charged         Misdemeanor Cases Filed         919         752         -18.17%         643         -14.49%         6610         -5.13           Highest Charged         Family Violence         457         619         35.45%         377         -39.10%         3666         -2.924           DU/DWI         310         253         -18.39%         271         7.11%         449         65.68           DU/DWI         310         253         -18.39%         271         7.11%         449         65.68           VICTIM SERVICE CENTER         239         162         -32.22%         272         67.90%         227         -16.54           VICTIM SERVICE CENTER         1.622         1.471         -9.31%         1.307         -11.15%         1.285         -16.68           Criminal Injuries Compensation Awarded         \$90,571.27         \$162,808.65         79.76%         \$172,976.08         6.25%         \$60,022.45         -65.20           SOLICITORS DIVISION         Contract Review         590         508         -10.81%         123         -25.45%		Juvenile Delinquency/ Juvenile Drug Court	427	286	-33.02%	196	-31.47%	202	3.06%
Felony Cases Filed       784       745       -4.97%       771       3.49%       716       5.713         Misdemeanor Cases Filed       919       752       -18.17%       643       -14.49%       610       5.13         Highest       Family Volence       457       619       35.45%       377       -39.10%       366       2.922         Thef       339       295       -12.98%       394       33.56%       294       -25.38         DUI/DWI       310       253       -18.39%       271       7.11%       449       656.88         Drug Cases       239       162       -32.22%       272       67.90%       227       -16.54         VICTIM SERVE       C       1.622       1,471       -9.31%       1,307       -11.15%       1,285       -65.20         Criminal Injuries Compensation Awarded       \$90,571.27       \$162,808.65       79.76%       \$172,976.08       6.25%       \$60,202.45       -65.20         Restitution Collecte*       0       0       0       *       \$53,461.97       *       *       7.62       43.49         SOLICITORS       Icaga Guidance & Opinion Requests       185       165       -10.81%       123       -25.45%		Restorative Justice	61	108	77.05%	130	20.37%	157	20.77%
Misdemenor Cases Filed919752 $\cdot 18.17\%$ 643 $\cdot 14.49\%$ 610 $\cdot 5.13\%$ Family Violence45761935.45%377 $\cdot 39.10\%$ 366 $\cdot 2.92\%$ Theft339295 $\cdot 12.98\%$ 39433.56%294 $\cdot 25.38$ DU//DWI310253 $\cdot 18.39\%$ 271 $7.11\%$ 44965.68Dug Cases239162 $\cdot 32.22\%$ 27267.90%227 $\cdot 16.54\%$ VICTIM SERVICE CENTER1.622 $1,471$ $-9.31\%$ $1,307$ $\cdot 11.15\%$ $1,285$ $\cdot 68.20\%$ Criminal Injuries Compensation Awarded $890,571.27$ $8162,808.65$ $79.76\%$ $$172,976.08$ $6.25\%$ $$60,202.45$ $\cdot 65.20\%$ Restitution Collected*00* $$53,461.97$ * $$76,714.30$ $43.49\%$ SOLICITORS DIVISIONIIIIIIIIIILegal Guidance & Opinion Requests185165 $\cdot 10.81\%$ 123 $\cdot 25.45\%$ 22179.677ITTIGATIONIIIIIIIIIIIITTIGATIONIIIIIIIIIIIGovernmentChaim Atters Opened1811820.55\%1649.89\%1546.610%GovernmentChaim Opened991001.01\%12220.00%102 $\cdot 16.35\%$	PROSECUT	ION DIVISION							
$ \begin{array}{cccccccccccccccccccccccccccccccccccc$		Felony Cases Filed	784	745	-4.97%	771	3.49%	716	-7.13%
$\begin{array}{c c c c c c c c c c c c c c c c c c c $		Misdemeanor Cases Filed	919	752	-18.17%	643	-14.49%	610	-5.13%
Charged       Theft       339       295       -12.98%       394       33.56%       294       -25.38         DUI/DWI       310       253       -18.39%       271       7.11%       449       65.68         Drug Cases       239       162       -32.22%       272       67.90%       227       -16.54         VICTIM SERVICE CENTER       Image: Compensation Awarded       \$90,571.27       \$162,808.65       79.76%       \$172,976.08       62.5%       \$60,202.45       -65.20         Criminal Injuries Compensation Awarded       \$90,571.27       \$162,808.65       79.76%       \$172,976.08       6.25%       \$60,202.45       -65.20         Restitution Collected*       0       0       *       \$53,461.97       *       \$76,714.30       43.49         SOLICITORS DIVISION       Image: Contract Review       590       508       -13.90%       454       -10.63%       429       -5.51%         Legal Guidance & Opinion Requests       185       165       -10.81%       123       -25.45%       221       79.67         LTHIGATION DIVISION       Image: Consed       185       165       -10.81%       123       -25.86%       170       31.78         Government       Total Matters Opened	Highost	Family Violence	457	619	35.45%	377	-39.10%	366	-2.92%
DUI/DWI       310       253       -18.39%       271       7.11%       449       65.68         Drug Cases       239       162       -32.22%       272       67.90%       227       -16.54         VICTIM SERVICE CENTER       Image: Compensation Awarded       1.622       1.471       -9.31%       1.307       -11.15%       1.285       -1.68%         Criminal Injuries Compensation Awarded       \$90,571.27       \$162,808.65       79.76%       \$172,976.08       6.25%       \$60,202.45       -65.20         Restitution Collected*       0       0       *       \$53,461.97       *       \$76,714.30       43.49         SOLICITORS DIVISION       Image: Contract Review       590       508       -10.81%       123       -25.45%       429       -5.51%         Legal Guidance & Opinion Requests       185       165       -10.81%       123       -25.45%       221       79.67%         ITHIGATION DIVISION       Image: Cliphon Requests       185       165       -10.81%       123       -25.45%       221       79.67%         Government       Contract Review       190       100       10.81%       123       -25.86%       170       31.78%         Linit Guidance & Opinion Requests <t< td=""><td>0</td><td>Theft</td><td>339</td><td>295</td><td>-12.98%</td><td>394</td><td>33.56%</td><td>294</td><td>-25.38%</td></t<>	0	Theft	339	295	-12.98%	394	33.56%	294	-25.38%
VICTIM SERVICE CENTER         Image: Constraint of the image: Co		DUI/DWI	310	253	-18.39%	271	7.11%	449	65.68%
Total Victims Served         1,622         1,471         -9.31%         1,307         -11.15%         1,285         -1.689           Criminal Injuries Compensation Awarded Restitution Collected*         \$90,571.27         \$162,808.65         79.76%         \$172,976.08         6.25%         \$60,202.45         -65.20           Restitution Collected*         0         0         *         \$53,461.97         *         \$76,714.30         43.49           SOLICITORS DIVISION         -			239	162	-32.22%	272	67.90%	227	-16.54%
Criminal Injuries Compensation Awarded Restitution Collected*       \$90,571.27       \$162,808.65       79.76%       \$172,976.08       6.25%       \$60,202.45       -65.20         Restitution Collected*       0       0       *       \$53,461.97       *       \$76,714.30       43.49         SOLICITORS DIVISION       -<									
Restitution Collected*       0       0       *       \$53,461.97       *       \$76,714.30       43.49         SOLICITORS DIVISION		Total Victims Served	1,622	,	-9.31%	,	-11.15%		-1.68%
SOLICITORS DIVISION         Image: contract Review         Solicities opened         Solicities opened <td></td> <td>Criminal Injuries Compensation Awarded</td> <td></td> <td>\$162,808.65</td> <td></td> <td></td> <td></td> <td></td> <td>-65.20%</td>		Criminal Injuries Compensation Awarded		\$162,808.65					-65.20%
Contract Review         590         508         -13.90%         454         -10.63%         429         -5.51%           Legal Guidance & Opinion Requests         185         165         -10.81%         123         -25.45%         221         79.67           LTTIGATION DIVISION         Total Matters Opened         181         182         0.55%         164         -9.89%         154         -6.10%           Total Matters Opened         125         174         39.20%         129         -25.86%         1700         31.78%           Government         Claims Opened         99         100         1.01%         122         22.00%         102         -16.39%			0	0	*	\$53,461.97	*	\$76,714.30	43.49%
Legal Guidance & Opinion Requests         185         165         -10.81%         123         -25.45%         221         79.67           LITIGATION DIVISION         Image: Constraint of the second secon									
LITIGATION DIVISION         Image: Constant of the state of the								-	-5.51%
Total Matters Opened         181         182         0.55%         164         -9.89%         154         -6.10%           Total Matters Closed         125         174         39.20%         129         -25.86%         170         31.78           Government         Claims Opened         99         100         1.01%         122         22.00%         102         -16.39		· · ·	185	165	-10.81%	123	-25.45%	221	79.67%
Total Matters Closed         125         174         39.20%         129         -25.86%         170         31.78           Claims Opened         99         100         1.01%         122         22.00%         102         -16.39           Government         111         120         121         120.00%         101         -16.39	<b>LITIGATION</b>								
Claims Opened         99         100         1.01%         122         22.00%         102         -16.39           Government         Claims Opened         50         60         41.40%         51         20.00%         101         24.51		•							-6.10%
Government To an and the second	Governmen					_			31.78%
		•							-16.39%
	Claims	Claims Closed	70	99	41.43%	71	-28.28%	131	84.51%
			45	44	-2.22%	29	-34.09%	52	79.31%
ADMINISTRATION DIVISION									
		•		-	10.51%				<b>19.69%</b>
Walk-in Assistance*     0     19,486     *     17,314     -11.15%     18,570     7.25%       *New initiatives, no data for previous years     *New initiatives, no data for previous years     *		Walk-in Assistance*	ř	,	*	,	-11.15%	18,570	7.25%

**Performance Highlight** 

\*New initiatives, no data for previous years

The longevity of the Criminal Injuries Compensation Program was realized after a grant was secured that reimburses 60 cents of every dollar dispersed by the OAG to eligible victims of crime and their families. Over \$60,000 was awarded in FY19.

#### **Performance Highlight**

The Consumer Protection Division launched a new initiative to collect on outstanding obligations owed to Guam Memorial Hospital, the Department of Administration, and the Department of Revenue & Taxation. An audit by the Office of Public Accountability showed that GMH's partnerships with the OAG and DRT resulted in a 100.4%, or \$7.3M, increase in self-pay accounts. The 47 cases filed in court totaled over \$577k.

### **Our Performance**

- 1 Who We Are
- $\mathbf{2}$ **Our Performance**
- 3 The Budget
- 4 Looking Ahead

#### **Special Revenue Sources Trend**



A continuous increase in the Special Revenue Funds category is a result of a federal grant awarded to the OAG in 2018. The grant matches 60 cents of every dollar dispersed to eligible victims under the Criminal Injuries Compensation Program, with a 94% increase between FY18 and FY19.

The Child Support Enforcement Division is supported by a 66% federal match contribution, and for every dollar spent, the General Fund contributes 34 cents. In FY19 the General Fund contribution was decreased for this division as a budget strategy to utilize available funding from prior years, allowing the OAG to maximize its General Fund allocation towards other operational needs.

8%

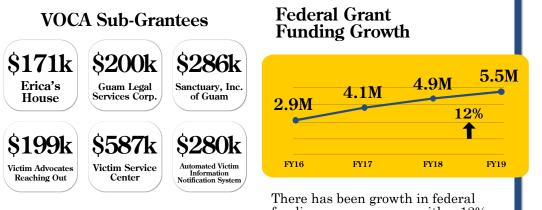
4%

#### **Expenditure Sources** 4% 1% Total: \$28,979,723.77 Total: \$20,552,492.94 34% **65%** 44% 52% General Funds: \$15,039,063.00 General Funds: \$13,423,668.62 Federal Funds: \$12,788,939.88 Federal Funds: \$6,979,515.10 Special Revenue Funds: \$1,151,720.89 Special Revenue Funds: \$149.309.22 **General Fund Expenditures** 10% Salaries and Benefits: \$10,614,261.45 2% ■ Travel: \$21,829.84

Contractual: \$496,489.92 Building Rent & Utilities: \$1,131,099.16 Total: Expense Reimbursement: (\$310,373.33) \$13,423,668.62 Otĥer\*: \$1,470,361.58 \*Supplies, Equipment, Drug Testing, Telephone, Capital, Federal Matching 76%

### VOCA

The Office manages the Victims of Crime Act (VOCA) federal grant and sub-grants this funding to organizations who provide direct services to victims of crime within the community. Funding from FY2018 was subgranted to six organizations in FY2019. Of note, \$1.3M was awarded in FY2019 but has yet to be subgranted. The OAG has until September 2022 to expend those funds.



funding year over year, with a 12% increase from FY18 to FY19.

The total budget for Fiscal Year 2019 was \$28,979,723.77. For the third consecutive year, the OAG's budget was reduced, presenting the opportunity to utilize technology to streamline operations and find creative solutions using existing resources.

**Revenue Sources** 

## The Budget

An independent audit was conducted, resulting in a clean audit opinion. For complete financial information, visit opaguam.org.

- 1 Who We Are
- 2 Our Performance
- 3 The Budget
- 4 Looking Ahead











### Priorities

#### Technology

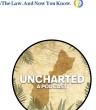


community access and information by updating its website and creating a presence on social media. This public

portfolio was created at little to no cost and has considerably expanded the availability of information on topics that are of interest to families, students, law enforcement, government entities and stakeholders, and the community-at-large.

The use of technology allowed the OAG to improve

Looking Ahead



#### COMING SOON:



The OAG intends to continue applying technology to increase efficiency and simultaneously reduce costs. A transition in email systems is expected to take place in the coming fiscal year and we continue to look at other ways to find technology-driven solutions.

We remain committed to supporting victims of crime. Part of the FY18 federal funding the OAG received will be dedicated to launching Guam's first automated victim notification system. The system will provide victims with free, confidential, 24-hour access to information and updates in ongoing criminal cases.



#### **The Environment**

The OAG is vested in protecting our Island's well-being, health, and environment. In this fiscal year, we filed suit to protect Guam's drinking water from PFAS contamination and sued drug manufacturers for fixing prices and false advertisement. There are several other national initiatives the OAG is considering which could bring positive change and resources to our community.



### Future Challenges and Economic Outlook

The COVID-19 pandemic has indescribably changed how we operate-as individuals, as families, as a community, as a government. Although we have changed how we operate as a government, what has not changed is our mission to serve our island. The immediate challenge that we face as an agency is fulfilling our mission in a way that is safe to our staff, their families and the individuals we serve.

We have launched new initiatives, such as collections on behalf of the government and efforts to address the Undistributed Child Support Collections, despite a reduction in budget over the last two years. We will build on the progress we've made, but we are also prepared to continue adapting once the full impact of COVID-19 on our island's people and economy is determined.



Do you have any suggestions on how we can improve our reporting? Contact Carlina Charfauros, Public Information Officer, at 475-3324 ext. 5020 or email ag@oagguam.org



#### Mandated Submittal: OAG FY19 CCR

Carlina Charfauros <ccharfauros@oagguam.org> Tue, Oct 27, 2020 at 4:10 PM To: speaker@guamlegislature.org, mbrillante@guamopa.com, admin@guamopa.com Cc: Camarine Ann Hopkins <camhopkins@oagguam.org>, OAG General Counsel <generalcounsel@oagguam.org>

Hafa Adai Speaker Muna-Barnes and Ms. Brillante,

The Office of the Attorney General respectfully submits its Fiscal Year 2019 Citizen-Centric Report via PDF attachment. I also provided a link to our website where it is posted: http://oagguam.org/wp-content/uploads/FINANCE/CCR/FIN-CCR-FY19-10.27.20-v3.pdf

Kindly confirm receipt of this email.

Continued health and well wishes to you and your staff.

Si Yu'os Ma'ase,

Carlina Charfauros

**Public Information Officer** 

Ufisinan Hinirat Abugao~Office of the Attorney General

1(671)475-3324 ext. 5020

Email: ccharfauros@oaqquam.org

590 S. Marine Corps. Drive Ste.901

Tamuning, Guam 96913

CONFIDENTIALITY NOTICE: This email and any files transmitted with it may be legally privileged and confidential and are intended solely for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any review, dissemination or copying of this email, or taking any action in reliance on the contents of this information is strictly prohibited. If you received this transmission in error, please notify us immediately by e-mail or telephone to arrange for the return of this email and any files to us or to verify it has been deleted from your system.



OAG FY19 CCR 10.27.20 Final.pdf 2576K