Performance Audit Report







#### **Alcoholic Beverage Control**

COMMISSIONERS:

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The Honorable Jackie Morris, Chairman Montgomery County Board of Commissioners 512 Wood Street Troy, NC 27371

Dear Chairman Morris,

We are pleased to submit this performance audit report of the Montgomery ABC Board. The objective of this audit was to examine existing policies, practices, and controls and to provide recommendations on methods to improve operating efficiency at the ABC Board.

This report consists of an executive summary, background information and operational findings and recommendations. The staff of the Montgomery ABC Board reviewed a draft copy of this report and their written comments are included.

We would like to thank the ABC Board and their staff for the assistance and cooperation provided to us during the audit and we hope you and your County Commissioners will find the report informative.

Respectfully,

Michael C. Herring Administrator

CC: Katrina Tatum, Mount Gilead Town Manager Brooks Lockhart, Biscoe Town Manager Tammy Kellis, Candor Finance Officer Robin Hussey, Star Finance Officer Greg Zephir, Troy Town Manager Lance Metzler, Montgomery County Manager

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### **EXECUTIVE SUMMARY**

By state law, the ABC Commission shall ensure that all local ABC Boards comply with established performance standards by conducting regular audits or performance evaluations. Performance standards shall include, but are not limited to, standards that address enforcement of ABC laws, store appearance, operating efficiency, solvency, and customer service. Performance audits are examinations of existing operating policies, practices, controls, and activities to determine those areas in which there may be a need for improvements. This audit was conducted in accordance with Government Auditing Standards. This report details findings and recommendations in the areas of organizational and operational issues.

To achieve the objectives of the audit, ABC Commission staff

- Reviewed applicable General Statutes, ABC Commission Rules, and administrative policies;
- Reviewed applicable reports and studies of ABC boards with similar size and geography;
- Verified compliance with Commission and Board policies;
- Reviewed organizational chart and job descriptions;
- Reviewed ABC store annual audit for the fiscal year 2010;
- Visited the stores;
- Interviewed key ABC store personnel.

The Montgomery ABC Board has responded to the performance audit recommendations and has taken steps toward becoming more profitable. Since our visit, the board has taken steps to minimize costs and provide training opportunities to include mixed beverage permitees. Internal controls have been modified to maintain proper segregation of duties and to adhere to statutes. Due to efforts in store operations, the 2011 financial audit showed a profit.

#### **BACKGROUND INFORMATION**

Montgomery County is located in the center part of the state. It was formed from Anson County in 1779 and was named after General Richard Montgomery. The US Census Bureau stated that the population in 2009 was 27,745. Although Montgomery County is an area with many historical towns, the most well-known towns are Biscoe, Candor, Mt. Gilead, Troy, and Star.

Chapter 145 of the 1969 Session Law authorized the towns of Montgomery County to hold an election upon receipt of a petition signed by fifteen percent of registered voters. The referendums were held on May 6, 1969. Votes for ABC stores passed in Biscoe 211 to 143 and in Mount Gilead 186 to 173. The first ABC store opened in 1969 in Mount Gilead. A mixed beverage election was held in Biscoe March 2004 and in Mt. Gilead April 2005. Both passed with 65% of the vote.

On May 6, 2008 a county-wide election was held with the majority of voters approving both the operation of ABC stores and mixed beverage sales. Subsequently, a merger agreement was signed between Montgomery County and Montgomery Municipal ABC Board. The ABC Board has six appointed members, one each from Biscoe, Candor, Mount Gilead, Star, Troy, and Montgomery County. The ABC board has retail sites in Biscoe and Mount Gilead.

The general manager serves as the budget officer and is responsible for the efficient operation of both Montgomery ABC retail stores and personnel. The finance officer provides the general manager/budget officer and the board with fiscal management, administrative support and assists with the day-to-day operations of the Montgomery ABC system. The Mount Gilead store has a store manager responsible for both overseeing and performing general management duties associated with the ABC retail store. The duties include retail sales, inventory control, record keeping, scheduling and supervising the store's clerks and assistant clerks under the guidance of the general manager. The Biscoe store has a full-time clerk who is responsible for general retail sales and simple stocking and record keeping. Both stores have two part-time or assistant clerks who are responsible for performing the same general duties, requirements and work as listed for the full-time clerks.

#### **Profitability**

For fiscal year 2010, the board showed a loss; total liquor sales were \$1,185,952; profit before distributions was -\$33,983, which resulted in a profit percentage to sales of -2.87%. Current year sales have increased over the previous year. In comparing sales with similar boards for the past ten years, Montgomery ABC sales have dropped while other similar size boards have followed the state's 56% ten year increase. *Refer to Chart 1 and 2.* 

Factors affecting sales and profitability:

- Adult working population has decreased 1% over the past ten years
- Population below poverty level has increased 37% over the past ten years
- 12.5 unemployment rate in Montgomery County

### $\underline{Distributions}$

S.L. 1969-145 requires the Montgomery ABC Board to make the following distributions quarterly:

- 50% to Biscoe, Candor, Mt Gilead, Star and Troy
- 50% to Montgomery County General Fund

In 2010, the Montgomery ABC Board did not make distributions. Over the past ten years, distributions have trended downward. *Refer to Chart 3*.

The law enforcement distribution follows 18B-805(c) (2). The Montgomery ABC Board is not required to make alcohol education distributions under 18B-805 (c) (3).

#### FINDINGS AND RECOMMENDATIONS

On April 26, 2011, ABC Commission Auditor, Moniqua S. McLean, visited the Montgomery ABC stores and interviewed Phillip Richardson, general manager, Lisa Wilson, finance officer, and other personnel. Following are the findings and recommendations relating to the performance audit:

#### 1. <u>Inventory Turnover</u>

The inventory turnover rate is calculated by dividing the cost of goods sold by the average inventory in the system. The Commission has set goals for inventory turns based on the frequency of deliveries. Below are the target turnover rates based on a delivery schedule:

- Daily/weekly deliveries target at 6 times per year
- Bi-weekly deliveries target at 5 times per year
- Monthly deliveries target at 4.5 times per year

The Montgomery ABC stores have a monthly delivery schedule. The inventory turnover rate for Montgomery is 2.5 which is below the target rate set by the Commission.

#### Recommendations:

- Identify dead stock for transfer to another board which has demand
- Request permission from the Commission for a price reduction to sell off slow moving products. Use proceeds for distribution or for more saleable inventory
- Take advantage of SPA's and quarterly price reductions whenever possible
- Use recipe cards, displays, and other marketing techniques to increase interest and sales

#### 2. Operating Cost

Operating costs are calculated by dividing total operating expenses less depreciation by the gross profit on sales. Below are the average cost ratios for boards with and without mixed beverage sales.

- o Boards with 3 or more stores with MXB cost ratio .67 or less
- o Boards with 3 or more stores without MXB cost ratio .94 or less
- o Boards with 2 stores cost ratio .83 or less
- o Single store boards with MXB cost ratio .77 or less
- o Single store boards without MXB cost ratio .93 or less.

The Montgomery ABC board has an operating cost ratio of 1.09 while the average for similar size boards is .83. In comparison with other two-store boards with similar sales volume, Montgomery's operating expenses are not out of line. To meet the goal of .83 or less and remain at current revenue levels, operating expenses must be less than \$300,000. To meet the goal of .83 or less and remain at current expense levels, revenues must be greater than \$1,500,000.

#### **Recommendations:**

- Request bids annually from various vendors to get the best rates possible on audit, credit card processing fees, and insurance and bonding rates. *Refer to Chart 4, 5, and 6.*
- Because salaries and benefits are the largest segment of operating expenses, analyze
  personnel hours to assess efficient personnel usage.

#### 3. Profit Percentage to Sales

The profit percentage to sales is calculated by dividing the profit before distributions by total liquor sales. The Commission has set efficiency goals based on the following breakdown:

- o Gross sales > \$10M target rate at 9%
- o Gross sales > \$2M target rate at 6.5%
- o Gross sales < \$2M target rate at 5%

The Montgomery ABC board has a profit percentage of -2.87% which does not meet the targeted rate set by the Commission.

#### **Recommendations:**

- Economic indicators do not support any significant increase in future sales. Monitor operating expenses carefully to maintain profitability.
- Continue to emphasize good customer service to both maintain and grow customer base.

#### 4. Working Capital

Working capital is total cash, investments and inventory less all unsecured liabilities. Gross sales means gross receipts from the sale of alcoholic beverages less distributions as defined in G.S. 18B-805(b)(2),(3), and (4). The Commission has set efficiency goals based on the following breakdown:

- o 4 months for boards with gross sales less than \$1.5M
- o 3 months for boards with gross sales less than \$50M and greater than or equal to \$1.5M
- o 2 months for boards with gross sales equal to or greater than \$50M

The Montgomery ABC Board has a working capital of \$295,107 and meets the targeted goal set by the Commission.

#### 5. Store Appearance

The Montgomery stores have 1,862 linear feet of shelf space. Each store stocks approximately 912 SKU's.

• While the stores are clean and well lit, they do not have a comprehensive shelf-management system in place. Most products were shelved in code number order. This caused some products to be displayed from left-to-right with largest size on the left and others right-to-left with largest size on the right. It also caused high profit items to be displayed on lower shelves.

- Bottles are not kept fronted as shelf stock is depleted.
- Many of the shelves are empty giving the appearance that there are not enough products available for sale. *See Appendix A.*

#### **Recommendations:**

- Develop an effective and efficient shelf-management system that better utilizes the spacing areas. Shelf management needs to be consistent and easily understandable. The proposed new rule NCAC 02R.1711 (a) states, "Each local board shall establish and maintain a shelf management plan. The local board shall establish policies within its plan that govern the following concepts:
  - (1) Set the higher price items on the upper shelves at eye level and set the low price items on the bottom shelves;
  - (2) Block categories in vertical sets per their category;
  - (3) Arrange bottle sizes so they increase left to right of the same item;
  - (4) Create brand billboard by stacking all brand sizes together;
  - (5) Set shelf space for a product equal to market share for the individual store after the product has been carried for a year;
  - (6) Set and maintain all bottles at the front of the shelf; and
  - (7) Discontinue low profit slow moving items."
  - (b) Each local board shall keep a copy of its shelf management plan at each store location and, upon request, provide a copy to a Commission representative."
- Keep bottles fronted so that customers can easily access the desired product as well as giving the store a more modern look.
- Eliminate or minimize empty shelving by increasing facings to fill in blank spots.
- Utilize one or more of the end caps for displaying new items, sale items, or discontinued items.

#### 6. Administrative Compliance Findings

- Board meeting minutes were viewed and followed the order of proceedings for conducting
  business meetings. Minutes should reflect that the meeting has been called to order, a
  record of attendees, approval of the minutes of the last meeting, any votes taken and how
  members voted, policies adopted, and any other business presented in sufficient detail so
  that anyone reading the minutes can understand what transpired.
- A law enforcement contract has not been adopted and filed with the Commission.
- The travel policy on file does not meet current statutory requirements. However, expense reimbursements for the current fiscal year do conform to the current policy.
- The current mixed beverage policy requires orders to be submitted Monday or Tuesday and picked up Thursday or Friday. Exceptions are made for special occasions and emergencies.
- Board does not have a policy on price discrepancies.

- The board has one credit card issued to the general manager and does not have a written credit card policy. The finance officer opens and reconciles the statement.
- Board member information on the Commission website does not reflect current appointment dates.
- Board members' compensation meets the current statutory requirements.
- The personnel manual was last updated in 1999.

#### Recommendations:

- Finalize the law enforcement contract and submit copy to Commission.
- Adopt a travel policy that meets requirements of 18B-700(g2) and file a copy with the Commission (2R.0909(c)). Because there are six appointing authorities, adopt the County's travel policy or the state policy. *Refer to Appendix B* (1) *for statute.*
- The Commission prefers an open mixed beverage policy that reflects good customer service and allows customers to order and pickup Monday through Saturday. This discourages permit holders from breaking the law by purchasing at retail.
- Adopt a price discrepancy policy. While it is true that the State has uniform pricing requirements, if a shelf tag is incorrect and shows a lower price than the register, it is good customer relations to honor it and just book the difference to cash over/short. The Commission will provide a sample policy upon request.
- Adopt a credit card use policy. Include a maximum limit allowed on purchases before a board member is notified for approval. The board is to be notified of all purchases over the limit. Once adopted, submit a copy to the Commission. Procedures for the usage of the credit card should address:
  - Who has authority to use the card
  - What types of purchases the card may be used for,
  - Personal usage is not allowed,
  - A detailed receipt for every transaction is required,
  - A purchase order must accompany each receipt
- Board members' appointment dates should reflect the most recent appointment on Commission website.
- Update employee handbook to conform to current board policies and use as a guide either appointing authority's employee manual or Commission approved policy. *See Appendix B* (2).

#### 7. Personnel/Training Compliance

- There is no training program for employees or mixed beverage permit holders. Employee training is conducted whenever the need arises and whenever new information is available.
- Employees refer to a calendar for scheduling purposes. The finance officer and general manager rely on the calendar to determine when employees have signed in or out for work.

#### **Recommendations:**

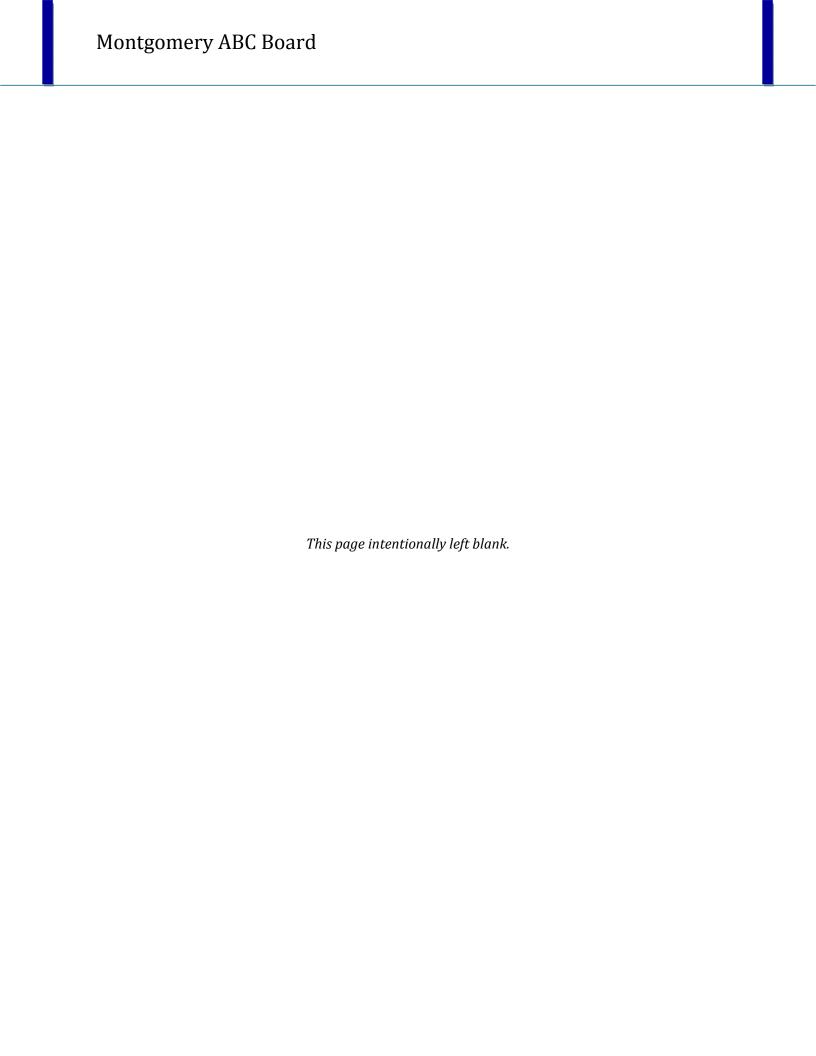
- Attend annual training, such as the Responsible Alcohol Seller Program, offered by the Commission and other approved venues.
- Create a checklist for use in training new employees and have each employee sign once training is complete.
- Use time sheets for signing in and out.
- All paychecks should be supported by time sheets that are reviewed and approved by signature. See insert for Time Card example.

#### 8. <u>Internal Controls</u>

- Checks are currently signed by both the finance officer and general manager. However, they do not bear the certificate which is required by GS 18B-702(q). Effective May 1 2011, all checks must include the certificate.
- Inventory is checked monthly by management and re-checked by the general manager if there are discrepancies.

#### Recommendations:

- All checks shall bear the certificate as required by 18B-702(q). *Refer to Appendix B (3)*. The certificate can be placed above or beside the signature lines to show that the check has been approved by the finance officer. The text may be shortened to accommodate space constraints.
- Having the board chairman co-sign checks instead of the general manager will strengthen the internal control system.
- Appoint a deputy finance officer to aid in the duties of the finance officer when he/she is absent. 18B- 702(p) "...all checks or drafts on an official depository shall be signed by the finance officer or a properly designated deputy finance officer. The chairman of the local board or general manager of the local board shall countersign these checks and drafts."
- When conducting physical inventories, have someone other than the person(s) responsible
  for inventory on a daily basis oversee the process. When this is not possible, have a
  bookkeeper, board member, and/or finance officer (someone not handling the inventory
  daily) perform spot checks.



#### Chart 1

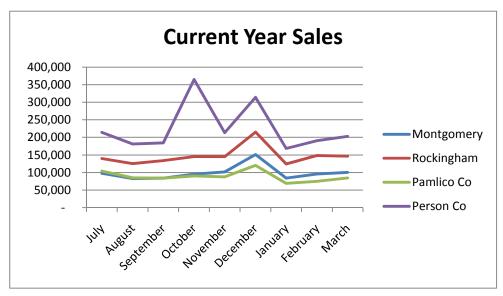


Chart 1 shows current year sales for similar size boards.

#### Chart 2

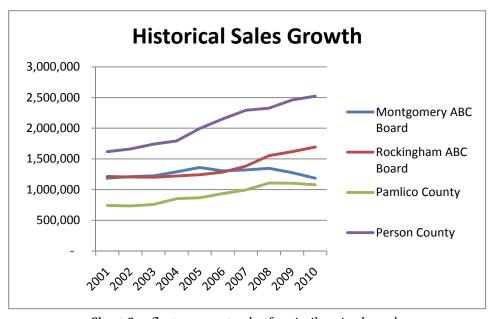


Chart 2 reflects current sales for similar size boards.

Chart 3

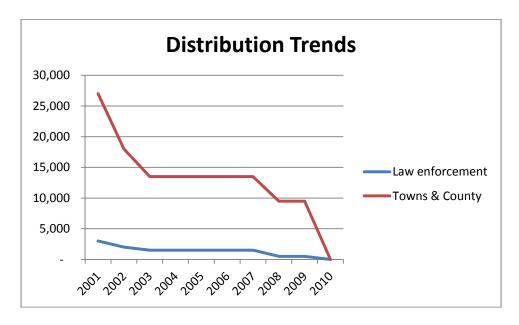


Chart 3 reflects the downward trend in profit distributions to the appointing authority over the past ten years.

#### Chart 4

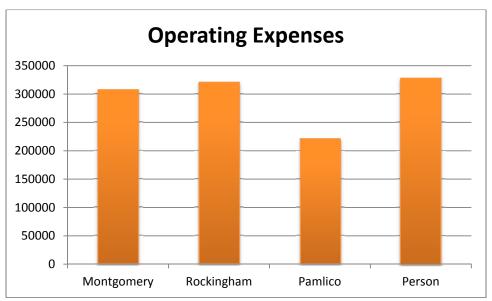


Chart 4 reflects operating expenses of similar size boards. Data based on FY 2010.

Chart 5

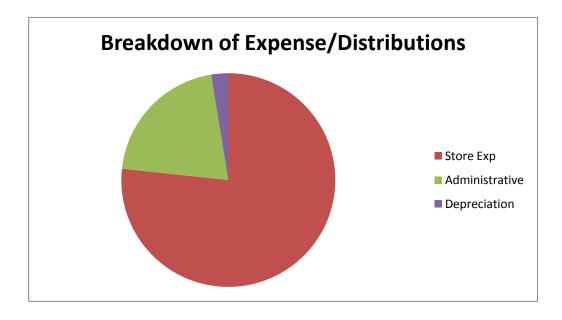


Chart 5 reflects the breakdown of operating expenses for Montgomery ABC Board.

Chart 6

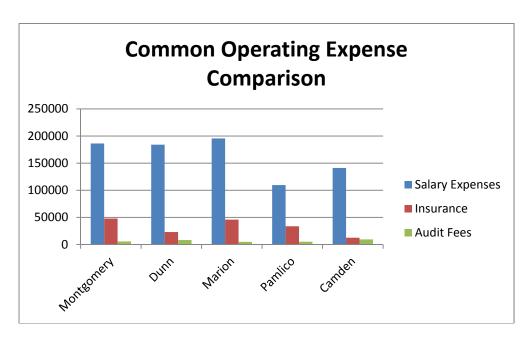


Chart 6 reflects comparing common expenses with similar two- store boards.

## **APPENDIX A**







#### APPENDIX B

- (1) 18B-700(g2) states "...the local board adopts a travel policy that conforms to the travel policy of the appointing authority and such policy is approved by the appointing authority [or adopts the state policy]."
  - NCAC 02R.0909 (c) Rules to be filed with Commission. Each local board shall file a certified copy of its travel policies and procedures, and any amendments thereto, with the Commission within 10 days of the adoption, or amendment, of the policies by the local board.
- (2) NCAC 02R.1009(b), states "A local board is encouraged to model its personnel policies and procedures after those adopted by the county or municipality in which it operates. (c) A local board shall not adopt a rule or policy that conflicts with the provisions of Chapter 18B or these Rules."
- (3) 18B-702(q) states "...each check or draft on an official depository shall bear on its face a certificate signed by the finance officer or a deputy finance officer approved for this purpose by the local board. The certificate shall take substantially the following form:

  "This disbursement has been approved in the manner required by G.S. 18B-702."

(Signature of finance officer).

## MONTGOMERY ABC STAFF RESPONSE TO

#### APRIL 26, 2011 NC ABC COMMISSION AUDIT

#### 1. Inventory Turnover

Items recommended by the Commission are currently practiced. Please note a small, rural Board with a once per month delivery must stock pile inventory. The General Manager is dedicated to ordering efficiently and ensuring items on SPA in ample reserve. Please note it continues to be detrimental to our profit margin when the Warehouse routinely "shorts" our monthly order especially on SPA items due to "out of stock".

#### 2. Operating Cost less Depreciation

Items recommended by the Commission are currently practiced.

#### Profit Percentage to Sales

Even though NC ABC gave no advice or recommendations in the profit percentage area, Staff would like to note the Montgomery Board has taken difficult and substantial measures to increase profits. Including salary cuts, a reduction in force, reduction in benefits, ban on conferences, conventions and no salary increases for 3 years.

Staff recommends rescinding the July 2010, 5% increase in Excise Tax. While Montgomery's profit percentage is currently -2.87% (returning the 5% would equal +2.13%) over the past 4 years the State wide growth has been -20.7 %. Given the opportunity to keep our local revenues we will make a profit.

#### 4. Working Capital

Adequate capital reserves are due to conservative spending and the experienced administration of the Board and General Manager. No plans exist for any major capital outlay.

#### 5. Store Appearance

Items recommended by the Commission are practiced. Note the inspection took place the morning we reopened after a very busy Easter Holiday weekend. Clerks were in the process of repositioning bottles and stocking shelves.

There is one exception; we position our very best sellers for the ease and convenience of the customer. A high priority is given to customer service, demand and convenience even if the brand does not conform to the Commission's desired "Shelf Management Plan" and/or "profiteering marketing strategies."

We do not classify less than 90 linear feet (5%) of unfilled shelves as "many empty". The empty bottom row shelves are minimal and all available items are amply stocked.

#### 6. Administrative Compliance Findings

#### Law Enforcement

Finalization of the law enforcement contract currently under negotiations with the Sherriff's Department is in addition to the enforcement provisions (established by Chapter 145, Senate Bill 170) the Board has with the Biscoe and Mount Gilead Police Departments. However, a copy of the additional law enforcement will be forwarded to the Commission upon contract execution.

#### Travel

State Travel Policy will be used effective June 22, 2011. The Board's previous policy was a culmination of the six appointing authorities' policies written to be the most cost effective policy available. As one unit of government within Montgomery County does not take precedence over another and to avoid the appearance of such, the State Travel Policy appears to be the best alternative. While we are conceding to the Commission's recommendation, it should be noted the State policy will be more costly.

#### Mixed Beverage Policy

Montgomery ABC Board nor staff requires mixed beverages orders to be placed on Monday or Tuesday for pick-up on Thursday or Friday. Early in the week ordering is a courtesy we have asked for but never required and seldom receive. This request is to ensure accurate and efficient service to the permit holder. We have one full-time employee (divided between two stores, 25 miles apart) and one part-time employee with the training and authority to process mixed beverage orders, while utilizing the one and only computer with processing capability. Under these circumstances and the budget constraints preventing allocating additional resources, last minute "rush" orders can be problematic. To insure proper control of sales; we try to avoid situations that create probability for errors.

We do take orders for same weekday pick-up and often deliver to restaurants enroute home from work (at no charge to the Board or customer). In urgent or special occasions we have filled orders on Saturday.

Staff maintains the Montgomery ABC Board provides excellent service to all our ABC Permit Holders. We do not accept that customarily not having the option of ordering on Saturday lends to a permit holder purchasing at retail or is justification for such.

#### Price Discrepancies

Staff verifies each item's price when the new prices are downloaded from the State. Quarterly SPA's are also checked item by item. Price discrepancies are not a problem we encounter. On the very rare (1 in 5 years) occasion this happens, we apologize to the customer, explain and correct the error. If the register price is incorrectly over-priced we will refund the difference. If the register price reflects the correct price and the shelf price is marked under, again we apologize, refund and change the shelf tag. State guidelines are followed.

#### Montgomery ABC Credit Card

A separate policy for the credit card is unnecessary and redundant. We do not differentiate the rules or policies based on the instrument used for payment i.e. check, credit card or electronic funds transfers. Each and every expenditure must adhere to the same strict guidelines set forth in GS 18B-702, standard governmental accounting procedures and the Approved Budget.

The card not issued to General Manager, the card is issued to Board. The General Manager is the authorized user. The card is locked in the safe, under the supervision of the Finance Officer.

#### Operations Manual

The Board and staff and been in the constant process of updating the Operations Manual over the past 18 months to conform with all the previous and ever changing new requirements. To the best of our knowledge the manual is in compliance.

#### 7. Personnel

#### Training

Training will be scheduled and coordinated upon contract execution with the Sheriff's Department; hopefully within the first quarter of FY 2012.

#### Time Cards

Work time of employees is recorded on a daily basis, under the supervision of the General and/or Store Manager. Hours coincide with the actual hours of store operations. We are not aware of any problems.

Staff did secure prices for updating to a clock in and out time card system. The upfront cost of \$3k - \$5k, plus yearly software maintenance fees to address a problem that we do not have is not recommended by Staff.

#### 8. Internal Control

All checks are now stamped with the required 18B-702(q) certification. Staff has no issue with the Chairman being the co-signer, appointment of a deputy officer or spot checking inventory.

## MONTGOMERY ALCOHOL BEVERAGE CONTROL BOARD

**Recommendation Follow-up** 

	REQUIRED	
RECOMMENDATION	BY	IMPLEMENTATION
	STATUTE	STATUS
Finalize law enforcement contract.		(Please provide documentation supporting
		implementation status.)
Adopt a travel policy that conforms to the County or the	<b>☑</b> Yes	☐ Fully Implemented
State.		☑ Partially implemented 50% complete.
	□ No	(Explain below.)
		☐ Not implemented (Explain below.)
		A law enforcement contract is under
		negotiations with the Sheriff's Department.
		The contract will be submitted once finalized.
		The State travel policy has been adopted.
Adopt a mixed beverage policy that allows flexible pickup		(Please provide documentation supporting
and ordering of permit holders.		implementation status.)
	□ Yes	☑ Fully Implemented
Adopt a price discrepancy policy that honors good customer		☐ Partially implemented%
service.	☑ No	complete. (Explain below.)
		☐ Not implemented (Explain below.)
		Board maintains the current mixed beverage
		policy understanding that if the need arises in
		urgent or special occasions orders will be
		placed and available for pickup.
		Board follows a price discrepancy policy
		exhibiting good customer service suggested
		by the Commission.

RECOMMENDATION  Adopt a credit card policy that implements the usage.	REQUIRED BY STATUTE	IMPLEMENTATION STATUS  (Please provide documentation supporting implementation status.)
	□ Yes ☑ No	☐ Fully Implemented ☐ Partially implemented% complete. (Explain below.) ☑ Not implemented (Explain below.)  The board did not feel it necessary to differentiate the rules based on the instrument used for payment.
Update the employee handbook to conform to current board policies.	□ Yes ☑ No	(Please provide documentation supporting implementation status.)  ☑ Fully Implemented □ Partially implemented% complete. (Explain below.) □ Not implemented (Explain below.)  The board updates the employee manual as new information exists.

RECOMMENDATION	REQUIRED BY STATUTE	IMPLEMENTATION STATUS
Attend annual training provided by the Commission.	□ Yes ☑ No	(Please provide documentation supporting implementation status.)  □ Fully Implemented □ Partially implemented 25% complete. (Explain below.) □ Not implemented (Explain below.)  The board will coordinate a training class upon implementing a law enforcement contract.
Have employees use time sheets for maintaining hours worked.	□ Yes ☑ No	(Please provide documentation supporting implementation status.)  □ Fully Implemented □ Partially implemented% complete. (Explain below.) □ Not implemented (Explain below.)  The board felt the current time keeping records were sufficient.

	REQUIRED	
RECOMMENDATION	BY	IMPLEMENTATION
	<b>STATUTE</b>	STATUS
To comply with GS 18B-702, all checks must have an		(Please provide documentation supporting
approved certificate and signed by the finance officer.		implementation status.)
	<b>☑</b> Yes	☑ Fully Implemented
Appoint a deputy finance officer.		☐ Partially implemented%
	$\square$ No	complete. (Explain below.)
		☐ Not implemented (Explain below.)
		The board has implemented a stamp with the
		required approval and all checks are stamped
		and signed by the finance officer and general
		manager. The Chairman has been appointed
		as a deputy finance officer in the event the
		finance officer is absent and cannot perform
		duties.
		(Please provide documentation supporting
Develop an effective and efficient shelf-management system.	<b>☑</b> Yes	implementation status.)
A shelf management system should be consistent and easily		☑ Fully Implemented
understood.	$\square$ No	☐ Partially implemented%
		complete. (Explain below.)
		☐ Not implemented (Explain below.)
		The board has implemented a current shelf
		management system that utilizes space and
		adheres to the marketing trends of the industry.
		Upon visit, the board was currently stocking
		shelves. See pictures below.

## MONTGOMERY ALCOHOL BEVERAGE CONTROL BOARD Recommendation Follow-Up



