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Justice Planning and Design

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Kewaunee County

Sheriff's Department & Jail / Public Safety Building

Presentation – Review of Phases 1 & 2

Thursday, April 17, 2020 | 4:30 PM

Team Members



VENTURE ARCHITECTS
Project Management / Leadership
Architecture, Physical Assessment, and Architectural Program

CRS, INC.
Justice / Operational Planning

HARWOOD ENGINEERING
Civil, Structural, Fire Protection, Plumbing, and HVAC Engineering

IMEG CORP.
Electrical, Telecommunications, Electronic Safety & Security Engineering

THE CONCORD GROUP
Independent Cost Estimating

STEWART DESIGN
Foodservice and Laundry Consultant

Presentation Outline

Introductions

1. Background
2. Recommendations
3. Needs Assessment : Bed Needs Assessment
4. Needs Assessment: Physical Assessment
5. Action Plan - Options
6. Staffing
7. Schedule

Questions and Answers





Background

1. Background

Kewaunee County Public Safety

Courthouse
Sheriff's Department



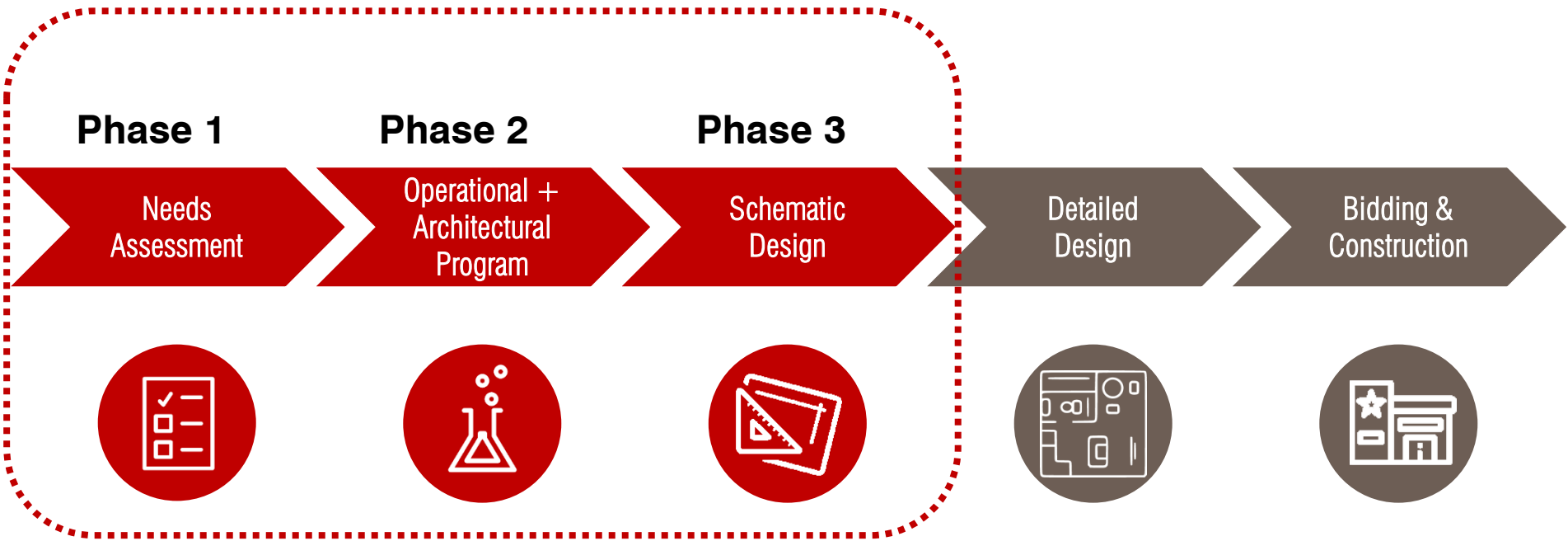
Safety Building
Jail and 911 Communications



1. Background

Project Steps

- Our Collaborative Approach
 - Communication + Consensus Building



Your Study



Recommendations

2. Recommendations

The Public Safety Facility Study Group recommends the County Board accept the Phase 2 Recommendation and Approve funding to move into Phase 3 Schematic Design.



2. Recommendations

Why a New Law Enforcement Center?

Four Reasons:

1. Physical Condition of the Jail
2. Current Design and Impact on Operations
3. Inadequate Bed Capacity
4. Future Jail Bed Needs



2. Recommendations

Physical Condition of the Jail

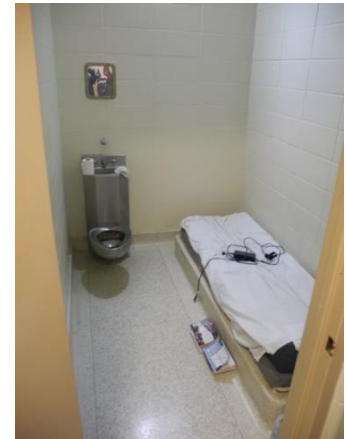
- Existing out of date Materials and Systems have Ongoing Maintenance Issues
- HVAC – No Backup Heat
- Fire Suppression – Only Fire Monitoring System
- Plumbing – Continuous Repair and Replacement
- Electrical / Power – Old and out dated



2. Recommendations

Current Design and Impact on Operations

- Jail (Public Safety Building)
 - Security – Inability to directly view inmates because of linear design
 - Housing – Inadequate because of size and design
 - Classification – Inadequate housing for inmate classification
 - Work Release (Huber)
 - Special Needs Beds – Inadequate because of size, design, location



2. Recommendations

Current Design and Impact on Operations

- Jail (Public Safety Building)
 - Security – Inability to directly view inmates because of linear design



Kewaunee County



Eau Claire County

2. Recommendations

Current Design and Impact on Operations

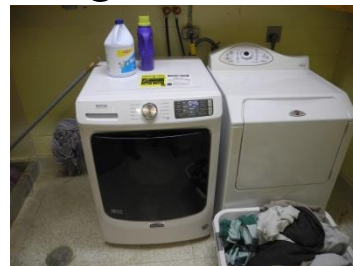
- Jail (Public Safety Building)
 - Housing – Inadequate because of size and design
 - Classification – Inadequate housing for inmate classification
 - Work Release (Huber)
 - Special Needs Beds – Inadequate because of size, design, location



2. Recommendations

Current Design and Impact on Operations

- Jail (Public Safety Building)
 - Support Areas – Inadequate because of size and design
 - Sally Port – Too small for all vehicles
 - Intake / Booking – Too small and poorly laid out
 - Showers – Incorrect locations
 - Laundry – Need commercial washer and dryer
 - Medical – Not correct types of required rooms
 - Programming – No dedicated space
 - Exercise – No dedicated space
 - Foodservice – Foodservice storage in in the sally port



2. Recommendations

Current Design and Impact on Operations

- Jail (Public Safety Building)
 - 911 Jail / Dispatcher – Inadequate for two person function. Master Control and Dispatcher should not be combined.
 - ADA Compliance – Many areas in Jail not ADA compliant
 - Door Openings
 - Showers
 - Turning Radius
 - Etc.



2. Recommendations

Current Design and Impact on Operations

- Sheriff's Department (Courthouse)
 - Administrative staff area is poorly laid out – Distractions for staff
 - Meeting rooms are too small for their function
 - Acoustical privacy in meeting rooms is inadequate
 - No dedicated staff breakroom



2. Recommendations

Inadequate Bed Capacity

- Does not meet present and future bed needs
 - 22 Current Bed Rated Capacity
 - 18 Current Bed Design Capacity (85%)
 - Average Daily Population of 41
- Does not provide adequate housing for inmate classification
- All female inmates are housed out of the County

2. Recommendations

Future Jail Bed Needs

- Current Public Safety Building design and location does not provide for future expansion





Needs Assessment: Bed Needs Assessment

Estimating Future Bed Needs

- Collect and analyze information and data about the county, criminal justice system, and jail inmates
- Interview stakeholders to identify past practices, future needs, and policies
- Use monthly Average Daily Population (ADP) to generate a 20-year forecast as a starting point

3. Needs Assessment: Bed Needs Assessment

Estimating Future Bed Needs

- Identify changes that could change future demand.
- Recommend policies and practices that will improve local criminal justice system and influence future jail us
- One recommendation is to create a County Criminal Justice Coordinating Council.

3. Needs Assessment: Bed Needs Assessment

Past Jail Used Determined by Many Factors and Policies

- Average Daily Population (ADP) has increased by 49% since 2009
- Slightly lower rate of increase for females
- Overall - 4.9% more ADP per year

3. Needs Assessment: Bed Needs Assessment

The number of beds needed to safely house an ADP of 61.4 is determined by adding a Peaking Factor, a Classification Factor, and a Maintenance Factor

Projected ADP 20 Years =	Inmates 61.4
Plus Peaking Factor of 13.8%	8.5
Plus Classification Factor of 12%	8.4
Plus Maintenance Factor of 5%	3.9
Total Projected Beds =	82.2



Needs Assessment: Physical Assessment

4. Needs Assessment: Physical Assessment

Physical Condition of the Jail

- Built in 1968 (51 years old)
- Existing Out of Date Materials and Systems Have Ongoing Maintenance Issues
 - Roof – Ongoing Leaks
 - Security Locks – Old and Cannot get Replacement Parts
 - Windows and Doors – Potential Future Problems



4. Needs Assessment: Physical Assessment

Physical Condition of the Jail

- Heating, Ventilating, and Air Conditioning (HVAC)
 - Steam to Hot Water
 - Inadequate to heat Jail in winter
 - No back up heat if boiler goes down
 - Central area of Jail does not meet outside air requirements



4. Needs Assessment: Physical Assessment

Physical Condition of the Jail

- Fire Suppression System
 - Only fire monitoring system



4. Needs Assessment: Physical Assessment

Physical Condition of the Jail

- Plumbing
 - Existing piping is original to the Jail and is reaching useful life expectancy
 - Drainage problems
 - Continuous repair and replacement



4. Needs Assessment: Physical Assessment

Physical Condition of the Jail

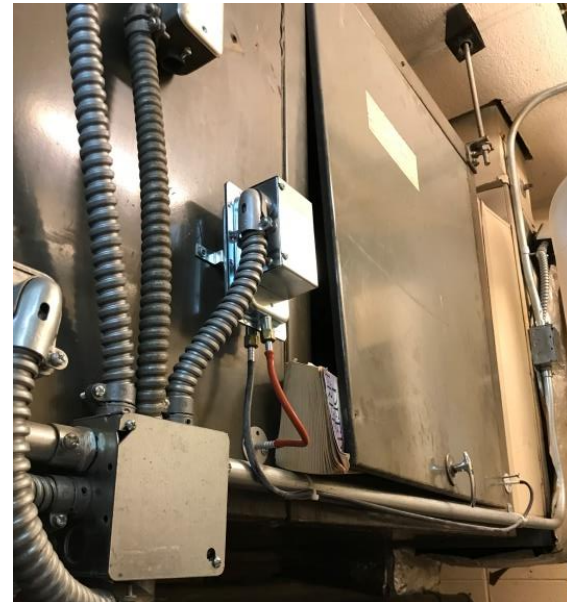
- Electrical
 - Lighting
 - Manual controls; not automatic
 - Lighting fixtures are original from 1968
 - Jail area fixtures are not detention grade



4. Needs Assessment: Physical Assessment

Physical Condition of the Jail

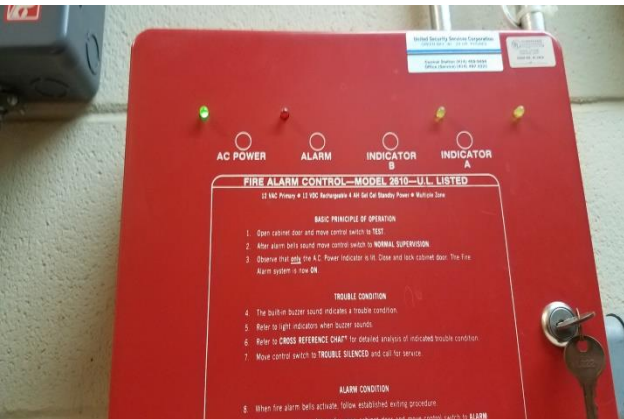
- Power
 - Building services is overloaded
 - Electrical panel boards are beyond useful life
 - Multiple code violations with backup generator
 - Secure area outlets and switches are not detention grade



4. Needs Assessment: Physical Assessment

Physical Condition of the Jail

- Fire Alarm System
 - No smoke / heat detection in key locations
- Video Surveillance
 - No exterior cameras
 - No sally port cameras
 - Cameras do not have detention grade housing
- Access Control
 - No electric control of cell / holding door locks





Action Plan - Options

5. Action Plan - Options

Current Facilities



1.33 Miles

- 1. Fleet
- 2. Armory
- 3. Impound
- 4. Workout/Training
- 5. Evidence Storage

- 1. Public Safety Building
- 2. Courthouse
- 3. Sheriff's Department
- 4. Jail Museum

5. Action Plan - Options

Summary Of All Options Considered

Option	Recommendation	Cost / Benefit Analysis
Option 1	Abandon Jail	Study
Option 2	Remodel Public Safety Building	Remove From Consideration
Option 3	Addition and Remodel Onsite	Remove From Consideration
Option 4	New Jail (ONLY) Onsite	Study
Option 5	New LEC (Jail & Sheriff) Onsite	Study
Option 6	New Jail Offsite (site selection TBD)	Remove From Consideration
Option 7	New LEC (Jail & Sheriff) Offsite (site selection TBD)	Study

5. Action Plan - Options

Option 1

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Study

OPTION 1 – ABANDON Jail

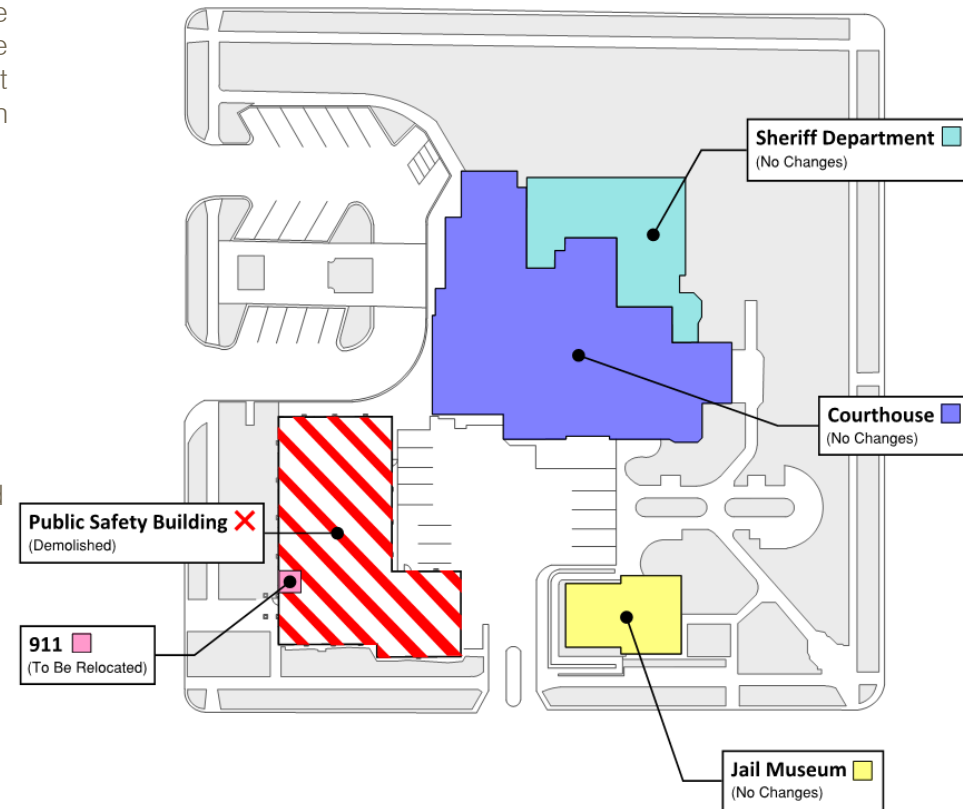
This option explores what the future for Kewaunee County might look like if the County were to completely abandon the Public Safety Building (Jail) and refrain from building a new jail. Kewaunee County would explore the option to contract with adjacent Jail county facility (ies), and pay for the transportation of inmates to and from those neighboring county facilities, including physical appearances at the Kewaunee County Courthouse. The 911 Communications in the current Public Safety Building would have to be moved to a new location (TBD).

Advantages

- With the absence of the Public Safety Building, space on the existing County campus is free for future development, including parking.
- Potentially one of the least initial first cost options.

Disadvantages

- Kewaunee County would be responsible for per diem bed rental costs and for inmate travel expenses between other counties and the Kewaunee County Courthouse.
- The uncertain future for Jail bed rental would impact future costs.
- Kewaunee County Public Safety Building staff would be impacted.
- The Kewaunee County Sheriff would still be responsible for the safety and wellbeing of their Kewaunee inmates housed in other facilities.
- No changes to the Sheriff's Department.



5. Action Plan - Options

OPTION 4 – NEW JAIL (ONLY) ONSITE

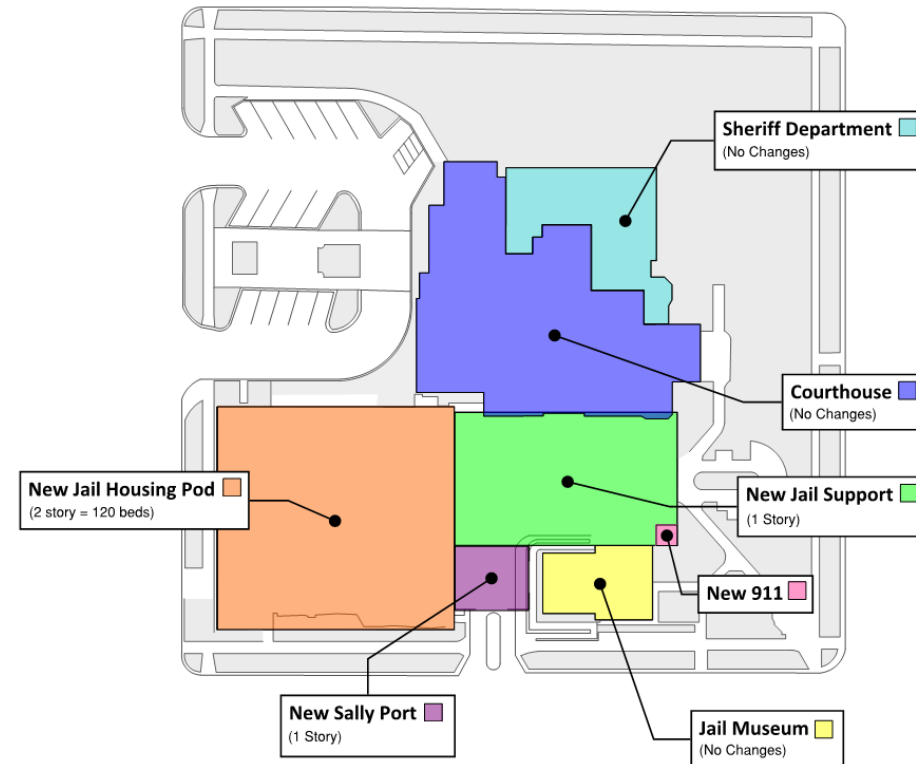
This option explores the possibility of Kewaunee County demolishing the existing Public Safety Building and constructing an entirely new Jail on the existing Courthouse site. Consequently, in this option, the 911 Sheriff Communications could be relocated into the Sheriff's Department that is located in the Courthouse.

Advantages

- A completely new Jail facility would meet modern jail standards, including improved operations, safety, inmate bed capacity, and classification.
- The land to build a new LEC on the existing site is already owned by Kewaunee County.
- Kewaunee County Public Safety Building staff would continue to work within the County.
- With the Jail on the same block as the Courthouse, inmate movement to Court can be secure.

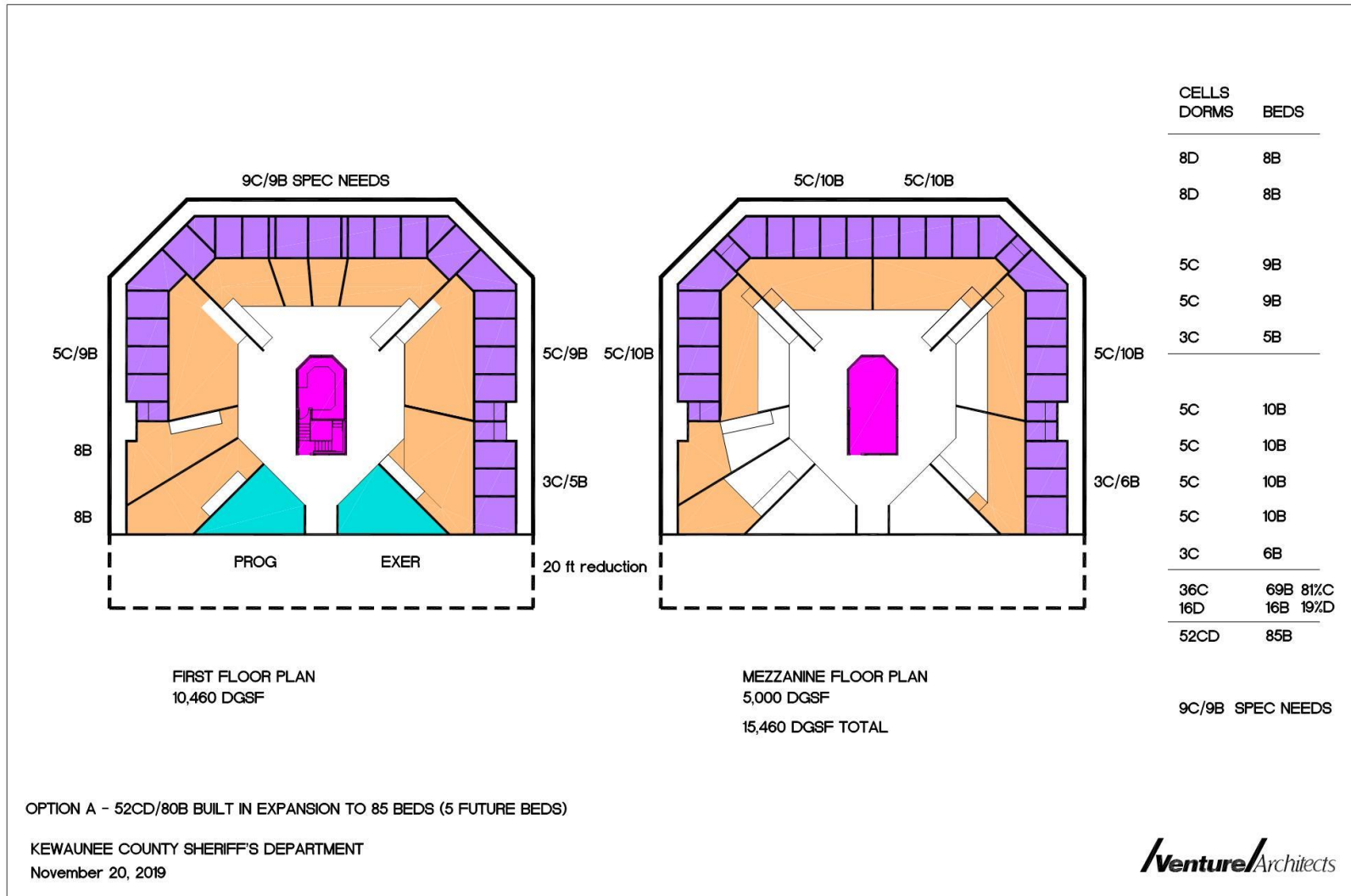
Disadvantages

- A new jail will increase jail staff and therefore increase the overall staff expenses.
- No changes to the Sheriff's Department.



5. Action Plan - Options

Housing Pod Design – 52 beds/expand to 85 beds



5. Action Plan - Options

Housing Pod Design – Dallas County (IA) (Example)



5. Action Plan - Options

Options 4, 5, & 7

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Housing Pod Design – Dallas County (IA) (Example)



5. Action Plan - Options

Option 5

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Study

OPTION 5 – NEW LAW ENFORCEMENT CENTER (JAIL & SHERIFF) ONSITE

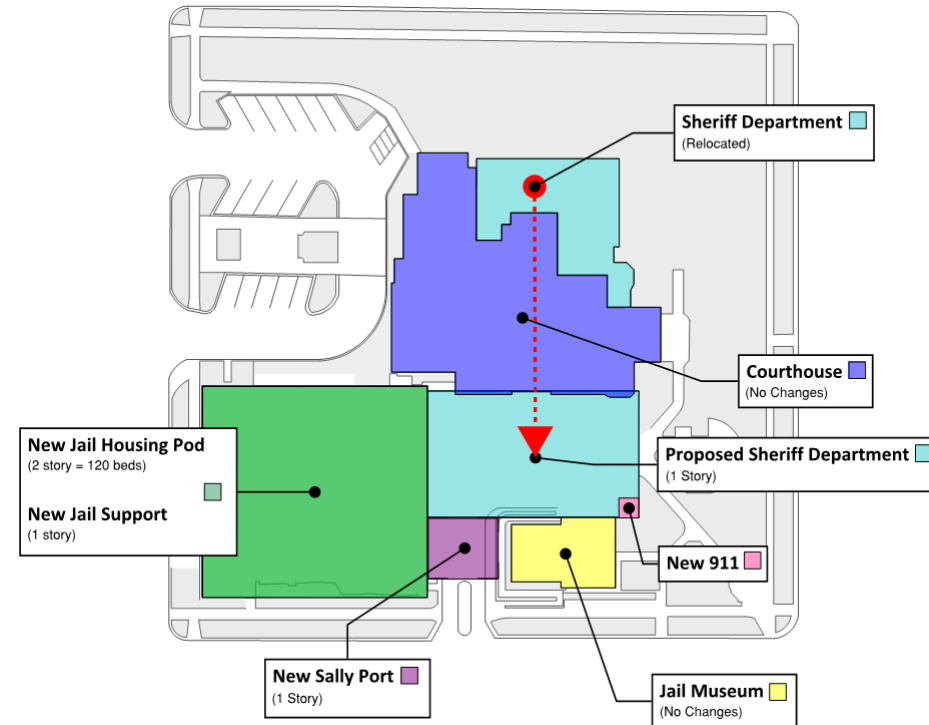
This option explores the possibility of Kewaunee County demolishing the existing Public Safety Building and constructing an entirely new jail and sheriff's department on the existing Courthouse site, including: Jail, Sheriff, and 911 (except the Sheriff's Garage), to a new Law Enforcement Center (LEC) constructed on the existing Courthouse site.

Advantages

- A completely new LEC onsite allows for an upgraded jail facility to meet modern standards, including improved operations, safety, inmate bed capacity, and classification.
- The land to build a new LEC on the existing site is already owned by Kewaunee County.
- Kewaunee County would not be financially burdened to pay for inmate travel for physical appearances at the existing Kewaunee County Courthouse.
- The Sheriff's Department, currently in basement of the courthouse, would be vacant for future Courthouse related functions.

Disadvantages

- Kewaunee County would be required to use other county jail facilities until construction is complete.



5. Action Plan - Options

OPTION 7 – NEW LAW ENFORCEMENT CENTER (JAIL & SHERIFF) OFF SITE (site selection TBD)

This option explores the possibility of Kewaunee County moving all Jail, Sheriff's Department functions, including: Jail, Sheriff, 911 Communications, and the Sheriff's Garage to a new facility constructed offsite. This option will require a site of at least 8 acres.

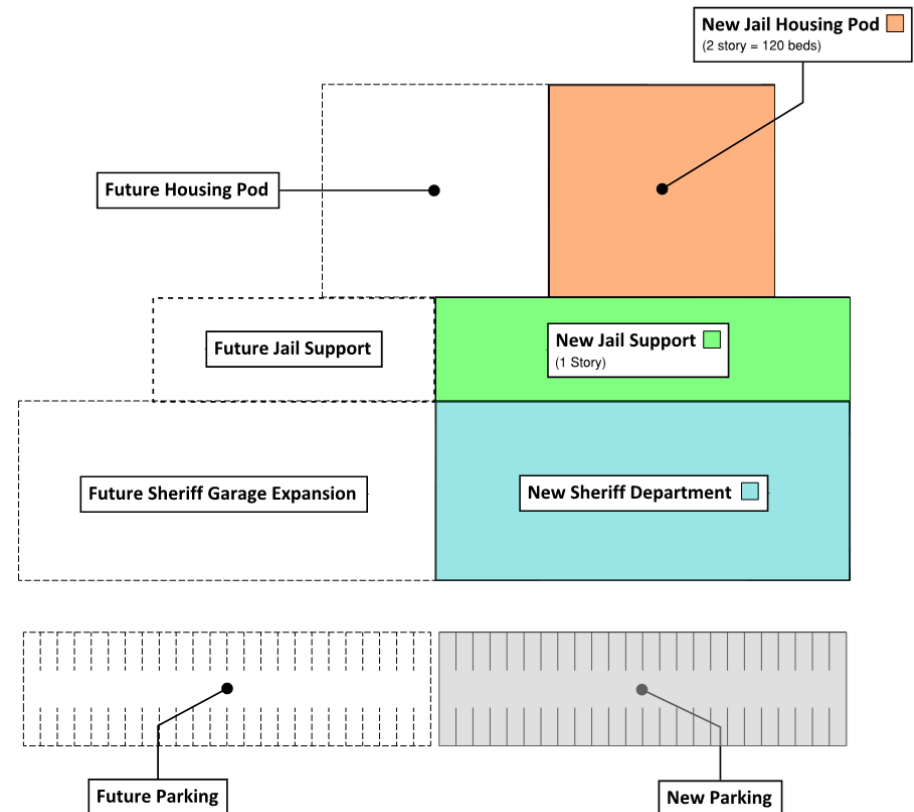
Advantages

- A completely new jail facility would meet modern jail standards, including improved operations, safety, inmate bed capacity, and classification.
- Future jail expansion can happen with this option, trusting the site is large enough.
- This option completely consolidates and organizes all Sheriff functions into one newly constructed facility.
- Kewaunee County Public Safety Building staff would continue to work within the County.

Disadvantages

- Kewaunee County would be responsible for inmate travel expenses between the new facility and the Courthouse, including physical appearances to Court.
- A newly constructed facility combining all Sheriff operations would require a large area of buildable space, including an ideal location with the County.
- May require land acquisition and associated costs.

Study



5. Action Plan - Options

Summary of Viable Options

Option	Recommendation	Cost / Benefit Analysis
Option 1	Abandon Jail /Rent Beds	Study
Option 4	New Jail Onsite (Courthouse)	Study
Option 5	New LEC (Jail & Sheriff) Onsite (Courthouse)	Study
Option 7	New LEC (Jail & Sheriff) Offsite	Study

5. Action Plan - Options

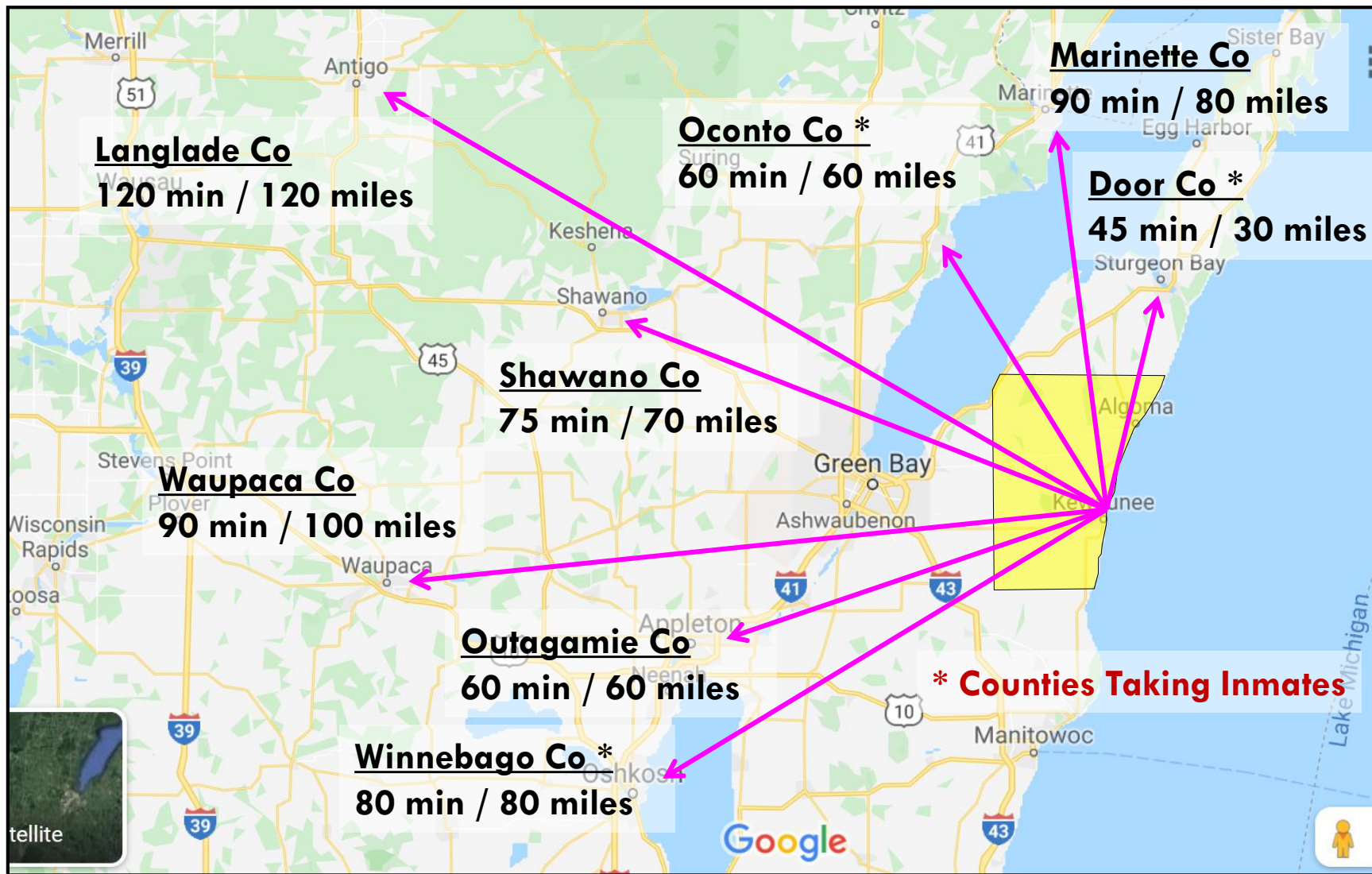
Option 1

Assumptions

- All inmates are shipped to other Counties
- Sheriff's Department remains in existing Courthouse
- Existing Jail could be demolished for additional existing Courthouse parking
- Existing 911 will have to be relocated (site TBD)

5. Action Plan - Options

Option 1



5. Action Plan – Options

Option 1

Adjacent Counties – one officer transport

- Door County Limited with a 90-day opt out clause
- Manitowoc County Overcrowded w/no expansion plans
- Brown County Will be full with own inmates

Counties Not Taking Inmates

- Marinette County
- Shawano County
- Waupaca County
- Outagamie County
- Langlade County (Don't Know)

5. Action Plan - Options

Option 1

Analysis & Recommendation – Remove from consideration

- Requires new arrests to be booked out of County / impacts all local police departments
- Requires additional staff to move inmates to/from court and booking
- Eliminates/complicates opportunity for Huber work release placing additional strain on families
- Drastically limits any potential for programming to reduce recidivism

5. Action Plan - Options

Option 1

Analysis & Recommendation – Remove from consideration

- Option is only relevant if there are available rental beds
- While a short term solution, it places Kewaunee County's future in others' hands with no guarantee for future contracts (high-risk inmates, treatment, programming)
- Results in revenue loss for probation reimbursement and SCAAP grants
- If a decision to re-enter the Jail business in the future, it will be difficult (cost of inflation, staff training, etc.)

5. Action Plan - Options

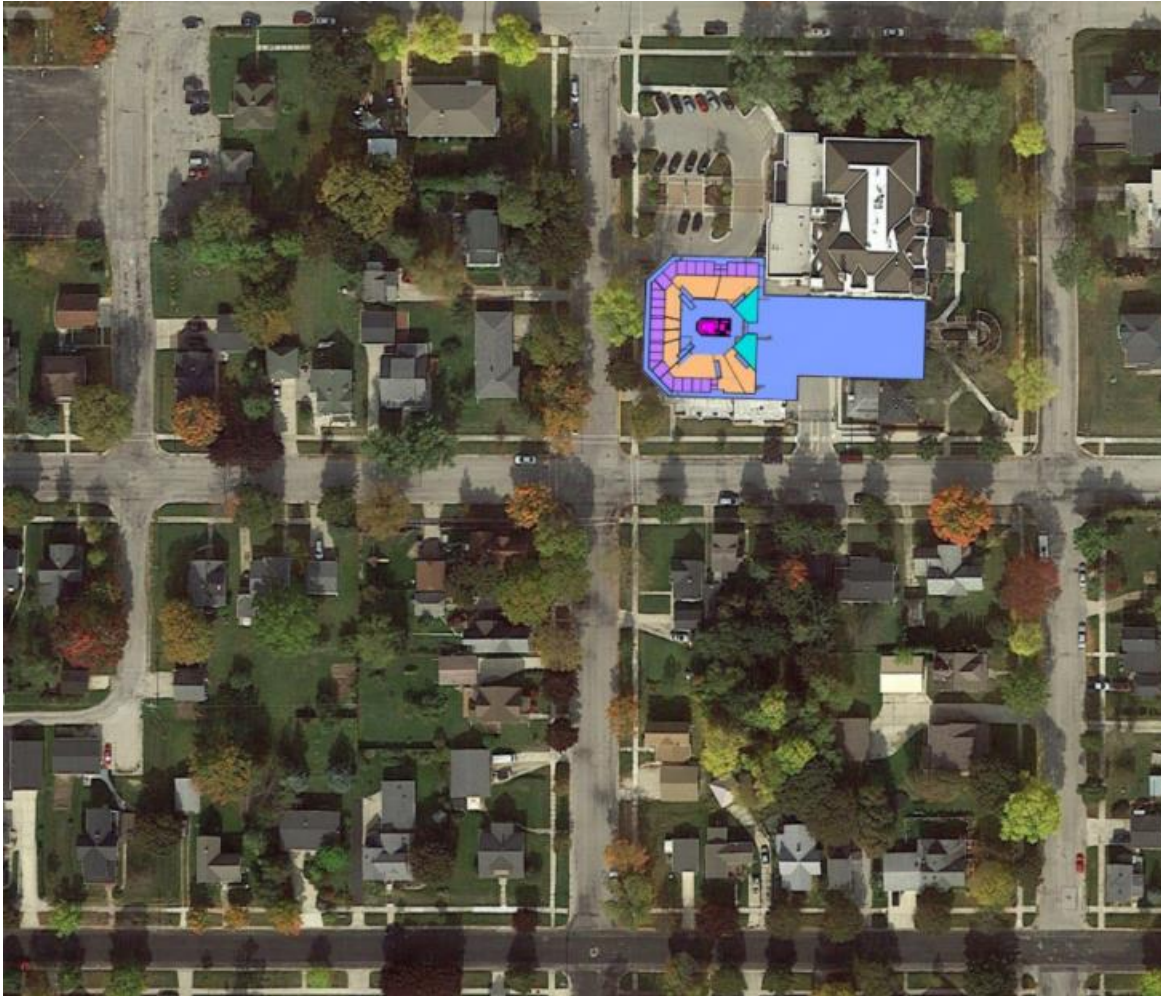
Option 4

Assumptions

- New 52 bed Jail (expandable to 85 beds), Jail Support, and 911 Communication
- 3-story building built on the site of the existing Jail
- Sheriff's Department remains in the existing Courthouse
- Existing Jail is demolished
- Secure connection between the new Jail and the existing Courthouse
- Requires land acquisition for additional parking

5. Action Plan - Options

Option 4 Site Plan – Building & Parking

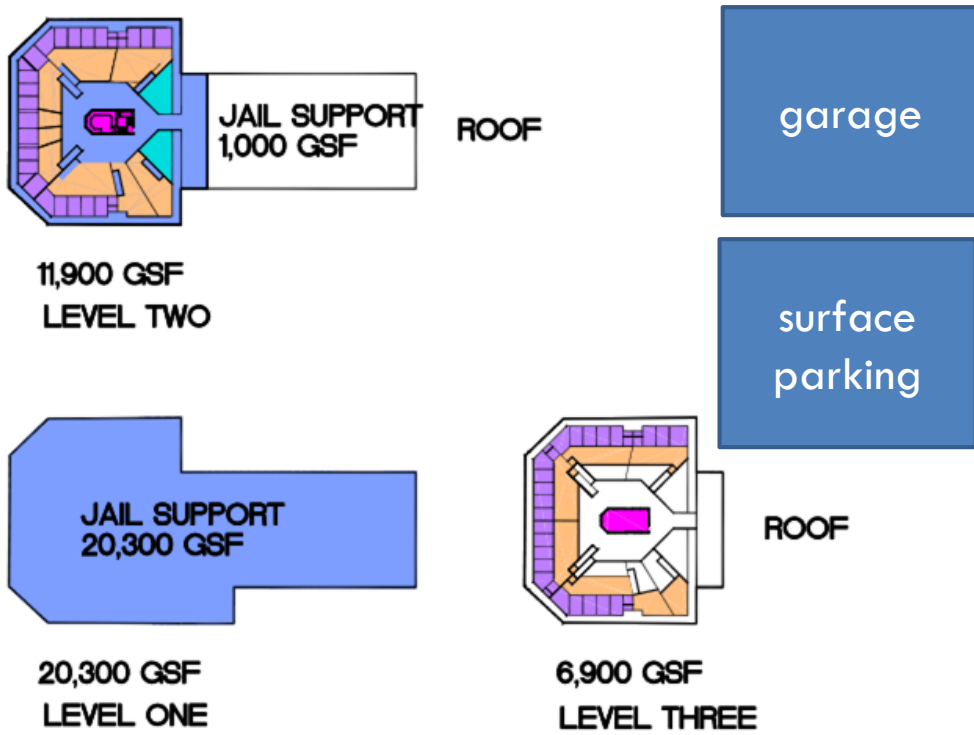


5. Action Plan - Options

Option 4

SHERIFF NEEDS 26,083 GSF
SHERIFF HAS 3,700 GSF

JAIL SUPPORT NEEDS 21,338 GSF
JAIL SUPPORT HAS 21,300 GSF



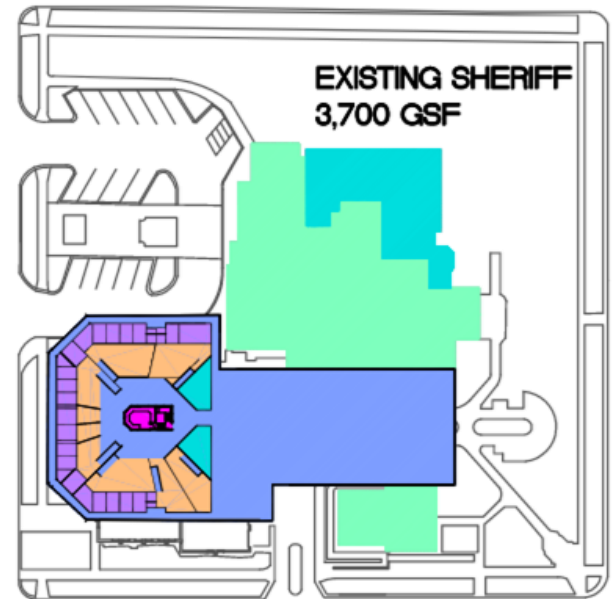
11,900 GSF
LEVEL TWO

20,300 GSF
LEVEL ONE

6,900 GSF
LEVEL THREE

39,100 TOTAL GSF

NO FLEET GARAGE/ARMORY/EXISTING SHERIFF TO REMAIN
ONSITE OPTION



OPTION DIAGRAM
THREE LEVEL JAIL

5. Action Plan - Options

Option 4

Capital Costs (Bid Summer 2021)

- Construction Cost \$18,975,222
Based on Current Construction Costs
- Other Project Costs (18%) \$2,934,227
- Temporary costs during construction \$4,163,675 *

Total Project Cost \$26,073,124

Project Cost Range

Low \$24,769,468

High \$27,376,780

* Includes the the cost to house inmates for 18 months during construction, dispatch wages, and moving Dispatch Center equipment.

5. Action Plan - Options

Option 4

Capital Costs (Bid Summer 2021)

- Construction Cost
 - Site Work
 - Building Construction
 - Fixed Equipment
 - General Conditions (16%)
 - Design Contingency (10%)
 - Escalation to Mid-Point of Construction

5. Action Plan - Options

Option 4

Capital Costs (Bid Summer 2021)

- Building Construction
 - Substructure: Foundations
 - Shell: Superstructure, Exterior Enclosure, Roofing
 - Interiors: Interior Construction, Interior Finishes
 - Services: HVAC
 - Special Construction: Miscellaneous Items

5. Action Plan - Options

Option 4

Capital Costs (Bid Summer 2021)

- Other Costs
 - Construction Contingency (5%)
 - A/E Fees (7%)
 - Plan Review Fees
 - Surveys and Testing
 - Phone and Radio Systems
 - Video Court Equipment
 - Moveable Furnishings and Equipment

5. Action Plan - Options

Option 4

Analysis & Recommendation – Remove from consideration

- Requires additional Jail staff due to multi-level design
- Limits future growth and expansion for functions: Jail, Sheriff, Courthouse
- Requires similar costs of Option 1 during construction (18 months)
- Requires same staffing for dispatch during demolition and construction (18 months)

5. Action Plan - Options

Option 5

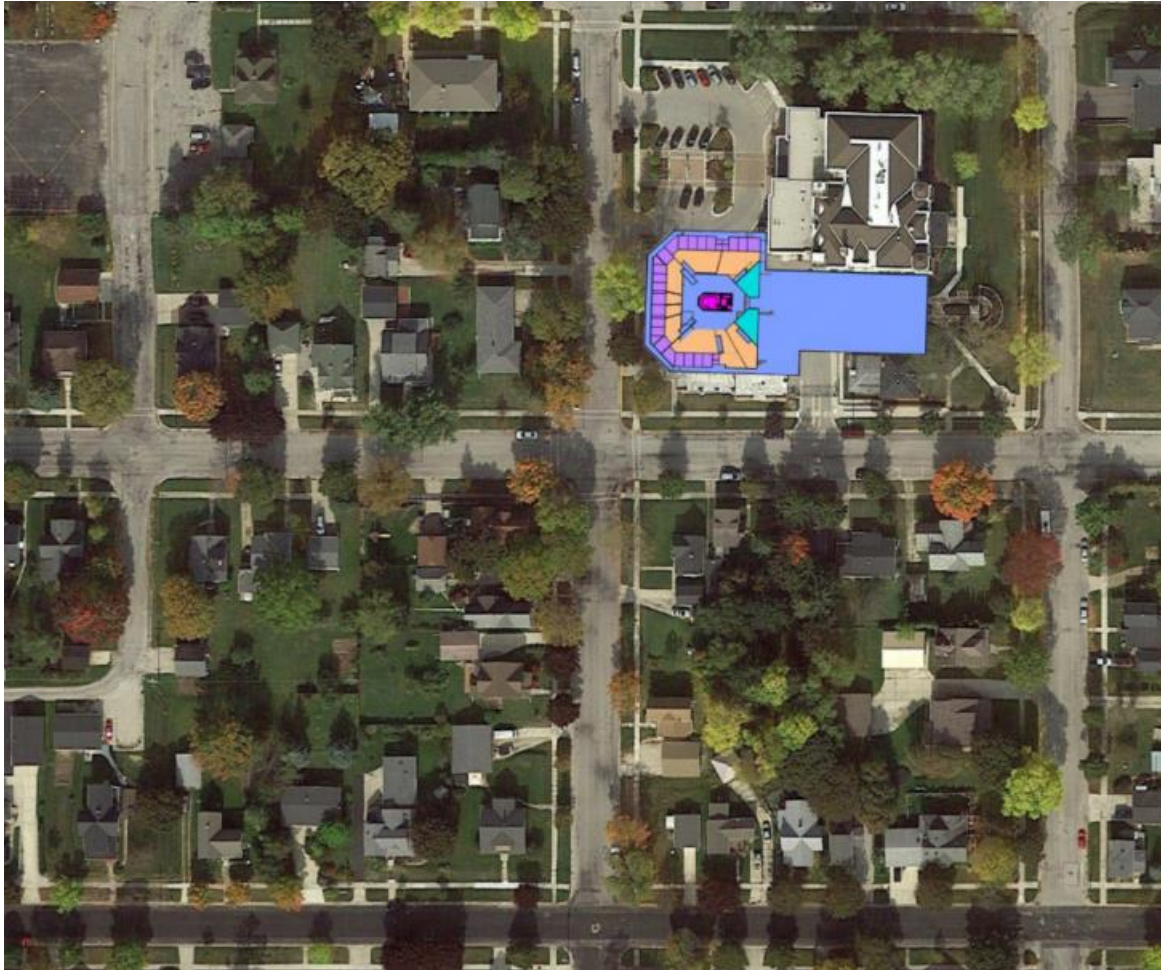
Assumptions

- New 52 bed Jail (expandable to 85 beds), Jail Support, Sheriff's Department, and 911 Communication
- 4-Story building built on the site of the existing Jail
- Existing Jail demolished
- Secure connection between new Jail and existing Courthouse
- Requires land acquisition for additional parking

5. Action Plan - Options

Option 5

Site Plan – Building & Parking

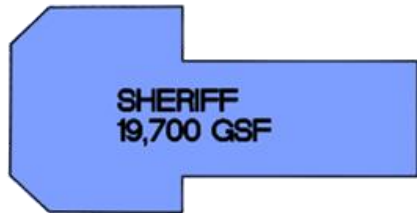


5. Action Plan - Options

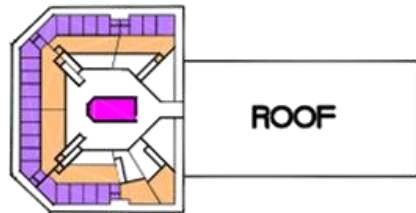
Option 5

SHERIFF NEEDS 26,083 GSF
SHERIFF HAS 26,100 GSF

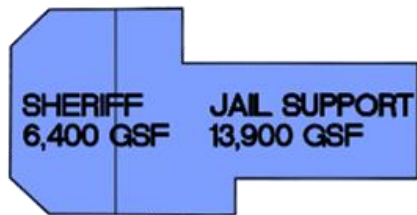
JAIL SUPPORT NEEDS 21,338 GSF
JAIL SUPPORT HAS 22,600 GSF



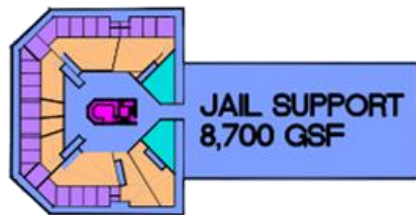
19,700 GSF
LEVEL TWO



6,900 GSF
LEVEL FOUR



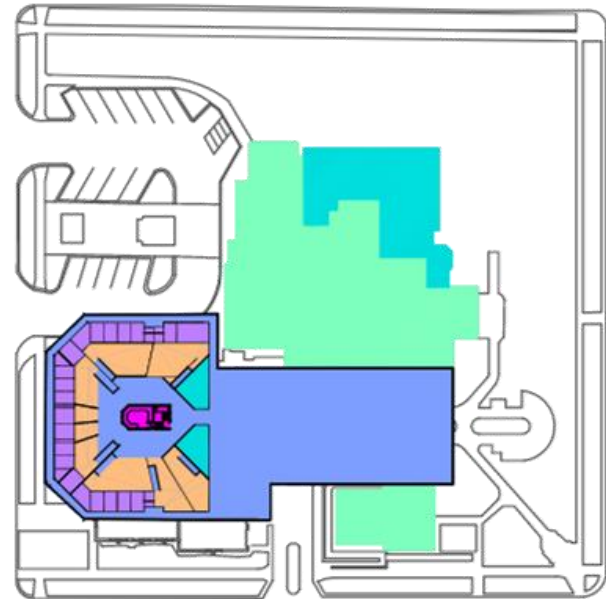
20,300 GSF
LEVEL ONE



19,700 GSF
LEVEL THREE

66,600 TOTAL GSF

NO FLEET GARAGE/ARMORY/NEW SHERIFF
ONSITE OPTION



OPTION DIAGRAM
FOUR LEVEL JAIL/SHERIFF

5. Action Plan - Options

Option 5

Capital Costs (Bid Summer 2021)

- Construction Cost \$25,909,682
Based on Current Construction Costs
- Other Project Costs (16%) \$3,811,020
- Temporary costs during construction \$4,163,675 *

Total Project Cost \$33,884,377

Project Cost Range

Low \$32,190,158

High \$35,578,596

* Includes the the cost to house inmates for 18 months during construction, dispatch wages, and moving Dispatch Center equipment.



5. Action Plan - Options

Option 5

Analysis & Recommendation – Remove from consideration

- Will require additional Jail staff due to multi level design
- Limits future growth and expansion for functions: Jail, Sheriff, and Courthouse
- Requires similar costs as Option 1 during construction (18 months)
- Requires same staffing for 911 dispatch during demolition and construction (18 months)
- No benefit to relocating the Sheriff's Department to the new Jail

5. Action Plan - Options

Option 7

Assumptions

- New 52 bed Jail (expandable to 85 beds), Jail Support, Sheriff's Department, and 911 Communication
- Build on open field south of the County HHS Building and inside of the City of Kewaunee
- One story building
- New parking for public and Sheriff/Jail staff
- Building is designed for future expansion of Sheriff / Jail and other County departments

5. Action Plan - Options

Option 7 Site Plan – Building & Parking



5. Action Plan - Options

Option 7

Capital Costs (Bid Summer 2021)

- Construction Cost \$29,529,635
Based on Current Construction Costs
- Other Costs (14.5%) \$4,268,727

Total Project Cost \$33,798,362

Project Cost Range

Low \$32,108,443

High \$35,488,280

5. Action Plan - Options

Option 7

Analysis & Recommendation – Recommendation

- Site allows for single story construction which is less expensive
- Incorporates a design which will maximize operational efficiencies well into the future
- Provide for future expansion for Sheriff / Jail as well as other County functions
- Is more convenient to County staff / close proximity to HHS / other County departments

5. Action Plan - Options

Option 7

Analysis & Recommendation – Recommendation

- Allows for most efficient use of County staffing resources
- Requires transport of inmates between Jail and Courthouse
- Most expensive first cost option / cost far outweighs other long term benefits

5. Action Plan – Summary

Capital Project Costs (Bid Summer 2021)

	<u>Low</u>	<u>High</u>
Option 4*	\$24,769,468	\$27,376,780
Option 5*	\$32,190,158	\$35,578,596
Option 7	\$32,108,443	\$35,488,280

* Does not allow for any future department growth on the Courthouse block.



Staffing

6. Staffing

Options 4 & 5 - Correctional Positions

1 Control Officer 24 hours / 7 days a week

1 Pod Officer 24 / 7

1 Booking Officer 24 / 7

1 Movement Officer 10 / 5, 8 / 2
(Options 4 & 5 only)

6. Staffing

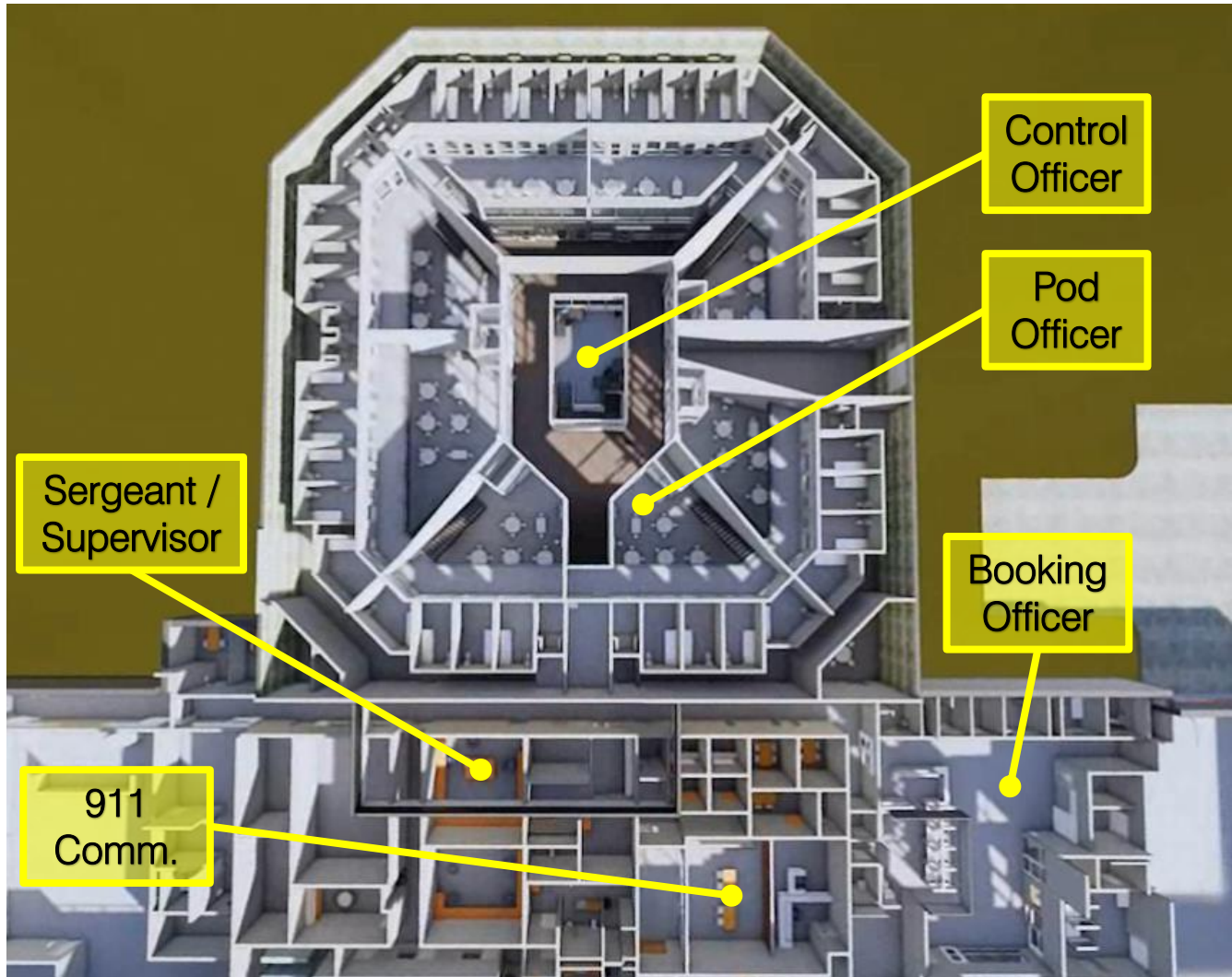
Options 4 & 5 – Correctional Staff Cost (annual)

Legacy Staff (14 Officers)	\$1,209,745
Correctional Officers	\$446,210
• 6 Correctional Officers' Wages and Benefits□ (3 family, 2 single, 1 none)	
Total Annual Budget	\$1,655,955

Note: All budget information was developed with the assistance of the Kewaunee County Finance Director.

6. Staffing

Option 7 - Dallas County (IA) (Example)



6. Staffing

Option 7 - Correctional Positions

1 Control Officer 24 / 7

1 Pod Officer 24 / 7

1 Booking Officer 24 / 7

6. Staffing

Option 7 – Correctional Staff Cost (annual)

Legacy Staff (14 Officers)	\$1,209,745
Correctional Officers	\$254,650
• 4 Correctional Officers' Wages and Benefits	
Wage - \$21.00/Hour	
Benefits - (2 family, 1 single, 1 none)	
Total Annual Budget	\$1,464,395

6. Staffing

Correctional Staff Comparison (annual)

Options 4 & 5

- (20) Correctional Officers

Annual Cost = \$1,655,955

Option 7

- (18) Correctional Officers

Annual Cost = \$1,464,395

Difference (Savings) = \$191,560

6. Staffing

All Options – 911 Positions

- 2 Dispatcher positions 24 / 7
- 1 Supervisor position Varies

6. Staffing

All Options – 911 Staff Costs (annual)

Dispatcher Positions	\$656,300
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- 10 Dispatchers' Wages and Benefits
 - Wage - \$21.00/Hour
 - Benefits - (6 family, 2 single, 1 none)

Correctional Officers	\$82,760
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- 1 Correctional Supervisor's Wage and Benefits
 - Wage - \$25.00/Hour
 - Benefits - (1 family)

Total Annual Budget	\$739,060
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6. Staffing

Options 4 & 5 – All Staff Cost (annual)

Correctional Staff \$1,655,955

911 Staff \$739,060

Total Annual Budget \$2,395,015

Current Budget \$1,528,396

Difference (\$866,619)

Other Staff \$318,651

- Lieutenant
- Courts
- School Liaison

Grand Total Annual Budget \$2,713,666

6. Staffing

Option 7 – All Staff Cost (annual)

Correctional Staff	\$1,464,395
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- 18 Staff

911 Staff	\$739,060
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- 11 Staff

Total Annual Budget	\$2,203,455
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Other Staff	\$318,651
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- Lieutenant
- Courts
- School Liaison

Grand Total Annual Budget	\$2,522,106*
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* Calculated Separately

6. Staffing

Option 7 – All Staff Cost (annual)

Legacy Staff	\$1,209,745
• 14 Staff	
Jail / Dispatcher Staff	\$656,300
• 10 New Staff	
Total Annual Budget	\$1,866,045
Other Staff	\$318,651
• Lieutenant	
• Courts	
• School Liaison	
Grand Total Annual Budget	\$2,184,696*

* Combined

6. Staffing

Staff Comparison (annual)

Options 4 & 5 \$2,713,666

Option 7 - Calculated Separately \$2,522,106

Option 7 - Combined \$2,184,696

Current Budget \$1,528,396

(Option 7 combined - current budget) Difference (\$656,300)

6. Staffing

Outsourcing 911 Dispatch to Another County

Considerations:

- Cost: Staffing + Equipment
- Service: County Familiarity

6. Staffing

Outsourcing 911 Dispatch to Another County

Annual Cost to Keep in Kewaunee County

• Staffing:	\$393,780
• Equipment:	\$63,368
<hr/>	
Total Annual Cost:	\$457,148

Annual Cost to Move to Another County

• Staffing:	\$0
• Equipment:	\$0
<hr/>	
Total Annual Cost:	\$0

Include capital costs for
911 space and
equipment.



Schedule

7. Schedule

Phases / Tasks	2020																					
	April				May				June					July				August				
	6	13	20	27	4	11	18	25	1	8	15	22	29	6	13	20	27	3	10	17	24	31
Committee Meeting No. 3																						
Committee Meeting No. 4																						
Committee Meeting No. 5																						
Spring Election	7																					
County Board (Confirm)							19															

Questions and Answers

