

DIVISION OF RACING EVENTS

Colorado Racing Commission • Department of Revenue



**Report of the Fifty-Second
Pari-mutuel Wagering Season 2000
January 1, 2000 - December 31, 2000**

STATE OF COLORADO

DIVISION OF RACING EVENTS

Department of Revenue

1881 Pierce Street, Suite 108
Lakewood, Colorado 80214-1494
(303) 205-2990
FAX (303) 205-2950



Bill Owens
Governor

Fred Fisher
Executive Director

David Reitz
Division Director

Honorable Bill Owens
Governor of the State of Colorado

Honorable Members of the 66th General Assembly
State of Colorado

Dear Governor Owens and Honorable Members of the House and Senate:

It is with distinct pleasure that we provide you with the following Report of the 52nd pari-mutuel wagering season, pursuant to Section 12-60-302(2), C.R.S. 1985-replacement volume 5. Included within this report are detailed figures and statements covering the 2000 racing calendar year.

We trust that the information proves to be informative and indicative of the benefits that properly regulated pari-mutuel wagering provides to the State of Colorado. The 652 days of racing during 2000, resulted in \$230,824,282 wagered in total with \$6,542,580.07 being deposited in the General Fund of the State of Colorado.

The Department of Revenue is required to report any information that may be related to taxes in aggregate form only. Therefore, we have grouped our data into "greyhound" and "horse" totals. Please note that this report does not intend to reflect profits or losses from any racetrack.

The Division expresses appreciation for the cooperation and service rendered by the Governor, the State Legislature, the Executive director of the Department of Revenue and other public officials, as well as the various track operators, the law enforcement agencies of Colorado, the press and the Division employees.

Respectfully,

FOR THE DIVISION OF RACING EVENTS

A handwritten signature in black ink that reads "David C. Reitz". The signature is written in a cursive style with a large, stylized "R" at the end.

David C. Reitz
DIVISION DIRECTOR

1999 Annual Report

FRED FISHER

Executive Director
Department of Revenue

IRVING S. HOOK

Chair (through 06/30/00)
Colorado Racing Commission

W. GALE DAVEY

Chair (Since 07/01/00)
Colorado Racing Commission

DAVID REITZ

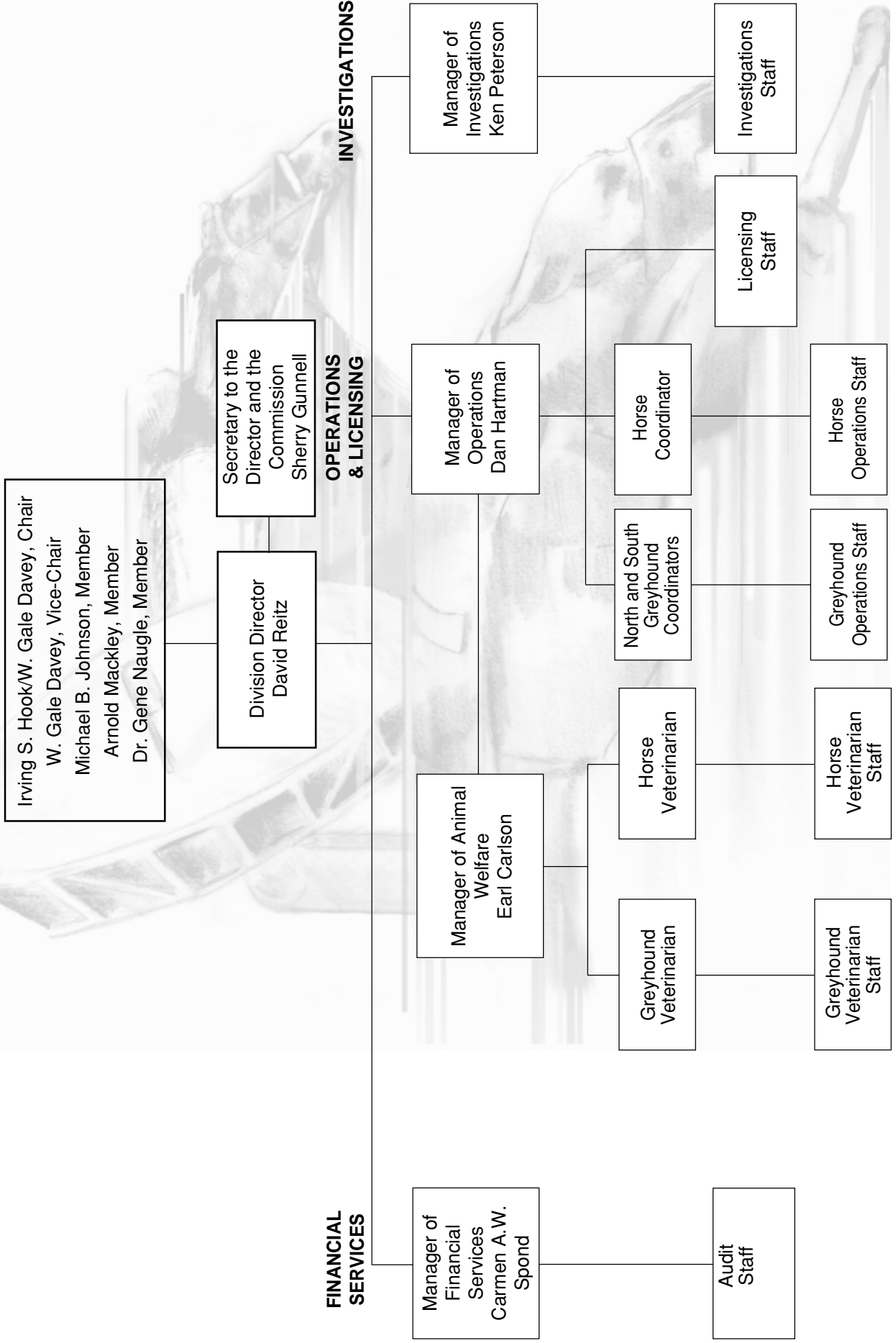
Division Director
Division of Racing Events

Table of Contents

Racing History/Mission Statement	1
2000 Events	2
Continuing Projects	3
Members of the Colorado Racing Commission	4
Licensed Race Tracks	5
Licensed OTB's	6
Cumulative Data	7
Comparative Data	8-9
Approved 2001 Race Dates	10
Horse Owners and Breeders Awards and Supplemental Purse Fund	11
Division Receipts and Disbursements	12
Section Report • Investigations	13
Section Report • Animal Welfare	14
Section Report • Racing Operations & Licensing	15
Section Report • Financial Services	16



COLORADO RACING COMMISSION AND DIVISION OF RACING EVENTS



RACING HISTORY

The Division of Racing Events and the Colorado Racing Commission were established in 1949 to supervise pari-mutuel wagering in Colorado. Pari-mutuel means betting among ourselves. When placing a wager at the track, you are not betting against the "house" as you would be at a casino. Pari-mutuel wagering is a form of betting in which the loser's wagers (less a percentage for the Associations and taxes) are distributed among the winners. The Division is a regulatory, enforcement and revenue-generating agency of State Government. The Colorado Legislature and the Racing Commission set a public policy in the area of racing regulation which is then administered by the Division. The major functions of the Division and the Racing commission are to promote racing and the recreational, entertainment and commercial benefits derived therefrom, to establish high standards of sport and fairplay, to promote the health and safety of the animals involved in racing and to foster honesty and fair dealing in the industry. The Commission allocates race dates to various racing associations, adopts rules and supervises the conduct of race meets, racing officials and licensees. A staff of administrative, security and veterinary professionals, in conjunction with Division racing officials, supervised the daily activities at the seven tracks conducting pari-mutuel racing in Colorado during 2000 (five greyhound tracks and one horse tracks).

The Division was a member of the Association of Racing Commissioners International, Incorporated (ARCI), formerly known as the National Association of State Racing Commissioners (NASRC). The Commissioners and the Division Director are active participants on various national and regional committees. The National Association of State Racing Information Services (NASRIS) allows the Division to monitor the backgrounds of licensees and to exchange important regulatory and industry information with other jurisdictions.

In 2000, fourteen Commission meetings were held. The Commission conducted a 2001 race date hearing, renewal application hearings for north and south circuit greyhound race meets and renewal application hearings for one major horse race meet, conducted numerous disciplinary, administrative, and appeal hearings, held rule-making hearings related to the adoption of various greyhound, horse, pari-mutuel and racing rules and continued its official regulatory, supervisory and enforcement control of pari-mutuel wagering.

MISSION STATEMENT

PROMOTE AND FOSTER THE PUBLIC CONFIDENCE IN THE PARI-MUTUEL INDUSTRY, PROTECT THE WELFARE OF THE PARTICIPANTS THROUGH FAIR, CONSISTENT, PROACTIVE ENFORCEMENT OF APPROPRIATE POLICIES, STATUTES AND COLORADO RACING COMMISSION RULES

Visit us at our website at www.state.co.us/racing_dir/coracing.html



2000 EVENTS

COMMISSION ACTIVITIES:

Commissioners Gene Naugle and Arnold Mackley were confirmed by the Senate during the 2000 legislative session. Commissioner Naugle's term will expire on July 1, 2003.

Commissioner Mackley's term was reappointed to a full four-year term to expire on July 1, 2004, after completing an unexpired term occasioned by the resignation of another Commission member.

Commissioner Irving Hook, who not only served two full four-year terms but one unexpired term on the Colorado racing commission and was the commission Chair for several years, concluded his lengthy term of service as a commission member. We extend our sincere gratitude to Mr. Hook for his length and conscientious service to the citizens of Colorado.

In July, W. Gale Davey was appointed Chairman of the Commission. Commissioner Gene Naugle was appointed to serve as Vice-Chairman. They will hold these positions for one year.

LEGISLATION:

House bill 00-1216, which extended the authority of division personnel to conduct offsite inspections and investigations, was enacted. Senate Bill 00-217 proposed to create a "Class C" race meet, but was postponed indefinitely. Revisions to the purse trust funds were affected by House Bill 00-1301.

NEW SIMULCAST FACILITY

On May 6, 2000, "The Private Reserve", the off-track wagering facility operated by Interstate Kennel Club in Denver, was opened.



CURRENT MEMBERS OF THE COLORADO RACING COMMISSION

Irving S. Hook was the Chair of the Commission through 06/30/00. He is a Denver Attorney and Certified Public Accountant, who also serves as Vice-Chair of the Denver Pension Plan. Mr. Hook's priorities as a member of the Commission have been to ensure fairness for participants in the racing industry, full disclosure to the public and the protection of the safety and welfare of racing animals. As his most notable achievement while serving on the Commission, Mr. Hook cites the revamping of the Commission's rules and regulations.

W. Gale Davey, a member of the commission since 1995 became the chair on 07/01/00. He believes that the Commission's positive impact on pari-mutuel wagering in Colorado, is through maintaining total control over animal welfare, fair play and industry integrity, thus ensuring honesty, safety and protection for the public and the racing participants. He acknowledges a lifelong interest in horses and racing and has been a horse breeder, rider, owner, and trainer. Mr. Davey spent twenty-five years with the Fort Morgan Police Department, nineteen of which were a Chief of Police. Additionally, he served as Sheriff of Morgan County for eight years. As current civic affiliations, Mr. Davey is an appointed member of the Morgan County Community Corrections Board and is Co-President of the Brush, Colorado Rodeo Association. Mr. Davey has been recognized by his peers as a leader in law enforcement, serving as President of the Colorado Association of Chiefs of Police.

Effective November 5, 1999, **Mr. Arnold Mackley** was appointed to the Racing Commission. He is from Rifle and will serve as our representative from the western slope. Mr. Mackley brings over thirty years of experience as an Accountant, Controller, Administrative Assitant, Vice President of Finance and Director of Finance of several large U.S. companies, with offices through the Wesern U.S. and Israel as well as almost ten years of service in prominent government office. He was appointed to the Planning and Zoning Commission of Garfield County, Colorado, where he served for fourteen years before his election and eight year tenure as County Commissioner of Garfield County. Mr Mackley is currently a consultant for Ameralia, Inc., a chemical company which is in the process of permitting and constructiong a mine capable of producing 50,000 tons of product a year.

Michael B. Johnson, a Commission member since 1993, is a Certified Public Accountant in Denver. Mr. Johnson's professional experience is quite varied, ranging from being Senior Accountant with Ernst and Ernst in Boston, to comptroller for Ceres International, to his current role as Chief Executive Officer of Michael B. Johnson and Company, P.C. Michael B. Johnson and Company, P.C. has fulfilled requirements and auditing functions for, among others, the Denver International Airport, Coors' Field Construction, the Piton Foundation and various programs within the Colorado Department of Health and Human Services. Mr. Johnson believes that while serving on the Commission, his primary function is to relate a business aspect to the decision-making process. He emphasizes that the Colorado Racing Commission must be pro-active in responding to problems occurring in the pari-mutuel realm, be strong on animal welfare, and demanding on industry integrity.

On June 9, 1999, **Dr. Gene Naule**, a Veterinarian from Penrose, was appointed to the Colorado Racing Commission. Dr. Naugle has been a Veterinarian in private practice in Colorado Springs since 1967. He is a member of numerous professional organizations, including the American Association of Equine Practitioners and the American and Colorado Springs Area Veterinary Medical Association. He is also a charter member of the Colorado Mule Riders and an honorary lifetime member of the North American Trail Riders Conference. His assorted professional activities include the presidency of the Colorado Springs Area Veterinary Association and the program chairmanship of the State Meeting of the Colorado Veterinary Association.



LICENSED RACETRACKS

GREYHOUND TRACKS

ROCKY MOUNTAIN GREYHOUND PARK

Karen Crouse, General Manager
P. O. Box 7229
Colorado Springs CO 80933
(719) 632-1391

PUEBLO GREYHOUND PARK

Jim Gartland, General Manager
3215 Lake Avenue
P. O. Box 2220
Pueblo CO 81005
(719) 566-0370

MILE HIGH GREYHOUND PARK

Steve Rose, General Manager
6200 Dahlia Street
Commerce City CO 80022
(303) 288-1591

CLOVERLEAF KENNEL CLUB

Joe Pardi, General Manager
P. O. Box 88
Loveland CO 80539
(970) 667-6211

INTERSTATE KENNEL CLUB

Steve Rose, General Manager
6200 Dahlia Street
Commerce City CO 80022
(303) 288-1591

HORSE TRACKS

ARAPAHOE PARK

Jim Gartland, General Manager
26000 East Quincy
P. O. Box 460370
Aurora CO 80016
(303) 690-2400



LICENSED OTB'S

HAVANA PARK

10750 East Iliff Avenue

Aurora CO 80014

(303) 751-5918

Licensee: Mile High Greyhound Park

SOUTHWESTERN EQUINE ASSOCIATION

123 Pine Street

Trinidad CO 81082

(719) 845-0969

Licensee: Cloverleaf Kennel Club

RED AND JERRY'S

1840 West Oxford Avenue

Sheridan CO

(303) 783-0655

Licensee: Rocky Mountain Greyhound Park



CUMULATIVE DATA

Year	Days		Pari-Mutuel Handle	Percent (compared to previous year)		Total Breakage	State Commission	Total Divisional Receipts
1996	843	d	258,295,605	+0.46	a	648,879.80	b&c	7,780,948.63
1997	860	d	251,868,450	-2.49	a	658,845.25	b&c	7,251,801.88
1998	f 667	d	235,104,817	-6.66	e	629,328.78		6,726,190.36
1999	f 652	d	244,568,401	+4.03	e	668,240.51		6,592,394.72
2000	581	d	230,824,282	-5.62	e	632,996.62		6,010,730.63

Footnotes

- a Breakage retained by racing association in accordance with Colorado Supreme Court decision after June 21, 1954. Half of breakage from live horse meets to horse purses. (SB91-99 Effective June 6, 1991.)
- b State and track greyhound commissions changed to 17.5%; and 0.75% for State horse commissions. (SB91-99 effective June 6, 1991.)
- c State and track greyhound commissions restored to 17.5% effective July 01, 1994. (HB93-1268.)
- d Includes handle wagered from out-of-state sources on in-state races.
- e Effective 07/01/98, the association share increased from 13% to 15%.
- f In previous years, both live and simulcast races were included in this calculation. However, starting in 1998 only live races are included.

NOTE The primary reasons for the substantial growth in pari-mutuel handle between 1995 and 1996 are 1) and increase in the number of out-of-state races accepted in Colorado; and 2) and increase in the number of out-of-state simulcast facilities wagering on races in Colorado. However the State does not collect pari-mutuel commission on wagers made outside of Colorado. Consequently, the percentage increase seen in the pari-mutuel handle is not duplicated in the State commission increase for this same period.



2000 RACING SEASON - COMPARATIVE DATA

NOTE: In previous years, both live and simulcast races were included in this calculation. However, starting in 1998, only live races are included.

	# of Live Race Days	# of Races	Pari- Mutuel Handle*	State Revenue	City Revenue	Tracks' Revenue	Owners/ Breeders Fund
HORSE TOTALS **	37	16,011	\$75,256,831	\$560,437.92	NA	\$13,585,921.59	\$910,185.83
GREYHOUND TOTALS	544	10,697	\$155,567,451	\$5,384,306.53	\$544,331.69	\$25,177,592.40	NA
GRAND TOTAL	581	26,708	\$230,824,282	\$5,944,744.45	\$544,331.69	\$38,763,513.99	\$910,185.83

* Includes off-track-betting (OTB) and out-of-state figures.

** Includes simulcast days.



CSU Fund	Breakage	Distributed to Public	Average Daily Handle	Percent Average Daily Handle (compared to previous year)
\$134,140.55	\$367,951.26	\$58,243,774.92	\$2,033,968.41	+15.65%
NA	\$265,045.36	\$124,200,784.99	\$285,969.53	(+3.09%)
\$134,140.55	\$632,996.62	\$182,444,559.91		



2001 APPROVED RACE DATES

GREYHOUND

SOUTHERN CIRCUIT:

PUEBLO KENNEL ASSOCIATION (Pueblo)	JANUARY 3 – APRIL 1, 2001 (Wednesday) (Sunday) (Envelope of 89 days)
ROCKY MOUNTAIN GREYHOUND PARK (Colorado Springs)	APRIL 4 – SEPTEMBER 30, 2001 (Wednesday) (Sunday) (Envelope of 180 days)
RED & JERRY'S LLC (Colorado Springs)	OCTOBER 2 – DECEMBER 24, 2001* (Tuesday) (Monday) (Envelope of 84 days)
	DECEMBER 26 - DECEMBER 31, 2001 (Wednesday) (Monday) (Envelope of 6 days)

NORTHERN CIRCUIT:

INTERSTATE KENNEL CLUB (Commerce City)	JANUARY 1 – FEBRUARY 3, 2001 (Monday) (Saturday) (Envelope of 34 days)
CLOVERLEAF KENNEL CLUB (Loveland)	FEBRUARY 6 – JUNE 5, 2001 (Tuesday) (Tuesday) (Envelope of 120 days)
MILE HIGH GREYHOUND PARK (Commerce City)	JUNE 8 – OCTOBER 5, 2001 (Friday) (Friday) (Envelope of 120 days)
INTERSTATE KENNEL CLUB (Commerce City)	OCTOBER 6 – DECEMBER 24, 2001* (Saturday) (Monday) (Envelope of 80 days)
	DECEMBER 26 – DECEMBER 31, 2001 (Wednesday) (Monday) (Envelope of 6 days)

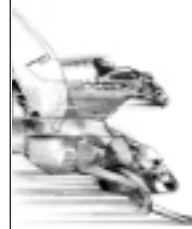
* - No racing on December 25 due to Christmas holiday

HORSE

ARAPAHOE PARK (Unincorporated Arapahoe County)	MAY 26 – SEPTEMBER 3, 2001** (Saturday) (Sunday) (Envelope of 101 days)
---	---

Please note all race meet applications are conditioned upon meeting statutory and regulatory conditions before approval will be granted by the Racing Commission.

**TENTATIVE - Actual race dates to be determined, but no later than January 15, 2001



HORSE BREEDERS AND OWNERS AWARDS AND SUPPLEMENTAL PURSE FUND

12-60-704, C.R.S. as amended, June 6, 1993 provides for the horse Breeders and Owners Awards and Supplemental Purse Fund program. The fund consists of 1/2 of 1% of the mutuel handle on win, place and show wagers and 1 1/2% of the mutuel handle on all other wagers from all horse meets including simulcast programs, plus uncashed ticket money from previous years.

For calendar year 2000, accumulated funds came from the following sources:

Funds earned from wagering in 2000	\$ 922,057.83
Uncashed tickets from prior year's meets	315,076.25
<hr/>	
TOTAL	\$ 1,237,134.08

Following is the approved Owners and Breeders Awards and Supplemental Purse Funds distribution amounts for calendar year 1999:

Quarterhorse	\$ 245,694.90
Thoroughbreds	852,433.74
Appaloosa	2,854.66
Arabian	32,180.36
Paint	3,970.42
<hr/>	
TOTAL	\$ 1,137,134.08

Due to the Fund's fiscal year end of December 31, actual distribution of most of these funds from 2000 took place in 2001. However, during 2000 the Colorado Racing Commission approved an advance of funds to the Colorado Thoroughbred Breeders Association of \$100,000.00. The distribution amounts above reflect these advances.



DIVISION RECEIPTS AND DISBURSEMENTS:

RECEIPTS:

State Commission on Pari-Mutuel Handle:

Horse	\$	560,437.92
Greyhound		<u>5,384,306.53</u>
Total Commission	\$	6,542,580.07

Occupational Licenses:

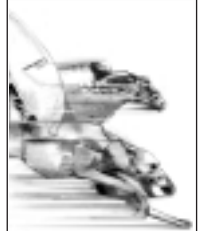
	# Issued	\$	Received
Horse	783	\$	18,437.50
Greyhound	998		20,839.00
Central	<u>203</u>		<u>5,325.50</u>
Total Licenses	1,984	\$	44,602.00

Lease Registration Fees Collected	\$	80.00
Fines and Penalties Collected		19,600.00
Investigation Fees Collected		1,696.68
Printing Fees Collected		<u>7.50</u>
TOTAL RECEIPTS	\$	28,384.18

DISBURSEMENTS:

Personal Services	\$	1,763,959.19
Operating Expenses		157,149.03
Laboratory Services		283,175.00
Legal Services		<u>27,394.29</u>
TOTAL DISBURSEMENTS	\$	2,231,677.51

NOTE: We have modified this report. Therefore, the reporting categories (and net balance) should not be compared to previous years.



SECTION REPORT • INVESTIGATIONS SECTION

During 2000, the Investigations Section completed 416 case investigations and 18 license background investigations. Of the 416 case investigations, 206 were criminal investigations. They resulted in 33 arrests and criminal charges being filed. Additionally, 210 administrative investigations and 148 license background investigations were conducted. These resulted in 247 actions being taken via an administrative summons, administrative hearing, or written warning for racing violations.

The Section also conducted inspections of the horse stables, greyhound kennels, and off-track wagering (OTB) facilities. Eighty-six hours stable inspections are performed with nine violations being detected. One hundred four kennel inspections were conducted throughout the year from which five violations are noted.

In order to facilitate the management of the Section's investigative cases and inspections, the Section acquired two new computer programs that track, manage, and data-mine investigative and inspection information for the Division. These programs were installed and are currently in use.

With the assistance of Enforcement Information Technology section, a system was designed to assist investigators in tracking every inspection. The system includes a computer-based report writing program. It allows the supervisory and investigative staffs to access and maintain complete reports on all inspections that were conducted. This tracking system has eliminated duplicative inspections and has allowed for improved data information retrieval on inspections. It has proved to be every valuable asset.

A new case management system was tested and implemented this year. As with our previous system, the new system electronically assigns case numbers for both the licensing and investigative cases. However, the new system tracks each case and the persons associated with the case of license issued. The transfer of data from the former system was completed with only minor problems. The new system affords very efficient and expeditious data retrieval and case tracking. It was implemented on December 14, 2000 with upgrading to continue into the New Year.

The Section strives to maintain an excellent working relationship with local, state and federal law enforcement agencies. Also, the Section continues to meet and work with other racing jurisdictions across the country to insure honesty and integrity in racing.



SECTION REPORT • ANIMAL WELFARE SECTION

The Animal Welfare Section has been charged with the responsibility of protecting the health and safety of greyhounds and horses racing in Colorado. To do this, several approaches are used, consisting of multiple inspections of animals, a preventative health maintenance program, research, a drug testing program, and an injury tracking system.

Animal Welfare Section staff members observe all animals several times prior to racing and examine any animal that performs poorly, appears to be injured, or is injured. Emergency care is also provided at each track with more intensive care available from area clinics when necessary.

Staff members maintain individual health records on all animals, indicating vaccination status, medications used and all other information. Staff members also conduct research relating to health and safety issues. The latest project completed was a study on the effects of testosterone on racing greyhounds. The injury tracking system developed in Colorado is still being used, in some form or another, by several other racing jurisdictions. An extensive updated report on the injury tracking system, including the last seven years, and involving additional statistical evaluations will be provided to the commission in early 2001. The results of the project are to be presented at the 2001 Canine Sports Medicine Symposium

To monitor drug administration to greyhounds and horses, the Division maintains a comprehensive drug testing program that is overseen by the animal welfare section. For greyhounds this program involves the pre-race and/or post-race selection of samples, which is based on the percentages between total starts and total samples collected. Where as the samples collected from horses are taken post-race, from all winners, with additional samples from other selected horses, as needed.

An important aspect of the Animal Welfare Section continues to be the injury tracking system which tracks 27 variables. This insures that racing animal injuries are closely monitored to determine how and why they occur.



SECTION REPORT • RACING OPERATIONS & LICENSING SECTION

In 2000, the Licensing and Racing Operations Section focused upon continuing to provide outstanding customer service and streamlining its overall operations. The Section has evaluated its performance and responsiveness to the public's needs and has made every effort to meet them expeditiously and economically. Equipment upgrades and enhancements have enabled our staff to work very efficiently despite personnel reductions. A significant result of this streamlining is the retention of license fee at the 2000 level into 2001.

This has been the first year that all racing operations, including animal safety and welfare and all veterinary assignments, have been centralized under the Racing Operations Section. This has also proved to be a very effective and successful approach and the Section is pleased with the adaptability of the staff and the positive response of the industry to the modified organizational structure. As always, animal safety and welfare issues and concerns have continued to be of paramount importance to the Racing Commission, Division and the Racing Operations Section. The Section is constantly striving to address these crucial matters in a reasonable, caring and conscientious manner.

The Racing Operations and Licensing Section looks forward with optimism to continuing to meet its high standard of performance.



SECTION REPORT • FINANCIAL SERVICES SECTION

In order to determine compliance with statutory requirements, Financial Services staff conduct audits and calculate pari-mutuel taxes due and paid, minimum purse amounts, payments to and proposed distribution amounts from the Horse Breeders' and Owners' Awards and Supplemental Purse fund, payments to the School of Veterinary medicine at Colorado State University, uncashed ticket monies reverting to the Breeders and Owners fund and racing associations, pre-meet tests, price tests, and revenue audits. Staff reviews the pari-mutuel rule sections and develop policies and procedures as needed. They also investigate incidents within the mutual department to determine if taxation, payouts, an/or totalisator aspects have been affected and reviews all financial statements used in the decision of licensure of Associations. Financial Services staff also keep statistical information regarding all wagering in the state.

Effective 07/31/98, all totalisator companies, in order to be licensed within the State, are required to fully comply with Colorado's Totalisator Standards. Colorado is the first state in the nation to develop and implement a set of standards of this type. A copy of these standards can be reviewed on the Division's homepage, under the Financial Services Section.

During 2000, 80 compliance audits were completed. Of these, 6.25% of the audits concluded that adjustment or corrections were required. These audits resulted in penalty and interest assessments in the addition to the collection of underpaid fees and uncashed ticket money.

In the same period, staff conducted or oversaw sixty tests of the totalisator systems and totalisator communications, of which 11.67% of the tests required further follow-up of software reprogramming. The Financial Services Section also responded to requests from the racing association regarding mutual department operations and wagering.

The Financial Services Section also reviewed mutual department and totalisator incidents during 2000. These incidents varied from simple reports of loss of video or data communications of software or hardware failures to violations of rules. In some cases, they computed that the wagering public had not received the correct payout and in some cases, they computed that the wagering public had not received the correct payout. In these cases, the Financial Services Section monitors the totalisator to ensure that this shortage is added to the appropriate pool.

Financial Services staff achieved Certified Fraud Examiner statue completed Supervisory Training at Revenue (STAR), attended the North American Pari Mutual Auditors Conference, completed training by the National White Collar Crime center regarding the internet, and received credit for successful completion of CFE White paper work. They, in conjunction with Internal Revenue Service Representatives, conducted Tax Reporting and Withholding Training at six locations throughout the state, resulting in the training of 100 Association and Division staff.

