



The World Bank Office of

SUSPENSION AND DEBARMENT

10-Year Update on Case Data & Metrics

2007–2017

ADDENDUM TO THE SECOND EDITION

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CASE DATA

When the Office of Suspension and Debarment (OSD) was created, its terms of reference expressly called for the creation of a data management system. OSD has gathered statistics since receiving its first case.

OSD tracks a variety of indicators that provide insight into the workings of the sanctions system beyond the basic input and output measures of caseload, suspensions and debarments.¹ The World Bank's investigative and sanctions processes are well suited for tracking and measuring, given the specific milestones required. In many circumstances there are prescribed time limits for how long each step can take – for example, subject to any extension or stay of proceedings, Respondents have 90 days to appeal to the Sanctions Board by submitting a Response.

Tracking all steps from beginning to end allows OSD and others involved in the investigative and sanctions processes to monitor trends. This information in turn provides the World Bank with opportunities to direct its resources efficiently and effectively.

The following series of charts provides a glimpse into the OSD case review process from a number of angles, and also provides information about the performance of the World Bank's suspension and debarment system in general. Unless otherwise noted, all charts cover the period from OSD's inception through June 30, 2017 (the end of the Bank's Fiscal Year 2017). The case tracking data shown here reveals no detail about individual cases beyond generic identifiers such as case numbers and milestone dates.

1. INT's annual reports, which are available at www.worldbank.org/integrity, reflect INT's tabulation of data relating to its investigative work.



OSD DASHBOARD

This “all in one” dashboard with overall OSD caseload management statistics is used by the World Bank Suspension and Debarment Officer (the SDO) and shared with senior managers who need a snapshot of activity in the sanctions system, both on a current basis and in comparison to historical activity. The dashboard shows, on a quarterly basis, all key case activity since OSD’s inception, including the number of cases and settlements submitted by INT, the number of suspensions imposed by OSD, and the number of final sanctions imposed by OSD and the World Bank Group Sanctions Board (the Sactions Board). For each such measure, there is a further breakdown showing the status of active cases (for example, how many cases are with OSD for review, or how many issued cases are with Respondents pending their decisions to appeal).

FY07-11 FY12 FY13 FY14 FY15 FY16 FY17

OSD Caseload

Sanctions Cases	FY07-11					FY12				FY13				FY14				FY15				FY16				FY17				Total						
	Total	Total	Total	Total	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4		Total	Q1	Q2	Q3	Q4	Total
Sanctions Cases Submitted to OSD by INT	2	3	39	43	27	1	5	9	10	25	10	6	7	10	33	7	11	13	13	44	9	7	10	9	35	9	12	13	10	44	3	4	9	9	25	320
OSD Initial Review Completed	0	5	15	44	40	7	4	4	7	22	9	8	5	9	31	5	13	12	14	44	8	12	9	9	38	15	6	9	14	44	5	4	7	5	21	304
Sanctions Cases Issued by OSD to Respondents	0	3	10	29	33	12	9	1	11	33	9	5	6	5	25	5	11	14	15	45	11	10	10	8	39	13	11	5	11	40	6	4	5	3	18	275
Settlement Agreements																																				
Settlement Agreements Submitted to OSD by INT	-	-	-	-	11	1	9	4	2	16	0	4	1	3	8	4	0	1	1	6	1	1	3	6	11	3	0	10	5	18	1	6	7	12	26	96
OSD Review Completed	-	-	-	-	10	2	9	4	1	16	1	2	3	3	9	4	0	1	1	6	1	1	3	6	11	3	0	3	12	18	1	6	7	8	22	92

Sanctions Results

Firms and Individuals Temporarily Suspended by OSD	0	2	32	51	55	18	17	1	22	58	20	9	5	7	41	10	11	27	18	66	18	14	10	12	54	14	14	5	15	48	7	7	1	5	20	427
Firms and Individuals Debarred or Otherwise Sanctioned	0	2	13	45	38	22	29	17	15	83	9	19	10	9	47	11	9	20	31	71	17	16	15	25	73	15	5	15	24	59	13	16	14	15	58	489

320 Sanctions Cases Submitted by INT

291	have been “regular” sanctions cases
29	have been early temporary suspension cases
26	have been withdrawn by INT/closed by OSD prior to issuance
2	have been settled prior to OSD initial review
11	are with OSD for initial review
6	are with INT for revisions
0	are with OSD for supplemental review
275	have been issued to respondents

275 Cases Issued by OSD

1	involves ongoing early temporary suspensions
5	are with the respondents
11	are on appeal before the Sanctions Board
21	have been early temporary suspension cases superseded by an SAE
237	have been totally completed

Percentage of Issued Cases Resolved at OSD Level

66%	have been resolved at OSD level
34%	have been appealed to the Sanctions Board

427 Firms/Individuals Temporarily Suspended

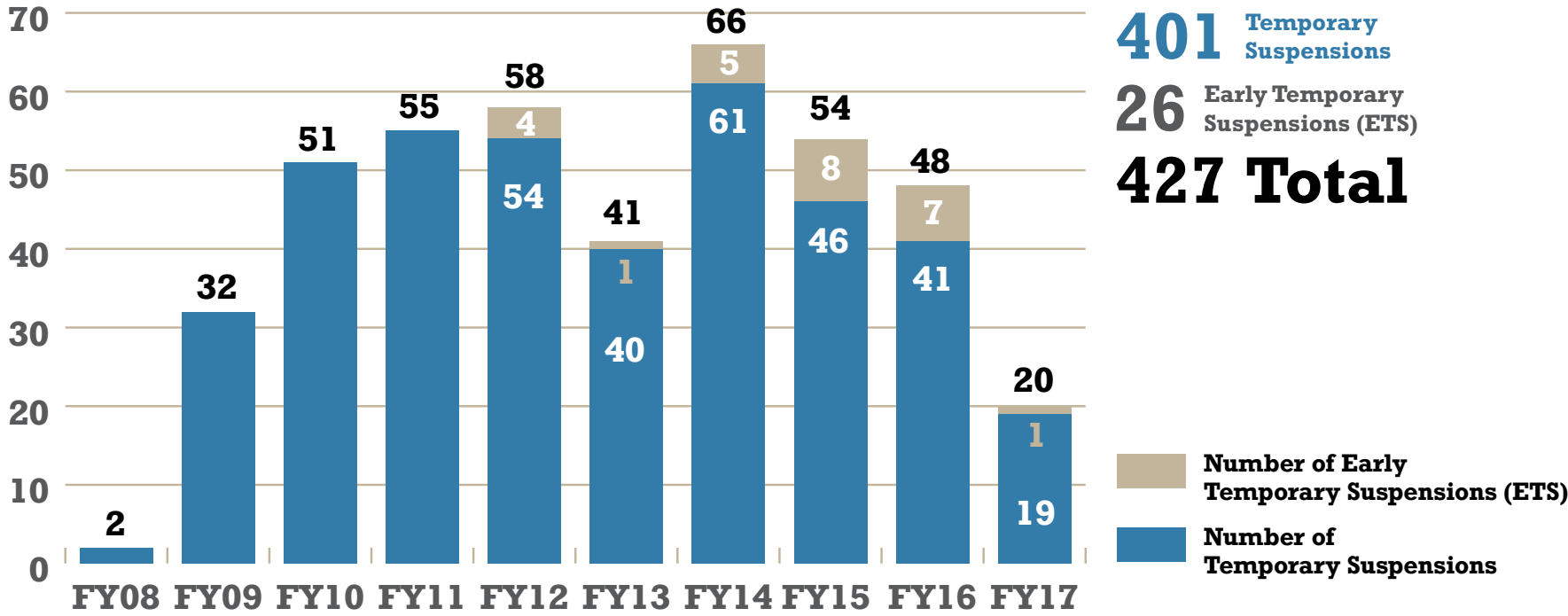
368	have been sanctioned by OSD/the Sanctions Board
8	have been sanctioned pursuant to a settlement agreement with INT after the temporary suspension
18	have not been found liable by the Sanctions Board
27	remain under temporary suspension
5	have been released following withdrawal of Notice
1	has been released following revision of recommended sanction

489 Firms/Individuals Debarred or Otherwise Sanctioned

381	have been sanctioned pursuant to OSD/Sanctions Board decisions
108	have been sanctioned pursuant to settlement agreements

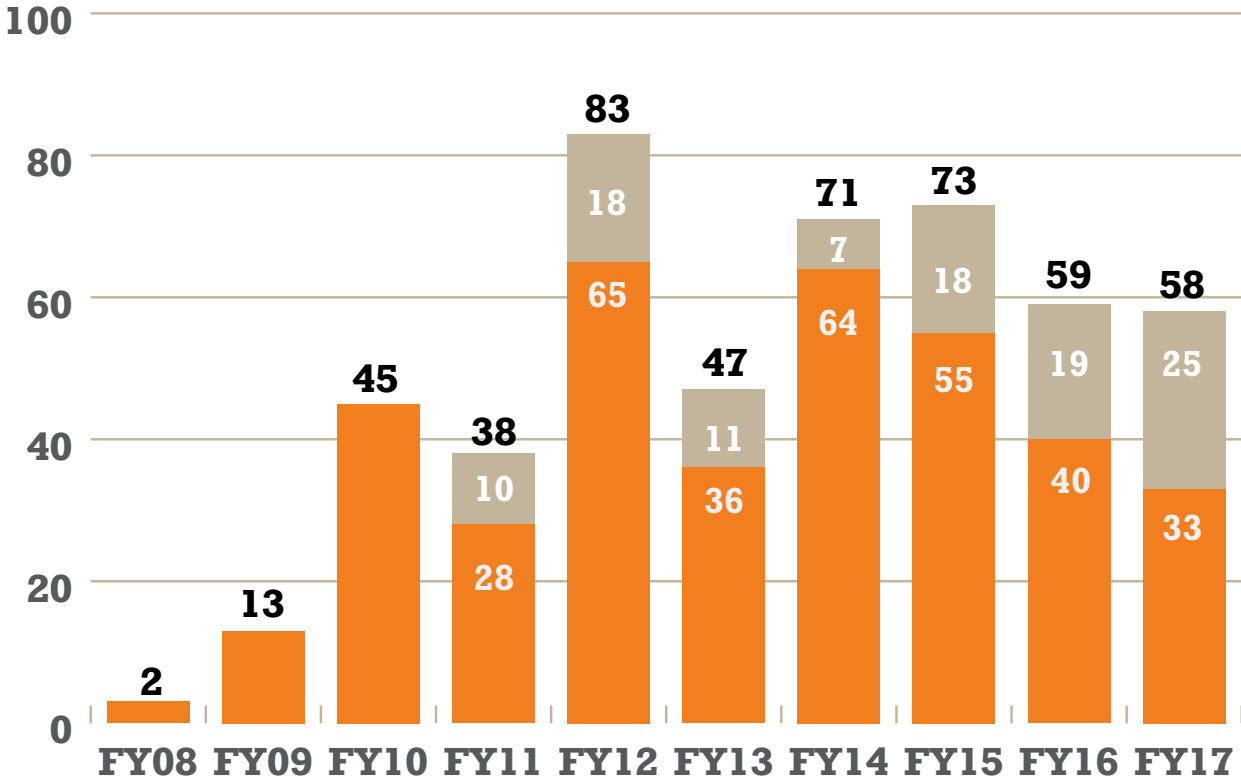
NUMBER OF FIRMS/INDIVIDUALS TEMPORARILY SUSPENDED BY OSD

Since its inception, OSD has imposed temporary suspensions on 427 firms and individuals. This chart shows the total by fiscal year and highlights the proportion of those temporary suspensions that were imposed pursuant to the “early temporary suspension” (ETS) procedure.



NUMBER OF DEBARMENTS AND OTHER SANCTIONS IMPOSED ON FIRMS/INDIVIDUALS

The World Bank has imposed 489 debarments and other sanctions on firms and individuals since the creation of the two-tier sanctions system. This chart shows the total number of sanctions imposed by fiscal year and highlights the proportion of sanctions that were imposed pursuant to settlement agreements, as opposed to sanctions proceedings.



489

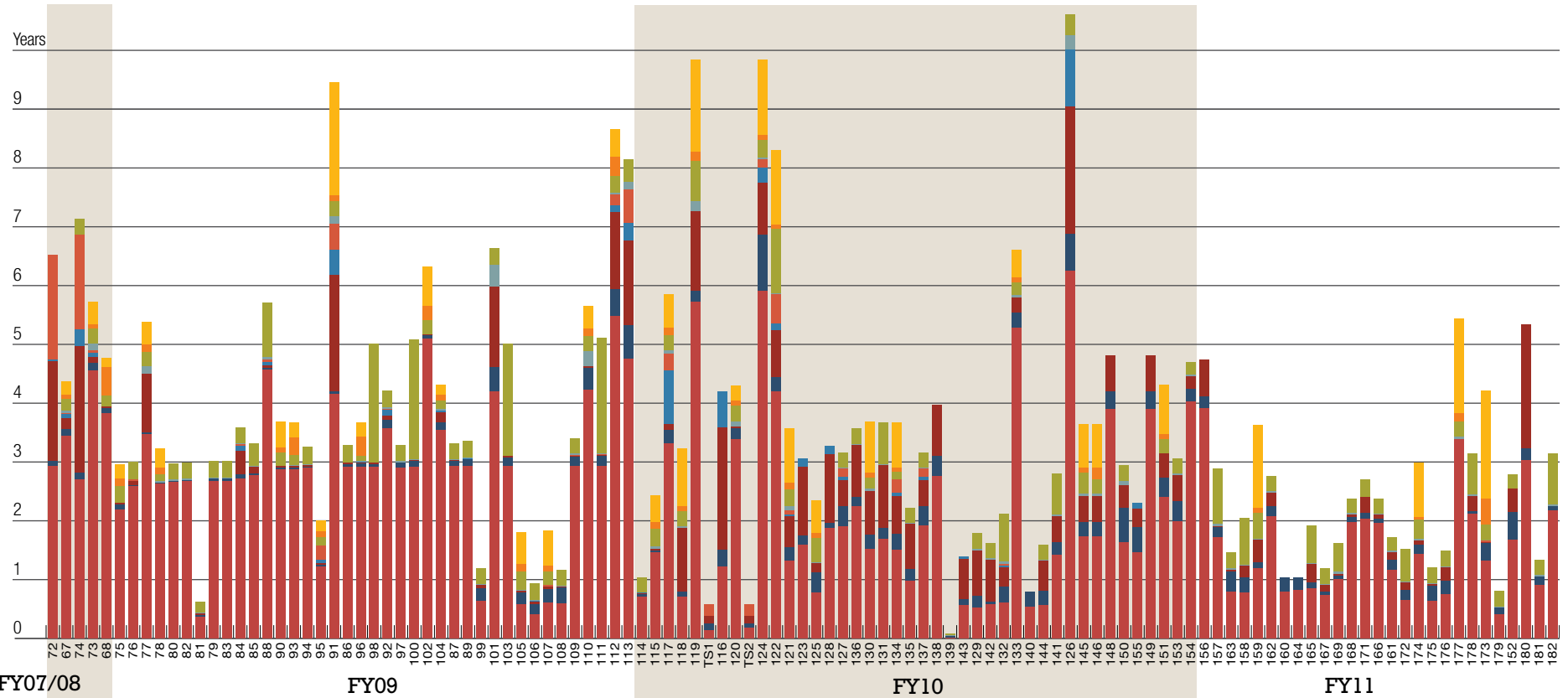
Sanctions Imposed by the World Bank Since Creation of Two-Tier Sanctions System

This chart does not include (i) cross-debarments from other MDBs or (ii) affiliates of sanctioned firms falling within the scope of such firms' sanctions.

- Pursuant to Settlement Agreements
- Pursuant to Sanctions Proceedings

DURATION OF CASES THROUGH FINAL SANCTIONS DECISION

A common question posed to OSD is “how long does a sanctions case take?” This chart shows all sanctions cases (excluding settlements) that have been submitted to OSD since its inception. The chart measures the time taken up in the investigative phase and in each phase of the sanctions process through final resolution. It should be noted that some cases, particularly those submitted in FY16 and FY17, are still active, and therefore the timelines for these cases are not complete, potentially skewing the overall picture to a small degree.



The colors correspond to the various actors in the sanctions process:

Red and **orange** lines indicate INT activity. The first portion of each line, in red, represents the period between the earliest date on which it can be established, based on the INT file submitted to OSD, that INT was aware of allegations (case may have been opened earlier) and the date of submission of

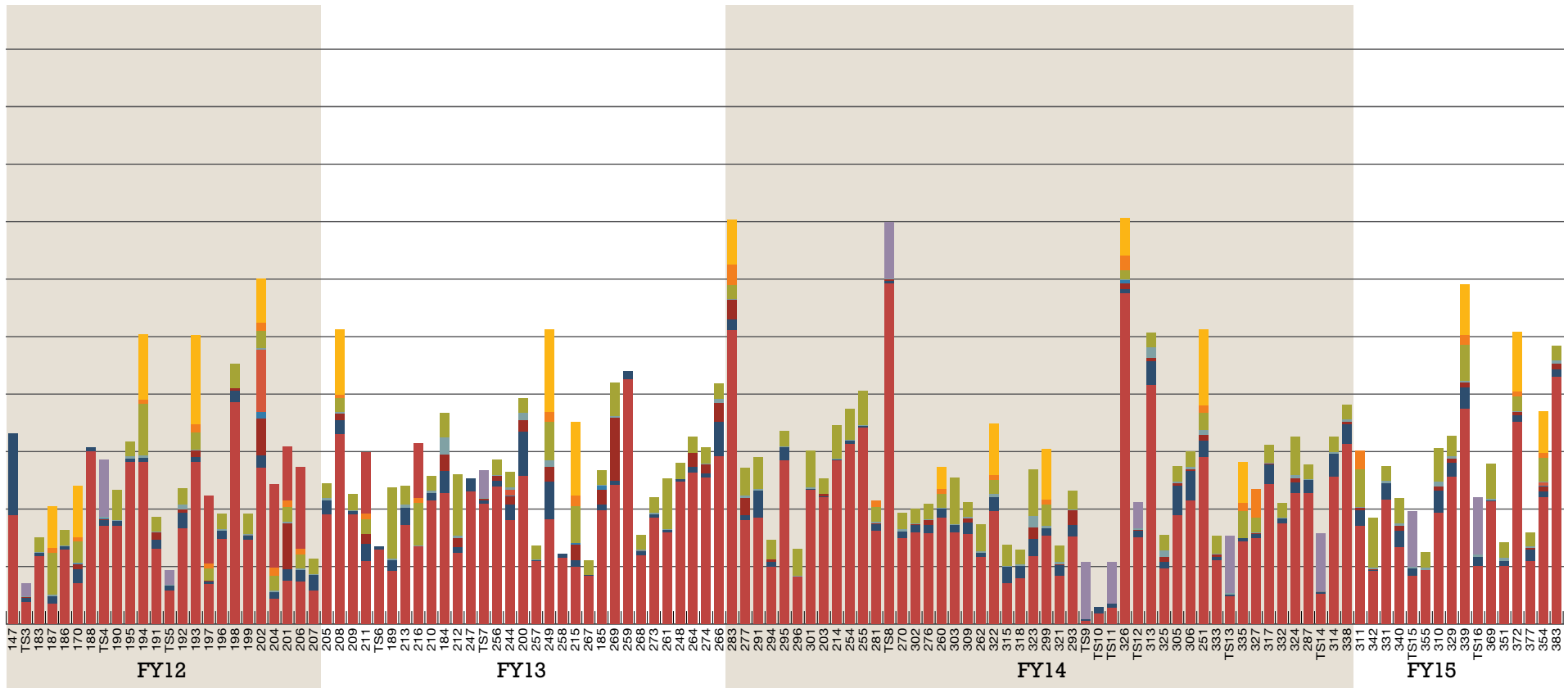
the case to OSD. Subsequent red portions reflect the period in which a case is, if necessary, back with INT for revision, following an OSD determination on the evidence. In cases that are appealed to the Sanctions Board, the orange portion reflects the period (30 days, subject to extension) during which INT may submit a “Reply” to the Respondent’s appeal.

Blue lines indicate OSD activity. For example, the first blue portion of each line represents the amount of time that a case remains with OSD for initial determination. Subsequent blue portions reflect either (i) supplemental review periods, where INT has resubmitted a case after making revisions in response to OSD’s initial determination, or (ii) the period in which OSD prepares a case for issuance to the Respondents.

Green lines indicate the amount of time that a case is with the Respondent, pending the Respondent’s decision whether or not to appeal the case to the Sanctions Board. If the Respondent does not appeal, the final portion of the line for that case is green.

Yellow lines reflect the period for additional submissions, any hearing and Sanctions Board review for appealed cases.

While this data gives a useful overview of the activity in the sanctions system and the typical life cycle of sanctions cases, it must be noted that many factors can have an impact on the timeline of a particular case, such as the complexity of the matters involved, stays for unsuccessful settlement negotiations during investigations, the need to obtain legal and procurement policy advice on case-specific matters, extensions to submission deadlines and additional submissions requested by the parties.



Notes:

1. All data as of June 30, 2017. Includes all submitted cases (SAEs and RTSSs), and as such averages may be skewed slightly downward because of cases that are pending in each stage (e.g., as of June 30, 2017, Case No. 478 had been with OSD for initial review for 23 days, but the initial review remained pending, such that the final number of days for this stage can be expected to be greater than the 23 currently shown as of June 30, 2017).

2. In cases with multiple respondents, the date given for (i) delivery of Notice, (ii) receipt of Response, (iii) date of extension and/or (iv) uncontested determination is the latest applicable date (e.g., if the Notice is delivered on three different dates to the three respondents in a case, the latest date is used).

3. Four cases (Case Nos. 98, 100, 103 and 111) that were initially issued between July and September 2009 were reissued under the new Sanctions Procedures in March

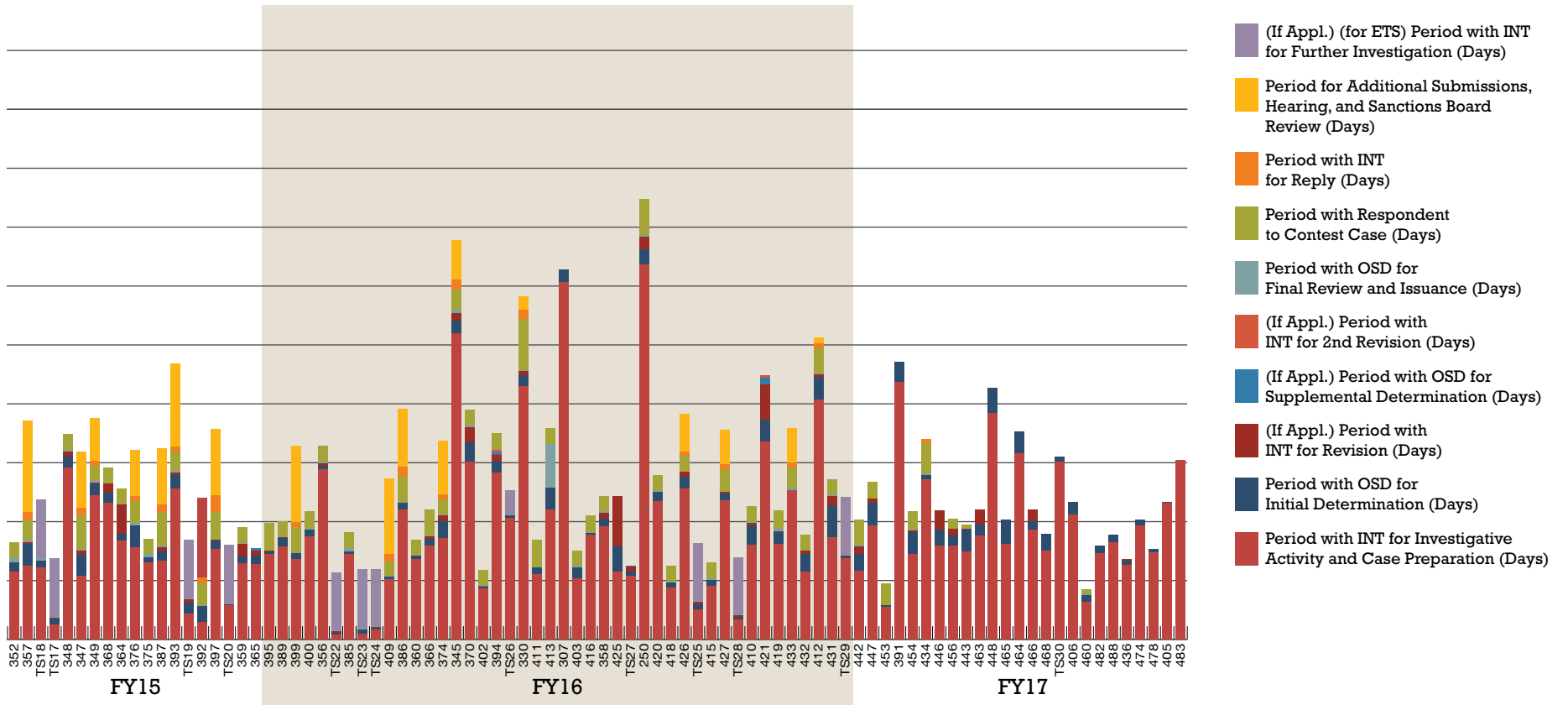
2011 to permit constructive delivery. Since it relates to a delay in delivery, the intervening time has been attributed to the respondents, as have delivery delays under the new Sanctions Procedures.

4. For uncontested cases for which the Notice was issued to the Respondent on or after September 15, 2010, OSD issued a determination reflecting the imposition of the sanction recommended by the SDO in the Notice. For uncontested cases for which the Notice was issued prior to such date, the

Sanctions Board issued a determination imposing the SDO's recommended sanction.

See the sanctions system website (www.worldbank.org/sanctions) for updated information and copies of recent Sanctions Board decisions and SDO determinations.

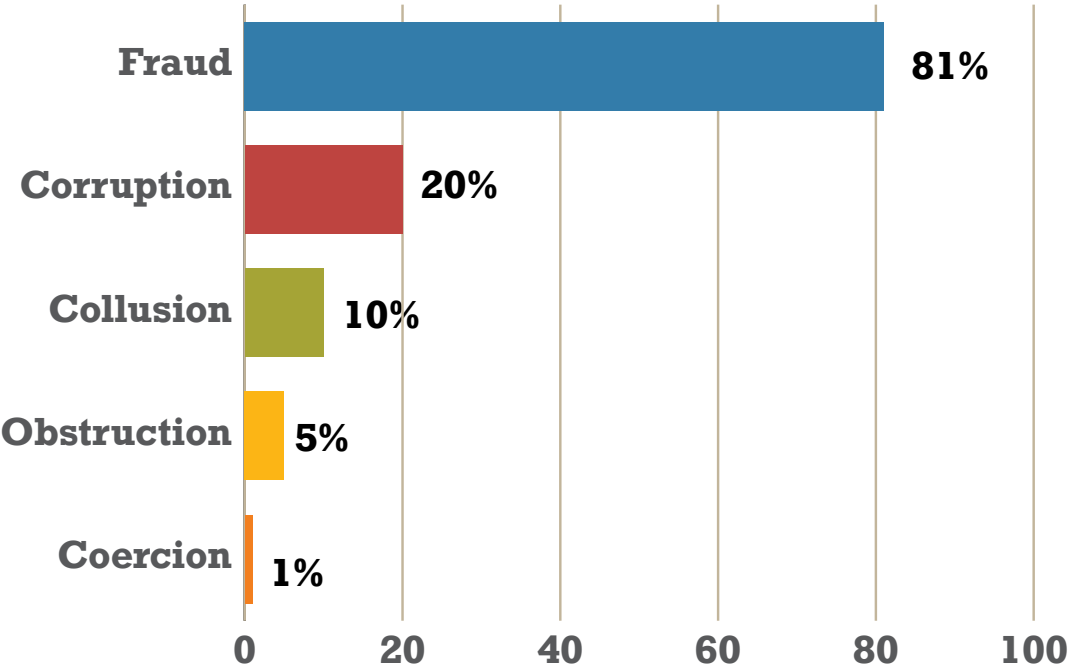
See Annex A for Detailed Breakdown of Duration of Cases





TYOLOGY: PERCENTAGE OF CASES/SETTLEMENTS RECEIVED BY TYPE OF SANCTIONABLE PRACTICE

This chart shows what percentage of the cases and settlements received by OSD since its inception have involved claims of each type of sanctionable practice: fraudulent practice, corrupt practice, collusive practice, obstructive practice and coercive practice. The total of the percentages exceeds 100% because a number of cases have involved claims of more than one type of sanctionable practice (for example, payment of a bribe (corrupt practice) and the submission of false documents (fraudulent practice)). For a further breakdown of the types of fraudulent practice claims, see Typology: Breakdown of Fraudulent Practice Claims.



TYOLOGY: BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS

This detailed breakdown shows the different types of fraudulent practice claims that have appeared in sanctions cases received from INT. First, a distinction is made between fraud cases that involve the forgery of third-party documents and those that involve other types of fraud. Then, within each of these two streams, a further categorization is done to reflect the specific type of forgery or other fraud. For example, within the forgery stream, common instances are fraudulent bid securities, performance certificates and manufacturer's authorizations. Within the other stream, common instances are misrepresentations of experience, over-invoicing and failure to make required disclosures of conflicts of interest. The totals at the bottom of each column show how often INT has sent each type of claim to OSD for decision-making.

Total No. of Cases	Case Type	Fraud									Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud								
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance	Other Fraud				
320	SAEs and RTSs	44	29	57	18	26	41	46	18	53	34	69	19	2
96	Settlements	2	3	7	5	20	21	18	12	20	9	14	0	0
Total Number of Instances		46	32	64	23	46	62	64	30	73				
Total Number of Forgery Cases vs. Other Fraud Cases		163				219								
Total Number of Cases by Type of Sanctionable Practice		339									43	83	19	2
Cases with more than 1 type of misconduct						59								

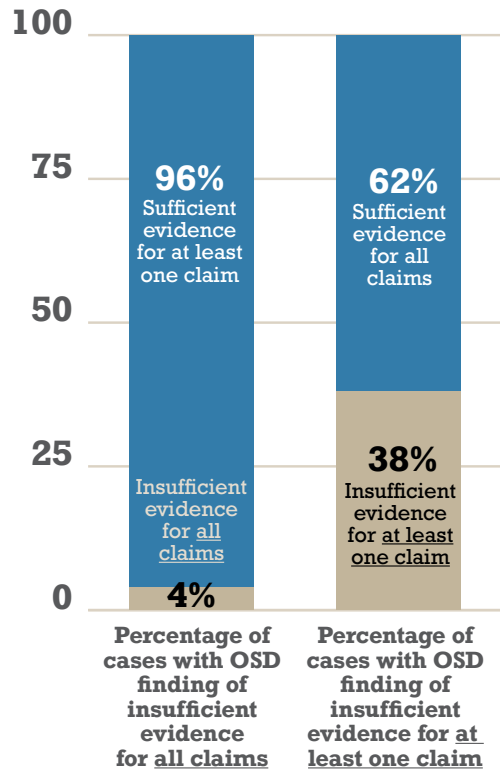
See Annex B for Detailed Breakdown of All Fraudulent Practice Claims

OSD DETERMINATIONS BY CASE

In 96% of the cases that OSD has reviewed to date, OSD determined that there was sufficient evidence to support at least one of the claims made by INT.

In 38% of the cases reviewed, OSD determined that there was insufficient evidence to support one or more of the claims made by INT, resulting in the referral of the case back to INT for revision:

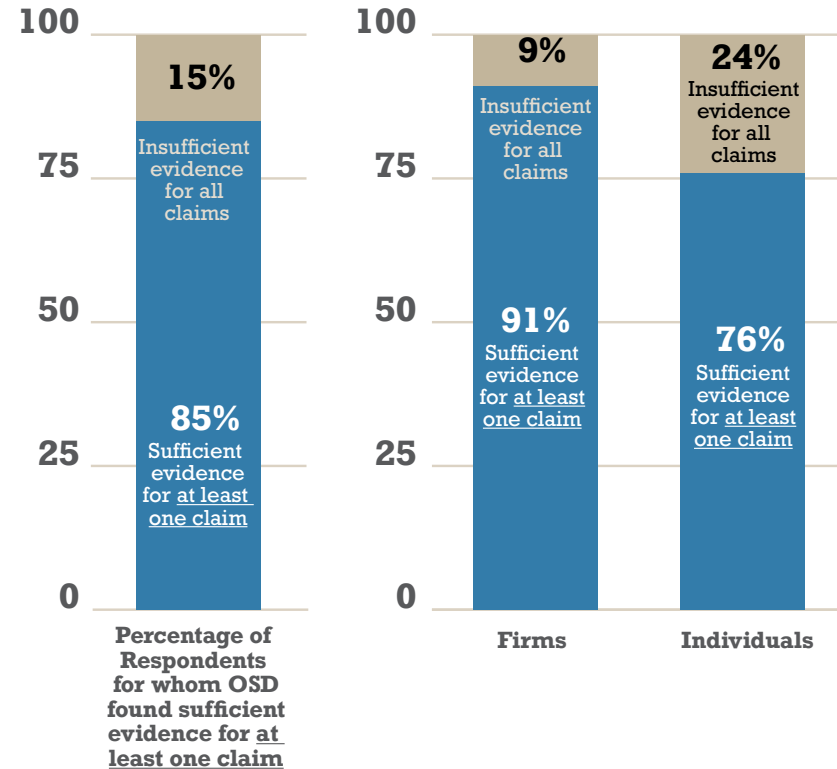
- In a slight majority of such cases, OSD found that there was insufficient evidence for all claims against one or more of the Respondents in the case, meaning that INT was required to drop those Respondents from the case.
- In the remainder of such cases, OSD found that there was sufficient evidence for at least one claim against all Respondents, but insufficient evidence for certain other claims, meaning that INT was required to drop those claims from the case.



OSD DETERMINATIONS BY RESPONDENT

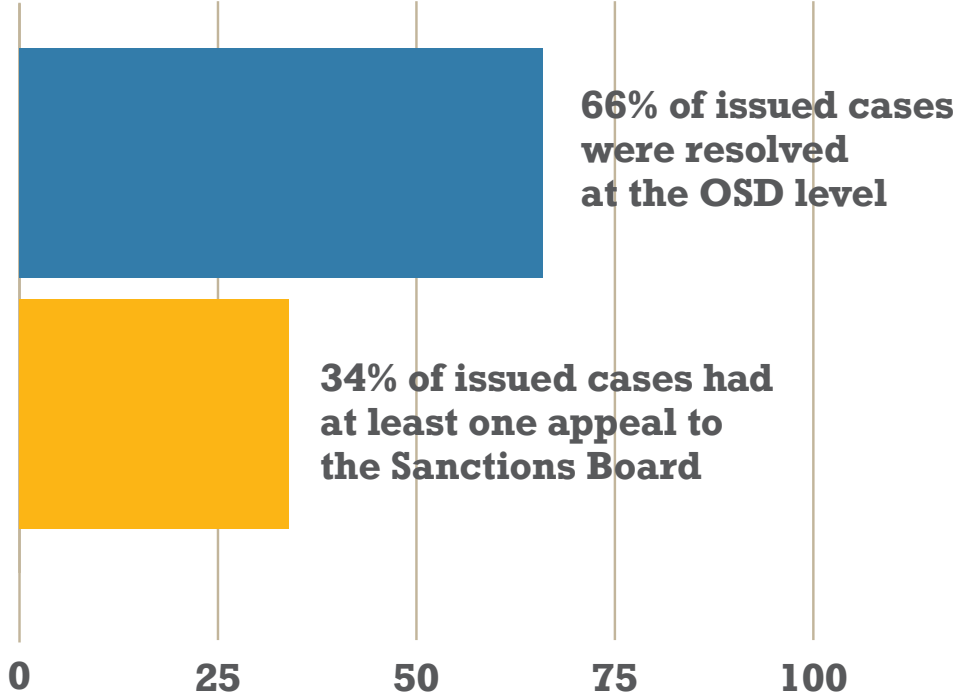
There is another way to look at OSD's determinations, which is to consider the proportion of respondents for which OSD found that there was sufficient evidence for at least one instance of sanctionable misconduct. For 85% of the Respondents in cases reviewed to date, OSD found that there was sufficient evidence for at least one INT claim, meaning that there was a basis for the SDO to recommend a sanction and impose a temporary suspension. For the remaining 15% of the Respondents, OSD found that there was insufficient evidence on all claims, meaning that INT was required to drop those Respondents from the case.

BREAKDOWN: RESPONDENT FIRMS VS. RESPONDENT INDIVIDUALS



PERCENTAGE OF ISSUED CASES RESOLVED AT OSD LEVEL

This chart shows the percentage of sanctions cases issued by OSD in which none of the Respondents submitted an appeal to the Sanctions Board, meaning that those cases were resolved at the OSD level.



ANNEX A

DETAILED BREAKDOWN OF DURATION OF CASES

This detailed chart shows all sanctions cases (excluding settlements) that have been submitted to OSD since its inception. The chart measures the time taken up in the investigative phase and in each phase of the sanctions process through final resolution. It should be noted that some cases, particularly those submitted in FY16 and FY17, are still active, and therefore the timelines for these cases are not complete, potentially skewing the overall picture to a small degree.

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
1.	72	06/29/04	06/05/07	1071	07/05/07	30	03/12/09	616	03/27/09	15	01/03/11	647	
2.	67	01/21/04	06/29/07	1255	08/13/07	45	10/15/07	63	11/13/07	29	11/16/07	3	12/04/07
3.	74	02/17/05	10/31/07	986	12/10/07	40	02/03/10	786	05/18/10	104	12/28/11	589	12/30/11
4.	73	04/28/03	11/16/07	1663	01/03/08	48	02/08/08	36	02/29/08	21	03/20/08	20	05/01/08
5.	68	07/20/04	05/16/08	1396	06/18/08	33	06/27/08	9	06/27/08	0	06/27/08	0	06/30/08
6.	75	05/09/06	07/14/08	797	08/19/08	36	08/26/08	7	08/26/08	0			08/28/08
7.	76	05/12/06	12/09/08	942	12/18/08	9	01/12/09	25	01/13/09	1	01/22/09	9	01/23/09
8.	77	07/15/05	12/31/08	1265	01/14/09	14	01/10/10	361					02/26/10
9.	78	07/29/06	03/12/09	957	03/18/09	6	03/19/09	1					03/31/09
10.	80	07/29/06	03/24/09	969	04/03/09	10							04/09/09
11.	82	07/25/06	03/25/09	974	04/03/09	9							04/09/09
12.	81	11/14/08	03/26/09	132	04/10/09	15	04/17/09	7					04/21/09
13.	79	07/29/06	03/30/09	975	04/14/09	15	04/16/09	2					04/20/09
14.	83	07/29/06	03/31/09	976	04/15/09	15	04/17/09	2					04/22/09
15.	84	07/25/06	04/10/09	990	05/11/09	31	09/30/09	142	10/29/09	29	11/10/09	12	11/16/09
16.	85	07/25/06	04/29/09	1009	05/11/09	12	06/26/09	46					06/30/09
17.	88	10/22/04	05/14/09	1665	05/29/09	15	06/12/09	14	07/02/09	20	07/20/09	18	08/04/09
18.	90	07/25/06	06/05/09	1046	06/19/09	14	06/26/09	7					06/30/09
19.	93	07/31/06	06/12/09	1047	06/26/09	14	07/06/09	10					07/10/09
20.	94	07/25/06	06/17/09	1058	06/26/09	9	07/06/09	10					07/10/09
21.	95	03/31/08	06/17/09	443	07/02/09	15	07/08/09	6	07/31/09	23	10/26/09	87	10/28/09
22.	91	04/28/05	06/22/09	1516	07/07/09	15	06/30/11	723	12/06/11	159	05/14/12	160	06/29/12
23.	86	07/25/06	06/24/09	1065	07/10/09	16	07/16/09	6					07/21/09
24.	96	07/29/06	06/24/09	1061	07/16/09	22	07/23/09	7	07/28/09	5	07/31/09	3	08/04/09

While this data gives a useful overview of the activity in the sanctions system and the typical life cycle of sanctions cases, it must be noted that many factors can have an impact on the timeline of a particular case, such as the complexity of the matters involved, stays for unsuccessful settlement negotiations during investigations, the need to obtain legal and procurement policy advice on case-specific matters, extensions to submission deadlines and additional submissions requested by the parties.

	Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
	SAE Withdrawn by INT on 01/03/11											2379	1308
18			02/13/08		71	03/14/08	30	06/03/08	81			1595	340
2		01/02/12		04/03/12	95							2602	1616
42			08/01/08	07/15/09	92	08/29/08	28	01/12/09	136			2086	423
3			09/05/08	04/29/09	67	02/27/09	175	04/24/09	56			1739	343
2			12/05/08		99	01/23/09	49	04/24/09	91			1081	284
1				05/13/09	110							1097	155
47			05/27/10	07/13/10	90	07/14/10	48	11/29/10	138			1963	698
12			05/10/09		40	06/24/09	45	10/20/09	118			1179	222
6				07/21/09	103							1088	119
6				07/21/09	103							1092	118
4			07/02/09		72	Notice Withdrawn (Settled on 07/02/09)						230	98
4				08/04/09	106							1102	127
5				08/04/09	104							1102	126
6				02/25/10	101							1311	321
4				11/17/09	140							1211	202
15				07/08/10	338							2085	420
4			09/17/09	11/12/09	79	10/22/09	35	04/01/10	161			1346	300
4			09/08/09		60	12/30/09	113	04/01/10	92			1340	293
4				10/27/09	109							1190	132
2			12/18/09		51	01/25/10	38	04/01/10	66			731	288
46		07/03/12	10/01/12		94	11/09/12	39	10/10/14	700			3452	1936
5				11/03/09	105							1197	132
4			09/03/09		30	12/30/09	118	04/01/10	92			1342	281

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
25.	98	07/25/06	06/24/09	1065	07/10/09	16	07/16/09	6	07/17/09	1	07/17/09	0	07/21/09
26.	92	12/01/05	06/25/09	1302	08/21/09	57	09/16/09	26	10/22/09	36	10/26/09	4	11/02/09
27.	97	07/31/06	06/25/09	1060	07/24/09	29	07/29/09	5					08/04/09
28.	100	07/26/06	06/26/09	1066	07/31/09	35	08/05/09	5					08/10/09
29.	102	05/25/04	06/26/09	1858	07/20/09	24	07/23/09	3	07/23/09	0	07/23/09	0	07/24/09
30.	104	12/12/05	06/29/09	1295	08/10/09	42	10/16/09	67	10/22/09	6	10/26/09	4	11/02/09
31.	87	07/25/06	06/30/09	1071	07/30/09	30	08/04/09	5					08/10/09
32.	89	07/25/06	06/30/09	1071	08/07/09	38	08/12/09	5	08/14/09	2	08/17/09	3	08/18/09
33.	99	11/11/08	06/30/09	231	09/18/09	80	10/05/09	17					10/15/09
34.	101	04/18/05	06/30/09	1534	11/24/09	147	04/12/11	504					08/24/11
35.	103	07/25/06	06/30/09	1071	08/21/09	52	08/27/09	6					08/31/09
36.	105	12/01/08	06/30/09	211	09/11/09	73	09/22/09	11					09/25/09
37.	106	02/02/09	06/30/09	148	09/04/09	66	09/16/09	12	09/22/09	6	09/22/09	0	09/25/09
38.	107	11/21/08	06/30/09	221	09/24/09	86	10/05/09	11	10/08/09	3	10/15/09	7	10/19/09
39.	108	11/24/08	06/30/09	218	10/02/09	94	10/08/09	6					10/15/09
40.	109	07/29/06	06/30/09	1067	08/28/09	59	09/03/09	6	09/04/09	1	09/08/09	4	09/17/09
41.	110	04/08/05	06/30/09	1544	11/10/09	133	11/20/09	10					02/26/10
42.	111	07/25/06	06/30/09	1071	08/28/09	59	09/03/09	6	09/04/09	1	09/08/09	4	09/17/09
43.	112	01/08/04	06/30/09	2000	12/16/09	169	04/06/11	476	05/18/11	42	07/26/11	69	08/04/11
44.	113	09/27/04	06/30/09	1737	01/22/10	206	06/30/11	524	10/22/11	114	05/14/12	205	06/29/12
45.	114	11/14/08	07/31/09	259	08/14/09	14	08/20/09	6	08/25/09	5	08/26/09	1	08/26/09
46.	115	04/16/08	09/30/09	532	10/15/09	15	10/21/09	6	10/23/09	2			11/09/09
47.	117	07/24/06	11/12/09	1207	02/04/10	84	03/16/10	40	02/09/11	330	05/25/11	105	06/15/11
48.	118	03/10/09	11/24/09	259	12/22/09	28	01/26/11	400					02/04/11
49.	119	03/30/04	12/17/09	2088	02/26/10	71	06/30/11	489					09/01/11
50.	TS1	10/26/09	12/17/09	52	01/26/10	40	03/11/10	44			05/25/10	75	
51.	116	10/12/08	12/30/09	444	04/14/10	105	05/15/12	762	12/21/12	220			
52.	120	08/14/06	12/30/09	1234	03/10/10	70	03/17/10	7					04/22/10

	Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
	4	04/29/11		07/29/11	738							1830	765
	7			02/16/10	106							1538	236
	6			11/12/09	100							1200	140
	5	05/21/11		08/22/11	742							1853	787
	1		10/21/09		89	01/15/10	86	09/20/10	248			2309	451
	7		12/28/09		56	02/02/10	36	04/01/10	58			1571	276
	6			11/17/09	99							1211	140
	1			12/01/09	105							1225	154
	10			01/21/10	98							436	205
	134	09/06/11		12/06/11	104							2423	889
	4	04/29/11		07/29/11	697							1830	759
	3		01/21/10		118	03/05/10	43	09/20/10	199			658	447
	3			01/11/10	108							343	195
	4		01/08/10		81	02/18/10	41	09/20/10	214			668	447
	7			01/21/10	98							423	205
	9			12/22/09	96							1242	175
	98		05/27/10		90	07/14/10	48	11/29/10	138			2061	517
	9	06/01/11		08/31/11	713							1863	792
	9	08/08/11	11/17/11		105	03/15/12	119	09/04/12	173			3162	1162
	46	07/02/12		11/19/12	143	Settlement on 11/19/12						2975	1238
	0			11/25/09	91							376	117
	17		02/25/10		108	04/07/10	41	09/20/10	166			887	355
	21	06/20/11	09/16/11	09/20/11	93	11/02/11	47	05/30/12	210			2137	930
	9	02/09/11	05/05/11	05/11/11	90	06/09/11	35	05/30/12	356			1177	918
	63	09/06/11	05/10/12		252	07/05/12	56	01/31/14	575			3594	1506
RTS Withdrawn by INT on 5/25/10												211	159
Case Closed by OSD on 12/21/12 for Insufficiency of Evidence												1531	1087
	36		07/25/10	08/03/11	94	08/26/10	32	11/29/10	95			1568	334

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)	
53.	TS2	10/26/09	12/30/09	65	01/26/10	27	03/11/10	44		05/25/10	75		
54.	124	03/30/04	02/22/10	2155	02/09/11	352	12/27/11	321	03/30/12	94	05/21/12	52	06/01/12
55.	122	12/14/05	02/24/10	1533	05/21/10	86	03/11/11	294	04/20/11	40	10/18/11	181	10/25/11
56.	121	11/06/08	03/01/10	480	05/28/10	88	12/03/10	189	12/13/10	10	01/11/11	29	02/04/11
57.	123	07/30/08	03/02/10	580	04/30/10	59	06/27/11	423	08/19/11	53			
58.	125	05/25/09	03/04/10	283	07/08/10	126	09/03/10	57					09/08/10
59.	128	05/12/08	03/25/10	682	04/30/10	36	06/29/11	425	08/19/11	51			
60.	127	04/29/08	03/26/10	696	07/29/10	125	01/06/11	161	01/26/11	20	03/18/11	51	03/24/11
61.	136	12/31/07	03/30/10	820	05/27/10	58	04/13/11	321					04/21/11
62.	130	09/22/08	03/31/10	555	06/25/10	86	03/24/11	272					04/11/11
63.	131	07/22/08	03/31/10	617	06/08/10	69	06/29/11	386					07/06/11
64.	134	09/29/08	03/31/10	548	07/09/10	100	03/02/11	236	03/18/11	16	06/10/11	84	06/14/11
65.	135	04/07/09	03/31/10	358	06/10/10	71	03/17/11	280					03/23/11
66.	137	04/29/08	03/31/10	701	07/29/10	120	01/06/11	161	01/26/11	20	03/18/11	51	03/24/11
67.	138	06/27/07	03/31/10	1008	08/02/10	124	06/17/11	319					
68.	139	03/30/10	04/02/10	3	04/13/10	11	04/14/10	1					04/16/10
69.	143	10/26/09	05/21/10	207	06/23/10	33	02/28/11	250	03/17/11	17			
70.	129	11/16/09	05/25/10	190	08/06/10	73	05/17/11	284					05/26/11
71.	142	10/26/09	05/25/10	211	06/08/10	14	02/28/11	265					03/09/11
72.	132	10/16/09	05/26/10	222	08/31/10	97	12/29/10	120	01/11/11	13	01/21/11	10	02/04/11
73.	133	02/17/05	05/28/10	1926	08/31/10	95	12/03/10	94					12/16/10
74.	140	11/13/09	05/28/10	196	08/31/10	95							
75.	144	11/13/09	06/04/10	203	09/01/10	89	03/09/11	189					03/15/11
76.	141	01/29/09	06/28/10	515	09/17/10	81	02/28/11	164					03/09/11
77.	126	03/30/04	06/29/10	2282	02/09/11	225	04/10/13	791	04/02/14	357			06/26/14
78.	145	10/07/08	06/29/10	630	09/30/10	93	03/10/11	161					03/22/11
79.	146	10/07/08	06/29/10	630	09/30/10	93	03/10/11	161					03/23/11
80.	148	08/09/06	06/29/10	1420	10/18/10	111	05/30/11	224					

	Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
RTS Withdrawn by INT on 5/25/10											211	146	
11		06/06/12	09/18/12		109	10/18/12	30	01/31/14	470			3594	1439
7		08/27/12	11/26/12	02/28/12	398	12/26/12	30	03/31/14	460			3029	1496
24		02/07/11	05/17/11		102	07/01/11	45	05/30/12	334			1301	821
Case Closed by OSD on 8/19/11 for Insufficiency of Evidence											1115	535	
5			02/09/11	03/03/11	154	03/11/11	30	09/26/11	199			854	571
Case Closed by OSD on 8/19/11 for Insufficiency of Evidence											1194	512	
6		03/25/11		06/24/11	92							1151	455
8		04/25/11		07/26/11	96							1303	483
18		04/13/11	06/16/11		66	07/18/11	32	05/30/12	317			1346	791
7		12/22/11		03/22/12	260							1339	722
4			07/28/11		44	08/26/11	29	05/30/12	278			1339	791
6		03/29/11		06/28/11	97							812	454
6		03/25/11		06/24/11	92							1151	450
SAE Withdrawn by INT on 6/17/11											1451	443	
2				04/29/10	13							30	27
Case Closed by OSD on 3/17/11 for Insufficiency of Evidence											507	300	
9		05/30/11		08/30/11	96							652	462
9		03/11/11		06/10/11	93							592	381
14		08/26/11		11/29/11	298							774	552
13		12/22/10	03/08/11		82	04/06/11	29	09/26/11	173			2412	486
Case Closed by OSD on 8/31/10 for Insufficiency of Evidence											291	95	
6		03/17/11		06/16/11	93							580	377
9		08/17/11		11/16/11	252							1021	506
85		08/04/14		11/04/14	131							3871	1589
12		04/07/11	08/03/11		134	09/01/11	29	05/30/12	272			1331	701
13		03/26/11	06/22/11		91	09/01/11	71	05/30/12	272			1331	701
SAE Withdrawn by INT on 5/30/11											1755	335	

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
81.	150	11/10/08	06/29/10	596	01/31/11	216	06/16/11	136					07/14/11
82.	155	01/10/09	06/29/10	535	11/30/10	154	03/28/11	118	04/29/11	32			
83.	149	08/08/06	06/30/10	1422	10/18/10	110	05/30/11	224					
84.	151	02/05/08	06/30/10	876	10/28/10	120	03/28/11	151					03/31/11
85.	153	07/03/08	06/30/10	727	10/29/10	121	04/13/11	166					04/21/11
86.	154	06/23/06	06/30/10	1468	09/21/10	83	12/03/10	73					12/16/10
87.	156	09/06/06	08/05/10	1429	10/18/10	74	05/30/11	224					
88.	157	01/06/09	09/27/10	629	11/24/10	58	12/03/10	9					12/16/10
89.	163	12/15/09	09/28/10	287	01/31/11	125	02/14/11	14					02/23/11
90.	158	12/17/09	09/29/10	286	12/28/10	90	03/11/11	73					03/17/11
91.	159	07/21/09	09/30/10	436	11/03/10	34	03/25/11	142					03/31/11
92.	162	09/02/08	09/30/10	758	11/30/10	61	02/23/11	85					03/01/11
93.	160	12/17/09	10/04/10	291	12/28/10	85							
94.	164	12/17/09	10/13/10	300	12/28/10	76							
95.	165	12/19/09	10/22/10	307	11/30/10	39	03/24/11	114					03/31/11
96.	167	05/03/10	01/25/11	267	02/18/11	24	03/29/11	39					04/07/11
97.	169	03/08/10	03/11/11	368	03/31/11	20	04/12/11	12					04/27/11
98.	168	03/31/09	03/21/11	720	04/21/11	31	05/09/11	18					05/16/11
99.	171	03/09/09	03/22/11	743	04/27/11	36	08/02/11	97					08/05/11
100.	166	04/07/09	03/24/11	716	04/20/11	27	05/16/11	26					05/19/11
101.	161	01/28/10	03/28/11	424	05/31/11	64	07/15/11	45					07/27/11
102.	172	08/03/10	03/30/11	239	05/31/11	62	07/15/11	45					07/20/11
103.	174	10/22/09	03/31/11	525	05/25/11	55	06/21/11	27					06/30/11
104.	175	08/10/10	03/31/11	233	06/30/11	91	07/15/11	15					07/20/11
105.	176	08/05/10	05/06/11	274	07/28/11	83	10/20/11	84					10/26/11
106.	177	12/31/07	05/19/11	1235									06/07/11
107.	178	04/29/09	06/10/11	772	06/30/11	20	09/30/11	92					10/06/11
108.	173	02/16/10	06/14/11	483	09/28/11	106	10/04/11	6	10/04/11	0	10/17/11	13	10/17/11

Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)	
28	07/19/11		10/18/11	96							1072	476	
Case Closed by OSD on 4/29/11 for Insufficiency of Evidence											839	304	
SAE Withdrawn by INT on 5/30/11											1756	334	
3	04/04/11	06/27/11		88	07/26/11	29	05/30/12	309			1576	700	
8	04/26/11		07/26/11	96							1118	391	
13	12/17/10	03/01/11		75	Notice Withdrawn by INT on 03/01/11							1712	244
SAE Withdrawn by INT on 5/30/11											1727	298	
13	12/20/10	04/19/11	11/28/11	347	Settlement on 11/28/11							1056	427
9	03/01/11		06/01/11	98							533	246	
6	10/01/11		01/04/12	293							748	462	
6	04/05/11	09/06/11		159	10/12/11	36	03/07/13	512			1325	889	
6	03/04/11		06/03/11	94							1004	246	
Case Closed by OSD on 12/28/10 for Insufficiency of Evidence											376	85	
Case Closed by OSD on 12/28/10 for Insufficiency of Evidence											376	76	
7	08/20/11		11/21/11	235							702	395	
9	04/13/11		07/13/11	97							436	169	
15	07/16/11		10/17/11	173							588	220	
7	05/18/11		08/17/11	93							869	149	
3	08/22/11		11/22/11	109							988	245	
3	05/23/11		08/23/11	96							868	152	
12	07/29/11		10/18/11	83	Settlement on 10/18/11							628	204
5	11/10/11		02/09/12	204							555	316	
9	07/04/11	10/28/11		120	11/15/11	18	10/16/12	336			1090	565	
5	07/25/11		10/25/11	97							441	208	
6	10/31/11		01/31/12	97							544	270	
19	06/08/11	09/07/11		92	10/27/11	50	06/10/13	592			1988	753	
6	03/17/12		06/18/12	256							1146	374	
0	10/21/11	01/19/12		94	07/02/12	165	05/02/14	669			1536	1053	

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)	
	109.	179	01/20/11	06/17/11	148	07/28/11	41						08/04/11	
	110.	152	10/26/09	06/28/11	610	12/20/11	175	05/09/12	141				05/11/12	
	111.	180	06/22/08	06/30/11	1103	09/16/11	78	10/23/13	768					
	112.	181	08/04/10	06/30/11	330	08/23/11	54						08/31/11	
	113.	182	04/29/09	06/30/11	792	07/28/11	28						08/05/11	
	114.	147	08/28/09	07/20/11	691	12/18/12	517							
	115.	TS3	04/15/11	08/30/11	137	09/30/11	31	10/03/11	3				10/05/11	
	116.	183	08/04/10	10/05/11	427	10/28/11	23						11/02/11	
	117.	187	06/08/11	10/13/11	127	12/01/11	49						12/07/11	
	118.	186	08/04/10	11/18/11	471	12/12/11	24						12/15/11	
	119.	170	04/15/11	12/30/11	259	03/28/12	89	04/25/12	28	05/02/12	7	05/02/12	0	05/08/12
	120.	188	01/13/09	01/13/12	1095	02/09/12	27							
	121.	TS4	05/20/10	02/02/12	623	03/08/12	35	03/13/12	5	03/20/12	7		03/26/12	
	122.	190	06/15/10	02/24/12	619	03/28/12	33						04/04/12	
	123.	195	06/05/09	03/27/12	1026	04/17/12	21						05/04/12	
	124.	194	06/05/09	03/28/12	1027	04/24/12	27						05/07/12	
	125.	191	12/08/10	03/29/12	477	05/23/12	55	07/12/12	50				07/16/12	
	126.	TS5	09/02/11	03/29/12	209	04/30/12	32						05/10/12	
	127.	192	07/31/10	03/30/12	608	07/03/12	95	07/27/12	24				07/31/12	
	128.	193	06/05/09	03/30/12	1029	04/30/12	31	06/11/12	42				06/12/12	
	129.	197	08/24/11	04/30/12	250	05/16/12	16	05/24/12	8				05/25/12	
	130.	196	12/09/10	05/31/12	539	07/20/12	50						07/31/12	
	131.	198	07/22/08	05/31/12	1409	08/07/12	68	08/23/12	16				08/27/12	
	132.	199	12/15/10	05/31/12	533	06/29/12	29	06/29/12	0				07/06/12	
	133.	202	09/29/09	06/18/12	993	08/31/12	74	04/23/13	235	06/07/13	45	07/07/14	395	07/17/14
	134.	204	01/19/12	06/25/12	158	08/07/12	43	08/09/12	2				08/15/12	
	135.	201	09/28/11	06/29/12	275	09/06/12	69	06/28/13	295				07/08/13	
	136.	206	10/06/11	06/29/12	267	09/13/12	76						09/20/12	

	Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)	
	7	08/09/11		11/08/11	96							292	144	
	2	05/15/12		08/14/12	91							1019	409	
SAE Withdrawn by INT on 10/23/13												1949	846	
	8	09/05/11		12/06/11	97							489	159	
	8	03/17/12		06/18/12	318							1146	354	
Case Closed by OSD on 12/18/12 for Insufficiency of Evidence												1208	517	
	2	10/07/11								12/30/11	86	259	122	
	5	11/07/11		02/07/12	97							552	125	
	6	12/12/11	08/31/12		268	10/05/12	35	06/24/13	262			747	620	
	3	12/20/11		03/20/12	96							594	123	
	6	05/11/12	09/17/12		132	10/18/12	31	09/09/13	326			878	619	
Settlement on 2/9/12												1122	27	
	6	03/27/12								03/26/13	365	1041	418	
	7	07/12/12		10/11/12	190							849	230	
	17	05/08/12		08/07/12	95							1159	133	
	13	11/05/12	04/03/13		331	04/29/13	26	06/16/14	413			1837	810	
	4	07/20/12		10/19/12	95							681	204	
	10	05/14/12		RTS Withdrawn by INT on 8/9/12							08/09/12	91	342	133
	28	08/16/12		11/15/12	107							862	254	
	1	06/18/12	10/03/12		113	11/21/12	49	06/16/14	572			1837	808	
	1	05/30/12	08/10/12		77	09/12/12	33	11/15/13	429			814	564	
	11	08/08/12		11/07/12	99							699	160	
	4	10/27/12		01/29/13	155							1652	243	
	7	08/13/12		11/13/12	130							699	166	
	10	07/21/14	10/31/14		106	12/23/14	53	09/30/15	281			2192	1199	
	6	08/21/12	11/20/12		97	01/10/13	51	06/23/14	529			886	728	
	10	07/11/13	10/06/13	10/10/13	94	11/14/13	39	10/24/14	344			1126	851	
	7	09/25/12	12/20/12		91	01/22/13	33	06/30/14	524			998	731	

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
137.	207	11/30/11	06/29/12	212	10/04/12	97							10/11/12
138.	205	08/31/10	07/25/12	694	10/25/12	92							11/05/12
139.	208	04/06/09	07/25/12	1206	10/17/12	84	11/30/12	44					12/11/12
140.	209	09/01/10	07/27/12	695	08/17/12	21							08/21/12
141.	211	07/23/11	08/22/12	396	12/13/12	113	02/11/13	60					02/15/13
142.	TS6	05/16/11	08/28/12	470	09/19/12	22							
143.	189	10/03/11	08/31/12	333	11/08/12	69							11/20/12
144.	213	12/14/10	08/31/12	626	12/21/12	112							01/07/13
145.	216	05/16/11	09/19/12	492	09/21/12	2							09/26/12
146.	210	08/09/10	09/28/12	781	11/19/12	52							11/30/12
147.	184	07/29/10	11/05/12	830	03/26/13	141	07/09/13	105					10/25/13
148.	212	08/12/11	11/05/12	451	12/12/12	37	02/07/13	57					02/19/13
149.	247	08/09/10	11/27/12	841	02/19/13	84							
150.	TS7	11/22/10	12/21/12	760	01/16/13	26	01/25/13	9					01/29/13
151.	256	08/09/10	12/27/12	871	02/05/13	40	03/05/13	28					03/11/13
152.	244	04/07/11	01/25/13	659	05/03/13	98	06/24/13	52	06/28/13	4	08/05/13	38	08/22/13
153.	200	07/29/10	02/20/13	937	12/03/13	286	02/11/14	70					03/31/14
154.	257	01/23/12	02/26/13	400	03/01/13	3							03/07/13
155.	249	05/16/11	03/08/13	662	11/04/13	241	02/06/14	94					03/21/14
156.	258	01/30/12	03/26/13	421	04/17/13	22							
157.	215	03/29/12	03/28/13	364	05/06/13	39	08/15/13	101	08/21/13	6			08/23/13
158.	267	05/31/12	04/02/13	306	04/03/13	1							04/04/13
159.	185	04/29/11	04/18/13	720	05/29/13	41	08/29/13	92	09/19/13	21			09/26/13
160.	269	11/30/10	04/29/13	881	05/30/13	31	07/03/14	399					07/09/14
161.	259	02/15/09	05/20/13	1555	07/11/13	52							
162.	268	03/13/12	05/20/13	433	06/19/13	30	06/19/13	0					06/27/13
163.	273	07/24/11	05/29/13	675	06/18/13	20	06/19/13	1					06/27/13
164.	261	10/28/11	05/30/13	580	06/18/13	19							06/21/13

Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
7	10/15/12		01/15/13	96							412	200
11	11/09/12		02/08/13	95							892	198
11	12/17/12	03/08/13		87	04/03/13	26	05/19/14	411			1869	663
4	09/04/12		12/04/12	105							825	130
4	02/22/13	05/15/13		89	06/24/13	40	07/15/14	386			1088	692
RTS Stayed at INT's Request on 9/19/12; Superseded by SAE and Deemed Withdrawn by INT on 3/8/13											492	22
12	11/14/13		02/14/14	451							865	532
17	02/08/13		05/10/13	123							878	252
5	10/01/12	06/19/13		266	07/22/13	33	07/09/14	352			1150	658
11	12/05/12		03/07/13	97							941	160
108	10/29/13		03/31/14	157							1341	511
12	12/16/13		03/19/14	393							950	499
Case Closed by OSD on 2/19/13 for Insufficiency of Evidence											925	84
4	01/30/13								07/26/13	178	977	217
6	03/19/13		06/18/13	99							1044	173
17	08/27/13		11/26/13	96							964	305
48	04/02/14		07/02/14	93							1434	497
6	03/12/13		06/11/13	91							500	100
43	03/24/14	11/19/14		243	01/22/15	64	06/29/16	524			1871	1209
Settlement on 4/17/13											443	22
2	08/26/13	04/14/14		234	06/23/14	70	09/29/15	463			1279	915
1	04/08/13		07/09/13	96							404	98
7	10/01/13		01/02/14	98							979	259
6	11/11/14		02/10/15	216							1533	652
Case Closed by OSD on 7/11/13 for Insufficiency of Evidence											1607	52
8	07/02/13		10/01/13	96							567	134
8	07/05/13		10/04/13	99							803	128
3	02/03/14		05/06/14	319							921	341

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
165.	248	12/13/10	05/31/13	900	06/18/13	18	06/18/13	0					06/21/13
166.	264	11/10/10	06/24/13	957	07/31/13	37	10/28/13	89					10/30/13
167.	274	12/09/10	06/24/13	928	07/24/13	30	09/16/13	54					09/24/13
168.	266	07/28/10	06/28/13	1066	01/30/14	216	05/30/14	120					06/26/14
169.	283	06/19/08	07/26/13	1863	10/02/13	68	02/05/14	126					02/11/14
170.	277	10/10/11	07/31/13	660	08/29/13	29	12/18/13	111					01/02/14
171.	291	10/25/11	08/30/13	675	02/14/14	168							02/25/14
172.	294	08/31/12	08/30/13	364	09/30/13	31	10/11/13	11					10/16/13
173.	295	11/12/10	09/12/13	1035	12/06/13	85							12/13/13
174.	296	12/06/12	09/30/13	298	10/01/13	1	10/04/13	3					10/09/13
175.	301	06/03/11	09/30/13	850	10/09/13	9							10/15/13
176.	203	08/04/11	10/17/13	805	10/21/13	4	11/04/13	14					11/06/13
177.	214	12/14/10	10/17/13	1038	10/21/13	4							10/28/13
178.	254	08/31/10	10/17/13	1143	11/04/13	18							11/12/13
179.	255	05/18/10	10/17/13	1248	10/24/13	7							11/01/13
180.	281	03/23/12	11/04/13	591	12/16/13	42	12/18/13	2					01/02/14
181.	TS8	12/06/07	11/04/13	2160	11/22/13	18	12/03/13	11					12/04/13
182.	270	05/14/12	11/06/13	541	12/18/13	42	12/23/13	5					01/03/14
183.	302	04/27/12	11/26/13	578	01/16/14	51	01/17/14	1					01/24/14
184.	276	05/10/12	12/04/13	573	01/30/14	57	02/28/14	29					03/07/14
185.	260	02/14/12	12/17/13	672	02/14/14	59							02/20/14
186.	303	05/15/12	12/17/13	581	01/30/14	44							02/05/14
187.	309	05/25/12	12/17/13	571	02/28/14	73	03/24/14	24					04/04/14
188.	262	10/22/12	12/20/13	424	01/16/14	27							01/24/14
189.	322	01/04/12	12/20/13	716	03/18/14	88							04/07/14
190.	315	04/08/13	12/24/13	260	04/04/14	101							04/10/14
191.	318	04/08/13	01/22/14	289	04/09/14	77							04/21/14
192.	323	11/28/12	01/31/14	429	05/23/14	112	08/01/14	70					08/06/14

Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
3	07/04/13		10/03/13	104							1025	125
2	11/11/13		02/11/14	104							1189	232
8	09/30/13		01/02/14	100							1120	192
27	06/30/14		09/30/14	96							1525	459
6	02/12/14	05/12/14		90	09/18/14	129	06/30/15	285			2567	704
15	03/26/14		06/25/14	174							989	329
11	06/20/14		09/19/14	206							1060	385
5	11/14/13		02/14/14	121							532	168
7	12/16/13		03/19/14	96							1223	188
5	12/24/13		03/25/14	167							474	176
6	03/10/14		06/10/14	238							1103	253
2	11/11/13		02/11/14	97							922	117
7	02/24/14		05/28/14	212							1261	223
8	02/24/14		05/28/14	197							1366	223
8	03/04/14		06/03/14	214							1477	229
15	01/07/14	04/03/14		91	05/16/14	43	Case Closed (Withdrawn by INT) on 5/16/14				784	193
1	12/10/13								12/03/14	364	2554	394
11	01/17/14		04/18/14	105							704	163
7	01/27/14		04/29/14	95							732	154
7	03/13/14		06/12/14	97							763	190
6	02/24/14	05/21/14		90	06/20/14	30	11/06/14	139			996	324
6	09/02/14		12/02/14	300							931	350
11	04/07/14		07/08/14	95							774	203
8	04/14/14		07/15/14	172							631	207
20	04/10/14	07/09/14		93	08/08/14	30	06/30/15	326			1273	557
6	05/26/14		08/26/14	138							505	245
12	04/24/14		07/24/14	94							472	183
75	02/23/15		05/27/15	294							980	551

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
193.	299	07/26/12	02/07/14	561	03/21/14	42							04/09/14
194.	321	04/08/13	02/07/14	305	04/15/14	67	04/21/14	6					05/06/14
195.	293	08/08/12	02/11/14	552	04/25/14	73	07/30/14	96					08/05/14
196.	TS9	01/23/14	02/12/14	20	02/18/14	6							02/21/14
197.	TS10	12/18/13	02/20/14	64	04/03/14	42							
198.	TS11	11/22/13	03/06/14	104	03/28/14	22							03/31/14
199.	326	06/10/08	03/11/14	2100	04/07/14	27	05/12/14	35	05/30/14	18			06/09/14
200.	TS12	09/20/12	03/24/14	550	05/02/14	39	05/12/14	10					05/19/14
201.	313	02/01/10	03/27/14	1515	08/26/14	152	09/19/14	24					11/24/14
202.	325	04/16/13	03/31/14	349	05/12/14	42	06/17/14	36					07/28/14
203.	305	05/12/12	04/01/14	689	10/07/14	189	10/20/14	13					11/04/14
204.	306	02/10/12	04/01/14	781	10/06/14	188	10/20/14	14					11/04/14
205.	251	05/16/11	04/07/14	1057	07/25/14	109	08/28/14	34					09/25/14
206.	333	03/13/13	04/21/14	404	05/09/14	18	05/27/14	18					06/02/14
207.	TS13	11/07/13	04/29/14	173	05/14/14	15							05/21/14
208.	335	12/06/12	05/15/14	525	06/03/14	19	06/03/14	0					06/05/14
209.	327	11/20/12	05/19/14	545	06/10/14	22	06/16/14	6					06/25/14
210.	317	12/20/11	05/27/14	889	09/26/14	122	10/02/14	6					10/08/14
211.	332	08/27/12	05/28/14	639	06/24/14	27							06/30/14
212.	324	02/22/12	06/02/14	831	08/05/14	64	09/03/14	29					09/25/14
213.	287	03/08/12	06/18/14	832	09/05/14	79	09/09/14	4					09/12/14
214.	TS14	12/12/13	06/19/14	189	07/03/14	14	07/03/14	0					07/07/14
215.	314	12/07/11	06/30/14	936	11/20/14	143	11/21/14	1					12/02/14
216.	338	05/16/11	06/30/14	1141	11/05/14	128	11/17/14	12					12/04/14
217.	311	10/24/12	07/09/14	623	10/14/14	97	10/30/14	16					11/06/14
218.	342	08/08/13	07/11/14	337	07/17/14	6	07/22/14	5					07/29/14
219.	331	05/23/12	07/18/14	786	11/04/14	109							11/17/14
220.	340	04/12/13	08/13/14	488	11/25/14	104	12/22/14	27					01/08/15

	Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
	19	04/25/14	08/25/14		138	09/25/14	31	08/10/15	319			1110	549
	15	05/19/14		08/19/14	105							498	193
	6	09/03/14		12/03/14	120							847	295
	3	02/25/14								02/19/15	363	392	372
RTS Stayed at INT's Request on 3/4/14; Withdrawn by INT on 4/3/14												106	42
	3	04/02/14								12/19/14	263	392	288
	10	06/12/14	08/05/14		57	11/05/14	92	06/30/15	237			2576	476
	7	05/28/14								11/04/14	169	775	225
	66	11/26/14		02/25/15	93							1850	335
	41	07/31/14		10/30/14	94							562	213
	15	11/07/14		02/06/15	94							1000	311
	15	11/10/14		02/10/15	98							1096	315
	28	09/30/14	01/16/15		113	03/03/15	46	06/29/16	484			1871	814
	6	06/05/14		09/24/14	114			Settlement on 9/24/14				560	156
	7	05/23/14								05/20/15	364	559	386
	2	06/09/14	11/19/14		167	01/15/15	57	09/29/15	257			1027	502
	9	06/30/14	09/25/14		92	3/25/15	181	Settlement on 3/25/15				855	310
	6	10/09/14		01/29/15	113							1136	247
	6	07/03/14		10/02/14	94							766	127
	22	02/23/15		05/27/15	244							1190	359
	3	09/16/14		12/16/14	95							1013	181
	4	07/11/14								07/07/15	365	572	383
	11	12/10/14		03/11/15	99							1190	254
	17	12/09/14		03/10/15	96							1394	253
	7	03/31/15	06/29/15		235	10/28/15	121	Case Closed (Withdrawn by INT) on 10/28/15				1099	476
	7	03/16/15		06/16/15	322							677	340
	13	11/21/14		02/20/15	95							1003	217
	17	03/23/15		06/23/15	166							802	314

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
221.	TS15	10/18/13	08/20/14	306	10/03/14	44	10/06/14	3					10/15/14
222.	355	10/03/13	09/08/14	340	09/12/14	4							09/26/14
223.	310	10/11/12	09/18/14	707	02/05/15	140	02/27/15	22					04/02/15
224.	329	03/08/12	09/30/14	936	12/24/14	85	01/21/15	28					02/04/15
225.	339	01/05/11	09/30/14	1364	02/13/15	136	03/16/15	31					03/27/15
226.	TS16	10/24/13	10/27/14	368	12/22/14	56							01/06/15
227.	369	09/20/12	11/04/14	775	11/13/14	9							11/24/14
228.	351	11/19/13	11/20/14	366	12/22/14	32							01/15/15
229.	372	06/01/11	12/03/14	1281	01/15/15	43	02/03/15	19					02/11/15
230.	377	11/18/13	12/19/14	396	03/02/15	73	03/13/15	11					03/24/15
231.	354	10/10/12	12/22/14	803	01/30/15	39	02/27/15	28	03/06/15	7	03/27/15	21	03/31/15
232.	383	09/08/10	12/23/14	1567	02/13/15	52	03/17/15	32					04/08/15
233.	352	11/19/13	01/14/15	421	03/11/15	56							04/08/15
234.	357	10/16/13	01/14/15	455	05/29/15	135	06/08/15	10					06/25/15
235.	TS18	11/05/13	01/23/15	444	03/06/15	42							03/23/15
236.	TS17	10/30/14	01/27/15	89	03/06/15	38	03/12/15	6					03/19/15
237.	348	03/08/12	02/02/15	1061	04/13/15	70	05/14/15	31					05/27/15
238.	347	01/23/14	02/19/15	392	06/30/15	131	07/28/15	28					08/03/15
239.	349	09/19/12	03/02/15	894	05/04/15	63	05/15/15	11					06/01/15
240.	368	11/16/12	03/12/15	846	05/15/15	64	07/07/15	53					07/10/15
241.	364	07/09/13	03/13/15	612	04/24/15	42	10/20/15	179					10/26/15
242.	376	09/03/13	03/26/15	569	08/13/15	140							08/25/15
243.	375	01/09/14	04/29/15	475	06/01/15	33							06/22/15
244.	387	01/02/14	05/05/15	488	06/30/15	56	07/28/15	28					08/03/15
245.	393	10/24/12	05/13/15	931	08/06/15	85	08/24/15	18					09/02/15
246.	TS19	12/08/14	05/18/15	161	07/20/15	63	08/14/15	25					08/19/15
247.	392	02/02/15	05/20/15	107	08/25/15	97							08/31/15
248.	397	11/07/13	05/20/15	559	07/13/15	54	07/15/15	2					07/20/15

	Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
	9	10/17/14								10/05/15	355	717	411
	14	09/30/14		12/30/14	95							453	113
	34	07/31/15		10/30/15	211							1114	407
	14	03/20/15		06/19/15	135							1198	262
	11	08/14/15	11/12/15		230	01/14/16	63	12/01/16	322			2157	793
	15	01/12/15								01/05/16	364	803	435
	11	04/02/15		07/02/15	220							1015	240
	24	01/19/15		04/21/15	96							518	152
	8	02/25/15	05/13/15		91	06/15/15	33	06/29/16	380			1855	574
	11	03/26/15		06/25/15	93							584	188
	4	04/02/15	08/31/15		153	09/29/15	29	06/21/16	266			1350	547
	22	04/10/15		07/10/15	93							1766	199
	28	04/14/15		07/14/15	97							602	181
	17	06/30/15	10/30/15		127	12/11/15	42	Pending	567			1353	898
	17	03/29/15								3/22/16	365	868	424
	7	03/30/15								3/17/16	364	504	415
	13	06/01/15		09/01/15	97							1272	211
	6	08/12/15	02/29/16		210	04/18/16	49	03/30/17	346			1162	770
	17	06/03/15	09/01/15		92	10/01/15	30	06/21/16	264			1371	477
	3	07/16/15		10/15/15	97							1063	217
	6	10/28/15		01/28/16	94							933	321
	12	08/31/15	01/08/16		136	02/08/16	31	11/21/16	287			1175	606
	21	06/26/15		09/25/15	95							624	149
	6	08/12/15	02/29/16		210	04/18/16	49	03/30/17	346			1183	695
	9	10/12/15	12/31/15		120	02/03/16	34	Pending	513			1710	779
	5	08/24/15								08/16/16	363	617	456
	6	09/02/15	01/15/16		137	02/19/16	35	Pending	497			879	772
	5	07/22/15	01/04/16		168	04/18/16	105	06/02/17	410			1303	744

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
249.	TS20	11/14/14	06/11/15	209	06/17/15	6							06/22/15
250.	359	03/11/14	06/23/15	469	08/07/15	45	10/20/15	74					10/29/15
251.	365	03/19/14	06/30/15	468	08/17/15	48	09/22/15	36	10/06/15	14			
252.	395	01/21/14	07/01/15	526	07/20/15	19	07/22/15	2					07/27/15
253.	389	12/11/13	07/07/15	573	08/31/15	55	09/03/15	3					09/09/15
254.	399	03/11/14	07/21/15	497	08/27/15	37							09/03/15
255.	400	10/31/13	07/29/15	636	09/10/15	43							09/16/15
256.	356	10/09/12	08/26/15	1051	09/16/15	21	10/05/15	19					10/13/15
257.	TS22	07/29/15	08/27/15	29	09/09/15	13	09/15/15	6					09/17/15
258.	385	03/21/14	08/31/15	528	09/15/15	15							10/07/15
259.	TS23	07/29/15	09/02/15	35	09/25/15	23	09/30/15	5					10/07/15
260.	TS24	07/29/15	09/25/15	58	10/06/15	11	10/15/15	9					10/19/15
261.	409	09/23/14	10/01/15	373	10/16/15	15							10/19/15
262.	386	07/24/13	10/05/15	803	11/16/15	42							11/24/15
263.	360	06/02/14	10/14/15	499	10/30/15	16							11/03/15
264.	366	03/11/14	10/14/15	582	11/23/15	40	12/10/15	17					12/15/15
265.	374	02/16/14	11/06/15	628	02/16/16	102	03/26/16	39					03/31/16
266.	345	09/22/10	12/01/15	1896	02/17/16	78	04/06/16	49					04/26/16
267.	370	11/27/12	12/02/15	1100	03/31/16	120	07/05/16	96					07/15/16
268.	402	01/28/15	12/08/15	314	12/14/15	6	12/21/15	7	12/24/15	3			12/29/15
269.	394	02/11/13	12/09/15	1031	02/17/16	70	03/30/16	42	04/12/16	13	04/29/16	17	05/05/16
270.	TS26	11/28/13	12/21/15	753	01/06/16	16							01/08/16
271.	330	09/05/11	12/22/15	1569	02/26/16	66	03/28/16	31					03/30/16
272.	411	11/12/14	12/22/15	405	01/29/16	38							02/03/16
273.	413	10/24/13	01/05/16	803	05/23/16	139							02/16/17
274.	307	12/17/09	01/07/16	2212	03/28/16	81							Case Closed by OSD on 3/28/16 for Insufficiency of Evidence
275.	403	01/21/15	02/04/16	379	04/11/16	67							04/20/16
276.	416	05/12/14	02/16/16	645	03/02/16	15							03/07/16

	Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
	5	06/30/15								06/21/16	365	585	376
	9	11/06/15		02/05/16	99							696	227
Case Closed by OSD on 10/6/15 for Insufficiency of Evidence												566	98
	5	10/15/15		01/14/16	171							723	197
	6	09/14/15		12/15/15	97							734	161
	7	09/07/15	02/04/16		154	03/07/16	32	06/21/17	471			1198	701
	6	10/05/15		01/05/16	111							796	160
	8	10/21/15		01/20/16	99							1198	147
	2	09/25/15								09/16/16	365	415	386
	22	10/12/15		01/12/16	97							662	134
	7	10/16/15								10/06/16	365	435	400
	4	10/26/15								10/06/16	353	435	377
	3	10/21/15	01/19/16		92	03/03/16	44	06/16/17	470			997	624
	8	11/27/15	04/28/16		156	06/28/16	61	06/23/17	360			1430	627
	4	11/09/15		02/09/16	98							617	118
	5	02/22/16		05/24/16	161							805	223
	5	04/05/16	07/01/16		92	08/04/16	34	Pending	330			1230	602
	20	04/29/16	08/29/16		125	10/27/16	59	Pending	246			2473	577
	10	07/19/16		10/18/16	95							1421	321
	5	01/04/16		04/05/16	98							433	119
	6	05/08/16		08/09/16	96							1275	244
	2	01/11/16								06/07/16	151	922	169
	2	07/23/16	02/08/17		315	04/11/17	62	Pending	80			2125	556
	5	04/18/16		07/19/16	167							615	210
	269	02/20/17		05/23/17	96							1307	504
												2293	81
	9	04/25/16		07/26/16	97							552	173
	5	03/18/16		06/17/16	102							767	122

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
277.	358	03/19/14	02/19/16	702	04/05/16	46	05/12/16	37					05/19/16
278.	425	01/23/15	03/17/16	419	08/23/16	159	Pending	311					
279.	TS27	02/16/15	03/17/16	395	04/12/16	26	05/09/16	27	05/19/16	10			RTS Withdrawn by INT on 5/19/16
280.	250	11/13/09	03/21/16	2320	06/27/16	98	09/12/16	77					09/19/16
281.	420	11/14/13	03/21/16	858	05/16/16	56							05/25/16
282.	418	05/06/15	03/22/16	321	04/22/16	31							04/29/16
283.	426	09/03/13	03/22/16	931	06/06/16	76	07/05/16	29					07/07/16
284.	TS25	09/20/15	03/22/16	184	04/26/16	35	05/10/16	14					05/12/16
285.	415	05/06/15	03/31/16	330	05/10/16	40							05/17/16
286.	427	12/09/13	04/18/16	861	05/31/16	43	06/07/16	7					06/10/16
287.	TS28	12/17/15	04/18/16	123	05/05/16	17	05/11/16	6					05/12/16
288.	410	09/24/14	04/29/16	583	08/31/16	124	09/13/16	13					09/20/16
289.	421	01/09/13	05/19/16	1226	09/28/16	132	05/09/17	223	06/19/17	41	Pending	11	
290.	419	10/22/14	06/01/16	588	08/18/16	78	08/23/16	5					09/08/16
291.	433	11/28/13	06/07/16	922	06/10/16	3							06/22/16
292.	432	04/17/15	06/09/16	419	09/27/16	110	10/19/16	22					10/19/16
293.	412	05/16/12	06/10/16	1486	10/25/16	137	11/14/16	20					11/18/16
294.	431	09/30/14	06/21/16	630	01/09/17	202	03/06/17	56					03/15/17
295.	TS29	02/05/15	06/22/16	503	06/30/16	8	07/06/16	6					07/11/16
296.	442	06/21/15	08/16/16	422	12/02/16	108	01/17/17	46					01/27/17
297.	447	10/10/14	09/16/16	707	01/30/17	136	02/27/17	28					03/03/17
298.	453	03/08/16	09/23/16	199	10/04/16	11	10/04/16	0					10/05/16
299.	391	05/27/12	10/06/16	1593	02/13/17	130							Case Closed by OSD on 2/13/17 for Insufficiency of Evidence
300.	454	04/27/15	10/06/16	528	02/22/17	139	03/01/17	7					03/08/17
301.	434	02/07/14	10/24/16	990	11/21/16	28							12/02/16
302.	446	04/22/15	11/23/16	581	02/27/17	96	Pending	123					
303.	456	06/12/15	01/11/17	579	03/17/17	65	04/24/17	38					04/27/17
304.	443	07/21/15	01/17/17	546	05/31/17	134	06/06/17	6					06/09/17
305.	463	04/17/15	01/17/17	641	03/27/17	69	Pending	95					

Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
7	05/23/16		08/23/16	96							888	186
											889	470
											458	63
7	09/22/16		05/03/17	226			Settlement on 5/3/17				2728	408
9	05/27/16		08/26/16	93							1016	158
7	05/06/16		08/05/16	98							457	136
2	07/12/16	10/12/16		97	11/10/16	29	Pending	232			1396	465
2	05/17/16								05/11/17	364	599	415
7	05/24/16		08/23/16	98							475	145
3	06/14/16	10/26/16	09/13/16	138	11/28/16	33	Pending	214			1299	438
1	05/16/16								05/11/17	364	511	388
7	09/23/16		12/27/16	98							825	242
											1633	407
16	09/23/16		12/27/16	110							797	209
12	06/27/16	10/25/16		125	11/28/16	34	Pending	214			1310	388
0	10/25/16		01/24/17	97							648	229
4	12/12/16	04/21/17		154	05/24/17	33	Pending	37			1871	385
9	03/17/17		06/16/17	93							990	360
5	07/13/16								Pending	354	876	373
10	01/31/17	Pending		154							740	318
4	03/13/17		06/13/17	102							977	270
1	11/18/16		02/17/17	135							346	147
											1723	130
7	03/17/17	Pending		114							795	267
11	12/06/16	06/06/17		186	Pending	24					1239	249
											800	219
3	05/01/17	Pending		64							749	170
3	06/12/17	Pending		21							710	164
											805	164

DETAILED BREAKDOWN OF DURATION OF CASES *continued*

	Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTS to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
306.	448	03/26/13	01/26/17	1402	Pending	155							
307.	465	06/17/15	01/27/17	590	Pending	154							
308.	464	12/19/13	02/15/17	1154	Pending	135							
309.	466	04/17/15	02/24/17	679	04/19/17	54	Pending	72					
310.	468	09/16/15	03/20/17	551	Pending	102							
311.	TS30	03/14/14	03/20/17	1102	04/18/17	29	Case Closed by OSD on 4/18/17 for Insufficiency of Evidence						
312.	406	03/03/15	04/12/17	771	Pending	79							
313.	460	08/22/16	04/12/17	233	05/22/17	40							05/31/17
314.	482	11/27/15	05/11/17	531	Pending	50							
315.	488	09/20/15	05/11/17	599	Pending	50							
316.	436	02/19/16	05/22/17	458	06/19/17	28	Pending	11					
317.	474	06/21/15	05/24/17	703	Pending	37							
318.	478	12/18/15	06/07/17	537	Pending	23							
319.	405	03/05/15	06/29/17	847	Pending	1							
320.	483	06/17/14	06/30/17	1109	Pending	0							
Average Duration in Days				727		65		93		40		76	

**"Pending" means pending as of June 30, 2017.

Notes:

1. All data as of June 30, 2017. Includes all submitted cases (SAEs and RTSs), and as such averages may be skewed slightly downward because of cases that are pending in each stage (e.g., as of June 30, 2017, Case No. 478 had been with OSD for initial review for 23 days, but the initial review remained pending, such that the final number of days for this stage can be expected to be greater than the 23 currently shown as of June 30, 2017).
2. In cases with multiple respondents, the date given for (i) delivery of Notice, (ii) receipt of Response, (iii) date of extension and/or (iv) uncontested determination is the latest applicable date (e.g., if the Notice is delivered on three different dates to the three respondents in a case, the latest date is used). Also if at least one but not every respondent in a case appealed to the Sanctions Board, dates are given for both (i) receipt of Response; and (ii) uncontested determination (e.g., Case No. 427).
3. Four cases (Case Nos. 98, 100, 103 and 111) that were initially issued between July and September 2009 were reissued under the new Sanctions Procedures in March 2011 to permit constructive delivery. Since it relates to a delay in delivery, the intervening time has been attributed to the respondents, as have delivery delays under the new Sanctions Procedures.
4. For uncontested cases for which the Notice was issued to the Respondent on or after September 15, 2010, OSD issued a determination reflecting the imposition of the sanction recommended by the SDO in the Notice. For uncontested cases for which the Notice was issued prior to such date, the Sanctions Board issued a determination imposing the SDO's recommended sanction.

See the sanctions system website (www.worldbank.org/sanctions) for updated information and copies of recent Sanctions Board decisions and SDO determinations.

Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
											1557	155
											744	154
											1289	135
											805	126
											653	102
											1131	29
											850	79
9	06/14/17	Pending		30							312	79
											581	50
											649	50
											497	39
											740	37
											560	23
											848	1
											1109	0
12				139		51		309		309	1104	377

ANNEX B

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS

This detailed case-by-case breakdown shows the different types of fraudulent practice claims that have appeared in sanctions cases received from INT. First, a distinction is made between fraud cases that involve the forgery of third party documents and those that involve other types of fraud. Then, within each of these two streams, a further categorization is done to reflect the specific type of forgery or other fraud. For example, within the forgery stream, common instances are fraudulent bid securities, performance certificates and manufacturer's authorizations. Within the other stream, common instances are misrepresentations of experience, over-invoicing and failure to make required disclosures of conflicts of interest. The totals at the bottom of each column show how often INT has sent each such type of claim to OSD for decision-making.

SAEs and RTSs

	Case No.	Fraud								Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud							
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance				
1.	72			■			■			■			
2.	67	■											
3.	74		■						■				
4.	73									■	■		
5.	68				■								
6.	75									■			
7.	76								■				
8.	77										■		
9.	78			■									
10.	80			■									
11.	82			■									
12.	81					■					■		
13.	79			■									
14.	83			■									
15.	84			■				■					
16.	85			■									
17.	88	■						■		■			
18.	90			■									
19.	93			■									

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTs

	Case No.	Fraud								Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud							
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance				
20.	94			■			■						
21.	95						■	■	■				
22.	91	■											
23.	86			■									
24.	96			■					■				
25.	98			■			■						
26.	92							■			■		
27.	97			■			■						
28.	100			■			■						
29.	102			■			■						
30.	104								■				
31.	87			■									
32.	89			■									
33.	99			■									
34.	101	■			■				■				
35.	103			■			■						
36.	105			■									
37.	106			■									
38.	107			■									
39.	108						■						
40.	109			■			■						
41.	110	■											
42.	111			■									
43.	112				■								
44.	113		■										
45.	114					■					■		

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTSs

	Case No.	Fraud								Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud							
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance				
46.	115		■										
47.	117												
48.	118			■				■					
49.	119												
50.	TS1		■										
51.	TS2		■										
52.	116					■				■			
53.	120									■			
54.	124							■					
55.	122												
56.	121			■									
57.	123					■				■			
58.	125									■			
59.	128					■							
60.	127							■	■				
61.	136												
62.	137							■					
63.	131					■							
64.	135	■											
65.	138									■			
66.	130		■										
67.	134	■											
68.	139												
69.	143		■										
70.	129	■											
71.	142		■										
72.	132	■											

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTSs

	Case No.	Fraud								Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud							
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance				
73.	133								■				
74.	140							■					
75.	144							■					
76.	147								■				
77.	141	■											
78.	126							■			■		
79.	145								■				
80.	146								■				
81.	148		■										
82.	150						■						
83.	155						■						
84.	153		■										
85.	154							■					
86.	149		■										
87.	151								■				
88.	156		■										
89.	157								■				
90.	163		■										
91.	158		■										
92.	159			■									
93.	162	■											
94.	160		■										
95.	164		■										
96.	165		■										
97.	167							■					
98.	169	■							■				
99.	168								■				

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTSS

Case No.	Fraud									Collusion	Corruption	Obstruction	Coercion
	Forged Third Party Documents				Other Fraud								
	Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance	Other Fraud				
100.	171			■									
101.	166		■										
102.	161				■			■					
103.	172	■							■				
104.	174												
105.	175							■		■			
106.	176								■		■		
107.	177				■				■				
108.	178				■								
109.	173						■						
110.	179		■										
111.	152						■			■			
112.	181								■				
113.	182				■								
114.	180				■								
115.	TS3										■		
116.	183								■				
117.	187			■									
118.	186								■				
119.	185								■				
120.	170						■				■		
121.	188										■		
122.	TS4										■		
123.	190	■											
124.	195	■											
125.	194	■											

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTSs

Case No.	Fraud										Collusion	Corruption	Obstruction	Coercion
	Forged Third Party Documents				Other Fraud									
	Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance	Other Fraud					
126.	191										■			
127.	TS5												■	
128.	192									■				
129.	193	■												
130.	197		■											
131.	199									■				
132.	198									■				
133.	196	■												
134.	203	■												
135.	202				■	■				■				
136.	204	■		■										
137.	206											■		
138.	207									■				
139.	201									■				
140.	208											■		
141.	205	■												
142.	209	■												
143.	211						■						■	
144.	TS6												■	■
145.	189										■			
146.	213	■												
147.	216													
148.	214	■					■							
149.	210		■											
150.	184									■				
151.	212			■										

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTs

Case No.	Fraud									Collusion	Corruption	Obstruction	Coercion
	Forged Third Party Documents				Other Fraud								
	Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance	Other Fraud				
152.	247		■										
153.	254	■				■							
154.	TS7					■						■	
155.	256		■										
156.	244				■							■	
157.	255	■											
158.	200								■				
159.	257	■											
160.	249						■			■	■	■	
161.	258											■	
162.	215								■				
163.	267	■											
164.	269			■									
165.	268			■									
166.	259											■	
167.	273			■									
168.	261			■									
169.	248									■			
170.	264				■								■
171.	274									■			
172.	266								■		■		
173.	283							■			■		
174.	277									■			
175.	294			■			■						
176.	291			■					■				
177.	295				■								
178.	296			■									

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTSs

Case No.	Fraud										Collusion	Corruption	Obstruction	Coercion
	Forged Third Party Documents				Other Fraud									
	Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance	Other Fraud					
179.	301			■										
180.	281			■										
181.	TS8					■								
182.	270			■				■						
183.	302									■				
184.	276									■				
185.	303									■				
186.	309	■												
187.	260		■											
188.	262	■												
189.	322							■					■	
190.	315					■				■				
191.	317											■		
192.	318					■				■				
193.	323						■							
194.	321	■												
195.	299			■										
196.	293							■						
197.	TS9				■									
198.	TS10											■		
199.	TS11											■		
200.	326											■		
201.	TS12									■				
202.	313				■			■						
203.	325			■				■						
204.	305	■								■				
205.	306	■												

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTSs

	Case No.	Fraud								Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud							
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance				
206.	251									■		■	
207.	333			■				■				■	
208.	TS13											■	
209.	335								■				
210.	327		■										
211.	332		■										
212.	324								■	■			
213.	287				■						■		
214.	TS14			■									
215.	338			■					■	■			
216.	314				■								
217.	311							■					
218.	342	■											
219.	331										■		
220.	340			■									
221.	TS15										■		
222.	355		■										
223.	310										■		
224.	329				■						■	■	
225.	339					■			■				
226.	TS16					■							
227.	369								■				
228.	351			■									
229.	372					■					■		
230.	377										■		
231.	354				■			■					

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTSs

	Case No.	Fraud								Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud							
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance				
232.	383												
233.	352			■				■					
234.	357												
235.	TS18											■	
236.	TS17							■		■			
237.	348					■							
238.	347					■							
239.	349												
240.	368						■						
241.	364	■											
242.	376								■				
243.	375			■									
244.	387					■	■		■				
245.	393						■	■					
246.	TS19						■						
247.	397											■	
248.	392	■											
249.	TS20	■											
250.	359	■											
251.	365									■			
252.	395	■											
253.	389						■	■		■			
254.	399												
255.	400	■											
256.	356	■											
257.	TS22							■					

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTSs

Case No.	Fraud									Collusion	Corruption	Obstruction	Coercion
	Forged Third Party Documents				Other Fraud								
	Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance	Other Fraud				
258.	385			■									
259.	TS23						■						
260.	TS24						■						
261.	409										■		
262.	386										■		
263.	366	■											
264.	360			■									
265.	374										■		
266.	345					■		■	■		■		
267.	370									■			
268.	402			■									
269.	394										■		
270.	TS26						■						
271.	330				■				■		■		
272.	411							■					
273.	413						■						
274.	307								■		■		
275.	403			■									
276.	416		■										
277.	358						■				■		
278.	425						■	■	■		■		
279.	TS27						■						
280.	250				■						■		
281.	420						■						
282.	418						■						
283.	426						■					■	

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTs

Case No.	Fraud									Collusion	Corruption	Obstruction	Coercion
	Forged Third Party Documents				Other Fraud								
	Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance	Other Fraud				
284.	TS25												
285.	415				■								
286.	427										■		
287.	TS28					■							
288.	410					■							
289.	421					■	■				■	■	
290.	419								■				
291.	433					■							
292.	432										■		
293.	412									■			
294.	431	■		■			■		■	■	■		
295.	TS29				■								
296.	442					■	■			■			
297.	447						■			■			■
298.	453										■		
299.	391									■			
300.	454						■			■			
301.	434						■						
302.	446									■		■	
303.	456										■		
304.	443										■		
305.	463										■	■	
306.	448									■			
307.	465					■							
308.	464					■		■	■				
309.	466										■	■	

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

SAEs and RTs

Case No.	Fraud									Collusion	Corruption	Obstruction	Coercion
	Forged Third Party Documents				Other Fraud								
	Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance	Other Fraud				
310.	468							■	■	■			
311.	TS30					■							
312.	406								■				
313.	460	■											
314.	482		■			■			■	■	■	■	
315.	488									■	■	■	
316.	436						■		■				
317.	474					■				■			
318.	478									■			
319.	405								■				
320.	483				■						■		
Total Number of Instances	44	29	57	18	26	41	46	18	53				
Total Number of Forgery Cases vs. Other Fraud Cases	146				150								
Total Number of Cases by Type of Sanctionable Practice	260									34	69	19	2
Cases with more than 1 type of misconduct					53								

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

Settlements

		Fraud								Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud							
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance				
1.	Settlement					■							
2.	Settlement					■							
3.	Settlement					■			■				
4.	Settlement					■							
5.	Settlement					■							
6.	Settlement					■							
7.	Settlement					■							
8.	Settlement					■							
9.	Settlement					■							
10.	Settlement					■							
11.	Settlement									■			
12.	Settlement					■			■				
13.	Settlement								■				
14.	Settlement									■			
15.	Settlement									■			
16.	Settlement									■			
17.	Settlement				■								
18.	Settlement					■			■				
19.	Settlement								■				
20.	Settlement									■			
21.	Settlement									■			
22.	Settlement										■		
23.	Settlement											■	
24.	Settlement												■
25.	Settlement											■	
26.	Settlement					■							

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

Settlements

		Fraud								Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud							
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance				
27.	Settlement						■						
28.	Settlement							■					
29.	Settlement		■										
30.	Settlement						■						
31.	Settlement			■									
32.	Settlement				■								
33.	Settlement					■			■				
34.	Settlement			■					■				
35.	Settlement					■			■				
36.	Settlement				■	■		■					
37.	Settlement												
38.	Settlement												
39.	Settlement							■					
40.	Settlement												
41.	Settlement												
42.	Settlement			■				■					
43.	Settlement							■		■			
44.	Settlement					■							
45.	Settlement									■			
46.	Settlement		■										
47.	Settlement							■					
48.	Settlement							■					
49.	Settlement							■					
50.	Settlement							■		■			
51.	Settlement							■					
52.	Settlement					■			■				

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

Settlements

		Fraud								Collusion	Corruption	Obstruction	Coercion
		Forged Third Party Documents				Other Fraud							
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance				
53.	Settlement	■											
54.	Settlement			■			■	■					
55.	Settlement			■				■					
56.	Settlement						■						
57.	Settlement									■			
58.	Settlement						■						
59.	Settlement									■			
60.	Settlement									■			
61.	Settlement									■			
62.	Settlement									■			
63.	Settlement									■			
64.	Settlement									■			
65.	Settlement			■				■					
66.	Settlement										■		
67.	Settlement									■			
68.	Settlement				■								
69.	Settlement						■						
70.	Settlement							■		■			
71.	Settlement		■										
72.	Settlement						■						
73.	Settlement							■		■			
74.	Settlement									■			
75.	Settlement								■				
76.	Settlement									■			
77.	Settlement							■					
78.	Settlement			■									

DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS *continued*

Settlements

		Fraud								Collusion	Corruption	Obstruction	Coercion	
		Forged Third Party Documents				Other Fraud								
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance					Other Fraud
79.	Settlement								■					
80.	Settlement								■					
81.	Settlement										■			
82.	Settlement									■				
83.	Settlement								■	■				
84.	Settlement					■								
85.	Settlement	■												
86.	Settlement										■			
87.	Settlement								■					
88.	Settlement					■								
89.	Settlement								■					
90.	Settlement										■			
91.	Settlement									■				
92.	Settlement						■	■	■		■			
93.	Settlement					■	■		■					
94.	Settlement					■	■		■					
95.	Settlement						■							
96.	Settlement							■	■					
Total Number of Instances		2	3	7	5	20	21	18	12	20				
Total Number of Forgery Cases vs. Other Fraud Cases		17				69								
Total Number of Cases by Type of Sanctionable Practice		79								9	14	0	0	
	Cases with more than 1 type of misconduct						6							

Useful Web Links

www.worldbank.org/sanctions

www.worldbank.org/debarr

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