

State House, 107 North Main Street, Concord, NH 03301

ANDRU VOLINSKY
EXECUTIVE COUNCILOR
DISTRICT TWO

February 13, 2018

Governor Christopher T. Sununu, State House 107 North Main Street, Room 208 Concord, NH 03301

Attorney General Gordon MacDonald Department of Justice 33 Capitol Street Concord, NH 03301

Re: Questionable Business Practices of the State Liquor Commission

Dear Governor Sununu and Attorney General MacDonald:

I write to call to your attention to certain business practices of the New Hampshire Liquor Commission (SLC) that may be illegal and unquestionably facilitate money laundering related to criminal activities. These practices are also contrary to the example our state must set for responsible governance. The practices put our hard working state employees at risk for criminal prosecution or discipline and jeopardize revenues that support critical state programs benefitting our most vulnerable populations.

I believe these troubling practices have been ongoing for some time and predate our service in our respective positions as state leaders. However, this information has come to my attention, and I cannot ignore it. On behalf of my constituents and all the citizens of our state, I have a duty to report what I know to you. Please take immediate action to investigate these questionable practices and anyone who may be responsible for implementing or orchestrating them. I stand ready to assist in any way possible.

Below I have outlined the major areas of concern regarding SLC practices that appear designed to avoid federal financial reporting requirements related to large cash transactions.



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Illegal Bulk Sales Transactions in Cash

The SLC facilitates the practice of selling large quantities of liquor typically to out-of-state customers who drive to New Hampshire to make their purchases with significant quantities of cash in ways designed to avoid providing identifying information to federal authorities. The practice appears to currently focus on the sale of Hennessey cognac, although the sale of other liquors is also involved. For your frame of reference, the Commission sold approximately \$26 million in Hennessey cognac in FY 17.

Tracking the movement of cash through our economy is one way in which money laundering is discouraged by federal law enforcement. Money laundering is the process used to disguise the source of money or assets derived from criminal activity. Federal law requires businesses that receive more than \$10,000 in cash for their goods in any one transaction to report the receipt of cash on an IRS Form 8300 that identifies the person paying in cash. A sample IRS Form 8300 is attached at pages 1-2.

The SLC Policy Requiring Completion of IRS Form 8300 - and Practices that Circumvent it

The SLC has adopted a policy that requires the completion of IRS Form 8300 for sales over \$10,000 in a superficial effort to comply with applicable federal law. The SLC policy is attached at pages 3-4. The policy also prohibits structuring transactions to fall below the \$10,000 threshold (e.g., two people may not purchase \$18,000 in liquor by each person paying \$9000 in cash nor may one person go to two SLC stores to make two \$9000 purchases in cash). Failing to file an IRS Form 8300 for a sale over \$10,000 as well as breaking up a \$10,000 sale into smaller parts to avoid the filing requirement are both potentially federal crimes.

Despite the existence of this policy, the SLC has adopted practices that appear designed to undermine the policy and facilitate money laundering. A recent letter from the SLC to its employees purporting to explain the policy discourages the filing of IRS Form 8300 and accuses those who file with potentially engaging in discrimination. The letter is attached at page 5.

The SLC further facilitates cash bulk sales by maintaining inexplicably high inventories of Hennessey products at its stores that are conveniently located adjacent to the state's borders and near major highways for the benefit of out-of-state bulk cash purchasers. Attached are current inventories of Hennessey products that show a typical retail inventory for the 200 ml bottle ("half pints flasks") in a store to be about 50 bottles per store, yet stores in Bedford (1362), Keene (3000), and Londonderry (4020) have inventories of thousands of bottles in each store as indicated in the parentheses. See pages 6-7.



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Worse, the SLC prohibits its store managers from stocking this Hennessey item #307 on the retail shelves. The shelf planning function is centrally determined in Concord, not at the local store. If an item of liquor is intended for legitimate retail sales, one might ask why it is not stocked on shelves. I checked for this item at one of the I-93 Hooksett stores and, although the published inventory showed bottles in stock, none were on the shelves. The item was not on the shelves in Concord when I visited a store there or on the shelves in a Keene store.

Similar inventories exist with item #4638, a 375 ml bottle of Hennessey, where in-store or onorder inventories are exceptionally high for Bedford (2624), Hampton (2000), Keene (2004), Londonderry (3360), Manchester (2017), Nashua (1457), and Salem (1573). See pages 8, 9, 10.

The SLC maintains a centralized point of sale system for its cashiers and can track the quantity of sales and the methods of payment used for those sales. I am informed that you should review the record setting sales of the Keene store during the January 31, 2018 weekend because many of the transactions were in cash bulk sales. Indeed, an outside auditor may wish to review SLC data from all stores to determine the number of sales in each store that occur in an amount just under the \$10,000 reporting threshold. Correlating this data with store inventories of Hennessey may prove relevant to a determination as to whether the SLC is complicit.

As a result of the large cash transactions on the weekend of January 31, 2018, the Keene store employees made bank deposits of more than \$100,000 in cash, placing them at great risk for robbery. There is no security for the employees who make cash deposits and the state does not utilize an armored car service.

These cash bulk sales transactions create criminal issues for the cashiers who see the purchasers come to the store in pairs or small groups and then divide up the liquor purchases among themselves to avoid the \$10,000 threshold. Often cash bulk sales customers have already made purchases at other stores. Recently, I am given to understand that SLC employees were instructed to avoid looking inside the trucks and SUVs driven by the cash bulk sales purchasers to avoid learning that the customer has already purchased cases of liquor at other SLC stores. Why? Because an SLC employee seeing dozens of cases of SLC product already in the back of an out-of-state truck might become suspicious of illegal bulk cash transactions and report same to Concord. As I have learned, this is something that both the SLC and out-of-state bulk cash buyers apparently wish to avoid. I also understand that the SLC has installed cash counting machines in some of its stores to facilitate the processing of cash. This is another indication of the awareness of the problem by the SLC central administration.



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Personal Observation of a Cash Bulk Sales Transaction

On Saturday, February 3, 2018, I personally witnessed a cash bulk sales transaction that appeared designed to avoid reporting requirements. A woman named Anna called the store and asked the staff to pull together an order for her totaling over \$24,000. Her purchase was almost exclusively of Hennessey products. Later that same day, Anna arrived at the store with a man. The two asked that their purchase be moved to the cash register. I observed the man remove a very large wad of cash from his pocket and give approximately half of it to Anna. The male and Anna then used the cash to each make purchases just under the \$10,000 threshold, with the remainder of the transaction - about \$5-6000 - purchased on the male's credit card. Although the SLC now has the male's credit card information, the IRS does not have any indication that Anna and the man with her trafficked in almost \$20,000 in cash because, based on my direct observations, they successfully structured their transaction to avoid reporting. Enclosed at pages 11, 12, 13 and 14 are a photo of the list that Anna called in, the items that she ordered loaded on hand trucks, Anna and her male companion, and the license plate of the vehicle into which Anna and the male loaded the purchase.

What I personally observed on February 3, 2018 confirmed what I had been told; that is, that cash bulk sales transactions appear to be done openly, are widespread and the practice is long running. The practice is facilitated by SLC controlled inventory practices.

The employee who assisted me on February 3, 2018 deserves to be treated as a whistleblower pursuant to RSA 275-E. It would be highly inappropriate for the SLC or any other state agency to target this employee for discipline.

Hennessey Sales are Not Advertised In Stores

The SLC has a process of advertising discounts of merchandise in stores, but discounts of Hennessey are not advertised. The SLC central administration in Concord directs store personnel to post pink tags on shelves when certain liquors are on sale. Although printed locally in the store, the Commission conveys the information about the pink signs to the local stores via computer. While many of the Hennessey products were on sale on the weekend of February 3rd, when I was in the store, the store had not been provided with pink tags to announce the sale of Hennessey. Pages 15 and 16 are photos of the Hennessey products without pink sale tags and of another cognac with its sale tag displayed.



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If the liquor is on sale to the public, one must ask why sales are not encouraged through in-store signage. I have reason to believe the answer is that inventory is being held back to favor the customers that engage in cash bulk sales. Many of the Hennessey products currently remain on sale. The failure to post the pink sale tags was also evident at the I-93 Hooksett store and at a Concord store where I also checked on February 9th and 10th.

Promotional Gift Cards are Misused

The SLC periodically engages in a promotion in which a buyer who purchases \$150 in sales is given a Liquor Commission gift card, which may be used as cash, in the amount of \$25.00. The promotion is so popular that the Commission instituted a VIP gift card of \$250 for purchases of \$1500. The cash bulk sales customers get advance notice of these promotions before store personnel and before the general public. This raises additional questions about the potential level of coordination between SLC personnel and cash bulk purchasers. Not surprisingly, I am given to understand that lines of cash bulk sales customers form outside of stores when the promotions begin.

Cash bulk sales customers come to the stores with accomplices and each buys \$1500 of liquor and each is given a VIP card. This group then moves to another liquor store and each member uses the \$250 VIP card, plus \$1250 in cash to buy liquor and to earn yet another VIP card. The group then goes to a third store and uses the VIP card (which was now provided for a \$1250 cash purchase) with cash to receive yet another VIP card and so on in an ever diminishing return to the SLC.

The use of these SLC-provided cards not only facilitates these questionable bulk cash transactions, but unbelievably provides a state discount to the customers who are illegally structuring the transactions. I believe a forensic auditor may be able to determine the use of gift cards from the Commission's point of sale records.

Conclusion

Based on what has been told to me by whistleblowers at the SLC and what I learned through my own personal observations, I believe the following:

• That the state – through the SLC – is facilitating potentially illegal cash bulk sale transactions in violation of federal law. It would be a straightforward matter to seek a revenue ruling from the IRS to determine if the state is in compliance with federal law or not. (I am aware the state has commissioned opinion letters in the past from assistant



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attorneys general and former assistants regarding the applicability of IRS regulations to the operations of the SLC, but the state has never sought a ruling from the IRS that would remove any questions about the legality of SLC practices);

- That notwithstanding the legal application of a reporting requirement, it is clear that our state is profiting from cash bulk transactions where at least some of the cash is likely coming from illegal trafficking, whether in drugs, guns or humans. The stories are widespread of customers arriving at stores in out-of-state trucks and SUVs with wads of cash stuffed into their pockets, money belts and socks;
- Any claim to the legitimacy of these out-of-state customers is undermined when one considers that these customers are actively arranging their cash bulk sales to fall below the federal \$10,000 threshold to avoid reporting requirements. This is hardly the behavior of reputable businesses. Whether the SLC is actively facilitating these types of transactions or simply turning a blind eye, our state should not be in the business of profiting from cash bulk transactions where the money likely comes from illicit activity. This presents both ethical and financial issues for our state;
- These cash bulk sales practices place our hard working state employees at risk for criminal prosecutions or robbery; and
- These practices expose New Hampshire to potential suits from neighboring states for facilitating efforts to avoid their taxation schemes.

While these facts alone are alarming enough, I have every reason to suspect a more thorough review of SLC practices may result in even more troubling revelations. Given the circumstances, I suggest the retention of an outside forensic auditor to assist the Attorney General in an investigation. The SLC, obviously, cannot investigate itself.

The SLC's highly questionable practices may not have begun on our collective watch, but we are now aware of them. Our response and review must be immediate, thorough and non-partisan. The issues at stake concern fundamental questions of right and wrong. We must ensure that our citizens have the type of reliable, honest government they deserve.



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I stand ready to assist in any way. Thank you for your prompt attention to this troubling matter.

Sincerely,

Andru Volinsky 603.491.0376

Senate President Charles Morse cc:

House Speaker Gene Chandler Executive Councilor Joseph Kenney

Executive Councilor Russell Prescott

Executive Councilor Christopher Pappas

Executive Councilor David Wheeler

IRS 8300

(Rev. December 2004)

OMB No. 1545-0892 Department of the Treasury Internal Revenue Service

Report of Cash Payments Over \$10,000 Received in a Trade or Business

► See instructions for definition of cash.

FinCEN 8300 Form 8300 (Rev. December 2004) OMB No. 1508-0018 Department of the Treasury Financial Crimes Enforcement Network

Use this form for transactions occurring after December 31, 2004. Do not use prior versions after this date.
 For Privacy Act and Paperwork Reduction Act Notice, see page 5.

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New Hampshire Liquor Commission

50 Storrs Street, P.O. Box 503 Concord, N.H. 03302-0503 (603) 230-7026



POLICY AND PROCEDURE

Policy Number:	F-112			
Issue/Reissue Date:	03/23/2015			
Topic:	Finance/Store Operations Large Volume Sales			
Amends/Supersedes Policy No/Date:	Store Operations Manual Cash Control and Security 2-11 Original Effective Date: September 29, 2006; Revision: August 17, 2012			
Distribution:	All NHLC Employees			
Purpose:	Cash, Product, and Risk Management Control			
Policy:	Large Volume Sales Policy			

I. POLICY STATEMENT:

The Commission is committed to maintaining high legal, ethical, and moral standards. It is determined to promote a culture of honesty and prevention of fraud, criminal conduct, and loss prevention. All employees of the Commission are expected to share this commitment which is identified within our mission statement of the Commission.

II. PURPOSE:

The New Hampshire State Liquor Commission ("Commission") recognizes the importance of sound management practices as they relate to store operations for protecting the State of NH, the NHSLC, the employees, and customers. This policy is intended to provide management of Large Volume Sales for our Customers. Failure through omission to follow and abide by these requirements may result in adverse personnel action up to and including dismissal under the New Hampshire Division of Personnel rules.

III. POLICY:

Integrity, respect, and professionalism are the values for all NH Liquor Commission employees. All NHSLC employees are expected to embrace and adhere to them while carrying out the mission. Furthermore, all employees are expected to be forthright, honest, and truthful with those they come in contact with whether it is the staff of other agencies, the general public or colleagues from within the Commission. All employees will interact with members of the public, co-workers, and management in positive, supportive, and cooperative way.

• Any retail sales transaction must transpire during the normal business hours of the particular store.

- All retail sales, regardless of the volume, must be processed at the cash register in a manner similar to the accepted practice.
- When processing a Large Volume Sale two (2) employees must each individually count cash and bottles at the cash register when a transaction is processed prior to the customer exiting the Retail and Outlet Store.
- Store personnel may answer customer inquiries via telephone regarding current or upcoming sales and product pricing.
- The distribution of any internal NHSLC Marketing documents (electronic or paper) to anyone not employed by the NHSLC is prohibited.
- NHSLC employees will not disseminate any information to their customers regarding the presence of local or state law enforcement personnel in the area of, or on the routes leading to or from, any of our stores.
- All customers that purchase a volume of product totaling \$10,000.00 or more in cash, either through one or multiple related transactions, must complete IRS Form 8300 in its entirety before the sale is processed through the cash register, using one of the forms of identification for the customer that is a currently acceptable form of identification for the purchase of product in our stores (valid driver's license, passport, military ID). The Store Manager or the person in charge will complete Part I through Part III of the IRS form 8300. This information must be printed neatly!
- Cash is defined as US or foreign currency, cashier's check, money orders, NHSLC gift cards or any pre-paid gift card, bank drafts or traveler's checks.
- Completed forms should be forwarded to the NHSLC Store Operations, attention Store Operations Program Assistant, by the store where the purchase was made at the close of business on the day of the transaction(s).
- No New Hampshire State Liquor Commission Employee shall accept any gratuities connected to large volume sales.
- All stores are to service customer requests for all large sales and follow these guidelines.

NOTE: As outlined in NHSLC policy F-103 CASH HANDLING, all sales are to be handled at the cash registers. ONLY licensees will have the option of receiving product through the rear door if the store can safely accommodate the request. All other sales are to leave the store through the front door.

New Hampshire Liquor Commission



50 Storrs Street, P.O. Box 503 Concord, N.H. 03302-0503 (603) 230-7026 Joseph W. Mollica Chairman

Michael R. Milligan Deputy Commissioner

The Commission has recently received a number of IRS Form 8300's. <u>None</u> of the forms were for a sale greater than \$10,000 as required by law. We are also aware of some stores requiring forms for "suspicious transactions" without providing any proof of illegal activity and the Commission has received information that our retail staff is profiling customers and sending the information to other stores even when the transaction is not a cash sale. These possible discriminatory acts do not comply with the law and must cease immediately.

Our business is predicated on customer service and each customer should be treated fairly and with respect. Transactions should be performed uniformly throughout our stores.

Please be advised of the following:

- 1. A Commission employee is NOT AUTHORIZED to profile customers or send videos, photos or physical descriptions of customers from one store to another. If you have a concern that you can articulate or document, please forward that to the loss prevention officer or the administrator of store operations.
- 2. A Commission employee is NOT AUTHORIZED to check off the box that a transaction is suspicious unless you can provide facts to back up your knowledge or belief. Someone "looking" suspicious is not enough. The IRS defines a "suspicious" transaction as one:
 - a. where a person is trying to cause you not to file Form 8300; or
 - b. where a person is trying to cause you to file a false or incomplete Form 8300; or
 - c. where there is a sign of possible illegal activity.
- 3. A Commission employee should not complete an IRS form 8300 for sales of \$10,000 or <u>less</u>, unless you know, or have reason to know, that each sale is one of a series of connected transactions AND the aggregate sales exceeds \$10,000.
- 4. Transactions made beyond the 24 hour period are <u>NOT</u> related if there is a completely new purchase and you have no reason to believe that it is part of a series of connected transactions.
- 5. Please remember that the requirement to complete an IRS Form 8300 only applies to CASH (currency) sales only. It is not applicable when personal checks, debit cards, and credit cards are used by a customer in order to pay for the sale.

Any employee with a question or scenario they would like clarified should contact me or their area supervisor. Thank you.









Always Great Value, Always Great Selection!

WIME

SPIRITS

SALES & PROMOS

EVENTS

LEARN & ENTERTAIN

On Order*

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STORES

ABOUT NHLC

Search our stores for a product

enter product name or #

Search

Home / Search Results / Product Details



WE ALSO RECOMMEND...

Remy Martin Vsop (200mL)

Courvoisier Vs Cognac (200mL)

HENNESSY VS COGNAC

Size: 200mL

Sale Price: \$8.99

Add To Favorites

Regular Price: \$9.99 Savings: \$1.00

Sale Ends: 02/25/2018

Item Number: 307 Type: Brandy Imported Category: Cognac

Inventory* Store Bedford (#55), 9 Leavy Dr 1362 Brookline (#22), 44a Route 13 24 Derry (#20), Derry Meadow Shoppes 67 491 Hampton (#76), Interstate 95 North Hampton (#73), Interstate 95 South 18 286 Hooksett (#67), 25 Springer Road Jaffrey (#36), Monadnock Plaza 18

3000 Keene (#15), 6 Ash Brook Court 3 Lebanon (#11), 12 Centerra Parkway 4020 > Londonderry (#61), 137 Rockingham Rd

Manchester (#33), North Side Plaza

Londonderry (#74), 5 Garden Lane 1 408 Manchester (#10), 68 Elm St 303 2208

0 Merrimack (#59), Merrimack Shppng Ctr 3 Nashua (#50), Willow Spring Plaza 60 0 Nashua (#32), 40 Northwest Blvd 144 5 0 Newport (#24), Sugar River Shop Ctr

Pembroke (#81), Pembroke Crossing Pl 49

^{*}Numbers reflect inventory available at close of business yesterday. Please call the store to check exact quantities.

Store	Inventory*	On Order*
Peterborough (#21), Peterboro Plz Ste 1	15	0
Plaistow (#49), Market Basket Plz	15	480
Rindge (#77), Chesire Mkpl Unit 7	482	0
Salem (#34), Rockingham Mall	365	528
Seabrook (#41), Southgate Plaza	3	0

^{*}Numbers reflect inventory available at close of business yesterday. Please call the store to check exact quantities.

SIGN UP & SAVE!

enter email address

sign up

For exclusive savings on your favorite wines and spirits, sign up for Email Extras today.

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PLEASE DRINK RESPONSIBLY

Login | Create Profile | Gift Cards | Order Wine









Always Great Value, Always Great Selection!

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SPIRITS

SALES & PROMOS

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LEARN & ENTERTAIN

STORES

ABOUT NHLC

Search our stores for a product

enter product name or #

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HENNESSY VS COGNAC FLASK

Size: 375mL

Sale Price: \$16.99

Add To Favorites

Regular Price: \$17.49 **Savings:** \$0.50

Item Number: 4638 Type: Brandy Imported

Sale Ends: 02/25/2018 Category: Cognac

Like 0

WE ALSO RECOMMEND...

Hennessy Round Vs Cognac (375mL)

Hennessy Black Cognac (375mL)

Remy Martin Vsop (375mL)

	Store	Inventory*	On Order*	
>	Bedford (#55), 9 Leavy Dr	-16	2640	
	Belmont (#75), 12 Old State Rd	6	0	
	Berlin (#5), Iga Plaza	20	0	
	Brookline (#22), 44a Route 13	132	0	
	Campton (#65), Ctr At Campton Cornr	10	0	
	Center Harbor (#12), 12a Main St	4	0	
	Center Ossipee (#57), Indian Mount Shp Ctr	9	0	
	Claremont (#8), 367 Washington St	8	0	
	Colebrook (#18), 151 Main St	6	0	
	Concord (#72), 100 Fort Eddy Road	6	0	
	Concord (#1), Capitol Shopping Ctr	16	0	
	Conway (#23), 234 White Mtn Hwy	17	0	
	Derry (#20), Derry Meadow Shoppes	70	0	
	Dover (#9), 47 Chestnut St	15	0	
	Epping (#79), 5 Brickyard Sq	48	0	
	Farmington (#43), 829 Nh Rte 11	12	0	
	Franklin (#17), Franklin Shopping Ct	11	0	

^{*}Numbers reflect inventory available at close of business yesterday. Please call the store to check exact quantities.

	,		
	Store	Inventory*	On Order*
	Gilford (#56), 18 Weirs Rd	18	0
	Glen (#54), Patchs Market Place	12	0
	Goffstown (#58), Shop N Save Plaza	68	0
	Gorham (#52), Androscoggin Plaza	10	0
	Groveton (#26), Northumberland Ctr	19	0
	Hampstead (#78), 416 Emerson Avenue	18	0
->	Hampton (#76), Interstate 95 North	13	1188
	Hampton (#73), Interstate 95 South	26	84
	Hillsboro (#35), 15 Antrim Road	23	0
	Hinsdale (#48), Route 119	267	216
	Hooksett (#66), 530 West River Rd	58	12
	Hooksett (#4), 1271 Hooksett Rd	32	0
	Hooksett (#67), 25 Springer Road	21	120
	Hudson (#53), Market Basket Plaza	50	12
	Jaffrey (#36), Monadnock Plaza	46	0
->	Keene (#15), 6 Ash Brook Court	2004	0
	Lancaster (#37), Butsons Marketplace	6	0
	Lebanon (#11), 12 Centerra Parkway	5	0
	Lee (#71), 60 Calef Highway	13	0
	Lincoln (#47), Lahout Shop Plaza	3	0
	Littleton (#7), Globe Plaza Rte 302	4	0
	Londonderry (#61), 137 Rockingham Rd	81	2784
	Londonderry (#74), 5 Garden Lane	19	492
_>	Manchester (#10), 68 Elm St	1537	480
	Manchester (#3), Mnchstr-bstn Airprt	18	0
	Manchester (#33), North Side Plaza	19	0
	Manchester (#31), East Side Plaza	49	0
	Meredith (#42), 71 Rte 104 Unit 3	24	0
	Merrimack (#59), Merrimack Shppng Ctr	40	12
	Milford (#30), Market Basket Plaza	7	0
	Nashua (#50), Willow Spring Plaza	16	48
	Nashua (#69), 25 Coliseum Ave	24	48
<i>→</i> >	Nashua (#32), 40 Northwest Blvd	233	1224
,	Nashua (#27), Market Place Plaza	3	0
	New Hampton (#44), 325 Nh Route 104	19	0
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 $^{{}^*}Numbers$ reflect inventory available at close of business yesterday. Please call the store to check exact quantities.

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Store	Inventory*	On Order*					
New London (#64), New London Shpg Cntr	8	0					
Newport (#24), Sugar River Shop Ctr	13	0					
North Hampton (#68), Village Shopping Ctr	71	12					
Pelham (#51), Route 38	8	24					
Pembroke (#81), Pembroke Crossing Pl	36	0					
Peterborough (#21), Peterboro Plz Ste 1	27	0					
Pittsfield (#45), 6 Water Street	7	0					
Plaistow (#49), Market Basket Plz	2	360					
Plymouth (#19), 22 Ridge View Lane	7	0					
Portsmouth (#6), Portsmouth Plaza	86	0					
Portsmouth (#38), Portsmouth Trfc Crcl	21	12					
Raymond (#62), Raymond Shpng Ctr	24	0					
Rindge (#77), Chesire Mkpl Unit 7	12	0					
Rochester (#14), Lilac Mall	0	12					
Salem (#34), Rockingham Mall	-23	1596					
Seabrook (#28), 186 Ocean Blvd	23	0					
Seabrook (#41), Southgate Plaza	18	0					
Somersworth (#13), 5 Somersworth Plaza	13	0					
Stratham (#25), Kings Highway Plaza	16	12					
Swanzey (#70), Wilber's Marketplace	28	0					
W. Chesterfield (#2), 100b Route 9	123	0					
Walpole (#40), 32 Ames Plaza Lane	7	0					
Warner (#82), 14 Nichols Mills Ln	34	0					
West Lebanon (#60), 10 Benning St	46	0					
Whitefield (#29), 100 Lancaster Road	5	0					
Winchester (#63), 30 Warwick Rd	14	0					
Wolfeboro Falls (#39), 35 Center St	14	0					
Woodsville (#16), Butson's Complex	11	0					

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