



GRANT ASSISTANCE PROGRAM

*2002 Herman Goldstein Award for
Excellence in Problem-Oriented Policing*

DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL

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April 23, 2002

Herman Goldstein Award Selection Committee
Police Executive Research Forum
1120 Connecticut Avenue., NW, Suite 930
Washington, DC 20036

Dear Herman Goldstein Award Selection Committee:

The Department of Alcoholic Beverage Control (ABC) is responsible for licensing and regulating over 72,000 licensed premises in California. Our mission is to fulfill our law enforcement responsibilities in a manner that fosters and protects the health, safety, welfare, and economic well being of the people of the State.

In keeping with this mission, the Department has developed the Grant Assistance Program (GAP) to broaden the base and increase the level of alcoholic beverage law enforcement in California by working in partnership with cities and counties. ABC has developed effective strategies for dealing with alcohol-related problems through a number of education, prevention, and enforcement programs.

The GAP Program is designed to assist law enforcement agencies target those premises that contribute disproportionately to problems within the community. The GAP Program offers suggestions for a multi-disciplinary strategy in responding to disorderly and disruptive licensed premises.

The GAP Program epitomizes the four ideals of problem oriented policing through use of the four-stage SARA problem-solving model. The results detailed in the attached application award submission are accurate and attributable to the GAP Program. Therefore, I hereby nominate the Department of Alcoholic Beverage Control Grant Assistance Program for the Herman Goldstein Award.

Sincerely,

A handwritten signature in black ink, appearing to read "Mandel R. Espinoza".

Mandel R. Espinoza
Interim Director

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Attachment

STATE OF CALIFORNIA
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL
GRANT ASSISTANCE PROGRAM

SUMMARY:

The Problem: In the early 1990's, budget reductions at the State and local level reduced resources for alcohol-related crime enforcement. Many local law enforcement reassigned officers to other areas such as street patrol and violent crime suppression. As the number of problem alcohol outlets increased, a strong movement by cities, communities and the Governor's Anti-Crime Initiative called for more rigorous enforcement. There was a need to control the alcohol outlets that had become focal points for crime.

Analysis: The State of California Department of Alcoholic Beverage Control (ABC) formed a team to analyze the cause of problem outlets and to develop a solution. ABC determined that there was no effective enforcement strategy that existed for addressing, controlling and preventing the increasing number of problem outlets. Further analysis revealed that many of the problems occurred because (a) business owners were unaware of their responsibilities to maintain a lawfully operated establishment, (b) sufficient laws were not in place to hold business owners responsible for nuisance activities outside their business, (c) community partnerships needed to be strengthened, and (d) local law enforcement did not always have the expertise or resources to deal with the problem.

Response: ABC developed a new approach to broaden and increase the level of alcoholic beverage law enforcement by implementing the Grant Assistance Program (GAP). The goal was to develop an effective, comprehensive, and strategic approach to eliminating the crime and public nuisance problems associated with problem outlets, then institutionalize those approaches within local police agencies. Individual agencies receiving grants of up to \$100,000 would be able to implement this strategy through a

variety of innovative project objectives. These include training of law enforcement personnel, community involvement, prevention, enforcement, records management and data systems, liaison with the ABC District Offices, and media advocacy.

Assessment: The GAP Program's success can be measured quantitatively by *the* reduction in alcohol-related arrests, crimes, and calls for services in many jurisdictions. Further quantitative measures include the number of accusations¹ registered, arrests and citations, decoy programs, and community outreach meetings. In addition, the working relationship between ABC and local law enforcement agencies in California has strengthened and innovative preventive and enforcement strategies have been developed. The main success of the program has been its effectiveness in improving conditions in communities impacted negatively by liquor stores and bars.

¹ *A formal charge against a licensee alleging grounds for suspension or revocation of the ABC license*

PROGRAM DESCRIPTION

SCANNING

The Department of Alcoholic Beverage Control (ABC) is the State agency that regulates the alcohol industry in California through licensing and enforcement. In the early 1990's budget reductions at the State and local level greatly reduced law enforcement personnel assigned to ABC enforcement. Many of the State's police and sheriffs departments re-prioritized their missions and diverted ABC-related enforcement to other areas such as violent crime suppression and street patrol. The overall crime problem in California was identified by then Governor Pete Wilson, who put into place an Anti-Crime Initiative.

As of June 30, 1994, there were 71,381 ABC licenses in the state. A total of 67,068 were retail outlets such as liquor stores, bars, restaurants, and other businesses. In 1994, ABC was staffed with only 181 sworn investigative positions statewide. There was a strong movement by cities and communities for stronger law enforcement control of alcohol outlets that had become focal points for crime.

Nationally, the costs associated with alcohol-related crimes is estimated in the billions of dollars. The cost of underage drinking is over \$52 billion annually as a result of violent crime, traffic collisions, burns, drowning, suicide attempts, alcohol poisoning and alcohol abuse treatment. This equates to \$266 per year for every man, woman and child in the United States¹. Local law enforcement recognized that the problems associated with disorderly and disruptive licensed outlets required additional resources and expertise. Due to the complexity of ABC law, officers did not have a full understanding of the rules and regulations of the ABC Act.

ANALYSIS

On July 26, 1994, ABC responded to the Anti-Crime Initiative by organizing a

¹ Costs of underage drinking. David T. Levy, Ted R. Miller, and Kenya C. Cox. U.S. Department of Justice. Office of Justice Programs, Office of Juvenile Justice and Delinquency Prevention. Pacific Institute for Research and Evaluation. Rockville MD. October 1999.

Project Team. The team's charter was to analyze the crime problems associated with licensed outlets and some solutions. The Project Team consisted of Carl DeWing, Forrest Frazier, Terri Mason, Lauren Tyson, and the Project Manager, Jerry Jolly.

Problem alcohol outlets can have a varied and widespread negative effect on the surrounding community. About five percent of all licensees contribute disproportionately to the crime problem by violating ABC laws and being disruptive to the community. Problem retail outlets, even though they are a small percentage of the total, become magnets for crime and the "broken windows" in our communities. Unless fixed quickly, they become the norm and deteriorate the quality of life in our neighborhoods.

Communities with a high concentration of alcohol outlets experience a greater number of alcohol-related problems. Problem outlets contribute to drug dealing, public drunkenness, drunk driving, underage drinking, assaults, and other conditions that breed neighborhood decay. Excessive complaints and calls for service at problem outlets divert already scarce police resources. One study suggests an ecological association between rates of assaultive violence and alcohol outlet density in Los Angeles County. The study showed that in a model community of 50,000 residents and 100 alcohol outlets, for every 10 percent increase in the number of outlets, 25 new violent crimes associated with that density could be predicted'.

The Project Team analyzed the problems associated with licensed outlets and determined many of the problems occurred because (a) licensees were unaware of their responsibilities to maintain a lawfully operated business, (b) sufficient laws were not in place to hold licensees responsible for nuisance activities outside their business, (c) community partnerships needed to be strengthened, and (d) law enforcement did not always have the expertise or resources to deal with the problem.

Richard Scribner, M.D., M.P.H., "The Risk of Assaultive Violence Associated with Alcohol Outlets in Los Angeles County: An Ecologic Analysis," Oct. 1993.

Prior to the GAP Program most contacts between ABC, local public agencies, and community groups concerning licensed outlets generally occurred on a case-by-case basis. There was no systematic pro-active strategy to address alcohol-related problems at the point of sale on a community-wide scale. There was not any structured training (other than at police academies and periodic roll call training) for local law enforcement about the complexities of ABC laws. Additionally, due to a lack of effective reporting systems at the local law enforcement level, disruptive premises did not come to ABC's attention until they were a major problem for the community; i.e., "out of control." Analysis further revealed that problem outlets were not limited to any particular community or demographic area. The problem was statewide and pervasive, and one that presented huge challenges to, and drained the resources of, local law enforcement.

RESPONSE

The information collected by the Project Team resulted in a comprehensive action plan designed to reduce alcohol-related crime throughout the State. The plan involved working in partnership with cities and counties through a grant assistance project. The Grant Assistance Program (GAP) was the first time in its then 39-year history that ABC had provided grants to local law enforcement agencies. Up to that point, law enforcement agencies received grants from the California Office of Traffic and Safety, the California Office of Criminal Justice Planning, or other funding sources. However, the focus of prior grants to law enforcement had not generally been aimed at problem alcohol outlets. The Project Team determined that local law enforcement knew best what their problems were and that they lacked funding, in many cases, to address the problems. The Project Team proposed awarding grants of up to \$100,000 to local law enforcement agencies.

With the formation of the Project Team in July of 1994, the plan to implement the new GAP Program was set into motion with a goal of program implementation by January 1, 1995. The following objectives were accomplished within a short, five-month

period:

1. Develop and send a memorandum soliciting ABC investigator applications for project positions by August 15, 1994
2. Develop a method to keep our Division, District and Branch Offices and Headquarters Supervisors apprised of the project by August 15, 1994
3. Develop the Request for Proposal (RFP) package by September 1, 1994
4. Identify the equipment needs for the six ABC investigators assigned to the project *by* September 1, 1994
5. Identify the office space needs for the six ABC investigators assigned to the project by September 1, 1994
6. Send the Request for Proposal to local law enforcement agencies by September 15, 1994
7. Hold a news conference by September 15, 1994
8. Prepare a project management structure chart by September 30, 1994
9. Hold two bidder's conferences to answer questions from prospective grantees by September 30, 1994
10. Develop a policy and procedures manual for ABC staff by October 1, 1994
12. Hire an associate governmental program analyst for the project by October 15, 1994
13. Receive proposals from local law enforcement agencies by October 22, 1994
14. Complete a project manual for grantees by October 15, 1994
15. Review and score proposals from local law enforcement agencies by October 22, 1994
16. Send notifications by October 22, 1994
17. Submit the grantee contracts to General Services Legal for review by November 1, 1994

18. Develop a training course for ABC investigators assigned to the project by November 1, 1994
19. Obtain authority to hire two office support staff members (one for each Division) by December 1, 1994
20. Conduct a training course for ABC investigators assigned to the project by December 1, 1994
21. Develop a training course for local law enforcement officers assigned to the project by December 1, 1994
22. Develop a records management system for the project by December 1, 1995
23. Develop a mailing list for the project by January 1, 1995
24. Fund the grants by January 1, 1995

In determining where funding was needed, the GAP Program required applicants to submit proposals. The proposals included a proposal cover sheet, project narrative, budget estimate, and list of other funding sources. In their project narrative, grant applicants were required to include a problem statement that clearly identified the area to be served, the specific problems the project would address, why current resources were not meeting the need, how the applicant would address the problem through ABC funding, and the impact the project would or should have on the problem. Further, the problem statement includes:

- A demographic description of the target area(s), including economic composition and significant social and crime factors.
- Whether the local city attorney/district attorney prosecutes underage purchasers as well as persons who furnish or sell alcoholic beverages to underage persons.
- Information about ABC outlets, including the number of outlets in the jurisdiction and whether any are disorderly, disruptive, require an inordinate amount of police services and/or result in community concerns or complaints; and how these problem

outlets were identified (i.e., number of calls for service, complaints, data from treatment centers, schools, arrests for driving under the influence of alcohol (DUI), etc.) and attempts to solve the problem.

Applicants were also required to outline specific objectives. The proposals were then rated and evaluated by a Selection Review Committee. The committee consisted of the Department's Northern and Southern Assistant Directors and representatives from both the California Highway Patrol and State Office of Criminal Justice Planning. Proposals were rated on a point system.

In its selection criteria, ABC allowed for priority consideration to projects that operated in a high-crime area, that represented the state geographically, in medium to large population areas so that as many persons as possible could benefit, in rural areas, or where there was a demonstrated need. ABC also gave consideration to demonstrated experience working with ABC and the ability to have cooperative working relationships with stakeholders. The ABC Director would make the final selections for funding. ABC intended to accomplish the following goals with the GAP Program:

- (1) Achieve the goals and objectives as outlined in the grant agreements
- (2) Establish a close working relationship between the ABC District Office and the local law enforcement agency
- (3) Prioritize law enforcement efforts and target those licensed outlets that are disruptive and disorderly
- (4) Develop a records management system to ensure police reports are systematically sent to the ABC District Office as required by law
- (5) Assist in the training of local law enforcement

Primary resources came from ABC investigators assigned to the program. Funding came from ABC's reserve fund along with special legislation signed into law to augment the Governor's Anti-Crime Initiative. Funding for the initial 1995 project totaled \$2.4 million.

In January of 1995, 25 agencies were awarded grants of up to \$100,000. Those agencies were sheriffs and police departments from: Alameda County, Anaheim, Chico, Chino, El Cajon, Fresno, Gardena and Hawthorne (combined grant), Inglewood, Kern County, Long Beach, Los Angeles, Modesto, Monterey County, Oakland, Porterville, Sacramento County, Sacramento, San Bernardino, San Diego, San Jose, Santa Ana, Stanislaus County, Stockton, and Ventura County. Since January of 1995 to June 2001, ABC has awarded grants to 145 local law enforcement agencies, totaling \$11.4 million.

ABC developed the GAP Unit to make the program a success. The GAP Unit was originally comprised of Jerry Jolly, Project Manager; Patsy Tomasello, Grant Coordinator; Supervisors for the Special Operations Units in Northern and Southern California; and six investigators (new positions) to act as liaisons for the grant agencies.

To achieve the individual project goals, the GAP program combines education, prevention, and enforcement in a "full-court press." The program itself is unique. We know of no other liquor control agency that provides grants to local law enforcement. The GAP Program differs, from other grant programs in that it focuses on enforcement and prevention at the point of sale. The program meets the needs of the target population by empowering individual local law enforcement agencies in finding solutions to the problems unique to their communities. Individual grant agencies have many innovative project objectives involving the community. The following are only a few of the many strategies used:

Prevention Strategies

IMPA CT Program (Informed Merchants Preventing Alcohol-Related Crime Tendencies)

The IMPACT Program teams an ABC investigator with a local law enforcement officer to conduct visits and inspections of licensed premises. During their visits, IMPACT teams remind licensees of the responsibilities and accountability associated with the sale of alcohol. The officers also inspect licensed premises for compliance with State and

local laws. A checklist is used to note any violations observed and is given to the licensee to correct any problems. Later, officers conduct follow-up visits to see if the licensee corrected the problems. If the licensee has not, the checklist is noted and the information is given to the local ABC District Office for possible disciplinary action against the license. In addition, officers may issue a criminal citation for any criminal violations. IMPACT was created in the mid 1980's. Prior to the GAP Program, IMPACT activity was virtually non-existent. After the GAP Program began, statistics soared. For example, during fiscal year 1994/1995 only 160 outlets were visited. That number increased to 1,210 in fiscal year 1995/1996.

LEAD Program (Licensee Education on Alcohol and Drugs)

This national-award-winning program, created in 1991, is a free, voluntary prevention and education program for licensees, their employees, and applicants. Training on serving alcohol safely, responsibly, and legally and preventing illicit drug activity is presented. Grant agencies may sponsor this 3-112 hour responsible beverage service training program for licensees within their jurisdictions.

Enforcement Strategies

During the grant period, ABC's Special Operation's Unit and other ABC enforcement personnel work with grant agencies and communities to identify problem alcohol outlets. Enforcement activities include undercover investigations and task force operations at targeted problem outlets in grant cities. In comparing 1994 to 1995 statistics in the grant jurisdictions, there were 1,870 arrests for ABC violations in 1994 versus 6,307 in 1995, the first year of the GAP Program. In comparing accusations filed against licensed businesses, there were 698 in 1994 versus 1,570 in 1995.

Enforcement also includes the following programs:

Minor Decoy Program

The Minor Decoy Program was first used by the City of Glendale in the mid-1980's. The goal of the program is to reduce the number of licensees who sell

alcohol to minors. The program uses underage decoys under the supervision of a local law enforcement agency, who attempt to purchase alcoholic beverages at licensed outlets. Criminal citations are issued to violators, and accusations are filed against the licensees.

Cops In Shops()

Cops In Shops® is a program of The Century Council. It is a community-wide, cooperative effort between retailers and law enforcement to deter minors from attempting to purchase alcohol and stop adults who buy alcohol for minors. The program places the focus on the perpetrators — those who purchase alcohol illegally. Undercover police officers pose as store employees in order to stop those persons trying to buy alcohol using fraudulent false identification or no identification at all.

Decoy Shoulder Tap Program

ABC and local law enforcement use the Decoy Shoulder Tap Program to detect and deter "shoulder tap" activity (minors who solicit adults to buy alcohol for them). During the program a minor decoy, under the direct supervision of law enforcement officers, solicits adults outside ABC-licensed stores to buy them alcohol. Any person seen furnishing alcohol to the minor decoy is arrested.

Retail Operating Standards Task Force (ROSTF)

ROSTF was implemented in 1995 when new legislation required licensees to, among other things, remove litter daily, control graffiti, provide exterior illumination, and keep windows clear of excessive signage. Uniformed officers inspect licensed premises and advise the licensee or on-duty manager of Section 25612.5 of the Business and Provisions Code and request that he or she correct the identified violations. Officers then conduct a follow-up visit and cite criminally for any uncorrected violations. Accusations are then filed against the licensee.

Training of Local Law Enforcement

ABC sponsors two training seminars for grant officers each year. Bar checks, inspections, and task force operations also provide a method to train local officers in ABC matters. These grant officers, as well as ABC investigators, give training to other officers in their departments during roll call and at other times.

Records Management and Data Systems

During the grant period, grant agencies devise new and improved systems to ensure police reports are systematically sent to the ABC District Office as required by law, and track alcohol-related data and crime at licensed outlets. Many agencies have developed systems that have made it easier to gather, track, and maintain alcohol-related crime data.

Building Liaison

Prior to receiving an ABC grant, some agencies already had a close working relationship with the local ABC District Office. Others develop the relationships through the GAP Program. The liaison built between the grant agency and ABC helps grant agencies achieve their goals and objectives within their respective communities. To foster an open dialog with grantees, each grant agency was assigned to a specific ABC investigator who would provide technical assistance and training to the grant agency. ABC felt these one-on-one relationships were critical to the success of the project.

Media Involvement

Research has shown that one of the most effective uses of the media is to publicize enforcement. The majority of the grant agencies are very proactive with the media. They issue news releases, hold news conferences, and allow reporters to observe enforcement operations. The media stories are mostly positive, telling how the local law enforcement agency use grant funds to crack down on alcohol-related crime. Often, lawbreaking licensees became compliant for fear of being targeted by ABC or the local law enforcement agency.

ASSESSMENT

Progress of the GAP Program is monitored through monthly, quarterly, and annual reports submitted by the grant agencies. These reports **detail** number of arrests, enforcement operations, licensee training programs, community outreach programs (including number of individuals in attendance), and officers trained through roll call training. The reports are submitted to the Grant Coordinator, who then compiles the data. The effectiveness of the program is evaluated on a regular basis by GAP Unit personnel to ensure that agencies are meeting their goals.

Since 1995, the success of the program has spread, leading to the renewal of the program in each of the subsequent years. In 2001, the California Legislature passed a bill increasing ABC license fees beginning in 2002. The increase in fees will provide needed funding to continue the program on a permanent basis. Full support for the program has also come from the Governor's office. To date, there are over 72,000 licensed outlets, 66,000 of which are retail licensed outlets.

The GAP Program has worked well because of the partnerships that have evolved and the hard work of those individuals who have participated in this program since its inception. Many grant agencies have continued to use the ABC strategies and programs they learned during their grant cycle. The most important aspect of the program in those communities served by the grants is the visible improvement in the physical appearance of the communities. That has been an incalculable benefit. The following highlights some of the accomplishments of the GAP Program from its inception in 1995 through June 2001:

- Calls for service at ABC retail outlets have reduced in each community where a grant was awarded. As an example, the Ventura Police Department reported a nearly 20% reduction in calls for service at 26 of the worst offending ABC outlets in their city. Some bars and nightclubs showed an even greater drop in calls for service, almost 40%.

- Over 26,385 local law enforcement officers received the proper training and strategies for dealing with problem outlets.
- In grant cities, 18,944 licensees and/or their employees attended LEAD training seminars sponsored by grant agencies.

There have been 44,320 alcohol-related arrests and citations statewide through June of 2001.

Community outreach programs and meetings with the grant agencies have resulted in meetings with 118,687 citizens about alcohol-related issues in their communities.

The relationships developed through the GAP Program contributed to the successful completion of five training videos produced by ABC for local law enforcement.

These videos were endorsed and broadcasted by the California Commission of Peace Officer Standards and Training. One of the videos received two communication industry awards.

- ROSTF and IMPACT accounted for 10,249 retail outlets being visited. Prior to the inception of the GAP Program, an average of only 30 outlets statewide would be visited. Currently, over 1,000 licensed premises are visited statewide each year.
- 1,274 retail outlets participated in the Cops in Shops® and Decoy Shoulder Tap Programs.

Several new law enforcement programs have been developed or revised:

- In 1995, the Organized Crime and Vice Division of the Los Angeles Police Department (LAPD) created "Operation ABC." This grant project has been indirectly responsible for over 18,000 alcohol-related arrests and 3,200 ABC accusations by LAPD vice personnel. Since the project began DUI-related traffic collisions and arrests have continued to decline in the second largest city of the nation. Reported DUI traffic collisions declined 19 percent since 1995; DUI arrests have decreased 22 percent. Arrests have reached a ten-year low in both categories. This program received an award from the National Commission Against Drunk Driving.

- In 1995, Chico Police Department, wider its grant from ABC, developed the very successful Every 15 Minutes Program for high school juniors and seniors. What began as one program at one high school in 1995, grew in over six years to almost 2,000 high school programs conducted. About 4,975 students role-played as alcohol-related crash victims and over 80,000 students attended the program. Other states have also adopted this program.

Chico Police Department also developed a multi-agency task force that targets minors who are attempting to purchase alcohol or enter a bar or night club with false identification. The task force included local law enforcement, ABC and Department of Motor Vehicles investigators.

- In 1999, San Diego Police Department expanded Chico's false identification task force idea and named it "Operation Trapdoor." During the operation, ABC licensees contact law enforcement when they have a person with false identification at their business. With roving teams of investigators in the area, the response time is nearly immediate. When the investigators arrive, they arrest and interview the minor. They release the minor on a misdemeanor citation or, in extreme cases, take the minor into custody.
- In 1999, Fontana Police Department created the Dry2K program, a multimedia educational program for high school seniors. The CD-ROM-based program was shown to over 2,000 students in the 1999/2000 school year. *The* program combines an illustrated story with an original soundtrack, statistics on traffic fatalities, hands-on activities with Fatal Vision goggles, and crash scene photos.

The Grant Assistance Program strongly represents the Problem-Oriented Policing model of Scanning, Analysis, Response, and Assessment. The program has worked successfully for 145 local law enforcement agencies throughout California. It can be easily used anywhere in the nation. Partnerships between local law enforcement agencies, ABC, and the community have continued to grow since the inception of the

program. Moreover, ABC's mission of protecting the health, safety, welfare, and economic well being of the people of the state is being met through this innovative program.

ADDITIONAL INFORMATION

Since its inception, the GAP Program has been supported by the ABC Executive Staff and District Administration. To this day the program is strongly supported by all ABC staff. One hundred forty-five local law enforcement agencies and their respective communities have been well served because of the GAP Program.

Members of the GAP Team did not receive any training in Problem-Oriented Policing and Problem Solving before the project began or during its initial execution. However, current members of the GAP Team have received such training. Current staffing includes a Project Manager, Project Coordinator, one Supervising Investigator and six Investigators statewide. No past problem-solving examples were reviewed. However, the GAP Team examined the grant methods of the California Office of Traffic and Safety and Office of Criminal Justice Planning since ABC had not given grants in the past. No additional incentives were offered for ABC investigators participating in the program. Funding for grants and salaries comes from ABCs reserve funds, which is financed by industry license fees.

Contact Information:

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**STATE OF CALIFORNIA
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL
STATISTICS
1990 THROUGH 2001**

	<u>1990/91</u>	<u>1991/92</u>	<u>1992/93</u>	<u>1993/94</u>	<u>1994/95</u>	<u>1995/96</u>	<u>1996/97</u>	<u>1997/98</u>	<u>1998/99</u>	<u>1999/00</u>	<u>2000/01</u>
♦ Total Number of Arrests by ABC	3,421	2,284	577	1,917	2,215	3,044	3,475	2,870	3,179	2,802	2,826
♦ Total Number of Accusations	4,056	2,359	1,311	1,301	2,831	3,146	3,512	3,413	2,656	2,183	1,713
♦ Total Number of License Suspensions	*	*	216	166	336	897	1,182	1,072	824	702	518
♦ Penalties Imposed Following Hearing	340	231	142	123	147	262	387	319	537	462	280

*Statistics unavailable