

OPERATION NETFORCES

Raleigh Police Department

SUMMARY

SCANNING

In January 2002, Raleigh Police identified bars and nightclubs (clubs) as chronic locations of crime, loud noise and large crowds. Police met with a problem nightclub owner and developed a successful plan, which was later expanded citywide. In August 2002, 93 club owners were invited to meet with regulatory and law enforcement agencies; owners understood that relevant laws would be monitored and uniformly enforced. However, calls for service continued to climb. The tragic loss of lives in Chicago and Rhode Island nightclubs was a wake-up call to local and state agencies that police alone could not solve club problems.

ANALYSIS

The analysis phase was a two-month process that included assessing current agency practices, researching successful strategies and identifying data, resources, and circumstances surrounding the problem. Key issues were identified, including the lack of understanding of laws, data inaccessibility, inefficient police responses, unclear expectations of off-duty officers, and irresponsible club management practices. The team analyzed license, permit, and calls for service and noise complaint data. Establishments with 10+ calls in the preceding year were flagged. Calls rates were also calculated based on maximum occupancy.

RESPONSE

Based on the analysis phase results, the team agreed that a coordinated initiative to monitor and enforce health and safety violations would reduce police calls for service, improve patron safety and reduce noise complaints in areas where the clubs were located. This initiative is called OPERATION NETFORCES, which is a collaborative effort to improve safety through a coordinated education, prevention, intervention, and enforcement initiative with local and State agencies. NETFORCES seeks to help unsafe businesses with cooperative owners stay open while making the necessary safety enhancements and shut down unsafe businesses with uncooperative owners.

ASSESSMENT

Of those 25 locations with 10+ police calls for service in the prior year, NETFORCES interventions resulted in a 65% decrease in calls for service and 37 unlocked or unblocked exit doors. Based on occupancy rate, the average calls-for-service per 100 patrons dropped 13%. There was a 40% reduction in police calls for service (177 fewer responses) at clubs where cooperative owners took immediate action to remedy the violations. Of the 13 clubs with uncooperative owners, calls for police service slightly increased. However, seven clubs were temporarily closed because of unaddressed life safety violations. The plan is to continue to monitor police calls for service and call rates based on occupancy to identify emerging problems.

SCANNING

In January 2002, the Raleigh Police Department (RPD) began its transition from a response-driven department to a problem-oriented policing agency. The Downtown District was the city's first geographically distinct police district; five other districts were established a year later. The District Commander was tasked with reducing crime, fear and disorder in Downtown Raleigh, an area with a heavy concentration of bars and nightclubs. This was the first time police data had ever been used to identify chronic problem locations.

After reviewing calls-for-service data, Downtown District personnel identified bars and nightclubs as chronic locations of crime, loud noise and large crowds. Calls for service increased 50 percent from May to August 2002 at these locations (*Appendix A*) and one establishment accounted for a large portion of these citizen-initiated calls. Police met with the owner of this problem nightclub to discuss calls for police service, assaults and loud noise complaints, and to develop a plan. Because this approach worked to reduce problems with the first nightclub, the police department sought to expand this approach citywide and arranged for a meeting between three groups: (1) bar and nightclub owners and managers from throughout the city; (2) alcohol, codes and amplified entertainment regulatory and enforcement agencies; and (3) the Raleigh Police Department. The purpose of the meeting was to have bar owners and managers take greater responsibility for safety and security in and around their properties.

In August 2002, ninety-three owners and managers of amplified-music establishments selling alcohol attended the meeting, including many of the problem establishments. It was believed by these regulatory and law enforcement agencies that better compliance with local and state laws by bars and nightclubs would reduce crime, reduce calls for police service and noise complaints. After these establishments were put on notice that these ordinances and laws would be monitored and uniformly enforced, the police department took on an active intervention and enforcement role for all the agencies.

In February 2003, twenty-one lives were lost and 55 injured in a Chicago nightclub when 1,500 patrons (posted for 327) rushed locked and blocked exit doors to escape pepper spray fumes created by

security guards trying to break up a fight inside the bar. Three days later, fire killed 98 patrons and injured 186 in a Rhode Island nightclub. Both nightclubs had life safety and other serious building and fire code violations at the time of these tragedies. These tragedies, combined with rising calls-for-service related to bars and nightclubs, made these Raleigh agencies acutely aware of their collective role in improving safety in and around bars and nightclubs — the police alone could not reduce or solve these problems (*Appendix A*).

ANALYSIS

The analysis phase was a two-month process that consisted of many steps, including assessments of current agency practices, identification of relevant data and resources, recognition of events and conditions that preceded and accompanied the problems, and research into successful strategies. The outcome of the analysis phase was the development of a working hypothesis about the nature of the problem.

On April 3, 2003 the police department asked the regulatory and law enforcement agencies involved in the August 2002 meeting to reconvene. Agencies participating included the City of Raleigh — Police, Fire, Revenue, Inspections, and City Attorney; Wake County — Alcohol Beverage Control (ABC) Law Enforcement and Environmental Services; and State of North Carolina — ABC Commission, Alcohol Law Enforcement and NCSU Campus Police; these agencies later became known as the "NETFORCES" team. The purpose of this and subsequent meetings was to take an inventory of how problems in and around nightclubs were being addressed by each agency, and discuss the strengths and limitations of the approaches. Meetings were facilitated by RPD's Strategic Initiatives Manager, who is a trained facilitator.

During these meetings, each agency shared their roles and responsibilities related to bar and nightclub (club) safety, their abilities to take action, their departmental policies, staffing levels and limitations, and the codes, ordinances and laws that guide or bind their actions. In addition to learning about each agency, this team discussed the events and conditions that preceded and accompanied problems in and around clubs. They are:

1. *Inconsistent awareness, understanding, application, and enforcement of local and state laws related to bars and nightclubs among NETFORCES team members.*

- o No common understanding among team members of city ordinances, licensing rules, occupancy rules, building codes related to places of assembly, alcohol laws, and fire codes related to clubs. Even club owners were frustrated by inconsistent direction offered by city agencies.
- o Code violations resulted in inconsistent responses from regulatory and law enforcement agencies ranging from verbal or written warnings, citations, fines, civil penalties, and physical arrest. Responses to violations varied within agencies depending upon the staff member.
- o Police officers and other team members were unfamiliar with the appearance of and information found on required licenses and permits.
- o Fire and building inspections occurred during regular business hours, not during the evenings or weekends when establishments were open to the public. The poor timing of inspections obscured the true picture of business practices.

2. *Inconsistent availability and access to club data stored on separate mainframes and lack of communication of data between agencies to identify or monitor problem locations.*

- o Team did not know exactly how many clubs were in Raleigh.
- o No centralized database that included or could link information about clubs between different agencies.

- o Problems at clubs were handled on an individual basis by each agency and there was no communication between agencies,
- o The absence of data created difficulty in determining the relative safety and security of different clubs.

3. Inefficient police responses to recurrent problems at clubs.

- o Police interventions were not effective as officers continued to respond to an increasing number of calls for service.
- o Police were not trained in problem solving techniques.
- o Expectations of officers, such as police powers and ordinance requirements at bars, were not clear to them.

4. Confusion about responsibility for problems at clubs as a result of required security at Amplified Entertainment venues.

- o Amplified Entertainment ordinance requires an officer with sworn status at some but not all establishments with an amplified entertainment permit, depending on occupancy and the presence of a parking lot. Business owners, regulatory and enforcement agencies were unsure which businesses required an off-duty officer to be in compliance with the ordinance. For example, many of the Downtown clubs are exempt from this requirement because they do not have a private parking lot.
- o This requirement is not based on alcohol sales or tied to calls for service or other violations.
- o Because the Amplified Entertainment ordinance was not enforced, there was inconsistency in the use of off-duty officers at establishments with amplified entertainment.

5. *Confusion about responsibility for problems at clubs stemming from potential conflicts of interest between the off-duty officer's employer and the police department.*

- o There were unclear expectations of off-duty officers at clubs and often there were conflicts between the off-duty employer's expectations and police expectations. The Police Department had little control over off-duty assignments.
- o Although off-duty officers were required by ordinance to work parking lot security at clubs, it was not always clear if the on-duty or off-duty officer was responsible for handling problems at the location. For the most part, off-duty officers were not taking police actions. Many were not in uniform and therefore did not create a visible presence. Officer safety was an issue as the off-duty officers' locations were unknown to the 911/Emergency Communications Center.

6. *Inconsistent practices and data, and lack of coordinated responses by regulatory and law enforcement agencies fueled irresponsible management practices at some establishments, which appeared to make some locations "crime magnets."*

- o Clubs operated largely "under the radar screen" as essentially unregulated businesses. To avoid sanctions, some businesses would close and then immediately reopen under a new business name.
- o Landlords and/or owners were often unaware of the problems at their locations,
- o Lax or irresponsible management practices attracted some patrons who sought the least restrictive environment for their desired behaviors, which created locations that were "crime magnets."

The team identified several harms caused by the problem these six issues: law-abiding patrons were assaulted, and over-crowding and unsafe environments were common; neighbors suffered from noise problems; the regulatory and enforcement agencies lost revenue from non-renewal of licenses and permits, unsafe structures resulted from changes in ownership and unlicensed building modifications; and the public was fearful when major crimes occurred in or around clubs.

The team used several data sources to analyze the problem. City license and permits data showed that 122 establishments had a city beer and wine permit and 135 establishments had an amplified entertainment permit. The city classified these 122 establishments in the following manner: Restaurant & Bar — 39, Nightclub — 28, Bar — 25 (no membership required), Private Clubs — 23 (bar with membership requirement), and Other — 7.

Police data included calls-for-service, crime reports, crime log summaries, arrest information, and noise complaints. Through a review of calls-for-service, establishments with 10 or more citizen-initiated calls-for-service in the preceding year were flagged for further review by the police department. These data were aggregated into a monthly chart to establish a trend line for high-call locations. The average number of calls-for-service per month increased 50% between May 2002 and March 2003; October and March being peak police service months (*Appendices A & B*).

Calls-for-service rates were also calculated using maximum occupancy as a denominator. This rate calculation allowed police to determine locations with the most problems. On average, for every 100 persons in these establishments, police fielded 16 calls-for-service per year (*Appendix C*). The average occupancy posting for establishments meeting the 10 calls/year criteria was 517 persons, the median occupancy posting was 278 persons and the mode was 99 persons. Importantly, the calls-for-service analysis revealed that the August 2002 meeting with the club owners and managers had little effect on problems (*Appendix A*).

In addition to call and crime data, information was compiled on each establishment, including business name, operating address, owner contact information, occupancy posting, City licenses and permits (privilege license, beer and wine permit, amplified entertainment permit), type of establishment, type of building use, County environmental health permits, State mixed beverage licenses, and requirements for off-duty officer based on the Amplified Entertainment ordinance. Information on fire, building and zoning violations was not computerized and would require reports to be hand-pulled, therefore, information from these reports was not used during the analysis phase. However, officials from Fire, Building Inspections and Zoning were able to speak in general terms about their impression of the locations meeting the 10+ calls/year criteria.

Finally, the team researched successful strategies for reducing problems in and around bars and nightclubs. The team found the COPS Guide: Assaults in and around Bars by Michael S. Scott (updated January 2004) to be the most useful source of information for developing our response.

The analysis and research suggested that recurrent problem locations had poor management practices, management evaded compliance due to profit motivation, and had poorly maintained establishments. Analysis and research also suggested that health and safety codes could be used to change behaviors in an establishment to reduce calls for service and citizen complaints. This was consistent with Scott (2004, p. 22): "Attractive, well-maintained bars suggest to patrons that the owners care about their property and will not tolerate disorderly and violent conduct that might destroy it."

As a working hypothesis, we determined that well-maintained and well-managed clubs had the least crime, crowd and noise problems; and in contrast, the most egregious offenders had the most health and safety violations.

RESPONSE

Based on the results of the analysis phase, the team agreed that a coordinated initiative to monitor and enforce health and safety violations would likely reduce police calls for service, improve patron safety and reduce noise complaints in areas where the clubs were located. This initiative is called "OPERATION NETFORCES:" Nightclub Education & Enforcement Task Force on Ordinances, Regulations, Codes, Environmental, and Safety. OPERATION NETFORCES is a collaborative effort to improve safety through a coordinated education, prevention, intervention, and enforcement initiative with local and State agencies. The goal is to reduce calls for service and noise complaints and increase patron safety at bars and nightclubs. NETFORCES seeks to help unsafe businesses with cooperative owners stay open while making the necessary safety enhancements and shut down unsafe businesses with uncooperative owners.

OPERATION NETFORCES is a "place-oriented" strategy with an emphasis on high-risk places at high-risk times. To help narrow the focus to these problem locations, the team developed focused criteria used to trigger team inspections (*Exhibit #1*).

EXHIBIT #1:
CRITERIA FOR SELECTING BUSINESSES FOR TASKFORCE INSPECTION

- Qualifies as a "Place of Assembly" –AND–
- Has an alcohol permit –AND–
- Qualifies for an amplified entertainment permit –OR–
- Identified as a chronic violator by Wake County ABC Enforcement or NC ALE –OR–
- Numerous complaints have been registered against the establishment –OR–
- Numerous police calls-for-service have been generated to the establishment's address –OR–
- Establishments that have been previously found to have violations.

Priority will be given to establishments with the highest occupancy or situations that may generate large crowds.

OPERATION NETFORCES employs several methods to monitor and enforce health and safety violations. Unannounced team inspections of high-risk clubs occur each month during peak calls-for-service times and days, typically 10 PM — 2 AM, Fridays and Saturdays. The team inspections are led by a Police supervisor. Inspection team members include a Fire Marshal, alcohol law enforcement agent, health inspector, and a building inspector. The first team inspection occurred on May 5, 2004.

Another method is the use of repeat follow-up inspections on clubs with outstanding violations by respective agencies until the violations are corrected. Team members also conduct one-on-one meetings with club owners and managers to discuss specific problems and to develop a plan to resolve the issues. Meetings with groups of club owners and managers are also conducted to discuss general issues with clubs and to hear the owners' or managers' concerns, including their feedback on NETFORCES team inspections. Finally, letters are mailed to owners to address specific issues, such as lack of compliance with the City's Amplified Entertainment ordinance.

In order to have a coordinated monitoring and enforcement initiative at bars and nightclubs, the team systematically addressed the six key issues previously identified in the analysis phase. The first issue addressed by the team was our own inconsistent awareness, understanding, application, and enforcement of local and state laws related to bars and nightclubs. The following actions were taken:

- o All relevant rules, requirements, codes, ordinances, and laws were collected into a NETFORCES reference manual for each agency. Training was given to team members on information in the manual.
- o Team members received cross-training on what each agency looks for during a club inspection.
- o The team agreed upon standard team inspection protocols and action steps, such as when to warn, cite, fine or arrest (*Appendix D*).
- o New team members shadowed their agency counterpart to learn how to conduct a NETFORCES inspection.

- o The Fire Marshal, Health Inspector and Building Inspector changed their hours to participate in team inspections (typically 10 PM — 2 AM, Fridays and Saturdays) to gain a truer picture of the business practices.
- o The team met on a monthly basis to share and discuss club information in detail. In between monthly meetings, members received detailed monthly meeting agendas and notes copies of inspection reports, updated license and permits, notice of business ownership closures or changes, updates on problem locations, weekly club concert schedules, calls-for-service data, criminal and civil violations, and feedback from club owners, managers and community members.
- o Police officers received a training bulletin with images of each permit and license required to be posted in establishments selling alcohol or providing amplified entertainment. The bulletin included permit requirements and actions to take if the business was not in compliance (*Appendix E*). Training was provided at each roll-call.
- o To further assist officers and to ensure consistency, a "frequently used quality-of-life charges for clubs" was developed.

The second issue identified by the team was the inaccessibility or unavailability of data. To remedy this, data and information on each establishment were combined into a master database by the Police Department and regularly updated; the NETFORCES database and inspection reports were made available on the City's intranet to team members (*Appendix F*). In addition, District Crime Analysts pulled calls-for-service and crime data every 28 days and alerted the team of changes and new hot spots.

The third issue related to the police department's inefficient responses to recurring problems at bars and nightclubs. The intervention to remedy this included the department's realization that this was not just a police problem. By working together, NETFORCES partners were able to more efficiently and effectively solve many of the recurring problems. For example, the Fire Marshal used their authority to enforce occupancy limits so overcrowding would not occur, which according to Scott (2004, p. 23), can lead to

fights and other aggressive behaviors. NETFORCES contact information was also provided to ensure a direct line of communication among team members to enable swift resolution of problems.

To bolster the police department's problem-solving abilities, officers received training on problem solving techniques specifically related to clubs. In addition, a supervisor in each district was assigned to oversee problem-solving efforts at clubs. District Command staff also met one-on-one with club owners, managers and landlords to discuss safety issues and to devise a plan.

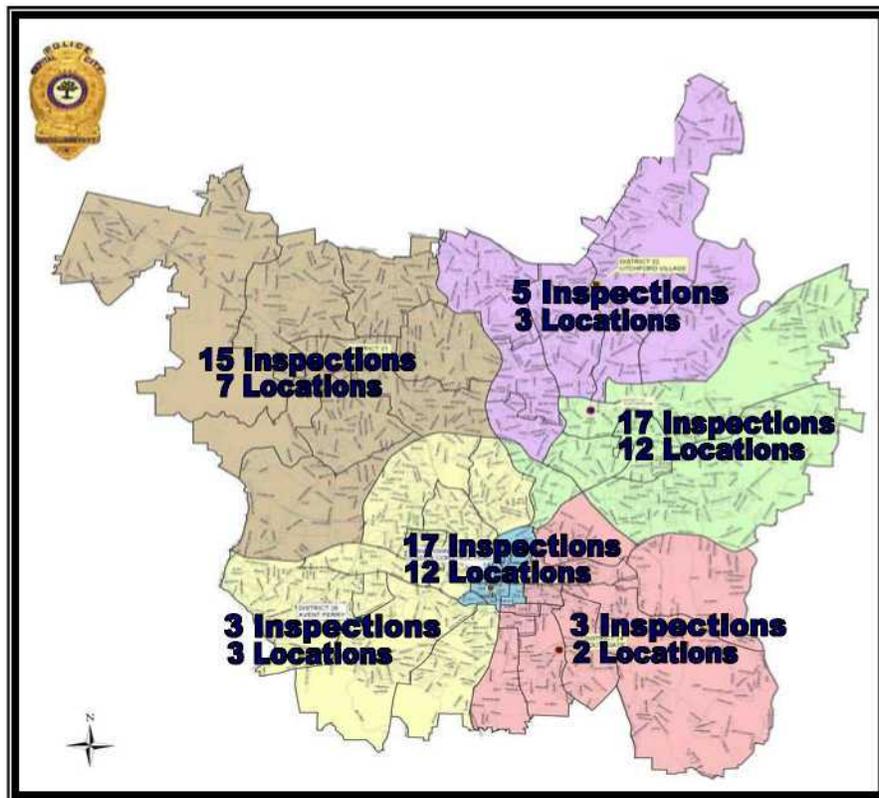
The fourth issue stemmed from the confusing ordinance requiring security at amplified entertainment venues. To end this confusion, the City Attorney's Office determined whether a location was held to or exempt from the ordinance requiring employing one sworn officer during business hours between 8 PM to one hour after closing time (regardless of the use of amplified entertainment). This information was added to the NETFORCES database. Owners were sent letters or were visited by officers to educate owners and managers who were not in compliance with the ordinance. Businesses were given a grace period before enforcement was taken.

The fifth issue related to confusion over the role and responsibilities of off-duty officers at places with amplified entertainment, specifically clubs. The police department does not have authority over off-duty employment; off-duty assignments are a contractual agreement between the officer and contractor. Therefore, just as some businesses were lax in complying with the security requirement, many off-duty officers were lax about their role and responsibility in resolving problems at these locations. Therefore, a policy memo was sent to all officers clarifying the department's expectations of off-duty officers at clubs. For example, off-duty officers are now required to be in uniform, check in with the 911/Emergency Communications Center for a call number, and take police action, including writing reports, if they work at a club. It was also strongly suggested that officers find replacements when they cannot work their scheduled off-duty job, as this situation creates an ordinance violation and could result in a hefty fine for the business. In addition, the Field Operations Commander restricted off-duty employment at locations deemed unsafe by NETFORCES.

Businesses were quick to point out to the Mayor and City Council that this ordinance was overly burdensome, not related to existing problems at the location and created the appearance of a "police shakedown." As a result, the ordinance is under revision with plans for a public hearing.

The final issue involved irresponsible management practices at some establishments that appeared to make some locations "crime magnets." This problem was perpetuated by a lack of coordinated responses, data and inconsistent practices by regulatory and enforcement agencies. To counter this, NETFORCES team inspections and other above-mentioned methods were implemented to monitor and enforce health and safety violations. During the first year of OPERATION NETFORCES, 60 team inspections were conducted at 39 locations meeting the criteria outlined in Exhibit #2 (*Appendices G & H*). The team averaged 3.75 inspections per evening.

EXHIBIT #2: NETFORCES INSPECTIONS BY POLICE DISTRICT



ASSESSMENT

OPERATION NETFORCES is a comprehensive initiative that has resulted in a reduction of police calls for service and improved patron safety in the areas where clubs are located. NETFORCES focused team inspection efforts on establishments meeting criteria outlined in Exhibit #1. Of those 25 locations with 10 or more citizen-initiated police calls for service in the year prior to the launch of the initiative, NETFORCES interventions resulted in a steep decline in calls for service (*Appendix A*). Collectively, monthly police calls for service ranged from 56 to 95 prior to NETFORCES in these 25 locations. After NETFORCES interventions, the low end of the range dropped to 33 police calls for service per month from a high of 94; this is a 65% decrease. The most dramatic drop occurred in October 2003, when calls dropped 36% (from 94 per month to 60).

The change in calls-for-service rates was also calculated for these 25 establishments using maximum occupancy as a denominator. On average, for every 100 persons in these establishments, police fielded 16 calls-for-service per year. Post-NETFORCES, the average dropped to 14 calls-for-service per 100 patrons (*Appendix B*).

NETFORCES helps unsafe businesses with cooperative owners stay open while making the necessary safety enhancements and shut down unsafe businesses with uncooperative owners. NETFORCES saw a reduction in police calls for service and an increase in patron safety at locations where cooperative owners and managers took immediate action to remedy health and safety violations. In fact, calls for service dropped over 40% (from 415 to 238 calls) in these 12 locations when comparing one year of data pre- and post-NETFORCES. As a result, there were 177 fewer police responses to these 12 locations post-NETFORCES (*Appendix B*). Overall, these locations also had fewer life safety violations than the 13 team inspected bars with uncooperative owners.

Of the 13 bars and nightclubs uncooperative owners, calls for police service slightly increased from 524 to 569 post-NETFORCES (*Appendix B*). Seven of these clubs were temporarily shut down because of a significant number of unaddressed life safety violations. In another situation with an uncooperative owner,

the police department met with the landlord, who later chose not to renew the club's lease and will not allow another business with a liquor license to rent his property.

The safety of patrons also immediately improved as a result of NETFORCES. Most importantly, thirty-seven exit doors were unlocked or unblocked and five unsafe food service operations were halted during the inspections; these life safety violations could have resulted in devastating consequences for patrons. Exhibit #3 shows the results of the team inspections:

EXHIBIT #3: NETFORCES TEAM INSPECTION RESULTS (5/03 – 5/04)		
<u>Total Team Inspection Violations (165+)</u> Fire: 116+ (55 life safety) Inspections: 31 (21 life safety) City Licensing/Permit: 9 Alcohol: 26 Environmental Health: 17+ (5 life safety) <u>Inspections Violation</u> No occupancy permit: 10* Occupancy not posted: 4 Occupancy violation: 11* Other inspection violations: 6 * denotes life safety violation	<u>Fire Violations</u> Locked exit: 9* Fire exit: 20* Blocked exit: 8* No panic hardware: 9* No exit lights: 7* Other life safety: 2* Other fire: 61+ <u>City licensing</u> Private license violation: 0 Amplified entertainment violation: 4 Other outdated permits: 1 Other license violation: 4	<u>Alcohol violations</u> ABC violation: 6 City beer/wine permit violation: 8 Other alcohol violation: 12 Drug violation: 0 <u>Environmental Health violations</u> Food permit violation: 2* Unauthorized use of glassware: 3* Sanitation grade card violation: 0 Other environmental services: 12+

These results indicate that the six issues identified in the analysis phase have been successfully addressed. For example, the team's streamlined communication process, cross-training and clear inspection protocols enabled dangerous clubs to be closed within 24 hours of detecting the serious violations. Off-duty officers took an active role in resolving problems at bars and nightclubs, including arresting dangerous fugitives that the off-duty officers recognized from police alerts. The use of data allowed for early detection of problem locations. Finally, feedback from club owners and manager has resulted in mutually beneficial changes to the team inspection process. The plan is to continue to monitor police calls for service and call rates based on occupancy to identify emerging problems.

APPENDIX D: UPDATED INSPECTION PROTOCOL FOR KEY VIOLATIONS

VIOLATION	ACTION TO BE TAKEN
No/Expired Amplified Entertainment Permit	<p>If they have amplified entertainment without a permit, it is recommended that RPD cite business; officers should notify Audrey Mise, Revenue, when this occurs. <i>(Modified Captain Lane 11/25/03)</i></p> <p>RPD to send a memo to Larry Strickland, Inspections, when they warn or cite an establishment for having amplified entertainment without a valid permit. <i>(Added 7/8/03 by N. Daniels)</i></p>
No Off-Duty officer at establishment with Amplified Entertainment Permit (AEP) between 8 PM and 1 hour after closing	<p>Before taking enforcement action, officers should verify with Larry Strickland that the establishment has an AE permit and is required to have an officer and has not received a waiver.</p> <p>Per Dawn Bryant, officers are to warn, cite or arrest the permit holder or the on-site manager for not having an off-duty officer.</p> <ol style="list-style-type: none"> 1. <u>First violation</u>: Officers should document violation for not having an off-duty officer, as required for their Amplified Entertainment permit, and send information to Larry Strickland, Inspections. Larry Strickland will then issue a civil penalty. 2. <u>Subsequent violations</u>: If business continues to be out of compliance, then officers may issue a criminal citation to either the permit holder or the on-site manager if a location with an AE permit who is supposed to have an officer does not have one. A memorandum should be sent by the officer to Larry Strickland for issuance of a civil penalty. 3. Officers may arrest the permit holder or on-site manager for repeated non-compliance. <p>REMINDER: If the business is required to have an officer on site then the officer is required to be there when the business is open, from 8:00 p.m. to one hour after closing, whether or not the business is actually providing amplified entertainment. We do not have the authority to make exceptions to the ordinance. If the businesses find the city ordinance objectionable then they will have to bring the issue before the City Council. <i>(Procedure revised by Dawn Bryant on 10/7/03)</i></p>
No/Expired Occupancy Permit	<ol style="list-style-type: none"> 1. 1st time – issue WRITTEN warning with referral form for violation (provide to Jim Lane, Building Inspections). After 1 warning, cite business. 2. Also, assume maximum occupancy is <u>99</u> and act accordingly to reduce occupancy to <u>99</u> or close establishment. <i>(Corrected 6/3 by J. Lane from 49)</i> 3. Fire Marshal can issue verbal warning and use report to notify Inspections Department. <i>(Added 6/3 by T. Crabtree)</i>
No Occupancy Permit Posted	1 st time – issue WRITTEN warning with referral form for violation (<u>provide to Jim Lane, Building Inspections</u>). After 1 warning, cite business.
Any life/safety violation	Cite business. Forward copy of citation to Fire and Inspections.
Expired alcohol permits	Cite business. Forward copy of citation to Wake ABC Law Enforcement.
ABC license holder with no City privilege &/or beer/wine permits	Cite business and notify Audrey Mise, Revenue. <i>(Added 10/1 by Kristen Rosselli)</i>
Other violations	Exercise discretion. In the least, issue a written warning.