



Office of the City Manager

INFORMATION CALENDAR

January 28, 2014

To: Honorable Mayor and Members of the City Council

From:  Christine Daniel, City Manager

Submitted by: Jim Hynes, Assistant to the City Manager

Subject: Second Response Ordinance Enforcement; Data and Legal Analysis

CURRENT SITUATION AND ITS EFFECTS

At its November 12, 2013 meeting, the City Council requested certain information regarding enforcement of Berkeley Municipal Code Chapter 13.48, the Second Response Ordinance. The Council requested data regarding the number of notices issued under the ordinance, the current process for enforcement, clarification of the appeal process and the City Attorney's opinion regarding the legality of the ordinance. This report responds to all of these requests.

Constitutionality and Due Process

Chapter 13.48 prohibits imposing a monetary penalty for a *first* unruly gathering. The ordinance requires the City to first provide a written warning, which must be posted at the site where the unruly gathering occurred.¹ This is referred to as an "Exhibit A". (See Attachments 1 and 2 showing the front back and of the Exhibit A form). The property owner receives a letter describing the incident and the consequences if a second unruly event occurs (See Attachment 3). Only if the City is required to intervene in a *second* unruly gathering within 120 days of the posting of the notice, may penalties be assessed. At the time that the Exhibit A is posted, police officers review both sides of the form with the residents of the subject property and ensure that the residents understand that BMC Chapter 13.48 provides that specified persons are jointly and severally liable for civil penalties of \$750 for a second response, \$1,500 for the third response, and \$2,500 for each subsequent response within the 120 day warning period.

If another unruly event that meets the criteria under BMC 13.48 occurs in the 120 day warning period, the property owner is sent via registered mail an Exhibit B Letter (See Attachment 4) and an administrative citation. In addition, the property is posted with another Exhibit A and the 120 day warning period begins anew. Issuance of an Exhibit B provides notice to the property owner that a subsequent unruly event did in fact occur

¹ Notice must also be provided to the property owner.

within the 120 day warning period and that a penalty \$750, \$1,500 or \$2,500 is being imposed depending on whether this is the second, third or fourth response.

Penalties are assessed pursuant to the procedure set forth for administrative citations in BMC Chapter 1.28 (Administrative Citations), which permits appeals to a City Hearing Officer and then to Superior Court. Since the basis for any penalty assessed under Chapter 13.48 is that there have been at least two unruly gatherings, a person upon whom a penalty is assessed may argue on appeal that two unruly gatherings did not occur, either because the first gathering was not “unruly” as defined, or because the second was not. Thus, before any penalty may be assessed under Chapter 13.48, an aggrieved person may appeal on the grounds that the first gathering, which triggered the posting of the notice, was not unruly under Chapter 13.48. Accordingly, the idea that the warning required by Chapter 13.48 may not be appealed is incorrect.

As far as staff can discern, the purported harm to owners and/or residents of properties that have been posted under Chapter 13.48 is to their reputation – as one speaker said at the Council meeting, the posted notice is like a “scarlet letter”. However, “injury to... reputation alone will not support a federal due process claim.... A similar result follows under the California Constitution.” (*Burt v. County of Orange* (2004) 120 Cal.App.4th 273, 283-284, citing *Paul v. Davis* (1976) 424 U.S. 693, 711-712; other citations omitted. *Accord Ryan v. California Interscholastic Federation-San Diego Section* (2002) 94 Cal.App.4th 1048, 1071.)

Chapter 13.48 is fully consistent with the requirements of due process. Chapter 13.48 defines “unruly gatherings”, declares them to be public nuisances, and authorizes the City to intervene to abate or quell them. Chapter 1.28 provides for appeals to the City Hearing Officer and then to Superior Court.

Citations issued in 2013

From January, 2013 to December, 2013, there were approximately 93 Exhibit A’s posted citywide. (See Attachment 5 for a list of block addresses and Attachment 6 showing a map of where violations occurred). Of these, approximately 11 resulted in the issuance of an Exhibit B Letter and administrative citation. There were no appeal requests.

Warning and Citation Procedures

In an effort to provide Council with additional information about the procedures associated with BMC 13.48, staff has described both the warning and citation process below.

Warnings

Berkeley Police Department (BPD) officers and University of California Police Department (UCPD) officers become aware of events that may qualify for enforcement

under the second response ordinance in several ways, including complaints from neighbors, referrals through the Berkeley Fire Department (BFD) and while on routine patrol.

Once the event comes to the officer's attention and the officer determines that the event meets the enforcement criteria defined under the ordinance, a gathering of 10 or more people that causes a disturbance of the quiet enjoyment of a significant segment of a neighborhood, the officer will initiate contact with the event organizers, inform them that the event is creating a significant disturbance to the neighborhood and that the event meets the criteria for enforcement under the ordinance. The officer then has the discretion to decide to issue a formal written warning, referred to as Exhibit A (BMC Section 13.48.030.A.).

If the officer decides to issue a formal written warning, this warning notice is posted in a conspicuous location on the property and remains in effect for 120 days. Removal of the posting is subject to a \$100 fine. The owner of record is notified of the Exhibit A posting via registered mail. The Exhibit A posted warning expires on the 121st day.

Citations

A second response to the same property within the 120 day warning period may result in the issuance of an Exhibit B Letter and a citation (BMC Section 13.48.050.B.). If the officer determines that the event is again in violation, he or she will initiate contact with the event organizers, inform them that they are in violation within the 120 day warning period, the property owner is subject to an Exhibit B Letter and administrative citation, and that the property will be re-posted with a new Exhibit A starting over the 120 day warning period. The officer forwards the case to the BPD Area Coordinator who reviews the incident to ensure it meets all the criteria for enforcement. If it does meet the criteria for enforcement, the BPD Area Coordinator forwards the case to the BPD Area Commander Lieutenant who then completes an Exhibit B Letter, writes an administrative citation for \$750 and mails them to both the event organizer and the owner of record via registered mail.

A third response to the same property within the revised 120 day warning period may result in a second fine of \$1500, subject to the same discretionary factors used in issuing the previous Exhibit B Letter. All subsequent violations within each 120 day warning period may result in additional Exhibit Bs and citations of \$2500 for each violation. BPD notifies the property owner of record via registered mail for all subsequent Exhibit B Letters that are issued.

In enforcement situations in which UC Berkeley students are involved, UC's Office of Student Conduct is informed of the enforcement actions and students are subjected to disciplinary action under the Code of Student Conduct. In addition, in the event that enforcement occurs at fraternity or sorority houses, the Greek Advisor in the Office of Student Life is notified and the national organization is then notified. This may result in

revocation of chapter recognition by the national organization and loss of UC recognition.

BACKGROUND

BMC Chapter 13.48 was enacted in 1993 and allows police to issue citations for noise disturbances associated with unruly parties, gatherings and similar events with ten or more people on any private property that disrupts a significant segment of a neighborhood. Police officers exercise discretion when determining if the event causes a significant disruption to a neighborhood.

The 1993 ordinance imposed a \$500 fine for the second response and \$1000 for the third response and \$1500 for any subsequent response within the posting period of 60 days. The ordinance was amended in 2008 to increase the posting period to 120 days and increase the fines, respectively, to \$750, \$1500 and \$2500 for second, third and all subsequent violations. At that time, Council had considered a 180 day warning period, but decided on a 120 day period instead with the provision that a 180 day period could be considered in the future.

RATIONALE FOR RECOMMENDATION

The current Chapter 13.48 is fully consistent with the requirements of due process.

ALTERNATIVE ACTIONS CONSIDERED

None.

CONTACT PERSON

Jim Hynes, Assistant to the City Manager, 510-981-2493

ATTACHMENTS

1. Exhibit A- front side
2. Exhibit A- back side
3. Exhibit A- Letter to property owner
4. Exhibit B- Letter to property owner
5. List of addresses where violations occurred- 2013
6. Citywide map of where violations occurred- 2013



Police Department

EXHIBIT A

(BMC §13.48.030)

IMPORTANT NOTICE REGARDING PUBLIC NUISANCE

NOTICE IS HEREBY GIVEN THAT, pursuant to Berkeley Municipal Code Chapter (BMC) 13.48, on:

Date: _____, 20____, at _____ a.m./p.m.,

The Berkeley Police Department found that a gathering at the below-listed premises caused a public nuisance as defined by BMC Chapter 13.48 (e.g., disturbance of the peace, threat to public safety, etc.):

Address: _____

WARNING

IF THE POLICE RESPOND TO ANOTHER DISTURBANCE CONSTITUTING A NUISANCE (AS DEFINED BY BMC CHAPTER 13.48) AT THE ABOVE PREMISES WITHIN 120 DAYS OF THIS NOTICE, INCLUDING, BUT NOT LIMITED TO, A DISTURBANCE LATER TODAY OR TONIGHT, CIVIL PENALTIES WILL BE IMPOSED UPON:

1. ALL GUESTS CAUSING THE NUISANCE
2. ALL SPONSORS OF THE GATHERING
3. ALL RESIDENTS OF THE PREMISES
4. ALL PERSONS IN CONTROL OF THE PREMISES
5. ALL OWNERS OF THE PREMISES THAT RESIDE ON OR ADJACENT TO THE PREMISES, OR ARE PRESENT AT THE PREMISES WHEN THIS NOTICE IS FIRST POSTED

Property owners who do not reside on or adjacent to the above premises, and who are not present when this Notice is first posted, are also jointly and severally liable for said civil penalty, if the next disturbance occurs after two weeks after this Notice is mailed to said owner.

THIS NOTICE MUST REMAIN POSTED ON THE PREMISES FOR 120 DAYS
\$100 FINE FOR UNAUTHORIZED REMOVAL OR DEFACTION OF THIS NOTICE

(Name and Signature of the Officer Issuing This Notice)

(Officer's Phone Number)

Date: _____

Case Number: _____

cc: Area Coordinator, Community Services Bureau

**BERKELEY MUNICIPAL CODE §13.48,
CIVIL PENALTIES FOR MULTIPLE RESPONSES TO LOUD/UNRULY GATHERINGS**

PERSONS LIABLE FOR SUBSEQUENT RESPONSE UNDER THE ORDINANCE (BMC §13.48.040)

If the City is required to intervene as to a gathering constituting a public nuisance on the same premises more than once in any 120-day period, including a second intervention during the same day or night as the first intervention, the following persons shall be jointly and severally liable for civil penalties as set forth in Sections 13.48.050 below, in addition to liability for any injuries to City personnel or damage to City property.

- A. The person or persons who own the premises where the gathering constituting a public nuisance took place if any of the following are the case: (1) said owner resides on or adjacent to the premises, (2) said owner was present when the Notice described in Exhibit A was first posted, or (3) the Notice described in Exhibit A was mailed to said owner and 14 days have elapsed since the date of said mailing. For purposes of this subsection, where a gathering takes place within the confines of a single unit in a building owned by a housing cooperative, the owner of the property shall be deemed to be the owner of the single unit and not the members of the housing cooperative in general. Where the gathering took place in the common area of a building owned by a housing cooperative, only the members of the cooperative owning units in the building where the gathering took place shall be deemed the owners of the property for purposes of this subsection. Other members of the housing cooperative may still be liable if they fall within the categories of person made liable by Section 13.48.040, subsections B., C., or D., below.
- B. The person or persons residing on or otherwise in control of the property where such gathering took place.
- C. The person or persons who organized or sponsored such gathering.
- D. All persons attending such gathering who engaged in any activity resulting in the public nuisance.
- E. Nothing in this section shall be construed to impose liability on the resident or owners of the premises or sponsor of the gathering, for the conduct of persons who are present without the express or implied consent of the resident or sponsor, as long as the resident and sponsor have taken all steps reasonably necessary to exclude such uninvited participants from the premises. Where an invited guest engages in conduct which the sponsor or resident could not reasonably foresee and the conduct is an isolated instance of a guest at the event violating the law which the sponsor is unable to reasonably control without the intervention of the police, the unlawful conduct of the individual guest shall not be attributable to the sponsor, owner, or resident for the purposes of determining whether the event constitutes a public nuisance under this section.
- F. There shall be no liability for civil penalties under this chapter for a subsequent intervention during the same day or night as the prior intervention, unless a reasonable time has been provided to abate the public nuisance, taking into account the size of the gathering, the time of day, and other relevant factors.
- G. There shall be no liability for civil penalties under this chapter for a second response during the same day or night as the first response when a person who would otherwise be liable under subdivision (A) seeks assistance from the Police Department to abate a public nuisance under this Chapter, and the person cooperates fully with the police while taking reasonable action to abate the public nuisance.
- H. If the City is required to intervene at a gathering constituting a public nuisance on the same premises more than once in any 120-day period, excluding a second intervention during the same day or night as the first intervention, the 120-day period shall be extended by another 120 days from the date of the second intervention.

SCHEDULE OF CIVIL PENALTIES (BMC §13.48.050)

- A. Civil penalties shall be assessed against all persons liable for the City's intervention to abate a gathering constituting a public nuisance as follows:
 1. For the second response in any 120-day period the penalty shall be the total sum of \$750.
 2. For the third response in any 120-day period the penalty shall be the total sum of \$1,500.
 3. For any further responses in any 120-day period the penalty shall be the total sum of \$2,500 for each such further response.
 4. The penalties that are provided herein shall be in addition to any other penalties imposed by law for particular violations of law committed during the course of an event which is a public nuisance under this ordinance, provided however, that if the only violation of law which constituted the public nuisance under this chapter is excessive noise, the remedies provided under this chapter shall be exclusive of any other remedies provided by law to the City for such excessive noise.
- B. The City shall bill all persons liable for the penalties by mail by sending a letter in substantially the form attached hereto as Exhibit "B". Payment of the penalties shall be due within thirty days of the date the bill is deposited in the mail. If full payment is not received within the required time for payment, the bill will be delinquent, and all persons liable for the penalties shall be charged interest at the maximum legal rate from the date the payment period expires and a further civil penalty in the amount of \$100.

'EXHIBIT A' NOTICE FORM, LIABILITY FOR REMOVAL OR DEFACEMENT (BMC §13.48.030(A))

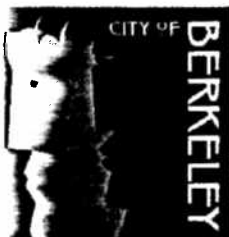
The residents and persons in control of such property, and the sponsors of the event, shall be responsible for ensuring that such Notice is not removed or defaced and shall be liable for a civil penalty of \$100 in addition to any other penalties which may be due under this chapter, if such Notice is removed or defaced, provided, however, that the residents of the premises or sponsor of the event, if present, shall be consulted as to the location in which such Notice is posted in order to achieve both the security of the Notice and its prominent display. The Notice shall remain posted for the entire 120-day period.

COLLECTION OF DELINQUENT COSTS (BMC §13.48.060)

- A. The penalties assessed as a result of a subsequent City response to a loud or unruly gathering shall constitute a debt of all persons liable for the penalties in favor of the City and may be collected in any manner authorized by law and are recoverable in a civil action filed by the City in a court of competent jurisdiction. The remedies provided by this chapter are in addition to all other civil and criminal remedies available to the City with respect to the unlawful conduct constituting the public nuisance which gave rise to the need for the City response under this chapter.
- B. The City of Berkeley may also collect the fees assessed against the owner of the property as provided in Ordinance No. 8158-N.S., The Recovery of Costs for Abatement of Nuisances Ordinance (BMC Chapter 1.25).

NONDISCRIMINATION AGAINST STUDENTS (BMC §13.48.070)

This chapter shall not be enforced in a manner which targets property housing students. Nothing in this section shall preclude the City from setting priorities in the use of its resources by enforcing this chapter against the events that are the most disruptive or against properties at which disruptive events are held most often or on the basis of other similar legitimate factors.



Police Department

(Date)

(Property Owner's address)

RE: NOISE COMPLAINT NOTICE

Dear Sir or Madam:

The University and City of Berkeley Police Departments responded to a noise complaint at the following address, where our records indicate that you are the current owner of the property.

First response: **Address:**
 Date:
 Time:
 Case #:

(Explanation of violation)

Pursuant to Berkeley Municipal code Chapter 13.48 *et seq*, the "Second Response Ordinance" was initiated and a written warning (Exhibit A) was posted on the premises. The residents of such property shall be responsible for ensuring that such notice is not removed or defaced and shall be liable for a civil penalty of \$100 in addition to any other penalties, which may be due under this section if such notice is removed or defaced. This letter serves as notification of the posting as required by Berkeley Municipal code 13.48.030(B).

Any subsequent event within 120 days on the same premises necessitating City intervention shall result in liability for all penalties associated with such intervention. Every participant in and sponsor of such event, as well as the owner of the premises, shall be jointly liable for the civil penalties connected with this response as set forth in Chapter 13.48 of the Berkeley Municipal Code.

The penalties for responses are as follows:

Within a 120-Day Period

First Response (noted above)	No Penalty
Second Response:	\$750
Third Response:	\$1500
All Responses After the Third:	\$2500

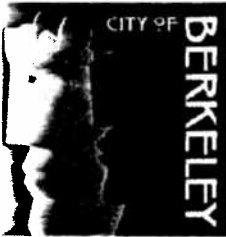
Additionally, any subsequent responses within the 120-day period shall result in the 120-day period being extended another 120 days from the date of that response.

We are respectfully requesting your immediate attention and cooperation in mitigating what may become a nuisance, thereby affecting the quality of life for neighbors and the adjacent community. We trust that you will contact the manager of the property, the resident, and any additional personnel to formulate the necessary communication to bring this problem to a swift resolution.

If you have any questions, please contact Officer Jessyca Nabozny #118 in the Community Services Bureau at 510-981-5778.

Sincerely,

Erik Upson
Operations Division Captain



Police Department

(DATE)

EXHIBIT B (Section 13.48.050)

To: ADDRESS OF PROPERTY OWNER

Dear (PROPERTY OWNER) ,

The City of Berkeley was required to abate the public nuisance caused by a gathering of 50 or more persons at [REDACTED] on [REDACTED], at [REDACTED], and documented under BPD Case # [REDACTED]. Documented under this case is the fact that the Berkeley Police Department responded to a loud party at this location, which could be heard from approximately 100 feet away from the building. Loud, amplified music and shouting could be heard from outside the building, there were broken beer bottles both inside and outside, and officers located multiple red plastic cups, beer bottles and cans. This nuisance substantially disrupted the quiet enjoyment of property in a significant segment of the adjacent neighborhood. This is the second such public nuisance at this property within 120 days, and thus, a penalty of \$750 is imposed upon you. The first violation occurred one day prior on [REDACTED]: [REDACTED] [REDACTED]. The person responsible for the event stated that he forgot it was the beginning of rush week for the fraternity system and therefore he allowed the second party to happen.

If you fail to remit this fine to the City of Berkeley by [REDACTED] you will be liable for an additional \$100 penalty, plus interest. The payment should be remitted to the address listed below.

City of Berkeley, Attn: Finance Dept. and Response, 2180 Milvia St., Berkeley, CA 94704

Your liability is based on the fact that you were:

- ☐ An owner of the property to whom was sent prior notice of a public nuisance at the property within the previous 120 days; and/or
- ☐ An owner of the property who resided on or adjacent to the property when the public nuisance took place; and/or
- ☐ An owner of the property who was present when a Notice of a public nuisance was first posted at the property; and/or
- ☐ A person who resided on or was otherwise in control of the property when the public nuisance took place; and/or
- ☐ A person who organized or sponsored the event that created the public nuisance at such property; and/or

[] A person who attended the event constituting the public nuisance at such property and engaged in the conduct which resulted in the public nuisance.

If you believe that you are not liable you may contest the issuance of the administrative citation by requesting a hearing pursuant to BMC Section 1.28.060.

Sincerely yours,

Acting Lt. J. Louis
Operations Division
Berkeley Police Department
2100 Martin Luther King Jr. Way
Berkeley, CA 94707
jlouis@ci.berkeley.ca.us

2013 Second Response Data

Attachment 5 p. 1

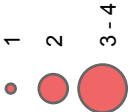
Exhibit	Address	Date
A	2500 blk Regent St	1/26/2013
A	2400 blk Prospect St	1/26/2013
A	2700 blk Channing Way	1/27/2013
A	2500 blk Ellsworth St	1/30/2013
A	1600 blk 7th St	2/3/2013
A	2800 blk Derby St	2/9/2013
A	2500 blk Telegraph Ave	2/10/2013
A	2400 blk Piedmont Ave	2/16/2013
A	2300 blk Piedmont Ave	2/17/2013
A	2300 blk Piedmont Ave	2/21/2013
A	2400 blk Grant St	2/22/2013
A	2300 blk Prospect St	2/23/2013
A	2600 blk Durant Ave	3/3/2013
A	800 blk Channing Way	3/8/2013
A	2300 blk Piedmont Ave	3/16/2013
A	2700 blk Bancroft Way	3/17/2013
A	2600 blk Regent St	3/22/2013
A	2300 blk Benvenue Ave	4/6/2013
A	2100 blk Dwight Way	4/4/2013
A	2700 blk Bancroft Way	4/7/2013
A	2400 blk Piedmont Ave	4/14/2013
A	10 blk Panoramic Way	4/13/2013
A	2300 blk Warring St	4/21/2013
A	2400 blk Blake St	4/20/2013
A	2400 blk Carleton St	4/19/2013
A	2700 blk Durant Ave	5/3/2013
A	2600 blk Hillegass Ave	5/3/2013
A	2900 blk Channing Way	5/26/2013
A	1600 blk 7th St	6/14/2013
B	1600 blk 7th St	6/17/2013
A	2300 blk Parker St	6/23/2013
B	2700 blk Bancroft Way	6/29/2013
A	2400 blk Prospect St	6/30/2013
A	2400 blk Parker St	7/3/2013
A	2700 blk Channing Way	7/13/2013
B	2300 blk Parker St	7/21/2013
A	2700 blk Channing Way	8/25/2013
A	2300 blk Piedmont Ave	8/27/2013
A	2600 blk Warring St	8/31/2013
A	2600 blk Etna St	9/1/2013
A	2400 blk Ellsworth St	9/1/2013
A	1300 blk 9th St	9/1/2013
A	2500 blk Hillegass Ave	9/1/2013
A	2300 blk Prospect Ave	8/31/2013
A	2300 blk Warring St	8/29/2013
B	2300 blk Warring St	8/30/2013
B	2700 blk Channing Way	8/28/2013
B	2700 blk Channing Way	8/27/2013
A	2400 blk Derby St	9/7/2013
A	2600 blk Regent St	9/7/2013
A	2000 blk Kittredge St	9/12/2013

A	1500 blk Alcatraz Ave	9/14/2013
A	2900 blk Channing Way	9/14/2013
A	2500 blk Fulton St	9/14/2013
A	2400 blk Blake St	9/15/2013
A	2100 blk Oregon St	9/14/2013
A	2600 blk Regent St	9/14/2013
A	2300 blk Fulton St	9/14/2013
A	2500 blk Fulton St	9/14/2013
A	2400 blk Blake St	9/15/2013
A	2800 blk Derby St	9/22/2013
A	2200 blk Parker St	9/21/2013
A	2200 blk Blake St	9/20/2013
A	1400 9th St	9/22/2013
A	2400 blk Dwight Way	9/22/2013
A	2300 blk Dwight Way	9/22/2013
A	2400 blk Dwight Way	9/21/2013
A	1200 blk Ashby Ave	9/21/2013
A	2400 blk Piedmont Ave	9/20/2013
B	2700 blk Bancroft Way	9/20/2013
A	2300 blk Ellsworth St	9/20/2013
A	2500 blk Hillegass Ave	9/21/2013
A	1500 blk Tyler St	9/22/2013
A	2400 blk Ellsworth St	9/27/2013
A	2600 blk Dana St	9/28/2013
A	2400 blk Prospect St	9/28/2013
A	2300 blk Warring St	9/28/2013
A	2600 blk Regent St	9/28/2013
A	2400 blk Warring St	9/27/2013
A	2800 blk Derby St	10/5/2013
A	2400 blk Haste St	10/5/2013
A	2400 blk Ellsworth St	10/6/2013
A	2400 blk Haste St	10/5/2013
B	2800 blk Derby St	10/5/2013
A	1800 blk Spruce St	10/13/2013
A	2500 blk 8th St	10/12/2013
A	2700 blk College Ave	10/12/2013
A	2500 blk College Ave	10/12/2013
A	2000 blk Cedar St	10/13/2013
A	2400 blk Stuart St	10/18/2013
A	2700 blk Bancroft Way	10/19/2013
A	2300 blk College Ave	10/19/2013
A	1800 blk Rose St	10/27/2013
A	2700 blk Channing Way	10/27/2013
A	2500 blk Benvenue Ave	10/26/2013
A	2400 blk Warring St	10/27/2013
A	2300 blk Piedmont Ave	10/31/2013
B	2700 blk Bancroft Way	10/31/2013
A	2100 blk Dwight Way	11/15/2013
A	2400 blk Prospect St	11/17/2013
A	2500 blk Benvenue Ave	11/17/2013
A	2000 blk Haste St	11/23/2013
B	2400 blk Prospect St	12/11/2013
B	2700 blk Bancroft Way	12/29/2013

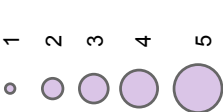
Attachment 6
SECOND RESPONSE
CALLS FOR SERVICE

2013

Number of B calls



Number of A calls



This map is for reference
purposes only
January 14, 2014

