



## MEMORANDUM REPORT

July 26, 2005

TO: County Council

FROM: Craig Howard, Legislative Analyst <sup>CH</sup>  
Karen Yoskowitz, Research Assistant <sup>KY</sup>  
Office of Legislative Oversight

SUBJECT: **OLO Memorandum Report 2005-7: Implementation of Council Actions on OLO Report 2002-1 (*Enforcing the Alcohol Age-of-Sales Laws in Montgomery County*)**

This memorandum report responds to the Council's request to review whether the Council's recommendations for action on previous years' OLO projects have been implemented. This report reviews the implementation status of recommendations from OLO Report 2002-1, *Enforcing the Alcohol Age-of-Sales Laws in Montgomery County*.

The report is organized as follows:

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## **PART A: INTRODUCTION**

**Authority.** Council Resolution 15-710, FY 2005 Work Program of the Office of Legislative Oversight, adopted July 27, 2004.

**Scope of Report.** In July 2002, based upon review of OLO Report 2002-1, the Council endorsed a package of recommendations to improve the County's alcohol age-of-sales compliance check program.

This follow-up project tracks the implementation of the recommendations, as contained in an August 22, 2002 memorandum to the Chief Administrative Officer from the Council President.

**Methodology and Acknowledgements.** OLO gathered information for this follow-up project through general research, document reviews, and interviews with Executive Branch staff. OLO worked with Executive Branch staff from the Office of the Board of License Commissioners (BLC) and the Police Department (MCPD) to compile the information presented in this memorandum report. OLO circulated a draft of the report to BLC and MCPD staff. This final report incorporates the technical edits received.

OLO greatly appreciates the time and contributions made by Dennis Theoharis, Office of the Board of License Commissioners; and Captain Tom Didone and Sergeant Bill Whelan, Montgomery County Police Department.

## **PART B: OVERVIEW OF OLO REPORT 2002-1**

OLO Report 2002-1 found that Montgomery County utilizes compliance checks as one method to enforce alcohol age-of-sales laws in the County. Compliance checks involve using underage buyers to attempt to purchase alcohol from licensed establishments. In Montgomery County, both the Office of the Board of License Commissioners (BLC) and the Montgomery County Police Department (MCPD) conduct alcohol age-of-sales compliance checks.

While recognizing that reducing alcohol sales to minors will not eliminate underage drinking, the report recommended that Montgomery County maintain a vigorous program of compliance checks as part of an overall strategy to discourage alcohol consumption by persons under 21. Reasons to continue to utilize compliance checks include:

- The empirical research shows that a well-designed compliance check program does reduce alcohol sales to underage persons;
- Compared to other strategies used to enforce alcohol age-of-sale laws, compliance checks are relatively easy, quick, and less expensive;

- A well-publicized compliance check program provides an opportunity to reinforce a community norm that the sale of alcohol to minors is unacceptable; and
- The County's responsibility to strictly enforce the alcohol age-of-sales laws seems particularly important because of the unique role the County has both in selling alcohol and licensing establishments to sell alcohol.

OLO Report 2002-1 recommended several changes to improve the effectiveness and efficiency of the County's compliance check program. The report's recommendations addressed the following issues:

- Gaps in communication and coordination of compliance checks, primarily between the Board of License Commissioners and the Police Department;
- The swiftness and severity of the penalties to licensees who sell alcohol to underage persons;
- Publicizing the results of compliance checks and the subsequent penalties; and
- Penalizing County-owned liquor stores and private retailers equitably.

## **PART C: LEGISLATIVE ACTION**

The Council released OLO Report 2002-1 on February 12, 2002. The Council's Public Safety Committee held two worksessions on this report, on April 4, 2002 and July 18, 2002. At the two worksessions, the Public Safety Committee reviewed the report and endorsed a series of recommendations related to compliance checks for Council consideration.

The Council formally approved a package of seven recommendations to improve the County's alcohol age-of-sales compliance check program on July 30, 2002. On August 22, 2002, the Council President sent a memo to the Chief Administrative Officer (attached at ©1) detailing the seven recommendations.

- 1) **Develop an inter-departmental plan for a well-coordinated compliance check program.** The County offices involved with conducting compliance checks and/or pursuing the resultant administrative/criminal penalties should agree (in writing) on the parameters of a well-coordinated compliance check program. The issues to address included: the respective roles of the Board of License Commissioners and Police Department in carrying out compliance checks, shared data collection and reporting, and target time frames and agreed-upon procedures for pursuing administrative and criminal penalties.
- 2) **Ensure "swift" adjudication of sale-to-minor cases.** The County should place high priority on adjudicating alleged sale-to-minor violations as quickly as possible. The

Council endorsed a target deadline of 20 days for sending a letter of Offer and Compromise (used typically with first time offenders) and 120 days for action on a case requiring a show cause hearing. The Council encouraged Executive staff to be innovative in their attempts to reduce the time that the Board of License Commissioners takes to consider and act on cases involving underage alcohol sales.

- 3) **Inform licensees in writing whether their establishment passes or fails a compliance check.** At the time of the report, a licensee always learned when his/her establishment failed a compliance check but only sometimes learned when it passed – meaning that the clerk/server refused to sell alcohol to an underage buyer. To parallel a practice found in other places, the Council recommended sending a fact-based follow-up letter to licensees who pass a compliance check. In addition to providing positive feedback to a licensee for doing something correctly, such a practice helps to remind licensees that the County is routinely conducting compliance checks.
- 4) **Provide semi-annual reports to the Council on the compliance check program.** The Council requested semi-annual status reports from the Executive Branch on the County's compliance check program, with one report submitted each year by January 15 and another by July 15. The Council requested that each report include information on the numbers of compliance checks conducted by the Police Department and Office of the BLC, their respective rates of compliance, elapsed time between reported violations and case resolution, and penalties imposed.
- 5) **Continue to explore increased use of identification scanner technology.** The County should continue to explore the use of identification (ID) scanners both in County-owned liquor stores and in privately-owned establishments. The Council noted that the Department of Liquor Control (DLC) planned to pilot the use of ID scanners in fall 2002, and requested that DLC report back on the results of the pilot by the FY04 operating budget worksessions.
- 6) **Increase media coverage of the County's efforts to enforce the alcohol age-of-sales laws.** In order to enhance the deterrent effect of compliance checks, the County should continue its concerted effort to increase general community awareness about the County's compliance check program, publicize compliance check results, and publicize the penalties imposed upon establishments that sell alcohol to underage persons. The Council requested to be kept informed about the outcome of discussions with the print media about publishing names of licensed establishments whose license is suspended or revoked as the result of an underage alcohol sale violation.
- 7) **Equitably deal with County-owned liquor stores that sell alcohol to an underage person.** The Department of Liquor Control deserves recognition for taking punitive action against the individual employees in County-owned stores who sell alcohol to an underage person. However, just as a licensee of a private retail establishment is held accountable for the sale of alcohol to a minor in his/her place of business, the Council encouraged continued efforts to appropriately hold store managers accountable when a sale-to-minor occurs in a County-owned store.

## PART D: CURRENT IMPLEMENTATION STATUS

This section details the current implementation status of each of the seven Council-endorsed recommendations. The implementation meets the Council's goal of improving upon an already strong alcohol compliance check program. The table below summarizes the overall status, and detailed information on the implementation of each recommendation follows.

	<b>Recommendation</b>	<b>Implementation Status</b>
#1	Develop an inter-departmental plan for a well-coordinated compliance check program.	Completed
#2	Ensure "swift" adjudication of sale-to-minor cases	Ongoing
#3	Inform licensees in writing whether their establishment passes or fails a compliance check.	Completed
#4	Provide semi-annual report to the Council on the compliance check program.	Ongoing
#5	Continue to explore increased use of identification scanner technology.	Completed
#6	Increase media coverage of the County's efforts to enforce the alcohol age-of-sales laws.	Completed
#7	Equitably deal with County-owned liquor stores that sell alcohol to an underage person.	Not Completed*

\*In FY04 and FY05 there were no sale-to-minor violations at County-owned liquor stores.

### **Status of Recommendation #1: Develop an inter-departmental plan for a well-coordinated compliance check program.**

This recommendation included both a coordination component and a data sharing component, and the status of each is described separately below.

**Coordination.** In FY03, the Office of the Board of License Commissioners (BLC) and the Montgomery County Police Department (MCPD) developed a coordination plan for alcohol compliance checks. Under this plan, BLC and MCPD are each responsible for conducting 300 compliance checks annually. In addition, the BLC is responsible for conducting compliance checks on each of the County's 25 liquor stores every year.

The coordination framework was originally developed in a written DRAFT Compliance Check Action Plan reviewed during the Public Safety Committee's July 18, 2002 worksession (attached at ©4). Since that point, the Office of the BLC and MCPD have verbally agreed to maintain that framework for alcohol age-of-sales compliance checks.

MCPD and BLC staff report that they communicate regularly to discuss compliance check matters, including:

- Quarterly meetings with both front-line inspectors and management staff; and
- Annually coordinating the list of establishments scheduled to receive alcohol age-of-sales compliance checks.

**Data Collection and Reporting.** The Office of the BLC and MCPD enter data on compliance checks through a shared database maintained by BLC. Information in the database includes:

- The date of a compliance check;
- The agency that conducted the check;
- The date when an Offer and Compromise letter was sent and the date a reply was received, if applicable;
- The date when a letter for a Show Cause Hearing was sent and the date of the Hearing, if applicable; and
- The result of the compliance check and the final disposition of the case.

Each agency is responsible for entering the information on every alcohol age-of-sales compliance check it conducts into the database. BLC staff report entering their initial data within two days of a compliance check. MCPD staff report entering their initial data within seven days of a compliance check and sending the BLC a copy of the police report for any violations.

Using data provided by BLC staff, Table 1 shows a breakdown of the number of alcohol age-of-sales compliance checks conducted by agency for FY03, FY04, and FY05. The data show that BLC has met the 300 annual compliance checks goal for the past three years, and MCPD met the goal in FY03. MCPD reports that the Alcohol Unit (which manages MCPD's compliance check program) was understaffed beginning in FY04 in order to meet other department priorities, and the Unit was not fully-staffed again until May 2005.

**TABLE 1: MONTGOMERY COUNTY ALCOHOL AGE-OF-SALES COMPLIANCE CHECKS  
FY03-05**

Year	BLC		MCPD		Total	
	Checks	Violations	Checks	Violations	Checks	Violations
FY03 (Violation Rate)	352	25 (7%)	318	72 (23%)	670	97 (14%)
FY04 (Violation Rate)	339	17 (5%)	167	14 (8%)	506	31 (6%)
FY05 (Violation Rate)	325	17 (5%)	118	14 (12%)	443	31 (7%)

Source: Office of the Board of License Commissions, July 2005

**Status of Recommendation #2: Ensure “swift” adjudication of sale-to-minor cases.**

For cases where a sale-to-minor occurs, the Office of the Board of License Commissioners established as its adjudication targets the Council-endorsed deadlines of 20 days for sending a letter of Offer and Compromise and 120 days for action on a case requiring a show cause hearing. Using data provided by the Office of the BLC from the alcohol compliance check database, OLO analyzed the performance in meeting these target deadlines.

**Offer and Compromise Letter.** For cases in which a letter of Offer and Compromise was sent in response to a sale-to-minor violation and complete data for the case was available, OLO calculated the elapsed time (in days) between when a violation occurred and when BLC sent an Offer and Compromise letter.<sup>1</sup>

Table 2 shows data for each fiscal year (FY03-FY05) since the adoption of the 20 day target. The data show:

- The average elapsed time between a violation and an Offer and Compromise letter was around the 20 day goal in FY03 and FY04, and increased to 36 days in FY05; and
- The percent of cases with an elapsed time meeting the 20 day goal was above 60% in FY03 and FY04, and decreased to 18% in FY05.

**TABLE 2: ELAPSED TIME FOR A LETTER OF OFFER AND COMPROMISE  
FY03-FY05**

Year	Average	Range	Number of Cases	% of Cases Meeting Goal
FY03	19 days	1 to 45 days	N=56	61%
FY04*	23 days	7 to 107 days	N=18	61%
FY05	36 days	17 to 47 days	N=11	18%

\*One case in FY04 had an elapsed time of 107 days, the next longest elapsed time was 41 days.

Source: Office of the Board of License Commissioners and OLO, July 2005

**Show Cause Hearing.** For cases that required a Show Cause Hearing in response to a sale-to-minor violation and complete data for the case was available, OLO calculated the elapsed time (in days) between when a violation occurred and the date of the Show Cause Hearing.<sup>1</sup> Table 3 shows data for each fiscal year (FY03-FY05) since the adoption of the 120 day target. The data show:

<sup>1</sup> For sale-to-minor violations from MCPD, OLO used the date when the BLC received notice of the violation for the elapsed time calculation instead of the actual date of the violation.

- The average elapsed time between a violation and a Show Cause Hearing is below the 120 day goal each year; and
- The percent of cases with an elapsed time meeting the 120 day goal increased from 70% in FY03 to 91% in FY04.

**TABLE 3: ELAPSED TIME FOR A SHOW CAUSE HEARING  
FY03-FY05**

<b>Year</b>	<b>Average</b>	<b>Range</b>	<b>Number of Cases</b>	<b>% of Cases Meeting Goal</b>
FY03	110 days	46 to 239 days	N=20	70%
FY04	76 days	27 to 133 days	N=11	91%
FY05	111 days	75 to 129 days	N=3	33%

Source: Office of the Board of License Commissioners and OLO, July 2005

**Status of Recommendation #3: Inform licensees in writing whether their establishment passes or fails a compliance check.**

The Office of the BLC sends form letters to licensees notifying them when they have passed a compliance check. The letters state that their establishment was checked for compliance with County and state alcoholic beverage laws, and that an individual under age 21 who works for Montgomery County was refused alcohol at their establishment. The Chief of Police and the Chairman of the Board of License Commissioners co-sign the letter, which includes the date that the compliance check occurred. A copy of a letter is attached at ©8.

**Status of Recommendation #4: Provide semi-annual report to the Council on the compliance check program.**

The Office of the BLC staff provide a report to the Council’s Public Safety Committee during the annual worksession on BLC’s budget. No other formal reporting mechanism to the Council exists.

**Status of Recommendation #5: Continue to explore increased use of identification scanner technology.**

The BLC sent a letter to all licensees recommending that they purchase a driver’s license or identification (ID) scanner. The BLC has the authority to fine, revoke, or suspend an establishment’s alcohol license, but cannot require a licensee to buy an ID scanner as part of a BLC-imposed penalty. The letter sent by the BLC included a list of companies known to make ID scanners, and this list is also available on the BLC website. The cost of a scanner is approximately \$1,000. BLC staff report that ID scanners can be effective, but require training to ensure that employees know how to utilize them correctly.



The Department of Liquor Control piloted the use of ID scanners in several County liquor stores in FY03. After the pilot period, the Department expanded the program and now has two ID scanners in each County-owned liquor store.

**Status of Recommendation #6: Increase media coverage of the County's efforts to enforce the alcohol age-of-sales laws.**

The BLC began publicizing alcohol license violations in March 2003. The weekly "Montgomery Section" of the *Washington Post* lists all Montgomery County alcohol license violations, including alcohol age-of-sales violations, the fourth week of each month. The list of violations includes:

- The name of the facility in which the violation occurred;
- The type of violation;
- The penalty assessed; and
- Whether the facility had prior alcohol license violations.

**Status of Recommendation #7: Equitably deal with County-owned liquor stores that sell alcohol to an underage person.**

The BLC conducts alcohol compliance checks at the 25 County-owned liquor stores at least once a year. In FY04 and FY05, there were zero sale-to-minor violations in Department of Liquor Control (DLC) facilities.

When sale-to-minor violations have occurred at DLC stores in the past (there were two in FY03), BLC did not participate in disciplinary action against DLC employees. Office of the BLC staff reports that the DLC has departmental policies related to disciplinary action against employees who sell alcohol to minors. These DLC penalties include a one-week suspension of the employee's pay for a first violation and a two-week suspension of pay for a second violation.

## **PART E: DISCUSSION ISSUES**

The implementation of the Council-endorsed recommendations by Executive Branch staff meets the Council's goal of improving upon an already strong alcohol compliance check program. To both acknowledge these enhancements and explore opportunities for further improvement, OLO recommends that the Public Safety Committee hold a worksession to discuss the implementation status and overall compliance check program with both BLC and Police Department staff.

OLO recommends that the Committee discussion focus on the improvements in coordination and information sharing within the County's age-of-sales compliance check program. Specific discussion issues for the worksession could include:

- Is the annual target of 300 alcohol compliance checks for MCPD appropriate given staffing/resource constraints?
- How has the shared database improved coordination, and are there any additional improvements that could be made to enhance the data entry, report sharing, and Offer and Compromise letter processes?
- Should the Office of the BLC include its performance in meeting the 20 day Offer and Compromise Letter and 120 day Show Cause Hearing goals as part of its annual performance measures?
- Would the Committee like more regular updates on the compliance check program data and results?



## MONTGOMERY COUNTY COUNCIL


ROCKVILLE, MARYLAND

OFFICE OF THE COUNCIL PRESIDENT

### MEMORANDUM

August 22, 2002

TO: Bruce Romer, Chief Administrative Officer

FROM: Steven Silverman, Council President 

SUBJECT: **The County's Alcohol Age-of-Sales Compliance Check Program**

The Council shares the Executive's concerns about underage drinking in the County and supports the Executive's overall approach of using multiple strategies to address this problem. The Council recognizes that, in comparison to many other jurisdictions that give minimal attention to drinking age enforcement, the County allocates significant resources to a variety of programs aimed at dealing with the problem of underage drinking.

The Council understands that commercial establishments are not the primary source of alcohol for persons under 21, and that studies consistently report adults over 21 as the most common source of alcohol for underage drinkers. This fact further supports the County's approach of using compliance checks of commercial establishments as one among a variety of strategies aimed at reducing the availability of alcohol to underage persons.

It is within this context that the Council endorsed a package of recommendations to improve the County's alcohol age-of-sales compliance check program. The full Council formally approved these recommendations in late July, based upon review of Office of Legislative Oversight Report 2002-1, *Enforcing the Alcohol Age-of-Sales Laws in Montgomery County*.

The Council recognizes that, during the past several months, Executive staff have already implemented some changes that directly relate to these recommendations. The Council requests that Executive staff keep the Council informed about the continued improvements to the compliance check program.

## SUMMARY OF COUNCIL RECOMMENDATIONS

1. **Develop an inter-departmental plan for a well-coordinated compliance check program.** The County offices involved with conducting compliance checks and/or pursuing the resultant administrative/criminal penalties should agree (in writing) on the parameters of a well-coordinated compliance check program.

The issues to address include: the respective roles of the Board of License Commissioners and Police Department in carrying out compliance checks, shared data collection and reporting, and target time frames and agreed-upon procedures for pursuing administrative and criminal penalties.

The Council understands that Executive staff are working to finalize a Compliance Check Action Plan, and that this Action Plan will address the coordination issues identified above.

2. **Ensure “swift” adjudication of sale-to-minor cases.** The County should place high priority on adjudicating alleged sale-to-minor violations as quickly as possible. The Council endorses a target deadline of 20 days for sending a letter of Offer and Compromise (used typically with first time offenders) and 120 days for action on a case requiring a show cause hearing. The Council encourages Executive staff to be innovative in their attempts to reduce the time that the Board of License Commissioners takes to consider and act on cases involving underage alcohol sales.
3. **Inform licensees in writing whether their establishment passes or fails a compliance check.** Under current practice, a licensee always learns when his/her establishment fails a compliance check but only sometimes learns when it passes meaning that the clerk/server refused to sell alcohol to an underage buyer. To parallel a practice found in other places, the Council believes the County should consistently send a *fact-based* follow-up letter to licensees who pass a compliance check. In addition to providing positive feedback to a licensee for doing something correctly, such a practice helps to remind licensees that the County is routinely conducting compliance checks.
4. **Provide semi-annual reports to the Council on the compliance check program.** The Council requests semi-annual status reports from the Executive on the County’s compliance check program, with one report submitted each year by January 15 and another by July 15. Each report should include information on the numbers of compliance checks conducted by the Police Department and Office of the BLC, their respective rates of compliance, elapsed time between reported violations and case resolution, and penalties imposed.

5. **Continue to explore increased use of license scanner technology.** The County should continue to explore the use of license scanners both in County-owned liquor stores and in privately-owned establishments. The Council understands that the Department of Liquor Control (DLC) plans to pilot the use of license scanners in several liquor stores this fall, and requests that DLC report back on the results of the pilot by next year's (FY 04) operating budget worksessions.
6. **Increase media coverage of the County's efforts to enforce the alcohol age-of-sales laws.** In order to enhance the deterrent effect of compliance checks, the County should continue its concerted effort to increase general community awareness about the County's compliance check program, publicize compliance check results, and publicize the penalties imposed upon establishments that sell alcohol to underage persons. The Council requests to be kept informed about the outcome of discussions with the print media about publishing names of licensed establishments whose license is suspended or revoked as the result of an underage alcohol sale violation.
7. **Equitably deal with County-owned liquor stores that sell alcohol to an underage person.** The Department of Liquor Control deserves recognition for taking punitive action against the individual employees in County-owned stores who sell alcohol to an underage person. However, just as a licensee of a private retail establishment is held accountable for the sale of alcohol to a minor in his/her place of business, the Council encourages your continued efforts to appropriately hold store managers accountable when a sale-to-minor occurs in a County-owned store.

In addition to these recommendations the Council plans to hold at least one annual meeting with member of the Board of License Commissioners, with the first meeting to take place before the end of this calendar year.

The Council once again thanks Executive staff for their cooperation with the Office of Legislative Oversight throughout the course of OLO's study, and with the Public Safety Committee during the series of Committee worksessions held earlier this year. We look forward to continuing to work with you to reduce underage drinking in Montgomery County.

cc: Dr. Charles Moose, Chief of Police  
Ellsworth Naylor, Chair, Board of License Commissioners  
Dennis Theoharis, Executive Director, Board of License Commissioners  
George Griffin, Acting Director, Department of Liquor Control  
Bill Mooney, Assistant Chief Administrative Officer

**DRAFT**

**MEMORANDUM**

July 15, 2002

TO: Phil Andrews, Chairman  
Public Safety Committee

FROM: Bruce Romer  
Chief Admin. Officer

SUBJECT: FY 03 Compliance Check Action Plan

The Board of License Commissioners (BLC), the Department of Police (MCPD), and the Office of Public Information (PIO) will implement in FY 03 the following compliance check action plan:

**Enforcement Hearings**

Board of License Commissioners:

- Schedule additional enforcement hearings before the BLC to ensure "swift" resolution to alcoholic beverage violations (subject to additional BLC FY 03 supplemental funding to be approved by the County Council).
- Violations shall be resolved within 120 days of the violation date, or within 120 days of the refusal by the licensee to accept an offer and compromise settlement.

## **Compliance Check Coordination:**

BLC/MCPD:

- BLC and MCPD representatives will meet quarterly to select and allocate the compliance check workload distribution. Each department will conduct compliance checks from the BLC database which will include all classifications of alcohol beverage licenses.
- It is the intent of the BLC and MCP to conduct random compliance checks of all alcoholic beverage licensed facilities in Montgomery County. Utilizing a collaborative approach, the BLC and MCP will rotate the compliance checks to ensure that all facilities are checked, prior to conducting subsequent checks. Exceptions to this policy would include facilities that are the subject of complaints regarding underage sales or where compliance checks have resulted in sales. In those situations, additional compliance checks will be conducted as necessary.

## **Compliance Check Enforcement:**

BLC:

- Alcohol Enforcement Specialists and under 21 Government Aide employees shall conduct the compliance checks.
- Three hundred (300) alcoholic beverage license facility compliance checks will be conducted annually.
- Develop and implement a compliance check network data base accessible to both BLC and MCPD. The database will serve as a data entry and retrieval system which will provide individual license facility compliance check information, and overall compliance check program statistical information. All

compliance checks conducted will be entered into the database within seven (7) days of completion. The BLC shall be responsible for completion of the database "Resolution" field.

- Coordination and resolution of all compliance check violations scheduled for alcoholic beverage license enforcement action.

**MCP:**

- MCP trained Alcohol Enforcement Specialist (AES) Officers and under 21 Police Interns shall conduct the compliance checks.
- A targeted goal of three hundred (300) alcoholic beverage license facility compliance checks will be conducted annually.
- A listing of compliance checks conducted, and subsequent event reports will be forwarded to the BLC within seven (7) days of completion. In addition, all compliance checks conducted will be entered into the database within seven (7) days of completion. The MCPD will be responsible for completion of the "District" field.
- AES Officers and Police Interns who participated in compliance check violations will appear at the BLC alcoholic beverage license enforcement hearing upon receiving notification from the BLC as to the date, time, and location of the hearing.

**Compliance Check Publicity:**

**BLC/MCPD/PIO:**

- The MCPD will coordinate the release of press information regarding on-going underage compliance checks with the BLC and PIO, with at least quarterly reports.
- The BLC will coordinate the monthly dissemination of compliance check enforcement hearing resolutions with the PIO for distribution through the identified media source.



Several of the above-cited actions are in unison with recommendations proposed in OLO Report 2002-1. This action plan memorandum will provide for a coordinated and cooperative effort between

DATE

Dear Licensee(s):

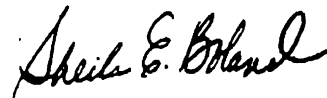
On DATE OF COMPLIANCE CHECK your alcoholic beverage license establishment was checked for compliance with county and state alcoholic beverage laws. An individual under 21 years of age who works for Montgomery was refused alcoholic beverage service in your establishment.

Our compliance check program is an important enforcement strategy in preventing alcohol sales in Montgomery County to individuals under 21 years of age. We appreciate your continued cooperation in the enforcement of state and county alcoholic beverage laws.

If you have any questions regarding our compliance check program please contact The Office of the Board of License Commissioners at 240-777-1999.



J. Thomas Manger  
*Chief of Police*



Sheila E. Boland, *Chairman*  
*Board of License Commissioners*