STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	IN THE COURT OF GENERAL SESSIONS THIRTEENTH JUDICIAL CIRCUIT
State of South Carolina	STATE'S COMBINED RESPONSE TO MOTIONS TO QUASH INDICTMENTS
vs.	2018-GS-23-2466A through F 2018-GS-23-2467A 2019-GS-23-1146A through F 2019-GS-23-1147A
William D. Lewis, Defendant.	

The State, by and through Sixteenth Circuit Solicitor Kevin Brackett, hereby responds to Defendant's Motions to Quash Indictments as follows:

A. The common law offense of misconduct in office has a long, valid history as an indictable offense to combat corruption and misconduct by public officials.

Defendant's claim that common law misconduct in office is not an indictable offense ignores the existing law and records of this state. South Carolina court administration recognizes the offense of common law misconduct in office with CDR code 0819. Since the beginning of the fiscal year in 2000 through the end of the 2017 fiscal year, court administration has recorded 203 guilty pleas to common law misconduct in office and 15 guilty verdicts. *See* Exhibit A. One of the 16 guilty pleas in the fiscal year from 2017-2018 is that of former South Carolina Senator John Courson, and the current fiscal year has logged the jury trial conviction of former South Carolina Representative Jim Harrison. Of note as to these recent, high profile cases is that those defendants, and particularly Courson, unsuccessfully raised nearly identical arguments about common law misconduct in office. As such, the analysis that follows borrows heavily from work done by First Circuit Solicitor David Pascoe and his staff in the aforementioned prosecutions. Additionally Judge Mullen's written order in denying Courson's motions, though not binding, engages in an analysis of several of Defendant's arguments. *See* Exhibit B.

The law cited by Defendant in his motion betrays his argument regarding the alleged invalidity of common law misconduct in office. Defendant misconstrues the commentary of the court in *State v. Hess*, 279 S.C. 14, 19, 301 S.E.2d 547, 550 (1983), that "South Carolina has no cases applying the common law of misconduct in office" as a declaration that no such offense exists in the state. Instead, however, that opinion itself affirms a jury trial conviction for common law misconduct in office. *Id.* That opinion, then, extinguishes any pre-existing doubt about the validity of the offense despite the dearth of prior case law.

Defendant's argument that the Ethics Act of 1829, now codified at S.C. Code Annotated § 8-1-80 (1976, as amended), superseded the common law offense for misconduct in office similarly fails to withstand scrutiny. While *State v. Sellers*, 41 S.C.L. 368, 371 (1854), discusses the intent of the legislature in the enactment of the Ethics Act of 1829, that court never undertook an analysis of the implications of the Act as to common law offenses. Exploration of the latter analysis confirms the continued validity of common law misconduct in office.

Common law misconduct in office remains viable because no South Carolina law alters or is inconsistent with the offense. The legislature specifically adopted the common law as follows:

> All, and every part, of the common law of England, where it is not altered by the Code or inconsistent with the Constitution or laws of this State, is hereby continued in full force and effect in the same manner as before the adoption of this section.

S.C. Code Ann. § 14-1-50 (1976, as amended). When determining whether the common law is altered or inconsistent with the laws of this state, the courts follow the premise that "the common law will not be impliedly changed . . . only by clear and unambiguous legislative enactment will the settled rules of common law be eroded." *State v. Carson*, 274 S.C. 316, 319, 262 S.E.2d 918, 920 (1980). In other words, "Common law offenses are not abrogated simply because there is a statutory offense proscribing similar conduct." *State v. Prince*, 316 S.C. 57, 66, 447 S.E.2d 177, 182 (1993) (quoting McAninch and Fairey, *The Criminal Law of South Carolina*, 39 (2d

Ed.1989)). Instead, "it is presumed that no change in common law is intended unless the Legislature explicitly indicates such an intention by language in the statute." *Id.* In light of these guiding principles, it comes as no surprise that Defendant could not cite support for his proposition that the Ethics Act of 1829 superseded common law misconduct in office.

The Ethics Act of 1829 neither altered nor is inconsistent with common law misconduct in office. The Act by its terms makes no mention of common law misconduct in office and therefore should not be read to supersede the offense by implication. *See* Exhibit C. Additionally, common law misconduct in office and the statutory offense created by the Act coexist under the law because the offenses address issues related to misconduct and corruption in different ways. Common law misconduct in office is a specific intent crime that requires willful wrongdoing. *See Hess*, 279 S.C. at 20, 301 S.E.2d at 551 ("[T]he wilful and dishonest character of appellant's conduct was the threshold fact issue to be determined by the jury."). The statutory offense, in contrast, may be violated by both willful misconduct and habitual negligence. *See* S.C. Code Ann. § 8-1-80 (1976, as amended). But while the statutory offense encompasses a greater scope of behavior, it applies only to public officers whose authority is limited to a single election or judicial district. *Id.* Common law misconduct in office, meanwhile, applies more broadly to all individuals in public office. *State v. Thrift*, 312 S.C. 282, 308-09, 440 S.E.2d 341, 355-56 (1994). Because statutory laws did not erode the common law and because statutory and common law misconduct in office are different, both offenses continue to be viable tools to combat corruption and misconduct by public officials.

B. The indictments against Defendant allege separate and distinct offenses capable of simultaneous prosecution without offending the concept of double jeopardy.

An extension of Defendant's argument that the statutory offense of misconduct in office superseded the common law offense, Defendant argues that double jeopardy prohibits his

prosecution for multiple offenses where the underlying conduct in support of those offenses is the same or similar. Defendant's pleadings, however, fail to undertake the analysis of double jeopardy claims prescribed by law.

The Double Jeopardy Clauses of the United States and South Carolina Constitutions protect individuals from being twice prosecuted for the same offense. *State v. Brandt*, 393 S.C. 526, 538, 713 S.E.2d 591, 597 (2011). The Clauses do not, however, prohibit multiple indictments and punishments where a single act consists of two or more "distinct" offenses. *Id.* (quoting *State v. Moyd*, 321 S.C. 256, 258, 468 S.E.2d 7, 9 (Ct. App. 1996)). The "sole test" for "distinct" offenses in the context of double jeopardy is the "same elements" test established in *Blockburger v. United States*, 284 U.S. 299, 52 S.Ct. 180 (1932). *Id.* (quoting *State v. Cuccia*, 353 S.C. 430, 438, 578 S.E.2d 45, 49 (Ct. App. 2003)). In this analysis "multiple punishment is not prohibited where each offense calls for proof of a fact that the other does not." *Cuccia*, 353 S.C. at 438, 578 S.E.2d at 49. Pursuant to this test, the indictments pending against Defendant allege multiple offenses without running afoul of double jeopardy.

Despite the similarity in name, the common law offense "Misconduct in Office" and the statutory offense "Misconduct of a Public Officer" present distinct offenses under the "same elements" test. As explained above, statutory and common law misconduct address issues related to misconduct and corruption in different ways. The statutory offense requires proof of an elected official though the common law does not. Meanwhile the common law offense requires proof of willful misconduct though the statutory offense does not. Therefore neither offense is a subset of the other and the charges are capable of simultaneous prosecution.[1]

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[1] This double jeopardy argument was similarly made and rejected by Judge Mullen in State v. Courson. Exhibit B.

Depending on the circumstances in which it is made, the single act of making a false statement may give rise to multiple distinct offenses. Common law misconduct requires proof that the false statement was willfully made by a public official in violation of a duty imposed by the common law. *See Hess*, 279 S.C. at 20, 301 S.E.2d at 550. Statutory misconduct requires proof that the false statement was made by an elected official. *See* S.C. Code Ann. § 8-1-80 (1976, as amended). And perjury requires proof of the false statement "on a document, record, report, or form required by the laws of this State." S.C. Code Ann. § 16-9-10(A)(2) (1976, as amended). Each of these offenses requires proof of an element not contained in the others, making them distinct under the law.

The same analysis applies to conduct that oppressed and intimidated Defendant's employees. Such conduct gives rise to a common law misconduct offense when willfully done by a public official in violation of a duty imposed by the common law. Such conduct gives rise to statutory misconduct when done by an elected official. And such conduct gives rise to the common law offense obstruction of justice when done with the intent to obstruct the administration of justice. Because each offense requires proof of an element not required by the others, double jeopardy is not implicated and Defendant's conclusory statements to the contrary cannot withstand scrutiny.

C. The South Carolina Legislature attached criminal consequences to misconduct in office separate and apart from any rules or regulations implemented by non-legislative entities.

Defendant additionally attacks the validity of the misconduct charges on grounds that they represent an unconstitutional delegation of legislative authority in that an individual could be criminally convicted of violations of rules and regulations that do not independently carry legislatively recognized criminal consequences. No such delegation occurred, however, when the legislature affirmatively acted to uphold common law offenses and to hold public officials to a

higher standard of conduct. *See* S.C. Code Ann. §§ 8-1-80 & 14-1-50 (1976, as amended). As discussed, both common law and statutory misconduct require proof of several elements before criminal consequences attach. A simple rule or regulation violation without more would not suffice, nor do these offenses require consideration of rules or regulations by a non-legislative entity to determine proof of an element. Certainly violations of rules and regulations could be relevant to whether a public official engaged in misconduct but such conduct in isolation would not rise to the level of common law or statutory misconduct as proscribed by law. Unless and until the State proves nothing more than a rule or regulation violation,[2] the Court need not further scrutinize Defendant's proposed hypotheticals. The indictments as they stand before the Court allege cognizable offenses.

D. Defendant has been afforded due process under the law.

In several motions Defendant alleges that the misconduct indictments violate his due process rights in that the offenses themselves and the pending indictments in particular are too vague. The first argument requires analysis of the misconduct charges under the rubric of a "void for vagueness" challenge and the latter requires an examination of the indictments in the context of their role as "notice" documents.[3] Neither argument merits the quashing of the indictments.

1. Misconduct in office, whether proscribed by the common law or statute, survives constitutional scrutiny.

Both the common law and statutory offenses of misconduct in office are sufficiently defined to satisfy constitutional requirements. "The concept of vagueness or indefiniteness rests on the constitutional principle that procedural due process requires fair notice and proper standards

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[2] Such an argument would more appropriately be made at the conclusion of the State's case in a motion for directed verdict.

[3] Defendant initially challenged the obstruction of justice indictment (2018-GS-23-2467A) as too vague but did not renew that argument, unlike other arguments, in more recent filings. The State submits that any alleged deficiency in the obstruction indictment has been cured by the superseding indictment that received a true bill on March 19, 2019. None of Defendant's motions challenge the perjury indictment (2019-GS-23-1147A) as too vague.

for adjudication." *State v. Albert*, 257 S.C. 131, 134, 184 S.E.2d 605, 606 (1971). "A law is unconstitutionally vague if it forbids or requires the doing of an act in terms so vague that a person of common intelligence must necessarily guess as to its meaning and differ as to its application." *State v. Michau*, 355, S.C. 73, 77, 583 S.E.2d 756, 758 (2003). But even so, "all the constitution requires is that the language [defining an offense] convey sufficiently definite warnings as to the proscribed conduct when measured by common understanding and practices." *Curtis v. State*, 345 S.C. 557, 572, 549 S.E.2d, 591, 599 (2001). In deciding whether language is sufficiently definite, courts also look "to see whether the allegedly unconstitutional statute has been interpreted or limited by prior judicial decisions." *Town of Mt. Pleasant v. Chimento*, 410 S.C. 522, 534, 737 S.E.2d 830, 838 (2012). Ultimately, "Statutes are to be construed in favor of constitutionality; the Court will presume a legislative act is constitutionally valid unless a clear showing to the contrary is made." *State v. Michau*, 355, S.C. 73, 76, 583 S.E.2d 756, 758 (2003). Indeed, the United States Supreme Court has noted:

> The root of the vagueness doctrine is a rough idea of fairness. It is not a principle designed to convert into a constitutional dilemma the practical difficulties in drawing criminal statutes both general enough to take into account a variety of human conduct and sufficiently specific to provide fair warning that certain kinds of conduct are prohibited.

Colten v. Kentucky, 407 U.S. 104, 110, 92 S. Ct. 1953, 1957, 32 L. Ed. 2d 584 (1972). And finally, "One to whose conduct the law clearly applies does not have standing to challenge it for vagueness." *Touissant v. State Bd. of Med. Examiners*, 303 S.C. 316, 320, 400 S.E.2d 488, 491 (1991).

a. Common law misconduct in office conveys sufficiently definite warnings as to the proscribed conduct and, in any event, Defendant lacks standing to challenge the offense.

Common law misconduct in office "occurs when duties imposed by law have not been properly and faithfully discharged." *Hess*, 279 S.C. at 20, 301 S.E.2d at 550. This requires proof

that a defendant is a public official, that there was a duty owed to the public, that the defendant breached the duty, and that the breach was done willfully and dishonestly. *See id.*; *Thrift*, 312 S.C. at 309, 440 S.E.2d at 356. That there is "a duty owed to the public is essential" and the common law is recognized to impose a duty of accountability on public officers which is assumed upon entry to public office. *Hess*, 279 S.C. at 20, 301 S.E.2d at 550-51. This accountability derives from the "common sense" idea that "[p]ublic officers must be impervious to corrupting influences and they must transact their business frankly and openly in the light of public scrutiny so that the public may know and be able to judge them and their work fairly." *Id.* (quoting *Driscoll v. Burlington-Bristol Bridge Co.*, (N.J.), 8 N.J. 433, 86 A.2d 201, 221 (1952)). Additionally, duties may be "imposed by a general statute or arise out of the very nature of the office." *State v. Weleck*, (N.J.), 10 N.J. 355, 366, 91 A.2d 751, 757 (cited favorably by *Hess*, 279 S.C. at 20, 301 S.E.2d at 550-51). These requirements for proof of common law misconduct are sufficiently definite standing alone and clearly apply to the allegations contained in the indictments against Defendant.

b. Statutory misconduct in office conveys sufficiently definite warnings as to the proscribed conduct and, in any event, Defendant lacks standing to challenge the offense.

Statutory misconduct criminalizes "any official misconduct, habitual negligence, habitual drunkenness, corruption, fraud, or oppression" by "[a]ny public officer whose authority is limited to a single election or judicial district." S.C. Code Ann. § 8-1-80 (1976, as amended). Defendant complains that the statute lacks definitions and posits that, because the offense can be committed in a variety of ways, it must be void for vagueness. The words of the statute, however, have common understandings and most are long recognized and defined in American jurisprudence. *See Black's Law Dictionary*, 10th ed. 2014 (defining "corruption," "misconduct," "official misconduct," and "oppression"). Additionally the statute, which is intended to hold public

officials accountable, clearly applies to the conduct enumerated in Defendant's indictments, giving him no standing in a void for vagueness challenge.

2. The pending indictments provide the notice required by law of the charges Defendant faces.

Apart from challenging the misconduct offenses themselves, Defendant submits that the particular allegations made against him in the indictments fail to inform him of that which he stands accused. In a criminal case, "[t]he indictment is a notice document." *State v. Gentry*, 363 S.C. 93, 102, 610 S.E.2d 494, 500 (2005). To determine the sufficiency of an indictment, courts look to whether:

> (1) the offense is stated with sufficient certainty and particularity to enable the court to know what judgment to pronounce, and the defendant to know what he is called upon to answer and whether he may plead an acquittal or conviction thereon; and (2) whether it apprises the defendant of the elements of the offense that is intended to be charged.

Id. at 102-03, 610 S.E.2d at 500. This analysis is undertaken "with a practical eye in view of all the surrounding circumstances" and "whether the indictment could be more definite or certain is irrelevant." *Id.* Ultimately, "Every indictment shall be deemed and judged sufficient and good in law which, in addition to allegations as to time and place . . . charges the crime substantially in the language of the common law or of the statute prohibiting the crime or so plainly that the nature of the offense charged may be easily understood . . . ." S.C. Code Ann. § 17-19-20 (1976, as amended).

Defendant's indictments sufficiently allege the misconduct charges contained therein to enable the court to know what judgment to pronounce, to inform Defendant that which he is called upon to answer, and to apprise Defendant of the elements of the offenses. As to place, the indictments are limited to Greenville County. As to time, the indictments are limited to the period in which Defendant served as Sheriff of Greenville County and, as to individual counts, the time

period is further narrowed when possible. Several of the allegations, however, involve conduct over a period of time. This is permissible because misconduct in office is "versatile" in nature such that it "may consist of one act or a series of acts." *State v. Hess*, 279 S.C. 525, 528, 309 S.E.2d 741, 743 (1983).[4] A continuous series of conduct may give rise to the offense, indictable in a single count, "even though such acts were committed on different days, and differ in their nature and constitute distinct offenses against the law, so long as they are cognate to the charge of official misconduct." *Id.* at 528, 309 S.E.2d at 743 (quotation omitted).

The indictments further allege each of the elements of the respective offenses. In regard to common law misconduct in office, each count includes allegations that Defendant held the public office of sheriff, that Defendant owed particular enumerated duties recognized in the common law or inherent in the nature of Defendant's public office,[5] that Defendant breached those duties by engaging in enumerated conduct, and that Defendant's breaches were willful and dishonest. In regard to statutory misconduct, each count includes the allegation that Defendant was a public officer whose authority was limited to a single election or judicial district and that he engaged in enumerated conduct amounting to official misconduct, corruption, fraud, or oppression as described in each count. These allegations sufficiently identify the misconduct charges against Defendant as required by the law.

Defendant's attempts to create ambiguity in each of the misconduct counts defy a plain reading of the indictments and overstate the detail required for sufficient notice. For example, Defendant asserts that count 2/B of the statutory misconduct indictment "fails to allege what act

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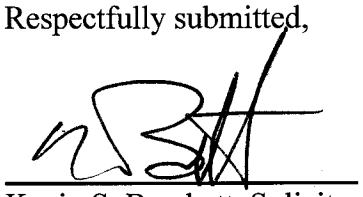
[4] Note that there are two *Hess* opinions by the Supreme Court, both of which provide relevant analysis of common law misconduct in office.

[5] Defendant's motions allege due process violations to the extent that certain counts fail to identify particular statutes that were violated. However, "where the duties are imposed by a general statute or arise out of the very nature of the office, the source of the duty need not be alleged in the indictment for the courts will take judicial notice of such duties." *Weleck*, (N.J.), 10 N.J. at 366, 91 A.2d at 757.

of fraud Mr. Lewis is to have committed" when the indictment plainly reads that Defendant "committed an act of fraud in violation of State law by falsely asserting . . . ." The act of "fraud" is a false assertion. Additionally, that the indictments could be more definite is of no moment. Defendant is on notice of the offenses which he is called upon to answer and has the benefit of discovery of the State's case to further inform him of particular details. The law requires nothing more.

Under scrutiny of the applicable legal analysis, each of Defendant's grounds for quashing his pending indictments fails. For the reasons stated herein, the State therefore requests that Defendant's motions to quash be DENIED.

Respectfully submitted,



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Date: 5/30/19

Year End	Guilty Plea	Guilty Trial	Total
2018	16	0	16
2017	6	2	8
2016	8	0	8
2015	11	2	13
2014	8	5	13
2013	6	0	6
2012	6	1	7
2011	2	0	2
2010	13	0	13
2009	10	0	10
2008	17	0	17
2007	39	2	41
2006	14	0	14
2005	5	0	5
2004	13	2	15
2003	12	0	12
2002	10	0	10
2001	7	1	8
Total	203	15	218

CDR 0819 (Misconduct in Office, Common Law)

South Carolina Judicial Department

General Sessions Dispositions by all Offenses

For Period 07/01/2017 Thru 06/30/2018 - Run Date 8/28/2018 - Program-ID CRM115

Code	Offense	Disp During Period	Guily Plea	Trial Guilty	Total Convict	Trial Not Guilty	Pros Ended Nol Pros	JUD Commit	JUD Dism	Non Convict	Remand	Disp at Prelim/ No Bill	Fail To Appear	Other	Total Other
2460	Minor/Purchase or posession of liquors	15	1	0	1	0	12	0	1	12	1	0	0	0	1
				0.0%		0.0%		0.0%				0.0%	0.0%	0.0%	
1257	Minor/Purchase, poss-beer/wine by minor	6	0	0	0	0	6	0	0	6	0	0	0	0	0
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
2443	Minor/Use minor to commit certain crimes	1	0	0	0	0	1	0	0	1	0	0	0	0	0
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
3828	Miscellaneous / General Sessions Misdemeanor Offense (Use only	1	1	0	1	0	0	0	0	0	0	0	0	0	0
				0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3554	Miscellaneous / General Sessions Misdemeanor Offense where no	6	1	0	1	1	4	0	0	5	0	0	0	0	0
				0.0%				0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
2990	Miscellaneous/ General Sessions Offense repealed and not	3	0	0	0	0	3	0	0	3	0	0	0	0	0
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
2991	Miscellaneous/ General Sessions Offense repealed and not	4	0	0	0	0	3	0	0	3	0	0	1	0	1
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%	0.0%		0.0%	
2521	Miscellaneous/Criminal offenses	54	3	1	4	0	48	0	0	48	2	0	0	0	2
						0.0%		0.0%	0.0%			0.0%	0.0%	0.0%	
2520	Miscellaneous/Traffic offenses	6	0	0	0	0	5	0	0	5	1	0	0	0	1
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%			0.0%	0.0%	0.0%	
819	Misconduct/Malfeasance, etc in office	44	16	0	16	0	28	0	0	28	0	0	0	0	0
				0.0%		0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
781	Misprision/Felony (neg in report crime)	35	10	0	10	0	21	0	0	21	1	2	1	0	4
				0.0%		0.0%		0.0%	0.0%					0.0%	
2139	Motorcycle/Fail to use headlight	1	0	0	0	0	1	0	0	1	0	0	0	0	0
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
9004	Municipal/Open	12	0	0	0	0	9	0	0	9	2	0	1	0	3
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%			0.0%		0.0%	
9000	Municipal/Viol of City Ordinance	28	2	0	2	0	21	0	0	21	1	0	4	0	5
				0.0%		0.0%		0.0%	0.0%			0.0%		0.0%	
9001	Municipal/Viol of City Traf Ordin	1	0	0	0	0	1	0	0	1	0	0	0	0	0
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%

Exhibit A
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South Carolina Judicial Department

General Sessions Dispositions by all Offenses

For Period 7/1/2016 Thru 6/30/2017 - Run Date 8/14/2017 - Program-ID CRM115

Code	Offense	Disp During Period	Guily Plea	Trial Guilty	Total Convict	Trial Not Guilty	Pros Ended Nol Pros	JUD Commit	JUD Dism	Non Convict	Remand	Disp at Prelim/ No Bill	Fail To Appear	Other	Total Other
2991	Miscellaneous/ General Sessions Offense repealed and not	10	0	0	0	0	10	0	0	10	0	0	0	0	0
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
2521	Miscellaneous/Criminal offenses	67	2	0	2	0	50	0	0	50	13	1	1	0	15
				0.0%		0.0%		0.0%	0.0%					0.0%	
2520	Miscellaneous/Traffic offenses	7	1	0	1	0	6	0	0	6	0	0	0	0	0
				0.0%		0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
819	Misconduct/Malfeasance, etc in office	21	6	2	8	0	13	0	0	13	0	0	0	0	0
						0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
781	Misprision/Felony (neg in report crime)	32	13	0	13	0	16	0	0	16	0	1	2	0	3
				0.0%		0.0%		0.0%	0.0%		0.0%			0.0%	
9003	Municipal/Open	3	1	0	1	0	2	0	0	2	0	0	0	0	0
				0.0%		0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
9004	Municipal/Open	12	1	0	1	0	11	0	0	11	0	0	0	0	0
				0.0%		0.0%		0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
9007	Municipal/Open	1	1	0	1	0	0	0	0	0	0	0	0	0	0
				0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9000	Municipal/Viol of City Ordinance	44	4	0	4	0	35	0	0	35	5	0	0	0	5
				0.0%		0.0%		0.0%	0.0%			0.0%	0.0%	0.0%	
9001	Municipal/Viol of City Traf Ordin	3	0	0	0	0	1	0	0	1	2	0	0	0	2
			0.0%	0.0%	0.0%	0.0%		0.0%	0.0%			0.0%	0.0%	0.0%	
3410	Murder / Attempted Murder	1,631	600	25	625	35	893	0	10	928	10	43	15	0	68
								0.0%						0.0%	
2356	Murder/Homicide by child abuse	20	6	3	9	2	9	0	0	11	0	0	0	0	0
								0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
2357	Murder/Homicide-Child abuse, aid & abet	4	3	1	4	0	0	0	0	0	0	0	0	0	0
						0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
116	Murder/Murder	356	188	50	238	11	96	0	6	107	0	2	1	2	5
								0.0%			0.0%				
2656	Neglect/Neglect of vulnerable adult	18	6	0	6	0	11	0	0	11	0	0	1	0	1
				0.0%		0.0%		0.0%	0.0%		0.0%	0.0%		0.0%	