

Statement of  
Eric E. Sterling  
In Support of  
S. 79, the EQUAL Act  
Before the United States Senate Committee on the Judiciary  
June 22, 2021

SUMMARY

- From 1981 to 1989, I was an assistant counsel to the House Crime Subcommittee under Chair William J. Hughes (D-NJ). I was the principal House staffer who developed the mandatory minimum sentencing provisions in the Anti-Drug Abuse Act of 1986.
- The Anti-Drug Abuse Act of 1986 amended the Controlled Substances Act of 1970 to create new, very long sentences intended to be used against the highest-level drug traffickers. These sentences were enacted to “direct” the Department of Justice to focus on the highest-level traffickers.
- Congress made a serious mistake in defining high-level drug traffickers by using very low quantities of drugs to trigger mandatory minimums, especially for crack cocaine. I was directly involved in that mistake.
- Most drug experts know that most crack cocaine traffickers are low-level traffickers and can be readily and appropriately prosecuted by state and local law enforcement agencies and prosecutors and sentenced to state prisons.
- Truly high-level traffickers, frequently based in Mexico, Colombia and other nations can only be investigated and prosecuted by the federal government. Their ability to launder their enormous profits can only be investigated effectively by the federal government.
- Between FY 1992 and FY2020, the Department of Justice through the U.S. Attorneys Offices convicted at least 113,414 persons of crack distribution. They were overwhelmingly low-level offenders. This has been a scandalously wasteful opportunity cost limiting the prosecution of high-level offenders.
- Those low-level drug traffickers have generally been at least 80 percent Black. This is an excellent example of how institutional racism operates and continues despite the efforts of well-intentioned people in the Administration and Congress.

\* S. 79 would properly begin to redirect federal prosecutorial and investigative resources toward higher level and more important cocaine traffickers by changing the signal to the Department of Justice regarding drug quantities.

\* S. 79 would provide for those offenders illegally distributing crack cocaine at the street level to be sentenced more appropriately to reflect both their actual culpability and their culpability compared to other drug traffickers, by eliminating mandatory sentences for quantities of less than 500 grams.

\* S. 79 would offer some hope to prisoners now serving sentences decades longer than are just by providing an opportunity to be resentenced more appropriately.

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Chair Durbin, Ranking Member Grassley, Honorable Senators, thank you very much for giving the Law Enforcement Action Partnership (LEAP) the opportunity to testify in complete and enthusiastic support of S. 79, the EQUAL Act.

From 1981 to 1989, I was an assistant counsel to the House Crime Subcommittee under Chair William J. Hughes (D-NJ) responsible for drugs, organized crime, money laundering, firearms regulation, pornography, and other issues. Relevant to the consideration of S. 79, I was the principal House staffer involved in developing the mandatory minimum sentencing provisions enacted in the Anti-Drug Abuse Act of 1986.

S. 79 makes three important corrections to the most notorious problem of the Anti-Drug Abuse Act of 1986 -- excessively long sentences for low-level drug offenders, and especially the unwarranted disparity between crack cocaine and powder cocaine sentences.

First, S. 79 would properly redirect the prosecutorial and investigative resources of the Department of Justice toward higher level and more important cocaine traffickers and away from lowest-level level dealers and their couriers, lookouts, touts, etc., specifically those who distribute crack cocaine on the street.

Second, S. 79 would provide sentences for those persons distributing crack cocaine at the street level that are somewhat more appropriate to their actual culpability and their culpability relative to much more significant drug traffickers by eliminating mandatory sentences for quantities of less than 500 grams.

Third, S. 79 would provide an avenue to justice for those who are serving sentences that are excessive because they are not the high-level drug traffickers for whom Congress intended these long sentences.

In addition, by reducing the frequency with which U.S. District Judges would have to impose sentences which judges believe to be "manifestly unjust,"<sup>1</sup> (for example, for street-level

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<sup>1</sup> See, for example, the Resolution of the **Mississippi federal judges**, May 6, 1991 ("mandatory minimum sentences...apply regardless of the defendant's role in the offense and of other factors historically found relevant to sentencings. As a result, they also often require the imposition of sentences which are *manifestly unjust*." (emphasis added); the Resolution of the **Louisiana federal judges**, May 6, 1991 ("mandatory minimum sentences...apply regardless of the defendant's role in the offense and of other factors historically found relevant to sentencings. As a result, they also often require the imposition of sentences which are *manifestly unjust*." (emphasis added); the Resolution of the **Texas federal judges**, May 6, 1991 ("mandatory minimum sentences...apply regardless of the defendant's role in the offense and of other factors historically found relevant to sentencings. As a result, they also often require the imposition of sentences which are *manifestly unjust*." (emphasis added).

crack sellers), S. 79 might expand the pool of conscientious attorneys willing to serve on the Federal bench. Many senior judges, who have the discretion to decline certain cases, declared that they would not take cases involving mandatory minimum drug sentences.<sup>2</sup> It can be inferred many outstanding attorneys are not willing to serve as federal judges with the responsibility to impose sentences that offend their conscience. Thus, S. 79 could increase the ability of U.S. Senators to assist the President in the recruitment and identification of qualified candidates to be nominated to serve in the federal courts.

#### Background of Anti-Drug Abuse Act of 1986

The current long maximum sentences and mandatory minimums -- enacted in Subtitle A of Title I of the Anti-Drug Abuse Act (P.L. 99-570), the "Narcotics Penalties and Enforcement Act of 1986" -- were originally developed by the House Crime Subcommittee and reported by the House Judiciary Committee as H.R. 5394 (99th Cong. 2d Sess.; House Report 99-845, Part 1). I was the staffer who developed these provisions.

The 1986 provisions "substantially increase[d] the penalties in the Controlled Substances Act and the Controlled Substances Import and Export Act,"<sup>3</sup> by lengthening the maximum penalties for distributing certain drugs for more than certain quantities from 15 years (as enacted in 1970) to 40 years, or to life imprisonment, and by creating minimum terms of imprisonment for five years and ten years.

Why were these long sentences created? **"One of the major goals of [the Narcotics Penalties and Enforcement Act] is to give greater direction to the DEA and the U.S. Attorneys on how to focus scarce law enforcement resources...The [House Judiciary] Committee strongly believes that the Federal government's most intense focus ought to be on major traffickers, the manufacturers or heads of organizations, who are responsible for creating and delivering very large quantities of drugs."**<sup>4</sup>

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(emphasis added); the Resolution of the United States **District Judges of the Fifth Circuit**, May 6, 1991 ("mandatory minimum sentences...apply regardless of the defendant's role in the offense and of other factors historically found relevant to sentencings. As a result, they also often require the imposition of sentences which are *manifestly unjust*." (emphasis added); Resolution No. 6 of the **Ninth Circuit Chief District Judges** (finding that mandatory minimum statutes "forc[e] the courts in many instances to impose sentences which are *manifestly unjust* and harsh" (emphasis added) undated); Resolution -- Mandatory Minimum Criminal Sentences, by the **Judicial Council of the District of Columbia Circuit** ("these statutory provisions leave no discretion with the trial courts, forcing courts in many instances to impose very long sentences, not subject to parole, which are *manifestly unjust*" (emphasis added) adopted at its March 1990 meeting). Resolutions reprinted in Appendix G of United States Sentencing Commission, *Special Report to the Congress: Mandatory Minimum Penalties in the Federal Criminal Justice System*, August 1991.

<sup>2</sup> Sandra Torrey, "Some Federal Judges Just Say No to Drug Cases," *The Washington Post*, (May 17, 1993), <https://www.washingtonpost.com/archive/business/1993/05/17/some-federal-judges-just-say-no-to-drug-cases/b0fbc5e5-111c-44cb-9014-d25a47bb67d5/> (Accessed June 21, 2021).

<sup>3</sup> H.Rept. 99-845, Part 1, Report of the Committee on the Judiciary to accompany H.R. 5394, Narcotics Penalties and Enforcement Act of 1986, at p. 10. (Other subtitles of Title I of the Anti-Drug Abuse Act of 1986, P.L. 99-570 -- Subtitles B, C, F, G, Q, and R -- also were also originally developed in H.R. 5394 and reported by the House Committee on the Judiciary.)

<sup>4</sup> *Ibid.* at pp.11-12 (emphasis added).

Congress in 1986 was quite correct when assessing the proper role of the Drug Enforcement Administration and the Department of Justice in the national project to protect the people and cities of the United States from cocaine and its related problems. If we are going to rely on drug enforcement, **the federal role must be targeted to investigate and prosecute the highest-level traffickers.** The state and local governments have no capacity to operate overseas, in neighboring nations, or even in other states. It is high-level traffickers and organizations that manage and direct the production of cocaine in South America, arrange the large-scale shipment of cocaine to the United States through Mexico and other nations, and mastermind the interstate distribution of cocaine to markets. If the federal government spends its resources investigating, prosecuting, and imprisoning lower-level drug traffickers that the states are fully capable of prosecuting, this extraordinary opportunity cost prevents focus on the proper targets. According to the DEA *2020 National Drug Threat Assessment*, the high-level cocaine traffickers are typically Mexican and Colombian “transnational criminal organizations” (TCOs) that “**obtain multi-ton shipments of powder cocaine.**”<sup>5</sup> The scale of the high-level management of the distribution of cocaine can be appreciated by noting that Customs and Border Protection alone seized over 55 metric tons of cocaine in 2019.<sup>6</sup>

Congress, however, failed profoundly in 1986 in determining what “very large quantities” of drugs indicate high level traffickers. Most notoriously, Congress set 5 grams and 50 grams of crack cocaine as the “very large quantities” that triggered mandatory sentences of five years and ten years for the distribution of cocaine in that form. I deeply regret that I am partly responsible for this failure. I have explained over the years how the Subcommittee stumbled from focusing on the highest-level traffickers, as determined by DEA -- as I originally suggested -- and adopted the terribly small trigger quantities that passed the House and were amended in the Senate in its consideration of the Anti-Drug Abuse Act of 1986. In part, the Crime Subcommittee relied upon the recommendations on the crack cocaine trigger quantities that I forwarded from a street narcotics officer of Washington, D.C.’s Metropolitan Police Department then on detail to the House Select Committee on Narcotics Abuse and Control for guidance (an officer later convicted of perjury and contempt of court).<sup>7</sup>

Fixing this problem was a goal of then-Senator Joseph Biden in introducing the “Drug Sentencing Reform and Cocaine Kingpin Trafficking Act of 2007.”<sup>8</sup>

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<sup>5</sup> DEA, March 2021, *2020 National Drug Threat Assessment*, DEA-DCT-DIR-008-21, <https://www.dea.gov/documents/2021/03/02/2020-national-drug-threat-assessment>, at 33.

<sup>6</sup> *Ibid.*

<sup>7</sup> Fraser, Kirk (24 June 2009) producer of the documentary movie, “Without Bias,” part of the ESPN series, *30 for 30*, statement occurs at 44:34; NPR (June 20, 2011), “How An Athlete’s Death Led to Shoddy Drug Laws,” *Talk of the Nation*, <https://www.npr.org/transcripts/137302172> (accessed June 18, 2021).

<sup>8</sup> Sec. 3. Cocaine Sentencing Disparity Elimination, S. 1711, (110th Cong. 1st Sess.), “Drug Sentencing Reform and Cocaine Kingpin Trafficking Act of 2007,” June 27, 2007, later co-sponsored by Senators Obama and Clinton. A companion bill, H.R. 4545, was introduced in the House of Representatives on Dec. 13, 2007 by Ms. Jackson-Lee and 21 co-sponsors. I was the creator of this legislation, originally called the “Cocaine Kingpin Punishment Act,” for the Justice Roundtable.

### Implications of Congress getting the trigger quantities wrong

How do the trigger quantities in the law relate to the actual workings of the international and nationwide narcotics traffic? Consider that one metric ton is one million grams. The 55 metric tons CBP seized in 2019 is 55,000,000 grams of cocaine. In July 2019, CBP seized 20 tons of cocaine (20,000,000 grams) on one ship in Philadelphia worth an estimated \$1.3 billion.<sup>9</sup> Less than two weeks ago on June 9, U.S. Customs and Border Protection seized on a vessel in the waters of Puerto Rico 589.4 kilograms of cocaine<sup>10</sup> -- 589,400 grams. An individual who sells 5 grams or 50 grams (or since enactment of the Fair Sentencing Act of 2010, 28 grams or 280 grams) of crack cocaine cannot be characterized as a “major” or “high-level” trafficker in any meaningful sense of the terms. Indeed, even the 500-gram and 5000-gram triggers for powder cocaine are much smaller than appropriate for the purpose.

### Department of Justice misfocus on low-level crack cocaine defendants

The United States Sentencing Commission (USSC) has studied the role of cocaine offenders prosecuted by the Justice Department. In its May 2007 report to Congress, it analyzed the most serious function of a sample of 2005 cocaine offenders in carrying out their criminal conduct according to their presentence reports. The range of eight functions was on a scale from most serious -- “Importer/High-Level Supplier” to least serious -- “Renter/Loader/Lookout/Enabler/User/All Others.” Of the crack cocaine offenders, 61.1 percent were street-level dealers, couriers, renters, loaders, lookouts, etc. Only 8.4 percent were high-level suppliers, organizers, leaders, manufacturers, financiers, or money launderers. Only 2.0 percent were managers or supervisors. 22.7 percent were wholesalers. 5.4 percent were bodyguards, cooks, steerers, brokers, pilots, captains, or chemists.<sup>11</sup> In other words, the **overwhelming majority** of the federal crack cocaine defendants studied were low-level offenders, precisely the defendants that Congress did not intend to be subject to the high sentences enacted in 1986. This shocking focus on low-level offenders **was actually an improvement** over a USSC study of FY2000 cocaine offenders. In that study, **72.7 percent of the crack defendants were street-level dealers**, etc. Only 6.1 percent were the high-level suppliers, etc., and only 9.1 percent were wholesalers.<sup>12</sup>

The geographical scope of a drug trafficker is also a measure of whether an offender is the appropriate target for a federal investigation and the long federal sentences imposed in such prosecutions. The USSC also studied this for the 2005 sample of offenders using a six-point scale ranging from Neighborhood, Local, Regional, Section of Country, National, or

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<sup>9</sup> FoxNews, “Seized ship with \$1.3B in cocaine aboard reportedly owned by JPMorgan Chase,” July 11, 2019, <https://www.foxnews.com/us/philadelphia-cbp-agents-seize-ship-owned-by-jpmorgan-chase-after-1-3-billion-20-tons-of-cocaine-found-on-board> (accessed June 19, 2021)

<sup>10</sup> U.S. Customs and Border Protection Press Release, “AMO Seizes Cocaine Haul Worth \$17.6M Concealed inside Vessel Near Vieques, Puerto Rico,” June 15, 2021, <https://www.cbp.gov/newsroom/local-media-release/amo-seizes-cocaine-haul-worth-176m-concealed-inside-vessel-near-vieques> (AMO means Air and Marine Operations; accessed June 20, 2021).

<sup>11</sup> U.S. Sentencing Commission, “Report to Congress: Cocaine and Federal Sentencing Policy,” (May 2007) Figure 2-4, Most Serious Function for Powder Cocaine and Crack Cocaine Offenders, p. 19. [https://www.ussc.gov/sites/default/files/pdf/news/congressional-testimony-and-reports/drug-topics/200705\\_RtC\\_Cocaine\\_Sentencing\\_Policy.pdf](https://www.ussc.gov/sites/default/files/pdf/news/congressional-testimony-and-reports/drug-topics/200705_RtC_Cocaine_Sentencing_Policy.pdf) (Accessed June 20, 2021).

<sup>12</sup> Ibid. Figure 2-6 Most Serious Function for Crack Cocaine Offenders, p. 21.

International. For the crack cocaine offenders, 56.6 percent operated in a neighborhood, 19.9 percent operated locally, 13.3 percent operated in a region, 4.2 percent operated in a section of the country, 5.1 percent operated nationally, and 0.9 percent operated internationally. Comparably, 42.0 percent of the powder cocaine defendants operated internationally, 18.2 percent operated nationally, and 4.9 percent operated in a section of the country.<sup>13</sup> Once again, the evidence presented to Congress in 2007 was of wholesale misfocus by the Department of Justice when it was prosecuting 5,275 crack cases in FY2005, 5,619 crack cases in FY2006, 5,472 cases in FY2007, and 6,154 crack cases in FY2008.<sup>14</sup>

There were even earlier signs that most of the crack cocaine cases should not be federal prosecutions. In 1995, the USSC looked at the dollar value of the quantities of drugs defendants trafficked who were determined to be sentenced at various USSC Guideline Levels. For those determined to be at Level 26 (about 5 years, a mandatory minimum level), the dollar value was estimated at \$838,000 for marijuana, \$100,000 for heroin, \$53,500 for powder cocaine, \$9,500 for methamphetamine, and **\$575 for crack cocaine**. It is inconceivable that a trafficker in \$575 worth of drugs would be prosecuted and punished as a major or high-level trafficker.<sup>15</sup> In 1995, the USSC studied the culpability and roles of drug defendants and whether they operated locally, intrastate, interstate or internationally. Significantly, only 1.3 percent of crack defendants in the 1992 sample operated internationally, and only 14.6 percent operated interstate. By contrast, 76.8 percent operated only locally.<sup>16</sup> Not only were they operating locally, nearly two-thirds were the lowest level offenders, street-level dealers and couriers -- 63.7 percent of crack defendants.<sup>17</sup>

Nevertheless, for decades, the Department of Justice operating through United States Attorneys, disregarded the intent of Congress and has disproportionately focused on low level offenders in cases involving crack cocaine.

#### Wholesale unwarranted racial disparity in the prosecution of crack offenders

Even though it has been clear since the early 1990s that these low-level offenders have been disproportionately Black, the focus on Black low-level crack offenders has continued without change.

In February 1995, the U.S. Sentencing Commission (USSC) submitted a special report to Congress on Cocaine and Federal Sentencing Policy,<sup>18</sup> the first of four. In FY 1993, one in five

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<sup>13</sup> Ibid. Figure 2-7 Geographic Scope of Powder Cocaine and Crack Cocaine Offenses, p. 22.

<sup>14</sup> United States Sentencing Commission, "Sourcebook on Federal Sentencing Statistics," FY 2005 through FY 2008, Table 34, and see Appendix, below.

<sup>15</sup> United States Sentencing Commission, "Special Report to Congress: Cocaine and Federal Sentencing Policy" (February 1995) [https://www.ussc.gov/sites/default/files/pdf/news/congressional-testimony-and-reports/drug-topics/199502-rtc-cocaine-sentencing-policy/1995-Crack-Report\\_Full.pdf](https://www.ussc.gov/sites/default/files/pdf/news/congressional-testimony-and-reports/drug-topics/199502-rtc-cocaine-sentencing-policy/1995-Crack-Report_Full.pdf) (accessed June 19, 2021). p. 173, Table 19.

<sup>16</sup> Ibid. p. 170, Table 17.

<sup>17</sup> Ibid. p. p. 171, Table 18.

<sup>18</sup> United States Sentencing Commission, "Special Report to Congress: Cocaine and Federal Sentencing Policy" (February 1995) [https://www.ussc.gov/sites/default/files/pdf/news/congressional-testimony-and-reports/drug-topics/199502-rtc-cocaine-sentencing-policy/1995-Crack-Report\\_Full.pdf](https://www.ussc.gov/sites/default/files/pdf/news/congressional-testimony-and-reports/drug-topics/199502-rtc-cocaine-sentencing-policy/1995-Crack-Report_Full.pdf) (accessed June 19, 2021).

federal drug prosecutions was for distributing crack cocaine (19.4%).<sup>19</sup> **Of those prosecuted for crack offenses in FY1993, 88.3 percent were Black, and Blacks were the largest demographic of all federal drug defendants, 33.9 percent.**<sup>20</sup>

Then, on May 21, 1995, the *Los Angeles Times* reported that **no white person had been prosecuted in federal court for crack cocaine offenses since the 1986 enactment in the federal courts in Los Angeles, Boston, Denver, Dallas, Miami or Boston, and in 17 states. In all the federal court crack cocaine prosecutions in the states of California, New York, Texas, and Pennsylvania, only eight White persons were ever prosecuted for crack cocaine.**<sup>21</sup> Even after this story, and widespread public concern, the racial disparity in the prosecution of the lowest-level, local drug dealers has continued unabated. Every year since 1992, the USSC reported in either its Annual Report or its Sourcebook of Federal Sentencing Statistics the racial disparity in crack cocaine prosecutions. Attached in the Appendix is my compilation of the race of all federal crack cocaine defendants from FY1992 through FY2020.<sup>22</sup> **In these 29 years, the percentage of Black persons convicted of crack cocaine offenses was greater than 80 percent for 23 years.**

According to the latest data in FY2020, Blacks were 76.8% of federal crack convictions and Whites were only 6.3% of federal crack convictions.<sup>23</sup>

At a moment when the United States is confronting institutional, structural, and historical racism, it must be acknowledged that the crack cocaine mandatory minimums of 1986 -- as implemented -- exemplify such aspects of racism. Congress did not intend to punish Black persons, Latinx persons, or the communities in which they live in enacting this law. However, as implemented by the Justice Department, the crack cocaine mandatory minimums have been used disproportionately and inappropriately against Black defendants.

#### The failure to appreciate the role of State and Local law enforcement

Congress should appreciate that highly capable and resourced state and local law enforcement and criminal justice agencies constitute the overwhelmingly largest part of the nation's drug enforcement effort in terms of personnel and expenditure. Every state has statewide narcotics enforcement investigators, and every major city and county, and most medium size cities and counties also have bureaus of narcotics investigators and prosecutors. Almost every state provides for the harsh punishment of narcotics traffickers. These state and local agencies all carry out narcotics investigations involving wiretaps pursuant to law, conduct undercover investigations, and use informants. There are tens of thousands state and local prosecutors and state court judges and the states have a collective capacity to imprison over 1 million persons. The states have the capacity to fully investigate, prosecute, and punish the

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<sup>19</sup> Ibid. p. 150.

<sup>20</sup> Ibid. p. 156.

<sup>21</sup> Dan Weikel, May 21, 1995, *Los Angeles Times*, "War on Crack Targets Minorities over Whites: Cocaine: Records show federal officials almost solely prosecute nonwhites. U.S. Attorney denies race is a factor." <https://www.latimes.com/archives/la-xpm-1995-05-21-mn-4468-story.html> (Accessed June 18, 2021)

<sup>22</sup> The data in the Appendix is taken from the USSC annual reports and Sourcebook of Federal Sentencing Statistics for each of the years, 1992 - 2020.

<sup>23</sup> U.S. Sentencing Commission, 2021, *2020 Sourcebook of Federal Sentencing Statistics*, table D-2.

largest local drug dealers. Most of the retail distribution is done by local organizations. As made clear in the *2020 National Drug Threat Assessment*, “... **the production and distribution of crack cocaine is mainly handled by local criminal groups and street gangs.**”<sup>24</sup> If the triggering threshold for crack cocaine for federal mandatory minimums is set at 500 grams and 5000 grams, the state authorities will still have the drug enforcement and punishment capacity to address crack dealers operating at levels below the thresholds.

Providing the opportunity to address injustice.

Providing for men and women who are currently serving sentences for trafficking in crack cocaine the opportunity for review of those sentences could provide a long overdue measure of justice for them. Significantly, these long maximum sentences were enacted in 1986 before the possibility of parole was removed from the Federal system with the adoption on November 1, 1987, of the sentencing guidelines promulgated by the U.S. Sentencing Commission pursuant to the Sentencing Reform Act of 1984. Many Members of Congress did not appreciate in 1986 that the non-mandatory portion of the sentences that were being authorized would soon no longer be subject to parole. This bill would provide an important measure of justice -- racial and otherwise -- to tens of thousands of men and women.

Impact on nominees for U.S. District Court

There is an additional benefit from mandatory minimum reform legislation such as S. 79 of interest to the Senate Judiciary Committee regarding its role to provide “advice and consent” to the President in the nomination of Federal District Judges. Some men and women who are highly qualified to serve as U.S. District Judges can be presumed to decline to be considered for reasons of conscience because they would have to routinely impose sentences recognized as “manifestly unjust.” Enacting S. 79 may enable you, as Senators involved in recommending potential judicial candidates to the President, to have a larger pool of qualified candidates of strong faith and conscience to draw from.

I urge the favorable report of S. 79.

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<sup>24</sup> *2020 National Drug Threat Assessment* at 33.

<b>Appendix</b>	Crack Cocaine Cases					USSC Annual Report or Sourcebook after 1996
FY Year	No. Cases	% White	% Black	% Hispanic	% Other	Source
92	2070	3.0	91.5	5.3	0.2	Table 31
93	3440	4.4	87.9	7.2	0.5	Table 62
94	3598	3.5	90.4	5.9	0.3	Table 57
95	3766	4.5	88.4	6.5	0.6	Table 38
96	4603	4.8	85.8	8.7	0.7	Table 34
97	4624	6.4	84.4	8.6	0.6	"
98	4890	5.7	84.8	8.7	0.7	"
99	5187	5.4	84.7	8.9	1.1	"
2000	5012	5.2	84.2	9.0	1.1	"
01	4999	7.0	82.8	9.3	0.9	"
02	5166	7.0	81.4	10.5	1.1	"
03	5458	7.8	80.8	10.4	1.0	"
04 Pre- <i>Blakley</i>	3698	6.8	83.1	9.2	0.9	"
04 Post- <i>Blakley</i>	1230	9.8	80.3	9.3	0.6	"
05 Pre- <i>Blakley</i>	1204	7.8	83.2	6.6	2.4	"
05 Post- <i>Blakley</i>	4071	8.2	82.3	8.0	1.4	"
06	5619	9.3	81.0	8.6	1.1	"
07	5472	8.8	82.7	7.9	0.6	"
08	6154	10.4	79.8	8.8	1.0	"
09	5669	9.8	79.0	10.3	0.9	"
10	4887	7.3	78.5	13.1	1.1	"
11	4353	6.1	83.0	10.0	0.9	"
12	3505	6.7	82.6	9.7	1.0	"
13	2972	5.8	82.7	10.2	1.2	"
14	2431	6.7	82.9	9.0	1.4	"
15	1957	6.0	79.9	13.5	0.7	"
16	1580	5.5	82.6	11.4	0.5	"
17	1610	4.8	79.7	14.8	0.7	"
18	1416	6.3	80.0	13.0	0.7	Table D-2
19	1560	5.3	81.1	12.6	1.0	Table D-2
20	1213	6.3	76.8	16.2	0.7	Table D-2
Total Cases 1992-2020	113,414					