

# Environmental Hearings January 2020

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## What We Will Cover

- What is an Environmental Hearing?
  - What is a Public Nuisance?
  - Required Notice to Offender
  - Hearing
  - Order
  - Appeal
- Criminal Cases Involving a Public Nuisance
  - Chapter 343, Health and Safety Code (abatement of a public nuisance)
  - Chapter 341, Health and Safety Code (sanitation standards)
  - Chapter 7, Water Code (sewage disposal)

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## What is an Environmental Hearing?

- Certain actions or occurrences are considered **public nuisances**.
- A county may **abate** a public nuisance if it follows abatement procedures under Chapter 343 of the Health and Safety Code.
  - “Abate” means to eliminate or remedy the nuisance

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## What is an Environmental Hearing?

- But before a county may abate a nuisance, it has to provide a hearing if one is requested.
  - This is where you come in!
- A justice of the peace is one of the officers who might be able to preside over such a hearing!

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## What is an Environmental Hearing?

- The role of the court in this hearing is to:
  - Determine whether a nuisance has occurred;
  - Determine whether the county has authority to abate the nuisance; and
  - If so, assess costs and fees in favor of the county.
- The court may **not** order injunctive relief in this proceeding!
  - The court just makes findings and assesses costs and fees.

-- Health and Safety Code §§ 343.021(a), 343.022, 343.023

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## What is a Public Nuisance?

- Chapter 343 of the Health and Safety Code lists all the public nuisances that can be abated by a county.
- Here are examples:
  - Refuse on premises;
  - Rubbish, tires, refrigerators, stoves, furniture on premises;
  - Unsanitary conditions;

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## What is a Public Nuisance?

- Examples:
  - Unsafe or dilapidated building;
  - Unenclosed swimming pool;
  - Flea market that is a fire hazard;
  - Discarding refuse;
  - Blocking a drainage easement;
  - Surface discharge from an on-site sewage disposal system (septic tank).
    - Health and Safety Code § 343.002

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## What is a Public Nuisance?

- See Handout 1 for Complete List of Public Nuisances and Legal Definitions
- This list only applies to **unincorporated** areas of a county.
- Also does not apply to:
  - Site or Facility permitted by a state agency;
  - Solid waste facility licensed under Chapter 361 (the Solid Waste Disposal Act, which regulates hazardous waste, industrial waste, medical waste, etc.); or
  - Agricultural land.
    - Health and Safety Code § 343.011(a), (d)

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## Some Examples



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## Some Examples



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## Some Examples



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## Some Examples



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## Some Examples



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## Some Examples



 alamy stock photo

BRXN39  
www.alamy.com

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## “Flintstones House”



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## Notice to the Offender

- Written notice of the public nuisance must be given to:
    - The owner, lessee, occupant, agent or person in charge of the premises; and
    - The person responsible for causing a public nuisance on the premises when:
      - That person is not the owner, lessee, occupant, agent or person in charge of the premises; and
      - The person responsible can be identified.
- Health and Safety Code § 343.022(b)

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## Contents of the Notice

- The notice must state:
  - the specific condition that constitutes a nuisance;
  - that the person receiving the notice shall abate the nuisance before the:
    - 31st day after the date on which the notice is served, if the person has not previously received a notice; or
    - 10th business day after the date on which the notice is served, if the person has previously received a notice concerning a nuisance on the premises;

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## Contents of the Notice

- The notice must state:
  - that failure to abate the nuisance may result in:
    - abatement by the county;
    - assessment of costs to the person responsible for causing the nuisance when that person can be identified; and
    - a lien against the property on which the nuisance exists, if the person responsible for causing the nuisance has an interest in the property;

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## Contents of the Notice

- The notice must state:
  - that the county may prohibit or control access to the premises to prevent a continued or future nuisance for certain nuisances, such as refuse on premises or an unenclosed swimming pool (see items 1, 6, 9, and 10 on Handout 1); and

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## Contents of the Notice

- The notice must state:
  - that the person receiving notice is entitled to submit a written request for a hearing before the:
    - 31st day after the date on which the notice is served, if the person has not previously received a notice; or
    - 10th business day after the date on which the notice is served, if the person has previously received a notice regarding a nuisance on the premises.

-- Health and Safety Code § 343.022

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## Method of Service

- The notice must be served:
  - In person or by registered or certified mail, return receipt requested; or
  - If personal service cannot be obtained or the address of the person to be notified is unknown, then by:
    - posting a copy of the notice on the premises where the nuisance exists; and
    - publishing the notice in a newspaper with general circulation in the county two times within 10 consecutive days.
- Notice is normally provided by a county environmental health official or other county employee who deals with public nuisances.
  - Health and Safety Code § 343.022(d)

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## Filing Fee

- No Filing Fee!
  - No authority to charge a filing fee at any stage of the proceedings
  - Offender is entitled to a hearing upon request, if timely

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## Hearing

- Hearing Before Abatement
    - A county must generally provide a hearing, if requested, **before** it abates a nuisance.
    - Exception: If the nuisance is maintaining a swimming pool on abandoned or unoccupied property without a proper fence or cover, a county may abate first, then hold a hearing, by:
      - Prohibiting or controlling access to the premises; and
      - Installing a cover that cannot be opened by a child over the entire swimming pool.
- Health and Safety Code § 343.022(e), (f)

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## Hearing

- Who Hears the Case?
    - Hearings may be conducted before:
      - The Commissioners Court; or
      - Any board, commission or official designated by the Commissioners Court.
        - This includes a Justice of the Peace if designated
        - But a Justice of the Peace may **not** conduct the hearing if they have not been designated to do so by the Commissioners Court!
- Health and Safety Code § 343.022(e)

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## Hearing

- What is the Issue to be Decided at the Hearing?
  - The Justice of the Peace (or other official designated to conduct the hearing) must determine:
    - Whether a public nuisance exists; and if so
    - Whether the county has the authority to abate the nuisance.
      - This means: has the county adopted procedures consistent with Chapter 343 of the Health and Safety Code and followed the required procedures, including providing notice to the offender and an opportunity for a hearing.
        - Health and Safety Code § 343.023(b), (e)

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## Order

- If a justice court is designated to conduct the hearing, and finds that a public nuisance exists and the county has authority to abate the nuisance, the court may assess:
  - The cost of abating the nuisance, including management, remediation, storage, transportation and disposal costs, and damages and other expenses incurred by the county;

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## Order

- The cost of legal notification by publication; and
- An administrative fee of not more than \$100 on the person receiving the notice.
  - Health and Safety Code § 343.023(a)

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## Appeal

- There is no procedure for an appeal.
- See Handout 2: Environmental Hearings Flowchart

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## Criminal Cases Involving a Public Nuisance

- May a criminal case be brought in justice court over a public nuisance?
- Yes!
- **But** only if the penalty for the offense is a fine and not jail time.

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## Criminal Cases Involving a Public Nuisance

- Let's look at possible criminal cases filed under three public nuisance statutes:
  - Chapter 343 of the Health & Safety Code (abatement of a public nuisance)
  - Chapter 341 of the Health and Safety Code (sanitation standards)
  - Sections 7.173, 7.1735 and 7.174 of the Water Code (violations relating to sewage disposal)

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## Criminal Cases Involving a Public Nuisance

- These enforcement mechanisms are also referenced in 30 Texas Administrative Code Section 285.71: enforcement of on-site sewage facility regulations by bringing a criminal or civil enforcement action under Chapters 343 or 341, Health and Safety Code, or Chapter 7 of the Texas Water Code.

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## Criminal Cases Involving a Public Nuisance: Chapter 343

- Section 343.011(b): “A person may not cause, permit, or allow a public nuisance under this section.”
  - Remember: “Public nuisance” is defined on Handout 1.
- Section 343.012(a): “A person commits an offense if:
  - (1) the person violates Section 343.011(b); and
  - (2) the nuisance remains unabated after the 30<sup>th</sup> day after the date the person receives notice from a county official, agent, or employee to abate the nuisance.”

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## Criminal Cases Involving a Public Nuisance: Chapter 343

- Section 343.012(b): “An offense under this section is a misdemeanor punishable by a fine of **not less than \$50 or more than \$200.**”
  - Section 343.012(d): “Each day a violation occurs is a separate offense.”
- So if a defendant is convicted, the court may impose a separate fine for each day a violation occurred, i.e. each day the defendant failed to abate the nuisance.

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## Criminal Cases Involving a Public Nuisance: Chapter 343

- Section 343.012(c): If it is shown at trial that the defendant has previously been convicted of an offense under this section, then punishment may include up to six months in jail.
  - In that case a justice court would not have jurisdiction to hear the case and the court would have to dismiss the case which could be heard by a county or district court.

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## Criminal Cases Involving a Public Nuisance: Chapter 343

- Section 343.012(e): If the defendant is convicted of an offense under this section, then the court shall order abatement of the nuisance.
- Does this mean that a justice court may issue an order to abate the nuisance?
  - Yes! This is specific authority to the court to do so.
  - In fact, the court **must order abatement** upon conviction of the defendant.

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## Criminal Cases Involving a Public Nuisance: Chapter 343

- How is a criminal case likely to arise?
- A person is causing a public nuisance as defined in Section 343.011(c) (see Handout 1).
  - For example, they are allowing surface discharge from a septic system.
- A county environmental health official orders them to abate the nuisance.
- The person could request a hearing; but instead they just ignore the order to abate.

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## Criminal Cases Involving a Public Nuisance: Chapter 343

- If the nuisance remains unabated 30 days after the person receives notice, then they have committed an offense under Section 343.012(b) and, if convicted, are subject to a fine of \$50 to \$200 for each day of the violation.
- And the court **shall** order abatement.
- The objective in these cases is really to get the person to clean up the nuisance rather than to assess monetary fines.
  - Could you grant a deferred disposition?

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## Criminal Cases Involving a Public Nuisance: Chapter 341

- Chapter 341 provides for minimum standards of sanitation and health protection measures.
  - Including drinking water and public restaurants.
- Section 341.011 has its own definition of “public health nuisance,” including
  - Breeding place for flies;
  - Unsanitary restaurant practices;
  - Sewage that could cause transmission of disease;
  - Overflowing septic tank.
- See Handout 3 for complete list.

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## Criminal Cases Involving a Public Nuisance: Chapter 341

- Section 341.012(a): “A person shall abate a public health nuisance existing in or on a place the person possesses as soon as the person knows that the nuisance exists.”
- Section 341.012(b) and (c): Local health authority shall issue a notice ordering a person to abate a nuisance and give a reasonable time to do so.

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## Criminal Cases Involving a Public Nuisance: Chapter 341

- Section 341.012(d): If the person does not abate the nuisance, a prosecuting attorney shall immediately institute proceedings to abate the nuisance or request the AG to do so.
- Note: This may be enforced in a suit seeking an injunction or a civil penalty but those cases can't be heard in justice court.  
-- Health and Safety Code § 341.092

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## Criminal Cases Involving a Public Nuisance: Chapter 341

- But a criminal case may also be brought in justice court under Section 341.091(a).
- It states: “A person commits an offense if the person violates this chapter or a rule adopted under this chapter. An offense under this section is a misdemeanor punishable by a fine of not less than \$10 or more than \$200.”
- Section 341.091(c): “Each day of a continuing violation is a separate offense.”

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## Criminal Cases Involving a Public Nuisance: Chapter 341

- This is similar to the procedure under Chapter 343 discussed above.
- A complaint is filed in justice court seeking a fine and court costs for violation of Section 341.091 because the defendant has failed to abate a public health nuisance as defined in Section 341.011.
- And a separate fine may be imposed for each day the violation continues.
- But the court is **not** authorized under this statute to order abatement of the nuisance upon conviction.

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## Criminal Cases Involving a Public Nuisance: Chapter 341

- Section 341.047 also makes it an offense to violate provisions of Chapter 341 dealing with safe drinking water (Subchapter C of Chapter 341).
- Section 341.047(b): An offense of this section is a **Class C** misdemeanor.

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## Criminal Cases Involving a Public Nuisance: Chapter 341

- Section 341.047(d): Each day of a continuing violation is a separate offense.
- Section 341.047(c): It's a Class B misdemeanor if the defendant was convicted of an offense within one year before the date on which the current offense occurred.

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## Criminal Cases Involving a Public Nuisance: Chapter 341

- So if a complaint is filed under Section 341.047 concerning safe drinking water under Subchapter C of Chapter 341, then the offense is a Class C misdemeanor (fine of \$1 to \$500) and Section 341.091 (fine of \$10 to \$200) does not apply.

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## Criminal Case Involving a Public Nuisance: Water Code Offenses

- Section 7.173 of the Water Code states:  
“Violation Relating to Sewage Disposal. (a) A person commits an offense if the person violates a rule adopted by the commission under Chapter 366, Health and Safety Code, or an order or resolution adopted by an authorized agent under Subchapter C, Chapter 366, Health and Safety Code.”
  - The commission is the Texas Natural Resources Conservation Commission.

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## Criminal Case Involving a Public Nuisance: Water Code Offenses

- An offense under Section 7.173(a) is a Class C misdemeanor.
  - But if it is shown at trial that the person has been previously convicted of an offense under that section, it is a jailable offense.
- So what is Chapter 366 of the Health and Safety Code? And Subchapter C of Chapter 366?

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## Criminal Case Involving a Public Nuisance: Water Code Offenses

- Chapter 366 regulates on-site sewage disposal systems (septic systems).
  - It authorizes the commission to adopt rules for the installation of on-site sewage disposal systems, and has authority over location, design, construction, installation and proper functioning of those systems.
- Subchapter C authorizes the commission to designate a local government entity as an authorized agent.

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## Criminal Case Involving a Public Nuisance: Water Code Offenses

- Section 7.173 of the Water Code allows a criminal case to be filed if a person violates a rule adopted under Chapter 366 of the Health and Safety Code.
  - Sections 7.1735 and 7.174 provide similar Class C misdemeanors for specific offenses under other parts of Chapter 366.
- So a criminal case may be filed under the Water Code for septic system offenses.
- But they do not make it a separate offense for each day a violation continues.

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## Criminal Cases Involving a Public Nuisance

- It is very important in any criminal case involving a public nuisance to look carefully at the complaint to see **which statute** the case is being brought under.
- As discussed above, a justice court does have jurisdiction to hear cases alleging a fine only offense under Chapters 343 and 341 of the Health and Safety Code, and under Sections 7.173, 7.1735 and 7.174 of the Water Code.

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## Criminal Cases Involving a Public Nuisance

- And the court must order abatement of the nuisance if a defendant is convicted of maintaining a public nuisance under Section 343.012 of the Health and Safety Code.

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## Criminal Cases Involving a Public Nuisance

- But other proceedings may also be brought under Chapter 366 when there is a public nuisance due to an on-site sewage disposal system that a justice court does not have jurisdiction to hear.
- Those proceedings include an enforcement action by TCEQ or a civil suit seeking injunctive relief and/or a civil penalty.
  - Health and Safety Code § 366.092 and 366.0922.

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## Criminal Cases Involving a Public Nuisance

- Bottom line: Justice Court may hear criminal cases seeking a fine for offenses under Chapters 343 or 341 of the Health and Safety Code or Sections 7.173, 7.1735 and 7.174 of the Water Code.
- A Justice Court must order abatement of a nuisance if a defendant is convicted under Section 343.012 (but not for a conviction under Chapter 341 or Chapter 7 of the Water Code).
- Justice Court may not hear civil penalty and injunction suits for an offense under Chapter 366 of the Health and Safety Code.

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## Criminal Cases Involving a Public Nuisance

- Look at the complaint to know which offense is being alleged!
- If the statute is not clearly identified in the complaint, require the prosecutor to amend the complaint so you know what your authority is (and the defendant knows what they are charged with).

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# Handout 1

## HANDOUT 1

### List of Public Nuisances:

1. Keeping, storing, or accumulating refuse on premises in a neighborhood unless the refuse is entirely contained in a closed receptacle;
2. Keeping, storing, or accumulating rubbish, including newspapers, abandoned vehicles, refrigerators, stoves, furniture, tires, and cans, on premises in a neighborhood or within 300 feet of a public street for 10 days or more, unless the rubbish or object is completely enclosed in a building or is not visible from a public street;
3. Maintaining premises in a manner that creates an unsanitary condition likely to attract or harbor mosquitoes, rodents, vermin, or disease-carrying pests;
4. Allowing weeds to grow on premises in a neighborhood if the weeds are located within 300 feet of another residence or commercial establishment;
5. Maintaining a building in a manner that is structurally unsafe or constitutes a hazard to safety, health, or public welfare because of inadequate maintenance, unsanitary conditions, dilapidation, obsolescence, disaster, damage, or abandonment or because it constitutes a fire hazard;
6. Maintaining on abandoned and unoccupied property in a neighborhood a swimming pool that is not protected with:
  - a fence that is at least four feet high and that has a latched and locked gate; and
  - a cover over the entire swimming pool that cannot be removed by a child;
7. Maintaining on any property in a neighborhood in a county with a population of more than 1.1 million a swimming pool that is not protected with:
  - a fence that is at least four feet high and that has a latched gate that cannot be opened by a child; or
  - a cover over the entire swimming pool that cannot be removed by a child;
8. Maintaining a flea market in a manner that constitutes a fire hazard;
9. Discarding refuse or creating a hazardous visual obstruction on:
  - county-owned land; or land or easements owned or held by a special district that has the commissioners court of the county as its governing body;
10. Discarding refuse on the smaller of:
  - the area that spans 20 feet on each side of a utility line; or
  - the actual span of the utility easement;
11. Filling or blocking a drainage easement, failing to maintain a drainage easement, maintaining a drainage easement in a manner that allows the easement to be clogged with debris, sediment, or vegetation, or violating an agreement with the county to improve or maintain a drainage easement;
12. Discarding refuse on property that is not authorized for that activity; or
13. Surface discharge from an on-site sewage disposal system as defined by Health and Safety Code § 366.002, Health and Safety Code § 343.011.

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# Handout 1

### Legal Definitions of Words Used in Above List of Public Nuisances:

"Building" means a structure built for the support, shelter, or enclosure of a person, animal, chattel, machine, equipment, or other moveable property.

"Garbage" means decayable waste from a public or private establishment or restaurant. The term includes vegetable, animal, and fish offal and animal and fish carcasses, but does not include sewage, body waste, or an industrial by-product.

"Neighborhood" means:

- a platted subdivision; or
- property contiguous to and within 300 feet of a platted subdivision.

"Platted subdivision" means a subdivision that has its approved or unapproved plat recorded with the county clerk of the county in which the subdivision is located.

"Premises" means all privately owned property, including vacant land or a building designed or used for residential, commercial, business, industrial, or religious purposes. The term includes a yard, ground, walk, driveway, fence, porch, steps, or other structure appurtenant to the property.

"Public street" means the entire width between property lines of a road, street, way, thoroughfare, or bridge if any part of the road, street, way, thoroughfare, or bridge is open to the public for vehicular or pedestrian traffic.

"Receptacle" means a container that is composed of durable material and designed to prevent the discharge of its contents and to make its contents inaccessible to animals, vermin, or other pests.

"Refuse" means garbage, rubbish, paper, and other decayable and nondecayable waste, including vegetable matter and animal and fish carcasses.

"Rubbish" means nondecayable waste from a public or private establishment or residence.

"Undeveloped land" means land in a natural, primitive state that lacks improvements, infrastructure, or utilities and that is located in an unincorporated area at least 5,000 feet outside the boundaries of a home-rule municipality.

"Weeds" means all rank and uncultivated vegetable growth or matter that:

- has grown to more than 36 inches in height; or
- creates an unsanitary condition likely to attract or harbor mosquitoes, rodents, vermin, or other disease-carrying pests, regardless of the height of the weeds.

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# Handout 1

"Flea market" means an outdoor or indoor market, conducted on non-residential premises, for selling secondhand articles or antiques, unless conducted by a religious, educational, fraternal, or charitable organization.

Health and Safety Code § 343.002

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# Handout 2

HANDOUT 2

## ENVIRONMENTAL HEARINGS FLOWCHART Chapter 343, Health & Safety Code

A full list of abatable nuisances found on ~~Handout 1~~ Separate from the below process, a criminal complaint may be filed under HSC 343.012. Procedure in those cases, is the same as in any criminal case. Fine of \$50-200 per day if the person hasn't abated within 30 days of the notice. If the defendant has a prior conviction, the offense is a jailable misdemeanor (no jurisdiction).

Written notice of the existence of a public nuisance must be given to:  
(1) the owner, lessee, occupant, agent, or person in charge of the premises; and  
(2) the person responsible for causing a public nuisance on the premises when that person is not the owner, lessee, occupant, agent, or person in charge of the premises and the person responsible can be identified.  
Notice is typically provided by a county environmental health official or another county employee employed to address public nuisances.

The notice must state:  
(1) the specific condition that constitutes a nuisance;  
(2) that the person receiving notice shall abate the nuisance before the:  
(A) 31st day after the date on which the notice is served, if the person has not previously received a notice regarding a nuisance on the premises; or  
(B) 10th business day after the date on which the notice is served, if the person has previously received a notice regarding a nuisance on the premises;  
(3) that failure to abate the nuisance may result in:  
(A) abatement by the county;  
(B) assessment of costs to the person responsible for causing the nuisance when that person can be identified; and  
(C) a lien against the property on which the nuisance exists, if the person responsible for causing the nuisance has an interest in the property;  
(4) that the county may prohibit or control access to the premises to prevent a continued or future nuisance described by Section 343.011(c)(1), (6), (9), or (10); and  
(5) that the person receiving notice is entitled to submit a written request for a hearing before the:  
(A) 31st day after the date on which the notice is served, if the person has not previously received a notice regarding a nuisance on the premises; or  
(B) 10th business day after the date on which the notice is served, if the person has previously received a notice regarding a nuisance on the premises.

The notice must be given:  
(1) by service in person or by registered or certified mail, return receipt requested; or  
(2) if personal service cannot be obtained or the address of the person to be notified is unknown, by posting a copy of the notice on the premises on which the nuisance exists and by publishing the notice in a newspaper with general circulation in the county two times within 10 consecutive days.

The court may assess, in an unappealable order:  
(1) the cost of abating the nuisance, including management, remediation, storage, transportation, and disposal costs, and damages and other expenses incurred by the county;  
(2) the cost of legal notification by publication; and  
(3) an administrative fee of not more than \$100 on the person receiving notice under Section 343.022.

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## Handout 3

### HANDOUT 3

Sec. 341.011. NUISANCE. Each of the following is a public health nuisance:

- (1) a condition or place that is a breeding place for flies and that is in a populous area;
- (2) spoiled or diseased meats intended for human consumption;
- (3) a restaurant, food market, bakery, other place of business, or vehicle in which food is prepared, packed, stored, transported, sold, or served to the public and that is not constantly maintained in a sanitary condition;
- (4) a place, condition, or building controlled or operated by a state or local government agency that is not maintained in a sanitary condition;
- (5) sewage, human excreta, wastewater, garbage, or other organic wastes deposited, stored, discharged, or exposed in such a way as to be a potential instrument or medium in disease transmission to a person or between persons;
- (6) a vehicle or container that is used to transport garbage, human excreta, or other organic material and that is defective and allows leakage or spilling of contents;
- (7) a collection of water in which mosquitoes are breeding in the limits of a municipality or a collection of water that is a breeding area for mosquitoes that can transmit diseases regardless of the collection's location other than a location or property where activities meeting the definition of Section 11.002(12)(A), Water Code, occur;
- (8) a condition that may be proven to injuriously affect the public health and that may directly or indirectly result from the operations of a bone boiling or fat rendering plant, tallow or soap works, or other similar establishment;
- (9) a place or condition harboring rats in a populous area;
- (10) the presence of ectoparasites, including bedbugs, lice, and mites, suspected to be disease carriers in a place in which sleeping accommodations are offered to the public;
- (11) the maintenance of an open surface privy or an overflowing septic tank so that the contents may be accessible to flies; and
- (12) an object, place, or condition that is a possible and probable medium of disease transmission to or between humans.

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## Resources

- Administrative Proceedings Deskbook, Chapter 7
- Health and Safety Code Chapters 343, 341 and 366
- Water Code Chapter 7
- Legal Board Questions
- For more information on a nuisance abatement suit we suggest reviewing the Attorney General's Nuisance Abatement Manual: [Nuisance Abatement: Civil Suits a Powerful Tool for Law Enforcement](#) [Nuisance Abatement Manual](#)

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**Thank You!**