



Metro

Los Angeles County
Metropolitan Transportation Authority

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TO: BOARD OF DIRECTORS

THROUGH: PHILLIP A. WASHINGTON *PAW*
CHIEF EXECUTIVE OFFICER

FROM: DANIEL G. LEVY *Daniel Levy*
CHIEF OFFICER, CIVIL RIGHTS PROGRAMS

ALEX Z. WIGGINS *AZW*
CHIEF, SYSTEM SECURITY AND LAW ENFORCEMENT

SUBJECT: TITLE VI COMPLAINT

ISSUE

In December 2016 Metro received notice from the Federal Department of Transportation (DOT) that a formal Title VI complaint against Metro and the Los Angeles County Sheriff's Department (LASD) had been filed with the DOT by the Labor Community Strategy Center. The complaint alleges, between 2012 and 2015, that Metro and the LASD fare checkers were discriminating on the basis of race by "demonstrating a pattern and practice of criminalization, stop and frisk fare enforcement and other quality of life citations and arrests on public transportation that systematically and egregiously target black riders", in violation of Title VI of the Civil Rights Act of 1964.

DISCUSSION

The complaint will be jointly reviewed by the DOT Office of Civil Rights and the Federal Transit Administration Office of Civil Rights. The DOT regulations for implementing the requirements of Title VI of the Civil Rights Act encourage informal resolution. Metro will engage the Labor Community Strategy Center to determine if an informal resolution can be reached.

We have informed the DOT and FTA that all of our fare enforcement staff enforce the law equally and do not engage in stop and frisk. If Metro were to learn of such action occurring on our system we would put an immediate and permanent stop to the practice. Fare enforcement is conducted without regard to race, color or national origin consistent with the provisions of Title VI of the

Civil Rights Act. Immediate corrective action will be taken if this requirement is not being followed.

Metro has also sought to decriminalize fare enforcement by transferring the processing of citations from the Superior Court to Transit Court at Metro. When legislation allowing us to create Transit Court was approved by the State Legislature it was limited to adult offenders. New legislation has now been passed by the State that allows Metro to extend this decriminalization to young offenders.

Subsequent to the filing of the complaint against Metro and the Sheriff's Department the responsibility for fare enforcement was shifted away from the Sheriff to a completely civilian force directly employed by Metro.

Metro staff and Transit Court in conjunction with the Metro Office of Civil Rights are developing new initiatives to ensure that fare enforcement is conducted equitably and that violators are similarly dealt with fairly and equitably throughout the enforcement process. In addition, Metro will train all of its fare enforcement officers to recognize and overcome implicit racial bias.

NEXT STEPS

Metro will be sending a letter to the DOT acknowledging receipt of the complaint. The DOT and FTA encouraged Metro and the Sheriff to meet with the Labor Community Strategy Center in order to seek a voluntary resolution of the complaint. We will be pursuing a meeting with the Labor Strategy Center to open discussions on the issues raised in the complaint to the DOT.