



U.S. Department of Justice

Civil Rights Division

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December 7, 2016

VIA U.S. AND ELECTRONIC MAIL

Commissioner Richard J. Ross, Jr.
City of Philadelphia Police Department
Franklin Square
Philadelphia, PA 19106

Mr. Francis Healy
Counsel to the Commissioner
City of Philadelphia Police Department
Franklin Square
Philadelphia, PA 19106
Francis.Healy@phila.gov

Re: The United States' Findings and Conclusions Based on its Review Under Title II of the Americans with Disabilities Act of the City of Philadelphia and its Police Department, DJ No. 204-62-226

Dear Commissioner Roth and Mr. Healy:

We write regarding the United States Department of Justice (the Department or DOJ) review of the City of Philadelphia and its Police Department (PPD) for alleged violations under title II of the Americans with Disabilities Act of 1990 (ADA), as amended, 42 U.S.C. §§ 12131-12134, and the regulation implementing the ADA, 28 C.F.R. Part 35. We reviewed PPD's disability communication-related policies, practices and procedures after receiving a complaint alleging that PPD failed to provide effective communication to a deaf individual during his arrest and detention.

In the course of our investigation, the Department interviewed a number of deaf individuals—ranging from detainees to crime victims—who contend that PPD denied them

effective communication. We also interviewed PPD representatives and reviewed PPD's policies and practices relating to the provision of auxiliary aids and services to individuals who are deaf or hard of hearing. Following our review, the Department finds that PPD discriminated against individuals with disabilities in the following manner:

1. Failing to take appropriate steps to ensure that communication with individuals with disabilities is as effective as communication with others;
2. Failing to provide auxiliary aids and services necessary to ensure effective communication with individuals who are deaf;
3. Failing to give primary consideration to an individual's requested auxiliary aid or service of choice and failing to provide an equally effective alternative;
4. Inappropriately relying on a crime victim to interpret for her deaf roommates;
5. Failing to sufficiently train PPD staff and officers on how to assess the need for and to secure auxiliary aids and services; and
6. Failing to notify the courts that detainees are deaf prior to video arraignments held at PPD facilities.

By engaging in these practices, PPD denies individuals with disabilities a full and equal opportunity to participate in and benefit from PPD's programs, services, and activities. Set forth in greater detail below are the Department's findings of fact and conclusions of law, as well as the minimum steps PPD must take to remedy the violations identified herein.

I. BACKGROUND AND FINDINGS OF FACT

In addition to the original complainant, Mr. Adams, over the course of our investigation we identified four additional individuals who have similarly been denied effective communication in their interactions with PPD officers. Our findings are based on interviews with complainants, witnesses, and PPD representatives and on a review of PPD's policies and practices.

i. Mr. Adams¹

On June 21, 2013, Mr. Adams was arrested while attending his brother's sentencing hearing. PPD arrested Mr. Adams when, upon learning of his brother's sentence, he threw his bracelet, which struck two people. Thereafter, Mr. Adams was handcuffed and escorted out of the courtroom. Because his hands were restrained behind his back, Mr. Adams was unable to communicate using American Sign Language (ASL), his primary language. Mr. Adams' mother and his friend informed the PPD detective conducting the arrest that Mr. Adams is deaf. It was Mr. Adams' first arrest; he was 23 years old.

¹ The complainants' names have been changed to protect their privacy.

Upon his arrest, Mr. Adams was escorted to the PPD detective's office. The detective, seeking to explain the detention process to Mr. Adams, asked the sergeant on duty if he knew of anyone who could communicate in sign language. The sergeant identified a radio room staffer who purportedly had some sign language ability. The detective and radio room staffer attempted to communicate with Mr. Adams, but Mr. Adams did not understand what the radio room staffer was signing. Mr. Adams communicated his confusion with gestures and by writing a note that asked the radio room staffer, "are you a qualified sign language interpreter?" Upon learning that the radio room staffer was unqualified, Mr. Adams requested a qualified interpreter. Following this request, the detective stopped the conversation, determining that his attempt to explain the detention process to Mr. Adams had been unsuccessful. PPD took no further action to ensure that Mr. Adams was provided effective communication. PPD returned Mr. Adams to the detention area, where he was held for 16 hours.

Early the next morning, Mr. Adams was arraigned via video at the PPD facility. The video was inaccessible to Mr. Adams because it was not captioned, and Mr. Adams could not understand the judge. PPD provided no auxiliary aids or services to Mr. Adams, nor did PPD inform the court that Mr. Adams is deaf. Upon being arraigned, Mr. Adams was provided documentation that indicated he had been charged with simple assault, and he was released. Because there were no telecommunication systems for the deaf available at the PPD facility, Mr. Adams wrote a staffer a note requesting that someone call his mother to ask her to come get him.

On August 24, 2013, PPD arrested Mr. Adams at his home for failing to appear at a hearing related to the earlier arrest. In actuality, the hearing had been continued to a later date, and thus Mr. Adams had not failed to appear. At the time of this arrest, officers knew or should have known that Mr. Adams is deaf because, as of his first arrest, PPD's electronic detainee tracking system reflected Mr. Adams' disability. Mr. Adams was again handcuffed with his hands behind his back, such that he could not sign or write. Mr. Adams' mother asked PPD officers to release his hands so that he could sign; the officers refused, but ultimately agreed to handcuff him in the front so that he could sign. While handcuffed, Mr. Adams explained, using ASL with his mother interpreting for him, that the hearing date had been changed. The officers asked for documentation to prove the change but would not allow Mr. Adams to search for the letter. Mr. Adams was taken to a PPD precinct to be processed and detained.

Once he arrived at the precinct, PPD staff took Mr. Adams' blood, administered a tuberculosis test and urine test, strip-searched him, and provided him a uniform to wear. While he was being processed, Mr. Adams could not understand what officers and staffers said. During his hours-long detention, Mr. Adams felt confused, frustrated, and unable to rectify with staffers and officers that the arrest was in error. When Mr. Adams was released, he requested a telecommunication system for the deaf, but the one provided by PPD did not work.

ii. Ms. Black and Ms. Cruz

On October 4, 2013, the Philadelphia home that Ms. Black and Ms. Cruz shared with their three roommates was burgled. Ms. Black, Ms. Cruz and their three roommates are deaf and

communicate with ASL. Ms. Black wears a cochlear implant and can speak, but she does not feel comfortable interpreting. When Ms. Black and Ms. Cruz realized that many of their valuables were missing, they asked their neighbor, who is hearing, to call PPD. To facilitate communication with officers, the roommates wrote a statement indicating they are deaf, specifying what had been taken, and requesting that the officers communicate with them in writing. When an officer arrived, Ms. Cruz gave him their statement. In response, the officer asked Ms. Cruz if she could read lips. Ms. Cruz responded, with gestures, “No, because I’m deaf,” and she asked the officer to communicate in writing. The officer again asked Ms. Cruz if she could read lips. She repeated, “No.” The officer proceeded to ask each of Ms. Cruz’s roommates whether any of them could read lips, and like Ms. Cruz, they indicated that they could not and requested written communication.

With gestures, Ms. Black requested that the officer read the roommates’ statement, but the officer continued to speak to the roommates. Eventually, he read the statement, but soon thereafter said, “Okay, so tell me what happened.” Finally, out of frustration, Ms. Black said, “You should write back and forth with us.” When she spoke, the officer said, “You can talk!” and he asked her to interpret for her roommates. Ms. Black told the officer that she was the victim of a crime and she did not feel comfortable interpreting. Ms. Cruz observed the officer reply, “but you *can* talk.” Eventually another PPD officer arrived. Ms. Black requested, through gestures, that he read the roommates’ statement and communicate in writing. The officer shrugged and the officers left without taking the roommates’ statement, inspecting the home, or otherwise investigating the burglary.

Later that day, the roommates went to PPD’s 15th District Precinct to file a report. They requested an interpreter but were told that an interpreter would not be available for a few hours. Exhausted and frustrated by the burglary and their interaction with the officers, they agreed to communicate in writing with a PPD staffer. The staffer referred to the report that the officers filed upon returning from the roommates’ home and told them that it said “nothing was stolen.” The roommates informed the staffer that the officers had failed to inspect the home or interview the roommates about the burglary. Soon thereafter, the roommates moved from Philadelphia, in part because they no longer felt safe or that they could rely on the PPD for help.

iii. Mr. Lee

In September 2011, Mr. Lee, who is deaf and communicates using ASL, was arrested by PPD for auto theft because he was riding as a passenger in a stolen vehicle. It was Mr. Lee’s first arrest; he was 20 years old. While being arrested, Mr. Lee’s glasses fell off and one of the lenses broke. Soon after, he observed an officer pick up his glasses and throw them away. He tried to indicate to the officers that he needed his glasses by gesturing towards his eyes, but he had limited dexterity because his hands were tightly handcuffed behind his back. Without his glasses, Mr. Lee cannot see well, such that, “everything appears blurry, like opening your eyes under water.” Mr. Lee was taken to PPD’s 15th District Precinct for processing. PPD officers took his wallet and placed him in a detention cell for what Mr. Lee remembers was anywhere from two to three nights. While detained, Mr. Lee attempted to communicate with a PPD officer by gesturing for pen and a paper, but the PPD officer ignored his request. Mr. Lee was not

provided an opportunity to make a phone call; and, according to PPD, the 15th District Precinct does not have telecommunication devices for the deaf.

When Mr. Lee was arraigned via video at a PPD facility, the video was inaccessible to him because it was not captioned. Mr. Lee indicated to officers, through ASL and gestures, that he could not understand the judge, but the officers just pointed to the video. PPD does not know whether the judge presiding over the arraignment knew that Mr. Lee is deaf, and it had no protocol in place to inform the court that Mr. Lee, a first time arrestee, is deaf. When the judge finished speaking, the officers gestured to Mr. Lee that he could leave. At the time that he left the PPD facility, Mr. Lee did not know that he had been charged with a felony. During his arrest and detention, Mr. Lee felt scared and distressed because he could not see or understand what was happening.

iv. Mr. Jackson

On March 12, 2011, Mr. Jackson, who is deaf and communicates using ASL, was arrested for auto theft by PPD officers. It was Mr. Jackson's first arrest; he was 19 years old. PPD officers took Mr. Jackson's belongings out of his pocket and asked him questions that he could not understand. Mr. Jackson gestured to indicate that he is deaf, but the officers continued to speak to him. Eventually, Mr. Jackson vocalized to indicate that he doesn't talk. An officer continued to yell at him, however, and Mr. Jackson did not understand what she said.

Mr. Jackson was then taken to a PPD precinct where he was processed and detained. While detained, Mr. Jackson gestured for pen and paper, but the officers ignored his request. Mr. Jackson eventually banged his hand through a detention cell food slot, to signal that he needed help, but stopped when an officer appeared to be agitated by this. Mr. Jackson was not provided an opportunity to make a phone call independently, though an officer eventually offered to call his parents for him. After being detained for what may have been days, Mr. Jackson was arraigned through video at the PPD facility. The video was inaccessible to Mr. Jackson because it was not captioned, and he did not understand what the judge said. Mr. Jackson pointed to his ears to convey that he is deaf, but the officers took no action. It was Mr. Jackson's first arrest, so it is unlikely that the court would have independently known of his disability and his need for auxiliary aids and services. When the judge finished speaking, an officer handed Mr. Jackson a piece of paper that said, "ROR." Mr. Jackson gestured that he did not understand what it meant, and in response, an officer wrote a note that said, "Go home." Mr. Jackson, not understanding that he had been charged with a felony, assumed this meant that the charge had been dismissed.

b. PPD's Communication-Related Policies and Practices

Since 2001, PPD has been subject to the City of Philadelphia Sign Language Request Policy, which, consistent with title II of the ADA, generally requires the City to, "furnish auxiliary aids and services to individuals with disabilities when necessary to ensure effective communication."² The policy further states that when a department has a telecommunications

² 2001 City of Philadelphia Sign Language Request Policy at 1-2.

device for the deaf, employees should be trained to use it, and when such a device is unavailable, employees should be aware of the Pennsylvania Relay Service as an alternative means of accessible communication.

Since 2014, and *after* the incidents described herein, PPD has adopted limited directives addressing the provision of auxiliary aids and services in specific contexts. In 2014, PPD adopted Directive 151-5, which states, “According to Pennsylvania law, ‘upon the arrest of any person who is deaf and prior to interrogation, PPD detective shall make available to the person who is deaf an interpreter who shall be present with the person who is deaf throughout the interrogation.’” Additionally, PPD represents that it now has a contract with an interpreting agency to provide qualified sign language interpreters for interviews and interrogations.

In 2015, PPD also adopted Directive 82-5, Appendix F, Adult Detainees in Police Custody, purportedly based, in part, on the DOJ 2006 Guidance on Communicating with People who are Deaf or Hard of Hearing-ADA Guide for Law Enforcement. In relevant part, Directive 82-5, Appendix F states:

Communications with Deaf and Hard of Hearing persons, upon arrest, will be conducted with hand gestures, and by writing. Under controlled conditions and when safe to do so, arrestees who are deaf or hard of hearing should be restrained in a manner that allows for communication without jeopardizing the safety of the [PPD] members, the arrestee, or others. If the person is to be interrogated, personnel must comply with the procedures set forth in Directive 151. (Internal citations omitted).³

PPD’s policies do not reach other aspects of its services, including booking, detention, arraignment and telephone calls, nor do these policies address interactions with victims of crimes or members of the general public. PPD has no policies explaining how to provide auxiliary aids or services during booking or, for example, during its medical evaluation intake process. PPD also acknowledged that it does not have auxiliary aids available for arraignment and, thus, no auxiliary aids are provided to deaf individuals arraigned at its facilities. Further, PPD has not trained its officers on how to use the Pennsylvania Relay System for detainees who have hearing disabilities and need auxiliary aids and services to ensure effective telephone communications.

II. CONCLUSIONS OF LAW

In 1990, Congress enacted the ADA in response to the “clear and compelling mandate” to eliminate discrimination against individuals with disabilities. H.R. Rep. No. 101-485 (II), at 50 (1990), *reprinted in* 1990 U.S.C.C.A.N. 303, 332. Under title II of the ADA, individuals may

³ Notably, DOJ’s 2006 Guidance on which this policy is purportedly based is significantly more comprehensive than PPD’s policy, providing two pages of guidance about communications with individuals who are deaf or hard of hearing. *See* People who are Deaf or Hard of Hearing-ADA Guide for Law Enforcement at, <http://www.ada.gov/lawencomm.htm> (last visited, June 23, 2016).

not, on the basis of disability, be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such public entity. 42 U.S.C. § 12132.

The title II regulation, set forth in 28 C.F.R. Part 35, provides that public entities shall take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others.” 28 C.F.R. § 35.160(a)(1). To that end, a public entity must furnish appropriate auxiliary aids and services when necessary to afford qualified individuals with disabilities an equal opportunity to participate in its services or programs. 28 C.F.R. § 35.160(b)(1). Auxiliary aids and services may include qualified interpreters, transcription services, written materials, text telephone (TTY) devices, video remote interpreting (VRI) services, and other communication methods. 28 C.F.R. § 35.104. The type of auxiliary aid necessary to ensure effective communication will vary in accordance with the method of communication used by the individual, the nature, length, and complexity of the interaction, and the context in which the interaction is taking place. 28 C.F.R. § 35.160(b)(2). In determining what types of auxiliary aids and services are necessary, the public entity must give primary consideration to the requests of individuals with disabilities. *Id.* Further, PPD is prohibited from relying on an adult accompanying an individual with a disability to interpret or facilitate communication when it is not an emergency involving an imminent threat to safety or when no individual with a disability has made such a request. 28 C.F.R. § 35.160(c)(2). Moreover, PPD is prohibited from using administrative methods that defeat or substantially impair accomplishment of PPD’s objectives with respect to individuals who are deaf. 28 C.F.R. § 35.130(b)(3)(ii). In meeting its effective communication obligations, PPD is not required to take any action that it can demonstrate would result in a fundamental alteration in the nature of its service, program or activity or in undue financial and administrative burdens. 28 C.F.R. § 35.164.

Under the ADA, a “public entity” is “any State or local government,” and “any department, agency, special purpose district, or other instrumentality of a State or States or local government.” 28 C.F.R. § 35.104. PPD is a public entity subject to title II of the ADA. As such, PPD must ensure effective communication with individuals with disabilities and it must not use administrative methods that defeat or substantially impair accomplishment of the City’s objectives with respect to deaf individuals. Specifically, absent fundamental alteration or undue financial or administrative burden, PPD must provide appropriate auxiliary aids or services as necessary to ensure that communications with individuals with disabilities are as effective as communications with others.

a. PPD Failed to Take Appropriate Steps to Ensure Effective Communication.

i. PPD Fails to Furnish Appropriate Auxiliary Aids or Services When Necessary to Afford Deaf Individuals an Equal Opportunity to Participate in and Benefit from its Services.

The Department finds that PPD violated title II by failing to provide auxiliary aids to ensure effective communication during the arrest and detentions of Mr. Adams, Mr. Lee and Mr. Jackson. With respect to Mr. Adams, PPD sought to communicate through the use of an unqualified interpreter who Mr. Adams could not understand. When Mr. Adams requested a

qualified interpreter, PPD ended the conversation and took no further steps to ensure that he was provided effective communication. When Mr. Adams was arrested again, the absence of auxiliary aids and services meant that he was not provided an opportunity to rectify with PPD that the arrest was in error and he could not understand what was said during processing or ask questions. As to Mr. Lee, PPD did not take appropriate steps to ensure that Mr. Lee could communicate with arresting officers and ignored his request to communicate with pen and paper during his detention. And similarly, with Mr. Jackson, PPD continued to speak to him despite Mr. Jackson conveying to officers that he is deaf and did not understand them, and ignored his requests for pen and paper during his detention.

PPD also failed to provide telecommunication systems for the deaf to Mr. Adams, Mr. Lee and Mr. Jackson. Mr. Adams was initially told that PPD did not have telecommunications systems for the deaf, and after his second arrest he was provided with a non-functional device. On both occasions, the Pennsylvania Relay Service (PRS) was available to PPD, but PPD staff did not know how to use it. Mr. Lee and Mr. Jackson were similarly not permitted to make phone calls independently. PPD's practice requires deaf individuals to rely on staff for telephone communications, and fails to provide individuals who are deaf of the services made available to hearing detainees.

Similarly, PPD violated title II of the ADA when its officers continually ignored Ms. Black's and Ms. Cruz's requests to communicate in writing when PPD responded to the burglary of their home. Instead, PPD officers repeatedly inquired about whether the roommates could read lips and continued to speak to them. PPD's failure to communicate effectively is underscored by the inaccurate incident report the officers filed, which incorrectly concluded that nothing was stolen. By refusing to provide any needed auxiliary aids or services, PPD failed to provide communication that was as effective as that provided to individuals without disabilities and denied the roommates the benefit of PPD's services.

Finally, with respect to all complainants in this matter, PPD both failed to give primary consideration to the individual's requested auxiliary aid or service of choice and to provide an equally effective alternative. Specifically, the PPD detective ignored Mr. Adams request for a qualified interpreter, and instead provided him with an unqualified interpreter whom he could not understand. Ms. Black's and Ms. Cruz's request to communicate in writing were similarly ignored, with the officers insisting on speaking, a communication method that Ms. Black and Ms. Cruz could not effectively engage in. Mr. Lee and Mr. Jackson's request for pen and paper were ignored and they, too, were provided with no alternative.

ii. PPD Improperly Relied on an Adult Accompanying Individuals With Disabilities to Interpret and Facilitate Communication.

The Department finds that PPD violated title II by pressuring Ms. Black to interpret for her deaf roommates. Despite the fact that Ms. Black and her roommates had previously requested that communication be in writing, the officer attempted to persuade Ms. Black to interpret by repeatedly making comments about her ability to speak. In addition to feeling uncomfortable interpreting, Ms. Black was the victim of a crime who had reached out to PPD for

help. Instead of taking steps to secure the auxiliary aids and services necessary to ensure that Ms. Black was provided effective communication, the officer seemed to expect Ms. Black to act as interpreter. No exceptions to the ADA prohibition on relying on an adult accompanying individuals with disabilities to interpret or facilitate communication apply in this circumstance. There was no emergency threatening safety; the roommates had not requested that the deaf individual interpret for them.

iii. PPD Fails to Take Appropriate Steps to Train Officers and Staff on Its Effective Communication Obligations.

The Department finds that PPD failed to train its officers and staff on how to assess the need for and how to secure auxiliary aids and services to ensure effective communication, resulting in violations of the ADA. Since 2001, PPD has been subject to the City of Philadelphia communication-related policy, which requires the provision of auxiliary aids and services to individuals who are deaf or hard of hearing. It was not until 2014 that PPD began to implement, through the adoption of targeted directives, a limited subset of the City’s communication-related policy. While PPD has made progress, it continues to fail to provide staff and officers sufficient information about how to assess the need for and secure auxiliary aids and services, and how the effective communication obligation relates to booking, processing, detention, arraignment and telephone calls.

As this matter demonstrates, when officers and staff are not provided comprehensive training and guidance on the effective communication obligation, they are likely to misapprehend the steps necessary to comply with that obligation. Here, that lack of training and guidance resulted in PPD officers and staff repeatedly failing to properly assess and meet the communication-related needs of individuals with hearing disabilities.

B. PPD’s Administrative Methods Defeat or Substantially Impair Accomplishment of Its Objectives with Respect to Deaf Individuals.

The Department finds that PPD violates the ADA by failing to inform another City agency, the municipal courts, that detainees awaiting arraignment via video at PPD facilities are deaf. This practice denies such detainees an effective opportunity to participate in court proceedings. Currently, PPD does not have any protocols for informing the court conducting video arraignments that detainees are deaf or hard of hearing. Further, according to PPD, the closed circuit television system used for arraignments does not support closed captioning.

At least some of PPD’s “objectives” with respect to individuals who are deaf are contained in the City’s communication policies, which expressly require that “all City information provided to the public orally must be made available in alternate, accessible format to people who are deaf or hard of hearing upon request.”⁴ An arraignment certainly meets this threshold. By the time of any given arraignment on a PPD facility, PPD staff know whether a detainee is deaf, and PPD is uniquely positioned to inform the court if auxiliary aids or services may be necessary in order to ensure effective communication. Indeed, PPD hosts the video

⁴ 2001 City of Philadelphia Sign Language Request Policy at 1-2; *see supra* at 6.

arraignments and arrestees are in PPD's custody during arraignments. None of the deaf individuals in this matter were provided auxiliary aids or services necessary for effective communication during their arraignments. As a result, Mr. Adams, Mr. Lee and Mr. Jackson did not understand their arraignments, and Mr. Lee and Mr. Jackson left the arraignment without knowing their respective charges. PPD's failure to inform the court denies individuals who are deaf of an effective opportunity to participate in court proceedings in violation of the ADA.

III. Remedial Measures

To remedy the violations discussed above and to protect the civil rights of individuals with hearing disabilities, PPD must at least take the following steps:

1. Ensure that appropriate auxiliary aids and services, including qualified interpreters, are made available when such aids and services are necessary to ensure effective communication with persons who are deaf or hard of hearing.
2. Contract with qualified interpreter agencies to ensure that qualified interpreting services will be available at any time to PPD on a priority basis.
3. Take appropriate steps to ensure that all PPD personnel having contact with individuals who are deaf or hard of hearing understand how to assess the need for and to secure auxiliary aids and services.
4. Provide notice to persons who are deaf or hard of hearing with whom PPD interacts of the availability of appropriate auxiliary aids and services, including qualified sign language interpreters.
5. Give primary consideration to the expressed preference for a particular auxiliary aid or service from an individual who is deaf or hard of hearing.
6. When handcuffing a person who is deaf or hard of hearing who uses ASL to communicate, PPD personnel will, safety permitting, handcuff the person in front to enable the person to better communicate using sign language or writing.
7. Provide telecommunication systems to individuals who are deaf or hard of hearing that are equally effective as those provided to individuals without disabilities.
8. Notify the court when detainees are deaf or hard of hearing with sufficient notice to ensure time for the provision of auxiliary aids or services for individuals who are deaf or hard of hearing.
9. Provide training to all PPD personnel who have contact with members of the public on PPD's effective communication obligations under the ADA.
10. Provide monetary relief to individuals aggrieved by PPD's violation of the ADA.

IV. Conclusion

We hope to work together with you to resolve our concerns regarding PPD's effective communication with individuals with hearing disabilities. The Department would like to resolve this matter cooperatively through a consent decree that brings PPD into compliance with the

ADA. 28 C.F.R § 35.173. In the event that we are unable to reach such a resolution, the Attorney General may initiate a lawsuit pursuant to the ADA. 42 U.S.C. § 12133; 28 C.F.R § 35.174. Please contact Charlotte Lanvers at (202) 305-0706 or charlotte.lanvers@usdoj.gov within two weeks of the date of this letter if you are willing to resolve this matter voluntarily or if you have any questions regarding this letter.⁵

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rebecca B. Bond', with a long horizontal flourish extending to the right.

Rebecca B. Bond
Chief
Disability Rights Section

⁵ Please note that this Letter of Findings is a public document and will be posted on the Civil Rights Division's website.