



May 21, 2021

City of Wilmington Responds to Wilmington Parking Coalition

The City of Wilmington today responded to a series of emails from the Wilmington Parking Coalition, comprised of Kailyn Richards, Policy Coordinator, Delaware Center for Justice, Inc.; Coby Owens, DE NAACP; Steve Villanueva, Vice President, Latin American Community Center; Robert Johnson, Senior Attorney, Institute for Justice; Drew Serres, Co-Founder, Network Delaware; and Ken Grant, Public and Government Affairs Manager, AAA Mid-Atlantic.

The coalition sent the City four separate email communications regarding parking enforcement, ticketing, towing, etc., on April 20, 2021, April 26, 2021, April 30, 2021, and May 11, 2021. We have reviewed each email for its data, questions raised, claims made, accusations leveled, etc.

The coalition emails suggest improprieties on the part of the city regarding the implementation of its ticketing and towing practices. The not so veiled allegations imply that the city and its agents (the towing contractor) take advantage of Wilmington residents and others by unjustifiably towing automobiles and then selling them before the owners have a fair opportunity to redeem them. Further allegations are that the city issues parking tickets outside of a perimeter where ticketing is legal thereby profiting from an illegal practice. The coalition suggests that our Parking Enforcement Officers have ticketing quotas and that the practices in question all have a profit motive for the City and that due process is being denied our citizens. Unfortunately, this is a consistent theme underlying virtually all of the inquiries.

The response to these emails has required an extraordinary amount of staff time to research each claim, allegation or conclusion and to summarize our findings. The information contained herein represents the most reliable analysis we can perform. We are confident with the essence of our findings. The city's towing and ticketing practices are consistent with the law and are performed with due process afforded to the public and ethical standards of conduct. Vehicle owners are not being taken advantage of. No one is being denied an appeal. And as will be obvious with respect to issuance of parking tickets, booting and towing, there is no profiteering on the part of the City of Wilmington. While the facts run counter to the coalition's suspicions, we are confident in our findings which show virtually no improprieties uncovered by our research. The city is simply doing its best to enforce its laws. In the very few cases where

tickets were improperly documented although otherwise properly issued, the city has voided these tickets.

The following are responses to each communication based on the date received:

Coalition Email of April 20, 2021

The email received on this date contains incorrect statistical information and incorrect conclusions or accusations. The coalition either misunderstands or has ignored the difference between towing for standard parking violations (which was suspended during the pandemic) and towing that was uninterrupted during the pandemic for more serious matters such as blocking fire hydrants and intersections and for motor vehicles accidents or police investigations.

Here are the correct charts of the City’s towing history for 2019 and 2020. More than 1,700 fewer vehicles were towed during the pandemic year of 2020 versus 2019, reflecting the City’s decision not to tow vehicles for certain parking violations. The chart for 2020 also shows that for the pandemic months of April through December of 2020, the City towed **zero (0) vehicles, reflected by the Paylock data noted below**, for parking citations.

Tows by Department - FY 2019				
Month	Finance*	Paylock**	WPD	Total
Jan-19	42	33	263	338
Feb-19	53	32	239	324
Mar-19	41	24	248	313
Apr-19	42	20	211	273
May-19	48	32	257	337
Jun-19	29	35	224	288
Jul-19	34	31	233	298
Aug-19	42	28	258	328
Sep-19	37	40	261	338
Oct-19	28	36	270	334
Nov-19	30	34	255	319
Dec-19	27	29	169	225
Subtotal	453	374	2888	3715
Tows by Department - FY 2020				
Month	Finance*	Paylock**	WPD	Total

Jan-20	56	55	159	270
Feb-20	64	35	158	257
Mar-20	12	5	111	128
Apr-20	12	0	134	146
May-20	29	0	65	94
Jun-20	26	0	186	212
Jul-20	55	0	229	284
Aug-20	76	0	239	315
Sep-20	74	0	92	166
Oct-20	84	0	185	269
Nov-20	65	0	155	220
Dec-20	26	0	164	190
Subtotal	579	95	1877	2551

2019/2020	Finance*	Paylock**	WPD	Total
Total	1032	469	4765	6266

* Tows for Abandoned Vehicles

** Tows for Delinquent Tickets

While not perfect and always striving for improvement, the City of Wilmington’s parking enforcement system is intended to ensure that residents have adequate parking in their neighborhoods and that business owners and shoppers/consumers have access to commercial areas. In addition, we are legally obligated to ensure that vehicles do not cause public safety issues by blocking rush-hour lanes, tow-away zones, driveways, sidewalks, ADA accessible ramps, intersections, and first responder access points and those that have been abandoned. The City, through the police department, also tows abandoned vehicles as well as vehicles involved in police investigations, accidents, etc.

Currently, the cost of providing parking enforcement services in Wilmington exceeds the revenue generated by the program, even prior to the suspension of certain ticketing during the pandemic. Your coalition falsely cast doubts regarding the veracity of City parking enforcement, characterizing the City’s efforts as a revenue raising scheme. This is simply untrue. Parking enforcement revenue in 2014 totaled about \$4 million, declined steadily to \$3 million by 2019. The pandemic has further accelerated the revenue decline to \$2.2 million in 2020 to a projected \$1.5 million in 2021.

Here are more facts and observations:

- Parking enforcement is a challenging program to manage for any City where there is a need to satisfy competing interests of the resident/consumer and businesses. The

process is made more challenging by intentional or unintentional disregard for traffic and parking laws and by various degrees of either intentional or unavoidable delinquent behavior regarding payment of fines. A successful parking enforcement system requires strict enforcement which some find objectionable. But just because some people do not agree with the need for parking enforcement, that does not mean, as you have falsely implied, that the system is mismanaged or corrupt. Also, please keep in mind that the parking enforcement unit is enforcing the very laws that City Council has legislated over decades.

- There has never been any type of quota associated with the work or performance standards of City parking enforcement officers.
- Wilmington has had a standing offer in place for many years to resolve problems or concerns with parking enforcement that are not settled through the parking enforcement process. Call either the Constituent Services Office or the Mayor's Office and the City will review any claim or concern to ensure that a matter was handled properly. We have done this many times, as members of the coalition know well, and many times have prevented misunderstandings about parking regulations or misinformation being shared.

Here are some additional facts that are important to understanding the parking enforcement system:

- From March 24, 2020 through July 20, 2020, the City suspended parking enforcement for limited time, metered parking, towing related to parking ticket delinquencies and all booting. Other serious traffic violations have been continuously enforced with no break or suspension.
- After July 20, 2020, the City resumed issuing tickets for violations of limited-time metered parking in the Downtown Business District (bounded by MLK, Walnut Street, 11th Street, and Washington Streets) and in the Riverfront District.
- Since March of 2020, Parking Enforcement has suspended booting and towing related to all parking ticket delinquencies. Towing was never suspended for violations related to safety matters such as blocking fire hydrants, loading zones, tow-away zones, driveways, intersections, or removing abandoned vehicles.

- Wilmington Police Department also directs the towing of vehicles relating to accidents, evidence in criminal cases, abandoned vehicles, and other safety issues such as keeping traffic clear in restricted lanes or tow-away zones.
- City Towing Services was selected in December 2019 as the City's towing vendor. City Towing generates revenue from salvaging or selling cars that are not retrieved by customers. This is a common practice within the towing industry and is governed by the laws of the State of Delaware. To retrieve a towed vehicle, a customer must pay all delinquent ticket charges and a \$25 release fee. Often, a customer will owe more in delinquent charges than the vehicle is worth, thus they make the decision to abandon their vehicle at City Towing. **Since January 1, 2020, 987 vehicles out of the 2,551 total vehicles towed by City Towing have been abandoned by their owners.** If an individual has been towed for non-payment of tickets, the value of the tickets would only reach this point if they were a chronic or intentional violator of the law.

Here is a chart of tows from 2020 showing the number of vehicles released by the towing company to vehicle owners versus the number of vehicles abandoned at the tow yard by owners:

Tows by Department - FY 2020						
Month	Finance*	Paylock**	WPD	Total	Released	Pct. Released
Jan-20	56	55	159	270	141	52.2%
Feb-20	64	35	158	257	129	50.2%
Mar-20	12	5	111	128	101	78.9%
Apr-20	12	0	134	146	94	64.4%
May-20	29	0	65	94	115	122.3%
Jun-20	26	0	186	212	117	55.2%
Jul-20	55	0	229	284	194	68.3%
Aug-20	76	0	239	315	145	46.0%
Sep-20	74	0	92	166	150	90.4%
Oct-20	84	0	185	269	138	51.3%
Nov-20	65	0	155	220	140	63.6%
Dec-20	26	0	164	190	100	52.6%
Subtotal	579	95	1877	2551	1564	61%
				Abandoned	987	38.7%

Here are specific responses to coalition questions and concerns (italicized) in its April 20, 2021 correspondence:

1. *In 2019 and 2020, approximately 4,000 vehicles were reclaimed after being towed, but it appears only 35 owners owed the city money for past citations, why were so many other vehicles towed?*

As explained earlier, the City's Parking Enforcement Office and the Wilmington Police Department tow vehicles for multiple reasons. The vehicles towed in 2019 and 2020 were towed appropriately.

2. *Since there was approximately a 60% drop in the number of parking tickets issued in 2020 compared to 2019 – and the city has been claiming towing was suspended in the spring of 2020, why was there only a 3% drop in the number of tow release fees paid?*

Again, vehicles are towed for various legitimate reasons other than for outstanding parking tickets. The statistics you cite do not point to any unusual or improper towing trends.

3. *Can the city provide evidence that vehicle owners are now being properly notified when their vehicle is towed and those owners are given a clear opportunity to reclaim their vehicle?*

Yes. City Towing provides the City with a monthly record of all vehicle owners who were contacted after their vehicle was towed. The City is satisfied that City Towing has made every available effort to contact vehicle owners. A towing vendor DOES NOT have access to vehicle records maintained by the Delaware Department of Motor Vehicles. The towing vendor receives the name, address, and telephone number (when available) of the owner of towed vehicles from the Parking Enforcement Office or from the WPD. City Parking Enforcement Officers (PREOS) and police officers do have access to vehicle registration information including owner and registration address. However, the accuracy of this information is dependent upon the vehicle owner filing accurate information with State Motor Vehicle.

4. *Under a contract amendment dated February 26, 2020, the city now incentivizes the company contracted to handle booting and collections in the city by giving that company 30% of the net revenue from collection efforts – given the city's admission that it rarely*

provides any kind of oversight to protect the rights of its citizens, what evidence can the city offer that this incentive is not being abused?

This claim is misleading. Hiring an outside company to collect delinquent fees and fines is not at all unusual and to imply that there is something improper about it is unfortunate to say the very least. Traffic fines and fees are hard to collect and more so as they age. Some delinquent owners live or have moved out-of-state. Incentivizing a company to reduce delinquencies is an efficient way to resolve a problem. The company hired by the City for this task, Conduent, was hampered by COVID restrictions in 2020 and has, thus far, collected less than \$18,335 of the \$4.2 million owed the City. We expect the company to improve its performance as COVID restrictions ease this year. The City also announced an amnesty program for ticket delinquencies in February of this year, but just \$12,107 has been collected this far. Again, parking tickets are notoriously hard to collect. The payment rate for tickets issued in 2019 was 63.81% and the payment rate for tickets issued in 2020 was 47.45%. Even though there are registration suspension options available in Delaware to force payments, vehicle owners can now receive as much as a seven-year registration, rendering that enforcement option less and less useful. 31% of the citations issued in Wilmington are for out-of-state vehicles, and Wilmington has no reciprocity agreements.

5. Can we review the Office of Civil Appeals rulings and notifications?

Yes, these documents are available for review, however, we will redact personal information as stipulated under FOIA laws. The following is summary information for six years from the Civil Appeals Office:

Boot/Tow Appeal Final Disposition- 2016- January 2021

Year00	# of Appeals	# Approved	# Denied	# No Show
2016	42	8	34	0
2017	55	17	36	2
2018	94	31	56	7
2019	97	37	45	15
2020	11	5	6	0
2021	0	0	0	0

From this data, there is a consistent average disposition of appeals denied, 70%, and accepted, 30%, over a six-year period. In addition, given that there were over 500,000 tickets issued during this period, the appeal rate (just 299 appeals in six years) is less than .0001%.

Regarding other observations or comments in your coalition email of April 20, 2021:

Towing in the city of Wilmington. *In reviewing data from the city, we see that in 2019, there were 2,028 drivers who paid at least \$25 to the city to release their vehicles after being towed. In 2020, in the midst of the Coronavirus shut down, 1,976 drivers paid at least \$25 to release their vehicles after being towed.*

Factual towing statistics are presented in the first chart on page one on this response. Again, towing related to delinquent parking tickets is not currently being enforced and towing related to other violations continues uninterrupted. There is nothing unusual about the numbers you cite, nor do they point to any improper management of the towing process.

We understand that the city uses towing as a way to get ticket scofflaws to pay for their parking tickets, but it looks like only fifteen (15) drivers paid more than the \$25 release fee in 2019, and only twenty (20) drivers paid more than the \$25 release fee in 2020. We are curious as to why the other 3,969 vehicles (plus other vehicles that were kept by the tow company after 30 days) were towed in that two-year period. Add to this the fact that the city claims to have suspended towing in the spring of 2020, yet the evidence suggests otherwise.

The numbers you cite do not suggest or confirm any irregularities with the parking enforcement system. Towing is used as a tool to force delinquent vehicle owners to pay their violation fine. However, towing is not the only way to secure payments. Booting (which has been suspended since March of 2020) is a more effective tool. And, of course, many people pay their fines on time to avoid penalties which are clearly stated on their citation. As for why vehicle owners do not claim their property from the tow yard, there are a variety of reasons, including owing more in fines than the vehicle is worth. While City Towing makes every available effort to notify the owner, an owner can call the City's Customer Service Center by dialing 311 and inquire as to the location of their vehicle. If the Parking Enforcement Office does not have the information, the police department will provide it.

Given the fact that parking tickets declined by approximately 60% in 2020 (from 63,283 to 25,850) we're also curious about why there didn't seem to be a significant difference in the number of vehicles towed.

Once again, towing is not relegated to just parking tickets.

*Please note that the approximately 4,000 vehicles only addresses the number that were reclaimed by their owners, not the total number of vehicles towed – which brings us to the next question about towing. **Towing Oversight.** In the Wilmington City Council Public Works and Transportation meeting held on September 16, 2019 (Item 5 - <http://wilmingtonde.swagit.com/play/09162019-848/> [r20.rs6.net]) – representatives from the administration stated that the city had failed to enforce the city towing contract which required the tow company to properly notify drivers when the city had their vehicles towed and that an*

estimated 500 vehicles a year were then being kept by the tow company under highly questionable circumstances. The question we have is this: Can the city offer evidence that drivers are now being properly and legally notified when the city tows their vehicle?

Yes. City Towing provides the City with a monthly record of all vehicle owners who were successfully contacted after their vehicle was towed. The City is satisfied that City Towing has made every available effort to contact vehicle owners. A towing vendor DOES NOT have access to vehicle records maintained by the Delaware Department of Motor Vehicles; however, the towing vendor receives the name, address, and telephone number (when available) of the owner of towed vehicles from the Parking Enforcement Office or from the WPD. City Parking Enforcement Officers (PREOS) and police officers do have access to vehicle registration information including owner and registration address. However, the accuracy of this information is dependent upon the vehicle owner filing accurate information with State Motor Vehicle.

Booting and Collections Incentive. *According to Amendment 1 to contract 15055DFPS between the city of Wilmington and Conduent State and Local Solutions, Inc. (F/KA Xerox State and Local Solutions, Inc.), signed on February 26, 2020, the city is offering the following to Conduent for parking citations processing and collection services, including booting vehicles in the city. We are curious to know how many other cities offer a 30% incentive to a company with the city-granted authority to immobilize a citizens' vehicle.*

The City does not know that answer.

Also, can the city provide any evidence that citizen's civil and constitutional rights are being properly observed?

Yes. A vehicle owners' civil and constitutional rights are of utmost importance to the City. Parking enforcement is an administrative or civil matter and is not a criminal violation. The ticket serves as an initial notice of violation, along with a secondary notice of violation that is sent to a vehicle owner via U.S. mail. Payment options are available. Those who dispute a citation are offered an administrative appeal process to rectify their concerns, and finally, a violation may be appealed to the state magistrate court. Throughout the civil appeal and court process, no additional penalties or interest accrue on the violation(s) being appealed. Under the current contract with City Tow, a vehicle owner is not charged a storage fee until the 5th day after a vehicle has been towed. Also, City Tow must observe all state statutory obligations to obtain legal title to a vehicle before it may be sold or salvaged.

Appeals Process. *Anecdotally, we have heard stories of drivers being denied the ability to take their case to the Justice of the Peace Court. Based on data from the city of Wilmington and the Courts, it would appear very few drivers are able to get their cases before a magistrate.*

Information obtained anecdotally may or may not be accurate. So, we will respond with facts. The City does not deny anyone the right to have their case heard in court. If a vehicle owner's

appeal has been denied by the Office of Civil Appeals, and the owner requests a court appearance, the City notifies the court. It is up to the court at that point, not the City, to set the court date and notify the vehicle owner. If there is proof, not anecdotal information, of a problem related to court appeals, we will review it. Please note that the Magistrate Court, like most judicial bodies, has been suspended due to COVID for about a year, so no cases sent by the City to the Court have been adjudicated during the pandemic.

It would appear that because the city has an office of civil appeals that, to the best of our knowledge, is not open to any kind of review, we do not currently have the ability to see if the law and the city's policies are being followed. Would the city be open to an outside review of the Office of Civil Appeals?

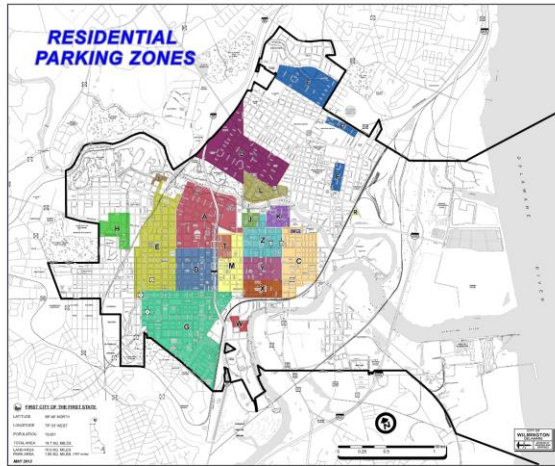
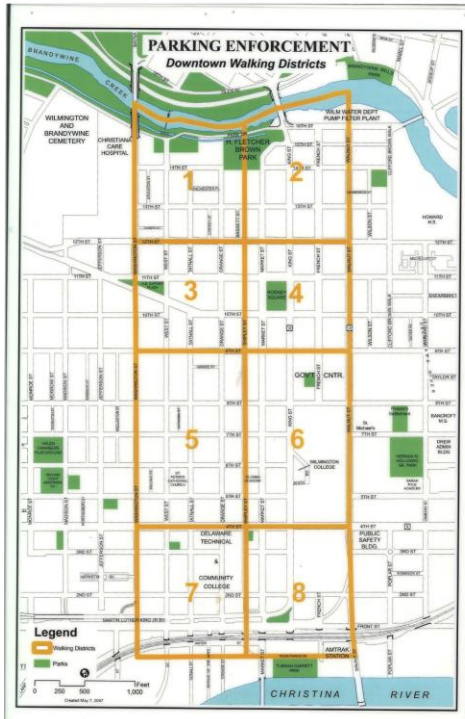
In fact, the Office of Civil Appeals is subject to review by the City Auditor. In addition, Civil Appeals records are available for review through the State Freedom of Information Act. I don't like this at all. (Based on the misuse of data and information by the coalition, the City will have to think more about whether it will agree to any type of review connected to this group.)

Coalition Email of April 26, 2021

The second correspondence from the coalition was received by the City on this date, and once again, suggests improper towing of vehicles, and supports a supposition regarding the amount of revenue that was earned by the City's towing vendor. City Towing does not report income from its salvage activities and, therefore, there is no basis to this claim. No facts were presented by the coalition in this email. Instead, it seemed to be an effort to cast additional doubts about the efficiency and integrity of the City's operations.

Coalition Email of April 30, 2021

The correspondence from the coalition sent on this date also uses incorrect data to draw false conclusions about what the coalition says is improperly issued tickets. This time though, the group not only used incorrect data, but also attached incorrect maps, which produced false information about parking enforcement. We have attached the correct maps here:



Here are responses to your claims.

“...we find in the attached spreadsheet at least 50 tickets (\$2,000) issued specifically for "Meter Overtime" in parts of the city that don't seem to fit in the category of Downtown Business District nor Riverfront. Can you clearly define what the city means by Downtown Business District? Would this map be a fair representation of that district? ” (NOTE: The Parking Coalition cited the Downtown Development District map in posing this question)

No, it is not. We do not use the Downtown Development District Map (which you cite) for this purpose. We have attached the correct map that we use for downtown enforcement (CBD Parking Enforcement Zones). This area is much smaller than the Downtown Development area. The area that we have been patrolling is in the central downtown area, which is bounded by Walnut Street at the Train station to 14th Street to Wilmington Hospital to Washington Street down to MLK Blvd back to the Train Station. Residential parking stickers are honored in these areas.

The Riverfront District ticketing is confined to the area from 200 to 400 Justison Street (Barclay’s Bank to Frawley Stadium). We have not been enforcing the residential blocks of the Riverfront, just the Kiosks and restaurant blocks on Justison.

Also, due to the construction and subsequent opening of 2000 Pennsylvania Ave, we have been enforcing limited time parking on the 100 block of Grant Avenue (Lexus dealership). The Lexus dealership has been parking unregistered vehicles on Grant Avenue in lieu of a lot. In addition, contractors were parking near Diver Chevrolet, impeding customers accessing the dealership. This additional enforcement is being done at the discretion of the Director.

Lastly, due to persistent complaints on the part of a local business owner, who owns a store on Union Street on the 700 Block of N. Union, we have been monitoring two, 15-minute parking spots. This is also being done at the discretion of the Director.

After the review of the list of 50 “questionable” tickets from the attachment you provided, all of them fit within the Parking Enforcement District in the CBD (our map) and therefore were issued properly.

“In the attached spreadsheet (provided by the City through FOIA), there are approximately 150 vehicles ticketed as “Abandoned” and more than 350 ticketed for parking near a fire hydrant. Yet out of that list of approximately 500 vehicles, fewer than 20 appear on either the list of 1,970 vehicles that were towed and reclaimed by their owners or the list of more than 1,300 that were towed and kept by the tow company.... what qualifies a vehicle to be towed - especially when the city says that towing has been suspended except for cases like abandoned vehicles and safety issues like parking in front of fire hydrants.”

There are many reasons why a vehicle may be towed. Most of the vehicles that are towed are abandoned vehicles. The City of Wilmington follows the City Code. I would recommend review of the City Code, Article III, Sec. 37-121 et al., which includes all provisions for the ticketing, immobilization and towing of vehicles. Vehicles that are parking in tow-away zones and areas impeding safety may receive a ticket and if not moved within 36 hours may be towed. Often, the vehicle will receive a ticket and the owner will pay it immediately. Therefore, they will not appear on the list.

Here is the link to the City Code:

https://library.municode.com/de/wilmington/codes/code_of_ordinances?nodeId=PTIIWICO_C H37MOVETR_ARTIIIVETOIMIM

Coalition Email of May 11, 2021

Your group’s fourth email uses the correct map but reaches an incorrect conclusion that “hundreds of tickets were issued incorrectly” outside of the Central Business District (CBD) and Riverfront District. Here is why.

There were 23,485 tickets issued between March 1, 2020 and March 30, 2021. See the chart below. Of this total, 10,451 tickets were issued for limited parking and meter overtime. There were NO tickets issued for limited parking and meter overtime during the pandemic period between March 24, 2020 and July 20, 2020 which is the date the City resumed ticketing in the Central Business District (CBD) and Riverfront.

Count of Ticket Number	
Violation Description	Total
20' CROSSWALK 37-223	438
ABANDOND VEH 37-131C	730
ABANDONED AND UNREG	1,418
ABANDONED VEH 37-121	797
BLOCKING FLOW 37-223	65
BUS/TAXI STOP 37-238	517
BUSES/CHARTER BUSES	4
COM&REC VEHICLE BOAT	7
DOUBLE PARKED 37-223	17
DRIVEWAY 37-223	90
FEEDING METER 37-265	1
FIRE HYDRANT 37-223	1,130
FIRE STATION 37-223	3
FIRE ZONE 37-231	10
FOR SALE STRT 37-236	1
HANDICAP ZONE 37-228	280
LEAVE VEHICLE 37-222	1
LIMITED TIME 37-225	4,635
LOADING ZONE 37-225	1,298
METER OVERTIME37-263	5,816
NO PARKING 37-225	2,863
NO STOPPING 37-224	654
NON EMERG REPR37-223	23
NOT METERED SP37-264	15
ON SIDEWALK 37-223	779
OVER SIZE VEH	44
OVERSIZED VEH 37-233	9
OVR 1FT CURB 37-221	29
SCHOOL BUSES	2
TAXICAB STAND 37-238	29
TOW AWAY ZONE 37-241	186
TOWED	738
WARNING	759
WRNG DIRECTION37-221	97
Grand Total	23,485

The following chart is a breakdown of limited time and meter overtime tickets issued from July 20, 2020 to March 30, 2021. There were 8,525 in total.

Count of Street Location	
Street Location	Total
10TH	694
11TH	383
12TH	117
13TH	29
14TH	23
3RD	124
4TH	16
5TH	53
6TH	174
7TH	45
8TH	60
9TH	686
BLOCK	1
DELAWARE	212
FRENCH	293
GRANT	127
JUSTISON	26
KING	711
LINCOLN	2
MADISON	1
MARKET	2632
ORANGE	249
RODNEY	1
ROSA	59
SENECA	1
SHIPLEY	861
STREET	4
TATNALL	634
UNION	2
W	2
WASHINGTON	133
WEST	138
Blank Location	32
Grand Total	8525

As can be seen from the chart, all tickets issued are within the CBD and Riverfront, with the exception of 127 tickets issued on Grant Avenue, two issued on Union Street and two issued on Lincoln Street. Enforcement was directed in these areas due to parking problems that needed immediate attention related to the Lexus and Chevrolet dealerships as explained earlier.

There were four tickets issued with an incorrect location listed by the parking enforcement officers. In the chart, these are designated as Seneca, Block and W. These tickets have been voided and the officers have been instructed to be more diligent in listing proper information in the data base. There were 32 other tickets issued with no location in the database, and these tickets have also been voided. Again, we have instructed the PREOS to properly list locations when issuing tickets. Of the 8,525 tickets issued, only 36 were determined to have been entered improperly (although not necessarily improperly issued) in the data base and were voided. This represents only .004% of the tickets issued. No reasonable person would suggest that this points to any type of widespread abuse of the ticketing process.

Closing Comment

In conclusion, members of the coalition could have come to the City to discuss the data received through FOIAs and other sources. Instead, the coalition chose to interpret the data on its own and did so incorrectly, reaching false and misleading conclusions. The information was unfortunately sent to the news media before it was shared with the City, further placing the coalition's intentions in question. City employees have been diverted for many hours from their normal duties in recent weeks to try and reconcile the data presented. We cannot get that time back. The City will do everything it can to improve parking enforcement service delivery but if the coalition's intent was, as was stated, to improve City parking enforcement, the effort failed. Inaccurate information, faulty conclusions and distorted accusations have done nothing to engender the public's confidence in a process that functions efficiently and fairly.