

FRAUD, WASTE, & ABUSE INVESTIGATIVE REPORT: LADOT RED ZONE PARKING TICKETS



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ALLEGATION

The Controller's Office Fraud, Waste and Abuse (FWA) Unit received an allegation that a Los Angeles Department of Transportation (LADOT) traffic officer working the night shift misused their authority and violated City policy by issuing fraudulent Red Curb No Stopping zone ("red zone") parking citations to vehicles parked on a specific street in Los Angeles.¹

BACKGROUND

LADOT oversees a range of transportation-related functions in Los Angeles, including parking enforcement and traffic control. LADOT traffic officers are deployed 24/7 and patrol the city in

¹ The identity of the subject employee shall be kept confidential in accordance with California Government Code §53087.6(e)(2).

shifts to address violations of parking laws outlined in the California Vehicle Code and Los Angeles Municipal Code. In addition, traffic officers respond to constituent complaints of parking violations and help ensure the safe and orderly movement of vehicles during special events.

According to the City's adopted budget for Fiscal Year (FY) 2024-25, LADOT's Parking Enforcement and Traffic Control (PETC) Division was funded for 689 positions that primarily consisted of traffic officers. In calendar year 2024, PETC officers issued over 1.5 million citations generating revenue of \$118 million, which included 246,551 red zone citations that generated approximately \$22.9 million in revenue.

The cost of parking tickets can be a financial burden on many residents. **It is essential that PETC's singular focus is on holding violators accountable and deterring motorists from violating established regulations and policies—not generating revenue for the City.** LADOT has controls and processes in place that are intended to ensure that its enforcement authority is consistently and fairly applied within State law, local regulations, and departmental policy.

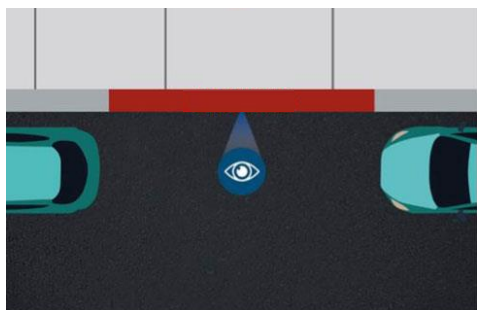
- Professional Standards Group (PSG) is LADOT's internal group that investigates allegations and complaints of traffic officer misconduct. PSG's investigative findings and disciplinary recommendations are sent to the City's Personnel Department for final review and to administer disciplinary action.
- LADOT's Parking Operations and Support Division is responsible for processing parking citations that are contested by motorists. The first step in this process is known as an "Initial Review" and is intended to determine whether the contested citation is valid under parking regulations. Requests for an Initial Review must be made within 21 days from the date the citation was issued or 14 calendar days from the first overdue notice.

Upon receiving the allegation, the FWA Unit conducted an initial evaluation to determine whether there was sufficient evidence to warrant further investigation. **We are issuing this public report to summarize the results of this investigation and alert motorists who believe they may have received improper parking citations from LADOT traffic officers.**

Regulations and Policies Related to Red Zones and Issuance of Citations

Red colored curbs designate a location as a "No Stopping" zone (commonly referred to as a "red zone") in which no vehicle or portion of a vehicle is permitted to stop, park, or stand. LADOT can designate a no stopping or parking zone when it is determined to constitute a hazard or an obstruction for vehicles or pedestrians. Red curb traffic control measures can also

provide for unobstructed access and aid in pedestrian safety by allowing motorists more visibility to see pedestrians entering the roadway and crosswalks from a safe stopping distance.



This image shows a red painted curb which indicates it is a designated red zone. A vehicle cited at this location would be issued a \$93 red zone citation.

Red zones are enforced at all times, unless posted signs indicate otherwise. Official signs using colors and legends may be posted by the LADOT in lieu of painting the curb. Red zone violations are issued as a violation under Los Angeles Municipal Code 80.56(e)(4) and are accompanied by an initial \$93 parking fine. The fine is increased to \$186 for a late payment penalty if payment is received after 14 days and is further increased to \$211 if payment is received more than 58 days from the date of issuance.²

We consulted the following traffic regulations and LADOT policies for our investigation:

- California Vehicle Code (CVC) Section 21458(a), specifies red zones for local parking regulations indicated by painted upon curbs require the curb color to be red.
- Los Angeles Municipal Code (LAMC) Chapter VIII Traffic, Section 80 details the city's traffic regulations:
 - LAMC 80.56(f), "Markings for Zones", states, "'No Stopping' Zones when designated by painted curbs shall be RED."
 - LAMC 80.10, "Signs Required", provides that marked parking restrictions are not enforceable if "at the time and place of the alleged violation, an official sign or marking is not in place and sufficiently legible and visible to be seen by an ordinary observant person."
- LADOT's Traffic Officer Training Manual Chapter 6 details the traffic officer's guidelines for issuing citations:
 - Chapter 6/101.1, "Parking Citations" - Specifies a parking violation should only be cited when a vehicle is in violation of any LAMC section or Vehicle Code and that a citation shall not be issued if "at the time of a violation, any required

² According to LADOT, the City is engaged in pending litigation. Beginning in February 2022, the department suspended towing of "scofflaw" impounds, which is a vehicle with five or more unpaid traffic citations in accordance with CVC 22651(i). An impound may still occur if the vehicle is in violation of another statute such as an imminent traffic hazard or a threat to public safety.

official sign or marking is not in place and sufficiently legible and visible to be seen by any ordinary observant person.”

- Chapter 6/101.18, “Location” - Details when citing for a parking violation, the written location of the violation should be as accurate as possible; if there is no address available, do not fabricate one. Officers can write the address adjacent to the vehicle in question by writing the abbreviation “OPP” for “opposite” or can use the block number by writing “APPROX” for “approximate.”³
- Initial Review Business Processing Rules (BPR) Section 3 “Critical Fields” and Section 40 “Complaint Investigations Paint” - These sections detail the department’s initial review procedures for evaluating citations contested for errors in a required field and for claims that paint is not visible, faded, or not painted by the City.

A parking citation includes the parking code violation, the date and time of the violation, the location where the violation occurred, vehicle information, traffic officer information, and the fine amount. Red zone violations require traffic officers to take a photo of the vehicle in relation to the curb or sign in accordance with departmental policies, however the photos are not provided to the motorist along with the citation.⁴

INVESTIGATION RESULTS SUMMARY

The FWA investigation found that the Traffic Officer improperly issued 163 citations outside of departmental policies for \$93 red zone LAMC 80.56(e)(4) violations from March 2020 through December 2022. **Pursuant to FWA’s findings, LADOT has canceled and refunded the 163 citations for a total recovery amount of \$22,571 for motorists.**



163

**Red Zone Citations Found
to be Unenforceable**



\$22,571

**Total Amount Recovered through
Refunds/Canceled Citations**

³ Another acceptable abbreviation is “BLK” for “block” which is not specified in the Traffic Officer Manual.

⁴ According to LADOT, photos are not required for a valid citation. However, that stance contradicts the department’s policy on requiring a photograph be taken by the traffic officer. There may be instances when a photograph is not able to be taken such as due to equipment failure or hazardous conditions.

The 163 improperly issued tickets fell into the following categories:

The Traffic Officer issued **58** red zone citations where the vehicle was not in violation of LAMC 80.56(e)(4) due to the curb not being sufficiently and visibly colored red. These citations were issued to vehicles parked at curbs where the red paint was either indistinct, faded, or defaced by being painted over, making it unclear if the curb was in fact designated as a red zone. According to the LAMC, red zone violations should not be issued if the curb marking or paint is not "sufficiently legible and visible."



58

The Traffic Officer was also found to have improperly issued **101** red zone citations by citing violation locations that were not in accordance with departmental policies and procedures. Of those, 69 citations were cited for a completely different street than where the violation was alleged to have occurred. According to LADOT's policies, when citing for a parking violation the written location of the violation should be as accurate as possible; if there is no address available, do not fabricate one.



101

Three of these improperly issued citations had been previously contested and upheld through LADOT's Initial Review appeal process, but were found through this investigation to be unenforceable. Of those, two citations were found to have been improperly cited for a vehicle parked in a red zone that was not clearly marked by a red curb.



3

During the course of our investigation, we identified potential issues with the Initial Review process. Chief among those issues is that the Initial Review process made improper determinations when evaluating whether a contested citation should be ruled in favor of the department. Additionally, staffing shortages have led to a significant backlog of curb paint and sign maintenance requests. Therefore, faded or defaced curbs are not being quickly restored to their intended condition and leave an opportunity for reasonable disagreement over whether a curb's paint is clearly visible or not.

We recommend that LADOT improve its oversight of its parking enforcement and operations activities by:

- implementing audits of citations to test whether they were issued in accordance with departmental policy standards;

- assessing the Initial Review process and conduct audits to determine whether the findings were properly evaluated and supported;
- developing and monitoring metrics to identify outliers of contested citation data for additional review; and
- providing an accessible database of curb maintenance requests for traffic officers.

It is important to note that this investigation focused on allegations about a single traffic officer. Questions remain about the overall impartiality of the appeals process and the extent to which other traffic officers may have engaged in similar conduct. **Our Office will continue to monitor parking enforcement and will conduct a citywide audit if LADOT does not take steps to correct the deficiencies identified in this investigation.**

LADOT's Professional Standards Group Investigation

In December 2022, a motorist submitted a complaint to PSG to appeal a red zone citation they believed was improperly issued. The motorist asserted that the paint was faded, making it not clearly visible that the curb was red when they parked there at night. PSG traced the citation to the assigned Traffic Officer (the subject of our investigation) and generated a report that listed all citations issued by that Traffic Officer at that same contested curb location within the last year.



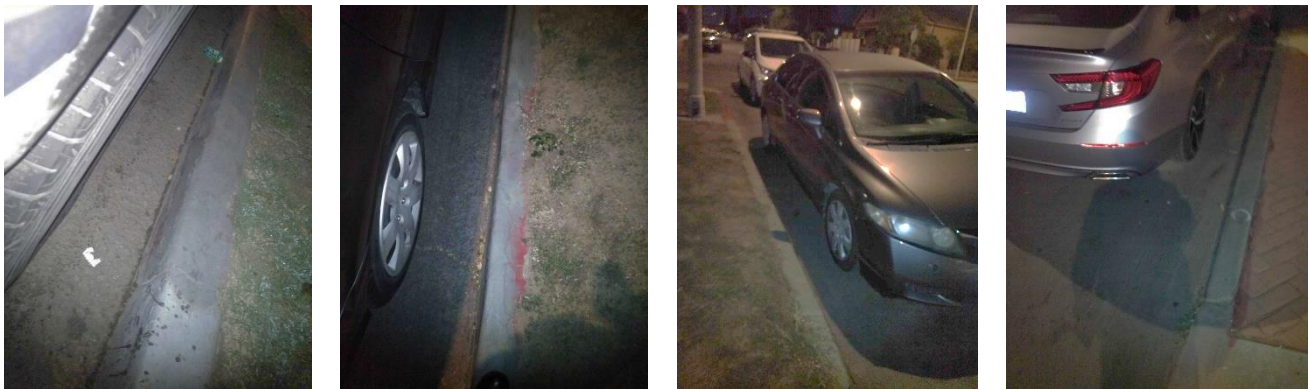
Officer's photos of the front and rear of the vehicle cited for a red zone violation that was later contested by the motorist for the curb not being painted red.

The report showed the issuance of numerous citations at the location and that the actual recorded address was incorrect. In addition, PSG researched the recorded location's red zone curb and found that it was previously covered or painted over for approximately three months, thereby supporting the motorist's complaint that the curb was not clearly red in color when the Traffic Officer issued the citation. Based on these preliminary indicators, PSG was assigned to investigate the Traffic Officer for the issuance of multiple citations at this address.

PSG Found that 22 Red Zone Citations Issued by the Traffic Officer were Unenforceable

PSG's investigation included citations issued at the contested address from February 10, 2021 through November 27, 2022. **PSG found that the Traffic Officer issued 22 citations outside of departmental policy during this time period. Based on a review of photographs, the red curb at the contested location was defaced and painted gray on the dates and times the citations were issued making them unenforceable. In addition, the location of the issuance for some citations was incorrectly recorded making them unenforceable.**

**Figure 1. Examples of the Traffic Officer's Photos of Four Red Zone Citations
Dismissed by PSG for Not Showing Evidence of a Red Zone Violation**



In July 2023, PSG interviewed the accused Traffic Officer. This four-year veteran traffic officer attributed the improperly issued citations to a lack of training and understanding despite acknowledging being provided with the necessary materials. The traffic officer explained that the red zone citations were issued to vehicles with faded or defaced curbs because it was believed to be in accordance with policies that the red zones are to be enforced at all times—regardless of curb condition.

A PSG investigative report was completed and submitted to the Personnel Department to administer appropriate disciplinary action for the Traffic Officer's issuance of citations outside of departmental policies and procedures. The Traffic Officer was issued a Notice to Correct Deficiencies, which is a written notice to document the department's standards and requirements, what is expected in the future, and the possible consequences if the behavior in question is not corrected. The 22 red zone citations were dismissed and refunds were processed to the registered owners of the ticketed vehicles.

Controller's Fraud, Waste and Abuse Unit Investigation

In August 2023, the FWA Unit initiated an investigation into these allegations and was unaware that PSG had substantially completed their own similar investigation into this same Traffic Officer. We met with PSG and reviewed their records and scope for their investigation. The scope of our investigation covered a longer time period (from the date the officer was initially assigned to the division through the date the officer was transferred to a different assignment) and included citations issued for all locations (not just the contested location described above) by this Traffic Officer.

We continued with our investigation to determine whether the Traffic Officer improperly issued additional citations that should be dismissed and to provide any recommendations to enhance the department's oversight of traffic officers' parking enforcement compliance with departmental policies.

FWA Identified an Additional 141 Unenforceable Citations (95% of the sample population) Issued by the Traffic Officer

Traffic officers use a handheld device to issue citations and can also submit outage requests in the field for issues such as curb repainting, damaged signs, etc. We conducted a targeted sample of red zone citations issued by the Traffic Officer for locations in which they also submitted a red curb outage request for repainting. Our sampled population focused on locations where the Traffic Officer self-reported that the red curb needed repainting, and therefore citations would not be expected to be issued for these locations as they would likely not meet the criteria of being sufficiently legible and visible.

In total we sampled 148 citations, and found that 141 citations (95% of those sampled) were unenforceable.

- 43 of the 148 sampled citations (or 29%) were issued for red zones where the curb was not colored red, which made the citation unenforceable as the vehicle was not in violation of LAMC 80.56(e)(4).
- 94 of the 148 sampled citations (or 64%) had the location field incorrectly recorded for either the incorrect street, block, or side, which makes the citation unenforceable as the citation was improperly issued by not accurately reporting the cited location in violation of LADOT's policies.⁵

⁵ LADOT Traffic Officer Training Manual - Chapter 6/101.18: "Location"

The detailed breakdown by findings category is presented in Table 1.

Table 1 - FWA Unit Findings from Sampled Red Zone Citations

Findings Category	Total Count	Gross Citation Revenue
Unenforceable - Curb Not Colored Red	43	\$3,999
Unenforceable - Curb Red; Cited Location is on the Incorrect Street	62	\$5,766
Unenforceable - Curb Red; Cited Location is on the Incorrect Block Number or Side (Odd vs. Even)	32	\$2,976
Unenforceable - Curb Red; Incorrect Violation	4	\$372
Total Unenforceable	141	\$13,113
Enforceable - Curb Red; Cited Location is Correctly Reported	7	\$651
Total Enforceable	7	\$651

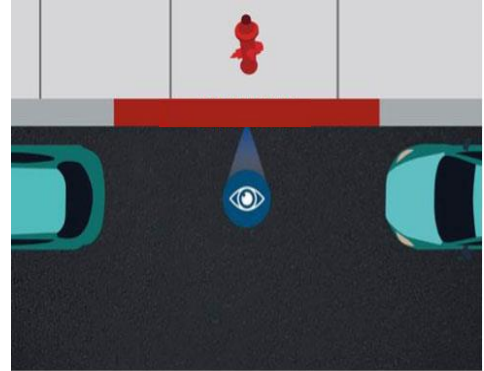
For each sampled citation, we received:

- the image taken by the Traffic Officer using the handheld device;
- date/time stamps automatically generated at the time of the citation; and
- vehicle information/location that was manually entered into the handheld device by the Traffic Officer.

We conducted the same evaluation that PSG conducted for their investigation by performing the following procedures:

- For a citation to be enforceable for a red zone violation, the curb color must be red and be sufficiently legible and visible. The location recorded on the citation must be accurate within reason and written in accordance with departmental policies. Citations not meeting either of these criteria were determined to be unenforceable.
- We reviewed the handheld image to determine whether the red zone curb marking was sufficiently legible and visible. Handheld images that did not show a red colored curb that was clearly identifiable were categorized as "Unenforceable - Curb Not Colored Red".
- We researched the remaining citations with a red colored curb to confirm if the recorded location was accurate and in accordance with departmental policies. Citations that did not accurately report the violation location were found to be unenforceable and grouped into the following categories:
 - Cited Location is on the Incorrect Street - For example, the citation listed "Main St." and we found that the actual location was on "First St."

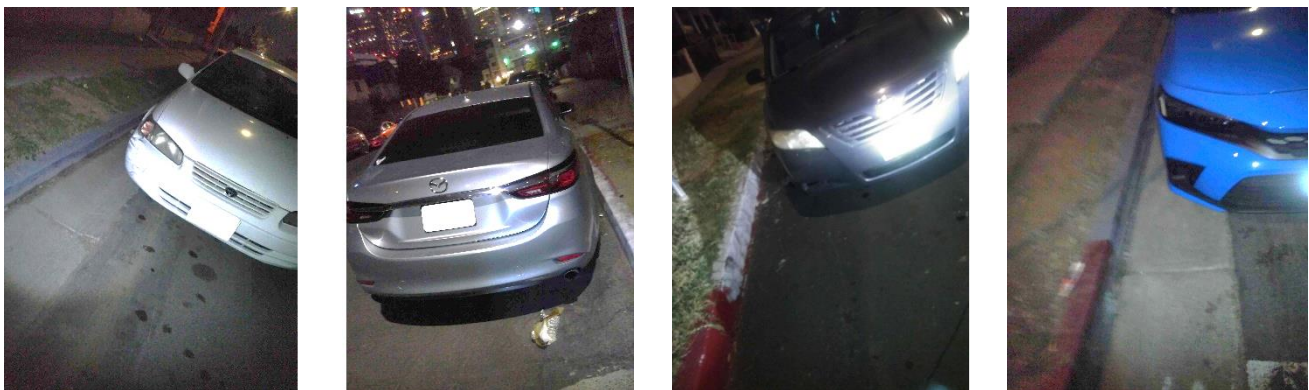
- Cited Location is on the Incorrect Block Number or Side (Odd vs. Even) - For example, if the citation listed "100 Main St." we found that the actual location was on "200 Main St." Citations were also written for the incorrect side of the street, such as for the odd numbered side instead of the even numbered side.
- There were four citations issued by the Traffic Officer for a red zone violation and the handheld image showed a red colored curb, however the cited vehicles were parked in front of a fire hydrant. In consulting with PSG, we learned that these four citations should have been issued for a \$68 fire hydrant violation instead of a \$93 red zone violation. PSG determined that these citations for the incorrect violation would be unenforceable in accordance with their policies.



This image shows a red painted curb with a fire hydrant. A vehicle cited at this location should be issued a \$68 fire hydrant citation instead of a \$93 red zone citation.

Our initial findings were shared with LADOT's PETC for their review and final determination on whether the citations we identified should be dismissed. PETC submitted the 141 citations for cancellation and refund. As a result of our findings, PETC reissued training bulletins to all enforcement staff on the proper procedures for recording addresses and paint/sign outages.

Figure 2. Examples of the Traffic Officer's Photos of Four Red Zone Citations Identified by FWA's Findings and Dismissed by LADOT for Not Showing Evidence of a Red Zone Violation



Concerns about Improper Evaluations Conducted by LADOT's Initial Review Process

Parking citations can be contested following a three-tier process that begins with an Initial Review, followed by an Administrative Hearing, and finally, an appeal of the decision at Superior Court.⁶ PSG's investigation found that 22 citations issued by the Traffic Officer were unenforceable and ultimately dismissed. **Three of the 22 unenforceable citations were previously contested through LADOT's Initial Review process and were not dismissed prior to PSG's investigation and findings.** As a result, we sought to better understand the overall Initial Review process and findings related to these three contested citations given that they were ultimately dismissed as unenforceable.

The Initial Review process relies upon the citation's issuance as *prima facie* evidence that the violation occurred, consistent with CVC Section 40202(a). The burden is then placed on the registered owner to provide evidence that is strong enough to rebut the presumption that the violation occurred. If during the Initial Review conducted by LADOT, the registered owner provides evidence strong enough to clear that threshold, then the citation is dismissed. If not, then the citation is upheld as "valid". LADOT sends written notification regarding the outcome.

We obtained the contested citation records for these three citations from LADOT, which were all issued for the same location denoted for our report as "Location A". The Initial Review's determination letter sent to each registered owner included the following language about the outcome: "the review concluded that your vehicle was parked in a red zone that was clearly marked by a red curb." Table 2 lists the citations and the Initial Review's findings alongside PSG's findings for the same citations.

Table 2 - LADOT Initial Review and PSG's Findings on Contested Citations

Citation Number	Citation Location	Citation Date	Contested Date	Initial Review Findings Summary	PSG Investigation's Findings Summary
1	Location A	10/7/2022	10/14/2022	Valid Ticket - Curb Red	Dismissed - Curb Not Red
2	Location A	10/16/2022	10/21/2022	Valid Ticket - Curb Red	Dismissed - Curb Not Red
3	Location A	10/16/2022	10/24/2022	Valid Ticket - Curb Red	Dismissed - Curb Red; Location is on the Incorrect Block #

We found that for two citations, the Initial Review's determination that the curb was **Red** contradicted FWA's and PSG's investigation findings that the curb was **Not Red**. We met with the Initial Review division to understand their process for reviewing these citations.

⁶ LADOT's website contains the detailed steps for contesting a citation and can be accessed at <https://ladotparking.org/adjudication-division/contest-a-parking-citation/>.

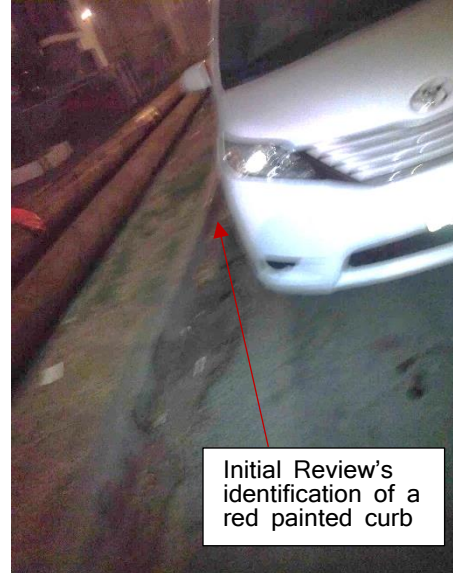
Contested Citation #1

- The motorist contested that the curb was painted over and looked gray. The motorist provided a daytime photo of the vehicle showing a gray curb where the vehicle was parked.
- LADOT's Initial Review process for this red zone citation was conducted using the officer's handheld photo and brightening that photo to lighten the image. That brightened photo purportedly showed a red colored curb at the rear where the vehicle was parked. Based on those findings, the citation was ruled "Valid".
- We duplicated that same effort by brightening the photo, however we could not definitively identify a red curb that would meet the LAMC criteria of being "sufficiently legible and visible". There was a variation between the curb color near the vehicle's front bumper compared to the rear, but we were unable to determine that color was in fact red. The original photo and the brightened photo are shown below.
- PSG's investigation found that for this same citation, **the curb was not red and the citation was ultimately dismissed.**

Officer's Photo



Officer's Photo Brightened



Contested Citation #2

- The motorist contested that the curb was gray and not red. The motorist provided a well-lit photo of the location where the motorcycle was parked showing a gray curb.
- LADOT's Initial Review process for this red zone citation was conducted using the officer's handheld photo, which showed red paint along the top of the curb. Based on those findings, the citation was ruled "Valid".
- We analyzed the officer's photo and observed a thin red painted line along the sidewalk abutting the curb, but not on the curb itself. As a result, we did not identify a red curb that would meet the LAMC criteria of being "sufficiently legible and visible".
- PSG's investigation found that for this same citation, **the curb was not red and the citation was ultimately dismissed.**

Officer's Photos

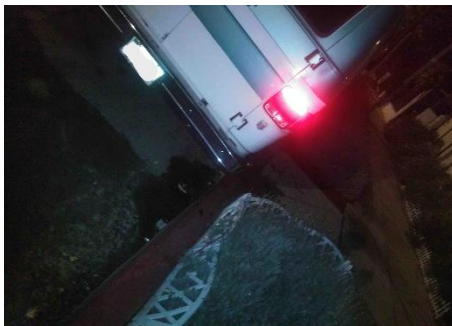


For contested citations #1 and #2 above, the Traffic Officer issued red zone citations for curbs that were not red. Yet, LADOT's Initial Review's findings upheld that the curbs were red and the citations were deemed to be "Valid". **This inconsistency indicates that there is disconnect between what the Initial Review process can use to justify their findings compared to what a reasonable person would determine when presented with the same evidence. Further, the Initial Review's approach to uphold a red-colored curb contradicts the training given to officers for issuing a red zone violation; if the red curb paint is not "sufficiently legible and visible", then a citation should not be issued.**

Contested Citation #3

- The motorist contested that the vehicle was parked in the red zone since only the vehicle's bumper and not the tires were in the red paint. The motorist provided a daytime photo of the vehicle at the location with the vehicle's bumper in the red zone.
- LADOT's Initial Review process for this red zone citation was conducted using the officer's handheld photo, which showed a red curb. No portion of a vehicle can park in a red zone including bumpers. Based on those findings, the citation was ruled "Valid".
- We brightened the photo and observed that the curb was clearly painted red. As a result, we found that this curb met the LAMC criteria of being "sufficiently legible and visible". However, we searched the cited location and found it was inaccurately reported.
- PSG's investigation found that for this same citation the curb was red. However, the **recorded location of the citation was an incorrect block number on the correct street which is not in accordance with department policy. Therefore, the citation was ultimately dismissed.**

Officer's Photo



Officer's Photo Brightened



For Contested Citation #3, the vehicle was parked at a red curb as determined by the Initial Review and PSG, but the citation was ultimately dismissed by PSG for the recorded location being inaccurately reported on the citation. A motorist may contest any portion of the ticket including the location, but the contested citation did not list the incorrect location as a contested reason.

We also found that these three citations issued by the Traffic Officer for Location A were contested within ten days of one another. **The department does not currently have a process in place to identify and review patterns of contested citations by traffic officers.**

Our investigation into this Traffic Officer's citations also revealed serious concerns with the Initial Review process. Based on our examination, **the Initial Review process appeared to not properly evaluate three citations. Specifically, the Initial Review ruled that there was a clearly marked red curb in two instances where the Traffic Officer's photo clearly did not show a red curb. This practice puts motorists at a disadvantage when contesting a citation, leaving them to continue with the three-tier process costing them time and money to contest a citation that may have been improperly issued in the first place.** In 2024, only 293 or 3% of red zone citations were appealed to an Administrative Hearing after being found Valid by Initial Review. Of those appealed, 41 or 14% were found to be not liable.

Table 3 - Findings of Red Zone Citations Contested and Appealed in 2024⁷

Citations Contested to Initial Review		Citations Appealed to Administrative Hearing	
Initial Review Findings	Total Count	Administrative Hearing Findings	Total Count
Valid	9,882	Liable	252
Dismissed	1,941	Not Liable	41
Total Contested	11,823	Total Appealed	293

LADOT's Curb Paint and Sign Maintenance Backlog

One key area that requires immediate attention for LADOT is the backlog of curb paint and sign maintenance. During the course of our investigation, we learned that LADOT faces the threat of residents and businesses painting curbs red or gray in order to control parking in their vicinity. So, in addition to normal fading of red curbs, the department has to contend with residents and businesses defacing or painting over red curbs to allow for nearby parking. Similarly, there are also some residents and businesses painting curbs red to prevent unwanted parking. Both of these scenarios complicate the citation issuance process. **It is critical that faded and defaced curbs are efficiently restored to their intended state.**

LADOT's Paint & Sign Division oversees the maintenance of traffic signs, pavement striping, and curb markings among other types of routine maintenance. Faded or defaced curb zone maintenance requests can be submitted to the department through the City's 311 website/call center or by traffic officers submitting a request on their handheld device. The division is tasked with managing new requests, conducting review and field inspections to verify if the maintenance request is warranted, and completing work orders. In 2024, the division received

⁷ The citations received an Initial Review and/or Administrative Hearing in calendar year 2024, but may have been issued in prior years.

over 3,700 curb zone maintenance work orders and the average time to completion ranged from three to four months depending on the assigned service yard's staffing levels.

The department relied on one employee to review and distribute outage requests to the proper service yard for correction. This employee was out on leave since early 2023 and later retired and the position remained unfilled, leading to a backlog of outage requests.

RECOMMENDATIONS

To strengthen oversight and address the issues identified in this investigation, LADOT's Parking Enforcement and Traffic Control Division should:

1. Conduct risk-based audits of parking citations to test whether they were issued in accordance with departmental policy standards. Citations that do not meet the department's standards should be considered for cancellation and additional training should be provided to the traffic officer.
2. Determine whether the Initial Review's process is consistent with best practices and conduct periodic audits to determine whether motorists' evidence and Initial Review's findings were fairly evaluated and properly supported in accordance with department policy standards.
3. Develop and monitor early warning indicators/metrics (e.g., high percentage of contested citations by traffic officers and/or by location) to identify outliers of contested citation data for additional review.
4. Provide an accessible database of the verified curb maintenance requests that can be communicated to each district and status changes (newly added and completed) covered during each shift's roll call meeting with traffic officers.

LADOT Response

The Controller's FWA Unit provided LADOT with a draft of this investigative report and their feedback was considered as the report was finalized. LADOT was also provided with an opportunity to submit a formal response to the investigative report. The department agreed with all four recommendations and provided target implementation dates.

Rec. #	Status	LADOT Implementation Plan	Date
1	Agree	“Traffic Officers that have a high error rate or self-voided citations are flagged for further analysis and counseling. When LADOT is made aware of citations issued in error during the administrative appeal process, the Department will cancel those citations. LADOT will work with Trellint to develop a randomized process to identify officers for a performance audit.”	12/2025
2	Agree	“LADOT currently has an Initial Review quality assurance group that is short-staffed due to vacancies. LADOT will continue to pursue having these vacant positions filled, when authorized.”	09/2026 (contingent on hiring in FY 26-27)
3	Agree	“LADOT established a system with Trellint that actively tracks performance and provides a recurring report of Traffic Officer activity. This system identifies Traffic Officers that have a high error rate or exceeding self-voided citations. Identified officers are counseled and provided training as needed to improve their performance. The Department will work with Trellint to expand this monitoring to provide alerts for officers with a high rate of contested citations and/or locations that reveal a pattern of citation issuance that exceeds the expected norms.”	12/2025
4	Agree	“LADOT proposes using the My311 system to track and report status of the request. LADOT to further investigate the logistics of this solution.”	12/2025

FRAUD, WASTE, AND ABUSE UNIT

The Office of the Controller was created by the Los Angeles City Charter as an independent office, and is headed by the Controller: the elected auditor, paymaster, and chief accounting officer for the City of Los Angeles. The Office’s Fraud, Waste, and Abuse Unit was established

to identify and stop losses of City resources and to act as a deterrent to fraud, waste, and abuse in City government.

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