

**SETTLEMENT AGREEMENT
BETWEEN THE UNITED STATES OF AMERICA
AND THE BOARD OF ELECTION COMMISSIONERS FOR THE CITY OF ST. LOUIS
DJ No. 204-42-155**

This settlement agreement (the “Agreement”) is entered into between the United States of America and the Board of Election Commissioners for the City of St. Louis (collectively, the “Parties”).

INTRODUCTION

1. The United States conducted an investigation of the Board of Election Commissioners for the City of St. Louis (“the Board”) under Title II of the Americans with Disabilities Act of 1990, as amended (“Title II” and “ADA”), 42 U.S.C. §§ 12131-12134, and Title II’s implementing regulation, 28 C.F.R. Part 35.
2. The Board has over 220 precincts, currently housed in over 100 polling place locations, including buildings that are privately- or publicly-owned. The Board is responsible for reviewing the accessibility of each polling place and selecting each polling place.
3. During the April 2, 2019 election, the United States surveyed 39 of the Board’s 111 polling places used during the election. The United States observed that all of the 39 polling places surveyed contained at least one or more architectural barrier, such as stairs, excessively sloped parking areas, narrow doorways, steep ramps, protruding objects, and inaccessible doorknobs, that rendered the facilities inaccessible to voters with disabilities. Of these polling places, 14 locations were publicly-owned buildings.
4. The Department also substantiated complaints alleging that in some instances (1) the Board’s polling places contain architectural barriers that render the facilities inaccessible to voters with disabilities; (2) the Board fails to provide accessible curbside voting; (3) the Board fails to provide voters with disabilities the same amount of privacy and independence while voting as voters without disabilities; (4) the Board’s designated accessible voting machines lack adequate maneuvering space and reach ranges for voters with disabilities; and (5) the Board failed to provide auxiliary aids and services, including headphones, to ensure that the accessibility features of the designated accessible voting machines were functioning on Election Day.
5. The Board denies the United States’ allegations and does not admit, concede, or otherwise acknowledge that it has violated the ADA.
6. Individuals with mobility impairments have disabilities within the meaning of the ADA where those impairments substantially limit one or more major life activities of such individuals, including walking. Individuals with vision impairments have disabilities within the meaning of the ADA where those impairments substantially limit one or more major life activities of such individuals, including seeing. 42 U.S.C. § 12102(2).
7. The Board is a public entity within the meaning of the ADA, 42 U.S.C.

§ 12131(1), and 28 C.F.R. § 35.104, and is therefore subject to Title II and its implementing regulation.

8. The term “the Board,” as used in this Agreement, shall include the Board and all of its members, officers, employees, contractors, successors, assigns, and administrative personnel; and any other person under the authority or control of the Board.

9. The Board operates services, programs, and activities within the meaning of Title II, including operating a voting program for federal, state, and local elections for which it selects and uses sites as polling places.

10. The Attorney General is responsible for administering and enforcing Title II of the ADA, 42 U.S.C. §§ 12131-12134, and its implementing regulation, 28 C.F.R. Part 35. The Department is authorized, under 28 C.F.R. Part 35, Subpart F, to investigate the allegations in this matter, to issue findings, and to negotiate and secure voluntary compliance agreements. Furthermore, the Attorney General is authorized, under 42 U.S.C. § 12133, to bring a civil action to enforce Title II of the ADA.

11. The Parties agree that it is in their mutual interest, and the United States believes that it is in the public interest, to resolve this investigation on mutually agreeable terms without litigation. In consideration of the mutual promises contained in this Agreement, good and valuable consideration, the receipt and sufficiency of which is acknowledged, and to avoid the costs, expenses, and uncertainty of protracted litigation, the Parties, intending to be legally bound, enter into this Agreement.

TERMS OF SETTLEMENT

I. Definitions

12. “Election” or “Election Day” shall include all elections operated by the Board, including primary and general elections.

13. “Accessible on Election Day” means that a polling place is compliant with the 2010 ADA Standards for Accessible Design (“2010 Standards”) (28 C.F.R. § 35.104, as set forth in appendices B and D to 36 C.F.R. Part 1191 and the requirements contained in 28 C.F.R. § 35.151) on Election Day, whether such compliance is achieved through permanent architectural measures or through the use of temporary measures such as those provided for in Paragraph 21 below.

14. “Election Day Surveyors” or “EDSs” are Board personnel who will review compliance at polling place locations where temporary measures are to be implemented on Election Day.

15. “Effective Date” of this Agreement is the date of the last signature below. Unless otherwise specified, all time periods designated for an action run from the Effective Date.

II. Obligations of the Board

A. Accessible Voting Program

16. The Board will take all reasonable and necessary steps to effectuate its obligation to comply with the ADA with respect to its voting program and this Agreement. In particular, the Board shall revise all relevant policies, practices, and procedures to meet the following obligations:

- a. The Board shall not exclude qualified individuals with disabilities from participation in or deny them the benefits of its voting program, or subject them to discrimination, on the basis of disability. 42 U.S.C. § 12132; 28 C.F.R. §§ 35.130(a), 35.149.
- b. The Board shall maintain in operable working condition those features of facilities and equipment that are required by the ADA to be readily accessible to and usable by persons with disabilities. 28 C.F.R. § 35.133.
- c. The Board shall administer its voting program in the most integrated setting appropriate to the needs of persons with disabilities. *Id.* § 35.130(d).
- d. The Board shall afford voters with disabilities the same amount of privacy and independence provided to voters without disabilities. *Id.* § 35.130(b)(1)(ii).
- e. The Board shall take appropriate steps to ensure that communications with voters, applicants, members of the public, and companions with disabilities are as effective as communications with others. *Id.* § 35.160(a)(1).
- f. The Board shall furnish appropriate auxiliary aids and services where necessary to afford individuals with disabilities, including voters, applicants, companions, and members of the public, an equal opportunity to participate in, and enjoy the benefits of the voting program. Such auxiliary aids and services must be provided in accessible formats, in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability. *Id.* § 35.160(b).
- g. Within ninety (90) days of the Effective Date of this Agreement, the Board shall submit its revised policies, practices, and procedures to the United States for review and approval. Within ten (10) days of receiving comments from the United States, the Board shall incorporate in its policies, practices, and procedures any additions or modifications proposed by the United States that bring the Board's policies, practices, and procedures into compliance with the ADA.

17. The Board shall provide accessible polling places in order to have an accessible voting program, including a program that is accessible to persons with mobility or vision disabilities. 42 U.S.C. § 12132; 28 C.F.R. §§ 35.130, 35.149. The Board shall select facilities to be used as polling places that do not exclude qualified individuals with disabilities from or deny them the benefits of the polling place, or otherwise subject them to discrimination. 42 U.S.C. § 12132; 28 C.F.R. § 35.130(b)(4).

18. For all elections occurring after the Effective Date of this Agreement, the Board will implement measures to remediate the issues identified in Attachment A, to make those polling place locations Accessible on Election Day, or will relocate those locations not remediated to an alternative accessible location pursuant to the process established in Paragraphs 24 and 26 of this Agreement. The Board will provide its remediation plan to the United States within ninety (90) days of the Effective Date of this Agreement. If the Board asserts, and the United States agrees, that remediation and relocation to an accessible polling place location are infeasible, then the Board shall comply with Title II's program accessibility requirements as described in Paragraph 20 of this Agreement. 28 C.F.R. § 35.150.

19. For all facilities not owned by the Board, the Board shall maintain in operable working condition on Election Day those features of facilities and equipment owned by the Board (including temporary equipment such as portable ramps, traffic cones, signs, wedges, and door stops) that are required to make polling places Accessible on Election Day. 28 C.F.R. § 35.133(a). If circumstances arise such that a polling place location not owned by the Board that was previously accessible is no longer accessible because a feature of the polling place location or equipment owned by the Board is no longer operable, then the Board shall either purchase new temporary equipment or the Board will relocate the polling place to an alternative, accessible location pursuant to the process established in Paragraphs 24 and 26 of this Agreement. If the Board asserts, and the United States agrees, that remediation and relocation to an accessible polling place location are infeasible, then the Board shall comply with Title II's program accessibility requirements as described in Paragraph 20 of this Agreement.

20. If the Board asserts, and the United States agrees, that remediation and relocation to an accessible polling place location are infeasible, then the Board shall comply with Title II's program accessibility requirements, see 28 C.F.R. Part 35, Subpart D, and provide absentee voting and effective curbside voting. Effective curbside voting includes: (1) signage outside of the location informing voters of the availability of curbside voting, the location of the curbside voting, and how voters can notify the official that they are waiting curbside; (2) a curbside voting location that allows the curbside voter to obtain information from candidates and others campaigning outside the polling place; (3) a method for the voter with a disability to announce her arrival at the curbside voting location without requiring the voter to bring a companion or get assistance from another voter (e.g., a temporary doorbell or buzzer system at the curbside voting location would be sufficient, but not a telephone system requiring the use of a cell phone or a call-ahead notification); (4) a prompt response from election officials to acknowledge their awareness of the voter; (5) timely delivery of the same information that is provided to voters inside the polling place; and (6) a portable voting system that is accessible and allows the voter to cast her ballot privately and independently.

21. The Board agrees that the following measures will be implemented where necessary to make an otherwise inaccessible polling place Accessible on Election Day. The list of measures is not exhaustive; the Board may propose other reasonable, temporary measures subject to the review and approval of the United States.

- a. Portable ramps (including curb ramps) up to and including ramps six feet long, with side edge protection.

- b. Portable wedges or wedge ramps.
- c. Floor mats.
- d. Traffic cones.
- e. Relocating furniture or other movable barriers.
- f. Door stops.
- g. Propping open doors.
- h. Unlocking doors.
- i. Signage, including parking and accessible entrance directional signage.
- j. Portable buzzers or door bells.
- k. Removing astragals (center door posts) that are not a permanent part of the structure from doorways.

B. Survey and Review of Polling Place Locations

22. The Board shall revise its policies, practices, and procedures to select facilities to be used as polling places that do not exclude qualified individuals with disabilities from or deny them the benefits of the polling place, or otherwise subject them to discrimination on the basis of their disabilities. Within ninety (90) days of the Effective Date of this Agreement, the Board shall submit its revised policies, practices, and procedures to the United States for review and approval. Within ten (10) days of receiving comments from the United States, the Board shall incorporate in its policies, practices, and procedures any additions or modifications proposed by the United States that bring the Board's policies, practices, and procedures into compliance with the ADA.

23. The Board will adopt a polling place accessibility survey instrument that conforms with the 2010 Standards. The survey instrument will include: (1) measurements of each feature in the survey form (e.g., width of parking space, slope of curb ramp); (2) photographs of each element of the polling place and of each measurement; (3) the identification of all appropriate remedial measures, including the remedial measures in Paragraph 21 of this Agreement; and (4) measurements (including slope measurements) and photographs of each remedial measure as it will be implemented on Election Day. The survey instrument will be submitted to the United States for review and approval within sixty (60) days of the Effective Date of this Agreement. Within ten (10) days of receiving comments from the United States, the Board shall incorporate in its survey instrument any reasonable changes, additions, or modifications proposed by the United States.

24. For all polling place locations that were not surveyed by the United States in the April 2 Election, the Board will conduct a survey using the survey instrument referenced in Paragraph 23 of this Agreement. The Board will provide all surveys to the United States with all

surveys to be completed no later than one hundred twenty (120) days after the Effective Date of this Agreement. If the United States disputes the accuracy of a survey, then the Board will re-survey the portions of the polling place in question. If the United States concludes that the Board has proposed a remedial provision that does not fully address a barrier to accessibility, then the Board will propose and implement, subject to the review and approval of the United States, a remedial measure consistent with Paragraph 21 of this Agreement or relocate a polling place to a location that can be made Accessible on Election Day.

25. Following the United States' review and approval of a polling place survey, the Board will implement appropriate remedial provisions to make the polling place location Accessible on Election Day. If the Board chooses not to or is unable to implement one or more of the remedial provisions to make a polling place location Accessible on Election Day, it will relocate the inaccessible polling place location to a location that is Accessible on Election Day, selected pursuant to the process established by Paragraphs 24 and 26 of this Agreement. If the Board asserts, and the United States agrees, that remediation and relocation to an accessible polling place location are infeasible, then the Board shall comply with Title II's program accessibility requirements as described in Paragraph 20 of this Agreement.

26. The Board shall select polling place locations that are Accessible on Election Day to persons with disabilities. It shall be the Board's policy and practice to review each newly proposed polling place location to determine whether it is Accessible on Election Day prior to its use in an election. The Board shall use the survey instrument referenced in Paragraph 23 of this Agreement to make all future polling place location selections. If the Board ultimately determines that a newly proposed location is inaccessible (as defined by the survey instrument) and cannot be made Accessible on Election Day, then the Board will reject the location and continue searching until a location that will be Accessible on Election Day can be found subject to Paragraph 20.

27. When the Board identifies a new prospective polling place location, the Board will provide the United States notice within twenty-one (21) days of the selection of the proposed new location, along with copies of all surveys (including photographs) of the polling place. The new polling place location shall be selected pursuant to the process established by Paragraphs 24 and 26 of this Agreement. The United States' approval must be obtained before the Board uses the location in an election.

28. If the Board finds that it cannot implement a previously-approved remedial provision for a specific polling place location, the Board will immediately notify and confer with the United States. If the issue cannot be resolved to the United States' satisfaction, the Board will relocate the polling place location to an alternative location that is Accessible on Election Day pursuant to the process established by Paragraphs 24 and 26 of this Agreement.

C. Election Judge and Poll Worker Training

29. Prior to each¹ election during the term of this Agreement, as part of its training

¹ When elections are held within two months of each other, the training requirements of Section C will apply to the elections collectively as a set and not individually, such that the training need

program for Roving Deputies, election judges, poll managers, early access workers, and poll workers, the Board will provide training on Title II of the ADA and the requirements of this Agreement as applied to the Board's voting program, including:

- a. Voting room or area requirements, including requirements related to setting up the accessible voting machine, under the 2010 ADA Standards;
- b. Temporary remedial measures, including: (a) why such measures are necessary; (b) how the measures must be implemented (*e.g.*, how to install ramps, the placement of mats over (and not in front of) thresholds); and (c) a description of the role of the Board's Election Day Surveyors (EDSs), as set forth in Paragraph 34 of this Agreement, and the need to follow the instructions of the EDSs regarding the implementation of temporary measures on Election Day;
- c. Interacting with individuals with disabilities and making reasonable modifications necessary to ensure that qualified individuals with disabilities are afforded an equal opportunity to participate in the Board's voting program; and
- d. The Board's revised policies, practices, and procedures, including the policies, practices, and procedures revised pursuant to Paragraphs 16, 20, and 23 and Section F.

30. For each session of the training conducted under this Agreement, the Board shall maintain attendance logs reflecting the date of the training, names and titles of attendees, and the attendees' signatures.

31. After the first election occurring after the Effective Date of this Agreement, and at each training session for each election thereafter, the Board will identify each individual in attendance whose polling place was identified as non-compliant by an EDS compliance review from the previous election (pursuant to Paragraph 34 of this Agreement). The Board will explain to each individual the nature of the noncompliance and explain what must be done to remedy the identified issue(s) on Election Day.

32. Prior to each election during the term of this Agreement, the Board will provide training to all EDSs designated pursuant to Paragraph 34 of this Agreement. The training of the EDSs will address: (a) temporary measures, including why they are needed and how the measures must be implemented (*e.g.*, how to install ramps, the placement of mats over (and not in front of) thresholds); (b) how to resolve errors in the implementation of temporary measures on Election Day; (c) how to document the implementation of temporary measures on Election Day using checklists or compliance review forms referenced in Paragraph 33 of this Agreement; and (d) what the EDSs are required to do to implement the requirements of this Agreement.

D. Election Day Compliance Review

33. The Board will develop a checklist of the temporary measures to be implemented on Election Day at each polling place location where such measures are required. The checklist

not be repeated before the second election.

shall be included in the materials provided to each election judge and poll manager for Election Day and provided to each Board employee or vendor involved in installing or implementing temporary measures for Election Day. The checklist shall include clear instructions and diagrams for the remedial measures to be implemented by the election judge and poll manager. Copies of these checklists, instructions, and diagrams will be provided to the United States no later than sixty (60) days before each election.

34. The Board will designate Board personnel (or contractors) as EDSs to review compliance at the polling place locations where temporary measures are to be implemented on Election Day. The Board will provide at least three teams of two members in each citywide election. For each election that is not citywide, the Board will field a number of teams that is similarly proportionate to the size of the election. The EDSs shall review compliance with as many polling place locations in each election as is reasonable, with a minimum of twenty (20) polling places reviewed in each election for each team. Any polling place location found by the EDSs to be non-compliant in an election shall be reviewed by EDSs in the subsequent election. The EDSs shall review polling places where temporary measures are to be implemented on a rotating basis so that they are not reviewing the same polling place locations in a subsequent election, except for those found to be non-compliant.

35. The Board and the EDSs will use the checklist developed pursuant to Paragraph 33 of this Agreement to review compliance on Election Day. The EDSs shall document their compliance reviews (both compliant and non-compliant polling place locations) with detailed photographs. After documenting a non-compliant polling place location, the EDSs shall remedy any non-compliant implementation of a temporary remedy when possible. Copies of these compliance reviews will be provided to the United States within sixty (60) days after each election.

36. If the Board does not properly implement the temporary remedial measures necessary at a particular polling place location on Election Day in two (2) consecutive elections, and, if the polling place location is a Board-owned polling place location and the Board does not make permanent architectural remediation, then the Board will no longer use the polling place location and will relocate it to a location that is Accessible on Election Day. If the Board asserts, and the United States agrees, that remediation and relocation to an accessible polling place location are infeasible, then the Board shall comply with Title II's program accessibility requirements, as described in Paragraph 20 of this Agreement.

E. Staff Training

37. Within one hundred twenty (120) days of the Effective Date of this Agreement, the Board will provide training from an outside source to all Board employees and any relevant contractors or vendors, including those who conduct surveys or implement temporary measures, on Title II of the ADA and the requirements of this Agreement as applied to the Board's voting program, including:

- a. Polling place accessibility requirements under the 2010 ADA Standards;
- b. Temporary remedial measures, including: (a) why such measures are necessary;

- (b) how the measures must be implemented (*e.g.*, how to install ramps, the placement of mats over (and not in front of) thresholds); and (c) a description of the role of the Board's Election Day Surveyors (EDSs), as set forth in Paragraph 34 of this Agreement, and the need to follow the instructions of the EDSs regarding the implementation of temporary measures on Election Day;
- c. Interacting with individuals with disabilities and making reasonable modifications necessary to ensure that qualified individuals with disabilities are afforded an equal opportunity to participate in the Board's voting program; and
- d. The Board's revised policies, practices, and procedures, including the policies, practices, and procedures revised pursuant to Paragraphs 16, 20, 22, and 23 and Section F.

38. The Board may tape the initial training to use for employees hired after the initial training. The Board will provide this training on an annual basis for the duration of this Agreement. The Board must obtain the United States' approval of the trainer and the materials to be used in the training.

39. For each session of the training conducted under this Agreement, the Board shall maintain attendance logs reflecting the date of the training, names and titles of attendees, and the attendees' signatures.

F. Complaint Collection and Review Process

40. Within ninety (90) days of the Effective Date of this Agreement, the Board will submit for approval by the United States procedures providing for the receipt of and prompt and equitable resolution of complaints alleging that the Board's voting program discriminates against persons with disabilities. 28 C.F.R. § 35.107(b). Within ten (10) days of receiving comments from the United States, the Board shall incorporate in its policies, practices, and procedures any additions or modifications proposed by the United States that bring the Board's policies, practices, and procedures into compliance with the ADA.

41. The complaint procedures shall include procedures for election judges and poll workers to gather and document appropriate information from a complainant on site at a polling place during an election, and for the Board to accept and document phone calls and emails received prior to, during, or after an election. The Board will publish the complaint procedures on the Board's website and provide notices at each polling place during each election. These procedures will be in place for all elections after the Effective Date of this Agreement.

42. Within thirty (30) days of the Effective Date of this Agreement and for the term of this Agreement, the Board will designate an employee to serve as an ADA Coordinator for the Board. The ADA Coordinator will be trained in and knowledgeable about the ADA and the terms of this Agreement, and will investigate any complaint that the Board, election judges, or any other person under the authority or control of the Board receives alleging that the Board's voting program discriminates against persons with disabilities. The ADA Coordinator will also implement the complaint procedures described in Paragraph 40. 28 C.F.R. § 35.107(a).

43. The Board will publish a Notice to Voters with Disabilities on its website and at all polling places for all elections within one hundred twenty (120) days of the Effective Date of this Agreement, and for the term of this Agreement, that notifies voters of the name of, and contact information for, the Board's ADA Coordinator.

44. Every ninety (90) days, the Board will provide a written report to the United States including summaries of any written complaints, complaints received as voice messages or other audio files, or written descriptions of verbal complaints, that the Board, the election judges or poll workers, or any other person under the authority or control of the Board receives alleging that the Board's voting program discriminates against persons with disabilities; and any written responses provided by the Board and a written description of actions taken in response to such complaints. The Board will provide the United States with copies of any written complaints, complaints received as voice messages or other audio files, or written descriptions of verbal complaints, upon request.

III. Enforcement and Miscellaneous Provisions

45. Delivery of Materials: All notices, demands, or other communications including reporting materials sent to the United States pursuant to this Agreement shall be in writing and delivered by e-mail to elizabeth.johnson@usdoj.gov and christine.kim2@usdoj.gov (or to any other e-mail address that the United States designates during the term of this Agreement) or by overnight delivery to U.S. Department of Justice, Civil Rights Division, ATTN: Disability Rights Section, 950 Pennsylvania Avenue NW, Washington, D.C. 20530. The cover letter shall include a subject line referencing the Board and DJ No. 204-42-155.

46. Reviewing Compliance: The United States may review compliance with this Agreement at any time. The Board will cooperate fully with the United States' efforts to monitor compliance with this Agreement, including but not limited to providing the United States with timely access to polling places (including on Election Day), maps, surveys, employees, contractors, training sessions, relevant documents, and other reasonably requested information. Biannually, the parties will confer to assess the Board's compliance with this Agreement. If the United States believes that the Board has failed to comply in a timely manner with any requirement of this Agreement, or that any requirement has been violated, the United States will so notify the Board in writing and will attempt to resolve the issue in good faith. If the United States is unable to reach a satisfactory resolution of the issue within thirty (30) days of the date it notifies the Board, the United States may file a civil action in federal district court to enforce the terms of this Agreement, or take any other action to enforce Title II of the ADA.

47. Term: This Agreement shall terminate in three years.

48. Early or Partial Termination: This Agreement or a distinct, severable part of the Agreement will terminate earlier than three years if the United States determines that the Board has demonstrated durable compliance with Title II of the ADA and this Agreement, or with that distinct, severable part, as applicable. In determining whether the Board has demonstrated durable compliance with a part of the Agreement, the Department may assess collectively all the requirements of the Agreement to determine whether the intended outcome of the part has been achieved.

49. Titles and Headings: Titles and other headings contained in this Agreement are included only for ease of reference and shall have no substantive effect.

50. Entire Agreement: This Agreement, including Attachment A, constitutes the entire agreement between the United States and the Board on the matters raised herein and no other statement or promise, written or oral, made by any party or agents of any party, that is not contained in this written Agreement, including Attachment A, shall be enforceable.

51. Severability: If any term of this Agreement is determined by any court to be unenforceable, the other terms of this Agreement shall nonetheless remain in full force and effect.

52. Non-Waiver: Failure by the United States to enforce any provisions or deadlines in this Agreement shall not be construed as a waiver of the right of the United States to enforce any deadlines or provisions of this Agreement.

53. Limitation: This Agreement is limited to resolving claims under Title II of the ADA related to the facts specifically set forth in Paragraphs 1 through 4, above, concerning physical accessibility of polling places. Nothing in this Agreement relates to other provisions of the ADA or affects the Board's obligations to comply with any other federal, state, or local statutory, administrative, regulatory, or common law obligation, including those relating to nondiscrimination against individuals with disabilities.

54. Modifications: Any modifications of this Agreement, such as extensions of the time limits for performance imposed by the Agreement, may be made only by the mutual written consent of the Parties.

55. Binding Nature of Agreement: This Agreement shall be applicable to and binding upon the Board, its officers, agents, employees, and assigns.

56. Authority: The individuals signing this Agreement represent that they are authorized to do so on behalf of the respective entity for which they have signed.

57. Preservation of Documents: Throughout the term of this Agreement, the Board shall preserve documents, electronically stored information, or other information related to this Agreement and necessary to determining the Board's compliance with this Agreement.

58. Counterparts: This Agreement may be executed in any number of counterparts, each of which is an original, and all of which taken together constitute one single document.

59. Publicly Available: A copy of this document will be made available to any person by the Board on request.

FOR THE UNITED STATES OF AMERICA:

ERIC S. DREIBAND
Assistant Attorney General
Civil Rights Division

REBECCA B. BOND
Chief

ANNE S. RAISH
Principal Deputy Chief



ELIZABETH JOHNSON
CHRISTINE KIM
Trial Attorneys
Disability Rights Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave., NW
Washington, D.C. 20530
Telephone: (202) 307-3543
Facsimile: (202) 305-9775
elizabeth.johnson@usdoj.gov
christine.kim@usdoj.gov

Date: 1/12/21

**FOR THE BOARD OF ELECTION COMMISSIONERS
FOR THE CITY OF ST. LOUIS:**

/s/

LEO G. (GARY) STOFF, JR.

Republican Director

The Board of Election Commissioners for the City of St. Louis

300 N. Tucker Blvd.

St. Louis, MO 63101

Telephone: (314) 622-4336

Date: 1/6/21_____

/s/

D. BENJAMIN BORGMEYER

Democratic Director

The Board of Election Commissioners for the City of St. Louis

300 N. Tucker Blvd.

St. Louis, MO 63101

Telephone: (314) 622-4336

Date: 1/6/21_____

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Alexian Court Apartments

Location Address: 2636 Chippewa Street

C	Exterior Route to Accessible Entrance	Comments
C3	Is the route free of openings/gaps that exceed 1/2"? 4.3.6, 4.5.4; 302.3 ²	Multiple gaps that exceed 1/2" at the top landing of the ramp and in the vicinity of the power door operator.

D	Polling Place Entrance	Comments
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.

F	Within the Voting Area	Comments
F5	Is there room for a 36" wide route to the registration table and to voting stations? 4.3.3; 403.5.1	No approach/turning space provided at ballot box.

G	Ramp to Building Entry	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slopes exceed 1:12.
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slopes exceed 1:48.
G7	If the ramp changes direction at a landing, is the landing at least 60" by 60"? Is the landing level? 4.8.4(3); 405.7.4	Intermediate landing is not 60" by 60" and the slope of the landing exceeds 1:48.
G8	If the rise exceeds 6", are there handrails on both sides? Are the handrails between 34" and 38" above the ramp surface? 4.8.5; 405.8, 505.4	Handrails are too low.
G9	If the rise exceeds 6", is there edge protection (either a level surface extending 12" beyond the ramp surface, or 4" or more curb, or rail at 4" or less)? 4.8.7; 405.9	Edge protection is missing.

² The first set of numbers in each question references the applicable provisions of the 1991 ADA Standards for Accessible Design; the second set of numbers in each question references the applicable provisions of the 2010 ADA Standards for Accessible Design.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: American-Czech Educational Center

Location Address: 4690 Lansdowne Ave.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible aisle demarcation.

C	Exterior Route to Accessible Entrance from Sidewalk and Parking	Comments
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” in the asphalt surface in the vicinity of the curb ramp.
C8	Are curb ramps at least 36” wide? Are curb ramps 1:12 maximum running slope? 4.1.2(4), 4.5.2, 4.7.2, 4.7.3, 4.8.2; 303.4, 405.2, 405.5, 406.1	Running slope exceeds 1:12 at curb ramp at building.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at sidewalk, driveway, across parking area, and curb ramp to building walk and entry area.

D	Polling Place Entrance	Comments
D3	At the pull side: is there 18” clear space to the latch side? At the push side: is there a closer and latch? And if so, is there 12” clear space to the side of the door? 4.13.6; 404.2.4	Entry door lacks 18” clear space at latch side.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4”, is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2”.

E	Route from Entry to Voting Area	Comments
E2	Are there wall mounted protruding objects? 4.4.1; 307.2	A phone cubby protrudes from interior wall.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Blewett Middle School

Location Address: 1927 Cass Ave.

C	Exterior Route from Sidewalk and Bus Stop to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at sidewalk, driveway crossing, driveway entry area (part of route), site sidewalk, and top of ramp.
C3	Is the route free of openings/gaps that exceed 1/2"? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at sidewalk, driveway crossing, driveway entry area (part of route), site sidewalk, and top of ramp.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at the route near the entry.

D	Polling Place Entrance	Comments
D2	Is the hardware operable (no pinching, twisting or tight grasping required)? 4.13.9; 309.4, 404.2.7	Door #3 (the accessible entrance) has no exterior hardware. Door locked. No bell.
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48 at Door #3.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4", is it beveled? 4.13.8; 404.2.5	Threshold height/change in level exceeds 1/2" at Door #3.
D9	If main entry is inaccessible, is there a sign directing voters to the accessible door? 4.1.2(7)(c); 216.6	No sign posted. Main entrance has steps.
D10	If the accessible entry is not the main entry, is it unlocked? Does it have a bell? 28 C.F.R. 35.130, 35.133	No exterior hardware. Door locked. No bell.

G	Ramp from Driveway to Door #3	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slope exceeds 1:12 at driveway end of ramp.
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slopes exceed 1:48.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Bryan Hill School

Location Address: 2128 Gano Ave.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.

C	Exterior Route from Sidewalk and Parking Lot to Accessible Entrance	Comments
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” at the sidewalk and at the top of the sloped area at the entry.

D	Polling Place Entrance	Comments
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Clay Academy

Location Address: 3820 14th Street

C	Exterior Route from Sidewalk to Accessible Entrance	Comments
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at the sidewalk and route to the door.

D	Polling Place Entrance	Comments
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48 (also exceeds 1:12).
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4", is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2".

G	Ramp at Accessible Entrance	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slope exceeds 1:12.
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slopes exceed 1:48.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Columbia School

Location Address: 3120 St. Louis Ave.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.

C	Exterior Route from Sidewalk to Accessible Entrance (Door #3)	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2” at the sidewalk and in the parking lot.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” at the sidewalk and in the parking lot.
C4	Are the route surfaces stable, firm, and slip resistant? 4.3.6, 4.5.1; 302.1	Multiple areas with loose gravel and deteriorated asphalt at route in the parking lot.

C	Exterior Route from Slattery St. to Second Accessible Entrance (Door #8 - behind school).	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2” at the sidewalk, driveway paving, and playground.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” at the sidewalk, driveway paving, and playground.
C4	Are the route surfaces stable, firm, and slip resistant? 4.3.6, 4.5.1; 302.1	Multiple areas with loose gravel and deteriorated asphalt at driveway paving and playground.

D	Polling Place Main Entrance	Comments
D9	If main entry is inaccessible, is there a sign directing voters to the accessible door? 4.1.2(7)(c); 216.6	No sign posted directing voters to an accessible entrance. Route to main entrance has steps.

D	Polling Place Accessible Entrance (Door #3)	Comments
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4”, is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2”.

Attachment A: ADA Violations Identified During April 2, 2019 Election

D9	If main entry is inaccessible, is there a sign directing voters to the accessible door? 4.1.2(7)(c); 216.6	No sign posted directing voters to Door #8. Lift out of order.
----	--	--

D	Polling Place Back Entrance (Door #8, Secondary Accessible Entrance)	Comments
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4", is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2".
D10	If the accessible entry is not the main entry, is it unlocked? Does it have a bell? 28 C.F.R. 35.130, 35.133	No exterior hardware. Door locked. No bell.

E	Route from Accessible Entrance, Door #3 to Voting Area	Comments
E5	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2". A lift located at a flight of steps was not working.
E10	Interior door(s): maximum 5 lbs. force? 4.13.11; 309.4	Interior door operating force exceeds 5 lbs.

F	Within the Voting Area	Comments
F7	Is there turning space in front of at least one voting machine? 4.2.3; 304.3	Insufficient turning or approach space at voting machines.

G	Ramp from Sidewalk to Parking Lot and Accessible Entry, Door #3	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slope exceeds 1:12 on portion of ramped driveway.
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slope exceeds 1:48 on portion of ramped driveway.

H	Lifts	Comments
H1	Does the lift work (as of the day of survey)? 28 C.F.R. 35.130, 35.133	Lift not working.

		Other Comments/Notes
		There was no accessible route from Door #3 to the voting area. Poll worker informed us that Door #8 was designated as the accessible entry. Door #8 is only accessible via Slattery Street and the playground. It is not clear that the public is allowed access to the playground. There is no accessible route from Door #3 to Door #8.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Concordia Turners

Location Address: 6432 Gravois Ave.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.

C	Exterior Route from Sidewalk to Accessible Entrance	Comments
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2”.

C	Exterior Route from Parking to Accessible Entrance	Comments
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2”.

D	Polling Place Entrance	Comments
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.

G	Ramp from Sidewalk to Parking Lot (Driveway)	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slopes exceed 1:12.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Dunn-Marquette Recreation Center

Location Address: 4025 Minnesota Ave.

B	Passenger Drop-Off Area	Comments
B1	Are the slopes at the pull-up space 1:48 maximum? 4.6.6; 503.4	Slopes exceed 1:48.
B2	Are the slopes at the access aisle 1:48 maximum? 4.6.6; 503.4	Slopes exceed 1:48.

C	Exterior Route to Accessible Entrance	Comments
C1	Is the route at least 36" wide? 4.3.3; 403.5.1	Route blocked with sign.
C2	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at sidewalk.
C3	Is the route free of openings/gaps that exceed 1/2"? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at sidewalk and curb ramp landing area.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at sidewalk, walk from the drop-off to the entry, and drop-off curb ramp.

D	Polling Place Entrance	Comments
D1	Is the clear opening width at least 32"? 4.13.5; 404.2.3	Door was propped open with a wedge causing clear opening width of less than 32".

E	Route from Entry to Voting Area	Comments
E2	Are there wall mounted protruding objects? 4.4.1; 307.2	A drinking fountain and a cage over a strobe protrude from interior walls.

G	Ramps	Comments
G8	If the rise exceeds 6", are there handrails on both sides? Are the handrails between 34" and 38" above the ramp surface? 4.8.5; 405.8, 505.4	Handrail missing on one side.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Grbic Hall

Location Address: 4071 Keokuk

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible aisle demarcation.

D	Polling Place Entrance	Comments
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4", is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2".

E	Route from Entry to Voting Area	Comments
E2	Are there wall mounted protruding objects? 4.4.1; 307.2	A fire extinguisher protrudes from interior wall.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Greater Faith Church Multiplex

Location Address: 4125 Natural Bridge Road

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.

C	Exterior Route to Accessible Entrance from Sidewalk and Parking	Comments
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2”.

D	Polling Place Entrance	Comments
D2	Is the hardware operable (no pinching, twisting or tight grasping required)? 4.13.9; 309.4, 404.2.7	Entry door has knob hardware.
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4”, is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2”.

E	Route from Entry to Voting Area	Comments
E5	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2”.
E8	Interior door(s): 32” minimum width? 4.13.5; 404.2.3	Clear opening width is less than 32”.

F	Within the Voting Area	Comments
F1	Is the flooring stable, firm, and slip resistant? 4.3.6, 4.5.1; 302.1	Mats on the floor were loose.
F2	Are there wall mounted protruding objects? 4.4.1; 307.2	A drinking fountain and a counter protrude from the wall.

G	Interior Ramps from Entry to Polling Area	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slopes exceed 1:12 on two interior ramps.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Henry Elementary School

Location Address: 1220 N. 10th St.

C	Exterior Route from Sidewalk and Bus Stop to Main Gate and Accessible Entrance	Comments
C1	Is the route at least 36" wide? 4.3.3; 403.5.1	Route to the curb ramp blocked by parked vehicle.
C2	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at curb ramps, sidewalk, and gate.
C3	Is the route free of openings/gaps that exceed 1/2"? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at sidewalk.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at bus stop curb ramp and Henry School side curb ramp.

C	Exterior Route from Sidewalk/Main Gate to Accessible Entrance – Door #7	Comments
C2	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at route to Door #7. Hose crossed the route.
C3	Is the route free of openings/gaps that exceed 1/2"? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at route to Door #7.
C4	Are the route surfaces stable, firm, and slip resistant? 4.3.6, 4.5.1; 302.1	Multiple areas with loose gravel and deteriorated asphalt at route to Door #7.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at route to Door #7.

D	Polling Place Accessible Entrance – Door #7	Comments
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope at Door #7 exceeds 1:48.
D9	If main entry is inaccessible, is there a sign directing voters to the accessible door? 4.1.2(7)(c); 216.6	No sign posted at main entry.
D10	If the accessible entry is not the main entry, is it unlocked? Does it have a bell? 28 C.F.R. 35.130, 35.133	Door locked. No bell.

F	Within the Voting Area	Comments
F5	Is there room for a 36" wide route to the registration table and to voting stations? 4.3.3; 403.5.1	Cords were draped across the route and were not secured.
F7	Is there turning space in front of at least one voting machine? 4.2.3; 304.3	Insufficient turning or approach space at voting machines.

Attachment A: ADA Violations Identified During April 2, 2019 Election

		Other Comments/Notes
		Door #7 (accessible entrance) is in a children's outdoor play area. Entry is adjacent to the garbage pickup and not visible from the street. It was unclear that the public was allowed to use the area because of the presence of school children.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Herzog Elementary School

Location Address: 5831 Pamplin Place

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.

C	Exterior Route from Sidewalk and Parking to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Change in level that exceeds 1/2”. Route from street parking has a curb. No curb ramp provided.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” in route from sidewalk to entry.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slope exceeds 1:48 at route from sidewalk to the entry ramp.

C	Exterior Route to Accessible Entrance from Parking	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Change in level that exceeds 1/2”. Route from parking has multiple steps.

F	Within the Voting Area	Comments
F7	Is there turning space in front of at least one voting machine? 4.2.3; 304.3	Insufficient turning or approach space at voting machines.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Holy Center Church of God in Christ

Location Address: 8735 Goodfellow Blvd.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Slopes exceed 1:48.
A5	Are the surfaces stable, firm, and slip resistant? 4.1.2(4), 4.5.1; 502.4, 302.1	Surfaces have loose gravel and broken asphalt.

C	Exterior Route from Sidewalk to Parking Area Adjacent to Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2”.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2”.
C4	Are the route surfaces stable, firm, and slip resistant? 4.3.6, 4.5.1; 302.1	Multiple areas with deteriorated asphalt.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Multiple areas with cross slopes that exceed 1:48.

C	Exterior Route from Parking Area Adjacent to the Entrance to the Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2” at route and entry stoop.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” at route to entry and entry stoop.
C4	Are the route surfaces stable, firm, and slip resistant? 4.3.6, 4.5.1; 302.1	Multiple areas with deteriorated asphalt.
C7	Are there overhanging objects within 80” of the route? 4.1.2(3), 4.4.1; 307.4	Entry is under a concrete stair/structure to the upper level.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Multiple areas with cross slopes that exceed 1:48 at route from parking to entry.

Attachment A: ADA Violations Identified During April 2, 2019 Election

D	Polling Place Entrance	Comments
D2	Is the hardware operable (no pinching, twisting or tight grasping required)? 4.13.9; 309.4, 404.2.7	Entry door has knob hardware.
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.

F	Within the Voting Area	Comments
F7	Is there turning space in front of at least one voting machine? 4.2.3; 304.3	Insufficient turning or approach space at voting machines.

G	Ramp through Parking Lot (Part of Route from Sidewalk)	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slope exceeds 1:12.
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slopes exceed 1:48.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Hopewell Missionary Baptist Church

Location Address: 915 N. Taylor Ave.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted. ISA on ground painted over.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Slopes exceed 1:48.

C	Exterior Route to Accessible Entrance from Parking	Comments
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at route across drive lane.

C	Exterior Route to Accessible Entrance from Sidewalk	Comments
C1	Is the route at least 36” wide? 4.3.3; 403.5.1	Sign obstructs route.
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at sidewalk and route from the front sidewalk to the entry.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at front sidewalk and sidewalk by the driveway.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at front sidewalk and sidewalk by the driveway.

D	Polling Place Entrance	Comments
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4”, is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2”.

G	Ramp from Front Sidewalk to Entry	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slopes exceed 1:12.
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slopes exceed 1:48.
G6	If the rise exceeds 30”, is there a 60” long level landing separating runs? 4.8.4(2); 405.6, 405.7	Rise exceeds 30” and there are no landings.
G8	If the rise exceeds 6”, are there handrails on both sides? Are the handrails between 34” and 38” above the ramp surface? 4.8.5; 405.8, 505.4	Rise exceeds 6” and there are no handrails.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Immaculate Heart of Mary Church

Location Address: 4092 Blow St.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible aisle demarcation.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Slopes exceed 1:48 at parking space.

B	Passenger Drop-Off Area	Comments
B1	Are the slopes at the pull-up space 1:48 maximum? 4.6.6; 503.4	Slopes exceed 1:48.
B4	Is there a curb ramp (if needed)?	No curb ramp provided at change in level.

C	Exterior Route to Accessible Entrance from Sidewalk	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2” at the route from the sidewalk and the entry area.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” at sidewalk and route to entry.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at sidewalk, drive lane and route to entry.

D	Polling Place Entrance	Comments
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4”, is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2”.

E	Route from Entry to Voting Area	Comments
E2	Are there wall mounted protruding objects? 4.4.1; 307.2	A drinking fountain protrudes from interior wall.

G	Ramp at Entry	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slopes exceed 1:12.
G8	If the rise exceeds 6”, are there handrails on both sides? Are the handrails between 34” and 38” above the ramp surface? 4.8.5; 405.8, 505.4	One handrail discontinuous, one handrail missing.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Julia Davis Library

Location Address: 4415 Natural Bridge Road

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No van accessible sign posted.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Slope exceeds 1:48.

C	Exterior Route from Parking Lot to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2".
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2".
C4	Are the route surfaces stable, firm, and slip resistant? 4.3.6, 4.5.1; 302.1	Loose materials at base of curb ramp by parking.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at multiple areas.

C	Exterior Route from Sidewalk to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at route to building, sidewalk, and ramp.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at route to building from sidewalk and ramp.

D	Polling Place Entrance	Comments
D6	Interior vestibule door(s): maximum 5 lbs. force? 4.13.11; 309.4	Interior door operating force exceeds 5 lbs.

G	Ramp at Route from Sidewalk and Parking to Accessible Entry	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slope exceeds 1:12 at top end.
G8	If the rise exceeds 6”, are there handrails on both sides? Are the handrails between 34” and 38” above the ramp surface? 4.8.5; 405.8, 505.4	Handrail missing on one side of ramp.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Kennard CJA Elementary School

Location Address: 5031 Potomac St.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No van accessible signage.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.

C	Exterior Route to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2” at sidewalk.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at route to entry, drive lane, drive entry, and transition to the sidewalk.

E	Route from Entry to Voting Area	Comments
E2	Are there wall mounted protruding objects? 4.4.1; 307.2	A fire extinguisher protrudes from interior wall.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Long Middle School

Location Address: 5028 Morganford Rd.

C	Exterior Route to Accessible Entrance from Sidewalk and Street Parking	Comments
C2	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at sidewalk and route to entry.
C3	Is the route free of openings/gaps that exceed 1/2"? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at route to entry across parking lot.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 in multiple locations at sidewalk.

D	Polling Place Entrance	Comments
D1	Is the clear opening width at least 32"? 4.13.5; 404.2.3	Entry is less than 32" clear opening width.
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.

E	Route from Entry to Voting Area	Comments
E2	Are there wall mounted protruding objects? 4.4.1; 307.2	Fire extinguisher and drinking fountain protrude from interior wall.

G	Ramp from Sidewalk to Entrance	Comments
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slope exceeds 1:48.
G8	If the rise exceeds 6", are there handrails on both sides? Are the handrails between 34" and 38" above the ramp surface? 4.8.5; 405.8, 505.4	Handrail missing on one side.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Metro Academy Academic and Classical High School

Location Address: 4015 McPherson Ave.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.
A5	Are the surfaces stable, firm, and slip resistant? 4.1.2(4), 4.5.1; 502.4, 302.1	Parking lot has loose gravel areas.

C	Exterior Route to Accessible Entrance from Parking Lot	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Change in level that exceeds 1/2” at the gate area.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2”.

C	Exterior Route to Accessible Entrance from Sidewalk and Curb Ramp	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Change in level that exceeds 1/2" at the curb ramp.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” at curb ramp, sidewalk, and route from the curb ramp to the door.
C8	Are curb ramps at least 36” wide? Are curb ramps 1:12 maximum running slope? 4.1.2(4), 4.5.2, 4.7.2, 4.7.3, 4.8.2; 303.4, 405.2, 405.5, 406.1	Running slope exceeds 1:12.

G	Ramp from Parking Lot	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slopes exceed 1:12.
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slopes exceed 1:48.
G8	If the rise exceeds 6”, are there handrails on both sides? Are the handrails between 34” and 38” above the ramp surface? 4.8.5; 405.8, 505.4	Handrail missing on one side.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Newstead Missionary Baptist Church

Location Address: 4370 N. Market St.

A	Parking Lot	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.

C	Exterior Route from Parking Lot to Gate	Comments
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at the sidewalk.

C	Exterior Route from Street/Curb Ramp to Gate	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at sidewalk and curb ramp.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” at sidewalk and curb ramp.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at sidewalk and curb ramp.

C	Exterior Route from Gate to Accessible Entrance	Comments
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at sidewalk.

E	Route from Entry to Voting Area	Comments
E10	Interior door(s): maximum 5 lbs. force? 4.13.11; 309.4	Interior door operating force exceeds 5 lbs.

G	Ramp from the Sidewalk down to the Accessible Entrance	Comments
G9	If the rise exceeds 6”, is there edge protection (either a level surface extending 12” beyond the ramp surface, or 4” or more curb, or rail at 4” or less)? 4.8.7; 405.9	Lacks edge protection.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Nottingham School
 Location Address: 4915 Donovan Ave.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.

C	Exterior Route to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2” at route to entry and a trench.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at sidewalk.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at route to entry and sidewalk.

D	Polling Place Entrance	Comments
D3	At the pull side: is there 18” clear space to the latch side? At the push side: is there a closer and latch? And if so, is there 12” clear space to the side of the door? 4.13.6; 404.2.4	Railings at door block approach space.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4”, is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2”.
D9	If main entry is inaccessible, is there a sign directing voters to the accessible door? 4.1.2(7)(c); 216.6	Main entry has steps. No signage directing voters to accessible entry posted.

E	Route from Entry to Voting Area	Comments
E2	Are there wall mounted protruding objects? 4.4.1; 307.2	A fire extinguisher and a defibrillator cabinet protrude from interior walls.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Omega Center

Location Address: 3900 Goodfellow Blvd.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No van accessible signage posted.

C	Exterior Route to Accessible Entrance from Bus Stop, Sidewalk and Parking	Comments
C2	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at route to entry, sidewalk, and route from bus stop.
C3	Is the route free of openings/gaps that exceed 1/2"? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at sidewalk and route from bus stop.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at sidewalk and route from bus stop.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Park Place Apartments

Location Address: 4394 Laclede Ave.

C	Exterior Route to Accessible Entrance from Sidewalk and Curb Ramp	Comments
C2	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Changes in level that exceed 1/2" at curb ramp, sidewalks in both directions, and base of the ramp.
C3	Is the route free of openings/gaps that exceed 1/2"? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at sidewalks.
C4	Are the route surfaces stable, firm, and slip resistant? 4.3.6, 4.5.1; 302.1	Gravel, debris and broken concrete at sidewalk at the top of the ramp.
C8	Are curb ramps at least 36" wide? Are curb ramps 1:12 maximum running slope? 4.1.2(4), 4.5.2, 4.7.2, 4.7.3, 4.8.2; 303.4, 405.2, 405.5, 406.1	Running slope exceeds 1:12.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at sidewalks.

D	Polling Place Accessible Entrance	Comments
D1	Is the clear opening width at least 32"? 4.13.5; 404.2.3	The traffic cone placed in the door opening to keep the door from swinging shut and locking reduces the clear opening width to less than 32".
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.
D9	If main entry is inaccessible, is there a sign directing voters to the accessible door? 4.1.2(7)(c); 216.6	No sign posted at main entry.

E	Route from Entry to Voting Area	Comments
E10	Interior door(s): maximum 5 lbs. force? 4.13.11; 309.4	Interior door operating force exceeds 5 lbs. at the elevator vestibule.

F	Within the Voting Area	Comments
F5	Is there room for a 36" wide route to the registration table and to voting stations? 4.3.3; 403.5.1	Wires were draped across the route and were not secured.
F7	Is there turning space in front of at least one voting machine? 4.2.3; 304.3	Insufficient turning or approach space at voting machines.

Attachment A: ADA Violations Identified During April 2, 2019 Election

G	Ramp from Sidewalk to Accessible Entrance	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slopes exceed 1:12.
G8	If the rise exceeds 6", are there handrails on both sides? Are the handrails between 34" and 38" above the ramp surface? 4.8.5; 405.8, 505.4	Handrails do not extend the full length of ramp. Handrails are less than 34" above ramp surface.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: St. John the Baptist Parish Center

Location Address: 4170 Delor

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No van accessible sign posted.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Slopes exceed 1:48.

C	Exterior Route to Accessible Entrance	Comments
C6	Are there post mounted protruding objects? 4.1.2(3), 4.4.1; 307.3	Handrail extensions protrude over circulation path.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slope exceeds 1:48 at drive lane, route to entry, and area near entrance.

D	Polling Place Entrance	Comments
D9	If main entry is inaccessible, is there a sign directing voters to the accessible door? 4.1.2(7)(c); 216.6	No signage providing direction to accessible entry.

F	Within the Voting Area	Comments
F2	Are there wall mounted protruding objects? 4.4.1; 307.2	Wall hung religious figure projects over circulation path to voting machine.

G	Ramps	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slope exceeds 1:12.
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slope exceeds 1:48.
G5	Is there a 60” long level landing at the top and bottom of each section? 4.8.4; 405.7	Slopes exceed 1:48 at top and bottom of ramp.
G8	If the rise exceeds 6”, are there handrails on both sides? Are the handrails between 34” and 38” above the ramp surface? 4.8.5; 405.8, 505.4	Handrail discontinuous on one side.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: St. Peter AME Church

Location Address: 4730 Margarett Ave.

C	Exterior Route to Accessible Entrance from Sidewalk	Comments
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at sidewalk.

D	Polling Place Entrance	Comments
D3	At the pull side: is there 18" clear space to the latch side? At the push side: is there a closer and latch? And if so, is there 12" clear space to the side of the door? 4.13.6; 404.2.4	Entry door lacks clear space at latch side.
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4", is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2".

E	Route from Entry to Voting Area	Comments
E5	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level exceed 1/2" at interior flooring.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: St. Philips Evangelical Lutheran Church

Location Address: 2424 Annie Malone Dr.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Slopes exceed 1:48.

C	Exterior Route from Parking Lot to Sidewalk	Comments
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48.

C	Exterior Route from Sidewalk to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2” at sidewalk, ramp, and paving near the entry.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” at route from parking, ramp, and paving near the entry.
C5	Are there wall mounted protruding objects? 4.4.1; 307.2	A mailbox by entry door protrudes into the circulation path.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at route from parking to the top of the ramp.

	Polling Place Entrance	
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4", is it beveled? 4.13.8; 404.2.5	Door has a sill with a change in level that exceeds 1/2".

F	Within the Voting Area	Comments
F5	Is there room for a 36” wide route to the registration table and to voting stations? 4.3.3; 403.5.1	Wires were draped across the route and were not secured.

G	Ramp from Sidewalk to Accessible Entrance	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slope exceeds 1:12.
G2	Cross slope maximum 1:48? 4.8.6; 405.3	Cross slopes exceed 1:48.
G6	If the rise exceeds 30”, is there a 60” long level landing separating runs? 4.8.4(2); 405.6, 405.7	Rise exceeds 30” and there are no intermediate landings.
G8	If the rise exceeds 6”, are there	Handrails missing.

Attachment A: ADA Violations Identified During April 2, 2019 Election

	handrails on both sides? Are the handrails between 34" and 38" above the ramp surface? 4.8.5; 405.8, 505.4	
--	--	--

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Timothy Lutheran Church

Location Address: 6704 Fyler Ave.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible aisle demarcation.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Cross slopes exceed 1:48 at van accessible aisle.

C	Exterior Route to Accessible Entrance from Sidewalk	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2" at drive, route to entry from sidewalk, and entry.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Grate with openings that exceed 1/2".
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at top of curb ramp.

C	Exterior Route to Accessible Entrance from Parking	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2".
C8	Are curb ramps at least 36” wide? Are curb ramps 1:12 maximum running slope? 4.1.2(4), 4.5.2, 4.7.2, 4.7.3, 4.8.2; 303.4, 405.2, 405.5, 406.1	Running slopes exceed 1:12 at curb ramp from access aisle to entry.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at top of curb ramp.

D	Polling Place Entrance	Comments
D3	At the pull side: is there 18” clear space to the latch side? At the push side: is there a closer and latch? And if so, is there 12” clear space to the side of the door? 4.13.6; 404.2.4	Entry door has closer. Push side has less than 12” clear space at latch side.

G	Ramp on Drive from Sidewalk	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slope exceeds 1:12.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Union Avenue Christian Church

Location Address: 733 North Union Avenue

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible aisle demarcation.

C	Exterior Route to Accessible Entrance from Sidewalk and Parking Lot	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2” at sidewalk and route into and through the parking area.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2” at paving in parking lot.
C5	Are there wall mounted protruding objects? 4.4.1; 307.2	Ashtray protrudes from exterior wall by entry.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 in multiple locations.

D	Polling Place Entrance	Comments
D1	Is the clear opening width at least 32”? 4.13.5; 404.2.3	Clear opening width of entry door is less than 32”.
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.
D6	Interior vestibule door(s): maximum 5 lbs. force? 4.13.11; 309.4	Interior vestibule door operating force exceeds 5 lbs.
D7	Interior vestibule door(s): is the hardware operable (no pinching, twisting or tight grasping required)? At the pull side: is there 18” clear space to the latch side? At the push side: is there a closer and latch? And if so, is there 12” clear space to the side of the door? Is the slope of the maneuvering space maximum 1:48? 4.13.9, 4.13.6; 309.4, 404.2.7 and 404.2.4.4, 405.7.1	Interior vestibule door has less than 18” clear space on pull side of door.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4”, is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2”.

Attachment A: ADA Violations Identified During April 2, 2019 Election

G	Ramp at Driveway/Pedestrian Route	Comments
G1	Running slope maximum 1:12? 4.8.2; 405.2	Running slopes exceed 1:12 at driveway (route from sidewalk to parking lot).

		Other Comments/Notes
		Police vehicle blocked accessible route to entrance.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Unity Christ Church

Location Address: 33 N. Skinker Blvd.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No van accessible sign posted.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Slopes exceed 1:48.

C	Exterior Route to Accessible Entrance from Sidewalk	Comments
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48.

D	Polling Place Entrance	Comments
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4", is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2".

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Walnut Park Library

Location Address: 5760 W. Florissant Ave.

A	Parking	Comments
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Cross slopes exceed 1:48 as there is a curb ramp located in van accessible aisle.

C	Exterior Route to Accessible Entrance from Sidewalk	Comments
C2	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2".

C	Exterior Route to Accessible Entrance from Parking	Comments
C2	Is the route free of changes in level that exceed 1/2"? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2".
C8	Are curb ramps at least 36" wide? Are curb ramps 1:12 maximum running slope? 4.1.2(4), 4.5.2, 4.7.2, 4.7.3, 4.8.2; 303.4, 405.2, 405.5, 406.1	Running slopes exceed 1:12 at curb ramp in van accessible aisle.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: West Side Missionary Baptist Church

Location Address: 4675 Page Blvd.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No van accessible sign.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible aisle demarcation.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Slopes exceed 1:48.
A5	Are the surfaces stable, firm, and slip resistant? 4.1.2(4), 4.5.1; 502.4, 302.1	Surfaces are gravel and some broken paving at parking area.

C	Exterior Route from Parking to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2” at route across alley.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2”.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at route from alley.

D	Polling Place Entrance	Comments
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4”, is it beveled? 4.13.8; 404.2.5	Threshold height exceeds 1/2”.

G	Ramp at Route from Parking to the Accessible Entrance	Comments
G8	If the rise exceeds 6”, are there handrails on both sides? Are the handrails between 34” and 38” above the ramp surface? 4.8.5; 405.8, 505.4	Rise of route exceeds 6”; slope exceeds 1:20. Handrails missing.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Williams Temple

Location Address: 1500 N. Union Blvd.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No van accessible sign.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible aisle demarcation. Existing striping at the space is difficult to see.
A4	Are the slopes 1:48 maximum in all directions? 4.6.3; 502.4	Slopes exceed 1:48 at the demarcated space.
A5	Are the surfaces stable, firm, and slip resistant? 4.1.2(4), 4.5.1; 502.4, 302.1	Surfaces are rough and deteriorated. Loose gravel and broken asphalt.

C	Exterior Route from Parking to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Multiple changes in level that exceed 1/2 " at route crossing alley.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Multiple gaps that exceed 1/2" at route crossing alley.
C4	Are the route surfaces stable, firm, and slip resistant? 4.3.6, 4.5.1; 302.1	Route crossing alley is rough and has loose paving and gravel.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at alley crossing and at multiple locations along public sidewalk.

D	Polling Place Entrances	Comments
D2	Is the hardware operable (no pinching, twisting or tight grasping required)? 4.13.9; 309.4, 404.2.7	Door has knob hardware.
D4	Is the slope of the door maneuvering space maximum 1:48? 4.13.6; 404.2.4.4, 405.7.1	Slope exceeds 1:48.
D8	Thresholds: maximum 1/2" high? If the height exceeds 1/4”, is it beveled? 4.13.8; 404.2.5	Entry door has a step and change in level that exceed 1/2".

E	Route from Entry to Voting Area	Comments
E8	Interior door(s): 32” minimum width? 4.13.5; 404.2.3	Interior door clear opening width is less than 32”.
E9	Interior door(s): is the hardware operable (no pinching, twisting or tight grasping required)? 4.13.9; 309.4, 404.2.7	Interior door has knob hardware.
E12	Interior door(s): is there 18” clear space on pull side? 4.13.6; 404.2.4	Interior door maneuvering clear space less than 18” on pull side.

Attachment A: ADA Violations Identified During April 2, 2019 Election

Location Name: Woodward Elementary School

Location Address: 725 Bellerive Blvd.

A	Parking	Comments
A1	Is there signage with the ISA and “van accessible”? 4.1.2(5)(b), 4.6.4; 208.2, 208.2.4, 502.6	No signage posted.
A2	Is the van accessible space and aisle either 96” + 96” wide or 130” + 60” wide? 4.1.2(5)(b), 4.6.3; 502.2, 502.3	No van accessible space or aisle demarcation.

C	Exterior Route to Accessible Entrance	Comments
C2	Is the route free of changes in level that exceed 1/2”? 4.3.6, 4.5.2; 303	Change in level that exceeds 1/2" at pedestrian gateway from sidewalk.
C3	Is the route free of openings/gaps that exceed 1/2”? 4.3.6, 4.5.4; 302.3	Gap that exceeds 1/2" at pedestrian gateway from sidewalk.
C10	Is the cross slope 1:48 maximum? 4.3.7; 403.3, 405.3	Cross slopes exceed 1:48 at driveway, pedestrian gateway from sidewalk, the asphalt route to the entry, and concrete path to the entry.

F	Within the Voting Area	Comments
F4	Are there overhanging objects within 80” of the route? 4.4.2; 307.4	Basketball hoop net overhangs space.

Attachment A: ADA Violations Identified During April 2, 2019 Election

The following polling place locations were not accessible on Election Day and cannot be made accessible on Election Day through the use of temporary measures, because they either had stairs to the entrance or stairs inside the entrance to the voting area and no potential alternative entrance or route. Permanent, architectural modifications would need to be made in order for these facilities to be accessible to persons with disabilities. Unless permanent architectural modifications are made, these polling places must be relocated to an accessible location:

Location Name: Berean Seventh Day Adventist Church

Location Address: 1244 N. Union Blvd.

Location Name: Central Baptist Church

Location Address: 2845 Washington Ave.

Location Name: Jesus is All Family Worship Center

Location Address: 1524 East Grand Ave.

Location Name: New Cote Brilliante Church of God

Location Address: 6195 Washington Ave.

Location Name: St. James the Greater Catholic Church

Location Address: 6401 Wade Ave.

Location Name: St. Paul United Church of Christ

Location Address: 3510 Giles Ave.