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MEMORANDUM

PRIVILEGED AND CONFIDENTIAL

ATTORNEY-CLIENT AND

WORK-PRODUCT PRIVILEGED

To: Eduardo Montelongo
Principal Deputy County Counsel
Office of the County Counsel, Los Angeles County

Jonaura Wisdom
Chief Civil Rights Officer
Office of Civil Rights
Los Angeles County Metropolitan Transportation Authority

From: Susan Woolley, Esq.

Re: Los Angeles County Metropolitan Transportation Authority/ [REDACTED]
Investigation of EEO Complaint

Date: March 11, 2020

[REDACTED]

2. Information from Washington

Washington acknowledged that a group called Chicken Bone exists. Washington explained that Chicken Bone is an informal networking group that advocates for infrastructure issues. He said it is not secret and does not exclude Caucasians. He stated that he knows individuals of different races who participate in the group. Washington said the group is men-only, but women can attend receptions and other events. He said the group is considering how to include women in membership.

When told that Loew claimed her Metro career was limited because she could not join Chicken Bone, Washington called the allegation "ridiculous." He said there was no advantage in belonging to Chicken Bone at Metro because other than him, no one else was a member. Washington said that there is no favoritism at Metro related to the group.

Washington said he first learned about Chicken Bone when he started in the transportation profession about twenty years ago. He said there are Chicken Bone members all over the country, and they range from bus operators and mechanics to executives. He said he attends events every two to three years.

[REDACTED]

[REDACTED]

[REDACTED] that
[REDACTED]

When told that the group was termed a “secret society,” ██████ laughed at what ██████ called the “irony” of the statement. ██████ said that Chicken Bone is a networking group, but because it is attended by mostly African Americans, it is termed “secret,” unlike other groups that would simply be called “networking groups.” ██████ said ██████ had never been told that Chicken Bone was secret. (*Investigator’s note:* ██████ did not hesitate to discuss Chicken Bone. ██████ openness about the group refuted the claim that it was “secret.”)

4. Information from Solis

Solis said she knew about Chicken Bone only through what A. Wiggins told her. She said A. Wiggins related that Chicken Bone is a group of African American men who are high-level leaders. She said that the group is limited to African Americans and men, although women are invited to some events. Solis said A. Wiggins sponsored an event in Chicago where men could bring women as guests.

Solis said she does not know what Chicken Bone’s mission is. She said that A. Wiggins told her that members trade off hosting meetings, which take place in homes, restaurants, or other meeting spaces. Solis said that the group did not hold events at Metro facilities. She said she never helped A. Wiggins organize a Chicken Bone meeting and had never attended a gathering of the group, stating that she did not meet the criteria for membership. Solis said she did not know who was in the group, although A. Wiggins told her that Washington had attended an event.

5. Information from ██████

██████ said ██████ heard that Chicken Bone is an offshoot of Yale University’s Skull and Bones Society. ██████ stated that ██████ had been told that Caucasians were not allowed to join the group and that Metro employees belong to the group. When discussing Chicken Bone, ██████ noted, “But this is total hearsay and I have no proof at all,” and “[I]t’s total ... just BS talk. It’s heard. I have no proof at all.”¹⁷²

When asked who told ██████ about Chicken Bone, ██████ initially declined to reveal the individual’s identity but later said Solis told ██████. (*Investigator’s note:* It is notable that ██████ analogized Chicken Bone to Yale’s Skull and Bones Society, a connection that, of the witnesses interviewed, only Loew also made. This fact is some evidence that ██████ also discussed Chicken Bone with Loew.)

¹⁷² ██████ transcript, page 28.