

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**DAVID FIGUEROA BETANCOURT;
MIRTA COLÓN PELLECIER;
BONNELIS CEPEDA; CARLOS MOLINA
ROMAN; URIEL SEPULVEDA ALICEA;
WALBERTO HERNANDEZ REYES**

Plaintiffs

v.

**BANCO POPULAR DE PUERTO
RICO**

Defendant

CIVIL NO.

COMPLAINT

TO THE HONORABLE COURT:

The Plaintiffs, David Figueroa Betancourt; Mirta Colón Pellecier; Bonnelis Cepeda; Carlos Molina; Uriel Sepulveda Alicea and Walberto Hernandez Reyes, on behalf of their own interests, respectfully requests a Permanent Injunction against Banco Popular de Puerto Rico in accordance with Title III of the Americans with Disabilities Act.

I. INTRODUCTION

1. This complaint exposes a stark and systemic pattern of discrimination against persons with disabilities perpetrated by Banco Popular de Puerto Rico throughout its extensive branch network. The evidence reveals what can only be described as two separate standards of accessibility: one for the mainland United States and another, profoundly inadequate one, for Puerto Rico

2. While Banco Popular's Florida branches feature ADA-compliant counters with appropriate heights, adequate depth, and proper knee clearance for wheelchair users, the same institution deliberately maintains inaccessible facilities across Puerto Rico. Transaction counters reaching heights of 49 inches—far exceeding the 36-inch maximum required by law—prevent customers with mobility impairments from conducting basic banking transactions independently. This is not mere oversight but appears to be calculated neglect.
3. The plaintiffs—David Figueroa Betancourt, Mirta Colón Pellecier, Bonnelis Cepeda, Carlos Molina Román, Uriel Sepúlveda Alicea, and Walberto Hernández Reyes—have documented identical accessibility barriers across dozens of branches, revealing a coordinated corporate practice of disregarding ADA requirements specifically in Puerto Rico. The bank's installation of ADA-compliant counters in Florida while simultaneously implementing non-compliant designs in Puerto Rico demonstrates full awareness of legal requirements alongside a deliberate choice to flout them.
4. This case exposes more than isolated accessibility failures—it reveals an institutional policy that treats Puerto Rican customers with disabilities as second-class citizens, worthy of superficial accommodations like disability symbols and designated lines, but denied the fundamental architectural modifications necessary for equal access. This systematic discrimination persists despite Banco Popular's knowledge of ADA standards, proven by their compliance elsewhere, and constitutes an ongoing violation of federal law that demands immediate injunctive relief.

A. Tale of Two Banks: Systematic Discrimination in Puerto Rico

5. Banco Popular presents itself as a single financial institution committed to serving all customers with dignity and respect. However, the reality experienced by persons with disabilities tells a different story—one of two separate and unequal banking systems operating under the same corporate banner.
6. In Florida, wheelchair users approaching Banco Popular counters find surfaces at accessible heights of 36 inches or less, with proper knee clearance and sufficient depth to allow frontal approach—all as required by the Americans with Disabilities Act. Yet across 145 branches in Puerto Rico, these same customers encounter insurmountable barriers in the form of towering counters reaching as high as 49 inches, with no accessible alternatives provided.
7. This disparity cannot be attributed to ignorance. The same corporation that meticulously follows accessibility standards in Florida has made the conscious decision to implement and maintain non-compliant facilities throughout Puerto Rico. During renovations and new construction, when presented with the opportunity to rectify these violations, Banco Popular has repeatedly chosen to install inaccessible counters in its Puerto Rico branches, perpetuating a system that segregates and marginalizes customers with disabilities.
8. The difference is striking and indefensible: mainland customers with disabilities receive banking services in compliance with federal law, while those in Puerto Rico face systematic exclusion from the same corporate entity. This discriminatory treatment extends beyond mere architectural barriers—it represents a fundamental devaluation of the rights and dignity of Puerto Rican customers with disabilities.

B. The Human Cost of Discriminatory Banking Practices

9. Behind the architectural measurements and regulatory citations lie the lived experiences of real people whose basic right to conduct financial transactions has been denied. The plaintiffs in this case represent a cross-section of Puerto Rican society—individuals with various mobility impairments who simply wish to access banking services with the same independence and dignity afforded to customers without disabilities.
10. David Figueroa Betancourt, who has quadriplegia, cannot reach the elevated counters from his wheelchair. Mirta Colón Pellecier, who relies on a motorized wheelchair due to multiple medical conditions, is forced to strain beyond her physical capabilities or rely on others for help with routine transactions. Bonnelis Cepeda, with paralysis in her right hand, finds the counter height exacerbates her challenges with one-handed banking. Carlos Molina Román, who uses a wheelchair due to muscular dystrophy, cannot approach counters with insufficient depth. Uriel Sepúlveda Alicea, dependent on a walker due to spinal conditions, experiences pain when forced to stretch to reach high counters. Walberto Hernández Reyes, wheelchair-bound due to spina bifida and hydrocephalus, finds himself unable to conduct basic transactions without assistance.
11. Each plaintiff has experienced the humiliation of being unable to perform simple banking tasks independently—not because of their disabilities, but because Banco Popular has chosen to maintain inaccessible facilities in Puerto Rico while complying with accessibility standards elsewhere. This differential treatment forces individuals with disabilities to rely on third-party assistance for private financial matters, compromising both their independence and confidentiality.

C. A Pattern of Deliberate Non-Compliance

12. The evidence demonstrates that Banco Popular's non-compliance in Puerto Rico is neither accidental nor isolated. The identical accessibility barriers documented across 145 branches reveal a systematic corporate policy of disregarding ADA requirements specifically within Puerto Rico, despite demonstrating both knowledge and capability of compliance in its mainland operations.
13. Particularly telling is the bank's approach to renovations and new installations. Rather than taking these opportunities to rectify accessibility violations, Banco Popular has consistently chosen to install new counters that perpetuate the same barriers. This pattern of behavior cannot be reconciled with good-faith compliance efforts and instead reveals a deliberate decision to maintain separate accessibility standards based on geographic location.
14. In an apparent attempt to create the illusion of accessibility, Banco Popular has implemented superficial measures such as international disability symbols and designated accessible lines. However, these cosmetic accommodations do nothing to address the fundamental barriers that prevent customers with disabilities from conducting transactions independently. They represent token gestures that mask the underlying discrimination rather than meaningful efforts to provide equal access.

D. Multiple Violations of Federal and Constitutional Law

15. The discriminatory practices documented in this complaint violate not only Title III of the Americans with Disabilities Act but multiple other legal protections afforded to persons with disabilities:

- 15.1. ADA Violations (Title III): By maintaining transaction and customer service counters at heights exceeding 36 inches and without adequate depth for frontal approach, Banco Popular violates the ADA's requirement to remove architectural barriers where readily achievable. The bank's implementation of accessible counters in Florida proves both awareness of these requirements and the feasibility of compliance.
- 15.2. Puerto Rico Constitutional Violations: These practices violate Article II, Sections 1 and 7 of the Puerto Rico Constitution, which guarantee human dignity, equality before the law, and freedom from discrimination based on physical condition.
- 15.3. Fair Housing Act Violations: By preventing accessibility to mortgage services, Banco Popular discriminates against persons with disabilities in housing-related transactions, violating 42 U.S.C. § 3604(f)(2).
- 15.4. Equal Credit Opportunity Act Violations: The inaccessible counters effectively prevent persons with disabilities from applying for or accessing credit on equal terms, violating 15 U.S.C. § 1691(a)(1).
- 15.5. Breach of Contract: For plaintiff-customers, Banco Popular has breached explicit and implicit contractual obligations to provide equal access to banking services without discrimination.
- 15.6. Pattern or Practice of Discrimination: The systemic nature of these violations across 145 branches, coupled with the contrasting compliance in Florida branches, establishes a pattern of intentional discrimination specifically targeting persons with disabilities in Puerto Rico.

E. Comprehensive Remedies Sought

16. The plaintiffs seek comprehensive remedies to address both the immediate accessibility barriers and the underlying discriminatory practices:
 - 16.1. Architectural Modifications: Lower all counters to a maximum height of 36 inches, ensure minimum depth of 30 inches, provide proper knee clearance, and install continuous lowered sections across all Banco Popular branches in Puerto Rico.
 - 16.2. Implementation Timeline: Complete all required modifications within 180 days, with progress reports every 60 days and certification upon completion.
 - 16.3. Policy Changes: Develop written accessibility standards, implement compliance review procedures, and establish formal processes for addressing accessibility complaints.
 - 16.4. Staff Training: Conduct comprehensive ADA training for all branch personnel and implement specific protocols for assisting customers with disabilities.
 - 16.5. Verification Measures: Submit to inspection by court-appointed experts and allow periodic audits to ensure ongoing compliance.
 - 16.6. Financial Compensation: Payment of attorneys' fees, litigation costs, and nominal damages to plaintiffs.
 - 16.7. Future Compliance: Apply identical accessibility standards to all future renovations and conduct annual ADA compliance audits.
 - 16.8. Court Oversight: Retention of jurisdiction to enforce compliance, with potential for closure of non-compliant facilities if discrimination persists.

17. These remedies aim not only to correct the specific architectural barriers identified but to address the systemic discrimination that has allowed such widespread violations to persist. The goal is to ensure that Banco Popular maintains a single standard of accessibility for all customers, regardless of geographic location.
18. This case is fundamentally about equal treatment under the law. Banco Popular cannot maintain two separate standards of accessibility—one for mainland customers and an inferior one for Puerto Ricans. The evidence demonstrates not only widespread ADA violations but a deliberate corporate policy of treating Puerto Rican customers with disabilities as less deserving of accessibility accommodations than their mainland counterparts.
19. The plaintiffs seek not special treatment but the basic dignity of conducting their banking transactions independently, as the law guarantees. Through this action, they challenge a financial institution's practice of systematic discrimination and seek to establish that ADA compliance is not optional or discretionary based on geography but a fundamental legal obligation owed equally to all customers with disabilities.
20. The Court is therefore asked to intervene and order the comprehensive remedies outlined in this complaint, sending a clear message that maintaining two separate standards of accessibility—one ADA-compliant and one not—is unacceptable under federal law and the Constitution of Puerto Rico.

II. PARTIES

21. The plaintiffs are as follows:
 - 21.1. Plaintiff David Figueroa Betancourt is a resident of the Municipality of Carolina.
 - 21.2. The plaintiff's name is Mirta Colón Pellecier and she is a resident of the Municipality of San Juan.

- 21.3. The plaintiff's name is Bonnelis Cepeda, and he is a resident of the Municipality of Canovanas.
- 21.4. The plaintiff's name is Carlos Molina and he is a resident of the Municipality of Cidra.
- 21.5. The plaintiff's name is Uriel Sepúlveda Alicea, and he is a resident of the Municipality of Ponce.
- 21.6. The plaintiff's name is Walberto Hernandez Reyes and he is a resident of the Municipality of Comerio.
- 22. The Defendant's name is Banco Popular de Puerto Rico. The Defendant is the owner, lessor, lessee, and/or operator of the locations where each of Banco Popular's branches, as identified in Section B of this Complaint, are located.

III. ALLEGATIONS

A. Regarding the Plaintiffs' Medical Conditions and Their Relationship with Banco Popular

- 23. Mr. David Figueroa has a mobility impairment due to his quadriplegia:
 - 23.1. Due to his quadriplegia, Mr. David Figueroa has severely limited motor function and muscle control in his limbs, preventing him from bearing weight on his legs or walking independently. As a result, he must rely on a wheelchair for mobility to perform daily activities and navigate his surroundings.
 - 23.2. As stated, these conditions or 'impairments' substantially limit Mr. David Figueroa, compared to the general population, in the following major life activities: walking, standing, lifting objects, bending, working, among others.
 - 23.3. Mr. David Figueroa is a client of Banco Popular.

24. Mrs. Mirta Colón has a mobility impairment due to severe arthritis, COPD (chronic obstructive pulmonary disease), type 2 diabetes, hypertension, sleep apnea, venous thrombosis, and generalized diabetic neuropathy:
 - 24.1. Mrs. Colón's conditions collectively and profoundly restrict her mobility and significantly impact her ability to perform daily activities.
 - 24.2. The combination of severe arthritis and diabetic neuropathy causes chronic pain, numbness, and reduced strength in her extremities, making it impossible for her to walk or stand even for short periods. Additionally, her COPD and sleep apnea further compromise her respiratory function, requiring her to use portable oxygen at all times to maintain stable oxygen levels. The venous thrombosis exacerbates swelling and discomfort in her legs, further limiting her ability to move freely.
 - 24.3. Due to these conditions, she must rely on a motorized wheelchair to maintain her independence and carry out essential tasks such as shopping, attending medical appointments, and managing her household. Despite these significant physical limitations, the use of assistive devices and medical interventions allows her to retain a degree of autonomy and ensure a basic quality of life.
 - 24.4. Mrs. Mirta Colón is a client of Banco Popular.
25. Mrs. Bonnelis Cepeda has a disability that significantly impacts her ability to perform daily activities. She has permanent paralysis in her right hand as a result of a cerebrovascular incident, which has caused a substantial loss of strength, dexterity, and motor function:
 - 25.1. Due to this condition, Mrs. Cepeda faces considerable challenges in tasks that require the use of both hands, such as gripping, lifting, or manipulating objects.

Simple activities, such as opening doors, carrying items, or performing fine motor tasks, are difficult for her and often require alternative methods or assistance.

25.2. Her limited hand mobility also affects her ability to perform essential daily tasks independently, including personal care, household chores, and other activities that require coordination and precision. These challenges create a need for accessible environments that accommodate her disability and reduce physical strain.

25.3. Mrs. Bonnelis Cepeda is a client of Banco Popular.

26. Mr. Carlos Molina Román has a severe mobility impairment due to muscular dystrophy, a progressive condition that causes significant muscle weakness and loss of function:

26.1. Over time, this condition has deteriorated his muscle strength, making it impossible for him to walk or stand. As a result, he must rely on a wheelchair as his primary means of mobility to navigate his surroundings and carry out daily activities.

26.2. Muscular dystrophy has profoundly impacted his independence by limiting his ability to perform basic physical tasks that require muscle control and endurance. He faces significant challenges in transferring between surfaces, maintaining posture, and engaging in activities that require upper or lower body strength. Additionally, he has oculocutaneous albinism, which affects his vision and adds further challenges to his daily life.

26.3. Due to these limitations, he depends on assistive devices and accommodations to move safely and complete essential daily tasks. Despite these challenges, Mr. Molina Román remains determined to maintain his independence and quality of

life through the use of mobility aids and adaptive strategies that allow him to navigate his environment as effectively as possible.

26.4. Mr. Carlos Molina is a client of Banco Popular.

27. Mr. Uriel Sepúlveda Alicea has a severe mobility impairment due to multiple chronic conditions, including a damaged disc in his lumbar spine, bilateral cervical and lumbar radiculopathy, osteoporosis, and chronic osteoarthritis in his spine and sacroiliac joints:

27.1. Mr. Sepúlveda's conditions cause him significant pain, weakness, and instability, severely limiting his ability to move and perform basic physical activities.

27.2. As a result of these conditions, Mr. Sepúlveda experiences substantial mobility limitations compared to the average person in the general population. Walking even short distances without assistance or rest is extremely difficult due to the pain and weakness caused by his lumbar disc damage and bilateral radiculopathy. Additionally, chronic osteoarthritis and osteoporosis further compromise his spine's stability and flexibility, making it impossible for him to bend, twist, or lift objects beyond a minimal weight.

27.3. Everyday activities such as climbing stairs, standing for extended periods, or even sitting without proper lumbar support are particularly challenging for him, as they intensify his pain and increase his risk of further injury. Due to these limitations, Mr. Sepúlveda must rely on a walker for mobility, ensuring he can move as safely and independently as possible despite his significant physical challenges.

27.4. Mr. Uriel Sepúlveda is not currently a client of Banco Popular, but he wants to become one due to the institution's strong reputation and long-established presence. What started as a small bank has grown into a major financial institution

with operations across the United States, the Caribbean, and Latin America. Unlike other options in the market, Banco Popular distinguishes itself through its innovation, highly skilled team of professionals, and extensive range of financial products and services.

- 27.5. Despite his strong interest in becoming a client, Mr. Sepúlveda has been effectively prevented from doing so due to the known presence of architectural barriers at Banco Popular's facilities. As an individual with mobility impairments, he has refrained from attempting to visit these locations, recognizing that the existing barriers render them inaccessible to him. These obstacles have deterred him from seeking in-person services, as they subject him to undue hardship, discomfort, and an unequal customer experience
- 27.6. The existing architectural barriers make it impossible for him to access the bank like any other potential client, placing an unfair and unnecessary restriction on his ability to manage his finances with Banco Popular. Due to these circumstances, despite his willingness to take advantage of the bank's services, he remains unable to become a client. The bank's lack of accessibility not only affects him personally but also highlights broader concerns about inclusivity and equal access to financial services for Mr. Uriel.
28. Mr. Walberto Hernández Reyes has multiple medical conditions that significantly impact his mobility and overall health. He has lived with spina bifida and hydrocephaly since birth and also suffers from kidney damage, epilepsy, high blood pressure, and asthma. Additionally, he has a shunt in his head to manage his hydrocephaly:

- 28.1. As a result of these conditions, Mr. Hernández Reyes experiences substantial mobility limitations compared to the average person in the general population. His spina bifida and hydrocephaly have caused a severe loss of mobility, making it necessary for him to rely on a wheelchair for movement. Furthermore, his asthma prevents him from engaging in sudden or strenuous physical activities, as it can lead to shortness of breath and hyperventilation, further restricting his ability to move freely.
- 28.2. Due to these limitations, Mr. Hernández Reyes depends on his wheelchair as his primary means of mobility to navigate his environment and perform daily activities as independently as possible.
- 28.3. Mr. Walberto Hernandez is a client of Banco Popular.

B. Concerning the Properties in Question and the Court's Jurisdiction

29. The properties in question are public accommodations known as Banco Popular. Specifically, the properties at issue consist of the various Banco Popular branches, which are as follows:

ADJUNTAS

- 29.1. Banco Popular – Adjuntas (hereinafter Branch Adjuntas) located at Street San Joaquín 19-21, Adjuntas, PR 00601-0000, with coordinates 18.16240302361871, -66.72359159694086.

AGUADA

- 29.2. Banco Popular – Aguada (hereinafter Branch Aguada) located at Ave. Nativo Alers, Desvio Sur, Aguada, PR 00602-0000, with coordinates 18.3777242342952, -67.19014791018773.

AGUADILLA

- 29.3. Banco Popular – Ramey (hereinafter Branch Ramey) located at 17 West Parade, Antigua Base Ramey, Aguadilla, PR 00604-0000, with coordinates 18.50101977269135, -67.13768048483097.
- 29.4. Banco Popular – Aguadilla Sur (hereinafter Branch Aguadilla Sur) located at Street 2 Km. 129.2, Bo. Victoria, Aguadilla, PR 00603-0000, with coordinates 18.410530456305906, -67.15325806768553.

AGUAS BUENAS

- 29.5. Banco Popular – Aguas Buenas (hereinafter Branch Aguas Buenas) located at Street Muñoz Rivera 20, Aguas Buenas, PR 00703-0000, with coordinates 18.139245330231414, -66.21819090095875.

AIBONITO

- 29.6. Banco Popular - Aibonito (hereinafter Branch Aibonito) located at Street Muñoz Rivera 20, Aguas Buenas, PR 00786-0000, with coordinates 18.139260800901777, -66.21818894904175

AÑASCO

- 29.7. Banco Popular – Añasco (hereinafter Branch Añasco) located at Street 2 Km. 143.3, Esq. Street 402, Bo. Caracol, Añasco, PR 00610-0000, with coordinates 18.299210021077815, -67.15791137671155.

ARECIBO

- 29.8. Banco Popular – Arecibo Aeropuerto (hereinafter Branch Arecibo Aeropuerto) located at Street 2 Km. 69.8, Bo. Santana, Arecibo, PR 00612-0000, with coordinates 18.44797588833562, -66.67687899273035.

- 29.9. Banco Popular – Arecibo San Luis (hereinafter Branch Arecibo San Luis) located at Ave. San Luis 614, Arecibo, PR 00612-0000, with coordinates 18.469002589146122, -66.73083566813914.

ARROYO

- 29.10. Banco Popular – Arroyo (hereinafter Branch Arroyo) located at Street 753, Esq. Street 3, Arroyo, PR 00714-0000, with coordinates 17.975008939191227, -66.05806095853262.

BARCELONETA

- 29.11. Banco Popular – Barceloneta Prime Outlets (hereinafter Branch Barceloneta Prime Outlets) located at Barceloneta Prime Outlets Shopping Center, Street 2, Km. 54.8 & PR 140, Barceloneta, PR 00617-0000, with coordinates 18.437850410515882, -66.54243958805901.

- 29.12. Banco Popular – Cruce Davila (hereinafter Branch Cruce Davila) located at Street 2 Km. 57.3, Bo. Cruce Davila, Barceloneta, PR 00617-0000, with coordinates 18.432023476949194, -66.56095154725526.

BARRANQUITAS

- 29.13. Banco Popular – Barranquitas (hereinafter Branch Barranquitas) located at San Cristobal Mall, Street 156 Km. 7.1, Barranquitas, PR 00794-0000, with coordinates 18.183330313084237, -66.29793039350524.

BAYAMÓN

- 29.14. Banco Popular – Lomas Verdes (hereinafter Branch Lomas Verdes) located at Ave. Lomas Verdes Sur, Urb. Royal Palm 1-A-100, Bayamón, PR 00956-0000, with coordinates 18.382794500492384, -66.14446411144742.

- 29.15. Banco Popular – Santa Rosa (hereinafter Branch Santa Rosa) located at Santa Rosa Shopping Center, Street 2, Bayamón, PR 00959-0000, with coordinates 18.394738666512175, -66.14572981741595.
- 29.16. Banco Popular – Bayamon Center (hereinafter Branch Bayamon Center) located at Centro Comercial Plaza del Sol, Ave. West Main 725, Sierra Bayamon, Bayamón, PR 00959-0000, with coordinates 18.39198295807162, -66.15773672831416.
- 29.17. Banco Popular – Plaza Del Sol (hereinafter Branch Plaza Del Sol) located at Centro Comercial Plaza del Sol, Ave. West Main 725, Sierra Bayamon, Bayamón, PR 00961-0000, with coordinates 18.406700787231728, -66.16412701663764.
- 29.18. Banco Popular – Rio Hondo (hereinafter Branch Rio Hondo) located at Rio Hondo Shopping Center, Ave. Comerio, Bayamón, PR 00957-0000, with coordinates 18.42194965064482, -66.1636785836967.
- 29.19. Banco Popular – Rexville Town Center (hereinafter Branch Rexville Town Center) located at 3011 Street 167 Km. 0.60, Bayamón, PR 00956-0000, with coordinates 18.36144722442565, -66.1889525358584.
- 29.20. Banco Popular – Bayamon Oeste (hereinafter Branch Bayamon Oeste) located at Bayamon Oeste Shopping Center, Street 2 Km. 14.8, Bayamón, PR 00961-0000, with coordinates 18.40850094679104, -66.18791400723094.

CABO ROJO

- 29.21. Banco Popular – Cabo Rojo La Hacienda (hereinafter Branch Cabo Rojo La Hacienda) located at Street 100 Km 7.5, Bo. Miradero, Cabo Rojo, PR 00623-0000, with coordinates 18.088762361848804, -67.15660295151639.

CAGUAS

- 29.22. Banco Popular – Condadito (hereinafter Branch Condadito) located at Street Amapola 14, Urb. Condadito, Caguas, PR 00725-0000, with coordinates 18.236911103796903, -66.02636871762745.
- 29.23. Banco Popular – Plaza Centro Sur (hereinafter Branch Plaza Centro Sur) located at Plaza Centro II, 200 Rafael Cordero Ave. Ste. 151, Caguas, PR 00725-0000, with coordinates 18.24746281137426, -66.0250079755149.
- 29.24. Banco Popular – Caguas Pueblo (hereinafter Branch Caguas Pueblo) located at Street Muñoz Rivera 20, Esq. Ruiz Belvis, Caguas, PR 00725-0000, with coordinates 18.235419270087284, -66.03566421537187.
- 29.25. Banco Popular – Ralph Food Warehouse Bairoa (hereinafter Branch Ralph Food Warehouse Bairoa) located at Marginal P-1 Street 10, Bo. Bairoa, Caguas, PR 00725-0000, with coordinates 18.251757172130777, -66.03482450025152.
- 29.26. Banco Popular – San Alfonso (hereinafter Branch San Alfonso) located at Plaza San Alfonso Street 1, Ave. Degetau, Esq. Gautier Benitez, Caguas, PR 00725-0000, with coordinates 18.222905251594582, -66.04010870688319.
- 29.27. Banco Popular – Las Catalinas (hereinafter Branch Las Catalinas) located at Las Catalinas Mall, Bo. Bairoa Street 156 Km. 0.2, Caguas, PR 00725-0000, with coordinates 18.240906064643497, -66.03841806871412.
- 29.28. Banco Popular – Plaza Los Prados (hereinafter Branch Plaza Los Prados) located at Street PR 156 Km. 56.3, Caguas, PR 00727-0000, with coordinates 18.233966695646497, -66.05890713923766.

CAMUY

- 29.29. Banco Popular – Camuy (hereinafter Branch Camuy) located at 160 Ave. Muñoz Rivera Oeste, Camuy, PR 00627-0000, with coordinates 18.483434977313834, -66.84793622706727.

CANOVANAS

- 29.30. Banco Popular – Canovanas Outlet (hereinafter Branch Canovanas Outlet) located at Canovanas Outlet, Street 3 Km.18.4, Canóvanas, PR 00729-0000, with coordinates 18.374525619967237, -65.88464176217069.

CAROLINA

- 29.31. Banco Popular – Los Colobos Shopping Center (hereinafter Branch Los Colobos Shopping Center) located at Street 3 Km. 15.2, Bo. Canovanillas, Carolina, PR 00987-0000, with coordinates 18.376495328912924, -65.91979571424841.
- 29.32. Banco Popular – Carolina Highway (hereinafter Branch Carolina Highway) located at Ave. 65 de Infanteria, Esq. Street Ignacio Arzuaga Km. 10.3, Carolina, PR 00985-0000, with coordinates 18.380765587899262, -65.96216669499726.
- 29.33. Banco Popular – Plaza Carolina (hereinafter Branch Plaza Carolina) located at Exp. Loiza, Salida Ave. Fragoso, Ruta 26, Carolina, PR 00983-0000, with coordinates 18.393061847367836, -65.97605438917095.
- 29.34. Banco Popular – Campo Rico (hereinafter Branch Campo Rico) located at Ave. Roberto Sanchez Vilella (Antes Ave. Campo Rico), Esq. Expreso Loiza, Carolina, PR 00928-0000, with coordinates 18.41662282330509, -65.988872989182.

29.35. Banco Popular – Parque Escorial (hereinafter Branch Parque Escorial) located at Centro Comercial Parque Escorial, 65 de Infanteria Km. 5, Carolina, PR 00917-0000, with coordinates 18.394477552830384, -66.00026598315822.

29.36. Banco Popular – Isla Verde (hereinafter Branch Isla Verde) located at Ave. Baldorioty de Castro, Esq. Street 6, Carolina, PR 00913-0000, with coordinates 18.443604392443564, -66.02769005965571.

CAYEY

29.37. Banco Popular – Cayey Montellano (hereinafter Branch Cayey Montellano) located at Street 1 Km. 56.6, Bo. Montellanos, Cayey, PR 00736-0000, with coordinates 18.116010777983526, -66.14658711946055.

29.38. Banco Popular – Walmart Cayey (hereinafter Branch Walmart Cayey) located at Street 1 Km. 54.9, Bo. Montellano, Cayey, PR 00736-0000, with coordinates 18.12277650855997, -66.13409773132675.

CEIBA

29.39. Banco Popular – Ceiba (hereinafter Branch Ceiba) located at Ave. Lauro Piñero 248, Ceiba, PR 00735-0000, with coordinates 18.265110748148924, -65.64731243123117.

CIALES

29.40. Banco Popular – Ciales (hereinafter Branch Ciales) located at Street Palmer 46 A, Ciales, PR 00638, with coordinates 18.334477155189617, -66.46803049869632.

CIDRA

- 29.41. Banco Popular – Cidra (hereinafter Branch Cidra) located at 60 Street Barcelo, Esq. Jaime Bonet, Cidra, PR 00739-0000, with coordinates 18.17638513443423, -66.15933011161297.

COAMO

- 29.42. Banco Popular – Coamo (hereinafter Branch Coamo) located at Street Mario Brashi , 7 Bajos, Coamo, PR 00769, with coordinates 18.081176384908744, -66.35612888150412.

COMERÍO

- 29.43. Banco Popular – Comerío (hereinafter “Branch Comerío”) located at 57 Street Gerardo Nieves Mercado, Comerío, PR 00782-0000, with coordinates 18.226465640220113, -66.21082948465744.

COROZAL

- 29.44. Banco Popular – Corozal (hereinafter Branch Corozal) located at Corozal Plaza Shopping Center, Street 159 Km. 15.1, Corozal, PR 000783-0000, with coordinates 18.34226598308802, -66.31096798890248.

DORADO

- 29.45. Banco Popular – Plaza Dorada (hereinafter Plaza Dorada) located at Plaza Dorada Street 693 KM 8.5, Bo Higuillar Ave. Jesús Efrón, Dorado, PR 00646 - 0000, with coordinates 18.465690323097462, -66.2822282023955.

FAJARDO

- 29.46. Banco Popular – Fajardo (hereinafter Branch Fajardo) located at Ave. Garrido Morales Final, Street 3, Fajardo, PR - 00738- 0000, with coordinates 18.3265450705062, -65.6549028852033.

FLORIDA

- 29.47. Banco Popular – Florida (hereinafter Branch Florida) located at Street Muñoz Rivera 225, Florida,, PR 00650 - 0000, with coordinates 18.363315858886676, -66.56664627540944.

GUAYAMA

- 29.48. Banco Popular – Guayama Mall (hereinafter Branch Guayama Mall) located at Street 3 Km. 134.9, Ave. Los Veteranos, Guayama, PR 00784 - 0000, with coordinates 17.98459459947293, -66.11339580239552.

GUAYANILLA

- 29.49. Banco Popular – Guayanilla (hereinafter Branch Guayanilla) located at Street Muñoz Rivera 38-40, Guayanilla, PR 00656-0000, with coordinates 18.019043351334, -66.79103027725904.

GUAYNABO

- 29.50. Banco Popular - Plaza Guaynabo (hereinafter “Branch Plaza Guaynabo”) Plaza Guaynabo Shopping Center, Expreso Martínez Nadal, Street #20, Guaynabo, PR 00969-0000, with coordinates 18.369028439538333, -66.10972220340119.
- 29.51. Banco Popular - San Patricio Gallery (hereinafter "Branch San Patricio Gallery"), located at Ave. Gonzalez Giusti, Bloque 9 B-10, Guaynabo, PR 00968-3033, whose coordinates are 18.406367557620023, -66.10564011444073.
- 29.52. Banco Popular - San Patricio Mall (hereinafter "Branch San Patricio Mall"), located at San Patricio Shopping Center, 1er Nivel, Guaynabo, PR 00968-0000, whose coordinates are 18.409199818144028, -66.1056341.
- 29.53. Banco Popular - Expreso Garden Hills (hereinafter "Branch Expreso Garden Hills"), located at Garden Hills Plaza, Street 19, Int. Ave. Ramirez de Arellano,

Guaynabo, PR 00966-3133, whose coordinates are 18.40065604697164, -66.10863824417923.

29.54. Banco Popular - Valencia Park (hereinafter "Branch Valencia Park"), located at Edif. Telefónica Larga Distancia, Street 165 Lote 1, Guaynabo, PR 00968-8034, whose coordinates are 18.417122165905027, -66.10933261534338.

29.55. Banco Popular - Guaynabo Las Cumbres (hereinafter "Branch Guaynabo Las Cumbres"), located at Jardines Reales Shopping Center, Ave. Las Cumbres, Int. Juan Carlos de Borbon, Bo. Santa Rosa, Guaynabo, PR 00969-4802 whose coordinates are 18.36280635074432, -66.11952998835848.

GURABO

29.56. Banco Popular – Gurabo (hereinafter Branch Gurabo) located at Street Andres Aruz Rivera 250-E, Gurabo, PR 00778 -0000, with coordinates 18.25432017283519, -65.96794989869633.

HATILLO

29.57. Banco Popular – Hatillo (hereinafter Branch Hatillo) located at Street 2 Km. 86.6, Bo. Pueblo, Hatillo, PR 00659-0000, with coordinates 18.48773394074449, -66.81282315081889.

HORMIGUEROS

29.58. Banco Popular – Hormigueros (hereinafter Branch Hormigueros) located at Plaza Peregrinos, Street 2 Km. 164.5, Bo. Lavadero, Hormigueros, PR 00660-0000, with coordinates 18.133787933418645, -67.11202931773813.

HUMACAO

- 29.59. Banco Popular – Palmas del Mar (hereinafter Branch Palmas del Mar) located at Palmanova Plaza, Humacao, PR 00791-0000, with coordinates 18.08261448361325, -65.79831013547627.
- 29.60. Banco Popular – Palma Real (hereinafter Branch Palma Real) located at Street 3 KM 78.10, Lote OP 4 Humacao, PR 00791-0000, with coordinates 18.146867492796638, -65.8153977576713.
- 29.61. Banco Popular – Humacao Este (hereinafter Branch Humacao Este) located at Triumph Plaza, Lote 6, Street 3, Humacao, PR 00791-0000, with coordinates 18.147862939287233, -65.81675237725904.

ISABELA

- 29.62. Banco Popular - Branch Isabela (hereinafter Branch Isabela) located at Isabela Barrio Mora Plaza, Street #4494 East Km.1 Int. Street#2, Isabela, PR 00662-0000, with coordinates 18.471972892303643, -67.0240318219477.

JAYUYA

- 29.63. Banco Popular - Branch Jayuya (hereinafter Branch Jayuya) located at Street Guillermo Esteves 84, Jayuya, PR 00664-0000 with coordinates 18.218549880240175, -66.59197526522172.

JUANA DIAZ

- 29.64. Banco Popular - Branch Juana Diaz (hereinafter Branch Juana Diaz) located at Street 149 Km.67.1, Bo. Amuelas, Juana Díaz, PR 00795-0000 with coordinates 18.041881283223667, -66.50972325514728

JUNCOS

- 29.65. Banco Popular - Juncos (hereinafter “Branch Ralph Food Warehouse Juncos”) Urb. Valencia 2, Street Santiago, Fernandez 20, Juncos, PR 00777-0000 with coordinates 18.22564807938164, -65.91572422014374.

LAJAS

- 29.66. Banco popular - Branch Las Lajas (hereinafter Branch “Las Lajas”) located at Street 65 Infantería 34, Lajas, PR 00667-0000, with coordinates 18.047516306267948, -67.05946326036964.

LARES

- 29.67. Banco Popular- Lares (hereinafter “Branch Lares”) located at Ave. Patriotas , 562, Lares, PR 00669-0000, with coordinates 18.292138027317137, -66.88513038650692.

LAS PIEDRAS

- 29.68. Banco Popular- Las Piedras (hereinafter “Branch Las Piedras”) located at Street 183 Km. 21.1, Las Piedras, PR 00771-0000, with coordinates 18.17660729748193, -65.87325025309529.

LOAIZA

- 29.69. Banco Popular- Loiza (hereinafter “Branch Loiza”) located at Street San Patricio 64, Loíza, PR 00772-0000, with coordinates 18.432317204448765, -65.87968088468394.

LUQUILLO

- 29.70. Banco Popular- Luquillo (hereinafter “Branch Luquillo”) located at Condominio Playa Azul, Street 193 Esq. Street B, Luquillo, PR 00773-0000, with coordinates 18.37972610978809, -65.7203426425074.

MANATI

- 29.71. Banco Popular- Manati Popular Center 1 (hereinafter “Branch Manati Popular Center 1”) located at Monte Real Shopping Center, Street 2 km 45.6, Space #5, Manatí, PR 00674-0000, with coordinates 18.438927193478793, -66.4581448932073.
- 29.72. Banco Popular- Econo Manati (hereinafter “Branch Econo Manati”) located at Street 670 Km. 1.1, Cordova Davila, Manatí, PR 00674-0000, with coordinates 18.42364897105628, -66.48296139129778.

MARICAO

- 29.73. Banco Popular- Maricao (hereinafter “Branch Maricao”) located at Baldorioty 4, Esq. Street Zuzuaregui, Maricao, PR 00606-0000, with coordinates 18.181187382905975, -66.97976546011449.

MAUNABO

- 29.74. Banco Popular- Maunabo (hereinafter “Branch Maunabo”) located at Street Santiago Iglesia 1, Maunabo, PR 00707-0000, with coordinates 18.00753569519929, -65.89978062879237.

MAYAGUEZ

- 29.75. Banco Popular – Mayaguez Mall Centro (hereinafter Sucursal “Mayaguez Mall Centro”) located at Centro Comercial Mayaguez Mall, 975 Ave. Hostos, Suite 290, Mayagüez, PR 00680-0000, with coordinates 18.156256539034054, -67.14512939437704.
- 29.76. Banco Popular – Mayaguez Mall Sur (hereinafter “Branch Mayaguez Mall Sur”) located at Centro Comercial Mayaguez Mall , 975 Ave. Hostos, Suite 2000,

Mayagüez, PR 00680-0000, with coordinates 18.157397821098183, -67.14167861949939.

29.77. Banco Popular – Mendez Vigo Mayaguez (hereinafter “Branch Mendez Vigo Mayaguez”) located at Mendez Vigo 15 Oeste, Mayagüez, PR 00680-0000, with coordinates 18.201990282957482, -67.14187514738072.

29.78. Banco Popular – UPR Mayaguez (hereinafter “Branch UPR Mayaguez”) located at Edif. Centro de Estudiantes Bajos, 259 Carr 2 Esq. Street Post Norte, Mayagüez, PR 00680-0000, with coordinates 18.210365528318494, -67.14100390990542.

29.79. Banco Popular – Mayaguez Suau (hereinafter “Branch Mayaguez Suau”) located at 1 Street Suau, Mayagüez, PR 00680-0000, with coordinates 18.203882037819653, -67.1458243384135.

MOCA

29.80. Banco Popular – Moca (hereinafter “Branch Moca”) located at Street Jose Calazan 108, Moca, PR 00676-0000, with coordinates 18.39606771035527, -67.11401294981157.

MOROVIS

29.81. Banco Popular – Morovis (hereinafter “Branch Morovis”) located at Street PR 155, Int. Street PR 6623, Morovis Sur, Morovis, PR 00687-0000, with coordinates 18.322991636555706, -66.40610632945524.

NAGUABO

- 29.82. Banco Popular- Naguabo (hereinafter “Branch Naguabo”) located at Street Juan R. Garzot 19, Esq. Muñoz Rivera, Naguabo, PR 00718-0000, with coordinates 18.211736058306546, -65.73619647116433.

NARANJITO

- 29.83. Banco Popular - El Mercado Plaza (hereinafter “Branch El Mercado Plaza”) Street 152 Km. 14.6, Bo. Cedro Arriba, Naranjito, PR 00719-0000, with coordinates 18.272546963053536, -66.27305947301383.

OROCOVIS

- 29.84. Banco Popular - Orocovis (hereinafter “Branch Orocovis”), located at Street 155 Km. 24.5, Orocovis, PR 00720-0000, with coordinates 18.226831712240195, -66.39254239329883.

PATILLAS

- 29.85. Banco Popular - Patillas (hereinafter “Branch Patillas”), located at Muñoz Rivera 33, Esq. Iglesias, Patillas, PR 00723-0000, with coordinates 18.00515502360958, -66.01451312622581.

PEÑUELAS

- 29.86. Banco Popular - Peñuelas (hereinafter “Branch Peñuelas”) located at Street Luis Muñoz Rivera, 318, Peñuelas, PR 00624-0000, with coordinates 18.005314284499924, -66.01454646705021.

PONCE

- 29.87. Banco Popular - Ponce El Monte (hereinafter "Branch Ponce El Monte"), located at Monte Town Center, Street #14 Km 6.0, Ponce, PR 00780-2406, whose coordinates are 18.041986837860644, -66.57825247301507.

- 29.88. Banco Popular - Ponce Rambla (hereinafter "Branch Ponce Rambla"), located at La Rambla Shopping Center, Ave. Tito Castro, Street 14, Ponce, PR 00716-0200, whose coordinates are 18.02594784241482, -66.599223
- 29.89. Banco Popular - Centro del Sur Mall (hereinafter "Branch Centro del Sur Mall"), located at Ave. Boulevard, Miguel Pou 1497, Centro del Sur Mall, Ponce, PR 00730-1696, whose coordinates are 18.012324278612418, -66.60137674603017.
- 29.90. Banco Popular - Plaza del Caribe (hereinafter "Branch Plaza del Caribe"), located at 2050 Ponce ByPass, Plaza del Caribe, Segundo Nivel Suite 420, Ponce, PR 00716-1911, whose coordinates are 17.99232395012243, -66.61121952698493.
- 29.91. Banco Popular – Ponce Plaza (hereinafter Branch Ponce Plaza) located at Edificio Ponce Plaza, Plaza Degetau, Esq. Street Comercio, Ponce, PR 00731-0000, with coordinates 18.011065069111417, -66.6133640646503.
- 29.92. Banco Popular – Ponce Towne Center Sur (hereinafter Branch Ponce Towne Center Sur) located at Ave. Baldorioty de Castro, Esq. Street 6, Carolina, PR 00913-0000, with coordinates 17.996486501393615, -66.63698528020593.

QUEBRADILLAS

- 29.93. Banco Popular – Quebradillas (hereinafter “Branch Quebradillas”) located at 108 Street Honorio Hernandez, Quebradillas, PR 00678-1716, with coordinates 18.474034979226815, -66.93810331534256.

RINCON

- 29.94. Banco Popular-Rincón (hereinafter Branch Rincon) located at Street 115 Km. 12.4, Street Albizu Campos, Bo. Pueblo, Rincón, PR 00677-0000, with coordinates 18.330220208496858, -67.24869531350626.

RIO GRANDE

- 29.95. Banco Popular-Plaza del Yunque (hereinafter Branch Plaza del Yunque), located at Street Estatal 3 Km. 22.2, Río Grande, PR 00745-0000, with coordinates 18.378315228694916, -65.84020020123623.
- 29.96. Banco Popular-Río Grande Pueblo (hereinafter Branch Río Grande Pueblo), located at Villas de Río Grande Shopping Center, Street Pimental 99, Río Grande, PR 00745-0000, with coordinates 18.37989209076197, -65.83385932944583.

SABANA GRANDE

- 29.97. Banco Popular-Sabana Grande (hereinafter Branch Sabana Grande), located at 8 Av. Vicente Quilinchini, Sabana Grande, 00637-0000, PR, with coordinates 18.075784281939395, -66.95994453677993.

SALINAS

- 29.98. Banco Popular-Salinas (hereinafter Branch Salinas) located at Street Muñoz Rivera 1, Salinas, PR 00751-0000, with coordinates 17.976435149911833, -66.2986262392729.

SAN GERMÁN

- 29.99. Banco Popular-San Germán (hereinafter Branch San Germán), located at Street 2 Ave. Casto Pérez, Plaza del Oeste, Shopping Center, San Germán, PR 00683-0000, with coordinates 18.08119268392438, -67.04158165767132.

SAN JUAN

- 29.100. Banco Popular – Caparra Center (hereinafter Branch Caparra Center) located at 1451 Avenida F.D. Roosevelt, San Juan, PR 00920-0000, with coordinates 18.413606817321536, -66.09716132945363.

- 29.101. Banco Popular – Mall of San Juan (hereinafter Branch Mall of San Juan) located at 1000 The Mall of San Juan Boulevard, Store 131A, San Juan, PR 00924-0000, with coordinates 18.412383181812295, -66.02536577183776.
- 29.102. Banco Popular – Ave. de 65 Infanteria Shopping Center (hereinafter Branch Ave. de 65 Infanteria Shopping Center) located at Centro Comercial, Av. 65 de Infantería, San Juan, PR 00923-0000, with coordinates 18.39549714478916, -66.04115990074042.
- 29.103. Banco Popular – Barbosa (hereinafter Branch Barbosa) located at 618 Ave. Barbosa, San Juan, PR 00917-0000, with coordinates 18.4117105689682, -66.04361285018109.
- 29.104. Banco Popular – Plaza Del Mercado Río Piedras (hereinafter Branch Plaza Del Mercado Río Piedras) located at 155 Av. José de Diego, San Juan, PR 00925-0000, with coordinates 18.398530199514518, -66.04712342788147.
- 29.105. Banco Popular – Cupey Center (Evertec) (hereinafter Branch Cupey Center (Evertec)) located at Street 176 Km. 1.2, San Juan, PR 00928-0000, with coordinates 18.38033191066022, -66.05493709815894.
- 29.106. Banco Popular – Barrio Obrero (hereinafter Branch Barrio Obrero) located at Ave. Borinquen 2250, Bo. Obrero, Santurce, San Juan, PR 00915-0000, with coordinates 18.435042119601004, -66.04813062104343.
- 29.107. Banco Popular – Muñoz Rivera (hereinafter Branch Muñoz Rivera) located at 1125 Ave. Muñoz Rivera, San Juan, PR 00925-0000, with coordinates 18.3991577512753, -66.05577598635423.

- 29.108. Banco Popular – Galería Los paseos (hereinafter Branch Galería Los paseos) located at Boulevard, Galería Paseos Mall, 100 Grand Paseo Boulevard, San Juan, Puerto Rico 00926-0000, with coordinates 18.35706602545878, -66.06412137176322.
- 29.109. Banco Popular – Parada 34 - Hato Rey (hereinafter Branch Parada 34 - Hato Rey), located at 209 Av. Luis Muñoz Rivera, Hato Rey Central, San Juan, PR 00918-0000, with coordinates 18.427281893900656, -66.05823545513542.
- 29.110. Banco Popular – Montehiedra (hereinafter Branch Montehiedra), located at Street Los Romeros Km. 1.9, Bo, San Juan, PR 00926-0000, with coordinates 18.34054534964851, -66.07007703177709.
- 29.111. Banco Popular – Popular Center (hereinafter Branch Popular Center), located at 209 Av. Juan Ponce de León, San Juan, PR 00917-0000, with coordinates 18.427128636168405, -66.05853298834465.
- 29.112. Banco Popular – El Señorial Shopping Center (hereinafter Branch El Señorial Shopping Center), located at Ave. Winston Churchill 22, Esq. Parana, San Juan, PR 00926-0000, with coordinates 18.369968783841546, -66.06780595084984.
- 29.113. Banco Popular – San Jose (hereinafter Branch San Jose), located at Street Alda 1565, Urb. El Caribe, San Juan, PR 00926-0000, with coordinates 18.38416730976337, -66.06625162753198.
- 29.114. Banco Popular – Parada 26 (hereinafter Branch Parada 26), located at Ave. Ponce de Leon 1900, Pda. 26, San Juan, PR 00915-0000, with coordinates 18.438355682014922, -66.05951091958771.

- 29.115. Banco Popular – Street Loiza (hereinafter Branch Street Loiza), located at Street Loiza 1812, San Juan, PR 00911-0000, with coordinates 18.451582134408007, -66.05882899445125.
- 29.116. Banco Popular – Señorial Center (hereinafter Branch Señorial Center), located at Ave. Lomas Verdes, Int. Carrs 177 y 52, San Juan, PR 00926-0000, with coordinates 18.368618599388515, -66.07297663123117.
- 29.117. Banco Popular – Centro Médico (hereinafter Branch Centro Médico) located at 344 Ave. Americo Miranda, San Juan, PR 00926-0000, with coordinates 18.38706711265851, -66.0823379.
- 29.118. Banco Popular – Parada 22 (hereinafter Branch Parada 22) located at 1500 Ave. Ponce de León, San Juan, PR 00909-1727, with coordinates 18.44621235138626, -66.06836254232886.
- 29.119. Banco Popular – Reparto Metropolitano (hereinafter “Branch Reparto Metropolitano”) located at 1008 Ave. Americo Miranda, San Juan, PR 00921-2842, with coordinates 18.400882515629174, -66.075377.
- 29.120. Banco Popular – Condado Centro (hereinafter Branch Condado Centro) located at 1358 Ave Ashford, San Juan, PR 00907-0000, with coordinates 18.455241891547537, -66.06863980264725.
- 29.121. Banco Popular – Plaza Las Américas (hereinafter Branch Plaza Las Américas) located at 525.Ave Roosevelt, San Juan, PR 00918-0000, with coordinates 18.423358299740734, -66.07506268382946.

- 29.122. Banco Popular – San Francisco (hereinafter Branch San Francisco Shopping) located at 201 Ave De Diego, San Juan, PR 00927-0000, with coordinates 18.38708951407854, -66.08233606934607.
- 29.123. Banco Popular – Condado Gallery (hereinafter Branch Condado Gallery) located at 100 Ave Roberto H Todd, San Juan, PR 00907-0000, with coordinates 18.4528714923305, -66.07367194602683.
- 29.124. Banco Popular –Walmart Pda 18 (hereinafter “Branch Walmart Pda 18”) located at 18 Ave. Parada, San Juan, PR 00907-0000, with coordinates 18.448206461014802, -66.07600472883557.
- 29.125. Banco Popular - Puerto Nuevo (hereinafter “Branch Puerto Nuevo”) located at 301 Ave. De Diego, Esq. Ave. Roosevelt, San Juan, PR 00920-0000, with coordinates 18.413464821571466, -66.08911502883564.
- 29.126. Banco Popular - Miramar (hereinafter “Branch Miramar”) located at Edif. Centro de Seguros, Ave. Ponce de Leon 701, San Juan, PR 00907-0000, with coordinates 18.45623332875634, -66.08320952883562.
- 29.127. Banco Popular - Altamira Center (hereinafter “Branch Altamira Center”) located at Edif. Altamira, Ave. Martinez Nadal, Esq. Jesus T. Piñero, San Juan, PR 00927-0000, with coordinates 18.39441175836231, -66.10368188650689.
- 29.128. Banco Popular - San Juan Los Puertos (hereinafter “Branch San Juan Los Puertos”) located at 454 Comercio St., San Juan, PR 00901-0000, with coordinates 18.465206276780147, -66.11156595767127.

29.129. Banco Popular - Buchanan (hereinafter “Branch Buchanan”) located at Edif. 501 South Health Clinic, Fort Buchanan, San Juan, PR 00931-0000, with coordinates 18.41576836022448, -66.12198293068512.

29.130. Banco Popular - San Juan (hereinafter “Branch San Juan”) located at Street Tetuan 206, San Juan, PR 00901-0000, with coordinates 18.464395618835, -66.11519985767127.

SAN LORENZO

29.131. Banco Popular-San Lorenzo (hereinafter “Branch San Lorenzo”), located at Street.183 KM 10.3 Bo. Hato, San Lorenzo, PR 00754-0000, with coordinates 18.185891940060696, -65.96732008303253.

SAN SEBASTIAN

29.132. Banco Popular-San Sebastian Pueblo (hereinafter “Branch San Sebastián Pueblo”), located at Street. 111, Int. 446 , Km. 18 Bo. Guatemala, San Sebastián, PR 00685-0000, with coordinates 18.18588111008391, -65.96731941248031.

SANTA ISABEL

29.133. Banco Popular-Santa Isabel (hereinafter “Branch Santa Isabel”), located at Street 153 Int. Street 542, Km. 57.7 Bo. Felicia Dos, Santa Isabel, PR 00757-0000, with coordinates 18.01013280515795, -66.38323303789612.

TOA ALTA

29.134. Banco Popular - Toa Alta (hereinafter “Branch Toa Alta”), located at street 165 Km. 11.5, Toa Alta, PR 00953-0000, with coordinates 18.391289707544995, -66.253186.

TOA BAJA

- 29.135. Banco Popular - Levittown (hereinafter "Branch Levittown"), located at Ave. Los Dominicos, Esq. Rosa de Tejas, Toa Baja, PR 00949-0000, whose coordinates are 18.444191399503982, -66.17506548519255.
- 29.136. Banco Popular - Toa Baja (hereinafter "Branch Toa Baja"), located at Street #2, Km 18.6, Barrio Candelaria, Toa Baja, PR 00953-0000, whose coordinates are 18.40435470123099, -66.22373656137357.

TRUJILLO ALTO

- 29.137. Banco Popular - Trujillo Alto Pueblo (hereinafter "Branch Trujillo Alto Pueblo"), located at 3 Street Muñoz Rivera, Trujillo Alto, PR 00976-0000, whose coordinates are 18.356388392472734, -66.00590431534339.
- 29.138. Banco Popular - Trujillo Alto Shopping Center (hereinafter "Branch Trujillo Alto Shopping Center"), located at Street 181 Km. 3.5, Trujillo Alto, PR 00976-0000, whose coordinates are 18.371092187132128, -66.01690216931321.

UTUADO

- 29.139. Banco Popular - Utuado (hereinafter "Branch Utuado"), located at 93 Street Dr. Cueto, Utuado, PR 00641-0000, whose coordinates are 18.266246976152726, -66.70375722883584.

VEGA ALTA

- 29.140. Banco Popular - Vega Alta (hereinafter "Branch Vega Alta"), located at Centro Gran Caribe Mall, Street 2 Km. 29.7, Vega Alta, PR 00692-0000, whose coordinates are 18.413017150582583, -66.32129658650754.

VEGA BAJA

- 29.141. Banco Popular - Vega Baja (hereinafter "Branch Vega Baja"), located at Street 2, Marginal, Km. 38.2, Vega Baja, PR 00693-0000, whose coordinates are 18.44618372977311, -66.38607591534338.

VILLALBA

- 29.142. Banco Popular - Villalba (hereinafter "Branch Villalba"), located at Street Muñoz Rivera 69, Villalba, PR 00766-0000, whose coordinates are 18.13019661968308, -66.49264312698492.

YABUCOA

- 29.143. Banco Popular - Yabucoa Panoramica (hereinafter "Yabucoa Panoramica"), located at Street Ernesto Carrasquillo 561, Yabucoa, PR 00767-0000, whose coordinates are 18.04394692378393, -65.86576364417922.

YAUCO

- 29.144. Banco Popular - Yauco Pueblo (hereinafter "Yauco Pueblo"), located at Street Betances, Esq. Mattei Lluberas, Yauco, PR 00698-0000, whose coordinates are 18.035703638366197, -66.8492438.
- 29.145. Banco Popular - Yauco Plaza (hereinafter "Yauco Plaza"), located at Yauco Plaza Shopping Center II, Street 128 Int. #2 Street 663, Yauco, PR 00698-0000, whose coordinates are 18.02685785234653, -66.85436308465661.
30. This Court has federal question jurisdiction pursuant to 28 U.S.C. §1331 and 42 U.S.C. § 12188.
31. Plaintiff's claims asserted herein arose in this judicial district and Defendant does substantial business in this judicial district.

32. Venue in this judicial district is proper under 28 U.S.C. §1391(b)(2) in that this is the judicial district in which a substantial part of the events and/or omissions at issue occurred.
33. Defendant owns, operates, controls and/or leases the properties where each of Banco Popular's branches, as identified in Section B of this Complaint, are located.

C. Discrimination in the Properties Where Each of Banco Popular de Puerto Rico's Branches Are Located

Banco Popular's Adjuntas Branch

34. Mr. Sepúlveda enjoys trips to various places in Puerto Rico, including the municipality of Adjuntas, where he discovers new locations with charming and welcoming atmospheres. He especially enjoys visiting Plaza Poeta Arístides Moll Boscana because of its fresh ambiance, surrounded by palm trees and beautiful architecture. He enjoys spending time in this plaza, which is located directly in front of Banco Popular's Adjuntas branch. Its convenient location makes it a logical place for him to conduct his banking transactions. However, since November 2024, he is aware of several architectural barriers at the location and feels dissuaded from going. Mr. Uriel Sepúlveda is aware of the following architectural barriers at Branch Adjuntas

- 34.1. Tall Transaction and Customer Service Counters: Mr. Uriel is aware that the transaction and customer service counters at Branch Adjuntas are too tall, preventing him from using them effectively. Due to his bilateral cervical and lumbar radiculopathy, raising his arms above a certain height causes significant pain and makes it difficult for him to maintain balance while relying on his walker. The excessive height of the counters forces him into an uncomfortable posture, creating strain on his spine and sacroiliac joints, making it difficult for

him to complete transactions or receive customer service safely and without discomfort. Mr. Sepúlveda has a strong interest in becoming a Banco Popular client due to its excellent service and reputation. However, he has felt dissuaded from doing so because he knows that accessing and utilizing the bank's services is not feasible for him in a safe and accessible manner. The presence of these architectural barriers has prevented him from engaging with the bank, as attempting to use its facilities subjects him to unnecessary strain, discomfort, and unequal access compared to individuals without mobility disabilities.

- 34.2. Shallow Transaction and Customer Service Counters: Mr. Uriel is aware that the transaction and customer service counters at Branch Adjuntas lack adequate depth, preventing him from getting close enough to comfortably conduct his business. Due to his chronic osteoarthritis in the spine and sacroiliac joints, he needs to maintain a stable posture while relying on his walker. The lack of space at the counters forces him to stretch into an awkward position, causing pain and making it difficult to properly use the service area. This barrier compromises his ability to complete transactions or receive assistance without experiencing discomfort or the risk of losing balance. Because of these accessibility barriers, Mr. Sepúlveda has felt discouraged from becoming a Banco Popular client, despite his strong interest in the institution. He recognizes that the layout of the counters does not accommodate his physical limitations, making it impractical for him to use the bank's services in a safe and accessible manner. Given these barriers, he has been unable to access the bank's services on equal terms

34.3. The barriers at Branch Adjuntas could be eliminated by lowering the height of the transaction and customer service counters to ensure they are within an accessible range for individuals who use mobility aids, such as walkers. Additionally, increasing the depth of the counters allows Mr. Uriel to get close enough to conduct his transactions comfortably without having to stretch into an awkward position. These modifications enable him to complete transactions and receive customer service without experiencing pain, discomfort, or balance issues. If these barriers are addressed, Mr. Sepúlveda no longer feels dissuaded from visiting the branch, knowing he can access banking services comfortably and without obstacles.

Banco Popular's Aguada Branch

35. Mr. Uriel frequently visits the municipality of Aguada, a place that captivates him with its beaches, churches, ruins, water parks, and even a pyramid, all of which make the area particularly appealing to him. In this municipality, there is also a Banco Popular branch, Aguada, which is located near several businesses he likes to visit, such as Piragüas El Correcamino and other stores of interest like Mueblería La 15 and One to Seven Plus. However, since January 2025, he has been aware of several architectural barriers at the location, which make him feel dissuaded from visiting. Due to his health conditions and his use of a walker for mobility, he worries about encountering obstacles that could prevent him from accessing the services comfortably and without restrictions. Mr. Uriel Sepúlveda is aware of the following architectural barriers at Branch Aguada:

35.1. Extremely Tall Transaction And Customer Service Counters: Mr. Uriel is aware that the transaction and customer service counters at Branch Aguada are

extremely tall, preventing him from using them effectively. These counters consist of a smooth, dark gray panel, and along the front, there is a cylindrical wood-colored bar or tube that extends horizontally and is fixed to the counters. Due to his bilateral cervical and lumbar radiculopathy, raising his arms above a certain height causes intense pain and makes it difficult for him to maintain balance while relying on his walker. The excessive height of the counters forces him into an uncomfortable posture, creating strain on his spine and sacroiliac joints, making it difficult for him to complete transactions or receive customer service safely and without discomfort. Because of these barriers, Mr. Sepúlveda has felt discouraged from using Banco Popular's services at this location, despite his strong interest in becoming a client. He recognizes that the physical design of the counters does not accommodate his mobility limitations, making it impractical for him to access banking services independently. Rather than subjecting himself to unnecessary physical discomfort, instability, and an unequal service experience, he avoids visiting the branch, as he is aware that it does not provide the accessibility he needs to bank with dignity and ease.

- 35.2. Transaction And Customer Service Counters Without Depth: Mr. Uriel is aware that the transaction and customer service counters at Branch Aguada lack adequate depth, preventing him from getting close enough to conduct his business comfortably. These counters consist of a smooth, dark gray panel, and along the front, there is a cylindrical wood-colored bar or tube that extends horizontally and is fixed to the counters. Due to his chronic osteoarthritis in the spine and sacroiliac joints, he needs to maintain a stable posture while relying on his walker.

The lack of space at the counters forces him to stretch into an awkward position, causing pain and making it difficult to properly use the service area. This barrier affects his ability to complete transactions or receive assistance without experiencing discomfort or the risk of losing balance. As a result of these architectural barriers, Mr. Sepúlveda has felt deterred from using Banco Popular's services at this location, despite his strong interest in becoming a client. Rather than endure an inadequate and inaccessible experience, he avoids visiting the branch, recognizing that the design of its facilities does not accommodate his mobility limitations or allow him to conduct his transactions with the independence and ease he requires.

- 35.3. The barriers at Branch Aguada could be eliminated by lowering the height of the transaction and customer service counters to ensure they are at a level that allows Mr. Sepúlveda to access them comfortably and conduct his transactions with ease. Additionally, increasing the depth of the counters allow him to get close enough to complete his banking activities without having to stretch into an awkward position. Removing or repositioning the cylindrical wood-colored bar or tube fixed to the counters also improves accessibility by eliminating an obstruction that further limits his ability to use the service area properly. These modifications enable him to complete transactions and receive customer service without experiencing pain, discomfort, or balance issues. If these barriers were removed, Mr. Sepúlveda would be able to access banking services in a safe and equal manner.

Banco Popular's Aguadilla Branches

36. Aguadilla is a place Mr. Uriel Sepulveda enjoys, as it offers a mix of attractions and establishments that make his time there pleasant. Among the places he frequents is Denny's, a restaurant he finds appealing due to its comfortable environment and diverse menu. Given that this restaurant is situated near Banco Popular's Branch Ramey, the branch naturally becomes a location of interest for him when considering where to handle his banking transactions while in the area. However, since December 2024, he has become aware of several architectural barriers at this branch, which make him feel dissuaded from visiting. Given his health conditions and reliance on a walker for mobility, he is concerned about encountering obstacles that may limit his ability to access the services comfortably and without restrictions. Mr. Uriel Sepúlveda is aware of the following architectural barriers at Branch Ramey:

36.1. Extremely Tall Transaction And Customer Service Counters: Mr. Uriel is aware that the transaction and customer service counters at Branch Ramey are extremely tall, preventing him from using them effectively. These counters are white and have a height that makes it difficult for him to reach the surface without raising his arms above a comfortable level. Due to his bilateral cervical and lumbar radiculopathy, this movement causes intense pain and makes it difficult for him to maintain balance while relying on his walker. The excessive height of the counters forces him into an uncomfortable posture, creating strain on his spine and sacroiliac joints, making it impossible for him to complete transactions or receive customer service safely and without discomfort. The architectural barriers at Banco Popular's Branch Ramey have discouraged Mr. Uriel Sepúlveda from

engaging with the bank, despite his strong desire to become a client. Aware that the facilities do not accommodate his mobility limitations or allow him to conduct his banking transactions independently and with dignity, he avoids visiting the branch.

36.2. Transaction And Customer Service Counters Without Depth: Mr. Uriel is aware that the transaction and customer service counters at Branch Ramey lack adequate depth, preventing him from getting close enough to conduct his business comfortably. These counters are white and do not provide enough space for him to position himself stably with his walker. Due to his chronic osteoarthritis in the spine and sacroiliac joints, he needs to maintain a balanced posture while relying on his walker. The lack of depth in the counters forces him to lean and stretch into an awkward position, causing pain and making it difficult for him to properly use the service area. This barrier affects his ability to complete transactions or receive assistance without experiencing discomfort or the risk of losing balance. As a result, Mr. Sepúlveda feels discouraged from engaging with Banco Popular at this location. Despite his strong interest in becoming a client, he avoids visiting Branch Ramey because he knows that its design does not accommodate his mobility limitations, making access to its services impractical and physically burdensome

36.3. The barriers at Branch Ramey can be addressed by adjusting the height of the transaction and customer service counters to ensure they are at a level that allows Mr. Sepúlveda to access them comfortably. Additionally, increasing the depth of the counters enable him to get close enough to conduct his transactions without

having to lean or stretch into an awkward position. These modifications provide a more accessible and accommodating environment, allowing him to complete his banking transactions and receive customer service without experiencing pain, discomfort, or balance issues. If these barriers are removed, he no longer feels dissuaded from visiting the branch and is able to access the services with confidence and ease.

37. As previously mentioned, Mr. Sepúlveda enjoys visiting the municipality of Aguadilla, where he frequently finds locations of interest. In particular, he is especially interested in visiting Nissan de Aguadilla – Aguadilla Motors and the Subway restaurant in the area, two businesses that are extremely close to Banco Popular’s Aguadilla Sur branch. This proximity makes it convenient for him to handle his banking transactions while visiting the businesses he enjoys. However, since December 2024, he has been aware of several architectural barriers at the location, which make access difficult and make him feel dissuaded from visiting. Due to his health conditions and his use of a walker for mobility, he worries about encountering obstacles that could prevent him from accessing the services comfortably and without restrictions. Mr. Uriel Sepúlveda is aware of the following architectural barriers at Branch Aguadilla Sur:

- 37.1. Extremely Tall Transaction And Customer Service Counters: Mr. Uriel is aware that the transaction and customer service counters at Branch Aguadilla Sur are extremely tall, preventing him from using them effectively. Due to his bilateral cervical and lumbar radiculopathy, raising his arms above a certain height causes intense pain and makes it difficult for him to maintain balance while relying on his walker. The excessive height of the counters forces him into an uncomfortable

posture, creating strain on his spine and sacroiliac joints, making it impossible for him to complete transactions or receive customer service safely and without discomfort. These accessibility barriers have discouraged Mr. Sepúlveda from engaging with Banco Popular's Branch Aguadilla Sur, despite his strong interest in becoming a client. He recognizes that the design of the counters does not accommodate his mobility limitations, making access to banking services impractical and physically burdensome. Rather than subjecting himself to an unequal and inaccessible experience, he avoids visiting the branch, knowing that he cannot conduct his transactions independently and with dignity.

- 37.2. Transaction And Customer Service Counters Without Depth: Mr. Uriel is aware that the transaction and customer service counters at Branch Aguadilla Sur lack adequate depth, preventing him from getting close enough to conduct his business comfortably. Due to his chronic osteoarthritis in the spine and sacroiliac joints, he needs to maintain a stable posture while relying on his walker. The lack of space at the counters forces him to lean and stretch into an awkward position, causing pain and making it difficult for him to properly use the service area. This barrier affects his ability to complete transactions or receive assistance without experiencing discomfort or the risk of losing balance. As a result of these accessibility barriers, Mr. Sepúlveda has felt discouraged from engaging with Banco Popular's Branch Aguadilla Sur, despite his strong desire to become a client. He recognizes that the counter design does not accommodate his mobility limitations, making it difficult and physically burdensome for him to access the bank's services. To avoid the discomfort and challenges posed by this inadequate

design, he refrains from visiting the branch, as he is aware that it does not provide the accessibility he needs to conduct his transactions independently and safely.

- 37.3. The barriers at Branch Aguadilla Sur can be addressed by adjusting the height of the transaction and customer service counters to ensure they are at a level that allows Mr. Uriel to access them comfortably. Additionally, increasing the depth of the counters enable him to position himself properly and complete his transactions without having to lean or stretch into an awkward posture. These modifications allow him to conduct his banking activities and receive customer service without experiencing pain, discomfort, or balance issues, ensuring a more inclusive and accessible environment. If these barriers are removed, he no longer feels dissuaded from visiting the branch and is able to access its services with ease and confidence.

Banco Popular's Aguas Buenas Branch

38. Mr. Molina enjoys taking short trips to explore different municipalities in Puerto Rico, and Aguas Buenas is one of the places that capture his interest. The area appeals to him with its scenic viewpoints, such as Cerro La Tiza and Cerro Marquessa, making his visits both enjoyable and refreshing. Having access to a reliable bank while in the municipality is important to him, as it allows him to manage his financial transactions with ease. Banco Popular's Aguas Buenas branch stands out as a convenient option due to the institution's solid reputation and its presence across multiple regions. He recognizes the bank's commitment to innovation and its highly skilled team of professionals who continuously adapt to market demands. Given these factors, the branch naturally becomes a point of interest for him when considering where to handle his banking needs.

However, since November 2024, he has been aware of several architectural barriers at this branch, which make him feel dissuaded from visiting. Due to his health conditions and reliance on a wheelchair for mobility, he worries about encountering obstacles that could prevent him from accessing the services comfortably and without restrictions. Mr. Molina is aware of the following architectural barriers at the Branch Aguas Buenas:

- 38.1. Extremely Tall Transaction And Customer Service Counters: Mr. Carlos Molina is aware that the transaction and customer service counters at Branch Aguas Buenas are extremely tall, preventing him from using them effectively from his wheelchair. The counter is a very dark gray color with a coffee or wood-colored surface, and its height does not allow him to reach the surface comfortably. Due to his muscular dystrophy, he does not have the strength to raise his arms to that height and handle objects easily. This barrier forces him to rely on others to complete transactions or receive assistance, limiting his independence and making it difficult for him to access the establishment's services. As a Banco Popular client, Mr. Molina depends on the bank's services to manage his financial affairs. However, the excessive height of the counters at Branch Aguas Buenas has discouraged him from visiting this location, as he knows that he cannot access its services independently. Instead of being able to conduct his banking transactions with ease, he is forced to depend on third parties, which deprives him of an equal customer experience. The presence of these barriers has made him feel unwelcome and excluded, as the bank's facilities do not accommodate his mobility limitations.

- 38.2. Transaction And Customer Service Counters Without Depth: Mr. Carlos Molina is aware that the transaction and customer service counters at Branch Aguas Buenas lack adequate depth, preventing him from getting close enough to conduct his business comfortably from his wheelchair. The counter is a very dark gray color with a coffee or wood-colored surface, and its lack of space prevents him from positioning his wheelchair stably in front of it. Due to his muscular dystrophy, he needs a nearby support point to interact with the service area without difficulty. The lack of depth forces him to stretch uncomfortably, causing fatigue and making it difficult for him to complete transactions or receive assistance independently. As a Banco Popular client, Mr. Molina depends on the bank's services to manage his financial affairs. However, the inadequate design of the counters at Branch Aguas Buenas has discouraged him from visiting this location, as he knows that he cannot conduct his banking transactions comfortably and independently. The inability to position himself properly at the counter forces him to exert unnecessary effort and rely on others for assistance, reducing his autonomy. This situation has made him feel excluded, as the bank's facilities do not accommodate his mobility limitations, preventing him from accessing services in the same manner as other clients.
- 38.3. The barriers at Branch Aguas Buenas can be addressed by adjusting the height of the transaction and customer service counters to ensure they are at a level that allows Mr. Carlos Molina to access them comfortably. Additionally, increasing the depth of the counters enable him to position himself properly in front of them without struggling to reach the surface. These modifications allow him to

complete his transactions and receive customer service independently, without discomfort or the need for assistance. Removing these barriers, create a more accessible and inclusive environment, ensuring that he no longer feels dissuaded from visiting the branch and can access its services with confidence and ease.

Banco Popular's Aibonito Branch

39. Mr. Carlos Molina greatly enjoys spaces surrounded by nature and has a deep appreciation for Aibonito, a place that captivates him with its beautiful gardens and nurseries, colorful flowers, and peaceful atmosphere in the Central Mountain Range of Puerto Rico. Aibonito is an ideal destination for those looking to connect with nature, and Mr. Molina especially values the tranquility and beauty it offers. During his trips to the town, he finds it convenient to visit the Banco Popular branch in Puerto Rico, as a client, to handle his transactions and banking needs. However, he is aware of the architectural barriers to access, which concern him as they result in unequal treatment and make it difficult to complete his tasks at the branch. The barriers are:

- 39.1. Overly High Counters: Mr. Molina is aware that the counters at the bank branch are too high for him, as he relies on a wheelchair. Due to their height, he has to stretch excessively, which is uncomfortable and difficult for him to manage. This also complicates his communication with the staff, as the height mismatch creates barriers in their interaction. These challenges directly affect him, discouraging him from going to the branch, as they prevent him from handling his transactions in a comfortable and efficient manner.
- 39.2. Lack of Depth in Counters Hindering Accessible Front-Entry: Mr. Molina is also aware of the lack of depth in the counters, which prevents comfortable frontal

access for him as a wheelchair user. This lack of space makes it difficult for him to approach the counter properly, affecting his ability to carry out his transactions independently. The depth mismatch not only causes discomfort but also complicates his interaction with the staff, as he cannot position himself appropriately for effective communication, which directly impacts his experience at the branch. All of this discourages him from going, as the physical barriers limit his ability to complete his tasks efficiently.

- 39.3. To address these accessibility barriers, Banco Popular should consider lowering the height of the counters to accommodate wheelchair users, ensuring they are at a comfortable level for individuals like Mr. Molina. Additionally, increasing the depth of the counters allow for better frontal access, providing sufficient space for wheelchair users to approach and interact with the staff without discomfort. By making these adjustments, the bank can ensure a more inclusive environment for all customers. If these modifications are made, Mr. Carlos Molina is able to visit the branch he so desires during his trips to Aibonito, allowing him to carry out his transactions comfortably and independently.

Banco Popular's Añasco Branch

40. Mr. Sepúlveda is a traveler who enjoys discovering new places and having new gastronomic experiences. The municipality of Añasco has particularly caught his attention because of its beaches, parks, monuments, and historical sites, such as Parroquia San Antonio Abad Añasco. Additionally, he is interested in visiting shopping centers like Añasco Plaza, which he enjoys for its variety of restaurants and clothing stores. When visiting Añasco Plaza, he likes to be able to access Banco Popular's Branch Añasco

conveniently and handle his transactions independently. However, despite his interest in visiting the branch and becoming a client of the bank, since October 2024, he has been aware of several architectural barriers at the location that could make access difficult. Due to his health conditions and his use of a walker for mobility, he fears going and experiencing discrimination and unequal treatment compared to individuals without disabilities. Mr. Uriel Sepúlveda is aware of the following architectural barriers at Branch Añasco:

- 40.1. Extremely Tall Transaction And Customer Service Counters: Mr. Uriel is aware that the transaction and customer service counters at Branch Añasco are extremely tall, preventing him from using them effectively. Due to his bilateral cervical and lumbar radiculopathy, raising his arms above a certain height causes intense pain and makes it difficult for him to maintain balance while relying on his walker. The excessive height of the counters forces him into an uncomfortable posture, creating strain on his spine and sacroiliac joints, making it impossible for him to complete transactions or receive customer service safely and without discomfort. As a result, Mr. Sepúlveda has felt discouraged from engaging with Banco Popular's Branch Añasco, despite his strong interest in using its services. The presence of these architectural barriers has led him to avoid visiting the branch, as he is aware that it does not accommodate his mobility limitations or provide him with an equal and accessible banking experience.
- 40.2. Transaction And Customer Service Counters Without Depth: Mr. Uriel is aware that the transaction and customer service counters at Branch Añasco lack adequate depth, preventing him from getting close enough to conduct his business

comfortably. Due to his chronic osteoarthritis in the spine and sacroiliac joints, he needs to maintain a stable posture while relying on his walker. The lack of space at the counters forces him to lean and stretch into an awkward position, causing pain and making it difficult for him to properly use the service area. This barrier affects his ability to complete transactions or receive assistance without experiencing discomfort or the risk of losing balance. As a result of these accessibility barriers, Mr. Sepúlveda has felt discouraged from engaging with Banco Popular's Branch Añasco, despite his strong desire to use its services. He knows that the layout of the counters does not accommodate his mobility limitations, making access to banking services physically burdensome and impractical. To avoid unnecessary discomfort and the challenges posed by this inadequate design, he refrains from visiting the branch, recognizing that it does not provide the accessibility he needs to bank independently and with dignity.

- 40.3. The barriers at Branch Añasco could be eliminated by lowering the height of the transaction and customer service counters to ensure they are within an accessible range for individuals who use mobility aids, such as walkers. Additionally, increasing the depth of the counters allows Mr. Uriel to get close enough to conduct his transactions comfortably without having to lean or stretch into an awkward position. These modifications enable him to complete transactions and receive customer service without experiencing pain, discomfort, or balance issues, ensuring a more accessible and accommodating environment.

Banco Popular's Arecibo Branches

41. Mr. Sepúlveda loves traveling, discovering new places, and exploring new gastronomic experiences, the municipality of Arecibo has particularly caught his attention. Arecibo is home to beaches, caves, parks, and historical sites, such as the Catedral San Felipe Apóstol and Faro Punta Los Morrillos, making it even more appealing to him.
42. Additionally, when traveling by plane, he likes to have easy access to Banco Popular's Branch Arecibo Aeropuerto to conveniently conduct his transactions and fully enjoy his trip to Arecibo. However, despite his interest in visiting the branch and becoming a client of the bank, since November 2024, he has been aware of several architectural barriers at the location that could make access difficult. Due to his health conditions and his use of a walker for mobility, he fears going and experiencing discrimination and unequal treatment compared to individuals without disabilities. Mr. Uriel Sepúlveda is aware of the following architectural barriers at Branch Arecibo Aeropuerto:
 - 42.1. Transaction And Customer Service Counters That Are Too High: Mr. Uriel is aware that the transaction and customer service counters at Branch Arecibo Aeropuerto are too high, preventing him from using them comfortably. Because of his bilateral cervical and lumbar radiculopathy, lifting his arms beyond a certain level causes significant pain and makes it difficult for him to maintain balance while relying on his walker. The excessive height of the counters forces him into an awkward posture, placing strain on his spine and sacroiliac joints. As a result, he struggles to complete transactions or receive customer service without experiencing discomfort and difficulty. As a result, Mr. Sepúlveda has felt discouraged from using Banco Popular's Branch Arecibo Aeropuerto, despite his

strong interest in accessing its services. Rather than enduring an inaccessible and uncomfortable banking experience, he avoids visiting the branch, as he recognizes that its design does not accommodate his mobility limitations or allow him to bank independently and with dignity.

42.2. Transaction And Customer Service Counters Without Sufficient Depth: Mr. Uriel is aware that the transaction and customer service counters at Branch Arecibo Aeropuerto do not have enough depth, making it difficult for him to approach them properly. Since he depends on his walker for stability, he needs enough space to position himself comfortably while conducting transactions. Due to his chronic osteoarthritis in the spine and sacroiliac joints, he is unable to lean forward excessively without experiencing pain. The lack of depth at the counters forces him to stretch into an unnatural position, making it difficult for him to interact with staff and complete transactions without discomfort or the risk of losing balance. As a result, Mr. Sepúlveda has felt discouraged from using Banco Popular's Branch Arecibo Aeropuerto, despite his strong interest in accessing its services. He recognizes that the counter design does not accommodate his mobility limitations, making the banking experience physically demanding and impractical for him. To avoid unnecessary discomfort and instability, he refrains from visiting the branch, as he knows it does not provide the accessibility he needs to conduct his banking transactions safely and independently.

42.3. The barriers at Branch Arecibo Aeropuerto could be eliminated by lowering the transaction and customer service counters to a height that allows Mr. Uriel to use them comfortably without needing to lift his arms beyond a manageable level.

Additionally, increasing the depth of the counters provide enough space for him to position himself properly with his walker, allowing him to conduct transactions without having to lean forward into an awkward and painful position. These modifications enable him to interact with staff, complete transactions, and receive customer service without experiencing discomfort, pain, or balance difficulties.

43. As he has already mentioned before, there are many things that interest him about Arecibo. He is particularly drawn to its beaches, caves, parks, and historical sites. Mr. Sepúlveda wants to visit the Pizza Hut restaurant and Walgreens, located at 580 Ave. San Luis, Arecibo, PR 00612. This Walgreens is well known for offering a wide variety of products, making it an ideal place for exploring different groceries and goods. Both locations are extremely close to Banco Popular's Branch Arecibo San Luis, making it convenient for him to access the bank while visiting these establishments. However, despite his interest in visiting the branch and becoming a client of the bank, since November 2024, he has been aware of several architectural barriers at the location that could make access difficult. Because of this, he feels dissuaded from going, as he fears experiencing discrimination and unequal treatment compared to individuals without disabilities. Mr. Uriel Sepúlveda is aware of the following architectural barriers at Branch Arecibo San Luis:

- 43.1. Excessively High Transaction And Customer Service Counters: Mr. Uriel is aware that the transaction and customer service counters at Branch Arecibo San Luis are excessively high, making it difficult for him to use them comfortably. Because of his bilateral cervical and lumbar radiculopathy, raising his arms too high causes considerable pain and makes it challenging for him to maintain balance while

relying on his walker. The elevated counters force him into an uncomfortable position, placing strain on his spine and sacroiliac joints. As a result, he struggles to complete transactions or receive customer service without experiencing significant discomfort and difficulty. As a result, Mr. Sepúlveda has felt discouraged from engaging with Banco Popular's Branch Arecibo San Luis, despite his strong interest in accessing its services. Rather than enduring an inaccessible and challenging experience, he avoids visiting the branch, as he recognizes that its design does not accommodate his mobility limitations or allow him to bank independently and with dignity.

- 43.2. Transaction And Customer Service Counters With Insufficient Depth: Mr. Uriel is aware that the transaction and customer service counters at Branch Arecibo San Luis lack the necessary depth, preventing him from getting close enough to use them properly. Since he relies on his walker for support, he requires adequate space to position himself comfortably while conducting transactions. Due to his chronic osteoarthritis in the spine and sacroiliac joints, he cannot lean forward excessively without experiencing pain. The inadequate depth of the counters forces him to stretch awkwardly, making it difficult for him to interact with staff and complete transactions without discomfort or the risk of losing balance. As a result, Mr. Sepúlveda has felt discouraged from using Banco Popular's Branch Arecibo San Luis, despite his strong interest in accessing its services. He recognizes that the design of the counters does not accommodate his mobility limitations, making it impractical and physically burdensome for him to conduct his banking transactions. To avoid the discomfort and challenges posed by these

barriers, he refrains from visiting the branch, as he knows it does not provide the accessibility he needs to bank independently and with dignity.

- 43.3. The barriers at Branch Arecibo San Luis could be eliminated by lowering the height of the transaction and customer service counters to a level that allows individuals who use mobility aids, such as walkers, to access them comfortably. Additionally, increasing the depth of the counters provide enough space for Mr. Uriel to position himself properly without having to lean forward or stretch into an uncomfortable posture. These modifications enable him to complete transactions and receive customer service without experiencing pain, discomfort, or balance issues, ensuring a more accessible and accommodating environment.

Banco Popular's Arroyo Branch

44. Mr. Molina, a Banco Popular customer, enjoys taking short trips to explore different municipalities in Puerto Rico, including Arroyo, where he is drawn to points of interest such as Cerro Boca del Infierno, the Municipal Cemetery, Estadio José "Cheo" Cruz, Punta Figuras, and the historic lighthouse. He likes the Banco Popular branch in Arroyo and wants to visit it to conduct his banking transactions and withdraw money when he is in the area, as he considers Banco Popular a reputable and well-established financial institution, appreciating its dedication to innovation and the expertise of its highly skilled professionals who respond to market demands. However, since November 2024, he has been aware of the architectural barriers at the Arroyo branch, which prevent him from visiting. Due to his health condition and reliance on a wheelchair, he feels dissuaded from going, as he faces an unequal experience compared to customers without disabilities. Mr. Molina is aware of the following architectural barriers at the Arroyo branch:

44.1. Extremely Tall Banking Host Counter: Mr. Molina is aware that the banking host counter at Branch Arroyo is extremely tall, preventing him from using it effectively due to his mobility device and health condition. The counter has an oval shape, is dark gray, and has a light brown coffee-colored surface. Its excessive height makes it inaccessible for him. Mr. Molina, who uses a wheelchair due to muscular dystrophy, is unable to reach the counter's surface. His limited arm strength prevents him from lifting objects to such a high level, making it difficult for him to complete transactions or receive information without relying on others. He faces significant challenges in accessing banking services on equal terms with people without disabilities, as the high counter prevents him from interacting with bank staff in an accessible and autonomous manner. As a result, Mr. Molina faces significant obstacles in accessing banking services on equal terms with individuals without disabilities. The counter's design creates a barrier that prevents him from conducting transactions independently, forcing him to rely on others for assistance. This lack of accessibility has made him feel discouraged from engaging with Banco Popular's Branch Arroyo, as he is aware that he cannot access its services in a fair and autonomous manner.

44.2. Banking Host Counter Without Frontal Approach: Mr. Molina is aware that the banking host counter at Branch Arroyo does not have an adequate frontal approach, preventing him from positioning himself properly to receive assistance. The counter has an oval shape, is dark gray, and has a light brown coffee-colored surface, but its design does not allow him to approach it directly. Mr. Molina cannot position his wheelchair directly in front of the counter, forcing him into an

awkward side position that makes interacting with bank staff difficult. Due to his muscular dystrophy, he needs to maintain a stable posture, but the lack of a frontal approach prevents him from maneuvering easily and limits his independence when seeking assistance. This barrier affects his ability to access banking services in an accessible, safe, and unrestricted manner, creating an unequal experience compared to people without disabilities. This lack of accessibility has made Mr. Molina feel dissuaded from engaging with Banco Popular's Branch Arroyo, as he knows that the counter's design does not accommodate his mobility needs. Instead of being able to access banking services safely and without restriction, he faces an unequal experience compared to individuals without disabilities, making his visits to the branch frustrating and discouraging.

- 44.3. The barriers at Branch Arroyo can be addressed by adjusting the height of the banking host counter to ensure it is at a level that allows Mr. Molina to access it comfortably. This modification enabled him to reach the surface with ease and interact with bank staff independently, without unnecessary physical strain. Additionally, modifying the counter to allow for a proper frontal approach ensures that he can position himself directly in front of it, eliminating the need for awkward side positioning or uncomfortable stretching. These adjustments provide him with safe, dignified, and equal access to banking services, ensuring that he no longer feels dissuaded from visiting the branch and can conduct his transactions with confidence and ease.

Banco Popular's Barceloneta Branches

45. Mr. David Figueroa enjoys visiting different municipalities in Puerto Rico, and Barceloneta is a destination of particular interest to him. He especially likes going to Barceloneta Prime Outlets, a shopping center with a variety of stores, dining options, and entertainment.
46. As a Banco Popular customer, he values the convenience of the Banco Popular branch at Barceloneta Prime Outlets and wants to visit it to conduct his banking transactions while spending time in Barceloneta. However, since December 2024, he has been aware of the architectural barriers at the Barceloneta Prime Outlets branch, which prevent him from accessing the services he needs equitably. These barriers create significant accessibility challenges for him as a wheelchair user, making the banking experience unequal compared to customers without disabilities. As a result, he feels discouraged from visiting this branch. Mr. David Figueroa is aware of the following architectural barriers at the Barceloneta Prime Outlets branch:
- 46.1. Customer Service And Transaction Counters That Are Too High: Mr. David Figueroa is aware that the customer service and transaction counters at the Barceloneta Prime Outlets branch are excessively high, preventing him from using them effectively. Due to his cerebral palsy and the use of a wheelchair, he cannot comfortably reach the counter surface without significant effort. This barrier makes it difficult for him to complete transactions independently, as he cannot hand over or receive documents or money without assistance. Additionally, the excessive height of the counter forces him to raise his arms beyond his comfort level, causing pain and fatigue due to his severe arthritis. The

lack of accessibility at the counter affects his ability to conduct banking transactions autonomously and on equal terms with other customers. As a result, Mr. Figueroa feels discouraged from engaging with Banco Popular's Barceloneta Prime Outlets branch, knowing that the counter design does not accommodate his mobility limitations. This inaccessibility prevents him from handling his banking needs independently and comfortably, making his experience at the branch unnecessarily difficult and frustrating.

- 46.2. Counters Without Depth For A Frontal Approach: Mr. David Figueroa is aware that the counters at the Barceloneta Prime Outlets branch do not have the necessary depth to allow him to approach them frontally with his wheelchair. Due to this design flaw, he is forced to position himself sideways or maintain an uncomfortable posture to interact with bank staff. This barrier not only makes it difficult for him to access banking services but also causes strain on his body, exacerbating the discomfort caused by his severe arthritis and blood clots in his legs. The lack of adequate space for a frontal approach limits his ability to conduct transactions safely and without obstacles, preventing him from receiving the same level of service as other customers in an equitable manner. As a result, Mr. Figueroa feels discouraged from engaging with Banco Popular's Barceloneta Prime Outlets branch, knowing that the counter's design does not accommodate his mobility needs. The lack of space for a frontal approach prevents him from conducting banking transactions easily and independently, making his experience unequal and unnecessarily challenging.

- 46.3. The barriers at the Barceloneta Prime Outlets branch could be eliminated by lowering the height of the customer service and transaction counters to ensure they are within an accessible range for individuals who use mobility devices, such as wheelchairs. This adjustment would allow Mr. David Figueroa to comfortably reach the surface without unnecessary strain, enabling him to complete transactions independently without requiring assistance. Additionally, modifying the counters to include adequate depth for a proper frontal approach would allow him to position himself directly in front of them with his wheelchair, eliminating the need for uncomfortable side positioning. These modifications would ensure that Mr. Figueroa can access banking services safely, comfortably, and on equal terms with other customers, allowing him to conduct his transactions independently and without physical discomfort.
47. As previously mentioned, Barceloneta is one of Mr. David Figueroa's favorite destinations, which is why he values the reliability and presence of Banco Popular. Given these factors, the Cruce Dávila branch is a location of interest to him, as it provides a convenient option for handling his banking transactions while he is in the area. However, since December 2024, he has been aware of the architectural barriers at this location, which prevent him from accessing the services he needs equitably. As a result, he feels dissuaded from visiting, as he faces accessibility challenges that create an unequal experience compared to customers without disabilities. Mr. David Figueroa is aware of the following architectural barriers at the Cruce Dávila branch:
- 47.1. Extremely Tall Transaction And Customer Service Counters: Mr. David Figueroa is aware that the transaction and customer service counters at the Cruce Dávila

branch are extremely tall, preventing him from using them effectively from his wheelchair. Due to his cerebral palsy, he does not have enough mobility to lift his arms to that height without difficulty, making it impossible for him to comfortably reach the counter surface. Additionally, the elevated position of the counter forces him to lean forward and adopt an uncomfortable posture, causing fatigue and discomfort while trying to complete his transactions or receive customer service. This barrier limits his independence and prevents him from accessing the bank's services on equal terms with other customers. As a result, Mr. Figueroa feels discouraged from engaging with Banco Popular's Cruce Dávila branch, knowing that the counter's design does not accommodate his mobility limitations. This lack of accessibility restricts his independence and creates an unnecessarily challenging and frustrating banking experience.

- 47.2. Transaction And Customer Service Counters Without Depth: Mr. David Figueroa is aware that the transaction and customer service counters at the Cruce Dávila branch lack adequate depth, preventing him from getting close enough to conduct his transactions comfortably from his wheelchair. Due to his severe arthritis, he needs to maintain a stable posture and have proper support while carrying out any transaction. However, the lack of space at the counters forces him to stretch uncomfortably, causing pain and making it difficult for him to interact with the service area without experiencing discomfort. This barrier affects his ability to complete transactions or receive assistance independently, creating unnecessary limitations and mobility challenges. As a result, Mr. Figueroa feels dissuaded from engaging with Banco Popular's Cruce Dávila branch, knowing that the

counter's design does not accommodate his mobility needs. The lack of accessibility prevents him from receiving the same level of service as other customers, making his banking experience frustrating and unequal.

- 47.3. The barriers at the Cruce Dávila branch can be eliminated by adjusting the height of the transaction and customer service counters to ensure they are at a level that allows Mr. Figueroa to access them comfortably. Additionally, increasing the depth of the counters would enable him to position himself properly and complete his transactions without having to stretch into an awkward posture. These modifications would allow him to conduct his banking activities and receive customer service without experiencing pain, discomfort, or mobility challenges, ensuring a more inclusive and accessible banking experience. If these barriers are removed, he would no longer feel discouraged from visiting the branch and would be able to access its services with ease and confidence.

Banco Popular's Barranquitas Branch

48. Mr. Walberto feels drawn to traveling to the municipality of Barranquitas, as he is interested in learning more about its history and cultural traditions, particularly its craftsmanship and the natural beauty of the area. Additionally, he wants to visit the Barranquitas Branch of Banco Popular, which is located nearby and where he wants to access financial services that he considers important for his well-being and personal management. However, he is aware that there are architectural barriers at the establishment, which raises concerns for him, as any physical obstacle poses a significant challenge due to his reduced mobility and reliance on a wheelchair. This makes him feel

dissuaded from visiting, as he fears that the lack of adequate accommodations may hinder his access and negatively impact his experience at the location. The barriers are:

- 48.1. Extremely Tall Transaction and Customer Service Counter: Mr. Walberto is aware that the counter at the Barranquitas branch is excessively high, making it difficult for him to use effectively. The height of the counter prevents him from positioning himself comfortably and reaching the service area without difficulty, creating a significant barrier to communication with the staff. This limitation not only restricts his ability to hand over complete transactions and bank services, but also forces him to rely on others for assistance. The lack of an accessible counter prevents him from operating independently within the branch, turning a simple task into an unnecessarily complicated process and limiting his ability to conduct banking transactions on his own. As a result, Mr. Hernández Reyes feels dissuaded from visiting Banco Popular's Barranquitas Branch, as he knows that the counter's design does not accommodate his mobility limitations. The lack of an accessible service area prevents him from conducting banking transactions autonomously, depriving him of the ability to manage his finances on equal terms with other customers.
- 48.2. Counter Without Clearance: Mr. Walberto is aware that the counter at the Barranquitas branch lacks open space beneath it, preventing him from properly approaching the service area. This lack of accessibility makes it difficult for him to position himself correctly and creates a barrier to effective communication with the staff and the completion of his transactions. The absence of sufficient space under the counter forces him to remain in an uncomfortable position, affecting his

comfort and safety while conducting banking operations. As a result, this obstacle turns a routine banking transaction into a frustrating and exhausting experience, further increasing the challenges he faces in accessing the financial services he needs. By this situation, Mr. Hernández Reyes feels dissuaded from engaging with Banco Popular's Barranquitas Branch, as he knows that the counter's design does not accommodate his mobility needs. This barrier significantly limits his ability to access the financial services he requires, preventing him from managing his banking transactions on equal terms with other customers.

- 48.3. The barriers on the property could be eliminated by lowering the height of the counter to an accessible level and ensuring that there is an open space underneath, allowing individuals who use mobility devices to properly approach the service area. Additionally, implementing an alternative service station at a compliant height provides an equitable solution, ensuring that all customers, regardless of their mobility needs, can conduct their transactions independently and comfortably.

Banco Popular's Bayamón Branches

49. Mr. Walberto Hernandez is interested in visiting Bayamón for its extensive green areas and recreational spaces. Known for its commitment to nature and outdoor activities, Bayamón offers attractions such as the Parque de las Ciencias and the Julio Enrique Monagas National Park, both ideal for relaxation, hiking, and family outings. Unlike other urban areas, Bayamón stands out for its balance between modern development and natural beauty, making it an appealing destination for nature lovers. As he has already

mentioned before, there are many things that interest him about Bayamón. He is particularly drawn to its parks, cultural sites, and recreational areas.

50. One of the places he wants to visit is very close to the Lomas Verdes branch of Banco Popular. Having a branch in this area is an advantage for those, like him, who wish to conduct their banking transactions quickly and securely while enjoying everything Bayamón has to offer. However, he is aware that there are architectural barriers in the Lomas Verdes branch of Banco Popular, which discourages him from going, as his mobility is limited, and any obstacle represents a significant challenge for his movement and comfort during the visit. The barriers he is aware of are:

- 50.1. Extremely Tall Transaction and Customer Service Counter: Mr. Walberto Hernandez is aware that the transaction and customer service counter at the Lomas Verdes branch is excessively tall, making it difficult for him to use effectively. Due to his mobility limitations, he cannot stretch far enough to reach the counter without experiencing discomfort and difficulty in his movements. This barrier makes it challenging for him to hand over documents, receive cash, or communicate comfortably with staff, preventing him from conducting transactions independently. As a result, he must rely on third-party assistance to complete his transactions, reducing his autonomy. Mr. Hernandez feels discouraged from engaging with Banco Popular's Lomas Verdes Branch, as he knows that the counter's design does not accommodate his mobility needs. The lack of accessibility prevents him from interacting with bank staff in a fair and independent manner, creating an unequal banking experience that makes it challenging for him to access the financial services he requires.

- 50.2. Counter Without Clearance: Mr. Walberto Hernandez notices that the transaction and customer service counter at the Lomas Verdes branch lacks open space underneath, preventing him from getting close enough to conduct his transactions comfortably and safely. Since he uses a mobility device, the absence of sufficient space under the counter prevents him from positioning himself properly, forcing him to stretch uncomfortably or remain in an awkward posture during his transactions. This barrier significantly impacts his access, as it compromises his comfort and limits his ability to operate independently at the branch. As a result, Mr. Hernandez feels discouraged from visiting Banco Popular's Lomas Verdes Branch, as he knows that the counter's design does not accommodate his mobility needs. The lack of accessibility prevents him from interacting with bank staff in a fair and autonomous manner, creating an unequal experience that makes it challenging for him to manage his finances independently.
- 50.3. The barriers at the Lomas Verdes branch could be eliminated by installing a transaction and customer service counter at an accessible height, allowing individuals who use mobility devices to reach the service area without difficulty. Additionally, it is essential to ensure that the counter has sufficient clearance underneath, so individuals using scooters or wheelchairs can position themselves comfortably without being forced to stretch or adopt awkward postures. Removing these barriers not only facilitates access to financial services but also allows Mr. Hernandez to complete his transactions independently, without relying on third-party assistance, promoting his autonomy and ensuring a dignified and safe experience at the branch.

51. Mr. Walberto Hernandez considers that Bayamón stands out for its vibrant atmosphere and the wide range of outdoor spaces it offers for recreation and relaxation. Its infrastructure provides both residents and visitors with easy access to numerous green areas, making it an ideal place for leisure and various activities. One of the places he is interested in visiting is located near the Santa Rosa branch, making it a convenient choice for him. Its proximity makes it a convenient option for him to access banking services without requiring significant detours, allowing for a practical and efficient experience as he navigates the area. The accessibility of this branch provides a practical solution for individuals like him who value efficiency when handling their banking transactions. However, he is aware that the establishment has architectural barriers, which make him feel dissuaded from visiting, as his mobility is limited, and any obstacle could hinder his access and impact his experience at the location. The barriers he has identified are:

51.1. Inappropriate Height of the Customer Service and Transaction Counter: Mr. Walberto Hernandez is aware that the transaction and customer service counter at the Santa Rosa branch is excessively high, making it difficult for him to use efficiently and without discomfort. Due to his mobility limitations, his ability to stretch and reach the counter is extremely restricted. This means that every attempt to hand over documents, receive cash, or interact with bank staff becomes a physical challenge. When trying to reach the counter, he experiences significant strain in his arms and back, causing discomfort and even pain. The need to excessively lean forward or keep his arms raised for an extended period in order to reach the counter further exacerbates the situation, leading to considerable discomfort and increasing the risk of losing his balance. Furthermore, the

difficulty in communicating smoothly with bank staff makes him feel uncomfortable and dependent on third-party assistance, which affects his autonomy and confidence in carrying out his banking transactions. As a result, Mr. Hernandez avoids visiting Banco Popular's Santa Rosa branch, knowing that the counter's design does not accommodate individuals with mobility impairments. The lack of accessibility prevents him from interacting independently with bank staff, depriving him of the right to receive financial services on equal terms. This exclusionary design turns access to essential banking services into a frustrating and, in many cases, unfeasible experience for him.

- 51.2. Lack of Space Under the Counter Preventing Proper Access: Mr. Walberto Hernandez has noticed that the transaction and customer service counter at the Santa Rosa branch lacks open space underneath, creating a significant barrier to his mobility and access to banking services. Since he uses a mobility device, the absence of a clear area beneath the counter prevents him from positioning himself in a proper and safe manner to conduct his transactions. Instead of being able to approach the counter as a person without mobility restrictions, he is forced to stop at a considerable distance and strain his posture to interact with bank staff. This situation requires him to extend his arms in an unnatural and uncomfortable position, leading to fatigue and muscle strain. Additionally, due to the counter's height and the forced distance he must maintain, he is required to lean his torso forward in a risky manner, compromising his stability and increasing the likelihood of experiencing pain or even losing his balance. This barrier not only

affects his comfort but significantly limits his ability to operate independently at the branch. The discomfort and physical effort required to complete a transaction dissuades him from visiting Banco Popular's Santa Rosa branch, as he knows that the infrastructure is not designed to meet his mobility needs. The lack of accessibility discourages him from managing his financial transactions on equal terms, turning what should be a simple process into a frustrating, uncomfortable, and non-inclusive experience.

51.3. The barriers at the Santa Rosa branch can be eliminated by implementing a customer service counter that meets accessibility standards, allowing individuals with limited mobility to use it effortlessly. The counter height is adjusted to a level that enables comfortable interaction with staff, and the space beneath it is sufficient to allow mobility devices to approach without obstruction. By making these adjustments, Mr. Hernandez manages his transactions more easily, without experiencing discomfort or requiring external assistance. As a result, he no longer feels dissuaded from visiting and chooses to go, knowing that he can access the services without difficulty.

52. Mr. Walberto Hernandez views Bayamón as a lively city that offers a diverse selection of open spaces for relaxation and outdoor enjoyment. The accessibility of its parks and recreational areas makes it an inviting place for both residents and visitors seeking leisure opportunities. A location he finds particularly interesting is situated close to the Bayamón Center branch, which adds to its convenience. Being nearby, it easily fits into his schedule without requiring extra travel time, allowing him to make the most of his visit while moving through the area with ease. This provides a convenient opportunity to

handle banking transactions without disrupting his plans. Nonetheless, he is aware that the establishment has architectural barriers, which make him feel dissuaded from going, as his mobility is limited, and any obstacle may pose a significant challenge to his movement and comfort. The barriers he is aware of are:

- 52.1. Excessive Counter Height That Hinders Accessibility: Mr. Walberto Hernandez faces a significant barrier when trying to use the transaction and customer service counter at the Bayamón Center branch, as its excessive height is not designed for individuals with mobility limitations. This lack of accommodation prevents him from conducting his banking transactions efficiently, creating unnecessary difficulties in every interaction with the bank staff. His mobility limitations make it impossible for him to reach the counter without exerting excessive physical effort and experiencing significant discomfort. To hand over documents, receive cash, or communicate with bank staff, he is forced to stretch beyond his natural range of motion, causing strain in his arms, shoulders, and back. The need to force his posture in an attempt to reach the counter worsens the situation, resulting in constant discomfort and further restricting his movements. This physical barrier not only causes him pain and fatigue but also puts his stability and balance at risk, increasing the likelihood of an accident or injury. As a result, Mr. Hernandez feels dissuaded from visiting Banco Popular's Bayamón Center branch, as he knows the counter's design does not accommodate his mobility limitations. The lack of accessibility creates a barrier that prevents him from interacting independently with bank staff, forcing him to rely on assistance for tasks he should be able to handle on his own. This unequal access makes his banking experience

unnecessarily difficult and frustrating, reinforcing his reluctance to visit the branch and access the financial services he needs.

- 52.2. Lack of Space Beneath the Counter Preventing Proper Access: Mr. Walberto Hernandez also faces another major obstacle: the absence of open space beneath the counter at the Bayamón Center branch. This lack of inclusive design prevents him from getting close enough to conduct his transactions comfortably and safely, severely limiting his access to banking services. Since he uses a mobility device, the inability to get close to the counter forces him to operate from a restricted distance, further complicating his movements. The absence of a clear area beneath the counter prevents him from positioning himself properly, requiring him to lean forward uncomfortably or stretch excessively to hand over documents or receive cash. This forced posture causes significant discomfort, leading to muscle fatigue and unnecessary strain that affects his well-being. Additionally, the unnatural position he must maintain compromises his stability, increasing the risk of losing his balance or experiencing physical strain. As a result, Mr. Hernandez feels dissuaded from going to the Bayamón Center branch, knowing that the counter's design does not take his mobility limitations into account. The absence of accessibility features acts as an obstacle, making it impossible for him to interact with the staff independently and requiring him to depend on others for tasks he should be able to handle on his own. This restricted access unnecessarily complicates his banking experience, causing frustration and reinforcing his hesitation to visit the branch and use the financial services available to him.

52.3. The barriers on the property could be eliminated by redesigning the counter to allow equal access for all customers, regardless of their mobility needs. Lowering the counter to an accessible height and ensuring adequate clearance beneath it would allow customers using scooters or wheelchairs to approach without limitations. This would not only have a positive impact on Mr. Hernandez's experience but also benefit anyone with mobility limitations who visits the branch. Eliminating these barriers ensures that all customers can conduct their transactions comfortably, safely, and independently, without needing assistance for basic banking services.

53. Mr. Walberto Hernandez considers that Bayamón provides both residents and visitors with easy access to green areas, making it an attractive place for leisure and outdoor activities. One of the sites he wishes to visit is located very close to the Plaza Del Sol branch of Banco Popular. The presence of this branch in a strategic location is an advantage for those who want to manage their finances without complications while enjoying the city. However, he knows that the establishment has architectural barriers, which make him feel dissuaded from going, as his limited mobility requires him to rely on an accessible environment to move easily and safely. The barriers he is aware of are:

53.1. Inadequate Counter Height That Hinders Accessibility: Mr. Walberto Hernandez faces significant difficulty when trying to use the transaction and customer service counter at the Plaza Del Sol branch, as its excessively high design prevents him from operating comfortably. Due to his mobility limitations, he struggles to reach the counter without experiencing considerable strain and discomfort. This barrier turns simple tasks, such as handing over documents, receiving cash, and

communicating with staff, into constant challenges, preventing him from completing transactions independently. As a result, he is forced to rely on assistance from others, which restricts his ability to manage his banking needs without help. This situation negatively impacts his independence and comfort when handling financial matters. For this reason, Mr. Hernandez feels dissuaded from visiting the Plaza Del Sol branch, as he is aware that the counter's design does not accommodate his mobility restrictions. The lack of accessibility functions as a significant obstacle, preventing him from interacting with bank staff without depending on third-party assistance.

- 53.2. Lack of Space Under the Counter That Prevents Proper Access: Mr. Walberto Hernandez notices that the transaction and customer service counter at the Plaza Del Sol branch does not have open space underneath, making it impossible for him to get close enough to complete his transactions safely and comfortably. Since he relies on a mobility device, the lack of sufficient space prevents him from positioning himself correctly, forcing him to adopt uncomfortable postures or stretch beyond his natural capacity to carry out his transactions. This physical obstacle directly impacts his ability to access bank services, as it compromises his well-being and limits his independence in managing his financial needs. As a result, Mr. Hernandez feels dissuaded from visiting the Plaza Del Sol branch, knowing that the counter's infrastructure does not accommodate his mobility requirements. This limitation unnecessarily complicates his banking experience, causing frustration and reinforcing his reluctance to visit the branch and utilize the financial services he needs.

53.3. The barriers at the Plaza Del Sol branch could be eliminated by modifying the customer service counter to make it fully accessible. This includes lowering it to a height that is reachable from a seated position and ensuring that there is sufficient space underneath for customers using mobility devices to approach without obstacles. These changes prevent Mr. Hernandez from having to stretch uncomfortably or adopt postures that could affect his well-being during his transactions. Improving the accessibility of the space not only enhances his experience at the branch but also promotes an inclusive environment where all individuals can exercise their independence without physical barriers limiting their access to banking services.

54. Mr. Walberto Hernandez views Bayamón as a vibrant city that offers a diverse range of outdoor spaces for relaxation and leisure. A location that particularly catches his attention is near the Río Hondo branch, which adds to its convenience. However, he is aware of architectural barriers at the branch, which make him feel dissuaded from going due to his limited mobility. The barriers he is aware of are:

54.1. Excessive Counter Height That Hinders Accessibility: Mr. Walberto Hernandez recognizes that the transaction and customer service counter at the Río Hondo branch is too high, making it difficult for him to use comfortably. His mobility limitations make it challenging to reach the surface without excessive effort, causing discomfort and restricting his movements. This barrier turns simple tasks, such as handing over documents, receiving cash, and communicating with staff, into complicated processes that prevent him from managing his transactions independently. As a result, he is forced to rely on assistance from others, reducing

his ability to handle his banking needs on his own. This limitation makes him feel dissuaded from visiting the branch, as the counter's design does not accommodate his accessibility needs, creating unnecessary obstacles that complicate his experience.

54.2. Lack of Space Under the Counter That Prevents Proper Access: Mr. Walberto Hernandez recognizes that the transaction and customer service counter at the Río Hondo branch lacks sufficient open space underneath, preventing him from getting close enough to complete his transactions safely and comfortably. Since he uses a mobility device, the lack of proper clearance restricts his ability to position himself correctly, forcing him into an uncomfortable and unnatural posture during interactions with bank staff. This barrier significantly affects his ability to access banking services, making his experience much more difficult. As a consequence, he feels dissuaded from visiting the branch, as the space is not designed to accommodate his mobility needs, limiting his independence and adding frustration to the process.

54.3. The barriers at the Río Hondo branch could be eliminated by designing a customer service area that prioritizes accessibility for all individuals, especially those with mobility limitations. A counter at an accessible height, with open space underneath, allows Mr. Hernandez and other customers with similar needs to access services without restrictions, ensuring that they can conduct their transactions comfortably and without additional effort. These modifications not only optimize the customer experience but also reinforce the branch's responsibility to provide equitable service for all. Ensuring an accessible

environment is not just a functional improvement but a necessary step toward inclusion and the elimination of barriers that impact personal independence.

55. Mr. Walberto Hernandez considers Bayamón a lively city that provides numerous outdoor spaces for relaxation and recreation. Its thoughtfully planned infrastructure allows both locals and visitors to enjoy accessible green areas, making it an appealing destination for those who value nature and open environments. One of the points of interest he wants to explore is located near the Rexville Town Center branch of Banco Popular, allowing him to access banking services without hassle. Having a nearby branch provides him with the convenience of handling any necessary financial transactions during his stay in Bayamón. However, he knows that the establishment has architectural barriers, which make him feel dissuaded from going, as his reduced mobility makes it challenging to navigate barriers that could hinder his ability to enter and move through the space comfortably and safely. The barriers he is aware of are:

- 55.1. Inappropriately Tall Transaction and Customer Service Counter: Mr. Walberto Hernandez is aware that the transaction and customer service counter at the Rexville Town Center branch is too tall, making it difficult for him to use properly. Due to his mobility limitations, he is unable to reach the surface without experiencing discomfort and excessive physical strain. This barrier makes simple tasks like handing over documents, receiving cash, and communicating with staff unnecessarily difficult, preventing him from handling his transactions independently. As a result, he is forced to rely on assistance from others, reducing his ability to manage his banking needs on his own. This lack of accessibility

makes him feel dissuaded from visiting the branch, as the counter's design does not accommodate his needs, creating unnecessary difficulties.

55.2. Lack of Space Under the Counter That Prevents Proper Access: Mr. Walberto Hernandez is aware that the transaction and customer service counter at the Rexville Town Center branch does not provide enough open space underneath, preventing him from getting close enough to carry out his transactions safely and comfortably. Since he uses a mobility device, the lack of proper clearance restricts his ability to position himself correctly, forcing him to stretch uncomfortably or remain in an unnatural posture. This limitation significantly affects his access, as it reduces his comfort and prevents him from operating independently. As a consequence, he feels dissuaded from visiting the branch, knowing that the current layout does not accommodate his mobility needs, making the banking experience unnecessarily complicated and frustrating.

55.3. The barriers at the Rexville Town Center branch could be eliminated by transforming the transaction counter into a truly accessible space, with an appropriate height and sufficient clearance underneath to allow individuals using mobility devices to approach without difficulty. This eliminates the need for Mr. Hernandez to stretch uncomfortably or rely on third parties for basic banking transactions. Implementing these changes benefits not only him but also other customers with limited mobility who require an environment that enables them to operate independently. Accessibility is a right, and ensuring it in customer service spaces is essential to providing equal opportunities for all users.

56. Mr. Walberto Hernandez considers Bayamón a city that offers a variety of spaces for relaxation and outdoor activities, making it an appealing place for both residents and visitors. The accessibility of certain areas allows for a more enjoyable and practical experience when navigating the city. A location he is interested in visiting is conveniently situated near the Bayamón Oeste branch, providing him with a practical option for handling his financial needs. Having access to a branch in this area ensures a seamless experience, allowing him to manage his transactions efficiently while making the most of his time without unnecessary concerns. However, he is aware that the establishment presents architectural barriers, which make him feel dissuaded from visiting. Given his limited mobility, he depends on accessible spaces, and any obstacle creates significant challenges that hinder his ability to move freely and navigate the area comfortably. The barriers he is aware of are:

56.1. Excessively High Transaction and Customer Service Counter: Mr. Walberto Hernandez is aware that the excessive height of the transaction and customer service counter presents a significant obstacle for him. The counter is too high for him to use comfortably, making it difficult to reach without considerable effort. This situation causes strain and discomfort, making simple tasks such as handing over documents, receiving cash, and communicating with staff unnecessarily complicated. As a result, he struggles to complete transactions on his own and must rely on others for assistance, which limits his independence. Because of this barrier, he feels dissuaded from visiting the branch, as the experience becomes physically challenging and frustrating.

- 56.2. Counter Without Adequate Clearance: Mr. Walberto Hernandez is aware that the lack of open space beneath the transaction and customer service counter creates a major accessibility challenge. Since he uses a mobility device, the absence of proper clearance prevents him from positioning himself close enough to complete transactions safely and comfortably. This forces him to stretch beyond a comfortable reach or remain in an awkward position, increasing his discomfort and making the process unnecessarily difficult. The inability to properly align himself also restricts his ability to interact effectively with staff and conduct transactions independently. Due to this barrier, he feels dissuaded from visiting the branch, as the layout does not accommodate his needs and makes his banking experience far more demanding than it should be.
- 56.3. The barriers on the property could be eliminated by redesigning the service counter to make it accessible to all individuals, regardless of their mobility limitations. Adjusting the counter height and providing adequate clearance beneath it allows Mr. Hernandez to access services without difficulty, avoiding awkward postures or the need to request assistance to complete his transactions. Ensuring accessibility in this space not only enhances his experience but also contributes to creating a more equitable environment where all customers can operate independently. Inclusion in customer service spaces should be a priority, and eliminating these architectural barriers is a fundamental step toward achieving that goal.

Banco Popular's Cabo Rojo Branch

57. Mr. Uriel Sepúlveda is interested in traveling to Cabo Rojo, as he wants to enjoy the tranquility of its coastal landscapes and explore its iconic salt flats, known for their unique hues and ecological significance. Additionally, he wants to visit the Cabo Rojo branch, which is located nearby and where he wants to carry out transactions that he considers necessary for his financial stability and organization. However, he is aware that there are architectural barriers at the establishment, which raises concerns for him, as any obstacle presents a significant challenge due to his reduced mobility and reliance on a support device for movement. This makes him feel dissuaded from visiting, as he fears that the lack of proper accommodations may hinder his access and negatively impact his experience at the location. The barriers are:

- 57.1. Extremely Tall Transaction and Customer Service Counter: Mr. Uriel is aware that the counter at the Cabo Rojo branch is excessively high, making it difficult for him to use effectively. The counter's height makes it difficult for him to position himself comfortably and access the service area with ease. This barrier not only hinders his ability to exchange documents, sign paperwork, or complete necessary transactions but also forces him into an awkward posture, making access even more challenging. The lack of a counter at an accessible height prevents him from completing his transactions independently, requiring him to rely on others for assistance with tasks. As a result, he feels dissuaded from visiting the branch, as the lack of accessibility makes his banking experience unnecessarily difficult.
- 57.2. Counter Without Clearance: Mr. Uriel Sepúlveda is aware that the counter at the Cabo Rojo branch lacks open space beneath it, preventing a person using a

mobility support device from properly approaching the service area. This lack of accessibility makes it difficult for him to position himself correctly and the absence of adequate space under the counter forces him to remain in an uncomfortable posture, affecting his comfort and safety while conducting his banking operations. As a result, this obstacle turns a simple task into a frustrating and exhausting experience, further hindering his access to the financial services he needs. This makes him feel dissuaded from visiting the branch, as the design does not accommodate his mobility needs, making the process unnecessarily challenging.

- 57.3. The barriers on the property could be eliminated by lowering the height of the counter to an accessible level and ensuring that there is an open space underneath, allowing individuals who use mobility support devices to properly approach the service area. Additionally, providing an alternative service station at a compliant height helps ensure that all customers, regardless of their mobility needs, can conduct their transactions independently and comfortably.

Banco Popular's Caguas Branches

58. Mr. Carlos Molina is interested in visiting Caguas for its tropical climate and its cultural and natural attractions. Known for its commitment to history, nature, and vibrant community spaces, Caguas offers destinations such as the Jardín Botánico y Cultural de Caguas William Miranda Marín, a vast green space ideal for relaxation, exploration, and learning about Puerto Rico's biodiversity. Additionally, the Catedral Dulce Nombre de Jesús stands as a significant historical and architectural landmark, reflecting the city's deep-rooted heritage. Unlike other urban centers, Caguas blends tradition with modernity,

making it an appealing destination for those who enjoy both cultural and outdoor experiences. As he has already mentioned before, there are many things that interest him about Caguas. He is particularly drawn to its gardens, historical sites, and tropical landscapes. One of the places he is interested to visit is very close to the Condadito branch of Banco Popular, which allows him to conveniently access its financial services. Having a branch in this area is an advantage for those, like him, who want to conduct his banking transactions quickly and securely while exploring everything Caguas has to offer. However, Mr. Carlos is aware that the establishment has architectural barriers that directly affect him, which makes him feel dissuaded from going, as these obstacles hinder his access and compromise his comfort during the visit. The presence of these barriers poses a significant challenge to his mobility, preventing him from moving safely and conducting his transactions independently. The barriers are:

- 58.1. Extremely Tall Transaction and Customer Service Counter: Mr. Carlos is aware that the transaction and customer service counter at the Condadito branch is uncomfortably high, making it challenging for him to use efficiently. The counter's excessive height makes it difficult for him to position himself comfortably or access the service area smoothly. This presents a major obstacle, not only in physically reaching the counter but also in engaging effectively with the staff, ultimately complicating the interaction. This limitation not only restricts his ability to hand over documents, receive cash, or complete other transactions but also forces him into an awkward posture that further complicates his access. This lack of accessibility turns a simple banking transaction into a frustrating and exhausting experience, making it harder for him to access the financial services he

needs. As a result, he feels dissuaded from visiting the branch, as these obstacles make his banking experience unnecessarily difficult and inconvenient.

58.2. Counter Without Clearance: Mr. Carlos is aware that the counter at the Condadito branch lacks open space beneath it, preventing a person using a mobility support device from properly approaching the service area. Without adequate clearance, he is unable to position himself correctly, which significantly affects his ability to interact with staff and conduct his transactions comfortably. The absence of sufficient space under the counter forces him to remain in an uncomfortable posture, compromising his safety and making it difficult to manage his financial needs independently. Instead of being able to complete his transactions efficiently, he faces unnecessary physical strain and logistical obstacles. As a result, this barrier not only hinders his ability to use the services provided by the branch but also undermines his autonomy by making him dependent on others for basic banking tasks. Because of these accessibility challenges, he feels dissuaded from visiting the branch, knowing that the current layout does not accommodate his mobility needs and creates unnecessary difficulties.

58.3. The barriers on the property could be eliminated by installing a customer service counter at an accessible height, allowing individuals who use mobility devices to reach the service area without difficulty. Additionally, it is essential to ensure that the counter has open space beneath it, allowing customers in wheelchairs to position themselves comfortably without being forced to stretch or adopt awkward postures. These adjustments not only facilitate access to financial services but also allow Mr. Carlos to conduct his transactions independently,

without relying on third parties. Providing accessibility in this space is not just a matter of convenience but a fundamental measure to ensure equity and inclusion for all individuals.

59. Mr. Carlos Molina finds Caguas appealing for its warm climate and rich blend of cultural and natural attractions, as he thinks that the city harmoniously merges its historical roots with contemporary elements, creating a perfect setting for those who enjoy both heritage and outdoor activities. A location he wants to explore is situated near the Plaza Centro Sur branch of Banco Popular, which provides him with convenient access to essential financial services. However, Mr. Carlos is aware that architectural barriers within the establishment create significant obstacles for him, leaving him dissuaded from going. The presence of such obstacles makes it difficult for him to navigate the area safely and conduct his transactions without external assistance. The barriers are:

- 59.1. Excessively High Transaction and Customer Service Counter: Mr. Carlos is aware that the transaction and customer service counter at the Plaza Centro Sur branch is unreasonably high, making it difficult for him to use effectively. The counter's height prevents him from positioning himself comfortably and reaching the service area with ease, creating a significant obstacle to both communication with staff and the completion of his banking transactions. This design flaw not only hinders his ability to hand over documents independently but also forces him to rely on assistance from others. The lack of an accessible counter diminishes his autonomy, turning a simple banking task into a frustrating and exhausting experience. As a result, he feels dissuaded from visiting the branch, knowing that

the counter's design does not accommodate his mobility needs, making the banking process unnecessarily difficult.

59.2. Counter Without Adequate Clearance: Mr. Carlos is also aware that the counter at the Plaza Centro Sur branch lacks the necessary open space beneath it, preventing him from properly positioning himself at the service area. Since he depends on a mobility device, the absence of adequate clearance makes it nearly impossible for him to approach the counter comfortably, complicating his interactions with staff and his ability to complete transactions. This physical barrier forces him into awkward and uncomfortable positions or requires him to rely on assistance, impacting both his safety and independence, additionally, transforms a routine banking visit into an unnecessarily complicated and restrictive process. Due to these challenges, he feels dissuaded from returning to the branch, as the current setup fails to support his mobility needs.

59.3. The barriers on the Plaza Centro Sur branch could be eliminated by modifying the customer service counter to meet accessibility standards. This involves lowering it to an appropriate height to accommodate wheelchair users and ensuring that there is open space beneath it, allowing them to approach without limitations. These improvements make the service area safer and more comfortable for customers with mobility limitations, preventing the need for assistance with basic transactions. Ensuring accessibility at the counter is an essential step in allowing all individuals, regardless of their mobility needs, to exercise their independence when accessing essential banking services.

60. Mr. Carlos Molina is captivated by Caguas for its variety of cultural and natural attractions. One of the sites he wants to visit is in proximity to the Caguas Pueblo branch of Banco Popular, allowing him easy access to banking services while exploring the area. The existence of this branch provides a convenient benefit for individuals like him who prioritize efficiency and security in managing their financial transactions. However, Mr. Carlos is conscious of the fact that the establishment has architectural barriers that directly impact him, making him feel dissuaded from visiting, as these physical obstacles present a considerable challenge to his mobility, making it more difficult for him to move around independently and access the services he needs without undue hardship. The barriers are:

60.1. Extremely Tall Transaction and Customer Service Counter: Mr. Carlos is aware that the transaction and customer service counter at the Caguas Pueblo branch is excessively high, making it difficult for him to use comfortably. Due to his mobility limitations, he cannot reach the service area without difficulty, creating obstacles when handing over documents, receiving cash, or communicating with staff. This barrier prevents him from conducting transactions independently, requiring him to rely on others. The lack of an accessible counter affects his autonomy and makes his banking experience uncomfortable and exhausting. As a result, he feels dissuaded from visiting the branch, as the counter's design does not accommodate his mobility needs, making routine tasks unnecessarily challenging.

60.2. Counter Without Clearance: Mr. Carlos is aware that the counter at the Caguas Pueblo branch lacks open space beneath it, preventing him from properly

approaching the service area. The absence of space under the counter prevents him from positioning himself correctly, causing discomfort and making it harder to access banking services. This barrier significantly limits his comfort and safety, restricting his ability to complete transactions without external assistance. As a result, he feels dissuaded from visiting the branch, as the current layout does not support his mobility needs, turning simple tasks into frustrating and physically demanding experiences.

60.3. The barriers on the Caguas Pueblo could be eliminated by redesigning the customer service counter to provide equal access for all customers, regardless of their mobility needs. Lowering the counter to an accessible height and ensuring adequate open space beneath it allows customers using wheelchairs to position themselves correctly without limitations. These modifications not only improve Mr. Carlos's experience but also benefit anyone with mobility challenges who visits the branch. Implementing these changes ensure that customers can complete their transactions comfortably, safely, and independently, without unnecessary reliance on assistance.

61. Mr. Carlos Molina appreciates Caguas for its warm climate and diverse cultural and natural offerings, he is especially drawn to its botanical gardens, cultural landmarks, and vibrant natural surroundings. Furthermore, he is interested in visiting a location close to the Ralph Food Warehouse Bairoa branch of Banco Popular, which provides a practical way for him to manage his banking while also enjoying his visit to Caguas. However, Mr. Carlos is aware that some architectural obstacles within the Ralph Food Warehouse Bairoa branch present major challenges, causing him to feel dissuaded from visiting.

These barriers hinder his ability to access the facility with ease and safety, restricting his movement and making it difficult to complete his transactions independently. The barriers include:

- 61.1. Extremely Tall Transaction and Customer Service Counter: Mr. Carlos is aware that the transaction and customer service counter at the Ralph Food Warehouse Bairoa branch is excessively high, making it difficult for him to use effectively. This obstacle not only makes it harder for him to communicate with the staff but also compels him into an awkward position, making access even more challenging. Without a counter at an accessible height, he encounters unnecessary obstacles when trying to complete transactions independently, negatively impacting both his experience and his autonomy. As a result, he feels dissuaded from visiting the branch.
- 61.2. Counter Without Clearance: Mr. Carlos is aware that the counter at the Ralph Food Warehouse Bairoa branch lacks open space beneath it, preventing him from positioning himself properly for banking transactions. Due to his mobility device, he cannot approach the counter comfortably, forcing him to rely on assistance from others to interact with staff or complete transactions. This lack of clearance limits his independence, making a simple task unnecessarily inconvenient and difficult. The barrier creates an obstacle that not only affects his autonomy but also makes his overall experience at the branch frustrating. As a result, he feels dissuaded from visiting, knowing the design does not accommodate his needs.
- 61.3. The barriers on the Ralph Food Warehouse Bairoa branch could be eliminated by transforming the customer service counter into a truly accessible space, with an

appropriate height and sufficient open space beneath it. This allows individuals using mobility devices to approach without obstacles and complete their transactions without assistance. Removing these barriers facilitate interaction with staff and ensure that all customers can manage their banking needs independently. Accessibility in service areas is a right and must be a priority to provide equal opportunities for all individuals visiting the branch.

62. Mr. Carlos Molina is also interested in visiting a location near the San Alfonso branch of Banco Popular, where he easily manages his financial needs while enjoying his time in the city. The availability of a branch in this area is an added convenience for individuals who, like him, need secure and quick banking solutions. However, Mr. Carlos is dissuaded from visiting due to architectural barriers that significantly hinder his mobility.

The barriers are:

- 62.1. Extremely Tall Transaction and Customer Service Counter: Mr. Carlos is aware that the transaction and customer service counter at the San Alfonso branch is excessively high. The height of the counter prevents him from positioning himself comfortably or reaching the service area without effort, restricting his ability to complete banking processes independently. This barrier forces him to rely on others for simple tasks, compromising his autonomy and making the banking experience frustrating. As a result, he feels dissuaded from visiting the branch, knowing that the counter's design does not accommodate his mobility needs.
- 62.2. Counter Without Clearance: Mr. Carlos is aware that the counter at the San Alfonso branch lacks open space beneath it, preventing him from properly approaching the service area. Since he cannot position himself correctly with his

mobility device, his access to banking services is limited, making interactions with staff, transactions or basic banking processes more challenging. The absence of accessible space beneath the counter represents a significant obstacle to his independence and comfort. As a result, he feels dissuaded from visiting the branch, knowing that the lack of clearance makes his banking experience unnecessarily difficult and uncomfortable.

62.3. The barriers on the San Alfonso branch could be eliminated by implementing a customer service area that prioritizes accessibility for all individuals, especially those with mobility limitations. Adjusting the counter height to an accessible level and ensuring that there is open space beneath it allow customers using wheelchairs to position themselves comfortably and safely. These improvements not only enhance Mr. Carlos's experience but also reinforce the branch's commitment to equity and inclusion. Adapting the environment to meet the needs of all individuals is not just a matter of accessibility but a reflection of respect for the dignity and independence of all customers.

63. As he has already mentioned before, there are many things that interest Mr. Carlos Molina about Caguas. He looks forward to exploring areas near the Las Catalinas branch of Banco Popular, where he could access financial services as part of his trip. A branch in this location provides a valuable resource for him. However, Mr. Carlos is aware that architectural barriers within the establishment present substantial challenges, leaving him dissuaded from going, as these obstacles prevent him from safely navigating the space, ultimately making it difficult for him to manage his banking needs independently. The barriers are:

- 63.1. Extremely Tall Transaction and Customer Service Counter: Mr. Carlos is aware that the transaction and customer service counter at the Las Catalinas branch is excessively high, creating a barrier to accessibility. The height of the counter prevents him from positioning himself comfortably and communicating with staff without difficulty, making it harder to manage his transactions independently. This barrier not only affects his autonomy but also turns a simple banking task into an uncomfortable and exhausting experience. As a result, he feels dissuaded from visiting the branch, as the counter's design does not accommodate his mobility needst.
- 63.2. Counter Without Clearance: Mr. Carlos is aware that the counter at the Las Catalinas branch lacks open space beneath it, preventing him from properly approaching the service area. The lack of accessibility in this area affects his mobility and complicates his interaction with staff, causing discomfort and making it difficult for him to complete his transactions independently. As a result, he feels dissuaded from visiting the branch, knowing that the lack of clearance makes his banking experience unnecessarily challenging and uncomfortable.
- 63.3. The barriers on the Las Catalinas branch could be eliminated by adjusting the design of the counter to make it fully accessible. This includes lowering it to a level that enables a smooth interaction with staff from a seated position and ensuring that there is sufficient space beneath it for customers using wheelchairs to approach without difficulty. These improvements prevent Mr. Carlos from having to stretch uncomfortably or adopt awkward postures while conducting his transactions. Enhancing the accessibility of the space not only improves his

experience at the branch but also fosters a more inclusive environment where all individuals can operate without physical barriers limiting their access to banking services.

64. Mr. Carlos is interested in visiting a location near the Plaza Los Prados branch of Banco Popular, as its proximity offers him great convenience. The branch's location allows him to easily incorporate it into his daily routine, making it a practical option for managing his banking needs while going about his day. This accessibility ensures that he can efficiently complete his transactions without having to make significant detours, saving him both time and effort. However, Mr. Carlos is dissuaded from visiting due to architectural barriers that limit his ability to move safely and comfortably through the space. The barriers are:

- 64.1. Extremely Tall Transaction and Customer Service Counter: Mr. Carlos is aware that the transaction and customer service counter at the Plaza Los Prados branch is excessively high, making it difficult for him to use effectively. The inability to comfortably reach the service area creates obstacles when interacting with staff or accessing banking services. The lack of accessibility in this area represents a considerable limitation to his independence and turns a simple task into an unnecessarily complicated process. As a result, he feels dissuaded from visiting the branch.
- 64.2. Counter Without Clearance: Mr. Carlos is aware that the counter at the Plaza Los Prados branch lacks open space beneath it, preventing him from properly positioning himself with his mobility device. This affects his ability to access banking services. The lack of accessibility compromises his comfort and safety

within the establishment. As a result, he feels dissuaded from visiting the branch, as the lack of clearance creates unnecessary challenges and makes his banking experience uncomfortable.

- 64.3. The barriers on the Plaza Los Prados branch could be eliminated by redesigning the customer service counter to make it accessible to all individuals, regardless of their mobility limitations. Adjusting the counter height and providing adequate open space beneath it allow Mr. Carlos to access services without difficulty, avoiding uncomfortable postures or the need to request assistance to complete his transactions. Ensuring accessibility in this space not only improves his experience but also contributes to creating a more equitable environment where he can manage his banking needs independently. Inclusion in customer service areas should be a priority, and eliminating these architectural barriers represents a fundamental step toward achieving that goal.

Banco Popular's Camuy Branch

65. Mr. Walberto Hernández is very interested in traveling to Camuy, as he has heard about its renowned gastronomic scene, where he can enjoy a diverse culinary offering, especially fresh seafood and traditional dishes that have made the municipality famous. In addition to savoring these delicacies, he also wants to take advantage of the proximity to visit the Banco Popular branch in Camuy, where he needs to carry out some banking transactions that allow him to better manage his resources and take care of important financial matters during his stay. However, Mr. Walberto is aware that there are architectural barriers at the establishment, which makes him feel dissuaded from going, as he fears that the lack of adequate accessibility may hinder his entry and negatively

impact his experience at the location, given that his mobility is reduced and any obstacle represents a significant challenge. The barriers are:

- 65.1. Excessively Tall Counter: Mr. Walberto is aware that the counter at the Camuy branch is excessively high, making it difficult for him to use effectively. The height of the counter prevents him from positioning himself comfortably and reaching the service area without difficulty, creating a significant barrier to communication with the staff. This limitation not only restricts his ability to hand over documents, receive cash, or complete other transactions but also forces him to rely on others for assistance. The lack of an accessible counter prevents him from operating independently within the branch, limiting his autonomy when managing his banking needs.
- 65.2. Counter Without Clearance Underneath: Mr. Walberto is aware that the counter at the Camuy branch lacks open space beneath it, preventing a person using a wheelchair from properly approaching the service area. This lack of accessibility makes it difficult for him to position himself correctly and creates a barrier to effective communication with the staff and the completion of his transactions. The absence of sufficient space under the counter forces him to remain in an uncomfortable position, affecting his comfort and safety while conducting banking operations. As a result, this obstacle turns a routine banking transaction into a frustrating and exhausting experience, further increasing the challenges he faces in accessing the financial services he needs.
- 65.3. The barriers on the property could be eliminated by modifying the counter to comply with accessibility standards, ensuring that it is at an appropriate height for

individuals using wheelchairs and includes open space underneath to allow proper approach. Lowering the counter to a reasonable level enables Mr. Walberto to comfortably reach the service area, hand over documents, receive cash, and complete transactions independently. Additionally, having a designated space specifically designed to facilitate his access allows him to conduct his banking transactions without obstacles or discomfort, providing him with a safer, more efficient, and dignified experience.

Banco Popular's Canóvanas Branch

66. Mrs. Cepeda, a resident of Canóvanas, likes Banco Popular's services for her financial transactions. As a regular user of the Canóvanas Outlet branch, she expects to receive the same level of service and accessibility as any other customer. To her, Banco Popular stands out as a trusted financial institution recognized for its stability, extensive network, and dedication to customer service, offering a wide range of financial products tailored to diverse needs. However, since November, 2024, she is aware that architectural barriers at the Canóvanas Outlet branch create significant difficulties in moving around and accessing services by her for their mobility devices. These obstacles not only limit her ability to navigate the branch comfortably but also make routine banking tasks unnecessarily challenging. As a result, she feels discouraged from visiting the branch. The barriers are:

- 66.1. Inaccessible Counters: Mrs. Mrs. Bonnelis Cepeda is aware that the transaction and customer service counters at Banco Popular's Canóvanas Outlet branch present significant challenges for individuals with limited mobility in their upper limbs. The excessive height of the counters require her to raise her only functional

arm uncomfortably high, making it difficult to sign documents, receive cash, or handle her card independently. Since she cannot use both hands, securely picking up or placing down objects could be a struggle, increasing the risk of dropping money, documents, or personal belongings. Additionally, the absence of an accessible counter with adequate support space adds to these difficulties, forcing her to hold items for extended periods without relief, leading to physical strain and fatigue. These accessibility barriers make banking transactions unnecessarily challenging and limit the ability to complete them comfortably and independently, ultimately discouraging her from visiting the branch.

- 66.2. The barriers at Banco Popular's Canóvanas Outlet branch could be eliminated by modifying the transaction and customer service counters to comply with ADA accessibility standards. This involve lowering the counters to an appropriate height, allowing individuals with limited upper-body mobility, like Mrs. Bonnelis Cepeda, to interact comfortably with staff. A lower counter enables her to sign documents, handle her card, and complete transactions without unnecessary physical strain. These modifications ensure a more inclusive and accessible banking environment, allowing individuals with mobility impairments to conduct their financial activities independently and with ease.

Banco Popular's Carolina Branches

67. Mr. Figueroa enjoys going to Los Colobos Shopping Center because he appreciates the variety of establishments and restaurants, making each visit a pleasant experience. When he goes to the shopping center, he wants to visit the Banco Popular de Puerto Rico branch and access its services comfortably and independently. However, since October 2024, he

has had knowledge of several architectural barriers at the branch that make this difficult. Due to his health condition and reliance on a wheelchair, he is concerned about experiencing discrimination and unequal treatment compared to individuals without disabilities. As a result, he feels discouraged from going to the branch. Mr. David Figueroa is aware of the following architectural barriers at the Banco Popular de Puerto Rico branch at Los Colobos Shopping Center:

- 67.1. Inaccessible Transaction and Customer Service Counters: Mr. David Figueroa is aware that the transaction and customer service counters at the Banco Popular de Puerto Rico branch at Los Colobos Shopping Center are too tall for a person in a wheelchair to use effectively. Due to his quadriplegia, he is unable to stand or raise his arms high enough to reach the counter, preventing him from interacting independently with the establishment's staff. This barrier makes it difficult for him to make payments, receive assistance, and complete transactions without relying on others, impacting his independence and ability to access the services at the location. As a result, he feels discouraged from going to the branch.
- 67.2. Lack of Accessible Counter Space for Wheelchair Users: Mr. David Figueroa is aware that the transaction and customer service counters at the Banco Popular de Puerto Rico branch at Los Colobos Shopping Center do not have sufficient depth to allow a frontal approach with his wheelchair. This lack of space prevents him from properly positioning himself in front of the counter, making it difficult to complete transactions comfortably and safely. His limited mobility makes it impossible for him to stretch forward easily to sign documents, hand over his identification, or receive items, making each transaction uncomfortable and

physically demanding. As a result, he must rely on third-party assistance to access the establishment's services, which impacts his independence and discourages him from going to the branch.

67.3. The barriers at Branch Los Colobos Shopping Center could be eliminated by modifying the transaction and customer service counters to comply with ADA accessibility standards. This includes lowering the counters to a height that allows individuals using wheelchairs to comfortably interact with staff, make payments, and receive assistance independently. Additionally, increasing the depth of the counters allows Mr. David Figueroa to properly align himself in front of them, making it easier for him to sign documents, hand over identification, and receive items without unnecessary physical strain. These modifications remove the need for third-party assistance, ensuring that individuals with mobility impairments, like Mr. Figueroa, can conduct their transactions with ease and dignity, fostering a more inclusive and accessible environment.

68. As a client of Banco Popular de Puerto Rico, Mr. David Figueroa enjoys the convenience of the Carolina Highway branch, which is located near Carolina Shopping Court—a place he appreciates for its diverse selection of products, businesses, and dining options. When he goes to Carolina Shopping Court, he expects to enter the bank branch comfortably and handle his transactions independently. However, since January 2025, he has had knowledge of several architectural barriers at the branch that make this difficult. Due to his dependence on a wheelchair for mobility, he knows he encounters obstacles that limit his ability to access the bank's services on equal terms with individuals without disabilities. As a result, he feels discouraged from going to the branch. Mr. David

Figueroa is aware of the following architectural barriers at the Banco Popular de Puerto Rico – Carolina Highway branch:

- 68.1. Tall Bank Host Counter: Mr. David Figueroa is aware that the bank host counter at the Banco Popular de Puerto Rico – Carolina Highway branch, which is gray with a light brown surface, is too tall for a person in a wheelchair to use effectively. Due to his dependence on a wheelchair for mobility, he cannot reach the counter or clearly view the documents or materials presented to him. This barrier makes it difficult for him to communicate with the bank host, receive information properly, and complete his transactions independently. The lack of accessibility at the counter creates frustration and limits his independence. As a result, he feels discouraged from going to the branch.
- 68.2. Bank Host Counter Without Depth For A Frontal Approach: Mr. David Figueroa is also aware that the bank host counter at the Banco Popular de Puerto Rico – Carolina Highway branch does not have sufficient depth to allow a frontal approach with his wheelchair. This lack of space prevents him from positioning himself properly to interact with staff, making it difficult to sign documents, hand over his identification, and receive materials comfortably. His limited mobility prevents him from easily leaning forward, forcing him to exert extra effort just to reach objects on the counter. This barrier makes each transaction uncomfortable and requires third-party assistance, further restricting his access to the establishment's services. As a result, he feels discouraged from going to the branch.

- 68.3. The barriers at Branch Carolina Highway could be eliminated by modifying the bank host counter to meet ADA accessibility standards. This includes lowering the gray counter with a light brown surface to a height that allows individuals using wheelchairs to comfortably reach documents, communicate effectively with staff, and complete transactions independently. Additionally, increasing the depth of the counter enables Mr. David Figueroa to position himself properly in front of it, ensuring that he can sign documents, hand over his identification, and receive materials without excessive physical strain. These modifications remove the need for third-party assistance, allowing individuals with mobility impairments, like Mr. Figueroa, to access services with ease and dignity, fostering a more inclusive and accommodating environment.
69. Banco Popular de Puerto Rico represents strength, quality services, and valuable benefits for Mr. David Figueroa, who holds the institution in high regard. He especially enjoys visiting the Plaza Carolina branch, conveniently located inside Plaza Carolina Shopping Mall, a place he frequently visits for its variety of businesses and restaurants, including some of his favorites such as El Mesón Sandwiches, Chili's Grill & Bar, and T.J. Maxx. When he goes to Plaza Carolina, he expects to enter the bank branch comfortably and handle his transactions independently. However, during his last visit in January 2025, he encountered several architectural barriers that made his experience at the branch difficult. He knows that, due to his disability, which requires him to use a wheelchair for mobility, he faces barriers that create inequality in access to the bank's services compared to individuals without disabilities. Mr. David Figueroa is aware of the following architectural barriers at the Banco Popular de Puerto Rico – Plaza Carolina branch:

- 69.1. Light Gray Transaction And Customer Service Counter That Is Too Tall: When Mr. David Figueroa attempts to conduct transactions at the Banco Popular de Puerto Rico branch in Plaza Carolina, he encounters a transaction and customer service counter that is too tall for him to use effectively. The counter, which is light gray with a darker gray surface, is beyond the reach of a person in a wheelchair. Due to his condition of quadriplegia, he was unable to raise his arms high enough to hand over documents, receive cash, or complete any other transaction at the counter. This barrier forced him to rely entirely on the establishment's staff or a third party to complete his transactions, affecting his independence and making access to services more difficult.
- 69.2. Light Gray Transaction And Customer Service Counter Without Depth For A Frontal Approach: Mr. Figueroa also faces additional challenges when trying to position himself at the counter. The transaction and customer service counter does not have the necessary depth to allow him to approach it frontally with his wheelchair. This lack of space prevents him from positioning himself comfortably and aligning properly with the counter, making interactions with staff difficult. Tasks such as signing documents, presenting identification, and receiving items become complicated because his limited mobility prevents him from leaning forward easily. As a result, every transaction turns into an uncomfortable and physically demanding process.
- 69.3. The barriers at Branch Plaza Carolina could be eliminated by modifying the light gray transaction and customer service counter with a darker gray surface to comply with ADA accessibility standards. This includes lowering the counter to a

height that allows individuals using wheelchairs to easily reach documents, communicate effectively with staff, and complete transactions without assistance. Additionally, increasing the depth of the counter allows Mr. David Figueroa to properly align himself in front of it, enabling him to sign documents, present his identification, and receive materials without unnecessary physical strain. These modifications eliminate the need for third-party assistance, ensuring that individuals with mobility impairments, like Mr. Figueroa, can access services comfortably and independently, fostering a more inclusive and accessible environment.

70. The quality of services, benefits, and reliability of Banco Popular de Puerto Rico make it a valued institution for Mr. David Figueroa. He has a particular appreciation for the Campo Rico branch, conveniently located near Campo Rico Shopping Center, a place he enjoys for its variety of businesses and supermarkets, including Supermercados Econo de Campo Rico, where he finds very affordable prices. As he spends time at Campo Rico Shopping Center, accessing the bank branch comfortably and handling his transactions independently is important to him. However, since October 2024, he has been aware of several architectural barriers at the branch that make access difficult. Due to his dependence on a wheelchair for mobility, he knows he encounters obstacles that limit his ability to access the bank's services on equal terms with individuals without disabilities. As a result, he feels discouraged from going to the branch. Mr. David Figueroa is aware of the following architectural barriers at the Banco Popular de Puerto Rico – Campo Rico branch:

- 70.1. Tall Bank Host Counter: Mr. David Figueroa is aware that the bank host counter at Branch Campo Rico, which is beige with a light brown surface, is too tall for a person in a wheelchair to use effectively. Due to his condition of quadriplegia, Mr. Figueroa cannot raise his arms high enough to interact with the counter, preventing him from handing over documents, receiving information, or completing transactions independently. This barrier forces him to rely entirely on the establishment's staff to conduct his banking tasks, limiting his independence and making access to banking services more difficult.
- 70.2. Bank Host Counter With Insufficient Depth For A Frontal Approach: Mr. David Figueroa is aware that the bank host counter at Branch Campo Rico, which is beige with a light brown surface, does not have enough depth to allow him to approach it frontally with his wheelchair. This lack of space prevents him from positioning himself comfortably in front of the counter, making it difficult to interact effectively with staff and complete tasks such as signing documents or handing over his identification. His limited mobility prevents him from easily leaning forward, turning every transaction into an uncomfortable and physically demanding process. As a result, he feels discouraged from going to the branch.
- 70.3. Bank Host Counter Obstructed By Brochures And Circulars: Mr. David Figueroa is aware that the surface of the bank host counter at Branch Campo Rico, which is beige with a light brown surface, is obstructed by numerous brochures and bank circulars. Due to this accumulation of materials, Mr. Figueroa has even less space to place documents or conduct transactions. Additionally, his limited mobility makes it difficult for him to move the brochures to clear the surface, further

complicating and restricting his ability to complete his banking tasks independently. This ongoing difficulty discourages him from going to the branch.

70.4. The barriers at Branch Campo Rico could be eliminated by modifying the bank host counter to comply with ADA accessibility standards. This includes lowering the beige counter with a light brown surface to a height that allows individuals using wheelchairs to comfortably interact with staff, hand over documents, receive information, and complete transactions independently. Additionally, increasing the depth of the counter enable Mr. David Figueroa to position himself properly in front of it, allowing him to sign documents, provide identification, and receive materials without unnecessary physical strain. Finally, ensuring that the counter remains clear of brochures and circulars provides an unobstructed surface for transactions, making it easier for individuals with limited mobility to access services efficiently. Implementing these modifications promotes a more inclusive and accessible environment for all customers.

71. Mr. David Figueroa frequently spends time at Plaza Escorial Shopping Mall, a place he appreciates for its variety of establishments and the presence of Caribbean Cinemas, where he enjoys watching movies with friends and family. Within this shopping center, the Banco Popular de Puerto Rico branch at Parque Escorial is a convenient location for him to manage his banking needs. Since January 2025, he has been aware of several architectural barriers at the branch that make access difficult. Due to his physical condition, which requires him to use a wheelchair to get around, he knows he faces obstacles that create inequality in accessing the bank's services, he feels discouraged

from going to the branch. Mr. David Figueroa is aware of the following architectural barriers at the Banco Popular de Puerto Rico – Parque Escorial branch:

- 71.1. Transaction And Customer Service Counters That Are Too Tall: Mr. David Figueroa is aware that the transaction and customer service counters at the Banco Popular de Puerto Rico branch in Parque Escorial, which are white with a light gray surface, are too high for a person in a wheelchair to use effectively. His quadriplegia prevents him from lifting his arms to a sufficient height to hand over documents, receive cash, or comfortably communicate with staff. As a result, he must depend entirely on others for assistance, which limits his independence and makes him feel excluded from the process. This ongoing difficulty discourages him from going to the branch.
- 71.2. Transaction And Customer Service Counters Without Depth For A Frontal Approach: Mr. David Figueroa is aware that the transaction and customer service counters at the Banco Popular de Puerto Rico branch in Parque Escorial, which are white with a light gray surface, do not provide enough depth to accommodate a frontal approach with a wheelchair. The insufficient space makes it difficult for him to position himself properly, limiting his ability to sign documents, present identification, and receive materials with ease. His restricted mobility further prevents him from leaning forward comfortably, making each transaction physically demanding and frustrating. As a result, he feels discouraged from going to the branch.
- 71.3. The barriers at Branch Parque Escorial could be eliminated by modifying the white transaction and customer service counters with a light gray surface to meet

ADA accessibility standards. This includes lowering the counters to a height that allows individuals using wheelchairs to easily interact with staff, hand over documents, receive cash, and complete transactions without assistance. Additionally, increasing the depth of the counters allows Mr. David Figueroa to properly align himself in front of them, enabling him to sign documents, provide identification, and receive materials without excessive physical strain. These modifications eliminate the need for third-party assistance, ensuring that individuals with mobility impairments, like Mr. Figueroa, can access services independently and comfortably, fostering a more inclusive and accessible environment.

72. Living in Carolina, Mr. David Figueroa relies on access to different Banco Popular de Puerto Rico branches in the area to manage his banking needs. The Isla Verde branch is particularly convenient for him, as it is located near several businesses he frequently visits and enjoys for their great atmosphere and excellent seasoning, such as Morena Bistro Bar and Burger King, where he appreciates the classic American hamburger. Since October 2024, he has been aware of several architectural barriers at this branch that make access difficult. Due to his physical condition, which requires him to use a wheelchair to move around, he knows he faces obstacles that create inequality in accessing the bank's services compared to individuals without disabilities. As a result, he feels discouraged from going to the branch. Mr. David Figueroa is aware of the following architectural barriers at the Banco Popular de Puerto Rico – Isla Verde branch:

- 72.1. Transaction And Customer Service Counters That Are Too Tall: Mr. David Figueroa is aware that the transaction and customer service counters at Branch

Isla Verde, which are composed of a dark gray smooth panel and have a cylindrical wooden bar fixed to the counter slightly above the middle of its height, are too tall for a person in a wheelchair to use effectively. Due to his condition of quadriplegia, Mr. Figueroa cannot raise his arms high enough to hand over documents, receive cash, or interact comfortably with staff. This barrier forces him to rely entirely on third-party assistance to complete his transactions, limiting his independence and making access to the establishment's services more difficult. "This situation makes him feel discouraged from going to the branch

- 72.2. Cylindrical Bar On The Front Of The Counter: Mr. David Figueroa is aware that the transaction and customer service counter at Branch Isla Verde, which is composed of a dark gray smooth panel, has a cylindrical wooden bar fixed to the front of the counter slightly above the middle of its height. This bar represents an additional barrier, as beyond the counter being too tall, the cylinder further complicates matters by preventing him from fully approaching the counter with his wheelchair without feeling uncomfortable. Additionally, this structure partially blocks his visibility of the establishment's staff, making communication and interaction with them more difficult. This obstruction prevents him from properly positioning himself in front of the counter, making it difficult to sign documents, hand over his identification, or receive items without additional effort. As a result, each transaction becomes uncomfortable and requires extra maneuvers, affecting his ability to access the establishment's services. Because of this, he feels discouraged from visiting the branch.

72.3. Transaction And Customer Service Counters Without Depth For A Frontal Approach: Mr. David Figueroa is aware that the transaction and customer service counters at Branch Isla Verde, which are composed of a dark gray smooth panel and have a cylindrical wooden bar fixed slightly above the middle of the counter, do not have the necessary depth to allow a frontal approach with his wheelchair. This lack of space prevents him from properly aligning himself with the counter, making it difficult to sign documents, hand over his identification, or receive items comfortably. His limited mobility prevents him from leaning forward without significant effort, turning every transaction into an uncomfortable and physically exhausting process. For these reasons, he feels deterred from going to the branch.

72.4. The barriers at Branch Isla Verde could be eliminated by modifying the transaction and customer service counters to comply with ADA accessibility standards. This includes lowering the dark gray smooth panel counter to an appropriate height that allows individuals using wheelchairs to comfortably interact with staff, hand over documents, receive cash, and complete transactions independently. Additionally, removing or repositioning the cylindrical wooden bar fixed slightly above the middle of the counter eliminates an unnecessary obstruction, allowing Mr. David Figueroa to approach the counter without discomfort and ensuring clear visibility of the staff for better communication. Furthermore, increasing the depth of the counter enables him to position himself properly in front of it, making it easier to sign documents, hand over identification, and receive items without unnecessary physical strain.

Implementing these modifications create a more inclusive and accessible environment, ensuring that individuals with mobility impairments, like Mr. Figueroa, can access services comfortably and independently.

Banco Popular's Cayey Branch

73. Carlos Molina is a client of Banco Popular due to its prestige, solidity, and recognition as one of the most reliable banking entities in Puerto Rico. He loves to travel, which is why he is interested in visiting Cayey because he enjoys traveling to mountainous areas with cool weather and misty mornings, making Cayey an appealing destination for him.
74. Additionally, he needs to use the bank's services to manage his accounts and complete important transactions, and he is interested in visiting the Branch Cayey Montellano since he knows it offers excellent customer service. The advisors and tellers are cordial, and transactions and errands are handled efficiently. Furthermore, he knows that the branch is conveniently located, just two minutes away by car, 550 meters from Wendy's restaurant, and three minutes away by car, 850 meters from KFC, making it very convenient for him to enjoy a meal after completing his banking errands. However, he feels discouraged from visiting because, since December 2024, he has known that the branch has architectural barriers that prevent him from accessing it easily and using the bank's services comfortably. The barriers he is aware of are the following:
 - 74.1. Tall counters: Mr. Carlos knows that the excessive height of the counters makes it difficult for him to interact with advisors. Since he uses a wheelchair, he cannot reach the counter surface comfortably, which prevents him from handling documents, making payments, or signing paperwork independently. The lack of an accessible counter forces Mr. Molina to stretch uncomfortably or depend on

bank employees or companions for simple tasks, undermining his autonomy and making transactions unnecessarily challenging. Additionally, the high counter obstructs his line of sight, making communication with staff more difficult and less personal. These barriers turn a routine banking experience into a frustrating and exclusionary one. Due to this, he feels discouraged from visiting the branch.

74.2. Narrow-depth counters: Mr. Molina acknowledges that the lack of depth in the counters prevents him from approaching them properly. Because he uses a wheelchair, he needs enough space for his knees and feet to position himself comfortably and get close enough to interact with bank staff. However, the shallow design of the counter forces him to stay at a distance, making it difficult for him to reach payment terminals, hand over documents, or complete transactions independently. Since he cannot position himself properly, he is forced to stretch uncomfortably or rely on others for assistance, which limits his ability to manage his banking needs on his own. Additionally, the restricted maneuvering space makes it harder for him to align himself with the service area, creating an inconvenient and frustrating experience. Due to this barrier, he feels discouraged from visiting the branch.

74.3. The barriers on Branch Cayey Montellano could be eliminated by adjusting counter heights to a maximum of 36 inches from the floor, allowing for comfortable access and direct interaction. Counters should also include sufficient knee and foot space to ensure proper positioning and ease of use. Increasing the depth of counters can help individuals get closer, facilitating document exchange and payment processing without unnecessary strain. These modifications should

be implemented consistently to provide a more functional and efficient environment.

75. Mr. Carlos Molina is also interested in visiting Branch Walmart Cayey. Its location near a Walmart makes it convenient for him to purchase items during his visit to Cayey. Additionally, he knows that the branch offers excellent customer service, with cashiers and advisors who are friendly and efficient. However, he feels discouraged from visiting because, since December 2024, he has known that the branch has architectural barriers that prevent him from accessing it easily and using the bank's services comfortably. The barriers he is aware of are the following:

- 75.1. Excessively High Counters: Mr. Carlos Molina is aware that the counters at the branch are excessively high, making interaction with cashiers difficult. Due to using a wheelchair, he cannot reach surfaces above the standard height of 36 inches, which limits his ability to complete transactions independently. Additionally, the height of the counters makes it difficult for him to see the surface and maintain visual contact with the staff, affecting effective communication and service accessibility. Due to this barrier, he feels discouraged from visiting the branch.
- 75.2. Shallow Counters: Mr. Carlos Molina is aware that the counters at the branch are too shallow, preventing him from comfortably approaching them. As a wheelchair user, he requires adequate space to position himself close enough to use the counter effectively. The lack of depth does not provide enough room for his legs and wheelchair, forcing him to stay at a distance, which complicates handling

documents, using banking devices, and interacting with staff efficiently. As a result, he feels deterred from visiting the branch.

- 75.3. The barriers on Branch Walmart Cayey could be eliminated by reducing the counters to a maximum height of 36 inches from the floor, ensuring accessibility. The counters should also have enough depth to allow comfortable approach and provide adequate space for knees and feet. Additionally, there should be sufficient maneuvering space to facilitate movement and interaction with staff. These modifications improve service accessibility, enable face-to-face communication, and allow independent use of banking services without assistance.

Banco Popular's Ceiba Branch

76. Mrs. Bonnelis Cepeda enjoys traveling to coastal destinations and appreciating the warm, tropical climate. She is particularly interested in visiting Ceiba, a charming town known for its beautiful beaches like Playa Escondida and Playa Medio Mundo, as well as attractions such as the ferry rides to nearby islands like Islas Piñeros. She is also interested in visiting the Branch Ceiba. The convenience of having the Branch Ceiba nearby makes it an ideal location for her banking needs, as it is close to popular places like Broadway Gastro Bar, Plaza Felisa Rincón de Gautier, and the Monumento al Veterano. Also, Mrs. Cepeda values Banco Popular's reliable services, including personalized assistance, and secure financial management, which allow her to handle her transactions efficiently while traveling. However, since November 2024, she feels discouraged to visit the branch due to the presence of architectural barriers that affect her mobility. The barriers she is aware of are the following:

76.1. High Beige Counter: Mrs. Bonnelis Cepeda is conscious that the branch has an excessively high beige counter, which presents significant challenges due to the paralysis in her right arm. The elevated height forces her to raise her only functional arm uncomfortably high, making basic tasks like signing documents, handling cash, or using her card more difficult. Since she cannot use both hands, securely grasping or placing items becomes a struggle, increasing the risk of dropping money, papers, or personal belongings. The lack of a stable surface at an accessible height further adds to the physical strain, as she must hold objects for extended periods without support, making transactions unnecessarily exhausting. These accessibility barriers turn simple banking interactions into frustrating and burdensome experiences, forcing her to rely on others for tasks that should be effortless and independent. For these reasons, she feels discouraged from visiting the Branch Ceiba.

76.2. The barriers on Branch Ceiba could be eliminated by installing a lower, accessible section of the beige counter, with a maximum height of 36 inches, to allow easier reach and manipulation of objects with one hand. This section should provide a stable surface where documents can be signed or handled without the need to stretch or lean. Additionally, the counter design could incorporate a clear, unobstructed view to facilitate direct communication with staff.

Banco Popular's Ciales Branch

77. Mr. Walberto enjoys visiting peaceful destinations like Ciales, a town known for its scenic landscapes, rich history, and tranquil atmosphere. He appreciates places where he can relax and connect with nature, making Ciales an ideal getaway. The Banco Popular

Branch in Ciales is conveniently located, allowing him to access essential banking services such as teller assistance, and personalized customer support while traveling. Additionally, the branch is near the Museo del Café de Puerto Rico, All Ways 99, and a Home Goods Store, which makes it even more convenient for him to complete his errands. However, due to his mobility limitations, he has been aware of the architectural barriers at the branch since October 2024, which prevent him from visiting comfortably. As a result, he feels discouraged from going to the branch. The barriers are the following:

- 77.1. Counters That Are Too High: Mr. Walberto knows that excessively high counters make interaction with cashiers and advisors difficult. Because he uses a wheelchair, he cannot reach surfaces that exceed 36 inches, which prevents him from comfortably using the counter, seeing the employees clearly, and engaging in direct communication. This limitation affects his ability to carry out transactions independently, making the process more challenging and requiring assistance from others. Due to this barrier, he feels discouraged from visiting the branch.
- 77.2. Counters That Are Too Shallow: Mr. Walberto is aware that shallow counters prevent him from comfortably approaching them. Because he uses a wheelchair, these counters do not provide enough space for his legs and wheelchair to fit properly, forcing him to position himself at an awkward distance. This affects his ability to interact efficiently with cashiers and advisors, as he struggles to reach the counter space and complete transactions comfortably without external assistance. As a result of this barrier, he is dissuaded from visiting the branch.

77.3. The barriers on Branch Ciales could be eliminated by reducing counter heights to a maximum of 36 inches to ensure accessibility and visibility. Counters should also include a designated lower section to allow for direct interaction. Additionally, counters must provide sufficient depth to accommodate the wheelchair, ensuring adequate knee and foot clearance. These modifications should allow for a comfortable approach, unobstructed use, and independent transactions without requiring assistance.

Banco Popular's Cidra Branch

78. Mr. Molina, a resident of Cidra, relies on the services of Banco Popular, considering it a reputable institution with a strong presence in the financial sector and a commitment to providing reliable banking solutions. For him, Banco Popular stands out for its innovation, customer service, and diverse range of financial products tailored to different needs. Its extensive network of branches and ATMs further enhances convenience, ensuring accessible banking experiences throughout Puerto Rico. Since November 2024, however, he has been aware of architectural barriers at the Cidra branch that make him hesitant to visit, discouraging him from going. Due to his health conditions and reliance on a wheelchair, these obstacles present challenges that limit his mobility and create an unequal experience compared to individuals without disabilities. Mr. Molina is aware of the following architectural barriers at Branch Cidra:

78.1. Tall Transaction and Customer Service Counters: Mr. Carlos Molina is aware that the transaction and customer service counters at Branch Cidra are too tall for a person in a wheelchair to use effectively. Due to his condition of muscular dystrophy, Mr. Molina is unable to stand to reach the counter, preventing him

from properly interacting with the establishment's staff. This barrier makes it difficult for him to conduct transactions, receive assistance, and communicate independently with employees, limiting his access to essential services. This situation discourages him from visiting the branch, as he anticipates challenges in completing basic banking tasks without unnecessary difficulties.

78.2. Transaction and Customer Service Counters Without Depth: Mr. Carlos Molina is aware that the transaction and customer service counters at Branch Cidra lack sufficient depth to allow him to approach them with his wheelchair. As a result, his mobility is restricted, as he cannot position himself comfortably in front of the counter to sign documents, receive items, or complete payments. This barrier forces him to stretch uncomfortably, creating an additional challenge given his muscular dystrophy and limited mobility control. The inconvenience and physical strain involved in accessing these counters discourage him from visiting the branch, as he fears facing discomfort and an inability to carry out transactions independently.

78.3. The barriers at Branch Cidra could be eliminated by modifying the transaction and customer service counters to meet ADA accessibility standards. This could include lowering the counters to an appropriate height that allows individuals using wheelchairs to interact with staff comfortably. Additionally, increasing the depth of the counters enables Mr. Carlos Molina to position himself properly and access necessary services without physical strain. Implementing these modifications ensures that individuals with mobility impairments, like Mr.

Molina, can conduct transactions, receive assistance, and communicate independently, fostering a more inclusive and accessible environment.

Banco Popular's Coamo Branch

79. Mr. Uriel enjoys traveling to experience new places and enjoy different surroundings. He wants to visit Coamo to explore its thermal waters, rich history, unique architecture, and natural attractions. He is particularly interested in visiting places like the Ramón Rivera Bermúdez Historical Museum, where he can learn more about the town's past, the Puente Las Flores, known for its scenic beauty, and the San Blas de Illescas Church, a historic landmark that reflects Coamo's cultural heritage. These destinations capture his interest, making Coamo an appealing place for him to visit and explore. He wants to use the Branch Coamo location due to its convenient placement within the town, allowing him to handle his banking needs without disrupting his visits. Additionally, the branch is conveniently located near Cine Teatro Hollywood, Coamo Historical Museum, Fajita's Mexican Restaurant, a place he enjoys because of his love for Mexican food, and Plaza Luis Muñoz Rivera. However, since October 2024, he has been aware of the architectural barriers at the branch and feels discouraged from visiting due to the impact these barriers have on his comfort and mobility. The barriers he is aware of are the following:

79.1. Inaccessible counter height: Mr. Uriel realizes that the high counter creates significant difficulties for him. Because he uses a walker for mobility and has chronic osteoarthritis in his spine and sacroiliac joints, he cannot comfortably reach or use the surface. The excessive height forces him to extend his arms and tilt his upper body forward, which increases strain on his lower back and neck, causing significant discomfort and making it harder for him to maintain balance.

This position also puts additional pressure on his arms and wrists as he tries to support himself, worsening his joint pain and leading to fatigue. The difficulty of reaching the counter and the physical strain involved in each transaction make the process slow, exhausting, and frustrating for him. Due to these challenges, he feels discouraged from visiting the branch.

79.2. Lack of Clear Floor Space: Mr. Uriel knows that the counter area does not provide enough clear floor space, making it difficult for him to position himself properly while using his walker. The limited space forces him to maneuver in an uncomfortable and unstable way, increasing the strain on his lower back and sacroiliac joints. Due to his chronic osteoarthritis and lumbar disc damage, the awkward positioning causes him significant pain and fatigue, making transactions more difficult. Additionally, the restricted space does not allow him to keep his walker securely in place, which affects his stability and forces him to put additional pressure on his arms and wrists. These obstacles make the visit to the branch a physically demanding and frustrating experience, discouraging him from visiting the branch.

79.3. The barriers on Branch Coamo could be eliminated by adjusting the counter's height to a more accessible level, ensuring that transactions can be conducted without unnecessary strain. Additionally, the area in front of the counter must have enough clear space to allow proper maneuvering without obstruction. Any fixtures or design elements that restrict movement should be repositioned or removed to create an open and accessible environment. These changes should be implemented with practical and durable materials to maintain functionality while

improving accessibility. Eliminating these barriers makes it possible for Mr. Uriel to visit the branch and take full advantage of its services.

Banco Popular's Comerio Branch

80. Mr. Walberto Hernández, a valued client of Banco Popular, has placed his trust in the institution due to the reliable management of his accounts, the wide range of financial services offered, and the personalized attention that continually encourages him to use its services. Using a wheelchair—owing to spina bifida and congenital hydrocephalus, conditions that prevent him from walking—he personally visited the Comercio Branch on June 21, 2024. During his visit, he directly observed several accessibility shortcomings despite the appealing surroundings and the elegant blue counter with a white stripe that characterizes the establishment. His firsthand experience was marked by physical barriers that, given his limited mobility, hindered his ability to interact independently and safely with the staff, thereby reducing the efficiency of his banking transactions.

80.1. Counters Lacking an Adapted Section Below 36 Inches: Mr. Hernández personally identified that, despite the sophisticated appearance of the blue counter with a white stripe, it lacked an adapted section below 36 inches. During his visit, he had to strain in order to reach the surface intended for signing documents and conducting transactions—a task that proved particularly challenging given his limited vertical range as a wheelchair user. This barrier caused him immediate fatigue and discomfort, significantly impeding his direct interaction with the bank's representatives.

80.2. Counter Surface Lacking an Accessible Lower Extension: Mr. Hernández observed that the entire counter did not feature an accessible lower extension that

facilitated access for wheelchair users. While attempting to place his documents and personal items, he was forced to rely solely on the elevated portion of the counter, which made it difficult for him to organize his belongings securely and comfortably. The absence of this adapted area negatively affected his ability to complete transactions efficiently, clearly highlighting a design limitation.

80.3. Excessive Height and Lack of Depth in the Initial Access Counter: Mr. Hernández is aware that the initial access counter—characterized by a grey finish with a wooden stripe—is excessively high and completely lacks depth. This design flaw prevents him from comfortably aligning his wheelchair with the service surface, compelling him to strain significantly in order to reach it. The resulting additional effort not only increases his fatigue but also directly impacts his health, further discouraging him from using the branch.

80.4. Insufficient Depth Under the Service Counter for Comfortable Positioning: Furthermore, Mr. Hernández has observed that the service counter does not offer adequate recessed space underneath for him to position his wheelchair securely. Without a lower, accessible zone beneath the counter, he is forced to adjust his posture unnaturally while attempting to deposit documents and personal items. This deficiency intensifies his immediate discomfort and physical strain, given his pre-existing conditions.

80.5. To rectify these accessibility shortcomings, an integrated approach is recommended. First, the counter should be modified by incorporating an accessible segment that does not exceed 36 inches in height and extends uniformly across its full depth, enabling Mr. Hernández to reach the service area

for signing documents and depositing his belongings without undue strain. Additionally, the initial access counter (grey with a wooden stripe) must be redesigned to reduce its height and incorporate sufficient depth, ensuring a comfortable alignment for wheelchair users. Furthermore, the service counter should be retrofitted to provide an accessible, recessed area underneath, allowing users to position themselves securely. Once these enhancements are implemented, Mr. Hernández conducts his banking transactions safely, comfortably, and independently, in full compliance with ADA guidelines.

Banco Popular's Corozal Branch

81. Mr. Walberto has a strong interest in visiting Corozal, a town known for its diverse family and group activities, from outdoor recreation in vast natural and rural spaces to breathtaking landscapes that provide the perfect setting for relaxation. One of its greatest highlights is its delicious gastronomy, offering a variety of local flavors. One of the main reasons Mr. Walberto is interested in visiting the place is to try its food and enjoy the unique culinary experience it offers. The Branch Corozal is conveniently located for him, as it is close to Burger King, a place he is a big fan of for its hamburgers, as well as other food spots like Subway, Church's Texas Chicken, Rich Kitchen, and Walgreens grocery store. This proximity allows him to easily handle his banking needs while enjoying the town's offerings. However, since October 2024, Mr. Walberto has been aware of the architectural barriers at the branch, which make it difficult for him to access its services. These obstacles discourage him from visiting, as they create unnecessary challenges that affect his ability to carry out transactions independently. The barriers he is aware of are the following:

- 81.1. Counters That Are Too High: Mr. Walberto has knowledge that excessively high counters make interaction with staff difficult. Because he uses a wheelchair, he cannot reach high surfaces, which prevents him from clearly seeing employees and makes direct communication challenging. The excessive height forces him to tilt his head and neck upward for prolonged periods, which can cause discomfort. Additionally, his limited vertical range of motion makes it difficult for him to extend his arms high enough to place or retrieve items from the counter, forcing him to rely on others for basic transactions. This lack of accessibility slows down interactions and makes independent use of the counter impractical. This issue discourages him from going to the branch.
- 81.2. Counters That Are Too Shallow: Mr. Walberto recognizes that shallow counters make it difficult for him to approach them comfortably. Since he uses a wheelchair, these counters do not provide enough space for his knees and feet to fit underneath, forcing him to remain at a distance that limits his access to the service area. This positioning makes it harder for him to sign documents, handle payments, or receive items from cashiers without overextending his arms, which can cause strain. Additionally, being unable to position himself close enough to the counter affects his stability, as he must lean forward while maintaining control of his wheelchair. These limitations make interactions uncomfortable, inefficient, and more physically demanding than necessary. As a result of this barrier, he is dissuaded from visiting the branch.
- 81.3. The barriers on Branch Corozal could be eliminated by lowering counters to a maximum height of 36 inches to allow for better accessibility and direct

interaction. Counters should also include a designated lower section with enough space to accommodate mobility aids comfortably. Additionally, increasing counter depth can provide sufficient knee and foot clearance, allowing for a closer approach and reducing the need to reach or lean forward. These modifications should ensure ease of use, improve efficiency in transactions, and allow for independent access without requiring external assistance.

Banco Popular's Dorado Branch

82. **Mr. Walberto Hernández** is a customer of Banco Popular with a particular interest in visiting Dorado, as he knows it has beautiful beaches and a vibrant artistic atmosphere. He intends to enjoy the area, appreciating its unique blend of relaxation and culture, which makes it an ideal destination for his travels. Mr. Walberto is interested in completing his banking errands at the Branch Plaza Dorada, as it is conveniently located near well-known restaurants such as Pirilo Pizza Rústica, Popeyes Louisiana Kitchen, Garden Sushi, and Wendy's, allowing him to handle his transactions and enjoy a delicious meal while exploring the area. As a reputable bank, Banco Popular offers key services and personalized customer support, ensuring Mr. Hernández can manage his banking needs efficiently. However, since December 2024, he has been aware of the architectural barriers at the branch, which dissuade him from visiting it. He is aware of the following barriers:

82.1. Counter Exceeding 36 Inches in Height: Mr. Walberto Hernández knows that the counter's height, which exceeds 36 inches, prevents him from approaching it comfortably and conducting transactions with ease. Due to the use of a wheelchair, he cannot elevate himself to an adequate level to interact directly with

bank staff. The height of the counter forces him to extend his arms beyond a comfortable range, causing physical strain and making it difficult to hand over documents, sign papers, or retrieve items without significant effort. Because of this obstacle, he feels reluctant to visit the branch.

82.2. Insufficient Counter Depth: Mr. Walberto also recognizes that the counter's insufficient depth prevents him from positioning himself close enough to perform transactions efficiently. The structure of his wheelchair requires adequate space to align properly with the counter, but the shallow depth forces him to remain at a distance, making it difficult to reach the writing surface. This limitation causes difficulty when signing documents, filling out forms, or using the counter for support, as he must stretch his arms uncomfortably, increasing physical strain. The lack of sufficient space between his wheelchair and the counter further restricts his ability to maneuver, complicating the process of handling paperwork and interacting with bank personnel. As a consequence of this barrier, he feels discouraged from going to the branch.

82.3. The barriers at Branch Plaza Dorada could be eliminated by adjusting the counter height to a level that allows for direct and comfortable access, ensuring that reaching the surface does not require unnecessary strain. Lowering the counter to a more accessible height to facilitate smoother transactions. Additionally, increasing the counter's depth is essential to provide enough space for proper positioning, preventing the need to remain at a distance. These modifications should be implemented using durable and functional materials to maintain the counter's usability while improving accessibility. Proper spacing and an

ergonomic design must also be considered to enhance comfort and efficiency during transactions.

Banco Popular's Fajardo Branch

83. Mr. David Figueroa is a long-time customer of Banco Popular who enjoys traveling and has a particular interest in exploring Fajardo. He knows this town is recognized for its breathtaking beaches, ecological reserves, lively marinas, and numerous water activities. The combination of adventure and relaxation makes it an appealing destination for him. The Branch Fajardo is ideally situated near popular attractions, making it a convenient location for him to handle his banking needs while enjoying the area. However, since December 2024, he has become aware of architectural barriers at the branch that create significant challenges and prevent him from comfortably accessing its services. These obstacles complicate his banking experience and discourage him from visiting the branch. He has identified the following barriers:

83.1. High Counter Height: Mr. David Figueroa acknowledges that the excessive height of the counter creates a significant barrier for him. The counter is too high for him to reach comfortably, making basic tasks such as placing or retrieving documents, signing paperwork, or making payments unnecessarily difficult. Since he uses a wheelchair, his seated position prevents him from extending his arms high enough to access the surface properly. This forces him to stretch uncomfortably or rely on assistance for tasks he can otherwise handle independently. The high counter limits his ability to interact smoothly with bank staff, turning what should be a simple transaction into a frustrating and inefficient process. Due to this barrier, he feels discouraged from visiting the branch.

83.2. Lack of Counter Depth: Mr. Figueroa is also affected by the insufficient depth of the counter, which does not provide enough space for him to position himself close enough to compensate for its height. His wheelchair cannot fully approach the counter due to the lack of adequate clearance, forcing him to remain at a distance while attempting to conduct transactions. This positioning makes it harder for him to reach documents, payment terminals, or other essential banking materials, increasing physical strain and making each interaction more challenging. Without the ability to align himself properly, he must adjust his posture in ways that cause discomfort, making banking tasks more demanding than they should be. Because of these difficulties, he feels discouraged from visiting the place.

83.3. The barriers at Branch Fajardo could be eliminated by adjusting the counter height to a maximum of 36 inches, allowing for comfortable and practical use from a seated position. Additionally, the counter should have enough depth to enable direct approach with a wheelchair, ensuring unobstructed access. If modifying the existing counter is not feasible, an accessible section at an appropriate height and depth must be installed to provide a functional alternative. These adjustments should be implemented with durable and stable materials to maintain usability while ensuring compliance with accessibility standards.

Banco Popular's Florida Branch

84. Mr. Walberto wants to visit Florida, a town famously called the "Land of the Enchanted River," recognized for its breathtaking natural landscapes, limestone formations, and its close distance to scenic coastal spots like Playa Dorado, Playa Mar Chiquita, and Playa

Flamenco. Mr. Walberto is interested in enjoying everything Florida has to offer, including access to remarkable parks like the Río Camuy Caves National Park, El Yunque National Forest, and Cambalache Forest. The town's cultural offerings include galleries like Artefino Art Store, which display local artistic talent. Mr. Walberto is a valued customer of Banco Popular and is interested in visiting the Branch Florida for his banking needs. The branch is located near the Plaza Pública de Florida Manuel Frías Morales, Cheung Fung Chinese Restaurant, La Rotonda Sport Bar, and the El Toque de Papi bakery, allowing him to handle his financial transactions with ease while exploring the surroundings. He appreciates the benefits of having access to a reliable bank offering and also values the branch's convenient location. Since November 2024, Mr. Walberto has been aware of the architectural barriers at the branch, which make it difficult for him to fully access the bank's services. These obstacles create unnecessary challenges, making transactions more complicated and discouraging him from visiting the branch. The barriers he is aware of are the following:

- 84.1. Excessive counter height: Mr. Walberto is conscious of the high counter barrier, which significantly affects him when he needs to carry out banking transactions. Since he uses a wheelchair to move around, the height of the counter makes it physically difficult for him to reach over to hand documents or receive information without straining. He often has to ask for assistance from a bank employee or another person nearby to help him pass documents, which can be embarrassing and time-consuming. This barrier not only disrupts his independence but also creates a sense of exclusion. His need to rely on others for

simple interactions adds frustration and makes an otherwise quick process take longer. Because of this inconvenience, he is less inclined to visit the branch.

84.2. Reduced-depth counter: Mr. Walberto also has knowledge of the shallow counter barrier, which affects his ability to approach the counter comfortably while using his wheelchair. Due to the limited depth of the counter, he cannot move close enough to make direct eye contact with bank staff or place documents in front of them without having to stretch forward awkwardly. This creates discomfort as he is forced into an unnatural position, and in some cases, may even lead to his inability to access the necessary counter space to complete transactions properly. The shallow counter also limits his ability to converse easily with staff, as he is too far away to hear or communicate effectively without straining. These issues not only affect the quality of his service but also increase the time spent in the bank, causing unnecessary frustration and stress. This limitation makes him hesitant to go to the branch.

84.3. The barriers at Branch Florida could be addressed by adjusting the height and depth of the counter to make it more accessible, ensuring that it is within reach without unnecessary difficulty. Lowering the counter or incorporating a cutout section to allow for easier access to services without requiring excessive effort. Additionally, expanding the space behind the counter facilitates better movement, and organizing items and tools more efficiently eliminates unnecessary obstacles.

Banco Popular's Guayama Branch

85. Mr. Uriel Sepúlveda is interested in visiting Guayama, a popular tourist destination that captures his attention with its rich history, cultural landmarks, natural beauty, and diverse

outdoor activities. The town offers him a variety of experiences, making it an exciting place for him to explore and enjoy. Given that Banco Popular provides essential banking he sees it as a reliable institution to manage his transactions and accounts. He is especially interested in visiting the Branch Guayama Mall, as it is strategically situated close to Plaza Cristóbal Colón and a highly rated hotel, making it a practical option for handling his banking needs while experiencing the town's offerings. As a trusted financial institution, Banco Popular ensures that customers have access to key services that facilitate efficient financial management. However, since December 2024, he has been aware of the architectural barriers at the branch, which make him feel discouraged from visiting the location.. The barriers he is aware of are the following:

- 85.1. Counter Too High: Mr. Uriel recognizes that the counter is too high, which significantly affects his ability to interact with it. Due to his lumbar disc damage and chronic osteoarthritis in the spine, he experiences persistent pain and limited mobility in his back. Using a walker for support, he is unable to stand fully upright for extended periods or stretch his arms comfortably to reach the top of the counter. This forces him to strain his back and shoulders when attempting to sign documents or retrieve items, which increases his discomfort and frustration. This barrier discourages him from visiting the branch.
- 85.2. Inadequate clear space: Mr. Uriel Sepúlveda realizes that the limited clear floor space near the counter presents a significant barrier for him. Since he uses a walker for mobility, he requires sufficient space to position himself properly while conducting transactions. However, the restricted area forces him to maneuver uncomfortably, making it difficult for him to align himself with the counter

without bumping into obstacles or struggling to stabilize his walker. The lack of adequate space requires him to twist his body or stand at an awkward angle, which places excessive strain on his lower back and sacroiliac joints. Due to his chronic osteoarthritis and lumbar disc damage, these forced postures intensify his pain and fatigue, making it physically challenging to remain standing for extended periods. Additionally, the inability to position his walker securely increases his difficulty in maintaining balance, making each transaction unnecessarily strenuous. The constant discomfort and physical strain caused by this barrier make his banking experience frustrating and inefficient, discouraging him from visiting the branch.

- 85.3. The barriers at Branch Guayama Mall could be eliminated by reducing the counter height to a level that enables easier access without the need for excessive reaching or uncomfortable postures. Additionally, the clear floor space near the counter should be widened to allow unrestricted movement, eliminating the need for awkward positioning or unnecessary physical effort. Any objects or fixtures obstructing the service area should be removed to create a more practical and accessible environment. These adjustments can be made using durable and functional materials that ensure the counter remains fully operational while enhancing accessibility. Removing these barriers allows Mr. Uriel to access the branch and make full use of its services.

Banco Popular's Guayanilla Branch

86. Mr. Uriel has a passion for exploring Puerto Rico and discovering its many incredible destinations, including Guayanilla, a town known for its spectacular hills, abundant

waters, and scenic beaches that serve as popular spots for cruise excursions. Additionally, Guayanilla offers cultural attractions such as the Castillo Serrallés and the Museo de Arte de Ponce, making it an appealing location for both relaxation and learning. During his travels, Mr. Sepúlveda prioritizes having a secure and accessible way to manage his banking needs, which is why he sees Banco Popular as the best choice for his financial affairs. He is particularly interested in visiting the Guayanilla branch while staying in the area, as it is conveniently located near several local businesses, including Farmacia Lerma, Farmacia La Ventana, Faris Fashion Tienda de Ropa, and Artesanías Lula, allowing him to complete his errands while managing his banking tasks. However, since October 2024, Mr. Sepúlveda has had knowledge of the architectural barriers that discourage him from visiting the branch, as they prevent him from comfortably accessing its services. The barriers he is aware of are the following:

- 86.1. Counter at an inaccessible height: Mr. Uriel is aware that the counter is too high, which makes it difficult for him to use it effectively. Due to the osteoarthritis in his spine, he experiences stiffness and reduced flexibility, which prevents him from comfortably raising his arms to reach the surface. Additionally, the height of the counter requires him to extend his back and shoulders beyond his normal range of motion, causing immediate discomfort. As he uses a walker for support, he cannot position himself close enough to the counter to engage with items on it without compromising his balance. This combination of physical limitations and the elevated surface makes simple tasks like writing or handing over objects particularly challenging. Due to this barrier, he feels dissuaded from visiting the branch.

86.2. Reduced open space for accessibility: Mr. Uriel Sepúlveda recognizes that the lack of adequate floor space near the counter is a major obstacle for him. Because he uses a walker, he requires enough room to stand in a stable position and conduct his transactions without unnecessary strain. However, the limited space forces him to contort his body or position his walker at an awkward angle, placing additional pressure on his already weakened lower back and sacroiliac joints. As a result, the effort required to complete a simple banking transaction becomes exhausting and painful. The discomfort and difficulty of navigating the tight space make each visit an unpleasant experience, discouraging him from visiting the branch.

86.3. The barriers at Branch Guayanilla can be eliminated by adjusting the counter height to a level that allows for effortless access without requiring unnecessary strain. Moreover, the clear floor space in front of the counter expands to facilitate unrestricted movement, preventing any unnecessary physical discomfort. Any objects or structural elements that obstruct access are relocated or removed to create a more practical and accessible service area. Implementing these improvements with durable and well-designed materials enhances usability while maintaining the counter's functionality. Eliminating these barriers enables Mr. Uriel to visit the branch and fully benefit from its services.

Banco Popular's Guaynabo Branches

87. Mr. David Figueroa is a loyal client of Banco Popular, drawn to the institution for its efficient account management, broad range of financial products, and excellent customer service. He prefers to handle his financial matters in person, as this allows him to

communicate directly with bank staff, oversee his transactions securely, and resolve any issues immediately. The Plaza Guaynabo branch is particularly convenient for him, as it is located close to his residence, making it a practical and accessible option for conducting his banking activities. Despite his interest in visiting this branch, he feels dissuaded from doing so due to various accessibility barriers that prevent him from navigating the branch safely and independently. Mr. Figueroa has quadriplegia, a condition that severely restricts his mobility and prevents him from standing or sitting without specialized support. As a result, he relies on a wheelchair for mobility. These barriers directly impact him, limiting his ability to access the bank's services on equal terms. The accessibility barriers he faces are as follows:

88. Counter Without an Accessible Lower Zone: Mr. David Figueroa is aware that the service counter at the Plaza Guaynabo branch does not include a section positioned at or below 36 inches in height, which prevents him from comfortably reaching the surface while using his wheelchair. The counter is a sleek gray structure with a modern design, featuring good lighting that enhances visibility for customers. However, despite its aesthetic appeal and functionality for standing clients, it does not accommodate individuals who rely on mobility aids. Without an accessible lower section, he must stretch beyond his physical capacity to reach documents or interact with bank staff, causing immediate discomfort and unnecessary strain. The lack of a properly designed counter hinders his ability to complete his transactions independently and forces him to exert excessive effort for routine banking tasks. As a result, he feels dissuaded from visiting this branch because this barrier makes it difficult for him to receive services in a way that accommodates his needs.

- 88.1. Lack of a Continuous Accessible Lower Extension: Mr. David Figueroa is aware that the counter lacks an accessible surface extension at a lower height, making it impossible for him to place his documents and belongings in a stable and secure position while conducting transactions. Without a functional lower extension, he is forced to rely on the higher portion of the counter, which is beyond his reach, making it difficult to handle his banking paperwork efficiently. Because of his limited mobility, he cannot hold documents for prolonged periods without discomfort, increasing the likelihood of dropping essential items. He feels dissuaded from visiting this branch because the lack of a proper support surface complicates his ability to manage his transactions safely and effectively.
- 88.2. Insufficient Space at the Counter: Mr. David Figueroa is aware that the design of the service area does not provide adequate clearance underneath the counter for his wheelchair to be properly positioned. This deficiency prevents him from repositioning himself comfortably and independently, as the restricted space below the counter forces him to make awkward, confined movements that increase his discomfort and fatigue. Given his condition, where even minor physical strain can exacerbate his challenges, the lack of a low-level, accessible space makes simple banking activities unnecessarily difficult. Consequently, he feels dissuaded from visiting this branch because the inadequate space beneath the counter hinders his ability to navigate the facility safely and autonomously.
- 88.3. The accessibility barriers at Banco Popular's Plaza Guaynabo branch can be addressed through structural modifications that ensure equitable access to banking services for all clients, including those with disabilities. The service counter must

be redesigned to include an accessible section no higher than 36 inches, allowing Mr. David Figueroa to interact with staff and complete his transactions without unnecessary physical strain. Additionally, a functional lower extension must be incorporated, ensuring that he can place his documents and belongings securely while handling his banking needs. Furthermore, it is recommended to redesign the counter by incorporating a recessed, accessible area underneath, ensuring ample clearance for wheelchair positioning. This modification should provide sufficient depth so that users like Mr. Figueroa can comfortably and securely align their wheelchairs without overextending, thereby reducing discomfort and strain. These adjustments, made in strict adherence to ADA guidelines, enable Mr. Figueroa to navigate the facility safely and independently, making his banking transactions smoother and less physically demanding.

89. Mr. David Figueroa is eager to make regular visits to the Branch San Patricio Gallery, as it offers great convenience for him. As a passionate movie lover, he knows that Caribbean Cinemas San Patricio provides an exceptional experience. He envisions combining his banking errands with his love for cinema, making the most of his time by managing his finances while enjoying a movie, ultimately making his day more productive and enjoyable. However, since November 2024, he has been hesitant to visit this branch. His reluctance stems from his awareness of certain architectural barriers at the location that could make it difficult for him to access the services comfortably, leaving him feeling excluded and discouraged from going.

- 89.1. Challenge of Counter Accessibility: The height of the counter at the Branch San Patricio Gallery presents a significant challenge for Mr. David Figueroa, as it is

too elevated for him to access comfortably while seated in his wheelchair. Being quadriplegic, he is unable to reach the counter without difficulty, forcing him to rely on others for help when handling his banking tasks. This reliance diminishes his sense of independence, making his banking experience inefficient and frustrating. The elevated counter height not only causes physical discomfort but also discourages him from visiting, as the process of attempting to access the counter becomes complicated and unpleasant.

89.2. Insufficient Counter Depth: Mr. David Figueroa also feels discouraged from visiting the branch because he is aware that the counter at the Branch San Patricio Gallery lacks the necessary depth for him to approach it properly in his wheelchair. This lack of space obstructs his ability to position himself comfortably in front of the counter. The absence of an appropriately designed counter for his mobility needs negatively affects the quality of service he receives. As a result, he is forced to adopt uncomfortable postures, which cause physical strain and disrupt his banking experience, leading to unnecessary delays and frustration.

89.3. To resolve the barriers faced by Mr. David Figueroa, a solution involves modifying the counter at the Branch San Patricio Gallery to meet the requirements outlined in the Americans with Disabilities Act (ADA) of 2010. The counter should be lowered to an appropriate height, allowing Mr. Figueroa to easily reach and interact with it without difficulty while seated in his wheelchair. This adjustment enables Mr. Figueroa to independently access banking services without needing assistance from others, restoring his autonomy and improving the

efficiency of his tasks. Furthermore, the counter should be designed with greater depth, providing ample space for his wheelchair to approach the counter directly, eliminating the discomfort he currently experiences when trying to position himself. By making these necessary changes, the branch aligns with ADA standards, and Mr. Figueroa feels comfortable visiting the Branch San Patricio Gallery, carrying out his banking tasks without limitations.

90. Mr. David Figueroa became interested in the Banco Popular branch at San Patricio Mall because of its proximity to his favorite restaurant, Julietta Trattoria, which he believes offers the best Italian cuisine in Puerto Rico. This convenient location allows him to easily manage his banking tasks while enjoying a delicious meal, making the most of his time without having to travel far. Despite the appeal of this combination, David has refrained from visiting the branch since November 2024, as he is aware of certain architectural barriers that make accessing the branch difficult for him:

- 90.1. High Counter Design: Mr. David Figueroa has noticed that the counter at the Branch San Patricio Mall is positioned too high, making it difficult for him to reach it comfortably. Due to his quadriplegia, he struggles to get close enough to the counter, which prevents him from conducting his banking independently. This inconvenience forces him to rely on others for help, causing discomfort and frustration, ultimately deterring him from visiting the branch.
- 90.2. Lack of Space for Easy Access: David knows that the layout of the counter at the Branch San Patricio Mall further complicates Mr. Figueroa's experience, as it does not allow him to approach it directly in his wheelchair. The insufficient depth of the counter creates an obstacle that makes it hard for him to position

himself in front of it without discomfort. This spatial limitation increases his frustration, making banking tasks more difficult and discouraging him from using the branch altogether.

90.3. An effective solution for the barriers present at the branch is to modify the counter at the Branch San Patricio Mall to make it accessible. This involves lowering the counter height and increasing its depth, allowing Mr. David Figueroa to approach directly in his wheelchair without obstacles, enabling him to carry out his banking tasks independently, which is essential for his autonomy. Mr. Figueroa knows that if these barriers are resolved, he can visit the Branch San Patricio Mall without restrictions and without feeling excluded.

91. Mr. David Figueroa is a client of Banco Popular, and although he resides in San Juan, he is aware of the proximity between his city and Guaynabo, with both cities being just a few minutes apart by car. He also knows that Garden Hills is an ideal place to stay. Therefore, Mr. David wants to visit the Branch Expreso Garden Hills, which is strategically located in Garden Hills, allowing him to handle banking tasks such as withdrawing money and other errands in the area. Nevertheless, since December 2024, Mr. David has refrained from visiting the Branch Expreso Garden Hills because he is aware of the following architectural barriers that hinder his access to the branch:

91.1. Customer Service Counter Accessibility Issue: Mr. David Figueroa is well aware that the counter at the Expreso Garden Hills Branch is positioned too high for him to use comfortably while seated in his wheelchair. His mobility limitations make it difficult for him to reach the counter's surface, making it impossible for him to perform his banking tasks without assistance. This creates a sense of dependence,

reducing his autonomy and leading to physical discomfort, which in turn makes him reluctant to visit the branch. The added difficulty of needing help for basic tasks makes the process feel more like a burden than a service.

91.2. Challenges in Approaching the Counter: Mr. David also notices that the layout of the Expreso Garden Hills branch doesn't allow him to approach the counter easily. The lack of adequate space in front of it prevents him from positioning his wheelchair properly, causing him to maneuver uncomfortably. This forces him into awkward positions that not only make his interaction with the staff inefficient but also increase his discomfort, making him feel hindered during what should be a simple task. Consequently, this spatial constraint discourages him from returning to the branch.

91.3. To address the challenges Mr. David Figueroa faces with the counter height, it is crucial to make the necessary modifications to ensure he can access it independently while seated in his wheelchair. The counter should be lowered to a more appropriate height that accommodates individuals with mobility devices, following the accessibility guidelines outlined by the ADA. Additionally, incorporating an adjustable section or a designated accessible space within the counter allows Mr. David to approach it without obstruction, improving his ability to manage his banking tasks independently. Furthermore, the lack of sufficient space in front of the counter should be corrected through design adjustments. Expanding the area's depth creates enough room for Mr. David to maneuver his wheelchair comfortably, making the experience of accessing services much more straightforward. Once these structural changes are implemented and the physical

barriers are eliminated, Mr. David visits the Expreso Garden Hills branch with ease, regaining his independence and no longer needing assistance from others.

92. Mr. David Figueroa wants to visit the Branch Valencia Park, as although he does not reside in Guaynabo, there is a restaurant called La Hacienda | City View Plaza, famous for its cheesecake with a smooth texture and exceptional flavor. As a Banco Popular customer, it is very convenient for him to have a branch nearby to carry out his banking transactions, such as withdrawing money, making payments, checking his balance, and other essential banking services. However, since November 2024, Mr. David Figueroa has refrained from visiting the Branch Valencia Park due to his awareness of the following architectural barriers present at the location:

- 92.1. Counter Accessibility: Mr. David Figueroa knows that the counter at the Branch Valencia Park is too high for him, creating a clear barrier. As a person with quadriplegia, his limited mobility prevents him from reaching the counter comfortably. This height difference makes it difficult for him to perform tasks such as withdrawing money or checking his account balance without help. The necessity of relying on others for these basic tasks compromises his sense of independence and makes the banking experience uncomfortable and inefficient. Because of this, he has avoided visiting the branch, as the lack of accessibility significantly hinders his ability to complete his errands with ease.
- 92.2. Limited Space for Mobility: Mr. David Figueroa also faces challenges with the insufficient depth of the counter at the Branch Valencia Park. The lack of space prevents him from positioning himself properly in front of the counter, forcing him into awkward positions. This spatial restriction not only causes physical

discomfort but also makes him feel excluded and frustrated. The design of the counter does not accommodate his needs, creating additional difficulties as he struggles to maneuver and access services efficiently. This lack of space further discourages him from visiting the branch, as the experience becomes more taxing than it should be.

92.3. To address the barriers faced by Mr. David Figueroa at the Valencia Park Branch, it is essential to make modifications that allow for more suitable and independent access. The counter must be modified to meet ADA accessibility standards, which includes lowering its height to be reachable from a wheelchair. Additionally, there should be an accessible section or an adjustable counter for comfortable access. Furthermore, the space in front of the counter must be expanded to allow Mr. David to approach it directly with his wheelchair without difficulty. This structural adjustment is necessary to ensure smooth, comfortable, and efficient access. Mr. David is confident that once these architectural barriers are addressed, he will be able to visit the Valencia Park Branch comfortably, making efficient use of his time and enjoying his visit without obstacles.

93. Mr. David Figueroa intends to visit the Branch Guaynabo Las Cumbres of Banco Popular because he knows about Metropol, a restaurant famous for its delicious Cuban food and unique atmosphere, which makes each visit a pleasant and memorable experience. Having a branch close to the restaurant is very convenient for him, as it allows him to complete banking tasks efficiently and enhances his experience at the restaurant. Furthermore, since December 2024, Mr. David Figueroa has been discouraged from

visiting the Branch Guaynabo Las Cumbres because he is aware of the architectural barriers present at the location. The barriers are as follows:

- 93.1. Unreachable Counter Height: Mr. David Figueroa is aware that the counter at the Guaynabo Las Cumbres Branch is positioned too high for him, and due to his quadriplegia, he faces challenges moving his arms and hands with the necessary flexibility to reach such a height. Additionally, his reliance on a wheelchair prevents him from getting close enough to the counter, further complicating access to services. This issue limits his independence, leading him to avoid visiting the branch to prevent uncomfortable and impractical experiences.
- 93.2. Limited Space to Approach the Counter: Another challenge Mr. David Figueroa is aware of is insufficient space in front of the counter at the Guaynabo Las Cumbres Branch. Due to his reliance on a wheelchair, he cannot approach the counter comfortably. The lack of space prevents him from interacting directly and efficiently with the staff, forcing him to waste valuable time adjusting his position to complete tasks. This makes even simple banking tasks more complicated, discouraging him from visiting the branch.
- 93.3. To address the barriers that Mr. David Figueroa faces at the Branch Guaynabo Las Cumbres, it is essential to make structural and design modifications that ensure he has adequate and independent access. First, the counter must be lowered to a level that is reachable from a wheelchair. Furthermore, it is necessary to include an accessible section at the counter or install an adjustable counter to allow Mr. David to approach comfortably. Regarding space, the area in front of the counter should be expanded to provide enough room for Mr. David to approach directly

with his wheelchair without difficulty. These structural changes are crucial to ensure that Mr. David can carry out his banking tasks independently and efficiently, without having to rely on others. Mr. David is confident that once these architectural barriers are resolved, he can visit the Branch Guaynabo Las Cumbres comfortably and complete his transactions quickly and independently.

Banco Popular's Gurabo Branch

94. Mr. David Figueroa enjoys traveling, especially to peaceful destinations where he can relax and experience local culture. He has a particular interest in visiting Gurabo, a town in Puerto Rico known for its rich history and tranquil atmosphere, making it an ideal destination for him as he seeks a peaceful escape from the hustle and bustle. Among its attractions are charming churches and cathedrals, such as the Parroquia San José de Gurabo, which reflect the town's cultural heritage. These attractions are conveniently located near the Banco Popular Branch Gurabo, making it a practical stop during his visit. As a long-time customer of Banco Popular, Mr. Figueroa values the convenience of accessing the essential services while traveling. He particularly appreciates the branch's location, as it is close to several convenient businesses, including Papaña a la Mexicana, a restaurant that aligns with his fondness for Mexican cuisine, as well as a Walgreens and other grocery stores where he can easily purchase items for his trip. For Mr. Figueroa, being able to handle his banking tasks efficiently and calmly while traveling is essential. However, since October 2024, he has become aware of the architectural barriers present at the branch, which make it difficult for him to access the services he needs. These obstacles create unnecessary challenges, making his visits inconvenient and physically

demanding, which discourages him from visiting the branch. The barriers he is aware of are the following:

- 94.1. Excessive Counter Height: Mr. David Figueroa is aware of the barrier caused by the counter's excessive height, which exceeds 36 inches. This elevated surface significantly limits his ability to interact with it while seated in his wheelchair. Due to his restricted upper body mobility, he cannot comfortably extend his arms to reach the counter's surface. This makes tasks such as handing over documents, signing paperwork, or processing payments particularly challenging. The high counter forces him to stretch beyond his physical capacity, causing discomfort and preventing him from completing these actions independently, thus complicating his interaction with the space. As a result of this barrier, he is discouraged from visiting the branch.
- 94.2. Insufficient Counter Depth: Mr. David Figueroa is also conscious of the barrier created by the counter's shallow depth. The limited surface area does not allow him to position his wheelchair close enough to the counter. As a result, he must reach forward awkwardly, which is physically demanding given his restricted upper body movement. The shallow depth makes it difficult for him to securely place or retrieve items, perform tasks like writing or signing, and engage with individuals across the counter. This inadequate depth, combined with his seated position, hinders his ability to interact with the counter effectively and without assistance. Due to this barrier, he feels dissuaded from visiting the branch.
- 94.3. The barriers at Branch Gurabo could be eliminated by adjusting the counter to a height of 36 inches or less, ensuring it is easily reachable from a seated position.

The surface should be modified or replaced with one that allows for practical interaction without the need for excessive arm extension. Additionally, the counter depth should be increased to provide sufficient space for a wheelchair to approach without obstruction. This can be achieved by extending the countertop or installing a new section with appropriate dimensions. Materials should be selected to guarantee stability and durability, and the modifications must maintain functionality while facilitating effortless access and use.

Banco Popular's Hatillo Branch

95. Mr. Walberto Hernández loves traveling and exploring the diverse landscapes of Puerto Rico, with a particular interest in visiting Hatillo, a picturesque town known for its strong cattle-raising tradition, rich cultural heritage, stunning coastal views, and expansive green fields. Hatillo is a hidden treasure that offers a unique blend of historical charm and modern attractions, inviting visitors to discover places like Playa Sardinera, Hacienda Mis Sueños, and Villa Madera. As a loyal customer of Banco Popular, Mr. Hernández is interested in handling his banking matters while traveling at the Branch Hatillo, which is why he wants to visit it. Additionally, he knows that its location is near establishments like Burger King, where he frequently enjoys a meal as a regular customer. For Mr. Hernández, having a trustworthy bank nearby enhances his travel experience, giving him peace of mind to handle his banking tasks without worry. However, since October 2024, he has become aware of the architectural barriers at the branch, which discourage him from visiting the branch and accessing the services he needs. The barriers he is aware of are the following:

- 95.1. Raised service counter: Mr. Walberto knows about the high beige counter at the bank, which presents a significant barrier due to his use of a wheelchair for mobility. The height of the counter prevents him from having a clear line of sight with the staff assisting him, making direct communication difficult. Additionally, he cannot easily reach documents or devices necessary to complete his transactions, forcing him to stretch or seek assistance, which causes discomfort and dependency on others. This barrier affects his ability to manage his banking matters independently, creating frustration as he cannot interact with the space on equal terms. This barrier leaves him discouraged from visiting the branch.
- 95.2. Limited-depth counter: Mr. Walberto acknowledges that the bank's beige counter is shallow, which also creates a mobility barrier. As a wheelchair user, he needs sufficient space to approach the counter and handle his transactions. However, the limited depth prevents him from positioning his wheelchair close enough, leaving him at a distance that makes it difficult to handle documents, sign papers, or use the available devices. This situation requires him to exert extra effort with his arms, causing discomfort and restricting his independent access to banking services. This issue makes him feel discouraged from visiting the branch.
- 95.3. The barriers at Branch Hatillo could be eliminated by implementing practical adjustments to the counters. The high counter could be replaced or modified to include a lower, accessible section that allows for direct visual contact and easy communication with the staff, while also enabling convenient access to documents and devices without the need for external assistance. Additionally, the shallow counter should be redesigned to provide greater depth, ensuring sufficient

space for a wheelchair to approach comfortably and facilitate the handling of paperwork and the use of banking equipment. These modifications should prioritize functionality and ease of access.

Banco Popular's Hormigueros Branch

96. Mr. Uriel Sepúlveda enjoys exploring Puerto Rico's diverse towns and discovering their unique charm, with a particular interest in visiting Hormigueros, a destination known for its religious, patriotic, and cultural tourism. In Hormigueros, He intends to visit iconic sites like Casa Márquez, the Basilica Menor Nuestra Señora de la Monserrate, the Primera Iglesia Presbiteriana, and the historic Torrens Bridge, all of which reflect the town's rich heritage. Banco Popular stands out to him as a trustworthy institution due to its accessible banking solutions, which allow clients to handle their finances with ease. Therefore, He is especially drawn to visiting the Branch Hormigueros to manage his finances during his visit to Hormigueros. Also, it is located near Plaza Monserrate and the well-known panadería Casa Blanco, where he intends to stop for a delicious, freshly baked treat as part of his visit. However, since November 2024, Mr. Sepúlveda has been aware of the architectural barriers at the branch, which have discouraged him from visiting the branch and accessing its services. The barriers he knows are the following:

96.1. Counter at an inaccessible height: Mr. Uriel recognizes that the counter at the bank is too high, which makes it difficult for him to complete basic transactions. The elevated surface requires him to extend his arms and shoulders beyond his natural range of motion, causing immediate discomfort due to the limited flexibility in his spine. Using a walker for support, he cannot step close enough to the counter to stabilize himself while handling paperwork. This forces him to

stand in an awkward position, straining his back and making it challenging to perform tasks such as signing documents or counting money. Because of this barrier, he feels dissuaded from visiting the branch.

96.2. Restricted maneuvering space: Mr. Uriel Sepúlveda notices that the counter area does not provide enough open space for him to use his walker comfortably. Since he requires proper support to remain balanced, the lack of room forces him into awkward and unstable positions, increasing the strain on his lower back and making it difficult to stand for long periods. The inadequate space also limits his ability to move closer to the counter, forcing him to stretch in ways that aggravate his osteoarthritis and lumbar pain. The physical discomfort and added difficulty in conducting simple transactions make his visits stressful and exhausting, as a consequence of this barrier, he is dissuaded from visiting the branch.

96.3. The barriers at Branch Hormigueros could be eliminated by lowering the counter to a suitable height that allows for direct and comfortable access, avoiding the need for unnecessary stretching or awkward positioning. Moreover, the floor space near the counter must be expanded to allow for smooth and unrestricted movement, eliminating any obstacles that may interfere with positioning. Any unnecessary fixtures or objects that create obstructions should be relocated or removed to improve accessibility. These improvements should be made using durable materials that preserve the counter's functionality while enhancing ease of use. Eliminating these barriers makes it possible for Mr. Uriel to comfortably visit the branch and take advantage of its services.

Banco Popular's Humacao Branches

97. Mr. Carlos Molina, a customer of Banco Popular, has a strong interest in visiting Humacao, a coastal town known for its stunning tropical shores, such as Playa Salvaje and Punta Candelerio. These picturesque beaches, with their crystal-clear waters and soft sands, provide Mr. Molina with the perfect setting for relaxation and enjoyment. Humacao also attracts nature enthusiasts, including Mr. Carlos, with destinations like the Humacao Nature Reserve and Lake Humacao, where visitors can experience the region's diverse wildlife through activities like recreational fishing. Additionally, the town boasts a rich culinary tradition, which he wants to enjoy, featuring Caribbean dishes made with flavorful local ingredients such as cassava, chayote, and corn, often paired with savory rice and chicken or beef.
98. Mr. Molina wants to visit Branch Palmas del Mar to handle his banking transaction conveniently located near the Park Royal Homestay Club Cala Puerto Rico, a three-star hotel he considers an excellent accommodation option. He also appreciates the branch's proximity to well-known establishments like Pura Vida Food & Fun, a seafood restaurant, Koffy Brunch & Bistro, a popular breakfast spot, and Palmas Market & Deli, a supermarket for travelers. However, since December 2024, Mr. Molina has been aware of certain architectural barriers at the branch that make it difficult for him to access these services. As a result of these barriers, he is discouraged from visiting the branch. The barriers he has identified include the following:
- 98.1. Counter at an inaccessible height: Mr. Carlos Molina is conscious of the barrier presented by the high counter, which exceeds 36 inches in height, at the bank. Due to his use of a wheelchair for mobility, this elevated surface significantly hinders his ability to complete transactions independently. The height of the

counter is beyond his line of sight and reach, making it difficult for him to hand over documents, sign paperwork, or interact with the teller without external assistance. The design of the counter does not accommodate his seated position, creating a physical obstruction that complicates his banking experience. Because of this barrier, he is discouraged from visiting the branch.

98.2. Limited-depth counter: Mr. Carlos Molina recognizes the obstacle posed by the shallow counter at the bank. The limited depth of the counter does not provide sufficient space for him to comfortably position his wheelchair close enough to conduct his banking tasks. The lack of depth forces him to stretch uncomfortably to access items on the counter, which is particularly challenging given his need to maintain balance while seated. This barrier directly interferes with his ability to manage documents and handle transactions with ease, affecting his overall access to banking services. Due to this barrier, he feels dissuaded from visiting the branch.

98.3. The barriers at Branch Palmas del Mar could be eliminated by lowering the height of the counter to no more than 36 inches, ensuring it is accessible for individuals using wheelchairs. The counter should also be designed with a deeper surface to allow adequate space for users to approach comfortably and interact with the bank staff. These adjustments make the counter more reachable, enabling easier access to documents and facilitating smoother transactions. Installing an adjustable counter further enhances accessibility by providing flexibility in height, ensuring it remains within a manageable range at all times.

99. Additionally, Mr. Molina is interested in visiting the Branch Palma Real, located conveniently in the Plaza Palma Real shopping center. This branch is near several popular spots like Walmart, the Tex-Mex restaurant Chili's Grill & Bar, the fast-food chain Chick-fil-A, Empire Kitchen, and the well-loved Panda Express, making it an ideal stop for both banking and dining. The branch offers essential services like personal assistance from tellers, and reliable customer support. Due to these reasons, Mr. Molina wants to handle his banking transactions at this branch. However, since November 2024, he has been aware of certain architectural barriers that limit his ability to fully access its services. Because of these barriers, he feels dissuaded from going to the branch. The barriers he knows are as follows:

- 99.1. Counter Height: Mr. Carlos Molina has knowledge of the barrier caused by a counter that exceeds 36 inches in height. Due to his Muscular Dystrophy and the fact that he uses a wheelchair for mobility, he is unable to reach the counter comfortably. The height forces him to stretch excessively, which is physically challenging due to his limited muscle strength and coordination. This makes it extremely difficult for him to place or receive documents from the counter, as he cannot align himself properly with it. The lack of accessibility causes him to struggle in completing even simple tasks, resulting in delays and frustration. This barrier discourages him from visiting the branch.
- 99.2. Narrow counter: Mr. Carlos Molina realizes about the barrier posed by a shallow counter, which prevents him from getting close enough to it while seated in his wheelchair. Due to his Muscular Dystrophy, his ability to move his wheelchair forward is restricted, and the shallow depth of the counter makes it impossible for

him to reach across it comfortably. He cannot position himself in a way that allows for smooth interaction with the bank staff. This lack of space forces him to attempt awkward and uncomfortable reaches, causing strain on his body and leading to difficulty in performing tasks such as signing papers or receiving documents. Due to this barrier, he feels dissuaded from visiting the branch.

99.3. The barriers at Branch Humacao Palma Real could be eliminated by reducing the counter height to a level that allows for easier access, ensuring that it can be reached without excessive effort. Additionally, increasing the counter's depth provides enough space to approach directly and conduct transactions more comfortably. These modifications remove the physical strain of having to reach over a high or shallow counter, making tasks like signing or exchanging documents more manageable. Implementing an adjustable counter section further enhances usability, allowing for a more efficient and practical banking experience.

100. While in Humacao, Mr. Molina is interested in visiting the Branch Humacao Este, conveniently located in Triumph Plaza Humacao. This branch is situated near key places such as Ralph's Food Warehouse supermarket, Good Taste Chinese Restaurant, and Papa John's Pizza, which makes it easy for Mr. Molina manages his errands while enjoying the local dining options. Due to these reasons, Mr. Molina wants to handle his banking transactions at this branch. However, since November 2024, he has been aware of architectural barriers at the branch, which prevent him from fully accessing its services. As a consequence of the barriers, he feels discouraged from visiting the branch. The barriers he knows are as follows:

- 100.1. Difficult to reach counter: Mr. Carlos Molina is conscious of the difficulty posed by a counter that stands over 36 inches tall. Because of his Muscular Dystrophy and reliance on a wheelchair, he cannot comfortably reach the counter's surface. His condition impairs his ability to stretch or elevate himself sufficiently to interact with the staff or manage necessary paperwork. This height barrier forces him to make significant physical efforts, which are exhausting and not feasible with his limited range of motion, creating obstacles in performing routine tasks like filling out forms or handling documents. Due to this obstacle, he is discouraged from going to the branch.
- 100.2. Short depth counter: Mr. Carlos Molina recognizes the challenges presented by the shallow counter. The counter's design, being too narrow, restricts his ability to get close enough while sitting in his wheelchair. His Muscular Dystrophy further limits his movement, making it difficult for him to position his wheelchair at a convenient angle to reach the counter. The shallow design forces him to stretch over the counter, which is physically taxing and inefficient. He faces challenges in organizing documents, signing forms, or interacting with staff in a comfortable and accessible manner, leading to delays and discomfort. Owing to this barrier, he feels discouraged from visiting the branch.
- 100.3. The barriers on Branch Humacao Este could be eliminated by adjusting the counter height to a level that allows for easier access without requiring excessive reaching. Additionally, increasing the counter depth provides enough space to move closer and interact more effectively during transactions. This modification reduces the need to stretch uncomfortably, minimizing physical strain and making

interactions more efficient. Installing a height-adjustable counter could further enhance accessibility, ensuring a more practical and comfortable experience.

Banco Popular's Isabela Branch

101. Mr. Hernández, a loyal Banco Popular client, frequently visits Isabela, drawn by its stunning beaches and picturesque surroundings, making it one of his favorite destinations. Given how often he travels there, he likes to have the opportunity to visit Banco Popular's Isabela branch during his trips. He values the bank for its strong reputation, stability, and status as one of the most trusted financial institutions in Puerto Rico and the Caribbean. Furthermore, Banco Popular's broad network of branches and ATMs offers greater accessibility and convenience compared to many competitors. However, despite these advantages, Mr. Hernández has been aware of architectural barriers at the Isabela branch since October 2024. These obstacles raise concerns about accessibility, as they hinder his ability to enter and navigate the branch, creating an unequal experience for him. Mr. Hernández has identified the following architectural barriers at Banco Popular's Isabela branch.

101.1. Tall Transaction and Customer Service Counters: Walberto Hernández Reyes has observed that the transaction and customer service counters at Banco Popular's Isabela branch are too high for individuals using a wheelchair. Given his condition, which requires him to rely on a wheelchair for mobility, he is unable to reach the counter comfortably. This significantly hinders his ability to interact with bank employees, conduct transactions, and receive assistance independently. The excessive height of the counters creates an unnecessary challenge, making it difficult for him to access essential banking services.

- 101.2. Mr. Hernández Reyes has also noted that the counters at the Isabela branch lack sufficient depth, preventing him from positioning his wheelchair close enough to complete transactions comfortably. This forces him to overreach, creating unnecessary strain and limiting his ability to bank independently.
- 101.3. The barriers at Banco Popular's Isabela branch could be addressed by modifying the transaction and customer service counters to align with ADA accessibility standards. Lowering the counters to an appropriate height ensures that individuals using wheelchairs, like Mr. Hernández Reyes, can engage with bank staff without difficulty. Additionally, increasing the counter depth allows wheelchair users to approach them more comfortably, making it easier to sign documents, receive items, and complete transactions.

Banco Popular's Jayuya Branch

102. Mr. Uriel, an individual who relies on a walker for mobility, has long been interested in becoming a Banco Popular client. Beyond the bank's strong reputation for stability and reliability in Puerto Rico and the Caribbean, he values its extensive branch network, which offers convenience and accessibility. One of the locations he is particularly eager to visit is Banco Popular's Jayuya branch. Jayuya, with its breathtaking mountain landscapes, refreshing rivers, and cultural heritage, is one of Mr. Uriel's favorite regions. He enjoys traveling there and likes to access banking services at the local branch during his visits. However, despite Banco Popular's many advantages, he has been aware of accessibility challenges at the Jayuya branch, since November 2024.
- 102.1. Tall Transaction and Customer Service Counters: Mr. Uriel has observed that the transaction and customer service counters at Banco Popular's Jayuya branch are

too high for individuals who rely on a walker for mobility. Given his condition, which makes prolonged standing difficult, he struggles to maintain balance while reaching up to interact with bank employees. The excessive counter height forces him to stretch uncomfortably, making it challenging to conduct transactions, sign documents, or receive assistance without physical strain.

102.2. Mr. Uriel has noticed that the counters lack sufficient depth, preventing him from positioning himself close enough while using his walker. This restriction limits his ability to stabilize himself while handling banking tasks, forcing him to shift his weight unsteadily or lean on the counter for support. As a result, these barriers create a frustrating and unequal banking experience compared to customers without mobility impairments.

102.3. The accessibility challenges at Banco Popular's Jayuya branch could be resolved by adjusting the transaction and customer service counters to meet ADA standards. Reducing the counter height allows individuals who use mobility aids, like Mr. Uriel with his walker, to interact with bank staff more comfortably. Additionally, extending the counter depth provides the necessary space for him to position himself securely, making it easier to complete transactions, sign documents, and receive banking materials without difficulty..

Banco Popular's Juana Diaz Branch

103. Mr. Uriel, who depends on a walker for mobility, has been interested in joining Banco Popular due to its strong reputation and commitment to serving communities across Puerto Rico and the Caribbean. He appreciates the institution's long-standing reliability and the convenience it offers to its customers. Juana Díaz is a town that holds special

meaning for him, not only because of its famous Three Kings Day festivities but also due to its proximity to Ponce, where he resides. Given how often he visits the area, he loves the opportunity to manage his banking needs there. However, since November 2024, he has become aware of accessibility barriers that make it difficult for him to handle transactions comfortably. These concerns raise questions about his ability to navigate the space independently and receive the same level of service as other customers.

- 103.1. Mr. Uriel has noticed that the transaction and customer service counters at Banco Popular's Juana Díaz location are set at a height that poses challenges for individuals who use a walker. Since standing for extended periods is physically demanding for him, reaching up to interact with bank staff becomes difficult. The elevated counter height forces him to stretch beyond his comfort level, making it harder to complete transactions, sign documents, or receive assistance without strain.
- 103.2. Mr. Uriel is aware that the counters do not provide enough depth, preventing him from getting close enough while using his walker. This lack of space makes it difficult for him to stabilize himself properly, often requiring him to shift his weight uncomfortably or lean against the counter for support. These limitations create an unnecessarily challenging and unequal experience, making routine banking tasks more difficult compared to those who do not face mobility restrictions.
- 103.3. To address these accessibility challenges at Banco Popular's Juana Díaz branch, the transaction and customer service counters should be adjusted to meet ADA standards. Lowering the counter height allows individuals using walkers, like Mr.

Uriel, to interact with bank staff without discomfort. Additionally, increasing the counter depth enables him to position himself properly, providing the necessary support to complete transactions, sign documents, and receive assistance safely.

Implementing these modifications creates a more inclusive and accessible banking environment for all customers.

Banco Popular's Juncos Branch

104. Mrs. Bonnelis Cepeda is a client of Banco Popular, relying on the institution for its efficient account management, diverse financial services, and personalized attention that allows her to conduct her transactions comfortably and securely. She is interested in visiting the Banco Popular branch in Juncos, as it provides her with the opportunity to handle her banking matters in person with the quality service she expects.
105. Additionally, the location of the branch in Juncos is convenient for her because the area offers a dynamic environment with access to shops, restaurants, and places of interest. She knows that Juncos features Parque de los Próceres, an open space where she can enjoy the surroundings, as well as multiple commercial establishments that allow her to complete various errands in one visit. She wants to go to this branch as it represents an ideal combination of accessibility and convenience, allowing her to manage her banking while benefiting from the town's resources. However, she feels dissuaded from visiting the branch due to multiple accessibility barriers at the service area and counter, which hinder her ability to conduct her transactions independently and without difficulties. Mrs. Cepeda has paralysis on the right side of her body, rendering her right hand completely immobile, meaning she must perform all her transactions with her left hand. These

barriers immediately impact her banking experience, preventing her from operating as easily as other customers. The accessibility barriers she faces are as follows:

106. Counter Height That Complicates One-Handed Interaction: Mrs. Bonnelis Cepeda is aware that the service counter at the Juncos branch is too high, exceeding 36 inches, which prevents her from comfortably reaching the service surface. Since she can only use her left hand, the lack of an accessible section forces her to raise her arm to an uncomfortable position to sign documents, receive cash, or handle her card. This barrier causes immediate fatigue and makes completing transactions more difficult, requiring her to exert additional effort for each task. She feels dissuaded from visiting this branch because the counter's height restricts her ability to receive service without unnecessary obstacles.

- 106.1. Lack of an Accessible Support Surface for One-Handed Interaction: Mrs. Bonnelis Cepeda is aware that the counter does not provide an accessible surface where she can place her documents and personal items securely while conducting her transactions. Due to her condition, she relies exclusively on her left hand to hold and handle her belongings, increasing the risk of dropping documents, money, or cards while trying to complete a transaction. The absence of a support area forces her to manage her documents in an unstable and unsafe manner, which negatively affects her ability to complete her banking transactions smoothly. She feels dissuaded from visiting this branch because the lack of a support area limits her independence in managing her transactions.

- 106.2. The accessibility barriers identified at the Banco Popular branch in Juncos can be eliminated through structural modifications to the service counter, allowing Mrs.

Bannelis Cepeda to conduct her transactions safely and without restrictions. It is essential to adjust the counter height by incorporating an accessible section that does not exceed 36 inches, ensuring she can interact with the staff without having to lift her arm into an uncomfortable position. Additionally, installing a stable and accessible support surface allows her to place documents, money, and personal belongings securely, preventing her from having to hold multiple objects with one hand, reducing the risk of dropping them, and ensuring a comfortable, efficient, and independent banking experience. Once these modifications are implemented, Mrs. Bannelis Cepeda can visit the Juncos branch and manage her financial matters without unnecessary obstacles, in full compliance with the Americans with Disabilities Act (ADA).

Banco Popular's Lajas Branch

107. Mr. Uriel enjoys traveling to Lajas because it offers the perfect balance between coastal tranquility, excellent cuisine, and rich local culture. Every time he visits La Parguera, he strolls along the boardwalk, indulges in fresh seafood from local kiosks, and relaxes with the sea breeze while watching fishermen and tourists embark on diving and boating excursions. As the sun sets, he appreciates the lively atmosphere that transforms the area with live music and an energetic, festive vibe. He is particularly drawn to Banco Popular for its well-established presence and convenient locations, and he is especially interested in the Las Lajas branch. Having access to a reliable financial institution in a place he frequently visits is highly beneficial. However, he is aware of architectural barriers at the branch that make access difficult, discouraging him from visiting since November 2024 and limiting his ability to explore the services the bank has to offer:

- 107.1. Overly High Customer Service Counter: Mr. Uriel is aware that the customer service counter at the Las Lajas branch is too high, which significantly affects his ability to receive assistance or sign documents comfortably. Due to his damaged lumbar disc, bilateral cervical and lumbar radiculopathy, and chronic osteoarthritis in his spine and sacroiliac joints, he needs to maintain a stable and upright posture while using his walker. However, the excessive height of the counter forces him to lean forward uncomfortably, causing him discomfort and physical strain. This situation makes it difficult for him to complete his transactions independently and communicate efficiently with the bank staff. Mr. Uriel feels completely discouraged from visiting the branch due to the physical barriers that hinder his experience.
- 107.2. Lack of Depth at the Counter: Mr. Uriel has also noticed that the customer service counter lacks sufficient depth, making it extremely difficult for him to approach it while using his walker. The limited space prevents him from positioning himself properly, forcing him to make uncomfortable adjustments just to reach the counter. This not only affects his stability but also increases his discomfort, as he cannot maintain a secure posture while handling his banking transactions. The lack of depth at the counter creates an unnecessary physical challenge, making his experience at the branch uncomfortable and inefficient. Due to these architectural barriers, he feels discouraged from visiting the branch as it is difficult for him to access comfortably.
- 107.3. To improve Mr. Uriel's experience at the Las Lajas branch, it is recommended to adjust the design of the customer service counter by incorporating a lower-access

section with a maximum height of 91 cm (36 inches), allowing him to interact comfortably without needing to lean or strain his posture. Additionally, the depth of the counter should be increased so he can approach it with his walker without difficulty, ensuring he has enough space to position himself stably and securely. Implementing these modifications ensures that Mr. Uriel can carry out his banking transactions with greater comfort, independence, and efficiency, eliminating the barriers that currently hinder his access to financial services.

Banco Popular's Lares Branch

108. Mr. Walberto Hernández, a Banco Popular client, wants to visit the Lares branch to personally manage his financial affairs and ensure that each transaction is handled clearly and accurately. He prefers to visit the branch in person because Banco Popular provides a reliable network of banking services, accessible tools for managing his accounts, and the assurance of assistance when needed. His experience as a customer has been positive, as he finds that Banco Popular facilitates his financial operations with efficient solutions and personalized service.
109. Additionally, Mr. Hernández's interest in visiting Lares extends beyond the banking services. Lares is a historically and culturally significant town, with a cool, mountainous environment that he finds appealing. He is motivated to visit the area to enjoy the peaceful atmosphere, explore its urban center, and visit landmarks such as the Plaza de la Revolución and the famous Heladería de Lares, known for its unique variety of ice cream flavors. However, his desire to explore and enjoy these spaces is directly linked to his need to conduct banking transactions at the Banco Popular branch. Despite his genuine desire to visit the branch, since november 2024 he feels dissuaded from doing so due to

multiple accessibility barriers that directly and immediately affect his ability to enter, move around, and receive service without restrictions. Because of his spina bifida and hydrocephalus, he relies on a wheelchair for mobility, and his conditions, including kidney damage, epilepsy, high blood pressure, and asthma, reduce his physical endurance. This makes it essential for the branch to provide an accessible environment without obstacles that prevent him from receiving equitable service. The accessibility barriers preventing him from visiting the branch are as follows:

110. Service Counter is Too High, Preventing Proper Assistance: Mr. Walberto Hernández is aware that the service counter at the Lares branch does not have an accessible section, preventing him from reaching the surface from his wheelchair. Due to his limited range of motion, he cannot raise his arms high enough to sign documents or handle cash without great effort and immediate discomfort. This forces him to depend on bank personnel for basic transactions, compromising his privacy and independence. He feels dissuaded from visiting this branch because this barrier prevents him from receiving the same level of service as other customers.

- 110.1. Lack of a Secure Area to Place Documents and Cash: Mr. Walberto Hernández is aware that the service area lacks an accessible surface where he can place his documents and money securely while conducting his transactions. As a result, he is forced to hold them in his lap or in the air, which makes handling money difficult and increases the risk of important documents falling to the floor. Because of his spina bifida and hydrocephalus, performing repeated hand movements causes fatigue and difficulty holding objects for extended periods, making this issue even more problematic. He feels dissuaded from visiting this

branch because this lack of accessibility prevents him from completing his banking tasks practically and without difficulty.

110.2. Inadequate Space in Front of the Counter for Wheelchair Users: Mr. Walberto Hernández is aware that the area in front of the counter does not have enough depth, making it impossible for his wheelchair to properly position for service. The lack of this zone forces him to position himself uncomfortably and perform unnecessary maneuvers, which affects his stability and communication with staff. His high blood pressure and asthma make these additional efforts cause immediate fatigue and breathing difficulties, worsening his experience inside the bank. He feels dissuaded from visiting this branch because he cannot properly position himself to conduct his transactions without obstacles.

110.3. The accessibility barriers identified at the Banco Popular branch in Lares can be eliminated through structural modifications that allow customers with disabilities to receive service on equal terms. To ensure accessibility, it is essential to modify the service counter, incorporating a section at a height of 36 inches or less, allowing Mr. Walberto Hernández to comfortably and easily reach the surface. Additionally, an accessible functional surface should be installed, ensuring he can place documents and belongings securely while conducting transactions. The space in front of the counter must be reconfigured so that his wheelchair can position without restrictions. Once these solutions are implemented, Mr. Walberto Hernández can visit the Banco Popular branch in Lares and conduct his banking transactions independently, accessibly, and without barriers, in full compliance with the Americans with Disabilities Act (ADA)

Banco Popular's Las piedras Branch

111. Mrs. Bonnelis likes to travel to municipalities near her residence, including Las Piedras, where she appreciates various cultural events such as the Annual Artisan Festival, the Fiesta del Güiro, and the Fiesta del Lechón. She also values the plazas and museums in the area. As a customer of Banco Popular, the Las Piedras branch serves as a convenient location for her banking transactions. Since November 2024, she has been aware of architectural barriers at this branch that limit accessibility. These barriers create concerns about facing a discriminatory situation and not receiving the same level of access as customers without disabilities. As a result, she feels discouraged from going to the branch. Mrs. Bonnelis is aware of the following architectural barriers at Banco Popular de Puerto Rico – Las Piedras Branch:

111.1. Extremely Tall Transaction And Customer Service Counters: Mrs. Bonnelis Cepeda is aware of significant difficulties when using the transaction and customer service counters at Banco Popular's Las Piedras branch due to her paralysis in her right arm. The height of the counter forces her to lift her only functional arm beyond a comfortable range, making it challenging to sign documents, receive cash, or use her card efficiently. Without the ability to rely on both hands, picking up or placing down items securely becomes a struggle, increasing the likelihood of dropping money, documents, or personal belongings. The lack of a suitable support surface adds further strain, as she must hold items for prolonged periods without relief, making transactions unnecessarily difficult and physically tiring. These obstacles create an exclusionary and frustrating

experience, turning simple banking tasks into unnecessary challenges. As a result, she feels discouraged from going to the branch.

- 111.2. To improve accessibility for Mrs. Bonnelis Cepeda at the Las Piedras branch, the transaction and customer service counters should be modified to include a lower, ADA-compliant section that allows customers with limited mobility to comfortably complete their transactions. This section should provide a surface at an appropriate height, enabling her to place and retrieve documents, cash, and personal belongings without unnecessary strain. These adjustments eliminate physical discomfort, reduce the risk of dropping important items, and allow her to complete transactions independently, ensuring a more inclusive and accessible banking experience.

Banco Popular's Loíza Branch

112. Mr. David Figueroa is a customer of Banco Popular and enjoys exploring Puerto Rico. He particularly loves traveling to Loíza, where he immerses himself in its rich cultural heritage, savors its delicious traditional cuisine, and explores its many tourist attractions. He appreciates visiting beaches like La Pocita, Aviones, Tocones, and Puente Herrera, as well as landmarks such as Parque Julia Burgos and the house of the renowned artist Samuel Lind. As a Banco Popular customer, he values the financial services provided at the Loíza branch, recognizing its efficient processing, attentive customer care, and reliable assistance with banking needs. The branch's location near Plaza De Loíza, Iglesia Tabernáculo de Restauración Monte Sion, Parroquia del Espíritu Santo y San Patricio, and popular dining spots like Pollos Picau and Un Buen Café adds to its convenience. Completing his banking errands in this area allows him to enjoy the nearby amenities.

However since November 2024, Mr. Figueroa has been aware of the architectural barriers at the branch, which make access difficult. These obstacles limit his ability to use the services due to his health condition, creating additional challenges. As a result, he feels discouraged from going to the branch. Mr. David Figueroa is aware of the following architectural barriers at Banco Popular de Puerto Rico – Loíza Branch:

- 112.1. Extremely Tall Transaction And Customer Service Counters: Mr. David Figueroa is aware that the transaction and customer service counters at Branch Loíza are extremely tall, preventing him from using them effectively. Due to his quadriplegia and the use of a wheelchair, he cannot reach the counter surface without difficulty. This barrier prevents him from handing over or receiving documents and money without assistance, limiting his independence when conducting banking transactions. Additionally, his reduced mobility prevents him from lifting his arms to the necessary height to comfortably interact with bank staff, causing frustration and making it harder for him to access financial services on equal terms with other customers. This situation makes him feel discouraged from going to the branch.
- 112.2. Counters Without Depth: Mr. David Figueroa is aware that the counters at Branch Loíza do not have the necessary depth to allow him to approach them frontally with his wheelchair. Due to this design flaw, he is forced to position himself sideways or stretch uncomfortably to communicate with bank staff. This barrier prevents him from placing his wheelchair in a stable and comfortable position, further complicating his interaction with the counter. The lack of adequate space for a frontal approach restricts his access to banking services and prevents him

from conducting transactions independently, creating an unequal experience compared to other customers. Due to these difficulties, he feels discouraged from visiting the branch.

- 112.3. The barriers at Branch Loíza could be eliminated by lowering the height of the transaction and customer service counters to ensure they are within an accessible range for individuals who use wheelchairs. This change allows Mr. David Figueroa to comfortably reach the counter surface, enabling him to complete his transactions independently without requiring assistance. Additionally, modifying the counters to provide adequate depth for a proper frontal approach allows him to position his wheelchair directly in front of them, eliminating the need for awkward side positioning or uncomfortable stretching. These modifications ensure that Mr. Figueroa can access banking services in a safe, comfortable, and independent manner, allowing him to conduct his transactions on equal terms with other customers.

Banco Popular's Luquillo Branch

113. Luquillo, known as the "Capital of the Sun," is a destination that Mr. David Figueroa enjoys for its stunning beaches, rich local culture, and vibrant natural scenery. He appreciates spending time at Luquillo Beach, Balneario La Monserrate, and Playa La Pared, as the coastal atmosphere provides a relaxing escape. His interest in history and culture also leads him to explore landmarks such as the Parroquia de San José. The Banco Popular branch in Luquillo is conveniently located for him to manage his financial needs. However, since November 2024, he has been aware of architectural barriers at the branch that make access difficult. These obstacles interfere with his ability to use the bank's

services due to his health condition, creating unnecessary challenges. As a result, he feels discouraged from going to the branch. Mr. David Figueroa is aware of the following architectural barriers at Banco Popular de Puerto Rico – Luquillo Branch:

- 113.1. Transaction And Customer Service Counters That Are Too High: Mr. David Figueroa is aware that the transaction and customer service counters at the Banco Popular de Puerto Rico branch in Luquillo are too high for him to use effectively. As a wheelchair user with quadriplegia, he cannot comfortably reach the counter surface, making it impossible to handle documents, receive cash, or complete transactions without assistance. The excessive height of the counter also forces him into uncomfortable and physically straining positions, further complicating his ability to manage his financial needs. This lack of accessibility prevents him from conducting his banking affairs with the same ease as other customers. As a result, he feels discouraged from going to the branch.
- 113.2. Counters Without Sufficient Depth for a Frontal Approach: Mr. David Figueroa is aware that the counters at the Luquillo branch do not provide enough depth for him to approach them directly in his wheelchair. The limited space prevents him from positioning himself properly, forcing him to maneuver awkwardly and creating unnecessary physical strain. Without the ability to align his wheelchair in a stable and practical position, completing routine banking tasks becomes far more difficult. This design flaw adds yet another barrier that limits his independence and access to services. As a result, he feels discouraged from going to the branch.

113.3. The barriers at Branch Luquillo could be eliminated by lowering the height of the transaction and customer service counters to ensure they are within an accessible range for individuals who use wheelchairs. This modification allows Mr. David Figueroa to reach the surface comfortably, enabling him to conduct his banking transactions independently without needing assistance. Additionally, redesigning the counters to include sufficient depth for a proper frontal approach allows him to position his wheelchair directly in front of them, eliminating the need for awkward side positioning. These adjustments ensure that Mr. Figueroa can access banking services safely, comfortably, and with the same level of independence as other customers, providing him with an equitable and dignified banking experience.

Banco Popular's Manatí Branch

114. **Mr. David Figueroa**, a Banco Popular customer, enjoys traveling to Manatí, a town known as "*La Atenas de Puerto Rico*" for its rich cultural and historical significance. Living in San Juan, he appreciates the opportunity to step away from the city's fast pace and immerse himself in Manatí's breathtaking natural scenery, including its crystal-clear springs, lakes, and stunning natural reserves. The lush greenery provides a peaceful setting for relaxation and reconnection with nature.
115. The Banco Popular branch in Manatí is conveniently located for managing his banking needs while spending time in the area. However, since October 2024, he has noticed architectural barriers at the branch that make access difficult. These obstacles create unnecessary challenges, making transactions less comfortable and limiting his ability to conduct them with ease. As a result, he feels discouraged from visiting the branch. Mr.

David Figueroa is aware of the following architectural barriers at Banco Popular de Puerto Rico – Manatí Branch:

- 115.1. Extremely Tall Transaction And Customer Service Counters: Mr. David Figueroa is aware that the transaction and customer service counters at Branch Manatí Popular Center 1 are extremely tall, making it difficult for him to use them effectively. Due to his use of a wheelchair, he cannot comfortably reach the counter surface, preventing him from independently handling documents, receiving cash, or signing paperwork without assistance. This limitation makes him feel discouraged, as he encounters unnecessary obstacles that restrict his ability to manage his banking needs comfortably. Additionally, the effort required to lift his arms to reach the counter causes discomfort and fatigue, making transactions unnecessarily strenuous. The lack of accessibility at the counters compromises his independence and prevents him from managing his banking needs on equal terms with other customers.
- 115.2. Counters Without Depth: Mr. David Figueroa has also noticed that the counters at Branch Manatí Popular Center 1 lack the necessary depth, making it impossible for him to approach them directly with his wheelchair. Because of this design limitation, he is forced to position himself awkwardly sideways or stretch uncomfortably, which creates physical strain and discomfort. This situation discourages him, as it makes transactions unnecessarily difficult and affects his ability to access services with ease. The added strain impacts his stability while conducting transactions, making it harder to interact safely and efficiently. The lack of adequate space for a frontal approach restricts his mobility and limits his

access to financial services, creating an unequal experience compared to other customers.

115.3. The barriers at Branch Manatí Popular Center 1 could be eliminated by lowering the height of the transaction and customer service counters to ensure they are within an accessible range for individuals using wheelchairs. This adjustment would allow Mr. David Figueroa to comfortably reach the counter surface, enabling him to handle documents and money independently without requiring assistance. Additionally, modifying the counters to provide adequate depth for a proper frontal approach would allow him to position his wheelchair directly in front of them, eliminating the need for uncomfortable side positioning or excessive stretching. Implementing these modifications ensures that Mr. Figueroa can access banking services safely, comfortably, and independently, allowing him to conduct his transactions on equal terms with other customers.

116. During his trips to Manatí, Mr. David Figueroa finds it highly convenient to visit Supermercado Econo, where he takes advantage of its great prices and high-quality products to stock up on essentials during his stay. Given its proximity to the Banco Popular branch at Econo Manatí, handling his banking transactions while shopping is practical. However, since October 2024, he has been aware of the architectural barriers at the branch, which discourage him from visiting. These barriers hinder his ability to access financial services comfortably and independently, making it difficult for him to manage his transactions on equal terms with other customers. As a result, he feels dissuaded from going to the branch.

- 116.1. Transaction And Customer Service Counters That Are Too High: Mr. David Figueroa is aware that the transaction and customer service counters at Branch Econo Manatí are excessively high, making them difficult to use effectively. As a wheelchair user, he cannot comfortably reach the counter surface, preventing him from handling documents or money independently. This barrier forces him to rely on assistance for basic transactions, reducing his independence and making the banking process more challenging. Additionally, the effort required to extend his arms beyond his natural range to reach the counter causes discomfort and fatigue, making transactions unnecessarily physically exhausting. The lack of an accessible counter prevents him from conducting his transactions easily and independently, creating an unequal experience compared to other customers.
- 116.2. Counters Without Enough Depth for a Frontal Approach: Mr. David Figueroa is aware that the counters at Branch Econo Manatí do not provide the necessary depth for him to approach them directly in his wheelchair. Because of this design flaw, he is unable to position himself comfortably in front of the counter and is forced to approach from the side or stretch awkwardly to communicate with bank staff. This limitation makes it difficult for him to maintain a stable posture while conducting transactions, adding unnecessary strain to his body. The lack of an appropriate frontal approach restricts his ability to access banking services safely and comfortably, preventing him from managing his finances with the same ease as other customers.
- 116.3. The barriers at Branch Econo Manatí could be eliminated by lowering the height of the transaction and customer service counters to ensure they are within an

accessible range for individuals who use wheelchairs. This adjustment would allow Mr. Figueroa to comfortably reach the counter surface, enabling him to handle documents and money independently without requiring assistance. Additionally, modifying the counters to provide sufficient depth for a proper frontal approach would allow him to position his wheelchair directly in front of them, eliminating the need for awkward side positioning or excessive stretching. Implementing these improvements ensures that Mr. Figueroa can access banking services in a safe, comfortable, and independent manner, allowing him to conduct his transactions on equal terms with other customers.

Banco Popular's Maricao Branch

117. Mr. Sepúlveda enjoys traveling across Puerto Rico and has a particular appreciation for Maricao, a town known for its breathtaking natural beauty, coffee plantations, waterfalls, and fish farms. He values the opportunity to explore its rich history and scenic landscapes, frequently visiting places such as Parroquia San Juan Bautista and Hacienda Iluminada Coffee Farm. Because Banco Popular has a branch in this area he enjoys visiting, he wants to become a customer and access its services at the Maricao branch. Its location near Plaza Luis Muñoz Rivera, Colmado ERICOP supermarket, and the restaurant El Buen Café makes it a convenient place to manage his financial needs while enjoying his time in town. However Since November 2024, he has been aware of architectural barriers at the branch that make access difficult. These obstacles prevent him from handling transactions comfortably and create unnecessary challenges in using the bank's services. As a result, he feels discouraged from going to the branch. Mr.

Sepúlveda is aware of the following architectural barriers at Banco Popular de Puerto Rico – Maricao Branch:

- 117.1. Extremely Tall Transaction And Customer Service Counters: Mr. Uriel is aware that the transaction and customer service counters at Branch Maricao are extremely tall, preventing him from using them effectively. Due to his bilateral cervical and lumbar radiculopathy, as well as chronic osteoarthritis in his spine, it is difficult for him to stretch to reach the counter surface while relying on his walker for support. This limitation discourages him, as it creates unnecessary obstacles that make routine banking tasks far more difficult for him than for other customers. The need to stretch or strain his posture causes pain and discomfort, affecting his stability and making it more challenging for him to remain standing during the process. The lack of accessibility at the counters limits his autonomy and makes it difficult for him to access banking services on equal terms with other customers.
- 117.2. Counters Without Depth: Mr. Uriel is aware that the counters at Branch Maricao do not have the necessary depth to allow him to approach them frontally with his walker. Due to this design limitation, he is forced to position himself sideways or lean uncomfortably to interact with bank staff. This barrier not only makes accessing banking services difficult but also causes pain and tension in his lower back, worsening the discomfort he experiences from standing for extended periods. The lack of adequate space for a frontal approach restricts his mobility and prevents him from conducting his transactions comfortably and safely, affecting his independence when using the bank's services.

117.3. The barriers at Branch Maricao could be eliminated by lowering the height of the transaction and customer service counters to ensure they are within an accessible range for individuals who use mobility aids, such as walkers. This modification allows Mr. Uriel to reach the counter surface comfortably, enabling him to handle documents and complete transactions independently without requiring assistance. Additionally, redesigning the counters to provide sufficient depth for a proper frontal approach allows him to position himself directly in front of them with his walker, eliminating the need for awkward side positioning or excessive leaning. These adjustments ensure that Mr. Uriel can become a customer and access banking services safely, comfortably, and independently.

Banco Popular's Maunabo Branch

118. Mr. Carlos Molina appreciates exploring different destinations across Puerto Rico and has a particular interest in Maunabo, a town known for its beautiful beaches, natural landscapes, and rich history. He values Maunabo as a peaceful place to disconnect and relax, away from the busy, crowded areas. Some of the places he enjoys in Maunabo include Punta Tuna Lighthouse, Playa Maunabo, Playa Mario, La Iglesia San Isidro Labrador, and the Plaza de Recreo Municipal. Because Banco Popular has a branch in this area he enjoys, he sees it as a convenient location for managing his financial needs. The branch's proximity to the Plaza de Recreo Municipal, restaurants such as La Cocina de Juanita, Antojitos Nina, and El Streetjón, as well as supermarkets like Super Danny's Market, makes it an accessible stop while spending time in town. The ease of handling banking tasks while also enjoying a meal or shopping adds to its practicality. Since November 2024, he has been aware of architectural barriers at the branch that create

unnecessary obstacles. These limitations make it difficult for him to access services comfortably, affecting his ability to complete transactions without difficulty. Facing these challenges makes him feel discouraged from going to the branch. Mr. Carlos Molina is aware of the following architectural barriers at Banco Popular de Puerto Rico – Maunabo Branch:

- 118.1. Extremely Tall Banking Representative Counters: Mr. Carlos Molina is aware that the banking representative counters at Branch Maunabo are extremely tall, making it difficult for him to use them effectively. Due to his muscular dystrophy and reliance on a wheelchair, he cannot comfortably reach the counter surface, preventing him from independently handling documents or signing paperwork. This limitation forces him to depend on others for simple transactions, which takes away his ability to manage his banking needs as freely as other customers. The excessive height of the counter also creates an unnecessary physical barrier, making the banking process more complicated and frustrating for him. These challenges make him feel discouraged from going to the branch, as they prevent him from accessing services on equal terms with other customers.
- 118.2. Counters Without Depth for a Frontal Approach: Mr. Carlos Molina is aware that the counters at Branch Maunabo lack the necessary depth to allow him to approach them directly with his wheelchair. The counters, which are light gray with a cylindrical structure of the same color embedded horizontally slightly above the surface, further obstruct accessibility. This design forces him to position himself at an awkward angle or stretch uncomfortably, making the process unnecessarily difficult. This barrier prevents him from maintaining a stable and

comfortable posture while conducting his banking transactions, adding strain and discomfort. The inability to approach the counter properly limits his ability to complete transactions efficiently and creates an unnecessary obstacle that restricts his access to financial services. These challenges discourage him from going to the branch, as they make banking far more difficult than it should be.

- 118.3. The barriers at Branch Maunabo could be eliminated by lowering the height of the banking representative counters to ensure they are within an accessible range for individuals who use wheelchairs. This modification allows Mr. Carlos Molina to comfortably reach the surface, enabling him to handle documents and complete transactions independently without requiring assistance. Additionally, redesigning the counters to provide sufficient depth for a proper frontal approach allows him to position his wheelchair directly in front of them, eliminating the need for awkward side positioning or excessive stretching. These adjustments ensure that Mr. Molina can access banking services safely, comfortably, and independently, allowing him to conduct his transactions on equal terms with other customers.

Banco Popular's Mayaguez Branches

119. Mr. Uriel Sepúlveda loves traveling to Mayagüez, drawn by its rich cultural scene and the wide variety of attractions the city offers. He enjoys visiting places like the Parque de los Próceres, where he can immerse himself in a peaceful environment while connecting with the history of influential figures from the region. His fascination with astronomy has also led him to develop a special interest in the Planetarium at the University of Mayagüez, which he considers to be an enriching and educational experience. During his time in

Mayagüez, he appreciates the convenience of the various services and establishments, enhancing his overall experience in the area.

120. Mrs Uriel especially enjoys visiting Mayagüez Mall Centro, where he finds a diverse range of stores that allow him to shop and explore different options. While at this shopping center, he intends to visit the Banco Popular Mayagüez Mall Centro branch to take care of his banking needs. However, he is aware of the architectural barriers that create accessibility challenges due to his reduced mobility. The physical obstacles that hinder his movement discourage him from attempting to access the bank's services, limiting his ability to comfortably explore its offerings, and ultimately dissuading him from entering. The barriers are:

- 120.1. Excessively Tall Counter: Mr. Uriel Sepúlveda is aware that the counter at the branch is excessively high, making it difficult for him to use effectively. The elevated height prevents him from positioning himself comfortably and reaching the service area without difficulty, creating a barrier that affects his communication with the staff. This limitation restricts his ability to hand over documents, receive cash, or complete other transactions independently. Additionally, it forces him into an uncomfortable posture, further complicating his ability to access services properly. This barrier not only reduces his independence but also makes the banking process an uncomfortable and exhausting experience.
- 120.2. Lack of Space for Walker Access: Mr. Uriel Sepúlveda is aware that the counter at the branch lacks open space beneath it, preventing him from properly approaching the service area while using his mobility support device. The absence of this space makes it difficult for him to position himself correctly, which in turn affects his

interaction with staff and the completion of his transactions. This barrier forces him to remain in an awkward and uncomfortable posture, impacting both his comfort and safety while conducting his banking operations. As a result, what should be a simple transaction becomes a frustrating and exhausting process, further limiting his access to the financial services he needs. Mr. Uriel feels completely discouraged from visiting the branch due to the physical barriers that hinder his experience.

120.3. The barriers on the Banco Popular's Mayaguez Branches should be eliminated by making structural modifications that enhance accessibility for individuals with mobility challenges. Lowering the excessively high transaction counter to an accessible height allows Mr. Sepúlveda and others to comfortably reach the service area. Additionally, creating an open space beneath the counter enables individuals who use mobility support devices to properly position themselves, eliminating the discomfort and physical strain caused by the current design. By removing these barriers, he is no longer dissuaded from visiting the branch and has full access to the financial services he needs.

121. While in Mayagüez, Mr. Sepúlveda considers the Banco Popular branch at Mayagüez Mall Sur a convenient option due to its proximity to places of interest, including Tijuana's Bar & Grill and Wendy's, where he may stop for a meal. His interest in the bank, along with its excellent locations like Mayagüez Mall Sur, motivates him to become a client. However, Mr. Sepúlveda is aware that architectural barriers at the branch limit his access and mobility. Due to his condition, encountering obstacles that make

movement difficult discourages him from visiting and accessing the bank's services. The barriers are:

- 121.1. High Counter Barrier: Mr. Uriel Sepúlveda is aware that the counter at the Mayagüez Mall Sur branch is too high, making it difficult for him to use it effectively. The height of the counter creates a barrier that prevents him from comfortably reaching the service area, making certain transactions more challenging. This physical obstruction complicates tasks such as handing over documents, receiving cash, and conducting other banking operations in an efficient and comfortable manner. Furthermore, it forces him to adopt an uncomfortable posture, further limiting his access to financial services and making the banking experience unnecessarily exhausting and difficult. Mr. Uriel is so discouraged by the barriers he faces when attempting to access the branch that he feels completely dissuaded from going.
- 121.2. Space Limitations at the Counter: Mr. Uriel Sepúlveda is aware that the counter at the Mayagüez Mall Sur branch lacks the necessary open space underneath, preventing him from properly approaching it while using his mobility support device. This lack of accessibility makes it difficult for him to interact with bank staff and complete his transactions, forcing him to remain in a strained position that affects his comfort and safety. The inability to properly approach the counter turns a basic banking task into a frustrating and physically demanding experience, making it harder for him to access the services he needs. Due to these architectural barriers, he feels discouraged from visiting the branch as it is difficult for him to access comfortably.

- 121.3. The barriers on the Mayagüez Mall Sur branch could be eliminated by implementing key accessibility improvements that directly address the physical limitations imposed by the current counter design. The excessive height of the transaction counter must be reduced to a level that allows Mr. Sepúlveda to reach the service area comfortably without straining or adopting an unnatural posture. Additionally, modifying the counter to include adequate open space underneath ensures that Mr. Sepúlveda can approach it without obstruction. If these obstacles are removed, he no longer feels dissuaded from going to the branch and is able to access the financial services he requires without restrictions.
122. As part of his visit to Mayagüez, Mr. Sepúlveda is interested in visiting the Banco Popular branch at Méndez Vigo Mayagüez, taking advantage of its convenient location near Plaza Cristóbal Colón, a place of great cultural and historical significance that captivates him. However, despite his desire to visit the branch, he is aware that the architectural barriers at the location make access and mobility challenging. Given his condition, the certainty of facing obstacles that hinder his movement discourages him from attempting to use the bank's services. The barriers are:
- 122.1. Excessively Tall Counter: Mr. Uriel Sepúlveda is aware that the counter at the Méndez Vigo Mayagüez branch is set at a height that makes it difficult for him to use efficiently. The excessive elevation of the counter forces him to stretch or adopt an uncomfortable posture to complete his transactions, making the process unnecessarily exhausting. This limitation significantly restricts his ability to submit documents, collect cash, or sign necessary paperwork with ease. Additionally, it forces him into an uncomfortable position, further complicating

his access to banking services. This structural barrier limits his autonomy and turns a routine transaction into a physically exhausting and frustrating experience, which ultimately discourages him from attempting to visit the branch.

122.2. Counter Without Clearance: Mr. Uriel is aware that the Méndez Vigo Mayagüez branch also presents another accessibility challenge due to the lack of an open space beneath the counter. This prevents Mr. Sepúlveda from positioning himself properly while using his mobility support device, making it difficult for him to approach the service area as needed. The inability to get close enough to the counter disrupts his ability to interact efficiently with the staff and conduct his transactions smoothly. As a result, he is forced into an uncomfortable posture that compromises both his comfort and safety. What should be a simple and straightforward banking experience instead becomes an overwhelming and physically demanding task, making him feel dissuaded from using the bank's services.

122.3. The barriers on the Méndez Vigo Mayagüez branch could be eliminated by implementing key accessibility improvements that directly address the physical limitations imposed by the current counter design. The excessive height of the transaction counter must be reduced to a level that allows Mr. Sepúlveda to reach the service area comfortably without straining or adopting an unnatural posture. Additionally, modifying the counter to include adequate open space underneath ensures that he can approach it without obstruction. The elimination of these barriers prevents him from feeling dissuaded about visiting the branch and ensures unrestricted access to the financial services he depends on.

123. While in Mayagüez, Mr. Sepúlveda is also interested in visiting the Banco Popular branch at UPR Mayagüez, as its location near the Jesús T. Piñero Conservation Forest—an area that attracts him for its natural beauty and ecological significance—makes it a convenient place to manage his finances. Becoming a client of Banco Popular and being able to visit this branch allow him to handle his banking needs more efficiently during his visits to the area. However, despite his interest in the branch's location, Mr. Sepúlveda is aware that the architectural barriers present at the branch limit his access and complicate his mobility. As a result, he feels discouraged from visiting and utilizing the services the bank offers. The barriers are:

123.1. Inaccessible Counter Height: Mr. Uriel Sepúlveda is aware that the counter at the UPR Mayagüez branch is too high, making it difficult for him to use effectively. The height of the counter creates a barrier that complicates access to banking services, making transactions more difficult to complete comfortably and efficiently. Additionally, he is forced into an uncomfortable posture, making access to financial services unnecessarily difficult. This limitation turns what should be a routine banking experience into a frustrating and physically exhausting task.

123.2. Limited Space at the Counter: Mr. Uriel Sepúlveda is aware that the counter at the UPR Mayagüez branch does not provide sufficient open space underneath, making it impossible for him to approach it properly while using his mobility support device. The absence of this feature forces him to position himself awkwardly, which negatively impacts his ability to interact with staff and complete his banking operations efficiently. This structural barrier makes a

straightforward process unnecessarily complicated and physically demanding, limiting his access to essential financial services. Mr. Uriel is so discouraged by the barriers he faces when attempting to access the branch that he is entirely deterred from going.

123.3. The barriers on the UPR Mayagüez branch could be eliminated by modifying the existing counter to better accommodate individuals with mobility limitations. Currently, the excessive height of the counter prevents Mr. Sepúlveda from conducting his transactions independently, forcing him into an uncomfortable position that makes communication with staff unnecessarily difficult. Reducing the counter height allows him and others with similar accessibility needs to handle their banking needs with greater ease. Additionally, incorporating sufficient open space beneath the counter ensures that individuals who use mobility support devices can approach the service area without restriction, eliminating the additional strain caused by the current design. These modifications significantly enhance accessibility, allowing all customers to access financial services equitably and without unnecessary physical challenges.

124. While in Mayagüez, Mr. Sepúlveda is also interested in the Banco Popular branch at Mayagüez Suau due to its convenient location near Parque Suau and Cinco de Maya Restaurant, which are among the places he intends to explore. However, despite his interest in the branch, Mr. Sepúlveda, since November 2024, is aware that the architectural barriers at the location make it difficult for him to access and move around. This discourages him from visiting the branch and utilizing the bank's services. The barriers are:

- 124.1. Counter Height Barrier: Mr. Uriel Sepúlveda is aware that the counter at the Mayagüez Suau branch is excessively high, making it difficult for him to use comfortably. The elevated height of the counter prevents him from reaching the service area, restricting his ability to hand over documents, receive cash, or complete transactions independently. Additionally, it forces him into an uncomfortable posture that further complicates his access to services, turning a simple banking visit into an unnecessarily challenging experience. This situation leaves him feeling discouraged and dissuaded from visiting the branch.
- 124.2. Counter Without Clearance: Mr. Uriel Sepúlveda is aware that the counter at the Mayagüez Suau branch lacks the necessary open space underneath, making it impossible for him to approach the service area while using his mobility support device. This restriction makes it difficult for him to properly position himself, limiting his interaction with bank staff and making transactions unnecessarily complicated. As a result, he is forced to remain in an uncomfortable posture that affects both his comfort and security. This barrier transforms a simple banking task into a frustrating and physically demanding process.
- 124.3. The barriers on the Mayagüez Suau branch could be eliminated by making critical accessibility improvements to the transaction counter. The excessive height of the counter serves as a physical obstacle for Mr. Sepúlveda, preventing him from comfortably reaching the service area. Lowering the counter to an appropriate height eliminates this difficulty. Additionally, ensuring that the counter has open space beneath it allows individuals who rely on mobility support devices to properly position themselves, eliminating the discomfort and physical limitations

imposed by the current structure. By making these necessary modifications, he is no longer dissuaded from accessing the branch and has guaranteed access to the financial services he needs.

Banco Popular's Moca Branch

125. Mr. Uriel Sepúlveda has developed a strong appreciation for Moca, as its unique cultural charm and enriching experiences greatly appeal to him. He is particularly fascinated by the Museo del Mundillo, a place dedicated to preserving the art of lace-making, which captivates him due to its historical and artistic significance. His curiosity about this intricate technique has led him to explore more about its craftsmanship, considering the museum a valuable cultural experience. Additionally, he enjoys the inviting atmosphere of Natural Life Café, a nearby restaurant where he can relax and have a meal in a comfortable setting. During his stay in Moca, Mr. Sepúlveda also hopes to visit the Banco Popular branch, as it is located near the places he plans to frequent. His interest in Banco Popular is due to its strong reputation, long-standing presence in the financial sector, and the variety of services it offers. Becoming a client allows him to manage his finances more efficiently while in the area, providing greater convenience in his banking transactions. However, although he genuinely wishes to visit the branch, Mr. Sepúlveda is aware that architectural barriers at the location limit accessibility and make mobility difficult. Due to his reduced ability to move around, he knows that these obstacles pose a challenge to entering and navigating the space comfortably. The lack of adequate accessibility dissuades him from going, as he is concerned about encountering difficulties that complicate his experience and prevent him from handling his transactions independently. The barriers are:

- 125.1. Excessively Tall Counter: Mr. Uriel has noticed that the counter at the Banco Popular branch in Moca is too high, making it difficult for him to use comfortably and efficiently. The height of the counter forces him to exert unnecessary effort to complete his banking transactions, making them uncomfortable and complicated. These limitations cause him pain when performing everyday tasks such as handing over documents, receiving cash, or completing other operations, making them more difficult and less effective. Additionally, the uncomfortable posture he must adopt to reach the counter turns what should be a simple banking process into a physically exhausting experience, discouraging him from accessing the bank's services.
- 125.2. Lack of Space Under the Counter: Mr. Uriel is also aware that the counter at the Banco Popular branch in Moca lacks enough open space underneath, preventing him from approaching the service area properly while using his mobility support device. Due to this lack of space, his walker bumps into the counter, further complicating his ability to position himself correctly. The inability to approach the counter properly forces him to maintain an awkward posture, impacting both his stability and comfort during his banking operations. What should be a simple process becomes a frustrating and exhausting experience, further discouraging him from using the bank's services.
- 125.3. The barriers on the property could be eliminated by making structural modifications that allow Mr. Uriel to access and use banking services without physical limitations. Lowering the height of the counter ensures that he can comfortably reach the service area, facilitating his interaction with bank staff and

allowing him to complete his transactions independently. Additionally, providing open space beneath the counter allows Mr. Sepúlveda to properly approach the service area while using his mobility support device, ensuring that he can position himself correctly. These modifications do not require complex infrastructure changes but have a significant impact on his accessibility. By removing these barriers, he no longer feels dissuaded from visiting the branch and is guaranteed full access to the financial services he needs.

Banco Popular's Morovis Branch

126. Mr. Walberto has developed a deep appreciation for Morovis, a town known for its rich culinary offerings and welcoming atmosphere. He is particularly drawn to Molcajete Morovis, a popular restaurant offering a variety of dishes inspired by Mexican cuisine. The opportunity to explore new flavors and enjoy a pleasant dining experience excites him. In addition, he is familiar with other dining establishments in the area that may interest him, further enhancing the appeal of spending time in Morovis. During his visit, Mr. Walberto, a Banco Popular client, prefers to conduct his banking transactions at the Morovis branch due to its convenience and accessibility. His interest in visiting the branch is driven by his trust in the bank and the convenience of managing his finances at a location near places he intends to visit. However, despite his intention to visit the branch, Mr. Walberto is aware that architectural barriers at the location limit accessibility. This inadequate accessibility discourages him from going, as he fears encountering obstacles that complicate his experience and prevent him from accessing banking services independently. The barriers at the branch are:

- 126.1. Inaccessible Counter Height: Mr. Walberto is aware that the counter at the Banco Popular branch in Morovis is excessively high, making it difficult for him to use effectively. The elevated height prevents him from comfortably reaching the service area, creating a significant barrier in his interaction with bank staff. This limitation restricts his ability to hand over documents, receive cash, and complete other transactions without difficulty. Additionally, the counter's design does not accommodate the needs of a person who uses a wheelchair, forcing him into an awkward position and making it difficult for him to access banking services. The lack of a properly adjusted service area places him at a disadvantage, affecting his ability to receive service equitably. This barrier not only limits his independence but also turns what should be a simple banking transaction into a frustrating and physically exhausting experience.
- 126.2. Obstructed Access at the Banking Counter: Mr. Walberto is aware that the counter at the Banco Popular branch in Morovis lacks open space underneath, preventing him from properly approaching the service area while using his wheelchair. The absence of this clearance restricts his ability to position himself correctly, making his interaction with bank staff and the completion of his transactions more difficult. Since he cannot move close enough, he is forced to remain in an uncomfortable position and make unnecessary maneuvers to try to access service, affecting his comfort and making banking transactions unnecessarily complicated. This barrier turns what should be a quick and simple task into a frustrating and exhausting experience, further dissuading him from visiting the branch and receiving the service he needs.

126.3. The barriers on the property could be eliminated by making structural adjustments that allow Mr. Walberto to access and use banking services without unnecessary difficulties. Lowering the height of the counter ensures that he can comfortably reach the service area, allowing him to interact with bank staff without physical obstacles that negatively impact his experience. Additionally, providing open space beneath the counter ensures that he can fully approach the service area while using his wheelchair, preventing him from having to make uncomfortable maneuvers or remain in a restricted position. These modifications do not require complex infrastructure changes but represent an essential improvement to ensure that Mr. Walberto can access banking services comfortably and independently. Removing these barriers prevents him from feeling dissuaded from visiting the branch and allows him to receive the banking services he needs equitably and without obstacles.

Banco Popular's Naguabo Branch

127. Mrs. Bonnelis Cepeda has developed a strong appreciation for Naguabo, a charming coastal town in Puerto Rico known for its rich cultural heritage, stunning natural beauty, and vibrant community. She is particularly drawn to its nearby attractions, such as the Malecón de Naguabo, a scenic waterfront boardwalk perfect for strolling and enjoying the ocean breeze, and Playa Húcares, a popular spot for relaxation and water activities, both conveniently located near the Banco Popular Naguabo Branch. Banco Popular, a recognized and trusted bank of which Mrs. Cepeda is a client, offers essential services like ATM access, teller assistance, and personalized customer support, making it an ideal choice for managing her banking needs during her visit. However, despite her intention in

visiting the branch, since December 2024, Mrs. Bonnelis Cepeda has been aware of the following architectural barriers that have prevented her from entering the branch, discouraging her from accessing the services the bank provides:

- 127.1. Inaccessible High counter: Mrs. Bonnelis Cepeda finds that the service counter at Banco Popular is set too high for her needs. Due to her paralysis in the right arm, she relies solely on her left arm to perform tasks such as signing documents, handling her card, and receiving cash. The excessive height forces her to stretch uncomfortably, which increases the risk of dropping items and causes undue physical strain. This barrier limits her ability to complete routine transactions independently and comfortably. As a result, the discomfort and physical strain discourage her from attempting to access the services the bank provides.
- 127.2. Inaccessible Payment Terminals and Writing Surfaces: Mrs. Bonnelis Cepeda is aware that the payment terminals and writing surfaces at Banco Popular are positioned too high or in fixed locations, making them difficult to access with one functional hand. Since she cannot use her right hand to stabilize documents or operate the payment terminal, she struggles to complete tasks that require holding and signing papers or inserting and retrieving her card. This barrier forces her to find uncomfortable workarounds or request assistance, reducing her autonomy in managing financial transactions. This frustration and difficulty in completing simple tasks dissuade her from visiting the branch.
- 127.3. Lack of an Accessible Section at the Counter: Mrs. Bonnelis Cepeda is aware that Banco Popular's service counter does not include a designated accessible section at an appropriate height. This design forces her to engage with bank staff from an

uncomfortable position, as she cannot adjust her posture easily to accommodate the counter's height. Without a lower counter space, she faces unnecessary physical strain while conducting transactions and must depend on others for assistance, making the banking process inefficient and frustrating. These challenges discourage her from attempting to access the bank's services and make the visit feel burdensome.

- 127.4. To address the accessibility barriers at Naguabo's Branch service counter, the bank can implement two key modifications. First, installing a lower section of the counter or providing adjustable-height workstations allows Mrs. Bonnelis Cepeda to comfortably reach the counter, complete transaction forms, process payments, or discuss account details directly with tellers without physical strain. Second, the bank can reposition the payment terminals and writing surfaces to a more accessible height or incorporate movable platforms that accommodate individuals with limited mobility. This allows Mrs. Bonnelis Cepeda to independently operate the payment terminal, handle her card, and sign documents without requiring assistance.

Banco Popular's Naranjito Branch

128. Mr. Walberto Hernández, a long-standing client of Banco Popular, places his full trust in the institution due to its innovative range of financial services, robust account management, and personalized attention that enables him to address his needs quickly and effectively. On January 21, 2025, motivated by the convenience of the Naranjito branch and eager to enjoy a banking experience tailored to his requirements, he personally visited the branch to conduct his transactions directly. Mr. Hernández uses a

wheelchair due to spina bifida and congenital hydrocephalus—conditions that necessitated back surgery and the placement of a shunt—as well as suffering from kidney damage, epilepsy, high blood pressure, and asthma. These conditions limit his mobility and demand a safe physical environment to avoid excessive fatigue, pain, and unnecessary risks. During his visit, he encountered the following barriers, which immediately impacted his ability to carry out banking transactions without discomfort:

129. Excessive Counter Height without an Adapted Section: Mr. Hernández observed that, despite the modern appearance and the finishes in shades of gray with wooden details, the counters at the branch are set at a height ranging between 49 and 51 inches, with no section below the 36-inch level mandated by the ADA. When attempting to sign documents and interact with staff, he is forced to raise his torso and arms beyond his comfortable range of motion, causing immediate fatigue and a heightened risk of losing stability—a situation aggravated by his spina bifida and the strain on his back.

- 129.1. Absence of a Continuous Accessible Lower Extension on the Counter Surface:

While trying to place his documents and personal items, Mr. Hernández noted that the front portion of the counter lacks a uniformly extended accessible area at the lower level. Instead, there is a protruding signing bar that further hinders access. Given his epilepsy and motor limitations, holding documents aloft while maneuvering around the counter proves uncomfortable and dangerous, increasing his physical exhaustion and exposing him to the risk of dropping important items.

- 129.2. Insufficient Depth Under the Counter for Wheelchair Accommodation: Upon approaching the service area, Mr. Hernández discovered that there is inadequate space beneath the counter to comfortably accommodate his wheelchair. This

forces him to lean in an unnatural manner, increasing the pressure on his back and making it difficult to assume a proper posture for signing or handing over documents. Considering his prior surgeries and the shunt in his head, this situation immediately compromises his health and causes significant discomfort.

130. To comply with the Americans with Disabilities Act (ADA) and ensure the inclusion of users like Mr. Hernández, an integrated intervention is required. This should include installing an accessible section in the counters that does not exceed 36 inches in height and extends uniformly throughout their full depth, thereby allowing him to sign documents and deposit his belongings without undue strain. Additionally, the counter should be redesigned to include a continuous accessible lower extension, eliminating any protruding elements that hinder interaction, and the area beneath the counter should be expanded to provide adequate clearance for his wheelchair. These modifications will enable Mr. Hernández to conduct his banking transactions safely, comfortably, and independently, thereby reinforcing his trust in Banco Popular and ensuring an equitable experience for all clients.

Banco Popular's Orocovis Branch

131. Mr. Walberto Hernandez, a valued client of Banco Popular, has decided to visit Orocovis, a town in central Puerto Rico renowned for its breathtaking mountain views, rich culture, and attractions like the Museo del Café, which showcases the region's coffee heritage. These sites are conveniently located near the Banco Popular Orocovis Branch, making it a perfect stop during his visit. Banco Popular, known for its reliable services, offers key banking options such as personalized customer support, enabling Mr. Hernandez to manage his banking needs with ease. However, since December 2024, Mr. Hernandez, as

a wheelchair user due to spina bifida and hydrocephalus, is aware of several architectural barriers at the branch. These barriers discourage him from visiting, as they make it difficult for him to access the services independently. The barriers are:

- 131.1. High service counter: Mr. Walberto Hernandez is aware that the service counter at Banco Popular is too high, making it challenging for him to reach, inquire about banking services, or engage with the bank staff while using his wheelchair. The excessive height of the counter forces him to stretch in an uncomfortable way, causing physical strain and making it difficult to independently access the banking services. This barrier requires him to rely on others for assistance, reducing his autonomy and creating an unequal experience compared to other customers. As a result, he feels dissuaded from using the branch services.
- 131.2. Insufficient Knee Clearance Under the Counter: Mr. Walberto Hernandez is also aware that the counter at Banco Popular does not provide enough clearance underneath, preventing him from approaching it in a comfortable, direct position while using his wheelchair. This lack of space forces him to adjust his position awkwardly, which complicates his ability to carry out transactions efficiently and comfortably. The difficulty in positioning himself properly not only affects his interaction with the bank staff but also makes it harder for him to manage his banking needs independently. These obstacles further discourage him from visiting the branch.
- 131.3. The barriers at Banco Popular Orocovis Branch can be readily addressed by lowering the service counter to a height that is accessible for individuals using wheelchairs, ensuring it is not higher than 34 inches. Additionally, providing

sufficient knee clearance underneath the counter—at least 27 inches in height, 30 inches in width, and 19 inches in depth—allows Mr. Walberto Hernandez to approach the counter comfortably in a frontal position. These modifications enable him to carry out banking transactions independently, reducing physical strain and ensuring a more dignified and equitable banking experience that encourages him to use the branch services.

Banco Popular's Patillas Branch

132. Mr. Carlos Molina has developed a deep admiration for Patillas, a peaceful town in southeastern Puerto Rico known for its rich agricultural heritage, particularly its coffee production. He appreciates Patillas for its local coffee markets and the opportunity to support small businesses within the community. While in the area, Mr. Molina seeks to rely on the Banco Popular Patillas Branch to manage his financial needs. As a client of Banco Popular, Mr. Carlos Molina holds the bank in high regard, particularly for its convenient services, including ATM access and personalized customer support. However, as someone who depends on a wheelchair due to muscular dystrophy, he fears potential discrimination and barriers that may limit his ability to fully access these services. Since November 2024, he has been aware of certain architectural barriers at the branch that have discouraged him from using its services. These barriers are as follows:

132.1. High Counter. Mr. Carlos Molina is aware that the counter at Banco Popular in Patillas exceeds 36 inches (0.91 m) in height without an accessible lower section, making it difficult for him to comfortably reach it while using his wheelchair. Due to his muscular dystrophy, which limits his upper body mobility, he cannot put his signature on files, handle cash, or communicate with bank personnel without

assistance. This barrier forces him to rely on others for basic banking tasks, discouraging him from visiting the branch independently.

- 132.2. **Insufficient Knee Clearance Under the Counter.** Mr. Carlos Molina is aware that the counter lacks adequate knee clearance, with less than 27 inches of space underneath, preventing him from approaching it frontally while using his wheelchair. This forces him to position himself sideways or stretch uncomfortably to conduct transactions, creating physical strain and making the process inefficient and undignified, which discourage him from accessing the branch.
- 132.3. **Lack of Accessible Signage at the Counter.** Mr. Carlos Molina is aware that the counter at Banco Popular in Patillas lacks accessible signage, such as high-contrast or enlarged text, making it difficult for him to read important information due to his visual impairments caused by oculocutaneous albinism. This barrier complicates his ability to interact with staff, read documents, or complete transactions efficiently, discouraging him from using the branch's services independently.
- 132.4. These barriers can be readily addressed by lowering the counter to a maximum height of 34 inches (86 cm) with an accessible lower section, ensuring Mr. Carlos Molina can comfortably reach it while using his wheelchair. Additionally, providing at least 27 inches (68.5 cm) of knee clearance underneath the counter allows him to approach it frontally without strain. To improve accessibility for his visual impairments, the counter should include high-contrast signage, enlarged text, and assistive tools like magnifiers, enabling him to read documents and interact with staff independently. By implementing these changes, Banco Popular

eliminates the current obstacles, making the branch more welcoming and accessible. This not only enhances Mr. Molina's experience but also motivates him to use the branch confidently during his visits to Patillas.

Banco Popular's Peñuelas Branch

133. Mr. Uriel Sepúlveda has developed a strong interest in visiting Peñuelas, a town in southern Puerto Rico celebrated for its tranquil ambiance and vibrant community. He is particularly drawn to its rich cultural heritage and natural attractions, such as the historic Hacienda Lucía, which offers insights into the region's coffee production history, and Parque El Gentil, known for its scenic hiking trails and breathtaking mountain views. Due to his reliance on a walker, caused by a damaged lumbar disc, bilateral cervical and lumbar radiculopathy, osteoporosis, and chronic osteoarthritis in his spine and sacroiliac joints, he is mindful of accessibility when planning his visits. During these trips, he intends to utilize the Banco Popular Peñuelas Branch to manage his financial needs efficiently, as the bank's reputation for excellent customer service and convenient digital banking tools make it an ideal choice for handling transactions seamlessly. However, since November 2024, he has been aware of certain barriers at the branch that have discouraged him from accessing its services and becoming a client. These barriers are the following:

133.1. Inaccessible High Counter. Mr. Uriel Sepulveda is aware that the counter at Banco Popular in Peñuelas is too high, making it difficult for him to comfortably reach it while using his walker. Due to his chronic osteoarthritis and damaged lumbar disc, which limit his ability to stand for extended periods or stretch upward, he cannot sign documents, or handle cash without assistance. This barrier forces him

to rely on others for basic banking tasks, discouraging him from visiting the branch independently.

133.2. Inadequate Front-Facing Space at Counter. Mr. Uriel Sepulveda has identified a critical issue with the bank counter's design: insufficient space for direct frontal access. This limitation hinders his ability to position himself comfortably while using a walker, a necessity due to his bilateral cervical and lumbar radiculopathy—a condition marked by chronic pain and restricted mobility. As a result, he is compelled to conduct transactions either by contorting his body at an awkward angle or overextending himself, exacerbating physical discomfort. These challenges not only impose undue strain but also transform routine banking into an inefficient and demeaning experience, discouraging him from using the branch's services.

133.3. These barriers can be readily addressed by lowering the counter to a maximum height of 34 inches (86 cm) and ensuring it has adequate space underneath for a frontal approach (at least 27 inches of knee clearance). This allows Mr. Uriel Sepúlveda to comfortably reach the counter and position himself properly while using his walker, reducing physical strain and enabling him to conduct transactions independently. By making these modifications, the Banco Popular Peñuelas Branch becomes a more welcoming space, motivating him to use its services during his visits to the town.

Banco Popular's Ponce Branches

134. Mr. Uriel has been eager to join Banco Popular as a client for some time, particularly due to the appeal of the Ponce El Monte Branch. As a resident of Ponce, he feels a deep

connection to the area, especially the Monte Town Center, which holds cherished memories from his childhood. The branch's location in this familiar, comforting environment makes it an ideal place for him to handle his banking needs with ease and confidence. Nevertheless, since October 2024, he has refrained from visiting the branch because of certain architectural barriers that concern him. Given his health condition, he fears that these obstacles could make his visit uncomfortable or, worse, feel discriminatory. The barriers Mr. Uriel has noticed are as follows:

- 134.1. Excessive Height of the Counter: Mr. Uriel is aware that the counter at the Branch Ponce El Monte is set too high for him to access comfortably. Because of this, he has been discouraged from visiting the branch altogether. He uses a walker, and cannot approach the counter directly, which forces him to lean or twist his body awkwardly, causing increased pain in his lumbar area due to his damaged disc and radiculopathy. This physical discomfort disrupts the efficiency of his interactions. Instead of being able to complete his tasks smoothly, Mr. Uriel finds himself struggling to reach over or around the counter, which slows down his process and leaves him feeling frustrated and dependent on others.
- 134.2. Limited Space at Counter: Mr. Uriel feels dissuaded from visiting the Branch Ponce El Monte because he recognizes that the counter lacks sufficient space for him to approach it directly with his walker. This absence of adequate space presents a considerable obstacle, as his health conditions, including bilateral cervical and lumbar radiculopathy and chronic osteoarthritis, make it difficult for him to maneuver the walker with the necessary ease and flexibility. Instead of being able to complete his transactions effortlessly, Mr. Uriel is forced to make

uncomfortable adjustments, which not only slows down the process but also creates physical discomfort.

134.3. To resolve the issue of the high counter at the Branch Ponce El Monte, the counter height could be adjusted to be accessible for Mr. Uriel, ensuring compliance with accessibility standards. This involves creating a designated space that allows Mr. Uriel to approach comfortably with his walker, enabling him to do transfers without needing to lean or make uncomfortable movements that cause pain. To resolve the counter access barrier at the Branch Ponce El Monte, it is essential to widen the area's depth, ensuring there is enough space for him to maneuver his walker without obstacles.

134.4. If these barriers are addressed, Mr. Uriel feels much more comfortable and independent when handling his banking tasks, making it easier for him to visit the branch regularly. By eliminating this limitation, he is able to access the services of Banco Popular without relying on assistance from others, motivating him to become a bank customer and take advantage of all the benefits it offers.

135. Mr. Uriel wants to visit the Branch Ponce Rambla because its location is close to his home and it is within a shopping center that also houses his favorite restaurant, which serves the oriental food he enjoys the most. Nevertheless, despite his interest in visiting the Branch Ponce Rambla, Mr. Uriel has been discouraged from going there since November 2024 due to the architectural barriers at the branch, which have made him feel uncomfortable and concerned about the difficulty he might face in completing his banking tasks independently.

- 135.1. Obstacles in Accessing the Counter: Mr. Uriel has noticed that the height of the counter at the Branch Ponce Rambla presents significant challenges for him. Due to his medical conditions, including osteoporosis, chronic osteoarthritis in his spine, and damage to his lumbar discs, reaching the counter becomes a painful task. The counter's elevated position forces him to stretch or twist in uncomfortable ways, intensifying his pain. This difficulty in accessing the counter prevents him from completing his banking activities independently, diminishing his sense of autonomy and discouraging him from visiting the branch.
- 135.2. Limited Space for Easy Approach: At the Branch Ponce El Monte, Mr. Uriel has observed that the counter lacks enough space in front of it, making it impossible for him to comfortably approach it with his walker. The restricted space, combined with his health conditions—bilateral cervical and lumbar radiculopathy along with chronic osteoarthritis—adds to the challenge of maneuvering his walker. He has no choice but to place himself in awkward positions, leading to a slow and uncomfortable interaction with the bank staff. These physical barriers make the process inefficient and unpleasant, leading him to avoid the branch altogether.
- 135.3. To make the Banco Popular branch more accessible for Mr. Uriel, it is essential to adjust the height of the counter to a level that is comfortable and manageable for him to reach while using his walker. The counter should be lowered to a height no higher than 36 inches, enabling Mr. Uriel to approach and interact with it without strain or pain. This change significantly improves his ability to conduct his banking tasks independently, restoring his sense of autonomy. Furthermore,

addressing the lack of space in front of the counter is crucial. Expanding the depth of the area in front of the counter provides the necessary space for Mr. Uriel to approach directly with his walker, without having to maneuver in awkward positions. This adjustment eliminates any discomfort and allows for a smoother, more efficient banking experience. By making these adjustments, the bank enhances accessibility, ensuring that Mr. Uriel can visit the branch with ease and dignity, and conduct his transactions without unnecessary obstacles.

136. In order to become a client, Mr. Uriel is interested in visiting the Branch Centro del Sur Mall, as it is located just a short drive, less than ten minutes, from his home. Additionally, the Centro del Sur Mall houses well-known stores such as Mega Marshall's and Burlington Coat Factory, and restaurants like Charlie's Pizza, which, according to him, offers the best pizza. This makes it easy and convenient for him to handle his banking tasks at that location. However, since November 2024, Mr. Uriel has been aware of the architectural barriers at the branch, which has dissuaded him from going there:

- 136.1. Inaccessible Counter Height: Mr. Uriel knows that the counter at the Centro del Sur Mall branch is set at a height that makes it difficult for him to access, as he uses a walker for mobility. Due to his osteoporosis and chronic osteoarthritis in his spine, he struggles to comfortably reach the counter, causing him pain and discomfort. This makes it challenging for him to maintain his balance and perform his banking tasks independently. As a result, this barrier prevents him from visiting the branch.
- 136.2. Inadequate Space for Direct Access: Mr. Uriel is aware that at the Centro del Sur Mall branch, the counter lacks the necessary depth to allow him to approach it

directly with his walker. This restriction forces him to maneuver around the counter in a way that is difficult and uncomfortable, especially considering his lumbar disc issues and radiculopathy. The physical strain caused by adjusting his position leads to pain and instability, making it challenging for him to complete his banking tasks independently. As a result, this lack of space discourages him from visiting the branch.

136.3. To address the barriers at the Centro del Sur Mall branch, the height of the counter should be lowered to an accessible level, no higher than 36 inches (86 cm). This adjustment allows Mr. Uriel to reach the counter comfortably without straining, reducing the pain and discomfort caused by his condition. Additionally, creating sufficient depth at the counter is essential to ensure Mr. Uriel can approach it directly with his walker. Expanding the space in front of the counter enables him to position himself comfortably without the need for awkward adjustments, reducing physical strain and improving his stability. These changes empower him to perform his banking tasks independently, making the branch more accessible and encouraging him to visit it with confidence.

137. Mr. Uriel is interested in visiting the Branch Plaza del Caribe, as it is located in a shopping center less than 10 minutes by car from his home. The area has a variety of stores, allowing him to take care of his banking needs while enjoying a family outing, shopping, and especially visiting Invicta, as he is a big fan of watches; give him the opportunity to relax, spend time with his loved ones, and complete any banking transactions he requires. However, despite his desire to become a client and visit the branch, since December 2024, he has been discouraged from doing so because he is

aware of architectural barriers at the site that could affect his visit, making him feel discriminated against and limited due to his disability. These barriers include:

- 137.1. High Transaction and Customer Service Counter: Mr. Uriel is also aware that the counter at the Branch Plaza del Caribe is set at a height that makes it inaccessible to him due to his osteoporosis and osteoarthritis in his spine. Reaching it causes discomfort and pain, making it difficult for him to carry out banking tasks independently. This difficulty forces him to rely on external assistance, which makes him uncomfortable and discourages him from visiting that branch.
- 137.2. Transaction and Customer Service Counter Without Sufficient Depth: Mr. Uriel is aware that the counter does not have enough space for him to approach with his walker. This prevents him from positioning himself properly in front of the counter, forcing him to adopt uncomfortable postures to perform activities such as handing over documents or signing papers. Due to his back issues, such as damage to his lumbar disc and radiculopathy in the cervical and lumbar areas, any effort to lean forward causes him pain and makes it difficult to maintain balance, which leads him to feel discouraged from visiting the branch.
- 137.3. To address the barriers at the Plaza del Caribe branch, the height of the counter should be adjusted to an accessible level for Mr. Uriel, who uses a walker. This modification allows him to hand over documents, receive money, and conduct transactions independently, ensuring the branch provides adequate access and promotes a more inclusive service. Furthermore, the lack of depth at the counter can be resolved by expanding its design to provide enough space for Mr. Uriel to approach comfortably with his walker. This enables him to position himself

correctly in front of the counter and eliminates the need to lean forward to carry out tasks such as signing documents or handing over his identification. If these changes are made, Mr. Uriel can experience greater comfort and independence in managing his banking tasks, accessing Banco Popular's services without relying on others for assistance, and can become a customer, taking full advantage of the benefits the bank offers.

138. Driven by his interest in Banco Popular de Puerto Rico, Mr. Uriel Sepúlveda wishes to access the Ponce Plaza branch, which is conveniently located in front of Plaza Pública de Ponce Federico Degetau. He appreciates this area for its welcoming and beautiful environment, where he frequently spends time reflecting. Additionally, the surrounding establishments offer products he enjoys, including restaurants and ice cream shops with delicious treats, such as King's Cream. Since October 2024, he has been aware of several architectural barriers at this branch that make access difficult. Due to his health condition and reliance on a walker for mobility, he knows he faces obstacles that create inequality in accessing the bank's services compared to individuals without disabilities. As a result, he feels discouraged from going to the branch. Mr. Uriel Sepúlveda is aware of the following architectural barriers at the Banco Popular de Puerto Rico – Ponce Plaza branch:

- 138.1. Extremely Tall Transaction And Customer Service Counters: Mr. Uriel Sepúlveda is aware that the transaction and customer service counters at the branch are extremely tall, making them difficult for him to use effectively. Due to his osteoporosis and chronic osteoarthritis in his spine, along with his reliance on a walker for mobility, he struggles to maintain balance while standing at the

counter. The height of the counter forces him to overreach, which causes discomfort and increases his risk of losing stability. As a result, his access to services is limited. This ongoing difficulty discourages him from going to the branch.

138.2. Transaction And Customer Service Counters Without Depth: Mr. Uriel is aware that the transaction and customer service counters do not have sufficient depth to allow him to approach them frontally with his walker. This lack of space prevents him from positioning himself properly in front of the counter, forcing him to lean uncomfortably forward to sign documents, hand over his identification, or receive items. Due to his damaged lumbar disc and bilateral cervical and lumbar radiculopathy, any additional effort to lean forward causes him pain and makes it difficult to maintain stability. As a result, this barrier makes completing his transactions uncomfortable and physically challenging. This situation makes him feel discouraged from going to the branch

138.3. To make Branch Ponce Plaza more accessible for Mr. Uriel, several adjustments to the transaction and customer service counters are needed. Firstly, lowering the counter to a height that allows Mr. Uriel to comfortably interact with bank staff and complete his transactions independently is a significant improvement. The current counter height makes it difficult for him to reach, creating unnecessary discomfort and requiring assistance from others. In addition to adjusting the counter height, increasing the depth of the counter provides Mr. Uriel with enough space to approach directly with his walker. This enables him to sign documents, provide identification, and handle materials with ease, without the need for

awkward positioning or physical strain. These changes allow Mr. Uriel to complete his banking tasks independently, without the need for assistance, making his visits to the branch more convenient and accessible.

139. Mr. Uriel Sepúlveda loves spending time at Ponce Towne Center Sur Shopping Mall, a place he appreciates for its variety of clothing stores and restaurants with delicious food, such as Subway and New York Buffet. Within this shopping center, the Banco Popular de Puerto Rico branch at Ponce Towne Center Sur is a convenient location for him to manage his banking needs. Since October 2024, he has been aware of several architectural barriers at this branch that make access difficult. Due to his health condition and reliance on a walker for mobility, he knows he faces obstacles that prevent him from accessing the bank's services on equal terms. As a result, he feels discouraged from visiting the branch. Mr. Uriel Sepúlveda is aware of the following architectural barriers at the Banco Popular de Puerto Rico – Ponce Towne Center Sur branch:

- 139.1. Extremely Tall Transaction And Customer Service Counters: Mr. Uriel Sepúlveda is aware that the transaction and customer service counters at the Banco Popular de Puerto Rico branch in Ponce Towne Center Sur are too tall for him to use comfortably. As someone who relies on a walker for mobility and stability, he struggles to maintain balance while reaching for the counter. His osteoporosis and chronic osteoarthritis in his spine make it difficult for him to extend his arms without experiencing pain and stiffness, further complicating his ability to complete transactions. This barrier prevents him from safely handing over documents or receiving cash without pain, making the process physically

demanding. These challenges make him feel discouraged from going to the branch and becoming a Banco Popular client.

139.2. Transaction And Customer Service Counters Without Depth: Mr. Uriel is aware that the transaction and customer service counters at Branch Ponce Towne Center Sur do not have sufficient depth to allow him to approach them frontally with his walker. This lack of space prevents him from properly aligning himself with the counter, forcing him to lean uncomfortably forward to sign documents, hand over his identification, or receive items. Due to his damaged lumbar disc and bilateral cervical and lumbar radiculopathy, any additional effort to lean forward causes him pain and makes it difficult to maintain stability. As a result, this barrier prevents him from completing his transactions comfortably and safely. For these reasons, he feels deterred from going to the branch.

139.3. The barriers at Branch Ponce Towne Center Sur could be eliminated by modifying the transaction and customer service counters to comply with ADA accessibility standards. This includes lowering the counters to a height that allows individuals using walkers to comfortably interact with staff, hand over documents, receive cash, and complete transactions independently. Additionally, increasing the depth of the counters enables Mr. Uriel to properly align himself in front of them, allowing him to sign documents, provide identification, and receive materials without unnecessary physical strain. These modifications eliminate the need for third-party assistance, ensuring that individuals with mobility impairments, like Mr. Uriel, can access services comfortably and independently, fostering a more inclusive and accessible environment.

Banco Popular's Quebradillas Branch

140. Mr. Walberto Hernández, a client of Banco Popular, values the institution for its reliability and the personalized services it offers. He wishes to access its branches, especially the one in Quebradillas, as he appreciates the area for its scenic beauty and cultural significance, which makes each visit even more meaningful to him. The opportunity to conduct his banking transactions while enjoying landmarks like the Mirador Guajataca and the Puente La Bellaca makes the Quebradillas branch an ideal destination. However, despite his genuine desire to visit this branch, he feels discouraged from doing so due to multiple accessibility barriers that directly affect his ability to enter, move around, and receive services on equal terms. Due to his health condition, which requires the use of a wheelchair, and additional medical issues such as kidney damage, epilepsy, high blood pressure, and asthma, the architectural barriers at the branch make it difficult for him to access and discourage him from conducting transactions independently. The barriers that dissuade him from accessing the branch are as follows:
141. Service Counter is Too High, Preventing Proper Assistance: Mr. Walberto Hernández is aware that the customer service counter at the Quebradillas branch is too high, preventing him from reaching the surface from his wheelchair. Due to his limited range of motion, he cannot lift his arms high enough to sign documents or handle cash without great effort and discomfort. This barrier forces him to rely on bank personnel for basic transactions, compromising his privacy and independence in managing his finances. He feels dissuaded from visiting this branch because he cannot interact with bank services on equal terms.

- 141.1. Lack of a Functional Surface for Placing Documents: Mr. Walberto Hernández is aware that the service area lacks an accessible surface where he can securely place his documents. As a result, he is forced to hold them uncomfortably in his lap or in the air, increasing the risk of losing important paperwork and making it difficult to manage his money. His spina bifida and hydrocephalus affect his ability to perform precise and sustained movements, making this barrier a direct impediment to his security and efficiency in banking transactions. He feels dissuaded from visiting the branch because this deficiency prevents him from conducting his financial tasks practically and independently.
- 141.2. Restricted Access in Front of the Counter: Mr. Walberto Hernández is aware that the space in front of the service counter does not allow his wheelchair to properly position for assistance, as the layout lacks the necessary depth for him to approach without obstruction. This barrier forces him to remain in an uncomfortable and distant position, affecting his ability to communicate effectively with bank personnel. His high blood pressure and asthma make the additional effort of maneuvering in a restricted space cause immediate fatigue and discomfort. He feels dissuaded from visiting this branch because he knows he faces constant challenges in accessing basic services.
- 141.3. The accessibility barriers identified at the Banco Popular branch in Quebradillas can be eliminated through structural modifications that allow customers with disabilities to receive services on equal terms. To ensure accessibility, the service counter must be modified to include a section at a height of 36 inches or less, allowing Mr. Walberto Hernández to comfortably and easily reach the surface.

Additionally, an accessible functional surface must be installed where he can securely place his documents and belongings while conducting transactions. Furthermore, the space in front of the counter must be reconfigured to ensure adequate depth for a wheelchair to position without restrictions. Once these solutions are implemented, Mr. Walberto Hernández can visit the Banco Popular branch in Quebradillas and manage his banking transactions independently, accessibly, and without barriers.

Banco Popular's Rincon Branch

142. Mr. Uriel Sepulveda intends to visit Rincón, a town in western Puerto Rico, drawn by its reputation for stunning coastal views and rich cultural appeal. He is particularly interested in exploring the Faro de Punta Higüera, a historic landmark known for its panoramic ocean vistas and breathtaking sunsets. As someone who values scenic beauty and historical significance, he finds the opportunity to witness the famous Rincón sunsets and, if visiting during the winter months, observe migrating humpback whales especially compelling. Given his mobility limitations due to a damaged lumbar disc, bilateral cervical and lumbar radiculopathy, osteoporosis, and chronic osteoarthritis, he carefully selects destinations that offer both accessibility and an enriching experience. During these visits, the Banco Popular Rincón branch serves as a convenient option for managing financial matters related to his personal expenses, such as dining at local restaurants, purchasing souvenirs, or covering transportation costs. He has considered becoming a client of Banco Popular due to its strong reputation for customer service, a wide range of financial products, and digital banking tools that enable him to manage his finances efficiently. However, since November 2024, he has been aware of certain barriers at the

branch that have discouraged him from accessing its services and ultimately from opening an account. These barriers are the following:

- 142.1. Inaccessible high counter. Mr. Uriel Sepulveda experiences significant difficulty using the counter at Banco Popular in Rincón due to its excessive height. While relying on his walker, he struggles to reach the surface comfortably, making tasks like signing documents, or handling cash nearly impossible without assistance. His chronic osteoarthritis and damaged lumbar disc limit his ability to stand for long periods or extend his reach, forcing him to depend on others for routine transactions—a frustrating and discouraging experience.
- 142.2. Lack of Frontal Approach Space. Mr. Uriel Sepulveda is aware that the counter does not provide enough space for a frontal approach, preventing him from positioning himself comfortably while using his walker. His limited mobility, caused by chronic pain and physical restrictions, forces him to stand at an awkward angle or stretch in uncomfortable ways to complete transactions. This lack of adequate space results in physical strain and makes the banking process inefficient and undignified, discouraging him from using the branch's services.
- 142.3. These obstacles can be resolved by reducing the counter height to no more than 34 inches (86 cm) and providing sufficient clearance underneath for a forward-facing approach (at least 27 inches of legroom). This adjustment enables Mr. Sepúlveda to access the counter comfortably and position himself correctly while using his walker, minimizing physical discomfort and allowing him to carry out transactions independently. Such modifications foster a more accessible and

respectful banking environment for Mr. Sepúlveda, inviting him to become a client and use Banco Popular's services.

Banco Popular's Rio Grande Branch

143. Mrs. Bonnelis Cepeda, a Banco Popular client, considers using the **Plaza del Yunque** branch as she explores real estate investment opportunities near the El Yunque rainforest. Its proximity to potential properties and extended Saturday hours (8:00am–12:00pm) make it an ideal choice for managing financial transactions related to her future investments, such as property purchases or contractor payments. However, since November 2024, she has been aware of certain barriers at the branch that have discouraged her from accessing its services. These barriers are the following:

- 143.1. Excessive Counter Height. Mrs. Bonnelis Cepeda is aware that **Plaza del Yunque** branch's service counter lacks a section adapted to meet the needs of her physical limitations. Due to the paralysis in her right arm, she relies entirely on her left hand for all tasks. However, the counter's height force her into an uncomfortable and strained position, as she cannot adjust her posture to compensate for the lack of mobility in her right arm. This not only causes physical discomfort but also increases her reliance on others for assistance, leading to frustration and inefficiency, making her reluctant to use the branch's services.
- 143.2. Inaccessible Payment Terminals and Writing Spaces. Another obstacle Mrs. Bonelis Cepeda is aware of, is the placement of payment terminals and writing surfaces, which are either too high or fixed in place. With only one functional hand, she struggles to stabilize papers or operate the payment terminal, complicating tasks such as inserting her card, signing documents, or managing

paperwork. This often leaves her with no choice but to seek assistance or assume uncomfortable postures, further eroding her sense of autonomy when handling financial matters.

143.3. To address these challenges, Banco Popular could implement practical and effective changes. For instance, installing a lower section of the counter or incorporating adjustable-height workstations would allow Mrs. Bonelis Cepeda to interact with staff comfortably and without unnecessary physical strain. Additionally, repositioning payment terminals and writing surfaces to a more accessible height or making them movable would enable her to perform transactions independently, despite the paralysis in her right arm. These adjustments would remove the current barriers, creating a more inclusive banking experience and encouraging her to go to the branch.

144. Similarly, Mrs. Cepeda is interested in the **Río Grande Pueblo** branch (Villas de Rio Grande Shopping Center) for her real estate ventures in the town center. Its central location and weekday hours (8:00am–4:00pm) provides her with convenient access to banking services once she begins managing properties in the area. However, since November 2024, she has been aware of certain barriers at the branch that have discouraged her from accessing its services. These barriers are the following:

144.1. High Counter Design. Mrs. Bonnelis Cepeda has noticed that the height of the service counter at Banco Popular is impractical for her needs. Because of the paralysis in her right arm, she depends solely on her left hand to perform all tasks. However, the height of the counter forces her into an awkward and uncomfortable position, as she is unable to adjust her posture to accommodate the lack of

movement in her right arm. This creates physical discomfort and increases her dependence on others for help, resulting in frustration and inefficiency. Due to these architectural barriers, she feels discouraged from visiting the branch as it is difficult for her to access comfortably.

144.2. **Difficult-to-Reach Payment Terminals and Writing Areas.** At Banco Popular, Mrs. Bonelis Cepeda finds that the payment terminals and writing surfaces are set too high or are immobile, presenting significant obstacles for someone with only one functional hand. Since her right hand cannot be used to stabilize papers or operate the payment terminal, she faces difficulties when performing tasks such as inserting her card, signing documents, or handling paperwork. As a result, she is often forced to either ask for assistance or adopt uncomfortable positions, further diminishing her independence in managing financial matters.

144.3. For instance, installing a lower section of the counter or incorporating adjustable-height workstations allows Mrs. Bonelis Cepeda to interact with staff comfortably and without unnecessary physical strain. Additionally, repositioning payment terminals and writing surfaces to a more accessible height or making them movable enables her to perform transactions independently, despite the paralysis in her right arm. These adjustments remove the current barriers, creating a more inclusive banking experience and encouraging her to visit the branch.

Banco Popular's Sabana Grande Branch

145. Mr. Uriel Sepulveda has decided to go to Sabana Grande due to its expanding commercial activity and strategic location, which he sees as beneficial for fostering professional connections and exploring potential business opportunities. The town's

development, along with its accessibility to key services, makes it a practical destination for his financial and logistical needs. During his trips, he desires and finds it convenient to visit the Banco Popular Sabana Grande branch , where he hopes to become a client to manage his banking needs efficiently. Banco Popular, it's known for offering the comprehensive financial services he requires for both personal and business matters. Given his physical conditions, including a damaged lumbar disc and chronic osteoarthritis, he prioritizes accessible locations, and the Sabana Grande branch initially appeared to meet his needs. However, since December 2024, he has become aware of the following barriers that discourage him from visiting and becoming a client of Banco Popular:

- 145.1. High Counter. Mr. Uriel Sepulveda is aware that the counter at Banco Popular in Sabana Grande is positioned at an inaccessible height, making it challenging for him to interact with it while using his walker. His chronic osteoarthritis and damaged lumbar disc restrict his ability to stand for long periods or reach upward, leaving him unable to fill out documents, handle cash, without help. This limitation forces him to depend on others for basic banking needs, making his visits to the branch less convenient and discouraging him from going independently.
- 145.2. Insufficient Space for a Frontal Approach. Mr. Uriel Sepulveda is aware that the counter does not provide enough space for him to approach it directly while using his walker. His bilateral cervical and lumbar radiculopathy, which causes pain and limits his movement, forces him to position himself at an awkward angle or stretch uncomfortably to complete transactions. This lack of proper space creates

physical discomfort and makes the banking process feel inefficient and undignified, further discouraging him from using the branch's services.

- 145.3. To address these barriers, the counter should be lowered to a maximum height of 34 inches (86 cm) and designed with sufficient knee clearance (at least 27 inches) to allow a frontal approach. These modifications enable Mr. Sepúlveda to comfortably access the counter and conduct transactions independently while using his walker, reducing physical strain and fostering a more inclusive and respectful banking environment.

Banco Popular's Salinas Branch

146. Mr. Carlos Molina, is particularly drawn to Salinas due to his fascination with its culinary heritage, especially its famous mojo isleño, a savory tomato-based sauce that originated in the town over 80 years ago and remains a local delicacy. As someone who enjoys exploring cultural traditions, he is eager to visit Salinas to experience its vibrant food scene, including its renowned seafood restaurants and the annual Festival del Mojo Isleño, which celebrates the town's gastronomic legacy. While he does not reside in the region, Mr. Molina intends to manage his financial transactions at Banco Popular's Salinas branch during his visits. However, since November 2024, he has been aware of certain barriers at the branch that have discouraged him from accessing its services. These barriers are the following:

- 146.1. Excessive Counter Height Barrier. Mr. Carlos Molina is aware that the service counter at Banco Popular exceeds 36 inches in height, making it difficult for him to comfortably reach, sign documents, or interact with bank staff while seated in his wheelchair. Due to his muscular dystrophy and reliance on a wheelchair for

mobility, the excessive height forces him to stretch awkwardly, causing physical strain and discomfort. This barrier limits his ability and discourages him to independently access banking services, as he cannot perform basic transactions without assistance or significant effort.

- 146.2. Lack of Knee Clearance Barrier. Mr. Carlos Molina is aware that the service counter lacks sufficient knee clearance underneath, with less than 27 inches of space, preventing him from approaching it in a frontal position while using his wheelchair. Due to his limited mobility, he is forced to position himself sideways or at an uncomfortable angle to conduct transactions. This awkward positioning not only causes physical strain but also makes it difficult for him to interact with bank staff efficiently and with dignity, creating unnecessary frustration during his banking experience, making him reluctant to use the branch's services.
- 146.3. Lack of Accessible Signage at the Counter Barrier. Mr. Carlos Molina is aware that the service counter lacks high-contrast or enlarged signage, making it difficult for him to read important information displayed on forms, screens, or documents due to his visual impairment caused by oculocutaneous albinism. This barrier forces him to rely on assistance from bank staff or others to understand details, limiting his ability to conduct transactions independently and efficiently. The absence of accessible signage at the counter creates unnecessary challenges that discourage him, as he struggles to navigate the information needed to complete his banking tasks.
- 146.4. To address Excessive Counter Height, the counter should be lowered to a maximum height of 34 inches (86 cm), allowing Mr. Carlos Molina to

comfortably reach and interact with bank staff while seated in his wheelchair. For the Lack of Knee Clearance, the counter must provide at least 27 inches of space underneath to enable a frontal approach, eliminating the need for awkward positioning and reducing physical strain. Additionally, to resolve the Lack of Accessible Signage, the counter should incorporate high-contrast, enlarged signage and digital displays with adjustable text sizes, ensuring Mr. Molina can read information independently. These changes create a more inclusive and dignified banking experience, encouraging him to use the branch services.

Banco Popular's San Germán Branch

147. Mr. Uriel Sepúlveda has a strong interest in visiting San Germán, a historic town in southwestern Puerto Rico known for its cultural heritage and community-driven initiatives. Drawn by its reputation for social entrepreneurship, he is particularly interested in Caras de Rosario, a social enterprise that promotes heritage tourism while empowering local youth and fostering community development. Aligned with his passion for social impact and sustainability, he looks forward to exploring these initiatives and contributing to their growth. During his visits, he relies on the Banco Popular San Germán Branch to efficiently manage his financial needs, appreciating its strong customer service, diverse financial products, and convenient digital banking tools. However, since November 2024, he has been aware of the following barriers that discourage him from becoming a client:

147.1. High Counter. Mr. Uriel Sepulveda is aware that the counter at Banco Popular in San German branch is positioned at a level that is challenging for him to access while using his walker. His chronic osteoarthritis and a compromised lumbar disc

restrict his ability to stand or extend his arms for prolonged periods, making it difficult for him to sign papers or manage cash without help. This limitation compels him to depend on others for routine banking activities, reducing the convenience of his visits and deterring him from handling transactions independently.

- 147.2. No Space for a Direct Approach. Mr. Uriel Sepúlveda is also aware that the counter lacks sufficient space for him to approach it directly while using his walker. His bilateral cervical and lumbar radiculopathy, which causes pain and limits his mobility, forces him to assume awkward positions or overextend himself to perform basic tasks. The insufficient legroom causes physical strain and makes the banking experience feel frustrating and impersonal, further reducing his willingness to engage with the branch's services.
- 147.3. These barriers can be readily addressed by reducing the counter's height to no more than 34 inches and ensuring there is ample clearance underneath—approximately 27 inches for knee space—allowing Mr. Sepúlveda to approach the service area comfortably while using his walker. This modification helps him maintain proper posture, alleviates undue physical strain, and enables him to complete transactions independently. Ultimately, these adjustments foster a more accessible and respectful banking environment for Mr. Sepúlveda, motivating him to become a client and confidently use the branch's services during his visits.

Banco Popular's San Juan Branches

148. Ms. Mirta Colón, resident in San Juan, is a frequent client of Banco Popular, as she trusts in the entity's stability and the variety of financial services it offers. For her, having a bank that allows her to manage her finances efficiently and securely is essential, which is why she regularly uses its services. Given that she has conducted multiple banking transactions with Banco Popular, Ms. Colón is interested in visiting the Caparra Center branch to carry out her transactions and receive personalized assistance. However, since November 2024, although she wants to visit the branch, she is aware of the existence of architectural barriers that directly affect her, as her mobility depends on the assistance of a device, and represent a significant obstacle to her mobility and overall experience at the location, which is why she feels dissuaded from visiting. The barriers that Mrs. Colón is aware of are:

148.1. Extremely Tall Transaction and Customer Service Counter: Mrs. Mirta Colón, who uses a scooter, is aware that the transaction and customer service counter at the Caparra Center branch is excessively high, making it difficult for her to use effectively. The height of the counter prevents her from positioning herself comfortably and reaching the service area without effort, creating a significant barrier to interacting with staff and managing her banking transactions. This limitation restricts her ability to hand over documents, receive cash, or complete transactions without difficulty. Additionally, the lack of an accessible counter forces her to rely on third-party assistance for tasks she could otherwise manage independently in an accessible environment. As a result, her experience at the

branch becomes unnecessarily frustrating and physically demanding, discouraging her from visiting the branch altogether.

148.2. Counter Without Clearance: Mrs. Mirta Colón is aware that the counter at the Caparra Center branch lacks open space beneath it, preventing her from properly approaching the service area. Since she relies on a scooter for mobility, the absence of clearance under the counter makes it impossible for her to position herself correctly, complicating communication with staff and the completion of her transactions. This barrier forces her into uncomfortable postures or requires her to depend on external assistance for banking tasks she should be able to complete independently. The lack of accessibility at this service point not only compromises her comfort and safety but also limits her autonomy, turning a routine task into an unnecessarily complicated and exhausting process. As a result, she feels discouraged from visiting the branch, as the experience is both inconvenient and frustrating.

148.3. The barriers at the Caparra Center Branch could be eliminated by making structural modifications that ensure Mrs. Mirta Colón can access and use banking services comfortably and independently. Lowering the height of the transaction and customer service counter allows her to position herself correctly and reach the service area without difficulty, facilitating her interaction with bank staff and preventing her from having to rely on third parties for tasks she should be able to complete on her own. Additionally, providing open space beneath the counter ensures that she can properly approach the service area while using her scooter. The absence of this adjustment forces her into uncomfortable positions or requires

her to depend on external assistance to complete her transactions, restricting her autonomy and making it harder for her to access banking services. As a result, she feels discouraged from visiting the branch. Implementing these modifications not only significantly improves accessibility within the branch but also ensures that Mrs. Colón's banking experience is not hindered by unnecessary physical barriers.

149. Ms. Mirta Colón regularly visits the Mall of San Juan, as she finds it a convenient place to shop, enjoy her leisure time, and access a variety of services all in one location. Since she frequently visits this area and values the practicality of handling multiple errands in a single place, she is interested in going to the Mall of San Juan branch, where she believes she could manage her transactions efficiently and more comfortably. However, since October 2024, Ms. Colón is aware that there are architectural barriers at the establishment that directly affect her mobility, posing a significant obstacle for her. Since she relies on a mobility device and has other conditions that limit her ease of movement, these barriers make accessing and remaining in the location difficult. The certainty of facing these challenges makes her feel dissuaded from visiting the branch, as it does not guarantee a comfortable and obstacle-free experience when conducting her banking transactions. The barriers that Mrs. Colón is aware of are:

- 149.1. Extremely Tall Transaction and Customer Service Counter: Ms. Mirta Colón is aware that the transaction and customer service counter at the Mall of San Juan branch is excessively high, making it difficult for her to use effectively. The counter creates a barrier that complicates her interaction with staff and limits equal access to banking services. This limitation prevents her from positioning herself correctly to complete transactions comfortably and independently. As a

result, she stretches uncomfortably or relies on third-party assistance for tasks that, in an accessible environment, she manages without difficulty. The lack of a counter at an appropriate height restricts her autonomy and turns her experience at the branch into a frustrating and physically demanding process, discouraging her from visiting the branch.

- 149.2. Counter Without Clearance: Ms. Mirta Colón notices that the counter at the Mall of San Juan branch does not have open space underneath, making it impossible for her to get close to the service area. Without this clearance, she cannot position herself comfortably, which makes her frontal access difficult and inconvenient. The inaccessibility of this service point not only limits her autonomy but also makes a simple banking task unnecessarily difficult and exhausting, further discouraging her from going to the branch.
- 149.3. The barriers on the property can be eliminated by implementing structural adjustments that enable Ms. Mirta Colón to access banking services without unnecessary obstacles. Modifying the height of the transaction and customer service counter allows her to reach the service area with ease, ensuring she completes her transactions independently without relying on third-party assistance. Furthermore, creating adequate clearance beneath the counter allows her to position herself correctly while using her scooter, improving her access and making her banking experience more functional. Without this adjustment, she is forced into uncomfortable positions or requires assistance for tasks she should be able to manage on her own. These essential modifications promote inclusivity and

ensure that her ability to conduct financial transactions is not compromised by avoidable architectural barriers.

150. Ms. Mirta Colón often visits the Avenida 65 de Infantería area, whether to stop by the Centro Comercial 65 de Infantería or to visit McDonald's San Agustín, one of her favorite places. Since this area is part of her usual routine, she is interested in visiting the Ave. de 65 Infanteria Shopping Center branch, as it allows her to take care of her banking transactions conveniently while handling other errands in the same area. However, since October 2024, Ms. Colón is aware that there are architectural barriers at the establishment that hinder her mobility, making it difficult for her to move around the branch freely. Since her ability to move is reduced, these obstacles present an impediment that affects her access and ability to remain in the location. The presence of these barriers makes her feel dissuaded from visiting.

151. The barriers that Mrs. Colon is aware of are:

151.1. Inaccessible Transaction and Customer Service Counter: Mrs. Mirta Colón experiences significant difficulty using the transaction and customer service counter at the Ave. de 65 Infantería Shopping Center branch due to its inadequate height. The counter does not accommodate her mobility needs, preventing her from positioning herself comfortably and accessing banking services with ease. The excessive height creates an obstacle that forces her to depend on third-party assistance for transactions. This ongoing struggle makes her feel dissuaded from visiting the branch, as each visit becomes an unnecessary challenge. The absence of an appropriately designed counter not only limits her autonomy but also turns a simple banking task into an exhausting and frustrating process.

- 151.2. Limited Accessibility Due to Lack of Clearance: Mrs. Mirta Colón is unable to properly approach the service counter at the Ave. de 65 Infantería Shopping Center branch due to the lack of open space beneath it. Without sufficient clearance, she cannot position herself correctly, making access to banking services unnecessarily difficult. The inability to get close to the counter restricts her mobility, forcing her into uncomfortable positions. This lack of accessibility discourages her from going to the branch, as the process becomes increasingly inconvenient. The physical barrier at this service point not only compromises her ability to bank comfortably but also turns a routine transaction into an exhausting and frustrating experience.
- 151.3. The barriers on the property could be eliminated by implementing structural improvements that allow Mrs. Mirta Colón to access banking services without unnecessary physical obstacles. Adjusting the height of the transaction and customer service counter ensures that she can comfortably position herself and interact with bank staff without difficulty, allowing her to complete transactions independently instead of relying on third-party assistance. Additionally, modifying the counter to include adequate clearance underneath enables her to properly approach the service area while using her mobility device. The absence of this adjustment currently forces her into uncomfortable positions or makes her dependent on assistance for tasks she should be able to complete on her own. Addressing these accessibility issues enhances her banking experience and prevents unnecessary physical strain caused by inadequate design.

152. Ms. Mirta Colón often visits the Barbosa area to do her shopping at the Supermercado Plaza Loíza Express, a store she regularly frequents. Since this area is part of her routine, she is interested in going to the Barbosa branch, as it offers her the convenience of completing her banking transactions efficiently without having to travel elsewhere. However, Since October 2024, Ms. Colón is aware that there are architectural barriers at the location that affect her mobility, making it difficult for her to move freely within the branch. Since her ability to move is reduced, these obstacles restrict her access and make it harder for her to remain in the establishment. The presence of these barriers makes her feel dissuaded from visiting.

153. The barriers that Mrs. Colon is aware of are:

153.1. Obstructive Counter Design Limits Accessibility: Mrs. Mirta Colón encounters significant difficulty using the transaction and customer service counter at the Barbosa branch due to its excessive height. The counter's design does not accommodate her mobility needs, creating a physical barrier that prevents her from accessing services independently. Because she cannot position herself correctly, she struggles to complete her transactions without outside help. This challenge makes her visits to the branch uncomfortable and discouraging, as she feels unable to manage her banking needs without unnecessary obstacles. The inaccessibility of the counter not only restricts her autonomy but also turns a routine visit into a physically demanding and frustrating experience.

153.2. Counter Design Prevents Proper Access: At the Barbosa branch, Mrs. Mirta Colón faces additional barriers due to the lack of open space beneath the counter. Without adequate clearance, she cannot approach the service area comfortably,

making the banking process unnecessarily difficult. The inability to position herself correctly limits her mobility and forces her into awkward postures or dependence on others for assistance. This ongoing struggle discourages her from visiting the branch, as each trip requires additional effort and discomfort. The failure to provide an accessible design at this service point reduces her independence and transforms a simple banking transaction into an exhausting and frustrating ordeal.

153.3. The barriers on the property could be eliminated by modifying the counter to allow a person using a mobility device to approach properly. To achieve this, it is essential to install a section with an accessible height and an open space underneath to facilitate interaction with staff. In its current state, the counter's design does not allow Mrs. Colón to position herself correctly, which limits her autonomy when receiving service. Making these modifications ensures equitable access to financial services and contributes to a more inclusive customer experience.

154. Ms. Mirta Colón often visits the Río Piedras area to enjoy the local dining scene, with Selena Pizzería being one of her favorite restaurants. Since she frequently spends time in this area, she is interested in going to the Plaza del Mercado Río Piedras branch to manage her banking transactions while handling other activities. However, since September 2025, Ms. Colón is aware that architectural barriers at the establishment affect her mobility, making it difficult for her to move freely within the branch. Given her limited mobility, these obstacles restrict her access and make it harder for her to remain in the location. The presence of these barriers discourages her from visiting, as she knows

she faces difficulties in completing her transactions comfortably and without unnecessary effort.

155. The barriers that Mrs. Colon is aware of are:

- 155.1. Lack of Accessibility at the Transaction and Customer Service Counter: Mrs. Mirta Colón is aware of difficulties using the transaction and customer service counter at the Plaza del Mercado Río Piedras branch due to its excessive height. The design of the counter does not accommodate her needs, preventing her from positioning herself comfortably to receive service. The lack of an accessible surface makes transactions challenging, limiting her ability to bank independently. As a result, she must either rely on assistance from others or place herself in uncomfortable positions that compromise her safety and convenience. This inaccessibility reduces her autonomy and makes each visit to the branch unnecessarily difficult and exhausting. The certainty of encountering these obstacles discourages her from going to the branch, as she knows she will struggle to complete her banking transactions with ease.
- 155.2. Counter Without Clearance: Furthermore, the counter at the Plaza del Mercado Río Piedras branch does not provide open space beneath it, making it impossible for Mrs. Mirta Colón to approach it properly. Without sufficient clearance, she cannot position herself correctly, which complicates her ability to manage transactions comfortably. This limitation forces her to depend on external assistance or strain herself physically, negatively affecting her well-being. The lack of accessibility at this service point not only restricts her independence but also turns a simple banking task into a frustrating and physically demanding

experience. Knowing she faces these difficulties makes her feel discouraged from visiting the branch, as the effort required to complete routine transactions becomes an unnecessary burden.

155.3. The barriers on the property could be eliminated by making structural modifications that ensure Mrs. Mirta Colón can access banking services comfortably and independently. Lowering the height of the transaction and customer service counter allows her to properly position herself at the service area, facilitating communication with staff and enabling her to complete transactions without relying on third-party assistance. Additionally, creating sufficient clearance beneath the counter ensures that she can approach the service area correctly while using her mobility device. Without this modification, she is forced into uncomfortable postures or requires external assistance to complete basic banking tasks. Addressing these accessibility barriers not only improves her experience at the branch but also eliminates unnecessary challenges that currently limit her autonomy.

156. Ms. Mirta Colón often visits the Cupey area, where she enjoys the local dining options, and Facciola Panadería y Repostería is one of her favorite places to stop by. Since she frequently spends time in this area, she desires to go to the Cupey Center (Evertec) branch to manage her banking transactions conveniently while taking care of other activities in the same location. However, since September 2025, Ms. Colón is aware that the establishment has architectural barriers that make mobility challenging, preventing her from navigating the branch with ease. Since her ability to move is limited and she relies on a mobility assistance device, these obstacles create a significant barrier for her.

The certainty of facing these difficulties dissuades her from visiting, as she knows she will struggle to access banking services comfortably and without restrictions. The barriers are:

- 156.1. Extremely Tall Transaction and Customer Service Counter: Ms. Mirta Colón is aware that the transaction and customer service counter at the Cupey Center (Evertec) branch does not have an accessible design, as it is too high, preventing her from comfortably approaching to receive service. This barrier directly affects her ability to access banking services independently. The lack of an accessible counter restricts her ability to position herself properly, making it difficult to complete her banking transactions without struggle. As a result, she is forced to stretch uncomfortably or depend on third-party assistance to manage her transactions. The absence of a counter at an appropriate height limits her autonomy and turns her experience at the branch into a physically and emotionally exhausting process, discouraging her from visiting.
- 156.2. Counter Without Clearance: Ms. Mirta Colón is aware that the counter at the Cupey Center (Evertec) branch lacks open space beneath it, preventing her from properly positioning herself with her mobility device. The absence of an accessible area under the counter creates a significant barrier, as it limits her ability to approach safely and comfortably. This restriction forces her into uncomfortable postures or requires her to rely on external assistance to complete her transactions. The lack of accessibility at this service point not only reduces her independence but also turns a routine banking task into an unnecessarily

physically and emotionally demanding experience, further discouraging her from going to the branch.

156.3. The barriers on the property can be eliminated by installing an accessible counter at an appropriate height with open space underneath, allowing Ms. Mirta Colón to approach comfortably while using her mobility device. The current infrastructure prevents her from positioning herself properly at the service area, forcing her into uncomfortable postures or making her rely on third-party assistance to complete her transactions. Making these modifications ensures equitable access to services and significantly improves her banking experience, removing unnecessary obstacles that currently limit her independence.

157. Ms. Mirta Colón is a frequent client of Banco Popular, and relies on the bank's stability and diverse financial services to manage her finances efficiently and securely. She has regularly conducted her banking transactions at Banco Popular, including visits to the Barrio Obrero branch. However, her last visit to this branch was in January 2025, after which she began feeling dissuaded from returning due to the architectural barriers she encountered. These obstacles significantly affected her experience, as her mobility device made it difficult for her to navigate the branch comfortably and complete her transactions independently. The challenges she faced during her visit have discouraged her from returning, as she knows she continues to struggle with the same accessibility issues.

158. The barriers that Mrs. Colon is aware of are:

158.1. Inaccessible Counter Limits Banking Access: Mrs. Mirta Colón, who uses a wheelchair, faces significant challenges at the transaction and customer service counter at the Barrio Obrero branch due to its excessive height. The design

prevents her from properly positioning herself to receive assistance, making access to services difficult and inequitable. She cannot comfortably interact with staff or complete her banking transactions independently. This ongoing struggle discourages her from returning to the branch, as she knows she faces the same obstacles each time she visits. As a result, she is forced to stretch uncomfortably or depend on third-party assistance, which compromises her autonomy and makes each visit an unnecessarily complicated and exhausting process.

158.2. Lack of Clearance Prevents Proper Access: Mrs. Mirta Colón also encounters barriers due to the absence of open space beneath the counter at the Barrio Obrero branch. Without proper clearance, she cannot position herself correctly while using her wheelchair, making it difficult to access banking services. The certainty of facing these mobility restrictions dissuades her from returning, as she knows she struggles to complete routine transactions without discomfort or assistance. This limitation forces her into uncomfortable postures and increases her reliance on external help. The inaccessibility of this service point restricts her independence and discourages her from visiting the branch, as each transaction becomes an unnecessarily demanding experience.

158.3. The obstacles at the branch can be eliminated by modifying the counter to ensure proper access for wheelchair users. Lowering the height and providing sufficient clearance underneath would allow Mrs. Colón to conduct her transactions comfortably and independently. However, the current setup makes every banking visit an exhausting experience, discouraging her from returning. The lack of accessibility forces her to choose between seeking assistance or struggling

through an uncomfortable process. Implementing these modifications provides her with a more inclusive and accommodating experience, removing barriers that currently make her avoid the branch.

159. Ms. Mirta Colón seeks to visit the Muñoz Rivera branch to manage her finances securely and efficiently. However, since November 2024 she is aware architectural barriers at the establishment interfered with her ability to use the space effectively, restricting her access to banking services. Given her limited mobility, these obstacles compromise her independence and ability to remain in the location without difficulty. The presence of these barriers makes her feel dissuaded from visiting the branch.

160. The barriers that Mrs. Colon is aware of are:

160.1. Inaccessible Transaction and Customer Service Counter: Mrs. Mirta Colón is aware that the transaction and customer service counter at the Muñoz Rivera branch is set at an excessive height, preventing her from positioning herself properly to receive assistance. This lack of accessibility creates a significant obstacle to obtaining services under equitable conditions, as she is unable to engage with staff comfortably and efficiently. The difficulty in reaching the counter forces her to overextend herself in an impractical manner or rely on third-party assistance, which undermines her independence and turns a simple banking process into an unnecessarily difficult and exhausting experience. These challenges dissuade her from visiting the branch, as she anticipates unnecessary discomfort and difficulty in accessing the services she needs.

160.2. Service Counter Without Proper Accommodation: Mrs. Mirta Colón is also aware that the service counter at the Muñoz Rivera branch lacks an open space

underneath, preventing her from positioning herself appropriately in the service area. This structural limitation makes it impossible for her to access the counter in a functional and comfortable manner, creating a barrier that affects both her ability to complete transactions and communicate effectively with bank personnel. The need to adopt uncomfortable postures or depend on external assistance further diminishes her autonomy. The inaccessibility of this service point discourages her from visiting the branch, as she cannot complete her banking operations without unnecessary complications.

160.3. The lack of an accessible counter at the Muñoz Rivera branch presents a significant barrier for customers with mobility impairments, directly affecting their ability to conduct transactions independently. These obstacles make Mrs. Colón feel discouraged from visiting the branch, as she anticipates a frustrating and inefficient experience. Installing a counter at an appropriate height with adequate clearance underneath allows individuals using mobility devices to position themselves properly and receive service without limitations. Implementing these adjustments ensures equal access and enables customers with disabilities to carry out their banking transactions comfortably and independently.

161. Mrs. Mirta Colón is a client of Banco Popular and she is interested in visiting the Branch Galería Los Paseos, as it is a well-located and highly functional bank branch that offers excellent services, including efficient account management, transactions, and personalized financial assistance. The branch's professional environment, combined with its strategic location within the Galería Los Paseos shopping center, makes it an ideal place for her to manage her finances while also taking care of other personal needs.

Located just 12 minutes by car from her home, 10.4 km away, the branch is conveniently situated near an Amigo supermarket, allowing her to do her grocery shopping and other activities at the same time. However, since October 2024, she has encountered architectural barriers at this branch due to her mobility limitations, which make it difficult for her to comfortably access and navigate the space. As a result, she feels discouraged from visiting the branch. The barriers are:

- 161.1. Counter Too High: Mrs. Mirta Colón is aware that the bank counter at the Galeria Los Paseos branch is too high, preventing her from approaching it frontally with her mobility device. Using a motorized wheelchair, she is unable to elevate herself to reach the surface comfortably. Her severe arthritis makes it painful to extend her arms for prolonged periods, while her diabetic neuropathy causes additional discomfort when she remains in an unnatural position. The effort required to stretch beyond her limits increases her fatigue, aggravated by her COPD and sleep apnea, making every transaction more exhausting. As a result of this barrier, she feels discouraged from visiting the branch.
- 161.2. Narrow Counter: Mrs. Mirta Colón is also aware that the bank counter at the Galeria Los Paseos branch is too shallow, which affects her ability to position herself properly with her mobility device. The limited depth prevents her from aligning her motorized wheelchair in a way that allows her to comfortably reach documents or interact with bank staff. Her thrombosis and diabetic neuropathy make it difficult for her to maintain an extended posture, while the lack of space forces her to stretch her arms beyond her comfort level, worsening her arthritis pain. Additionally, her portable oxygen tank further restricts her range of motion,

making transactions unnecessarily difficult. The presence of this barrier discourages her from visiting the branch.

161.3. The barriers on the Branch Galería Los Paseos could be eliminated by implementing accessibility modifications that allow it to interact comfortably with the bank counter. The counter height should be lowered or an accessible section should be added. Additionally, the counter depth should be adjusted to allow the ladies' mobility devices to fit properly underneath. Installing an adjustable or pull-out section could also provide flexibility. These changes should be accompanied by clear accessibility signage and staff training to ensure proper assistance when needed.

162. Mrs. Mirta Colón has been a client of Banco Popular for many years and is interested in visiting Branch Parada 34 - Hato Rey because she knows it offers excellent customer service, with friendly and trustworthy advisors who make her feel very comfortable handling her banking transactions. It is located in a beautifully designed and decorated building, which she finds very pleasant. The branch is conveniently located just 2 minutes by car from her home, only 500 meters away, making it an ideal choice for her to handle her banking needs. However, she feels discouraged from visiting because, since October 2024, she has known that architectural barriers prevent her from easily accessing and using the bank's services. The barriers that Mrs. Colon is aware of are:

162.1. Excessive counter height: Mrs. Mirta Colón is aware that the bank counter is too high, preventing her from accessing it comfortably and efficiently due to her mobility conditions. She relies on a motorized wheelchair due to limited mobility and struggles to lift her arms high enough without straining her shoulders and

wrists, which worsens the pain from her severe arthritis. Furthermore, her respiratory difficulties caused by COPD make any additional physical effort exhausting, further complicating her ability to conduct banking transactions in an environment that is not adapted to her needs. This barrier makes her feel discouraged from visiting the branch.

162.2. Lack of Counter Depth: Mrs. Mirta Colón is conscious that the bank counter is too shallow, preventing her from positioning herself properly to complete her banking transactions. She cannot bring her motorized wheelchair close enough because its base collides with the counter. This forces her to stretch beyond her mobility limits, increasing strain on her inflamed joints from arthritis and making it difficult for her to handle documents or use electronic devices. Additionally, due to her diabetic neuropathy, any improper posture causes constant discomfort, making her banking experience both uncomfortable and exhausting. Confronted with this barrier, she feels dissuaded from visiting the branch.

162.3. The barriers on Branch Parada 34 - Hato Rey could be eliminated by adjusting the height of the counter to an accessible level. The counter should also include a designated lower section. Additionally, increasing the depth of the counter can provide sufficient space for proper positioning, allowing for easier document handling and transactions. The area in front of the counter should remain clear of obstacles to facilitate direct access. Implementing these changes improves functionality and ensures a more efficient and accessible environment.

163. Mrs. Mirta Colón is a client of Banco Popular and is interested in using the services of Branch Montehiedra because it offers a quiet and organized environment, and the staff is

known for being professional and helpful. She values this branch over other alternatives because it allows her to manage her banking affairs directly, receive tailored assistance, and feel more confident than when using digital banking or self-service kiosks. The branch is located just 15 minutes by car from her home, only 11.7 km away, making it a convenient option for her. However, she feels discouraged to visit because, since October 2024, she has been aware that the branch has structural obstacles that hinder accessibility. Her health conditions require her to rely on a motorized wheelchair and portable oxygen at all times. Given these challenges, she fears facing difficulties and exclusion, which discourages her from going to the branch. The barriers that Mrs. Mirta Colón is aware of are:

- 163.1. Raised service counter: Mrs. Mirta Colón knows that the bank counter is too high, making it difficult for her to access services due to her mobility limitations. She uses a motorized wheelchair due to restricted mobility and finds it difficult to raise her arms high enough without straining her shoulders and wrists, which worsens the pain caused by arthritis. Additionally, her COPD limits her breathing, and any additional physical effort, such as reaching for the counter, increases her fatigue, making transactions more exhausting. Facing this barrier, she feels discouraged from visiting the branch.
- 163.2. Insufficient Counter Depth: Mrs. Mirta Colón acknowledges that the bank counter lacks sufficient depth, making it difficult for her to position herself properly to complete her transactions. She is unable to bring her motorized wheelchair close to the counter because its base collides with the structure, forcing her to stretch beyond what her mobility allows. This increases strain on her joints affected by

arthritis, making it more difficult to manage paperwork or use banking devices. Furthermore, her diabetic neuropathy causes constant discomfort when she cannot maintain a proper position, making the experience unnecessarily challenging. The existence of this barrier has dissuaded her from visiting the branch.

163.3. The barriers on Branch Montehiedra could be eliminated by modifying the counter to a more accessible height. Adding a lower section improves reachability and comfort. Expanding the depth of the counter allows for better positioning, preventing unnecessary strain and enhancing usability. Keeping the surrounding area free of obstacles facilitates smooth access. These adjustments create a more practical and accommodating space.

164. Mrs. Mirta Colón is a client of Banco Popular and has visited Branch Popular Center because it offers direct customer support, a secure setting for handling transactions, and the convenience of resolving any concerns without delays. She favors this branch over others due to its strong reputation for professionalism and the quality of service provided. The branch is conveniently located just 10 minutes by car from her home, only 3.3 km away, making it a practical option for her. However, she feels discouraged to visit because, since November 2024, she has been aware that the location presents physical barriers that make it challenging for her to access services with ease. Her last visit was in December 2024, and as a result, she feels discouraged from returning. Given her reliance on a motorized wheelchair and portable oxygen, she fears facing difficulties and exclusion, as the physical barriers at the branch make it hard for her to access services. During her last visit, she struggled to access services and required assistance for basic transactions, which made her feel vulnerable and dependent. Because of this, she worries

about experiencing the same challenges again and feeling discriminated against due to her mobility limitations, which ultimately discourages her from going. The barriers that Mrs. Mirta Colón knows about are:

- 164.1. Inaccessible counter height: Mrs. Mirta Colón is aware that the counter is set at an excessive height, making transactions difficult due to her mobility limitations. She relies on a motorized wheelchair and faces challenges in raising her arms high enough to sign documents or interact with banking devices. This added effort places strain on her joints affected by arthritis and increases fatigue due to her respiratory condition, making every transaction more physically demanding. This barrier causes her to feel dissuaded from going to the branch.
- 164.2. Reduced depth counter: Mrs. Mirta Colón recognizes that the counter's limited depth prevents her from positioning herself properly to conduct her transactions. She finds that the base of her motorized wheelchair collides with the counter, stopping her from getting close enough. As a result, she must stretch her arms beyond her comfort level, increasing joint pain due to arthritis and making it harder to handle paperwork or banking devices. Additionally, her diabetic neuropathy causes continuous discomfort, which is aggravated when she cannot maintain a stable and ergonomic position, making transactions unnecessarily difficult. This barrier serves as a discouragement, preventing her from visiting the branch.
- 164.3. The barriers on Branch Popular Center could be eliminated by adjusting the counter height to a more accessible level. Installing a lower section provides an alternative surface that allows for making transactions comfortably. Increasing the

counter depth allows for better positioning, preventing unnecessary strain and improving accessibility. These modifications create a more functional and efficient environment.

165. Mrs. Mirta Colón is a client of Banco Popular and is considering using the services of the branch located in El Señorial Shopping Center because it offers fast service, face-to-face assistance, and a secure environment for managing financial transactions. The branch is conveniently located just 15 minutes by car from her home, only 9.3 km away, making it a practical option for her. She finds this location particularly convenient since being inside a shopping center allows her to take care of other errands. However, she feels discouraged to visit because, since November 2024, she has known that the branch has physical barriers that prevent her from accessing the bank's services with ease. The barriers that Mrs. Mirta Colón recognizes are:

165.1.1. Counter Too High: Mrs. Mirta Colón acknowledges that the counter's excessive height hinders her ability to approach it directly and comfortably. She depends on a motorized wheelchair and portable oxygen and experiences discomfort when trying to extend her arms to sign documents or communicate with staff. Because of this, the counter's height imposes a physical challenge that complicates her ability to carry out banking transactions smoothly. As a result of this barrier, she has been discouraged from visiting the branch.

165.1.2. Insufficient Counter Depth: Mrs. Mirta Colón is aware that the counter's limited depth further restricts her ability to position herself comfortably. Her reduced mobility, along with the need to carry oxygen support, makes

it difficult for her to remain in a stable position, as there is not enough space for her to maneuver adequately. As a result, the insufficient depth prevents her from interacting effectively with the counter, making banking transactions more physically demanding. Due to this obstacle, she is discouraged from going to the branch.

165.1.3. The barriers on Branch El Señorial Shopping Center could be eliminated by adjusting the counter height to a level that allows direct and comfortable access. Lowering the surface ensures that transactions can be completed without excessive strain. Additionally, the counter should have sufficient depth to provide adequate space for positioning and maneuvering without difficulty. Expanding the available surface area allows for a more functional and efficient interaction. Implementing these adjustments improves accessibility.

166. Mrs. Mirta Colón is a client of Banco Popular and wants to use the services of Branch San Jose because she knows it is spacious, has well-organized customer service lines, and provides efficient assistance. These features make it a preferable option for her over other branches, as they allow her to complete her banking tasks with greater ease and comfort. The branch is conveniently located just 12 minutes by car from her home, only 7.1 km away, making it a practical choice for her. However, since November 2024, she has known that the branch has architectural barriers that limit accessibility, which makes her feel discouraged from going. Due to her health conditions and mobility restrictions, these obstacles directly affect her ability to use the services comfortably, making her reluctant to visit. The barriers that Mrs. Mirta Colón acknowledges are:

- 166.1. Difficult-to-reach counter: Mrs. Mirta Colón is aware that the counter, which exceeds 36 inches in height and is brown in color, creates a significant obstacle when trying to approach it directly. She depends on a motorized wheelchair and an oxygen tank and struggles to position herself at an adequate height to write or exchange documents without considerable effort. The excessive height of the brown counter prevents her from independently completing essential banking tasks. She feels dissuaded from visiting the branch as a direct result of this barrier.
- 166.2. Low depth counter: Mrs. Mirta Colón recognizes that the brown counter is too shallow, preventing her from approaching it in a way that allows her to conduct transactions comfortably. Her motorized wheelchair and attached oxygen tank extend forward, and the shallow surface does not provide enough space for her to position herself properly, forcing her to stretch uncomfortably. As a result, she experiences unnecessary difficulties when trying to access banking services. This barrier causes her to feel dissuaded from going to the branch
- 166.3. The barriers on Branch San Jose could be eliminated by lowering the counter to a height that allows for direct frontal access, ensuring it aligns with standard accessibility guidelines. Additionally, increasing the counter's depth provides sufficient space for proper positioning, enabling the completion of transactions without unnecessary strain. These adjustments should be implemented to create a more functional and accommodating environment.
167. Mrs. Mirta Colón is a client of Banco Popular and considers Branch Parada 26 a suitable option for handling her banking transactions because it offers a calm environment, staff members are attentive and professional, and transactions are processed quickly. These

factors make it stand out from other branches, as they provide her with a smoother and more comfortable banking experience. The branch is conveniently located just 4 minutes by car from her home, only 1.8 km away, making it easily accessible. However, she feels discouraged to visit because, since December 2024, she is aware that the branch has architectural barriers that complicate her ability to use the services with ease. Given her mobility challenges, these obstacles represent a significant difficulty for her, discouraging her from going. The barriers that Mrs. Mirta Colón recognizes are:

- 167.1. Elevated Counter Surpassing 36 Inches: Mrs. Mirta Colón knows that the counter is higher than 36 inches, making direct access difficult. She uses a motorized wheelchair and is unable to position herself close enough to the counter. Her restricted mobility and the need for constant oxygen support further complicate her ability to complete transactions, increasing her physical strain. Owing to this barrier, she feels discouraged from visiting the branch.
- 167.2. Limited Counter Depth: Mrs. Mirta Colón is aware that the counter lacks sufficient depth, preventing her from positioning herself properly in front of it. She struggles to maintain a stable posture when using the counter, as the shallow surface does not provide the necessary space to accommodate her motorized wheelchair. This limitation makes every interaction more physically demanding. This barrier serves as an obstacle, discouraging her from visiting the branch.
- 167.3. The barriers on Branch Parada 26 could be eliminated by modifying the counter to a lower height, allowing for unobstructed and direct interaction. At the same time, extending its depth creates sufficient space for proper alignment, facilitating

more efficient use. These changes should be applied to enhance accessibility and convenience within the establishment.

168. Mrs. Mirta Colón is a client of Banco Popular and wants to handle her banking transactions at Branch Street Loiza because its surroundings offer additional benefits beyond financial services. The area is filled with great restaurants, allowing her to enjoy a good meal after completing her errands, which makes her visits more convenient and enjoyable. The branch also provides prompt service, making her banking experience smoother. The branch is conveniently located just 7 minutes by car from her home, only 3.7 km away, making it easily accessible. However, she feels discouraged to visit because, since December 2024, she is aware that the branch has architectural barriers that limit accessibility. Considering her mobility restrictions, these obstacles make it difficult for her to use the services comfortably, discouraging her from going. The barriers that Mrs. Mirta Colón acknowledges are:

168.1.1. Counter Taller Than 36 Inches: Mrs. Mirta Colón acknowledges that the counter exceeds 36 inches in height, making direct access difficult. She uses a motorized wheelchair and faces challenges in aligning herself properly in front of the counter. The elevated height, combined with her limited range of motion and the constant need for her oxygen device, makes completing transactions more strenuous. The presence of this barrier discourages her from going to the branch.

168.1.2. Counter with Insufficient Depth: Mrs. Mirta Colón is aware that the counter does not provide enough depth, preventing her from getting close enough to use it effectively. She finds it difficult to maintain a comfortable

position in front of the counter with her motorized wheelchair, as the limited space forces her to stretch uncomfortably, increasing physical strain when conducting transactions. This barrier negatively impacts her, leaving her discouraged from visiting the branch.

168.1.3. The barriers on Branch Street Loiza could be eliminated by modifying the counter to a lower height, allowing for unobstructed and direct interaction. At the same time, extending its depth creates sufficient space for proper alignment, ensuring more efficient use. These changes should be applied to enhance accessibility and convenience within the establishment.

169. Mrs. Mirta Colón is a client of Banco Popular and wants to take care of her banking needs at Branch Señorial Center because she knows it is centrally located, easily accessible, and offers a comfortable atmosphere. The branch provides an organized and efficient service, allowing her to complete her financial errands without unnecessary delays. The branch is conveniently located just 12 minutes by car from her home, only 11.4 km away, making it a practical choice for her. However, she feels discouraged to visit because, since December 2024, she is aware that the branch has architectural barriers that make it difficult for her to use the services comfortably. Given her mobility restrictions, these challenges create obstacles that discourage her from going. The barriers that Mrs. Mirta Colón acknowledges are:

169.1. Counter at an Inaccessible Height: Mrs. Mirta Colón is aware that the counter's height, which exceeds 36 inches, prevents her from comfortably approaching it. Mrs. Colón, who relies on a motorized wheelchair and an oxygen tank, is unable to position herself at an adequate height to write or exchange documents without

significant effort. The counter's excessive height limits her ability to complete necessary tasks independently. Because of this barrier, she hesitates to visit the branch as she feels discouraged.

169.2. Reduced-Depth Counter: Mrs. Mirta Colón also recognizes that the counter's insufficient depth prevents her from getting close enough to complete transactions efficiently. Her motorized wheelchair and attached oxygen tank extend forward, and the shallow surface does not allow her to position herself comfortably, forcing her to stretch beyond her physical limits. As a result, she faces unnecessary difficulty when trying to access banking services. She feels dissuaded from visiting the branch due to this barrier.

169.3. The barriers on Branch Señorial Center could be eliminated by lowering the counter to an appropriate height, allowing for easier and more direct access. Additionally, increasing the counter's depth ensures more practical interactions and provides sufficient space to maneuver. Implementing these modifications enhances usability and promotes a more accommodating environment.

170. Mrs. Mirta Colón wants to visit the Branch Centro Médico because its location is a great advantage for her. Being only fifteen minutes by car from her home, it allows her to manage her financial matters without having to travel long distances. For her, this is essential, as her mobility is limited, and she needs to use oxygen due to her medical conditions. Having access to nearby banking services makes her daily life easier and gives her peace of mind knowing she can rely on a trusted place for her transactions. Furthermore, despite her interest in visiting this branch, since December 2024, Mirta has identified certain architectural barriers that discourage her from visiting, as she believes

that her visit makes a distressing and even discriminatory experience. The barriers are as follows:

- 170.1. Too High Customer Service Counters: One of the main difficulties Mirta faces is the height of the customer service counters. Since she relies on a motorized wheelchair and uses oxygen, it is difficult for her to reach the area where she needs to sign documents or receive cash. This, combined with her severe gastritis and diabetic neuropathy, requires her to stretch, causing her pain and extreme fatigue. As a result, she becomes dependent on others for these tasks, which significantly affects her autonomy and comfort, discouraging her from visiting the branch.
- 170.2. Limited Space to Maneuver Her Wheelchair: The design of the customer service area is not fully adapted for individuals with reduced mobility. On several occasions, Mirta has had difficulty moving within the branch due to the lack of depth in the counters, which prevents her from accessing them directly with her wheelchair. This forces Mirta to avoid visiting the branch in order to prevent uncomfortable and unsafe maneuvers that delay her service and expose her to unnecessary risks.
- 170.3. To ensure that Mirta Colón can access banking services comfortably and independently, the following improvements are recommended: Lower a section of the counter to an appropriate height, allowing her to conduct transactions more comfortably. Increase the depth of the counter to enable her to access documents and payment devices directly and frontally with her wheelchair, without additional effort.

171. After receiving positive feedback from friends and colleagues about the Branch Parada 22 being one of the most modern and innovative in financial services, Mrs. Mirta Colón has been intrigued by the idea of visiting. She sees the branch as a symbol of trust and stability, offering cutting-edge products that align with her needs. Mirta appreciates the value of a financial institution that keeps evolving. Notwithstanding, since November 2024, she has refrained from visiting due to architectural barriers that hinder her ability to fully access the services.

171.1. Excessive Counter Height: Mrs. Mirta Colon faces a significant challenge due to the height of the customer service counters at the Parada 22 branch. Due to her medical conditions, including severe arthritis, COPD, and venous thrombosis, it is impossible for her to comfortably reach the counter while seated in her motorized wheelchair. This physical limitation forces her to rely on others to sign documents or carry out banking activities. The effort of stretching to access the necessary services not only causes physical discomfort but also leads to considerable fatigue. This experience makes the branch difficult for her to use independently, which has led her to avoid visiting it altogether.

171.2. Insufficient Counter Depth for Accessibility: Another issue Mrs. Mirta Colon has encountered is the lack of sufficient depth at the counters at the Parada 22 branch. The limited space at the base of the counter prevents her from approaching it comfortably in her wheelchair. She is forced to make awkward adjustments to position herself in front of the service area, which affects her stability. Given her health condition, which includes venous thrombosis, remaining in such an uncomfortable position for any length of time causes pain and swelling, further

complicating her banking experience. This barrier significantly limits her autonomy, making it difficult for her to access the services she needs at this branch, ultimately leading her to refrain from visiting.

171.3. To improve accessibility, the counters at the Parada 22 branch should be redesigned to provide adequate depth, allowing Mrs. Mirta Colón to approach them fully with her motorized wheelchair and maintain a stable and comfortable position. Any obstructions at the base that impede easy access for wheelchairs must be removed, ensuring the space is deep enough to offer better mobility and direct access. These changes would allow Mrs. Mirta visits the branch independently, creating a more inclusive and accessible environment for her.

172. Mrs. Mirta Colón has considered visiting the Branch Reparto Metropolitano on several occasions, as it offers a convenient location that fits her daily routine, making it an accessible option for handling her financial matters without long commutes. Additionally, she frequently has errands to run in the area, making stopping at the bank a practical and time-saving decision. Being able to complete her transactions while managing other commitments can help her maintain her independence and avoid unnecessary physical strain. Nevertheless, since October 2024, she has been discouraged from visiting this branch due to these architectural barriers that make the experience inaccessible for her:

172.1. Overly High Counter: 4. Mrs. Mirta Colón is aware of a significant obstacle at the Reparto Metropolitano branch due to the excessively high customer service counters. Her medical conditions, including severe arthritis, COPD, and venous thrombosis, make it impossible for her to interact with the counter while seated in her motorized wheelchair and using portable oxygen. The height of the counter

forces her to rely on others for assistance. This physical barrier makes even the simplest banking tasks difficult to carry out independently, leading to physical discomfort and frustration. The effort required to stretch and reach the counter only increases her fatigue, making the branch a less viable option for her.

172.2. **Insufficient Counter Depth and Accessibility:** Another challenge Mrs. Mirta Colón faces is the lack of adequate depth at the counters. The limited space at the base of the counter prevents her from positioning her wheelchair comfortably, forcing her to make uncomfortable adjustments just to access the services she needs. This not only affects her stability but also exacerbates her medical issues, such as the pain and swelling caused by venous thrombosis. The inability to maintain a comfortable and stable position during banking transactions makes the experience physically exhausting, ultimately discouraging her from visiting the branch.

172.3. To eliminate the current obstacles, it is essential to redesign the customer service counters. One solution is to incorporate a section that does not exceed 36 inches in height, allowing Mrs. Mirta Colón to manage her transactions without needing to stretch or seek assistance. Another approach could involve creating a designated area with counters specifically adapted for individuals with mobility limitations, offering Mrs. Mirta the same level of service as other customers while ensuring her comfort. Furthermore, the counters should be deeper to allow Mrs. Mirta to approach without obstruction, guaranteeing that she can maintain a stable and comfortable position. These modifications would enable Mrs. Mirta Colón to visit the Branch Reparto Metropolitano with greater independence and ease.

173. Mrs. Mirta Colón, a long-time Banco Popular customer, has considered the Branch Condado Centro due to its excellent location, just a 10-minute drive from her home. This proximity is especially important to her, as she requires oxygen and avoids traveling long distances that could affect her physically. The branch's closeness provides her with the opportunity to manage her financial matters without having to deal with complicated trips. Additionally, the positive recommendations she has received from friends and colleagues about the quality of service have motivated her to visit. Despite this, since October 2024, she has chosen not to visit the branch due to certain architectural barriers that make it difficult for her to comfortably access the services. The barriers she has encountered are as follows:

173.1. Excessive Counter Height for Accessibility: Mrs. Mirta Colón finds that there are usability issues with the customer service counters at the Branch Condado Centro. Due to her arthritis and mobility issues, she cannot reach the counter comfortably while seated in her motorized wheelchair. The height of the counter prevents her from raising her arms high enough to sign documents or complete transactions independently, requiring assistance from others. The need to stretch or adjust her posture to access the counter causes discomfort and worsens her arthritis. This physical effort, combined with the difficulty of using the counter on her own, has made Mrs. Colón hesitant to visit the branch, as she feels the challenges she faces outweigh the potential benefits.

173.2. Limited Space for Wheelchair Access: Mrs. Colón has also observed that the Branch Condado Centro lacks a counter that allows her to access it directly from her motorized wheelchair. Due to her mobility difficulties caused by diabetic

neuropathy, thrombosis, and the need for a portable oxygen tank, she requires enough space to move safely in front of the counter. The lack of counter depth forces her to make awkward and sometimes risky maneuvers, compromising her stability and making her feel more vulnerable. As a result, Mrs. Colón has been discouraged from visiting the branch, as the discomfort and potential health risks make it difficult for her to carry out her banking tasks comfortably.

173.3. To resolve the barriers, the existing counters should be modified to include a section with a height no higher than 36 inches. This allows Mrs. Mirta to access the counter independently without needing to stretch or rely on assistance to sign documents or complete transactions. Another solution is to install adjustable-height counters. This provides flexibility for Mrs. Mirta, allowing the counter to be adjusted to a comfortable height, ensuring greater independence when conducting banking activities. Furthermore, the counter layout should be reconfigured to allow for frontal access and the movement of Mrs. Mirta's motorized wheelchair. This enables her to approach freely without encountering obstacles, providing a more comfortable and safer environment. Mrs. Mirta knows that once these barriers are removed, she can visit the Branch Condado Centro.

174. Mrs. Mirta Colón, a devoted customer of Banco Popular, has visited the Branch Plaza Las Américas several times due to its proximity, as it is only a 9-minute drive from her home. The branch's location makes it a convenient option for her, especially because it is also close to other places where she needs to run errands. Additionally, Mrs. Colón has had positive experiences with the service at this branch, which reinforced her decision to

continue using it. Nevertheless, since September 2024, Mrs. Colón stopped visiting the branch due to the barriers she encountered during her visits, which made it difficult for her to handle her banking matters comfortably and independently. Despite the good service she received, the architectural barriers have led her to avoid the branch during her visits:

- 174.1. Inaccessible Customer Service Counter: When Mrs. Colón visited the branch previously, she noticed that the customer service counters were too high for her to use independently while seated in her motorized wheelchair. Due to her severe arthritis and mobility limitations, she is unable to reach the counter comfortably, which forces her to rely on others for assistance when completing transactions or signing documents. Furthermore, the counter's height causes physical discomfort and fatigue, as the effort required to reach it exacerbates her pain, making it difficult for her to carry out her banking tasks without considerable exhaustion and breathing difficulties.
- 174.2. Lack of Space for Maneuvering in the Branch: Additionally, Mrs. Colón faced difficulties when trying to approach the counter directly due to insufficient depth for maneuvering with her motorized wheelchair. The design limitations of the counter prevent her from getting close safely, forcing her to make uncomfortable and sometimes dangerous maneuvers. The layout of the counter in the branch does not provide clear and safe access, increasing the risk of collisions, which endangers her safety.
- 174.3. To address the mentioned barriers, the existing counters at the branch should be adjusted to comply with ADA regulations. This involves including a counter

section with a maximum height of 36 inches, allowing Mrs. Colón to comfortably access the counter from her motorized wheelchair without needing to stretch or rely on assistance. A preferential area could also be designated within the branch, with counters specifically designed for customers with mobility challenges, featuring the appropriate height, sufficient space, and accessible features, ensuring a more accessible and independent service for Mrs. Colón.

175. Mrs. Mirta Colón, a regular customer of Banco Popular, has been considering visiting the Branch San Francisco for some time. This location is convenient for her, as it is situated in the San Francisco Shopping Center, an area she frequently visits for errands and shopping. The branch's location enables her to take care of her banking needs while managing her other tasks, saving time and reducing the need for additional trips. However, despite these advantages, Mrs. Colón has not visited the branch, as she is aware of certain architectural barriers that have discouraged her from doing so. Since October 2024, she has recognized the challenges she would face in visiting due to the following reasons:

- 175.1. Difficulties Accessing the Counter: Mrs. Mirta Colón is aware of the significant challenges she faces when trying to access the counter at the branch due to its height, which is completely inaccessible while seated in her motorized wheelchair and using portable oxygen. Her medical conditions, such as severe arthritis, COPD, and venous thrombosis, force her to make strained movements, which not only cause discomfort but can also worsen her health. The effort required to stretch and reach the counter causes pain, increases her fatigue, and puts unnecessary stress on her body. This barrier not only makes her feel frustrated but

also puts her at risk of suffering additional complications related to her conditions, such as increased joint pain or the potential worsening of her thrombosis. This discourages her from visiting the branch.

175.2. Lack of Counter Depth: The lack of adequate depth at the counters is another obstacle Mrs. Colón faces at the branch. The limited space at the base of the counter prevents her from approaching comfortably, forcing her to make uncomfortable adjustments that affect her stability. This situation not only causes her discomfort but also increases the risk of falls or movements that could further damage her arthritis-affected joints. The lack of a stable and proper posture puts her at risk, as the physical strain caused by these movements can lead to inflammation, intense pain, and increase the risk of complications from her venous thrombosis. This barrier not only discourages her from visiting the branch but also makes her feel insecure and fearful of the potential negative effects on her health.

175.3. In order to improve Mrs. Mirta's experience at the Branch San Francisco, several measures are suggested. First, the counter height could be adjusted to include a lower section that facilitates her access and allows her to interact independently, without requiring assistance for her transactions. Another option is to use adjustable-height counters, which would tailor the service station to Mrs. Mirta's specific needs, providing a more accessible and comfortable experience. Finally, the design of the counter base could be modified to ensure there is enough space for Mrs. Mirta approaches safely with her scooter, thus guaranteeing unobstructed

access. Mrs. Mirta understands that once these barriers are removed, she can feel comfortable and confident visiting the branch.

176. Mrs. Mirta Colón, a loyal customer of Banco Popular, has been considering visiting the Branch Condado Gallery due to its proximity to Wendy's, her favorite hamburger spot, well known for its fresh meat and unmatched burger flavor. The branch is conveniently located just 8 minutes by car from her home, making it a practical option for handling her banking transactions before enjoying a meal at Wendy's. However, despite these favorable factors, Mrs. Colón has not yet visited the Branch Condado Gallery. She is aware of certain obstacles that could prevent her from having a smooth and independent experience at the location, which has deterred her from going since December 2024.

176.1. High Counter Height: Mrs. Mirta Colón is aware that the counters at the Condado Gallery branch are too high, making it difficult for her to access them comfortably. Due to her severe arthritis, which causes pain and stiffness in her joints, and her diabetic neuropathy, which affects the sensitivity in her limbs, she finds it challenging to lean or stretch to interact with the counter. Additionally, the use of her motorized wheelchair limits her ability to elevate or approach the counter properly, forcing her to rely on the assistance of others to complete her transactions. This barrier directly affects her independence, as she cannot interact with the staff on her own, which discourages her from visiting the branch.

176.2. No Frontal Access to Counters: Mrs. Mirta Colón is aware that the counters at the Condado Gallery branch do not allow for frontal access, which further complicates her experience at the branch. Her motorized wheelchair and portable oxygen restrict her maneuverability, and due to her COPD and venous

thrombosis, moving laterally or in tight spaces is extremely difficult for her. The lack of frontal access makes it even harder for her to approach the counter, creating a significant physical barrier. These difficulties affect her ability to conduct banking transactions independently and make her feel uncomfortable and frustrated, as she has to rely on others to overcome these obstacles. Consequently, she is deterred from visiting the branch.

176.3. To resolve the barriers faced by Mrs. Mirta Colón at the Branch Condado Gallery, it is essential to tackle the physical obstacles that affect her mobility and independence. An effective solution is to adjust the counter height to make it accessible from a motorized wheelchair, allowing Mrs. Mirta to interact more comfortably without needing assistance from others. Additionally, rather than only modifying the height, the installation of counters with a lower section specifically designed for users with reduced mobility could be considered, making frontal access easier and obstacle-free. Furthermore, the depth of the counter could be improved by ensuring there is enough space for her wheelchair to approach without obstruction, allowing easy access with both the wheelchair and portable oxygen. If these barriers are overcome, Mrs. Mirta is delighted to visit the branch.

177. Mrs. Mirta, a regular customer of Banco Popular, is eager to visit the Branch Walmart Pda 18 for several reasons. The convenience of having the branch located inside Walmart is a major factor, as she can easily combine her banking tasks with grocery shopping and other daily errands. This dual-purpose visit saves her time and effort. Additionally, Mirta appreciates the idea of handling her finances and picking up necessities in one trip, which

makes her life much easier. Beyond that, she also values the branch's proximity to her home, further adding to its appeal. Despite these clear advantages, Mrs. Colón has not yet visited the branch because, since October 2024, she is aware of certain architectural barriers that have prevented her from going.

- 177.1. Difficulties Due to the Counter Height: Mrs. Mirta Colón is aware of a significant obstacle when attempting to access the counter at the branch. Due to its height, it is impossible for her to interact independently while seated in her motorized wheelchair. Her medical conditions, such as severe arthritis and COPD, make movement and posture difficult, forcing her to rely on others to perform even the simplest tasks, such as signing documents or receiving services. This type of barrier not only causes discomfort but also increases her sense of vulnerability and dependence, leaving her feeling as though her autonomy is limited. For this reason, Mrs. Colón has been discouraged from visiting the branch.
- 177.2. Insufficient Space for Adequate Access: Mrs. Colón faces another challenge related to the lack of sufficient space at the base of the counter. The arrangement of the space does not allow her to approach comfortably with her motorized wheelchair, forcing her to make uncomfortable adjustments to position herself in front of the counter. These movements are not only physically taxing but also increase the risk of falls or exacerbating her pain and fatigue. The lack of space to move freely worsens her health conditions, such as the pain caused by venous thrombosis and the inflammation in her joints affected by arthritis. This barrier not only makes it difficult for her to complete her transactions but also makes her

feel insecure and fearful of jeopardizing her physical well-being, which ultimately discourages her from visiting the branch.

- 177.3. To overcome these barriers, one option would be to adjust the height of the counters to make them accessible for individuals using motorized wheelchairs, allowing Mrs. Mirta Colón to interact comfortably without relying on external assistance. Another possibility is to install counters with lower sections that facilitate frontal access, specifically designed for people with reduced mobility, providing enough space for her motorized wheelchair to approach without difficulty. Implementing these adjustments would significantly improve Mrs. Colón's experience, offering her greater autonomy and comfort, enabling her to finally visit the branch without issues.
178. Ms. Mirta Colón is a long-time client of Banco Popular, drawn to the institution's reliability, accessibility, and comprehensive range of financial services, which allow her to manage her accounts efficiently and securely. She values the personalized in-person service provided by the bank, as it ensures greater control, clarity, and confidence in handling her financial transactions. The Puerto Nuevo branch in San Juan, located near her residence, is particularly appealing to her because it offers a highly convenient option for conducting her banking needs without requiring extensive travel or logistical challenges. This branch represents the ideal choice for her, allowing her to maintain her financial independence while benefiting from the security and efficiency that Banco Popular consistently provides. However, despite her genuine desire to visit this branch, Ms. Colón feels dissuaded from doing so due to architectural barriers that directly prevent her from accessing the facility safely and comfortably, considering her mobility

limitations and reliance on a scooter. These barriers immediately affect her ability to receive banking services on equal terms, making it impossible for her to use the branch without unnecessary strain or physical discomfort. The barriers that Mrs. Colón are aware of are:

179. Accessible Counter Section Absent: Ms. Mirta Colon is aware that, despite the sophisticated design and modern aesthetic of the elegant blue and gray counter at the branch, it lacks an adapted section that is less than 36 inches in height. This barrier directly affects her, as interacting with an elevated surface forces her to extend herself inadequately, resulting in fatigue and joint pain, particularly due to her severe arthritis. The need to reach that height without the necessary support complicates her ability to maintain balance and hinders the handling of documents—a situation further aggravated by her reliance on a motorized wheelchair. She knows that this design flaw makes it impossible for her to conduct banking transactions independently and comfortably.
- 179.1. Lack of Extended Accessible Counter Surface: Ms. Colón is aware that, in addition to lacking an accessible section, the counters do not offer a surface area that extends to the full depth of the main counter. This design flaw affects her directly, as it prevents her from securely placing her documents and personal belongings while conducting her transactions. As a result, she is forced to manage objects with difficulty while leaning on her motorized wheelchair , compromising her stability and her ability to interact with bank personnel autonomously and without risk.
- 179.2. Lack of Adequate Knee Clearance Under the Counter: Ms. Mirta Colón is aware that the service counter at this branch lacks the necessary knee clearance,

preventing her from positioning her motorized wheelchair properly and accessing the counter comfortably. Due to her limited mobility caused by severe arthritis and diabetic neuropathy, she cannot extend her legs freely or maneuver easily when forced to remain in a constrained space. The absence of sufficient recessed space under the counter blocks her ability to move closer, forcing her to remain at an awkward distance where she struggles to reach documents, sign paperwork, or interact with bank staff effectively. This immediate restriction increases her discomfort and physical strain, as she must overextend her arms and adjust her posture unnaturally, aggravating her pain and fatigue. She feels dissuaded from visiting this branch because she knows that the lack of proper accessibility under the counter prevents her from conducting her banking transactions comfortably and independently.

- 179.3. The accessibility barriers identified at this Banco Popular branch Puerto Nuevo can be eliminated through structural modifications that ensure customers with disabilities receive equitable service. To address these issues, the service counter must be redesigned to incorporate an accessible section no higher than 36 inches, allowing Ms. Mirta Colón to comfortably reach the surface without straining or experiencing unnecessary fatigue. Additionally, an extended counter surface must be installed to enable customers using mobility devices to securely place their documents and belongings while conducting transactions, preventing instability and discomfort. The counter area must also be reconfigured to provide adequate knee clearance, allowing Ms. Colón to position her motorized wheelchair correctly and move closer without obstruction, minimizing strain on her arms and

reducing the risk of pain and fatigue caused by overextension. These modifications ensure she can interact with bank personnel efficiently, independently, and without unnecessary physical exertion, allowing her to visit the Banco Popular branch and manage her financial transactions with autonomy and dignity, in full compliance with the Americans with Disabilities Act (ADA).

180. Ms. Mirta Colon has placed her trust in Banco Popular, appreciating the institution's efficient account management, diverse and high-quality financial services, and the prestige of its personalized customer care. She particularly values the ability to conduct her transactions in person, as it provides her with greater security, autonomy, and control over her financial affairs. However, since October 2024, despite her strong preference for this branch, she feels dissuaded from visiting it after learning about accessibility barriers that directly prevent her from accessing the facility safely and comfortably, considering her mobility limitations and reliance on a scooter. These barriers immediately affect her ability to enter, move around, and complete her transactions independently, making it impossible for her to use the branch without unnecessary difficulty or discomfort. The barriers that Mrs. Colón are aware of are:

181. Counters Lacking an Adapted Section: Ms. Mirta Colon is aware that the branch counters do not feature an accessible section, specifically, a portion that is less than 36 inches in height, which allows her to interact comfortably from her motorized wheelchair. The absence of this adaptation forces her to overextend her arms and adjust her posture unnaturally, causing immediate strain, fatigue, and joint pain, particularly due to her severe arthritis. Without a properly designed counter, she lacks the support necessary to maintain stability, making the handling of documents more difficult and increasing the

physical effort required for routine transactions. She feels dissuaded from visiting this branch because the lack of an adapted section prevents her from completing her transactions without unnecessary discomfort.

181.1. Counter Surface: Ms. Mirta Colon is aware that, in addition to the absence of an accessible section, the counter does not provide a designated surface where she can safely place her documents and belongings while conducting transactions. As a result, she is forced to balance her paperwork on her lap or hold it in one hand while using the other to interact with bank staff, which compromises her stability and makes autonomous interaction increasingly difficult. Due to her cerebral palsy and limited dexterity, this additional challenge increases her discomfort and risk of dropping essential documents. She feels dissuaded from visiting this branch because the lack of an extended, accessible surface makes managing her financial transactions unnecessarily complicated and unsafe.

181.2. Lack of Adequate Recessed Space Under the Counter: Ms. Mirta Colon is aware that the service counter at this branch lacks the necessary recessed space underneath, preventing her from properly positioning herself and her motorized wheelchair for comfortable access. Due to her severe arthritis and diabetic neuropathy, she experiences limited mobility and difficulty adjusting her posture when forced to remain at a distance from the counter. The absence of sufficient clearance restricts her ability to move closer, forcing her to extend her arms unnaturally to reach documents, sign paperwork, or handle transactions. This immediate physical strain exacerbates her joint pain and fatigue, making the process unnecessarily difficult. Additionally, being unable to position herself

correctly affects her stability and balance, increasing the effort required to complete basic banking activities. She feels dissuaded from visiting this branch because the lack of proper accessibility under the counter prevents her from conducting her financial transactions with the independence and ease she requires.

181.3. The accessibility barriers at this Banco Popular branch Miramar can be removed through key structural improvements that ensure equitable and independent service for customers with disabilities. The service counter must be modified to include a section at a height of 36 inches or less, allowing Ms. Mirta Colon to interact comfortably without excessive strain or discomfort. Additionally, the counter surface must be extended to provide a stable and accessible area where she can place her documents and belongings securely while completing her transactions. Moreover, sufficient knee clearance must be incorporated beneath the counter, enabling her to position her wheelchair properly, move closer without obstruction, and engage with bank staff without experiencing physical strain or instability. Once these adjustments are implemented, Ms. Mirta Colon can visit this branch and manage her financial affairs safely, comfortably, and independently, in full compliance with the Americans with Disabilities Act (ADA).

182. Ms. Mirta Colón is a Banco Popular client, drawn to its extensive branch network, competitive financial products, and renowned commitment to high-quality personalized service. As a person with limited mobility, she values the ability to conduct her banking transactions in person, as it allows her to maintain direct control over her finances and receive service tailored to her needs. The Altamira Center branch is particularly

convenient due to its proximity to her residence, making it an ideal location for her to manage her finances without enduring long commutes that could further aggravate her health conditions.

183. However, despite her genuine desire to visit this branch, she feels dissuaded from doing so due to multiple accessibility barriers that immediately and directly impact her ability to enter, move around, and receive services on equal terms. Due to her medical conditions, including severe arthritis, COPD (chronic obstructive pulmonary disease), type 2 diabetes, hypertension, sleep apnea, venous thrombosis, and generalized diabetic neuropathy, Ms. Colón relies on a motorized wheelchair and portable oxygen at all times, making it essential for the branch to provide an accessible and obstacle-free environment. The accessibility barriers preventing her from visiting the branch are as follows:

184. Counters Lacking a Section Below 36 Inches: Ms. Mirta Colón is aware that the service counters at the Altamira Center branch do not include an accessible section below 36 inches, preventing her from comfortably and independently engaging with bank personnel from her motorized wheelchair. Due to her severe arthritis and diabetic neuropathy, extending her arms to reach an elevated surface causes immediate joint pain, fatigue, and difficulty holding documents securely. This barrier compromises her independence and privacy, as she must rely on others to complete basic transactions such as signing documents or handling cash. She feels dissuaded from visiting this branch because she cannot access banking services under the same conditions as other customers.

- 184.1. Counter Surface Lacking an Accessible Lower Extension: Ms. Mirta Colón is aware that, in addition to lacking an accessible section, the counter does not

provide an extended surface throughout its full depth, preventing her from securely placing her documents and belongings while conducting her transactions. Due to her muscle weakness and diabetic neuropathy, holding documents in her lap or in the air makes it difficult to manage her money properly and increases the risk of dropping important items. This barrier directly impacts her stability and independence, forcing her into uncomfortable maneuvers that compromise her safety. She feels dissuaded from visiting the branch because she cannot carry out her banking transactions practically and without excessive effort.

- 184.2. Lack of Adequate Recessed Space Under the Counter: Ms. Mirta Colón is aware that the service counter lacks adequate recessed space underneath, preventing her from properly positioning herself and her motorized wheelchair to approach the counter comfortably. Due to her COPD and sleep apnea, making additional physical efforts to reach the service area causes extreme fatigue and difficulty breathing, directly affecting her ability to complete her transactions without discomfort. The lack of sufficient clearance forces her to remain at an awkward distance, making it difficult for her to sign documents and interact efficiently with bank staff. She feels dissuaded from visiting this branch because she cannot position herself adequately to receive service without unnecessary obstacles.
- 184.3. The accessibility barriers identified at Banco Popular's Altamira Center branch can be eliminated through structural modifications that ensure customers with disabilities receive services on equal terms. To guarantee accessibility, it is essential to modify the service counter by incorporating a section at a height of 36 inches or less, allowing Ms. Mirta Colón to interact comfortably with bank staff

without unnecessary physical strain. Additionally, the counter surface must be extended to its full depth, ensuring she can place her documents and belongings securely and without difficulty. It is also crucial to create recessed space beneath the counter, allowing her motorized wheelchair to move closer without obstruction, ensuring a safer and more accessible experience. Once these solutions are implemented, Ms. Mirta Colón can visit the Altamira Center branch and conduct her financial transactions safely, comfortably, and independently, in full compliance with the Americans with Disabilities Act (ADA).

185. Ms. Mirta Colón is a Banco Popular client who has remained loyal to the institution due to its financial stability, efficient account management, and convenient banking services. She values the security and reliability that Banco Popular offers, as well as its accessible service channels, which allow her to handle her finances with ease. However, for her, conducting transactions in person is essential, as it enables her to maintain direct control over her accounts and receive immediate, personalized assistance.
186. Among all available branches, the San Juan Los Puertos Branch location is the most suitable for her needs, as it is only five minutes from her residence, allowing her to avoid long commutes that could negatively impact her health. Despite her strong desire to visit this branch, she feels dissuaded from doing so due to multiple accessibility barriers that prevent her from accessing, navigating, and receiving service without difficulty. Because of her health conditions Ms. Colón relies on a motorized wheelchair and portable oxygen at all times, making it crucial for the branch to provide a barrier-free environment that accommodates her mobility needs. The accessibility barriers preventing her from visiting this branch are as follows:

187. Counter Height Inaccessible for Wheelchair Users: Ms. Mirta Colón is aware that the service counter at the San Juan Los Puertos branch lacks an accessible section at a height of 36 inches or less, preventing her from comfortably approaching and conducting her transactions independently from her wheelchair. She is aware that the counter's light and dark brown color combination and elevated design, which, while visually distinctive, creates a significant physical barrier for her. The counter's height forces her to strain her posture and overextend her arms beyond her physical capabilities, causing immediate joint pain due to her severe arthritis and diabetic neuropathy. This lack of accessibility compromises her independence and privacy, as she must rely on bank personnel to complete transactions, despite being capable of doing so on her own. She feels dissuaded from visiting this branch because she cannot engage with banking services on equal terms.

187.1. Absence of a Functional Surface for Placing Documents and Personal Items: Ms. Mirta Colón has identified that, in addition to lacking an accessible section, the service counter does not provide an adequate surface for placing documents and personal belongings, making it impossible for her to securely position her items while completing transactions. Due to her muscle weakness and diabetic neuropathy, holding documents in her lap or balancing them in one hand while interacting with bank personnel is both impractical and uncomfortable. This deficiency disrupts her ability to organize her materials and increases the risk of dropping essential documents, adding unnecessary stress to her banking experience. She feels dissuaded from visiting this branch because she cannot efficiently and safely complete her transactions.

- 187.2. Inability to Approach the Counter Due to Lack of Clearance Below: Ms. Mirta Colón is aware that the service counter lacks recessed space underneath, preventing her from properly positioning her wheelchair for a comfortable interaction with bank personnel. The absence of sufficient clearance forces her to remain at an awkward distance from the service area, making it difficult for her to sign documents, submit checks, or receive assistance. Due to her COPD and sleep apnea, any additional effort required to compensate for this barrier causes severe fatigue and difficulty breathing, negatively affecting her ability to complete her transactions without discomfort. She feels dissuaded from visiting this branch because the restricted mobility within the service area prevents her from conducting her banking activities comfortably and safely.
- 187.3. The accessibility barriers at the San Juan Los Puertos branch of Banco Popular can be eliminated through structural modifications that ensure customers with disabilities receive service on equal terms. To improve accessibility, it is essential to modify the service counter by incorporating a section at a height of 36 inches or less, ensuring that Ms. Mirta Colón can comfortably interact with bank staff without unnecessary physical strain. Additionally, the counter surface must be extended, allowing her to securely place her documents and personal items without difficulty. It is also crucial to create recessed space beneath the counter, enabling her motorized wheelchair to move closer without restrictions, ensuring a safer and more accessible experience. Once these improvements are implemented, Ms. Mirta Colón can visit the San Juan Los Puertos branch and conduct her

banking transactions safely, comfortably, and independently, in full compliance with the Americans with Disabilities Act (ADA).

188. Ms. Mirta Colon is a frequent client of Banco Popular, having chosen this institution for its reliable financial services, diverse product offerings, and warm, personalized customer service. For her, conducting transactions in person is a priority, as it allows her to ensure security, maintain autonomy, and have direct control over her banking affairs. The Buchanan Branch, conveniently located just a few minutes from her residence, is an ideal option for her banking needs. However, despite her strong preference for this branch, she feels dissuaded from visiting due to multiple accessibility barriers that prevent her from interacting with the bank's services in a safe and independent manner. Due to severe arthritis, diabetic neuropathy, venous thrombosis, and COPD, Mrs. Colón experiences chronic pain, numbness, reduced strength in her extremities, and respiratory difficulties that require her to use portable oxygen at all times. These conditions make it impossible for her to walk or stand for even short periods, forcing her to rely on a motorized wheelchair for mobility. As a result, the existing accessibility barriers at the branch directly impact her, restricting her ability to access banking services on equal terms. The accessibility barriers preventing her from visiting the branch are as follows:

- 188.1. Lack of a Counter Section at an Accessible Height: Ms. Mirta Colon is aware that the service counter at the Buchanan Branch does not feature a section lower than 36 inches, making it difficult for her to access the service area comfortably and effectively from her scooter. The absence of a properly adapted area forces her to extend beyond her mobility limits, causing immediate fatigue and joint pain, which worsens due to her severe arthritis. The elevated height of the counter

hinders her ability to interact with bank personnel, compromising her independence and privacy by requiring assistance for basic tasks such as signing documents or handling money. She feels dissuaded from visiting this branch because this barrier prevents her from conducting her transactions effortlessly and comfortably.

188.2. Counter Surface Lacking a Functional Area for Handling Documents: Ms. Mirta Colon is aware that the counter lacks an extended lower surface, preventing her from placing her documents and personal belongings in a stable and secure manner. The absence of a functional surface forces her to rely solely on the elevated section of the counter, which does not accommodate her needs as a motorized wheelchair user. This limitation makes it difficult for her to organize her documents and manage her belongings, requiring her to balance them on her lap or hold them mid-air, which increases the risk of items falling and complicates her ability to complete banking transactions efficiently. She feels dissuaded from visiting this branch because she cannot conduct her transactions in an organized and obstacle-free manner.

188.3. Inadequate Space for Motorized Wheelchair Maneuverability: Ms. Mirta Colón is aware that the counter in this branch lacks sufficient depth in its lower portion, preventing her from finding a comfortable position on her wheelchair. This design shortfall forces her to adopt awkward maneuvers to properly align herself with the service area, as there is no accessible, low-depth zone beneath the counter. The need to compensate for this deficiency increases her fatigue and disrupts her balance, given her medical condition. Consequently, she feels dissuaded from

visiting this branch, since the inadequate counter depth restricts her ability to interact independently and complete her transactions efficiently.

188.4. The accessibility barriers at the Buchanan Branch of Banco Popular can be eliminated through structural modifications that ensure customers with disabilities receive services on equal terms. To guarantee accessibility, it is recommended to modify the service counter by incorporating a section at a height of no more than 36 inches, allowing Ms. Mirta Colón to comfortably access the surface without needing to overextend or strain her posture. Additionally, an extended lower surface must be incorporated into the counter, ensuring she can place her documents and personal belongings securely without difficulty. Furthermore, the area beneath the counter must be redesigned by removing any obstacles and expanding the accessible low-level work surface. This adjustment ensures that wheelchair users can position themselves comfortably to access the service area without overextending. Once these enhancements are implemented, Ms. Mirta Colón can visit the Buchanan Branch and conduct her banking transactions safely, comfortably, and independently.

189. Ms. Mirta Colón has placed her trust in Banco Popular, drawn to its refined atmosphere, high-quality customer service, and competitive financial and investment options. As someone who prefers to handle her banking affairs in person, she values the personalized attention and security that face-to-face interactions with bank staff provide. The San Juan branch is the ideal choice for her, as it is only three minutes from her residence, allowing her to complete her transactions quickly without having to endure long commutes that could worsen her health conditions. Despite the convenience of this location, she feels

dissuaded from visiting the branch due to multiple accessibility barriers that prevent her from moving freely and receiving services without difficulty. Given her physical limitations, it is crucial that the spaces she frequents be free of barriers that obstruct her ability to access services independently and comfortably. The accessibility barriers preventing her from visiting the branch are as follows:

190. Elevated Counter Design Without an Accessible Section: Ms. Mirta Colón is aware that the service counters at this branch, despite their sophisticated design and polished marble finish, do not include a section at a height of 36 inches or less, making it difficult for her to access the service area from her motorized wheelchair. The high counter limits her direct interaction with bank staff, as she cannot easily reach the surface, forcing her to overextend herself, which exacerbates her joint pain from severe arthritis and affects her stability. The absence of an accessible counter section compromises her independence, as she must rely on assistance for basic tasks such as signing documents or handling cash. She feels dissuaded from visiting this branch because she cannot access services on equal terms.

190.1. Lack of a Suitable Surface for Placing Documents and Belongings: Ms. Mirta Colón is aware that the branch counter does not provide an extended lower surface where she can place her documents and personal items securely, creating difficulties in organizing her banking transactions. The absence of an accessible area at a convenient height forces her to hold her documents in the air or on her lap, increasing the risk of dropping essential items and making it harder to manage her money properly. Given her muscle weakness and diabetic neuropathy, this added effort causes discomfort and unnecessary fatigue. She feels dissuaded

from visiting this branch because the lack of an adequate surface restricts her ability to complete transactions efficiently and without strain.

- 190.2. Lack of Clear Space in the Service Area: Ms. Mirta Colón is aware that the area underneath the counter does not provide sufficient clearance for her wheelchair to be positioned comfortably and without obstacles. This lack of an unobstructed low-level work area forces her to perform complex maneuvers just to align herself properly with the service space, compromising her stability and requiring extra effort that increases her fatigue. Due to her COPD and sleep apnea, any additional exertion exacerbates her breathing difficulties and imposes unnecessary physical strain. Consequently, she feels dissuaded from visiting this branch because the inadequate space underneath the counter prevents her from accessing banking services in a comfortable and independent manner.
- 190.3. The accessibility barriers at the San Juan branch of Banco Popular can be eliminated through structural modifications that ensure customers with disabilities receive services without restrictions. It is necessary to modify the service counter by incorporating a section at a height of 36 inches or less, allowing Ms. Mirta Colón to interact with staff without unnecessary strain or difficulty. Additionally, the counter surface must be expanded, ensuring she can place her documents and belongings securely and conveniently. It is also crucial to reconfigure the area under the counter, increasing maneuvering space so that customers using wheelchairs can access services without restrictions.. Once these improvements are implemented, Ms. Mirta Colón can visit the San Juan branch and conduct her

banking transactions safely, comfortably, and independently, in full compliance with the Americans with Disabilities Act (ADA).

Banco Popular's San Lorenzo Branch

191. Mrs. Bonnelis Cepeda, a Banco Popular client who frequents the Canóvas branch, is particularly interested in San Lorenzo due to her passion for Puerto Rican coffee culture and her desire to support local agriculture, especially through Hacienda Muñoz, one of the region's most iconic coffee plantations. Hacienda Muñoz has inspired Mrs. Cepeda to explore opportunities to promote sustainable coffee farming and create initiatives that benefit local farmers. Although she does not reside in San Lorenzo, she intends to manage her financial transactions at the Banco Popular San Lorenzo branch for her projects. However, since November 2024, she has been aware of certain barriers at the branch that have discouraged her from accessing its services, including:

191.1. High Counter. Mrs. Bonnelis Cepeda is aware that Banco Popular's service counter is set at a height that creates significant obstacles for her. Because she relies entirely on her left hand due to paralysis in her right arm, everyday banking tasks—such as signing documents, handling cash, or using the payment terminal—become unnecessarily difficult. The counter's excessive height forces her to twist or bend awkwardly to reach, increasing the likelihood of dropping items and making transactions physically exhausting. This setup slows down the process and prevents her from handling her banking needs efficiently.

191.2. Difficult-to-Reach Payment Terminals and Writing Areas. She is also aware that the payment terminals and writing surfaces are fixed in place or positioned too high, making them practically unusable for her. Without the ability to stabilize

documents with her right hand, inserting a card, signing forms, or managing paperwork becomes a frustrating challenge. The lack of accessible accommodations forces her to adopt awkward and ineffective workarounds, turning a simple bank visit into a stressful and inefficient task.

- 191.3. These barriers can be easily resolved by lowering a section of the service counter and providing adjustable or more accessible payment terminals and writing surfaces. A counter at an appropriate height allows Mrs. Bonnelis Cepeda to fill out documents, handle cash, and use the payment terminal without difficulty, while repositioned or movable writing surfaces enable her to complete tasks independently. These improvements make her banking experience more efficient and comfortable, motivating her to visit the San Lorenzo branch and confidently handle her financial needs.

Banco Popular's San Sebastián Branch

192. Mr. Walberto, a Banco Popular client, is particularly interested in visiting San Sebastián, Puerto Rico, due to his deep appreciation for museums and history. Despite residing outside the region, he is drawn to the town's rich cultural heritage, exemplified by attractions such as the Casa Doña Bisa Museum, which offers insights into early 20th-century life, and the Museo de la Hamaca, dedicated to the art of hammock weaving. His enthusiasm for exploring these historical sites motivates him to utilize the Banco Popular branch in San Sebastián for his financial needs during his visits. Mr. Walberto has always been satisfied with the excellent service provided by Banco Popular, which he finds reliable and accommodating to his needs as a client. The San Sebastián branch is particularly appealing to him because it offers accessible services, including

parking spaces for wheelchair users, however, since December 2024, he is aware of some architectural barriers that have discouraged him from using its services. These barriers include:

- 192.1. Inaccessible Counter Height. Mr. Walberto Hernández has noted that the service counter at Banco Popular is positioned at an impractical height, creating significant challenges for him when attempting to conduct banking activities or communicate with staff from his wheelchair. As someone living with spina bifida and dependent on a wheelchair for mobility, the counter's elevated height requires him to overextend himself, leading to physical discomfort and fatigue. This design flaw restricts his ability to access banking services independently and deters him from visiting this branch, as even routine transactions demand considerable effort or external assistance.
- 192.2. Insufficient Space Under the Counter. Mr. Walberto Hernández has also observed that the service counter does not provide adequate space beneath it for his wheelchair, making it impossible for him to approach it directly from the front. Because of his spina bifida and hydrocephalus, which affect his mobility and upper body strength, he is compelled to sit at an angle or sideways to perform transactions. This unnatural posture not only leads to physical discomfort but also aggravates his chronic back problems, hindering his ability to communicate with bank staff effectively and with the respect he deserves. As a result, the lack of knee clearance creates unnecessary frustration and discomfort during his banking experience.

192.3. These barriers could be easily resolved by lowering the counter height or providing a designated accessible service area with a lower counter, allowing Mr. Walberto to interact comfortably with bank staff and complete transactions independently. Additionally, ensuring adequate knee clearance beneath the counter enables him to approach it directly in his wheelchair, reducing strain and improving his overall banking experience at this branch.

Banco Popular's Santa Isabel Branch

193. Mr. Uriel Sepulveda has developed a keen interest in Santa Isabel due to his passion for community theater. The town boasts a vibrant local arts scene, with residents actively participating in cultural events and performances. Although he has never been to Santa Isabel, he intends to explore the town and collaborate with local theater groups, contributing his experience and enjoying the creative exchange. As part of his engagement with the community, he is exploring the option of managing his financial affairs at the Banco Popular branch in Santa Isabel. However, since November 2024, he has been aware of certain barriers at the branch that have discouraged him from accessing its services and becoming a client. These barriers are the following:

193.1. Inaccessible Counter Height. Mr. Uriel Sepulveda has observed that the counter at the Banco Popular branch in Santa Isabel is positioned at a height that is challenging for him to reach while using his walker. Due to his chronic osteoarthritis and lumbar disc damage, which limit his ability to stand for long periods or extend his arms comfortably, he experiences difficulty when signing documents or handling cash without assistance. This limitation forces him to

depend on others for routine banking tasks, making his visits to the branch inconvenient and discouraging independent access.

193.2. Lack of Counter depth. Mr. Sepulveda has also noted that the counter does not provide sufficient space for him to approach it directly while using his walker. His bilateral cervical and lumbar radiculopathy, which causes pain and restricts movement, requires him to maneuver uncomfortably or stretch awkwardly to complete transactions. The lack of adequate space results in physical discomfort and makes the banking experience inefficient, further deterring him from using the branch's services.

193.3. These barriers can be easily resolved by adjusting the counter height to a maximum of 34 inches and ensuring at least 27 inches of clearance underneath. This enables Mr. Sepúlveda to position himself properly, maintain a comfortable posture, and complete his transactions without unnecessary strain, making his banking experience more accessible and efficient, which motivates him to become a client.

Banco Popular's Toa Alta Branch

194. Mr. Walberto Hernández Reyes, a client of Banco Popular, wishes to visit the Toa Alta branch to manage his financial affairs directly and enjoy the independence of conducting his transactions in person. His interest in visiting this branch stems from the significance of the Toa Alta area to him, as it allows him to combine his banking needs with the opportunity to visit Lago La Plata, a natural environment he values for the tranquility and well-being it provides. Additionally, he is drawn to the proximity of Aníbal BBQ, a restaurant he enjoys. However, despite his genuine desire to visit this branch, he feels

discouraged due to multiple accessibility barriers that make it difficult for him to enter, move around, and receive services in a dignified and independent manner. These barriers immediately impact his experience, as his medical conditions require him to use a wheelchair. The barriers affecting him are as follows:

195. Inaccessible Counter: Mr. Walberto Hernández is aware that the counter at Banco Popular's Toa Alta branch does not include a section positioned at or below 36 inches in height, preventing him from comfortably interacting with bank staff from his wheelchair. This barrier forces him to exert excessive effort to reach the surface, causing fatigue and pain, which exacerbate his mobility issues. Additionally, the extra strain may pose a risk to his stability, given that he has spina bifida and other medical conditions that affect his strength and endurance. He feels discouraged from visiting the branch because he knows that, if he attempts to do so, he will face unnecessary difficulties in accessing the same services as other customers.

- 195.1. Lack of an Adequate Surface for Placing Documents: Mr. Hernández is aware that the counter lacks a sufficiently deep accessible surface, making it difficult for him to place his documents and personal belongings securely while conducting transactions. Due to this barrier, he is forced to hold his papers in the air or make uncomfortable maneuvers to complete his banking tasks, increasing his stress and the risk of dropping important documents. This situation is particularly problematic given his physical limitations, as retrieving objects from the floor without compromising his stability is challenging. He feels discouraged from visiting the branch because he cannot carry out his transactions with the autonomy and comfort he needs.

- 195.2. Restricted Access of the Counter: Mr. Hernández is aware that the space beneath the counter lacks sufficient depth to allow his wheelchair to position itself properly without obstructions. This barrier restricts his ability to approach the service area directly, forcing him to maneuver in a confined space, which is uncomfortable and challenging due to his limited mobility.
196. These barriers can be eliminated through structural modifications and adjustments to the service area. The bank should incorporate an accessible counter section no higher than 36 inches, extending continuously to ensure that Mr. Walberto Hernández Reyes can reach the surface to sign documents and manage his transactions. Additionally, the space beneath the counter should be reconfigured to allow clear, unobstructed access. Once these solutions are implemented, Mr. Walberto Hernández will be able to visit the branch and experience an accessible and equitable banking service, in compliance with the ADA.

Banco Popular's Toa Baja Branches

197. Mr. Walberto Hernandez, a Banco Popular client, wants to visit the Levittown branch to manage his banking transactions independently and take advantage of the convenience of receiving in-person service. His interest in visiting this branch arises not only from the efficiency of Banco Popular's services but also because the area where it is located is particularly appealing to him. The proximity to Isla de Cabras, a destination that allows him to enjoy the outdoors, the sea breeze, and the serenity of a natural environment, motivates him to travel to this area. For him, combining his banking needs with the opportunity to connect with nature is a significant advantage. However, despite his genuine desire to visit this branch, he feels dissuaded from doing so due to multiple accessibility barriers of which he is aware, which directly affect his ability to receive

services without restrictions. These barriers immediately impact his experience, as his health conditions require him to use a wheelchair to get around. The barriers he is aware of are as follows:

198. Inadequate Height of the Service Counter: Mr. Hernandez is aware that the customer service counter at the Levittown branch is too high, preventing him from comfortably and efficiently reaching the surface from his wheelchair. The lack of a section adapted to an accessible height forces him to overextend himself, which causes immediate pain and physical exhaustion, restricting his ability to interact with bank personnel autonomously. He feels dissuaded from visiting this branch because he knows he faces difficulties in receiving the same services that other customers access without obstacles.
- 198.1. Lack of Functional Space for Placing Documents and Belongings: Ms. Hernandez is aware that the service area does not provide a suitable surface where he can place his documents, checks, or personal items while conducting his transactions. Due to this barrier, he is forced to hold them in his lap or in the air, increasing his discomfort and the risk of dropping his belongings. This limitation directly affects his safety and efficiency when handling his banking matters.
- 198.2. Difficulties in Approaching the Service Counter: Mr. Hernandez is aware that the counter lacks adequate depth for access, preventing him from positioning his wheelchair properly to receive service. The absence of this restricts his mobility and forces him to make uncomfortable maneuvers to find a position where she can be attended to. He hesitates to visit this branch because he is aware of the challenges he encounters in obtaining the same services that other customers receive without hindrance.

199. These barriers can be eliminated through structural modifications and adjustments to the service area. The bank should incorporate an accessible counter section no higher than 36 inches, extending continuously to ensure that Mr. Walberto Hernández Reyes can reach the surface to sign documents and manage his transactions. Additionally, the space beneath the counter should be reconfigured to allow clear, unobstructed access. Once these solutions are implemented, Mr. Walberto Hernández Reyes will be able to visit the branch and experience an accessible and equitable banking service, in compliance with the ADA.
200. Mr. Walberto Hernández, a client of Banco Popular, wishes to visit the Toa Baja branch to personally manage his financial affairs and conduct his transactions independently. He values the ability to handle his banking needs in person rather than relying on digital or remote alternatives. Additionally, he appreciates the location of this branch due to its proximity to Isla de Cabras, a place he enjoys visiting for its peaceful environment and natural beauty. For Mr. Hernández, a trip to the bank is not just about finances—it is also an opportunity to engage with his surroundings and enjoy an accessible public space. However, despite his strong desire to visit the branch, significant accessibility barriers prevent him from doing so comfortably and independently. As a wheelchair user, these obstacles present challenges that restrict his ability to enter, maneuver within the space, and receive services on equal terms with other customers.
201. Counter Design That Does Not Accommodate Mobility Wheelchair: Mr. Hernández has observed that the customer service counter at the Toa Baja branch does not include a lowered section designed for wheelchair accessibility. As a result, he is unable to comfortably reach the counter's surface to complete transactions. The current design

forces him to extend his arms awkwardly, leading to discomfort and fatigue. Additionally, the increased effort required to access the counter may compromise his stability, creating a risk of strain or injury. Given these difficulties, he feels discouraged from visiting the branch, knowing that the experience would be unnecessarily complicated.

- 201.1. Lack of an Area to Place Documents and Personal Belongings: Another significant issue is the absence of an accessible area where he can place his documents and personal items while conducting transactions. Without a designated space, he is forced to hold papers and other belongings throughout the process, making it difficult to manage money, sign documents, and keep his affairs organized. This challenge not only creates inconvenience but also increases the risk of dropping important documents, which would be difficult for him to retrieve independently.
- 201.2. Limited Space for Positioning in Front of the Counter: Mr. Hernández Reyes has also noted that the area beneath the counter does not provide enough clearance for a wheelchair to fit comfortably. The lack of adequate space prevents him from positioning himself directly in front of the counter, forcing him to maneuver in an awkward and uncomfortable manner. This limitation makes it difficult for him to interact with bank personnel and complete his transactions with ease. position herself properly to receive service in a dignified and equitable manner.
- 201.3. To ensure an inclusive banking experience, Banco Popular should implement structural modifications at the Toa Baja branch to eliminate these barriers. The customer service counter should include a designated accessible section that does not exceed 36 inches in height, allowing Mr. Hernández to reach the surface

comfortably. Additionally, the installation of a functional document placement area would significantly improve convenience and efficiency for customers with mobility impairments. Lastly, the space beneath the counter should be redesigned to provide sufficient clearance for wheelchair users, enabling them to approach the counter without obstruction. By making these necessary adjustments, Banco Popular can ensure that Mr. Walberto Hernández—and all customers with mobility disabilities—can access banking services independently, comfortably, and with dignity, in full compliance with the Americans with Disabilities Act (ADA).

Banco Popular's Trujillo Alto Branches

202. Mr. David Figueroa, who has quadriplegia and relies on a wheelchair for mobility, has developed a keen interest in visiting Trujillo Alto, a laid-back town near San Juan known for its friendly community and rich traditions. He is particularly drawn to the town's popular celebrations and culinary experiences, which align with his passion for cultural exploration. During his planned visit, Mr. Figueroa intends to manage his financial needs through the Banco Popular **Trujillo Alto Pueblo** branch. The bank's reputation for excellent customer service and convenient digital banking tools make it an ideal choice for handling his transactions seamlessly. However, since November 2024, he is aware of certain barriers at the branch that have discouraged him from accessing its services:

202.1. **High Service Counters.** Mr. David Figueroa is aware that the service counters at Banco Popular in Trujillo Alto are excessively high for him to use with ease. Since he depends entirely on his wheelchair for movement, the elevated design makes it difficult for him to access paperwork, manage money, or operate the card

reader without inconvenience. This restriction forces him to overextend himself, making transactions unnecessarily strenuous and requiring assistance for tasks he otherwise completes on his own.

202.2. Lack of Clearance Beneath the Counter. Mr. David Figueroa is aware that the service counters at Banco Popular in Trujillo Alto lack sufficient open space underneath for direct wheelchair access. Because he is unable to stand or shift forward to compensate, this absence of clearance stops him from positioning himself properly to carry out transactions. As a result, he must approach the counter at an awkward angle, making it difficult to sign forms, insert his card, or handle banking procedures without depending on others.

202.3. These barriers can be effectively resolved through the following measures: Lowering the service counters to an accessible height and ensuring at least 27 inches of clearance underneath allows Mr. David Figueroa to position his wheelchair properly and conduct transactions without unnecessary difficulty. A counter height of no more than 34 inches enables him to reach documents, manage payments, and use banking devices independently. Additionally, providing an open space beneath the counter allows for a direct, comfortable approach, eliminating the need for awkward positioning or external assistance. These adjustments create a more inclusive banking experience, making it easier for him to handle his financial matters autonomously and encouraging him to access the branch services.

203. Mr. David Figueroa considers the Banco Popular branch at Trujillo Alto Shopping Center a convenient option due to its proximity to key locations he frequents. Notably, the

Bicentenary Walkway, featuring the historic steel bridge commemorating the city's 200th anniversary, and the Luis Muñoz Marín Foundation, which includes a museum, historic archive, and park, are both accessible from this branch. The branch's proximity to these sites makes it an ideal choice for Mr. Figueroa to handle his banking transactions during his visit. However, since November 2024, he is also aware of certain barriers at the branch that have discouraged him from accessing its services:

- 203.1. Elevated Service Counters. Mr. David Figueroa is aware that the service counters at Banco Popular in Trujillo Alto Shopping Center are set at a height that makes them impractical for him. As he relies entirely on his wheelchair for mobility, the counter's elevated structure prevents him from easily accessing paperwork, managing transactions, or using the card terminal comfortably. This design forces him to stretch uncomfortably, making routine banking tasks unnecessarily difficult and often requiring assistance for actions he typically handles independently.
- 203.2. Insufficient Space Beneath the Counter. Mr. David Figueroa is aware that the service counters at Banco Popular in Trujillo Alto Shopping Center do not provide adequate open space underneath to accommodate a wheelchair. Since he cannot stand or shift forward to adjust, the lack of clearance hinders his ability to position himself correctly for transactions. This limitation forces him to approach from the side, making it challenging to sign documents, insert his card, or complete essential banking tasks without relying on help.
- 203.3. These barriers can be readily addressed through the following adjustments:
Implementing a designated accessible service area with a counter designed

specifically for wheelchair users provides an effective solution. This area should feature a lower counter height, ample knee clearance, and easy access to payment terminals and paperwork. A well-marked and consistently available space ensures that Mr. David Figueroa can complete his transactions independently and efficiently without unnecessary strain. By offering this dedicated service option, the bank not only improves accessibility but also creates a welcoming environment that encourages Mr. Figueroa to visit the branch and manage his banking needs with confidence.

Banco Popular's Utuado Branch

204. Mr. Walberto intends to visit the Branch Utuado because, although he doesn't live in the area, he is aware of the wonderful vacation homes there. As a client of the bank and someone who trusts the services it offers, he values the proximity of the branch to those vacation homes. The branch is convenient and accessible for carrying out banking tasks or inquiries, which allows him to resolve any banking issues quickly and efficiently, strengthening his intention to visit it whenever he has the opportunity. Since December 2024, Mr. Walberto has been discouraged from going to the Branch Utuado because he is aware of the architectural barriers present at the location that make it difficult for him to access the branch:

204.1. Elevated Counter: Mr. Walberto is aware that the counter at the Branch Utuado is positioned too high for him to access comfortably from his wheelchair. His spina bifida, along with other health issues such as kidney damage and epilepsy, prevent him from approaching the counter directly. This creates a significant obstacle, causing physical discomfort and additional effort as he must exert considerable

force to reach it, exacerbating his fatigue and pain. As a result, he has been discouraged from visiting the branch.

204.2. Lack of Depth for Frontal Access: Mr. Walberto also notices that the counter lacks sufficient depth for him to approach properly with his wheelchair, which further discourages him from visiting the branch. The insufficient space forces him to maneuver at uncomfortable angles, adding extra pressure on his body. Given his spina bifida and hypertension, this barrier prevents him from carrying out his banking tasks independently.

204.3. To address these barriers, the installation of an accessible counter, lower and with sufficient depth to allow frontal access for Mr. Walberto, could be considered. With these modifications in place, Mr. Walberto can carry out his banking tasks comfortably and independently. Once these barriers are resolved, he feels much more comfortable and confident in visiting the Branch Utuado and taking advantage of the services Banco Popular offers.

Banco Popular's Vega Alta Branch

205. Mr. Walberto is interested in visiting the Branch Vega Alta because, although he does not live in the area, he knows that Playa Cerromar is a must-visit destination due to its ideal location in a quiet and accessible area, but less crowded compared to others. Since the branch is close to the beach, it is very convenient for him to carry out his banking transactions there. Additionally, as a bank customer, he values the quality of services and personalized attention the bank offers, which makes him prefer visiting this branch for any banking matters he needs in the area, ensuring that his tasks are handled efficiently and quickly. However, since December 2024, Mr. Walberto has been discouraged from

visiting the Branch Vega Alta due to the architectural barriers present at the branch, which make him feel limited and even discriminated against. The barriers are as follows:

- 205.1. Counter: Mr. Walberto is aware that the counter at the Branch Vega Alta is positioned too high, making it inaccessible to him. As a wheelchair user, he struggles to reach the counter from both the front and the sides, significantly limiting his ability to perform tasks independently. This height discrepancy prevents him from interacting with the bank's services smoothly and efficiently, causing frustration and discomfort that discourages him from visiting the location.
- 205.2. Limited Access Due to Counter Design: In addition to the height issue, Mr. Walberto also notices that the design of the counter at the Branch Vega Alta does not allow proper access with his wheelchair. The layout forces him to make uncomfortable maneuvers, requiring awkward adjustments to approach the counter. This limitation creates an additional barrier that prevents him from carrying out his banking tasks efficiently and independently, further discouraging him from visiting the branch.
- 205.3. A solution is to install an adjustable counter or incorporate an accessible service area at wheelchair height, with a counter no higher than 36 inches, which allows Mr. Walberto to access it comfortably and conduct his transactions independently. If possible, a special service space could be created for clients with reduced mobility, with a counter at the appropriate height and enough space for Mr. Walberto to approach without difficulties. If this architectural barrier is resolved, Mr. Walberto is confident he can visit the branch and handle his banking matters without any issues.

Banco Popular's Vega Baja Branch

206. Mr. Walberto, a loyal Banco Popular customer, has always felt a personal connection to the Branch Vega Baja, even though he doesn't live nearby. This branch holds sentimental value for him, as it is located in a place tied to many fond memories from his past, whether through family ties or past experiences in the area. It offers a sense of familiarity and comfort, making it a special location for him to conduct his banking. Given this emotional connection, he is particularly interested in using the branch for his banking needs. Yet, since November 2024, he has been reluctant to visit due to the awareness of certain architectural barriers that make his experience difficult, and he is concerned about facing discomfort or discrimination. These barriers are as follows:

206.1. Raised Counter: Mr. Walberto is aware that the counter at the Branch Vega Baja is positioned too high for him to reach comfortably. As a wheelchair user due to his spina bifida and other health conditions, this elevated counter presents a significant barrier because it prevents him from getting close enough to carry out his banking tasks independently. This not only makes the process more uncomfortable but also hinders the efficiency of his banking experience, which discourages him from visiting the branch.

206.2. Restricted Access to the Counter: In addition to the height issue, Mr. Walberto also realizes that the design of the counter at the Branch Vega Baja does not allow him to approach it directly from the front with his wheelchair. The layout forces him to make uncomfortable adjustments, such as having to turn his chair, which further complicates the interaction with the services. This lack of direct access further limits his independence and discourages him from visiting the branch.

206.3. To address the problem, a wheelchair-accessible counter could be installed, allowing Mr. Walberto to approach comfortably from a front access. This counter should be at an appropriate height and provide enough space for him to carry out his transactions independently, without needing to make uncomfortable movements or rely on others. Additionally, it would be ideal if the branch set up a special area for clients with reduced mobility to ensure a more comfortable and efficient service experience. If these architectural barriers are resolved, Mr. Walberto is confident that he can visit the Branch Vega Baja without issues and carry out his banking tasks autonomously.

Banco Popular's Villalba Branch

207. Mr. Uriel wishes to become a client of Banco Popular and is interested in visiting the Branch Villalba, as, although he does not reside in the area, its wonderful aquatic destinations attract his attention. The mentioned branch offers the flexibility to efficiently manage banking needs while providing all the required services. Since December 2024, Mr. Uriel has refrained from visiting the Branch Villalba because he is aware of the architectural barriers present at the location and knows that these access difficulties create challenges for his mobility:

207.1. Elevated Counter: Mr. Uriel has noticed that the counter at the Villalba Branch is positioned too high for him to use comfortably while relying on his walker. Due to his mobility challenges, including joint pain and back issues, he struggles to get close enough to the counter, which makes completing even simple banking tasks a painful experience. The height disparity forces him into uncomfortable positions, exacerbating his existing health conditions and leading to physical exhaustion. As

a result, he finds it difficult to manage his banking independently, and the discomfort makes him hesitant to visit the branch altogether.

207.2. Insufficient Space for Easy Access: Beyond the height of the counter, Mr. Uriel has observed that the space in front of it is insufficient to allow him to approach directly with his walker. The lack of adequate depth forces him to navigate around awkward angles and take longer routes, further complicating his attempts to complete transactions. This layout only adds to the frustration and diminishes his sense of autonomy, leading him to avoid visiting the branch.

207.3. To overcome the issue of the elevated counter at the Villalba Branch, one solution is to create an accessible counter that is lower or adjustable, catering specifically to customers with mobility difficulties, such as Mr. Uriel. A dedicated service area that accommodates his needs would provide a counter at an ideal height, allowing him to comfortably approach and interact with the bank staff while using his walker. Reducing the effort needed to get close to the counter greatly reduces the physical discomfort Mr. Uriel experiences and helps him perform his banking tasks more independently. Furthermore, ensuring there is enough space to approach the counter directly, without needing to navigate tight or uncomfortable angles, makes the process even smoother. Addressing these physical obstacles not only enhances Mr. Uriel's banking experience but also encourages him to visit the Villalba Branch with greater comfort and ease.

Banco Popular's Yabucoa Branch

208. Mr. Carlos Molina, a loyal customer of Banco Popular, has always considered Yabucoa as a special place. He views the town as a serene and relaxing environment, perfect for

combining leisure with practical activities like handling his banking needs. The peaceful surroundings of Yabucoa offer him the ideal atmosphere to unwind, and the idea of visiting the Branch Yabucoa Panorámica holds great appeal to him. For Mr. Molina, conducting his transactions in such a quiet setting is both efficient and enjoyable, making it an attractive option for his banking tasks. Unfortunately, since December 2024, Mr. Molina has been hesitant to visit the branch due to the architectural challenges he faces when trying to access the services. The concerns surrounding the infrastructure have left him feeling reluctant to visit, despite his genuine desire to be in Yabucoa, a place he holds dear. The following are the barriers that have led to his current hesitation:

- 208.1. Obstacle Due to Elevated Counter: Mr. Carlos Molina is aware that the counter at the Branch Yabucoa Panorámica is elevated, which makes it difficult for him to access it comfortably while using his wheelchair. Due to his condition, Muscular Dystrophy, which weakens his muscles, he finds it challenging to exert the additional effort needed to approach or reach the counter. This forces him to adopt uncomfortable postures, leading him to avoid visiting the branch to prevent increased discomfort and difficulty in efficiently completing his banking tasks.
- 208.2. Difficulty Accessing the Counter Directly: Additionally, Mr. Carlos Molina knows that the counter lacks sufficient depth to allow him to approach it directly with his wheelchair. This creates a significant challenge for him, as he must navigate tight spaces, making it harder to interact with the counter. The lack of space disrupts his autonomy, as he cannot approach the counter naturally, limiting his ability to manage his banking tasks without assistance from others and discouraging him from visiting the branch.

208.3. Mr. Carlos Molina knows that to be able to access the Branch Yabucoa Panoramica comfortably and efficiently manage his banking tasks, an adjustable counter should be installed at a maximum height of 36 inches from the floor so that he can approach it without difficulty, given his limitations from Muscular Dystrophy. In addition, expanding the depth of the counter allows him to approach it frontally with his wheelchair, improving his autonomy and avoiding the current discomfort of maneuvering in cramped spaces. Mr. Carlos is aware that once these barriers are resolved, he can visit the branch without issues.

Banco Popular's Yauco Branches

209. Mr. Uriel has been considering becoming a customer of Banco Popular, particularly interested in the Yauco Pueblo Branch. He finds the area appealing not only for its convenient location but also for its peaceful atmosphere, surrounded by mountains and lush greenery. For him, Yauco is a place where he can enjoy tranquility and natural beauty, making it the perfect spot to handle his banking needs without having to travel long distances. Being able to visit the branch while appreciating the serene environment of Yauco is an ideal combination. Since October 2024, though, Mr. Uriel has been hesitant to visit the Yauco Pueblo Branch because he is aware of the architectural barriers at the location. These obstacles have raised concerns about his ability to comfortably access the branch and complete his banking tasks without complications. The infrastructure limitations at the branch have been a significant deterrent, despite how convenient and attractive the location initially seemed. The barriers he has identified are as follows:

- 209.1. Challenges Posed by the High Counter: Mr. Uriel has noticed that the height of the counter at the Yauco Pueblo Branch creates a significant barrier for him. Given his spinal issues, including osteoporosis and chronic osteoarthritis, he struggles to reach the counter comfortably while using his walker. The elevated counter forces him to make additional physical efforts that exacerbate his back and joint pain. These physical challenges make the visit more uncomfortable and less manageable, ultimately deterring him from going to the branch.
- 209.2. Inconvenient Access to the Counter: Furthermore, Mr. Uriel recognizes that the layout of the counter at the Yauco Pueblo Branch does not provide enough space for him to move freely with his walker. This spatial limitation prevents him from directly approaching the counter and forces him to take awkward positions or maneuver in unnatural ways, which increases his discomfort. This lack of accessibility impacts his independence, as he is forced to rely on assistance from others for simple tasks. These difficulties further discourage him from considering the branch for his banking needs.
- 209.3. To overcome the challenges at the Yauco Plaza Branch, installing a counter with an adjustable height makes it much easier for Mr. Uriel to approach and use without straining himself. This adjustment helps minimize the physical exertion required, ultimately alleviating the discomfort and pain in his back and joints. Moreover, expanding the counter's depth creates more room for him to approach it directly with his walker, allowing him to position himself naturally. This change prevents awkward postures and reduces the unnecessary movement that exacerbates the pain in his spine and joints, promoting a more comfortable and

independent banking experience for him. With these modifications, Mr. Uriel is happy to become a client of the bank and carry out his banking transactions more comfortably and efficiently during the visits he plans to make to the branch, improving his autonomy and reducing physical discomfort.

210. Although Mr. Uriel does not live in Yauco, he wanted to visit the Branch Yauco Plaza due to its proximity to Ponce, his city of residence, as it is only a half-hour drive away. The location is particularly appealing to him, as in addition to its natural surroundings, Yauco is known for its peaceful and welcoming atmosphere, its mountainous landscape, lush vegetation, and the sense of tranquility it offers. The branch's proximity allows him to combine banking tasks with enjoying the city. Although Mr. Uriel wishes to become a Banco Popular client and tries to visit the Branch Yauco Plaza in November 2024, he is discouraged from doing so because he knows that the accessibility barriers at the branch make it difficult for him to access the location and affect his comfort while managing his banking needs. The barriers are as follows:

- 210.1. Difficulty with the Counter Height: Mr. Uriel knows that the counter at the Branch Yauco Plaza is positioned at a height that is inaccessible for him while using his walker. Due to his health condition, which includes osteoporosis and chronic osteoarthritis in his spine, he is forced to exert extra effort to approach the counter. This requires more physical exertion than he can manage, increasing discomfort and pain in his joints and back. As a result, Mr. Uriel prefers not to visit the branch to avoid these discomforts interfering with his experience.
- 210.2. Limited Access Due to Lack of Space at the Counter: Mr. Uriel also realizes that the Branch Yauco Plaza lacks adequate space to approach the counter with his

walker. The lack of counter depth prevents him from approaching it easily, forcing him to move in uncomfortable ways, which affects his ability to complete his banking tasks smoothly. This physical barrier not only increases his discomfort but also limits his autonomy, as he needs to rely on others to complete tasks that he normally does on his own. This prevents him from having an efficient banking experience and discourages him from visiting the branch.

210.3. To overcome the challenges at the Yauco Plaza Branch, installing a counter with an adjustable height would make it much easier for Mr. Uriel to approach and use without straining himself. This adjustment would help minimize the physical exertion required, ultimately alleviating the discomfort and pain in his back and joints. Moreover, expanding the counter's depth would create more room for him to approach it directly with his walker, allowing him to position himself naturally. This change would prevent awkward postures and reduce the unnecessary movement that exacerbates the pain in his spine and joints, promoting a more comfortable and independent banking experience for him. With these modifications, Mr. Uriel would be happy to become a client of the bank and carry out his banking transactions more comfortably and efficiently during the visits he plans to make to the branch, improving his autonomy and reducing physical discomfort.

211. As a result of Defendant's non-compliance with the ADA, Plaintiffs' ability to access and use Defendant's facilities has been significantly impeded.

212. Though Defendant has a centralized approach to managing and operating its facilities, it has failed to take corrective actions necessary to make its facilities fully accessible and independently usable by Plaintiff with a mobility disability.
213. Without injunctive relief, Plaintiff will continue to be unable to fully access Defendant's facilities in violation of his rights under the ADA.

D. The ADA and Its Implementing Regulations

214. On July 26, 1990, President George H.W. Bush signed into law the ADA, a comprehensive civil rights law prohibiting discrimination on the basis of disability.
215. The ADA broadly protects the rights of individuals with disabilities in employment, access to State and local government services, places of public accommodation, transportation, and other important areas of American life.
216. Title III of the ADA prohibits discrimination in the activities of places of public accommodation and requires places of public accommodation to comply with ADA standards and to be readily accessible to, and independently usable by, individuals with disabilities. 42 U.S.C. § 12181-89.
217. Defendant is required to remove existing architectural barriers when such removal is readily achievable for places of public accommodation that existed prior to January 26, 1992, 28 CFR 36.304(a) and 42 U.S.C. Section 12182(b)(2)(A)(iv); in the alternative, if there has been an alteration to Defendant's places of public accommodation since January 26, 1992, the Defendant is required to ensure to the maximum extent feasible, that the altered portions of the facilities are readily accessible to and useable by individuals with disabilities, including individuals who use wheelchairs, 28 CFR 36.402; and finally, if the Defendant's facilities were designed and constructed for first occupancy subsequent to

January 26, 1993, as defined in 28 CFR 36.401, then the Defendant's facilities must be readily accessible to and useable by individuals with disabilities as defined by the ADA.

218. Defendant's facilities are not fully accessible to, and independently usable by individuals who use wheelchairs.

219. While Defendant has a centralized approach to the design, construction, and maintenance of its facilities, it systematically and inadequately maintains architectural barriers at its counters. As a result, Defendant's facilities remain inaccessible and cannot be independently used by Plaintiff with a mobility disability.

220. The defendant is urged to implement the necessary adjustments to the counters of the establishment to comply with ADA accessibility standards for individuals with mobility disabilities. Adhering to these standards is crucial to ensure equal access and comfort for Plaintiffs, thereby preventing discrimination against them.

E. Substantive Violation

221. The allegations contained in the previous paragraphs are incorporated by reference.

222. Defendant's facilities were altered, designed, or constructed, after the effective date of the ADA.

223. Defendant's facilities were required to be altered, designed, and constructed so that they are readily accessible to and usable by individuals who use wheelchairs. 42 U.S.C. § 12183(a)(1).

224. The architectural barriers described above demonstrate that Defendant's facilities were not altered, designed, or constructed in a manner that makes them readily accessible to and usable by individuals with mobility disabilities.

225. The architectural barriers described above demonstrate that Defendant has failed to remove barriers, as required by 42 U.S.C. Section 12182(b)(2)(A)(iv).
226. Defendant's facilities are required to comply with the Department of Justice's 2010 Standards for Accessible Design, or in some cases the 1991 Standards 42 U.S.C. § 12183(a)(1); 28 C.F.R. § 36.406; 28 C.F.R., pt. 36, app. A.
227. Defendant is required to provide individuals with mobility disabilities full and equal enjoyment of its facilities. 42 U.S.C. § 12182(a).
228. Defendant has failed, and continues to, fail, to provide individuals who use wheelchairs with full and equal enjoyment of its facilities.
229. Defendant has discriminated against Plaintiffs by failing to make its facilities fully accessible to and independently usable by individuals with mobility disabilities, in violation of 42 U.S.C. § 12182(a), as described above.
230. Defendant's conduct is ongoing, and Plaintiffs have been harmed by Defendant's conduct.
231. Given that Defendant has failed to comply with the ADA's requirements to make its facilities fully accessible to and independently usable by individuals with mobility disabilities, Plaintiff invokes his statutory right to declaratory and injunctive relief, as well as costs and attorneys' fees.

F. Deliberate Discrimination: Banco Popular Denies Accessibility in Puerto Rico Despite Knowing the Law

232. Banco Popular de Puerto Rico, which operates under the name Popular Bank North America in other jurisdictions, has banking branches in multiple locations, including Florida. While its branches in Florida generally demonstrate greater compliance with ADA requirements—offering lower-height teller counters, some with greater depth for

improved accessibility for individuals using mobility devices—the branches in Puerto Rico fail to meet these same standards, despite the Bank’s clear knowledge of its legal obligations.

233. Some of Banco Popular locations in Florida include, but are not limited to:

233.1. Popular Bank North America - Skylake, Miami Gardens Branch, located at 1590 North East Miami Gardens Drive, North Miami Beach, FL 33179, with coordinates 25.94547695599384, -80.1686925585689.

233.2. Popular Bank North America - North Miami Branch, located at 13715 Biscayne Boulevard, North Miami, FL 33180, with coordinates 25.902697708294458, -80.15934312378931

233.3. Popular Bank North America - North Beach Branch, South Florida, located at 7306 Collins Ave Miami Beach, FL 33141, with coordinates 25.8587007263881, -80.12119011718318

234. The teller counters in these Banco Popular branches in Florida incorporate design elements that promote a more inclusive banking experience. They feature sections of varying heights, with some areas offering increased depth for better accessibility. Additionally, certain sections provide open space beneath the counter, allowing for closer and more comfortable interaction. The curved design of some counters further enhances accessibility by creating multiple points of approach, facilitating seamless customer service. These branches, among others in Florida, demonstrate the Bank’s ability to implement ADA-compliant solutions when it chooses to do so.

235. In contrast, Banco Popular operates numerous branches throughout Puerto Rico that do not meet the same accessibility standards as its locations in Florida. These branches, previously referenced in this complaint, include:

235.1. Banco Popular – Plaza Carolina (hereinafter Branch Plaza Carolina) located at Exp. Loiza, Salida Ave. Fragoso, Ruta 26, Carolina, PR 00983-0000, with coordinates 18.393061847367836, -65.97605438917095.

235.2. Banco Popular – Plaza Las Américas (hereinafter Branch Plaza Las Américas) located at 525.Ave Roosevelt, San Juan, PR 00918-0000, with coordinates 18.423358299740734, -66.07506268382946.

235.3. Banco Popular - El Mercado Plaza (hereinafter “Branch El Mercado Plaza”) Street 152 Km. 14.6, Bo. Cedro Arriba, Naranjito, PR 00719-0000, with coordinates 18.272546963053536, -66.27305947301383.

236. Unlike the Banco Popular branches in Florida, which incorporate design elements that enhance accessibility, the teller counters in these Puerto Rico branches—and others throughout the island—exceed 36 inches in height, with some reaching up to 49 inches, making them impossible to access for individuals using wheelchairs. These counters lack a lowered section and do not provide a surface area that allows for frontal access, forcing customers with mobility devices to rely on assistance rather than conducting transactions independently. These design deficiencies create significant barriers to accessibility, preventing individuals with disabilities from enjoying the same level of service and independence that Banco Popular has demonstrated it is capable of providing in its Florida locations.

237. Banco Popular has undertaken renovations in multiple branches across Puerto Rico, including the replacement and purchase of new teller counters. Despite having full knowledge of ADA accessibility requirements, the Bank has chosen to install counters that are too high and do not comply with the necessary standards for accessibility. Rather than making the necessary modifications to provide equal access, Banco Popular has continued to implement barriers that prevent individuals with disabilities from independently conducting their banking transactions.
238. In an apparent effort to create the illusion of compliance, the Bank has placed international disability symbols and signage designating specific lines for individuals with disabilities. However, these superficial measures fail to address the fundamental issue: the teller counters remain inaccessible. Simply designating a separate line does not eliminate the physical barriers that prevent individuals using mobility devices from accessing teller services in the same manner as other customers.
239. Banco Popular's installation of compliant teller counters in its Florida branches demonstrates the institution's clear awareness of ADA requirements. Despite this knowledge, the Bank has failed to implement similar accessible teller counters in its Puerto Rico branches, evidencing a pattern of intentional or willful neglect of the rights of individuals with disabilities.
240. This practice effectively results in the segregation of individuals with disabilities rather than ensuring their full and equal participation. By failing to provide accessible teller counters, Banco Popular forces individuals with disabilities to rely on alternative or special assistance rather than allowing them to conduct their transactions independently.

241. Banco Popular's disparate treatment of its Florida and Puerto Rico branches is not a matter of ignorance or oversight—it is a deliberate choice to disregard the rights of individuals with disabilities. The Bank has demonstrated its knowledge of ADA requirements through its implementation of accessible teller counters in Florida while simultaneously failing to provide similar accommodations in Puerto Rico. Instead of ensuring equal access, Banco Popular has prioritized superficial measures that do nothing to remove the physical barriers preventing individuals with mobility disabilities from independently conducting their banking transactions.

G. Discriminatory Practice of Using High and Shallow Counters: Accountability of Banco Popular de Puerto Rico

242. Violation of the ADA: Title III of the Americans with Disabilities Act (ADA) prohibits disability-based discrimination in places of public accommodation, including banks and financial institutions such as the branches of Banco Popular de Puerto Rico. The excessive height of transaction and customer service counters—exceeding 36 inches—along with the lack of sufficient depth, create architectural barriers that prevent or significantly hinder individuals with mobility impairments, such as the plaintiffs David Figueroa Betancourt, Mirta Colón Pellecier, Bonnelis Cepeda, Carlos Molina Román, Uriel Sepúlveda Alicea, and Walberto Hernández Reyes, from effectively accessing them. These conditions limit the plaintiffs' ability to conduct their banking transactions independently and with dignity, violating the principles of equal opportunity and access guaranteed by the ADA.

243. Noncompliance with Accessibility Guidelines: The ADA Accessibility Guidelines (ADAAG) establish specific requirements to ensure that individuals with disabilities can access facilities and services. One of these requirements is a maximum counter height of

36 inches. Additionally, the absence of lowered sections with sufficient depth further restricts access for individuals with mobility impairments, preventing them from conducting banking transactions independently. To comply with ADA standards, banks and financial institutions must provide accessible counters with appropriate height, adequate depth, knee clearance, and an unobstructed approach area. However, by failing to incorporate these measures, the defendant continues to deny equal access to individuals with disabilities, directly violating federal accessibility laws. Furthermore, by permitting and tolerating the systematic installation of inaccessible counters, as well as failing to establish clear procedures for their modification or removal, the defendant continues to perpetuate barriers to accessibility.

244. Disability Discrimination: The installation and continued use of inaccessible counters constitute a form of disability discrimination. By failing to provide an accessible means for the plaintiffs—David Figueroa Betancourt, Mirta Colón Pellecier, Bonnelis Cepeda, Carlos Molina Román, Uriel Sepúlveda Alicea, and Walberto Hernández Reyes—to interact with and utilize the counters, Banco Popular de Puerto Rico is denying them equal access and fair treatment. This creates unjust barriers, preventing them from fully and effectively participating in essential financial activities and reinforcing systemic exclusion.
245. Ongoing Modifications Without Accessibility Compliance: The defendant, Banco Popular de Puerto Rico, regularly modifies and maintains its counters to ensure their functionality and operability. However, in these modifications, the bank knowingly and deliberately omits its obligation to ensure that counters meet the ADA-mandated height requirement of 36 inches or lower. By failing to implement accessible counter designs,

Banco Popular continues to deny individuals with mobility impairments their right to equal access to banking services, in clear violation of federal disability laws.

H. Additional Causes Of Action

246. Count II. Violation Of The Puerto Rico Constitution's Provisions On Human Dignity And Equal Protection:

- 246.1. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.
- 246.2. Article II, Section 1 of the Constitution of the Commonwealth of Puerto Rico expressly provides that "the dignity of the human being is inviolable" and that "all men are equal before the law."
- 246.3. Article II, Section 7 of the Constitution of the Commonwealth of Puerto Rico guarantees that "[n]o discrimination shall be made on account of... physical or mental condition."
- 246.4. Defendant Banco Popular de Puerto Rico has violated these constitutionally protected rights by maintaining architectural barriers that discriminate against persons with physical disabilities, thereby violating their fundamental right to human dignity and equal protection under the law.
- 246.5. Defendant's widespread pattern of maintaining transaction and customer service counters at heights exceeding 36 inches and without adequate depth for proper frontal approach across its Puerto Rico branches demonstrates systematic disregard for the constitutional rights of persons with disabilities.
- 246.6. The constitutional violations against Plaintiffs are aggravated by Defendant's disparate treatment of disabled persons in Puerto Rico compared to those in Florida, where Defendant maintains ADA-compliant facilities.

246.7. As a direct result of Defendant's constitutional violations, Plaintiffs have suffered humiliation, degradation of their human dignity, unequal treatment, and denial of their constitutional rights to equal access and equal protection.

246.8. These constitutional violations entitle Plaintiffs to declaratory relief, injunctive relief, compensatory damages, and all other appropriate remedies available under Puerto Rico law.

247. Count II. Violation Of The Puerto Rico Constitution's Provisions On Human Dignity And Equal Protection:

247.1. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

247.2. Article II, Section 1 of the Constitution of the Commonwealth of Puerto Rico expressly provides that "the dignity of the human being is inviolable" and that "all men are equal before the law."

247.3. Article II, Section 7 of the Constitution of the Commonwealth of Puerto Rico guarantees that "[n]o discrimination shall be made on account of... physical or mental condition."

247.4. Defendant Banco Popular de Puerto Rico has violated these constitutionally protected rights by maintaining architectural barriers that discriminate against persons with physical disabilities, thereby violating their fundamental right to human dignity and equal protection under the law.

247.5. Defendant's widespread pattern of maintaining transaction and customer service counters at heights exceeding 36 inches and without adequate depth for proper

frontal approach across its Puerto Rico branches demonstrates systematic disregard for the constitutional rights of persons with disabilities.

247.6. The constitutional violations against Plaintiffs are aggravated by Defendant's disparate treatment of disabled persons in Puerto Rico compared to those in Florida, where Defendant maintains ADA-compliant facilities.

247.7. As a direct result of Defendant's constitutional violations, Plaintiffs have suffered humiliation, degradation of their human dignity, unequal treatment, and denial of their constitutional rights to equal access and equal protection.

247.8. These constitutional violations entitle Plaintiffs to declaratory relief, injunctive relief, compensatory damages, and all other appropriate remedies available under Puerto Rico law.

248. Count III. Violation Of The Fair Housing Act

248.1. Plaintiff Uriel Sepúlveda Alicea realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

248.2. The Fair Housing Act ("FHA"), 42 U.S.C. § 3601 et seq., prohibits discrimination on the basis of disability in the provision of services in connection with residential real estate transactions, including the making and purchasing of loans.

248.3. Banco Popular's mortgage departments, located within its branch locations in the Ponce area, provide services related to residential real estate transactions, including mortgage application processing, mortgage counseling, and loan servicing.

248.4. The inaccessible transaction and customer service counters at Banco Popular's Ponce-area branches, including but not limited to Branch Ponce El Monte, Branch

Ponce Rambla, Branch Centro del Sur Mall, Branch Plaza del Caribe, Branch Ponce Plaza, and Branch Ponce Towne Center Sur, effectively prevent Mr. Sepúlveda from accessing mortgage-related services on equal terms as individuals without disabilities.

248.5. The excessive height of counters exceeding 36 inches and the lack of sufficient depth for proper frontal approach constitute discriminatory barriers to accessibility that violate Section 804(f)(2) of the FHA, 42 U.S.C. § 3604(f)(2), which prohibits discrimination in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith.

248.6. These architectural barriers have prevented Mr. Sepúlveda from accessing mortgage-related services and counseling that could enable him to obtain housing, refinance existing housing, or modify loan terms.

248.7. As a direct result of Defendant's FHA violations, Mr. Sepúlveda has been denied equal access to housing-related financial services and has suffered damages including, but not limited to, frustration, humiliation, emotional distress, and denial of his federally protected right to equal housing opportunity.

249. Count IV. Violation Of The Equal Credit Opportunity Act

249.1. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

249.2. The Equal Credit Opportunity Act ("ECOA"), 15 U.S.C. § 1691 et seq., prohibits discrimination against credit applicants on the basis of disability.

- 249.3. Banco Popular de Puerto Rico is a creditor within the meaning of ECOA, 15 U.S.C. § 1691a(e), regularly extending, renewing, and continuing credit to consumers and businesses.
- 249.4. The transaction and customer service counters at Defendant's branches throughout Puerto Rico are utilized for credit-related services, including but not limited to credit card applications, personal loan applications, business loan applications, credit counseling, and loan servicing.
- 249.5. Defendant's maintenance of transaction and customer service counters at heights exceeding 36 inches and without sufficient depth for proper frontal approach effectively prevents Plaintiffs from applying for or accessing credit on equal terms as individuals without disabilities.
- 249.6. These architectural barriers constitute a pattern or practice of discrimination that violates ECOA, 15 U.S.C. § 1691(a)(1), by discriminating against Plaintiffs on the basis of their disabilities with respect to any aspect of a credit transaction.
- 249.7. Specifically:
- a. David Figueroa Betancourt has been prevented from independently completing credit card and personal loan applications at multiple branches including but not limited to Branch Los Colobos Shopping Center, Branch Carolina Highway, and Branch Plaza Carolina;
 - b. Mirta Colón Pellecier has been prevented from independently applying for and managing credit accounts at multiple branches including but not limited to Branch Caparra Center, Branch Mall of San Juan, and Branch Plaza Las Américas;

- c. Bonnelis Cepeda has been prevented from independently applying for and managing credit at multiple branches including but not limited to Branch Canóvanas Outlet and Branch Las Piedras;
- d. Carlos Molina Román has been prevented from independently applying for and managing credit at multiple branches including but not limited to Branch Aguas Buenas, Branch Aibonito, and Branch Cidra;
- e. Uriel Sepúlveda Alicea has been prevented from independently applying for and managing credit at multiple branches including but not limited to Branch Adjuntas, Branch Aguada, and Branch Añasco; and
- f. Walberto Hernández Reyes has been prevented from independently applying for and managing credit at multiple branches including but not limited to Branch Barranquitas, Branch Comerío, and Branch Lares.

249.8. Banco Popular's knowledge of the discriminatory effect of these architectural barriers is demonstrated by its implementation of accessible counters at its branches in Florida, showing that it had both knowledge of the legal requirements and the capability to provide accessible facilities but chose not to do so in Puerto Rico.

249.9. As a direct result of Defendant's ECOA violations, Plaintiffs have been denied equal access to credit opportunities and have suffered damages including, but not limited to, frustration, humiliation, emotional distress, and denial of their federally protected rights under ECOA.

250. Count V. Breach of Contract:

- 250.1. Plaintiffs David Figueroa Betancourt, Mirta Colón Pellecier, Bonnelis Cepeda, Carlos Molina Román, and Walberto Hernández Reyes (hereinafter "Account-Holder Plaintiffs") reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.
- 250.2. Account-Holder Plaintiffs have entered into contractual relationships with Banco Popular de Puerto Rico through their respective account agreements, establishing rights and responsibilities between the parties.
- 250.3. These account agreements explicitly and/or implicitly include provisions guaranteeing equal access to banking services and facilities to all customers without discrimination on the basis of disability.
- 250.4. Banco Popular's "Deposit Account Agreement and Disclosure" and other account documents incorporate by reference all applicable laws, including the ADA, which requires equal access to services for persons with disabilities.
- 250.5. By opening and maintaining these accounts, Banco Popular has expressly and impliedly promised to provide accessible banking services and facilities to Account-Holder Plaintiffs.
- 250.6. Banco Popular has breached these contractual obligations by failing to maintain accessible transaction and customer service counters, thereby preventing Account-Holder Plaintiffs from utilizing banking services on equal terms as customers without disabilities.
- 250.7. Specifically, by maintaining counters at heights exceeding 36 inches and without sufficient depth for proper frontal approach, Defendant has breached its contractual duty to provide accessible services to Account-Holder Plaintiffs.

250.8. As a direct result of Defendant's breach of contract, Account-Holder Plaintiffs have suffered damages including, but not limited to, inability to access contracted services, inconvenience, frustration, humiliation, and emotional distress.

250.9. Account-Holder Plaintiffs are entitled to all available remedies for breach of contract under Puerto Rico law, including specific performance, compensatory damages, and any other appropriate relief.

251. Count VI: Pattern Or Practice Of Discrimination

251.1. Plaintiffs reallege and incorporate by reference all preceding paragraphs as if fully set forth herein.

251.2. Banco Popular de Puerto Rico has engaged in a pattern or practice of intentional discrimination against persons with disabilities in Puerto Rico, in violation of Title III of the ADA, 42 U.S.C. § 12181 et seq.

251.3. Defendant maintains ADA-compliant transaction and customer service counters at its branches in Florida, including but not limited to:

- a. Popular Bank North America - Skylake, Miami Gardens Branch;
- b. Popular Bank North America - North Miami Branch; and
- c. Popular Bank North America - North Beach Branch.

251.4. Yet, simultaneously, Defendant fails to maintain similar ADA-compliant counters at its branches throughout Puerto Rico, despite operating under the same corporate umbrella and having knowledge of ADA requirements.

251.5. This disparate treatment constitutes intentional discrimination against persons with disabilities in Puerto Rico, treating them as second-class citizens compared to their counterparts in Florida.

- 251.6. During renovations and construction of new facilities in Puerto Rico, Defendant has consistently chosen to install non-compliant counters despite having demonstrated knowledge of accessibility requirements and the capability to install compliant counters, as evidenced by its Florida branches.
- 251.7. Defendant's superficial attempts at compliance, such as placing international disability symbols and designated accessible lines, while failing to address the fundamental architectural barriers at the counters, demonstrate a pattern of willful neglect.
- 251.8. This pattern or practice of discrimination is not isolated or inadvertent, but rather represents a systematic corporate policy or practice of disregarding the rights of individuals with disabilities specifically in Puerto Rico.
- 251.9. As a direct result of Defendant's pattern or practice of discrimination, Plaintiffs have suffered and continue to suffer discrimination, unequal treatment, and denial of their federally protected rights under the ADA.
- 251.10. This pattern or practice of intentional discrimination entitles Plaintiffs to enhanced injunctive relief, including but not limited to court-appointed monitoring, comprehensive training requirements, civil penalties, and any other appropriate equitable remedies to prevent future discrimination.

IV. PRAYER FOR RELIEF

WHEREFORE, the plaintiffs, David Figueroa Betancourt, Mirta Colón Pellecier, Bonnelis Cepeda, Carlos Molina Román, Uriel Sepúlveda Alicea, and Walberto Hernández Reyes, respectfully request that this Honorable Court grant the following legal remedies against the defendant, Banco Popular de Puerto Rico:

- I. Pursuant to 42 U.S.C. §12188(a)(2) and 28 CFR §36.504(a), Plaintiffs respectfully request that this Honorable Court order the following specific remedies:

A. Architectural Modifications to All Transaction and Customer Service Counters

1. Lower all counters to a maximum height of 36 inches in all Banco Popular branches in Puerto Rico
2. Ensure minimum depth of 30 inches at all counters to permit proper frontal approach
3. Provide knee clearance of at least 27 inches high, 30 inches wide, and 19 inches deep beneath counters
4. Install continuous lowered sections that span the full depth of counters to provide stable surfaces for document handling
5. Remove any obstacles, protrusions, or cylindrical bars that obstruct counter access

B. Implementation Timeline Requirements

1. Complete all required counter modifications within 180 days of court order
2. Submit detailed compliance progress reports every 60 days until completion
3. Appoint an accessibility compliance officer to oversee implementation
4. Provide written certification of completion signed by a licensed architect or engineer

C. Policy and Procedural Changes

1. Develop and implement written accessibility standards for all future counter installations
2. Create mandatory ADA compliance review procedures for all branch renovations
3. Incorporate accessibility requirements into all vendor contracts for counter design and installation

4. Establish formal process for addressing accessibility complaints at branch level

D. Staff Training Requirements

1. Conduct comprehensive ADA training for all branch personnel within 90 days
2. Implement specific training on proper service techniques for customers with mobility impairments
3. Develop written service protocols for assisting customers with disabilities
4. Require annual refresher training with documented attendance records

E. Independent Verification Measures

1. Submit to inspection by court-appointed ADA compliance expert upon completion
2. Allow quarterly unannounced accessibility audits for one year following remediation
3. Maintain photographic documentation of all accessibility modifications
4. Permit plaintiffs' counsel to verify compliance upon completion

F. Documentation and Reporting Obligations

1. Provide detailed architectural plans for all counter modifications prior to implementation
2. Submit affidavit attesting that all specified modifications have been completed
3. Document training completion for all staff members
4. Report any implementation difficulties or delays within 30 days of occurrence

G. Financial Compensation

1. Pay all reasonable attorneys' fees pursuant to 42 U.S.C. §12205
2. Reimburse all litigation costs and expenses

3. Award nominal damages of \$1 to each plaintiff

H. Accountability Measures

1. Designate corporate officer responsible for ADA compliance
2. Submit to court jurisdiction for enforcement purposes for five years
3. Pay liquidated damages of \$1,000 per day for any compliance delays beyond ordered timeline
4. Appear for quarterly status conferences until full compliance is achieved

I. Future Compliance Assurance

1. Apply identical accessibility standards to all future branch renovations
2. Conduct annual ADA compliance audits at all branches
3. Maintain written record of all accessibility-related customer feedback
4. Designate ADA liaison at each branch location

J. Retention of Jurisdiction

1. Court to retain jurisdiction to enforce terms of the injunction
2. Court to maintain ability to modify requirements as necessary to ensure compliance
3. Court to appoint special master if compliance issues persist
4. Court to hold compliance hearing one year after implementation

- II. In case the defendant continues its discriminatory practices, it is requested that, pursuant to 42 USC §12188 (a)(2) and 28 CFR §36.504, the properties be ordered closed as a precautionary measure to stop the discriminatory condition until it has been irrefutably certified to the satisfaction of the court that the discrimination has been eliminated;

III. Requested Declarations. Plaintiffs respectfully request that this Honorable Court issue the following declarations:

1. Declaration of Discrimination: That the Court declare that Defendant Banco Popular de Puerto Rico's maintenance of transaction and customer service counters at heights exceeding 36 inches, and lacking sufficient depth for proper frontal approach by individuals with mobility impairments, constitutes discrimination in violation of Title III of the Americans with Disabilities Act, 42 U.S.C. § 12181 et seq.
2. Declaration of Ongoing Pattern: That the Court declare that Defendant's consistent implementation of inaccessible counters throughout its extensive branch network in Puerto Rico represents a systematic pattern of discrimination, rather than isolated or inadvertent non-compliance.
3. Declaration of Disparate Treatment: That the Court declare that Defendant's practice of maintaining ADA-compliant counter heights in its Florida branches while failing to implement similar accommodations in Puerto Rico branches demonstrates deliberate disregard for the rights of individuals with disabilities in Puerto Rico.
4. Declaration of Discriminatory Effect: That the Court declare that Defendant's architectural barriers have effectively denied Plaintiffs their right to full and equal enjoyment of Defendant's services, facilities, privileges, advantages, or accommodations, in violation of 42 U.S.C. § 12182(a).
5. Declaration of Legal Requirements: That the Court declare that Title III of the ADA requires Defendant to remove architectural barriers where such removal is

readily achievable, including lowering transaction and customer service counters to a maximum height of 36 inches and providing sufficient depth for proper frontal approach by wheelchair users.

6. Declaration of Corporate Policy: That the Court declare that Defendant's continued implementation of inaccessible counters during renovations and new installations, despite knowledge of ADA requirements as demonstrated by their compliant Florida branches, constitutes an unlawful corporate policy.
7. Purposes of Declaratory Relief: The requested declarations serve multiple important purposes:
 - a. To establish clear legal standards for counter accessibility that Defendant must follow across all branches.
 - b. To provide a definitive judicial determination that counter height and depth are not minor inconveniences but substantive barriers that deny equal access.
 - c. To create a foundation for monitoring compliance with injunctive relief by establishing specific parameters for accessibility.
 - d. To recognize that Defendant's practices have caused actual harm to Plaintiffs by denying them equal access to banking services.
 - e. To acknowledge that Defendant's disparate treatment of customers with disabilities in Puerto Rico versus Florida constitutes a form of discrimination that the ADA was specifically enacted to prevent.

IV. Attorneys' Fees And Costs. Pursuant to 42 U.S.C. § 12205, Plaintiffs request that this Honorable Court award reasonable attorneys' fees and costs incurred in pursuing this action, including but not limited to:

1. Attorneys' Fees:

- a. Reasonable hourly fees for time spent investigating the violations across multiple branches.
- b. Fees for legal research, complaint drafting, and all case preparation.
- c. Fees for court appearances, conferences, and settlement negotiation.
- d. Fees for expert consultation regarding accessibility standards.
- e. Fees for post-judgment monitoring and enforcement activities.

2. Litigation Costs:

- a. Filing fees and court costs.
- b. Expert witness fees for accessibility experts to evaluate the barriers.
- c. Costs for obtaining and analyzing architectural drawings and specifications.
- d. Travel expenses to inspect multiple branch locations.
- e. Costs for document production, copying, and electronic filing.
- f. Deposition costs and transcript fees.
- g. Mediation and ADR expenses.

3. Justification for Fee Award

- a. The extensive nature of the investigation required to document violations across numerous branches.
- b. The complexity of the case involving systematic discrimination across an entire branch network.

- c. The public benefit derived from enforcing ADA compliance in financial institutions.
 - d. The financial disparity between individual Plaintiffs and the corporate Defendant.
 - e. The deterrent effect of a fee award on future non-compliance by Defendant and other financial institutions.
- 4. Fee Enhancement Request:** Plaintiffs request an enhancement to the lodestar amount due to:
- a. The exceptional results obtained.
 - b. The substantial risk undertaken in litigating against a major financial institution.
 - c. The expertise required to address complex architectural accessibility issues.
 - d. The important public policy advanced through this litigation.
- V. Plaintiffs request that the Court retain jurisdiction over the matter of attorneys' fees and costs, allowing supplementation of this request to reflect all reasonable expenses incurred through the conclusion of this litigation, including any appeals or enforcement proceedings.
- VI. Nominal damages for one dollar.
- VII. Attorney's fees, costs, and litigation expenses.
- VIII. The provision of any other remedy that is fair and appropriate, in law or equity, and that has not been expressly requested but is appropriate as a matter of law.

Dated: February 26, 2025.

RESPECTFULLY SUBMITTED.

VELEZ LAW GROUP LLC
Civil Rights Division

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