

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

**RAMON RIVERA *on behalf of his children*  
*V.R.R. and F.R.R.***

Plaintiff

v.

**COMMONWEALTH OF PUERTO  
RICO; MUNICIPALITY OF ARECIBO;  
EMPRESAS RODRIGUEZ INC.;  
FARMACIA DEL CARMEN LLC;  
GASRICO CORPORATION; BUONA  
RESTAURANTS LLC; PARADISE  
B.B.Q. INC.; ADORNO'S BAKERY,  
CORPORACIÓN; MARILYN'S  
RESTAURANT INC.; TIMA CORP.;  
NGP CARIBE LLC; TONY'S CAFE  
LLC; CARIBBEAN WRAPS INC INC.;  
SUPERMERCADOS HATILLO, INC;  
KING CHINA RESTAURANT L.L.C.;  
JOHANNAS PIZZA Y ALGO MAS  
CORP.; GEORGE'S BBQ LLC**

Defendants

**CIVIL NO.**

**COMPLAINT**

**TO THE HONORABLE COURT:**

The plaintiff, Ramón Rivera on behalf of his children V.R.R. and F.R.R., respectfully requests a Permanent Injunction against Commonwealth of Puerto Rico and Municipality of Arecibo in accordance with the Title II of the *Americans with Disabilities Act*, as well as damages and a permanent injunction under Section 504 of the Rehabilitation Act, 29 U.S.C, and, moreover, also requests a permanent injunction against Empresas Rodriguez Inc.; Farmacia Del Carmen LLC; Gasrico Corporation; Buona Restaurants LLC; Paradise B.B.Q.

Inc.; Adorno's Bakery, Corporación; Marilyn's Restaurant Inc.; Tima Corp.; NGP Caribe LLC; Tony's Cafe LLC; Caribbean Wraps Inc Inc.; Supermercados Hatillo, Inc; King China Restaurant L.L.C.; Johannas Pizza Y Algo Mas Corp.; George's BBQ LLC; in accordance with Title III of the *Americans with Disabilities Act*.

## **I. PARTIES**

1. The Plaintiff Ramón Rivera on behalf of his children V.R.R. and F.R.R. is a resident of the Municipality of Arecibo.
2. The Defendant, the Commonwealth of Puerto Rico, is a public entity with the legal capacity to sue and be sued. At all times relevant to this cause of action, it supervised, operated, or owned the sidewalks and streets adjacent to the businesses located on Highway 129 y Highway 2.
3. The Defendant, the Municipality of Arecibo, is a municipal entity with the legal capacity to sue and be sued. At all relevant times to this cause of action, it supervised, operated, or owned the sidewalks and streets identified in Sections D and E of this Complaint.
4. The following co-defendants represent the respective businesses they own, lease, rent, or operate, located within the Municipality of Arecibo:
  - 4.1. Empresas Rodriguez Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Panadería My Sweet Bakery.
  - 4.2. Farmacia Del Carmen LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Farmacia Del Carmen.
  - 4.3. Gasrico Corporation is the owner, lessor, lessee, and/or operator of the public accommodation known as Rico Gas.
  - 4.4. Buona Restaurants LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Antoninos Pizza-Arecibo.

- 4.5. Paradise B.B.Q. Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Paradise B.B.Q.
- 4.6. Adorno's Bakery, Corporación is the owner, lessor, lessee, and/or operator of the public accommodation known as Adorno's Bakery Corporation.
- 4.7. Marilyn's Restaurant Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Marilyn's Restaurant.
- 4.8. Tima Corp. is the owner, lessor, lessee, and/or operator of the public accommodation known as Poco Loco Arecibo.
- 4.9. NGP Caribe LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as La Guira Restaurant & Lounge.
- 4.10. Tony's Cafe LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Adis.
- 4.11. NGP Caribe LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Arasibo Steak House.
- 4.12. Caribbean Wraps Inc Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Caribe Wraps.
- 4.13. Supermercados Hatillo, Inc is the owner, lessor, lessee, and/or operator of the public accommodation known as Hatillo Kash N' Karry.
- 4.14. King China Restaurant L.L.C. is the owner, lessor, lessee, and/or operator of the public accommodation known as King China Restaurant.
- 4.15. Johannas Pizza Y Algo Mas Corp. is the owner, lessor, lessee, and/or operator of the public accommodation known as Johannas Pizza Y Algo Mas Corp

- 4.16. George's BBQ LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as George's BBQ.

## **II. ALLEGATIONS**

### **A. Regarding the Plaintiff's Medical Conditions**

4. V.R.R. and F.R.R. are two children living with spinal muscular atrophy, a rare genetic disease that affects the motor neurons in the spinal cord. This condition causes progressive muscle weakness, typically starting in the muscles closest to the trunk and advancing towards the more distal muscles, such as those in the arms and legs. Spinal muscular atrophy severely impacts their ability to move, making each of them dependent on assistive devices, such as powered wheelchairs, to move with greater comfort and safety. As the disease progresses, the strength of their respiratory muscles is also affected, which can lead to additional complications in terms of health and overall well-being.
5. The impact of spinal muscular atrophy on V.R.R. and F.R.R.'s daily activities is profound and affects every aspect of their lives. Each of them faces difficulties in performing basic tasks that other children can do independently, such as walking, getting out of bed, dressing, or even eating without assistance. Muscle weakness also affects their ability to play, engage in recreational and social activities, and perform spontaneous movements that are essential for physical and emotional development. As a result, they require constant assistance in most of their daily activities, leading to a high level of dependency on their caregivers, primarily their father, Mr. Ramón Rivera. These physical limitations not only affect their autonomy but also influence their emotional well-being, as being physically limited poses additional challenges in interacting with other children their age and participating in experiences that might be considered common for them. These factors highlight the need for an adapted environment that provides them with as much

independence as possible, while still ensuring constant care and specialized attention to address the challenges their condition presents.

6. The primary caregiver for V.R.R. and F.R.R. is Mr. Ramón Rivera, who dedicates a significant amount of his time and energy to caring for his children. Given that both children have spinal muscular atrophy, Mr. Rivera is constantly present to assist them with the daily tasks that require support. From helping them move from one place to another, to assisting with feeding, bathing, and dressing, his role is fundamental to their physical and emotional well-being. Additionally, Mr. Rivera manages medical appointments and necessary treatments for their condition, ensuring they receive the proper and timely care. His presence not only guarantees that the children's physical needs are met, but also provides invaluable emotional support by offering them security, affection, and constant companionship. Mr. Rivera's commitment and dedication are essential for V.R.R. and F.R.R. to face daily challenges with greater comfort and the highest level of independence possible within the circumstances of their condition.

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

7. The location in question is a place of public accommodation known as Panadería My Sweet Bakery, located at Ave. Juan Rosado #335, Arecibo, PR 00612-0000, with coordinates 18.465962499394575, -66.71926137787537.

7.1.1. The sidewalk in question is located in front of Panadería My Sweet Bakery, and it is situated at Ave. Juan Rosado #335, Arecibo, Pr 00612-0000, with coordinates 18.465962499394575, -66.71926137787537.

8. The location in question is a place of public accommodation known as Farmacia del Carmen, located at Ave. Juan Rosado Hwy. #2, Arecibo, PR 00659-0000, with coordinates 18.467269436568635, -66.71803033316827.

- 8.1.1. The sidewalk in question is located in front of Farmacia del Carmen, and it is situated at Ave. Juan Rosado Hwy. #2, Arecibo, PR 00659-0000, with coordinates 18.467269436568635, -66.71803033316827.

9. The location in question is a place of public accommodation known as Rico Gas, located at 113 Juan Rosado, Arecibo PR 00612-0000, with coordinates 18.46962623180991, -66.71560315610886.

- 9.1. The sidewalk in question is located in front of Rico Gas, and it is situated at 113 Juan Rosado, Arecibo PR 00612-0000, with coordinates 18.46962623180991, -66.71560315610886.

10. The location in question is a place of public accommodation known as Antoninos Pizza-Arecibo located at 931 San Luis Ave, Arecibo, PR 00612-3854, with coordinates 18.462082524292327, -66.73771829876097.

- 10.1. The sidewalk in question is located in front of Antoninos Pizza-Arecibo located at 931 San Luis Ave, Arecibo, PR 00612-3854, with coordinates 18.462111897641506, -66.73776255193408.

11. The location in question is a place of public accommodation known as Paradise B.B.Q. located at Hwy. 129, San Luis Avenue, Marginal 963, Arecibo, PR 00613-0000, with coordinates 18.461016700883295, -66.73856010886783.

- 11.1. The sidewalk in question is located in front of Paradise B.B.Q. located at Hwy. 129, San Luis Avenue, Marginal 963, Arecibo, PR 00613-0000, with coordinates 18.461016700883295, -66.73856010886783.
12. The location in question is a place of public accommodation known as Adorno's Bakery Corporation located at 953 San Luis Avenue, Arecibo, PR 00612-3899, with coordinates 18.46146626449315, -66.73809339985306.
  - 12.1. The sidewalk in question is located in front of Adorno's Bakery Corporation located at 953 San Luis Avenue, Arecibo, PR 00612-3899, with coordinates 18.46146626449315, -66.73809339985306.
13. The location in question is a place of public accommodation known as Marilyn's Restaurant located at Unit 1, 552 Rotarios Ave, José Cedeño District, Arecibo, PR 00612-0000, with coordinates 18.469004941643824, -66.72851922317926.
  - 13.1. The sidewalk in question is located in front of Marilyn's Restaurant located at Unit 1, 552 Rotarios Ave, José Cedeño District, Arecibo, PR 00612-0000, with coordinates 18.46885306754986, -66.72846932700661.
14. The location in question is a place of public accommodation known as Poco Loco Arecibo, located at Av. Jose De Diego 325, Arecibo, PR 00612-0000, with coordinates 18.472130687369898, -66.7227537312851.
  - 14.1. The sidewalk in question is located in front of Poco Loco Arecibo, situated at Av. Jose De Diego 325, Arecibo, PR 00612-0000, with coordinates 18.472130687369898, -66.7227537312851.

15. The location in question is a place of public accommodation known as La Guira Restaurant & Lounge, located at 321 Av. Jose De Diego, Arecibo, PR 00612-0000, with coordinates 18.472236978604332, -66.72258674906895.
  - 15.1. The sidewalk in question is located in front of La Guira Restaurant & Lounge, situated at 321 Av. Jose De Diego, Arecibo, PR 00612-0000, with coordinates 18.472236978604332, -66.72258674906895.
16. The location in question is a place of public accommodation known as Adis, located at 150 Street Dr. Manuel Zeno Gandia, Arecibo, PR 00612-0000, with coordinates 18.471403993943348, -66.72234898775197.
  - 16.1. The sidewalk in question is located in front of Adis, situated at 150 Street Dr. Manuel Zeno Gandia, Arecibo, PR 00612-0000, with coordinates 18.471403993943348, -66.72234898775197
17. The location in question is a place of public accommodation known as La Arasibo Steak House, located at Gonzalo Marín 109 Betancourt Building, Arecibo, PR 00612-0000, with coordinates 18.472277322875335, -66.7138626463045.
  - 17.1. The sidewalk in question is located in front of Arasibo Steak House, situated at Gonzalo Marín 109 Betancourt Building, Arecibo, PR 00612-0000, with coordinates 18.472277322875335, -66.7138626463045.
18. The location in question is a place of public accommodation known as Caribe Wraps located at Hwy. 1 Corner Hwy. #2 Radioville #23, Arecibo, PR 00612-0000, with coordinates 18.47647262154695, -66.75306383730462.



- 18.1. The sidewalk in question is located in front of Caribe Wraps, situated at Hwy. 1 Corner Hwy. #2 Radioville #23, Arecibo, PR 00612-0000, with coordinates 18.47647262154695, -66.75306383730462.
19. The location in question is a place of public accommodation known as Hatillo Kash N' Karry located at 506 Av. Catalina, Stgo Chico, Arecibo, PR 00612-2868, with coordinates 18.470227332828383, -66.75790129504185
- 19.1. The sidewalk in question is located around Hatillo Kash N' Karry located at 506 Av. Catalina, Stgo Chico, Arecibo, PR 00612-2868, with coordinates 18.470227332828383, -66.75790129504185
20. The location in question is a place of public accommodation known as King China Restaurant LLC located at Hwy. 129 KM 40.8, Víctor Rojas 1, Arecibo, PR 00612-0000, with coordinates 18.459543134464127, -66.73962873134431.
- 20.1. The sidewalk in question is located in front of King China Restaurant LLC located at Hwy. 129 KM 40.8, Víctor Rojas 1, Arecibo, PR 00612-0000, with coordinates 18.459543134464127, -66.73962873134431.
- 20.2. The sidewalk ramp in question is located in front, at the corner of King China Restaurant LLC located at Hwy. 129 KM 40.8, Víctor Rojas 1, Arecibo, PR 00612-0000 with coordinates 18.459714299220998, -66.73974468600986.
- 20.3. The sidewalk ramp in question is located in front, at the corner of King China Restaurant LLC located at Hwy. 129 KM 40.8, Víctor Rojas 1, Arecibo, PR 00612-0000 with coordinates 18.459739741219423, -66.73961325777144.
21. The location in question is a place of public accommodation known as Johannas Pizza Y Algo Mas Corp located at Hwy. 2 KM 63.6, Candelaria Sector, Sabana Hoyos

Neighborhood, Arecibo, PR 00612-0000, with coordinates 18.43538961172964, -66.62211108605362.

21.1. The sidewalk in question is located in front of Johannas Pizza Y Algo Mas Corp located at Hwy. 2 KM 63.6, Candelaria Sector, Sabana Hoyos Neighborhood, Arecibo, PR 00612-0000, with coordinates 18.43538961172964, -66.62211108605362.

22. The location in question is a place of public accommodation known as George's BBQ, located at Av. San Luis #960 Km 1.7, Highway 129, Bo. Hato Abajo, Arecibo, PR 00612-0000, with coordinates 18.46113911575524, -66.73914695141852.

22.1. The sidewalk in question is located in front of George's BBQ, situated at Av. San Luis #960 Km 1.7, Highway 129, Bo. Hato Abajo, Arecibo, PR 00612-0000, with coordinates 18.46113911575524, -66.73914695141852.

**C. Concerning the Sidewalks and Sidewalks ramps in Question and the Court's Jurisdiction**

23. The sidewalks and sidewalks ramps in controversy are the followings:

23.1. The following coordinates at the address Street María de Hostos, Arecibo, PR 00612-0000 are in controversy:

23.1.1. The sidewalk located on Street María de Hostos, Arecibo, PR 00612-0000, from coordinates 18.470734952129916, -66.71510059928289 to coordinates 18.470497496435033, -66.71504180443151.

23.1.2. The sidewalk located on Street María de Hostos, Arecibo, PR 00612-0000, from coordinates 18.47127727765751, -66.71523585847899 to coordinates 18.471000647470625, -66.7151773145332.

- 23.1.3. The sidewalk at the ramp located on Street María de Hostos, Arecibo, PR 00612-0000, at coordinates 18.471005724134237, -66.7151839320263.
- 23.2. The following coordinates at the address Street Pura Giraud, Arecibo, PR 00612-0000 are in controversy:
  - 23.2.1. The sidewalk located on Street Pura Giraud, Arecibo, PR 00612-0000, from coordinates 18.470987082277926, -66.71456699521607 to coordinates 18.470803275805835, -66.71505649834246.
  - 23.2.2. The sidewalk at the corner located on Street Pura Giraud, Arecibo, PR 00612-0000, at coordinates 18.470793463879577, -66.71505095345239.
  - 23.2.3. The sidewalk located on Street Pura Giraud, Arecibo, PR 00612-0000, from coordinates 18.4707725140603, -66.71513819447664 to coordinates 18.47061746296984, -66.71566688756762.
  - 23.2.4. The sidewalk at the corner located on Street Pura Giraud, Arecibo, PR 00612-0000, at coordinates 18.470762723072742, -66.71515369528008.
- 23.3. The following coordinates at the address Street Cristobal Colón, Arecibo, PR 00612-0000 are in controversy:
  - 23.3.1. The sidewalk ramp located on Street Cristobal Colón, Arecibo, PR 00612-0000, at coordinates 18.471286283731512, -66.71516713229595, in front of Programa WIC Puerto Rico.
  - 23.3.2. The sidewalk located on Street Cristobal Colón, Arecibo, PR 00612-0000, from coordinates 18.47117902990164, -66.71565311295379 to coordinates 18.471265743440977, -66.71525242139097.

23.3.3. The sidewalk ramp located on Street Cristobal Colón, Arecibo, PR 00612-0000, at coordinates of 18.471265394426908, -66.71525334901285.

23.4. The following coordinates at the address Street Gonzalo Marin, Arecibo, PR 00612-0000 are in controversy:

23.4.1. The sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.472839175648947, -66.71246633590847 to coordinates 18.472729783383098, -66.71241738559719, in front of Porcell Cocina.

23.4.2. The sidewalk at the corner located on Street Gonzalo Marin, Arecibo, PR 00612-0000, at coordinates 18.472724907889987, -66.71242798083365.

23.4.3. The sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.47262925222778, -66.71147299290047 to coordinates 18.47265532831292, -66.7120060819219, in front of Paseo de las Damas.

23.4.4. The sidewalk ramp located on Street Gonzalo Marin, Arecibo, PR 00612-0000 at coordinates 18.47278949200594, -66.71215299710431, in front of Paseo de las Damas.

23.4.5. The sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.472645762545476, -66.71260945150968 to coordinates 18.472600838343983, -66.7127571841263.

23.4.6. The sidewalk at corner located in Street Gonzalo Marin, Arecibo, PR 00612-0000, at coordinates 18.47264756482775, -66.71172447145842.

23.5. The following coordinates at the address 680 Av. Victor Rojas, Arecibo, PR 00612-0000 are in controversy:

23.5.1. The sidewalk located on 680 Av. Victor Rojas, Arecibo, PR 00612-0000, from coordinates 18.473295482367703, -66.71265646084154 to coordinates 18.473370355727052, -66.71406612321384.

23.5.2. The sidewalk located on 680 Av. Víctor Rojas, Arecibo, PR 00612-0000, from coordinates 18.473688005300456, -66.71631844307902 to coordinates 18.473488333118166, -66.71534877370478, in front of Toledo Clinical Laboratory Parking Lot (Estacionamiento Laboratorio Clínico Toledo).

23.5.3. The sidewalk at the corner located on 680 Av. Victor Rojas, Arecibo, PR 00612-0000, at coordinates 18.473807623528888, -66.71721249134966.

23.5.4. The sidewalk at the corner located on 680 Av. Victor Rojas, Arecibo, PR 00612-0000, at coordinates 18.473821325791967, -66.7173784389283.

23.5.5. The sidewalk located in Av Victor Rojas, Arecibo, PR 00612-0000, at coordinates 18.47329534463549, -66.71284035690225 to coordinates 18.473240232485402, -66.71303509173973.

23.6. The following coordinates at the address Av. José de Diego, Arecibo, PR 00612-0000 are in controversy:

23.6.1. The sidewalk located on Av. José de Diego, Arecibo, PR 00612-0000, from coordinates 18.47286359597812, -66.71238801826166 to coordinates 18.47287948732238, -66.71292909674295, in front of Bandera PR Arecibo.

- 23.6.2. The sidewalk ramp located on Av. José de Diego, Arecibo, PR 00612-0000, at coordinates 18.472866226335643, -66.71279684398624.
- 23.6.3. The sidewalk at the corner located on Av. José de Diego, Arecibo, PR 00612-0000, at coordinates 18.472879734831263, -66.7129287595799.
- 23.6.4. The sidewalk at the corner located on Av. Jose de Diego, at coordinates 18.472232591189158, -66.71630807816108.
- 23.6.5. The sidewalk at the corner located on Av. Jose de Diego, at coordinates 18.472101904573996, -66.71629498342756.
- 23.6.6. The sidewalk located on Av. José Diego, Arecibo, PR 00612-0000, at coordinates 18.472232921363773, -66.71630839447174.
- 23.7. The following coordinates at the address Bio Street, Arecibo, PR 00612-0000 are in controversy:
  - 23.7.1. The sidewalk at the corner located on Bio Street, Arecibo, PR 00612-0000, at coordinates 18.472042179529442, -66.71285894427673.
  - 23.7.2. The sidewalk located on Bio Street, Arecibo, PR 00612-0000, from coordinates 18.471898891473, -66.71307917192154 to coordinates 18.471672473604215, -66.71390261003438.
  - 23.7.3. The sidewalk located on Bio Street, Arecibo, PR 00612-0000, from coordinates 18.472116545990204, -66.71289446515041 to coordinates 18.472198590489477, -66.7129373804918.
  - 23.7.4. The sidewalk at the corner located on Bio Street, Arecibo, PR 00612-0000, at coordinates 18.472110821953894, -66.71289178294161.

23.7.5. The sidewalk located on Bio Street, Arecibo, PR 00612-0000, at coordinates 18.472117764560483, -66.7128955092277.

23.8. The following coordinates at the address 514 Av. Miramar, Arecibo, PR 00612-0000 are in controversy:

23.8.1. The sidewalk located on 514 Av. Miramar, Arecibo, PR 00612-0000, from coordinates 18.472186910358108, -66.73011425773615 to coordinates 18.472169544735547, -66.73169665418636.

23.8.2. The sidewalk ramp located on 514 Av. Miramar, Arecibo, PR 00612-0000, at coordinates of 18.47217570510977, -66.73171841124922.

23.9. The following coordinates at the address Puerto Rico Highway 2, Arecibo, PR 00612-0000 are in controversy:

23.9.1. The sidewalk located on Puerto Rico Highway 2, Arecibo, PR 00612-0000 from coordinates 18.46705504156216, -66.71826364687824 to coordinates 18.46709320292354, -66.71831125608112.

23.9.2. The sidewalk ramp located on Puerto Rico Highway 2, Arecibo, PR 00612-0000, at coordinates 18.46708707691952, -66.71832315641116.

23.9.3. The sidewalk located on Puerto Rico Highway 2, Arecibo, PR 00612-0000, from coordinates 18.467640149790963, -66.71880597203683 to coordinates 18.467693575514687, -66.71886498063125, in front of Martin's BBQ.

23.9.4. The sidewalk located on Puerto Rico Highway 2, Arecibo, PR 00612-0000, Arecibo, PR 00612-0000, from coordinates 18.467121089840163, -66.71817468400894 to coordinates

18.467208338573595, -66.71828373897222, in front of Del Carmen Pharmacy

23.9.5. The sidewalk at the corner located on Puerto Rico Highway 2, Arecibo, PR 00612-0000, at coordinates 18.467225966719752, -66.71825938056978.

23.10. The following coordinates at the address Av. Santiago Iglesias Pantín, Arecibo, PR 00612-0000 are in controversy:

23.10.1. The sidewalk at the corner located on Av. Santiago Iglesias Pantín, Arecibo, PR 00612-0000, at coordinates 18.47112487582255, -66.71673579287533.

23.10.2. The sidewalk at the corner located on Av. Santiago Iglesias Pantín, Arecibo, PR 00612-0000, at coordinates 18.469873449848738, -66.71641276951424.

23.10.3. The sidewalk located on Av. Santiago Iglesias Pantín, Arecibo, PR 00612-0000, at coordinates 18.469901281219187, -66.71646780130241.

23.11. The following coordinates at the address Av. Juan Rosado, Arecibo, PR 00612-0000 are in controversy:

23.11.1. The sidewalk located on Av. Juan Rosado, Arecibo, PR 00612-0000, from coordinates 18.467365399889445, -66.71818281619913 to coordinates 18.467475431596917, -66.71804736464898, in front of Gulf.

23.11.2. The sidewalk located on Av. Juan Rosado, Arecibo, PR 00612-0000, at coordinates 18.46737254864544, -66.71811361089037.



23.12. The following coordinates at the address Street M. Perez Freytes, Arecibo, PR 00612-0000 are in controversy:

23.12.1. The sidewalk located on Street M. Perez Freytes, Arecibo, PR 00612-0000 from coordinates 18.47085760272828, -66.72101214820607 to coordinates 18.470899579296727, -66.72082372303531.

23.12.2. The sidewalk located at Street M. Perez Freytes, Arecibo, PR 00612-0000, at coordinates 18.470901639310725, -66.72082100120997.

23.13. The sidewalk located on Betances street, Arecibo, PR 00612-0000 from coordinates 18.47185712591924, -66.71648115285016 to coordinates 18.471800399529982, -66.7167252367382, in front of Café Tinto.

23.14. The sidewalk located on González Ginorio street, Arecibo, PR 00612-0000, from coordinates 18.473286994132568, -66.71279263256413 to coordinates 18.47322951263654, -66.71309804651459.

23.15. The sidewalk at the corner located on Palma Street, Arecibo, PR 00612-0000, at coordinates 18.47369028987566, -66.71665420984951.

23.16. The sidewalk at the corner located on Jurregui Street, Arecibo, PR 00612-0000, at coordinates 18.47279261012666, -66.7153756232567.

23.17. The sidewalk at the corner located on San Felipe Street, Arecibo, PR 00612-0000 at coordinates 18.471428887235774, -66.71681223583002.

23.18. The sidewalk at the corner located on Oriosto Cruz Street, Arecibo, PR 00612-0000, at coordinates 18.472210038556028, -66.71294140380509.

23.19. The following coordinates at the address Highway 129, Arecibo, PR 00612-0000 are in controversy:

- 23.19.1. The sidewalk located on Highway 129, Arecibo, PR 00612-0000, at coordinates 18.447369290467034, -66.75107563448888.
- 23.19.2. The sidewalk at the corner located on Highway 129, Arecibo, PR 00612-0000, at coordinates 18.448023643709274, -66.7505421102471.
- 23.20. The following coordinates at the address Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000 are in controversy:
  - 23.20.1. The sidewalk at the corner located on Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.44818293833415, -66.75042213099329.
  - 23.20.2. The sidewalk located on Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.448271251380792, -66.75035692878957 to 18.449994056840925, -66.74887092328011.
  - 23.20.3. The sidewalk at the corner located on Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.450104557621554, -66.74875413017556.
  - 23.20.4. The sidewalk at the corner located on Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.45016180531591, -66.74870786207111.
  - 23.20.5. The sidewalk located on Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.450180815958678, -66.74869056374061.
  - 23.20.6. The sidewalk located on Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.450539505601423, -66.74835902190172.

23.21. The following coordinates at the address Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000 are in controversy:

23.21.1. The sidewalk at the corner located on Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.456788782584393, -66.74250843860331.

23.21.2. The sidewalk ramp located on Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.456966149481513, -66.74245259807569.

23.21.3. The sidewalk located on Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.457049924552052, -66.74235436992424.

23.21.4. The sidewalk located on Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.47000236531382, -66.72919612658893 to 18.470532906027195, -66.72863902802933.

23.21.5. The sidewalk located on Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.47062551882541, -66.72841929621939.

23.21.6. The sidewalk located on Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.470893679893614, -66.72823709739112 to 18.47172800375655, -66.72741090690086.

23.22. The following coordinates at the address 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000 are in controversy:

23.22.1. The sidewalk located on 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, at coordinates 18.47219856239144, -66.72832897543647.

23.22.2. The sidewalk located on 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, at coordinates 18.472175852798546, -66.72961659206327.

23.22.3. The sidewalk located on 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, at coordinates 18.472184800973775, -66.73053025170935.

23.22.4. The sidewalk located on 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, at coordinates 18.472169349030327, -66.73084396938559.

23.22.5. The sidewalk located on 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, at coordinates 18.47215812337618, -66.7311382705717.

**D. Discrimination in the Municipality of Arecibo and Other Businesses Against V.R.R. and F.R.R., and Their Caregiver Ramón Rivera, Due to the Children's Disability**

24. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., deeply value the opportunity to spend time together as a family and enjoy the outdoors, as it allows them to share special moments and strengthen their family bond. Despite the children's mobility limitations, they have always found comfort and joy in outdoor walks. Walking through parks and plazas gives them the chance to enjoy nature, converse, and create memories together, which helps them feel connected and cope with daily challenges. In addition to enjoying these family moments, Mr. Ramón frequently goes out with his children because, as their primary caregiver, he cannot leave them alone and is always present to ensure their well-being and provide the necessary support.

25. For them, these moments are more than just outings; they are an opportunity for the children to explore the world independently, within their limitations, and for Mr. Ramón, as a caregiver, to offer them the freedom to enjoy experiences that are common for many but, due to the lack of accessibility, become more complicated. Despite the barriers they face in the city, the family feels a strong motivation to walk through the streets and explore those green spaces, knowing that every step, no matter how small, is a step toward independence and family enjoyment.
26. Mr. Ramón deeply wishes that his children could move more freely, without the constant worry about architectural obstacles hindering their mobility. Throughout their visits, he has seen how, despite their efforts to make the journey as comfortable as possible, physical barriers limit what they can do together, from walking along the sidewalk to enjoying a family meal. The vision of a more accessible city would allow them to enjoy their time together even more, without the restrictions that the current barriers impose on them.
27. The desire to spend time together as a family drives Mr. Ramón to persist in his efforts, hoping that conditions will improve so that his children can enjoy their right to a full and unrestricted life. For him, each walk and every family moment is valuable, and his motivation to overcome the physical barriers that prevent them from moving with ease reflects his deep desire for his children to live as independently and satisfactorily as possible.
28. The children, V.R.R. and F.R.R., are forced to face physical obstacles at every turn, which severely limits their opportunities to fully enjoy the surroundings. The deteriorated sidewalks and inadequate ramps not only make it more difficult for them to move but

also create a sense of exclusion and not belonging, as if the city's urban design had not been considered for people with reduced mobility. This lack of accessibility traps them in a cycle of frustration, where what should be an everyday activity becomes a constant struggle to move safely and comfortably.

29. Moreover, even when they manage to overcome the barriers on the sidewalks and reach businesses or restaurants, V.R.R. and F.R.R. continue to encounter obstacles inside these establishments. Some of the most common problems include service counters that are too high without accessible sections, narrow aisles that make it difficult for them to move safely, and restrooms that lack proper accommodations, such as grab bars and sufficient maneuvering space. These conditions completely prevent the children from enjoying their visit, leaving them with a sense of exclusion and discouragement, as they are unable to fully participate in experiences that should be common for everyone.
30. Mr. Ramón, as their primary caregiver, also suffers deeply due to these obstacles, as he must make additional efforts to assist his children at every step. The constant need to help them navigate through these inadequate spaces increases his physical and emotional burden. Despite his dedication, having to intervene constantly to ensure their safety and comfort causes him significant physical and mental exhaustion.
31. The children, V.R.R. and F.R.R., and Mr. Ramón himself feel discouraged from walking through the streets of Arecibo and its businesses because, despite their efforts to enjoy the surroundings, the architectural barriers remain a constant that limits their freedom and comfort. The physical and emotional effort required to navigate the city has left them feeling frustrated and tired, discouraging them from returning to these places. The lack of

accessibility and spaces designed with their well-being in mind makes even the places that should be enjoyed become a constant reminder of their exclusion.

**Responsibility of the Municipality of Arecibo and Empresas Rodriguez Inc. -  
Panadería My Sweet Bakery**

32. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are frequent customers of My Sweet Bakery, a place they visited in December 2024, January 2025, with their last visit being on February 22, 2025. They especially enjoy products such as freshly baked bread, pastries, and donuts, which have become their favorite choices due to the excellent quality and flavor they offer. However, Mr. Rivera and his children, V.R.R. and F.R.R., personally identified the existence of a series of architectural barriers in the establishment, which made access and mobility within the premises difficult. Therefore, despite valuing the quality of the products and the family-friendly atmosphere, this issue led them to reconsider their visits, dissuading them from returning due to the difficulties they faced when trying to move around inside the establishment.
33. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have the intention to return to My Sweet Bakery during the next five months to enjoy their products, especially their donuts, which have become one of their favorite choices. However, they are currently discouraged from doing so due to the persistent presence of accessibility barriers. The following obstacles, which Mr. Ramón Rivera and his children directly identified during their visit, not only caused significant discomfort but also reinforced their decision to avoid returning until these issues are resolved. Mr. Ramón and his children, V.R.R. and F.R.R., personally identified the following barriers at My Sweet Bakery:
  - 33.1. Narrow Sidewalk: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., noticed that the sidewalk in front of My Sweet Bakery, located at Ave. Juan Rosado #335,

Arecibo, PR 00612-0000, with coordinates 18.465962499394575, -66.71926137787537, was too narrow, making safe passage difficult. This excessively narrow sidewalk restricts the mobility of the children, who rely on the use of a convoy to move around. The lack of a sufficiently wide and accessible space not only hindered the children's smooth movement but also exposed them to risky situations, as the limited space made it difficult to maneuver safely. For V.R.R. and F.R.R., the inability to move freely turned a simple path to the entrance into a frustrating challenge. Due to their medical condition, the use of the Convoy for movement was affected, causing physical and emotional discomfort, especially seeing that they could not move with the necessary freedom. Mr. Ramón, as their caregiver, was also affected, as he had to find alternative routes, which were not always safe or practical.

- 33.1.1. It is the Municipality's responsibility to ensure that public infrastructure is safe and accessible. However, despite being fully aware of the existing deficiencies, it has failed to take the necessary actions to address them, which reveals a lack of response to an issue that directly affects the mobility and safety of the public. This omission perpetuates a situation of discrimination, as it excludes V.R.R. and F.R.R., who are forced to face additional obstacles in their movement. Moreover, the Municipality's inaction reinforces their exclusion by denying them an adequate and safe urban environment, and it worsens inequality by not implementing measures to guarantee equitable access for them.



33.2. Inaccessible Ramp: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., also encountered the ramp located at the main entrance to the establishment, which did not meet the necessary conditions to ensure safe passage. The steep incline, along with cracks, potholes, and faded paint, made its use difficult and even hazardous. Instead of facilitating entry into the establishment, this structure became an obstacle that hindered their mobility and created moments of distress. For V.R.R. and F.R.R., who rely on a convoy to move around, the uneven surface of the ramp caused instability along their path, making them feel unsafe with each attempt to advance. The unexpected jolts and the lack of a proper entryway made what should have been a simple entrance an uncomfortable and tiring challenge. Mr. Ramón, always attentive to his children's well-being, had to put in extra effort to ensure their safety on a ramp that clearly did not provide them with stability. Instead of finding an accessible and welcoming space, they were faced with an architectural barrier that complicated their visit. This issue affected not only the children's comfort but also their father's peace of mind, leaving him feeling frustrated and concerned.

33.3. Reduced Circulation Space: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., encountered a significant challenge that made their experience at the establishment difficult. The arrangement of furniture and other elements inside the bakery greatly reduced the circulation space. The layout did not allow for smooth movement, especially for those who require a properly accessible area to navigate with assistance. For V.R.R. and F.R.R., this became a constant obstacle. Their mobility device was unable to maneuver easily between tables and chairs, forcing

them to make unnecessary efforts just to move around the establishment. Several times, they had to stop abruptly or change direction due to the lack of available space, leading to frustration and discomfort. Mr. Ramón, always prioritizing the safety and well-being of his children, experienced significant stress as he watched them struggle to get around. The lack of an accessible environment not only made them feel uncomfortable, as Mr. Ramón Rivera, always prioritizing the safety and well-being of his children, experienced significant stress as he watched them struggle to get around.

- 33.4. Inaccessible Tables: Mr. Ramón Rivera and his children, V.R.R. and F.R.R. personally identified that tables were not accessible. Each one had a support bar underneath, preventing the children from comfortably positioning themselves with their mobility device. For V.R.R. and F.R.R., this posed an immediate limitation. The design of the tables prevented them from getting close enough to sit properly, forcing them to stay at a distance from the dining area and making it difficult to interact with their family. A moment meant for relaxation and togetherness becomes an uncomfortable experience where they struggle to settle in or enjoy their visit like any other customer. Mr. Ramón felt a deep sense of concern and frustration, as he knew his children, V.R.R. and F.R.R., were unable to remain standing or find a comfortable alternative within the establishment, which left him feeling stressed and disappointed. The realization that he was unable to provide V.R.R. and F.R.R. with a space where they felt welcome and at ease weighed heavily on him.

- 33.5. Counters Too High: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., personally identified an obstacle that made their experience more difficult: the counters were too high. Unlike other children their age, who may be able to stretch or briefly lean forward to reach the counter, V.R.R. and F.R.R. do not have this option, putting them at a clear disadvantage when trying to interact with staff, place an order, or receive assistance without fully relying on their father. For Mr. Ramón, this barrier adds an extra burden, as he constantly has to step in to compensate for the lack of accessibility in spaces that should be designed to accommodate all customers equally. The inadequate counter height not only restricts V.R.R. and F.R.R.'s independence but also reinforces a sense of exclusion, as it prevents them from participating autonomously in everyday activities.
- 33.6. Counters Without Front Clearance: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., identified another barrier that the counters lacked proper front clearance, preventing them from getting close with their mobility device. The structure restricted their ability to position themselves comfortably to place orders or interact with the staff. For V.R.R. and F.R.R., this barrier kept them at an uncomfortable distance from the counter, making it difficult for them to take an active role in the purchase. The absence of a clear space at the base of the structure created a sense of exclusion and limited their access to a basic service. Mr. Ramón, who constantly looks after his children's comfort and safety, felt significant tension as he watched them struggle with something so simple. The

frustration of not finding a space adapted to their needs turned a routine moment into an uncomfortable and exhausting situation.

33.7. Restroom Without Accessible Signage: During their visit to My Sweet Bakery, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., noticed that the restroom entrance lacked accessible signage. The absence of the universal accessibility symbol made identifying the appropriate restroom more difficult, affecting the independence of those who rely on adapted spaces. For V.R.R. and F.R.R., this issue created uncertainty when trying to locate a restroom that would allow them to enter with their mobility device. Without clear signage, they had to depend entirely on Mr. Ramón to ensure they can access it without difficulty. This not only reduced their independence but also caused discomfort, as they lacked an immediate visual reference. Mr. Ramón felt frustrated by the lack of a clear indicator, as he had to make an extra effort to verify that the restroom was accessible before his children used it. A process that was meant to be simple and hassle-free became confusing and exhausting.

33.8. Inaccessible Toilet Flush Button: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., encountered a significant issue inside the restroom at My Sweet Bakery, as the toilet flush button was positioned in an inaccessible location, in the closed part of the restroom, making it difficult to use without assistance. The button was placed in a spot too high and far from where the children, who rely on an assistive device like the Convoy, can reach it easily. Its placement did not consider the needs of those who require reachable controls to maintain their independence. For V.R.R. and F.R.R., this obstacle turned into a frustrating situation. Since they

lacked a way to operate the mechanism by themselves, they depended entirely on Mr. Ramón to carry out a task that is meant to be easy and self-sufficient. The inability to perform this basic action by themselves caused discomfort and a lack of control over their surroundings. Mr. Ramón, seeing his children struggle with this difficulty, felt deeply troubled. He understood that something so essential was not supposed to require external assistance, yet the design lacked accessibility, forcing him to intervene. This situation created stress and made him reflect on the lack of accommodations in the space.

- 33.9. Restroom Without Side and Rear Grab Bars: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., personally identified another barrier that compromised the children's safety and stability: the absence of side and rear grab bars. Without these essential supports, using the toilet became difficult for V.R.R. and F.R.R., who could not maintain their balance safely when attempting to sit down or stand up. The lack of grab bars made the children feel insecure and caused them to lose their balance on several occasions, which led to physical and emotional discomfort. Although they did not fall, simply slipping or losing their stability increased their discomfort and created a sense of vulnerability. Instead of finding a space adapted to their needs, V.R.R. and F.R.R. faced an environment that did not provide the necessary stability. Mr. Ramón, seeing his children struggle with this difficulty, felt deeply concerned, as their safety is his top priority. The absence of these supports alerted him to the potential risk of an incident occurring, leaving him anxious and frustrated.

- 33.10. High Dispensers: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., also identified that the soap and paper dispensers were installed at an inaccessible height. For V.R.R. and F.R.R., the inability to reach the dispensers stopped them from completing their hygiene routine on their own. When attempting to stretch to reach the dispensers, the children experienced pain in their joints, as their health conditions make it difficult to perform such forced movements. The lack of accessibility forced them to rely on Mr. Ramón for something as basic as washing their hands, reducing their independence and causing discomfort. Mr. Ramón immediately noticed the difficulty his children faced and felt frustrated seeing how an unnecessary barrier prevented them from managing a routine task. The pain they felt while stretching also caused emotional distress. Instead of providing them with a functional environment, the establishment introduced yet another obstacle that turned their visit into a stressful and exhausting experience.
- 33.11. The barriers at My Sweet Bakery can be eliminated by implementing modifications that ensure safe and unrestricted access for Mr. Ramón Rivera and his children, V.R.R. and F.R.R., who have faced significant difficulties during their visits to the establishment. The narrow sidewalk must be widened to allow Mr. Ramón and his children to move safely, as they require sufficient space for proper mobility. Currently, the lack of width on the sidewalk has prevented them from moving comfortably, forcing them to maneuver with difficulty and exposing them to unnecessary risks. Likewise, the access ramp must be reconstructed with the appropriate slope and leveling, eliminating cracks, potholes, and wear that have compromised the stability and safety of V.R.R. and F.R.R. when trying to

enter the establishment. Inside the bakery, it is necessary to reorganize the furniture layout, as the reduced circulation space has made it difficult for Mr. Ramón and his children to move freely, creating obstacles and causing stress and discomfort. The repositioning of elements must ensure that they can navigate independently and without restrictions. Additionally, the inaccessible tables, which have a support bar underneath, must be replaced or redesigned to allow V.R.R. and F.R.R. to approach without barriers and enjoy their visit comfortably. The excessively high counters need to be adjusted to a suitable height so that V.R.R. and F.R.R. can interact with the staff and view the products without having to rely entirely on Mr. Ramón. Similarly, counters without front clearance must have an open space at the base, allowing both children to position themselves comfortably and actively participate in the purchasing process without their mobility being restricted. In the restrooms, it is essential to install universal accessibility signage at the entrance, as the lack of this indicator has made identifying the appropriate restroom difficult, causing uncertainty and frustration for the Rivera family. Additionally, the toilet flush button must be relocated to an accessible position, ensuring that V.R.R. and F.R.R. can use it independently without requiring external assistance. The installation of side and rear grab bars is equally necessary, as their absence has compromised the stability and safety of the children while using the restroom, creating an uncomfortable and stressful experience for both them and Mr. Ramón. Furthermore, the soap and paper dispensers must be installed at an accessible height so that V.R.R. and F.R.R. can complete their hygiene routine without obstacles. Currently, their placement

prevents them from using them independently, which not only limits their autonomy but also creates frustration and an additional burden for Mr. Ramón, who must constantly intervene in activities that should be performed without assistance. Eliminating these barriers will allow Mr. Ramón Rivera and his children, V.R.R. and F.R.R., to access My Sweet Bakery safely and without difficulties, ensuring that they can enjoy their visit without facing obstacles that compromise their mobility, comfort, and well-being. By removing these accessibility issues, My Sweet Bakery will once again become a welcoming place for them, and they will no longer feel dissuaded from returning.

**Responsibility of the Municipality of Arecibo and Farmacia Del Carmen LLC -  
Farmacia Del Carmen**

34. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., frequent Farmacia del Carmen due to the trust they have in the quality of the products and the convenience of being able to find both grocery items and medical products in one place, at affordable prices. They have visited the pharmacy several times during the months of November and December 2024, with their last visit being on January 15, 2025. This establishment has been a regular option for Mr. Ramón and his children due to the convenience and variety of products it offers, making it part of their daily routine. However, during their visits, Mr. Ramón and his children, V.R.R. and F.R.R., personally identified a series of architectural barriers that have hindered their access and mobility within the pharmacy. Due to V.R.R. and F.R.R.'s medical conditions and the use of convoys as their assistive devices, these barriers have severely impacted their comfort and autonomy. The presence of physical obstacles within the establishment has made them feel dissuaded from returning, as the difficulty in moving freely and safely has caused significant discomfort. Despite valuing



the products and services offered, the accessibility barriers have prevented them from enjoying their shopping experience. This situation has reinforced their sense of exclusion and made them seriously reconsider their future visits, feeling deeply dissuaded by the difficulties they face on each visit.

35. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have the intention to return to Farmacia del Carmen during the next three months to continue benefiting from the convenience of the quality products they offer, especially the grocery items they frequently need. But they are dissuaded by the persistent presence of accessibility barriers that hinder V.R.R. and F.R.R.'s mobility within the establishment. Despite their interest in continuing to shop there due to the products and service they value, the difficulties that V.R.R. and F.R.R. faces in trying to move freely and safely inside the pharmacy make them feel dissuaded from returning. The lack of an accessible environment that guarantees their comfort and autonomy prevents them from enjoying their shopping experience. Mr. Ramón and his children, V.R.R. and F.R.R., personally identified the following barriers at Farmacia del Carmen:

- 35.1. Sidewalk in Severe State of Deterioration: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk in front of Farmacia del Carmen, located at Ave. Juan Rosado Carr. #2, Arecibo, PR 00659, with coordinates 18.467269436568635, -66.71803033316827, is in a severe state of deterioration. The surface is marked by deep cracks, sinkholes, and uneven sections that significantly impact their stability and safety while moving along the path. These irregular conditions make the journey uncomfortable and hazardous, forcing them to navigate obstacles that complicate their mobility. For V.R.R. and F.R.R., this

structural damage creates an additional barrier, as they experience abrupt movements due to the sidewalk imperfections, making it difficult for them to maintain balance while using their convoys. The extra effort required to avoid the sinkholes and cracks increases their fatigue and causes joint pain, preventing them from moving with the freedom and safety they need. For Mr. Ramón, this situation adds to his physical strain, as he must constantly remain alert to prevent impacts that could compromise his children's well-being. The lack of maintenance on this sidewalk not only limits their access to the area but also highlights the urgent need for safe and accessible infrastructure for everyone.

35.1.1. The Municipality has the responsibility to ensure that public infrastructure is safe and accessible. Despite having full knowledge of these deficiencies, it has not taken the necessary measures to correct them, which demonstrates a clear inaction regarding a problem that affects the mobility and safety of citizens. This lack of intervention perpetuates discrimination, as it excludes V.R.R. and F.R.R., who are forced to deal with additional difficulties in their mobility. Furthermore, the Municipality's inaction reinforces exclusion, denying them an adequate and safe urban environment, and contributes to inequality, as the necessary measures to ensure equitable access for them have not been taken.

35.2. Lack of Accessible Parking Signage: During their visit to Farmacia del Carmen, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., identified that the accessible parking area lacked proper signage, making it difficult to locate and use. The absence of a clear designation prevented the Rivera family from

immediately identifying the space reserved for individuals with reduced mobility, causing confusion and unnecessary delays when parking. For V.R.R. and F.R.R., this lack of signage created an obstacle upon their arrival at the establishment, as they had to rely entirely on Mr. Ramón to find an appropriate parking space. Without a visible indicator, there was a risk that the designated spots were improperly occupied, further complicating their access and affecting their overall comfort. Mr. Ramón experienced frustration upon noticing this issue, as the absence of signage made parking more challenging and required additional effort to ensure they were in the right location. Instead of finding a clearly marked and efficient access point, he was forced to search for alternatives and manually confirm whether the space met the necessary conditions.

- 35.3. Worn-Out Accessible Parking Area: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., noticed that the paint marking the accessible parking space at Farmacia del Carmen was visibly worn out, making it difficult to identify. Without clear and defined markings, the area designated for individuals with reduced mobility was not easily recognizable, increasing the risk of other vehicles occupying the space improperly. For V.R.R. and F.R.R., this situation added another layer of difficulty when accessing the establishment. Without visible boundaries, they cannot be certain that the designated area was available for their use. The confusion caused by the lack of proper maintenance in the parking markings made the parking process more complicated and stressful. Mr. Ramón, upon noticing the faded paint in the designated area, felt concern and uncertainty while parking. Instead of having a clearly marked and secure space, he

encountered an area that lacked proper definition, failing to provide the functionality his family requires.

35.4. **Parking Lot Without an Accessible Route:** Upon arriving at Farmacia del Carmen, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., encountered a critical issue, as the parking lot lacked an accessible route to the main entrance. The path from the parking area was obstructed by poles and metal bars, making the passage too narrow and inaccessible for their mobility needs. The children, who rely on their respective convoys to move around, were forced to maneuver with difficulty between the obstacles, which caused them physical pain due to the excessive effort required to move their assistive devices in such a limited space. Additionally, the absence of a proper ramp further hindered their ability to enter the establishment. For V.R.R. and F.R.R., this barrier posed an immediate and frustrating challenge. The narrowness of the path caused abrupt movements, increasing the risk of losing balance and causing discomfort in their joints, exacerbating the pain they already experience due to their condition. The lack of a clear and adapted path for their movement compromised their safety and comfort, forcing them to seek complicated and unsafe alternatives just to reach the entrance. Mr. Ramón felt a high level of stress and concern upon realizing that access to the pharmacy was obstructed from the parking lot. The lack of an accessible route forced him to struggle with maneuvering to ensure his children could enter without risk.

35.5. **Narrow Entrance Door:** During their visit to Farmacia del Carmen, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., identified that the entrance door to the

establishment was too narrow, making access difficult. The lack of adequate space at the entrance prevented them from entering smoothly and without obstacles, causing discomfort and unnecessary delays. For V.R.R. and F.R.R., this barrier was an immediate challenge when trying to enter the store. The reduced width of the door made it difficult for them to pass through with their mobility device, forcing them to maneuver with effort and creating an uncomfortable experience. Instead of accessing the store easily, they had to adjust their movements to get through the entrance. Mr. Ramón felt deep concern upon realizing that the entrance did not provide suitable conditions for his children. Instead of a safe and hassle-free entry, they encountered a doorway that compromised their comfort from the very start of their visit.

- 35.6. Excessive High Counters: Inside Farmacia del Carmen, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., encountered another obstacle that affected their experience: the counters were too high, limiting their ability to interact independently with the staff and products. The lack of accessible counter height prevented them from making purchases without barriers. For V.R.R. and F.R.R., this issue restricted their ability to see the products and communicate directly with the staff. Unable to reach the counter area, they had to rely entirely on Mr. Ramón to ask questions, request items, and complete the purchase, limiting their independence inside the establishment. Mr. Ramón felt frustrated seeing how this barrier excluded his children. Instead of allowing them to navigate the store independently, the counter's height imposed an unnecessary limitation that negatively impacted their shopping experience.

35.7. Medication Pickup and Delivery Counter with Accessibility Non-Compliance:

During their visit to Farmacia del Carmen, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., noticed that the medication pickup and delivery counter had a section that did not comply with accessibility standards. The height of the counter was inadequate and it lacked a lower accessible area for V.R.R. and F.R.R., who use convoys, to interact comfortably. This deficiency created an unnecessary barrier that made it difficult for the children to engage with the space and the process of receiving their medications. This limitation prevented V.R.R. and F.R.R. from approaching the counter comfortably and safely, restricting their ability to actively participate in managing their own medications. Without proper access, they had to rely entirely on Mr. Ramón, which affected their independence and caused discomfort. Mr. Ramón felt frustrated upon noticing this barrier, as part of the counter was not adapted to serve his children equally. Instead of having an accessible space that ensured a smooth and uncomplicated experience, they encountered an obstacle that made the medication pickup process more uncomfortable and limiting.

35.8. Restroom Entrance with Uneven Flooring: Mr. Ramón Rivera and his children,

V.R.R. and F.R.R., personally identified that the entrance to the restroom had an uneven surface, making access difficult. The lack of a level entryway or a proper ramp compromised their mobility and created an unnecessary obstacle in an essential area of the establishment. For V.R.R. and F.R.R., this barrier turned a basic necessity into a challenge. The uneven flooring at the restroom entrance made it extremely difficult for them to access with their convoys, which caused

great physical and emotional discomfort. Both children were forced to rely entirely on Mr. Ramón, which further reduced their autonomy. This obstacle caused them frustration, discomfort, and a sense of exclusion, as they were unable to perform such a simple task as using the restroom independently. This emotional harm translated into an experience that not only affected their physical well-being but also their self-esteem and sense of independence. Mr. Ramón was forced to exert himself much more to assist his children, which caused him physical and emotional exhaustion. He had to maneuver and adjust the convays to navigate the uneven flooring, an additional effort that increased his stress levels. By having to constantly assist his children, Mr. Ramón experienced great frustration seeing how his children couldn't move with the same independence as other children in such an ordinary situation.

- 35.9. Lack of Accessibility Signage in the Restroom: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., identified that the restroom lacked universal accessibility signage, making it difficult to locate. The absence of a clear indicator prevented the family from immediately determining whether the restroom was suitable for their needs, causing confusion and unnecessary delays. For V.R.R. and F.R.R., this barrier created an immediate challenge. Without visible signage, they can't confirm if the restroom had the necessary conditions for their access, forcing them to rely entirely on Mr. Ramón to check its accessibility. This lack of clear information caused discomfort and affected their independence within the establishment. Mr. Ramón felt frustrated upon noticing the absence of proper signage, As he had to make extra effort to ensure his children accessed the

restroom without difficulties. A simple and worry-free process turned into an unnecessarily complicated and confusing experience.

- 35.10. Sink with Base: Inside the restroom at Farmacia del Carmen, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., identified that the sink had a base that limited the front space, preventing them from approaching it comfortably. The design of the sink created a barrier that made its use difficult. For V.R.R. and F.R.R., the presence of this base prevented them from positioning themselves properly in front of the sink, which complicated the handwashing process and caused physical discomfort. Since they couldn't approach it properly, the children were forced to make uncomfortable and strained movements to try to use the sink, which affected their autonomy and increased their frustration. This barrier prevented them from performing such a basic and important task independently, which caused them feelings of helplessness and exclusion, further increasing their emotional distress. Mr. Ramón, as the primary caregiver, was forced to interrupt his activities and make additional physical efforts to assist his children. He had to bend down and adjust his children's convoys to allow them to approach the sink, which caused him great physical exhaustion. As he tried to assist them, Mr. Ramón felt increasing stress and frustration as he saw how the barrier prevented his children from completing such simple tasks on their own, which further reduced their autonomy. Additionally, having to constantly help his children with such a routine task as handwashing created a significant emotional burden. Mr. Ramón felt deeply frustrated and helpless, as once again, he had to take on the responsibility



for a task that should have been simple for his children, but became a challenge due to the lack of accessibility.

35.11. Inaccessible Toilet Flush Button: During their visit to Farmacia del Carmen, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., noticed that the toilet flush button was located in an inaccessible position, on the closed side toward the wall, making it difficult to use without assistance. The location of the button in that restricted area prevented V.R.R. and F.R.R. from reaching it easily, as they could not approach comfortably. The lack of an appropriate design prevented them from completing this task independently, causing discomfort and frustration. For V.R.R. and F.R.R., this barrier immediately limited their ability to use the restroom. Unable to reach the button easily, they had to rely on Mr. Ramón to complete a simple and effortless task. This lack of accessibility reduced their independence and turned a routine action into an unnecessary challenge. Mr. Ramón felt discomfort upon noticing this issue, as his intervention became essential in a situation that excludes his children, V.R.R. and F.R.R., from a basic and comfortable experience. Instead of an accessible restroom, they encountered an obstacle that compromised their comfort and created a frustrating experience.

35.12. Restroom Without Rear Grab Bar: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., discovered that the restroom lacked a rear grab bar on the toilet, compromising their stability and safety. For V.R.R. and F.R.R., the lack of this support made it difficult to maintain balance, causing physical discomfort and frustration, as they could not use the toilet with the security they needed. This situation not only affected their physical well-being but also increased their

frustration and sense of vulnerability, as a simple task like using the restroom became an unnecessary and dangerous challenge. Mr. Ramón, as the primary caregiver, was forced to interrupt his own activities and devote his full attention to ensuring that his children could use the toilet without the risk of falls or injuries. This additional effort caused considerable physical and emotional exhaustion for him, as he had to be constantly alert to assist his children and ensure their stability. Furthermore, being aware of the risks involved, Mr. Ramón experienced deep concern and anxiety, knowing that his children's safety was compromised due to the lack of accessibility. Instead of an adapted and safe space that would ensure his children's stability and comfort, Mr. Ramón and his children faced an environment that did not meet the basic conditions to safely perform such an essential activity. This barrier not only affected the children's mobility but also created a frustrating, distressing, and above all, exhausting experience for both the children and Mr. Ramón, who had to take on the responsibility of ensuring his children's safety in an environment that should have been accessible and adapted to their needs.

- 35.13. To ensure accessibility and safety for all users, it is essential to address the barriers identified by Mr. Ramón Rivera and his children, V.R.R. and F.R.R., during their visit to Farmacia del Carmen. First, the deteriorated pavement on the sidewalk in front of the pharmacy presents deep cracks and sinkholes, making it extremely difficult for the children, who use their convoys, to move without experiencing additional pain and fatigue. Furthermore, the lack of proper signage in the accessible parking area prevents the family from easily finding a space

designated for individuals with reduced mobility. This barrier is compounded by the worn-out paint in the accessible parking area, which increases the risk of improper occupation of these spots. Additionally, the lack of an accessible route in the parking lot, with obstacles such as poles and metal bars blocking the path, forces the children to exert unnecessary physical effort just to reach the entrance of the pharmacy. Once inside, the narrow entrance door further complicates access, while the excessively high counters and the inaccessible medication pickup counter limit the children's ability to independently interact with the staff and access their medications. Moreover, the lack of a rear grab bar in the restroom and the inaccessible flush button make using the restroom difficult, causing discomfort and reliance on Mr. Ramón for assistance. The lack of accessibility signage in the restroom and the sink with a base also prevent the children from performing these basic tasks independently, increasing their frustration and reducing their autonomy. In summary, the lack of proper infrastructure and insufficient maintenance perpetuate discrimination and exclusion for people with disabilities, directly impacting the safety, comfort, and well-being of the children and Mr. Ramón. Municipal intervention is urgent to correct these barriers and ensure safe and equitable access for all.

**Responsibility of the Municipality of Arecibo and Gasrico Corporation**  
**Rico Gas**

36. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are interested in Rico Gas due to the urgent need to supply propane gas for their home, essential for cooking and heating. This business is one of the few in Arecibo that supplies propane gas to the municipality, making it their only viable option. Mr. Ramón, as the primary caregiver for his children,

who require constant care due to their reduced mobility and need for assistance with their convoys, must always take them when running errands outside the home. Since he cannot leave his children alone, Mr. Ramón needs to go accompanied by them. Although he has wanted to visit Rico Gas in March 2025, since early February 2025, he has been aware of the architectural barriers that make access and comfort difficult for both him and his children. As a result, Mr. Ramón and his children, V.R.R. and F.R.R. feel dissuaded from visiting the place.

37. Mr. Ramón and his children, V.R.R. and F.R.R., intend to return to Rico Gas within the next two months to supply propane gas, but they are currently dissuaded from doing so due to the persistent presence of accessibility barriers. Mr. Ramón and his children, V.R.R. and F.R.R., personally identified the following barriers at Rico Gas:

37.1. Sidewalk in Poor Condition: The sidewalk located at 113 Juan Rosado, Arecibo, PR 00612-0000, at coordinates 18.46962623180991, -66.71560315610886, is in poor condition, which makes mobility difficult and puts it at risk, especially for V.R.R. and F.R.R., who rely on their convoys to move. The conditions of the sidewalk affect their stability and create additional physical effort, increasing fatigue and discomfort during their journey. Additionally, Mr. Ramón, as their caregiver, is constantly required to be vigilant about his children's safety, which increases his physical and emotional burden.

37.1.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk in front of Rico Gas is in poor condition, with potholes, cracks, and uneven ground. This condition makes it difficult for them to move, as the uneven surface poses a safety risk for everyone, especially for V.R.R.

and F.R.R., who rely on mobility devices. The lack of proper maintenance on the sidewalk increases the time it takes them to reach the establishment and causes discomfort as they have to avoid the potholes and cracks. For Mr. Ramón and his children, this condition turns a simple task into a stressful experience, as they have to stay alert to the irregularities in the ground while trying to move safely. Additionally, the discomfort this causes makes it difficult for them to enjoy their visit and causes distress, as they cannot walk with the ease they need.

37.1.2. Mr. Ramón and his children, V.R.R. and F.R.R., are also aware of the narrowness of the sidewalk in front of Rico Gas. The lack of adequate space prevents them from moving comfortably, especially when they need to navigate with V.R.R. and F.R.R.'s mobility devices. The sidewalk is not only too narrow, but this limitation also makes it difficult for other people to pass, creating an uncomfortable and stressful environment, especially during busier hours. For Mr. Ramón, the difficulty of walking on such a narrow sidewalk makes his visit even more complicated, as he must worry not only about the well-being of his children but also about his own safety and that of others who might be walking in the same area. This lack of proper space increases discomfort and stress when trying to access the location.

37.1.3. Mr. Ramón and his children, V.R.R. and F.R.R. are also aware that the sidewalk is obstructed by various elements such as trash bins and posts, making access to the establishment even more difficult. These obstacles

not only take up space but also pose a safety risk, as they have to maneuver around them, which increases the physical effort required to advance. For V.R.R. and F.R.R., who rely on mobility devices, these obstacles represent an additional danger, as they make it more difficult for them to pass through without constant supervision. Mr. Ramón has to be more vigilant to ensure that his children can safely navigate the area, which adds extra stress and affects the flow of their visit.

37.1.4. Mr. Ramón and his children, V.R.R. and F.R.R. are also aware of the lack of an accessible ramp on the sidewalk. The current design of the sidewalk is not only narrow and inclined but also prioritizes vehicle parking over accessibility. This makes access to the establishment even more difficult for Mr. Ramón and his children, who depend on a proper ramp to move safely. For V.R.R. and F.R.R., the lack of an accessible ramp means they must rely on their father's constant help to navigate the incline of the sidewalk, which prevents them from moving independently. The sidewalk design, instead of facilitating access, presents a significant obstacle, which increases discomfort and frustration during their visit.

37.1.5. It is the Municipality's responsibility to ensure that public infrastructure is safe and accessible for everyone. However, despite being fully aware of the existing deficiencies, it has failed to take the necessary actions to correct them, which reflects a lack of response to an issue that directly affects the safety and mobility of the public. This omission sustains a situation of exclusion for V.R.R. and F.R.R., who face additional barriers

to moving freely. Moreover, the Municipality's inaction deepens this exclusion by failing to provide an adequate and safe urban environment, and it contributes to inequality by not implementing the necessary measures to guarantee them equitable access.

37.2. **Parking Lot Without Accessible Parking Area:** Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the parking lot at Rico Gas lacks an accessible parking area. The absence of designated spaces for individuals with mobility needs creates significant difficulties for the Rivera family. This lack of clearly marked parking spots means they often struggle to find a safe and convenient place to park, further complicating their visit. For Mr. Ramón and his children, this barrier is especially challenging because they must rely on finding a suitable parking space for their vehicle. However, the lack of accessible parking makes this an unnecessarily stressful part of their visit. The inconvenience of not having proper parking options adds to the frustration they experience, making them feel dissuaded from visiting Rico Gas.

37.3. **No Accessible Route to the Main Entrance:** Mr. Ramón and his children, V.R.R. and F.R.R. also face another barrier, as there is no accessible route from the parking lot to the main entrance of Rico Gas. The path leading to the entrance is obstructed or poorly designed, making it difficult for those with mobility devices to safely and independently access the building. For V.R.R. and F.R.R., this lack of an accessible route creates a major challenge, as they are unable to move directly from the parking area to the entrance without requiring significant assistance. The absence of ramps or clear pathways forces Mr. Ramón to find

alternative ways to get his children inside, which complicates a simple transition. The lack of an accessible route increases their stress and discomfort, making the visit unnecessarily difficult.

- 37.4. To ensure the comfort and safety of Mr. Ramón Rivera and his children, V.R.R. and F.R.R., it is crucial to eliminate the architectural barriers that hinder their access to Rico Gas. One of the main solutions is to improve the sidewalk, which is currently in poor condition with potholes, cracks, and uneven ground. This situation poses a safety risk for everyone, especially for those using mobility devices. It is recommended to repair and properly level the sidewalk using durable and safe materials, so that Mr. Ramón and his children can move easily and without obstacles. This will reduce both the time and effort required to reach the establishment, improving the experience from the start. Additionally, the sidewalk should be widened to address the issue of its narrowness. The lack of adequate space prevents comfortable movement, especially when maneuvering with mobility devices. Widening the sidewalk will ensure that Mr. Ramón and his children can walk without difficulty while also allowing other people to pass without inconvenience. This will create a more comfortable and less stressful environment, especially during busier hours. The sidewalk should also be kept clear of obstacles such as trash bins and posts that block the path. It is essential to implement a cleaning and management plan to keep the sidewalk clear at all times. Removing these obstacles will allow Mr. Ramón and his children to safely access the establishment without needing to maneuver through difficulties, reducing the risk of accidents and improving overall comfort. Furthermore,



installing an accessible ramp is a crucial solution to ensure that all users can access the establishment independently and safely. The ramp must meet accessibility standards, be wide, level, and have an appropriate slope. This will allow Mr. Ramón and his children to enter Rico Gas without difficulty, without relying on external assistance to navigate physical barriers.

- 37.5. Regarding parking, it is necessary to create an accessible parking area with clearly marked spaces. These should be wide enough to allow safe and convenient parking for vehicles with people who need assistance to move. Installing visible signs on the ground and at eye level will help Mr. Ramón quickly find a suitable space, eliminating the stress and frustration associated with parking. Finally, an accessible route from the parking lot to the main entrance must be ensured. This route should be free of obstructions and have ramps or suitable pathways to provide safe and direct access to the interior of Rico Gas. Additionally, the use of non-slip materials and the removal of any obstacles will ensure smooth and comfortable access for Mr. Ramón and his children, avoiding unnecessary complications. Implementing these solutions will significantly improve Mr. Ramón and his family's experience at Rico Gas, ensuring an accessible and safe environment for all. By eliminating these barriers, the establishment will not only meet accessibility requirements but also offer a more inclusive and welcoming environment, promoting the autonomy and well-being of its customers.

**Responsibility of the Municipality of Arecibo and Buena Restaurants LLC**  
**Antoninos Pizza-Arecibo**

38. Mr. Ramón Rivera and his children V.R.R. and F.R.R. are drawn to Antoninos Pizza Arecibo due to its exceptional reputation for serving authentic Italian pizza with a Puerto

Rican flair, a combination that has quickly gained popularity in the area. The freshness of the ingredients and the perfect balance of crispy yet soft dough make Antoninos a standout in the local pizza scene, offering a culinary experience that can't be found anywhere else in Arecibo. Known for its welcoming atmosphere and impeccable service, Antoninos has become a place that Mr. Rivera and his children look forward to visiting. They are particularly excited about trying the signature pizzas, which have earned rave reviews for their rich flavors and high-quality ingredients. They have been aware of the establishment's offerings and its charm since December 2024. They plan to visit between May and June 2025 for a family meal, eager to experience the renowned pizza that has become a local favorite. However, despite their strong desire to enjoy the food and ambiance, the persistent accessibility barriers at Antoninos have completely dissuaded them from visiting. The barriers prevent them from accessing the restaurant on equal terms, leaving them discouraged and unwilling to make the trip until these issues are resolved. The barriers that impede their access are:

38.1. Inaccessible Sidewalk: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware that the sidewalk in front of Antoninos Pizza-Arecibo is in poor condition, with cracks, growing weeds, littered with trash, covered in uneven patchwork, with cars parking on the sidewalk, and a lack of curb ramps. This directly affects V.R.R. and F.R.R., who depend on motorized wheelchairs for mobility, as their wheelchairs cannot pass through such obstructions, making it unsafe and frustrating for them to visit the restaurant.

38.1.1. The sidewalk in front of Antoninos Pizza in Arecibo is in poor condition, with cracks, overgrown weeds, and uneven patches. This has caused

V.R.R. and F.R.R., who depend on motorized wheelchairs, extreme difficulty in moving smoothly, as the rough surface disrupts their mobility, and the over grown grass makes the floor slippery and difficult to navigate safely. Their spinal muscular atrophy, which severely limits their strength, requires even pathways for safe and independent movement. The current conditions force them to exert extra effort, increasing the risk of tipping or injury.

38.1.2. The sidewalk in front of Antonino's Pizza - Arecibo has been improperly converted into a parking area, with visible yellow lines marking spaces, suggesting a systematic—rather than incidental—use of pedestrian space for vehicles. These vehicles illegally parked on the sidewalk in front of the establishment block the path in front of the establishment, preventing V.R.R. and F.R.R. from accessing the restaurant. No clear path remains for mobility devices, and their wheelchairs cannot maneuver around the obstacles without assistance. Given their medical condition, which restricts sudden movements or navigating non-adapted terrain, this barrier discriminates against them by denying equal access to a public space.

38.1.3. They also have knowledge that there are no curb ramps at any of the corners of the sidewalk in front of Antoninos Pizza-Arecibo. This deficiency forces them to use vehicle access ramps not designed for wheelchair navigation, creating hazardous transition points between street and sidewalk levels. Their spinal muscular atrophy severely limits their ability to compensate for this architectural barrier through physical

adjustments. The missing curb ramps specifically prevent them from safely aligning their motorized wheelchairs for proper approach angles; maintaining stability during elevation changes; and accessing the restaurant without requiring physical assistance from Mr. Rivera. This fundamental accessibility failure transforms what should be a good dining experience into a physically demanding and dangerous undertaking.

38.1.4. The Municipality of Arecibo is responsible for ensuring that public sidewalks are properly maintained and accessible. The failure to repair the damaged sidewalk, prevent vehicle obstructions, and install necessary curb ramps has directly restricted V.R.R. and F.R.R.'s ability to move independently in their community. By neglecting these necessary improvements, the municipality has perpetuated an environment that excludes them from accessing public spaces like Antoninos Pizza-Arecibo. This inaction constitutes discrimination by denying them the same opportunities for mobility and access that others enjoy.

38.2. Lack of Designated Accessible Parking Space: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware that there is no properly designated accessible parking space at Antoninos Pizza - Arecibo that meet the necessary requirements, such as adequate size, adjacent area, and corresponding signage identifying them as such. This absence allows other drivers who are not persons with disabilities to occupy the spaces closer to the entrance, forcing them to park in further away spaces. Additionally, given that V.R.R. and F.R.R. use motorized wheelchairs due to spinal muscular atrophy — which severely limits their muscle

strength and mobility — the lack of an accessible space makes exiting and entering their vehicle significantly more difficult and unsafe, as their father must maneuver their heavy wheelchairs in cramped conditions without proper access aisles.

38.3. Deteriorated Parking Lot Surface. Additionally, Mr. Ramón Rivera, V.R.R. and F.R.R., are aware that the parking lot at Antoninos Pizza Arecibo contains numerous cracks and overgrown weeds protruding through the pavement. These surface irregularities create an unstable base for their motorized wheelchairs. Because V.R.R. and F.R.R. have spinal muscular atrophy — a condition that prevents them from making postural adjustments or absorbing shocks — the uneven terrain causes uncomfortable vibrations and makes it harder to maintain proper seating position during transfers between their vehicle and wheelchairs, increasing their physical discomfort and risk of injury.

38.4. Unmarked Ramp at the Entrance: Mr. Ramón Rivera, V.R.R. and F.R.R., are aware that the ramp at the entrance to Antoninos Pizza Arecibo lacks proper markings or signage, resulting in vehicles routinely parking directly in front of it, blocking the ramp completely. This barrier directly affects V.R.R. and F.R.R., as they are unable to use the ramp when cars park in the area, leaving them unable to enter the restaurant independently. Their motorized wheelchairs are designed for efficient navigation of ramps, but with the entrance blocked, their movement becomes limited, and they require assistance from their father to access the establishment. Given their condition, which severely impacts their muscle

strength and ability to move unaided, these access issues create an additional layer of difficulty, preventing them from entering the restaurant on their own terms.

- 38.5. High Door Handle: Mr. Ramón Rivera, and his children, V.R.R. and F.R.R., have knowledge that the entrance door handle at Antoninos Pizza Arecibo is positioned at an excessive height. This design directly impacts V.R.R. and F.R.R., whose spinal muscular atrophy severely limits their upper body strength and range of motion. Due to their progressive muscle weakness — which particularly affects their arms and shoulders — they cannot raise their limbs sufficiently to reach or grip the elevated handle from their motorized wheelchairs. The inaccessible handle placement forces them to rely entirely on their father's assistance to open the door, completely eliminating their ability to enter the establishment independently despite using mobility devices designed for autonomy.
- 38.6. Outward-Swinging Door Design. Additionally, they are aware of the outward-swinging door at the entrance. This configuration critically affects V.R.R. and F.R.R. because their spinal muscular atrophy prevents the quick postural adjustments needed to safely reverse their motorized wheelchairs when the door opens toward them. The outward swing requires precise wheelchair maneuvering in confined spaces — a task made impossible by their condition's progressive loss of trunk control and limited ability to perform coordinated movements. This dangerous design forces them to either risk collisions with the opening door or depend on their father to physically intervene, undermining the independence their powered wheelchairs are meant to provide and creating an unnecessary access barrier.

- 38.7. Slippery Floor: Mr. Ramón Rivera, V.R.R. and F.R.R., have knowledge that the floor at Antoninos Pizza Arecibo is slippery and not made of non-slip material. This is a significant concern for V.R.R. and F.R.R., as their motorized wheelchairs are at risk of losing traction on the slick surface. Given their condition of spinal muscular atrophy, which already limits their ability to control their movement, a slippery floor increases the difficulty of navigating the space and heightens accidents. Their motorized wheelchairs require firm, stable surfaces to move safely, and the slippery floor obstructs their ability to move independently and comfortably, making it harder for them to enjoy their visit.
- 38.8. Excessively High Counter: Mr. Ramón Rivera, V.R.R. and F.R.R., have knowledge that the service counter at Antoninos Pizza Arecibo is positioned at an inaccessible height. This presents significant difficulties for V.R.R. and F.R.R., whose spinal muscular atrophy causes severe muscle weakness and chronic fatigue. Due to their condition they cannot raise their arms for extended periods to reach the high counter without experiencing muscle pain and exhaustion; their limited trunk control prevents them from leaning forward safely in their motorized wheelchairs; and the effort required to strain upward exacerbates their respiratory muscle weakness. This architectural barrier forces them to either suffer physical discomfort when attempting to interact with staff or rely completely on their father to communicate and conduct transactions, effectively excluding them from normal customer interactions. It also denies them dignity in basic service encounters.

- 38.9. Inaccessible Tables Design: Mr. Ramón Rivera, V.R.R. and F.R.R., are also aware that the central support structure of the tables at Antoninos Pizza Arecibo obstructs the approach for wheelchair users. This obstruction prevents V.R.R. and F.R.R. from getting close enough to sit at the tables. Their motorized wheelchairs require ample space to maneuver, and the central support blocks their access, leaving them unable to enjoy a meal with their family at the restaurant. This issue directly impacts their experience, as their spinal muscular atrophy prevents them from making the postural adjustments or upper-body reaches required to compensate for the excessive table distance. The resulting muscle fatigue from prolonged straining transforms what should be an enjoyable family outing to a physically stressful and emotionally exclusionary event.
- 38.10. Narrow Bathroom Doors: Finally, Mr. Ramón Rivera and his children have knowledge that the bathroom doors at Antoninos Pizza Arecibo are too narrow. This directly affects V.R.R. and F.R.R., as their motorized wheelchairs are unable to fit through the tight doorways. Their condition of spinal muscular atrophy already makes it difficult for them to maneuver independently, and the narrow doors create a physical barrier that further limits their ability to use basic facilities. This lack of accessibility forces them to depend on their father for assistance and prevents them from accessing the restroom without significant difficulty.
- 38.11. To make Antonin's Pizza - Arecibo accessible for V.R.R. and F.R.R., the Municipality of Arecibo must address the following barriers. The sidewalk should be repaired and cleared of all obstructions, ensuring a smooth and accessible path,



and measures should be implemented to prevent vehicles from parking on the sidewalk. Curb ramps should be installed at every corner to facilitate the safe entry of wheelchair users. On the other hand, Buona Restaurants LLC, could make the establishment more accessible by the following solutions. The entrance ramp should be clearly marked to prevent vehicles from blocking it, and the door design should be modified to allow for easy access, including lowering the handle and ensuring it opens inward. The floor should be treated with a non-slip floor coating or paint to improve traction and prevent accidents. Accessible tables should be provided with clear space for wheelchairs, and central supports should be repositioned to allow for better access. The bathroom doors should be widened to accommodate motorized wheelchairs, and the counter height should be adjusted to allow for easier interaction with staff. These changes would greatly improve the accessibility of Antoninos Pizza Arecibo and encourage Mr. Rivera and his children to visit the restaurant without barriers hindering their experience.

- 38.12. Furthermore, the Municipality of Arecibo has failed to enforce accessibility regulations and has unlawfully allowed Antoninos Pizza Arecibo to operate without ensuring proper access for individuals with disabilities. By permitting the establishment to operate without addressing the significant barriers, such as the occupation of the public right of way, parking obstructing the sidewalk, the lack of accessible parking, the Municipality has directly contributed to V.R.R. and F.R.R.'s exclusion. This failure to uphold accessibility standards reinforces their perception of discrimination, as they are systematically denied the ability to

access and navigate the restaurant on equal terms, preventing them from enjoying the dining experience.

**Responsibility of the Commonwealth Of Puerto; Municipality of Arecibo and Paradise B.B.Q. Inc. - Paradise B.B.Q.**

39. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., want to visit Paradise B.B.Q. because they enjoy traditional Puerto Rican food and appreciate the opportunity to experience new flavors and culinary traditions as a family. They have heard excellent reviews about the restaurant's generous portions, well-seasoned dishes, and the authenticity of its flavors, which reflect the richness of Puerto Rican gastronomy. Additionally, they value places with a welcoming atmosphere where they can relax and enjoy quality time together. For them, dining out is not just about eating but also about creating meaningful experiences, sharing conversations, and momentarily disconnecting from the daily challenges they face due to V.R.R. and F.R.R.'s health conditions. However, since November 2024, they have known that the place has architectural barriers that, due to their health conditions, affect their accessibility. This knowledge discourages them from visiting. In December 2024, as well as in January and February 2025, they have wanted to go to Paradise B.B.Q. to enjoy its highly recommended meals, such as rice, beans, churrasco in mushroom sauce, and malanga in escabeche, and to experience the friendly service and peaceful location. Despite their interest, they feel discouraged from visiting because the architectural barriers make it difficult for V.R.R. and F.R.R. to access the establishment comfortably and safely.
40. Over the next three months, Mr. Ramón Rivera, V.R.R., and F.R.R. want to visit Paradise B.B.Q. because they want to try the restaurant's famous chicken, which many consider the best in Arecibo. Also they want to share a pleasant dining experience as a family,

enjoy the flavors of Puerto Rican cuisine, and explore the place together. However, the existing accessibility challenges for V.R.R. and F.R.R. to access the establishment dissuade them from going. The architectural barriers at Paradise B.B.Q., which Mr. Ramón Rivera and his children, V.R.R. and F.R.R. are aware of, include the following:

40.1. Barriers on the Sidewalk in Front of Paradise B.B.Q.: Mr. Ramón Rivera, along with his children, V.R.R. and F.R.R., identified multiple barriers on the sidewalk in front of Paradise B.B.Q. located at Hwy. 129, San Luis Avenue, Marginal 963, Arecibo, PR 00613-0000, with coordinates 18.461016700883295, -66.73856010886783 that severely affect the children's mobility. The sidewalk has cracks and uneven pavement, creating a hazardous surface that makes it difficult for V.R.R. and F.R.R. to navigate safely in their convoy. Additionally, vehicles are frequently parked on the sidewalk, obstructing their path and forcing them to look for alternative routes.

40.1.1. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have noticed that vehicles frequently park on the sidewalk in front of Paradise B.B.Q., blocking their path. Since V.R.R. and F.R.R. rely entirely on their convoy for mobility, they cannot maneuver around the cars as a person walking might. When the sidewalk is obstructed, they are forced to move onto the street, exposing them to traffic, and taking a long, inconvenient detour, which is frustrating and tiring. This creates unnecessary delays and discomfort, making their visit to the restaurant a stressful and unpleasant experience. Because of this, Mr. Ramón Rivera and his children, V.R.R. and F.R.R. feel discouraged from visiting the restaurant.

40.1.2. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have noticed that the sidewalk in front of Paradise B.B.Q. has cracks and uneven pavement, making it difficult for V.R.R. and F.R.R. to move safely in their convoy. The irregular surface causes their convoy to shake and jolt unexpectedly, making the ride uncomfortable and sometimes even painful. Additionally, deeper cracks and gaps in the pavement cause the smaller front wheels of their chairs to get stuck, requiring extra effort to maneuver out of these spots. This makes reaching the restaurant a frustrating and tiring experience, rather than a smooth and enjoyable outing. Because of this, Mr. Ramón and his children, V.R.R. and F.R.R. feel discouraged from visiting the restaurant.

40.1.3. The Commonwealth of Puerto Rico is responsible for ensuring that public sidewalks located at Hwy. 129, San Luis Avenue, Marginal 963 are maintained in safe and accessible conditions. However, the presence of deteriorated and uneven pavement, along with vehicles parked on the sidewalk in front of Paradise B.B.Q., has severely impacted the mobility of Mr. Ramón Rivera and his children, V.R.R. and F.R.R. Despite being aware of these obstacles, the authorities have failed to take corrective measures, allowing these barriers to persist. This inaction has resulted in a discriminatory situation that restricts their ability to navigate public spaces safely and independently, further excluding them from full participation in daily activities.

- 40.2. Deteriorated and Uneven Pavement in the Parking Area: Mr. Ramón Rivera, V.R.R., and F.R.R. know that the parking area of Paradise B.B.Q. has deep cracks and uneven surfaces. The wheels of V.R.R. and F.R.R.'s convoy get caught in the cracks, causing sudden jolts that make them feel unstable and unsafe. The uneven pavement also forces them to make constant adjustments to their convoy positions, requiring additional effort that strains their bodies. These difficulties not only make entering the restaurant physically exhausting but also increase the risk of discomfort and pain due to the sudden impacts from the rough terrain. Because of these challenges, Mr. Ramón and his children, V.R.R. and F.R.R. feel discouraged from going to the establishment.
- 40.3. Brown Carpet at the Entrance Door: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware that a brown carpet is placed at the entrance of Paradise B.B.Q.; This carpet creates a significant problem for V.R.R. and F.R.R., as the texture and thickness make it harder for their convoy to roll smoothly. When they attempt to enter, the wheels encounter resistance, causing their convoy to slow down and momentarily get stuck, requiring them to apply extra force to continue moving. Additionally, if the edges of the carpet are slightly lifted and wrinkled, their front wheels catch on it, creating a sudden stop that makes it uncomfortable and frustrating to enter. This obstacle makes their arrival at the restaurant challenging, which is why they feel discouraged from visiting.
- 40.4. Buffet Counter Too High: While inside Paradise B.B.Q., Mr. Ramón Rivera, V.R.R., and F.R.R. have realized that the brown buffet counter is too high for V.R.R. and F.R.R. to reach from their convoy. When they attempt to see the

available food options, they must tilt their heads back and strain their necks just to get a glimpse of what is being offered. They are unable to comfortably pick up plates, serve themselves, and even point clearly to what they want, making them completely dependent on someone else to describe the choices and serve them. This takes away their independence and makes the dining experience frustrating rather than enjoyable. Because of this, Mr. Ramón Rivera and his children, V.R.R. and F.R.R. feel discouraged from eating at the restaurant.

40.5. Shallow Buffet Counter: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have noticed that the buffet counter at Paradise B.B.Q. is too shallow, making it difficult for them to get close enough in their convoy. Since the counter does not extend out far enough, V.R.R. and F.R.R. cannot comfortably position their arms to reach the food. Their convoy remains slightly behind the counter's edge, forcing them to stretch their arms uncomfortably forward, which is tiring and frustrating. This limitation prevents them from interacting with the buffet in the same way as other diners, making them feel excluded from the experience. Because of this, Mr. Ramón and his children, V.R.R. and F.R.R., feel unmotivated to visit the restaurant.

40.6. Metal Bars Blocking Access to the Buffet Counter: Mr. Ramón Rivera, V.R.R., and F.R.R. know about the presence of gray metal bars obstructing the buffet counter at Paradise B.B.Q.; For V.R.R. and F.R.R., navigating around these bars requires precise movements and extra effort due to the limited space. Since the convoy requires a certain turning radius, these barriers make it difficult for them to maneuver smoothly, often leading to frustrating attempts to reposition

themselves. At the buffet counter, the metal bars create additional obstacles, forcing them to stretch uncomfortably to see and access. These barriers make the dining experience unnecessarily complicated, which is why Mr. Ramón and his children, V.R.R. and F.R.R. feel discouraged from going to the restaurant.

40.7. Table Arrangement Limiting Maneuverability: Inside Paradise B.B.Q. Inc., Mr. Ramón Rivera, V.R.R., and F.R.R. are aware of difficulties due to the table arrangement, which creates narrow pathways. The space between tables is too tight, making it difficult for V.R.R. and F.R.R. to navigate without bumping into chairs and having to stop and readjust their positioning. Since their convoy requires enough space to turn, they often find themselves stuck in tight spots and having to wait for someone to move a chair to make room. This makes moving around the restaurant frustrating and time-consuming, disrupting the overall dining experience. Because of this, Mr. Ramón and his children, V.R.R. and F.R.R. feel discouraged from dining at the restaurant.

40.8. Tables with Black Support Bars Underneath: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have also noticed that the tables at Paradise B.B.Q. have black support bars underneath, which significantly reduce the available legroom. When V.R.R. and F.R.R. attempt to position their convoy under the table, these bars prevent them from getting close enough to sit comfortably. As a result, they are forced to sit at an awkward distance from the table, making eating difficult and uncomfortable. This setup makes them feel out of place and limits their ability to enjoy their meal as other customers do. Because of this, they feel discouraged from going to the restaurant.

40.9. The barriers at Paradise B.B.Q. could be eliminated by repaving the sidewalk and parking area to create a smooth, even surface free of cracks and irregularities. Vehicles parked on the sidewalk should be prevented by avoiding parking on the sidewalk through clear signage. The brown entrance mat should be replaced with a thin, slip-resistant mat that does not obstruct convoy movement. The buffet counter should be lowered and extended to provide accessible reach and space for convoy users. The metal bars blocking access should be removed or repositioned to allow an unobstructed path to the counter. The table layout must be adjusted to ensure sufficient clearance for convoy circulation, avoiding tight or blocked pathways. Finally, tables with black support bars underneath should be replaced or modified with a design that allows comfortable seating. These adjustments can significantly improve accessibility, ensuring V.R.R. and F.R.R. can visit and enjoy the restaurant without unnecessary obstacles.

40.10. Additionally, the Municipality of Arecibo has failed to enforce accessibility regulations by allowing Paradise B.B.Q. to operate without ensuring proper access. By granting permits despite the presence of physical barriers at the entrance and inside the establishment, the Municipality has directly contributed to the exclusion of Mr. Ramón and his children, V.R.R. and F.R.R. This continued failure to uphold accessibility standards results in a situation of discrimination and exclusion, making it difficult for them to access the establishment's services.

**Responsibility of the Municipality of Arecibo and Adorno's Bakery, Corporación Adorno's Bakery Corporation**

41. Mr. Ramón Rivera, and his children V.R.R. and F.R.R. want to visit Adorno's Bakery Corporation because they appreciate traditional Puerto Rican pastries and the comforting



flavors that remind them of homemade treats. They are excited to try the bakery's highly praised sugar donuts, known for their soft texture and perfect balance of sweetness. Mr. Rivera, who enjoys a good cup of coffee, looks forward to tasting the bakery's high-quality brew, while V.R.R. and F.R.R. are eager to enjoy freshly baked bread that is well known for its flavor and warmth. The family values places where they can sit together and share a delicious meal, and Adorno's Bakery Corporation offers a variety of options that make it an ideal spot for them to enjoy quality time while indulging in good flavors. However, since November 2024, they have known that the place has architectural barriers that, due V.R.R. and F.R.R. health conditions affect their accessibility. These barriers discourage them from visiting. In February and March 2025, they have wanted to go to Adorno's Bakery Corporation to experience the warm atmosphere and enjoy the famous mallorcas filled with ham, cheese, and butter, as well as the delicious sandwiches like El Fortaleza and El Montecristo. However, the architectural barriers make them feel discouraged from going.

42. In the next four months, Mr. Ramón Rivera, along with V.R.R. and F.R.R., wants to visit the bakery to enjoy a good breakfast together, taste the freshly made pastries, and share a pleasant moment as a family. They look forward to experiencing the bakery's warm atmosphere, savoring the freshly brewed coffee, and indulging in the famous sugar donuts and sandwiches that many customers praise. Nevertheless, the accessibility barriers at Adorno's Bakery Corporation make them feel dissuaded from visiting. Mr. Ramón Rivera, and his children V.R.R. and F.R.R. know that the barriers at this location include the following:

42.1. Barriers on the Sidewalk in Front of Adorno's Bakery Corporation: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware of barriers on the sidewalk in front of Adorno's Bakery Corporation located at 953 San Luis Avenue, Arecibo, PR 00612-3899, with coordinates 18.46146626449315, -66.73809339985306. The pavement is deteriorated and uneven, making safe mobility difficult. Additionally, vehicles parked in front of the establishment obstruct access to the sidewalk.

42.1.1. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., know that the deteriorated and uneven pavement on the sidewalks makes it extremely difficult for them to move. Since V.R.R. and F.R.R. both convoy, the cracks, holes, and height differences in the pavement cause them to tilt, shake, and get stuck. This forces them to stop frequently, adjust their movements, and take detours, increasing their effort and discomfort. These conditions make it exhausting and unsafe for them to access the bakery. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting Adorno's Bakery Corporation.

42.1.2. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., know that the cars parked at the entrance block their ability to access the sidewalk and the entryway. Since both use convoy, they cannot maneuver between tightly parked vehicles, leaving them with no choice but to move along the street, where they are exposed to traffic. The difficulty in finding a safe path to the entrance forces them to wait for assistance. For this reason, Mr. Ramón

Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting Adorno's Bakery Corporation.

42.1.3. The Municipality of Arecibo is responsible for maintaining public sidewalks in safe and accessible conditions. However, its failure to address the deteriorated and uneven pavement, along with the persistent issue of vehicles blocking access to the sidewalks in front of Adorno's Bakery Corporation, has created significant barriers for Mr. Ramón Rivera and his children, V.R.R. and F.R.R. Despite being aware of these accessibility issues, the municipality has not taken action to correct them, allowing conditions that hinder their mobility and limit their ability to navigate the area safely. This inaction has resulted in a discriminatory situation that restricts their access to public spaces and essential services, further deepening their exclusion.

42.2. Lack of Accessible Route to the Entrance: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., know that the lack of an accessible route to the entrance makes it confusing and frustrating to enter the establishment. Since V.R.R. and F.R.R. use a convoy, they need a clear path to find the best way in. Without an accessible route, they have to search for a suitable entrance, which results in unnecessary detours and requires assistance from others. This lack of accessibility makes their entry process slow and inconvenient. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting Adorno's Bakery Corporation.

- 42.3. Display Cases That Are Too High: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware that the height of the display cases prevents V.R.R. and F.R.R. from seeing and choosing products independently. Since they remain seated, their line of sight is below the display area, making it impossible for them to see what is available. They have to rely on someone else to describe the items and pick them for them, which takes away their ability to make choices on their own. This prevents them from enjoying the experience of selecting what they want. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting Adorno's Bakery Corporation.
- 42.4. Brown Counter That Is Too High: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., know that the height of the brown counter prevents V.R.R. and F.R.R. from interacting with staff and handling their orders by themselves. Since they use convoy, the counter is positioned above their reach, making it impossible for them to place an order, hand over payment, and pick up their drinks. They must ask someone else for help every time, which makes them feel dependent and limits their ability to participate in the experience like other customers. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel dissuaded from visiting Adorno's Bakery Corporation.
- 42.5. Brown Counter That Is Too Shallow: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., know that the shallow brown counter makes it difficult for them to use comfortably. Since they remain seated, V.R.R. and F.R.R. cannot pull up close enough to rest their drinks and food securely on the surface. This forces them to balance items awkwardly on their laps and hold them uncomfortably, increasing

the risk of spills. This lack of space makes ordering and eating at the counter inconvenient. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from going to Adorno's Bakery Corporation.

42.6. Tables with Support Bars Underneath: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., know that tables with support bars underneath prevent them from sitting close enough to eat and drink comfortably. Since they use convoy, the bars block them from getting under the table, forcing them to stay at a distance. This makes it difficult for them to reach their food, requiring them to lean forward in an uncomfortable position. Eating in this way is tiring and inconvenient, making their experience unpleasant. For this reason, Mr. Ramón, V.R.R., and F.R.R., feel discouraged from visiting Adorno's Bakery Corporation.

42.7. Table Arrangement That Obstructs Circulation: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., know that the way the tables are arranged inside the establishment blocks their ability to move freely. Since they use convoy, they need enough space to navigate between tables without getting stuck. The tight arrangement forces them to squeeze through narrow spaces and stop and wait for others to move chairs, making their movement slow and frustrating. This restriction prevents them from comfortably reaching a table and moving around the bakery as other customers do. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting Adorno's Bakery Corporation.

42.8. The barriers at Adorno's Bakery Corporation could be eliminated by repairing and leveling the pavement on sidewalks to remove cracks and uneven surfaces that

make access difficult, while maintaining clear pedestrian paths. Additionally, signage should be installed to prevent vehicles from parking on the sidewalks, ensuring unobstructed access. An accessible route should be clearly marked, guiding Mr. Ramón Rivera and his children, V.R.R. and F.R.R. directly to the entrance. Display cases should be lowered or angled for better visibility, allowing them to see and choose products independently. The brown counter must be lowered to an accessible height so they can interact with staff, place orders, and handle payments without assistance, while its depth should be increased to provide enough space for resting items securely. Tables with support bars underneath should be replaced or modified to allow them to sit comfortably and reach their food without obstruction. The arrangement of tables must be adjusted to create wider pathways, ensuring they can move freely without struggling through narrow spaces. By implementing these specific changes, the property can provide an inclusive and accessible environment that allows Mr. Ramón Rivera and his children to navigate and participate fully in the experience.

- 42.9. Moreover, the Municipality of Arecibo has neglected its responsibility to enforce accessibility regulations, allowing Adorno's Bakery Corporation to operate with significant barriers that hinder entry and movement within the establishment. By approving permits without ensuring compliance with accessibility standards, the Municipality has directly contributed to the exclusion of Mr. Ramón and his children, V.R.R. and F.R.R.

**Responsibility of the Municipality of Arecibo and Marilyn's Restaurant Inc.**  
**Marilyn's Restaurant**

43. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have been eager to experience Marilyn's Restaurant since January 2025, when they learned about the new location that opened in Arecibo. Through social media posts and glowing recommendations from family members, they discovered its renowned authentic Puerto Rican cuisine. The establishment's signature mashed plantain dish, prepared with a traditional family recipe that dates back generations, and their exceptional meat-filled pastries, praised as reminiscent of grandmother's cooking, represent culinary treasures that Mr. Rivera and his children particularly desire to enjoy. Mr. Rivera has specifically planned a dinner visit to Marilyn's Restaurant for early June 2025 to enjoy their special weekend seafood paella, attracted by the restaurant's warm ambiance and reputation for accommodating groups with personalized service.
44. However, since January 2025, however, Mr. Rivera and his children have become aware of several architectural barriers at the establishment. These barriers directly discourage them from going together as a family to experience the unique dishes and celebrated atmosphere that Marilyn's Restaurant exclusively offers in the area, as they value establishments where the entire family can dine comfortably and with dignity. Despite the strong desire to patronize this establishment known for its authentic home-style cooking and cultural significance in the community, Mr. Rivera, and his sons, V.R.R. and F.R.R. feel deterred from visiting due to the following barriers that prevent them from accessing:
- 44.1. Inaccessible Sidewalk Conditions: V.R.R. and F.R.R., along with their father Mr. Ramón Rivera, have knowledge that the sidewalk leading to Marilyn's Restaurant is in extremely poor condition, featuring cracks, overgrown vegetation, and

inadequate width. This barrier primarily impacts the disabled children V.R.R. and F.R.R.'s ability to approach the establishment, as their powered wheelchairs cannot safely navigate such compromised pathways, while also forcing Mr. Rivera to provide constant intervention. The narrow width of the sidewalk prevents the children from moving side by side, forcing them to travel in single file, which eliminates Mr. Rivera's ability to assist both children simultaneously. The uneven surface and vegetation create obstacles that interrupt the smooth operation of their powered wheelchairs, causing uncomfortable movements that exacerbate the physical discomfort already experienced due to their spinal muscular atrophy.

44.1.1. The Municipality of Arecibo bears direct responsibility for ensuring that public sidewalks within its jurisdiction remain accessible to all residents and visitors, including those with disabilities who require mobility devices. The deteriorated sidewalk conditions that Mr. Ramón Rivera and his children, V.R.R. and F.R.R. are aware of, represent a failure of the municipality to maintain these essential public pathways in a condition that accommodates wheelchair users. The current state of disrepair forces V.R.R. and F.R.R. to navigate hazardous conditions that their non-disabled peers do not face, effectively denying them equal access to public spaces and nearby businesses.

44.2. Absence of Designated Accessible Spaces: Mr. Ramón Rivera and his children V.R.R. and F.R.R. are aware that Marilyn's Restaurant lacks properly marked accessible parking spaces with the International Symbol of Accessibility, as well



as an accessible loading zone for passengers. This barrier directly affects V.R.R. and F.R.R., who rely on powered wheelchairs for mobility due to their spinal muscular atrophy, and additionally impacts Mr. Rivera who must assist his children. The absence of designated accessible parking spaces means Mr. Rivera struggles to find suitable parking that provides enough space to safely deploy the wheelchair ramp from their vehicle. Without an accessible loading zone, Mr. Rivera is forced to transfer his children from the vehicle to their powered wheelchairs in standard parking spaces that are too narrow, creating an unsafe environment in the active parking area and causing significant stress for both the children and their father.

- 44.3. Deteriorated Parking Lot Surface: Furthermore, both Mr. Ramón Rivera and his children V.R.R. and F.R.R. have direct knowledge that the parking lot at Marilyn's Restaurant has a severely deteriorated surface with multiple cracks throughout. This barrier primarily affects V.R.R. and F.R.R., whose powered wheelchairs struggle to navigate over these uneven surfaces, while also creating additional burden for Mr. Rivera who must provide extra assistance. The cracks in the pavement cause jarring movements and uncomfortable vibrations that are particularly problematic for the children who have limited muscle control due to their spinal muscular atrophy. The unstable surface forces Mr. Rivera to push the powered wheelchairs manually over certain sections, negating the independence that these assistive devices are designed to provide and causing unnecessary physical strain on Mr. Rivera who must compensate for the inadequate infrastructure.

- 44.4. Excessively High Service Counter: Finally, both V.R.R. and F.R.R., who have disabilities requiring powered wheelchairs, and their father Mr. Ramón Rivera directly know that inside Marilyn's Restaurant, the service counter stands at an excessive height that is inaccessible to wheelchair users. This barrier primarily affects the disabled children V.R.R. and F.R.R., as they are unable to see over the counter, interact with staff, or participate in the ordering process from their powered wheelchairs, while also requiring Mr. Rivera to act as an intermediary. The disproportionate height creates a physical barrier that separates the children from standard customer interactions, forcing them to rely completely on their father for communication with restaurant staff. This arrangement undermines their autonomy and reinforces feelings of exclusion and dependency, directly contradicting the sense of independence that their powered wheelchairs are intended to provide. Mr. Rivera must constantly intercede on behalf of his children, preventing them from engaging in age-appropriate social interactions that are crucial for their emotional development despite their physical limitations from spinal muscular atrophy.
- 44.5. To resolve the identified obstacles that prevent V.R.R., F.R.R., and Mr. Ramón Rivera from accessing Marilyn's Restaurant, two separate entities must take action. The Municipality of Arecibo needs to repair and maintain the public sidewalks by filling cracks, removing overgrown vegetation, and widening the pathways to accommodate powered wheelchairs, ensuring safe and dignified access for all community members with mobility disabilities. As for Marilyn's Restaurant, the establishment should implement several critical modifications:

designate and properly mark accessible parking spaces with the International Symbol of Accessibility; create a dedicated passenger loading zone adjacent to the entrance; resurface the parking lot to eliminate cracks and create a smooth, stable surface for wheelchair navigation; and lower a portion of the service counter to an accessible height that allows wheelchair users to independently interact with staff. Implementing these necessary modifications would eliminate the current deterrents that prevent them from enjoying the restaurant's renowned Puerto Rican cuisine, and V.R.R., F.R.R. and their father would enthusiastically visit the establishment once these accommodations are in place.

- 44.6. Additionally, the Municipality of Arecibo has failed to fulfill its critical oversight role by granting operational permits to Marilyn's Restaurant despite the establishment's non-compliance with accessibility requirements. By authorizing a business that lacks essential accommodations such as properly designated accessible parking, the municipality has actively contributed to the exclusion of V.R.R. and F.R.R. This governmental failure effectively sanctions discrimination, as it allows commercial establishments to operate while systematically excluding wheelchair users from equal participation. The municipality's permitting practices have directly impacted Mr. Ramón Rivera and his children, who cannot access services that are readily available to non-disabled residents. Proper enforcement of accessibility standards by the Municipality and implementation of necessary modifications by Marilyn's Restaurant would enable Mr. Rivera and his children to finally enjoy the establishment with dignity and independence.

**Responsibility of the Municipality of Arecibo and Tima Corp.**  
**Poco Loco Arecibo**

45. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., want to visit Poco Loco Arecibo because Mexican food is one of their great passions. The family enjoys the intense and authentic flavors this cuisine offers, and Poco Loco Arecibo is the perfect place to satisfy their love for these dishes. The Monterrey chicken breast, with its juicy grilled chicken, BBQ sauce, cheese, and bacon, is a dish that catches Mr. Ramón's attention, who looks for a flavorful and satisfying meal. On the other hand, V.R.R. and F.R.R. are drawn to the chicken tacos and sautéed shrimp, options that allow them to explore a variety of fresh and delicious flavors. For them, visiting the restaurant is an opportunity to enjoy a delicious meal together in a cozy atmosphere, sharing special moments as a family while savoring the best of Mexican cuisine. However, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have been aware since November 2024 of the existence of architectural barriers at Poco Loco Arecibo. Despite their desire to visit the restaurant in December 2024 and January 2025, they have not done so because of this situation. The knowledge of the barriers has dissuaded them, as they feel concerned about accessibility and comfort during their visit.
46. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have the intention to visit Poco Loco Arecibo within the next three months to taste the chicken tacos. However, they are currently dissuaded by the continued presence of accessibility barriers, which raises concerns about comfort and accessibility during their visit. The barriers that Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware of are:
- 46.1. Inaccessible sidewalk: Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the three significant barriers on the sidewalk located in front of Poco Loco

Arecibo, situated at Av. Jose De Diego 325, Arecibo, PR 00612-0000, with coordinates 18.472130687369898, -66.7227537312851 that affect their mobility. The sidewalk is deteriorated, with cracks and uneven surfaces that severely hinder movement, especially for V.R.R. and F.R.R., who rely on a Convoy device. These irregularities increase the risk of falls and trips, causing discomfort and additional effort while walking. Additionally, the sidewalk is narrow, further limiting the available space for safe movement. The lack of sufficient space forces the children to maneuver carefully in a tight environment, raising the feeling of vulnerability. Compounding these issues, vehicles are constantly parked in front of the establishment's sidewalk, creating a physical barrier that seriously obstructs their access. This inappropriate occupation of pedestrian space forces the family to perform dangerous and complicated maneuvers to navigate around obstacles, exposing V.R.R. and F.R.R. to unnecessary risks and generating feelings of frustration and helplessness when they see their entry route blocked. For V.R.R. and F.R.R., these physical barriers are not only a physical challenge but also an emotional one, as they feel more exposed to potential hazards. Mr. Ramón, as their caregiver, faces a constant challenge in ensuring the safety of his children, which adds to his physical and emotional exhaustion due to the ongoing effort and constant concern for their well-being.

- 46.1.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk is deteriorated, with cracks and uneven surfaces that severely hinder their movement. These damages significantly affect V.R.R. and F.R.R., who, due to their reliance on a Convoy device, are especially

vulnerable to tripping and falling. The cracks and changes in elevation not only pose a physical risk of falls but also increase discomfort as the children must exert extra effort to maintain balance and stability. The lack of proper maintenance worsens the conditions of the sidewalk, making it even harder for the children to move with the safety and independence they require. This added strain on them, along with the constant concern of their caregiver, Mr. Ramón turns every journey into a physical and emotional challenge for all of them.

- 46.1.2. Sidewalk Obstruction: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that vehicles are constantly parked in front of the establishment's sidewalk, creating a physical barrier that seriously hinders their access. This inappropriate occupation of pedestrian space forces the family to perform dangerous and complicated maneuvers to navigate around obstacles, exposing V.R.R. and F.R.R. to unnecessary risk situations. For V.R.R. and F.R.R., this obstruction represents a significant impediment that limits their mobility and generates feelings of vulnerability and helplessness when they see their entry route blocked. The Convoy device they use to move cannot adequately transit through this invaded space, causing them frustration and anxiety about the uncertainty of being able to access the premises. For Mr. Ramón, this situation considerably increases his physical effort and emotional tension, as he must devise improvised and potentially unsafe alternatives for his children to reach the establishment, intensifying his exhaustion as a caregiver and the stress.

46.1.3. Additionally, Mr. Ramón and his children, V.R.R. and F.R.R., are also aware that the sidewalk is excessively narrow, making it difficult for them to move, especially for the children who rely on the Convoy device. The lack of sufficient space creates a sense of insecurity and vulnerability as the children must maneuver carefully in such a tight area. This narrowness increases the risk of falls or accidents, as mobility devices require more space to move safely. For V.R.R. and F.R.R., maneuvering on such a narrow sidewalk is not only physically challenging but also emotionally taxing, as they feel more exposed to potential hazards. Mr. Ramón, as their caregiver, faces the added challenge of needing to stay close to prevent any accidents, which leads to physical and emotional exhaustion as he constantly worries about the safety of the children.

46.1.4. It is the Municipality's responsibility to ensure that public infrastructure is both safe and accessible for all individuals. However, despite being fully aware of the existing issues, it has not taken the required steps to address them, highlighting a lack of action regarding a matter that directly impacts public safety and mobility. This failure perpetuates a situation of exclusion for V.R.R. and F.R.R., who encounter extra challenges to move freely. Furthermore, the Municipality's lack of intervention intensifies this exclusion by not providing a proper and secure urban environment, and it contributes to inequality by neglecting to implement the necessary measures to ensure they have equal access.

- 46.2. Main Entrance Obstructed: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the main entrance of the restaurant is obstructed by a rug in the interior area, which significantly hinders access to the establishment. This rug creates a direct barrier for V.R.R. and F.R.R., who rely on their convoys as mobility devices. The obstruction causes discomfort and increases the risk of falls, as the convoys may get stuck or trip over the rug, further hindering their movement. The additional effort they must make to navigate this obstacle interferes with their autonomy and safety, making it more difficult for them to access the restaurant.
- 46.3. Inaccessible Tables: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the tables in the restaurant are inaccessible due to a central support bar located in the lower area, which prevents the children, V.R.R. and F.R.R. from approaching them properly with their convoys. At the same time, this structure prevents V.R.R. and F.R.R. from sitting comfortably and safely at the table, limiting their ability to enjoy a meal at the restaurant in a dignified manner. The barrier forces them to stay away from the table, creating frustration and isolation as they cannot fully integrate into the space.
- 46.4. High Counters: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the customer service and transaction counter is too high, which creates a significant barrier to accessing the restaurant's services. The height of the counter prevents V.R.R. and F.R.R., who rely on their convoys as mobility devices, from interacting properly with the staff, as they find it difficult to reach or communicate with those on the other side of the counter. This barrier limits their



autonomy and creates a sense of exclusion, as they cannot complete transactions independently.

- 46.5. Counter Without Accessible Front Space: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the customer service and transaction counter lacks an accessible front space, as it is obstructed by a row of chairs. This obstacle prevents the children from approaching the counter properly with their convoys, limiting their ability to interact with the staff or complete transactions autonomously. The lack of clear, accessible space at the front of the counter creates discomfort and frustration, as they are forced to rely on their caregiver's constant assistance for actions that require direct contact.
- 46.6. Narrow Circulation Space: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the circulation space in the restaurant is limited due to the tables and chairs being placed too closely together, significantly narrowing the passage. This arrangement makes it difficult for the children to move freely, as they must navigate their convoys through a cramped space. The lack of adequate space to move creates discomfort and increases the risk of falls, compromising the children's safety. Additionally, the narrow aisles make it harder to access the tables or move between the different areas of the restaurant, preventing the children from fully enjoying the experience. For Mr. Ramón, this barrier translates into an additional burden, as he must constantly assist his children to prevent them from tripping or feeling uncomfortable, which increases his physical and emotional exhaustion. The lack of accessible circulation space highlights the urgent need to create a more inclusive and safe environment.

- 46.7. Absence Of Identification For Adapted Sanitary Services: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the establishment lacks the international accessibility emblem to distinguish the adapted restroom. This omission of standardized visual symbols causes disorientation and wastes crucial moments while they try to find appropriate facilities for their specific requirements. For V.R.R. and F.R.R., this informational void triggers uneasiness and discouragement as they are unable to promptly recognize a protected environment where they can satisfy their elementary needs. V.R.R. and F.R.R. perceive a marked feeling of marginalization when forced to travel through various spaces in search of a usable restroom, which accentuates their physical exhaustion due to their condition. For Mr. Ramón, this impediment represents supplementary tension and persistent emotional deterioration as he is forced to improvise alternatives in the face of uncertainty, aggravating his responsibility as a protector.
- 46.8. Extremely Narrow Bathrooms: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the bathrooms are extremely narrow, with very limited space that is further obstructed by a trash basket. This spatial limitation completely prevents the maneuverability of the Convoy device used by the children, exposing them to situations of risk and frustration. The children suffer a serious impact on their dignity and autonomy by not being able to use the bathroom properly, causing them anxiety and emotional distress whenever they need to access these facilities. The inability to move freely in this reduced space generates feelings of forced dependence and vulnerability in V.R.R. and F.R.R., while for Mr. Ramón it

represents a significant increase in the physical effort required, increasing his daily wear and tear as a caregiver.

- 46.9. Excessively Heavy Bathroom Doors: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the bathroom doors are excessively heavy, requiring considerable force to open. Due to the muscular and spinal atrophy (SMN1 condition) suffered by V.R.R. and F.R.R., it is physically impossible for them to open these doors by themselves, causing them frustration, helplessness, and a profound sense of limitation. This barrier aggravates their condition by denying them the possibility of developing independence in basic personal hygiene activities, negatively affecting their self-esteem and psychological development. The children experience an intense feeling of restriction and exclusion when facing these insurmountable doors, which become permanent symbols of their limitations. For Mr. Ramón, the constant effort of opening these heavy doors while managing his children's Convoy device considerably increases his daily physical and emotional burden.
- 46.10. Unreachable Toilet Flushing Mechanism: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the device to operate the toilet flush is installed in the closed section of the wall, making it totally unreachable. This inappropriate arrangement prevents the children from operating it autonomously, forcing them to require constant help to complete a fundamental personal hygiene activity. For V.R.R. and F.R.R., this obstacle provokes feelings of incapacity and embarrassment by not being able to execute such a private and necessary task on their own, seriously injuring their honor and personal value. The inaccessibility of the mechanism

continuously reminds them of their restrictions, causing contrariety and undermining their emotional balance. For Mr. Ramón, this circumstance entails an additional and uninterrupted commitment that intensifies his physical and psychological exhaustion, as he must remain available on each occasion to assist his children with this elementary need, without the option of encouraging their independence.

- 46.11. To resolve the various barriers affecting Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to make the necessary adjustments to ensure a safer and more accessible environment. To address the sidewalk issues, the area must undergo proper maintenance, including repairing cracks and uneven surfaces that pose a significant risk to V.R.R. and F.R.R. These repairs would allow for a smoother, safer path, providing the children with the space and security they need to navigate comfortably in their Convoy devices. Widening the sidewalk would also reduce the feeling of vulnerability and provide more space for movement. It is also fundamental to prohibit parking in front of the sidewalk through clear signage and protective bollards, thus eliminating the physical barrier that seriously obstructs access and preventing the family from performing dangerous maneuvers around parked vehicles. Regarding the restaurant entrance, removing or replacing the obstructive rug would eliminate the hazard it creates, allowing V.R.R. and F.R.R. to enter the restaurant with ease. A rug-free entrance would minimize the risk of the Convoy devices getting stuck, enabling the children to approach the space without additional effort or fear of falling. The restaurant tables should be redesigned to remove or adjust the central support bar that

currently prevents V.R.R. and F.R.R. from accessing the seating area. By creating an open space under the table, the children would be able to approach and sit comfortably in their Convoy devices, promoting their independence and dignity while dining. The height of the customer service and transaction counter should be reduced to a more accessible level, ensuring that V.R.R. and F.R.R. can interact directly with the staff. By adjusting the counter height, the children would have the ability to complete transactions independently. Similarly, the counter should be redesigned to provide clear, accessible space at the front, free from obstructions such as rows of chairs. This change would allow the children to approach the counter with their Convoy devices, facilitating their participation in transactions or interactions. To address the circulation space issues within the restaurant, rearranging tables and chairs to create more space between them would allow V.R.R. and F.R.R. to move freely and safely in their Convoy devices. Wider aisles would reduce the risk of falls, ease the children's movement, and create a more comfortable environment for everyone. It is imperative to install international accessibility signage in the bathrooms, significantly expand their space by removing obstructing elements such as trash baskets, install lighter doors with easy-opening mechanisms, and relocate toilet flush buttons to reachable positions. These improvements would allow V.R.R. and F.R.R. to use the sanitary facilities with greater autonomy and dignity, eliminating the physical barriers that currently limit their independence.

**Responsibility of the Municipality of Arecibo and NGP Caribe LLC**  
**La Guira Restaurant & Lounge**

47. Mr. Ramón Rivera, along with his children, V.R.R. and F.R.R., wants to visit La Guira Restaurant & Lounge because of its excellent food, welcoming service, and relaxed family-friendly atmosphere. They are eager to enjoy its diverse menu, which includes flavorful dishes like rice with ham, chicken breast with cheese sauce, red beans, and fresh melon juice. V.R.R. and F.R.R. are especially excited about the appetizers, such as slider burgers and cheese balls, as well as the chance to try the unique Avocado Guira. Additionally, they look forward to experiencing the restaurant's famous fried cheesecake for dessert. Since December 2024, they know that the restaurant has architectural barriers that, due V.R.R. and F.R.R. health conditions affect their accessibility, making them feel discouraged from visiting. In January and February 2025, they have wanted to go because they want to try the food that is excellent, enjoy the service that is warm and friendly, and the atmosphere casual and family-oriented. They are especially interested in trying the well-seasoned rice with ham, the chicken breast with cheese sauce and the red beans. However, despite their desire to go, they feel discouraged due to the architectural barriers at La Guira Restaurant & Lounge.
48. In the next two months, Mr. Ramón Rivera, along with his children, V.R.R. and F.R.R., wants to visit La Guira Restaurant & Lounge not only to enjoy its highly praised dishes, including the Avocado Güira, but also to share a special moment as a family in a comfortable and welcoming environment. They are particularly drawn to the variety of flavors the restaurant offers, from its well-seasoned main courses to its refreshing natural juices. V.R.R. and F.R.R. are excited about trying new foods and experiencing the joy of dining out in a space where they can relax and enjoy each other's company. However, the

barriers at the restaurant that affect the accessibility of V.R.R. and F.R.R. discourage them from going. The barriers Mr. Ramón and his children, V.R.R. and F.R.R. are aware of at La Guira Restaurant & Lounge are the following:

48.1. Sidewalks in front of La Guira Restaurant & Lounge with Cracks and Holes: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., know that the sidewalks in front of La Guira Restaurant & Lounge are the following located at 321 Av. Jose De Diego, Arecibo, PR 00612-0000, with coordinates 18.472236978604332, -66.72258674906895 are deteriorated with cracks and holes that make V.R.R. and F.R.R. mobility is extremely difficult. Since V.R.R. and F.R.R. use convoy, the uneven surface causes constant jolts that affect their body control, making them feel unstable and uncomfortable. Their reduced muscle strength prevents them from compensating for sudden movements, which makes each jolt physically exhausting. When the convoy's wheels get stuck in a hole, Mr. Ramón Rivera intervenes immediately, as V.R.R. and F.R.R. cannot push themselves forward due to their muscle weakness. These obstacles slow them down and require additional effort, making even a short distance to the restaurant an exhausting task. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting La Guira Restaurant & Lounge.

48.1.1. It is the responsibility of the Municipality of Arecibo to ensure that public sidewalks are properly maintained and accessible to all residents. However, the sidewalks in front of La Guira Restaurant & Lounge remain in poor condition, with cracks and potholes that create serious obstacles for Mr. Ramón Rivera and his children, V.R.R. and F.R.R. Despite the

clear need for repairs, the municipality has failed to address these hazards, leaving the sidewalks unsafe and difficult to navigate. This ongoing inaction has directly contributed to the exclusion and mobility challenges they face

48.2. Tables Blocking Access to the Main Door: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., notice that the placement of the outdoor tables near the entrance makes it difficult for them to access the main door. Since V.R.R. and F.R.R. use convoy, they require a clear and direct path, but the tables force them to maneuver in tight spaces, which is challenging because they lack the muscle strength to make repeated adjustments. When trying to navigate through the restricted area, their convoy gets too close to the tables, and V.R.R. and F.R.R. struggle to avoid bumping into them, as they cannot reposition themselves quickly. The effort required to get through increases their fatigue, and V.R.R. and F.R.R. depend on Mr. Ramón Rivera and others to move obstacles out of the way. This constant difficulty makes them feel frustrated before even entering the restaurant. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting La Guira Restaurant & Lounge.

48.3. Customer Service Counter That Is Too High: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware that the height of the gray customer service counter makes it impossible for V.R.R. and F.R.R. to interact with the staff independently. Since V.R.R. and F.R.R. remain seated in convoy, their arms and hands do not reach the surface of the counter, preventing them from placing an order and retrieving items on their own. Their limited upper body strength makes it difficult



for them to lift their arms for extended periods, which adds to their discomfort when trying to communicate with the staff. They rely entirely on Mr. Ramón Rivera to order and receive their food, which takes away their ability to manage this simple task by themselves. This situation makes them feel excluded from the dining experience. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from going to La Guira Restaurant & Lounge.

48.4. Customer Service Counter That Is Too Shallow: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., realize that the shallow gray customer service counter creates additional difficulties when they interact with the staff. Since V.R.R. and F.R.R. use a convoy, they need space in front of them to place their items securely. However, the limited depth of the counter forces V.R.R. and F.R.R. to balance their food on their laps, which is a challenge due to their reduced muscle control. Holding drinks and food for prolonged periods strains their arms, and the risk of spilling increases because they cannot react quickly to adjust their grip. This makes the process of collecting and handling their order uncomfortable and tiring. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the restaurant.

48.5. Narrow Pathways Between Tables: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware about the difficulty moving inside the restaurant due to the narrow pathways between tables. Since V.R.R. and F.R.R. use convoy, they require sufficient space to navigate smoothly, but the tight layout forces V.R.R. and F.R.R. to make multiple small adjustments, which is physically demanding due to their limited muscle strength. Every movement requires extra effort, and

they frequently have to stop to reposition themselves. When passing close to other tables, V.R.R. and F.R.R. struggle to avoid accidental contact because they cannot shift their body weight easily. The constant stops and adjustments make moving through the restaurant slow and exhausting, turning a simple task into a frustrating challenge. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting La Guira Restaurant & Lounge.

48.6. Tables with Support Bars Underneath: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., recognize that the tables with support bars underneath prevent V.R.R. and F.R.R. from positioning themselves comfortably. Since V.R.R. and F.R.R. remain in convoy, they need to slide under the table to have a stable and accessible eating position. However, the support bars block V.R.R. and F.R.R.'s convoy from moving forward completely, leaving them at an awkward distance. Because of V.R.R. and F.R.R. limited upper body strength, they struggle to lean forward for long periods, making it difficult to reach their food without assistance. The discomfort of sitting too far from the table affects their ability to eat properly, forcing them to rely on Mr. Ramón Rivera to help adjust their positioning. This situation makes mealtimes challenging. For this reason, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from going to La Guira Restaurant & Lounge.

48.7. The barriers at La Guira Restaurant & Lounge could be eliminated by repairing the deteriorated sidewalks to create a smooth and stable surface, ensuring that the convoy can move without sudden jolts. The tables blocking access to the main door should be rearranged to provide a clear and direct path, allowing free

movement without requiring excessive maneuvering. The gray customer service counter must be lowered to a reachable height, ensuring direct interaction without assistance. Additionally, the counter should be deep enough to allow items to be placed securely without the risk of spills. The pathways between tables must be widened to facilitate smooth navigation with the convoy, reducing the need for frequent stops and adjustments. Tables with support bars underneath should be replaced or modified to allow proper positioning, enabling comfortable seating and access to the dining surface. These changes would remove the physical difficulties present in the establishment, improving ease of access and overall comfort.

- 48.8. Additionally, the Municipality of Arecibo has failed to uphold accessibility regulations by allowing La Guira Restaurant & Lounge to operate with significant barriers that obstruct entry and movement within the establishment. By issuing permits without ensuring compliance with accessibility requirements, the Municipality has directly contributed to the exclusion of Mr. Ramón and his children, V.R.R. and F.R.R. The absence of accessible routes makes it extremely difficult for them to enter and navigate the restaurant safely. As both children rely on convoy for mobility, these obstacles impose unnecessary burdens, limiting their ability to move freely and access the services offered. This ongoing failure to enforce accessibility standards creates a discriminatory and exclusionary environment, ultimately discouraging them from visiting the establishment.

**Responsibility of the Municipality of Arecibo and Tony's Cafe LLC**  
**Adis**

49. Mr. Ramón and his children, V.R.R. and F.R.R., share a special fondness for coffee-based beverages. Particularly, they appreciate the versatility offered by drinks such as latte with its perfect balance between espresso and creamy milk, cappuccino with its characteristic foam that especially delights the children, and mocha which masterfully combines the flavor of chocolate with coffee, the latter being one of V.R.R.'s favorites due to its moderate sweetness. For F.R.R., cappuccino represents a unique sensory experience thanks to the velvety texture of its foam. Mr. Ramón, for his part, prefers more intense preparations that highlight the natural nuances of the coffee bean. This shared appreciation for coffee creations is precisely why they are interested in visiting Adis, known for its innovative and elaborate coffee specialties. The family is particularly drawn to drinks like the Nutella Mocha with its indulgent Nutella rim, Oreo crumbles, and whipped cream topping that would surely delight V.R.R. given his preference for chocolate-coffee combinations. F.R.R. has expressed excitement about trying the Hot Pink Coffee, a coconut latte adorned with Nutella, coconut flakes, and whipped cream that promises the velvety texture he enjoys. However, since December 2024, Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the existence of architectural barriers at Adis that have significantly affected their desire to visit the establishment. Although on several occasions during January and February 2025, they have contemplated the possibility of going to the establishment, they have felt deterred due to the barriers at the location.
50. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have the intention to visit Adis during the next five months to enjoy their products, especially their Nutella Mocha and

Hot Pink Coffee, which have become options that spark their interest. However, they are currently discouraged from doing so due to the persistent presence of accessibility barriers. The following obstacles, of which Mr. Ramón Rivera and his children are aware, reinforce their decision to avoid going until these problems are resolved. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the following barriers at Adis:

50.1. Deteriorated Sidewalk: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the sidewalk presents severe deterioration characterized by a highly irregular surface, with multiple potholes distributed along the path and even weed growth invading several sections of the surface. This deficient condition creates significant obstacles for the mobility of V.R.R. and F.R.R., who depend on their Convoy devices to move around. The irregularities of the terrain generate uncomfortable vibrations and abrupt jolts in their mobility devices, exposing the children to possible destabilization and falls. For V.R.R. and F.R.R., navigating this uneven terrain is physically exhausting and emotionally stressful, as they must maintain constant vigilance to avoid the present dangers. The weeds growing between the cracks not only increase transit difficulties but also evidence the lack of proper maintenance, creating an additional barrier that severely limits their independence and safety when trying to access the establishment.

50.1.1. The Municipality has the responsibility to ensure accessibility in public spaces, including proper maintenance of sidewalks so they are passable by all citizens. However, despite being fully aware of the deteriorated state of the sidewalk in front of Adis, with its numerous potholes, irregular surfaces, and invasive weeds, the Municipality has chosen inaction. This

lack of response to a known problem directly perpetuates discrimination against V.R.R. and F.R.R., denying them equal access to community services. The indifference shown to these unacceptable conditions demonstrates a systematic failure to protect the specific rights of V.R.R. and F.R.R. By not prioritizing the necessary repairs, the Municipality is actively contributing to maintaining barriers that isolate V.R.R. and F.R.R. from full participation in daily activities, reinforcing discriminatory patterns that accessibility legislation precisely seeks to eliminate.

50.2. Deteriorated Access Ramp: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the ramp connecting the sidewalk to the main entrance shows notable deterioration, characterized by multiple deep cracks and pronounced potholes that create a highly irregular surface. These structural imperfections prevent V.R.R. and F.R.R. from moving safely in their Convoy devices, constantly exposing them to the risk of destabilization and possible falls. The poor condition of the ramp forces the children to exert extraordinary physical effort to overcome these irregularities, generating unnecessary fatigue and frustration. For V.R.R. and F.R.R., this obstacle represents a significant barrier that compromises their dignity and autonomy, severely limiting their ability to access the establishment independently and safely. This situation also creates an additional burden for Mr. Ramón, who must provide constant assistance to overcome these difficulties.

50.3. Narrow Main Entrance Door: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the main entrance door has insufficient dimensions that do not meet adequate accessibility standards. This narrowness completely prevents the

comfortable passage of the Convoy devices used by V.R.R. and F.R.R., creating a situation where entering the establishment is practically impossible without performing complicated and potentially dangerous maneuvers. For the children, this spatial restriction generates a profound sense of exclusion as they are literally blocked by an architectural design that does not consider their basic mobility needs. The physical barrier that this narrow door represents denies them the opportunity to fully participate as customers of the establishment, directly affecting their right to access public spaces on equal terms. Mr. Ramón is forced to exert additional physical effort to help his children overcome this barrier.

- 50.4. Excessively High Chairs: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the chairs located in front of the counters present an excessive height that is completely inadequate for their needs. This disproportionate elevation prevents V.R.R. and F.R.R. from using them safely and comfortably, as the transfer from their Convoy devices to these chairs involves significant risks due to the height difference. The children experience profound frustration at being unable to sit properly to enjoy the products offered, being forced to remain in their mobility devices in uncomfortable positions or even to completely give up the experience. This barrier directly affects their dignity and comfort, depriving them of the possibility to fully participate in such a basic activity as sitting appropriately during a visit to the establishment. For Mr. Ramón, this represents an additional challenge in having to find alternatives for his children to participate comfortably.

- 50.5. High Counters: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the transaction and customer service counters have an excessive height that does not meet accessibility standards. This disproportionate elevation prevents V.R.R. and F.R.R. from properly interacting with staff, viewing the products offered, or participating in basic aspects such as indicating their preferences or receiving their orders directly. The children experience a sense of invisibility and exclusion when they cannot reach the counter surface from their Convoy devices, being forced to completely depend on assistance for any interaction. This architectural barrier severely limits their ability to communicate and express their preferences during their visit, directly affecting their dignity during their visit to the establishment. Mr. Ramón must constantly intervene as an intermediary, increasing his burden as a caregiver.
- 50.6. Counters with Inaccessible Front Space: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the transaction and customer service counters are obstructed by a row of chairs located at the front, creating a physical barrier that prevents direct approach. This inadequate arrangement of furniture makes it impossible for V.R.R. and F.R.R. to appropriately approach with their Convoy devices, forcing them to maintain a distance that significantly hinders communication and interaction with staff. The children experience frustration and bewilderment when encountering this obstacle that denies them direct access to the services offered, reinforcing their perception of being treated differently and inequitably. The lack of a clear and accessible front space at the counters represents a clear limitation to their right to receive equal treatment, negatively impacting their experience as



customers. For Mr. Ramón, this situation creates additional complications by having to reorganize the space or request assistance.

- 50.7. Inaccessible Tables: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the establishment's tables are designed with a structural bar in the lower area that completely hinders the approach of users with mobility devices. This element prevents V.R.R. and F.R.R. from properly positioning their Convoy devices under the table surface, forcing them to maintain an uncomfortable distance that considerably complicates the normal use of the table for eating or other activities. The children experience a profound feeling of marginalization when they are physically excluded from being able to use the tables like other customers, having to adapt to uncomfortable and inadequate body positions to consume food. This structural barrier directly affects their social participation and dignity during the gastronomic experience, severely limiting their enjoyment of the products offered. Mr. Ramón finds himself needing to implement improvised solutions to assist his children, which increases his level of effort during the visit.
- 50.8. Narrow Circulation Space: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that the arrangement of tables and chairs in Adis presents a serious accessibility problem, as they are located too close to each other. This inadequate layout creates extremely narrow walkways and circulation spaces that do not allow for the proper transit of the Convoy devices used by V.R.R. and F.R.R. The children experience a profound sense of restriction and unease when they find themselves unable to navigate freely through the establishment, constantly having to calculate whether they can pass between obstacles or not. This spatial

limitation forces them to perform complicated and potentially dangerous maneuvers to move around, or directly prevents them from accessing certain areas of Adis. The narrowness of the circulation space represents a clear physical barrier that compromises their autonomy and safety, depriving them of fully enjoying the environment and services offered. Mr. Ramón must remain constantly alert to help his children navigate these narrow passages, increasing his physical effort during the visit.

50.9. No Accessible Bathroom Signage: Mr. Ramón and his children, V.R.R. and F.R.R. are aware that Adis completely lacks signage indicating the existence and location of an accessible bathroom. This absence of essential visual information creates confusion and uncertainty for V.R.R. and F.R.R., who cannot quickly identify whether there is a sanitary facility adapted to their needs or where it is located. The children experience distress and concern about the possibility of needing to use the bathroom and not knowing if they will find adequate conditions to do so with dignity and autonomy. The lack of clear and standardized signage represents an informational barrier that unnecessarily complicates their planning and decision-making during the visit, affecting their confidence and comfort at Adis. This omission also conveys an implicit message of disregard for their specific needs, reinforcing their perception of exclusion. For Mr. Ramón, this situation creates additional stress as he has to investigate on his own the availability and location of appropriate facilities for his children.

50.10. To effectively eliminate the barriers identified at Adis, a comprehensive accessibility plan is required that specifically addresses each obstacle. The

deteriorated sidewalk must be completely reconstructed, removing all cracks, potholes, and weeds to create a uniform, stable, and safe surface that allows risk-free movement of the Convoy devices used by V.R.R. and F.R.R. The access ramp needs a total renovation, leveling irregularities and ensuring an appropriate slope that meets accessibility standards, thus facilitating a safe transition between the sidewalk and the establishment's entrance. The main entrance door must be replaced or modified to widen it, guaranteeing sufficient dimensions for the comfortable passage of mobility devices without requiring complicated maneuvers. Regarding the interior space, it is essential to redistribute tables and chairs to create wide, clear circulation aisles that allow free movement of V.R.R. and F.R.R. throughout the establishment. Existing tables should be replaced with models without structural bars in the lower area, allowing Convoy devices to be correctly positioned under the surface for comfortable and dignified use. The service and transaction counters need to be redesigned to an accessible height that facilitates direct interaction between V.R.R. and F.R.R. and the staff, and it is imperative to eliminate all frontal obstacles, such as the row of chairs, that currently prevent approach to these counters. The excessively high chairs located in front of the counters should be replaced with alternatives of appropriate height that allow safe transfer from mobility devices. Finally, it is necessary to implement a clear, visible signage system in accordance with universal accessibility symbols, specifically indicating the location of accessible bathrooms within the establishment. These structural and design modifications would not only resolve the barriers that currently deter Mr. Ramón and his children from

visiting Adis, but would also create a truly inclusive environment where they can enjoy with autonomy and dignity the coffee specialties and other experiences that the establishment offers.

**Responsibility of the Municipality of Arecibo and NGP Caribe LLC**  
**Arasibo Steak House**

51. Since January 2025, V.R.R. and F.R.R., along with their father, Ramón Rivera, have shown great interest in visiting Arasibo Steak House. They are aware that the house's complimentary bread is delicious and that the food, in general, is fresh and well-seasoned. They also know that the atmosphere of the restaurant is very pleasant, with a perfect ambiance and background music that contributes to a delightful experience. Despite their interest in trying the restaurant's dishes, they have not gone yet due to their knowledge of the accessibility barriers present. V.R.R. and F.R.R. and their father know that due to their health conditions and the use of convoys, they would be exposed to situations of discrimination, which makes them hesitant about the comfort and inclusion during their visit, which is why they have not yet decided to go. As a result, they feel disheartened about going to visit the restaurant.
52. However, V.R.R. and F.R.R., along with Ramón Rivera, plan to visit Arasibo Steak House in four months. They are determined to try the delicious seasoned meats and other dishes that have caught their interest. Despite the challenges and their awareness of the barriers, they remain hopeful that they will be able to enjoy the restaurant's offerings without further obstacles. V.R.R. and F.R.R. and Mr. Ramón are aware of the following barriers at Arasibo Steak House:
  - 52.1. Sidewalk Obstructions: V.R.R., F.R.R., and their father, Ramón Rivera, have knowledge that the sidewalks are narrow and uneven, making it difficult for them

to move with their convoys. Every bump and obstruction forces Ramón to assist them. Illegally parked vehicles block the path, increasing the difficulty. Additionally, the area near the sidewalk, with tightly arranged tables and chairs, is inaccessible for the children, limiting their mobility and requiring Ramón to find alternate routes.

52.1.1. V.R.R., F.R.R., and their father, Ramón Rivera, have knowledge that the sidewalks in the area are extremely narrow and uneven, presenting a serious challenge for V.R.R. and F.R.R., who rely on convoys to move. Due to their muscle weakness, V.R.R. and F.R.R. face additional difficulties maneuvering on the uneven surfaces, making it hard for them to move independently. Every bump and narrow space becomes a considerable obstacle, forcing Ramón to provide constant assistance. This ongoing need for support not only adds physical strain to V.R.R. and F.R.R., but also limits their autonomy, as they cannot move freely. The presence of illegally parked vehicles on the sidewalks further exacerbates the situation by blocking the path, forcing Ramón to maneuver around the cars. This increases the time and effort needed to travel even short distances. V.R.R. and F.R.R. are not only affected by these physical barriers but also experience a heightened sense of isolation by being unable to move like other children their age.

52.1.2. V.R.R., F.R.R., and their father, Ramón Rivera, have knowledge that the area adjacent to the sidewalk, occupied by large pots, wooden columns, and closely arranged tables and chairs, is completely inaccessible to

V.R.R. and F.R.R. The tables are placed so closely together that V.R.R. and F.R.R. cannot pass through with their convoys, severely limiting their mobility. This lack of space prevents V.R.R. and F.R.R. from moving independently, forcing them to rely entirely on their father to get around. Ramón, seeing that his children cannot enjoy the space freely, must constantly look for alternate routes, which increases the time and effort he must spend assisting them. The lack of accessible paths inside the establishment also prevents them from fully participating in the experience, isolating them from an activity that others can enjoy without barriers. These physical difficulties profoundly impact the autonomy of V.R.R. and F.R.R., highlighting the significant barriers they face in their daily lives.

- 52.1.3. The Municipality of Arecibo is fully aware of the situation regarding the narrow, uneven, and obstructed sidewalks, as well as the lack of accessibility in the area adjacent to the sidewalk, but has taken no action to address these barriers. By allowing vehicles to illegally park on the sidewalks and failing to ensure accessible pathways inside the establishment, the municipality perpetuates discrimination against V.R.R. and F.R.R., who suffer due to their health conditions and the difficulties they face every day. The municipality's lack of action reinforces an unequal situation that continues to harm these individuals, denying them access to an environment that is as accessible and fair as any other citizen's.

- 52.2. Tables with Bases Blocking Access: V.R.R., F.R.R., and their father, Ramón Rivera, have knowledge that inside the establishment, the tables have bases that act as obstructions underneath, preventing the children from approaching them from the front or sides. This presents a significant barrier for them, as they rely on proximity to the tables to interact or enjoy activities at the establishment. For Ramón Rivera, this barrier means constantly adjusting his own position and that of his children, which adds to the discomfort. The obstruction at the bottom of the tables also makes it difficult for the children to access the table in situations where sitting and socializing are required, further limiting their experiences in the place.
- 52.3. Counter Too High: V.R.R., F.R.R., and their father, Ramón Rivera, have knowledge that the bar counter is too high, making it inaccessible for the children, who use convoys. Due to their muscle weakness and health condition, they cannot get close enough to the counter to interact comfortably and with dignity. For Ramón Rivera, this barrier presents an additional challenge, as he must be present to assist his children with basic tasks like ordering or making a purchase. The lack of appropriate adaptation in the counter not only affects the children's independence but also the comfort and functionality of the family's interaction with the establishment.
- 52.4. Counter Lacking Depth: V.R.R., F.R.R., and their father, Ramón Rivera, have knowledge that the counter lacks the necessary depth for an adequate frontal approach, which makes it even more inaccessible for the children when using their convoys. This lack of depth prevents the children from getting close enough, making interactions with staff or making purchases more complicated. Ramón

Rivera also faces difficulties, as he must constantly assist his children, which increases the effort and time required to perform these interactions as smoothly as possible, adding another layer of burden.

- 52.5. Lack of Space for Mobility Within the Establishment: V.R.R., F.R.R., and their father, Ramón Rivera, have knowledge that the interior of the establishment does not have adequate space for people with disabilities to move around, primarily due to improperly positioned tables, making it impossible for the children to navigate independently within the premises. The confined areas and poorly arranged furniture inside the establishment prevent them from enjoying the facilities the same way others can. For Ramón Rivera, this means he has to intervene constantly, which increases the effort and time needed for basic activities, such as moving from one area to another inside the establishment.
- 52.6. Obstruction of the Counter by a Row of Chairs: V.R.R., F.R.R., and their father, Ramón Rivera, have knowledge that there is a row of chairs in front of the counter that obstructs access, making it even more difficult to interact with the staff. The chairs block the path and prevent the children from getting close enough to the counter to make transactions or ask for assistance. For Ramón Rivera, this represents another challenge, as he has to move the chairs or find alternative ways to access the counter, which adds extra physical and emotional strain to the process.
- 52.7. High Chairs in Front of the Counter: V.R.R., F.R.R., and their father, Ramón Rivera, have knowledge that the chairs in front of the counter are too high, making it impossible for people with mobility problems, like the children, to use



them properly. Due to their condition, they cannot get into these chairs without assistance, depriving them of the ability to sit easily in the area. Ramón Rivera, as their primary caregiver, has to deal with this barrier, as he is forced to assist his children not only in using the chair but also in finding alternatives so they can participate in the establishment's activities. This barrier also limits the children's autonomy and independence, as they rely on their environment being accessible in order to fully enjoy the experience.

- 52.8. To address the accessibility barriers on the Arasibo Steak House and the sidewalks in front of it, the Municipality of Arecibo must implement a series of urgent solutions. First, the sidewalks should be repaired and widened to ensure they are wide and level enough to allow the convoys to pass without obstacles. Additionally, proper parking signs and fines should be enforced for vehicles blocking the sidewalks, eliminating the issue of illegal parking. On the property, the tables should be rearranged with enough space between them to allow V.R.R. and F.R.R. to move freely with their convoys, and the bases of the tables must be modified to allow for a frontal and lateral approach. The counter should be adapted in both height and depth to ensure the children can access it comfortably without constant assistance from their father. It is also essential to remove the high chairs in front of the counter and install accessible seating for people with mobility impairments, as well as ensuring there are no obstructions like rows of chairs blocking access to the counter. Inside the establishment, an accessible route must be installed to allow V.R.R. and F.R.R. to move independently and without barriers. These actions would not only remove the physical barriers but also

improve the quality of life and independence of the children, allowing them to enjoy the space like anyone else, without the need for constant assistance from their father.

- 52.9. Additionally, the Municipality of Arecibo has failed to enforce accessibility regulations by allowing Arasibo Steak House to operate with barriers at the establishment. Furthermore, the Municipality has neglected to repair the damaged and uneven sidewalks, further restricting access. By allowing these conditions to persist, the Municipality is creating a situation of discrimination and exclusion that directly affects V.R.R. and F.R.R. The poor condition of the sidewalks and the lack of accessible routes make it impossible for them to navigate safely, forcing them to find alternative paths that add unnecessary difficulty and physical strain. These combined obstacles prevent them from entering, moving through the space, and accessing services, ultimately discouraging them from visiting the business.

**Responsibility of the Commonwealth Of Puerto, Municipality of Arecibo and Caribbean Wraps Inc Inc. - Caribe Wraps**

53. V.R.R. and F.R.R., along with their father, Ramón Rivera, are interested in visiting Caribe Wraps because they know that the establishment offers excellent service and food quality. They are aware that the vegetables are always fresh, the wraps are among the best, and there is a wide variety of proteins, plant-based options, and vegetables. They also know that the breakfast is excellent. However, since February 2025, they have been aware of the accessibility barriers at the location, and although they have wanted to go in March 2025, they have not done so because they know that, due to their health conditions and the use of convoys, going to that place will only expose them to a hostile and discriminatory environment. Mr. Ramón, as the father and caregiver of V.R.R. and

F.R.R., is also aware of this. As a result, they feel discouraged from going to the location, as the experience could be uncomfortable and limiting for them.

54. Despite all this, V.R.R. and F.R.R., along with Mr. Ramón, plan to visit Caribe Wraps within the next three months to try their delicious wraps, protein options, plant-based items, and fresh vegetables, as well as the excellent breakfast they offer. They hope to enjoy these products without the obstacles that currently discourage them from visiting the establishment. V.R.R. and F.R.R. and Mr. Ramón are aware of the following barriers at Caribe Wraps:

- 54.1. Sidewalks in Front of the Establishment Too Narrow, Uneven, and with Cracks: V.R.R. and F.R.R. know, along with their father, Ramón Rivera, that the sidewalks in front of the establishment are too narrow and uneven, severely hindering their movement with their convoys. The cracks and potholes present on the surface create significant obstacles, forcing the children to maneuver with difficulty, affecting their ability to move independently. The health conditions of V.R.R. and F.R.R. worsen this situation, as their muscle weakness prevents them from overcoming these obstacles without the constant assistance of their father. Additionally, the sidewalks are obstructed by utility poles, large trash bins, and overgrown vegetation, further worsening the path and creating a dangerous environment. The obstruction of the sidewalks forces Ramón to seek alternate routes, increasing the time and effort needed to move from one place to another, limiting the freedom of movement for both the children and their caregiver.

- 54.1.1. V.R.R. and F.R.R., together with their father, Ramón Rivera, are aware that the sidewalks in front of Caribe Wraps are extremely narrow, making

it very difficult for them to move with their convoys. Due to their health conditions and muscle weakness, V.R.R. and F.R.R. face significant challenges maneuvering in such tight spaces. This not only limits their ability to move independently but also forces Ramón Rivera to provide constant assistance. The narrow sidewalks increase discomfort and difficulty in moving, exposing V.R.R. and F.R.R. to more physical strain and a more restricted experience when trying to access the location.

54.1.2. In addition to the narrowness, the sidewalks also have cracks and potholes, which present a significant obstacle for V.R.R. and F.R.R. as they make their way to the establishment. These irregularities in the pavement make it very hard for V.R.R. and F.R.R. to move without assistance, as every crack increases the risk of destabilizing the convoys, forcing them to rely constantly on their father to continue their journey. The cracks also intensify the physical effort V.R.R. and F.R.R. must exert, as their mobility is already limited by their health conditions. This impacts their autonomy and creates a dangerous environment for them, making their movement slower and more strenuous.

54.1.3. Furthermore, the sidewalks in front of Caribe Wraps are obstructed by various elements such as utility poles, large trash bins, and overgrown vegetation, making it impossible for V.R.R. and F.R.R. to pass freely with their convoys. These obstructions block the path and create a difficult and dangerous environment for V.R.R. and F.R.R., who already face significant challenges due to their health conditions. The poles and trash

bins on the sidewalks force Ramón Rivera to find alternate routes, increasing the time and effort needed to reach the establishment. The lack of a clear path limits V.R.R. and F.R.R.'s ability to move easily, greatly affecting their mobility and experience.

54.1.4. The Municipality of Arecibo and the Commonwealth of Puerto Rico are fully aware of the situation regarding the narrow, uneven, and obstructed sidewalks, as well as the accessibility barriers that affect V.R.R. and F.R.R. and other individuals with mobility impairments in the area. Despite this knowledge, both entities have taken no action to address the situation. The lack of action by the Municipality of Arecibo and the Commonwealth of Puerto Rico perpetuates discrimination against V.R.R. and F.R.R., who suffer the consequences of the lack of accessibility, limiting their freedom of movement and putting their safety at risk. This inaction not only affects the children and their father, Ramón Rivera, but also reflects a failure by the municipality and the central government to fulfill their responsibility in ensuring accessibility and equal rights for people with disabilities, further exacerbating their situation.

54.2. High Counter: V.R.R. and F.R.R., along with their father, Ramón Rivera, are aware that the customer service counter at Caribe Wraps is too high, making it difficult for them to access it with their convoys. Since V.R.R. and F.R.R. cannot get close enough to the counter, they are forced to rely on their father to interact with the staff or make transactions. This barrier limits V.R.R. and F.R.R.'s independence, as they are unable to perform these tasks on their own, increasing

the effort and time required to complete simple activities, such as placing an order or receiving assistance.

- 54.3. Counter Lacking Depth: V.R.R. and F.R.R., together with their father, Ramón Rivera, are conscious that the customer service counter at Caribe Wraps lacks the necessary depth for an adequate frontal approach, making it inaccessible for them when using their convoys. The lack of depth prevents V.R.R. and F.R.R. from getting close enough, making it difficult for them to interact with the staff or make purchases comfortably. This forces Ramón Rivera to assist V.R.R. and F.R.R. constantly, which increases the effort required to complete simple tasks and limits the comfort and efficiency of their interactions within the establishment. The lack of counter adaptation represents a significant barrier that prevents V.R.R. and F.R.R. from fully participating in the experience.
- 54.4. To address the accessibility barriers at Caribe Wraps and the sidewalks in front of the establishment, several urgent solutions must be implemented. The sidewalks should be widened, repaired, and leveled to ensure they are wide enough and smooth for V.R.R. and F.R.R. to move freely with their convoys. All cracks, potholes, and irregularities should be fixed to eliminate obstacles and prevent destabilization of the convoys. Additionally, the sidewalks should be cleared of obstructions such as utility poles, trash bins, and overgrown vegetation, ensuring a clear and safe path for the children. The customer service counter should be lowered to an appropriate height and adapted with sufficient depth to allow V.R.R. and F.R.R. to access it comfortably and independently. This adaptation will enable them to interact with the staff and complete transactions without the constant

assistance of their father. These changes would not only eliminate the physical barriers but also improve the overall experience, ensuring that V.R.R. and F.R.R. can participate fully and independently while ensuring their safety and comfort.

- 54.5. Additionally, the Municipality of Arecibo has failed to enforce accessibility regulations by allowing Caribe Wraps to operate with barriers at the establishment. Furthermore, the Municipality has neglected to repair the damaged and uneven sidewalks, further restricting access. By allowing these conditions to persist, the Municipality is creating a situation of discrimination and exclusion that directly affects V.R.R. and F.R.R. The poor condition of the sidewalks and the lack of accessible routes make it impossible for them to navigate safely, forcing them to find alternative paths that add unnecessary difficulty and physical strain. These combined obstacles prevent them from entering, moving through the establishment, and accessing its services, ultimately discouraging them from visiting the business.

**Responsibility of the Municipality of Arecibo and Supermercados Hatillo, Inc  
Hatillo Kash N' Karry**

55. Mr. Ramón Rivera, along with his children, V.R.R. and F.R.R., greatly enjoy their daily shopping for the home, such as going to the supermarket, as it serves as a form of distraction and relaxation for them. They love selecting their breakfasts, favorite meats, cereals, and school lunches. For them, these visits are not only an opportunity to stock up on products but also to enjoy a moment of family connection. They are especially excited to visit Hatillo Kash N' Karry, a supermarket that offers a wide variety of food and household products at competitive prices. Mr. Ramón is particularly interested in the discounts on fresh fruits and vegetables, which allow him to provide healthy options for

his family without compromising his budget. Additionally, he is aware of the excellent quality of the cleaning products sold there, which gives him peace of mind knowing that he is purchasing trustworthy products for the home. For him, the shopping experience is not just a necessity but an opportunity to enjoy small moments of normalcy and satisfaction while ensuring that his family has everything they need.

56. However, since December 2025, Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the architectural barriers at the supermarket, which affect their access and create insecurity about the possibility of fully enjoying their shopping experience. Despite their enthusiasm for the variety of products, the existing barriers discourage them from visiting the establishment. In January and February of 2025, Mr. Ramón and his children wanted to visit Hatillo Kash N' Karry due to its excellent prices and product variety. However, the architectural barriers remain a significant obstacle for their visit. Nonetheless, in the next three months, Mr. Ramón and his children will go to visit Hatillo Kash N' Karry to explore the wide range of products, enjoy the excellent customer service of the establishment, and purchase their favorite high-quality products at excellent prices. They are excited to select their products, but the architectural barriers, of which they are aware, continue to be a reason to postpone their visit. The barriers that Mr. Ramón and his children, V.R.R. and F.R.R., are aware of are the following:

- 56.1.1. Cracked Sidewalk: Mr. Ramón and his children V.R.R. and F.R.R. are aware that the sidewalk leading to Hatillo Kash N' Karry supermarket is cracked in several sections. This condition severely affects their ability to access the supermarket safely. Because V.R.R. and F.R.R. suffer from spinal muscular atrophy and depend on convoys for mobility, walking on



the cracked pavement causes them additional physical effort, which increases their risk of injury, such as falls or sprains. The cracks interrupt the smooth movement of their convoys, making it difficult to access the supermarket and causing pain and fatigue, further aggravating their health situation and limiting their mobility.

56.1.2. Sidewalk in Poor Condition and Lack of Signage: Mr. Ramón and his children V.R.R. and F.R.R. are aware that the sidewalk in front of the Hatillo Kash N' Karry supermarket is in poor condition overall. Its deterioration forces them to move over unsafe surfaces that cause discomfort and physical pain. For children like V.R.R. and F.R.R., whose condition progressively weakens their muscles, this type of sidewalk requires excessive effort to cross, leading to fatigue, muscle strain, and an increased vulnerability to injuries. The lack of maintenance on the sidewalk makes the journey to the supermarket an additional burden, which contributes to a decrease in their quality of life and makes it harder for them to perform an everyday activity like going shopping. Additionally, the absence of proper signage worsens the situation, as it makes it difficult to clearly identify the accessible path, creating more obstacles and increasing insecurity during the walk.

56.1.3. Uneven Surfaces and Slopes on the Sidewalk: Mr. Ramón and his children V.R.R. and F.R.R. are aware that the sidewalk in front of the supermarket also presents significant slopes and uneven surfaces, which pose serious challenges for people with disabilities. These abrupt changes in the

sidewalk level not only increase the physical burden of mobility but also endanger their stability while using the convoys. These uneven surfaces force V.R.R. and F.R.R. to make extreme efforts to maintain their balance, which increases the risk of falls or severe injuries. Furthermore, the children's father, Ramón Rivera, must provide constant assistance to prevent them from getting hurt, limiting their autonomy and their right to move independently and safely. The lack of a level surface also increases physical strain, making every movement a constant struggle.

56.1.4. **Illegal Parking Blocking Access:** Mr. Ramón and his children V.R.R. and F.R.R. are aware that vehicles are often parked illegally along the sidewalk and access points to the Hatillo Kash N' Karry supermarket, completely blocking their ability to enter the supermarket. This illegal parking obstructs their path and restricts their fundamental right to access public commercial spaces like anyone else. For children with spinal muscular atrophy, who rely on convoys and their father's help, this not only limits their freedom of movement but also exposes them to dangerous situations as they are forced to navigate around these vehicles in traffic. The obstruction of the sidewalk forces them to take unsafe routes, putting their safety and well-being at risk. This additional barrier turns what should be a simple activity, like going to the supermarket, into a much greater challenge, creating unnecessary physical and emotional strain.

56.1.5. It is the Municipality's responsibility to ensure that public infrastructure is safe and accessible. However, despite being fully aware of the existing

deficiencies, it has failed to take the necessary actions to address them, which reveals a lack of response to an issue that directly affects the mobility and safety of the public. This omission perpetuates a situation of discrimination, as it excludes V.R.R. and F.R.R., who are forced to face additional obstacles in their movement. Moreover, the Municipality's inaction reinforces their exclusion by denying them an adequate and safe urban environment, and it worsens inequality by not implementing measures to guarantee equitable access for them.

56.2. Product Stands in the Middle of the Aisles: At Hatillo Kash N' Karry, product stands located in the middle of the aisles significantly block the path of Mr. Ramón and his children, V.R.R. and F.R.R., who rely on mobility devices. The stands block the aisles, forcing them to navigate through narrow paths, which causes unnecessary physical effort, resulting in fatigue and pain. The children, in particular, struggle to navigate the aisles with their convoys, and Mr. Ramón is constantly forced to assist them, increasing his fatigue and stress. The design not only limits their ability to move independently but also creates a constant sense of exclusion and frustration. The discomfort caused by these barriers directly affects their shopping experience, making it less enjoyable and more physically and emotionally exhausting for the family.

56.3. Cash Registers Too Close Together: The cash registers at Hatillo Kash N' Karry are placed too close to each other, making it difficult for the children, V.R.R. and F.R.R., to move safely while Mr. Ramón completes his transaction. Due to the lack of space, the children must maneuver through narrow aisles, which causes

unnecessary physical effort. This extra effort increases their muscle pain and stiffness, resulting in discomfort and fatigue. The closeness of the registers forces Mr. Ramón to intervene to assist his children, but the real harm falls on the children, who face difficulties moving and are exposed to greater physical and emotional discomfort while trying to maneuver in the cramped space.

56.4. Stacked Cardboard Boxes with Products: The stacked cardboard boxes in Hatillo Kash N' Karry block the passage and reduce the visibility of products, creating a significant barrier for the children, V.R.R. and F.R.R. As they try to maneuver their convoys around the boxes, the children are forced to make strained movements, leading to muscle spasms and increased stiffness. These involuntary movements cause pain and increase discomfort. The lack of space to move freely also limits their ability to access the products, causing frustration. While Mr. Ramón experiences stress from having to assist his children, the primary impact is on the physical and emotional well-being of the children.

56.5. The barriers at Hatillo Kash N' Karry can be resolved through several actions. First, the sidewalks should be repaired to remove cracks, level the pavement, and ensure a smooth surface that allows for safe and fluid movement. The slopes and uneven surfaces on the sidewalk should be corrected to prevent the risk of falls and facilitate passage without additional effort. Vegetation blocking the ramps should be cleared regularly to maintain an accessible path. Additionally, illegal parking should be controlled to ensure that access to the entrance is not blocked, allowing people with mobility devices to enter without obstacles. Inside the supermarket, product stands located in the middle of the aisles should be relocated

to allow free and unrestricted passage. The cash registers should be rearranged to provide enough space between them, preventing customers from having to maneuver in a cramped space. These measures would ensure safer, more comfortable, and inclusive access for customers with reduced mobility, eliminating the barriers that currently hinder their experience at the establishment.

- 56.6. Furthermore, the Municipality of Arecibo has neglected its duty to enforce accessibility regulations, allowing Hatillo Kash N' Karry to operate with significant barriers that restrict entry and movement within the establishment. By granting permits without ensuring compliance with accessibility requirements, the Municipality has directly contributed to the exclusion of Mr. Ramón and his children, V.R.R. and F.R.R. The lack of accessible routes makes it extremely difficult for them to enter and navigate the establishment safely. Since both children rely on a convoy for mobility, these obstacles create unnecessary challenges, limiting their ability to move freely and access the services provided. This continued failure to meet accessibility standards fosters a discriminatory and exclusionary environment.

**Responsibility of the Commonwealth Of Puerto, Municipality of Arecibo and King China Restaurant L.L.C. - King China Restaurant**

57. Mr. Ramón Rivera, along with his children, V.R.R. and F.R.R., has a strong interest in visiting King China Restaurant LLC to experience its highly praised food and welcoming atmosphere. They are eager to explore the diverse menu options, which include homemade eggrolls and a variety of flavorful dishes. The family is particularly excited to try the mofongo with garlic shrimp, known for its delicious taste, as well as other offerings that showcase the restaurant's rich culinary selection. Additionally, they

appreciate that the restaurant maintains high standards of cleanliness and provides excellent service, creating a comfortable dining environment. Since the restaurant stays open late, they see it as a convenient option for enjoying a relaxed meal together. As of November 2024, Mr. Ramón and his children, V.R.R. and F.R.R know that the restaurant has architectural barriers that, due V.R.R. and F.R.R health conditions, affect their accessibility, which discourages them from visiting. In December 2024, as well as in January and February 2025, they wanted to dine at the restaurant because of its reputation for serving high-quality food. However, the architectural barriers at King China Restaurant LLC, which they know exist, discourage them from going.

58. In the next three months, Mr. Ramón and his children, V.R.R. and F.R.R want to visit King China Restaurant LLC to explore its diverse menu, enjoy its inviting and family-friendly ambiance, and experience the excellent customer service that others have praised. They look forward to sharing a special dining experience and discovering new dishes. However, the architectural barriers at King China Restaurant LLC, which they know exist, discourage them from going. The barriers Mr. Ramón and his children, V.R.R. and F.R.R are aware of are the following:

- 58.1. Barriers on the Sidewalk in Front of King China Restaurant LLC: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware of barriers on the sidewalk in front of King China Restaurant LLC located at Hwy. 129 KM 40.8, Víctor Rojas 1, Arecibo, PR 00612-0000, with coordinates 18.459543134464127, -66.73962873134431. The sidewalk has cracks and uneven pavement, making mobility challenging. Additionally, the sidewalk ramp located in front at the corner of King China Restaurant LLC with coordinates 18.459714299220998,

-66.73974468600986 is in poor condition with uneven pavement and cracks, and the sidewalk ramps at the other corner of King China Restaurant LLC with coordinates 18.459739741219423, -66.73961325777144 is also damaged with uneven pavement and cracks, additionally obstructed by overgrown vegetation, further limiting accessibility.

58.1.1. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware that the sidewalks in front of King China Restaurant LLC have cracks and uneven pavement. As V.R.R. and F.R.R. move with the convoy, the irregular surface causes the wheels to jolt suddenly, making it difficult for them to maintain a straight and stable path. V.R.R. and F.R.R. experience discomfort due to the constant vibrations and abrupt movements, which force Mr. Rivera to exert more effort to control the convoy and prevent it from veering to the sides. Because of this, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting King China Restaurant LLC.

58.1.2. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have noticed that the sidewalk ramp with coordinates 18.459714299220998, -66.73974468600986 is in poor condition, with cracks and an uneven surface. As they move with the convoy, the wheels get caught in the cracks, causing sudden stops that disrupt their movement and require extra force to push forward. The uneven slope makes it difficult for Mr. Rivera to maneuver the convoy smoothly, increasing strain on his arms and making the transition onto the ramp uncomfortable for V.R.R. and F.R.R.

Due to these difficulties, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from going to King China Restaurant LLC.

58.1.3. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware that the ramp with coordinates 18.459739741219423, -66.73961325777144 is damaged and covered with overgrown vegetation. As V.R.R. and F.R.R. use convoy, the plants get caught in the wheels, creating friction that slows their movement and forces Mr. Rivera to stop repeatedly to remove obstructions. The convoy does not roll smoothly over the uneven surface, causing discomfort for V.R.R. and F.R.R. as they experience frequent jerks and resistance. Because of this, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting King China Restaurant LLC.

58.1.4. The Commonwealth of Puerto Rico is responsible for ensuring that public infrastructure is maintained in a safe and accessible condition. However, the sidewalks and ramps under its jurisdiction remain in a state of disrepair, with cracks, uneven pavement, and overgrown vegetation obstructing access. Despite its obligation to maintain these essential pathways, the government has failed to take corrective action, leaving individuals like Mr. Ramón Rivera and his children, V.R.R. and F.R.R., to face unnecessary barriers in their daily mobility. This negligence not only creates unsafe conditions but also reinforces their exclusion by preventing them from navigating these areas independently and without undue hardship.



- 58.2. Parking Lot with Damaged Pavement: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., experience difficulty navigating the parking lot due to its damaged pavement. The V.R.R. and F.R.R. convoy's wheels struggle to roll over the deep cracks and uneven patches, making movement inconsistent and requiring Mr. Rivera to apply extra force to keep control. The rough surface increases vibrations, causing discomfort for V.R.R. and F.R.R. as they feel continuous shaking while crossing the lot. Because of these challenges, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting King China Restaurant LLC.
- 58.3. Lack of Accessible Parking Spaces: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., face significant obstacles when attempting to visit King China Restaurant LLC due to the complete absence of properly designed accessible parking spaces. They are aware that none of the existing parking spaces meet the required dimensions to accommodate their needs, lacking both the necessary width for safe vehicle exit and entry, and the adjacent access aisles essential for deploying mobility equipment. Furthermore, there is no proper signage identifying designated accessible parking, making it impossible for Mr. Rivera to locate appropriate parking when arriving with his children. This fundamental accessibility failure forces the family to navigate unsafe conditions, risking their physical wellbeing and dignity when attempting to access the restaurant. As a result, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel effectively excluded from patronizing the establishment.

- 58.4. Access Route from the Parking Lot to the Entrance in Poor Condition: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., notice that the route from the parking lot to the entrance is in poor condition with cracks and uneven pavement, making it difficult for them to reach the building smoothly. As V.R.R. and F.R.R. move with the convoy, the uneven pavement forces them to navigate carefully, increasing the physical strain on Mr. Rivera and slowing their progress. The unstable ground causes the convoy to tilt unexpectedly, making it uncomfortable for V.R.R. and F.R.R. to maintain a steady position while moving forward. Due to this, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from going to King China Restaurant LLC.
- 58.5. Black Mat at the Entrance: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware that a black mat is placed at the entrance, making it difficult for V.R.R. and F.R.R. to enter smoothly. The edges of the mat create resistance against the V.R.R. and F.R.R. convoy's wheels, requiring Mr. Rivera to push harder to cross over it. The material of the mat also causes the wheels to drag, making movement less fluid and increasing discomfort for V.R.R. and F.R.R., who feel the sudden halts and extra force needed to proceed. Because of this, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the restaurant.
- 58.6. Customer Service Counter Covered in Gray Ceramic with a White Surface and Set Too High: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., notice that the customer service counter is too high, making it difficult for them to interact with staff. While seated in the convoy, V.R.R. and F.R.R. are unable to see the

surface of the counter and place items on it without assistance. V.R.R. and F.R.R. stretch and lift objects above his shoulder level, which is uncomfortable and impractical for completing transactions. Because of this limitation, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from going to King China Restaurant LLC.

58.7. Customer Service Counter Covered in Gray Ceramic with a White Surface and Too Shallow: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., have difficulty using the customer service counter because it is too shallow. When V.R.R. and F.R.R. approach in the convoy, there is not enough space to position their items securely, forcing them to balance objects on their laps and hold them uncomfortably. This makes it challenging to handle payments and receive food without struggling to keep everything steady. Because of these difficulties, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the place.

58.8. Table Arrangement That Obstructs Access: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., notice that the arrangement of tables makes it difficult for V.R.R. and F.R.R. to move inside the restaurant. As V.R.R. and F.R.R. navigate with the convoy, V.R.R. and F.R.R. encounter narrow spaces that force them to make tight turns and stop abruptly when there is no clear path forward. Mr. Rivera frequently repositions the convoy to avoid hitting tables, making movement stressful and uncomfortable for V.R.R. and F.R.R., who experience constant stops and readjustments. Because of this, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting King China Restaurant LLC.

- 58.9. The barriers at King China Restaurant LLC could be eliminated by repairing the sidewalks to remove cracks and level the pavement, ensuring a smooth surface that allows uninterrupted movement. The sidewalk ramp must be resurfaced to eliminate irregularities and cracks, preventing the convoy from getting stuck. The vegetation obstructing the ramp should be cleared regularly to maintain a clear path. The parking lot pavement should be repaved to eliminate uneven sections that cause discomfort and difficulty in movement. Additionally, at least one accessible parking space must be designated with the proper dimensions and clear signage in accordance with accessibility standards, including adequate width for vehicle exit and entry and an adjacent access aisle to safely accommodate mobility equipment. The access route from the parking lot to the entrance must be repaired to provide a stable and continuous pathway. The black mat at the entrance should be replaced with a low-profile, slip-resistant mat that does not interfere with the convoy's movement. The customer service counter should be lowered to a height that allows visibility and direct interaction, and its depth should be extended to provide enough space for placing items comfortably. The table arrangement inside the restaurant must be adjusted to create wide, unobstructed pathways, allowing easy navigation without constant repositioning.
- 58.10. Furthermore, the Municipality of Arecibo has neglected its duty to enforce accessibility regulations, allowing King China Restaurant LLC to operate with significant barriers that restrict entry and movement within the establishment. By granting permits without ensuring compliance with accessibility requirements, the Municipality has directly contributed to the exclusion of Mr. Ramón and his

children, V.R.R. and F.R.R. The lack of accessible routes makes it extremely difficult for them to enter and navigate the restaurant safely. As both children rely on a convoy for mobility, these obstacles create unnecessary challenges, limiting their ability to move freely and access the services provided. This continued failure to uphold accessibility standards fosters a discriminatory and exclusionary environment

**Responsibility of the Commonwealth Of Puerto, Municipality of Arecibo and Johannas Pizza Y Algo Mas Corp. - Johannas Pizza Y Algo Mas Corp**

59. Mr. Ramón Rivera, along with his children, V.R.R. and F.R.R., intends to visit Johannas Pizza Y Algo Mas Corp because they are eager to experience the restaurant's inviting atmosphere, which is known for being family-friendly and enjoyable. They are excited about trying its highly praised pizza, which has a perfectly toasted thin crust and stretchy, flavorful cheese. As of October 2024, they have known that the restaurant has architectural barriers that, due V.R.R. and F.R.R. health conditions affect their accessibility, which discourages them from visiting. In February and March 2025, they have wanted to dine at the restaurant because of its reputation, its high-quality pizza and variety of desserts, the excellent service provided by the friendly staff, and the enjoyable ambiance. However, since they became aware of the architectural barriers at the establishment, which affect the accessibility of V.R.R. and F.R.R., they have felt discouraged from visiting the restaurant.
60. In the next four months, they want to visit Johannas Pizza Y Algo Mas Corp to discover new flavors, enjoy a casual and relaxed dining experience, and spend quality time together in a place known for its great food and affordability. Additionally, they are particularly interested in trying the Half Pepperoni and Half Ground Beef Pizza, as they

enjoy these flavors and look forward to experiencing the restaurant's unique preparation. However, the architectural barriers at Johannas Pizza Y Algo Mas Corp, discourage them from going. The barriers Mr. Ramón Rivera and his children, V.R.R. and F.R.R. are aware of are the following:

60.1. Barriers on the Sidewalk in Front of Johannas Pizza Y Algo Más Corp: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware of barriers on the sidewalk in front of Johannas Pizza Y Algo Más Corp located at Hwy. 2 KM 63.6, Candelaria Sector, Sabana Hoyos Neighborhood, Arecibo, PR 00612-0000, with coordinates 18.43538961172964, -66.62211108605362. The sidewalk has irregular pavement, cracks, and overgrown vegetation, making it difficult to navigate. Additionally, parked vehicles obstruct the sidewalk, further limiting accessibility.

60.1.1. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., are aware that the sidewalk in front of Johannas Pizza Y Algo Más Corp has an uneven surface, cracks, and overgrown vegetation. These conditions make it difficult for V.R.R. and F.R.R. to move with the convoy, as the irregular pavement causes sudden jolts, making navigation uncomfortable and unstable. The cracks create obstacles that the V.R.R. and F.R.R. convoy's wheels struggle to cross smoothly, requiring additional effort to maneuver. The vegetation further narrows the available space, forcing them to adjust their path constantly. For these reasons, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the establishment.

- 60.1.2. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., notice that vehicles are parked in a way that obstructs the sidewalk. This forces them to leave the sidewalk and move onto the street, exposing V.R.R. and F.R.R. to unnecessary risks and making their route more complicated. The convoy requires a stable and continuous path, but the parked cars block their way, requiring V.R.R. and F.R.R. to navigate through uneven surfaces and find an alternative route. As a result, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the restaurant.
- 60.1.3. The Commonwealth of Puerto Rico has the duty to maintain public sidewalks in a safe and accessible condition. However, the sidewalk in front of Johannas Pizza Y Algo Más Corp remain in a deteriorated state, with uneven pavement, cracks, and excessive vegetation growth, making mobility difficult for Mr. Ramón Rivera and his children, V.R.R. and F.R.R. Additionally, vehicles park blocks the sidewalk, further limiting their ability to navigate the area. Despite being responsible for addressing these conditions, the government has failed to take corrective action, allowing these barriers to persist. This negligence not only creates unsafe conditions but also imposes unnecessary difficulties that restrict their access to the establishment.
- 60.2. Worn and Uneven Parking Pavement: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., experience difficulties with the parking lot pavement, which is worn and full of irregularities. The uneven surface makes it harder for V.R.R. and F.R.R. to move, as the convoy's wheels frequently get stuck and require extra

force to advance. This causes discomfort and makes their journey from the vehicle to the entrance more complicated than necessary. Due to these difficulties, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the establishment.

60.3. Lack of Designated Accessible Parking Spaces with Proper Signage: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., notice that the parking area lacks designated accessible spaces with vertical signage displaying the universal disability symbol. Without these designated spaces, they struggle to find a spot where they can safely park and deploy the V.R.R. and F.R.R.'s convoy. The absence of proper signage also increases that other drivers unknowingly occupy spaces that facilitate their access. Because of these challenges, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the establishment.

60.4. Lack of an Access Route from the Parking Lot to the Entrance: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., recognize that there is no designated route from the parking lot to the entrance. This forces V.R.R. and F.R.R. to navigate through an undefined path, where V.R.R. and F.R.R. encounter unstable pavement, obstacles, and potential disruptions in movement. Without a clear and accessible path, V.R.R. and F.R.R. have to take additional steps to find a suitable way to reach the entrance. This added inconvenience makes their visit unnecessarily complicated, leading Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from going to the restaurant.



- 60.5. Order Counter Too High: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., realize that the brown order counter is too high, making direct interaction with staff difficult. Due to V.R.R. and F.R.R. position in the convoy, they cannot comfortably see over the counter, which prevents them from having a clear view of the menu and communicating easily with employees. This forces V.R.R. and F.R.R. to rely on others to place an order, taking away their ability to interact independently. As a result, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the place.
- 60.6. Order Counter Lacks Depth: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., notice that the brown order counter is lacks sufficient depth, making it difficult for V.R.R. and F.R.R. to place items securely. When receiving food and handling transactions, they struggle to position items comfortably on the counter, as there is not enough surface area to accommodate their needs. This makes ordering and paying unnecessarily complicated. Due to this inconvenience, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the establishment.
- 60.7. Table Arrangement Restricts Movement: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., observe that the table arrangement inside the restaurant makes circulation difficult. The narrow gaps between tables limit V.R.R. and F.R.R. ability to move freely with the convoy, requiring constant adjustments and careful maneuvering. The restricted space increases the likelihood of unintentional contact with tables and chairs, making navigation stressful and inconvenient.

Because of this issue, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from visiting the establishment.

- 60.8. Tables with Lower Support Bars: Mr. Ramón Rivera and his children, V.R.R. and F.R.R., recognize that the tables in the restaurant have lower support bars that interfere with their ability to position the convoy comfortably. These bars limit how close V.R.R. and F.R.R. can get to the table, forcing them to stretch uncomfortably to reach their food. This creates an awkward and inconvenient dining experience that affects V.R.R. and F.R.R. comfort. Due to this difficulty, Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel discouraged from going to the restaurant.
- 60.9. The barriers at Johannas Pizza Y Algo Mas Corp could be eliminated by repairing and leveling the sidewalk to remove cracks and irregular pavement, as well as clearing the overgrown vegetation to ensure a smooth and unobstructed path. Vehicles obstructing the sidewalk could be prevented by installing clear signage that discourages improper parking. The worn and uneven parking pavement should be resurfaced to create a stable surface that facilitates movement. Designated accessible parking spaces with proper vertical signage displaying the universal disability symbol should be installed to ensure clear identification. A defined and accessible route from the parking lot to the entrance must be established by paving a smooth, direct pathway. The brown order counter should be lowered to a reachable height to allow direct interaction, and its depth should be extended to provide adequate space for placing items securely. Inside the restaurant, tables should be rearranged to create wider pathways that facilitate

movement. Additionally, replacing tables with lower support bars with alternatives that provide sufficient clearance would allow comfortable positioning.

60.10. Moreover, the Municipality of Arecibo has failed to enforce accessibility regulations, allowing Johannas Pizza Y Algo Más Corp to operate with barriers that hinder entry and movement within the establishment. By issuing permits without ensuring compliance with accessibility standards, the Municipality has directly contributed to the exclusion of Mr. Ramón and his children, V.R.R. and F.R.R. The absence of accessible routes makes it extremely difficult for them to enter and navigate the restaurant safely. As both children rely on a convoy for mobility, these obstacles create unnecessary challenges, restricting their ability to move freely and access the services offered. This ongoing failure to uphold accessibility standards results in a discriminatory and exclusionary place.

**Responsibility of the Municipality of Arecibo and George's BBQ LLC**  
**George's BBQ**

61. Mr. Ramón and his children, V.R.R. and F.R.R., have always loved enjoying gastronomy, especially BBQ-style food. The combination of smoky flavors and grilled meats is one of their passions, and they enjoy discovering new places where they can indulge in these dishes. That's why they want to visit George's BBQ, especially to taste grilled chicken and ribs. They are excited for the opportunity to try these delicious preparations, which certainly match their taste for good food and the authentic flavor of BBQ. However, Mr. Ramón and his children, V.R.R. and F.R.R., have been aware of the architectural barriers at the location since December 2024. Despite wanting to visit George's BBQ in January and February of 2025, they feel dissuaded by these barriers. Although they love the

restaurant's food offerings, they know that the physical barriers make the visit difficult and discourage them from going.

62. Mr. Ramón and his children, V.R.R. and F.R.R. have the intention to visit George's BBQ in the next two months to try the BBQ ribs, but they are currently dissuaded from doing so due to the persistent presence of accessibility barriers. Although their desire to enjoy the delicious food remains strong, the difficulties they face due to the physical obstacles at the location prevent them from planning the visit with confidence and comfort. The barriers that Mr. Ramón and his children, V.R.R. and F.R.R. identified at George's BBQ are:

- 62.1. Inaccessible Sidewalks: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located in front of George's BBQ, situated at Av. San Luis #960 Km 1.7, Highway 129, Bo. Hato Abajo, Arecibo, PR 00612-0000, with coordinates 18.46113911575524, -66.73914695141852, is deteriorated, with cracks and uneven surfaces that make safe passage difficult, increasing the risk of falls and trips, especially for V.R.R. and F.R.R., who rely on their convoys as mobility devices. The irregularities not only cause discomfort but also require additional effort to walk, affecting the children's independence and safety. Moreover, the sidewalk is partially blocked by illegally parked vehicles that protrude from the parking lot, narrowing the available space and forcing the children to maneuver in a reduced and potentially dangerous area, further heightening the risk of falls. For Mr. Ramón, this barrier represents a constant challenge, as he must stay alert at all times to prevent his children from suffering accidents, which increases both his physical and emotional exhaustion, and he

faces additional burdens when assisting them around the improperly parked cars, adding more tension.

62.1.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk is deteriorated, with cracks and uneven surfaces, making safe passage difficult. These cracks increase the risk of falls and trips, especially for V.R.R. and F.R.R., who rely on their convoys as mobility devices. The irregularities in the ground not only cause discomfort but also require additional effort to walk, affecting the children's independence and safety. For Mr. Ramón, this barrier represents a constant challenge, as he must stay alert at all times to prevent his children from suffering accidents, which increases his physical and emotional exhaustion.

62.1.2. Additionally, Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk is partially blocked due to the illegal parking of vehicles. These cars protrude from the parking lot and obstruct the path, narrowing the available space for movement. This obstruction forces the children to maneuver in a reduced and potentially dangerous space, increasing the risk of falls and complicating their movement in the convoys. For Mr. Ramón, this physical barrier represents an additional burden, as he must constantly assist his children in navigating around the improperly parked vehicles, creating more tension and physical and emotional exhaustion.

62.1.3. It is the Municipality's responsibility to ensure that public infrastructure is safe and accessible to everyone. However, despite being fully aware of the ongoing issues, it has failed to take the necessary actions to resolve them,

demonstrating a lack of response to a matter that directly affects public safety and mobility. This negligence continues to create an environment of exclusion for V.R.R. and F.R.R., who face additional difficulties in moving freely. Moreover, the Municipality's failure to intervene further deepens this exclusion by not providing a secure and appropriate urban space, exacerbating inequality by not implementing the essential measures to guarantee equal access for all.

62.2. Parking Lot Without Accessible Space Signage: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the parking lot lacks proper signage to identify an accessible space for people with reduced mobility. This lack of clear marking causes confusion and makes it difficult to find a suitable place to park, forcing Mr. Ramón to spend more time and effort looking for an appropriate space. This barrier primarily affects the children, who rely on their mobility devices to move, as the process of finding a suitable parking spot and preparing the convoys for use becomes slower and more complicated. This increases the discomfort and physical effort required from the children, who already face difficulties due to their condition, further limiting their autonomy and safety. The absence of a clearly defined accessible space worsens their situation, as they must fully depend on their caregiver to get out of the vehicle and move forward, causing frustration and a greater sense of exclusion.

62.3. No Defined Accessible Route from the Parking Lot to the Main Door: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that there is no clearly defined accessible route between the parking lot and the main door. The lack of an

adequate path significantly worsens the children's mobility, as they must navigate through an area not designed for people with mobility devices. The absence of an adapted route means that V.R.R. and F.R.R. constantly face the risk of falls or accidents, as the ground's irregularities and the lack of a clear path make it difficult for them to move forward. The children, who rely on their convoys, must exert extra physical effort to overcome the obstacles they encounter, causing discomfort and fatigue. Additionally, Mr. Ramón, as the primary caregiver, must remain constantly vigilant to prevent accidents, increasing his physical and emotional exhaustion, but also further restricting the children's ability to move independently, directly affecting their safety and well-being.

- 62.4. Ramp Connecting the Parking Lot to the Main Entrance Has Incorrect Inclination: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the ramp connecting the parking lot to the main entrance has incorrect inclination. The slope is too low, making it difficult for the children's convoys to efficiently overcome the height difference at the main doors. This barrier creates an additional obstacle for V.R.R. and F.R.R., who must exert much more physical effort to move up the ramp, which can cause them discomfort or even pain due to the difficulties they face in trying to move their mobility devices at such an inadequate angle. The incorrect inclination prevents them from moving with the autonomy they need, and they fully depend on their father for help, which reduces their independence. This constant need for assistance worsens Mr. Ramón's physical and emotional fatigue, but above all, it directly affects the children by

limiting their freedom of movement and increasing their frustration and discomfort.

62.5. Entrance Blocked by a Rug: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the entrance to the establishment is blocked by a rug that makes passage difficult. This rug poses a serious risk to the children, who suffer from muscular and spinal atrophy, which causes reduced mobility and a greater likelihood of falls. Due to this condition, the children have difficulty maintaining balance and navigating obstacles without help, so the rug significantly increases the risk of tripping. Mr. Ramón must be especially alert and assist them with more effort to prevent accidents, which increases his physical and emotional exhaustion. The presence of this rug not only compromises the children's safety but also reduces their independence, as they rely entirely on their father's help to overcome this obstacle, leading to frustration and increasing their sense of exclusion and vulnerability. The barrier posed by the rug becomes a constant concern, not only due to the risk of falls but also because of the additional discomfort it causes in their daily lives, affecting their overall well-being.

62.6. Reduced Circulation Space: Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the circulation space within the establishment is reduced due to the proximity of the tables and chairs, which makes it difficult to pass through. The lack of space between the furniture creates an inaccessible environment, especially for the children, who must maneuver carefully to avoid bumps or falls. This restricted space not only increases the risk of accidents but also limits the children's ability to move comfortably and safely. V.R.R. and F.R.R. have to exert



extra effort to navigate the obstacles, which increases their discomfort and makes their movement more difficult. Additionally, Mr. Ramón must constantly help the children overcome these barriers, which increases his physical and emotional exhaustion and further reduces the children's independence, affecting their safety and generating a sense of exclusion and lack of adequate access to the space.

- 62.7. To improve the barriers at the location for Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to take immediate and effective measures to eliminate the physical barriers that hinder their mobility and safety. First, it is crucial that the sidewalk be repaired to fix damages such as cracks and uneven surfaces. This intervention would not only reduce the risk of falls and trips for the children but also make their movement safer and more independent, reducing the extra physical effort they currently need to exert. Likewise, it is vital to install proper signage in the parking lot to identify an accessible space, ensuring that Mr. Ramón does not have to spend more time or effort looking for a suitable parking spot. A clearly marked and accessible parking space would improve the children's autonomy and allow for quicker and safer access to the establishment. Additionally, a clearly defined accessible route must be established from the parking lot to the main door. This route must be free of obstacles and suitable for people with reduced mobility, significantly reducing the risk of accidents for the children and increasing their ability to move independently. Creating a clear and adapted path would also relieve the burden on Mr. Ramón, who currently has to remain constantly alert to prevent his children from falling, which causes unnecessary physical and emotional exhaustion. Furthermore, the ramp

connecting the parking lot to the main entrance must be corrected to have the proper inclination, ensuring that the children's mobility devices can efficiently overcome the height difference. A ramp with the correct slope would allow the children to move without excessive effort, reducing the pain and discomfort they experience when trying to maneuver on an inadequate slope. It is also necessary to remove the rug that blocks the entrance to the establishment. This item poses a significant risk to the children, who face greater difficulties maintaining balance due to their condition. Removing this obstacle would considerably reduce the risk of falls and provide a safer environment for the children. The entrance should be completely accessible, allowing the children to move more easily and independently. Finally, the circulation space inside the establishment should be expanded. The tables and chairs should be rearranged to ensure enough space for the children to move without difficulty, preventing accidents and giving them the freedom to move safely. Increasing the circulation space would also reduce the physical and emotional burden on Mr. Ramón, who currently has to constantly assist his children in navigating between the furniture, which reduces their independence and increases their sense of exclusion.

**E. Responsibility of the Municipality of Arecibo.**

63. Mr. Ramón and his children, V.R.R. and F.R.R., deeply enjoy spending time together as a family exploring the different corners of the Municipality of Arecibo. For them, walking together is not just a recreational activity—it is a meaningful experience that strengthens their emotional bond and allows them to create valuable memories. These outings represent joyful moments where they can talk, explore, learn, and enjoy their

surroundings. For Mr. Ramón, as the primary caregiver, these activities are especially meaningful, as they allow him to see his children happy, curious, and connected to their community. These moments represent much more than just physical activity—they provide a sense of freedom and joy that they greatly appreciate, giving Mr. Ramón peace of mind knowing that his children are experiencing life in a way that fosters emotional and social growth.

64. These walks also help Mr. Ramón and his children break away from the daily home routine, offering them fresh air and the opportunity to be physically active. The family enjoys exploring different areas of Arecibo, discovering new spots, and immersing themselves in the culture and surroundings of the municipality. The sense of freedom that comes from walking through the streets of Arecibo allows them to feel connected to their city and its history. It gives them the opportunity to appreciate the town's architecture, historical monuments, and cultural landmarks, and helps them develop a stronger sense of identity and belonging. These walks not only serve as a bonding experience but also allow them to appreciate the little details of life in Arecibo, like local stores, the streets, and the people who make up the community.
65. Moreover, these walks provide a unique opportunity for quality family time, allowing Mr. Ramón and his children to strengthen trust, deepen communication, and reinforce the emotional connection between them. These moments are an essential part of their well-being, not just physically but emotionally and socially as well. For Mr. Ramón and his children, the ability to move freely through their city is integral to their happiness and well-being. Being able to explore their community without encountering physical barriers

allows them to experience life to the fullest, enjoy simple pleasures, and stay connected to the world around them.

66. However, despite the importance of these outings, the following sidewalks, which are the responsibility of the Municipality of Arecibo, present significant barriers and challenges. These obstacles severely limit the family's ability to enjoy these moments on equal terms with others. The sidewalks, which should serve as safe and accessible routes for pedestrians, are in a state of disrepair and are not properly maintained. The presence of cracked pavement, broken ramps, and obstacles blocking the path makes it difficult, and at times impossible, for Mr. Ramón and his children to navigate safely. For V.R.R. and F.R.R., who rely on mobility aids, these barriers pose a substantial risk to their safety, hindering their ability to fully engage with their environment and enjoy the simple pleasure of walking through their neighborhood.
67. These conditions not only prevent Mr. Ramón and his children from enjoying the outings they cherish, but they also diminish their sense of independence and security. The obstacles they face in trying to navigate their own community create unnecessary stress, frustration, and physical strain, undermining the quality of life they would otherwise experience. The Municipality of Arecibo's failure to address these issues has directly impacted their ability to participate fully in community life, restricting their movement and preventing them from enjoying the same freedoms that others in the community take for granted.
68. These sidewalks, which are the responsibility of the Municipality of Arecibo, present the following barriers that severely limit the ability of Mr. Ramón and his children, V.R.R. and F.R.R., to enjoy these moments safely and equally:

69. Mr. Ramón and his children, V.R.R. and F.R.R., frequent Street María de Hostos, Arecibo, PR 00612-0000, as there are several plazas nearby composed of natural areas and peaceful environments, such as the Plaza de Recreo, which allow them to enjoy relaxing walks. The location provides an ideal space for the family to spend time outdoors, enjoying the tranquility and beauty of the natural surroundings, which positively contributes to their well-being. The frequency with which Mr. Ramón and his children, V.R.R. and F.R.R., have visited the street has been especially during the months leading up to March 2025, including the months of December and November 2024, with March 4, 2025, being the last time they passed through the area. However, Mr. Ramón and his children are aware of the architectural barriers present in the area, which affect both the children due to their health conditions and the father as their caregiver. The barriers hinder the mobility of V.R.R. and F.R.R., who require constant assistance to move, increasing their discomfort and physical effort. Additionally, Mr. Ramón, as the one responsible for his children's well-being, is affected by these barriers, as he has to make an additional effort to help them navigate the obstacles, increasing his physical and emotional burden. This situation makes them feel dissuaded from returning to travel this street.
70. Mr. Ramón and his children, V.R.R. and F.R.R., has the intention to return to travel along María de Hostos Street, Arecibo, PR 00612-0000, within the next two months, as they want to enjoy the peaceful and family-friendly spaces located in the area once again. However, they are discouraged from returning due to the architectural barriers present, which affect the mobility of V.R.R. and F.R.R., as well as increasing the physical and emotional effort required from Mr. Ramón as their caregiver. The following obstacles,

which Mr. Ramón and his children, V.R.R. and F.R.R. directly encountered and interacted with, caused significant discomfort during their visit and further reinforced their decision to avoid returning until these issues are addressed. Mr. Ramón and his children, V.R.R. and F.R.R., personally identified the following barriers at María de Hostos Street, Arecibo, PR 00612-0000:

- 70.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk at Street María de Hostos, Arecibo, PR 00612-0000, from coordinates 18.470734952129916, -66.71510059928289 to coordinates 18.470497496435033, -66.71504180443151 is in an advanced state of deterioration, with an uneven, worn-out surface filled with potholes and cracks. These conditions make mobility more difficult and risky. Additionally, obstacles such as a hydraulic valve and trees block the path, forcing them to make additional maneuvers to continue their journey. In some sections, overgrown vegetation and other elements have almost completely interrupted the sidewalk, leaving areas practically nonexistent and further increasing mobility challenges. For V.R.R. and F.R.R., who rely on their mobility device to move safely, these barriers pose a constant challenge. The uneven terrain not only makes it harder to move forward but also increases physical fatigue and the effort required to navigate, affecting their stability and comfort. Each interruption in the sidewalk becomes an obstacle that demands more energy and concentration, causing discomfort and exposing them to potential risks. Mr. Ramón, as their primary caregiver, also faces significant strain. The physical effort required to assist his children in overcoming these barriers accumulates day after day, contributing to his exhaustion. Additionally,

the constant concern for V.R.R. and F.R.R.'s safety, combined with the difficulties of moving through an inaccessible environment, directly impacts his emotional and mental well-being. The lack of proper conditions not only complicates their daily journeys but also affects his and his children's overall quality of life.

70.2. On the same street, specifically located at Street María de Hostos, Arecibo, PR 00612-0000, from coordinates 18.47127727765751, -66.71523585847899 to coordinates 18.471000647470625, -66.7151773145332, Mr. Ramón and his children, V.R.R. and F.R.R., are aware that is extremely narrow and in a severe state of deterioration. Cracks, potholes, and depressions have damaged the surface to the point where some sections are nearly impassable. Additionally, overgrown vegetation has begun to sprout through the cracks, further reducing the available space and making it even more challenging to navigate safely. For V.R.R. and F.R.R., who rely on their mobility device, these conditions present a constant obstacle. The lack of sufficient space restricts their movements, forcing them to maneuver with extreme caution to avoid getting stuck in the most deteriorated sections. The cracks and uneven terrain create instability, requiring additional physical effort to move forward and increasing the risk of jolts and loss of balance. Every stretch of sidewalk becomes a challenge that demands extra energy and focus. Mr. Ramón, as their primary caregiver, also struggles with the impact of these barriers. Assisting his children in an environment with such limited space and numerous irregularities requires continuous physical effort, which becomes exhausting over time. Additionally, the daily concern for their safety and the stress of navigating such an inaccessible space take a toll on his

emotional and mental well-being. The lack of proper mobility conditions not only complicates their daily routes but also negatively affects his and V.R.R. and F.R.R.'s quality of life.

- 70.3. Additionally, the access ramp located at Street María de Hostos, Arecibo, PR 00612-0000, at coordinates 18.471005724134237, -66.7151839320263, is not positioned at a corner, which significantly reduces its functionality and safety. For a ramp to be truly accessible, it must be strategically placed at corners, allowing for a smooth and safe transition between the sidewalk and the roadway without requiring unnecessary detours or exposing pedestrians to risks. Due to this improper placement, Mr. Ramón and his children face additional difficulties in accessing the sidewalk or crossing the street safely. The need to deviate from a natural and safe path increases the physical effort and travel time, while also exposing them to avoidable hazards. This situation creates a barrier that affects both their mobility and their emotional and physical well-being, making each trip a challenging, frustrating, and exhausting experience.
- 70.4. Mr. Ramón and his children, V.R.R. and F.R.R., have identified several architectural barriers on María de Hostos Street, Arecibo, PR 00612-0000, that significantly hinder their mobility and safety. These barriers need to be addressed to ensure safe and comfortable access for them and others with similar needs. The sidewalk between coordinates 18.470734952129916, -66.71510059928289 and 18.470497496435033, -66.71504180443151 is in an advanced state of deterioration, with an uneven surface filled with potholes and cracks. This condition makes movement more difficult and increases risks, especially for



V.R.R. and F.R.R., who rely on their mobility devices. To resolve this barrier, it is recommended to carry out a complete rehabilitation of the sidewalk, leveling the surface, repairing cracks and potholes, and ensuring that the sidewalk is free of obstacles such as hydraulic valves and trees. Additionally, the overgrown vegetation that interrupts the sidewalk should be removed, leaving a completely accessible and safe path. In another section of the same street, between coordinates 18.47127727765751, -66.71523585847899 and 18.471000647470625, -66.7151773145332, the sidewalk is extremely narrow and severely deteriorated, with cracks and depressions that make passage difficult, along with vegetation obstructing the path. This restricted space presents a constant challenge for the children and their caregiver. The solution to this barrier involves widening the sidewalk and repairing the structural damage, eliminating the cracks and depressions. It is also essential to remove the vegetation blocking the path, ensuring a sufficient space for people with mobility devices to safely pass. Finally, the access ramp located at coordinates 18.471005724134237, -66.7151839320263, is not positioned at a corner, which reduces its functionality and safety. A ramp should be strategically placed at corners to ensure a smooth and safe transition between the sidewalk and the roadway, avoiding unnecessary detours and reducing risks for pedestrians. Relocating this ramp to a corner would ensure safer and more direct access for Mr. Ramón and his children. Implementing these solutions would not only improve the mobility of V.R.R. and F.R.R., who rely on their mobility devices to move safely, but also reduce the physical and emotional strain on Mr. Ramón, who, as their primary caregiver,

faces an additional burden due to these barriers. Addressing these issues would greatly improve the family's quality of life, providing them with safer, more comfortable, and obstacle-free access.

71. Mr. Ramón and his children, V.R.R. and F.R.R., are interested in traveling along Street Pura Giraud, Arecibo, PR 00612-0000, due to the variety of recreational places of special interest, such as the green areas that offer a pleasant and relaxing environment. However, they are aware of the architectural barriers in the area that hinder their mobility and make them feel discouraged from going. Despite their interest in enjoying these spaces, Mr. Ramón and his children, V.R.R. and F.R.R., have been aware of the barriers since January 2025, and although they have wanted to visit in February and March of 2025, they have not done so due to these access difficulties, which has led to their discouragement in making the trip.
72. Mr. Ramón and his children, V.R.R. and F.R.R., intend to visit Pura Giraud Street, Arecibo, PR 00612-0000, in the next four months, in order to enjoy the commercial and recreational places, as well as the green areas in the area. Despite being aware of the architectural barriers that hinder their access and make them feel discouraged, they remain interested in returning in the near future. However, they hope that these barriers will be resolved so they can enjoy the visit comfortably and safely, without the difficulties they have experienced previously. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the following barriers at Pura Giraud Street, Arecibo, PR 00612-0000:
  - 72.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located on Pura Giraud Street, Arecibo, PR 00612-0000, between coordinates

18.470987082277926, -66.71456699521607 to coordinates 18.470803275805835, -66.71505649834246, is obstructed by poles, traffic signs, and advertising structures, which significantly reduce the available walking space. These obstacles greatly hinder movement, especially for V.R.R. and F.R.R., who rely on their convoys to move. For the children, maneuvering with extreme precision to avoid these obstacles is not only physically exhausting but also increases their frustration and sense of helplessness, as they cannot move freely. This barrier increases the risk of falls, which causes anxiety and makes them feel unsafe in their environment. Moreover, the additional physical effort required to navigate these obstacles negatively impacts their emotional well-being, causing a considerable impact on their quality of life. For Mr. Ramón, as their primary caregiver, this situation becomes an additional emotional and physical burden, as he must remain constantly alert to protect his children, which contributes to his exhaustion and stress.

- 72.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located on Pura Giraud Street, Arecibo, PR 00612-0000, between coordinates 18.470987082277926, -66.71456699521607 and 18.470803275805835, -66.71505649834246, is in an advanced state of deterioration, with cracks and level differences that make safe passage difficult. For V.R.R. and F.R.R., who rely on their convoys, these imperfections in the surface greatly increase physical fatigue. Each additional effort to maintain balance and move forward increases the risk of falls and injuries, which severely affects their stability. The cracks and uneven surfaces make the children feel unsafe and vulnerable, as they must

constantly focus to avoid tripping, which affects their confidence and overall well-being. Additionally, the uneven terrain increases physical pain and discomfort, preventing them from enjoying their daily walks. For Mr. Ramón, the constant physical effort required to assist his children as they navigate these difficult conditions contributes to his exhaustion and emotional stress, as he must always be vigilant to prevent his children from suffering an accident. This situation not only affects the children's mobility and safety but also the overall quality of life for the entire family.

72.3. In addition to the obstacles already mentioned, Mr. Ramón and his children, V.R.R. and F.R.R. are aware that at the corner of the sidewalk located on Calle Pura Giraud, Arecibo, PR 00612-0000 with coordinates 18.470793463879577, -66.71505095345239, there are no accessible ramps, which significantly hinders their mobility. The lack of these ramps prevents smooth and safe passage, severely affecting V.R.R. and F.R.R.'s ability to move independently. Both children rely on a convyos device for mobility, and the absence of ramps increases the physical effort required to move, causing discomfort and fatigue. Mr. Ramón, as their primary caregiver, is constantly required to assist his children, leading to considerable emotional, physical, and mental strain. This situation not only limits the family's independence but also poses a risk to their well-being as they are forced to face these additional obstacles in their daily lives.

72.4. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the condition of the sidewalk located on Street Pura Giraud, Arecibo, PR 00612-0000, from coordinates 18.4707725140603, -66.71513819447664 to coordinates

18.47061746296984, -66.71566688756762, significantly hinders their mobility. The surface is consistently uneven, with potholes, cracks, and depressions that make their journey unstable and unsafe. These conditions not only affect their ability to move smoothly but also increase the risk of sudden jolts and instability that can compromise their balance. For V.R.R. and F.R.R., who rely on their convoys, these imperfections in the sidewalk create an ongoing challenge. Every dip or crack in the pavement requires extra effort to maintain stability and avoid abrupt movements that can impact their comfort and well-being. The repeated impact of their wheels against such an irregular surface places additional strain on them, increasing fatigue and making their daily travel even more difficult. Mr. Ramón, as their primary caregiver, also experiences the effects of these barriers. The constant need to remain vigilant and assist his children in navigating potholes and depressions demands continuous physical and mental effort. The lack of proper sidewalk maintenance not only disrupts their mobility but also negatively impacts his and V.R.R. and F.R.R.'s quality of life.

- 72.5. Furthermore, Mr. Ramón and his children are aware that there is a significant issue at the corner of the sidewalk located on Calle Pura Giraud, Arecibo, PR 00612-0000, at coordinates 18.470762723072742, -66.71515369528008, where there is no accessible ramp, which severely prevents his children from accessing the sidewalk easily. The absence of this ramp at the corner blocks their ability to transition between sections of the sidewalk, creating a significant obstacle for V.R.R. and F.R.R., who rely on mobility devices, specifically Convoys, to move. This lack of accessibility not only prevents them from advancing safely but also

increases the physical effort required to move, which is especially difficult for the children due to their medical conditions. The uneven terrain and the inability to use the ramp to access the sidewalk causes fatigue, pain, and a heightened risk of falls, further limiting their independence. Additionally, this situation increases emotional stress for both the children and Mr. Ramón, who must constantly assist them, intensifying the physical and mental effort required to navigate this environment.

- 72.6. To address the barriers identified on Pura Giraud Street, Arecibo, PR 00612-0000, several solutions are proposed that would facilitate the mobility of Mr. Ramón and his children, V.R.R. and F.R.R., and improve their quality of life. First, it is essential to remove the obstacles on the sidewalk, such as poles, traffic signs, and advertising structures, which take up significant space and hinder pedestrian movement, especially for those using mobility devices. These structures should be relocated to areas where they do not interfere with the sidewalk, ensuring adequate space for safe circulation for pedestrians, including those who rely on a convoy. Regarding the deteriorated sidewalk, it is recommended to repair the cracks, potholes, and depressions affecting the surface, leveling the terrain to ensure a more stable and safe passage. These repairs would significantly reduce the risk of falls and improve stability, allowing V.R.R. and F.R.R. to move more easily without the additional fatigue they currently experience when trying to navigate obstacles. Improving the surface would also have a positive impact on the children's well-being, reducing the physical pain and discomfort they face due to the uneven terrain. In relation to the lack of accessible ramps at the corners, it is

essential to install appropriate ramps at all intersections, particularly at the corners where none currently exist. The ramps should be strategically placed to ensure a smooth and barrier-free transition between the sidewalk and the street, enabling people with reduced mobility, like V.R.R. and F.R.R., to access the space more easily and comfortably. This intervention would not only increase the children's independence but also reduce the physical effort Mr. Ramón has to exert to assist them. The implementation of these solutions would significantly improve accessibility on Pura Giraud Street, allowing Mr. Ramón and his children to travel safely and comfortably, eliminating the physical and emotional barriers they currently face. This would not only benefit their mobility but also contribute to a better quality of life for the entire family.

73. Mr. Ramón and his children, V.R.R. and F.R.R., are interested in visiting Street Cristobal Colón Street, Arecibo, PR 00612-0000, due to the variety of restaurants in the area that offer a range of products and services that attract them, as Subway and Pitos sándwich Pernil, places where V.R.R. and F.R.R. always get excited when they have the opportunity to choose from a variety of fresh and tasty ingredients to customize their sandwiches to their liking. Or also Gyros' Express, where they are especially excited when choosing between juicy burgers, crispy chicken, and fresh shrimp, all made to order. . However, they have been aware of the architectural barriers in the area since January 2025, which has discouraged them from making the trip. Despite their interest, they wanted to go in February and March, but the knowledge of these barriers has discouraged them from doing so, as the accessibility challenges affect their mobility and well-being.

74. Mr. Ramón and his children, V.R.R. and F.R.R., intend to travel along Cristobal Colón Street, Arecibo, PR 00612-0000, in the coming months, as they are interested in enjoying the shops and services the area has to offer. Despite the architectural barriers they have identified, they still wish to return, hoping that the accessibility conditions will improve so they can move more comfortably and safely. However, the knowledge of the current barriers has dissuaded them from doing so until these issues that hinder their mobility and cause discomfort are resolved. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the following barriers at Street Cristobal Colón, Arecibo, PR 00612-0000:

74.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the ramp located at Street Cristobal Colón, Arecibo, PR 00612-0000, at coordinates 18.471286283731512, -66.71516713229595, in front of Programa WIC Puerto Rico, has an inadequate slope and a reduced size, making it narrow and barely functional. Its design does not allow for safe or comfortable access, as the excessive incline makes ascending and descending difficult, while the insufficient width restricts the space needed to move easily. These conditions not only create an obstacle in their daily mobility but also increase the risk of instability and accidents. For V.R.R. and F.R.R., who rely on a mobility device to get around, the steep slope of the ramp requires significant effort to ascend, increasing their fatigue and affecting their stability. Similarly, the limited width prevents them from moving freely, forcing them to perform complicated maneuvers that can compromise their safety. Each attempt to use the ramp becomes a challenge that causes discomfort, anxiety, and additional physical strain, making their mobility even more difficult. Mr. Ramón, as their primary caregiver, also faces the impact



of these barriers. Assisting his children on a ramp with an improper slope and size requires continuous physical effort, contributing to his daily exhaustion. Additionally, the concern for V.R.R. and F.R.R.'s safety, along with the frustration of lacking accessible infrastructure, affects his emotional and mental well-being. The lack of a well-designed ramp not only makes their mobility more challenging but also restricts their autonomy and overall well-being.

74.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located on Street Cristobal Colón, Arecibo, PR 00612-0000, from coordinates 18.47117902990164, -66.71565311295379 to coordinates 18.471265743440977, -66.71525242139097, is in a severe state of deterioration, with cracks, potholes, craters, and uneven surfaces that make mobility difficult. Water accumulates in the sunken areas, increasing the risk of slipping and making the terrain even more unstable. Additionally, overgrown vegetation and grass have spread across parts of the surface, reducing the available space and forcing them to maneuver with difficulty to continue their journey. For V.R.R. and F.R.R., who rely on a mobility device, these conditions create a constant physical strain and increase their fatigue, as the uneven ground affects their stability and makes every trip uncomfortable and exhausting. Mr. Ramón also experiences physical and emotional strain as he assists his children in navigating such a deteriorated environment, where any uneven surface or water accumulation can pose a risk to their safety. The lack of proper sidewalk maintenance not only obstructs their daily mobility but also adds to his worry and exhaustion as he cares for his children under such inaccessible conditions.

74.3. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located on Street Cristobal Colón, Arecibo, PR 00612-0000, from coordinates 18.47117902990164, -66.71565311295379 to coordinates 18.471265743440977, -66.71525242139097, is obstructed by various elements that hinder their mobility. Poles and garbage bins have been placed in pedestrian areas, significantly reducing the available space and creating barriers that limit their ability to move freely. These obstructions force them to stop and make unnecessary maneuvers, increasing physical effort and discomfort during their journey. For V.R.R. and F.R.R., who depend on a mobility device for transportation, these obstacles present a constant challenge. The lack of a clear path prevents them from moving freely and safely, leading to frustration and forcing them to modify their trajectory abruptly, which may compromise their stability. Mr. Ramón, as their primary caregiver, also faces additional difficulties in assisting them in navigating these obstacles. The constant need to find alternative routes or maneuver through narrow spaces adds to his physical and mental exhaustion. The presence of these barriers on the sidewalk not only limits their daily mobility but also affects their peace of mind, as they should be able to move without unnecessary restrictions or safety risks.

74.4. In addition to these improvements, the ramp located on Street Cristobal Colón, Arecibo, PR 00612-0000, at coordinates of 18.471265394426908, -66.71525334901285, must be properly redesigned to meet accessibility standards. Adjusting its dimensions, ensuring a suitable slope, and expanding its width would allow for a smoother and safer transition between different levels,

eliminating the current barriers that make it difficult to use. By implementing these solutions, V.R.R. and F.R.R. would experience a significant improvement in their mobility, reducing the physical strain that each trip currently imposes on them. Mr. Ramón, as their primary caregiver, would also feel relief from the constant concern and effort required to assist them under unsafe conditions. These adjustments not only restore their ability to move freely but also provide them with the confidence and security they need to navigate their surroundings without unnecessary difficulties.

- 74.5. To ensure safe and accessible mobility for V.R.R. and F.R.R., it is essential to redesign the ramp with appropriate dimensions and a suitable slope. The incline should be adjusted to allow for a smooth ascent and descent without requiring excessive physical effort, while the width must be expanded to provide sufficient space for maneuverability. These modifications would eliminate the current obstacles that make using the ramp difficult and unsafe. Additionally, implementing a maintenance plan would help prevent future deterioration, ensuring that the ramp remains functional over time. By making these improvements, V.R.R. and F.R.R. would be able to move independently and safely, reducing their physical strain and improving their overall quality of life. Their father, Mr. Ramón, would also experience relief from the constant concern and physical effort required to assist them, allowing for greater ease and security in their daily mobility. In addition to these changes, it is crucial to redesign the sidewalk, as the deteriorated pavement, cracks, potholes, and water accumulation in sunken areas make mobility difficult and increase the risk of slipping. The

presence of overgrown vegetation and obstacles such as poles and garbage bins in pedestrian areas also reduces the available space, forcing them to perform difficult and dangerous maneuvers. These barriers obstruct free and safe movement for V.R.R. and F.R.R. and increase the physical and emotional strain on their father. By improving the accessibility of the sidewalk and removing these obstacles, V.R.R. and F.R.R. would be able to move more comfortably, and Mr. Ramón would be able to care for them with less physical effort and greater peace of mind.

75. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., feel a deep connection to the history and cultural richness of Arecibo. For them, exploring the city's historical sites as Lady Liberty Arecibo or PR Flag Arecibo, is not just a recreational activity but also a way to learn, reflect, and strengthen their identity with the place they consider home. The colonial architecture, iconic monuments, and streets that have witnessed past generations awaken in them a genuine admiration and a constant desire for exploration. Due to the above, they wish to travel on Street Gonzalo Marin, Arecibo, PR 00612-0000, as it is a useful route to access various historical monuments such as the Lady Liberty Arecibos. However, they are aware that there are architectural barriers, which is why they feel discouraged. They have been aware of these barriers since December 2024, but they have wanted to go in January and February of 2025; however, due to their knowledge of the barriers, they have not been able to do so.
76. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., intend to return to Street Gonzalo Marin, Arecibo, PR 00612-0000, within the next two months to visit the Lady Liberty Arecibo, a monument that represents an important cultural and historical connection for

them. However, they are discouraged by the continued presence of accessibility barriers that hinder their mobility. The barriers are:

- 76.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.472839175648947, -66.71246633590847 to coordinates 18.472729783383098, -66.71241738559719, in front of Porcell Cocina, is in a highly deteriorated state, with deep cracks from which grass grows, large craters, and noticeable sinkholes. These conditions create an unsafe and unstable surface, increasing the risk of sudden jolts and movements that can affect the stability and well-being of V.R.R. and F.R.R. The poor state of the pavement forces them to exert extra effort to move forward, making their journey uncomfortable and exhausting. For Mr. Ramón, this represents an additional burden, as he must navigate an environment that can't provide safe and accessible passage for all.
- 76.2. Mr. Ramón and his children, V.R.R. and F.R.R., are also aware that the sidewalk's surface located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.472839175648947, -66.71246633590847 to coordinates 18.472729783383098, -66.71241738559719, in front of Porcell Cocina, is irregular, with a noticeable incline that affects their ability to navigate it safely. This uneven ground makes their mobility more challenging, as it increases the risk of instability and requires constant adjustments to maintain balance. The tilted surface makes movement unpredictable and physically demanding, further discouraging them from using the sidewalk. For Mr. Ramón, assisting his children

on such an unstable surface adds to his physical strain, turning a simple journey into a difficult and frustrating experience.

- 76.3. Additionally, Mr. Ramón and his children, V.R.R. and F.R.R., are aware that certain sections of the sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.472839175648947, -66.71246633590847 to coordinates 18.472729783383098, -66.71241738559719, in front of Porcell Cocina, are obstructed due to the presence of poles and other objects placed along the path. These obstacles significantly reduce the available space for movement, forcing them to maneuver around them or, in some cases, making it impossible to continue. The presence of these obstructions further complicates their mobility and creates unnecessary barriers that limit their ability to navigate the city safely. For Mr. Ramón, encountering these obstacles means additional effort and stress.
- 76.4. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk at the corner located on Street Gonzalo Marin, Arecibo, PR 00612-0000, at coordinates 18.472724907889987, -66.71242798083365 does not have an accessible ramp. The absence of a proper slope makes it impossible for them to transition smoothly between different levels, forcing them to seek alternative routes that are not always safe or practical. For V.R.R. and F.R.R., this lack of accessibility limits their independence, as they are unable to navigate the sidewalk freely. Mr. Ramón, who accompanies and assists them, faces additional physical and emotional strain in trying to find solutions to the issue. The lack of a ramp significantly restricts their right to move safely and comfortably.

- 76.5. One of the main barriers that Mr. Ramón and his children face, and of which they are aware, is the narrowness of the sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.47262925222778, -66.71147299290047 to coordinates 18.47265532831292, -66.7120060819219, in front of Paseo de las Dama, caused by overgrown vegetation. This significantly reduces the available walking space, making mobility difficult and preventing them from moving comfortably and safely. The lack of a clear path forces them to maneuver constantly, increasing their physical effort and the risk of accidents. For Mr. Ramón's children, who require stability and a predictable environment to move safely, this obstacle poses a constant threat to their security and well-being.
- 76.6. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that on the sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.472645762545476, -66.71260945150968 to coordinates 18.472600838343983, -66.7127571841263, the pavement is deteriorated, with an uneven surface, potholes, and cracks. This irregular terrain makes it more difficult for them to move, as it requires additional physical effort, especially for V.R.R. and F.R.R., who rely on their convoys for mobility. The cracks and potholes increase the risk of falls, which causes them constant concern and additional fatigue. The poor condition of the sidewalk, due to inadequate repairs, makes every movement uncomfortable, exhausting, and potentially dangerous, which affects both the children and their father, Mr. Ramón, who is constantly offering assistance and facing physical and emotional wear and tear due to the situation.

76.7. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that on the same sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.472645762545476, -66.71260945150968 to coordinates 18.472600838343983, -66.7127571841263, there are obstructions caused by elements such as a hydraulic valve and trees that invade the pedestrian space. These obstacles further reduce the available space for movement, forcing the children to make difficult maneuvers with their convoys, which increases the risk of losing balance or tripping. For V.R.R. and F.R.R., using their convoys in such a confined space adds extra physical effort, which increases their fatigue and the likelihood of accidents. Mr. Ramón, assisting his children, is also affected by the need to constantly watch out for these obstacles, which creates an additional physical and emotional burden, as he must be prepared to act quickly in case any of these elements pose a danger.

76.8. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that in some sections of the sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, from coordinates 18.472645762545476, -66.71260945150968 to coordinates 18.472600838343983, -66.7127571841263, the pavement is almost non-existent or interrupted due to the growth of weeds and the presence of other elements that block the path. This lack of continuous pavement and natural obstacles prevent them from moving safely and smoothly. For the children, who rely entirely on their convoys, these interruptions create an additional barrier, making each movement more difficult and tiring. The weeds and other elements along the way can cause tripping or even cause the convoys to get stuck, which increases anxiety



and the risk of injury. For Mr. Ramón, these barriers mean constant vigilance and physical effort, putting him in a situation of significant physical and mental stress, as he must constantly supervise his children while navigating such a challenging environment.

76.9. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk at the corner located on Street Gonzalo Marin, Arecibo, PR 00612-0000, at coordinates 18.47264756482775, -66.71172447145842, does not have an accessible ramp, which prevents them from safely accessing the sidewalk. The absence of this ramp makes it impossible for them to move comfortably and safely, especially for V.R.R. and F.R.R., who rely on their convoys for mobility. Without an appropriate ramp, the children face a steep incline or a step, which requires significant physical effort and increases the risk of falls or accidents. Mr. Ramón, as their caregiver, must provide additional assistance to help his children overcome this barrier, creating a considerable physical and emotional burden. The lack of accessibility at this corner significantly hinders their ability to move independently and comfortably, affecting both their well-being and their father's peace of mind, as he must constantly be vigilant about their safety.

76.10. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the ramp on the sidewalk located on Street Gonzalo Marin, Arecibo, PR 00612-0000, at coordinates 18.47278949200594, -66.71215299710431, is inaccessible due to its steep incline. This ramp is dangerous for the children, who rely on their convoys for mobility. The excessive incline forces the children to exert significant physical effort to go up or down, which not only increases the risk of falls and accidents

but also causes extreme physical exhaustion. For V.R.R. and F.R.R., this condition makes the journey uncomfortable and jeopardizes their stability and safety, creating constant anxiety. Mr. Ramón, as their caregiver, is forced to intervene constantly to prevent the children from losing their balance or suffering injuries, which increases his emotional and physical burden. The inaccessibility of this ramp severely limits the family's ability to move independently and safely, affecting the children's quality of life and their father's peace of mind as he must always be alert to any potential dangers.

- 76.11. To ensure safe and accessible mobility for Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to address the deteriorated sidewalk conditions on Street Gonzalo Marin, Arecibo, PR 00612-0000. First, the sidewalk should be repaired and resurfaced to eliminate deep cracks, large craters, and noticeable sinkholes, creating a smoother and safer surface for travel. Proper maintenance and regular inspections would prevent future deterioration, ensuring the sidewalk remains safe and accessible for all. These improvements would reduce the extra physical effort currently required by V.R.R. and F.R.R. to move forward, making their journey more comfortable and less exhausting. This would also alleviate Mr. Ramón's physical and emotional burden, enabling him to assist his children more easily and with less strain. The sidewalk in front of Porcell Cocina also requires adjustments to the incline. To enhance safety and accessibility, the uneven surface should be leveled, and the sidewalk should be designed with a more gradual slope to avoid instability. This adjustment would help reduce the unpredictable and physically demanding nature of the ground, making it easier for V.R.R. and F.R.R.

to move with their convoys. By improving the surface and slope, the risk of falls or accidents would decrease, and the overall comfort and safety of the children would be significantly enhanced. For Mr. Ramón, this solution would reduce his constant vigilance and assist him in providing the care his children need without the additional stress caused by an unstable path. In addition to addressing the pavement condition, the obstruction caused by poles, trees, and other objects along the sidewalk must be removed or relocated. This would create a clear, wide path for movement, reducing the need for V.R.R. and F.R.R. to navigate around obstacles. By increasing the available space, they would have a safer, more accessible route, and their ability to travel independently would be greatly improved. For Mr. Ramón, this would eliminate the physical and emotional stress of constantly maneuvering around these obstructions, allowing him to assist his children more effectively and with greater ease. The absence of an accessible ramp at the corner of Street Gonzalo Marin should also be addressed. Installing a properly designed ramp with an appropriate slope would allow V.R.R. and F.R.R. to transition smoothly between different levels without exerting excessive effort or risking falls. This would greatly enhance their mobility, granting them the independence to access the sidewalk safely. The addition of a ramp would significantly reduce the physical and emotional strain on Mr. Ramón, as he would no longer need to seek alternative routes or provide constant assistance in overcoming this barrier. By ensuring a safe and accessible route, the family's ability to navigate the city freely and confidently would be restored. Finally, to improve the narrow sections of the sidewalk caused by overgrown vegetation, the

area should be regularly maintained to prevent plants from blocking the path. Clearing the vegetation would create a more spacious and safer walking environment, reducing the physical effort required to navigate and minimizing the risk of accidents. These improvements would provide V.R.R. and F.R.R. with a safer, more accessible space to move through, while also easing Mr. Ramón's responsibilities as their caregiver. Together, these changes would significantly improve their overall quality of life, making daily mobility easier, safer, and more independent.

77. Mr. Ramón Rivera and his children, V.R.R. and F.R.R., deeply enjoy the sound of the ocean waves, a passion that connects them with the tranquility and energy of the sea. For this reason, they often visit routes that bring them closer to this environment, seeking spaces where they can fully enjoy the harmony of the ocean. It is precisely for this reason that they wish to use the sidewalk located at 680 Av. Victor Rojas, Arecibo, PR 00612-0000, as it allows them to connect with the sound of the waves they so deeply appreciate. However, since December 2024, Mr. Ramón and his children, V.R.R. and F.R.R., have been aware of the existence of architectural barriers that not only prevent them from using the sidewalk but also discourage them. Although they have wanted to go in January and February, 2025, due to their knowledge of the barriers, they have not been able to do so.
78. Mr. Ramón and his children, V.R.R. and F.R.R., intend to return to the sidewalk located at 680 Av. Victor Rojas, Arecibo, PR 00612-0000, within the next four months to once again enjoy the sound of the ocean. Despite the difficulties, they hope that the barriers can be overcome and that there will be an accessible space where they can enjoy their

walk and the view of the sea. They are determined to return, but they will only do so if the accessibility conditions improve, allowing them to move safely and without obstacles. Mr. Ramón and his children, V.R.R. and F.R.R., personally identified the following barriers at 680 Av. Victor Rojas, Arecibo, PR 00612-0000:

- 78.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located on 680 Av. Victor Rojas, Arecibo, PR 00612-0000, from coordinates 18.473295482367703, -66.71265646084154 to coordinates 18.473370355727052, -66.71406612321384 is visibly worn out, with cracks, uneven surfaces, and fractures that make it difficult to use. The irregular surface not only makes the route uncomfortable but also increases the risk of jolts and abrupt movements that affect their stability. For V.R.R. and F.R.R., who rely on their convoys as a mobility device, these irregularities present a significant barrier that requires extra physical effort to navigate. The cracks and uneven surfaces cause the convoys to get stuck or slip unexpectedly, increasing the risk of falls and injuries. This situation causes discomfort, extreme exhaustion, and constant anxiety for the children. For Mr. Ramón, who accompanies and assists them in their mobility, this situation represents a constant physical and emotional burden. He must always be alert to the conditions of the path, which increases his level of stress and fatigue, as he must intervene quickly to ensure his children's safety.
- 78.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located at 680 Av. Victor Rojas, Arecibo, PR 00612-0000, from coordinates 18.473295482367703, -66.71265646084154 to 18.473370355727052, -66.71406612321384, is interrupted by a point where the sidewalk is completely

impassable due to its deterioration. This interruption on the sidewalk prevents them from continuing their route, forcing them to look for alternative paths that are not always safe or accessible. For V.R.R. and F.R.R., who rely on their convoys for mobility, this impassable section represents a significant barrier, as they cannot proceed without facing an obstacle that requires considerable physical effort or even forces them to turn back and find another way. This situation not only causes them discomfort but also increases their fatigue and anxiety, as they must constantly maneuver in search of a viable route. For Mr. Ramón, having to find alternatives and ensure his children stay safe in such a deteriorated environment, creates a continuous physical and emotional burden, further exacerbating the stress and exhaustion he faces as a caregiver.

- 78.3. Mr. Ramón and the children, V.R.R. and F.R.R., are aware of the deteriorated and uneven surface of the sidewalk located on 680 Av. Víctor Rojas, Arecibo, PR 00612-0000, from coordinates 18.473688005300456, -66.71631844307902 to coordinates 18.473488333118166, -66.71534877370478, in front of Clinical Laboratory Parking Lot (Estacionamiento Laboratorio Clínico Toledo)., with deep cracks, craters, and significant sinkholes that create a completely irregular path. For V.R.R. and F.R.R., whose medical condition, of muscular and spinal atrophy, requires a stable surface to avoid the risk of falls or injuries, this situation represents a constant threat. The cracks and sinkholes make every step unpredictable and dangerous, forcing the children to proceed with extreme caution, increasing their fatigue and generating a constant fear of falling or getting injured. The instability of the surface affects their stability and worsens their

mobility, making every journey difficult and impacting their physical and emotional well-being. For Mr. Ramón, as a caregiver, this situation represents a significant physical and emotional burden. Constantly having to assist his children to prevent falls or accidents increases his physical effort, leaving him exhausted. Additionally, the constant worry for his children's safety and the need to remain vigilant creates great stress and emotional strain. This makes the caregiving process even more difficult and exhausting, as the condition of the path complicates every movement and increases the risk of injury for both the children and him.

- 78.4. Mr. Ramón and his children are aware of the abrupt drop on the sidewalk at the corner located on 680 Av. Victor Rojas, Arecibo, PR 00612-0000, at coordinates 18.473807623528888, -66.71721249134966, where the absence of an accessible ramp makes a safe descent impossible. For V.R.R. and F.R.R., who rely on the Convoy device due to spinal muscular atrophy, this barrier severely limits their mobility and independence. The sudden level change forces the children to seek alternative routes, which are often unsafe, or to depend entirely on their father for assistance, adding extra physical effort and increasing their discomfort. This lack of accessibility raises the risk of falls, making every attempt to navigate the area a distressing experience, which not only causes emotional frustration but also a constant concern for their safety. Mr. Ramón, as their caregiver, is forced to intervene constantly to prevent his children from getting hurt or falling, significantly increasing his physical and emotional burden. The need to always stay alert, searching for alternative routes and ensuring his children's safety in

such an unsafe environment, generates great fatigue. This situation not only impacts the children's physical well-being but also his, as he is constantly worried about the conditions of the path, which exacerbates the stress and mental exhaustion he is under.

78.5. Mr. Ramón and his children are aware of the absence of an accessible ramp on the sidewalk at the corner located on 680 Av. Victor Rojas, Arecibo, PR 00612-0000, at coordinates 18.473807623528888, -66.71721249134966. This lack of a ramp prevents them from accessing the sidewalk safely, especially for V.R.R. and F.R.R., who rely on the convoys device due to spinal muscular atrophy. The absence of an appropriate ramp forces them to face an abrupt drop or a steep incline, which requires significant physical effort and increases the risk of falls or injuries. The lack of accessibility limits their independence, as they depend entirely on their father to overcome this obstacle, causing discomfort, exhaustion, and frustration. For Mr. Ramón, as a caregiver, this barrier represents a considerable physical and emotional burden, as he must constantly intervene to assist his children, adding extra stress and increasing his fatigue. The absence of an accessible ramp not only affects the family's ability to move safely but also worsens the difficulties they face in their daily lives, impacting their physical and emotional well-being.

78.6. Mr. Ramón and his children are aware that on the sidewalk at the corner located on 680 Av. Victor Rojas, Arecibo, PR 00612-0000, at coordinates 18.473821325791967, -66.7173784389283, there is no accessible ramp. This lack of a ramp prevents safe access to the sidewalk, creating a significant barrier for



V.R.R. and F.R.R., who rely on convoys for mobility. Without an appropriate ramp, they face a steep incline that forces them to exert extra physical effort and increases the risk of falls or accidents. Additionally, the absence of this infrastructure limits their ability to move independently, as they rely entirely on their father's assistance, which causes discomfort and frustration. For Mr. Ramón, as a caregiver, this situation places an additional burden on him, as he must constantly be alert to assist his children, increasing his stress and fatigue. The lack of an accessible ramp not only hinders mobility but also impacts their overall well-being and peace of mind on a daily basis.

- 78.7. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located on Av. Victor Rojas, Arecibo, PR 00612-0000, at coordinates 18.47329534463549, -66.71284035690225 to coordinates 18.473240232485402, -66.71303509173973, is extremely narrow. This lack of space makes mobility very difficult and dangerous, especially for V.R.R. and F.R.R., who rely on their convoys for movement. The narrowness of the sidewalk forces them to maneuver with difficulty, which increases the risk of falls or accidents. For V.R.R. and F.R.R., every step becomes a challenge, as the reduced distance makes it harder to move fluidly and safely. This situation not only causes them discomfort but also increases their anxiety, as they feel the path does not provide enough space to move safely. Mr. Ramón, as their caregiver, is forced to constantly assist his children, which adds physical effort and a high level of stress and exhaustion, as he must be alert at all times to ensure their safety in such a confined space.

- 78.8. Mr. Ramón and his children, V.R.R. and F.R.R., are also aware of the severe deterioration of the sidewalk, which features potholes, cracks, weeds, and areas covered in grass or turf along the route on 680 Av. Victor Rojas, Arecibo, PR 00612-0000, at coordinates 18.47329534463549, -66.71284035690225 to coordinates 18.473240232485402, -66.71303509173973. This condition makes the surface uneven and dangerous to walk on. For V.R.R. and F.R.R., who use their convoys, the irregular terrain significantly increases the physical effort required to move, causing fatigue and discomfort. The cracks and potholes cause the convoys to get stuck or slide unexpectedly, which increases the risk of falls and serious injuries. Additionally, the presence of weeds and grass makes the path even harder to navigate, as the convoys can get tangled, further increasing the risk of the children losing their balance. For Mr. Ramón, this means being constantly vigilant, which increases his exhaustion and stress as he must monitor every step to prevent accidents. The constant worry for his children's safety puts him in a state of emotional and physical stress, as he must be ready to intervene quickly.
- 78.9. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of an interruption of the sidewalk located on 680 Av. Victor Rojas, Arecibo, PR 00612-0000, at coordinates 18.47329534463549, -66.71284035690225 to coordinates 18.473240232485402, -66.71303509173973, due to an entirely irregular and impassable terrain. This barrier forces the children to stop and look for an alternative route, which increases the risk of incidents and further limits their independence. For V.R.R. and F.R.R., this means they must rely completely on their father to continue their journey, which generates frustration, physical

exhaustion, and emotional strain. Having to constantly depend on their father to navigate these obstacles makes them feel a sense of incapacity and helplessness, affecting their emotional well-being. The interruption of the route not only presents an immediate physical danger but also makes it harder for them to live their daily lives with more autonomy and safety. For Mr. Ramón, this barrier represents an additional burden as he must constantly watch over his children, which increases his fatigue and stress levels.

- 78.10. The Municipality has the responsibility to ensure that public pathways are accessible and safe for all citizens, including those with mobility disabilities, as is the case with V.R.R. and F.R.R. By being aware of the architectural barriers and the deterioration of the infrastructure on the sidewalk located at 680 Av. Victor Rojas, Arecibo, PR 00612-0000, the Municipality has a duty to intervene and address these deficiencies, allowing individuals to move independently and safely. The Municipality's inaction on this issue not only perpetuates discomfort and risk for the affected individuals but also contributes to a form of structural discrimination by denying them access to an environment that should be inclusive. The failure to respond to these barriers demonstrates indifference toward the needs of people with disabilities, worsening their marginalization and reinforcing social inequalities. By not taking the necessary measures, the Municipality allows this situation to continue, negatively impacting the quality of life for those who need support the most, and ensuring that people with reduced mobility are treated unequally.

78.11. To ensure safe and accessible mobility for Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to address the barriers they face on the sidewalk located at 680 Av. Victor Rojas, Arecibo, PR 00612-0000. The first solution should be to repair and level the sidewalk, eliminating cracks, potholes, and uneven areas. These repairs would provide a more stable and safe surface, significantly reducing the risk of falls and accidents. Additionally, these improvements would reduce the physical effort required for V.R.R. and F.R.R. to move with their convoys, alleviating the fatigue and anxiety they currently experience. For Mr. Ramón, this would ease the physical and emotional burden by making it easier to care for his children, allowing him to be less focused on the dangers of the path and more at ease in his role as a caregiver. It is also essential to address the interruption of the sidewalk, which is located on completely irregular and impassable terrain. Instead of this interruption, a continuous path should be created to allow safe passage, with an accessible ramp or alternative route that facilitates travel without risks. By providing an adequate solution to this interruption, V.R.R. and F.R.R. would be able to move independently and safely, eliminating the need to seek improvised routes that are often neither accessible nor safe. This would not only improve their mobility but also alleviate the frustration and physical and emotional exhaustion they currently experience. Finally, to improve accessibility and safety along the entire route, it is crucial to install an appropriate ramp in areas where the sidewalk lacks access, especially at the point where the level change is abrupt. This ramp would allow V.R.R. and F.R.R. to travel without constantly relying on their father to descend or ascend, giving them more autonomy and reducing the physical

effort needed to move. For Mr. Ramón, this would mean one less burden, as he wouldn't need to intervene every time they encounter a barrier, which would also reduce the stress and fatigue associated with daily caregiving. These solutions would significantly improve the quality of life for Mr. Ramón and his children, providing them with a safer and more accessible route to move, reducing the risk of injury, and increasing their independence and emotional well-being.

79. Mr. Ramón and his children, V.R.R. and F.R.R., wish to use the sidewalk located on Av. José de Diego, Arecibo, PR 00612-0000, in front of Bandera PR Arecibo. Their goal is to visit places such as Callejón del Beso, renowned for its high-quality seafood and excellent customer service, and the Statue of Liberty of Arecibo, as these visits allow them to connect with the city's history and culture. Mr. Ramón and his children, V.R.R. and F.R.R., enjoy strolling through these streets and exploring monuments, as these experiences not only break their routine but also give them the opportunity to discover restaurants that serve their favorite dishes.
80. However, since January 2025, they are aware of the architectural barriers that prevent them from using this sidewalk properly and comfortably, making them feel dissuaded. Although they wanted to use it between February and March 2025, they decided not to do so. This situation has caused them frustration and disappointment, as the inability to move freely through this space has limited their right to enjoy the city and has affected their sense of inclusion. Despite this, Mr. Ramón and his children, V.R.R. and F.R.R. has the intention to visit the street in the next three months, to explore the area and savor the seafood at Callejón del Beso, known as the best place to enjoy it in Arecibo, but they are

currently dissuaded from doing so due to the persistent presence of accessibility barriers.

Mr. Ramón and his children, V.R.R. and F.R.R., The barriers are:

- 80.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located at Av. José de Diego, Arecibo, PR 00612-0000, from coordinates 18.47286359597812, -66.71238801826166 to coordinates 18.47287948732238, -66.71292909674295, has an uneven surface due to surface deterioration with deep cracks. These cracks and fissures in the pavement make the sidewalk difficult and dangerous to walk on. The convoy used by V.R.R. and F.R.R. shakes abruptly due to the irregularities in the ground, causing discomfort and increasing the risk of damage to the device. These constant vibrations cause physical discomfort for the children, who, due to their spinal muscular atrophy, lack the strength to stabilize themselves within the device, increasing the risk of falls and preventing them from moving safely.
- 80.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located at Av. José de Diego, Arecibo, PR 00612-0000, from coordinates 18.47286359597812, -66.71238801826166 to coordinates 18.47287948732238, -66.71292909674295, is narrow, making it difficult for the children's convoy to pass properly. The lack of space forces V.R.R. and F.R.R. to maneuver in a restricted area, increasing the risk of trips and falls. The narrowness of the sidewalk also creates discomfort when trying to pass, limiting the children's ability to move independently. This narrow space forces Mr. Ramón to be constantly attentive to prevent the convoy from getting stuck or colliding with other obstacles, which increases his physical effort and fatigue.

- 80.3. Mr. Ramón and his children, V.R.R. and F.R.R., also are aware that the sidewalk located at Av. José de Diego, Arecibo, PR 00612-0000, from coordinates 18.47286359597812, -66.71238801826166 to coordinates 18.47287948732238, -66.71292909674295, is obstructed by various obstacles such as light poles, poorly placed traffic signs, and overgrown vegetation encroaching on the path. These obstructions force the children to perform complex maneuvers and constantly detour to avoid the obstacles, increasing travel time and putting the stability of the convoy at risk. Mr. Ramón must be attentive at all times to the difficulties caused by these physical barriers, which leads to greater physical and emotional exhaustion, as well as a sense of insecurity for his children.
- 80.4. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the ramp located at Av. José de Diego, Arecibo, PR 00612-0000, at coordinates 18.472866226335643, -66.71279684398624, has an inadequate slope, creating a steep incline that severely hinders safe passage for the children. V.R.R. and F.R.R., who rely on a mobility device, must exert considerable physical effort to ascend or descend, significantly increasing the risk of falls and loss of stability. This constant difficulty causes great discomfort and increases their fatigue, as they lack the strength to stabilize themselves. This poses a serious risk to their safety and well-being. Mr. Ramón, who must assist them at all times, suffers physical and emotional exhaustion, which intensifies the negative impact of this barrier.
- 80.5. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the ramp located at Av. José de Diego, Arecibo, PR 00612-0000, at coordinates

18.472866226335643, -66.71279684398624, is narrow, severely limiting the circulation space for the children, who use a convoy for mobility. The lack of adequate space forces V.R.R. and F.R.R. to maneuver in a restricted area, increasing the risk of trips and falls, especially when the convoy is obstructed. This not only causes discomfort but also overloads the children physically and emotionally, as they must deal with these obstacles in every movement. Additionally, Mr. Ramón is constantly forced to remain vigilant to prevent accidents, which generates a great deal of stress and fatigue for him, affecting his overall well-being.

80.6. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the ramp located at Av. José de Diego, Arecibo, PR 00612-0000, at coordinates 18.472866226335643, -66.71279684398624, is deteriorated, with cracks and uneven surfaces that create serious difficulties for the children's mobility. The cracks and potholes not only destabilize the convoy used by V.R.R. and F.R.R., but they significantly increase the risk of falls, causing discomfort and additional tension in their bodies. These irregularities require constant effort to maintain balance, which exacerbates the children's fatigue and pain. Mr. Ramón is forced to make extra efforts to stabilize the convoy and avoid accidents, which increases his physical and emotional exhaustion, while constantly worrying about his children's safety.

80.7. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk at the corner located on Av. José de Diego, Arecibo, PR 00612-0000, at coordinates 18.472879734831263, -66.7129287595799, does not have an access ramp. The



absence of an adequate ramp prevents them from moving smoothly and safely, forcing them to look for alternative routes that are not always accessible or secure. The convoy that V.R.R. and F.R.R. use for mobility requires a level transition to ensure its stability. Without a ramp, they are forced to come to a complete stop and depend on their father's assistance to continue their journey. This lack of accessibility disrupts their movement, reducing their independence and causing frustration, as an obstacle that could have been avoided with proper infrastructure now prevents them from moving freely. For V.R.R. and F.R.R., this barrier not only limits their autonomy but also directly affects their health. Due to the spinal muscular atrophy they suffer from, their bodies are extremely vulnerable to sudden movements and instability. When they have to stop at an inaccessible point and wait to be lifted or manually transported, their posture is compromised, causing them discomfort, pain, and muscle fatigue. Additionally, any improper maneuver to overcome this obstacle puts pressure on their spine or limbs, worsening their condition and causing prolonged discomfort. The lack of an accessible surface imposes an unnecessary physical burden on them, affecting their well-being and limiting their ability to explore their surroundings safely. For Mr. Ramón, this situation represents a considerable physical burden, as he must find a way to help his children navigate an obstacle in an environment that is not adapted to their needs. The absence of a ramp forces him to lift or tilt the convoy manually, which requires significant effort and increases the strain on every trip. Additionally, he feels concerned about the impact it may have on his children's health, as any jolt or poor posture causes them pain or prolonged discomfort.

80.8. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the corner located on Av. José de Diego, Arecibo, PR 00612-0000, at coordinates 18.472232591189158, -66.71630807816108, is in poor condition and lacks a ramp that meets the necessary standards to ensure safe passage. For V.R.R. and F.R.R., who have spinal muscular atrophy and rely on the convoy for mobility, this deficiency represents a critical obstacle. The absence of a proper ramp prevents them from safely ascending or descending the sidewalk, forcing them to seek alternative routes that, in many cases, are neither accessible nor safe. This issue not only complicates their daily mobility but also directly affects their health. Due to their condition, their bodies are extremely sensitive to sudden movements or improper posture. Every time they must stop abruptly or be manually lifted to overcome a barrier, their posture is compromised, causing discomfort, muscle fatigue, or even prolonged pain. For Mr. Ramón, this situation requires considerable physical effort and generates constant emotional strain. The lack of accessible infrastructure forces him to perform exhausting maneuvers to assist his children, such as tilting, lifting, or repositioning the convoy on unstable surfaces. This not only increases his risk of injury but also causes him constant concern for the well-being of V.R.R. and F.R.R. Each attempt to overcome this obstacle is a source of stress, as any sudden movement affects the children's posture, causing them discomfort or unnecessary pain.

80.9. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the ramp at the corner located on Av. José de Diego, Arecibo, PR 00612-0000, at coordinates 18.472101904573996, -66.71629498342756, lacks visible signage, with faded

paint and no clear markings indicating its accessible purpose. This deficiency makes it difficult for drivers and pedestrians to recognize its function, increasing the likelihood of obstructions that directly affect their mobility. For V.R.R. and F.R.R., who have spinal muscular atrophy and rely on a mobility device called a convoy, the lack of clear and safe access presents a significant risk. The convoy requires a smooth, uninterrupted path to function properly, as any obstacle or forced stop causes discomfort and instability. Without proper signage and control measures, vehicles frequently block the ramp, leaving them without a direct passage and forcing them to wait or attempt unsafe maneuvers. Any detour or additional effort places an unnecessary burden on their bodies, which are highly vulnerable to fatigue and discomfort due to their condition. When V.R.R. and F.R.R. must remain stationary for an extended period, their posture is affected, leading to stiffness and muscle tension. The lack of a continuous and stable route causes the convoy to shake or tilt unexpectedly, resulting in pain in their back, neck, and limbs. Their condition makes them particularly sensitive to any vibration or abrupt movement, so these impacts can lead to muscle spasms or increase their feeling of fatigue. Additionally, the constant need to change routes and face additional obstacles prolongs their trips, increasing their exhaustion and reducing their physical endurance. The absence of regulatory signage has allowed the improper use of the ramp, with illegally parked vehicles making it inaccessible. When faced with this obstruction, V.R.R. and F.R.R. are left without a safe route, forcing them to take alternative paths that may not be suitable for their mobility needs. For Mr. Ramón, this situation presents both a physical and

emotional burden. He must constantly assess the environment, find alternative routes, and help his children navigate barriers that should not exist. The recurring need to adjust their journey, lift or reposition the convoy, and ensure their safety adds to his daily stress and physical strain.

- 80.10. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the pedestrian intersection located at Av. José de Diego, Arecibo, PR 00612-0000, at coordinates 18.472232921363773, -66.71630839447174, lacks an access ramp, preventing them from crossing the street safely and independently. Because V.R.R. and F.R.R. suffer from spinal muscular atrophy and rely on a mobility device called a convoy, the absence of an adequate ramp represents a significant barrier to their daily movement. This lack of accessibility forces Mr. Ramón to seek longer alternative routes or expose himself to risks when trying to maneuver over an uneven surface, increasing the difficulty and time of their journeys. Additionally, the sidewalk has cracks, uneven areas, and loose fragments that make it difficult for the convoy to move, compromising its stability and safety. The irregularities in the terrain create sudden movements that cause physical discomfort, muscle fatigue, and pain in the children's back, neck, and limbs. The constant need to adjust their posture to counteract these impacts increases their physical strain and affects their overall well-being. The narrowness of the sidewalk also presents a problem, as it restricts the passage of the convoy and prevents Mr. Ramón from accompanying them comfortably. This forces them to maneuver with difficulty, putting their stability at risk or even having to use the roadway, exposing themselves to vehicular traffic. This situation creates a constant danger.

Additionally, the presence of fences, poles, and signage along the pedestrian path partially blocks circulation, requiring additional effort to navigate these obstacles. In some cases, these elements force them to leave the sidewalk and move through even more unstable or hazardous surfaces. The lack of an accessible and safe route not only increases the physical burden on the children and their father but also affects their independence, limiting their right to move freely without unnecessary risks. For Mr. Ramón, this situation not only involves significant physical effort but also has a profound emotional impact. The constant concern for his children's safety and the need to face inadequate infrastructure daily cause him stress and frustration. Knowing that each journey can become an unpredictable challenge makes him anxious, as any oversight or difficulty along the way could lead to discomfort or even injuries for V.R.R. and F.R.R. Additionally, the inability to provide them with a safe and accessible environment affects his emotional well-being, making him feel obligated to navigate obstacles that should not exist. This emotional burden adds to the physical demands of continuously assisting them, increasing his exhaustion and affecting his quality of life.

- 80.11. To ensure the safe and independent mobility of Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to implement improvements in the pedestrian infrastructure of Av. José de Diego, Arecibo, PR 00612-0000. The installation of accessible ramps at all mentioned intersections is recommended, ensuring they meet proper slopes and accessibility standards. Additionally, it is necessary to repair and level the sidewalk in deteriorated sections, eliminating cracks, uneven

surfaces, and loose fragments that compromise the stability of the convoy, the mobility device used by the children. To improve circulation, sidewalks should be widened at points where their narrowness prevents safe passage, and obstructive elements such as poles, fences, and signage should be relocated or properly marked. It is also suggested to implement clear and visible signage on the ramps, including high-contrast paint and explicit parking prohibitions at these access points to prevent blockages. Furthermore, the creation of safe and accessible pedestrian routes connecting key points of interest in the area is recommended, allowing Mr. Ramón and his children, V.R.R. and F.R.R., to move without risks. With these solutions, Mr. Ramón and his children would be able to use the sidewalks of Av. José de Diego without inconvenience.

81. Mr. Ramón and his children, V.R.R. and F.R.R., wish to use the sidewalks of Bio Street, Arecibo, PR 00612-0000, to access Plaza El Recreo. Their goal is to practice sports such as walking or jogging and enjoy playing with their toys in an open space, as these activities not only strengthen their physical health but also contribute to their emotional well-being. Both Mr. Ramón and his children find in physical activity and play a form of recreation and connection, which allows them to share moments of joy and enjoyment.
82. However, since December 2024, they are aware of architectural barriers that prevent them from using these sidewalks safely. In February and March 2025, they wanted to visit the area, but knowing about these barriers, they felt discouraged and decided not to do so, which has caused them frustration and discouragement. The inability to move freely through this space has limited their right to enjoy their surroundings and has affected their sense of inclusion and autonomy. Despite this, they will go in the next four months

to access Plaza El Recreo without restrictions and fully enjoy the activities they can carry out there, such as playing with their children and walking freely without restrictions. these barriers are:

82.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the lack of a ramp at the corner located on Bio Street, Arecibo, PR 00612-0000, at coordinates 18.472042179529442, -66.71285894427673, which prevents them from moving independently and safely. Since V.R.R. and F.R.R. have spinal muscular atrophy and rely on a mobility device called a convoy, the absence of this ramp represents a significant barrier that forces them to seek alternative routes that are not always accessible or safe, increasing their physical effort and the risk of incidents. Additionally, access to the sidewalk is obstructed by parked vehicles, preventing their passage and, in some cases, forcing them to travel on the street, exposing them to dangerous situations. The convoy requires a continuous and unobstructed path to ensure the children's stability; however, when they are forced to detour or stop due to obstructions, they experience physical discomfort, fatigue, and increased muscle tension, affecting their overall well-being. The narrowness of the sidewalk further worsens the situation, limiting the space needed for the convoy to maneuver. The presence of utility poles significantly reduces the passage area, forcing them to perform uncomfortable maneuvers that can compromise their stability and safety. These difficulties increase the children's fatigue, causing pain in their limbs and back due to the forced and irregular movements they must endure. For Mr. Ramón, these barriers represent a constant challenge that not only affects his children's mobility but also causes him a high

level of stress. The need to constantly assess the surroundings, avoid risks, and assist V.R.R. and F.R.R. at every obstacle results in physical and emotional exhaustion, making him feel powerless as he struggles to provide them with a safe and uninterrupted journey.

82.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located on Bio Street, Arecibo, PR 00612-0000, from coordinates 18.471898891473, -66.71307917192154 to coordinates 18.471672473604215, -66.71390261003438, is narrow and lacks maintenance, making their safe and independent movement difficult. Because V.R.R. and F.R.R. have spinal muscular atrophy and rely on a mobility device called a convoy, the deteriorated conditions of the sidewalk represent a significant obstacle in their daily mobility. The presence of overgrown vegetation, cracks, and uneven surfaces forces the convoy to navigate constant irregularities, generating abrupt movements that increase the risk of instability, muscle fatigue, and physical discomfort for the children. Additionally, poles, traffic signs, and other structures reduce the available space, preventing the convoy from passing without forced maneuvers. In a stretch of approximately 33 meters, the sidewalk is almost entirely covered by vegetation, making it impassable and forcing them to turn back or seek alternative routes that are not always accessible or safe. The lack of a clear path disrupts their autonomy and prolongs their journeys, increasing their physical effort and vulnerability to potential falls or accidents. Furthermore, the absence of ramps along a 70-meter stretch prevents them from safely ascending or descending the sidewalk. Since they depend on the convoy for mobility, V.R.R. and F.R.R. cannot continue their



route without additional assistance, causing frustration and limiting their independence. The constant exposure to these barriers also affects their emotional well-being, as each failed attempt to navigate the area reinforces their sense of exclusion and the difficulty of freely accessing their surroundings. For Mr. Ramón, this situation represents a constant source of stress and exhaustion. The need to overcome obstacles daily, ensure his children's safety, and face an environment that does not allow them to move normally creates a significant emotional burden. The helplessness of not being able to provide them with a safe and accessible path causes him anxiety and frustration, affecting his quality of life and overall well-being.

- 82.3. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the architectural barriers located on Bio Street, Arecibo, PR 00612-0000, from coordinates 18.472116545990204, -66.71289446515041 to coordinates 18.472198590489477, -66.7129373804918. This is a deteriorated sidewalk with cracks and lack of maintenance, featuring a steep drop that makes access difficult. The absence of a ramp and the presence of overgrown weeds and grass further complicate movement in the area. For V.R.R. and F.R.R., who suffer from spinal muscular atrophy and rely on a mobility device called a convoy, this barrier represents the inability to move safely and independently. The lack of accessibility restricts their mobility, forcing them to depend entirely on their father's assistance to overcome the obstacle. The convoy, designed to facilitate their movement, becomes ineffective on such an uneven terrain filled with obstacles, causing constant jolts and abrupt movements that lead to muscle pain, extreme fatigue, and physical

discomfort in the children, affecting their overall well-being. These barriers not only limit their freedom of movement but also pose a constant risk of accidents, preventing their integration and participation in daily activities. Additionally, Mr. Ramón experiences ongoing stress as he struggles to ensure his children's safety in an environment that is not adapted to their needs. The uncertainty and helplessness of not being able to provide them with a safe path increase his emotional burden and affect his mental health, causing constant anxiety and frustration.

- 82.4. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the architectural barriers on the sidewalk located at Bio Street, Arecibo, PR 00612-0000, at coordinates 18.472110821953894, -66.71289178294161. This sidewalk, situated in a high-foot-traffic area, has a pronounced uneven surface that makes safe movement difficult. Additionally, deep cracks and lack of maintenance have caused fragments of pavement to break away, leaving irregular holes. For V.R.R. and F.R.R., who suffer from spinal muscular atrophy and rely on a mobility device called a convoy, these barriers make independent movement nearly impossible. The convoy, designed to facilitate their mobility, cannot maneuver through the potholes, uneven surfaces, and obstacles that obstruct the sidewalk. Each jolt caused by these irregularities results in involuntary movements that increase their muscle fatigue, generate pain, and cause physical discomfort, worsening their condition and limiting their ability to move comfortably. Moreover, there is no proper signage for people with disabilities, nor are there railings or support points in areas with steep inclines. During the rainy season,

poor drainage leads to large puddles accumulating in the most affected sections, making the surface even more slippery and unsafe. In some parts of the sidewalk, poorly placed streetlights and tilted traffic signs obstruct the way, forcing pedestrians to step onto the roadway to continue their journey. These barriers not only restrict their freedom of movement but also expose them to constant dangers, increasing their dependence on their father's assistance. For Mr. Ramón, ensuring his children's safety in such an environment is a daily struggle that generates ongoing stress and emotional exhaustion.

- 82.5. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of multiple architectural barriers located on Bio Street, Arecibo, PR 00612-0000, at coordinates 18.472117764560483, -66.7128955092277, which hinder their mobility and limit their autonomy. The sidewalk is notably narrow, preventing safe and comfortable passage, especially for the children who rely on the Convoy mobility device, as maneuvering becomes complicated, forcing them to stop or constantly divert their path. Adding to this issue is the excessive overgrowth of vegetation, which completely covers a 33-meter stretch of the sidewalk, making it impassable and forcing them to take alternative routes that put their safety at risk. The uneven surface is another significant obstacle, with deep cracks and overgrown grass creating instability and increasing the risk of the Convoy getting stuck or losing balance, making the journey uncomfortable, exhausting, and stressful. Additionally, the presence of poles, traffic signs, and other obstructions further reduces the available space, blocking their path or requiring complex maneuvers that affect their independence. The absence of accessible ramps over a

70-meter stretch disrupts their route, forcing them to rely on external assistance to overcome level changes, reinforcing the feeling that the environment is not adapted to their needs and limiting their right to move safely and independently. The lack of control measures allows the ramp to be improperly occupied by illegally parked vehicles, leaving the children without an accessible and safe route, forcing them to seek alternative paths that may not be suited to their needs. Any interruption in their journey presents a physical challenge, as they cannot easily overcome obstacles and require a stable and continuous surface to avoid complications in their mobility. For V.R.R. and F.R.R., who suffer from spinal muscular atrophy, these barriers not only make mobility difficult but also cause muscle fatigue, pain, and physical discomfort due to the constant jolts they have to endure. The inability to move freely without interruptions and the ongoing need for assistance impact their emotional well-being, increasing their frustration and sense of exclusion. For Mr. Ramón, this situation represents a significant emotional burden, as he must face an environment daily that does not provide the necessary conditions for his children's mobility. The constant concern for their safety and the frustration of not being able to offer them an accessible and obstacle-free path generate ongoing stress that negatively affects his well-being and quality of life.

- 82.6. To address the architectural barriers on Bio Street, Arecibo, PR 00612-0000, it is essential to implement a comprehensive accessibility plan that includes widening and proper maintenance of sidewalks, ensuring leveled and crack-free surfaces, as well as regular trimming of overgrown vegetation obstructing the path. The

installation of accessible ramps in areas where they are currently missing would allow children V.R.R. and F.R.R. to move safely and independently with their Convoy device. Additionally, poles, traffic signs, and other obstacles that reduce available space should be relocated or adjusted to guarantee a minimum width suitable for assisted mobility. Improving drainage is also crucial to prevent water accumulation that hinders movement during the rainy season, along with establishing clear signage for people with disabilities. Lastly, strict regulations and control measures are needed to prevent illegal vehicle parking on ramps and pedestrian access points, ensuring that pathways remain accessible at all times. This way, Mr. Ramón and his children will be able to navigate these sidewalks to visit the places they wish to explore.

83. Mr. Ramón and his children, V.R.R. and F.R.R., wish to access the sidewalks located at 514 Av. Miramar, Arecibo, PR 00612-0000, as Mr. Ramón wants to visit Ferretería Miramar, known for offering products that are hard to find in other hardware stores, including solar panel lighting, welding equipment and machines, bathroom fixtures, carpentry tools, and excellent customer service, with very good prices. As is well known, due to his children's physical condition, Mr. Ramón must always be accompanied by them. Additionally, he is also interested in visiting Josué Refrigeration, a store specializing in spare parts for appliance repairs, as they offer comprehensive solutions for the repair and maintenance of household appliances and handle high-quality spare parts.
84. However, since January 2025, he has been aware of the architectural barriers that make access difficult. In February and March, he wanted to go but felt discouraged because there is no safe access, violating the rights of both him and his children, and making them

feel excluded. Despite this, he will go with his children in three months to obtain the services offered by these businesses and enjoy their customer service and good prices.

The barriers are:

- 84.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk located at 514 Av. Miramar, Arecibo, PR 00612-0000, at coordinates 18.472186910358108, -66.73011425773615, which they need to use, has a highly uneven surface, with cracks and potholes disrupting their path. The deterioration of the pavement creates sudden level changes that make it impossible for a person with limited mobility to pass, turning an accessible route into an unstable and hazardous environment. For V.R.R. and F.R.R., who rely on a mobility device, these defects present a significant barrier, as every irregularity in the ground affects their stability and makes movement uncomfortable and exhausting. Mr. Ramón, who assists them in their daily mobility, is also aware of the additional challenges he faces while trying to guide them over such deteriorated terrain. The lack of a smooth and continuous path forces him to constantly seek alternatives, increasing his physical and mental strain. The absence of proper sidewalk maintenance not only limits their ability to move safely but also heightens his concerns and makes each trip even more difficult.
- 84.2. The passage on the sidewalk located at 514 Av. Miramar, Arecibo, PR 00612-0000, at coordinates 18.472186910358108, -66.73011425773615 is obstructed by illegally parked vehicles, preventing free movement and creating a physical barrier that restricts their mobility. The presence of these cars blocks their path, forcing them to take alternative routes that may be longer,

uncomfortable, or even dangerous. For V.R.R. and F.R.R., who require a clear path to move safely, the illegal occupation of the sidewalk represents a constant challenge. The need to maneuver around parked vehicles increases their physical effort and creates additional discomfort and uncertainty. The lack of an accessible route frequently forces them to modify their trajectory abruptly, which puts their stability at risk. Mr. Ramón, who accompanies and assists them on their journeys, also experiences the impact of this situation. The difficulty of finding a safe and unobstructed path worsens his exhaustion and concern.

- 84.3. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the ramp located at 514 Av. Miramar, Arecibo, PR 00612-0000, at coordinates 18.47217570510977, -66.73171841124922, is in poor condition. Its worn-out surface and lack of paint reduce its visibility and compromise safety when in use. These conditions affect its functionality and create uncertainty with each attempt to navigate it. For V.R.R. and F.R.R., who depend on accessible infrastructure for comfortable movement, the deteriorated state of the ramp poses a serious problem. The current conditions increase the risk of slipping or difficulties in maneuvering, requiring additional effort to maintain stability. Instead of facilitating their mobility, the ramp has become a barrier that adds unnecessary complications to their route. Mr. Ramón, who is responsible for assisting them in their daily mobility, also is aware of the challenges of poorly maintained infrastructure. The lack of proper upkeep forces him to exert extra effort to ensure his children's safety while using the ramp. Its deterioration and lack of proper signage undermine confidence and security.

84.4. To ensure safe and accessible mobility for Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to address the current obstacles that hinder their movement. The uneven sidewalk surface must be fully repaired, eliminating cracks, potholes, and level changes that make the path unstable. The pavement should be restored with durable, non-slip materials to provide a smooth and continuous route that allows for effortless navigation. Additionally, regular maintenance should be implemented to prevent future deterioration and ensure the sidewalk remains in optimal condition over time. Furthermore, measures must be taken to prevent illegal parking on the sidewalk, as it creates unnecessary barriers that obstruct movement. Installing proper signage and physical deterrents, such as bollards or designated pedestrian spaces, would help ensure the sidewalk remains clear for its intended use. Strict enforcement and penalties for unauthorized parking would also be crucial in maintaining accessibility and preventing Mr. Ramón and his children from facing additional challenges in their daily commutes. The ramp, must also be properly restored. The worn-out surface should be refinished to ensure stability and safety, and fresh paint should be applied to improve visibility. These modifications would enhance the ramp's functionality, making it a reliable access point for V.R.R. and F.R.R. to move with ease and security. By implementing these solutions, V.R.R. and F.R.R. would regain the ability to travel independently and safely, without the fear of unstable surfaces or obstructed pathways. Mr. Ramón would also experience significant relief, as he would no longer have to struggle with unsafe conditions while assisting his children. These improvements would not only eliminate unnecessary



risks but also enhance their quality of life by providing a secure and accessible environment for their daily mobility.

85. Mr. Ramón and his children, V.R.R. and F.R.R., wish to travel along the sidewalk located on Puerto Rico Highway 2, Arecibo, PR 00612-0000. This route allows them to access several nearby establishments, such as Martin's BBQ, known for selling the best chicken in Arecibo, a place they have wanted to visit based on the reviews they have seen, as they claim the chicken is juicy, tender, and has an unmatched flavor. Additionally, there is My Sweet Bakery, a place they wish to visit personally to try their delicious egg sandwiches for breakfast, which, according to the photos they've seen, look appetizing and perfect to start the day. The combination of crispy bread, fresh eggs, and their special touch has greatly tempted them.
86. Since December 2024, they have been aware of the architectural barriers that make safe passage difficult. They wanted to go in January and February 2025, but they felt discouraged by these barriers, the lack of accessibility has created a sense of disappointment and frustration, restricting their ability to navigate freely and diminishing their sense of participation in the community. Despite this, they will go to in four months to enjoy these delicious dishes and experience everything these places have to offer, savoring the egg sandwiches for breakfast and the famous chicken recommended by everyone. The architectural barriers are:
  - 86.1. Mr. Ramón and his children are aware that the sidewalk in this area, located on Puerto Rico Highway 2, Arecibo, PR 00612-0000, from coordinates 18.46705504156216, -66.71826364687824 to coordinates 18.46709320292354, -66.71831125608112, has a deteriorated surface with multiple cracks and evident

signs of lack of maintenance. These conditions affect the stability of the route, creating insecurity for both the children, V.R.R. and F.R.R., and Mr. Ramón. V.R.R. and F.R.R. have spinal muscular atrophy, a condition that progressively weakens their muscles, making any involuntary movement or jolt increase their fatigue and pain. The presence of fissures and pavement wear makes it difficult for them to move using their Convoy device, forcing them to make constant maneuvers that cause jolts, directly affecting their stability and causing physical discomfort. Each impact with a crack or uneven surface worsens their muscle fatigue and causes additional discomfort, increasing the risk of falls and accidents. Mr. Ramón must exert constant physical effort to guide them through this uneven terrain, which not only increases his exhaustion but also limits his ability to provide them with proper assistance. The lack of a smooth and accessible surface turns every journey into a challenge, affecting both the children's well-being and Mr. Ramón's safety and peace of mind.

- 86.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk in this area, located on Puerto Rico Highway 2, Arecibo, PR 00612-0000, at coordinates 18.46708707691952, -66.71832315641116, presents multiple architectural barriers that directly impact their mobility and safety. One of the main obstacles is the lack of an accessible ramp, making it impossible for V.R.R. and F.R.R. to move safely alongside Mr. Ramón. This absence of infrastructure forces them to seek alternative routes that are not always accessible or safe, increasing their physical effort and exposing them to potential risks. Additionally, the need to overcome level changes without a proper transition creates instability in their

mobility, putting their safety at risk and limiting their autonomy. V.R.R. and F.R.R. suffer from spinal muscular atrophy, a condition that progressively weakens their muscles, making any involuntary movement or jolt increase their fatigue and pain. The deteriorated sidewalk surface, with multiple cracks and evident signs of lack of maintenance, further complicates their mobility with the Convoy device. This forces them to make constant maneuvers that cause jolts, directly affecting their stability and causing physical discomfort. Each impact with a crack or uneven surface worsens their muscle fatigue, causes additional pain, and increases the risk of falls and accidents. Mr. Ramón, in turn, must exert continuous physical effort to guide them through this uneven terrain, which not only increases his exhaustion but also limits his ability to provide them with adequate assistance. The lack of a smooth and accessible surface turns each journey into a challenge, affecting both the children's well-being and Mr. Ramón's safety and peace of mind.

- 86.3. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the deteriorated condition of the sidewalk located on Puerto Rico Highway 2, Arecibo, PR 00612-0000, from coordinates 18.467640149790963, -66.71880597203683 to coordinates 18.467693575514687, -66.71886498063125, in front of Martin's BBQ. The presence of potholes, cracks, and an evident state of neglect makes passage difficult, turning what should be an accessible space into a hazardous route. For V.R.R. and F.R.R., any uneven surface or instability poses a significant risk, as their condition, spinal muscular atrophy, makes them particularly vulnerable to sudden movements. Every irregularity in the path affects their

stability, causes discomfort, and increases their physical strain, making them more prone to accidents. For their father, Mr. Ramón, this is a constant concern and an additional burden, as he must ensure their safety while assisting them in every movement, increasing both his physical and emotional strain. In several areas, overgrown vegetation partially covers the sidewalk, further reducing the available space and creating an uneven path. This makes mobility even more difficult for V.R.R. and F.R.R., who require a clear and stable route for safe travel. Additionally, Mr. Ramón must remain constantly alert, searching for alternative routes or maneuvering around these obstacles, which prolongs each trip and adds to everyone's fatigue. The presence of traffic signs and poles positioned in the middle of the path creates yet another barrier, further restricting their movement. For V.R.R. and F.R.R., this means relying entirely on their father to navigate around these obstacles, further limiting their independence. The current state of the sidewalk not only prevents their free movement but also has an emotional impact. The feeling of being excluded from an environment that should be accessible causes frustration and limits their right to move with dignity and safety.

86.4. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the severe deterioration of the sidewalk located on Puerto Rico Highway 2, Arecibo, PR 00612-0000, from coordinates 18.467121089840163, -66.71817468400894 to coordinates 18.467208338573595, -66.71828373897222, in front of Farmacia del Carmen. The surface is in critical condition, with cracks, potholes, and deep depressions, largely caused by structural damage to the sewer system. The children, V.R.R. and F.R.R., suffer from spinal muscular atrophy, a condition that

progressively weakens their muscles and makes any sudden movement or jolt increase their fatigue and pain. The irregularities of the sidewalk directly affect the stability of the convoy they use for mobility, causing intense jolts and abrupt stops that not only hinder their movement but also cause them physical discomfort and additional strain. For Mr. Ramón, traveling through this section requires constant vigilance and extra physical effort to prevent interruptions or accidents that could compromise his children's safety. The presence of overgrown vegetation in several areas further worsens the situation, partially covering the surface and reducing visibility of obstacles. This forces the family to make unexpected maneuvers that compromise the stability of the convoy, increasing the risk of falls or injuries. Additionally, Mr. Ramón must remove branches or seek alternative routes, which adds difficulty to his role as a caregiver and prolongs each trip, increasing his exhaustion. Although the sidewalk has a standard width, the presence of planters significantly reduces the available space, making pedestrian transit more difficult. For the children, this means a limitation in their maneuverability, forcing them to stop or veer into unsafe areas. For Mr. Ramón, the lack of adequate space restricts his ability to assist them, increasing his physical and emotional burden.

- 86.5. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the severe deterioration of the sidewalk located on Puerto Rico Highway 2, Arecibo, PR 00612-0000, from coordinates 18.467225966719752, -66.71825938056978. The lack of signage at the corner and the advanced state of neglect of the sidewalk further worsen the situation. The pavement has deep cracks, is overgrown with

weeds, and shows structural damage that makes safe passage difficult. These conditions not only obstruct their path but also force them to seek alternative routes that, in many cases, are unsafe and dangerous. For V.R.R. and F.R.R., any irregularity in the terrain increases pain, extreme fatigue, and complications associated with their spinal muscular atrophy. The constant impacts and sudden jolts caused by the damaged surface can trigger muscle spasms, increase stiffness in their limbs, and worsen their physical discomfort. Additionally, the instability of the terrain generates stress and anxiety for both the children and Mr. Ramón, who must take extreme precautions to prevent falls or movements that could affect his children's posture and well-being. The lack of accessible infrastructure not only restricts their mobility but also subjects them to an unnecessary physical and emotional burden. This structural barrier not only compromises their safety and independence but also impacts their quality of life, limiting their right to move with dignity, autonomy, and without avoidable risks.

- 86.6. To ensure the safe and independent mobility of Mr. Ramón and his children, V.R.R. and F.R.R., it is necessary to implement improvements to the sidewalk infrastructure on Puerto Rico Highway 2, Arecibo, PR 00612-0000. The immediate repair of deteriorated surfaces is recommended, filling cracks, potholes, and depressions to provide a stable and even path. Additionally, the installation of accessible ramps at critical points would facilitate uninterrupted transit, ensuring a smooth transition over uneven surfaces. Regular maintenance of the area is essential, including trimming invasive vegetation to keep the path clear. The relocation or removal of obstacles such as poles and traffic signs that

reduce pedestrian space would further enhance accessibility. Likewise, the implementation of clear and visible signage at intersections would improve safety and guidance for pedestrians with reduced mobility. Finally, widening the sidewalk in narrow areas and ensuring sufficient space would allow the convoy to move comfortably, minimizing physical strain and the risk of accidents. With these solutions, a more inclusive environment would be guaranteed for Mr. Ramón and his children, allowing them to navigate these areas without difficulty.

87. Mr. Ramón and his children, V.R.R. and F.R.R., wish to walk along the sidewalk of Av. Santiago Iglesias Pantín, in Arecibo, PR 00612, to visit the Savanna restaurant, a highly recommended place where they want to try dishes such as rice with langoustines and their milkshakes. For them, exploring new places is not only a way to break their routine but also to improve their well-being. Additionally, they seek access to pharmacies such as Farmacia Marilú, where prices are more affordable compared to other pharmacies.
88. However, since January 2025, they are aware architectural barriers that hinder their safe mobility. In February and March 2025, they attempted to visit but felt discouraged by the obstacles along the way, as a result, they have experienced frustration and a sense of exclusion, as the inability to move independently through the space has limited their ability to enjoy the city and impacted their sense of inclusion. . Despite this, they will go in four months to finally try the delicious rice and access the products and the pharmacy with its more favorable offerings. The barriers are:
  - 88.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the poor condition of the sidewalk at the corner located on Av. Santiago Iglesias Pantín, Arecibo, PR 00612-0000 at coordinates 18.47112487582255, -66.71673579287533. They

know that the corner lacks a ramp despite the existing level difference, preventing smooth and safe access to the sidewalk. This absence forces the children, who use a convoy for mobility, to face obstacles that hinder their movement, causing delays and unnecessary effort that affects their autonomy and safety. The ground has significant irregularities, including cracks and uneven surfaces that impact the stability of the path. These conditions make it difficult for the children's convoy to move forward without interruptions, increasing the risk of sudden movements or unexpected blockages that compromise their safety. For Mr. Ramón, these difficulties represent an additional burden of stress and constant concern. He must remain alert at all times to prevent his children from experiencing jolts or dangerous situations, which increases his level of anxiety and fatigue. The lack of adequate access forces him to perform complicated maneuvers and seek alternative routes, prolonging each journey and increasing his physical and mental exhaustion. Additionally, the accumulation of overgrown vegetation and the presence of various elements in the area, such as poles and other objects placed without planning, reduce the available circulation space. This limits the convoy's passage and forces difficult maneuvers that hinder Mr. Ramón's transit with his children, exposing them to unnecessary risks due to the lack of a clear and accessible path. This situation not only affects the family's mobility but also impacts their emotional well-being.

- 88.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the conditions of the sidewalk in this area, located on Av. Santiago Iglesias Pantín, Arecibo, PR 00612-0000, at coordinates 18.469873449848738, -66.71641276951424. The



architectural barriers at the corner of this sidewalk include the absence of an access ramp, making safe passage impossible for V.R.R. and F.R.R., who, due to spinal muscular atrophy, rely on their Convoy device for mobility. Additionally, the lack of maintenance is evident in the presence of cracks and a deteriorated pavement, posing a significant risk of instability and potential falls for the children. The absence of proper signage further exacerbates the situation, as it fails to alert pedestrians and drivers to the need for an accessible crossing. For Mr. Ramón, these conditions not only make his role as a caregiver more challenging, requiring additional physical effort to maneuver through unsuitable terrain, but also impose a constant emotional burden as he faces daily uncertainty and fear for his children's safety.

- 88.3. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that in several sections located on Av. Santiago Iglesias Pantín, Arecibo, PR 00612-0000, at coordinates 18.469901281219187, -66.71646780130241, the sidewalk is practically nonexistent due to severe deterioration, with large cracks and destroyed sections. This forces them to seek alternative routes, exposing them to dangerous situations. The lack of a safe and continuous surface makes mobility difficult, generating stress and frustration as they are unable to walk comfortably through the area. Additionally, the extra effort required to navigate these damaged sections places a physical and emotional burden on Mr. Ramón, who must ensure his children's safety under these adverse conditions. Likewise, the absence of access ramps at crossings and the lack of proper signage further restrict the family's mobility. Without ramps, elevation changes on the sidewalk become difficult

obstacles to overcome, preventing smooth and safe movement. The lack of signage worsens the issue, as there are no warnings for other pedestrians or drivers about the need to maintain an accessible passage. This situation creates a constant sense of insecurity and concern for Mr. Ramón, who faces increasing difficulties while walking with his children. Additionally, the sidewalk is covered with overgrown vegetation and weeds, significantly reducing the available space for walking. These conditions not only make movement difficult but also pose a risk, as the uneven ground hidden by vegetation causes trips or accidents. For the children, this barrier limits their ability to move freely, while for Mr. Ramón, it presents a constant challenge, as he must clear the path or find unsafe alternatives to continue their journey.

- 88.4. To ensure the safe and autonomous mobility of Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to improve pedestrian infrastructure on Av. Santiago Iglesias Pantín, Arecibo, PR 00612-0000, by constructing and installing access ramps at corners with elevation changes, repairing and maintaining the sidewalk to eliminate cracks and uneven surfaces, and expanding the circulation space in areas where the sidewalk is either nonexistent or too narrow. Additionally, overgrown vegetation should be trimmed, obstacles such as poles and improperly placed signage should be relocated, and clear signage should be implemented to alert drivers and pedestrians about the need to maintain an accessible path. These improvements will enable safe and continuous transit, reducing Mr. Ramón's physical effort and providing greater stability and autonomy for his children, ensuring an inclusive and barrier-free environment.

89. Mr. Ramón and his children, V.R.R. and F.R.R., wish to walk along the sidewalk on Av. Juan Rosado, Arecibo, PR 00612-0000, to visit the Casellas ice plant, which is located nearby. They are interested in learning about its services since Mr. Ramón wants to prepare frappés at home for his children and is aware of the quality of the company's products, such as its affordable prices, packaging quality, high sanitation standards, and good customer service, qualities that are hard to find.
90. However, since January 2025, they have been aware of the architectural barriers affecting this sidewalk. In February and March, they attempted to visit but felt discouraged due to the lack of a safe passage, which goes against their right to move freely and excludes them. Despite this, they will go in three months to purchase their products and enjoy a delicious frappé together. These are the barriers they face:
- 90.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the deterioration of the sidewalk on Av. Juan Rosado, Arecibo, PR 00612-0000, specifically in the section between coordinates 18.467365399889445, -66.71818281619913 and 18.467475431596917, -66.71804736464898, in front of Gulf. The corner of the sidewalk has practically disappeared in some sections, making safe passage impossible. The lack of signage worsens the situation, as neither pedestrians nor drivers receive warnings about the accessibility risks in the area. This omission endangers V.R.R. and F.R.R., who suffer from spinal muscular atrophy and rely on their convoy for mobility. Any irregularity in the ground represents an immediate barrier, causing unexpected blockages or sudden movements that compromise the stability of the device. The present damage to the sidewalk prevents the children from moving safely, affecting their physical well-being. For

Mr. Ramón, the situation not only imposes a constant effort to overcome obstacles but also causes him ongoing concern, as he cannot ensure that his children move without danger or interruptions.

90.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the sidewalk located on Av. Juan Rosado, Arecibo, PR 00612-0000, with coordinates 18.46737254864544, -66.71811361089037, is in an advanced state of deterioration, with broken fragments, uneven surfaces, and worn-out pavement. These conditions directly affect V.R.R. and F.R.R., who suffer from spinal muscular atrophy and rely on their convoy for mobility. Any irregularity in the ground represents an immediate barrier, preventing their safe movement. The sidewalk has no visible signs indicating its beginning and end, which further hinders the children's mobility. The lack of a clear route creates insecurity, as they cannot rely on a stable and continuous path to move safely. The cracks, uneven surfaces, potholes, and deep craters turn their route into a constant obstacle. Every irregularity in the pavement causes the convoy to wobble and stop abruptly, generating additional physical strain that affects the children with muscle pain. Mr. Ramón faces a daily struggle to maneuver the convoy under these conditions, increasing his concern and making his children's safe mobility more difficult.

90.3. To ensure the safety and accessibility of Mr. Ramón and his children, V.R.R. and F.R.R., the immediate rehabilitation of the sidewalk on Av. Juan Rosado, Arecibo, PR 00612-0000, is essential. This includes repairing and reconstructing the deteriorated sections, installing a properly leveled ramp, and implementing visible signage to alert pedestrians and drivers about the need for accessibility.

Additionally, any obstacles reducing the circulation space, such as cracks, potholes, and uneven surfaces, should be removed to ensure a stable and continuous path for the children's convoy. These improvements will not only facilitate the family's safe movement, reducing the risk of accidents and unnecessary effort, but also promote the inclusion and independent mobility of people with disabilities, fostering a more accessible and equitable urban environment.

91. Mr. Ramón and his children enjoy exploring different restaurants and strolling through various avenues as a way to relax and experience new things. Recently, they were recommended to visit Esquina del Frappe y Açaí, a restaurant famous for the unique texture, sweetness, and flavor of its frappés, which sparked their great interest in trying them. Additionally, they wish to see the Indio Taíno mural, as they find art and culture deeply entertaining and have a strong affinity for history.
92. For these reasons, they want to use the sidewalk located on M. Perez Freytes street, Arecibo, PR 00612-0000. However, since December 2024, they have identified architectural barriers that make it difficult to walk safely and without obstacles. Despite this, they attempted to go in January and February 2025 but felt discouraged due to these same barriers. This situation has sparked feelings of frustration and discouragement, as the obstacles to mobility have prevented them from fully accessing the city and have affected their sense of being part of the community. They will go in three months to finally enjoy the delicious frappés they were recommended and, at the same time, visit the mural, connecting with the history and cultural richness of the place. The barriers:

92.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that in several sections, the sidewalk located on M. Pérez Freytes Street, Arecibo, PR 00612-0000, from coordinates 18.47085760272828, -66.72101214820607 to coordinates 18.470899579296727, -66.72082372303531, is practically destroyed, posing a constant danger to the children, V.R.R. and F.R.R., who have spinal muscular atrophy and rely on their Convoy device for mobility. The lack of a proper path forces them to move dangerously close to vehicles, exposing them to high-risk situations that continuously compromise their safety. The deteriorated ground, with deep cracks and uneven surfaces, prevents the Convoy from moving steadily, causing sudden blockages and abrupt movements that directly impact the children's mobility, leading to discomfort and exhaustion. Overgrown vegetation further reduces the available space, obstructing passage and turning the area into an impassable environment for V.R.R. and F.R.R. Their mobility device cannot advance smoothly, preventing them from moving freely and creating constant physical challenges. This lack of infrastructure also places an emotional and physical burden on their father, Mr. Ramón, who experiences ongoing stress and frustration due to his inability to ensure his children's safety and well-being. Additionally, the sidewalk is extremely narrow and obstructed by poles that completely block the path, making it impossible for V.R.R. and F.R.R. to pass with their Convoy without being forced to seek unsafe or impassable routes. The children's mobility is severely affected, as any journey becomes a challenge requiring significant physical effort and posing a permanent risk of accidents. For Mr. Ramón, this situation forces him to perform exhausting and dangerous

maneuvers, increasing his concern and making it even more difficult to assist his children in an environment that fails to provide even minimal accessibility and safety conditions.

92.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that, in several sections, the sidewalk located on M. Pérez Freytes Street, Arecibo, PR 00612-0000, at coordinates 18.470901639310725, -66.72082100120997, presents serious difficulties. The absence of access ramps at street crossings and the lack of proper signage further restrict their mobility. Without ramps, elevation changes make it difficult for them to move smoothly and safely, forcing them to stop and make abrupt maneuvers that cause discomfort and pain. Additionally, the lack of appropriate signage fails to alert other pedestrians and drivers about the need for accessibility, increasing the risk of accidents and creating an environment where their mobility is constantly compromised. Overgrown vegetation further reduces the already narrow sidewalk, making it nearly impassable for Mr. Ramón and his children. The uneven surface caused by grass and weeds creates additional obstacles that hinder their movement, making it unsafe and uncomfortable. For V.R.R. and F.R.R., this means added difficulty in moving safely, while for Mr. Ramón, it represents a constant challenge, as he must clear the way or find alternative routes, further increasing the time and physical effort required for each trip. The lack of a clear and accessible pathway limits their ability to navigate their community safely and comfortably, turning a simple walk into a stressful and exhausting task. Additionally, Mr. Ramón experiences stress and anxiety as he faces all these obstacles.

- 92.3. To ensure safe and accessible passage for Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to reconstruct the sidewalk, providing a continuous, stable surface free of cracks and uneven areas that could hinder their mobility. Additionally, the sidewalk should be widened to allow adequate space for V.R.R. and F.R.R.'s mobility device, while also removing any poles or obstacles that obstruct the path. The installation of access ramps is necessary to facilitate smooth transitions between the sidewalk and different levels, reducing the risk of falls and excessive strain. Furthermore, the implementation of proper signage would alert both pedestrians and drivers to the need to keep the pathway clear and ensure safe passage. Finally, regular maintenance of the sidewalk, including trimming overgrown vegetation and grass, would prevent uneven surfaces that could pose hazards to the family's mobility.
93. Mr. Ramón and his children, V.R.R. and F.R.R., wish to walk along the sidewalk located on Betances Street, Arecibo, PR 00612-0000, between coordinates 18.47185712591924, -66.71648115285016 and 18.471800399529982, -66.7167252367382, in front of Café Tinto. This is because Mr. Ramón promised his children a visit to Rex Cream Arecibo, as they are aware that a delicious corn ice cream is sold there, which is handcrafted at the establishment itself. This place sparked great enthusiasm in them to try it, and they are very excited about visiting the place.
94. However, since January 2025, they are aware of the architectural barriers on this sidewalk that hinder the mobility of V.R.R. and F.R.R., who rely on a mobility device. Despite their desire to visit in February and March 2025, these conditions have discouraged them from using the sidewalk, as it does not provide a safe and comfortable passage, the



barriers they face have caused a sense of disappointment and frustration, as their inability to move through the space freely has restricted their enjoyment of the city and impacted their feeling of inclusion. Nevertheless, they will go in four months to finally taste and enjoy the corn ice cream. The barriers are:

94.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the deteriorated condition of the sidewalk they need to use. Deep cracks and potholes have turned the surface into an uneven and hazardous terrain, severely affecting their mobility. For V.R.R. and F.R.R., who have spinal muscular atrophy and rely on their Convoy device for mobility, these irregularities not only make movement more challenging but also cause discomfort, fatigue, and a constant risk of blockages or sudden jolts that could compromise their safety. Each trip becomes an exhausting challenge, as the lack of a smooth surface prevents the Convoy from moving forward without difficulty. The absence of proper maintenance and necessary repairs further worsens the situation, restricting their right to safe and unobstructed mobility. For Mr. Ramón, these conditions are not just a physical obstacle but also a significant emotional burden. The constant concern for his children's safety and the extra effort required to navigate the hazards of the sidewalk cause him high levels of stress and exhaustion. Every outing demands careful planning and extreme vigilance to avoid accidents, turning a simple daily activity into a distressing experience.

94.2. To ensure safe and unobstructed mobility for Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to carry out a complete restoration of the sidewalk and implement measures to prevent its improper use. Pavement repairs should include

eliminating cracks, potholes, and uneven surfaces, ensuring a smooth and stable path that allows for safe movement without unnecessary strain. Using durable, non-slip materials would also help prevent long-term deterioration and reduce the risk of accidents. Additionally, strict enforcement measures must be established to prevent the sidewalk from being illegally used as a parking area. Installing clear signage and appropriate physical barriers would stop vehicles from blocking the path, ensuring that the space remains accessible for pedestrians. Regular inspections and penalties for unauthorized parking would further help maintain sidewalk accessibility and prevent Mr. Ramón and his children from facing unnecessary obstacles in their daily commute. With these improvements, V.R.R. and F.R.R. would be able to move more safely and comfortably, reducing the fatigue and effort currently required due to the inadequate sidewalk conditions. Likewise, Mr. Ramón would experience significant relief by no longer having to constantly navigate a deteriorated or obstructed environment, allowing him to accompany his children with greater ease and security.

95. Mr. Ramón and his children, V.R.R. and F.R.R., wish to walk along the sidewalk located on González Ginorio Street, Arecibo, PR 00612-0000, between coordinates 18.473286994132568, -66.71279263256413 and 18.47322951263654, -66.71309804651459. Their main motivation is to enjoy a walk while admiring the sea and visiting places of interest that are part of Arecibo's history and culture. The San Miguel Arcángel Powder Magazine fascinates them due to its historical significance. This old masonry building in Arecibo, Puerto Rico, was built at the end of the 18th century. It was used to store gunpowder and ammunition in case of enemy attacks. This history

greatly sparks their interest in learning more about it. Likewise, the Lincoln Basketball Court has caught their attention because, from what they have seen, it looks like a beautiful place, and they want to visit it in person. These outings give them a sense of tranquility and help them break their routine.

96. However, since January 2025, they have been aware of the architectural barriers in the area. Even so, they attempted to visit in February and March 2025 but were discouraged due to the lack of safety for their mobility. Nevertheless, they will go in three months to enjoy the historical site and personally see what they consider the most beautiful basketball court in Arecibo. The existing barriers are:

- 96.1. Mr. Ramón and his children are aware that the sidewalk is in poor condition. The deteriorated infrastructure, with broken or nonexistent sections, poses a constant danger to Mr. Ramón's children, V.R.R. and F.R.R. Their mobility device is affected by sudden uneven surfaces, which can cause unexpected blockages or unstable movements that compromise their safety. For Mr. Ramón, this means increased difficulty on every journey, as he must constantly exert effort to navigate obstacles without endangering his children. This deterioration contradicts accessibility standards, which require firm and continuous surfaces to ensure safe passage.
- 96.2. The uncontrolled growth of vegetation on the sidewalk further reduces the available space for movement, making it difficult for V.R.R. and F.R.R. to pass through. Branches and grass encroach on the path, forcing them to detour or make uncomfortable maneuvers that affect their comfort and safety, causing them pain due to their condition. For Mr. Ramón, this is a constant problem, as he must

manually clear the path or find alternative routes, which prolongs travel time and increases his physical effort. The lack of vegetation maintenance not only fails to meet urban standards but also creates a hostile environment for his children, V.R.R. and F.R.R.

- 96.3. Deep cracks and uneven surfaces on the sidewalk make it difficult for V.R.R. and F.R.R.'s Convoy mobility device to move, causing sudden jolts or blockages that compromise its stability. These imperfections generate discomfort, pain, and affect the safety of their journey. For Mr. Ramón, this means constant tension, as he must stay vigilant for every irregularity in the pavement to prevent possible falls or injuries to his children. The presence of cracks and uneven surfaces violates accessibility requirements, which demand smooth and stable surfaces for the safe passage of people with reduced mobility.
- 96.4. The absence of signs warning about the presence of people with reduced mobility worsens the danger on public roads and directly puts V.R.R. and F.R.R. at risk, as they suffer from spinal muscular atrophy and rely on their Convoy device for mobility. Without proper signage, drivers and pedestrians are unaware of the need to keep the path clear, increasing the likelihood of unexpected blockages and hazardous situations. For V.R.R. and F.R.R., these obstacles not only hinder their mobility but also create additional physical strain that intensifies their fatigue and discomfort, affecting their overall well-being. Sudden jolts or blockages cause them pain and discomfort, exacerbating the challenges they already face due to their condition. For Mr. Ramón, the lack of signage is a constant concern, as he must remain alert at all times to prevent his children from suffering accidents or

injuries. This infrastructure deficiency violates accessibility standards, which require clear information to ensure safety and the right to dignified mobility for all individuals, especially those with disabilities.

- 96.5. To ensure the safety and mobility of Mr. Ramón and his children, V.R.R. and F.R.R., it is essential to improve the sidewalk infrastructure. First, access ramps must be built at street crossings to facilitate smooth transitions and prevent abrupt maneuvers that could cause discomfort or accidents. Additionally, the sidewalk must be widened to meet accessibility standards, allowing the mobility device to pass safely without forcing them to move onto the roadway. Repairing the damaged and cracked sections is crucial to providing a stable and continuous surface, reducing the risk of unexpected blockages or unsafe movements. Furthermore, a regular maintenance program should be implemented, including debris removal and vegetation trimming, ensuring an obstacle-free path. Proper signage installation will alert drivers and pedestrians to the presence of individuals with reduced mobility, promoting respect for safe access and preventing unexpected obstructions. With these measures in place, Mr. Ramón and his children will be able to use the sidewalk without risks, enjoying their walks peacefully and without limitations.
97. Mr. Ramón and his children, V.R.R. and F.R.R., wish to use the sidewalk located on Palma Street, Arecibo, PR 00612-0000, at coordinates 18.47369028987566, -66.71665420984951. This route is convenient for them, as it provides easy access to several establishments they want to visit, one of which is the Marshalls store, where they find a variety of products such as children's toys and clothing from different brands. They

also know that the store offers excellent customer service and high-quality products, which increases their enthusiasm to visit and make the purchases they need.

98. However, since January 2025, they have been aware of the architectural barriers that hinder their mobility. Despite this, they wanted to go in February and March 2025, but they were discouraged by these barriers. Nevertheless, they will go in four months to acquire the store's products and buy toys for the children. The barriers are:

- 98.1. Mr. Ramón and his children are aware that the lack of an accessible and safe ramp represents a significant obstacle to mobility. The current ramp lacks proper signage, making it difficult for people with reduced mobility to identify. Additionally, its incorrect incline makes ascending and descending unsafe, increasing the risk of slipping or losing control of the assistive device.
- 98.2. An even more serious issue is that the ramp leads directly into a crater in the road, creating an uneven surface that compromises stability during transit. For Mr. Ramón's children, who suffer from spinal muscular atrophy, this type of barrier poses a considerable danger, as any vibration or sudden impact can cause discomfort, pain, and even affect their posture in the Convoy device.
- 98.3. The proposed solutions include rebuilding the ramp with the proper incline and a non-slip surface, as well as installing visible signage to indicate its accessibility. Additionally, repairing the crater in the road is essential to eliminate irregular surfaces that compromise the stability of the children, V.R.R. and F.R.R. These improvements will not only allow Mr. Ramón's children to move more safely and comfortably but will also reduce the risk of accidents.

99. Mr. Ramón and his children, V.R.R. and F.R.R., walk through the streets of Arecibo, always together due to the children's condition, which prevents them from being alone. In this sense, they wish to walk along the sidewalk located on Jurregui Street, Arecibo, PR 00612-0000, at coordinates 18.47279261012666, -66.7153756232567, as this route allows them to move towards several nearby points of interest.
100. Their main motivation is to enjoy a walk and explore the architecture of the Cine-Teatro Oliver, a building that catches their attention due to its historical and architectural value. The history of the place emotionally connects them, as they believe that such visits improve their routine and allow them to explore Arecibo's history in a different way. This type of outing provides them with a sense of calm and helps them break the daily monotony. However, since January 2025, they have been aware of the architectural barriers in the area. Despite this, they attempted to visit in February and March 2025 but were discouraged due to the lack of safety for their mobility. Nevertheless, they will go in three months to enjoy the historical site and admire its beautiful building. These are the barriers:
  - 100.1. Mr. Ramón and his children are aware that the lack of an accessible and safe ramp represents a significant obstacle to their mobility. The current ramp lacks proper signage, making it difficult for Mr. Ramón's children to identify it. Additionally, its incorrect incline makes ascending and descending unsafe.
  - 100.2. An even more serious issue is that the ramp leads directly into a crater in the road, creating an uneven surface that compromises stability during transit. For Mr. Ramón's children, who suffer from spinal muscular atrophy, this type of barrier

poses a considerable danger, as any vibration or sudden impact causes discomfort, pain, and even affects their posture in the Convoy device.

- 100.3. To ensure a safe and accessible passage for Mr. Ramón and his children, it is essential to relocate and redesign the access ramp with an appropriate slope and a continuous surface that allows the convoy to move without obstacles. Additionally, the sidewalk must be repaired by eliminating cracks and leveling the ground to prevent hazardous unevenness, as well as conducting regular maintenance to prevent weed growth. Implementing clear signage and ensuring the presence of wide, barrier-free spaces will help V.R.R. and F.R.R. move independently and safely, thereby improving their quality of life and guaranteeing their right to dignified mobility. If these solutions are implemented, Mr. Ramón and his children will be able to navigate the area without difficulty.
101. Mr. Ramón and his children, V.R.R. and F.R.R., wish to walk along the sidewalk located on San Felipe Street, Arecibo, PR 00612-0000, at coordinates 18.471428887235774, -66.71681223583002. They intend to do so because they want to visit several nearby commercial establishments, especially a bakery called La Criolla, which has caught their attention due to the pictures of its breads and desserts. They are particularly interested in trying them as they are fond of bread with cheese and ham, and they have also heard about the bakery's excellent customer service.
102. However, since December 2024, they have been aware of the architectural barriers in the area, which discouraged them from visiting in January and February of 2025, this has caused them frustration and made them feel excluded, as these barriers go against their



autonomy and freedom of movement. Despite this, they are going to go in four months to enjoy their delicious bread and exquisite desserts. The existing barriers are:

- 102.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the corner lacks an accessible ramp despite the existing level difference, preventing a safe transition between the street and the sidewalk. This barrier forces V.R.R. and F.R.R., who rely on their convoys for mobility, to depend entirely on their father's assistance to overcome the obstacle, significantly limiting their autonomy and independence. This situation generates frustration for the children, as it increases the risk of falls and injuries due to unstable movements and forced maneuvers they must perform. The lack of a continuous and adapted surface also causes them pain and discomfort in their muscles, further worsening their well-being. For Mr. Ramón, this represents a significant physical, emotional, and mental burden, as he must constantly exert himself to help his children, which increases his fatigue and the risk of accidents while trying to protect them from falls or injuries.
- 102.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the unauthorized parking of vehicles on the sidewalk obstructs pedestrian access, making it even more difficult for them to navigate safely. This barrier forces V.R.R. and F.R.R. to move onto the roadway, exposing them to a dangerous situation as they are in an area not designed for pedestrian safety and are exposed to vehicle traffic. These movements require the children to exert additional physical effort, causing them discomfort and increasing the risk of falls or injuries. For Mr. Ramón, this situation adds extra strain, as he must guide his children off the sidewalk, which

increases his physical, emotional, and mental exhaustion while also putting him at greater risk as he has to protect his children in a hazardous environment.

102.3. To eliminate the barriers faced by Mr. Ramón and his children, V.R.R. and F.R.R., it is necessary to install an accessible ramp at the corner, allowing for a safe transition between the street and the sidewalk, removing the children's reliance on their father's assistance to overcome the obstacle. Installing a continuous and adapted surface would also reduce the risk of falls while alleviating the pain and discomfort the children experience from having to make unstable movements. Additionally, strict regulations should be enforced to prevent unauthorized parking on the sidewalk, ensuring clear pedestrian access. Creating a designated safe area for pedestrians on the sidewalk would prevent V.R.R. and F.R.R. from having to move onto the roadway, reducing the risk of accidents and exposure to vehicle traffic. These solutions would not only improve the children's safety but also ease the physical, emotional, and mental burden on Mr. Ramón, allowing him to assist his children in a more comfortable and secure way without being exposed to dangerous situations.

103. Mr. Ramón and his children, V.R.R. and F.R.R., wish to walk along the sidewalk located on Oriosto Cruz Street, Arecibo, PR 00612-0000, at coordinates 18.472210038556028, -66.71294140380509. Their main motivation is to visit restaurants such as Kanpai, a cozy café known for its excellent service and friendliness. Additionally, it offers delicious pastries and spectacular coffee, accompanied by impressive homemade syrups that enhance the flavor of their lattes, which generates great curiosity to enjoy their products. They also wish to visit POKE-SI, as Asian food is one of their favorites, and they are

eager to try its famous ramen, recognized as one of the best, along with its excellent service. Exploring new restaurants is a rewarding experience for both Mr. Ramón and his children, as it allows them to break their routine and discover new dishes.

104. However, since January 2025, they are aware of the architectural barriers present in the area, and although they wanted to go in February and March, they were discouraged by these same barriers, thanks to these barriers, they have felt sad, vulnerable, and excluded, as these obstacles not only limit their mobility but also infringe on their right to enjoy public spaces freely. Nevertheless, they will go in 4 months to enjoy the delicious food prepared at those restaurants they are eager to try. The existing barriers are:

104.1. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the sidewalk surface is uneven due to deterioration, with deep cracks and irregular areas that make it difficult to move. These barriers pose an additional risk, as the unstable surfaces increase the likelihood of trips and falls, especially for V.R.R. and F.R.R., who rely on mobility devices like the Convoy to get around. The impact of these irregularities not only affects their safety but also requires considerable effort from Mr. Ramón, who, as a caregiver, must maneuver carefully to prevent his children from experiencing accidents. The physical, emotional, and mental toll this situation takes on him is compounded by the constant need to ensure his children's safety, making moving along the sidewalk an even more challenging and exhausting task for all.

104.2. Mr. Ramón and his children, V.R.R. and F.R.R., are aware that the accumulation of dirt, debris, and overgrown vegetation significantly reduces the available space on the sidewalk, making it almost impassable. This obstruction forces V.R.R. and

F.R.R. to perform forced and often difficult maneuvers with their convoys, causing them constant discomfort, fatigue, and an increased risk of falls or injuries. For them, relying on convoys to move independently, this situation worsens their quality of life, as every movement becomes a challenging task. For Mr. Ramón, this adds an extra burden, not only physically but also emotionally, as he must remain vigilant at all times to prevent his children from experiencing accidents, constantly making decisions to ensure their safety.

104.3. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the absence of ramps at street crossings, which makes the transition between the sidewalk and the roadway difficult. This barrier forces V.R.R. and F.R.R. to stop abruptly and perform forced maneuvers with their convoys, which not only causes them discomfort but also significantly increases the risk of pain or injury due to the physical effort they must exert. For them, who rely on their convoys for mobility, each crossing becomes a challenge that compromises their well-being and safety. For Mr. Ramón, this represents an additional burden, as he must lift or tilt his children's convoys, which not only increases his physical effort but also raises the risk of accidents that could seriously harm his children.

104.4. Mr. Ramón and his children, V.R.R. and F.R.R., are aware of the deteriorating infrastructure, with broken or missing sections, which forces them to move onto the street, exposing them to dangerous situations. For V.R.R. and F.R.R., this presents an immediate risk, as they rely on a stable path for safe movement, and due to the unstable surface, they are constantly at risk of falls, bumps, or injuries. For Mr. Ramón, this situation intensifies the tension and difficulty of every

journey, as he must take extreme precautions to prevent his children from experiencing accidents, which increases his physical and emotional effort as he must remain constantly alert to protect them.

- 104.5. To address the barriers faced by Mr. Ramón and his children, V.R.R. and F.R.R., measures must be implemented to ensure safer and more comfortable access for them. First, it is essential to repair the sidewalk by leveling uneven surfaces and fixing deep cracks to prevent trips and falls. Additionally, ramps should be installed at street crossings to allow for a smoother and safer transition between the sidewalk and the roadway, avoiding forced maneuvers that cause discomfort and the risk of injury. Sidewalk maintenance must also be improved by removing dirt, debris, and overgrown vegetation that reduce the available space, ensuring a clear and accessible path for individuals using mobility devices like convoys. Finally, the infrastructure of the sidewalks should be reinforced to prevent further deterioration, which would force people to move into the street, exposing them to dangerous situations. These actions would not only improve the safety of V.R.R. and F.R.R., but also alleviate the physical, emotional, and mental burden on Mr. Ramón, easing his role as a caregiver and improving the overall quality of life for all.
105. V.R.R., F.R.R., and Mr. Ramón Rivera are interested in visiting the sidewalk at Highway 129, Arecibo, PR 00612-0000, as they know that the restaurant Ruta 129 Gastropark offers quick, good food at a fair price, especially the tacos. They are also aware that the bathroom is clean and well-equipped. Additionally, they are interested in the restaurant Whatever by Frito723, which they know is perfect for food lovers, and its owners are

experts in the kitchen. They know that the "signature plate" called the Burgwich is a standout option, with fresh, local ingredients and juicy, flavorful meat. To reach both businesses, they must pass through the sidewalks at Highway 129, Arecibo, PR 00612-0000.

106. However, since January 2025, they have been aware that the sidewalks in this area have many barriers, which expose V.R.R. and F.R.R. to an unequal and degrading situation. For this reason, both the children and Mr. Ramón feel discouraged from walking through these sidewalks. They had wanted to visit in February and March 2025, but because of their knowledge of the barriers, they have not done so. Despite this, they plan to visit in 4 months to enjoy the restaurants Ruta 129 Gastropark and Whatever by Frito723, and walk together as a family along the sidewalks while enjoying the atmosphere. V.R.R., F.R.R., and Mr. Ramón are aware of the following barriers at Highway 129, Arecibo, PR 00612-0000:

- 106.1. V.R.R., F.R.R., and Mr. Ramón are aware of the extremely narrow sidewalk at Highway 129, Arecibo, PR 00612-0000, with coordinates 18.447369290467034, -66.75107563448888. This sidewalk does not provide enough space for the children to safely navigate with their convoys, severely limiting their mobility. V.R.R. and F.R.R. face continuous difficulties attempting to maneuver through the narrow space, which increases the risk of getting stuck or their convoys becoming unstable. The inability to move freely directly impacts their physical and emotional well-being, causing frustration and anxiety, as they are constantly exposed to the feeling of being trapped or unable to advance. The restrictions on their movement also prevent them from enjoying their independence, which

affects their self-esteem and their ability to interact with their environment. Mr. Ramón, who must continuously assist them, is also affected, as he has to be vigilant about each movement to avoid accidents, causing both physical and emotional exhaustion.

106.2. In addition to the narrowness of the sidewalk, V.R.R., F.R.R., and Mr. Ramón are aware of the sidewalk being blocked by weeds and posts in the same area of Highway 129, Arecibo, PR 00612-0000, with coordinates 18.447369290467034, -66.75107563448888. The children, relying on their convoys, face a significant obstacle in their ability to move safely. The weeds getting caught in the convoy wheels can cause them to stop unexpectedly, forcing them to halt and be assisted to continue. Additionally, the posts along the path prevent them from making necessary turns or maneuvers, forcing them to try to find alternative routes that are generally not designed for safe convoy passage. This obstruction not only affects their mobility but also creates a sense of helplessness and vulnerability in the children, who must rely even more on their father to move forward, stripping them of a sense of autonomy that is already limited due to their condition. Mr. Ramón is forced to intervene physically to move the obstacles, which increases his workload and contributes to his fatigue. This creates a cycle of dependency and frustration for all involved.

106.3. Furthermore, V.R.R., F.R.R., and Mr. Ramón are aware of the cracks that run through the sidewalk at Highway 129, Arecibo, PR 00612-0000, with coordinates 18.447369290467034, -66.75107563448888. The cracks in the sidewalk present a constant danger to V.R.R. and F.R.R., as the convoys cannot move without the

risk of getting stuck or becoming unstable. Each crack is a barrier that interrupts their movement, forcing them to stop and be assisted to continue, resulting in a loss of time and safety. The danger posed by these cracks is even greater for the children, as the instability in their movement can lead to falls or accidents, worsening their already vulnerable situation due to their health condition. This constant threat of falling not only affects their physical well-being but also has an emotional impact, as they live with the fear of being injured while attempting to navigate an environment that is not adapted to their needs. Furthermore, Mr. Ramón, who must be constantly vigilant to avoid accidents, experiences both physical and emotional weariness, as he is forced to intervene in every movement of his children to ensure their safety.

106.4. V.R.R., F.R.R., and Mr. Ramón are aware of the corner of the sidewalk at Highway 129, Arecibo, PR 00612-0000, with coordinates 18.448023643709274, -66.7505421102471, where there is a ramp in poor condition. This deteriorated ramp presents a serious obstacle for V.R.R. and F.R.R., who rely on their convoys for mobility. The uneven surface and poor condition of the ramp make it difficult for them to move, as it can cause their convoys to stop or become unstable. V.R.R. and F.R.R., due to their spinal muscular atrophy, experience significant muscle weakness that prevents them from adjusting or correcting their movement independently, leaving them at risk of falls or injuries. The difficulty in navigating this deteriorated ramp increases the frustration of V.R.R. and F.R.R., as they cannot move with the independence they require. Mr. Ramón, who assists V.R.R. and F.R.R. at every step, is forced to exert additional physical effort to ensure that



his children can overcome this barrier, which creates considerable emotional and physical strain as he must remain constantly alert to prevent accidents.

- 106.5. V.R.R., F.R.R., and Mr. Ramón are aware of the narrow sidewalk at Highway 129, Arecibo, PR 00612-0000, with coordinates 18.448023643709274, -66.7505421102471. Due to their spinal muscular atrophy, V.R.R. and F.R.R. experience progressive muscle weakness that affects their ability to move independently. This condition, along with their reliance on convoys for mobility, makes navigating such a narrow sidewalk particularly difficult and dangerous. The lack of space makes it challenging for V.R.R. and F.R.R. to maneuver safely, increasing the risk of getting stuck or their convoys becoming unstable. This barrier severely limits their independence and causes constant frustration and anxiety, as they are forced to rely on their father to move safely. Mr. Ramón, while accompanying V.R.R. and F.R.R., is compelled to exert additional effort to help them overcome this difficulty, leading to significant physical and emotional exhaustion while ensuring their safe passage.
- 106.6. Additionally, V.R.R., F.R.R., and Mr. Ramón are aware of the deteriorated sidewalk with cracks and irregularities at Highway 129, Arecibo, PR 00612-0000, with coordinates 18.448023643709274. The cracks and uneven pavement significantly increase the difficulty for V.R.R. and F.R.R. to travel safely. Since V.R.R. and F.R.R. rely on their convoys due to their spinal muscular atrophy, the uneven surface can destabilize their convoys, interrupting their movement and exposing them to a higher risk of falls or accidents. The irregularities in the pavement not only hinder their ability to move smoothly but also increase their

distress, as they feel that their options for safe travel are severely limited. This situation impacts their physical and emotional well-being, as they must depend even more on their father for assistance, further limiting their independence. Mr. Ramón is affected as he must constantly intervene to ensure that V.R.R. and F.R.R. can continue safely, leading to considerable physical and emotional weariness while providing continuous support.

106.7. To address the barriers at Highway 129, Arecibo, PR 00612-0000, immediate and effective solutions must be implemented to ensure accessibility and safety for V.R.R., F.R.R., and others with similar mobility needs. The narrow sidewalk should be widened to provide enough space for convoys to maneuver freely, minimizing the risk of getting stuck or destabilizing. This could be achieved by removing any obstructions such as posts and ensuring the path is clear of weeds. Additionally, the ramp at the corner must be repaired to eliminate its uneven surface, with a smooth, stable, and properly inclined slope to facilitate safe passage for those with mobility devices. The sidewalk, currently deteriorated with cracks and irregularities, should be resurfaced to create a smooth and even path, reducing the risk of falls or accidents. These improvements will enhance mobility and independence, reducing the physical and emotional strain on V.R.R. and F.R.R., while also lightening the burden on Mr. Ramón, ensuring a safer and more accessible environment for everyone.

107. V.R.R., F.R.R., and Mr. Ramón Rivera are interested in visiting the sidewalk at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, as they are especially interested in visiting the restaurants previously mentioned, such as Ruta 129 Gastropark and Whatever

by Frito723, which are very close to that area. However, they are also eager to try new places, such as the restaurant Shibō Latin Asian, which they know offers absolutely exquisite food, with an excellent selection of dishes that stand out in both flavor and presentation. They would like to try the kimchi and chicken. Additionally, they are interested in Tacos al Pastor, a restaurant that offers good food, excellent service, and a friendly atmosphere, and they would like to try their tacos. To reach these businesses, they must pass through the sidewalks at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000.

108. However, since December 2024, they have been aware that the sidewalks at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000 have many barriers, which expose V.R.R. and F.R.R. to a discriminatory and humiliating situation. Although they had wanted to go in January, February, and March 2025, they have not done so due to these barriers. For this reason, both the children and Mr. Ramón feel discouraged from walking through these sidewalks. Nonetheless, they plan to visit in 4 months to enjoy the places of their interest and walk together as a family along the sidewalks. V.R.R., F.R.R., and Mr. Ramón are aware of the following barriers at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000:

- 108.1. V.R.R., F.R.R., and Mr. Ramón are aware of the corner of the sidewalk at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.44818293833415, -66.75042213099329, where the sidewalk is severely damaged, with deep cracks and water-filled craters. These large puddles almost completely block the path, presenting an immediate danger to V.R.R. and F.R.R., who rely on their convoys for mobility. The deep cracks and water-filled craters

make the path very unstable and risky, exposing the children to the possibility of their convoys getting stuck or becoming unstable. Due to their spinal muscular atrophy, V.R.R. and F.R.R. have difficulty correcting any misalignment in their convoys on their own, making them especially vulnerable to falls. Mr. Ramón, while accompanying his children, is forced to exert additional effort to help them navigate these obstacles, which increases his physical and emotional burden while ensuring the children move safely.

108.2. In addition to the cracks and puddles, V.R.R., F.R.R., and Mr. Ramón are aware of the weeds growing through the cracks in the sidewalk at the corner of Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.44818293833415, -66.75042213099329. The weeds protruding from the cracks further obstruct the path, as the wheels of V.R.R. and F.R.R.'s convoys can get caught in the plants, potentially stopping their movement altogether. This barrier increases the children's dependence on their father, as they must rely on him to help free their convoys from the obstructions. Additionally, the weeds represent an obstacle that makes the sidewalk even more inaccessible, generating frustration and anxiety for V.R.R. and F.R.R., who already face enough challenges moving due to their health condition. Mr. Ramón, having to intervene to remove the obstructions, experiences increased physical effort and emotional stress, as he must stay vigilant at every step to ensure his children's safety.

108.3. Furthermore, V.R.R., F.R.R., and Mr. Ramón are aware of the post located at the corner of the sidewalk at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.44818293833415, -66.75042213099329. Due to

the extremely narrow dimensions of the sidewalk, the post completely blocks the path, preventing V.R.R. and F.R.R. from continuing their journey with their convoys. The narrowness of the path forces the children to rely entirely on their father to navigate around this barrier, as they do not have enough space to maneuver on their own. This increases the frustration of V.R.R. and F.R.R., who already struggle to maintain their independence due to their spinal muscular atrophy. The lack of accessibility in this part of the sidewalk also forces Mr. Ramón to exert additional physical effort, contributing to both physical and emotional exhaustion as he assists his children every step of the way.

108.4. Finally, V.R.R., F.R.R., and Mr. Ramón are aware of the lack of a ramp at this corner of the sidewalk at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.44818293833415, -66.75042213099329. The absence of a ramp prevents V.R.R. and F.R.R. from safely accessing the sidewalk, as the path is completely inaccessible for their convoys. Due to their spinal muscular atrophy, V.R.R. and F.R.R. lack the ability to adapt to such obstacles, which increases their dependence on Mr. Ramón, who must seek alternative routes to get his children to their destination. The lack of a ramp not only affects the children's mobility but also contributes to everyone's frustration, as they are forced to face a barrier that could have been avoided with the inclusion of an accessible solution. This further exacerbates Mr. Ramón's physical and emotional effort, as he must manage the situation without being able to ensure a safe and accessible route for his children.

108.5. V.R.R., F.R.R., and Mr. Ramón are aware of the extremely narrow sidewalk at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.448271251380792, -66.75035692878957 to 18.449994056840925, -66.74887092328011. The narrowness of the sidewalk makes it difficult for V.R.R. and F.R.R. to move safely with their convoys. Due to their spinal muscular atrophy, V.R.R. and F.R.R. struggle to maneuver in such a limited space, as their convoys do not have enough room to move freely. This forces the children to stop frequently and rely on their father to continue, interrupting their mobility and preventing them from enjoying the independence they need. V.R.R. and F.R.R. are emotionally affected by not being able to move freely, causing frustration and a sense of helplessness. Mr. Ramón, while accompanying them, is forced to exert additional physical effort to ensure his children can move forward in this confined space, which increases his physical and emotional burden. This barrier limits the children's ability to interact with their environment and affects the quality of their daily movement.

108.6. V.R.R., F.R.R., and Mr. Ramón are aware of the sidewalk with weeds at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.448271251380792, -66.75035692878957 to 18.449994056840925, -66.74887092328011. The weeds growing through the cracks on the sidewalk make it difficult for V.R.R. and F.R.R. to pass, as they are forced to stop each time the plants block the wheels of their convoys. This prevents them from moving forward continuously and forces them to rely on their father to clear the obstructions. Since V.R.R. and F.R.R. cannot adjust their convoys themselves due

to their spinal muscular atrophy, the weeds create an additional barrier that increases their frustration and limits them emotionally, as they cannot move independently. Mr. Ramón, having to clear the plants from the sidewalk, has to exert extra physical effort, which increases his fatigue and stress, while ensuring that his children can continue their journey safely.

108.7. V.R.R., F.R.R., and Mr. Ramón are aware of the cracked corner at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.450104557621554, -66.74875413017556. The cracks at the corner severely hinder V.R.R. and F.R.R.'s ability to pass, as they rely on their convoys for mobility. The irregularities in the sidewalk cause their convoys to stop or become unstable, interrupting their movement and requiring constant assistance. Due to their spinal muscular atrophy, V.R.R. and F.R.R. are unable to correct any misalignment themselves, increasing their frustration and anxiety. Mr. Ramón, while accompanying them, is forced to exert additional physical effort to ensure that his children can continue safely, which results in considerable physical and emotional exhaustion.

108.8. In addition to the cracks, V.R.R., F.R.R., and Mr. Ramón are aware of the weeds growing through the cracks at the corner of Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.450104557621554, -66.74875413017556. The weeds protruding from the cracks partially block the path, causing the wheels of V.R.R. and F.R.R.'s convoys to get stuck. This forces the children to stop and rely entirely on their father to free their convoys from the obstructions. Additionally, the weeds further impede access and increase the sense

of vulnerability, as the children cannot move forward without their father's help, limiting their independence. Mr. Ramón experiences additional physical strain each time he has to clear the weeds, contributing to his fatigue and frustration.

108.9. Furthermore, V.R.R., F.R.R., and Mr. Ramón are aware of the lack of a ramp at the corner of Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.450104557621554, -66.74875413017556. The absence of a ramp prevents V.R.R. and F.R.R. from safely accessing the sidewalk with their convoys. Due to their health condition, the children are unable to adapt to the lack of a ramp, forcing them to rely entirely on their father to find an alternative route. The lack of accessibility at this corner severely limits the children's ability to move independently, creating frustration and increasing their dependence on their father. Mr. Ramón, unable to find a safe solution, is forced to exert additional effort to ensure that his children can continue on their way, which increases his physical and emotional burden.

108.10. V.R.R., F.R.R., and Mr. Ramón are aware of the cracked corner at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.45016180531591, -66.74870786207111. The cracks at the corner make it difficult for V.R.R. and F.R.R. to move freely, as they depend on their convoys for mobility. The uneven surface causes their convoys to halt or become unsteady, disrupting their movement and requiring them to rely on their father for help. Because of their spinal muscular atrophy, V.R.R. and F.R.R. cannot adjust the convoys themselves, leading to frustration and anxiety. This forces Mr. Ramón to exert more physical



effort, ensuring his children can keep moving safely, which adds to the physical and emotional toll on him.

108.11. Furthermore, V.R.R., F.R.R., and Mr. Ramón are aware of the weeds growing through the cracks at the corner of Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.45016180531591, -66.74870786207111. The weeds obstruct part of the path, causing the wheels of V.R.R. and F.R.R.'s convoys to become caught. This forces the children to stop and rely fully on their father to clear the path. The weeds also create additional barriers, making the children feel even more dependent, as they cannot continue without their father's help. With each obstruction, Mr. Ramón must physically intervene, leading to additional strain, which intensifies his frustration and exhaustion.

108.12. In addition, V.R.R., F.R.R., and Mr. Ramón are aware of the lack of a ramp at the corner of Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.45016180531591, -66.74870786207111. Without a ramp, V.R.R. and F.R.R. are unable to safely access the sidewalk with their convoys. Due to their health conditions, they are unable to navigate this obstacle on their own and must completely depend on their father to find another way. The absence of a ramp significantly limits their independence, causing frustration and increasing their reliance on their father. This situation places further physical and emotional demands on Mr. Ramón, as he continues to manage the challenges of ensuring his children's safe passage through the area.

108.13. V.R.R., F.R.R., and Mr. Ramón are aware of the narrow sidewalk at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates

18.450180815958678, -66.74869056374061. The narrowness of the sidewalk prevents V.R.R. and F.R.R. from moving easily and safely with their convoys. Due to their spinal muscular atrophy, V.R.R. and F.R.R. have progressive muscle weakness, making it difficult for them to maneuver in such a confined space. This limitation forces them to stop frequently, as they do not have enough space to move forward without their father's help. The lack of autonomy and the inability to move freely causes them to feel helpless, frustrated, and anxious, severely impacting their emotional well-being. Each stop and adjustment requires additional physical effort, depriving them of the ability to enjoy their independence. Mr. Ramón, while accompanying them, must make constant efforts to help them navigate these barriers, which leads to ongoing physical and emotional exhaustion as he ensures V.R.R. and F.R.R. can continue their journey.

- 108.14. In addition, V.R.R., F.R.R., and Mr. Ramón are aware of the posts obstructing the sidewalk at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.450180815958678, -66.74869056374061. The posts completely block the path, forcing V.R.R. and F.R.R. to rely entirely on their father to move forward. This barrier significantly increases the children's sense of dependence, as they cannot overcome it on their own. V.R.R. and F.R.R. experience great frustration by not being able to move freely, which affects their emotional well-being. The feeling of being trapped in a confined space, where the posts block their way, increases their anxiety and further limits their ability to interact with their environment. Mr. Ramón, on the other hand, is forced to exert additional physical effort to move the posts or find an alternative route, which

intensifies his physical and emotional exhaustion while ensuring his children are not exposed to danger or injury.

108.15. V.R.R., F.R.R., and Mr. Ramón are aware of the narrow sidewalks at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.450539505601423, -66.74835902190172. The narrowness of the sidewalk makes it difficult for V.R.R. and F.R.R. to move safely with their convoys. Due to their spinal muscular atrophy, the children experience progressive muscle weakness, which makes it difficult for them to maneuver in such a confined space without assistance. This barrier causes them to stop frequently, as they don't have enough space to move forward on their own. The lack of independence generates frustration and anxiety, as they are unable to proceed with the autonomy they require. Mr. Ramón is forced to exert additional effort to help them overcome this difficulty, which increases his physical and emotional burden while ensuring that his children move safely.

108.16. Additionally, V.R.R., F.R.R., and Mr. Ramón are aware of the weeds obstructing the sidewalk at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.450539505601423, -66.74835902190172. The weeds growing through the sidewalk block the path, making it even harder for V.R.R. and F.R.R. to move with their convoys. The wheels of the children's convoys get stuck in the plants, forcing them to stop and wait for their father to clear the path. This obstruction not only prevents them from moving smoothly but also causes frustration and a sense of vulnerability, as they rely completely on their father to move the plants. Mr. Ramón, having to intervene to clear the way, experiences

additional physical strain, contributing to his fatigue and increasing his emotional stress.

108.17. To address the barriers at Hwy. Mariana Bracetti, Hwy. 129, Arecibo, PR 00612-0000, immediate improvements are necessary to ensure accessibility and safety for all users, especially those with mobility challenges. The narrow sidewalks should be widened to provide adequate space for convoys, ensuring that V.R.R. and F.R.R. can move freely without interruption. In addition, the cracks and water-filled craters must be repaired to create a smooth, stable surface, preventing any instability or risk of the convoys getting stuck. The weeds growing through the cracks should be removed and regularly maintained to prevent obstructions, ensuring a clear and uninterrupted path for users. The posts blocking the sidewalk should be relocated or removed to create a safe and accessible route. Additionally, several proper ramps should be installed along the sidewalk to ensure that V.R.R. and F.R.R. can access it safely from different points. These improvements will not only reduce Mr. Ramón's dependency, but also provide V.R.R. and F.R.R. with the independence they need, ensuring their safety and well-being.

109. V.R.R., F.R.R., and Mr. Ramón Rivera are interested in visiting the sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, as they know that the restaurant King China offers excellent food. They know the food is tasty, with generous portions and a wide variety of well-prepared dishes. In fact, they would like to try the orange chicken and the fried chicken breast, which are standout options on the menu. Additionally, they know

that the service is friendly and the place is very clean. However, to reach the restaurant, they must pass through the sidewalks at this location.

110. However, since February 2025, they have been aware that the sidewalks in this area are full of barriers, exposing V.R.R. and F.R.R. to a degrading and discriminatory situation. Although they had planned to visit in March 2025, they have not done so due to these barriers. For this reason, both the children and Mr. Ramón feel discouraged from walking through these sidewalks. Nonetheless, they plan to visit in 3 months to enjoy the King China restaurant and walk together as a family along the sidewalks. Finally, V.R.R., F.R.R., and Mr. Ramón are aware of the following barriers at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000:

- 110.1. V.R.R., F.R.R., and Mr. Ramón are aware of the corner of the sidewalk obstructed by posts and traffic signs at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.456788782584393, -66.74250843860331. The posts and signs completely block the path, preventing V.R.R. and F.R.R. from moving their convoys safely. Due to their spinal muscular atrophy, V.R.R. and F.R.R. experience significant muscle weakness, making it difficult for them to maneuver in such a narrow space. Their inability to move their convoys without help creates a constant sense of frustration, as they cannot move independently, affecting their emotional well-being and self-esteem. Every time they are forced to stop and rely on their father to navigate these obstacles, they feel more vulnerable, as their independence is limited. Mr. Ramón, having to intervene to clear the way, is forced to exert additional physical effort, which leads to both physical and

emotional exhaustion while ensuring his children can continue their journey safely.

110.2. Additionally, V.R.R., F.R.R., and Mr. Ramón are aware of the lack of ramps at the corner of the sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.456788782584393, -66.74250843860331. The absence of ramps prevents V.R.R. and F.R.R. from safely accessing the sidewalk with their convoys. Due to their spinal muscular atrophy, the children cannot overcome this obstacle on their own, which leads to greater frustration and anxiety. V.R.R. and F.R.R. are unable to adapt to the lack of ramps, forcing them to rely entirely on their father to find an alternative route. This barrier not only limits their physical mobility but also affects their emotional well-being, as they feel they cannot fully participate in their surroundings. The constant dependence of V.R.R. and F.R.R. on Mr. Ramón to overcome these barriers increases the physical and emotional burden he already faces and further limits the children's independence, which leads to a sense of helplessness and vulnerability.

110.3. V.R.R., F.R.R., and Mr. Ramón are aware of the narrow ramp adjacent to the sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.456966149481513, -66.74245259807569. The ramp is too narrow for V.R.R. and F.R.R. to move safely with their convoys. Due to their spinal muscular atrophy, the children struggle to maneuver in such a confined space, forcing them to stop frequently and rely on their father to continue. This barrier prevents them from moving smoothly and creates frustration, as they are unable to enjoy the independence they need. Mr. Ramón, while accompanying them, is forced to exert

additional physical effort to help them overcome this limitation, which increases his physical and emotional burden.

110.4. Additionally, V.R.R., F.R.R., and Mr. Ramón are aware of the cracks on the ramp adjacent to the sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.456966149481513, -66.74245259807569. The cracks on the ramp make it difficult for V.R.R. and F.R.R. to move safely with their convoys. The cracks cause their convoys to become unstable, interrupting their movement and forcing them to depend on their father to correct the situation. This barrier not only prevents them from advancing safely but also generates anxiety and frustration, as they cannot continue their journey without assistance. Mr. Ramón has to exert extra physical effort to help them, which adds to his physical and emotional exhaustion.

110.5. Finally, V.R.R., F.R.R., and Mr. Ramón are aware of the worn-out paint on the ramp adjacent to the sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.456966149481513, -66.74245259807569. The worn-out paint makes it difficult to identify the ramp, which makes it harder for V.R.R. and F.R.R. to locate the accessible path, especially when they need to use it for safe movement. This lack of visibility increases the children's dependence on their father, as they must rely on him to guide them properly along the ramp. The difficulty in identifying the ramp also adds to the frustration and sense of insecurity for V.R.R. and F.R.R., who are already facing significant challenges due to their health conditions. Mr. Ramón, having to guide his children constantly,

experiences an additional physical and emotional burden while ensuring they can proceed safely.

110.6. V.R.R., F.R.R., and Mr. Ramón are aware of the narrow sidewalks at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.457049924552052, -66.74235436992424. The narrowness of the sidewalk severely disrupts V.R.R. and F.R.R.'s ability to move independently with their convoys. Due to their spinal muscular atrophy, the children have muscle weakness that makes it difficult for them to maneuver their convoys in such a confined space. This limitation forces them to stop frequently, as they lack the control needed to move the convoys without help. The emotional impact is significant, as they cannot move autonomously, which increases their frustration and sense of helplessness. This lack of mobility also prevents them from freely interacting with their surroundings and participating in everyday activities, which affects their overall well-being. Mr. Ramón, having to continuously intervene to help his children, experiences constant physical and emotional exhaustion, as he must remain vigilant at every step to ensure their safety.

110.7. Additionally, V.R.R., F.R.R., and Mr. Ramón are aware of the cracks in the sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.457049924552052, -66.74235436992424. The cracks in the sidewalk represent a dangerous obstacle for V.R.R. and F.R.R., as their convoys, when stopped or destabilized by the cracks, interrupt their movement and force them to rely on their father to correct the situation. This not only delays their progress but also causes significant anxiety in the children, as they feel unsafe and vulnerable,



unable to control their convoys in an environment that is not adapted to their needs. The cracks directly affect their emotional well-being, as they cannot move with the autonomy they require, increasing their frustration and discouragement. Furthermore, each time they must stop, they feel their ability to interact with their surroundings is limited, affecting their self-esteem and sense of independence. Mr. Ramón, having to help constantly, faces additional physical and emotional strain, as each intervention to free the convoys from the cracks increases his workload, both physically and emotionally.

110.8. V.R.R., F.R.R., and Mr. Ramón are aware of the narrow sidewalks at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.47000236531382, -66.72919612658893 to 18.470532906027195, -66.72863902802933. The narrowness of the sidewalk severely hinders V.R.R. and F.R.R.'s ability to move safely with their convoys. Due to their spinal muscular atrophy, the children experience significant muscle weakness, making it difficult for them to maneuver in such a confined space without their father's help. Every time they are forced to stop, they feel a great deal of frustration, as they cannot move forward with the independence they require. The lack of space creates a constant sense of vulnerability and dependence on their father to continue their journey. Mr. Ramón, having to assist them continuously, faces physical and emotional exhaustion, as he must be attentive to every movement to ensure his children's safety.

110.9. Furthermore, in addition to the narrowness of the sidewalk, V.R.R., F.R.R., and Mr. Ramón are aware of the cracks on the sidewalk at Av. San Luis, Hwy. 129,

Arecibo, PR 00612-0000, at coordinates 18.47000236531382, -66.72919612658893 to 18.470532906027195, -66.72863902802933. The cracks on the sidewalk interrupt the movement of V.R.R. and F.R.R.'s convoys, causing their wheels to get stuck or the convoys to become unstable. This forces the children to rely on their father to correct the situation and continue their journey. The cracks not only hinder their mobility but also generate great anxiety and frustration, as they cannot move forward without assistance. Mr. Ramón is forced to exert additional physical effort to help them, which increases his physical and emotional exhaustion.

- 110.10. In addition to the narrowness and cracks, V.R.R., F.R.R., and Mr. Ramón are aware of the uneven sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.47000236531382, -66.72919612658893 to 18.470532906027195, -66.72863902802933. The uneven sidewalk causes V.R.R. and F.R.R.'s convoys to lose stability, interrupting their movement and forcing them to stop constantly. Due to their spinal muscular atrophy, the children have limited ability to correct the position of their convoys without assistance, which creates a constant sense of insecurity and vulnerability with every step they take. The ongoing imbalance in their convoys causes frustration, as each movement becomes an additional effort to progress, directly affecting their physical and emotional well-being. The constant interruption of their mobility also prevents them from participating in everyday activities with the same freedom as other children, affecting their self-esteem and causing feelings of helplessness. This barrier not only limits their autonomy but also generates considerable emotional

stress, as they must rely completely on their father to continue their journey. Mr. Ramón, having to intervene constantly to adjust and correct the course of the convoys, faces an additional physical and emotional burden, which increases his exhaustion while ensuring his children's safety.

- 110.11. V.R.R., F.R.R., and Mr. Ramón are aware of the corner completely obstructed by overgrown or tall weeds at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.47062551882541, -66.72841929621939. The weeds completely block the path for V.R.R. and F.R.R., who rely on their convoys to move safely. Due to their spinal muscular atrophy, the children cannot navigate this obstruction by themselves, forcing them to stop and wait for their father to clear the path. This lack of independence causes them great frustration, as they feel their mobility is restricted, which directly impacts their emotional well-being. The feeling of vulnerability and the inability to overcome an obstacle on their own causes anxiety and a sense of helplessness, as they cannot move forward without their father's assistance. Mr. Ramón, having to constantly intervene to remove the weeds, faces not only an additional physical effort but also a significant emotional burden, seeing his children's autonomy limited and their well-being affected by the lack of accessibility.
- 110.12. Additionally, V.R.R., F.R.R., and Mr. Ramón are aware of the post blocking the corner at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.47062551882541, -66.72841929621939. The post completely blocks the path, preventing V.R.R. and F.R.R. from continuing their journey without their father's help. This barrier is even more severe because the narrowness of the sidewalk

makes it impossible for the children to maneuver their convoys on their own. The inability to move forward without constant intervention from their father increases the children's frustration and creates a sense of helplessness, as they, due to their condition, cannot adjust or adapt to this obstacle. V.R.R. and F.R.R. not only suffer physically by having to rely on their father to move forward, but they also suffer emotionally, as they see their ability to interact with the world and move independently being restricted. Mr. Ramón, having to intervene to move the post, faces constant physical wear and tear, as each additional effort to clear the way increases his physical and emotional exhaustion.

110.13. V.R.R., F.R.R., and Mr. Ramón are aware of the lack of a ramp at the corner at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.47062551882541, -66.72841929621939. The absence of a ramp at this corner prevents V.R.R. and F.R.R. from safely accessing the sidewalk with their convoys. Due to their spinal muscular atrophy, the children cannot overcome this obstacle on their own, which significantly increases their reliance on their father. The inability to use an accessible route causes them great frustration and anxiety, as they cannot move independently, which affects their emotional well-being. Every time they face this barrier, they feel their independence is restricted and that they cannot fully engage with their surroundings. Mr. Ramón, having to find alternative routes or make extra efforts to help his children, experiences considerable physical and emotional exhaustion.

110.14. V.R.R., F.R.R., and Mr. Ramón are aware of the cracks in the sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.47062551882541,

-66.72841929621939. The cracks in the sidewalk severely hinder V.R.R. and F.R.R.'s ability to move with their convoys, as the wheels get stuck or the convoys become unstable. This forces the children to depend on their father to correct the situation and continue their journey. The cracks not only hinder their mobility but also generate great anxiety and frustration, as they cannot move forward without assistance. Mr. Ramón is forced to exert additional physical effort to help them, which increases his physical and emotional exhaustion.

110.15. Finally, V.R.R., F.R.R., and Mr. Ramón are aware of the narrow sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.47062551882541, -66.72841929621939. The lack of space on the sidewalk prevents V.R.R. and F.R.R. from moving their convoys easily. Due to their spinal muscular atrophy, the children do not have the strength or control necessary to maneuver in such a confined space without help. This barrier increases their reliance on Mr. Ramón, who is forced to exert extra effort to help them move forward. The feeling of not being able to move freely generates great frustration in the children, as they cannot enjoy the independence they need to interact with their environment. Mr. Ramón, having to assist them constantly, faces a significant physical and emotional burden, as every movement his children make becomes an additional effort, increasing his exhaustion.

110.16. V.R.R., F.R.R., and Mr. Ramón are aware of the narrow sidewalks obstructed by overgrown weeds, posts, and vehicles parked on them at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.470893679893614, -66.72823709739112 to 18.47172800375655, -66.72741090690086. The

narrowness of the sidewalk makes it difficult for V.R.R. and F.R.R. to move safely with their convoys, as there is not enough space to maneuver without their father's assistance. Due to their spinal muscular atrophy, the children do not have the strength or control needed to navigate obstacles like weeds, posts, or parked vehicles. Each time they encounter these barriers, they must stop and rely completely on their father to continue their journey. This causes them significant frustration and anxiety, as they are unable to enjoy the independence they need. Mr. Ramón, having to assist them in overcoming these obstacles, faces an additional burden, which increases his physical and emotional exhaustion while ensuring that his children can proceed safely.

- 110.17. Additionally, V.R.R., F.R.R., and Mr. Ramón are aware of the cracks and irregularities on the sidewalks at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.470893679893614, -66.72823709739112 to 18.47172800375655, -66.72741090690086. The cracks and irregularities in the sidewalk severely hinder V.R.R. and F.R.R.'s ability to move with their convoys, as the wheels get stuck or the convoys become unstable on the uneven surfaces. This barrier forces the children to stop and depend on their father to continue their journey. The cracks not only interrupt their movement but also generate significant anxiety and frustration, as they feel that their ability to move independently is limited. Mr. Ramón, having to intervene each time to correct the course of the convoys, faces an additional physical burden, as each effort to clear the path increases his physical and emotional exhaustion.

- 110.18. To address the various barriers along the sidewalks at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, it is essential to implement a comprehensive approach to ensure accessibility. First, the overgrown weeds must be cleared, and any posts or traffic signs obstructing the sidewalk must be relocated to provide a clear path for V.R.R. and F.R.R. to move safely with their convoys. Additionally, parking regulations should be enforced to prevent vehicles from blocking the sidewalk. Ramps must be installed at all corners, particularly where they are currently absent, to allow V.R.R. and F.R.R. to access the sidewalk independently, ensuring that the ramps are wide enough to accommodate their convoys. The cracks in the existing ramps adjacent to the sidewalk should be repaired, either by repaving or using another suitable method, to ensure they are stable and safe for the convoys. Repairing the cracked and uneven surfaces of the sidewalk would eliminate instability in the convoys, providing a smoother and safer route for the children. Furthermore, for the narrow and cracked sidewalk, it is crucial to widen the available space, either by expanding the sidewalk or implementing solutions that optimize the space, ensuring that the convoys can move without obstacles. Finally, repainting the ramp with clear and visible markings would help V.R.R. and F.R.R. identify and use the accessible path, reducing their dependence on their father for navigation. These solutions will address all the current accessibility barriers, providing V.R.R. and F.R.R. with the independence and safety they need while reducing Mr. Ramón's physical and emotional burden.
111. V.R.R., F.R.R., and Mr. Ramón Rivera are interested in visiting the sidewalk at 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, as they are especially

interested in the restaurant Bonjour Café & Sandwiches. They know it is a quiet place with excellent service and delicious food. They want to try the waffles, quesadillas, and chicken, as they are aware of the quality of the dishes offered. Additionally, they are also interested in visiting the restaurant El Farol, which attracts them with its good food, excellent service, cleanliness, and reasonable prices. They want to try the carrot cake, chicken, and shrimp. To reach both businesses, they must pass through the sidewalks at 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000.

112. However, since January 2025, they have been aware that the sidewalks at 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000 have many barriers, exposing V.R.R. and F.R.R. to a degrading and discriminatory situation. Although they had wanted to go in February and March 2025, they have not done so due to their knowledge of the barriers on the sidewalks. For this reason, both the children and Mr. Ramón feel discouraged from walking through these sidewalks. Nevertheless, they plan to visit in 4 months to try the dishes from the mentioned restaurants and spend some time as a family walking through the streets of Arecibo. V.R.R., F.R.R., and Mr. Ramón are aware of the following barriers at 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000:

- 112.1. V.R.R., F.R.R., and their father, Ramón Rivera, are aware that the sidewalks located at 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, at coordinates 18.47219856239144, -66.72832897543647, are narrow and do not allow safe passage for both children with their convoys simultaneously. This condition directly affects V.R.R. and F.R.R. as, due to their spinal muscular atrophy, they cannot perform complex maneuvers or easily adjust their path without direct assistance from an adult. The narrowness forces them to stop



constantly, wait their turn to move forward, or travel in single file, which interrupts their mobility rhythm and causes physical discomfort. For Ramón Rivera, this barrier presents a continuous challenge, as he must position himself behind one child while monitoring and controlling the other, leading to additional tension, constant physical effort, and an increased likelihood of stumbling or colliding with lateral obstacles. This situation prevents their movement from being smooth, safe, and dignified for all three.

- 112.2. V.R.R., F.R.R., and their father, Ramón Rivera, are aware that the sidewalk located at 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, at coordinates 18.472175852798546, -66.72961659206327, is obstructed by illegally parked vehicles, preventing safe and free passage for the children with their convoys. This barrier directly affects V.R.R. and F.R.R., who, due to their spinal muscular atrophy, rely entirely on their convoy for mobility. The vehicles parked on the sidewalk force them to stop, maneuver through tight spaces, or find alternative routes, significantly increasing the physical effort and fatigue for the children. This situation interrupts their ability to move freely and prevents them from navigating independently as they should. For Ramón Rivera, this obstruction adds an extra challenge, as he must guide and assist both children, which requires constant physical effort, as well as the emotional burden of ensuring their safety and well-being while trying to navigate around the obstacles. This increases tension and makes it difficult for the family to move smoothly and with dignity.
- 112.3. V.R.R., F.R.R., and their father, Ramón Rivera, are aware that the sidewalk located at 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, at

coordinates 18.472184800973775, -66.73053025170935, is narrow, making safe passage for the children with their convoys difficult. This barrier directly affects V.R.R. and F.R.R., who, due to their spinal muscular atrophy, cannot maneuver easily in tight spaces and require constant assistance to move safely. The narrowness forces the children to stop or move at a slower pace, increasing their physical effort and causing discomfort. For Ramón Rivera, this barrier represents an additional burden, as he must continuously assist the children, increasing both physical and emotional fatigue while ensuring they move without falling or having accidents.

- 112.4. To address the barrier of overgrown weeds along the sidewalk at Av. San Luis, Hwy. 129, Arecibo, PR 00612-0000, at coordinates 18.472169349030327, -66.73084396938559, it is essential to remove the weeds blocking the path of V.R.R. and F.R.R. The children, due to their spinal muscular atrophy, do not have the strength or control to navigate this obstruction on their own. The weeds prevent them from moving safely, causing significant frustration and anxiety, as they cannot move freely like other children. Every time they encounter this barrier, their independence is limited, directly affecting their emotional well-being. V.R.R. and F.R.R. feel helpless as they must rely entirely on their father to continue their journey, which increases their frustration and sense of vulnerability. Mr. Ramón, having to constantly intervene to remove the weeds, faces not only an additional physical effort but also a considerable emotional burden, as he sees how his children's autonomy is restricted and how their well-being is affected by the lack of accessibility.

- 112.5. V.R.R., F.R.R., and Mr. Ramón are aware of the cracked sidewalks at 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, at coordinates 18.47215812337618, -66.7311382705717. The cracks in the sidewalk severely hinder V.R.R. and F.R.R.'s ability to move with their convoys, as the wheels get stuck or the convoys become unstable when passing over the cracks. Due to their spinal muscular atrophy, the children do not have the ability to correct the alignment of their convoys on their own, which generates significant frustration and anxiety. Each time they stop due to the cracks, they feel limited in their ability to move independently, which affects their emotional well-being. Mr. Ramón, having to constantly intervene to correct the situation, faces an additional physical burden, as he must make continuous efforts to help the children overcome the cracks. This contributes to Mr. Ramón's physical and emotional exhaustion, as he ensures his children can continue safely.
- 112.6. To address the various barriers along the sidewalks at 517 José Joaquín "Yiye" Ávila Highway, Arecibo, PR 00612-0000, several improvements must be made to ensure accessibility. First, the sidewalk should be widened to allow V.R.R. and F.R.R. to move safely with their convoys without constant assistance. Illegal parking of vehicles must be regulated and enforced to prevent them from blocking the sidewalk, ensuring clear passage for the children. Additionally, the overgrown weeds should be removed to eliminate any obstacles in the path, allowing the children to move freely. The cracked surfaces of the sidewalks need to be repaired or repaved to provide a stable and smooth route, preventing the convoys from becoming unstable. These solutions will improve overall accessibility, providing

V.R.R. and F.R.R. with greater mobility, independence, and safety, while reducing the physical and emotional burden on Mr. Ramón.

**F. The Municipality of Vega Alta and the Commonwealth of Puerto Rico's Failure to Ensure Accessibility in Public Spaces**

113. The Municipality of Arecibo and the Commonwealth of Puerto Rico have continuously failed to address the accessibility barriers related to curb ramps that prevent V.R.R. and F.R.R. from moving safely and independently within their community. The ramps in various areas of Arecibo and the Commonwealth of Puerto Rico, as detailed in this Complaint, feature steep slopes, improper design, or deteriorated conditions that pose serious risks for individuals who rely on mobility devices. These ramps, which are supposed to provide safe transitions between sidewalks and streets, often become obstacles that block safe and accessible passage for V.R.R. and F.R.R.
114. Despite their legal obligation to ensure accessibility, the Municipality of Arecibo and the Commonwealth of Puerto Rico have failed to maintain their curb ramps in compliance with the Americans with Disabilities Act (ADA) and other applicable standards. This ongoing inaction has severely limited V.R.R. and F.R.R.'s ability to move freely and safely in their environment. As a result, they have felt discouraged from returning to many areas due to hazardous conditions that place their physical safety and mobility at risk
115. The Municipality of Arecibo and the Commonwealth of Puerto Rico have also failed to correct specific conditions that directly impair the functionality of curb ramps, including excessively steep grades, the absence of level landing surfaces, and abrupt transitions between the roadway and curb. These technical deficiencies prevent the mobility devices used by V.R.R. and F.R.R. from operating in a stable manner, further limiting their

autonomy and increasing the risk of accidents. Due to their diagnosis of spinal muscular atrophy, both children are extremely vulnerable to abrupt movements and instability. Any sudden tilt or jolt can cause them pain, muscle fatigue, or even injury.

116. As a result of these conditions created by the Municipality of Arecibo and the Commonwealth of Puerto Rico, V.R.R. and F.R.R. not only face physical barriers that prevent them from participating in community life, but also experience deep frustration and a sense of exclusion. Being unable to move freely and safely affects their right to enjoy public spaces and limits their physical, emotional, and social development.
117. The deficiencies created by the Municipality of Arecibo and the Commonwealth of Puerto Rico cause the most severe impact on V.R.R. and F.R.R., who are unable to navigate their community independently due to dangerous and non-compliant curb ramps. Their safety and mobility are continuously compromised by these accessibility failures. Additionally, Mr. Ramón, their father and primary caregiver, is forced to intervene constantly to compensate for the lack of accessible infrastructure. Each time they encounter a curb ramp with an improper slope or dangerous condition, he must apply extra force to push or manually tilt the mobility devices, placing a significant physical burden on himself and causing ongoing emotional stress from the constant fear that his children may fall or get hurt.
118. This pattern of inaction by the Municipality of Arecibo and the Commonwealth of Puerto Rico demonstrates a disregard for accessibility standards and for the rights of individuals with disabilities. While V.R.R. and F.R.R. are the most directly affected, the impact extends to their family unit, placing an unfair and disproportionate burden on their caregiver. The Municipality's and the Commonwealth's failure has limited the children's

freedom of movement, negatively affected their health and well-being, and imposed barriers that prevent them from living with the dignity and independence they deserve.

119. The Municipality of Arecibo and the Commonwealth of Puerto Rico's continued inaction constitutes a failure to fulfill their legal obligation to ensure accessibility, leaving V.R.R. and F.R.R., as well as their caregiver Mr. Ramón and other individuals with mobility disabilities, at a constant and unjust disadvantage

**G. Violations of Title III of the Americans with Disabilities Act (ADA) by Places of Public Accommodation Located in the Municipality of Arecibo and the Commonwealth of Puerto Rico**

120. The co-defendants identified in this Complaint as operators of places of public accommodation within the Municipality of Arecibo are subject to the requirements of Title III of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12181 et seq., which mandates that businesses ensure accessibility and equitable participation for individuals with disabilities in their facilities. Despite this clear legal obligation, these establishments continue to operate in violation of the ADA by failing to provide safe and accessible entry to their businesses for individuals with mobility disabilities, including V.R.R. and F.R.R.
121. The co-defendants have failed to comply with the ADA by maintaining architectural barriers that prevent V.R.R. and F.R.R. from freely and safely accessing their facilities. These violations include, but are not limited to:
- 121.1. Lack of properly designed accessible curb ramps, including those with excessive slopes, abrupt transitions, or deteriorated surfaces, which create dangerous conditions for individuals using mobility devices.

- 121.2. Absence of safe and level routes connecting the parking areas to the entrances of the establishments, exposing individuals to unsafe terrain or forcing them to use vehicular roadways to access the businesses.
- 121.3. Steps or uneven surfaces at entryways, preventing individuals using wheelchairs or mobility devices from entering the facilities without assistance.
- 121.4. Excessively high or improperly designed service counters that prevent individuals like V.R.R. and F.R.R. from communicating effectively with staff or completing transactions independently.
- 121.5. Obstructed or narrow interior and exterior pathways that limit maneuverability for those using mobility devices, including cluttered layouts or fixed furniture that does not allow adequate clearance.
- 121.6. Inaccessible dining or seating areas that lack appropriate table height, knee clearance, or spacing, preventing individuals using mobility devices from sitting comfortably or safely.
- 121.7. Restrooms that fail to comply with ADA standards, including:
  - 121.7.1. Doors that are too heavy or narrow for wheelchair users to operate or pass through independently.
  - 121.7.2. Lack of proper signage indicating the location of accessible restrooms.
  - 121.7.3. Absence of required grab bars in toilet stalls, creating unsafe conditions and increasing the risk of falls.
  - 121.7.4. Insufficient turning radius or poor layout that limits maneuverability inside restrooms.

121.7.5. Fixtures such as soap or towel dispensers placed at inaccessible heights, requiring physical strain to use.

122. These persistent violations have effectively denied V.R.R. and F.R.R. equal access to these public accommodations, depriving them of the fundamental right to fully participate in the economic and social life of their community. By being unable to safely enter these establishments, V.R.R. and F.R.R. are forced to make difficult decisions: risk their safety by navigating hazardous conditions such as inadequate ramps, steps at entrances, obstructed hallways, or inaccessible restrooms; or refrain from visiting these businesses altogether, even though they offer goods and services they need or wish to enjoy like any other citizen. This forced exclusion not only impacts their access to essential products and services but also denies them important everyday experiences for their personal development, social interaction, and sense of community belonging. The continuous exposure to unadapted spaces, or the constant need to rely on their father to overcome these barriers, reinforces feelings of frustration, vulnerability, and marginalization.
123. The Municipality of Arecibo has directly contributed to this discrimination by failing to enforce accessibility requirements or take action to ensure that businesses under its jurisdiction comply with the provisions of Title III of the ADA. Instead of acting as a guarantor of equal access rights, the Municipality has adopted a passive stance toward these violations, allowing establishments to operate for years with obvious architectural barriers without any consequences. Its systematic inaction and lack of oversight have perpetuated an exclusionary and unsafe environment for individuals with mobility impairments, including V.R.R. and F.R.R., who are trapped in a web of physical obstacles, institutional indifference, and lack of political will. This institutional



negligence not only prevents them from accessing goods and services on equal terms but also reinforces their social exclusion and undermines their dignity as human beings. As businesses continue to operate without adhering to accessibility laws and the Municipality fails to intervene, V.R.R. and F.R.R. continue to face unequal treatment, relegating them to the margins of their own community.

**H. Violations of Title II of the Americans with Disabilities Act (ADA) by the Municipality of Arecibo and the Commonwealth of Puerto Rico**

124. The Municipality of Arecibo and the Commonwealth of Puerto Rico have an affirmative legal duty to ensure that public sidewalks and ramps within their jurisdiction comply with accessibility requirements and remain free from barriers that obstruct individuals with mobility impairments. However, the Municipality of Arecibo and the Commonwealth of Puerto Rico have systematically failed to fulfill this obligation, thereby creating an unsafe, exclusionary, and discriminatory environment for individuals with disabilities, including V.R.R. and F.R.R. The ongoing neglect of the Municipality and the Commonwealth has resulted in widespread accessibility barriers, making it impossible for V.R.R. and F.R.R. to navigate their community safely and independently, in direct violation of the Americans with Disabilities Act (ADA).
125. The Municipality of Arecibo and the Commonwealth of Puerto Rico are directly responsible for the maintenance, repair, and regulation of sidewalks and ramps within their jurisdiction, including those surrounding public areas. This responsibility includes ensuring that the sidewalks and ramps remain accessible, free from hazardous defects, and compliant with the standards outlined in the 2023 Public Right-of-Way Accessibility Guidelines (PROWAG) and the Americans with Disabilities Act (ADA). However, the Municipality of Arecibo and the Commonwealth of Puerto Rico have failed to meet this

obligation, allowing cracked, uneven, obstructed, and poorly maintained sidewalks and ramps to persist, forcing V.R.R. and F.R.R. to navigate unsafe conditions, take dangerous alternative routes, or avoid these areas altogether.

126. Despite this legal obligation, the Municipality of Arecibo and the Commonwealth of Puerto Rico have allowed public sidewalks and ramps to remain in severe disrepair, with broken pavement, cracks, potholes, overgrown vegetation, and abrupt transitions that make them impassable for individuals using walkers or other mobility aids. The ongoing neglect of these essential infrastructure elements has created dangerous and exclusionary conditions, forcing V.R.R. and F.R.R. to take unsafe alternative routes or abandon their visits to certain locations altogether, in direct violation of the Americans with Disabilities Act (ADA).
127. The lack of enforcement and corrective action by the Municipality of Arecibo and the Commonwealth of Puerto Rico has subjected V.R.R. and F.R.R. to serious risks to their personal safety, dignity, and mobility. Due to the pervasive inaccessibility of sidewalks, they are frequently forced to take dangerous, unregulated detours, including moving onto the street, where they are directly exposed to vehicular traffic. This places them in immediate danger of being struck by moving vehicles and causes significant physical and emotional distress. Furthermore, the inconsistent and unsafe pedestrian routes prevent them from fully participating in essential daily activities, such as attending medical appointments, shopping, or engaging in recreational outings. The ongoing neglect of these critical accessibility issues by the Municipality of Arecibo and the Commonwealth of Puerto Rico has effectively excluded V.R.R. and F.R.R. from public life, violating their rights under the Americans with Disabilities Act (ADA).

128. The sidewalk and ramp system within the Municipality of Arecibo and the Commonwealth of Puerto Rico serves as an essential pedestrian route for V.R.R. and F.R.R. and other individuals with disabilities. However, due to the negligence of the Municipality and the Commonwealth, these routes have become completely unreliable and unsafe. The Municipality's and the Commonwealth's failure to repair and maintain the sidewalks and ramps has severely compromised connectivity and pedestrian flow, creating insurmountable obstacles for individuals who rely on mobility aids. As a result, V.R.R. and F.R.R. are frequently unable to access these areas safely and independently, further reinforcing their exclusion from spaces that should be fully accessible under the Americans with Disabilities Act (ADA).
129. By allowing these barriers to persist, the Municipality of Arecibo and the Commonwealth of Puerto Rico are in systematic violation of Title II of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12131 et seq., which mandates that public entities ensure accessibility and prohibit discrimination against individuals with disabilities in the provision of services, programs, and activities. The design, maintenance, and enforcement of accessibility standards for public sidewalks and ramps constitute a core municipal and Commonwealth responsibility under Title II. Therefore, the failure of the Municipality of Arecibo and the Commonwealth of Puerto Rico to implement and enforce accessibility regulations constitutes a pattern and practice of exclusion, depriving V.R.R. and F.R.R. and others with mobility disabilities of their right to full and equal access to public spaces. Their ongoing inaction has systematically denied individuals with disabilities safe and independent mobility, in direct violation of federal accessibility laws.

**I. Violation of Section 504 of the Rehabilitation Act by the Municipality of Arecibo and the Commonwealth of Puerto Rico**

130. Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, prohibits discrimination on the basis of disability in programs and activities that receive federal financial assistance. As recipients of federal funds, the Municipality of Arecibo and the Commonwealth of Puerto Rico have the legal obligation to ensure accessibility and prevent discrimination against individuals with disabilities in all services, programs, and activities under their jurisdiction, including the maintenance and regulation of public sidewalks, ramps, and pedestrian pathways. However, their continued failure to remove accessibility barriers and enforce compliance has resulted in the systematic exclusion of V.R.R. and F.R.R. and others with mobility impairments, in direct violation of Section 504. By neglecting their duty to provide accessible infrastructure, the Municipality of Arecibo and the Commonwealth of Puerto Rico have denied individuals with disabilities equal access to public spaces, further perpetuating unsafe and discriminatory conditions in violation of federal law.
131. Despite this clear legal obligation, the Municipality of Arecibo and the Commonwealth of Puerto Rico have engaged in systemic discrimination by failing to take affirmative actions to remove architectural barriers from their pedestrian infrastructure and by allowing sidewalks and ramps to be obstructed by vehicles. Their continued inaction and failure to enforce accessibility regulations have directly resulted in the exclusion of V.R.R. and F.R.R. from a fundamental public service—safe and accessible pedestrian pathways. As a result, V.R.R. and F.R.R. are frequently forced to take unsafe detours, navigate hazardous conditions, or avoid these areas altogether, depriving them of equal

access to public spaces in violation of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.

132. This failure constitutes a clear violation of Section 504 of the Rehabilitation Act and reflects intentional discrimination against V.R.R. and F.R.R. based on their mobility disability. The Municipality of Arecibo and the Commonwealth of Puerto Rico have been fully aware of the hazardous conditions of their sidewalks and ramps, including broken pavement, missing landing areas, potholes, cracks, and abrupt level changes, yet have failed to take corrective measures. Additionally, they have neglected to implement and enforce parking regulations, allowing vehicles to illegally obstruct designated pedestrian access points, ramps, and sidewalks, further restricting V.R.R. and F.R.R.'s ability to navigate their community safely and independently. This ongoing inaction has systematically denied them equal access to public spaces, violating both Section 504 and Title II of the Americans with Disabilities Act (ADA) and further perpetuating an environment of exclusion and discrimination.
133. By allowing these barriers to persist, the Municipality of Arecibo and the Commonwealth of Puerto Rico have effectively denied V.R.R. and F.R.R. the use and enjoyment of public spaces, in direct violation of Section 504 of the Rehabilitation Act. Their failure to ensure compliance with federal accessibility standards has forced V.R.R. and F.R.R. to either risk injury by navigating hazardous pedestrian routes or remain confined to their home, thereby depriving them of their right to participate in everyday community life on equal terms with others. This systemic inaction has resulted in the ongoing exclusion of individuals with mobility impairments, reinforcing discriminatory barriers that prevent full and independent participation in public life, in violation of federal law.

**K. Use Permits Granted in Violation of Accessibility Laws**

134. The Municipality of Arecibo has granted and maintained use permits for businesses within its jurisdiction, despite their failure to comply with accessibility laws. As a result, these establishments have been allowed to operate despite the existence of significant architectural barriers that prevent individuals with disabilities, such as V.R.R. and F.R.R., from accessing their facilities safely and independently. This institutionalized practice of non-compliance has resulted in the issuance of permits based on false or incomplete information, allowing the continued operation of businesses that do not meet the legal standards for accessibility.
135. Specifically, the businesses identified in this Complaint failed to meet accessibility requirements at the time of their permit applications and continue to operate in violation of the law, as follows:
- 135.1. In their use permit applications before the Municipality of Arecibo, the businesses falsely asserted that their establishments complied with accessibility laws, when in reality, the actual conditions of their facilities demonstrate otherwise.
- 135.2. Defendant businesses submitted permit applications containing materially false statements regarding accessibility compliance, specifically certifying ADA compliance while maintaining obvious barriers.
- 135.3. The businesses fraudulently certified that their establishments had accessible entrances and routes, yet they maintain permanent obstacles, such as damaged sidewalks, improperly designed curb ramps, and obstructed pathways, that prevent individuals with disabilities from safely accessing them.
- 135.4. In their permit applications, the businesses misrepresented that they provided the legally required maneuvering space for individuals using mobility aids, when the

actual space is significantly smaller than the minimum legal requirement, making it impossible for V.R.R. and F.R.R. to move freely.

135.5. The businesses concealed the fact that their service counters exceed the legally permitted height for accessibility, making them inadequate and unusable for individuals with mobility impairments, such as V.R.R. and F.R.R.

135.6. The permit applications falsely certified that the restroom facilities met accessibility requirements, yet in reality, these establishments lack sufficient maneuvering space, have improperly installed grab bars, and contain obstacles such as trash bins that further limit accessibility.

135.7. The businesses misrepresented compliance with accessible parking requirements, failing to provide the correct number of accessible spaces, and install proper signage and markings, creating additional barriers that prevent safe and independent access.

136. The Municipality of Arecibo has granted use permits without conducting proper inspections to verify compliance with accessibility laws, allowing these businesses to continue operating despite their failure to provide accessible entrances, paths of travel, parking, and service areas.

137. The Municipality of Arecibo has demonstrated a pattern of negligence in its duty to enforce accessibility laws. Rather than ensuring that the businesses comply with the law before issuing permits, the Municipality has:

137.1. Failed to conduct adequate inspections before granting use permits, allowing businesses with clear accessibility violations to continue operating despite the presence of architectural barriers.

- 137.2. After permit issuance, the Municipality failed to conduct any follow-up inspections despite receiving formal complaints about inaccessibility at several defendant establishments.
- 137.3. Ignored the poor condition of public sidewalks, curb ramps, and access routes, exacerbating the mobility barriers faced by V.R.R. and F.R.R.
- 137.4. Failed to implement penalties or fines against businesses that obstruct public sidewalks, fail to provide proper accessible parking, or operate without meeting basic accessibility standards, allowing non-compliant businesses to continue discriminating against individuals with mobility impairments.
- 137.5. Municipal officials conducted standard pre-approval site inspections where non-compliance would have been readily apparent to any reasonable inspector.
- 137.6. Despite visible non-compliance, municipal officials knowingly approved these applications and issued operating permits.
- 137.7. The Municipality received substantial permit fees, licensing fees, and ongoing business tax revenue from these businesses in exchange for non-enforcement of accessibility requirements.
- 137.8. The Municipality has issued zero citations for accessibility violations to any defendant business despite clear and ongoing non-compliance.
- 137.9. Municipal officials approved construction plans for several defendant businesses that explicitly depicted non-compliant features, including improper ramp designs and inadequate clearances.



138. Both municipal officials and business owners benefited financially from this arrangement – businesses avoided costly compliance modifications while the Municipality collected fees and taxes.
139. This coordinated action directly resulted in the creation and maintenance of architectural barriers throughout Arecibo that prevent plaintiffs from accessing public accommodations.
140. Not only has the Municipality of Arecibo granted use permits to the businesses without verifying compliance with accessibility laws, but it has also failed to implement enforcement mechanisms to correct these violations. The Municipality is fully aware that many of these businesses obstruct accessible routes and operate with significant architectural barriers, yet it has chosen not to take action to address these issues. This continued inaction has allowed widespread accessibility violations to persist, further excluding individuals with mobility impairments, including V.R.R. and F.R.R., from safely accessing these businesses and public spaces.
141. The number of enforcement actions or fines issued for sidewalk obstruction and accessibility violations is virtually nonexistent, reflecting a complete lack of commitment to ensuring compliance with accessibility laws. Instead of protecting the rights of individuals with disabilities, the Municipality of Arecibo has prioritized the convenience of businesses and drivers, allowing the continued misuse of public spaces at the expense of accessibility. This has had severe consequences for individuals like V.R.R. and F.R.R., who face immense difficulties navigating these areas safely.
142. The failure of the Municipality of Arecibo to regulate sidewalk use has resulted in accessible pedestrian routes being obstructed. As a consequence, V.R.R. and F.R.R. have

been forced to move onto the roadway, exposing themselves to unnecessary danger and increasing their risk of falls or collisions with vehicles. Instead of implementing measures to keep sidewalks clear and accessible, the Municipality of Arecibo has allowed these barriers to persist, creating an environment where accessibility is disregarded.

143. This ongoing failure to act constitutes a violation of V.R.R. and F.R.R.'s rights, as it directly impacts their freedom of movement, personal safety, and ability to participate in everyday activities. The lack of clear pedestrian routes and the obstruction of accessible pathways has made it physically exhausting and dangerous for them to navigate the city, discouraging them from visiting locations within Arecibo due to the fear of encountering accessibility barriers that will make their visit impossible.
144. The businesses identified in this Complaint, maintain private parking lots designated for their customers. However, at the time of obtaining their use permits —and continuing to this day— these businesses have failed to provide the legally required accessible parking spaces, creating further obstacles for individuals like V.R.R. and F.R.R., who require safe and accessible parking near entrances to navigate these establishments independently and without risk.
145. Despite operating parking facilities for their customers, the businesses have failed to comply with state and federal accessibility requirements, leading to the following violations:
  - 145.1. The parking lots lack the proper number of designated accessible parking spaces, making it difficult for individuals like Mr. Ramón and his children, V.R.R. and F.R.R., to park safely and conveniently near the entrances.

- 145.2. The accessible parking spaces are poorly marked, with faded paint and inadequate signage, making it difficult for individuals like Mr. Ramón and his children to identify the designated spaces.
- 145.3. The route from the parking lot to the main entrance is obstructed by obstacles, hindering the mobility of individuals like Mr. Ramón and his children, who rely on mobility devices.
- 146. Not only has the Municipality of Arecibo allowed these businesses to operate without meeting accessibility standards, but it has also failed to implement enforcement mechanisms to correct these deficiencies. Despite being fully aware of the ongoing violations, the Municipality of Arecibo has neglected to:
  - 146.1. Conduct proper inspections to ensure compliance with accessibility laws before granting use permits.
  - 146.2. Impose corrective measures on businesses that fail to meet accessibility requirements.
  - 146.3. Enforce penalties or fines on establishments that continue to operate with inaccessible parking facilities.
  - 146.4. Address the poor condition of public sidewalks and curb ramps surrounding these businesses, further exacerbating accessibility barriers for individuals like V.R.R. and F.R.R.
- 147. Due to these violations, Mr. Ramón and his children, V.R.R. and F.R.R., have been directly impacted, facing numerous obstacles when attempting to park and access these establishments. On several occasions, they have been forced to leave, attempt to return

later, or seek an alternative location, leading to additional transportation costs, wasted time, and unnecessary physical strain.

148. Furthermore, the lack of accessible parking and clear pedestrian routes has made each visit physically exhausting and frustrating, discouraging Mr. Ramón and V.R.R. and F.R.R. from returning to these locations. Instead of being able to enjoy outings and participate in daily activities like any other citizen, they are forced to navigate an environment that continuously excludes individuals with disabilities.
149. The use permits granted to the businesses identified in this Complaint are null and void, as they were obtained based on false or incomplete information regarding accessibility compliance. These businesses failed to disclose material information about existing architectural barriers, and the Municipality of Arecibo failed in its duty to verify compliance before issuing permits.
150. Therefore, the plaintiff respectfully requests that the Court, after completing the requisite procedural steps, order the immediate revocation of these use permits and mandate the correction of all existing accessibility barriers within and around the businesses' establishments. Additionally, the Municipality of Arecibo must be required to implement proper oversight and enforcement mechanisms to ensure that all public accommodations comply with accessibility laws, thereby preventing further discrimination against individuals with disabilities, including Mr. Ramón and V.R.R. and F.R.R.

### **III. CONCLUSION AND PRAYER FOR RELIEF**

After thorough documentation of the persistent and pervasive accessibility barriers throughout the Municipality of Arecibo, we respectfully submit this conclusion detailing the specific relief requested from each defendant. The systematic discrimination experienced by

V.R.R. and F.R.R. requires comprehensive remediation through court intervention to ensure their civil rights are protected and their dignity preserved.

**WHEREFORE**, the plaintiff, Ramon Rivera on behalf of his children V.R.R. and F.R.R., respectfully requests that this Honorable Court grant the following legal remedies:

**I. Remedies Requested From the Commonwealth of Puerto Rico**

The Commonwealth of Puerto Rico bears significant responsibility for ensuring accessibility throughout Puerto Rico's public infrastructure. Therefore, we request the Court to order the Commonwealth to:

1. Repair and maintain all sidewalks, curb ramps, and pedestrian pathways along State Highways, eliminating cracks, uneven surfaces, and other hazards that prevent safe navigation by individuals using wheelchairs.
2. Install proper curb ramps at all intersections along state-managed roadways in Arecibo, ensuring they meet the requirements set forth in the 2023 Public Right-of-Way Accessibility Guidelines (PROWAG).
3. Enforce parking regulations to prevent vehicles from obstructing sidewalks, curb ramps, and other pedestrian pathways along state-managed roadways.
4. Develop and implement a comprehensive Transition Plan that identifies all accessibility barriers on state-managed infrastructure in Arecibo, establishes clear timelines for remediation, and allocates sufficient resources for prompt completion.
5. Designate a qualified ADA Coordinator to oversee compliance efforts and establish an effective grievance procedure for addressing accessibility complaints.
6. Provide mandatory training on ADA requirements for all employees involved in the design, construction, maintenance, and regulation of public infrastructure.

7. For the violations of Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, V.R.R. and F.R.R. seek nominal damages of \$1.00 each from the Commonwealth of Puerto Rico and the Municipality of Arecibo. These nominal damages, while modest in amount, serve the crucial legal purpose of acknowledging the violation of V.R.R. and F.R.R.'s federally protected civil rights. Additionally, V.R.R. and F.R.R. seek compensatory damages of \$1.00 for the increased fuel consumption and vehicle maintenance costs they have incurred each time they have been forced to rely on motorized transportation to access locations that they could have reached independently had the defendants maintained accessible sidewalks as required by law. These damages, though symbolic in amount, recognize the tangible financial burden imposed on V.R.R. and F.R.R. by the defendants' failure to provide accessible pedestrian routes throughout Arecibo, compelling them to depend on vehicular transport for even short distances that could otherwise be traversed in their wheelchairs.

## **II. Remedies Requested From the Municipality of Arecibo**

As the local government responsible for ensuring accessibility within its jurisdiction, we request the Court to order the Municipality of Arecibo to:

1. Repair and maintain all municipal sidewalks, ramps, and pedestrian pathways throughout the Municipality of Arecibo, eliminating all barriers that prevent Ramon Rivera on behalf of his children V.R.R. and F.R.R. from safely navigating their community.
2. Enforce parking regulations to prevent vehicles from illegally parking in front of the sidewalks or blocking the ramps, implementing sufficient penalties to deter such violations.

3. Revoke the use permits of all businesses that obtained them through misrepresentation of accessibility compliance, requiring new inspections before reinstatement.
4. Implement a certification program requiring that all new construction, alterations, or repairs to the Public Sidewalk System be inspected and certified by independent licensed subject matter experts.
5. Establish an accessible barrier reporting system with multiple reporting methods and mandatory response timelines.
6. Allocate a specific percentage of the annual municipal budget to accessibility improvements.
7. Develop and maintain a public-facing website documenting barriers, remediation plans, and progress.
8. For the violations of Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, Ramon Rivera on behalf of his children V.R.R. and F.R.R. seeks nominal damages of \$1.00 each from the Municipality of Arecibo. These nominal damages, while modest in amount, serve the crucial legal purpose of acknowledging the violation of their federally protected civil rights. Additionally, Ramon Rivera on behalf of his children V.R.R. and F.R.R. seeks compensatory damages of \$1.00 for the increased fuel consumption and vehicle maintenance costs incurred each time they have been forced to rely on motorized transportation to access locations that they could have reached independently had the Municipality of Arecibo maintained accessible sidewalks as required by law. These damages, though symbolic in amount, recognize the tangible financial burden imposed by the failure of the Municipality of Arecibo to provide

accessible pedestrian routes, compelling them to depend on vehicular transport for even short distances that could otherwise be traversed in a wheelchair.

**III. Remedies Requested From the Corporations with Public Accommodation Locations Located in the Municipality of Arecibo**

**A. Empresas Rodriguez Inc. (Panadería My Sweet Bakery)**

We request that Empresas Rodriguez Inc. be ordered to:

1. Reconstruct the main entrance ramp to meet ADA guidelines, including a reduced incline, a smooth and crack-free surface, and proper color-contrasted edge markings for safety.
2. Rearrange interior furniture and other elements to ensure sufficient circulation space for individuals using mobility aids, allowing clear, unobstructed paths of at least 36 inches.
3. Replace existing tables with accessible models that provide adequate knee and toe clearance, removing or redesigning any under-table bars that prevent close access for users of mobility devices.
4. Lower all service counters to a maximum height of 36 inches and ensure at least one portion of the counter is fully accessible for seated individuals.
5. Modify counter design to include proper front clearance, allowing individuals using mobility devices to position themselves comfortably and interact with staff independently.
6. Install appropriate accessible signage at restroom entrances, including the international symbol of accessibility.



7. Relocate or replace the restroom toilet flush mechanism so that it is easily reachable from a seated position and complies with ADA reach range requirements.
8. Install properly positioned side and rear grab bars in the restroom to ensure safety and stability for users with mobility impairments.
9. Lower and reposition soap and paper towel dispensers to an accessible height within ADA reach range (typically 15 to 48 inches from the floor).
10. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**B. Farmacia Del Carmen LLC (Farmacia Del Carmen)**

We request that Farmacia del Carmen LLC be ordered to:

1. Install proper accessible parking signage, including the international symbol of accessibility, to clearly designate the space reserved for individuals with reduced mobility.
2. Repaint and maintain the accessible parking area to ensure visibility and prevent improper use by unauthorized vehicles.
3. Create an accessible route from the parking lot to the main entrance by removing physical obstructions (such as poles and metal bars), and installing a properly designed ramp where necessary.
4. Widen the entrance door to meet ADA standards, allowing individuals using mobility devices to enter without restriction or discomfort.

5. Lower all interior counters, including general service counters, to a maximum height of 36 inches.
6. Modify the medication pickup and delivery counter to include an accessible section with a lower height and adequate front clearance.
7. Level the restroom entrance flooring and install a proper threshold ramp if needed.
8. Install universal accessibility signage at the entrance of the restroom to clearly identify its suitability for individuals with disabilities.
9. Replace the existing restroom sink with a wall-mounted accessible model that provides adequate front clearance, removing any base that obstructs access for individuals using mobility aids.
10. Reposition the toilet flush button to an accessible location within ADA reach range, ensuring it can be used independently from a seated position.
11. Install a properly positioned rear grab bar behind the toilet in the restroom.
12. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**C. Gasrico Corporation (Rico Gas)**

We request that Gasrico Corporation be ordered to:

1. Design and implement an accessible parking area within the existing parking lot, including at least one properly marked space with appropriate signage and access aisles, in compliance with ADA standards.

2. Install visible and permanent signage identifying the accessible parking space using the international symbol of accessibility.
3. Create a continuous, unobstructed, and accessible route from the accessible parking area to the main entrance of the establishment, including the removal of any barriers and the installation of ramps or curb cuts as necessary.
4. Ensure that all accessible paths comply with ADA guidelines in terms of slope, width, surface condition, and safety.
5. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**D. Buona Restaurants LLC (Antoninos Pizza-Arecibo)**

We request that Buona Restaurants LLC be ordered to:

1. Implement measures to ensure that parking spaces do not obstruct pedestrian traffic on the sidewalk, by clearly marking areas to prevent vehicles from parking on the sidewalk and ensuring that access to the sidewalk remains unobstructed for individuals using mobility devices.
2. Designate an accessible parking with properly marked spaces, signage, and access aisles.
3. Repair parking lot hazards (cracks, uneven surfaces).
4. Keep entrance ramp clear and marked as no-parking zone.
5. Modify entrance door (lower handle, reverse swing or install automatic opener).
6. Apply non-slip treatment to existing flooring.
7. Lower service counters for wheelchair access.

8. Replace tables with wheelchair-accessible designs.
9. Widen bathroom doors to allow wheelchair passage.
10. The removal of all the barriers indicated for this corporation in Section D of this Complaint is requested.
11. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**E. Paradise B.B.Q. Inc. (Paradise B.B.Q. Inc.)**

We request that Paradise B.B.Q. Inc. be ordered to:

1. Repair the deteriorated and uneven pavement in the parking area to ensure a smooth and accessible surface for individuals using mobility devices.
2. Remove or replace the brown carpet at the entrance door with a firm, slip-resistant surface that does not obstruct wheelchair movement.
3. Lower a section of the buffet counter to an accessible height.
4. Extend the buffet counter depth to allow wheelchair users to get closer and serve themselves comfortably.
5. Remove the gray metal bars obstructing access to the buffet counter to ensure unrestricted maneuverability for wheelchair users.
6. Rearrange tables and seating to provide at least 32 inches of clearance in passageways for improved maneuverability.
7. Modify tables by removing or repositioning black support bars underneath to increase legroom for wheelchair users.

8. The removal of all the barriers indicated for this corporation in Section D of this Complaint is requested.
9. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**F. Adorno's Bakery, Corporación (Adorno's Bakery Corporation)**

We request that Adorno's Bakery, Corporación be ordered to:

1. Demarcate a clear and visible accessible route to the entrance.
2. Lower the display cases to allow wheelchair users to see and select items independently.
3. Lower a portion of the brown counter to an accessible height for placing orders and receiving items.
4. Extend the depth of the brown counter to provide sufficient space for customers using wheelchairs to place their food and drinks securely.
5. Modify tables by removing or repositioning support bars underneath to allow wheelchair users to sit comfortably.
6. Rearrange tables and seating to provide at least 32 inches of clearance in passageways for improved maneuverability.
7. The removal of all the barriers indicated for this corporation in Section D of this Complaint is requested.
8. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have

conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**G. Marilyn's Restaurant Inc. (Marilyn's Restaurant)**

We request that Marilyn's Restaurant Inc. be ordered to:

1. Designate and properly mark accessible parking spaces with the International Symbol of Accessibility to accommodate wheelchair users.
2. Create a dedicated passenger loading zone adjacent to the entrance that provides sufficient space to safely deploy wheelchair ramps from vehicles.
3. Resurface the parking lot to eliminate cracks and create a smooth, stable surface for safe wheelchair navigation.
4. Lower a portion of the service counter to an accessible height that allows wheelchair users to independently interact with staff.
5. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
6. Pay compensatory and nominal damages to V.R.R. and F.R.R. for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**H. Tima Corp. (Poco Loco Arecibo)**

We request that Tima Corp. be ordered to:

1. Implement an accessible entrance by removing the rug currently obstructing the main entrance of the restaurant.

2. Rearrange the tables and chairs in the restaurant to create a clear, accessible circulation space.
3. Lower the customer service counter to a height that is accessible to individuals using mobility devices, such as the convoys of V.R.R. and F.R.R.
4. Provide an accessible front space at the counter, ensuring that the area in front of the customer service counter is free of obstacles, such as the row of chairs that currently obstructs the path.
5. Implement internationally recognized accessibility signage to identify the adapted restroom.
6. Expand the bathroom space by removing obstructing elements such as trash baskets and reconfiguring the layout to provide adequate maneuverability for mobility devices.
7. Replace the excessively heavy bathroom doors with lighter alternatives that include easy-opening mechanisms.
8. Relocate the toilet flush buttons from their current inaccessible position on the closed section of the wall to an easily reachable location.
9. Redesign restaurant tables to eliminate the central support bar in the lower area that currently prevents individuals using mobility devices.
10. The removal of all the barriers indicated for this corporation in Section D of this Complaint is requested.
11. Pay compensatory and nominal damages to, V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have

conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**I. NGP Caribe LLC (La Guira Restaurant & Lounge)**

We request that NGP Caribe LLC be ordered to:

1. Rearrange the placement of outdoor tables near the entrance to provide a clear and direct path to the main door.
2. Lower a section of the gray customer service counter to an accessible height.
3. Extend the depth of the gray customer service counter to allow wheelchair users to place and retrieve items comfortably.
4. Rearrange tables and seating to provide at least 32 inches of clearance in passageways for improved maneuverability.
5. Modify tables by removing or repositioning support bars underneath to increase legroom for wheelchair users.
6. The removal of all the barriers indicated for this corporation in Section D of this Complaint is requested.
7. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**J. Tony's Cafe LLC (Adis)**

We request that Tony's Cafe LLC be ordered to:



1. Repair the deteriorated sidewalk in front of the establishment by eliminating cracks, potholes, and weeds to create a uniform, stable, and safe surface for mobility devices.
2. Renovate the access ramp connecting the sidewalk to the main entrance.
3. Widen the main entrance door to ensure sufficient dimensions for the comfortable passage of mobility devices without requiring complicated maneuvers.
4. Rearrange tables and chairs to create wider circulation paths throughout the establishment.
5. Replace existing tables with models that do not have structural bars in the lower area.
6. Lower the service and transaction counters to an accessible height that facilitates direct interaction for customers using mobility devices.
7. Remove the row of chairs and other obstacles in front of service counters to create clear, accessible front space.
8. Replace the excessively high chairs with alternatives of appropriate height.
9. Install clear, visible signage using universal accessibility symbols to indicate the location of accessible bathrooms within the establishment.
10. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**K. NGP Caribe LLC (Arasibo Steak House)**

We request that NGP Caribe LLC be ordered to:

1. Remove the table bases that block access, allowing the children, V.R.R. and F.R.R., to approach the tables from all sides.
2. Lower the bar counter to a height accessible to individuals using mobility devices, such as the convoys of V.R.R. and F.R.R.
3. Increase the counter depth to allow a proper frontal approach for individuals using mobility devices.
4. Create an accessible route inside the establishment, allowing the children, V.R.R. and F.R.R., to move freely within the premises.
5. Remove the row of chairs blocking access to the counter, ensuring unobstructed interaction with staff.
6. Replace high chairs in front of the counter with accessible seating for individuals with mobility impairments.
7. Ensure full compliance with all accessibility standards to make the establishment inclusive for individuals with mobility challenges.
8. We request the removal of all barriers indicated for this corporation in Section D of this Complaint.
9. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**L. Caribbean Wraps Inc Inc. (Caribe Wraps)**

We request that Caribbean Wraps Inc Inc. be ordered to:

1. Lower the customer service counter to an accessible height for individuals using mobility devices, such as the convoys of V.R.R. and F.R.R., ensuring they can independently interact with staff and make transactions.
2. Increase the depth of the customer service counter to allow for a proper frontal approach, enabling V.R.R. and F.R.R. to get close enough to interact with staff and make purchases comfortably.
3. Ensure full compliance with all accessibility standards to make the establishment inclusive and accessible for individuals with mobility challenges.
4. We request the removal of all barriers indicated for this corporation in Section D of this Complaint.
5. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**M. Supermercados Hatillo, Inc (Hatillo Kash N' Karry)**

We request that Hatillo Kash N' Karry be ordered to:

1. Reorganize the product displays to ensure they are not located in the middle of the aisles, creating wide and clear paths for wheelchair users.
2. Increase the space between the cash registers to provide enough room for wheelchair users and their companions, allowing them to complete their transactions comfortably.
3. Remove the stacked cardboard boxes in the aisles and reorganize the store layout to ensure clear visibility and safe passage for all customers.

4. Rearrange the aisles to ensure there is enough space for individuals with mobility impairments to navigate easily.
5. Ensure the store layout allows for a smooth, independent shopping experience for customers with mobility challenges, addressing all the barriers identified in this complaint.
6. We request the removal of all barriers indicated for this corporation in Section D of this Complaint.
7. Pay compensatory and nominal damages to, V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if it is determined that they conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**N. King China Restaurant L.L.C. (King China Restaurant LLC)**

We request that King China Restaurant L.L.C. be ordered to:

1. Repair the damaged pavement in the parking lot to provide a smooth and accessible surface for wheelchair users.
2. Designate at least one accessible parking space that meets ADA requirements, including proper dimensions, adjacent access aisle, and appropriate signage for individuals with mobility disabilities.
3. Fix the access route from the parking lot to the entrance by eliminating cracks and leveling the pavement to ensure safe passage.
4. Remove or replace the black mat at the entrance with a surface that does not obstruct wheelchair movement.

5. Lower a section of the customer service counter to an accessible height, allowing wheelchair users to interact with staff and complete transactions independently.
6. Extend the depth of the customer service counter to provide enough space for customers using wheelchairs to place their food and drinks securely.
7. Rearrange tables and seating inside the restaurant to provide at least 32 inches of clearance in passageways, ensuring wheelchair users can navigate freely.
8. The removal of all the barriers indicated for this corporation in Section D of this Complaint is requested.
9. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**O. Johannas Pizza Y Algo Mas Corp. (Johannas Pizza Y Algo Mas Corp)**

We request that Johannas Pizza Y Algo Más Corp. be ordered to:

1. Implement measures to ensure that parking spaces do not obstruct pedestrian traffic on the sidewalk, by clearly marking areas to prevent vehicles from parking on the sidewalk and ensuring that access to the sidewalk remains unobstructed for individuals using mobility devices.
2. Repair the worn and uneven parking lot pavement to provide a smooth and accessible surface for wheelchair users.
3. Designate accessible parking spaces with proper vertical signage displaying the universal disability symbol to ensure availability and prevent misuse by other drivers.

4. Establish a clear and accessible route from the parking lot to the entrance, eliminating obstacles and ensuring a stable surface for wheelchair users.
5. Lower a section of the order counter to an accessible height, allowing wheelchair users to place orders and communicate with staff independently.
6. Extend the depth of the order counter to provide sufficient space for customers using wheelchairs to place and retrieve items securely.
7. Rearrange tables to create adequate clearance for wheelchair users to navigate comfortably, ensuring at least 32 inches of clearance in passageways.
8. Replace or modify tables with lower support bars to allow wheelchair users to position themselves comfortably without obstruction.
9. The removal of all the barriers indicated for this corporation in Section D of this Complaint is requested.
10. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

**P. George's BBQ LLC (George's BBQ)**

We request that George's BBQ LLC be ordered to:

1. Install proper signage in the parking lot to clearly identify an accessible space for people with reduced mobility.
2. Create an accessible route from the parking lot to the main entrance of the establishment.

3. Correct the ramp connecting the parking lot to the main entrance by adjusting its inclination to meet proper accessibility standards.
4. Remove the rug blocking the entrance to the establishment.
5. Rearrange the tables and chairs inside the establishment to create sufficient circulation space for individuals using mobility devices.
6. Pay compensatory and nominal damages to V.R.R. and F.R.R., for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired and actively cooperated with public entities to cause the outcomes described herein, particularly the unlawful acquisition of use permits.

#### **IV. General Relief**

In addition to the specific relief requested from each defendant, we further request that this Honorable Court:

1. Issue a declaratory judgment that all defendants have violated applicable provisions of the Americans with Disabilities Act (ADA) and, where applicable, Section 504 of the Rehabilitation Act.
2. Establish Court oversight through a court-appointed monitor to ensure timely compliance with all ordered remedies.
3. Award reasonable attorneys' fees, litigation expenses, and costs pursuant to applicable federal and Puerto Rico law.
4. Retain jurisdiction over this matter to ensure implementation of all ordered remedies.

This comprehensive relief will ensure that V.R.R. and F.R.R.'s civil rights are protected and that they can enjoy full and equal access to public accommodations and services to which

they are legally entitled. The requested remedies aim not only to address the specific barriers they face but to create a more inclusive and accessible community for all residents and visitors with disabilities in the Municipality of Arecibo.

**Dated:** April 1, 2025.

**RESPECTFULLY SUBMITTED.**

**VELEZ LAW GROUP LLC**  
Civil Rights Division

s/José Carlos Vélez Colón  
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**PLAINTIFF'S ATTORNEY**