

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

DALIA VÁZQUEZ AGUIÑAGA

Plaintiff

v.

CIVIL NO.

COMMONWEALTH OF PUERTO RICO; MUNICIPALITY OF DORADO; INTERSERVICE GROUP, INC.; INNOVA UP GROUP LLC; ALWAYS FRESH LLC; APOLINAR LLC; PLAZA DORADA, INC.; APPLE CARIBE, INC.; METROPOL DORADO, INC.; BRODERSEN ENTERPRISES OF PUERTO RICO, INC.; DORADO SHOPPING CENTER DEVELOPMENT CORP.; EL MESON DE FELIPE, INC.; MULTISYSTEMS RESTAURANTS, INC.; 2 THE MOON LLC; LATIN AMERICAN SUBS, LLC; PEDRO MALDONADO FRAPPE'S LLC; THE YELLOW DOOR COFFEE & ICE CREAM SHOP LLC; HSC DORADO LLC; DE HOLDINGS LLC; ANCAREM LLC; LOS PACHANGOSOS LLC; DORADO TIERRAMAR CORPORATION; LULA' S BURGER CORPORACIÓN; MELOLAIKA BURGUER LLC; EL CABALLIN DORADO CORP.; KARASU LLC; KATRINA, INC.; BRO PR LLC; ZACARIAS-NAVARRO LLC; LANDY, INC.; THE PIZZA BOY CORP.; RONDO, INC.; GOLDO'S BARBECUE CORP.; GREEN BITES CORP.; BLOOMING CUP CORPORACIÓN; DIPEA WINGS LLC

Defendant

COMPLAINT

TO THE HONORABLE COURT:

The Plaintiff, Dalia Vázquez Aguiñaga (hereinafter “plaintiff”, “Mrs. Dalia” or “Mrs. Vázquez”), on behalf of their own interests, respectfully requests a Permanent Injunction against Commonwealth Of Puerto Rico and Municipality of Dorado 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 Interservice Group, Inc.; Innova Up Group LLC; Always Fresh LLC; Apolinar LLC; Plaza Dorada, Inc.; Apple Caribe , Inc.; Metropol Dorado, Inc.; Brodersen Enterprises Of Puerto Rico, Inc.; Dorado Shopping Center Development Corp.; El Meson De Felipe, Inc.; Multisystems Restaurants, Inc.; 2 The Moon LLC; Latin American Subs, LLC; Pedro Maldonado Frappe's LLC; The Yellow Door Coffee & Ice Cream Shop LLC; HSC Dorado LLC; De Holdings LLC; Ancarem LLC; Los Pachangosos LLC; Dorado Tierramar Corporation; Lula' S Burger Corporación; Melolaika Burguer LLC; El Caballin Dorado Corp.; Karasu LLC; Katrina, Inc.; BRO PR LLC; Zacarias-Navarro LLC; Landy, Inc.; The Pizza Boy Corp.; Rondo, Inc.; Goldo's Barbecue Corp.; Green Bites Corp.; Blooming Cup Corporación; Dipea Wings LLC in accordance with Title III of the *Americans with Disabilities Act*.

I. INTRODUCTION

1. In the heart of Dorado, Puerto Rico, a municipality renowned for its beauty and vibrant community life, there exists an invisible wall—a barrier not of brick and mortar, but of cracked sidewalks, inaccessible entrances, and institutional indifference. This complaint lays bare the systematic exclusion of Mrs. Dalia Vázquez, a quadriplegic resident who has been effectively banished from full participation in her own community due to pervasive accessibility barriers that transform ordinary activities into insurmountable challenges.
2. The Americans with Disabilities Act was enacted in 1990 with a simple yet profound promise: to ensure that people with disabilities would no longer be relegated to second-class

citizenship. Yet more than three decades later, this case presents a stark portrait of how that promise remains unfulfilled in Dorado. Mrs. Vázquez faces a hostile urban landscape where sidewalks end abruptly or crumble beneath her wheelchair, where restaurants position tables too close together for her to navigate, where counters tower beyond her reach, and where public restrooms remain inaccessible fortresses. These are not mere inconveniences—they are discriminatory barriers that effectively communicate a message: "You are not welcome here."

3. "Injustice anywhere is a threat to justice everywhere," wrote Dr. Martin Luther King Jr. in his Letter from Birmingham Jail. For Mrs. Vázquez, injustice is not an abstract concept but a daily reality manifested in every cracked sidewalk she cannot traverse, every restaurant she cannot enter, and every counter she cannot reach. The disability rights movement has long recognized that accessibility is not charity but a fundamental civil right—a truth eloquently captured by disability rights activist Judy Heumann when she stated, "Disability only becomes a tragedy when society fails to provide the things we need to lead our lives."
4. The Commonwealth of Puerto Rico and the Municipality of Dorado have abdicated their legal responsibility to maintain accessible public infrastructure, allowing sidewalks to deteriorate and permitting businesses to operate with blatant accessibility violations. The co-defendant businesses named in this complaint—from shopping centers to restaurants, from coffee shops to retail establishments—continue to operate with architectural barriers that exclude Mrs. Vázquez and others with mobility impairments, their use permits granted and maintained by a municipality that has systematically failed to enforce the very laws designed to prevent such exclusion.
5. This complaint meticulously documents the barriers Mrs. Vázquez encounters across forty establishments in Dorado—barriers that transform what should be enjoyable experiences into exercises in frustration and humiliation. It details counters too high for her to reach, entrances she cannot navigate, restrooms she cannot use, and tables she cannot approach. It chronicles

sidewalks so badly damaged that they force her to risk her safety by traveling in streets alongside vehicular traffic. It exposes a pattern where public sidewalks are routinely blocked by illegally parked vehicles, with authorities turning a blind eye to these violations.

6. What emerges is not a picture of isolated oversights but of systemic, institutional neglect—a collective failure by both public and private entities to fulfill their legal obligations under the Americans with Disabilities Act and the Rehabilitation Act. This failure reveals a disturbing indifference to the rights and dignity of citizens with disabilities, effectively creating a segregated community where full participation is reserved for the able-bodied.
7. The remedies sought are not extraordinary but basic: sidewalks that are navigable, entrances that are accessible, counters that are reachable, and restrooms that are usable. Yet achieving these basic accommodations will require a fundamental shift in how both public and private entities approach their legal and moral obligations to citizens with disabilities. It will require the Municipality of Dorado and the Commonwealth of Puerto Rico to embrace their responsibility to maintain accessible public infrastructure. It will require businesses to recognize that accessibility is not an optional amenity but a civil rights requirement. And it will require this Court to affirm that the promise of the ADA remains as vital and binding today as when it was enacted.
8. As disability rights advocate Ed Roberts powerfully stated, "When others see a person with a disability, they see the disability first and the person second. When we see ourselves, we see people first." This complaint asks the Court to see Mrs. Vázquez as she sees herself—not as a wheelchair user to be accommodated as a matter of charity, but as a citizen entitled to the same rights, opportunities, and dignity as every other resident of Dorado. It asks the Court to recognize that when a community effectively excludes its citizens with disabilities, it diminishes not only their lives but its own character and integrity.

9. The barriers documented in this complaint are not immutable facts of nature but manifestations of choices—choices to neglect infrastructure, to prioritize convenience over accessibility, and to treat compliance with disability rights laws as optional. Different choices are possible, and through the remedies sought in this complaint, a different and more inclusive Dorado can emerge—one where Mrs. Vázquez and all citizens with disabilities can participate fully in community life with dignity and independence.
10. For Mrs. Vázquez, this case is not about abstract principles but about concrete realities: her ability to dine at a restaurant, shop at a store, or simply move through her community without confronting barriers that others never need to consider. It is about her right to experience the simple pleasures that most take for granted—enjoying a meal with friends, browsing in a shop, or taking a stroll through town—without being excluded by design or neglect.
11. This complaint stands as both an indictment of present failures and a blueprint for future compliance. It calls upon this Court to affirm that the promises of the ADA and the Rehabilitation Act are not aspirational but mandatory, and that the rights of citizens with disabilities are not negotiable but fundamental. In doing so, it seeks not special treatment for Mrs. Vázquez but equal justice—the recognition that her right to participate fully in community life warrants the same protection as any other civil right in our constitutional order.

II. PARTIES

12. The Plaintiff Dalia Vazquez Aguiñaga is a resident of the Municipality of Dorado.
13. 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 State Highway #693.
14. The co-defendant, Municipality of Dorado, is a municipal entity with the 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 locations situated within the Municipality of Dorado. Additionally, the Municipality of Dorado is one of the co-defendants, as it is the public entity that issued use permits to the corporate co-defendants in this complaint, despite their failure to maintain accessible facilities on their respective properties, as outlined in Section C.

15. The following co-defendants represent the respective businesses they own, lease, rent, or operate, located within the Municipality of Dorado.

15.1. Interservice Group, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Mahi Mahi Shopping Village. Additionally, Interservice Group, Inc. is the owner and lessor of the various businesses operating within Mahi Mahi Shopping Village, which include:

15.1.1. Innova Up Group LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Al Pan Pan.

15.1.2. Always Fresh LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Go Fresh.

15.1.3. Apolinar LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as La Hacienda Meat Center.

15.2. Plaza Dorada, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Plaza Dorada Shopping Center. Additionally, Plaza Dorada, Inc. is the owner and lessor of the various businesses operating within Plaza Dorada Shopping Center, which include:

15.2.1. Apple Caribe, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Applebee's Grill + Bar.

15.2.2. Metropol Dorado, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Metropol Dorado.

- 15.2.3. Brodersen Enterprises Of Puerto Rico, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Popeyes - Dorado.
- 15.3. Dorado Shopping Center Development Corp. is the owner, lessor, lessee, and/or operator of the public accommodation known as Doramar Plaza. Additionally, Dorado Shopping Center Development Corp. is the owner and lessor of the various businesses operating within Doramar Plaza, which include:
 - 15.3.1. El Meson De Felipe, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as El Meson Sandwiches.
 - 15.3.2. Multisystems Restaurants, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Sizzler Rest Dorado.
 - 15.3.3. 2 The Moon LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Taco Maker.
- 15.4. Dorado Shopping Center Development Corp. is the owner, lessor, lessee, and/or operator of the public accommodation known as Dorado del Mar Shopping Center.
 - 15.4.1. Latin American Subs, LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Firehouse Subs.
 - 15.4.2. Pedro Maldonado Frappe's LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Sabor Frappe.
 - 15.4.3. The Yellow Door Coffee & Ice Cream Shop LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as The Yellow Door Coffee & Ice Cream Shop.
- 15.5. HSC Dorado LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Café Cuatro Sombras.

- 15.6. De Holdings LLC is the owner, lessor, lessee, and/or operator of the public accommodations known as Embassy Suites Hotel Dorado Del Mar Beach Resort and the public accommodations known as New York Grill And Steakhouse.
- 15.7. Ancarem LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Kikita Beach House.
- 15.8. Los Pachangosos LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as La Pachanga.
- 15.9. Dorado Tierramar Corporation is the owner, lessor, lessee, and/or operator of the public accommodation known as La Terraza.
- 15.10. Lula' S Burger Corporación is the owner, lessor, lessee, and/or operator of the public accommodation known as Lula's Burger.
- 15.11. Melolaika Burguer LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Melolaika Burguer.
- 15.12. El Caballin Dorado Corp. is the owner, lessor, lessee, and/or operator of the public accommodation known as Pirilo Pizza Rústica – Dorado.
- 15.13. Karasu LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Punto Plena Bakery.
- 15.14. Katrina, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Katrina.
- 15.15. BRO PR LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Tres Palos Bar and Grill.
- 15.16. Zacarias-Navarro LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Rombo Asador Playero.
- 15.17. Landy, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as The Beer Shop.

- 15.18. The Pizza Boy Corp. is the owner, lessor, lessee, and/or operator of the public accommodation known as The Pizza Boy.
- 15.19. Rondo, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Villa Dorada D'Alberto.
- 15.20. Rondo, Inc. is the owner, lessor, lessee, and/or operator of the public accommodation known as Villa Dorada Sport Bar And Grill.
- 15.21. Goldo's Barbecue Corp. is the owner, lessor, lessee, and/or operator of the public accommodation known as Don Tako Cantina Mexicana.
- 15.22. Green Bites Corp. is the owner, lessor, lessee, and/or operator of the public accommodation known as Green Bites.
- 15.23. Blooming Cup Corporación is the owner, lessor, lessee, and/or operator of the public accommodation known as Blooming Cup.
- 15.24. Dipea Wings LLC is the owner, lessor, lessee, and/or operator of the public accommodation known as Dipea Wings.

III. ALLEGATIONS

A. Regarding the Plaintiffs' Medical Conditions

16. Dalia suffers from the following condition: quadriplegia due to a spinal cord injury at the C5, C6, and C7 levels.
17. As a result of this condition, Dalia has substantial mobility limitations compared to the average person in the general population. For example, Dalia is unable to walk and has no sensation from the chest down, requiring assistance with most daily activities. She has limited movement in her left arm and very little strength and movement in her right arm. She cannot bend, twist, or lift objects, and simple tasks such as sitting without proper support or transferring from one place to another require additional help. Due to the severity of her condition, she also faces difficulties navigating through narrow spaces, such as doorways or

crowded areas, as her motorized wheelchair (Permobil M300), although highly functional, requires more room to maneuver. Therefore, she must use a motorized wheelchair equipped with various functions, including tilt capabilities and directional signals, to move around.

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

18. The areas within the Municipality of Dorado and the establishments in controversy, where Mrs. Vázquez has been unable to access due to barriers, are the following:

18.1. The location in controversy is a place of public accommodation, known as Mahi Mahi Shopping Village located at 425 State Highway # 693, Dorado, PR 00646-0000, with coordinates 18.463922885752147, -66.2733502814739.

18.1.1. The sidewalks in question are located around of Mahi Mahi Shopping Village located at 425 State Highway #693, Dorado, PR 00646-0000, with coordinates 18.464011748110675, -66.27285447906844.

18.1.2. The sidewalk ramps in question are located around of Mahi Mahi Shopping Village located at 425 State Highway #693, Dorado, PR 00646-0000, at the following coordinates 18.464011748110675, -66.27285447906844.

18.1.3. The location in controversy is a place of public accommodation, known as Al Pan Pan located at Street. 693, Mahi Mahi Shopping Village Local A-1, Industrial Park, Dorado, PR 00646-0000, with coordinates 18.463729627838983, -66.27250436424694.

18.1.4. The location in controversy is a place of public accommodation, known as Go Fresh located at Mahi Mahi Shopping Village, Dorado Neighborhood, Industrial Park, Dorado, PR 00646-0000 with coordinates 18.463565606102502, -66.27304344616392.

18.1.5. The location in controversy is a place of public accommodation, known as La Hacienda Meat Center located at Mahi Mahi Shopping Center, Hwy. 693 KM

7.5, Dorado, PR 00646 - 0000, with coordinates 18.463760151839633, -66.27323983121629.

18.2. The location in controversy is a place of public accommodation, known as Plaza Dorada Shopping Center located at Highway 693, corner of José Efrón Avenue, Dorado, PR 00646-0000, with coordinates 18.464960392294337, -66.28245451171713.

18.2.1. The sidewalks in question are located along the entrance to Plaza Dorada Shopping Center, located at Highway 693, corner of José Efrón Avenue, Dorado, PR 00646-0000, with coordinates 18.464960392294337, -66.28245451171713.

18.2.2. The location in controversy is a place of public accommodation, known as Applebee's Grill + Bar, located at Plaza Dorada Shopping Center Road 693, Dorado, PR 00646-0000, with coordinates 18.46536310771627, -66.28226840144788.

18.2.3. The location in controversy is a place of public accommodation, known as Metropol Dorado located at Highway 693 Km 8.15 Plaza Dorada Shopping Center, Dorado, PR 00646-0000, with coordinates 18.46383995518637, -66.28238367907963.

18.2.4. The location in controversy is a place of public accommodation, known as Popeyes - Dorado located at Highway 693 Plaza Dorada Shopping Center, Dorado, PR 00646-0000, with coordinates 18.4649286734534, -66.28205492697619.

18.3. The location in controversy is a place of public accommodation, known as Doramar Plaza located at Exit #24 of Expressway 22, Hwy. #693, Dorado, PR 00646-0000 with coordinates 18.422085964018134, -66.26749431337393.

- 18.3.1. The sidewalk in question is located in around of Doramar Plaza located at Exit #24 of Expressway 22, Hwy. #693, Dorado, PR 00646-0000 with coordinates 18.422283163126153, - 66.26711879626183.
- 18.3.2. The location in controversy is a place of public accommodation, known as El Meson Sandwiches Dorado located at Doramar Plaza Shopping Center, Street 693 Km 1.5 Lote A-3, Maguayo Nbhd., Dorado, PR 00646-0000 with coordinates 18.422047704314714, -66.26612114788016.
- 18.3.3. The location in controversy is a place of public accommodation, known as Sizzler Rest Dorado located at Doramar Plaza, Lot B-5, Maguayo Nbhd., PR-693 Highway, Int. 659, Dorado, PR, 00646-0000, with coordinates 18.422761133463503, -66.26652474044184.
- 18.3.4. The location in controversy is a place of public accommodation, known as Taco Maker located at Doramar Plaza Shopping Center, Unit B2-10, Maguayo Nbhd., Dorado, PR, 00646-0000, with coordinates 18.422954214460617, -66.2673430623392.
- 18.4. The location in controversy is a place of public accommodation, known as Dorado del Mar Shopping Center, located at PR-693 Highway, Dorado, PR, 00646, with coordinates 18.463210695071773, -66.27130612477201.
 - 18.4.1. The sidewalks in question are located along of the entrance to Dorado del Mar Shopping Center, located at PR-693 Highway, Dorado, PR, 00646, at the following coordinates: 18.46348746363492, -66.27200468761252.
 - 18.4.2. The location in controversy is a place of public accommodation, known as Firehouse Subs located at Hwy. #693, Dorado Del Mar Shopping Center, Dorado, PR 00646-0000, with coordinates 18.462743355898706, -66.27106736733494.

- 18.4.3. The location in controversy is a place of public accommodation, known as Sabor Frappe located at Dorado del Mar Shopping Center, Local #5, Dorado, PR, 00646-0000, with coordinates 18.464063915628646, -66.27180143216066.
- 18.4.4. The location in controversy is a place of public accommodation, known as The Yellow Door Coffee & Ice Cream Shop located at Dorado del Mar Shopping Center, Unit 34A, Dorado, PR, 00646 - 0000 with coordinates 18.463410920991674, -66.27089359118715.
- 18.5. The location in controversy is a place of public accommodation, known as Café Cuatro Sombras, located at Highway 693 Km 8.5, Higuillar Nbhd, Dorado, PR 00646-0000, with coordinates 18.466133320648673, -66.28173108803783.
- 18.5.1. The sidewalks in question are located in front of Café Cuatro Sombras, located at Street 693 Km 8.5 Higuillar Nbhd, Dorado, PR 00646-0000, with coordinates 18.466133320648673, -66.28173108803783.
- 18.6. The location in controversy is a place of public accommodation, known as Embassy Suites Hotel Dorado Del Mar Beach Resort located at 201 Boulevard Street, Dorado, PR 00646-2344, with coordinates 18.47741150316954, -66.2731723888763.
- 18.6.1. The sidewalk in question is located in front of Embassy Suites Hotel Dorado Del Mar Beach Resort located at 201 Boulevard Street, Dorado, PR 00646-2344, with coordinates 18.476904291285905, -66.2733185708049.
- 18.6.2. The location in controversy is a place of public accommodation, known as New York Grill And Steakhouse located at 200 Boulevard Street, Dorado, PR 00646-2344, with coordinates 18.47673271844536, -66.27263343362668.

18.7. The location in controversy is a place of public accommodation, known as Kikita Beach House located at 118 13th Street, Dorado, PR 00646-2447, with coordinates 18.476931569180106, -66.25935870676985.

18.7.1. The sidewalk in question is located in front of Kikita Beach House located at 118 13th Street, Dorado, PR 00646-2447, with coordinates 18.476931569180106, -66.25935870676985.

18.8. The location in controversy is a place of public accommodation, known as La Pachanga located at Méndez Vigo Highway KM 5.4, El Ramal, Pueblo Neighborhood, Dorado, PR 00946-0000, with coordinates 18.45659951280812, -66.25571971538228.

18.8.1. The sidewalk in question is located in front of La Pachanga located at Méndez Vigo Highway KM 5.4, El Ramal, Pueblo Neighborhood, Dorado, PR 00946-0000, with coordinates 18.45659951280812, -66.25571971538228.

18.9. The location in controversy is a place of public accommodation, known as La Terraza located at Highway 693, Marginal C-1 Street, Costa De Oro, Dorado, PR 00646-2021, with coordinates 18.466620823829988, -66.278696740157.

18.9.1. The sidewalk in question is located in front of La Terraza located at Highway 693, Marginal C-1 Street, Costa De Oro, Dorado, PR 00646-2021, with coordinates 18.466620823829988, -66.278696740157.

18.10. The location in controversy is a place of public accommodation, known as Lula' S Burger located at Hwy 693, Km 8 Hm 5, Higuillar, Dorado, PR 00646-6706, with coordinates 18.466026742509353, -66.28131382468887.

18.10.1. The sidewalk in question is located in front of Lula's Burger Corporation located at Hwy 693, Km 8 Hm 5, Higuillar, Dorado, PR 00646-6706, with coordinates 18.466026742509353, -66.28131382468887

- 18.11. The location in controversy is a place of public accommodation, known as Melolaika Burguer located at Hwy #2, Km 25, Espinosa, Dorado, PR 00646-9840, with coordinates 18.40663827256182, -66.27703711783654.
- 18.12. The location in controversy is a place of public accommodation, known as Pirilo Pizza Rústica – Dorado located at Hwy 693 Km 8.5, Dorado, PR 00646-6706, with coordinates 18.46614789336877, -66.28172896088809.
- 18.12.1. The sidewalk in question is located in front of Pirilo Pizza Rústica – Dorado located at Hwy 693 Km 8.5, Dorado, PR 00646-6706, with coordinates 18.46614789336877, -66.28172896088809.
- 18.13. The location in controversy is a place of public accommodation, known as Punto Plena Bakery located at 279 Street Mendez Vigo, Dorado, PR 00646-4951, with coordinates 18.459230188575628, -66.26244819310499.
- 18.13.1. The sidewalk in question is located in front of n as Punto Plena Bakery located at 279 Street Mendez Vigo, Dorado, PR 00646-4951, with coordinates 18.459230188575628, -66.26244819310499.
- 18.14. The location in controversy is a place of public accommodation, known as Katrina located at Costa De Oro Block G 146 Street A, Dorado, PR 00646-2008, with coordinates 18.474328593250682, -66.27992585018596.
- 18.14.1. The sidewalk in question is located in front of Katrina located at Costa De Oro Block G 146 Street A, Dorado, PR 00646-2008, with coordinates 18.474328593250682, -66.27992585018596.
- 18.15. The location in controversy is a place of public accommodation, known as Tres Palos Bar and Grill located at Saldinera G133 Street C, Dorado, PR 00646-2016, with coordinates 18.470629441443233, -66.27940288072631.

- 18.15.1. The sidewalk in question is located in front of Tres Palos Bar and Grill located at Saldinera G133 Street C, Dorado, PR 00646-2016, with coordinates 18.470629441443233, -66.27940288072631.
- 18.16. The location in controversy is a place of public accommodation, known as Rombo Asador Playero located at 112A Parc Mameyal, 15th Street, Dorado, PR 00646-0000 with coordinates 18.47587612471353, -66.26240347624201.
- 18.16.1. The sidewalks in question are located in front of Rombo Asador Playero located at 112A Parc Mameyal, 15th Street, Dorado, PR 00646-0000, at the following coordinates: 18.475842238343102, -66.26245345901326 and 18.475824, -66.262362.
- 18.17. The location in controversy is a place of public accommodation, known as The Beer Shop located at 343 Mendez Vigo Street, Dorado, PR, 00646-0000, with coordinates 18.46037999384429, -66.26568683850401.
- 18.17.1. The sidewalk in question is located in front of The Beer Shop located at 343 Mendez Vigo Street, Dorado, PR, 00646-0000, at the following coordinates: 18.460518046638988, -66.26556316797235
- 18.17.2. The sidewalk ramp in question is located at the following coordinates: 18.459230466317372, -66.26178389194918.
- 18.18. The location in controversy is a place of public accommodation, known as The Pizza Boy located at 287 Mendez Vigo Street, Dorado, PR, 00646-0000, with coordinates 18.459478223188306, -66.26286175826097.
- 18.18.1. The sidewalks in question are located in front of and adjacent to The Pizza Boy located at 287 Mendez Vigo Street, Dorado, PR, 00646-0000, at the following coordinates: 18.45954066500332, -66.26284566008555 and 18.45948087623273, -66.26291539751887.

18.19. The location in controversy is a place of public accommodation, known as Villa Dorada D'Alberto, located at Street E #99, Dorado, PR 00646-0000, with coordinates 18.47412914453545, -66.28042510275267.

18.19.1. The sidewalk in question is located in front of Villa Dorada D'Alberto, located at Street E #99, Dorado, PR 00646-0000, with coordinates 18.47412914453545, -66.28042510275267.

18.20. The location in controversy is a place of public accommodation, known as Villa Dorada Sport Bar And Grill located at Urb Sardinera Beach E97 Street F, Dorado, PR 00646-0000, with coordinates 18.473594983598513, -66.28107265105835.

18.20.1. The sidewalk in question is located in front of Villa Dorada Sport Bar And Grill located at Urb Sardinera Beach E97 Street F, Dorado, PR 00646-0000, with coordinates 18.473594983598513, -66.28107265105835.

18.21. The location in controversy is a place of public accommodation, known as Don Tako Cantina Mexicana located at 99 Street B, Dorado, PR 00646-0000, with coordinates 18.473378372809094, -66.28018895152259.

18.21.1. The sidewalk in question is located in front of Don Tako Cantina Mexicana located at 99 Street B, Dorado, PR 00646-0000, with coordinates 18.473378372809094, -66.28018895152259.

18.22. The location in controversy is a place of public accommodation, known as Green Bites located at #282 Méndez Vigo Rd, Dorado, PR 00646-0000, with coordinates 18.458546771785723, -66.25976072202899.

18.22.1. The sidewalk in question is located in front of Green Bites located at #282 Méndez Vigo Rd, Dorado, PR 00646-0000, with coordinates 18.458546771785723, -66.25976072202899.

18.23. The location in controversy is a place of public accommodation, known as Blooming Cup located at 311 Méndez Vigo Rd, Dorado, PR 00646-0000, with coordinates 18.459796388787026, -66.26391630768869.

18.23.1. The sidewalk in question is located in front of Blooming Cup located at 311 Méndez Vigo Rd, Dorado, PR 00646-0000, with coordinates 18.459796388787026, -66.26391630768869.

18.24. The location in controversy is a place of public accommodation, known as Dipea Wings located at 403 Street Mendez Vigo, Dorado, PR 00646-4824, with coordinates 18.46149953134345, -66.26980614523089.

18.24.1. The sidewalk in question is located in front of Dipea Wings located at 403 Street Mendez Vigo, Dorado, PR 00646-4824, with coordinates 18.46149953134345, -66.26980614523089.

C. Discrimination in Municipality of Dorado and other businesses against Mrs. Dalia Vázquez Aguiñaga due to her disability

19. Dalia Vázquez, a resident of Dorado, finds great joy in visiting different places, especially restaurants, recreational spaces, and various businesses within the municipality. One of her greatest pleasures is exploring new establishments, trying different foods, and enjoying the vibrant atmosphere of Dorado. These outings are not just a pastime for Mrs. Vázquez; they serve as a way for her to momentarily disconnect from the health challenges she faces daily. However, due to the architectural barriers present in many of these places, including shopping centers and restaurants, Mrs. Vázquez is often discouraged from visiting. These barriers, which hinder her ability to move freely in her motorized wheelchair, prevent her from fully enjoying these experiences.

20. Suffering from quadriplegia due to a spinal cord injury at the C5, C6, and C7 levels, Dalia Vázquez experiences constant physical limitations and pain. However, when she is able to

visit a new shopping center or enjoy a meal at a restaurant with a pleasant atmosphere, she finds a sense of normalcy, enjoyment, and relief from her struggles. Being able to spend her time engaging in these activities allows her to focus on the things she loves, rather than the limitations imposed by her condition. Unfortunately, architectural barriers in many public places hinder her ability to enjoy these outings, but she remains hopeful that improvements in accessibility will allow her to experience these moments of joy more freely.

21. Unfortunately, this enjoyment is often overshadowed by the numerous architectural barriers she encounters within the Municipality of Dorado. Instead of experiencing a smooth and enjoyable visit, her outings are frequently disrupted by accessibility challenges that make it difficult, exhausting, or even impossible for her to navigate public spaces safely. These barriers, such as narrow sidewalks, uneven surfaces, and inadequate ramps, hinder her ability to fully enjoy the places she loves to visit, leaving her feeling frustrated and discouraged.
22. One of the most frustrating and discouraging barriers she faces is the poor condition and inaccessibility of public sidewalks. Many sidewalks in Dorado are cracked, uneven, and obstructed, making it dangerous and physically straining for her to navigate with her motorized wheelchair. Even worse, many businesses and establishments improperly use the sidewalks for parking spaces or place objects that block access, forcing Mrs. Vázquez to take alternative and unsafe routes or, in some cases, abandon her visits altogether. These obstacles significantly hinder her ability to enjoy the community spaces and fully participate in the activities she loves.
23. Despite her desire to continue enjoying her favorite pastime, the Municipality of Dorado has failed to take meaningful action to ensure that public spaces are accessible to individuals with mobility impairments. This lack of accessibility directly impacts her independence and quality of life, as the constant struggle to navigate these spaces turns what should be a moment of relaxation into a frustrating and exhausting ordeal. The failure to address these barriers

prevents Mrs. Vázquez from fully participating in her community and enjoying the outings that bring her joy.

24. Additionally, even when she manages to overcome the barriers on the sidewalks and reach businesses or restaurants, Mrs. Vázquez continues to encounter obstacles inside these establishments. Some of the most common barriers include high service counters without accessible sections, narrow aisles that make it difficult for her to move safely, and restrooms that lack proper accommodations such as grab bars and sufficient maneuvering space. These conditions completely prevent her from fully enjoying her visit, leaving her feeling excluded and discouraged from returning. The lack of attention to accessibility in these spaces further diminishes her ability to engage with the community and enjoy her outings.
25. Mrs. Vázquez feels discouraged from visiting several places located in Dorado because she knows she cannot enjoy them due to the architectural barriers present at those locations:

Responsibility of the Commonwealth of Puerto Rico; Municipality of Dorado; Interservice Group, Inc. - Mahi Mahi Shopping Village; Innova Up Group LLC - Al Pan Pan; Always Fresh LLC - Go Fresh; Apolinar LLC - La Hacienda Meat Center

26. Mrs. Dalia Vázquez wants to visit Mahi Mahi Shopping Village because it offers a wide variety of stores, a pharmacy, restaurants, and shops that sell paintings, as well as a supermarket and a bank, all with excellent service. Among its attractions are establishments like Al Pan Pan and Go Fresh, which catch her attention for their gastronomic offerings. However, since December 2024, she has been aware that this place has architectural barriers that prevent her from accessing it freely. Due to her quadriplegia and reliance on a wheelchair, these difficulties have discouraged her from visiting the shopping center. In January and February 2025, she has wanted to go because she enjoys shopping for fresh produce, trying new restaurants, and spending time in a pleasant environment, but the architectural barriers have dissuaded her from doing so. Over the next three months, she wants to visit Mahi Mahi Shopping Village to explore its variety of stores, enjoy meals at restaurants, and take

advantage of seasonal discounts. However, the existing architectural barriers prevent her from accessing the place, which discourages her from going. The barriers she is aware of are the following:

26.1. Sidewalk Barriers Around Mahi Mahi Shopping Village: The sidewalks located around of Mahi Mahi Shopping Village located at 425 State Highway #693, Dorado, PR 00646-0000, with coordinates 18.46306203152681, - 66.27180079565228 present multiple barriers that hinder the mobility of Mrs. Dalia Vázquez, who uses a motorized wheelchair. These barriers include insufficient width, which limits her ability to maneuver; deteriorated pavement with cracks, holes, and uneven surfaces that cause sudden jolts and require extra effort; and poorly maintained ramps with uneven surfaces and worn-out edges, making level transitions difficult.

26.1.1. Mrs. Dalia Vázquez is aware of the narrow sidewalks. Due to the width of her Permobil M300 motorized wheelchair, maneuvering through these tight spaces is extremely difficult. The limited space forces her to make constant adjustments to avoid obstacles, making navigation stressful and time-consuming. Additionally, the risk of getting stuck or being unable to turn properly adds to her frustration. Because of this, she feels discouraged from visiting Mahi Mahi Shopping Village.

26.1.2. Mrs. Dalia Vázquez is aware that the sidewalks are in poor condition because they have cracks, holes, and uneven pavement create serious obstacles when moving in her motorized wheelchair, as these irregularities cause sudden jolts and unexpected stops that make her journey uncomfortable and exhausting. Given her limited arm strength, adjusting to these abrupt movements requires additional effort, making navigation frustrating. As a result, she feels unmotivated to visit the shopping center.

- 26.1.3. Mrs. Dalia recognizes the poor condition of the ramps located around Mahi Mahi Shopping Village. The uneven surfaces, cracks, and worn-out edges make it challenging for her to smoothly transition from one level to another using her motorized wheelchair. The instability of these ramps forces her to slow down significantly, requiring extra effort and caution to avoid sudden jolts that could cause discomfort due to her limited upper-body strength. This difficulty makes her hesitant to visit the shopping plaza.
- 26.1.4. As a result, the Commonwealth of Puerto Rico is responsible for ensuring that public sidewalks and ramps along State Highway #693 are properly designed, maintained, and accessible. However, its inaction has led to significant barriers for Mrs. Dalia Vázquez. The sidewalks lack adequate width, remain in poor condition with uneven and hazardous surfaces, and the ramps have deteriorated due to neglect. These failures have created physical obstacles that obstruct her mobility, preventing her from navigating the area safely and independently. By failing to meet accessibility standards, the Commonwealth has directly contributed to her exclusion, reinforcing the barriers that limit her access to public spaces.
- 26.1.5. Additionally, the Municipality of Dorado, which is responsible for the sidewalks around Mahi Mahi Shopping Village, including streets like Calle Comercio, should eliminate the barriers by widening the sidewalks to provide sufficient space for Mrs. Dalia Vázquez to navigate comfortably in her motorized wheelchair. The municipality should also repair and resurface damaged sidewalks, eliminating cracks, holes, and uneven surfaces that make movement difficult. Deteriorated ramps must be replaced or properly maintained to ensure a smooth transition between levels, with stable,

slip-resistant surfaces that allow Mrs. Vázquez to move safely. These improvements must be implemented immediately to remove the physical obstacles that currently hinder her mobility in Mahi Mahi Shopping Village.

- 26.2. **Parking Area of Mahi Mahi Shopping Village with Damaged Pavement:** Mrs. Dalia Vázquez is aware of the poor condition of the parking area pavement of Mahi Mahi Shopping Village. The uneven and cracked surface makes it extremely difficult for her to maneuver her Permobil M300 wheelchair safely. The instability of the ground causes discomfort and requires extra effort to navigate, increasing the risk of her wheelchair getting stuck or tilting. Given her limited upper body strength, she struggles to adjust or recover from sudden jolts caused by the rough terrain. This situation makes her feel discouraged from visiting Mahi Mahi Shopping Village.
- 26.3. **Deteriorated Ramps at Mahi Mahi Shopping Village:** Mrs. Dalia Vázquez recognizes the issues caused by the deteriorated ramps at Mahi Mahi Shopping Village. The worn-out and uneven surfaces, along with possible structural weaknesses, make it hard for her to ascend or descend safely in her motorized wheelchair. Due to her quadriplegia, she cannot use her arms effectively to stabilize herself if the wheelchair tilts or jerks unexpectedly. The condition of these ramps creates an unsafe and stressful experience, leaving her feeling disheartened about visiting Mahi Mahi Shopping Village.
- 26.4. **Poor Condition of Access Routes to Stores at Mahi Mahi Shopping Village:** Mrs. Dalia Vázquez has noticed that the pathways leading to the stores are in poor condition. The rough, uneven surfaces make it difficult for her wheelchair to move smoothly, often requiring additional effort and time to navigate. Her limited mobility prevents her from adjusting quickly to unexpected obstacles, making each movement

on these pathways exhausting and uncomfortable. The struggle to access the stores leaves her feeling unmotivated to visit Mahi Mahi Shopping Village.

26.5. The barriers on Mahi Mahi Shopping Village could be eliminated by repaving the parking area to create a smooth and stable surface, ensuring that Mrs. Dalia Vázquez can maneuver her wheelchair safely without the risk of getting stuck or experiencing discomfort. The deteriorated ramps should be repaired or replaced with structurally sound, slip-resistant materials, allowing her to ascend and descend without instability. Additionally, the access routes to the stores must be resurfaced to remove cracks, uneven sections, and other obstructions that make navigation difficult. These improvements should be implemented promptly to provide a safe and accessible environment for Mrs. Dalia Vázquez at Mahi Mahi Shopping Village.

27. Mrs. Dalia is interested in visiting several businesses within Mahi Mahi Shopping Village, including Al Pan Pan, Go Fresh and La Hacienda Meat Center. However, she faces difficulties due to architectural barriers in these establishments, which limit her mobility and access to their facilities. These barriers affect her experience and restrict her right to fully enjoy the services they offer. Since these businesses are located within the shopping center, it is also the responsibility of Interservice Group, Inc. to ensure accessibility to them.

27.1. Responsibility of Interservice Group, Inc. and Innova Up Group LLC - Al Pan Pan: Mrs. Dalia Vázquez has heard wonderful things about Al Pan Pan, a restaurant known not only for the quality of its dishes but also for the friendliness of its staff, making it an excellent place to enjoy breakfast in a warm and welcoming atmosphere. She is particularly attracted to the famous pancakes and omelettes, whose unique textures and flavors make her eager to experience them. Mrs. Vázquez intends to visit Al Pan Pan in the next two months, with the desire to celebrate one of her special dates, enjoying a delicious breakfast under the summer sun. However, she feels discouraged

from doing so due to the architectural barriers, of which she is aware, present at the establishment. These barriers, by hindering her access and mobility, represent a real obstacle for her, depriving her of the ability to enjoy the restaurant fully and equitably. Despite her desire to return, these barriers remain an impediment for Mrs. Vázquez to fully enjoy the experience she longs for. The identified barriers are as follows:

- 27.1.1. Inadequate Access Ramp: The access ramp at the establishment presents several issues that severely hinder Mrs. Dalia Vázquez's ability to access the premises. First, the ramp is sloped unevenly, making it difficult for Mrs. Vázquez to safely ascend with her motorized wheelchair. Additionally, the ramp has cracks and holes in its surface, which, when water accumulates during rainfall, create a hazardous trap that increases the risk of falls or damage to the wheelchair. Visible wear at the beginning of the ramp also indicates significant deterioration due to use, making it even harder to navigate. Due to her quadriplegia, Mrs. Vázquez relies on a safe and accessible ramp to independently access the establishment. The lack of maintenance and the poor condition of the ramp discourage her from returning, as she cannot trust that the access will be safe. These barriers exclude her from enjoying the venue on equal terms, limiting her autonomy and dissuading her from visiting the establishment.
- 27.1.2. Inaccessible Tables: The tables in the establishment feature a structure that makes it difficult for Mrs. Dalia Vázquez to access them. The tables, dark in color, have square metal bases positioned just beneath the table surface, which prevents Mrs. Vázquez from comfortably approaching them with her motorized wheelchair, which requires clear and adequate space to maneuver. The metal bases block the front access, forcing Mrs. Vázquez to make

complicated maneuvers to approach and sit, resulting in unnecessary and painful effort for her. Additionally, the height of the tables, combined with the lack of adequate space underneath, makes it very difficult for Mrs. Vázquez to sit comfortably and safely from her wheelchair. Due to her quadriplegia, she is unable to adjust her position without external assistance, which increases her dependence on others to access the table and enjoy her meal. This lack of accessibility not only affects her comfort but also her autonomy and dignity. Despite Mrs. Vázquez appreciating the restaurant's food offering and intending to return, especially to enjoy its famous breakfast in a pleasant atmosphere, the current barriers completely discourage her from doing so. The structure of the tables and the lack of accessible adaptation make her feel she cannot enjoy the experience like any other person. Every time she considers returning, she faces the same difficulty, which reinforces her discouragement and prevents her from enjoying the restaurant fully and independently. Therefore, she feels disheartened and excluded, making her reconsider her intention to return to Al Pan Pan, even despite her desire to do so.

- 27.1.3. Excessively High Counters: In the establishment, the service counters are excessively high, with a dark metal structure and a glass surface that reflects light, making the bar not only visually imposing but also increasing the difficulty for Mrs. Dalia Vázquez to interact with the restaurant staff. The height of these counters exceeds that which is accessible for people using motorized wheelchairs, such as Mrs. Vázquez, who requires a counter structure that allows her to easily access the service. Since Mrs. Vázquez suffers from quadriplegia, she is unable to reach or comfortably communicate with the staff without assistance from someone else. This not only represents a physical

obstacle but also prevents her from being served independently, affecting her autonomy and dignity. Although Mrs. Vázquez desires to return to enjoy the establishment's food offerings, the barrier of high counters prevents her from doing so. She feels discouraged by the constant need to rely on others for simple tasks, like placing an order or receiving assistance, which causes her to reconsider her intention to return. Despite her appreciation for the atmosphere and dishes at the restaurant, the persistence of this issue discourages her from returning, depriving her of an experience she would otherwise enjoy fully.

27.1.4. Unreachable Payment Stations: In the establishment, the payment stations, although visually appealing with a design of bright-colored tiles, are positioned at an excessively high level, making it impossible for Mrs. Dalia Vázquez to complete transactions independently. The height of these stations, combined with the lack of sufficient space underneath, prevents Mrs. Vázquez from approaching them properly with her motorized wheelchair. Due to her quadriplegia, she is unable to reach the payment area or interact with the payment system without assistance from someone else. This barrier, in addition to limiting her ability to make purchases independently, also affects her dignity, as she must rely on others to complete simple daily tasks. Despite her desire to enjoy the establishment, Mrs. Vázquez feels discouraged by the persistence of these barriers, preventing her from fully participating in the experience. The lack of accessibility at the payment stations discourages her from returning, as it makes her feel excluded and dependent, limiting her freedom and ability to enjoy her visit to the restaurant.

27.1.5. Inaccessible High Bar: In the establishment, the bar area is designed at a height that completely prevents Mrs. Dalia Vázquez from using it. The structure of

the bar, white in color with a smooth surface, is so high that it does not allow Mrs. Vázquez to access the space without depending on the assistance of others. Due to her quadriplegia, she cannot interact with the bar area unless there is an adapted section that would allow her to use it comfortably and independently. This barrier not only limits Mrs. Vázquez's ability to enjoy the atmosphere of the establishment but also reinforces structural discrimination by excluding her from an experience that should be available to all customers equally. Despite her interest in enjoying the restaurant and its atmosphere, Mrs. Vázquez feels discouraged by the lack of access to the bar, which dissuades her from returning. The accessibility barriers make her feel that she cannot enjoy the space on equal terms, limiting her autonomy and preventing her from having a full experience.

- 27.1.6. To ensure that Al Pan Pan complies with ADA regulations and provides an inclusive experience for Mrs. Dalia Vázquez, the following modifications are necessary: The access ramp must be repaired to ensure an appropriate slope of no more than 1:12, a level surface. The tables should be replaced or modified to include the proper height and depth, allowing Mrs. Vázquez to approach comfortably and enjoy her meal without obstacles. Additionally, the service counters and payment stations must be lowered to a maximum height of 36 inches and include adequate space underneath to allow Mrs. Vázquez to make transactions independently, without relying on external assistance. Finally, the bar area must be modified to include an accessible section no higher than 34 inches, allowing Mrs. Vázquez to enjoy the atmosphere of the place equitably. These improvements will enable Mrs. Vázquez to enjoy the restaurant with

autonomy and dignity, eliminating the barriers that currently discourage her from visiting.

27.2. Responsibility of Interservice Group, Inc. and Always Fresh LLC - Go Fresh: Mrs. Vázquez wants to visit Go Fresh inside Mahi Mahi Shopping Village because she is drawn to its wide variety of healthy options, fast service, and pleasant atmosphere. She has heard that the food is delicious, featuring dishes like malanga soup and tasty salads. She is excited about the diverse menu, which includes bowls, burritos, and salads, and she specifically wants to try the Ground Turkey Bowl and the Spicy Crab Bowl. Additionally, she appreciates that the sobeto used in the establishment is plant-based and biodegradable. However, since December 2024, she has known that this place has architectural barriers that prevent her from accessing it freely. Due to her quadriplegia and reliance on a wheelchair, these difficulties have discouraged her from visiting. In January and February 2025, she has wanted to visit Go Fresh because she enjoys discovering new restaurants that offer fresh and healthy meals. She is particularly interested in its menu, which includes a variety of nutritious options. But the architectural barriers have dissuaded her from doing so. Over the next three months, she wants to visit Go Fresh because she wants to eat fresh and healthy meals in a pleasant environment. She has the particular intention of trying the Ground Turkey Bowl, a dish that has caught her attention due to its fresh ingredients and balanced flavors. However, the existing barriers continue to discourage her from visiting Go Fresh. The barriers she is aware of are the following:

27.2.1. Uneven Access Route from the Parking Lot: Mrs. Dalia Vázquez is aware of the poor condition of the access route from the parking lot. The uneven surface creates significant challenges for her as she navigates in her motorized wheelchair, requiring extra effort and causing discomfort due to unexpected

jolts. Her limited upper body strength makes it difficult for her to compensate for sudden movements, making the route both exhausting and frustrating. This situation discourages her from visiting Go Fresh.

27.2.2. Heavy Glass Entrance Door with White Frame: Mrs. Dalia Vázquez is aware about the weight of the glass entrance door with a white frame. Due to her quadriplegia, she lacks the arm strength needed to push and pull a heavy door, making it extremely difficult for her to enter independently. The effort required to manage the door makes her feel unwelcome and frustrated, discouraging her from visiting the establishment.

27.2.3. Excessively High Brown Counter: Mrs. Dalia Vázquez has noticed that the brown counter is too high for her to reach comfortably. Since she cannot stand and extend her arms with strength, interacting with the counter becomes impossible. Simple tasks, such as placing an order or receiving items, require external assistance, making her feel limited and dependent. This difficulty leaves her feeling discouraged from visiting the restaurant.

27.2.4. Shallow Brown Counter: Mrs. Dalia Vázquez experiences challenges with the brown counter's lack of depth. The limited space prevents her from positioning her wheelchair close enough to use the counter effectively. Since she cannot lean forward and stretch her arms significantly, reaching for items and interacting with staff is complicated. The discomfort and inconvenience make her feel unmotivated to visit Go Fresh.

27.2.5. Table Layout Hindering Circulation: Mrs. Dalia Vázquez finds that the table arrangement inside the restaurant makes it difficult for her to move around. The narrow spaces and tight layout force her to make complex maneuvers in her wheelchair, increasing the risk of getting stuck or having to ask others to

move tables and chairs. Navigating through the space is tiring and inconvenient, making her feel dissuaded from dining at Go Fresh.

- 27.2.6. The barriers on Go Fresh could be eliminated by resurfacing the access route from the parking lot to create a smooth and even pathway, allowing Mrs. Dalia Vázquez to navigate comfortably in her wheelchair. The heavy glass entrance door with a white frame must be replaced with an automatic door or equipped with an easier-to-use mechanism to ensure she can enter without struggle. The brown counter should be lowered to a reachable height and extended in depth so she can position her wheelchair properly and interact with the staff without difficulty. Additionally, the table layout should be adjusted to provide wider spaces between tables, allowing her to move freely without obstacles. These modifications should be implemented to ensure Mrs. Dalia Vázquez can access and enjoy Go Fresh without unnecessary challenges.
- 27.3. Responsibility of Interservice Group, Inc. and Apolinar LLC -La Hacienda Meat Center: Mrs. Dalia Vázquez wants to visit La Hacienda Meat Center because it is a modern butcher shop that offers a wide variety of meats with excellent presentation. She knows that the place not only provides high-quality cuts but also prepared products that are hard to find elsewhere, such as its delicious soups and cheese flan. Additionally, she is interested in trying the daily lunches, which are known for their great taste. However, since December 2024, she has known that this place has architectural barriers that prevent her from accessing it freely. Due to her quadriplegia and reliance on a wheelchair, these difficulties have discouraged her from visiting. In January and February 2025, she has wanted to visit because she enjoys purchasing high-quality meats and trying unique food products. She is particularly interested in exploring the variety of prepared meals and experiencing the customer service that

many people praise. However, the architectural barriers that she knows the place has and that hinder access have ultimately dissuaded her from going.

27.4. Over the next three months, she wants to visit La Hacienda Meat Center because she is eager to try the daily lunches and buy some of the specialty meat cuts that are not commonly found elsewhere. She also wants to buy some ready-to-eat meals. However, the existing architectural barriers make it difficult for her to move around comfortably in the establishment, which discourages her from going. The barriers she is aware of are the following:

27.4.1. Deteriorated Pavement on the Access Route: Mrs. Dalia Vázquez is aware that the pavement on the access route from the parking lot to La Hacienda Meat Center is in poor condition. The uneven and damaged surface makes it difficult for her to navigate in her motorized wheelchair, causing discomfort and requiring extra effort to maintain stability. The rough terrain limits her ability to move independently, creating an unnecessary obstacle from the moment she arrives. Due to this, she feels discouraged from visiting the establishment.

27.4.2. Heavy Glass Entrance Door with White Frame: Mrs. Dalia knows that the main entrance door at La Hacienda Meat Center is made of glass with a white frame and is excessively heavy. Because of her limited arm strength, she is unable to push and hold the door open while maneuvering her wheelchair, making entry into the establishment a struggle. The weight of the door forces her to rely on external assistance, reducing her independence. This difficulty in accessing the store makes her feel dissuaded from visiting the location.

27.4.3. Display Cases Too High: Mrs. Vázquez is aware that the display cases at La Hacienda Meat Center are positioned at a height that makes it difficult for her to see and reach the products. Since she remains seated in her wheelchair, her

line of sight is significantly lower than that of a standing person, preventing her from comfortably viewing the items inside the cases. This limitation makes shopping an inconvenient and frustrating experience, discouraging her from visiting the establishment.

27.4.4. Narrow Aisles: Mrs. Dalia Vázquez has noted that the aisles inside La Hacienda Meat Center are too narrow for her to navigate comfortably in her motorized wheelchair. The limited space forces her to make tight maneuvers, which are difficult given her mobility restrictions. The lack of adequate clearance makes it challenging to move freely without hitting shelves and struggling to turn. Because of this, she feels dissuaded from shopping at the establishment.

27.4.5. Shelves Too High: Mrs. Dalia Vázquez is aware that the shelves at La Hacienda Meat Center are too high for her to reach from her wheelchair. Since she has very limited strength and movement in her arms, she is unable to grab items placed on the upper levels without assistance. This lack of accessibility forces her to rely on others, taking away her ability to shop independently. The difficulty in reaching products makes her feel discouraged from visiting the store.

27.4.6. Freezers Positioned Too High: Mrs. Vázquez knows that the freezers inside La Hacienda Meat Center are placed at an inaccessible height for her. Sitting in her wheelchair, she is unable to see and reach frozen items stored on the upper shelves. Her limited arm mobility makes it impossible to extend her reach, preventing her from selecting the products she needs. This barrier creates a frustrating shopping experience, making her feel dissuaded from visiting the establishment.

- 27.4.7. Heavy Freezer Doors: Mrs. Vázquez is aware that the freezer doors at La Hacienda Meat Center are too heavy for her to open easily. Given her reduced arm strength, she struggles to pull the doors open while managing her wheelchair at the same time. The excessive weight of the doors prevents her from accessing frozen products independently, forcing her to rely on assistance. This difficulty in handling the freezer doors makes her feel discouraged from visiting the store.
- 27.4.8. The barriers on La Hacienda Meat Center could be eliminated by repaving the access route from the parking lot to ensure a smooth and stable surface. The main glass door with a white frame should be replaced or equipped with an automatic opening system to eliminate the difficulty of pushing a heavy door. Display cases must be lowered or redesigned to ensure visibility and access to the products. Narrow aisles should be widened to allow unobstructed circulation. High shelves need to be adjusted to a reachable height, or assistance must be readily available to retrieve items. Freezers should be positioned at an accessible height, and their doors must be equipped with lighter mechanisms or automatic opening options to facilitate their use. These improvements would remove significant obstacles, making it easier for Mrs. Dalia Vázquez to navigate and access products independently, preventing her from feeling discouraged from visiting the establishment.
- 27.5. Furthermore, the Municipality of Dorado has not only failed to enforce accessibility regulations but has also illegally issued use permits that allow Mahi Mahi Shopping Village and the businesses within it to operate without ensuring proper access. By granting permits to businesses that do not provide adequate accessibility, the Municipality has directly contributed to the exclusion of Mrs. Dalia. This ongoing

failure to comply with accessibility standards reinforces her experience of discrimination, as she continues to encounter physical barriers that prevent her from entering and navigating the establishment.

Responsibility of the Commonwealth of Puerto Rico; the Municipality of Dorado; Plaza Dorada, Inc. - Plaza Dorada Shopping Center; Apple Caribe, Inc. - Applebee's Grill + Bar; Conceptos; Metropol Dorado, Inc.- Metropol Dorado; Brodersen Enterprises Of Puerto Rico, Inc. - Popeyes - Dorado

28. The Plaza Dorada Shopping Center offers a wide variety of stores, including fashion, technology, home goods, and various services, making it a one-stop destination for all shopping needs. It also features dining options such as restaurants and cafés, providing a complete and enjoyable experience for visitors. The variety of offerings and the convenience of having everything in one place make Plaza Dorada an attractive location for shoppers. For this reason, Mrs. Dalia Vázquez is eager to visit the shopping center, as it presents many options she enjoys. However, since November 2024, she has been dissuaded from doing so due to the architectural barriers present in the shopping center, which limit her ability to navigate the space comfortably and independently. Still, she is excited about the possibility of visiting Plaza Dorada in the summer of 2025, although she is concerned about encountering these barriers:

28.1. Inaccessible Sidewalk: Mrs. Dalia Vázquez, who uses a motorized wheelchair, faces accessibility issues at Plaza Dorada Shopping Center due to narrow, poorly maintained sidewalks and misaligned ramps. These obstacles hinder her independence, making it unsafe and frustrating for her to visit the center.

28.1.1. Inadequate Sidewalk: Due to her medical condition, which requires her to use a motorized wheelchair for mobility, Mrs. Dalia Vázquez has noticed that the sidewalks around the Plaza Dorada Shopping Center are narrow and poorly maintained. They are often covered with grass, making them slippery and difficult to navigate safely. The combination of these conditions directly affects

her ability to move independently, as she must maneuver carefully to avoid falls or accidents. Furthermore, the sidewalks are obstructed by signs, billboards, and palm trees, further reducing the available space and forcing her to stop frequently to navigate around the obstacles. This lack of accessibility in the surrounding area makes it difficult for her to leave her home and go to the shopping center, and the physical barriers make her feel insecure and frustrated. Due to these obstacles, Mrs. Dalia has been dissuaded from visiting the shopping center, as she fears facing difficulties that could affect her comfort and safety while moving.

28.1.2. Access Ramp: In addition to the difficulties with the sidewalks, the access ramps at the Plaza Dorada Shopping Center also present a significant issue for Mrs. Dalia. The ramps lack proper curbs and are not correctly aligned, causing the slope to be directed incorrectly, not perpendicular to the sidewalk. Due to her medical condition, Mrs. Dalia requires well-designed ramps to move safely and without needing assistance. Misaligned or poorly placed ramps create insecurity and can increase the risk of detours or falls, which is particularly concerning for her. Every time she attempts to navigate these areas, she is forced to exert additional effort or stop, which interrupts her movement and makes her feel vulnerable. This lack of accessibility with the ramps further discourages Mrs. Dalia and completely dissuades her from visiting the shopping center, as she knows she will encounter barriers that limit her independence and well-being.

28.1.3. Illegal Parking: Mrs. Dalia Vázquez is aware that, although Plaza Dorada has a designated parking lot, many people park their vehicles incorrectly, in front of the sidewalk, blocking access to it. Mrs. Dalia, who uses a motorized

wheelchair, is forced to stop and ask for help to maneuver around the illegally parked vehicles. This improper parking reduces her autonomy and makes her feel unsafe, as she cannot move freely on the sidewalk or access the shopping center. This barrier discourages her from visiting the shopping center, as she cannot rely on safe and proper access to the place, and ultimately discourages her from visiting due to the lack of access.

- 28.1.4. The Commonwealth of Puerto Rico has the responsibility to ensure that public infrastructures, such as sidewalks and access ramps to shopping centers along State Highway #693, are accessible to all individuals, including those with disabilities or medical conditions that require the use of a motorized wheelchair, as is the case with Mrs. Dalia Vázquez. Sidewalks must be properly paved, free of obstructions such as grass, signs, billboards, or illegally parked vehicles that block access and create further difficulties. Additionally, access ramps must be correctly aligned, with safe slopes and appropriate curbs to prevent falls and ensure safe mobility. Despite these barriers, the Commonwealth of Puerto Rico has not taken action to address these issues, leaving Mrs. Dalia in a vulnerable and disadvantaged position. The Commonwealth is obligated to ensure that these measures are implemented, promoting an inclusive environment that facilitates Mrs. Dalia's mobility. The lack of intervention by the authorities has made Mrs. Dalia feel discouraged from visiting the shopping center, as she knows she will face obstacles, such as illegal parking, that limit her independence and comfort.
- 28.2. Accessible Parking and Routes: Mrs. Dalia Vázquez is aware that, although Plaza Dorada has a designated parking lot, there are very few spaces specifically reserved for accessible parking, and those that exist are not clearly marked with the appropriate

signage. The accessible parking spaces that are available often lack the proper symbols, such as the universally recognized wheelchair icon, or are not positioned in areas that allow for easy access to the building. Mrs. Dalia faces difficulty parking in these spaces, as they are often occupied by vehicles that do not respect the designated spots or are not clearly marked. Additionally, the access routes from these parking spaces are not always clearly marked or wide enough to accommodate her wheelchair, making it even more challenging for her to navigate from her car to the shopping center. This lack of accessible parking spaces and proper signage reduces her autonomy and makes her feel unsafe, as she cannot rely on convenient and appropriate parking when visiting the mall. This barrier discourages her from going to Plaza Dorada, as she cannot be certain that she will have a safe and accessible parking spot, further limiting her independence and comfort.

- 28.3. Limited Accessibility Inside the Establishment: Mrs. Dalia Vázquez is aware that inside Plaza Dorada Shopping Center, the tables in both the food court and around the shopping center are designed with bases that block front access. Due to her use of a motorized wheelchair, Mrs. Dalia needs to access the tables directly from the front, but the current designs prevent this access. This forces her to rely on the assistance of others to sit down and enjoy her meal, which limits her independence and diminishes her experience within the establishment. The barrier of inaccessible tables discourages her from enjoying the place, as she cannot interact with the environment comfortably and autonomously.
- 28.4. To address the barriers faced by Mrs. Dalia Vázquez, Plaza Dorada Shopping Center should take several steps to improve accessibility. First, the center should increase the number of accessible parking spaces, ensuring they are clearly marked with the appropriate signage, such as the wheelchair icon, and located in close proximity to the

entrance for easy access. Regular monitoring and enforcement should be put in place to prevent illegal parking in these spaces. Additionally, access routes from the parking lot to the building should be clearly marked, free of obstructions, and wide enough to accommodate motorized wheelchairs, allowing smooth and independent navigation. Inside the shopping center, the tables should be redesigned with open bases to provide front access for wheelchair users, allowing Mrs. Dalia and others to sit independently and comfortably. These changes would enhance her autonomy and overall experience, ensuring a more inclusive and accessible environment at Plaza Dorada.

28.5. Once these barriers are addressed, Mrs. Dalia Vázquez will visit in the summer the Plaza Dorada Shopping Center with enthusiasm. She wants to enjoy the shops, restaurants, and the food court, where she will be able to comfortably access the spaces and enjoy the variety of products and services the place offers. Improvements in accessibility would allow her to explore the shopping center independently, without having to rely on others for assistance in navigating the space. The opportunity to enjoy an inclusive and safe environment would motivate her to return and make the most of her experience at Plaza Dorada.

29. Mrs. Dalia is interested in accessing several businesses within Plaza Dorada Shopping Center, as they offer products and services she likes to enjoy. However, she faces difficulties due to architectural barriers present in some of these establishments, which limit her mobility and access to their facilities. Businesses like Applebee's Grill + Bar, Metropol Dorado, and Popeyes, are part of the shopping center, and for Mrs. Dalia, it is important to access these places comfortably and independently. However, the current barriers in these businesses restrict her right to enjoy the services they offer, negatively affecting her experience and autonomy.

29.1. Responsibility of Plaza Dorada, Inc. and Apple Caribe, Inc.- Applebee's Grill + Bar.: During her visits to Plaza Dorada Shopping Center, Mrs. Dalia Vázquez has developed a special appreciation for Applebee's Grill + Bar, a restaurant known for its exquisite Double Glazed Baby Back Ribs, as well as the variety of BBQ sauces, both the classic version and the chipotle one, which she particularly enjoys. The opportunity to savor their margaritas, which also excites her, adds to the unique experience she has always associated with this place. However, since December 2024, Mrs. Vázquez has become aware of several architectural barriers within the restaurant that directly affect her access and enjoyment of the space. These barriers, by preventing her from moving comfortably, have not only disrupted her ability to enjoy the food and drinks she loves but also impacted her autonomy, as, due to her quadriplegia, she relies on an accessible environment to interact with the space in a safe and independent manner. Mrs. Vázquez intends to return to Applebee's Grill + Bar in June 2025, with the desire to once again enjoy her favorite ribs and margaritas in a relaxed and comfortable atmosphere. However, the persistence of the accessibility barriers completely discourages her from doing so, as she feels these limitations prevent her from enjoying the experience fully, just like any other customer. The barriers she has identified are as follows:

29.1.1. Narrow Entrance: The entrance to the restaurant is excessively narrow for Mrs. Dalia Vázquez due to her health condition, which requires her to use a motorized wheelchair for mobility. The narrowness of the door significantly limits her ability to maneuver, making it difficult for her to enter smoothly and without effort. The reduced opening forces Mrs. Vázquez to carefully adjust her position, turning the entry into a complicated and stressful process. Additionally, the difficulty increases when she must open the door while trying

to pass through, as she has to coordinate both actions with insufficient space to do so comfortably. The lack of adequate space prevents Mrs. Dalia from entering independently, leaving her with no choice but to ask for assistance in order to enter. This obstacle discourages her from returning to the restaurant, as she knows she will face this barrier every time, negatively affecting her experience and autonomy.

29.1.2. Table and Chair Arrangement: Mrs. Dalia is aware that the café-black tables and chairs are placed too close to each other, significantly reducing the space available to maneuver her wheelchair. This poor arrangement forces her to navigate through tight spaces, increasing the likelihood of accidental collisions. The limited room requires her to make difficult and precise movements to avoid obstacles, which is especially challenging due to her restricted arm mobility. The lack of adequate spacing makes it unnecessarily difficult for her to move comfortably and independently within the restaurant. Knowing this discourages her from going to the establishment.

29.1.3. Inaccessible Tables: Mrs. Dalia is aware that the tables have a black base that obstructs proper frontal access, making it difficult for her to position her wheelchair comfortably. The design does not provide enough space for her legs, forcing her into an awkward and impractical posture. Furthermore, there are no tables designed to accommodate individuals with disabilities or reduced mobility, leaving her without a suitable seating option. This lack of accessibility makes her feel unwelcome in the space.

29.1.4. High and Shallow Counter: Mrs. Dalia is aware that the counter is too high and lacks depth, making personal transactions difficult for her. From her wheelchair, her line of sight is limited, preventing her from clearly seeing the

surface or interacting comfortably with staff. This height disparity forces her to speak louder to be heard and rely on others to complete simple transactions that should be accessible to everyone. The inability to carry out these interactions independently adds to her frustration and discomfort and she feels discouraged to visit.

29.1.5. **Narrow and Inaccessible Restrooms:** Mrs. Dalia is aware that the restrooms are too narrow, making it difficult for her to enter and maneuver her wheelchair with ease. The restricted space forces her into uncomfortable and impractical positions, limiting her ability to use the facilities independently. The lack of accessibility not only creates a physical barrier but also compromises her dignity by making a basic necessity unnecessarily challenging. Facing these difficulties discourages her from going to the restaurant.

29.1.6. **Applebee's Grill + Bar** can address the barriers that affect Mrs. Dalia by making key accessibility improvements. Widening the entrance would allow her to enter without struggling to maneuver or needing assistance. Rearranging the tables and chairs to create more space would prevent her from having to navigate through tight areas and avoid unnecessary collisions. Providing accessible tables without restrictive bases would allow her to sit comfortably without difficulty. Lowering the counter or adding an accessible section would enable her to complete transactions independently without having to strain or rely on others. Expanding the restrooms to provide enough space for her wheelchair would allow her to use the facilities with dignity and without unnecessary challenges. These changes would ensure that Mrs. Dalia can visit the restaurant comfortably and without feeling discouraged by accessibility barriers.

29.2. Responsibility of Plaza Dorada, Inc. and Metropol Dorado, Inc.- Metropol Dorado: Seafood lovers easily recognize a good restaurant by the freshness of the ingredients and the quality of the dishes it offers. Mrs. Dalia Vázquez, being a big fan of seafood, knows that Metropol Restaurant & Bar is known for serving some of the best seafood in Dorado. This restaurant stands out for its focus on fresh dishes, prepared with high-quality ingredients and an excellent combination of flavors that make it special. Its warm atmosphere and personalized service contribute to creating a unique experience for those who enjoy good food, which is why Mrs. Dalia loves to visit between June and August, 2025. However, despite her enthusiasm to try the delicious offerings of the place, Mrs. Dalia has felt discouraged from visiting Metropol Restaurant & Bar since January 2025, due to the following architectural barriers present at the establishment, which make it difficult for her to access and limit her mobility, interrupting her independence and making her feel uncomfortable:

29.2.1. Tables: Mrs. Dalia Vázquez is aware that at Metropol Restaurant & Bar, the tables have bases that block front access. Since she uses a motorized wheelchair, Mrs. Dalia needs to approach the tables directly from the front in order to sit. However, the base of the tables prevents this access, forcing her to rely on the help of others to sit down. This limits her autonomy and makes her feel uncomfortable, as she cannot enjoy the experience independently. This barrier discourages her from visiting the restaurant, as she cannot interact with the environment freely and comfortably.

29.2.2. Counters: Mrs. Dalia Vázquez is aware that at Metropol Restaurant & Bar, the counters are too high and lack sufficient depth, making access difficult for people who use a motorized wheelchair, like herself. Additionally, the chairs around the counter obstruct the path, creating another barrier. Due to her

quadriplegia, Mrs. Dalia needs to be able to approach the counter directly to interact with the staff, but this design prevents that, forcing her to rely on others for assistance to place her order or receive service. This reduces her independence and makes her feel uncomfortable, which discourages her from visiting the restaurant.

29.2.3. Space Between Tables: Mrs. Dalia Vázquez is aware that inside Metropol Restaurant & Bar, the space between the tables is very narrow, which makes it difficult for her to navigate with her motorized wheelchair. Due to her limited mobility, Mrs. Dalia cannot maneuver easily in tight spaces, forcing her to stop and ask for help in order to move between the tables. This interrupts her mobility and limits her ability to enjoy the place autonomously. The lack of sufficient space to move freely discourages her from visiting the restaurant, as she cannot fully enjoy the experience without feeling restricted.

29.2.4. To address the identified barriers at Metropol Restaurant & Bar, the tables should be redesigned with open bases or at a greater height to allow for front access without obstacles. This would allow Mrs. Dalia to approach directly and sit down independently. Regarding the counters, an accessible area should be installed at wheelchair height, with a lower and deeper counter to facilitate interaction, as well as removing chairs that obstruct the path or replacing them with removable chairs that do not block access. As for the space between the tables, the restaurant could reconfigure the table layout, expanding the aisles and ensuring there is a minimum of 1.5 meters of space so that Mrs. Dalia can maneuver without difficulty. Additionally, installing clear signage to indicate accessible routes and prioritizing the arrangement of furniture would ensure free and comfortable circulation for Mrs. Dalia. These adjustments would

ensure that she can enjoy a comfortable and independent experience within the restaurant.

29.2.5. Once the barriers are resolved, Mrs. Dalia Vázquez would be excited to visit Metropol Restaurant & Bar because she has heard so much about the exceptional quality of the seafood and the inviting atmosphere of the place. She loves seafood and is always on the lookout for great dining experiences, and Metropol is known for its delicious and fresh seafood dishes. With the barriers removed, she would finally be able to enjoy the restaurant independently, savoring her favorite dishes in a comfortable environment. The accessibility improvements would make it possible for her to experience the restaurant without relying on assistance, which would enhance her overall enjoyment and sense of freedom while dining out.

29.3. Responsibility of Plaza Dorada, Inc. and Brodersen Enterprises Of Puerto Rico, Inc.- Popeyes: Mrs. Dalia Vázquez has wanted to visit Popeyes, specifically the location in Plaza Dorada Shopping Center, for a long time, as she loves the chicken served at the restaurant, known for its unique flavor and excellent quality. The combination of fresh chicken and the cozy atmosphere makes the place special to her, as she really enjoys the delicious and well-prepared food. However, since November 2024, Mrs. Dalia has been discouraged from visiting the restaurant due to the architectural barriers present at the location. Still, Mrs. Dalia holds on to the hope of being able to visit the restaurant before November 2025, wishing that the following difficulties in accessing the establishment with her motorized wheelchair, which have led her to avoid the place, will be resolved:

29.3.1. Inaccessible Entrance: Mrs. Dalia Vázquez is aware that at Popeye – Dorado, the entrance is blocked by a staircase, making it impossible to access with her

motorized wheelchair. As a quadriplegic, she requires a level and unobstructed entry to enter the place, but the staircase forces her to rely on the help of others, limiting her independence and autonomy. This barrier prevents her from enjoying the restaurant on her own and discourages her from visiting the place.

29.3.2. Inadequate Service Counter: The service counter at Popeye – Dorado is too high and lacks depth, preventing Mrs. Dalia from approaching it properly with her motorized wheelchair. Due to her condition, she needs to interact directly with the counter, but the current design forces her to rely on others for assistance in placing her order. This affects her comfort and autonomy, as she cannot enjoy the service independently.

29.3.3. Inaccessible Table Design: At Popeye – Dorado, the tables have bases that block front access, preventing Mrs. Dalia from approaching them directly to sit down. With her motorized wheelchair, she needs an unobstructed access to enjoy her meal, but the table design forces her to rely on external assistance to sit down. This limits her autonomy and makes her feel uncomfortable, discouraging her from visiting the restaurant.

29.3.4. Insufficient Space to Maneuver: Inside Popeye – Dorado, the space between the tables is so narrow that it makes it difficult for Mrs. Dalia to maneuver with her motorized wheelchair. Due to her limited mobility, she finds it challenging to navigate these tight spaces without having to stop or ask for help. The lack of sufficient space to move freely interrupts her experience and discourages her from visiting the restaurant, as she cannot enjoy the place independently.

29.3.5. To address the accessibility barriers at Popeye – Dorado, several specific solutions need to be implemented. First, the entrance should be modified to

install a ramp with a gentle slope, meeting accessibility standards, and with a minimum width of 36 inches to allow access for motorized wheelchairs. Regarding the service counter, it should be lowered to an accessible height between 28 to 34 inches, with greater depth to allow Mrs. Dalia to approach directly. It would also be helpful to cut or redesign a section of the counter so that she can interact with the staff without obstacles. For the tables, the bases need to be redesigned to ensure there is free and sufficient space for frontal access from the wheelchair, with a minimum height of 28 inches from the floor to the bottom edge of the table, without bases blocking access. Finally, the aisles between the tables should be wider, with a minimum of 36 inches, to allow Mrs. Dalia to move easily between them without needing assistance. These modifications would allow Mrs. Dalia to enjoy the experience at the restaurant independently and comfortably.

- 29.3.6. If these barriers are addressed, Mrs. Dalia Vázquez would be delighted to visit Popeye – Dorado. As a lover of chicken and quality food, she knows that the restaurant offers a delicious menu and is very popular in the area. The opportunity to enjoy her favorite food in a comfortable and accessible environment would be an experience that allows her to fully enjoy the restaurant's offerings. Without the architectural barriers that currently limit her, she could enjoy a meal independently, without needing assistance from others to move or interact with the surroundings. This would allow her to experience the restaurant without restrictions, motivating her to visit regularly.
- 29.4. On the other hand, the Municipality of Dorado has failed to enforce accessibility regulations and has improperly issued use permits, allowing shopping centers and the businesses within them to operate without ensuring proper access. By authorizing an

establishment that lacks an accessible entry route and permitting conditions that obstruct access, the Municipality has directly contributed to the exclusion of individuals like Mrs. Dalia Vázquez. This failure to comply with accessibility standards reinforces her sense of discrimination, as she is systematically denied the opportunity to access and enjoy the shopping center and its businesses on equal terms with other visitors.

Responsibility of the Commonwealth of Puerto Rico; Municipality of Dorado; Dorado Shopping Center Development Corp. - Doramar Plaza; El Meson De Felipe, Inc. - El Meson Sandwiches; Multisystems Restaurants, Inc.- Sizzler Rest Dorado and 2 The Moon LLC-Taco Maker

30. Mrs. Dalia Vázquez wants to visit Doramar Plaza because it is a quiet and safe place with a great variety of fast food options for dinner. She likes that the site is clean and conveniently located near the highway and Road #2. She finds the diverse restaurant selection appealing, from Wendy's and Church's to Chili's and Sizzler. She is also interested in exploring the large Capri store and browsing the various jewelry and clothing shops in the plaza. However, since November 2024, she has known that this place has architectural barriers that prevent her from accessing it freely. Due to her quadriplegia and reliance on a wheelchair, these difficulties have discouraged her from visiting. In December 2024 and January and February 2025, she has wanted to visit because she enjoys dining out and trying different food options. She is also interested in shopping for household items and browsing the stores for new products. But, the architectural barriers she is aware of make it difficult for her to navigate the plaza comfortably, which has dissuaded her from going. In the next two months, Mrs. Dalia Vázquez is eager to visit Doramar Plaza to dine at one of the restaurants and explore the stores for special deals. She also looks forward to stopping to enjoy fresh food. However, the architectural barriers in the plaza create accessibility challenges for her, making it difficult to move around comfortably, discouraging her from visiting. The barriers she is aware of are the following:

30.1. Obstacles on the Sidewalks Around Doramar Plaza: The sidewalks surrounding Doramar Plaza located at Exit #24 of Expressway 22, Hwy. #693, Dorado, PR 00646-0000 with coordinates 18.422283163126153, - 66.26711879626183, create serious challenges for Mrs. Dalia Vázquez, who relies on a motorized wheelchair for mobility. Cracks, uneven pavement, and broken sections make it difficult for her to navigate smoothly, leading to uncomfortable jolts and requiring extra effort. Additionally, overgrown grass has encroached on the pathway, further restricting space and increasing the risk of her wheelchair getting stuck.

30.1.1. Mrs. Dalia Vázquez is aware that the sidewalks around Doramar Plaza are in poor condition. The cracks, uneven surfaces, and broken sections make it difficult for her to maneuver her motorized wheelchair smoothly, causing uncomfortable jolts and requiring extra effort to navigate. Since she cannot adjust her balance and easily compensate for sudden movements, the rough terrain creates an exhausting and frustrating experience. This situation discourages her from visiting Doramar Plaza.

30.1.2. Mrs. Dalia has noticed that the sidewalks around Doramar Plaza have overgrown grass encroaching on the walking path. The excessive vegetation limits the available space, forcing her to navigate around it or risk her wheelchair getting caught in the uneven edges. Because she cannot easily reposition herself or adjust her chair's movement with precision, this obstruction turns a simple path into a challenging and frustrating route. The difficulty of moving through the area makes her feel unmotivated to visit Doramar Plaza.

30.1.3. As a result, the Commonwealth of Puerto Rico is responsible for maintaining the sidewalks along State Highway #693 surrounding Doramar Plaza; however,

its continued inaction has led to significant obstacles for Mrs. Dalia Vázquez. The sidewalks remain in poor condition with cracks and uneven surfaces, while overgrown grass and vegetation further restrict passage. This neglect has made these pathways hazardous and difficult to traverse, preventing her from moving safely through the area. By failing to address these accessibility issues, the Commonwealth has reinforced the barriers that limit her mobility, creating a discriminatory situation that excludes her from fully accessing her surroundings.

- 30.1.4. The barriers on sidewalks and ramps around Doramar Plaza could be eliminated by repairing the deteriorated sidewalks, ensuring a smooth and even surface that allows Mrs. Dalia Vázquez to navigate safely in her wheelchair. Any cracks, uneven sections, or broken pavement should be fixed to prevent unnecessary jolts and discomfort. Additionally, the overgrown grass encroaching on the sidewalks must be regularly trimmed and maintained to keep the pathways clear and unobstructed. By implementing these measures, Mrs. Dalia Vázquez would be able to move freely and comfortably, making her visit to Doramar Plaza a more accessible and pleasant experience.
- 30.2. Limited Number of Accessible Parking Spaces at Doramar Plaza: Mrs. Dalia Vázquez is aware that Doramar Plaza has very few parking spaces designated for people with disabilities. When these spaces are occupied, she does not have a suitable place to park and unload her wheelchair comfortably. Since she requires extra space to maneuver and transfer safely, the lack of accessible parking forces her to look for alternatives that do not meet her needs, making the visit inconvenient and frustrating. This situation discourages her from visiting Doramar Plaza.

30.3. No Accessible Route from Parking of Doramar Plaza to Stores: Mrs. Dalia Vázquez knows that there is no accessible route from the parking lot to the stores at Doramar Plaza. Without a designated and safe path, she encounters obstacles that make movement difficult in her wheelchair. Because she cannot step over curbs and uneven surfaces, she has to take longer, more challenging detours, which require unnecessary effort. The lack of a direct and accessible path makes her feel disheartened about visiting Doramar Plaza.

30.4. Deteriorated Parking Lot Pavement at Doramar Plaza: Mrs. Dalia Vázquez is aware that the pavement in the parking lot at Doramar Plaza is in poor condition, with cracks, potholes, and uneven surfaces. These defects make it difficult for her to move smoothly in her wheelchair, causing sudden jolts and requiring extra effort to maintain control. Since she cannot adjust to rough terrain, navigating through the parking lot becomes an uncomfortable and exhausting experience. This barrier makes her feel unmotivated to visit Doramar Plaza.

30.5. The barriers on Doramar Plaza could be eliminated by increasing the number of designated accessible parking spaces and ensuring they are properly marked with vertical signage featuring the universal accessibility symbol. A clearly defined and smooth-access route from the parking area to the stores must be established, incorporating curb cuts and ramps where necessary. The deteriorated pavement in the parking lot should be repaired by filling cracks, leveling and uneven surfaces to ensure a stable and continuous path. These measures can significantly improve mobility and create a safer, more accessible environment at Doramar Plaza.

31. Mrs. Dalia is interested in visiting several businesses within Doramar Plaza, including El Meson Sandwiches, Sizzler Rest Dorado, and Taco Maker. However, she faces difficulties due to architectural barriers in these establishments, which limit her mobility and access to their

facilities. These barriers affect her experience and restrict her right to fully enjoy the services they offer. Since these businesses are located within the shopping center, it is also the responsibility of Dorado Shopping Center Development Corp. to ensure accessibility to them.

31.1. Responsibility of Dorado Shopping Center Development Corp. and El Meson De Felipe, Inc. - El Meson Sandwiches Dorado: During her visits to Doramar Plaza, Mrs. Dalia Vázquez particularly enjoys El Meson Sandwiches, an establishment well known for its wide variety of freshly made sandwiches, prepared with high-quality ingredients. Among her favorites are the classic sandwiches, which offer traditional flavors that never disappoint, as well as the specialty sandwiches, which feature unique and carefully crafted combinations. She also appreciates the premium selections, which offer more sophisticated options. Mrs. Vázquez also values the fast service and the convenience of parking at the location, making her visit even more convenient.

31.2. However, despite her appreciation for the products offered by the restaurant, since January 2025, Mrs. Vázquez has become aware of several architectural barriers that affect her access and comfort within the establishment. Due to these barriers, she feels discouraged from returning, as they hinder her mobility and her ability to enjoy the space autonomously and safely. Mrs. Vázquez intends to return to El Mesón Sándwiches Dorado in June 2025, with the purpose of enjoying a good sandwich, corn cream, and coffee in a comfortable and accessible environment. However, the continued presence of these accessibility barriers discourages her from doing so, as they directly affect her ability to access the restaurant and fully enjoy her visit independently. The barriers she has identified are as follows:

31.2.1. Damaged Accessible Ramp with Poorly Positioned Handrails: Mrs. Dalia is aware that the ramp designated as accessible is in poor condition, making it

difficult for her to use safely. The surface is uneven, creating instability as she maneuvers her wheelchair. Additionally, the handrails are not properly positioned, as they begin too far from the start of the ramp, preventing her from maintaining proper support from the moment she begins ascending or descending. The lack of a well-maintained and fully functional ramp makes access unnecessarily difficult, discouraging her from visiting the establishment.

31.2.2. Overly High Service Counter: Mrs. Dalia is aware that the service counter is too high, making personal interactions difficult. From her wheelchair, she is unable to see the surface properly, which prevents her from comfortably placing an order or communicating with staff. The excessive height forces her to strain her arms to reach or speak louder to be heard, making what should be a simple interaction a frustrating experience. The inability to conduct personal transactions independently discourages her from visiting the establishment.

31.2.3. High Payment Counter That Makes Transactions Difficult: Mrs. Dalia is aware that the payment counter is also too high, creating another significant barrier. The excessive height makes it difficult for her to handle cash, a card, or sign receipts, forcing her into an uncomfortable and impractical position. This design prevents her from completing transactions with ease, making her feel dependent on others for a process that should be simple and accessible. The difficulty in conducting payments independently discourages her from visiting the establishment.

31.2.4. Poor Table Arrangement That Restricts Movement: Mrs. Dalia is aware that the tables are placed too close together, significantly limiting the space available for movement. The narrow gaps between them make it difficult for

her to navigate the area freely, forcing her to make tight turns or struggle to pass through without obstacles. This poor distribution prevents her from moving comfortably and accessing seating without unnecessary effort. The restricted space makes her feel unwelcome, discouraging her from visiting the establishment.

31.2.5. Tables with Gray Base That Block Frontal Access: Mrs. Dalia is aware that the tables in the establishment have a gray base that obstructs frontal access, preventing her from positioning her wheelchair properly. The lack of knee clearance forces her into an awkward and uncomfortable posture, making it difficult to dine comfortably. Additionally, the other tables are attached to the wall and are too high, making it impossible for her to sit at them in a way that accommodates her wheelchair. The absence of accessible seating makes her feel excluded, discouraging her from visiting the establishment.

31.2.6. Small Restroom with Insufficient Maneuvering Space: Mrs. Dalia is aware that the restroom is too small, making it extremely difficult for her to enter and maneuver her wheelchair. The lack of adequate space prevents her from positioning herself comfortably, forcing her into impractical and restrictive movements. The confined layout does not provide the necessary accessibility features for independent use, affecting her dignity and comfort. The inability to use the restroom without significant difficulty discourages her from visiting the establishment.

31.2.7. El Meson Sandwiches can address these accessibility barriers by repairing the accessible ramp, ensuring a smooth, stable surface, and repositioning the handrails so they provide proper support from the beginning of the incline. The service and payment counters should be lowered or include an accessible

section to allow Mrs. Dalia to interact with staff and complete transactions independently. The table arrangement should be adjusted to create adequate spacing for free movement, while accessible tables with proper knee clearance should replace those with obstructive bases. Additionally, wall-attached and overly high tables should be replaced with lower, accessible seating options. Finally, the restroom should be expanded to provide sufficient maneuvering space, ensuring that Mrs. Dalia can use the facilities comfortably and independently. Implementing these changes would create an inclusive and welcoming environment, allowing her to enjoy El Meson Sandwiches without unnecessary barriers.

31.3. Responsibility of Dorado Shopping Center Development Corp. and Multisystems Restaurants, Inc. - Sizzler Rest Dorado: Mrs. Dalia Vázquez is drawn to Sizzler in Doramar Plaza for its renowned salad bar, fresh ingredients, and the wide variety of dishes that make it a standout dining destination. The restaurant's extensive buffet, featuring everything from garlic shrimp and fried chicken to homemade soups and an array of desserts, offers an unmatched selection that allows guests to customize their meals to their preferences. The ability to enjoy a freshly prepared, high-quality meal in a casual and welcoming environment makes Sizzler an appealing choice for her. Additionally, the restaurant's reputation for excellent service and a family-friendly atmosphere adds to its charm. Given its convenient location and the opportunity to savor its diverse food offerings,

31.4. Mrs. Vázquez intends to visit and experience the well-praised buffet firsthand in May 2025 as she has never encountered a restaurant quite like it before. However, since December 2024, she has been aware of several architectural barriers that prevent her from accessing the establishment safely and independently. These obstacles have

consistently discouraged her from visiting, as they make it impossible for her to enjoy the restaurant on equal terms with other patrons. The barriers preventing her access include:

- 31.4.1. **Worn and Uneven Access Ramp:** Mrs. Dalia Vázquez is aware that the access ramp leading to Sizzler is worn down, with faded paint and an uneven surface that lacks smoothness. The lack of clear visual markers caused by the deteriorated paint makes it difficult for her to locate the ramp from a distance, forcing her to approach slowly and with caution to avoid misalignment. Given her limited arm strength and reduced ability to adjust her position, the unstable ramp makes it difficult for her to maintain control of her wheelchair, forcing her to exert additional effort to ascend or descend safely. The inadequate maintenance of the ramp not only increases the risk of discomfort and instability but also compromises her ability to enter the restaurant independently, making what should be a simple approach an exhausting task.
- 31.4.2. **Inaccessible Entrance Doors:** Mrs. Vázquez has noted that the restaurant's entrance consists of French doors that must be pulled outward, with handles positioned at a high level. Due to her quadriplegia, she has limited mobility and strength in her arms, making it nearly impossible for her to grasp and pull open the doors without assistance. The high placement of the handle further restricts her ability to access the restaurant independently, leaving her unable to enter without depending on someone else.
- 31.4.3. **Narrow Pathways Between Tables:** Mrs. Vázquez is aware that the dining area at Sizzler has tables that are positioned too close together, leaving insufficient space for her motorized wheelchair to maneuver comfortably. Due to her quadriplegia, she requires ample room to turn and adjust her position safely.

The restricted layout forces her to take awkward and inefficient routes, getting stuck or having to request assistance, which diminishes her independence and comfort while moving through the restaurant.

- 31.4.4. **Obstructive Table Supports Preventing Proper Seating:** Additionally, the tables have two cylindrical supports on either side, which obstruct the space underneath and preventing Mrs. Vázquez from positioning her wheelchair close enough to dine comfortably. Given her limited arm strength and mobility, she needs to be properly aligned with the table to eat without strain. The obstructive design forces her to sit at an awkward distance, making dining a physically exhausting and frustrating experience.
- 31.4.5. **Inaccessible Buffet Setup:** Mrs. Vázquez has observed that the restaurant's buffet is set at a high level, with no adequate space underneath to allow for frontal access. Due to her quadriplegia, she has severely limited arm strength and mobility, preventing her from extending her arms high enough or maneuvering effectively from her wheelchair to serve herself. As a result, she is entirely dependent on assistance to access the buffet, restricting her autonomy and preventing her from independently selecting her meal like other customers.
- 31.4.6. **High Payment Counter Without Accessible Section:** Mrs. Vázquez is aware that the payment counter at Sizzler is too high and lacks a lower accessible section with space underneath for frontal wheelchair access. Her quadriplegia prevents her from reaching the counter effectively, making it impossible for her to complete a transaction without assistance. This barrier creates an unequal and frustrating experience, as she cannot pay for her meal independently like other customers.

- 31.4.7. Restrooms Without Accessibility Signage: Mrs. Vázquez has noted that the restaurant's restrooms do not have proper accessibility signage, making it unclear whether they are designed to accommodate individuals with disabilities. This lack of indication forces her to rely on trial and error or ask for assistance to determine if she can use the facilities, adding unnecessary stress, inconvenience, and uncertainty to her visit.
- 31.4.8. To ensure that Mrs. Dalia Vázquez can access Sizzler independently and equally, several modifications must be implemented. The access ramp needs to be resurfaced to provide a smooth and stable surface, with clearly marked edges to enhance visibility and safety. The entrance doors should be automated or equipped with an accessible push-button system to accommodate individuals with limited upper body mobility. Inside, tables should be spaced out to allow sufficient room for her motorized wheelchair to maneuver comfortably, and at least one table should have an open design to provide proper clearance. The buffet area should include an accessible section with a lower counter and adequate space underneath for frontal access, allowing her to serve herself without assistance. The payment counter must feature a designated accessible portion at a lower height with knee clearance to enable her to complete transactions independently. Finally, restroom signage must be installed to indicate accessibility, ensuring she can easily identify and use the facilities without additional obstacles. These improvements would not only grant her full access to the restaurant but also encourage her to visit, knowing she can enjoy the dining experience like any other customer.
- 31.5. Responsibility of Dorado Shopping Center Development Corp. and 2 The Moon LLC - Taco Maker: Mrs. Dalia Vázquez, has been drawn to Taco Maker at Doramar Plaza

for its commitment to fresh, high-quality ingredients and its unique approach to Mexican-inspired fast food. She is particularly captivated by the restaurant's dedication to preparing food daily, such as their hand-deboned chicken, house-made enchilada sauce, and freshly fried chips, which set it apart from other fast-food establishments in the area. Mrs. Vázquez is especially interested in their vegetarian options, including the flavorful beans, which she has heard are a standout choice for those seeking meat-free meals. The restaurant's emphasis on supporting local agriculture and its reputation for quick, friendly service further enhance its appeal.

31.6. Mrs. Vázquez intends to visit Taco Maker at Doramar Plaza in the coming months to enjoy its vegetarian options and experience its unique atmosphere. However, since December 2024, Mrs. Vázquez has been aware of architectural barriers that prevent her from accessing the space comfortably, and have consistently discouraged her from attempting to dine there. The barriers that prevent her from accessing are:

31.6.1. Entrance Barrier Due to Outward-Swinging French Doors. Mrs. Vázquez has noted that the entrance to the establishment consists of French doors that open outward, creating a significant challenge for her. Due to her limited upper body strength and restricted arm mobility, she cannot easily grasp and pull the doors open while maneuvering her motorized wheelchair. This design prevents her from entering independently, requiring assistance just to access the restaurant.

31.6.2. Inaccessible Payment and Order Counter. Mrs. Dalia Vázquez is aware that the payment and order counter at The Taco Maker is too high and lacks an accessible section with sufficient clearance underneath for a wheelchair user to approach it comfortably. Given her quadriplegia and reliance on a motorized wheelchair, she cannot position herself close enough to complete a transaction independently. The absence of a designated lower section forces her to depend

on others to place her order and make payments, limiting her autonomy and making the experience less inclusive.

- 31.6.3. Lack of Accessible Seating. Mrs. Vázquez is aware that the restaurant's tables have a central support with extended legs, making it difficult for her to position her wheelchair comfortably. Additionally, there is no designated accessible table available. Her motorized wheelchair requires sufficient space underneath the table for her to dine without obstruction. Because she has limited movement and strength in her arms, she cannot comfortably reach her meal if she is seated too far away. The current setup prevents her from sitting close enough to enjoy her meal comfortably, effectively restricting her ability to dine at the establishment on equal terms with other customers.
- 31.6.4. To ensure accessibility for Mrs. Dalia Vázquez, Taco Maker should modify the order and payment counter by adding a lowered section with sufficient under-counter space to allow frontal access for her motorized wheelchair, enabling her to independently place orders and complete transactions. The French-style entrance door should be replaced with an automatic sliding door. Additionally, at least one accessible table with adequate under-table clearance and no protruding legs should be provided, allowing her to position her wheelchair comfortably for dining. These changes would not only make the establishment fully accessible, but also encourage Mrs. Dalia Vázquez to visit and enjoy The Taco Maker's fresh, high-quality offerings.
- 31.7. Furthermore, the Municipality of Dorado has failed to enforce accessibility regulations and has unlawfully issued use permits that allow Doramar Plaza and the businesses within it to operate in an inaccessible manner. By authorizing a shopping center that lacks an accessible route of entry and permitting conditions that obstruct access, the

Municipality has directly contributed to Mrs. Dalia's exclusion, permitting that Doramar Plaza and the businesses within it continue to operate without ensuring proper accessibility. This failure to uphold accessibility standards reinforces her perception of discrimination, as she is systematically denied the ability to access and navigate the establishment on equal terms.

Responsibility of the Commonwealth of Puerto Rico; Municipality of Dorado, Dorado Shopping Center Development Corp.- Dorado del Mar Shopping Center; Latin American Subs, LLC - Firehouse Subs; Pedro Maldonado Frappe's LLC-Sabor Frappe, The Yellow Door Coffee & Ice Cream Shop LLC-The Yellow Door, Coffee & Ice Cream Shop.

32. Mrs. Dalia Vázquez has been looking forward to visiting Dorado del Mar Shopping Center, a vibrant destination in Dorado renowned for its diverse array of shops, restaurants, and services. The center hosts popular establishments such as Sabor Frappe, Firehouse 1324 Dorado, and The Yellow Door, offering a wide variety of dining options. What makes this shopping center unique is its open-air design with stunning ocean views, creating a relaxing and inviting atmosphere that combines shopping with a coastal experience. Given the center's convenient location, Mrs. Vázquez finds it an ideal place to enjoy shopping and dining. She plans to visit the shopping center in the coming months to enjoy her favorite spots to dine. However, since December 2024, she has been aware of several architectural barriers in the shopping center that prevent her from accessing safely and independently. The presence of these barriers continue to deter her from visiting and has significantly impacted her plans to enjoy the shopping and dining experience at the center. The barriers that have discouraged her from visiting include:

32.1. Narrow and Deteriorated Sidewalks Along PR-693: Mrs. Dalia Vázquez is aware that the sidewalks in front of the shopping center adjacent to State Road 693 are extremely narrow and in poor condition, with numerous bumps and cracks; some sections are even crumbling. These conditions present significant challenges for her as a

quadriplegic using a motorized wheelchair, making navigation along these sidewalks unsafe and difficult.

- 32.1.1. Since the sidewalks along PR-693 fall under the jurisdiction of the Commonwealth of Puerto Rico, it is solely the responsibility of the Commonwealth to ensure these public spaces are accessible to people with disabilities. However, the Commonwealth has failed to address the significant hazards posed by the narrow and deteriorated sidewalks. This ongoing neglect has created an unsafe environment, and as a result, Mrs. Vázquez has been discouraged from attempting to visit the Dorado del Mar Shopping Center, as the lack of proper sidewalk maintenance severely limits her independence and access to the area.
- 32.1.2. Additionally, the Municipality of Dorado holds responsibility for the sidewalks surrounding the Dorado del Mar Shopping Center that fall within its jurisdiction. These sidewalks, like others in the area, are in poor condition, with uneven surfaces, cracks, and obstacles that hinder safe access for individuals with disabilities. The municipality's failure to properly maintain and address these issues has created significant barriers for Mrs. Vázquez and others, limiting their ability to navigate the area safely. As the local authority, the Municipality of Dorado is obligated to ensure that these public pathways are accessible and well-maintained, but its inaction has perpetuated the exclusion and discrimination faced by individuals like Mrs. Vázquez.
- 32.2. **Insufficient and Poorly Marked Accessible Parking Spaces:** Mrs. Vázquez has noticed that not all accessible parking spaces at the shopping center are clearly marked with the International Symbol of Accessibility, and there appears to be an inadequate number of accessible spaces relative to the total parking capacity. This lack of proper

signage and insufficient accessible parking makes it challenging for her to find suitable parking for her adapted vehicle, hindering her ability to access the shopping center conveniently.

32.3. To address the accessibility barriers Mrs. Dalia Vázquez faces, the Commonwealth of Puerto Rico and the Municipality of Dorado must take responsibility for the narrow and deteriorated sidewalks along PR-693. These public spaces should be widened, repaired, and properly maintained to provide a smooth, safe, and accessible route for people with disabilities. This includes addressing the cracks, bumps, and crumbling sections, and ensuring the sidewalks are at least 36 inches wide to accommodate wheelchair users. On the other hand, the Dorado del Mar Shopping Center must ensure that accessible parking spaces are properly marked with the International Symbol of Accessibility and that the number of spaces is increased to meet the needs of visitors with disabilities. These improvements would help restore Mrs. Vázquez's independence and make it possible for her to visit the shopping center without unnecessary barriers.

33. Mrs. Dalia intends to explore her favorite shops and eateries at Dorado del Mar Shopping Center, such as Firehouse Subs, Sabor Frappe, and The Yellow Door Coffee & Ice Cream Shop. Unfortunately, she has encountered significant challenges due to the lack of accessibility in these locations. Structural barriers within the establishments make it difficult for her to move freely and access their services comfortably. This not only diminishes her overall experience but also prevents her from fully utilizing the amenities available. As the managing entity of the shopping center, Dorado Shopping Center Development Corp. has a responsibility to ensure that all businesses within its premises are accessible to everyone, including individuals with mobility limitations. Addressing these issues is essential to creating an inclusive environment for all visitors.

- 33.1. Responsibility of Dorado Shopping Center Development Corp. and Latin American Subs, LLC - Firehouse Subs: Mrs. Dalia Vázquez enjoys good food and knows that at Firehouse 1324 Dorado, she can find high-quality hot and cold sandwiches, complemented by a variety of spicy sauces. She finds this location very convenient, as it is situated in the Dorado del Mar Shopping Center, allowing her to visit other stores while enjoying a delicious sandwich in a charming setting. She is particularly fond of the turkey sandwich, which stands out for its fresh ingredients and exceptional taste. Additionally, she appreciates the restaurant's clean and inviting atmosphere, which enhances her overall experience. The attentive and friendly staff also contribute to a pleasant visit.
- 33.2. However, since December 2024, Mrs. Vázquez has been aware of the architectural barriers at the establishment that impact her experience, making her feel discouraged from visiting. In January and February 2025, she has wanted to dine at Firehouse 1324 Dorado to enjoy a meal and experience its specialty dishes in the restaurant's welcoming atmosphere. Unfortunately, the accessibility barriers have made it difficult for her to visit, as they hinder her ability to comfortably access the space. Over the next three months, she hopes to visit the restaurant to enjoy its unique menu, especially the turkey sandwich, which remains a top choice due to its fresh ingredients and outstanding flavor. She also looks forward to enjoying the restaurant's well-maintained and aesthetically pleasing environment, which further elevates her dining experience. Despite her interest in dining at Firehouse 1324 Dorado, the architectural barriers she is aware of continue to discourage her from visiting, making it challenging for her to fully enjoy the restaurant. The barriers she is aware of are the following:

- 33.2.1. Access Route from the Parking Lot in Poor Condition: Mrs. Dalia Vázquez is aware that the access route from the parking lot is in poor condition. Due to her quadriplegia, she relies entirely on her Permobil M300 power wheelchair to move around. The uneven and damaged surface makes it difficult for her to maneuver safely, causing discomfort and requiring extra effort to navigate. This situation increases her dependence on assistance, making the experience stressful and frustrating. For this reason, she feels discouraged from visiting Firehouse 1324 Dorado.
- 33.2.2. Door Too Heavy: Mrs. Dalia recognizes that the entrance door is too heavy. With her limited upper body strength, especially in her right arm, opening a heavy door independently is nearly impossible. This forces her to wait for assistance and struggle to enter, making the visit unnecessarily challenging and inconvenient. As a result, she feels dissuaded from going to the establishment.
- 33.2.3. Table Layout Affects Circulation: Mrs. Dalia Vázquez notices that the distribution of the tables affects circulation. As she navigates the space in her wheelchair, she encounters obstacles that make movement difficult. The layout requires her to take longer, more complicated paths and struggle to fit between tables, making her visit unnecessarily challenging. Because of this, she feels unmotivated to go to the restaurant.
- 33.2.4. Counter Too High: Mrs. Vázquez is aware that the white counter with a red surface is too high. Seated in her wheelchair, she cannot comfortably see over it and interact with staff at eye level. This limits her ability to place an order and engage in a customer experience without relying on others. The situation makes her feel excluded and discouraged from visiting the restaurant.

- 33.2.5. Lower Section of the Counter Blocked: Mrs. Dalia Vázquez notices that the lower section of the counter is obstructed by candy dispensers, advertisements, and other elements. This prevents her from accessing the designated lower area meant for seated customers, forcing her to struggle to reach the counter. The obstruction creates an unnecessary barrier that makes her visit uncomfortable and inconvenient. Because of this, she feels unmotivated to go to the establishment.
- 33.2.6. Counter Too Shallow: Mrs. Dalia Vázquez has observed that the white counter with a red surface is too shallow. Since she uses a power wheelchair, she needs enough space to position herself comfortably close to the counter. The lack of depth prevents her from pulling in properly, making transactions difficult and requiring her to stretch beyond her comfortable range. This experience makes her feel unwelcome and reluctant to visit the restaurant.
- 33.2.7. Tables with Support Bars Underneath: Mrs. Dalia Vázquez is aware that the tables have support bars underneath. These bars prevent her from rolling her wheelchair in fully, forcing her to sit at an awkward angle. This limitation makes dining uncomfortable and restricts her ability to enjoy a meal independently. As a result, she feels discouraged from going to the establishment.
- 33.2.8. The barriers on Firehouse Subs Dorado could be eliminated by ensuring the access route from the parking lot is smooth and well-maintained to allow safe and effortless wheelchair navigation. The entrance door should have an automatic opener or be replaced with a lighter door to facilitate independent entry. The table layout must be adjusted to improve circulation, ensuring wide, unobstructed pathways. The white counter with a red surface must be lowered to

an accessible height, and the lower section should remain unobstructed by dispensers or advertisements. The counter depth should be increased to provide enough space for a wheelchair to approach comfortably. Tables should have an open design without support bars underneath, allowing full clearance.

33.3. Responsibility of Pedro Maldonado Frappe's LLC - Sabor Frappe: Mrs. Dalia Vázquez recognizes Sabor Frappé in Dorado as a well-known spot for its extensive selection of frappés, offering over 60 flavors and countless customization options that make it a standout among dessert lovers. She has heard excellent reviews about their signature creations, particularly their rich chocolate blends and tropical fruit combinations, which are praised for their freshness and high-quality ingredients. The shop's inviting atmosphere and reputation for consistently great flavors make it an attractive place for her to visit.

33.4. Given its convenient location, she looks forward to experiencing its unique offerings and enjoying a refreshing frappé in June 2025, to try as many frappé flavors as possible, as she is a fan of frappés. However, since December 2024, she has been aware of several architectural barriers that prevent her from accessing the establishment. The barriers that have discouraged her from attempting to visit include the following:

33.4.1. Inaccessible Payment Counter: Mrs. Dalia Vázquez is aware that the payment counter at Sabor Frappé in Dorado is too high and lacks space underneath for a frontal approach. As a quadriplegic using a motorized wheelchair, she is unable to comfortably reach the counter, forcing her to position herself at an angle, which makes transactions difficult. The lack of accessibility at this point of service creates unnecessary barriers that limit her ability to interact independently with staff when placing and receiving orders.

- 33.4.2. Tables with Obstructive Central Supports: Mrs. Vázquez has noticed that the tables in the seating area have a central support with protruding legs. Due to her quadriplegia, Mrs. Vázquez has limited strength and movement in her arms, making it essential for her to position her wheelchair close to the table to reach her meal comfortably. The structure of these tables prevents her from placing her chair in a stable position, forcing her to remain at an awkward distance. This limitation affects her ability to enjoy the seating area as other customers do, restricting her from having a comfortable and practical space to consume her order.
- 33.4.3. Slippery Flooring: Mrs. Vázquez is also aware that the flooring inside the establishment is not slip-resistant, creating an additional challenge when maneuvering her wheelchair. Her motorized chair requires stable traction to move smoothly, and slick surfaces can cause the wheels to slide unexpectedly, making it harder for her to control her movements. This issue adds unnecessary difficulty and discomfort to her experience, making navigation within the establishment more complicated than it should be.
- 33.4.4. To ensure that Mrs. Dalia Vázquez can access Sabor Frappé in Dorado safely and independently, several modifications are necessary. The payment counter should include a lowered section with adequate space for a frontal approach, allowing her to complete transactions comfortably from her motorized wheelchair. The seating area must be updated with accessible tables that have open space underneath, eliminating obstructions that prevent her from positioning herself properly. Additionally, the flooring should be resurfaced with a slip-resistant material to provide better traction for her wheelchair, ensuring stability and ease of movement. Implementing these improvements

would remove the obstacles that currently prevent her from enjoying the establishment, making it a welcoming and accessible space that she would feel encouraged to visit.

33.5. Responsibility of The Yellow Door Coffee & Ice Cream Shop Llc - The Yellow Door Coffee & Ice Cream Shop: Mrs. Dalia Vázquez intends to visit The Yellow Door, Coffee & Ice Cream Shop, a cozy café renowned for its exceptional brunch offerings and friendly staff. The establishment is celebrated for its delicious vegan options, such as the Vegan Just Egg scramble with vegetables and the Monte Cristo sandwich made with vegan pumpkin bread. Patrons have praised the café for its attention to detail and welcoming atmosphere, making it a must-visit spot in Puerto Rico. Given the café's convenient location near her residence, Mrs. Vázquez finds it an ideal place to enjoy quality food and coffee.

33.6. Mrs. Dalia Vázquez intends to visit The Yellow Door, Coffee & Ice Cream Shop, in May 2025 to enjoy one of their upcoming events. She is particularly interested in attending one of their "Coffee Parties". However, since December 2024, she has been aware of several architectural barriers that prevent her from accessing the café safely and independently, discouraging her from visiting as she anticipates unequal access to the amenities and services that other patrons enjoy. These barriers include the following:

33.6.1. Entrance Door with High Handle. Mrs. Dalia Vázquez is aware that the entrance door at The Yellow Door, Coffee & Ice Cream Shop opens outward and is equipped with a handle positioned too high. Given her limited arm mobility, this design makes it difficult for her to reach and operate the door handle, preventing her from entering the establishment independently.

- 33.6.2. Narrow Table Arrangement. Mrs. Vázquez has observed that the indoor tables are placed too close together, creating tight spaces that make it difficult for her to maneuver her motorized wheelchair. Due to her quadriplegia, she requires ample room to navigate safely without the risk of hitting obstacles or struggling to turn. The lack of adequate spacing forces her to take inconvenient routes or avoid certain areas altogether, restricting her ability to move freely within the café.
- 33.6.3. Inaccessible Table Design. Once inside, Mrs. Vázquez is aware that the tables inside the café have central supports with protruding legs and are set at a height that does not accommodate Mrs. Vázquez's motorized wheelchair. Given her limited upper body strength, she must position herself close enough to the table to eat comfortably. However, the current setup prevents her from doing so, making it difficult for her to dine independently and forcing her to remain at an awkward and impractical distance.
- 33.6.4. High Service Counter Obstructed by Seating. Mrs. Vázquez has noted that the service counter is set at a high level and is obstructed by stools, with no designated accessible section. Given her quadriplegia, Mrs. Vázquez relies on her motorized wheelchair for mobility, and the height of the counter, combined with the obstructing stools, makes it difficult for her to approach and interact with the staff. Her limited upper body strength further complicates her ability to reach the counter independently. This arrangement makes it difficult for her to approach the counter, place orders, or interact with the staff, restricting her ability to fully experience the café.
- 33.6.5. Inaccessible Sink. Mrs. Vázquez has observed that the sink in the restroom lacks proper clearance beneath for a frontal wheelchair approach and is

mounted too high, making it difficult for her to use. Due to her quadriplegia, she cannot reach high surfaces or perform actions that require bending or stretching. The high placement of the sink and lack of space beneath it prevent her from using it independently, making it uncomfortable and impractical for her to carry out basic hygiene tasks.

33.6.6. Inaccessible Paper Towel Dispenser. Mrs. Vázquez has noted that the paper towel dispenser is positioned beyond her reach, making it impossible for her to use without assistance. Her limited upper body mobility and lack of strength in her arms hinder her ability to access objects placed too high or far away, thus increasing her reliance on others to complete simple tasks, further diminishing her autonomy.

33.6.7. Manual Toilet Flushing. Mrs. Vázquez has also noted that the toilet in the restroom requires manual flushing with a pull lever, which presents a significant challenge for her. Due to her quadriplegia, she lacks the strength and mobility to engage with manual mechanisms, such as pulling a lever, which is essential for flushing. This limitation makes it impossible for her to operate the toilet independently, adding an extra layer of inconvenience and dependence on others to complete basic restroom tasks.

33.6.8. Lack of Grab Bars. Additionally, Mrs. Vázquez is aware that the restroom lacks grab bars, which are essential for her mobility and safety. Her quadriplegia means she requires support when transferring to and from the toilet, and the absence of grab bars makes these movements hazardous. Without this crucial support, Mrs. Vázquez faces increased risk of injury and a significant reduction in her ability to use the restroom independently and safely.

- 33.6.9. Lack of Accessibility Signage. Mrs. Vázquez has also noted that there is no signage indicating accessibility features in the restroom. For someone with her condition, clear signage is vital to quickly identify which spaces are usable and accessible. The lack of this indication forces her to either guess or seek assistance, adding unnecessary uncertainty and inconvenience to her visit.
- 33.6.10. Step to Outdoor Area without Ramp Access. Mrs. Vázquez has observed that accessing the outdoor seating area requires navigating a step, as there is no ramp available. This design completely prevents her from reaching that section, eliminating the option of outdoor dining.
- 33.6.11. Outdoor Dining Area with Uneven Flooring. Even if she could reach the outdoor area, Mrs. Vázquez is aware that the flooring is in poor condition, with an uneven surface that makes it challenging to maneuver in her motorized wheelchair. The instability of the ground adds further difficulty in navigating the space safely.
- 33.6.12. Closely Spaced Outdoor Tables: Mrs. Vázquez notes that the outdoor tables are positioned very close to one another, limiting the space for her to move freely. This lack of space presents a significant challenge due to her quadriplegia, which limits her ability to maneuver her motorized wheelchair. The reduced room makes it difficult for her to navigate comfortably and find an accessible spot to sit, hindering her independence and freedom of movement.
- 33.6.13. Tables Outdoor with central Support: Mrs. Vázquez also knows that the tables feature central supports with extending legs, which prevent her from positioning her wheelchair comfortably underneath them. Given her condition, she requires enough clearance under the table to dine without obstruction. The

design of these tables makes it impossible for her to access them properly, preventing her from enjoying the outdoor seating options like other patrons.

33.6.14. To ensure that Mrs. Dalia Vázquez can access and enjoy The Yellow Door, Coffee & Ice Cream Shop safely and independently, several modifications are necessary. The entrance door should be equipped with an automatic opener or a more accessible handle positioned within reach for individuals using wheelchairs. The indoor tables should be spaced out adequately to allow for comfortable navigation, and at least one accessible table without a central support should be provided at an appropriate height. The service counter must include a designated accessible section with a lower surface to accommodate wheelchair users, ensuring that Mrs. Vázquez can interact with the staff and place orders without barriers. The restroom requires essential improvements, such as a sink with adequate clearance underneath for frontal wheelchair access, a paper towel dispenser within reachable height, and grab bars installed near the toilet to provide necessary support. A ramp must be installed to eliminate the step leading to the outdoor area, granting Mrs. Vázquez equal access to both dining environments. The outdoor flooring should be leveled and maintained to provide a stable surface for safe mobility. Additionally, outdoor tables must be arranged to allow enough space for movement, with at least one accessible table available. Implementing these changes would make the café a truly welcoming and inclusive space, encouraging Mrs. Vázquez to visit and enjoy its offerings without limitations.

33.7. Moreover, the Municipality of Dorado has failed to enforce accessibility regulations and has allowed the Dorado del Mar Shopping Center to operate without ensuring compliance with accessibility standards. By permitting the center to function without

properly marked accessible parking spaces and allowing conditions that make it difficult for individuals with disabilities to park, access and navigate the premises, the Municipality has directly contributed to Mrs. Dalia Vázquez's exclusion. This lack of enforcement has allowed the shopping center and its businesses to continue operating without making the necessary adjustments to accommodate people with mobility impairments. This failure not only prevents Mrs. Vázquez from accessing the shopping center safely and independently but also reinforces her perception of discrimination, as she is systematically denied equal access to the services and spaces that others can freely enjoy.

Responsibility of the Commonwealth of Puerto Rico; Municipality of Dorado and HSC Dorado LLC - Café Cuatro Sombras

34. Mrs. Dalia has a deep passion for specialty coffee and enjoys visiting coffee shops where she can explore different flavors and aromas. Café Cuatro Sombras is among her favorites, known for its carefully cultivated Puerto Rican coffee. Its balanced flavor, medium body, vibrant acidity, and notes of semi-sweet chocolate, caramel, and spices make it especially appealing to her. She also appreciates the style and atmosphere of the establishment, which enhances the experience even more. However, since December 2024, she has become aware of architectural barriers at the establishment that affect her. This has led her to feel dissuaded from visiting, as these barriers limit her access and impact her comfort within the space. Despite this, Mrs. Dalia wishes to visit Café Cuatro Sombras within the next three months to purchase specialty coffee to take home and also to enjoy a freshly prepared cup at the café. The barriers she knows are:

34.1. Inaccessible Sidewalks: Mrs. Dalia Vázquez is aware that the sidewalks leading to the establishment are heavily worn and deteriorated, creating an additional barrier to safe and independent access. The uneven and cracked surfaces pose a risk of her wheelchair getting stuck or becoming unstable, making movement difficult and

uncomfortable. The lack of proper maintenance has allowed these hazardous conditions to persist, affecting individuals with mobility impairments by creating an unsafe and exclusionary environment.

- 34.1.1. The Commonwealth of Puerto Rico is responsible for the maintenance and accessibility of the sidewalks along PR-693, which are crucial for Mrs. Dalia Vázquez's ability to navigate safely. However, the Commonwealth's continued inaction regarding the poor condition of these sidewalks has resulted in significant barriers for individuals with disabilities. The uneven surfaces, cracks, and other hazards along PR-693 hinder Mrs. Vázquez's mobility, preventing her from accessing the area independently and comfortably. This failure to act reinforces exclusion and discrimination, denying her the right to equal access.
- 34.1.2. On the other hand, the Municipality of Dorado is responsible for maintaining the other sidewalks surrounding the Dorado del Mar Shopping Center. These sidewalks, too, are in poor condition, with cracks, uneven surfaces, and obstacles that impede safe passage for individuals like Mrs. Vázquez. The Municipality's failure to enforce accessibility standards and address these hazards has created an environment where movement is difficult and dangerous. This neglect further limits Mrs. Vázquez's ability to navigate the area independently, reinforcing the barriers that prevent her from accessing public spaces on equal terms.
- 34.2. Cracked Parking Lot with No Marked Accessible Spaces: Mrs. Dalia Vázquez is aware that the parking lot leading to the establishment has multiple cracks and lacks any designated accessible parking spaces. The uneven pavement creates sudden jolts as she moves, making it difficult for her to maneuver safely in her wheelchair. Without

a properly marked accessible space, she is unable to find a designated area that provides enough room to exit her vehicle and deploy her mobility device comfortably. The absence of accessibility features forces her to park in an unsuitable location, adding unnecessary difficulty to her ability to access the establishment.

34.3. Entrance with a Step: Mrs. Dalia is aware that the entrance to the establishment has a step, creating a significant barrier for her due to her reliance on a wheelchair for mobility. The presence of this step prevents her from entering independently, requiring her to seek assistance or find an alternative way to access the premises. This barrier not only limits her physical access but also makes her feel unwelcome, as the establishment does not provide an accessible route that accommodates individuals with mobility impairments. The lack of a step-free entrance discourages her from visiting the location.

34.4. Inaccessible Tables: Mrs. Dalia is aware that the tables in the establishment are not designed to accommodate individuals who use wheelchairs. The design and structure of the tables do not allow for adequate legroom, forcing her into an awkward and uncomfortable position. This prevents her from sitting properly and enjoying the space as other patrons do. The absence of accessible tables limits her ability to dine comfortably and independently, making her feel excluded from the full experience. Knowing this discourages her from visiting the establishment.

34.5. High Counters: Mrs. Dalia is aware that the counters in the establishment are too high, making personal transactions difficult for her. From her wheelchair, her line of sight is obstructed, preventing her from seeing the counter surface or interacting comfortably with staff. The excessive height forces her to strain her arms to reach or speak louder to be heard, making what should be a simple interaction unnecessarily challenging. This lack of accessibility makes her feel dependent on others for tasks she should be

able to complete independently. The inconvenience discourages her from visiting the establishment.

34.6. Inaccessible Restrooms: Mrs. Dalia is aware that the restrooms in the establishment lack the necessary space to accommodate individuals with mobility impairments. The narrow layout and restricted maneuvering space make it difficult for her to enter and use the facilities comfortably. The lack of accessibility forces her into uncomfortable and impractical positions, limiting her independence and making a basic necessity a challenge. Beyond physical barriers, this situation compromises her dignity, as she is unable to use the restrooms without significant difficulty. Knowing this discourages her from visiting the establishment.

34.7. Mrs. Dalia Vázquez is fully aware of the architectural barriers affecting her ability to access Café Cuatro Sombras, such as the deteriorated sidewalks, the cracked parking lot with no designated accessible spaces, and the step at the entrance. These barriers, which hinder her access to the establishment, fall under the responsibility of both the Municipality of Dorado and the Government of Puerto Rico. The sidewalks adjacent to the establishment, which are under the jurisdiction of the Municipality of Dorado, are in a dangerously deteriorated state, with uneven surfaces and cracks that make passage unsafe for individuals with mobility impairments. The lack of proper maintenance has created an exclusionary environment, preventing Mrs. Vázquez from moving safely and independently, thus violating her right to equitable accessibility. Additionally, the absence of accessible parking spaces and the presence of a step at the entrance are further barriers that the establishment should have addressed to ensure safe and independent access. The ongoing inaction by the Municipality of Dorado and the Government of Puerto Rico to improve these conditions has reinforced exclusionary practices, depriving Mrs. Vázquez of equal access to the establishment.

The failure to comply with accessibility standards and remove these barriers discourages Mrs. Vázquez from returning, limiting her right to enjoy the service independently and comfortably.

34.8. The café can address these accessibility barriers by repairing the cracked parking lot and designating properly marked accessible parking spaces with sufficient clearance for maneuverability. Installing a ramp at the entrance would provide step-free access, ensuring that individuals using wheelchairs can enter independently. Rearranging tables to create adequate spacing and incorporating accessible tables with proper knee clearance would allow for a more comfortable dining experience. Lowering a section of the counter or providing an accessible service area would facilitate personal transactions without difficulty. Additionally, modifying the restrooms to expand maneuvering space, widening the doorway, and installing grab bars would ensure accessibility and dignity for individuals with mobility impairments. By implementing these solutions, the café would create an inclusive environment where Mrs. Dalia can visit and enjoy her experience without barriers.

34.9. Moreover, the Municipality of Dorado has failed to enforce accessibility regulations and has allowed Café Cuatro Sombras to operate without ensuring compliance with accessibility standards. By permitting the establishment to function without properly marked accessible parking spaces, allowing conditions that make it difficult for individuals with disabilities to park, access, and navigate the premises, and failing to provide accessible restrooms, the Municipality has directly contributed to Mrs. Dalia Vázquez's exclusion. This lack of enforcement has allowed the café and its surrounding businesses to continue operating without making the necessary adjustments to accommodate people with mobility impairments. This failure not only prevents Mrs. Vázquez from accessing the café safely and independently but also

reinforces her perception of discrimination, as she is systematically denied equal access to the services and spaces that others can freely enjoy.

Responsibility of the Municipality of Dorado and De Holdings LLC - Embassy Suites Hotel Dorado Del Mar Beach Resort and New York Grill And Steakhouse

35. Mrs. Dalia Vázquez intends to visit Embassy Suites by Hilton Dorado del Mar Beach Resort because she is attracted to its location facing the North Atlantic Ocean and the spectacular view it offers. Additionally, she values the hotel's comfort, the friendliness of the staff, and the beauty of its spacious pools. She is also interested in the direct beach access, the variety of restaurants, and the entertainment options within and around the resort. These features make the resort an appealing destination for her, as she seeks an enjoyable and relaxing experience. Since November 2024, Mrs. Dalia Vázquez has known about the architectural barriers at the location, which prevent her from accessing and navigating the premises as she intended. As a result, she feels discouraged from visiting, as these barriers limit her ability to fully enjoy the amenities and services the resort offers. In January and February 2025, Mrs. Dalia Vázquez has wanted to visit the resort because she wishes to enjoy its peaceful atmosphere, relax by the pool, and share pleasant moments at its restaurants. However, due to the architectural barriers she is aware of, she feels discouraged from doing so, as they limit her access to different areas of the hotel. Over the next three months, Mrs. Dalia wants to visit Embassy Suites by Hilton Dorado del Mar Beach Resort because she is looking for a place where she can rest, enjoy the scenery, and take advantage of the hotel's amenities. However, the architectural barriers she knows exist make her feel discouraged, as they affect her mobility and prevent her from enjoying the place. The barriers at Embassy Suites by Hilton Dorado del Mar Beach Resort, which she knows exist, are the following:

35.1. Deteriorated Sidewalks: Mrs. Dalia Vázquez is aware that the sidewalks in front of the hotel at 201 Boulevard Street, Dorado, PR 00646-2344, with coordinates 18.476904291285905, -66.2733185708049 are in poor condition. Since she uses a

wheelchair for mobility, the cracks, uneven surfaces, and broken pavement make it extremely difficult for her to move safely. These obstacles force her to navigate with excessive effort and increase the risk of sudden stops and instability, making movement uncomfortable and exhausting. The poor condition of the sidewalks discourages her from moving around the area. She feels dissuaded from visiting Embassy Suites by Hilton Dorado del Mar Beach Resort.

- 35.1.1. Since this sidewalk is under the jurisdiction of the Municipality of Dorado, it is responsible for its maintenance. However, despite being aware of these deficiencies, the municipality has not taken corrective action. This negligence has rendered the public sidewalk inaccessible and, in turn, has obstructed her ability to navigate the area, exacerbating her sense of exclusion. She feels dissuaded from visiting Embassy Suites by Hilton Dorado del Mar Beach Resort.
- 35.2. Carpets at the Main Entrance: Mrs. Dalia Vázquez encounters difficulty moving over the carpets at the main entrance. Since she uses a wheelchair, the carpets create resistance and make maneuvering more challenging. This makes entering and exiting the hotel uncomfortable and discourages her from frequenting the area. She feels dissuaded from staying at the hotel.
- 35.3. Excessive Height of the Brown Lobby Counter: Mrs. Dalia Vázquez notices that the brown lobby counter is too high for her to use comfortably. Due to her wheelchair height, she cannot reach the counter effectively, making interactions with staff more difficult. This limitation affects her experience in the lobby and discourages her from using the services available there. She feels dissuaded from staying at the hotel.
- 35.4. Limited Depth of the Brown Lobby Counter: Mrs. Dalia Vázquez finds that the brown lobby counter lacks sufficient depth. Because of her wheelchair position, she struggles

to comfortably reach across the counter, making transactions difficult. This makes her interactions at the lobby inconvenient, discouraging her from using the service. She feels dissuaded from visiting Embassy Suites by Hilton Dorado del Mar Beach Resort.

35.5. No Accessible Route to the Internal Kiosk: Mrs. Dalia Vázquez realizes that there is no accessible route to the internal kiosk. The placement of tables further obstructs entry, making it impossible for her to reach the kiosk. This lack of access prevents her from enjoying the space and discourages her from attempting to visit it.

35.6. Table Distribution in the Restaurant: Mrs. Dalia is aware that the arrangement of tables in the restaurant obstructs movement. Due to her quadriplegia and the necessity of using a wheelchair for mobility, she encounters significant difficulties maneuvering through the space. The narrow passages created by the table layout prevent her from navigating comfortably, making it frustrating and exhausting to move around. This barrier discourages her from dining at the restaurant and dissuaded from visiting the hotel.

35.7. Excessive Height of the Buffet Counter: Mrs. Dalia Vázquez experiences difficulty at the buffet due to the high counter. Given her quadriplegia, she has reduced reach and strength, making it impossible to access the food without external assistance. This limitation removes her autonomy and diminishes her dining experience, discouraging her from using the buffet. For that, she feels dissuaded from visiting Embassy Suites by Hilton Dorado del Mar Beach Resort.

35.8. Limited Depth of the Buffet Counter: Mrs. Vázquez notices that the buffet counter is not deep enough. Because of her limited upper body movement due to quadriplegia, she cannot comfortably reach items placed further back. This prevents her from serving herself independently, making the experience frustrating and discouraging her from dining there. She feels dissuaded from staying at the hotel

- 35.9. Lack of Accessible Route in the Pool Area: Mrs. Dalia Vázquez has noticed that there is no accessible path in the pool area. The presence of chairs and plants blocking the way further complicates her ability to move freely. As she relies on her wheelchair, these obstacles force her to take longer and more strenuous detours, making the pool area an inconvenient and unwelcoming space. This situation demotivates her from spending time there and she feels dissuaded from visiting the hotel.
- 35.10. No Accessible Route to the Kiosks Around the Pool: Mrs. Dalia Vázquez is aware that reaching the kiosks around the pool is impossible for her because the only access is through stairs. Since she cannot use stairs, she is completely prevented from visiting these areas. The lack of an alternative path excludes her from enjoying these spaces, making her feel restricted and unmotivated from staying at the hotel.
- 35.11. Excessive Height of the Pool Bar Counter: Mrs. Dalia Vázquez realizes that the pool bar counter is too high for her to reach. Due to her quadriplegia, she has limited upper body mobility, making it impossible for her to access the counter without assistance. This lack of accessibility prevents her from ordering independently, making her feel excluded and discouraged from using the facility, and she feels dissuaded from visiting Embassy Suites by Hilton Dorado del Mar Beach Resort.
- 35.12. No Accessible Route to the Beach: Mrs. Dalia Vázquez is aware that there is no accessible path to the beach. Since she relies on her wheelchair for mobility, this absence of a proper route completely prevents her from reaching the beach. Being unable to enjoy this area makes her feel excluded, discouraging her from visiting the resort.
- 35.13. Carpeted Hotel Rooms: Mrs. Dalia Vázquez finds it challenging to move within the hotel rooms due to the carpeting. Since she uses a wheelchair, the carpet increases

resistance, making movement more strenuous and tiring. This difficulty discourages her from staying in these rooms. For that, she feels dissuaded from staying at the hotel.

35.14. Reduced Space for Circulation in the Rooms: Mrs. Dalia Vázquez knows about the limited circulation space in the rooms. Her wheelchair requires sufficient room to move, but the restricted layout makes navigation difficult. This constraint affects her comfort and discourages her from staying in the hotel.

35.15. The barriers at Embassy Suites Hotel Dorado Del Mar Beach Resort could be eliminated by repairing deteriorated sidewalks to ensure a smooth surface, removing the carpet at the main entrance to reduce resistance, lowering and deepening the brown lobby counter for easier reach, and creating an accessible route to the internal kiosk by rearranging obstructing tables. The restaurant layout must be adjusted to provide wider pathways, and the buffet counter should be lowered and extended to improve access. In the pool area, an accessible path must be established by removing obstructions, and an alternative route to the kiosks should be added to eliminate reliance on stairs. Lowering the pool bar counter can improve usability, while constructing an accessible path to the beach will provide direct access. In hotel rooms, carpets should be eliminated and circulation space must be increased by adjusting furniture placement. These modifications should be implemented to remove physical obstacles and improve accessibility throughout the resort.

36. Mrs. Dalia Vázquez enjoys good food and knows that at New York Grill And Steakhouse, she can enjoy a pleasant, clean, and beautiful environment, with friendly and professional staff. Additionally, she values the excellence of the food and the speed with which it is served. She intends to go and try their perfectly cooked steaks and their delicious truffle mac and cheese, which have been highly recommended for their taste and quality. However, since November 2024, Mrs. Dalia Vázquez has known about the architectural barriers at the establishment that

affect her experience, and for that reason, she feels discouraged from visiting. In January and February 2025, Mrs. Dalia Vázquez has wanted to visit the restaurant because she desires to enjoy a high-quality meal in an elegant and welcoming setting. She looks forward to savoring the flavors of their signature dishes and experiencing the excellent service. However, the architectural barriers she is aware of make her feel discouraged from going, as they negatively impact her overall dining experience. In the next three months, Mrs. Dalia Vázquez wants to visit New York Grill And Steakhouse because she continues to be interested in its renowned cuisine, exceptional service, and inviting ambiance. However, the architectural barriers she knows exist make her feel discouraged, as they prevent her from fully enjoying the restaurant as she wishes. The he architectural barriers she knows are the following:

- 36.1. Black Carpet at the Entrance: Mrs. Dalia Vázquez is aware that the black carpet at the entrance creates a significant barrier to her mobility. Since she uses a wheelchair, the carpet increases resistance, making it difficult for her to move smoothly. The added effort required to push her wheelchair over the surface is physically exhausting and makes entering the restaurant an uncomfortable experience. This obstacle discourages her from visiting New York Grill and Steakhouse.
- 36.2. Excessively Heavy Glass Door: Mrs. Dalia knows about the difficulty with the heavy glass door at the entrance. Due to her quadriplegia, she lacks the strength to push or pull the door effectively, making it impossible for her to enter independently. This lack of accessibility forces her to rely on others for assistance, limiting her autonomy and making her feel unwelcome. This situation discourages her from dining at New York Grill and Steakhouse.
- 36.3. Table Distribution Obstructing Circulation: Mrs. Vázquez has noticed that the arrangement of tables obstructs circulation within the restaurant. As she moves in a wheelchair, the narrow spaces between tables prevent her from navigating

comfortably, forcing her to take longer and more exhausting detours. The lack of sufficient space makes it difficult for her to enjoy the area freely, discouraging her from visiting New York Grill and Steakhouse.

36.4. Excessive Height of the Gray Bar Counter: Mrs. Dalia Vázquez is aware that the gray bar counter is too high for her to reach. Given her quadriplegia, she cannot lift her arms high enough to interact with the counter, making it impossible for her to order or access items independently. This prevents her from fully engaging in the experience, making her feel excluded and discouraged from using the facility. She feels dissuaded from dining at New York Grill and Steakhouse.

36.5. Limited Depth of the Gray Bar Counter: Mrs. Dalia has difficulty using the gray bar counter due to its shallow depth. As she relies on her wheelchair for mobility and has limited upper body movement due to quadriplegia, she cannot reach items placed further back. This design flaw makes it frustrating for her to access the counter comfortably, discouraging her from visiting New York Grill and Steakhouse.

36.6. Tables with Supports Underneath: Mrs. Vázquez realizes that the tables in the restaurant have supports underneath that interfere with her ability to position her wheelchair properly. As she cannot move her legs freely due to quadriplegia, the presence of these structures prevents her from getting close enough to the table, making dining or other activities uncomfortable. This limitation affects her ability to enjoy the space, discouraging her from dining at New York Grill and Steakhouse.

36.7. The barriers at New York Grill and Steakhouse could be eliminated by removing or replacing the black carpet at the entrance with a firm, non-obstructive surface. The glass door must be equipped with an automatic opening mechanism or replaced with a lighter alternative. The tables should be rearranged to provide sufficient space for circulation. The gray bar counter must be lowered to an accessible height, and its

depth should be increased to allow proper reach. The tables with obstructive supports underneath should be replaced with designs that offer unobstructed clearance.

Responsibility of the Municipality of Dorado and Ancarem LLC
Kikita Beach House

37. Mrs. Dalia Vázquez wants to visit Kikita Beach House for its breathtaking ocean view and simply stunning landscape. She has a strong desire to enjoy a sunrise or sunset while listening to the gentle murmur of the waves. She has heard that the food is top-notch, with dishes carefully prepared and full of flavor. The drinks are spectacular, offering a variety that delights the palate and refreshes afternoons by the sea. The service stands out for its excellence, with attentive and friendly staff who make every visit even more special. The menu is diverse and unique, and she is especially interested in trying the grilled octopus and stuffed mushrooms, known for their incredible flavor. Since November 2024, she has known that the place has architectural barriers that directly affect her accessibility due to her quadriplegia and reliance on a wheelchair. Because of this, she feels discouraged from visiting. In December 2024 and February 2025, she has wanted to go to Kikita Beach House to enjoy its renowned hospitality and the beautiful coastal scenery, but because of the architectural barriers she knows the place has and that limit her access, she feels dissuaded from going. Over the next three months, she has the intention of visiting Kikita Beach House because she wants to experience its stunning oceanfront view, enjoy its highly praised cuisine, and spend time in a relaxing environment by the sea. . She is also drawn to the stuffed lobster and filet mignon in puff pastry, that she knows both are described as exquisite. The architectural barriers at Kikita Beach House that she is aware of are the following:

37.1. Sidewalk in Poor Condition: Mrs. Dalia Vázquez is aware of the deteriorated sidewalk in front of Kikita Beach House located at 118 13th Street, Dorado, PR 00646-2447, with coordinates 18.477042417785402, -66.25849016131. The uneven and damaged surface makes it difficult for her to navigate in her motorized wheelchair, causing

discomfort and requiring additional effort to move forward. Since she cannot adjust her posture easily and compensate for sudden jolts, the rough terrain creates an exhausting and frustrating experience. This situation discourages her from visiting Kikita Beach House.

- 37.1.1. Additionally, since the access areas of Kikita Beach House fall under the responsibility of the Municipality of Dorado, the municipality's continued inaction has further contributed to Mrs. Dalia Vázquez's difficulties. By failing to address accessibility issues and allowing structural deficiencies to persist, the Municipality of Dorado has made the pathways leading to the establishment hazardous. This neglect not only created obstacles for her mobility but also reinforced her sense of exclusion, as she was unable to navigate the area safely and access the beach house.
- 37.2. Lack of a Designated Accessible Parking Area: Mrs. Dalia has noticed that there is no designated parking space with proper vertical signage for individuals with disabilities. Without a clearly marked spot, she struggles to find a suitable place to park close to the entrance, forcing her to travel a greater distance on potentially unsafe and uneven surfaces. This inconvenience makes accessing the restaurant unnecessarily difficult and discourages her from visiting the establishment.
- 37.3. No Accessible Route from the Parking Area: Mrs. Dalia Vázquez knows about the difficulties due to the absence of an accessible route from the parking area. The lack of a clear, smooth, and direct path forces her to find alternative ways to reach the entrance, which results in additional strain and discomfort as she maneuvers through obstacles. The challenge of getting from the parking lot to the restaurant adds to her frustration and dissuades her from visiting Kikita Beach House.

- 37.4. No Accessible Entrance – Staircase as the Only Entry Point: Mrs. Dalia Vázquez has encountered the issue that the only way to enter the restaurant is by using stairs. Since she is in a motorized wheelchair, this makes it completely impossible for her to access the establishment independently. The lack of a ramp and an alternative accessible entrance leaves her feeling excluded and unwelcome, making her unmotivated to visit the restaurant.
- 37.5. Black Entrance Mat Creating an Obstacle: Mrs. Dalia Vázquez finds that the black mat placed at the entrance is problematic because its texture and placement interfere with the movement of her wheelchair, causing unnecessary resistance when she tries to enter. Because she cannot easily adjust her chair's position and exert strong manual force, this minor obstacle becomes a frustrating barrier. The inconvenience of dealing with this issue discourages her from visiting Kikita Beach House.
- 37.6. Table Layout Restricting Circulation: Mrs. Dalia Vázquez faces challenges moving through the restaurant due to the arrangement of the tables. The narrow gaps between them limit her ability to maneuver her wheelchair comfortably, forcing her to take longer routes and ask others to move chairs out of the way. Navigating through the space becomes exhausting and inconvenient, making her feel dissuaded from dining at the establishment.
- 37.7. Excessively High Brown Bar Counter: Mrs. Dalia Vázquez has observed that the brown bar counter is too high for her to use comfortably. Since she cannot stand or reach up with sufficient strength, interacting with the counter is nearly impossible. Simple actions, such as placing an order and receiving a drink, require assistance, making her feel dependent and uncomfortable. This limitation discourages her from visiting Kikita Beach House.

- 37.8. Shallow Brown Bar Counter: Mrs. Dalia Vázquez struggles with the lack of depth in the brown bar counter. Because it does not extend far enough, she cannot position her wheelchair close enough to use it effectively. With her limited upper body mobility, reaching across the shallow surface is difficult, making the experience uncomfortable and frustrating. This situation leaves her feeling discouraged from spending time at the establishment.
- 37.9. Balcony Tables That Are Too High: Mrs. Dalia Vázquez notices that the tables on the balcony are too tall for her to use comfortably. Since she cannot elevate herself and adjust her seating position significantly, she is unable to reach the tabletop properly. This makes dining on the balcony an uncomfortable and impractical experience, leaving her feeling unmotivated to visit Kikita Beach House.
- 37.10. The barriers on Kikita Beach House could be eliminated by repairing the damaged sidewalk to create a smooth and even surface, ensuring Mrs. Dalia Vázquez can navigate safely in her wheelchair. A designated accessible parking space with proper vertical signage must be installed near the entrance to provide her with a clear and convenient place to park. A continuous, accessible route from the parking area to the entrance should be established to eliminate unnecessary obstacles. Since the only entry point is a staircase, a ramp or an alternative accessible entrance must be installed to allow her independent access. The black entrance mat should be replaced with a low-profile, slip-resistant mat that does not interfere with wheelchair movement. The layout of the tables inside the restaurant needs to be adjusted, widening the pathways to facilitate her circulation without difficulty. The brown bar counter should be lowered to an appropriate height, and its depth extended to allow her to position her wheelchair comfortably. Finally, the balcony tables must be replaced with ones of standard height so she can use them without limitations. Implementing these solutions

will ensure Mrs. Dalia Vázquez can access and enjoy Kikita Beach House without facing unnecessary difficulties.

Responsibility of the Municipality of Dorado and Los Pachangosos LLC
La Pachanga

38. Mrs. Dalia Vázquez is drawn to visiting La Pachanga because it is a spectacular place with a vibrant atmosphere and excellent cuisine. She knows that the food is delicious and the service is top-quality, making it a great place to enjoy. She is especially interested in trying the tacos and experiencing the famous margaritas, which many consider the best. Additionally, she is attracted to the unique atmosphere of the place, which offers karaoke and entertainment for an authentic Mexican experience. However, since December 2024, she has known that this place has architectural barriers that prevent her from accessing it freely. Due to her quadriplegia and reliance on a wheelchair, these difficulties have discouraged her from visiting. In January and February of 2025, she has wanted to visit the restaurant to enjoy its lively ambiance, taste its well-known dishes, and share a fun experience, but the barriers she knows the place has and that limit her access make her feel dissuaded from going. Over the next three months, she wants to visit La Pachanga because she enjoys Mexican food and wants to try its highly praised tacos, also she wants to experience the vibrant atmosphere with karaoke and entertainment. Nevertheless, the architectural barriers she knows the place has and that restrict her access make her feel discouraged from going. The architectural barriers at La Pachanga that she is aware of are the following:

38.1. Damaged Sidewalks: Mrs. Dalia Vázquez is aware that the sidewalks in front of La Pachanga located at Méndez Vigo Highway KM 5.4, El Ramal, Pueblo Neighborhood, Dorado, PR 00946-0000 are in poor condition. The cracks and uneven surfaces create obstacles that disrupt the smooth movement of her Permobil M300 motorized wheelchair, making navigation uncomfortable and requiring her to constantly adjust to avoid sudden jolts. These irregularities cause strain on her limited

upper-body strength, making the simple act of reaching the entrance an exhausting experience. Because of this, she feels discouraged from visiting the restaurant.

- 38.1.1. Additionally, since the maintenance of the sidewalks in front of La Pachanga restaurant falls under the responsibility of the Municipality of Dorado, the municipality's continued inaction has further contributed to Mrs. Dalia Vázquez's difficulties. By failing to repair the damaged sidewalks and allowing cracks, uneven surfaces, and other hazards to persist, the Municipality of Dorado has made this area unsafe. This neglect not only created obstacles for her mobility but also reinforced her sense of exclusion, as she was unable to navigate the area safely and access the restaurant easily.
- 38.2. Entryway Rug: Dalia Vázquez finds that the rug at the entrance of La Pachanga creates a barrier that interferes with her ability to enter smoothly in her motorized wheelchair. The fabric surface causes resistance, requiring extra effort to push forward and disrupting the steady movement of her chair. This makes accessing the restaurant unnecessarily difficult, discouraging her from visiting the establishment.
- 38.3. Cracked and Uneven Entrance Flooring: Dalia Vázquez knows that the entrance flooring at La Pachanga has cracks and uneven surfaces, making it difficult for her to enter smoothly in her motorized wheelchair. The irregularities create sudden jolts that force her to maneuver carefully, turning a simple entry into an inconvenient and uncomfortable process. This difficulty makes her hesitant to visit the establishment.
- 38.4. Cracked Interior Flooring: Mrs. Dalia Vázquez has noticed that the interior flooring of La Pachanga is damaged, with cracks that interfere with the smooth operation of her motorized wheelchair. These uneven surfaces create small but frequent obstacles that disrupt her movement, making it challenging for her to navigate the restaurant comfortably. Because of this, she feels unmotivated to visit the establishment.

- 38.5. Lack of space: Dalia Vázquez has noticed structural obstacles like columns obstruct the pathways. These barriers force her to take unnecessary detours, complicating her movement and making it difficult to navigate the space efficiently. Given her reliance on a motorized wheelchair, the lack of a clear path increases the effort required to maneuver, turning a simple visit into a frustrating experience. As a result, she feels dissuaded from dining at the restaurant.
- 38.6. Table Layout Restricting Circulation: Mrs. Dalia Vázquez finds that the arrangement of tables inside La Pachanga prevents her from moving freely. The narrow spacing leaves little room for her wheelchair, making it challenging to navigate between tables and find a suitable place to sit. She often has to make multiple attempts to position herself properly, which makes her experience uncomfortable and inconvenient. Due to this difficulty, she feels unmotivated to visit the establishment.
- 38.7. Excessively High Wooden Tables: Mrs. Dalia Vázquez has observed that the wooden tables at La Pachanga are too high for her to use comfortably. Because she relies on her motorized wheelchair, she is unable to adjust her seating height to match the tables, making it difficult to reach her food. This limitation forces her to strain her limited upper-body mobility, turning what should be an enjoyable meal into a struggle. For this reason, she feels discouraged from dining at the restaurant.
- 38.8. Circular Wooden Base on Tables: Mrs. Dalia Vázquez is affected by the circular wooden bases on some tables, which are too wide for her to approach closely in her wheelchair. The large base prevents her from positioning herself comfortably, leaving her at an awkward distance from the table. This makes eating and interacting with others difficult, as she cannot sit naturally within the dining space. Because of this inconvenience, she feels unmotivated to visit La Pachanga.

- 38.9. Tables with a Lower Support Structure: Dalia Vázquez has noticed that some tables in La Pachanga have a lower support structure that interferes with her ability to position her wheelchair properly. The base restricts her leg space, making it impossible to get close enough to the table to dine comfortably. This obstacle forces her to sit at an uncomfortable distance, making her visit an unpleasant experience. As a result, she feels discouraged from going to the restaurant.
- 38.10. Excessively High Bar Counter: Mrs. Dalia Vázquez finds that the bar counter at La Pachanga is too high for her to use. Because she remains seated in her motorized wheelchair, she cannot comfortably reach the surface, making it difficult for her to order and enjoy a drink. The counter's height creates a physical barrier that limits her participation in the social experience of the restaurant. This issue makes her feel excluded and dissuades her from visiting La Pachanga.
- 38.11. Shallow Bar Counter: Dalia Vázquez has observed that the bar counter inside La Pachanga is not deep enough for her to position herself comfortably. The lack of adequate space prevents her from pulling in close, forcing her to remain at an awkward distance. This makes it difficult for her to engage with the bar area and enjoy her visit. Because of this, she feels unmotivated to return to the establishment.
- 38.12. Cement Base at the Bar: Mrs. Dalia Vázquez is aware that the bar counter at La Pachanga has a cement base that blocks her from getting close enough in her wheelchair. The rigid structure prevents her from positioning herself properly, leaving her unable to interact comfortably at the bar. This restriction limits her ability to fully enjoy the experience, making her feel excluded from the space. As a result, she feels discouraged from visiting the restaurant.
- 38.13. The barriers at La Pachanga could be eliminated by repairing and leveling the damaged sidewalks, ensuring a smooth and stable surface for Mrs. Dalia Vázquez to

navigate safely. A clear and unobstructed accessible route must be established by repositioning or removing columns that currently block circulation. The table arrangement should be adjusted to provide ample space for her wheelchair to move freely, and tables with restrictive bases must be replaced with models that allow proper approach. The excessively high wooden tables and bar counter should be modified or replaced with surfaces at an appropriate height to ensure she can dine comfortably. The shallow bar counter must be redesigned to offer sufficient depth, while the cement base beneath the bar should be removed or adjusted to allow her to approach closely. Both the entrance and interior flooring require immediate repairs to eliminate cracks and uneven surfaces that disrupt wheelchair movement. The entryway rug should be removed. These modifications are essential to eliminating the physical barriers that currently prevent Mrs. Vázquez from accessing and enjoying La Pachanga.

Responsibility of the Commonwealth of Puerto Rico; the Municipality of Dorado and Dorado Tierramar Corporation - La Terraza

39. Mrs. Dalia wants to visit the restaurant La Terraza because she is attracted to many of the benefits the place offers, such as live music on Fridays, which creates a welcoming and fun atmosphere, and the cocktail promotions during happy hours on weekdays, which have been recommended to her as a fascinating experience. Additionally, she has heard about the excellent quality of the food, customer service, and the relaxed environment that make the restaurant a special place. Mrs. Dalia plans to visit La Terraza between June and August 2025, as she is eager to enjoy these offerings. However, since November 2024, she has been discouraged from going due to the architectural barriers she knows exist at the establishment. Despite her interest and enthusiasm to visit, these accessibility issues remain a significant obstacle for her, so she has postponed her visit. The barriers are the following:

39.1. Mrs. Dalia Vázquez faces accessibility issues at La Terraza due to illegally parked cars blocking the sidewalk and additional obstacles. This makes it difficult for her to navigate safely in her wheelchair, discouraging her from visiting the restaurant.

39.1.1. Sidewalk Obstruction: Mrs. Dalia Vázquez is aware that the sidewalk in front of the La Terraza restaurant is completely obstructed by illegally parked vehicles, which has significantly reduced the available space for passage. In addition to being narrower due to the parked cars, the sidewalk also presents obstacles like street lamps, further hindering movement. This reduction in the sidewalk's width, combined with these obstacles, makes it extremely difficult for Mrs. Dalia to move safely and independently. Due to her quadriplegia, Mrs. Dalia cannot maneuver between the vehicles or navigate around obstacles like the street lamps, forcing her to stop, ask for help, or look for an alternative route, which interrupts her movement. This obstruction not only limits her access to the restaurant but also increases the risk of becoming trapped in a narrow space, compromising her safety and autonomy as she cannot move along a clear path, discouraging her from visiting the establishment.

39.1.2. Illegal Parking: Mrs. Dalia Vázquez is also aware that the space in front of La Terraza, originally intended to be a sidewalk, has been used as an illegal parking area. In this space, there is even a sign placed by the restaurant indicating that this area is for parking, which further exacerbates the situation. This improper use of pedestrian space creates an additional barrier for Mrs. Dalia, as she cannot move through an area that has been inappropriately occupied, blocking the route that should originally be available for her passage. The motorized wheelchair she uses cannot pass between the parked vehicles, as the space is insufficient, and the cars occupy the entire area,

preventing her from accessing the restaurant independently and safely. Furthermore, since the restaurant has placed the sign, the situation becomes more complex, as the establishment seems to be encouraging this inappropriate use of the sidewalk. This lack of accessibility further discourages her from visiting the place, as she feels she cannot rely on proper and safe access to move freely.

39.1.3. The Commonwealth of Puerto Rico is responsible for ensuring that public spaces, including sidewalks and pedestrian areas along State Highway #693, are accessible to everyone, including people with disabilities or medical conditions that require mobility aids, such as motorized wheelchairs. The presence of architectural barriers, such as illegal parking in front of La Terraza restaurant, highlights the Commonwealth's failure to regulate and enforce proper access to these spaces. The sidewalk, blocked by improperly parked vehicles, significantly reduces the available space for passage, making it dangerous and difficult for Mrs. Dalia Vázquez to move independently. This not only limits her access to the restaurant but also poses a serious safety risk, as she could become trapped in a narrow, blocked path. The Commonwealth must enforce regulations to prevent illegal parking in pedestrian areas, establishing clear and well-marked boundaries for parking spaces and ensuring that parking is prohibited in areas designated for pedestrians. Furthermore, regular inspections and penalties should be implemented to prevent vehicles from occupying these spaces. The presence of a sign placed by the restaurant encouraging the improper use of the sidewalk for parking shows a lack of oversight both by the establishment and the Commonwealth. The Commonwealth must work with businesses to ensure that their signage does

not promote illegal or dangerous practices. By implementing these measures, the Commonwealth would ensure that Mrs. Dalia can move safely and independently in public spaces, preventing her from being discouraged from visiting La Terraza.

- 39.1.4. In addition, the Municipality of Dorado is responsible for maintaining the sidewalks around La Terraza restaurant. These sidewalks are also in poor condition, with cracks, uneven surfaces, and obstacles that hinder safe passage. The Municipality must ensure that these public spaces are properly maintained, eliminating barriers that limit access for people with mobility impairments. This includes repairing damaged sidewalks and removing obstacles like overgrown vegetation or improperly placed objects that reduce the available space for safe movement. The Municipality's failure to address these issues contributes to the exclusion of individuals like Mrs. Vázquez and reinforces the barriers to her independence and mobility in the area.
- 39.2. Inaccessible Parking: Dalia is aware that, in addition to being illegally located on the sidewalk, the parking area does not meet the necessary requirements for accessibility. It is not properly marked or designated for accessible parking spaces, making it difficult for her to access the area safely. The lack of adequate space and clear signage prevents Dalia from parking close to the establishment, limiting her ability to access the place independently. This situation not only violates accessibility regulations but also contributes to her exclusion by failing to provide proper conditions for her movement.
- 39.3. Counter Too High: Mrs. Dalia Vázquez is also aware that the service counter at La Terraza is too high and has chairs that obstruct the passage. Due to her quadriplegia and use of a motorized wheelchair, Mrs. Dalia cannot approach the counter

comfortably to interact or make her purchase. The height of the counter prevents her from reaching or communicating directly with the staff without assistance. Additionally, the chairs positioned around the counter further block her path, making it difficult for her to maneuver freely and access the counter area. This lack of accessibility forces Mrs. Dalia to rely on others for assistance or to avoid this part of the restaurant entirely, limiting her autonomy and the ease with which she can enjoy the services provided, discouraging her from visiting the establishment.

39.4. Inaccessible Chairs: Inside the restaurant, Mrs. Dalia Vázquez is aware that the chairs on the first floor are not designed for her to sit comfortably, as they are fixed-base furniture and do not allow for direct front access. This makes it impossible for Mrs. Dalia, who uses a motorized wheelchair, to approach the chairs properly and sit down independently. Additionally, the chairs at the counter are too high, which also prevents her from using them accessibly, as she cannot reach or settle into them correctly. On the second floor, all the chairs in the central area of the dining space are equally too high, preventing Mrs. Dalia from getting close to the tables properly. The lack of accessible seating in various areas of the restaurant forces Mrs. Dalia to depend on the help of others to sit down or, in some cases, to completely avoid these areas, limiting her enjoyment of the place and her autonomy within the establishment, which discourages her from visiting.

39.5. Tables Preventing Front Access: Mrs. Dalia Vázquez is aware that the tables on both the first floor and the rooftop of La Terraza are designed with bases that obstruct front access, making it impossible for her to approach them with her motorized wheelchair. The need to access tables from the front is crucial for her, as she does not have enough mobility or strength in her arms to maneuver in other ways. Due to these table bases, Mrs. Dalia cannot position herself properly, affecting her ability to enjoy a meal or

drink at the restaurant without assistance, limiting her independence and comfort, and discouraging her from visiting.

- 39.6. Access to the Second Floor Only by Stairs: Similarly, she is aware that the second floor of La Terraza is only accessible by stairs, as the establishment lacks an elevator or ramps. This is a significant barrier for Mrs. Dalia, who, due to her quadriplegia and use of a motorized wheelchair, cannot climb stairs. The absence of an accessible alternative prevents her from enjoying the full space of the restaurant, restricting her experience to the first floor and limiting her access to areas that might interest her, such as the rooftop or any part of the second level.
- 39.7. Areas with Raised Edges Without Ramps: She also knows that there are areas throughout the restaurant with raised edges that do not have ramps for access. Since Mrs. Dalia moves in a motorized wheelchair, these raised edges represent a significant barrier, preventing her from moving freely around the establishment. The areas without ramps force Mrs. Dalia to depend on the help of others to overcome these obstacles, which affects her autonomy and comfort inside the restaurant, limiting her ability to explore and enjoy the place independently, which discourages her from visiting.
- 39.8. To address the barriers faced by Mrs. Dalia Vázquez, both La Terraza restaurant must take action. The restaurant should install a service counter at an accessible height and ensure that there are no chairs or obstacles blocking the path, allowing Mrs. Dalia to approach and interact independently. Additionally, all seating areas should be equipped with chairs that allow access and avoid high tables and chairs that limit access for those using motorized wheelchairs. The restaurant must also ensure that the second floor is accessible, either by installing a ramp or an elevator, so Mrs. Dalia can enjoy all areas of the establishment. Furthermore, raised edges without ramps should

be removed to ensure smooth mobility throughout the venue. Additionally, the restaurant should ensure proper parking allocation and promote a culture of prohibiting illegal parking. By addressing these issues, the restaurant can create a more accessible and welcoming environment for Mrs. Dalia.

39.9. The Municipality of Dorado has failed to fulfill its responsibility to ensure proper access to public establishments, allowing La Terraza restaurant to operate without the necessary conditions to facilitate entry for people with reduced mobility, such as Mrs. Dalia Vázquez. By granting use permits to a business that does not provide an accessible entry route and allowing obstructions that block passage, the Municipality is contributing to the exclusion of people with disabilities. This failure to enforce accessibility standards not only limits Mrs. Dalia's physical access but also reinforces her sense of discrimination by making her feel that she cannot enjoy the same services as other customers due to her condition. The Municipality's lack of action exacerbates this situation, as it does not ensure that the restaurant provides an inclusive and safe environment for everyone.

39.10. If these solutions are implemented, Mrs. Dalia Vázquez would be able to visit La Terraza restaurant independently and safely. Thanks to the removal of architectural barriers and improvements in accessibility, she would be able to easily access the establishment, navigate a clear path on the sidewalks, approach tables and chairs without difficulty, and have full access to all areas of the restaurant, including the second floor. Additionally, with a more accessible environment, she could enjoy the benefits the restaurant offers, such as cocktail promotions during happy hour and live music on a Friday between June and August 2025. The ability to enjoy these benefits without constantly relying on others would make Mrs. Dalia feels more comfortable and autonomous, motivating her to visit the place and enjoy the experience.

Responsibility of the Commonwealth of Puerto Rico; the Municipality of Dorado and Lula' S Burger Corporación - Lula's Burger

40. Lula's Burger is a place known for its wide variety of mojito flavors and delicious food, making it an appealing destination for many people, including Mrs. Dalia Vázquez. The combination of unique flavors in their cocktails and their outstanding food offerings is something Mrs. Dalia has been eager to experience. She intends to visit the restaurant in May 2025 to enjoy the experience of trying their dishes and drinks. However, she remembers that since January 2025, she has been discouraged from visiting the restaurant due to the multiple architectural barriers she knows exist at the location. Despite being drawn to the restaurant's offerings, the accessibility challenges prevent her from enjoying the experience independently and safely, which has led her to refrain from visiting it so far. These are the barriers:

40.1. Restricted Accessibility on the Sidewalk: Mrs. Dalia Vázquez is aware that the entrance to Lula's Burger from the street does not have a properly structured sidewalk. The sidewalk is mostly made up of dirt and grass, making the path uneven and dangerous, especially for someone who uses a motorized wheelchair like Mrs. Dalia. Additionally, this area is obstructed by illegal parking, which not only further reduces the available space to pass through but also presents an additional risk, as Mrs. Dalia cannot pass between the parked vehicles or maneuver safely. The lack of a properly delimited sidewalk and the presence of vehicles in a space meant for pedestrian traffic force her to stop, seek help to cross, or even consider alternative routes, which interrupts her mobility, limits her autonomy, and discourages her from visiting the establishment.

40.1.1. The Commonwealth of Puerto Rico is responsible for ensuring that public spaces, including sidewalks along State Highway #693, are accessible for Mrs. Dalia Vázquez. The presence of this architectural barrier at the entrance of Lula's Burger, where the sidewalk is poorly structured and obstructed by

illegally parked vehicles, reflects a failure on the part of the Commonwealth to fulfill this responsibility. The lack of action to regulate and control parking in pedestrian areas, as well as the inadequate maintenance of sidewalks, severely limits Mrs. Dalia's mobility. The Commonwealth must implement urgent measures, such as the installation of properly paved sidewalks, clear delineation of pedestrian areas, and constant supervision to prevent illegal parking in these spaces. Additionally, it must foster a culture of respect for accessibility standards, working in collaboration with local businesses to ensure there are no physical barriers preventing safe and independent access to their establishments. If the Commonwealth took these actions, Mrs. Dalia would be able to move safely and without restrictions, which would facilitate her visit to Lula's Burger.

- 40.1.2. In addition, the Municipality of Dorado is responsible for the sidewalks surrounding Lula's Burger. These sidewalks are in poor condition, with cracks, uneven surfaces, and obstacles that obstruct safe passage for Mrs. Dalia. The Municipality must ensure that these sidewalks are properly maintained, removing any hazards and providing sufficient space for safe navigation. By addressing these issues, the Municipality would allow Mrs. Dalia and others with mobility impairments to access the area independently and safely, reinforcing the importance of maintaining accessible infrastructure within its jurisdiction.
- 40.2. Parking Spaces: Mrs. Dalia Vázquez is aware that the accessible parking spaces within the establishment do not meet the accessibility requirements set by the ADA. Although there are spaces designated as accessible, they do not have the proper signage with the international disability symbol at the correct height, and the route to

the accessible entrance is not clearly indicated. This creates confusion and difficulty for Mrs. Dalia when trying to park near an appropriate entrance, affecting her ability to access the restaurant independently and safely, and discourages her from visiting the place.

- 40.3. Inaccessible Entrance: Mrs. Dalia Vázquez is further dissuaded from visiting because the entrance to Lula's Burger, which is supposed to be accessible, is actually not functional for her needs. Although there are ramps, the route to the entrance is not properly signposted, and the entrance itself is too narrow. Due to her quadriplegia and use of a motorized wheelchair, Mrs. Dalia finds it difficult to identify the accessible route and maneuver through the narrow entrance, preventing her from accessing the restaurant independently. The lack of signage and the limited space make it extremely difficult for her to navigate the entrance, severely hindering her autonomy when trying to enter the establishment.
- 40.4. Too High and Obstructed Counter: Inside the restaurant, Mrs. Dalia is aware that the service counter is too high, which poses a significant barrier for her, as her quadriplegia prevents her from elevating herself or reaching such a height. Since she cannot access the counter directly, Mrs. Dalia is forced to rely on the help of others to interact with the staff or place her order, affecting her autonomy and the experience she could have enjoyed at the restaurant. Additionally, the counter has little depth, further complicating her ability to get close enough to use it independently. To make matters worse, the high chairs that obstruct access to the counter prevent Mrs. Dalia from approaching or maneuvering properly with her motorized wheelchair. This not only interrupts her mobility but forces her to depend entirely on others to access this space, limiting her comfort and autonomy. All of this creates an uncomfortable and

discouraging experience, which makes her hesitant to visit the establishment as she feels she will not be able to enjoy the service independently and comfortably.

40.5. Inaccessible Tables: Mrs. Dalia is also aware that the tables inside the restaurant have bases with designs that block front access. Since she uses a motorized wheelchair, Mrs. Dalia needs direct access from the front, but the table designs block this possibility, making it impossible for her to sit independently and enjoy her meal without assistance. This limits her enjoyment of the place and makes it difficult for her to interact comfortably within the restaurant, ultimately discouraging her from visiting.

40.6. Restrooms: Mrs. Dalia Vázquez is aware that the bathroom door at Lula's Burger is very narrow, which presents an immediate barrier for her when trying to access it. Since she uses a motorized wheelchair, Mrs. Dalia needs ample space to maneuver and enter the bathroom easily. However, the lack of sufficient space between bathroom elements, such as the toilet and the walls, makes it almost impossible for her to access the bathroom independently. According to accessibility standards, bathrooms should be designed to allow unobstructed access and include additional space for maneuvers, such as an area next to the toilet and wide doors. The absence of these basic elements not only compromises Mrs. Dalia's comfort and safety but also limits her independence within the restaurant. This barrier affects her overall experience, as she cannot use the facilities comfortably or without help, discouraging her from visiting the place or enjoying her stay fully.

40.7. To address the barriers faced by Mrs. Dalia Vázquez, Lula's Burger can implement several key solutions. First, they must ensure that the accessible parking spaces comply with ADA requirements by placing the international disability symbol clearly visible at a height between 5 and 7 feet from the ground. The sign should be

positioned where it is clearly visible to drivers, ideally at eye level. These signs should be accompanied by clear and accessible routes to the entrance of the establishment. Additionally, the accessible entrance should be wider, properly marked with visible arrows, and free of obstructions, allowing Mrs. Dalia to access the restaurant independently. The counter should be redesigned to an appropriate height with greater depth to allow her to approach and use it without obstacles, while the high chairs should be replaced with more accessible options that leave enough space for approaching the counter. The tables should also have open bases to allow frontal access, making it easier for Mrs. Dalia to sit down without assistance. Finally, the restrooms should be redesigned with wider doors, adequate space for maneuvering, and elements such as support bars, ensuring that Mrs. Dalia can use them independently. With these changes, the restaurant would not only comply with accessibility standards but also provide an inclusive environment that allows Mrs. Dalia to enjoy the experience without barriers.

- 40.8. The Municipality of Dorado has neglected its obligation to ensure proper access to public establishments, such as Lula's Burger, for individuals with reduced mobility, like Mrs. Dalia Vázquez. By allowing the establishment to operate without providing proper access routes, such as obstacle-free entrances, the Municipality is enabling the exclusion of people with disabilities. This failure to enforce accessibility standards not only restricts Mrs. Dalia's access but also creates a sense of inequality and discrimination, as it prevents her from enjoying the same opportunities as other customers. The Municipality's lack of action in regulating and monitoring these essential aspects contributes to Lula's Burger not providing a fully accessible and inclusive environment for all.

40.9. If all the identified barriers are properly addressed, Mrs. Dalia Vázquez would enthusiastically visit Lula's Burger. The removal of access obstacles, the redesign of the counter, the improvement of the bathroom layout, and the adaptation of accessible parking spaces would not only ensure her safety and comfort but also provide her with the autonomy she needs to enjoy the experience at the restaurant, finally trying the variety of mojito flavors that Lula's Burger offers. These improvements would allow her to enjoy the place with more freedom and without physical barriers, motivating her to choose Lula's Burger regularly.

Responsibility of the Municipality of Dorado and Melolaika Burguer LLC
Melolaika Burguer

41. Melolaika Burguer is a restaurant known for its exquisite culinary offerings, with one of its most special dishes being the buttered snapper fillet accompanied by mofongo. This dish is an absolute delight, with the snapper perfectly seasoned and cooked to perfection, accompanied by a smooth and flavorful mofongo, making each bite a unique experience. Mrs. Dalia Vázquez, a great lover of fine food, is eager to visit and try this dish in 4 months, knowing that the combination of flavors is irresistible. This is despite the fact that since December 2024, she has been discouraged from doing so due to the following architectural barriers present at the restaurant:

41.1. Parking: Mrs. Dalia Vázquez is aware that at Melolaika Burguer, the designated parking area is poorly located, as it is right in front of the restaurant with no clearly defined space, causing many cars to park directly in front of the entrance. This situation makes it difficult for her to find a proper spot to maneuver close to the entrance. Additionally, this parking area lacks the required legal features, such as clearly marked spaces, accessible spots, and accessible pathways for people with disabilities, as well as proper signage. Because Mrs. Dalia uses a motorized

wheelchair, the absence of accessible parking forces her to rely on the help of others to get to the restaurant, limiting her independence and comfort. This makes her feel uncomfortable and discourages her from visiting the establishment.

41.2. Inadequate Service Counter: Mrs. Dalia Vázquez is aware that at Melolaika Burguer, the service counter is too high and lacks the necessary depth to allow her to approach it directly with her motorized wheelchair. Due to her condition, Mrs. Dalia needs to be at the counter's height to interact independently, but the current design prevents her from doing so. This barrier forces her to rely on others to place her order, limiting her comfort and independence.

41.3. Tables with Bases that Block Access: Mrs. Dalia Vázquez is aware that at Melolaika Burguer, especially in the main area, the tables have bases that block front access. Since she uses a motorized wheelchair, she needs an unobstructed space to approach and sit comfortably. However, the bases of the tables prevent her from accessing them directly, forcing her to depend on others for assistance to sit down. In the game area, the tables and chairs are too high and also do not allow for front access, forcing her to make dangerous maneuvers in an attempt to reach them. This barrier limits her independence and makes her feel uncomfortable, reducing her enjoyment of the restaurant and discouraging her from wanting to visit.

41.4. To address the accessibility barriers at Melolaika Burguer, specific solutions must be implemented to ensure the comfort and independence of Mrs. Dalia Vázquez. First, the parking area should be redesigned, placing accessible spaces close to the entrance and ensuring they are properly marked, with at least 96 inches of width and clear paths to facilitate access. For the service counter, it needs to be lowered to an accessible height between 28 and 34 inches and ensure it has enough depth for her to approach without obstacles. Additionally, the table design must be modified, especially in the

main area and near the game machines, by eliminating the bases that block front access and leaving enough space underneath for her to approach and sit comfortably. It is also necessary to ensure that the tables and chairs in these areas have an adequate height, with a minimum of 28 inches from the floor to the bottom edge of the table, to facilitate access and prevent Mrs. Dalia from relying on assistance. These modifications would significantly improve Mrs. Dalia's experience at the restaurant, allowing her to enjoy the food and atmosphere independently and comfortably.

41.5. The municipality of Dorado has a key responsibility in ensuring that businesses like Melolaika Burguer meet the accessibility needs of individuals with mobility challenges. As part of its duties, the municipality must ensure that public spaces and establishments comply with accessibility standards, such as providing ramps, accessible parking spaces, and ensuring that paths and areas inside the business are clear of obstacles. This responsibility also includes regular inspections to verify that businesses have implemented the necessary changes to facilitate the access of people with disabilities. Furthermore, the municipality can provide guidance to business owners on how to improve accessibility and ensure that they are complying with all relevant regulations. By taking proactive measures, the municipality of Dorado plays an essential role in removing barriers, allowing people like Mrs. Dalia to enjoy their community's services comfortably and independently.

41.6. Once the accessibility barriers at Melolaika Burguer are addressed, Mrs. Dalia will be excited to visit the restaurant. She has long been eager to try the delicious dishes, particularly the signature fried chicken and mofongo, but has been discouraged from doing so due to the current challenges she faces in accessing the establishment. When these barriers are removed, she will be able to visit independently and enjoy the restaurant's offerings without feeling limited by her mobility needs.

Responsibility of the Commonwealth of Puerto Rico; the Municipality of Dorado and El Caballin Dorado Corp. - Pirilo Pizza Rústica

42. Pirilo Pizza Rústica in Dorado is a truly special place. This restaurant stands out not only for its excellent pizza but also for its cozy and authentic atmosphere that transports you to a unique dining experience. The food is delicious, and among its standout dishes, the Pizza La Pampa is undoubtedly one of the gems on the menu. With a perfect blend of fresh ingredients, a crispy crust, and a combination of flavors that make it irresistible, it's easy to see why many consider it one of the best places to enjoy pizza. What makes Pirilo Pizza Rústica even more special is its attention to detail and the passion they put into every dish. It's not just another pizzeria; it's a place that invites you to enjoy a complete culinary experience, ideal for going with friends, family, or even for a romantic dinner. Every bite of their pizzas reflects the quality and dedication they put into their cooking. That's why Mrs. Dalia is eager to visit in two months and enjoy this delicious pizza. However, despite her enthusiasm, she knows that she has been discouraged from doing so since November 2024. The reason for her hesitation is the following barriers that the location presents:

42.1. Deteriorated Sidewalk: Mrs. Dalia Vázquez is aware of the barrier posed by the sidewalk in front of Pirilo Pizza Rústica, which has potholes, cracks, and obstacles like posts. This barrier affects Mrs. Dalia, as her motorized wheelchair is constantly obstructed by these terrain defects, making it difficult for her to move safely and comfortably. The potholes and cracks prevent smooth movement, while the posts present an obstacle that needs to be avoided. Due to her quadriplegia, with limited mobility in her left arm and no sensation below the chest, Mrs. Dalia depends on the wheelchair to move, and these obstacles directly interfere with her ability to access the restaurant. Because of this, she is dissuaded from visiting, as smooth and unobstructed circulation is essential for her comfort and safety.

- 42.1.1. The Commonwealth of Puerto Rico has allowed the sidewalk in front of Pirilo Pizza Rústica along State Highway #693 to remain in poor condition, with potholes, cracks, and obstacles like posts, presenting a significant barrier for Mrs. Dalia Vázquez, who relies on a motorized wheelchair to get around. The lack of proper maintenance and the failure to take corrective action make it difficult for her to move safely and comfortably, discouraging her from visiting the restaurant. The Commonwealth has the responsibility to ensure accessibility in public spaces and should take immediate steps to repair the potholes and cracks, remove obstacles like the posts, and ensure regular sidewalk maintenance. Additionally, continuous supervision and penalties should be implemented to prevent these barriers from persisting, ensuring an accessible and safe environment for all, especially for those with reduced mobility.
- 42.1.2. Furthermore, the Municipality of Dorado is responsible for maintaining the sidewalks around Pirilo Pizza Rústica. These sidewalks are in poor condition, with uneven surfaces and obstacles that hinder safe passage. The Municipality must address these issues by repairing the sidewalk, removing any obstacles, and ensuring that these areas are accessible to everyone, including individuals with mobility impairments. By fulfilling its responsibilities, the Municipality would contribute to a safer and more inclusive environment for all residents and visitors.
- 42.2. Inadequate Parking: Mrs. Dalia Vázquez is aware that the parking is inaccessible. The space is not properly marked, which means there are no clearly designated accessible paths or routes for wheelchair users. This affects Mrs. Dalia because, due to her quadriplegia, she depends on a motorized wheelchair to move, and without proper

parking spaces, there is no accessible place for her to park safely. This makes access to the restaurant even more complicated and limits her ability to enjoy the dining experience. Because of the lack of accessibility in the parking lot, she is dissuaded from visiting, as the difficulty of parking properly is a significant obstacle.

- 42.3. Inaccessible Restrooms: Mrs. Dalia Vázquez is aware that the restrooms at Pirilo Pizza Rústica are not accessible. The doors are too narrow, there is a step to enter without a slope, and there is not enough space to maneuver inside. This is a major issue for Mrs. Dalia, as due to her quadriplegia, she needs unobstructed access to use the restroom. The limited space and lack of proper entry make it difficult for her to move inside the bathroom, preventing her from using the facilities independently and safely, which is essential for her well-being. For this reason, Mrs. Dalia is dissuaded from visiting Pirilo Pizza Rústica, as she does not feel safe or comfortable with the bathroom facilities.
- 42.4. Narrow Entrance: Mrs. Dalia Vázquez is aware that the entrance to the establishment is too narrow. This barrier directly impacts her ability to enter the restaurant with her motorized wheelchair. Due to the lack of space, Mrs. Dalia cannot comfortably pass through the entrance without being unable to maneuver, making it difficult for her to enter the restaurant and enjoy the experience without external assistance, which represents a significant limitation due to her reduced mobility. The lack of adequate space for wheelchair access dissuades her from visiting, as she would have to rely on assistance to get in, which affects her independence and comfort.
- 42.5. Narrow Hallways: Inside the restaurant, Mrs. Dalia Vázquez is aware that the hallways between sections are too narrow for her motorized wheelchair to maneuver easily. This barrier affects her as, with her limited mobility, she needs enough space to move around the place without difficulty. The narrow hallways prevent her from

moving safely and comfortably between different areas of the restaurant, limiting her ability to access various sections and enjoy the experience without obstacles. Because of this, she decides not to visit the place.

- 42.6. High Service Counter: Mrs. Dalia Vázquez is aware that the service counter is too high and lacks sufficient depth for a person in a motorized wheelchair to approach and be served comfortably. Due to her quadriplegia and limited mobility, Mrs. Dalia cannot reach the counter from her chair, which makes it difficult for her to place an order or interact with the staff independently. This barrier creates an uncomfortable situation and limits her access to the restaurant's services autonomously. Because of this, she is dissuaded from visiting the restaurant, as she feels uncomfortable and limited in her ability to carry out actions independently.
- 42.7. Inaccessible Tables: Mrs. Dalia Vázquez is aware that the tables in all sections of the restaurant have bases that do not allow for frontal access and therefore lack space for the knees and feet of people using motorized wheelchairs. This barrier affects Mrs. Dalia, as when trying to sit at one of these tables, she does not have enough space to place her chair comfortably. This prevents her from enjoying her meal in a proper position, forcing her to look for a more accessible spot or depend on additional help to adjust her seating, which disrupts her experience and enjoyment of the meal. Because of this, Mrs. Dalia is dissuaded from visiting Pirilo Pizza Rústica, as she knows she will not be able to sit properly without depending on assistance.
- 42.8. To improve accessibility at Pirilo Pizza Rústica and allow Mrs. Dalia to enjoy her visit, several solutions could be implemented. First, the parking lot should be reconfigured to meet ADA guidelines, with designated accessible spaces and properly marked routes to ensure Mrs. Dalia can park without complications. Regarding the restrooms, it is essential to widen the doors, eliminate the step, and provide enough

space inside for Mrs. Dalia to maneuver easily and without obstacles. The entrance to the establishment should be widened to allow her comfortable access without the need for assistance. The hallways inside the restaurant must be expanded to ensure Mrs. Dalia can move between different sections without difficulty. The service counter should be adjusted to an accessible height and greater depth, allowing her to approach and be served comfortably. Finally, the tables should be modified to provide Mrs. Dalia with adequate access, with enough space underneath for her knees and feet, ensuring she can enjoy her meal without inconvenience.

42.9. The Municipality of Dorado has failed in its duty to ensure that public establishments, such as Pirilo Pizza Rústica, are accessible to individuals with reduced mobility, like Mrs. Dalia Vázquez. By allowing the restaurant to operate without proper access and failing to remove obstacles that impede entry, the Municipality is fostering the exclusion of people with disabilities. This failure to comply with accessibility regulations not only limits Mrs. Dalia's ability to access the establishment, but also intensifies her sense of discrimination, as she is denied the opportunity to enjoy the same services as other customers due to her mobility limitations. The Municipality's lack of intervention worsens the situation, as it does not ensure that Pirilo Pizza Rústica provides an inclusive and safe environment for all visitors.

42.10. Once these barriers are resolved, Mrs. Dalia will visit Pirilo Pizza Rústica and enjoy a complete and accessible experience. The necessary modifications in the restaurant will allow her to move easily within the space, interact with the staff, and sit comfortably at the tables, enhancing her overall experience. By addressing these barriers, Pirilo Pizza Rústica will become a place where Mrs. Dalia can fully enjoy her visit, which otherwise wouldn't be possible due to the current difficulties.

Responsibility of the Municipality of Dorado and Karasu LLC
Punto Plena Bakery

43. Ms. Dalia Vázquez is very interested in visiting Punto Plena, as she has heard wonderful recommendations about its food, especially the Las Mattadoras alcapurrias, which are highly praised for their unique flavor and large size. She loves being able to enjoy this delicious dish in a cozy atmosphere, and the idea of trying something so highly regarded by others excites her. She plans to visit the restaurant in the next four months, as she is eager to experience the food firsthand. However, since January 2025, she has been discouraged from doing so. Despite her desire to enjoy a dining experience at this restaurant, she has been unable to make her visit due to access-related difficulties, preventing her from enjoying the place as she likes:

43.1. Obstructed Sidewalk: Mrs. Dalia Vázquez is aware of the barrier represented by the sidewalk in front of Punto Plena, which is obstructed by tents, tables, chairs from the establishment, palm trees, and monuments. This barrier affects Mrs. Dalia because, due to her quadriplegia and dependence on a motorized wheelchair, she is unable to move easily along the sidewalk. The obstacles impede her mobility, blocking her path and forcing her to find an alternative route, disrupting her access to the restaurant and discouraging her from visiting it.

43.1.1. The Municipality of Dorado is responsible for ensuring that public spaces, including sidewalks, are accessible to all residents and visitors, including people with disabilities like Mrs. Dalia Vázquez. The obstruction of the sidewalk in front of Punto Plena, caused by tents, tables, chairs, palm trees, and monuments, highlights the municipality's failure to enforce pedestrian access regulations. This lack of oversight and action creates significant mobility challenges for people who rely on wheelchairs, such as Mrs. Dalia. To resolve this issue, the municipality must take immediate action by establishing clear guidelines for businesses regarding the maintenance of clear and accessible pathways. This could include implementing restrictions on the

placement of tables, chairs, or other objects that block the sidewalk and ensuring that the sidewalks are wide enough to accommodate wheelchairs. Additionally, regular inspections should be conducted, and penalties should be applied to establishments that do not meet accessibility standards. By addressing these concerns, the municipality would improve public access, ensuring that Mrs. Dalia can move around the area safely and comfortably, which would encourage her to visit local businesses like Punto Plena.

- 43.2. High and Blocked Service Counter: Mrs. Dalia Vázquez is aware that the service counter at Punto Plena is too high and lacks the necessary depth for her to approach comfortably with her motorized wheelchair. Additionally, it is obstructed by chairs, preventing Mrs. Dalia from interacting autonomously and comfortably. This affects her ability to place an order or interact with staff without external assistance, making it difficult for her to enjoy the experience at the restaurant independently and comfortably.
- 43.3. Inaccessible Tables: Mrs. Dalia Vázquez is aware that the tables at Punto Plena do not have enough depth to allow for the front access of her motorized wheelchair. This barrier prevents her from sitting comfortably at a table, as she does not have enough space to position her wheelchair properly and enjoy her meal. The lack of accessibility in the tables limits Mrs. Dalia's ability to fully enjoy the dining experience without relying on assistance to adjust, which causes her discomfort and discourages her from visiting the restaurant.
- 43.4. To improve accessibility at Punto Plena, specific solutions need to be implemented to facilitate Mrs. Dalia's access. The service counter should be adjusted to an accessible height and have the necessary depth for Mrs. Dalia to approach comfortably with her motorized wheelchair, without any obstruction preventing her from interacting

independently. Finally, the tables should be modified to provide enough space underneath, allowing for the front access of her wheelchair and ensuring she can sit comfortably to enjoy her meal. These modifications would enable Mrs. Dalia to access the restaurant safely, comfortably, and independently.

43.5. Mrs. Dalia Vázquez will visit Punto Plena as soon as the accessibility barriers are resolved. She is very excited to try the alcapurrias Las Mattadoras, which come highly recommended for their unique flavor and generous size. The idea of enjoying a delicious meal in a cozy and well-regarded environment motivates her greatly. Additionally, the opportunity to experience an independent dining outing, free of obstacles, is something she deeply values. Once the access issues are resolved, Mrs. Dalia will finally be able to enjoy everything Punto Plena has to offer, without barriers interfering with her experience.

Responsibility of the Municipality of Dorado and Katrina, Inc.
Katrina

44. Mrs. Dalia Vázquez is very interested in visiting the Katrina restaurant because it is located very close to the beautiful Balneario de Dorado beach, a place she loves for its relaxed atmosphere and proximity to the sea. Additionally, Katrina is well known for its exquisite seafood dishes, especially its Paella and Seafood Mofongo, which she has heard are delicious and highly recommended. The idea of enjoying fresh seafood while being near the beach is very appealing to Mrs. Dalia. She plans to visit the restaurant in three months, eager to experience the food and atmosphere firsthand. However, since December 2024, she has been dissuaded from visiting the place due to the architectural barriers she knows are present at the establishment. In addition to discouraging her from visiting, knowing about these barriers has made her feel frustrated and anxious, as she fears that her visit will be hindered by accessibility issues. Although she eagerly wants to enjoy the dining experience that Katrina

offers, the accessibility issues have led her to postpone her visit, as she does not want to face obstacles that make her mobility and comfort difficult. The barriers are as follows:

44.1. Sidewalk: Mrs. Dalia Vázquez faces difficulties with the sidewalk in front of Katrina due to the numerous obstacles obstructing her path, such as posts, palm trees, trees, signs, and tables from the restaurant. Additionally, the ramp has cracks and lacks curbs, making it difficult for her motorized wheelchair to move safely and smoothly. Due to her quadriplegia, which prevents her from moving her body from the waist down, and her complete dependence on the wheelchair, these obstacles severely hinder her mobility, forcing her to search for alternative routes that are not always available, disrupting her access to the restaurant and making her feel insecure.

44.1.1. The responsibility of ensuring accessibility on the sidewalk in front of the Katrina restaurant lies directly with the Municipality of Dorado, which has not taken the necessary measures to regulate and maintain this area properly. The presence of obstacles such as posts, trees, palms, and tables from the restaurant prevents Mrs. Dalia Vázquez from moving safely and comfortably, causing her to avoid visiting the establishment. Additionally, the access ramp is in poor condition, with cracks and a lack of curbs, further complicating the situation and making it extremely difficult for Mrs. Dalia to navigate. The municipality has not effectively intervened to address these deficiencies, allowing the sidewalks and access points to remain non-functional for Mrs. Dalia. To resolve this barrier, the municipality must take immediate action by repairing the sidewalks, removing the obstacles, and ensuring that the ramp is suitable for use, free of cracks, and with well-defined curbs. Furthermore, it is essential for the municipality to implement ongoing monitoring of the area to ensure no new blockages occur and that the restaurant owners, Katrina, maintain the

access clear, respecting accessibility regulations. This would allow Mrs. Dalia to enjoy her visit safely and without inconvenience.

- 44.2. **Parking:** The parking lot at Katrina presents another challenge for Mrs. Dalia, as the area is paved with rocky surfaces and lacks designated spaces for people with disabilities. This poses a serious problem for her, as the absence of accessible areas close to the entrance makes it very difficult for her to access the restaurant. The obstacles caused by the rocky surface and the lack of proper signage force her to maneuver her motorized wheelchair over an unsuitable surface, which increases the risk of damage and discourages her from visiting the location.
- 44.3. **Counter:** The service counter at Katrina is too high and lacks the necessary depth for Mrs. Dalia to approach comfortably with her motorized wheelchair. Given her condition, which limits her ability to move, she cannot reach the counter to place orders or interact with the staff without external assistance. This barrier limits her autonomy because she cannot perform tasks that most customers do without difficulty. The discomfort of depending on others to carry out these activities frustrates her, and it prevents her from feeling fully independent when visiting the restaurant.
- 44.4. **Limited Space Between Tables:** Inside Katrina, the limited space between the tables presents a significant barrier for Mrs. Dalia. The lack of enough room to maneuver her motorized wheelchair makes it difficult for her to move freely between tables without depending on the help of others. This disrupts her experience because she cannot enjoy the space with freedom and comfort. Her reduced mobility forces her to seek places that do not have such restrictions, which discourages her from attempting to visit the restaurant, as the limitation in space creates discomfort and affects her independence.

44.5. To make Katrina more accessible for Mrs. Dalia, several key changes are required. The parking lot should be resurfaced with solid, smooth materials, and designated accessible parking spaces should be clearly marked and located near the entrance. Inside the restaurant, the service and souvenir counters must be lowered and deepened to allow easy access for Mrs. Dalia in her wheelchair. Additionally, the space between tables should be widened to ensure sufficient room for her to maneuver comfortably. These adjustments would allow Mrs. Dalia to visit the restaurant with ease, enjoying her experience independently and without obstacles.

44.6. Once these accessibility barriers are addressed, Mrs. Dalia will be able to visit Katrina with ease. She is eager to experience the restaurant, especially the delicious seafood dishes like the Paella and Mofongo de Mariscos. When the sidewalk is clear of obstacles, the parking lot is properly arranged, and the interior space is made more accessible, she will finally be able to navigate freely and independently, enjoying her time at Katrina. These changes will allow her to visit without relying on others for assistance, providing her with the comfort and security she needs to fully enjoy the dining experience.

Responsibility of the Municipality of Dorado and BRO PR LLC
Tres Palos Bar and Grill

45. Mrs. Dalia Vázquez is very interested in visiting Tres Palos Bar and Grill, a restaurant she has heard great recommendations about due to its delicious food and the impeccable cleanliness of the place. She is especially drawn to dishes like the steak pastelillos, which are highly appreciated for their unique flavor and the quality of the ingredients. The restaurant's atmosphere is also recognized for being welcoming and well-maintained, which makes Mrs. Dalia very curious to enjoy a dining experience there. She plans to visit the restaurant in three months, eager to try these dishes and enjoy the ambiance. However, despite her desire to visit

Tres Palos Bar and Grill, since learning in Novemeber, 2024 about the following architectural barriers present at the restaurant, she has been discouraged from doing so:

45.1. Obstructed and Damaged Sidewalk: Mrs. Dalia Vázquez is aware that the sidewalk in front of Tres Palos restaurant presents several obstacles, such as potholes, cracks, slippery grass, posts, trees, and litter. Due to her quadriplegia, which forces her to rely on a motorized wheelchair for mobility, these obstacles make it difficult for her to move. Potholes and slippery surfaces are especially problematic, as her motorized wheelchair cannot move easily over them, and objects blocking her path, such as posts and trees, force her to look for alternative routes that are not always available. For this reason, Mrs. Dalia is discouraged from visiting the place, as these difficulties interrupt her access to the restaurant and cause insecurity when trying to get there.

45.1.1. The Municipality of Dorado is responsible for ensuring that public spaces, including sidewalks, are accessible for everyone, including individuals like Mrs. Dalia Vázquez who rely on mobility aids such as a motorized wheelchair. The presence of obstacles such as potholes, cracks, slippery grass, posts, trees, and litter on the sidewalk in front of Tres Palos Bar and Grill highlights the municipality's failure to maintain and regulate public walkways properly. These barriers not only hinder Mrs. Dalia's access but also create a hazardous environment for her mobility, which is especially dangerous for someone with limited physical movement. To resolve this, the municipality must take immediate action by repairing the sidewalk, removing obstacles, and ensuring that it is regularly cleaned and maintained. This includes filling in potholes, fixing cracks, clearing away debris, and making sure that any posts or trees that block the path are properly managed. The municipality should also implement regular inspections and enforce regulations that ensure businesses

maintain clear and accessible pedestrian pathways. Addressing these issues would allow Mrs. Dalia to visit Tres Palos Bar and Grill safely and without disruption, improving her overall experience and independence.

- 45.2. Inadequate Accessible Entrance: Mrs. Dalia Vázquez is aware that the accessible entrance to Tres Palos restaurant lacks handrails, making the access difficult for her. Given her quadriplegia and total dependence on her motorized wheelchair, the lack of handrails represents a significant barrier. The absence of these support elements makes it hard for her to enter independently and safely, as she has no point of support to maneuver and guide her wheelchair at the entrance. For this reason, Mrs. Dalia is discouraged from visiting the restaurant, as she feels that the access is neither safe nor comfortable for her.
- 45.3. Difficult Access to Zones and Tables: Mrs. Dalia Vázquez is aware that Tres Palos restaurant presents difficulties in accessing its areas due to rocky surfaces near the stage and tables that have bases that block frontal access in the main service area. Due to her quadriplegia, Mrs. Dalia depends on her motorized wheelchair to access the areas of the restaurant. However, the inadequate surfaces in the lower area and the inability to approach the tables in the upper area from the front make it difficult for her to move comfortably. This lack of accessibility discourages Mrs. Dalia from visiting the place, as she cannot enjoy the dining experience as she would like due to the physical limitations she faces.
- 45.4. To address the barriers that Mrs. Dalia Vázquez faces at Tres Palos restaurant; several improvements are necessary. The accessible entrance should be equipped with handrails to provide necessary support, allowing her to enter independently. Finally, the surfaces near the stage should be repaired, and the tables in the main service area should be adjusted to allow for frontal access, enabling Mrs. Dalia to move freely and

comfortably throughout the restaurant. These modifications would ensure that Mrs. Dalia can enjoy her visit to Tres Palos restaurant safely and independently.

45.5. Once these barriers are resolved, Mrs. Dalia Vázquez would be eager to visit Tres Palos Bar and Grill. She is drawn to the restaurant because of its excellent reputation for delicious food, particularly the highly recommended steak pastelillos. The clean and inviting atmosphere of the place also makes her excited to experience the vibrant ambiance. With the necessary adjustments to ensure accessibility, such as a smoother sidewalk, proper parking, a safe and accessible entrance, and easy access to all areas, Mrs. Dalia would feel confident and comfortable visiting. These improvements would allow her to enjoy the restaurant independently, without the current obstacles that discourage her from going.

Responsibility of Municipality of Dorado and Zacarias-Navarro LLC
Rombo Asador Playero

46. Ms. Dalia Vázquez, a resident of Dorado, has long been drawn to Rombo Asador Playero, a celebrated beachfront grill known for its vibrant coastal ambiance and mastery of Puerto Rican culinary traditions. The restaurant's reputation for succulent slow-roasted pork)and its signature mariscada, a seafood platter featuring locally caught shrimp and grilled octopus served with house-made mojo criollo, has captivated her interest, particularly given its emphasis on fresh, locally sourced ingredients and rustic, open-fire cooking techniques. Rombo's ambience, enhanced by regular live music and special events, makes it an ideal destination for casual dinners, family gatherings, and cultural experiences.

47. Mrs. Vázquez intended to return to Rombo Asador Playero during the Semana Santa holidays to enjoy one of its live music events and immerse herself in its lively atmosphere. However, since December 2024, she has been deterred from visiting due to her awareness of persistent architectural barriers that prevent her from navigating the space safely and comfortably. Despite her strong desire to experience the restaurant's acclaimed flavors and relaxed seaside

environment, these accessibility challenges have consistently discouraged her from attempting to dine there, as she anticipates unequal access to the amenities and services that other patrons enjoy. The barriers she is aware of include the following:

47.1. Inaccessible Sidewalks. Mrs. Dalia Vázquez is aware that the sidewalks in front of Rombo Asador Playero are inaccessible due to various obstructions like narrow passages, cracked uneven surfaces, steep slopes, vehicles parked on the sidewalk, and no curb ramp connecting them to the street. These barriers make it impossible to pass through on her wheelchair.

47.1.1. Narrow and Damaged sidewalks: Mrs. Dalia Vázquez is aware that the sidewalks — one directly in front of Rombo Asador Playero and the other turning toward the corner— are severely deteriorated. They have cracked and uneven surfaces and steep slopes. In some sections, the sidewalks are too narrow to safely accommodate her motorized wheelchair, which requires 32 inches of clearance for stable movement. The jagged pavement and abrupt changes in elevation destabilize her wheelchair's tilt functions. Her inability to adjust her posture or brace herself makes it difficult for her to navigate the steep and narrow sidewalk. This pathway physically blocks her from approaching the restaurant, as she cannot traverse it with her motorized wheelchair.

47.1.2. Inaccessible narrow and steep sidewalk leading to the alternative entrance to the restaurant. Mrs. Dalia is aware that the sidewalk, leading to the alternative entrance to the restaurant, is too narrow and extremely steep to use on her wheelchair. The extreme incline of the sidewalk makes it nearly impossible for her motorized wheelchair to ascend safely. The narrowness of the path further restricts her ability to maneuver, making it physically strenuous and unsafe to

use. This alternative route does not provide her with an accessible or comfortable path to enter the restaurant, leaving her with no viable means of access.

47.1.3. **Illegal Parking Blocking Sidewalk and Street Access.** Additionally, Dalia observes that vehicles are routinely allowed to park illegally on both the sidewalk and the adjacent street, obstructing all potential routes to the restaurant. Cars parked partially or fully on the sidewalk force her to detour into the street, where her motorized wheelchair's low profile and limited speed make her nearly invisible to drivers. Simultaneously, vehicles parked illegally in the street narrow the roadway, leaving no safe space for her to navigate around them. Her quadriplegia prevents her from quickly maneuvering or reacting to sudden traffic movements. These obstructions create an impassable barrier, denying her any viable path to reach Rombo Asador Playero and reinforcing her exclusion from the establishment.

47.1.4. **No curb ramps connecting the sidewalks to the street.** Furthermore, Mrs. Dalia Vázquez identified that there is no curb ramps connecting the sidewalks to the street, making it difficult for her to transition from the sidewalk to the street. As a person who relies on a motorized wheelchair for mobility, Dalia needs ramps to navigate the area safely and independently. The absence of a curb ramp forces her to find an alternative route or attempt a challenging maneuver, causing unnecessary physical strain and frustration. This lack of accessible infrastructure prevents her from reaching the establishment with ease and discourages her from visiting.

47.1.5. **Since these sidewalks fall under the responsibility of the municipality of Dorado, it is their duty to ensure proper maintenance and compliance with**

accessibility standards. However, the government's continued neglect has allowed these hazardous conditions to persist, leaving both sidewalks with uneven surfaces, no ramp at the corners, and insufficient width for safe wheelchair navigation. This failure to provide accessible pedestrian routes directly impacts Dalia Vázquez, as her motorized wheelchair cannot traverse the steep, cracked, and narrow pathways.

- 47.2. Inaccessible Main Entrance with Steep Stairs and No Ramp: Mrs. Dalia Vázquez is aware that Rombo Asador Playero's main entrance consists of steep stairs with no alternative accessible pathway or ramp. This barrier directly impacts her ability to enter the restaurant independently, as her motorized wheelchair cannot safely navigate steps. Her quadriplegia (C5–C7 spinal injury) limits her upper-body strength, making it impossible to ascend stairs even with assistance. The absence of a ramp at this entrance prevents her from entering the restaurant independently, thereby denying her equal access to the establishment's amenities.
- 47.3. Non-Compliant Bar Counter: Mrs. Dalia Vázquez has identified that the bar area features a high countertop with tall seating, lacking any lowered section or accessible space for wheelchair users. Due to her quadriplegia, she experiences substantial mobility limitations. She cannot stand or transfer from her wheelchair independently, making it essential for her to have accessible seating at the bar. The high countertop and seating arrangement force her to remain isolated from the social and service areas others enjoy, as her wheelchair cannot fit comfortably into the space.
- 47.4. Restricted Passageway: In addition to the bar area, Mrs. Vázquez also identified that the passageway next to the bar is extremely narrow and further obstructed by fixed chairs, restricting her wheelchair's maneuverability. Her motorized wheelchair, which requires 32 inches of clearance for safe navigation, cannot pass through the cramped

area without colliding with furniture. This design prevents her from accessing the bar or adjacent dining zones, isolating her from social and service areas others freely use.

- 47.5. **Lack of Accessible Signage at Restrooms:** Mrs. Dalia Vázquez has identified that the restrooms at the establishment lack accessible signage. This absence of proper indicators creates confusion and makes it difficult for her to identify the restroom, which further adds to her frustration. Given her mobility limitations, Dalia needs clear signage to navigate spaces independently. The lack of accessibility awareness in this regard makes her experience even more difficult and discourages her from returning.
- 47.6. **Narrow Bathroom Door:** Dalia also noted that the bathroom door is too narrow to accommodate her 28-inch-wide wheelchair. Due to her quadriplegia and limited arm movement (ASIA 4 classification), she cannot open the door without assistance. The narrow door creates an immediate barrier, preventing her from entering the restroom independently. This design flaw restricts her ability to use the restroom without relying on others, leading to further discomfort and frustration.
- 47.7. **Cluttered Pathway to the Restroom:** Mrs. Vázquez observed that the path leading to the restroom is obstructed by tables, making the area difficult to navigate. With her limited mobility and reliance on her wheelchair, the blocked pathway becomes an obstacle course that she cannot traverse without significant difficulty. The inability to freely move through the space due to these obstructions further complicates her visit, making it unsafe and uncomfortable for her.
- 47.8. **Inadequate Bathroom Space:** Mrs. Vázquez is aware that the space inside the bathroom is too narrow for her to maneuver comfortably. As someone who relies on a motorized wheelchair, she needs enough space to move freely within the restroom. The cramped interior restricts her ability to turn around and perform necessary tasks, effectively barring her from using the restroom safely and independently.

47.9. To address the barriers at Rombo Asador Playero, the installation of a permanent ramp at the entrance would allow Dalia Vázquez to access the restaurant independently in her motorized wheelchair. Lowering a section of the bar counter and rearranging furniture to provide at least 32 inches of clearance in passageways would enable her to navigate the interior safely. Accessible restrooms with widened doors and adequate turning space must be added to accommodate her wheelchair and ensure her comfort. Additionally, The Municipality of Dorado can eliminate the barriers on sidewalks and ramps by repairing the cracked and uneven sidewalks, installing curb ramps at the corner, and enforcing no-parking zones along the street and sidewalk would create a safe and accessible route for her to approach the restaurant.

47.10. Furthermore, the Municipality of Dorado has neglected its obligation to enforce accessibility regulations, unlawfully issuing permits that allow Rombo Asador Playero to operate without addressing its architectural barriers. By approving a business lacking an accessible entrance and safe pedestrian routes—despite clear violations—the municipality has directly perpetuated Dalia Vázquez’s exclusion. This failure to uphold basic accessibility standards reinforces her experience of discrimination, as she is systematically denied the same opportunities to access and enjoy the restaurant as non-disabled patrons. Implementing the required modifications, coupled with municipal accountability, would not only rectify these injustices but also motivate Dalia to visit, knowing she can finally experience the establishment safely and equitably.

**Responsibility of Municipality of Dorado and Landy, Inc.
The Beer Shop**

48. Mrs. Dalia Vázquez has long been interested in visiting The Beer Shop, a modern convenience store in Dorado known for its wide variety of offerings, including breakfasts, lunches, and daily specials such as white rice, beans, chicken wings, and Chinese rice, all at

affordable prices. The store's reputation for fresh, hot meals—such as its \$8 lunch specials with tax included—aligns with her appreciation for its unique flavor, which she finds distinct and more flavorful compared to other similar establishments. She is particularly drawn to its breakfast options, which she has heard are both delicious and satisfying. However, since December 2024, despite her ongoing interest in enjoying its meals and purchasing its products, she has been deterred from visiting due to her awareness of the accessibility barriers present.

49. Mrs. Vázquez has plans to return to The Beer Shop in the coming months to enjoy its lunch specials, become a regular customer, and start having lunch there regularly, as she is attracted to the store's affordable prices. Yet, she is currently dissuaded from doing so by the persistent barriers that prevent her from accessing the store safely and independently. These barriers include the following:

49.1. Inaccessible Sidewalk: Mrs. Dalia Vázquez faces significant barriers navigating the sidewalk to The Beer Shop due to obstructions like a cone and a sign, as well as a dangerously narrow path near planted trees, making passage in her motorized wheelchair impossible.

49.1.1. Obstructed and Narrow Sidewalk. Dalia Vázquez is aware that the sidewalk leading to The Beer Shop is partially blocked by a cone and the establishment's sign, while further ahead, near planted trees, the path narrows drastically. The cramped space is too tight for her motorized wheelchair to pass safely, and her quadriplegia limits her ability to adjust her position or maneuver around obstacles. Her lack of sensation below the chest prevents her from detecting subtle scrapes or collisions with the uneven edges, leaving her stranded and unable to proceed toward the business.

- 49.1.2. Insufficiently Wide Access Ramp. Dalia identifies that the ramp on the right side of the sidewalk is too narrow for her wheelchair to navigate. Her Permobil M300 motorized wheelchair cannot fit through the tight space, and her limited left-arm strength makes it impossible to angle the chair without risking instability. The absence of tactile feedback due to her spinal injury heightens her vulnerability to unnoticed collisions with the ramp's edges, physically blocking her entry into the store.
- 49.1.3. Since the sidewalk and access ramp leading to The Beer Shop are part of public infrastructure, it is the Municipality of Dorado's responsibility to ensure they comply with accessibility standards. However, the Municipality's failure to address the obstructed and narrow sidewalk, along with the insufficiently wide ramp, has created barriers that prevent Dalia from accessing the business safely. This neglect limits her mobility and excludes her from using the space independently, reinforcing practices that prevent equal access for individuals with disabilities.
- 49.2. Narrow Entrance with Obstructing Door: Mrs. Dalia Vázquez identified that the entrance to the establishment has a very narrow doorway, making it impossible for her to pass through with her powered wheelchair. Due to her quadriplegia, which limits her ability to adjust her position or use her arms effectively, this narrow entryway directly restricts her ability to access the space independently, causing significant difficulty and physical strain.
- 49.3. Uneven Flooring: Mrs. Dalia Vázquez has identified the uneven flooring in key areas of the shop, especially in the center of the establishment. Due to her quadriplegia and limited upper body mobility, she cannot stabilize her powered wheelchair effectively on these irregular surfaces. The instability caused by the uneven flooring directly

affects her ability to move independently, increasing physical strain and making her navigation of the space more difficult.

- 49.4. Obstructive Table Arrangement: Mrs. Dalia Vázquez is aware of the barrier resulting from the placement of tables that makes it difficult to traverse certain areas; the obstructive layout interferes with the maneuverability of her powered wheelchair, immediately hindering her access and mobility within the space.
- 49.5. Inaccessible tables: Mrs. Dalia Vázquez is also aware that the tables in the establishment have central bar supports and lack a designated accessible option for wheelchair users. Due to her quadriplegia and limited upper body mobility, she is unable to maneuver her powered wheelchair close enough to these tables to sit comfortably. The current seating design fails to meet her needs, directly preventing her from accessing the dining area and restricting her independence.
- 49.6. High Counters with No Underneath Access: Mrs. Dalia Vázquez is aware that the counters throughout the establishment are too high and lack any space underneath for frontal access. Due to her quadriplegia, which limits her upper body mobility and requires her to rely on her powered wheelchair, this design directly obstructs her ability to approach the counter and engage with service areas. The lack of accessible space prevents her from receiving assistance independently, further limiting her ability to fully participate in the establishment's services.
- 49.7. Protruding Product Shelves: Mrs. Dalia Vázquez is aware of the barrier created by product shelves that protrude in front of one of the entrances; their placement encroaches on the available space, directly obstructing her powered wheelchair and complicating her access due to her limited mobility.
- 49.8. To address the barriers Landy, Inc, needs to make several adjustments to ensure accessibility for Mrs. Dalia Vazquez. The entrance door should be repositioned or

automated to eliminate obstructions, and uneven flooring must be leveled to stabilize Dalia's Permobil M300 motorized wheelchair. Tables should be rearranged to provide 32-inch clearance, with at least one accessible table featuring knee space and no obstructive base. Lowering a section of each counter and creating underspace access would allow Dalia to interact independently, while repositioning protruding shelves would open aisles for seamless navigation. These modifications would empower Dalia to visit confidently, knowing she can safely access the establishment's services, products, and community spaces like any other patron.

Responsibility of Municipality of Dorado and The Pizza Boy Corp.
The Pizza Boy

50. Ms. Dalia Vázquez has been eager to visit The Pizza Boy, a popular pizzeria in Dorado known for its authentic, wood-fired pizzas and creative toppings like plantain, chorizo, and local cheeses. The restaurant's reputation for its crispy, thin-crust pizzas and its welcoming, casual atmosphere has captured her interest, particularly given its focus on fresh, high-quality ingredients and its unique blend of traditional and innovative flavors. Located in a convenient area, The Pizza Boy's vibrant setting, often bustling with locals and visitors, makes it an appealing spot for casual meals and social gatherings. Mrs. Vázquez had planned to return to The Pizza Boy in the coming months to try more of its unique dishes and enjoy the vibrant atmosphere, particularly to take advantage of the Semana Santa holidays. However, since December 2024, her awareness of the following accessibility barriers has deterred her from visiting:

50.1. Inaccessible Sidewalk: Mrs. Dalia Vázquez struggles to navigate in her wheelchair due to tables and chairs blocking the sidewalk, as well as large ice containers reducing the available space. These obstacles prevent her from moving independently and safely.

- 50.1.1. Obstructed Front Sidewalk Due to Outdoor Seating: Mrs. Dalia Vázquez notices that tables and chairs placed outside block the sidewalk, restricting her ability to pass through. Since she relies on a motorized wheelchair, she requires a clear and unobstructed path, but the placement of the outdoor seating forces her to either navigate around it or seek assistance to move forward. This obstruction limits her ability to move independently in the surrounding area.
- 50.1.2. Obstructed Sidewalk to the left of the Establishment Due to Large Ice Containers: Mrs. Dalia Vázquez is aware that the sidewalk perpendicular to the establishment is obstructed by large ice containers, significantly narrowing the available space. Given the width of her motorized wheelchair, this obstruction makes it extremely difficult for her to pass through safely, forcing her to navigate with precision in a confined area or find an alternative route. The reduced clearance limits her independent movement and creates an unnecessary challenge in accessing the business.
- 50.1.3. The sidewalks in question are part of public space and fall under the responsibility of the municipality of Dorado, which has failed to enforce accessibility regulations. This lack of oversight has allowed outdoor seating to obstruct the walkway, restricting passage for wheelchair users like Mrs. Dalia Vázquez and limiting her independence. Additionally, the sidewalk adjacent to The Pizza Boy is similarly impacted, as large ice containers significantly narrow the passage, making safe navigation nearly impossible for her. The municipality's inaction has directly contributed to these accessibility barriers, preventing Mrs. Vázquez from moving freely and independently in the area.
- 50.2. Entrance with a Step: Mrs. Dalia Vázquez is aware that the entrance to The Pizza Boy has a step and no ramp, which prevents her from entering independently. As she uses a

motorized wheelchair, she cannot lift herself over the step, making it impossible to access the establishment without external assistance. This barrier forces her to rely entirely on someone else's strength to be carried inside, restricting her ability to enter the restaurant freely.

- 50.3. French Door with Outward-Pulling Handle: Dalia Vázquez finds that the entrance has a French door with a handle that must be pulled outward, which presents a significant challenge for her. Due to her limited upper body strength and restricted movement in her arms, she cannot pull the door open while maneuvering her wheelchair. This type of door requires a motion that she is physically unable to perform, making it nearly impossible for her to enter without external help.
- 50.4. Unsecured and Thick Doormat: Mrs. Dalia Vázquez notices that there is a thick doormat that is not secured to the floor, which poses an immediate obstacle when trying to maneuver her wheelchair. Since she needs a stable surface to move safely, the mat can shift under her wheels or cause unnecessary resistance, making it difficult for her to maintain control of her mobility. This creates an additional challenge in navigating the entrance without discomfort or risk of instability.
- 50.5. Narrow Space Between Tables: Mrs. Dalia Vázquez is aware of the limited space between tables. As her motorized wheelchair requires ample room to navigate, the tight layout restricts her ability to move freely. She finds herself unable to turn or position herself comfortably, limiting her ability to choose a suitable spot to dine. This lack of space makes her movement unnecessarily complicated and reduces her options for seating.
- 50.6. Tables with Central Support and No Accessible Option: Dalia Vázquez realizes that all the tables have a central support with extended legs, which interferes with the positioning of her wheelchair. She is unable to pull up close enough to the table

because the support structure blocks her approach. Additionally, she knows there is any designated accessible table, leaving her with no adequate space to dine comfortably. This setup prevents her from properly aligning her wheelchair, making it impractical for her to enjoy a meal without significant difficulty.

50.7. High Counter with Chairs in Front: Mrs. Dalia Vázquez observes that the counter is too high for her to comfortably reach, and that chairs placed in front create an additional barrier. Given her limited arm strength and range of motion, she cannot interact with the counter effectively, whether to place an order or receive her food. The presence of chairs further blocks her access, making it impossible for her to use this area as intended.

50.8. To address these barriers, The Pizza Boy must install a ramp at the entrance to eliminate the step; replace the outward-pulling French door with an automatic or lever-handled door operable with minimal strength; secure or remove the unstable doormat; rearrange indoor seating to widen aisles and add wheelchair-accessible tables with under-table clearance; and lower a section of the counter while removing chairs in front to enable independent ordering. These changes would eliminate the physical and logistical hurdles she faced, restoring her ability to navigate freely and dine with dignity, directly resolving the exclusion she experienced, and ultimately encouraging her to return, knowing the space now prioritizes her safety and autonomy.

Responsibility of the Municipality of Dorado and Rondo, Inc.
Villa Dorada D'Alberto

51. Mrs. Dalia Vázquez enthusiastically enjoys seafood. Her love for marine flavors is reflected in her preference for shrimp cocktail, served well chilled, with its perfect blend of fresh shrimp, tomato sauce, avocado, and a hint of lime. Likewise, fish broth is undoubtedly her refuge on cooler days, and she prefers it piping hot, with a tomato and epazote base that fills the kitchen with its comforting aroma. For Mrs. Dalia, seafood is not just a culinary pleasure but a

connection to her history, her roots, and the happiest moments of her life. For this reason, she shows interest in visiting the restaurant Villa Dorada D'Alberto, as she hears that its seafood specialties are exceptional. However, since January, 2025, she has been aware of the architectural barriers of the establishment. Additionally, to reach the place, Mrs. Dalia must transit along the sidewalk located in front of the establishment at Street E #99, Dorado, PR 00646-0000, with coordinates 18.47412914453545, -66.28042510275267. She considers it important for access to be adequate and safe. However, she has been aware that the conditions of the sidewalk pose an additional challenge on her way. As a result, despite wanting to enjoy the dining experience the restaurant offers, the lack of accessibility makes her feel dissuaded from going.

52. Mrs. Dalia Vásquez intends to return to Villa Dorada D'Alberto restaurant in the next two months to enjoy her shrimp cocktail once again. However, she is currently dissuaded from doing so due to the accessibility barriers she has identified on the sidewalk and at the establishment, which hinder her access and raise concerns about her safety. These barriers make her feel uncomfortable and prevent her from returning until these accessibility issues are addressed. The barriers that Mrs. Dalia is aware are:

52.1. Inaccessible sidewalk: Mrs. Dalia faces significant mobility challenges due to the deteriorated sidewalk in front of Villa Dorada D'Alberto, with deep cracks and uneven areas that create an unstable surface, causing discomfort and risk. The accessibility ramp is also in poor condition, with faded paint, incorrect slope, cracks, and overgrown weeds, further hindering safe movement

52.1.1. Deteriorated Sidewalk: Mrs. Dalia is aware of the severe deterioration of the sidewalk in front of Villa Dorada D'Alberto, which poses a significant barrier to her mobility and safety. The surface is marked by deep cracks and uneven areas, creating an unstable terrain that directly affects her movement. These

irregularities force her mobility device to make constant adjustments, increasing the risk of sudden jolts or unexpected wheel blockages. This not only slows her progress but also causes unnecessary discomfort and fatigue, turning a smooth journey into a continuous challenge. Additionally, the deteriorated condition of the sidewalk reflects a lack of maintenance and concern for accessibility, sending a message of exclusion to those who rely on safe infrastructure for independent movement. As a result, she feels dissuaded from using this area, as the lack of proper conditions affects her confidence and overall well-being.

52.1.2. Mrs. Dalia is also aware of the challenges with the accessibility ramp, which has faded paint, an incorrect slope, deep cracks, and overgrown weeds that interfere with its use. The lack of visible markings makes it difficult to identify the ramp's boundaries, affecting the precision needed for a safe ascent and descent. Additionally, the improper slope requires extra effort from her mobility device, making movement more complex and less stable. The cracks and vegetation affect the surface, creating vibrations and jolts that make it difficult to maintain a smooth ride. A safe and accessible pathway instead becomes an obstacle, forcing her to rely on precise maneuvers to avoid complications. The poor condition of this ramp not only limits her ability to move safely but also highlights a lack of commitment to accessibility. As a result, she feels dissuaded from using this area, as the uncertainty of encountering obstacles affects her confidence and autonomy.

52.1.3. Despite the fact that the Municipality is responsible for maintaining public infrastructure and ensuring accessibility, it has shown a lack of action regarding these deficiencies. Mrs. Dalia is aware that these barriers have

existed for some time, yet the municipality has not intervened to correct them, demonstrating a lack of commitment to accessibility and the well-being of people with reduced mobility. The municipality's inaction has turned these issues into persistent obstacles, affecting Mrs. Dalia's autonomy and discouraging her from returning to the establishment. The Municipality has the obligation to take immediate action to ensure that access is adequate and safe for everyone, regardless of their physical condition, which has not happened to date.

52.2. Obstruction by Doormat: Mrs. Dalia Vásquez is aware that the main entrance of Villa Dorada D'Alberto presents a barrier that hinders her access: a doormat obstructing the passage. While this element seems harmless, it represents a significant obstacle for those who require a clear and even entryway. Its material and placement creates resistance to movement, become entangled with assistive devices, or even cause unintended slipping, affecting stability and safety when entering the establishment. For Mrs. Dalia, this doormat presents a problem from the moment she tries to cross the entrance. The unstable surface of the mat prevents smooth transit, making movement difficult and requiring additional effort to navigate over it. The risk of her assistive device getting stuck or losing traction creates tension and turns the simple act of entering the restaurant into an uncomfortable and frustrating process. This barrier not only compromises her comfort and safety but also makes her feel dissuaded from visiting the place, despite her interest in enjoying the dining experience the establishment offers.

52.3. Uneven Door Thresholds: Mrs. Dalia Vásquez is aware that the doors connecting different areas inside Villa Dorada D'Alberto have uneven thresholds, which makes mobility difficult in her wheelchair. These irregularities in the flooring create

resistance to movement and require additional maneuvers to cross them safely. The lack of a continuous, level surface turns each transition between areas of the restaurant into a challenge, affecting her stability and comfort while moving, as she has to exert extra effort to overcome the thresholds. Every time she wants to cross from one space to another, she is forced to make strained movements, which causes tension and reduces the fluidity of her movement. The abrupt movements caused by these uneven thresholds affect her control of the wheelchair, increasing discomfort. This barrier not only limits her access to other areas of the establishment but also dissuades her from visiting, as the difficulty in moving from one place to another makes the experience feel uncomfortable and inaccessible.

- 52.4. Space Organization That Obstructs Comfortable Circulation: Mrs. Dalia Vásquez is aware that the organization of elements inside the restaurant makes comfortable circulation difficult, as the arrangement of tables, chairs, and other objects creates a narrow space that limits her ability to move in her wheelchair. This makes every path require precise and constant maneuvers to avoid blockages or collisions, which becomes even more challenging due to her mobility restrictions. The lack of wide and clear walkways restricts her autonomy and makes moving inside the establishment a complicated, exhausting, and, in many cases, dangerous process. For Mrs. Dalia, this layout represents a tangible barrier that directly affects her experience at the restaurant. The need for constant adjustments in her wheelchair to maneuver through the tight space creates discomfort and makes her movement difficult, as she cannot move naturally or smoothly. The feeling of being trapped between furniture and the constant struggle to maneuver in her wheelchair turns her visit to the restaurant into a frustrating and unwelcoming experience, severely affecting her comfort, independence, and ultimately discouraging her from visiting the place.

- 52.5. Inaccessible Tables Due to Support Bar Located at the Bottom: Mrs. Dalia is aware that the tables present a structural barrier that makes them difficult to use: a support bar located at the bottom. This structure limits the available space underneath the table, preventing Mrs. Dalia from positioning herself comfortably. The presence of this bar creates an obstacle that restricts proper access to the table, affecting posture and making dining more challenging. The lack of free space under the table prevents her from getting close enough, forcing her into an awkward and strained position just to reach her food. The difficulty in finding a comfortable seating position causes tension in her body and makes dining at the restaurant a frustrating and unpleasant experience. This limitation not only affects her comfort but also makes her feel dissuaded from visiting the restaurant.
- 52.6. Inaccessible Chairs Due to Height: Mrs. Dalia Vásquez is aware that the chairs present an accessibility barrier due to their height. The lack of adjustable seating or chairs at an appropriate level makes them difficult for Mrs. Dalia to use, as she requires a specific height to sit comfortably. The excessive or inadequate height of the chairs prevents secure and stable access, affecting the ability to fully enjoy the space and the meal. For Mrs. Dalia, this barrier represents a limitation that compromises her experience at the restaurant. The inability to use the chairs properly makes it difficult for her to sit comfortably at the table, forcing her to make unnecessary adjustments that create discomfort and make her visit less enjoyable. The lack of accessible seating not only affects her comfort and autonomy but also makes her feel dissuaded from visiting the restaurant, despite her interest in enjoying the atmosphere and food the establishment offers.
- 52.7. Service Counters Too High: Mrs. Dalia Vásquez is fully aware that the service counters at Villa Dorada D'Alberto are excessively high. The lack of a properly

leveled surface prevents Mrs. Dalia, who requires a lower level to interact comfortably, from doing so adequately with the restaurant staff. This height difference not only makes visibility and direct communication difficult, but it also severely impacts her ability to access services independently, as she must exert considerable effort to interact with the staff. These counters represent a significant barrier for her, as they prevent her from performing simple tasks within the restaurant, such as placing orders, receiving information, or making payments, without needing assistance or making strained movements. The height of the surface forces Mrs. Dalia to make additional efforts that are not only uncomfortable but also increase frustration and the sense of being less independent. This further limits her autonomy within the restaurant, as she is forced to rely on the staff for activities that are supposed to be simple and accessible. The lack of accessible service counters not only affects her comfort and safety but also discourages her from visiting the place, despite her interest in enjoying the food and atmosphere, as the physical barriers make it difficult for her to have a comfortable and satisfactory experience.

- 52.8. To improve accessibility at Villa Dorada D'Alberto and ensure a comfortable and inclusive experience, it is essential to implement solutions that eliminate existing barriers: At the main entrance, it is recommended to remove the doormat currently obstructing access or replace it with a completely fixed, non-slip surface. This solution would eliminate the risk of tripping, entanglement, or slipping, allowing safe and uninterrupted passage into the establishment. To facilitate movement within the restaurant, it is crucial to remove uneven thresholds at door bases. Installing smooth ramps or leveling the floor will create continuous access between different spaces. This will ensure fluid circulation without the need for additional maneuvers that could hinder movement. Another key aspect is the reorganization of furniture to allow for

comfortable circulation within the restaurant. Tables and chairs should be strategically rearranged to ensure wide and clear pathways, allowing for unrestricted movement. A more accessible layout provides Mrs. Dalia with greater autonomy and comfort, allowing her to move freely and navigate the space without feeling restricted by tight areas or limited space.

52.9. Tables should also be modified to eliminate structural barriers that make them difficult to use. It is advisable to choose models without support bars at the bottom, allowing for proper positioning and ensuring a comfortable posture while dining. This will prevent the discomfort of forced positions that could affect the dining experience. Regarding chairs, it is recommended to offer adjustable-height options or a variety of accessible seating arrangements that allow all individuals to find a suitable position at the table. The availability of ergonomic chairs will enhance comfort and ensure that every guest can enjoy their meal without inconvenience. Finally, service counters should be adapted to provide a lower-height section that allows for smooth interaction with restaurant staff. Installing an accessible counter will make it easier for guests to place orders, receive information, or make payments without extra effort, promoting a more inclusive and equitable customer experience. The implementation of these changes will not only improve the restaurant's accessibility but also eliminate the barriers that currently dissuade Mrs. Dalia Vásquez from visiting. With a safe, comfortable, and well-designed environment that ensures unobstructed mobility, she will be able to access the establishment without difficulties, enjoy her dining experience, and feel truly welcomed.

Responsibility of the Municipality of Dorado and Rondo, Inc.
Villa Dorada Sport Bar & Grill

53. Mrs. Dalia Vásquez finds a special pleasure in fast food, a type of cuisine that offers her both convenience and immediate satisfaction. Among all fast food dishes, the hamburger holds a

special place in her heart. She loves the combination of a soft and fluffy bun, the juiciness of freshly cooked meat, and the creamy touch of the condiments. Due to her love for fast food, especially hamburgers, Mrs. Dalia has a special interest in Villa Dorada Sport Bar & Grill, as she is attracted to the possibility of finding unique and customizable combinations on the menu, allowing her to enjoy her favorite dish just the way she likes it. However, Mrs. Dalia is aware that Villa Dorada Sport Bar & Grill presents architectural barriers that hinder accessibility to the establishment. Additionally, to reach the place, she must traverse the sidewalk located at Urb Sardinera, Beach E97, Street F, Dorado, PR 00646-0000 with coordinates 18.473595773260257, -66.28107367502678, which is in conditions that do not guarantee safe and comfortable passage.

54. The combination of obstacles in the establishment's infrastructure and the difficulties along the preceding route make Mrs. Dalia's visit, a complicated and unwelcoming process. As a result, she feels dissuaded from visiting Villa Dorada Sport Bar & Grill, despite her interest in enjoying its atmosphere and culinary offerings. Mrs. Dalia wants to visit Villa Dorada Sport Bar & Grill during the next three months to enjoy the food and its atmosphere, but especially its signature hamburger. However, she is dissuaded from doing so by the continued presence of accessibility barriers that hinder her movement and autonomy within the establishment. Despite her desire to enjoy her favorite dish in a pleasant environment, the access difficulties along the sidewalk and the architectural barriers inside the restaurant prevent her from having a safe and satisfactory visit. The barriers that Mrs. Dalia is aware are:

- 54.1. Inaccessible Sidewalk: Mrs. Dalia encounters serious mobility issues due to the damaged sidewalk in front of Villa Dorada D'Alberto, which is full of deep cracks and uneven spots, making it unsafe and uncomfortable to navigate. The accessibility ramp is also poorly maintained, with worn-out paint, an incorrect slope, cracks, and overgrown weeds, all of which complicate her movement.

54.1.1. Sidewalk Corner Without an Accessible Ramp: Mrs. Dalia Vásquez is aware that, to access Villa Dorada Sport Bar & Grill, she must traverse a sidewalk corner that has a level difference but lacks an accessible ramp. The absence of a ramp at this point makes movement difficult for those who require a smooth and uninterrupted transition. The lack of a gradual slope between the street and the sidewalk creates a barrier that prevents safe and autonomous passage, affecting the mobility of individuals who need accessible conditions to move comfortably. For Mrs. Dalia, this barrier represents a disruption in her route. The lack of a ramp forces her to seek complicated alternatives to continue her way, causing discomfort and additional effort. Additionally, the abrupt level change results in sudden movements of her assistive device, affecting her stability and increasing the risk of unsafe situations. This difficulty not only compromises her comfort but also makes her feel dissuaded from visiting the establishment, despite her interest in doing so.

54.1.2. Mrs. Dalia is also aware that the sidewalk she must traverse to reach Villa Dorada Sport Bar & Grill is in poor condition, with cracks and potholes that affect the safety and stability of those using it. The irregularities in the surface create an uneven path that makes smooth and stable movement difficult, posing a risk for individuals who require optimal accessibility conditions as Mrs. Dalia. This deteriorated surface is an obstacle that makes her journey uncomfortable and exhausting, as the cracks and potholes cause abrupt movements in her assistive device, affecting her control and stability. The lack of a well-maintained sidewalk increases her physical effort and causes unnecessary strain, turning her route into an unpleasant experience. This

barrier also makes her feel dissuaded from visiting the establishment, despite her interest in enjoying the place.

54.1.3. Additionally, Mrs. Dalia is aware that the sidewalk is obstructed by placed elements like tables, significantly reducing the available space for pedestrian transit. This lack of space represents a constant barrier for her. The narrowed sidewalk forces her to maneuver precisely to avoid colliding with objects placed along the way, creating stress and making her journey more difficult. The need to navigate around these obstacles makes her route more complex and less fluid, affecting her autonomy and comfort. This situation not only causes her discomfort but also makes her feel dissuaded from visiting the establishment.

54.1.4. The Municipality has the responsibility to maintain sidewalks in good condition and free of obstacles to ensure a safe and comfortable passage for Mrs. Dalia. Sidewalks should be properly designed to allow smooth access to establishments without impediments that hinder movement. Although the Municipality is aware of the problem of obstructed and deteriorated sidewalks in front of various establishments, it has not taken action to correct these deficiencies. This inaction perpetuates discrimination against Mrs. Dalia, as by failing to intervene, she is being denied adequate and safe access to public spaces. The lack of maintenance and the obstruction of the sidewalks continue to be barriers that limit her autonomy, increasing her frustration and excluding her from a good experience.

54.2. Service Counters Too High: Mrs. Dalia is aware that the service counters inside Villa Dorada Sport Bar & Grill present an accessibility barrier due to their excessive height. The lack of a properly leveled area makes interaction with the restaurant staff difficult,

as she cannot comfortably reach the counter while in her wheelchair, forcing her to make uncomfortable and strained movements. The height difference creates a visual and communication barrier, affecting her ability to place orders or receive information comfortably. The elevated height prevents her from navigating the space naturally, making it harder to place orders or make payments without additional effort. The need to rely on others to complete these interactions causes her discomfort and frustration. This lack of accessibility not only impacts her experience at the restaurant but also makes her feel discouraged from visiting the place.

54.3. Inaccessible Tables Due to the Support Bar Located in the Lower Area: Mrs. Dalia is aware that the tables inside Villa Dorada Sport Bar & Grill present a critical structural barrier due to a support bar located in the lower area. This bar limits the space underneath the table, preventing Mrs. Dalia from positioning herself correctly in her wheelchair. As a result, she is forced to adopt an uncomfortable and unnatural posture to reach her food, which causes significant physical tension. The lack of adequate space for her wheelchair not only affects her comfort but also compromises her safety, as she has to maneuver in a limited space without the freedom of movement needed to maintain stability. This structural barrier turns every meal into a physical challenge, causing discomfort and frustration, and making her feel discouraged from returning to the establishment.

54.4. To improve accessibility at Villa Dorada Sport Bar & Grill and eliminate the barriers that hinder Mrs. Dalia Vásquez's mobility, it is essential to implement appropriate solutions that ensure a more inclusive and safe environment. Inside the establishment, service counters must be adapted to include a lower-height section. Adding an accessible area will allow Mrs. Dalia to interact directly with the restaurant staff, place orders, and make payments without relying on assistance from others. This

modification will ensure a more autonomous and equitable experience, eliminating the communication barrier she currently faces. Finally, the tables with a support bar in the lower area should be replaced or redesigned, as this structure prevents Mrs. Dalia from positioning herself properly at the table. Choosing tables with an open-bottom design will allow her to sit comfortably, avoiding awkward or strained postures that could affect her dining experience. Implementing these solutions will not only improve accessibility at Villa Dorada Sport Bar & Grill but also eliminate the barriers that currently dissuade Mrs. Dalia from visiting. With an environment adapted to her needs, she will be able to access the restaurant without difficulties, enjoy her meal, and feel welcomed in the establishment.

**Responsibility of the Municipality of Dorado and Goldo's Barbecue Corp.
Don Tako Cantina Mexicana**

55. Mrs. Dalia Vásquez has a great enthusiasm for Mexican food, and Don Tako Cantina Mexicana is a particularly appealing option for her to enjoy the intense and diverse flavors she loves. The combination of fresh ingredients, well-balanced spices, and traditional preparations makes every dish at this restaurant a sensory experience that transports her to the rich gastronomy of Mexico. Additionally, the decoration inspired by Mexican culture and the warmth of the service make the experience even more enjoyable. However, since December 2024, Mrs. Dalia has been aware that reaching the restaurant presents a challenge, as she must traverse the sidewalk located at 9 Cll B, Dorado, PR 00646-0000, with coordinates 18.473378372809094, -66.28018895152259, whose conditions do not ensure a safe and comfortable passage. Additionally, she is also aware that Don Tako Cantina Mexicana has architectural barriers that compromise her experience as a customer with reduced mobility. Due to these factors, she feels dissuaded from visiting the establishment.
56. Mrs. Dalia has the intention to visit Don Tako Cantina Mexicana during the next three months to enjoy its food, especially its traditional burrito, but she is currently dissuaded by the

continued presence of accessibility barriers that hinder her movement and autonomy. Despite her interest in enjoying the authentic flavors of Mexican cuisine and the warm atmosphere of the restaurant, the difficulties in accessing the establishment due to the poor condition of the sidewalk and the architectural barriers inside the restaurant prevent her from having a safe and comfortable visit. The barriers that Mrs. Dalia is aware of are:

56.1. Sidewalk in Poor Condition: Mrs. Dalia Vásquez is aware that the sidewalk in front of Don Tako Cantina Mexicana is in significant disrepair, making safe and comfortable passage difficult. The uneven surface, pronounced cracks, sinkholes, and water-filled craters pose a risk to her stability and mobility. Additionally, patches of overgrown vegetation encroach on the walkway, further reducing the available space for unobstructed movement. The poor condition of the sidewalk turns her journey into a constant challenge. The lack of a smooth surface causes abrupt movements in her assistive device, affecting her control and safety. The insecurity and additional effort required to navigate these conditions make her feel dissuaded from visiting the restaurant.

56.1.1. The Municipality has a direct and fundamental responsibility for maintaining and adapting public infrastructure, especially regarding accessibility. Despite being fully aware of these deficiencies, the Municipality has not taken the necessary steps to correct them. The Municipality's inaction perpetuates discrimination by preventing Mrs. Dalia from accessing public spaces in a dignified and safe manner. This omission not only affects her autonomy but also creates an exclusionary environment that reinforces inequality. The lack of adequate and safe access on the sidewalk in front of the restaurant is a clear example of how the Municipality's lack of commitment contributes to Mrs. Dalia's marginalization by failing to guarantee an accessible environment. The

Municipality has a legal and moral obligation to act immediately to remove these barriers, ensuring Mrs. Dalia's full inclusion and respecting her right to independent and safe mobility.

- 56.2. **Bar Stools Inaccessible Due to Height:** Mrs. Dalia is fully aware that the high stools at the bar in Don Tako Cantina Mexicana represent a significant accessibility barrier, as their excessive height prevents her from using them comfortably and safely. Relying on her wheelchair, Mrs. Dalia cannot access these seats without difficulty, which limits her ability to integrate into this area of the restaurant and enjoy her meal. The lack of seating options at an accessible height deeply affects her experience, as she cannot independently enjoy the space. This barrier reinforces her sense of exclusion, as she is forced to rely on others for something as simple as sitting down, which causes her discomfort and frustration, discouraging her from returning to the establishment.
- 56.3. **Service Counters Too High:** Mrs. Dalia is aware that the service counters at Don Tako Cantina Mexicana represent a critical barrier due to their excessive height. This severely hampers her ability to interact with the restaurant staff, as being in her wheelchair, she cannot comfortably reach the counter to place an order or receive information. This height difference not only limits her autonomy but also creates a visual and communication barrier, preventing her from enjoying the experience as other customers would. Having to rely on others to complete simple interactions such as placing an order or making a payment causes her discomfort and frustration, affecting her overall well-being and discouraging her from returning to the establishment. The lack of an accessible counter section reinforces her sense of being excluded, which greatly impacts her experience.
- 56.4. **Elements Placed in a Way That Obstructs Circulation:** Mrs. Dalia is fully aware that inside Don Tako Cantina Mexicana, various elements are arranged in a way that

obstructs circulation and severely hinders her mobility. The placement of furniture and decorative objects in the path forces her to make constant maneuvers to avoid obstacles, compromising her stability and safety. Every movement within the establishment becomes a challenge, causing her physical and emotional discomfort. The lack of a clear, accessible space to move freely reinforces her feeling of being treated as a secondary visitor, preventing her from enjoying the atmosphere and services naturally. The presence of these obstacles discourages her from visiting the place, as she cannot move freely without feeling insecure.

56.5. **Narrow Circulation Space:** Mrs. Dalia is fully aware that the arrangement of tables and chairs inside Don Tako Cantina Mexicana creates a narrow circulation space that makes it extremely difficult for her to move around the restaurant. The lack of wide, clear walkways forces her to make constant adjustments to navigate, increasing the risk of falls or accidents. This space arrangement limits her autonomy and increases the physical effort required to move, affecting her comfort and independence. Having to constantly fight against physical barriers inside the restaurant creates a sense of frustration and hopelessness, as she cannot enjoy the place without obstacles. The lack of an accessible space reinforces her feeling of being excluded and discourages her from returning, as each visit becomes an unnecessary physical challenge.

56.6. To ensure that Don Tako Cantina Mexicana is an accessible and comfortable space for Mrs. Dalia Vásquez, it is essential to implement solutions that eliminate the barriers currently affecting her mobility. Inside the restaurant, the addition of accessible seating at the bar should be considered, ensuring that individuals who cannot use high stools can also enjoy that area. Providing seating options with adjustable heights or spaces adapted to different needs would promote greater inclusivity within the establishment. Additionally, it is crucial to redesign the service counters that are too

high by incorporating a lower section. This modification would allow Mrs. Dalia to interact with the staff without difficulty and place her order independently. Having a designated lower counter area would improve communication and make the service more equitable for all customers. To improve movement within the restaurant, it is necessary to rearrange elements that obstruct circulation. Removing unnecessary objects and repositioning furniture that limits mobility will create a more fluid and accessible layout. Likewise, optimizing the arrangement of tables and chairs will help widen pathways and prevent customers with reduced mobility from struggling in a space that is too narrow for easy movement. Implementing these solutions will not only improve accessibility at Don Tako Cantina Mexicana but also eliminate the obstacles that currently dissuade Mrs. Dalia from visiting.

Responsibility of the Municipality of Dorado and Green Bites Corp.
Green Bites

57. Mrs. Dalia Vásquez fully enjoys the products offered by an organic cafe. Her love for fresh and natural ingredients leads her to choose, without hesitation, a specialty coffee made from sustainably grown beans. For her, visiting an organic café is much more than just a culinary experience; it is an encounter with authenticity, a space where flavor, health, and respect for nature come together in every sip and every bite. For this reason, Mrs. Dalia wishes to visit Green Bites, an organic café that has caught her attention for its offering of fresh and natural ingredients, aligned with her lifestyle and culinary preferences. However, since February, 2024, she has been aware that the establishment presents architectural barriers, which pose an obstacle to her access and comfort. Additionally, to reach Green Bites, Mrs. Dalia must walk along the sidewalk located in front of the establishment, at #282 Méndez Vigo Rd, Dorado, PR 00646-0000, with coordinates 18.458546771785723, -66.25976072202899. However, she is aware that the conditions of the sidewalk poses an additional challenge on her way. Due to

these factors, although she wants to enjoy the culinary experience that Green Bites offers, the lack of accessibility makes her feel dissuaded from visiting the place.

58. Mrs. Dalia intends to visit Green Bites during the next three months to enjoy its culinary experience, especially the fresh and natural products she loves, and to enjoy a delicious organic coffee. However, she is discouraged by the continued presence of accessibility barriers that hinder her movement and autonomy. Despite her interest in enjoying the authentic and healthy flavors of the café, the access difficulties to the establishment due to the conditions of the sidewalk and the architectural barriers inside the restaurant prevent her from having a safe and comfortable visit. The barriers are:

58.1. Inaccessible Sidewalk: Mrs. Dalia Vásquez faces multiple accessibility barriers near Green Bites, including an uneven sidewalk with cracks, level differences, and obstacles like poles that restrict her mobility. The lack of a proper access ramp at the nearby intersection forces her to take longer, less safe routes, hindering her independence and comfort.

58.1.1. Sidewalk with Uneven Surface: Mrs. Dalia Vásquez is aware that the sidewalk in front of Green Bites has an uneven surface, making it difficult to walk safely and comfortably. Variations in the pavement, including pronounced level differences, deep cracks, and worn-out areas, create an unstable path that affects her mobility. The lack of a uniform surface causes abrupt movements in her assistive device, compromising her stability and control. This situation not only poses a safety risk but also increases her physical effort to maintain a stable trajectory, making her feel dissuaded from visiting the establishment.

58.1.2. Along the sidewalk in front of Green Bites, Mrs. Dalia Vásquez is aware of the presence of poles placed within the pedestrian pathway, significantly reducing the available space for her mobility. The placement of these obstacles prevents

her from maneuvering smoothly and safely, forcing her to make constant adjustments to her direction, which compromises her stability and comfort. The narrow passage, combined with the need to avoid these elements, increases the risk of collisions and makes access to the establishment more difficult, heightening her sense of insecurity and dissuading her from visiting the location.

58.1.3. At the nearest intersection to Green Bites, Mrs. Dalia Vásquez is aware that the sidewalk lacks an access ramp, despite a pronounced level difference at the corner. The absence of a ramp prevents her from passing through seamlessly and without barriers, forcing her to seek alternative routes that are longer and less safe. This condition not only limits her autonomy but also creates an obstacle that hinders her smooth and direct access to the establishment, reinforcing her perception that the environment is not designed to ensure safe mobility. This barrier makes her feel dissuaded from visiting Green Bites, as her access is hindered from the journey itself to reaching the location.

58.1.4. The Municipality has a clear and direct responsibility to ensure that public infrastructure is accessible and safe; inadequate conditions such as uneven surfaces, cracks, sinkholes, and the lack of an access ramp are a reflection of negligence in the maintenance of public spaces. Despite being fully aware of these barriers, the Municipality has not taken the necessary steps to correct them, demonstrating inaction that perpetuates discrimination. By failing to intervene, the Municipality is excluding Mrs. Dalia from an accessible urban environment, reinforcing inequality and limiting her autonomy as she faces difficulties in moving independently. This lack of action not only fails to fulfill the obligation to ensure Mrs. Dalia's safety and well-being, but also maintains

and exacerbates her exclusion, as she is unable to access the space safely and adequately.

- 58.2. Main Entrance Without an Accessible Ramp: Mrs. Dalia Vásquez is aware that the main entrance of Green Bites lacks an accessible ramp, despite the presence of a significant level difference at the entrance. The absence of a ramp creates an architectural barrier that prevents a smooth and safe entry, limiting her autonomy and making access to the establishment difficult. The lack of a leveled path forces her to rely entirely on external assistance to overcome this obstacle, which compromises her independence and creates an uncomfortable and inaccessible experience. This condition restricts her ability to make independent decisions and move freely, making the establishment neither welcoming nor functional for her needs. The difficulty of entry and the lack of proper infrastructure make her feel dissuaded from visiting the location.
- 58.3. Inaccessible Tables and Chairs: Mrs. Dalia is fully aware that the furniture at Green Bites is not arranged in an accessible manner, as the available tables and chairs are at an inadequate height for her to use comfortably and safely. Due to her wheelchair, Mrs. Dalia cannot position herself properly at the table, making it difficult for her to reach items without unnecessary effort. The lack of adapted tables severely affects her comfort, as she is forced to make strained movements that are not only uncomfortable but also increase the risk of falls or injuries. The need to rely on others for basic activities, such as consuming her meal, causes significant frustration, making her feel excluded and discouraged from returning to the restaurant. The lack of inclusive options reinforces her feeling of not being welcomed or having a space designed for her needs.

- 58.4. Reduced Circulation Space: Mrs. Dalia is well aware that the circulation space inside Green Bites is significantly reduced due to the arrangement of furniture and objects. The narrow pathways make it difficult for her to move safely and without obstacles, forcing her to make constant adjustments in her direction, which increases the physical effort required to move. This lack of adequate space also jeopardizes her stability, as she has to maneuver in cramped spaces, creating tension and anxiety from not being able to move freely. This obstacle makes her feel that the environment is not designed for her, and discourages her from visiting, as every movement within the restaurant becomes an unnecessary physical challenge.
- 58.5. High Counters: Mrs. Dalia is fully aware that the counters at Green Bites are too high, creating a significant barrier for her. Relying on her wheelchair, she cannot interact comfortably with the staff or place orders and receive information independently. This excessive height prevents her from carrying out these interactions naturally, forcing her to depend on others to complete simple tasks like placing an order or receiving her meal, which makes her feel vulnerable and frustrated. The lack of accessible counters reinforces her sense of exclusion, as Mrs. Dalia cannot enjoy the same autonomy as other customers, severely affecting her experience at the establishment and discouraging her from returning.
- 58.6. Counters Without Front Clearance: Mrs. Dalia is aware that the counters at Green Bites lack adequate front clearance, preventing her from positioning herself comfortably and aligning properly with the surface to interact with the staff. Without the necessary space to approach the counter, she is forced to stretch beyond her natural reach, which creates considerable physical discomfort and increases the risk of falls or injuries. This situation not only makes everyday interactions difficult but also makes her feel neglected and discouraged from continuing to engage with the establishment.

The lack of proper front clearance creates an additional barrier, reinforcing the feeling of exclusion and discouraging her from returning, as it prevents her from participating autonomously and comfortably in the restaurant experience.

- 58.7. To ensure accessibility and improve Mrs. Dalia Vásquez's experience at Green Bites, it is essential to implement solutions that eliminate the barriers that currently hinder her mobility and autonomy. The lack of a ramp at the main entrance represents an architectural barrier that limits her autonomy and forces her to rely on external assistance to enter the establishment. To resolve this, the construction of a properly inclined ramp equipped with handrails and a non-slip surface is recommended, providing her with the stability and safety needed to enter and exit comfortably. Inside the establishment, the arrangement of objects and furniture reduces circulation space, making it difficult for her to move and requiring constant maneuvering to navigate safely. Reorganizing the furniture would help widen the pathways and clear the transit areas, facilitating her movement without compromising her stability or comfort. Another significant barrier is the height of the tables and chairs within the establishment. Currently, the lack of accessible furniture prevents her from positioning herself stably and aligning with the surface, making it difficult for her to reach objects on the table without excessive effort. To improve this situation, it is recommended to incorporate tables with an appropriate height and free space underneath, allowing her to position herself comfortably without the need for constant adjustments or additional assistance. Regarding the counters, their excessive height represents an obstacle that makes it difficult for her to interact with staff, place orders, and receive her purchase without assistance. To address this, an accessible section with a lower height should be installed, allowing her to complete these actions independently and without difficulty. Additionally, the lack of adequate front clearance at the counters prevents her from

positioning herself properly, forcing her to stretch beyond her natural reach to complete a transaction. To remove this barrier, a front space free of obstacles should be enabled, ensuring she can approach comfortably and without additional effort. If these barriers are removed, Mrs. Dalia Vásquez would no longer feel dissuaded from visiting Green Bites. With an accessible, safe, and comfortable environment, her experience at the establishment would be positive, allowing her to move independently and without difficulties. These improvements would ensure that she can access the establishment without limitations, interact with the staff easily, and enjoy her time there without obstacles, demonstrating a genuine commitment to inclusion and respect for her right to accessibility.

**Responsibility of the Municipality of Dorado and Blooming Cup Corporación
Blooming Cup**

59. Mrs. Dalia Vásquez feels drawn to the culinary offerings at Blooming Cup, as she finds its menu particularly appealing. Among the options, the Salmón Bites, with its crispy breading paired with tartar sauce, especially catches her attention, as do the Tostadas con Mantequilla, which evoke a comforting and simple yet flavorful choice. Additionally, their distinctive Matcha piques her interest as a beverage that perfectly complements her selection, offering a balanced experience between freshness and indulgence. However, since December, 2024 she is aware that both the sidewalk in front of the establishment, located at 311 Méndez Vigo Rd, Dorado, PR 00646-0000, with coordinates 18.459796388787026, -66.26391630768869, and the interior of the venue present architectural barriers that compromise the accessibility of the space. As a person with reduced mobility, the presence of infrastructure irregularities directly affects her experience, making it difficult for her to access and remain comfortably in the establishment. The lack of proper conditions to ensure safe and comfortable movement makes her feel dissuaded from visiting the establishment, as her autonomy and well-being are compromised.

60. Mrs. Dalia intends to visit Blooming Cup during the next three months to enjoy its culinary options, but especially to enjoy the Salmón Bites. However, she is discouraged by the continued presence of accessibility barriers that hinder her movement and autonomy. Despite her interest in enjoying the flavors of the menu and the unique experience the establishment offers, the access difficulties both on the sidewalk and inside the venue prevent her from having a safe and comfortable visit. The lack of adequate conditions for her mobility makes her feel discouraged from returning, as her well-being and autonomy are compromised. The barriers that Mrs. Dalia is aware are:

60.1. Inaccessible Sidewalk: Mrs. Dalia Vásquez faces accessibility barriers in front of Blooming Cup due to a narrow, poorly maintained sidewalk filled with cracks and uneven surfaces. The lack of space makes it difficult for her to maneuver her assistive device safely, forcing constant adjustments and increasing the risk of losing balance.

60.1.1. Narrow Sidewalk: Mrs. Dalia Vásquez is aware that the sidewalk in front of Blooming Cup is too narrow, making it difficult for her to move safely and without obstacles. The limited space prevents her from maneuvering easily, forcing her to make constant adjustments in her direction to avoid collisions with urban furniture or other pedestrians. The lack of adequate width compromises her stability and control over her assistive device, increasing the effort required to move forward without interruptions. This situation affects her experience, as it restricts her ability to move smoothly and independently from the moment she arrives at the establishment, which makes her feel dissuaded from visiting the location, since she does not have an accessible and unobstructed path.

60.1.2. Additionally, Mrs. Dalia Vásquez is aware that the sidewalk in front of Blooming Cup is in poor condition, featuring cracks, uneven surfaces, and

visible signs of wear due to lack of maintenance. These conditions create an unstable path that affects her mobility, increasing the risk of abrupt movements in her assistive device and compromising her safety. The irregular pavement makes it difficult for her to maintain control and stability, forcing her to put in extra effort to avoid losing balance or getting stuck in surface imperfections. The lack of a smooth and well-maintained surface affects her experience, as it turns her journey to the establishment into a constant challenge, which makes her feel dissuaded from visiting the location, since her mobility is not guaranteed safely from the moment she arrives.

- 60.1.3. The Municipality has a clear responsibility for maintaining and adapting public infrastructure to ensure safety and accessibility. The narrowness and poor condition of the pavement, with cracks and uneven surfaces, reflect the lack of maintenance and adjustment to guarantee a safe and comfortable passage for Mrs. Dalia. Despite the Municipality being fully aware of these deficiencies, it has not taken the necessary steps to correct them, demonstrating inaction that perpetuates discrimination against Mrs. Dalia. By failing to intervene, the Municipality is preventing Mrs. Dalia from accessing the establishment autonomously and safely, excluding her from an accessible environment. This lack of action reinforces inequality, as Mrs. Dalia can't enjoy her right to independent mobility due to the lack of proper infrastructure, which exacerbates the discrimination against her and limits her well-being.
- 60.2. Narrow Main Entrance: Mrs. Dalia Vásquez is aware that the main entrance of Blooming Cup is narrow, which compromises her safe and comfortable access to the establishment. The reduced width of the entrance limits her mobility and makes it difficult for her to enter without obstacles, forcing her to make additional maneuvers

that affect her stability and control over her assistive device. The lack of a properly sized entrance restricts her autonomy when accessing the establishment, creating an uncomfortable and unsafe experience. This situation makes her feel dissuaded from visiting the establishment, as her entry is not guaranteed to be smooth and unrestricted.

- 60.3. High Counters: Mrs. Dalia Vásquez is aware that the counters inside Blooming Cup are too high, making it difficult for her to interact with staff and access the products and services offered at the establishment. The elevated surface prevents her from placing orders, making payments, or receiving her purchase independently, forcing her to rely on external assistance for basic actions. The lack of an accessible surface compromises her comfort and independence when using the counter, negatively impacting her experience inside the venue. This barrier makes her feel dissuaded from visiting the establishment, as she cannot move and interact easily in the customer service area.
- 60.4. Counters Without Front Clearance: Mrs. Dalia Vásquez is aware that the counters at Blooming Cup lack adequate front clearance, preventing her from approaching properly and aligning comfortably with the surface. The absence of a clear area in front of the counter forces her to stretch beyond her natural reach or adopt uncomfortable positions to complete a transaction, resulting in an inaccessible experience. The lack of adequate conditions to ensure her comfort and autonomy makes her feel dissuaded from visiting the establishment, as her mobility needs are not accommodated in the customer service space.
- 60.5. Reduced Circulation Space: Mrs. Dalia Vásquez is aware that the arrangement of objects and furniture inside Blooming Cup limits circulation space, restricting her mobility and making it difficult for her to move around the establishment. The current

layout creates narrow pathways and reduced areas where navigating becomes challenging, forcing her to make constant adjustments in her direction to move forward without colliding with obstacles. The lack of sufficiently wide movement areas affects her experience, as any movement inside the establishment requires additional effort and precise maneuvers that compromise her stability and comfort. The presence of elements that obstruct the natural flow of mobility within the venue makes her feel dissuaded from visiting the establishment, as moving safely and without interruptions is not guaranteed.

- 60.6. To ensure safe and comfortable access for Mrs. Dalia Vásquez, Blooming Cup can implement various solutions to eliminate the architectural barriers. Installing a section at an appropriate height would allow Mrs. Dalia Vásquez to place orders, make payments, and receive her purchase independently, without the need for additional assistance. Additionally, it is necessary to enable a front clearance space at the counters, ensuring that she can approach without restrictions and align comfortably with the surface without having to adopt uncomfortable positions or exert unnecessary physical effort. Inside the venue, the arrangement of furniture and objects should be reorganized to optimize circulation space. Expanding the pathways and clearing transit areas would ensure that Mrs. Dalia Vásquez can move freely without interruptions, avoiding constant maneuvers that affect her stability. A more accessible layout would not only facilitate her mobility within the establishment but also allow her to enjoy a more comfortable and autonomous experience. If these barriers are removed, Mrs. Dalia Vásquez no longer feels dissuaded from visiting Blooming Cup. An accessible and safe environment would allow her to enter without difficulties, interact with staff independently, and move comfortably within the establishment. These improvements

reflect a genuine commitment to inclusion and ensure that her experience at the venue is fully accessible.

Responsibility of the Municipality of Dorado and Dipea Wings LLC
Dipea Wings

61. Mrs. Dalia Vásquez is drawn to the culinary offerings at Dipea Wings, as she finds its menu options appealing and promising a unique flavor experience. The variety of wings with different sauces and sides particularly catches her attention, offering her the opportunity to enjoy combinations that suit her preferences. Additionally, the restaurant's atmosphere appears to provide a cozy and pleasant space to enjoy a satisfying meal. However, since February, 2025 she is aware that the sidewalk in front of the restaurant, located at 403 Street Méndez Vigo, Dorado, PR 00646-4824, with coordinates 18.461490657913927, -66.26986537404571 , as well as the interior of the venue, presents architectural barriers that hinder her access and mobility. The presence of infrastructure irregularities affects her experience, as it compromises her safety and comfort from the moment she approaches the location, which makes her feel dissuaded from visiting the establishment.
62. Mrs. Dalia intends to visit Dipea Wings during the next three months to enjoy its food, especially wings with different sauces and sides that she loves. However, she is discouraged by the continued presence of accessibility barriers that hinder her movement and autonomy. Despite her interest in enjoying the flavors of the menu and the cozy atmosphere of the restaurant, the access difficulties both on the sidewalk and inside the venue prevent her from having a safe and comfortable visit. The lack of adequate conditions for her mobility makes her feel discouraged from returning, as her well-being and autonomy are compromised. The barriers that Mrs. Dalia is aware of are:
 - 62.1. Sidewalk Obstructed: Mrs. Dalia Vásquez is aware that the sidewalk in front of Dipea Wings is obstructed by elements such as chairs and tables, making it difficult for her to pass through safely and without interruptions. The presence of furniture in the

pedestrian area significantly reduces the available space for her mobility, forcing her to make constant maneuvers to avoid these obstacles. This situation compromises her stability and control over her assistive device, increasing the effort required to move and creating an uncomfortable experience. The partial blockage of the sidewalk affects her experience, as it limits her ability to move freely and without hindrances from the moment she arrives at the establishment. The lack of a clear and accessible path makes her feel dissuaded from visiting the location, as she does not have a safe route that guarantees unobstructed access.

- 62.1.1. The Municipality has a direct responsibility to ensure accessibility and safety in public infrastructure, especially on sidewalks. The Municipality is fully aware of these deficiencies, but despite this, it has taken no action to correct them, demonstrating inaction that perpetuates discrimination against Mrs. Dalia. By failing to intervene, the Municipality is excluding Mrs. Dalia from an accessible environment, preventing her from accessing the establishment safely. This lack of action not only reinforces inequality but also limits her autonomy and well-being, exacerbating the discrimination she faces and perpetuating her exclusion from public spaces.
- 62.2. Inaccessible Entrance: Mrs. Dalia Vásquez is aware that the entrance to Dipea Wings does not have an accessible ramp or an alternative route that would allow her to reach the second level where the business is located, making autonomous access impossible. The absence of adapted infrastructure creates an architectural barrier that completely prevents her from accessing the establishment independently, forcing her to rely on external assistance or give up visiting the place. This lack of accessible options creates significant frustration, as Mrs. Dalia is forced to abandon her attempt to enjoy the venue, reinforcing her sense of exclusion. The lack of a ramp or accessible

mechanism, such as an elevator or a stair lift platform, affects her experience, as it prevents her from enjoying the services of the establishment on equal terms. The inability to access the establishment independently leaves her feeling discouraged and marginalized, as her autonomy and right to mobility are not guaranteed.

62.3. Inaccessible Chairs: Mrs. Dalia Vásquez is aware that the chairs at Dipea Wings are too high, making it impossible for her to use them comfortably and safely. Relying on her wheelchair, Mrs. Dalia cannot position herself properly in the chair to enjoy her meal, forcing her to make strained and unnatural movements. The height of the furniture prevents her from aligning properly with the table and positioning herself stably to eat. This not only increases her discomfort but also puts her stability and safety at risk, as she must make unnecessary efforts to reach her food. The lack of accessible seating options compromises her comfort and limits her ability to enjoy the establishment without restrictions. The lack of adapted chairs causes Mrs. Dalia to feel excluded from the social atmosphere of the restaurant, as she cannot enjoy her time in the place as other customers do. The absence of inclusive furniture reinforces the feeling of discrimination against her, as she doesn't have the same comfort options as other customers, making her feel discouraged from visiting the establishment.

62.4. Inaccessible Tables: Mrs. Dalia Vásquez is aware that the tables at Dipea Wings have a support bar at the bottom, which limits her ability to approach the surface comfortably. The support bar blocks the necessary space for her wheelchair, forcing her to maintain an uncomfortable posture, which causes her physical pain and muscle tension. The structure of these tables obstructs the necessary space for her assistive device to be positioned correctly, forcing her to maintain an uncomfortable posture or sit too far from the table. This not only causes her discomfort but also increases physical fatigue, as Mrs. Dalia must make constant efforts to remain stable. The lack

of tables with an accessible design affects her experience, as it prevents her from enjoying her meal without difficulty or additional effort. The inability to position herself properly at the restaurant's furniture reinforces her feeling of exclusion and frustration, as she cannot enjoy the space independently. The lack of accessible tables makes her feel discouraged from visiting the establishment, as her comfort and mobility are not guaranteed.

62.5. High Counters: Mrs. Dalia Vásquez is fully aware that the counters at Dipea Wings are too high, which creates a significant barrier for her. Relying on her wheelchair, Mrs. Dalia cannot interact comfortably with the staff or place orders and receive information independently. This excessive height prevents her from carrying out these interactions naturally, forcing her to depend on others to complete simple tasks like placing an order or receiving her meal, which makes her feel vulnerable, frustrated, and discouraged. The lack of accessible counters reinforces her sense of exclusion, as Mrs. Dalia cannot enjoy the same autonomy as other customers, severely affecting her experience at the establishment. The constant need to depend on others for basic interactions reduces her satisfaction significantly, making her feel like a secondary visitor, which reinforces the discrimination against her and discourages her from returning.

62.6. Counters Without Front Clearance: Mrs. Dalia Vásquez is aware that the counters at Dipea Wings lack adequate front clearance, preventing her from positioning herself comfortably and aligning properly with the surface to complete transactions without obstacles. The lack of adequate space to approach the counter forces her to stretch beyond her natural reach, which creates considerable physical discomfort and increases the risk of falls or injuries. The absence of a clear area in front of the counter forces her to adopt uncomfortable postures to complete an interaction, creating an

inaccessible experience. This situation not only causes her discomfort but also reinforces her sense of exclusion, as Mrs. Dalia cannot interact on equal terms with other customers. The lack of proper conditions to ensure her comfort and autonomy affects her experience, as it compromises her ability to interact without unnecessary effort. The difficulty in positioning herself properly at the customer service area makes her feel discouraged from interacting with the establishment, as there is no space adapted to her mobility needs.

62.7. Route to the Counters Obstructed: Mrs. Dalia Vásquez is aware that the route to the counters at Dipea Wings is obstructed, making it difficult for her to move and access the customer service area. The presence of furniture, objects, or structural elements along the path significantly reduces the available space for her mobility, forcing her to make constant maneuvers to move forward. This situation compromises her stability and increases the effort required to reach the ordering area safely. Each additional obstruction on her path makes her feel more uncomfortable and frustrated, as she cannot move freely within the establishment. The lack of a clear and accessible pathway affects her experience, as it prevents her from moving smoothly and independently within the establishment. The difficulty in accessing the counters without obstacles makes her feel discouraged from visiting the establishment, as her movement within the restaurant is not guaranteed in a comfortable and safe manner.

62.8. Reduced Circulation Space: Mrs. Dalia Vásquez is aware that the circulation space inside Dipea Wings is limited due to the arrangement of objects and furniture, which restricts her mobility and makes it difficult for her to move freely within the establishment. The current layout of the furniture creates narrow pathways and reduced areas where her movement is compromised, forcing her to make constant adjustments in her direction to avoid collisions with the surrounding elements. The

lack of a sufficiently wide movement area affects her experience, as any movement inside the establishment requires additional effort and precise maneuvers that compromise her stability and comfort. The lack of free space to move easily increases the risk of accidents and makes Mrs. Dalia feel more fatigued and frustrated. The presence of obstacles along her path makes her feel discouraged from visiting the establishment, as her mobility within the venue is not guaranteed in an accessible manner.

62.9. Carpets That Obstruct Circulation: Mrs. Dalia Vásquez is aware that the carpets inside Dipea Wings represent an obstacle to her mobility, making it difficult for her to move safely and without interruptions. The texture, thickness, and potential movement of the carpets can create resistance against her wheelchair, affecting her stability and control, making her feel insecure while moving. Additionally, the presence of raised edges or folds on the surface increases the risk of getting stuck or experiencing abrupt movements that compromise her safety. The lack of a uniform and obstacle-free floor affects her experience, as it prevents her from moving smoothly within the establishment and requires additional effort to maneuver safely. Simply having to traverse carpets that hinder her circulation reinforces her feeling of exclusion and makes her feel discouraged from visiting the establishment, as her mobility is not guaranteed in a comfortable and accessible manner.

62.10. To ensure safe and comfortable access for Mrs. Dalia Vásquez, Dipea Wings can implement various solutions to eliminate the architectural barriers. It is recommended to incorporate accessible chairs with an appropriate height, allowing Mrs. Dalia Vásquez to sit comfortably and stably. Likewise, tables with support bars at the bottom should be replaced or redesigned, ensuring that there is enough space for her assistive device to position correctly without obstructions. In the customer service area, the

counters should be adapted to an accessible height, allowing Mrs. Dalia Vásquez to place orders, make payments, and receive her purchase without requiring external assistance. Moreover, a front clearance space at the counters should be provided, ensuring that she can approach and align comfortably with the surface without needing to exert unnecessary effort or adopt uncomfortable postures. Inside the venue, it is essential to reorganize the layout of objects and furniture to widen the pathways and ensure uninterrupted transit. The removal of barriers in the route to the counters is key to allowing Mrs. Dalia Vásquez to access the service area without having to make constant maneuvers or face difficulties that compromise her stability. Additionally, to improve circulation, it is recommended to remove carpets that obstruct movement or ensure they are thin and securely attached to the floor, preventing folds or raised edges that could cause her assistive device to get stuck or make abrupt movements. If these barriers are removed, Mrs. Dalia Vásquez no longer feels dissuaded from visiting Dipea Wings. An accessible and safe environment would allow her to enter without difficulties, interact with staff independently, and move comfortably within the establishment. These improvements would reflect a genuine commitment to inclusion and ensure that her experience at the venue is fully accessible.

63. Mrs. Dalia Vásquez will be adversely affected in the future by the barriers present at the public accommodations identified in this Complaint, because:
 - 63.1. Many of the co-defendant public accommodations mentioned in this Complaint are located within the Municipality of Dorado, where Mrs. Vásquez resides. Given her proximity to these locations, they form part of her regular environment and are places she would naturally visit if they were accessible.
 - 63.2. Mrs. Vásquez enjoys exploring and experiencing new places, particularly restaurants, local businesses, and recreational spaces. These visits are not only part of her routine

but also contribute significantly to her quality of life by allowing her to remain active, engaged with her community, and enjoy leisure activities that help her cope with the challenges of her disability.

63.3. One of Mrs. Vázquez's favorite activities is discovering new restaurants, businesses, shopping centers, and entertainment spaces where she can enjoy social interactions and relaxation. Her desire to continue engaging in these activities reinforces her intent to return to the locations listed in this Complaint once they become accessible. Additionally, she plans to return in the coming months as soon as these places are made accessible.

63.4. As a resident and active member of her community, Mrs. Vázquez seeks to exercise her right to free mobility. Being able to move without obstructions is essential for her to perform everyday activities, such as grocery shopping, attending medical appointments, and enjoying recreational outings—activities that should not be limited by the presence of unlawful accessibility barriers.

64. Mrs. Vázquez fully intends to return to the co-defendant public accommodations once the architectural barriers have been removed. However, until all barriers affecting her type of disability are eliminated, she remains dissuaded from visiting these establishments. She will only be able to fully and equally access these locations in a dignified and safe manner when these violations are corrected.

65. The plaintiff reserves the right to return to the public accommodations named in this Complaint at any time and for any lawful purpose, even if doing so requires enduring discriminatory conditions, experiencing inconveniences that non-disabled individuals do not face, or exposing herself to risks to her personal safety and physical integrity. Just as a non-disabled person may choose to tolerate hostile but lawful conditions—such as a long checkout line—Mrs. Vázquez may also attempt to visit these locations despite the illegal

discriminatory conditions created by the defendants, regardless of the impact on her dignity or the potential harm to her physical well-being.

D. The Failure of the Municipality of Dorado and the Commonwealth of Puerto Rico to Ensure Accessibility in Public Spaces

66. The Commonwealth of Puerto Rico and the Municipality of Dorado have continuously failed to address the accessibility barriers that prevent Mrs. Dalia Vázquez from moving safely and independently within her community. The sidewalks and curb ramps along State Highway #693, as well as other streets indicated in the Complaint and those adjacent to the co-defendant establishments, are in severe disrepair. These essential pathways, which should be accessible to individuals with disabilities, instead have cracks, uneven surfaces, obstructions caused by illegally parked vehicles, and overgrown vegetation, making it nearly impossible for Mrs. Vázquez to navigate them using her motorized wheelchair. Additionally, the lack of proper landing areas and the unsafe transitions between curb ramps and the roadway further obstruct her movement, often forcing her to resort to dangerous alternatives just to reach her destination.
67. Despite their responsibility to ensure accessibility, both the Commonwealth of Puerto Rico and the Municipality of Dorado have failed to enforce proper maintenance and compliance with the Americans with Disabilities Act (ADA) and other applicable accessibility standards. Their inaction has not only rendered public sidewalks along State Highway #693 and other streets in the area inaccessible but has also significantly obstructed Mrs. Dalia Vázquez's ability to navigate her community safely and independently, forcing her to avoid entire areas due to their hazardous conditions.
68. The Commonwealth of Puerto Rico and the Municipality of Dorado have also failed to regulate parking violations, allowing vehicles to obstruct curb ramps and pedestrian pathways, further limiting Mrs. Dalia Vázquez's ability to move freely and safely. Despite the clear need to implement and enforce parking restrictions, local authorities have neglected to

install proper signage, impose penalties, or take corrective measures to prevent illegal parking in these critical areas. As a result, Mrs. Vázquez often finds herself unable to access businesses, sidewalks, and public spaces, forcing her to alter her plans, take unsafe routes, or abandon visits altogether.

69. This pattern of inaction extends beyond sidewalks and parking areas to the co-defendant establishments identified in this Complaint, which Mrs. Dalia Vázquez has considered visiting. Many of these businesses fail to provide accessible entry routes, as they are surrounded by damaged sidewalks, narrow pathways, and improperly designed curb ramps, all of which create dangerous conditions for individuals with mobility impairments. The Commonwealth of Puerto Rico and the Municipality of Dorado have long been aware of these conditions but have neglected to require businesses to comply with accessibility laws. This lack of enforcement has allowed these businesses to continue operating without ensuring safe and accessible entry for individuals like Mrs. Vázquez.
70. By knowingly allowing these barriers to persist, the Commonwealth of Puerto Rico and the Municipality of Dorado have systematically denied Mrs. Dalia Vázquez equal access to public spaces. Their failure to maintain sidewalks, regulate parking, and enforce accessibility standards at the co-defendant establishments demonstrates a blatant disregard for the rights and safety of individuals with disabilities. As a result, Mrs. Vázquez is frequently forced to navigate unsafe conditions or refrain from visiting places she would otherwise enjoy, effectively excluding her from fully participating in her own community.
71. The Commonwealth's and the Municipality's continued inaction constitutes a failure to fulfill their legal obligation to ensure accessibility, leaving Mrs. Dalia Vázquez and others with mobility disabilities at a constant and unjust disadvantage.

E. Violations of Title III of the Americans with Disabilities Act (ADA) by Places of Public Accommodation

72. The co-defendants identified in this Complaint as operators of places of public accommodation are subject to the requirements of Title III of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12181 et seq., which mandates ensuring accessibility and equitable participation for individuals with disabilities in their facilities. Despite this legal obligation, these businesses, with the tacit approval of the Commonwealth of Puerto Rico and the Municipality of Dorado, continue to operate in violation of the ADA by failing to provide safe and accessible entry to their establishments.
73. The co-defendants have failed to comply with the ADA by maintaining architectural barriers that prevent Mrs. Dalia Vázquez and other individuals with mobility impairments from freely accessing their facilities. These violations include, but are not limited to:
- 73.1. Lack of properly designated accessible parking spaces, including van-accessible spaces, failing to meet ADA parking standards.
 - 73.2. Absence of clear signage for accessible parking, allowing unauthorized vehicles to occupy these spaces, further restricting access.
 - 73.3. Failure to provide an accessible route from the parking lot to the main entrance, forcing individuals with disabilities to navigate unsafe or non-designated paths.
 - 73.4. Excessively high service counters, restricting Mrs. Vázquez's ability to interact with staff or complete transactions independently due to her reliance on a motorized wheelchair.
 - 73.5. Obstructed pathways inside and outside the establishments, including narrow aisles, improperly placed furniture, and obstacles such as trash bins, further limiting accessibility.
74. The lack of enforcement by the Commonwealth of Puerto Rico and the Municipality of Dorado has resulted in the creation of widespread architectural barriers that severely impact individuals with mobility impairments, including Mrs. Dalia Vázquez, who is often forced to

navigate unsafe conditions, alter her plans, or avoid these businesses altogether. As a result, she is deprived of the ability to access essential goods and services available to the general public, reinforcing her exclusion from spaces that should be accessible to all individuals, regardless of their mobility limitations.

F. Violations of Title II of the Americans with Disabilities Act (ADA) by the Municipality of Dorado and the Commonwealth of Puerto Rico

75. The Commonwealth of Puerto Rico and the Municipality of Dorado have an affirmative legal duty to ensure that public sidewalks, curb ramps, and pedestrian pathways within their jurisdiction comply with accessibility requirements and remain free from barriers that obstruct individuals with mobility impairments. However, both entities have systematically failed to fulfill this obligation, thereby creating an environment that is unsafe, exclusionary, and discriminatory for individuals with disabilities, such as Mrs. Dalia Vázquez.
76. The Commonwealth of Puerto Rico and the Municipality of Dorado bear direct responsibility for the ongoing maintenance, repair, and regulation of sidewalks and curb ramps throughout the municipality, including those surrounding the co-defendant establishments identified in this Complaint, which Mrs. Dalia Vázquez has considered visiting. This responsibility extends to ensuring that pedestrian pathways are maintained in an accessible condition, free from hazardous defects, and that they meet the standards outlined in the 2023 Public Right-of-Way Accessibility Guidelines (PROWAG).
77. Despite this legal obligation, the Commonwealth of Puerto Rico and the Municipality of Dorado have allowed public sidewalks and curb 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. Additionally, both entities have failed to regulate illegal parking practices, resulting in vehicles obstructing curb ramps and pedestrian pathways, further restricting Mrs. Dalia Vázquez's ability to navigate these areas independently and safely.

78. The lack of enforcement and corrective action by the Commonwealth of Puerto Rico and the Municipality of Dorado has subjected Mrs. Dalia Vázquez to serious risks to her personal safety, dignity, and mobility. Due to the pervasive inaccessibility of sidewalks, she is frequently forced to take dangerous, unregulated detours, including moving onto the street, where she is directly exposed to vehicular traffic. This places her in immediate danger of being struck by moving vehicles and causes significant physical and emotional distress. Furthermore, the inconsistent and unsafe pedestrian routes prevent her from fully participating in daily activities, such as attending medical appointments, shopping, or engaging in recreational outings.
79. The sidewalk system surrounding the co-defendant establishments serves as an essential pedestrian route for Mrs. Dalia Vázquez and other individuals with disabilities. However, due to the combined negligence of the Commonwealth of Puerto Rico, the Municipality of Dorado, and the co-defendants, this route is entirely unreliable and unsafe. The Municipality's inaction has severely compromised connectivity and pedestrian flow, creating insurmountable obstacles for individuals who rely on mobility aids.
80. By allowing these barriers to persist, the Commonwealth of Puerto Rico and the Municipality of Dorado are in systematic violation of Title II of the 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 curb ramps constitute a core governmental responsibility under Title II. Therefore, the Commonwealth's and the Municipality's failure to implement and enforce accessibility regulations constitutes discrimination in a pattern and practice of exclusion, depriving Mrs. Dalia Vázquez and others with mobility disabilities of their right to full and equal access to public spaces.

G. Violation of Section 504 of the Rehabilitation Act by the Commonwealth of Puerto Rico and the Municipality of Dorado

81. 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 Commonwealth of Puerto Rico and the Municipality of Dorado are legally obligated 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, curb ramps, and pedestrian pathways.
82. Despite this clear legal obligation, the Commonwealth of Puerto Rico and the Municipality of Dorado have engaged in systemic discrimination by failing to take affirmative actions to remove architectural barriers from their pedestrian infrastructure and by allowing sidewalks to be blocked by illegally parked vehicles. The continued inaction and failure to enforce accessibility regulations by both entities have directly resulted in the exclusion of Mrs. Dalia Vázquez from a fundamental public service—safe and accessible pedestrian pathways.
83. This failure constitutes a clear violation of Section 504 and reflects intentional discrimination against Mrs. Dalia Vázquez based on her disability. The Commonwealth of Puerto Rico and the Municipality of Dorado have been fully aware of the hazardous conditions of their sidewalks and curb ramps, including broken pavement, missing landing areas, potholes, cracks, and abrupt level changes, yet have chosen not to take corrective measures. Additionally, they have failed to implement parking enforcement policies, allowing vehicles to illegally obstruct designated pedestrian access points, curb ramps, and sidewalks, further restricting Mrs. Vázquez’s ability to navigate her community safely.
84. By allowing these barriers to persist, the Commonwealth of Puerto Rico and the Municipality of Dorado have effectively denied Mrs. Dalia Vázquez the use and enjoyment of public spaces, in direct violation of Section 504. Their failure to ensure compliance with federal accessibility standards has forced Mrs. Vázquez to either risk injury by navigating hazardous

pedestrian routes or remain confined to her home, thereby depriving her of her right to participate in everyday community life on equal terms with others.

H. Use Permits Granted in Violation of Accessibility Laws

85. The Municipality of Dorado has systematically granted and maintained use permits for the co-defendants identified in this Complaint, despite their failure to comply with accessibility laws. As a result, these businesses have been allowed to operate despite the existence of significant architectural barriers that prevent individuals with disabilities, such as Mrs. Dalia Vázquez, 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, leading to the continued operation of establishments that do not meet the legal standards for accessibility.
86. Specifically, the co-defendants 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:
 - 86.1. In their use permit applications before the Municipality of Dorado, the co-defendants falsely asserted that their establishments complied with accessibility laws, when in reality, the actual conditions of their facilities demonstrate otherwise.
 - 86.2. The co-defendants fraudulently certified that their establishments had accessible entrances and routes, yet they maintain permanent obstacles that prevent individuals with disabilities from safely accessing them.
 - 86.3. In their permit applications, the co-defendants 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 Mrs. Dalia Vázquez to move freely.

- 86.4. The co-defendants 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 Mrs. Dalia Vázquez.
- 86.5. 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 place obstacles such as trash bins that further limit accessibility for individuals like Mrs. Dalia Vázquez.
- 86.6. The co-defendants failed to disclose that they use public sidewalks as parking areas, completely eliminating accessible pedestrian routes and forcing individuals with disabilities to move onto the roadway, thereby placing them in direct danger.
- 86.7. The co-defendants misrepresented compliance with accessible parking requirements, failing to provide the correct number of accessible spaces, failing to designate van-accessible spaces, and neglecting to install proper signage and markings, creating additional barriers that prevent safe and independent access for individuals like Mrs. Dalia Vázquez.
- 86.8. The Municipality of Dorado has granted use permits without conducting proper inspections to verify compliance with accessibility laws, allowing the co-defendants to continue operating despite their failure to provide accessible entrances, paths of travel, parking, and service areas.
87. The Municipality of Dorado has demonstrated a pattern of negligence in its duty to enforce accessibility laws. Rather than ensuring that the co-defendants comply with the law before issuing permits, the Municipality has:
 - 87.1. Failed to conduct adequate inspections before granting use permits, allowing businesses with clear accessibility violations to continue operating.

- 87.2. Ignored the poor condition of public sidewalks, curb ramps, and access routes, further exacerbating the mobility barriers faced by Mrs. Dalia Vázquez and others with disabilities.
- 87.3. 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.
88. Not only has the Municipality of Dorado granted use permits to the co-defendants identified in this Complaint 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 use public sidewalks as parking spaces, obstruct accessible routes, and operate with significant architectural barriers, yet it has chosen not to take action to address these issues.
89. The number of enforcement actions or fines issued for violations related to sidewalk obstruction and accessibility barriers 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 has prioritized the convenience of businesses and drivers, allowing the continued misuse of public spaces at the expense of accessibility. This has led to severe consequences for individuals like Mrs. Dalia Vázquez, who faces immense difficulties in navigating these areas safely.
90. The failure of the Municipality of Dorado to regulate sidewalk use has resulted in public pedestrian spaces being misused as parking areas. As a consequence, Mrs. Dalia Vázquez has been forced to move onto the roadway, exposing herself to unnecessary danger and increasing her risk of falls or collisions with vehicles. Instead of implementing measures to keep sidewalks clear and accessible for pedestrians, the Municipality has either passively or

actively allowed these barriers to persist, creating an environment where accessibility is disregarded.

91. This ongoing failure to act constitutes a violation of Mrs. Dalia Vázquez's rights, as it directly impacts her freedom of movement, personal safety, and ability to participate in everyday activities. The lack of clear pedestrian routes and the obstruction of accessible pathways have made it physically exhausting and dangerous for her to navigate the city, discouraging her from visiting locations within Dorado due to the fear of encountering accessibility barriers that will make her visit impossible.
92. The co-defendants identified in this Complaint, including Interservice Group, Inc., Plaza Dorada, Inc., and other businesses operating within the Municipality of Dorado, 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 Mrs. Dalia Vázquez.
93. Despite operating parking facilities for their customers, the co-defendants have failed to comply with state and federal accessibility requirements, leading to the following violations:
 - 93.1. Failure to provide the required number of accessible parking spaces, including van-accessible spaces, as mandated by the Americans with Disabilities Act (ADA) and local regulations.
 - 93.2. Inadequate signage indicating accessible parking spaces, which results in unauthorized vehicles occupying these designated areas and further restricting access.
 - 93.3. Improperly designed or poorly located accessible parking spaces, making it difficult for individuals with mobility impairments to safely park and access the businesses.
 - 93.4. Failure to maintain proper markings for accessible parking, leading to confusion and further limiting access for individuals like Mrs. Dalia Vázquez.

- 93.5. Failure to ensure that accessible parking spaces are located near accessible entrances, forcing individuals with mobility impairments to navigate longer or unsafe routes to reach the entrances of these businesses.
94. Not only has the Municipality of Dorado 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 has neglected to:
 - 94.1. Conduct proper inspections to ensure compliance with accessibility laws before granting use permits.
 - 94.2. Impose corrective measures on businesses that fail to meet accessibility requirements.
 - 94.3. Enforce penalties or fines on establishments that continue to operate with inaccessible parking facilities.
 - 94.4. Address the poor condition of public sidewalks and curb ramps surrounding these businesses, which further exacerbate accessibility barriers for individuals like Mrs. Dalia Vázquez.
95. Due to these violations, Mrs. Dalia Vázquez has been directly impacted, as she has faced numerous obstacles when attempting to park and access these establishments. On several occasions, she has had to leave, attempt to return later, or seek an alternative location, leading to additional transportation costs, wasted time, and unnecessary financial burdens.
96. Furthermore, the lack of accessible parking and clear pedestrian routes has made each visit physically exhausting and frustrating, discouraging Mrs. Dalia Vázquez from returning to these locations. Instead of being able to enjoy her outings and participate in daily activities like any other citizen, she is forced to navigate an environment that continuously excludes individuals with disabilities.

97. The use permits granted to the co-defendants 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 Dorado failed in its duty to verify compliance before issuing permits.
98. 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 co-defendants' establishments. Additionally, the Commonwealth of Puerto Rico and the Municipality of Dorado 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 Mrs. Dalia Vázquez.
99. The evidence presented in this complaint reveals a pervasive, systematic pattern of discrimination against Mrs. Dalia Vázquez Aguiñaga, a quadriplegic resident of Dorado who uses a motorized wheelchair for mobility. This discrimination stems not from isolated oversights but from institutional neglect perpetuated by both public entities and private businesses, creating an environment where the most basic civil rights protections are routinely disregarded.
100. The Americans with Disabilities Act was enacted to provide "a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." Yet more than three decades after its passage, the landscape of Dorado reveals a disturbing reality where such discrimination remains entrenched and unchallenged. The violations documented throughout this complaint constitute a wholesale abdication of legal responsibilities by every defendant named herein.

101. The Commonwealth of Puerto Rico and the Municipality of Dorado have fundamentally failed in their obligations under Title II of the ADA and Section 504 of the Rehabilitation Act. The sidewalks along State Highway #693 and throughout Dorado—crumbling, obstructed, and often impassable for wheelchair users—stand as physical manifestations of these entities' disregard for their legal duties. Under 28 C.F.R. § 35.133, public entities are required to maintain accessible features in operable working condition, yet the conditions documented reveal severe neglect of this core obligation. The Supreme Court in *Tennessee v. Lane* recognized that Title II "seeks to enforce a variety of basic constitutional guarantees, including the right of access to the courts," which logically extends to access to all public services and spaces.
102. The issues identified in this complaint mirror those recently addressed in *Betancourt-Colón v. City of San Juan*, where the Department of Justice intervened to address widespread accessibility failures in San Juan's public sidewalk system. The Stipulated Order in that case, entered on June 23, 2023, established a comprehensive framework for remediation that recognized the municipality's obligation to address these barriers systematically. That Order required San Juan to retain a qualified Accessibility Consultant to conduct a thorough assessment of its public sidewalk system, implement a barrier reporting process, train municipal employees, and ensure that future construction and alterations comply with ADA standards. Most significantly, the Order required independent verification of compliance by Subject Matter Experts who must certify that all new construction, alterations, or repairs meet ADA Accessibility Standards through detailed documentation, including photographic evidence of measurements.
103. The parallels between the San Juan case and the current situation in Dorado are striking. In both municipalities, sidewalks are in severe disrepair, with broken pavement, inadequate curb ramps, and obstructions that make navigation impossible for wheelchair users. In both cases,

the municipalities have failed to implement systematic barrier identification and removal programs, despite their clear legal obligation to do so. And in both cases, these failures reflect not just technical non-compliance but fundamental indifference to the rights of citizens with disabilities to move freely through their communities.

104. The documented barriers in Dorado are not unique but part of a wider problem of inaccessibility across Puerto Rico. The Department of Justice's intervention in the San Juan case signals federal recognition of this systemic problem and establishes a precedent for addressing these violations throughout the Commonwealth. The remedial framework established in the San Juan Stipulated Order—including assessment by qualified consultants, mandatory training, and independent verification of compliance—provides a tested blueprint for the remedies sought in this case.
105. The Municipality of Dorado has compounded this discrimination through its permitting practices, granting and maintaining use permits for businesses that blatantly violate accessibility requirements. This practice contravenes not only the ADA but basic principles of administrative law, as permits issued based on false representations of accessibility compliance are legally void. The Municipality's failure to verify compliance before issuing permits or to implement enforcement mechanisms afterward reveals a systemic disregard for disability rights that permeates its operations.
106. The forty co-defendant businesses named in this complaint have likewise failed to meet their obligations under Title III of the ADA. The barriers documented—inaccessible entrances, narrow pathways, excessively high counters, tables that block wheelchair access, and restrooms that remain unusable for individuals with mobility impairments—are not minor inconveniences but fundamental barriers to equal participation in community life. As the Supreme Court noted in *PGA Tour, Inc. v. Martin*, the ADA was designed to provide "strong, consistent, enforceable standards addressing discrimination against individuals with

disabilities," yet the businesses in Dorado operate as if these standards were mere suggestions rather than legal imperatives.

107. The legal violations are not abstract but concrete, affecting Mrs. Vázquez's daily life in profound ways. Where sidewalks are broken or obstructed, she cannot safely travel. Where entrances have steps without ramps, she cannot enter. Where counters are too high, she cannot conduct transactions independently. Where tables have obstructive bases, she cannot dine comfortably. Where restrooms lack adequate space or grab bars, she cannot use them. Each barrier represents not just a technical violation of law but a tangible denial of her right to participate in community life with dignity and independence.
108. The San Juan Stipulated Order recognized that inaccessible sidewalks force individuals with mobility disabilities to travel on roadways alongside vehicular traffic, placing them at significant risk. Similarly, Mrs. Vázquez is often forced to navigate dangerous roadways due to inaccessible sidewalks in Dorado, facing the same perilous conditions that prompted federal intervention in San Juan. The requirement in the San Juan Order that all newly constructed or altered sidewalks and curb ramps be certified as compliant by qualified experts acknowledges the critical importance of these elements to ensuring safety and accessibility—a requirement equally necessary in Dorado.
109. The pattern of neglect documented in this complaint reveals not just ignorance of legal requirements but a more troubling indifference to the rights and needs of citizens with disabilities. The co-defendants' violations persist not because accessibility is technically impossible or prohibitively expensive, but because these entities have calculated—correctly, thus far—that they can disregard their legal obligations without consequence. This pattern of deliberate indifference heightens the gravity of the violations and underscores the need for robust judicial intervention.

110. The legal framework is clear: under Title II of the ADA, public entities must ensure that their services, programs, and activities are readily accessible to and usable by individuals with disabilities. Under Title III, places of public accommodation must remove architectural barriers where such removal is "readily achievable." Yet throughout Dorado, these legal imperatives have been subordinated to convenience, cost-saving, or simple neglect, creating an environment where the rights guaranteed by federal law remain theoretical rather than realized.
111. Courts have consistently recognized that the ADA's protections are not aspirational but mandatory, designed to ensure the equality of opportunity, full participation, independent living, and economic self-sufficiency of individuals with disabilities. The violations documented in this complaint reflect not just technical non-compliance but a fundamental undermining of these core principles, effectively relegating Mrs. Vázquez to second-class citizenship within her own community.
112. This court now faces a clear choice: to enforce the law as written and intended, compelling the defendants to fulfill their legal obligations, or to permit the status quo to continue, effectively endorsing the systematic exclusion of citizens with disabilities from full participation in community life. The evidence presented leaves no room for ambiguity: the defendants have violated federal law, causing concrete harm to Mrs. Vázquez and potentially countless others with mobility impairments who wish to navigate Dorado.
113. The prayer for relief outlined in this complaint seeks not extraordinary accommodations but basic compliance with established law—sidewalks that are navigable, entrances that are accessible, counters that are reachable, and spaces that are usable. These are not unreasonable demands but the minimal requirements of laws that have been in effect for decades, laws designed to ensure that citizens like Mrs. Vázquez can exercise their fundamental right to move through their communities with dignity and independence.

114. Justice requires not just recognition of these violations but meaningful intervention to remedy them, transforming Dorado from a landscape of exclusion to one of inclusion. This Court has both the authority and the obligation to vindicate the rights guaranteed by the ADA and the Rehabilitation Act, ensuring that the promise of equal access does not remain empty for Mrs. Dalia Vázquez Aguiñaga and all citizens with disabilities in Dorado. The remedial framework established in the San Juan case provides a proven template for addressing these violations systematically, efficiently, and effectively.
115. For the violations of Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, Mrs. Vázquez seeks nominal damages of \$1.00 each from the Commonwealth of Puerto Rico and the Municipality of Dorado. While modest in monetary terms, these nominal damages serve the critical legal function of vindicating Mrs. Vázquez's constitutionally protected civil rights and establishing the defendants' liability for their discriminatory conduct. As the Supreme Court affirmed in *Uzuegbunam v. Preczewski*, 141 S. Ct. 792 (2021), nominal damages provide tangible redress for past harms even when compensatory damages may be difficult to quantify, particularly in civil rights cases where the violation itself constitutes the injury.
116. Additionally, Mrs. Vázquez seeks compensatory damages of \$1.00 for the aggregate economic harms she has sustained as a direct result of the defendants' failure to maintain accessible sidewalks. These damages encompass not only the increased fuel consumption and vehicle maintenance costs incurred when forced to use motorized transportation, but also represent the broader economic burdens experienced by persons with disabilities due to inaccessible infrastructure. Research by the National Council on Disability has demonstrated that architectural barriers impose substantial "disability penalties"—hidden costs that include increased transportation expenses, specialized equipment needs, and reduced economic opportunities. Mrs. Vázquez, like many individuals with mobility impairments, faces a

systemic economic disadvantage when architectural barriers force reliance on costlier transportation alternatives for journeys that could otherwise be accomplished independently in her wheelchair at minimal expense.

117. The requested damages also recognize the dignitary harm inherent in forced dependence. As noted by disability rights scholars, the inability to navigate public spaces independently due to architectural barriers constitutes a form of "spatial marginalization" that limits full citizenship participation and reinforces societal perceptions of disability as dependency. By compelling Mrs. Vázquez to rely on others for transportation instead of using accessible sidewalks, the defendants have infringed upon her right to autonomous movement—a core component of dignity and personhood recognized in legal frameworks from the Americans with Disabilities Act to the United Nations Convention on the Rights of Persons with Disabilities. Though the compensatory damages sought are symbolic in amount, they represent the Court's acknowledgment of these tangible and intangible harms that result from the defendants' ongoing failure to provide equally accessible services to all citizens of Dorado.

IV. CONCLUSION AND PRAYER FOR RELIEF

After thorough documentation of the persistent and pervasive accessibility barriers throughout the Municipality of Dorado, we respectfully submit this conclusion detailing the specific relief requested from each defendant. The systematic discrimination experienced by Mrs. Dalia Vázquez Aguiñaga requires comprehensive remediation through court intervention to ensure her civil rights are protected and her dignity preserved.

WHEREFORE, the plaintiff, Mrs. Dalia Vázquez, respectfully requests that this Honorable Court grant the following legal remedies:

I. Relief Requested From The Commonwealth Of Puerto Rico

The Commonwealth 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 Highway #693 and other state-managed roadways in Dorado, 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 Dorado, 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 Dorado, 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, Mrs. Vázquez seeks nominal damages of \$1.00 each from the Commonwealth of Puerto Rico and the Municipality of Dorado. These nominal damages, while modest in amount, serve the crucial legal purpose of acknowledging the violation of Mrs. Vázquez's federally protected civil rights. Additionally, Mrs. Vázquez seeks compensatory damages of \$1.00 for the increased fuel consumption and vehicle maintenance

costs she has incurred each time she has been forced to rely on motorized transportation to access locations that she 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 Mrs. Vázquez by the defendants' failure to provide accessible pedestrian routes throughout Dorado, compelling her to depend on vehicular transport for even short distances that could otherwise be traversed in her wheelchair.

II. Relief Requested From The Municipality of Dorado

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

1. Repair and maintain all municipal sidewalks, curb ramps, and pedestrian pathways throughout Dorado, eliminating all barriers that prevent Mrs. Vázquez from safely navigating her community
2. Enforce parking regulations to prevent vehicles from illegally parking on sidewalks or blocking curb ramps, implementing penalties sufficient to deter such violations.
3. Revoke the use permits of all co-defendant businesses that were obtained 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, Mrs. Vázquez seeks nominal damages of \$1.00 each from the Commonwealth of Puerto Rico and the Municipality of Dorado. These nominal damages, while modest in amount, serve the crucial legal purpose of acknowledging the violation of Mrs. Vázquez's federally protected civil rights. Additionally, Mrs. Vázquez seeks compensatory damages of \$1.00 for the increased fuel consumption and vehicle maintenance costs she has incurred each time she has been forced to rely on motorized transportation to access locations that she 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 Mrs. Vázquez by the defendants' failure to provide accessible pedestrian routes throughout Dorado, compelling her to depend on vehicular transport for even short distances that could otherwise be traversed in her wheelchair.

III. Relief Requested From Interservice Group, Inc.; Innova Up Group LLC; Always Fresh LLC; Apolinar LLC

A. Interservice Group, Inc. (Mahi Mahi Shopping Village)

We request that Interservice Group, Inc. be ordered to:

1. Repair the deteriorated parking lot pavement to create a smooth, stable surface for wheelchair navigation.
2. Replace deteriorated ramps with properly designed, slip-resistant alternatives.
3. Resurface all access routes to stores to remove cracks, uneven sections, and obstructions.
4. Ensure that all common areas within the shopping center are fully accessible, including proper signage.
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 Mrs. Dalia Vázquez 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. Innova Up Group LLC (Al Pan Pan)

We request that Innova Up Group LLC be ordered to:

1. Replace tables to include proper height and depth for wheelchair access.
2. Lower service counters and payment stations to a maximum height of 36 inches.
3. Create an accessible section at the bar area no higher than 34 inches.
4. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Always Fresh LLC (Go Fresh)

We request that Always Fresh LLC be ordered to:

1. Replace or modify the heavy glass entrance door.
2. Lower and deepen the brown counter.
3. Adjust table layout to provide wider spaces for circulation.
4. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Apolinar LLC (La Hacienda Meat Center)

We request that Apolinar LLC be ordered to:

1. Replace the heavy glass entrance door with an automated alternative.
2. Lower display cases for visibility and access.
3. Widen aisles to allow unobstructed circulation
4. Lower shelves to accessible heights.
5. Reposition freezers and modify doors for easier operation.
6. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
7. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Relief Requested From Plaza Dorada, Inc.; Apple Caribe, Inc.; Metropol Dorado, Inc.; Brodersen Enterprises Of Puerto Rico, Inc.;

A. Plaza Dorada, Inc. (Plaza Dorada Shopping Center)

We request that Plaza Dorada, Inc. be ordered to:

1. Increase the number of accessible parking spaces and ensure they are clearly marked with appropriate signage.
2. Create properly designed access routes from parking areas to building entrances.
3. Modify tables throughout the shopping center to allow front access for wheelchair users.
4. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.

5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Apple Caribe , Inc. (Applebee's Grill + Bar.)

We request that Apple Caribe, Inc. be ordered to:

1. Rearrange tables and chairs to create adequate circulation space.
2. Provide accessible tables without restrictive bases.
3. Lower and deepen the counter.
4. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Metropol Dorado, Inc. (Metropol Dorado)

We request that Metropol Dorado, Inc. be ordered to:

1. Redesign tables to allow front access without obstacles.
2. Install accessible counter areas at appropriate heights.
3. Reconfigure table layout to expand space between tables.
4. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Brodersen Enterprises Of Puerto Rico, Inc. (Popeyes - Dorado)

We request that Brodersen Enterprises of Puerto Rico, Inc. be ordered to:

1. Lower the service counter and provide adequate depth.
2. Redesign tables to ensure front access for wheelchairs.
3. Widen aisles between tables to a minimum of 36 inches.
4. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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.

V. Relief Requested From Dorado Shopping Center Development Corp.; El Meson De Felipe, Inc.; Multisystems Restaurants, Inc.; 2 The Moon LLC

A. Dorado Shopping Center Development Corp. (Doramar Plaza)

We request that Dorado Shopping Center Development Corp. be ordered to:

1. Increase the number of properly designated accessible parking spaces.
2. Create an accessible route from the parking area to the stores.
3. Repair the deteriorated pavement in the parking lot.
4. Ensure all common areas within the shopping center are fully accessible.
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 Mrs. Dalia Vázquez 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. El Meson De Felipe, Inc. (El Meson Sandwiches)

We request that El Meson De Felipe, Inc. be ordered to:

1. Lower service and payment counters.
2. Adjust table arrangement to create adequate spacing.
3. Replace tables with accessible designs without obstructive bases.
4. Expand the restroom to provide sufficient maneuvering space.
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 Mrs. Dalia Vázquez 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. Multisystems Restaurants, Inc. (Sizzler Rest Dorado)

We request that Multisystems Restaurants, Inc. be ordered to:

1. Resurface the access ramp to provide a smooth, stable surface.
2. Install automatic door openers at the entrance.
3. Rearrange tables to create wider pathways.
4. Provide tables with open designs for wheelchair access.
5. Create an accessible buffet section.
6. Add a lower section to the payment counter.
7. Install proper accessibility signage for restrooms.
8. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.

9. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. 2 The Moon LLC (Taco Maker)

We request that 2 The Moon LLC be ordered to:

1. Replace the French-style entrance door with an automatic sliding door.
2. Add a lowered section to the order and payment counter.
3. Provide at least one accessible table with adequate clearance.
4. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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.

VI. Relief Requested From Dorado Shopping Center Development Corp.; Latin American Subs, LLC; Pedro Maldonado Frappe's LLC; The Yellow Door Coffee & Ice Cream Shop LLC

A. Dorado Shopping Center Development Corp. (Dorado del Mar Shopping Center)

We request that Dorado Shopping Center Development Corp. be ordered to:

1. Ensure all accessible parking spaces are properly marked with the International Symbol of Accessibility.
2. Create accessible routes from parking areas to building entrances.
3. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
4. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Latin American Subs, LLC (Firehouse Subs)

We request that Latin American Subs, LLC be ordered to:

1. Install automatic door openers.
2. Adjust table layout to improve circulation.
3. Clear obstructions from the lower section of the counter.
4. Increase counter depth for comfortable transactions.
5. Replace tables to eliminate support bars underneath.
6. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
7. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Pedro Maldonado Frappe's LLC (Sabor Frappe)

We request that Pedro Maldonado Frappe's LLC be ordered to:

1. Lower the payment counter and provide space underneath for frontal approach.
2. Replace tables with designs that don't have central supports with protruding legs.
3. Install slip-resistant flooring.
4. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. The Yellow Door Coffee & Ice Cream Shop LLC

We request that The Yellow Door Coffee & Ice Cream Shop LLC be ordered to:

1. Install an automatic door opener or more accessible handle.
2. Space indoor tables adequately for wheelchair navigation.
3. Replace tables with designs that allow wheelchair access.
4. Create an accessible section at the service counter.
5. Modify the restroom to include proper clearance beneath the sink, lower paper towel dispensers, and install grab bars.
6. Install a ramp to eliminate the step to the outdoor area.
7. Level and maintain the outdoor flooring.
8. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
9. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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.

VII. Relief Requested From Defendant Corporations Individually, Without a Business Located Within a Shopping Center

A. HSC Dorado LLC (Café Cuatro Sombras)

We request that HSC Dorado LLC be ordered to:

1. Designate properly marked accessible parking spaces.
2. Install a ramp at the entrance to eliminate the step.
3. Provide accessible tables with proper knee clearance.
4. Lower service counters to an accessible height.

5. Expand restrooms to provide sufficient maneuvering space.
6. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. De Holdings LLC (Embassy Suites Hotel Dorado Del Mar Beach Resort)

We request that De Holdings LLC be ordered to:

1. Replace carpets at the main entrance with a firmer, more stable surface.
2. Lower and deepen the lobby counter.
3. Create an accessible route to the internal kiosk.
4. Rearrange restaurant tables to improve circulation.
5. Lower the buffet counter and increase its depth.
6. Create accessible paths in the pool area.
7. Install ramps to provide access to kiosks around the pool.
8. Lower the pool bar counter.
9. Create an accessible route to the beach.
10. Remove carpeting in hotel rooms or provide accessible rooms without carpeting.
11. Increase circulation space in rooms.
12. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. De Holdings LLC (New York Grill And Steakhouse)

We request that De Holdings LLC be ordered to:

1. Replace the black carpet at the entrance with a firmer, more stable surface to improve

mobility for Mrs. Dalia Vázquez.

2. Install a lighter or automated glass door at the entrance to allow independent access for Mrs. Vázquez, given the current door's excessive weight.
3. Rearrange restaurant tables to improve circulation and provide easier access for wheelchair users like Mrs. Vázquez.
4. Lower the height of the gray bar counter to enable Mrs. Vázquez to interact with it, as her quadriplegia prevents her from reaching the current height.
5. Increase the depth of the gray bar counter to allow easier access to items placed further back.
6. Remove supports under the tables to allow Mrs. Vázquez to position her wheelchair closer for comfortable dining.
7. Pay compensatory and nominal damages to Mrs. Dalia Vázquez for violations of Title II of the ADA and Section 504 of the Rehabilitation Act, if found to have conspired or cooperated with public entities to cause these outcomes, particularly the unlawful acquisition of use permits.

D. Ancarem LLC (Kikita Beach House)

We request that Ancarem LLC be ordered to:

1. Designate accessible parking spaces with proper signage.
2. Create an accessible route from the parking area to the entrance.
3. Replace the entryway step with a properly designed ramp.
4. Replace the black entrance mat with a secure, non-slip alternative.
5. Rearrange tables to provide adequate circulation space.
6. Lower the brown bar counter and increase its depth.
7. Replace balcony tables with accessible alternatives.
8. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Los Pachangosos LLC (La Pachanga)

We request that Los Pachangosos LLC be ordered to:

1. Replace the entryway rug with a non-slip, secure alternative.
2. Level door thresholds to create even transitions.
3. Reorganize furniture to create wider pathways.
4. Replace tables with designs that allow wheelchair access.
5. Provide accessible seating at appropriate heights.
6. Lower service counters to a maximum height of 36 inches.
7. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Dorado Tierramar Corporation (La Terraza)

We request that Dorado Tierramar Corporation be ordered to:

1. Cease using the sidewalk as a parking area.
2. Lower service counters and remove obstructing chairs.
3. Provide accessible seating options.
4. Replace tables to allow front access for wheelchairs.
5. Install an elevator or ramp to provide access to the second floor.
6. Add ramps to areas with raised edges.
7. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Lula's Burger Corporación

We request that Lula's Burger Corporación be ordered to:

1. Clearly mark accessible parking spaces with proper signage.
2. Widen the entrance and provide proper signage indicating the accessible route.
3. Lower service counters and provide adequate depth.
4. Replace tables with designs that allow wheelchair access.
5. Modify restrooms to include wider doors and adequate maneuvering space.
6. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Melolaika Burguer LLC

We request that Melolaika Burguer LLC be ordered to:

1. Redesign the parking area with designated accessible spaces.
2. Lower service counters and provide adequate depth.
3. Replace tables with designs that allow front access for wheelchairs.
4. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. El Caballin Dorado Corp. (Pirilo Pizza Rústica – Dorado)

We request that El Caballin Dorado Corp. be ordered to:

1. Designate accessible parking spaces with proper markings.
2. Widen doorways to accommodate wheelchair passage.

3. Widen hallways inside the restaurant.
4. Lower service counters to accessible heights.
5. Replace tables with designs that allow wheelchair access.
6. Modify restrooms to provide adequate space and accessibility features.
7. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Karasu LLC (Punto Plena Bakery)

We request that Karasu LLC be ordered to:

1. Lower service counters and remove chairs that block access.
2. Replace tables with designs that provide adequate depth for wheelchair access.
3. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Katrina, Inc.

We request that Katrina, Inc. be ordered to:

1. Create designated accessible parking spaces with proper signage.
2. Lower service counters to accessible heights.
3. Rearrange tables to provide adequate space for circulation.
4. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. BRO PR LLC (Tres Palos Bar and Grill)

We request that BRO PR LLC be ordered to:

1. Install handrails at the accessible entrance.
2. Repair rocky surfaces near the stage.
3. Replace tables with designs that allow front access for wheelchairs.
4. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Zacarias-Navarro LLC (Rombo Asador Playero)

We request that Zacarias-Navarro LLC be ordered to:

1. Lower a section of the bar counter to an accessible height.
2. Rearrange furniture to provide at least 32 inches of clearance in passageways.
3. Modify restrooms with widened doors and adequate turning space.
4. Install proper accessibility signage.
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 Mrs. Dalia Vázquez 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..

N. Landy, Inc. (The Beer Shop)

We request that Landy, Inc. be ordered to:

1. Reposition the door to eliminate obstructions.
2. Level uneven flooring.

3. Rearrange tables to provide 32-inch clearance.
4. Provide at least one accessible table with knee space.
5. Lower service counters and create underspace access.
6. Reposition protruding shelves to open aisles for navigation.
7. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
8. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. The Pizza Boy Corp. (The Pizza Boy)

We request that The Pizza Boy Corp. be ordered to:

1. Replace the French door with an automatic or lever-handled door.
2. Remove or secure the unstable doormat.
3. Rearrange indoor seating to widen aisles.
4. Add wheelchair-accessible tables with under-table clearance.
5. Lower a section of the counter and remove obstructing chairs.
6. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
7. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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. Rondo, Inc. (Villa Dorada D'Alberto and Villa Dorada Sport Bar And Grill)

We request that Rondo, Inc. be ordered to:

1. Remove the doormat obstructing the entrance or replace it with a secure, non-slip surface.
2. Level door thresholds to create continuous access between areas.
3. Reorganize furniture to create wider pathways.
4. Replace tables to eliminate structural barriers.
5. Offer adjustable-height seating options.
6. Lower service counters to accessible heights.
7. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
8. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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..

Q. Goldo's Barbecue Corp. (Don Tako Cantina Mexicana)

We request that Goldo's Barbecue Corp. be ordered to:

1. Add accessible seating at the bar.
2. Incorporate a lower section at service counters.
3. Rearrange elements that obstruct circulation.
4. Widen pathways between tables.
5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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.

R. Green Bites Corp. (Don Tako Cantina Mexicana)

We request that Green Bites Corp. be ordered to:

1. Construct a properly inclined ramp at the main entrance.

2. Reorganize furniture to widen pathways.
3. Incorporate tables with appropriate height and free space underneath.
4. Install an accessible counter section with a lower height.
5. Enable a front space free of obstacles at counters.
6. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
7. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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.

S. Blooming Cup Corporación (Blooming Cup)

We request that Blooming Cup Corporación be ordered to:

1. Lower service and payment counters to accessible heights.
2. Create front clearance space at counters.
3. Reorganize furniture to optimize circulation space.
4. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
5. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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..

T. Dipea Wings LLC (Dipea Wings)

We request that Dipea Wings LLC be ordered to:

1. Provide accessible chairs at appropriate heights.
2. Replace tables with designs that don't have support bars.

3. Lower service counters and provide front clearance.
4. Clear obstructions from the route to counters.
5. Rearrange furniture to create wider pathways.
6. Remove carpets that obstruct circulation.
7. The removal of all the barriers indicated for this corporation in Section C of this Complaint is requested.
8. Pay compensatory and nominal damages to Mrs. Dalia Vázquez 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.

VIII. 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 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 Mrs. Dalia Vázquez Aguiñaga's civil rights are protected and that she can enjoy the full and equal access to public accommodations and services to which she is legally entitled. The requested remedies aim not only to address the specific barriers she

faces but to create a more inclusive and accessible community for all residents and visitors with disabilities in Dorado.

Dated: March 21, 2025.

VELEZ LAW GROUP LLC
Civil Rights Division

s/José Carlos Vélez Colón
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USDC-PR 231014

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PLAINTIFF'S ATTORNEY