

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

CYNTHIA E. CONCEPCIÓN BRUNO

Plaintiff

v.

CIVIL NO.

MUNICIPALITY OF VEGA ALTA;  
MAYOR OF VEGA ALTA MARÍA M.  
VEGA PAGÁN, IN HER OFFICIAL AND  
PERSONAL CAPACITIES; JOHN/JANE  
DOE(S), ADMINISTRATORS OF THE  
“NOTICIAS MUNICIPIO DE VEGA  
ALTA” FACEBOOK PAGE, IN THEIR  
OFFICIAL AND PERSONAL  
CAPACITIES

Defendants

**COMPLAINT AND DEMAND FOR JURY TRIAL**

**TO THE HONORABLE COURT:**

The Plaintiff, Cynthia E. Concepción Bruno, respectfully requests a Permanent Injunction against the Municipality of Vega Alta in accordance with 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. Additionally, this action is brought under 42 U.S.C. § 1983 as a civil rights claim against the Municipality of Vega Alta; Mayor of Vega Alta María M. Vega Pagán, In Her Official and Personal Capacities; John/Jane Doe(s), administrators of the “Noticias Municipio de Vega Alta” Facebook page, in their official and personal capacities, seeking injunctive relief and damages for violations of Plaintiff’s First Amendment rights.

**I. PARTIES**

1. The Plaintiff’s name is Cynthia E. Concepción Bruno and she is a resident of the Municipality of Vega Alta.
2. The Defendant, the Municipality of Vega Alta, is a municipal entity with the legal capacity to sue and be sued. At all relevant times to this cause of action, it supervised, operated, or owned the sidewalks and streets identified in Sections B and C of this Complaint. Additionally, the Municipality of Vega Alta operates an official Facebook page called "Noticias Municipio De Vega Alta" (hereinafter, the "Municipal Page"), which serves as an important channel of communication between the government and residents. The Municipal Page disseminates critical public information, including

announcements about roadwork, construction projects, public events, and emergency preparedness information, such as tsunami warnings and procedures.

3. Defendant Mayor of Vega Alta, María M. Vega Pagán, is sued in her official and personal capacities as the chief executive officer of the Municipality of Vega Alta, responsible for overseeing municipal operations, including the Municipality's official communications.
4. Defendants John/Jane Doe(s), administrators of the "Noticias Municipio de Vega Alta" Facebook page, are sued in their official and personal capacities for their role in managing the Municipal Page. As administrators, they have control over its content, interactions, and user engagement. They are responsible for managing posts, moderating comments, and determining which users can participate in discussions. Through their actions, they exercise discretion over the flow of public information and the accessibility of governmental communications, effectively shaping the public forum that the Municipal Page represents.

## **II. FIRST CAUSE OF ACTION: TITLE II OF THE AMERICANS WITH DISABILITIES ACT AND SECTION 504 OF THE REHABILITATION ACT, 29 U.S.C.**

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

5. Mrs. Cynthia E. Concepción Bruno is a person with a disability diagnosed with Neuromyelitis Optica, a neurological condition that affects the central nervous system, specifically the optic nerve and spinal cord. As a result of this disease, she has developed multiple lesions in the spinal cord, significantly impacting her mobility and her ability to perform various daily activities independently.
6. Due to her condition, Mrs. Cynthia ambulates with the assistance of a rollator walker, a device that helps her move but does not eliminate the challenges she faces in her daily life. Walking, climbing stairs, jumping, kneeling, and standing for prolonged periods are particularly difficult for her, requiring significant physical effort and often leading to fatigue or discomfort. These limitations affect her ability to engage in essential activities such as grocery shopping, attending medical appointments, and participating in social events. Additionally, Neuromyelitis Optica can cause further symptoms such as muscle weakness, spasms, and coordination problems, exacerbating the difficulties she experiences in her daily life.

7. Mrs. Cynthia holds disability identification cards issued by the Department of Transportation and Public Works (DTOP) and the Department of Health, officially recognizing her as a person with a disability and granting her certain rights and benefits designed to facilitate her mobility and access to essential services.

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

8. The sidewalks and sidewalks ramps in controversy are the followings:
  - 8.1. The sidewalk located on Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, from coordinates 18.41230531865792, -66.3299986747066 to coordinates 18.412179403802845, -66.33096080701883, in front of the Farmacia Amadeo, Amedco Vega Alta and Biblioteca Digital.
    - 8.1.1. The sidewalk at the corner located on Gabriel Hernández St., Vega Alta, PR 00692-7017, at coordinates 18.41217847145077, -66.33098425008649.
  - 8.2. The sidewalk ramp located on 64 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.41228740100577, -66.33013072210768, in front of the Biblioteca Digital.
  - 8.3. The sidewalk ramp located on 70 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.412353568448328, -66.32967675824159, in front of the Dailyn Centro de Servicios Multidisciplinarios, Inc.
  - 8.4. The sidewalk ramp located on Jacinto Seijo St., Vega Alta, PR 00692-0000, at coordinates 18.412350387321887, -66.32961707909219, in front of La Esquina Bendecida.
  - 8.5. The sidewalk located on 54 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, from coordinates 18.412350723652057, -66.32959290919115 to coordinates 18.412404166568795, -66.32900215266551, in front of the Strong Heart Taekwondo Academy, Panadería Mi Viejo and Centro de Servicios Integrados.
  - 8.6. The sidewalk ramp located on 28 Colón St., Vega Alta, PR 00692-6559, at coordinates 18.412414346170813, -66.32897868333218.
  - 8.7. The sidewalk ramp located on 28 Colón St., Vega Alta, PR 00692-6559, at coordinates 18.412421980871365, -66.32891833363055.

- 8.8. The sidewalk located on 50 Colón St., Vega Alta, PR 00692-7074, from coordinates 18.412317950660874, -66.328912337383 to coordinates 18.41197120745698, -66.32889020915833, in front of the Iglesia Jesus el Pan de Vida, Amore Gelato Puerto Rico and Laboratorio Clínico Vega Alta.
- 8.8.1. The sidewalk at the corner located on Colón St., Vega Alta, PR 00692-7074, at coordinates 18.41234436139805, -66.32890291092791, in front of the American Gasoline.
- 8.9. The sidewalk ramp located on 54 Colón St., Vega Alta, PR 00692-7074, at coordinates 18.4119508481996, -66.32887612756109 in front of the Laboratorio Clínico Vega Alta.
- 8.10. The sidewalk ramp located on Georgetti St., Vega Alta, PR 00692-7051, at coordinates 18.411883258124778, -66.3288789475252 in front of the Dr. Wilson Vargas.
- 8.11. The sidewalk ramp is also located on Georgetti St., Vega Alta, PR 00692-7051, at coordinates 18.411893437756856, -66.32893661501788.
- 8.12. The sidewalk located on 51-43 Georgetti St., Vega Alta, PR 00692-7051, from coordinates 18.4118883090968, -66.32897415123529 to coordinates 18.411827231293508, -66.32956960162481.
- 8.13. The sidewalk ramp located on 51-43 Georgetti St., Vega Alta, PR 00692-7051, at coordinates 18.41182019126536, -66.32959025268791.
- 8.14. The sidewalk ramp located on 65-53 St. Georgetti, Vega Alta, PR 00692-7049, at coordinates 18.411816373901775, -66.32964792018059.
- 8.15. The sidewalk located on 65-53 Georgetti St., Vega Alta, PR 00692-7049, from coordinates 18.41181474262571, -66.32966530340694 to coordinates 18.411710401322726, -66.33086961523712, in front of the VEGACOOOP.
- 8.15.1. The sidewalk at the corner located on Georgetti St., Vega Alta, PR 00692-7049, at coordinates 18.411714218686043, -66.3308904023608.
- 8.16. The sidewalk located on 65-53 Georgetti St., Vega Alta, PR 00692-7049, from coordinates 18.41175896195401, -66.33088360932395 to coordinates 18.41182533072325, -66.33028819045646, in front of the Oficina Dental Georgetti.

- 8.16.1. The sidewalk at the corner located on Georgetti St., Vega Alta, PR 00692-7049, at coordinates 18.411752195309372, -66.33089730979468.
- 8.17. The sidewalk ramp located on Jose Vega Nevarez St., Vega Alta, PR 00692-7000, at coordinates 18.41183996395224, -66.33026807388642.
- 8.18. The sidewalk located on Jose Vega Nevarez St., Vega Alta, PR 00692-7000, from coordinates 18.411848269871903, -66.33027547635834 to coordinates 18.41216002089621, -66.33030967452275.
- 8.19. The sidewalk ramp located on Jose Vega Nevarez St., Vega Alta, PR 00692-7000, at coordinates 18.41208367375866, -66.3303043101012.
- 8.20. The sidewalk ramp located on 37 Jose Vega Nevarez St., Vega Alta, PR 00692-7000, at coordinates 18.412175926546936, -66.3303083334155.
- 8.21. The sidewalk located on 37 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, from coordinates 18.412159384672695, -66.33032710888187 to coordinates 18.412104669227684, -66.33094334639534, in front of the Iglesia Recinto Biblico.
- 8.21.1. The sidewalk at the corner located on Gabriel Hernández St., Vega Alta, PR 00692-7017, at coordinates 18.412111667716378, -66.33095407523211.
- 8.22. The sidewalk located on Luis Muñoz Rivera St., Vega Alta, PR 00692-7000, from coordinates 18.412193817148804, -66.33023369717986 to coordinates 18.41233740623331, -66.32900177771074, in front of the Plaza Gilberto Concepción de Gracia, Farmacia Nueva Vega Alta, Pistachio's - LaBoutik de las Cookies and Parroquia La Inmaculada Concepción.
- 8.22.1. The sidewalk at the corner located on Colón St., Vega Alta, PR 00692-7074, at coordinates 18.412334014749344, -66.3289756461645.
- 8.23. The sidewalk located on Colón St., Vega Alta, PR 00692-7074, from coordinates 18.41231846963547, -66.32896813084206 to coordinates 18.411970453976707, -66.32893527378201, in front of the Parroquia La Inmaculada Concepción.
- 8.23.1. The sidewalk at the corner located on Colón St., Vega Alta, PR 00692-7074, at coordinates 18.411958909397928, -66.32893601039089.

- 8.24. The sidewalk located on Luis Muñoz Rivera St., Vega Alta, PR 00692-7000, from coordinates 18.41195572826361, -66.32895277420182 to coordinates 18.411849571686595, -66.3301981532494, in front of the Plaza Gilberto Concepción de Gracia and Parroquia La Inmaculada Concepción.
- 8.25. The sidewalk ramp located on Luis Muñoz Rivera St., Vega Alta, PR 00692-7000, at coordinates 18.411850349541723, -66.33019888544511, in front of the Plaza Gilberto Concepción de Gracia.
- 8.26. The sidewalk located on Jose Vega Nevarez St., Vega Alta, PR 00692-7000, from coordinates 18.411852827571035, -66.33021365658324 to coordinates 18.412158216327295, -66.33024584309045, in front of the Plaza Gilberto Concepción de Gracia.
  - 8.26.1. The sidewalk at the corner located on Luis Muñoz Rivera St., Vega Alta, PR 00692-7000, at coordinates 18.412177369984303, -66.33024448299864, in front of the Plaza Gilberto Concepción de Gracia.
- 8.27. The sidewalk on 1st Street, Vega Alta, PR 00692-0000, at coordinates 18.417871230094406, -66.31134006205637, before crossing towards Ópalo Street.
- 8.28. The sidewalk on 1st Street, Vega Alta, PR 00692-0000, at coordinates 18.417415940583993, -66.31137995935318, before crossing towards 3rd Street.
- 8.29. The sidewalk on 1st Street, Vega Alta, PR 00692-6099, at coordinates 18.41613185630236, -66.31145911887053, in front of Guayacán Housing and Christian Charismatic Church.
- 8.30. The sidewalk on 1st Street, Vega Alta, PR 00692-6099, at coordinates 18.414967775359244, -66.31044405160131, in front of Imprenta Dávila and Aníbal Salón.
- 8.31. The sidewalk ramp located on Street Ópalo, Vega Alta, PR 00692-0000, at coordinates 18.41770608087836, -66.31126643460637, next to 1st Street.
- 8.32. The sidewalk on Street Ópalo, Vega Alta, PR 00692-0000, at coordinates 18.417706080878656, -66.31106091034462, before crossing towards Street Topacio.

- 8.33. The sidewalk located on Street Topacio, Vega Alta, PR 00692-0000, at coordinates 18.417811690962576, -66.3107906777875.
- 8.34. The sidewalk ramp located on Street Ópalo, Vega Alta, PR 00692-0000, at coordinates 18.417740963156835, -66.3107432582571.
- 8.35. The sidewalk located on Street Topacio, Vega Alta, PR 00692-6054, at coordinates 18.417732403431618, -66.3105571828068 in front of Wesleyan Church of Vega Alta.
- 8.36. The sidewalk ramp located on Street 3, Vega Alta, PR 00692-0000, at coordinates 18.417149604357892, -66.31132656330452, in front of 1st Street.
- 8.37. The sidewalk ramp located on Street 3, Vega Alta, PR 00692-0000, at coordinates 18.415860623713876, -66.31006618076717, in front of 2nd Street.
- 8.38. The sidewalk located on Street 3, Vega Alta, PR 00692-0000, at coordinates 18.417152691689562, -66.3111212663913, before crossing towards 4th Street.
- 8.39. The sidewalk ramp located on Street 4, Vega Alta, PR 00692-0000, at coordinates 18.417041592396178, -66.31088924687762.
- 8.40. The sidewalk located on Street 4, Vega Alta, PR 00692-0000, at coordinates 18.41691944042576, -66.31088656466855.
- 8.41. The sidewalk located on Street 3, Vega Alta, PR 00692-6602, at coordinates 18.417087399362718, -66.31048155109686, in front of Rafael Hernández School.
- 8.42. The sidewalk located on Street 3, Vega Alta, PR 00692-0000, at coordinates 18.416175928646883, -66.31024174891971.
- 8.43. The sidewalk ramp located on Street 2, Vega Alta, PR 00692-6083 at coordinates 18.415264185810614, -66.31065895232759, next to 1st Street.
- 8.44. The sidewalk located on Street 2, Vega Alta, PR 00692-6083 at coordinates 18.415625785186474, -66.3101853861802, in front of NW Bilingual Academy.
- 8.45. The sidewalk located on Street 8, Vega Alta, PR 00692-0000 at coordinates 18.415967330798317, -66.30908589178226, in front of Street 2.
- 8.46. The sidewalk located on Street 9, Vega Alta, PR 00692-0000 at coordinates 18.414993158414024, -66.30885813079452, in front of Street 8.

- 8.47. The sidewalk ramp located on Street 5, Vega Alta, PR 00692-6099 at coordinates 18.41488501321064, -66.31022305529015, in front of Panadería Santa Ana.
- 8.48. The sidewalk located on Street 5, Vega Alta, PR 00692-0000 at coordinates 18.414998259611203, -66.3101016853333, before reaching Street 7.
- 8.49. The sidewalk located on Street 7, Vega Alta, PR 00692-0000 at coordinates 18.41591653122321, -66.30963664746626, in front of 2nd Street.
- 8.50. The sidewalk located on Street 7, Vega Alta, PR 00692-0000, at coordinates 18.415627346358637, -66.30963137158706.
- 8.51. The sidewalk located on Street 7, Vega Alta, PR 00692-0000, at coordinates 18.41546831395374, -66.3096323138131, in front of Street 5.
- 8.52. The sidewalk on Gabriel Hernández St., Vega Alta, PR 00692-0000 at coordinates 18.414447893310754, -66.3313958579274, is located around the Vega Alta Multifunctional Park.
- 8.53. The sidewalk on Jaime Acosta St., Vega Alta, PR 00692-0000 at coordinates 18.41329762999998, -66.3306895491856, is located in front of the Héctor Flores passive park.
- 8.54. The sidewalk on 17 Jacinto Seijo St., Vega Alta, PR 00692-0000 at coordinates 18.412948947984873, -66.32975152145653, is located in front of the Urbana Elementary School.
- 8.55. The sidewalk on Jacinto Seijo St., Vega Alta, PR 00692-0000 at coordinates 18.412993661587677, -66.32942823290983.
- 8.56. The corner of the sidewalk on Jacinto Seijo St., Vega Alta, PR 00692-0000, at coordinates 18.412959840080465, -66.32967087794714.
- 8.57. The sidewalk on 9 Jacinto Seijo St., Vega Alta, PR 00692-0000 at coordinates 18.41252165179487, -66.32969343721666, is located in front of a business Streetd Chispas de Azúcar Cake & Coffee Shop.
- 8.58. The sidewalk on the corner of 9 Jacinto Seijo St., Vega Alta, PR 00692-0000 at coordinates 18.412861046571425, -66.32974366861201, is located at this intersection.

- 8.59. The sidewalk on 36 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000 at coordinates 18.41248611469197, -66.32835058863998, is located in front of the business Farmacia Vega Alta.
- 8.60. The sidewalk on 38 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000 at coordinates 18.41243236153954, -66.32850897247252, is located in front of Laboratorio Clínico Teresita Vega Alta (formerly Ebenezer).
- 8.61. The sidewalk on 149 Muñoz Rivera St., Vega Alta, PR 00692-0000 at coordinates 18.411994086029242, -66.33137691165564, is located in front of the business Panadería y Repostería Del Carmen.
- 8.62. The sidewalk on Candelaria Road, Vega Alta, PR 00692-0000 at coordinates 18.411958022839976, -66.33172797615813, is located in front of the businesses known as Cafetería El Company Bar, El Poder Indio, and Flacos Pincho's.
- 8.63. The sidewalk on 25 Gabriel Hernández St., Vega Alta, PR 00692-0000 at coordinates 18.41363868932464, -66.3316661838717, is located near Residencial Francisco Vega Sanchez and the business Nelly's Baby Food Center.
- 8.64. The sidewalk on 25 Gabriel Hernández St., Vega Alta, PR 00692-0000 at coordinates 18.41313694545233, -66.33169413172949, is located near Residencial Francisco Vega Sanchez and in front of Supermercado Centro Ahorros Nelly.
- 8.65. The sidewalk in Bajura, Vega Alta, PR 00692-0000 at coordinates 18.413741698549153, -66.33303243807927, is located in front of Extension Sanchez.
- 8.66. The sidewalk on Santo Domingo St., Vega Alta, PR 00692-0000 at coordinates 18.410637916173574, -66.33197493389312, is located near the business Street El Boringalle.
- 8.67. The sidewalk on 80 Unión St., Vega Alta, PR 00692-0000 at coordinates 18.41130247572425, -66.33009090995921.
- 8.68. The sidewalk on 80 Sur St., Vega Alta, PR 00692-0000 at coordinates 18.41057256813005, -66.3302008760718.
- 8.69. The sidewalk on 42 Libertad St., Vega Alta, PR 00692-0000 at coordinates 18.410998263006874, -66.33025859281088.

- 8.70. The sidewalk on 3 E. Giboyeaux St., Vega Alta, PR 00692-0000 at coordinates 18.411643490101895, -66.3271473294251.
- 8.71. The sidewalk on 1 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000 at coordinates 18.4128959693594, -66.32688867852079 is located in front of and around the Iglesia Discípulos De Cristo Vega Alta 2.
- 8.72. The sidewalk on 12 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000 at coordinates 18.412544202563645, -66.32744738856749, is located near BL Uniforms, Blessed Family Nutrition, and hit Factory Batting Cage.
- 8.73. The sidewalk on PR-2, Vega Alta, PR 00692-0000 at coordinates 18.41561862353752, -66.32958392453718, is located in front of Fresenius Kidney Care Vega Alta.
- 8.74. The sidewalk on PR-2 Km 30.7, Lot #3, Espinosa Industrial Park, Vega Alta, PR 00692-0000 at coordinates 18.4148563905483, -66.33085859631123, is located in front of Toledo & Co. LLC.
- 8.75. The sidewalk on 100 PR-2, Vega Alta, PR 00692-0000 at coordinates 18.414480275037732, -66.32958064614537, is located in front of United States Postal Service.
- 8.76. The sidewalk on the corner of 100 PR-2, Vega Alta, PR 00692-0000 at coordinates 18.414361259463103, -66.32887568063691, is located at this intersection.
- 8.77. The sidewalk on the corner of 100 PR-2, Vega Alta, PR 00692-0000 at coordinates 18.414535167687944, -66.32975347096287, is located at this intersection.
- 8.78. The sidewalk on 1 Gabriel Hernández St., Vega Alta, PR 00692-0000 at coordinates 18.414339180400177, -66.32862860978703, is located near the Policía Municipal de Vega Alta.
- 8.79. The sidewalk on 1 Gabriel Hernández St., Vega Alta, PR 00692-0000 at coordinates 18.414602081861144, -66.32877832737593, is located near the Policía Municipal de Vega Alta.

- 8.80. The sidewalk on 1 Gabriel Hernández St., Vega Alta, PR 00692-0000 at coordinates 18.414419343844035, -66.32887403191266, is located near the Policía Municipal de Vega Alta.
- 8.81. The sidewalk on PR-2, Vega Alta, PR 00692-0000 at coordinates 18.41477510118259, -66.32887457019027, is located in front of the Estación de Bomberos Vega Alta.
- 8.82. The sidewalk in Vega Alta, PR 00692-0000 at coordinates 18.41715778759936, -66.329374472464, is located in front of CTD Warehouse.
- 8.83. The sidewalk on 17th Street, Entrance to Sector Ponderosa, Vega Alta, PR 00692-0000 at coordinates 18.41409840855083, -66.32728440865603, is located near the food cart Street Bulldog Burger Grill & More.
- 8.84. The sidewalk on 17th St., Entrance to Sector Ponderosa, Vega Alta, PR 00692-0000 at coordinates 18.41403258468816, -66.32688011391902, is located near the food cart Street Bulldog Burger Grill & More.
- 8.85. The sidewalk on 17th St., Vega Alta, PR 00692-0000 at coordinates 18.415894240090655, -66.32651133752424, is located near the Escuela Bo. La Ponderosa.
- 8.86. The sidewalk on 17th St., Vega Alta, PR 00692-0000 at coordinates 18.41691850952042, -66.32665098189679, is located near the Escuela Bo. La Ponderosa.
- 8.87. The sidewalk on 3rd St., Vega Alta, PR 00692-0000 at coordinates 18.41655793601849, -66.32620163716089, is located near the Escuela Bo. La Ponderosa.
- 8.88. The sidewalk on 3rd St., Vega Alta, PR 00692-0000 at coordinates 18.41645809018464, -66.3248370998582.
- 8.89. The sidewalk on 4th St., Vega Alta, PR 00692-0000 at coordinates 18.416827180481274, -66.3252759313167, is located near the Escuela Bo. La Ponderosa.
- 8.90. The sidewalk on 4th St., Vega Alta, PR 00692-0000 at coordinates 18.416831973848872, -66.32501775674397, is located in front of Iglesia El Shaddai AIC.

- 8.91. The sidewalk on 18th St., Vega Alta, PR 00692-0000 at coordinates 18.4175373145876, -66.32332881868187.
- 8.92. The sidewalk on 5th St., Vega Alta, PR 00692-0000 at coordinates 18.4170342837846, -66.32349281105122.
- 8.93. The sidewalk on 5th St., Vega Alta, PR 00692-0000 at coordinates 18.417117589329187, -66.32484802715969.
- 8.94. The sidewalk on 2nd St., Vega Alta, PR 00692-0000 at coordinates 18.415929608429725, -66.32544545032772.
- 8.95. The sidewalk on 1st St., Vega Alta, PR 00692-0000 at coordinates 18.4153213922453, -66.3265399991078.
- 8.96. The sidewalk on Aguila St., Vega Alta, PR 00692-0000 at coordinates 18.415700154793466, -66.32071339025447.
- 8.97. The sidewalk on Monseñor Berrios St., Vega Alta, PR 00692-0000 at coordinates 18.417149020456066, -66.32007038738911.
- 8.98. The sidewalk on Monseñor Berrios St., Vega Alta, PR 00692-0000 at coordinates 18.417192918771846, -66.31995639350374.
- 8.99. The sidewalk on Monseñor Berrios St., Vega Alta, PR 00692-0000 at coordinates 18.41714055505645, -66.31981653177029.
- 8.100. The sidewalk on Padre Rivera St., Vega Alta, PR 00692-0000 at coordinates 18.416912848766756, -66.3189845433429.
- 8.101. The sidewalk at the corner of Padre Rivera St. & José Aponte St., Vega Alta, PR 00692-0000 at coordinates 18.417399922879458, -66.3173088453318, is located at this intersection.
- 8.102. The sidewalk on 14th Colibrí St., Vega Alta, PR 00692-0000 at coordinates 18.414823245406144, -66.32115522512218.
- 8.103. The sidewalk at the intersection of Colibrí St. & Cisne St., Vega Alta, PR 00692-0000 at coordinates 18.41446441912148, -66.3210948754248.
- 8.104. The sidewalk on Cisne St., Vega Alta, PR 00692-0000 at coordinates 18.41430811773052, -66.32148457839575.

- 8.105. The sidewalk on Calandria St., Vega Alta, PR 00692-0000 at coordinates 18.4134990084808, -66.32198354777935, is located near businesses such as La Pizzelta and Sabor Frappé.
- 8.106. The sidewalk at the corner of Calandria St., Vega Alta, PR 00692-0000 at coordinates 18.413357524484415, -66.32206010062993, is located in this area, near businesses such as La Pizzelta and Sabor Frappé.
- 8.107. The sidewalk at the corner of Calandria St., Vega Alta, PR 00692-0000 at coordinates 18.413357524484415, -66.32195563788592, is located in this area, near businesses such as La Pizzelta and Sabor Frappé.
- 8.108. The sidewalk on Zorzal St., Vega Alta, PR 00692-0000 at coordinates 18.41435482310486, -66.31944095675506.
- 8.109. The sidewalk at 58 Flamenco St., Vega Alta, PR 00692-0000 at coordinates 18.41363199710657, -66.31752559021916, is located in front of the business True Value VA Plumbing & Electrical Supply Inc.
- 8.110. The sidewalk on Reina St., Vega Alta, PR 00692-0000 at coordinates 18.41504694729579, -66.31997246913532.
- 8.111. The sidewalk on 105th St., Vega Alta, PR 00692-0000 at coordinates 18.417128369886047, -66.3222736864371.

**c. Discrimination in Municipality of Vega Alta against Cynthia Concepcion due to her disability**

9. Mrs. Concepción feels discouraged from visiting several places located in Vega Alta because she knows she cannot enjoy them due to the architectural barriers present at those locations.
10. Mrs. Cynthia Concepción greatly enjoys visiting places because she values the independence it gives her to navigate the streets, do her shopping, and attend her medical appointments without having to rely on others. For her, going out is not just a matter of necessity, but also of autonomy and emotional well-being. These activities allow her to feel connected to her surroundings and community, and they are a way for her to maintain high self-esteem. For this reason, she frequently needs to cross the sidewalk located on Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, from coordinates 18.41230531865792, -66.3299986747066 to coordinates 18.412179403802845, -66.33096080701883, in front of the Farmacia Amadeo, Amedco Vega Alta and

Biblioteca Digital. She uses this route because it gives her access to essential services she regularly needs, such as the pharmacy for her medications. However, since November 2024, she has been discouraged from using this sidewalk due to the barriers present, which makes her feel frustrated, limited, and creates a sense of isolation. The barriers are as follows:

- 10.1. Mrs. Cynthia is aware of the barriers present on the sidewalk, which hinder her mobility and cause significant inconveniences due to her health condition. The curbs are very high, requiring considerable physical effort for her to overcome them with her rollator walker, which can easily tip over when trying to go up, leading to fatigue and increasing the risk of falls. Additionally, the sidewalk is too narrow, limiting her ability to maneuver safely, especially when she has to navigate around obstacles. The uneven surfaces and bumps along the path worsen her situation, as she suffers from coordination problems and muscle weakness, making walking on irregular terrain a constant challenge. Furthermore, obstacles such as posts and streetlights block her way, forcing Mrs. Cynthia to make uncomfortable and dangerous movements to avoid collisions. All of this creates a sense of insecurity, frustration, and exhaustion, affecting her physical and emotional well-being and discouraging her from using the sidewalk.
- 10.2. On the corner of the same sidewalk, specifically located at Gabriel Hernández St., Vega Alta, PR 00692-7017, at coordinates 18.41217847145077, -66.33098425008649, there are no access ramps. Mrs. Cynthia is aware of the barriers created by the lack of a ramp. Ramps are essential because they provide safe, obstacle-free access for those who use assistive devices such as walkers, wheelchairs, or canes. For someone like Mrs. Cynthia, who relies on a walker to move, facing elevated curbs without a ramp means exerting excessive physical effort, which increases the risk of falls, fatigue, and injury. Additionally, the constant struggle to climb or descend curbs without an adequate ramp can cause both physical and emotional strain, further reducing her independence and quality of life, and discouraging her from using the sidewalk altogether.
- 10.3. To address the barriers Mrs. Cynthia faces, several solutions can be implemented. First, the curbs should be lowered or equipped with proper ramps to facilitate

access with her rollator walker, ensuring a smoother and safer transition. Installing ramps at key points where the curbs are currently too high would eliminate the need for excessive physical effort, reducing the risk of falls, fatigue, and injury. Additionally, widening the sidewalk would provide more space for safe maneuvering, eliminating the challenges of navigating around obstacles. Repairing the uneven surfaces and leveling the bumps would greatly improve her ability to walk, reducing the risk of falls and physical strain. It is also crucial to reposition or remove any obstacles, such as posts and streetlights, that block the path, creating a clear and safe route. These changes would not only make the sidewalk more accessible but also restore Mrs. Cynthia's confidence and independence, enhancing her overall quality of life.

10.4. The municipality of Vega Alta has the responsibility to implement these solutions, as they must ensure the safety and well-being of all citizens, especially those with disabilities. The municipality has the duty to guarantee that public spaces, such as sidewalks, comply with the Americans with Disabilities Act (ADA). By addressing these barriers, the municipality would not only be fulfilling its legal obligations but also demonstrating a commitment to inclusion and equitable access for everyone, regardless of their physical limitations. It is crucial that they take immediate action to ensure the sidewalk is accessible and safe for Mrs. Cynthia. If these barriers are resolved, Mrs. Cynthia would feel great relief and happiness knowing that she can once again safely and confidently use the sidewalk.

11. Mrs. Cynthia cannot access the ramp located at 64 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.41228740100577, -66.33013072210768, in front of the Biblioteca Digital, and as a result, she cannot access the previously mentioned sidewalk and the library. Since October 2024, she has been aware of the barriers present on this ramp that prevent her from using it:

11.1. Mrs. Cynthia is aware of the barriers present on the ramp, which affect her ability to use it effectively due to her health condition. The ramp does not lead directly to the street, requiring her to first climb a high curb, which is especially difficult for her due to muscle weakness and coordination problems caused by her condition.

Using her rollator walker, this additional effort increases the risk of falls and causes fatigue, further hindering her mobility. Additionally, the ramp does not lead to an open space but has a post in the center at the end, blocking the path and leaving insufficient room to maneuver safely with her walker. These barriers create insecurity and frustration for Mrs. Cynthia, limiting her ability to move independently. For these reasons, she has been discouraged from using the ramp.

11.2. To address the barriers that Mrs. Cynthia faces, it is necessary to implement accessible solutions that facilitate her mobility. The high curb should be completely removed and replaced with a smooth, continuous ramp designed specifically for people with reduced mobility. This ramp should be wider and provide direct access from the street without the need for unnecessary physical effort, which would reduce the risk of falls and fatigue. Additionally, the ramp could feature slip-resistant materials to enhance safety, especially on rainy days. Regarding the post blocking the path at the end of the ramp, one solution would be to relocate it to an area where it does not interfere with access. If this is not possible, clear and visible signage could be installed to indicate a safe detour or an alternative route to prevent it from obstructing the way. With these solutions, not only would the ramp's accessibility improve, but Mrs. Cynthia's independence and safety would also increase, allowing her to move with confidence and ease in the area.

11.3. The municipality of Vega Alta has the responsibility to address the barriers present on the ramp in compliance with the ADA. Accessibility is a right, and ensuring that infrastructures such as ramps are functional is part of this legal obligation. By addressing the barriers that hinder the use of this ramp, the municipality would not only be fulfilling its legal responsibilities but also demonstrating a commitment to inclusion, equity, and the well-being of its residents. If these barriers are properly addressed, Mrs. Cynthia is able to use the ramp safely and confidently, which allows her to improve her mobility and continue with her daily activities without obstacles.

12. For Mrs. Concepción, cannot use the ramp located at 70 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.412353568448328, -66.32967675824159, in

front of the Dailyn Centro de Servicios Multidisciplinarios, Inc. She is aware of the barriers present on the ramp, which make her feel insecure and discouraged from using it. As a result, since September 2024, she has been deterred from using it.

- 12.1. Mrs. Cynthia is aware of the barriers present on the ramp located in front of the Dailyn Centro de Servicios Multidisciplinarios, Inc. The cracks on the ramp pose a significant obstacle for her, as using a rollator walker makes it difficult to maintain balance on uneven surfaces, increasing the risk of falls. The lack of curbs on the sides of the ramp is also a problem, as there is no support to prevent her from losing balance, which is crucial due to her coordination and muscle control difficulties. Additionally, the ramp is narrow and leads to equally narrow sidewalks, limiting her ability to maneuver the walker, especially in such tight spaces. These barriers directly affect her mobility, making it difficult for her to move safely and independently. Because of these obstacles, she feels discouraged from using the ramp, knowing that she cannot access it with the safety and comfort she requires.
- 12.2. To address the barriers Mrs. Cynthia faces on the ramp, it is necessary to repair the cracks with high-quality materials that ensure a smooth and even surface. Additionally, a safety edge should be added to the sides of the ramp to prevent Mrs. Cynthia from losing balance. These edges should be high enough to provide effective support without being an additional obstacle to passage. On the other hand, the ramp should be widened to allow more space for maneuvering the rollator walker comfortably. The width of the sidewalks connected to the ramp should also be extended so that Cynthia can move without restrictions. Lastly, to ensure the ramp remains in optimal condition, there should be a regular maintenance program to repair any damage or wear over time, preventing the barriers from recurring. If these barriers are addressed, Mrs. Cynthia is able to use the ramp without limitations.
- 12.3. The Municipality of Vega Alta has a crucial responsibility in addressing the barriers that affect Mrs. Cynthia's accessibility. As part of its commitment to inclusion and the well-being of all citizens, especially those with reduced mobility, it is the municipality's responsibility to ensure that public infrastructures,

such as ramps and sidewalks, are suitable and safe for use. This includes the obligation to maintain ramps in optimal condition, making repairs when necessary, and ensuring they comply with established accessibility standards.

13. Since October 2024, Mrs. Cynthia has wanted to use the ramp located at Jacinto Seijo St., Vega Alta, PR 00692-0000, at coordinates 18.412350387321887, -66.32961707909219, in front of La Esquina Bendecida. However, she is aware of the barriers present on the ramp, which has discouraged her from using it, knowing that she is not able to do so with the safety and comfort she needs.

- 13.1. Mrs. Cynthia is conscious of the barriers present on the ramp located in front of La Esquina Bendecida. The ramp has cracks and is bent, which makes safe passage difficult, especially when using her rollator walker, as these irregularities pose a fall risk due to her muscle weakness and coordination problems. Additionally, the lack of curbs on the sides of the ramp makes it even harder to maintain balance, which is crucial for her due to her difficulties with body control. A post obstructs the end of the ramp, blocking access and limiting her ability to maneuver the walker. The ramp is also narrow and leads to equally narrow sidewalks, preventing her from moving comfortably and increasing the risk of accidents. Due to all these barriers, Mrs. Cynthia feels discouraged and dissuaded from using the ramp, as she knows she won't be able to do so safely or with the comfort she needs.

- 13.2. To resolve the barriers on the ramp, several measures need to be implemented. Firstly, the cracks and deformation of the ramp must be repaired using durable and suitable materials to ensure a smooth and stable surface. Additionally, safety curbs should be installed along the sides of the ramp, made of non-slip materials, to provide extra support without obstructing the path. The post that obstructs the end of the ramp should be relocated or removed, allowing for clear and safe access. Furthermore, the ramp should be widened to provide adequate space for maneuvering the rollator walker with ease and safety, so Cynthia can move without restrictions or the risk of accidents. With the implementation of these solutions, the ramp will become much more accessible, allowing Mrs. Cynthia to

use it safely and comfortably. Once these barriers are resolved, Mrs. Cynthia will be happy to use the ramp.

13.3. The Municipality of Vega Alta has the fundamental responsibility of addressing the barriers present on the ramp to ensure the accessibility and safety of Mrs. Cynthia. The Municipality must ensure that public infrastructures, such as ramps and sidewalks, are adequate, safe, and accessible for all individuals. This includes the obligation to carry out timely repairs on the ramp, such as fixing cracks, correcting deformations, installing safety curbs, and ensuring that access is free of obstructions, such as the post blocking the end of the ramp. Additionally, the municipality must ensure compliance with accessibility regulations and take proactive measures to maintain the ramp and sidewalks in good condition by conducting regular inspections and preventive repairs. In this way, the municipality of Vega Alta plays a crucial role in ensuring that Mrs. Cynthia can enjoy safe, unobstructed access, improving her quality of life and promoting inclusion.

14. Mrs. Cynthia wants to use the sidewalk located at 54 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, from coordinates 18.412350723652057, -66.32959290919115 to coordinates 18.412404166568795, -66.32900215266551, in front of the Strong Heart Taekwondo Academy, Panadería Mi Viejo and Centro de Servicios Integrados. However, since December 2024, Mrs. Cynthia has been discouraged from using it due to the architectural barriers present, which make it difficult for her to pass and make her feel excluded and discriminated against. These barriers not only affect her mobility but also contribute to a sense of limitation and inaccessibility in a space that should be for everyone. The barriers are as follows:

14.1. Mrs. Cynthia is aware of the barriers present on the sidewalk located at 54 St. Luis Muñoz Rivera. The sidewalk is too narrow, which makes it difficult for her to pass with her rollator walker, limiting her ability to maneuver easily and increasing the risk of falls. Additionally, it is obstructed by posts, buildings, and structures in the middle of the path. These constructions, such as building entrances or protruding structural elements, block the free passage and reduce the available space on the sidewalk. Due to her use of a rollator walker, she faces

significant difficulties maneuvering around these obstructions. These structures can be dangerous, as the lack of enough space to pass safely could force Cynthia to dodge or even stop abruptly, which increases the chances of falls. These obstacles pose a significant challenge for her, as her mobility is already compromised due to her health condition, which affects her coordination and muscle strength. This lack of accessibility on the sidewalk makes her feel that the space is not designed for her safety and well-being, which discourages and dissuades her from using it.

14.2. To resolve the barriers present on the sidewalk, several measures must be taken. First, it is crucial to widen the sidewalk to provide enough space for Mrs. Cynthia to maneuver comfortably with her rollator walker, avoiding the narrowness that currently limits her passage. Additionally, the posts, buildings, and structures obstructing the path should be relocated or removed to ensure a clear, unobstructed passage. Building entrances or protruding structural elements should be adjusted according to accessibility regulations to ensure they do not block the way. It would also be beneficial to install warning signs about existing obstacles to alert pedestrians and improve safety. With the implementation of these solutions, the sidewalk will be much more accessible and safe, allowing Mrs. Cynthia to use it independently and comfortably. When these barriers are resolved, Mrs. Cynthia will be happy to use the sidewalk.

14.3. As part of its commitment to inclusion and the well-being of the community, the Municipality of Vega Alta must ensure that the sidewalks are free of obstacles, wide enough, and in good condition to facilitate Mrs. Cynthia's safe passage. Therefore, it is the municipality's responsibility to carry out the necessary repairs and make modifications to the structures and elements that obstruct the path, such as posts and buildings in the middle of the sidewalk.

15. Mrs. Cynthia wants to use the ramp located at The sidewalk ramp located on 28 Colón St., Vega Alta, PR 00692-6559, at coordinates 18.412414346170813, -66.32897868333218. This ramp is particularly important to her because it directly connects to several essential services in the neighborhood, which makes it easier for her to carry out her daily activities without relying on external assistance. However, she is

discouraged from using it due to the barriers she knows are present on the ramp, which hinder her passage and compromise her safety:

- 15.1. Mrs. Cynthia is aware of the barriers present on the ramp. The ramp is too narrow, making it difficult for her to pass with her rollator walker and limiting her ability to maneuver safely. Additionally, a post obstructs the end of the ramp, blocking her access and creating an added risk of accidents, as she cannot pass through easily. The lack of curbs on the sides of the ramp makes it even harder to maintain balance, which is a significant challenge due to her coordination problems and muscle weakness. Lastly, the cracks in the surface of the ramp increase the risk of falls, as her mobility is already compromised due to her health condition. Due to these barriers, Mrs. Cynthia feels discouraged and deterred from using the ramp, knowing that she is not able to do so safely or with the comfort she needs.
- 15.2. To resolve the issue of the narrow ramp, it should be widened to provide enough space and allow Mrs. Cynthia to maneuver her rollator walker safely. This would enable her to move more freely, without the fear of hitting walls or being restricted in her movements. Additionally, the post obstructing the end of the ramp should be relocated or completely removed, ensuring clear and unobstructed access. Regarding balance, the installation of sturdy, non-slip curbs on both sides of the ramp would provide support and stability, which is crucial for Mrs. Cynthia due to her coordination difficulties. Furthermore, the cracks in the ramp's surface should be repaired with durable, high-quality materials to create a smooth and even surface, reducing the risk of tripping or falling. With these barriers addressed, Mrs. Cynthia will use the ramp.
- 15.3. The Municipality of Vega Alta, as the entity responsible for public infrastructure, must ensure that ramps and sidewalks are safe and accessible for all individuals. This includes maintaining and repairing the infrastructure to ensure that no barriers exist that could jeopardize the safety of users. In this case, the Municipality must take charge of widening the ramp, relocating the post, installing non-slip curbs, and repairing the cracks in the surface of the ramp to facilitate safe access for Mrs. Cynthia. These actions are not only part of its legal

obligation but also a social responsibility to ensure inclusion and improve the quality of life for all residents of Vega Alta.

16. Mrs. Cynthia considers that the ramp located at 28 Colón St., Vega Alta, PR 00692-6559, at coordinates 18.412421980871365, -66.32891833363055, is useful for accessing the benefits of the sidewalk businesses, such as shops and other essential services, providing easier and safer access, allowing her to move more independently, which is why she wants to use it. However, since October 2024, she has been discouraged from using it due to the architectural barriers she knows are present on the ramp, which make access difficult and compromise her safety, leaving her feeling frustrated and excluded. The barriers are:

- 16.1. Mrs. Cynthia is aware that the ramp is bent, which compromises its stability and can cause her rollator walker to tilt dangerously, increasing the risk of falls. Additionally, the ramp lacks edges, making it even more unsafe for her, as the absence of lateral support prevents her from maintaining balance, which is crucial due to her coordination difficulties. Furthermore, the ramp is cracked, creating surface irregularities that increase the risk of tripping, especially considering her muscle weakness and spasms. These barriers directly affect her ability to use the ramp safely and comfortably, which discourages her from attempting to use it.

- 16.2. To address the barriers faced by Mrs. Cynthia on the ramp, several corrective actions need to be taken. First, it is essential to fix the deformation of the ramp and ensure its surface is level and stable, using appropriate materials to prevent her rollator walker from tilting dangerously. Additionally, the lack of lateral edges should be addressed by installing non-slip curbs on both sides, providing the necessary support to maintain balance and prevent falls. The cracks in the surface should also be repaired to create a safer, more even pathway. Finally, a regular maintenance program will ensure the ramp remains in optimal condition, preventing future damage. With these solutions in place, Mrs. Cynthia will be able to use the ramp safely and comfortably.

- 16.3. The Municipality of Vega Alta plays a crucial role in addressing the barriers faced by Mrs. Cynthia on the ramp. It must intervene by providing the necessary resources and oversight to correct the ramp's deformations, install non-slip curbs,

and repair the cracks in the surface. Additionally, it is essential for the municipality to implement a regular maintenance program to ensure the ramp remains in optimal condition over time. The municipality's role is not limited to physical infrastructure; it can also support awareness of the importance of accessibility, promoting collaboration with other entities and organizations to create a more inclusive urban environment.

17. Starting in November 2024, Mrs. Cynthia has attempted to use the sidewalk located at 50 Colón St., Vega Alta, PR 00692-7074, from coordinates 18.412317950660874, -66.328912337383 to coordinates 18.41197120745698, -66.32889020915833, in front of the Iglesia Jesus el Pan de Vida, Amore Gelato Puerto Rico and Laboratorio Clínico Vega Alta. However, she has been discouraged from doing so due to the architectural barriers that prevent her access and make her feel frustrated. One of the reasons Mrs. Cynthia insists on using this sidewalk because she wants to be able to attend the restaurant Club “Cumpliendo Metas”, a place that not only represents an opportunity to enjoy a good meal but also allows her to feel connected to the community and enjoy a social and cultural experience that brings her much joy. Being able to use the sidewalk to reach the restaurant is a need that goes beyond simple comfort; it is a matter of rights and dignity. The lack of access has caused her discomfort and sadness and discourages her from using the sidewalk. The barriers present are the following:

- 17.1. The barriers present on the sidewalk directly affect Mrs. Cynthia due to her use of a rollator walker and her mobility limitations, and she is aware that the sidewalk is too narrow, making it difficult for her to maneuver with the walker, as she needs enough space to move safely. Additionally, posts and obstacles such as tables and other items placed by neighbors block her path, preventing her from moving forward without the risk of falls or injuries. These obstacles affect her coordination and create an unsafe environment for her mobility, which makes her feel discouraged from going out and walking through that area.
- 17.2. In addition to the previously mentioned obstacles, at the corner of the sidewalk located on Colón St., Vega Alta, PR 00692-7074, at coordinates 18.41234436139805, -66.32890291092791, in front of the American Gasoline, there is no access ramp. This lack of a ramp creates an even greater barrier for

Mrs. Cynthia, as the sidewalk is quite high and is obstructed by a sign and a patch of grass at that corner. Since she uses a rollator walker, this type of barrier significantly hinders her ability to access that part of the sidewalk. The height of the sidewalk and the absence of an accessible ramp prevent her from safely going up or down, putting her stability at risk and increasing the likelihood of falls, especially considering her coordination issues related to her medical condition. Mrs. Cynthia's mobility is greatly limited, as she cannot continue her journey through that area without finding a way to navigate around this barrier, which forces her to backtrack or find an alternative route. This situation makes her even more discouraged from going out and using the sidewalk, as the physical barriers in the environment reinforce feelings of insecurity and dependence.

17.3. To improve Mrs. Cynthia's accessibility and overcome the current barriers, it would be essential to widen the sidewalk to provide the necessary space for her to maneuver safely with her rollator walker. Additionally, it would be important to remove obstacles such as tables and other items placed by neighbors, ensuring that the path is completely clear of obstructions that could pose a risk to her mobility. Furthermore, an appropriate ramp should be installed at the corner of Colón Street, in front of American Gasoline, to allow for a smooth and safe transition. This ramp should have a gentle incline and a slip-resistant surface to prevent falls, especially considering her coordination issues. The sign and the grass patch blocking that area should also be removed to create an accessible space. Finally, clear signage could be placed to indicate the location of the ramp, which would help her plan her route. If these measures are implemented, Mrs. Cynthia would be able to use the sidewalk with greater safety and confidence, improving her independence and reducing the barriers she currently faces.

17.4. The responsibility of the Municipality of Vega Alta in improving sidewalk accessibility and removing the barriers faced by Mrs. Cynthia is crucial. The municipality has the duty to ensure that public infrastructure is accessible to all citizens, especially those with reduced mobility. This includes planning, maintaining, and adapting sidewalks, ramps, and other urban facilities to meet the accessibility standards established by local and national laws. Additionally, the

municipality must ensure the proper removal of obstacles, such as those placed by neighbors, that can interfere with free passage and pose a safety risk to pedestrians. It is essential for the municipality to take steps to identify and address these issues by installing necessary ramps, widening sidewalk spaces, and ensuring that pathways are safe for Mrs. Cynthia. If the municipality takes on this responsibility and acts accordingly, it will promote a more inclusive and accessible city for all.

18. Mrs. Cynthia wishes to use the ramp located at 54 Colón St., Vega Alta, PR 00692-7074, at coordinates 18.4119508481996, -66.32887612756109 in front of the Laboratorio Clínico Vega Alta, for several practical reasons. This ramp allows her easy access to an area where she handles essential medical appointments and procedures, facilitating her mobility to a place she frequently visits. Additionally, it provides a direct route to services that are crucial for her health, such as the laboratory, without the need to take detours that could be more difficult to navigate with her walker. However, despite the convenience of this ramp, since December 2024, she has been discouraged from using it due to the architectural barriers that make safe and comfortable access difficult. The need to use this ramp is clear, but the current conditions cause her to feel uncertain about her safety:

- 18.1. Mrs. Cynthia is aware of the barriers present on the ramp located in front of the Laboratorio Clínico Vega Alta. The ramp is uneven, making it difficult for her to access with her rollator walker, as the irregular incline increases the risk of instability, directly affecting her ability to maintain balance. Additionally, the lack of curbs on the sides of the ramp poses an additional danger, as there is no structure to limit her path, making it easy for her to fall off the edges. At the end of the ramp, it connects to a narrow sidewalk, which further limits her ability to move safely, as the reduced space doesn't allow her to maneuver comfortably. These barriers impact her coordination and safety while walking, which makes her feel discouraged from using the ramp, as the current conditions prevent her from navigating that area with confidence and independence.

- 18.2. To improve the accessibility of the ramp and eliminate existing barriers, several key measures can be implemented. Firstly, the ramp should be properly leveled to

ensure a smooth, uniform incline that allows for safe and easy access. This would involve repairing the surface to make it both smooth and slip-resistant, reducing the risk of falls or accidents. Additionally, curbs should be added along the sides of the ramp to prevent Mrs. Cynthia from accidentally falling off the edges, enhancing safety. Lastly, the sidewalk leading to the ramp should be expanded to provide adequate space for maneuvering without obstacles, ensuring that Mrs. Cynthia can move comfortably and securely. These changes would significantly improve her mobility and provide a safer, more accessible experience for everyone.

18.3. Improving urban accessibility in Vega Alta is a crucial responsibility for the Municipality to ensure that all citizens, particularly those with reduced mobility like Mrs. Cynthia, can navigate the streets safely and independently. It is the Municipality's duty to identify and eliminate architectural barriers that compromise the safety and well-being of people with disabilities, such as issues with ramps or the absence of protective curbs. The Municipality should take a proactive approach to create an accessible environment by implementing necessary improvements and ensuring that all pathways are secure for everyone. By fulfilling this responsibility, the municipality would help foster a more inclusive city where all residents, regardless of their health conditions, can fully engage in community life.

19. The use of ramps at sidewalk corners is essential to ensure accessibility for individuals with reduced mobility. These ramps provide a safe transition between the sidewalk and the street, making it easier for people who use mobility devices, such as wheelchairs or walkers, to access public spaces without the need for additional effort or facing unnecessary risks. They are a critical component of an inclusive and safe urban infrastructure. Mrs. Cynthia, aware of the importance of these ramps, had considered using the one located on Georgetti St., Vega Alta, PR 00692-7051, at coordinates 18.411883258124778, -66.3288789475252 in front of the Dr. Wilson Vargas. However, since September 2024, she has been discouraged from using it due to the architectural barriers present on the ramp. Although it was initially a viable option for her, the

irregularities and obstacles in its design make safe access difficult, causing her to feel insecure about using it. The barriers she has identified are as follows:

- 19.1. Mrs. Cynthia is aware of the barriers present on the ramp located at Georgetti St. The ramp is cracked, making it unstable and difficult to navigate with her rollator walker, as the cracks cause tripping or loss of stability, putting her safety at risk. Additionally, the lack of curbs on the sides of the ramp increases the risk of falls, as there is no protection to prevent her from accidentally veering off the ramp. Finally, the ramp leads to a narrow sidewalk, which further limits her ability to move easily and safely, as the reduced space doesn't allow her to maneuver comfortably with the walker. These barriers directly affect her coordination and stability, and as a result, she feels discouraged from using it, as the current conditions of the ramp do not provide the safety she needs to move independently.
- 19.2. One way to address the barriers on the ramp is to repair the cracks to ensure a smooth and even surface, which will allow Mrs. Cynthia to navigate safely with her rollator walker without the risk of tripping or losing stability. Adding curbs on both sides of the ramp would also provide essential protection, preventing her from accidentally veering off and reducing the risk of falls. Additionally, widening the narrow sidewalk leading to the ramp would create more space, making it easier and safer for her to maneuver. Once these changes are made, Mrs. Cynthia will feel very happy to use the ramp, as it will provide a safe and accessible route that will allow her to move with confidence.
- 19.3. The Municipality of Vega Alta plays a fundamental role in implementing these solutions. As the responsible party for public infrastructure, the Municipality must ensure that sidewalks, ramps, and other facilities are accessible and safe for all citizens. To address the barriers present on the ramp, the Municipality must take the initiative to repair the cracks, install the necessary curbs, and widen the narrow sidewalk leading to the ramp. These actions are essential to create an accessible, inclusive, and safe urban environment. Additionally, it is the Municipality's responsibility to perform continuous maintenance of these improvements to ensure that they remain in good condition and continue to be safe in the long term.

20. As mentioned, Mrs. Cynthia understands how crucial ramps are for her mobility and safety, as they allow for a smooth transition between the sidewalk and the street, facilitating her movement with the rollator walker. For this reason, in October 2024, she attempted to use the ramp located at Georgetti St., Vega Alta, PR 00692-7051, at coordinates 18.411893437756856, -66.32893661501788. However, she was unable to do so due to the barriers present on the ramp, which prevented her from accessing it safely. The irregularities on the ramp and the lack of proper design discourage her from using it, reinforcing the feeling of insecurity and discrimination she faces due to the current state of the infrastructure.

20.1. Mrs. Cynthia is aware of the barriers present on the ramp. The ramp is not perpendicular to the edge of the sidewalk, which makes it difficult for her rollator walker to align properly and increases the risk of losing stability when trying to maneuver. Additionally, the ramp is narrow, further limiting her ability to move comfortably and safely, as she needs enough space to maneuver with the walker. The ramp is also bent, making the transition between the sidewalk and street uneven, which poses an added risk of tripping. The lack of edges on the sides of the ramp increases the risk of falls, as there is no protection to prevent her from veering off accidentally. To make matters worse, a pole is located right next to the ramp, further obstructing her path and forcing her to maneuver with extra caution. These barriers directly affect her coordination and stability, making her feel unsafe, and as a result, she is discouraged from using the ramp.

20.2. To address the barriers present on the ramp, several improvements are necessary. The ramp should be relocated to be perpendicular to the face of the sidewalk, allowing for a smoother transition between the sidewalk and the street, facilitating safe passage for Mrs. Cynthia with her rollator walker. If the ramp is aligned perpendicularly, it ensures that the slope is more uniform and gentle, enabling a smoother and safer movement, preventing unexpected deviations into inaccessible areas. Additionally, the ramp should be widened to provide the necessary space for her to move comfortably without restrictions. It's important that the ramp be leveled and straight, eliminating any curves or uneven surfaces that could cause tripping or loss of stability. Borders should also be added on both sides of the

ramp to prevent Mrs. Cynthia from accidentally veering off and reduce the risk of falls. Finally, the nearby post should be relocated or removed to ensure the path is completely clear. With these modifications, the ramp will be safer and more accessible, allowing Mrs. Cynthia uses it with confidence and ease.

- 20.3. The Municipality of Vega Alta has a crucial role in improving urban accessibility, especially regarding ramps and other public infrastructure. To address the barriers present in the ramp, the Municipality must take proactive measures, such as relocating the ramp to make it perpendicular to the edge of the sidewalk, expanding its space to ensure the comfort and safety of users, and removing any nearby obstacles that may interfere with passage. Additionally, the Municipality must ensure the continuous maintenance of these improvements.
21. Mrs. Cynthia wishes to use the sidewalk located at 51-43 Georgetti St., Vega Alta, PR 00692-7051, from coordinates 18.4118883090968, -66.32897415123529 to coordinates 18.411827231293508, -66.32956960162481, because she enjoys walking in the area, appreciating the peaceful atmosphere and its proximity to several points of interest. This sidewalk allows her to take pleasant walks, which is an important part of her daily routine. However, in November 2024, when attempting to use it, she was discouraged by the multiple architectural barriers she encountered, which made her feel unsafe:
  - 21.1. Mrs. Cynthia is cognizant of the barriers present on the sidewalk located at 51-43 Georgetti St., Vega Alta, PR, which directly affect her mobility and safety. The sidewalk is too narrow, limiting her ability to maneuver comfortably with her rollator walker, as the reduced space doesn't allow her to move easily. Additionally, there are uneven surfaces, increasing the risk of tripping and losing stability, which is particularly problematic due to her coordination issues. There are also obstacles such as posts, lamps, and protruding infrastructure that block her path and force her to make dangerous maneuvers to avoid them, which could result in falls or accidents. Furthermore, cars are parked directly in front of the sidewalk, forcing her into traffic to continue walking, creating an even more unsafe environment. Because of these barriers, Mrs. Cynthia feels discouraged from using the sidewalk, as she does not consider it a safe place to walk due to the difficulties she faces when trying to use it.

- 21.2. To resolve the barriers present on the sidewalk located at 51-43 Georgetti St., Vega Alta, PR, it is essential to widen the sidewalk to allow for the comfortable and safe passage of Mrs. Cynthia with her rollator walker, eliminating the uneven surfaces that make it difficult for her to move and pose a risk to her stability. Moreover, it is necessary to relocate or adapt the posts, street lamps, and protruding structures so they do not block the path and create a clear space. A measure should also be implemented to prevent vehicles from parking on the sidewalk, either through visible signage or stricter penalties. Finally, it is crucial to install proper curbs and ensure that the surfaces are level and non-slip, with regular maintenance to ensure they remain obstacle-free. With these solutions, Mrs. Cynthia will be able to use the sidewalk without issues.
- 21.3. It is the Municipality of Vega Alta that should address the barriers present on the sidewalk, should take action to widen the sidewalk, relocate or adapt obstacles like posts and street lamps, and implement measures to prevent vehicles from blocking the path, through the use of clear and visible signage prohibiting parking on the sidewalk, with signs indicating that the area is designated exclusively for pedestrian passage. Additionally, the municipality has the authority to strengthen local legislation with stricter penalties for those who violate the rule. This could include fines for drivers who park illegally on the sidewalks, which would serve as an effective deterrent. It is crucial that the Municipality not only implement these measures but also ensure a monitoring and enforcement program with trained personnel to oversee the most problematic areas.
22. The good condition and functionality of sidewalk ramps are essential to ensure safe and accessible mobility for individuals with reduced mobility, like Mrs. Cynthia. Well-designed and well-maintained ramps allow those who use assistive devices, such as wheelchairs or walkers, to move easily and without risk. Since October 2024, Mrs. Cynthia has wanted to use the ramp located at 51-43 Georgetti St., Vega Alta, PR 00692-7051, at coordinates 18.41182019126536, -66.32959025268791, as a way to access local services. However, she has been discouraged from using it due to the architectural barriers present on the ramp, which make it difficult and pose a safety risk when trying to use it. The barriers are:

- 22.1. Mrs. Cynthia is aware that the ramp presents several obstacles that make it difficult to use safely. Chiefly, a post is located at the end of the ramp, blocking the path and posing an immediate risk of accident. Additionally, the ramp is not positioned perpendicular to the face of the sidewalk, which creates an uneven slope that complicates her movement. This is especially problematic for Mrs. Cynthia, as using a rollator walker, a ramp that is perpendicular to the sidewalk allows for smoother and safer movement, without the risk of veering off the ramp into an inaccessible area. The lack of curbs on the sides also poses a danger, as Mrs. Cynthia could accidentally veer off the ramp and fall. The ramp's surface is cracked, increasing the risk of tripping, and the ramp leads to a narrow sidewalk, which further limits her ability to maneuver safely. These barriers directly affect her stability and coordination, and due to the combination of these obstacles, she feels discouraged from using the ramp.
- 22.2. To address the barriers present on the ramp, the post located at the end of the ramp should be relocated or completely removed, as it currently blocks the path and presents a significant risk of injury. Next, the ramp should be repositioned to be perpendicular to the face of the sidewalk. This adjustment will create a smoother and more gradual slope, facilitating easier and safer movement for Mrs. Cynthia when using her rollator walker. The ramp should also be widened to accommodate more space, allowing for comfortable navigation and reducing the risk of accidental deviations off the ramp. Additionally, curbs should be added to both sides of the ramp to prevent Mrs. Cynthia from veering off the path. The cracked surface should be repaired, ensuring it is smooth and non-slip to minimize the possibility of losing stability. Once these modifications are made, the ramp will be safer, more accessible, and fully functional for Mrs. Cynthia, allowing her to use it with confidence.
- 22.3. The Municipality of Vega Alta must actively intervene to correct the existing barriers, such as the post blocking the path, the lack of perpendicularity of the ramp to the sidewalk, and other elements that hinder access. Additionally, it is the municipality's responsibility to carry out regular monitoring and maintenance of the infrastructure to ensure that it remains safe in the long term. By implementing

these solutions, the municipality can ensure a more inclusive city, ensuring that all people, regardless of their health conditions, can move safely and comfortably.

23. Right in front of the aforementioned ramp, there is another ramp located at 65-53 St. Georgetti, Vega Alta, PR 00692-7049, at coordinates 18.411816373901775, -66.32964792018059. Mrs. Cynthia has also attempted to use this ramp, but since November 2024, she has been discouraged from doing so due to the existing barriers. Although she hopes this ramp could provide a safe alternative, the difficulties it presents make it unfeasible for use. Aware of the obstacles she faces with both ramps, she feels frustrated as every time she tries to access them, she encounters architectural barriers that hinder her mobility, increasing her sense of insecurity.

- 23.1. Mrs. Cynthia knows that the ramp has cracks in its surface, which increases the risk of tripping and losing stability while using her rollator walker, as these irregularities make movement unsafe. Additionally, the ramp is too small for a walker, limiting her ability to maneuver comfortably and increasing the effort required to cross it. The size of the ramp is also disproportionate to the sidewalk, creating an uncomfortable and dangerous transition between the street and the sidewalk, making safe access difficult. Moreover, the lack of curbs on the sides of the ramp makes it easy to accidentally veer off and fall, which puts her safety at risk. Due to these barriers, Mrs. Cynthia feels discouraged from using the ramp, as these conditions make her feel insecure and vulnerable when trying to move.

- 23.2. To address the barriers present on the ramp, several solutions need to be implemented to ensure safe and accessible use for Mrs. Cynthia. First, the cracks in the ramp's surface must be repaired to provide a smooth, level, and non-slip surface, eliminating any trip hazards. This will improve stability and safety when using her rollator walker. Secondly, the ramp should be widened to accommodate the width of the walker, ensuring enough space for comfortable movement. This adjustment will prevent the walker from getting stuck or causing Mrs. Cynthia to exert extra effort when navigating the ramp. Additionally, the ramp's size must be proportional to the sidewalk to create a seamless transition between the sidewalk and the street, eliminating the risk of sudden inclines or slopes that could destabilize her. Curbs should also be added to both sides of the ramp to prevent

accidental deviations from the path and reduce the risk of falls. The curbs will act as protective barriers, safely guiding her along the ramp. Once these changes are made, Mrs. Cynthia will be able to use the ramp with confidence, as it will be more accessible, safe, and suitable for her mobility needs.

23.3. It is the responsibility of the municipality of Vega Alta to take action and implement the necessary changes to improve the safety and functionality of the ramp. This includes repairing the cracks in the surface, widening the ramp to accommodate the rollator walker, and ensuring that the ramp's dimensions align with the sidewalk for a smooth and safe transition. The municipality should also install curbs on both sides of the ramp to prevent accidents and maintain a clear, obstacle-free path. Furthermore, it is the municipality's duty to monitor and maintain these changes over time, ensuring that the infrastructure remains in good condition and continues to serve the community effectively. Through these actions, the municipality can create a more inclusive and accessible urban environment, providing Mrs. Cynthia with the confidence and freedom to move safely.

24. Mrs. Cynthia wants to use the sidewalk located at 65-53 Georgetti St., Vega Alta, PR 00692-7049, from coordinates 18.41181474262571, -66.32966530340694 to coordinates 18.411710401322726, -66.33086961523712, in front of the VEGACOOOP, as it provides access to valuable services and community benefits offered by the cooperative. VEGACOOOP is an important establishment for her, providing essential services that are part of her daily routine, such as shopping for groceries, banking, and social interactions. However, since September 2024, Mrs. Cynthia has been dissuaded from using this sidewalk due to the architectural barriers that make it difficult for her to navigate safely. These barriers significantly impact her ability to access these services, and despite her desire to use the sidewalk, the challenges posed by the environment discourage her from doing so.

24.1. Mrs. Cynthia is cognizant of the barriers present on the sidewalk. The sidewalk is obstructed by several posts and fences blocking the path, which poses a significant risk as her rollator walker cannot maneuver properly around these obstacles. Additionally, there are infrastructures such as stairs that interfere with

her direct and safe access. The sidewalk is also too narrow, further complicating movement, especially due to the muscle weakness and coordination problems caused by her neurological condition. These barriers directly affect her stability and mobility, leading to a sense of insecurity when trying to use it. Due to these obstacles, Mrs. Cynthia feels discouraged from going to this location and is unable to confidently access the services in the area.

- 24.2. In addition to the mentioned barriers, the corner of the sidewalk located at Georgetti St., Vega Alta, PR 00692-7049, at coordinates 18.411714218686043, -66.3308904023608, lacks a ramp, which further exacerbates the situation for Mrs. Cynthia. Since she uses a rollator walker to move around, the absence of a ramp at this corner prevents her from accessing it safely and comfortably. Her medical condition, Neuromyelitis Optica, affects her mobility and coordination, making it even more difficult to overcome curbs or navigate areas that do not have proper ramps. The lack of direct and safe access at this corner limits her ability to move independently, increasing her sense of insecurity and frustration, which discourages her from using this area and accessing nearby services.
- 24.3. To resolve the barriers present on the sidewalk, the posts and fences obstructing the path must be relocated or completely removed to create a clear, obstacle-free route. This will allow for smoother navigation. Additionally, any infrastructure, such as stairs, should be restructured to enable Mrs. Cynthia to move safely. The sidewalk should also be widened to accommodate the width of the walker and provide enough space for comfortable movement, minimizing the risk of veering off the path. Furthermore, it is important to repair any cracks or irregular surfaces, ensuring that the pavement is smooth, level, and non-slip, which will reduce the risk of tripping or losing balance. Moreover, to address the lack of a ramp at the corner of the sidewalk, a proper ramp should be installed, providing an accessible and safe transition from the street to the sidewalk. This addition will greatly improve accessibility for Mrs. Cynthia, allowing her to navigate the area with ease. By implementing these measures, Mrs. Cynthia will be able to use the sidewalk regularly.

- 24.4. The Municipality of Vega Alta has the responsibility to ensure that the conditions of the sidewalks meet the accessibility standards established in local and national regulations, taking preventive measures to prevent obstacles such as posts, fences, and other infrastructures from obstructing the safe passage of pedestrians. The municipality must also work towards creating an inclusive urban environment where the mobility of individuals with conditions such as Neuromyelitis Optica is facilitated through appropriate adjustments. This not only involves the removal of physical barriers but also the constant maintenance of infrastructures to prevent long-term issues. In addition, the municipality must address the lack of ramps at key areas, such as the corner of the sidewalk located on Georgetti St., Vega Alta. Installing proper ramps that are aligned with the sidewalk and meet the necessary dimensions for accessibility will ensure a smoother and safer transition for people with mobility impairments. These ramps should be designed to accommodate walkers, wheelchairs, and other mobility aids, offering a safe and convenient path for individuals like Mrs. Cynthia. Furthermore, regular inspection and maintenance of these ramps, alongside the necessary repairs, will guarantee their continued usability, improving overall pedestrian safety and accessibility in the area.
25. The sidewalk located at 65-53 Georgetti St., Vega Alta, PR 00692-7049, from coordinates 18.41175896195401, -66.33088360932395 to coordinates 18.41182533072325, -66.33028819045646, in front of the Oficina Dental Georgetti, provides more direct and convenient access to nearby businesses and services in the area, such as the Georgetti Dental Office, which offers essential dental treatment for well-being. Mrs. Cynthia is aware of this, and since August 2024, she has wanted to use this sidewalk, but she knows about the architectural barriers present in the area, which has discouraged her from using the sidewalk. The barriers that Mrs. Cynthia knows are:
- 25.1. The sidewalk presents several barriers that pose a significant danger to Mrs. Cynthia, who uses a rollator walker due to her health condition. It is too narrow, limiting her ability to maneuver safely with the walker. The height of the sidewalk is one of the most serious issues, as it not only hinders safe movement but also increases the risk of falls. Since her mobility is affected by Neuromyelitis Optica,

a condition that impacts her coordination and causes muscle weakness, any unevenness in the surface of the sidewalk can destabilize her and put her at risk of tripping. In addition, there are cracks in the surface of the sidewalk, which are not only uncomfortable to walk on but can also be dangerous traps for those who rely on assistive devices like her rollator walker. These cracks can catch the wheels of the walker or even cause slipping, increasing the risk of injury. The combination of a high, uneven sidewalk with cracks is particularly discouraging for Mrs. Cynthia. These physical obstacles, combined with her vulnerability, create a sense of insecurity, which discourages her from using the sidewalk to access nearby services.

25.2. Another significant barrier that Mrs. Cynthia faces the lack of a ramp at the corner of the sidewalk located at Georgetti St., Vega Alta, PR 00692-7049, at coordinates 18.411752195309372, -66.33089730979468. The absence of a ramp at this corner prevents proper access to the sidewalk, as it forces Mrs. Cynthia to confront an insurmountable obstacle. Since she relies on her rollator walker to move, the lack of a ramp makes it impossible for her to access the sidewalk from this corner and navigate it safely and comfortably. This barrier also increases her risk of falling, as she cannot make a smooth transition between the street and the sidewalk. The absence of a ramp at the corner reinforces her sense of insecurity and, as a result, she feels even more discouraged from using the sidewalk and taking advantage of the services available in the area.

25.3. To improve the current situation, the sidewalk should be widened to provide enough space for the rollator walker, ensuring that it can be navigated safely without obstacles. This will allow for smoother and more secure movement. Additionally, the height of the sidewalk should be leveled to create a gradual transition, eliminating any sudden changes in elevation or steps that could increase the risk of tripping. The surface needs to be repaired to fill any cracks, and a non-slip coating should be applied to make the pavement stable and safe for those using assistive devices. The cracks must be sealed to prevent the walker wheels from getting caught, and the surface should be smooth, even, and free of any obstacles that might cause instability. For the corner without a ramp, a

properly designed ramp should be installed, following all the necessary guidelines, to allow easy access to the sidewalk. This will provide Mrs. Cynthia with a safe and seamless transition from the street to the sidewalk. Making these changes will allow Mrs. Cynthia to use the sidewalk confidently.

25.4. It is essential that the Municipality of Vega Alta actively addresses the physical barriers that hinder Mrs. Cynthia's mobility. To achieve this, the Municipality must implement a comprehensive plan to widen the sidewalk, removing any obstacles that could prevent the use of rollator walkers or other assistive devices. Additionally, it is crucial for the Municipality to repair the uneven surfaces and cracks present on the sidewalk, as these can cause dangerous tripping hazards and falls. The Municipality also has the responsibility to implement an appropriate ramp at the corner, allowing for obstacle-free access for individuals with limited mobility. By taking these measures, the Municipality will not only ensure compliance with local regulations but will also foster a more inclusive and equitable environment for all residents.

26. Mrs. Cynthia likes to be able to use the ramp located on Jose Vega Nevarez St., Vega Alta, PR 00692-7000, at coordinates 18.41183996395224, -66.33026807388642, as it is an alternative that facilitates her mobility and allows her to access the area with greater comfort and safety. However, since November 2024 she has been discouraged from using it due to the architectural barriers that prevent its proper use:

26.1. For someone like Mrs. Cynthia, who depends on her rollator walker, a well-designed ramp free of obstacles allows her to move more safely, reducing the risk of falls, dangerous accidents, and unnecessary physical strain. Being able to use this ramp also restores a sense of independence and confidence, as she has the ability to move around without constantly relying on the help of others, significantly improving her quality of life and emotional well-being. However, the presence of these architectural barriers remains an obstacle that prevents her from benefiting from this resource.

26.2. Resolving the present barriers means it is necessary to redesign it so that it aligns perpendicularly with the sidewalk, creating a smoother and safer transition. Additionally, the ramp should be leveled with an appropriate slope, following

accessibility standards, so that it is easy to use without excessive physical effort. Curbs or side guides should be incorporated to prevent the rollator walker from slipping off the ramp, ensuring that it remains stable and manageable. The surface of the ramp should be non-slip and free of bumps or irregularities, which would improve safety and comfort while walking. These adjustments would not only make the ramp more accessible but also reduce the risk of falls, improve Mrs. Cynthia's independence, and restore her confidence in using it safely without the worry of potential accidents.

26.3. According to accessibility regulations and the rights of people with disabilities, it is the responsibility of the Municipality of Vega Alta to ensure that ramps and pathways are properly designed and maintained, so they do not present physical barriers that limit mobility. The municipality must promote an inclusive and safe environment where all people can move freely and without the risk of accidents. The lack of proper measures in the city's infrastructure represents a violation of Mrs. Cynthia's right to full and unobstructed access to public spaces, which directly affects her quality of life and autonomy. Therefore, the Municipality of Vega Alta must take action to correct these deficiencies and ensure that its citizens have access to an accessible and safe environment.

27. For Mrs. Cynthia, using the sidewalk located on Jose Vega Nevarez St., Vega Alta, PR 00692-7000, from coordinates 18.411848269871903, -66.33027547635834 to coordinates 18.41216002089621, -66.33030967452275, is very important, as it represents a key route for her daily mobility, providing her with the opportunity to move more independently. However, since September 2024, she has been discouraged from using it due to the architectural barriers it presents, which she is very aware of. The barriers are:

27.1. The sidewalk located on José Vega Nevarez St., Vega Alta, PR 00692-7000, is too narrow, making it difficult for Mrs. Cynthia to navigate safely with her rollator walker, as there is very little space to maneuver. Additionally, the surface is uneven, with sections that are lower than others, creating an added challenge, as these irregularities can cause her walker to lose control and increase the risk of falls. There are also cracks in the pavement that could cause tripping or cause the rollator to get stuck, further complicating her movement. Mrs. Cynthia is aware of

these barriers, and due to her condition of Neuromyelitis Optica, which affects her coordination and muscle strength, these obstacles become significant challenges that worsen her ability to move safely and comfortably. These physical and emotional difficulties discourage her from using the sidewalk, as she feels insecure and overwhelmed by the risks, limiting her independence and mobility.

27.2. Resolving these barriers includes widening the sidewalk to provide more space for maneuvering with a rollator walker, ensuring there is enough room to move without obstacles. It is also necessary to repair the areas of the sidewalk and ensure that the entire pavement is level. This would eliminate the irregularities that hinder movement, reducing the risk of falls and helping maintain control of the rollator. Additionally, it is essential to repair the cracks in the pavement to prevent the rollator from getting stuck or causing trips. Using high-quality materials to ensure that the pavement is durable and safe for traffic is also important. If these measures are implemented, Mrs. Cynthia will be able to use the sidewalk.

27.3. The Municipality of Vega Alta has the legal and moral responsibility to ensure that all public infrastructure is accessible to everyone. According to accessibility laws and the rights of people with disabilities, the municipality must ensure that sidewalks, ramps, and pathways are properly designed, maintained, and repaired to provide a safe and accessible environment. This is not only a legal obligation but also a commitment to social inclusion and equal opportunities for all citizens, regardless of their physical conditions. Ensuring an accessible environment promotes autonomy, social inclusion, and the overall well-being of all the municipality's residents.

28. Mrs. Cynthia usually makes use of the ramps available in her community, including the one located on Jose Vega Nevarez St., Vega Alta, PR 00692-7000, at coordinates 18.41208367375866, -66.3303043101012, because ramps are essential for her mobility. Due to her condition of Neuromyelitis Optica, it is extremely difficult for her to overcome the high curbs with her rollator walker. The ramps provide a much safer and more comfortable alternative, allowing her to maintain control of her walker without the need for excessive physical effort or risking her stability. However, since September

2024, Mrs. Cynthia has been discouraged from using the ramp due to the architectural barriers present. Although the ramp represents a crucial alternative for her mobility, she has been unable to use it properly due to its poor design:

- 28.1. Mrs. Cynthia has identified several barriers in the ramp that make it difficult to use and directly affect her mobility. First, the ramp is poorly positioned, as it is not aligned perpendicularly with the sidewalk, forcing Mrs. Cynthia to turn uncomfortably when attempting to access it. This forced turn increases the risk of losing balance, which is particularly dangerous due to her condition of Neuromyelitis Optica. Additionally, the ramp is not located at an intersection, where access to the sidewalk is easier, but instead is situated in the middle of it, creating an uneven surface that hinders movement. This unevenness is especially challenging for Mrs. Cynthia, as it is difficult for her to maintain control of her rollator walker on irregular surfaces. Furthermore, the ramp lacks side borders or guides, increasing the risk of the walker slipping off the ramp, causing falls or loss of stability. These barriers not only affect her ability to use the ramp safely but also generate insecurity, demotivation, and fear of falling, making Mrs. Cynthia feels discouraged from using the ramp.
- 28.2. To address these barriers, first, the ramp should be repositioned to align perpendicularly with the sidewalk and, preferably, placed at an intersection to ensure smoother and safer access. This would eliminate the uncomfortable turn required and reduce the risk of losing balance. The surface of the ramp should also be leveled to eliminate any unevenness, which could make it difficult for Mrs. Cynthia to control her rollator walker, especially on irregular terrain. The pavement should be repaired, ensuring a smooth and stable surface that eliminates cracks or bumps. Additionally, side borders or guides should be installed along the ramp to provide clear boundaries and prevent the rollator from veering off the path. By making these changes, the ramp would become a reliable, accessible, and safe option for Mrs. Cynthia.
- 28.3. The municipality has a fundamental responsibility under the ADA, which requires that public infrastructures be accessible. Under this law, the municipality of Vega Alta must ensure that ramps, sidewalks, and other urban elements are properly

designed, built, and maintained to prevent architectural barriers that hinder access.

This includes ensuring that ramps are correctly located, functional, and free of obstacles, as required by the ADA. Additionally, the municipality must conduct regular inspections to detect and correct any deficiencies in the infrastructure that may put Mrs. Cynthia's mobility at risk. Complying with these regulations is not only a legal requirement but also a commitment to inclusion and the well-being of all residents, fostering a more accessible, safe, and equitable environment.

29. Accessing places such as churches, hair salons, and other community spaces is essential for Mrs. Cynthia, as it allows her to maintain her independence and actively participate in the social life of her community. The ramp located at 37 Jose Vega Nevarez St., Vega Alta, PR 00692-7000, at coordinates 18.412175926546936, -66.3303083334155, is an important tool for her mobility. However, since November 2024, Mrs. Cynthia has been discouraged from using the ramp due to the architectural barriers it presents. Although the ramp offers her an essential alternative for mobility, the existing barriers make it difficult to use it properly, causing her to feel insecure and concerned about her physical well-being.

- 29.1. Mrs. Cynthia has identified several barriers on the ramp located at 37 José Vega Nevarez St., Vega Alta, PR 00692-7000, which hinder its use and directly affect her mobility. The ramp is poorly positioned as it is not aligned perpendicular to the sidewalk, forcing her to make an uncomfortable turn when attempting to access it. This forced turn increases the risk of losing balance, which is particularly dangerous due to her condition of Neuromyelitis Optica, affecting her coordination and stability. Additionally, the ramp is bent, creating an uneven surface and making it harder for her to control her rollator walker. The lack of side guides on the ramp increases the risk of the walker veering off course, which could cause falls and jeopardize her safety. Lastly, the ramp has potholes, creating an unstable movement and increasing fatigue while trying to maintain control of the walker. These barriers have made Mrs. Cynthia feel insecure and demotivated to use the ramp, limiting her access to important services and places in her community.

- 29.2. Several solutions can be implemented to address the barriers of the ramp. The ramp should be repositioned to align perpendicularly with the sidewalk. This would eliminate the uncomfortable turn that forces Mrs. Cynthia to make when trying to access it. Additionally, the ramp needs to be repaired to eliminate any bends or deformations in its surface, for which the pavement should be leveled and smoothed to remove potholes, cracks, or unevenness that could cause unstable movements and increase fatigue when trying to maintain control of the walker. It is also essential to install side guides along the ramp. These elements would provide a clear boundary that would prevent the walker from slipping off the path. If these solutions are implemented, Mrs. Cynthia would love using the ramp.
- 29.3. According to the Americans with Disabilities Act (ADA), it is essential that ramps, sidewalks, and other access points are properly designed, maintained, and repaired to prevent any barriers that could hinder the mobility of people with disabilities. In the case of Mrs. Cynthia, the ramp must meet these standards for her to use it safely. This includes ensuring that the Municipality of Vega Alta makes sure the ramp is properly aligned with the sidewalk, that the surface is free from distortions or bumps, and that side guides are installed to prevent her walker from veering off track. The municipality has the responsibility to correct these deficiencies because only through the continuous improvement of public infrastructure can a more equitable and accessible community be achieved for all.
30. Mrs. Cynthia wishes to be able to use the sidewalk located at 37 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, from coordinates 18.412159384672695, -66.33032710888187 to coordinates 18.412104669227684, -66.33094334639534, in front of the Iglesia Recinto Biblico, as it provides her access to a place that is important for her social and spiritual life. The church represents an essential space for her participation in the community and religious activities, allowing her to maintain a connection with her surroundings and feel emotional support. Nonetheless, Mrs. Cynthia is discouraged from using this sidewalk due to the architectural barriers it presents.
- 30.1. Mrs. Cynthia has identified several barriers on the sidewalk in front of the Iglesia Recinto Bíblico that prevent her from using it safely. First, the sidewalk is too

narrow because the buildings occupy most of the available space, making it impossible for her to pass with her rollator walker. Additionally, the sidewalk has a considerable height, creating an elevated curb that is difficult to overcome, especially with a walker. Cracks and other obstacles along the way further increase the risk of falls and make it harder to control the walker. Due to her condition of Neuromyelitis Optica, which affects her coordination and stability, these barriers prevent her from moving safely. The height of the sidewalk and the irregularities in its surface make it physically impossible for Mrs. Cynthia to pass with her walker, even if she attempts it. For all these reasons, she feels discouraged and dissuaded from using this sidewalk.

30.2. In addition to the barriers on the sidewalk in front of Iglesia Recinto Bíblico, Mrs. Cynthia has also identified another obstacle at the corner of the sidewalk located at Gabriel Hernández St., Vega Alta, PR 00692-7017, at coordinates 18.412111667716378, -66.33095407523211. This intersection lacks a ramp, making it extremely difficult for her to safely navigate the corner with her rollator walker. Due to her condition of Neuromyelitis Optica, which impacts her coordination and stability, the absence of a ramp at this intersection significantly worsens her ability to move independently and safely. Without a ramp, Mrs. Cynthia has to attempt navigating a steep curb, which increases the risk of losing balance, falling, and sustaining injuries. The need for ramps at intersections is crucial for her mobility, as they provide the smooth and accessible transition she requires to safely move between sidewalks and roads. The lack of this feature at this intersection discourages her from using this route and limits her access to important areas in her community.

30.3. To address these barriers, the first and most important solution is the installation of a ramp at the entire intersection. In accordance with the standards of the Americans with Disabilities Act (ADA), these ramps must be properly designed to meet ADA requirements, ensuring they are wide enough to accommodate a rollator walker and have smooth, even surfaces free from cracks, potholes, or other irregularities that could hinder mobility. Additionally, the sidewalk in front of the Iglesia Recinto Bíblico should be widened to provide enough space for

Mrs. Cynthia to maneuver her walker comfortably. Any obstacles in the path, such as traffic signs or street furniture, should be removed or relocated to allow for unobstructed passage. It is also essential to repair cracks or uneven surfaces in the pavement to create a stable surface, ensuring a safe and protected path. Implementing these changes will significantly improve Mrs. Cynthia's ability to navigate independently and safely through the area.

30.4. It is essential that the Municipality of Vega Alta supervise and ensure that ramps are properly installed at the intersection and that all accessibility requirements are met. This includes verifying that the ramps are wide enough and free from any obstructions or irregularities that could hinder Mrs. Cynthia's mobility. Additionally, the Municipality must ensure the proper widening of the sidewalks, the repair of cracks and uneven surfaces, and the relocation of obstacles along the path. By ensuring these solutions are implemented, the Municipality would be promoting an accessible, safe, and inclusive environment.

31. The Plaza Gilberto Concepción de Gracia is a community space where Mrs. Cynthia can connect with others, and the nearby stores allow her to run essential errands, such as going to the pharmacy or enjoying a delicious cookie at Pistachio's. For this reason, she has intended to use the sidewalk located at Luis Muñoz Rivera St., Vega Alta, PR 00692-7000, from coordinates 18.412193817148804, -66.33023369717986 to coordinates 18.41233740623331, -66.32900177771074, in front of the Plaza Gilberto Concepción de Gracia, Farmacia Nueva Vega Alta, Pistachio's - LaBoutik de las Cookies and Parroquia La Inmaculada Concepción, in order to access these places. However, since October 2024, Mrs. Cynthia has been discouraged from using this sidewalk due to the architectural barriers it presents:

31.1. The sidewalk has several barriers that Mrs. Cynthia has identified, like is completely obstructed by vehicles that are parked in an undesignated area, preventing her from using it safely with her rollator walker. Due to this obstruction, Mrs. Cynthia is forced to take dangerous alternatives, such as walking on the street, exposing her to the risk of accidents with vehicles. Additionally, the sidewalk has potholes, creating an uneven surface that makes it even harder for her to maintain control of her walker, increasing the risk of falls.

These barriers make Mrs. Cynthia feel unsafe and discouraged from using the sidewalk, limiting her access to important places such as the pharmacy and the plaza, which are essential to her daily and social life.

31.2. She has also identified a barrier at the corner of the sidewalk located at Colón St., Vega Alta, PR 00692-7074, at coordinates 18.412334014749344, -66.3289756461645. The corner is problematic because it lacks an accessible ramp, and the intersection where the ramp should be is completely obstructed by parked cars. This makes it impossible for Mrs. Cynthia uses the sidewalk and safely navigates this area with her rollator walker, forcing her to take risky alternatives that could compromise her safety. For this reason, Mrs. Cynthia feels more discouraged from using the sidewalk.

31.3. The first step in addressing these barriers is to install an accessible ramp at the intersection of Colón Street in Vega Alta, which should be wide enough and equipped with smooth, level surfaces free of cracks, potholes, or irregularities that could hinder Mrs. Cynthia's mobility. Additionally, the intersection area should be cleared of any obstructions, such as parked cars, to ensure the path remains clear and accessible, which should also be applied to the sidewalk. To further enhance safety, the municipality could consider implementing clear signage indicating that parking is not allowed in these areas, along with severe penalties for those who violate this regulation, preventing future blockages. Implementing these changes would ensure that Mrs. Cynthia can use the sidewalk.

31.4. It is the responsibility of the municipality of Vega Alta to ensure that intersections and sidewalks are free from obstructions, such as improperly parked cars, which prevent the proper use of these pathways. Additionally, the municipality must conduct regular inspections to identify any potential issues with public infrastructure, such as cracks, potholes, or uneven surfaces, and promptly address them to prevent them from becoming a safety hazard for residents, especially for those like Mrs. Cynthia, who rely on accessibility to move safely. Therefore, the municipality must provide clear warning signs about illegal parking in areas where people with disabilities need access. While drivers must be responsible for not blocking these pathways, the municipality has the duty to enforce effective

penalties to ensure that accessibility standards are not violated, fostering a culture of accessibility and ensuring that both residents and visitors understand the importance of keeping public spaces accessible to everyone.

32. Being able to use the sidewalk located on Colón St., Vega Alta, PR 00692-7074, from coordinates 18.41231846963547, -66.32896813084206 to coordinates 18.411970453976707, -66.32893527378201, in front of the Parroquia La Inmaculada Concepción, is very important for Mrs. Cynthia, as it allows her to access the Parroquia La Inmaculada Concepción, a place fundamental to her spiritual and communal life. For her, churches are not only places of prayer but also centers of support and connection with others who share her beliefs and values. Therefore, being able to attend religious services provides her with a sense of belonging, hope, and inner peace. Additionally, this sidewalk connects her to other key areas of her neighborhood, making it easier for her to participate in social and religious activities. However, since October 2024, Mrs. Cynthia has been discouraged from using it due to the architectural barriers present, which make her feel unsafe and unmotivated to use the sidewalk:

- 32.1. Mrs. Cynthia has identified that the sidewalk is completely obstructed by illegally parked vehicles. Illegal parking on the sidewalk not only creates a physical obstruction but also poses a serious danger to Mrs. Cynthia. Although there is designated parking inside the parish, many drivers prefer to park on the sidewalk, blocking Mrs. Cynthia's path, who relies on a clear pathway to move safely. This irresponsible practice prevents Mrs. Cynthia from using the sidewalk properly, as her rollator cannot pass through the narrow space left by the parked vehicles. With the sidewalk being illegally occupied, Mrs. Cynthia is forced to find alternatives, such as walking in the street, which increases her risk of being hit by a car. This situation presents a significant risk for Mrs. Cynthia, as she uses a rollator to move, and the obstacles in her path make maneuvering difficult, putting her stability and safety in jeopardy. Furthermore, the extra effort she needs to exert to navigate these obstacles could cause fatigue and put her at even greater risk of losing control of her rollator, making her feel extremely unsafe and discouraged from continuing to use the sidewalk.

- 32.2. In the corner of that same sidewalk located at Colón St., Vega Alta, PR 00692-7074, at coordinates 18.411958909397928, -66.32893601039089, there is no designated ramp or any space allocated to transition from the street to the sidewalk. This lack of accessibility creates a significant barrier for Mrs. Cynthia, who depends on smooth, clear paths to safely navigate her surroundings using her rollator. Without a proper ramp, she faces additional difficulty and risk when attempting to cross from the street to the sidewalk, as there is no safe or practical way to do so. This absence of an accessible transition point further discourages her from using the sidewalk and limits her ability to move freely and independently in the area.
- 32.3. The sidewalk barriers must be addressed, and for this, it is crucial that measures are taken to prevent illegal parking on the sidewalk. The municipality must implement clear signs prohibiting parking in this area, along with penalties for those who violate the rule. Regarding the lack of a ramp, one should be installed, and it must comply with the ADA standards. Alternatively, spaces for safe transitions from the street to the sidewalk should be designated, without having to deal with high curbs or other obstacles. This will allow Mrs. Cynthia to access the sidewalk without problems and continue her way with ease.
- 32.4. The municipality of Vega Alta must take the initiative to enforce the laws, conduct regular inspections, and promote public awareness about the importance of accessibility. Therefore, it must ensure that sidewalks and intersections are free from obstructions, such as illegal parking, which pose a danger to pedestrians, in addition to ensuring accessibility and safety by implementing and maintaining accessible infrastructure, such as ramps and clear sidewalks.
33. The Plaza Gilberto Concepción de Gracia is a significant place for the citizens of Vega Alta, as it is named in honor of a representative figure of Puerto Rican cultural roots and expressions, with Vega Alta being his hometown. This plaza is a space where the community gathers to share, enjoy activities, and maintain a connection to their traditions. Additionally, nearby is the Parroquia La Inmaculada Concepción, a place of worship and spiritual support for many in the area. For Mrs. Cynthia, being able to access this space is crucial, as it allows her to actively participate in her community. The

sidewalk located at Luis Muñoz Rivera St., Vega Alta, PR 00692-7000, from coordinates 18.41195572826361, -66.32895277420182 to coordinates 18.411849571686595, -66.3301981532494, in front of the Plaza Gilberto Concepción de Gracia and Parroquia La Inmaculada Concepción, is the path that allows her to reach these important places. However, since November 2024, Mrs. Cynthia has been unable to use this sidewalk due to the architectural barriers present, which make her feel discriminated against.

33.1. The sidewalk is completely obstructed and Mrs. Cynthia knows this prevents her from using it safely. On the side of Plaza Gilberto Concepción de Gracia, the obstruction comes from streetlights that block the path, while on the side of Parroquia La Inmaculada Concepción, there are illegally parked vehicles. Often, drivers use the sidewalk as an unauthorized parking space, making it impossible for her to pass through safely. Since she relies on a rollator walker to move, these cars completely block her way, forcing her to maneuver around them or, in some cases, step onto the street to continue her journey. This illegal parking practice creates a critical barrier, as it not only physically obstructs her path but also presents an additional danger due to the lack of visibility and the need to navigate areas not designed for pedestrian traffic. Relying on a rollator walker, each of these obstacles represents a significant challenge. Her medical condition, Neuromyelitis Optica, affects her mobility and creates difficulties when trying to maneuver the walker in narrow, obstructed spaces. All of this creates a sense of insecurity and frustration, as Mrs. Cynthia depends on accessible pathways to participate actively in her community, which is why she feels discouraged from using the sidewalk.

33.2. To address the barriers on the sidewalk, it is necessary to ensure that the sidewalk is free of all obstructions, including street lamps and illegally parked vehicles. The street lamps that block the way must be relocated or adjusted to ensure that they do not obstruct the sidewalk. If relocation is not possible, additional lighting along the sidewalk can improve visibility while keeping the path free of obstacles. In the section near the Parroquia La Inmaculada Concepción, it is essential to promote the use of designated parking spaces for vehicles and clearly mark them as areas not intended for pedestrian passage.

33.3. This is the responsibility of the municipality of Vega Alta, which must also carry out regular inspections to ensure that the infrastructure remains clear and accessible, making it safer for Mrs. Cynthia to move through her community with confidence. By implementing these measures, the sidewalk will become accessible and safe for all pedestrians, especially those with mobility challenges, allowing Mrs. Cynthia to continue participating actively in her community and improving her quality of life.

34. The ramp located on Luis Muñoz Rivera St., Vega Alta, PR 00692-7000, at coordinates 18.411850349541723, -66.33019888544511, in front of the Plaza Gilberto Concepción de Gracia, is useful for providing access to this important public space. Plaza Gilberto Concepción de Gracia is a key place for the community of Vega Alta, where citizens gather, participate in activities, and maintain their connection to the town's traditions. For Mrs. Cynthia, being able to access the plaza is essential due to the importance of this space for her social and community life. However, due to the architectural barriers presented by the ramp, Mrs. Cynthia has been unable to use it since November 2024.

34.1. The ramp presents several architectural barriers that make access difficult for Mrs. Cynthia. She has identified that the ramp lacks edges, making it unsafe, and its surface is bent, causing instability when trying to maneuver. Additionally, the ramp has bumps that make it uneven and slippery. Due to her use of a rollator walker and her health condition, Neuromyelitis Optica, these barriers severely affect her ability to move safely. Walking on an uneven surface with bumps increases the risk of falling and difficulty maintaining control of the walker. The lack of edges on the ramp also raises concerns about stability while using it. These physical barriers not only affect her mobility but also increase the risk of fatigue and loss of balance. As a result, Mrs. Cynthia feels discouraged from attempting to use the ramp, as the current conditions do not provide the safety and confidence needed to access the space independently.

34.2. To address the barriers on the ramp, several key solutions must be implemented to ensure safe access for Mrs. Cynthia. Firstly, the ramp should be repaired to eliminate curves and irregularities, providing a smooth and stable surface. Ensuring that the ramp has proper edges will prevent the walker from veering off

the path, offering greater stability and safety when using the ramp. Furthermore, the potholes on the ramp should be fixed by resurfacing the ramp to create a smooth and level surface, free from hazards. It is also essential to ensure that the ramp complies with ADA (Americans with Disabilities Act) standards, including an appropriate slope for safe navigation. Regular maintenance should be scheduled to keep the ramp in good condition and prevent future deterioration. By making these improvements, Mrs. Cynthia will be able to use the ramp with confidence, allowing her to safely access Plaza Gilberto Concepción de Gracia and participate in community activities.

34.3. The municipality of Vega Alta has the fundamental responsibility of ensuring that its public spaces are accessible. This involves not only the initial construction of accessible infrastructure but also the ongoing maintenance of these structures to ensure they remain in optimal condition. In this case, the municipality must ensure that the ramp located on Luis Muñoz Rivera St., in front of Plaza Gilberto Concepción de Gracia, is repaired and maintained to meet the appropriate specifications and comply with the accessibility standards set by the Americans with Disabilities Act (ADA). Additionally, it is the municipality's responsibility to conduct regular inspections to identify any damage or deficiencies in the infrastructure that could become a barrier for people with disabilities. By taking these actions, the municipality would be fulfilling its duty to promote a safe, inclusive, and accessible environment.

35. The Plaza Gilberto Concepción de Gracia is a place of great importance for Mrs. Cynthia and for the community of Vega Alta in general. This plaza serves as a space where citizens can enjoy events, community activities, and celebrations that strengthen the collective identity of the town. The plaza is also a recreational center, a place where people can relax, connect with their neighbors, and participate in various initiatives that promote collective well-being. For Mrs. Cynthia, the plaza represents a site that allows her to feel a connection to her culture, a place where she can actively participate and find support in her surroundings. Additionally, the plaza's proximity to other important services and centers, such as the church and local businesses, makes it even more essential for her to be able to easily access this space. One way to access this plaza is by

using the sidewalk located on Jose Vega Nevarez St., Vega Alta, PR 00692-7000, from coordinates 18.411852827571035, -66.33021365658324 to coordinates 18.412158216327295, -66.33024584309045, in front of the Plaza Gilberto Concepción de Gracia, but Mrs. Cynthia has been unable to use it due to the architectural barriers present. Therefore, Mrs. Cynthia has not been able to enjoy this access since November 2024, which prevents her from benefiting from all that the plaza and its surroundings have to offer.

- 35.1. Mrs. Cynthia knows that the sidewalk near the Plaza Gilberto Concepción de Gracia is completely obstructed by structures of the plaza, such as decorations and architectural details that block her way. These obstacles are especially problematic for her, as she uses a rollator walker to move, and her health condition, Neuromyelitis Optica, causes muscle weakness and coordination difficulties, making it a considerable challenge to maneuver around these obstacles. The objects occupying the sidewalk force her to seek dangerous alternatives, such as walking on the street. The presence of these barriers greatly hinders her ability to move independently and safely, which makes her feel frustrated and insecure when trying to access the plaza. Due to these barriers, Mrs. Cynthia feels discouraged from going.
- 35.2. In addition to the obstacles already mentioned, there is a significant issue at the corner of the sidewalk located on Luis Muñoz Rivera St., Vega Alta, PR 00692-7000, at coordinates 18.412177369984303, -66.33024448299864, in front of the Plaza Gilberto Concepción de Gracia, where no ramp is present. The absence of a ramp is a critical barrier that directly impacts Mrs. Cynthia's ability to safely access this important public space. For her, who depend on mobility aids such as a rollator walker, ramps are not just a convenience; she is a necessity for safe and independent movement. Without this essential infrastructure, Mrs. Cynthia faces increased challenges, as she cannot easily transition from the street to the sidewalk, forcing her to find alternate, unsafe routes. This creates unnecessary risks, as she may have to navigate through the street, putting her in potential danger. The absence of a ramp goes beyond being an inconvenience—it

limits Mrs. Cynthia's ability to fully engage in her community, which she should have the right to do.

35.3. To address these barriers, the municipality must prioritize the installation of an appropriate ramp at the corner of the sidewalk. The ramp must meet accessibility standards, ensuring it has an adequate width, a gentle slope, and is free of any obstacles that may hinder movement. This infrastructure will provide Mrs. Cynthia with the ability to safely transition from the street to the sidewalk. Additionally, the municipality should conduct regular audits of public spaces to identify and address any similar accessibility issues, ensuring that all areas comply with accessibility standards. Furthermore, to address the sidewalk barriers obstructed by the infrastructure, the municipality of Vega Alta must take immediate action. It is essential to carry out a detailed review of the structures and decorations of the plaza to identify which elements are encroaching on the sidewalk. Once identified, these elements should be relocated or modified to ensure they do not block pedestrian access. Decorations, lampposts, or other structures should be installed in such a way that they do not interfere with pedestrian traffic, respecting the necessary margins for safe passage. Public awareness campaigns could also be implemented to educate the community about the importance of keeping accessible routes clear and avoiding blockages. By installing this ramp and ensuring its proper maintenance, the municipality would significantly improve Mrs. Cynthia's safety and independence without facing unnecessary barriers.

36. Mrs. Cynthia E. Concepción Bruno is a person with a disability who relies on a rollator walker for mobility. She regularly travels along 1st Street in the Municipality of Vega Alta to complete essential errands, including grocery shopping, attending medical appointments, and participating in social activities. Additionally, she frequently uses this route to access Puerto Rico Highway 2, a major avenue critical for her daily mobility. This route is also important to her as it provides access to places of personal interest, such as Christian Charismatic Church and Anibal Salon, which she wishes to visit as part of her community engagement. However, the accessibility barriers present on 1st Street have made traveling this route unsafe, hazardous, and in many sections, impossible,

discouraging her from using it regularly. This forced exclusion, resulting from the Municipality of Vega Alta's failure to provide accessible sidewalks, constitutes a direct violation of her rights, entitling her to seek enforcement of accessibility standards and the removal of discriminatory barriers:

- 36.1. The sidewalk on 1st Street, Vega Alta, PR 00692-0000, at coordinates 18.417871230094406, -66.31134006205637, before crossing towards Ópalo Street. Mrs. Concepción Bruno encountered a severely deteriorated sidewalk with multiple uneven surfaces and fractures, making mobility with her rollator walker extremely difficult. Overgrown vegetation significantly obstructs the passage, reducing the available pedestrian space and rendering it impossible for her to navigate. Additionally, illegal parking on the sidewalk entirely blocks pedestrian access, forcing her to seek alternative and unsafe routes. The absence of curb ramps at intersections connecting to Ópalo Street prevents her from safely accessing the sidewalk, exposing her to vehicular traffic and increasing the risk of accidents. The combination of these barriers makes it nearly impossible for her to traverse this section safely, as she is forced to navigate hazardous conditions that put her at risk of falling, increase her physical strain, and leave her without a viable pedestrian route.
- 36.2. The sidewalk on 1st Street, Vega Alta, PR 00692-0000, at coordinates 18.417415940583993, -66.31137995935318, before crossing towards 3rd Street, has vehicles parked in the middle of the sidewalk, obstructing her path and forcing her to walk on the roadway, directly exposing her to traffic. Additionally, the sidewalk has severe cracks and uneven surfaces, significantly increasing the risk of tripping and falling. Further, various objects obstructing the sidewalk made her mobility even more challenging, requiring constant maneuvering and increased physical exertion. The accumulation of these barriers makes it impossible for her to use this section safely, leaving her with no alternative but to avoid this area entirely due to the insecurity and physical strain involved in trying to navigate it.
- 36.3. The sidewalk on 1st Street, Vega Alta, PR 00692-6099 at coordinates 18.41613185630236, -66.31145911887053, in front of Guayacán Housing and

Christian Charismatic Church, has numerous potholes that make traveling with her rollator walker extremely difficult and dangerous. Illegally parked vehicles completely obstruct pedestrian passage, leaving her no choice but to walk on the street, increasing the likelihood of accidents. Additionally, overgrown vegetation drastically narrows the sidewalk, making safe passage impossible and increasing the risk of becoming trapped between obstacles. These barriers collectively compromise her balance and stability, requiring excessive effort to attempt to move through the area. The continued presence of these obstacles forces her to avoid this section, as it presents an unacceptable risk to her safety and mobility.

36.4. The sidewalk on 1st Street, Vega Alta, PR 00692-6099, at coordinates 18.414967775359244, -66.31044405160131, in front of Imprenta Dávila and Aníbal Salón, is entirely blocked by a large number of vehicles parked along the sidewalk, making it physically impossible for Mrs. Cynthia Concepción Bruno to pass using her rollator walker. The obstruction forces her to find an alternative path, which is not only inconvenient but also extremely unsafe given her mobility limitations. Additionally, ongoing construction in the middle of the sidewalk further restricts her ability to navigate the area, leaving no accessible pathway. The presence of potholes and uneven surfaces creates additional hazards, as her rollator walker requires a stable, even surface to ensure safe movement. Any attempt to traverse this section would require excessive physical effort, increasing her risk of fatigue, loss of balance, or sudden spasms, making it highly unsafe for her. The combination of these barriers forces her onto the road, directly exposing her to the dangers of heavy traffic. Given her condition, walking on the road is not only dangerous but also impractical, as she cannot quickly maneuver out of the way of oncoming vehicles. The complete absence of a safe, accessible route prevents her from moving independently, ultimately discouraging her from using this area for her essential activities, such as attending medical appointments or purchasing necessities.

37. As these barriers exist in public spaces under the jurisdiction of the Municipality of Vega Alta, the responsibility to ensure accessibility falls on the municipal administration. The Municipality's failure to repair and maintain sidewalks constitutes a violation of the

Americans with Disabilities Act (ADA) and other federal and local regulations that require public infrastructure to be accessible. To remedy these violations and ensure the right to accessibility for Mrs. Concepción Bruno and other individuals with disabilities, the Municipality must implement an immediate action plan, including repairing and leveling all sidewalks, constructing curb ramps at every intersection that meet accessibility standards, removing obstacles such as overgrown vegetation and construction materials blocking pedestrian pathways, enforcing strict penalties to prevent illegal parking on sidewalks, and establishing an ongoing maintenance program to ensure long-term compliance with accessibility requirements. Without the implementation of these measures, the Municipality of Vega Alta will continue failing to meet its legal obligations and perpetuating the exclusion of Mrs. Concepción Bruno and other individuals with mobility impairments, further justifying the necessity of this legal action to demand the enforcement of her rights to accessibility and free movement.

38. In June 2024, Mrs. Cynthia E. Concepción Bruno attempted to navigate the sidewalks of Street Ópalo in the Municipality of Vega Alta, an area of great personal significance due to the presence of key locations such as the Wesleyan Church of Vega Alta. As a resident who relies on safe pedestrian routes to access essential locations, she anticipated using these sidewalks regularly as part of her daily routine. However, the severe accessibility barriers she encountered along this route made traveling exceedingly difficult and unsafe, completely deterring her from using this path again. The presence of these obstacles, resulting from the Municipality's failure to maintain public sidewalks in compliance with accessibility laws, has effectively excluded Mrs. Concepción Bruno from an essential part of her community. The lack of proper infrastructure not only prevents her from safely traveling along this route but also denies her equal access, constituting a violation of her rights. Given the importance of this route for her daily activities, the barriers described below significantly impact her independence and ability to participate in fundamental aspects of community life. Barriers Found on Street Ópalo:

- 38.1. The sidewalk ramp located on Street Ópalo, Vega Alta, PR 00692-0000, at coordinates 18.41770608087836, -66.31126643460637, next to 1st Street, is the only available access to Street Ópalo. However, Mrs. Concepción Bruno encountered a major accessibility failure: the absence of curb ramps at both

corners of the intersection. The lack of these ramps prevents her from safely transitioning from the street to the sidewalk, forcing her to seek hazardous alternative routes or risk injury by attempting to maneuver her rollator walker over the curb.

38.2. The sidewalk on Street Ópalo, Vega Alta, PR 00692-0000, at coordinates 18.417706080878656, -66.31106091034462, before crossing towards Street Topacio, is significantly obstructed by overgrown vegetation, drastically reducing the available pedestrian space and making safe passage nearly impossible. Additionally, this section of the sidewalk is severely deteriorated, with potholes and uneven surfaces that create dangerous obstacles for pedestrians. Given Mrs. Cynthia's condition, these hazards pose an extreme challenge. The use of her rollator walker requires a stable and unobstructed surface, as any uneven terrain or sudden gaps can cause the device to tilt or become stuck, making movement difficult and unsafe. The effort required to navigate around overgrown vegetation and avoid potholes is physically exhausting for her, increasing her risk of losing balance, experiencing spasms, or falling. As a result, attempting to traverse this sidewalk is not only impractical but also places her in significant danger, completely dissuading her from using this route.

38.3. The sidewalk located on Street Topacio, Vega Alta, PR 00692-0000, at coordinates 18.417811690962576, -66.3107906777875, presents yet another critical barrier—vehicles illegally parked on the sidewalk, either fully or partially blocking pedestrian access. The complete obstruction forces her to step onto the roadway, an extremely dangerous maneuver given her mobility limitations. The presence of potholes in this area exacerbates the issue, making it even more treacherous for her to attempt safe passage. The physical effort required to navigate through or around these barriers leads to extreme fatigue and discomfort, making it impossible for her to use this sidewalk as a viable option for travel.

38.4. The sidewalk ramp located on Street Ópalo, Vega Alta, PR 00692-0000, at coordinates 18.417740963156835, -66.3107432582571, presents another instance of missing curb ramps at the next intersection, preventing her from safely transitioning onto the adjacent sidewalk.

- 38.5. The sidewalk located on Street Topacio, Vega Alta, PR 00692-0000, at coordinates 18.417732403431618, -66.3105571828068, is further compromised by additional illegally parked vehicles and uneven surfaces, which create significant mobility challenges. The combination of these factors results in an unstable walking environment, increasing the likelihood of losing balance and making safe passage unattainable. With no alternative accessible routes available, she is left with no choice but to avoid this area entirely, depriving her of access to an essential part of her community.
39. The responsibility for ensuring accessible public sidewalks falls on the Municipality of Vega Alta, which has neglected its obligation to maintain pedestrian routes in compliance with the ADA and other federal and local accessibility regulations. To correct these violations and restore equal access for individuals with disabilities, the Municipality must implement an immediate remediation plan that includes installing properly designed curb ramps at all intersections, clearing obstructive vegetation from pedestrian pathways, repairing and leveling all damaged sidewalks to eliminate potholes and uneven surfaces, enforcing strict penalties against illegal parking on sidewalks to ensure unobstructed pedestrian movement, and establishing a long-term maintenance program to prevent recurring accessibility failures. The continued inaction by the Municipality perpetuates the exclusion of individuals like Mrs. Concepción Bruno, further justifying the need for legal action to demand compliance with accessibility laws and ensure that she and other individuals with mobility impairments can safely and independently navigate their community.
40. In December 2024, Mrs. Cynthia E. Concepción Bruno attempted to navigate the sidewalks of Streets 3 and 4 in the Municipality of Vega Alta, motivated by her interest in visiting significant locations such as the Santa Ana Parish and the Miguel Curbelo Community Center. These spaces are not only fundamental for her religious and social activities but also serve as key places where she engages with her community. For Mrs. Concepción Bruno, being able to move independently to these locations is essential for her well-being and social participation. However, the conditions of these streets and the numerous accessibility barriers she encountered during her journey made her transit extremely difficult and unsafe. The presence of these obstacles not only prevented her

from moving freely but also discouraged her from attempting to use these streets again, directly impacting her right to move safely and independently. The Municipality's failure to provide accessible sidewalks in this area constitutes a clear violation of the Americans with Disabilities Act (ADA), depriving her of equitable access to public spaces and full participation in her community. Given the importance of these streets for her daily mobility, the deficiencies described below represent a severe limitation on her autonomy and quality of life. Barriers Found on Streets 3 and 4:

- 40.1. The sidewalk ramp located on Street 3, Vega Alta, PR 00692-0000, at coordinates 18.417149604357892, -66.31132656330452, in front of 1st Street, presents a severe accessibility issue, as neither of the sidewalks at this intersection has ramps to facilitate the transition between the road and the sidewalk. This lack of adequate infrastructure prevents Mrs. Concepción Bruno from moving safely, forcing her to seek dangerous alternative routes or to exert excessive physical effort to overcome the elevated curbs with her rollator walker.
- 40.2. The sidewalk ramp located on Street 3, Vega Alta, PR 00692-0000, at coordinates 18.415860623713876, -66.31006618076717, in front of 2nd Street, is completely inadequate for a person with mobility limitations like Mrs. Cynthia. The absence of ramps on both sidewalks creates a significant barrier, forcing her to either navigate an unsafe drop or attempt to find an alternative, which is physically demanding and exhausting given her condition. Additionally, at one of these corners, illegally parked vehicles completely block access, leaving her stranded without a safe way to continue. As a person who relies on a rollator walker, she cannot simply step over curbs or maneuver through tight, obstructed spaces. Attempting to navigate these conditions not only increases her risk of falling but also places undue strain on her body, exacerbating her muscle weakness and coordination difficulties. Consequently, these barriers make it impossible for her to use this route safely, effectively cutting off her access to essential services and daily activities.
- 40.3. The sidewalk on Street 3, Vega Alta, PR 00692-0000, at coordinates 18.417152691689562, -66.3111212663913, before crossing towards 4th Street, is completely obstructed by vehicles parked along the entire sidewalk, entirely

blocking her passage. Additionally, the sidewalk has uneven surfaces and potholes, which pose a significant risk to her stability and mobility. These obstacles not only make it difficult for her to move without the risk of tripping or falling but also increase her fatigue and discomfort, making it nearly impossible for her to continue her route without exposing herself to danger.

40.4. The sidewalk ramp located on Street 4, Vega Alta, PR 00692-0000, at coordinates 18.417041592396178, -66.31088924687762, is missing, presenting another critical barrier to her mobility. The lack of a proper transition between these streets means that Mrs. Concepción Bruno cannot continue her route without being forced to navigate dangerous inclines, increasing her risk of falls and injuries.

40.5. The sidewalk on Street 4, Vega Alta, PR 00692-0000, at coordinates 18.41691944042576, -66.31088656466855, is in deplorable condition, with visible signs of wear, fractures, potholes, and uneven surfaces that make it difficult for any person with mobility impairments to pass through. Furthermore, residents of this area use the sidewalk to park their vehicles, completely or partially obstructing the path. This illegal practice forces Mrs. Concepción Bruno to detour into the roadway, exposing her to vehicular traffic and significantly increasing the risk of an accident. Additionally, uncontrolled vegetation invades the sidewalk, further reducing the available space and making safe transit even more challenging.

40.6. The sidewalk on Street 3, Vega Alta, PR 00692-6602, at coordinates 18.417087399362718, -66.31048155109686, in front of Rafael Hernández School, presents a continuation of the accessibility issues, as vehicles parked along the sidewalk completely block her passage, once again forcing her to move onto the roadway. The sidewalk surface is in poor condition, further exacerbating her difficulty in navigating safely. In front of Rafael Hernández School and Santa Ana Parish, where a parking lot is located, the sidewalk is in precarious condition, with visible structural damage. The ramp in this area is severely worn, making access even more challenging.

- 40.7. The sidewalk on Street 3, Vega Alta, PR 00692-0000, at coordinates 18.416175928646883, -66.31024174891971, is obstructed by uncontrolled vegetation, further reducing accessibility and forcing Mrs. Concepción Bruno to exert additional effort to navigate. This situation deprives her of her right to move freely and access places of importance in her community.
41. The Municipality of Vega Alta is responsible for ensuring that sidewalks and public spaces comply with accessibility standards established under the ADA and other federal and local regulations. However, its lack of action has perpetuated the exclusion of individuals with mobility impairments, preventing their free movement through these streets. To correct these violations and restore accessibility rights for Mrs. Concepción Bruno and other individuals with disabilities, the Municipality must implement an immediate action plan that includes installing ramps at all intersections, removing obstacles such as illegally parked vehicles and overgrown vegetation, repairing and leveling all sidewalks to eliminate potholes and dangerous uneven surfaces, and enforcing strict penalties against those who violate accessibility regulations. Additionally, it is essential to establish a continuous maintenance program to ensure that accessibility conditions are maintained in the long term. The Municipality's continued inaction severely impacts Mrs. Concepción Bruno's mobility, further justifying the necessity of this legal action to demand compliance with accessibility laws and to ensure her safety and autonomy in her community.
42. In April 2024, Mrs. Cynthia E. Concepción Bruno attempted to navigate the sidewalks of Streets 2, 8, and 9 in the Municipality of Vega Alta, as these streets provide access to various establishments essential for her daily life. This area includes businesses such as Santa Ana Mini Market & Bakery, where she can purchase basic necessities, restaurants like Pinchos al Carbón, and personal care services such as Elite Brows & Spa. These streets are a crucial part of her ability to run errands independently and actively participate in her community. However, upon attempting to navigate these routes, she encountered numerous architectural barriers that obstructed her mobility, significantly restricting her right to move freely and safely. These deficiencies in pedestrian infrastructure not only pose a serious risk to her physical well-being but have also deterred her from attempting to use these streets again, directly impacting her

independence and access to basic goods and services. The lack of accessibility on these streets reflects a failure by the Municipality of Vega Alta to fulfill its obligation to ensure safe mobility for all individuals, particularly those with disabilities, constituting a direct violation of the Americans with Disabilities Act (ADA). Barriers Found on Streets 2, 8, and 9:

43. The sidewalk ramp located on Street 2, Vega Alta, PR 00692-6083, at coordinates 18.415264185810614, -66.31065895232759, next to 1st Street, presents a severe accessibility issue, as none of the corners at this intersection have ramps that would allow for a safe transition onto the sidewalk. This omission forces Mrs. Concepción Bruno to maneuver her rollator walker under unsafe conditions, increasing her risk of falling or requiring her to seek alternative, equally hazardous routes. The inability to access the sidewalk from this entry point complicates her ability to complete daily activities and effectively excludes her from using this street in a safe manner.
44. The sidewalk located on Street 2, Vega Alta, PR 00692-6083, at coordinates 18.415625785186474, -66.3101853861802, in front of NW Bilingual Academy, presents another significant obstacle. Before reaching the intersection with Street 8, Mrs. Concepción Bruno encountered vehicles illegally parked along the sidewalk, entirely obstructing pedestrian passage. Due to this improper use of the sidewalk, she was left with no option but to walk along the roadway, exposing her to vehicular traffic and significantly increasing the risk of an accident. Additionally, both sidewalks contain potholes, fractures, and uneven surfaces that make navigating with a rollator walker extremely difficult, increasing the likelihood of tripping or losing balance. The presence of overgrown vegetation further narrows the pedestrian path, forcing her to exert unnecessary physical effort to continue her journey.
45. The sidewalk located on Street 8, Vega Alta, PR 00692-0000, at coordinates 18.415967330798317, -66.30908589178226, in front of Street 2, presents multiple accessibility challenges that severely impact Mrs. Cynthia Concepción Bruno's ability to navigate the area safely. Overgrown vegetation encroaching onto the sidewalk has drastically reduced the available space, creating an impassable barrier for someone who relies on a rollator walker. The limited space forces her to maneuver in a way that is physically exhausting and unsafe, increasing her risk of losing balance or becoming

stuck. Additionally, the presence of potholes and fractures along the sidewalk further jeopardizes her stability, as her rollator walker requires a flat and even surface to function properly. The pronounced slopes on this street amplify these challenges, making it exceedingly difficult for her to move without excessive strain, exacerbating her fatigue, muscle weakness, and coordination difficulties. Furthermore, illegally parked vehicles along the entirety of Street 8 obstruct pedestrian access, eliminating any viable route for her to continue safely. As a result, Mrs. Concepción Bruno is effectively denied access to this sidewalk, forcing her to avoid the area entirely due to the serious risks it presents to her safety and well-being.

46. The sidewalk located on Street 9, Vega Alta, PR 00692-0000, at coordinates 18.414993158414024, -66.30885813079452, in front of Street 8, is entirely obstructed due to a construction project occupying the entire pedestrian path, making it impossible for her to pass. Her only alternative was to move onto the roadway, exposing her to unacceptable risks. Additionally, overgrown vegetation in this area has significantly reduced the width of the sidewalk, making safe passage even more difficult. At this same intersection, illegally parked vehicles completely block the sidewalk, leaving her with no accessible or safe route to continue her mobility.
47. The Municipality of Vega Alta is legally responsible for ensuring that public sidewalks meet the accessibility standards set forth by the ADA and other applicable regulations. However, its failure to maintain and adapt the sidewalks on these streets demonstrates a clear neglect of its obligations. To correct these deficiencies and restore the right to safe mobility for Mrs. Concepción Bruno and others with disabilities, the Municipality must immediately implement a plan of action, which should include the installation of curb ramps at all intersections, the removal of obstacles such as illegally parked vehicles and encroaching vegetation, the repair and leveling of all sidewalks to eliminate potholes and fractures, and the enforcement of strict penalties against those who violate accessibility regulations. Additionally, a continuous maintenance program must be established to ensure that accessibility conditions are preserved over time and do not deteriorate again. The Municipality's continued inaction severely limits Mrs. Concepción Bruno's mobility, further justifying the necessity of this legal action to demand compliance with accessibility laws and to ensure her safety and independence within her community.

48. With the intention of running daily errands and visiting locations such as Panadería Santa Ana, Mrs. Cynthia E. Concepción Bruno attempted to navigate the sidewalks of Streets 5 and 7 in the Municipality of Vega Alta. These streets serve as a key point for her mobility, allowing her access to essential businesses and services necessary for her daily life. However, as she attempted to traverse these areas, she encountered multiple obstacles that made her movement extremely difficult and unsafe. The lack of accessible infrastructure prevents her from moving independently and securely, limiting her ability to reach basic goods and services and restricting her participation in community life. The Municipality of Vega Alta's failure to maintain and adapt these sidewalks constitutes a clear violation of the Americans with Disabilities Act (ADA), directly impacting her right to mobility and creating unnecessary exclusion. Given the importance of these routes in her daily routine, the barriers described below severely hinder her autonomy and well-being. Barriers Found on Streets 5 and 7:

- 48.1. The sidewalk ramp located on Street 5, Vega Alta, PR 00692-6099, at coordinates 18.41488501321064, -66.31022305529015, in front of Panadería Santa Ana, presents a severe accessibility issue, as neither of the sidewalks at this intersection has ramps to facilitate safe passage. This deficiency forces Mrs. Concepción Bruno to make dangerous maneuvers with her rollator walker, attempting to navigate curbs that pose a high risk of falls or injuries. Additionally, the corner of this intersection is occupied by illegally parked vehicles, completely blocking access to the sidewalk and forcing her onto the roadway, significantly increasing the danger of an accident.
- 48.2. The sidewalk located on Street 5, Vega Alta, PR 00692-0000, at coordinates 18.414998259611203, -66.3101016853333, before reaching Street 7, presents further challenges. Along the initial stretch of Street 5, Mrs. Concepción Bruno encountered vehicles parked directly on the sidewalk, significantly reducing the available pedestrian space. This situation once again forced her onto the street, increasing her exposure to traffic. Furthermore, the sidewalks in this section are extremely narrow and in poor condition, with cracks and uneven surfaces that make navigating with a rollator walker extremely challenging. These conditions turn every step into a difficult task, increasing fatigue and the risk of tripping.

- 48.3. The sidewalk located on Street 7, Vega Alta, PR 00692-0000, at coordinates 18.41591653122321, -66.30963664746626, in front of 2nd Street, presents significant obstacles that severely limit Mrs. Cynthia Concepción Bruno's ability to navigate the area safely. The initial stretch of Street 7 is particularly narrow, leaving little to no room for maneuvering with a rollator walker, forcing her into unsafe and uncomfortable positions. The pavement is in poor condition, with cracks and an uneven surface that make it extremely difficult for her to maintain balance and control over her mobility device. Given that her condition affects her muscle coordination and strength, even small irregularities in the pavement pose a serious risk of her walker becoming stuck or tilting unexpectedly, increasing the likelihood of falls and potential injuries. Additionally, the sloped surfaces along this stretch add another layer of difficulty, requiring significant physical effort that quickly leads to fatigue and discomfort. As a result, this sidewalk is effectively inaccessible to her, forcing her to avoid it altogether due to the dangerous conditions it presents.
- 48.4. The sidewalk located on Street 7, Vega Alta, PR 00692-0000, at coordinates 18.415627346358637, -66.30963137158706, is riddled with potholes, uneven surfaces, and fractures that make it nearly impossible to navigate. Each crack and depression poses a hazardous obstacle for Mrs. Concepción Bruno, who must exert extra effort to move without losing balance or suffering an injury. The lack of proper sidewalk maintenance has turned this street into an inaccessible and dangerous environment for individuals with mobility impairments.
- 48.5. The sidewalk located on Street 7, Vega Alta, PR 00692-0000, at coordinates 18.41546831395374, -66.3096323138131, in front of Street 5, presents an ongoing issue with illegally parked vehicles blocking the sidewalks, leaving Mrs. Concepción Bruno with no choice but to move onto the street to continue her route. This situation directly exposes her to traffic, greatly increasing the likelihood of an accident. Furthermore, uncontrolled vegetation encroaches upon the sidewalks, further narrowing the already limited pedestrian space and making her movement even more challenging. The combination of these factors renders this street completely inaccessible for a person with a disability.

49. The Municipality of Vega Alta is responsible for ensuring that public spaces remain accessible and that individuals with mobility impairments can navigate them safely. However, its failure to address these deficiencies has created an environment of discrimination, marginalizing those who rely on accessible sidewalks. Immediate corrective action is necessary to bring these streets into compliance with ADA requirements. To improve conditions in these areas, the Municipality must implement a comprehensive accessibility plan that includes installing properly designed curb ramps at all intersections, removing obstacles such as illegally parked vehicles and overgrown vegetation, reconstructing and maintaining sidewalks to eliminate potholes, cracks, and uneven surfaces, and establishing enforcement mechanisms to prevent these barriers from reoccurring. Additionally, a monitoring program must be put in place with effective penalties for those who misuse sidewalks, ensuring that public infrastructure remains accessible to all residents. The Municipality's continued failure to act perpetuates discrimination and exclusion, making it imperative to take immediate and effective action to guarantee that Mrs. Concepción Bruno and other residents can navigate their community safely and with dignity.
50. Since the opening of the Vega Alta Multifunctional Park, Mrs. Cynthia E. Concepción Bruno has shown great interest in this space, as it represents an innovative and essential place within the community. This park promotes recreation and social interaction, becoming a gathering point for many residents. However, the sidewalk located on Gabriel Hernández Street, Vega Alta, PR 00692-0000, at coordinates 18.414447893310754, -66.3313958579274, surrounding the park, presents a significant obstacle to her mobility. The lack of accessibility has prevented her from safely navigating the area, exposing her to conditions that compromise her independence and well-being. As a result of this situation, Mrs. Cynthia feels discouraged from returning, as the lack of accessibility has led to a discriminatory experience. Her last visit to this area was in February 2025, and in all the previous months, including throughout 2024, she frequented the area regularly. Mrs. Cynthia has personally identified the barriers in this location, which include:
- 50.1. During a previous attempt to navigate the area, Mrs. Cynthia E. Concepción Bruno struggled significantly due to the absence of access ramps, which prevented her from transitioning safely between the street and the sidewalk.

Without a proper ramp, she was forced to find an alternative way to continue her route, requiring dangerous maneuvers with her rollator walker. The lack of a smooth and accessible path caused her to lose her balance multiple times, making her feel vulnerable and unsafe while trying to move through the area.

50.2. Additionally, the cracked and pothole-filled ground made the situation even worse. While attempting to navigate the uneven surface, she stumbled several times, forcing her to exert extra effort to stabilize herself and avoid falling. The constant jarring motion as her walker hit cracks and dips in the pavement caused her physical strain, worsening her discomfort and making it painful and exhausting to continue forward. These hazardous conditions severely limited her ability to access the park and other important community spaces in Vega Alta, ultimately discouraging her from attempting to move through the area again.

50.3. The Municipality of Vega Alta has the obligation to maintain accessibility in public spaces, such as the sidewalk located on Gabriel Hernández Street, Vega Alta, PR 00692-0000, at coordinates 18.414447893310754, -66.3313958579274, near Vega Alta Multifunctional Park. The lack of a properly maintained and accessible sidewalk in this area severely affects Mrs. Cynthia E. Concepción Bruno's mobility, putting her in dangerous situations that compromise her safety. To ensure accessibility in the area and allow Mrs. Cynthia, along with other residents, to move safely and independently, the Municipality must take immediate action to improve and maintain the pedestrian infrastructure in optimal conditions, removing obstacles and risks.

50.4. To effectively eliminate these barriers and ensure Mrs. Cynthia E. Concepción Bruno can navigate the area safely, the Municipality of Vega Alta must prioritize the construction of an adequate sidewalk with a smooth, even surface, free from cracks and potholes in the area of Gabriel Hernández St., Vega Alta, PR 00692-0000 at coordinates 18.414447893310754, -66.3313958579274, around the Vega Alta Multifunctional Park. The implementation of accessible curb ramps at all crossings is essential to provide a seamless transition between the sidewalk and the street, preventing the need for unsafe maneuvers that put individuals with mobility impairments at risk. These ramps should be designed in compliance with

accessibility standards, ensuring they have a proper slope, non-slip surfaces, and side protection to enhance stability. Additionally, a structured and consistent maintenance program must be established to repair damages promptly and prevent the sidewalks from deteriorating again. By implementing these solutions, the Municipality of Vega Alta would create a safer, more inclusive environment, allowing Mrs. Cynthia and others with disabilities to move freely and access essential community spaces without unnecessary obstacles.

51. Mrs. Cynthia E. Concepción Bruno enjoys visiting Héctor Flores Passive Park, a space that offers her tranquility and opportunities for community interaction. This park serves as a recreational and leisure area, accessible to all residents. However, the sidewalk located on Jaime Acosta Street, Vega Alta, PR 00692-0000, at coordinates 18.41329762999998, -66.3306895491856, in front of the park, hinders her mobility, affecting her ability to move safely. The lack of accessibility in this area has led her to face situations that put her stability at risk and compromise her right to move freely. Due to these conditions, Mrs. Cynthia feels discouraged from returning, as she cannot navigate the area without facing obstacles that affect her safety and autonomy. Her last visit was in February 2025, and in all the previous months, including throughout 2024, she frequented the area. Mrs. Cynthia has personally identified the barriers in this location, which include:

- 51.1. During a previous attempt to navigate the area, Mrs. Cynthia E. Concepción Bruno encountered narrow and constricted sidewalks on Street Jaime Acosta, making it extremely difficult for her to move safely with her rollator walker. Due to her mobility limitations, she requires ample space to maneuver, but the sidewalks were too tight, forcing her to adjust her steps constantly and struggle to keep her balance. This lack of adequate space caused her to feel physically strained and fatigued, as she had to exert extra effort to ensure her walker remained stable while navigating such a confined area. The added difficulty of avoiding obstacles within this restricted space made the experience frustrating and exhausting.

- 51.2. Additionally, when she reached the street corners, she discovered that there were no proper ramps, leaving her unable to descend smoothly onto the road. Instead,

she was forced to stop and assess how to manage the curb, an obstacle that her rollator walker is not designed to handle safely. With her condition affecting her coordination and muscle control, stepping down unevenly from the sidewalk was particularly risky, increasing her chances of losing balance or tripping. The lack of curb ramps left her with no safe transition, making her feel insecure and discouraged from attempting to traverse the area again.

- 51.3. It is the responsibility of the Municipality of Vega Alta to ensure accessibility in public spaces, such as the sidewalk on Jaime Acosta Street, Vega Alta, PR 00692-0000, at coordinates 18.41329762999998, -66.3306895491856, in front of Héctor Flores Passive Park. The lack of proper maintenance of this sidewalk not only affects Mrs. Cynthia E. Concepción Bruno's mobility but also limits her ability to access important community spaces. Without safe pedestrian infrastructure, individuals with reduced mobility are forced to navigate dangerous conditions, increasing the risk of accidents. It is crucial for the Municipality to implement urgent corrective measures to eliminate these barriers and ensure that Mrs. Cynthia and other residents can move safely and without obstacles.
- 51.4. To ensure Mrs. Cynthia E. Concepción Bruno and other individuals with mobility impairments can navigate the area safely and independently, the Municipality of Vega Alta must implement critical accessibility improvements. First, the sidewalks must be widened to provide enough space for individuals using mobility aids, such as rollator walkers, ensuring they can move comfortably without restriction. Additionally, the installation of properly designed curb ramps at all intersections is essential to facilitate smooth and safe transitions between the sidewalk and the street. These ramps should comply with accessibility standards, featuring a gradual slope and a stable, slip-resistant surface to prevent falls. Lastly, a consistent maintenance program should be established to ensure sidewalks remain in good condition, free from cracks, uneven surfaces, or obstructions. By addressing these issues, the Municipality of Vega Alta can remove the existing barriers and create a safer, more inclusive environment that allows Mrs. Cynthia to navigate the area with confidence and independence.

52. The area near 17 Jacinto Seijo Street, Vega Alta, PR 00692-0000, is a place that Mrs. Cynthia E. Concepción Bruno has regularly visited for a long time, including every month throughout 2024. This area includes important community spaces such as Héctor Flores Passive Park and the Veterans Plaza, places that are of great interest to her. She values Héctor Flores Passive Park as a peaceful space for relaxation and social interaction, and she enjoys visiting Veterans Plaza for its historical and cultural significance in honoring those who have served. However, the sidewalk at 17 Jacinto Seijo Street, at coordinates 18.412948947984873, -66.32975152145653, located in front of Escuela Urbana Elemental, presents a barrier to her mobility. The lack of accessibility in this area prevents her from moving safely, making her feel discouraged from returning, as she faces conditions that limit her right to move freely. Her last visit to this area was in February 2025, and in all the previous months, including throughout 2024, she frequented the area consistently. Mrs. Cynthia has personally identified the barriers in this location, which include:

- 52.1. During her attempts to move through Street 17 Jacinto Seijo Street, Vega Alta, PR 00692-0000 Mrs. Cynthia E. Concepción Bruno struggled significantly due to the narrow sidewalks, which barely provided enough space for her rollator walker. Given her need for stability and space to maneuver, these confined paths forced her to walk cautiously and adjust her steps constantly, making her movement slow and physically demanding. The lack of room to navigate made it especially difficult for her to turn or reposition her walker, increasing her discomfort and sense of insecurity. With limited space to move freely, she felt trapped and vulnerable, as any misstep could cause her to lose balance, further complicating her ability to travel independently.
- 52.2. As Mrs. Cynthia navigated the area, she frequently encountered cracks, uneven surfaces, and potholes, which made it nearly impossible to maintain smooth and stable movement with her rollator walker. Every bump and dip in the pavement caused her device to jolt unexpectedly, forcing her to exert extra effort to stabilize herself. Due to her difficulty with muscle control and coordination, these sudden interruptions in her movement significantly increased her risk of stumbling or falling. The strain of navigating such a hazardous path left her physically fatigued

and discouraged, as she knew that each trip through the area would result in exhaustion and unnecessary discomfort. These barriers not only posed a physical danger but also diminished her confidence in moving through the community safely.

52.3. The Municipality of Vega Alta has a duty to guarantee accessibility in public spaces, including the sidewalk on 17 Jacinto Seijo Street, Vega Alta, PR 00692-0000 at coordinates 18.412948947984873, -66.32975152145653, located in front of the Héctor Flores Passive Park. The absence of a properly maintained and accessible sidewalk not only hinders Mrs. Cynthia E. Concepción Bruno's mobility but also limits her ability to access essential community spaces. Without safe pedestrian infrastructure, individuals with mobility impairments are forced to navigate unsafe conditions that increase their risk of injury. To uphold accessibility standards and ensure Mrs. Cynthia's right to move safely and independently, it is essential that the municipality implements immediate corrective measures to eliminate these barriers and create a truly inclusive environment.

52.4. To ensure Mrs. Cynthia E. Concepción Bruno can navigate 17 Jacinto Seijo Street, Vega Alta, PR 00692-0000 safely and independently, the Municipality of Vega Alta must implement essential accessibility improvements. First, the sidewalks must be widened to provide adequate space for individuals using mobility aids, ensuring that Mrs. Cynthia can maneuver her rollator walker comfortably without feeling restricted or at risk of losing balance. Additionally, the pavement must be resurfaced and leveled to eliminate cracks, potholes, and uneven surfaces that create hazardous interruptions in movement. A smooth and stable walking path is crucial to preventing unnecessary jolts that could compromise her stability and increase her risk of falling. The municipality should also establish a regular maintenance plan to promptly repair any future deterioration, ensuring that sidewalks remain safe and accessible for individuals with mobility impairments. By addressing these issues, the Municipality of Vega Alta would create a more inclusive environment where Mrs. Cynthia and other residents can move freely, without unnecessary physical strain or fear of injury.

53. The sidewalk on Jacinto Seijo Street, Vega Alta, PR 00692-0000, at coordinates 18.412993661587677, -66.32942823290983, is located near Escuela Urbana Elemental, Héctor Flores Passive Park, and Veterans Plaza, spaces that are integral to community life and that Mrs. Cynthia E. Concepción Bruno has regularly visited every month, including throughout 2024. However, the lack of accessibility on this sidewalk affects her mobility and exposes her to conditions that make independent movement difficult. These challenges have made her feel discouraged from returning to the area, as she cannot move safely or enjoy these spaces like anyone else. Her last visit was in February 2025, and in all the previous months, she frequented this area consistently. Mrs. Cynthia has personally identified the barriers in this location, which include:

53.1. During one of her attempts to navigate Jacinto Seijo Street, Vega Alta, PR 00692-0000, Mrs. Cynthia E. Concepción Bruno struggled significantly due to the deteriorated condition of the sidewalks. The surface was filled with cracks, uneven patches, and loose debris, making it extremely difficult for her to maintain stability while using her rollator walker. As she moved forward, the walker's wheels frequently got caught in the cracks, causing sudden jolts that forced her to exert extra effort to regain her balance. Given her difficulty with muscle coordination and control, this constant instability not only made her feel unsafe and exhausted but also increased her risk of falling. The rough terrain forced her to slow down considerably, turning what should have been a simple route into a physically demanding and frustrating ordeal.

53.2. As Mrs. Cynthia tried to move along the sidewalk, she encountered traffic signs positioned in the middle of the pedestrian path, completely blocking her way. Given the narrow width of the sidewalk, she had no choice but to stop and figure out how to get around the obstruction, which was especially challenging with her rollator walker. Since her device requires a stable and clear path, trying to maneuver around the signs meant stepping onto uneven ground or adjusting her walker in ways that compromised her balance. The lack of space forced her to make uncomfortable and risky movements, which caused her additional physical strain and frustration. At one point, the limited clearance left her unable to pass

through safely, making her feel trapped and disheartened by the inaccessibility of the area.

53.3. While navigating Street Jacinto Seijo, Mrs. Cynthia also struggled with the extremely narrow sidewalks, which provided very little room for her rollator walker. As she moved forward, she found herself constantly adjusting her position, trying to avoid scraping against walls, poles, and other obstacles. The lack of adequate space made even basic movements—such as turning her walker or repositioning herself—difficult and uncomfortable. Her reduced mobility made it physically taxing to stay within such a confined space, forcing her to exert extra effort just to avoid losing her balance. The narrow design of the sidewalk left her feeling restricted and unsafe, making her question whether she could navigate the area without putting herself at risk.

53.4. When she reached the intersection at coordinates 18.412959840080465, -66.32967087794714, Mrs. Cynthia realized there were no curb ramps, preventing her from making a safe transition between the sidewalk and the street. Given that her rollator walker cannot handle steep curbs, she was forced to stop abruptly, trying to determine how to proceed. Without a gradual slope, stepping off the sidewalk became a high-risk maneuver, as she had to carefully balance herself while lifting her walker over the curb. This process put excessive strain on her legs, arms, and back, making her feel physically exhausted and vulnerable to falls. The absence of ramps made it impossible for her to continue safely, leaving her frustrated and disheartened by the lack of accessibility in the area.

53.5. The Municipality of Vega Alta is responsible for ensuring accessibility in public spaces, including the sidewalk on Jacinto Seijo St., Vega Alta, PR 00692-0000, at coordinates 18.412993661587677, -66.32942823290983, near Escuela Urbana, Héctor Flores Passive Park, and Plaza de los Veteranos, as well as at coordinates 18.412959840080465, -66.32967087794714, which are also located on the same sidewalk. Mrs. Cynthia E. Concepción Bruno faced significant challenges while attempting to navigate this area due to the poor condition of the sidewalk. The cracks, uneven patches, and loose debris posed a considerable risk, making it difficult for her to maintain stability with her walker, forcing her to exert extra

effort and increasing the risk of falls. Furthermore, traffic signs obstructed the narrow path, preventing her from passing safely and forcing her to perform dangerous maneuvers that compromised her balance. The lack of space and clear passage made her feel trapped, frustrated, and in danger, highlighting the urgent need for corrective measures to ensure her independent and safe mobility.

- 53.6. To ensure that Mrs. Cynthia E. Concepción Bruno can navigate Jacinto Seijo Street, Vega Alta, PR 00692-0000 safely and without unnecessary physical strain, the Municipality of Vega Alta must implement essential accessibility improvements. First, the sidewalks must be fully repaired, eliminating cracks, uneven surfaces, and loose debris to provide a stable and secure path for individuals using mobility aids such as rollator walkers. Additionally, the traffic signs obstructing the pedestrian path should be relocated to prevent unnecessary obstacles that force individuals to take dangerous detours. To address the extreme narrowness of the sidewalks, they should be widened to allow adequate space for safe maneuvering, ensuring that Mrs. Cynthia can walk comfortably without struggling to adjust her position or risking collisions with walls, poles, or other objects. Most importantly, curb ramps must be installed at all intersections, including at coordinates 18.412959840080465, -66.32967087794714, to provide a smooth and gradual transition between the sidewalk and the street. These ramps should meet accessibility standards, ensuring a proper slope, non-slip surface, and side protection to prevent falls. Lastly, a consistent maintenance program should be established to prevent sidewalks from deteriorating again, ensuring that Mrs. Cynthia and others with mobility impairments can move through the area with confidence, security, and full independence.
54. Mrs. Cynthia E. Concepción Bruno frequently visits Dr. Gilberto Concepción de Gracia Plaza, a place she finds pleasant and enjoyable, which she has visited regularly. She is also interested in Chispas de Azúcar Cake & Coffee Shop, located at 9 Jacinto Seijo Street, Vega Alta, PR 00692-0000, at coordinates 18.41252165179487, -66.32969343721666, due to its reputation for offering high-quality desserts. However, the sidewalk in this area presents obstacles that limit her ability to move freely, making it difficult for her to access both the plaza and the business she is interested in. This

situation has made her feel discouraged from returning, as the lack of accessibility places her in a situation of exclusion and restricts her right to enjoy public spaces on equal terms. Her last visit to the area was in February 2025, and in all the previous months, including throughout 2024, she has frequently passed through this area. Mrs. Cynthia has personally identified the barriers in this location, which include:

- 54.1. When attempting to navigate 9 Jacinto Seijo Street, Vega Alta, PR 00692-0000, Mrs. Cynthia E. Concepción Bruno encountered sidewalks in poor condition, filled with cracks and uneven surfaces, making it extremely difficult for her to move. Since she uses a rollator walker, the uneven surfaces caused the wheels of her walker to get caught in the cracks, causing sudden jolts that compromised her balance and required extra effort to regain it. Given her muscle coordination difficulties, these unexpected movements were even harder to manage, increasing her risk of falling and leaving her physically fatigued. These conditions made it impossible for her to move safely, forcing her to reduce her speed significantly, turning what should have been a simple route into a physically demanding ordeal.
- 54.2. The narrow sidewalks also posed a great challenge for Mrs. Cynthia, as she had to constantly adjust her position with her rollator walker to avoid obstacles like walls and poles. The lack of adequate space made even basic movements, such as turning or repositioning, uncomfortable and difficult. With her reduced mobility, staying within such a confined space became a physically exhausting task, requiring extra effort just to avoid losing balance. This increased her fatigue and made her feel unsafe, as every step involved a greater risk of tripping or bumping into nearby obstacles.
- 54.3. Although there appeared to be ramps at the corners, Mrs. Cynthia suspected that they were in poor condition. Despite her difficulty handling elevated curbs, the ramps did not offer the necessary safety for a smooth transition between the sidewalk and the street. This forced her to stop abruptly, making her perform risky maneuvers with her rollator walker to try and overcome the curb. Without a proper slope, this process caused her significant physical strain, as she had to balance carefully while lifting her walker to get up or down the curb. The lack of

a functional ramp made the journey more dangerous, leaving her exhausted and frustrated by the area's inaccessibility.

- 54.4. Additionally, at the corner of 9 Jacinto Seijo St., Vega Alta, PR 00692-0000 at coordinates 18.412861046571425, -66.32974366861201, there is a ramp in very poor condition and barely identifiable. This deteriorated ramp not only fails to provide safe access for individuals with mobility impairments, but also makes it extremely difficult for Mrs. Cynthia E. Concepción Bruno to navigate the intersection safely. Given its invisibility and condition, the ramp poses a serious risk, preventing her from transitioning smoothly between the sidewalk and the street, further exacerbating the accessibility issues in this area. Immediate repair and proper identification of the ramp are necessary to ensure safe and reliable access for all pedestrians.
- 54.5. The Municipality of Vega Alta is responsible for ensuring accessibility in public spaces, including the sidewalks located at 9 Jacinto Seijo St., Vega Alta, PR 00692-0000, at coordinates 18.41252165179487, -66.32969343721666, near Dr. Gilberto Concepción de Gracia Plaza and Chispas de Azúcar Cake & Coffee Shop, places that Mrs. Cynthia E. Concepción Bruno frequently visits. The same applies to the coordinates 18.412861046571425, -66.32974366861201, which are also located on the same sidewalk. The current condition of the sidewalks in this area presents a significant obstacle to her mobility, as the uneven surfaces and lack of adequate space make it difficult for her to move safely with her walker, increasing the risk of falls and causing her fatigue and frustration. It is urgent for the Municipality of Vega Alta to take immediate action to repair and improve the pedestrian infrastructure, ensuring safe access to these important community spaces and allowing Mrs. Cynthia and others with mobility impairments to move independently and without risk.
- 54.6. To address these significant barriers, the Municipality of Vega Alta must prioritize immediate repairs to the sidewalks on 9 Jacinto Seijo Street, Vega Alta, PR 00692-0000, ensuring they are smooth, even, and free of cracks and loose debris that impede safe movement, especially for individuals using mobility aids like rollator walkers. The sidewalks should be widened to provide adequate space for

safe maneuvering and prevent the need to constantly adjust position around obstacles like walls and poles. Additionally, the ramps at the corners must be properly repaired and re-identified, ensuring they meet accessibility standards with a smooth slope for safe transitions between the sidewalk and the street. The deteriorated ramp at the corner of 9 C. Jacinto Seijo should be restored to a functional condition, allowing safe and reliable access for all pedestrians, including those with mobility impairments. These improvements are essential to ensure Mrs. Cynthia and others can navigate the area independently, safely, and without risk.

55. Mrs. Cynthia E. Concepción Bruno has frequently walked along the sidewalk located at 36 Luis Muñoz Rivera Street, Vega Alta, PR 00692-0000, at coordinates 18.41248611469197, -66.32835058863998, as this area includes businesses of interest to her, such as Café con Salsa and Farmacia Vega Alta. However, despite the proximity of these establishments, she now feels discouraged from returning due to the barriers she has personally identified on the sidewalk. These conditions have made it difficult for her to move safely with her rollator walker, placing her in a discriminatory situation. The lack of maintenance on the sidewalk has turned her mobility into an exhausting and risky task, further limiting her ability to navigate the area independently. As a result, Mrs. Cynthia has felt discouraged from visiting these businesses, highlighting the urgent need to improve accessibility in this area. Her last visit was in February 2025, and in the previous months, including throughout 2024, she used to pass through this area regularly. Mrs. Cynthia has personally identified the barriers in this location, which include:

- 55.1. During her attempt to navigate the sidewalks on 36 Luis Muñoz Rivera Street, Vega Alta, PR 00692-0000, Mrs. Cynthia E. Concepción Bruno struggled due to the poor condition of the sidewalks, which were filled with cracks and uneven surfaces. The rollator walker she uses couldn't handle these irregularities, causing the wheels to get caught in the cracks, resulting in sudden jolts that compromised her balance. Given her muscle coordination difficulties, these unexpected movements were even harder to manage, increasing her risk of falling and leaving her physically fatigued. The poor condition of the sidewalks made it impossible

for her to move safely, forcing her to slow down significantly, turning what should have been a simple route into a physically demanding ordeal.

55.2. As Mrs. Cynthia tried to navigate, she encountered poles blocking the path on the sidewalk. Due to the narrow sidewalks, she was forced to stop and figure out how to get around the obstacle, which proved to be an unnecessary physical effort. The rollator walker did not allow her to maneuver safely around the pole, requiring her to constantly adjust her position, compromising her balance and increasing the risk of tripping. This made her feel unsafe and frustrated, as every movement required additional physical effort, and she could not continue on her route independently without encountering more obstacles.

55.3. The uneven surfaces and potholes on the sidewalk were another significant barrier for Mrs. Cynthia. Every step she took with her rollator walker was a challenge, as the uneven surfaces caused the wheels to get caught or lose balance, requiring her to exert extra effort to maintain control of her mobility device. These obstacles caused abrupt movements that increased her risk of falling, making the journey even more exhausting. In addition, the lack of a smooth and stable surface contributed to her fatigue and lack of confidence, as she couldn't move forward without risking her safety and well-being.

55.4. The Municipality of Vega Alta is responsible for ensuring accessibility in public spaces, including the sidewalks at 36 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.41248611469197, -66.32835058863998. The current condition of the sidewalks poses significant barriers to individuals with reduced mobility, such as Mrs. Cynthia E. Concepción Bruno. The lack of proper maintenance and accessibility in this area has led to difficulties that have compromised her ability to move independently. Due to these conditions, she feels discouraged from returning, as her safety and freedom of movement are at risk. The municipality must ensure that this area is made accessible, as it is their responsibility to guarantee safe movement for all residents, especially those with mobility impairments.

55.5. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take urgent action to ensure accessibility in the

area. First, it is essential to repair the sidewalks to eliminate cracks and uneven surfaces, providing a smooth and stable surface that allows individuals using mobility devices, such as a rollator walker, to move safely. Additionally, the sidewalks should be widened to create more space and prevent obstruction by poles or other obstacles, allowing for safe movement without the risk of tripping. The potholes should be filled and leveled to ensure there are no irregularities that could compromise balance or stability. Finally, the municipality should install proper ramps at the corners to facilitate safe transitions between the sidewalk and the street, with gentle slopes and no obstacles. These improvements will ensure that Mrs. Cynthia and other residents can move independently and safely, removing the barriers that currently limit their access to these essential community spaces.

56. Mrs. Cynthia E. Concepción Bruno has frequently walked along the sidewalks located at 38 Luis Muñoz Rivera Street, Vega Alta, PR 00692-0000, at coordinates 18.41243236153954, -66.32850897247252, as this area is home to Laboratorio Clínico Teresita Vega Alta (formerly Ebenezer), a medically significant establishment in the community, where many people go for health tests and screenings. This laboratory is an important reference point in the area, making it common for Mrs. Cynthia to pass through this location. Additionally, the sidewalk in this area also allows her to access the Lin-Manuel Miranda Gallery, a site of cultural and educational value that interests her due to its content about the trajectory of the renowned Puerto Rican artist. However, the lack of accessibility on the sidewalks has created difficulties that affect her mobility and compromise her safety, exposing her to an experience of exclusion. As a result, Mrs. Cynthia feels discouraged from returning to this area, as the absence of proper sidewalk conditions prevents her from moving freely. Her last visit was in February 2025, and in all the previous months, including throughout 2024, she regularly passed through this area. Mrs. Cynthia has personally identified the barriers in this location:

- 56.1. One of the significant barriers Mrs. Cynthia E. Concepción Bruno faced while navigating the area was the extremely narrow sidewalk. The lack of space made it difficult for her to maneuver her rollator walker safely. Due to the limited width of the sidewalk, she had to constantly adjust her position to avoid obstacles, such as

walls and poles, which put her at a greater risk of tripping or losing balance. The restricted space forced her to exert extra effort just to maintain her stability, causing physical fatigue and leaving her feeling unsafe. The narrow sidewalks not only made it physically exhausting for her to pass through but also restricted her independence and made her question whether it was safe to continue using the route.

56.2. The Municipality of Vega Alta is responsible for ensuring accessibility in public spaces, including the sidewalks located at 38 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.41243236153954, -66.32850897247252. The poor condition of these sidewalks poses significant barriers to people with mobility impairments, such as Mrs. Cynthia E. Concepción Bruno, and it is crucial for the municipality to take action. Due to the inaccessible conditions of the sidewalk, Mrs. Cynthia has faced difficulties that prevent her from moving safely in the area. This has led her to feel discouraged from returning, as her safety and ability to navigate freely are compromised. The municipality must ensure accessibility and take responsibility for making the area safe for all residents, especially those with mobility challenges.

56.3. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to widen the sidewalk and ensure there is enough space for individuals using mobility aids, such as rollator walkers, to navigate safely. By expanding the sidewalk, the municipality would eliminate the need for residents like Mrs. Cynthia to constantly adjust their position to avoid obstacles, reducing the risk of tripping or losing balance. The sidewalk should be widened to provide ample space for safe movement, allowing individuals to pass comfortably without exerting excessive physical effort. Additionally, the municipality should remove any obstructions and ensure the surface is smooth and level, making the route safer and more accessible for all. These changes would enhance independence and security, enabling Mrs. Cynthia and other residents to move freely through the area without limitations or risks.

57. Mrs. Cynthia E. Concepción Bruno has frequented the sidewalk located at 149 Muñoz Rivera Street, Vega Alta, PR 00692-0000, at coordinates 18.411994086029242,

-66.33137691165564, for many years, including consistently every month throughout 2024. This sidewalk is part of her usual route, as it allows her to access businesses of interest, such as El Batey, Panadería y Repostería Del Carmen & Pastry Shop, and Flacos Pincho's, places where she used to shop and enjoy the quality of their products. However, despite having regularly used this sidewalk for a long time, the discriminatory conditions she has encountered have now made her feel discouraged from continuing to use it. Her last visit to this area was in February 2025, when she once again encountered barriers that compromised her mobility and safety. Mrs. Cynthia has personally identified these barriers, which include:

- 57.1. The sidewalk at 149 Muñoz Rivera Street, Vega Alta, PR 00692-0000, has multiple cracks and is in a state of significant disrepair. For Mrs. Cynthia, who relies on a rollator walker due to her diagnosis of Neuromyelitis Optica, these cracks present a constant risk of tripping and falling. Her condition causes muscle weakness and coordination issues, making it especially difficult and dangerous for her to maintain balance on uneven surfaces. Additionally, the vibrations and impact caused by moving over cracks increase her discomfort and fatigue, making it physically exhausting and challenging for her to navigate this sidewalk.
- 57.2. The reduced width of the sidewalk severely limits Mrs. Cynthia's ability to walk safely using her rollator walker. Due to her mobility limitations, she requires sufficient space to maneuver without the risk of veering into the street or getting stuck between obstacles. A narrow sidewalk forces her to walk in an uncomfortable position and exposes her to nearby vehicular traffic, increasing her vulnerability and the risk of an accident. This situation has forced her to avoid the area, depriving her of access to the businesses she once frequently visited.
- 57.3. This sidewalk is frequently obstructed by illegally parked vehicles, preventing the safe passage of pedestrians, especially individuals with disabilities like Mrs. Cynthia. As a result, she is forced to step onto the roadway to continue her route, exposing herself to traffic and increasing her risk of falls or accidents. This barrier not only compromises her safety but also makes her feel marginalized and excluded, as her right to move freely is restricted by the lack of accessibility and noncompliance with parking regulations.

- 57.4. The Municipality of Vega Alta is responsible for ensuring that public sidewalks are safe and accessible for all residents, including individuals with disabilities such as Mrs. Cynthia E. Concepción Bruno. The sidewalk located at 149 Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.411994086029242, -66.33137691165564, in front of Panadería y Repostería Del Carmen, presents multiple obstacles that affect her mobility, including cracks, insufficient width, and obstructions caused by improperly parked vehicles. These hazardous and inaccessible conditions prevent her from moving safely, restricting her right to mobility and equal access. Due to these barriers and the difficulties she has encountered, Mrs. Cynthia feels discouraged from traversing this area again, as the municipality has failed in its duty to ensure proper conditions for her mobility.
- 57.5. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate and effective corrective measures to ensure that the sidewalk at 149 Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.411994086029242, -66.33137691165564, in front of Panadería y Repostería Del Carmen, is accessible and safe for all pedestrians, including individuals with disabilities. The Municipality must repair the damaged sidewalk by resurfacing it and eliminating cracks and uneven surfaces that pose a risk of tripping and falling, particularly for individuals like Mrs. Cynthia, who relies on a rollator walker due to her mobility limitations. Additionally, it is essential to widen the sidewalk to provide sufficient space for safe navigation, allowing pedestrians with assistive devices to move freely without being forced into unsafe positions or proximity to vehicular traffic. Furthermore, the Municipality must strictly enforce parking regulations to prevent vehicles from illegally obstructing the sidewalk, ensuring that it remains a safe and unobstructed passage for all users. These actions must be implemented without delay to uphold the rights of individuals with disabilities and guarantee that Mrs. Cynthia and others can navigate the area safely and independently.
58. For years, Mrs. Cynthia E. Concepción Bruno has walked along the sidewalks on Candelaria Road, Vega Alta, PR 00692-0000, at coordinates 18.411958022839976, -66.33172797615813, visiting them every month, including frequently throughout 2024.

This area is of great interest to her as it allows access to businesses such as El Company Bar Café, El Poder Indio, and Flacos Pincho's, as well as her favorite establishment, Panadería y Repostería Del Carmen, where she enjoys its excellent bread and mallorcas. However, the constant barriers she has faced while using these sidewalks have made her feel discouraged from continuing to use them. Her last visit was in February 2025, when she once again experienced difficulties in moving safely. Mrs. Cynthia has personally identified the barriers present in this area, which include:

- 58.1. The sidewalks along Candelaria Road, Vega Alta, PR 00692-0000 are extremely narrow, making it difficult for pedestrians, particularly individuals with mobility impairments, to navigate safely. For Mrs. Cynthia E. Concepción Bruno, who relies on a rollator walker due to Neuromyelitis Optica, the lack of adequate sidewalk width creates a significant barrier. She requires enough space to maneuver safely without the risk of veering into the roadway or getting stuck between obstacles. The limited space forces her to walk in an uncomfortable position, increasing her fatigue and discomfort. Additionally, her condition causes muscle weakness and coordination difficulties, making it even more dangerous for her to traverse such a restricted area without adequate room to stabilize herself.
- 58.2. In addition to being narrow, the sidewalks in this area are frequently obstructed by objects and merchandise placed by businesses, further reducing the available walking space. For Mrs. Cynthia, these obstructions create hazardous conditions, as she must navigate around them, which increases the risk of losing her balance and falling. Given her limited mobility and reliance on a rollator walker, maneuvering through obstacles requires additional physical effort, causing strain and exacerbating the fatigue she already experiences due to her condition. When sidewalks are blocked, she is often forced to step onto the street, exposing herself to vehicular traffic and putting her safety at serious risk.
- 58.3. The Municipality of Vega Alta is responsible for maintaining the sidewalks located on Candelaria Road, Vega Alta, PR 00692-0000, at coordinates 18.411958022839976, -66.33172797615813, in front of Cafetería El Company Bar, El Poder Indio, and Flacos Pincho's. These sidewalks, which should allow for the safe passage of all pedestrians, present serious issues such as an extremely

narrow width and obstructions caused by objects and merchandise, making it impossible for Mrs. Cynthia E. Concepción Bruno to move safely. These conditions not only affect her access to the area but have also made her feel excluded and discouraged from returning, as the municipality has failed to take action to ensure accessibility for individuals with limited mobility.

58.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate and effective action to ensure that the sidewalks along Candelaria Road, Vega Alta, PR 00692-0000 are safe and accessible for all pedestrians, including individuals with disabilities. The Municipality must widen the sidewalks to provide sufficient space for safe passage, ensuring that individuals using mobility aids, such as Mrs. Cynthia's rollator walker, can maneuver without difficulty or risk of veering into the roadway. Additionally, the Municipality must strictly enforce regulations prohibiting the obstruction of sidewalks by objects and merchandise placed by businesses, as these barriers significantly hinder accessibility and create dangerous conditions. Ensuring compliance with accessibility standards is essential to prevent further discrimination and exclusion of individuals with disabilities. These corrective measures must be implemented without delay to uphold the rights of Mrs. Cynthia and other individuals with mobility impairments, guaranteeing their safety, independence, and equal access to the area.

59. Mrs. Cynthia E. Concepción Bruno has walked along the sidewalk located at 25 Gabriel Hernández Street, Vega Alta, PR 00692-0000, at coordinates 18.41363868932464, -66.3316661838717, on a monthly basis for a long time, including every month throughout 2024. This sidewalk allows her to access Nelly's Baby Food Center, an establishment where she finds an excellent variety of fresh fruits and vegetables, in addition to receiving friendly and efficient service. However, the barriers she has faced while using this area have made her feel discouraged from continuing to use it. Her last visit was in February 2025, when she once again encountered obstacles that hindered her mobility. Mrs. Cynthia has personally identified the barriers in this area, which include:

- 59.1. The sidewalk along 25 Gabriel Hernández St., Vega Alta, PR 00692-0000 appears to be extremely narrow and is further obstructed by overgrown vegetation, significantly limiting the available walking space. For Mrs. Cynthia E. Concepción Bruno, who relies on a rollator walker due to her Neuromyelitis Optica, this presents a severe accessibility barrier. She requires enough space to maneuver safely without the risk of getting entangled in vegetation, veering off the sidewalk, or being forced onto the street. Her condition causes muscle weakness and coordination difficulties, making it particularly challenging for her to stabilize herself in such a restricted area. Additionally, overgrown plants can hide uneven surfaces, debris, or other hazards, increasing the risk of tripping and falling, which could result in serious injuries. The presence of vegetation encroaching onto the sidewalk further discourages her from using the area, as it exacerbates the already hazardous and inaccessible conditions.
- 59.2. The absence of an identifiable ramp or the unclear presence of one at this location creates a significant barrier for Mrs. Cynthia, as she relies on smooth, sloped transitions to safely access sidewalks. Due to her mobility limitations and reliance on a rollator walker, curbs and sudden elevation changes pose a substantial challenge, requiring her to exert additional physical effort and increasing her risk of falls. Without a properly marked and functional ramp, she faces difficulty entering or exiting the sidewalk, often leaving her with no choice but to seek alternative, often unsafe, routes. The strain of lifting her walker onto a high curb can exacerbate her fatigue and muscle weakness, making travel through the area unnecessarily exhausting and dangerous. The lack of proper ramps not only restricts her freedom of movement but also reinforces the discrimination she faces in accessing public spaces.
- 59.3. Additionally, on the same sidewalk, at coordinates 18.41313694545233, -66.33169413172949, Mrs. Cynthia personally encountered several barriers that seriously hindered her mobility. The sidewalk at this location is extremely narrow and is obstructed by overgrown vegetation, presenting a significant obstacle for her, as she relies on a rollator walker due to her Neuromyelitis Optica. These conditions create an accessibility barrier, as Mrs. Cynthia needs adequate space to

maneuver safely without the risk of getting tangled in the vegetation, veering off the sidewalk, or being forced to step onto the street. Furthermore, the presence of overgrown plants hid uneven surfaces and debris, increasing the risk of tripping and falling, which could have resulted in serious injuries. These difficulties further increased her physical fatigue and muscle strain due to her condition, making her movement even more challenging.

59.4. Moreover, on the same sidewalk, at coordinates 18.41313694545233, -66.33169413172949, Mrs. Cynthia also encountered a significant barrier due to the lack of a clearly identifiable ramp at this location. Due to her limited mobility, muscle weakness, and fatigue, she depends on smooth, sloped transitions to access sidewalks safely. The absence of a functional ramp made the curbs and sudden elevation changes a serious challenge, forcing her to exert additional physical effort, increasing her risk of falls. The need to lift her rollator walker to go over a high curb worsened her fatigue and physical effort, making her movement unnecessarily exhausting and dangerous, which reinforces the discrimination she faces when trying to access public spaces safely and with dignity.

59.5. The sidewalk located at 25 Gabriel Hernández St., Vega Alta, PR 00692-0000, at coordinates 18.41363868932464, -66.3316661838717, near Residencial Francisco Vega Sánchez and Nelly's Baby Food Center, as well as at coordinates 18.41313694545233, -66.33169413172949, falls under the jurisdiction and responsibility of the Municipality of Vega Alta. The municipality is responsible for maintaining the sidewalk in a condition that allows safe passage for all individuals, including those with disabilities such as Mrs. Cynthia E. Concepción Bruno. However, the current state of the sidewalk—including the narrow available space, overgrown vegetation encroaching on the walkway, and the absence of a properly marked ramp—creates significant barriers that prevent its safe use. These conditions compromise her mobility and put her safety at risk. Due to the municipality's failure to ensure accessibility in this area, Mrs. Cynthia has encountered substantial difficulties while trying to navigate it and feels discouraged from returning.

- 59.6. The Municipality of Vega Alta can resolve the accessibility barriers along the sidewalk at 25 Gabriel Hernández St., Vega Alta, PR 00692-0000, by implementing comprehensive modifications to ensure safe and accessible pedestrian access. First, the municipality must clear the overgrown vegetation encroaching on the walkway to provide a sufficiently wide and unobstructed path for individuals using mobility aids such as rollator walkers, while also establishing a maintenance plan to prevent future obstructions. Second, it must construct properly marked and functional ramps at all locations where curbs or sudden elevation changes create mobility challenges. These ramps must comply with ADA standards, ensuring the appropriate width, slope, and surface texture for safe use, particularly at coordinates 18.41313694545233, -66.33169413172949, where Mrs. Cynthia encountered significant barriers. Third, the sidewalk should be widened to allow adequate maneuvering space, preventing individuals with mobility impairments from being forced onto the street, which poses a severe safety risk. Additionally, the municipality must inspect and repair any uneven surfaces, debris, or other hazards that could cause tripping or instability for pedestrians with disabilities. By addressing each of these issues, including the installation of clearly identifiable ramps at all necessary locations, the municipality would fulfill its responsibility to provide an accessible pedestrian route, ensuring that individuals like Mrs. Cynthia E. Concepción Bruno can navigate the area safely and with dignity, without experiencing unnecessary physical strain or discrimination.
60. For many years, Mrs. Cynthia E. Concepción Bruno has walked along the sidewalk located in Bajura, Vega Alta, PR 00692-0000, at coordinates 18.413741698549153, -66.33303243807927, every month, including uninterrupted use throughout 2024. This route is of great importance to her as it allows her to reach Nuestra Señora del Carmen Cemetery, a place of personal and community significance. However, the barriers she faces while using this sidewalk have made her feel discouraged from continuing to use it, as they compromise her autonomy and safety. Her last visit was in February 2025, when she once again encountered obstacles that affected her mobility. Mrs. Cynthia has personally identified the barriers in this area, which include:

- 60.1. The sidewalks in Bajura, Vega Alta, PR 00692-0000 are frequently blocked by vehicles parked illegally, preventing pedestrians, especially individuals with disabilities, from navigating safely. For Mrs. Cynthia E. Concepción Bruno, who relies on a rollator walker due to Neuromyelitis Optica, this obstruction creates a significant barrier to her mobility. Because of her muscle weakness and coordination difficulties, she requires a clear and unobstructed path to avoid unnecessary physical strain and the risk of losing balance. When sidewalks are blocked, she is often forced to step onto the street, exposing herself to oncoming traffic and increasing her risk of serious accidents or falls. This dangerous situation not only threatens her physical safety but also makes her feel excluded and discouraged from visiting the area.
- 60.2. In addition to being obstructed by parked vehicles, the sidewalks in Bajura, Vega Alta, PR appear to be in poor condition and uneven, creating an even greater challenge for Mrs. Cynthia. Given her limited mobility, muscle weakness, and reliance on a rollator walker, she requires a smooth, stable surface to walk safely. Cracks, potholes, and uneven pavement increase the risk of tripping and falling, which could result in severe injuries. Walking over an unstable surface also requires additional physical effort, which exacerbates her fatigue and strain, making it unnecessarily exhausting for her to move through the area. These unsafe conditions further reinforce the discriminatory barriers that prevent her from accessing the spaces she regularly visited.
- 60.3. The Municipality of Vega Alta has an obligation to maintain the sidewalks in Bajura, Vega Alta, PR 00692-0000, at coordinates 18.413741698549153, -66.33303243807927, in front of Extensión Sánchez, in accessible conditions. However, the presence of illegally parked vehicles blocking the walkway, along with deteriorated pavement and hazardous uneven surfaces, has made this area inaccessible for Mrs. Cynthia E. Concepción Bruno. These barriers have prevented her from moving safely, causing her discomfort and physical difficulties that have led her to refrain from using this route again. The municipality's failure to implement corrective measures has resulted in Mrs.

Cynthia avoiding this area due to the insecurity and lack of accessibility she encounters.

60.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate and effective measures to ensure that the sidewalk in Bajura, Vega Alta, PR 00692-0000 is safe and accessible for all pedestrians, particularly individuals with disabilities. The Municipality must strictly enforce parking regulations to prevent vehicles from illegally blocking the sidewalks, ensuring a clear and unobstructed path for individuals who rely on mobility aids, such as Mrs. Cynthia's rollator walker. This action is essential to prevent pedestrians with disabilities from being forced onto the street, which exposes them to serious safety risks. Additionally, the Municipality must repair and level the sidewalks to eliminate cracks, potholes, and uneven pavement that create tripping hazards. Mrs. Cynthia requires a smooth and stable walking surface to move safely and avoid unnecessary physical strain. The current state of the sidewalks increases her fatigue, muscle strain, and risk of falling, making her journey exhausting and dangerous. By addressing these barriers without delay, the Municipality will uphold accessibility laws, promote inclusivity, and ensure that Mrs. Cynthia and other individuals with disabilities can navigate the area safely, independently, and with dignity.

61. Mrs. Cynthia E. Concepción Bruno has regularly walked along the sidewalk on Santo Domingo Street, Vega Alta, PR 00692-0000, at coordinates 18.410637916173574, -66.33197493389312, visiting it every month for a long time, including throughout 2024. This sidewalk allows her to reach El Boringalle, an establishment she enjoys for its varied food offerings, such as alcapurrias, empanadillas, and mofongo. However, due to the poor condition of the sidewalk, she now feels discouraged from continuing to use it, as each attempt to move through this area poses a risk to her safety. Her last visit was in February 2025, when she once again encountered difficulties in navigating the area. Mrs. Cynthia has personally identified the barriers in this location, which include:

61.1. The sidewalks along Santo Domingo Street, Vega Alta, PR 00692-0000 are extremely narrow, nearly nonexistent, making it nearly impossible for pedestrians, especially those with mobility impairments, to navigate safely. For Mrs. Cynthia

E. Concepción Bruno, who relies on a rollator walker due to Neuromyelitis Optica, the lack of adequate sidewalk space severely limits her ability to move independently and safely. Because of her muscle weakness and coordination difficulties, she requires sufficient space to maneuver without the risk of losing balance or veering into dangerous areas. The absence of a properly designed and accessible sidewalk forces her into uncomfortable and unsafe walking conditions, increasing her fatigue and making it physically exhausting for her to travel through the area.

61.2. Although there is a corner at Santo Domingo Street, Vega Alta, PR 00692-0000 it does not provide safe or accessible transitions for individuals with mobility impairments. For Mrs. Cynthia, the lack of proper sidewalk connectivity means she cannot rely on a continuous, stable walking path, making it extremely difficult to maneuver her rollator walker. Any abrupt elevation changes or missing sidewalk sections force her to make unsafe adjustments, placing additional strain on her weakened muscles and compromised coordination. If she encounters an uneven curb or a missing ramp, she may be forced to exert excessive physical effort to lift her walker or search for an alternative, often unsafe, route. This significantly increases her risk of falls and injuries, further discouraging her from attempting to navigate the area.

61.3. The Municipality of Vega Alta is responsible for the sidewalks located on Santo Domingo St., Vega Alta, PR 00692-0000, at coordinates 18.410637916173574, -66.33197493389312, near the business El Boringalle. These sidewalks are in conditions that prevent their safe use by individuals with disabilities. The extreme narrowness of the path, the lack of adequate walking space, and the absence of safe transitions at the corners make it impossible for Mrs. Cynthia E. Concepción Bruno to navigate this area independently. Faced with these difficulties and the municipality's failure to ensure accessibility, Mrs. Cynthia feels discouraged from returning, as the current infrastructure does not allow her to move without encountering obstacles that compromise her safety and dignity. As the entity responsible for maintaining public spaces, the municipality must take immediate

action to resolve these issues and guarantee Mrs. Cynthia's access to the area without further hardship.

61.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk along Santo Domingo Street, Vega Alta, PR 00692-0000 is safe and accessible for all pedestrians, particularly individuals with disabilities. This includes widening the sidewalks to provide adequate space for mobility aid users, removing obstacles that force pedestrians into unsafe areas, and installing properly marked and functional ramps at intersections to allow for smooth and safe transitions. Additionally, the Municipality must repair any uneven surfaces or missing sidewalk sections to ensure a continuous, stable walking path that does not increase fatigue, strain, or the risk of falls for individuals with mobility impairments. Implementing these corrective measures without delay is essential to prevent further discrimination and exclusion and to ensure that Mrs. Cynthia and other individuals with disabilities can navigate the area safely, independently, and with dignity.

62. For many years, Mrs. Cynthia E. Concepción Bruno has walked along the sidewalk located at 80 Unión Street, Vega Alta, PR 00692-0000, at coordinates 18.41130247572425, -66.33009090995921, every month, including continuously throughout 2024. This sidewalk allows her to access Gilberto Concepción de Gracia Plaza, a place she enjoys for its peaceful and pleasant environment. However, the conditions of this sidewalk have made her feel discouraged from continuing to use it, as the barriers present hinder her mobility. Her last visit was in February 2025, when she once again encountered obstacles that prevented her from moving safely. Mrs. Cynthia has personally identified the barriers in this area, which include:

62.1. The sidewalks along 80 Unión St., Vega Alta, PR 00692-0000 are extremely narrow, creating a significant barrier for Mrs. Cynthia E. Concepción Bruno, who relies on a rollator walker due to her Neuromyelitis Optica. Due to her muscle weakness and coordination difficulties, she requires ample space to maneuver safely. The narrow sidewalks make it difficult for her to maintain her balance and stability, increasing the risk of tripping or losing her balance. The lack of space

forces her to walk in an uncomfortable and unsafe manner, exacerbating her fatigue and physical strain, which makes it challenging and exhausting for her to travel through the area.

62.2. In addition to the narrow sidewalks, vehicles are often parked illegally on the sidewalks along 80 Unión St., Vega Alta, PR 00692-0000, obstructing Mrs. Cynthia's path. As she uses a rollator walker, she requires an unobstructed path to move safely. When vehicles block the sidewalk, she is often forced to step into the street, exposing herself to oncoming traffic and increasing her risk of accidents or falls. The need to navigate around these obstacles places unnecessary strain on her weakened muscles and impairs her ability to move independently. This situation discriminates against her and prevents her from accessing the area with the safety and dignity she deserves.

62.3. The sidewalk on 80 Sur St., Vega Alta, PR 00692-0000, at coordinates 18.41057256813005, -66.3302008760718, presents several barriers for Mrs. Cynthia E. Concepción Bruno. The extreme narrowness of the sidewalk in this area forces her to maneuver through tight spaces, making it difficult for her to move with her rollator walker. This narrow path not only increases her physical effort but also exacerbates the stiffness and pain in her muscles, making the walk particularly exhausting. Furthermore, this sidewalk is in poor condition, with cracks and uneven surfaces that force Mrs. Cynthia to carefully navigate to avoid potential falls or injury. These conditions have made it impossible for her to walk comfortably in this area, and as a result, she feels dissuaded from returning.

62.4. In the same sidewalk at coordinates 18.41057256813005, -66.3302008760718, the sidewalk remains narrow and in poor condition. The lack of space to maneuver properly continues to restrict Mrs. Cynthia's ability to walk freely and safely, while the deteriorating pavement further complicates her journey. These ongoing issues in the same area intensify the discomfort and physical strain she experiences, preventing her from enjoying her walks and reducing her overall quality of life.

62.5. The Municipality of Vega Alta is responsible for ensuring that sidewalks are accessible to all pedestrians, especially individuals with disabilities such as Mrs.

Cynthia E. Concepción Bruno. However, the sidewalk located at 80 Unión St., Vega Alta, PR 00692-0000, at coordinates 18.41130247572425, -66.33009090995921, is in inadequate condition for her mobility. The space is extremely narrow and is frequently obstructed by improperly parked vehicles, preventing her from moving safely. The lack of proper access in this section has caused Mrs. Cynthia to feel discouraged from returning to this area, as the municipality has failed to take action to ensure she can navigate it with dignity and safety. Additionally, this same sidewalk at coordinates 18.41057256813005, -66.3302008760718 continues to present similar challenges, further contributing to her difficulty and discomfort when attempting to navigate the area.

- 62.6. The Municipality of Vega Alta can address the accessibility barriers along 80 Unión St. and 80 Sur St., Vega Alta, PR 00692-0000, by implementing several key modifications. First, the municipality must widen the sidewalks to provide sufficient space for individuals using mobility aids, such as rollator walkers, ensuring that pedestrians like Mrs. Cynthia E. Concepción Bruno can maneuver safely without the risk of losing balance or experiencing unnecessary strain. Second, illegal parking on sidewalks must be strictly enforced through the installation of physical deterrents, such as bollards or raised curbs, along with proper signage and regular enforcement to prevent vehicles from obstructing pedestrian pathways. Third, the deteriorating sidewalk surfaces at 80 Sur St., particularly at coordinates 18.41057256813005, -66.3302008760718, must be repaired and leveled to eliminate cracks and uneven surfaces that pose tripping hazards. Finally, the municipality should implement a maintenance plan to keep sidewalks clear, safe, and accessible, ensuring that individuals with disabilities can navigate these areas without unnecessary physical hardship or safety risks. By addressing each of these barriers, the municipality would fulfill its duty to provide an inclusive and accessible pedestrian infrastructure, allowing individuals like Mrs. Cynthia to move through the area safely and with dignity.
63. The sidewalk on 42 Libertad St., Vega Alta, PR 00692-0000, at coordinates 18.410998263006874, -66.33025859281088, is a route that Mrs. Cynthia frequently uses, as there are businesses in the area that interest her. Among them is Colmado Los Amigos,

a store known for offering ice-cold beers, and Plaza del Despalillador, a true gem in the area. The plaza is admired for its stunning architecture, which blends historic charm with a welcoming ambiance, making it a favorite spot for locals and visitors alike. Its inviting atmosphere encourages people to gather, relax, and enjoy the cultural richness of the space. However, due to the discriminatory situation she faces when navigating these sidewalks, Mrs. Cynthia now feels discouraged and disheartened from going. Until February 2025, she had regularly passed through the area every month, but the current conditions have led her to avoid it altogether. The barriers that Mrs. Cynthia personally identified were:

- 63.1. The sidewalks along 42 Libertad St., Vega Alta, PR 00692-0000 are extremely narrow, making it nearly impossible for pedestrians, especially individuals with mobility impairments, to navigate safely. For Mrs. Cynthia E. Concepción Bruno, who relies on a rollator walker due to her Neuromyelitis Optica, the lack of adequate space creates a severe barrier to her mobility. Her muscle weakness and coordination difficulties make it crucial for her to have enough space to maneuver safely. The narrow sidewalks not only increase her risk of tripping and losing balance, but also force her to walk in an uncomfortable and unsafe manner, leading to increased fatigue and physical strain. These conditions make it challenging and exhausting for her to travel through the area, further limiting her independence.
- 63.2. In addition to being extremely narrow, the sidewalks in this area seem almost nonexistent, with sections that are poorly marked or completely absent. This creates a significant hazard for Mrs. Cynthia, who needs a stable and continuous walking path to move safely. The absence of clearly defined sidewalks or any walking space forces her into unsafe areas, such as stepping onto the road, which exposes her to vehicular traffic and significantly increases her risk of accidents and falls. As someone with limited mobility, she faces greater physical challenges and strain in navigating such a hazardous environment. The lack of proper sidewalks also makes her feel excluded and discriminated against, as she cannot easily access the area with the safety and dignity she deserves.

63.3. The Municipality of Vega Alta is responsible for the sidewalks located at 42 Libertad St., Vega Alta, PR 00692-0000, at coordinates 18.410998263006874, -66.33025859281088. In this section, the sidewalks are extremely narrow and, in some areas, nearly nonexistent, creating an inaccessible environment for individuals with reduced mobility, such as Mrs. Cynthia E. Concepción Bruno. The lack of a safe and continuous pathway prevents her from moving without risking her stability and safety. As a result of these barriers and the municipality's failure to take action, Mrs. Cynthia has avoided traveling through this area, as the current conditions do not allow her to move independently.

63.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk along 42 Libertad St., Vega Alta, PR 00692-0000 is safe and accessible for all pedestrians, particularly individuals with disabilities. The Municipality must widen the sidewalks to provide sufficient space for safe passage, allowing individuals using mobility aids, such as Mrs. Cynthia's rollator walker, to maneuver without difficulty. Additionally, the Municipality must ensure the sidewalks are continuous and clearly marked, removing any sections that are poorly defined or completely absent, to prevent pedestrians from stepping into the road and being exposed to vehicular traffic. By implementing these corrective measures without delay, the Municipality will improve accessibility, reduce risks of accidents and falls, and ensure that Mrs. Cynthia and other individuals with disabilities can navigate the area safely and independently.

64. For many years, Mrs. Cynthia E. Concepción Bruno has frequently walked along the sidewalk located at 3 E. Giboyeaux St., Vega Alta, PR 00692-0000, at coordinates 18.411643490101895, -66.3271473294251, visiting it every month, including throughout 2024. This route allows her to access Caribbean Security Doors & Windows, a business of interest to her due to its variety of high-quality, modern security products. However, due to the barriers she has encountered along the way, she now feels discouraged from continuing to use this sidewalk, as each attempt poses a risk to her mobility. Her last visit was in February 2025, when she once again experienced difficulties navigating this area. Mrs. Cynthia has personally identified the barriers in this location, which include:

- 64.1. The sidewalks along 3 E. Giboyeaux St., Vega Alta, PR 00692-0000 are extremely narrow, which creates a significant barrier for Mrs. Cynthia E. Concepción Bruno, who relies on a rollator walker due to her Neuromyelitis Optica. Given her muscle weakness and coordination difficulties, she needs sufficient space to maneuver safely. The narrow sidewalks make it difficult for her to maintain her balance and stability, increasing the risk of tripping or losing her balance. This forces her to walk in an uncomfortable and unsafe manner, leading to increased fatigue and physical strain, making it challenging and exhausting for her to move through the area independently.
- 64.2. In addition to being narrow, the sidewalks are frequently obstructed by overgrown vegetation, which further complicates Mrs. Cynthia's ability to navigate the area safely. The presence of plants and weeds forces her to navigate around them, increasing the risk of tripping and placing unnecessary strain on her already weakened muscles. This vegetation also reduces the available walking space, forcing her into potentially dangerous areas, such as stepping onto the street, exposing her to vehicular traffic. The difficulty in maneuvering around these obstructions exacerbates her fatigue and increases the physical strain, making the journey more exhausting and unsafe.
- 64.3. Furthermore, the sidewalk has uneven pavement with cracks and damaged surfaces, which is another significant barrier for Mrs. Cynthia. The uneven surfaces increase the risk of tripping and falling, which could result in severe injuries. For someone with limited mobility and coordination difficulties, navigating cracked and uneven surfaces places extra strain on her already weakened muscles and exacerbates her fatigue. Walking on these surfaces makes it physically exhausting and dangerous for Mrs. Cynthia, as she has to put extra effort into stabilizing herself while dealing with these hazards.
- 64.4. The Municipality of Vega Alta is responsible for maintaining the sidewalks on 3 E. Giboyeaux St., Vega Alta, PR 00692-0000, at coordinates 18.411643490101895, -66.3271473294251. However, this area presents obstacles that limit the mobility of individuals with disabilities, such as Mrs. Cynthia E. Concepción Bruno. The sidewalk is narrow, overgrown with vegetation, and the

pavement is deteriorated with cracks and uneven surfaces, making it unsafe for use. Due to these conditions and the municipality's failure to take corrective action, Mrs. Cynthia has avoided traveling through this area, as its infrastructure does not allow her to move without facing difficulties and safety risks.

- 64.5. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk along 3 E. Giboyeaux St., Vega Alta, PR 00692-0000 is safe and accessible for all pedestrians, particularly individuals with disabilities. The Municipality must widen the sidewalks to provide sufficient space for safe passage, allowing individuals using mobility aids, such as Mrs. Cynthia's rollator walker, to navigate without difficulty or risk of tripping and losing balance. Additionally, the Municipality must remove overgrown vegetation that obstructs the path, increasing the risk of tripping and forcing pedestrians into unsafe areas. The Municipality must also repair the damaged pavement by fixing cracks and uneven surfaces, ensuring a continuous, stable walking path that does not increase the physical strain or risk of falls for individuals with limited mobility. These corrective measures must be implemented without delay to guarantee safe and independent movement for Mrs. Cynthia and other pedestrians with disabilities.
65. Mrs. Cynthia E. Concepción Bruno has consistently walked along the sidewalk located at 1 Luis Muñoz Rivera Street, Vega Alta, PR 00692-0000, at coordinates 18.4128959693594, -66.32688867852079, every month for a long time, including throughout 2024. This sidewalk is essential to her mobility, as it allows her to reach places of interest such as Junior's Place & Seas Food, where she enjoys fresh seafood, and Sweet by Negri, known for its excellent coffee and brownies. Additionally, she enjoys walking through this area due to the presence of Iglesia Discípulos De Cristo Vega Alta, whose peaceful atmosphere she finds pleasant. However, the barriers she has encountered have made her feel discouraged from continuing to use this area. Her last visit was in February 2025, when she once again encountered obstacles that compromised her mobility. Mrs. Cynthia has personally identified the barriers in this location, which include:

- 65.1. The sidewalks along 1 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000 were extremely narrow, which created a significant challenge for Mrs. Cynthia E. Concepción Bruno, who relied on a rollator walker due to Neuromyelitis Optica. Because of her muscle weakness and coordination difficulties, she needed more space to move safely. The narrow sidewalks forced her into uncomfortable walking positions, causing her to lose her balance and struggle to maintain stability. This resulted in her feeling physically exhausted and strained as she tried to navigate the area, making it difficult and painful for her to get through the space.
- 65.2. The ramp for people with disabilities was in poor condition, with uneven surfaces that made it impossible for Mrs. Cynthia to use. Due to her muscle weakness, she struggled to navigate the ramp, exerting extra physical effort to move up and down the ramp. This caused her increased fatigue, making it difficult for her to maintain her independence and compounded the strain on her weakened muscles. The ramp was not a safe option for her, and it created an unnecessary obstacle in her daily life.
- 65.3. The sidewalks were also obstructed by overgrown vegetation, which impeded Mrs. Cynthia's ability to move freely. She had to navigate around the plants, which caused her to lose her balance and exert more physical effort to move through the area. The narrow space, compounded by the vegetation, caused her to step onto the street at times, which was physically exhausting and dangerous for her. The vegetation added an extra layer of difficulty to her daily travels, leaving her feeling frustrated and discriminated against due to her inability to access the area safely and independently.
- 65.4. The Municipality of Vega Alta is responsible for ensuring that the sidewalks located at 1 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.4128959693594, -66.32688867852079, in front of Iglesia Discípulos De Cristo Vega Alta 2, are safe and accessible for all pedestrians, especially individuals with disabilities such as Mrs. Cynthia E. Concepción Bruno. However, these sidewalks present significant barriers, including narrow spaces, deteriorated ramps, and overgrown vegetation obstructing the path. The municipality's lack of

intervention has made this area inaccessible for her, leading her to avoid traveling through this zone, as she cannot move safely or independently.

- 65.5. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk along 1 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000 is safe and accessible for all pedestrians, especially individuals with disabilities. The Municipality must widen the sidewalks to provide sufficient space for safe passage, ensuring that individuals using mobility aids, such as Mrs. Cynthia's rollator walker, can navigate without difficulty. Additionally, the Municipality must repair the damaged ramp by ensuring it has a smooth, even surface that can be used safely by individuals with mobility impairments. The Municipality should also remove overgrown vegetation that obstructs the sidewalk and forces pedestrians into the street, reducing the risk of falls and accidents. These corrective measures must be implemented without delay to guarantee that Mrs. Cynthia and other individuals with disabilities can access the area safely, independently, and with dignity.
66. For years, Mrs. Cynthia E. Concepción Bruno has walked along the sidewalk located at 12 Luis Muñoz Rivera Street, Vega Alta, PR 00692-0000, at coordinates 18.412544202563645, -66.32744738856749, every month, including consistently throughout 2024. This route allows her to reach businesses of interest, such as Sweet by Negri, where she enjoys coffee and desserts, as well as Caribbean Security Doors & Windows, which offers security doors and windows with attractive designs. However, the conditions of the sidewalk have made her feel discouraged from continuing to use it, as each attempt to move through this area presents a challenge to her safety. Her last visit was in February 2025, when she once again faced difficulties navigating the sidewalk. Mrs. Cynthia has personally identified the barriers in this area, which include:
  - 66.1. The sidewalk along 12 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, near BL Uniforms, Blessed Family Nutrition, and Hit Factory Batting Cage, was extremely narrow, which created significant difficulties for Mrs. Cynthia E. Concepción Bruno, who relied on a rollator walker due to her Neuromyelitis Optica. The narrowness of the sidewalk forced her to walk in awkward and unsafe positions, struggling to maintain her balance. Due to her muscle weakness and

coordination difficulties, she lost her balance several times, feeling physically exhausted after each attempt to pass through the area. The lack of space exhausted her further, leaving her with increased fatigue and muscle strain, making it increasingly painful and challenging to travel through the area, and ultimately affecting her ability to navigate the space independently.

66.2. It is the responsibility of the Municipality of Vega Alta to maintain the sidewalks located at 12 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.412544202563645, -66.32744738856749, near BL Uniforms, Blessed Family Nutrition, and Hit Factory Batting Cage, in safe and accessible conditions. However, these sidewalks are too narrow, preventing Mrs. Cynthia E. Concepción Bruno from passing safely and affecting her right to mobility. Due to the lack of proper accommodations and the obstacles she faces in this area, Mrs. Cynthia feels discouraged from returning, as the municipality has failed to ensure conditions that allow her to navigate safely and with dignity.

66.3. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk along 12 Luis Muñoz Rivera St., Vega Alta, PR 00692-0000, near BL Uniforms, Blessed Family Nutrition, and Hit Factory Batting Cage, is safe and accessible for all pedestrians, particularly individuals with disabilities. The Municipality must widen the sidewalks to provide sufficient space for safe passage, allowing individuals using mobility aids, such as Mrs. Cynthia's rollator walker, to navigate freely without the risk of tripping or losing balance. These corrective actions must be implemented without delay to reduce the physical strain, fatigue, and discomfort caused by the narrow conditions and ensure that Mrs. Cynthia and others with disabilities can move through the area safely, independently, and with dignity.

67. Mrs. Cynthia E. Concepción Bruno has walked along the sidewalk located at PR-2, Vega Alta, PR 00692-0000, at coordinates 18.41561862353752, -66.32958392453718, every month for a long time, including frequently throughout 2024. This sidewalk is essential to her mobility, as it allows her to access places such as the United States Postal Service office, where she handles important errands, and Toledo & Co. LLC, a business known

for offering high-quality security products. However, the barriers she has encountered in this area have made her feel discouraged from continuing to use it, as they compromise her autonomy and well-being. Her last visit was in February 2025, when she once again experienced difficulties in navigating the area. Mrs. Cynthia has personally identified the barriers in this location, which include:

- 67.1. The sidewalk along PR-2, Vega Alta, PR 00692-0000, in front of Fresenius Kidney Care Vega Alta, was extremely narrow, which caused significant difficulty for Mrs. Cynthia E. Concepción Bruno, who relied on a rollator walker due to her Neuromyelitis Optica. The narrowness of the sidewalk forced her to move in an uncomfortable and unsafe manner, struggling to maintain her balance. As a result of her muscle weakness and coordination difficulties, she lost her balance several times, which caused her to feel exhausted and physically strained each time she attempted to pass through the area. This narrow space made it challenging and painful for her to navigate, further limiting her independence and leaving her feeling frustrated and fatigued.
- 67.2. In addition to the narrow sidewalk, a considerable amount of overgrown vegetation obstructed the path, further complicating Mrs. Cynthia's ability to navigate the area. She had to maneuver around the plants, which forced her to lose her balance and exert more physical effort to continue walking. This vegetation reduced the available walking space, which at times led her to step into the road, causing her fatigue to increase. The overgrown plants also made her journey physically exhausting and unsafe, further discouraging her from using the sidewalk in the future.
- 67.3. The Municipality of Vega Alta is responsible for the condition of the sidewalks on PR-2, Vega Alta, PR 00692-0000, at coordinates 18.41561862353752, -66.32958392453718, in front of Fresenius Kidney Care Vega Alta. However, these sidewalks are impassable for Mrs. Cynthia E. Concepción Bruno due to their narrowness and overgrown vegetation obstructing the pathway. These barriers have led her to avoid this area, as the municipality has failed to take action to ensure that individuals with limited mobility can navigate safely and without risk.

- 67.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk along PR-2, Vega Alta, PR 00692-0000, in front of Fresenius Kidney Care Vega Alta, is safe and accessible for all pedestrians, particularly individuals with disabilities. The Municipality must widen the sidewalk to provide sufficient space for safe passage, allowing individuals using mobility aids, such as Mrs. Cynthia's rollator walker, to navigate without difficulty. Additionally, the Municipality must remove the overgrown vegetation that obstructs the path and reduces the available walking space, which forces pedestrians to step into the road. The Municipality must also repair the damaged sidewalk to ensure a smooth and stable walking surface for all pedestrians. These corrective actions must be implemented without delay to ensure that Mrs. Cynthia and other individuals with disabilities can move through the area safely, independently, and with dignity.
68. For years, Mrs. Cynthia E. Concepción Bruno has walked monthly along the sidewalk located on PR-2 Km 30.7, Lot #3, Espinosa Industrial Park, Vega Alta, PR 00692-0000, at coordinates 18.4148563905483, -66.33085859631123, including every month throughout 2024. This sidewalk is of great importance to her, as it allows her to access the United States Postal Service office, a place she visits to handle essential errands. However, due to the barriers she has encountered along the way, she now feels discouraged from continuing to use it, as each attempt to move through this area poses a risk to her safety. Her last visit was in February 2025, when she once again experienced difficulties navigating the sidewalk. Mrs. Cynthia has personally identified the barriers in this area, which include:
- 68.1. The sidewalk was extremely narrow and had very tight dimensions, which created significant challenges for Mrs. Cynthia E. Concepción Bruno, who relied on a rollator walker due to her Neuromyelitis Optica. The narrowness of the sidewalk forced her to walk in awkward and unsafe positions, struggling to maintain her balance. She lost her balance several times, which caused her physical exhaustion and increased strain as she tried to navigate through the limited space. This made it extremely difficult and painful for her to pass through the area, further reducing her independence and leaving her feeling frustrated and fatigued.

- 68.2. In addition to the narrow sidewalk, overgrown vegetation partially obstructed the path, creating further complications for Mrs. Cynthia as she tried to pass through the area. She had to maneuver around the plants, which caused her to lose her balance and exert additional physical effort to keep moving. The presence of this vegetation reduced the available walking space, forcing her into potentially unsafe areas, such as stepping onto the road. This added to her exhaustion and increased the strain on her weakened muscles, making the journey even more challenging and unsafe for her. The obstruction created by the vegetation made her feel discriminated against and excluded from accessing the area with the safety and dignity she deserved.
- 68.3. It is the duty of the Municipality of Vega Alta to ensure that the sidewalks located at PR-2 Km 30.7, Lot #3, Espinosa Industrial Park, Vega Alta, PR 00692-0000, at coordinates 18.4148563905483, -66.33085859631123, in front of Toledo & Co. LLC, are accessible to all pedestrians, including those with disabilities. However, Mrs. Cynthia E. Concepción Bruno has been unable to navigate this area due to the extreme narrowness of the sidewalk and overgrown vegetation encroaching on the pathway. The municipality's inaction regarding these barriers has restricted her mobility, leading her to avoid this area due to the lack of safe conditions for her movement.
- 68.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk along PR-2 Km 30.7, Lot #3, Espinosa Industrial Park, Vega Alta, PR 00692-0000, in front of Toledo & Co. LLC, is safe and accessible for all pedestrians, particularly individuals with disabilities. The Municipality must widen the sidewalk to provide enough space for pedestrians, especially those using mobility aids like Mrs. Cynthia's rollator walker, to move safely. Additionally, the Municipality must remove the overgrown vegetation that is obstructing the path, which forces pedestrians into unsafe areas, such as stepping onto the road. The Municipality must also ensure the sidewalk is clear, well-maintained, and free of hazards that could further restrict access. These corrective actions must be implemented immediately to guarantee that Mrs.

Cynthia and other individuals with disabilities can navigate the area safely, independently, and with dignity.

69. Mrs. Cynthia E. Concepción Bruno has frequently walked along the sidewalk located at 100 PR-2, Vega Alta, PR 00692-0000, at coordinates 18.414480275037732, -66.32958064614537, in front of the United States Postal Service, every month for a long time, including throughout 2024. This sidewalk provides access to Toledo & Co. LLC, a business of interest to her due to the quality of its security products and the variety of locks and hardware it offers. However, the poor conditions of the sidewalk have made her feel discouraged from continuing to use it, as the obstacles along the way have significantly hindered her mobility. Her last visit to the area was in February 2025, when she once again encountered difficulties in moving through. Mrs. Cynthia has personally identified the barriers in this location, which include:

69.1. The sidewalk along 100 PR-2, Vega Alta, PR 00692-0000, in front of the United States Postal Service, was obstructed by posts, which created a significant barrier for Mrs. Cynthia E. Concepción Bruno, who relied on a rollator walker due to her Neuromyelitis Optica. The posts forced her to navigate around them, which caused her to lose her balance several times. This increased her fatigue and made it more difficult for her to move safely through the area. The obstacles made it painful and exhausting for her to continue walking, further restricting her independence and leaving her feeling frustrated and physically strained.

69.2. In addition to the obstructions, the sidewalks were extremely narrow and had potholes and uneven surfaces, making it challenging for Mrs. Cynthia to move through the area. Due to her muscle weakness and coordination difficulties, she had a hard time stabilizing herself on the uneven surfaces, which caused her to trip and struggle multiple times. Each time she encountered a pothole or uneven surface, it required her to exert more physical effort, leaving her feeling physically exhausted and increasing the strain on her muscles. This made walking through the area not only difficult but also painful, hindering her ability to access the space independently.

69.3. At the corner of 100 PR-2, Vega Alta, PR 00692-0000, at coordinates 18.414361259463103, -66.32887568063691, the sidewalk lacks ramps, creating a

significant barrier for Mrs. Cynthia E. Concepción Bruno. As she relies on a rollator walker due to her Neuromyelitis Optica, she was unable to transition smoothly from the sidewalk to the street. The absence of ramps made it difficult and exhausting for her to navigate the intersection, causing her to experience increased physical strain each time she tried to cross. This lack of accessibility not only restricted her independence but also made it painfully challenging for her to safely navigate the area.

69.4. Similarly, at the other corner of the same sidewalk, located at 100 PR-2, Vega Alta, PR 00692-0000, at coordinates 18.414535167687944, -66.32975347096287, there is also a lack of ramps, which created the same challenges for Mrs. Cynthia. This additional obstacle forced her to exert more physical effort and search for alternative, often unsafe, routes to navigate the area. The absence of proper ramp access at both intersections exacerbated her difficulties, making it even harder for her to reach her destination safely and independently. The lack of these essential accommodations has significantly hindered her mobility and quality of life.

69.5. The Municipality of Vega Alta is responsible for maintaining the sidewalks at 100 PR-2, Vega Alta, PR 00692-0000, at coordinates 18.414480275037732, -66.32958064614537, in front of the United States Postal Service office, as well as at intersections with coordinates 18.414361259463103, -66.32887568063691, and 18.414535167687944, -66.32975347096287, in accessible conditions. However, in this area, the sidewalks present multiple barriers, including utility poles obstructing the path, uneven surfaces with potholes, and the absence of ramps at crossings, preventing Mrs. Cynthia E. Concepción Bruno from moving safely. The municipality's failure to address these issues has led Mrs. Cynthia to avoid traveling through this area, as the current conditions do not allow her to navigate independently and without risk.

69.6. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk along 100 PR-2, Vega Alta, PR 00692-0000, in front of the United States Postal Service, is safe and accessible for all pedestrians, particularly individuals with disabilities. The Municipality must remove the posts that obstruct the path,

ensuring the sidewalk is clear and navigable for pedestrians using mobility aids. Additionally, the Municipality must widen the sidewalk to provide sufficient space for safe movement and repair the potholes and uneven surfaces, ensuring a smooth, stable walking path that will reduce physical strain and exhaustion for individuals like Mrs. Cynthia. Furthermore, the Municipality must install ramps at both intersections, located at coordinates 18.414361259463103, -66.32887568063691 and 18.414535167687944, -66.32975347096287, to allow safe and accessible transitions from the sidewalk to the street. These corrective actions must be implemented without delay to guarantee that Mrs. Cynthia and other individuals with disabilities can move through the area safely, independently, and with dignity.

70. Mrs. Cynthia E. Concepción Bruno has regularly walked along the sidewalk located at 1 Gabriel Hernández St., Vega Alta, PR 00692-0000, at coordinates 18.414339180400177, -66.32862860978703, every month for a long time, including throughout 2024. This sidewalk is crucial to her mobility, as it allows her to access Toledo & Co. LLC, a business she finds valuable for its high-quality security products and diverse selection of locks and hardware. However, the poor conditions of the sidewalk have made her feel discouraged from continuing to use it, as the obstacles along the way hinder her ability to move safely and independently. Her last visit was in February 2025, when she once again encountered significant difficulties navigating the area. Mrs. Cynthia has personally identified the barriers in this location, which include:

- 70.1. The sidewalk along 1 Gabriel Hernández St., Vega Alta, PR 00692-0000, near the Policía Municipal de Vega Alta, had cracked surfaces, which posed a significant challenge for Mrs. Cynthia E. Concepción Bruno, who relied on a rollator walker due to her Neuromyelitis Optica. The cracks in the sidewalk caused her to lose her balance several times while trying to navigate the area. She struggled to maintain stability on the uneven surfaces, which increased her physical strain and exhaustion. The cracks made it difficult and painful for her to walk, further restricting her independence and making the task of moving through the area a painful and exhausting ordeal.

- 70.2. In addition to the cracked sidewalks, there was also overgrown vegetation that obstructed the path, creating further complications for Mrs. Cynthia. She had to maneuver around the plants, which caused her to lose her balance and exert more physical effort to continue walking. The overgrown vegetation reduced the available walking space, forcing her into areas where she felt less secure, making her journey even more difficult and unsafe. The obstruction of the path by plants added to her fatigue and physical strain, making the task of navigating the sidewalk even more challenging and exhausting.
- 70.3. The sidewalk also had potholes that further hindered Mrs. Cynthia's ability to navigate safely. The potholes caused her to trip and struggle to maintain her balance, requiring her to exert more physical effort every time she encountered them. The presence of these potholes exacerbated her muscle weakness and coordination difficulties, making it physically painful for her to continue walking. Each time she came across a pothole, it felt like an added burden on her already tired muscles, making it more difficult for her to move through the area with the independence and dignity she deserved.
- 70.4. The sidewalk along 1 Gabriel Hernández St., Vega Alta, PR 00692-0000, at coordinates 18.414602081861144, -66.32877832737593, which is part of the same sidewalk previously described, was frequently obstructed by illegally parked cars, creating a significant barrier for Mrs. Cynthia E. Concepción Bruno. Due to her reliance on a rollator walker because of her Neuromyelitis Optica, the cars blocked her path, forcing her to step into the street to continue her journey. This caused her to lose her balance on several occasions, increasing her fatigue and making it physically exhausting for her to continue walking. The obstacles made it challenging for her to navigate the area, further reducing her independence and leaving her feeling frustrated and physically strained as she dealt with these barriers in her daily movements.
- 70.5. The sidewalk along 1 Gabriel Hernández St., Vega Alta, PR 00692-0000, at coordinates 18.414419343844035, -66.32887403191266, is also part of the same sidewalk previously mentioned. This section of the sidewalk was extremely narrow, leaving little space for Mrs. Cynthia E. Concepción Bruno to move safely.

The sidewalk was obstructed by posts, forcing her to maneuver around them, which caused her to lose her balance several times. Additionally, overgrown vegetation further reduced the walking space, making her journey even more difficult. She had to exert additional physical effort to navigate the area, which resulted in muscle strain and increased fatigue. The lack of space and the presence of these obstacles made her movement through the area painful and exhausting, further restricting her independence and creating a hostile environment for her to navigate safely.

70.6. It is the responsibility of the Municipality of Vega Alta to ensure that the sidewalks located at 1 Gabriel Hernández St., Vega Alta, PR 00692-0000, at coordinates 18.414339180400177, -66.32862860978703, near the Vega Alta Municipal Police, as well as at coordinates 18.414602081861144, -66.32877832737593, and 18.414419343844035, -66.32887403191266, are passable and accessible for all pedestrians, including individuals with disabilities. However, the conditions in this area significantly hinder Mrs. Cynthia E. Concepción Bruno's mobility, as the sidewalks are cracked, overgrown with vegetation, riddled with potholes, obstructed by illegally parked vehicles, and blocked by utility poles. These conditions have caused Mrs. Cynthia to experience loss of balance, fatigue, and pain, leaving her physically exhausted and frustrated. Due to the municipality's failure to take action, she feels discouraged from returning to this area, as the persistent barriers continue to limit her safe and dignified access.

70.7. The Municipality of Vega Alta can resolve the accessibility barriers along 1 Gabriel Hernández St., Vega Alta, PR 00692-0000, by implementing comprehensive improvements to ensure a safe and accessible pedestrian path. First, the municipality must repair and level the cracked sidewalk surfaces and potholes, eliminating tripping hazards that compromise the stability and safety of individuals using mobility aids, such as Mrs. Cynthia E. Concepción Bruno. Second, overgrown vegetation obstructing the sidewalk must be cleared and regularly maintained to ensure an unobstructed walkway. Third, illegal parking on sidewalks, particularly at coordinates 18.414602081861144,

-66.32877832737593, must be strictly enforced through the installation of physical deterrents such as bollards or raised curbs, in addition to clear signage and consistent enforcement efforts to prevent vehicles from blocking pedestrian pathways. Fourth, the municipality must address the narrow sections of the sidewalk, particularly at coordinates 18.414419343844035, -66.32887403191266, by widening the walkway where possible and relocating posts that obstruct the path to ensure an adequate clearance for individuals with mobility impairments. These measures will eliminate unnecessary physical strain, reduce the risk of falls, and allow Mrs. Cynthia to navigate the area safely and independently. By implementing these improvements, the municipality will fulfill its responsibility to provide an inclusive and accessible pedestrian infrastructure, ensuring that individuals with disabilities can move through the area with safety, dignity, and independence.

71. The sidewalk on PR-2, Vega Alta, PR 00692-0000, located in front of the Estación de Bomberos Vega Alta, at coordinates 18.41477510118259, -66.32887457019027, connects to key locations such as the United States Postal Service (USPS) office and the Oficina Municipal para el Manejo de Emergencias (OMME) Vega Alta. These establishments are of particular interest to Mrs. Cynthia E. Concepción Bruno due to the essential services they provide to the community. The USPS office plays a crucial role in handling correspondence, official documents, and administrative matters, which can be especially challenging for individuals with mobility limitations. Similarly, the OMME Vega Alta is an important municipal office dedicated to emergency management and community assistance programs, which could be particularly relevant to her given her condition. However, the lack of accessibility along this sidewalk has turned what should be a straightforward route into a frustrating and exhausting challenge, exposing her to barriers that compromise her safety. As a result, she has chosen to avoid this area, despite having frequently passed through it until February 2025. Mrs. Cynthia has personally identified the following obstacles in this location:

- 71.1. One of the barriers that Mrs. Cynthia identified on this sidewalk is its excessive narrowness, which prevented her from moving comfortably and safely using her rollator walker. On multiple occasions, while attempting to navigate the area, she

was forced to adjust her posture uncomfortably and maneuver with great difficulty to avoid getting stuck between the edges of the sidewalk and other obstacles. This situation caused her severe physical exhaustion, worsening the fatigue and pain she experiences due to her Neuromyelitis Optica. As a result, she suffered from increased muscle stiffness and spasms, affecting her mobility for the rest of the day and forcing her to interrupt her planned activities.

71.2. The Municipality of Vega Alta is responsible for ensuring that the sidewalks located on PR-2, Vega Alta, PR 00692-0000, at coordinates 18.41477510118259, -66.32887457019027, in front of the Estación de Bomberos Vega Alta, are accessible to all pedestrians. However, these sidewalks are currently in a condition that makes them inaccessible to Mrs. Cynthia, creating significant obstacles that prevent her from navigating the area safely. The difficulties and distress she experienced while attempting to use these sidewalks have left her feeling discouraged from returning. The municipality bears full responsibility for this situation, as it has neglected its duty to maintain an inclusive and accessible environment for individuals with disabilities.

71.3. To ensure that Mrs. Cynthia E. Concepción Bruno and other individuals with disabilities can safely navigate the sidewalk on PR-2, Vega Alta, PR 00692-0000 the Municipality of Vega Alta must take immediate corrective action. The sidewalk must be widened to meet accessibility standards, providing sufficient space for individuals using mobility aids such as rollator walkers. Additionally, any obstacles restricting pedestrian movement should be removed or relocated to create a clear and continuous pathway. The Municipality should also implement proper sidewalk markings and install tactile paving where necessary to enhance accessibility and safety. Establishing a routine inspection and maintenance plan will help ensure that the sidewalk remains accessible over time. By implementing these measures, the Municipality can fulfill its obligation to provide a safe and accessible pedestrian route, reducing the physical exhaustion, muscle stiffness, and spasms that Mrs. Cynthia has experienced due to the current hazardous conditions.

72. The sidewalk in Vega Alta, PR 00692-0000, at coordinates 18.41715778759936, -66.329374472464, located in front of CTD Warehouse, serves as a connection to various establishments that are of particular interest to Mrs. Cynthia E. Concepción Bruno due to the products and services they offer. One such business is Toledo & Co. LLC, which specializes in exporting security products, including locks, padlocks, and residential hardware. Ensuring a secure and well-equipped living space is especially significant for individuals facing mobility challenges, making this type of business relevant to her needs. Additionally, the nearby United States Postal Service (USPS) facility is crucial for handling essential administrative tasks, managing mail, and dealing with official documentation, all of which contribute to maintaining personal affairs in order. Unfortunately, the accessibility barriers along this sidewalk have turned what should be a simple route into a strenuous and frustrating experience, forcing her to exert unnecessary effort to navigate the area safely. As a result, she now avoids this path, despite having regularly passed through it every month until February 2025. The barriers that Mrs. Cynthia personally identified were:

- 72.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk in Vega Alta, PR 00692-0000, was its cracked and uneven surface, which made it extremely difficult for her to navigate using her rollator walker. As she attempted to move through the area, the uneven pavement caused sudden jolts and instability, forcing her to repeatedly adjust her grip on the walker and shift her weight to maintain balance. This continuous strain intensified the muscle weakness and spasms caused by her Neuromyelitis Optica, making each step more painful and exhausting. By the time she reached the end of the sidewalk, she felt overwhelming fatigue and heightened discomfort, preventing her from continuing her activities as planned.
- 72.2. Additionally, the sidewalk was obstructed by poles, overgrown vegetation, and trees, further complicating Mrs. Cynthia's ability to pass through. On multiple occasions, she had to stop, reposition herself, and maneuver around these obstacles, which demanded excessive physical effort and prolonged her time on the sidewalk. The narrow gaps left between these obstructions and the edge of the sidewalk forced her into awkward and uncomfortable positions, aggravating her

chronic pain and muscle stiffness. After enduring these obstacles, she was left physically drained, frustrated, and in significant discomfort, making it impossible for her to continue using the sidewalk without experiencing unnecessary suffering.

72.3. The Municipality of Vega Alta holds responsibility for maintaining the sidewalks located in Vega Alta, PR 00692-0000, at coordinates 18.41715778759936, -66.329374472464, in front of CTD Warehouse. Despite its obligation to ensure accessibility for all pedestrians, including individuals with disabilities, these sidewalks remain in a state that prevents Mrs. Cynthia from navigating them safely. The obstacles she encountered caused her significant physical strain and distress, making each attempt to use them an exhausting and frustrating experience. Due to these persistent barriers, she now feels completely discouraged from returning to the area. The Municipality has failed in its duty to maintain accessible pedestrian pathways, leaving Mrs. Cynthia without the ability to move freely and safely.

72.4. To ensure that Mrs. Cynthia E. Concepción Bruno and other individuals with disabilities can navigate the sidewalk in Vega Alta, PR 00692-0000, safely and with dignity, the Municipality of Vega Alta must take immediate corrective measures. First, the municipality must repair the cracked and uneven pavement, ensuring a smooth and stable walking surface that prevents unnecessary strain and risk of injury. Additionally, all obstructing poles should be repositioned or removed to create a clear and unobstructed path. The overgrown vegetation and intrusive tree roots must also be trimmed and properly maintained to prevent further encroachment onto the sidewalk. Furthermore, the Municipality should implement a routine inspection and maintenance plan to ensure that the sidewalk remains accessible in the long term. By taking these essential steps, the Municipality can fulfill its responsibility to provide a safe and accessible public space, alleviating the severe physical strain, muscle spasms, and fatigue that Mrs. Cynthia has endured due to these hazardous conditions.

73. The sidewalk on 17th Street, at the entrance to Sector Ponderosa, Vega Alta, PR 00692-0000, at coordinates 18.41409840855083, -66.32728440865603, is situated near

the food cart Streetd Bulldog Burger Grill & More, an establishment known for its variety of hamburgers and fast-food options. The presence of such places makes this area particularly relevant to Mrs. Cynthia E. Concepción Bruno, as it offers food choices that align with her personal tastes. The availability of diverse dining options in the community adds to the significance of this location for her. However, the accessibility barriers along this sidewalk have turned what should be a convenient route into a frustrating and exhausting challenge, creating unnecessary obstacles that hinder her mobility. Due to these difficulties, she now feels discouraged and unwilling to return, as the conditions in this area make her movement unsafe and restrictive. Until February 2025, she had passed through this area regularly every month, but the ongoing challenges have led her to avoid it entirely. The barriers that Mrs. Cynthia personally identified were:

- 73.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk 17th Street, at the entrance to Sector Ponderosa, Vega Alta, PR 00692-0000, was the absence of a ramp at the corner, which prevented her from safely descending using her rollator walker. Upon reaching the end of the sidewalk, she was forced to stop abruptly and search for an alternative route to continue. Without an accessible ramp, she had to turn back and take a detour, requiring additional physical effort and extending the time she spent on the sidewalk. This unexpected exertion caused muscle strain, worsening the spasms and weakness in her legs caused by her Neuromyelitis Optica. Additionally, the repeated need to maneuver in a confined space forced her into uncomfortable positions, leading to increased lower back pain and muscle stiffness. By the time she finished her route, she felt extremely fatigued and in significant physical discomfort, affecting her ability to carry out the activities she had planned for the day.
- 73.2. In that same sidewalk, at coordinates 18.41403258468816, -66.32688011391902, the width of the sidewalk narrows significantly, becoming so excessively tight that it is completely inoperable for Mrs. Cynthia and her rollator walker. As she attempted to pass through this section, she found herself unable to move forward, as the available space was too restrictive to accommodate her mobility device. This forced her to stop abruptly and attempt to maneuver in an extremely confined space, which required repeated repositioning and excessive physical

effort. The strain caused by these movements intensified the muscle spasms and stiffness associated with her Neuromyelitis Optica, leaving her in severe discomfort and physical distress. The repeated attempts to find a way through only worsened her fatigue and pain, ultimately making it impossible for her to continue using the sidewalk. By the time she was able to exit the area, she felt overwhelmingly exhausted and in significant pain, which disrupted the rest of her planned activities for the day.

73.3. The Municipality of Vega Alta is accountable for maintaining the sidewalks located on 17th Street, at the entrance to Sector Ponderosa, Vega Alta, PR 00692-0000, at coordinates 18.41409840855083, -66.32728440865603, and 18.41403258468816, -66.32688011391902, near the food cart Street Bulldog Burger Grill & More. However, these sidewalks are in such poor condition that they are completely inaccessible to Mrs. Cynthia, subjecting her to unnecessary physical strain and discomfort when attempting to navigate the area. The extreme narrowness in certain sections further exacerbates the issue, making it impossible for her to move safely and independently. The hardships she has endured due to these barriers have left her feeling entirely discouraged from returning. The Municipality has neglected its responsibility to ensure an inclusive and accessible pedestrian environment, directly impacting Mrs. Cynthia's ability to move freely within the area.

73.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk 17th Street, at the entrance to Sector Ponderosa, Vega Alta, PR 00692-0000, including the section at coordinates 18.41403258468816, -66.32688011391902, is fully accessible. This requires the installation of a proper ramp at the corner to allow safe and independent descent, as well as the widening of the excessively narrow section to ensure that individuals using mobility devices, such as a rollator walker, can pass through without obstruction. These modifications are essential to eliminate the physical strain, pain, and unnecessary detours that Mrs. Cynthia has endured while attempting to navigate this area, allowing her to move freely and safely without further hardship.

74. Mrs. Cynthia E. Concepción Bruno frequently walks along the sidewalks on 17th St., Vega Alta, PR 00692-0000, at coordinates 18.415894240090655, -66.32651133752424, as they are located near sites of interest, including Iglesia de Dios MB Roca de Salvación and Iglesia El Shaddai AIC. She appreciates passing by these churches, as the area provides a serene and reflective atmosphere, making it an ideal place for her to enjoy walks. Additionally, this location is close to Bulldog Burger Grill & More, a food establishment known for its fast-food offerings, particularly its burgers, which she finds appealing. The combination of these elements makes the area significant to her. However, due to the numerous obstacles along the sidewalks, she now feels deterred from returning, as the difficulties in navigating the space have created an unwelcoming and restrictive experience. Until February 2025, she had walked through this area regularly every month, but the persistent accessibility issues have forced her to avoid it entirely. The barriers Mrs. Cynthia personally identified were:

- 74.1. The absence of a continuous sidewalk and the presence of narrow sections and sections without sidewalks on 17th St., Vega Alta, PR 00692-0000, forced Mrs. Cynthia E. Concepción Bruno to face great difficulty when attempting to move around. In the areas where there was no sidewalk, she was forced to walk on the roadway, exposing herself to unnecessary physical effort. Her condition of Neuromyelitis Optica made this task even more difficult, as the additional effort to stay stable and avoid falls caused severe fatigue, muscle spasms, and increased muscle stiffness, leading to significant discomfort.
- 74.2. In the narrow sections of the sidewalk, Mrs. Cynthia was unable to maneuver easily with her rollator walker, forcing her to make forced movements and adopt uncomfortable positions. This lack of adequate space to move caused her muscles to tense up quickly, worsening the stiffness in her legs and back and increasing the pain she already experienced due to her health condition. The effort required to navigate these reduced spaces also left her with extreme exhaustion, making it difficult for her to continue walking normally.
- 74.3. The uneven pavement and potholes present in the sidewalk sections also contributed to worsening her situation, as each irregularity in the terrain caused an additional impact on her body, especially her joints and back. These obstacles

forced Mrs. Cynthia to make constant efforts to avoid falls or trips, intensifying muscle spasms and increasing the pain in her spine and limbs, further limiting her mobility and well-being.

- 74.4. Additionally, these same accessibility barriers are present at the coordinates 18.41691850952042, -66.32665098189679, which belong to the same sidewalk. In this area, the narrow sections and lack of pavement continue to hinder Mrs. Cynthia's movement, forcing her to face the same difficulties as in other parts of the road. The presence of uneven pavement and potholes in this section also worsens her situation, making it even harder for her to move safely and comfortably. These barriers continue to negatively affect her well-being, increasing the pain, fatigue, and muscle spasms she already experiences due to her health condition.
- 74.5. The Municipality of Vega Alta is responsible for the sidewalks located on 17th St., Vega Alta, PR 00692-0000, at coordinates 18.415894240090655, -66.32651133752424, near Escuela Bo. La Ponderosa, as well as the area at coordinates 18.41691850952042, -66.32665098189679, which forms part of the same sidewalk. However, these sidewalks are in such a deteriorated state that they are completely inaccessible to Mrs. Cynthia E. Concepción Bruno, subjecting her to physical strain and discomfort whenever she attempts to navigate the area. The challenges and difficulties she has faced due to these barriers have left her feeling entirely discouraged from returning. The Municipality's failure to provide safe and accessible pedestrian pathways has directly impacted her mobility, making it responsible for the hardships she has endured.
- 74.6. The Municipality of Vega Alta can resolve the accessibility barriers along 17th St., Vega Alta, PR 00692-0000, by implementing a continuous and properly designed sidewalk throughout the entire stretch, eliminating sections where no sidewalk exists and widening narrow areas to provide adequate space for individuals using mobility aids such as rollator walkers. Additionally, all sidewalks must be properly paved and leveled to remove potholes and uneven surfaces that pose tripping hazards and increase physical strain. The municipality should also ensure regular maintenance to prevent further deterioration and

maintain a safe and accessible pedestrian route. At coordinates 18.41691850952042, -66.32665098189679, where the same issues persist, these improvements must also be applied to guarantee uniform accessibility throughout the entire area. By addressing these critical deficiencies, the municipality will fulfill its obligation to provide a safe, accessible, and continuous pedestrian infrastructure that allows individuals like Mrs. Cynthia E. Concepción Bruno to navigate the area without unnecessary hardship, ensuring their safety, dignity, and independence.

75. Mrs. Cynthia E. Concepción Bruno has frequently walked along the sidewalk on 3rd St., Vega Alta, PR 00692-0000, at coordinates 18.41655793601849, -66.32620163716089, as it is situated near Escuela Bo. La Ponderosa, a well-established educational institution within the local community. She values this area for its familiar and tranquil atmosphere, making it a pleasant place for her walks. Additionally, the sidewalk is close to Bulldog Burger Grill & More, a well-known food establishment recognized for its fast-food offerings, particularly its burgers, which she finds appealing. The presence of these locations has made this a route she frequently took, as it combined elements of daily life with points of interest. However, due to the persistent accessibility challenges she encounters, she now feels discouraged from returning. What was once a comfortable and familiar path has become an exhausting and frustrating ordeal, making it nearly impossible for her to move through the area without difficulty. Until February 2025, she had regularly passed through this location, but the ongoing barriers have led her to avoid it entirely. The barriers that Mrs. Cynthia personally identified were:

- 75.1. The sidewalk on 3rd St., Vega Alta, PR 00692-0000 has long sections where there is virtually no pavement, forcing Mrs. Cynthia E. Concepción Bruno to walk directly on the roadway. This situation was especially difficult for her, as her condition of Neuromyelitis Optica makes it hard for her to walk steadily for extended periods. Walking on the street, she had to exert extreme effort to maintain balance, which caused her severe fatigue and intensified muscle spasms and stiffness in her legs. The absence of a sidewalk caused evident physical damage, limiting her mobility and causing pain and exhaustion during her walk.

- 75.2. In sections where the sidewalk is narrow, Mrs. Cynthia had to maneuver through tight spaces, increasing the physical effort required with her rollator walker. These forced movements led to significant muscle stiffness, especially in her legs and back, which worsened the pain she already experienced. The discomfort of trying to pass through these narrow sections left Mrs. Cynthia exhausted, preventing her from continuing her walk and causing considerable pain, which further limited her overall mobility and well-being.
- 75.3. The uneven pavement and potholes present on the sidewalk increased the difficulty of walking for Mrs. Cynthia, as each irregularity in the surface required extra effort to maintain her balance. The impact of these irregularities not only intensified the pain in her joints but also forced her to make repetitive movements that triggered additional muscle spasms. This constant physical effort had a negative effect on her body, as the added strain on her spine and limbs caused widespread fatigue and increased physical discomfort, further limiting her ability to walk safely.
- 75.4. In the same area, specifically at coordinates 18.41645809018464, -66.3248370998582, the sidewalk is obstructed by private vehicles. This blockage forced Mrs. Cynthia to navigate around these vehicles, further restricting her ability to pass safely and comfortably. The cars occupying the sidewalk created additional barriers that she had to overcome, causing even more physical strain and discomfort.
- 75.5. Additionally, the sidewalk in this area, specifically at coordinates 18.41645809018464, -66.3248370998582, is narrow, further complicating Mrs. Cynthia's movements. The lack of space to maneuver her rollator walker properly made it extremely difficult for her to pass through without exerting unnecessary effort. This narrowness added to the already challenging conditions of the sidewalk, significantly increasing her fatigue and the discomfort she felt during her walk.
- 75.6. The Municipality of Vega Alta is responsible for maintaining the sidewalks located on 3rd St., Vega Alta, PR 00692-0000, at coordinates 18.41655793601849, -66.32620163716089, near Escuela Bo. La Ponderosa, as

well as the section extending to coordinates 18.41645809018464, -66.3248370998582, which is part of the same walkway. However, these sidewalks are in such poor condition that they are entirely inaccessible to Mrs. Cynthia E. Concepción Bruno, making it extremely difficult for her to move through the area. The obstacles she has encountered have caused her significant physical strain and frustration, ultimately leading her to feel completely discouraged from returning. The Municipality's neglect in maintaining these pedestrian pathways has directly impacted her ability to move safely and independently, making it fully responsible for the barriers she continues to face.

75.7. The Municipality of Vega Alta can resolve the accessibility barriers along 3rd St., Vega Alta, PR 00692-0000, by constructing a continuous, properly paved sidewalk in all sections where none currently exist, eliminating the need for individuals like Mrs. Cynthia E. Concepción Bruno to walk on the roadway. Additionally, all narrow sidewalks must be widened to provide adequate space for maneuvering mobility aids such as rollator walkers, reducing the physical strain caused by forced movements. The municipality must also repair and level the pavement to eliminate potholes and uneven surfaces, preventing tripping hazards and minimizing the risk of muscle strain and fatigue. At coordinates 18.41645809018464, -66.3248370998582, where the sidewalk is obstructed by private vehicles, strict enforcement against illegal parking should be implemented through physical deterrents like bollards or raised curbs, along with clear signage and consistent monitoring. Furthermore, the sidewalk in this area must be widened to ensure sufficient space for safe and comfortable passage. By implementing these measures, the municipality will fulfill its responsibility to provide a fully accessible pedestrian infrastructure, ensuring that individuals with disabilities can navigate the area safely, independently, and with dignity.

76. The sidewalk on 4th St., Vega Alta, PR 00692-0000, at coordinates 18.416827180481274, -66.3252759313167, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is located near Escuela Bo. La Ponderosa. The surrounding environment is peaceful and conducive to reflection, making it a pleasant area for her to take walks and enjoy moments of tranquility. However, the numerous

accessibility barriers along this sidewalk have turned what was once a calming space into a frustrating and exhausting challenge. She now feels dissuaded from returning, as navigating the area has become an overwhelming and physically demanding experience. Until February 2025, she had regularly walked through this area each month, but the ongoing obstacles have forced her to avoid it entirely. The barriers that Mrs. Cynthia personally identified were:

- 76.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on 4th St., Vega Alta, PR 00692-0000, was the near-total lack of sidewalk, which forced her to walk directly on the road, exposing her to unnecessary risks and extreme physical effort. Her condition of Neuromyelitis Optica makes it difficult for her to walk steadily for long periods, and this stretch without a sidewalk caused her severe fatigue and an increase in muscle spasms and stiffness in her legs. Walking on the street, she had to exert considerable effort to maintain her balance, which worsened the pain and discomfort she was already experiencing, preventing her from continuing with her daily activities.
- 76.2. In the sections where the sidewalk was narrow, Mrs. Cynthia had to maneuver through very tight spaces, further increasing the physical effort required to advance with her rollator walker. The repetitive movements and uncomfortable postures forced by the narrowness of the sidewalk caused muscle stiffness, especially in her legs and back, which worsened the pain she was already suffering. These efforts left her exhausted, making it impossible for her to continue her walk and causing significant pain, which further limited her mobility and overall well-being.
- 76.3. Additionally, the uneven pavement and potholes on the sidewalk greatly increased the difficulty of walking, as every irregularity in the surface required extra effort to maintain balance. The impact of these irregularities not only intensified the pain in her joints, but also forced her to make repetitive movements, triggering additional muscle spasms. This constant physical strain affected her body, causing generalized fatigue and increased physical discomfort, further limiting her ability to walk safely.

- 76.4. On the same sidewalk on 4th St., Vega Alta, PR 00692-0000, specifically at coordinates 18.416831973848872, -66.32501775674397, Mrs. Cynthia found that the sidewalk was completely obstructed by weeds, which prevented her from moving smoothly. When attempting to walk through that section, she was forced to navigate around plant obstacles, requiring her to make uncomfortable and repetitive movements to maneuver. This extra effort caused intense pain in her legs and back, exacerbating the muscle spasms and stiffness caused by her Neuromyelitis Optica. The obstruction also made it difficult for her to maintain a stable path, which increased her fatigue and physical discomfort.
- 76.5. Additionally, in the same area, specifically at coordinates 18.416831973848872, -66.32501775674397, the sidewalk was extremely narrow, which forced Mrs. Cynthia to navigate in a very limited space with her rollator walker, making the walk even more difficult. The lack of space to maneuver forced her to adopt uncomfortable and unnatural postures, which increased the pressure on her back and legs. These forced movements intensified the pain and discomfort, leaving her physically exhausted and dissuaded from continuing in the area. The narrowness and obstacles on the sidewalk worsened her health condition, further limiting her mobility and well-being.
- 76.6. The Municipality of Vega Alta is responsible for maintaining the sidewalks located on 4th St., Vega Alta, PR 00692-0000, at coordinates 18.416827180481274, -66.3252759313167, near Escuela Bo. La Ponderosa, despite it bearing the name of a restaurant, as well as at coordinates 18.416831973848872, -66.32501775674397, which are part of the same sidewalk. However, these sidewalks remain in such a deteriorated state that they are entirely inaccessible to Mrs. Cynthia. The physical strain, pain, and discomfort she has experienced while attempting to navigate this area have made it impossible for her to move safely. Due to these persistent barriers, she now feels completely discouraged from returning. The Municipality's failure to maintain safe and accessible pedestrian infrastructure has directly contributed to this situation, depriving Mrs. Cynthia of the ability to move freely and independently in the area.

- 76.7. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure the sidewalk on 4th St., Vega Alta, PR 00692-0000 is fully accessible. This includes rebuilding the sections without sidewalk to create a safe, stable walking path and removing the obstructions caused by weeds at coordinates 18.416831973848872, -66.32501775674397, allowing for smooth and unobstructed passage. The municipality must also widen the narrow sections of the sidewalk to provide sufficient space for mobility devices, such as Mrs. Cynthia's rollator walker, ensuring that she can maneuver without excessive effort. Additionally, the uneven pavement and potholes must be repaired to provide a smooth, safe surface that doesn't cause additional strain or pain. These measures will eliminate the physical strain, muscle spasms, and discomfort that Mrs. Cynthia has endured, enabling her to move freely and safely without unnecessary suffering, and improving her overall well-being and mobility.
77. The sidewalk on 18th St., Vega Alta, PR 00692-0000, at coordinates 18.4175373145876, -66.32332881868187, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is located near Puerto Rico and The World LLC, a space where local businesses promote their services and a spot she appreciates for its inviting and tranquil surroundings. The calm atmosphere in this area makes it a pleasant place for her to walk and unwind. However, the persistent accessibility barriers along this sidewalk have transformed what should be a relaxing experience into a frustrating and exhausting challenge. She now feels discouraged from returning, as the difficulties she faces navigating this area have made it an unwelcoming and restrictive space. Until February 2025, she had regularly walked through this location each month, but the ongoing obstacles have forced her to avoid it altogether. The barriers that Mrs. Cynthia personally identified were:
- 77.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on 18th St., Vega Alta, PR 00692-0000, was the narrowness of the sidewalk, which made it extremely difficult for her to proceed. When attempting to walk through that section, she was forced to maneuver in a very tight space with her rollator walker, which significantly increased the physical effort required to move forward. These

repetitive movements and uncomfortable postures caused intense muscle stiffness, especially in her legs and back, worsening the pain she already suffered from her Neuromyelitis Optica. The additional effort left Mrs. Cynthia extremely fatigued, further limiting her ability to continue her walk and placing a heavy physical burden on her.

77.2. Additionally, the sidewalk was obstructed by what appeared to be weeds, which further exacerbated the difficulty of walking. When attempting to navigate around the plant obstacles, she was forced to make uncomfortable and repetitive movements, which caused intense pain in her legs and back. The obstruction also made it difficult for her to maintain a stable path, which increased her fatigue and physical discomfort. This situation not only worsened her health condition, but also made her feel disheartened and discouraged from continuing in the area due to the suffering it caused her.

77.3. The Municipality of Vega Alta is responsible for maintaining the sidewalk on 18th St., Vega Alta, PR 00692-0000, at coordinates 18.4175373145876, -66.32332881868187. However, these sidewalks are currently in such a deteriorated state that they are completely inaccessible to Mrs. Cynthia, preventing her from moving safely through the area. The difficulties she has faced while attempting to navigate these sidewalks have caused her significant physical strain, pain, and frustration, making each experience exhausting and distressing. As a result, she now feels entirely discouraged from returning. The Municipality's failure to maintain an accessible pedestrian environment has directly contributed to this situation, restricting Mrs. Cynthia's ability to move freely and independently.

77.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure the sidewalk on 18th St., Vega Alta, PR 00692-0000 is fully accessible. The municipality should widen the narrow sections of the sidewalk to provide enough space for mobility devices like Mrs. Cynthia's rollator walker, eliminating the need for her to maneuver in tight spaces. The obstruction caused by weeds must also be cleared to ensure a clear, unobstructed path, allowing for smooth and safe passage.

Furthermore, the municipality should repair any irregularities in the pavement to prevent unnecessary physical strain and discomfort. These actions will eliminate the physical burden and fatigue that Mrs. Cynthia has endured, ensuring that she can move freely and safely, improving her overall mobility and well-being.

78. The sidewalk on 5th St., Vega Alta, PR 00692-0000, at coordinates 18.4170342837846, -66.32349281105122, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is situated near Puerto Rico and The World LLC, a business hub that provides a platform for local enterprises to advertise. This location holds particular interest for her, as the surrounding area offers a serene and peaceful environment, making it a pleasant space for leisurely walks. However, the persistent accessibility barriers have turned what was once a relaxing path into a frustrating and exhausting challenge. She now feels dissuaded from returning, as the obstacles along the sidewalk make safe and comfortable mobility nearly impossible. Until February 2025, she had regularly walked through this area every month, but the ongoing difficulties have forced her to avoid it altogether. The barriers that Mrs. Cynthia personally identified were:

78.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on 5th St., Vega Alta, PR 00692-0000, was the near-total lack of sidewalk, which forced her to walk directly on the road. This situation caused her to exert great physical effort to maintain her balance and move forward, as her Neuromyelitis Optica makes it difficult for her to walk steadily. Walking on the street, instead of a safe sidewalk, intensified her fatigue and muscle spasms in her legs, making each step more painful and exhausting. Being forced to walk in the road also led to increased muscle stiffness, leaving her extremely fatigued, further hindering her ability to continue with her planned activities.

78.2. In addition, the extreme narrowness of the sidewalk further complicated her movement. Mrs. Cynthia had to maneuver in an extremely limited space, which strained her joints and muscles, worsening the pain in her legs and back. The repetitive movements and uncomfortable postures she had to adopt because of the narrowness of the sidewalk caused an increase in muscle stiffness and generalized pain. These efforts left her physically exhausted, making it impossible to continue her walk and significantly limiting her mobility.

- 78.3. Finally, the absence of ramps at the sidewalk corners caused Mrs. Cynthia to backtrack and search for an alternative route to continue, which further increased her physical fatigue and caused additional pain due to the difficulties in finding an accessible path. The lack of ramps greatly hindered her ability to stay stable and move forward without excessive effort, leaving her in a much more physically deteriorated state after attempting to navigate this area.
- 78.4. In the same sidewalk, specifically at coordinates 18.417117589329187, -66.32484802715969, the sidewalk was extremely narrow, which posed another significant challenge for Mrs. Cynthia. As she attempted to walk through this section, she was forced to navigate in a very confined space with her rollator walker, which greatly increased the physical effort required to move forward. The lack of space for maneuvering caused her to adopt uncomfortable and unnatural postures, leading to muscle strain, particularly in her legs and back. These forced movements exacerbated the pain caused by her Neuromyelitis Optica, leaving her physically exhausted and unable to continue her walk. The narrowness of the sidewalk made it impossible for her to walk comfortably and safely, significantly limiting her mobility and well-being.
- 78.5. The Municipality of Vega Alta is responsible for maintaining the sidewalks located on 5th St., Vega Alta, PR 00692-0000, at coordinates 18.4170342837846, -66.32349281105122, as well as at coordinates 18.417117589329187, -66.32484802715969. Despite this obligation, these sidewalks remain in a deteriorated state, making them completely inaccessible to Mrs. Cynthia. The obstacles in this area have caused her significant physical strain and discomfort, turning any attempt to navigate the sidewalks into a distressing and exhausting experience. As a result, she now avoids this location entirely. The Municipality's negligence in maintaining these pedestrian pathways has directly deprived her of safe and independent mobility, leaving her unable to move freely through the area.
- 78.6. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure the sidewalk on 5th St., Vega Alta, PR 00692-0000 is fully accessible. The municipality should rebuild the sections without sidewalk, creating a safe, stable walking path, and

widen the narrow areas to provide enough space for mobility devices like Mrs. Cynthia's rollator walker, allowing her to maneuver without excessive effort. The municipality must also install ramps at the corners of the sidewalk to ensure smooth transitions and prevent the need for detours, eliminating the additional physical strain caused by the lack of accessible paths. These measures will eliminate the physical strain, fatigue, and pain that Mrs. Cynthia has endured, allowing her to move freely and safely without unnecessary suffering, improving her mobility and overall well-being.

79. Mrs. Cynthia E. Concepción Bruno frequently walks along the sidewalk on 2nd St., Vega Alta, PR 00692-0000, at coordinates 18.415929608429725, -66.32544545032772, as it is situated near locations of significance to her, such as Iglesia de Dios MB Roca de Salvación and Iglesia El Shaddai AIC. These churches contribute to a tranquil and contemplative atmosphere, making the area an appealing place for her to take walks and enjoy moments of reflection. However, despite her appreciation for the surroundings, the numerous accessibility barriers present along this sidewalk have made it increasingly difficult for her to navigate safely. She now feels deterred from returning, as the challenges she faces while walking through this area have turned what should be a peaceful experience into a frustrating and exhausting one. Until February 2025, she had passed through this location regularly every month, but the ongoing obstacles have forced her to avoid it entirely. The barriers Mrs. Cynthia personally identified were:

79.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on 2nd St., Vega Alta, PR 00692-0000, was the excessive narrowness of the sidewalk, which greatly hindered her passage. When attempting to walk through this section, she was forced to maneuver in an extremely confined space with her rollator walker, requiring additional physical effort. This narrowness caused joint pain and muscle stiffness, especially in her legs and back, due to the uncomfortable postures she had to adopt in order to move forward. The additional strain left Mrs. Cynthia physically exhausted, limiting her ability to continue her walk and affecting her overall mobility.

79.2. Additionally, the sidewalk was obstructed by vehicles parked on it, making the section completely inoperable for Mrs. Cynthia. When trying to continue walking,

she was forced to step into the road, which increased the physical effort required to maintain her balance. This worsened the muscle pain and spasms caused by her Neuromyelitis Optica, leaving her exhausted and in significant pain. The obstruction of the sidewalk prevented her from moving forward safely and comfortably, further exacerbating her health condition and severely limiting her ability to move independently.

79.3. The Municipality of Vega Alta is responsible for the sidewalk on 2nd St., Vega Alta, PR 00692-0000, at coordinates 18.415929608429725, -66.32544545032772. Despite this responsibility, the poor condition of the sidewalk has made it unusable for Mrs. Cynthia, creating insurmountable barriers that prevent her from navigating the area safely. The physical strain and discomfort she experienced while attempting to traverse this space were overwhelming, turning what should be a routine passage into an ordeal. Frustrated and exhausted by these repeated difficulties, she now avoids the area entirely. The Municipality's neglect has left her without a viable path, restricting her freedom of movement and reinforcing her exclusion from public spaces.

79.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure the sidewalk on 2nd St., Vega Alta, PR 00692-0000 is fully accessible. The municipality should widen the narrow sections to allow enough space for mobility devices, like Mrs. Cynthia's rollator walker, eliminating the need for her to maneuver in confined spaces. The municipality must also enforce parking regulations to prevent vehicles from obstructing the sidewalk, ensuring a clear, safe path for pedestrians. Additionally, the sidewalk surface must be repaired to eliminate any obstacles and provide a smooth, stable walking surface, preventing further strain and discomfort. These actions will remove the physical strain, fatigue, and pain that Mrs. Cynthia has endured, enabling her to move freely and safely without unnecessary suffering, and improving her overall mobility and well-being.

80. Mrs. Cynthia E. Concepción Bruno often walks along the sidewalk on 1st St., Vega Alta, PR 00692-0000, at coordinates 18.4153213922453, -66.3265399991078, as it is situated near locations that hold significance for her, including Iglesia de Dios MB Roca de

Salvación and Iglesia El Shaddai AIC. She values the peaceful and inviting atmosphere of the area, finding it an ideal place for quiet walks that allow for moments of reflection. Additionally, the sidewalk is close to Bulldog Burger Grill & More, a fast-food establishment known for its burgers, making this route particularly relevant to her. However, despite her appreciation for the surroundings, she now feels dissuaded from returning due to the accessibility barriers that make navigating the sidewalks a frustrating and exhausting ordeal. Until February 2025, she had walked through this area regularly each month, but the difficulties she has encountered have forced her to avoid it entirely. The barriers Mrs. Cynthia personally identified were:

- 80.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on 1st St., Vega Alta, PR 00692-0000, was the extreme narrowness of the sidewalk, which made it extremely difficult for her to move. When attempting to walk through this section, she was forced to maneuver in an extremely limited space with her rollator walker, significantly increasing the physical effort required to move forward. This narrowness caused muscle stiffness in her legs and back and worsened the pain caused by her Neuromyelitis Optica. The uncomfortable movements and forced postures due to the lack of space left Mrs. Cynthia extremely fatigued, limiting her ability to continue walking and affecting her overall mobility.
- 80.2. Additionally, in this same section, there were uneven surfaces and potholes, which greatly increased the difficulty of walking for Mrs. Cynthia. Each irregularity in the surface required extra effort to maintain her balance, causing joint pain and worsening muscle spasms. These uneven surfaces also forced Mrs. Cynthia to make repetitive movements, aggravating the discomfort in her spine and legs, leaving her exhausted and in significant physical pain, which forced her to stop her walk.
- 80.3. Finally, the lack of ramps at the corners of the sidewalk caused Mrs. Cynthia to backtrack and search for an alternative route to continue. The absence of ramps added extra physical effort to find an accessible path, which further increased her fatigue and muscle pain. The inability to have a smooth transition at the corners intensified her discomfort and made it difficult for her to move, leaving her in a physically deteriorated condition after attempting to navigate this area.

- 80.4. The Municipality of Vega Alta is responsible for maintaining the sidewalk on 1st St., Vega Alta, PR 00692-0000, at coordinates 18.4153213922453, -66.3265399991078. However, the deteriorated state of this sidewalk has made it completely inaccessible to Mrs. Cynthia, preventing her from navigating the area safely. The obstacles she encountered caused her significant physical strain and discomfort, making each attempt to use the sidewalk an overwhelming challenge. After enduring repeated hardship, she now avoids this location entirely. The Municipality's neglect in maintaining public infrastructure has directly impacted her mobility, leaving her without a safe route and reinforcing the barriers that exclude her from full participation in public life.
- 80.5. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure the sidewalk on 1st St., Vega Alta, PR 00692-0000 is fully accessible. The municipality must widen the sidewalk, ensuring enough space for individuals using mobility aids such as Mrs. Cynthia's rollator walker, so she can walk comfortably without being forced into unnatural positions. Additionally, the uneven pavement and potholes must be repaired to eliminate unnecessary obstacles that worsen her pain and muscle stiffness, allowing for a smooth and stable walking surface. Furthermore, the installation of proper ramps at sidewalk corners is essential to prevent unnecessary detours and excessive physical effort when trying to transition between sidewalks and streets. By making these critical improvements, the municipality will ensure that the sidewalk is no longer an unnecessary source of discomfort and exhaustion for Mrs. Cynthia, restoring her ability to navigate the area independently and without distress.
81. The sidewalk on Aguila St., Vega Alta, PR 00692-0000, at coordinates 18.415700154793466, -66.32071339025447, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is situated near Iglesia de Dios Pentecostal MI Parcelas Carmen. She appreciates the serene and quiet surroundings of the church, which provide a peaceful setting ideal for leisurely walks. The calm atmosphere of this area makes it a space where she can enjoy moments of relaxation and reflection. However, the numerous accessibility barriers along this sidewalk have turned what should be a

soothing experience into a frustrating and exhausting challenge. She now feels discouraged from returning, as the obstacles in this area make safe and independent movement nearly impossible. Until February 2025, she had regularly walked through this location every month, but the persistent difficulties have led her to avoid it entirely. The barriers Mrs. Cynthia personally identified were:

- 81.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on Aguila St., Vega Alta, PR 00692-0000, was its narrow width, which made it extremely difficult for her to walk through using her rollator walker. As she tried to navigate the area, the limited space forced her to make repeated adjustments, straining her muscles and joints. The constant effort to maneuver within the confined space caused severe stiffness in her legs and back, intensifying the pain she already experiences due to her Neuromyelitis Optica. The excessive strain left her exhausted and physically overwhelmed, making it impossible for her to continue her walk as planned.
- 81.2. Additionally, the sidewalk was obstructed by overgrown weeds, further restricting her ability to move. As she attempted to avoid the vegetation, she had to alter her posture and repeatedly shift her weight, which worsened the muscle spasms and discomfort she already suffered. The additional strain from trying to maneuver around the obstacles exacerbated her fatigue and left her with increased pain, making what should have been a simple walk an exhausting and painful experience.
- 81.3. On top of that, privately owned vehicles were parked directly on the sidewalk, making it completely inoperable for Mrs. Cynthia. She was forced to step onto the road, requiring extra effort to maintain her balance, which further aggravated her joint pain and muscle stiffness. The unexpected detour caused excessive fatigue, leaving her physically drained and in significant discomfort. The difficulty she endured while navigating the area left her feeling frustrated and discouraged, ultimately forcing her to abandon her walk.
- 81.4. The Municipality of Vega Alta is responsible for maintaining the sidewalk on Aguila St., Vega Alta, PR 00692-0000, at coordinates 18.415700154793466, -66.32071339025447. However, the sidewalk's current condition has made it

entirely unusable for Mrs. Cynthia, creating obstacles that severely limit her mobility. The difficulties she has faced while attempting to navigate this area have caused her considerable physical strain and distress, turning what should be a simple passage into an exhausting ordeal. As a result, she now avoids the area altogether. The Municipality's failure to uphold its duty in maintaining safe and accessible public pathways has left her without a viable route, further restricting her independence and access to public spaces.

81.5. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk on Aguila St., Vega Alta, PR 00692-0000 is fully accessible. The municipality must widen the sidewalk to provide sufficient space for pedestrians using mobility aids, such as Mrs. Cynthia's rollator walker, allowing her to move without excessive strain. Additionally, the overgrown weeds obstructing the path must be removed and regularly maintained to ensure that the sidewalk remains clear and accessible. The municipality must also enforce parking regulations to prevent private vehicles from blocking the sidewalk, ensuring that pedestrians, especially those with mobility impairments, can use it without being forced onto the roadway. These essential modifications will eliminate the physical strain, exhaustion, and discomfort that Mrs. Cynthia has endured, allowing her to navigate the area independently and without unnecessary hardship.

82. The sidewalk on Monseñor Berrios St., Vega Alta, PR 00692-0000, at coordinates 18.417149020456066, -66.32007038738911, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is situated near Cancha La Inmaculada, a well-maintained court known for its welcoming and community-focused environment. She appreciates the inviting atmosphere of this space, which offers a tranquil setting where she can enjoy the surroundings. The sense of community in this area makes it particularly appealing to her. However, despite her appreciation for the location, she now feels dissuaded from returning due to the numerous accessibility barriers that make navigating the sidewalks a frustrating and exhausting challenge. Until February 2025, she had regularly passed through this area each month, but the ongoing difficulties have forced her to avoid it altogether. The barriers Mrs. Cynthia personally identified were:

- 82.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on Monseñor Berrios St., Vega Alta, PR 00692-0000, was the significant narrowing of the sidewalk, which in certain sections was completely obstructed by overgrown vegetation. As she attempted to navigate through the area, she found herself unable to pass due to the excessive amount of weeds and plant growth blocking the path. This forced her to repeatedly adjust her posture and maneuver awkwardly in an attempt to move forward, placing excessive strain on her muscles and joints. The additional physical effort required to navigate around the obstruction intensified the muscle stiffness and spasms caused by her Neuromyelitis Optica, leaving her in significant pain and discomfort.
- 82.2. As she tried to make her way through the section, she was forced to turn back and search for an alternative route, which not only increased her fatigue and physical strain, but also prolonged the time she had to spend walking. The repetitive strain from attempting to push through the overgrown vegetation worsened the pain in her legs and back, making every movement more exhausting and painful. By the time she finished trying to navigate the sidewalk, she was left physically drained and unable to continue her walk, ultimately forcing her to abandon her route altogether.
- 82.3. In the same sidewalk on Monseñor Berrios St., Vega Alta, PR 00692-0000, specifically at coordinates 18.417192918771846, -66.31995639350374, Mrs. Cynthia encountered the same obstruction caused by overgrown vegetation, which completely blocked her ability to walk through the area. As she attempted to continue, she was forced to stop and attempt to maneuver around the thick weeds, requiring her to shift her weight repeatedly and put additional strain on her muscles and joints. The lack of a clear path resulted in increased stiffness in her legs and back, exacerbating the pain and discomfort she already experiences due to her Neuromyelitis Optica. After multiple attempts to navigate through the section, she was left physically exhausted and in significant pain, ultimately preventing her from continuing her route.
- 82.4. Further along the same sidewalk, at coordinates 18.41714055505645, -66.31981653177029, the overgrown vegetation continued to obstruct the

sidewalk, leaving Mrs. Cynthia no choice but to stop and turn back. The repeated strain of attempting to push forward, only to find herself trapped by the same barriers, worsened her muscle spasms and overall fatigue. The effort required to reposition herself in the limited space intensified her joint pain, making it increasingly difficult for her to maintain her balance and stability. By the time she finished attempting to move through the area, she was left exhausted and in severe discomfort, making it impossible for her to continue using the sidewalk.

82.5. The Municipality of Vega Alta is responsible for maintaining the sidewalk on Monseñor Berrios St., Vega Alta, PR 00692-0000, at coordinates 18.417149020456066, -66.32007038738911, as well as at coordinates 18.417192918771846, -66.31995639350374, and 18.41714055505645, -66.31981653177029. Despite this responsibility, these sidewalks remain in such a deteriorated state that they are entirely impassable for Mrs. Cynthia. The obstacles present in the area have caused her severe physical strain and frustration, making it an exhausting and distressing experience each time she has attempted to navigate them. As a result, she now avoids this location entirely. The Municipality's failure to maintain safe and accessible pedestrian pathways has directly impacted her ability to move freely, leaving her excluded from an area she should be able to access without hardship.

82.6. The Municipality of Vega Alta can resolve the accessibility barriers along Monseñor Berrios St., Vega Alta, PR 00692-0000, by implementing proper maintenance and clearing overgrown vegetation that obstructs the sidewalk, ensuring a continuous and unobstructed pedestrian path. At coordinates 18.417192918771846, -66.31995639350374, and 18.41714055505645, -66.31981653177029, where vegetation has completely blocked the sidewalk, the municipality must trim and remove excessive plant growth, followed by routine maintenance to prevent future obstructions. Additionally, where the sidewalk narrows, the municipality should expand the walkway where feasible to allow adequate space for individuals using mobility aids, reducing the physical strain required to maneuver in tight spaces. By addressing these issues, the municipality will provide a safe, accessible, and navigable pedestrian route, allowing

individuals like Mrs. Cynthia E. Concepción Bruno to move freely, without unnecessary physical effort or risk, ensuring her safety, dignity, and independence.

83. The sidewalk on Padre Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.416912848766756, -66.3189845433429, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is located near a beautiful community park that she enjoys passing by. The park's green spaces and tranquil setting make it an inviting place where she can take short walks and appreciate the peaceful environment. However, despite the appeal of this location, the numerous physical obstacles along the sidewalk have made navigating the area increasingly difficult. She now feels discouraged from returning, as what was once a pleasant and calming experience has turned into an exhausting and frustrating challenge. Until February 2025, she had regularly walked through this area each month, but the persistent barriers have led her to avoid it entirely. The barriers Mrs. Cynthia personally identified were:

- 83.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on Padre Rivera St., Vega Alta, PR 00692-0000, was its excessive narrowness, which made it extremely difficult for her to move using her rollator walker. As she attempted to navigate this section, the limited space forced her to maneuver uncomfortably, increasing the strain on her muscles and joints. The repetitive effort to adjust her positioning caused intense stiffness in her legs and back, exacerbating the pain she already suffers due to her Neuromyelitis Optica. The additional strain left her physically exhausted, preventing her from continuing her walk and limiting her ability to carry out her planned activities.
- 83.2. Additionally, the sidewalk was obstructed by what appeared to be overgrown vegetation, further complicating Mrs. Cynthia's ability to pass through. She was forced to make repeated adjustments, bending and shifting her weight to avoid the obstacles, which worsened her muscle spasms and overall discomfort. The effort to navigate around the obstruction caused increased fatigue and pain, making each step more difficult and physically demanding.
- 83.3. On top of that, several utility poles were positioned directly on the sidewalk, significantly reducing the already limited space. As she attempted to move past

them, Mrs. Cynthia had to twist and contort her body, putting excessive pressure on her joints and muscles, leading to worsened stiffness and soreness. The difficulty of moving through this section left her drained and in severe pain, making it impossible for her to continue using the sidewalk.

83.4. In the same sidewalk on Padre Rivera St., Vega Alta, PR 00692-0000, at the corner where it connects with José Aponte Street, PR 00692-0000 specifically at coordinates 18.417399922879458, -66.3173088453318, Mrs. Cynthia encountered another significant barrier: the complete absence of a ramp. Upon reaching this intersection, she was forced to stop abruptly, as there was no accessible way for her to continue using her rollator walker. The lack of a ramp meant she had to backtrack and search for an alternative route, which prolonged her walk and significantly increased her physical fatigue. The additional exertion required to navigate this obstacle worsened the pain in her legs and back, intensifying the muscle stiffness and spasms caused by her Neuromyelitis Optica. The strain of repeatedly changing directions and the frustration of encountering yet another barrier left her exhausted and in severe discomfort, making it impossible for her to proceed safely through the area.

83.5. The Municipality of Vega Alta is responsible for maintaining the sidewalk on Padre Rivera St., Vega Alta, PR 00692-0000, at coordinates 18.416912848766756, -66.3189845433429, as well as at the corner where it connects with José Aponte Street, PR 00692-0000, at coordinates 18.417399922879458, -66.3173088453318. However, these sidewalks remain in such a deteriorated condition that they are completely inaccessible to Mrs. Cynthia. The obstacles she has encountered have caused her significant physical strain and discomfort, making any attempt to navigate the area a distressing and exhausting ordeal. Frustrated by these continuous barriers, she now avoids this location entirely. The Municipality's negligence in maintaining accessible pedestrian pathways has directly impacted her mobility, further limiting her ability to move freely and safely through public spaces.

83.6. The Municipality of Vega Alta can resolve the accessibility barriers along Padre Rivera St., Vega Alta, PR 00692-0000, by implementing critical modifications to

ensure a safe and accessible pedestrian path. First, the sidewalk must be widened where possible to provide sufficient space for individuals using mobility aids such as rollator walkers, eliminating the excessive strain caused by maneuvering through narrow sections. Second, overgrown vegetation obstructing the sidewalk must be cleared and maintained regularly to prevent future encroachments that force pedestrians to make unsafe adjustments. Third, utility poles positioned directly on the sidewalk should be relocated or alternative solutions should be implemented to ensure an unobstructed passage. At the intersection with José Aponte Street, PR 00692-0000, specifically at coordinates 18.417399922879458, -66.3173088453318, a properly designed and clearly marked ramp must be installed to allow smooth and safe transitions for individuals with mobility impairments, preventing the need for exhausting detours. By addressing each of these barriers, the municipality will fulfill its responsibility to provide a fully accessible pedestrian infrastructure, ensuring that individuals like Mrs. Cynthia E. Concepción Bruno can navigate the area safely, independently, and without unnecessary physical strain.

84. The sidewalk on 14th Colibrí St., Vega Alta, PR 00692-0000, at coordinates 18.414823245406144, -66.32115522512218, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is located near Terra Tile, a business recognized for its extensive selection of high-quality materials for home and commercial renovations. Specializing in tiles, mosaics, and remodeling essentials for kitchens and bathrooms, this store presents an organized and visually appealing storefront that catches her attention. Additionally, the area is close to Sabor Frappé - Vega Alta, a well-known establishment offering a variety of refreshing frappes in a welcoming atmosphere. Nearby is also the Iglesia de Dios Pentecostal MI Parcelas Carmen, a peaceful and inviting place that fosters moments of tranquility and reflection. However, despite her appreciation for these locations, she now feels dissuaded from returning due to the persistent accessibility barriers that make navigating these sidewalks an overwhelming and physically exhausting challenge. Until February 2025, she had walked through this area regularly each month, but the ongoing difficulties have forced her to avoid it entirely. The barriers Mrs. Cynthia personally identified were:

- 84.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on 14th Colibrí St., Vega Alta, PR 00692-0000, was its incorrect dimensions, as it was too narrow for her to walk comfortably using her rollator walker. As she attempted to navigate this section, the insufficient space forced her to maneuver awkwardly, requiring repeated adjustments to her posture and positioning just to continue forward. These constant corrections placed excessive strain on her muscles and joints, significantly increasing the stiffness and discomfort in her legs and back. The repetitive twisting movements necessary to make progress exacerbated her muscle spasms and pain, leaving her physically drained and in severe discomfort.
- 84.2. The inadequate width of the sidewalk made it nearly impossible for Mrs. Cynthia to move without excessive effort, forcing her into unnatural and uncomfortable postures that worsened the symptoms of her Neuromyelitis Optica. The additional strain and prolonged exertion left her exhausted and unable to continue her walk, causing her to abandon her route entirely. The barriers created by the sidewalk's improper dimensions resulted in significant pain and fatigue, further limiting her ability to navigate the area independently.
- 84.3. In the same sidewalk on 14th Colibrí St., Vega Alta, PR 00692-0000, at the intersection with Cisne St., Vega Alta, PR 00692-0000, specifically at coordinates 18.41446441912148, -66.3210948754248, Mrs. Cynthia encountered another significant barrier; the complete absence of a ramp. Upon reaching this intersection, she was forced to stop abruptly, as there was no accessible way for her to continue using her rollator walker. The lack of a ramp prevented her from smoothly transitioning to the next section of the sidewalk, forcing her to backtrack and find an alternative route. This unexpected detour prolonged her walk and caused increased fatigue, exacerbating the muscle stiffness and pain she already experiences due to her Neuromyelitis Optica. The strain of having to change directions multiple times, combined with the frustration of facing yet another obstacle, left her physically exhausted and in severe discomfort, making it impossible for her to proceed safely through the area.
- 84.4. The Municipality of Vega Alta is responsible for maintaining the sidewalk on 14th Colibrí St., Vega Alta, PR 00692-0000, at coordinates 18.414823245406144,

-66.32115522512218, as well as its intersection with Cisne St., Vega Alta, PR 00692-0000, at coordinates 18.41446441912148, -66.3210948754248. However, these sidewalks are currently in such poor condition that they are entirely inaccessible to Mrs. Cynthia. The barriers present have caused her significant physical strain and discomfort, making it extremely difficult for her to navigate the area safely. After enduring repeated challenges and distress, she now avoids this location altogether. The Municipality's failure to ensure accessible pedestrian pathways has severely impacted her mobility, further restricting her independence and ability to move freely through public spaces.

84.5. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk on 14th Colibrí St., Vega Alta, PR 00692-0000, including its intersection with Cisne St., Vega Alta, PR 00692-0000, is fully accessible. The municipality must widen the sidewalk to ensure that individuals using mobility aids, such as Mrs. Cynthia's rollator walker, can move freely without being forced into uncomfortable and strenuous maneuvers. Additionally, the lack of a ramp at the intersection with Cisne St. must be addressed by installing a proper, ADA-compliant ramp, allowing for a smooth transition between sidewalks and eliminating the need for unnecessary detours that increase fatigue and physical strain. These improvements will remove the barriers that caused Mrs. Cynthia pain, exhaustion, and frustration, ensuring that she and other pedestrians can navigate the area safely, independently, and without unnecessary hardship.

85. The sidewalk on Cisne St., Vega Alta, PR 00692-0000, at coordinates 18.41430811773052, -66.32148457839575, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is located near Terra Tile, a well-known business offering a wide range of high-quality materials for home and commercial renovations. Specializing in tiles, mosaics, and remodeling essentials for kitchens and bathrooms, this store adds to the character of the area with its well-organized and visually appealing storefront. Additionally, Sabor Frappé - Vega Alta is nearby, a popular establishment known for its variety of fresh and flavorful frappes, making it a lively and inviting spot in the community. Also in the vicinity is Iglesia de Dios Pentecostal MI Parcelas Carmen, a

peaceful space where Mrs. Cynthia appreciates the serene environment that fosters moments of reflection and tranquility. However, despite her appreciation for these locations, she now feels discouraged from returning due to the accessibility barriers that make navigating these sidewalks an overwhelming and physically exhausting task. Until February 2025, she had regularly walked through this area each month, but the persistent difficulties have forced her to avoid it entirely. The barriers Mrs. Cynthia personally identified were:

- 85.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on Cisne St., Vega Alta, PR 00692-0000, was its excessive narrowness, which made it extremely difficult for her to move using her rollator walker. As she attempted to navigate this section, she was forced to maneuver in an extremely tight space, requiring her to make constant adjustments and repetitive movements to avoid getting stuck between the edges of the sidewalk. This situation placed significant strain on her muscles and joints, causing increased stiffness in her legs and back. The uncomfortable and forced movements she had to make in order to move forward intensified her muscle pain and the spasms caused by her Neuromyelitis Optica, leaving her in a state of extreme exhaustion. The lack of space not only increased her discomfort, but also forced her to cut her route short, as the accumulation of fatigue and pain made it impossible for her to continue her walk.
- 85.2. The Municipality of Vega Alta is responsible for maintaining the sidewalk on Cisne St., Vega Alta, PR 00692-0000, at coordinates 18.41430811773052, -66.32148457839575. However, its current state has rendered it entirely inaccessible to Mrs. Cynthia, creating significant barriers that prevent her from navigating the area safely. The physical strain and discomfort she has endured while attempting to traverse this sidewalk have made it an overwhelming and distressing experience. As a result, she now avoids this location entirely. The Municipality's continued neglect in maintaining accessible pedestrian pathways has directly impacted her ability to move freely, further restricting her access to public spaces.
- 85.3. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk

on Cisne St., Vega Alta, PR 00692-0000 is fully accessible. The municipality must widen the sidewalk to provide sufficient space for pedestrians, especially those using mobility aids like Mrs. Cynthia's rollator walker, allowing her to move safely and without excessive physical strain. Additionally, adjustments must be made to ensure that the sidewalk's dimensions meet accessibility standards, eliminating the need for repetitive, forced movements that cause pain and exhaustion. By making these necessary modifications, the municipality will remove the barriers that left Mrs. Cynthia physically drained and unable to continue her walk, ensuring that she and other pedestrians can navigate the area safely, independently, and without unnecessary hardship.

86. The sidewalk on Calandria St., Vega Alta, PR 00692-0000, at coordinates 18.4134990084808, -66.32198354777935, is a route that Mrs. Cynthia E. Concepción Bruno has frequently passed through, as it is situated near La Pizzelta and Sabor Frappé - Vega Alta, two establishments that draw her attention due to the quality of their offerings and the welcoming ambiance of the area. La Pizzelta, known for its freshly made pizzas with high-quality ingredients, appeals to Mrs. Cynthia for its excellent taste and relaxed atmosphere. Similarly, Sabor Frappé - Vega Alta attracts her with its variety of refreshing frappés, known for their freshness and rich flavors, making it a pleasant spot to stop and unwind. However, despite her interest in these businesses, she now feels dissuaded from returning due to the barriers she faces when navigating the sidewalks. What should be an enjoyable and accessible experience has become physically exhausting and frustrating, making it difficult for her to move through the area freely. Until February 2025, she had regularly passed through this location each month, but the ongoing difficulties have led her to avoid it entirely. The barriers that Mrs. Cynthia personally identified were:

- 86.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on Calandria St., Vega Alta, PR 00692-0000, was its excessive narrowness, which made it extremely difficult for her to navigate using her rollator walker. As Mrs. Cynthia attempted to move through the area, the lack of space forced her to adjust her posture continuously, placing excessive strain on her muscles and joints. The constant maneuvering to avoid obstacles caused an increase in muscle stiffness and spasms, intensifying the pain in her legs and back. This repetitive effort left

Mrs. Cynthia physically exhausted, preventing her from continuing her walk and forcing her to stop earlier than planned.

- 86.2. Additionally, Mrs. Cynthia encountered obstructing utility poles along the already narrow sidewalk, which further reduced the limited space available. She had to twist and reposition herself repeatedly to try to move forward, which exacerbated the discomfort in her spine and limbs. The awkward movements required to pass through these obstructions worsened Mrs. Cynthia's fatigue and pain, increasing her muscle stiffness and spasms. The physical strain caused her severe discomfort, making it impossible for her to continue walking comfortably.
- 86.3. On top of that, Mrs. Cynthia faced another challenge with the sidewalk's cracked and damaged surface, which made it even more difficult for her to move smoothly. The uneven pavement required her to exert extra effort to maintain stability, intensifying the strain on her legs and worsening her muscle pain and spasms. Every step she took required additional effort, leading to heightened fatigue and severe discomfort, affecting the rest of her day.
- 86.4. When it rained, Mrs. Cynthia encountered another major difficulty: the sidewalk became covered in water infiltrations, creating dangerous walking conditions for her. She had to struggle to find dry patches of pavement, requiring constant repositioning and shifts in balance, which added further stress on her already weakened muscles. The added exertion, combined with the pain from the other barriers, left Mrs. Cynthia completely drained and in severe discomfort, making it impossible for her to continue her walk.
- 86.5. In the same sidewalk on Calandria St., Vega Alta, PR 00692-0000, specifically at coordinates 18.413357524484415, -66.32206010062993, Mrs. Cynthia encountered another significant barrier: the complete absence of a ramp at the corner. When she reached this intersection, she was forced to stop abruptly, as there was no accessible way for her to continue using her rollator walker. The lack of a ramp prevented her from smoothly transitioning to the next section of the sidewalk, forcing her to backtrack and search for an alternative route. This unexpected detour prolonged her walk and caused her severe fatigue, exacerbating her muscle stiffness and pain. The excessive physical strain,

combined with the frustration of encountering yet another obstacle, left her exhausted and in significant discomfort, making it impossible for her to continue moving through the area.

- 86.6. At another corner of the same sidewalk, specifically at coordinates 18.413357524484415, -66.32195563788592, Mrs. Cynthia faced the same issue due to the absence of a ramp, once again forcing her to come to a halt. The lack of an accessible transition made it impossible for her to proceed, requiring her to retrace her steps and endure additional physical exertion. The extra effort needed to find another way forward increased her muscle pain and stiffness, leaving her completely exhausted. The repeated struggle to navigate these inaccessible corners worsened her discomfort and fatigue, making her feel frustrated and disheartened, as she was unable to continue her intended route without unnecessary hardship.
- 86.7. The Municipality of Vega Alta is responsible for maintaining the sidewalk on Calandria St., Vega Alta, PR 00692-0000, at coordinates 18.4134990084808, -66.32198354777935, near businesses such as La Pizzelta and Sabor Frappé, as well as its intersections at coordinates 18.413357524484415, -66.32206010062993 and 18.413357524484415, -66.32195563788592. However, the current condition of these sidewalks has made them entirely inaccessible to Mrs. Cynthia, creating significant obstacles that prevent her from navigating the area safely. The difficulties she has encountered have caused her physical strain and discomfort, making each attempt to traverse these sidewalks a frustrating and exhausting ordeal. As a result, she now avoids this area altogether. The Municipality's failure to maintain accessible pedestrian pathways has directly impacted her mobility, further restricting her ability to move freely and independently within this space.
- 86.8. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk on Calandria St., Vega Alta, PR 00692-0000, including its intersections at coordinates 18.413357524484415, -66.32206010062993 and 18.413357524484415, -66.32195563788592, is fully accessible. The sidewalk

must be widened to provide enough space for Mrs. Cynthia and other pedestrians using mobility aids to navigate without excessive physical strain. The utility poles obstructing the passage must be relocated, ensuring a clear and unobstructed path. The damaged and cracked pavement must be repaired, creating an even surface that does not require Mrs. Cynthia to exert extra effort to maintain her balance. Additionally, proper drainage systems must be installed to prevent water infiltration that makes the sidewalk difficult to navigate, especially during rainfall. Finally, the lack of ramps at the intersections must be addressed by installing ADA-compliant curb ramps, allowing Mrs. Cynthia to transition between sidewalks without being forced to retrace her steps and endure unnecessary physical exertion. By implementing these necessary modifications, the municipality will remove the barriers that caused Mrs. Cynthia pain, exhaustion, and frustration, ensuring that she and other pedestrians can navigate the area safely, independently, and without undue hardship.

87. The sidewalk on Zorzal St., Vega Alta, PR 00692-0000, at coordinates 18.41435482310486, -66.31944095675506, is an area that Mrs. Cynthia E. Concepción Bruno has frequently visited, as it is located near several restaurants of interest, such as KFC, Pico Rico BBQ, and McDonald's. KFC, known for its crispy fried chicken and comforting side dishes, is a place Mrs. Cynthia enjoys for its familiar and satisfying meals. Additionally, Pico Rico BBQ, with its selection of grilled meats and traditional barbecue flavors, offers a flavorful and inviting experience that appeals to her. McDonald's also attracts her due to its wide variety of menu options, accessibility, and quick service, making it a convenient choice for a meal at any time. However, despite her appreciation for these establishments and the area, Mrs. Cynthia now feels dissuaded from returning due to the accessibility barriers she faces while attempting to navigate the sidewalks. What should be an enjoyable and simple experience has instead become physically exhausting and frustrating, preventing her from accessing the area freely and comfortably. Until February 2025, she had regularly visited the area each month, but the ongoing difficulties have led her to avoid it entirely. The barriers that Mrs. Cynthia personally identified were:

- 87.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk on Zorzal St., Vega Alta, PR 00692-0000, was its excessive narrowness, which made it extremely difficult for her to pass using her rollator walker. As she attempted to move through the area, the limited space forced her to maneuver uncomfortably, causing strain on her muscles and joints. The constant adjustments she had to make to continue forward worsened the stiffness in her legs and back, making each movement increasingly painful and exhausting. The excessive physical effort required left her fatigued and in significant discomfort, ultimately forcing her to cut her walk short and preventing her from reaching her intended destination.
- 87.2. Additionally, in one of its sections, the sidewalk was almost entirely obstructed by parked private vehicles, making it impossible for Mrs. Cynthia to continue along the path. She was forced to stop and backtrack, searching for an alternative route, which prolonged her walk and caused additional physical exertion. Having to turn around and take a longer path intensified her muscle pain and spasms, increasing her overall exhaustion. The strain of repeatedly encountering impassable obstacles left her feeling drained and discouraged, as she was unable to move through the area freely and without unnecessary hardship.
- 87.3. The Municipality of Vega Alta is responsible for maintaining the sidewalk on Zorzal St., Vega Alta, PR 00692-0000, at coordinates 18.41435482310486, -66.31944095675506. However, the deteriorated state of this sidewalk has rendered it completely inaccessible to Mrs. Cynthia, creating significant obstacles that prevent her from navigating the area safely. The challenges she has faced while attempting to use this sidewalk have caused her considerable physical strain and discomfort, making each attempt an exhausting and frustrating experience. As a result, she now avoids this area altogether. The Municipality's ongoing neglect in ensuring accessible pedestrian infrastructure has directly restricted her mobility, further limiting her independence and safe passage through public spaces.
- 87.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk on Zorzal St., Vega Alta, PR 00692-0000 is fully accessible. The sidewalk must be widened to provide sufficient space for Mrs. Cynthia and other pedestrians

using mobility aids, eliminating the excessive physical strain caused by maneuvering through a tight space. Additionally, the municipality must enforce regulations to prevent private vehicles from obstructing the sidewalk, ensuring that Mrs. Cynthia can pass through without being forced to backtrack and take a longer, more physically demanding route. These measures are essential to eliminating the barriers that caused Mrs. Cynthia pain, exhaustion, and frustration, allowing her and other pedestrians to move through the area safely, independently, and without unnecessary hardship.

88. The sidewalk at 58 Flamenco St., Vega Alta, PR 00692-0000, at coordinates 18.41363199710657, -66.31752559021916, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is located near Pico Rico BBQ, a popular barbecue restaurant known for its delicious grilled meats and flavorful dishes. The smoky aroma and freshly prepared meals, along with the welcoming atmosphere, make this an enjoyable location for Mrs. Cynthia, as she values good food in a comfortable environment. However, despite her interest in this area and the nearby businesses, Mrs. Cynthia now feels dissuaded from returning due to the accessibility barriers she faces when navigating the sidewalks. What should be a simple and enjoyable experience has instead become a physically exhausting and frustrating challenge, making it difficult for her to move through the area freely and comfortably. Until February 2025, she had regularly walked through this area each month, but the ongoing barriers have led her to avoid it entirely. The barriers that Mrs. Cynthia personally identified were:

88.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk at 58 Flamenco St., Vega Alta, PR 00692-0000, was the near-total absence of a sidewalk, which forced her to walk directly on the street. This situation required her to exert significant physical effort to maintain her balance while maneuvering her rollator walker, placing additional strain on her muscles and joints. The lack of a proper pedestrian path caused her to experience increased stiffness and spasms in her legs and back, making each movement increasingly painful and exhausting. The excessive physical exertion left her completely fatigued, preventing her from continuing her planned activities after struggling to navigate through the area.

- 88.2. Additionally, Mrs. Cynthia had to endure bumpy and uneven surfaces, as the area was filled with noticeable potholes and cracks. Each time she encountered these irregularities, she was forced to adjust her movements abruptly, leading to repeated strain on her spine and limbs. The constant jolts and unexpected shifts in movement worsened her muscle spasms and pain, making it even more difficult for her to walk smoothly. By the time she managed to move through the area, she was left exhausted and in severe discomfort, making it impossible for her to continue walking without experiencing intense physical distress.
- 88.3. The Municipality of Vega Alta is responsible for maintaining the sidewalk at 58 Flamenco St., Vega Alta, PR 00692-0000, at coordinates 18.41363199710657, -66.31752559021916, in front of True Value VA Plumbing & Electrical Supply Inc. However, the deteriorated condition of this sidewalk has made it completely inaccessible to Mrs. Cynthia, creating barriers that prevent her from navigating the area safely. The difficulties she has faced while attempting to use this sidewalk have caused her significant physical strain and discomfort, turning each attempt into an exhausting and distressing experience. As a result, she now avoids this location entirely. The Municipality's failure to uphold its responsibility in ensuring accessible pedestrian infrastructure has directly impacted her mobility, further restricting her independence and ability to move freely in public spaces.
- 88.4. To address the barriers identified by Mrs. Cynthia E. Concepción Bruno, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk at 58 Flamenco St., Vega Alta, PR 00692-0000 is fully accessible. A continuous and properly constructed sidewalk must be installed to eliminate the need for Mrs. Cynthia to walk directly on the street, reducing the strain and discomfort she endured. The existing potholes and cracks must be repaired, creating a smooth and stable surface that allows her to move freely without abrupt movements that worsen her pain and muscle spasms. Additionally, the sidewalk must be designed with adequate width to accommodate mobility aids like her rollator walker, preventing her from having to adjust her posture repeatedly. These modifications are essential to removing the barriers that caused Mrs. Cynthia unnecessary pain,

fatigue, and frustration, allowing her and other pedestrians to navigate the area safely, comfortably, and without unnecessary hardship.

89. The sidewalk on Reina St., Vega Alta, PR 00692-0000, at coordinates 18.41504694729579, -66.31997246913532, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is located near several establishments of interest, including Pico Rico BBQ, KFC, and McDonald's. Pico Rico BBQ is known for its flavorful and well-seasoned chicken, offering a satisfying meal for those who enjoy rich and hearty flavors. KFC, with its famous crispy chicken and classic side dishes, is another convenient and tasty option that Mrs. Cynthia enjoys. McDonald's also appeals to her with its variety of menu options and quick service, making it a reliable spot for a meal in a familiar environment. However, despite her interest in the area and these businesses, Mrs. Cynthia now feels dissuaded from returning due to the significant barriers and obstacles she faces while navigating the sidewalks. What should be a comfortable and accessible path has instead become a physically demanding and frustrating challenge, making it difficult for her to move freely and safely. Until February 2025, she had regularly visited the area every month, but the ongoing difficulties have caused her to avoid it altogether. The barriers that Mrs. Cynthia personally identified were:

89.1. One of the barriers that Mrs. Cynthia encountered was the excessive narrowness and uneven surface of the sidewalk, which made it extremely difficult for her to navigate using her rollator walker. As she attempted to pass through the area, the limited space forced her to make continuous adjustments, placing excessive strain on her muscles and joints. The uneven pavement caused abrupt shifts in movement, intensifying the stiffness and spasms in her legs and back. These repeated efforts to maintain her balance left her physically drained, causing intense discomfort and pain that prevented her from continuing her planned activities.

89.2. Additionally, the uneven levels of the sidewalk created an additional challenge, requiring Mrs. Cynthia to exert extra physical effort to compensate for the unstable surface. Each time she encountered a sudden change in elevation, she had to readjust her position, which aggravated the strain on her muscles and worsened her overall fatigue. The constant impact of navigating these

irregularities left her exhausted and in significant pain, making it impossible for her to move comfortably through the area. By the time she reached the end of the sidewalk, she was completely fatigued and physically overwhelmed, forcing her to cut her walk short and limiting her ability to move independently.

89.3. The Municipality of Vega Alta is responsible for maintaining the sidewalk on Reina St., Vega Alta, PR 00692-0000, at coordinates 18.41504694729579, -66.31997246913532. However, its deteriorated state has made it entirely inaccessible to Mrs. Cynthia, presenting obstacles that prevent her from navigating the area safely. The physical strain and discomfort she has endured while attempting to use this sidewalk have turned each effort into an overwhelming and frustrating experience. As a result, she now avoids this location altogether. The Municipality's continued neglect in ensuring accessible pedestrian infrastructure has significantly impacted her mobility, further restricting her ability to move freely and safely in this area.

89.4. To address the barriers encountered by Mrs. Cynthia, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk on Reina St., Vega Alta, PR 00692-0000, at coordinates 18.41504694729579, -66.31997246913532, is fully accessible. The sidewalk must be widened to provide sufficient space for mobility aids like her rollator walker, allowing her to move without excessive strain. Additionally, the uneven pavement must be leveled to eliminate abrupt shifts in movement that exacerbate her muscle spasms and pain. Any elevation changes must be smoothed out, ensuring a continuous and stable walking surface that does not require repeated physical adjustments. These necessary improvements would eliminate the barriers that caused Mrs. Cynthia discomfort, exhaustion, and frustration, allowing her and others with mobility impairments to navigate the area safely and independently.

90. The sidewalk on 105th St., Vega Alta, PR 00692-0000, at coordinates 18.417128369886047, -66.3222736864371, is a route that Mrs. Cynthia E. Concepción Bruno has frequently walked, as it is located near Iglesia de Dios Pentecostal MI Parcelas Carmen. She enjoys the quiet and tranquil atmosphere of the area, which provides a peaceful escape from the noise and distractions of other places. The calm surroundings

allow her to enjoy moments of reflection and relaxation, making it a pleasant space for leisurely walks. However, Mrs. Cynthia now feels dissuaded from returning due to the barriers and obstacles she has encountered along the sidewalks. What used to be a soothing and accessible route has turned into a physically demanding and frustrating challenge, making it difficult for her to move freely and comfortably. Until February 2025, she had regularly passed through this location each month, but the ongoing difficulties have led her to avoid it entirely. The barriers that Mrs. Cynthia personally identified were:

- 90.1. One of the barriers that Mrs. Cynthia encountered on the sidewalk at 105th St., Vega Alta, PR 00692-0000, was the excessive narrowness combined with overgrown vegetation obstructing the path. As she attempted to navigate the area using her rollator walker, she struggled to find enough space to move forward comfortably. The dense vegetation forced her to repeatedly adjust her posture and maneuver through tight spaces, placing significant strain on her muscles and joints. These constant readjustments worsened the stiffness in her legs and back, causing intense discomfort and exacerbating her muscle spasms, which are a symptom of her Neuromyelitis Optica.
- 90.2. The limited space available on the already narrow sidewalk made every step increasingly difficult, as Mrs. Cynthia had to carefully reposition herself to avoid getting entangled in the vegetation. This unnecessary exertion led to severe fatigue, making it impossible for her to continue walking without experiencing intense pain and physical exhaustion. By the time she managed to exit the obstructed area, she was completely drained, frustrated, and left in significant discomfort, preventing her from completing her intended walk.
- 90.3. The Municipality of Vega Alta is responsible for maintaining the sidewalk on 105th St., Vega Alta, PR 00692-0000, at coordinates 18.417128369886047, -66.3222736864371. However, the poor condition of this sidewalk has made it entirely inaccessible to Mrs. Cynthia, creating significant obstacles that prevent her from safely navigating the area. The challenges she has encountered while attempting to use this sidewalk have caused her substantial physical strain and discomfort, turning each attempt into a distressing and exhausting ordeal.

Frustrated by these continuous difficulties, she now avoids this location altogether. The Municipality's failure to maintain an accessible pedestrian route has directly restricted her mobility, further limiting her independence and safe passage through public spaces.

- 90.4. To address the barriers encountered by Mrs. Cynthia, the Municipality of Vega Alta must take immediate action to ensure that the sidewalk on 105th St., Vega Alta, PR 00692-0000, at coordinates 18.417128369886047, -66.3222736864371, is fully accessible. The sidewalk must be widened to provide sufficient space for individuals using mobility aids like her rollator walker, allowing her to move without excessive strain. Additionally, all overgrown vegetation obstructing the path must be cleared, ensuring an uninterrupted pedestrian route that does not force her to maneuver uncomfortably. Any uneven pavement or damaged surfaces must be repaired and leveled, eliminating unnecessary physical strain and allowing for smooth and safe mobility. By implementing these necessary improvements, the Municipality of Vega Alta can eliminate the barriers that caused Mrs. Cynthia physical pain, exhaustion, and frustration, allowing her and others with mobility impairments to navigate the area safely and independently.

**d. The Municipality of Vega Alta's Failure to Ensure Accessibility in Public Spaces**

91. The Municipality of Vega Alta has continuously failed to address the accessibility barriers that prevent Ms. Cynthia E. Concepción Bruno from moving safely and independently within her community. The sidewalks and curb ramps in various locations throughout Vega Alta, as identified in this Complaint, are in a state of severe disrepair. These essential pedestrian pathways, which should be accessible to individuals with disabilities, instead feature cracks, uneven surfaces, hazardous elevation changes, and obstructions that significantly impede Ms. Concepción's safe passage with her rollator walker. Additionally, the presence of illegally parked vehicles blocking sidewalks and curb ramps further exacerbates these accessibility issues, forcing her to navigate unsafe and precarious alternatives simply to reach her intended destination.
92. Despite its responsibility to ensure accessibility, the Municipality of Vega Alta has failed to enforce proper maintenance and compliance with the Americans with Disabilities Act (ADA) and other applicable accessibility standards. Its inaction has not only rendered

sidewalks and curb ramps inaccessible but has also significantly obstructed Ms. Concepción's ability to move safely and independently within her community. As a result, she has been forced to avoid entire areas due to hazardous conditions that pose a serious risk to her safety and mobility.

93. The Municipality of Vega Alta has also failed to regulate parking violations, allowing vehicles to obstruct curb ramps and pedestrian pathways, further restricting Ms. Cynthia Concepción Bruno'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, Ms. Concepción is often unable to access sidewalks and public spaces, forcing her to alter her plans, take unsafe routes, or abandon her intended destinations altogether.
94. This pattern of inaction extends beyond sidewalks and parking areas to the public infrastructure that Ms. Cynthia Concepción Bruno relies on for daily mobility. Many sidewalks and curb ramps in Vega Alta are in severe disrepair, featuring damaged pavement, narrow pathways, and improperly designed curb ramps that create hazardous conditions for individuals with mobility impairments. The Municipality of Vega Alta has long been aware of these barriers but has neglected to take corrective action or enforce compliance with accessibility laws. This lack of enforcement has allowed these dangerous conditions to persist, severely restricting Ms. Concepción's ability to move safely and independently throughout her community.
95. By knowingly allowing these barriers to persist, the Municipality of Vega Alta has systematically denied Ms. Cynthia Concepción Bruno equal access to public spaces. Its failure to maintain sidewalks, regulate parking, and enforce accessibility standards demonstrates a blatant disregard for the rights and safety of individuals with disabilities. As a result, Ms. Concepción is frequently forced to navigate unsafe conditions or refrain from accessing areas she would otherwise visit, effectively excluding her from fully participating in her own community.
96. The Municipality of Vega Alta's continued inaction constitutes a failure to fulfill its legal obligation to ensure accessibility, leaving Ms. Cynthia Concepción Bruno and others with mobility disabilities at a constant and unjust disadvantage.

**e. Violations of Title II of the Americans with Disabilities Act (ADA) by the Municipality of Vega Alta**

97. The Municipality of Vega Alta, as the entity responsible for maintaining public infrastructure, is subject to the requirements of Title II of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12131 et seq., which mandates ensuring accessibility and equitable participation for individuals with disabilities in public spaces. Despite this legal obligation, the Municipality continues to allow inaccessible sidewalks and curb ramps to persist, effectively violating the ADA by failing to provide safe and accessible pedestrian pathways for individuals like Ms. Cynthia Concepción Bruno.
98. The Municipality of Vega Alta has failed to comply with the ADA by maintaining architectural barriers that prevent Ms. Cynthia Concepción Bruno from freely accessing public sidewalks and curb ramps. These violations include, but are not limited to:
  - 98.1. Sidewalks in severe disrepair, including cracked, uneven, or obstructed pedestrian pathways, making safe access impossible for individuals who rely on mobility aids such as rollator walkers.
  - 98.2. Damaged or improperly designed curb ramps, with excessive slopes, cracks, or missing detectable warnings, creating hazardous conditions that make navigation unsafe or impossible.
  - 98.3. Obstructions caused by illegally parked vehicles, blocking sidewalks and curb ramps, further restricting Ms. Concepción's ability to move freely and safely.
99. The Municipality of Vega Alta has an affirmative legal duty to ensure that public sidewalks, curb ramps, and pedestrian pathways within its jurisdiction comply with accessibility requirements and remain free from barriers that obstruct individuals with mobility impairments. However, the Municipality has systematically failed to fulfill this obligation, thereby creating an environment that is unsafe, exclusionary, and discriminatory for individuals with disabilities, such as Ms. Cynthia Concepción Bruno.
100. The Municipality of Vega Alta bears direct responsibility for the ongoing maintenance, repair, and regulation of sidewalks and curb ramps throughout the municipality, including those identified in this Complaint, which Ms. Cynthia Concepción Bruno relies on for mobility. This responsibility extends to ensuring that pedestrian pathways are maintained in an accessible condition, free from hazardous defects, and that they comply with the

2023 Public Right-of-Way Accessibility Guidelines (PROWAG) and other applicable accessibility standards.

101. Despite this legal obligation, the Municipality of Vega Alta has allowed public sidewalks and curb ramps to remain in severe disrepair, with broken pavement, cracks, potholes, and abrupt transitions that make them impassable for individuals using rollator walkers or other mobility aids. Additionally, the Municipality has failed to regulate illegal parking practices, resulting in vehicles obstructing curb ramps and pedestrian pathways, further restricting Ms. Cynthia Concepción Bruno's ability to navigate these areas independently and safely.
102. The lack of enforcement and corrective action by the Municipality of Vega Alta has subjected Ms. Cynthia Concepción Bruno 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.
103. The sidewalk system throughout Vega Alta serves as an essential pedestrian route for Ms. Cynthia Concepción Bruno and other individuals with disabilities. However, due to the negligence of the Municipality of Vega Alta, 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, such as rollator walkers.
104. By allowing these barriers to persist, the Municipality of Vega Alta is 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 Municipality's failure to implement and enforce accessibility regulations constitutes

discrimination in a pattern and practice of exclusion, depriving Ms. Cynthia Concepción Bruno and others with mobility disabilities of their right to full and equal access to public spaces.

**f. Violation of Section 504 of the Rehabilitation Act by the Municipality of Vega Alta**

105. 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 a recipient of federal funds, the Municipality of Vega Alta is legally obligated to ensure accessibility and prevent discrimination against individuals with disabilities in all services, programs, and activities under its jurisdiction, including the maintenance and regulation of public sidewalks, curb ramps, and pedestrian pathways.
106. Despite this clear legal obligation, the Municipality of Vega Alta has engaged in systemic discrimination by failing to take affirmative actions to remove architectural barriers from its pedestrian infrastructure and by allowing sidewalks to be blocked by illegally parked vehicles. The Municipality's continued inaction and failure to enforce accessibility regulations have directly resulted in the exclusion of Ms. Cynthia Concepción Bruno from a fundamental public service—safe and accessible pedestrian pathways.
107. This failure constitutes a clear violation of Section 504 and reflects intentional discrimination against Ms. Cynthia Concepción Bruno based on her disability. The Municipality of Vega Alta has been fully aware of the hazardous conditions of its sidewalks and curb ramps, including broken pavement, missing landing areas, potholes, cracks, and abrupt level changes, yet has chosen not to take corrective measures. Additionally, the Municipality has failed to implement parking enforcement policies, allowing vehicles to illegally obstruct designated pedestrian access points, curb ramps, and sidewalks, further restricting Ms. Concepción's ability to navigate her community safely.

**III. SECOND CAUSE OF ACTION: 42 U.S.C. § 1983 CLAIMS  
ALLEGATIONS OF RETALIATORY BLOCKING OF MRS. CONCEPCIÓN FROM  
THE MUNICIPAL FACEBOOK PAGE**

**g. Preliminary Statement, Jurisdiction and Venue**

108. The Municipality of Vega Alta operates an official Facebook page called "Noticias Municipio de Vega Alta", which serves as an important channel of communication between the government and residents. The link to the official Facebook page "Noticias Municipio de Vega Alta," managed by the Municipality of Vega Alta, is:

<https://www.facebook.com/profile.php?id=100064074547555>. (hereinafter, the "Municipal Page")

109. The Municipal Page disseminates critical public information, including announcements about roadwork, construction projects, public events, and emergency preparedness information, including tsunami warnings and procedures.
110. Defendants have engaged in viewpoint discrimination in violation of the First Amendment by blocking Ms. Concepción from accessing or commenting on the Municipal Page solely because she expressed opinions that Defendants deemed unfavorable or because she directed another resident to seek help from a specific municipal department for a community issue.
111. Through this action, Ms. Concepción seeks declaratory relief, injunctive relief, and damages to remedy Defendants' unconstitutional blocking of her from the Municipal Page.
112. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1343(a)(3) and (4).
113. This Court has authority to issue declaratory and injunctive relief pursuant to 28 U.S.C. §§ 2201 and 2202.
114. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) because the events giving rise to the claims occurred in this district, and all parties reside in this district.

#### **h. The Municipal Page as a Public Forum**

115. The Municipal Page is an official government communication channel operated by the Municipality of Vega Alta to inform residents about municipal services, activities, and matters of public concern.
116. Defendants Municipality of Vega Alta, Mayor of Vega Alta María M. Vega Pagán, In Her Official and Personal Capacities; John/Jane Doe(s), administrators of the “Noticias Municipio de Vega Alta” Facebook page, in their official and personal capacities, are responsible for overseeing and managing the Municipal Page. As Mayor of Vega Alta, María M. Vega Pagán oversees municipal operations, including official communications, and has the authority to regulate and enforce policies regarding the Municipal Page. The John/Jane Doe(s), as administrators of the Municipal Page, control its content, manage

posts, moderate discussions, and determine which users can participate in public discourse on the platform.





117. The following image is a representative sample of the Facebook page "Noticias Municipio de Vega Alta," managed by the Municipality of Vega Alta, which, as of the filing date of this complaint, has 35,000 followers:



118. Defendants have engaged in viewpoint discrimination in violation of the First Amendment by blocking Ms. Concepción from accessing or commenting on the Municipal Page solely because she expressed opinions that Defendants deemed unfavorable or because she directed another resident to seek help from a specific municipal department for a community issue.
119. The Municipal Page is accessible to the general public and allows members of the public to follow the page, receive updates, and interact with posts by commenting, sharing, or liking content.
120. The Municipal Page regularly publishes crucial information about municipal services, including but not limited to: a. Emergency alerts and public safety warnings; b. Announcements about road paving projects and construction works; c. Information about public events sponsored by the Municipality; d. Emergency preparedness information, including tsunami warnings and protocols; e. Public health information; f. General municipal announcements affecting residents.
121. This information is not consistently available through other municipal communication channels, making the Municipal Page a central and essential information source for Vega Alta residents.

122. The Municipal Page enables and encourages public interaction by allowing residents to comment on posts and engage in discussions related to municipal matters.
123. By creating and maintaining the Municipal Page, Defendants have intentionally opened a forum for public speech on matters related to municipal governance and community affairs.
124. The page is operated under the authority of Mayor of Vega Alta María M. Vega Pagán, In Her Official and Personal Capacities, with content regularly referencing her official acts, municipal departments, public services, and municipal resources, clearly establishing its governmental and official character.

**i. Categories of Critical Information with Specific Examples**

125. Based on analysis of 500 posts from the Municipal Page, the following categories of critical public information are regularly disseminated through this channel:
  - 125.1. Emergency Alerts: Emergency Alerts include time-sensitive announcements regarding natural disasters, road closures, emergency preparedness, evacuation notices, tsunami warnings, and public safety threats. These posts receive an average of 41 shares per post - the highest share rate of any content category - demonstrating their critical public importance.
    - 125.1.1. Specific examples include:
      - a. March 10, 2025 - Fire Warning: " Precaución - Fuego en maleza en PR-675 en Bajura, no hay acceso al lugar. El viento está empujando el humo directamente al sector Candungo. Personas Asmáticas y con padecimientos respiratorios deben tomar las debidas precauciones." This post received 40 likes and 40 shares, demonstrating its critical public safety importance.
      - b. March 5, 2025 - Emergency Training Program: " ¡Atención, Vega Alta!  Manejo de Emergencias de Vega Alta te invita a participar en el Programa CERT, ¡completamente gratis!  Estamos organizando un adiestramiento abierto al público general..." This post about emergency preparedness received 23 likes and 19 shares.
  - 125.2. Public Services Announcements: Public Services Announcements include information about municipal services, water outages, utility services, waste

collection schedules, and other essential services that directly impact residents' daily lives. These posts receive an average of 24 shares per post.

- 125.2.1. Specific examples include: a. March 10, 2025 - Public Service Announcement regarding debris collection: "📣 PROTECCIÓN AMBIENTAL | RECOGIDO DE ESCOMBROS | PRÓXIMA RUTA 📣  
✅ Iniciando desde el martes 31 de marzo. ✅ Breñas y todas sus calles..."

This municipal service announcement received 8 likes and 3 shares. b.

March 10, 2025 - Cultural Department Registration: "El Departamento de Cultura y Turismo de Vega Alta informa que se ha extendido la matrícula para las clases de Chocolatería, Charcutería y Artes Plásticas..." This announcement received 9 likes and 4 shares.

- 125.3. Infrastructure Projects: Infrastructure Projects include updates on road construction, pavement projects, public works, sidewalk repairs, and other infrastructure developments directly affecting accessibility, transportation, and municipal development.

- 125.3.1. Specific examples include: a. March 10, 2025 - Asphalt Works: "Aviso Importante - A Partir de hoy comienzan trabajos de asfalto en la Zona Urbana. Hoy estarán en la calle Luis Méndez Class (es la carretera que divide ambos edificios del mall)." This infrastructure alert received 80 likes and 30 shares. b. March 8, 2025 - Roadway Maintenance: "ORNATO | Nuestras brigadas de corazón finalizaron su trabajo semanal de Ornato y Embellecimiento en la carretera estatal número 694. #BrigadasdeCorazón #ElCorazónDelNorte" This post received 32 likes and 2 shares.

- 125.4. Health Information: Health Information includes critical public health advisories, vaccination information, health service availability, and wellness programs available to Vega Alta residents.

- 125.4.1. Specific examples include: a. February 27, 2025 - Health Fair: "HOY| Feria "Yo elijo estar en salud" de Triple S Advantage en colaboración con el Municipio Autónomo de Vega Alta." This public health event announcement received 124 likes and 10 shares.

125.5. Public Safety Information: Public Safety Information includes crime alerts, police updates, and public safety initiatives that directly impact resident security.

125.5.1. Specific examples include: a. February 10, 2025 - Utility Safety Work:

"⚠️ 🚧 LUMA INFORMA 🚧 Como parte del Plan de Manejo de Vegetación, mañana martes 11 de Febrero, se estará realizando trabajos de poda y desgancho en varios puntos de la PR 678 en el Bo. Pampanos de Vega Alta..." This utility work notification received 40 likes and 31 shares.

b. December 27, 2024 - Police Department Update: "AHORA | El Comisionado de la Policía Municipal de Vega Alta CAP. Efrain Quintero, Recibe 2 nuevas unidades Police Intersector. #ElCorazonDelNorte" This public safety resource update received 214 likes and 19 shares.

125.6. Community Events: Community Events include information about municipal activities, educational opportunities, and cultural events sponsored or promoted by the Municipality.

125.6.1. Specific examples include: a. March 8, 2025 - Women's Day Celebration:

"En este Día Internacional de la Mujer, nuestra alcaldesa María M. Vega Pagán, rinde homenaje a la fuerza, valentía y determinación de cada una de ustedes..." This community celebration post received 27 likes and 2 shares.

125.7. Municipal Information: Municipal Information includes general governmental updates, administrative announcements, public meetings, and municipal services.

125.7.1. Specific examples include: a. December 10, 2024 - Resident Achievement

Recognition: "¡Felicidades a Franlisse Acevedo Resto, joven de raíces vegalteñas, por ganar la medalla de oro en los 50m libre en el Campamento Nacional de Piscina Corta en San Juan! ¡Un gran logro!" This municipal recognition received an extraordinary 2,243 likes and 78 shares.

#### **j. Mrs. Concepción's Engagement**

126. Analysis of engagement metrics clearly demonstrates the essential public forum function of the Municipal Facebook page: a. Emergency Alerts generate the highest rate of public sharing (average 41 shares per post), demonstrating their critical public safety function. b.

Community Events posts generate the highest average likes (145 likes per post), demonstrating significant public interest in municipality-sponsored activities. c. Public Services posts generate substantial engagement (average 67 likes, 24 shares, and 37 comments per post), reflecting their importance to residents' daily lives. d. Infrastructure Projects posts generate significant engagement (average 94 likes, 15 shares per post), demonstrating public interest in municipal development. e. The overall high engagement across all categories (average 95 likes, 19 shares, and 23 comments per post) demonstrates the page's central role in public discourse about municipal affairs.

**k. Mrs. Concepción's Engagement on the Municipal Page and the Retaliatory Blocking**

127. Mrs. Concepción has been an active, respectful participant in community affairs in Vega Alta for many years.
128. Prior to being blocked, Ms. Concepción regularly followed the Municipal Page to stay informed about community events, municipal services, and emergency information.
129. Mrs. Concepción has consistently maintained a respectful tone in all her digital communications, including her interactions on the Municipal Page. She has never used profanity, threatening language, or engaged in harassing behavior in her online communications.
130. In or around April 2024, Ms. Concepción commented on a post made by a friend and fellow Vega Alta resident, Ms. Sonia Santiago (sister of Mr. William Santiago, who is the owner of the Vega Alta AA baseball team). Ms. Santiago had posted expressing concerns about the lack of lighting at the Julio "Papo" Dávila baseball park: "falta de iluminación de el parque de pelota Julio (Papo) Dávila y que se vieron a en la obligación de trasladar a el equipo de jugadores hasta Cataño" [Translation: "lack of lighting at the Julio (Papo) Dávila baseball park and that they were forced to relocate the team of players to Cataño"]. Ms. Concepción politely suggested in the comments that Ms. Santiago should bring this complaint to the attention of the Director of the Recreation and Sports Department of the municipality.
131. Shortly after posting this comment, Mrs. Concepción discovered that she had been blocked from the Municipal Page, preventing her from viewing content, commenting on posts, or otherwise interacting with this important source of municipal information.

132. Upon information and belief, Ms. Concepción was blocked solely because her comment was perceived as casting the municipal administration in a negative light or challenging municipal authority by directing a resident to a specific department.
133. Mrs. Concepción has never received any explanation for why she was blocked from the Municipal Page, nor was she given any opportunity to appeal this decision. This practice of blocking critics without explanation or recourse has been confirmed by multiple other residents of Vega Alta who have experienced similar treatment, as Mrs. Concepción can attest with specific names and details of individuals who have shared their experiences of being blocked after expressing critical opinions.

**l. Pattern of Viewpoint Discrimination**

134. Upon information and belief, numerous other Vega Alta residents have also been blocked from the Municipal Page after expressing views perceived as critical of municipal operations or the current administration.
135. Upon information and belief, numerous other Vega Alta residents have also been blocked from the Municipal Page after expressing views perceived as critical of municipal operations or the current administration.
136. Upon information and belief, Defendants do not have any content-neutral, viewpoint-neutral policy governing the blocking of users from the Municipal Page.
137. Upon information and belief, no users who express positive or neutral views about the Municipality are blocked from the Municipal Page, regardless of the relevance or substance of their comments.

**m. Concrete Harm to Ms. Concepción**

138. As a result of being blocked from the Municipal Page, Ms. Concepción has been unable to access important municipal announcements about: a. Emergency Alerts and Public Safety Warnings: As demonstrated by the March 10, 2025 fire alert which received 40 shares, the Municipality uses Facebook as its primary channel for disseminating time-sensitive public safety information. Being blocked prevents Ms. Concepción from receiving these critical safety alerts directly and immediately. b. Roadwork and Infrastructure Projects: The March 10, 2025 asphalt work announcement (80 likes, 30 shares) demonstrates how the Municipality uses Facebook to alert residents about infrastructure projects. Ms. Concepción's blocking prevents her from learning about these

projects that directly impact her mobility through the municipality - particularly critical given her documented mobility challenges. c. Public Service Announcements: The March 10, 2025 debris collection announcement (8 likes, 3 shares) shows how the Municipality communicates essential service information. Ms. Concepción's blocking prevents her from accessing this information needed to properly maintain her residence and comply with municipal regulations. d. Public Health Information: The February 27, 2025 health fair announcement (124 likes, 10 shares) demonstrates the Municipality's use of Facebook to inform residents about health resources. Ms. Concepción, as a person with documented medical conditions, is prevented from receiving this information directly. e. Community Resources and Opportunities: The March 10, 2025 cultural department registration extension (9 likes, 4 shares) exemplifies municipal program announcements. Ms. Concepción's blocking prevents her from learning about these educational and cultural opportunities available to Vega Alta residents.

139. Mrs. Concepción has been prevented from participating in public discussions on matters of community importance on the Municipal Page.
140. Ms. Concepción has been forced to rely on secondhand information about municipal affairs, which is often incomplete or delayed.
141. Ms. Concepción has suffered emotional distress as a result of being excluded from this important public forum simply for expressing her views.
142. The inability to access information directly from the Municipal Page has caused Ms. Concepción to miss community events and be unaware of important municipal activities affecting her neighborhood.

**n. Violation of the First Amendment to the United States Constitution (42 U.S.C. § 1983)**

143. Plaintiff repeats and realleges the allegations in paragraphs 1 through 76 as if fully set forth herein.
144. The First Amendment to the United States Constitution prohibits government actors from restricting speech on the basis of the speaker's viewpoint.
145. The Municipal Page constitutes a designated public forum or, alternatively, a limited public forum, for speech.
146. By operating the Municipal Page in a manner that allows for public comments and interaction, Defendants created a forum for speech by members of the public.

147. Ms. Concepción's comments on the Municipal Page, including her suggestion to another user to contact a specific municipal department, constitute protected speech under the First Amendment.
148. Defendants, acting under color of state law, violated Ms. Concepción's First Amendment rights by blocking her from the Municipal Page based on the viewpoint she expressed.
149. Defendants have no significant government interest that would justify blocking Ms. Concepción from the Municipal Page.
150. Even if Defendants could articulate a legitimate government interest, blocking Ms. Concepción from the entire Municipal Page is not narrowly tailored to serve that interest and burdens substantially more speech than necessary.
151. As a direct and proximate result of Defendants' actions, Ms. Concepción has suffered and continues to suffer irreparable harm, including the deprivation of her constitutional rights, inability to access important public information, and inability to participate in public discourse on matters affecting her community.

**o. Jury Demand**

152. Plaintiff demands a trial by jury on all issues so triable.

#### **IV. PRAYER FOR RELIEF**

**WHEREFORE**, the plaintiff, Cynthia Concepcion respectfully requests that this Honorable Court grant the following legal remedies:

**A. First Cause of Action: Title II of the Americans with Disabilities Act and Section 504 Of the Rehabilitation Act, 29 U.S.C.**

1. Issuance of a permanent injunction under Section 504 of the Rehabilitation Act, Title II of the ADA, and the 2023 Public Right-of-Way Accessibility Guidelines (PROWAG) against the Municipality of Vega Alta, ordering it to:
  - 1.1. Remove all existing architectural barriers on sidewalks, curb ramps, and pedestrian pathways within its jurisdiction that prevent safe access for individuals with mobility disabilities, including hazardous conditions such as cracks, potholes, abrupt level changes, and improperly designed curb ramps.
  - 1.2. Ensure that all sidewalks, curb ramps, and pedestrian routes comply with federal accessibility requirements, eliminating unsafe conditions that restrict the mobility of individuals using rollator walkers and other assistive devices.

- 1.3. Develop and implement a detailed accessibility remediation plan with specific deadlines, which shall include:
  - 1.3.1. A comprehensive inventory of all non-compliant sidewalks and curb ramps under its jurisdiction.
  - 1.3.2. A binding timeline for the repair, modification, and/or reconstruction of these pedestrian pathways.
  - 1.3.3. The establishment of a regular inspection and enforcement system to ensure continued compliance with accessibility standards and the prevention of illegal parking that obstructs curb ramps and pedestrian pathways.
2. An order directing the Municipality of Vega Alta to implement and enforce parking regulations that prevent vehicles from blocking curb ramps and sidewalks, ensuring that designated pedestrian access points remain unobstructed.
3. An order directing the Municipality of Vega Alta to pay nominal damages to the plaintiff for its violations of Title II of the ADA, Section 504 of the Rehabilitation Act, and the 2023 PROWAG, acknowledging the deprivation of her right to safe and accessible public spaces.
4. An order directing the Municipality of Vega Alta to pay compensatory damages under Title II of the ADA and Section 504 of the Rehabilitation Act, in recognition of the emotional distress, loss of mobility, and exclusion from community life suffered by Ms. Cynthia Concepción Bruno due to the Municipality's ongoing discrimination.
5. Retention of jurisdiction by this Honorable Court to monitor, ensure, and oversee compliance with its orders directing the Municipality of Vega Alta to fulfill its legal obligations under federal accessibility laws, including Title II of the ADA and Section 504 of the Rehabilitation Act.

**B. Second Cause of Action: 42 U.S.C. § 1983 Claims**

6. Declare that Defendants' blocking of Ms. Concepción from the Municipal Page based on her viewpoint violates the First Amendment to the United States Constitution;
7. Issue a preliminary and permanent injunction ordering Defendants to:
  - 7.1. Immediately unblock Ms. Concepción from the Municipal Page;

- 7.2. Restore Ms. Concepción's full access to the Municipal Page, including the ability to view, comment on, and otherwise interact with content;
- 7.3. Cease and desist from blocking or restricting access to the Municipal Page based on viewpoint;
- 7.4. Develop and implement a constitutional policy governing the moderation of comments on the Municipal Page;
- 7.5. Preserve all digital records of blocked users and the reasons for blocking them;
8. Award compensatory damages in an amount to be determined at trial for the violation of Ms. Concepción's First Amendment rights;
9. Award nominal damages for the violation of Ms. Concepción's constitutional rights;
10. Award punitive damages against the individual Defendants in their official and personal capacities;

**C. General Relief Requested**

11. An order directing the defendants to pay reasonable costs, litigation expenses, and attorneys' fees, pursuant to 20 U.S.C. § 1415(i)(3)(B).
12. Any other relief that this Court deems just, equitable, and appropriate in the interest of ensuring accessibility and non-discrimination against individuals with disabilities.

**Dated:** March 11, 2025.

**RESPECTFULLY SUBMITTED.**

**VELEZ LAW GROUP LLC**  
Civil Rights Division

s/José Carlos Vélez Colón  
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