

United States District Court
SOUTHERN DISTRICT OF CALIFORNIA

ORIGINAL

GYPSIE JONES,

Plaintiff,

vs.

YOUNG PUBLICANS, LLC dba HOOLEY'S IRISH
PUB & GRILL.

Defendants.

SUMMONS IN A CIVIL ACTION

Case No.
05cv1276 L (AJB)

TO: (Name and Address of Defendant)


YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court and serve upon PLAINTIFF'S ATTORNEY

Lynn Hubbard III, SBN 69773
Scottlynn J Hubbard IV, SBN 212970
LAW OFFICES OF LYNN HUBBARD
12 Williamsburg Lane
Chico, CA 95926

An answer to the complaint, which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

CLERK W. Samuel Hamrick, Jr.

DATE 6-29-05

By , Deputy Clerk

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

GYPSIE JONES

COPY

DEFENDANTS JUN 23 AM 11:01

YOUNG PUBLICANS, LLC dba HOOLEY'S IRISH PUB & GRILL.

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Shasta
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OR RESIDENCE OF FIRST LISTED DEFENDANT DEWITT
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Lynn Hubbard, III, Esq.
Law Offices of Lynn Hubbard, 12 Williamsburg Lane,
Chico, CA 95926

ATTORNEYS (IF KNOWN)

06 CV 1276 L (AJB)

II. BASIS OF JURISDICTION (PLACE AN "X" IN ONE BOX ONLY)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

VI. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 680 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 881 Agricultural Acts <input type="checkbox"/> 882 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 990 Other Statutory Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input checked="" type="checkbox"/> 448 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence HABEAS CORPUS: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition			

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL UNLESS DIVERSITY.)

42 U.S.C. Section 12101, et seq.
Ongoing violations of the ADA Construction Standards

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **CLASS ACTION** **DEMAND \$** Excess \$75,000.00 **CHECK YES only if demanded in complaint: JURY DEMAND:** YES NO

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE June 16, 2005 SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

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LYNN HUBBARD, III, SBN 69773
SCOTTLYNN J HUBBARD, IV, SBN 212970
LAW OFFICES OF LYNN HUBBARD JUN 23 AM 11:01
12 WILLIAMSBURG LANE
CHICO, CA. 95926
(530) 895-3252

DEPUTY

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

GYPSIE JONES

Plaintiff,

vs.

YOUNG PUBLICANS, LLC dba
HOOLEY'S IRISH PUB & GRILL.

Defendant,

'05 CV 1276 (AJE)
No.
Plaintiff's Complaint

Jones v. Hooley's Irish Pub & Grill
Plaintiff's Complaint

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I. SUMMARY

1. This is a civil rights action by plaintiff Gypsie Jones (“Jones”) for discrimination at the building, structure, facility, complex, property, land, development, and/or surrounding business complex known as:

Hooley's Irish Pub & Grill
2955 Jamacha Road, #21A-C
El Cajon, CA 92019
(hereafter “the Restaurant”)

2. Jones seeks exemplary damages, injunctive and declaratory relief, attorney fees and costs, against Young Publicans, LLC dba Hooley's Irish Pub & Grill (collectively “Hooley's ”) pursuant to the Americans with Disabilities Act of 1990,(42 U.S.C. §§ 12101 et seq.), and related California statutes.

II. JURISDICTION

3. This Court has original jurisdiction under 28 U.S.C. §§ 1331 and 1343 for ADA claims.

4. Supplemental jurisdiction for claims brought under parallel California law—arising from the same nucleus of operative facts—is predicated on 28 U.S.C. § 1367.

5. Jones' claims are authorized by 28 U.S.C. §§ 2201 and 2202.

III. VENUE

6. All actions complained of herein take place within the jurisdiction of the United States District Court, Southern District of California, and venue is invoked pursuant to 28 U.S.C. § 1391(b), (c).

IV. PARTIES

7. Hooley’s owns, operates, or leases the Restaurant, and consists of a person (or persons), firm, or corporation.

Jones v. Hooley's Irish Pub & Grill
Plaintiff's Complaint

1 an allegation that Jones is seeking to remove barriers unrelated to her
2 disability.

3 13. Hooley's knew that these elements and areas of the Restaurant
4 were inaccessible, violate state and federal law, and interfere with (or deny)
5 access to the physically disabled. Moreover, defendant has the financial
6 resources to remove these barriers from the Restaurant (without much
7 difficulty or expense), and make the facility accessible to the physically
8 disabled. To date, however, defendant refuses to either remove those
9 barriers or seek an unreasonable hardship exemption to excuse non-
10 compliance.

11 VI. FIRST CLAIM

12 **Americans with Disabilities Act of 1990**

13 Denial of "Full and Equal" Enjoyment and Use

14 14. Jones incorporates the allegations contained in paragraphs 1
15 through 13 for this claim.

16 15. Title III of the ADA holds as a 'general rule' that no individual
17 shall be discriminated against on the basis of disability in the full and equal
18 enjoyment (or use) of goods, services, facilities, privileges, and
19 accommodations offered by any person who owns, operates, or leases a
20 place of public accommodation. 42 U.S.C. § 12182(a).

21 16. Hooley's discriminated against Jones by denying "full and
22 equal enjoyment" and use of the goods, services, facilities, privileges or
23 accommodations of the Restaurant during each visit and each incident of
24 deterrence.

25 Failure to Remove Architectural Barriers in an Existing Facility

26 17. The ADA specifically prohibits failing to remove architectural
27 barriers, which are structural in nature, in existing facilities where such
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Jones v. Hooley's Irish Pub & Grill
Plaintiff's Complaint

1 removal is readily achievable. 42 U.S.C. § 12182(b)(2)(A)(iv). The term
2 “readily achievable” is defined as “easily accomplishable and able to be
3 carried out without much difficulty or expense.” Id. § 12181(9).

4 18. When an entity can demonstrate that removal of a barrier is not
5 readily achievable, a failure to make goods, services, facilities, or
6 accommodations available through alternative methods is also specifically
7 prohibited if these methods are readily achievable. Id. § 12182(b)(2)(A)(v).

8 19. Here, Jones alleges that Hooley’s can easily remove the
9 architectural barriers at the Restaurant without much difficulty or expense,
10 and that Hooley’s violated the ADA by failing to remove those barriers,
11 when it was readily achievable to do so.

12 20. In the alternative, if it was not “readily achievable” for
13 Hooley’s to remove the Restaurant’s barriers, then Hooley’s violated the
14 ADA by failing to make the required services available through alternative
15 methods, which are readily achievable.

16 Failure to Design and Construct an Accessible Facility

17 21. On information and belief, the Restaurant was designed or
18 constructed (or both) after January 26, 1992—independently triggering
19 access requirements under Title III of the ADA.

20 22. The ADA also prohibits designing and constructing facilities
21 for first occupancy after January 26, 1993, that aren’t readily accessible to,
22 and usable by, individuals with disabilities when it was structurally
23 practicable to do so. 42 U.S.C. § 12183(a)(1).

24 23. Here, Hooley’s violated the ADA by designing or constructing
25 (or both) the Restaurant in a manner that was not readily accessible to the
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1 physically disabled public—including Jones—when it was structurally
2 practical to do so.¹

3 Failure to Make an Altered Facility Accessible

4 24. On information and belief, the Restaurant was modified after
5 January 26, 1992, independently triggering access requirements under the
6 ADA.

7 25. The ADA also requires that facilities altered in a manner that
8 affects (or could affect) its usability must be made readily accessible to
9 individuals with disabilities to the maximum extent feasible. 42 U.S.C. §
10 12183(a)(2). Altering an area that contains a facility's primary function also
11 requires adding making the paths of travel, bathrooms, telephones, and
12 drinking fountains serving that area accessible to the maximum extent
13 feasible. Id.

14 26. Here, Hooley's altered the Restaurant in a manner that violated
15 the ADA and was not readily accessible to the physically disabled public—
16 including Jones—to the maximum extent feasible.

17 Failure to Modify Existing Policies and Procedures

18 27. The ADA also requires reasonable modifications in policies,
19 practices, or procedures, when necessary to afford such goods, services,
20 facilities, or accommodations to individuals with disabilities, unless the
21 entity can demonstrate that making such modifications would fundamentally
22 alter their nature. 42 U.S.C. § 12182(b)(2)(A)(ii).

23 28. Here, Hooley's violated the ADA by failing to make reasonable
24 modifications in policies, practices, or procedures at the Restaurant, when
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28 ¹ Nothing within complaint should be construed as an allegation that plaintiff is bringing this
action as a private attorney general under either state or federal statutes.

1 these modifications were necessary to afford (and would not fundamentally
2 alter the nature of) these goods, services, facilities, or accommodations.

3 29. Jones seeks all relief available under the ADA (*i.e.*, injunctive
4 relief, attorney fees, costs, legal expense) for these aforementioned
5 violations. 42 U.S.C. § 12205.

6 30. Jones also seeks a finding from this Court (*i.e.*, declaratory
7 relief) that Hooley's violated the ADA in order to pursue damages under
8 California's Unruh Civil Rights Act or Disabled Persons Act.

9 VII. SECOND CLAIM

10 **Disabled Persons Act**

11 31. Jones incorporates the allegations contained in paragraphs 1
12 through 30 for this claim.

13 32. California Civil Code § 54 states, in part, that: Individuals with
14 disabilities have the same right as the general public to the full and free use
15 of the streets, sidewalks, walkways, public buildings and facilities, and
16 other public places.

17 33. California Civil Code § 54.1 also states, in part, that:
18 Individuals with disabilities shall be entitled to full and equal access to
19 accommodations, facilities, telephone facilities, places of public
20 accommodation, and other places to which the general public is invited.

21 34. Both sections specifically incorporate (by reference) an
22 individual's rights under the ADA. See Civil Code §§ 54(c) and 54.1(d).

23 35. Here, Hooley's discriminated against the physically disabled
24 public—including Jones—by denying them full and equal access to the
25 Restaurant. Hooley's also violated Jones' rights under the ADA, and,
26 therefore, infringed upon or violated (or both) Jones's rights under the
27 Disabled Persons Act.

28 **Jones v. Hooley's Irish Pub & Grill**
Plaintiff's Complaint

1 with physical disabilities. Accordingly, she seeks injunctive relief and
2 attorney fees pursuant to Health and Safety Code § 19953.

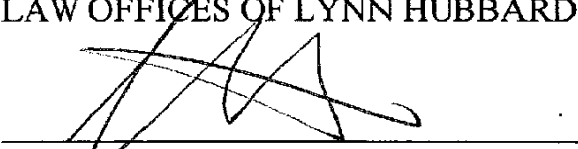
3 X. PRAYER FOR RELIEF

4 WHEREFORE, Jones prays judgment against Hooley's for:

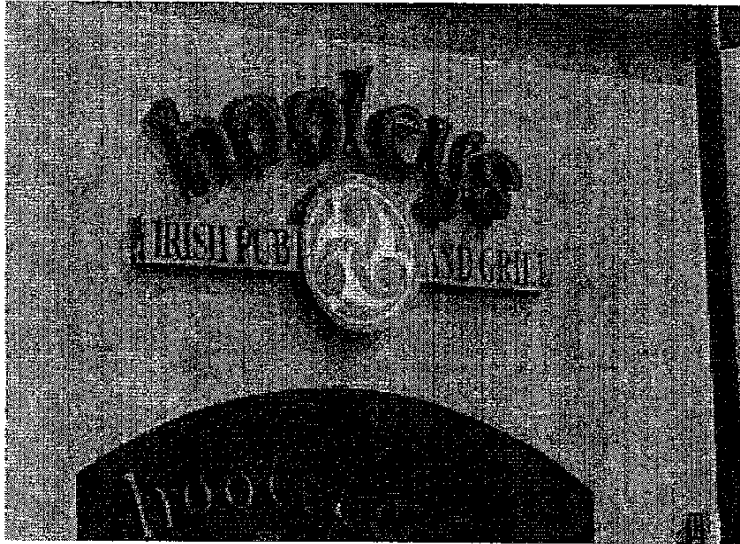
- 5 1. Injunctive relief, preventive relief, or any other relief the Court deems
6 proper.
- 7 2. Declaratory relief that Hooley's violated the ADA for the purposes of
8 Unruh Act or Disabled Persons Act damages.
- 9 3. Statutory minimum damages under either sections 52(a) or 54.3(a) of
10 the California Civil Code (but not both) according to the proof.
- 11 4. Attorneys' fees, litigation expenses, and costs of suit.²
- 12 5. Interest at the legal rate from the date of the filing of this action.
- 13 6. Such other and further relief as the court may deem proper § 3294.

14
15 DATED: June 16, 2005

LAW OFFICES OF LYNN HUBBARD

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18 _____
19 LYNN HUBBARD, III
20 Attorney for Jones
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28 ² This includes attorneys' fees under California Code of Civil Procedure § 1021.5.
Jones v. Hooley's Irish Pub & Grill
Plaintiff's Complaint



PRELIMINARY SITE ACCESSIBILITY REPORT

***Hooley's
2959 Jamacha Road
El Cajon, California***

HOOLEY'S
2959 Jamacha Road
El Cajon, CA

DSA pg 2&3

1. Tow away sign posted at wrong height.

SEE PHOTO No. 1

1129 B
Fig 21

2. Tow away sign has no phone number.

DOT #R100B

3. Tow away sign wrong color.

SEE PHOTO No. 2

1129B.5 4.6.4

4. Incorrect parking signage. No separate van accessible sign.

SEE PHOTO Nos. 3 and 4

1129 B.5.1&2 4.6.4

5. Accessible parking space and access aisle not outlined white.

CVC 21 458(a)(3)(A)

6. Access aisle not striped in white.

1129B.4.1
Fig 11 B-18 A

7. Missing no parking painted in accessible aisle.

SEE PHOTO No. 5

1127 B. 5.8

8. No detectable warnings.

1127 B.5.8 4.29.2

9. Detectable warning not visually contrasting, light on dark or dark on light.

1102 B.2.6 4.3
DSA pg 2D&3D

10. No accessible route of travel from parking.
Stop signs not painted for crossing vehicular path.

SEE PHOTO No. 6

1127 B.	36.304	11. No exterior route of travel from the property border.
1127 B.	4.3.2	12. No exterior route of travel from parking.
1127 B. 3		13. No exterior route of travel signs.
1124 B.3	4.5.3	14. Floor mats are not attached.
1117 B.5 Fig 11 B-6	4.30	15. Entrance door has no ISA.
1122 B. 4 Fig 11B- 5D and F	4.32.3	16. Bar counter does not have a section 28 to 34 inches high and 36 inches wide and 24 inches deep maximum to accommodate a wheelchair occupant.
1122 B. 3	4.32.2	17. Bar seating does not offer 19 inches before an obstruction to accommodate a wheelchair occupant.
1117 B. 5.8.1 Fig 11 B. - 6	4.30.7 Fig 43	18. Bar seating has no ISA.
1122 B. 3	4.32.3	19. Dining room booths do not have 30 inches between cushions.
1122 B. 3	4.32.2	20. Dining room seating does not offer 19 inches before an obstruction to accommodate a wheelchair occupant.
1117 B. 5.8.1 Fig 11 B. - 6	4.30.7 Fig 43	21. Dining room seating has no ISA.
1117 B. 5.4 1117 B. 5.1.3	4.1.2 (7) (d)	22. No directional signage to the restroom.
1115 B. Fig 82		23. Restrooms signs incorrect shape, triangle for men, circle for women.
1117 B. 5.6.3	4.1.3 (16) (a)	24. Restroom signs are not on the wall, latch side.
1117 B. 5.5.3	4.30.4	25. Restroom door sign has no ISA, wall mounted, latch side.

- | | | |
|--------------------------------|---------------|---|
| 1117 B. 5.6.3 | 4.30.4 | 26. Restroom door signs do not have a verbal description below the ISA, latch side. |
| 1115 B. 5 | 4.30.4 | 27. Restroom door not identified in Braille, latch side. |
| 1117 B. 5.1.1
1117 B. 5.6.3 | 4.1.2 (7) (d) | 28. Restroom signs are not centered 60 inches from the floor, latch side. |

SEE PHOTO No. 7

- | | | |
|--------------|--------|---|
| 1133 B.2.5.2 | 4.13.9 | 29. Inside restroom door does not have accessible handle. |
|--------------|--------|---|

SEE PHOTO No. 8

- | | | |
|-----------------------------------|------------------|--|
| 1115B. 7.1.4 | | 30. Stall door not self closing. |
| 1133 B. 2.4.2
Fig 11 B. - 26 A | 4.13.6
Fig 25 | 31. Clearance for side strike area on interior doors is not 18 inches on the pull side and 12 inches on the push side. |

SEE PHOTO No. 9

- | | | |
|-------------|--------|---|
| 1115B.7.1.4 | 4.17.5 | 32. Outside stall door does not have accessible handle. |
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SEE PHOTO No. 10

- | | | |
|---------------|--------|---|
| 1115 B. 7.1.4 | | 33. Inside stall door does not have accessible handle. |
| 1115 B.7.1.4 | | 34. Inside stall door handle not mounted below latch. |
| 1115 B. 7.1.4 | 4.13.9 | 35. Stall door does not have flip or sliding latch. This is a sliding latch, however, it does require manual dexterity. |

SEE PHOTO No. 11

1117 B. 6.4 4.27.4 36. Coat hook 60 inches from the floor.

SEE PHOTO No. 12

1115 B.7.1.4 4.17.3
Fig 30 37. Accessible stall not minimum 60 inches wide.

4.17.3
Fig 30 38. Water closet center 36 inches from the wall or
other partition, not 42 inch minimum.

1115 B. 7.1.3 39. Side of water closet 30 inches from the wall or
other partition not 32 inch minimum.

1102 B 4.3 40. Short side wall is an obstruction to the water
closet.

SEE PHOTO Nos. 13 and 14

4.17.3
Fig 30 41. Toilet tissue dispenser leading edge is 42
inches from back wall, not 36 inches maximum.

SEE PHOTO Nos. 15 and 16

1133 B.8.6.1 4.4.1 42. Toilet tissue dispenser protrudes more than 4
inches from wall.

SEE PHOTO No. 17

1115B. 9 2
Fig 11B-1A 43. Seat cover dispenser operable part 48 inches
from floor, and mounted over the grab bar.

SEE PHOTO No. 18

1115 B. 2.1.2.1
Fig 11 B. -D 44. Center of lavatory 9 inches from the wall not
18 inch minimum.

1102 B 4.3 45. Trash can is an obstruction to the towel
dispenser.

SEE PHOTO No. 19

1115 B.2.1.2.1
Fig 11 B. -D

4.19.2
Fig 31

46. Drainpipes under lavatory 10 inches from the wall not 6 inch maximum.

1115 B. 2.1.2.2

4.19.4

47. Hot water and drainpipes are not insulated.

SEE PHOTO No. 20

THESE VIOLATIONS WERE FOUND IN THE WOMEN'S RESTROOM. ADDITIONAL VIOLATIONS MAY BE FOUND IN THE MEN'S RESTROOM.

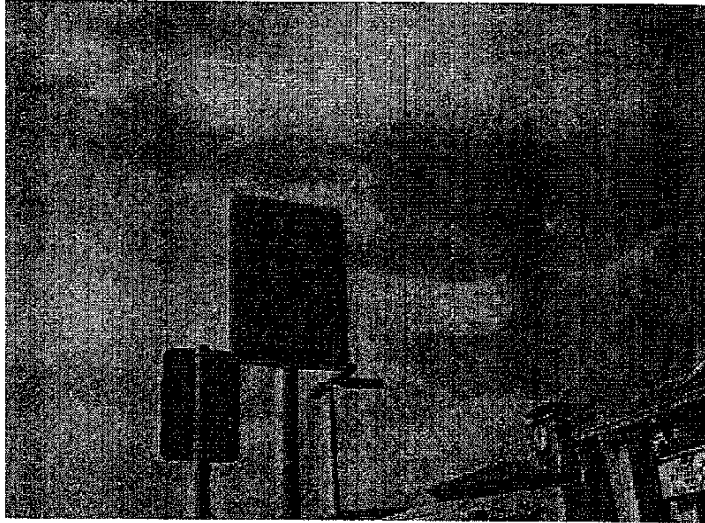
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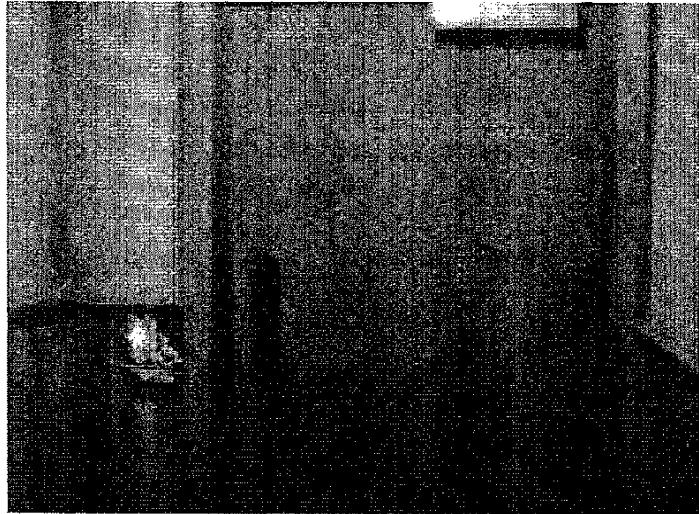
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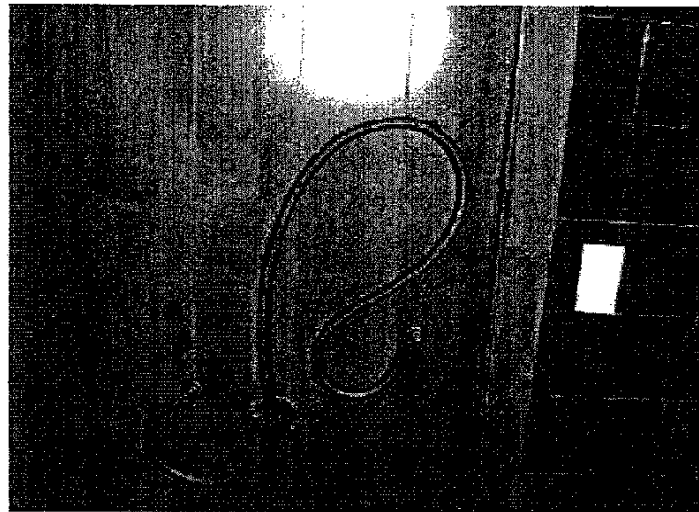
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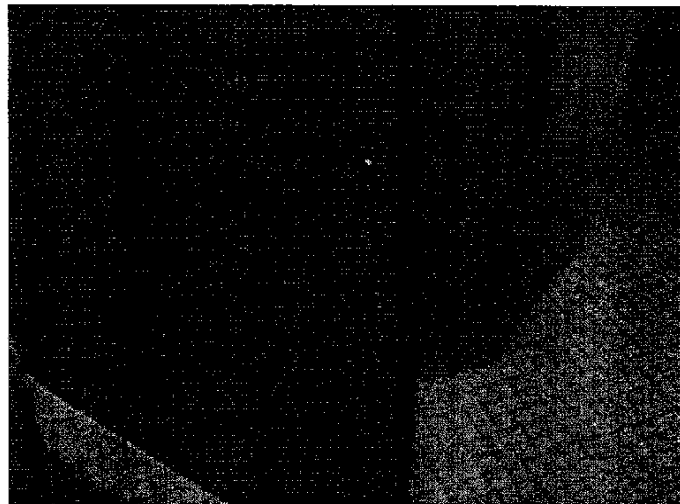
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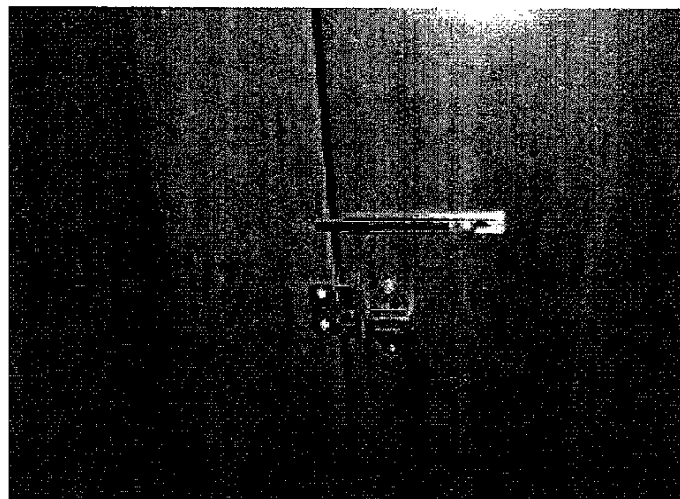
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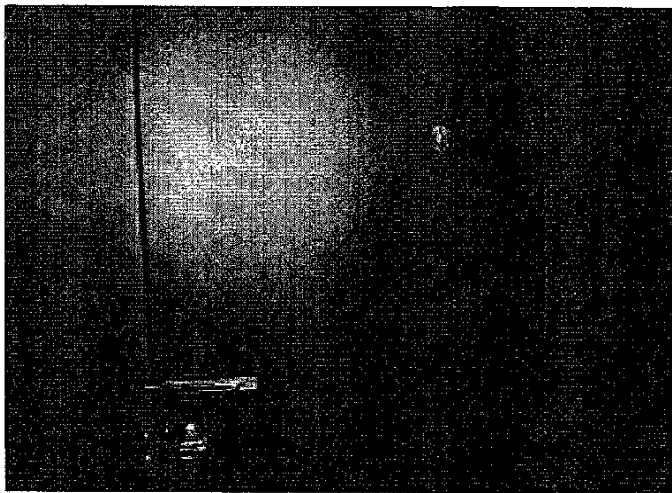
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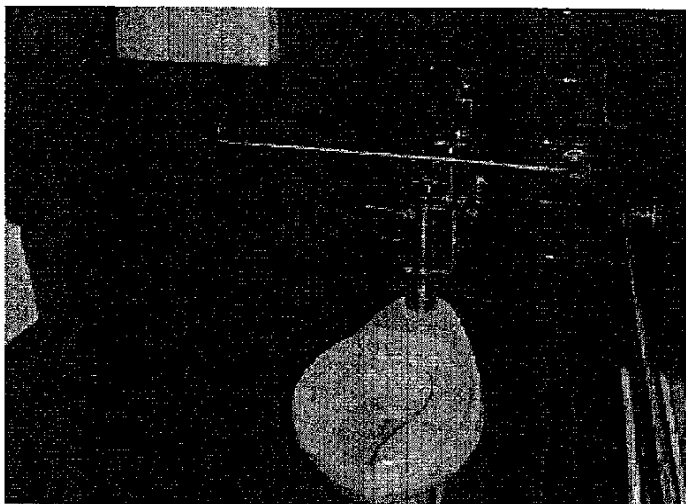
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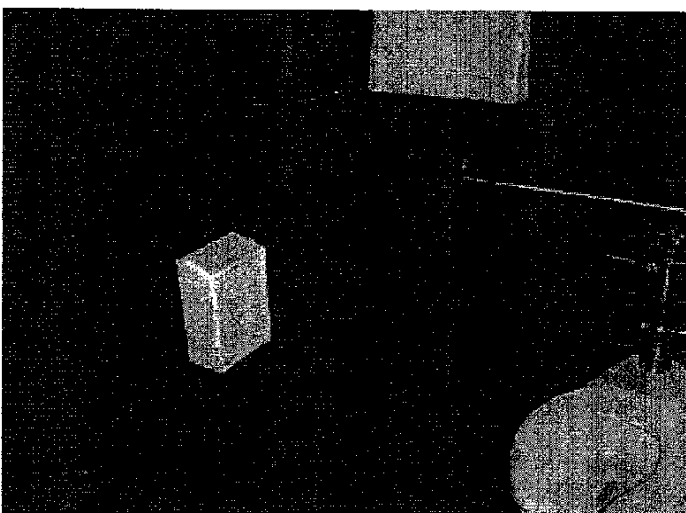
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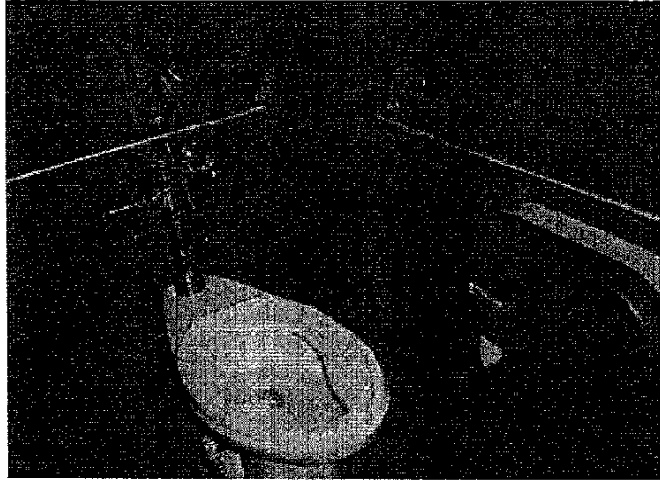
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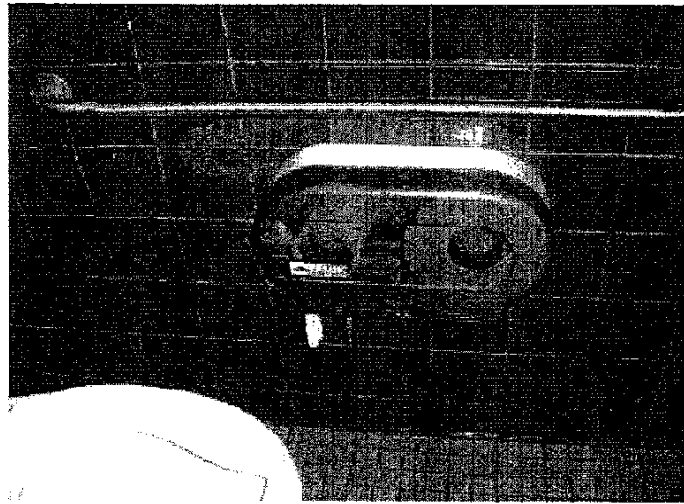
14.



15.



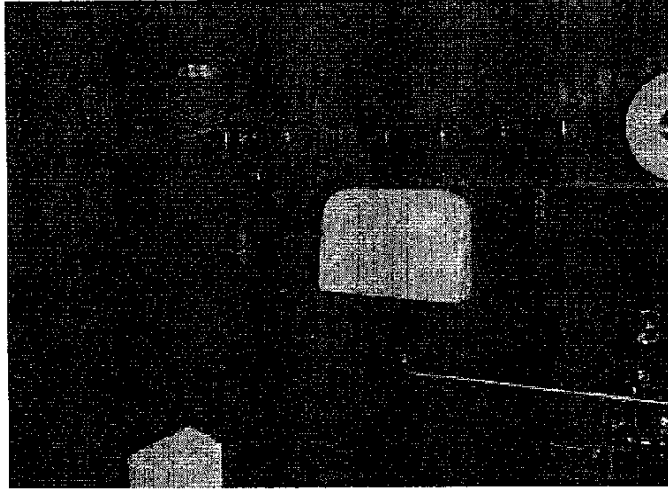
16.



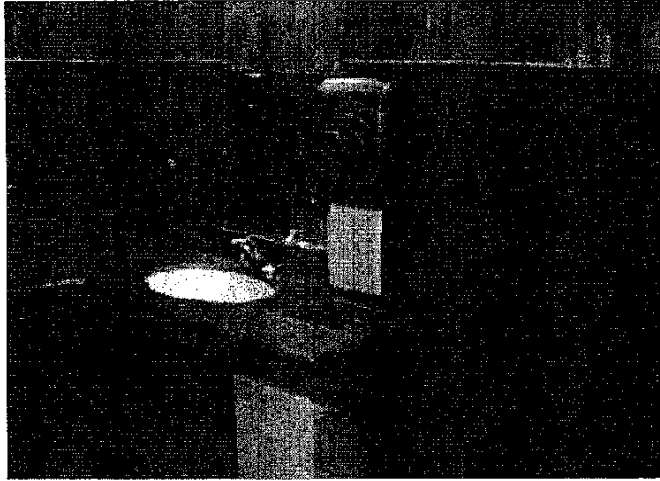
17.



18.



19.



20.

