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17 UNITED STATES DISTRICT COURT  
18 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

19 LISA MARIE IRVING, AMY BONANO )  
and THE NATIONAL FEDERATION )  
20 OF THE BLIND, INC., )

21 Plaintiffs,

22 v.

23 NANCY A. BERRYHILL, Acting )  
24 Commissioner of the Social Security )  
Administration, in her official capacity, )

25 Defendants. )  
26 )  
27 )  
28 )

Case No.: **17-6730**  
COMPLAINT FOR  
DECLARATORY AND  
INJUNCTIVE RELIEF

1 Plaintiffs, Lisa Marie Irving, Amy Bonano, and the National Federation of  
2 the Blind, Inc. (“NFB”), by and through undersigned counsel, file their Complaint  
3 for Declaratory and Injunctive Relief and respectfully allege as follows:

4 **I. INTRODUCTION**

5 1. This action seeks to end systemic violations by the Social Security  
6 Administration (“SSA”) of the civil rights of all blind individuals who visit or  
7 wish to visit SSA offices by failing to provide blind individuals an equal  
8 opportunity to access to SSA’s touchscreen check-in kiosks, as required by  
9 Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794 (“Section 504”).

10 2. For semantic convenience throughout this complaint, the term “blind”  
11 is used in its broadest sense to include all persons who, under federal civil rights  
12 laws including Section 504, have a vision-related disability that requires  
13 alternative methods to access hard-copy standard print.

14 3. In 2015, SSA delivered benefits from its programs to about 65 million  
15 individuals, including approximately 60 million who received Old Age, Survivor  
16 and Disability Insurance, among them more than a million blind individuals.  
17 Approximately 830,000 blind individuals received Supplemental Security Income  
18 (“SSI”) benefits from SSA in 2015. Many of these blind recipients of SSA  
19 benefits visit SSA field offices with questions and requests for assistance, as well  
20 as to obtain other services related to their benefits.

21 4. SSA requires visitors to its offices throughout the country to check in  
22 for their visits using touchscreen Visitor Intake Processing kiosks (“VIPr kiosks”).  
23 Although SSA affords sighted individuals the opportunity to use the VIPr kiosks  
24 independently, thus maintaining the privacy of their requested personal  
25 information, it fails to offer blind individuals this same independent access. This  
26 lack of equal opportunity requires blind individuals to compromise their privacy  
27 by forcing them to rely on the availability of sighted third parties for assistance.

28 5. Section 504 and federal regulations require SSA to communicate

1 effectively with individuals with disabilities who visit their offices. SSA must  
2 provide auxiliary aids and services and make the modifications necessary to  
3 ensure that blind persons have an equal opportunity to participate in and enjoy the  
4 benefits of its programs. SSA must, but does not, provide accessible VIPr kiosks  
5 at all of its offices to ensure that blind individuals have an equal opportunity to  
6 participate in and enjoy the benefits of SSA's programs and activities. More than  
7 four decades after the enactment of the Rehabilitation Act, however, SSA has  
8 failed to ensure that blind individuals have an equal opportunity to check into and  
9 access the information, assistance, and other critical services it provides through  
10 its field offices. Such conduct prevents blind visitors to SSA offices from  
11 participating in and benefitting equally from SSA programs in violation of Section  
12 504.

13 **II. JURISDICTION AND VENUE**

14 6. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§  
15 1331, 1343, and 1361. Plaintiffs seek a declaration of rights pursuant to the  
16 Declaratory Judgment Act, 28 U.S.C. §§ 2201-02.

17 7. Venue over Plaintiffs' claims is proper in the Southern District of  
18 California because Plaintiff Lisa Marie Irving resides within this District, pursuant  
19 to 28 U.S.C. § 1391(b), a substantial part of the events, acts, and omissions giving  
20 rise to Plaintiffs' claims occurred in this District, and because Defendant  
21 maintains several offices and operates in this District.

22 **III. PARTIES**

23 8. Plaintiff Lisa Marie Irving is blind and a recipient of SSA benefits.  
24 She is thus a qualified individual with a disability within the scope of Section 504.  
25 Ms. Irving resides in La Mesa, California and is a member of the NFB.

26 9. Plaintiff Amy Bonano is blind and a recipient of SSA benefits. She is  
27 thus a qualified individual with a disability within the scope of Section 504. Ms.  
28 Bonano resides in Dayton, Ohio and is a member of the NFB.

1           10.    The NFB, the oldest and largest national organization of blind  
2 persons, is a non-profit corporation duly organized under the laws of California  
3 with its principal place of business in Baltimore, Maryland. It has affiliates in all  
4 50 states, Washington, D.C., and Puerto Rico. The vast majority of its  
5 approximately 50,000 members are blind persons who are recognized as a  
6 protected class under California and federal laws. The NFB is widely recognized  
7 by the public, Congress, executive agencies of government, and the courts as a  
8 collective and representative voice on behalf of blind Americans and their  
9 families. The purpose of the NFB is to promote the general welfare of the blind  
10 by (1) assisting the blind in their efforts to integrate themselves into society on  
11 terms of equality and (2) removing barriers and changing social attitudes,  
12 stereotypes and mistaken beliefs that sighted and blind persons hold concerning  
13 the limitations created by blindness and that result in the denial of opportunity to  
14 blind persons in virtually every sphere of life.

15           11.    The NFB and many of its members have long been actively involved  
16 in promoting equal access to important information regarding government benefits  
17 and accessible technology for the blind, so that blind persons can live and work  
18 independently in today's technology-dependent world. NFB members reside  
19 throughout the United States, including California. Plaintiffs Lisa Marie Irving  
20 and Amy Bonano, as well as Brian Saucer, are among the NFB members who  
21 cannot independently access SSA's VIPr kiosks.

22           12.    Defendant Nancy A. Berryhill is the Acting Commissioner of SSA, a  
23 federal agency. Acting Commissioner Berryhill is sued in her official capacity as  
24 the official charged with performing the statutory and regulatory duties of SSA  
25 and with supervising the SSA and its divisions, agents, employees and  
26 representatives. All divisions, agents, contractors, employees and representatives  
27 of SSA were acting within the scope of their agency or employment while making  
28 any of the statements and committing any of the acts alleged herein.

1 **IV. STATEMENT OF FACTS**

2 13. The Social Security Administration uses touchscreen check-in kiosks,  
3 or Visitor Intake Processing (or “VIPr kiosks”), at its field offices throughout the  
4 country. Visitors to SSA offices must use the kiosks to register their arrival and  
5 check in for their appointments. The VIPr kiosks ask visitors for a host of  
6 personal information, including the visitor’s Social Security number. After the  
7 check-in process is complete, the kiosk issues the visitor a paper ticket with a  
8 printed number. The visitor then waits for the number to be called before meeting  
9 with an SSA employee.

10 14. Touchscreen kiosks can easily be made accessible for the blind by  
11 installing an audio component into the device that announces all menus and menu  
12 options, installing a tactile keypad to input information, and installing a  
13 headphone jack for privacy and ease of comprehension for the user. Similar  
14 touchscreen technologies have already been made accessible for non-visual use in  
15 this manner.

16 15. Nevertheless, although sighted individuals can independently use the  
17 VIPr kiosks to check-in, blind individuals have been denied this opportunity.  
18 SSA’s VIPr kiosks either do not have the features required for non-visual  
19 accessibility, the features frequently malfunction, and/or the kiosks’ accessibility  
20 features are not properly configured.

21 16. Blind visitors to SSA offices throughout the country have encountered  
22 VIPr kiosks that they cannot independently access: there are either no Braille or  
23 audio instructions on how to non-visually operate the kiosk, or the Braille  
24 instructions are difficult to locate or read; the information on the kiosk screen is  
25 either not conveyed audibly at all, done so at a volume too low to understand, or,  
26 on the rare occasion that the audio output works properly, there is no headphone  
27 jack available to allow users to listen privately to the personal information being  
28 announced; there is either no tactile keypad attached or the keypad is not attached

1 properly; and the printed paper ticket is inaccessible.

2 17. Blind individuals are forced to rely on sighted security guards,  
3 members of the public, or companions to help them check in, and must divulge  
4 private information such as their Social Security numbers, often in a crowded and  
5 public space.

6 18. Blind visitors' ability to check in is also delayed, as SSA staff  
7 members are often preoccupied and cannot assist immediately.

8 19. The NFB alerted SSA to this problem by letter in October 2015. At a  
9 meeting between SSA and NFB in November 2015, SSA assured NFB it was  
10 remedying the access barriers identified in NFB's letter and that blind individuals  
11 would be able to fully and independently operate the kiosks at their local field  
12 offices.

13 20. In January and February of 2016, however, NFB members, including  
14 Plaintiffs, encountered many of the same access barriers they had experienced  
15 before, both at field offices they had previously visited and at newly visited  
16 offices. In April 2016, NFB again informed SSA that the VIPr kiosks remained  
17 inaccessible. Yet as recently as May 2017, NFB members, including Plaintiffs,  
18 continue to encounter inaccessible VIPr kiosks.

19 **V. LISA MARIE IRVING**

20 21. Lisa Marie Irving is a blind recipient of SSA benefits.

21 22. On or about January 8, 2016, Ms. Irving visited her local SSA field  
22 office located at 7961 University Avenue, La Mesa, California 91942. Because a  
23 security guard had previously directed her to the VIPr kiosk at this office, she  
24 knew where to find the kiosk during this visit.

25 23. Although the kiosk had Braille instructions attached to its side, the  
26 security guard rushed Ms. Irving along before she could read the instructions. Ms.  
27 Irving was unable to determine if and where a headphone jack was located on the  
28 kiosk, and the security guard offered no assistance.

1           24. Unlike during a previous visit to the office, when Ms. Irving had  
2 encountered the kiosk without a keypad, the kiosk had an attached keypad during  
3 this visit. Yet when Ms. Irving attempted to orient herself to the keypad and use it  
4 to enter her Social Security number, she discovered that it was upside-down.

5           25. At this point, the security guard grew so exasperated with Ms. Irving  
6 that he tore off another visitor's unused ticket and gave that to Ms. Irving,  
7 ordering her to use it and ignoring her request to use the kiosk independently, just  
8 as all other visitors were able to do.

9           26. In or about October 2016, Ms. Irving returned to her local SSA field  
10 office. When attempting to use the kiosk, the security guard and a supervisor  
11 informed her that the kiosk was not working. The keypad was not connected to the  
12 kiosk and the audio feature did not seem to be activated. When Ms. Irving asked  
13 why these accessibility features had not been fixed, the supervisor told her that no  
14 one really used them. The Braille instructions attached to the side of the kiosk  
15 were nearly impossible to read. The Braille was smashed in and the location of  
16 the kiosk, right next to the metal detector by the entrance, did not allow Ms. Irving  
17 the time or space to read the instructions. Given the kiosk's location, Ms. Irving  
18 had to twist her hand and wrist at an awkward angle just to attempt to read the  
19 Braille instructions.

20           27. On May 4, 2017, Ms. Irving again returned to the La Mesa SSA office  
21 to obtain a current Social Security Disability Income statement.

22           28. In attempting to check in, Ms. Irving found that the Braille  
23 instructions were still located on the side of the kiosk in an awkward position,  
24 making them impossible to read. She could not locate any keypad connected to  
25 the kiosk, and there were no audio instructions or audio output.

26           29. Ms. Irving's experiences still generate feelings of anxiety and dread.  
27 Ms. Irving would like to use the VIPr kiosks to check in independently, just like  
28 visitors without disabilities. She regularly uses her iPad, an accessible

1 touchscreen device, independently and believes that if the VIPr kiosks were better  
2 designed for nonvisual access, she would have no difficult using these devices  
3 independently as well

4 **VI. AMY BONANO**

5 30. Amy Bonano is a blind recipient of SSA benefits.

6 31. Ms. Bonano visited her local SSA field office located at 200 West  
7 Second Street, Room 209, Federal Building, Dayton, Ohio 45402, on or about  
8 February 24, 2017 to report her wages and deliver her paystubs.

9 32. Ms. Bonano required assistance to use the VIPr kiosk, as the kiosk  
10 had no Braille or audio instructions, no headphone jack, and no keypad. Ms.  
11 Bonano had to ask the security guard to enter her information for her on the kiosk.

12 33. SSA staff, including the security guard, did not know of any  
13 accessible kiosks at that office. In fact, when Ms. Bonano told an SSA employee  
14 that there should be an accessible kiosk installed there, the employee responded  
15 that it was a good idea.

16 34. Because Ms. Bonano could not access the number on her printed  
17 ticket, she relied on the security guard to tell her what her number was. Ms.  
18 Bonano eventually realized the security guard had read her the incorrect check-in  
19 number. She had to ask other visitors to read her ticket for her.

20 35. Ms. Bonano visits her local SSA office several times a year and wants  
21 to be able to check in independently, just like other visitors do.

22 36. Ms. Bonano feels very uncomfortable giving out her private  
23 information to a stranger in a public place and now dreads going to her local SSA  
24 office. She continues to visit the office, however, to submit her paystubs.

25 37. Ms. Bonano is capable of using touchscreen devices when they are  
26 designed accessibly. She regularly uses accessible touchscreen devices, such as  
27 an iPhone and iPad, with a Bluetooth headset. She also regularly uses accessible  
28 ATMs independently.



1           38. Ms. Bonano does not understand why an accessible VIPr kiosk has  
2 not been installed at her local SSA office when the software for such touchscreen  
3 technology exists today.

4 **VII. THE NATIONAL FEDERATION OF THE BLIND, INC.**

5           39. The National Federation of the Blind has been and continues to be  
6 harmed by SSA's discriminatory actions, as set forth herein, in two ways.

7           40. First, because the ultimate purpose of the National Federation of the  
8 Blind is the complete integration of the blind into society on a basis of equality,  
9 SSA's discriminatory treatment of blind visitors to its offices frustrates the NFB's  
10 organizational mission. The NFB's objective includes the removal of legal,  
11 economic, and social discrimination. As part of its mission and to achieve these  
12 goals, the NFB has worked actively to ensure that the blind have an equal  
13 opportunity to access government programs and services by collaborating with  
14 federal agencies, such as the United States Department of Education, to ensure  
15 accessibility for the blind. The NFB has devoted extensive resources - resources  
16 that have been diverted from other important projects - to assisting federal and  
17 state government agencies, along with countless private entities, with identifying  
18 and correcting methods of communication (including touchscreen kiosks) that are  
19 inaccessible to the blind. Indeed, before filing this lawsuit, the NFB devoted  
20 resources to making several unsuccessful overtures to SSA to work  
21 collaboratively to remedy the problems outlined in this complaint.

22           41. Second, the NFB is a membership organization and has many blind  
23 members, including Ms. Irving and Ms. Bonano, as well as Brian Saucer, who  
24 now receive or may be interested in receiving SSA benefits and services and who  
25 wish to access SSA VIPr kiosks independently. SSA's discriminatory conduct  
26 harms many NFB members who are similarly situated.

27           42. For example, Brian Saucer is a blind NFB member who resides in  
28 Cedar Rapids, Iowa and receives SSA benefits. Mr. Saucer first encountered the

1 VIPr kiosk when he visited his local SSA field office located at 3165 Williams  
2 Boulevard SW, Cedar Rapids, Iowa 52404 on or about January 20, 2015. The  
3 security guard told him that he would need to register via the VIPr kiosk and  
4 helped Mr. Saucer locate the kiosk but did not assist him with orientation or use of  
5 the kiosk.

6 43. The kiosk was completely inaccessible. It had no audio component  
7 and no Braille or audio instructions.

8 44. Mr. Saucer's sighted friend, who had accompanied him, had to assist  
9 him to check in. Mr. Saucer was forced to disclose his Social Security number to  
10 his friend to enter into the kiosk.

11 45. Mr. Saucer complained to the security guard and staff at the check-in  
12 window about the accessibility barriers. The staff appeared to already know about  
13 them and did not seem to care.

14 46. Mr. Saucer returned to his SSA office in or about February of 2016.  
15 He was once again unable to use the kiosk independently.

16 47. This time, the kiosk had the audio component activated, but the  
17 volume was too low for comprehension, even with the volume knob turned all the  
18 way up. There was a keypad attached, but no tactile markings on the keys. Mr.  
19 Saucer could not locate any Braille instructions and could not hear the audio well  
20 enough to determine if the instructions were provided via audio.

21 48. The staff was once again unhelpful. Mr. Saucer again had to disclose  
22 his Social Security number to his sighted friend, on whom he relied to enter his  
23 information into the kiosk for him.

24 49. Mr. Saucer most recently returned to his local SSA office in or about  
25 December of 2016. Once again, the kiosk had no Braille or audio instructions,  
26 and Mr. Saucer could not figure out how to use it. The attached keypad had some  
27 tactile markings, but they were too light to determine which key was which.

28 50. The security guard instructed Mr. Saucer to push a button on the kiosk

1 for audio. Although the audio output was loud enough to hear on this visit, it also  
2 afforded Mr. Saucer no privacy. Mr. Saucer asked the security guard if there were  
3 headphones he could use to maintain his privacy, but the security told him there  
4 were none. Rather than disclose his personal information to everyone waiting in  
5 the office, Mr. Saucer chose to limit the disclosure of his Social Security number  
6 to his sighted friend, who once again had to interact with the kiosk on Mr.  
7 Saucer's behalf.

8 51. When kiosks are designed accessibly, Mr. Saucer has no difficulty  
9 using them. For example, he regularly uses accessible ATMs independently. He  
10 would like to be able to use the VIPr kiosks independently as well. His  
11 experiences with the inaccessible kiosk at his SSA field office, and, in particular,  
12 his reliance on sighted assistance to use the kiosk, have left him feeling child-like  
13 and unintelligent. Mr. Saucer does not wish to return to his SSA field office until  
14 he can use the kiosk independently.

15 52. The NFB has many other blind members across the country who wish  
16 to use the VIPr kiosks independently, but have been unable to do so.

## 17 **VIII. VIOLATION OF SECTION 504 OF THE REHABILITATION**

### 18 **ACT OF 1973**

19 53. The foregoing paragraphs are each re-alleged and incorporated as if  
20 fully set forth herein.

21 54. Section 504 of the Rehabilitation Act of 1973 (as amended) ("Section  
22 504") provides that:

23 No otherwise qualified individual with a disability in the United  
24 States . . . shall, solely by reason of his or her disability, be  
25 excluded from the participation in, be denied the benefits of, or be  
26 subjected to discrimination under any program or activity receiving  
27 Federal financial assistance or activity conducted by any Executive  
agency[.]”

28 29 U.S.C. § 794 (as amended).

1           55. Ms. Irving, Ms. Bonano, and other NFB members are “individual[s]  
2 with a disability” as defined in 29 U.S.C. § 705(20) because each has a visual  
3 impairment that substantially limits one or more of his or her major life activities,  
4 including the major life activity of seeing.

5           56. As a result of being “individual[s] with a disability” as defined in 29  
6 U.S.C. § 705(20), Plaintiffs and other NFB members are entitled to modifications  
7 and auxiliary aids and services that provide them an equal opportunity to access  
8 SSA’s programs.

9           57. As a program or activity of the Department of Health and Human  
10 Services, an executive agency, SSA must comply with Section 504.

11           58. SSA is bound by regulations the Department of Health and Human  
12 Services has promulgated under Section 504 of the Rehabilitation Act, 45 C.F.R.  
13 Part 85.

14           59. These regulations require SSA to provide Plaintiffs with “auxiliary  
15 aids,” which are “services or devices that enable persons with impaired sensory,  
16 manual, or speaking skills to have an equal opportunity to participate in, and enjoy  
17 the benefits of, programs or activities” that SSA conducts. 45 C.F.R. § 85.3. As  
18 defined by the regulations, auxiliary aids that are “useful for persons with  
19 impaired vision include readers, Brailled materials, audio recordings, and other  
20 similar services and devices.” *Id.* The regulations also require SSA to “take  
21 appropriate steps to ensure effective communication” and “furnish appropriate  
22 auxiliary aids where necessary to afford an individual with handicaps an equal  
23 opportunity” to participate in its programs. 45 C.F.R. § 85.51. In addition, SSA  
24 must “give primary consideration to the requests of the individual with handicaps”  
25 in determining the type of auxiliary aid it must provide. *Id.*

26           60. These regulations also state that “in providing any aid, benefit, or  
27 service,” SSA may not “through contractual, licensing, or other arrangements”  
28 deny individuals with disabilities “the opportunity to participate in or benefit

1 from” SSA’s aids, benefits, or services or afford individuals with disabilities an  
2 opportunity to participate that “is not equal to that afforded others” or “not as  
3 effective in affording equal opportunity.” 45 C.F.R. § 85.21. Furthermore, the  
4 regulations prohibit SSA from “directly or through contractual or other  
5 arrangements” using “methods of administration” that discriminate against  
6 individuals with disabilities or “[d]efeate or substantially impair accomplishment of  
7 the objectives of a program or activity with respect to individuals with handicaps.”  
8 45 C.F.R. § 85.21(b)(3)(ii).

9 61. As alleged herein, SSA has and continues to discriminate unlawfully  
10 against Plaintiffs and other members of the NFB by failing to provide fully  
11 accessible VIPr touchscreen kiosks, which are integral to individuals’ ability to  
12 access SSA field offices and thus participate in and benefit from SSA’s programs.  
13 By refusing to provide accessible kiosks (such as by failing to ensure that the  
14 audio component is activated, tactile keypads are connected, a headphone jack is  
15 installed, and Braille and audio instructions are available for orientation to the  
16 kiosks), SSA has created and continues to create a significant and unnecessary  
17 obstacle to Plaintiffs’ and other NFB members’ participation in SSA’s programs  
18 and activities.

19 62. Without the opportunity to use the VIPr kiosks independently,  
20 Plaintiffs and other NFB members cannot access the information, assistance, and  
21 other services available at SSA field offices in a manner equal to that of sighted  
22 persons. To check in at SSA offices, they are forced to choose the only poor  
23 option available: relying on sighted assistance from third parties, which requires  
24 them to sacrifice their privacy, as they must disclose highly sensitive information -  
25 including their Social Security numbers-and put themselves at risk of identity  
26 theft.

27 63. Because of the greater hurdles Plaintiffs and other NFB members face  
28 when attempting to check in at SSA offices, they are at a greater risk of invasion

1 of their privacy and deterrence from obtaining the life-sustaining benefits that  
2 SSA provides.

3 64. Providing accessible kiosks and ensuring notice of their availability  
4 would not fundamentally alter SSA's programs or create an undue administrative  
5 or cost burden. Large commercial entities already provide accessible kiosks to  
6 blind persons in contexts that require the secure maintenance and transfer of  
7 confidential information.

8 65. SSA's conduct constitutes an ongoing and continuous violation of the  
9 law. Unless restrained from doing so, SSA will continue to so violate the law.  
10 SSA's conduct has caused and will continue to cause Plaintiffs immediate and  
11 irreparable injury. Plaintiffs have no adequate remedy at law for the injuries they  
12 suffer and will continue to suffer. Thus, Plaintiffs are entitled to injunctive relief.

13 WHEREFORE, Plaintiffs request relief as set forth below.

14 **IX. PRAYER FOR RELIEF**

15 WHEREFORE, Plaintiffs respectfully pray that this Court:

- 16 1. Declare that Defendant's failure to ensure that SSA offers and  
17 provides accessible VIPr kiosks to blind individuals who visit or wish  
18 to visit SSA offices violates Section 504 of the Rehabilitation Act of  
19 1973;
- 20 2. Declare that Defendant has a duty to provide full and equal access to  
21 all of SSA's kiosks in appropriately secure environments;
- 22 3. Grant a permanent injunction, requiring Defendant, her successors in  
23 office, agents, assigns, representatives, employees, and all persons  
24 acting in concert therewith, to:
  - 25 a. provide full and equal access to all of SSA's kiosks in  
26 appropriately secure environments that allow blind individuals  
27 using screen access software to check in to SSA offices entirely  
28 independently;

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- b. develop policies and procedures for ensuring that all VIPr kiosks have features required for nonvisual accessibility and that such features are operational at all SSA offices; that SSA staff and/or contractors understand how to maintain and operate the VIPr kiosks for nonvisual access, as well as their obligation to alert blind individuals to the presence and accessibility of the kiosks; and that VIPr kiosks are designed in a manner that provides blind visitors with equally effective and independent access to the office’s check-in process; and
  - c. develop policies and procedures, such as Section 504 compliance monitoring, for ensuring that all remediated SSA kiosks remain accessible and that all new SSA kiosks are accessible;
4. Award Plaintiffs’ reasonable attorneys’ fees and costs, as provided by law; and Order such other and further relief as the Court deems just and proper.

Dated: August 28, 2017

Respectfully submitted,  
DISABILITY RIGHTS CALIFORNIA

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