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PLEASE VERIFY BEFORE SENDING

Unverified AI draft. Every fact must be checked against the records before use. It is not legal advice. Fill in every [ADD: …] placeholder, set the demand amount, confirm anything marked [VERIFY], and delete this box before sending.

- Check Nevada's required form and notice period before sending.
- [VERIFY: Nevada disability access law]. The Legal basis section names only the federal ADA in general terms and cites no statute or standard.
- Recipient names, mailing addresses, ZIP codes and delivery method for Silver Mesa Family Pharmacy LLC and Juniper Plaza Holdings LLC are not in the sources. The only address given is the store's street address. Confirm the exact entity names and the proper recipients.
- Parking conflict: the client says the space had a "wheelchair sign" [client_visit_log.pdf p.1]. The inspector found a symbol painted on the ground and no posted sign [access_consultant_report.pdf p.1]. The letter follows the inspection report.
- The curb ramp slope, the restroom interior conditions, the door hardware and the signature pad height come from the inspector's report only. The client did not describe them himself. The letter attributes them to the inspection, and the curb ramp effect is left as a placeholder. Confirm with the client.
- Display: the manager said on February 12 that the display would be moved [complaint_email_and_reply.pdf p.1]. The inspector still found it on February 20 [access_consultant_report.pdf p.1]. The client's own note says it was back at the head of aisle 3 on February 27 [complaint_email_and_reply.pdf p.1]. Confirm the timeline with the client, and whether any photos exist of the February 27 condition.
- Responsibility between tenant and landlord rests only on the store manager's statement that the landlord handles the parking lot and entrance [complaint_email_and_reply.pdf p.1]. The lease was not provided. Check which party controls which items.
- The inspector's opinion says the conditions do not meet current standards "for new or altered facilities," while the manager says the building is older [access_consultant_report.pdf p.1; complaint_email_and_reply.pdf p.1]. The letter cites no standard. Confirm which standard applies before sending.
- Per the firm notes, the letter makes no money demand and has no [ADD: demand amount] placeholder. Confirm this. The response deadline is a placeholder.
- Decide whether to enclose the inspection report and date-stamped photos 1 through 14. The letter says only that they exist.

Ocampo Reyes Law Group
[ADD: firm street address]

[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

[ADD: recipient name]
Silver Mesa Family Pharmacy LLC
[ADD: mailing address]
[ADD: city, state ZIP]

Re: Accessibility barriers at Silver Mesa Family Pharmacy, 1480 Cottonwood Bend Road, Juniper Wells, Nevada. Our client: Desmond Okafor. Dates of visits: January 14, 2026 and February 9, 2026

Dear [ADD: recipient name]:

Introduction

We represent Desmond Okafor [firm notes]. Mr. Okafor uses a manual wheelchair and drives a van with a side ramp. Silver Mesa Family Pharmacy, 1480 Cottonwood Bend Road, Juniper Wells, Nevada, is the closest pharmacy to his home and fills his monthly prescriptions [client_visit_log.pdf p.1].

Mr. Okafor visited the pharmacy on January 14, 2026 and February 9, 2026 and bought items on both dates [client_visit_log.pdf p.1]. He wants to keep using this pharmacy and would return if the problems described below were fixed [client_visit_log.pdf p.1]. We are writing to ask that you remove these barriers and give us a written plan for doing so. We are sending a copy of this letter to the property owner, Juniper Plaza Holdings LLC.

Barriers encountered

On February 20, 2026, a certified access specialist from High Desert Access Consulting inspected the premises at our request. She took measurements with a calibrated tape measure, digital level and door pressure gauge and took date-stamped photographs [access_consultant_report.pdf p.1]. Mr. Okafor's own accounts of his visits are cited separately below. The barriers are:

- **Accessible parking.** The lot has 38 spaces. One has a wheelchair symbol painted on the ground, with no posted sign and no adjacent access aisle. The next space is directly beside it, the space measured 98 inches wide, and there is no van-accessible space [access_consultant_report.pdf p.1, Photos 1-3]. On January 14, 2026, a car was parked beside the space and Mr. Okafor could not lower his ramp. He parked across two spaces at the far end of the lot. He reports the same parking problem on February 9, 2026 [client_visit_log.pdf p.1].

- **Route to the entrance.** The curb ramp slope measured 11.8 percent at its steepest point [access_consultant_report.pdf p.1, Photo 4].
- **Entrance door.** The raised threshold measured 1 1/4 inches high with a square edge. The door opening force measured 14 pounds. The hardware is a round knob-style pull [access_consultant_report.pdf p.1, Photos 5-7]. On January 14, 2026, Mr. Okafor's front casters caught on the threshold and he nearly tipped forward. A customer held the door because he could not pull it open while holding his chair [client_visit_log.pdf p.1].
- **Interior aisle.** A freestanding display at the head of aisle 3 left a clear width of 27 inches [access_consultant_report.pdf p.1, Photos 8-9]. On January 14, 2026, a display of seasonal items blocked the main aisle [client_visit_log.pdf p.1]. Mr. Okafor reports that on February 27, 2026, the display had been moved back to the head of aisle 3 and nothing else had changed [complaint_email_and_reply.pdf p.1].
- **Pharmacy counter.** The counter measured 43 1/2 inches high for its full length, with no lowered section. The signature pad is mounted at 46 inches [access_consultant_report.pdf p.1, Photos 10-11].
- **Restroom.** The door clear opening measured 27 1/2 inches. A storage cabinet blocks the interior turning space. There is one grab bar on the side wall and none on the rear wall. The pipes under the lavatory are exposed [access_consultant_report.pdf p.1, Photos 12-14]. On February 9, 2026, Mr. Okafor could not enter the restroom because the door was too narrow for his chair [client_visit_log.pdf p.1].

On February 10, 2026, Mr. Okafor emailed the store about these problems and asked whether it planned to fix them [complaint_email_and_reply.pdf p.1]. The store manager, Gina Thornquist, replied on February 12, 2026. She said the landlord handles the parking lot and entrance and that the store would move the display. She said staff would come around the counter to help, and that the store had no plans for the restroom at that time [complaint_email_and_reply.pdf p.1].

Effect on our client

- **Parking.** Mr. Okafor could not lower his van ramp next to the accessible space and had to park across two spaces at the far end of the lot [client_visit_log.pdf p.1].
- **Entrance.** He nearly tipped forward when his casters caught on the threshold. He could not open the door himself while holding his chair [client_visit_log.pdf p.1].
- **Aisle.** He could not reach the pain relief shelf [client_visit_log.pdf p.1].
- **Counter.** He could not see over the pickup counter or sign the screen, and the pharmacist had to come around the counter [client_visit_log.pdf p.1].
- **Restroom.** He could not use the restroom and had to leave and go home early on February 9, 2026 [client_visit_log.pdf p.1].
- **Curb ramp.** [ADD: how the curb ramp slope affected the client, if at all]

Legal basis

The federal Americans with Disabilities Act may apply to the pharmacy as a business open to the public, and may also apply to the owner of the property where it operates. [VERIFY: Nevada disability access law]. We raise these matters in general terms and reserve all of our client's rights.

Requested remediation

We ask that Silver Mesa Family Pharmacy LLC, and Juniper Plaza Holdings LLC to the extent a condition is within its control, take the following steps by [ADD: response deadline]:

- Correct the parking conditions identified in the inspection: no posted sign, no adjacent access aisle, a 98-inch-wide space, and no van-accessible space.
- Correct the curb ramp on the route to the entrance, which measured 11.8 percent at its steepest point.
- Correct the raised 1 1/4-inch threshold, the 14-pound door opening force and the knob-style door hardware at the entrance.
- Clear the 27-inch aisle at the head of aisle 3 and keep the aisles clear on a continuing basis.
- Provide a section of the pharmacy counter and a signature pad that a person using a wheelchair can use.
- Correct the restroom conditions identified in the inspection: the 27 1/2-inch door opening, the blocked turning space, the missing rear grab bar and the exposed lavatory pipes.
- Send us a written remediation plan with a timeline for each item, stating which party is responsible for each.
- Name a contact person for this matter.

In the inspector's opinion, the parking, entrance and display items can be corrected quickly and at low cost. The counter and restroom items need minor alterations [access_consultant_report.pdf p.1]. Mr. Okafor is not seeking money in this letter. He wants the barriers fixed and a written plan [firm notes].

We would welcome a call to discuss the plan and a reasonable schedule. Please contact me at [ADD: phone] or [ADD: email]. Mr. Okafor would prefer to resolve this without litigation.

Sincerely,

Teresa Ocampo
Ocampo Reyes Law Group

cc: Juniper Plaza Holdings LLC, [ADD: recipient name and mailing address]