

DRAFT — FOR ATTORNEY REVIEW BEFORE SENDING (delete this line and all bracketed placeholders)

[Sender name]
[Address]
[City, State ZIP]
[Email] · [Phone]

[Date]

Dalton Investments LLC

[Registered agent / address — confirm]

**Re: Notice of Website Accessibility Barriers and Demand for Remediation —
daltoninvestments.com**

To whom it may concern:

This letter concerns barriers to accessibility on the website **daltoninvestments.com**, operated by Dalton Investments LLC in connection with an investment-advisory office. On the date(s) recorded below, the website was evaluated for conformance with the Web Content Accessibility Guidelines (WCAG) and found to contain the deficiencies described here.

1. How the website was evaluated

The evaluation followed the W3C Website Accessibility Conformance Evaluation Methodology (WCAG-EM 1.0), using three independent, industry-recognized testing engines (axe-core, HTML_CodeSniffer, and Google Lighthouse) run against the pages as actually rendered in a current web browser. 6 page(s) of the site were evaluated. All evidence was cryptographically sealed at the time of capture (SHA-256 hashing, a Merkle root per page, and a trusted timestamp), so that any later alteration is detectable and the findings are independently reproducible.

2. Deficiencies identified

The website does not conform to WCAG 2.1 Level AA, WCAG 2.2 Level AA, Section 508. The evaluation identified **27** distinct standards-mapped accessibility failures across **3** WCAG Success Criteria. These are barriers to people who use assistive technology — screen readers, keyboard-only navigation, or magnification. The principal failures:

WCAG Success Criterion	Instances	Severity	Example evidence file
WCAG 1.3.1 — Info and Relationships	1	serious	page_02_www_daltoninvestments_com_registration/elements/el_2.png
WCAG 4.1.2 — Name, Role, Value	8	serious	page_04_www_daltoninvestments_com_contact/elements/el_0.png
WCAG 1.4.3 — Contrast (Minimum)	18	serious	page_06_www_daltoninvestments_com_our_firm_history/elements/el_0.png

Automated evaluation detects only a portion of all accessibility requirements; the figures above are a floor, not a ceiling. The "example evidence file" is a preserved screenshot of the failing element within the sealed evidence set (Merkle root cd91fc184d5ad290f6cea6f1...).

3. Legal basis *[confirm with counsel]*

Title III of the Americans with Disabilities Act, 42 U.S.C. §§ 12181–12189, prohibits discrimination on the basis of disability in the full and equal enjoyment of the goods and services of a place of public accommodation. Courts apply WCAG (commonly WCAG 2.1 Level AA) as the practical measure of an accessible website, and recognize claims where the site has a nexus to the goods and services of the business. This matter is also governed by the Unruh Civil Rights Act, Cal. Civ. Code §§ 51–52.

Note: COVERAGE UNCERTAIN: whether an institutional investment adviser is a 'public accommodation' is contested; confirm with counsel before sending.

4. Demand

Within **45 days** of this letter, please: (a) remediate the deficiencies so that daltoninvestments.com conforms to WCAG 2.1 Level AA; (b) provide written confirmation of the remediation and the steps taken; and (c) adopt a policy and ongoing monitoring to maintain conformance. Because this matter may result in litigation, you are also asked to **preserve all electronically stored information** relating to the website, including source code, content-management records, and version history, as of the date of this letter.

5. Reservation of rights

Nothing in this letter waives any right or remedy, all of which are expressly reserved. The preserved evidence referenced above is available for independent verification. Please direct your response to the sender above by [response date].

Sincerely,

[Sender name]

This document is a template prepared with an automated evaluation tool. It is not legal advice. The recipient's legal name and address, the applicable causes of action, venue, and the sender's standing to assert a claim must be reviewed and confirmed by a licensed attorney before this letter is sent.