

Exhibit A — Evidence of Accessibility Barriers

Subject website: **daltoninvestments.com** · Pages evaluated: 6 · Captured (UTC) 2026-07-02/03 · Methodology: W3C WCAG-EM 1.0; engines axe-core, HTML_CodeSniffer, Lighthouse (cross-verified)

EVIDENCE SEAL. All captured artifacts (rendered DOM, accessibility tree, screenshots, engine output) were SHA-256 hashed and committed to a Merkle root: **cd91fc184d5ad290f6cea6f1c03360dd71acc0d3ac62ef63a41391b6bf4bdf9**, time-anchored via **rfc3161:freetsa.org**. Any alteration of any artifact breaks this seal and is detectable. Independent re-verification: **bun run src/verify.ts <manifest.json>**.

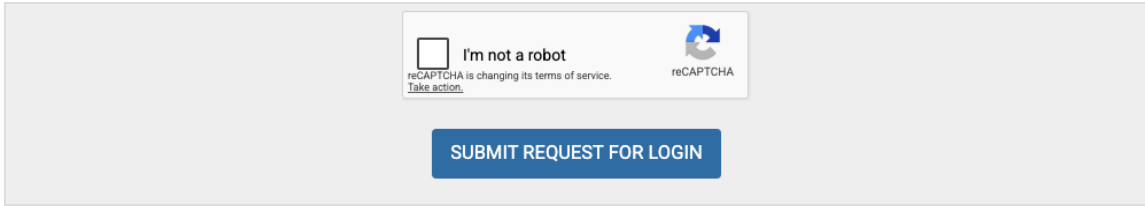
1. Itemized failures by WCAG Success Criterion

Success Criterion	Instances	Severity	Fails standard
WCAG 1.3.1 — Info and Relationships	1	serious	2.1 AA · 2.2 AA · 508
WCAG 4.1.2 — Name, Role, Value	8	serious	2.1 AA · 2.2 AA · 508
WCAG 1.4.3 — Contrast (Minimum)	18	serious	2.1 AA · 2.2 AA · 508

3 additional documented instances (and non-visual failures) are preserved in the sealed evidence set and omitted here for length; the complete itemization is available on request.

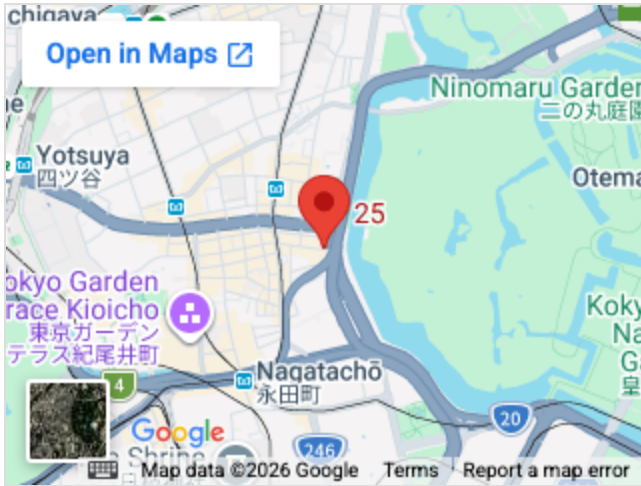
2. Documented barriers (preserved element screenshots)

Fig. 1. WCAG 1.3.1 Info and Relationships — **serious**
.swpm-section-26
Page: <https://www.daltoninvestments.com/registration/>



The screenshot shows a registration form with a reCAPTCHA challenge. The challenge consists of a checkbox labeled "I'm not a robot" and a reCAPTCHA logo. Below the checkbox, there is a message: "reCAPTCHA is changing its terms of service. Take action." To the right of the checkbox is a "SUBMIT REQUEST FOR LOGIN" button.

Fig. 2. WCAG 4.1.2 Name, Role, Value — **serious**
#location-block-1 > iframe
Page: <https://www.daltoninvestments.com/contact/>



The screenshot shows a Google Map of a location in Japan. A red pin is placed on the map, and a label "25" is next to it. The map shows various landmarks, including "Ninomaru Garden", "Yotsuya", "Tokyo Garden", "Nagatachō", and "Koky". The map is titled "Open in Maps" and includes a "Google" logo and "Map data ©2026 Google" text.

Fig. 3. WCAG 4.1.2 Name, Role, Value — **serious**

#location-block-2 > iframe

Page: <https://www.daltoninvestments.com/contact/>

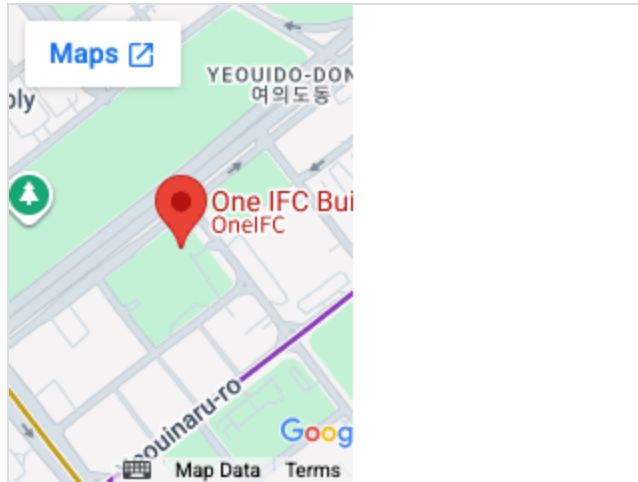


Fig. 4. WCAG 4.1.2 Name, Role, Value — **serious**

#location-block-3 > iframe

Page: <https://www.daltoninvestments.com/contact/>



Fig. 5. WCAG 4.1.2 Name, Role, Value — **serious**

#location-block-4 > iframe[loading="lazy"]

Page: <https://www.daltoninvestments.com/contact/>

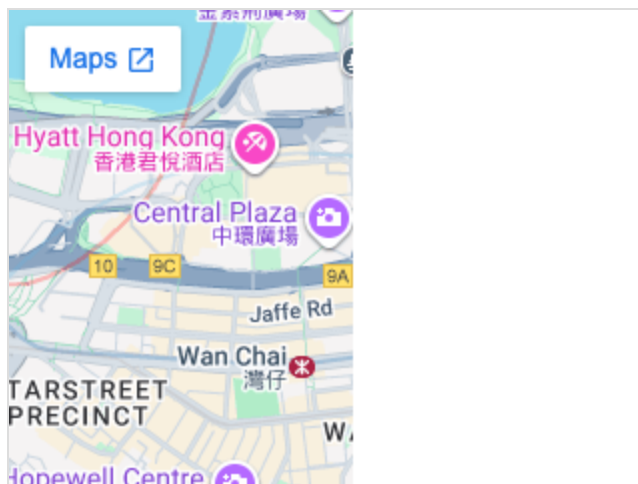


Fig. 6. WCAG 4.1.2 Name, Role, Value — **serious**

#location-block-5 > iframe[loading="lazy"]

Page: <https://www.daltoninvestments.com/contact/>

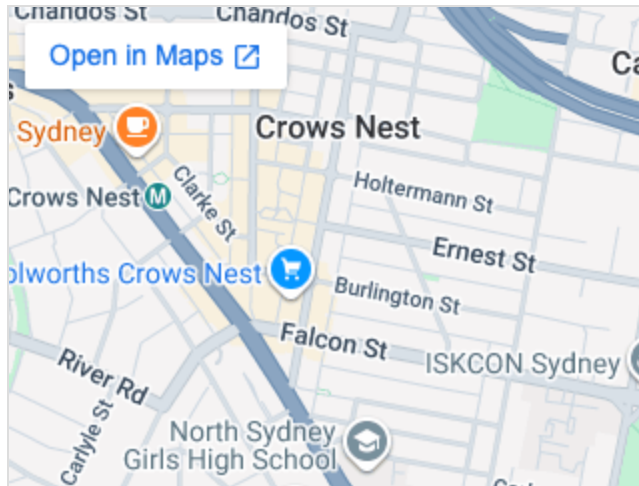


Fig. 7. WCAG 4.1.2 Name, Role, Value — **serious**

#location-block-6 > iframe[loading="lazy"]

Page: <https://www.daltoninvestments.com/contact/>

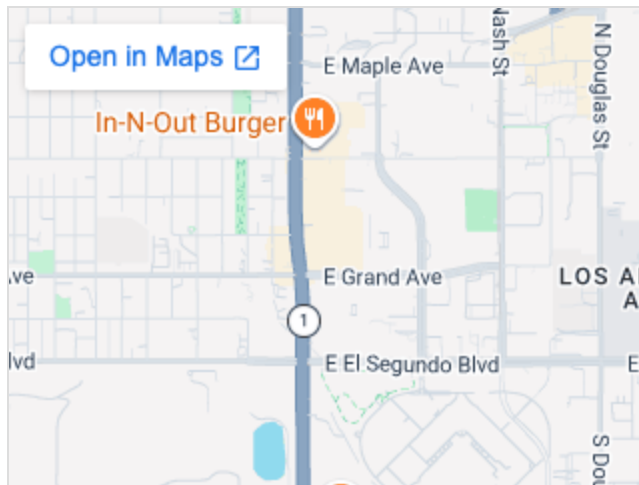


Fig. 8. WCAG 4.1.2 Name, Role, Value — **serious**

#location-block-7 > iframe[loading="lazy"]

Page: <https://www.daltoninvestments.com/contact/>

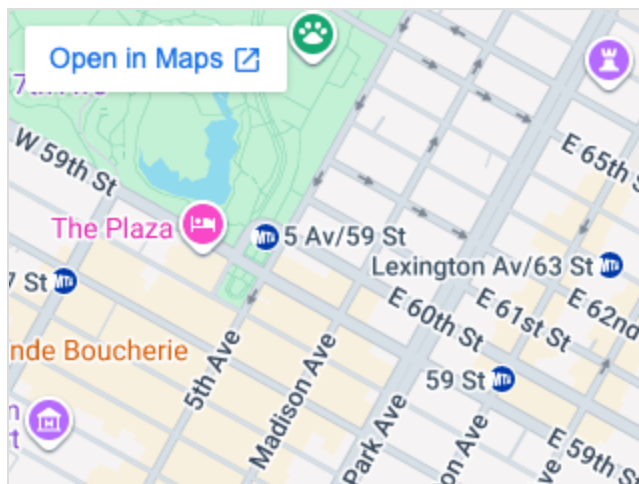


Fig. 9. WCAG 4.1.2 Name, Role, Value — **serious**

#location-block-8 > iframe[loading="lazy"]

Page: <https://www.daltoninvestments.com/contact/>

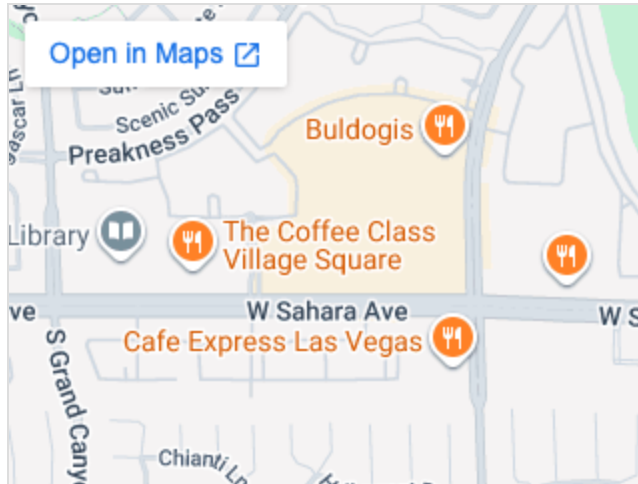


Fig. 10. WCAG 1.4.3 Contrast (Minimum) — **serious**

th:nth-child(1)

Page: <https://www.daltoninvestments.com/our-firm/history/>



Fig. 11. WCAG 1.4.3 Contrast (Minimum) — **serious**

th:nth-child(2)

Page: <https://www.daltoninvestments.com/our-firm/history/>



Fig. 12. WCAG 1.4.3 Contrast (Minimum) — **serious**

tr:nth-child(2) > td:nth-child(1)

Page: <https://www.daltoninvestments.com/our-firm/history/>



Fig. 13. WCAG 1.4.3 Contrast (Minimum) — **serious**

tr:nth-child(3) > td:nth-child(1)

Page: <https://www.daltoninvestments.com/our-firm/history/>



Fig. 14. WCAG 1.4.3 Contrast (Minimum) — **serious**

tr:nth-child(4) > td:nth-child(1)

Page: <https://www.daltoninvestments.com/our-firm/history/>



Fig. 15. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(5) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2001

Fig. 16. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(6) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2001

Fig. 17. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(7) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2013

Fig. 18. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(8) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2015

Fig. 19. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(9) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2015

Fig. 20. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(10) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2017

Fig. 21. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(11) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2019

Fig. 22. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(12) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2019

Fig. 23. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(13) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2019

Fig. 24. WCAG 1.4.3 Contrast (Minimum) — **serious**

`tr:nth-child(14) > td:nth-child(1)`

Page: <https://www.daltoninvestments.com/our-firm/history/>

2020

This appendix is attorney work product supporting the enclosed demand; it is not legal advice. Automated evaluation detects a portion of all accessibility requirements — these figures are a floor, not a ceiling.