

[REDACTED]  
11 September 2011

[REDACTED]  
[REDACTED]  
De [REDACTED],

I am a disabled person that has tried recently to navigate your website and have had many difficulties in doing so. Your website is not digitally compliant under the Department of Justice guidelines, the American Disabilities Act of 1990 and the California Civil Rights Unruh Act.

Your website has many violations. 1) Alternative text is missing for pictures that are displayed on your website. 2) Your website has very low contrast on your homepage that makes it difficult for people like me to navigate the site. 3) Many areas of your website are hard to navigate with the keyboard only. It is very hard for me to operate a mouse device while on the internet and have to rely on keyboard strokes. 4. Links and buttons become very confusing to me as they are not labeled and describe the purpose. This makes my experience on your website a trial and error hunt for the right navigation keystroke to get to the information I am looking for off your website. And finally, there is no statement of certification at the bottom of your website to demonstrate that the website is fully ADA digility compliant.

I very much intend to go back to your website and do business with you and your company. Once everything is fixed on your site. Please make the necessary corrections to comply with the Department of Justice 2010 updates for digital compliance.

This is a demand letter. This demand amount of \$16,000, was calculated on the minimum amount of obstructions and errors on your site. The Unruh act allows statutory damages of \$ 4,000 per occurrence. I had trouble with four items on your website. I simply multiplied four times \$4,000 to arrive at \$16,000.

(Violations of the Unruh Civil Rights Act, California Civil Code § 51 et seq. An award of statutory minimum damages of \$4,000 per violation pursuant to section 52(a) of the California Civil Code)

The government and the courts have made it quite clear that you are responsible for these violations and are obligated to fix them. The government has even given businesses tax credits and tax breaks to help these businesses follow the law and get up to speed with other businesses who are already practicing compliance. Keep in mind that all mobile websites, mobile apps and desktop websites must be digitally accessible to all. WCAG 2.1 AA is the standard that website owners are expected to uphold in today's courts.

Please take care of these issues as quickly as you can. If I do not have a response from you within 15 days, I will forward this letter and all the information I have obtained to the Department of Justice and to my lawyer so he may start a Federal Lawsuit against you, your company and your web page designer. I do not wish to go down this road.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.