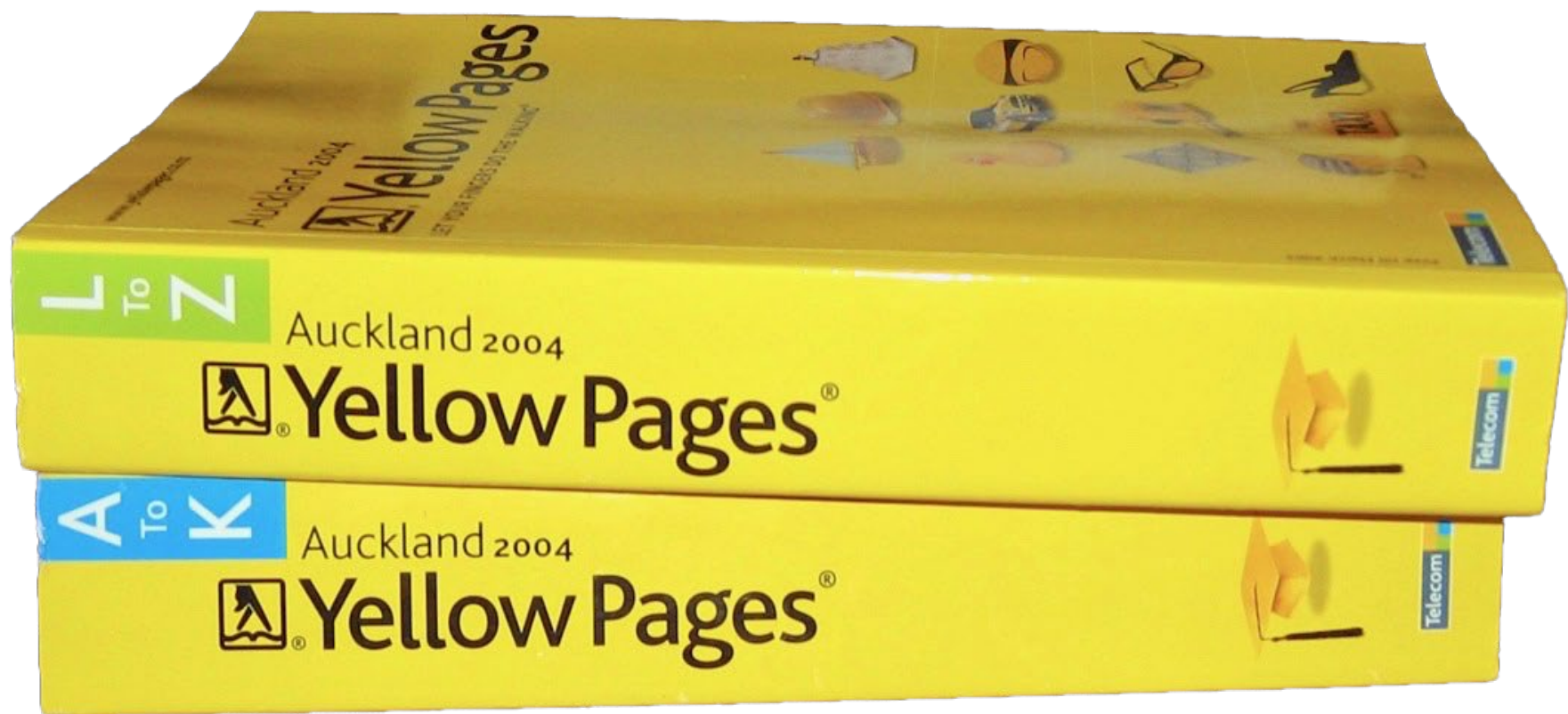


Manage Your Online Images to Minimize Liability

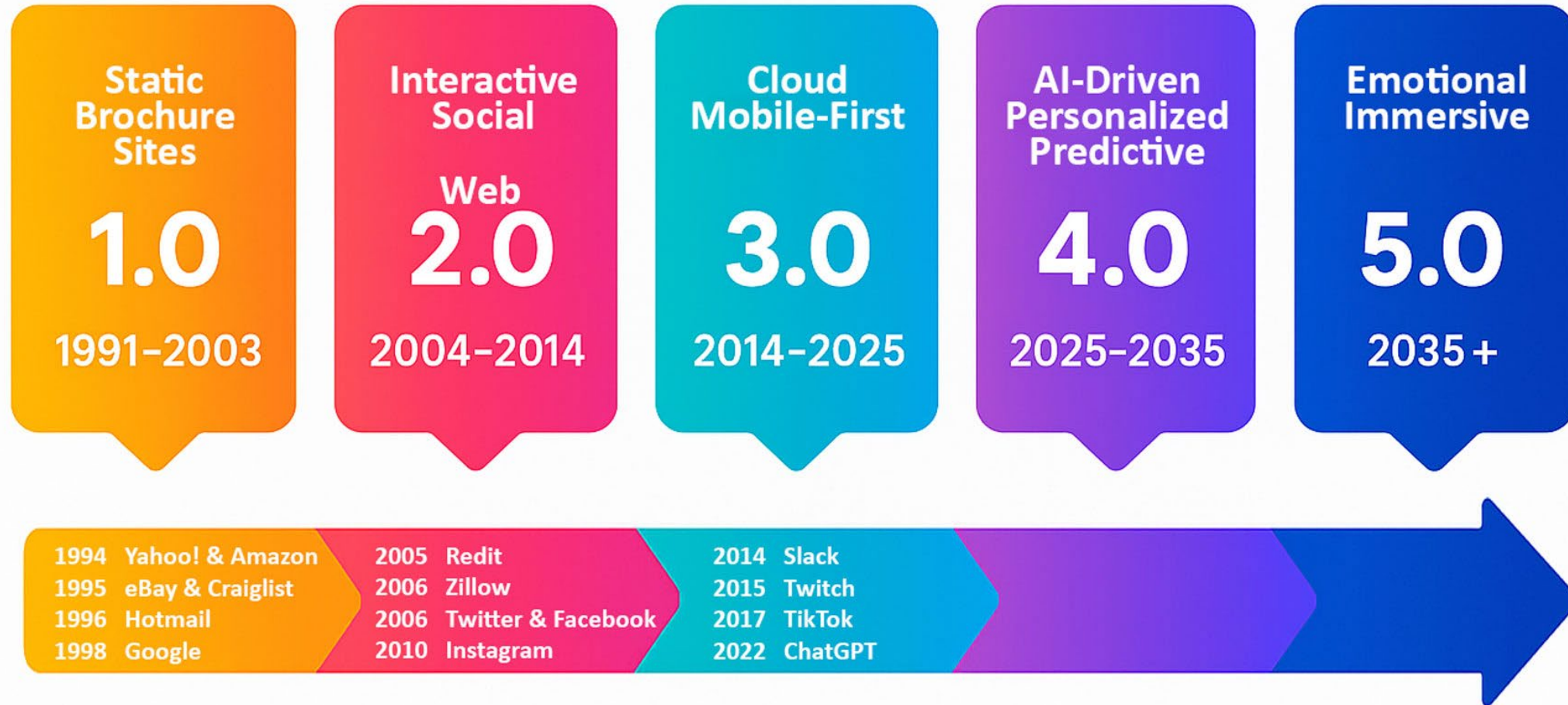
Lola Rain, www.Age-Gency.com

Tom Sanders, SeniorLivingPhotography.com





Evolution of the Web



The Letters

To All Those Concerned,

We hope this letter finds you well, especially during these challenging times. We are writing in an effort to help you achieve compliance on your website with respect to the California Fair Employment and Housing Act §§ 12955-12956.2 (“FEHA”) and the Unruh Civil Rights Act Civ. Code, § 51 et seq. (“UNRUH”).

We represent the above referenced client (hereinafter the “Client”) who is a blind individual residing in California. Our Client is committed to, inter alia, equal access, equal opportunity, and equal rights for protected classes.

While attempting to navigate your company’s (hereinafter “Company”) website at the URL stated above (hereinafter the “Website”) using screen-reading software, our Client, who has been trained to test for online accessibility for blind and/or visually disabled people, encountered multiple access barriers which denied full and equal access to information and/or services offered and made available to the public on the Website.

The challenges encountered on the Website may include, among others, missing alternative text in images, missing alternative text in image links, and unreadable social media icons. These are just a few of the numerous difficulties and challenges that appear to have been encountered.

The barriers encountered resulted in a discriminatory impact on those who are visually impaired, in violation of the FEHA and UNRUH. The discrimination is a direct result of the Company’s negligence as the law presumes the Company acted without due care and violated key provisions of the FEHA and UNRUH by publishing information on the Website which fails to provide reasonable accommodations for blind and visually impaired persons.

Our Client’s primary mission is to promote full and complete online accessibility for blind and/or visually disabled people. Although we have already incurred meaningful cost and expense

To Whom It May Concern:

This law firm has been retained by a blind California consumer to file suit against you under the California Unruh Act.

Your website [REDACTED] is not fully accessible to blind users. Both California state and federal courts have held that disability access laws apply to commercial websites that – like yours – facilitate interaction between a visitor and a physical location.¹

Because we plan to file suit in the near future, we urge you to consult counsel about your rights in this emerging area of law. Upon request, I will provide your counsel with a summary of the barriers documented on your website.

Web Content Accessibility Guidelines, version 2.1, Level AA (WCAG 2.1 AA)



Accessibility testing



Color contrast check — WebAIM tool



ALT text rules — concise, contextual, no “image of...”, 125 characters or less



Accessibility is required; 1990 Americans with Disabilities Act (ADA)

Tips & Resources

◆ Test. Test. And Test again.

✓ AccessibilityChecker.org

🎨 webaim.org/resources/contrastchecker

👉 UserWay or EqualWeb



Be inclusive and promote diversity.

The Fair Housing Act (FHA) 24 CFR Part 109 makes it unlawful to make discriminatory statements.

A screenshot of the Sequoia Living website. The header includes the logo "SEQUOIA LIVING" with the tagline "Never Stop Growing" and a navigation menu with links: Communities, About Us, Health Services, Foundation, Community Services, Resources, and a Contact Us button. The main banner features a photo of four elderly people walking in a park, with the text "DISCOVER, LEARN, GROW." and a sub-headline "A vibrant life doesn't retire. We're here to nurture curiosity, wellness, and joy at every age." Below the banner are two buttons: "Our Programs" and "Find a Community". A section titled "RECOGNITION & PARTNERSHIPS" displays several award logos. The "FIND YOUR LIFE PLAN COMMUNITY" section shows four community cards: "THE SEQUOIAS SAN FRANCISCO", "THE TAMALPAIS MARIN", "THE SEQUOIAS PORTOLA VALLEY", and "VIAMONTE AT WALNUT CREEK". Each card includes a photo of the community, a brief description, and a "Learn More" button.



Alt Tags

- ◆ Two older women cheers during happy hour.
- ◆ A white-haired senior in blue blouse drinking wine with a gray-haired Asian woman in a white blouse, cheers while a couple sits in the background near a fireplace.
- ◆ Two women and a couple enjoy happy hour at a senior living community in San Francisco.

