

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|---------------------------------|---|--------------------------|
| CHRISTINE VARAD, |) | |
| |) | |
| Plaintiff, |) | |
| |) | C.A. No. 06 CA 11370 MLW |
| v. |) | |
| |) | |
| REED ELSEVIER INCORPORATED, |) | |
| d/b/a/ Lexis Nexis Corporation, |) | |
| Lexis Nexis Accurint, |) | |
| |) | |
| Defendant. |) | |

EXHIBIT E

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 3, 2006

James Swift
Operations Manager
Lexis Nexis Accurint
6601 Park of Commerce Boulevard
Boca Raton, Florida 33487

Dear Mr. Swift,

Pursuant to the provisions of Massachusetts General Laws, chapter 93A, § 9, and also pursuant to federal standards as set forth in FTC v. Sperry & Hutchinson Co., 405 U.S. 233, 244 n.5 (1972), I hereby make written demand for relief.

On April 17, 2006, I requested pursuant to the Fair Credit Reporting Act, FCRA 15 U.S.C. 1681 et seq. and M.G.L. c. 93 § 50-62 inclusive, a complete copy of my file as held by Lexis Nexis Accurint and as disseminated to Gall and Gall Company and an opportunity to dispute and correct any and all improper and incorrect information contained therein. I informed Lexis Nexis Accurint that Gall and Gall Co. had pointed to Lexis Nexis Accurint as the source of false and injurious information that was disseminated to my employer and to others. I requested an opportunity to completely investigate all of the data contained in my file and of the databases utilized to compile that file information including all data as publicly advertised by Lexis Nexis Accurint to be routinely contained in such files or "sub second access" information detailing historical addresses, associates, relatives, business affiliates and assets of the target individual. In total, I requested that Lexis Nexis Accurint provider me with a complete copy of my file.

At that time I also requested (1) a record of each and every inquiry relating to a credit transaction of any kind, my name and the Lexis Nexis Accurint databases and files for the last two years to include (2) the name and address of each and every source of data on me as provided to and utilized by Lexis Nexis Accurint and (3) the names and addresses of the recipients of each and every inquiry request.

Lexis Nexis Accurint unfairly and deceptively failed to provide access to the file and responded in writing on April 20, 2006 by unfairly and deceptively (1) claiming as explanation for its failure to provide any requested date that Lexis Nexis Accurint is not a consumer reporting agency subject to the jurisdiction of 15 U.S. C. §1681 et seq. and specifically claiming as further as explanation for the failure to provide access to the data, (2) that Lexis Nexis Accurint data is not permitted to be utilized to make employment decisions to thereby invoke the regulations of the Fair Credit Reporting Act.

Upon information and belief, the unfair and deceptive actions of Lexis Nexis Accurint were performed willfully and knowingly. The written characterizations of the actions and responsibilities of Lexis Nexis Accurint and the subsequent treatment of my requests for data were unfair and deceptive, violated the above cited state and federal statutes as well as general principles of fair dealing and public policy.

As of the date of the writing of this demand letter I have received no file data or information in response to my multiple requests. As a result I am unable to relieve the injury and harm created and perpetuated by Lexis Nexis Accurint data dissemination, protect myself from additional injury and harm by stopping future dissemination of false and injurious data or correct and mitigate all previous injury that the Lexis Nexis Accurint data has already caused to me.

Where Lexis Nexis knew, or should have known, that (1) Gall and Gall Company is engaged in the business of providing employment background checks and (2) that Gall and Gall Company routinely uses data supplied to it by Lexis Nexis Accurint to provide background check reports to client/employers for decision-making purposes as to prospective employees, (3) where Lexis Nexis Accurint openly, knowingly and routinely permits Gall and Gall Company to use Lexis Nexis Accurint data for employment decision making purposes; (4) where Lexis Nexis Accurint is the sole source and holder of the injurious data; that Lexis Nexis Accurint's own actions subjected itself to the jurisdiction and authority of the Fair Credit Reporting Act, M.G.L. c. 93 and every single other related state and federal common law, statute and regulation governing such data compilation, retention and dissemination and that such failures resulted in a knowing and unfair deception and failure to afford me my rights under the law thereby causing injury and damage.

As a result of the unfair and deceptive acts and practices of Lexis Nexis Accurint, I have suffered injury, including defamation and financial loss.

In light of the foregoing, I demand the following relief:

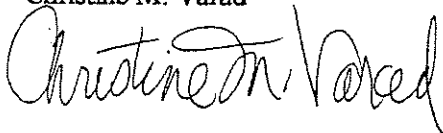
1. Immediately provide all of the requested data and information.
2. Make full restitution for lost employment and lost employment licensing opportunities resulting from the false data dissemination.
3. Make full restitution for any and all resulting defamation and related injuries.
4. Provide full and open access to my representative to Lexis Nexis Accurint premises and electronic databases therein to verify and insure that all data having any connection with me has been provided as demanded and has been corrected against any and all additional injury.

Pursuant to M.G.L. c. 93A, you have thirty (30) days from your receipt of this letter to respond with a reasonable offer of settlement. If you fail to do so, that statute provides that you will be liable for multiple damages and the attorney fees I may incur for the prosecution of this action.

I can be contacted at 781 545 5506 or by mail at the address below. Thank you for your attention to this matter.

Sincerely,

Christine M. Varad



CHRISTINE VARAD
P.O. BOX 583
MILTON, MASSACHUSETTS 02186