

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Docket No.: **06 CA 1137 MLW**

Christine. Varad,
Plaintiff,

v.

Reed Elsevier Incorporated,
d.b.a. *LexisNexis, LexisNexis Risk &
Information Analytics Group, Inc.*,
Defendant.

**PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION FOR A SUMMARY JUDGMENT**

Christine Varad v. Reed Elsevier Incorporated

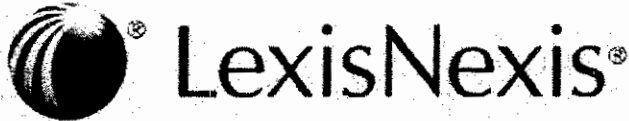
Doc. 73 Att. 1

TAB 1

Exhibit A

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LexisNexis® Data Privacy Policies
Revised August 18, 2005



LexisNexis® Data Privacy Policy

The LexisNexis Data Privacy Policy covers personally identifiable information received by LexisNexis, a division of Reed Elsevier, Inc. from its data suppliers, and which is distributed on the LexisNexis services. This personally identifiable information is contained in public records, publicly available information and non-public information (see definitions below). The LexisNexis Data Privacy Policy does not cover information that may be collected by LexisNexis from the user, whether online or offline. The LexisNexis Website Privacy Policy titled, "Privacy Notice – Your Privacy is Important to Us," governs the collection of information from users of LexisNexis websites. See <http://www.lexisnexis.com/terms/privacy/>.

LexisNexis is committed to promoting the responsible use of information and protecting individual privacy rights. In recognition of this commitment, LexisNexis adheres to the principles contained within its data privacy policy. LexisNexis recognizes that statutes such as the Driver's Privacy Protection Act (federal and state) and the Gramm-Leach-Bliley Act regulate some of the personally identifiable information distributed on the LexisNexis services. LexisNexis diligently complies with the requirements of these laws.

LexisNexis reserves the right to deviate from this Data Privacy Policy if it is required to do so by operation of law, upon request of law enforcement, or, if necessary, to prevent fraud or to maintain integrity of its computer systems.

1. DEFINITIONS.

Personally Identifiable Information

Personally identifiable information means information about a specific individual that either identifies the individual or is directly attributed to the individual. Personally identifiable information is contained in public records, non-public information and publicly available information. Examples of personally identifiable information include:

- Name;
- Address;
- Date of birth; and
- Telephone number.

Public Records

Public records are those records created and maintained by government agencies and are open for public inspection. Examples of public records include:

- Real-estate title records;
- Judgments and liens;
- Bankruptcy records;
- Motor-vehicle registrations; and
- Uniform Commercial Code (UCC) filings.

Non-Public Information

Non-public information is information about an individual obtained from a source that is privately owned and is not available to the general public. Non-public information may include the following data elements:

- Name;
- Current and previous addresses;
- Social Security number (for LexisNexis' policy on the distribution of Social Security numbers see Principle 6 below);
- Previous names used, such as alias names, maiden names or previous married names; and
- Birth date information.

Publicly Available Information

Publicly Available Information is information about an individual that is available to the general public from non-governmental sources. Sources of publicly available information include:

- Newspapers and other publications;
- Telephone directories; and
- Magazines.

Appropriate or Appropriately

Describes actions or uses that are reasonable under the circumstances reflecting a balance between the interests of individual privacy and legitimate business, governmental, and professional uses of personally identifiable information, including but not limited to:

- Prevention and detection of fraud;
- Investigation of criminal activity;
- Litigation support; and
- Enforcement of judgments.

LexisNexis® Data Privacy Policies
Revised August 18, 2005

2. EDUCATION – LexisNexis informs its employees, users and the general public about appropriate use of its products and services.

LexisNexis informs its users and employees about:

- Privacy issues associated with LexisNexis' information products and services;
- The responsible use of public records, publicly available information and non-public information; and
- The societal benefits arising from the free flow of information.

LexisNexis informs the public about:

- Privacy issues associated with LexisNexis' information products and services;
- Measures LexisNexis has undertaken to enhance consumer privacy;
- Choices available to consumers regarding information access and the ability to opt-out of its products and services containing non-public information products; and
- How consumers benefit from the responsible flow of information.

3. REPUTABLE SOURCES - LexisNexis acquires public records and non-public information from established, reputable sources in the government and private sectors.

LexisNexis acquires public records and non-public information from established, reputable sources in the government and private sectors. Reasonable steps will be taken to:

- Review the supplier's data collection practices and policies;
- Review the supplier's business practices;
- Review the financial condition of the supplier; and
- Review the types of data the supplier sells (public record, publicly available or non-public information).

LexisNexis obtains an assurance from each data supplier that the supplier has the legal right to license or sell the data to LexisNexis.

4. ACCURACY – LEXISNEXIS endeavors to accurately reproduce all information in its products.

While maintaining, using or disseminating personally identifiable information LexisNexis takes reasonable steps to accurately reproduce data it receives from its suppliers. However, due to the nature of public records, non-public information or publicly available information, it is reasonable to expect these files to contain some errors. If a record is suspected to be inaccurate, refer to Principle 10 on Access and Correctability.

For non-public information, LexisNexis will, for a nominal fee, provide individuals with copies of non-public information about themselves contained in applicable products and services to verify the accuracy of that information. For public records and publicly available information, LexisNexis will direct the consumer to the data supplier or government entity that can review the claim of inaccuracy and make appropriate corrections.

5. DISTRIBUTION OF NON-PUBLIC INFORMATION – LexisNexis distributes non-public information only to LexisNexis users.

LexisNexis distributes non-public information only to its users and not to the public in general. Typical LexisNexis users of non-public information include law firms, government agencies, law enforcement personnel, and other commercial and professional users. Users generally use non-public information to locate individuals and verify information provided to them by the individuals.

If upon investigation LexisNexis finds that non-public information is used inappropriately or unlawfully, LexisNexis will take reasonable steps to stop the misuse, educate the user concerning the appropriate and lawful use of the information, and to prevent similar future misuses. In the event of repeated misuse, LexisNexis may discontinue a user's access to LexisNexis information products and services.

LexisNexis does not collect, maintain, or distribute personal financial information such as bank account numbers and balances, credit card account information, personal information on individuals known to be minors, or mother's maiden names designated as such in non-public information files distributed as part of LexisNexis' online services.

6. DISTRIBUTION OF SOCIAL SECURITY NUMBERS AND DRIVER'S LICENSE NUMBERS – LexisNexis limits the availability of Social Security and Driver's License numbers.

Except as otherwise provided herein, a user cannot access fully displayed Social Security numbers (SSNs) from non-public information files or Driver's License Numbers (DLNs) obtained directly or indirectly from government agencies that issue driver's licenses. Users may search records using a SSN or a DLN in their possession but records retrieved will not display the full SSN or DLN.

For SSNs, users will receive SSNs with the last four characters truncated in their search results. An example of a truncated SSN is 123-45-XXXX. For Driver's license records, the DLN will not display.

LexisNexis displays full SSNs and DLNs to the following group of pre-qualified users:

- State, local and federal government entities with law enforcement responsibilities;
- Special investigative units (SIUs) and subrogation and claims departments of public or private insurance companies for the purposes of detecting, investigating or preventing fraud;
- Departments within financial institutions for the purpose of detecting, investigating or preventing fraud, for compliance with state and federal laws and regulations, and for the purpose of collecting debt on their own behalf;
- Collection departments of a creditor, collection departments of law firms, and collection companies acting on behalf of a creditor or on their own behalf; and
- Other public or private entities, on a case-by-case basis, for the purposes of detecting, investigating or preventing fraud or other criminal activities, or enforcing legal rights or remedies.

LexisNexis® Data Privacy Policies
Revised August 18, 2005

LexisNexis displays SSNs and DLNs to the pre-qualified users for the following types of authorized uses:

- Location or investigation of suspects, witnesses or criminals;
- Location of non-custodial spouses allegedly owing child support or ex-spouses allegedly owing spousal support;
- Location of individuals alleged to have failed to pay taxes or other lawful debts;
- Verification of identity; or
- Other uses similar to those described above with prior review and approval by LexisNexis.

LexisNexis does not provide SSNs from non-public information files or DLNs obtained directly or indirectly from government agencies that issue driver's licenses to the general public or to users other than the pre-qualified users described above.

LexisNexis provides verification tools to its users that will correct two mis-keyed digits in a SSN where the user provides the SSN and other required data elements.

A limited number of public records may contain SSNs. This principle does not apply to the display of SSNs found in public records.

7. SECURITY – LEXISNEXIS endeavors to keep its data secure.

LexisNexis undertakes reasonable steps to maintain facilities and systems to protect personally identifiable information from unauthorized access or access by persons who attempt to exceed their authorization.

8. NOTICE – LEXISNEXIS makes its Data Privacy Policy publicly known.

LexisNexis publicly posts this Data Privacy Policy, which include the following key principles on its website, <http://www.lexisnexis.com/terms/privacy/data/>:

1. Definitions;
2. Education;
3. Reputable Sources;
4. Accuracy;
5. Distribution of Non-Public Information;
6. Distribution of Social Security Numbers and Driver's License Numbers;
7. Security;
8. Notice;
9. Choice;
10. Access and Correctability;
11. Children; and
12. Compliance.

For additional information about the LexisNexis Data Privacy Policy contact the LexisNexis Privacy Manager at 1-800-831-2578 or by mailing:

Privacy Manager
LexisNexis
PO Box 933
Dayton, Ohio 45401

LexisNexis® Data Privacy Policies
Revised August 18, 2005

9. CHOICE - LexisNexis will allow certain individuals to opt-out of its non-public information databases containing sensitive information, under certain circumstances and conditions.

LexisNexis will consider a request for opt-out from its non-public information databases containing Social Security numbers in the following circumstances:

- The individual is a state, local or federal law enforcement officer or public official whose position exposes him or her to a threat of imminent harm;
- The individual is a victim of identity theft; or
- The individual is at risk of physical harm.

In order to have a request for opt-out considered, an individual must submit the following with the request, where applicable:

- If the individual is a law enforcement officer or public official, a letter from a supervisor must be submitted;
- If the individual is an identity theft victim, a copy of a police report documenting the individual's identity theft and an Identity Theft Affidavit must be submitted;
- If the individual is at risk of physical harm (other than as a law enforcement officer), a protective court order, a copy of a police report or similar documentation such as a letter from a social worker, a shelter administrator or a health care professional must be submitted.

In addition, LexisNexis will consider requests for opt-out for good cause. For all opt-out requests, LexisNexis retains the right to determine whether to grant or deny the request, the databases to which the request for removal will apply, and the duration of the removal period.

10. ACCESS & CORRECTABILITY – LexisNexis provides the public access to information about its products.

LexisNexis will upon request, inform individuals about the nature of the public records, non-public information, and publicly available information that LexisNexis makes available in its information products and services.

LexisNexis will

- Provide individuals with copies of non-public information about themselves contained in its information products and services for a nominal fee that is matched to the information provided by the individual;
- Take reasonable steps to verify an individual's identity prior to the release of any information to the individual;
- Direct individuals to the government and private entities which collect and maintain public records and publicly available information to correct any claimed inaccuracies found in that data; and
- Direct individuals to consumer reporting agencies where such agency is the source of the information about the individual and where the individual seeks to correct claimed inaccuracies found in that data.

For more information see the LexisNexis website
<https://web.lexis.com/ConsumerAccess/ConsumerAccess.asp>.

LexisNexis® Data Privacy Policies
Revised August 18, 2005

11. CHILDREN – LEXISNEXIS does not distribute information from non-public information files about people known to be under the age of 18.

Where an individual is identified in a record from a non-public information file as being under the age of 18, the information in that record about that individual will not be distributed by LexisNexis other than for activities such as the location of missing children or other law enforcement activities.

LexisNexis does not attempt to screen public records or publicly available information for references to individuals under the age of 18. Consequently, information about persons under the age of 18 may appear in these records.

12. COMPLIANCE – LEXISNEXIS will comply with its data privacy policy.

LexisNexis regularly monitors its business practices to ensure compliance with this Data Privacy Policy.

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TAB 1

Exhibit B



LexisNexis

LexisNexis Completes Acquisition of Seisint, Inc.

Acquisition Enhances Ability to Provide Customers with Powerful, Fast and Easy-to-Use Risk Management Products and Services

DAYTON, OH, September 01, 2004 - LexisNexis U.S., a leading provider of legal, news and business information services, announced today that it has closed on its acquisition of Seisint, Inc., a U.S.-based provider of information management products and services, for \$775 million. LexisNexis is a member of Reed Elsevier Group plc [NYSE: ENL; NYSE: RUK].

Contact Information

LexisNexis:
Steve Edwards
steve.edwards@lexisnexis.com
Local: (937) 865-8838
Toll Free: (800) 227-9597
Ext. 58838

Seisint will become part of the LexisNexis U.S. Risk Management business of the Corporate and Public Markets division. The LexisNexis Risk Management business includes flagship products such as RiskWise®, PeopleWise® and Banko®. Risk Management products and services are used by lawyers, financial services, insurance, telecommunications and retail businesses, the Federal Government and law enforcement agencies. Those products and services are used to authenticate identity, predict fraud, control credit and fraud losses, to improve risk assessment and communicate with customers during the customer-management cycle. LexisNexis PeopleWise services help companies create better, more productive workplaces through pre-employment screening and background checking.

The technology and products developed by Seisint will fortify the LexisNexis capabilities in identity authentication, fraud prevention, credit and security risk products. The acquisition will allow LexisNexis to offer its customers expanded data, technology and product offerings.

Seisint provides information products that allow business, financial services, legal and government customers to quickly and easily extract valuable knowledge from a vast array of data. Its products, including Accurint™ and Securint™, support customers in critical activities such as debt recovery, due diligence, fraud detection, identity verification, law enforcement, legal investigations, pre-employment screening, resident screening, and data supercomputing. Seisint's services and products are supported by integrating the Seisint Data Supercomputer technology and patent-pending data linking methods.

About LexisNexis

LexisNexis® (www.lexisnexis.com) is a leader in comprehensive and authoritative legal, news and business information and tailored applications. A member of Reed Elsevier Group plc [NYSE: ENL; NYSE: RUK] (www.reedelsevier.com), the company does business in 100 countries with 13,000 employees worldwide. In addition to its flagship Web-based Lexis® and Nexis® research services, the company includes some of the world's most respected legal publishers such as Martindale-Hubbell, Matthew Bender, Butterworths, JurisClasseur, Abeledo-Perrot and Orac.

Through its risk management flagship products, RiskWise[®], PeopleWise[®] and Banko[®], LexisNexis Risk Management helps to locate people and assets, authenticate identity, enable commerce, conduct background screening, and support national security initiatives. Customers include government agencies, top law firms and major corporations. For more information, contact www.lexisnexis.com/riskmanagement.

Total Solutions: Legal Corporate & Professional Government Risk Management Academic

LexisNexis Global Home Site Map Product Index

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TAB 1

Exhibit C



LexisNexis

LexisNexis Investigates Compromised Customer IDs And Passwords to Seisint U.S. Consumer Data

Issued by Reed Elsevier PLC and Reed Elsevier NV

DAYTON, OH, March 09, 2005 - Reed Elsevier today announced that LexisNexis, its global legal and business information business, has identified a number of incidents of potentially fraudulent access to information about U.S. individuals at its recently acquired Seisint unit. The incidents arose from the misappropriation by third parties of IDs and passwords from legitimate customers. LexisNexis has notified law enforcement authorities and is proactively assisting in law enforcement investigations of these incidents. LexisNexis is also working with customers to enhance security procedures.

These incidents were identified as part of an ongoing extensive review of the verification, authorization and security procedures and policies across the risk management businesses. LexisNexis has accelerated this review to determine the extent of any other incidents.

Information on approximately 32,000 individuals may have been fraudulently accessed in these incidents. LexisNexis very much regrets this and will be notifying all the individuals concerned and providing them with ongoing credit monitoring and practical support to ensure that any identity theft is quickly detected and addressed. Any further instances that emerge from the ongoing review will likewise be handled as quickly and as sensitively as possible. The information accessed includes names, addresses, social security and drivers' license numbers, but not credit history, medical records or financial information.

LexisNexis has already taken, or will take actions to enhance security to enable it to maintain its position as an industry leader in the responsible use of data and the protection of individual privacy. These actions include: enhancing ID and password administration procedures and requirements for customers; dedicating additional resources to protection of consumer privacy; working with customers to reinforce the importance of consumers' privacy; and working with law enforcement for further insight and assistance on new practices and techniques for thwarting criminal activities.

The financial implications are expected to be manageable within the context of LexisNexis' overall growth. The demand for risk management solutions is expected to remain strong and the outlook for Seisint and the LexisNexis risk management business remains very positive. In relation to this, Reed Elsevier today reaffirmed its 2005 and longer term financial targets of at least 5% organic revenue growth and double digit adjusted earnings per share growth at constant rates of exchange.

LexisNexis products that use U.S. public and non-public records provide critical fraud detection and identity authentication solutions to law enforcement, homeland security,

Contact Information

LexisNexis:
For media inquiries only
 Sean McCabe
smccabe@crc4pr.com
 Local: (703) 683-5004
 Ext. 110

Privacy Facts:
Get more information
 regarding LexisNexis
 and data privacy. ►►

LexisNexis Seisint Security Investigation
Number of Affected Consumers
by State

commercial and legal customers that help to safeguard citizens and reduce consumers' financial losses, such as credit card and insurance fraud. In addition, these services provide benefits for consumers in facilitating the conduct of transactions for goods and services.

As a leader in the information services industry for over 30 years, LexisNexis is fully committed to safeguarding public and non-public information about individuals and consumers with effective verification, authorization and security processes and policies, both by its businesses and customers. LexisNexis will continue its long-time efforts to support effective data privacy policy and practices that benefit consumers, the government agencies that serve and protect them and the organizations they do business with.

Forward looking statements

This announcement contains forward-looking statements within the meaning of Section 27A of the U.S. Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended. These statements concern future matters, such as the features and functions of, and markets for, products and services offered by Reed Elsevier, and Reed Elsevier's business plans and strategies. Forward-looking statements are based on the current expectations of the management of Reed Elsevier and are subject to risks and uncertainties. Actual results and events could differ materially from the results discussed in the forward-looking statements. Factors which could cause or contribute to differences in results include, but are not limited to, general economic conditions and business conditions in Reed Elsevier's markets, customers' acceptance of its products and services, the actions of competitors, legislative, fiscal and regulatory developments, changes in law and legal interpretation affecting Reed Elsevier's intellectual property rights, and the impact of technological change. Reed Elsevier is not under any obligation (and expressly disclaims any such obligation) to update or alter its forward-looking statements whether as a result of new information, future events or otherwise.

Notes to Editors

LexisNexis® (www.lexisnexis.com) is a global leader in comprehensive and authoritative legal, news and business information and tailored applications. A member of the Reed Elsevier Group plc, the company does business in 100 countries with 13,500 employees worldwide. In addition to its flagship Web-based Lexis® and Nexis® research services, the company includes some of the world's most respected legal publishers such as Martindale-Hubbell®, Matthew Bender®, Butterworths, JurisClasseur, Abelledo-Perrot and Orac.

Reed Elsevier Group plc (www.reedelsevier.com) is a world leading publisher and information provider. It is owned equally by its two parent companies, Reed Elsevier PLC and Reed Elsevier NV. The parent companies are listed on the London, Amsterdam and New York Stock Exchanges, under the following ticker symbols: London: REL; Amsterdam: REN; New York: RUK and ENL. In 2004, Reed Elsevier made adjusted profit before taxation of £1,027 million/€1,510 million on turnover of £4,812 million/€7,074 million. The group employs 35,600 people, including approximately 22,000 in North America. Operating in the scientific, legal, educational and business-to-business sectors, Reed Elsevier provides high value and flexible information solutions to professional end users, with increasing emphasis on internet delivery.

Privacy Facts:
Get more information
regarding LexisNexis
and data privacy. ▶▶

Total Solutions: Legal Corporate & Professional Government Risk Management Academic

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LexisNexis Seisint Security Investigation
Number of Affected Consumers by State

State	Count
Armed Forces	19
Alaska	51
Alabama	137
Arkansas	117
Arizona	301
California	11680
Colorado	263
Connecticut	185
District of Columbia	34
Delaware	26
Florida	1651
Georgia	576
Hawaii	102
Iowa	105
Idaho	89
Illinois	481
Indiana	163
Kansas	42
Kentucky	102
Louisiana	195
Massachusetts	3953
Maryland	330
Maine	189
Michigan	318
Minnesota	208
Missouri	124
Mississippi	90
Montana	31
North Carolina	357

North Dakota	1
Nebraska	53
New Hampshire	146
New Jersey	554
New Mexico	70
Nevada	323
New York	2590
Ohio	383
Oklahoma	156
Oregon	201
Pennsylvania	435
Puerto Rico	34
Rhode Island	704
South Carolina	110
South Dakota	22
Tennessee	249
Texas	1246
Utah	86
Virginia	519
Vermont	15
Washington	357
Wisconsin	79
West Virginia	31
Wyoming	13
Total	30296

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TAB 1

Exhibit D



LexisNexis

LexisNexis & Privacy Privacy Protection

This data privacy policy applies to personally identifiable information products received by LexisNexis from data suppliers, which is distributed on the LexisNexis services. This data privacy policy does not apply to data collected from visitors to the LexisNexis Web site.

At no other time in history has access to, and dissemination of, information been such a critical element of business and commerce in the United States and throughout the world. At the same time, public concern, especially in the area of privacy, is also running at a high level.

As an industry leader in the acquisition, management and dissemination of critical business, government and legal information, LexisNexis and its employees adhere to the highest ethical standards in providing outstanding service to its customers. LexisNexis does so while respecting individuals' privacy with regard to personally identifiable information contained in its information products.

Our position as a leader in the information industry with respect to protecting individual privacy has been acknowledged by the Federal Trade Commission (FTC), many members of Congress, and LexisNexis customers.

LexisNexis remains committed to the responsible use of personally identifiable information and safeguarding individual privacy. LexisNexis will comply with all applicable law regarding the collection, use and distribution of personally identifiable information. The [LN Data Privacy Policy](#) (PDF, 47K) includes principles on education, security, notice, choice, access and correctability, children and compliance.

Read more about our Data Privacy Policy:

- [Requesting Opt-Out](#)
- [Get Copies of Information About Yourself](#)
- [People Locator Services Privacy Statement](#)
- [Types of Information in General](#)
- [Questions About Privacy Statements](#)
- [Online Privacy Alliance](#)

2.

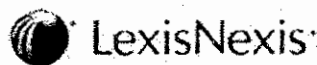
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Privacy Facts from LexisNexis®

Privacy Facts

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- ▶ [Resources for the Media](#)

Working to Safeguard Public and Non-Public Information about Individuals

LexisNexis takes privacy and security seriously. We understand and accept the responsibilities associated with safeguarding sensitive data. LexisNexis products that use public records and non-public information provide invaluable fraud detection and identity authentication solutions to law enforcement, homeland security, commercial and legal customers that help to safeguard citizens and reduce consumers' financial losses. This information is restricted to legitimate, customers for legally permissible uses, and helps to prevent fraud, reduce the risk of terrorist attacks, and help find missing children, among other important applications.

LexisNexis will continue its support and implementation of effective data privacy policy and practices. LexisNexis products benefit consumers, the government agencies that serve them and the organizations they do business with. We must remember we all — LexisNexis, our customers and consumers — put our best interests forward to thwart determined identity thieves.

Links to Identity Security Resources

- [Separating Identity Theft, Credit Theft, and Identity Theft](#) article
- [U.S. State A](#)
- [U.S. Government Center Web site THEFT \(1-877\)](#)
- [Annual Credit Ordering](#)
- [Federal Trade Commission Consumer Guide to Identity Theft](#)



LexisNexis®

Consumer Access Program

Obtaining copies of information about you from the person report products

Upon request and with proper identification, LexisNexis will provide individuals with a copy of the information about themselves contained in the person report products distributed through the Accurint information services for a nominal fee.

What types of information are included in the Person Report Products?

A person report includes public record, non-public and publicly available information. View a sample person report. Public records are those records created and maintained by government agencies and are open for public inspection such as real estate title records, liens, death records, and motor vehicle registrations.

Non-public information is information about an individual obtained from a source that is privately owned and is not available to the general public. Non-public information may include the following data elements:

- Name;
- Current and previous addresses;
- Social Security number;
- Previous names used, such as alias names, maiden names or previous married names;
- Birth date information; and/or
- Telephone numbers.

Publicly available information is information about an individual that is available to the general public from non-governmental sources such as newspapers and magazine articles and telephone directories.

How do I request a copy of my person report information?

(PLEASE NOTE: Information submitted to LexisNexis as part of a request for a copy of information about yourself will be used solely in fulfillment of that request for information and for no other purpose.)

You can request a copy of your person report found in the Accurint services by using a **secure electronic Web form**. A charge of \$8.00 for this service will be required via credit card when using this form.

You can also order a copy of the person reports about yourself by sending this printable

form (PDF, 20K), two forms of identification (one must be a government issued ID), along with an \$8.00 check or money order, to:

**LexisNexis Consumer Access Program
Attn: Consumer Inquiry Department
6601 Park of Commerce Blvd.
Boca Raton, FL 33487**

How long will it take to receive my report?

Your person report will be returned to you via U.S. Mail after LexisNexis receives proof of your identification. LexisNexis must verify your name and address before processing this request to ensure your personal privacy.

Can I order another individual's person report?

No, you may only order a person report pertaining to yourself. LexisNexis takes cautionary steps to protect your privacy and to prevent others from obtaining a copy of your information. Also, you must be over 18 to order a copy of your person report. A government issued ID is required to process your order.

Who do I contact if I have questions about the Consumer Access Program?

If you have any questions about the LexisNexis Consumer Access Program, you may write to:

**LexisNexis Consumer Access Program
Attn: Consumer Inquiry Department
6601 Park of Commerce Blvd.
Boca Raton, FL 33487**

Or you may call 1-888-332-8244, select option 1 and then enter ext. 94498.

Updated April 24, 2007

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LexisNexis®

Privacy Statement

Your Privacy is Important to Us

Effective March 6, 2006

(March changes added the following Web sites to this policy: accurint.com, expscreening.lexisnexus.com, and accurintbusiness.com)

Our Commitment To Privacy

Your privacy is important to us. To better protect your privacy we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available on our home page and at every point where personally identifiable information may be requested.

This notice applies to all information collected from or submitted to the following LexisNexis Group ("LNG") Web sites, but to make this notice easier to read we will use the term "our Web site", which means *lexisnexus.com*, *lexis.com*®, *nexis.com*SM, *lexisONE.com*®, *martindale.com*SM, *lawyers.com*SM, *accurint.com*, *expscreening.lexisnexus.com*, and *accurintbusiness.com*. Other LNG Web sites may operate under their own privacy notices.

Our Web site contains links to other Web sites operated by third parties. LNG is not responsible for the privacy practices or policies of such third party web sites and this Notice does not apply to those Web sites.

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Application of This Notice

This Notice applies only to the information collected by LNG from the users of our Web site. It does not apply to information collected by LNG in any other way, including offline.

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The Information We Collect

Our Web site is not set up to automatically collect personally identifiable information from each visitor to our Web site. It does recognize the home server of visitors, but not email addresses. For example, we can tell which Internet Service Provider our visitors use, but not the names, addresses or other information about our visitors that would allow us to identify the particular visitors to our Web site. This information is used only for internal purposes by our technical support staff.

Our Web site does track certain information about the visits to our Web site. For example, we compile statistics that show the numbers and frequency of visitors to our Web site and its individual pages. These aggregated statistics are used internally to improve our Web site and for product development and marketing purposes generally. Those aggregated statistics may also be provided to advertisers and other third parties,

but again, the statistics contain no personal information and cannot be used to gather such information.

In a few areas on our Web site, we ask you to provide information that will enable us to verify whether you are entitled to access and use certain information, materials and services available from our Web site, or to enable us to enhance your site visit, to assist you with customer service or technical support issues, or to follow up with you after your visit, or to otherwise support your customer relationship with LNG. It is completely optional for you to participate. However, failure to participate may mean that you cannot access and use certain information, materials and services.

For example, we request information from you when you:

1. Log on to certain areas of our Web site, such as the *lexis.com*® Research System, where you may be prompted to provide us with your LexisNexis® ID number and password as a condition to gaining access to certain information, materials or services
2. Register or sign up to use a service such as *lexisONE.com*®
3. Subscribe to a newsletter or desire to be added to our mailing lists for other products or services
4. Place an order
5. Participate in a sweepstakes or other promotional offer
6. Provide feedback in an online survey.

In each of the instances above, we typically ask for your name, email address, phone number, address, law practice information, product preference information, LexisNexis ID number and password, as well as other similar personal information that is needed to register or subscribe you to services or offers. On occasion, we may ask for additional information to enable us to provide you with access to and use of certain information, materials and services. In the case of newsletters or mailing lists, you will be able to "unsubscribe" to these mailings at any time.

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How We Use Information: LNG Only Uses Your Personal Information for Specific Purposes

The personal information you provide to us when using our Web site, such as your name, postal or email address or telephone number will be kept confidential and used to support your customer relationship with LNG, and to notify you of special offers, updated information and new products and services from LNG, offers from third parties that we think may be of interest to you, or used by LNG or third parties for the purpose of conducting market research or surveys on behalf of LNG. Agents or contractors of LNG who are given access to your personal information will be required to keep the information confidential and not use it for any other purpose than to carry out the services they are performing for LNG.

LNG may enhance or merge your information collected at its Web site with data from third parties for purposes of marketing products or services to you.

With respect to network advertising companies (companies that manage and provide advertising for numerous unrelated companies), to the extent that LNG utilizes such advertising companies to provide advertisements on our Web site, LNG may provide them with your log-in name and any demographic information about you that we collect. Those advertising companies may combine that data with non-personally

identifiable data collected by the advertising company from your computer solely for the purpose of delivering on our Web site advertisements that are targeted to you.

Circumstances may arise where we are required to disclose your personal information to third parties for purposes other than to support your customer relationship with LNG, such as in connection with a corporate divestiture or dissolution where we sell all or a portion of our business or assets (including our associated customer lists containing your personal information), or if disclosure is required by law or is pertinent to judicial or governmental investigations or proceedings.

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You Can Opt Out of Receiving Further Marketing from LNG at Any Time

We will send you information about our various products and services, or other products and services we feel may be of interest to you. Only LNG (or agents or contractors working on behalf of LNG and under confidentiality agreements) will send you these direct mailings. If you do not want to receive such mailings, simply tell us when you give us your personal information. Or, at any time you can easily opt out of receiving further marketing from LNG by emailing us at legalnotices@LexisNexis.com.

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Our Commitment to Data Security

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

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How You Can Access or Correct Your Information

You can request a copy of the personally-identifiable information that LNG has collected about you via the Internet by contacting our Information Privacy Manager at the address below. You can also have factual inaccuracies in this information corrected by contacting this same person.

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How to Contact Us

If you would like to contact us for any reason regarding our privacy practices, please write us at the following address:

Privacy Information Manager, c/o LexisNexis, P.O. Box 933 Dayton, OH 45401, or call us at 1-800-831-2578.

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LexisNexis®

People Locator Products & Services Data Privacy Policy

Striving For Openness

The purpose of this data privacy policy is to describe what types of personally identifiable information the company has in its people locator products and services, the types of sources from which this information is collected, the types of customers to whom it is distributed, and the types of uses to which the information is put. This statement also informs you of the options available to you to limit the information that is distributed about you in the LexisNexis people locator information products and services. Finally, this statement informs you how for a fee you can obtain a copy of the non-public information in the LexisNexis locator information products and services that identifies you.

People Locator Files Offered by LexisNexis

The people locator information products and services currently offered by LexisNexis are:

- P-TRAK file
- P-SRCH file
- PSRCH2 file
- P-FIND file
- P-CNSR
- EZFIND file
- ALLFND file
- USFIND file
- X-TRAK file
- X-SRCH file
- XSRCH2 file
- XZFIND file
- XLLFND file
- Person Report

How are our People Locator Products Used?

This statement describes only information practices in connection with LexisNexis people locator information products and services. These are products and services that provide information that assists users in identifying individuals, verifying identities, and locating individuals for various legitimate purposes. The people locator information products and services currently offered by LexisNexis are listed above. Read the [LexisNexis Data Privacy Policy \(PDF, 47K\)](#) for more information.

Who Are Our Subscribers?

Subscribers to the LexisNexis people locator information products and services consist primarily of legal and other professionals, corporations, and government officials. They use information from the LexisNexis people locator information products and services for a wide variety of tasks including legal research and case preparation, identifying, verifying, and locating parties to litigation, heirs, witnesses, and pension beneficiaries. LexisNexis does not at this time distribute its locator information products and services to the general public.

Posted July 14, 2005

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LexisNexis®

Types of Information In General

LexisNexis people locator products and services contain either public record information, publicly available information, non-public information, or a combination of these types of information. As explained below, the source of the information determines its status.

Personally Identifiable Information is information that identifies an individual and may be found in public records, non-public information and publicly available information.

Public records are those records created and maintained by the government that are open for inspection. Examples of public records include state and federal court decisions, state and federal statutes and regulations, corporation records maintained by a state office of the secretary of state, and real estate filings maintained by a county recorder or register of deeds.

Publicly available information is information about an individual that is available to the general public from non-governmental sources. Examples of publicly available information include newspaper reports, publications, telephone and business directories, and classified ads.

Non-public information is information about an individual that is of a private nature and neither available to the general public or obtained from a public record. Non-public information products may include the following data elements:

- Name;
- Current and previous addresses;
- Social Security number (for LN's policy on the distribution of Social Security numbers, see the LexisNexis Data Privacy Policy, Principle 6);
- Previous names used, such as alias names, maiden names, or previous married names, and;
- Birth date information.

Posted January 14, 2002

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LexisNexis®

Data Privacy Policy Opt-Out Requests

Removing Yourself From Non-Public Information

LexisNexis voluntarily offers individuals the opportunity to request that records about themselves be removed, under certain terms and conditions, from its non-public information databases. The policy governing the LexisNexis Opt-Out Program is not legally mandated by any state or federal law.

An individual may request opt-out if one of these conditions exists:

- You are a state, local or federal law enforcement officer or public official and your position exposes you to a threat of death or serious bodily harm; or
- You are a victim of identity theft; or
- You are at risk of physical harm.

To request that information about you be removed you must provide LexisNexis with the following information where applicable:

- If you are a law enforcement officer, you must submit a letter from your supervisor stating that your position exposes you to a threat of death or serious bodily harm, a copy of a valid government-issued photo identification card and a completed Law Enforcement Affidavit; or
- If you are a victim of identity theft, you must submit a copy of a police report documenting the identity theft, a copy of a valid government-issued photo identification card, proof of residency during the disputed matter and a completed Identity Theft Affidavit; or
- If you are at risk of physical harm and are not involved in law enforcement, you must submit a copy of a protective court order, a copy of a police report or similar documentation such as a letter from a social worker, a shelter administrator or a health care professional, a copy of a valid government-issued photo identification card and a completed Risk of Physical Harm Affidavit.

To complete your request for opt-out, submit the following information using this template to LexisNexis (use of LexisNexis affidavits will ensure that you provide all of the necessary information to complete your request):

- Your complete name and address information including:
 - First Name
 - Last Name
 - Street Number
 - Street Name
 - City
 - State
 - Zip Code
 - Full Date of Birth (DD/MM/YYYY)
 - Social Security Number (Optional) – providing a Social Security number will increase the ability to make a precise match.

- A copy of a valid government-issued photo identification card.

- The required documentation depending on the condition that applies to your situation (law enforcement, identity theft, or risk of physical harm).

You may submit your request by:

- Mail to:
LexisNexis Opt-Out,
PO Box 933
Dayton, OH 45401

- Fax to:
LexisNexis Opt-Out: 1-800-732-7672

LexisNexis will review your request for opt-out upon the receipt of the required documentation. LexisNexis retains the right to determine the databases to which the request for removal will apply and the duration of the removal period. In addition, LexisNexis will consider requests for opt-out for good cause and retains the right to determine whether to grant or deny such requests.

A letter responding to your request will be sent to you within 90 days of the receipt of your completed request.

PLEASE NOTE: Information submitted to LexisNexis as part of a request for suppression will be used solely in fulfilling the request and for no other purposes.

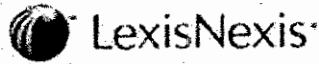
Revised May 12, 2006

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Privacy Facts from LexisNexis®

Privacy Facts

- ▶ [Privacy Facts Home](#)
- ▶ [LexisNexis Data Privacy Policy](#)
- ▶ [Resources for LexisNexis Customers](#)
- ▶ [Resources for General Consumers](#)
- ▶ [Resources for Consumers Who Received a Letter](#)
- ▶ [Resources for the Media](#)

Resources for Consumers Who Received a Letter

LexisNexis mails letters via U.S. Postal Service first-class mail to those individuals whose information may have been accessed in an unauthorized manner.

If you receive a letter from LexisNexis, this message is for you.

LexisNexis is working with [Equifax](#), a global credit reporting company that offers a range of management and identity theft protection services, to help recipients of the letter to monitor their credit reports for one year.

Equifax will help you protect your identity and your credit infor these steps:

- **Place a Fraud Alert on your credit report.** This stateme creditors of the possibility of fraudulent activity within yo and requests that they contact you prior to establishing any your name. Once the fraud alert has been placed with Equi notification will be sent to the other two credit reporting co Experian and Trans Union.
- **Enroll in Equifax Credit Watch and obtain your 3-in-1 Report.** These Equifax offerings will provide you with an warning system" to key changes to your Equifax credit file you understand the content of your credit file at the three c agencies. You will also receive a 3-in-1 credit report to hel understand your credit history based on reports from all th reporting companies.

Links to Ider Security Res

- [Separating I in ID Theft, CI article](#)
- [U.S. State A](#)
- [U.S. Govern Center Web si THEFT \(1-877](#)
- [Annual Cred Ordering](#)
- [Federal Trac Consumer Gu Fraud](#)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Docket No.: 06 CA 1137 MLW

Christine Varad,
Plaintiff,

v.

Reed Elsevier Incorporated,
d.b.a. *LexisNexis, LexisNexis Risk &
Information Analytics Group, Inc.*,
Defendant.

**PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION FOR A SUMMARY JUDGMENT**

TAB 2

Exhibit A

FILE# 75270 : VARAD, CHRISTINE

Page 1 of 4 *MoJ*



APPLICANT SCREENING REPORT

3555 N DIXIE DR * DAYTON OH 45414
 PHONE 937-234-4900 * 800-759-4255
 FAX 937-264-4909 * 800-735-7393

FILE#	75270 / ES1165	REPORT DATE	02/06/2006	AMANDA MEYERS
REPORT TO	F&W PUBLICATIONS ES1165	DATE ORDERED	02/01/2006	AMY BREWER
STREET	4700 E GALBRATH	REPOSITORIES		
CITY,ST,ZIP		TYPE	F&W PUBLICATIONS	

APPLICANT INFORMATION

APPLICANT	VARAD, CHRISTINE M	SSN/SEC	013-42-9612	DOB	04/30/1955
ADDRESS	88 GREENFIELD LN	CITY/ST/ZIP	SCITATE, MA 02066		

INVESTIGATIVE

COUNTY CRIMINAL RECORDS SEARCH

RESULTS NO REPORTABLE RECORDS FOUND

NAME(S) SEARCHED VARAD, CHRISTINE M

ALTERNATIVE IDENTIFIERS MOONEY, CHRISTINE

DOB(S) SEARCHED 04/30/1955

JURISDICTION(S) MA-PLYMOUTH

CAUTION: Based On The Information Provided We Searched The Above Mentioned Jurisdiction(s) For Criminal Convictions For No Less Than Ten Years Unless Specified And Found No Individual By This Identification. This Means That No One By This Identification Has Been Found As Convicted Of A Criminal Charge In These Jurisdiction (s). Further Investigation Into Additional Jurisdictions May Be Warranted. Please Call For Assistance.

RESULTS NO REPORTABLE RECORDS FOUND

NAME(S) SEARCHED VARAD, CHRISTINE M

ALTERNATIVE IDENTIFIERS MOONEY, CHRISTINE

DOB(S) SEARCHED 04/30/1955

JURISDICTION(S) MA-NORFOLK

CAUTION: Based On The Information Provided We Searched The Above Mentioned Jurisdiction(s) For Criminal Convictions For No Less Than Ten Years Unless Specified And Found No Individual By This Identification. This Means That No One By This Identification Has Been Found As Convicted Of A Criminal Charge In These Jurisdiction (s). Further Investigation Into Additional Jurisdictions May Be Warranted. Please Call For Assistance.

INSTACRIMINAL NATIONAL (MULTISTATE) SEARCH

FILE# 75270 : VARAD, CHRISTINE

Page 2 of 4

RESULTS NO REPORTABLE RECORDS FOUND

NAME(S) SEARCHED CHRISTINE VARAD

DOB SEARCHED 04/30/1955

JURISDICTIONS SEARCHED

AK AOC,AK Sex Offender,AL DOC,AL Sex Offender,AR AOC,AR DOC,AR Sex Offender,AZ Maricopa Superior Archive,AZ Maricopa Felony,AZ Maricopa Misdemeanor,AZ AOC,AZ Pima,AZ Mohave,AZ DOC,AZ Maricopa Superior,AZ Sex Offender,CA Fresno Index,CA Orange,CA Sacramento,CA Riverside,CA Los Angeles,CA Santa Clara,CA San Bernardino,CA Santa Barbara,CA Santa Cruz,CA Alameda,CA Butte,CA Contra Costa Municipal,CA Contra Costa Superior,CA Fresno,CA Indio,CA Marin Municipal,CA Marin Superior,CA San Diego Municipal,CA San Diego Superior,CA San Luis Obispo,CA Santa Clara Municipal,CA Ventura,CA San Mateo,CA Sex Offender,CO Archived Sex Offender,CO Sex Offender,CT Judicial Information System,CT DOC,CT Traffic,CT Sex Offender,CT Out of State Sex Offender,DC DOC,DC Sex Offender,DE Sex Offender,FL Pinellas,FL DOC,FL AOC,FL Osceola,FL Miami Dade,FL Brevard,FL Charlotte,FL Orange,FL Bay,FL Duval,FL Hillsborough,FL Palm Beach,FL Hernando,FL Indian River,FL Lee,FL Pasco,FL Suwannee,FL Monroe,FL Highlands,FL Alachua,FL Broward,FL Sex Offender,GA DOC,GA Bureau of Investigations,GA Decatur Arrest Records,GA Sex Offender,HI Sex Offender,IA DOC,IA AOC,IA Sex Offender,ID DOC,ID Sex Offender,IL DOC,IL Cook,IL Sangamon,IL Peoria,IL Sex Offender,IN DOC,IN Sex Offender,KS DOC,KS Sedgwick,KS Sedgwick Archive,KS Sex Offender,KY DOC,KY Lexington Fayette,KY Sex Offender,LA Sex Offender,MA Sex Offender,MD DOC,MD Sex Offender,ME DOC,ME Sex Offender,MI DOC,MI OTIS,MI Wayne,MI Sex Offender,MN DOC,MN DPS,MN Sex Offender,MO DOC,MO Sex Offender,MO Cape Girard Sex Offender,MO Cole Sex Offender,MO Barton Sex Offender,MO Jefferson Sex Offender,MO Newton Sex Offender,MO Laclede Sex Offender,MO St Louis Sex Offender,MS Hinds,MS DOC,MS Sex Offender,MT DOC,MT Sex Offender,NC AOC,NC Archived DOC,NC DOC,NC Sex Offender,NC Sex Offender,ND AOC,ND Sex Offender,ND Sex Offender,NE DOC,NE Sex Offender,NH DOC,NH Sex Offender,NJ AOC,NJ DOC,NJ Archive DOC,NJ Sex Offender,NM DOC,NM Sex Offender,NV Archive DOC,NV DOC,NV Sex Offender,NY DOC,NY Sex Offender,AppAlert Federal Criminal Data,AppAlert OFAC,OH Portage,OH Greene,OH DOC,OH Sex Offender,OK DOC,OK AOC,OK Sex Offender,OR DOC,OR AOC,OR Sex Offender,PA DOC,PA Supplemental Courts,PA Traffic,PA AOC,PA Sex Offender,Proprietary Offender Data,RI Judicial Technology Center,RI Sex Offender,SC DOC,SC Sex Offender,SD Sex Offender,SD Aberdeen Sex Offender,SD Sioux Falls Sex Offender,TN DOC,TN Davidson Sheriff,TN AOC,TN Nashville,TN AOC,TN Sex Offender,TX Bexar Felony,TX Bexar Misdemeanor,TX Travis Misdemeanor,TX Travis Felony,TX Ft Bend Felony,TX Ft Bend Misdemeanor,TX Montgomery,TX Potter Misdemeanor,TX Potter Felony,TX Denton,TX El Paso,TX Harris Felonies,TX Harris Misdemeanor,TX Dallas,TX Gregg,TX Jefferson,TX Victoria,TX Dept of Public Safety,TX Sex Offender,UT DOC,UT AOC,UT Sex Offender,VA Circuit,VA General District,VA Fairfax,VA Traffic,VA Sex Offender,VT Sex Offender,WA DOC,WA Courts of Ltd Jurisdiction,WA AOC SCOMIS,WA Sex Offender,WI DOC,WI AOC,WI Sex Offender,WV Sex Offender,WY Sex Offender

FILE# 75270 : VARAD, CHRISTINE

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CAUTION: Based On The Information Provided We Searched Our Database For The Above Mentioned Jurisdiction(s) For Criminal Convictions And Found No Individual By This Identification. This Means That No One By This Identification Is Within Our Database As Convicted Of A Criminal Charge For These Jurisdiction(s). Therefore It Cannot Be Confirmed That The Applicant Has Not Ever Been Convicted Of A Criminal Charge. Further Investigation May Be Warranted. Call For Assistance!

SOCIAL SECURITY SEARCH

SOCIAL SECURITY SEARCH [# 092590]

Record # 01

Name CHRISTINE M VARAD
 SSN 013-42-9612
 Address 88 GREENFIELD LN , SCITUATE, MA 02066 08,01,1993
 Remark REQUESTED PRODUCT DELIVERED
 SSN issued from 1966 to 1968; State: MA (input)
 SSN issued from 1966 to 1968; State: MA (file)
 INPUT SSN ISSUED: 1966 - 1968; STATE: MA
 FILE SSN ISSUED: 1966 - 1968; STATE: MA

REFERRAL

Reporting Bureau(s) Trans Union
 P.O. Box 1000
 Chester, PA 19022
 800-888-4213

DISCLOSURE

The Information Contained In This Social Security Reports Section Should Only Be Used As A Tool To Further Research And Verifications. Please Call For Assistance.

REPOSITORIES

ADDRESS SOURCE MANAGER

RESULTS RECORDS FOUND

SSN SEARCHED 013-42-9612

FULL NAME / SSN	AGE / DOB	ADDRESS	DATES	PHONE INFORMATION
CHRISTINE VARAD 013-42-xxxx		PO BOX 583 MILTON, MA 02186	Sep 05 - Dec 05	
CHRISTINE M VARAD 013-42-xxxx	50 Apr 30, 1955	88 GREENFIELD LN SCITUATE, MA 02066	Jun 89 - Aug 05	(781) 545- 0707
CHRISTINE VARAD 013-42-xxxx	50 Apr 30, 1955	CNS # 18027 SIOUX FALLS, SD 57117	Jun 92 - Jun 92	
CHRISTINE VARAD		CNS 18027	Jun 92 - Jun	

FILE# 75270 : VARAD, CHRISTINE

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013-42-xxxx	SIOUX FALLS, SD 57117	92
CHRISTINE MOONEY	88 GREENFIELD LN	Dec 87 - Dec
013-42-xxxx	SCITUATE, MA 02066	91
CHRISTINE MOONE	88 GREENFIELD LN	Jul 87 - Dec
013-42-xxxx	SCITUATE, MA 02066	90

Social Security Number 013-42-xxxx

Location Massachusetts

Dates issued Jan 01, 1966 - Dec 31, 1968

WARNING: This search may not be used as the basis for an adverse action on an applicant. It should only be used to verify or correct an applicant's information, or as a tool to further research of public records or other verifications.

DISCLAIMER

Information Contained Here In Meets All The Guidelines Set Forth By The Fair Credit Reporting Act. This Is Confidential Information And Not To Be Divulged Except As Required By Public P=Law P=91-508, 93-579, 94-239. This Report Is Furnished In Response To An Inquiry For The Purpose Of Determining The Propriety Of Dealing With The Consumer. It Is Based Upon Information Obtained In Good Faith From Sources Deemed Reliable.

***** END OF REPORT *****



APPLICANT SCREENING REPORT

8555 N DIXIE DR * DAYTON, OH 45414
PHONE 937-264-4900 * 800-759-4255
FAX 937-264-4909 * 800-765-7393

FILE #	75270 / ES1165	REPORT DATE	02/06/2006	AMANDA MEYERS
REPORT TO	F&W PUBLICATIONS ES1165	DATE ORDERED	02/01/2006	AMY BREWER
STREET	4700 E GALBRATH	REPOSITORIES		
CITY/ST/ZIP		TYPE	F&W PUBLICATIONS	

APPLICANT INFORMATION

APPLICANT	VARAD, CHRISTINE M	SOC SEC	013-42-9612	DOB	04/30/1955
ADDRESS	88 GREENFIELD LN	CITY/ST/ZIP	SCITATE, MA 02066		

INVESTIGATIVE

COUNTY CRIMINAL RECORDS SEARCH

RESULTS NO REPORTABLE RECORDS FOUND

NAME(S) SEARCHED VARAD, CHRISTINE M

ALTERNATIVE IDENTIFIERS MOONEY, CHRISTINE

DOB(S) SEARCHED 04/30/1955

JURISDICTION(S) MA-PLYMOUTH

CAUTION: Based On The Information Provided We Searched The Above Mentioned Jurisdiction(s) For Criminal Convictions For No Less Than Ten Years Unless Specified And Found No Individual By This Identification. This Means That No One By This Identification Has Been Found As Convicted Of A Criminal Charge In These Jurisdiction (s). Further Investigation Into Additional Jurisdictions May Be Warranted. Please Call For Assistance.

RESULTS NO REPORTABLE RECORDS FOUND

NAME(S) SEARCHED VARAD, CHRISTINE M

ALTERNATIVE IDENTIFIERS MOONEY, CHRISTINE

DOB(S) SEARCHED 04/30/1955

JURISDICTION(S) MA-NORFOLK

CAUTION: Based On The Information Provided We Searched The Above Mentioned Jurisdiction(s) For Criminal Convictions For No Less Than Ten Years Unless Specified And Found No Individual By This Identification. This Means That No One By This Identification Has Been Found As Convicted Of A Criminal Charge In These Jurisdiction (s). Further Investigation Into Additional Jurisdictions May Be Warranted. Please Call For Assistance.

INSTACRIMINAL NATIONAL (MULTISTATE) SEARCH

FILE# 75270 : VARAD, CHRISTINE

Page 2 of 4

RESULTS NO REPORTABLE RECORDS FOUND

NAME(S) SEARCHED CHRISTINE VARAD

DOB SEARCHED 04/30/1955

JURISDICTION(S) SEARCHED AK AOC,AK Sex Offender,AL DOC,AL Sex Offender,AR AOC,AR DOC,AR Sex Offender,AZ Maricopa Superior Archive,AZ Maricopa Felony,AZ Maricopa Misdemeanor,AZ AOC,AZ Pima,AZ Mohave,AZ DOC,AZ Maricopa Superior,AZ Sex Offender,CA Fresno Index,CA Orange,CA Sacramento,CA Riverside,CA Los Angeles,CA Santa Clara,CA San Bernardino,CA Santa Barbara,CA Santa Cruz,CA Alameda,CA Butte,CA Contra Costa Municipal,CA Contra Costa Superior,CA Fresno,CA Indio,CA Marin Municipal,CA Marin Superior,CA San Diego Municipal,CA San Diego Superior,CA San Luis Obispo,CA Santa Clara Municipal,CA Ventura,CA San Mateo,CA Sex Offender,CO Archived Sex Offender,CO Sex Offender,CT Judicial Information System,CT DOC,CT Traffic,CT Sex Offender,CT Out of State Sex Offender,DC DOC,DC Sex Offender,DE Sex Offender,FL Pinellas,FL DOC,FL AOC,FL Osceola,FL Miami Dade,FL Brevard,FL Charlotte,FL Orange,FL Bay,FL Duval,FL Hillsborough,FL Palm Beach,FL Hernando,FL Indian River,FL Lee,FL Pasco,FL Suwannee,FL Monroe,FL Highlands,FL Alachua,FL Broward,FL Sex Offender,GA DOC,GA Bureau of Investigations,GA Decatur Arrest Records,GA Sex Offender,HI Sex Offender,IA DOC,IA AOC,IA Sex Offender,ID DOC,ID Sex Offender,IL DOC,IL Cook,IL Sangamon,IL Peoria,IL Sex Offender,IN DOC,IN Sex Offender,KS DOC,KS Sedgwick,KS Sedgwick Archive,KS Sex Offender,KY DOC,KY Lexington Fayette,KY Sex Offender,LA Sex Offender,MA Sex Offender,MD DOC,MD Sex Offender,ME DOC,ME Sex Offender,MI DOC,MI OTIS,MI Wayne,MI Sex Offender,MN DOC,MN DPS,MN Sex Offender,MO DOC,MO Sex Offender,MO Cape Girard Sex Offender,MO Cole Sex Offender,MO Barton Sex Offender,MO Jefferson Sex Offender,MO Newton Sex Offender,MO Laclede Sex Offender,MO St Louis Sex Offender,MS Hinds,MS DOC,MS Sex Offender,MT DOC,MT Sex Offender,NC AOC,NC Archived DOC,NC DOC,NC Sex Offender,NC Sex Offender,ND AOC,ND Sex Offender,ND Sex Offender,NE DOC,NE Sex Offender,NH DOC,NH Sex Offender,NJ AOC,NJ DOC,NJ Archive DOC,NJ Sex Offender,NM DOC,NM Sex Offender,NV Archive DOC,NV DOC,NV Sex Offender,NY DOC,NY Sex Offender,AppAlert Federal Criminal Data,AppAlert OFAC,OH Portage,OH Greene,OH DOC,OH Sex Offender,OK DOC,OK AOC,OK Sex Offender,OR DOC,OR AOC,OR Sex Offender,PA DOC,PA Supplemental Courts,PA Traffic,PA AOC,PA Sex Offender,Proprietary Offender Data,RI Judicial Technology Center,RI Sex Offender,SC DOC,SC Sex Offender,SD Sex Offender,SD Aberdeen Sex Offender,SD Sioux Falls Sex Offender,TN DOC,TN Davidson Sheriff,TN AOC,TN Nashville,TN AOC,TN Sex Offender,TX Bexar Felony,TX Bexar Misdemeanor,TX Travis Misdemeanor,TX Travis Felony,TX Ft Bend Felony,TX Ft Bend Misdemeanor,TX Montgomery,TX Potter Misdemeanor,TX Potter Felony,TX Denton,TX El Paso,TX Harris Felonies,TX Harris Misdemeanor,TX Dallas,TX Gregg,TX Jefferson,TX Victoria,TX Dept of Public Safety,TX Sex Offender,UT DOC,UT AOC,UT Sex Offender,VA Circuit,VA General District,VA Fairfax,VA Traffic,VA Sex Offender,VT Sex Offender,WA DOC,WA Courts of Ltd Jurisdiction,WA AOC SCOMIS,WA Sex Offender,WI DOC,WI AOC,WI Sex Offender,WV Sex Offender,WY Sex Offender

FILE# 75270 : VARAD, CHRISTINE

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CAUTION: Based On The Information Provided We Searched Our Database For The Above Mentioned Jurisdiction(s) For Criminal Convictions And Found No Individual By This Identification. This Means That No One By This Identification Is Within Our Database As Convicted Of A Criminal Charge For These Jurisdiction(s). Therefore It Cannot Be Confirmed That The Applicant Has Not Ever Been Convicted Of A Criminal Charge. Further Investigation May Be Warranted. Call For Assistance!

SOCIAL SECURITY SEARCH

SOCIAL SECURITY SEARCH [# 092590]

Record #01

Name CHRISTINE M VARAD
 SSN 013-42-9612
 Address 88 GREENFIELD LN , SCITUATE, MA 02066 08/01/1993
 HAWK REQUESTED PRODUCT DELIVERED
 SSN issued from 1966 to 1968; State: MA (input)
 SSN issued from 1966 to 1968; State: MA (file)
 INPUT SSN ISSUED: 1966 - 1968; STATE: MA
 FILE SSN ISSUED: 1966 - 1968; STATE: MA

REFERRAL

Reporting Bureau(s) Trans Union
 P.O. Box 1000
 Chester, PA 19022
 800-888-4213

DISCLOSURE

The Information Contained In This Social Security Reports Section Should Only Be Used As A Tool To Further Research And Verifications. Please Call For Assistance.

REPOSITORIES

ADDRESS SOURCE MANAGER

RESULTS RECORDS FOUND

SSN SEARCHED 013-42-9612

FULL NAME / SSN	AGE / DOB	ADDRESS	DATES	PHONE INFORMATION
CHRISTINE VARAD 013-42-xxxx		PO BOX 583 MILTON, MA 02186	Sep 05 - Dec 05	
CHRISTINE M VARAD 013-42-xxxx	50 Apr 30, 1955	88 GREENFIELD LN SCITUATE, MA 02066	Jun 89 - Aug 05	(781) 545- 0707
CHRISTINE VARAD 013-42-xxxx	50 Apr 30, 1955	CNS # 18027 SIOUX FALLS, SD 57117	Jun 92 - Jun 92	
CHRISTINE VARAD		CNS 18027	Jun 92 - Jun	

FILE# 75270 : VARAD, CHRISTINE

Page 4 of 4

013-42-xxxx	SIOUX FALLS, SD 57117	92
CHRISTINE MOONEY	88 GREENFIELD LN	Dec 87 - Dec
013-42-xxxx	SCITUATE, MA 02066	91
CHRISTINE MOONE	88 GREENFIELD LN	Jul 87 - Dec
013-42-xxxx	SCITUATE, MA 02066	90

Social Security Number 013-42-xxxx

Location Massachusetts

Dates Issued Jan 01, 1966 - Dec 31, 1968

WARNING: This search may not be used as the basis for an adverse action on an applicant. It should only be used to verify or correct an applicant's information, or as a tool to further research of public records or other verifications.

DISCLAIMER

Information Contained Here In Meets All The Guidelines Set Forth By The Fair Credit Reporting Act. This Is Confidential Information And Not To Be Divulged Except As Required By Public P=Law P=91-508, 93-579, 94-239. This Report Is Furnished In Response To An Inquiry For The Purpose Of Determining The Propriety Of Dealing With The Consumer. It Is Based Upon Information Obtained In Good Faith From Sources Deemed Reliable.

*** END OF REPORT ***

most



GALL & GALL COMPANY, INC.

APPLICANT SCREENING REPORT

8555 N DIXIE DR * DAYTON, OH 45414
PHONE 937-264-4900 * 800-759-4255
FAX 937-264-4909 * 800-765-7393

FILE#	75270 / ES1165	REPORT DATE	04/05/2006	AMANDA MEYERS
REPORT TO	F&W PUBLICATIONS ES1165	DATE ORDERED	02/01/2006	AMY BREWER
STREET	4700 E GALBRATH	REPOSITORIES		
CITY/ST/ZIP	CINCINNATI, OH 45236	TYPE	F&W PUBLICATIONS	

APPLICANT INFORMATION

APPLICANT	VARAD, CHRISTINE M	SOC SEC	013-42-9612	DOB	04/30/1955
ADDRESS	88 GREENFIELD LN	CITY/ST/ZIP	SCITATE, MA 02066		

INVESTIGATIVE

COUNTY CRIMINAL RECORDS SEARCH

RESULTS NO REPORTABLE RECORDS FOUND

NAME(S) SEARCHED VARAD, CHRISTINE M

DOB(S) SEARCHED 04/30/1955

JURISDICTION(S) MA-PLYMOUTH

CAUTION: Based On The Information Provided We Searched The Above Mentioned Jurisdiction(s) For Criminal Convictions For No Less Than Ten Years Unless Specified And Found No Individual By This Identification. This Means That No One By This Identification Has Been Found As Convicted Of A Criminal Charge In These Jurisdiction (s). Further Investigation Into Additional Jurisdictions May Be Warranted. Please Call For Assistance.

RESULTS NO REPORTABLE RECORDS FOUND

NAME(S) SEARCHED VARAD, CHRISTINE M

DOB(S) SEARCHED 04/30/1955

JURISDICTION(S) MA-NORFOLK

CAUTION: Based On The Information Provided We Searched The Above Mentioned Jurisdiction(s) For Criminal Convictions For No Less Than Ten Years Unless Specified And Found No Individual By This Identification. This Means That No One By This Identification Has Been Found As Convicted Of A Criminal Charge In These Jurisdiction (s). Further Investigation Into Additional Jurisdictions May Be Warranted. Please Call For Assistance.

INSTACRIMINAL NATIONAL (MULTISTATE) SEARCH

RESULTS NO REPORTABLE RECORDS FOUND

NAME(S) SEARCHED CHRISTINE VARAD

FILE# 15270 : VARAD, CHRISTINE

Page 2 of 3

DOB SEARCHED 04/30/1955

JURISDICTION(S) SEARCHED AK AOC,AK Sex Offender,AL DOC,AL Sex Offender,AR AOC,AR DOC,AR Sex Offender,AZ Maricopa Superior Archive,AZ Maricopa Felony,AZ Maricopa Misdemeanor,AZ AOC,AZ Mohave,AZ DOC,AZ Maricopa Superior,CA Orange,CA Riverside,CA Santa Clara,CA San Bernardino,CA Santa Cruz,CA Fresno,CA Indio,CA Santa Clara Municipal,CA Sex Offender,CO Archived Sex Offender,CO Sex Offender,CT Judicial Information System,CT DOC,CT Traffic,CT Sex Offender,CT Out of State Sex Offender,DC DOC,DC Sex Offender,DE Sex Offender,FL Pinellas,FL DOC,FL AOC,FL Osceola,FL Miami Dade,FL Brevard,FL Charlotte,FL Orange,FL Bay,FL Duval,FL Hillsborough,FL Palm Beach,FL Hernando,FL Indian River,FL Lee,FL Pasco,FL Suwannee,FL Monroe,FL Highlands,FL Alachua,FL Broward,FL Sex Offender,GA Decatur Arrest Records,IA DOC,IA AOC,IA Sex Offender,ID DOC,ID Sex Offender,IL DOC,IL Cook,IL Sangamon,IL Peoria,IL Sex Offender,KS DOC, Archive,KS Sex Offender,KY DOC,KY Lexington Fayette,KY Sex Offender,MD DOC,ME DOC,ME Sex Offender,MI DOC,MI OTIS,MI Wayne,MI Sex Offender,MN DOC,MN DPS,MN Sex Offender,MO DOC,MO Cape Girard Sex Offender,MO Cole Sex Offender,MO Barton Sex Offender,MO Jefferson Sex Offender,MO Newton Sex Offender,MO Laclede Sex Offender,MO St Louis Sex Offender,MS Hinds,MS DOC,MS Sex Offender,MT DOC,NC AOC,NC Archived DOC,NC DOC,NC Sex Offender,NC Sex Offender,ND AOC,ND Sex Offender,ND Sex Offender,NE DOC,NE Sex Offender,NH Sex Offender,NJ AOC,NJ DOC,NJ Archive DOC,NJ Sex Offender,NM DOC,NM Sex Offender,NV Archive DOC,NY DOC,NY Sex Offender,AppAlert Federal Criminal Data,AppAlert OFAC,OH Portage,OH Greene,OH DOC,OH Sex Offender,OK DOC,OK AOC,OR DOC,OR AOC,PA DOC,Proprietary Offender Data,RI Sex Offender,SC DOC,SC Sex Offender,SD Sex Offender,SD Aberdeen Sex Offender,SD Sioux Falls Sex Offender,TN Davidson Sheriff,TN Sex Offender,TX Bexar Felony,TX Bexar Misdemeanor,TX Travis Misdemeanor,TX Travis Felony,TX Montgomery,TX Potter Misdemeanor,TX Potter Felony,TX Denton,TX El Paso,TX Harris Felonies,TX Harris Misdemeanor,TX Dallas,TX Gregg,TX Jefferson,TX Victoria,TX Dept of Public Safety,TX Sex Offender,UT DOC,UT AOC,UT Sex Offender,VA Circuit,VA General District,VA Fairfax,VA Traffic,VT Sex Offender,WA DOC,WA Courts of Ltd Jurisdiction,WA AOC SCOMIS,WI DOC,WI AOC,WV Sex Offender,WY Sex Offender

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SOCIAL SECURITY SEARCH

SOCIAL SECURITY SEARCH [# 092590]

Record # 01
 Name CHRISTINE M VARAD
 SSN 013-42-9612
 Address 88 GREENFIELD LN , SCITUATE, MA 02066 08/01/1993
 HAWK REQUESTED PRODUCT DELIVERED

SSN issued from 1966 to 1968; State: MA (input)

SSN issued from 1966 to 1968; State: MA (file)

INPUT SSN ISSUED: 1966 - 1968; STATE: MA

FILE SSN ISSUED: 1966 - 1968; STATE: MA

REFERRAL

Reporting Bureau(s) Trans Union
 P.O. Box 1000
 Chester, PA 19022
 800-888-4213

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REPOSITORIES

ADDRESS SOURCE MANAGER

RESULTS RECORDS FOUND

SSN SEARCHED 013-42-9612

FULL NAME / SSN	AGE / DOB	ADDRESS	DATES	PHONE INFORMATION
CHRISTINE M VARAD 013-42-xxxx	50 Apr 30, 1955	88 GREENFIELD LN SCITUATE, MA 02066	Jun 89 - Aug 05	(781) 545- 0707

Social Security Number 013-42-xxxx

Location Massachusetts

Dates Issued Jan 01, 1966 - Dec 31, 1968

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*** END OF REPORT ***