

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

ZIV GAL,)
)
Plaintiff,) Civil Action File No.: **2019CV322232**
)
v.)
)
LEXISNEXIS RISK SOLUTIONS INC.,)
)
Defendant.)

VERIFIED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

COMES NOW, Ziv Gal, by and through his undersigned counsel, and states his Complaint against Defendant LexisNexis Risk Solutions Inc. ("Lexis"), showing this Honorable Court as follows:

INTRODUCTION

1. This action arises out of false accusations of criminal conduct published by Lexis to third parties against Plaintiff Ziv Gal ("Mr. Gal") via two separate background reports from its Bridger Insight platform (the "Background Check(s)").
2. In response to multiple requests and demands, formal and informal, Lexis has steadfastly refused for ten (10) months to issue a retraction for its false and defamatory accusations as well as to take any steps to disassociate Mr. Gal from the false criminal records reported in the Background Checks in order to ensure the defamatory remarks are not disseminated again in the future, forcing Mr. Gal to seek redress in this Court.
3. Mr. Gal seeks a permanent injunction requiring Lexis to take the affirmative steps necessary to retract its false accusations of conduct and to disassociate Mr. Gal from such false

records in order to prevent their republication, as well as damages and attorneys' fees for Lexis's defamatory statements and stubborn refusal to redress this matter without a court order.

PARTIES, JURISDICTION, AND VENUE

4. Mr. Gal is a resident of Fulton County, Georgia, and the CEO of a local construction business, MGS Contracting Inc. who does business in Fulton County and elsewhere.

5. Lexis is a domestic corporation with its principal office address located at 1000 Alderman Dr., Alpharetta, GA 30005, and may be served with process through its duly appointed registered agent, same being C T Corporation System, 289 S. Culver St., Lawrenceville, GA 30046.

6. As residents of Fulton County, Georgia, this Court has personal jurisdiction over Defendants pursuant to Georgia law, including but not limited to O.C.G.A. § 9-10-30.

7. Venue is proper in this Court because, *inter alia*, Lexis is a resident of Fulton County, Lexis does business in Fulton County, and the wrongdoing and injury alleged herein occurred in Fulton County.

8. Venue is proper in this Court pursuant to Georgia law, including but not limited to Ga. Const. Art. 6, § 2, ¶ 6, O.C.G.A. § 9-10-30, and O.C.G.A. § 14-2-510(3).

9. The Court has subject matter jurisdiction over this action pursuant to Georgia law, including O.C.G.A. § 23-1-1.

FACTUAL BACKGROUND

10. On June 13, 2018, and July 9, 2018, Lexis published to a third-party, Aegis Fiduciary Services, LLC ("Aegis"), and its employee(s) two Background Checks on its Bridger Insight platform purporting to identify Mr. Gal. True and correct of the June 13 and July 9 Background Check reports are attached hereto as Exhibit A and B, respectively.

11. Upon information and belief, Lexis published additional Bridger Insight reports containing the same information to Aegis or others, but Mr. Gal does not have access to those records at this time.

12. Aegis pulled the Background Checks as part of its due diligence in connection with acting as the fiduciary to MGS Contracting in its planned Employee Stock Option Purchase Plan (“ESOP”).

13. Prior to completing the ESOP, Mr. Gal was the majority shareholder.

14. Lexis claims that it “and Bridger Insight are the industry leaders in OFAC, Bank Secrecy Act, and USA PATRIOT Act compliance solutions” and that “[t]he tools they offer should be an integral part of any organization’s anti-terrorism and money laundering compliance program.” *See* <https://risk.lexisnexis.com/products/bridger-insight-xg> (last visited May 13, 2019).

15. According to Lexis, Bridger Insight reports do “not constitute a ‘consumer report’ as that term is defined in the federal Fair Credit Reporting Act, 15 USC 1681 etc.” (the “FCRA”). *See id.*

16. For the purposes of this Complaint and subject to discovery, Mr. Gal accepts as true Lexis’s representation that the FCRA does not pre-empt this state law action.

17. On the face of the Background Checks, Aegis correctly entered varying personal identifiers of Mr. Gal.

18. In each of the Background Checks, Lexis published the false and defamatory accusation that Mr. Gal was “was ordered to pay ILS 120,000 for smuggling and tax evasion. He was suspected of smuggling diamonds in commercial quantities in 2011. The total price of diamonds was ILS 2,385,676.” *See* Exs. A-B.

19. Mr. Gal is not the individual referenced in the Background Checks and has not engaged at any time in the criminal conduct alleged therein.

20. Mr. Gal has not committed smuggling of any kind, nor tax evasion of any kind, anywhere.

21. Mr. Gal's personal identifying information matched many identifiers associated with this other purported individual, including, e.g., his address, social security number, and birthday.

22. To prove his innocence to Aegis and to Lexis, Mr. Gal sought and obtained a letter from the Israeli SVP Office of Investigations, Intelligence, Drugs and Catches (the "Israeli Confirmation Letter"). A true and correct copy of the Israeli Confirmation Letter is attached hereto as Exhibit C.

23. The Israeli Confirmation Letter, written in Hebrew, states as follows: "This letter is to clarify that the decision regarding Customs and VAT violation settlement payment case number 67/11 is not related to person who's Israeli ID number *****,," same being Mr. Gal.¹

24. No later than July 25, 2018, Mr. Gal's prior counsel politely requested corrective action from Lexis attorneys via telephone, and soon after, via e-mail.

25. Despite assurances, Lexis's attorneys failed to take any action and became non-responsive.

26. On January 4, 2019, the undersigned delivered to Lexis's Consumer Center and Lexis's attorneys a demand for corrective action pursuant to the FCRA as well as a demand for a retraction of the false accusations made to Aegis in the Background Checks. A true and correct copy of said letter is attached hereto as Exhibit D.

¹ Mr. Gal has redacted sensitive personal identifying information in the exhibits attached hereto.

27. The undersigned has received no response to this demand.

28. Having received no response, on February 11, 2019, the undersigned requested via e-mail to the same Lexis attorneys that a response be provided. Though a read receipt was received, no response was provided.

29. On May 15, 2019, the undersigned delivered to the same Lexis attorneys a renewed demand for resolution enclosing a draft of this lawsuit. In response, the undersigned received one voicemail from a Lexis attorney. Despite repeated attempts to reach this individual prior to filing this instant action, no further communication of any kind has been received by the undersigned.

30. On January 16, 2019, Mr. Gal made a full file disclosure request pursuant to the FCRA to Lexis, “specifically including any report issued via the LexisNexis Bridger Insight XG platform.”

31. On or around January 18, 2019, Mr. Gal received Lexis’s automated response to his request. The response indicated that Lexis had “received your Full File Disclosure and Bridger request” and stated that the “report is being sent in the mail and should arrive within 7-10 business days.” A true and correct copy of this correspondence is attached hereto as Exhibit E.

32. The documents and reports received from Lexis did not contain any information pertaining to the Bridger Insight platform or the Background Checks.

33. Lexis never implicitly or explicitly acknowledged its false and defamatory Background Checks, and never advised Mr. Gal whether Lexis took any steps to disassociate Mr. Gal from the criminal records shown in the Background Checks.

34. Because Lexis claims that Bridger Insight reports are not governed by the FCRA, it does not invest the money or resources necessary to ensure compliance with the FCRA, including an opportunity for consumers to object to false reports and to have false information corrected.

35. The Background Checks caused consternation with Aegis regarding acting as fiduciary, caused a delay in completing the transaction, and the transaction was only completed upon Mr. Gal obtaining the Israeli Confirmation Letter.

CAUSES OF ACTION

COUNT ONE **PERMANENT INJUNCTION**

36. Mr. Gal incorporates and re-alleges as if restated fully herein paragraphs 1 through 35 of this Complaint.

37. Lexis has published false and defamatory criminal accusations against Mr. Gal and has refused to take any corrective action.

38. If Lexis fails to take corrective action, Lexis is likely to republish the same false and defamatory accusations in the future – including the possibility that such accusations may be contained in background reports other than Bridger Insight – and irreparable injury to Mr. Gal is likely to result.

39. The failure to take corrective action under threat that the defamation will be published again is contrary to equity and good conscience.

40. Without the imposition of a permanent injunction, Mr. Gal will be irreparably harmed each time Lexis publishes the false and defamatory criminal accusations contained in the Bridger Insight Background Checks.

41. Lexis will not suffer any harm if required to ensure accuracy of future background reports regarding Mr. Gal. It derives no value from lodging false and defamatory accusations against consumers.

42. The proposed injunction would serve the public interest, including by encouraging Lexis to ensure accuracy of its background reports and by allowing consumers a right to redress false reports.

43. There exists a real and justiciable controversy between the parties.

44. Accordingly, Mr. Gal seeks the entry of a permanent injunction requiring Lexis, upon a order finding falsity, to (1) issue a conspicuous retraction to Aegis and (2) take all reasonable measures necessary to ensure that Mr. Gal is no longer falsely associated with the false and defamatory accusations made against him in the Background Checks.

45. Lexis has acted in bad faith, been stubbornly litigious, and caused Mr. Gal unnecessary trouble and expense within the meaning of O.C.G.A. § 13-6-11 such that Mr. Gal is entitled to an award of attorneys' fees and costs incurred in the prosecution of this action.

COUNT TWO

DEFAMATION

46. Plaintiffs incorporate and re-allege as if restated fully herein paragraphs 1 through 45 of this Complaint.

47. Lexis published to third parties without privilege the false and defamatory Background Checks falsely accusing Mr. Gal of diamond smuggling and tax evasion.

48. Mr. Gal has never engaged in diamond smuggling or tax evasion.

49. Lexis's false and defamatory accusations are of a purely commercial, private nature made in a private setting and do not implicate the First Amendment in any manner.

50. Lexis is expressly aware that “[d]ue to the nature and origin of public record information, the public records and commercially available data sources used in reports may contain errors.” *See, e.g.,* <https://risk.lexisnexis.com/products/bridger-insight-xg> (last visited May 13, 2019).

51. Lexis acted with the requisite level of fault, including negligence, by publishing the Background Checks despite having knowledge that its Bridger Insight reports may contain errors.

52. Lexis acted with the requisite level of fault, including negligence, by publishing the Background Checks without conducting any investigation into the error-prone public records contained in the Background Checks.

53. Lexis acted with the requisite level of fault, including negligence, by failing to advise Mr. Gal of the existence of the false and defamatory information in the Background Checks and providing Mr. Gal an opportunity to object.

54. Lexis acted with the requisite level of fault, including negligence, by failing to institute reasonable procedures to ensure accuracy of the Bridger Insight reports prior to publication, despite the obvious risk to consumers that such reports will contain false and damaging information.

55. Lexis acted with the requisite degree of fault, including negligence, by failing to institute reasonable procedures permitting consumers to correct false and damaging information contained in Bridger Insight reports.

56. Accusations of criminal conduct such as diamond smuggling and tax evasion are false and defamatory *per se*, and damages to Mr. Gal’s reputation are therefore presumed.

57. The false accusations against Mr. Gal damaged him in his professional capacity and are therefore defamatory per se and damages to Mr. Gal's reputation are therefore presumed.

58. As a direct and proximate result of Lexis's misconduct, Mr. Gal suffered humiliation, distress, expense, and a delay in completing the ESOP transaction.

59. Lexis has acted in bad faith, been stubbornly litigious, and caused Mr. Gal unnecessary trouble and expense within the meaning of O.C.G.A. § 13-6-11 such that Mr. Gal is entitled to an award of attorneys' fees and costs incurred in the prosecution of this action.

WHEREFORE, Mr. Gal respectfully prays for the following relief:

- (a) That a summons be issued against Lexis as provided by law;
- (b) That an injunction issue against Lexis as requested herein;
- (c) That Lexis be held liable for compensatory damages in an amount to be proven at trial;
- (d) That Lexis be ordered to pay Mr. Gal's attorney's fees and expenses of litigation; and
- (e) For all such other and further relief as this Honorable Court deems just and proper under the circumstances.

Respectfully submitted this 11th day of June, 2019.

L. LIN WOOD, P.C.

/s/ G. Taylor Wilson

G. Taylor Wilson

State Bar No. 460781

twilson@linwoodlaw.com

1180 West Peachtree Street

Suite 2400

Atlanta, Georgia 30309

404-891-1402


404-506-9111 (fax)

Counsel for Plaintiff

STATE OF GEORGIA
COUNTY OF Fulton

VERIFICATION

Before the undersigned officer duly authorized to administer oaths, personally comes Ziv Gal who, being first duly sworn, deposes and says that the facts contained in the foregoing VERIFIED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF are true and correct according to the best of his knowledge, information, and ability.


Ziv Gal

Sworn to and subscribed before me
this 10 day of JUNE, 2019.

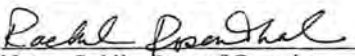

Notary Public, State of Georgia
My Commission Expires: 9.27.22



EXHIBIT A

EXHIBIT A

Wednesday, June 13, 2018
Created By: Ellen

Aegis Fiduciary Services, LLC

Ziv Gal
Current Address [REDACTED] SSN [REDACTED] Current Status None Alert ID: 1170302721
Division Default division DOB [REDACTED] 1966 Assigned to Ellen
Account ID [REDACTED] Alert State Open

Screening Lists

Score	Entity Name	Best Match	File	Source Date
85	Ziv Or Gil	Or Gil, Ziv	WorldCompliance - Enforcement	6/11/2018
85	Ziv Or Gil	Or Gil, Ziv	WorldCompliance - Full	6/11/2018

Aegis Fiduciary Services, LLC

Created By: Ellen

Name:	Ziv Gal	Alert ID:	1170302721	Assigned to:	Ellen
SSN:	[REDACTED]	Origin:	RealTime	Record Status:	None
DOB:	1966	Search Date:	6/13/2018	Updated By:	
Phone:	[REDACTED]	Search Time:	11:54 AM	Alert State:	Open
Account ID:	[REDACTED]	Division:	Default division	Updated By:	
Address:	[REDACTED]	Searched By:	Ellen		

1. Ziv Or Gil

Score: 85 - WorldCompliance® - Enforcement

Source Date: 6/11/2018
 Entity Type: Individual
 Gender: Male
 Number: 7671125
 Entity Date: 11/24/2016
 Reason Listed: Enforcement:Smuggling

Match Summary	
Input Information	Source Information
Name: Ziv Gal	Ziv Or Gil

Comments: Source: Israel,IL-Israel Tax Authority || Offense: Ordered to pay ILS 120,000 for smuggling and tax evasion - 2011 || Category: Enforcement | Subcategory: Smuggling || Last updated: 2016-11-25 || Profile Notes: According to the Israel Tax Authority; 2011: Ziv Or Gil was ordered to pay ILS 120,000 for smuggling and tax evasion. He was suspected of smuggling diamonds in commercial quantities in 2011. The total price of diamonds was ILS 2,385,676.

AKAs

AKA זיו אור גיל

IDs

Proprietary UID: 7671125

Addresses

Address:

Country: Israel

Additional Information

Other Information: Link to WorldCompliance Online Database

Comments: Or Gil, Ziv
<https://members.worldcompliance.com/metawatch2.aspx?id=f9718da6-6bc5-4299-af69-8d204e7c6e4a>

Other Information: Sources of Record Information

Comments: <http://www.news1.co.il/Archive/0019-D-79798-00.html>
<https://taxes.gov.il/EnforcementAndDeterrence/Pages/EnforcementKoffer.aspx>
https://taxes.gov.il/enforcementanddeterrence/documents/vaadatkoffer/hahlatot_kofer2011b.pdf

2. Ziv Or Gil

Score: 85 - WorldCompliance® - Full

Source Date: 6/11/2018
 Entity Type: Individual
 Gender: Male
 Number: 7671125
 Entity Date: 11/24/2016
 Reason Listed: Enforcement:Smuggling

Match Summary	
Input Information	Source Information
Name: Ziv Gal	Ziv Or Gil

Comments: Source: Israel,IL-Israel Tax Authority || Offense: Ordered to pay ILS 120,000 for smuggling and tax evasion - 2011 || Category: Enforcement | Subcategory: Smuggling || Last updated: 2016-11-25 || Profile Notes: According to the Israel Tax Authority; 2011: Ziv Or Gil was ordered to pay ILS 120,000

for smuggling and tax evasion. He was suspected of smuggling diamonds in commercial quantities in 2011. The total price of diamonds was ILS 2,385,676.

AKAs

AKA דיו אור גיל

IDs

Proprietary UID: 7671125

Addresses

Address:

Country: Israel

Additional Information

Other Information: Link to WorldCompliance Online Database

Comments Or Gil, Ziv
<https://members.worldcompliance.com/metawatch2.aspx?id=f9718da6-6bc5-4299-af69-8d204e7c6e4a>

Other Information: Sources of Record Information

Comments <http://www.news1.co.il/Archive/0019-D-79798-00.html>
<https://taxes.gov.il/EnforcementAndDeterrence/Pages/EnforcementKoffer.aspx>
https://taxes.gov.il/enforcementanddeterrence/documents/vaadatkoffer/hahlatot_kofer2011b.pdf

EXHIBIT B

EXHIBIT B

Aegis Fiduciary Services, LLC

Monday, July 09, 2018
Created By: Ellen

Ziv Gal				Alert ID: 1226034711
Current Address	[REDACTED]	SSN	Current Status	None
Division	Default division	DOB	Assigned to	Ellen
		Account ID	Alert State	Open

Screening Lists

Score	Entity Name	Best Match	File	Source Date
90	Gal Ziv	Ziv, Gal	WorldCompliance - Full	7/5/2018
85	Ziv Or Gil	Or Gil, Ziv	WorldCompliance - Enforcement	7/5/2018
85	Ziv Or Gil	Or Gil, Ziv	WorldCompliance - Full	7/5/2018

Monday, July 09, 2018

Created By: Ellen

Aegis Fiduciary Services, LLC

Name Ziv Gal Alert ID: 1226034711

Date & Time	User Name	Event	Note
7/9/2018 4:39:16 PM	Ellen	Record Created	Record created from real-time search
7/9/2018 4:39:16 PM	Ellen	Alert Opened	Alert threshold met
7/9/2018 4:39:16 PM	Ellen	List Screening Search Conducted	List Screening Search Conducted

Aegis Fiduciary Services, LLC

Name: Ziv Gal

Alert ID: 1226034711

Alert Information

Current Status: None

Assigned to: Ellen

Alert State: Open

Account Information

Type:

Account Date:

Amount:

Account ID:

Member ID:

Group ID:

Provider ID:

Other Data:

Origin

Real-Time with List Screening on 7/9/2018 at 4:39 PM for Default division

Name

First

Last

Ziv

Gal

Address

Type

Address Line 1

City

State

Postal Code

Current



Aegis Fiduciary Services, LLC

Name:	Ziv Gal	Alert ID:	1226034711	Assigned to:	Ellen
SSN:		Origin:	RealTime	Record Status:	None
DOB:		Search Date:	7/9/2018	Updated By:	
Phone:		Search Time:	4:39 PM	Alert State:	Open
Account ID:		Division:	Default division	Updated By:	
Address:	[REDACTED]	Searched By:	Ellen		

1. Gal Ziv Score: 90 - WorldCompliance® - Full

Source Date:	7/5/2018	Match Summary	
Entity Type:	Individual	Input Information	Source Information
Gender:	Male	Name: Ziv Gal	Gal Ziv
Number:	5259596		
Entity Date:	1/6/2014		
Reason Listed:	National:PEP:Family Member		
Comments	Source: International,Website Level: National Category: PEP Subcategory: Family Member Associations: Mother (PEP:Govt Branch Member): Yachimovich, Shelly, 933024 Last updated: 2016-05-14		

AKAs

AKA זיב גל

IDs

Proprietary UID: 5259596

Addresses

Address:

Country: Israel

Additional Information

Date of Birth: 1992/00/00

Date of Birth: 1991/00/00

Occupation: Son of Shelly Yachimovich, Member of the Knesset

Comments Starting 0 Ending 0

Other Information: Link to WorldCompliance Online Database

Comments Ziv, Gal

<https://members.worldcompliance.com/metawatch2.aspx?id=3c518d42-d9cf-408c-9b4b-4cc2097c5625>

Other Information: Sources of Record Information

Comments <http://www.havoda.org.il/>

<http://www.the7eye.org.il/lexicon/47593>

<http://www.shelly.org.il/about>

<http://forward.com/articles/143667/shelly-yachimovich-started-protesting-at-early-age/>

2. Ziv Or Gil Score: 85 - WorldCompliance® - Enforcement

Source Date:	7/5/2018	Match Summary	
Entity Type:	Individual	Input Information	Source Information
Gender:	Male	Name: Ziv Gal	Ziv Or Gil
Number:	7671125		
Entity Date:	11/24/2016		
Reason Listed:	Enforcement:Smuggling		

Comments Source: Israel,IL-Israel Tax Authority || Offense: Ordered to pay ILS 120,000 for smuggling and tax evasion - 2011 || Category: Enforcement | Subcategory: Smuggling || Last updated: 2016-11-25 || Profile Notes: According to the Israel Tax Authority; 2011: Ziv Or Gil was ordered to pay ILS 120,000 for smuggling and tax evasion. He was suspected of smuggling diamonds in commercial quantities in 2011. The total price of diamonds was ILS 2,385,676.

AKAs

AKA זיו אור גיל

IDs

Proprietary UID: 7671125

Addresses

Address:

Country: Israel

Additional Information

Other Information: Link to WorldCompliance Online Database

Comments Or Gil, Ziv
<https://members.worldcompliance.com/metawatch2.aspx?id=f9718da6-6bc5-4299-af69-8d204e7c6e4a>

Other Information: Sources of Record Information

Comments <http://www.news1.co.il/Archive/0019-D-79798-00.html>
<https://taxes.gov.il/EnforcementAndDeterrence/Pages/EnforcementKoffer.aspx>
https://taxes.gov.il/enforcementanddeterrence/documents/vaadatkoffer/hahlatot_kofer2011b.pdf

3. Ziv Or Gil

Score: 85 - WorldCompliance@ - Full

Source Date: 7/5/2018

Entity Type: Individual


Gender: Male

Number: 7671125

Entity Date: 11/24/2016

Reason Listed: Enforcement:Smuggling

Comments Source: Israel,IL-Israel Tax Authority || Offense: Ordered to pay ILS 120,000 for smuggling and tax evasion - 2011 || Category: Enforcement | Subcategory: Smuggling || Last updated: 2016-11-25 || Profile Notes: According to the Israel Tax Authority; 2011: Ziv Or Gil was ordered to pay ILS 120,000 for smuggling and tax evasion. He was suspected of smuggling diamonds in commercial quantities in 2011. The total price of diamonds was ILS 2,385,676.

Match Summary	
Input Information	Source Information
Name: Ziv Gal	 Ziv Or Gil

AKAs

AKA זיו אור גיל

IDs

Proprietary UID: 7671125

Addresses

Address:

Country: Israel

Additional Information

Other Information: Link to WorldCompliance Online Database

Comments Or Gil, Ziv
<https://members.worldcompliance.com/metawatch2.aspx?id=f9718da6-6bc5-4299-af69-8d204e7c6e4a>

Other Information: Sources of Record Information

Comments <http://www.news1.co.il/Archive/0019-D-79798-00.html>
<https://taxes.gov.il/EnforcementAndDeterrence/Pages/EnforcementKoffer.aspx>
https://taxes.gov.il/enforcementanddeterrence/documents/vaadatkoffer/hahlatot_kofer2011b.pdf

EXHIBIT C

EXHIBIT C



לשכת סמנכ"ל בכיר
לחקירות, מודיעין, סמים ותפישות

תאריך: יט באב תשע"ח
31 ביולי 2018
תיק:
סימוכין:

א.ג.ג.

הנדון: החלטת בופר מכס ומע"מ מס' 67/11.

אברהם להבהיר כי החלטת בופר מכס ומע"מ מספר 67/11, אינה נוגעת לנושא תעודת זהות
מספר 022480248

ב ב ר כ ה ,

אשר מזרחי
מנהל תחום בכיר ותפישות

EXHIBIT D

EXHIBIT D

January 4, 2019

VIA U.S. AND ELECTRONIC MAIL

LexisNexis Consumer Center
PO Box 105108
Atlanta, GA 30348

RE: *Demand for Correction of False and Defamatory Consumer Reports
Regarding Mr. Ziv Gal*

Dear LexisNexis:

This law firm has been retained by Mr. Ziv Gal to obtain redress for multiple defamatory consumer reports of and concerning Mr. Gal falsely accusing him of diamond smuggling and tax evasion. Pursuant to the Fair Credit Report Act, 15 U.S.C. § 1681 *et seq.* (the "FCRA"), I hereby demand that LexisNexis promptly correct Mr. Gal's consumer reports and disassociate Mr. Gal with the true individual referenced in these reports. Further, to permit LexisNexis an opportunity to mitigate the damage it has caused, this letter also demands the immediate retraction of the false accusations made in the reports to all those individuals and/or entities to whom LexisNexis published the reports.

You will find enclosed as Exhibit A true and correct copies of two separate Bridger Insight XG reports dated June 13, 2018 (report ID 1170302721), and July 9, 2018 (report ID 1226034711) (collectively, the "Reports"). As you will note in the Reports, Mr. Gal was identified as having been ordered by the Israeli government to pay a substantial fine for "smuggling diamonds in commercial quantities" and "tax evasion" (collectively, the "False Accusations"). Mr. Gal is not the individual identified in the Reports and has not otherwise engaged in the criminal conduct referenced therein. He has not committed any kind of smuggling or tax evasion and has never dealt with diamonds in any commercial manner. As proof of his innocence of these charges, I am enclosing as Exhibit B true and correct copies of the following: (1) a copy of Mr. Gal's passport page; (2) a copy of Mr. Gal's birth certificate; and (3) a letter from the Israeli SVP Office of Investigations, Intelligence, Drugs and Catches (the "Israeli Government Confirmation Letter").

The Israeli Government Confirmation Letter, written in Hebrew, states as follows: "This letter is to clarify that the decision regarding Customs and VAT violation settlement payment case number 67/11 is not related to person who's Israeli ID number is [REDACTED]." As you will notice in the copy of Mr. Gal's passport, he is the person with Israeli ID number [REDACTED], and hence, is not the individual referenced in the Reports purportedly found guilty of smuggling and tax evasion.

Mr. Gal has undertaken substantial efforts at great financial and personal expense to see these Reports corrected, to see his reputation partially restored, and to prevent this from occurring

again in the future. Indeed, Mr. Gal's prior attorney, R. Wayne Bond of Taylor English Duma LLP, contacted multiple individuals at LexisNexis no later than August 2, 2018, politely requesting corrective action. Despite offering assistance, I understand that no corrections have been made and these LexisNexis representatives have instead continued to permit serious false criminal accusations against Mr. Gal to persist undisturbed. Perhaps worse than LexisNexis's failure to ensure the accuracy of its criminal background checks and other consumer information is its continued callous disregard for the rights of Mr. Gal and the harm LexisNexis has caused him. It has been five months since Mr. Gal first attempted to amicably resolve this matter. True and correct copies of Mr. Bond's written communications with these individuals are enclosed herewith as Exhibit C.

You are further advised that Mr. Gal has not experienced any symptom of identity theft, and it is therefore believed that this false association is the product of LexisNexis's Bridger Insight XG platform and LexisNexis's failure to enact appropriate procedures to ensure the accuracy of its reports. Based on this information and in an effort to assist you in closing your investigation into this matter, I believe LexisNexis must take affirmative steps to disassociate Mr. Gal from Mr. "Gil" so as to prevent this from occurring again in future searches of LexisNexis's public records.

If you contend that the Reports do not constitute "consumer reports" under the FCRA and thus are not required to investigate and/or take corrective action, you should consider this letter a formal demand for a conspicuous retraction of the False Accusations. A retraction should be issued to all individuals and/or entities who received the Reports or any other similar report, should unequivocally provide that Mr. Gal is not the individual purportedly guilty of the False Accusations and that he was identified as that individual in error, and be published in as conspicuous a manner as the original accusations against Mr. Gal. Further, should you so contend that the Reports are not "consumer reports," please respond in writing confirming such and providing the basis for that determination.

Finally, this letter also serves as notice to you and your affiliated entities, employees, agents, and assignees (collectively, "you") to preserve any and all evidence related in any way to the Reports and/or the False Accusations. By this letter, you are hereby directed not to destroy, conceal, or alter any paper or electronic files, physical evidence, and/or other data, relating in any way, no matter how remote, to the Reports and/or the circumstances leading to the dissemination of the False Accusations, including, but not limited to: (1) all sources for the Reports and/or False Accusations; (2) any and all documents and data referring to, reflecting, or relating to communications between you and any such sources regarding the Reports and/or the False Accusations; (3) any and all documents and data referring to, reflecting, or relating to internal communications regarding the Reports and/or False Accusations; (4) any and all documents and data referring to, reflecting, or relating to communications between you and any third party regarding the Reports and/or False Accusations; (5) all documents and communications referring to, reflecting, or relating to any research, analysis, and data relied upon by you for the publication of the Reports and/or False Accusations; (6) all documents, data, and communications concerning or relating to LexisNexis's procedures for ensuring the accuracy of its Bridger Insight XG reports; and (7) all documents and communications relating in any manner to your determination as to

LexisNexis
January 4, 2019
Page 3 of 3

whether reports generated by LexisNexis's Bridger Insight XG platform are "consumer reports" governed by the FCRA.

Your prompt attention to this matter is required, and, in any case, I would appreciate a written response no later than thirty days from the date of this letter.

Sincerely,



G. Taylor Wilson

cc: Mr. Ziv Gal
Mr. Glenn Brown (glenn.brown@lexisnexus.com)
Mr. Gerry Washington (gerry.washington@lexisnexus.com)

EXHIBIT A

EXHIBIT A

Wednesday, June 13, 2018
Created By: Ellen

Aegis Fiduciary Services, LLC

Ziv Gal
Current Address [REDACTED] SSN [REDACTED] Current Status None
Alert ID: 1170302721
Division Default division DOB [REDACTED] 1966 Assigned to Ellen
Alert State Open

Screening Lists

Score	Entity Name	Best Match	File	Source Date
85	Ziv Or Gil	Or Gil, Ziv	WorldCompliance - Enforcement	6/11/2018
85	Ziv Or Gil	Or Gil, Ziv	WorldCompliance - Full	6/11/2018

Aegis Fiduciary Services, LLC

Created By: Ellen

Name:	Ziv Gal	Alert ID:	1170302721	Assigned to:	Ellen
SSN:	[REDACTED]	Origin:	RealTime	Record Status:	None
DOB:	1966	Search Date:	6/13/2018	Updated By:	
Phone:	[REDACTED]	Search Time:	11:54 AM	Alert State:	Open
Account ID:	[REDACTED]	Division:	Default division	Updated By:	
Address:	[REDACTED]	Searched By:	Ellen		

1. Ziv Or Gil

Score: 85 - WorldCompliance® - Enforcement

Source Date: 6/11/2018
 Entity Type: Individual
 Gender: Male
 Number: 7671125
 Entity Date: 11/24/2016
 Reason Listed: Enforcement:Smuggling
 Comments

Match Summary	
Input Information	Source Information
Name: Ziv Gal	☺ Ziv Or Gil

Source: Israel,IL-Israel Tax Authority || Offense: Ordered to pay ILS 120,000 for smuggling and tax evasion - 2011 || Category: Enforcement | Subcategory: Smuggling || Last updated: 2016-11-25 || Profile Notes: According to the Israel Tax Authority; 2011: Ziv Or Gil was ordered to pay ILS 120,000 for smuggling and tax evasion. He was suspected of smuggling diamonds in commercial quantities in 2011. The total price of diamonds was ILS 2,385,676.

AKAs

AKA זיו אור גיל

IDs

Proprietary UID: 7671125

Addresses

Address:

Country: Israel

Additional Information

Other Information: Link to WorldCompliance Online Database

Comments Or Gil, Ziv

<https://members.worldcompliance.com/metawatch2.aspx?id=f9718da6-6bc5-4299-af69-8d204e7c6e4a>

Other Information: Sources of Record Information

Comments <http://www.news1.co.il/Archive/0019-D-79798-00.html>

<https://taxes.gov.il/EnforcementAndDeterrence/Pages/EnforcementKoffer.aspx>

https://taxes.gov.il/enforcementanddeterrence/documents/vaadatkoffer/hahlatot_kofer2011b.pdf

2. Ziv Or Gil

Score: 85 - WorldCompliance® - Full

Source Date: 6/11/2018
 Entity Type: Individual
 Gender: Male
 Number: 7671125
 Entity Date: 11/24/2016
 Reason Listed: Enforcement:Smuggling
 Comments

Match Summary	
Input Information	Source Information
Name: Ziv Gal	☺ Ziv Or Gil

Source: Israel,IL-Israel Tax Authority || Offense: Ordered to pay ILS 120,000 for smuggling and tax evasion - 2011 || Category: Enforcement | Subcategory: Smuggling || Last updated: 2016-11-25 || Profile Notes: According to the Israel Tax Authority; 2011: Ziv Or Gil was ordered to pay ILS 120,000

for smuggling and tax evasion. He was suspected of smuggling diamonds in commercial quantities in 2011. The total price of diamonds was ILS 2,385,676.

AKAs

AKA דיו אור גיל

IDs

Proprietary UID: 7671125

Addresses

Address:

Country: Israel

Additional Information

Other Information: Link to WorldCompliance Online Database


Comments Or Gil, Ziv
<https://members.worldcompliance.com/metawatch2.aspx?id=f9718da6-6bc5-4299-af69-8d204e7c6e4a>

Other Information: Sources of Record Information

Comments <http://www.news1.co.il/Archive/0019-D-79798-00.html>
<https://taxes.gov.il/EnforcementAndDeterrence/Pages/EnforcementKoffer.aspx>
https://taxes.gov.il/enforcementanddeterrence/documents/vaadatkoffer/hahlatot_kofer2011b.pdf

Monday, July 09, 2018
Created By: Ellen

Aegis Fiduciary Services, LLC

Ziv Gal			Alert ID: 1226034711
Current Address		SSN	Current Status None
Division	Default division	DOB	Assigned to Ellen
		Account ID	Alert State Open

Screening Lists

Score	Entity Name	Best Match	File	Source Date
90	Gal Ziv	Ziv, Gal	WorldCompliance - Full	7/5/2018
85	Ziv Or Gil	Or Gil, Ziv	WorldCompliance - Enforcement	7/5/2018
85	Ziv Or Gil	Or Gil, Ziv	WorldCompliance - Full	7/5/2018

Aegis Fiduciary Services, LLC

Name: Ziv Gal Alert ID: 1226034711

Alert Information

Current Status: None Assigned to: Ellen Alert State: Open

Account Information

Type: Account Date: Amount:
Account ID: Member ID: Group ID:
Provider ID: Other Data:

Origin

Real-Time with List Screening on 7/9/2018 at 4:39 PM for Default division

Name

First	Last
Ziv	Gal

Address

Type	Address Line 1	City	State	Postal Code
Current	[REDACTED]			

Aegis Fiduciary Services, LLC

Name: Ziv Gal Alert ID: 1226034711 Assigned to: Ellen
 SSN: Origin: RealTime Record Status: None
 DOB: Search Date: 7/9/2018 Updated By:
 Phone: Search Time: 4:39 PM Alert State: Open
 Account ID: Division: Default Updated By:
 division
 Address: [REDACTED] Searched By: Ellen

1. Gal Ziv Score: 90 - WorldCompliance® - Full

Source Date: 7/5/2018
 Entity Type: Individual
 Gender: Male
 Number: 5259596
 Entity Date: 1/6/2014
 Reason Listed: National:PEP:Family Member
 Comments: Source: International,Website || Level: National | Category: PEP | Subcategory: Family Member || Associations: | Mother (PEP:Govt Branch Member): Yachimovich, Shelly, 933024 || Last updated: 2016-05-14

Match Summary	
Input Information	Source Information
Name: Ziv Gal	Gal Ziv

AKAs
 AKA זיב זל

IDs
 Proprietary UID: 5259596

Addresses
 Address:
 Country: Israel

Additional Information
 Date of Birth: 1992/00/00
 Date of Birth: 1991/00/00
 Occupation: Son of Shelly Yachimovich, Member of the Knesset
 Comments: Starting 0 Ending 0
 Other Information: Link to WorldCompliance Online Database
 Comments: Ziv, Gal
<https://members.worldcompliance.com/metawatch2.aspx?id=3c518d42-d9cf-408c-9b4b-4cc2097c5625>
 Other Information: Sources of Record Information
 Comments: <http://www.havoda.org.il/>
<http://www.the7eye.org.il/lexicon/47593>
<http://www.shelly.org.il/about>
<http://forward.com/articles/143667/shelly-yachimovich-started-protesting-at-early-age/>

2. Ziv Or Gil Score: 85 - WorldCompliance® - Enforcement

Source Date: 7/5/2018
 Entity Type: Individual
 Gender: Male
 Number: 7671125
 Entity Date: 11/24/2016
 Reason Listed: Enforcement:Smuggling

Match Summary	
Input Information	Source Information
Name: Ziv Gal	Ziv Or Gil

Comments Source: Israel,IL-Israel Tax Authority || Offense: Ordered to pay ILS 120,000 for smuggling and tax evasion - 2011 || Category: Enforcement | Subcategory: Smuggling || Last updated: 2016-11-25 || Profile Notes: According to the Israel Tax Authority; 2011: Ziv Or Gil was ordered to pay ILS 120,000 for smuggling and tax evasion. He was suspected of smuggling diamonds in commercial quantities in 2011. The total price of diamonds was ILS 2,385,676.

AKAs

AKA זיו אור גיל

IDs

Proprietary UID: 7671125

Addresses

Address:

Country: Israel

Additional Information

Other Information: Link to WorldCompliance Online Database

Comments Or Gil, Ziv
<https://members.worldcompliance.com/metawatch2.aspx?id=f9718da6-6bc5-4299-af69-8d204e7c6e4a>

Other Information: Sources of Record Information

Comments <http://www.news1.co.il/Archive/0019-D-79798-00.html>
<https://taxes.gov.il/EnforcementAndDeterrence/Pages/EnforcementKoffer.aspx>
https://taxes.gov.il/enforcementanddeterrence/documents/vaadatkoffer/hahlatot_kofer2011b.pdf

3. Ziv Or Gil

Score: 85 - WorldCompliance@ - Full

Source Date: 7/5/2018

Entity Type: Individual

Gender: Male

Number: 7671125

Entity Date: 11/24/2016

Reason Listed: Enforcement:Smuggling

Comments Source: Israel,IL-Israel Tax Authority || Offense: Ordered to pay ILS 120,000 for smuggling and tax evasion - 2011 || Category: Enforcement | Subcategory: Smuggling || Last updated: 2016-11-25 || Profile Notes: According to the Israel Tax Authority; 2011: Ziv Or Gil was ordered to pay ILS 120,000 for smuggling and tax evasion. He was suspected of smuggling diamonds in commercial quantities in 2011. The total price of diamonds was ILS 2,385,676.

Match Summary		
	Input Information	Source Information
Name:	Ziv Gal	👤 Ziv Or Gil

AKAs

AKA זיו אור גיל

IDs

Proprietary UID: 7671125

Addresses

Address:

Country: Israel

Additional Information

Other Information: Link to WorldCompliance Online Database

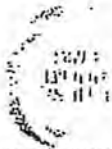
Comments Or Gil, Ziv
<https://members.worldcompliance.com/metawatch2.aspx?id=f9718da6-6bc5-4299-af69-8d204e7c6e4a>

Other Information: Sources of Record Information

Comments <http://www.news1.co.il/Archive/0019-D-79798-00.html>
<https://taxes.gov.il/EnforcementAndDeterrence/Pages/EnforcementKoffer.aspx>
https://taxes.gov.il/enforcementanddeterrence/documents/vaadatkoffer/hahlatot_kofer2011b.pdf

EXHIBIT B

EXHIBIT B



לשכת סמנכ"ל בכיר
לחקירות, מודיעין, סמים ותפישות

יט באב תשע"ח
31 ביולי 2018

תאריך:
תיק:
סימוכין:

א.ג.נ.

הנדון: תחלטת כופר מכס ומע"מ מס' 67/11.

אבהיש להבהיר כי החלטת כופר מכס ומע"מ מספר 67/11, איננה נוגעת לנושא תעודת זהות
מספר 022480248

ב ב ר כ ה ,

אשר מזרחי
מנהל תחום-ככור תפישות



תעודת רישום לידה

שם משפחה		ש	
שם פרטי		1.5	
מין	כספי	זכר	
קק"ל לידה		בית גלילי	
מספר לידה	שם בנות התולים	הער/רבבר	
	שם	יום	חודש
לוקד	אלף השפ מאור	ש"ס	שנה
	יום	חודש	שנה
יה		לאת	יה/3
האב		מרת 3/3	
האם		בונה	

זי מאשר כי הילדה הנ"ל נרשם ביום 26.4.66... בפנקס הלידות באות... בדף... חלק ווו סעיף 6 (1) לפקודה בריאות העם, 1940, ובספר התושבים לפי סעיף 3 לפקודת מרשם שביטה, חש"ט-1949.

הוצאה במשרד הפנים ב... ארז

רזה מספר № 557997

בתאריך... 5.66

חתימת סגן רישום לידות
א. יחזקאל



ד.ס.ר. 100 X 100 (11.54/2179) 2164 1789/7

EXHIBIT C

EXHIBIT C

Taylor Wilson

From: R. Wayne Bond <wbond@taylorenghish.com>
Sent: Thursday, August 02, 2018 4:28 PM
To: Glenn Brown (glenn.brown@lexisnexis.com)
Subject: Identity Theft / False Positive Issue with LexisNexis Bridger Insight
Attachments: Ziv Gal Background check 6-13-2018.pdf; Ziv Gal.pdf; Background check services list.docx

Hi Glenn,

Thanks for your call this week. I really appreciate your willingness to help.

The problem was caused by a LexisNexis search conducted by Aegis Fiduciary Services in connection with a financial transaction we are working on. My client is Ziv Gal (no middle name). More details regarding his PII are in the chart below. When Aegis put his name in the LexisNexis database, the first attached report was generated, suggesting Ziv was "suspected of smuggling diamonds in commercial quantities...."

The people at Aegis said they put Ziv's name into the LexisNexis program correctly several times with various amounts of additional corroborating information (e.g., address, DOB, SSN, phone numbers, etc.), and the results were always the same. When some of the information was left out, the results generated one more individual. The second attachment is the report Aegis provided showing the results LexisNexis provided when it ran the report with Ziv's name, address and phone number without a DOB or SSN. The third attachment is a Word document provided by Aegis, which apparently lists the databases included in the search.

The false positive results are complicating our transaction and the client would like them to be eliminated or else he would like to receive an unequivocal statement from LexisNexis that none of the three individuals in the attached reports (including the diamond smuggler) are him.

Here is a table with "real" and "fake" identities that are creating the problems:

	Real Ziv	Fake Ziv (per LexisNexis Report)
Full Name	Ziv Gal	Ziv Or Gil / Ziv Orr Gil
Residence Address	[REDACTED]	[REDACTED]
Business Address	[REDACTED]	
Business Phone	[REDACTED]	
Home Phone	[REDACTED]	[REDACTED] (does not say if "home")
SSN	[REDACTED]	[REDACTED] [this is the way it is displayed on report]
DOB	[REDACTED] 1966 [on birth certificate, it may look like [REDACTED] 1966]	[REDACTED] 1966 [this is the way it is displayed on report]
Misc	Travels to Israel on a regular basis. Born in Afula, Israel (see Birth Certificate) Has been living in U.S. for 17 years.	Was in Israel in 2011 Ordered to pay 120,000 shekels for smuggling and tax evasion Suspected of smuggling diamonds in commercial quantities

	U.S. Citizen (became US citizen in 2010). Never dealt with diamonds	Total price of diamonds was ILS 2,385,676 (approx. \$30k?)
AKA		זיו אור גיל (translated means Ziv, Orr, Gil [Ziv is the only name that matches])
Israeli ID number	Israeli ID number is: [REDACTED] (found on Passport) 7 digits in middle are key.	
IDs		"Proprietary UID" (listed on report) is 7671125 (7 digits)

The key issue for Aegis appears to be the fact that the individual in the right column ("Fake Ziv") has some of "Real Ziv's" PII associated with him. In other words, Ziv thought he could solve the problem and show he was not a diamond smuggler by providing more PII that was unique to him. Instead, the LexisNexis reports show Ziv's DOB, SSN, and phone number being associated with the other, incorrect individuals, one of whom is a diamond smuggler. By separate emails, I will provide copies of back-up documentation for the data in the table above.

Wayne



R. Wayne Bond

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7290 | wbond@taylorenghish.com

[Website](#) | [vCard](#) | [LinkedIn](#)

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Taylor Wilson

From: R. Wayne Bond <wbond@taylorenghish.com>
Sent: Thursday, August 02, 2018 4:37 PM
To: Glenn Brown (glenn.brown@lexisnexis.com)
Subject: RE: Identity Theft / False Positive Issue with LexisNexis Bridger Insight
Attachments: Ziv Passport.jpg

Hi Glenn,

The first item of back-up documentation is Ziv's passport (attached).

Wayne



R. Wayne Bond

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339
P: 678.336.7290 | wbond@taylorenghish.com
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From: R. Wayne Bond
Sent: Thursday, August 2, 2018 4:28 PM
To: Glenn Brown (glenn.brown@lexisnexis.com) <glenn.brown@lexisnexis.com>
Subject: Identity Theft / False Positive Issue with LexisNexis Bridger Insight

Hi Glenn,

Thanks for your call this week. I really appreciate your willingness to help.

The problem was caused by a LexisNexis search conducted by Aegis Fiduciary Services in connection with a financial transaction we are working on. My client is Ziv Gal (no middle name). More details regarding his PII are in the chart below. When Aegis put his name in the LexisNexis database, the first attached report was generated, suggesting Ziv was "suspected of smuggling diamonds in commercial quantities...."

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The false positive results are complicating our transaction and the client would like them to be eliminated or else he would like to receive an unequivocal statement from LexisNexis that none of the three individuals in the attached reports (including the diamond smuggler) are him.

Here is a table with "real" and "fake" identities that are creating the problems:

	Real Ziv	Fake Ziv (per LexisNexis Report)
Full Name		
Residence Address		
Business Address		
Business Phone		
Home Phone		
SSN		
DOB		
Misc		
AKA		
Israeli ID number		
IDs		

The key issue for Aegis appears to be the fact that the individual in the right column ("Fake Ziv") has some of "Real Ziv's" PII associated with him. In other words, Ziv thought he could solve the problem and show he was not a diamond smuggler by providing more PII that was unique to him. Instead, the LexisNexis reports show Ziv's DOB, SSN, and phone number being associated with the other, incorrect individuals, one of whom is a diamond smuggler. By separate emails, I will provide copies of back-up documentation for the data in the table above.

Wayne



R. Wayne Bond

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7290 | wbond@taylorenghish.com

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Taylor Wilson

From: R. Wayne Bond <wbond@taylorenghish.com>
Sent: Thursday, August 02, 2018 4:38 PM
To: Glenn Brown (glenn.brown@lexisnexis.com)
Subject: RE: Identity Theft / False Positive Issue with LexisNexis Bridger Insight
Attachments: Ziv Birth Certificate.jpg

Hi Glenn,

The second first item of back-up documentation is Ziv's birth certificate (attached).

Wayne



R. Wayne Bond

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339
P: 678.336.7290 | wbond@taylorenghish.com
[Website](#) | [vCard](#) | [LinkedIn](#)

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From: R. Wayne Bond
Sent: Thursday, August 2, 2018 4:28 PM
To: Glenn Brown (glenn.brown@lexisnexis.com) <glenn.brown@lexisnexis.com>
Subject: Identity Theft / False Positive Issue with LexisNexis Bridger Insight

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Full Name		
Residence Address		
Business Address		
Business Phone		
Home Phone		
SSN		
DOB		
Misc		
AKA		
Israeli ID number		
IDs		

The key issue for Aegis appears to be the fact that the individual in the right column ("Fake Ziv") has some of "Real Ziv's" PII associated with him. In other words, Ziv thought he could solve the problem and show he was not a diamond smuggler by providing more PII that was unique to him. Instead, the LexisNexis reports show Ziv's DOB, SSN, and phone number being associated with the other, incorrect individuals, one of whom is a diamond smuggler. By separate emails, I will provide copies of back-up documentation for the data in the table above.

Wayne



R. Wayne Bond
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Taylor Wilson

From: R. Wayne Bond <wbond@taylorenghish.com>
Sent: Thursday, August 02, 2018 4:52 PM
To: Glenn Brown (glenn.brown@lexisnexis.com)
Subject: RE: Identity Theft / False Positive Issue with LexisNexis Bridger Insight
Attachments: Letter re Ziv from Office of SVP of Investigations, Intelligence, Drugs and Catches.pdf

Hi Glenn,

The third item of back-up documentation my client provided is a letter he obtained from the Israeli SVP Office of Investigations, Intelligence, Drugs and Catches (attached). Since it is written in Hebrew, my client provided the following translation:

Re: The Customs and VAT violation settlement payment case number 67/11

This letter is to clarify that the decision regarding Customs and VAT violation settlement payment case number 67/11 is not related to person who's Israeli ID number is [REDACTED].

Regards,

Asher Mizrachi
Senior Catches Manager

I can provide more documentation as needed, but let me know if this is enough for now.

Wayne



R. Wayne Bond

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339
P: 678.336.7290 | wbond@taylorenghish.com
[Website](#) | [vCard](#) | [LinkedIn](#)

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From: R. Wayne Bond
Sent: Thursday, August 2, 2018 4:28 PM
To: Glenn Brown (glenn.brown@lexisnexis.com) <glenn.brown@lexisnexis.com>
Subject: Identity Theft / False Positive Issue with LexisNexis Bridger Insight

Hi Glenn,

Thanks for your call this week. I really appreciate your willingness to help.

The problem was caused by a LexisNexis search conducted by Aegis Fiduciary Services in connection with a financial transaction we are working on. My client is Ziv Gal (no middle name). More details regarding his PII are in the chart below. When Aegis put his name in the LexisNexis database, the first attached report was generated, suggesting Ziv was "suspected of smuggling diamonds in commercial quantities...."

The people at Aegis said they put Ziv's name into the LexisNexis program correctly several times with various amounts of additional corroborating information (e.g., address, DOB, SSN, phone numbers, etc.), and the results were always the same. When some of the information was left out, the results generated one more individual. The second attachment is the report Aegis provided showing the results LexisNexis provided when it ran the report with Ziv's name, address and phone number without a DOB or SSN. The third attachment is a Word document provided by Aegis, which apparently lists the databases included in the search.

The false positive results are complicating our transaction and the client would like them to be eliminated or else he would like to receive an unequivocal statement from LexisNexis that none of the three individuals in the attached reports (including the diamond smuggler) are him.

Here is a table with "real" and "fake" identities that are creating the problems:

	Real Ziv	Fake Ziv (per LexisNexis Report)
Full Name		
Residence Address		
Business Address		
Business Phone		
Home Phone		
SSN		
DOB		
Misc		
AKA		
Israeli ID number		
IDs		

The key issue for Aegis appears to be the fact that the individual in the right column ("Fake Ziv") has some of "Real Ziv's" PII associated with him. In other words, Ziv thought he could solve the problem and show he was not a diamond smuggler by providing more PII that was unique to him. Instead, the LexisNexis reports show Ziv's DOB, SSN, and phone number being associated with the other, incorrect individuals, one of whom is a diamond smuggler. By separate emails, I will provide copies of back-up documentation for the data in the table above.

Wayne



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Taylor Wilson

From: R. Wayne Bond <wbond@taylorenghish.com>
Sent: Wednesday, July 25, 2018 4:35 PM
To: Washington, Gerry (LNG-DAY)
Subject: RE: LexisNexis Reports with False Positives

Hi Gerry,

Per my voice message to you a few minutes ago, the phone number you provide below (800 915-8930) is the same one I began and ended my 1 hour 20-minute ordeal with yesterday. It is worthless, unless you can give me the name and extension of a real person at this number who can understand the false positive problem and can help.

Can you call so we can discuss other options?

Thx much,
Wayne



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From: R. Wayne Bond
Sent: Wednesday, July 25, 2018 4:25 PM
To: Washington, Gerry (LNG-DAY) <gerry.washington@lexisnexis.com>
Subject: RE: LexisNexis Reports with False Positives

Hi Gerry,

I complied with your request below and received the attached. I'm afraid I'm getting nowhere fast. Can you call to explain?

Wayne



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From: Washington, Gerry (LNG-DAY) <gerry.washington@lexisnexis.com>
Sent: Wednesday, July 25, 2018 4:09 PM
To: R. Wayne Bond <wbond@taylorenghish.com>
Subject: RE: LexisNexis Reports with False Positives

Hello Wayne,

Can you send this information that you sent me to the following email address? :

bridgerinsightsupport@lexisnexis.com

When I send this information to this email address, I receive an email address request denied, unrecognizable email address.

The telephone number that I was given is: (800 915-8930 – hours 2pm 6pm (Mountain Standard Time)

Let me know if you have any questions.

Gerry L. Washington, J.D./MBA
Large Law Telephonic Practice Area Consultant



Direct: 937-247- 1670
Toll Free: 800-227-9597 ext. 247-1670
gerry.washington@lexisnexis.com

[Schedule a consultation with Gerry!](#)

[View Gerry's screen](#)

From: R. Wayne Bond [<mailto:wbond@taylorenghish.com>]
Sent: Wednesday, July 25, 2018 3:09 PM
To: Washington, Gerry (LNG-DAY) <gerry.washington@lexisnexis.com>
Subject: LexisNexis Reports with False Positives

*** External email: use caution ***



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Forbes Small Giants Award Recipient

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Taylor Wilson

From: R. Wayne Bond <wbond@taylorenghish.com>
Sent: Wednesday, July 25, 2018 3:09 PM
To: Washington, Gerry (LNG-DAY)
Subject: LexisNexis Reports with False Positives
Attachments: image001.jpg; image002.png; Ziv Gal Background check 6-13-2018.pdf; Ziv Gal.pdf

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<<https://www.taylorenghish.com/about-honors-forbes-small-giants-award.html>> Forbes Small Giants Award Recipient

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EXHIBIT E

EXHIBIT E

From: "LexisNexis Consumer Support" <consumer_solutions@mailva.custhelp.com>
Date: January 18, 2019 at 8:24:41 AM EST
To: [REDACTED]
Subject: Full File Disclosure - Inquiry Contacts - BRIDGERRequest [Incident: 190116-002047]
Reply-To: "LexisNexis Consumer Support" <consumer_solutions@mailva.custhelp.com>



Recently you requested personal assistance from our on-line support center. Below is a summary of your request and our response. If this issue is not resolved to your satisfaction, you may reopen it within the next 7 days. Thank you for allowing us to be of service to you.
To update your question with additional information, [click here](#)

Subject

Full File Disclosure - Inquiry Contacts - BRIDGERRequest

Response By Email (Betty) (01/18/2019 08:24 AM)

Dear Ziv,

Thank you for contacting LexisNexis. Your comments and questions are very important to us.

We received your Full File Disclosure and Bridger request. Your report is being sent in the mail and should arrive within 7-10 business days.

If any additional assistance is required, please feel free to contact us again.


LexisNexis Consumer Center

Customer By CSS Email (Ziv Gal) (01/16/2019 04:42 PM)

*** External email: use caution ***

To whom it may concern,
Attach a Request for Full File Disclosure of my records with Lexis
Nexis. Please forward it to me as mentioned in the submission letter.

Thank you,

Ziv Gal


Question Reference # 190116-002047

Date Created: 01/16/2019 04:42 PM

Date Last Updated: 01/18/2019 08:24 AM

Status: Solved

Escalation Due No Value