

May 18, 2020

Via US Mail

Public Inquiry Unit
Office of the Attorney General of California,
P.O. Box 944255
Sacramento, CA 94244-2550

RE: Complaint Received, Craig Erickson

The enclosed complaint submitted to your office by Craig Erickson has been referred to our team for review and response on behalf of Bank of the West (the "Bank"). We also received a similar complaint directly to Bank of the West's Customer Service Contact Center via email. This letter will serve as response to both (collectively, the "complaint").

To summarize the complaint, Mr. Erickson stated that he was denied access to the Bank's Online Banking service during a critical time because the answers he provided to the security questions asked by LexisNexis were incorrect. He also stated that he was also denied his opportunity to exercise his rights under the California Consumer Privacy Act to lodge a formal complaint for the same reasons. He requested the ability to correct the record maintained by LexisNexis in order to complete Online Banking enrollment.

The Bank is committed to fair and responsible banking and we take allegations of conduct contrary to these principles very seriously.

The Bank is required under our customer identification practices to verify all customers' identity. It is our practice to use a third-party identification system provided by a corporation called LexisNexis, which maintains a vast collection of public records. The Bank utilizes this system to verify identity when reviewing activity via Online Banking. This is a common industry practice as a security measure designed to protect both consumers and financial institutions from fraud. Unfortunately, in this case, it caused Mr. Erickson an inconvenience for which we apologize.

Please know that the Bank cannot address questions he may have in regard to information that LexisNexis has on file. We suggest reviewing their website for information and resources at:
<http://www.lexisnexis.com/privacy/for-consumers/infres.aspx>

Our records indicate that beginning on April 8, 2020 Mr. Erickson established contact regarding this matter with Tony Zarif, Branch Manager/ Vice President of the Lakeshore Branch located at 3400 Lakeshore Avenue Oakland, CA 94610 (the "Branch"). From that point, our research shows that Mr. Zarif worked in conjunction with the appropriate departments to escalate his concerns regarding the Online Banking access and his alleged inability to lodge a complaint. As of April 27, 2020 reports indicate that Mr. Erickson provided the Bank with the required completed Online Banking enrollment form. The form was submitted on his behalf and as of May 4, 2020 his account profile indicated that Mr. Erickson was successfully enrolled in Online Banking.