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File No. 10112

**BY EMAIL TO [krebsonsecurity@gmail.com](mailto:krebsonsecurity@gmail.com) AND DELIVERED**

Brian Krebs  
Krebs on Security LLC

Dear Mr. Krebs:

**Re: Notice of Libel in Post Published August 24, 2015**

I am counsel to Raja Bhatia. On August 24, 2015, Krebs on Security published a post titled, “Leaked Ashley Madison Emails Suggest Execs Hacked Competitors” (<https://krebsonsecurity.com/2015/08/leaked-ashleymadison-emails-suggest-execs-hacked-competitors/>). This article contains false and defamatory statements about Mr. Bhatia. We ask Krebs on Security to immediately retract and correct them.

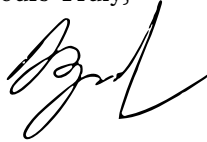
Contrary to the express statement in the article’s title and the suggestion in its body, Mr. Bhatia did not “hack” Nerve.com. Rather, he noticed a readily apparent security gap and remarked on it to Noel Biderman, Ashley Madison’s CEO, with whom he happened to speak shortly thereafter. At no time did Mr. Bhatia attempt to bypass Nerve.com’s security or to exploit its gap in any way. He did not bulk exfiltrate this data or attempt to alter it, as implied by the selective quotes from his emails included in your post. To the contrary, Mr. Bhatia expressly stated that he would not do so in the email sequence referred to in the article, a point omitted from your report.

The post contains the further misleading implication that Mr. Bhatia was reviewing Nerve.com’s security in conjunction with Avid Life Media’s consideration of acquiring Nerve.com. That implication is inaccurate. Mr. Bhatia ceased to work at Avid Life in 2009 and was unaware that Avid Life was considering any acquisition in November 2012.

We require Krebs on Security to immediately issue a retraction and correction indicating the following:

1. Mr. Bhatia did not hack Nerve.com. He merely noticed a readily apparent inadequacy in the site’s security and remarked on that observation to Mr. Biderman without attempting to bypass its security or to exploit the gap by downloading or manipulating Nerve.com’s database; and
2. Mr. Bhatia was not working for Avid Life Media or Ashley Madison at the time.

Yours Truly,

A handwritten signature in black ink, appearing to read 'D. Naymark', written in a cursive style.

Daniel Naymark