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1/7/2022 10:34 AM  
IRIS Y. MARTINEZ  
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

PAUL SAYAS and BENIAMIN VARO, )  
on behalf of themselves and )  
similarly situated individuals, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
BIOMETRIC IMPRESSIONS CORP., )  
 )  
Defendant. )

Case No. 2020 CH 00201  
Jury Demand  
Judge Allen P. Walker

**SECOND AMENDED CLASS ACTION COMPLAINT**

NOW COMES Named Plaintiffs, PAUL SAYAS and BENIAMIN VARO (collectively, "Named Plaintiffs"), on behalf of themselves and similarly situated individuals, for their Second Amended Class Action Complaint against BIOMETRIC IMPRESSIONS CORP. allege as follows:

**INTRODUCTION**

1. This lawsuit arises under the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* ("BIPA") for Defendant's practice of storing and collecting the fingerprints of Plaintiffs and similarly situated individuals, without proper notification and authorization. Plaintiffs seeks to certify this matter as a class action pursuant to section 2-801 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-801.

**PARTIES**

2. Paul Sayas ("Plaintiff Sayas" or "Sayas") is and at all relevant times was an Illinois citizen and resident of Cook County.

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3. Benjamin Varo (“Plaintiff Varo” or “Varo”) is and at all relevant times was an Illinois citizen and resident of Cook County.

4. Biometric Impressions Corp. (“Defendant” or “Biometric Impressions”) is and at all relevant times was an Illinois corporation with over twenty-five different office locations throughout the state of Illinois, and, therefore, is a citizen of Illinois.

### **JURISDICTION AND VENUE**

5. This Court has jurisdiction over this matter pursuant to 735 ILCS 5/2-209(a)(1) because the violations complained of herein were committed by Defendant in Illinois, and, pursuant to 735 ILCS 5/2-209(b)(4) because Defendant conducts and transacts business from and within the state of Illinois.

6. Venue is proper in the Circuit Court of Cook County, Illinois as Varro is domiciled in Cook County and Sayas was domiciled in Cook County at the time of the injury.

### **FACTUAL BACKGROUND**

7. Biometric Impressions is and at all relevant times was a licensed fingerprint vendor and a criminal background check service provider for a wide variety of clients in a number in governmental and private industries.

8. Biometric Impressions charges clients and customers a fee for its fingerprinting and background check services (collectively, “BIC Services”).

9. Biometric Impressions collects fingerprints from its own employees as well as other individuals for various purposes, including but not limited to: concealed carry license, medical marijuana, bus, taxi, tow truck and chauffer drivers, amusement ride

safety, private adoption, not-for-profit volunteers, security companies, physicians and chiropractors, educational, child and elderly care services, nursing home residents, healthcare workers, state permits, fingerprint vendors, locksmiths, private detectives, and real estate appraisers, etc.

10. In order to conduct BIC Services, Biometric Impressions collects fingerprints from individuals through “live scan” fingerprint technology.

11. Biometric Impressions is a fingerprint vendor registered with the Illinois Department of Financial & Professional Regulation under License 262.000039.

12. Biometric Impressions is not a contractor, subcontractor or agent of the Illinois Department of Public Health for purposes of conducting fingerprint based background checks.

13. Biometric Impressions is not paid or otherwise compensated by the Illinois Department of Public Health for conducting fingerprint based background checks.

14. At all times relevant, the Illinois Department of Financial & Professional Regulation required that licensed fingerprint vendors “shall conduct all fingerprint services in accordance with applicable local, State and federal law regarding privacy, confidentiality and information release, including but not limited to the Illinois Biometric Information Privacy Act.” 68 Ill. Admin. Code Section 1240.620(d).

15. Section 14/25(d) of BIPA states that “nothing in this Act shall be construed to conflict with the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004 and the rules promulgated thereunder.” 740 ILCS 14/25(d).

16. Section 14/15(a) of BIPA requires that a company in possession of biometric identifiers or biometric information to develop a written policy, made available to the public, establishing a retention schedule and guidelines for permanently destroying biometric identifiers or biometric information when the initial purpose for collecting or obtaining such identifiers or information has been satisfied or within three (3) years of the person's last interaction with the company. 740 ILCS 14/15(a).

17. Section 14/15(b) of BIPA prohibits a company from, among other things, collecting, capturing, purchasing, receiving through trade or otherwise obtaining a person's or a customer's biometric identifiers or biometric information, unless it first (1) informs the individual in writing that a biometric identifier or biometric information is being collected or stored; (2) informs the individual in writing of the specific purpose and length of time for which a biometric identifier or biometric information is being collected, stored and used; and (3) receives a written release executed by the subject of the biometric identifier or biometric information. 740 ILCS 14/15(b).

18. In May 2019, a private prospective employer directed Sayas to go to Biometric Impressions to obtain a background check through Biometric Impressions.

19. On May 3, 2019, Sayas paid \$35.00 to Biometric Impressions for background check service required by his private prospective employer.

20. On May 3, 2019, Biometric Impressions collected and stored Sayas' fingerprints.

21. On the day Biometric Impressions collected Sayas' fingerprints, Biometric Impressions provided Sayas with a form acknowledging his payment for the services

rendered. A true and correct copy of the form is attached hereto as Exhibit A.

22. In or around November of 2018, Biometric Impressions hired Varo as a Fingerprint Technician.

23. Shortly after hiring, Biometric Impressions collected and stored Varo's fingerprints.

24. When Biometric Impressions collected and stored Sayas' and Varo's fingerprints it did not provide written notification to Sayas nor Varo that: (a) biometric identifiers or biometric information was being collected or stored; nor (b) the specific purpose and length of term for which his biometric identifiers or biometric information was being collected, stored and used.

25. Biometric Impressions never received a written release from Sayas nor Varo for the collection and storage of biometric identifiers or biometric information.

26. Upon information and belief, Biometric Impressions never established nor published a BIPA-mandated retention and/or destruction policy and none was made available to Sayas or Varo, similarly situated individuals, or any members of the general public.

27. As a result of Biometric Impressions' conduct, Sayas and Varo have suffered personal injury, advertising injury, and/or a violation of privacy resulting in emotional upset, mental anguish, and mental injury. For example, Sayas and Varo experience mental anguish and injury when thinking about what would happen to their biometric data if Biometric Impressions goes bankrupt, whether Biometric Impressions

will ever delete their biometric data, and whether (and to whom) Biometric Impressions shares their biometric data.

### CLASS ALLEGATIONS

28. Pursuant to section 2-801 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-801, Plaintiffs brings this action on his own behalf and as a representatives of all other similarly situated individuals to recover statutory penalties, prejudgment interest, attorneys' fees and costs, and other damages owed.

29. As discussed *supra*, Section 14/15(a) of BIPA requires that a company in possession of biometric identifiers or biometric information to develop a written policy, made available to the public, establishing a retention schedule and guidelines for permanently destroying biometric identifiers or biometric information when the initial purpose for collecting or obtaining such identifiers or information has been satisfied or within three (3) years of the person's last interaction with the company. 740 ILCS 14/15(a).

30. As discussed *supra*, Section 14/15(b) of BIPA prohibits a company from, among other things, collecting, capturing, purchasing, receiving through trade or otherwise obtaining a person's or a customer's biometric identifiers or biometric information, unless it first (1) informs the individual in writing that a biometric identifier or biometric information is being collected or stored; (2) informs the individual in writing of the specific purpose and length of time for which a biometric identifier or biometric information is being collected, stored and used; and (3) receives a written release

executed by the subject of the biometric identifier or biometric information. 740 ILCS 14/15(b).

31. Plaintiffs seeks class certification under section 2-801 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-801, for the following classes of similarly situated individuals under BIPA:

Class A: Any and all individuals, not employed by Defendant, who had their fingerprints collected, captured, received, or otherwise obtained or disclosed by Defendant at a location within the state of Illinois during the applicable statutory period.

Class B: Any and all individuals, employed by Defendant, who had their fingerprints collected, captured, received, or otherwise obtained or disclosed by Defendant at a location within the state of Illinois during the applicable statutory period.

32. This action is properly maintained as a class under 735 ILCS 5/2-801 because:

- A. The class is so numerous that joinder of all members is impracticable;
- B. There are questions of law or fact that are common to the class;
- C. Plaintiffs' claims are typical of the claims of the class; and,
- D. Plaintiffs will fairly and adequately protect the interests of the class.

**Numerosity**

33. According to the Biometric Impressions website, it has collected "over half a million fingerprints." <https://www.biometricimpressions.com/> (December 31, 2019).

34. According to records from the Illinois State Police, Biometric Impressions has collected the fingerprints of thousands of individuals.

35. Furthermore, upon information and belief, Biometric Impressions has

collected the fingerprints at least fifty (50) of its own employees.

36. Therefore, upon information and belief, the total number of putative class members exceeds fifty (50) individuals.

37. The exact number of class members may easily be determined from Defendant's records and records from the Illinois State Police.

### Commonality

38. There are common questions of law and fact concerning and affecting the Class in that Plaintiffs and all members of the Class have been harmed by Defendant's failure to comply with BIPA. These common questions of law and fact include, but are not limited to, the following:

- A. Whether Defendant collected, captured or otherwise obtained Plaintiffs' and the Class' biometric identifiers or biometric information;
- B. Whether Defendant properly informed Plaintiffs and the Class of its specific purposes for collecting, using, storing and disseminating their biometric identifiers or biometric information;
- C. Whether Defendant obtained a written release (as defined in 740 ILCS 14/10) to collect, use, store and disseminate Plaintiffs' and the Class' biometric identifiers or biometric information;
- D. Whether Defendant has disclosed or re-disclosed Plaintiffs' and the Class' biometric identifiers or biometric information;
- E. Whether Defendant has sold, leased, traded or otherwise profited from Plaintiffs' and the Class' biometric identifiers or biometric information;
- F. Whether Defendant developed a written policy, made available to the public, establishing a retention schedule and guidelines for permanently destroying biometric identifiers or biometric information when the initial purpose for collecting or obtaining such identifiers or information has been satisfied or within three (3) years of the person's last interaction with the company;



- G. Whether Defendant's violations of BIPA have created a material risk that Plaintiffs' and the Class' biometric identifiers or biometric information will be unlawfully accessed by third parties;
- H. Whether the violations of BIPA were committed negligently; and,
- I. Whether the violations of BIPA were committed intentionally or recklessly.

39. Plaintiffs anticipate that Defendant will raise defenses that are common to the Class.

#### **Adequacy**

40. Plaintiffs will fairly and adequately protect the interests of all members of the Class and there are no known conflicts of interest between Plaintiffs and the Class. Plaintiff also retained experienced attorneys who are competent in the prosecution of complex litigation and who have extensive experience acting as class counsel.

#### **Predominance and Superiority**

41. The common questions of law and fact identified herein predominate over any individual issues.

42. A class action will allow large number of similarly situated individuals to prosecute their common claims in a single forum simultaneously, efficiently and without unnecessary duplication of effort and expense that would be incurred if each class member was required to bring an individual claim.

43. Individual joinder of the parties is impracticable. Therefore, a class action is superior to other available means for the fair and efficient adjudication of this controversy.

**COUNT I - VIOLATIONS OF BIPA**  
**740 CS 14/15(a)**

44. Named Plaintiffs incorporate and re-allege Paragraphs 1 through 43 as fully set forth herein as Paragraph 44.

45. Biometric Impressions is a “private entity” under BIPA. 740 ILCS 15/10.

46. Named Plaintiffs’ and the Class’ fingerprints are “biometric identifier[s]” and “biometric information” within the definition of BIPA. 740 ILCS 15/10.

47. Biometric Impressions obtained, stored and/or used Named Plaintiffs’ and the Class’ biometric identifiers or biometric information in course of its business as a licensed fingerprint vendor and background check service provider.

48. Biometric Impressions violated section 15(a) of BIPA, 740 ILCS 14/15(a) by capturing or collecting Named Plaintiffs’ and the Class’ fingerprints without first creating a written policy, made available to Named Plaintiffs and the Class, establishing a retention schedule and destruction guidelines for its possession of biometric identifiers and biometric information.

49. Biometric Impressions knew or should have known of the requirements of BIPA.

50. Because it knew or should have known of the requirements of BIPA, Biometric Impressions’ violations of BIPA were reckless, or, in the alternative, negligent.

51. As a result of Biometric Impressions’ conduct, Named Plaintiffs and the Class have suffered personal injury, advertising injury, and/or a violation of privacy resulting in emotional upset, mental anguish, and mental injury.

WHEREFORE Plaintiffs Paul Sayas and Benjamin Varo, on behalf of themselves and similarly situated individuals, respectfully request that this Honorable the Court enter judgment in their favor and against Defendant Biometric Impressions Corp. on Count I as follows:

- A. Award Named Plaintiffs and the Class statutory damages of \$5,000 for each willful and/or reckless violation of BIPA pursuant to 740 ILCS 14/20(2), or, in the alternative, statutory damages of \$1,000 for each negligent violation of BIPA pursuant to 740 ILCS 14/20(1);
- B. Enjoin Defendant from committing further violations of BIPA as permitted by 740 ILCS 14/20(4);
- C. Award Named Plaintiffs and the Class all reasonable attorneys' fees and costs, including other litigation expenses, as provided by 740 ILCS 14/20(3);
- D. Award Named Plaintiffs incentive Awards;
- E. Award Named Plaintiffs and the Class prejudgment interest; and,
- F. Any other relief this Court deems just and necessary.

**COUNT II - VIOLATIONS OF BIPA**  
**740 CS 14/15(b)(1)**

52. Named Plaintiffs incorporate and re-allege Paragraphs 1 through 43 as fully set forth herein as Paragraph 52.

53. Biometric Impressions is a "private entity" under BIPA. 740 ILCS 15/10.

54. Named Plaintiffs' and the Class' fingerprints are "biometric identifier[s]" and "biometric information" within the definition of BIPA. 740 ILCS 15/10.

55. Biometric Impressions obtained, stored and/or used Named Plaintiffs' and the Class' biometric identifiers or biometric information in course of its business as a licensed fingerprint vendor and background check service provider.

56. Biometric Impressions violated section 15(b)(1) of BIPA, 740 ILCS 14/15(b)(1) by capturing or collecting Named Plaintiffs' and the Class' fingerprints without first informing them in writing that their biometric data was being collected and/or stored.

57. Biometric Impressions knew or should have known of the requirements of BIPA.

58. Because it knew or should have known of the requirements of BIPA, Biometric Impressions' violations of BIPA were reckless, or, in the alternative, negligent.

59. As a result of Biometric Impressions' conduct, Named Plaintiffs and the Class have suffered personal injury, advertising injury, and/or a violation of privacy resulting in emotional upset, mental anguish, and mental injury.

WHEREFORE Plaintiffs Paul Sayas and Benjamin Varo, on behalf of themselves and similarly situated individuals, respectfully request that this Honorable the Court enter judgment in their favor and against Defendant Biometric Impressions Corp. on Count II as follows:

- A. Award Named Plaintiffs and the Class statutory damages of \$5,000 for each willful and/or reckless violation of BIPA pursuant to 740 ILCS 14/20(2), or, in the alternative, statutory damages of \$1,000 for each negligent violation of BIPA pursuant to 740 ILCS 14/20(1);
- B. Enjoin Defendant from committing further violations of BIPA as permitted by 740 ILCS 14/20(4);
- C. Award Named Plaintiffs and the Class all reasonable attorneys' fees and costs, including other litigation expenses, as provided by 740 ILCS 14/20(3);
- D. Award Named Plaintiffs incentive awards'

- E. Award Named Plaintiffs and the Class prejudgment interest; and,
- F. Any other relief this Court deems just and necessary.

**COUNT III - VIOLATIONS OF BIPA  
740 CS 14/15(b)(2)**

60. Named Plaintiffs incorporate and re-allege Paragraphs 1 through 43 as fully set forth herein as Paragraph 60.

61. Biometric Impressions is a “private entity” under BIPA. 740 ILCS 15/10.

62. Named Plaintiffs’ and the Class’ fingerprints are “biometric identifier[s]” and “biometric information” within the definition of BIPA. 740 ILCS 15/10.

63. Biometric Impressions obtained, stored and/or used Named Plaintiffs’ and the Class’ biometric identifiers or biometric information in course of its business as a licensed fingerprint vendor and background check service provider.

64. Biometric Impressions violated section 15(b)(2) of BIPA, 740 ILCS 14/15(b)(2), by capturing or collecting Named Plaintiffs’ and the Class’ fingerprints without first informing them in writing of the specific purpose and length of term for which their biometric data was being collected, stored and used.

65. Biometric Impressions knew or should have known of the requirements of BIPA.

66. Because it knew or should have known of the requirements of BIPA, Biometric Impressions’ violations of BIPA were reckless, or, in the alternative, negligent.

67. As a result of Biometric Impressions’ conduct, Named Plaintiffs and the Class have suffered personal injury, advertising injury, and/or a violation of privacy

resulting in emotional upset, mental anguish, and mental injury.

WHEREFORE Plaintiffs Paul Sayas and Benjamin Varo, on behalf of themselves and similarly situated individuals, respectfully request that this Honorable the Court enter judgment in their favor and against Defendant Biometric Impressions Corp. on Count III as follows:

- A. Award Named Plaintiffs and the Class statutory damages of \$5,000 for each willful and/or reckless violation of BIPA pursuant to 740 ILCS 14/20(2), or, in the alternative, statutory damages of \$1,000 for each negligent violation of BIPA pursuant to 740 ILCS 14/20(1);
- B. Enjoin Defendant from committing further violations of BIPA as permitted by 740 ILCS 14/20(4);
- C. Award Named Plaintiffs and the Class all reasonable attorneys' fees and costs, including other litigation expenses, as provided by 740 ILCS 14/20(3);
- D. Award Named Plaintiffs Incentive Awards;
- E. Award Named Plaintiffs and the Class prejudgment interest; and,
- F. Any other relief this Court deems just and necessary.

**COUNT IV - VIOLATIONS OF BIPA  
740 CS 14/15(b)(3)**

68. Named Plaintiffs incorporate and re-allege Paragraphs 1 through 43 as fully set forth herein as Paragraph 68.

69. Biometric Impressions is a "private entity" under BIPA. 740 ILCS 15/10.

70. Named Plaintiffs' and the Class' fingerprints are "biometric identifier[s]" and "biometric information" within the definition of BIPA. 740 ILCS 15/10.

71. Biometric Impressions obtained, stored and/or used Named Plaintiffs' and the Class' biometric identifiers or biometric information in course of its business as a

licensed fingerprint vendor and background check service provider.

72. Biometric Impressions violated section 15(b)(3) of BIPA, 740 ILCS 14/15(b)(3), by not obtaining a written release executed by Named Plaintiffs and the Class.

73. Biometric Impressions knew or should have known of the requirements of BIPA.

74. Because it knew or should have known of the requirements of BIPA, Biometric Impressions' violations of BIPA were reckless, or, in the alternative, negligent.

75. As a result of Biometric Impressions' conduct, Named Plaintiffs and the Class have suffered personal injury, advertising injury, and/or a violation of privacy resulting in emotional upset, mental anguish, and mental injury.

WHEREFORE Plaintiffs Paul Sayas and Benjamin Varo, on behalf of themselves and similarly situated individuals, respectfully request that this Honorable the Court enter judgment in their favor and against Defendant Biometric Impressions Corp. on Count IV as follows:

- A. Award Named Plaintiffs and the Class statutory damages of \$5,000 for each willful and/or reckless violation of BIPA pursuant to 740 ILCS 14/20(2), or, in the alternative, statutory damages of \$1,000 for each negligent violation of BIPA pursuant to 740 ILCS 14/20(1);
- B. Enjoin Defendant from committing further violations of BIPA as permitted by 740 ILCS 14/20(4);
- C. Award Named Plaintiffs and the Class all reasonable attorneys' fees and costs, including other litigation expenses, as provided by 740 ILCS 14/20(3);
- D. Award Named Plaintiffs incentive awards;

- E. Award Named Plaintiffs and the Class prejudgment interest; and,
- F. Any other relief this Court deems just and necessary.

**JURY DEMAND**

76. Plaintiffs demand a jury trial on all Counts.

Dated: January 7, 2022

Respectfully submitted,

By: /s/Bradley Levison  
One of Plaintiff and Class' Attorneys

Bradley Levison  
Elissa Hobfoll  
Herschman Levison Hobfoll PLLC  
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Cook County Attorney Code: 64134

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing instrument was electronically filed using Odyssey eFileIL with the Clerk of the Circuitry Court of Cook County, Illinois on **January 7, 2022** and thereafter a file stamped copy of the foregoing instrument was served electronically via Odyssey eFileIL on all counsel of record at the following e-mail addresses:

Jason Hunter (hunter@litchfieldcavo.com)  
Bryan Curry (curry@litchfieldcavo.com)  
Craig K. Kaplin (ckk@m2rlaw.com)

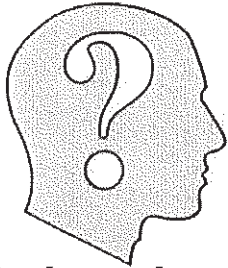
/s/ Bradley Levison  
**[X]Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct.**



# Biometric Impressions

"Striving to be the Leader of Fingerprinting Services"  
 Visit any of our multiple locations throughout Illinois  
 Phone: (630) 532-5922 | Fax: (888) 745-0247  
[www.biometricimpressions.com](http://www.biometricimpressions.com) | E-Mail: [info@biometricimpressions.com](mailto:info@biometricimpressions.com)

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Lic. # - 262.000039

Legal Name: Sayas Paul J  
Last First M. Initial

SSN: 530-78-7959 Date of Birth: 01/16/1976

Email: Pj.Sayas@gmail.com Telephone: (773) 301-8003

\*I, the undersigned, hereby authorize the release of any criminal history record information that may exist regarding me from any agency, organization, institution, or entity having such information on file. I am aware and understand that my fingerprints may be retained and will be used to check the criminal history record files of The Illinois State Police (ISP) and/or The Federal Bureau of Investigation (FBI).  
 \*\*In addition, I authorize my photo to be taken, submitted to ISP and/or FBI; Photographic images may be shared for licensing and employment purposes only. I further understand that I have the right to challenge any state or federal criminal history record information disseminated from these criminal justice agencies regarding me that may be inaccurate or incomplete.  
 \*\*\*Legal-Submitting fingerprints does not imply or guarantee employment with any agency nor does it imply or guarantee licensure. This service is a facilitator of the State of Illinois State Police.

Applicant Signature: [Signature] Date: 5/3/19

Purpose Code: RENEWAL O.R.I. #: 1552030Z

Applicant TCN #: LS11567L84298850

**OFFICIAL USE ONLY**

Date: 1/1 Technician: \_\_\_\_\_

**PAYMENT METHOD**

Cash  Check No. \_\_\_\_\_  Credit Card  Invoice

\$35.00

File Completed Date: \_\_\_\_\_ Notes: \_\_\_\_\_

**How are we doing? Let us know on:**



BioMetric Impressions



@biometimpress



BioMetric Impressions

**Return this portion to the facility that gave you this request form.**

Full Name: Paul J Sayas

Application Number: 1906934

On: 5/3/2019  
Date

In: Deerfield Vendor: Biometric Impressions  
City, State

TCN: LS11567L84298850

Morgan Gabriel  
(Technician's signature)

FILED DATE: 1/7/2022 10:34 AM 2020CH00201

I verify that the above information is true and correct.

Applicant Signature:  \_\_\_\_\_

TCN: LS11567L84298850

Requesting Facility: 1004824  
The Carrington at Lincolnwood  
Address: 3501 Northeast Parkway  
, IL 60712

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