

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law
Atlantic Station / 201 17th Street, NW / Suite 1700 / Atlanta, GA 30363
Tel: 404.322.6000 Fax: 404.322.6033
www.nelsonmullins.com

David F. Katz
Tel: 404.322.6122
Fax: 404.322.6033
David.Katz@nelsonmullins.com

January 21, 2014

Via Electronic Mail & Certified U.S. Postal Mail

The Honorable Joseph Foster
Office of the Attorney General of New Hampshire
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301
Email: doj-cpb@doj.nh.gov

Re: Data Breach Notification

Dear Attorney General Foster:

We write to inform you of a recent data security incident on behalf of our client, MilCo Enterprises, Inc., d/b/a EasyDraft ("EasyDraft"). In January, 2014, EasyDraft learned that a website, intended to be accessible only within a secured VPN and hosting files containing certain personal banking information, was publically available between October, 2012, and January, 2014. Upon learning of the incident on January 8, 2014, EasyDraft promptly shut down the website and took immediate steps to investigate the information that may have been accessed and the extent of any possible compromise of consumer information. Based on this investigation, EasyDraft has reason to believe that the following information was publicly available: 1) first and last name; 2) bank routing number; and 3) bank account number.

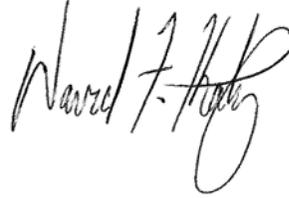
EasyDraft has determined that the breach of security described above may have affected the names and financial account numbers of thirty (30) residents in your state. Our client will provide written notification on January 22 by U.S. first class mail to all affected residents to the last address our client has on record, and a sample of this notification letter is enclosed.

Since the incident, EasyDraft has added additional monitoring on its production web servers using Silver Sky, a cloud monitoring and security provider. EasyDraft has also engaged an independent digital risk management firm to conduct a third-party review of the matter to fully understand this incident and to provide immediate recommendations to further secure information in EasyDraft's environment.

January 21, 2014
Page 2

Please do not hesitate to contact me at (404) 322-6122 if you have any questions or concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read "David F. Katz". The signature is written in a cursive style with a large, looping "K" at the end.

David F. Katz

DFK:dcl

Enclosure: Sample Consumer Notification Letter

CC: Dan Miller, President and Director of Sales and Marketing, MilCo Enterprises, Inc. (w/ *encl.*) (via *electronic mail*)
Steve Contino, Chief Operating Officer, MilCo Enterprises, Inc. (w/ *encl.*) (via *electronic mail*)



Your Solution to Innovative Payments
3730 Glen Lake Drive, Suite 100, Charlotte, NC 28208

<<Firstname>> <<Middlename>> <<Lastname>>

<<Date>> (Format: Month Day, Year)

<<Address1>>

<<Address2>>

<<City>>, <<Stateprovince>> <<Postalcode>>

<<Intelligent Mail Barcode>>

Dear <<Firstname>> <<Middlename>> <<Lastname>>,

MilCo Enterprises, Inc., doing business as EasyDraft (“EasyDraft” or “us” or “we”), is an ACH processing vendor of Bright Horizons Family Solutions (“Bright Horizons”). You are receiving this notification because you are a current or former customer of Bright Horizons, and we have recently discovered that the following personal information may have been compromised: first name, last name, bank account number, and bank routing number. This letter will explain how this compromise occurred, how you could potentially be affected, and what specific steps you may take in order to protect yourself from certain risks regarding any potential misuse of this information.

On January 8, 2014, Bright Horizons learned that one of EasyDraft’s internal websites was potentially accessible on the Internet. They immediately notified us, and that same day we immediately shut down the website so it could no longer be accessed externally. We and our external third party forensic team immediately conducted an investigation and determined that on October 8, 2012, the web server where the files were located was misconfigured, resulting in a lack of proper secure authentication requirements. No other customers of ours were impacted by this event. We are conducting a complete investigation to determine the precise period of time the information was available externally.

We are also devoting all necessary resources to our ongoing efforts to enhance our information security policies and procedures in light of this incident to minimize the risk of such incidents in the future. We have engaged independent forensic firms to conduct a third-party review of the matter to fully understand this incident and to provide immediate recommendations to further secure information in our environment.

We are notifying you so that you can take steps to help protect your information from unauthorized use, such as the steps detailed in the enclosed reference guide. We urge you to be vigilant about monitoring unauthorized account activity and to alert your bank and/or account issuers who may be able to impose additional security measures. We are also working with Kroll to provide you with services at no cost to you to help you safeguard your identity, including consultation and restoration services in the event of a potential identity theft.

What Are We Doing To Protect You?

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity theft safeguards at no cost to you for one (1) year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience when it comes to helping people who have sustained an unintentional exposure of confidential data.

Your identity theft safeguards include **Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Theft Insurance** and **Identity Theft Consultation and Restoration**. Please note that in order to activate the following services you will need to follow the instructions in the section titled “*How to Take Advantage of Your Identity Theft Protection Services*” below. Additional information describing your services are included with this letter.

your letter is continued on the next page ...

For more information or if you have any questions, please call **1-855-401-2644**, 8 a.m. to 5 p.m. (Central Time), Monday through Friday. Kroll's Licensed Investigators are standing by to answer your questions or help you with concerns you may have. *Please have your membership number ready.*

We sincerely apologize for any inconvenience this incident may cause you.

Sincerely,

Steve Contino
Chief Operating Officer
MilCo Enterprises, Inc.,
doing business as EasyDraft

How to Take Advantage of Your Identity Theft Protection Services

Membership Number: <<MEMBERSHIPNUMBER>>

Visit kroll.idMonitoringService.com and follow the online instructions to take advantage of your identity theft protection services. You can view your services at any time by logging onto Kroll's identity protection website. When you enroll, be prepared to provide the membership number above.

Help is only a phone call away.

If you have a question, need assistance, or feel you may be a victim of identity theft, **Call 1-855-401-2644**, 8 a.m. to 5 p.m. (Central Time), Monday through Friday, and ask to speak with an investigator.

Take advantage of this no-cost opportunity and let the experts at Kroll help you assess your situation and safeguard your identity.

Reference Guide

To protect against possible identity theft or other financial loss, we encourage you to remain vigilant, to review your account statements, to monitor your credit reports and to consider these additional steps:

Security Freeze. Some state laws allow you to place a security freeze on your credit reports. This would prohibit a credit reporting agency from releasing any information from your credit report without your written permission. You should be aware, however, that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing or other services. The specific costs and procedures for placing a security freeze vary by state law, but this reference guide provides general information. You can find additional information at the websites of any of the three credit reporting agencies listed below.

If you believe that you have been a victim of identity theft and you provide the credit reporting agency with a valid police report, it will not charge you to place, lift or remove a security freeze on your credit reports. In all other cases, a credit reporting agency may charge you up to \$5.00 (and in some cases, up to \$20.00) each time you place, temporarily lift, or permanently remove a security freeze.

Requirements vary by state, but generally to place a security freeze on your credit report, you must send a written request to each of the three credit reporting agencies noted below, which must include the following information: (1) Full name (including middle initial as well as Jr., Sr., II, III, etc.); (2) Social Security Number; (3) Date of birth; (4) Addresses for the prior five years; (5) Proof of current address; (6) A legible copy of a government issued identification card; (7) A copy of any relevant police report, investigative report, or complaint to a law enforcement agency concerning identity theft and (8) If you are not a victim of identity theft, include payment by check, money order, or credit card (Visa, MasterCard, American Express or Discover only). Do not send cash through the mail.

Equifax Security Freeze
P.O. Box 105788
Atlanta, Georgia 30348
877-478-7625
www.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, Texas 75013
888-397-3742
www.experian.com

TransUnion Fraud Victim Assistance Division
P.O. Box 6790
Fullerton, California 92834-6790
800-680-7289
www.transunion.com

Free Credit Reports. To order a free copy of your credit report, visit www.annualcreditreport.com, call toll-free at (877) 322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three national credit bureaus provide free annual credit reports only through the website, toll-free number or request form.

When you receive your credit report, review it carefully. Look for accounts you did not open. Look in the "inquiries" section for names of creditors from whom you haven't requested credit. Some companies bill under names other than their store or commercial names. The credit bureau will be able to tell you

when that is the case. Look in the "personal information" section for any inaccuracies in your information (such as home address and Social Security number). If you see anything you do not understand, call the credit bureau at the telephone number on the report. Errors in this information may be a warning sign of possible identity theft. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing.

Fraud Alerts. To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert alerts you of an attempt by an unauthorized person to open a new credit account in your name. When a merchant checks the credit history of someone applying for credit, the merchant gets a notice that the applicant may be the victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the applicant. You can place a free fraud alert on your credit report by calling any one of the toll-free fraud numbers provided below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three credit bureaus. You can also place a fraud alert on your credit report online at the websites listed below for Equifax and Experian and via email for TransUnion at fvad@transunion.com.

Equifax
P.O. Box 105069
Atlanta, Georgia 30348-5069
800-525-6285
www.fraudalerts.equifax.com

Experian
P.O. Box 1017
Allen, Texas 75013
888-397-3742
www.experian.com

TransUnion Fraud Victim Assistance Division
P.O. Box 6790
Fullerton, California 92834-6790
800-680-7289
www.transunion.com

Police Report. If you find suspicious activity on your credit reports or account statements, or have reason to believe that your personal information is being misused, contact your local law enforcement authorities immediately and file a police report. You have the right to request a copy of the police report and should retain it for further use, as many creditors want the information it contains to absolve you of potential fraudulent debts.

Consulting the FTC. In addition to your state Attorney General, you can contact the FTC to learn more about how to protect yourself from identity theft:

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/idtheft/

Take Advantage of Your Identity Theft Protection Services

You've been provided with access to services from Kroll, a global leader in risk mitigation. Over the past 14 years, Kroll has provided data breach response services for cases impacting more than 100 million individuals including personal consultation to more than 180,000 consumers and worked some 8,000 confirmed identity theft cases. When you need assistance, rest assured that your services are backed by an expert team who can answer any question you may have.

The following services are included in your **Essential Monitoring** package:



Kroll employs a team of experienced licensed investigators to provide you with expert, one-on-one assistance:

Consultation: You have unlimited access to consultation with a dedicated licensed investigator at Kroll. Support includes best practice tips to assist in ongoing protection, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Restoration: Kroll's restoration services are the most comprehensive of any provider. Should you become a victim of identity theft, a dedicated licensed investigator can work on your behalf to resolve related issues. The investigator does more than shoulder the bulk of the recovery; they can dig deep to uncover all aspects of the theft, and then work with creditors, collection agencies, utilities, government entities, and more ... to resolve it.



Credit Monitoring through TransUnion: Credit services can be a key tool in detecting early warning signs of identity theft. You'll receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll investigator, who can help you determine if it's an indicator of identity theft. You'll also receive "no activity" notices if there have been no changes to your data.



Web Watcher: Web Watcher helps to detect if your personal information is being bought and sold online. This program monitors hacker chat rooms, forums and other websites where criminals are known to trade stolen information. Thousands of sites are monitored, looking for matches to your personal information, such as Social Security, medical ID, and financial account numbers. If your information is found, you will be promptly alerted and provided with instructions to contact your investigator. Monitoring starts as soon as you enroll and select the information to search.

Your identity theft protection services are continued on back ...

How to Take Advantage of Your Identity Theft Protection Services

Visit kroll.idMonitoringService.com
and follow the online instructions to take advantage
of your identity theft protection services.

You can view your services at any time by logging onto Kroll's identity protection website. When you enroll, be prepared to provide the membership number included with the accompanying letter.

Help is only a phone call away.

If you have a question, need assistance, or feel you may be a victim of identity theft, call Kroll at 1-???-???-????, 8 a.m. to 5 p.m. (Central Time), Monday through Friday, and ask to speak with an investigator. Take advantage of this no-cost opportunity and let the experts at Kroll help you assess your situation and safeguard your identity.



Public Persona: Public Persona monitors public record databases for names, aliases and addresses that are associated with your Social Security number. Records include, among other data sources, property or deed registration, internet job site providers, state occupational license data, and court proceedings. If information is found, an alert email is sent. If you see a name, address or alias that is not associated with you, contact Kroll’s investigators for more information. Once you have enrolled, you can view the services at any time by logging onto Kroll’s identity protection website.



Quick Cash Scan: Quick Cash Scan monitors thousands of short-term and cash-advance loan sources, such as rent-to-own or payday lenders. These are sometimes referred to as “non-credit” loans because the application process does not always include a credit check, making it easier to use stolen or fraudulent identity information. You’ll receive an alert when a loan is reported, and you’ll have the option to call a Kroll investigator for more information.



\$1 Million Identity Theft Insurance: Reimburses you for out-of-pocket expenses totaling up to \$1 million in legal costs for any one stolen identity event. Additional benefits include a \$0 deductible and coverage for fees associated with replacing documents, traveling expenses, loss of income, child care and elderly care and fraudulent withdrawals. All coverage is subject to the conditions and exclusions in the policy.

State Notification Requirements

All States.

You may obtain a copy of your credit report or request information on how to place a fraud alert or security freeze by contacting any of the national credit bureaus below. It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

Equifax P.O. Box 740241 Atlanta, GA 30374 1-800-685-1111 www.equifax.com	Experian P.O. Box 2104 Allen, TX 75013 1-888-397-3742 www.experian.com	TransUnion P.O. Box 2000 Chester, PA 19022 1-800-888-4213 www.transunion.com
---	---	---

For residents of Massachusetts.

It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of Massachusetts and West Virginia.

You also have the right to place a security freeze on your credit report by contacting any of the credit bureaus listed at above. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent.

To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line or a written request. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address,

and the date of issue. The consumer reporting agency may charge a fee of up to \$5.00 to place a freeze or lift or remove a freeze and free if you are a victim of identity theft or the spouse of a victim of identity theft, and you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency.

For residents of Iowa, Maryland, Michigan, Missouri, North Carolina, Oregon, and West Virginia.

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account.

For residents of Iowa.

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon.

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

For residents of Maryland and North Carolina.

You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about steps you can take toward preventing identity theft.

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

North Carolina Office of the Attorney General
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Federal Trade Commission Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/bcp/edu/microsites/idtheft/