

# BakerHostetler

## Baker & Hostetler LLP

312 Walnut Street  
Suite 3200  
Cincinnati, OH 45202-4074

T 513.929.3400  
F 513.929.0303  
www.bakerlaw.com

February 14, 2013

### Via UPS

Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301  
Attn: Attorney General Michael A. Delaney

Craig A. Hoffman  
direct dial: 513.929.3491  
cahoffman@bakerlaw.com

*Re: Incident Notification*

Dear Attorney General Delaney:

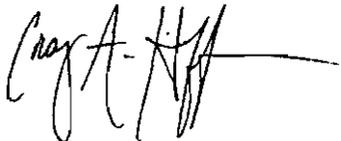
Our client, Capella University (“Capella”), during the week of January 28, 2013, determined that an employee in the collection department had recorded and sent the name, address, and credit card information of a small number of students to a personal e-mail account in violation of Capella policy.

As a precautionary measure, arrangements were made for individuals to enroll in a complimentary credit monitoring and identity theft protection service for one year provided by ProtectMyID Elite™ from ConsumerInfo.com, Inc., an Experian company.

To prevent something like this from happening in the future, Capella promptly took action by terminating the employee, removing the employee’s access to its networks, and further securing the records it maintains.

We are notifying approximately 1 New Hampshire resident. Notification is being sent to that resident in substantially the form attached hereto, with mailing commencing on February 15, 2013.

Sincerely,



Craig A. Hoffman

Enclosure

Chicago    Cincinnati    Cleveland    Columbus    Costa Mesa  
Denver    Houston    Los Angeles    New York    Orlando    Washington, DC

[Capella letterhead]

February xx, 2013

[first name] [last name]  
[street address]  
[city], [state] [zip code]

Dear [first name] [last name],

Capella University is committed to protecting the information it maintains on behalf of its learners. Regrettably, we are writing to inform you about an incident involving some of that information.

During the week of January 28, 2013, we determined that an employee in the collection department had recorded and sent the name, address, and credit card information of a small number of learners to a personal e-mail account in violation of Capella policy. Capella promptly took action by terminating the employee, removing the employee's access to our networks, and further securing the records we maintain.

While we do not know of any misuse of your information, out of an abundance of caution we encourage you to remain vigilant for signs of misuse by reviewing your financial account statements and monitoring free credit reports. In addition, we are offering a complimentary one-year membership in ProtectMyID<sup>®</sup> Alert from ConsumerInfo.com, Inc. an Experian company to provide you with credit monitoring capabilities and identity protection services focused on identification and resolution of identity theft. The program is completely free and enrolling will not hurt your credit score. For more information on the program and instructions on how to enroll, please see the next page of this letter.

Capella University apologizes for any inconvenience this may cause you. If you have any questions or concerns, please feel free to contact me directly at 612-977-5153.

Regards,

Todd R. Sorensen  
Senior Corporate Attorney  
612/977-5153

Enclosure

## Activate ProtectMyID Now in Three Easy Steps

1. ENSURE That You Enroll By: **May 31, 2013**
2. VISIT the **ProtectMyID Web Site: [www.protectmyid.com/redeem](http://www.protectmyid.com/redeem)** or call **877-371-7902 to enroll**
3. PROVIDE **Your Activation Code: [code]**

Once your ProtectMyID membership is activated, your credit report will be monitored daily for 50 leading indicators of identity theft. You'll receive timely Credit Alerts from ProtectMyID on any key changes in your credit report which could include new inquiries, new credit accounts, medical collections and changes to public records. You should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-371-7902.

ProtectMyID provides you with powerful identity protection that will help detect, protect and resolve potential identity theft. In the case that identity theft is detected, ProtectMyID will assign a dedicated U.S.-based Identity Theft Resolution Agent who will walk you through the process of fraud resolution from start to finish for seamless service.

We realize that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.

### **Your complimentary 12-month ProtectMyID membership includes:**

- **Credit Report:** A free copy of your Experian credit report
- **Daily 3 Bureau Credit Monitoring:** Alerts you of suspicious activity including new inquiries, newly opened accounts, delinquencies, or medical collections found on your Experian, Equifax® and TransUnion® credit reports.
- **Identity Theft Resolution:** If you have been a victim of identity theft, you will be assigned a dedicated, U.S.-based Experian Identity Theft Resolution Agent who will walk you through the fraud resolution process, from start to finish.
- **ExtendCARE:** Full access to the same personalized assistance from a highly-trained Fraud Resolution Agent even after your initial ProtectMyID membership expires.
- **\$1 Million Identity Theft Insurance<sup>1</sup>:** As a ProtectMyID member, you are immediately covered by a \$1 Million insurance policy that can help you cover certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.

---

<sup>1</sup> Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of Chartis, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-371-7902.

Even if you choose not to enroll in this program, we recommend you remain vigilant to the possibility of fraud and identity theft by reviewing your credit report and credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting companies. To order your credit report, free of charge once every 12 months, from each of the three major nationwide credit companies, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax	Experian	TransUnion
PO Box 740256	PO Box 9554	PO Box 6790
Atlanta, GA 30374	Allen, TX 75013	Fullerton, CA 92834
<a href="http://www.equifax.com">www.equifax.com</a>	<a href="http://www.experian.com">www.experian.com</a>	<a href="http://www.transunion.com">www.transunion.com</a>
1-800-525-6285	1-888-397-3742	1-800-680-7289

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

[Capella letterhead]

February xx, 2013

[first name] [last name]  
[street address]  
[city], [state] [zip code]

Dear [first name] [last name],

Capella University is committed to protecting the information it maintains on behalf of its learners. Regrettably, we are writing to inform you about an incident involving some of that information.

During the week of January 28, 2013, we determined that an employee in the collection department had recorded the name, address, and credit card information of a small number of learners, including you, in violation of Capella's policy. Capella promptly took action by terminating the employee, removing the employee's access to our networks, and further securing the records we maintain.

While we do not know of any misuse of your information, out of an abundance of caution we encourage you to remain vigilant for signs of misuse by reviewing your financial account statements and monitoring free credit reports. In addition, we are offering a complimentary one-year membership in ProtectMyID<sup>®</sup> Alert from ConsumerInfo.com, Inc. an Experian company to provide you with credit monitoring capabilities and identity protection services focused on identification and resolution of identity theft. The program is completely free and enrolling will not hurt your credit score. For more information on the program and instructions on how to enroll, please see the next page of this letter.

Capella University apologizes for any inconvenience this may cause you. If you have any questions or concerns, please feel free to contact me directly at 612-977-5153.

Regards,

Todd R. Sorensen  
Senior Corporate Attorney  
612/977-5153

Enclosure

## Activate ProtectMyID Now in Three Easy Steps

1. ENSURE That You Enroll By: **May 31, 2013**
2. VISIT the **ProtectMyID Web Site: [www.protectmyid.com/redeem](http://www.protectmyid.com/redeem)** or call **877-371-7902 to enroll**
3. PROVIDE Your Activation Code: [code]

Once your ProtectMyID membership is activated, your credit report will be monitored daily for 50 leading indicators of identity theft. You'll receive timely Credit Alerts from ProtectMyID on any key changes in your credit report which could include new inquiries, new credit accounts, medical collections and changes to public records. You should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-371-7902.

ProtectMyID provides you with powerful identity protection that will help detect, protect and resolve potential identity theft. In the case that identity theft is detected, ProtectMyID will assign a dedicated U.S.-based Identity Theft Resolution Agent who will walk you through the process of fraud resolution from start to finish for seamless service.

We realize that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.

### **Your complimentary 12-month ProtectMyID membership includes:**

- **Credit Report:** A free copy of your Experian credit report
- **Daily 3 Bureau Credit Monitoring:** Alerts you of suspicious activity including new inquiries, newly opened accounts, delinquencies, or medical collections found on your Experian, Equifax® and TransUnion® credit reports.
- **Identity Theft Resolution:** If you have been a victim of identity theft, you will be assigned a dedicated, U.S.-based Experian Identity Theft Resolution Agent who will walk you through the fraud resolution process, from start to finish.
- **ExtendCARE:** Full access to the same personalized assistance from a highly-trained Fraud Resolution Agent even after your initial ProtectMyID membership expires.
- **\$1 Million Identity Theft Insurance<sup>1</sup>:** As a ProtectMyID member, you are immediately covered by a \$1 Million insurance policy that can help you cover certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.

---

<sup>1</sup> Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of Chartis, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-371-7902.

Even if you choose not to enroll in this program, we recommend you remain vigilant to the possibility of fraud and identity theft by reviewing your credit report and credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting companies. To order your credit report, free of charge once every 12 months, from each of the three major nationwide credit companies, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax	Experian	TransUnion
PO Box 740256	PO Box 9554	PO Box 6790
Atlanta, GA 30374	Allen, TX 75013	Fullerton, CA 92834
<a href="http://www.equifax.com">www.equifax.com</a>	<a href="http://www.experian.com">www.experian.com</a>	<a href="http://www.transunion.com">www.transunion.com</a>
1-800-525-6285	1-888-397-3742	1-800-680-7289

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission and Maryland Attorney General is as follows (you can obtain information from these sources about preventing identity theft):

Federal Trade Commission	Office of the Attorney General
600 Pennsylvania Avenue, NW	200 St. Paul Place
Washington, DC 20580	Baltimore, MD 21202
<a href="http://www.ftc.gov">www.ftc.gov</a>	<a href="http://www.oag.state.md.us">www.oag.state.md.us</a>
1-877-438-4338	1-888-743-0023