



William B. Diaz
President
CS STARS
500 West Monroe Street
Chicago, IL 60661-3650
(312) 627-6809
bdiaz@csstars.com
www.csstars.com

June 2, 2009

Kelly A. Ayotte, Attorney General
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, New Hampshire 03301

Re: Notification of a Data Security Breach Situation

Dear Attorney General Ayotte:

We are writing to advise you of an incident involving personal information associated with 94 residents of the State of New Hampshire. CS STARS LLC provides medical bill review software and services relating to the processing of insurance claims for Constitution State Services, LLC and Travelers Indemnity Company and its property casualty subsidiary. On May 9, 2009, an unencrypted, portable hard drive was stolen from a CS STARS' employee as part of a series of thefts. We believe the hard drive contained certain personal information, including names and Social Security Numbers, belonging to claimants who were provided workers compensation-related insurance benefits. A police report was filed following discovery of the theft, and CS STARS promptly informed the information owner. The police have apprehended suspects, but the hard drive has not been recovered. CS STARS does not have knowledge or reason to believe that any information contained on the hard drive has been accessed or misused.

CS STARS takes privacy and information security seriously. In order to ensure that potentially affected individuals are able take immediate steps to protect themselves from possible identity theft or other damage, CS STARS, on behalf of itself and the information owner, will be alerting these individuals about the situation in the next few days. Kroll Inc. has been retained to provide toll-free access to Kroll's Consumer Solutions Center, along with credit monitoring services and identity restoration services at no cost to the potentially affected individuals. We will alert individuals to remain vigilant by reviewing account statements and monitoring free credit reports.

Kroll will provide access to a credit report to affected individuals who enroll for the service. In addition, the enrolled individual's credit file will be monitored for critical changes, including address changes, inquiries, new trade-lines, derogatory notices and appearance of certain public records. Individuals will be informed of such changes by either post or electronic mail. If the person suspects or discovers fraudulent activity, Kroll, among other things, will provide affected individuals with a toolkit of resources to address issues they encounter and, if permitted, will work on their behalf to restore their credit or identity. CS STARS will be re-training its employees on the proper use and storage of personal information to help ensure this situation is not repeated. CS STARS will also be notifying the appropriate regulators and three major credit reporting repositories (Experian, Equifax and TransUnion).

June 2, 2009
Kelly A. Ayotte, Attorney General
Office of the New Hampshire Attorney General

Please let us know if you have further questions or if we can be of further assistance.

Sincerely,

CS STARS LLC

By: 

Name: William B. Diaz

Title: CEO and President

Dear Mr./Ms. [name]:

We write to advise you of a potential compromise of personal information that may affect you. CS STARS LLC provides medical bill review software and services relating to a workers compensation claim filed by you with your employer. On May 9, 2009, a portable hard drive was stolen from a CS STARS' employee. We believe the hard drive contained certain personal information, including names and Social Security numbers, belonging to some claimants who were provided workers compensation-related insurance benefits by Constitution State Services, LLC, Travelers Indemnity Company and its property casualty subsidiary.

CS STARS sincerely apologizes for and regrets this situation.

Although CS STARS does not have knowledge or reason to believe that any information contained on the hard drive has been improperly accessed or misused, we wanted to make you aware of the incident and the steps we have taken to prevent a reoccurrence. First, a police report was filed following discovery of the theft, and CS STARS promptly informed the information owner. The police have apprehended suspects, but the hard drive has not been recovered. Second, CS STARS has notified state regulators, as appropriate, and the three national credit bureaus. Additionally, CS STARS will be re-training its employees on the proper use and storage of personal information.

CS STARS is committed to the protection of your privacy and personal information and, as such, we have retained Kroll Inc. to provide you with access to its ID TheftSmart™ service. This service includes Enhanced Identity Theft Restoration, Continuous Credit Monitoring and a Current Credit Report at no cost to you. ID TheftSmart is one of the most comprehensive programs available to help protect against identity theft. We urge you to take the time to read about the safeguards now available to you.

For online credit monitoring services, submit an online authorization at www.idintegrity.com. If you prefer to receive credit services through the mail, please fill out and return the enclosed *Consumer Credit Report and Credit Monitoring Authorization Form*. Note, however, that if you fill out and return the authorization form to receive credit services through the mail, you cannot sign up online.

For additional information, please see the attached document titled U.S. State Notification Requirements. This document contains information on how to contact the credit repositories (Experian, Equifax and TransUnion) on your own if you so choose.

If you have questions or feel you may have an identity theft issue, please call ID TheftSmart member services at 1-800-XXX-XXXX between 8:00 AM and 5:00 PM (Central Time), Monday through Friday. Again, CS STARS apologizes for this situation.

Sincerely,

Enclosures

U.S. State Notification Requirements

For residents of Hawaii, Iowa, Maryland, Michigan, North Carolina, Oregon, Vermont, Virginia, West Virginia, and Wyoming:

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. It is recommended by state law 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. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies:

Equifax

P.O. Box 740241
Atlanta, Georgia 30348
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 6790
Fullerton, CA 92834-6790
1-877-322-8228
www.transunion.com

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:

You can obtain information from the Maryland Office of the Attorney General and the Federal Trade Commission about steps you can take to avoid 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

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/

For residents of Massachusetts and West Virginia:

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. You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent; however, using a security freeze may delay your ability to obtain credit.

To place a security freeze on your credit report, you need to send a request to a consumer reporting agency by certified mail, overnight mail, or regular stamped mail. 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, unless 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.

Equifax Security Freeze

P.O. Box 105788
Atlanta, Georgia 30348
www.equifax.com

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
www.experian.com

TransUnion (FVAD)

P.O. Box 6790
Fullerton, CA 92834-6790
www.transunion.com



Consumer Credit Report and Credit Monitoring Authorization Form

Sam A. Sample
1234 AnyStreet
AnyCity, USA 12345-6789

974 123 456 789

Do not make any address changes to the top half of this authorization form.
Please use the Change of Address Request section below.

Personal Information

Social Security #: - -

Date of Birth: / /
m m d d y y y y

Telephone #: - -

Email Address: _____
(OPTIONAL)

Printed Name: _____
First Middle Initial Last

Signature

I authorize First Advantage Credco, provider of the credit report and credit file monitoring for ID TheftSmart, to obtain my consumer report/credit information from one or more of the three national credit repositories (Equifax, Experian, TransUnion).

Signature: _____

Current Date: / /
m m d d y y y y

Change of Address Request

Do not complete this section if your address printed above is correct.

Street Address: _____

Suite/Apt #: _____

City: _____

State: _____ ZIP Code: _____

Instructions

Step 1. Personal Information

Complete all of the personal information required using black or blue ink only. Please print clearly.

Step 2. Signature

Sign your name and date in the signature box.

Step 3. Verify Printed Address

Please verify that your address printed above is accurate.

If the address above is not your **residential** address, please provide your residential address in the box titled "Change of Address Request"

Step 4. Return Authorization Form

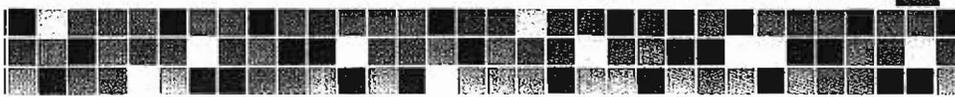
Return this completed form using the postage-paid return envelope we've supplied.

If you do not have your postage-paid return envelope, mail your authorization form to:

Plan Administrator
PO Box 14524
Des Moines, IA 50306-9332

Illinois Residents: Credit reporting agencies are required by law to give you a copy of your credit record upon request at no charge or for a nominal fee.

Consumers residing in the states of Colorado, Massachusetts, Maryland, New Jersey and Vermont may receive a free copy of their consumer credit report once per year, and residents of the state of Georgia may receive two copies per year.



ID TheftSmart

ID TheftSmart™

Quick, Correct Steps to Protect You

Your ID TheftSmart safeguards are designed to provide you the most comprehensive and effective identity theft detection, protection, and recovery services available.

When it comes to guiding people and companies through a security incident, ID TheftSmart has more experience than any other organization. We know what to do, who to call, and how to help. Using our thousands of hours of investigative work with consumers and decades of risk management, we've developed ID TheftSmart—a comprehensive series of safeguards to help protect you against identity theft.

If you have questions or feel you have an identity theft issue, call today and talk confidentially with a knowledgeable team member about your particular situation.

Restoration Service Exclusions

Legal Remedy. Any Stolen Identity Event where the victim is unwilling to prosecute the person who caused the victim to suffer the fraud or its consequences.

Dishonest Acts. Any dishonest, criminal, malicious, or fraudulent acts, if the Member(s) that suffered the fraud personally participated in, directed, or had knowledge of such acts.

Financial Loss. Membership Services do not cover any financial losses attributed to the Stolen Identity Event, including but not limited to, money stolen from a wallet, unauthorized purchases of retail goods, or services online, by phone, mail, or direct.

Pre-existing Stolen Identity Event Limitations. If either the victim had knowledge of, or reasonably should have had knowledge of, a pre-existing stolen identity event (not this one) based on information provided to them prior to enrollment in the program, such an event or the consequences caused by it are not covered.

Business. A covered stolen identity event does not include the theft or unauthorized or illegal use of their business name, DBA, or any other method of identifying their business activity.

Minors. Minors are fundamentally excluded given that (a) credit reporting agencies do not knowingly maintain credit files on minor children, and (b) minor children are unable to execute the Limited Power of Attorney (LPOA) required for certain processes as described herein. However, Kroff agrees to try to resolve identity theft issues for participant-minors through the processes listed in the master agreement, with additional reasonable efforts to address the challenges of working with minors, and within the solutions available through existing legislation and established industry and organizational procedures.



Helping



Millions of People



Enhanced Identity Theft Restoration

Restore Your Credit, Regain Your Peace of Mind

When it comes to guiding people and companies through a security incident, Kroll has more experience than any other organization. We provide full-service restoration, which means our experienced, Licensed Investigators do the bulk of the work on your behalf. And since one, dedicated investigator is assigned to your case, you won't have to explain your situation over and over again.

You now have easy access to the resources you need to fight back if you have been exposed to the threat of identity fraud. Our ID TheftSmart™ Licensed Investigators have thousands of hours of experience working in the laws, regulations, and investigative techniques used for credit and non-credit-related identity theft restoration.

You can rely on the expertise of this specialized team to help search out suspicious activity, and as necessary, fight back against the evolving tactics used by identity thieves.

Our in-depth investigations extend beyond credit issues, exploring:

- › Criminal data at federal and state levels;
- › State department of motor vehicles (DMV) records;
- › Public records, where liens or bankruptcies could surface;
- › Social Security tracing, for fraudulent address or status entries;
- › Certain 'watch lists' familiar to the security industry; and more.

Continuous Credit Monitoring

Early Detection is Key

Consumer agencies and government bodies alike recommend that you keep a close eye on your credit activity. Early detection is key to identifying fraud and the damage it can cause. Monitoring alerts make you aware of changes in your credit file that could indicate the kind of unauthorized activity commonly associated with identity theft and fraud.

You'll be notified by email when your credit files show certain credit activity in your name that's commonly associated with identity theft, such as applying for a new credit card or loan, a change of address, etc.

If the transaction isn't one you initiated, simply call ID TheftSmart toll-free and we'll immediately put you in touch with a licensed investigator to find out what's happening and correct the problem. We'll even send you "no activity" notices when there's been no activity in your credit file, so you always know your credit is closely monitored.

Current Credit Report

Verify Your Credit File is Accurate

Experts recommend you review your credit report regularly. Knowing the information in your credit file is an important step in detecting and safeguarding against identity fraud.

With ID TheftSmart, you will receive an up-to-date credit report from Experian to give you a detailed account of your credit activity. If you see any suspicious activity, ID TheftSmart specialists are readily available to review it with you, and to confirm inaccuracies that can affect your credit standing.

Simple Steps to Protect Your Identity

Follow the steps below to receive your free ID TheftSmart solutions

Start Continuous Credit Monitoring and View Your Current Credit Report
To receive your email alerts and view your credit report online, visit www.idintegrity.com. Please be prepared to provide your membership number. Instructions are provided online.

To receive your alerts and credit report through mail, fill out the enclosed *Consumer Credit Report and Credit Monitoring Authorization Form* and return in the enclosed postage-paid envelope.

