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Morgan Lewis
C O U N S E L O R S A T L A W

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November 19, 2009

Department of Justice
Consumer Protection Bureau
33 Capital Street
Concord, NH 03301

RE: Notice of Potential Data Breach Pursuant to NH Rev. Stat. § 359-C:20

To Whom It May Concern:

This Firm represents FCI USA, LLC in connection with a theft of one of its laptop computers used by one of its employees. We are writing to notify you of the incident, as information on the stolen laptop may have included personal information for a limited number of employees and former employees of FCI.

The incident occurred when a laptop computer belonging to FCI and being used by one of its employees was stolen. FCI has investigated the incident and believes that the laptop contained a spreadsheet including personal information including names, Social Security numbers, and dates of birth for approximately 2,000 individuals. However, we have no evidence that the information on the laptop has been used for fraudulent purposes.

FCI has taken the following actions:

1. The theft was reported to local authorities on September 25, 2009.
2. FCI promptly undertook measures to determine what personal information was on the laptop.
3. FCI is sending notification letters via first-class mail to any individual believed to have appeared on the spreadsheet in question. (A copy of the notification letter is enclosed).
4. FCI has undertaken measures to ensure that similar incidents do not occur in the future, including education of our employees regarding proper laptop and computer security measures.

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More details regarding the potential breach can be found in the attached letter being sent to the affected individuals this week. Approximately 671 residents of New Hampshire were affected by this incident and will receive the enclosed notification letter.

We are committed to maintaining and protecting the confidentiality of our employees' personal information. We regret that this situation has occurred and we will be working to reduce the risks of a similar situation happening in the future.

If you have any questions, please feel free to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read "K. Catherine Roney". The signature is fluid and cursive, with a large, sweeping flourish at the end.

K. Catherine Roney

Enclosure



Promotion Code: 503941620269

November 17, 2009

Re: Theft of Laptop Computer Containing Personal Information

We are writing to inform you that on September 24, 2009, one of our employees who uses a laptop computer supplied by the company had that computer stolen while traveling. We have no reason to believe that the thief intended to steal FCI files or had any interest other than illegally obtaining a valuable computer. While we have no reason to believe that any information on the computer has been accessed without authorization or will be used in any unauthorized way, we are writing to tell you what happened, what we have done to address the situation, and what you can do to protect your continued privacy.

We have attempted to determine exactly what information may have been on the stolen computer. Based on our investigation, we believe that a spreadsheet containing personal information including names, social security numbers, and dates of birth may have been electronically stored on the computer. We are writing this letter to all persons believed to appear on that spreadsheet to alert them to these facts.

What We Have Done

The theft of the computer was promptly reported to local police, and a police investigation is underway. Since the employee informed us of this event, we have been working to determine what happened so that we could take the proper steps. We are also working to prevent incidents like this from happening in the future, by improving security of company computers. In addition, we are working to implement encryption and password technology to prevent unauthorized access even if computers are stolen in the future.

We have arranged with Equifax Personal Solutions to help you protect your identity and your credit information at no cost to you. The steps to follow are:

1. Enroll in Equifax Credit Watch™ Gold identity theft protection product. This product is being provided to you at no cost for one year.
2. Additionally, you may choose to adopt an increased level of protection by placing a fraud alert on your credit file at Equifax and the other two credit reporting agencies

What You Can Do

Enroll in Equifax Credit Watch™ Gold

Equifax Credit Watch will provide you with an “early warning system” to changes to your credit file and help you to understand the content of your Equifax credit file. The key features and benefits are listed below.

Equifax Credit Watch provides you with the following benefits:

- Comprehensive credit file monitoring and automated alerts of key changes to your Equifax credit report
- Wireless alerts and customizable alerts available
- Access to your Equifax Credit Report™
- \$25,000 in identity theft insurance with \$0 deductible, at no additional cost to you †
- 24 by 7 live agent Customer Service to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance and in initiating an investigation of inaccurate information.
- 90 day Fraud Alert placement with automatic renewal functionality (available online only)

How to Enroll

To sign up online for **online delivery** go to www.myservices.equifax.com/gold

1. Consumer Information: complete the form with your contact information (name, address and e-mail address) and click “Continue” button. The information is provided in a secured environment.
2. Identity Verification: complete the form with your Social Security Number, date of birth, telephone #s, create a User Name and Password, agree to the Terms of Use and click “Continue” button. The system will ask you questions about your credit report that only you should know. Please note that on December 6, 2009, the Promotion Code field will be added to this page and you will need to enter your code in the box provided.
3. Payment Information: During the “check out” process, enter the promotion code, provided at the top of your letter, in the “Enter Promotion Code” box. After entering your code press the “Apply Code” button (which will zero out the price) and then the “Submit Order” button at the bottom of the page. (This code eliminates the need to provide a credit card number for payment.)
4. Order Confirmation: – Click “View My Product” to access your Equifax Credit Report.

-OR-

To sign up for US Mail delivery, dial 1-866-937-8432 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.

1. Promotion Code: You will be asked to enter your promotion code as provided at the top of your letter.
2. Customer Information: You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.
3. Permissible Purpose: You will be asked to provide Equifax with your permission to access your credit file and to monitor your file. Without your agreement, Equifax can not process your enrollment.
4. Order Confirmation: Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your

We are committed to maintaining the privacy of the personal information you entrust to us. We apologize for any inconvenience or concern this incident may cause. If we can be of any further assistance or answer any questions, or you encounter any problems that you believe to be related to this incident please call 1-800-222-2194 extension 7162.

Sincerely,



Susan J. Stopa
Corporate Vice President, Compensation & Benefits

† Insurance underwritten by member companies of American International Group, Inc. The description herein is a summary only. It does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for complete details of coverage and exclusions.

This product is not intended for minors (under 18 years of age).

Reference Guide

In the event that you ever suspect that you are a victim of identity theft, we encourage you to consider taking the following steps:

Contact the Federal Trade Commission. You can contact the Federal Trade Commission's Consumer Response Center at 600 Pennsylvania Avenue, NW, Washington, DC, 20580 or at <http://www.ftc.gov/bcp/menus/business/data.shtm>, to obtain more information about steps you can take to avoid identity theft.

Order Your Free Credit Report. To order your free 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 website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. Do not contact the three credit bureaus individually. They provide free annual credit reports only through the website or toll-free number.

When you receive your credit report, review the entire report carefully. Look for any inaccuracies and/or accounts you don't recognize, and notify the credit bureaus as soon as possible in the event there are any.

Place a Fraud Alert on Your Credit File: To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect you against the possibility of an identity thief opening new credit accounts 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 a victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the applicant. You can report potential identity theft to all three of the major credit bureaus by calling any one of the toll-free fraud numbers below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three bureaus.

Equifax	P.O. Box 740241 Atlanta, Georgia 30374-0241	877-478-7625	www.equifax.com
Experian	P.O. Box 9532 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

Place a Security Freeze on Your Credit File. You may wish to place a "security freeze" on your credit file. A security freeze generally will prevent creditors from accessing your credit file at the three nationwide credit bureaus without your consent. You can request a security freeze by contacting the credit bureaus at:

Equifax	P.O. Box 105788 Atlanta, Georgia 30348	www.equifax.com
Experian	P.O. Box 9554 Allen, Texas 75013	www.experian.com
TransUnion	Fraud Victim Assistance Division P.O. Box 6790 Fullerton, California 92834-6790	www.transunion.com

The credit bureaus may charge a reasonable fee to place a freeze on your account, and may require that you provide proper identification prior to honoring your request. Placing a security freeze on your credit file may delay, interfere with, or prevent timely approval of any requests you make for credit, loans, employment, housing or other services. For more information regarding credit freezes, please contact the credit reporting agencies directly.

Contact the U.S. Federal Trade Commission. If you detect any incident of identity theft or fraud, promptly report the incident to your local law enforcement authorities, your state Attorney General and the Federal Trade Commission (“FTC”). If you believe your identity has been stolen, the FTC recommends that you take these additional steps.

- Close the accounts that you have confirmed or believe have been tampered with or opened fraudulently. Use the FTC’s ID Theft Affidavit (available at www.ftc.gov/idtheft) when you dispute new unauthorized accounts.
- File a local police report. Obtain a copy of the police report and submit it to your creditors and any others that may require proof of the identity theft crime.

You can learn more about how to protect yourself from becoming an identity theft victim or by contacting the FTC:

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)

For Maryland Residents: You can obtain information from the Maryland Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the Maryland Attorney General at:

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

For Massachusetts Residents: You have a right to request from us a copy of any police report filed in connection with this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For North Carolina Residents: You can obtain information from the North Carolina Office of the Attorney General about steps you can take to help prevent identity theft. You can contact Attorney General Roy Cooper’s Consumer Hotline toll-free within North Carolina at 1-877-5-NO-SCAM.