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May 29, 2012

Consumer Protection and Antitrust Bureau
New Hampshire Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notification of Possible Data Security Breach per RSA 359-C:20

To whom it may concern:

Primex is a public entity risk pool providing coverage and related loss prevention services to New Hampshire political subdivisions in the areas of workers compensation, property and liability, unemployment compensation and health. Primex operates from its principal place of business at 46 Donovan Street in Concord, New Hampshire. In addition to providing in-house claims management services, Primex occasionally engages vendors to provide specialized services in the administration of one or more coverage programs.

By letter dated May 3, 2012, the bankruptcy trustee for debtor Impairment Resources, LLC, notified Primex of a possible data security breach that may have compromised personal identifying and medical information of as many as 14,000 workers compensation and automobile liability insurance claimants throughout the nation. The debtor's office in San Diego, California, was allegedly burglarized on December 31, 2011, and among the items stolen was an external drive and back-up tape containing some of debtor's business records.

Primex could find no evidence of a relationship to Impairment Resources, LLC. Primex, however, in the past has engaged a vendor named Brigham & Associates, which is reportedly a predecessor entity to Impairment Resources, LLC. Brigham and Associates, through an affiliated physician, provided Primex with independent medical examinations of approximately 55 workers compensation claimants.

Neither the debtor nor the trustee could confirm that any information related to any of the 55 Primex claimants was on the tape and external drive that were stolen. Primex has been informed that the stolen back-up tape cannot be accessed without the tape drive that operates it. The tape drive was reportedly not stolen from the debtor. Information on the external drive reportedly cannot be read without restoration of the operating system, which the debtor maintains would require information technology experience and a working knowledge of back-up systems.

The debtor believes the theft was random, and it states that it has no evidence that any personal information has been accessed, viewed or used by others. Consistent with the foregoing, attached please find a letter drafted by the debtor explaining the circumstances surrounding the theft.

Primex believes the debtor did not sooner notify it of this situation due to the police investigation and the debtor's bankruptcy process. Primex, upon receipt of the trustee's letter, took immediate steps to determine if there was sufficient information justifying action on its part under RSA 359-C:20.

Primex can neither confirm nor rule out the theft and misuse of information relating to approximately 55 of its prior workers compensation claimants. Primex, therefore, intends to issue these persons notification of the potential security breach in accordance with RSA 359-C:20, on or before June 10, 2012.

Should your Office have any questions or concerns relative to this notification, please contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Ricker". The signature is fluid and cursive, with a large, stylized initial "M" and "R".

Michael A. Ricker
General Counsel

We are aware of the laws requiring individual breach notification and we are willing to make the necessary notification(s) at your request. Since we do not store the individuals' addresses associated with the cases in electronic files, we do not have the contact information necessary to provide written notice to the affected individual(s). If you would like us to report the incident to these individual(s), we would need you to provide us with their contact information, including their mailing address, in electronic form. We have attached a sample notification letter that we will use to notify the individual(s).

Please let us know to whom we should send the list of the individuals who require notice. Notice is required to these individual(s) promptly, so please respond as soon as possible, but no later than February 22, 2012 advising whether you will notify the individuals or whether you would like us to do so. Please send the written notice to Impairment Resources, P.O. Box 880839, San Diego, CA 92168-0839 or via email at impairmentresources@impairment.com.

If we received the case from any other party connected with this claim, such as the lawyer, carrier, or third party administrator, at the time of the referral, we have also notified them of this incident.

We apologize for any inconvenience you experience as a result of this random theft. Please be assured we have reviewed our procedures and have strengthened our processes based on this review. If you have questions about this incident, please do not hesitate to call me at 888-262-0571 to discuss this incident.

Sincerely,



Julie Osborn
Chief Operating Officer