

# STARLING INSURANCE

## AND ASSOCIATES

March 5, 2008

Office of the Attorney General  
Attorney General Kelly A. Ayotte  
33 Capital Street  
Concord, NH 03301

Dear Attorney General Ayotte:

We write to inform you of a recent data security incident in which a server was stolen from our locked office.

After reconstructing the data that was on the server it was determined that it contained the personal information of residents of your state. The information varies for different individuals, but may have included one or more of the following data elements: name, address, social security number and driver's license number.

We continue in our efforts to determine the exact number of individuals affected by this incident and will notify all affected residents of your state once they are identified. We are providing notification to all affected individuals by sending the attached letter which offers them the opportunity to enroll in Equifax's Credit Watch™ Gold with 3-in-1 Monitoring identity theft protection service free of charge for two years.

We have notified law enforcement and are cooperating with them to investigate this theft. In light of this incident, we will be taking additional steps to further protect the privacy of individuals' information.

Please do not hesitate to contact me at 1-719-632-4723 if you have questions.

Very truly yours,



Ray Starling  
President

719.632-4723 Main  
719-632-1939 Fax

1515 S. Tejon St. Ste. 303  
Colorado Springs, CO 80906

800-530-8488 Toll Free  
[ray@starlinginsurance.com](mailto:ray@starlinginsurance.com) Email  
[www.starlinginsurance.com](http://www.starlinginsurance.com) Web

---

Securities and Advisory Services offered through Woodbury Financial Services, Member NASD/SIPC P.O. Box 64284  
St. Paul, MN 55164 800-800-2000

Woodbury Financial Services and Starling Insurance & Assoc., Inc. are not affiliated companies.

March 5, 2008

[Insert Name field here]  
[Insert Street Address field here]  
[Insert City, State, and Zip Code fields here]

Dear [Insert Name field here]:

I am writing to share with you some important information regarding a recent incident that involves your personal information. Recently, a server containing our client information was stolen from our locked office. We have reconstructed the data that was on the server and have discovered that it contained personal information including your name, address, and Social Security number.

We have notified law enforcement and are cooperating with them to investigate this theft. In order to address your concerns about this incident, we are offering you the opportunity to enroll, at no cost to you, in Equifax Credit Watch™ Gold with 3-in-1 Monitoring identity theft protection service for a two-year period. This service provides comprehensive credit file monitoring, unlimited access to your Equifax credit report, and around-the-clock, live customer service. Equifax Credit Watch™ is one of the most comprehensive programs available to help protect your name and credit against identity theft.

With this letter, we are enclosing an information sheet detailing the identity theft protection services being offered to you and information about how to register with Equifax Credit Watch™. Your promotional code to access Equifax is [Insert Promotional Code field here], which you will need to reference when you enroll. You have a period of 90 days from the date of this letter to activate your Equifax services using the provided promotional code.

If you have additional questions, or feel you may have an identity theft issue, please call 1-800-800-2000, extension 13180, the toll-free hotline designated to respond to any concerns you may have.

Starling Insurance & Associates takes the stewardship of your personal data very seriously. We regret this incident and apologize for any inconvenience this has caused.

Sincerely,

Ray Starling  
President  
Starling Insurance & Associates

Enclosures

## WHAT WE ARE PROVIDING YOU

At no cost to you, we are providing you with the opportunity to enroll in Equifax Credit Watch™ Gold with 3-in-1 Monitoring. This credit file monitoring product provides daily notification of changes to your credit reports at all three major credit reporting agencies, access to your credit reports, identity theft insurance, and around-the-clock, live customer service for a two-year period. Equifax Credit Watch Gold is one of the most comprehensive programs available to help protect your name and credit against identity theft and has been offered by many other companies, government agencies, and organizations involved in similar incidents.

If you have questions, you may call 1-800-800-2000, extension 13180, and you will be directed to a person who can address your questions regarding this incident.

## ADDITIONAL IMPORTANT INFORMATION

### **Options for Enrolling With Equifax:**

#### **A. Online**

Equifax has a simple Internet-based verification and enrollment process. Visit [www.myservices.equifax.com/tri](http://www.myservices.equifax.com/tri) to fill out the electronic form.

1. **Consumer Information:** Complete the form with your contact information (name, address, and email 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, and telephone number(s). Then create a User Name and Password, agree to the Terms of Use, and click "Continue" button. The system will ask you up to two security questions to verify your identity.
3. **Payment Information:** During the "check out" process, provide the promotional code found in the preceding cover letter. After entering your code, press the "Apply Code" button, 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 3-in-1 Credit Report and other product features.

#### **B. Enroll by phone for delivery by US Mail**

To sign up for US Mail delivery of the product, 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 shown above (no spaces, no dash)
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 identity) or a Customer Care letter with further instructions (if your identity can not be verified using the information provided).

### **Reviewing Your Credit Report:**

#### **A. Order Your Credit Report**

Under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three major credit reporting companies – Equifax, Experian, and TransUnion. You may obtain a free copy of your credit report from each of them by visiting [www.AnnualCreditReport.com](http://www.AnnualCreditReport.com) or by calling 1-877-FACT ACT (1-877-322-8228). If you would rather write, a request form is available online at [www.AnnualCreditReport.com](http://www.AnnualCreditReport.com). You may want to obtain copies of your credit reports to ensure the accuracy of the report information.

#### **B. Review Your Credit Reports for Accuracy**

When you receive your credit reports, look them over carefully for items such as accounts you did not open; inquiries from creditors that you did not initiate; and personal information such as home, address, and Social Security number that are not accurate, etc. Even if you do not find any signs of fraud on your reports, you may want to continue to check your credit report every three months for the next year. If you see anything that looks suspicious, or that you do not understand, call the credit agency at the telephone number on the report.

If you see any information that is suspicious, we recommend that you:

- a. **Contact Law Enforcement and Retain a Copy of the Police Report If You Decide to File One.** Call your local police department or visit the station, and an officer will take a report. We also suggest that you obtain a copy of the police report as you may need to give copies of the police report to creditors to clear up your records.
  - i. You should also consider filing a complaint with the Federal Trade Commission (“FTC”) by visiting their website [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft) or by calling 1-877-ID-THEFT. Your complaint will be added to the FTC’s Identity Theft Data Clearinghouse where it will be accessible by law enforcement throughout the country for use in their investigations.
- b. Contact any of the three major credit bureaus and ask that they place a “fraud alert” on your credit report.

### **C. Placing a Fraud Alert**

A fraud alert informs potential creditors to contact you before opening new accounts. You may place a fraud alert on your credit file by contacting any of the three consumer reporting agencies. The three major credit reporting companies are:

Equifax  
1-877-478-7625  
[www.equifax.com](http://www.equifax.com)

Experian  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion  
1-800-680-7289  
[www.transunion.com](http://www.transunion.com)

To learn more about ID theft and how to deter, detect and defend against it, visit:  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
[www.usdoj.gov/criminal/fraud/idtheft.html](http://www.usdoj.gov/criminal/fraud/idtheft.html)  
[www.idtheftcenter.org](http://www.idtheftcenter.org)

### **Maryland Residents:**

Maryland residents are encouraged to contact the Maryland Consumer Hotline at 1-888-743-0023 if they have any questions about this communication. They can also contact the Department of Consumer Protection via email: [consumer@oag.state.md.us](mailto:consumer@oag.state.md.us), or in writing at:

Office of the Attorney General  
200 St. Paul Place  
Baltimore, MD 21202

### **Massachusetts Residents:**

Massachusetts residents who suspect that they are the victims of identity theft should file a police report and have the right to place a security freeze on our accounts. To obtain a security freeze send a written request to each of the credit bureaus at the addresses below by regular, certified or overnight mail and include name, address, date of birth, social security number, and credit card number and expiration date for payment, if applicable. If you are a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift or remove a security freeze. In all other cases, a credit reporting agency may charge up to \$5 each to place, lift or remove a security freeze.

Equifax Security  
Freeze  
P.O. Box 105788  
Atlanta, Georgia 30348

Experian Security  
Freeze  
P.O. Box 9554  
Allen, TX 75013

TransUnion  
Fraud Victim Assistance Dept.  
1561 E. Orangethorpe Ave.  
Fullerton, CA 92831

## FREQUENTLY ASKED QUESTIONS

Q. *Is there a company contact through whom I can verify this letter actually came from Starling Insurance & Associates?*

A. You can call Starling Insurance & Associates at 1-719-632-4723 or 1-800-530-8488.

Q. *What personal information of mine may be on the server?*

A. The server contained names, addresses, and Social Security numbers, dates of birth, and account information.

Q. *Why is Starling Insurance & Associates contacting me about this issue?*

A. Starling Insurance & Associates takes very seriously the trust you have placed in us to keep your personal information confidential. We have an obligation to inform you of the situation and what we are doing to protect you from any potential risk of identify theft. We have contacted Equifax, a global leader in effectively dealing with the loss of personal information, to provide you with its Equifax Credit Watch™ Gold with 3-in-1 Monitoring service for two full years at no cost, should you wish to participate.

Q. *What happens after a two years?*

A. We believe that a two-year plan to monitor your credit is important to provide you with full protection from this incident. We will vigilantly monitor for any activity that might suggest the illegal use of the data. If new information surfaces, we will reassess the situation.

Q. *Why can't I be enrolled with Equifax automatically through Starling Insurance & Associates?*

A. The decision to enroll in the Equifax service is a personal one. It would not be appropriate for Starling Insurance & Associates to enroll individuals automatically without their expressed consent. For more details on how to enroll, please see the enclosed information sheet.

Q. *What if I suspect that I am the victim of identity theft?*

A. Once enrolled in the Equifax program, if you believe you are the victim of identity theft due to this server incident, Equifax will conduct a thorough investigation and, upon verification, will make restoration services available to you. For more details on Equifax, please see the enclosed information sheet.

Q. *What is being done to prevent this from occurring again?*

A. Starling Insurance & Associates had procedures in place to protect customer data including password protection and off-site backup and will be considering additional security measures such as server encryption to protect customer data.