

January 10, 2007

**TOWERS  
PERRIN**

Office of the Attorney General  
Consumer Protection and Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301  
FAX (603) 223-6202

Re: Legal Notice of Information Security Breach Pursuant to N.H. Rev. Stat.  
Ann. § 359-C:20(i)(b)

To Whom it May Concern:

Towers Perrin provides consulting services to the Altria Group, Inc. ("Altria"). As you are aware, New Hampshire state law requires notice to the New Hampshire Attorney General's Office in the event of an information security breach involving the personal information of New Hampshire residents. In accordance with that requirement, we write to inform you, on behalf of Altria, of an information security breach that Towers Perrin discovered on December 1, 2006 concerning Altria employees or former employees' personal data that we maintained.

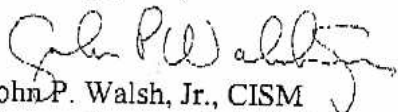
On that date we learned that a laptop had been stolen from our offices in Manhattan containing such information. The laptop was not encrypted, but the laptop and the email program were separately password protected. We have no information indicating the information has been misused. We reported the theft to the New York City Police Department (Mid-town South Precinct). The police report number is 2006-014-17855. Subsequently the District Attorney's Office for the County of New York requested that we delay notifying affected individuals until January 5, 2007.

We estimate that 17 New Hampshire residents related to Altria were affected by this incident. Pursuant to legal obligations, we are in the process of notifying all affected customers of the possible information security breach via written letter to each affected customer through first class mail, postage prepaid, which in accordance with the law enforcement request, began on January 5, 2007. For your convenience, a copy of the notice being sent to consumers is enclosed with this letter.

The notices describe (1) the general nature of the incident resulting in the potential information security breach, (2) the type of personal information that was the subject of the possible security breach, (3) the precautionary measures Towers Perrin is taking to help protect personal information from further unauthorized access, (4) contact information for inquiries regarding the incident, (5) how to enroll in Equifax's credit monitoring service, which Towers Perrin is making available to affected individuals free of charge for one year; and (6) advice to our customers that they should also consider placing an initial fraud alert on their credit files and that they review account statements and monitor free credit reports that are available to them.

If you have any questions or need further information regarding this incident, please do not hesitate to contact us.

Sincerely yours,



John P. Walsh, Jr., CISM

Towers Perrin - Chief Information Security Officer

Enclosure



**TOWERS  
PERRIN**

January 2007

RE: IMPORTANT NOTICE

Dear

Towers Perrin provides benefits and pension consulting services to the Altria family of companies. In some cases, to perform our services, we have access to some of your personal information. On December 1, 2006, we learned that a laptop containing information about you, including your name and Social Security number, had been stolen from Towers Perrin's offices. We deeply regret that this situation occurred and are keenly aware of how important your personal information is to you. We have no reason to believe that your information has been misused. Even so, we want to inform you of the situation and suggest some steps you can take to protect yourself from identity theft now and in the future. We also promptly reported the theft to law enforcement authorities, who subsequently requested that we delay this notification until January 2007 to avoid any possible impediment to their investigation.

We take seriously our commitment to safeguarding confidential information entrusted to us by our clients, like your personal information. All of our laptops and email accounts are password-protected, and some files are password-protected as well. You may rest assured that we are carefully reviewing this incident and are working with Altria to strive to ensure that it does not happen again. Because of this incident, we have accelerated a project we already had underway to encrypt all our laptops by the end of January 2007. In addition, we have engaged an information security consulting firm to review our policies and procedures in the context of this incident to help us assess our areas of vulnerability, target areas for improvement and implement necessary changes.

#### **Precautions You Can Take**

Although we have no knowledge of any misuse of your information, we have arranged for you to enroll, at your option, in the **Equifax Credit Watch™ Gold with 3-in-1 credit monitoring product at no cost to you for one year.** The product will provide you with an early warning system for changes to your credit file and help you to understand the content of your credit file at the three credit reporting agencies. To enroll in this product, go to Equifax's website at [www.myservices.equifax.com/tri](http://www.myservices.equifax.com/tri) and complete the enrollment process. During the "check out" process, provide the following promotional code: «CODE» in the "Enter Promotion Code" box. Alternately, you may enroll in the U.S. Mail version of the product by completing and sending the enclosed form by mail or via fax to Equifax at the phone number or address shown on the form.

Once you have enrolled, the Equifax Credit Watch™ Gold with 3-in-1 credit monitoring product will provide you with several valuable services including:

- Credit file monitoring of your Equifax, Experian, and TransUnion credit reports;
- Automatic notification of key changes to your credit files from any of the three agencies;
- Free 3-in-1 Credit Report and unlimited Equifax Credit Reports™; and
- 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 to help you initiate an investigation of inaccurate information.

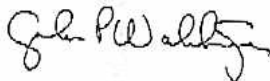
You may also want to consider placing an initial fraud alert on your credit file, which stays on your credit report for 90 days. You can do so by contacting one of the three credit reporting agencies listed below. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. As soon as one credit reporting company confirms your fraud alert, the others are notified to place a similar alert. When you place this alert on your credit report, you will receive information about ordering one free credit report from each of the credit bureaus.

- Equifax: 877-478-7625 [www.equifax.com](http://www.equifax.com); PO Box 740241, Atlanta GA, 30374-0241
- Experian: 888-397-3742 [www.experian.com](http://www.experian.com); PO Box 9532, Allen TX 75013
- TransUnion: 800-680-7289 [www.transunion.com](http://www.transunion.com); Fraud Victim Assistance Division, PO Box 6790, Fullerton CA 92834-6790

Once you receive your reports, we urge you to review them carefully for inquiries from companies you did not contact, accounts you did not open, and debts on your accounts that you cannot explain. Verify the accuracy of your Social Security number, address(es), complete name and employer(s). Notify the credit bureaus if any information is incorrect. You should also be similarly vigilant in monitoring any consumer accounts you have for suspicious activity. Be sure to report suspected identity theft to the credit bureaus, to the company maintaining any compromised account and to the proper authorities. To learn more about how to protect yourself from identity theft, please visit [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft) or call the Federal Trade Commission hotline phone number: 1-877-IDTHEFT (438-4338).

Again, we apologize for any inconvenience or concerns this incident may cause. We are committed to assisting you in protecting yourself. If you have any questions or need additional information, you may contact our information hotline at 800-788-2795.

Sincerely,



John P. Walsh, Jr. CISM  
Towers Perrin – Chief Information Security Officer

DEC-29-2006 16:23

MANHATTAN DA OFFICE

1212 335 9280 P.02/02

**DISTRICT ATTORNEY**

OF THE:

**COUNTY OF NEW YORK**

**ONE HOGAN PLACE**

New York, N. Y. 10013

(212) 335-9000



**ROBERT M. MORGENTHAU**  
DISTRICT ATTORNEY

December 29, 2006

Karen M. Allen  
Towers Perrin  
Managing Counsel - Intellectual Property  
1500 Market Street, Centre Square East  
Philadelphia, PA 19102

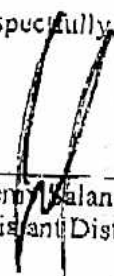
Ms. Allen:

As you are aware, the New York County District Attorney's Office is currently conducting an investigation into the theft of five laptop computers taken from your Manhattan office located at 335 Madison Avenue.

As previously discussed, the loss of the data contained on the computers triggers notification requirements under the laws of many states including New York. However, these statutes specifically allow for a delay of such notification if such delay is requested by law enforcement. Due to a recent arrest and the progression of the investigation into the loss of computers and personal identification information, I ask that you delay the notification process until January 5, 2005. This delay will ensure that the notification does not impede our investigation or progress.

Thank you for assistance and cooperation in this matter.

Respectfully,

  
\_\_\_\_\_  
Jeremy Waland  
Assistant District Attorney

MANHATTAN DA OFFICE

Fax:12123359602

Dec 21 2006 17:30

P.02

**DISTRICT ATTORNEY**

OF THE

**COUNTY OF NEW YORK**

**ONE HOGAN PLACE**

**New York, N. Y. 10013**

**(212) 335-9000**



**ROBERT M. MORGENTHAU**  
District Attorney

December 21, 2006

Karen M. Allen  
Towers Perrin  
Managing Counsel – Intellectual Property  
1500 Market Street, Centre Square East  
Philadelphia, PA 19102

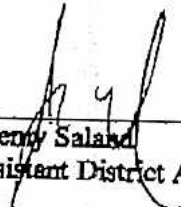
Ms. Allen:

The New York County District Attorney's Office is currently conducting an investigation into the theft of five laptop computers taken from your Manhattan office located at 335 Madison Avenue.

We are informed that these computers contained sensitive client data including personal identifying information. As you are aware, the loss of this type of data triggers notification requirements under the laws of many states including New York. However, these statutes also specifically allows for a delay of such notification if such delay is requested by law enforcement. Notifying the owners of the personal identifying information regarding the loss of their data at this time could impede our investigation into the theft of the laptops in question. Therefore, we are requesting that you delay notification of this incident until January 1, 2007. This delay will ensure that the notification does not compromise our investigation.

Thank you for assistance and cooperation in this matter.

Respectfully,

  
\_\_\_\_\_  
Jeremy Saland  
Assistant District Attorney