Baker Hostetler

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February 21, 2012

Office of the Attorney General
33 Capitol Street
Concord, NH 03301
Attn: Attorney General Michael A. Delaney

Re: Incident Notification

Dear Attorney General Delaney:

Our client, Trident University, is an online university that serves the needs of a highly-motivated adult learner student population, with diverse professional backgrounds and experiences. On November 29, 2011, Trident detected an unsuccessful attempt by an unidentified person to access a database containing usernames and passwords for current and former student accounts. No other information was contained in that database.

Trident permanently removed the database from the network and engaged an external forensic team to assess the nature of the incident. The investigation did not find any evidence that someone successfully obtained access to the database, and, based on a review of the available log-in history for November and December 2011, there was no unusual log-in activity to indicate inappropriate access to student accounts. Not only is there no evidence that any student's information was accessed by an unauthorized person, Trident is not aware of any reports that student account information has been misused as a result of the incident.

However, because student accounts contain names, addresses, dates of birth, and often Social Security numbers, Trident is notifying all students whose username and password were in the targeted database and offering them one year of free credit monitoring through TransUnion.

As a result of this incident, Trident implemented a new firewall as a complement to its existing firewalls and is working towards masking the Social Security numbers stored in students' accounts, which will be completed shortly.

There are approximately 115 New Hampshire residents that had a Social Security number in their student account. We are notifying a total of 240 New Hampshire residents. Notification will be sent to those residents on February 22, 2012 in substantially the forms attached hereto.

Very truly yours,

Theodore J. Kobus, III

Enclosures

TRIDENT UNIVERSITY
INTERNATIONAL

February 21, 2012

SS81873VSN-0123456
SAMPLE A SAMPLE
123 ANY ST
APT ABC
ANYTOWN, PA 12345

Dear Sample A Company:

For almost 14 years, Trident University has been serving the needs of a highly-motivated adult learner student population, with diverse professional backgrounds and experiences, including many current and former members of the "military family." As an online university, we are committed to securing the privacy and confidentiality of the personal information provided to us as well as taking appropriate steps when faced with a real or potential security breach. Regrettably, we are writing to inform you of an unidentified person's attempt to gain access to student account log-in information.

On November 29, 2011, we detected an unsuccessful attempt by an unidentified person to access one of our databases containing username and passwords for approximately 81,000 current and former student accounts. No other information was contained in that database. Trident University permanently removed the database from the network and engaged an external forensic team to assess the nature of the incident.

Our investigation did not find any evidence that someone successfully obtained access to the database. Based on a review of the available log-in history for November and December 2011, we have found no unusual log-in activity to indicate that student accounts were inappropriately accessed. However, we want to make you aware of this incident because if your student account was accessed, that account contained your name, address, Social Security number, and date of birth. As a result of this incident, we are implementing a new firewall as a complement to our existing firewalls and working towards masking the Social Security numbers stored in students' accounts, which will be completed in the very near future.

Again, there is no evidence that any student's information was accessed by an unauthorized person, and we are not aware of any reports that student account information has been misused as a result of the incident. However, in an abundance of caution, we strongly recommend you reset your password at https://cnsss.trident.edu/public/forgotpass.php. Additionally, we have arranged for you to enroll, at no cost to you, in an online three-bureau credit monitoring service for one (1) year provided by TransUnion, one of the three major nationwide credit reporting companies. To enroll in this free service, go to the TransUnion Monitoring website at www.transunionmonitoring.com and in the space referenced as "Activation Code", enter the following 12-letter Activation Code XXXXXXXXXXXX and follow the simple steps to receive your services online within minutes.

(OVER PLEASE)

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, three bureau credit monitoring service, please call the TransUnion Fraud Response Service hotline at [redacted] Monday through Friday, 9:00 a.m. to 7:00 p.m. Eastern time (closed on all U.S. observed holidays). Please enter or say the following six-digit telephone pass code [redacted] when prompted. You can sign up for the online or offline credit monitoring service anytime between now and May 31, 2012. Unfortunately, due to privacy laws, we cannot register you directly.

Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score. The daily 3-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion, Experian, and Equifax, including fraudulent activity, new inquiries, new accounts, new public record, late payments, change of address and more. The service also includes up to $25,000 in identity theft insurance with no deductible. (Certain policy limitations and exclusions may apply.)

Even if you choose not to take advantage of this free credit monitoring service, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit report and credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report once every 12 months, free of charge, from each of the three nationwide credit reporting companies below. To order your annual free report please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax	Experian	TransUnion
PO Box 740241	PO Box 9554	PO Box 6790
Atlanta, GA 30374	Allen, TX 7501	Fullerton, CA 92834
www.equifax.com	www.experian.com	www.transunion.com
1-800-525-6285	1-888-397-3742	1-800-680-7289

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the attorney general's office in your home state. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
www.ftc.gov
1-877-438-4338

You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records.

(NEXT PAGE PLEASE)

We want to assure you that we are taking this matter very seriously and have conducted a comprehensive internal review of our systems and procedures to further secure our network and individual systems against emerging malware threats. If you have any questions, please call [redacted] Monday through Friday, 9:00 a.m. to 7:00 p.m. Eastern time and enter or say the following six-digit telephone pass code [redacted] when prompted.

Sincerely,

Lucille Sansing

Lucille H. Sansing, Ph.D.
President and Chief Executive Officer

TRIDENT UNIVERSITY INTERNATIONAL

February 21, 2012

SS81873VSN-0123456 T-
SAMPLE A SAMPLE
123 ANY ST
APT ABC
ANYTOWN, PA 12345

Dear Sample A Sample:

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On November 29, 2011, we detected an unsuccessful attempt by an unidentified person to access one of our databases containing username and passwords for approximately 81,000 current and former student accounts. No other information was contained in that database. Trident University permanently removed the database from the network, administratively reset all inactive student account passwords, and engaged an external forensic team to assess the nature of the incident.

Our investigation did not find any evidence that someone successfully obtained access to the database. Based on a review of the available log-in history for November and December 2011, we have found no unusual log-in activity to indicate that student accounts were inappropriately accessed. However, we want to make you aware of this incident because if your student account was accessed, that account contained your name, address, Social Security number, and date of birth. As a result of this incident, we are implementing a new firewall as a complement to our existing firewalls and working towards masking the Social Security numbers stored in students' accounts, which will be completed in the very near future.

Again, there is no evidence that any student's information was accessed by an unauthorized person, and we are not aware of any reports that student account information has been misused as a result of the incident. Additionally, we have arranged for you to enroll, at no cost to you, in an online three-bureau credit monitoring service for one (1) year provided by TransUnion, one of the three major nationwide credit reporting companies. To enroll in this free service, go to the TransUnion Monitoring website at www.transunionmonitoring.com and in the space referenced as "Activation Code", enter the following **12-letter Activation Code** and follow the simple steps to receive your services online within minutes.

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Even if you choose not to take advantage of this free credit monitoring service, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit report and credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, once every 12 months, free of charge, from each of the three nationwide credit reporting companies below. To order your annual free report please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

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Sincerely,

Lucille Sansing

Lucille H. Sansing, Ph.D.
President and Chief Executive Officer

TRIDENT UNIVERSITY
INTERNATIONAL

February 21, 2012

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Sincerely,

Lucille Sansing

Lucille H. Sansing, Ph.D.
President and Chief Executive Officer

TRIDENT UNIVERSITY
INTERNATIONAL

February 21, 2012

81678ISN-0123456 T-
SAMPLE A SAMPLE
123 ANY ST
APT ABC
ANYTOWN, PA 12345

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Lucille H. Sansing, Ph.D.
President and Chief Executive Officer