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From Timothy P. Tobin

Sender's Voice Number 202.416.6870

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Main Fax Number 202.416.6899

To: CSCIC

Fax No.: (518) 474-9090

Company:

Voice No.:

To: CPB

Fax No.: (518) 474-2474

Company:

Voice No.:

To: Attorney General, Asst. AG in Charge

Fax No.: (212) 416-6003

Company: Bur. of Cons. Frauds

Voice No.:

Message

On behalf of John Walsh at Towers Perrin.

Confidentiality Note: This message is confidential and intended only for the use of the addressee(s) named above. It may contain legally privileged material. Dissemination, distribution or copying of this message, other than by such addressee(s), is strictly prohibited. If you have received this message in error, please immediately notify us by telephone and return the original to us at the address above. We will reimburse you for the cost of the telephone call and postage. Thank you.

Reporting Form
For Business, Individual or NY State Entity reporting a
“Breach of the Security of the System”
Pursuant to the Information Security Breach
and Notification Act (General Business Law § 889-aa;
State Technology Law § 208)

Name of Business, Individual or State Entity: Citigroup
Date of Discovery of Breach: Citigroup vendor, Towers Perrin,
discovered breach at Towers Perrin’s office on
12/1/06; Towers Perrin notified Citigroup
on 1/2/07
Estimated Number of Affected Individuals: Approximately 3,334 New York residents
Date of Notification to Affected Individuals: Began mailing on January 24, 2007
Manner of Notification: written notice
 electronic notice (email)
 telephone notice

Are you requesting substitute notice? Yes No (if yes, attach justification)

Content of Notification to Affected Individuals: Describe what happened in general terms and what kind of information was involved. Please attach copy of Notice.

On December 1, 2006, Towers Perrin, an Citigroup vendor, learned that laptops containing personal information belonging to its clients had been stolen from Towers Perrin’s offices. One of the laptops contained personal information, including names and social security numbers of Citigroup employees and former employees. The laptop was not encrypted, but the laptop and the email program were separately password protected. We have no information indicating that personal data has been misused. Towers Perrin reported the theft to the New York City Police Department (Mid-Town South Precinct) on December 7, 2006. The police report number is 2006-014-17855. Subsequently, the District Attorney’s Office for the County of New York requested that notification to affected individuals be delayed until January 5, 2007. Attached is a copy of the notice to affected individuals.

Name of Business or Individual Contact Person: John Walsh, of Towers Perrin, on
behalf of Citigroup
Title: Chief Information Security Officer
Telephone number: 215-246-7654
Email: john.walsh@towersperrin.com

Dated: 1/25/07
Submitted by: John Walsh, CISM of Towers Perrin, on behalf of Citigroup
Title: Chief Information Security Officer
Towers Perrin
Address: 1500 Market Street
Philadelphia, PA 19102
Email: john.walsh@towersperrin.com
Telephone: 215-246-7654
Fax: 215-246-4463

PLEASE SUBMIT THIS FORM TO ALL THREE (3) STATE AGENCIES as follows:

Fax this form to the Office of Cyber Security & Critical Infrastructure Coordination (CSCIC) & Consumer Protection Board (CPB):

CSCIC:
Security Breach Notification-
fax: 518-474-9090

CPB:
Security Breach Notification-
fax: 518-474-2474

and also **Fax & Mail** this form to

Attorney General:
Asst. AG in Charge
Bur. of Cons. Frauds
120 Broadway – 3rd Floor
New York, NY 10271
Fax No: 212-416-6003



**TOWERS
PERRIN**

January 2007

RE: IMPORTANT NOTICE

Dear

Towers Perrin provides management consulting services to Citigroup for your pension and/or retiree medical plans that at times require access to certain personal data. On December 1, 2006, we learned that laptops containing some of your personal information, including your name and Social Security number, had been stolen from Towers Perrin's offices. We promptly reported the theft to law enforcement authorities, who subsequently requested that we delay notification of affected individuals until January 2007 to avoid impeding their investigation.

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. However, we want to inform you of the situation and suggest some steps you can take to protect your personal information from possible misuse.

We take seriously our commitment to safeguarding confidential information entrusted to us by our clients. All of our laptops and email accounts are password-protected, and some files are password-protected as well. We assure you that we are carefully reviewing this incident and are working with Citigroup to take whatever measures are necessary to ensure that it does not happen again, including encrypting our laptops. 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 possible areas of vulnerability, target areas for improvement and implement necessary changes.

Precautions You Can Take

Although we have no reason to believe your information has been tampered with, we have arranged for you to enroll, at your option, in the **Equifax Credit Watch™ Gold with 3-in-1 credit monitoring product for two years at no cost to you.** 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 and complete the enrollment process. During the "check out" process, provide the following promotional code: «CODE» in the "Enter Promotion Code" box. *(Case sensitive, include the dash, no spaces before or after the code.)* 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.

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 copies of your Equifax Credit Report™;
- For those residing outside New York, \$20,000 in identity theft protection with \$0 deductible (subject to the terms, limitations and exclusions of the policy)¹; 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.

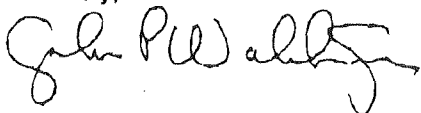
You may also want to consider placing an initial fraud alert on your credit file, which stays on your credit report for 90 days. You can do so by contacting one of the three credit reporting agencies listed below. A fraud alert tells creditors to contact you before they open any new accounts or change 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; PO Box 740241, Atlanta GA 30374-0241
- Experian: 888-397-3742 www.experian.com; PO Box 9532, Allen TX 75013
- TransUnion: 800-680-7289 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 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

¹ Identity FraudExpense Reimbursement Master Policy underwritten by Travelers Casualty and Surety Company of America and its property casualty affiliates, Hartford, CT 06183. Coverage for all claims or losses depends on actual policy provisions. Availability of coverage can depend on our underwriting qualifications and state regulations. Coverage not available for residents of New York.
Equifax's credit monitoring products are protected by US Patent 7,208,052