

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

3050 K. STREET, N.W.

SUITE 400

WASHINGTON, D.C. 20007

(202) 342-8400

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(202) 342-8451

www.kelleydrye.com

NEW YORK, NY
TYSONS CORNER, VA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES
MUMBAI, INDIA

December 22, 2008

Office of the Attorney General
McCormack Building
One Ashburton Place
Boston, MA 02108

Office of Consumer Affairs & Business Regulation
10 Park Plaza, Suite 5170
Boston, MA 02116

Re: Information Security Notification

To whom it may concern:

Pursuant to your state's law, the Seibels Bruce Group, Inc. is notifying you of an information security incident involving the personal information of approximately 3 Massachusetts residents.

The Seibels Bruce Group, Inc. and its subsidiaries ("Seibels Bruce") provide various identity verification and related services to insurance companies who use our services during the process of granting and servicing insurance policies. In mid-December, we became aware that certain personal records that we use for these business purposes were accessed improperly by an unauthorized third party. We promptly detected the issue, and took a number of measures to secure our systems.

To Whom It May Concern
December 22, 2008
Page Two

The company has drafted written notice of the breach that it will be sending to the affected individuals imminently. *See Attached.* The notice explains the occurrence, provides the individuals with a telephone number to reach Seibels Bruce if they have questions about the occurrence, and provides information about how they can protect themselves against identity theft, including instructions on how to obtain and review their free credit report. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alysa Z. Hutnik', with a long, sweeping horizontal stroke at the end.

Alysa Z. Hutnik



MICHAEL A. CULBERTSON
PRESIDENT

803.748.2000

800.525.8835

DIRECT PHONE: 803.748.2666

FAX: 803.748.2839

[Date]

[Placeholder for consumer's address]

[Placeholder, City, ST ZIP]

Re: Security-Related Notice

Dear [CONSUMER NAME]:

We are sending you this letter as a cautionary measure because we believe that certain information about you may have been improperly accessed.

What Happened:

The Seibels Bruce Group, Inc. and its subsidiaries ("Seibels Bruce") provide various identity verification and related services to insurance companies who use our services during the process of granting and servicing insurance policies. In mid-December, we became aware that certain personal records that we use for these business purposes were accessed improperly by an unauthorized third party. We promptly detected the issue, and took a number of measures to secure our systems. We are sending you this letter because we confirmed that, during this brief period of time, your records (which may have contained your name, address, telephone number, Social Security number, and/or date of birth) were accessed by an unauthorized third party.

Steps You Can Take To Reduce Your Risk of Identity Theft:

1. Reviewing Your Financial Accounts For Unusual Activity

While we have received no information at this time indicating that your personal information has been used in an improper manner, it is a good practice for you to review your financial account statements closely for any suspicious activity. If you notice any suspicious transactions on your account statements or other suspicious activity involving your account, please report it immediately to the appropriate financial institution and to your local police and file a police report of identity theft. Make sure to get a copy of the police report. You may need to give a copy of the report to creditors to clear up your records.

2. Review Your Free Credit Report

You also are entitled by law to ask for a free copy of your credit report from each of the three credit reporting companies – Equifax, Experian, and TransUnion – once every 12 months. To keep an eye on the accuracy and completeness of the information in your reports, we recommend that you stagger your requests from each of the reporting companies over the next 12 months. To obtain your free credit report:

- Go to www.annualcreditreport.com;
- Call the toll-free number 877-322-8228; or

- Complete the Annual Credit Report Request Form (available at www.ftc.gov/bcp/online/include/requestformfinal.pdf) and mail it to:

Annual Credit Report Request Service
P.O. Box 105281
Atlanta, GA 30348-5281

When you receive your credit report, look it over carefully. Look for accounts you did not open and inquiries from creditors that you did not initiate. If you see anything you do not understand call the credit agency at the telephone number provided on the report. Another helpful resource is the Federal Trade Commission's identity theft website at <http://onguardonline.gov/idtheft.html> or by calling 1-877-IDTHEFT. The Federal Trade Commission can assist victims and potential victims in dealing with the threat of identity theft.

3. Placing a Fraud Alert

You also may wish to place a "fraud alert" on your credit files by contacting any of the three national consumer reporting agencies. A fraud alert means that creditors should take additional steps to verify the identity of anyone who applies for credit in your name, and should also reduce the possibility of identity theft. There is no charge for placing a fraud alert on your consumer credit files. This option may, however, cause a delay if you intend to open up new credit accounts. You may place a fraud alert by contacting any of the credit reporting companies, toll free or through their website: Experian at (888) 397-3742 or www.experian.com; Equifax at (888) 766-0008 or www.equifax.com; and TransUnion at (800) 680-7289 or www.transunion.com.

4. Placing a Security Freeze

You also have the option of placing a "security freeze" on your credit files. A security freeze (also referred to as a credit freeze) is designed to prevent credit, loans, and services from being approved in your name without your consent. **However, using a security freeze may delay your ability to obtain credit because it prevents your credit file from being shared with potential creditors, insurance companies, or employers doing background checks.** You may request that a freeze be placed on your consumer report by sending a request to a credit reporting agency by certified mail, overnight mail, or regular stamped mail to the address below.

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
www.equifax.com
(800) 685-1111

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
www.experian.com
(888) 397-3742

TransUnion (FVAD)
P.O. Box 6790
Fullerton, CA 92834-6790
www.transunion.com
(888) 909-8872

When requesting a security freeze, be prepared to submit the following information: full name; Social Security number; full date of birth; current address and previous addresses for the past two years; and applicable fee (if any) or incident report or complaint with a law enforcement agency or the Department of Motor Vehicles. The request also should include a copy of a government-issued identification card (e.g., a driver's license, state or military ID card), and a copy of a utility bill, bank, or insurance statement. Each copy should be legible, display your name and current mailing address, and the date of issue (statement dates must be recent). The consumer reporting agency may charge a reasonable fee to place a freeze or to lift or

remove a freeze, unless you are a victim of identity theft or the spouse of a victim of identity theft, and have submitted a valid police report relating to the identity theft to the consumer reporting company.

* * *

Finally, if you have additional questions related to this situation, you can contact us between the hours of 8:15 a.m. ET through 5:00 p.m. ET Monday through Friday through our dedicated toll-free information helpline at 1-877-734-2357. We are committed to taking appropriate steps to protect your confidential information.

Like you, we take this matter very seriously. We deeply regret any inconvenience or concern that this matter may cause you.

Sincerely,

Michael A. Culbertson
President
The Seibels Bruce Group, Inc.

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ALYSA ZELTZER HUTNIK

DIRECT LINE: (202) 342-8603

EMAIL: ahutnik@kelleydrye.com

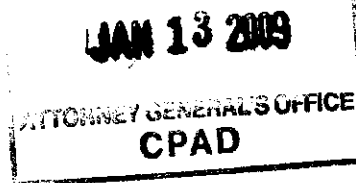
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TYSONS CORNER, VA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ
BRUSSELS, BELGIUM

AFFILIATE OFFICES
MUMBAI, INDIA

January 12, 2009

VIA OVERNIGHT DELIVERY

Shannon Choy-Seymour, Esq.
Assistant Attorney General
Office of the Attorney General
Consumer Protection Division
One Ashburton Place
Boston, MA 02108



Re: The Seibels Bruce Group, Inc.

Dear Ms. Choy-Seymour:

Thank you for speaking with me earlier this week concerning your letter, dated December 29, 2008, regarding the data security notification sent by The Seibels Bruce Group, Inc. Following our discussion, the company resent its notification letter to the affected Massachusetts residents with the updated language concerning the \$5 credit reporting agency fee. Enclosed is a copy of that updated notification letter for your files.

Please let me know if you have any questions.

Sincerely,

Alysa Z. Hutnik

Enclosure

MICHAEL A. CULBERTSON
PRESIDENT

803.748.2000
800.525.8835
DIRECT PHONE: 803.748.2666
FAX: 803.748.2839

January 8, 2009

[Placeholder for consumer's address]
[Placeholder, City, ST ZIP]

Re: Security-Related Notice

Dear [CONSUMER NAME]:

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Fullerton, CA 92834-
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www.transunion.com
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* * *

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President
The Seibels Bruce Group, Inc.