

GEORGE JEPSEN
ATTORNEY GENERAL



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Office of the Attorney General
State of Connecticut

February 5, 2015

Sent via First-Class Mail

Joseph Swedish
President and Chief Executive Officer
Anthem Inc.
120 Monument Circle
Indianapolis, IN 46204

RE: Anthem, Inc. Data Breach

Dear Mr. Swedish:

I am deeply concerned by the revelation of a massive data breach involving Anthem Inc.'s employees and enrollees. Based on early reporting, this breach appears to be of historic scale, impacting as many as 80 million records of current and former customers, as well as employees. Alarming, it appears that the breach compromised protected health information ("PHI") and private personal and financial information ("PI"), such as names, addresses, dates of birth, phone numbers, social security numbers, and income information.

Given the possible impact on consumers in Connecticut and elsewhere, my office is requesting detailed information on how this breach occurred, what steps have been taken to protect the affected individuals, and what new procedures have been adopted to prevent future breaches.

Please provide information responsive to the following questions by March 4, 2015. While some of this information may presently be unknown or under investigation, it is imperative to the protection of Connecticut residents that I better understand the circumstances of this breach as they are known today. I understand that you are currently working with law enforcement to investigate this matter. I am sensitive to the need to avoid any potential interference with a criminal investigation. To the extent that a law enforcement agency believes your response to this letter may impede an on-going criminal investigation, please alert my office immediately, including by identifying the agency making the request.

1. Please describe the facts and circumstances of the breach, including a detailed timeline of events leading to the discovery of the breach, any vulnerability exploited in connection with the breach, and Anthem's efforts to investigate and mitigate thereafter.
2. Please identify the information about consumers subject to the breach, including, but not limited to, the categories of information and the specific data points that comprise each category.
3. Please identify, broken down by state of residence, the total number of individuals affected by this incident.
4. Please describe the technological, administrative and physical safeguards that were in place to protect the information compromised in this breach from unauthorized access or acquisition including, but not limited to, encryption, perimeter controls, firewalls and outbound data traffic monitoring.
5. Please state whether Anthem is aware of any fraudulent activity regarding any compromised information, including, but not limited to, identity theft and medical identity theft, and if so provide details thereof.
6. Please identify any additional safeguards, both adopted and contemplated that have been or are to be taken in an effort to prevent future breaches of consumer information.
7. Please provide a copy of any and all compliance materials, both public and non-public, regarding compliance with Health Insurance Portability and Accountability Act of 1996, the Health Information Technology for Economic and Clinical Health (HITECH) Act and all regulations promulgated thereunder. Such materials include risk assessments, penetration test, post-breach harm analyses, and employee training and sanction policies and materials.
8. Please provide a copy of Anthem's Privacy Policy(ies), both current and as made available to consumers at all relevant times prior to this breach.
9. Please provide copies of any materials disseminated during the five years preceding the breach to customers and employees concerning, or making representations about, the security of their personal data in Anthem's possession.
10. Please provide a copy of any internal or third party investigative report or audit performed by or for Anthem relative to this breach.

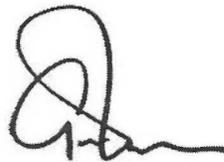
11. Please identify when notices of this breach will be sent to affected individuals and provide a copy of such notice.

This is the latest in a disconcerting trend of cases in which PHI and PI has been subjected to unauthorized access. Breaches in security like this one put innocent consumers at significant risk of financial and other harm, and those affected deserve adequate protection. At the very least, Anthem should immediately provide **two (2) years** of credit monitoring services, with appropriate identity theft insurance and restoration services, to the affected individuals, as well as allow them to place a "security freeze" on their credit reports, and thaw the freezes, at Anthem's expense. At our requests, private companies involved in recent data breaches have offered these protections to affected individuals. Anthem should do no less.

These preliminary protections, of course, are entirely separate from any potential enforcement actions or other relief that my office may seek after its investigation is complete. We reserve all of our rights in that regard.

I appreciate your cooperation in this matter and look forward to hearing from you. The information requested herein should be sent to Assistant Attorney General Matthew Fitzsimmons at 110 Sherman Street, Hartford, Connecticut 06105. Should you have any questions, you may contact AAG Fitzsimmons at (860) 808-5400. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "G. Jepsen", with a stylized flourish at the end.

GEORGE JEPSEN