

State of Connecticut

GEORGE C. JEPSEN
ATTORNEY GENERAL



Hartford

February 27, 2015

Gerry P. Smith
Executive Vice President
Lenovo
1009 Think Place
Morrisville, NC 27560

RE: Superfish software

Dear Mr. Smith:

I write concerning the recent reports that Lenovo sold certain models of personal computers pre-installed with a software program – Superfish Visual Discovery – that tracks users' web searching and browsing activity in order to place additional ads on the sites they visit.

These alarming revelations raise concerns that Lenovo may have seriously undermined computer users' online security and privacy. Technical experts quoted in news accounts indicate that the Superfish software potentially facilitates the ability of hackers to access users' computers.

Reports also indicate that the software resides in the lowest level of the computers' operating system making it difficult to detect or remove by common antivirus products and techniques. It also appears that Lenovo failed to apprise purchasers of computers that they had sold them computers pre-loaded with Superfish. Indeed, Lenovo's chief technology officer, Peter Hortensius, is quoted as acknowledging that the company "messed up badly."

In order for us to determine if Lenovo's conduct constituted violations of Connecticut law that prohibits unfair or deceptive trade practices, we ask that you provide the following information:

1. Please identify the number of Lenovo personal computers containing the Superfish software sold in the United States;
2. Please identify the dates on which Lenovo personal computers containing the Superfish software were sold;
3. Please identify the number of Connecticut residents who registered computers which had or may have had Superfish software installed;

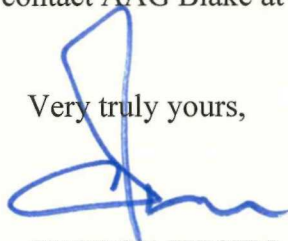
4. Please identify any other information about the number of computers with Superfish software sold or shipped to Connecticut residents;
5. Please identify all agreements and/or contracts between Lenovo and Superfish pertaining to the software;
6. Please identify all communications between Lenovo and Superfish pertaining to the software;
7. Please identify all internal communications pertaining to the Superfish software;
8. Please identify all information you received from the party with whom you arranged to start using Superfish software about how it worked and what it did;
9. Please identify and describe all independent testing and investigation you performed or had performed regarding how Superfish software worked and what it did;
10. Please identify all financial arrangements between you and the entity with whom you agreed to use Superfish software; and
11. Please describe what remedial measures Lenovo has taken or intends to take subsequent to its decision to cease selling personal computers with the Superfish software.

Along with the responses, please provide us with copies of any documents identified in your responses and any other documents that support the responses.

We ask that you provide the requested data within twenty (20) days of the date of this letter. Please forward this information via email to Assistant Attorney General Jonathan Blake at jonathan.blake@ct.gov, or to his attention at the following address: Office of the Attorney General, 110 Sherman St. Hartford, CT, 06105-2294.

Should you have any questions, please contact AAG Blake at (860) 808-5400. We look forward to your response.

Very truly yours,



GEORGE JEPSEN
ATTORNEY GENERAL

cc: Jonathan J. Blake, AAG
Matthew F. Fitzsimmons, AAG

State of Connecticut

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ATTORNEY GENERAL



Hartford

February 27, 2015

Mr. Adi Pinhas
Chief Executive Officer
Superfish
2595 E. Bayshore Road, # 150
Palo Alto, CA 94303

RE: Lenovo/Superfish software

Dear Mr. Pinhas:

I write concerning Lenovo's recent acknowledgement that it had been pre-installing a certain Superfish software package (the "Superfish Software") on certain models of personal computers.

These revelations raise serious online security and privacy concerns. Security experts quoted in the media indicate that the Superfish Software compromises the security of consumers' personal computers and could potentially expose them to unauthorized access from hackers. Further, reports indicate that the software resides in the lowest level of the computers' operating system, where it cannot be detected by ordinary means by consumers or by antivirus products.

It is difficult to understand what consumer benefit, if any, the Superfish Software provides, particularly given the reported risks it poses to consumers. The fact that the software was pre-installed on devices without informing consumers, and in a manner that apparently inhibits detection, is deeply disturbing.

In order for me to determine if this conduct violates Connecticut consumer protection law, please provide the following information:

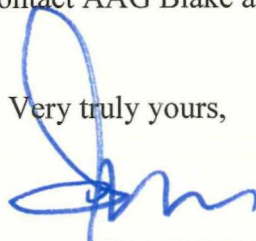
1. Please identify all agreements and/or contracts between Superfish and Lenovo pertaining to the Superfish Software;
2. Please identify all communications between Superfish and Lenovo pertaining to the Superfish Software;
3. Please identify all internal communications pertaining to the Superfish Software and it being pre-installed within any device, including Lenovo devices;

4. Please state whether any other entities pre-install(ed) Superfish Software within their devices;
5. If the answer to the previous question is yes, then please identify the entities and all agreements and/or contracts with such entities;
6. Please identify when you first became aware of a certificate issue pertaining to the Superfish Software;
7. Please identify all agreements and/or contracts between Superfish and Komodia;
8. Please identify all communications between Superfish and Komodia pertaining to the Superfish Software;
9. Please state whether any other Superfish applications use the Komodia Redirector platform, and if so, identify such applications;
10. Please identify and describe all testing and investigation you performed or had performed regarding how the Superfish Software worked;
11. Please identify and describe all independent testing and investigation you performed or had performed regarding the Komodia Redirector platform; and
12. Please describe what remedial measures Superfish has taken subsequent to its discovery of a certificate issue pertaining to the Superfish Software.

Along with the responses, please provide us with copies of any documents, including email correspondence, identified in your responses and any other documents that support the responses. We ask that you provide the requested data within twenty (20) days of the date of this letter. Please forward this information via email to Assistant Attorney General Jonathan Blake at jonathan.blake@ct.gov, or to his attention at the following address: Office of the Attorney General, 110 Sherman St., Hartford, CT 06105-2294.

Should you have any questions, please contact AAG Blake at (860) 808-5400. We look forward to your response.

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