

# 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;

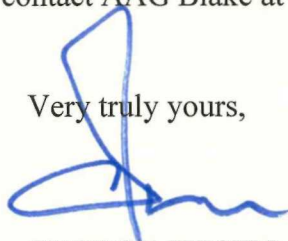
4. Please identify any other information about the number of computers with Superfish software sold or shipped to Connecticut residents;
5. Please identify all agreements and/or contracts between Lenovo and Superfish pertaining to the software;
6. Please identify all communications between Lenovo and 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](mailto: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