

December 22, 2023

VIA FIRST CLASS MAIL

Attorney General John Formella
Office of the Attorney General
Consumer Protection and Antitrust Bureau
33 Capitol Street
Concord, New Hampshire 03301

Re: Notice of Data Security Incident

Dear Attorney General Formella:

This notice is provided by Clay County, Minnesota ("Clay County") on behalf of Wilkin County Health & Human Services, following an incident that involved the of one (1) New Hampshire resident. Clay County will provide written notice to the impacted individual later today, via U.S. Mail. The notice letter includes general advice on how to protect one's identity and obtain free credit reports and security freezes, as well as instructions for enrolling in a , complimentary membership with Experian for credit monitoring and identity theft services. A copy of the notice letter is enclosed and additional details on the incident are below.

On October 27, 2023, Clay County's network was impacted by a ransomware attack that affected the electronic document management system ("CaseWorks"), which is hosted by Clay County and used by other Minnesota County social services entities. Clay County immediately began working with its local information technology partner to investigate, to securely restore operations, and determine the effects of the incident. Clay County also worked with a nationally recognized digital forensics firm to assist with the investigation and notified federal law enforcement and the Minnesota Department of Human Services. Through its investigation, Clay County determined that there was unauthorized access to its network between October 23, 2023 and October 26, 2023, and that the cyber criminals responsible for this attack took some data from Clay County's network, including data belonging to Wilkin County Health & Human Services. As soon as Clay County learned this, it started notifying the impacted counties and began an extensive review to determine what information may have been involved and who may have been affected, so that it could provide notice. Although that review is ongoing, beginning on December 8, 2023, Clay County determined that information related to a New Hampshire resident was included in the impacted data.

Because cyber threats are always evolving, Clay County is continuously working to identify and mitigate threats and evaluate its IT security protocols to protect sensitive data. To further enhance its security and to help prevent similar occurrences in the future, Clay County has taken or will be taking the following steps:

1. Implemented multi-factor authentication for any remote access to the CaseWorks application;
2. Updated procedures related to external access by any vendors;
3. Deployed security tools to enhance detection and accelerate response to cyber incidents; and
4. Enhancing technical security related to the CaseWorks application.



In addition, consistent with its compliance obligations and responsibilities, Clay County is providing notice of this incident to the United States Department of Health and Human Services and all appropriate state regulators.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

/s/ Matthew H. Meade, Esq.

MHM/
Enclosure



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

December 22, 2023

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ANYTOWN, FC 1A2 B3C

COUNTRY



NOTICE OF DATA SECURITY INCIDENT

Dear Sample A. Sample:

Clay County, Minnesota ("Clay County") is writing to tell you about a recent incident that involved personal information that we host on our computer network on behalf of [Extral]. We take this matter very seriously because we are committed to the privacy and security of all information in our possession. **At this time, we are not aware of any misuse of your information.** However, we are providing this notice to you to inform you of the incident, offer complimentary identity monitoring services, and suggest ways that you can protect your information.

What Happened

On October 27, 2023, Clay County's network was impacted by a ransomware attack that affected the electronic document management system ("CaseWorks"), which is hosted by Clay County and used by other Minnesota County social services entities. We immediately began working with our local information technology partner to investigate, to securely restore operations, and determine the effects of the incident. We also worked with a nationally recognized digital forensics firm to assist with the investigation and notified federal law enforcement and the Minnesota Department of Human Services. Through our investigation, we determined that there was unauthorized access to our network between October 23, 2023 and October 26, 2023, and that the cyber criminals responsible for this attack took some data belonging to [Extral] from Clay County's network. As soon as we learned this, we started notifying the impacted counties and began an extensive review to determine what information may have been involved and who may have been affected, so that we could provide notice. Although that review is ongoing, we are providing notice to the identified impacted individuals.

What Information Was Involved

The affected data contained your

What We Are Doing About It

Our investigators also searched Dark Web sources and found no indication that any personal information that Clay County maintains had been released or offered for sale as a result of this incident. To further enhance our security and to help prevent similar occurrences in the future, we have taken or will be taking the following steps:

1. Implemented multi-factor authentication for any remote access to the CaseWorks application;
2. Updated procedures related to external access by any vendors;
3. Deployed security tools to enhance detection and accelerate response to cyber incidents; and
4. Enhancing technical security related to the CaseWorks application.

In addition, consistent with our compliance obligations and responsibilities, we are providing notice of this incident to the United States Department of Health and Human Services and all appropriate state regulators.

What You Can Do

We recommend that you take the following preventative measures to help protect your information:

1. Enroll in a complimentary, 12-month membership with Experian. This membership will provide you with identity monitoring services, including a copy of your credit report at signup; credit monitoring; identity restoration; Experian IdentityWorks ExtendCARE; and up to \$1 million in identity theft insurance. Instructions on how to activate your membership are included at the end of this letter.
2. Remain alert for incidents of fraud and identity theft by regularly reviewing any account statements, free credit reports and health insurance Explanation of Benefits (EOB) forms for unauthorized or suspicious activity. Information on additional ways to protect your information, including how to obtain a free credit report and free security freeze, can be found at the end of this letter.
3. Report any incidents of suspected identity theft to your local law enforcement, state Attorney General and the major credit bureaus.

For More Information

Please accept our apologies that this incident occurred. We remain fully committed to maintaining the privacy of personal information in our possession and will continue to take many precautions to safeguard it. You have the right to receive a report on the facts and details of the investigation into this incident. If you would like a copy of the report, please contact us to request delivery of the report via mail or email. If you have any questions or concerns about this incident, you may contact our toll-free assistance line at 800-459-5922, Monday through Friday 8am to 8pm CST, closed Saturday and Sunday (excluding major U.S. holidays). Please be prepared to provide the following Engagement Number: B111997.

Sincerely,

Rhonda Porter, Director
Clay County Social Services

MORE INFORMATION ABOUT IDENTITY THEFT AND WAYS TO PROTECT YOURSELF

Visit <https://www.experian.com/blogs/ask-experian/category/fraud-and-identity-theft/> for general information regarding identity protection. You can obtain additional information about fraud alerts, security freezes, and preventing identity theft from the consumer reporting agencies listed below and the Federal Trade Commission (FTC) by calling its identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information online at <https://consumer.ftc.gov/features/identity-theft>. The FTC's address is: Federal Trade Commission, Division of Privacy and Identity Protection, 600 Pennsylvania Avenue, NW, Washington, DC 20580. You have the ability to place a security freeze on your credit reports by contacting the following agencies.

National Credit Reporting Agencies Contact Information

Equifax P.O. Box 105788 Atlanta, GA 30348 1-888-298-0045 www.equifax.com	Experian P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com	TransUnion P.O. Box 160 Woodlyn, PA 19094 1-800-916-8800 www.transunion.com
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Obtain Your Credit Report

You should also monitor your credit reports. You may periodically obtain your credit reports from each of the national consumer reporting agencies. In addition, under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three nationwide consumer reporting agencies listed above. You may obtain a free copy of your credit report by going to www.AnnualCreditReport.com or by calling (877) 322-8228. You also may complete the Annual Credit Report Request Form available from the FTC at <https://www.consumer.ftc.gov/sites/www.consumer.ftc.gov/files/articles/pdf/pdf-0093-annual-report-request-form.pdf> and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. You may also contact any of the three major consumer reporting agencies to request a copy of your credit report. You may be able to obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly.

If you discover inaccurate information or a fraudulent transaction on your credit report, you have the right to request that the consumer reporting agency delete that information from your credit report file.

Fraud Alerts

You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. As soon as one credit bureau confirms the fraud alert, they will notify the others. Additional information is available at www.annualcreditreport.com.

Security Freeze

You have the ability to place a security freeze on your credit report at no cost to you. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to all three of the credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; (5) a legible copy of a government-issued identification card, (6) proof of current address, such as a legible copy of a recent utility bill or bank or insurance

statement, (7) a legible copy of a recent W-2, pay stub, or Social Security card, and (8) if you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. **Under federal law, you cannot be charged to place, lift, or remove a security freeze.**

After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place, you will need it if you choose to lift the freeze. If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

Additional Helpful Information

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them at the information provided above. This notice was not delayed as a result of a law enforcement investigation.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name, or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

STATE SPECIFIC INFORMATION

MARYLAND residents: You may also obtain information about preventing and avoiding identity theft from the Maryland Attorney General's Office. This office can be reached at:

Office of the Attorney General of Maryland
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
<https://www.marylandattorneygeneral.gov/>
Toll-free: 1-888-743-0023

NEW MEXICO residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from a violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. You can review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfbp_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

NEW YORK residents: You may also obtain information on identity theft from the New York Department of State Division of Consumer Protection or the New York Attorney General. These agencies can be reached at:

New York Department of State
Division of Consumer Protection
1-800-697-1220
<http://www.dos.ny.gov/consumerprotection>

New York Attorney General
1-800-771-7755
<https://ag.ny.gov/>

NORTH CAROLINA residents: You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office. This office can be reached at:

North Carolina Department of Justice
Attorney General's Office
9001 Mail Service Center
Raleigh, NC 27699
www.ncdoj.gov
Toll-free: 1-877-566-7226

ADDITIONAL DETAILS REGARDING YOUR MEMBERSHIP

EXPERIAN IDENTITYWORKS

TO ACTIVATE YOUR MEMBERSHIP AND START MONITORING YOUR PERSONAL INFORMATION
PLEASE FOLLOW THE STEPS BELOW:

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 8 by Be prepared to provide engagement number as proof of eligibility for the identity restoration services by Experian. A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **800-459-5922**. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.