



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

SEP 24 2018

CONSUMER PROTECTION

Edward J. Finn
Office: 267-930-4776
Fax: 267-930-4771
Email: efinn@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

September 17, 2018

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

Our office continues to represent Dallas County Community College District, located at 1601 S. Lamar Street, Dallas, Texas 75215. We write to supplement our August 17, 2018 notice to your office a copy of which is attached as **Exhibit A**. By providing this supplemental notice, Dallas County Community College District does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

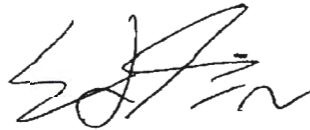
Since providing the initial notice, Dallas County Community College District identified one (1) additional affected resident of New Hampshire. Notice to that individual was mailed on September 17, 2018, after Dallas County Community College District confirmed the individual's mailing address, in substantially the same form as the letter attached hereto as **Exhibit B**.

Dallas County Community College District is offering those individuals with a Social Security number impacted by this event with access to one (1) year of complimentary credit monitoring and identity restoration services, and is offering all impacted individuals with helpful information on how to protect against identity theft and fraud. Dallas County Community College District is also taking steps to mitigate the risk that an event like this will happen again by reviewing its policies and procedures and implementing additional email security mechanisms. In addition to providing this notice to your office, Dallas County Community College District is providing notice to other state regulators and the consumer reporting agencies, as required.

Contact Information

Should you have any questions regarding this notification of other aspects of this event, please contact us at 267-930-4776.

Very truly yours,

A handwritten signature in black ink, appearing to read "EJ Finn", written in a cursive style.

Edward J. Finn of
MULLEN COUGHLIN LLC

EJF:ncl

Enclosure

EXHIBIT A
To Supplemental Notice



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Edward J. Finn
Office: 267-930-4776
Fax: 267-930-4771
Email: efinn@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

August 17, 2018

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

Our office represents Dallas County Community College District, located at 1601 S. Lamar Street, Dallas, Texas 75215. We write to notify you of an event that may affect the security of personal information relating to one (1) New Hampshire resident. The investigation into this situation is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Dallas County Community College District does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Background

On October 5, 2017, Dallas County Community College District identified unusual activity in an employee email account. Dallas County Community College District immediately changed the employee's credentials and launched an investigation, with the assistance of a third-party forensic investigation firm, to determine what happened. As part of the investigation, it was determined that certain employee email accounts were subject to unauthorized access and certain email messages and attachments stored therein may have been accessed or acquired by unauthorized individual(s). The unauthorized access to the impacted email accounts ranged in time from September 14, 2017 to December 18, 2017.

After an exhaustive search of the impacted email accounts, which included a manual review of documents to identify information contained therein, impacted individuals were identified as of May 29, 2018. Once impacted individuals were identified, Dallas County Community College

District worked to identify addresses for notification purposes. On May 29, 2018, it was determined the following information relating to one (1) New Hampshire resident was in an email potentially accessed or acquired by an unauthorized individual(s): name and Social Security number.

Notice to New Hampshire Residents

Dallas County Community College District mailed written notice of this incident to this one (1) New Hampshire resident on August 17, 2018, in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and To Be Taken

Dallas County Community College District's investigation into this event is ongoing. Dallas County Community College District is offering those individuals with a Social Security number impacted by this event with access to one (1) year of complimentary credit monitoring and identity restoration services, and is offering all impacted individuals with helpful information on how to protect against identity theft and fraud. Dallas County Community College District is also taking steps to mitigate the risk that an event like this will happen again by reviewing its policies and procedures and implementing additional email security mechanisms. In addition to providing this notice to your office, Dallas County Community College District is providing notice to other state regulators and the consumer reporting agencies, as required.

Contact Information

Should you have any questions regarding this notification of other aspects of this event, please contact us at 267-930-4776.

Very truly yours,

A handwritten signature in black ink, appearing to read 'EJ Finn', is positioned above the typed name.

Edward J. Finn of
MULLEN COUGHLIN LLC

EJF:ncl

Enclosure

EXHIBIT A



**Dallas County
Community College District**

Return Mail Processing Center
PO Box 6336
Portland, OR 97228-6336

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

Re: Notice of Data Breach

Dear <<Name 1>>:

Dallas County Community College District takes the security of your information very seriously. We are writing to you to inform you of an event that may impact the security of your personal information. While we do not have any indication that information relating to you has been used to engage in identity theft or fraud as a result of this event, we want to provide you with information about the event and what you can do to better protect against the possibility of identity theft and fraud if you feel it is appropriate to do so.

What Happened. On October 5, 2017, we identified unusual activity in an employee email account. We immediately changed the employee's credentials and launched an investigation, with the assistance of third-party forensic investigation firm, to determine what happened. As part of the investigation, we determined that certain employee email accounts were subject to unauthorized access and certain emails were potentially accessed or acquired by an unauthorized individual(s). The unauthorized access to these certain employee email accounts ranged in time from September 14, 2017 to December 18, 2017.

What Information Was Involved? On May 29, 2018, as part of the ongoing investigation, it was determined that the following information relating to you was in an email potentially accessed or acquired by the unauthorized individual(s): name, <<Data Exposed>>.

What We Are Doing. We take this event, and the security of your information, seriously. In addition to taking the steps detailed above, we are reviewing our policies and procedures to better protect against an event like this from happening again. While we are unaware of any actual or attempted misuse of your information, we are offering you complimentary access to 12 months of credit monitoring and identity restoration services with TransUnion. In addition to providing notice of this event to you, we are providing notice to certain state regulators and the consumer reporting agencies as required.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*, which contains instructions on how to enroll and receive the free credit monitoring and identity restoration services, as well as information on what you can do to better protect against the possibility of identity theft and fraud if you feel it is appropriate to do so.

For More Information. We understand you may have questions that are not answered in this letter. To ensure your questions are answered timely please contact our call center staffed with individuals familiar with this event and protecting against identity theft and fraud at 1-888-635-1247 (toll free number) Monday through Friday, 9:00 a.m. to 9:00 p.m. ET, except holidays.

We sincerely regret any inconvenience or concern this incident has caused you.

Sincerely,

A handwritten signature in black ink, appearing to read "David Williams". The signature is fluid and cursive, with the first name "David" and last name "Williams" clearly distinguishable.

David Williams
Chief Information Privacy & Security Officer
Dallas County Community College District

Steps You Can Take to Protect Against Identity Theft and Fraud

Enroll in Credit Monitoring.

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online three-bureau credit monitoring service (myTrueIdentity) for one year provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go to the myTrueIdentity website at www.mytrueidentity.com and in the space referenced as "Enter Activation Code", enter the following 12-letter Activation Code <<Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, three-bureau credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422. When prompted, enter the following 6-digit telephone pass code <<Pass Code>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Date>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion, or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score. The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion®, Experian® and Equifax®, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more.

The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

Monitor Your Accounts.

Credit Reports. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports and explanation of benefits forms for suspicious activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

Fraud Alerts. At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below:

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com

Security Freeze. You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. Fees vary based on where you live, but commonly range from \$3 to \$15. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will

need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver's license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
www.freeze.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze/place-credit-freeze

Additional Information. You can further educate yourself regarding identity theft, security freezes, fraud alerts, and the steps you can take to protect yourself against identity theft and fraud by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should be reported to law enforcement, the Federal Trade Commission, and your state Attorney General. This notice has not been delayed as the result of a law enforcement investigation. **For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. The above referenced entity, Dallas County Community College District, is located at 1601 S. Lamar St., Dallas, TX, 75215. **For 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 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_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. **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov. **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of 1 Rhode Island resident may be impacted by this incident.

EXHIBIT B
To Supplemental Notice



**Dallas County
Community College District**

Return Mail Processing Center
PO Box 6336
Portland, OR 97228-6336

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

Re: Notice of Data Breach

Dear <<Name 1>>:

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Dallas County Community College District

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You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Date>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion, or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score. The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion®, Experian® and Equifax®, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more.

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Fraud Alerts. At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below:

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com

Security Freeze. You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. Fees vary based on where you live, but commonly range from \$3 to \$15. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will

need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver's license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
www.freeze.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze/place-credit-freeze

Additional Information. You can further educate yourself regarding identity theft, security freezes, fraud alerts, and the steps you can take to protect yourself against identity theft and fraud by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should be reported to law enforcement, the Federal Trade Commission, and your state Attorney General. This notice has not been delayed as the result of a law enforcement investigation. **For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. The above referenced entity, Dallas County Community College District, is located at 1601 S. Lamar St., Dallas, TX, 75215. **For 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 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_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. **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov. **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of 1 Rhode Island resident may be impacted by this incident.