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February 26, 2016

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Attorney General Joseph Foster
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Re: Data Security Incident

Dear Attorney General Foster:

We represent Dr. Ravi Krishnan who owns and operates the Eye Institute of Corpus Christi (the "Eye Institute"), a medical clinic in Corpus Christi, Texas that provides full service eye care, diagnosis, and treatment, with respect to a potential data security incident described in more detail below. Notification is being provided to impacted individuals.

1. Nature of security incident.

On January 6, 2016, the Eye Institute learned that individuals acting on behalf of two doctors who were recently but no longer associated with the Eye Institute, accessed its data base of electronic patient records, downloaded a copy of all of the Eye Institute's patient records, and provided that copy to the doctors. The doctors who were provided with the copy of the records had recently disassociated with the practice and were no longer employed by or affiliated with the Eye Institute. As soon as the incident was discovered, an investigation was started and based on that investigation, it appears that the copy of the records was made without obtaining consent from each of these patients. In response to this event, the Eye Institute has changed the system passwords and credentials and has requested that these doctors return the copy of the records. In addition, a report regarding this incident has been made to law enforcement. The involved records appear to contain patient names, addresses, dates of birth, Social Security numbers, health insurance and payment information, and records of patient treatment and diagnosis.

Although it appears these doctors have used information in the medical records to contact and solicit patients, there is no indication of any other unauthorized use or disclosure of the information in the records.

2. Number of New Hampshire residents affected.

Two (2) New Hampshire residents were affected by the data security incident. Notification letters to those individuals were mailed on February 26, 2016, via regular mail. A copy of the notification letter is

Bank of America Plaza, 901 Main Street, Suite 4800 • Dallas, TX 75202 • p 214.698.8000 • f 214.698.1101

Albany • Baltimore • Boston • Chicago • Connecticut • Dallas • Denver • Garden City • Houston • Las Vegas • London • Los Angeles • Louisville • McLean
Miami • New Jersey • New York • Orlando • Philadelphia • San Diego • San Francisco • Washington, DC • West Palm Beach • White Plains
Affiliates: Berlin • Cologne • Frankfurt • Munich • Paris

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included with this letter.

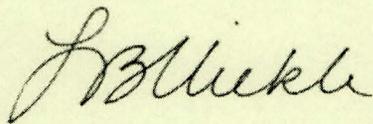
3. Steps you have taken or plan to take relating to the incident.

The Eye Institute has taken steps to change the access credentials for its patient records. In addition, a report has been made to the local authorities as well as the state medical board. Notification is also being provided to the credit reporting agencies.

4. Contact information.

The Eye Institute is committed to the protection and security of its patient records. If you have any questions or need additional information, please do not hesitate to contact me at Lindsay.Nickle@wilsonelser.com or (214) 698-8093.

Very truly yours,



Lindsay B. Nickle

Enclosure



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

<<mail id>>
<<Name1>>
<<Address1>>
<<Address2>>
<<City>><<State>><<Zip>>

<<Date>>

Dear <<Name>>:

I am writing to inform you of a data security incident that may have resulted in the disclosure of your personal information without your consent. The information involved may include your medical records, a copy of which may now be in possession of doctors who are no longer affiliated with my practice, the Eye Institute of Corpus Christi. I, and my staff, take the privacy and security of your information very seriously and sincerely apologize for any concern or inconvenience this may cause you. This letter contains information about steps you can take to protect your information and resources we are making available to help you.

On January 6, 2016, the Eye Institute of Corpus Christi learned of a data security incident involving our electronic patient records. An internal investigation was started immediately, and while that investigation is ongoing, it appears that individuals acting on behalf of two doctors recently associated with the Eye Institute of Corpus Christi were able to access patient records, download a copy of your patient file, and provide that copy to the doctors. Upon review, it appears that your file contained information such as your name, address, date of birth, phone number, Social Security number, and protected health information, such as information about your diagnosis and treatment.

As soon as the unauthorized access was discovered, additional safeguards were implemented to help prevent this type of event from happening again, including changing the passwords to our systems. A report has also been made to the appropriate authorities.

Although I have become aware that these doctors have used information in the medical records to contact and solicit some of my patients, I am not aware of any other unauthorized use or disclosure of your information resulting from this event, and the Eye Institute of Corpus Christi remains committed to the appropriate maintenance and protection of the records for all of its current and former patients and will continue to comply with the instructions you have previously provided regarding the disclosure of your patient records. However, should you wish to update the consent and authorization forms in your record to give permission to disclose your records to a different medical practice, you are welcome to come by the Eye Institute of Corpus Christi at 5729 Esplanade Drive at any time and execute a new authorization form. In addition, you may wish to consider taking the following steps to protect yourself.

First, you may want to place a fraud alert on your credit file to let creditors know to contact you before opening a new account in your name. Call any one of the three credit reporting agencies at the phone numbers listed below. You should (1) request that a fraud alert be placed on your account and (2) order a free credit report from the agency.

Equifax 1-888-766-0008

Experian 1-888-397-3742

TransUnion 1-800-680-7289

Secondly, when you receive your credit reports, look them over carefully for accounts you did not open or for inquiries from creditors that you did not initiate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report. Third, if you find any suspicious activity on your credit reports, call your local police or sheriff's office. If you have any concerns or complaints regarding your medical records, you may contact the Texas Medical Board at 1-800-201-9353.

Your trust is a top priority for the Eye Institute of Corpus Christi, and I deeply regret any concern this may cause. If you have any questions, please call 1-877-866-6850, 8 a.m. to 8 p.m. Central Time, Monday–Friday. I remain dedicated to providing you with the best medical care and look forward to serving you.

Sincerely,

Ravi Krishnan, M.D
The Eye Institute of Corpus Christi

U.S. State Notification Requirements

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies:

Equifax

P.O. Box 105139
Atlanta, GA 30374
1-800-685-1111
www.equifax.com

Experian

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

TransUnion

P.O. Box 6790
Fullerton, CA 92834
1-800-916-8800
www.transunion.com

You may also obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State law advises you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

For residents of Maryland, Illinois, and North Carolina:

You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

**Maryland Office of the
Attorney General**

Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

**North Carolina Office of the
Attorney General**

Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Federal Trade Commission

Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, D.C. 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/bcp/edu/microsites/idtheft

For residents of Massachusetts:

It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you but also may delay you when you seek to obtain credit. The contact information for all three credit bureaus is below.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. 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 need to send a request to each consumer reporting agency by certified, overnight, or regular stamped mail. 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; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. The consumer reporting agency may charge a fee of up to \$5.00 to place, lift, or remove a freeze but is free if you are a victim of identity theft or the spouse of a victim of identity theft, and you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency. You may obtain a security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
www.equifax.com

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
www.experian.com/freeze

TransUnion (FVAD)

P.O. Box 2000
Chester, PA 19022
www.transunion.com

More information can also be obtained by contacting the Federal Trade Commission listed above.