



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 6, 2023

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Great Lakes Wealth, LLC (“Great Lakes”) located at 22260 Haggerty Road, Suite 160, Northville, MI 48167, and are writing to notify your office of an incident that may affect the security of certain personal information relating to four (4) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Great Lakes 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.

Nature of the Data Event

On or around February 10, 2023, Great Lakes Wealth became aware of suspicious activity related to a Great Lakes Wealth employee’s email account. Great Lakes immediately launched an investigation which determined that an unauthorized individual logged into the email account between December 6, 2022, and February 10, 2023. At this time, there has been no indication of any misuse of personal information in relation to this incident. However, in an abundance of caution, a thorough and time-intensive review was undertaken on the contents of the impacted email account to identify the presence of sensitive information. The information contained within the subject account that may have been impacted may vary by individual and includes

Notice to New Hampshire Residents

On October 6, 2023, Great Lakes began providing written notice of this incident to potentially impacted individuals, including four (4) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached hereto as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon becoming aware of the event, Great Lakes moved quickly to investigate and respond to the incident, assess the security of its email environment, and identify potentially affected individuals. Great Lakes is also working to implement additional safeguards and training to its employees. Great Lakes is providing access to credit monitoring services for _____, through Equifax to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Great Lakes is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Great Lakes is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at _____.

Very truly yours,

Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW/aml
Enclosure

EXHIBIT A



22260 Haggerty Road, Suite 160
Northville, MI 48167
T 248.378.1200
F 248.378.1201

<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

<<b2b_text_1(Notice of Security Incident / Data Breach - CA residents)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

On behalf of Great Lakes Wealth LLC (“Great Lakes Wealth”), we write to notify you of a recent event that may affect the security of your personal information. Although there is no indication that any personal information has been misused in relation to this event, we are providing you with information about the event, our response, and additional measures you can take to help protect your information, should you feel it appropriate to do so.

What Happened? On or around February 10, 2023, Great Lakes Wealth became aware of suspicious activity related to a Great Lakes Wealth employee’s email account. We immediately launched an investigation into the nature and scope of the incident with the assistance of industry-leading cybersecurity specialists. The investigation determined that an unauthorized individual logged into an employee Microsoft Outlook account and may have accessed files containing your information between December 6, 2022 - February 10, 2023. Out of an abundance of caution, we are notifying you because some of your information was stored in the impacted account.

What Information Was Involved? The following types of your information may have been impacted: <<b2b_text_2(data elements)>>. At this time, there has been no indication of any misuse of personal information in relation to this incident.

What We Are Doing. We take this event and the security of information in our care seriously. Upon becoming aware of this event, we promptly took steps to investigate and respond, assess the security of our systems, and notify potentially affected individuals. Additionally, we are reviewing and enhancing our information security policies and procedures.

Although we are unaware of any fraudulent misuse of your information as a result of this event, as an additional precaution, Great Lakes Wealth is offering you access to of complimentary identity monitoring services through Kroll. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until *<<b2b_text_6(activation deadline)>>* to activate your identity monitoring services.

Membership Number: *<<Membership Number s_n>>*

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

What You Can Do. We encourage you to remain vigilant against suspicious activity, including incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports (to the extent available in your jurisdiction) for suspicious activity and to detect errors. Please also review the enclosed *Steps You Can Take to Help Protect Your Personal Information*, which contains information on what you can do to safeguard against possible misuse of your information. You can also activate the identity monitoring services that are being offered, to the extent available in your country.

For More Information. The confidentiality, privacy and security of your personal data is a priority at Great Lakes Wealth, and we thank you for your understanding. We can assure you that we have been doing, and will continue to do, everything we can to prevent this type of incident from occurring again.

If you have additional questions, please call our toll free hotline at [TFN](tel:18003687766) Monday through Friday from 8:00 am to 5:30 pm Central Time (excluding U.S. holidays).

Sincerely,

Dewey D. Steffen
CEO and Chief Investment Officer
Great Lakes Wealth LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Activate Identity Monitoring Services



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll¹:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a credit freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may 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 also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 410-528-8662 or 888-743-0023; and www.oag.state.md.us. Great Lakes Wealth is located at 22260 Haggerty Road, Suite 160 Northville, MI 48167.

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 bureaus 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. NW, Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are <<#>> Rhode Island residents impacted by this incident.