



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

MAR 06 2023

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

CONSUMER PROTECTION

February 28, 2023

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

To Whom It May Concern:

We represent Jackson O'Keefe, LLP ("Jackson O'Keefe") located at 433 Silas Deane Highway, Wethersfield, CT 06109, and are writing to notify your Office of an incident that may affect the security of certain information relating to two (2) New Hampshire residents. By providing this notice, Jackson O'Keefe 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 about September 2, 2022, Jackson O'Keefe discovered suspicious activity related to an employee email account. Upon discovery, Jackson O'Keefe immediately took steps to secure the account and launched an investigation with the assistance of third-party forensic investigators to determine the nature and scope of the activity. The forensic investigators determined that an employee email account was subject to unauthorized access on separate occasions between August 9, 2022 and September 2, 2022. As a result, the unauthorized actor may have had access to certain emails and attachments within this account. The investigation was unable to identify all emails or attachments in the account that the unauthorized individual may have accessed or acquired. Therefore, out of an abundance of caution, Jackson O'Keefe conducted a review of the entire contents of the email account for emails or attachments that may contain personal information. This review completed on or about November 28, 2022 and Jackson O'Keefe then began reviewing internal records to identify address information for the potentially impacted individuals in order to provide them with notice of the incident. While the information was not the same for each

individual, the information that could have been subject to unauthorized access includes name and Social Security number.

Notice to New Hampshire Residents

On or about February 28, 2023, Jackson O'Keefe provided written notice of this incident to two (2) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Jackson O'Keefe, moved quickly to investigate and respond to the incident, change the impacted email account password and took steps to secure all employee email accounts, and identify potentially affected individuals. Jackson O'Keefe is also working to implement additional safeguards and training to its employees and is providing complimentary access to credit monitoring services for twenty-four (24) months, through Experian, to individuals whose information was potentially affected by this incident.

Additionally, Jackson O'Keefe is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, 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,

Gregory Lederman of
MULLEN COUGHLIN LLC

GCL/kzf
Enclosure

EXHIBIT A

Return Mail Processing
PO Box 999
Suwanee, GA 30024

SAMPLE A. SAMPLE - L01
APT ABC
 123 ANY ST
ANYTOWN, US 12345-6789

February 28, 2023

NOTICE OF [Extra1]

Dear Sample A. Sample:

Jackson O'Keefe, LLP ("Jackson O'Keefe") is writing to inform you of a recent incident that may impact the security of some of your information. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the incident, our response, and steps you may take to better protect against the possibility of identity theft or fraud, should you feel it necessary to do so.

What Happened? Jackson O'Keefe recently discovered suspicious activity related to an employee email account. Upon discovery, we immediately took steps to secure the account and launched an investigation with the assistance of third-party investigators to determine the nature and scope of the activity. The investigation determined that one employee email account was subject to unauthorized access on separate occasions between August 9, 2022 and September 2, 2022. As a result, the unauthorized actor may have had access to certain emails and attachments within this account.

What Information Was Involved? The investigation was unable to identify all emails or attachments in the account that the unauthorized individual may have accessed or acquired. Therefore, out of an abundance of caution, we conducted a comprehensive review of the entire contents of the impacted email account in order to identify emails or attachments that may contain sensitive information. This review was recently completed and we are notifying you of this incident because the investigation confirmed that your information was present at the time of the incident. The information related to you that may be impacted includes your [Extra2] and name. To date, Jackson O'Keefe is not aware of any actual or attempted misuse of your information.

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities and we take this incident very seriously. When we discovered this incident, we immediately reset the impacted email account password and took steps to determine what information was in the impacted account and to which Jackson O'Keefe clients the information belonged. We further confirmed the security of our employee email accounts and related systems and are reviewing and strengthening our existing policies, procedures, and safeguards related to cyber security. We have also notified regulatory authorities, as required by law.

As an added precaution, we are also offering you complimentary access to two years of credit and identity monitoring, fraud consultation, and identity theft restoration services through Experian at no cost to you. We encourage you to enroll in these services, as we are not able to enroll you on your behalf. More information and instructions on how to enroll in these services may be found in the attached *Steps You Can Take to Help Protect Your Information*.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Your Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (833) 704-9391, Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays).

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

Sincerely,
Jackson O'Keefe, LLP

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for twenty-four months.

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. 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 Identity Restoration is available to you for twenty-four 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary twenty-four month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by May 31, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 704-9391 by May 31, 2023. Be prepared to provide engagement number _____ as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR TWENTY-FOUR-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* 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.

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 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. Jackson O'Keefe is located at 433 Silas Deane Highway, Wethersfield, CT 06109.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. Jackson O'Keefe is located at 433 Silas Deane Highway, Wethersfield, CT 06109.

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. N.W., 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; 1-800-771-7755; 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; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.