



MULLEN  
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November 11, 2022

**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**

Dear Sir or Madam:

We represent Neurology Center of Nevada ("NCNV") located at 2430 W. Horizon Ridge Parkway Henderson, NV 39052, and are writing to notify your office of an event that may affect the security of certain personal information relating to approximately one (1) New Hampshire resident. This notice may be supplemented if significant new facts are learned subsequent to its submission. By providing this notice, NCNV 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 July 17, 2022, NCNV identified certain computer systems were inaccessible. NCNV promptly undertook an extensive investigation, with the assistance of third-party digital forensic and cybersecurity specialists, to determine the nature and scope of the event. NCNV also promptly reported the event to federal law enforcement. Because the impacted systems contained patient information, NCNV worked quickly to restore access to the systems to continue patient care without disruption and investigate to determine if the event resulted in any unauthorized access to patient information.

The investigation subsequently determined that between June 12, 2022 and July 17, 2022, certain files were accessed by an unknown actor. In an abundance of caution, NCNV conducted a comprehensive review of the information on the impacted systems to determine what information was contained therein and to whom the information related. NCNV then worked to confirm the

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identities and contact information for potentially affected individuals to provide notifications. This review was recently completed.

The information that could have been subject to unauthorized access varies by individual and could include full name, address, date of birth, gender, health insurance information, and medical information, including diagnosis/treatment information, lab results, and medications. For a limited number of individuals, Social Security number may have been included as well.

#### **Notice to the New Hampshire Resident**

On September 15, 2022, NCNV began providing notice of this event to affected individuals by posting notice on its website and issuing notice to prominent media outlets in Nevada while its data review was ongoing. NCNV did not have any reason to believe that affected individuals currently resided in New Hampshire until November 8, 2022. On November 11, 2022, NCNV continued providing notice of this event via written letter to potentially affected individuals including approximately one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached hereto as *Exhibit A*. Website notice was issued in substantially the same form as the notice attached hereto as *Exhibit B*.

#### **Other Steps Taken and To Be Taken**

Upon becoming aware of the event, NCNV moved quickly to investigate and respond, assess the security of its systems, and identify the potentially affected individual. NCNV is also working to implement additional safeguards and training to its employees. NCNV is providing access to complimentary credit monitoring and identity restoration services for twelve (12) months, through Experian, to the individual whose personal information was potentially affected by this event, at no cost to this individual. NCNV is also establishing a dedicated, toll-free assistance line for notified individuals to call with any questions or concerns.

Additionally, NCNV is providing the impacted individual with guidance on how to better protect against identity theft and fraud. NCNV is providing the individual with 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.

NCNV is also providing written notice of this event to other appropriate state and federal regulators, as well as the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Office of the New Hampshire Attorney General  
November 11, 2022  
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**Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4802.

Very truly yours,

Samuel Sica, III of  
MULLEN COUGHLIN LLC

SZS/aml  
Enclosure

# **EXHIBIT A**



Return Mail Processing Center  
P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<Date>>

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

<<Country>>

Dear <<Name 1>>:

Neurology Center of Nevada ("NCNV") is writing to notify you of a recent event that may affect the security of some of your information. This notice provides information about the event, our response, and resources available to you to help protect your information from possible misuse, should you feel it appropriate to do so.

**What Happened?** On July 17, 2022, we identified that certain computer systems were inaccessible. We promptly undertook an extensive investigation to determine the nature and scope of the event. We also reported the event to federal law enforcement. Because the impacted systems contained patient information, we worked quickly to restore access to the systems to continue patient care without disruption and investigate to determine if the event resulted in any unauthorized access to patient information. The investigation subsequently determined that between June 12, 2022 and July 17, 2022, certain files were accessed by an unknown actor.

In an abundance of caution, we conducted a comprehensive review of the information on the impacted systems to determine what information was contained therein and to whom the information related. We then worked to confirm the identities and contact information for potentially affected individuals to provide notifications. This review was recently completed.

**What Information Was Involved?** The type of impacted information varies by individual and could have included: full name, address, date of birth, gender, health insurance information, and medical information, including diagnosis/treatment information, lab results, and medications. For a limited number of patients, Social Security number may have been included as well.

**What We Are Doing.** We take this event and information security very seriously. Upon learning of this event, we immediately took steps further secure our systems and restore our operations. As part of our ongoing commitment to information security, we are reviewing our existing policies and procedures and implementing additional administrative and technical safeguards to further secure information in our care. We also reported the event to the U.S. Department of Health and Human Services and federal law enforcement. As an additional precaution, we are offering you access to <<CM Length>> months of complimentary credit monitoring and identity restoration services through Experian.

**What You Can Do.** As a precautionary measure, individuals are encouraged to remain vigilant against incidents of identity theft by reviewing account statements, credit reports, and explanations of benefits for unusual activity and to detect errors. We also encourage individuals to report any suspicious activity promptly to their insurance company, health care provider, or financial institution. Additional detail can be found below in the *Steps You Can Take to Help Protect Your Information*. You may also enroll in the complimentary credit monitoring services described above. Enrollment instructions are enclosed with this letter.

**For More Information.** If you have additional questions, please call our toll-free assistance line at 844-326-7297, Monday through Friday, during the hours of 6:00 a.m. to 6:00 p.m., Pacific time (excluding U.S. holidays). You may also write to NCNV at 2430 W. Horizon Ridge Parkway, Henderson, NV 89052.

Sincerely,

Neurology Center of Nevada

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

### **Enroll in Credit Monitoring**

To help protect your identity, we are offering a complimentary <<CM Length>> -month membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

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

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 1-877-288-8057 by <<Enrollment Deadline>>. Be prepared to provide engagement number <<Engagement Number>> as proof of eligibility for the identity restoration services by Experian.

### **Additional details regarding your <<CM Length>> 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.<sup>1</sup>
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** 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<sup>2</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 1-877-288-8057. 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 (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 <<CM Length>> 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](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

### **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](http://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 one-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.

<sup>1</sup> Off line members will be eligible to call for additional reports quarterly after enrolling.

<sup>2</sup> 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.



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
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
888-298-0045	1-888-397-3742	833-395-6938
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](http://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. 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](http://oag.dc.gov).

*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](http://www.oag.state.md.us).

*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 violators. 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-fcrapdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcrapdf), 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](http://www.ncdoj.gov).

# **EXHIBIT B**



## Notice of Data Security Event

— Neurology Center of Nevada (NCCNV) is issuing updated notice of a recent data security event that may impact the confidentiality of information related to certain individuals. We are providing updated information about the event, our response, and steps potentially affected individuals may take to better protect against the possibility of identity theft and fraud, should they feel it is appropriate to do so.

**What Happened?** On July 17, 2022, we identified certain computer systems were inaccessible. We promptly undertook an extensive investigation to determine the nature and scope of the event. We also reported the event to federal law enforcement. Because the impacted systems contained patient information, we worked quickly to restore access to the systems to continue patient care without disruption, and investigate to determine if the event resulted in any unauthorized access to patient information.

The investigation subsequently determined that between June 12, 2022 and July 17, 2022, certain files were accessed by an unknown actor. In an abundance of caution, we conducted a comprehensive review of the information on the impacted systems to determine what information was contained therein and to whom the information related. We recently completed this review and are providing potentially affected individuals with notice of this event via written letter, by issuing updated notice to the media, and by posting this updated notice on our website.

**What Information Was Affected.** The types of impacted information varies by individual and could have included full name, address, date of birth, gender, health insurance information, and medical information, including diagnosis/treatment information, lab results, and medications – for a limited number of individuals. Social Security number may have been included as well.

**What We Are Doing.** We take this event and information security very seriously. Upon learning of this event, we immediately took steps further secure our systems and restore our operations. As part of our ongoing commitment to information security, we are reviewing our existing policies and procedures and implementing additional administrative and technical safeguards to further secure information in our care. We also reported the event to the U.S. Department of Health and Human Services, Federal law enforcement, and appropriate state regulators.

**What Affected Individuals Can Do.** As a precautionary measure, individuals are encouraged to remain vigilant against incidents of identity theft by reviewing account statements, credit reports, and explanations of benefits for unusual activity and to detect errors. Any suspicious activity should be reported promptly to your insurance company, health care provider, or financial institution. Additional information can be found below in the *Steps you Can Take to Help Protect your Information*.

**For More Information.** If you have additional questions, please call our toll-free assistance line at (800) 754-5085, Monday through Friday during the hours of 9:00 a.m. to 5:00 p.m. Pacific time (excluding U.S. holidays). You may also write to NCCNV at 2430 W. Horizon Ridge Parkway, Henderson, NV 89052.

### Steps You Can Take To Help Protect Your Information

#### 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](http://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 one-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 photo copy of a government-issued identification card (state driver's license or ID card, military identification, 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
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/fcinfo/">https://www.experian.com/fcinfo/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
1-888-298-0045	1-888-297-3742	1-833-395-6936
Equifax Fraud Alert, P.O. Box 10506, Atlanta, GA 30348-5066	Experian Fraud Alert, P.O. Box 9604, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19015
Equifax Credit Freeze, P.O. Box 105/88 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9604, 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 20500; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4350); and TV: 1-866-658-4261. 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. 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: 441 4th St. NW #1100 Washington, D.C. 20001; 202-727-3400 and [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-866-743-0322; and [www.oag.state.md.us](http://www.oag.state.md.us).

*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.consumercfinance.gov/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumercfinance.gov/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 [nys.oag.ny.gov](http://nys.oag.ny.gov).

*For North Carolina residents*, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-565-7726 or 1-919-716-6000 and [www.ncdoj.gov](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.nag.ri.gov](http://www.nag.ri.gov) and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this event.