# CLARK HILL

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November 5, 2018

Attorney General Gordon MacDonald Office of the Attorney General New Hampshire Department of Justice 33 Capitol Street Concord, NH 03302

Dear Attorney General MacDonald:

We represent Peter Freuler & Associates CPA ("PFA") with respect to a data security incident involving the potential exposure of certain personally identifiable information described in more detail below. PFA provides accounting services in Orlando, Florida.

## 1. Nature of security incident.

On September 3, 2018, PFA was notified that some of its clients had experienced fraudulent tax filings. PFA immediately began an investigation to determine whether its systems were secure, and hired an independent computer forensics firm to assist. Initially, PFA believed that any potential compromise had not occurred on its systems as it used an online portal to access its tax filing system and initial review did not identify any suspicious activity associated with access to the portal. On September 21, 2018, the forensic investigation determined that an unauthorized individual remotely accessed files on PFA's computer network on May 26, 2018. The files at risk may have contained clients' names, addresses, Social Security numbers, bank account information, and other tax related information.

## 2. Number of residents affected.

Two (2) New Hampshire residents were notified of the incident. A notification letter was sent to the affected individuals on November 5, 2018 via regular mail (a copy of the form notification letter is enclosed).

## 3. Steps taken or plan to take relating to the incident.

PFA took immediate action to address this incident and prevent a similar incident in the future. Steps taken include changing passwords to all employee e-mail accounts, implementing additional e-mail security enhancements, adding additional layers of security to PFA's remote access process, reviewing and enhancing security permission responsibilities and rights, implementing two-factor authentication on various programs, and providing additional training

to employees on recognizing and appropriately responding to suspicious emails and other security threats. Additionally, affected individuals were offered credit monitoring and identity restoration services free of charge for one year.

## 4. Contact information.

PFA remains dedicated to protecting the confidential information in its possession. If you have any questions or need additional information, please do not hesitate to contact me at MVentrone@ClarkHill.com or (312) 260-2506.

Very truly yours,

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Clark Hill PLC

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Melissa K. Ventrone

Enclosure



To Enroll, Please Call: 877-899-5510 Or Visit: https://ide.myidcare.com/*customending* Enrollment Code: <<XXXXXXX>>

C/O ID Experts 10300 SW Greenburg Rd. Suite 570 Portland, OR 97223

<<First Name>> <<Last Name>> <<Address1>> <<Address2>> <<City>>, <<State>> <<Zip>>

November 5, 2018

#### Notice of Data Security Incident

#### Dear <</First Name>> <<Last Name>>:

We are writing to notify you of a data security incident experienced by Peter Freuler & Associates CPA ("PFA") that may have impacted your personal information, including your name, Social Security number, and tax information. We value and respect the privacy of your information, 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.

#### What happened:

On September 3, 2018 we discovered that some of PFA's clients had experienced fraudulent tax filings. We immediately began an investigation to determine whether our systems were secure, and hired an independent computer forensics firm to assist. On September 21, 2018, the forensic investigator informed us that an unauthorized individual accessed files on PFA's computer network, and that these files may have contained your information. From our review, it appears the files at risk may have contained your name, address, and Social Security number, bank account information if you provided this to us, and other tax related information.

#### What we are doing and what you can do:

We are offering identity theft protection services through ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare<sup>™</sup>. MyIDCare services include: 12 months of credit monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

We encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling 877-899-5510 or going to <u>https://ide.myidcare.com/*customending*</u> and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 7 am - 7 pm Central Time. Please note the deadline to enroll is February 7, 2019.

If you received a fraudulent deposit from the IRS into your bank account as a result of this incident, the IRS has recommended the following:

- 1. Do not spend this money, as it must be returned to the IRS.
- 2. Contact your bank's fraud department and let them know that the money was deposited as a result of a fraudulent tax filing, and that the deposit should be reversed as soon as possible.
- 3. Do not return the money by check. The most reliable way for the money to be returned and credited to you is to instruct your bank to reverse the deposit.
- 4. If you have any issues with your bank and the return of the money, please contact your tax preparer at PFA.

Additionally, if you know or suspect you are a victim of tax-related identity theft, the IRS recommends the following steps:

- Respond immediately to any IRS written notice; call the number provided or, if instructed, go to IDVerify.irs.gov.
- Complete IRS Form 14039, Identity Theft Affidavit. Use a fillable form at IRS.gov, print, then attach the form to your return and mail according to instructions. This form will be completed by PFA on your behalf and filed with your 2017 tax filings. If you plan on filing on extension, please contact your PFA Tax professional for more information.
- Continue to pay your taxes and file your tax return, even if you must do so by paper.

If you previously contacted the IRS and did not have a resolution, contact the IRS for specialized assistance at 1-800-908-4490. The IRS has teams available to assist. You may also visit https://www.irs.gov/Individuals/Identity-Protection for more information.

We also want you to know that we took immediate action to address this incident to prevent a similar incident in the future. We changed passwords to all employee e-mail accounts, implemented additional e-mail security enhancements, added additional layers of security to our remote access process, reviewed and enhanced security permission responsibilities and rights, implemented two-factor authentication on various programs, and provided additional training to our employees on recognizing and appropriately responding to suspicious emails and other security threats.

#### For more information:

If you have any questions or concerns, please call at 877-899-5510, Monday through Friday, 7:00 a.m. - 7:00 p.m. Central Time. Your trust is a top priority for PFA, and we deeply regret any inconvenience or concern that this matter may cause you.

Sincerely,

UNTRUCPA

Peter J. Freuler, Jr., P.A., CPA

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	Experian
P.O. Box 105139	P.O. Box 2002
Atlanta, GA 30374	Allen, TX 75013
1-800-685-1111	1-888-397-3742
www.equifax.com	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 <u>www.annualcreditreport.com</u>, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at <u>www.annualcreditreport.com</u>) 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 laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

#### For residents of Maryland, Illinois, North Carolina, and Rhode Island:

You can obtain information from the Maryland, North Carolina, and Rhode Island 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 Attorney	North Carolina Attorney	Rhode Island Attorney	Federal Trade Commission
General	General	General	Consumer Response
Consumer Protection Div. 200 St. Paul Place Baltimore, MD 21202 1-888-743-0023 www.oag.state.md.us	Consumer Protection Div. 9001 Mail Service Center Raleigh, NC 27699-9001 1-877-566-7226 www.ncdoj.com	Consumer Protection Div. 150 South Main Street Providence, RI 02903 (401) 274-4400 www.riag.ri.gov	Center 600 Pennsylvania Avenue, NW Washington, DC 20580 1-877-IDTHEFT (438- 4338) www.identityTheft.gov

#### 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 also via each credit bureau'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. As of September 21, 2018, fraud alerts will now last one year, instead of 90 days. Fraud alerts will continue to be free and identity theft victims can still get extended fraud alerts for seven years.

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

**Security Freeze:** 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, each credit reporting agency has a dedicated web page for security freezes and fraud alerts or you can request a freeze by phone or by 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 may also require 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. Effective September 21, 2018, placing a freeze on your credit report is now free for all United States citizens.

#### Equifax Security Freeze

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

#### Experian Security Freeze P.O. Box 9554 Allen, TX 75013 http://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.