

# CIPRIANI & WERNER

A PROFESSIONAL CORPORATION

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RECEIVED

AUG 01 2022

CONSUMER PROTECTION

July 25, 2022

**Via First Class Mail**

Office of the Attorney General  
33 Capitol Street  
Concord, New Hampshire 03302

**RE: Data Incident Notification**

To Whom It May Concern:

We serve as counsel for Raw Sugar, LLC ("Raw Sugar") located at 1640 S. Sepulveda Boulevard, Los Angeles, California 90025 and write to inform you of a data security incident. By providing this notice, Raw Sugar does not waive any rights or defenses under New Hampshire law, including the data breach notification statute.

On March 23, 2022, Raw Sugar discovered suspicious activity related to one employee email account. Upon discovery, Raw Sugar took swift action to secure the email system and network. Raw Sugar also launched an internal investigation and engaged leading, independent cybersecurity specialists. Based on this investigation, Raw Sugar confirmed that one employee email account was subject to unauthorized access between January 24, 2022 and January 26, 2022. Upon discovery, Raw Sugar immediately began a thorough review of the contents of the email account to determine the type of information contained within the account and to whom that information related. On May 31, 2022, the review was completed, and it was determined that information related to one (1) New Hampshire resident was present in the account at the time of the unauthorized access. The information included first name and last name, in combination with a Social Security number, financial account number, and routing number.

On July 22, 2022, Raw Sugar sent written notice of this incident to the potentially impacted New Hampshire resident pursuant to New Hampshire law. The notice letter included an offer of complimentary credit monitoring and identity protection services for twelve (12) months. The notice letter sent to individuals is substantially similar to the letter attached hereto as Exhibit "A."

Very truly yours,

Meghan Farally, Esq.  
CIPRIANI & WERNER, P.C.

# Exhibit A



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

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country>>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

We are writing to inform you of a data security incident experienced by Raw Sugar, LLC ("Raw Sugar") that may have involved your information as described below. We take the privacy and security of all information very seriously, and while we have no evidence to suggest that any information was subject to actual or attempted misuse as a result of this incident, this letter includes information about the incident and steps you can take to help protect your information.

**What Happened:** On March 23, 2022, we discovered suspicious activity related to one employee email account. Upon discovery, we took swift action to secure our email system and network. We also launched an internal investigation and engaged leading, independent cybersecurity specialists. Based on this investigation, we confirmed that one employee email account was subject to unauthorized access between January 24, 2022, and January 26, 2022. Upon discovery, we immediately began a thorough review of the contents of the email account to determine the type of information contained within the account and to whom that information related. This process was completed on May 31, 2022. We are now notifying those individuals whose information was potentially impacted by the incident.

**What Information Was Involved:** The types of information contained within the affected email account included your: <<b2b\_text\_1 («name» and data elements)>>.

**What We Are Doing:** We have taken every step necessary to address the incident and are committed to fully protecting all of the information that you have entrusted to us. Upon learning of this incident, we immediately took the steps described above, including performing password resets. We have also implemented additional technical safeguards to further enhance the security of information in our possession and prevent similar incidents from happening in the future. Out of an abundance of caution, we have arranged for you to activate, at no cost to you, an online identity monitoring service for 12 months provided by Kroll. Due to privacy laws, we cannot activate these services for you directly. Additional information regarding how to activate the complimentary identity monitoring service is enclosed. We have also provided additional information about steps you can take to help protect yourself against fraud and identity theft.

**What You Can Do:** We recommend that you remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements for suspicious activity and to detect errors. If you discover any suspicious or unusual activity on your accounts, please promptly contact your financial institution or company. Additionally, you can activate the complimentary identity monitoring service we are making available to you. You can also review the enclosed "Steps You Can Take to Help Protect Your Information" for additional resources.

**For More Information:** Should you have additional questions or concerns regarding this matter, please do not hesitate to contact us at [\[number\]](#), Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding US Holidays. Please have your membership number ready.

The security of information is of the utmost importance to us. We stay committed to protecting your trust in us and continue to be thankful for your support.

Sincerely,

Jonathan Weiss  
Chief Financial Officer

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. 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 (date)>> 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](http://info.krollmonitoring.com).

Additional information describing your services is included with this letter.



## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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

### 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.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

## ADDITIONAL ACTIONS TO HELP PROTECT YOUR INFORMATION

### Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements and explanation of benefits forms for suspicious activity and to detect errors. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus, TransUnion, Experian, and Equifax. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call 1-877-322-8228. Once you receive your credit report, review it for discrepancies and identify any accounts you did not open or inquiries from creditors that you did not authorize. If you have questions or notice incorrect information, contact the credit reporting bureau.

You 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, 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 lasting seven years. Should you wish to place a fraud alert, please contact any of the three credit reporting bureaus listed below.

As an alternative to a fraud alert, you 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 your 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 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., III, etc.);
2. Social Security number;
3. Date of birth;
4. Address for the prior two to five years;
5. Proof of current address, such as a current utility or telephone bill;
6. A legible photocopy of a government-issued identification card (e.g., state driver's license or identification card); 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:

<b>TransUnion</b> 1-800-680-7289 <a href="http://www.transunion.com">www.transunion.com</a> <b>TransUnion Fraud Alert</b> P.O. Box 2000 Chester, PA 19016-2000 <b>TransUnion Credit Freeze</b> P.O. Box 160 Woodlyn, PA 19094	<b>Experian</b> 1-888-397-3742 <a href="http://www.experian.com">www.experian.com</a> <b>Experian Fraud Alert</b> P.O. Box 9554 Allen, TX 75013 <b>Experian Credit Freeze</b> P.O. Box 9554 Allen, TX 75013	<b>Equifax</b> 1-888-298-0045 <a href="http://www.equifax.com">www.equifax.com</a> <b>Equifax Fraud Alert</b> P.O. Box 105069 Atlanta, GA 30348-5069 <b>Equifax Credit Freeze</b> P.O. Box 105788 Atlanta, GA 30348-5788
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#### Additional Information

You can further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the credit reporting bureaus, the Federal Trade Commission (FTC), or your state Attorney General. The FTC also encourages those who discover that their information has been misused to file a complaint with them. The FTC may be reached at 600 Pennsylvania Ave. NW, Washington, D.C. 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

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, your state Attorney General, and the FTC. 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 St. NW Washington, D.C. 20001; 202-727-3400; and [oag@dc.gov](mailto:oag@dc.gov). [Raw Sugar, LLC](#) may be contacted at [address].

*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). [Raw Sugar, LLC](#) may be contacted at [address].

*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](http://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](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.riag.ri.gov](http://www.riag.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 incident. [There are \[#\] Rhode Island residents impacted by this incident.](#)