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COUGHLIN<sub>LLC</sub>  
ATTORNEYS AT LAW

RECEIVED

APR 04 2022

CONSUMER PROTECTION

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40 Burton Hills Boulevard, Suite 200  
Nashville, TN 37215

March 29, 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 Youth Consultation Service ("YCS"), located at 284 Broadway, Newark, NJ 07104, and are writing to notify your office of an event that may affect the security of some personal information relating to approximately seven (7) New Hampshire residents. This notice may be supplemented if new significant facts are learned subsequent to its submission. By providing this notice, YCS 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 May 21, 2021, YCS discovered that the servers at its YCS Foundation location were inaccessible. YCS responded to this incident immediately and began an investigation. Through its investigation and response, YCS determined that an unauthorized individual(s) had gained access to certain parts of its computer network between April 13, 2021, and May 21, 2021. YCS's investigation further revealed that the unknown individual(s) viewed and/or took certain files during that time. Therefore, YCS worked with third-party data review specialists to perform a comprehensive review of the contents of the affected files to determine what information was contained therein and to whom the information related. YCS then conducted a manual review of its internal records to locate address information for potentially impacted individuals and determine its relationship to those individuals in order to provide accurate and complete notices, which was completed on February 16, 2022.

The information that could have been subject to unauthorized access includes name, address, and financial account information.

### **Notice to New Hampshire Residents**

On or about March 29, 2022, YCS provided written notice of this event to affected individuals, which includes approximately seven (7) 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 discovering the event, YCS moved quickly to investigate and respond to the incident, assess the security of YCS systems, and notify potentially affected individuals. YCS is also working to implement additional safeguards and training to its employees. YCS also established a dedicated toll-free assistance line to address questions or concerns from notified individuals.

Additionally, YCS is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. YCS is providing individuals 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. YCS is also reporting this event to other appropriate state regulators.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1345.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alexandria N. Murphy".

Alexandria N. Murphy of  
MULLEN COUGHLIN LLC

# **EXHIBIT A**



*Embracing All the Possibilities*

P.O. Box 1907  
Suwanee, GA 30024

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

March 28, 2022

<<Variable heading - Re: Notice of Data Breach>>

Dear <<First Name>> <<Last Name>>,

Youth Consultation Service ("YCS") is committed to protecting the security and confidentiality of the information we receive as a result of the services we provide. We are writing to make you aware of a recent incident that may affect the privacy of some of your information. Although at this time there is no indication that your information has been used for a fraudulent purpose in relation to this incident, we are providing you with information about the incident, our response to it, and steps you can take to protect your information against the possibility of identity theft and fraud, should you feel it appropriate to do so.

**What Happened?** On or about May 21, 2021, YCS discovered that the servers at its YCS Foundation location were inaccessible. We responded to this incident immediately and began an investigation to assess the security of our systems and to confirm the full nature and scope of the activity. Through our investigation and response, we determined that an unknown individual(s) had gained access to certain parts of our computer network between April 13, 2021 and May 21, 2021. The investigation further revealed that the unknown individual(s) viewed and/or took certain files during that time. Accordingly, YCS, with the assistance of data review specialists, undertook a comprehensive and time-intensive review of the contents of the affected files to determine what information was contained therein and to whom the information related. We then conducted a manual review of our internal records to locate address information for potentially impacted individuals and determine our relationship to those individuals in order to provide accurate and complete notices. We are providing notice to you because our review recently completed on or about February 16, 2022, and we determined that information related to you was present in the affected files.

**What Information Was Involved?** While we currently have no evidence of identity theft or fraud in connection with this incident, the investigation determined the following types of your information were potentially impacted: <<Impacted Data>>.

**What We Are Doing.** In response to the incident, YCS has taken the following actions to mitigate the risk of compromise to your information and to better prevent a similar event from recurring: (1) changed user passwords; (2) implemented enhanced technical safeguards to strengthen the security of the YCS environment; (3) monitored network activity and remediated any suspicious activity, with the assistance of third-party specialists; and (4) began providing notification to potentially impacted individuals as quickly as possible. Further, we are adapting our existing employee training protocols relating to data protection and security. We also notified federal law enforcement authorities of the incident and provided relevant regulatory notices, including notice to the Department of Health and Human Services.

**What You Can Do** We encourage you to remain vigilant against incidents of identity theft and fraud, by reviewing your account statements and explanation of benefits, and monitoring free credit reports for suspicious activity. Additional information and resources are included in the enclosed *Steps You May Take to Help Protect Personal Information*.

**For More Information.** If you have any questions regarding this incident that are not addressed in this letter, please contact us at 1-833-648-2052 (toll free), Monday through Friday from 9 am to 9 pm ET, excluding U.S. holidays. You may also write to YCS at 284 Broadway, Newark, NJ 07104.

We sincerely apologize for any concern this incident may have caused you. YCS remains committed to safeguarding the privacy and security of the information entrusted to us.

Sincerely,

A handwritten signature in cursive script, reading "Tara Augustine LCSW".

Tara Augustine, LCSW  
President/CEO  
Youth Consultation Service

## STEPS YOU MAY TAKE TO HELP PROTECT PERSONAL INFORMATION

### Monitor 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 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, 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:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<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>
1-888-298-0045	1-888-397-3742	1-833-395-6938
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. 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 St. NW, Washington, D.C. 20001; 202-727-3400; and [oag@dc.gov](mailto: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 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.