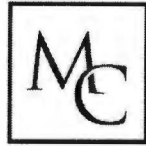


RECEIVED

MAY 16 2022



**MULLEN  
COUGHLIN LLC**  
ATTORNEYS AT LAW

CONSUMER PROTECTION

Josh Brian  
Office: (267) 930-2405  
Fax: (267) 930-4771  
Email: JBrian@mullen.law

3001 N. Rocky Point Drive East, Suite 200  
Tampa, FL 33607

May 13, 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 48forty Solutions, LLC ("48forty") located at 13100 Northwest Fwy, Ste. 450, Houston, TX 77040, and are writing to notify your office of an event that may affect certain information relating to approximately ten (10) New Hampshire residents. This notice may be supplemented if any new, material facts are learned subsequent to its submission. By providing this notice, 48forty 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**

48forty identified unusual activity on its network and, in response, commenced an investigation into the activity to determine its nature and scope. 48forty subsequently determined that on or about December 31, 2021, certain files were downloaded. To determine what information was contained in the files, and to whom it related so that 48forty could provide notification to individuals, it performed a diligent review of the files, which was completed on or around April 27, 2022. The following categories of information were identified in the reviewed files: name and Social Security number.

**Notice to New Hampshire Residents**

On or about May 13, 2022, 48forty provided written notice of this event to approximately ten (10) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Mullen.law

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

Upon detecting the event, 48forty moved quickly to investigate and respond, assess the security of 48forty systems, and identify potentially affected individuals. Further, 48forty notified federal law enforcement regarding the event. 48forty is also working to implement additional safeguards to mitigate reoccurrence of this type of event. Additionally, 48forty is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose information was potentially affected by this event, at no cost to these individuals.

Additionally, 48forty is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud. 48forty 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.

48forty is providing written notice of this event to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the event, please contact us at (267) 930-2405.

Very truly yours,



Josh Brian of  
MULLEN COUGHLIN LLC

JPB/dtg  
Enclosure

# **EXHIBIT A**



Return Mail Processing  
PO Box 999  
Suwanee, GA 30024

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SAMPLE A. SAMPLE - IO I

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ANYTOWN, US 12345-6789

11.....h1

May 13, 2022

[Extra I]

Dear Sample A. Sample:

48forty Solutions, LLC ("48forty") writes to inform you of an event that may impact your information. We are providing you with information about the event, our response, and steps you may take, should you feel it is appropriate to do so.

**What Happened?** We identified unusual activity on our network and, in response, commenced an investigation into the activity to determine its nature and scope. We subsequently determined that on or about December 31, 2021, certain files were downloaded. To determine what information was contained in the files, and to whom it related so that we could provide notification to individuals, we performed a diligent review of the files, which was completed on or around April 27, 2022.

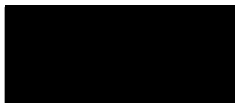
**What Information was Involved?** The following information was identified in the reviewed files: your name and [Extra2].

**What We Are Doing.** We take this event and the security of information in our care very seriously. As part of our ongoing commitment to the privacy of information in our care, we implemented additional technical security measures. We are also reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event. Additionally, as an added precaution, we are offering you complimentary access to identity monitoring through Experian.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and free credit reports for suspicious activity and to detect errors. We highly recommend you review the "Steps You Can Take to Help Protect Your Information" section of this letter. Further, we encourage you to enroll in the offered identity monitoring services, at no cost to you.

**For More Information.** If you have additional questions, please contact our dedicated assistance line at (833) 637-2022, Monday through Friday, from 6 a.m. to 8 p.m. PST; Saturday and Sunday, from 8 a.m. to 5 p.m. PST (excluding U.S. holidays). You may also write to 48forty Solutions, LLC at 48forty Solutions, General Counsel, at 13100 Northwest Fwy, Ste. 450, Houston, TX 77040 or legal@48forty.com. We regret any inconvenience or concern this event may cause.

Sincerely,



Mike Hachtman  
CEO  
48forty Solutions, LLC

## Steps You Can Take to Help Protect Your Information

### Enroll in Monitoring Services

To help protect your identity, we are offering a complimentary [12/24]-month membership of Experian's IdentityWorks<sup>8M</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: August 31, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

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 (833) 637-2022 by **August 31, 2022**. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the identity restoration services by Experian.

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 agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™** : 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\*\***: Provides coverage for certain costs and unauthorized electronic fund transfers.

### 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 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.

\* 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.

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 a consumer's name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in consumers' credit reports may delay, interfere with, or prohibit the timely approval of any subsequent request or application made 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 security freeze, you may need to provide some or all of 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:

<b>Equifax</b>	<b>Experian</b>	<b>Trans Union</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	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.identiMheft.gov](http://www.identiMheft.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 6<sup>th</sup> Street, 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 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-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 event. There are approximately 25 Rhode Island residents that may be impacted by this event.