



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

November 15, 2023

VIA E-MAIL

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Adams Bank & Trust (“ABT”) located at 315 N Spruce Street, P.O. Box 720, Ogallala, Nebraska, 69153, and write to notify your office of an incident that may affect the security of certain personal information relating to five (5) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, ABT 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 May 16, 2023, ABT discovered some suspicious activity on its systems. ABT immediately took their systems offline and took steps to ensure the security of the network. ABT also launched an investigation into the nature and scope of the event. The investigation determined that an unauthorized actor gained access to certain ABT systems between May 15, 2023, and May 16, 2023. Initially, the investigation found no evidence that any data had been accessed or acquired. However, on September 15, 2023, ABT discovered additional information that indicated certain files containing customer information were taken.

The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On or about November 15, 2023, ABT provided written notice of this incident to five (5) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, ABT moved quickly to investigate and respond to the incident, assess the security of ABT systems, and identify potentially affected individuals. Further, ABT notified federal law enforcement regarding the event. ABT is also working to implement additional safeguards and training to its employees. ABT is providing access to credit monitoring services for _____, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, ABT 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. ABT is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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. ABT is also providing notice of this incident to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion. ABT also notified federal law enforcement and is cooperating with its investigation.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at _____.

Very truly yours,

Richard Aponte-Boyd of
MULLEN COUGHLIN LLC

RAB/jlm
Enclosure

EXHIBIT A



P.O. Box 989728
West Sacramento, CA 95798-9728

<<FIRST NAME>> <<LAST NAME>>
<<ADDRESS1>>
<<ADDRESS2>>
<<CITY>>, <<STATE>> <<ZIP>>
<<Country>>

November 15, 2023

NOTICE OF <<Variable Header>>

Dear <<FIRST NAME>> <<LAST NAME>>:

Adams Bank & Trust (“ABT”) writes to inform you of an event that may affect some of your information. ABT takes this event very seriously and the confidentiality, privacy, and security of information in our care is one of our highest priorities. While ABT is not aware of any actual or attempted misuse of any information, we are providing you with an overview of the event, our response, and resources to help further protect your information, should you feel it necessary to do so.

What Happened?

On May 16, 2023, ABT discovered some suspicious activity on our systems. ABT immediately took systems offline and took steps to ensure the security of the network. ABT also launched an investigation into the nature and scope of the event. The investigation determined that an unauthorized actor gained access to certain ABT systems between May 15, 2023 and May 16, 2023. Initially, the investigation found no evidence that any data had been accessed or acquired. However, on September 15, 2023, ABT discovered additional information that indicated certain files were acquired by the unauthorized actor. We are notifying you because certain information related to you was contained in the files taken.

What Information Was Involved?

The information within the impacted files that relates to you may have included your

What We Are Doing.

ABT takes this event and the security of information in our care very seriously. Upon learning of the event, we moved quickly to respond and investigate the event and assess the security of our network. ABT also notified law enforcement and has notified relevant regulators, as required. As part of our ongoing commitment to information security, we have reviewed our policies and procedures and have taken significant steps to strengthen our security and system monitoring to reduce the risk of a similar event from occurring in the future.

ABT is also offering you <<12/24>> months of complimentary credit monitoring through IDX. You must enroll in these services as ABT cannot do so on your behalf. Enrollment instructions can be found in the enclosed *Steps You Can Take to Help Protect Your Information* below.

What You Can Do.

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, which includes further information on what you can do to protect your information against misuse, should you feel it necessary to do so. Additionally, ABT encourages you to enroll in the complimentary credit monitoring being offered.

For More Information.

ABT understands you may have questions about this event not addressed in the letter. If you have additional questions, please contact our dedicated assistance line at 1-888-867-1937, Monday through Friday from 8:00 am to 8:00 pm Central Time. You may also write to ABT at 315 N Spruce Street, P.O. Box 720, Ogallala, NE 69153.

We sincerely apologize for any inconvenience this may cause.

Sincerely,

Adams Bank & Trust

Steps You Can Take To Help Protect Your Information

Enroll in Monitoring Services

1. Website and Enrollment. Scan the QR image or go to <https://response.idx.us/ABT> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the enrollment deadline is February 15, 2024.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-888-867-1937 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 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 their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft or fraud should also be reported to your financial institution, law enforcement and the relevant 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, D.C. 20001; (202) 442-9828; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting 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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 0 Rhode Island residents that may be impacted by this event.