

# BakerHostetler

## Baker&Hostetler LLP

Key Tower  
127 Public Square, Suite 2000  
Cleveland, OH 44114-1214

T 216.621.0200  
F 216.696.0740  
www.bakerlaw.com

William H. Berglund  
direct dial: 216.861.7416  
wberglund@bakerlaw.com

June 10, 2021

### VIA E-MAIL (DOJ-CPB@DOJ.NH.GOV)

Attorney General Gordon MacDonald  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

Dear Attorney General MacDonald:

We are writing on behalf of our client, Alderson Broaddus University (“Alderson Broaddus”), to notify you of a security incident involving New Hampshire residents. Alderson Broaddus is a private university located in Philippi, West Virginia.

Alderson Broaddus completed an investigation into unauthorized access to some of its computer systems. Upon discovering the incident, Alderson Broaddus immediately took steps to secure its network, contacted law enforcement, and began an investigation with the assistance of a cybersecurity firm. The investigation determined that an unauthorized person obtained access to some of the university’s systems at various times between January 22, 2021 and January 27, 2021, and took some files out of its network. Alderson Broaddus was not able to fully determine the files that were taken and so conducted a review of the files that may have been involved. On April 29, 2021, Alderson Broaddus determined that the personal information of 17 individuals subsequently confirmed to be New Hampshire residents was contained in the files, including the individuals’ name and Social Security number.

Beginning today, June 10, 2021, Alderson Broaddus will mail written notification to the New Hampshire residents via First Class U.S. Mail. A sample copy of the notification letter is enclosed.<sup>1</sup> Alderson Broaddus is providing each of the New Hampshire residents complimentary, one-year memberships to credit monitoring, fraud consultation, and identity theft restoration services through Kroll. Alderson Broaddus is recommending that the individuals remain vigilant to the possibility of fraud or identity theft by reviewing their account statements for unauthorized

<sup>1</sup> This notice does not waive Alderson Broaddus’s objection that New Hampshire lacks personal jurisdiction over it related to any claims that may arise from this incident.

June 10, 2021

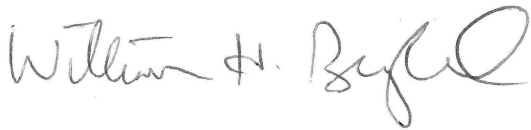
Page 2

activity. Alderson Broaddus has also established a dedicated call center that individuals may call with related questions.

To further protect information in its systems, Alderson Broaddus has implemented additional safeguards and technical security measures, including multi-factor authentication, additional password requirements, migrating systems to an additional endpoint detection and response tool, and third-party network monitoring.

Please do not hesitate to contact me if you have any questions regarding this incident.

Sincerely,

A handwritten signature in black ink that reads "William H. Berglund". The signature is written in a cursive style with a large, stylized initial "W".

William H. Berglund  
Counsel



<<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>>,

At Alderson Broaddus University, we understand the importance of protecting the information we maintain. I am writing to inform you of an incident that may have involved some of your information. This notice explains the incident, measures we have taken, and some steps that you may consider taking.

We completed an investigation into unauthorized access to some of our computer systems. Upon discovering the incident, we immediately took steps to secure our network, contacted law enforcement, and began an investigation with the assistance of a cybersecurity firm. Our investigation determined that an unauthorized person obtained access to some of our systems at various times between January 22, 2021 and January 27, 2021, and took some files out of our network. We were not able to fully determine the files that were taken and so conducted a review of the files that may have been involved. On April 29, 2021, we determined that some of your information was contained in the files that may have been taken by the unauthorized person, including your name and Social Security number.

While we have no indication that your information has been or will be misused, we wanted to notify you of this incident and assure you that we take it very seriously. Out of an abundance of caution, we have secured the services of Kroll to provide identity monitoring services at no cost to you for one year. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.

You have until <<Date>> to activate your identity monitoring services.

Membership Number: <<Member ID>>

For instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take in response to the incident, please see the additional information provided in this letter.

Your confidence and trust are important to us, and we regret any inconvenience or concern this incident may cause. To further protect information in our systems, we have implemented additional safeguards and technical security measures, including multi-factor authentication and additional password requirements. If you have any questions, please call 1-???-??-??-???? from 9:00 am to 6:30 pm Eastern time, Monday through Friday.

Sincerely,

Carol Weaver  
Director, Information Technology



## **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

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

### **Triple Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will 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.

## ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com), 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

### **Fraud Alerts and Credit or Security Freezes:**

***Fraud Alerts:*** There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

***Credit or Security Freezes:*** You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

***How do I place a freeze on my credit reports?*** There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com)
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

***How do I lift a freeze?*** A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

You may contact Alderson Broaddus University by phone at (304) 457-1700 or by mail at 101 College Hill Drive, Philippi, WV 26416.

**Additional information for residents of the following states:**

**Maryland:** You may contact and obtain information from your state attorney general at:

*Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, [www.oag.state.md.us](http://www.oag.state.md.us).

**New York:** You may contact and obtain information from these state agencies:

*New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>

*New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

**North Carolina:** You may contact and obtain information from your state attorney general at:

*North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov)

**Rhode Island:** This incident involves 25 individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at:

*Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, [www.riag.ri.gov](http://www.riag.ri.gov)

**West Virginia:** You have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

**A Summary of Your Rights Under the Fair Credit Reporting Act:** The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies 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 reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.