



LEWIS BRISBOIS BISGAARD & SMITH LLP

Kevin Yoegel
550 E. Swedesford Road, Suite 270
Wayne, PA 19087
Kevin.Yoegel@lewisbrisbois.com
Direct: 215.253.4255

April 22, 2021

VIA E-MAIL

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
Email: DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General:

We represent All Spectrum Insurance Brokers (“ASI”), an insurance agency located in San Jose, California. This letter is being sent because the personal information of one (1) New Hampshire resident may have been affected by a recent data security incident experienced by ASI. The incident may have involved unauthorized access to one (1) resident’s name and driver’s license number.

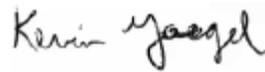
On November 12, 2020, ASI detected unusual activity in an ASI employee email account. Upon discovering this activity, ASI immediately took steps to secure the account and launched an investigation with the assistance of a leading, independent forensics firm engaged to determine what happened and whether sensitive information was accessed or acquired without authorization as a result. As a result of this investigation, ASI learned that certain ASI employee email accounts had been accessed without authorization. ASI then conducted a comprehensive review of the contents of the accounts and, on March 8, 2021, determined that the impacted ASI employee email accounts likely contained personal information belonging to certain individuals. ASI then worked diligently through March 29, 2021 to identify address information required to provide notification.

ASI notified one (1) potentially affected New Hampshire resident of this incident via the attached sample letter, or a substantially similar version, on April 22, 2021. In so doing, ASI offered complimentary credit monitoring and identity theft restoration services for one year through Kroll, a global leader in risk mitigation and response. These services include Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

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Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Kevin Yoegel". The signature is written in a cursive style with a clear, legible font.

Kevin Yoegel of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Encl: Sample Consumer Notification Letter



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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Re: Notice of Data Security Incident

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

We are writing to inform you of a data security incident experienced by All Spectrum Insurance Brokers ("ASI") that may have affected your personal information. As explained below, we recently learned that an unauthorized individual gained access to certain ASI employee email accounts that contained some of your personal information. We are writing to notify you of this incident, to offer you complimentary identity monitoring services to assist you, and to inform you about steps that can be taken to help protect your personal information.

What Happened? On November 12, 2020, we detected unusual activity relating to an ASI employee email account. Upon discovering this activity, we immediately took steps to secure our email system and launched an investigation. In connection therewith, we engaged a leading, independent forensics firm to determine what happened and whether sensitive information was accessed or acquired without authorization as a result. As a result of this investigation, we learned that certain ASI employee email accounts had been accessed without authorization between approximately October 28 and November 12, 2020. We then conducted a comprehensive review of the contents of the accounts and, on March 8, 2021, learned that the impacted ASI employee email accounts contained some of your personal information. We then worked diligently to identify current address information required to provide notification as required by law.

Please note that this unauthorized access was limited to information transmitted via email and did not affect any other information systems. In addition, ASI is currently not aware of the misuse of any potentially affected information.

What Information Was Involved? The following information was contained within the email accounts: your <<b2b_text_1(ImpactedData)>>.

What We Are Doing. As soon as we discovered this incident, we took the steps referenced above. We also applied enhanced security measures to our email system in order to help prevent a similar incident from occurring in the future. In addition, we reported this matter to the Federal Bureau of Investigation and will provide whatever assistance is necessary to hold the perpetrator(s) of this incident accountable. Finally, out of an abundance of caution, we are now offering you complimentary identity monitoring services through Kroll, a global leader in risk mitigation and response. These services include Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

What You Can Do. We recommend that you activate your complimentary services from Kroll. Activation instructions and a description of the services being provided are included with this letter. We also recommend that you review the guidance included with this letter about how to help protect your personal information.

For More Information. If you have questions or need assistance, please contact Kroll at [1-XXX-XXX-XXXX](tel:1-XXX-XXX-XXXX), Monday through Friday from 9 a.m. to 6:30 p.m. Eastern Time, excluding major US holidays. Kroll representatives are fully versed on this incident and can answer any questions you may have regarding the protection of your personal information.

Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dmitry Lazarev', with a stylized flourish at the end.

Dmitriy Lazarev
Insurance Broker
All Spectrum Insurance Brokers

Steps You Can Take to Further Protect Your Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting www.annualcreditreport.com/, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at www.annualcreditreport.com/cra/requestformfinal.pdf. You also can contact one of the following three national credit reporting agencies:

TransUnion P.O. Box 1000 Chester, PA 19016 1-800-916-8800 www.transunion.com	Experian P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	Equifax P.O. Box 105851 Atlanta, GA 30348 1-800-525-6285 www.equifax.com	Free Annual Report P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 www.annualcreditreport.com
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Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at www.annualcreditreport.com.

Security Freeze: You have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. There is no charge to place, lift or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov, and www.ftc.gov/idtheft 1-877-438-4338	Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 www.oag.state.md.us 1-888-743-0023	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 www.ncdoj.gov 1-877-566-7226	Rhode Island Attorney General 150 South Main Street Providence, RI 02903 www.riag.ri.gov 1-401-274-4400
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You also have certain rights under the Fair Credit Reporting Act (FCRA), including: to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information, as well as others. For more information about the FCRA, and your rights pursuant to the FCRA, please visit files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

KROLL

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, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

*You have until **July 21, 2021** to activate your identity monitoring services.*

Membership Number: <<Member ID>>

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.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

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.