



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

RECEIVED

JUN 14 2022

CONSUMER PROTECTION

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309 Fellowship Road, Suite 200  
Mt. Laurel, NJ 08054

June 10, 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 continue to represent Alliance Physical Therapy Group, LLC (“APTG”) located at 625 Kenmoor Avenue SE, Suite 100, Grand Rapids, MI, 49546 and are writing to supplement our February 23, 2022 notice to your office. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, APTG 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.

After APTG’s internal review of a portion of the potentially accessible information, APTG engaged the assistance of third-party specialists on February 7, 2022 to undertake a programmatic and manual review of the remaining potentially accessible information. On April 19, 2022, this review concluded, and it was determined that the accessible information included personal information. Thereafter, APTG performed an internal review of its records for address information in order to notify potentially affected individuals and recently concluded that effort.

On or about June 10, 2022, APTG provided written notice of this incident to approximately thirty-six (36) additional New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

The information that could have been subject to unauthorized access includes name, address, and Social Security number.

Office of the Attorney General  
June 10, 2022  
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Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1529.

Very truly yours,

James Monagle of  
MULLEN COUGHLIN LLC

JZM/jcj  
Enclosure

# **EXHIBIT A**



Return Mail Processing Center  
 P.O. Box 6336  
 Portland, OR 97228-6336

<<Mail ID>>  
 <<Name 1>>  
 <<Name 2>>  
 <<Address 1>>  
 <<Address 2>>  
 <<Address 3>>  
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 <<City>><<State>><<Zip>>  
 <<Country>>

<<Date>>

**NOTICE OF <<VARIABLE HEADER>>**

Dear <<Name 1>>:

Alliance Physical Therapy Group, LLC (“APTG”), which was formerly known as Agility Health, writes to inform you of a recent incident that may affect the security of some of your personal information. APTG is also affiliated with Arrow Physical Therapy & Rehabilitation, formerly known as Accelerated Physical Therapy, and Armor Physical Therapy, formerly known as Agility Health Physical Therapy. This notice provides information about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

**What Happened?** On or around December 27, 2021, APTG became aware of suspicious activity affecting certain systems within our network. APTG immediately launched an investigation, with the assistance of third-party specialists, to confirm the full nature and scope of the activity and restore functionality to the affected systems. On January 7, 2022, it was determined that certain personal information on APTG systems may have been accessed without authorization between December 23, 2021 and December 27, 2021. On February 7, 2022, APTG engaged the assistance of third-party specialists to undertake a programmatic and manual review of the potentially accessible information. On April 19, 2022, this review concluded, and it was determined that the accessible information included personal information. Thereafter, APTG performed an internal review of our records for address information in order to notify potentially affected individuals and recently concluded that effort.

**What Information Was Involved?** The information related to you that may have been accessed may include your name and the following: <<Breached Elements>>.

**What We Are Doing.** We take the security of information entrusted to us seriously and apologize for any inconvenience this incident may cause. As part of our ongoing commitment to the security of information within our care, APTG is reviewing our existing policies and procedures regarding cybersecurity and implementing additional measures and safeguards to protect against this type of incident in the future.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account and monitoring your free credit reports for suspicious activity. You may also review the information contained in the attached *Steps You Can Take to Protect Personal Information*. Although we are not aware of any actual or attempted misuse of your personal information, as an added precaution, we have arranged to offer you access to <<CM Length>> months of complimentary credit monitoring and identity restoration services provided through Equifax. Although we are making these services available to you, we are unable to enroll you directly. For enrollment instructions, please review the information contained in the attached *Steps You Can Take to Protect Personal Information*.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call us at 855-960-3503, Monday through Friday, during the hours of 9:00 a.m. – 9:00 p.m. Eastern Time (excluding major holidays).

Sincerely,

Tiffany Warden  
Corporate Compliance and Privacy Officer  
[www.alliancept.com](http://www.alliancept.com)

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### Enroll in Credit Monitoring and Identity Restoration

Enter your Activation Code: <ACTIVATION CODE>

Enrollment Deadline: <Enrollment Deadline>

### Equifax Credit Watch™ Gold

\*Note: You must be over age 18 with a credit file to take advantage of the product

#### Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications<sup>1</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>2</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>3</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>4</sup>

#### Enrollment Instructions

Go to [www.equifax.com/activate](http://www.equifax.com/activate)

Enter your unique Activation Code of <<ACTIVATION CODE>> then click "Submit" and follow these 4 steps:

1. **Register:**  
Complete the form with your contact information and click "Continue".  
*If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4*
2. **Create Account:**  
Enter your email address, create a password, and accept the terms of use.
3. **Verify Identity:**  
To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:**  
Upon successful verification of your identity, you will see the Checkout Page.  
Click 'Sign Me Up' to finish enrolling.  
**You're done!**  
The confirmation page shows your completed enrollment.  
Click "View My Product" to access the product features.

#### 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.

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

<sup>1</sup> WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

<sup>2</sup> The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

<sup>3</sup> Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit [www.optoutprescreen.com](http://www.optoutprescreen.com).

<sup>4</sup> The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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 security 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, 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:

Equifax	Experian	TransUnion
<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>
888-298-0045	1-888-397-3742	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

Additionally, if your username and password were affected, it is recommended that you promptly change your password and security question and answer, as applicable, or take other steps appropriate to protect the potentially accessible online account information and all other online accounts for which the same username, email address, password, and security question and answer are used.

**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 Street, NW, Washington, DC 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). APTG is located at 625 Kenmoor Avenue SE, Suite 100, Grand Rapids, MI, 49546.

*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/t/201504\\_cfbp\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/t/201504_cfbp_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.rinag.ri.gov](http://www.rinag.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.