



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

RECEIVED  
AUG 23 2022  
CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200  
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August 19, 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 American Cutting Edge (“ACE”), located at 4475 Infirmary Road, Miamisburg, OH 45342, and are writing to notify your office of an event that may affect the security of certain personal information relating to approximately four (4) New Hampshire residents. This notice may be supplemented if significant new facts are learned subsequent to its submission. By providing this notice, ACE 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 or about July 1, 2022, ACE became aware of suspicious activity related to its e-commerce website, [www.americancuttingedge.com](http://www.americancuttingedge.com). ACE immediately launched an investigation, with the assistance of third-party digital forensic specialists, to determine the nature and scope of the event. The investigation recently determined that that an unknown individual gained access to certain customer payment information entered into the website between April 20, 2022 and July 1, 2022. ACE’s remediation efforts removed access to customer information on that date. Once the forensic investigation was complete, ACE undertook a thorough review of its records to determine which customers made purchases during that period. ACE recently concluded this review.

The information that could have been subject to unauthorized access for New Hampshire residents includes name, address, and payment card information.

### **Notice to New Hampshire Residents**

On or about August 19, 2022, ACE provided written notice of this event to potentially affected individuals, including approximately four (4) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached hereto as *Exhibit A*.

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

Upon becoming aware of the event, ACE moved quickly to investigate and respond, assess the security of its systems and e-commerce platform, and identify potentially affected individuals. ACE also implemented additional information security safeguards. ACE is providing potentially affected individuals with complimentary access to one year of identity restoration and consultation services through Kroll.

Additionally, ACE is providing potentially affected 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. ACE is providing individuals with information on how to place a fraud alert and credit 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. ACE is also providing written notice of this event to appropriate state regulators.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4802.

Very truly yours,

Samuel Sica, III of  
MULLEN COUGHLIN LLC

SZS/aml  
Enclosure

# **EXHIBIT A**



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

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country>>

<<b2b\_text\_1(Notice of Data Event - CA residents only)>>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>:

American Cutting Edge (“ACE”) is writing to inform you of a recent event that may impact the security of some of your information. This notice provides information about the event, our response, and resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

**What Happened?** On or about July 1, 2022, we became aware of suspicious activity related to our e-commerce website, [www.americancuttingedge.com](http://www.americancuttingedge.com). We immediately launched an investigation to determine the nature and scope of the event. The investigation recently determined that an unknown individual gained access to certain customer payment information entered into the website between April 20, 2022 and July 1, 2022. Our remediation efforts removed access to customer information on that date. Once the investigation was complete, ACE undertook a thorough review of our records to determine which customers made purchases during that period. ACE recently concluded this review.

**What Information Was Involved?** Our records indicate you made a purchase on our website during the above time period. Therefore, the following information related to you may have been impacted: name, address, and payment card information, including card number, security code, and expiration date.

**What We Are Doing.** The confidentiality, privacy, and security of information in our care are among our highest priorities. Upon learning of the event, we moved quickly to investigate and respond to the event, assess the security of our systems, and notify potentially affected individuals. As an additional precaution, we are offering complimentary identity restoration and consultation services for one year through Kroll.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and credit reports for suspicious activity and to detect errors. You should report any suspicious activity promptly to your bank or financial institution. You may also review the additional information and resources in the enclosed *Steps You Can Take To Protect Personal Information*, including further details regarding the complimentary identity restoration and consultation services being offered to you.

**For More Information.** If you have additional questions, please call the toll-free dedicated assistance line at 1-??-??-???, Monday through Friday from 8:00 am to 5:30 pm CT excluding major U.S. holidays. You may also write to ACE at 4475 Infirmary Road, Miamisburg, OH 45342.

Sincerely,

American Cutting Edge

## *STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION*

### **Identity Restoration and Consultation Services**

To help relieve concerns and restore confidence following this event, we have secured the services of Kroll to provide Fraud Consultation and Identity Theft Restoration 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 Membership Number is: <<Membership Number s\_n>>



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

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

#### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes interpreting how personal information is accessed and used, explaining your rights and protections under the law, assistance with fraud alerts, and showing you the most effective ways to protect personal information, including investigating suspicious activity that could be tied to an identity theft event.

#### **Identity Theft Restoration**

An experienced Kroll licensed investigator will work on your behalf to resolve issues related to identity theft. You will have access to a dedicated investigator who understands your issues and will do most of the work for you. Your investigator will be able to dig deep to uncover all aspects of the identity theft, and then work to resolve it.

### **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 one-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 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 credit 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:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</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>
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

### **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. 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 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 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/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 **five (5)** Rhode Island residents impacted by this event.