

January 25, 2021

Michael E. Kar, Esq.
212.915.5535 (direct)
Michael.Kar@WilsonElser.com

Via electronic-mail: DOJ-CPB@doj.nh.gov

Attorney General Gordon McDonald

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Re: Our Client : American Frame Corporation
Matter : Data Security Incident on August 1, 2020
Wilson Elser File # : 16516.01108

Dear Attorney General McDonald:

We represent American Frame Corporation (“AFC”), located in Maumee, Ohio with respect to a potential data security incident described in more detail below. AFC takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of New Hampshire residents being notified, what information has been compromised, and the steps that AFC is taking to secure the integrity of its systems. We have also enclosed hereto a sample of the notification made to the potentially impact individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

AFC is a custom frame and art printing service. On August 1, 2020, AFC detected that it was the target of a cybersecurity attack. An unauthorized third party attempted to infiltrate AFC’s computer network, encrypt AFC’s data, and then demand a ransom payment in exchange for decryption. Through this compromise, it is possible that certain individuals’ full name, mailing address, and either social security number or credit card information was exposed to cybercriminals.

2. Number of New Hampshire Residents Affected

A total of two hundred and sixty-six (266) residents of New Hampshire were potentially affected by this security incident. Notification letters to these individuals were mailed on January 14, 2021, by first class mail. A sample copy of the notification letter is included with this letter.

150 East 42nd Street • New York, NY 10017 • p 212.490.3000 • f 212.490.3038

Albany • Atlanta • Austin • Baltimore • Beaumont • Boston • Chicago • Dallas • Denver • Edwardsville • Garden City • Hartford • Houston • Indiana • Kentucky
Las Vegas • London • Los Angeles • Miami • Michigan • Milwaukee • New Jersey • New Orleans • New York • Orlando • Philadelphia • Phoenix • San Diego
San Francisco • Sarasota • Stamford • Virginia • Washington, DC • West Palm Beach • White Plains

wilsonelser.com

3. Steps Taken

Upon detecting this incident, AFC moved quickly to initiate its incident response, which included conducting an investigation with the assistance of third-party forensic specialists and confirming the security of its network environment. AFC has reviewed and altered its tools, policies, and procedures relating to the security of its systems and servers, as well as its information life cycle management.

AFC values the safety of its customers' personal information and is therefore offering credit monitoring and identity theft protection services through ID Experts Corp. ("IDX"). IDX's services include: at least 12 months of credit monitoring and fully managed ID theft recovery services. With this protection, IDX will help the affected individuals resolve issues if their identity is compromised. Consumer contact information for IDX is included in the attached notification letter.

4. Contact Information

AFC remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Michael.Kar@WilsonElser.com or 212.915.5535.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Michael E. Kar, Esq.

Copy: Robert Walker, Esq. (Wilson Elser LLP); Sean Bowen, Esq. (Wilson Elser LLP)

Enclosure: *Sample Notification Letter*



Picture Frames | Framing Supplies | Fine Art Printing

C/O IDX
PO Box 4129
Everett WA 98204

ENDORSE



NAME

ADDRESS1

ADDRESS2



SEQ
RCODE2D
Ver 3PII

CSZ

COUNTRY

BREAK

400 Tomahawk Dr.
Maumee, Ohio 43537-1654
AmericanFrame.com

To enroll, please call: 833-754-1801

Or visit: <https://response.idx.us/frame>

Enrollment code: <<XXXXXXXXXX>>

January 14, 2021

Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

We are writing in order to inform you of an incident that may have exposed your sensitive personal information. We take the security of your personal information seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved:

American Frame Corporation (“AFC”) is a custom frame and art printing service located in Maumee, Ohio.

On August 1, 2020, AFC detected that it was the target of a cybersecurity attack. An unauthorized third party attempted to infiltrate AFC’s computer network, encrypt AFC’s data, and then demand a ransom payment in exchange for decryption. Although we have found no evidence that your information has been specifically accessed for misuse, it is possible that your full name, mailing address, and social security number could have been exposed to cybercriminals.

This information was maintained by AFC for two primary purposes, being employee payroll and benefits, as well as contractor/vendor tax purposes.

What We Are Doing:

Upon detecting this incident, we moved quickly to initiate our incident response, which included conducting an investigation with the assistance of third-party forensic specialists and confirming the security of our network environment. We have reviewed and altered our tools, policies, and procedures relating to the security of our systems and servers, as well as our information life cycle management.

We value the safety of your personal information and are therefore offering credit monitoring and identity theft protection services through ID Experts Corp. (“IDX”). IDX’s services include: At least 12 months of credit monitoring and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

Your work deserves an
American Frame®

What You Can Do:

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling 833-754-1801 or by going to <https://response.idx.us/frame> and using the Enrollment Code provided above. IDX is available Monday through Friday 9 am - 9 pm Eastern Time. Please note the deadline to enroll is April 14, 2021.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

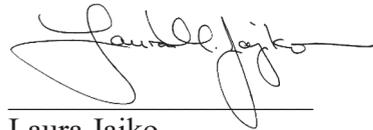
Enclosed hereto you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

For More Information:

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call IDX at the number provided above.

AFC values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Jajko', written over a horizontal line.

Laura Jajko
President

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze	Experian Security Freeze	TransUnion Security Freeze
P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and 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 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 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 violators. 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 at 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For New York residents, the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, 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 incident.



Picture Frames | Framing Supplies | Fine Art Printing

C/O IDX
PO Box 4129
Everett WA 98204

ENDORSE



NAME

ADDRESS1

ADDRESS2



SEQ
RCODE2D
Ver 1CC

CSZ

COUNTRY

BREAK

400 Tomahawk Dr.
Maumee, Ohio 43537-1654
AmericanFrame.com

To enroll, please call: 833-754-1801

Or visit: <https://response.idx.us/frame>

Enrollment code: <<XXXXXXXXXX>>

January 14, 2021

Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

We are writing in order to inform you of an incident that may have exposed your credit card information. We take the security of your personal information seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved:

American Frame Corporation (“AFC”) is a custom frame and art printing service located in Maumee, Ohio.

On August 1, 2020, AFC detected that it was the target of a cybersecurity attack. An unauthorized third party attempted to infiltrate AFC’s computer network, encrypt AFC’s data, and then demand a ransom payment in exchange for decryption. It is possible that your full name, mailing address, and credit card information could have been exposed to cybercriminals. The impacted credit card has the last four digits of: **VAR_DATA_1**.

This information was maintained by AFC for customer payment processing.

What We Are Doing:

Upon detecting this incident, we moved quickly to initiate our incident response, which included conducting an investigation with the assistance of third-party forensic specialists and confirming the security of our network environment. We have reviewed and altered our tools, policies, and procedures relating to the security of our systems and servers, as well as our information life cycle management.

We value the safety of your personal information and are therefore offering credit monitoring and identity theft protection services through ID Experts Corp. (“IDX”). IDX’s services include: At least 12 months of credit monitoring and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

Your work deserves an
American Frame.

What You Can Do:

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling 833-754-1801 or by going to <https://response.idx.us/frame> and using the Enrollment Code provided above. IDX is available Monday through Friday 9 am - 9 pm Eastern Time. Please note the deadline to enroll is April 14, 2021.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

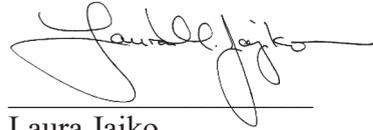
Enclosed hereto you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

For More Information:

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call IDX at the number provided above.

AFC values the security of your personal and financial data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Jajko', written over a horizontal line.

Laura Jajko
President

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze
---	---	--

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and 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 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 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 violators. 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 at 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For New York residents, the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, 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 incident.