



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

RECEIVED

AUG 12 2019

CONSUMER PROTECTION

Sian M. Schafle  
Office: (267) 930-4799  
Fax: (267) 930-4771  
Email: [sschafle@mullen.law](mailto:sschafle@mullen.law)

1275 Drummers Lane, Suite 302  
Wayne, PA 19087

August 7, 2019

**VIA U.S. MAIL**

Attorney General Gordon J. MacDonald  
Office of the New Hampshire Attorney General  
Consumer Protection Bureau  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Attorney General MacDonald:

We represent Anvil Accounting Services, LLC (“Anvil”), located at located at 1379 Dilworthtown Crossing, Suite 210, West Chester, PA 19382, and are writing to notify your office of an incident that may affect the security of some personal information relating to two (2) New Hampshire residents. 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, Anvil 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**

Anvil is an accounting and bookkeeping business that provides services to companies including PMDI Signs, Inc. located 10 Council Rock Drive, Ivyland, PA 18974.

In April of 2019, Anvil hired an employee who after one week abruptly resigned citing a personal family matter. Despite several attempts to reclaim the former employee’s Anvil-issued laptop, the laptop remained outstanding and the former employee failed to respond to any Anvil communications. Anvil-issued laptops are not used to store sensitive information and the former employee’s access to Anvil systems was terminated upon his resignation. Because Anvil takes the security of information in our care seriously, on May 17<sup>th</sup>, Anvil commenced an investigation into this matter. The investigation included working with a third-party forensic investigation firm to determine what specific data the former employee may have accessed during his brief employment. While Anvil cannot confirm whether specific information was viewed by the former

employee outside the scope of his employment, he did have access to systems containing personal information while employed at Anvil from April 1, 2019 through April 8, 2019. Therefore, in an abundance of caution, Anvil notified affected clients including PMDI Signs, Inc.

The information that could have been subject to unauthorized access varied by potentially affected client and individual. The type of personal information for individuals associated PMDI Signs, Inc. includes one or more of the following identifiers: name and Social Security number.

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

On July 29, 2019, Anvil provided written notice of this incident to affected individuals associated with PMDI Signs, Inc., which includes two (2) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

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

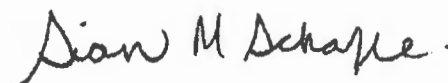
Upon discovering the event, Anvil moved quickly to investigate and respond to the incident, assess the security of Anvil systems, and notify potentially affected clients. Anvil is also working to implement additional safeguards and training to its employees. Anvil is providing access to identity monitoring services for two (2) years, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Anvil is providing impacted 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. Anvil is providing individuals with information on how to place a fraud alert and security 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. Anvil also reported this event to law enforcement.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4799.

Very truly yours,



Sian M. Schafle of  
MULLEN COUGHLIN LLC

# **EXHIBIT A**



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

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip>>

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

Anvil Accounting Services, LLC (“Anvil”) is an accounting and bookkeeping business that provides services to your or your family member’s employer, <<ClientDef1(Employer Name)>>. In the course of providing these services, we received certain information related to you. We are writing to notify you of an incident that may affect the security of some of your personal information. We take this incident very seriously. This letter provides details of the incident, 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?** In April of 2019, Anvil hired an employee, who after one week, abruptly resigned citing a personal family matter. Despite several attempts to reclaim the former employee’s Anvil-issued laptop, the laptop remained outstanding and the former employee failed to respond to any Anvil communications. Anvil-issued laptops are not used to store sensitive information and the former employee’s access to Anvil systems was terminated upon his resignation. Because we take the security of information in our care seriously, on May 17<sup>th</sup>, Anvil commenced an investigation into this matter. Our investigation included working with a third-party forensic investigation firm to determine what specific data the former employee may have accessed during his brief employment. While we cannot confirm if your information was specifically viewed by the former employee, he did have access to systems containing your information during his employment. Therefore, in an abundance of caution, we are providing you this notice.

**What Information Was Involved?** Anvil reviewed our systems and programs to determine what information was potentially accessible to the former employee. Our review confirmed that the information contained in these systems and programs includes your <<ClientDef2(Breach Details)>>.

**What We Are Doing?** Information privacy and security are among our highest priorities. Anvil has strict security measures in place to protect information in our care. Once Anvil exhausted attempts to communicate with the former employee and recover our laptop, we quickly took further steps to confirm the security of our systems and determine what information was potentially accessible. We also reported the incident to law enforcement and are working with a cybersecurity consultant to further enhance our security. In an abundance of caution, we are also notifying potentially affected individuals, including you, so that you may take further steps to best protect your information, should you feel it is appropriate to do so. We arranged to have Kroll provide identity monitoring services for 2 years at no cost to you as an added precaution.

**What Can You Do?** You may review the information contained in the attached “Steps You Can Take to Protect Your Information.” You may also activate the identity monitoring services we are making available to you. Anvil will cover the cost of this service. Because the activation process does not allow us to activate on your behalf, you will need to activate your services by following the instructions outlined in this letter.

**For More Information.** We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-866-775-4209 (toll free), Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time. Please have your membership number ready. You may also write to us at P.O. Box 703 Mendenhall, PA 19357.

We sincerely regret any inconvenience this incident may cause you. Anvil remains committed to safeguarding information in our care, and we continue to take proactive steps to enhance the security of our systems.

Sincerely,

*Maria A. Dunlevy*

Maria A. Dunlevy  
Managing Director  
Anvil Accounting Services, LLC

## Steps You Can Take to Protect Your Information

### **Activate Identity Monitoring**

While we are unaware of any actual or attempted misuse of your information, in an abundance of caution, we have secured the services of Kroll to provide identity monitoring services at no cost to you for 2 years. 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.

Visit **[krollbreach.idMonitoringService.com](http://krollbreach.idMonitoringService.com)** to activate and take advantage of your identity monitoring services.

You have until **October 27, 2019** to activate your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-844-263-8605. Additional information describing your services is included with this letter.

### **Monitor Your Accounts**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements and explanation of benefits, and to monitor your credit reports for suspicious activity and to detect error over the next 12 to 24 months. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. 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 contact the three major credit bureaus directly to request a free copy of your credit report.

You have the 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. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

|   |   |   |
|---|---|---|
| <b>Experian</b><br>PO Box 9554<br>Allen, TX 75013<br>1-888-397-3742<br><a href="http://www.experian.com/freeze/center.html">www.experian.com/freeze/center.html</a> | <b>TransUnion</b><br>P.O. Box 2000<br>Chester, PA 19016<br>1-888-909-8872<br><a href="http://www.transunion.com/credit-freeze">www.transunion.com/credit-freeze</a> | <b>Equifax</b><br>PO Box 105788<br>Atlanta, GA 30348-5788<br>1-800-685-1111<br><a href="http://www.equifax.com/personal/credit-report-services">www.equifax.com/personal/credit-report-services</a> |
|---|---|---|

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your 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 agencies listed below:

|   |   |  |
|---|---|--|
| <b>Experian</b><br>P.O. Box 2002<br>Allen, TX 75013<br>1-888-397-3742<br><a href="http://www.experian.com/fraud/center.html">www.experian.com/fraud/center.html</a> | <b>TransUnion</b><br>P.O. Box 2000<br>Chester, PA 19106<br>1-800-680-7289<br><a href="http://www.transunion.com/fraud-victim-resource/place-fraud-alert">www.transunion.com/fraud-victim-resource/place-fraud-alert</a> | <b>Equifax</b><br>P.O. Box 105069<br>Atlanta, GA 30348<br>1-888-766-0008<br><a href="http://www.equifax.com/personal/credit-report-services">www.equifax.com/personal/credit-report-services</a> |
|---|---|--|

## **Additional Information**

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](http://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 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, [www.ncdoj.gov](http://www.ncdoj.gov).

**For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, [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 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 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 Rhode Island Residents**, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, [www.riag.ri.gov](http://www.riag.ri.gov), 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 XX Rhode Island residents impacted by this incident.



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

You've been provided with access to the following services<sup>1</sup> 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 can help you determine if it's 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 can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. 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.