

March 29, 2024

**VIA EMAIL (DOJ-CPB@DOJ.NH.GOV)**

Attorney General John Formella  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

*Re: Incident Notification*

Dear Attorney General Formella:

We are writing on behalf of our client, Benefit Management Corp. (“Benefit Management”), to notify you of a data security incident involving New Hampshire residents.

On September 11, 2023, Benefit Management Corp. (“Benefit Management”) discovered that an unauthorized third party accessed its network environment. Benefit Management immediately took steps to secure its systems and initiated an investigation to determine the nature and scope of the incident. Benefit Management’s investigation determined that files containing personal information were accessed by the unauthorized third party. Benefit Management reviewed the contents of the files involved to determine what information may have been accessible to the unauthorized individual(s). Benefit Management began notifying affected individuals on November 14, 2023. On February 7, 2024, Benefit Management notified additional individuals based on additional forensic findings from its investigation.

On February 15, 2024, Benefit Management’s investigation identified additional files that included the \_\_\_\_\_ of 4 New Hampshire residents. On March 29, 2024, Benefit Management will begin mailing notification letters to the New Hampshire residents via First Class mail in accordance with N.H. Rev. Stat. Ann. § 359-C:20.<sup>1</sup> A copy of the notification letter is attached. Benefit Management is offering the New Hampshire residents \_\_\_\_\_ of credit monitoring, fraud consultation, and identity theft restoration services

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<sup>1</sup> This report does not waive Benefit Management Corps.’ objection that New Hampshire lacks personal jurisdiction over Benefit Management Corp related to this matter.

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through Kroll. Benefit Management has also established a dedicated, toll-free call center that individuals can call to obtain more information regarding the incident.

To help prevent something like this from happening again, Benefit Management has and will continue to take steps to enhance the security of computer systems and the data it maintains.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

M. Scott Koller  
Partner

Attachment



**BENEFIT MANAGEMENT**  
WEALTH STRATEGIES AND EMPLOYEE BENEFITS

<<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 (Variable Title CA Residents Only: "Notice of Data Breach")>>

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

We are writing to notify you that Benefit Management Corporation ("Benefit Management") experienced a security incident that may have involved some of your personal information. Benefit Management is not affiliated with Osaic Wealth, Inc. ("Osaic") but is registered with Osaic for the sale of securities products and provision of financial advice. This letter explains the incident, outlines the measures we have taken, and provides steps you can take in response.

### **What Happened?**

On September 11, 2023 we launched an investigation into suspicious activity originating from Benefit Management's network environment. As soon as we became aware of the activity, we took immediate steps to secure our systems and launched an investigation. The investigation determined that an unauthorized person gained access to our computer network and obtained certain files from our system between September 8, 2023 and September 11, 2023. Thankfully, your advisor has experienced no disruptions in servicing your account.

### **What Information Was Involved?**

Our investigation determined on February 15, 2024, that your information may have been accessed by an unauthorized individual, including your <<b2b\_text\_2 ("name" and data elements)>>.

### **What We Are Doing.**

Your confidence and trust are important to us, and we regret any inconvenience or concern this incident may cause. To further help protect your information, we have implemented additional measures to enhance our existing security protocols. Additionally, we have arranged to provide identity monitoring at no cost to you for through Kroll. The identity monitoring services we are making available to you include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. For more information on identity theft prevention and Kroll Identity Monitoring, including instructions on how to activate your complimentary membership, please visit the below website and see the additional information provided with this letter.

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

You have until <<b2b\_text\_6(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s\_n>>

For more information about Kroll and your Identity Monitoring services, you can visit [info.krollmonitoring.com](http://info.krollmonitoring.com).

### **What You Can Do.**

We encourage you to remain vigilant by reviewing your account statements and credit reports for any unauthorized activity over the next 12 to 24 months. If you see unauthorized charges or activity, please contact your financial institution immediately. For more information, including some additional steps you can take to help protect your information, please see the pages that follow this letter.

**Questions and/or Concerns.**

We regret this incident occurred and apologize for any inconvenience. If you have any questions, please call <<TFN>>, Monday through Friday, 8:00 a.m. to 5:30 p.m., Central Time, excluding major U.S. holidays.

Sincerely,

*Troy J. Shreve*

Troy J. Shreve  
President

Hal Gilbert  
Vice President of Privacy, Osaic Wealth, Inc.



## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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.

### 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.

## ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-888-378-4329
- *Experian*, PO Box 2002, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742
- *TransUnion*, PO Box 1000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com), 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.identitytheft.gov](http://www.identitytheft.gov)

### Fraud Alerts and Credit or Security Freezes:

**Fraud Alerts:** There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

**Credit or Security Freezes:** You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

*How do I place a freeze on my credit reports?* There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)
- **TransUnion Security Freeze**, PO Box 160, Woodlyn, PA 19094, [www.transunion.com](http://www.transunion.com)
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

*How do I lift a freeze?* A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Benefit Management Corporation's address is 3341 Pioneers Boulevard, Suite 1, Lincoln, NE 68506 and its phone number is 402-420-7776.

**Additional information for residents of the following states:**

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, [www.marylandattorneygeneral.gov/](http://www.marylandattorneygeneral.gov/)

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov)

**A Summary of Your Rights Under the Fair Credit Reporting Act:** The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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 reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You have a 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.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.



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