



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

August 9, 2023

**VIA E-MAIL**

Office of the New Hampshire Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301  
E-mail: [DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov)

**Re: Notice of Data Event**

To Whom It May Concern:

We represent Bluebird Network LLC (“Bluebird”) located at 10024 Office Center Ave. #201 Sappington, Missouri 63128, and write to notify your office of an event that may affect the security of certain information relating to approximately one (1) New Hampshire resident. This notice may be supplemented if significant new facts are learned subsequent to its submission. By providing this notice, Bluebird does not waive any rights or defenses regarding the applicability of New law, the applicability of the New data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On March 22, 2023, Bluebird identified suspicious activity in its computer network. Bluebird immediately launched an investigation into the nature and scope of the event with outside cybersecurity and digital forensics specialists. Bluebird also promptly reported the event to federal law enforcement. Through the investigation, Bluebird learned that an unknown individual accessed certain systems on its network between March 14, 2023 and March 22, 2023, and viewed or downloaded files on a limited number of systems.

Bluebird then conducted a comprehensive review of the potentially impacted data to determine what information was affected and to whom the information related with the assistance of a third-party vendor. Bluebird began providing notice to potentially affected individuals on a rolling basis as Bluebird determined which individuals were impacted. The first notices were mailed on May 11, 2023, while the data review was ongoing. The data review is now complete.

Please note that the New Hampshire resident was not known to be impacted until the completion of the data review on or around July 13, 2023.

[Mullen.law](http://Mullen.law)

The personal information that could have been subject to unauthorized access for the New Hampshire resident includes their

### **Notice to the New Hampshire Resident**

On May 11, 2023, Bluebird began providing notice of the event to employees, along with complimentary access to credit and identity monitoring services, while the investigation was ongoing. On August 9, 2023, Bluebird continued to provide written notice of this event to potentially affected individuals, including approximately one (1) New resident. 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 identifying the event, Bluebird moved quickly to investigate and respond to the event, assess the security of its systems, and identify potentially affected individuals. Further, Bluebird promptly reported the event to federal law enforcement and regulators. Bluebird is also working to implement additional safeguards and training to its employees. Bluebird provided access to credit monitoring services for through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, Bluebird is providing potentially affected individuals with guidance on how to better protect against identity theft and fraud. Bluebird 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.

Bluebird also provided written notice of this event to appropriate state and federal regulators.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data event, please contact us at

Very truly yours,

Samuel Sica, III of  
MULLEN COUGHLIN LLC

SZS/jls  
Enclosure

# **EXHIBIT A**



Return Mail Processing  
PO Box 999  
Suwanee, GA 30024

August 9, 2023

[Extra1]

Dear Sample A. Sample:

Bluebird Network LLC (“Bluebird”) is providing notice of an event that may affect the security of certain information related to you. We are providing you with information about the event, our response, and additional measures you can take to help protect your information, should you feel it appropriate to do so.

**What Happened?** On March 22, 2023, Bluebird identified suspicious activity in our computer network. We immediately launched an investigation into the nature and scope of the event with outside cybersecurity specialists. We also reported the event to federal law enforcement. Through the investigation, we learned that an unknown individual accessed certain systems on our network between March 14, 2023 and March 22, 2023, and viewed or downloaded files on a limited number of systems.

We then conducted a comprehensive review of the potentially impacted data to determine what information was affected and to whom the information related. Our review is now complete, and your information was identified within the potentially impacted data.

**What Information Was Involved?** Our investigation determined that the following types of information related to you were potentially impacted

**What We Are Doing.** We take this event and the security of information in our care seriously. Upon becoming aware of this event, we took steps to swiftly investigate and respond, assess the security of our systems, and notify potentially affected individuals. We are also reviewing and enhancing our technical safeguards, as well as our information security policies and procedures.

As an additional precaution, we are offering potentially impacted individuals with \_\_\_\_\_ of credit monitoring and identity theft services through Experian. Details of this offer and instructions on how to activate these services are enclosed in the *Steps You Can Take to Protect Personal Information*.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please also review the enclosed *Steps You Can Take to Protect Personal Information*, which contains information on what you can do to safeguard against possible misuse of your information. Please also enroll in the complimentary credit monitoring services as Bluebird cannot enroll on your behalf.

**For More Information** If you have additional questions, you may call our toll-free assistance line at \_\_\_\_\_ Monday through Friday from 9:00 am to 11:00 pm and Saturday through Sunday from 11:00 am to 8:00 pm Eastern (excluding U.S. holidays). You may also write to Bluebird at 10024 Office Center Ave. #201 Sappington, MO 63128.

Sincerely,

Michael Morey  
President and Chief Executive Officer  
Bluebird Network LLC

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### Enrollment Instructions

To help protect your identity, we are offering complimentary access to Experian IdentityWorks<sup>SM</sup> for

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for \_\_\_\_\_ from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at \_\_\_\_\_

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary \_\_\_\_\_ membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** \_\_\_\_\_ (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll:
- Provide your **activation code**:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at \_\_\_\_\_ by November 30, 2023. Be prepared to provide engagement number \_\_\_\_\_ as proof of eligibility for the Identity Restoration services by Experian.

### ADDITIONAL DETAILS REGARDING YOUR MEMBERSHIP

### EXPERIAN IDENTITYWORKS

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

## **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 a free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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> |
| 1-888-298-0045  | 1-888-397-3742  | 1-800-916-8800  |
| Equifax Fraud Alert, P.O. Box 105069<br>Atlanta, GA 30348-5069  | Experian Fraud Alert, P.O. Box<br>9554, Allen, TX 75013                     | TransUnion Fraud Alert, P.O. Box<br>2000, Chester, PA 19016                                 |
| Equifax Credit Freeze, P.O. Box 105788<br>Atlanta, GA 30348-5788  | Experian Credit Freeze, P.O.<br>Box 9554, Allen, TX 75013                   | TransUnion Credit Freeze, P.O.<br>Box 160, Woodlyn, PA 19094                                |

## **Additional Information**

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state attorney general. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. To file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant 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, D.C. 20001; 202-727-3400; and [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

*For New Mexico residents*, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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, individuals have the right to obtain any police report filed in regard to this event. Fees may be required to be paid to the consumer reporting agencies. There are approximately 0 Rhode Island residents that may be impacted by this event.