



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

APR 28 2022

CONSUMER PROTECTION

Kevin Dolan
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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

April 21, 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 BlueForce, Inc. (“BlueForce”) located at 109 E. 17th Street, Suite #5895, Cheyenne, Wyoming 82001, and are writing to notify your office of an incident that may affect the security of some personal information relating to five (5) 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, BlueForce 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 May 4, 2021, BlueForce experienced a disruption to certain computer systems following a sophisticated cyber-attack. BlueForce immediately launched an investigation, working with outside cybersecurity specialists to confirm the security of BlueForce’s system moving forward and the nature and scope of this event. In the early stages of this investigation, on or about July 26, 2021, BlueForce initially determined that certain information may have been subject to unauthorized access, and on August 17, 2021, BlueForce provided a first round of notice to this initial population of impacted individuals. BlueForce’s continuing investigation ultimately determined that certain files on BlueForce’s systems could have been subject to unauthorized access on May 4, 2022 but could not confirm which specific data was impacted. As a result, BlueForce then embarked on a diligent and comprehensive review of all data at risk to determine: the full universe of information present in the potentially impacted files; to whom the information related; and, accurate mailing addresses for all potentially impacted individuals. On March 8, 2022,

BlueForce completed this time intensive review and confirmed that additional information related to New Hampshire residents was potentially impacted by this event. The information that could have been subject to unauthorized access includes name, address, Social Security number, and financial account information.

Notice to New Hampshire Residents

On or about April 21, 2022, BlueForce provided written notice of this incident to affected individuals, which includes five (5) 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

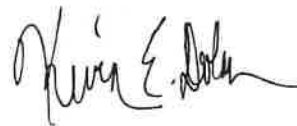
Upon discovering the event, BlueForce moved quickly to investigate and respond to the incident, assess the security of BlueForce systems, and notify potentially affected individuals. BlueForce is also working to implement additional safeguards and training to its employees. BlueForce is providing access to credit monitoring services for 1 year, through Experian to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, BlueForce 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. BlueForce 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4861.

Very truly yours,



Kevin Dolan of
MULLEN COUGHLIN LLC

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

April 20, 2022

H8044-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



NOTICE OF [Extra2]

Dear Sample A. Sample:

BlueForce, Inc. (“BlueForce”) writes to inform you of an incident that may affect the security of some of your personal information. This notice provides information about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

What Happened? On or about May 4, 2021, BlueForce experienced a disruption to certain computer systems following a sophisticated cyber-attack. BlueForce immediately launched an investigation, working with outside cybersecurity specialists to confirm the security of BlueForce’s system moving forward and the nature and scope of this event. This investigation determined that certain files on BlueForce’s systems could have been subject to unauthorized access on May 4, 2021 but could not confirm which specific data was impacted. As a result, BlueForce then embarked on a diligent and comprehensive review of all data at risk to determine: the full universe of information present in the potentially impacted files; to whom the information related; and accurate mailing addresses for all potentially impacted individuals. On March 8, 2022, BlueForce completed this time intensive review and confirmed that information related to you was potentially impacted by this event.

What Information Was Involved? The following types of your personal information may have been subject to unauthorized access as a result of this incident: name and [Extra1].

What We Are Doing. We take this incident and the security of personal information in our care seriously. Upon learning of this incident, we moved quickly to investigate and respond, to assess the security of relevant systems, and to reset relevant account passwords. As part of our ongoing commitment to the security of information, we are also reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event.

BlueForce notified law enforcement of this incident and will notify relevant state and federal regulators, as appropriate. We are also offering you access to complimentary credit monitoring and identity protection services for ## months through Experian. These services include fraud consultation and identity theft restoration services. If you wish to activate the credit monitoring and identity protection services, you may follow the instructions included in the *Steps You Can Take to Protect Personal Information*.

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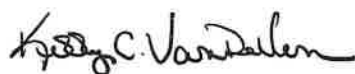


What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, and to review your account statements and credit reports for suspicious activity. You may also review the information contained in the attached *Steps You Can Take to Protect Personal Information*. There you will also find more information on the credit monitoring and identity protection services we are making available to you. While BlueForce will cover the cost of these services, you will need to complete the activation process.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our call center at (833) 468-0635 Monday through Friday from 9 a.m. to 11 p.m. Eastern, and Saturday and Sunday from 11 a.m. to 8 p.m. Eastern.

We sincerely regret any inconvenience or concern this incident may have caused.

Sincerely,



Kelley C. Van De Ven
Chief Financial Officer
BlueForce, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Restoration

To help protect your identity, we are offering a complimentary ##-month membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: July 31, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 468-0635 by **July 31, 2022**. Be prepared to provide engagement number **ENGAGE#** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR ##-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

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 agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (833) 468-0635. 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 (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).

* 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.



Please note that this Identity Restoration support is available to you for ## months 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 www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

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 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 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 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 security 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:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
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 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; 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. 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 and your 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, DC 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. BlueForce is located at: 109 E. 17th Street, Suite #5895, Cheyenne, Wyoming 82001.

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, 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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 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. There are 6 Rhode Island residents impacted by this incident.



NH DEPT OF JUSTICE
APR 28 2022 PM 1:12