



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

RECEIVED

JAN 21 2020

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302  
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January 15, 2020

**INTENDED FOR ADDRESSEE(S) ONLY**

**VIA U.S. MAIL**

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

**Re: Supplemental Notice of Data Security Incident**

Dear Sir or Madam:

We continue to represent Calibre CPA Group (“Calibre”), where one of its primary offices is located at 7501 Wisconsin Avenue, Suite 1200 West, Bethesda, Maryland 20814. We write to supplement our September 9, 2019 notice to your office of an incident that may affect the security of some personal information relating to certain New Hampshire residents. By providing this notice, Calibre 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.

Calibre’s investigation, as described in our prior notice, reviewing of the contents of the impacted source documents, the types of protected information contained in the documents, and to which individuals the information relates, continued following the initial notice. Calibre continued a lengthy review of its files to ascertain address information for the impacted individuals. This included continued work with a vendor to provide advanced address look-up services to ensure notice would be mailed to the person’s most recent address on record, as well as continued analysis of impacted source documents to obtain data points related to individuals for cross-reference in Calibre’s internal systems.

Based on the continued investigation and analysis, Calibre determined protected information relating to an additional sixty-three (63) New Hampshire residents was contained in the files accessible as a result of this incident for a total of sixty-six (66) impacted New Hampshire residents. Calibre provided written notice to these additional individuals in substantially the same form as the letter attached as *Exhibit A*.

Calibre is also providing access to identity and credit monitoring services for two (2) years, through Kroll, to individuals whose PII was potentially affected by this incident, at no cost to these individuals.

Additionally, Calibre 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. Calibre is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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. As a precautionary matter, Calibre notified law enforcement. Calibre also provided relevant regulatory notices.

#### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4775.

Very truly yours,



Christopher J. DiIenno of  
MULLEN COUGHLIN LLC

CJD:ajd  
Enclosure

# EXHIBIT A



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

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

## Notice of Data Breach

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

Calibre CPA Group ("Calibre") is a full-service accounting firm that has conducted audits related to pension plans and other retirement plans for <<b2b\_text\_2>>. We are writing to notify you of a recent incident that may affect the security of some of your personal information. We are providing you with information on the event and measures we have taken since discovering the incident.

**What Happened?** Calibre recently became aware of suspicious activity related to certain employee email accounts, as well as one of our computer servers. We immediately launched an investigation to determine the full nature and scope of the email activity and what information may have been affected. With the assistance of computer forensics experts, we learned that one of our computer servers as well as certain Calibre employee email accounts were accessed without authorization between March 11, 2019 and May 7, 2019.

Working with these third-party experts, we undertook a comprehensive review of the impacted email accounts and impacted server to determine if they contained personal information and received confirmation of the scope of potentially impacted individuals on June 26, 2019. However, based on the information contained within the affected data, we still lacked complete address information related to individuals and were unable to adequately identify any potential business partners from whom the information originated. Calibre subsequently undertook a lengthy internal review of our systems to determine this information, and later determined that information related to you was accessible during the period of potential compromise.

We are notifying you in an abundance of caution because your information was present and potentially accessible at the time of the incident. Calibre functions as a full-service accounting and advisory firm, offering audit, advisory, and general accounting services.

**What Information Was Involved?** Calibre cannot confirm specifically what information, if any, was viewed by the unauthorized individual. However, Calibre's investigation confirmed the information present at the time of the incident may include your <<b2b\_text\_1>>.

**What We Are Doing.** Information privacy and security are among our highest priorities. Calibre has strict security measures in place to protect information in our care. Upon learning of this incident, Calibre took steps to confirm and further strengthen the security of our systems. As a precautionary matter, Calibre also notified law enforcement and provided relevant regulatory notices.

We are notifying potentially affected individuals, including you, so that you may take further steps to better protect your personal information should you feel it is appropriate to do so. We also secured the services of Kroll to provide identity monitoring services at no cost to you for two (2) years. For more information on these services, please review the enclosed "Steps You Can Take to Protect Against Identity Theft and Fraud."

**What You Can Do.** You may review the information contained in the enclosed "Steps You Can Take to Protect Against Identity Theft and Fraud." You may also activate to receive the identity monitoring services we are making available to you as we are unable to activate these services on your behalf.

**For More Information.** We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, we established a dedicated assistance line at 1-833-496-0188 which can be reached Monday through Friday from 9:00 a.m. to 6:30 p.m. Eastern Time. You may also write to us at ATTN: Cyber Security, Calibre CPA Group, PLLC, PO Box 30380, Bethesda, Maryland 20824.

Calibre takes the privacy and security of the personal information in our care very seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

*Calibre CPA Group, PLLC*

### Steps You Can Take to Protect Against Identity Theft and Fraud

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for two 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. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

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

You have until **March 9, 2020** to activate your identity monitoring services.

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. 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:

**Experian**

PO Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

**TransUnion**

P.O. Box 2000  
Chester, PA 19016  
1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

**Equifax**

PO Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

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

Although we have no reason to believe that your personal information has been used to file fraudulent tax returns, you can contact the IRS at [www.irs.gov/Individuals/Identity-Protection](http://www.irs.gov/Individuals/Identity-Protection) for helpful information and guidance on steps you can take to address a fraudulent tax return filed in your name and what to do if you become the victim of such fraud. You can also visit [www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft](http://www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft) for more 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 and your state Attorney General. This notice has not been delayed by law enforcement.

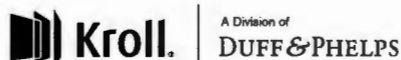
**For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, [www.ncdoj.gov](http://www.ncdoj.gov). You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

**For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, [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 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 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 Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <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](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 XXX 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 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.