

BakerHostetler

RECEIVED

SEP 21 2017

CONSUMER PROTECTION

Baker&Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111

T 212.589.4200
F 212.589.4201
www.bakerlaw.com

Gerald J. Ferguson
direct dial: 212.589.4238
gferguson@bakerlaw.com

September 20, 2017

VIA OVERNIGHT MAIL

Attorney General Joseph Foster
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Foster:

We are writing on behalf of our client, Rudy Cecchi and Associates, Inc. (“Rudy Cecchi”), a member firm of Valmark Financial Group, to notify you of a security incident involving New Hampshire residents.

On July 31, 2017, Rudy Cecchi learned that an unauthorized person gained access to company email accounts beginning on July 28, 2017. Rudy Cecchi immediately secured the email accounts and began an investigation. After conducting a thorough review of the compromised email accounts, Rudy Cecchi determined that they contained the names, addresses, Social Security numbers, driver’s license numbers, and in some instances, health insurance and medical information.

On September 20, 2017, Rudy Cecchi began sending written notifications to one potentially affected New Hampshire resident via U.S. mail in substantially the same form as the letter attached hereto. In addition, Rudy Cecchi is offering a complimentary one-year membership in credit monitoring and identity theft protection services from Experian to the affected New Hampshire residents. A copy of the notice is attached.¹ Notice is being provided in the most expeditious time possible and without unreasonable delay in accordance with N.H. Rev. Stat. Ann. § 359-C:20.

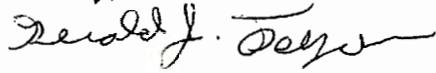
¹ This report is not a waiver of personal jurisdiction.

Attorney General Joseph Foster
September 20, 2017
Page 2

To help prevent something like this from happening in the future, Rudy Cecchi has further enhanced the security of its systems.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Gerald J. Ferguson".

Gerald J. Ferguson
Partner

Enclosure



September 20, 2017

Mail ID
Sample Customer
123 Sample Street
City, State XXXXX
United States

Dear Sample Customer:

At Rudy Cecchi and Associates, Inc. and ValMark Financial Group, we value our customers and understand the importance of protecting personal information. We are writing to inform you that we recently identified and addressed a matter that may have involved your information. This notice explains the incident, measures we have taken, and some steps you can take in response.

On July 31, 2017, we learned that an unauthorized person gained access to email accounts beginning on July 28, 2017. We immediately secured the email accounts and began an investigation. We conducted a thorough review of the email accounts and determined that it contained your first and last name, address, Social Security number, driver's license number, and health insurance and/or medical information.

Even though we have found no evidence that your personal information was viewed or misused in anyway, we wanted to let you know this occurred and to assure you we take it very seriously. As a precaution, we are offering you a complimentary one-year membership of Experian's® IdentityWorksSM. This product provides you with identity detection and resolution of identity theft. Please refer to the following page for more information on IdentityWorksSM, including instructions on how to activate your complimentary one-year membership. We encourage you to remain vigilant about watching for possible fraud and identity theft. Identity Restoration assistance is immediately available to you.

We deeply regret any inconvenience this may cause. To help prevent something like this from happening in the future, we have further enhanced the security of our systems. If you have questions, please contact us at 305-854-0200 from Monday through Friday between 9 a.m. – 5 p.m. EST.

Sincerely,

Rudy Cecchi
President
Rudy Cecchi & Associates, Inc.

[Signature]

Mark White
Senior Vice President of Shared Services
ValMark Financial Group

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

Activate IdentityWorks Now in Three Easy Steps

1. ENROLL by: **12/31/17** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: www.experianidworks.com/3bcreditone
3. PROVIDE the **Activation Code**: **[Code]**

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 877-890-9332. Be prepared to provide engagement number **DB03356** as proof of eligibility for the identity restoration services by Experian.

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues and, 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, Equifax and Transunion files 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™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcreditone>
or call 877-890-9332 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-890-9332.

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

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

MORE INFORMATION ON WAYS TO PROTECT YOURSELF

We recommend that you remain vigilant for incidents of fraud or identity theft by reviewing your account statements and credit reports for any unauthorized activity. 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 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, 1-800-685-1111
Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
TransUnion, PO Box 2000, Chester, PA 19016, 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.ftc.gov/idtheft



September 20, 2017

Mail ID
Sample Customer
123 Sample Street
City, State XXXXX
United States

Dear Sample Customer:

At Rudy Cecchi and Associates, Inc. and ValMark Financial Group, we value our customers and understand the importance of protecting personal information. We are writing to inform you that we recently identified and addressed a matter that may have involved your information. This notice explains the incident, measures we have taken, and some steps you can take in response.

On July 31, 2017, we learned that an unauthorized person gained access to email accounts beginning on July 28, 2017. We immediately secured the email accounts and began an investigation. We conducted a thorough review of the email accounts and determined that it contained your first and last name, address, Social Security number, and driver's license number.

Even though we have found no evidence that your personal information was viewed or misused in anyway, we wanted to let you know this occurred and to assure you we take it very seriously. As a precaution, we are offering you a complimentary one-year membership of Experian's® IdentityWorksSM. This product provides you with identity detection and resolution of identity theft. Please refer to the following page for more information on IdentityWorksSM, including instructions on how to activate your complimentary one-year membership. We encourage you to remain vigilant about watching for possible fraud and identity theft. Identity Restoration assistance is immediately available to you.

We deeply regret any inconvenience this may cause. To help prevent something like this from happening in the future, we have further enhanced the security of our systems. If you have questions, please contact us at 305-854-0200 from Monday through Friday between 9 a.m. – 5 p.m. EST.

Sincerely,

Rudy Cecchi
President
Rudy Cecchi & Associates, Inc.

[Signature]

Mark White
Senior Vice President of Shared Services
ValMark Financial Group

Activate IdentityWorks Now in Three Easy Steps

1. ENROLL by: **12/31/17** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: www.experianidworks.com/3bcreditone
3. PROVIDE the **Activation Code**: **[Code]**

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 877-890-9332. Be prepared to provide engagement number **DB03356** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-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, 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, Equifax and Transunion files 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™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcreditone>
or call 877-890-9332 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-890-9332.

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

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

MORE INFORMATION ON WAYS TO PROTECT YOURSELF

We recommend that you remain vigilant for incidents of fraud or identity theft by reviewing your account statements and credit reports for any unauthorized activity. 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 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, 1-800-685-1111
Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
TransUnion, PO Box 2000, Chester, PA 19016, 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.ftc.gov/idtheft