CLARKSVILLE
MONTGOMERY COUNTY
SCHOOL SYSTEM

Dr. B. J. Worthington
Director of Schools

Board of Education
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August 8, 2012

Attorney General Michael A. Delaney
Office of the Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Clarksville-Montgomery County School System

Dear Attorney General Delaney:

We are writing to inform you of a data security event that compromised the security of personal information. Clarksville-Montgomery County School System ("CMCSS"), 621 Gracey Avenue, Clarksville, Tennessee 37040, is informing your office of pertinent facts that are known at this time related to an illegal intrusion into nine CMCSS computer databases that contained the names, addresses, and Social Security numbers of certain current and former CMCSS employees, as well as the names, addresses, Social Security numbers, dates of birth, and student identification numbers of certain current and former CMCSS students. Upon discovery of the unauthorized access, CMCSS retained breach notification legal counsel Nelson, Levine, de Luca & Hamilton, LLC, as well as forensic computer analysts Kivu Consulting, Inc., to assist with its investigation of, and response to, this incident. CMCSS also notified local and state law enforcement of the data security event. The investigation is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CMCSS does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Security Event

CMCSS discovered on June 11, 2012 that an unknown individual illegally accessed, *via* a SQL injection attack, nine databases on CMCSS's computer network that contained the names, addresses, and Social Security numbers of certain current and former CMCSS employees, as well as the names, addresses, Social Security numbers, dates of birth and student identification numbers of certain current and former CMCSS students. On this date, CMCSS also discovered that this information had been posted on the website www.pastebin.com. CMCSS immediately disconnected its network from the internet, and internally disconnected the Central Office from the thirty-eight schools within the system. CMCSS immediately notified local law enforcement of the event. CMCSS also notified the Tennessee Bureau of Investigation, which is working in conjunction with the FBI to investigate the event.

Notice to New Hampshire Residents

Although the investigation is ongoing, it appears that one (1) New Hampshire resident's personal information was accessed without authorization. This New Hampshire resident received written notice of the data security event on or about August 2, 2012 in substantially the same form as the sample notice attached to this letter as ***Exhibit A***.

Other Steps Taken and To Be Taken

As discussed above, CMCSS retained computer forensic experts and legal counsel specializing in data breach response. CMCSS is providing notice of this data security event to other state regulators. The local and federal law enforcement investigations are ongoing.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact our data privacy counsel, James E. Prendergast or Jennifer A. Coughlin, of the law firm Nelson, Levine, de Luca & Hamilton, at 215-358-5087.

Sincerely,

Dr. B. J. Worthington
Director of Schools
Clarksville-Montgomery County School System

Exhibit A

CLARKSVILLE
MONTGOMERY COUNTY
SCHOOL SYSTEM

C/O ID Experts
PO Box 6336
Portland, OR 97228-6336

<<mail id>>
<<Name>>
<<Address1>>
<<Address2>>
<<City>><<State>><<Zip>>

<<Date>>

Dear <<Name>>,

Clarksville-Montgomery County School System ("CMCSS") discovered on June 11, 2012 that an unknown individual gained access to certain CMCSS databases and unlawfully accessed some of its private information. CMCSS's ongoing investigation indicates that your name and Social Security number were accessed during this intrusion. We are providing this notice to you to ensure you are aware of this incident and so that you may take steps to monitor your credit and protect your identity should you feel it is necessary to do so.

CMCSS takes this matter very seriously. Your safety and security as a member of this community is our highest priority. CMCSS has reported this matter to local and federal authorities, has retained computer forensic experts, and has retained legal experts to assist with the ongoing investigation. CMCSS is also taking a series of steps to ensure that this does not happen again.

We have retained the firm ID Experts® to assist you with any questions related to this security incident. We encourage you to be in touch with these experts, who can answer questions or concerns you may have regarding this incident and the protection of your personal information. They are available Monday through Friday from 8 a.m.-8 p.m. Central Time by calling 1-888-266-9276.

CMCSS will provide you with FraudStop™ Credit Edition credit monitoring and identity recovery services to help protect your identity, should you determine that such services are appropriate. With this protection—which is at no cost to you for one year—ID Experts will help you resolve issues if your identity is compromised. We encourage you to register for this free identity protection service by calling 1-888-266-9276 or going to the informational website at www.ExpertsProtection.com. Please note the deadline to enroll is October 3, 2012.

You will find detailed instructions for enrollment on the enclosed Recommended Steps document. You will need to reference the following membership code. Please have this letter with you when calling. You may also register for these monitoring services, access membership benefits, find answers to frequently asked questions, and report suspected identity theft by logging on to www.ExpertsProtection.com.

Your Membership Code: [ID Experts will insert individual codes]

Your free one-year membership will include the following:

- **Fraud Resolution Representatives:** ID Experts will provide assistance if you suspect that your personal information is being misused. A recovery advocate will be assigned to your case, and they will work with you to assess, stop, and reverse any fraudulent activity. If you suspect or discover suspicious activity, you should contact them immediately for assistance.

- **Credit Monitoring:** ID Experts will provide 12 months of credit monitoring that will notify you by email of key changes in your credit file. Detailed instructions for activating your credit monitoring are provided on the ID Experts member website which you may log into once you enroll.

- **Exclusive Educational Materials:** The ID Experts website includes a wealth of useful information, including instructive articles, a Protection Test that you can take, very helpful ID Self-Defense Academy™ information and a place where you can review and update your account. Their experts will keep you up-to-date on new identity theft scams, tips for protection, legislative updates and other topics associated with maintaining the health of your identity.

- **Insurance Reimbursement:** ID Experts will arrange $20,000 of identity theft reimbursements for certain expenses that can be incurred when resolving an identity theft situation.

To protect against possible identity theft or other financial loss, we encourage you to remain vigilant, to review your account statement, and to monitor your credit reports. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit bureaus. To order your free credit report, visit www.annualcreditreport.com or call toll-free 1-877-322-8228.

The names and contact information of the three major U.S. credit bureaus are listed below. At no charge, you can have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. This service can make it more difficult for someone to get credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax Security Freeze	Experian Security Freeze	TransUnion Security Freeze
P.O. Box 105788	P.O. Box 9554	P.O. Box 6790
Atlanta, GA 30348	Allen, TX 75013	Fullerton, CA 92834
www.equifax.com	www.experian.com	www.transunion.com

To further educate yourself regarding identity theft and the steps you can take to avoid identity theft, you may contact the Federal Trade Commission. They can be reached at:

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
www.ftc.gov/bcp/edu/microsites/idtheft/
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. Your state Attorney General may also have advice on preventing identity theft, and you should report instances of known or suspected identity theft to law enforcement, your State Attorney General, and the FTC. **For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001; telephone (919) 716-6400, www.ncdoj.gov. **For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; telephone (888) 743-0023, www.oag.state.md.us.

Again, please be assured that your safety and security is very important to us. We regret any inconvenience or concern that this matter may have caused you. If you have any questions, please contact the experts at the call center dedicated to this matter Monday through Friday from 8 a.m.-8 p.m. Central Time by calling 1-888-266-9276.

Very truly yours,

BJ Worthington

Dr. BJ Worthington
Director of Schools
Clarksville-Montgomery County School System