



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

RECEIVED  
MAR 15 2021  
CONSUMER PROTECTION

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

March 11, 2021

**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 Cleveland Integrity Systems, Inc. ("CIS") located at 370690 Old Highway 64; Cleveland, OK 74020, and are writing to notify your office of an incident that may affect the security of some personal information relating to approximately two (2) New Hampshire residents. The investigation into this matter is ongoing, and this notice may be supplemented with new significant facts learned subsequent to its submission. By providing this notice, CIS 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 January 20, 2021, CIS learned that it was the target of a cyberattack and that portions of its computer network were infected with malware. CIS immediately took systems offline and launched an investigation into the nature and scope of the incident. CIS learned that the cybercriminals gained access to their network on or before December 28, 2020. On January 25, 2021, CIS received confirmation that certain files stored within its environment containing information for current and former employees had been removed from the system. Although CIS is continuing to investigate this incident, they are moving to notify potentially affected individuals already identified.

The information that was potentially impacted for current and former employees of CIS includes name, address, Social Security number, date of birth, Passport number, driver's license number, financial account number, account type, financial institution name, and routing number.

**Notice to New Hampshire Residents**

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On or about March 11, 2021, CIS began providing written notice of this incident to all the impacted current and former employees, which includes approximately two (2) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Based upon its review, CIS determined that dependents and spouses for certain impacted employees may also have name and Social Security number impacted. For this reason, the notice letters to those employees communicated the risk as to any dependent or spouse and also provided an offer of free credit monitoring services to dependents and spouses.

#### **Other Steps Taken and To Be Taken**

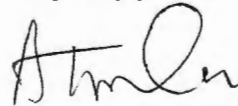
Upon discovering the event, CIS moved quickly to investigate and respond to the incident, assess the security of CIS systems, and notify potentially affected individuals. CIS is also working to implement additional safeguards and training to its employees. CIS is providing access to credit monitoring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

Additionally, CIS 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. CIS are 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) 930-4801.

Very truly yours,



Alexander T. Walker of  
MULLEN COUGHLIN LLC

ATW/msf

# EXHIBIT A

**CLEVELAND INTEGRITY SERVICES, INC.**

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

March 11, 2021



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SAMPLE A. SAMPLE - L02

APT ABC

123 ANY ST

ANYTOWN, ST 12345-6789



Dear Sample A. Sample:

At Cleveland Integrity Services, Inc. (“CIS”) we understand that the confidentiality of your information is very important, and we are committed to protecting it. We are writing to make you aware of an incident that may affect the security of some of your information. This letter provides details of the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

**What Happened.** On January 20, 2021, CIS learned that it was the target of a cyberattack and that portions of our computer network were infected with malware. We immediately took systems offline and launched an investigation into the nature and scope of the incident. We have learned that the cybercriminals gained access to our network on or before December 28, 2020. Our investigation into exactly what sensitive information was viewed or removed from CIS systems without authorization is ongoing. Unfortunately, on January 25, 2021, we received confirmation that certain files stored within CIS’s environment that contain personal information were removed from the system. Although we are continuing to investigate this incident, we wanted to provide you with this notice at the earliest opportunity.

**What Information Was Involved.** At this stage in our investigation, we believe the stolen files may include your name, Social Security number, direct deposit routing/account numbers, driver’s license or passport number, date of birth and last known address.

If you registered for benefits with CIS between 2011 and 2018, and also provided the name and Social Security number of your spouse, former spouse and/or dependent(s), it is possible that they were also impacted by this incident. You, your spouse, former spouse and/or dependent(s) may all use the following adult and minor codes to enroll in credit monitoring services.

**What We Are Doing.** Information security is among CIS’s highest priorities, and CIS has strict security measures in place to protect information in our care. Upon discovering this incident, we immediately took steps to review and reinforce the security of our systems. We are reviewing existing security policies and have implemented additional cybersecurity measures to further protect against similar incidents moving forward. We reported this incident to law enforcement and are cooperating with their investigation. We are notifying potentially impacted individuals, including you, so that you may take steps to protect your information.

As an added precaution, we are offering you access to credit monitoring and identity theft protection services for twelve (12) months at no cost to you and if applicable, your spouse, former spouse and/or dependents. You will find information on how to enroll in these services in the enclosed “Steps You Can Take to Help Protect Your Information.” We encourage you (and, as applicable, your spouse/former spouse/dependent(s)) to enroll in these services as we are not able to do so on your behalf.

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***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 information contained in the enclosed “*Steps You Can Take to Help Protect Your Information.*” Please share this information with your spouse, former spouse and dependents to the extent this notice applies to them.

***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 dedicated assistance line at (833) 549-2143 between the hours of 8:00 a.m. to 10:00 p.m. CST Monday through Friday and 10:00 a.m. to 7:00 p.m. CST Saturday/Sunday. If applicable, your spouse, former spouse and/or dependent(s) can also call the dedicated assistance line. We take this incident very seriously and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Cleveland Integrity Services, Inc.  
(enclosure)

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

### Enroll in Credit Monitoring

#### FOR ADULT INDIVIDUALS OVER THE AGE OF EIGHTEEN (18):

To help protect your identity, we are offering a complimentary one-year membership of Experian's® IdentityWorks<sup>SM</sup>. 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: May 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [www.experianidworks.com/credit](http://www.experianidworks.com/credit)
- Provide your **activation code:** [REDACTED]

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) 549-2143 by **May 31, 2021**. Be prepared to provide engagement number [REDACTED] 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 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.

#### FOR MINOR INDIVIDUALS UNDER THE AGE OF EIGHTEEN (18):

Additionally, to help protect your minor's identity, we are offering a complimentary one-year membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides superior identity detection and resolution of identity theft. To activate this membership and start monitoring your minor's personal information please follow the steps below:

- Ensure that you **enroll by: May 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [www.experianidworks.com](http://www.experianidworks.com) [REDACTED]
- Provide your **activation code:** [REDACTED]
- Provide your minor's information when prompted

If you have questions about the product, need assistance with identity restoration for your minor or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 549-2143 by **May 31, 2021**. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

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

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You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks for your minor:

- **Social Security Number Trace:** Monitoring to determine whether enrolled minors in your household have an Experian credit report. Alerts of all names, aliases and addresses that become associated with your minor's Social Security Number (SSN) on the Experian credit report.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** Receive the same high-level of Identity Restoration support even after the Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance\*\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

### **Monitor 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](http://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, military identification, 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 fraud alert or credit freeze, 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>
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 your 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](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. 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 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](http://www.oag.state.md.us). [DATA\_ELEMENTS] is located at 123 ANY ST.

*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, you have the right to obtain any police report filed in regard to this incident. There is 1 Rhode Island resident impacted by this incident.





*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](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/>.

\* 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.

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