



Sean B. Hoar
888 SW Fifth Avenue, Suite 900
Portland, Oregon 97204-2025
Sean.Hoar@lewisbrisbois.com
Direct: 971.712.2795

September 20, 2017

File No. 50131.508

VIA E-MAIL

Consumer Protection and Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
E-Mail: DOJ-CPB@doj.nh.gov

Re: Notification of Data Security Incident

Dear Attorney General MacDonald:

I represent CliftonLarsonAllen LLP ("CLA"), an accounting firm with offices in a number of states. This letter is being sent pursuant to N.H. Rev. Stat. §§359-C:19-21, because on August 28, 2017, CLA discovered that a third-party service provider's client portal system had been compromised via a user's login credentials, permitting unauthorized access to personal information of four (4) New Hampshire residents. The information consisted of tax and wage data, names, addresses, dates of birth, Social Security numbers, and financial account numbers. The data security incident did not occur on, nor did it affect, CLA's systems.

CLA immediately prevented any further access to the affected user account credentials, and worked with the third-party service provider to enhance the security of the client portal system. CLA also promptly contacted the Internal Revenue Service/Criminal Investigation unit upon learning of the data security incident in order to prevent fraudulent activity. CLA engaged in forensic investigation both internally and with the assistance of an independent firm.

CLA is in the process of notifying affected New Hampshire residents via the attached letter. CLA is also providing 12 months of complimentary identity and credit monitoring services to affected residents through Kroll. Please feel free to contact me with any questions.

Very truly yours,

A handwritten signature in blue ink that reads 'Sean B. Hoar'.

Sean B. Hoar of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Consumer Notification Letter



<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Date>> (Format: Month Day, Year)
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<ZipCode>>

Subject: Notice of Data Breach

Dear <<MemberFirstName>> <<MemberLastName>>,

I am writing to inform you of a data security incident that may have involved your personal information. At CliftonLarsonAllen LLP (“CLA”), we take the privacy and security of your information very seriously. This is why I am contacting you, offering you credit and identity monitoring services, and informing you about steps that can be taken to protect your personal information.

What Happened? On August 28, 2017, CLA discovered a third-party service provider’s client portal system had been compromised via a user’s login credentials, permitting unauthorized access to certain client information. Upon learning that this had occurred, we immediately began an investigation to determine what happened, and contacted the Internal Revenue Service Criminal Investigations Division (“IRS/CI”) about the matter to prevent fraudulent activity. We wanted to inform you of the incident, offer you credit monitoring services, and encourage you to utilize the information below to protect your personal information.

What Information Was Involved? The following information may have been obtained by unauthorized individual(s): tax and wage information, names, addresses, dates of birth, Social Security numbers and bank account numbers. Receiving this letter does not mean that you are a victim of identity theft. However, compromised information has been used to file unauthorized tax returns on behalf of affected individuals in a small number of cases, which is why we have contacted the IRS/CI to identify your tax identification information for careful review and higher scrutiny in the event of any such activity.

What Are We Doing? CLA took the steps referenced above in response to the data security incident. Additionally, we prevented any further access to the affected user account credentials, and worked with the third-party service provider to enhance the security of the client portal system. We are working with the IRS/CI to prevent fraudulent returns from being accepted or refunds issued, and to hold the perpetrators accountable. We are offering you credit and identity monitoring services for 12 months at no cost to you and providing you additional information about steps you can take to protect your personal information.

What You Can Do: You can follow the recommendations on the following page to protect your personal information. You can also contact Kroll, the credit and identity remediation services vendor that we have retained, with any questions and enroll in the free credit monitoring and identity monitoring services we are offering for 12 months at no cost to you by going to my.idmonitoringservice.com and using the membership number, <<Member ID>>. If you have questions or need an alternative to enrolling online, please call 1-833-202-7410 and provide your membership number. You must enroll in the services by December 28, 2017. 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. Your services start on the date that you enroll in the services and can be used at any time thereafter for 12 months.

Additional information describing your services is included with this letter.

For More Information: Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, call 1-833-202-7410, 8:00 a.m. to 5:00 p.m. (Central Time), Monday through Friday. Please have your membership number ready.

We are grateful for your business and your trust. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Dahl". The signature is fluid and cursive, with a large initial "H" and a long, sweeping underline.

Harold (Hod) Dahl, CPA
Chief Quality Officer
CliftonLarsonAllen LLP

STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity

As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

TransUnion	Experian	Equifax	Free Annual Report
P.O. Box 1000 Chester, PA 19016 1-877-322-8228 www.transunion.com	P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	P.O. Box 105851 Atlanta, GA 30348 1-800-525-6285 www.equifax.com	P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 annualcreditreport.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: In some US states, you have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. If you request a security freeze from a consumer reporting agency there may be a fee up to \$10 to place, lift or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, Federal Trade Commission or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the Federal Trade Commission or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov , and www.ftc.gov/idtheft 1-877-438-4338	Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 oag.state.md.us 1-888-743-0023	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226
---	---	---

Rhode Island Attorney General
150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
401-274-4400

You also have certain rights under the Fair Credit Reporting Act (FCRA), including: to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information, as well as others. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ 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.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

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.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. 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.