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

RECEIVED

JUL 16 2021

CONSUMER PROTECTION

Matthew V. Toldero  
Office: (267) 930-4554  
Fax: (267) 930-4771  
Email: mtoldero@mullen.law

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

July 12, 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 Clover Park School District (“CPSD”), located at 10903 Gravelly Lake Drive SW, Lakewood, WA 98499, and are writing to notify your office of an incident that may affect the security of some personal information relating to approximately one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CPSD 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 May 17, 2021, CPSD aware of suspicious activity impacting its computer systems. CPSD immediately commenced an investigation to confirm the nature and scope of the incident. The investigation determined that an unknown actor took and may have viewed certain information during a period of unauthorized access to our computer systems between May 12, 2021 and May 26, 2021. After conducting a thorough review of the potentially impacted computer systems, CPSD determined on or around June 22, 2021 that personal information pertaining to some individuals may have been included in the potentially impacted computer systems. The information that could have been subject to unauthorized access includes name, address, and Social Security number.

### **Notice to New Hampshire Resident**

On or about July 12, 2021, CPSD provided written notice of this incident to all affected individuals, which includes approximately one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

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

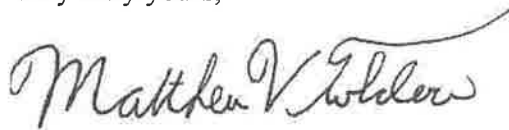
Upon discovering the event, CPSD moved quickly to investigate and respond to the incident, assess the security of CPSD systems, and notify potentially affected individuals. CPSD is also working to implement additional safeguards and training to its employees. CPSD is providing access to credit monitoring services for 12 months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, CPSD 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. CPSD is 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) 930-4554.

Very truly yours,

A handwritten signature in black ink that reads "Matthew V. Toldero". The signature is written in a cursive style with a long, sweeping underline.

Matthew V. Toldero of  
MULLEN COUGHLIN LLC

# **EXHIBIT A**

Clover Park School District  
Return to IDX  
10300 SW Greenburg Rd., Suite 570  
Portland, OR 97223



To Enroll, Please Call:  
1-800-939-4170  
Or Visit:  
<https://app.idx.us/account-creation/protect>  
Enrollment Code: <<XXXXXXXXXX>>

<<Name 1>> <<Name 2>>  
<<Address 1>> <<Address 2>>  
<<City>>, <<State>> <<Zip>>

July 12, 2021

**NOTICE OF <<SECURITY INCIDENT>> / <<DATA BREACH>>**

Dear <<Name 1>> <<Name 2>>:

Clover Park School District (“CPSD”) is writing to notify you of a recent incident that may impact the security of some of your information. While we are unaware of any actual misuse of your information, we are providing you with notice of the incident, steps we are taking in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

**What Happened?** CPSD recently became aware of suspicious activity impacting our computer systems. We immediately commenced an investigation to confirm the nature and scope of the incident. The investigation determined that an unknown actor took and may have viewed certain information during a period of unauthorized access to our computer systems between May 12, 2021 and May 26, 2021. After conducting a thorough review of the potentially impacted computer systems, we determined on or around June 22, 2021 that some of your information may have been included in the potentially impacted computer systems.

**What Information Was Involved?** The information present in the files that were impacted by the incident may have included your name, address, and Social Security number.

**What We Are Doing.** CPSD treats its responsibility to safeguard information in our possession as an utmost priority. As such, we responded immediately to this event and have been working diligently to provide you with an accurate and complete notice of the incident as soon as possible. In response to this event, we are cooperating with an investigation launched by federal law enforcement. As part of our ongoing commitment to the privacy and security of personal information in our care, we are reviewing our existing policies and procedures relating to data protection and security. We are also investigating additional security measures to mitigate any risk associated with this incident and to better prevent future incidents. We are providing notice of this event to potentially impacted individuals and to state regulators, where required.

Out of an abundance of caution, we are providing you with complimentary access to identity theft protection services through IDX, as well as guidance on how to better protect your information, should you feel it is appropriate to do so. While we are covering the cost of these services, you will need to complete the activation process yourself. The services include <<12/24>> months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services.

**What You Can Do.** You can find out more about how to safeguard your information in the enclosed *Steps You Can Take to Protect Personal Information*. 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. We

also encourage you to enroll in the complementary credit monitoring and identity restoration services. Enrollment instructions are enclosed with this letter.

**For More Information.** If you have additional questions, please contact our dedicated assistance line at 1-800-939-4170, Monday through Friday, 6:00 a.m. to 6:00 p.m. PT. You may also write to CPSD at 10903 Gravelly Lake Drive SW, Lakewood, WA 98499.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Banner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ron Banner  
Superintendent

<https://cpsd.cloverpark.k12.wa.us/>

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### Enroll in Identity Protection Services

- 1. Website and Enrollment.** Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
- 2. Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.
- 3. Telephone.** Contact IDX at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

### Monitor Your 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, 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 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<br>Atlanta, GA 30348-5069  | Experian Fraud Alert, P.O. Box<br>9554, Allen, TX 75013                     | TransUnion Fraud Alert, P.O. Box<br>2000, Chester, PA 19016                                 |
| Equifax Credit Freeze, P.O. Box 105788<br>Atlanta, GA 30348-5788  | Experian Credit Freeze, P.O.<br>Box 9554, Allen, TX 75013                   | TransUnion Credit Freeze, P.O.<br>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 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/>.

*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.