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COUGHLIN<sub>LLC</sub>  
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RECEIVED

APR 14 2021

CONSUMER PROTECTION

Sian M. Schafle  
Office: (267) 930-4799  
Fax: (267) 930-4771  
Email: [sschafle@mullen.law](mailto:sschafle@mullen.law)

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

April 1, 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 Community Access Unlimited (“CAU”) located at 80 W Grand St Elizabeth, NJ 07202, and are writing to notify your office of an incident that may affect the security of some personal information relating to a 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, CAU 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 November 10, 2020, CAU discovered unusual activity involving certain internal CAU systems. CAU immediately disconnected the systems from the network and commenced an investigation that included working with third-party forensic specialists. On November 20, 2020, the investigation determined that the involved systems were subject to unauthorized access by someone not connected with CAU sometime between June 29, 2020 and November 12, 2020. Because we could not conclusively rule out access to data within these systems, CAU conducted a review of the potentially impacted data to determine the type of information and to whom it related, which concluded on March 9, 2021. The personal information as defined by N.H. Rev. Stat. Ann. § 359-C:19(IV)(a) that could have been subject to unauthorized access includes name, address, Social Security number, driver’s license, and state or federal identification number.

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

On April 1, 2021, CAU provided written notice of this incident to approximately one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*. While the investigation was ongoing, CAU posted notice of this incident on its website on or around January 8, 2021. The website notice was updated on March 26, 2021, and will be updated in the future to reflect any new significant facts learned regarding this event.

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

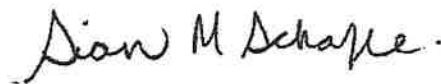
CAU moved quickly to investigate and respond to the incident, assess the security of CAU systems, and notify potentially affected individuals and business partners. CAU is also working to implement additional safeguards and training to its employees. CAU is providing access to credit monitoring services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

Additionally, CAU is providing 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. CAU 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. CAU also notified law enforcement.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4799.

Very truly yours,



Sian M. Schafle of  
MULLEN COUGHLIN LLC

SMS/mep

# **EXHIBIT A**



Return Mail Processing Center  
P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>>  
<<Address 5>>  
<<City>><<State>><<Zip>>  
<<Country>>

<<Date>>

<<Variable Data 2 – Header>>

Dear <<Name 1>>,

Community Access Unlimited (“CAU”) writes to tell you about an incident that may impact some of your information. This notice provides you with information about the incident, our response, and steps you may take to better protect your information, should you feel it is appropriate to do so.

**What Happened?** On November 10, 2020, CAU discovered unusual activity involving certain internal CAU systems. CAU immediately disconnected the systems from the network and commenced an investigation that included working with third-party forensic specialists. On November 20, 2020, the investigation determined that the involved systems were subject to unauthorized access by someone not connected with CAU sometime between June 29, 2020 and November 12, 2020. Because we could not conclusively rule out access to data within these systems, CAU conducted a review of the potentially impacted data to determine the type of information and to whom it related, which concluded on March 9, 2021.

**What Information Was Involved?** The involved CAU systems contained your name and the following types of information relating to you: <<breached elements>>. CAU’s Self-Direct Services Fiscal Management System “SDS” was not affected by this incident.

**What We Are Doing.** Upon learning of this incident, CAU moved quickly to investigate this event and confirm whether and what information may be affected. CAU is reviewing and enhancing its existing policies and procedures to reduce the likelihood of a similar future event. CAU is notifying potentially affected individuals and relevant state and federal regulators, as required. As an added precaution, CAU is offering complimentary access to credit monitoring and identity restoration services to potentially impacted individuals.

**What You Can Do.** CAU encourages you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and explanation of benefits and monitoring your free credit reports for suspicious activity. You may also review and consider the information and resources outlined in the below “Steps You Can Take to Protect Personal Information.” Importantly, to date, we do not have any evidence that your information was misused as a result of this incident.

**For More Information.** If you have additional questions, please call our dedicated assistance line at 855-435-0527 (toll free), Monday through Friday, from 9:00am – 9:00pm Eastern Time (excluding U.S. holidays). You may write to CAU at 80 W Grand St. Elizabeth, NJ 07202 or email [Privacy@caunj.org](mailto:Privacy@caunj.org) with any additional questions.

Sincerely,

Bernadette Griswold  
Executive Director  
[www.caunj.org](http://www.caunj.org)

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION



Enter your Activation Code: <<INSERT ACTIVATION CODE>>

### Product Information

**Equifax® Credit Watch™ Gold provides you with the following key features:**

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications<sup>1</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>2</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>3</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>4</sup>

### Enrollment Instructions

Go to [www.equifax.com/activate](http://www.equifax.com/activate).

Enter your unique Activation Code provided at the top of this page then click “Submit” and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click “Continue”.

*If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.*

*Once you have successfully signed in, you will skip to the Checkout Page in Step 4.*

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click ‘Sign Me Up’ to finish enrolling.

**You’re done!**

The confirmation page shows your completed enrollment.

Click “View My Product” to access the product features.

<sup>1</sup> WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers’ personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers’ personal information is at risk of being traded.

<sup>2</sup> The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

<sup>3</sup> Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer’s identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit [www.optoutprescreen.com](http://www.optoutprescreen.com).

<sup>4</sup> The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Equifax® is a registered trademark of Equifax Inc. ©2017 Equifax Inc., Atlanta, Georgia. All rights reserved.

To sign up for US Mail delivery, dial 1-855-833-9162 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.

1. **Activation Code:** You will be asked to enter your enrollment code as provided at the top of this letter.
2. **Customer Information:** You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.
3. **Permissible Purpose:** You will be asked to provide Equifax with your permission to access your Equifax credit file and to monitor your file. Without your agreement, Equifax cannot process your enrollment.
4. **Order Confirmation:** Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity can not be verified using the information provided). Please allow up to 10 business days to receive this information.

**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 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**

If you had a username and password involved in this incident, we recommend that you change the password and any security question or answer for that account immediately. If you reuse usernames and passwords for other online accounts, it is recommended that you change the password and any security question or answer for those online accounts, as well. Further, as a general precaution, you should never use the same password for more than one online account. When creating passwords, they should be complex and not contain personal 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). CAU is located at 80 W. Grand St. Elizabeth, NJ 07202.

*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 are four (4) Rhode Island residents impacted by this incident.

*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/>.