



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

RECEIVED

MAY 27 2022

CONSUMER PROTECTION

Richard Aponte-Boyd  
Office: (267) 930-4888  
Fax: (267) 930-4771  
Email: raponte@mullen.law

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

May 23, 2022

**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 Comstar, LLC (“Comstar”) located at 8 Turcotte Memorial Drive Rowley, MA 01969, and write to notify your office of an incident that may affect the security of certain personal information relating to eighteen thousand six hundred and ninety-two (18692) New Hampshire residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission and as the investigation identifies additional New Hampshire residents affected. By providing this notice, Comstar 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 or about March 26, 2022, Comstar discovered suspicious activity related to certain servers within its environment. Comstar immediately took steps to secure our network, and launched a thorough investigation, with the assistance of third-party experts, to determine the nature and scope of the incident. Through the investigation, Comstar determined that certain files on our network were subject to unauthorized access.

The information that could have been subject to unauthorized access includes name, date of birth, medical assessment and medication administration, health insurance information, driver’s license, financial account information, and Social Security number.

**Notice to New Hampshire Residents**

On or about May 23, 2022, Comstar began providing written notice of this incident, including to eighteen thousand six hundred and ninety-two (18692) New Hampshire residents. Written notice

Office of the Attorney General  
May 23, 2022  
Page 2

is being provided in substantially the same form as the letter attached here as *Exhibit A*. Comstar also posted notice of this incident on its website and issued a press release. A copy of Comstar's website notice is attached here as *Exhibit B* and a copy of the media notice is attached here as *Exhibit C*. Notification to impacted clients and individuals is ongoing.

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

Upon discovering the event, Comstar moved quickly to investigate and respond to the incident, assess the security of Comstar systems, and identify potentially affected individuals. Further, Comstar notified federal law enforcement regarding the event. Comstar is also working to implement additional safeguards and training to its employees. Comstar is providing access to credit monitoring services for at least twelve (12) months, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Comstar 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. Comstar 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.

Comstar is providing written notice of this incident to relevant state regulators, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion. Comstar is also notifying the U.S. Department of Health and Human Services.

#### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4888.

Very truly yours,

Richard Aponte-Boyd of  
MULLEN COUGHLIN LLC

RAB/mep  
Enclosure

# **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>>

## RE: Notice of Data Breach

Dear <<Name 1>>:

Comstar, LLC ("Comstar") writes to inform you of a recently discovered data security event that potentially impacted the security of some of your personal information. To date and after thorough investigation, we have no evidence that your data was subject to unauthorized access. However, since the possibility exists, we are writing out of an abundance of caution to provide this notice and inform you of steps you may take to help protect your personal information, should you feel it is appropriate to do so.

**What Happened?** On or about March 26, 2022, Comstar discovered suspicious activity related to certain servers within its environment. We immediately took steps to secure our network, and launched a thorough investigation, with the assistance of third-party experts, to determine the nature and scope of the incident. On April 21, 2022, the investigation determined that certain systems on our network were subject to unauthorized access. However, the investigation was unable to confirm what specific information on those systems was accessed. As such, we reviewed the contents of those systems to determine what information was contained therein and to whom it related. In an abundance of caution, we are notifying you because your personal information may have been contained on the potentially impacted systems.

**What Information was Involved?** The information that may have been impacted by this incident includes your name, date of birth, driver's license number, Social Security number and financial account information.

**What We Are Doing.** The security of information in Comstar's care is one of our highest priorities and we have strict security measures in place to protect information in our care. Upon becoming aware of this incident, we immediately took steps to confirm the security of our systems. While we had policies and procedures in place at the time of incident regarding security of information, we are reviewing those policies and procedures to further protect against similar incidents moving forward. We are notifying potentially impacted individuals, including you, so that you may take steps to help protect your information, should you feel it is appropriate to do so. Comstar notified law enforcement and is cooperating with the investigation. We are also reporting to state regulatory officials, as required.

Although we are unable to confirm if your information was impacted, as an added precaution, we are offering you access to <<CM Length>> of credit monitoring and identity theft restoration services through Equifax at no cost. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Information* for additional information on these services.

***What You Can Do.*** You can review the enclosed *Steps You Can Take to Help Protect Your Information*, which contains information on what you can do to better protect against the possibility of identity theft and fraud should you feel it is appropriate to do so. You may also enroll to receive the free credit monitoring and identity theft protection services we are offering.

***For More Information.*** We sincerely regret any inconvenience or concern this may have caused you. We understand you may have questions that are not answered in this letter. To ensure your questions are answered in a timely manner, you can call our dedicated assistance line at 877-587-4280, Monday through Friday, 9:00 a.m. to 9:00 p.m. Eastern Time.

Sincerely,

Comstar, LLC

## Steps You Can Take to Help Protect Your Information

### Enroll in Credit Monitoring



Enter your Activation Code: <<ACTIVATION CODE>>  
Enrollment Deadline: <<Enrollment Deadline>>

### Equifax Credit Watch™ Gold

\*Note: You must be over age 18 with a credit file to take advantage of the product

### 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 of <<ACTIVATION CODE>> 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

## **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 credit 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>
1-888-298-0045	1-888-397-3742	1-833-395-6938
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 California residents:* Visit the California Office of Privacy Protection ([www.oag.ca.gov/privacy](http://www.oag.ca.gov/privacy)) for additional information on protection against identity theft.

*For Kentucky residents:* Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, [www.ag.ky.gov](http://www.ag.ky.gov), Telephone: 1-502-696-5300.

*For District of Columbia residents:* the District of Columbia Attorney General may be contacted at: 400 6<sup>th</sup> Street, NW, Washington, D.C. 20001; 202-727-3400; and [oag@dc.gov](mailto:oag@dc.gov).

*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). Comstar LLC is located at 8 Turcotte Memorial Drive, Rowley, MA 01969-1706.

*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 Oregon residents:* Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://www.doj.state.or.us/), Telephone: 877-877-9392.

*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 [#] Rhode Island residents impacted by this incident.

*For Washington D.C. residents:* the Office of Attorney General for the District of Columbia can be reached at: 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001; 1-202-442-9828; <https://oag.dc.gov>.

*For All U.S. residents:* Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), 1-877-IDTHEFT (438-4338).