

**Christine Czuprynski**  
Direct Dial: 248-220-1360  
E-mail: cczuprynski@mcdonaldhopkins.com

June 17, 2020

**VIA U.S. MAIL**

Attorney General Gordon MacDonald  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

RECEIVED  
JUN 22 2020  
CONSUMER PROTECTION

**Re: Concorde Investment Services, LLC – Incident Notification**

Dear Attorney General MacDonald:

McDonald Hopkins PLC represents Concorde Investment Services, LLC and its affiliates Concorde Asset Management, LLC and Concorde Insurance Agency, Inc. (collectively “Concorde”). I am writing to provide notification of an incident at Concorde that may affect the security of personal information of approximately forty-five (45) New Hampshire residents. Concorde’s investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Concorde does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Concorde recently learned that a limited number of employee email accounts may have been compromised by an email phishing attack resulting in unauthorized access to these email boxes. Upon learning of the issue, Concorde immediately secured the accounts and commenced a prompt and thorough investigation. As part of its investigation, Concorde has been working very closely with external cybersecurity professionals experienced in handling these types of incidents. After an extensive forensic investigation and manual email review, Concorde discovered on May 14, 2020 that the impacted email accounts that were accessed between September 17, 2019 and November 4, 2019 contained a limited amount of personal information. The information included the affected residents’ full names and one (1) or more of the following: Social Security numbers, driver’s license numbers or state identification numbers, financial account information, credit or debit card information, dates of birth, passport numbers, medical information, and/or usernames and passwords associated with one (1) or more online accounts. Not all of the affected residents had their Social Security numbers impacted by this incident.

To date, Concorde has no evidence that any of the information has been misused. Nevertheless, out of an abundance of caution, Concorde wanted to inform you (and the affected residents) of the incident and to explain the steps that it is taking to help safeguard the affected residents against identity fraud. Concorde is providing the affected residents with written

Attorney General Gordon MacDonald  
Office of the Attorney General  
June 17, 2020  
Page 2

notification of this incident commencing on or about June 12, 2020 in substantially the same form as the letter attached hereto. Concorde is offering the affected residents whose Social Security numbers were impacted complimentary one-year memberships with a credit monitoring service. Concorde is advising the affected residents about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. The affected residents whose financial account information and/or, credit or debit card information was impacted are being advised to contact their financial institutions to inquire about steps to take to protect their accounts. The affected residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission. The affected residents whose medical information was impacted are also being provided steps to take to safeguard themselves against medical identity theft. The affected residents whose usernames and passwords were impacted are being advised to change their account passwords for the affected accounts and take other steps appropriate to protect all other online accounts for which they use the same usernames and passwords.

At Concorde, protecting the privacy of personal information is a top priority. Concorde is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Concorde continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions concerning this notification, please contact me at (248) 220-1360 or [cczuprynski@mcdonaldhopkins.com](mailto:cczuprynski@mcdonaldhopkins.com). Thank you for your cooperation.

Very truly yours,



Christine Czuprynski

Encl.



Dear [REDACTED]

We are writing with important information regarding a recent security incident. The privacy and security of the personal information we maintain is of the utmost importance to Concorde Investment Services, LLC and our affiliates Concorde Asset Management, LLC and Concorde Insurance Agency, Inc. (collectively "Concorde"). As such, we wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to help protect your information.

What Happened?

We recently learned that a limited number of employee email accounts may have been compromised by an email phishing attack resulting in unauthorized access to these email boxes.

What We Are Doing.

Upon learning of the issue, we immediately secured the accounts and commenced a prompt and thorough investigation. As part of our investigation, we have been working very closely with external cybersecurity professionals experienced in handling these types of incidents. After an extensive forensic investigation and manual email review, we discovered on May 14, 2020 that the impacted email accounts that were accessed between September 17, 2019 and November 4, 2019 contained some of your personal information. We have no evidence that any of the information has been misused. Nevertheless, out of an abundance of caution, we want to make you aware of the incident.

What Information Was Involved?

The impacted email account(s) that were accessed contained some of your personal information, including your [REDACTED]

What You Can Do.

To help protect you from potential misuse of your information, we are offering a complimentary one-year membership of Experian IdentityWorks<sup>SM</sup> Credit 3B. This product aids in detecting possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

This letter also provides other precautionary measures you can take to help protect your personal information, including placing a fraud alert and/or security freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your account statements for fraudulent or irregular activity on a regular basis.

For More Information.

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

**If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED].** This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to help protect against misuse of your information. The response line is available Monday through Friday, 8:00 am to 5:30 pm Central Time.

Sincerely,

Concorde Investment Services, LLC  
Concorde Asset Management, LLC  
Concorde Insurance Agency, Inc.

**– OTHER IMPORTANT INFORMATION –**

**1. Enrolling in Complimentary 12-Month Credit Monitoring.**

**Activate IdentityWorks Credit 3B Now in Three Easy Steps**

1. ENROLL by: [REDACTED] (Your code will not work after this date.)
2. VISIT the Experian IdentityWorks website to enroll: [REDACTED]
3. PROVIDE the 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 [REDACTED]. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

**ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:**

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **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, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at [REDACTED]  
or call [REDACTED] to register with the activation code above.**

**What you can do to protect your information:** There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [REDACTED] for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at [REDACTED].

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

**2. Placing a Fraud Alert on Your Credit File.**

Whether or not you choose to use the complimentary 12-month credit monitoring services, we recommend that you place an initial 1-year "fraud alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

**Equifax**  
P.O. Box 105069  
Atlanta, GA 30348  
www.equifax.com  
1-800-525-6285

**Experian**  
P.O. Box 2002  
Allen, TX 75013  
www.experian.com  
1-888-397-3742

**TransUnion LLC**  
P.O. Box 2000  
Chester, PA 19016  
www.transunion.com  
1-800-680-7289

### **3. Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "security freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by sending a request in writing or by mail, to all three nationwide credit reporting companies. To find out more about how to place a security freeze, you can use the following contact information:

#### **Equifax Security Freeze**

P.O. Box 105788  
Atlanta, GA 30348  
<https://www.freeze.equifax.com>  
1-800-685-1111

#### **Experian Security Freeze**

P.O. Box 9554  
Allen, TX 75013  
<http://experian.com/freeze>  
1-888-397-3742

#### **TransUnion LLC**

P.O. Box 2000  
Chester, PA 19016  
[www.transunion.com](http://www.transunion.com)  
1-800-680-7289

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit monitoring company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the City in which you currently reside.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

### **4. Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **[www.annualcreditreport.com](http://www.annualcreditreport.com)**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

### **5. Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If this notice letter states that your financial account information and/or credit or debit card information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect your account, including whether you should close your account or obtain a new account number.

**New York Residents:** You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; <https://ag.ny.gov/consumer-frauds-bureau/identity-theft>; Telephone: 800-771-775 (TDD/TYY Support: 800-788-9898); Medicare Fraud Control Unit Direct Line: 212-417-5397.