

# NORTON ROSE FULBRIGHT

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RECEIVED

JUN 05 2017

CONSUMER PROTECTION

June 1, 2017

**By Certified Mail  
Return Receipt Requested**

Office of the New Hampshire Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301

**Re: Legal Notice of Information Security Incident**

Dear Sirs or Madams:

I write on behalf of my client, Crimson Trace Corporation ("CTC"), an Oregon-incorporated entity, to provide notice regarding a data security incident that may have affected the personal information of approximately 35 New Hampshire residents. CTC is notifying affected residents to outline some steps that they may take to help protect themselves and provide them with an offer of free credit monitoring services.

On May 3, 2017, CTC discovered a potential security incident involving its e-commerce website, [www.crimsontrace.com](http://www.crimsontrace.com). An extensive forensic investigation determined that an unauthorized individual was able to gain access to portions of the website and install malicious software designed to capture payment card information as well as some basic contact information of customers who transacted on the site between June 1, 2016 and May 5, 2017.

CTC took steps to address this incident promptly after it was discovered. CTC engaged outside forensic experts to assist in investigating and addressing the incident and has reported the incident to the FBI. CTC removed the identified malicious software and also replaced and reconfigured various components of the website servers to further enhance the security of its systems. While CTC continues to review and enhance its security measures, it believes that the incident has now been contained.

Impacted New Hampshire residents will be notified via a written letter to be mailed on or around June 2, 2017. A form copy of the notice is enclosed. CTC is offering one year of complimentary credit monitoring and identity protection services to all affected customers, along with additional information about how to protect themselves from fraud and identity theft.

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Office of the New Hampshire Attorney General  
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If you have any questions or need further information regarding this incident, please contact me at (303) 801-2732 or [david.navetta@nortonrosefulbright.com](mailto:david.navetta@nortonrosefulbright.com).

Very truly yours,

A handwritten signature in black ink, appearing to read "David Navetta", with a stylized flourish at the end.

David Navetta

DJN/laro  
Enclosure



ENHANCING PEOPLE'S ABILITY TO PROTECT FAMILY, HOME AND COUNTRY.

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<ZipCode>>

<<Date>> (Format: Month Day, Year)

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

Crimson Trace recently became aware of a data security incident that may have affected certain customers who made a purchase on [www.crimsontrace.com](http://www.crimsontrace.com) between June 1, 2016 and May 5, 2017. We are providing this notice to inform you about the incident and to call your attention to precautionary steps you can take. We take your privacy very seriously and sincerely regret any concern this matter may cause you.

### What Information Was Involved?

The customer information potentially affected by this incident includes name, billing address, email address, telephone number, payment card account number, payment card type, expiration date, and CVV code. We understand you may be concerned about this incident, but we would like to emphasize that we have no evidence that information about the specific products you purchased has been exposed.

### What We Are Doing

We take the privacy and security of our customers' personal information very seriously and deeply regret that this incident occurred. We took immediate steps to address and contain this incident once it was discovered, including engaging outside forensic experts to assist us in investigating and containing the situation. We have also enhanced the security of our systems to prevent further incidents. While we continue to evaluate our security measures, we believe the incident has now been contained.

### What You Can Do

- **Review Card Statements:** You should review credit and debit card account statements as soon as possible and remain vigilant in order to identify any discrepancies or unusual activity. If you see any transactions that you do not recognize, immediately notify the issuer of the credit or debit card. *In instances of payment card fraud, please note that cardholders are typically not responsible for any fraudulent activity that is reported in a timely fashion.*
- **Enrollment in Complimentary Identity Protection Services:** To help address concerns you may have following this incident, we have secured the services of global risk mitigation and response leaders, Kroll, to provide identity monitoring at no cost to you for one year. To enroll, please follow these steps:
  - Visit <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.
  - You have until <<Date>> to activate your identity monitoring services.
  - Please provide the following membership Number: <<Member ID>>
  - To receive credit services by mail instead of online, please call 1-???-???-?????. Additional information describing the Kroll services is included in the attachment to this letter.
- **Information About Identity Theft Protection Guide:** Please review the "Information About Identity Theft Protection" reference guide, enclosed here, which describes additional steps you may take to help protect yourself.

**For More Information**

If you have additional questions or concerns about this incident you may contact us at 1-???-???-???? between 9:00 a.m. and 6:00 p.m. Eastern time, Monday through Friday. Again, we sincerely regret any concern this event may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Hoke". The signature is fluid and cursive, with the first name "Nate" and last name "Hoke" clearly distinguishable.

Nate Hoke  
Director, Customer Service

## Information About Identity Theft Protection

**Credit Monitoring:** You've been provided with access to the following services 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.
- **Public Persona** – Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you'll receive an alert.
- **Quick Cash Scan** – Quick Cash Scan monitors short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.
- **\$1 Million Identity Fraud Loss Reimbursement** – Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.
- **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.

**Review of Accounts and Credit Reports:** As a precaution you may regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed at the end of this guide.

Remain vigilant with respect to reviewing your account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to the relevant institutions, the credit bureaus, the proper law enforcement authorities, including local law enforcement, your state's attorney general, and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding and protection against identity theft: Federal Trade Commission, Consumer Response Center 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft). There may be similar resources available at the state level, and you may contact your state department of revenue directly for more information.

**Fraud Alerts:** There are also two types of fraud alerts that you can place on your credit report to put creditors on notice that you may be a victim of fraud: an initial alert and an extended alert. You may request an initial fraud alert if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may request an extended fraud alert if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies at the addresses or toll-free numbers listed below.

**Credit Freezes:** Massachusetts law allows consumers to place a security freeze on their credit reports. A security freeze prohibits the credit reporting agency from releasing any information from your credit report without written authorization. The credit reporting company may charge a reasonable fee of up to \$5 to place a freeze or lift or remove a freeze, unless you are a victim of identity theft or the spouse of a victim of identity theft, and have submitted a valid police report relating to the identity theft to the credit reporting company. (By law, you have the right to obtain any police report filed in regard to this incident, and if you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.) However, please be aware that placing a security freeze on your credit report may delay, interfere with or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

You may request that a freeze be placed on your credit report by sending a request to each of the three major consumer reporting agencies by certified mail, overnight mail or regular stamped mail to the addresses listed below. The following information should be included when requesting a security freeze (documentation for you and your spouse must be submitted when freezing a spouse's credit report): full name, with middle initial and any suffixes; Social Security number, date of birth (month, day and year); current address and previous addresses for the past five (5) years; and applicable fee (if any) or incident report or complaint with a law enforcement agency or the Department of Motor Vehicles if you have been the victim of identity theft. The request must also include a copy of a government-issued identification card, such as a driver's license, state or military ID card, and a copy of a utility bill, bank or insurance statement to provide proof of current address. Each copy should be legible, display your name and current mailing address, and the date of issue (statement dates must be recent).

The credit reporting agencies will have three (3) business days to place a security freeze on your credit report after receiving your request, then must send to you written confirmation and your unique personal identification number (PIN) or password within five (5) business days. To temporarily lift your security freeze to allow access to your credit report, you must call or send a written request to the credit reporting agencies by mail with your name, address, Social Security number, the PIN or password provided to you, and either the identities of the individuals or entities who you would like to access your credit report, or the time frame for which you would like the credit report to be available. To remove the security freeze, you must send a written request by mail to each of the credit reporting agencies and include your name, address, Social Security number, and PIN or password provided to you. The credit reporting agencies must comply within three (3) business days.

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed below.

#### **National Credit Reporting Agencies**

##### **Equifax ([www.equifax.com](http://www.equifax.com))**

P.O. Box 740241  
Atlanta, GA 30374  
800-685-1111

##### **Fraud Alerts:**

[https://www.alerts.equifax.com/AutoFraud\\_Online/jsp/fraudAlert.jsp](https://www.alerts.equifax.com/AutoFraud_Online/jsp/fraudAlert.jsp)

##### **Credit Freezes:**

<https://www.freeze.equifax.com>

##### **Experian ([www.experian.com](http://www.experian.com))**

P.O. Box 2002  
Allen, TX 75013  
888-397-3742

##### **Fraud Alerts:**

<https://www.experian.com/fraud/center.html>

##### **Credit Freezes:**

[https://www.experian.com/consumer/security\\_freeze.html](https://www.experian.com/consumer/security_freeze.html)

##### **TransUnion ([www.transunion.com](http://www.transunion.com))**

P.O. Box 1000  
Chester, PA 19016  
800-888-4213

##### **Fraud Alerts:**

<http://www.transunion.com/personal-credit/credit-disputes/fraud-alerts.page>

##### **Credit Freezes:**

<http://www.transunion.com/personal-credit/credit-disputes/credit-freezes.page>