



March 9, 2023

Via Electronic Mail: [DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov)

**Attorney General John M. Formella**  
New Hampshire Office of the Attorney General  
Consumer Protection Bureau  
33 Capitol Street  
Concord, NH 03301

**Re: Client : Curtis & Croft, LLC**  
**Matter : Data Security Incident**

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Dear Attorney General Formella:

We represent Curtis & Croft, LLC (“Curtis & Croft”) with respect to a potential data security incident described in more detail below. Curtis & Croft takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of New Hampshire residents that were potentially affected, what information has been compromised, and the steps that Curtis & Croft is taking to secure the integrity of its systems. We have also enclosed hereto samples of the notifications made to the potentially impacted individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

Curtis & Croft is a law firm in Sumter, South Carolina that focuses much of its practice on real estate closings. Their contact information is as follows: 325 W Calhoun Street, Sumter, SC 29150; 803-778-7404.

On September 2, 2022, Curtis & Croft discovered its employee’s business email account had experienced business email compromise when of its clients communicated that they had already sent funds for an upcoming real estate closing via wire transfer, despite Curtis & Croft not previously sending wire transfer instructions. Upon detection, Curtis & Croft immediately took

steps to secure its email environment and engaged third-party forensic specialists to perform a forensic investigation and determine the extent of the compromise.

The forensic investigation concluded on October 25, 2022. The forensic investigation could not rule out a complete download of the compromised email account. Extensive data mining efforts were required to identify any potentially compromised personal data. Data mining was completed on February 17, 2023. The data elements vary among the impacted individuals and not all individuals had the same data elements impacted, but the following information was potentially compromised: first name, last name, Social Security Number, and Driver's License Number. Impacted individuals were notified March 9, 2023.

As of this writing, we have no evidence and have not received any reports of related identity theft since the discovery of the incident.

## 2. New Hampshire Residents Notified

A total of two (2) New Hampshire residents were potentially affected by this business email compromise. Individual notification letters were mailed to all impacted individuals on March 9, 2023, by first class mail. A sample copy of the notification letter is included with this letter.

## 3. Steps Taken

Although Curtis & Croft is not aware of any evidence of misuse of personal information, Curtis & Croft has extended to all potentially impacted individuals an offer for free credit monitoring and identity theft protection through CyberScout. This service will include 12 months of credit monitoring, along with a fully managed identity theft recovery service, should the need arise. Curtis & Croft has changed passwords, strengthened password requirements, and implemented multi-factor authentication. Curtis & Croft is also conducting appropriate employee retraining to ensure this incident does not occur again.

## 4. Contact Information

Curtis & Croft remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at

Very truly yours,

**Lewis Brisbois Bisgaard & Smith LLP**

**Robert Walker, Esq.**

cc: Lewis Brisbois LLP  
Attn: Erica J. Lloyd, Esq.

Enclosures: *Sample Notification Letter*

Curtis & Croft, LLC  
c/o Cyberscout, a TransUnion Company  
1 Keystone Ave., Unit 700  
Cherry Hill, NJ 08003

**CURTIS & CROFT, LLC**  
ATTORNEYS AT LAW

325 W. CALHOUN STREET • P.O. BOX 3220  
SUMTER, SC 29151

**Via First-Class Mail**



March 9, 2023

Notice of Data Security Incident

Dear [REDACTED],

Curtis & Croft, LLC is a law firm located in Sumter, South Carolina. We are writing in order to inform you of an incident that may have exposed your sensitive personal information. While we cannot be sure that your data was impacted, our internal review has confirmed that your data could have been exposed. We take the security of your personal information seriously and want to provide you with information and resources you can use to protect your information.

What Happened:

On September 2, 2022, we detected suspicious activity within our email environment. An unauthorized party gained access to one of our business email accounts. Upon discovering the unauthorized access, we immediately secured the email environment by changing passwords for the impacted account. We then promptly engaged third-party forensic specialists to assist us with securing the email environment and investigating the extent of the unauthorized activity.

Our investigation determined the unauthorized third party's motivations were likely in furtherance of attempted wire fraud. However, we could not rule out the possibility that your data was acquired by the unauthorized third party. As a result and out of an abundance of caution, we are notifying you of this incident.

As of this writing, Curtis & Croft, LLC has not received any reports of related identity theft since the date the incident was discovered (September 2, 2022 to present).

What Information Was Involved:

While we have found no evidence that your information has been specifically misused, it is possible that the following personal information could have been acquired by an unauthorized third party: first and last name, and social security number. This information was found in the real estate closing documentation that we maintain for standard operational and/or representative purposes.

### What We Are Doing:

Data security is one of our highest priorities. Upon detecting this incident we moved quickly to initiate a response, which included conducting an investigation with the assistance of IT specialists and confirming the security of our email environment. We are also reviewing and enhancing our technical safeguards to prevent a similar incident.

Additionally, we are providing you with access to Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services at no charge. These services provide you with alerts for twelve months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout through Identity Force, a TransUnion company specializing in fraud assistance and remediation services.

### What You Can Do:

To enroll in Credit Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/curtiscroft> and follow the instructions provided. When prompted please provide the following unique code to receive services: [REDACTED]. In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

We encourage you to take full advantage of this service offering. Cyberscout representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

Enclosed you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

### For More Information:

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call Cyberscout at 1-833-570-2946, Monday through Friday, 8:00 am – 8:00 pm EST.

Curtis & Croft, LLC values the security of the personal data that we maintain, and understand the frustration, concern, and inconvenience that this incident may have caused.

Sincerely,

William Croft  
Managing Partner

## Additional Information

**Credit Reports:** You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com), or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

**Security Freeze:** You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

<b>Equifax Security Freeze</b> P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 <a href="https://www.equifax.com/personal/credit-report-services/credit-freeze/">https://www.equifax.com/personal/credit-report-services/credit-freeze/</a>	<b>Experian Security Freeze</b> P.O. Box 9554 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com/freeze/center.html">www.experian.com/freeze/center.html</a>	<b>TransUnion Security Freeze</b> P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 <a href="http://www.transunion.com/credit-freeze">www.transunion.com/credit-freeze</a>
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**Fraud Alerts:** You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax ([https://assets.equifax.com/assets/personal/Fraud Alert Request Form.pdf](https://assets.equifax.com/assets/personal/Fraud%20Alert%20Request%20Form.pdf));
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at listed above.

**Monitoring:** You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

**File Police Report:** You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

**FTC and Attorneys General:** You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can 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), 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. This notice has not been delayed by law enforcement.

**For Maryland residents,** the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and [www.oag.state.md.us](http://www.oag.state.md.us).

**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 agencies 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 violators. 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 North Carolina residents,** the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and [www.ncdoj.gov](http://www.ncdoj.gov).

**For New York residents,** the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, and <https://ag.ny.gov/>.

**For Rhode Island residents,** the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.