



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

RECEIVED

JUN 03 2022

CONSUMER PROTECTION

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

May 31, 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 Dagle Electrical Construction Corp ("DEC Corp") located at 68 Industrial Way, Wilmington, MA 01887, and are writing to notify your office of an incident that may affect the security of certain personal information relating to seventy-eight (78) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, DEC Corp 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 February 9, 2022, DEC Corp became aware of suspicious activity related to certain internal computer systems and servers. DEC Corp immediately took steps to secure their network, minimize any disruption to operations, and launched an investigation with the assistance of third-party forensic and cybersecurity specialists into the nature and scope of the event. Through this investigation, DEC Corp determined that an unauthorized actor accessed certain systems within the DEC Corp network between January 27, 2022 and February 10, 2022. On or about April 18, 2022, the investigation determined that certain files may have been accessed as a result of this incident. DEC Corp then worked to identify the individuals whose information may have been impacted and contact information for those individuals. That work was completed on April 26, 2022. The information that could have been subject to unauthorized access includes name, Social Security number, and driver's license number.

Office of the New Hampshire Attorney General  
May 31, 2022  
Page 2

### **Notice to New Hampshire Residents**

On or about May 31, 2022, DEC Corp provided written notice of this incident to seventy-eight (78) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

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

Upon discovering the event, DEC Corp moved quickly to investigate and respond to the incident, assess the security of DEC Corp systems, and identify potentially affected individuals. Further, DEC Corp notified federal law enforcement regarding the event. DEC Corp is providing access to credit monitoring services for one (1) year, through Experian IdentityWorks, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, DEC Corp 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. DEC Corp 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.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4498.

Very truly yours,

Michael Jervis of  
MULLEN COUGHLIN LLC

MWJ/ams  
Enclosure

# EXHIBIT A



Return Mail Processing  
PO Box 999  
Suwanee, GA 30024

51661 \*\*\*\*\*SNGLP

SAMPLE A. SAMPLE - General Adult Letter

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



May 27, 2022

## NOTICE OF [Extra1]

Dear Sample A. Sample:

Dagle Electrical Construction Corp ("DEC Corp") is writing to inform you of a recent incident that may affect the security of some of your information. While we are not aware of any actual or attempted misuse of your information, we are providing you with an overview of the incident, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it necessary to do so.

**What Happened?** On February 9, 2022, DEC Corp became aware of suspicious activity related to certain internal computer systems and servers. We immediately took steps to secure our network, minimize any disruption to operations, and launched an investigation with the assistance of third-party forensic and cybersecurity specialists into the nature and scope of the event. Through this investigation, we determined that an unauthorized actor accessed certain systems within the DEC Corp network between January 27, 2022 and February 10, 2022. On or about April 18, 2022, the investigation determined that certain files may have been accessed as a result of this incident. We then worked to identify the individuals whose information may have been impacted and contact information for those individuals. That work was completed on April 26, 2022. DEC Corp is notifying you because the investigation determined that certain information relating to you may have been included in the impacted files.

**What Information Was Involved?** The investigation determined that your name, Social Security number, and driver's license was present in the potentially impacted files at the time of the incident. To date, DEC Corp has not received any reports of actual or attempted misuse of individuals' information.

**What We Are Doing.** We take this incident and the security of information within our care very seriously. In addition to the steps described above, we are working to review our existing policies and procedures, to provide additional training programs to employees, and are implementing additional safeguards to further secure the information in our systems.

As an added precaution, we are also offering [Extra2] months of complimentary access to credit monitoring, fraud consultation, and identity theft restoration services. Individuals who wish to receive these services must enroll by following the attached enrollment instructions.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements, monitoring your free credit reports and Explanation of Benefits for suspicious activity, and to detect errors over the next 12 to 24 months. You can find out more about how to protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Help Protect Your Information*. There you will also find more information on the credit monitoring services we are offering and how to enroll.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call the dedicated assistance line at (888) 397-0038, Monday – Friday, 9 am to 11 pm ET; Saturday – Sunday, 11 am to 8 pm ET.

Sincerely,

Maureen Dagle  
President

Dagle Electrical Construction Corp.

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

### Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorks<sup>SM</sup> for [Extra2] months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for [Extra2] months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration).

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra2] month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** August 31, 2022 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**: .

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (888) 397-0038 by August 31, 2022. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

### **ADDITIONAL DETAILS REGARDING YOUR [Extra2] MONTHS EXPERIAN IDENTITYWORKS MEMBERSHIP**

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. 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 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 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 District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 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). Dagle Electrical Construction Corp is located at 68 Industrial Way, Wilmington, MA 01887.

*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 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 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 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 is/are approximately 9 Rhode Island residents impacted by this incident.

NH DEPT OF JUSTICE  
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