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STATE OF NH
DEPT OF JUSTICE
2016 MAY -2 PM 12: 01

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April 26, 2016

Via First Class US Mail

Attorney General Joseph Foster
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General Foster:

We represent the website platform manager of Draper James, LLC ("Draper James") and are writing to notify your office, on behalf of Draper James, 21 West 46th Street, New York, NY, 10036, of an incident that may affect the security of personal information relating to one (1) New Hampshire resident(s). The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, our client does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Event

On March 24, 2016, following a security scan of its systems, our client learned that an unauthorized actor had utilized credentials to access the Draper James administrative login. Our client immediately notified Draper James and launched an investigation into this incident, with the assistance of third-party forensic investigators. On April 13, 2016, and as part of this investigation, our client confirmed the unauthorized actor placed a java script on the checkout pages of www.draperjames.com that captured customer information, including, but not limited to, the following for transactions initiated or completed between March 2, 2016 and March 24, 2016: (1) the customer's name; (2) the customer's address; (3) the customer's credit card number; (4) the customer's credit card expiration date; (5) the customer's credit card type; (6) the customer's credit card security code, and (7) the customer's email address. Transactions initiated or completed during this time frame that utilized saved credit card information or PayPal were not affected.

Notice to New Hampshire Resident(s)

On April 25, 2016, written notice was provided to all customers who may have been affected by this incident, providing details of the incident, information on steps individuals can take to protect against identity theft and fraud, and contact information individuals can use should they have questions or concerns. Written notice was provided in substantially the same form as the letter attached here as *Exhibit A*.

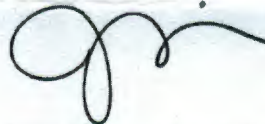
Other Steps Taken and To Be Taken

Upon discovering the incident, the vulnerability was quickly remediated, those individuals potentially affected by this incident were identified, and resources were put in place to assist the potentially affected individuals. All potentially affected individuals are being provided access to two free years of credit and identity monitoring services, through Experian and to a call-line for potentially affected individuals to utilize for questions or concerns regarding this incident and the services being offered. Additionally, all potentially impacted individuals are being provided access to additional information that can be used to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, 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, state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Written notice of this incident is also being provided to other state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 215-977-4081.

Very truly yours,



Jennifer A. Coughlin of
LEWIS BRISBOIS BISGAARD & SMITH LLP

JAC:mab
Encl.

EXHIBIT A

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<mail id>>
<<Recipient Name>>
<<Street Address>>
<<City>><<State>><<Zip>>

<<Date>>

RE: Notice of Data Security Incident

Dear <<Recipient Name>>:

We are writing to inform you of a recent event that may affect the security of your personal information entered during the checkout process at www.draperjames.com. While we are unaware of any actual or attempted misuse of your personal information, out of precaution, we are providing you with information about the incident, steps we are taking in response, and steps you can take to protect against fraud should you feel it is appropriate.

What Happened? On March 24, 2016, we were made aware of vulnerability in the security of the www.draperjames.com checkout pages that affected a small fraction of Draper James' customers. Upon discovery and with the assistance of our website platform manager, we immediately ensured the vulnerability was remedied and launched an investigation. While our investigation is ongoing, and we are unaware of any actual or attempted misuse of any customer information, on April 13, 2016, we confirmed the vulnerability may have compromised the security of certain customer information entered into the checkout pages of our website to make purchases during a very brief window of time this past March. The security of customer information entered during transactions utilizing PayPal or a saved credit card was not impacted by this incident.

What Information Was Involved? While our investigation is ongoing, we have confirmed the following information relating to you was entered during the checkout process and may be at risk as a result of this incident: name, address, email address, phone number, credit card type, credit card number, credit card security code, and expiration date.

What We Are Doing. We take the security of your information very seriously. We have ensured the vulnerability has been remediated. We continue to monitor the security of our systems and customer information. We are providing you with notice of this incident, as well as access to credit monitoring and identity restoration services at no cost to you. We are also providing notice of this incident to certain state regulators.

What You Can Do. The enclosed Privacy Safeguards contain instructions on how to enroll and receive the free credit monitoring and identity restoration services we are offering you. You can enroll to receive these free services. You can also review the enclosed Privacy Safeguards Information for additional information on how to better protect against identity theft and fraud.

For More Information. We are very sorry for any inconvenience or concern this incident may cause you. The security of your information is a priority to us, and we have taken steps to prevent an incident like this from happening again. Should you have any questions about the content of this letter or ways you can better protect yourself from the possibility of identity theft, please call our dedicated assistance line at 844-812-9305 between 9:00 a.m. to 9:00 p.m. Eastern Time, Monday through Friday, except holidays.

Sincerely,



Kevin Kelly
Director of Finance

PRIVACY SAFEGUARDS

To help protect your identity, we are offering a **complimentary** two-year membership in Experian's® ProtectMyID® Alert. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate ProtectMyID Now in Three Easy Steps

1. ENSURE That You Enroll By: July 31, 2016 (Your code will not work after this date.)
2. Visit the ProtectMyID Website to enroll: www.protectmyid.com/redeem
3. PROVIDE Your Activation Code: <<code>>

If you have questions or need an alternative to enrolling online, please call 877-371-7902 and provide engagement #: **PC100964**

Additional details regarding your 24-MONTH ProtectMyID Membership:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- **Free copy of your Experian credit report**
- **Surveillance Alerts for:**
 - **Daily 3 Bureau Credit Monitoring:** Alerts of key changes & suspicious activity found on your Experian, Equifax®, and TransUnion® credit reports.
- **Identity Theft Resolution and ProtectMyID ExtendCARE:** Toll-free access to U.S.-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts, including credit, debit, and medical insurance cards; assist with freezing credit files; and contact government agencies.
 - It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high level of Fraud Resolution support even after your ProtectMyID membership has expired.
- **\$1 Million Identity Theft Insurance¹:** Immediately covers certain costs, including lost wages, private investigator fees, and unauthorized electronic fund transfers.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, 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 877-297-7780.

In addition to enrolling to receive the free monitoring and restoration services we are offering to you, we encourage you to remain vigilant against incidents of identity theft and financial loss by reviewing your account statements and monitoring your credit reports for suspicious activity. Under U.S. law, everyone is entitled to one free credit report annually from each of the three major credit bureaus. To order a free credit report, visit www.annualcreditreport.com or call toll-free 1-877-322-8228. Individuals may also contact the three major credit bureaus directly to request a free copy of their credit report:

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

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

TransUnion
P.O. Box 2000
Chester, PA 19022
800-680-7289
www.transunion.com

¹ Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of AIG. The description herein is a summary, 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.

At no charge, you can also have these credit bureaus place a "fraud alert" on your credit file. A "fraud alert" will tell creditors to take additional steps to verify your identity prior to granting credit in your name; however, because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the credit bureaus verify your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your files. You may use the contact information listed above to contact the major credit bureaus and place a "fraud alert" on your credit report.

You can also place a "security freeze" on your credit file that prohibits a credit bureau from releasing any information from your credit report without your written authorization, but it may delay, interfere with, or prevent the timely approval of any requests for new credit. If you have been a victim of identity theft and provide the credit bureau with a valid police report, the credit bureau cannot charge to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. If you incur a cost to place a security freeze, please let us know. You must contact each of the credit bureaus separately to place a security freeze on your credit file:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
800-685-1111
800-349-9960 (NY Residents)
[www.equifax.com/help/
credit-freeze/en_cp](http://www.equifax.com/help/credit-freeze/en_cp)

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
888-397-3742
[www.experian.com/freeze/
center.html](http://www.experian.com/freeze/center.html)

TransUnion LLC
P.O. Box 2000
Chester, PA 19022
888-909-8862
[www.transunion.com/
securityfreeze](http://www.transunion.com/securityfreeze)

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at 600 Pennsylvania Avenue, NW, Washington, D.C. 20580; www.ftc.gov/idtheft; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. **For Maryland residents**, the Attorney General can be reached at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. **For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 919-716-6400, www.ncdoj.gov.

Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.