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CONSUMER PROTECTION

# BakerHostetler

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July 31, 2020

### VIA OVERNIGHT MAIL

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

*Re: Incident Notification*

Dear Attorney General MacDonald:

We are writing on behalf of our client, Empire Golf Management, LLC ("Empire"), to notify you of a security incident.

Empire recently concluded its investigation of an incident involving some of its systems. Empire first became aware of suspicious system activity on March 21, 2020. Upon identifying the suspicious activity, Empire immediately started an investigation with the assistance of a leading cybersecurity firm. Through this investigation, Empire determined that an unauthorized party may have accessed some of its computer servers and workstations between the dates of February 4, 2020 and March 21, 2020. Upon learning of this, Empire secured the involved devices and took them offline.

Empire then undertook a comprehensive review of the data that could have potentially been accessed as a result of the incident and determined that the data related to some of its current and former employees and golf club members. On July 31, 2020, Empire discovered that the information involved may have included names and Social Security numbers of two (2) New Hampshire residents. To date, Empire has no evidence that any of the information has been misused.

Beginning on July 31, 2020, Empire will mail notification letters via United States Postal Service First-Class mail to two New Hampshire residents in accordance with N.H. Rev. Stat. Ann. § 359-C:20. Empire Golf is offering a complimentary one-year membership in credit monitoring

Attorney General Gordon MacDonald  
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and identity theft protection services through ID Experts. A copy of the notification letter is enclosed.

To help prevent something like this from happening in the future, Empire has implemented additional security measures, including the deployment of enhanced monitoring and alerting software.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David B. Sherman". The signature is fluid and cursive, with a large initial "D" and "S".

David B. Sherman  
Partner

Enclosure

  
EMPIRE  
GOLF MANAGEMENT  
C/O ID Experts  
P.O. Box 1907  
Suwanee, GA 30024

To Enroll, Please Call:  
1-833-573-0853  
Or Visit:  
<https://app.myidcare.com/account-creation/protect>  
Enrollment Code: <<XXXXXXXXXX>>

<<Name 1>><<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<City>><<State>><<Zip>>

July 31, 2020

Dear <<Name 1>>:

Empire Golf Management, LLC ("Empire"), is committed to protecting the confidentiality and security of the personal information we receive and maintain. We are writing to inform you of an incident that involves some of your information. This notice explains the incident, measures we have taken, and some steps you can take in response.

We recently learned of a data security incident involving some of our computer systems. Upon identifying the suspicious activity, Empire immediately secured the affected systems, started an investigation, and a leading cyber security firm was hired to assist. Through this investigation, Empire determined that an unauthorized party accessed some of our computer servers and workstations between February 4, 2020 and March 21, 2020. We have undertaken a comprehensive review of the data that could have potentially been accessed by the unauthorized party and, on July 9, 2020, determined that information included your <<VARIABLE DATA >>.

While we have no indication that your information has been misused, we wanted to notify you of this incident and assure you that we take it very seriously. In addition, we are offering complimentary identity theft protection services through ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: 12 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised. To enroll in MyIDCare services, visit <https://app.myidcare.com/account-creation/protect> or call 1-833-573-0853, Monday through Friday from 9 am – 9 pm Eastern Time and using the Enrollment Code provided above. Please note the deadline to enroll is October 30, 2020.

We regret any inconvenience or concern this incident may cause you. To help prevent something like this from happening in the future, we are implementing additional technical security measures and increasing employee cybersecurity training. If you have any questions, please call 1-833-573-0853, Monday through Friday from 9 am – 9 pm Eastern Time.

Sincerely,



Rudy Virga  
Director of Operations

## ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com), 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *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)

### **Fraud Alerts and Credit or Security Freezes:**

***Fraud Alerts:*** There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report 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 one year. You may have an extended alert placed on your credit report 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.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

***Credit or Security Freezes:*** You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

***How do I place a freeze on my credit reports?*** There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com)
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

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 bureau will provide you with 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.

*How do I lift a freeze?* A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

**Additional information for residents of the following states:**

**Maryland:** Empire Golf Management's mailing address is 3 Cavalry Drive, New City, NY 10956 and the phone number is 845-362-9146. You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, [www.oag.state.md.us](http://www.oag.state.md.us)

**New York:** You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

**North Carolina:** You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov)