



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

JUL 06 2021

CONSUMER PROTECTION

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1127 High Ridge Road, #301
Stamford, CT 06905

June 29, 2021

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 Freund, Freeze & Arnold, LLP (“FF&A”) located at 1 S. Main Street, Suite 1800, Dayton, OH 45402-2017, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, FF&A does not waive any rights or defenses regarding the applicability of New Hampshire the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On January 20, 2021, FF&A became aware of unusual activity in an employee’s e-mail account. In response, FF&A took steps to secure the mailbox, and began working with a third-party forensic specialist firm to investigate the nature and scope of the incident. The investigation determined that there was unauthorized access by an unknown individual to the employee’s e-mail account between January 5, 2021, and January 25, 2021. The investigation, however, was not able to identify whether there was access to any particular email or attachment. Following this determination, FF&A undertook an in-depth, lengthy, and labor-intensive process to identify whether sensitive information may have been contained within the e-mail account at issue, identify the individuals whose information may have been impacted, and review internal FF&A records to identify address information for potentially impacted individuals.

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Office of the New Hampshire Attorney General

June 29, 2021

Page 2

This review was completed on May 13, 2021. The information that could have been subject to unauthorized access includes name, address, and Social Security number.

Notice to New Hampshire Resident

On or about June 29th, 2021, FF&A provided written notice of this incident to all affected individuals, which includes one (1) New Hampshire resident. 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, FF&A moved quickly to investigate and respond to the incident, assess the security of FF&A systems, and notify potentially affected individuals. FF&A is also working to implement additional safeguards and training to its employees. FF&A is providing access to credit monitoring services for one (1) year, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, FF&A 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. FF&A is providing individuals with 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, 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) 930-1509.

Very truly yours,



Gregory J. Bautista of
MULLEN COUGHLIN LLC

GJB /ams

EXHIBIT A



FREUND, FREEZE & ARNOLD
A LEGAL PROFESSIONAL ASSOCIATION

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

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

<<Variable Header>>

Dear <<Name 1>>:

Freund Freeze & Arnold ("FF&A") is writing to inform you, out of caution, of a recent incident that **may** have involved some of your personal information. We want to provide you with an overview of the incident, our response thus far, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it necessary. While we do not currently have any reason to believe that any identity theft has occurred, we nonetheless want to keep you informed. We apologize for any inconvenience or concern this incident may have caused you.

What Happened? On January 20, 2021, FF&A became aware of unusual activity in an employee's email account. In response, FF&A took steps to secure the mailbox, and began working with a third-party forensic specialist firm to investigate the nature and scope of the incident. The investigation determined that there was unauthorized access by an unknown individual to the employee's e-mail account between January 5, 2021, and January 25, 2021. The investigation, however, was not able to identify whether there was access to any particular email or attachment.

Following this determination, we undertook an in-depth, lengthy, and labor-intensive process to identify whether sensitive information may have been contained within the email account at issue, identify the individuals whose information may have been impacted, and review internal FF&A records to identify address information for potentially impacted individuals. This review was completed on May 13, 2021. FF&A is notifying you out of an abundance of caution because the investigation determined that certain information relating to you **may** have been in the email account.

What Information Was Involved? The following information about you was present within the employee's email account: your name, <<Breached Elements>>. There is no indication that your information was subject to actual or attempted misuse.

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, as part of our ongoing commitment to the privacy of personal information in our care, we are undertaking a review of our existing policies, procedures, and training programs and implementing additional safeguards to further secure the information in our systems.

As an added precaution, we are also offering <<12/24>> 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 and monitoring your free credit reports for suspicious activity and to detect errors. 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 Personal 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 855-866-9968, Monday through Friday 9 a.m. to 9 p.m. Eastern, except holidays.

Sincerely,

A handwritten signature in black ink that reads "Susan Blasik-Miller". The signature is written in a cursive, flowing style.

Susan Blasik-Miller
Chief Executive Officer
Freund, Freeze & Arnold

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Go to www.equifax.com/activate.

Enter your unique Activation Code of <<ACTIVATION CODE>> then click "Submit" and follow these 4 steps:

1. **Register:**
Complete the form with your contact information and click "Continue".
If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.
2. **Create Account:**
Enter your email address, create a password, and accept the terms of use.
3. **Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click 'Sign Me Up' to finish enrolling.
You're done!
The confirmation page shows your completed enrollment.
Click "View My Product" to access the product features.

To sign up for US Mail delivery, dial 1-855-833-9162 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.

1. Activation Code: You will be asked to enter your activation code as provided at the top of this letter.

2. Customer Information: You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.

3. Permissible Purpose: You will be asked to provide Equifax with your permission to access your Equifax credit file and to monitor your file. Without your agreement, Equifax cannot process your enrollment.

4. Order Confirmation: Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity cannot be verified using the information provided). Please allow up to 10 business days to receive this information.

¹ WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

² The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

³ Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com.

⁴ The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. 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 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 credit 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:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	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; 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 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.

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, 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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 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 are 2 Rhode Island residents impacted by this incident.



FREUND, FREEZE & ARNOLD
A LEGAL PROFESSIONAL ASSOCIATION

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

<<Mail ID>>
Parent or Guardian of
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

<<Variable Header>>

Dear Parent or Guardian of <<Name 1>>:

Freund Freeze & Arnold ("FF&A") is writing to make you aware of an incident that may affect the security of some of your minor's information. We take this incident seriously, and write to provide you information about the incident, what we did in response, and the resources available to you to help better protect your minor's personal information from possible misuse, should you feel it is appropriate to do so. We apologize for any inconvenience or concern this incident may have caused you.

What Happened? On January 20, 2021, FF&A became aware of unusual activity in an employee's email account. In response, FF&A took steps to secure the mailbox, and began working with a third-party forensic specialist firm to investigate the nature and scope of the incident. The investigation determined that there was unauthorized access by an unknown individual to the employee's email account between January 5, 2021, and January 25, 2021. The investigation, however, was not able to identify whether there was access to any particular email or attachment.

Following this determination, we undertook an in-depth, lengthy, and labor-intensive process to identify whether sensitive information may have been contained within the email account at issue, identify the individuals whose information may have been impacted, and review internal FF&A records to identify address information for potentially impacted individuals. This review completed on May 13, 2021. FF&A is notifying you out of an abundance of caution because the investigation determined that certain information relating to your minor may have been in the email account.

What Information Was Involved? The following information about your minor was present within the employee's email account: your minor's name, <<Breached Elements>>. There is no indication that your minor's information was subject to actual or attempted misuse.

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, as part of our ongoing commitment to the privacy of personal information in our care, we are undertaking a review of our existing policies, procedures, and implemented additional safeguards to further secure the information in our systems.

As an added precaution, we are offering your minor access to Equifax's Child Monitoring for 12 months, at no cost. You may find information on how to enroll in these services in the enclosed "Steps You Can Take to Help Protect Your Minor's Personal Information." We encourage you to enroll your minor in these services as we are not able to do so on your minor's behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your minor's account statements and free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed "Steps You Can Take to Help Protect Your Minor's Information."

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 855-866-9968, Monday through Friday, 9 a.m. to 9 p.m. Eastern, except holidays.

Sincerely,

A handwritten signature in black ink that reads "Susan Blasik-Miller". The signature is written in a cursive, flowing style.

Susan Blasik-Miller
Chief Executive Officer
Freund, Freeze & Arnold

STEPS YOU CAN TAKE TO HELP PROTECT YOUR MINOR'S PERSONAL INFORMATION

Enroll Child Monitoring

- Child Monitoring for up to four children under the age of 18
- Emailed notifications to the primary adult member of activity on the child's Equifax credit report

Enrollment Instructions

Parent/guardian Go to www.equifax.com/activate.

Enter your unique Activation Code of <<ACTIVATION CODE>> then click "Submit" and follow these 4 steps:

1. **Register:** Complete the form with parent/guardian contact information and click "Continue". *If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.*
2. **Create Account:** Enter parent/guardian email address, create a password, and to accept the terms of use.
3. **Verify Identity:** To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:** Upon successful verification of parent/guardian identity, you will see the Checkout Page. Click 'Sign Me Up' to finish enrolling. The confirmation page shows parent/guardian completed enrollment. Click "View My Product" to access the product features and enroll minor children.

How to Add Minors to Your Equifax Child Monitoring Package

You will be able to add minors to your Equifax Child Monitoring Package through your product dashboard.

1. Sign in to your account to access the "Your People" module on your dashboard.
2. Click the link to "Add a Child".
3. From there, enter your child's first name, last name, date of birth and social security number.

Repeat steps for each minor child (up to four).

Equifax will then create an Equifax credit file for your child, lock it and then alert you if there is any activity on that child's Equifax credit file. You can add up to 4 children under the age of 18 to your Equifax Child Monitoring Package.

Monitor Your Minor's Accounts

Typically, credit reporting agencies do not have a credit report in a minor's name. To find out if your minor has a credit report or to request a manual search for your minor's Social Security number each credit bureau has its own process. To learn more about these processes or request these services, you may contact the credit bureaus by phone or in writing or you may visit the below websites:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/education/identity-theft/child-identity-theft/	www.experian.com/fraud/form-minor-child.html	www.transunion.com/credit-disputes/child-identity-theft-inquiry-form
1-800-685-1111	1-888-397-3742	1-888-909-8872
P.O. Box 105788 Atlanta, GA 30348-5788	P.O. Box 9554 Allen, TX 75013	P.O. Box 2000 Chester, PA 19016

To request information about the existence of a credit file in your minor's name, search for you minor's Social Security number, place a credit freeze on your minor's credit file, place a fraud alert on your minor's credit report (if one exists), or request a copy of your minor's credit report you may be required to provide the following information:

- A copy of your driver's license or another government issued identification card, such as a state identification card, etc.;
- proof of your address, such as a copy of a bank statement, utility bill, insurance statement, etc.;
- A copy of your minor's birth certificate;
- A copy of your minor's Social Security card;
- Your minor's full name, including middle initial and generation, such as JR, SR, II, III, etc.;
- Your minor's date of birth; and
- Your minor's previous addresses for the past two years.

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps individuals may take to protect 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; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that 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 your minor experiences 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 your minor has 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: 441 4th St. NW #1100 Washington, D.C. 20001; 202-727-3400; and 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.

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, 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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 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 are 2 Rhode Island residents impacted by this incident.