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CONSUMER PROTECTION



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February 2, 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 Glatt, Maney, Kling & Rufer, CPAs P.C. (“GMKR”) located at 225 Broadway, Suite 600, New York, New York 10007, and are writing to notify your office of an incident that may affect the security of some personal information relating to thirteen (13) New Hampshire residents. 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, GMKR 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 or about August 24, 2020, GMKR became aware of a security incident involving its computing environment. After identifying potentially suspicious activity, GMKR immediately began an investigation to determine if any information was impacted. On November 23, 2020, GMKR completed its investigation and identified individuals associated with personal information contained in a database that could have been accessed by an unknown, unauthorized third party, including name, address, Tax ID, and/or Social Security number. While the investigation determined it is unlikely that the database was subject to unauthorized access and that any personal information was accessed or misused, GMKR is notifying all individuals with protected information in the database out of an abundance of caution.

Notice to New Hampshire Residents

On or about February 2, 2021, GMKR provided written notice of this incident to all affected individuals, which includes thirteen (13) 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, GMKR moved quickly to investigate and respond to the incident, assess the security of GMKR systems, and notify potentially affected individuals. GMKR is also working to implement additional safeguards and training to its employees. GMKR is providing access to credit monitoring services for one (1) year, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, GMKR 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. GMKR 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) 930-1697.

Very truly yours,



Amanda Harvey of
MULLEN COUGHLIN LLC

ANH:mf1

Exhibit A

Glatt, Maney, Kling & Rufer, P.C.
CERTIFIED PUBLIC ACCOUNTANTS

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>>

Dear <<Name 1>>:

At Glatt, Maney, Kling & Rufer, CPAs P.C. (“GMKR”), we understand that the confidentiality of your information is very important, and we are committed to protecting it. We are writing to make you aware of an incident that may affect the security of some of your personal information. You are receiving this letter because <<Variable Field(1)>>. This letter provides details of the incident, our response, and resources available to you to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

What Happened? On August 24, 2020, GMKR learned that it was the target of a cybercriminal attack and that portions of our computer network were infected with malware. In response, we immediately took our systems offline, engaged cybersecurity experts, and launched an investigation into the nature and scope of the incident. Unfortunately, on November 23, 2020, we confirmed that certain files that contain your personal information could have been accessed by an unknown, unauthorized party. Importantly, your sensitive information that could have been accessed was stored in a third-party application, and the investigation did not discover any evidence that the cybercriminals accessed this application during the incident. However, we are dedicated to transparency and value the privacy of our clients’ personal information, so we are notifying all potentially impacted individuals out of an abundance of caution.

What Information was Involved? The files that may have been accessed includes your <<Variable Field(2)>>.

What we are Doing. Information security is among GMKR’s highest priorities, and GMKR has strict security measures in place to protect information in our care. Upon discovering this incident, we immediately took steps to review and reinforce the security of our systems. We are reviewing existing security policies and have implemented additional cybersecurity measures to further protect against similar incidents moving forward. We are notifying potentially impacted individuals, including you, so that you may take steps to protect your information.

As an added precaution, we are offering you access to credit monitoring and identity theft protection services for <<12/24>> months at no cost to you. You will find information on how to enroll in these services in the enclosed “*Steps You Can Take to Help Protect Your Information*.” We encourage you to enroll in these services as we are not able to do so on your behalf.

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. Please also review the information contained in the enclosed “*Steps You Can Take to Help Protect Your 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 our dedicated assistance line at 800-401-2909 between the hours of 9am and 9pm EST Monday through Friday except holidays. We take this incident very seriously and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Glatt, Maney, Kling & Rufer, CPAs P.C.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online **credit monitoring service** (*myTrueIdentity*) provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

How to Enroll: You can sign up online or via U.S. mail delivery.

- To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as "Enter Activation Code," enter the 12-letter Activation Code <>**<>Insert Unique 12-letter Activation Code**<> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based, three-bureau credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <>**<>Insert static 6-digit Telephone Pass Code**<> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <>**<>Enrollment Deadline**<>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain <>**<>12/24**<> months of unlimited access to your TransUnion credit report and credit score.
- The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion®, Experian®, and Equifax®, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

Monitor Accounts

Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872
www.transunion.com/credit-freeze

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your 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 agencies listed below:

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud:center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

Additional Information

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 N.W., Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338). 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.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft. **Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300. **Maryland Residents:** Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023. **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 a violator. 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. You can 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. **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; <https://ag.ny.gov/>. **North Carolina Residents:** Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC). **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392. **Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 8 Rhode Island residents impacted by this incident. **Washington D.C. Residents:** The Office of Attorney General for the District of Columbia can be reached at: 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001; 1-202-442-9828; <https://oag.dc.gov>. **All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338).