

10/25/2019

Attorney General Gordon MacDonald
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301

RECEIVED

NOV 04 2019

CONSUMER PROTECTION

Re : JA Glynn & Co
Notification of Security Incident under New Hampshire Rev. Stat. § 359-C:20

Dear Attorney General MacDonald:

We write to advise you of an incident involving unauthorized access to personal information of 8 New Hampshire residents who are or were clients of our affiliates JA Glynn Investments, an SEC-registered broker-dealer, or JAG Capital Management, an SEC registered Investment Advisor. We anticipate that consumer notices will be sent by mail on or about 10/25/2019. Through our internal security procedures, we discovered that an employee's email account was compromised on or about April 11, 2019.

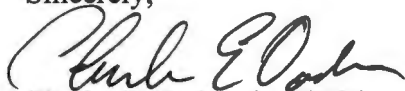
The employee's email account contained correspondence relating to maintaining consumer accounts and in some cases attachments. Because of the nature of the involved information that was included in forms in the affected mailbox, determination of the information and individuals involved in the incident took several months and involved a manual process for reconstruction. We were able to determine that the personal information involved included in all cases the individual's name and a financial account number, though in many instances the account had been closed well prior to the incident. For some individuals, the forms also included their Social Security number and date of birth.

All involved individuals will be offered two years of free credit monitoring and identity theft prevention services through Experian.

We engaged an outside cybersecurity firm to assist us in investigating the incident and developing additional, precautionary steps that we believe will mitigate the possibility of any future similar occurrences. These measures include enhanced security features that we have added to our email system, as well as improved internal processes and procedures regarding cybersecurity.

Attached is a copy of the letter to be sent to state resident. We trust that this letter and its enclosures provide you with all the information required to assess this incident and our response. Please contact us at the information below if you have additional questions or if we can be of further assistance.

Sincerely,



Charles E. Dodson | VP/CCO
JAG Capital Management LLC

9841 Clayton Road, St. Louis, MO 63124
Phone 314.997.1277
cdodson@jaglynn.com

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

October 15, 2019



E9608-L02-0000002 P001 T00002 *****MIXED AADC 159

SAMPLE A SAMPLE - CS FULL PII

APT 123

123 ANY ST

ANYTOWN, US 12345-6789



Re: IMPORTANT NOTICE ABOUT YOUR PERSONAL INFORMATION

Dear Sample B Sample:

I am writing to notify you of a recent security incident that may involve your personal information. Through our internal security procedures, we discovered that an employee's email account was compromised on April 11, 2019. The employee's email account contained correspondence relating to maintaining consumer accounts and in some cases attachments. Although we cannot be certain, we believe some of your personal information may have been accessed, including your name, Social Security number, date of birth and account number. This information was contained in account documentation provided to us via email by Credit Suisse, which was then retained within our email system as part of our document retention policy. As you may be aware, Credit Suisse closed its private banking operation in the United States in 2015, and your account with them has since been closed.

Unfortunately, security incidents occur at many companies and organizations and are frequently in the news. Hackers target entities with personal information, and some incidents involve thousands or even millions of persons' information.

We take client privacy seriously, and we want to inform you of what we are doing to protect you and what you can do to protect yourself.

We have engaged an outside cybersecurity firm to assist us in developing additional, precautionary steps that we believe will mitigate the possibility of any future similar occurrences. These measures include enhanced security features that we have added to our email system, as well as improved internal processes and procedures regarding cybersecurity.

Additionally, we stand ready to assist you in taking steps to protect yourself from possible unauthorized use of your personal information, and we want to make sure you are aware of the resources that are available to you to diminish any inconvenience you may experience.

To help protect your identity, we are offering a complimentary two-year membership of Experian's® IdentityWorksSM. This product provides you with identity detection and resolution of identity

0000002



E9608-L02

theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: 01/31/2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks enroll at: www.experianidworks.com/credit
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 704-9394 by **01/31/2020**. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your 24-month 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 agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (833) 704-9394. 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 (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 this Identity Restoration support is available to you for one year 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. You will also find self-help tips and information about identity protection at this site.

* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and 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.

We hope this letter provides you with the information you need, but please do not hesitate to call us at (800)966-4596 so that we can discuss this situation with you. You may also contact us at 9841 Clayton Road, St. Louis MO 63124 or www.jaglynn.com.

Sincerely,



Charles Dodson
Chief Compliance Officer

0000002



E9608-L02

Additional Steps for Protection

While we are taking actions to protect you, there are also steps you may wish to take to protect yourself and resources that may assist you.

You should be vigilant for the next 12 to 24 months, for example, by carefully reviewing your credit reports and bank, credit card and other account statements. If you discover suspicious activity on your credit report, your accounts or by any other means, you may wish to contact law enforcement and file a police report of identity theft. Also, please notify us of any suspicious activity.

You may contact the fraud departments of the three major credit reporting agencies to discuss your options. You have the right to place a free 90-day fraud alert on your credit file. A fraud alert lets creditors know to contact you before opening new accounts. It also may delay your ability to obtain credit. To place a fraud alert on your credit report contact the three credit reporting agencies below.

**Equifax Credit
Information Services, Inc.**
P.O. Box 105788
Atlanta, GA 30348
(888) 766-0008
www.equifax.com

Experian
P.O. Box 9554
Allen, TX 75013
(888) 397-3742
www.experian.com

**TransUnion Fraud
Victim Assistance
Department**
P.O. Box 6790
Fullerton, CA 92834
(800) 680-7289
www.transunion.com

You can also obtain information from these sources about security freezes. You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit.

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, P.O. Box 9554, Allen, TX 75013, www.experian.com
TransUnion Security Freeze, P.O. Box 160, Woodlyn, PA 19094, www.transunion.com
Equifax Security Freeze, P.O. Box 105788, Atlanta, GA 30348, www.equifax.com

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 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 the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique personal identification number (“PIN”) or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to remove the security freeze.

Fair Credit Reporting Act: You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (<https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC’s list of FCRA rights includes:

- You have the right to receive a copy of your credit report. The copy of your report must contain all the information in your file at the time of your request.
- Each of the nationwide credit reporting companies – Experian, TransUnion and Equifax – is required to provide you with a free copy of your credit report, at your request, once every 12 months.
- You are also entitled to a free report if a company takes adverse action against you, like denying your application for credit, insurance, or employment, and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You are also entitled to one free report a year if you are unemployed and plan to look for a job within 60 days; if you’re on welfare; or if your report is inaccurate because of fraud, including identity theft.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.

000002



- Access to your file is limited and you must give your consent for reports to be provided to employers.
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.

You may wish to learn more about identity theft. The Federal Trade Commission has on-line guidance about the steps that consumers can take to protect themselves against identity theft. You may also obtain information about steps you can take to avoid identity theft from the following:

For all US Residents:
Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
(877) FTC-HELP or (877) 382-4357
<http://www.ftc.gov>

For Maryland Residents:
Maryland Office of the Attorney General
200 St. Paul Place
Baltimore, MD 21202
(888)-743-0023
<http://www.oag.state.md.us/index.htm>

For North Carolina Residents:
NC Attorney General’s Office
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
(919) 716-6000
<http://www.ncdoj.gov/>

For Rhode Island Residents: Rhode Island Office of the Attorney General
150 South Main Street
Providence, RI 02903
(401) 274-4400
<http://www.riag.ri.gov/>

Iowa residents may report suspected incidents of identity theft to local law enforcement or to the Iowa Attorney General.