

STATE OF NH  
DEPT OF JUSTICE  
2020 DEC 30 PM 12:12

**BakerHostetler**

**Baker&Hostetler LLP**

Key Tower  
127 Public Square, Suite 2000  
Cleveland, OH 44114-1214

T 216.621.0200  
F 216.696.0740  
www.bakerlaw.com

William H. Berglund  
direct dial: 216.861.7416  
wberglund@bakerlaw.com

December 28, 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, Liberty Title Agency, Inc. ("Liberty Title"), to provide notice of a security incident involving five New Hampshire residents.<sup>1</sup> Liberty Title is a real estate title agency based in Michigan.

Liberty Title completed an investigation into unauthorized access to some of its company servers. That investigation determined that the access occurred on May 14, 2020. Upon discovering the incident, Liberty Title immediately took steps to secure its systems, contacted law enforcement, and began an investigation with the assistance of a cybersecurity firm. Liberty Title's investigation determined that an unauthorized person accessed certain files on its servers and transferred at least some of those files outside of the network. On October 22, 2020, Liberty Title determined that the files accessed and/or transferred out of its network by the unauthorized person contained information pertaining to certain individuals, five of whom were determined to be New Hampshire residents. The information included the individuals' names and financial account numbers.

Beginning today, December 28, 2020, Liberty Title will mail written notification via First-Class U.S. mail to the New Hampshire residents. A sample copy of the notification letter is enclosed. Liberty Title has encouraged residents to remain vigilant for incidents of fraud or identity

---

<sup>1</sup> This notice does not waive Liberty Title's objection that New Hampshire lacks personal jurisdiction over it regarding any claims related to this incident.

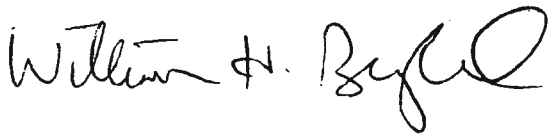
Attorney General Gordon MacDonald  
December 28, 2020  
Page 2

theft by reviewing their account statements for any unauthorized activity. Liberty Title has established a dedicated phone number that individuals may call with related questions.

To further protect personal information, Liberty Title continues to review its systems and has implemented additional measures to further enhance and strengthen its existing security processes.

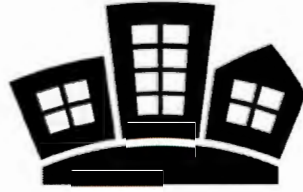
Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "William H. Berglund". The signature is written in a cursive style with a large, prominent "W" and "B".

William H. Berglund  
Counsel

Enclosure



## LIBERTY TITLE

«First\_Name» «Middle\_Name\_or\_Initial» «Last\_Name» «Suffix\_Jr\_II\_III»  
«Street\_Address»  
«City», «State» «Zip\_Code»

12/28/2020

Dear «First\_Name»:

At Liberty Title Agency, Inc. ("Liberty Title"), we understand the importance of protecting and securing the personal information that we maintain. I am writing to inform you of an incident that may have involved some of your information. This notice explains the incident, measures we have taken, and some steps you can take in response.

We completed an investigation into unauthorized access to some of our company servers. Our investigation determined that the access occurred on May 14, 2020. Upon discovering the incident, we immediately took steps to secure our systems, contacted law enforcement, and began an investigation with the assistance of a cybersecurity firm. Our investigation determined that an unauthorized person accessed certain files on our servers and transferred at least some of those files outside of our network. We negotiated with the unauthorized person to ensure that your information would not be further disclosed and we obtained confirmation that the files that had been removed were destroyed. On October 22, 2020, we determined that your «Variable\_Data» were contained in the files accessed and/or transferred out of our network by the unauthorized person.

We want to assure you that we take this incident very seriously and although to date, we have no evidence of any misuse of your information, we wanted to inform you of this incident and offer general recommendations on ways to protect your information. As always, we encourage you to remain vigilant for incidents of fraud or identity theft by reviewing your account statements for any unauthorized activity. For more information on identity theft prevention, please see the additional information provided in this letter.

We deeply regret any inconvenience or concern this incident may cause you. To further protect personal information, we continue to review our systems and we have implemented additional measures to further enhance and strengthen our existing security processes. If you have any questions, please call 1-800-405-6108, Monday through Friday from 8:00 a.m. to 5:00 p.m. Eastern time.

Sincerely,

Tom Richardson  
General Counsel/CEO

## 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:***

**Connecticut:** You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, [www.ct.gov/ag](http://www.ct.gov/ag)

**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)

**Rhode Island:** This incident involves 1 individual in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, [www.riag.ri.gov](http://www.riag.ri.gov).

**Summary of Your Rights Under the Fair Credit Reporting Act:** The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- 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.
- Access to your file is limited.
- 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 have a 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.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.