



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

DEC 27 2017

CONSUMER PROTECTION

Christopher J. DiLenno
Office: 267-930-4775
Fax: 267-930-4771
Email: cdiienzo@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

December 18, 2017

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent Michael Saunders & Company, ("Michael Saunders"), 100 S. Washington Blvd., Sarasota, FL 34236, and are writing to notify your office of an incident that may affect the security of personal information relating to four (4) New Hampshire residents. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Michael Saunders not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Event

On June 6, 2017, Michael Saunders learned that several employees received emails requesting recipients provide the credentials to their email accounts. Upon discovering that these were phishing emails, Michael Saunders launched an internal investigation to determine the nature and scope of this event. A leading forensic investigation firm was retained to assist with these efforts. On June 30, 2017, the forensic investigator confirmed that one of Michael Saunders' employees received a phishing email and provided access to their Michael Saunders email account. Michael Saunders conducted a detailed review of the contents of the email account and on November 20, 2017, Michael Saunders confirmed that personal information for a number of individuals was contained in the compromised email account and may have been accessible to the unauthorized actor.

Through this review, it was determined that the following types of information may have been accessible to the unauthorized actor: name, address, and Social Security number, and/or driver's license number, if contained in the compromised account. We note that there is no confirmation that any personally identifiable information was actually accessed, acquired, or misused.

Notice to New Hampshire Residents

On June 6, 2017, Michael Saunders emailed a preliminary notification to potentially affected individuals to inform them of the incident and discuss the status of the investigation. A copy of the email sent to potentially affected individuals is attached here as *Exhibit A*. On December 18, 2017, Michael Saunders began providing written notice of this incident to all affected individuals, which includes four (4) New Hampshire residents. Written notice will be provided in substantially the same form as the letter attached here as *Exhibit B*.

Other Steps Taken and To Be Taken

Upon discovering the unauthorized access to personal information, Michael Saunders moved quickly to identify those that may be affected, to put in place resources to assist them, and to provide them with notice of this incident. Michael Saunders is also working to implement additional safeguards to protect the security of information in its system.

Michael Saunders is providing all potentially affected individuals access to 12 free months of credit monitoring and identity repair services, including identity restoration services, through AllClear ID, and has provided a phone number for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, Michael Saunders is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, 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. Michael Saunders is also providing written notice of this incident to other state regulators as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4775.

Very truly yours,



Chris DiLenno of

MULLEN COUGHLIN LLC

EXHIBIT A

Subject Notice of Phishing Email

Date: June 6, 2017

Body To Our Valued Partners,

You may have recently received an email purporting to be from MSC Title employee, Sharon Hissam, or MSC employee, Dina VanDuyne, that prompted you to click a link. Please be aware that this email was not from a legitimate MSC source.

If you received an email of this nature, we recommend that you delete it. Further, if you did click on the link included in the email, we suggest reporting this to your IT staff immediately. You may also wish to change your passwords for your online accounts.

We want to assure you that we take this very seriously. The involved MSC email accounts have been secured. Although we continue to investigate this, we have no evidence that any personal information, other than the email address, has been misused.

We regret any inconvenience or concern this incident may cause. If you have any questions, please contact David Gumpper at MscIT-SpamWarning@michaelsaunders.com.

Sincerely,
Michael Saunders & Company

EXHIBIT B

Michael Saunders & Company.

LICENSED REAL ESTATE BROKER

Processing Center • P.O. BOX 141578 • Austin, TX 78714



00003
ACD1234

00058
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

December 18, 2017

Re: Notice of Data Breach

Dear John Sample:

Michael Saunders & Company (“Michael Saunders”) is writing to inform you of a recent incident that may impact the security of your personal information. We wanted to provide you with notice of this incident, our response, and steps you can take to better protect against fraud, should you feel it necessary to do so.

What Happened? On June 6, 2017, Michael Saunders learned that several employees received emails requesting recipients provide the credentials to their email accounts. Upon discovering that these were phishing emails, we launched an internal investigation to determine the nature and scope of this event. A leading forensic investigation firm was retained to assist with these efforts. On June 30, 2017, the forensic investigator confirmed that one of Michael Saunders’ employees received a phishing email and provided access to their Michael Saunders email account. We conducted a detailed review of the contents of the email account and on November 20, 2017, we confirmed that your information was contained in the compromised email account and may have been accessible to the unauthorized actor.

What Information Was Involved? The investigation has determined your personal information may have been accessible in the compromised email account because of your professional relationship with Michael Saunders & Company. This information may include your name, address, Driver's License number, and health insurance information, if contained in the compromised email accounts. *Please note that there is no evidence of the actual or attempted misuse of your information, and we have no evidence that your information was taken. Nonetheless, we are notifying you out of an abundance of caution.*

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities. As part of our ongoing commitment to the security of personal information, we continue to implement additional safeguards to further protect the information in our care. We are also contacting the relevant state Attorneys General.



01-02-3-00

As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice, and you can use them at any time during the next 12 months. The cost of this service will be paid for by Michael Saunders. It is incumbent upon you to enroll in these services, as we are not able to act on your behalf to enroll you in the credit monitoring service.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-227-9823 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Credit Monitoring: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. To use this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-855-227-9823 using the following redemption code: Redemption Code.

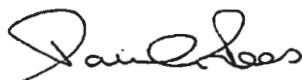
Please note: Additional steps may be required by you in order to activate your phone alerts and monitoring options.

What You Can Do. You can review the enclosed "Steps You Can Take to Prevent Identity Theft and Fraud." You can also enroll to receive the free credit monitoring and identity repair services described above.

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 1-855-227-9823 (toll free), Monday through Saturday, 8:00 a.m. to 8:00 p.m. CST.

Michael Saunders takes the privacy and security of the personal information in our care seriously. We sincerely regret any inconvenience or concern this incident has caused you.

Sincerely,



Paula Rees, V.P. of Operations
Michael Saunders & Company

STEPS YOU CAN TAKE TO PREVENT IDENTITY THEFT AND FRAUD

While we continue to investigate, you may take direct action to further protect against possible identity theft or financial loss.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports and explanation of benefits forms for suspicious activity. 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.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
www.freeze.equifax.com

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

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com



You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can 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. **For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 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 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 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. 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 North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov. **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of 5 Rhode Island residents may be impacted by this incident. 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement.

Michael Saunders & Company.

LICENSED REAL ESTATE BROKER

Processing Center • P.O. BOX 141578 • Austin, TX 78714



01276
TO THE ESTATE OF JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

December 18, 2017

Re: Notice of Data Breach

To the Estate of John Sample:

Michael Saunders & Company (“Michael Saunders”) is writing to inform you of a recent incident that may impact the security of your personal information. We wanted to provide you with notice of this incident, our response, and steps you can take to better protect against fraud, should you feel it necessary to do so.

What Happened? On June 6, 2017, Michael Saunders learned that several employees received emails requesting recipients provide the credentials to their email accounts. Upon discovering that these were phishing emails, we launched an internal investigation to determine the nature and scope of this event. A leading forensic investigation firm was retained to assist with these efforts. On June 30, 2017, the forensic investigator confirmed that one of Michael Saunders’ employees received a phishing email and provided access to their Michael Saunders email account. We conducted a detailed review of the contents of the email account and on November 20, 2017, we confirmed that your information was contained in the compromised email account and may have been accessible to the unauthorized actor.

What Information Was Involved? The investigation has determined your personal information may have been accessible in the compromised email account because of your professional relationship with Michael Saunders & Company. This information may include your name, address, and Social Security number, if contained in the compromised email accounts. *Please note that there is no evidence of the actual or attempted misuse of your information, and we have no evidence that your information was taken. Nonetheless, we are notifying you out of an abundance of caution.*

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities. As part of our ongoing commitment to the security of personal information, we continue to implement additional safeguards to further protect the information in our care. We are also contacting the relevant state Attorneys General.



As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice, and you can use them at any time during the next 12 months. The cost of this service will be paid for by Michael Saunders. It is incumbent upon you to enroll in these services, as we are not able to act on your behalf to enroll you in the credit monitoring service.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-227-9823 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Credit Monitoring: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. To use this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-855-227-9823 using the following redemption code: Redemption Code.

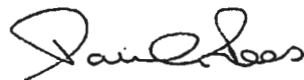
Please note: Additional steps may be required by you in order to activate your phone alerts and monitoring options.

What You Can Do. You can review the enclosed "Steps You Can Take to Prevent Identity Theft and Fraud." You can also enroll to receive the free credit monitoring and identity repair services described above.

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 1-855-227-9823 (toll free), Monday through Saturday, 8:00 a.m. to 8:00 p.m. CST.

Michael Saunders takes the privacy and security of the personal information in our care seriously. We sincerely regret any inconvenience or concern this incident has caused you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paula Rees".

Paula Rees, V.P. of Operations
Michael Saunders & Company

STEPS YOU CAN TAKE TO PREVENT IDENTITY THEFT AND FRAUD

While we continue to investigate, you may take direct action to further protect against possible identity theft or financial loss.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports and explanation of benefits forms for suspicious activity. 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.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
www.freeze.equifax.com

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

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com



You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can 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. **For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 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 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 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. 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 North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov. **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of 5 Rhode Island residents may be impacted by this incident. 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement.