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AUG 28 2019

**BakerHostetler**

CONSUMER PROTECTION

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August 27, 2019

**Via overnight mail**

Attorney General Gordon MacDonald  
New Hampshire 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, Mobius Executive Leadership, LLC (“Mobius”), to notify you of a security incident.

On July 3, 2019, Mobius concluded an investigation involving unauthorized access to an employee’s email account. Upon learning of the incident, Mobius immediately took steps to secure the account, launched an investigation, and a cybersecurity firm was engaged to assist. Mobius’s investigation determined that an unauthorized person accessed the email account at various times between February 4, 2019 and April 23, 2019 and may have accessed or viewed certain emails and attachments in the email account. Mobius conducted a thorough review of the emails and attachments that may have been accessed or viewed, and determined that the emails or attachments contained the name and Social Security number of three (3) New Hampshire residents.

On August 27, 2019, Mobius will mail notification letters to the three New Hampshire residents in accordance with N.H. Rev. Stat. § 359-C:20, via United States First-Class mail, in substantially the same form as the enclosed letter.<sup>1</sup> Notice is being provided to the individuals as soon as possible and without delay. Mobius is offering the New Hampshire residents one year of complimentary credit monitoring, fraud consultation, and identity theft protection service through Kroll. Mobius is also providing a call center for the individuals to call with questions regarding the incident.

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<sup>1</sup> This notice does not waive Mobius’ objection that New Hampshire lacks personal jurisdiction over Mobius related to this incident.

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To help prevent a similar incident from occurring in the future Mobius is re-educating employees regarding phishing emails and enhancing existing security measures, including implementing dual factor authentication.

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

Sincerely,

A handwritten signature in black ink that reads "Laura E. Jehl". The signature is written in a cursive style with a large initial 'L' and 'J'.

Laura E. Jehl  
Partner

Enclosure



August 27, 2019

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED], [REDACTED]

Dear [REDACTED],

At Mobius Executive Leadership ("Mobius") we are committed to protecting the privacy of personal information. We are writing to inform you about an incident involving some of your information. This notice explains the incident, measures we have taken, and steps you can take in response.

We recently concluded an investigation involving unauthorized access to an employee's email account. Upon learning of the incident, we immediately took steps to secure the accounts, launched an investigation, and a cybersecurity firm was engaged to assist. Our investigation determined that an unauthorized person accessed the email account at various times between February 4, 2019 and April 23, 2019 and may have accessed or viewed certain emails and attachments in the email account. We conducted a thorough review of the emails and attachments that may have been accessed or viewed and, on July 3, 2019, determined that the emails or attachments contained some of your personal information, including your name and Social Security number.

As a precaution, we have arranged for Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. For more information on identity theft prevention and Kroll Identity Monitoring, including instructions on how to activate your complimentary one-year membership, please visit the below website.

Visit [krollbreach.idMonitoringService.com](http://krollbreach.idMonitoringService.com) to activate and take advantage of your identity monitoring services.

You have until [REDACTED] to activate your identity monitoring services.

Membership Number: [REDACTED]

We regret this incident occurred and any inconvenience it may cause. We have taken steps at Mobius to help prevent a similar incident from occurring in the future, we are re-educating employees regarding phishing emails and enhancing existing security measures. If you have any questions, please call, 1-866-775-4209 Monday through Friday, from 9:00 a.m. to 6:30 p.m. Eastern Time, or email [DataPrivacy@mobiusleadership.com](mailto:DataPrivacy@mobiusleadership.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Gal Yaguri".

Gal Yaguri  
Director of Operations

## ADDITIONAL STEPS YOU CAN TAKE

Regardless of whether you choose to take advantage of the complimentary credit monitoring, 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:

*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

*Equifax*, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111

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)

**If you are a resident of Maryland or North Carolina**, you may contact and obtain information from your state attorney general at:

*Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 888-743-0023 / (410) 576-6300  
(for calls originating outside Maryland), [www.oag.state.md.us](http://www.oag.state.md.us)

*North Carolina Attorney General's Office*, 9001 Mail Service Center, Raleigh, NC 27699, 919-716-6400 / 1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov)

**If you are a resident of West Virginia**, you have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described below. You also have a right to place a security freeze on your credit report, as described below.

**Fraud Alerts:** There are two types of 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 at least one (1) 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 (7) years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

**Credit 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 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, 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)

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 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 hour 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 hour 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.

## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services<sup>1</sup> from Kroll:

### **Triple Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.