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March 23, 2018

Attorney General Michael A. Delaney
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

RECEIVED

MAR 27 2018

CONSUMER PROTECTION

Re: NWAM, LLC – Incident Notification

Dear Attorney General Delaney:

McDonald Hopkins PLC represents NWAM, LLC dba as Northwest Asset Management, dba RIA Innovations. I write to provide notification concerning an incident that may affect the security of personal information of one (1) New Hampshire resident. NWAM, LLC's investigation of this incident is ongoing and this notification will be supplemented with any new significant facts or findings subsequent to this submission, if any. By providing this notice, NWAM, LLC does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

On January 31, 2018, NWAM, LLC learned that an employee may have been the victim of an email compromise. On February 23, 2018, the extensive forensic investigation concluded that one NWAM, LLC employee email account had been potentially compromised and that an unknown individual may have had access, via that compromised email account, to personal information belonging to current and former clients. The manual document review concluded that the information that was available in the potentially compromised email account included the New Hampshire resident's name, birthdate and social security number.

To date, NWAM, LLC is not aware of any confirmed instances of identity fraud as a direct result of this incident. Nevertheless, NWAM, LLC wanted to make you (and the affected resident) aware of the incident and explain the steps NWAM, LLC is taking to help safeguard the affected resident against identity fraud. NWAM, LLC will provide the affected resident with written notice of this incident commencing on March 23, 2018, in substantially the same form as the letter attached hereto. NWAM, LLC is offering the resident a complimentary membership with a credit monitoring and identity theft protection service. NWAM, LLC will advise the affected resident to remain vigilant in reviewing financial account statements for fraudulent or irregular activity. NWAM, LLC will advise the affected resident about the process for placing a fraud alert and security freeze on their credit files and obtaining a free credit report. The affected resident also will be provided with the contact information for the consumer reporting agencies and the Federal Trade Commission. The resident may contact the toll-free response line with questions regarding the incident.

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NWAM, LLC takes its obligation to help protect personal information very seriously. NWAM, LLC is continually evaluating and modifying its practices to enhance the security and privacy of confidential information, including strengthening its document storage procedures to help prevent similar issues in the future.

Should you have any questions regarding this notification, please contact me at (248) 220-1354 or jgiszczak@mcdonaldhopkins.com.

Sincerely,



James J. Giszczak

Encl.



Return Mail Processing Center
PO Box 6336
Portland, OR 97228-6336

**IMPORTANT INFORMATION
PLEASE REVIEW CAREFULLY**

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

Dear <<Name1>>:

I am writing with important information regarding a recent security incident. The privacy and security of the personal information belonging to our clients is of the utmost importance to NWAM, LLC dba as Northwest Asset Management, dba RIA Innovations. As such, we wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

On January 31, 2018, we learned that an NWAM, LLC employee may have been the victim of an email phishing attack. Upon learning of the issue, we commenced a prompt and thorough investigation. As part of our investigation, we worked very closely with external cybersecurity professionals. The extensive forensic investigation concluded that an NWAM, LLC email account may have been compromised.

What Information Was Involved?

Since completing our investigation and manual document review of the compromised email account, on February 23, 2018, we concluded that because an NWAM, LLC employee's email account may have been compromised, an unknown individual may have had access, via that compromised email account, to personal information belonging to our clients. The information that was available in the potentially compromised email account included your name and Social Security number, and may also include your financial account number, credit card information, driver's license number and/or passport number.

What We Are Doing.

We have no evidence that any of the information has been misused. Nevertheless, out of an abundance of caution, we want to make you aware of the incident.

In addition to alerting you of this incident, and providing you with the enclosed information, we will also be working with your account custodian (*i.e.*, Fidelity, Schwab, TD Ameritrade) to alert them about the situation. Alerting your custodian will allow them to take measures to protect your account from potential fraud or misuse. We recommend that you reach out to your custodian to discuss ways in which you can work together to protect your account, including whether it makes sense to obtain a new account number.

What You Can Do.

To protect you from potential misuse of your information, we are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a Fraud Alert and/or Security Freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

For More Information.

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at 877-646-8164. This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to help protect against potential misuse of your information. The response line is available Monday through Friday, 9:00 a.m. to 9:00 p.m. Eastern Time.

Sincerely,



Nelly Mubashi
Chief Operating Officer

– OTHER IMPORTANT INFORMATION –

1. Enrolling in Complimentary 12-Month Credit Monitoring.

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: <<Enrollment Date>> (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code: <<Enrollment Code>>**

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 877-288-8057. Be prepared to provide engagement number <<Engagement Code>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **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, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877-288-8057 to register with the activation code above.**

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** 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.

2. Placing a Fraud Alert.

Whether or not you choose to use the complimentary 12 month credit monitoring services, we recommend that you place an initial 90-day "Fraud Alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

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

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

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

3. Consider Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "Security Freeze" be placed on your credit file. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by sending a request in writing, by mail, to all three nationwide credit reporting companies. 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
<https://www.freeze.equifax.com>
1-800-685-1111

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

TransUnion Security Freeze
P.O. Box 2000
Chester, PA 19016
<http://www.transunion.com/securityfreeze>
1-888-909-8872

4. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. Additional Helpful Resources.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

For Oregon Residents: You may obtain information about preventing identity theft from the Oregon Attorney General's Office by contacting the Oregon Department of Justice at 1162 Court Street NE, Salem, OR 97301-4096, or by telephone at 877-877-9392, or via the website at www.doj.state.or.us/.