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May 21, 2018

File No. 34181.53

VIA E-MAIL

Gordon MacDonald, Attorney General
Consumer Protection and Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
Email: DOJ-CPB@doj.nh.gov

Re: Notification of Data Security Incident

Dear Attorney General MacDonald:

I represent Pinnacle Advisory Group, Inc. ("Pinnacle"), located in Columbia, Maryland. This letter is being sent pursuant to N.H. Rev. Stat. §§359-C:19-21, because on April 19, 2018, Pinnacle learned that an unauthorized individual may have accessed personal information of certain clients and employees. We believe approximately two (2) residents of New Hampshire may have been affected. The incident may have involved unauthorized access to certain clients' or employees' names, dates of birth, Social Security numbers, Taxpayer Identification numbers, and financial account numbers.

On March 27, 2018, Pinnacle learned that an employee's email account was accessed without authorization. Upon discovering the incident, Pinnacle immediately disabled the unauthorized access, launched an independent investigation and engaged a digital forensics firm to determine what happened and whether personal information was accessed without authorization. On April 19, 2018 the forensics investigation first identified certain affected individuals, and the investigation has continued in the subsequent time in order to identify the full scope of individuals affected. Pinnacle also took additional measures to secure its clients' and employees' personal information and to prevent similar incidents from occurring in the future.

Pinnacle is in the process of notifying the affected New Hampshire residents via the attached letter, and is providing twenty four (24) months of complimentary credit and identity monitoring services to the affected residents through AllClear ID. Please contact me should you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'David Sherman', is written over a light blue horizontal line.

David B. Sherman of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Consumer Notification Letter



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

May 21, 2018

Subject: Notice of Data Breach

Dear John Sample:

At Pinnacle Advisory Group, we recognize that the trust you vest in us to guide you through the financial landscape is earned. We strive to maintain your trust by demonstrating an unflinching commitment to your interests through our every action, particularly during times of challenge. I am writing to inform you that Pinnacle Advisory was recently the victim of a cybersecurity attack that may have involved your personal information. On behalf of the Pinnacle team, I offer our sincere and heartfelt apology. We are committed to making things right. This letter provides information about what happened and what we are doing about it.

What Happened? On March 27, 2018, Pinnacle learned that a Pinnacle employee email account was accessed without authorization. The email account contained messages and attachments that may have included some of your personal information. Upon discovering the incident, we immediately disabled the unauthorized access and took action to secure your personal information. We also launched an investigation, and engaged a digital forensics firm to determine what happened and whether personal information was accessed without authorization. On April 19, 2018 the forensics investigation first identified certain affected individuals, and the investigation continued in the subsequent time in order to identify the full scope of individuals affected.

What Information Was Involved? The following information may have been affected: your name, date of birth, Social Security number or Taxpayer Identification number, and financial account numbers.

What Are We Doing? We took the steps set forth above. Additionally, we implemented a number of internal security features to further safeguard personal information and minimize the likelihood that an event like this could occur in the future. We are also providing you steps you can take to protect your personal information.

As an added precaution, we arranged to have AllClear ID protect your identity for 24 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 24 months.



AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-756-9590 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Fraud Alerts with Credit Monitoring: This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. To enroll in 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 1-855-756-9590 using the following redemption code: Redemption Code.

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

What You Can Do: You can follow the guidelines on the next page to help protect your personal information. You can also contact AllClear ID with any questions and enroll in the free credit and identity theft monitoring services for 24 months at no cost to you by calling 1-855-756-9590 or visiting enroll.allclearid.com and using the redemption code provided in this letter. 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.

If you haven't already done so, it may also be beneficial to complete IRS Form 14039, Identity Theft Affidavit, which you can obtain at <http://www.irs.gov/pub/irs-pdf/f14039.pdf>, and then mail or fax it to the IRS according to instructions on the form. If you have other identity theft/tax related issues, you should contact the IRS Identity Protection Specialized Unit at 1-800-908-4490.

For More Information: Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call AllClear ID at 1-855-756-9590, 9:00 a.m. to 9:00 p.m. Eastern Time, Monday through Saturday. Please have your redemption code ready.

Please accept our sincere apologies and know that we deeply regret any worry or inconvenience this may cause you.

Sincerely,

The Partners of Pinnacle Advisory Group

The Partners of Pinnacle Advisory Group, Inc.

Steps You Can Take to Further Protect Your Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

TransUnion P.O. Box 1000 Chester, PA 19016 1-877-322-8228 www.transunion.com	Experian P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	Equifax P.O. Box 105851 Atlanta, GA 30348 1-800-525-6285 www.equifax.com	Free Annual Report P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 annualcreditreport.com
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Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: In some U.S. states, you have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. If you request a security freeze from a consumer reporting agency there may be a fee up to \$10 to place, lift or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov , and www.ftc.gov/idtheft 1-877-438-4338	Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 oag.state.md.us 1-888-743-0023	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226	Rhode Island Attorney General 150 South Main Street Providence, RI 02903 www.riag.ri.gov 401-274-4400
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You also have certain rights under the Fair Credit Reporting Act (FCRA), including the right to know what is in your file, to dispute incomplete or inaccurate information, and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.



