



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

AUG 23 2019

CONSUMER PROTECTION

Alexander T. Walker
Office: (267) 930-4801
Fax: (267) 930-4771
Email: awalker@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

August 16, 2019

VIA U.S. 1ST CLASS MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

Re: Supplemental Notice of Data Event

Dear Attorney General MacDonald:

We represent Robert Wilson & Company Inc. ("Mr. Wilson") located at 40 Kenoza Avenue, Haverhill, MA 01830. We write to supplement our June 19, 2019 notice to your office, a copy of which is attached as ***Exhibit A***. By providing this notice, Mr. Wilson does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

As indicated in the June 19, 2019 notice, a forensic investigation determined that Mr. Wilson's email account was likely subject to unauthorized logins by an unknown actor. Mr. Wilson is a licensed financial advisor through HD Vest. HD Vest recently provided Mr. Wilson with approval to notify the affected individuals related to HD Vest. Accordingly, eighteen (18) additional New Hampshire residents are being notified of the incident.

Mr. Wilson mailed written notice of this incident to the additional affected New Hampshire residents on August 16, 2019, in substantially the same form as the letter attached hereto as ***Exhibit B***. The personal information found within the impacted email account includes the individuals' name, date of birth, Social Security number, tax identification number, financial account information and brokerage account number.

Mr. Wilson is offering individuals impacted by this event with access to two (2) years of complimentary credit monitoring and identity restoration services. Additionally, Mr. Wilson is providing potentially impacted individuals with guidance on how to better protect against identity

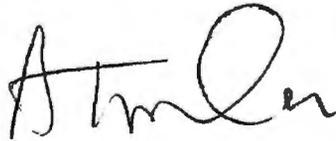
Attorney General Gordon J. MacDonald
August 16, 2019
Page 2

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. In addition to providing this notice to your office, Mr. Wilson is providing notice to other state regulators, as required.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4801.

Very truly yours,

A handwritten signature in black ink, appearing to read "A. Walker", written in a cursive style.

Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW:ncl
Enclosure

EXHIBIT A



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Alexander T. Walker
Office: (267) 930-4801
Fax: (267) 930-4771
Email: awalker@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

June 19, 2019

***INTENDED FOR ADDRESSEE(S) ONLY
VIA U.S. 1st CLASS MAIL***

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

We represent Robert Wilson, & Company Inc. (“Mr. Wilson”) located at 40 Kenoza Avenue, Haverhill, MA 01830. We are writing to notify your office of an incident that may affect the security of some personal information relating to six (6) New Hampshire residents. This notice may be supplemented if significant facts are learned subsequent to its submission. By providing this notice, Mr. Wilson does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about February 8, 2019, Mr. Wilson began receiving reports from some clients that they had received a suspicious email message from him. Mr. Wilson immediately changed his email account password and began an investigation into the incident with assistance from an outside computer forensics expert. As of March 11, the forensic investigator reached the conclusion that due to a lack of logging information, the dates of unauthorized access to the account and what information within the account was viewed or accessed could not be determined. Because of the risk to client information stored in the email account, Mr. Wilson next worked with an outside vendor to perform a thorough and lengthy review of all information stored in the impacted email account to identify potentially impacted clients. Mr. Wilson just recently completed the list of impacted

clients. The information that may have been subject to unauthorized access includes name, address, Social Security number and state identification number.

Notice to New Hampshire Residents

On or about June 19, 2019, Mr. Wilson provided written notice of this incident to potentially impacted clients, which includes six (6) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Mr. Wilson moved quickly to investigate and respond to the incident, assess the security of his email account, and identify and notify potentially affected individuals. Mr. Wilson is providing access to credit monitoring services for twelve (12) months through Experian to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Mr. Wilson is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank, information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4801.

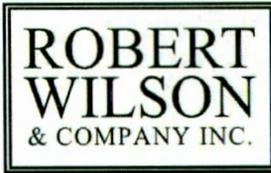
Very truly yours,

A handwritten signature in black ink, appearing to read "Alexander T. Walker". The signature is fluid and cursive, with a large initial "A" and "W".

Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW:ncl
Enclosure

EXHIBIT A



**40 KENOZA AVENUE
HAVERHILL MA 01830**

978.372.3754 info@wilsonplan.com

June 19, 2019

«First_Name» «Last_Name»
«Address_Line_1»
«Address_Line_2»
«City», «State» «Postal_Code»

Re: Notice of Data Security Incident

Dear «First_Name» «Last_Name»:

I am writing to notify you of a recent data security incident that may impact some of your personal information. Please carefully review this letter for information about this incident and my response to it, as well as steps you can take to protect against identity theft and fraud, should you feel you it is appropriate.

What Happened? On or about February 8, 2019, I began receiving reports from some clients that they had received a suspicious email message from me. I immediately changed my email account password and began an investigation into the incident with assistance from an outside computer forensics expert. The investigation determined that my email account was likely subject to unauthorized logins by an unknown actor. However, due to a lack of logging information, I cannot be sure exactly when the unauthorized access to my email account took place. Because of the risk to client information stored in my email account, I next worked with an outside vendor to perform a thorough and lengthy review of all information stored in my impacted email account to identify my potentially impacted clients. I just recently completed the list of impacted clients and provided notice of this incident to them.

What Information Was Involved? The following types of your personal information may have been impacted by this incident: your name«Data_Elements».

What We Are Doing. I take the security of client personal information in my care very seriously and am working to implement additional security safeguards to protect against this type of issue moving forward. As an added precaution, we have arranged to have Experian 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.

Please note that this offer is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located

Robert T. Wilson, Jr., CFP®, EA
CERTIFIED FINANCIAL PLANNER™
Enrolled to practice Before the Internal Revenue Service

at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this website.

While Identity Restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorksSM as a complimentary 12-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

Ensure that you enroll by: September 30, 2019 (Your code will not work after this date.)

Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>

Provide your activation code: «Code».

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

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

You can contact Experian **immediately** regarding any fraud issues and have access to the following features once you enroll in Experian IdentityWorks:

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 file for indicators of fraud.

Identity Restoration: Identity Restoration agents are immediately available to help you address credit and non-credit related 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 Insurance¹: Provides coverage for certain costs and unauthorized electronic fund transfers.

What You Can Do. You can enroll to receive the free credit monitoring and identity restoration services being provided to you. You can also review the enclosed "Steps You Can Take to Protect Against Identity Theft and Fraud."

¹ 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

For More Information. We understand that you may have questions about this incident that may not be addressed in this letter. If you have additional questions, or need assistance, please call 978-372-3754, Monday through Friday, from 9:00 am to 5:00 pm Eastern Time.

We sincerely apologize for this incident and regret any concern or inconvenience this may have caused you.

Sincerely,

A handwritten signature in black ink that reads "Robert Wilson Jr." The signature is written in a cursive style with a large, prominent initial "R" and a long, sweeping underline.

Robert Wilson Jr.

Steps You Can Take to Protect Against Identity Theft and Fraud

The confidentiality, privacy and security of your personal information is one of our highest priorities. That's why we are sharing these steps you can take to protect your identity and uncover any fraudulent activity on your accounts.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports 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.

You have the 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. The security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian PO Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion P.O. Box 2000 Chester, PA 19016 1-888-909-8872 www.transunion.com/credit-freeze	Equifax PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 www.equifax.com/personal/credit-report-services
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In order 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 (5) years, 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, a copy of either the police report, investigative report or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to

take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com/fraud/center.html	TransUnion P.O. Box 2000 Chester, PA 19016 1-800-680-7289 www.transunion.com/fraud-victim-resource/place-fraud-alert	Equifax P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 www.equifax.com/personal/credit-report-services
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You can further educate yourself regarding identity theft, fraud alerts, security freezes and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. 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 report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

EXHIBIT B



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Re: Notice of Data Security Incident

Dear <<Name 1>>:

I am writing to you in my capacity as a licensed financial advisor through HD Vest to notify you about a recent data security incident that may impact some of your personal information. Please carefully review this letter for information about this incident and my response to it, as well as steps you can take to protect against identity theft and fraud, should you feel you it is appropriate.

What Happened? On or about February 8, 2019, I began receiving reports from some clients that they had received a suspicious email message from me. I immediately changed my email account password and began an investigation into the incident with assistance from an outside computer forensics expert. The investigation determined that my email account was likely subject to unauthorized logins by an unknown actor. However, due to a lack of logging information, I cannot be sure exactly when the unauthorized access to my email account took place. Because of the risk to client information stored in my email account, I next worked with an outside vendor to perform a thorough and lengthy review of all information stored in my impacted email account to identify my potentially impacted clients.

What Information Was Involved? The following types of your personal information may have been impacted by this incident: <<data element>>.

What We Are Doing. I take the security of client personal information in my care very seriously and am working to implement additional security safeguards to protect against this type of issue moving forward. As an added precaution, we have arranged to have Experian 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.

Please note that this offer is available to you for 24 months from the date of this letter. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this website.

Robert T. Wilson, Jr., CFP® EA
CERTIFIED FINANCIAL PLANNER®

Securities offered through HD Vest Investment ServicesSM, Member SIPC, Advisory Services offered through HD Vest Advisory ServicesSM

Robert Wilson & Company Inc. is not affiliated with HD Vest Investment ServicesSM and is not a registered broker/dealer

While Identity Restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorksSM as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

Ensure that you enroll by: November 30, 2019 (Your code will not work after this date.)
Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
Provide your activation code: <<Activation Code>>

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

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

You can contact Experian **immediately** regarding any fraud issues and have access to the following features once you enroll in Experian IdentityWorks:

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 file for indicators of fraud.

Identity Restoration: Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.

Experian IdentityWorks ExtendCARETM: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.

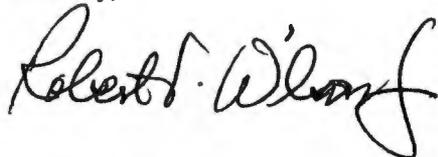
\$1 Million Identity Theft Insurance¹: Provides coverage for certain costs and unauthorized electronic fund transfers.

What You Can Do. You can enroll to receive the free credit monitoring and identity restoration services being provided to you. You can also review the enclosed "Steps You Can Take to Protect Against Identity Theft and Fraud."

For More Information. We understand that you may have questions about this incident that may not be addressed in this letter. If you have additional questions, or need assistance, please call (855) 424-1332, Monday through Friday, from 9:00 am to 9:00 pm Eastern Time.

We sincerely apologize for this incident and regret any concern or inconvenience this may have caused you.

Sincerely,



Robert Wilson Jr.

¹ 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

Robert T. Wilson, Jr., CFP[®], EA
CERTIFIED FINANCIAL PLANNERSM

Securities offered through HD Vest Investment ServicesSM, Member.SIPC, Advisory Services offered through HD Vest Advisory ServicesSM

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Steps You Can Take to Protect Against Identity Theft and Fraud

The confidentiality, privacy and security of your personal information is one of our highest priorities. That's why we are sharing these steps you can take to protect your identity and uncover any fraudulent activity on your accounts.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports 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.

You have the 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. The security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian
PO Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

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

www.transunion.com/credit-freeze

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

www.equifax.com/personal/credit-report-services

In order 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 (5) years, 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, a copy of either the police report, investigative report or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Robert T. Wilson, Jr., CFP® EA
CERTIFIED FINANCIAL PLANNER™

Securities offered through HD Vest Investment ServicesSM, Member:SIPC, Advisory Services offered through HD Vest Advisory ServicesSM

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

www.experian.com/fraud/center.html

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

www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008

www.equifax.com/personal/credit-report-services

You can further educate yourself regarding identity theft, fraud alerts, security freezes and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. 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 report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

Robert T. Wilson, Jr., CFP®, EA
CERTIFIED FINANCIAL PLANNER™

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