

**BakerHostetler**

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JUL 29 2019

CONSUMER PROTECTION

**Baker&Hostetler LLP**

999 Third Avenue  
Suite 3600  
Seattle, WA 98104-4040

T 206.332.1380  
F 206.624.7317  
www.bakerlaw.com

Andreas T. Kaltsounis  
direct dial: 206.566.7080  
akaltsounis@bakerlaw.com

July 26, 2019

**Via overnight mail**

Attorney General Gordon MacDonald  
New Hampshire Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

*Re: Security Incident*

Dear Attorney General MacDonald:

We are writing on behalf of our client, Sage Financial Group (“Sage”), to notify you of a security incident involving two New Hampshire residents.

Sage is a financial advisor located in West Conshohocken, Pennsylvania. Between May 11 and May 15, 2019, an unauthorized actor may have remotely accessed information in a single Sage employee email account. When Sage detected the unauthorized access, it secured the affected account and began an investigation with the assistance of a leading cybersecurity firm.

After an extensive investigation requiring a review of access logs and a comprehensive manual review of emails and attachments for personal information, Sage determined on June 26, 2019 that the account accessed by the unauthorized actor contained personal information, including the personal information of the New Hampshire residents. The personal information in the affected account may have included names, Social Security numbers, driver’s license numbers, financial account numbers, and usernames and passwords.

Beginning today, Sage is providing notice via postal mail to the affected individuals in substantially the same form as the enclosed letter.<sup>1</sup> To help monitor for any potential misuse of their personal information, Sage is offering the potentially-affected New Hampshire residents a complimentary one-year membership in credit monitoring and identity theft protection services through Experian. The notice provides a phone number that customers can call with any questions they may have about the incident. Sage is also recommending that potentially affected individuals

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<sup>1</sup> This notice does not waive Sage’s objection that New Hampshire lacks personal jurisdiction over it regarding any claims related to this incident.

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remain vigilant regarding the possibility of fraud by reviewing their account statements and credit reports for any unauthorized activity.

Sage has implemented additional safeguards and technical security measures to further protect personal information.

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

Sincerely,



Andreas T. Kaltsounis  
Partner

Enclosure



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

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

<<Date>>

Dear <<Salutation>>:

Sage Financial Group understands the importance of protecting our clients' personal information. We are writing to inform you of a recent security incident that may have involved some of your information. This notice explains the incident, measures we have taken, and some steps you can take in response.

We recently conducted an investigation into an email phishing campaign that targeted some of our employees. Upon learning of the incident, we promptly secured the account, and a leading cybersecurity firm was retained to assist with the investigation. Our investigation determined that an unauthorized actor accessed one employee email account between May 11 and May 15, 2019, but the investigation was not able to determine which emails or attachments the unauthorized actor may have viewed. We conducted a thorough review of the entire mailbox contents. On June 26, 2019, that review identified a list of individuals whose information was present in the account. We then reviewed this list for personal information and determined on July 8, 2019 that an email or attachment in the account contained your <<variable data>>. Since July 8, 2019, we have worked diligently with outside counsel to ensure that potentially-affected individuals receive timely and accurate notice of this incident.

Although, to date, we have no evidence that your information has been misused, we assure you that we take this incident very seriously. We encourage you to remain vigilant by reviewing your account statements and credit reports for any unauthorized activity. As a precaution, we are offering, and strongly recommending that you take advantage of, a complimentary one-year membership in Experian's® IdentityWorks<sup>SM</sup> 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 will be completely free to you and enrolling in this program will not hurt your credit score. For more information on IdentityWorks Credit 3B, including instructions on how to activate your complimentary membership as well as some additional steps you can take to help protect yourself, please see the additional information provided with this letter.

We sincerely regret any inconvenience caused by this incident. We have implemented additional safeguards and technical security measures to further protect personal information. If you have any questions, please call Sage at 484-342-4400.

Sincerely,

Alan J. Cohn, CFP®  
Co-Founder, Co-President

Stephen L. Cohn, CFP®  
Co-Founder, Co-President

John J. Sion, CFP®  
Chief Compliance Officer

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorks<sup>SM</sup> 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: **[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**: **[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 877-890-9332. Be prepared to provide engagement number **[Engagement #]** as proof of eligibility for the identity restoration services by Experian.

### ADDITIONAL DETAILS REGARDING YOUR 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 ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcredit>  
or call 877-890-9332 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](http://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 877-890-9332.

\* 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.



## ADDITIONAL STEPS YOU CAN TAKE

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:

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

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, 1-888-743-0023 / 1-410-576-6300, [www.oag.state.md.us](http://www.oag.state.md.us)
- *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6400 / 1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov)

**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 one 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 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 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 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 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 remove the security freeze.