

STATE OF NH  
DEPT. OF JUSTICE  
2016 JUN 13 AM 11:31

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Attorney General Joseph Foster  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

RE: Santa Rosa Consulting Inc.

Dear Attorney General Foster:

Pursuant to N.H. Rev. Stat. 539-C-19 et seq., we are writing to notify you of unintentional disclosure of personal information involving one New Hampshire resident.

**NATURE OF THE SECURITY BREACH OR UNAUTHORIZED USE OR ACCESS**

We write to inform you that Santa Rosa Consulting has been the targeted victim of an email spoofing attack and that personal information contained on Internal Revenue Service (IRS) Tax Form W-2 has been disclosed as a result of this incident. IRS Tax Form W-2 includes the following categories of information: (1) the employee's name, (2) the employee's address, (3) the employee's Social Security number, and (4) the employee's wage information. At this time, Santa Rosa Consulting does not have any evidence that this information has been misused.

Specifically, on May 8, 2016, a Santa Rosa Consulting employee received a request for all 2015 employees' W-2 information. This information was provided prior to the discovery that the request had been made from a fraudulent account by an individual purporting to be Santa Rosa Consulting's CEO.

**NUMBER OF STATE RESIDENTS AFFECTED**

This IRS Tax Form W-2 phishing scheme affected one individual residing in New Hampshire. We have secured the services of Kroll to provide employees with written notice pursuant to state law, access to a call center to address questions and gain further information, and two years of identity monitoring services all at no charge. This notification was sent to all affected employees on May 27, 2016.

**STEPS TAKEN OR PLAN TO TAKE RELATING TO THE INCIDENT**

On May 8, 2016, it was discovered that IRS Tax Form W-2 information had been unintentionally disclosed in response to an email spear phishing attack. The following day, May 9, 2016, Santa

June 9, 2016

Rosa Consulting notified its cybersecurity counsel, Butzel Long, regarding the event. An independent forensic analysis concluded that the event was limited to the disclosure of IRS Tax Form W-2 in response to the phishing attack.

**OTHER NOTIFICATION AND CONTACT INFORMATION**

In addition to notice to your office, we have provided notice to other states' officials if required by those states' laws.

If you require additional information, please contact me at:

Claudia Rast  
Butzel Long  
301 E. Liberty, Suite 500  
Ann Arbor Michigan 48104  
Office: 734.995.3110  
[Rast@butzel.com](mailto:Rast@butzel.com)

Sincerely,

BUTZEL LONG, a professional corporation



Claudia Rast

CR/jad



<<MemberFirstName>> <<MemberLastName>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip Code>>

<<Date>> (Format: Month Day, Year)

### Notice of Data Breach

Dear <<MemberFirstName>> <<MemberLastName>>,

We are writing to notify you of a data security incident that may have exposed some of your personal information. Although we have no evidence that your personal information was misused in any manner, we are taking precautionary measures to safeguard your financial security and help alleviate concerns.

#### What happened?

The company was the target of a third-party fraudulent phishing scheme. On May 8, 2016, W2 information of our employees, intended for company officers entitled to receive such information, was unknowingly diverted to an unidentified third-party.

#### What information was involved?

This information includes names, addresses and Social Security numbers.

#### What we are doing.

We take the protection and proper use of your information very seriously and have engaged appropriate experts to assist us in conducting a review of our security practices.

We have also secured the services of **Kroll** to provide you with identity monitoring services at no charge for two years. 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 Triple Bureau Credit Monitoring, a Current Credit Report, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Theft Insurance, Identity Consultation, and Identity Restoration.

#### How do I enroll in the free services?

Visit <<IDMonitoringURL>> to enroll and take advantage of your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-844-263-8605. Additional information describing your services is included with this letter.

#### What you can do.

Please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

**For more information.**

If you have questions, please call a Kroll representative at 1-866-775-4209, Monday through Friday from 8:00 a.m. to 5:00 p.m. Central Time. Please have your membership number ready.

Protecting your information is important to us. We hope that the services we are offering to you demonstrate our continued commitment to your security and satisfaction.

Sincerely,

Tom Watford  
President

## ADDITIONAL RESOURCES

### Contact information for the three nationwide credit reporting agencies is:

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

**Experian**, PO Box 2104, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742

**TransUnion**, PO Box 2000, Chester, PA 19022, [www.transunion.com](http://www.transunion.com), 1-800-888-4213

**Free Credit Report.** It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit report for 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 agencies.

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**.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

### **For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:**

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**Fraud Alert.** You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. A fraud alert tells creditors to follow certain procedures, including contacting you before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit.

**Security Freeze.** You have the ability to place a security freeze on your credit report.

A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. The credit reporting agencies may charge a fee to place a freeze, temporarily lift it or permanently remove it. The fee is waived if you are a victim of identity theft and have submitted a valid investigative or law enforcement report or complaint relating to the identity theft incident to the credit reporting agencies. (You must review your state's requirement(s) and/or credit bureau requirement(s) for the specific document(s) to be submitted.)

**For Massachusetts residents:** The fee for each placement of a freeze, temporary lift of a freeze, or removal of a freeze is \$5.

**Federal Trade Commission and State Attorneys General Offices.** 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 home state. You may also contact these agencies for information on how to prevent or avoid identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**For Maryland residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-743-0023.

**For North Carolina residents:** You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.com](http://www.ncdoj.com), 1-877-566-7226.

### **Reporting of identity theft and obtaining a police report.**

**For Iowa residents:** You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

**For Massachusetts residents:** You have the right to obtain a police report if you are a victim of identity theft.

**For Oregon residents:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.



## 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 and a TransUnion Credit Report.**

You'll receive alerts when there are changes to your credit data—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 investigator, who can help you determine if it's an indicator of identity theft.

### **Web Watcher**

Web Watcher monitors internet sites where criminals buy, sell, and trade personal information. You'll be promptly notified if evidence of your identity information being traded or sold is discovered.

### **Public Persona**

Public Persona monitors public record databases for names, aliases, and addresses that are associated with your Social Security number. If information is found, an alert email is sent.

### **Quick Cash Scan**

Quick Cash Scan monitors thousands of short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll investigator for more information.

### **\$1 Million Identity Theft Insurance**

Reimburses you for out-of-pocket expenses totaling up to \$1 million in legal costs for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

### **Identity Consultation**

You have unlimited access to consultation with a dedicated licensed investigator at Kroll. 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 Restoration**

If you become a victim of identity theft, an experienced licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and will do most of the work for you. Your investigator can dig deep to uncover all aspects 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 Internet Explorer, Chrome, Firefox, and Safari.

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.