



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

November 21, 2023

VIA E-MAIL

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Sarah D. Culbertson Memorial Hospital (“Culbertson”) located at 238 S Congress St, Rushville, IL 62681, and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) New Hampshire residents. This notice may be supplemented with new significant facts learned subsequent to its submission. By providing this notice, Culbertson 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 March 30, 2023, Culbertson became aware of suspicious activity related to certain computer systems. Culbertson immediately launched an investigation, with the assistance of third-party forensic specialists, to secure its network and determine the nature and scope of the activity. The investigation determined that there was unauthorized access to Culbertson’s network between March 27, 2023, and March 30, 2023, and the unauthorized actor had the ability to acquire certain information stored on the network during the period of access. Therefore, Culbertson conducted a comprehensive review of the data determined to be at risk to assess what sensitive information was contained therein and to whom the information relates. On September 25, 2023, Culbertson determined that information related to certain individuals could be impacted. The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

In an effort to notify potentially affected individuals as soon as possible while the investigation was ongoing, Culbertson placed notice of the event on the homepage of its website on May 8, 2023, and published a media notice throughout the communities it serves in Illinois on May 10, 2023. On November 21, 2023, Culbertson provided written notice of this incident to two (2) 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, Culbertson moved quickly to investigate and respond to the incident, assess the security of its systems, and identify potentially affected individuals. Further, Culbertson notified federal law enforcement regarding the event and implemented additional safeguards and training to its employees. Culbertson is providing individuals whose social security number was potentially impacted by this event access to credit monitoring services for _____ through IDX at no cost to the individuals.

Additionally, Culbertson is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Culbertson is providing individuals with 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.

Culbertson is providing written notice of this incident to state and federal regulators, as necessary, and to the three major consumer credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at _____.

Very truly yours,

Colin D. Scanlon of
MULLEN COUGHLIN LLC

CDS:scs
Enclosure

EXHIBIT A



P.O. Box 989728
West Sacramento, CA 95798-9728

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

November 21, 2023

NOTICE OF <<Variable Data 3>>

Dear <<First Name>> <<Last Name>>:

Sarah D. Culbertson Memorial Hospital (“Culbertson”) writes to notify you of an incident that may affect the privacy of some of your information. This letter provides details of the incident, our response, and steps you may take to better protect against the possible misuse of your information should you feel it is appropriate to do so.

What Happened? On March 30, 2023, Culbertson became aware of suspicious activity related to certain computer systems. We immediately launched an investigation, with the assistance of third-party forensic specialists, to secure our network and determine the nature and scope of the activity. The investigation determined that there was unauthorized access to our network between March 27, 2023, and March 30, 2023, and the unauthorized actor had the ability to acquire certain information stored on the network during the period of access. Therefore, we conducted a comprehensive review of the data determined to be at risk to assess what sensitive information was contained therein and to whom the information relates. On September 25, 2023, we completed this review and determined that information related to you could be impacted.

What Information Was Involved? We determined the type of information potentially impacted by this incident includes your: <<Variable Data 1>>.

What We Are Doing. We take the confidentiality, privacy, and security of information in our care seriously. Upon discovery of the incident, we immediately commenced an investigation and took steps to implement additional safeguards related to data privacy and security.

In an abundance of caution, we are providing you with access to <<# of Months>> months of credit monitoring and identity protection services through IDX at no cost to you. A description of the services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Protect Personal Information*. Please note that you must complete the enrollment process yourself as we are not permitted to enroll you in these services.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Personal Information* for general guidance. In addition, you can enroll in the complimentary credit monitoring and identity protection services being offered through IDX. We also 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.

For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have questions, or need assistance, please go to <https://response.idx.us/SCMH> or call our dedicated assistance line at (888) 996-4056, Monday through Friday from 8:00 a.m. to 8:00 p.m. Central Time. You may also write to us at 238 S Congress St, Rushville, IL 62681.

Sincerely,

Gregg Snyder
CEO
Sarah D. Culbertson Memorial Hospital

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

1. Website and Enrollment. Scan the QR image or go to <https://response.idx.us/SCMH> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is February 21, 2024.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit 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 credit 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 credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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 also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 1 Rhode Island resident that may be impacted by this event.