



LEWIS BRISBOIS BISGAARD & SMITH LLP

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October 11, 2019

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: Notice of Data Security Incident

Dear Attorney General MacDonald:

We represent South Pacific Financial Corporation ("SPFC"), a mortgage bank located in Irvine, California, which recently changed its name to ClosingMark Home Loans. This letter is being sent pursuant to N.H. Rev. Stat. §§ 359-C:19-21, because the personal information of three (3) New Hampshire residents may have been affected by a recent data security incident. The incident may have involved unauthorized access to names, Social Security numbers, and financial account information.

On June 13, 2019, SPFC discovered unusual activity in its email system. SPFC immediately took measures to secure its system and launched an investigation with the assistance of a digital forensics firm to help determine what occurred and whether personal information was accessed without authorization. The incident was also reported to law enforcement. On June 21, 2019, the forensics investigation determined that information contained within two SPFC employee email accounts may have been accessed without authorization. In response, SPFC launched a data review project to identify whether personal information within those two accounts may have been accessed without authorization. On September 9, 2019, SPFC confirmed that the personal information three (3) New Hampshire residents may have accessed without authorization.

SPFC notified the affected New Hampshire residents via the attached sample letter on October 11, 2019. SPFC is offering twelve (12) months of complimentary credit and identity monitoring services to the affected residents through Kroll, including Credit Monitoring, Web Watcher, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration. Please contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Sean B. Hoar'.

Sean B. Hoar of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Consumer Notification Letter



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

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Notice of Data Security Incident

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

We are writing to inform you of a data security incident that may have involved some of your personal information. As explained below, we recently learned that there was unauthorized access to a couple of employee email accounts containing your information. We wanted to notify you of the incident, offer you identity monitoring services, and inform you about steps that can be taken to help protect your personal information.

What Happened. In June of 2019, we discovered unusual activity in an employee's email account. We immediately took steps to secure the account and launched an investigation to determine whether additional email accounts were involved and whether any personal information had been accessed without authorization. We also engaged an independent digital forensics firm to assist with this investigation. On September 9, 2019, our investigation determined that your information may have been accessed without authorization. Please note that this incident was limited to information transmitted via email and did not affect any other information systems.

What Information Was Involved. The information may have included your <<ClientDef1(Impacted Data)>>.

What We Are Doing. As soon as we discovered the incident, we took the steps referenced above and implemented enhanced security measures in our employee email platform to better safeguard personal information in our possession. We also reported the matter to the FBI and will provide whatever cooperation is necessary to hold the perpetrators accountable. Additionally, we are offering you complimentary identity monitoring services through Kroll, a global leader in risk mitigation and response. Your complimentary services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

What You Can Do. We recommend that you activate your Kroll identity monitoring. Activation instructions and a description of the services are included with this letter. Kroll representatives have been fully versed on the incident and can answer any questions and concerns you may have regarding protection of your personal information. We also recommend that you review the guidance on the next page about how to help protect your personal information.

For More Information. If you have questions or need assistance, please contact 1-866-775-4209, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding major US holidays. Please have your membership number ready.

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

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Johnston", with a long horizontal flourish extending to the right.

John A. Johnston
President
South Pacific Financial Corporation

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 one year. 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: 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. There is no charge 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 http://www.riag.ri.gov 401-274-4400
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You also have certain rights under the Fair Credit Reporting Act (FCRA), including: to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information, as well as others. 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.



A Division of
DUFF & PHELPS

As referenced above, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. 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 Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit krollbreach.idMonitoringService.com to activate and take advantage of your identity monitoring services.

*You have until **January 9, 2020** to activate your identity monitoring services.*

Membership Number: <<Member ID>>

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ from Kroll:

Single Bureau Credit Monitoring

You will 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 fraud specialist, who can help you determine if it's an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you'll receive an alert.

Quick Cash Scan

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

\$1 Million Identity Fraud Loss Reimbursement

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

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. 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 Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

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.