



January 9, 2024

**VIA EMAIL**

Attorney General John Formella  
Office of the Attorney General  
Consumer Protection Bureau  
33 Capitol Street  
Concord, NH 03301

Re: Notice of Data Security Incident

Dear Attorney General Formella:

Constangy, Brooks, Smith and Prophete LLP (“Constangy”) represents TBM Consulting Group, Inc. (“TBM”) located in Morrisville, N.C. in connection with an incident described in greater detail below.

**1. Nature of Incident**

On December 3, 2023, TBM experienced an IT outage that disrupted access to certain local systems. After detecting and promptly containing the incident, TBM launched an investigation with the support of external cybersecurity experts to learn more about the scope of the incident and any impact to data. Through that investigation, TBM learned of information suggesting that an unknown actor gained unauthorized access to its network between December 1 and December 3, 2023 and potentially acquired certain files, some of which may have contained personal information of its employees. On or about December 19, 2023, TBM completed its review of the impacted information. TBM then took steps to obtain addresses for those individuals whose information was involved.

The potentially affected information varied by individual but may include the following: individuals’

**2. Number of New Hampshire residents affected**

TBM notified one (1) New Hampshire residents of the incident via first class U.S. mail on December 27, 2023. A sample copy of the notification letter is included with this correspondence.

### **3. Steps taken relating to the incident**

Upon discovering the issue, TBM took the steps described above. TBM also provided notice of the incident to potentially impacted individuals on December 27, 2023. In addition, TBM is offering affected individuals, whose social security numbers were impacted, complimentary credit monitoring and identity protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. These services include 12 months of credit monitoring, identity protection, and fully managed identity theft recovery services. With this protection, IDX will help them resolve issues if their identity is affected.

### **4. Contact information**

If you have any questions or need additional information, please do not hesitate to contact me at

Very truly yours,

Lauren Godfrey, Esq.

Encl.: Sample Consumer Notification Letter



**TBM**

4145 SW Watson Avenue  
Suite 400  
Beaverton, OR 97005

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

December 27, 2023

Subject: Notice of Data <<Variable Text 1: Security Incident/Breach>>

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

TBM Consulting Group, Inc. (“TBM”), a global operations and supply chain consulting firm, is writing to inform you of a recent data security incident involving your personal information. At TBM, we take the privacy and security of personal information very seriously. Please read this letter carefully as it contains information regarding the incident and steps you can take to help protect your personal information.

**What Happened.** On December 3, 2023, TBM experienced a network disruption and immediately initiated an investigation of the matter. We engaged cybersecurity experts to assist with the process. The investigation revealed that an unauthorized actor had access to certain files from the TBM network on or about December 3, 2023. On December 6, 2023, TBM determined that certain personal data stored in the network environment, including your data, was exposed to the unauthorized actor while they were in the network environment.

**What Information Was Involved.** The impacted information included your

**What We Are Doing.** As soon as we discovered the incident, we took the steps described above and implemented additional security measures to minimize the risk of a similar incident occurring in the future. We have reported this incident to federal law enforcement and will cooperate with any investigative requests. We are further notifying you of this event and advising you about steps you can take to help protect your information.

In addition, we are offering you the opportunity to enroll in complimentary identity protection services through IDX, a data breach and recovery services expert. These services include <<12/24>> months of credit monitoring and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

**What You Can Do.** You can follow the recommendations on the following page to help protect your information. You can also enroll in the complementary services offered to you through IDX identity protection services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time. You will need to reference the enrollment code in this letter when calling or enrolling online, so please do not discard this letter. Please note the deadline to

**For More Information:** Further information about how to help protect your information appears on the following page. If you need assistance enrolling in the complimentary services being offered to you, please call IDX at 1-800-939-4170 from 9:00 A.M. to 9:00 P.M. Eastern Time, Monday through Friday (excluding holidays). IDX representatives can also answer questions you may have regarding the incident and the protection of your personal information.

We take this event and the security of information in our care seriously. Please accept our sincere apologies and know that we deeply regret any concern or inconvenience that this may cause you.

Sincerely,

Michael Hunt  
Chief Information Officer  
TBM Consulting Group, Inc.  
507 Airport Blvd., Suite 105  
Morrisville, NC 27560

## 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 1-877-322-8228, 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 also can contact one of the following three national credit reporting agencies:

**Equifax**

P.O. Box 105851  
Atlanta, GA 30348  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)

**Experian**

P.O. Box 9532  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

**TransUnion**

P.O. Box 1000  
Chester, PA 19016  
1-800-916-8800  
[www.transunion.com](http://www.transunion.com)

**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 at least 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 for up to one year at no cost. 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. 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 fraud alerts, security freezes, and 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.

**Federal Trade Commission**

600 Pennsylvania Ave, NW  
Washington, DC 20580  
[consumer.ftc.gov](http://consumer.ftc.gov), and  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

**Maryland Attorney General**

200 St. Paul Place  
Baltimore, MD 21202  
[oag.state.md.us](http://oag.state.md.us)  
1-888-743-0023

**New York Attorney General**

Bureau of Internet and Technology  
Resources  
28 Liberty Street  
New York, NY 10005  
1-212-416-8433

**North Carolina Attorney General**

9001 Mail Service Center  
Raleigh, NC 27699  
[ncdoj.gov](http://ncdoj.gov)  
1-877-566-7226

**Rhode Island Attorney General**

150 South Main Street  
Providence, RI 02903  
<http://www.riag.ri.gov>  
1-401-274-4400

**Washington D.C. Attorney General**

441 4th Street, NW  
Washington, DC 20001  
[oag.dc.gov](http://oag.dc.gov)  
1-202-727-3400

**You also have certain rights under the Fair Credit Reporting Act (FCRA):** These rights include 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 other rights. For more information about the FCRA, and

your rights pursuant to the FCRA, please visit <https://www.consumer.ftc.gov/sites/default/files/articles/pdf-0096-fair-credit-reporting-act.pdf>.