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ATTORNEYS AT LAW

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MAY 26 2020

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302  
Wayne, PA 19087

May 22, 2020

**VIA U.S. MAIL**

Consumer Protection Bureau  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent TRH Financial LLC d/b/a Hawkins Wealth Management (“HWM”) located at 1210 Jordan Street, Suite 3, North Liberty, IA 52317 and we write to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, HWM 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 January 22, 2020, HWM became aware of suspicious activity related to a HWM email account. Upon discovery, HWM immediately launched an investigation, with the aid of forensic investigators, to determine the nature and scope of the activity. On January 31, 2020, HWM’s investigation determined that there was unauthorized access to the affected HWM email account on January 21 and 22, 2020. HWM began reviewing the affected email account to determine what, if any, sensitive information it contained. On March 27, 2020, this review determined that the email account contained sensitive information related certain individuals. Although HWM has no evidence of actual access or misuse of information as a result of this incident, HWM is notifying individuals potentially affected, in an abundance of caution.

The information that could have been subject to unauthorized access includes name, address, and Social Security number.

[Mullen.law](http://Mullen.law)

### **Notice to New Hampshire Resident**

On or about May 22, 2020, HWM provided written notice of this incident to all affected individuals, which includes one (1) New Hampshire resident. 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, HWM moved quickly to investigate and respond to the incident, assess the security of HWM systems, and notify potentially affected individuals. HWM is also working to implement additional safeguards and training to its employees. HWM is providing access to credit monitoring services for twelve (12) months, through ID Experts, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, HWM is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. HWM is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4775.

Very truly yours,



Christopher J. DiLenno of  
MULLEN COUGHLIN LLC

CJD/rab

# EXHIBIT A



C/O ID Experts  
10300 SW Greenburg Rd., Suite 570  
Portland, OR 97223

To Enroll, Please Call:  
1-800-939-4170  
Or Visit:  
<https://app.myidcare.com/account-creation/protect>  
Enrollment Code: <<XXXXXXXXXX>>

<<First Name>><<Last Name>>  
<<Address>>  
<<City>>, <<State>> <<Zip Code>>

May 20, 2020

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

Hawkins Wealth Management (“HWM”) is writing to notify you of an incident that may affect the privacy of some of your information. We take this incident very seriously, and this letter provides details of the incident, our response, and steps you may take to better protect against possible misuse of your personal information, should you feel it appropriate to do so.

**What Happened?** On January 22, 2020, HWM became aware of suspicious activity related to a HWM email account. Upon discovery, HWM immediately launched an investigation, with the aid of expert third-party forensic investigators, to determine the nature and scope of the activity. On January 31, 2020, HWM’s investigation confirmed unauthorized access to the affected HWM email account on January 21, 2020 and January 22, 2020. HWM began reviewing the affected email account to determine what sensitive information it contained. This review determined that the email account contained certain information related to you. Although HWM has seen no evidence to date of actual access or misuse of information as a result of this incident, HWM is notifying you in an abundance of caution because we have confirmed that certain information relating to you was present in the affected email account.

**What Information Was Involved?** HWM determined that the following information related to you was present in the affected email account at the time of this incident: name, address, [Variable Data].

**What is HWM Doing?** HWM takes the confidentiality, privacy, and security of information in our care seriously. Upon discovery, we immediately commenced an investigation to confirm the nature and scope of the incident. We are taking steps to implement additional safeguards and review policies and procedures relating to data privacy and security. We are also notifying certain state regulators of the incident as required.

While we have no evidence of actual access or misuse of your personal information, HWM is providing you with access to twelve (12) months of credit monitoring and identity protection services through ID Experts at no cost to you. A description of services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services on your behalf.

**What You Can Do.** You can review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*. You can also enroll to receive the complimentary credit monitoring and identity protection services through ID Experts. 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 this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please call our call center at 1-800-939-4170, from Monday to Friday, 9 a.m. to 9 p.m. Eastern Standard Time.

HWM takes the privacy and security of personal information in our care seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Hawkins". The signature is fluid and cursive, with a large initial "T" and a stylized "H".

Timothy R. Hawkins  
Chief Executive Officer  
Hawkins Wealth Management

## STEPS YOU CAN TAKE TO PROTECT AGAINST IDENTIFY THEFT AND FRAUD

### **Enroll in Credit Monitoring**

As an added precaution, we are offering identity theft protection services through ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: 12 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

**1. Website and Enrollment.** Go to <https://app.myidcare.com/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. The deadline to enroll in free MyIDCare services is August 20, 2020.

**2. Activate the credit monitoring** provided as part of your MyIDCare 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, MyIDCare will be able to assist you.

**3. Telephone.** Contact MyIDCare at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

### **Monitor Your Accounts**

In addition to enrolling in the complimentary services detailed above, we 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. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

**Experian**  
PO Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/  
center.html](http://www.experian.com/freeze/center.html)

**TransUnion**  
P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872  
[www.transunion.com/credit-  
freeze](http://www.transunion.com/credit-freeze)

**Equifax**  
PO Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111  
[www.equifax.com/personal/  
credit-report-services](http://www.equifax.com/personal/credit-report-services)

In order 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 (5) 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.); and
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your 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 agencies listed below:

**Experian**  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/fraud/  
center.html](http://www.experian.com/fraud/center.html)

**TransUnion**  
P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289  
[www.transunion.com/fraud-  
victim-resource/place-fraud-  
alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

**Equifax**  
P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008  
[www.equifax.com/personal/  
credit-report-services](http://www.equifax.com/personal/credit-report-services)

### **Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, [www.identitytheft.gov](http://www.identitytheft.gov), 1-877-ID-THEFT (1-877-438-4338); 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 Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, [www.oag.state.md.us](http://www.oag.state.md.us).

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

**For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, [www.ncdoj.gov](http://www.ncdoj.gov).

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