



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

APR 27 2021

CONSUMER PROTECTION

Jeffrey J. Boogay
Office: (267) 930-4784
Fax: (267) 930-4771
Email: jboogay@mullen.law

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

April 23, 2021

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 Veris Wealth Partners (“Veris”) located at 17 State Street, Suite 2450, New York, NY 10004, and are writing to notify your office of an incident that may affect the security of some personal information relating to twenty-six (26) New Hampshire residents. 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, Veris 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 or about February 3, 2021, Veris learned of unusual activity in an employee’s e-mail account. In response, Veris immediately secured the mailbox and launched an investigation. The investigation determined that there was unauthorized access by an unknown individual to the employee’s e-mail account between December 30, 2020 and February 3, 2021.

Veris, with the assistance of the forensic specialists, undertook an in-depth, lengthy, and labor-intensive process to identify whether sensitive information may have been contained within the accessed e-mail account, and identify the individuals whose information may have been impacted. This review completed on March 25, 2021 and Veris immediately began reviewing its internal records to identify address information for impacted individuals.

The information that could have been subject to unauthorized access includes name, address, financial account information, date of birth, and email log-in and password.

Notice to New Hampshire Residents

On or about April 23, 2021, Veris provided written notice of this incident to all affected individuals, which includes twenty-six (26) 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, Veris moved quickly to investigate and respond to the incident, assess the security of Veris systems, and notify potentially affected individuals. Veris is also working to implement additional safeguards and training to its employees. Veris is providing access to credit monitoring services for one (1) year, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Veris 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. Veris 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4784.

Very truly yours,



Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

EXHIBIT A



VERIS

Wealth
Partners

Values. Wealth. Sustainability.

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

To Enroll, Please Call:
1-800-939-4170
Or Visit:
[https://app.idx.us/account-
creation/protect](https://app.idx.us/account-creation/protect)
Enrollment Code: <<XXXXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address 1>> <<Address 2>>
<<City>>, <<State>> <<Zip>>

April 23, 2021

<<Variable Text 1>>

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

Veris Wealth Partners (“Veris”) is writing to inform you, out of caution, of a recent incident that involved some of your personal information. We want to provide you with an overview of the incident, our response thus far, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it necessary. If you received notification from us in February, this is not notice of a new event. Our forensic investigation into this incident continued since our last communication as detailed below. While we do not currently have any reason to believe that any identity theft has occurred, we nonetheless want to keep you informed.

What Happened? On February 3, 2021, Veris became aware of unusual activity in an employee’s e-mail account. In response, Veris immediately secured the mailbox, and began working with a third-party forensic specialist firm to investigate the nature and scope of the incident. The investigation determined that there was unauthorized access by an unknown individual to the employee’s e-mail account between December 30, 2020 and February 3, 2021. However, the forensic investigation was unable to determine whether any specific emails within the account were viewed.

Veris, with the assistance of the forensic specialists, undertook an in-depth, lengthy, and labor-intensive process to identify whether sensitive information may have been contained within the accessed e-mail account, and identify the individuals whose information may have been impacted. This review completed on March 25, 2021 and Veris immediately began reviewing its internal records to identify address information for impacted individuals. Veris is notifying you out of an abundance of caution because the investigation determined that certain information relating to you may have been included in the impacted files.

What Information Was Involved? The following information about you was present within the impacted employee’s email account: your name, <<Variable Text 2>>. There is no indication that your information was subject to actual or attempted misuse.

What We Are Doing. We take this incident and the security of client information within our care very seriously. In addition to the steps described above, as part of our ongoing commitment to the privacy of personal information in our care, we are undertaking a review of our existing policies, procedures, and training programs and are looking into implementing additional safeguards to further secure the information in our systems.

As an added precaution, we are also offering <<twelve (12) / twenty-four (24)>> months of complimentary access to credit monitoring, fraud consultation, and identity theft restoration services. Individuals who wish to receive these services must enroll by following the attached enrollment instructions.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. You can find out more about how to protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Help Protect Your Personal Information*. There you will also find more information on the credit monitoring services we are offering and how to enroll.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call the dedicated assistance line that we have helped set-up 1-800-939-4170, Monday through Friday from 9 a.m. – 9 p.m. Eastern Time, excluding U.S. holidays.

Veris sincerely regrets any inconvenience or concern this incident may have caused you.

Sincerely,

A handwritten signature in black ink, appearing to read 'SCR', is positioned above the typed name.

Stephanie Cohn-Rupp
Chief Executive Officer
Veris Wealth Partners

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

We are offering <<12/24>> months of identity theft protection services through IDX, the data breach and recovery services expert. IDX identity protection services include:

- **Single Bureau Credit Monitoring** – Monitoring of credit bureau for changes to the member’s credit file such as new credit inquiries, new accounts opened, delinquent payments, improvements in the member’s credit report, bankruptcies, court judgments and tax liens, new addresses, new employers, and other activities that affect the member’s credit record.
- **CyberScan** – Dark Web monitoring of underground websites, chat rooms, and malware, 24/7, to identify trading or selling of personal information like Social Security numbers, bank accounts, email addresses, medical ID numbers, driver’s license numbers, passport numbers, credit and debit cards, phone numbers, and other unique identifiers.
- **Identity Theft Insurance** – Identity theft insurance will reimburse members for expenses associated with restoring their identity should they become a victim of identity theft. If a member’s identity is compromised, the policy provides coverage for up to \$1,000,000, with no deductible, from an A.M. Best “A-rated” carrier. Coverage is subject to the terms, limits, and/or exclusions of the policy.
- **Fully-Managed Identity Recovery** – IDX’s fully-managed recovery service provides restoration for identity theft issues such as (but not limited to): account creation, criminal identity theft, medical identity theft, account takeover, rental application, tax fraud, benefits fraud, and utility creation. This service includes a complete triage process for affected individuals who report suspicious activity, a personally assigned ID Care Specialist to fully manage restoration of each case, and expert guidance for those with questions about identity theft and protective measures.

We encourage you to contact IDX with any questions and to enroll in free 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 a.m. – 9 p.m. Eastern Time. Please note the deadline to enroll is July 23, 2021.

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, military identification, 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 fraud alert or 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
888-298-0045	1-888-397-3742	833-395-6938
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; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. Veris Wealth Partners is located at 17 State Street, Suite 2450, New York, New York 10004.

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 New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your 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 your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You 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 you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfbp_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/>.