



March 21, 2022

Anjali C. Das
312.821.6164 (direct)
Anjali.Das@wilsonelser.com

Via Certified Mail; Return Receipt Requested:

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

RECEIVED

MAR 28 2022

CONSUMER PROTECTION

Re: Cybersecurity Incident Involving White & Associates

Dear Attorney General Formella:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents White & Associates, a CPA firm located in 126 West Segoe Lily Drive, Suite 160, Sandy, UT 84070, with respect to a recent cybersecurity incident that was first discovered by White & Associates on June 25, 2021 (hereinafter, the “Incident”). White & Associates takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the Incident, what information may have been compromised, the number of New Hampshire residents being notified, and the steps that White & Associates has taken in response to the Incident. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring services.

1. Nature of the Incident

On June 25, 2021 White & Associates discovered the Incident when they received telephone calls from clients stating that an employee’s email was hacked. Upon discovery of the incident, White & Associates promptly engaged a specialized cybersecurity firm to conduct a forensic investigation to determine the nature and scope of the incident. The forensics investigation completed on July 6, 2021 and found there was evidence that some of the client data may have been accessed by an unauthorized individual. On October 7, 2021, White & Associates engaged a data mining vendor to identify the individuals whose sensitive information was stored in the compromised account. This step was necessary so that White & Associates could send a notice of the incident to ensure the potentially impacted clients are aware of this Incident. On January 4, 2022, White & Associates was able to finalize the list of individuals to notify. Thereafter, White & Associates engaged a third party vendor to assist with mailing notices, setting up a call center to answer questions regarding the incident, and to provide credit monitoring and identity theft protection services to all affected parties at no cost to them.

55 West Monroe Street, Suite 3800 • Chicago, IL 60603 • p 312.704.0550 • f 312.704.1522

Alabama • Albany • Atlanta • Austin • Baltimore • Beaumont • Boston • Chicago • Dallas • Denver • Edwardsville • Garden City • Hartford • Houston
Indiana • Kentucky • Las Vegas • London • Los Angeles • Miami • Michigan • Milwaukee • Mississippi • Missouri • Nashville • New Jersey • New Orleans
New York • Orlando • Philadelphia • Phoenix • San Diego • San Francisco • Sarasota • Stamford • Virginia • Washington, DC • Wellington • White Plains

wilsonelser.com



Although White & Associates is unaware of any fraudulent misuse of information, it is possible that individuals' full name, address, social security numbers, financial account information, credit or debit card number, health information, driver's license number, and health insurance information may have been exposed as a result of this unauthorized activity.

As of this writing, White & Associates has not received any reports of related identity theft since the date of the incident (June 25, 2021 to present).

2. Number of New Hampshire residents affected.

A total of two (2) New Hampshire residents may have been potentially affected by this incident. Notification letters to these individuals were mailed on March 21, 2022, by first class mail. A sample copy of the notification letter is included with this letter under **Exhibit A**.

3. Steps taken in response to the Incident.

White & Associates is committed to ensuring the security and privacy of all personal information in its control, and is taking steps to prevent a similar incident from occurring in the future. Upon discovery of the Incident, White & Associates moved quickly to investigate and respond to the Incident, assessed the security of its systems, and notified the potentially affected individuals. Specifically, White & Associates engaged a specialized cybersecurity firm to conduct a forensic investigation to determine the nature and scope of the Incident. Additionally, White & Associates changed the password to the compromised employee's account. Lastly, White & Associates informed our law firm and began identifying the potentially affected individuals in preparation for notice.

Although White & Associates is not aware of any actual or attempted misuse of the affected personal information, White & Associates offered twelve (12) months of complimentary credit monitoring and identity theft restoration services through Cyberscout to all individuals to help protect their identity. Additionally, White & Associates provided guidance on how to better protect against identity theft and fraud, including providing 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 the contact details for the Federal Trade Commission.

4. Contact information

White & Associates remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Anjali.Das@WilsonElser.com or 312-821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Anjali C. Das

Anjali C. Das

EXHIBIT A

<Return Name>
<Return Address>
<City> <State> <Zip>

WHITE
&
ASSOCIATES, LLC
Certified Public Accountants

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

March X, 2022

Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

White & Associates is writing to inform you of a recent cybersecurity incident (the "Incident") that involved some of your personal information. This letter contains details about the Incident, steps we have taken in response, and services we are making available to you.

What Happened?

On or about June 25, 2021, White & Associates learned it had become a victim of a cybersecurity incident which may have resulted in unauthorized access to your Personally Identifiable Information ("PII"). After learning about the potential unauthorized access, White & Associates immediately launched an investigation to review the impacted servers in order to learn more about the scope and extent of the incident, and whether PII may have been exposed. The investigation completed on July 6, 2021, which determined that one email account was compromised. Based on these findings, White & Associates performed data mining on the affected account to identify the specific individuals and the types of information that may have been compromised. On January 4, 2022, White & Associates was able to finalize the list of individuals to notify.

What Information Was Involved?

The investigation determined that some of the data on our systems may have been accessed by an unauthorized individual. Upon further review of the files, White & Associates discovered that personally identifiable information, such as your full name in combination with <<data elements>> may have been impacted.

What We Are Doing

White & Associates takes the security of your personal information very seriously and has taken steps to prevent a similar event from occurring in the future. In order to help relieve concerns and restore confidence following this incident, we are providing you with access to Single Bureau Credit Monitoring* services at no charge. These services provide you with alerts for twelve months from the date of enrollment when changes occur to your Experian credit file. This notification is sent to you the same day that the change or update takes place with the bureau. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event you become a victim of identity theft. These services will be provided by Cyberscout, a company specializing in fraud assistance and remediation services. We remain dedicated to maintaining the security and protection of your information.

What You Can Do

Although we are not aware of any instances of misuse of personal information, we recommend you take advantage of the complimentary credit monitoring services out of an abundance of caution. Instructions on how to do so are included in the materials enclosed with this letter. We encourage you to remain vigilant and review the enclosed addendum outlining additional steps you can take to protect your personal information. If you have any questions or want to enroll in the complimentary identity monitoring services, please follow the instructions below.

To enroll in Credit Monitoring* services at no charge, please log on to <https://www.myidmanager.com> and follow the instructions provided. When prompted please provide the following unique code to receive services: <<unique code>> In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter.

For More Information

White & Associates recognizes that you may have questions not addressed in this letter. If you have additional questions, please call 1-844-520-0608 (toll free) during the hours of 8 a.m. and 8 p.m. Eastern Time, Monday through Friday (excluding U.S. national holidays). Representatives are available for 90 days.

White & Associates sincerely regrets any inconvenience or concern that this matter may cause and remains dedicated to ensuring the privacy and security of all information in our control.

Sincerely,

Signature

* Services marked with an "*" require an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

Additional Important Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone or online. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years.

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289

www.transunion.com/fraud-alerts

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-800-525-6285

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

Monitoring: You should always remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and by monitoring your credit report for suspicious or unusual activity.

Identity Protection PIN: You can get a six-digit Identity Protection PIN to prevent someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. An IP PIN is used by the IRS to verify your identity when filing your electronic or paper tax return. To receive an IP Pin, you must register to validate your identity at IRS.gov. Use the Get an IP PIN tool available between mid-January through mid-November to receive your IP PIN.

<https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>

Security Freeze: You have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free

security freeze by contacting any one or more of the following national consumer reporting agencies:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-888-298-0045

<https://www.equifax.com/personal/credit-report-services/credit-freeze/>

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: 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, 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. Instances of known or suspected identity theft should also be reported to law enforcement.

For residents of Iowa: State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Massachusetts: It is required by state law that you are informed of your right to obtain a police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For residents of New Mexico: State law advises you to review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. 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 agencies 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 violators. 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 at 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 residents of Oregon: State law advises you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Rhode Island: It is required by state law that you are informed of your right to file or obtain a police report in regard to this incident.

For residents of Arizona, Colorado, District of Columbia, Illinois, Maryland, New York, North Carolina, and

Rhode Island: You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Federal Trade Commission - Consumer Response Center: 600 Pennsylvania Ave, NW, Washington, DC 20580; 1-877-IDTHEFT (438-4338); www.identitytheft.gov

Arizona Office of the Attorney General Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004 1-602-542-5025

Colorado Office of the Attorney General Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000 www.coag.gov

District of Columbia Office of the Attorney General – Office of Consumer Protection: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; www.oag.dc.gov

Illinois office of the Attorney General - 100 West Randolph Street, Chicago, IL 60601; 1-866-999-5630; www.illinoisattorneygeneral.gov

Maryland Office of the Attorney General - Consumer Protection Division: 200 St. Paul Place, 16th floor, Baltimore, MD 21202; 1-888-743-0023; www.oag.state.md.us

New York Office of Attorney General - Consumer Frauds & Protection: The Capitol, Albany, NY 12224; 1-800-771-7755; <https://ag.ny.gov/consumer-frauds/identity-theft>

North Carolina Office of the Attorney General - Consumer Protection Division: 9001 Mail Service Center, Raleigh, NC 27699; 1-877-566-7226; www.ncdoj.com

Rhode Island Office of the Attorney General - Consumer Protection: 150 South Main St., Providence RI 02903; 1-401-274-4400; www.riag.ri.gov