



Lauren D. Godfrey
429 Fourth Avenue, Suite 805
Pittsburgh, Pennsylvania 15219
Lauren.Godfrey@lewisbrisbois.com
Direct: 412.567.5113

April 2, 2020

VIA E-MAIL

Attorney General Wayne Stenehjem
Office of the Attorney General
500 East Boulevard Ave., Dept. 125
Bismark, ND 58505
E-Mail: ndag@nd.gov

Re: Notification of Data Security Incident

Dear Attorney General Stenehjem:

We represent the Wahl Law Firm, PLLC (the "Firm") in connection with a data security incident which is described in greater detail below. The Firm takes the protection of all sensitive information within its possession very seriously and is taking steps to prevent similar incidents from occurring in the future.

1. Nature of the security incident.

On December 4, 2019, the Firm learned that the personal information of certain of its clients contained within an employee's business email account was potentially exposed to an unauthorized user. This discovery was made during the course of an independent digital forensics investigation. With the assistance of cybersecurity experts, the Firm conducted a thorough review of the information that may have been affected. The Firm then conducted a detailed investigation to identify those individuals whose information was potentially impacted and determine their place of residence. Based upon this analysis, on March 12, 2020, the Firm determined that the names, addresses, dates of birth, Social Security numbers, and driver's license numbers for two (2) North Dakota residents, the name, address, date of birth, and driver's license number for one (1) additional North Dakota resident, and the name, address, and limited medical information of one (1) additional North Dakota resident were contained within the email account and may have been exposed as a result of this Incident.

2. Number of North Dakota residents affected.

The Firm notified the four (4) North Dakota residents of this data security incident via first class U.S. mail on April 2, 2020. A sample copy of the notification letter sent to the affected individuals is included with this correspondence.

3. Steps taken relating to the incident.

The Firm has taken steps in response to this incident to prevent similar incidents from occurring in the future. Those steps have included working with leading cybersecurity experts to enhance the security of its digital environment. The Firm also notified the three major consumer reporting agencies of the incident and reported the incident to the FBI in an effort to hold the wrongdoers accountable. Furthermore, while the Firm is not aware of the misuse of any information as a result of this incident, out of an abundance of caution, the Firm is also providing twenty-four (24) months of complimentary MyIDCare™, identity theft protection services through ID Experts®, a data breach and recovery services expert. MyIDCare services include twenty-four (24) months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services at no cost to the impacted individuals.

4. Contact information.

The Firm remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact me at (412) 567-5113 or via email at Lauren.Godfrey@lewisbrisbois.com.

Respectfully,

/s/ Lauren D. Godfrey

Lauren D. Godfrey, CIPP/US of
LEWIS BRISBOIS BISGAARD & SMITH LLP

LDG:arb

Encl.: Sample Consumer Notification Letter

Wahl Law Firm, PLLC

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

April 3, 2020

Re: Notification of Data Security Incident

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

I am writing to inform you of a data security incident that may have involved some of your personal information. As a solo practitioner, I take the privacy and security of your information very seriously. This is why I am contacting you, offering you complimentary credit monitoring and identity protection services, and informing you about steps you can take to help protect your personal information.

What Happened? On December 4, 2019, I learned that the personal information of some of my clients contained in my business email account was potentially exposed to an unauthorized user. This discovery was made during the course of an ongoing independent digital forensics investigation. With the assistance of cybersecurity experts, I conducted a thorough review of the information that may have been affected. We then worked diligently to identify up-to-date address information in order to notify all potentially impacted individuals, which was completed on March 12, 2020. While I am unaware of any evidence indicating that anyone's information has been misused as a result of this incident, I am providing this letter to you to inform you of the incident and provide steps you can take to further protect your personal information.

What Information Was Involved? Based upon the investigation, the information may include your <<Variable Text>>.

What I Am Doing. As soon as this incident was discovered, I immediately took steps to secure my digital environment and launched an internal investigation. I also engaged an independent forensics firm to determine what happened and whether any personal information may have been accessed or acquired without authorization. In addition, I took affirmative steps to minimize the likelihood of a similar incident occurring in the future. This includes working with cybersecurity experts to enhance the security of the firm's digital environment. Further, I have notified the three major consumer reporting agencies of the incident. I am also providing you with information about steps that you can take to help protect your personal information. As an added precaution, I am offering you complimentary MyIDCare™, identity theft protection services through ID Experts®, a data breach and recovery services expert. MyIDCare services include twenty-four (24) months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services at no cost to you.

What You Can Do. You can follow the recommendations on the following page to help protect your personal information. Also, while there is no indication that anyone's information has been misused as a result of this incident, as a precautionary measure to safeguard your information, I encourage you to enroll in free MyIDCare services by calling 1-800-939-4170 or going to <https://app.myidcare.com/account-creation/protect> and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 7:00 a.m. to 7:00 p.m. Mountain Time. Please note that the deadline to enroll is July 3, 2020.

For More Information: I remain committed to protecting the personal information in my care and apologize for any worry or inconvenience this may cause you. If you have any questions, please contact the ID Experts helpline at 1-800-939-4170 or go to <https://app.myidcare.com/account-creation/protect>, and have your unique code ready to provide to the fraud specialist.

Sincerely,

A handwritten signature in black ink that reads "C Wahl". The "C" is a large, stylized capital letter, and "Wahl" is written in a cursive, lowercase script.

Craig Wahl
Wahl Law Firm, PLLC

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 and review 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 should also 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 also 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
--	--	---	--

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 90 days. 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 North Carolina 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	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226
--	---

You also have certain rights under the Fair Credit Reporting Act (FCRA): 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 a 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. You can review your rights pursuant to the Fair Credit Reporting Act by visiting 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.