

January 13, 2022

**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Office of the North Dakota Attorney General  
Attorney General Wayne Stenehjem  
600 East Boulevard Avenue, Department 125  
Bismark, ND 58505

RE: Data Incident Notification

Dear Attorney General Stenehjem:

Our firm represents Boxer Property Management Corporation (“Boxer”). Boxer hereby formally submits notification of a recent data incident pursuant to N.D.C.C. § 51-30-02. Boxer reserves the right to supplement this notice with any significant details learned subsequent to this submission. By providing this notice, Boxer does not waive any rights or defenses regarding the applicability of North Dakota law, including the applicability of N.D.C.C. § 51-30, the applicability of any other laws of this or any other state, or the existence of personal jurisdiction over Boxer.

Around October 1, 2021, Boxer identified suspicious activity on its network. Upon discovering this activity and over the course of multiple weeks, Boxer conducted an investigation, acted to disrupt the threats, and worked to ensure minimal disruption to Boxer systems. Boxer also quickly engaged third party forensic experts and counsel experienced in handling cyberattacks to assist in the investigation.

Boxer believes that its efforts were largely successful in limiting the impact of the attack. Nevertheless, after reviewing the results of the investigation and assessing what information was affected, Boxer determined on November 30, 2021, that some personal information of Boxer employees, tenants and investors was accessed or acquired by the threat actors who perpetrated the attack, including names, addresses, phone number, date of birth and/or Social Security numbers, driver license numbers, passport numbers and/or (for a limited number of Boxer tenants) financial account information (the “Incident”).

Boxer then undertook an analysis to determine the specific individuals affected by this Incident. It is important to note that Boxer does not have any evidence that any fraud or identity theft has occurred because of this Incident. Boxer also communicated with law enforcement about the Incident.

Attorney General Wayne Stenehjem

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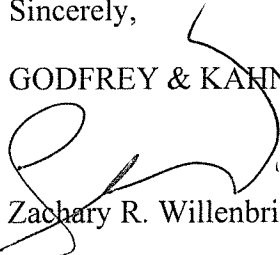
Nonetheless, out of an abundance of caution, Boxer has decided to notify your office (via this letter) and the one (1) North Dakota resident potentially affected by this Incident on or about January 14, 2022. A sample notification letter to the affected resident is attached hereto as Exhibit A.

Boxer takes the security of personal information seriously. Boxer discovered the Incident while routinely reviewing its computer systems activity. Boxer has taken further steps to bolster the security of its networks and systems, including by upgrading its firewalls, implementing additional authentication requirements, and supplementing its software and services-based detection and response capabilities. In addition, Boxer has retained Kroll, Inc. to provide notice to affected individuals and Experian to provide free identity theft and credit monitoring services.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

GODFREY & KAHN, S.C.



Zachary R. Willenbrink

LLC

**EXHIBIT A**

**Sample Notification Letter**



720 N. Post Oak Road, Suite 500  
Houston, Texas 77024  
T 713.777.RENT  
F 713.780.9708

<<Date>> (Format: Month Day, Year)

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country>>

## NOTICE OF DATA BREACH

Dear <<first\_name>> <<middle\_name>>.<<last\_name>> <<suffix>>,

Boxer Property ("Boxer", "we", "us", or "our") recently suffered a cyberattack which may have exposed some of your personal information. We are writing, as a precautionary measure, to notify you of the incident and provide more details about it because Boxer values the security and privacy of your information, is committed to ensuring you understand what happened, and wants to provide you with the tools to assist you in securing and protecting your information if you have ongoing concerns.

### What happened?

Around October 1, 2021, Boxer identified suspicious activity on its network. Upon discovering this activity and over the course of multiple weeks, Boxer conducted an investigation and acted to disrupt the threats. Boxer also quickly engaged third party forensic experts and counsel experienced in handling cyberattacks to assist in the investigation.

We believe that our efforts were largely successful in limiting the impact of the attack. Nevertheless, after reviewing the results of the investigation and assessing what information was affected, Boxer determined on November 30, 2021, that some personal information was accessed or acquired by the threat actors who perpetrated the attack. Boxer then undertook an analysis to determine the individuals affected by this incident. It is important to note that Boxer does not have any evidence that any fraud or identity theft has occurred because of this incident. Boxer also communicated with law enforcement about the incident.

Because Boxer values transparency and your security and privacy, Boxer is providing this notification to you as an individual whose personal information was affected.

### What information was involved?

The personal information about you affected by this incident includes your: name, address, phone number, Social Security number, and date of birth.

### What we are doing.

In addition to providing you this notice and communicating with law enforcement, Boxer has conducted a full investigation of the incident and taken further steps to bolster the security of its networks and systems, including by upgrading its firewalls, implementing additional authentication requirements, and supplementing its software and services-based detection and response capabilities.

Furthermore, because Boxer values its relationship with its employees, we are offering you a complimentary 12-month membership of Experian's® IdentityWorks<sup>SM</sup>.

This product provides you with superior identity detection and resolution of identity theft. Ensure that you **enroll by:** <<b2b\_text\_6(activation deadline)>>. (Your code will not work after this date.) To activate your membership and start monitoring your personal information please follow these two simple steps:

- 1) Visit the **Experian IdentityWorks website:** <https://www.ExperianIDWorks.com/3bcredit>
- 2) Provide your **activation code:** <<activation code s\_n>>

If you have questions about the IdentityWorks product, need assistance with identity restoration, or would like an alternative to online enrollment in IdentityWorks, please contact Experian's customer care team at 877.288.8057 by <<b2b\_text\_6(activation deadline)>>. Be prepared to provide **Engagement Number** <<b2b\_text\_1(engagement number)>> as proof of eligibility.

A credit card is not required for enrollment in Experian IdentityWorks, and your enrollment grants you access to the following features:

- **Experian credit report at signup:** See what information is associated with your credit file.<sup>1</sup>
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit- and non-credit-related fraud.<sup>2</sup>
- **Experian IdentityWorks ExtendCARE™:** You may elect to continue receiving the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance:** Provides coverage for certain costs and unauthorized electronic fund transfers.

The Experian IdentityWorks website provides additional information about each of these features, as well as self-help tips and information about identity protection at this site.

#### **What you can do.**

To date, Boxer has not received any reports of misuse of your personal information. However, if you are concerned about your information, please consider:

- enrolling in the Experian IdentityWorks program described above;
- referring to the "**Additional Resources**" section included with this letter, which includes additional steps you can take to protect your information, recommendations from the Federal Trade Commission regarding identity theft protection, and details on how to place a fraud alert or a security freeze on your credit file;
- monitoring your financial accounts and promptly contacting your financial institution if you see any evidence of unauthorized activity; and
- promptly reporting any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, including your state attorney general and the Federal Trade Commission (FTC).

#### **For more information.**

Protecting your information is important to us. While we trust that the services we are offering to you demonstrate our continued commitment to your security and privacy, we also sincerely apologize for any inconvenience and concern this incident may cause you.

If you have further questions about this incident or need additional information and assistance, please contact us at **(855) 618-3167**, Monday through Friday from 8:00 a.m. to 5:30 p.m. CT, excluding major U.S. holidays.

Sincerely,

Boxer Property

<sup>1</sup> Individuals who enroll online in IdentityWorks can also elect to receive daily credit reports.

<sup>2</sup> Please note that this Identity Restoration support is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration).

## **ADDITIONAL RESOURCES**

### **Contact information for the three nationwide credit reporting agencies:**

**Equifax**, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111

**Experian**, PO Box 2104, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742

**TransUnion**, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com), 1-800-888-4213

**Free Credit Report.** It is recommended that you remain vigilant by reviewing account statements and monitoring your credit report for unauthorized activity, especially activity that may indicate fraud and identity theft. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit [www.annualcreditreport.com](http://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 from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to:

Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

**For Colorado, Georgia, Maine, Maryland, New Jersey, Puerto Rico, and Vermont residents:** You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**Fraud Alerts.** There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and you have the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

**Security Freeze.** You have the ability to place a security freeze, also known as a credit freeze, on your credit report free of charge.

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 may use an online process, an automated telephone line, or submit a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that, if you are requesting a credit report for your spouse, 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 5 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, and display your name, current mailing address, and the date of issue.

**Federal Trade Commission and State Attorneys General Offices.** If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or minimize the risks of identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**For Maryland residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-743-0023.

**For North Carolina residents:** You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), 1-877-566-7226.

**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 California Residents:** You may also wish to review the information provided by the California Attorney General at <https://oag.ca.gov/idtheft>.

### **Reporting of identity theft and obtaining a police report.**

**For Iowa residents:** You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General at [consumer@ag.iowa.gov](mailto:consumer@ag.iowa.gov), by calling (515) 281-5926, or writing to 1305 E. Walnut Street Des Moines, Iowa 50319-0106.

**For Oregon residents:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General at <https://doj.state.or.us>, by calling (877) 877-9392, or writing to Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096.