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February 22, 2022

VIA EMAIL

Attorney General Wayne Stenehjem
Office of the Attorney General
Consumer Protection and Antitrust
1050 East Interstate Avenue, Suite 200
Bismarck, ND 58503-5574
E-Mail: ndag@nd.gov

Re: Notice of Data Security Incident

Dear Attorney General Stenehjem:

Lewis Brisbois Bisgaard & Smith LLP (“Lewis Brisbois”) represents CHR Solutions, Inc. (“CHR”), a company that specializes in providing software and IT services to telecommunication companies, in connection with a recent data security incident described in greater detail below. This letter is being sent because the personal information of three (3) North Dakota residents may have been affected by a recent data security incident experienced by CHR. The incident may have involved the North Dakota residents’ names and Social Security numbers.

1. Nature of the security incident.

On October 30, 2021, CHR discovered that it had experienced an encryption event. In response, CHR took steps to secure its systems and launched an investigation with the assistance of leading, independent digital forensics and cybersecurity experts. Through this investigation, CHR determined that certain CHR data may have been accessed without authorization in late October 2021. CHR then immediately began a thorough review of the potentially affected data, which concluded on January 10, 2022. CHR then took steps to identify current mailing addresses needed to provide notice to potentially affected individuals.

2. Number of North Dakota residents affected.

CHR notified three (3) North Dakota residents of this incident via first class U.S. mail on February 22, 2022. A sample copy of the notification letter is included with this correspondence.

3. Steps taken relating to the Incident.

As soon as CHR discovered this incident, CHR took steps to secure its systems and launched an investigation to determine what happened and whether personal information had been accessed or acquired without authorization. CHR has also implemented additional safeguards to help ensure the security of its systems and to reduce the risk of a similar incident occurring in the future.

CHR has established a toll-free call center through Kroll, a leader in risk mitigation and response, to answer any questions about the incident and address related concerns. In addition, CHR is also providing complimentary identity protection services to notified individuals.

4. Contact information.

CHR 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 Lewis Brisbois.

Best regards,

A handwritten signature in black ink, appearing to read 'Aubrey L. Weaver', with a stylized, flowing script.

Aubrey L. Weaver of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Sample Notification Letter



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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Re: Notice of Data Security Incident

Dear <<First_Name>> <<Last_Name>>,

I am writing to inform you of a data security incident experienced by CHR Solutions, Inc. ("CHR") that may have impacted some of your personal information. CHR takes the privacy and security of all information very seriously. This letter contains information about the incident, steps that you can take to help protect your information, and resources that CHR is making available to assist you.

What Happened? On October 30, 2021, CHR became aware of unusual activity within its network environment and discovered that it had been the victim of data encryption by an unknown actor. Upon discovering this activity, we took steps to secure our environment and launched an investigation with the assistance of leading independent digital forensics and cybersecurity experts. The investigation determined that certain CHR data may have been accessed without authorization in late October 2021. CHR thereafter initiated a review to identify the contents of the data. On January 10, 2022, this review revealed that some of your personal information may have been contained therein. Since that time, we have been working to gather updated contact information to provide notification to all potentially affected individuals.

What Information Was Involved? The potentially affected information may have included your <<b2b_text_1(DataElements)>>.

What We Are Doing. As soon as we discovered this incident, CHR took the steps described above. We have also improved our systems to reduce the likelihood of a similar incident occurring in the future. In addition, CHR reported this matter to the Federal Bureau of Investigation and will continue to cooperate with any investigation into the incident.

To help relieve concerns and to help protect your identity following this incident, CHR is providing you with information about steps you can take to help protect your personal information and offering you identity monitoring services at no cost to you for 1 year through Kroll. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6(ActivationDeadline)>> to activate your identity monitoring services.

Membership Number: <<MembershipNumber(S_N)>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

If you prefer to activate these services offline and receive monitoring alerts via the US Postal Service, you may activate via our automated phone system by calling 1-888-653-0511, Monday through Friday, 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays. Please have your membership number located in your letter ready when calling. Please note that to activate monitoring services, you will be required to provide your name, date of birth, and Social Security number through our automated phone system.

Additional information describing your services is included with this letter.

What You Can Do. CHR recommends that you review the guidance included with this letter about how to help protect your information. We encourage you to contact Kroll with any questions. Kroll representatives are available Monday through Friday from 8:00 A.M to 5:30 P.M Central Time, excluding major U.S. holidays. Please note the deadline to activate is <<b2b_text_6(ActivationDeadline)>>.

We encourage you to take full advantage of this service offering. Kroll representatives are fully versed on the incident and can answer questions or respond to concerns you may have regarding the protection of your personal information.

For More Information. If you have questions or need assistance, please call 1-855-568-2074, Monday through Friday from 8:00 A.M to 5:30 P.M Central Time, excluding major U.S. holidays.

We take your trust in us and this matter very seriously. Please accept our sincere apologies for any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Pasrija', written in a cursive style with a long horizontal stroke extending to the right.

Arun Pasrija
President & CEO

CHR Solutions, Inc.
9700 Bissonnet, Suite 2900
Houston, TX 77036

Steps You Can Take to Help Protect Your Personal Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing 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 also should 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 1-877-322-8228, 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 also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.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 one year. 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 for up to one year at no cost. 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. 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 fraud alerts, security freezes, and 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.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Washington D.C. Attorney General

441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.