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April 22, 2022

Via Regular Mail and Electronic Mail

Consumer Protection and Antitrust  
1720 Burlington Drive, Suite C  
Bismarck, ND 58504  
ndag@nd.gov

To Whom It May Concern:

We represent Wilson Financial Services (“WFS”) with respect to a data security incident involving the potential exposure of certain personally identifiable information (“PII”) described in more detail below. WFS is located in Fargo, North Dakota and provides businesses and individuals with financial services. WFS is committed to answering any questions you may have about the data security incident, its response, and steps taken to prevent a similar incident in the future.

**1. Nature of security incident.**

On December 6, 2021, WFS became aware of suspicious activity associated with a corporate email account, and immediately began an investigation to determine what occurred and whether any information was at risk. The investigation determined that there may have been unauthorized access to one email account between December 2, 2021 and December 6, 2022. The investigation was unable to determine whether any information in the account was accessed or acquired.

Thus, a vendor was hired to conduct an in-depth review of the email account to determine what personal information may have been stored in the account at the time of intrusion. This review was completed on March 30, 2022, at which point WFS determined that individuals’ names, addresses, driver’s license numbers, Social Security numbers, financial account information, and for a small number of individuals, limited health information such as diagnostic or treatment information, and/or health insurance policy number may have been present.

**2. Number of residents affected.**

One thousand two hundred and sixty-four (1,264) North Dakota residents may have been affected and were notified of the incident. A notification letter was mailed to the potentially affected individuals on April 22, 2022 (a copy of the form notification letter is enclosed as Exhibit A).

April 22, 2022

Page 2

**3. Steps taken in response to the incident.**

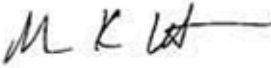
WFS has taken steps to prevent a similar event from reoccurring, including resetting all passwords and implementing multi-factor authentication on all email accounts. In addition, WFS is offering identity theft protection services through IDX, the data breach and recovery services expert. Affected individuals were offered 12 months of credit monitoring and identity protection services through IDX.

**4. Contact information.**

WFS takes the security of their client's information very seriously and is committed to ensuring information within its control is protected. If you have any questions or need additional information, please do not hesitate to contact me at [mventrone@clarkhill.com](mailto:mventrone@clarkhill.com) or (312) 360-2506.

Sincerely,

CLARK HILL

A handwritten signature in black ink, appearing to read 'M K Ventrone', with a horizontal line extending to the right.

Melissa K. Ventrone

## Exhibit A

Wilson Financial Services  
10300 SW Greenburg Rd. Suite 570  
Portland, OR 97223

To Enroll, Please Call:  
1-833-940-2479  
Or Visit:  
<https://app.idx.us/account-creation/protect>  
Enrollment Code: [XXXXXXXXXX]

<<First Name>> <<Last Name>>  
<<Address1>> <<Address2>>  
<<City>>, <<State>> <<Zip>>

April 22, 2022

### Notice of Data Security Incident

Dear <<first name>> <<last name>>:

We wanted to let you know about a data security incident experienced by Wilson Financial Services (WFS) that may have impacted your personal information described in more detail below. We take the privacy and security of your information seriously, and sincerely apologize for any concerns or inconvenience this may cause you. This letter contains information about steps you can take to protect your information and resources we are making available to help you.

#### What Happened:

On December 6, 2021, we became aware of suspicious activity associated with a corporate email account, and immediately began an investigation to determine what occurred and whether any information was at risk. The investigation determined that there may have been unauthorized access to one email account but was unable to determine whether any information in the account was accessed or acquired. A vendor was hired to conduct an in-depth review of the email account to determine what personal information may have been stored in the account. This review was completed on March 30, 2022, at which point we learned that some of your personal information may have been present. While there is no indication that any of your personal information has been misused, out of an abundance of caution, we wanted to let you know about this incident and provide you with resources to help you protect yourself.

#### What Information Was Involved:

Information contained in the account at the time of the incident may have included your name, address, <<variable text>>.

#### What We Are Doing:

We want to assure you that we have taken steps to prevent a similar event from reoccurring, including resetting all passwords and implementing multi-factor authentication on all email accounts. In addition, we are offering identity theft protection services through IDX, the data breach and recovery services expert.

#### What You Can Do:

We encourage you to remain vigilant against incidents of identity theft by reviewing your bank account and other financial statements as well as your credit reports for suspicious activity.

We also encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling 1-833-940-2479 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 am - 9 pm Eastern Time. Please note the deadline to enroll is June 22, 2022.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

**For More Information:**

You will find detailed instructions for enrollment on the enclosed Recommended Steps document. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter.

Please call 1-833-940-2479 or go to <https://app.idx.us/account-creation/protect> for assistance or for any additional questions you may have.

Sincerely,

Warren Walter Wilson  
Wilson Financial Services

Securities offered through Registered Representatives of Cambridge Investment Research, Inc. A broker/dealer, Member FINRA/SIPC. Advisory Services offered through CIRA a Registered Investment Advisor. Wilson Financial Services and Cambridge are not affiliated.



## Recommended Steps to help Protect your Information

- 1. Website and Enrollment.** Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
- 2. Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.
- 3. Telephone.** Contact IDX at 1-833-940-2479 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.
- 4. Review your credit reports.** We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to [www.annualcreditreport.com](http://www.annualcreditreport.com) or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever 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 some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

**5. Place Fraud Alerts** with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. 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. The contact information for all three bureaus is as follows:

### Credit Bureaus

Equifax Fraud Reporting  
1-866-349-5191  
P.O. Box 105069  
Atlanta, GA 30348-5069  
[www.equifax.com](http://www.equifax.com)

Experian Fraud Reporting  
1-888-397-3742  
P.O. Box 9554  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)

TransUnion Fraud Reporting  
1-800-680-7289  
P.O. Box 2000  
Chester, PA 19022-2000  
[www.transunion.com](http://www.transunion.com)

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

**Please Note: No one is allowed to place a fraud alert on your credit report except you.**

**6. Security Freeze.** By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

**7. You can obtain additional information** about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

**California Residents:** Visit the California Office of Privacy Protection ([www.oag.ca.gov/privacy](http://www.oag.ca.gov/privacy)) for additional information on protection against identity theft.

**Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, [www.ag.ky.gov](http://www.ag.ky.gov), Telephone: 1-502-696-5300.

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

**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 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](http://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.

**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/>.

**North Carolina Residents:** Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), Telephone: 1-919-716-6400.

**Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://www.doj.state.or.us/), Telephone: 877-877-9392.

**Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, [www.riag.ri.gov](http://www.riag.ri.gov), Telephone: 401-274-4400.

**All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.