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October 23, 2023

**VIA EMAIL**

Attorney General Brenna Bird  
Office of the Attorney General  
Consumer Protection Division  
Security Breach Notifications  
1305 E Walnut Street  
Des Moines, IA 50319-0106  
Email: [consumer@ag.iowa.gov](mailto:consumer@ag.iowa.gov)

**Re: Notice of Data Security Incident**

Dear Attorney General Bird:

Constangy, Brooks, Smith & Prophete, LLP (“Constangy”) represents LCS Financial Services (“LCS”), a full-service nationwide debt collection agency located in Centennial, Colorado, in connection with a data security incident described in greater detail below. The purpose of this letter is to notify you of the impact to Iowa residents in accordance with Iowa’s data breach notification statute.

**1. Nature of the Security Incident**

On February 25, 2023, LCS became aware of unusual activity that disrupted access to certain systems. Upon discovering this activity, LCS immediately took steps to secure its network and launched an investigation with the assistance of independent cybersecurity experts to determine what happened. The investigation subsequently revealed that certain personal information was acquired without authorization on or about February 24, 2023. LCS then engaged a third-party vendor to commence a comprehensive review of the affected data to determine whether any sensitive data was involved and whether personal information may have been affected.

LCS confirmed that personal information belonging to certain individuals was involved. LCS then took steps to notify those impacted individuals of the incident as quickly as possible. On September 22, 2023, and October 5, 2023, LCS notified 573 Iowa residents of the incident and the Iowa regulatory authority. As detailed below, LCS initiated a third and final round of mailing on October 24, 2023.

Please note that we have no current evidence to suggest misuse or attempted misuse of personal information involved.

## **2. Number of Affected Iowa Residents & Information Involved**

On October 24, 2023, LCS notified an additional 43 Iowa residents. In combination with the 573 residents notified on September 22, 2023, and October 5, 2023, a combined total of 616 Iowa residents have been notified of this incident. The information involved in the incident may differ depending on the individual but may include the following for affected Iowa residents: name and Social Security number.

## **3. Notification of Affected Individuals**

On October 24, 2023, notification letters were mailed to affected Iowa residents by USPS First Class Mail. The notification letter provides resources and steps individuals can take to help protect their information. The notification letter also offers 12 months of complimentary identity protection services to each individual whose personal information was affected by this event, including credit monitoring, \$1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services. Those services are offered by IDX, a company specializing in fraud assistance and remediation services. IDX will also support a call center for 90 days to answer questions and assist with enrollment. A sample copy of the notification letter sent to the impacted individuals is included with this correspondence.

## **3. Steps Taken to Address the Incident**

In response to the incident, LCS retained cybersecurity experts and launched a forensics investigation to determine the source and scope of the compromise. LCS also implemented additional security measures to further harden its digital environment in an effort to prevent a similar event from occurring in the future. Additionally, LCS has reported the incident to the FBI and will cooperate with any resulting investigation.

Finally, LCS is notifying the affected individuals and providing them with steps they can take to protect their personal information as discussed above.

## **4. Contact Information**

LCS remains dedicated to protecting the information in its control. If you have any questions or need additional information, please do not hesitate to contact me at [DMaddux@Constangy.com](mailto:DMaddux@Constangy.com) or 503.312.6251.

Sincerely,

A handwritten signature in blue ink, appearing to read "Donna Maddux", with a long horizontal flourish extending to the right.

Donna Maddux of  
CONSTANGY, BROOKS, SMITH & PROPHETE LLP

Enclosure: Consumer Notification Letter