



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

Vincent F. Regan
Office: (267) 930-4842
Fax: (267) 930-4771
Email: vreagan@mullen.law

309 Fellowship Road, Suite 200
Mt. Laurel, NJ 08054

March 25, 2022

VIA E-MAIL

Office of the Attorney General of Iowa
Consumer Protection Division
Security Breach Notifications
1305 E. Walnut Street
Des Moines, Iowa 50319-0106
E-mail: consumer@ag.iowa.gov

Re: Notice of Data Event

Dear Sir or Madam:

We represent Dutton, Daniels, Hines, Kalkhoff, Cook & Swanson, P.L.C. (“the Dutton Firm”) located at 3151 Brockway Road, Waterloo, Iowa 50701, and are writing to notify your office of an incident that may affect the security of some personal information relating to a yet unknown number of residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, the Dutton Firm does not waive any rights or defenses regarding the applicability of Iowa law, the applicability of the Iowa data event notification statute, or personal jurisdiction.

Nature of the Data Event

On December 7, 2021, the Dutton Firm became aware of technical issues relating to systems in the Dutton Firm network. The Dutton Firm promptly commenced an investigation and identified ransomware on certain systems. The Dutton Firm disconnected their systems and partnered with subject matter specialists to assist with our investigation and to confirm the security of the network. They began restoring the network and business operations and implemented additional security policies and controls. They also communicated the incident to their customers.

On February 21, 2022 the investigation determined the Dutton Firm network was subject to unauthorized access beginning on November 29, 2021 and during that time some files may have been removed by an unauthorized actor. Our investigation revealed some personal information may have been accessed by an unauthorized individual as a result of this incident.

The impacted information varied by individual but may include names, Social Security numbers, driver's license numbers, financial account information, credit card information, medical information, and health insurance information.

Notice to Iowa Residents

On or about March 25, 2022 the Dutton Firm provided notice of this incident to potentially impacted individuals, which includes publication of this incident on the Dutton Firm's website and media notice. Substitute notice is being provided in substantially the same form as the website and media notices attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, the Dutton Firm moved quickly to investigate and respond to the incident, assess the security of the Dutton Firm systems, and notify potentially affected individuals. In order to promptly alert potentially impacted individuals, the Dutton Firm provided substitute notice of this event through a notification on their website as well as a notification to the media. The Dutton Firm is also working to implement additional safeguards and training to its employees.

Additionally, the Dutton Firm is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. the Dutton Firm is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4842.

Very truly yours,



Vincent F. Regan of
MULLEN COUGHLIN LLC

EXHIBIT A

Notice of Data Incident

Dutton, Daniels, Hines, Kalkhoff, Cook & Swanson, P.L.C. (the Dutton Firm) is notifying individuals of a data incident. To date, we have no evidence of actual or attempted misuse of information as a result of this incident. This notice provides details about the incident, our response, and resources available to help protect information.

What Happened? On December 7, 2021, the Dutton Firm became aware of technical issues relating to systems in the Dutton Firm network. We promptly commenced an investigation and identified ransomware on certain systems. We disconnected our systems and partnered with subject matter specialists to assist with our investigation and to confirm the security of our network. We began restoring the network and business operations, and we implemented additional security policies and controls. We also communicated the incident to our customers.

On February 21, 2022 the investigation determined the Dutton Firm network was subject to unauthorized access beginning on November 29, 2021 and during that time some files may have been removed by an unauthorized actor. Our investigation revealed some personal information may have been accessed by an unauthorized individual as a result of this incident.

What Information Was Involved? The impacted information varied by individual but may include names, Social Security numbers, driver's license numbers, financial account information, credit card information, medical information, and health insurance information.

What Are We Doing? The Dutton Firm is committed to safeguarding information in its care and has strict security measures in place to protect information in our care. Upon learning of this incident, we moved quickly to investigate and respond and to confirm the security of our systems. We remain available to coordinate with our clients and to respond to any further questions they have. As part of the Dutton Firm's ongoing commitment to the privacy of information in our care, we reviewed our existing policies and procedures and implemented additional safeguards to further our already stringent security policies and procedures and to secure the information in our systems. We notified the FBI and relevant regulators. We will also notify the media.

What You Can Do. We do not have any evidence of misuse of personal information at this time. However, we encourage individuals to remain vigilant by reviewing documents for suspicious activity, including account statements and credit reports. Any suspicious activity on your credit report should be reported immediately to law enforcement.

For More Information

If you have additional questions, you may contact the Dutton Firm at info@duttonfirm.com.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

As a general practice, we encourage individuals to frequently reset online account passwords, to use complex password combinations, and to not share passwords or use identical passwords for multiple online accounts. You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You

have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 441 4th St. NW #1100 Washington, D.C. 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. The Dutton Firm is located at 3151 Brockway Road, Waterloo, IA 50701.

For 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 bureaus 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 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. We encourage you to 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.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; <http://www.riag.ri.gov/>; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.

Notice of Data Incident

Waterloo, Iowa, March 25, 2022: Dutton, Daniels, Hines, Kalkhoff, Cook & Swanson, P.L.C. (the Dutton Firm) is notifying individuals of a data incident. To date, we have no evidence of actual or attempted misuse of information as a result of this incident. This notice provides details about the incident, our response, and resources available to help protect information.

What Happened? On December 7, 2021, the Dutton Firm became aware of technical issues relating to systems in the Dutton Firm network. We promptly commenced an investigation and identified ransomware on certain systems. We disconnected our systems and partnered with subject matter specialists to assist with our investigation and to confirm the security of our network. We began restoring the network and business operations, and we implemented additional security policies and controls. We also communicated the incident to our customers.

On February 21, 2022 the investigation determined the Dutton Firm network was subject to unauthorized access beginning on November 29, 2021 and during that time some files may have been removed by an unauthorized actor. Our investigation revealed some personal information may have been accessed by an unauthorized individual as a result of this incident.

What Information Was Involved? The impacted information varied by individual but may include names, Social Security numbers, driver's license numbers, financial account information, credit card information, medical information, and health insurance information.

What Are We Doing? The Dutton Firm is committed to safeguarding information in its care and has strict security measures in place to protect information in our care. Upon learning of this incident, we moved quickly to investigate and respond and to confirm the security of our systems. We remain available to coordinate with our clients and to respond to any further questions they have. As part of the Dutton Firm's ongoing commitment to the privacy of information in our care, we reviewed our existing policies and procedures and implemented additional safeguards to further our already stringent security policies and procedures and to secure the information in our systems. We notified the FBI and relevant regulators.

What You Can Do. We do not have any evidence of misuse of personal information at this time. However, we encourage individuals to remain vigilant by reviewing documents for suspicious activity, including account statements and credit reports. Any suspicious activity on your credit report should be reported immediately to law enforcement.

For More Information

If you have additional questions, you may contact the Dutton Firm at info@duttonfirm.com.

Monitor Your Accounts: Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a credit freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information: As a general practice, we encourage individuals to frequently reset online account passwords, to use complex password combinations, and to not share passwords or use identical passwords for multiple online accounts. You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.