



150 N. Riverside Plaza, Suite 3000, Chicago, IL 60606 • (312) 819-1900

March 30, 2021

Bruce A. Radke
312-463-6211
312-819-1910
bradke@polsinelli.com

VIA E-MAIL (CONSUMER@AG.IOWA.GOV)

Consumer Protection Division
Security Breach Notifications
Office of the Attorney General of Iowa
1305 E. Walnut Street
Des Moines, Iowa 50319

Re: *Notification of a Potential Data Security Incident*

Dear Madam/Sir:

We represent Holmes Murphy and Associates, LLC (“Holmes Murphy”) in connection with a recent incident that may have involved the personal information of seven hundred and thirty-three (733) Iowa residents, and we provide this notice on behalf of Holmes Murphy pursuant Iowa Code § 715C.1-2. This notice will be supplemented, if necessary, with any new, significant facts discovered subsequent to its submission. While Holmes Murphy is notifying you of this incident, Holmes Murphy does not waive any rights or defenses relating to the incident, this notice, or the applicability of Iowa law on personal jurisdiction.

NATURE OF THE SECURITY BREACH OR UNAUTHORIZED USE OR ACCESS

Holmes Murphy recently determined that an unauthorized person was able to remotely access four (4) employee email accounts. Upon discovering the incident, Holmes Murphy immediately took action, including resetting the email account credentials and retaining a leading forensic security firm to investigate and confirm the overall security of its email and computer systems.

On or around March 5, 2021, Holmes Murphy determined that the personal information contained in the four (4) impacted email accounts included the names, dates of birth, driver’s license numbers, and Social Security numbers of seven hundred and thirty-three (733) Iowa residents. At this point, Holmes Murphy is not aware of any fraud or identity theft to any individual as a result of this incident and cannot confirm if any personal information was actually accessed by an unauthorized party. Nevertheless, because there was an email account compromise and Holmes Murphy cannot isolate exactly what, if any, information may have been accessed, Holmes Murphy is notifying all individuals whose personal information could have been viewed.

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Atlanta Boston Chicago Dallas Denver Houston Kansas City Los Angeles Nashville New York Phoenix
St. Louis San Francisco Seattle Washington, D.C. Wilmington
Polsinelli PC, Polsinelli LLP in California

March 30, 2021

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NOTIFICATION TO THE IOWA RESIDENTS

The incident may have involved seven hundred and thirty-three (733) Iowa residents. Holmes Murphy is mailing the notification letters to the involved individuals today, March 30, 2021. Enclosed are samples of the notices that are being sent to the involved individuals via first-class United States mail. The notification letters include an offer for one year of complimentary credit monitoring and identity theft protection services.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, Holmes Murphy promptly secured the four (4) impacted email accounts to prevent further access. It also conducted a comprehensive search for any personal information in the email accounts and retained a leading forensic security firm to investigate and confirm the security of its email and computer systems. Holmes Murphy is also providing the Iowa residents with an offer for one year of complimentary credit monitoring and identity theft protection services.

CONTACT INFORMATION

Please do not hesitate to contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,



Bruce A. Radke

Enclosures



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

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

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

We value and respect the privacy of your information, which is why we are writing to advise you of a recent incident that may have involved some of your personal information. This letter provides some additional information about the incident and steps you can take to protect yourself from the misuse of your information. We have also arranged for complimentary credit monitoring and have included with this letter instructions on how you can sign-up for these services.

What Happened? We recently learned that some of your information could have been viewed by an unauthorized third party who gained access to a limited number of employee email accounts for a short period of time on November 11, 2020.

What Information Was Involved? Upon learning of the incident, we promptly reset the credentials of the compromised email accounts to prevent further access. We also retained a leading forensic security firm to investigate and conduct a comprehensive search for any personal information in the impacted email accounts and to confirm the security of our email and computer systems. On or around March 5, 2021, our investigation determined that the impacted email accounts contained your name, date of birth, and Social Security number.

What We Are Doing. We are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. **For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary, one-year membership, please see the additional information attached to this letter.**

What You Can Do. You can find more information on steps to protect yourself against identity theft or fraud in the enclosed *Additional Important Information* sheet. This notification was not delayed as a result of a law enforcement investigation.

Other Important Information. For further information and assistance, please call [1-800-833-8333](tel:1-800-833-8333) from 6:00 a.m. to 3:30 p.m. Pacific Time.

Sincerely,

A handwritten signature in black ink that reads 'Chris Nelson'.

Chris Nelson
General Counsel
Holmes Murphy and Associates, LLC

Activate IdentityWorksSM Credit 3B

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: <<b2b_text_1(EnrollmentDeadline)>> (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: <<Member ID>>

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number <<b2b_text_2(EngagementNumber)>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcredit> or call 877-288-8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by 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 can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax	Experian	TransUnion
1-866-349-5191	1-888-397-3742	1-800-888-4213
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 740241	P.O. Box 9554	P.O. Box 1000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze	Experian Security Freeze	TransUnion Security Freeze
1-800-349-9960	1-888-397-3742	1-888-909-8872
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 105788	P.O. Box 9554	P.O. Box 160
Atlanta, GA 30348	Allen, TX 75013	Woodlyn, PA 19094

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by requesting information in writing from the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. NW, Washington, DC 20580.

Iowa Residents: Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

North Carolina Residents: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699-9001, (877) 566-7226.

New York State Residents: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; <https://ag.ny.gov/consumer-frauds/identity-theft>; (800) 771-7755.



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

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

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

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What You Can Do. You can find more information on steps to protect yourself against identity theft or fraud in the enclosed *Additional Important Information* sheet.

Other Important Information. For further information and assistance, please call [1-800-828-8888](tel:1-800-828-8888) from 6:00 a.m. to 3:30 p.m. Pacific Time.

Sincerely,

A handwritten signature in black ink that reads 'Chris Nelson'.

Chris Nelson
General Counsel
Holmes Murphy and Associates, LLC

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** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

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Equifax 1-866-349-5191 www.equifax.com P.O. Box 740241 Atlanta, GA 30374	Experian 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013	TransUnion 1-800-888-4213 www.transunion.com P.O. Box 1000 Chester, PA 19016
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Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by requesting information in writing from the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. NW, Washington, DC 20580.

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