



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

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426 W. Lancaster Avenue, Suite 200  
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April 12, 2021

**VIA E-MAIL**

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

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Ag Solutions IT LLC (“ASI”) located at 2803 N. Nebraska Avenue, York, Nebraska 68467, and are writing to notify your office of an incident that may affect the security of some personal information relating to eight hundred twenty (820) Iowa residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, ASI 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 or about January 11, 2021, ASI became aware of potential unauthorized access to its network. ASI immediately began an investigation, with the assistance of counsel and third-party forensics specialists, to determine the nature and scope of the event. On January 29, 2021, ASI confirmed that folders on its systems may have been accessed or removed from its systems without authorization. ASI therefore undertook a time-intensive, thorough review of the potentially impacted folders and its internal files and systems in order to identify the information that was potentially impacted and to whom it related. On February 25, 2021, ASI determined that one or more of the folders contained personal information. ASI then undertook a diligent review of its internal files to identify the individuals to whom the data relates and the appropriate contact information for those individuals, which was completed on March 23, 2021. ASI thereafter worked to provide notification to potentially impacted individuals as quickly as possible.

The information that could have been subject to unauthorized access includes name and Social Security number.

### **Notice to Iowa Residents**

On April 12, 2021, ASI provided written notice of this incident to affected individuals, which includes eight hundred twenty (820) Iowa residents. Written notice was provided in substantially the same form as the letter attached hereto as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Upon discovering the event, ASI moved quickly to investigate and respond to the incident, assess the security of ASI systems, and notify potentially affected individuals. ASI is also working to implement additional safeguards and training to its employees. Further, ASI is providing access to credit monitoring and identity theft restoration services for twenty-four (24) months, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. ASI will also be notifying other regulatory authorities, as required.

Additionally, ASI 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. ASI is also providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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) 930-4005.

Very truly yours,



Julie Siebert-Johnson of  
MULLEN COUGHLIN LLC

# EXHIBIT A



<<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 <<b2b\_text\_3(Header)>>**

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>:

Ag Solutions IT, LLC (“ASI”), which provides IT services to <<b2b\_text\_1(EntityName)>> members, recently discovered an incident that may affect the security of your personal information. We take this incident seriously, and write to provide you with information about the incident, steps we are taking in response, and steps you can take to better protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so.

**What Happened?** On January 11, 2021, ASI became aware of potential unauthorized access to our network. ASI immediately began an investigation, aided by third-party forensic specialists, to determine the nature and scope of the event. On January 29, 2021, ASI confirmed that folders on our systems may have been accessed or removed from our systems without authorization. We therefore undertook a time-intensive, thorough review of the potentially impacted folders and our internal files and systems in order to identify the information that was potentially impacted and to whom it related. On February 25, 2021, we determined that one or more of the folders contained personal information. ASI then undertook a diligent review of our internal files to identify accurate address information, which was completed on March 23, 2021. We thereafter worked to provide notification to potentially impacted individuals as quickly as possible.

**What Information Was Involved?** This event involves potential unauthorized access to or acquisition of certain ASI folders that may contain personal information relating to present and past employees and/or customers <<b2b\_text\_1(EntityName)>>. As a result of our investigation, we determined that the information related to you that may have been accessed without authorization includes <<b2b\_text\_2(ImpactedData)>>.

**What We Are Doing.** We take this incident and the security of your personal information seriously. ASI quickly moved to investigate and respond to the event, including taking steps to mitigate the event by resetting passwords across its network and bringing in third-party forensic specialists to assist with the investigation and remediation. We also took several actions to enhance our security policies, procedures, and infrastructure. Further, we notified law enforcement of this event, and have been cooperating with their investigation. As an added precaution we are providing access to 24 months of complimentary credit monitoring services through Kroll. The offered monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. Additional details regarding the monitoring services, and instructions on activating the offered services can be found below. Please note, we are unable to activate you in these services, any activation must be completed by you.

**What You Can Do.** You can activate to receive the complimentary credit monitoring services that we are offering to you. To do so, please follow instructions provided in the enclosed “Steps You Can Take to Help Protect Your Information.”

**For More Information.** We understand that you may have questions that are not addressed in this notice. If you have additional questions or concerns, please call our dedicated call center at [1-XXX-XXX-XXXX](tel:1-XXX-XXX-XXXX), which is available Monday through Friday, from 8:00 a.m. to 5:30 p.m. Central Time.

We sincerely regret any inconvenience or concern this incident causes you.

Sincerely,



Baile Hennes



Doug Clingman  
Ag Solutions IT, LLC

## Steps You Can Take to Help Protect Your Information

### **Activate the Complimentary Credit Monitoring Services**

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide credit monitoring at no cost to you for two years. 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. To activate:

Visit <<IDMonitoringURL>> to activate and take advantage of your credit monitoring services.

*You have until <<Date>> to activate your identity monitoring services.*

Membership Number: <<Member ID>>

### **ADDITIONAL DETAIL REGARDING YOUR 24 MONTH COMPLIMENTARY IDENTITY MONITORING SERVICES**

#### **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'll 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.

#### **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.

### **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](http://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, military identification, 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 fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
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**

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](http://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](mailto: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](http://www.oag.state.md.us). ASI is located at 2803 N. Nebraska Avenue York, Nebraska 68467.

*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](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.

*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](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](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. There are approximately # [Rhode Island residents](#) impacted by this incident.