



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

Paul T. McGurkin, Jr.  
Office: (267) 930-4788  
Fax: (267) 930-4771  
Email: pmcgurkin@mullen.law

426 W. Lancaster Avenue, Suite 200  
Devon, PA 19333

May 28, 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

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent USA Waste-Management Resources, LLC located at 800 Capitol Street, Suite 3000, Houston, Texas 77002 and are writing to notify your office of an incident that may affect the security of personal information related to one thousand six hundred forty-three (1,643) Iowa residents. The investigation of this matter is ongoing and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, WM<sup>1</sup> 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 January 21, 2021, WM discovered suspicious activity on its network and immediately launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the activity and contacted the FBI. The investigation determined that an unauthorized actor entered WM's environment between January 21 and 23, 2021, accessed certain files, and took a limited number of files. Therefore, WM conducted an extensive review process to analyze the contents of the files potentially accessed to determine what, if any, sensitive information was contained within them. On May 4, 2021 and in the weeks following, WM determined that the potentially compromised files contained the protected information of certain individuals. The

---

<sup>1</sup> References herein to "WM" include USA Waste-Management Resources, LLC and certain affiliates, as applicable.

information for Iowa residents that could have been subject to unauthorized access includes name, Social Security number or National ID, date of birth and driver's license numbers. WM does not currently have evidence that the files containing personal information were actually taken by the unauthorized actor.

### **Notice to Iowa Residents**

On May 28, 2021, USA Waste-Management Resources, LLC began providing written notice of this incident to impacted individuals which includes one thousand six hundred forty-three (1,643) Iowa residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

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

Upon discovering the event, WM moved quickly to investigate, assess the security of its systems, and notify impacted individuals. WM also worked to implement additional safeguards. WM is providing individuals whose personal information was potentially affected by this incident with access to one (1) year of credit monitoring services through Experian at no cost to the individuals.

WM also contacted a third-party, who assisted with identifying locations for the impacted individuals and who gathered relevant contact information into a consistent format for notification. This investigation was a time-consuming process, but WM believed it was necessary to ensure appropriate precautions and that next steps were taken.

Additionally, USA Waste-Management Resources, LLC 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. USA Waste-Management Resources, LLC is also 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, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Lastly, USA Waste-Management Resources, LLC is notifying regulators as required.

Office of the Attorney General of Iowa

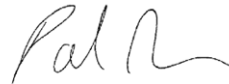
May 28, 2021

Page 3

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4788.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul R.", written in a cursive style.

Paul T. McGurkin, Jr. of  
MULLEN COUGHLIN LLC

PTM/pls  
Enclosure

# **EXHIBIT A**



May 28, 2021

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

## NOTICE OF DATA BREACH

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

USA Waste-Management Resources, LLC (“Waste Management Resources”) writes to notify you of an incident that may affect some of your information as <<b2b\_text\_1(an employee/ a former employee / a dependent of a current or former employee)>> of Waste Management Resources or one of its affiliates. We take this incident seriously, and this letter provides details of the incident, our response, and steps you may take to better protect against possible misuse of your personal information, should you feel it appropriate to do so.

**What Happened?** On January 21, 2021, we discovered suspicious activity in our network environment. We immediately launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the activity and contacted the FBI. Our investigation determined that an unauthorized actor entered our environment between January 21 and 23, 2021, accessed certain files, and took a limited number of files. Therefore, we conducted an extensive review process to analyze the contents of the files potentially accessed to determine what, if any, sensitive information was contained within them. On May 4, 2021 and in the weeks following, we determined that the potentially accessed files contained sensitive information of certain individuals, including you. However, we do not currently have evidence that the files containing your personal information were actually taken by the unauthorized actor. Our investigation remains ongoing, but we wanted to notify you as soon as possible.

**What Information Was Involved?** We determined that the following information related to you may have been present in the files that were potentially accessed by the unauthorized actor: name, Social Security number or National ID, date of birth, and driver’s license number.

**What We Are Doing.** We take the confidentiality, privacy, and security of information in our care seriously. Upon discovery, we immediately commenced an investigation to confirm the nature and scope of the incident. While the investigation remains ongoing, we are taking steps now to implement additional safeguards and review policies and procedures relating to data privacy and security.

We are providing you with access to 12 months of credit monitoring and identity protection services through Experian at no cost to you. A description of services and instructions on how to enroll can be found within the enclosed Steps You Can Take to Protect Personal Information. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services on your behalf.

**What You Can Do.** Please review the enclosed *Steps You Can Take to Protect Personal Information*. You can also enroll to receive the complimentary credit monitoring and identity protection services through Experian. We also encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity.

**For More Information.** We understand you may have questions about this incident that are not addressed in this letter. Should you have additional questions, please contact the call center we set up to respond to this event at 1-855-537-2102 8:00 am to 5:30 pm Central Time, Monday through Friday excluding major US holidays.

The privacy and security of your information is important to us, and we sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Oates-Forney', written in a cursive style.

Tamla Oates-Forney  
Senior Vice President and Chief People Officer

**Translation of Letter**

If you would like to receive a copy of the letter in Spanish or French, please contact the call center at 1-855-537-2102. Si desea recibir una copia de la carta en Español, comuníquese con el centro de llamadas al 1-855-537-2102. Si vous voulez recevoir une copie de la lettre en français, veuillez communiquer avec le centre d'appels au 1-855-537-2102.

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### **Enroll in Credit Monitoring**

To help protect your identity, we are offering a complimentary one-year membership of Experian IdentityWorks<sup>SM</sup> 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\_2(EnrollmentDeadline)>> (Your code will not work after this date.)
2. VISIT the Experian IdentityWorks website to enroll: [URL]
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\_3(EngagementNumber)>> as proof of eligibility for the identity restoration services by Experian.

### **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, 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:

<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).

*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 \[#\] Rhode Island residents impacted by this incident.](#)