



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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

June 23, 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 Asset Marketing Services, LLC d/b/a GovMint.com (“AMS”) located at 14101 Southcross Drive West, Suite #175, Burnsville, MN 55337, and are writing to notify your office of an incident that may affect the security of some personal information relating to five hundred four (504) Iowa residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, AMS 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 May 3, 2021, GovMint.com discovered an unusual code on a platform that was taking customer data off the order entry page when customers were placing web orders on the website. GovMint.com immediately launched an investigation to determine the nature and scope of the event, and to identify any possible misuse, access or theft of data. Through our investigation, we determined that the unknown actor gained unauthorized access to portions of www.govmint.com between May 21, 2020 and May 3, 2021. The investigation determined that certain credit cards entered into this website may have been viewed or exfiltrated by the unknown actor. AMS then worked to perform a comprehensive review of all information potentially impacted to determine what personal information was contained in the systems and to whom the information related.

Upon completion of their review, AMS then conducted a manual review of their records to determine the identities and contact information for potentially impacted individuals. On May 26, 2021, AMS Holdings confirmed accurate and complete address information for affected individuals to provide notifications.

The information that could have been subject to unauthorized access includes individuals name, address, and credit card information.

Notice to Iowa Residents

On or about June 23, 2021, AMS began providing written notice of this incident to affected individuals, which includes five hundred four (504) Iowa residents. Written notice is being 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, AMS moved quickly to investigate and respond to the incident, assess the security of AMS systems, and notify potentially affected individuals. AMS is also working to implement additional safeguards. Further, AMS is providing access to credit monitoring services for 12 months, through Epiq, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, AMS is providing impacted individuals with guidance on how to better protect against identity theft and fraud. AMS 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) 930-6836.

Very truly yours,



Carolyn Purwin Ryan of
MULLEN COUGHLIN LLC

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
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<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

<<Variable Header>>

Dear <<Name 1>>,

Asset Marketing Services, LLC d/b/a GovMint.com (“GovMint.com”) writes to inform you of an incident that may affect the privacy of some of your personal information. While we have no evidence of actual or attempted misuse of your information, we wanted to provide you with information about the incident, steps we are taking in response, and steps you may take to better protect your information, should you feel it is appropriate to do so. Please know we take this incident very seriously and have been working diligently to investigate and respond.

What Happened? On or about May 3, 2021, GovMint.com discovered an unusual code on a platform that was taking customer data off the order entry page when customers were placing web orders on the website. GovMint.com immediately launched an investigation to determine the nature and scope of the event, and to identify any possible misuse, access or theft of data. Through our investigation, we determined that the unknown actor gained unauthorized access to portions of www.govmint.com between May 21, 2020 and May 3, 2021. The investigation determined that certain credit cards entered into this website may have been viewed or exfiltrated by the unknown actor.

We then worked to perform a comprehensive review of all information potentially impacted to determine what personal information was contained in the systems and to whom the information related. Upon completion of our review, we conducted a manual review of our records to determine the identities and contact information for potentially impacted individuals. On May 26, 2021, we confirmed accurate and complete address information for affected individuals to provide notifications.

What Information Was Involved? Our investigation determined that this information may include your credit card information and name. Again, we have no evidence of any actual or attempted misuse of your information; rather, we are letting you know in an abundance of caution and providing information and resources to assist you in protecting your personal information, should you feel it appropriate to do so.

What We Are Doing. We take this incident and the security of personal information in our care very seriously. We have security measures in place to protect the data on our systems and we continue to assess and update security measures for information in our care. We also notified law enforcement and are notifying regulatory authorities, as required by law.

As an added precaution, we are also offering you access to 12 months of identity monitoring services through TransUnion at no cost to you. These services include credit monitoring, fraud consultation, and identity theft restoration. If you wish to activate TransUnion’s identity monitoring services, you may follow the instructions included in the *Steps You Can Take to Protect Your Information*.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and free credit reports for suspicious activity and to detect errors. We encourage you to enroll in the credit monitoring and identity restoration services through TransUnion. Please also review the enclosed *Steps You Can Take to Protect Your Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call us at <<Variable Call Center>>. You may also write to GovMint.com at 14101 Southcross Drive West, Suite 175, Burnsville, MN 55337.

Again, please know we take this incident very seriously and have been working diligently to investigate and respond. We sincerely regret any inconvenience or concern this incident may have caused.

Sincerely,

Bill Gale
CEO
GovMint.com

Steps You Can Take to Protect Your Information

Enroll in Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for one year provided by TransUnion Interactive, a subsidiary of TransUnion,[®] one of the three nationwide credit reporting companies.

How to Enroll: You can sign up online or via U.S. mail delivery

- To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <<Insert static 6-digit Telephone Pass Code>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.
- You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

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, 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:

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

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: 400 6th St. NW 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.

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; 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 181 Rhode Island residents impacted by this incident.

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 violators. 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>.



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

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Dear <<Name 1>>,

Asset Marketing Services, LLC d/b/a GovMint.com (“GovMint.com”) writes to inform you of an incident that may affect the privacy of some of your personal information. It’s important to note that we have no evidence of actual or attempted misuse of your information, but we wanted to provide you with information about the incident, steps we are taking in response to secure our systems now and in the future, and steps you may take to better protect your information, should you feel it is appropriate to do so. Please know we take this incident very seriously and have been working diligently to investigate and respond.

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What Information Was Involved? Our investigation determined that this information may include your credit card information and name. Again, we have no evidence of any actual or attempted misuse of your information; rather, we are letting you know in an abundance of caution and are providing information and resources to assist you in protecting your personal information, should you feel it appropriate to do so. The compromised data related only to web order entry information; therefore, customer purchase history, prior purchases and orders placed through your sales representative were not impacted.

What We Are Doing. Please be assured that we take this incident and the security of personal information in our care very seriously. We have security measures in place to protect the data on our systems and we continue to assess and update security measures for information in our care. As a result of this incident, we increased the frequency of our patching updates, hired experts to enhance our cybersecurity response and detection, installed additional firewalls, implemented additional limits to mitigate further risk, and upgraded software and hardware on all firewalls and malware scanning programs across all servers and desktops. We also notified law enforcement and are notifying regulatory authorities, as required by law.

As an added precaution, we are also offering you access to 12 months of identity monitoring services through TransUnion at no cost to you. These services include credit monitoring, fraud consultation, and identity theft restoration. If you wish to activate TransUnion’s identity monitoring services, you may follow the instructions included in the *Steps You Can Take to Protect Your Information*.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and free credit reports for suspicious activity and to detect errors. We encourage you to enroll in the credit monitoring and identity restoration services through TransUnion. Please also review the enclosed *Steps You Can Take to Protect Your Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter and we would be happy to discuss on a call. If you have additional questions, please call us at <<Variable Call Center>>. You may also write to GovMint.com at 14101 Southcross Drive West, Suite 175, Burnsville, MN 55337.

Again, please know we take this incident very seriously and have been working diligently to investigate and respond. We sincerely regret any inconvenience or concern this incident may have caused.

Sincerely,

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How to Enroll: You can sign up online or via U.S. mail delivery

- To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422. When prompted, enter the six-digit telephone passcode <<Insert static 6-digit Telephone Pass Code>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.
- You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

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1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
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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

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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; 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 181 Rhode Island residents impacted by this incident.

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 violators. 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>.