June 29, 2021

Robert Walker
601.499.8083 (direct)
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Via electronic-mail: *consumer@ag.iowa.gov*

Attorney General Tom Miller
Office of the Attorney General
Consumer Protection Division
1305 E. Walnut Street
Des Moines, IA 50319

Re:	**Our Client**	**:**	**Wolfe Clinic, P.C.**
	Matter	**:**	**Data Security Incident on February 8, 2021**
	Wilson Elser File #	**:**	**16516.01329**

Dear Attorney General Miller:

We represent Wolfe Clinic, P.C. ("Wolfe Eye Clinic") headquartered in Marshalltown, Iowa, with respect to a potential data security incident described in more detail below. Wolfe Eye Clinic takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, what information has been compromised, and the steps that Wolfe Eye Clinic is taking to secure the integrity of its systems. We have also enclosed hereto samples of the notifications made to the potentially impacted individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

Wolfe Eye Clinic is a network of eye care clinics providing eye care to patients across Iowa. On February 8, 2021, Wolfe Eye Clinic was the target of a cybersecurity attack that involved an unauthorized third party attempting to infiltrate Wolfe Eye Clinic's computer network, lock out Wolfe Eye Clinic, and then demand a ransom payment.

Upon detecting this incident, Wolfe Eye Clinic moved quickly to secure its network environment and launched a thorough investigation. The investigation was performed with the help of independent IT security and forensic investigators to determine the scope and extent of the potential unauthorized access to Wolfe Eye Clinic's systems and any sensitive information. Given the complexity and scale of the cyberattack detected, the full scope of information potentially impacted was not fully realized until May 28, 2021.

After the comprehensive forensic investigation into this incident concluded on June 8, 2021, Wolfe Eye Clinic discovered that individuals' name, mailing address, date of birth, Social Security number, and/or protected medical and health information may have been exposed. Wolfe Eye

Clinic has had no reports of related identity theft as a result of this incident (February 8, 2021 to present).

2. Steps Taken

Wolfe Eye Clinic takes the security of all information in its control very seriously. Given this, Wolfe Eye Clinic is taking steps to prevent a similar event from occurring in the future by implementing additional safeguards and enhanced security measures to better protect the privacy and security of information in its systems. Wolfe Eye Clinic has also reviewed and taken steps to enhance its policies and procedures relating to the security of its systems and servers, as well as its information life cycle management.

Wolfe Eye Clinic values the safety of its patients' personal information and is therefore offering credit monitoring and identity theft protection services through IDX. IDX's services include: At least 12 months of credit monitoring and fully managed identity theft recovery services. With this protection, IDX will help the affected individuals resolve issues if their identity is compromised.

3. Contact Information

Wolfe Clinic remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Robert.Walker@WilsonElser.com or 601.499.8083.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Robert Walker, Esq.
RW/tj

Copy: Tawana B. Johnson, Esq. (Wilson Elser, LLP)

Enclosures: *Sample Notification Letters*

C/O IDX
P.O. Box 989728
West Sacramento, CA 95798-9728

To enroll, please call: 833-909-3906

Or visit: https://response.idx.us/wolfe

Enrollment code: <<ENROLLMENT>>

June 29, 2021

Via First-Class Mail

The Estate of <<FIRST NAME>> <<LAST NAME>>
<<ADDRESS1>>
<<ADDRESS2>>
<<CITY>>, <<STATE>> <<ZIP>>

Notice of Data Breach

To the Estate of <<FIRST NAME>> <<LAST NAME>>,

We are writing to inform you of a data security incident involving Wolfe Clinic, P.C. ("Wolfe Eye Clinic") that may have resulted in the unauthorized access of the decedent's personal information to unauthorized parties. We take the privacy and protection of patient information very seriously, so we sincerely apologize and regret any inconvenience this incident may cause.

What Happened

On February 8, 2021, Wolfe Eye Clinic was the target of a cybersecurity attack that involved an unauthorized third party attempting to gain access to our computer network. Upon detecting this incident, we moved quickly to secure our network environment and launched a thorough investigation. The investigation was performed with the help of independent IT security and forensic investigators to determine the scope and extent of the potential unauthorized access to our systems and any sensitive information. Given the complexity and scale of the cyberattack detected, the full scope of information potentially impacted was not fully realized until May 28, 2021.

What Information Was Involved

After the comprehensive forensic investigation into this incident concluded on June 8, 2021, we discovered that the decedent's name, mailing address, date of birth, Social Security number, and/or protected medical and health information may have been exposed. We have had no reports of related identity theft as a result of this incident.

What We Are Doing:

We take the security of all information in our control very seriously. Given this, we are taking steps to prevent a similar event from occurring in the future by implementing additional safeguards and enhanced security measures to better protect the privacy and security of information in our systems. We have also reviewed and taken steps to enhance our policies and procedures relating to the security of our systems and servers, as well as our information life cycle management.

We value the safety of the decedent's personal information. Therefore, we are offering free credit monitoring and identity theft protection services through IDX. These services include <<Data Variable - 12/24>> months of credit and CyberScan monitoring, a $1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve any issues if the decedent's identity is compromised.

What You Can Do:

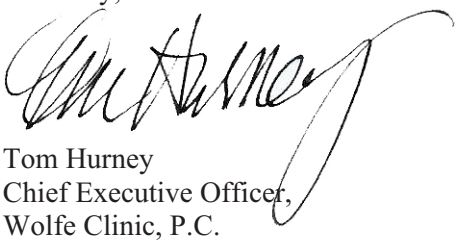
We encourage you to contact IDX with any questions and enroll in free IDX services by calling 833-909-3906 or going to https://response.idx.us/wolfe and using the Enrollment Code provided above. IDX is available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is September 29, 2021.

IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of the decedent's personal information.

Enclosed, you will find additional information regarding the resources available to you, and the steps you can take to further protect the decedent's personal information.

Wolfe Eye Clinic values the security of our patients' personal data, and we apologize for any inconvenience this incident has caused.

Sincerely,



Tom Hurney
Chief Executive Officer,
Wolfe Clinic, P.C.

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at https://www.consumer.ftc.gov/articles/0155-free-credit-reports) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze	**Experian Security Freeze**	**TransUnion Security Freeze**
P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (https://www.transunion.com/fraud-alerts); or
- Experian (https://www.experian.com/fraud/center.html).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and 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 agencies 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

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

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.

C/O IDX
P.O. Box 989728
West Sacramento, CA 95798-9728

To enroll, please call: 833-909-3906

Or visit: https://response.idx.us/wolfe

Enrollment code: <<ENROLLMENT>>

June 29, 2021

Via First-Class Mail

<<FIRST NAME>> <<LAST NAME>>
<<ADDRESS1>>
<<ADDRESS2>>
<<CITY>>, <<STATE>> <<ZIP>>

Notice of Data Breach

Dear <<FIRST NAME>> <<LAST NAME>>,

We are writing to inform you of a data security incident involving Wolfe Clinic, P.C. ("Wolfe Eye Clinic") that may have resulted in the unauthorized access of your personal information. We take the privacy and protection of patient information very seriously, so we sincerely apologize and regret any inconvenience this incident may cause.

What Happened

On February 8, 2021, Wolfe Eye Clinic was the target of a cybersecurity attack that involved an unauthorized third party attempting to gain access to our computer network. Upon detecting this incident, we moved quickly to secure our network environment and launched a thorough investigation. The investigation was performed with the help of independent IT security and forensic investigators to determine the scope and extent of the potential unauthorized access to our systems and any sensitive information. Given the complexity and scale of the cyberattack detected, the full scope of information potentially impacted was not fully realized until May 28, 2021.

What Information Was Involved

After the comprehensive forensic investigation into this incident concluded on June 8, 2021, we discovered that your name, mailing address, date of birth, Social Security number, and/or protected medical and health information may have been exposed. We have had no reports of related identity theft as a result of this incident.

What We Are Doing

We take the security of all information in our control very seriously. Given this, we are taking steps to prevent a similar event from occurring in the future by implementing additional safeguards and enhanced security measures to better protect the privacy and security of information in our systems. We have also reviewed and taken steps to enhance our policies and procedures relating to the security of our systems and servers, as well as our information life cycle management.

What You Can Do

We are offering you credit monitoring and identity theft protection services through IDX. These services include <<Data Variable - 12/24>> months of credit monitoring, as well as fully managed identity theft recovery services. With this protection, IDX will help you resolve any issues if your identity is compromised.

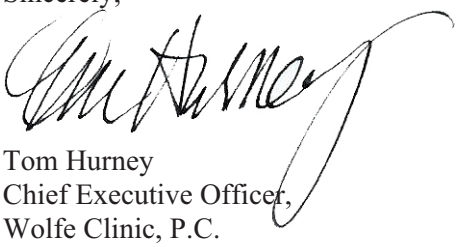
We encourage you to contact IDX with any questions and enroll in free IDX services by calling 833-909-3906 or going to https://response.idx.us/wolfe and using the Enrollment Code provided above. IDX is available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is September 29, 2021.

IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

Enclosed, you will find additional information regarding the resources available to you, and the steps you can take to further protect your personal information.

Wolfe Eye Clinic values the security of your personal data, and we apologize for any inconvenience this incident has caused.

Sincerely,



Tom Hurney
Chief Executive Officer,
Wolfe Clinic, P.C.

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at https://www.consumer.ftc.gov/articles/0155-free-credit-reports) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze	**Experian Security Freeze**	**TransUnion Security Freeze**
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Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

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A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and 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 agencies 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

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

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.

C/O IDX
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To enroll, please call: 833-909-3906

Or visit: https://response.idx.us/wolfe

Enrollment code: <<ENROLLMENT>>

June 29, 2021

Via First-Class Mail

Parent or Guardian of <<FIRST NAME>> <<LAST NAME>>
<<ADDRESS1>>
<<ADDRESS2>>
<<CITY>>, <<STATE>> <<ZIP>>

Notice of Data Breach

Dear Parent or Guardian of <<FIRST NAME>> <<LAST NAME>>,

We are writing to inform you of a data security incident involving Wolfe Clinic, P.C. ("Wolfe Eye Clinic") that may have resulted in the unauthorized access of your child's personal information. We take the privacy and protection of patient information very seriously, so we sincerely apologize and regret any inconvenience this incident may cause.

What Happened

On February 8, 2021, Wolfe Eye Clinic was the target of a cybersecurity attack that involved an unauthorized third party attempting to gain access to our computer network. Upon detecting this incident, we moved quickly to secure our network environment and launched a thorough investigation. The investigation was performed with the help of independent IT security and forensic investigators to determine the scope and extent of the potential unauthorized access to our systems and any sensitive information. Given the complexity and scale of the cyberattack detected, the full scope of information potentially impacted was not fully realized until May 28, 2021.

What Information Was Involved

After the comprehensive forensic investigation into this incident concluded on June 8, 2021, we discovered that your child's name, mailing address, date of birth, Social Security number, and/or protected medical and health information may have been exposed. We have had no reports of related identity theft as a result of this incident.

What We Are Doing

We take the security of all information in our control very seriously. Given this, we are taking steps to prevent a similar event from occurring in the future by implementing additional safeguards and enhanced security measures to better protect the privacy and security of information in our systems. We have also reviewed and taken steps to enhance our policies and procedures relating to the security of our systems and servers, as well as our information life cycle management.

We value the safety of your child's personal information. Therefore, we are offering identity theft protection services through IDX. These services include <<Data Variable - 12/24>> months of CyberScan monitoring, a $1,000,000 insurance reimbursement, as well as fully managed identity theft recovery services. With this protection, IDX will help you resolve any issues if your child's identity is compromised.

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Wolfe Eye Clinic values the security of your child's personal data, and we apologize for any inconvenience this incident has caused.

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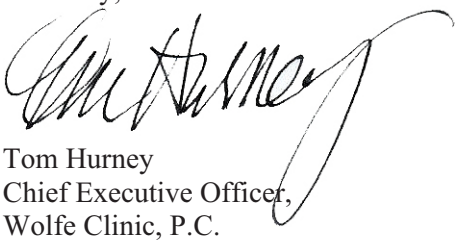

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Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

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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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and 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 agencies 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

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

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.