



MULLEN  
COUGHLIN<sup>LLC</sup>  
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July 15, 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 Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein”) located at 1100 New York Avenue NW, Suite 500, Washington, DC 20005, and are writing to notify your office of an incident that may affect the security of some personal information relating to seven hundred sixty four (764) Iowa residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Cohen Milstein 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 23, 2021, Cohen Milstein discovered unusual activity on certain computer systems. Cohen Milstein quickly disconnected the systems from the network and commenced an investigation that included working with third-party forensic specialists. The investigation determined that the Cohen Milstein’s systems were subject to unauthorized access by someone not connected with Cohen Milstein on January 23, 2021.

Because Cohen Milstein could not conclusively rule out access to data within these systems, Cohen Milstein initiated an exhaustive review of its systems to identify potentially impacted data and determine the type of information and to whom it related. The initial review concluded on May 4, 2021 and Cohen Milstein continued working through June 24, 2021 to identify and populate addresses information for any potentially affected individuals.

The information that could have been subject to unauthorized access includes name, address, Social Security Number, medical information (which may include diagnostic and treatment information).

### **Notice to Iowa Residents**

On or about July 15, 2021, Cohen Milstein began providing written notice of this incident to affected individuals, which includes seven hundred sixty four (764) 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, Cohen Milstein moved quickly to investigate and respond to the incident, assess the security of Cohen Milstein systems, and notify potentially affected individuals. Cohen Milstein is also working to implement additional safeguards and training to its employees. Cohen Milstein is providing access to triple bureau credit monitoring services for twenty four (24) months, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Cohen Milstein is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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.

Office of the Attorney General of Iowa

July 15, 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) 930-2190.

Very truly yours,

A handwritten signature in black ink, appearing to read 'K. M.', with a long horizontal flourish extending to the right.

Kevin M. Mekler of  
MULLEN COUGHLIN LLC

KMK/mep

# EXHIBIT A

# COHENMILSTEIN

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

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

<<Variable Header>>

Dear <<Name 1>>:

Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein”) writes to tell you about an incident that may involve some of your information. This notice provides you with information about the incident, our response, and steps you may take to protect your information, should you feel it is appropriate to do so.

**What Happened?** On January 23, 2021, Cohen Milstein discovered unusual activity on certain computer systems. Cohen Milstein quickly disconnected the systems from the network and commenced an investigation that included working with third-party forensic specialists. The investigation determined that Cohen Milstein’s systems were subject to unauthorized access by someone not connected with Cohen Milstein on January 23, 2021. We are providing you with this notification out of an abundance of caution because your information was determined to be present in the systems that may have been accessed during the incident.

Because we could not conclusively rule out access to data within these systems, Cohen Milstein initiated an exhaustive review of its systems to identify potentially impacted data and determine the type of information and to whom it related. The initial review concluded on May 4, 2021 and Cohen Milstein continued working through June 24, 2021 to identify and populate address information for any potentially affected individuals.

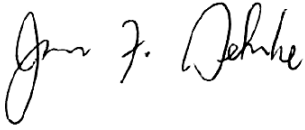
**What Information Was Involved?** The involved Cohen Milstein systems contained your name and the following types of information relating to you: <<Data Elements>>.

**What We Are Doing.** We take this incident seriously. Information privacy and security are among our highest priorities, and we have strict security measures in place to protect information in our care. Upon discovering this incident, we quickly took steps to investigate and respond, including reviewing and enhancing our existing policies and procedures to reduce the likelihood of a similar future event. Cohen Milstein is notifying individuals and relevant regulators as required. Moreover, as an added precaution, Cohen Milstein is offering complimentary access to twenty-four (24) months of credit monitoring and identity restoration services to potentially impacted individuals.

**What You Can Do.** Cohen Milstein encourages you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and explanation of benefits and monitoring your free credit reports for suspicious activity. You may also review and consider the information and resources outlined in the below “Steps You Can Take to Help Protect Personal Information.”

**For More Information.** If you have additional questions, please call our dedicated assistance line at 855-535-1837 (toll free), Monday through Friday, from 9:00 a.m. to 9:00 p.m. Eastern Time (excluding U.S. holidays). You may write to Cohen Milstein at ATTN: James Gehrke, 1100 New York Avenue NW, Suite 500, Washington, DC 20005 with any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "James Gehrke". The signature is fluid and cursive, with the first name "James" and last name "Gehrke" clearly distinguishable.

James Gehrke  
Executive Director  
Cohen Milstein Sellers & Toll PLLC

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

### Enroll in Credit Monitoring and Identity Restoration Services



Enter your Activation Code: <<Activation Code>>  
Enrollment Deadline: <<Enrollment Deadline>>

### Equifax Complete™ Premier

\*Note: You must be over age 18 with a credit file to take advantage of the product

### Key Features

- Annual access to your 3-bureau credit report and VantageScore<sup>1</sup> credit scores
- Daily access to your Equifax credit report and 1-bureau VantageScore credit score
- 3-bureau credit monitoring<sup>2</sup> with email notifications of key changes to your credit reports
- WebScan notifications<sup>3</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>4</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>5</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>6</sup>.
- Lost Wallet Assistance if your wallet is lost or stolen, and one-stop assistance in canceling and reissuing credit, debit and personal identification cards.

### Enrollment Instructions

Go to [www.equifax.com/activate](http://www.equifax.com/activate).

Enter your unique Activation Code of <<Activation Code>> then click “Submit” and follow these 4 steps:

1. **Register:**  
Complete the form with your contact information and click “Continue”.  
*If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.  
Once you have successfully signed in, you will skip to the Checkout Page in Step 4*
  2. **Create Account:**  
Enter your email address, create a password, and accept the terms of use.
  3. **Verify Identity:**  
To enroll in your product, we will ask you to complete our identity verification process.
  4. **Checkout:**  
Upon successful verification of your identity, you will see the Checkout Page.  
Click ‘Sign Me Up’ to finish enrolling.
- You’re done!**  
The confirmation page shows your completed enrollment.  
Click “View My Product” to access the product features.

*1 The credit scores provided are based on the VantageScore® 3.0 model. For three-bureau VantageScore credit scores, data from Equifax®, Experian®, and TransUnion® are used respectively. Any one-bureau VantageScore uses Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.*

*2 Credit monitoring from Experian and TransUnion will take several days to begin.*

*3 WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers’ personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers’ personal information is at risk of being traded.*

*4 The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.*

*5 Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer’s identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit [www.optoutprescreen.com](http://www.optoutprescreen.com).*

*6 The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.*

**To sign up for US Mail delivery, dial 1-855-833-9162 for access to the Equifax Credit Watch Gold with 3-in-1 Credit Monitoring automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.**

**1. Activation Code:** You will be asked to enter your Activation Code provided above.

**2. Customer Information:** You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.

**3. Permissible Purpose:** You will be asked to provide Equifax with your permission to access your credit file and to monitor your file. Without your agreement, Equifax cannot process your enrollment.

**4. Order Confirmation:** Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity can not be verified using the information provided). Please allow up to 10 business days to receive this information.

**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 credit 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 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**

As a general best practice, if you reuse usernames and passwords for other online accounts, it is recommended that you change the password and any security question or answer for those online accounts. Further, as a general precaution, you should never use the same password for more than one online account. When creating passwords, they should be complex and not contain personal 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: 400 6th St NW, Washington, DC 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). Cohen Milstein is located at 1100 New York Avenue NW, Suite 500, Washington, DC 20005.

*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 172 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](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/>.