



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

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August 25, 2023

**VIA E-MAIL**

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

**Re: Notice of Data Event**

To Whom It May Concern:

We represent PurFoods, LLC (“PurFoods”) dba Mom’s Meals located at 3210 SE Corporate Woods Dr., Ankeny, Iowa, 50021, and are writing to notify your office on behalf of Purfoods and any applicable covered entity partners of an incident that may involve certain personal information relating to nineteen thousand one hundred ninety-eight (19,198) Iowa residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, PurFoods 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**

Upon identifying suspicious account behavior on February 22, 2023, PurFoods launched an investigation with the help of third-party specialists. The investigation determined that PurFoods experienced a cyberattack between January 16, 2023, and February 22, 2023, that included the encryption of certain files in its network. Because the investigation also identified the presence of tools that could be used for data exfiltration, PurFoods was not able to rule out the possibility that data was taken from one of its file servers. Third-party specialists helped PurFoods conduct a review of the potentially involved data, which concluded on July 10, 2023, and determined that the files at issue included personal and protected health information related to certain individuals. The information that could have been subject to unauthorized access includes name, Social Security number, driver’s license/state identification number, financial account and/or payment card information, medical information, health information, and date of birth.

### **Notice to Iowa Residents**

On or about August 25, 2023, PurFoods began providing written notice of this incident to approximately nineteen thousand one hundred ninety-eight (19,198) 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, PurFoods moved quickly to investigate and respond to the incident, assess the security of PurFoods systems, and identify potentially affected individuals. Further, PurFoods notified federal law enforcement regarding the event. PurFoods is also working to implement additional safeguards and training to its employees. PurFoods is providing access to credit monitoring services for twelve (12) months, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

PurFoods is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion. PurFoods is also notifying the U.S. Department of Health and Human Services and prominent media pursuant to the Health Insurance Portability and Accountability Act (HIPAA).

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4786.

Very truly yours,



Ryan C. Loughlin of  
MULLEN COUGHLIN LLC

# **EXHIBIT A**



<<Date>> (Format: Month Day, Year)

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

Dear <<first\_name>>:

As part of our vital mission of improving life through better nutrition at home, PurFoods, LLC [doing business as Mom's Meals ("PurFoods")] may have provided you with one or more meal(s). We are writing to notify you of a recent event that may involve some of your personal information, as well as our response to the event and steps you can take to help protect that information, should you feel it appropriate to do so.

**What Happened?** Upon identifying suspicious account behavior on February 22, 2023, we launched an investigation with the help of third-party specialists. The investigation determined that we experienced a cyberattack between January 16, 2023, and February 22, 2023, that included the encryption of certain files in our network. Because the investigation also identified the presence of tools that could be used for data exfiltration (the unauthorized transfer of data), we are not able to rule out the possibility that data was taken from one of our file servers.

**What Information Was Involved?** Third-party specialists have helped us conduct a review of the potentially involved data, which concluded on July 10, 2023, and determined that the files at issue included <<b2b\_text\_2 ("name" and Data Elements)>>.

It's important to note that we have seen no evidence that any personal information was misused or further disclosed as a result of the cyberattack.

**What We Are Doing.** We have notified Federal law enforcement of this event and cooperated with their subsequent investigation. Further, because safeguarding the privacy of information in our care is one of our highest priorities, we have taken a number of steps to further strengthen our network security. We also are reviewing our existing policies and procedures to identify additional measures and safeguards

**What You Can Do.** We encourage you to be watchful about potential identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity, as well as by reading the attached *Steps You Can Take to Help Protect Personal Information*. Though we are not aware of any actual or attempted misuse of your personal information, as an added precaution, we have arranged to offer you access to 12 months of complimentary credit monitoring and identity restoration services provided through Kroll. We are unable to activate you directly, but we have included activation instructions in the attached *Steps You Can Take to Help Protect Personal Information*.

**For More Information.** We are sorry for any inconvenience this incident may cause. If you have additional questions, please call us at (866) 676-4045, Monday through Friday, from 8:00 a.m. to 5:30 p.m. Central Time (excluding major U.S. holidays). You may also write to PurFoods, LLC at 3210 SE Corporate Woods Drive, Ankeny, IA 50021.

Sincerely,

Jane Sturtz  
Privacy Officer

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

To help relieve concerns and restore confidence following this incident, PurFoods has secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until **<<b2b\_text\_6 (activation date)>>** to activate your identity monitoring services.

Membership Number: **<<Membership Number s\_n>>**

For more information about Kroll and your Identity Monitoring services, you can visit [info.krollmonitoring.com](http://info.krollmonitoring.com).

Additional information describing your services is included with this letter.

### **Examine Insurance Correspondence**

Because the personal information in question may have included your health insurance member identification number, we encourage you to carefully review explanations of benefits (EOBs) and other correspondence from your insurer to ensure you actually received the services. If not, you can contact your insurance company's customer service line to report any discrepancies.

### **How to Monitor Your Accounts**

Under U.S. law, you are 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.

### **Freezes and Fraud Alerts**

You also have the right to place a "credit freeze," at no cost to you, on your credit report, which will prohibit a credit bureau from releasing information in your credit report without your express authorization. This is designed to prevent credit, loans, and services from being approved in your name without your consent, and you can lift the freeze at any time. While credit is frozen, however, approvals for new loans, credit cards, mortgages, or other accounts involving the extension of credit could be delayed. 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.

As an alternative to a credit freeze, you also can place either an initial or extended "fraud alert" on your credit report, also at no cost. An initial fraud alert is a 1-year alert that is placed on a credit file. Upon seeing a fraud alert display, a business is required to take steps to verify your identity before extending new credit. If you are a victim of identity theft, you are entitled to a seven-year extended fraud alert lasting seven years.

To learn more about credit freezes and fraud alerts, please visit the Federal Trade Commission's website at <https://consumer.ftc.gov/articles/what-know-about-credit-freezes-fraud-alerts>. Should you wish to place a credit freeze or either type of fraud alert, please contact any one of 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	1 (800) 916-8800
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 can find more information on protecting your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint by writing them at 600 Pennsylvania Avenue NW, Washington, DC 20580; visiting [www.identitytheft.gov](http://www.identitytheft.gov); or calling 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

In addition, you have the right to file a police report if you ever experience identity theft or fraud. When filing a report with law enforcement for identity theft, you will likely be asked 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. Please note, 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 Street, 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 <https://www.marylandattorneygeneral.gov/>.

*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.](#)



## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.