



RECEIVED  
15 FEB -5 AM 10:49  
CONSUMER PROTECTION DIV.

Suite 2400  
1300 SW Fifth Avenue  
Portland, OR 97201-5610

Sean B. Hoar  
503-778-5396 tel  
503-778-5299 fax

seanhoar@dwt.com

January 31, 2015

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

Re: Data Breach Report

Dear Attorney General Miller: I represent CICS Employment Services, Inc. (CICS), an employment services company located at 2941 U.S. Highway 101, Lincoln City, Oregon 97367. This letter is being sent pursuant to Iowa Code § 715C.2 because CICS was notified by the FBI that personally identifiable information (PII) of 1,206 Iowa residents may have been accessed without authorization. The PII resided on a Newtek Technology Services server in Phoenix, Arizona, and included names, addresses, dates of birth, and Social Security numbers. The PII was obtained and processed by CICS for the purpose of conducting background checks for applicants for employment. The FBI did not disclose how or when the alleged compromise occurred and, as explained below, multiple forensic examinations revealed no evidence of a compromise. However, CICS understood the notification from the FBI as triggering its notification obligations under Iowa Code § 715C.2.

CICS is fully cooperating with the FBI, and consented to the forensic examination of relevant portions of its computer network, data base and third party storage provider. The FBI's forensic examinations revealed no evidence of any compromise. In addition to the FBI's forensic examination, CICS launched its own investigation and immediately engaged the services of an independent forensics investigation firm to determine whether CICS' security had been compromised. The forensic examinations revealed no evidence that the CICS network or database had been compromised. To ensure the security of all PII maintained by CICS, however, and due to its concerns of a vendor related breach, CICS changed web hosts and has confirmed that all PII contained in its network is encrypted and secure.

CICS is in the process of notifying all potentially affected consumers and providing them identity theft remediation and credit monitoring services through AllClear ID, as explained in the attached consumer notification letter.

The FBI Portland, Oregon point of contact for the matter is Special Agent Colt Chester, 503-460-8475. The notification was not delayed due to the law enforcement investigation.

DWT 25428288v1 0085000-004319

Anchorage  
Bellevue  
Los Angeles

New York  
Portland  
San Francisco

Seattle  
Shanghai  
Washington, D.C.

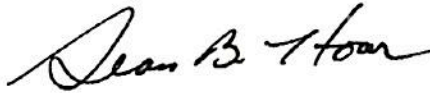
[www.dwt.com](http://www.dwt.com)

January 31, 2015  
Page 2

If your office investigates the matter, CICS will be fully cooperative and provide any information that may assist in the investigation. Should a perpetrator be identified and convicted, CICS requests the opportunity to submit a victim impact statement and a request for restitution for all costs related to the breach. Please contact me should you have any questions.

Sincerely,

Davis Wright Tremaine LLP

A handwritten signature in black ink that reads "Sean B. Hoar". The signature is written in a cursive style with a large, sweeping initial "S".

Sean B. Hoar

cc: Alex Ward, Owner  
CICS Employment Services, Inc.

# CICS

Employment Services, Inc.

Return Mail Processing Center  
PO Box 6336  
Portland, OR 97228-6336

<First Name> <Last Name>  
<Address 1>  
<Address 2>  
<City>, <State> <Zip>

<Date>

Dear <First Name> <Last Name>:

I am writing to inform you of an incident that may affect the security of your personal information. We were recently notified by the Federal Bureau of Investigation (the FBI) that personal information we processed regarding an application you made for employment may have been accessed without authorization. This information included your name, address, date of birth and Social Security number. We do not know how or when the alleged unauthorized access may have occurred. The FBI's forensic examinations of relevant portions of our computer network, database and third party storage provider revealed no evidence of any compromise. However, because of the credible nature of the alleged unauthorized access, we are taking the notification seriously and informing you. Out of an abundance of caution, and at our expense, credit monitoring services will be provided to you as explained below.

In addition to the FBI's forensic examination, we launched our own investigation into this matter. We immediately engaged the services of an independent forensics investigation firm to determine whether CICS' security had been compromised. The forensic examinations revealed no evidence that our network or database have been compromised. To ensure the security of all personally identifiable information (PII) in our database, however, and due to our concerns about it being a vendor related breach, we changed web hosts and have ensured that all PII contained in our network is encrypted and secure. The FBI's investigation into this matter is ongoing, and we are providing any assistance they might need.

As an added precaution and as a service to you, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

**AllClear SECURE:** The team at AllClear ID is ready and standing by if you need help protecting your identity. You are automatically eligible to use this service – there is no action required on your part. If a problem arises, simply call 1-855-865-4453 and a dedicated investigator will do the work to recover financial losses, restore your credit and make sure your identity is returned to its proper condition. AllClear maintains an A+ rating at the Better Business Bureau.

**AllClear PRO:** This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. To use the PRO service, you will need to provide your personal information to AllClear ID. You may sign up online at [www.enroll.allclearid.com](http://www.enroll.allclearid.com) or by phone by calling 1-855-865-4453 using the following redemption code: <Redemption Code>. Please note that additional steps may be required by you in order to activate your phone alerts.

We take the security of information we process very seriously. We deeply regret any inconvenience this may cause you. If you have any questions, please contact our call center at 1-888-593-5379.

Sincerely,



Alex Ward, Owner  
CICS Employment Services, Inc.

### **Information about Identity Theft Prevention**

It is recommended that you remain vigilant for any incidents of fraud or identity theft by regularly reviewing credit card account statements and your credit report for unauthorized activity. You may obtain a free copy of your credit report from the following national consumer reporting agencies or from the Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281, 1-877-322-8228, [www.annualcreditreport.com](http://www.annualcreditreport.com):

**Equifax:** P.O. Box 105139, Atlanta, Georgia 30374-0241, 1-800-685-1111, [www.equifax.com](http://www.equifax.com)

**Experian:** P.O. Box 2002, Allen, TX 75013, 1-888-397-3742, [www.experian.com](http://www.experian.com)

**TransUnion:** P.O. Box 6790, Fullerton, CA 92834-6790, 1-800-916-8800, [www.transunion.com](http://www.transunion.com)

You can obtain information from the consumer reporting agencies, the **Federal Trade Commission (FTC)**, or your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, the FTC, or your respective Attorney General. The FTC may be contacted at FTC, **Consumer Response Center**, 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-438-4338, [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft).

**For residents of Maryland:** You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, [www.oag.state.md.us](http://www.oag.state.md.us).

**For residents of North Carolina:** You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov).

**Fraud Alerts:** There are also two types of fraud alerts that you can place on your credit report to put your creditors on notice that you may be a victim of fraud: an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by calling the toll-free fraud number of any of the three national consumer reporting agencies listed below.

**Equifax:** 1-800-525-6285, [www.equifax.com](http://www.equifax.com)

**Experian:** 1-888-397-3742, [www.experian.com](http://www.experian.com)

**TransUnion:** 1-800-680-7289, [www.transunion.com](http://www.transunion.com)

**Credit Freezes (for Non-Massachusetts Residents):** You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting agency. *Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting agency.* Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major consumer reporting agencies as specified below to find out more information:

**Equifax:** P.O. Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

**Experian:** P.O. Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)

**TransUnion:** P.O. Box 2000, Chester, PA, 19022-2000, [www.transunion.com](http://www.transunion.com)

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national consumer reporting agencies listed above.