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CONSUMER PROTECTION DIV

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March 25, 2015

Office of the Iowa Attorney General
Consumer Protection Division
Hoover State Office Bldg.
1305 E. Walnut
Des Moines, IA 50319

Re: Notice Concerning Potential Disclosure of Personal Identifying Information

To Whom It May Concern:

The Investor Protection Unit of the Delaware Department of Justice (the "IPU") recently became aware of an inadvertent disclosure of personal information housed in the Central Registration Depository and Investment Adviser Registration Depository (collectively, the "Registration Systems") maintained by the Financial Industry Regulatory Authority ("FINRA"). While we have reason to believe your agency already has been made aware of this issue, we write to inform you of the nature of the inadvertent disclosure, the steps the IPU has taken relating to the incident, and the number of residents in your state affected by the same.

Applicants for securities industry registration in Delaware file and submit information and disclosures that are housed in the Registration Systems. Between August 2012 and February 2015, pursuant to one or more Freedom of Information Act ("FOIA") request(s), the IPU provided reports (the "Reports") from the Registration Systems to journalists, academics, financial industry database/marketing contact firms, and other requesters. The Reports, which were generated by FINRA at Delaware's request for use in responding to FOIA requests, provided information gathered from Forms U4 and U5 for all broker-dealer agents and investment adviser representatives registered in Delaware at the time the Reports were generated.

The Reports included one (or more) docket/case number(s) (the "Case Numbers") the affected individuals supplied on a judgment, lien, or bankruptcy disclosure reporting page ("DRP"). We became aware that, for certain individuals, one or more of these Case Numbers reflected personal information such as a social security number, bank account number, or other personal identification number. Although affected individuals may have indicated on the pertinent DRP(s) that the Case Number(s) contained personal information, until recently the Registration Systems' software did not suppress case numbers that may have included this indication. The IPU requested for the Reports to exclude social security numbers and other personal information, and the Reports did exclude or mask social security numbers and other

personal information entered in fields specifically soliciting that information. The IPU was unaware that personal information remained embedded in the case/docket field.

In light of the potential for inadvertent disclosure of personal information for some registrants, the Reports are being remediated and have been made temporarily unavailable. The IPU and other agencies are currently working with the Registration Systems administrator, FINRA, to revamp the Reports and otherwise review the content of the registration forms in an effort to prevent further inadvertent public disclosure of personal information.

The IPU takes very seriously the privacy and security of applicants for securities registration. We began investigating this incident as soon as we learned of it, and we are continuing to work aggressively to resolve it. We already have instructed the recipients of the Reports to return and/or destroy any inadvertently disclosed private information, to take additional appropriate steps to ensure the security of the information, and to confirm their compliance with these directives.

1 residents of Iowa have been affected by the inadvertent disclosure. On or about March 23, 2015, the IPU sent letters notifying these individuals of nature of the inadvertent disclosure and the steps taken by the IPU in response. The letter, an example of which is enclosed, advises recipients to be vigilant with their financial accounts and provides contact information for the major credit reporting agencies, the Federal Trade Commission, and the Office of the Attorney General in your state.

If you have any additional questions or concerns about the circumstances of this disclosure and the IPU's response, you may contact Jeff Drobish, Deputy Attorney General, at 302-577-8424, or jeff.drobish@state.de.us.

A handwritten signature in black ink, appearing to read 'Owen Lefkon', with a stylized, flowing script.

Owen Lefkon
Investor Protection Director

Enclosure



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March 23, 2015

«FIRST_NM_Proper» «MID_NM_Proper» «LAST_NM_Proper» «SUF_NM»
«STRT1_NM_Proper»
«STRT2_NM_Proper»
«CITY_NM_Proper», «STATE_CD» «POSTL_CD»

Re: IMPORTANT NOTICE ABOUT YOUR PERSONAL INFORMATION

Dear «FIRST_NM_Proper» «MID_NM_Proper» «LAST_NM_Proper» «SUF_NM»:

The purpose of this notice is to inform you that personal information relating to your registration as a broker-dealer agent and/or investment adviser representative may have been inadvertently released by the Investor Protection Unit of the Delaware Department of Justice (the "IPU") as part of bulk data requests, even though the IPU had taken steps to exclude such information.

As an applicant for securities industry registration in Delaware you have filed and submitted information and disclosures that are housed in the Central Registration Depository and Investment Adviser Registration Depository (collectively, the "Registration Systems") maintained by the Financial Industry Regulatory Authority ("FINRA"). Between August 2012 and February 2015, pursuant to one or more Freedom of Information Act ("FOIA") request(s), the Investor Protection Unit of the Delaware Department of Justice (the "IPU") provided reports (the "Reports") from the Registration Systems to journalists, academics, financial industry database/marketing contact firms, and other requesters. The Reports, which were generated by FINRA at Delaware's request for use in responding to FOIA requests, provided information gathered from Forms U4 and U5 for all broker-dealer agents and investment adviser representatives registered in Delaware at the time the Reports were generated.

The Reports included one (or more) docket/case number(s) (the "Case Numbers") you supplied on a judgment, lien, or bankruptcy disclosure reporting page ("DRP"). It has come to our attention that one or more of these Case Numbers «PI_Text». Although you may have indicated on the pertinent DRP(s) that the Case Number(s) contained personal information, until recently the Registration Systems' software did not suppress case numbers that may have included this indication. The IPU requested for the Reports to exclude social security numbers and other personal information, and the Reports did exclude or mask social security numbers and other personal information entered in fields specifically soliciting that information. The IPU was unaware that personal information remained embedded in the case/docket field.

In light of the potential for inadvertent disclosure of personal information for some registrants, the Reports are being remediated and have been made temporarily unavailable. The IPU and other agencies are currently working with the Registration Systems administrator, FINRA, to revamp the Reports and otherwise review the content of the registration forms in an effort to prevent further inadvertent public disclosure of personal information.

The IPU takes very seriously the privacy and security of applicants for securities registration. We began investigating this incident as soon as we learned of it, and we are continuing to work aggressively to resolve it. We already have instructed the recipients of the Reports to return and/or destroy any inadvertently disclosed private information, to take additional appropriate steps to ensure the security of the information, and to confirm their compliance with these directives.

To be clear, we have not received any complaints or other evidence of misuse of any personal information inadvertently disclosed in the Reports, and we are unaware of any such complaint having been received by any other agency. But as a precautionary measure you may wish to act to protect yourself against the potential for identity theft by taking one or more of the following steps:

- Be vigilant with your financial accounts for the next 12 to 24 months, for example, by carefully reviewing your credit reports and bank, credit card and other account statements. If you discover suspicious activity on your credit report, your accounts or by any other means, you may wish to contact law enforcement or the state attorney general and file a police report of identity theft.
- Contact the fraud departments of the three major credit reporting agencies to discuss your options. You have the right to place a free 90-day fraud alert on your credit file. A fraud alert lets creditors know to contact you before opening new accounts. It also may delay your ability to obtain credit. To place a fraud alert on your credit report contact the three credit reporting agencies below.

**Equifax Credit
Information Services, Inc.**
P.O. Box 105788
Atlanta, GA 30348
(888) 766-0008
www.equifax.com

Experian
P.O. Box 9554
Allen, TX 75013
(888) 397-3742
www.experian.com

**TransUnion Fraud
Victim Assistance
Department**
P.O. Box 6790
Fullerton, CA 92834
(800) 680-7289
www.transunion.com

- Consult helpful guidance about the steps that consumers can take to protect themselves against identity theft that the Federal Trade Commission and/or your state attorney general's office provide online. Advice from the Consumer Protection Unit of the Delaware Department of Justice can be found here: <http://attorneygeneral.delaware.gov/fraud/cpu/idtheft.shtml>. You may also wish to contact the Federal Trade Commission

and/or your state's attorney general's office, whose contact information is provided below.

Federal Trade Commission

Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
(877) FTC-HELP or (877) 382-4357)

«AG»

«AG_ADDRESS_1»

«AG_ADDRESS_2»

«AG_CITY», «AG_STATE» «AG_ZIP»

«AG_PHONE»

If you have any additional questions or concerns about the circumstances of this disclosure and the IPU's response, you may contact Jeff Drobish, Deputy Attorney General, at 302-577-8424, or jeff.drobish@state.de.us.

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Owen Lefkon
Investor Protection Director