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CONSUMER PROTECTION DIV.

Akin Gump
STRAUSS HAUER & FELD LLP

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May 11, 2015

Office of the Attorney General of Iowa
Consumer Protection Division
Hoover State Office Building
1305 E. Walnut Street
Des Moines, Iowa 50319-0106

Re: Re: Data Security Breach at Honig's Whistle Stop

To the Iowa Attorney General's Office:

We are contacting you on behalf of our client, Honig's Whistle Stop ("Honig's"), about a data security incident that occurred between March 8, 2015 and April 10, 2015 and may have involved the personal information of approximately 42 residents of Iowa who were customers of Honig's. The breach involved an outside source hacking into and accessing the electronic information that is maintained by Honig's. The Company's investigation into this event is ongoing, and to the extent new material facts are uncovered, we will supplement our notice to you. Please note that in submitting this notice, Honig's does not waive any rights or defenses regarding the applicability of Iowa law or personal jurisdiction.

What Happened

On April 9, 2015, Honig's confirmed that its website had been breached. The incident involved an outside source hacking into and accessing certain electronic information that is maintained by Honig's, located in Ann Arbor, Michigan. The Company is investigating the incident and at this point has determined that the potentially exposed information in this incident included customer name, credit or debit card number, card expiration date, CVV, email address, account number, password, billing address and phone number, shipping address, and phone number.

Steps to Protect Your State Residents

Honig's provided all potentially affected Iowa residents with written notice of the incident on or about May 8, 2015. A copy of that notice is attached, excluding any identifying information. Honig's is also providing access to free identity theft protection, credit monitoring,

identity theft consultation and restoration for one year for affected individuals, and information on how to protect against identity theft and fraud. Honig's is also providing written notice of this incident to other state regulators and to the national consumer reporting agencies.

If you have any further questions regarding this incident, please do not hesitate to contact me either by telephone at (214) 969-2713, or by email at mreed@akingump.com or Nichole Collida, Assistant Manager at Honig's, either by telephone at (844) 399-9826 or by email at ncollida@honigs.com.

Sincerely,

Michelle A. Reed

Enclosure

Honig's WHISTLE STOP INC.
P.O. Box 1711
Ann Arbor, MI 48106
800-668-3284

<<MemberFirstName>> <<MemberLastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip Code>>

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

Subject: Security Incident

Dear <<MemberFirstName>> <<MemberLastName>>,

We are writing to tell you about a data security incident that may have exposed some of your personal information. We take the protection and proper use of your information very seriously. This is why we are contacting you directly to let you know how we are protecting you personally.

What Happened?

On April 9, 2015, we confirmed that our website had been breached. The incident involved an outside source hacking into and accessing certain electronic information that is maintained by Honig's Whistle Stop, Inc., located in Ann Arbor, Michigan ("Honig's"). We have determined that the information involved in this incident included customer name, credit or debit card number, card expiration date, CVV, email address, account number, password, billing address and phone number, shipping address, and phone number. This information was in our records due to your purchase of items from Honig's, either by phone or through our website at https://www.honigs.com/.

What Are We Doing To Protect You?

Honig's values your business and deeply regrets that this incident occurred. We are partnering with a leading third-party forensics firm to conduct a thorough investigation of the incident and to determine additional measures we can take that would be designed to help prevent incidents of this kind in the future. Honig's has already implemented additional security measures designed to prevent a recurrence of the breach, and to protect the privacy of Honig's valued customers such as yourself. These additional security measures include, but are not limited to re-issuing administrative credentials and installing various security patches.

To help relieve concerns and restore confidence following this incident, Honig's has secured the services of Kroll to **provide identity theft protection at no cost to you for one year**. Kroll's team has extensive experience helping people who have sustained an unintentional exposure of confidential data.

Your identity theft protection services include **Credit Monitoring, Identity Theft Consultation** and **Restoration**. Additional information describing your services is included with this letter. This offer is entirely optional for you and offered as an added measure to protect your personal information from misuse. **If you wish to enroll in this service, please contact Kroll by August 1, 2015.**

> **Visit kroll.idMonitoringService.com** and follow the online instructions to take advantage of your Identity Theft Protection Services.
>
> **Membership Number:** <<Member ID>>

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.

What Should You Do If You Have Any Questions Or Feel You Have An Identity Theft Issue?

Call **1-877-309-9842, 8 a.m. to 5 p.m. (Central Time), Monday through Friday.** Kroll's licensed investigators are standing by to answer your questions or help you with concerns you may have. *Please have your membership number ready.*

We are notifying you of the security breach so that you can take action along with our efforts to minimize or eliminate potential harm. It is important that you be informed of this accidental disclosure and take precautions to protect against any possible misuse or identity theft.

As a first preventative step, we recommend that you place a fraud alert on your credit file. A fraud alert informs creditors of possible fraudulent activity within your report and lets creditors to know to contact you before they open any new accounts in your name or change your existing accounts. An initial fraud alert is free and will stay on your credit file for at least 90 days. Contact any one of the three major credit bureaus listed below to place a fraud alert on your credit file. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts.

Equifax	**Experian**	**TransUnion**
(800) 525-6285	(888) 397-3742	(800) 680-7289
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 740241	535 Anton Blvd. Suite 100	P.O. Box 6790
Atlanta, GA 30374	Costa Mesa, CA 92626	Fullerton, CA 92834

Additionally, you may obtain a free copy of your credit report from any of the three major credit reporting agencies listed above once every 12 months by visiting http://www.annualcreditreport.com, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at http://www.consumer.ftc.gov/articles/pdf-0093-annual-report-request-form.pdf.

As a second step, we recommend that you closely monitor your financial accounts and, if you see any unauthorized activity – such as charges to your credit card, inaccurate personal information associated with your account, or new accounts that you did not open – promptly contact the financial institution with which the account is maintained. You should also promptly report any fraudulent activity to the proper law enforcement authorities, your state attorney general, and the United States Federal Trade Commission ("FTC"). Even if you do not find any suspicious activity on your initial credit reports, the FTC recommends that you check your credit reports periodically. Checking your credit reports periodically allows you to become aware of any potential problems and address them quickly. You can follow this link on the FTC's website - http://www.consumer.gov/idtheft/ - to obtain additional helpful information about possible identity theft. Additionally, you may wish to submit a complaint with the FTC by calling 1-877-ID-THEFT (1-877-438-4338) or online at https://www.ftccomplaintassistant.gov/. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcers for their investigations. We offer this information only as a precaution to assist you in preventing any misuse of your personal information.

In some U.S. states, you have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. Additionally, if you request a security freeze from a consumer reporting agency there may be a fee up to $10.00 to place, lift, or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement. You must separately place a security freeze on your credit file with each credit reporting agency.

On behalf of Honig's, I want to sincerely express our apologies for this incident and any inconvenience or concern this may have caused. If you have any further questions about the incident or about your identity theft protection services, please contact the Company's agent, Kroll, at **1-877-309-9842**.

Sincerely,

Gene Bouwman
CEO, Honig's Whistlestop, Inc.

kroll.idMonitoringService.com is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari.
To receive credit services by mail instead of online, please call 1-877-309-9842.

U.S. State Notification Requirements

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, Wyoming and North Carolina:
It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of California and Wyoming:
Notification of the security breach was not delayed as a result of a law enforcement litigation.

For residents of Iowa:
State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:
State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

For residents of Maryland, Illinois, and North Carolina:
You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland residents can call the Consumer Protection Division of the Attorney General's office toll free at (888) 743-0023, or visit the website at http://www.oag.state.md.us/consumer.

North Carolina residents can call the Consumer Protection Division of the Attorney General's office toll free at (877) 566-7226, or visit the website at http://www.ncdoj.gov/Consumer.aspx.

For residents of Maryland, Puerto Rico, Vermont, and Wyoming:
Honig's has established the following toll-free number for affected residents to call if they have questions or are seeking additional information: 1-877-309-9842.

Kroll.

Take Advantage of Your Identity Theft Protection Services

You've been provided with access to services from Kroll, a global leader in risk mitigation. Over the past 14 years, Kroll has provided data breach response services for cases impacting more than 100 million individuals including personal consultation to more than 180,000 consumers and worked some 8,000 confirmed identity theft cases. When you need assistance, rest assured that your services are backed by an expert team who can answer any question you may have.

The following services are included in your **Credit Monitoring** package:

Kroll employs a team of experienced licensed investigators to provide you with expert, one-on-one assistance:

Consultation: You have unlimited access to consultation with a dedicated licensed investigator at Kroll. Support includes best practice tips to assist in ongoing protection, 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.

Restoration: Kroll's restoration services are the most comprehensive of any provider. Should you become a victim of identity theft, a dedicated licensed investigator can work on your behalf to resolve related issues. The investigator does more than shoulder the bulk of the recovery; they can dig deep to uncover all aspects of the theft, and then work with creditors, collection agencies, utilities, government entities, and more ... to resolve it.

Credit Monitoring: Credit monitoring can be a key tool in detecting early warning signs of identity theft. You'll 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 investigator, who can help you determine if it's an indicator of identity theft. You'll also receive "no activity" notices if there have been no changes to your data.

How to Take Advantage of Your Identity Theft Protection Services

Visit kroll.idMonitoringService.com and follow the online instructions to take advantage of your identity theft protection services.

You can view your services at any time by logging onto Kroll's identity protection website. When you enroll, be prepared to provide the membership number included with the accompanying letter.

Help is only a phone call away.

If you have a question, need assistance, or feel you may be a victim of identity theft, call Kroll at the toll-free number provided in the accompanying letter, and ask to speak with an investigator.

Take advantage of this no-cost opportunity and let the experts at Kroll help you assess your situation and safeguard your identity.

Kroll.idMonitoringService.com is compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox or Safari.