



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

3 Allied Drive, Suite 303  
Dedham, MA 02026

August 21, 2024

**VIA E-MAIL**

Office of the New Hampshire Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301  
E-mail: [DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov)

**Re: Notice of Data Event**

To Whom It May Concern:

We represent Page Southerland Page, located at One New York Plaza, New York, NY 10004, and are writing to notify your office of an incident that occurred within Davis Brody Bond, which Page Southerland Page acquired in 2023 (collectively, “Davis Brody Bond”), and which may affect the security of certain personal information relating to three (3) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Davis Brody Bond does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On November 5, 2023, David Brody Bond observed unexpected network activity that impacted certain Davis Brody Bond computer systems. Davis Brody Bond promptly took steps to secure its systems, and, with the assistance of third-party cybersecurity specialists, investigated the nature and scope of the incident. The investigation found that, between November 2, 2023, and November 5, 2023, an unauthorized individual had access to certain documents stored within the impacted environment. A comprehensive and time-consuming review of the accessible data was subsequently performed to determine whether the data contained any sensitive information and to identify the individuals to whom that data related. On May 20, 2024, the review was completed. Davis Brody Bond then worked to validate the results and supply missing contact information to notify the affected individuals, which was completed on August 9, 2024.

The information that could have been subject to unauthorized access includes

### **Notice to New Hampshire Residents**

On or about August 19, 2024, Davis Brody Bond began providing written notice of this incident to three (3) New Hampshire 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 learning of the incident, Davis Brody Bond moved quickly to investigate and respond to the incident, assess the security of Davis Brody Bond systems, and identify potentially affected individuals. Further, Davis Brody Bond notified federal law enforcement regarding the incident. Davis Brody Bond reviewed and assessed the appropriateness of existing policies and procedures related to data protection and security. Davis Brody Bond provided access to credit monitoring services for through IDX to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Davis Brody Bond provided potentially affected individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to law enforcement. Davis Brody Bond provided individuals with information on how to place fraud alerts and credit freezes on their credit files, 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.

Davis Brody Bond is providing written notice of this incident to relevant state regulators, as necessary.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at

Very truly yours,

Lynda Jensen of  
MULLEN COUGHLIN LLC

LRJ/msz  
Enclosure

# **EXHIBIT A**

# Davis Brody Bond

A Page/ Company

August 19, 2024

Davis Brody Bond  
A Page Company  
One New York Plaza, Suite 4200  
New York, NY 10004  
TEL 212 633 4700  
Pagethink.com

<<Name 1>> <<Name 2>>  
<<Address 1>>  
<<Address 2>> <<Date>>  
<<City>>, <<State>> <<Zip>>  
<<Country>>

Dear <<Name 1>> <<Name 2>>:

Page Southerland Page, Inc. (“Page”) writes to inform you of an incident that may affect the privacy of some of your information. This incident occurred within Davis Brody Bond, which Page Southerland Page acquired in 2023. Although Page is unaware of any actual or attempted misuse of your information, we are providing you notice of the incident, steps we are taking in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

**What Happened.** On November 5, 2023, we observed unexpected network activity that impacted certain Davis Brody Bond computer systems. We secured our systems and, with the assistance of third-party cybersecurity specialists, investigated the nature and scope of the incident. The investigation confirmed that, between November 2, 2023, and November 5, 2023, someone without authorization had access to certain documents stored within the impacted environment. A comprehensive and time-consuming review of the accessible data was subsequently performed to determine whether the data contained any sensitive information and to identify the individuals to whom that data related. On May 20, 2024, we concluded this review and determined that your information resided in the accessible data.

**What Information Was Involved.** Page is unaware of any actual or attempted misuse of your personal information. However, we are providing you with this notice out of an abundance of caution. Although the accessible data contains information that varies by individual, the types of information present in the data included your

**What We Are Doing.** Page treats its responsibility to safeguard information in its care as an utmost priority. As such, we responded promptly to this incident and worked diligently to provide you with accurate and complete notice of the incident as soon as possible. As part of our ongoing commitment to the privacy and security of personal information in our care, we reviewed and assessed the continued appropriateness of existing policies and procedures relating to data protection and security. We also implemented additional security measures designed to limit the likelihood of future similar incidents. Page is providing notice of this incident to potentially impacted individuals and to regulators, where required.

Out of an abundance of caution, Page is providing you with of complimentary access to credit monitoring and identity restoration services through IDX, as well as guidance on how to protect your information, should you feel it is appropriate to do so. Although we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself.

**What You Can Do.** Although there is no evidence of any actual or attempted misuse of your information, Page encourages you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and explanation of benefits and by monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. You should notify your bank or credit card company of any errors or suspicious activity. We also encourage you to review the information in the enclosed *Steps You Can Take to Help Protect Your Information*. There, you will find additional information about the complimentary credit monitoring services and how to enroll.

**For More Information.** We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please contact us at: Zoltan Karl, or Julie Rusk, . You may also write to us directly at: 1100 Louisiana, Ste 1, Houston, Texas 77002

Sincerely,

**Julie Rusk**  
Chief Operations Officer  
Page Southerland Page

## Steps You Can Take to Help Protect Your Information

### Enroll in Credit Monitoring

To help protect your identity, we are offering identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection services include: of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

To activate the credit monitoring provided as part of your IDX identity protection membership, go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided below. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is .

### 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 one-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 a 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>
1-888-298-0045	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 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 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 Street, NW, Washington, DC 20001; 1-202-727-3400; and [oag.dc.gov](http://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.marylandattorneygeneral.gov](http://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; 1-401-274-4400; and [www.riag.ri.gov](http://www.riag.ri.gov). 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.