

# BakerHostetler

**Baker & Hostetler LLP**

811 Main Street  
Suite 1100  
Houston, TX 77002-6111

T 713.751.1600  
F 713.751.1717  
www.bakerlaw.com

April 9, 2024

**VIA E-MAIL (DOJ-CPB@DOJ.NH.GOV)**

Attorney General John Formella  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

*Re: Incident Notification*

Dear Attorney General Formella:

We are writing on behalf of our client, Bristol Bay Construction Holdings (“BBCH”), to notify your office of a security incident.

BBCH recently learned of a scam that involved a website created to imitate Ceridian, the human resource portal utilized by BBCH. The fake website was designed to be accessible via a search engine (such as Google and Bing) and collect account credentials when individuals attempted to log into the fake portal. Recently, a BBCH user, believing they were accessing the legitimate Ceridian portal, unknowingly accessed the fake website and provided their username and password to the bad actor. BBCH became aware of this incident when the internal protocols identified a request submitted to BBCH payroll that was not consistent with BBCH procedures. After a brief inquiry, BBCH independently engaged cybersecurity professionals to conduct an investigation and verify that their own systems are secure. On January 9, 2024, logging provided by Ceridian confirmed that the bad actor downloaded an employee census report that contained the \_\_\_\_\_ of 12 New Hampshire residents.

On April 9, 2024, BBCH mailed notification letters to the New Hampshire residents via U.S. mail in accordance with N.H. Rev. Stat. Ann. § 359-C:20. A copy of the notification letter is enclosed. BBCH is offering notified individuals complimentary \_\_\_\_\_ memberships to credit monitoring and identity protection services.

To help prevent this type of incident from happening again, BBCH implemented additional security measures and will continue to train employees concerning data security.

Please do not hesitate to contact me if you have any questions regarding this matter.

April 9, 2024  
Page 2

Sincerely,

Kimberly C. Gordy  
Partner

Enclosure



Return mail will be processed by: IBC  
PO Box 847  
Holbrook, NY 11741

[Redacted]

April 5, 2024

Dear [Redacted]:

Bristol Bay Construction Holdings (“BBCH”) recognizes the importance of protecting employee information. We are writing to inform you of an incident that may have involved some of your information. This notice explains the incident, the measures we have taken in response, and some additional steps you may consider taking.

**What happened?** BBCH recently learned of a scam that involved a website created to imitate Ceridian, the human resource portal utilized by BBCH. The fake website was designed to be accessible via a search engine (such as Google and Bing) and collect account credentials when individuals attempted to log into the fake portal. Recently, a BBCH user, believing they were accessing the legitimate Ceridian portal, unknowingly accessed the fake website and provided their username and password to the bad actor. We became aware of this incident when our internal protocols identified a request submitted to BBCH payroll that was not consistent with BBCH procedures. After a brief inquiry, we independently engaged cybersecurity professionals to conduct an investigation and verify that our own systems are secure.

**What information was involved?** Logging provided by Ceridian showed that the bad actor downloaded an employee census report that contained your [Redacted] between November 6, 2023, and November 7, 2023.

**What we are doing in response:** We take matters like this very seriously. In addition to conducting our own investigation, we addressed the scam website issue with Ceridian and ensured that additional security controls are implemented on our platform to help prevent a future incident. We also want to remind you that BBCH offers all employees credit monitoring and identity theft protection at no cost through LifeLock. This plan includes identity monitoring and alerts, full-service remediation, and identity theft reimbursement. If you have not enrolled in LifeLock already and would like to do so, or have additional questions about the service, please contact [Redacted]

For more information on identity theft prevention, please see the pages following this letter.

If you have any questions about this incident, please call 888-606-0732, Monday through Friday, between 9:00 am - 7:00 pm Eastern Time.

Sincerely, [Redacted]

John D. Morrison  
President & Chief Executive Officer

BRIS-ADT

## ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-888-378-4329
- *Experian*, PO Box 2002, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742
- *TransUnion*, PO Box 1000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com), 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.identitytheft.gov](http://www.identitytheft.gov)

### **Fraud Alerts and Security Freezes**

***Fraud Alerts:*** There are two types of general fraud alerts 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 one year. 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.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

***Credit or Security Freezes:*** You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

*How do I place a freeze on my credit reports?* There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- *Equifax Security Freeze*, PO Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)
- *Experian Security Freeze*, PO Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)
- *TransUnion Security Freeze*, PO Box 160, Woodlyn, PA 19094, [www.transunion.com](http://www.transunion.com)

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

*How do I lift a freeze?* A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Bristol Bay Construction Holdings is located at 1006 Floyd Culler Court, Oak Ridge, Tennessee, 37830 and can be reached at (865) 481-7837.

#### **Additional information for residents of the following states:**

Connecticut: You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, [www.ct.gov/ag](http://www.ct.gov/ag)

District of Columbia: You may contact and obtain information from your attorney general at: Office of the Attorney General for the District of Columbia, 441 4th Street NW, Washington, DC 20001, 1-202-727-3400, [www.oag.dc.gov](http://www.oag.dc.gov)

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, [www.marylandattorneygeneral.gov/](http://www.marylandattorneygeneral.gov/)

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov)

Rhode Island: This incident involves 5 individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, [www.riag.ri.gov](http://www.riag.ri.gov)

West Virginia: You have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies 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 reports to be provided to employers.
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.