McDonald Hopkins
A business advisory and advocacy law firm®

McDonald Hopkins PLC
39533 Woodward Avenue
Suite 318
Bloomfield Hills, MI 48304

P 1.248.646.5070
F 1.248.646.5075

RECEIVED
JAN 05 2023
CONSUMER PROTECTION

December 30, 2022

VIA U.S. MAIL

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

Re: City Enterprises, LLC – Incident Notification

Dear Sir or Madam:

McDonald Hopkins PLC represents City Enterprises, LLC. I am writing to provide notification of an incident at City Enterprises that may affect the security of personal information of approximately 9 New Hampshire residents. City Enterprises' investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, City Enterprises does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

City Enterprises detected unauthorized access to its network as a result of a cybersecurity incident that resulted in the potential exposure of data City Enterprises maintains on behalf of the following entities: Dealers Auto Auction Group LLC; City Auto Sales LLC; City Auto Finance LLC and City Leasing LLC. Upon learning of this issue, City Enterprises contained the threat by disabling all unauthorized access to its network and restoring its systems as needed. In addition, City Enterprises immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these situations to analyze the extent of any compromise to its network.

After an extensive forensic investigation and manual document review, City Enterprises discovered on December 16, 2022, that certain files that were removed from portions of the City Enterprises network between October 19, 2021 through November 9, 2021 contained data that included the residents' full names along with one or more of the following, Social Security numbers, driver's licenses or state identification numbers and financial account information.

City Enterprises is providing notification of this incident commencing on December 30, 2022, in substantially the same form as the documents attached hereto. City Enterprises is advising affected individuals about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. Those individuals whose credit or debit card information was impacted are being advised to contact their financial institutions to inquire about steps to take to protect their accounts. Individuals are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission. Those individuals whose Social Security numbers may have been impacted are being offered complimentary credit monitoring through Experian.

At City Enterprises, protecting the privacy of personal information is a top priority. City Enterprises is committed to maintaining the privacy of personal information in its possession and has

taken many precautions to safeguard it. City Enterprises continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions regarding this notification, please contact me at or . Thank you for your cooperation.

Sincerely,

James J. Giszczak

Encl.

cityenterprises
THE DRIVING FORCE

Dear

The privacy and security of the personal information we maintain is of the utmost importance to City Enterprises, LLC. We are writing with important information regarding a security incident that may have involved your personal information. We want to provide you with information about the incident, explain the services we are making available to you and let you know that we continue to take significant measures to protect your information.

What Happened?

City Enterprises detected unauthorized access to our network as a result of a cybersecurity incident that resulted in the potential exposure of the data we maintain on behalf of the following entities: Dealers Auto Auction Group LLC; City Auto Sales LLC; City Auto Finance LLC and City Leasing LLC.

What We Are Doing.

Upon learning of this issue, we contained the threat by disabling all unauthorized access to our network, restored all encrypted data, and immediately commenced a prompt and thorough investigation. As part of our investigation, we have been working very closely with external cybersecurity professionals experienced in handling these types of incidents. Following a forensics investigation, we discovered on December 16, 2022 that certain files that contain personal information were potentially removed from our network by the unauthorized party between October 19, 2021 through November 9, 2021.

What Information Was Involved?

The impacted files contained some of your personal information. This included your

What You Can Do.

We have no evidence that any of your information has been misused. Nevertheless, out of an abundance of caution, we want to make you aware of the incident. To help protect your information, we are offering a complimentary one-year membership of Experian IdentityWorks℠ Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a fraud alert and security freeze on your credit files, and obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

For More Information

Please accept our apologies that this incident occurred. We are committed to maintain the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information, including updating passwords and enhancing email access protocols.

If you have any further questions regarding this incident, please call [redacted]. This response line is staffed with professionals familiar with this incident and is available Monday through Friday, from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays.

Sincerely,

City Enterprises, LLC

OTHER IMPORTANT INFORMATION

1. **Enrolling in Complimentary 12-Month Credit Monitoring.**

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: [redacted] Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: https://www.experianidworks.com/3bcredit
3. PROVIDE the **Activation Code**: [redacted]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number [redacted] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARE™**: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **$1 Million Identity Theft Insurance****: Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at https://www.experianidworks.com/3bcredit
or call 877-288-8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

2. **Placing a Fraud Alert on Your Credit File.**

Whether or not you choose to use the complimentary 12-month credit monitoring services, we recommend that you place an initial one-year "fraud alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax	*Experian*	*TransUnion*
P.O. Box 105069	P.O. Box 9554	Fraud Victim Assistance Department
Atlanta, GA 30348-5069	Allen, TX 75013	P.O. Box 2000
https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/	https://www.experian.com/fraud/center.html	Chester, PA 19016-2000
(800) 525-6285	(888) 397-3742	https://www.transunion.com/fraud-alerts
		(800) 680-7289

3. Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "security freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

Equifax Security Freeze	**Experian Security Freeze**	**TransUnion Security Freeze**
P.O. Box 105788	P.O. Box 9554	P.O. Box 160
Atlanta, GA 30348	Allen, TX 75013	Woodlyn, PA 19094
https://www.equifax.com/personal/credit-report-services/credit-freeze/	http://experian.com/freeze	https://www.transunion.com/credit-freeze
(800) 349-9960	(888) 397-3742	(888) 909-8872
(888) 298-0045		

In order to place the security freeze, 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 reporting company will send you a confirmation letter containing 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.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

4. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. Additional Helpful Resources.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If this notice letter states that your financial account information and/or credit or debit card information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect your account, including whether you should close your account or obtain a new account number.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

Iowa Residents: You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity Theft: Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, Telephone: (515) 281-5164

Maryland Residents: You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

New Mexico Residents: You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov.

In Addition, New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number, password, or similar device provided by the consumer reporting agency;
2. Proper identification to verify your identity; and
3. Information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. You may contact these agencies using the contact information provided above.

New York Residents: You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; https://ag.ny.gov/consumer-frauds-bureau/identity-theft; Telephone: 800-771-7755.

North Carolina Residents: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov/, Telephone: 877-566-7226.

Oregon Residents: You may obtain information about preventing identity theft from the Oregon Attorney General's Office: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392