



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

Alexander T. Walker  
Office: 267-930-4801  
Fax: 267-930-4771  
Email: [awalker@mullen.law](mailto:awalker@mullen.law)

426 W. Lancaster Avenue, Suite 200  
Devon, PA 19333

February 11, 2021

**VIA E-MAIL**

Deputy Attorney General Stephanie Guyon  
Office of the Attorney General  
Consumer Protection Division  
954 W. Jefferson, 2nd Floor  
Boise, ID 83720  
E-mail: [stephanie.guyon@ag.idaho.gov](mailto:stephanie.guyon@ag.idaho.gov)

**Re: Supplemental Notice of Data Event**

Dear Deputy Attorney General Guyon:

We represent Bannock County, Idaho (“Bannock County”) located at 624 East Center, Pocatello, Idaho, 83201 and we write to supplement our July 1, 2020 letter to your office pursuant to Idaho Code, Title 28, Chapter 51, Section 28-51-105, to provide notice of an incident that may affect the security of some personal information relating to 2,085 Idaho residents. By providing this notice, Bannock County does not waive any rights or defenses regarding the applicability of Idaho law, the applicability of the Idaho data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On or about June 30, 2020, Bannock County learned its computer network was potentially accessed by an unknown actor on or about June 22, 2020. In response, Bannock County launched an internal investigation into the nature and scope of this activity. Bannock County’s IT department engaged a cyber-security firm to locate and retrieve the data that was illegally obtained, which was accomplished. Bannock County then hired outside counsel, which engaged forensic investigators to further analyze this event. On July 22, 2020, the forensic investigation confirmed personal information was accessed and acquired by an unauthorized actor. In parallel, Bannock County undertook a lengthy and thorough review of the potentially impacted data to determine who, and what information was impacted.

The information that could have been subject to unauthorized access may vary by individual and includes name, address, Social Security number, driver’s license, and financial account information.

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### **Notice to Idaho Residents**

On or about February 11, 2021 Bannock County provided written notice of this incident to all affected individuals, which includes two thousand eighty-five Idaho 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**

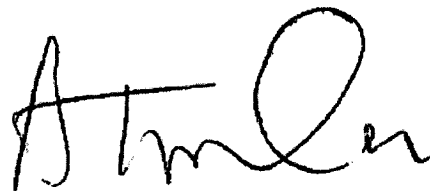
Upon discovering the event, Bannock County moved to investigate and respond to the incident, assess the security of Bannock County systems, and notify potentially affected individuals. Bannock County is also working to implement additional safeguards and training to its employees. Bannock County is providing access to credit monitoring services for twelve (12) months, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Bannock County is providing impacted 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 their credit card company and/or bank. Bannock County is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4801.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alexander T. Walker". The signature is fluid and cursive, with a large initial "A" and "W".

Alexander T. Walker of  
MULLEN COUGHLIN LLC

ATW/nfw  
Enclosure

# EXHIBIT A



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

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

<<b2b\_text\_1(SubjectLine)>>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>:

Bannock County, Idaho (“Bannock County”) is writing to inform you of a recent data privacy event that may involve some of your personal information. We take this event seriously and are providing you with information about the event and steps you may take to help protect your personal information, should you feel it is appropriate to do so.

**What Happened?** On or about June 30, 2020, we learned our computer network was potentially accessed by an unknown actor on or about June 22, 2020. In response, Bannock County launched an internal investigation into the nature and scope of this activity. Bannock County’s IT department engaged a cyber-security firm to locate and retrieve the data that was illegally obtained, which was accomplished. Bannock County then hired outside counsel, which engaged forensic investigators to further analyze this event. On July 22, 2020, the forensic investigation confirmed personal information was accessed and acquired by an unauthorized actor. In parallel, Bannock County undertook a thorough and lengthy review of the potentially impacted data to determine who, and what information was impacted.

**What Information Was Involved?** The information involved includes your <<b2b\_text\_2(DataElements)>>. To date, we are unaware of any actual or attempted misuse of this information as a result of this incident and are sending this notice out of an abundance of caution.

**What We Are Doing in Response?** The security of information in our care is among our highest priorities. In addition to launching an internal investigation into this incident, we are reviewing our existing policies and procedures and will implement additional safeguards, as needed. In an abundance of caution, we are notifying you, so that you may take further steps to help protect your personal information, should you feel it is appropriate to do so.

Although we are unaware of any actual or attempted misuse of your personal information as a result of this incident, we are offering you access to complimentary identity monitoring services through Kroll for 12 months. In addition, we have provided notice to appropriate regulatory authorities.

**What Can You Do?** We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and monitor your credit reports for suspicious activity. You may also review the information contained in the attached “*Steps You Can Take to Help Protect Your Personal Information*” There you will also find more information on the identity monitoring services we are making available to you. While Bannock County will cover the cost of these services, you will need to complete the activation process.

**For More Information.** We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-XXX-XXX-XXXX, Monday through Friday, 8:00 am to 5:30 pm, Central Time. You may also write to us at 624 East Center, Pocatello, Idaho 83201.

Sincerely,

Scott Crowther

Bannock County Commissioner’s Chief of Staff

## Steps You Can Take to Help Protect Your Information

### **Activate Identity Monitoring**

Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

You have until **April 30, 2021** to activate your identity monitoring services.

Membership Number: <<Member ID>>

You have been provided with access to the following services from Kroll:

#### **Single Bureau Credit Monitoring**

You will 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 fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

#### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, 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.

#### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

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.

### **Monitor Your Accounts**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. 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 contact the three major credit bureaus directly to request a free copy of your credit report.

You have the 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. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian  
PO Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

TransUnion  
P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

Equifax  
PO Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

To request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;

3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a 1-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 agencies listed below:

**Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

**TransUnion**

P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289

[www.transunion.com/fraud-victim-resource/place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

**Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

**Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can 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). 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 in order 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.

**California Residents:** Visit the California Office of Privacy Protection ([www.oag.ca.gov/privacy](http://www.oag.ca.gov/privacy)) for additional information on protection against identity theft. **Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, [www.ag.ky.gov](http://www.ag.ky.gov). Telephone: 1-502-696-5300. **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 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 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 a 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. You can 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. **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://www.doj.state.or.us/), Telephone: 877-877-9392. **All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), 1-877-IDTHEFT (438-4338).