LEWIS BRISBOIS

LEWIS BRISBOIS BISGAARD & SMITH LLP

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March 21, 2022

VIA Web Portal

Attorney General Bob Ferguson
Office of the Attorney General
Consumer Protection Division
1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100

Re: **Notice of Data Security Incident**

Dear Attorney General Bob Ferguson:

Lewis Brisbois Bisgaard & Smith LLP represents Morley Companies Inc. ("Morley") in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with North Dakota's data breach notification statute.

1. Nature of the Incident

Morley provides business processing and business administration services and is based in Saginaw, Michigan.

On August 1, 2021, Morley discovered unusual activity affecting Morley's computers. Morley's information technology personnel immediately launched an investigation to determine what happened. Morley also engaged cybersecurity experts to assist with the investigation. The investigation determined that Morley had experienced a data security incident and that an unknown actor may have gained access to and obtained data from the Morley network without authorization. Morley then worked to identify and review the information that was involved. On March 10, 2022, it was determined that some personal information may have been included in the information involved in the incident.

2. Type of Information and Number of Washington Residents Involved

The incident involved personal information for approximately 42,633 Washington residents. The information involved in the incident may include name, date of birth, Social Security number, Drivers License number, and Health Information.

The affected individuals will receive a letter notifying them of the incident and providing steps they can take to protect their personal information. The notification letters will be sent via USPS First Class Mail on March 21, 2022. A sample copy of the notification letter is enclosed with this letter. Our investigation into the incident is ongoing and we will provide additional notice to newly impacted individuals as they are identified.

3. Measures Taken to Address the Incident

Morley has taken steps outlined above in response to this incident and has made alterations to its cyber environment to help prevent similar incidents from occurring in the future. Morley has notified the FBI of this incident and are working with them in any resulting investigation. Additionally, we are providing impacted individuals with information about steps they can take to help protect their personal information. Morley is also offering credit monitoring and identity protection services at no cost through IDX, which will help individuals resolve issues if their identity is compromised due to this incident.

4. Contact Information

Morley remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact me at 215.977.4060 or Richard.Goldberg@lewisbrisbois.com.

Sincerely,

Richard Goldberg

Richard W. Goldberg of
LEWIS BRISBOIS BISGAARD & SMITH LLP

RWG:me
Enclosure: Sample Consumer Notification Letter

MORLEY
P.O Box 989728
West Sacramento, CA 95798-9728

Jill Gushow
General Counsel
One Morley Plaza, Saginaw, MI 48603
morleycompanies.com

To enroll in credit/identity monitoring, please call:
1-833-676-2151
or visit:
www.idxprotect.com
Enrollment Code: <<Enrollment>>

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

March 21, 2022

Re: <<Variable Subject Title>>

Dear <<First Name>> <<Last Name>>,

We are writing to inform you of an incident that may have involved your personal information. You may not have heard of our company - Morley Companies, Inc., in Michigan - but we process information for health plans so that they can better serve you. We take the privacy and security of your information very seriously. Out of an abundance of caution we are providing identity theft protection to those whose information may have been in our data systems affected by the incident. Below is information about the incident and steps you can take to help protect your personal information, including activating the identity monitoring services we are offering at no cost to you.

What Happened? Morley Companies discovered it could not access certain files and folders on its systems. We immediately launched an investigation into the incident with the assistance of third-party computer forensic specialists to determine the nature and scope of the incident along with helping restore our systems. That investigation revealed that a ransomware-type malware had prevented access to some data files on our system beginning August 1, 2021, and there was unauthorized access to some files that contained personal information. We then worked diligently to prevent further access and identify impacted individuals. Special programming was required and unique processes had to be built in order to begin analyzing the data. The data complexity also required special processes to search for and identify key information. This process was lengthy but necessary to ensure appropriate notification occurred. In March 2022, it was confirmed that your information was involved. Importantly, Morley Companies is not aware of any misuse of your personal information due to this incident.

What Information Was Involved? The files that may have been accessed by the unauthorized individual contained <<Variable1>><<Variable2>><<Variable3>>. Your Social Security number was included, but no financial information was involved.

What Are We Doing? As soon as we discovered the incident, we took the steps described above. In addition, we worked with our experts to try to prevent such an incident from ever happening again. We have also secured the services of IDX to provide credit and identity monitoring at no cost to you for 24 months. IDX is a global leader in risk mitigation and response, and its team has extensive experience helping people who have sustained an exposure of personal data. The IDX services include credit monitoring; identity monitoring; $1 million in identity theft expense reimbursement insurance; and fraud prevention and resolution support.

To receive credit services, you must be over the age of 18, 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. Additional information describing your complimentary IDX services is included with this letter.

Please note you must enroll by June 21, 2022. If you have questions or need assistance, please call IDX at 1-833-676-2151. Please see instructions in the top right corner of this letter.

What You Can Do: Please review the enclosed "Steps You Can Take to Further Protect Your Information" page. It describes additional steps you can take to help safeguard your information, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file. We also encourage you to activate the complimentary identity monitoring services we are making available through IDX.

For More Information: If you have questions or need assistance, please call IDX at 1-833-676-2151, Monday through Friday from 9 a.m. to 9 p.m. ET.

Protecting your information is important to us. Please know that we take this incident very seriously and deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Jill Gushow
General Counsel
Morley Companies

Steps You Can Take to Further Protect Your Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting http://www.annualcreditreport.com/, calling toll-free 1-877-322-8228, 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 this form at https://www.annualcreditreport.com/cra/requestformfinal.pdf. You also can contact one of the following three national credit reporting agencies:

TransUnion	**Experian**	**Equifax**	**Free Annual Report**
P.O. Box 1000	P.O. Box 9532	P.O. Box 105851	P.O. Box 105281
Chester, PA19016	Allen, TX 75013	Atlanta, GA 30348	Atlanta, GA 30348
1-800-916-8800	1-888-397-3742	1-800-685-1111	1-877-322-8228
www.transunion.com	www.experian.com	www.equifax.com	www.annualcreditreport.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at http://www.annualcreditreport.com.

Security Freeze: Under U.S. law, you have the right to put a security freeze on your credit file for up to one year at no cost. 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. You must separately place a security freeze on your credit file with each credit reporting agency. 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.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Contact information for the FTC is: **Federal Trade Commission,** 600 Pennsylvania Ave, NW, Washington, DC 20580, www.consumer.ftc.gov and www.ftc.gov/idtheft, 1-877-438-4338. Residents of New York, Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

New York Attorney General	**Maryland Attorney General**	**North Carolina Attorney General**	**Rhode Island Attorney General**
Bureau of Internet and Technology Resources	200 St. Paul Place	9001 Mail Service Center	150 South Main Street
28 Liberty Street	Baltimore, MD 21202	Raleigh, NC 27699	Providence, RI 02903
New York, NY 10005	www.oag.state.md.us	www.ncdoj.gov	www.riag.ri.gov
ifraud@ag.ny.gov	1-888-743-0023	1-877-566-7226	401-274-4400
1-212-416-8433			

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information, as well as others. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf