



LEWIS BRISBOIS BISGAARD & SMITH LLP

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June 21, 2022

**VIA EMAIL**

Attorney General Bob Ferguson  
Office of the Attorney General  
1125 Washington St SE  
PO Box 40100  
Olympia, WA 98504  
E-Mail: [SecurityBreach@atg.wa.gov](mailto:SecurityBreach@atg.wa.gov)

Re: Notification of Data Security Incident

Dear Attorney General Ferguson:

We represent Renton School District, ("RSD"), located in Renton, Washington. This letter is being sent on behalf of RSD in connection with a data security incident described in greater detail below.

**I. Background and Time Frame at Issue**

On or around May 4, 2022, RSD received notice from a vendor that it had previously contracted with that said vendor suffered a network security incident on January 8, 2022. Moreover that, by March 24, 2022, this vendor had confirmed that certain databases containing potentially protected student information it maintained were subject to unauthorized access between December 28, 2021, through January 8, 2022. More specifically, that RSD's data this vendor had maintained may have been exposed as well.

Although we have no evidence that any personal information itself was misused in connection with this incident, out of an abundance of caution, we are notifying potentially impacted individuals of this incident via the enclosed letter.

**II. Number of Washington Consumers Impacted/Type of Information at Issue**

On May 31, 2022, we determined that some personal information belonging to 20,509 Washington residents resided in RSD's data, maintained by this third-party vendor, which may have been accessible to or accessed by the unauthorized individual(s). The personal information that may have accessed without authorization included: student names, student identification numbers, academic and behavior information, enrollment information, accommodation information, and student demographic information.

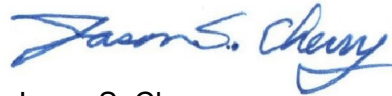
**III. Steps Taken to Contain Breach**

On June 17, 2022, RSD notified 20,509 potentially affected Washington residents by first class U.S. mail. RSD provided complimentary credit monitoring and identity protection services through IDX. A sample copy of the notification letter is included with this correspondence.

As you can see, the notification letter provides information about the incident, the categories of personal information involved, and recommended steps that individuals may take to protect their information. It also offers complementary identity protection services by IDX, a global leader in risk mitigation and response. The services include credit monitoring, Cyberscan dark web monitoring, \$1 million identify theft reimbursement insurance, and fully managed identity recovery services for 12 months.

If you have any questions or need additional information, please do not hesitate to contact me at (213) 358-6067 or via email at [Jason.Cherry@lewisbrisbois.com](mailto:Jason.Cherry@lewisbrisbois.com).

Sincerely,



Jason S. Cherry  
Lewis Brisbois Bisgaard & Smith LLP

Enclosure: Sample Consumer Notification Letter

**Exhibit A - Minor Letter**

To Enroll, Please Call:

(833) 749-1673

Or Visit:

[\[https://response.idx.us/illuminate\]](https://response.idx.us/illuminate)

Enrollment Code: [XXXXXXXXXX]

[LOGO]

<<Return Mail Address>>

Parent or Guardian of: <<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

<<City>>, <<State>> <<Zip>>

<<Country>>

<<Date>>

<<Variable Text>>

Dear Parent or Guardian of <<Name 1>> <<Name 2>>:

Illuminate Education is an education company that provides applications and technology support to schools and school districts, including [IE customer name]. Illuminate Education is writing, on behalf of [IE customer name] to make you aware of an incident that may affect the security of some of your minor's information. While we are not aware of any actual or attempted misuse of your minor's information, we are providing you with an overview of the incident, our ongoing response, and resources available to you right now to help protect your minor's information, should you feel it is appropriate to do so.

**What Happened?** On January 8, 2022, Illuminate Education became aware of suspicious activity in a set of isolated applications within our environment. We immediately took steps to secure the affected applications and launched an investigation with external forensic specialists to determine the nature and scope of the activity.

On March 24, 2022, our investigation confirmed that certain databases containing potentially protected student information were subject to unauthorized access between December 28, 2021, and January 8, 2022. On or around [date] Illuminate Education began the process of notifying [IE Customer name]. Illuminate Education is now notifying you of this incident because our investigation has determined that your minor's information was contained in the affected databases.

**What Information Was Involved?** The affected databases contained the following: your minor's name and academic and behavior information, enrollment information, accommodation information, special education information, and/or student demographic information. We want to assure you that Social Security numbers and financial information were not at risk as a result of this event. Although we have no evidence that any information was subject to actual or attempted misuse, we are providing you with this notice out of an abundance of caution.

**What We Are Doing.** The confidentiality, privacy, and security of information in our care is among our highest priorities. When we discovered this incident, we immediately rotated credentials for the impacted applications and began an investigation with the support of third-party forensic specialists to ensure the security of our systems and determine what data might have been affected. We also conducted a review of our policies and procedures and implemented additional security measures to protect the security of information in our possession.

As an added precaution, we are offering your minor complementary access to 12 months of identity monitoring services through IDX. We encourage you to enroll your minor in these services, as we are not able to act on your behalf to enroll

***Exhibit A - Minor Letter***

you. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Minor's Information* for additional information on these services.

**What You Can Do.** As standard best practice, we encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your minor's account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed "*Steps You Can Take to Help Protect Your Minor's Personal Information.*"

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (833) 749-1673, Monday through Friday from 9am – 9pm EST.

We take this incident very seriously and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

[Signature]

Scott Virkler  
Chief Product Officer  
Illuminate Education

## ***Exhibit A - Minor Letter***

### **STEPS YOU CAN TAKE TO HELP PROTECT YOUR MINOR'S PERSONAL INFORMATION**

#### **Enroll in Identity Monitoring**

We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling [TFN] or going to <https://response.idx.us/illuminate> 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 [Enrollment Deadline].

#### **Monitor Your Accounts**

Typically, credit reporting agencies do not have a credit report in a minor's name. To find out if your minor has a credit report or to request a manual search for your minor's Social Security number each credit bureau has its own process. To learn more about these processes or request these services, you may contact the credit bureaus by phone or in writing or you may visit the below websites:

Equifax	Experian	TransUnion
<a href="https://www.equifax.com/personal/education/identity-theft/child-identity-theft/">https://www.equifax.com/personal/education/identity-theft/child-identity-theft/</a>	<a href="http://www.experian.com/fraud/form-minor-child.html">www.experian.com/fraud/form-minor-child.html</a>	<a href="http://www.transunion.com/credit-disputes/child-identity-theft-inquiry-form">www.transunion.com/credit-disputes/child-identity-theft-inquiry-form</a>
1-800-685-1111	1-888-397-3742	1-888-909-8872
P.O. Box 105788 Atlanta, GA 30348-5788	P.O. Box 9554 Allen, TX 75013	P.O. Box 2000 Chester, PA 19016

To request information about the existence of a credit file in your minor's name, search for your minor's Social Security number, place a security freeze on your minor's credit file, place a fraud alert on your minor's credit report (if one exists), or request a copy of your minor's credit report you may be required to provide the following information:

- A copy of your driver's license or another government issued identification card, such as a state identification card, etc.;
- Proof of your address, such as a copy of a bank statement, utility bill, insurance statement, etc.;
- A copy of your minor's birth certificate;
- A copy of your minor's Social Security card;
- Your minor's full name, including middle initial and generation, such as JR, SR, II, III, etc.;
- Your minor's date of birth; and
- Your minor's previous addresses for the past two years.

#### **Additional Information**

We also recommend you review your minor's account statements from the past 12 to 24 months. If unauthorized activity is detected, notify law enforcement and the relevant financial institution. You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps individuals may take to protect 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 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 your minor experiences 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 your minor has 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.

## ***Exhibit A - Minor Letter***

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and [oag@dc.gov](mailto: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.oag.state.md.us](http://www.oag.state.md.us). Illuminate Education is located at 6531 Irvine Center Dr., Suite 100, Irvine, CA 92618.

*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; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. 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.