



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

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1275 Drummers Lane, Suite 302  
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December 11, 2017

**INTENDED FOR ADDRESSEE(S) ONLY**

**VIA U.S. MAIL AND EMAIL**

Office of the Attorney General  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100  
Email: [securitybreach@atg.wa.gov](mailto:securitybreach@atg.wa.gov)

Re: Notice of Data Event

Dear Sir or Madam:

We represent Combat Brands LLC, 15850 West 108<sup>th</sup> Street, Lenexa, KS 66219 (“Combat Brands”), and are writing to notify your office of an incident affecting Combat Brands’s e-commerce sites, [www.fightgear.com](http://www.fightgear.com), [www.fitness1st.com](http://www.fitness1st.com), [www.ringside.com](http://www.ringside.com), and [www.combatsports.com](http://www.combatsports.com), that may affect the security of personal information relating to certain Washington residents. By providing this notice, Combat Brands does not waive any rights or defenses regarding the applicability of Washington law, the applicability of the Washington data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On April 14, 2017, Combat Brands notified your office that it was the victim of a sophisticated cyber-attack that resulted in the potential compromise of some customers debit and credit card data used at [fightgear.com](http://fightgear.com), [fitness1st.com](http://fitness1st.com), [ringside.com](http://ringside.com), and [combatsports.com](http://combatsports.com) between July 1, 2015 and February 23, 2017. Combat Brands was working with a third-party forensic investigator at that time to determine what happened and what information had been potentially compromised. Combat Brands understood that the forensic investigator determined that it had removed all the malware at issue.

On October 6, 2017, while in the process of running routine scans, Combat Brands identified some unusual code that was running on its websites. After a brief internal investigation, Combat Brands

suspected that the investigator's claim that they had found and removed all the malware was incorrect and that their claim that the potential compromise of our customers' debit and credit cards stopped on February 23 was also incorrect. Combat Brands removed the suspicious malware on October 6, 2017.

Combat Brands immediately began working with a new third-party forensic investigator to determine what happened, what information was affected and to implement additional procedures to further protect the security of customer debit and credit cards. The new investigators confirmed Combat Brands' suspicion that the malware was not a new attack but that the malware already existed at the time of the original investigation and had not been removed as promised by the original investigators.

The new investigators confirmed that the previously unidentified malware had been removed by Combat Brands on October 6, 2017. The new investigator also determined that no other malware exists and that unauthorized access to customer debit or credit card information stopped on that day. The forensic investigator determined that customers can safely use their payment card at [fightgear.com](http://fightgear.com), [fitness1st.com](http://fitness1st.com), [ringside.com](http://ringside.com), and [combatsports.com](http://combatsports.com).

### **Notice to Washington Residents**

Through the ongoing third-party forensic investigations, Combat Brands confirmed on October 6, 2017 that malware may have stolen credit or debit card data from some credit and debit cards used at [www.fightgear.com](http://www.fightgear.com), [www.fitness1st.com](http://www.fitness1st.com), [www.ringside.com](http://www.ringside.com), and [www.combatsports.com](http://www.combatsports.com) between July 1, 2015 and October 6, 2017. The information at risk as a result of this event includes the cardholder's name, card number, expiration date and CVV. Combat Brands determined that personally identifiable information relating to an additional two hundred three (203) Washington residents may have been compromised. Combat Brands is providing written notice of this incident to these potentially impacted Washington residents beginning on or about November 29, 2017, in substantially the same form as the letter attached hereto as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Combat Brands has established a dedicated hotline for individuals to contact with questions or concerns regarding this incident. Additionally, Combat Brands is providing potentially impacted individuals with helpful information on how to protect against identity theft and fraud, including how to place a fraud alert and security freeze on one's credit file, the contact information for the national consumer reporting agencies, 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, state attorney general, and law enforcement to report attempted or actual identity theft and fraud. Combat Brands is also providing written notice of this incident to other state regulators and the national consumer reporting agencies as necessary.

Office of the Attorney General

December 8, 2017

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### Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4798.

Very truly yours,

A handwritten signature in black ink, appearing to read 'JEB', with a long horizontal flourish extending to the right.

James E. Prendergast of  
MULLEN COUGHLIN LLC

cc:

Office of the Attorney General

Consumer Protection Division

800 5<sup>th</sup> Ave., Suite 2000

Seattle, WA 98104-3188

Email: [securitybreach@atg.wa.gov](mailto:securitybreach@atg.wa.gov)

# **EXHIBIT A**



COMBAT BRANDS, LLC

Return Mail Processing Center  
P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>>  
<<Address 5>>  
<<City>><<State>><<Zip>>  
<<Country>>

<<Date>>

**Re: Notice of Data Breach**

Dear <<Name 1>>:

We recently learned that we were the victims of a sophisticated cyber-attack that may affect the security of your payment information. We are providing you with information about the incident, steps we are taking in response, and steps you can take to protect against fraud should you feel it is appropriate.

**What Happened?** On October 6, 2017, while in the process of running routine scans, we identified some unusual code that was running on our website. On that same day, we discovered that we were the victim of a sophisticated cyber-attack that resulted in the potential compromise of some customers' debit and credit card data used at [www.fightgear.com](http://www.fightgear.com), [www.fitness1st.com](http://www.fitness1st.com), [www.ringside.com](http://www.ringside.com), and [www.combatsports.com](http://www.combatsports.com) between July 1, 2015 and October 6, 2017.

Since that time, we have been working with third-party forensic investigators to determine what happened, what information was affected and to implement additional procedures to further protect the security of customer debit and credit cards. We removed the malware at issue to prevent any further unauthorized access to customer debit or credit card information. You can safely use your payment card at our websites.

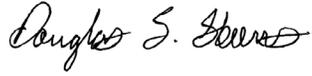
**What Information Was Involved?** Through the ongoing third-party forensic investigations, we confirmed on October 6, 2017 that malware may have stolen credit or debit card data from some credit and debit cards used at [www.fightgear.com](http://www.fightgear.com), [www.fitness1st.com](http://www.fitness1st.com), [www.ringside.com](http://www.ringside.com), and [www.combatsports.com](http://www.combatsports.com) between July 1, 2015 and October 6, 2017. The information at risk as a result of this event includes the cardholder's name, address, card number, expiration date and CVV.

**What We Are Doing.** We take the security of our customers' information extremely seriously, and we apologize for the inconvenience this incident has caused. We continue to work with third-party forensic investigators to ensure the security of our systems.

**What You Can Do.** Please review the enclosed Privacy Safeguards Information for additional information on how to better protect against identity theft and fraud. We encourage you to remain vigilant against incidents of identity theft by reviewing your account statements regularly and monitoring 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 bureaus. To order a 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 their credit report.

**For More Information.** We are very sorry for any inconvenience or concern this incident causes you. The security of your information is a priority for us. Should you have any questions about the content of this letter or ways you can better protect yourself from the possibility of identity theft, we encourage you to call the dedicated assistance line, staffed by professionals who are experienced in working through situations like this, at 888-396-9597 between 9:00 a.m. and 9:00 p.m. EST, Monday through Friday, excluding major holidays.

Sincerely,

A handwritten signature in black ink that reads "Douglas S. Skeens". The signature is written in a cursive style with a large initial 'D' and a stylized 'S'.

Doug Skeens  
President & CEO  
Combat Brands LLC

## PRIVACY SAFEGUARDS INFORMATION

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.

At no charge, you can also have these credit bureaus place a “fraud alert” on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax  
P.O. Box 105069  
Atlanta, GA 30348  
800-525-6285  
[www.equifax.com](http://www.equifax.com)

Experian  
P.O. Box 2002  
Allen, TX 75013  
888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion  
P.O. Box 2000  
Chester, PA 19022-2000  
800-680-7289  
[www.transunion.com](http://www.transunion.com)

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer’s credit report without the consumer’s written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, lift or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze  
P.O. Box 105788  
Atlanta, GA 30348  
1-800-685-1111  
(NY residents please call  
1-800-349-9960)  
[www.freeze.equifax.com](http://www.freeze.equifax.com)

Experian Security Freeze  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

TransUnion  
PO Box 2000  
Chester, PA 19022-2000  
1-888-909-8872  
[www.transunion.com/securityfreeze](http://www.transunion.com/securityfreeze)

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting 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); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. **For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at [www.ncdoj.gov](http://www.ncdoj.gov). **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at [www.riag.ri.gov](http://www.riag.ri.gov). A total of **Number** Rhode Island resident may be impacted by this incident. Customers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, customers will likely need to provide some kind of proof that they have been a victim. **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 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 violators. 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. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed as a result of a law enforcement investigation.



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