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November 13, 2015

Via E-mail (SecurityBreach@atg.wa.gov)
Via Overnight Mail

Office of the Attorney General
State of Washington
1125 Washington St SE
Olympia, WA 98504

Re: Incident Notification

Dear Sir or Madam:

Our client, Noble House Hotels and Resorts (Noble House) understands the importance of the privacy and confidentiality of personal information provided by its guests. Noble House began an investigation after it received calls from some of its guests who saw unauthorized charges on their payment cards used at certain Noble House properties. Noble House notified the FBI regarding the incident and engaged a computer security firm to examine its payment processing system. Through its investigation, Noble House learned that malware may have been installed on payment processing systems that potentially affected cards swiped at the following properties:

- The Portofino Hotel and Marina, Redondo Beach, CA, from April 3, 2015 to August 11, 2015;
- The Edgewater, Seattle, WA, from December 29, 2014 to August 11, 2015;
- Little Palm Island Resort and Spa, Florida Keys, FL, from December 29, 2014 to May 22, 2015;
- Mountain Lodge Telluride, Telluride, CO, from December 29, 2014 to May 27, 2015;
- Ocean Key Resort and Spa, Key West, FL, from December 29, 2014 to August 6, 2015;
- River Terrace Inn, Napa, CA, from December 29, 2014 to August 11, 2015.

The information potentially compromised by the malware involves data found in the magnetic stripe on payment cards, which includes the cardholder name, card number, expiration date, and CVV number.

Beginning on November 13, 2015, Noble House is notifying four thousand five hundred five (4,555) Washington residents pursuant to Washington law in substantially the same form

enclosed with this letter. Noble House has also established a dedicated call center to assist individuals with any questions they may have regarding the incident.

In addition to ensuring that this issue is fully remediated, Noble House has taken additional actions to strengthen and enhance the security of its system and conducted a review of its practices, policies, and procedures, and implemented enhanced measures to prevent something like this from happening in the future.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

Randal L. Gainer
Partner

Enclosure

NOBLE HOUSE
HOTELS & RESORTS

Return Mail Processing Center
PO Box 6336
Portland, OR 97228-6336

<<mail id>>
<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>><<State>><<Zip>>

<<Date>>

Dear <<First Name>> <<Last Name>>:

Noble House Hotels and Resorts (Noble House) values the relationship we have with our guests and understands the importance of protecting your personal information. We are writing to inform you about an incident that may involve some of your information.

Noble House began an investigation after we received calls from some of our guests who saw unauthorized charges on their payment cards used at certain Noble House properties. We notified the FBI regarding the incident and engaged a computer security firm to examine our payment processing system. Through our investigation, Noble House learned that malware may have been installed on payment processing systems that potentially affected cards swiped at the following properties:

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While we have seen only a few instances of fraudulent activity, we are notifying you about this incident so you can take appropriate steps to protect your payment card account. We recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your account statements for any unauthorized activity. You should immediately report any unauthorized charges to your financial institution because the major credit card companies have rules that restrict them from requiring you to pay for fraudulent charges that are reported in a timely manner.

If you incurred costs that your financial institution declined to reimburse related to fraudulent charges on a payment card you used at one of the above properties, please contact us at the number below. We will reimburse you for any such reasonable, documented costs that your financial institution declined to pay.

We regret any inconvenience or concern this may have caused. To help prevent this from happening again, we have been working with the computer security firm to review our security measures, ensure that this issue has been fully remediated, and look for ways to enhance our security measures. If you have any questions, or you need further assistance, please call (888) 287-9902, Monday through Friday between the hours of 9am and 9pm EST.

Sincerely,

Patrick R. Colee
Chairman
Noble House Hotels & Resorts

More Information About Ways to Protect Yourself

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax, PO Box 740256, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
Experian, PO Box 9554, Allen, TX 75013 www.experian.com, 1-888-397-3742
TransUnion, PO Box 1000, Chester, PA 19022 www. transunion.com, 1-800-888-4213

You should remain vigilant with respect to reviewing your account statements and credit reports, and you should promptly report any suspicious activity or suspected identity theft to us and to the proper law enforcement authorities, including local law enforcement, your state's attorney general, and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding and protection against identity theft: Federal Trade Commission, Consumer Response Center 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft. Please note that this notice was not delayed because of a law enforcement investigation.

Fraud Alerts: There are also two types of fraud alerts that you can place on your credit report to put your creditors on notice that you may be a victim of fraud: an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies at the toll-free numbers listed below:

Equifax	Experian	TransUnion
877-478-7625	888-397-3742	800-680-7289

Credit Freezes: You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally $5 to $20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified above to find out more information.

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

NOBLE HOUSE
HOTELS & RESORTS

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PO Box 6336
Portland, OR 97228-6336

<<mail id>>
<<First Name>> <<Last Name>>
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