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CONSUMER PROTECTION DIVISION

SEATTLE

ATTORNEY GENERAL
STATE OF WASHINGTON
OSE/OLYMPIA

PO Box 31759 St. Louis, MO 63131-0759

September 25, 2015

Office of the Attorney General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100

To Whom It May Concern:

I am writing on behalf of Scottrade Financial Services, Inc. ("Scottrade"). This letter is to inform you of a data security incident that may have affected the contact information of approximately 812 Scottrade clients, including 18 residents of Washington.

As part of a normal reconciliation process, in July 2015, Scottrade provided revised 1099 forms for the tax years 2012 and 2013 to approximately 18,000 clients. These forms were mailed by a vendor, Wall Street Concepts (WSC). WSC inadvertently mailed 1258 of these forms using addresses that Scottrade clients had provided for the 2012 and/or 2013 tax years, and which had not been updated to reflect changes of address. As a result these mailings were sent to old and outdated addresses. 428 of those have now been returned to our offices as undeliverable, leaving 812 with unknown outcomes. Those 1099 forms contained the client's name, address, eight-digit Scottrade account number and the last four digits of their Social Security Number. Scottrade became aware of the situation when contacted by clients who had become aware of mail being sent to their old addresses. Our investigation has determined that the address problem was limited to the 1240 client accounts which have been identified. The cause of the discrepancy has been located and Scottrade is taking corrective action.

Many of the forms undoubtedly arrived at the correct location, but because we cannot verify who received and opened those documents, we are acting proactively to alert clients and regulators of this incident and provide clients with the necessary information to protect credit and identity. Scottrade is providing notification about the incident to the 812 Scottrade clients from the relevant time period. A copy of the notification letter is attached. Further, as a precaution, Scottrade has also arranged to offer one year of free credit monitoring and ID theft services provided by Equifax.

Scottrade has no reason to believe that this mailing has resulted in any harm to clients. Scottrade has not seen any indication of an increased level of fraudulent activity or unauthorized actions with regard to client accounts now or with respect to the relevant time period.

If you have any questions regarding this matter, please contact me.

Sincerely,

Corrine Muller
Assistant Vice President Regulatory Affairs
(314) 965-1555 Ext 2137



[Date]

Re: Your account *****XXX

Dear Client,

We are writing to share with you important information about your corrected 1099 for the tax years 2012 and/or 2013.

What Happened

Earlier this summer, our mailing vendor mailed corrected 1099 forms for tax years 2012 and 2013 on our behalf. Your corrected tax form(s) were included in that mailing. Your information inadvertently went to your older address rather than to the current mailing address we have on file. As with all 1099 forms, that document contained your name, address, eight-digit Scottrade account number and the last four digits of your Social Security number.

It is important to note that there is no indication of fraudulent activity related to this issue. Because we are unable to verify that you had mail forwarding in place at the time of the mailing, we are proactively notifying you and providing you with information to help you protect your credit and identity.

In addition, we are in the process of resending your corrected 1099(s) to this address, the current mailing address we have on file. You should receive it in the next 2 to 3 weeks.

What You Can Do

As always, we encourage you to regularly review your Scottrade and other financial accounts and report any suspicious or unrecognized activity immediately. In accordance with Interagency Guidance from federal banking agencies, you should remember to be vigilant for the next 12 to 24 months and report any suspected incidents of fraud to us or the relevant financial institution. Please also read the important information attached to this letter on ways to protect yourself from identity theft.

We encourage clients to be particularly vigilant against schemes seeking to trick you into revealing personal information. Never confirm or provide personal information such as passwords or account information to anyone contacting you. Please know that Scottrade will never send you any unsolicited correspondence asking you for your account number, password or other private information. If you receive any letter or email requesting this information, it is fraudulent and we ask that you report it to us at phishing@scottrade.com. Be cautious about opening attachments or links from emails, regardless of who appears to have sent them.

Additional Steps

Attached to this letter are additional steps you could consider at any time if you ever suspect you've been the victim of identity theft. We offer this out of an abundance of caution, so that you have the information you need to protect yourself.

As a precaution, Scottrade has arranged with Equifax Personal Solutions to help you protect your identity and your credit information for one year at no cost to you. The steps to follow are included on the following pages. If you have any questions about this incident, please do not hesitate to reach out to us at 800.619.7283.*

Sincerely,
Scottrade, Inc.

*If you are working with an independent registered investment advisor, please contact your advisor for further assistance.

Equifax Credit Watch Offer

Activation Code: [Gen Data Field 1]

We have arranged with Equifax Personal Solutions to help you protect your identity and your credit information at no cost to you.

Enroll in Equifax Credit Watch™ Silver

Equifax Credit Watch will provide you with an "early warning system" to changes to your credit file and help you to understand the content of your Equifax credit file. The key features and benefits are listed below.

Equifax Credit Watch provides you with the following benefits:

- Comprehensive credit file monitoring of your Equifax credit report with daily notification of key changes to your credit file.
- Wireless alerts and customizable alerts available
- One copy of your Equifax Credit Report™
- \$25,000 in identity theft insurance with \$0 deductible, at no additional cost to you †
- 24 by 7 live agent Customer Service to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance and in initiating an investigation of inaccurate information.
- 90 day Fraud Alert placement with automatic renewal functionality *

How to Enroll

To sign up online for online delivery go to www.myservices.equifax.com/silver

1. **Welcome Page:** Enter the Activation Code provided at the top of your letter in the "Activation Code" box and click the "Submit" button.
2. **Register:** Complete the form with your contact information (name, gender, home address, date of birth, Social Security number and telephone number) and click the "Continue" button.
3. **Create Account:** Complete the form with your email address, create a User Name and Password, check the box to accept the Terms of Use and click the "Continue" button.
4. **Verify ID:** The system will then ask you up to four security questions to verify your identity. Please answer the questions and click the "Submit Order" button.
5. **Order Confirmation:** This page shows you your completed enrollment. Please click the "View My Product" button to access the product features.

† Identity Theft Insurance underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

This product is not intended for minors (under 18 years of age).

* The Automatic Fraud Alert feature made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC

Important Identity Theft Information: Additional Steps You Can Take to Protect Your Identity

The following are steps you may wish to take to protect your identity.

Review Your Accounts and Credit Reports

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, P.O. Box 740241, Atlanta, Georgia 30374-0241. 1-800-685-1111. www.equifax.com
- Experian, P.O. Box 9532, Allen, TX 75013, 1-888-397-3742. www.experian.com
- TransUnion, P.O. Box 6790, Fullerton, CA 92834-6790. 1-800-916-8800. www.transunion.com

Consider Placing a Fraud Alert

You may wish to consider contacting the fraud department of the three major credit bureaus to request that a "fraud alert" be placed on your file. A fraud alert notifies potential lenders to verify your identification before extending credit in your name.

Equifax: Report Fraud: 1-800-525-6285

Experian: Report Fraud: 1-800-397-3742 or 1-888-397-3742 (outside the U.S.)

TransUnion: Report Fraud: 1-800-680-7289

Security Freeze for Credit Reporting Agencies

You may wish to request a security freeze on your credit reports. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware 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 reporting agency with a valid police report, it cannot charge you to place, lift or remove a security freeze. In all other cases, a credit reporting agency may charge you up to \$10.00 each to place, temporarily lift, or permanently remove a security freeze.

To place a security freeze on your credit report, you must send a written request to each of the three major consumer reporting agencies by regular, certified or overnight mail at the following addresses:

- Equifax Security Freeze, P.O. Box 105788, Atlanta, GA 30348
- Experian Security Freeze, P.O. Box 9554, Allen, TX 75013
- TransUnion Security Freeze, Fraud Victim Assistance Department, P.O. Box 6790, Fullerton, CA 92834

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

- Your full name (including middle initial, Jr., Sr., Roman numerals, etc.),
- Social Security number
- Date of birth
- Address(es) where you have lived over the prior five years
- Proof of current address such as a current utility bill
- A photocopy of a government-issued ID card
- 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
- If you are not a victim of identity theft, include payment by check, money order, or credit card (Visa, MasterCard, American Express or Discover only). Don't send cash through the mail.

The credit reporting agencies have three business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the freeze to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include (1) proper identification (name, address, and Social Security number), (2) the PIN number or password provided to you when you placed the security freeze; and (3) the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze all together, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three business days after receiving your request to remove the security freeze.

Suggestions if You Are a Victim of Identity Theft

- File a police report. Get a copy of the report to submit to your creditors and others that may require proof of a crime.
- Contact the U.S. Federal Trade Commission (FTC). The FTC provides useful information to identity theft victims and maintains a database of identity theft cases for use by law enforcement agencies. File a report with the FTC by calling the FTC's Identity Theft Hotline: 1-877-IDTHEFT (438-4338); online at <http://www.ftc.gov/bcp/edu/microsites/idtheft/>; or by mail at Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Ave., N.W., Washington, D.C. 20580. Also request a copy of the publication, "Take Charge: Fighting Back Against Identity Theft" from <http://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idth04.pdf>.
- Keep a record of your contacts. Start a file with copies of your credit reports, the police reports, any correspondence, and copies of disputed bills. It is also helpful to keep a log of your conversations with creditors, law enforcement officials, and other relevant parties.

Take Steps to Avoid Identity Theft

Further information can be obtained from the FTC about steps to take to avoid identity theft through the following paths: <http://www.ftc.gov/bcp/edu/microsites/idtheft/>; calling 1-877-IDTHEFT (438-4338); or write to Consumer Response Center, Federal Trade Commission, 600 Pennsylvania Ave., N.W., Washington, D.C. 20580.

Maryland residents can learn more about preventing identity theft from the Maryland Office of the Attorney General, by visiting their web site at <http://www.oag.state.md.us/idtheft/index.htm>, calling the Identity Theft Unit at 410-567-6491, or requesting more information at the Identity Theft Unit, 200 St. Paul Place, 16th Floor, Baltimore, MD 21202.

North Carolina residents can learn more about preventing identity theft from the North Carolina Office of the Attorney General, by visiting their web site at <http://www.ncdoj.gov/Help-for-Victims/ID-Theft-Victims.aspx>, calling (919) 716-6400 or requesting more information from the North Carolina Attorney General's Office, 9001 Mail Service Center Raleigh, NC 27699-9001.

Vermont residents may learn helpful information about fighting identity theft, placing a security freeze, and obtaining a free copy of your credit report is available on the Vermont Attorney General's website at <http://www.atg.state.vt.us>