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August 12, 2016

**VIA EMAIL (SECURITYBREACH@ATG.WA.GOV)
AND OVERNIGHT MAIL**

Attorney General Bob Ferguson
Office of the Washington Attorney General
Consumer Protection Division
800 5th Ave, Suite 2000
Seattle, WA 98104-3188

Re: Incident Notification

Dear Attorney General Ferguson:

On June 13, 2016, Valley Anesthesiology Consultants, Inc., d/b/a Valley Anesthesiology and Pain Consultants (“VAPC”) learned that a third party may have gained unauthorized access to the VAPC computer systems on March 30, 2016. Upon learning of the situation, VAPC immediately began an investigation, including hiring a leading forensics firm to assist VAPC and notifying law enforcement. The forensics firm found no evidence that the VAPC computer systems were accessed, but was unable to definitively rule that out. The computer systems contained patient name, physicians’ name, date of services, name of health insurer, insurance identification number, place of treatment, Social Security number and diagnosis and treatment codes.

VAPC is offering affected individuals a free one-year membership in credit monitoring and identity theft protection services through Experian. VAPC has established a dedicated call center that potentially affected individuals can contact with questions. To help prevent something like this from happening in the future, VAPC is taking steps to enhance the security of its computer systems, including reviewing its security processes, strengthening its network firewalls, and continuing to incorporate best practices in IT Security.

On August 12, 2016, VAPC is mailing notifications to 611 Washington residents pursuant to the requirements of the Health Insurance Portability and Accountability Act

Attorney General Bob Ferguson
August 12, 2016
Page 2

("HIPAA"), 45 C.F.R. §§ 164.400-414 in substantially the same form as the document enclosed herewith.¹

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

Sincerely,

A handwritten signature in black ink that reads "Lynn Sessions". The signature is written in a cursive style with a large initial "L".

Lynn Sessions
Partner

Enclosures

¹ As VAPC does not conduct business in Washington, this letter is not, and does not constitute, a waiver of personal jurisdiction.



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

<<mail id>>
<<First Name>> <<Last Name>>
<<Street Address>>
<<City>><<State>><<Zip>>

<<Date>>

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

As a provider of anesthesia and pain management services to patients in the Greater Phoenix area, Valley Anesthesiology and Pain Consultants (“VAPC”) – formerly known as Valley Anesthesiology Consultants Ltd. – is committed to maintaining the privacy and security of our patients’ information. Regrettably, we are writing to inform you of an incident involving some of that information and to share with you the steps we are taking to address it.

On June 13, 2016, we learned that a third party may have gained unauthorized access to the VAPC computer systems on March 30, 2016. Upon learning of the situation, we immediately began an investigation, including hiring a leading forensics firm to assist us, and notifying law enforcement. The forensics firm found no evidence that the information on the computer systems was accessed, but was unable to definitively rule that out. The computer systems may contain some of your information, such as your name, providers’ names, date of service, place of treatment, diagnosis and treatment codes, and your Medicare number, which may include your social security number. Your financial information was not included in these computer systems.

Currently, we have no evidence that any of your information has been accessed or used inappropriately. However, because we value our relationship with you, we are offering you a free, one-year membership to Experian’s® ProtectMyID® Alert. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. Experian’s® ProtectMyID® Alert is completely free to you, and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and Experian’s® ProtectMyID® Alert, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter. We also recommend that you review the explanation of benefits statements that you receive from Medicare. If you see services that you did not receive, please contact Medicare immediately.

We deeply regret any inconvenience or concern this may cause you. To help prevent something like this from happening in the future, we are taking steps to enhance the security of our computer systems, including reviewing our security processes, strengthening our network firewalls, and continuing to incorporate best practices in IT security. Should you have any questions, please call 1-888-839-9460, from 6 a.m. to 6 p.m. Pacific Time, Monday through Friday.

Sincerely,

A handwritten signature in cursive script that reads "Aubrey Maze".

Aubrey Maze, MD
Chief Executive Officer
Valley Anesthesiology and Pain Consultants

Activate ProtectMyID Now in Three Easy Steps

1. ENSURE That You Enroll By: November 13, 2016 (Your code will not work after this date.)
2. VISIT the ProtectMyID Web Site to enroll: www.protectmyid.com/redeem
3. PROVIDE Your Activation Code: <<code>>

If you have questions or need an alternative to enrolling online, please call 877-288-8057 and provide engagement #: **PC103229**

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH PROTECTMYID MEMBERSHIP:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- **Free copy of your Experian credit report**
- **Surveillance Alerts for:**
 - Daily Bureau Credit Monitoring: Alerts of key changes & suspicious activity found on your Experian, Equifax® and TransUnion® credit reports.
- **Identity Theft Resolution & ProtectMyID ExtendCARE:** Toll-free access to US-based customer care and a dedicated Identify Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.
 - It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.
- **\$1 Million Identity Theft Insurance*:** Immediately covers certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.

Activate your membership today at www.protectmyid.com/redeem or call 877-288-8057 to register with the activation code above.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

Even if you choose not to take advantage of this free credit monitoring service, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting agencies. To order your credit report, free of charge, once every twelve months, please visit www.annualcreditreport.com or call toll-free at 1-877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

Equifax
PO Box 740241
Atlanta, GA 30374
www.equifax.com
1-800-685-1111

Experian
PO Box 2002
Allen, TX 75013
www.experian.com
1-888-397-3742

TransUnion
PO Box 1000
Chester, PA 19016
www.transunion.com
1-800-916-8800

If you believe that you are the victim of identity theft or have reason to believe that your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Office of the Attorney General in your home state. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
www.ftc.gov/idtheft
1-877-438-4338

You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records.

*Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of AIG. 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.



Return Mail Processing Center
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<<mail id>>
To the Parent or Guardian of
<<First Name>> <<Last Name>>
<<Street Address>>
<<City>><<State>><<Zip>>

<<Date>>

Dear Parent or Guardian of <<First Name>> <<Last Name>>:

As a provider of anesthesia and pain management services to patients in the Greater Phoenix area, Valley Anesthesiology and Pain Consultants (“VAPC”) – formerly known as Valley Anesthesiology Consultants Ltd. – is committed to maintaining the privacy and security of our patients’ information. Regrettably, we are writing to inform you of an incident involving some of that information and to share with you the steps we are taking to address it.

On June 13, 2016, we learned that a third party may have gained unauthorized access to the VAPC computer systems on March 30, 2016. Upon learning of the situation, we immediately began an investigation, including hiring a leading forensics firm to assist us, and notifying law enforcement. The forensics firm found no evidence that the information on the computer systems was accessed, but was unable to definitively rule that out. The computer systems may contain some of your child’s information, such as your child’s name, providers’ names, date of service, place of treatment, diagnosis and treatment codes, and Medicare number, which may include your child’s social security number. Your child’s financial information was not included in these computer systems.

Currently, we have no evidence that any of your child’s information has been accessed or used inappropriately. However, because we value our relationship with you, we are offering you, the parent or guardian, a free, one-year membership to Experian’s® FamilySecure®. FamilySecure® monitors your Experian credit report to remind you of key changes. In addition FamilySecure® will tell you if your child has a credit report, a potential sign that his or her identity has been stolen. For more information on FamilySecure®, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in the next page of the letter. We also recommend that you review the explanation of benefits statements that you receive from Medicare. If you see services that your child did not receive, please contact Medicare immediately.

We deeply regret any inconvenience or concern this may cause you. To help prevent something like this from happening in the future, we are taking steps to enhance the security of our computer systems, including reviewing our security processes, strengthening our network firewalls, and continuing to incorporate best practices in IT security. Should you have any questions, please call 1-888-839-9460, from 6 a.m. to 6 p.m. Pacific Time, Monday through Friday.

Sincerely,

Aubrey Maze, MD
Chief Executive Officer
Valley Anesthesiology and Pain Consultants

To receive the complimentary Family Secure product, you as the parent must enroll at the web site with your activation code listed below. This activation code can only be used by the parent or guardian of the minor. Please keep in mind that once activated, the code cannot be re-used for another enrollment.

Activate Family Secure Now in Three Easy Steps

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2. VISIT the Family Secure Web Site to enroll: <http://www.familysecure.com/enroll>
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If you have questions or need an alternative to enrolling online, please call (877) 288-8057 and provide engagement #: **PC103230**

Your complimentary one-year Family Secure membership includes:

Parent or Legal Guardian:

- Daily monitoring of your Experian credit report with email notification of key changes, as well as monthly “no-hit” reports
- 24/7 credit report access: Unlimited, on-demand Experian reports and scores
- Experian credit score illustrator to show monthly score trending and analysis

Children:

- Monthly monitoring to determine whether enrolled minors in your household have an Experian credit report
- Alerts of key changes to your children’s Experian credit report

All Members:

- Identity Theft Resolution assistance: Toll-free access to US-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies
- \$2,000,000 Product Guarantee*

Once your enrollment in Family Secure is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about Family Secure, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian’s customer care team at 877-288-8057.

Even if you choose not to take advantage of this free monitoring service, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting agencies. To order a credit report, free of charge once every 12 months, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

Equifax
PO Box 740241
Atlanta, GA 30374
www.equifax.com
1-800-525-6285

Experian
PO Box 2002
Allen, TX 75013
www.experian.com
1-888-397-3742

TransUnion
PO Box 2000
Chester, PA 19016
www.transunion.com
1-800-680-7289

If you believe you or your child are the victim of identity theft or have reason to believe your or your child’s personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General’s office in your home state. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
www.ftc.gov/idtheft
1-877-438-4338

You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records.

* The Family Secure Product Guarantee is not available for Individuals who are residents of the state of New York.



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

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Currently, we have no evidence that any of your information has been accessed or used inappropriately. However, because we value our relationship with you, we are offering you a free, one-year membership to Experian’s® ProtectMyID® Alert. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. Experian’s® ProtectMyID® Alert is completely free to you, and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and Experian’s® ProtectMyID® Alert, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter. We also recommend that you review the explanation of benefits statements that you receive from your health insurer. If you see services that you did not receive, please contact your health insurer immediately.

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Sincerely,

Aubrey Maze, MD
Chief Executive Officer
Valley Anesthesiology and Pain Consultants

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Even if you choose not to take advantage of this free credit monitoring service, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting agencies. To order your credit report, free of charge, once every twelve months, please visit www.annualcreditreport.com or call toll-free at 1-877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

Equifax	Experian	TransUnion
PO Box 740241	PO Box 2002	PO Box 1000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016
www.equifax.com	www.experian.com	www.transunion.com
1-800-685-1111	1-888-397-3742	1-800-916-8800

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600 Pennsylvania Avenue, NW
Washington, DC 20580
www.ftc.gov/idtheft
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You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records.

* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of AIG. 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.



Return Mail Processing Center
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<<mail id>>
To the Parent or Guardian of
<<First Name>><<Last Name>>
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<<Date>>

Dear Parent or Guardian of <<First Name>> <<Last Name>>:

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Currently, we have no evidence that any of your child’s information has been accessed or used inappropriately. However, because we value our relationship with you, we are offering you, the parent or guardian, a free, one-year membership to Experian’s® FamilySecure®. FamilySecure® monitors your Experian credit report to remind you of key changes. In addition FamilySecure® will tell you if your child has a credit report, a potential sign that his or her identity has been stolen. For more information on FamilySecure®, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in the next page of the letter. We also recommend that you review the explanation of benefits statements that you receive from your child’s health insurer. If you see services that your child did not receive, please contact the health insurer immediately.

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Aubrey Maze, MD
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Valley Anesthesiology and Pain Consultants

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Parent or Legal Guardian:

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- \$2,000,000 Product Guarantee*

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* The Family Secure Product Guarantee is not available for Individuals who are residents of the state of New York.