

**McDonald Hopkins**

A business advisory and advocacy law firm®

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September 4, 2020

**VIA U.S. MAIL**

Office of Washington Attorney General  
Consumer Protection Division  
800 5<sup>th</sup> Ave., Suite 2000  
Seattle, WA 98104-3188

**Re: Navy League of the United States – Incident Notification**

Dear Sir or Madam:

McDonald Hopkins PLC represents Navy League of the United States (“Navy League”). I am writing to provide notification of an incident at Blackbaud, a third party service provider, that may affect the security of personal information of one thousand three hundred ninety eight (1,398) Washington residents. Navy League uses Navy League uses a Blackbaud application, and Blackbaud recently experienced an incident impacting that application. Navy League was one of many nonprofits that were a part of this incident. Navy League’s investigation is ongoing and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Navy League does not waive any rights or defenses regarding the applicability of Washington law or personal jurisdiction.

On July 16, 2020, Blackbaud notified Navy League of a security incident affecting educational institutions and other nonprofits across the United States. Upon learning of the issue, Navy League commenced an investigation, which is still ongoing. Blackbaud reported to Navy League that Blackbaud identified an attempted ransomware attack in progress on May 20, 2020. Blackbaud informed Navy League that they stopped the ransomware attack with the help of forensics experts and law enforcement, and that they prevented the cybercriminal from blocking or accessing encrypted files that contain sensitive data. Blackbaud engaged forensic experts to assist in their internal investigation. That investigation concluded that the cybercriminal removed data from Blackbaud’s systems intermittently between February 7, 2020 and May 20, 2020. A backup file containing certain information was removed by the cybercriminal. According to Blackbaud, they paid the cybercriminal to ensure that the backup file was permanently destroyed.

Navy League learned on August 27, 2020 that it is possible that the cybercriminal may have gained access to the Washington residents’ names and dates of birth. The cybercriminal did

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not access financial account information, credit card account information or social security number information because Navy League does not maintain this information.

Navy League has no indication that any of the information has been misused. Nevertheless, out of an abundance of caution, Navy League wanted to inform you (and the affected residents) of the incident and to explain the steps that it is taking to help safeguard the affected residents against identity fraud. Navy League is providing the affected residents with written notification of this incident commencing on or about September 4, 2020 in substantially the same form as the letter attached hereto. Navy League is advising the affected residents about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. The affected residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At Navy League, protecting the privacy of personal information is a top priority. Navy League is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Navy League continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions regarding this notification, please contact me at 248.220.1356 or [dpaluzzi@mcdonaldhopkins.com](mailto:dpaluzzi@mcdonaldhopkins.com).

Sincerely,



Dominic A. Paluzzi

Encl.



**IMPORTANT INFORMATION  
PLEASE REVIEW CAREFULLY**

Dear [REDACTED]:

The privacy and security of the personal information we maintain is of the utmost importance to the Navy League of the United States. We are writing with important information regarding a recent data security incident at Blackbaud, a third party service provider, which may have involved some of the information that you provided to Navy League of the United States. Blackbaud is a software and service provider that is widely used for fundraising and alumni or donor engagement efforts at non-profits and universities world-wide. Navy League of the United States uses one or more Blackbaud applications, and Blackbaud recently experienced an incident impacting that application. We want to provide you with information about the incident and let you know that we continue to take significant measures to protect your information.

What Happened?

On July 16, 2020, Blackbaud notified Navy League of the United States of a security incident that impacted its clients across the world. Blackbaud reported to us that they identified an attempted ransomware attack in progress on May 20, 2020. Blackbaud informed us that they stopped the ransomware attack and engaged forensic experts to assist in their internal investigation. That investigation concluded that the threat actor intermittently removed data from Blackbaud's systems between February 7, 2020 and May 20, 2020. According to Blackbaud, they paid the threat actor to ensure that the data was permanently destroyed.

What We Are Doing.

Upon learning of the issue, we commenced an immediate and thorough investigation. That investigation is still ongoing. As part of our investigation, in addition to demanding detailed information from Blackbaud about the nature and scope of the incident, we engaged cybersecurity professionals experienced in handling these types of incidents.

What Information Was Involved.

On August 13, 2020 we determined that the information removed by the threat actor may have contained some of your personal information, including your full name and date of birth. **Your Social Security number, financial account information and/or payment card information were not exposed, as they were**



**encrypted.** Your demographic information, contact information, and/or philanthropic giving history, such as donation dates and amounts, may have also been removed by the threat actor.

*What You Can Do.*

**According to Blackbaud, there is no evidence to believe that any data will be misused, disseminated, or otherwise made publicly available. Blackbaud indicates that it has hired a third-party team of experts, including a team of forensics accountants, to continuing monitoring for any such activity.** Nevertheless, out of an abundance of caution, we want to make you aware of the incident. This letter provides precautionary measures that you can take to protect your personal information, including placing a fraud alert and/or security freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis and report any suspicious activity to the proper authorities.

*For More Information.*

We remain fully committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. Blackbaud has assured us that they closed the vulnerability that allowed the incident and that they are enhancing their security controls and conducting ongoing efforts against incidents like this in the future. We continually evaluate and modify our practices, and those of our third party service providers, to enhance the security and privacy of your personal information.

**For questions regarding this incident, please contact** [REDACTED]  
[REDACTED]

Sincerely,

[REDACTED]

Navy League of the United States

– OTHER IMPORTANT INFORMATION –

**1. Placing a Fraud Alert on Your Credit File.**

You may place an initial ~~one~~ (1) year “fraud alert” on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

**Equifax**  
P.O. Box 105069  
Atlanta, GA 30348  
[www.equifax.com](http://www.equifax.com)  
1-800-525-6285

**Experian**  
P.O. Box 2002  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)  
1-888-397-3742

**TransUnion LLC**  
P.O. Box 2000  
Chester, PA 19016  
[www.transunion.com](http://www.transunion.com)  
1-800-680-7289

**2. Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a “security freeze” be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

**Equifax Security Freeze**  
PO Box 105788  
Atlanta, GA 30348  
<https://www.freeze.equifax.com>  
1-800-349-9960

**Experian Security Freeze**  
PO Box 9554  
Allen, TX 75013  
<http://experian.com/freeze>  
1-888-397-3742

**TransUnion Security Freeze**  
P.O. Box 2000  
Chester, PA 19016  
<http://www.transunion.com/securityfreeze>  
1-888-909-8872

In order to place the security freeze, you’ll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name, or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

**3. Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **[www.annualcreditreport.com](http://www.annualcreditreport.com)**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

**4. Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.