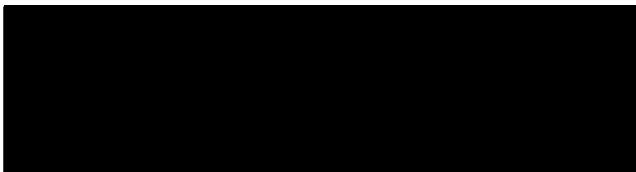




17357

TBG West

July 2, 2020



Dear [REDACTED]

This letter follows up on our telephone call on July 2, 2020, regarding a recent incident that involves the personal information of certain employees or other persons associated with Cadwalader, Wickersham & Taft LLP. Although we have no reason to believe that any personal information has been misused for the purpose of committing fraud or identity theft, we are writing to advise you about the incident and the steps that Frederick W. Howarth III d/b/a TBG West Insurance Services ("TBG West") has taken to address the incident.

In spite of our past actions to continuously harden and safeguard our systems against potential intrusion, unfortunately, on March 27, 2020, we discovered that our system was impacted by a ransomware event that encrypted certain files on our systems. Upon learning of the situation, we promptly launched an internal investigation and retained a leading cybersecurity firm to investigate the incident and confirm the security of our systems. Additionally, we remediated the situation and have taken steps to prevent a recurrence of a similar incident, including installing Carbon Black endpoint monitoring and have engaged with an outside vendor for additional 24/7/365 security monitoring of our systems. We have also undertaken move our on-premise Exchange server to Microsoft 365 (formerly Office 365) serviced by Intermedia to obtain improved filtering of email messages. TBG West also notified law enforcement, including the FBI, and we are cooperating with law enforcement's ongoing investigation.

In the course of our investigation, we learned that some files were copied from our system in connection with the attack. We reviewed the contents of those files, and recently determined that a limited number of documents contained some personal information of your employees or other persons associated with Cadwalader, Wickersham & Taft LLP. The personal information consists of names, and, depending on the person, Social Security numbers for those 1,436 affected individuals. The names of the affected persons have been included in a list provided separately to Cadwalader, Wickersham & Taft LLP via a secured file share.

As we discussed during our recent call, we would like to further discuss the process for notifying the affected individuals. At your option, TBG West can provide such notification directly to the affected persons at TBG West's expense. Alternatively, TBG West can assist you in notifying the impacted individuals. Enclosed is a sample notification letter that TBG West is prepared to send to the affected persons. Please let us know if you have any changes to the letter or if you have any changes to the notification list.

Disability and Long Term Care Specialists

6077 Bristol Parkway • Culver City, CA 90230 • Phone (310) 573-7410 • Fax (310) 573-7401

TBG West

Additionally, as indicated in the enclosed notification letter, TBG West is willing to arrange for credit monitoring and identity theft protection services through Experian for the affected persons. The cost of these services will be paid by TBG West, and instructions for enrolling in these services will be included in the letter provided to the affected individuals.

TBG West again apologizes for any inconvenience or concern that this incident might cause Cadwalader, Wickersham & Taft LLP and its affected employees or other affiliated persons. Please contact me or Brian Cox, Senior Director of Client Services, at your earliest convenience to discuss possible next steps with regard to this matter.

Sincerely,

Fred Howarth, CLTC, GBDS
Disability Specialist
TBG West
6077 Bristol Parkway
Culver City, CA 90230
Direct (310) 454-9472
Fax (310) 573-7401
Email: fhowarth@tbgwest.com

Enclosure



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

Frederick W. Howarth III d/b/a TBG West Insurance Services specializes in designing, implementing, and administering disability, long-term care, and group life insurance solutions for company clients. As a part of our relationship with our company clients, we are a broker for disability, long-term care, and group life insurance coverage, and we hold individual insureds' personal information. The below-detailed incident did not impact any of our company clients.

We value and respect the privacy of your information, which is why we are writing to advise you of a recent incident that may have involved some of your personal information. On March 27, 2020, our system was impacted by a ransomware event that encrypted certain files. Upon learning of the situation, we promptly investigated the incident with the help of a leading cybersecurity firm and have taken steps to prevent any recurrence. We also notified law enforcement and are cooperating with its investigation.

In the course of our investigation, we learned that some files were copied from our system in connection with the attack. We reviewed the contents of all files that may have been acquired. On or around June 10, 2020, we determined that a limited number of documents that may have been acquired contained some personal information, including your name, date of birth, and Social Security number. We then worked diligently to locate additional, necessary information for mailing, which was completed on June 30, 2020.

We are not aware of any instances of fraud or identity theft arising out of this situation and do not know for certain if your personal information was ever acquired. However, out of an abundance of caution, we wanted to make you aware of the incident and are offering a complimentary two-year membership of Experian IdentityWorksSM Credit 3B. 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. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. **Coverage is not automatic, and you must complete the enrollment process in order to activate your membership. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary, two-year membership, please see the additional information attached to this letter.**

We value the trust you place in us to protect your privacy, take our responsibility to safeguard personal information seriously, and apologize for any inconvenience or concern this incident might cause. For further information and assistance, please call 1-844-952-2221 from 9:00 a.m. to 6:30 p.m. Eastern Time, Monday through Friday.

Sincerely,

TBG West Insurance Services

Activate IdentityWorks Credit 3B

To help protect your identity, we are offering a **complimentary** two-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: <<b2b_text_1 (Date)>> (Your code will not work after this date.)
2. VISIT the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the Activation Code: <<Member ID>>

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number <<b2b_text_2 (Engagement #)>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877-288-8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, 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.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (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.

Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. Massachusetts law also allows consumers to place a security freeze on their credit reports. A security freeze can be placed without any charge. 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.

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 addresses below or, if available, comply with the consumer reporting agencies' online security freeze request procedures:

Equifax
1-866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian Security Freeze
1-888-397-3742
www.experian.com
P.O. Box 9554
Allen, TX 75013

Trans Union Security Freeze
1-888-909-8872
www.transunion.com
P.O. Box 160
Woodlyn, PA 19094

In order to request a security freeze, you may need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security Number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address such as a current utility bill or telephone bill;
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.); and
7. 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.

The credit reporting agencies have three (3) 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 (5) 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 security freeze in order 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 or, if available, comply with the consumer reporting agencies' online procedures for lifting a security freeze, 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 as well as 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 up to three (3) 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, you must send a written request to each of the three credit bureaus by mail or, if available, comply with the consumer reporting agencies' online procedures for removing a security freeze, 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 up to three (3) business days after receiving your request to remove the security freeze.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax	Experian	TransUnion
1-866-349-5191	1-888-397-3742	1-800-888-4213
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 740241	P.O. Box 9554	P.O. Box 1000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by requesting information in writing from the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. NW, Washington, DC 20580.

District of Columbia Residents: District of Columbia residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Office of the Attorney General for the District of Columbia at 441 4th Street, NW, Washington, DC 20001, 202-727-3400, oag@dc.gov, <https://oag.dc.gov/>.