



Bert Bender, Partner
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May 5, 2025

VIA ONLINE SUBMISSION

Attorney General Mike Hilgers
Office of the Attorney General
Consumer Protection Division
2115 State Capital
Lincoln, NE 68509
Email: ago.consumer@nebraska.gov

Re: Notice of Data Security Incident

Dear Attorney General Hilgers:

Constangy, Brooks, Smith & Prophete, LLP, represents CLAS Information Services in relation to a recent data security incident. We are writing to notify your office of an incident that may involve personal information relating to approximately 2 Nebraska residents. CLAS does not waive any rights or defenses regarding the applicability of Nebraska law or personal jurisdiction by providing this notification.

1. Nature of the Security Incident

On October 18, 2024, CLAS was alerted to potential unusual activity within its network. In response, CLAS immediately began investigating and enlisted the assistance of cybersecurity and other technical experts to assist in determining what happened and whether personal information was accessed without authorization. In January 2025, the investigation determined that certain documents with personal information may have been accessed by an unauthorized individual. CLAS immediately undertook a comprehensive review of the identified documents to identify the individuals whose information was in the documents. This process was completed on March 31, 2025, when CLAS first determined the incident involved personal information protected under Neb. Rev. Stat. § 87-803. CLAS then confirmed available address information on April 24, 2025, so it could effectuate notification promptly thereafter.

The potentially affected information varies for each individual but may have included individuals' names, Social Security number, driver's license number, health insurance number, individual tax identification number.

2. Number of Nebraska Residents Affected

On April 30, 2025, CLAS notified approximately 2 Nebraska residents within the potentially affected population, via USPS First-Class Mail. A sample copy of the notification letter sent to the impacted individuals is included with this correspondence.

3. Steps Taken Relating to the Incident

As soon as CLAS learned of the unusual network activity, we took steps to secure its systems and launched an investigation to learn more about what happened and what information could have been affected. CLAS implemented additional safeguards to help ensure the security of its systems and to reduce the risk of a similar incident occurring in the future.

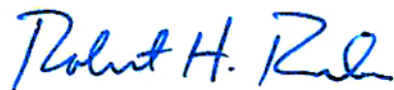
CLAS is providing those whose Social Security number was involved with identity protection services through TransUnion. The TransUnion identity protection services include Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services and fraud assistance at no charge for 12 months. In addition, CLAS has established a toll-free call center through TransUnion to answer questions about the incident and address related concerns.

Additionally, CLAS is providing impacted individuals with guidance on how to better protect against identity theft and fraud. CLAS is also providing individuals with information on how to place a fraud alert and security freeze on their credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

4. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me at Bbender@constangy.com or 445-308-1588.

Sincerely,



Bert Bender
Partner, Constangy Cyber Team

Attachment: Sample Notification Letter

[REDACTED]
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998

Via First-Class Mail



April 30, 2025

Subject: **Notice of Data Security Incident**

Dear [REDACTED],

We are writing to inform you of a data security incident that may have involved your information. CLAS Information Services is committed to maintaining the privacy and security of all information in our care. This letter has information about the incident, our response, and steps you can take to protect your information, including enrolling in the complimentary credit monitoring and identity protection services we are making available to you.

What happened? On October 18, 2024, CLAS learned of unusual activity in our network. In response, we immediately took measures to terminate the activity and secure our systems. In addition, we engaged cybersecurity specialists to investigate. Our investigation determined that CLAS data may have been accessed or downloaded without authorization. After a thorough review of the information, we determined that certain personal information was contained in the potentially affected data on January 28, 2025. CLAS then took steps to locate the information needed to complete notification to the individuals involved. This process was completed on March 31, 2025.

What Information Was Involved? The information potentially impacted in connection with this incident varies for each individual, but may have included information such as your name and Social Security number.

What We Are Doing: As soon as CLAS discovered the incident, we took the steps described above to investigate the identified activity. We also performed a thorough review of our systems to ensure that our systems remain secure. CLAS also implemented additional security measures to protect our digital environment.

In addition, to help protect your information, we are offering complimentary access to **Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score** services at no charge. These services provide you with alerts for twelve (12) months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout, a TransUnion company specializing in fraud assistance and remediation services.

What You Can Do: You can review the guidance included with this letter about how to protect your information. You can also contact our call center with any questions and to enroll in the free services, please log on to <https://bfs.cyberscout.com/activate> and follow the instructions provided. When prompted please provide the following unique code to receive services: [REDACTED]. In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity



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For More Information: If you have any questions about this letter, please contact our dedicated call center for this incident at 1-800-405-6108 toll-free Monday through Friday from 5 am - 5 pm Pacific time (excluding major U.S. holidays).

CLAS has implemented additional security measures to protect our digital environment and minimize the likelihood of future incidents. We appreciate your patience and understanding as we respond to this event.

Sincerely,

A handwritten signature in dark ink, appearing to read 'MAB', with a long horizontal flourish extending to the right.

Michael A. Barr, President &
CEO, CLAS Information
Services 1545 River Park Dr.,
Suite 330 Sacramento, CA
95815

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and 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 also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (the “FTC”).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting www.annualcreditreport.com, 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 also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at www.annualcreditreport.com.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov
877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
www.marylandattorneygeneral.gov/Pages/CPD
888-743-0023

Oregon Attorney General

1162 Court St., NE
Salem, OR 97301
www.doj.state.or.us/consumer-protection
877-877-9392

California Attorney General

1300 I Street
Sacramento, CA 95814
www.oag.ca.gov/privacy
800-952-5225

New York Attorney General

The Capitol
Albany, NY 12224
800-771-7755
ag.ny.gov

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
www.riag.ri.gov
401-274-4400



Iowa Attorney General
1305 E. Walnut Street
Des Moines, Iowa 50319
www.iowaattorneygeneral.gov
888-777-4590

NY Bureau of Internet and Technology
28 Liberty Street
New York, NY 10005
www.dos.ny.gov/consumerprotection/
212.416.8433

Washington D.C. Attorney General
400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov/consumer-protection
202-442-9828

Kentucky Attorney General
700 Capitol Avenue, Suite 118
Frankfort, Kentucky 40601
www.ag.ky.gov
502-696-5300

NC Attorney General
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov/protectingconsumers/
877-566-7226

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit:
www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.