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STATE OF VERMONT  
OFFICE OF THE ATTORNEY GENERAL  
109 STATE STREET  
MONTPELIER, VT  
05609-1001

March 26, 2018

Mr. Brian E. Hogue  
C/O ISCC  
P.O. Box 70010  
Boise, ID 83707

**Re: Public Records Request**

Dear Mr. Hogue:

I write in response to your public records act request dated February 26, 2018, received by our office on March 12, 2018, in which you requested:

1. Any and all documents related to the July 29<sup>th</sup>, 201[7], Equifax data security breach, including reports, letters and/or memoranda;
2. the letter dated September 7, 2017, from Phyllis Summer of King & Spalding to our office;
3. any investigative reports related to the breach; and
4. any complaints regarding Equifax filed by a Vermonter on or after July 1, 2016.

Please find documents, responsive to items 2 and 4 above, attached.

Please be advised that we have withheld records that are exempt from disclosure under exemption for trade secrets, 1 V.S.A. § 317(c)(9), personal privacy, § 317(c)(7), or are otherwise privileged, § 317(c)(4). The complaints are in the form of a spreadsheet. If you require the actual underlying complaint from each consumer, please let us know and we will provide you an estimate of the estimated expense of producing those documents.

To the extent you feel information has been withheld in error, you may appeal to the Deputy Attorney General, Joshua Diamond. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Curtis", with a long horizontal flourish extending to the right.

Christopher J. Curtis  
Chief, Public Protection Division

# KING & SPALDING

King & Spalding LLP  
1180 Peachtree Street N.E.  
Atlanta, GA 30309-3521  
Tel: +1 404 572 4600  
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Phyllis B. Sumner  
Direct Dial: +1 404 572 4799  
Direct Fax: +1 404 572 5100  
psummer@kslaw.com

September 7, 2017

To: Exhibit A; Distribution List

Re: Data Security Incident Affecting Equifax Inc.

Dear Sir or Madam,

I write on behalf of Equifax Inc. ("Equifax") regarding a cybersecurity incident potentially impacting information relating to approximately 143 million U.S. consumers. The approximate number of potentially impacted residents in your state is identified in Exhibit B. Equifax takes seriously its responsibility to protect the security of personal information, and our priority is to assist consumers who may have been impacted. The circumstances of the incident and the steps Equifax is taking to protect consumers are set forth below.

On July 29, 2017, Equifax discovered that criminals exploited a U.S. website application vulnerability to gain access to certain files. Upon discovery, Equifax acted immediately to stop the intrusion. The company promptly engaged a leading, independent cybersecurity firm that has been conducting a comprehensive forensic review to determine the scope of the intrusion, including the specific data impacted. Equifax also reported the criminal access to law enforcement and continues to work with authorities. While the company's investigation is substantially complete, it remains ongoing and is expected to be completed in the coming weeks.

The information accessed primarily includes names, Social Security numbers, birth dates, addresses and, in some instances, driver's license numbers. In addition, credit card numbers for approximately 209,000 U.S. consumers, and certain dispute documents with personal identifying information for approximately 182,000 U.S. consumers, were accessed. The company has found no evidence of unauthorized access on Equifax's core consumer or commercial credit reporting databases.

Equifax has established a dedicated website, [www.equifaxsecurity2017.com](http://www.equifaxsecurity2017.com), to notify consumers of the incident, help them understand if they were potentially impacted, and provide steps they can take to protect against the potential misuse of their information. In addition to the website, Equifax will send direct mail notices to consumers whose credit card numbers or dispute documents with personal identifying information were impacted.

September 7, 2017

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Equifax is also offering to all U.S. consumers complimentary credit file monitoring and identity theft protection for one year, even if a consumer is not impacted by this incident. The offering, called TrustedID Premier, includes 3-Bureau credit monitoring of Equifax, Experian and TransUnion credit reports; copies of Equifax credit reports; the ability to lock and unlock Equifax credit reports; identity theft insurance; and Internet scanning for Social Security numbers. Information on how to enroll for this offering is included on the dedicated website. Additionally, Equifax has established a dedicated call center, 866-447-7559, available from 7:00 a.m. to 1:00 a.m. Eastern time, seven days a week, to answer questions about the incident, assist consumers in signing up for the complimentary service, and provide information about how to further protect personal information.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Phyllis B. Sumner', with a long horizontal flourish extending to the right.

Phyllis B. Sumner

Enclosures

### Exhibit A - Distribution List

<p>Steve Marshall Office of the Alabama Attorney General Office of the Attorney General P.O. Box 300152 Montgomery, AL 36130-0152</p>	<p>Jahna Lindemuth Alaska Attorney General Office 1031 West 4th Avenue, Suite 200 Anchorage, AK 99501 attorney.general@alaska.gov</p>
<p>Mark Brnovich Office of the Arizona Attorney General 1275 West Washington Street Phoenix, AZ 85007-2926 AGInfo@azag.gov</p>	<p>Leslie Rutledge Arkansas Attorney General Office 323 Center Street, Suite 200 Little Rock, AR 72201 oag@ArkansasAG.gov</p>
<p>Xavier Becerra Office of the California Attorney General California Department of Justice P.O. Box 944255 Sacramento, CA 94244-2550</p>	<p>Cynthia H. Coffman Office of the Colorado Attorney General Colorado Department of Law Ralph L. Carr Judicial Building 1300 Broadway, 10th Floor Denver, CO 80203</p>
<p>George Jepsen State of Connecticut Attorney General's Office 55 Elm Street Hartford, CT 06106 ag.breach@ct.gov</p>	<p>Karl A. Racine District of Columbia Attorney General 441 4th Street, NW Washington, DC 20001 dc.oag@dc.gov</p>
<p>Matt Denn Delaware Attorney General Delaware Department of Justice Carvel State Building 820 N. French St. Wilmington, DE 19801 attorney.general@state.de.us</p>	<p>Pam Bondi Office of the Attorney General of Florida State of Florida The Capitol PL-01 Tallahassee, FL 32399-1050</p>
<p>Chris Carr Office of the Georgia Attorney General 40 Capitol Square, SW Atlanta, GA 30334</p>	<p>Douglas Chin Department of the Attorney General of Hawaii 425 Queen Street Honolulu, HI 96813</p>

<p>Hawaii Office of Consumer Protection  Leiopapa A Kamehameha Building aka State  Office Tower  235 South Beretania Street  Honolulu, Hawaii 96813  dcca@dcca.hawaii.gov</p>	<p>Lawrence Wasden  State of Idaho Attorney General's Office  700 W Jefferson St., Suite 210  P.O. Box 83720  Boise, ID 83720-0010</p>
<p>Lisa Madigan  Illinois Attorney General's Office  100 W. Randolph Street  Chicago, IL 60601  databreach@atg.state.il.us</p>	<p>Curtis T. Hill, Jr.  Indiana Attorney General's Office  Indiana Government Center South  302 W. Washington St., 5th Floor  Indianapolis, IN 46204  IDTheft@atg.in.gov</p>
<p>Tom Miller  Office of the Attorney General of Iowa  Hoover State Office Bldg.  1305 E. Walnut Street  Des Moines, IA 50319  consumer@iowa.gov</p>	<p>Derek Schmidt  Kansas Attorney General  120 S.W. 10th Ave., 2nd Floor  Topeka, KS 66612-1597</p>
<p>Andy Beshear  Office of the Kentucky Attorney General  700 Capitol Ave, Suite 118  Frankfort, KY 40601-3449</p>	<p>Jeff Landry  Office of the Louisiana Attorney General  P.O. Box 94005  Baton Rouge, LA 70804-4095  ConsumerInfo@ag.louisiana.gov</p>
<p>Janet T. Mills  Office of the Maine Attorney General  6 State House Station  Augusta, ME 04333  breach.security@maine.gov</p>	<p>Brian E. Frosh  Office of the Maryland Attorney General  200 St. Paul Place  Baltimore, MD 21202-2202  Idtheft@oag.state.md.us</p>
<p>Maura Healey  Office of the Attorney General of  Massachusetts  One Ashburton Place  Boston, MA 02108-1518  ago@state.ma.us</p>	<p>Bill Schuette  Michigan Department of Attorney General  525 W. Ottawa St.  P.O. Box 30212  Lansing, MI 48909  miag@michigan.gov</p>
<p>Lori Swanson  Office of the Minnesota Attorney General  445 Minnesota Street, Suite 1400  St. Paul, MN 55101-2131  Attorney.General@ag.state.mn.us</p>	<p>Jim Hood  Mississippi Attorney General's Office  550 High Street  Jackson, MS 39201</p>

<p>Josh Hawley Missouri Attorney General's Office Supreme Court Building 207 W. High St. P.O. Box 899 Jefferson City, MO 65102 attorney.general@ago.mo.gov</p>	<p>Tim Fox Office of the Montana Attorney General Justice Building, Third Floor 215 North Sanders P.O. Box 201401 Helena, MT 59620-1401 contactdoj@mt.gov</p>
<p>Montana Office of Consumer Protection P. O. Box 200151 Helena, MT 59620-0151 contactocp@mt.gov</p>	<p>Doug Peterson Nebraska Attorney General's Office 2115 State Capitol P.O. Box 98920 Lincoln, NE 68509 ago.consumer@nebraska.gov</p>
<p>Adam Paul Laxalt Office of the Nevada Attorney General 100 North Carson Street Carson City, NV 89701 AgInfo@ag.nv.gov</p>	<p>Gordon J. MacDonald New Hampshire Department of Justice 33 Capitol Street Concord, NH 03301 attorneygeneral@doj.nh.gov</p>
<p>Christopher S. Porrino Office of the New Jersey Attorney General RJ Hughes Justice Complex 25 Market Street, Box 080 Trenton, NJ 08625-0080 databreach@cyber.nj.gov</p>	<p>Hector Balderas Office of the New Mexico Attorney General 408 Galisteo Street Villagra Building Santa Fe, NM 87501</p>
<p>Eric T. Schneiderman Office of the New York Attorney General The Capitol Albany, NY 12224-0341</p>	<p>Josh Stein North Carolina Attorney General's Office 9001 Mail Service Center Raleigh, NC 27699-9001</p>
<p>Wayne Stenehjem North Dakota Attorney General's Office 600 E. Boulevard Ave. Dept. 125 Bismarck, ND 58505 ndag@nd.gov</p>	<p>Mike DeWine Ohio Attorney General's Office 30 E. Broad Street, 14th Floor Columbus, OH 43215</p>
<p>Mike Hunter Oklahoma Office of the Attorney General 313 NE 21st Street Oklahoma City, OK 73105</p>	<p>Ellen F. Rosenblum Office of the Oregon Attorney General Oregon Department of Justice 1162 Court Street, NE Salem, OR 97301-4096</p>

<p>Josh Shapiro  Pennsylvania Office of Attorney General  16th Floor, Strawberry Square  Harrisburg, PA 17120</p>	<p>Puerto Rico Departamento de Asuntos del Consumidor  Ave. José De Diego, Pda. 22  Centro Gubernamental Minillas  Edificio Torre Norte, Piso 7  San Juan, PR 00940  servicio@daco.pr.gov</p>
<p>Peter F. Kilmartin  Office of the Rhode Island Attorney General  150 South Main Street  Providence, RI 02903</p>	<p>Alan Wilson  Office of the South Carolina Attorney General  P.O. Box 11549  Columbia, SC 29211</p>
<p>Consumer Protection Division of the Department of Consumer Affairs  P.O. Box 5757  Columbia, SC 29250</p>	<p>Marty J. Jackley  South Dakota Attorney General's Office  1302 East Highway 14, Suite 1  Pierre, SD 57501-8501  consumerhelp@state.sd.us</p>
<p>Herbert H. Slatery, III  Office of the Tennessee Attorney General and Reporter  P.O. Box 20207  Nashville, TN 37202-0207</p>	<p>Ken Paxton  Office of the Texas Attorney General  P.O. Box 12548  Austin, TX 78711-2548</p>
<p>Sean D. Reyes  Utah Office of the Attorney General  Utah State Capitol Complex  350 N. State St., Suite 230  Salt Lake City, UT 84114-2320  uag@agutah.gov</p>	<p>TJ Donovan  Vermont Attorney General's Office  109 State Street  Montpelier, VT 05609-1001  ago.cap@vermont.gov</p>
<p>Mark R. Herring  Office of the Virginia Attorney General  202 North Ninth Street  Richmond, VA 23219</p>	<p>Bob Ferguson  Washington State Office of the Attorney General  1125 Washington St SE  P.O. Box 40100  Olympia, WA 98504-0100  SecurityBreach@atg.wa.gov</p>

<p>Patrick Morrissey Office of the West Virginia Attorney General State Capitol Complex Bldg. 1, Room E-26 Charleston, WV 25305 consumer@wvago.gov</p>	<p>Brad Schimel Office of the Wisconsin Attorney General Wisconsin Department of Justice P.O. Box 7857 Madison, WI 53707-7857</p>
<p>Peter K. Michael Wyoming Attorney General's Office Kendrick Building 2320 Capitol Avenue Cheyenne, WY 82002 ag.consumer@wyo.gov</p>	



**Exhibit B – Approximate Number of Potentially Impacted Residents**

Vermont – Approximately 242,888

# CAP - Business Adhoc Report

Matters between 07/01/2016 and 3/20/2018  
Report Created on 3/20/2018

Number of Matters: 6

matter number	date opened	matter type	practice code	trade code	subtrade code	status code	process code	claimed losses	consumer type
2017-03210	5/5/2017	Complaint	CREDIT - INACCURATE CREDIT REPORT	22 - Banking, Credit and Finance	22C - Credit Reporting Agency	PEN	REG		
2017-03604	5/23/2017	Complaint	CREDIT - INACCURATE CREDIT REPORT	22 - Banking, Credit and Finance	22C - Credit Reporting Agency	RES	REG	\$0.00	
2018-00046	1/2/2018	Complaint	FAILURE TO PERFORM CREDIT REPORT	22 - Banking, Credit and Finance	22C - Credit Reporting Agency	PEN	REG	\$0.00	
2018-00046	1/2/2018	Complaint	FAILURE TO PERFORM	22 - Banking, Credit and Finance	22C - Credit Reporting Agency	PEN	REG	\$0.00	
2018-00046	1/2/2018	Complaint	MISREPRESENTATION- VERBAL	22 - Banking, Credit and Finance	22C - Credit Reporting Agency	PEN	REG	\$0.00	
2018-00046	1/2/2018	Complaint	MISREPRESENTATION- VERBAL	22 - Banking, Credit and Finance	22C - Credit Reporting Agency	PEN	REG	\$0.00	