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October 29, 2021

(SUBMITTED VIA EMAIL ONLY TO ocpdatabreach@mt.gov)

Attorney General's Office
Office of Consumer Protection

Re: Security Breach Notification

Dear Attorney General Knudsen,

We are writing on behalf of our client, AGI Publishing, Inc. (d/b/a Valley Yellow Pages) ("AGI") (located at 1850 N Gateway Blvd, Fresno, CA 93727) to notify you of a data security incident involving nine (9) Montana residents.¹

Nature

On September 11, 2021, AGI discovered that they were the victim of a sophisticated ransomware attack that resulted in encryption and unauthorized access to their network. At that time, AGI took immediate steps to stop the threat and understand the full scope of the situation. This included hiring third-party forensic experts to conduct a thorough investigation, remediation efforts, and contacting the FBI to seek assistance with the incident. On October 19, 2021, AGI concluded its initial investigation and found that the unauthorized individual(s) gained access to its systems via a VPN access, which has been remedied and secured.

Concurrently, AGI began a comprehensive search of the data to determine what information was involved and the individuals the incident impacted. AGI recently concluded its review and determined that the incident involved personal information related to nine (9) Montana residents.

The personal information that was potentially impacted included social security numbers and the protected health information that was potentially impacted included first and last names, addresses, health/dental plan numbers, and premium amounts paid.

Notice and AGI's Response to the Event

On October 29, 2021, AGI will mail a written notification to the potentially affected Montana residents, pursuant to Mont. Code Ann. §§ 30-14-1701 - 02 & 1704, in a substantially similar form as the enclosed letter (attached as Exhibit A).

¹ By providing this notice, AGI does not waive any rights or defenses regarding the applicability of Montana law, the applicability of the Montana data event notification statute, or personal jurisdiction.

Additionally, AGI is providing the potentially impacted individuals the following:

- Free access to credit monitoring services for one year through Experian;
- Guidance on ways to protect against identity theft and fraud, including steps to report any suspected activities or events of identity theft or fraud to their credit card company and/or bank;
- The appropriate contact information for the consumer reporting agencies along with information on how to obtain a free credit report and place a fraud alert and security freeze on their credit file;
- 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 and law enforcement to report attempted or actual identity theft and fraud.

Further, AGI provided the notice to the three major credit reporting agencies along with the applicable government regulators, officials, and other Attorneys General (as necessary).

Finally, AGI is working to implement any necessary additional safeguards, enhance and improve its policies and procedures related to data protection, improve its cybersecurity infrastructure, and further train its employees on best practices to minimize the likelihood of this type of incident occurring again.

Contact Information

If you have any questions or wish to discuss this event further, please do not hesitate to call me on my direct dial (410) 832-8002 or email me at spollock@wtpaw.com.

Sincerely Yours,

A handwritten signature in blue ink, appearing to read "Spencer S. Pollock". The signature is fluid and cursive, with the first name "Spencer" being more prominent.

Spencer S. Pollock, Esq., CIPP/US, CIPM