



BUCHANAN
& EDWARDS

1700 N Moore Street, Suite 2110
Arlington, VA 22209

April 10, 2015

«First_Name» «Last_Name»
«Address»
«City», «State» «Zip»

Dear «First_Name» «Last_Name»,

We are writing to inform you about an incident involving your personal information. While investigating an incident in which an unauthorized third party unsuccessfully attempted to transfer funds from a Buchanan & Edwards, Inc. (“Buchanan”) bank account, we discovered on March 11, 2015, that an employee’s email account had been compromised on or about February 10, 2015. We promptly reset all user passwords and are enhancing our log in requirements and network security to prevent a similar incident from occurring in the future. In an abundance of caution, we also continued investigating the contents of that email account and, on March 31, 2015, we learned that the email account contained personal information about a limited number of individuals, including you. The types of information included names, social security numbers, and, in some instances, dates of birth or basic contact information (such as addresses, email addresses, or phone numbers).

While we have no evidence that your information has been misused in any way, we are writing to inform you of this unfortunate incident and to identify steps you may take to protect yourself.

To help safeguard you from potential misuse of your information, we have arranged for AllClear ID to provide you with one year of **free** credit protection services. The credit protection services automatically start on the date of this notice and can be used at any time during the next year. Additional information about these services is included with this notice, including a redemption code. We have also included a Reference Guide below that suggests other steps you may take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

Whether or not you choose to enroll in the free AllClear ID service, you should continue to check your credit reports periodically to ensure that fraudulent activity has not occurred. Even if there are no signs of fraud on these reports, we recommend that you remain vigilant, check these credit reports periodically, and report anything suspicious to law enforcement.

Keeping your personal information secure is of the utmost importance to us. We sincerely regret any inconvenience or concern this event may cause you and are taking steps to help prevent this type of incident from happening in the future. In the meantime, we urge you to take advantage of the services available to you.

If you have questions regarding this incident, please contact me at the information below.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Innella". The signature is written in a cursive style with a large initial "M".

Michael R. Innella
Chief Operating Officer
(703) 535-5511

AllClear ID Credit Monitoring Services Overview

We have arranged to have AllClear ID protect your identity for one year at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next year.

AllClear SECURE: The team at AllClear ID is ready and standing by if you need help protecting your identity. You are automatically eligible to use this service – there is no action required on your part. If a problem arises, simply call 1-866-979-2595, and a dedicated investigator will do the work to recover financial losses, restore your credit and make sure your identity is returned to its proper condition. AllClear maintains an A+ rating at the Better Business Bureau.

AllClear PRO: This service offers additional layers of protection including credit monitoring and a \$1,000,000 identity theft insurance policy. To use the PRO service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-866-979-2595 using the following redemption code: «Code».

Please note: Additional steps may be required by you in order to activate your phone alerts.

Information about Identity Theft Prevention

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax, P.O. Box 105139, Atlanta, Georgia 30374-0241, 1-800-685-1111, www.equifax.com

Experian, P.O. Box 2002, Allen, TX 75013, 1-888-397-3742, www.experian.com

TransUnion, P.O. Box 6790, Fullerton, CA 92834-6790, 1-800-916-8800, www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

We recommend you remain vigilant with respect to reviewing your account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to us and to the proper law enforcement authorities, including local law enforcement, your state's attorney general and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding identity theft.

Federal Trade Commission, Consumer Response Center

600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

For residents of North Carolina: You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

North Carolina Attorney General's Office, Consumer Protection Division

9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov

For residents of Maryland: You may also obtain information about preventing and avoiding identity theft from the Maryland Attorney General's Office:

Maryland Attorney General's Office

200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us

Fraud Alerts: There are also two types of fraud alerts that you can place on your credit report to put your creditors on notice that you may be a victim of fraud: an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by calling the toll-free fraud number of any of the three national credit reporting agencies listed below.

Equifax: 1-800-525-6285, www.equifax.com

Experian: 1-888-397-3742, www.experian.com

TransUnion: 1-800-680-7289, www.transunion.com

Credit Freezes: You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. *Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit*

reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax, P.O. Box 105788, Atlanta, GA 30348, www.equifax.com

Experian, P.O. Box 9554, Allen, TX 75013, www.experian.com

TransUnion, LLC, P.O. Box 2000, Chester, PA, 19022-2000, www.transunion.com

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

Terms of Use for AllClear Secure

If you become a victim of fraud using your personal information without authorization, AllClear ID will help recover your financial losses and restore your identity. Benefits include:

- Automatic 12 months of coverage;
- No cost to you – ever. AllClear Secure is paid for by Teays.

Services Provided

If you suspect identity theft, simply call AllClear ID to file a claim. AllClear ID will provide appropriate and necessary remediation services (“Services”) to help restore the compromised accounts and your identity to the state prior to the incident of fraud. Services are determined at the sole discretion of AllClear ID and are subject to the terms and conditions found on the AllClear ID website. AllClear Secure is not an insurance policy, and AllClear ID will not make payments or reimbursements to you for any financial loss, liabilities or expenses you incur.

Coverage Period

You are automatically protected for 12 months from the date the incident occurred, as communicated in the notification letter you received from Teays (the “Coverage Period”). Fraud Events that occurred prior to your Coverage Period are not covered by AllClear Secure services.

Eligibility Requirements

To be eligible for Services under AllClear Secure coverage, you must fully comply, without limitations, with your obligations under the terms herein, you must be a citizen eighteen (18) years of age or older, reside in the United States, and have a valid U.S. Social Security number. Minors under eighteen (18) years of age may be eligible, but must be sponsored by a parent or guardian. The Services cover only you and your personal financial and medical accounts that are directly associated with your valid U.S. Social Security number, including but not limited to credit card, bank, or other financial accounts and/or medical accounts.

How to File a Claim

If you become a victim of fraud covered by the AllClear Secure services, you must:

- Notify AllClear ID by calling 1.855.434.8075 to report the fraud prior to expiration of your Coverage Period;
- Provide proof of eligibility for AllClear Secure by providing the redemption code on the notification letter you received from the sponsor Company;
- Fully cooperate and be truthful with AllClear ID about the Event and agree to execute any documents AllClear ID may reasonably require;
- Fully cooperate with AllClear ID in any remediation process, including, but not limited to, providing AllClear ID with copies of all available investigation files or reports from any institution, including, but not limited to, credit institutions or law enforcement agencies, relating to the alleged theft.

Coverage under AllClear Secure Does Not Apply to the Following:

Any expense, damage or loss:

- Due to
 - Any transactions on your financial accounts made by authorized users, even if acting without your knowledge
 - Any act of theft, deceit, collusion, dishonesty or criminal act by you or any person acting in concert with you, or by any of your authorized representatives, whether acting alone or in collusion with you or others (collectively, your “Misrepresentation”)
- Incurred by you from an Event that did not occur during your coverage period;
- In connection with an Event that you fail to report to AllClear ID prior to the expiration of your AllClear Secure coverage period.

Other Exclusions:

- AllClear ID will not pay or be obligated for any costs or expenses other than as described herein, including without limitation fees of any service providers not retained by AllClear ID; AllClear ID reserves the right to investigate any asserted claim to determine its validity;
- AllClear ID is not an insurance company, and AllClear Secure is not an insurance policy; AllClear ID will not make payments or reimbursements to you for any loss or liability you may incur;
- AllClear ID is not a credit repair organization, is not a credit counseling service, and does not promise to help you improve your credit history or rating beyond resolving incidents of fraud; and
- You are expected to protect your personal information in a reasonable way at all times. Accordingly, you will not recklessly disclose or publish your Social Security number or any other personal information to those who would reasonably be expected to improperly use or disclose that Personal Information, such as, by way of example, in response to “phishing” scams, unsolicited emails, or pop-up messages seeking disclosure of personal information.

Opt-out Policy

If for any reason you wish to have your information removed from the eligibility database for AllClear Secure, please contact AllClear ID:

<p><u>E-mail</u> support@allclearid.com</p>	<p><u>Mail</u> AllClear ID, Inc. 823 Congress Avenue Suite 300 Austin, Texas 78701</p>	<p><u>Phone</u> 1.855.434.8077</p>
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