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July 11, 2025

VIA MAIL

John M. Formella
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301

Dear Attorney General Formella:

We represent Azimuth Capital Management ("ACM") with respect to a data security incident involving personal information described below. ACM takes the security of the information in its control seriously and is committed to answering any questions you may have about the data security incident, its response, and steps taken to prevent a similar incident from occurring in the future.

1. Nature of security incident.

On March 31, 2025, ACM was alerted to unusual activity involving its information technology environment. In response, ACM initiated an investigation and took steps to secure its systems. Additionally, a third-party forensic firm was engaged to assist in the investigation. On June 17, 2025, ACM's investigation determined that an unauthorized party may have accessed files that containing personal information including name and some combination of the following: address, financial account name and number, Social Security number, date of birth, and other personal financial information.

2. Number of residents affected.

One (1) New Hampshire resident was notified of the incident. A notification letter was sent to the potentially affected individual on July 11, 2025. A copy of the form notification letter is enclosed as Exhibit A.

3. Steps taken in response to the incident.

Since the incident, ACM has taken steps to prevent a similar incident in the future. ACM implemented and will continue to adopt additional safeguards and technical security measures to further protect its systems. Additionally, letters were mailed to potentially affected individuals, which included instructions for enrolling in 12 months of credit monitoring and identity protection services through Experian at no cost.

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4. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me at skoller@clarkhill.com or (310) 928-7524.

Sincerely,

CLARK HILL PLC

A handwritten signature in black ink that reads "M. Scott Koller". The signature is written in a cursive, flowing style.

Scott Koller
Member

cc: Mariah Leffingwell – mleffingwell@clarkhill.com



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Dear <<Full Name>>,

<<Variable Data 2>>

We are writing to inform you about a recent data security incident that may have impacted some of your personal information stored on Azimuth Capital Management ("ACM") systems. We take the privacy and security of your information very seriously, and therefore we sincerely apologize for any concern or inconvenience this may cause you. This letter contains information about steps you can take to protect your information, and resources we are making available to help you.

What Happened?

On March 31, 2025, we were alerted to unusual activity involving our information technology environment. In response, we initiated an investigation and took steps to secure our systems. Additionally, a third-party forensic firm was engaged to assist in the investigation. This review concluded on June 17, 2025.

What Information Was Involved?

While in our IT environment, the unauthorized party may have accessed files that contain some of your information, including your name in combination with some or all of the following: financial account name and number, address, date of birth, Social Security number, and other personal financial information.

What We Are Doing:

To help prevent something like this from happening again, we have implemented, and will continue to adopt, additional safeguards and technical security measures to further protect and monitor our systems. In addition, while we are not aware of any misuse of your information, we have arranged for you to receive <<CM Duration>> months of credit monitoring and identity protection services through Experian at no cost to you.

What You Can Do:

Again, at this time, there is no evidence that your information has been misused. However, as is good practice, we encourage you to remain vigilant against incidents of identity theft over the next 12 to 24 months by reviewing your account statements and credit reports for any authorized activity.

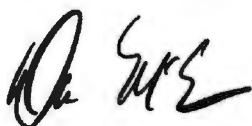
We also encourage you to take full advantage of the service offering, the details of which are provided on the following page. The representatives of the service offering can answer questions or concerns you may have regarding protection of your information. Lastly, the subsequent pages in this letter describe recommended additional steps you can take to help protect your information.

For More Information: If you have questions regarding the incident, please call (248) 433-4000.

We sincerely apologize for any unease or inconvenience this incident may cause you. We have always strived to protect your information, and so we are very disappointed about these developments.

Thank you for your attention to this matter and please contact us should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "De SWE", is positioned above the printed name and title.

Chief Compliance Officer
Azimuth Capital Management

Activate IdentityWorks In Three Easy Steps

To help protect your identity, we are offering a complimentary <<CM Duration>>-month membership to Experian IdentityWorksSM. This product helps detect possible misuse of your personal information and provides you with identity protection support focused on immediate identification and resolution of identity theft.

1. ENROLL by: <<Enrollment Deadline>>
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: <<Activation Code>>

The following are some additional details regarding your <<CM Duration>>-Month Experian IdentityWorks membership:

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related 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.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (877) 288-8057 by <<Enrollment Deadline>>. Be prepared to provide engagement number <<Engagement Number>>, as proof of eligibility for the Identity Restoration services by Experian.

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

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Recommended Additional Steps You Can Take to Protect Your Information

1. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

2. Place Fraud Alerts with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three bureaus is as follows:

Credit Bureaus

Equifax Fraud Reporting
1-866-349-5191
P.O. Box 105069
Atlanta, GA 30348-5069
www.equifax.com

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

TransUnion Fraud Reporting
1-800-680-7289
P.O. Box 2000
Chester, PA 19022-2000
www.transunion.com

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well.

You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

Please Note: No one is allowed to place a fraud alert on your credit report except you.

3. Credit or Security Freeze. By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 160, Woodlyn, PA 19094, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

4. You can obtain additional information about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov

Additional information for residents of the following states:

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

New Mexico Residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from a violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. You can review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

New York Residents: the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392.

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400. There were <<RI Count>> Rhode Island residents impacted by this incident.

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.