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October 13, 2022

VIA ONLINE SUBMISSION

Attorney General Aaron Frey
Maine Attorney General's Office
Consumer Protection Division
6 State House Station
Augusta, ME 04333

Re: Notification of Data Security Incident

Dear Attorney General Frey:

Lewis Brisbois represents Alternative Investment Resource, LLC d/b/a AIR Asset Management ("AIR") in connection with a recent data security incident described in greater detail below. AIR is an SEC Registered Investment Advisor located in Chicago, IL focusing exclusively on alternative investments. The purpose of this letter is to notify you, in accordance with Me. Rev. Stat. Tit. 10 § 1348, that this incident may have affected the personal information of one (1) Maine resident.

1. Nature of the Security Incident

On March 28, 2022, AIR discovered unusual activity involving an employee's email account. Upon discovering this activity, AIR took immediate steps to secure its email environment and engaged cybersecurity experts to assist with an investigation. The investigation determined that two employee email accounts were accessed without authorization between January 22, 2022 and March 28, 2022.

As a result, AIR undertook a comprehensive review of the contents of the email accounts to identify whether any individual information was contained in the accounts. The review concluded on August 23, 2022, at which time AIR learned that the email accounts may have contained personal information. Since that time, AIR has been working diligently to identify current contact information needed to notify all individuals potentially affected by this incident. On October 5, 2022, AIR identified one (1) Maine resident within the potentially affected population.

2. Type of Information and Number of Maine Residents Affected

AIR notified one (1) resident of Maine of this data security incident via first class U.S. mail on October 13, 2022. The type of information involved varied by individual but may have included the Maine resident's name, address, date of birth, Social Security number, driver's license number, passport number, alien registration number, other government-issued ID number, medical information, digital signature, and financial account number with password or routing number. A sample copy of the notification letter sent to the affected individuals is included with this correspondence.

3. Steps Taken Relating to the Incident

As soon as AIR discovered this incident, it took steps to secure its systems and launched an investigation to determine what happened and whether personal information had been accessed or acquired without authorization. AIR has also implemented additional security features to help ensure the security of its systems and to reduce the risk of a similar incident occurring in the future.

AIR has established a toll-free call center through IDX to answer questions about the incident and address related concerns. In addition, AIR is offering twelve months of complimentary credit and identity monitoring services to all potentially affected individuals.

4. Contact Information

AIR remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact me at (214) 722-7141 or by e-mail at Lindsay.Nickle@lewisbrisbois.com. Please let me know if you have any questions.

Sincerely,



Lindsay B. Nickle
LEWIS BRISBOIS BISGAARD & SMITH LLP

LBN

Attachment: Consumer Notification Letter Template



10300 SW Greenburg Rd.
Suite 570
Portland, OR 97223

To Enroll, Please Call:
1-833-903-3648
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: [XXXXXXXXXX]

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

October 13, 2022

Subject: Notice of Data <<Variable 1>>

Dear <<First Name>> << Last Name>>:

I am writing to inform you of a data security incident that may have affected your personal information. At Alternative Investment Resource, LLC d/b/a AIR Asset Management (“AIR”), we take the privacy and security of your information very seriously. Therefore, we are contacting you to notify you about this incident and provide you with information about steps you can take to protect your information, including enrolling in the complimentary identity protection services we are making available to you.

What Happened? On March 28, 2022, AIR discovered unusual activity involving an employee’s email account. Upon discovering this activity, we immediately initiated an investigation and took steps to secure our email environment. The investigation concluded that two employee email accounts were accessed without authorization between January 22, 2022 and March 28, 2022. As a result, AIR undertook a comprehensive review of the contents of the email accounts to identify whether any individual information was contained in the accounts. Our review concluded on August 23, 2022, at which time we learned that the email accounts may have contained some of your personal information. As soon as we discovered that the incident impacted individuals’ personal information, we immediately conducted a diligent search to identify current mailing addresses so that we could send notifications.

Please note this incident was limited to select information transmitted by email. We are not aware of the misuse of any personal information that may have been involved in this incident.

What Information Was Involved? The affected information may have included your <<Variable 2: Data Elements>>.

What Are We Doing? As soon as we discovered this incident, we took the steps described above. We have also implemented additional safeguards to help ensure our email environment’s security and reduce the risk of a similar incident occurring in the future.

In addition, we are providing steps you can take to help protect your personal information, and out on an abundance of caution, we offer you <<Variable 3: 12/24 months>> identity protection and credit monitoring services at no cost to you through IDX. The IDX services include credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised. Please note that the deadline to enroll in these services is January 10, 2023.

What Can You Do? We recommend you review the guidance included in this letter about protecting your information. You can also contact our dedicated call center with any questions and enroll in the free services by calling 1-833-903-

3648 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. Call center representatives are available to assist you Monday through Friday from 8:00 a.m. to 8:00 p.m. Central Time.

For More Information: Further information about how to help protect your information appears on the following page. If you have questions or need assistance, please call 1-833-903-3648, Monday through Friday from 8:00 a.m. to 8:00 p.m. Central Time.

We take your trust in us and this matter very seriously. Please accept our sincere apologies for any worry or inconvenience this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Boyet Besse', with a stylized flourish at the end.

Amy Boyet Besse
Chief Compliance Officer

AIR Asset Management
333 South Wabash, 2714
Chicago, IL 60604

Steps You Can Take to Protect Your Personal 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 (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 <http://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 105788
Atlanta, GA 30348
1-888-378-4329
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-800-831-5614
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 <http://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
1-877-438-4338

Maryland Attorney General

St. Paul Plaza
200 St. Paul Place
Baltimore, MD 21202
marylandattorneygeneral.gov
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
ag.ny.gov
1-212-416-8433 / 1-800-771-7755

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Washington D.C. Attorney General

400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

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 https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

