



PIERSON FERDINAND

MICHAEL E. KAR  
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Direct:

November 13, 2024

VIA E-MAIL (DOJ-CPB@doj.nh.gov)

Office of the New Hampshire Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301

**Re: Third-Party Data Incident  
Financial Business and Consumer Solutions, Inc. – February 26, 2024**

To Whom It May Concern:

Pierson Ferdinand LLP represents First Financial Portfolio Venture Capital, LLC and First Financial Investment Fund Holdings, LLC (“FFP”), located at 3091 Governors Lake Drive, Suite 500, Peachtree Corners, Georgia 30071, and its related entities, including: First Financial Investment Fund III, LLC, First Financial Investment Fund V, LLC, First Financial Investment Fund VI, LLC, First Portfolio Ventures I, LLC and First Portfolio Ventures II, LLC.

This correspondence is related to the data breach notification previously made to your office by Financial Business and Consumer Solutions, Inc. (“FBCS”) arising out of a February 26, 2024 incident (the “FBCS Incident”). See attached *Enclosure A* notification made by FBCS, which includes notice on behalf of FFP. FFP is a third-party impacted by the FBCS Incident.

We understand that FBCS mailed incident notification letters to certain impacted data subjects before completing data mining. FBCS subsequently advised that additional impacted individuals were identified, informed FFP that FBCS would not mail any further data subject notification letters, and declared bankruptcy. FFP is now providing notification to additionally impacted individuals identified by FBCS. We note that FBCS provided public data breach notice via webpage and notice to media outlets.

FBCS has not reported instances of data misuse or fraud.

FFP contacted impacted third-party entities regarding the additional impacted data subjects. On October 17, 2024, FFP mailed breach notification letters to the data subjects identified by FBCS that were not otherwise sent notifications. This notification was based on the notification previously made by FBCS, and a template is enclosed as *Enclosure B*. Letters were mailed to 160



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residents of your state. FFP is also providing complimentary credit monitoring, identity theft protection, and call center services.

FFP values the protection and proper use of personal information and will continue to mitigate harm while hardening its third-party cyber risk. If you have any questions or need additional information, please do not hesitate to contact me at

Sincerely,

Michael E. Kar  
Partner  
Pierson Ferdinand LLP

Enclosures (2)