

STATE OF NEW YORK
DEPARTMENT OF STATE

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ANDREW M. CUOMO
GOVERNOR

ROSSANA ROSADO
SECRETARY OF STATE

December 27, 2017

Mr. Paulino do Rego Barros Jr.
Interim Chief Executive Officer
Equifax, Inc.
1550 Peachtree Street, N.W.
Atlanta, Georgia 30309

Dear Mr. Barros:

Pursuant to the authority and powers vested in the Department of State by Executive Law §94-a(3)(a), General Business Law §899-aa(8)(a), General Business Law §380-t(g) and 19 NYCRR Part 226, adopted on December 21, 2017 as an emergency measure, the Department hereby demands Equifax provide the following:

1. A direct consumer liaison contact at Equifax to assist with individual consumer concerns.
2. The name(s) of any federal law enforcement agency or agencies engaged in responding to the 2017 Equifax Data Breach, including specific contact(s) in any civil or criminal investigation.
3. New York specific data for the consumers, whose credit card information and/or dispute documents with personal identity information was exposed, including a copy of any written notice(s) provided to them, and the date(s) said written notice(s) were sent.
4. The number of children under the age of 16 affected by the breach both nationally and within New York, and: a copy of the notice provided to their parents; identification of the data points and/or validating documents that were exposed, and the long-term protection response created for these uniquely affected consumers, if any.
5. A detailed description of Equifax's core consumers or commercial credit reporting databases and how they differ from the databases that were exposed in the July 29, 2017 breach.
6. A summary of Equifax's plan to make the 8.4 million affected New Yorkers whole in the wake of the breach, if such plan exists.
7. A description of the protocol for the assignment of PIN numbers to consumers for placement of a post-breach security freeze and the security measures in place to discourage unauthorized use of such PIN numbers.
8. A listing and explanation of the full scope of limitations imposed upon subscribers to TrustID, including any limitations of liability and any prohibitions against civil recourse for breach or damages.
9. All New York State specific data available concerning the response times for the placement, lift and removal of a security freeze since September 7, 2017.
10. An explanation of the consequences of the breach upon consumers who placed a security freeze or fraud alert on their credit report (or their child's credit report) with Equifax before the discovery of the breach
11. A copy of the Mandiant "comprehensive forensic review" prepared for Equifax and completed on October 2, 2017, as announced by Equifax in its October 12, 2017 breach notification.



**Department
of State**

This information will assist the Department of State's Division of Consumer Protection in its ongoing efforts to investigate, mediate and/or mitigate identity theft complaints from consumers generally, and more specifically relating to the July 29, 2017, security breach of Equifax's data, which exposed the personal information of millions of New Yorkers to criminal enterprise.

Please be advised that your response to this demand is required within ten business days from date of service.

Sincerely,

A handwritten signature in black ink, appearing to read "Rossana Rosado". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Rossana Rosado
Secretary of State