**Sample Demand Letter**

**«add»**

**«date»**

**Equifax, Inc.**

**1550 Peachtree Street N.E.**

**Atlanta, Georgia**

**Dear Equifax:**

**I am writing to you under the provisions of Massachusetts General Laws, Chapter 93A, Section 9, the Consumer Protection Act. I am writing to request relief as outlined in that statute.**

**On or about (date), the following unfair or deceptive act(s) or practice(s) occurred**: From at least March 7, 2017 through July 30, 2017, Equifax exposed my personally-identifiable information including but not limited to my full name, social security number, date of birth, address(es), credit card numbers, and driver’s license number.

As a result this personally-identifiable information was stolen or potentially stolen and used or will be used fraudulently. Equifax knew or should have known of the exposure of this information and failed to avail itself of the remedies, such as encryption or multiple layers of security, that were sufficient to protect consumers’ personal data and Equifax could have—and should have—prevented the Data Breach had it implemented and maintained reasonable safeguards, consistent with representations made to the public in its privacy policies, industry standards, and the requirements of Massachusetts law. Equifax did not do so. This has and/or will probably cause damages in the future, such as identity theft, tax return scams, financial fraud, health identity fraud, and other harm. Affected consumers have spent, and will continue to spend, money, time, and other resources attempting to protect against an increased risk of identity theft or fraud, including by placing security freezes over their credit files and monitoring their credit reports, financial accounts, health records, government benefit accounts, and any other account tied to or accessible with a social security number. I incorporate by reference the claims made by Maura Healey, Attorney General for the Commonwealth of Massachusetts v. Equifax inc.

**I believe that the(se) acts or practices are declared unlawful by Section 2 of Chapter 93A, which declares unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce unlawful. *If you are aware of the violation of a specific law or regulation, you will wish to quote the text of that law or regulation here, by saying that you believe the conduct is a violation of* [regulation or law number], *which provides: then quote the text you believe applies. (G.L. c. 93A & G.L. c. 93H)***

**I have suffered injury or loss of money or property (in the amount of), (or, as follows:) *Describe why you have been injured in this amount; if you have given the business an opportunity to fix poor repairs, for example, and they have not done so, put that information here.***

**This letter serves as my request for the following relief: «money». Under the provisions of Section 9 Chapter 93A, I am providing you with the opportunity to make a written offer of settlement of this claim within 30 days. If you fail to make a good faith offer of settlement in response to this request, and I institute legal action, a court may award me double or triple damages, attorney’s fees and costs if the court finds in my favor.**

**I may be reached at the address written above, or at «phone» between the hours of: «contact». I look forward to hearing from you.**

**Sincerely,**

**(Signature): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Print Name: «name»**