

STATE OF OREGON  
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES  
DIVISION OF FINANCE AND CORPORATE SECURITIES

Case No. ID-15-0137

In the Matter of:

Lattice Semiconductor Corporation,  
Respondent.

FINAL ORDER TO CEASE AND  
DESIST AND FINAL ORDER  
ASSESSING CIVIL PENALTY  
ENTERED BY CONSENT

WHEREAS the Director of the Department of Consumer and Business Services for the State of Oregon (the “*Director*”) has conducted an investigation of certain activities conducted by Lattice Semiconductor Corporation ( “*Respondent*”) and the Director has determined that Respondent violated provisions of the Oregon Consumer Identity Theft Protection Act, ORS 646A.600 to 646A.628 (the “*Act*”); and

WHEREAS Respondent wishes to resolve and settle this matter with the Director;

NOW THEREFORE, as evidenced by the authorized signatures subscribed on this Consent Order, Respondent hereby CONSENTS to entry of this Order to Cease and Desist and other sanctions upon the Director’s Findings of Fact and Conclusions of Law as stated hereinafter.

**FINDINGS OF FACT**

The Director FINDS that:

1. Respondent is a Delaware corporation with a principal place of business located in Portland, Oregon.
2. As part of its hiring practices, Respondent collects and retains a U.S. Department of Homeland Security Employment Eligibility Verification Form I-9 (“*Form I-9*”) for each employee of Respondent. A completed Form I-9 includes information that is personal and confidential in nature, including an employee’s name,

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Labor and Industries Building  
350 Winter Street NE, Suite 410  
Salem, OR 97301-3881  
Telephone: (503) 378-4387



1 birth date, Social Security number, driver’s license number or state identification number,  
2 and email address.

3 3. In March 2015, Respondent relocated its company headquarters from  
4 Hillsboro, Oregon to Portland, Oregon. In the process of that relocation, Respondent  
5 inadvertently discarded the contents of a file cabinet full of Form I-9 records for then  
6 current and former employees in an unsecure manner, by delivering the records to a  
7 public waste landfill in or around Portland, Oregon.

8 4. Respondent did not discover the inadvertent unsecure disposal until August  
9 2015, when it first needed to access a Form I-9 following the office relocation.

10 5. Respondent determined that Form I-9 records for approximately 145 Oregon  
11 residents were improperly discarded in an unsecure manner, and thereby subject to public  
12 display and/or access.

13 6. In September 2015, Respondent sent data security breach notification letters  
14 to approximately 145 Oregon residents whose personal information may have been  
15 publicly displayed and/or accessed at the landfill.

### 16 CONCLUSIONS OF LAW

17 The Director CONCLUDES that:

18 7. The Form I-9s collected and maintained by Respondent contained “personal  
19 information” as defined by ORS 646A.602(11), including employees’ names, birth dates,  
20 Social Security numbers, and driver’s license numbers or state identification numbers.

21 8. Respondent violated ORS 646A.620(1)(c) by publicly posting or displaying,  
22 or otherwise making available to the public, the Form I-9s, which contained the names  
23 and unredacted Social Security numbers of approximately 145 Oregon residents.

24 9. Pursuant to ORS 646A.624(4)(a), a person who violates or who procures, aids  
25 or abets in the violation of the Act may be subject to a civil penalty of not more than  
26 \$1,000 for every violation.





**ORDERS**

Based on the foregoing, the Director issues the following ORDERS:

*Final Order to Cease and Desist*

10. In accordance with ORS 646A.624(3), the Director hereby ORDERS Respondent to CEASE AND DESIST from violating the requirements of the Act.

*Final Order Assessing Civil Penalty*

11. As authorized by ORS 646A.624(4)(a), the Director may assess CIVIL PENALTIES in an amount not to exceed \$1,000 per violation against persons who violate the Act. Every violation is a separate offense and, in the case of a continuing violation, each day's continuance is a separate violation, but the maximum penalty for any occurrence shall not exceed \$500,000. ORS 646A.624(4)(b).

12. In accordance with ORS 646A.624(4), the Director ORDERS Respondent to pay a CIVIL PENALTY of \$5,000 (five thousand dollars) for violating ORS 646A.620(1)(c).

*Suspension of Civil Penalty*

13. Collection of \$2,500 (two thousand five hundred dollars) of the assessed CIVIL PENALTY is SUSPENDED by the Director so long as Respondent is in full compliance with the terms and conditions of this Consent Order. If Respondent commits no violations of the Act or this Consent Order during the five (5) year period from the date of issuance of this Order, the Director hereby agrees to WAIVE the suspended portion of the CIVIL PENALTY. The suspended portion of the penalty will be immediately due and payable upon a determination by the Director that Respondent has violated any term of this Consent Order or any provision of the Act.

14. Payment by Respondent of the assessed CIVIL PENALTY in the amount of \$2,500 (two thousand five hundred dollars) is immediately due at Respondent's signing of this Consent Order.



1 CONSENT TO ENTRY OF ORDER BY LATTICE SEMICONDUCTOR CORPORATION

2 I, Joe Bedewi, state that I am an officer or director of Lattice Semiconductor  
3 Corporation ( "**Respondent**" ) and that I am authorized to act on its behalf; I further state  
4 that I have read this Consent Order and that I know and fully understand the contents  
5 hereof; that the factual allegations stated herein are true and correct; that Respondent has  
6 been represented by counsel in this matter; that Respondent has been advised of the right  
7 to a hearing; that Respondent voluntarily and without any force or duress consents to the  
8 entry of this Consent Order, expressly waiving any right to a hearing in this matter; and  
9 that Respondent will fully comply with the terms and conditions of this Consent Order.

10 Respondent understands that this Consent Order is a public document.

11 LATTICE SEMICONDUCTOR CORPORATION

12  
13 By: /s/ Joe Bedewi  
Signature  
14 Joe Bedewi  
Printed Name  
15 CFO  
Position or Title

16  
17 State of Oregon

18 County of Multnomah

19  
20 Signed or attested before me on this 16<sup>th</sup> day of December, 2015 by Joe Bedewi.

21  
22 /s/ Sharon K. Saunders  
Notary Public – State of Oregon  
23 Commission No. 464351  
Expires December 19, 2015

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