



MULLEN
COUGHLIN^{LLC}
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426 W. Lancaster Avenue, Suite 200
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March 25, 2022

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

Dear Sir or Madam:

We represent Medsurant Holdings, LLC (“Medsurant”) located at 100 Front Street, Suite 280, West Conshohocken, PA 19428, and are writing to notify your office of an incident that may affect the security of some personal information relating to one hundred twenty-three (123) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Medsurant does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On September 30, 2021, Medsurant received a suspicious email from an unknown actor who alleged that they removed data from the Medsurant environment. Because the unknown actor alleged data removal from systems containing patient information, Medsurant worked quickly to investigate what happened and whether this incident resulted in any unauthorized access to, or theft of, patient information by the unknown actor.

Medsurant conducted an extensive investigation to determine the nature and scope of the incident. The investigation determined that certain systems were accessed by an unknown actor between September 23, 2021 and September 30, 2021, and some data was exfiltrated from those systems. Another brief, limited, period of access occurred on November 12, 2021, and some limited data was encrypted during this period but restored from internal sources. Medsurant performed a review of the compromised data to identify the individuals whose information was impacted. Medsurant then

worked to confirm the identities and contact information for affected individuals to provide notifications. On or around February 2, 2022, the review was completed. In the interim, on or around November 29, 2021, Medsurant notified the United States Department of Health and Human Services, posted notice on its website, and issued notice to the media in certain states where it does business.

The information that could have been subject to unauthorized access includes name, address, medical information, health insurance information, and Social Security number.

Notice to Maryland Residents

On or about March 25, 2022, Medsurant provided written notice of this incident to affected individuals, which includes one hundred twenty-three (123) Maryland residents who are receiving notice of data protected under Maryland law. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Medsurant moved quickly to investigate and respond to the incident, assess the security of Medsurant's systems, and notify potentially affected individuals. Medsurant is also working to implement additional safeguards and training to its employees. Medsurant is providing access to credit monitoring services for 24 months through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Medsurant is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their health care provider or financial institution. Medsurant is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Office of the Attorney General

March 25, 2022

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Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4776.

Very truly yours,

Edward J. Finn of
MULLEN COUGHLIN LLC

EJF/dtg
Enclosure

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

<<Header>>

Dear <<Name 1>>:

Medsurant Holdings, LLC (“Medsurant”) writes to inform you of a recent incident that may affect the security of some of your information. Medsurant is the parent company of Advanced Medical Resources, LLC, American Intraoperative Monitoring, LLC, Bromedicon, LLC, Evokes, LLC, Medsurant, LLC, Physiologic Assessment Services, LLC, Sensory Testing Systems, LLC, and Head & Spine Institute of Texas, LLC. While we have no evidence of fraudulent misuse of any information as a result of this incident, this notice provides information about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

What Happened? On September 30, 2021, Medsurant received a suspicious email from an unknown actor who alleged that they removed data from the Medsurant environment. Because the unknown actor alleged data removal from systems containing patient information, Medsurant worked quickly to investigate what happened and whether this incident resulted in any unauthorized access to, or theft of, patient information by the unknown actor.

Medsurant conducted an extensive investigation to determine the nature and scope of the incident. The investigation determined that our systems were accessed by an unknown actor between September 23, 2021 and September 30, 2021, and some data was exfiltrated from our systems. Another brief, limited, period of access occurred on November 12, 2021, and some limited data was encrypted during this period but restored from internal sources. Medsurant performed a review of the compromised data to identify the individuals whose information was impacted. Medsurant then worked to confirm the identities and contact information for affected individuals to provide notifications. On or around February 2, 2022, the review was completed.

What Information was Affected. The following types of your information were determined to have been taken by the threat actor during this incident: full name, address, <<Breached Elements>>.

What We are Doing. Medsurant takes this incident and the security of your information seriously. Upon learning of this incident, we immediately took steps to restore our operations and further secure our systems by implementing additional network monitoring and beginning a forensic review. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our existing policies and procedures and implementing additional administrative and technical safeguards to further secure the information in our systems. Medsurant also notified federal law enforcement, the U.S. Department of Health and Human Services, and other government regulators. While we are unaware of any fraudulent misuse of your information as a result of this incident, we are offering you access to 24 months of complimentary credit monitoring and identity restoration services through Equifax.

What You Can Do. As a precautionary measure, individuals are encouraged to remain vigilant against incidents of identity theft by reviewing account statements, credit reports, and explanations of benefits for unusual activity and to detect errors. We also encourage individuals to report any suspicious activity promptly to your insurance company, health care provider, or financial institution. Additional detail can be found below in the *Steps You Can Take to Help Protect Your Information*. You may also enroll in the complimentary credit monitoring services described above. Enrollment instructions are enclosed with this letter.

For More Information. If you have additional questions, you may call our dedicated assistance line toll-free at 855-964-4395, Monday through Friday, during the hours of 9:00 a.m. to 9:00 p.m., Eastern Standard Time (excluding U.S. holidays). You may also write to Medsurant at 100 Front Street, Suite 280, West Conshohocken, PA 19428.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

Medsurant Holdings, LLC



<<Name 1>>

Enter your Activation Code: <<ACTIVATION CODE>>

Enrollment Deadline: <<ENROLLMENT DEADLINE>>

Steps You Can Take To Help Protect Your Information

Enroll in Credit Monitoring

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product.

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourage potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate.

Enter your unique Activation Code of <<ACTIVATION CODE>> then click “Submit” and follow these 4 steps:

1. **Register:**
Complete the form with your contact information and click “Continue”.
If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.
2. **Create Account:**
Enter your email address, create a password, and accept the terms of use.
3. **Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click ‘Sign Me Up’ to finish enrolling.
You’re done!
The confirmation page shows your completed enrollment.
Click “View My Product” to access the product features.

¹ WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers’ personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers’ personal information is at risk of being traded.

² The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

³ Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer’s identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com.

⁴ The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, military identification, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th St. NW Washington, D.C. 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information

in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are <<RI Count>> Rhode Island residents impacted by this incident.