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March 18, 2022

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VIA E-MAIL (IDTHEFT@OAG.STATE.MD.US)

Office of the Attorney General
Attn: Jeff Karberg, Administrator of the Identity Theft Program
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Notification of a Data Security Incident

Dear Mr. Karberg:

We represent Ward Arcuri Foley & Dwyer Law Firm (“Ward Arcuri”), which has an address at 44 Oxford Road, New Hartford New York, in connection with an incident that involved the personal information of six (6) Maryland residents. Ward Arcuri is reporting the incident pursuant to MD. CODE ANN., COM. LAW § 14-3504(h). This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to this submission. While Ward Arcuri is notifying you of this incident, Ward Arcuri does not waive any rights or defenses relating to the incident, this notice, or the applicability of Maryland law on personal jurisdiction.

NATURE OF THE SECURITY BREACH OR UNAUTHORIZED USE OR ACCESS

Ward Arcuri is a law firm located in New York. Ward Arcuri was contacted by an third party claiming to have exfiltrated data from its network. Upon identifying the issue, Ward Arcuri promptly initiated an internal investigation, and hired a leading computer forensics firm to examine the Ward Arcuri network and to confirm the security of the Ward Arcuri computer systems. This investigation determined that an unknown third party was able to access data on Ward Arcuri’s network from July 17, 2021 to August 6, 2021. The investigation also confirmed that the third party no longer had access to Ward Arcuri’s network.

NUMBER OF MARYLAND RESIDENTS AFFECTED

Upon determining that personal information may have been accessible as a result of the incident, Ward Arcuri promptly began an effort of identifying individuals whose personal information was

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Phoenix	St. Louis	San Francisco	Seattle	Silicon Valley	Washington, D.C.	Wilmington				

Polsinelli PC, Polsinelli LLP in California



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involved, and the addresses for those individuals, in order to notify them as soon as possible. This review determined that the incident may have involved six (6) Maryland residents. Ward Arcuri notified the involved individuals via written notification on March 18, 2022. Enclosed is a copy of the notice that is being sent to the Maryland residents via first-class United States mail.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, Ward Arcuri promptly conducted an internal investigation and engaged a forensic security firm to further investigate the incident and confirm the security of Ward Arcuri's computer systems and network. Further Ward Arcuri undertook efforts to reduce the risk of a similar incident occurring in the future, including enhancing its technical security measures. Finally, as discussed above, Ward Arcuri provided notice of the incident to the potentially involved individual with information on how they can protect themselves against identity theft. Ward Arcuri also included an offer for twelve (12) months of complimentary credit monitoring and identity theft protection services in the notification letter for those individuals whose social security number was involved.

CONTACT INFORMATION

Please do not hesitate to contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

Pasha Sternberg

Enclosure

Ward Arcuri Foley & Dwyer Law Firm
Mail Handling Services
777 E Park Dr
Harrisburg, PA 17111



March 18, 2022

Dear [REDACTED]:

Ward Arcuri Foley & Dwyer Law Firm ("Ward Arcuri") is committed to the privacy of its clients and community members and is committed to keeping information entrusted to us confidential. Unfortunately, we are writing to advise you of a recent incident that may have involved some of your personal information. **We have no reason to believe that your personal information has been misused for the purpose of committing fraud or identity theft.** Nonetheless, because your information could have been involved, we are providing you this notice with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

What Happened? We have learned that an unauthorized third party accessed our computer network and acquired some of our data. Upon identifying the issue, we promptly initiated an internal investigation and hired a leading computer forensics firm to examine our network and to confirm the security of our computer systems. Through the investigation, we confirmed the unauthorized third party no longer had access to our network. However, we identified that between July 17, 2021 and August 6, 2021 they were able to access and acquire certain files on our network.

What Information Was Involved? Upon identifying that the unauthorized third party may have gained access to our files, we began a review of the information in those files to determine what, if any, personal information may have been involved. On November 29, 2021, we determined that the involved information included your name and driver's license/state ID number.

What We Are Doing? In addition to conducting an investigation into how the incident occurred, we are taking steps to reduce the risk of this type of incident occurring in the future, including implementing additional technical controls. We are also actively assisting the FBI's Albany field office in its investigation and will cooperate fully in their efforts. Additionally, although we have no evidence of information being used for the purposes of fraud or identity theft, we are offering you a complimentary one-year membership to Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

What You Can Do? You can find more information on steps to protect yourself against identity theft or fraud in the enclosed *Additional Important Information* sheet. We also encourage you to activate the complimentary credit monitoring services we are providing to you.

Other Important Information: Ward Arcuri is committed to the privacy and confidentiality of our clients and community members. We take our responsibility to safeguard your personal information seriously and apologize for any inconvenience or concern this incident might cause. For further information and assistance, please call 888-259-9992 from 8:00 AM CST- 5:00 PM CST, Monday through Friday.

Sincerely,
Ward Arcuri Foley & Dwyer Law Firm

ACTIVATING COMPLIMENTARY CREDIT MONITORING

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: **06/06/2022** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code:** [REDACTED] - **PLEASE NOTE THAT THE ACTIVATION CODE IS CASE-SENSITIVE.**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877-288-8057 to register with the activation code above.**

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

ADDITIONAL IMPORTANT INFORMATION

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained.

Other Important Information: You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax
1-866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
1-888-397-3742
www.experian.com
P.O. Box 2002
Allen, TX 75013

TransUnion
1-800-888-4213
www.transunion.com
P.O. Box 2000
Chester, PA 19016

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze
1-888-298-0045
www.equifax.com
P.O. Box 105788
Atlanta, GA 30348

Experian Security Freeze
1-888-397-3742
www.experian.com
P.O. Box 9554
Allen, TX 75013

TransUnion Security Freeze
1-888-909-8872
www.transunion.com
P.O. Box 160
Woodlyn, PA 19094

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/documents/bcfp_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

This notice was not delayed by a law enforcement investigation.

Maryland Residents: Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, <http://www.marylandattorneygeneral.gov/>.

New York State Residents: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; <https://ag.ny.gov/consumer-frauds/identity-theft>; (800) 771-7755.

North Carolina Residents: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov.

Vermont Residents: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).

Ward Arcuri Foley & Dwyer Law Firm
Mail Handling Services
777 E Park Dr
Harrisburg, PA 17111



March 18, 2022

Dear Administrator/Executor of the Estate of [REDACTED]:

Ward Arcuri Foley & Dwyer Law Firm ("Ward Arcuri") is committed to the privacy of its clients and community members and is committed to keeping information entrusted to us confidential. Unfortunately, we are writing to advise you of a recent incident that may have involved some of the above-referenced individual's personal information. **We have no reason to believe that above-referenced individual's personal information has been misused for the purpose of committing fraud or identity theft.** Nonetheless, because the above-referenced individual's information could have been involved, we are providing you this notice with guidance on what you can do to protect the above-referenced individual, should you feel it is appropriate to do so.

What Happened? We have learned that an unauthorized third party accessed our computer network and acquired some of our data. Upon identifying the issue, we promptly initiated an internal investigation and hired a leading computer forensics firm to examine our network and to confirm the security of our computer systems. Through the investigation, we confirmed the unauthorized third party no longer had access to our network. However, we identified that between July 17, 2021 and August 6, 2021, they were able to access and acquire certain files on our network.

What Information Was Involved? Upon identifying that the unauthorized third party may have gained access to our files, we began a review of the information in those files to determine what, if any, personal information may have been involved. On November 29, 2021, we determined that the involved information included the above-referenced individual's name, Social Security number, financial information, and medical information.

What We Are Doing? In addition to conducting an investigation into how the incident occurred, we are taking steps to reduce the risk of this type of incident occurring in the future, including implementing additional technical controls. We are also actively assisting the FBI's Albany field office in its investigation and will cooperate fully in their efforts.

What You Can Do? There are steps you can take to request a copy of the above-referenced individual's credit report. An executor or surviving spouse can place a request to any of the three national credit reporting agencies for copy of a deceased individual's credit report along with making one of the following notations:

- "Deceased – Do not issue credit"; or
- "If an application is made for credit, please notify the following person(s): (e.g., list a surviving relative, executor/trustee of the estate, and/or local law enforcement agency – notifying the relationship)."

Contact information for the credit reporting agencies is as follows:

Equifax
1-800-349-9960
www.equifax.com
P.O. Box 105788
Atlanta, GA 30348

Experian
1-888-397-3742
www.experian.com
P.O. Box 9554
Allen, TX 75013

TransUnion
1-888-909-8872
www.transunion.com
P.O. Box 160
Woodlyn, PA 19094

Other Important Information: For more information regarding identity theft and the deceased, please visit <https://helpcenter.idtheftcenter.org/s/article/Minimizing-the-Risk-for-Identity-Theft-of-Deceased>. You may wish to review the tips provided by the Federal Trade Commission on how to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (877-438-4338). You may also contact the FTC at: Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580. This notification was not delayed by law enforcement.

For More Information: Ward Arcuri is committed to the privacy and confidentiality of our clients and community members. We take our responsibility to safeguard your personal information seriously and apologize for any inconvenience or concern this incident might cause. For further information and assistance, please call 888-259-9992 from 8:00 AM CST- 5:00 PM CST, Monday through Friday.

Sincerely,

Ward Arcuri Foley & Dwyer Law Firm