



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Samuel Sica, III
Office: (267) 930-4802
Fax: (267) 930-4771
Email: ssica@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

March 3, 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 LeMans Corporation (“LeMans”) located at P.O. Box 5222, 3501 Kennedy Road, Janesville, WI, 53547-5222, and are writing to notify your office of an event that may affect the security of certain personal information relating to approximately six (6) Maryland residents. This notice may be supplemented with new facts learned subsequent to its submission. By providing this notice, LeMans 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 or about December 9, 2021, LeMans became aware that certain computer systems in its environment were inaccessible as a result of a malicious file encryption. LeMans immediately took steps to secure its systems and launched an investigation, with the assistance of third-party computer forensic specialists, to determine the full nature and scope of the event. LeMans also promptly notified federal law enforcement. The investigation determined that an unknown actor gained access to certain LeMans systems between November 10, 2021 and December 9, 2021, and downloaded certain files stored on the systems.

LeMans then undertook a comprehensive and time-intensive review of the involved files to determine what information was contained therein and to whom it related. Once complete, LeMans worked to confirm the identities and contact information for affected individuals. On or around January 31, 2022, LeMans completed this review.

The information that could have been subject to unauthorized access for Maryland residents include name and Social Security number.

Notice to Maryland Residents

On or about March 3, 2022, LeMans began mailing written notice of this event to affected individuals, which includes approximately six (6) Maryland residents. Written notice is being provided in substantially the same form as the letter attached hereto as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, LeMans moved quickly to investigate and respond, assess the security of its systems, and notify potentially affected individuals. LeMans also deployed additional network and endpoint monitoring. LeMans is working to implement additional cybersecurity safeguards and training to its employees. LeMans is providing access to credit monitoring and identity restoration services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, LeMans 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 credit card company and/or bank. LeMans 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. LeMans is also notifying other appropriate state regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4802.

Very truly yours,

Samuel Sica, III of
MULLEN COUGHLIN LLC

SZS/bld
Enclosure

EXHIBIT A

Return Mail Processing
PO Box 999
Suwanee, GA 30024

March 3, 2022

3 1 703 *****AUTO**ALL FOR AADC 300

SAMPLE A. SAMPLE - Individual - LeMans

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



Notice of [Extra1]

Dear Sample A. Sample:

LeMans Corporation (“LeMans”) is writing to inform you of an event that may have impacted some of your information. Although there is no indication that your information has been misused in relation to this event, we are providing you with information about the event, our response to it, and resources available to you to help protect your information, should you feel it appropriate to do so.

What Happened? On December 9, 2021, LeMans became aware that certain computer systems in its environment were inaccessible. We immediately took steps to secure our systems and launched an investigation to determine the full nature and scope of the event. We also promptly notified federal law enforcement. Our investigation determined that an unknown actor gained access to certain LeMans systems between November 10, 2021 and December 9, 2021, and downloaded certain files stored on our systems.

We then undertook a comprehensive and time-intensive review of the involved files to determine what information was contained therein and to whom it related. Once complete, we worked to confirm the identities and contact information for affected individuals. On or around January 31, 2022, we completed our review.

What Information Was Involved? The information contained on the impacted systems includes your name and [Extra2]. To date, we are unaware of any actual misuse of this information as a result of the event.

What We Are Doing. The privacy and security of information in our possession is one of our highest priorities. Upon discovery, we promptly launched an investigation to determine the scope of the event and worked quickly to secure our systems. We also further enhanced our network security by implementing additional network and endpoint monitoring.

While we have no indication of your information being misused as a result of this event, as an extra precaution, we are offering you access to twelve (12) months of complimentary credit monitoring and identity restoration services through Experian.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You may also review the information contained in the enclosed *Steps You Can Take to Help Protect Your Information*. There you will also find more information on the credit monitoring and identity restoration services we are making available to you. While LeMans will cover the cost of these services, you will need to complete the activation process. Enrollment instructions are enclosed with this letter.

For More Information. If you have additional questions, please call our dedicated assistance line toll-free at (833) 549-2137, Monday through Friday from 8 am - 10 pm Central, or Saturday and Sunday from 10 am - 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number **B028385**. You may also write to LeMans at P. O. Box 5222, 3501 Kennedy Road, Janesville, Wisconsin, 53547-5222.

Sincerely,

LeMans Corporation

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering a complimentary twelve (12) month membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

1. Ensure that you **enroll by: May 31, 2022** (Your code will not work after this date.)
2. **Visit** the Experian IdentityWorks website to enroll: **www.experianidworks.com/credit**
3. Provide your **activation code: ABCDEFGHI**

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 **(833) 549-2137** by **May 31, 2022**. Be prepared to provide engagement number **B028385** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR TWELVE (12) MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

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

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (833) 549-2137. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for twelve (12) months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

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

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. 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:

4. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
5. Social Security number;
6. Date of birth;
7. Addresses for the prior two to five years;
8. Proof of current address, such as a current utility bill or telephone bill;
9. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
10. 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 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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 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. his 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 Street, NW, Washington, DC 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; 1-410-528-8662 or 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 violator. 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 event. There are approximately 0 Rhode Island residents impacted by this event.