



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

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

February 18, 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 Manhattan School of Music, (“MSM”), located at 130 Claremont Ave, New York, NY, 10027, and are writing to notify your Office of an incident that may affect the security of information relating to fifteen (15) Maryland residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, MSM 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 June 17, 2021, MSM discovered suspicious activity related to an employee’s email account. MSM immediately launched an investigation with the assistance of third-party computer forensic specialists. This investigation determined that there was unauthorized access to certain MSM email accounts on separate occasions between April 17, 2021 and June 17, 2021. Upon learning this information, MSM undertook a lengthy and comprehensive process to review the contents of those accounts to determine whether they contained any sensitive information. MSM then conducted an additional review in order to identify contact information for potentially impacted individuals. That process completed on November 23, 2021 and MSM then took steps to notify potentially affected individuals. The information related to Maryland residents that could have been subject to unauthorized access varied by individual but includes name, address, date of birth, Social Security number, and/or financial account information.

Notice to Maryland Residents

On or about February 18, 2022, MSM began providing written notice of this incident to affected individuals, which includes approximately fifteen (15) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit A**. MSM also posted notice of this incident on its website and issued a press release. A copy of MSM's website notice is attached here as **Exhibit B** and a copy of MSM's press release is attached here as **Exhibit C**.

Other Steps Taken and To Be Taken

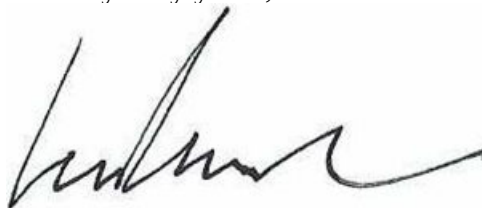
Upon discovering the event, MSM moved quickly to investigate and respond to the incident, assess the security of MSM systems, and notify potentially affected individuals. MSM is also working to implement additional safeguards and training to its employees. MSM is providing access to complimentary credit monitoring services for one year, through Kroll, to individuals whose information was potentially affected by this incident.

Additionally, MSM is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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.

Contact Information

Should you have any questions regarding this notification or event, or wish to discuss this matter further, please contact us at 267-930-4637.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Gregory Lederman', with a long horizontal flourish extending to the right.

Gregory Lederman of
MULLEN COUGHLIN LLC

Enclosure
GCL/mwj

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

NOTICE OF SECURITY INCIDENT

Dear <<First_Name>> <<Last_Name>>,

Manhattan School of Music (“MSM”) is writing to inform you of a recent incident which may impact some of your information. The confidentiality, privacy and security of information in MSM’s care is one of its highest priorities and MSM takes this incident very seriously. We are providing you with information about the event, our response, and steps you may take to better protect your information, should you feel it is appropriate to do so.

What Happened? MSM discovered suspicious activity related to an employee’s email account. MSM immediately launched an investigation with the assistance of third-party computer forensic specialists. This investigation determined that there was unauthorized access to certain MSM email accounts on separate occasions between April 17, 2021 and June 17, 2021. Upon learning this information, MSM undertook a lengthy and comprehensive process to review the contents of those accounts to determine whether they contained any sensitive information. MSM then conducted an additional review in order to identify contact information for potentially impacted individuals. That process completed on November 23, 2021.

What Information Was Involved? Although we are unaware of any actual or attempted misuse of your information, we are notifying you because certain information related to you was contained within the impacted email accounts. The impacted information relating to you includes your <<b2b_text_1(data elements)>>.

What We Are Doing. MSM takes the confidentiality and security of information very seriously. We promptly worked to investigate this incident and took steps to secure our email system. We also implemented additional security measures and we are reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event. Although you may already monitor your credit through your bank or credit card provider, as an added precaution, we are providing you with access to one year of complimentary identity monitoring services through Kroll. As we are not able to activate these services on your behalf, please review the “Steps You Can Take to Help Protect Your Information” section for instructions on how to activate these services.

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. We also encourage you to review the “Steps You Can Take to Help Protect Your Information” section of this letter.

For More Information. If you have additional questions, please call 1-???-???-???, Monday through Friday, between 9:00 am and 6:30 pm Eastern Time, excluding some U.S. holidays.

Sincerely,

Monica C. Christensen
Dean of Students

Susan Madden
VP Advancement and Alumni Relations

Steps You Can Take to Help Protect Your Information

Activate Identity Monitoring Services

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6(Date)>> to activate your identity monitoring services.

Membership Number: <<MembershipNumber(S_N)>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

If you prefer to activate these services offline and receive monitoring alerts via the US Postal Service, you may activate via our automated phone system by calling 1-888-653-0511, Monday through Friday, 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays. Please have your membership number located in your letter ready when calling. Please note that to activate monitoring services, you will be required to provide your name, date of birth, and Social Security number through our automated phone system.

Additional information describing your services is included with this letter.

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 1-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, 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 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 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. MSM is located at 130 Claremont Ave, New York, NY 10027.

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 \[#\] Rhode Island residents impacted by this incident.](#)



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

EXHIBIT B

NOTICE OF DATA PRIVACY INCIDENT

Manhattan School of Music (“MSM”) is providing notice of a recent incident that may affect the security of information pertaining to individuals, including certain current and former students and employees. The confidentiality, privacy, and security of information in MSM’s care is one of its highest priorities and MSM takes this incident very seriously. Although MSM has not received any reports of actual or attempted misuse of the impacted personal information, MSM is providing this notice in an abundance of caution.

What Happened? MSM discovered suspicious activity related to an employee’s email account. MSM immediately launched an investigation with the assistance of third-party computer forensic specialists. This investigation determined that there was unauthorized access to certain MSM email accounts on separate occasions between April 17, 2021 and June 17, 2021. Upon learning this information, MSM undertook a lengthy and comprehensive process to review the contents of those accounts to determine whether they contained any sensitive information. MSM then conducted an additional review in order to identify contact information for potentially impacted individuals. That process completed on November 23, 2021.

What Information Was Involved? The information contained within the email accounts at issue varied by individual but included name, addresses, [data elements].

What We Are Doing. MSM takes the confidentiality and security of information very seriously. We promptly worked to investigate this incident and took steps to secure our email system. We also implemented additional security measures and we are reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event. As an added precaution, MSM is also offering credit monitoring for individuals whose information was impacted.

For More Information. We understand some people may have additional questions concerning the incident. Individuals can direct questions to [vendor call center number], Monday through Friday, between [time] and [time].

What You Can Do. MSM encourages 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. MSM apologizes for any inconvenience this may cause and remains committed to the privacy and security of all information it maintains.

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 1-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, 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 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

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.

EXHIBIT C

**MANHATTAN SCHOOL OF MUSIC PROVIDES NOTICE
OF DATA PRIVACY INCIDENT**

New York, NY – February 18, 2022 – Manhattan School of Music (“MSM”) today is providing information about a recent event that may impact the privacy of some personal data related to current and former employees and students. The confidentiality, privacy, and security of information in MSM’s care is one of its highest priorities and MSM takes this incident very seriously. Although MSM has not received any reports of actual or attempted misuse of the impacted personal information, MSM is providing this notice in an abundance of caution.

What Happened? MSM discovered suspicious activity related to an employee’s email account. MSM immediately launched an investigation with the assistance of third-party computer forensic specialists. This investigation determined that there was unauthorized access to certain MSM email accounts on separate occasions between April 17, 2021 and June 17, 2021. Upon learning of this information, MSM undertook a lengthy and comprehensive process to review the contents of those accounts to determine whether they contained any sensitive information. MSM then conducted an additional review in order to identify contact information for potentially impacted individuals. That process completed on November 23, 2021.

What Information Was Involved? The information contained within the email accounts at issue varied by individual but included name, addresses, dates of birth, Social Security numbers, driver’s license numbers, financial account information, medical information, health insurance information, electronic signatures, passport numbers, student ID numbers, and usernames with passwords.

What We Are Doing. MSM takes the confidentiality and security of information very seriously. We promptly worked to investigate this incident and took steps to secure our email system. We also implemented additional security measures and we are reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event. As an added precaution, MSM is also offering credit monitoring for individuals whose information was impacted.

For More Information. We understand some people may have additional questions concerning the incident. Individuals can direct questions to 1-855-568-2078, Monday through Friday, between 9 am and 6:30pm Eastern Time.

What You Can Do. MSM encourages 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. MSM apologizes for any inconvenience this may cause and remains committed to the privacy and security of all information it maintains.

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 1-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, 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 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

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.