



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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January 13, 2022

VIA E-MAIL

Office of the Attorney General
Security Breach Notification
200 St. Paul Place, 25th Floor
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

We represent The Herrick Corporation dba Central Texas Iron Works (“CTIW”) located at 1100 Winchell Dr. Waco, Texas 76712, and write to notify your office of an incident that may affect the security of some personal information relating to one (1) Maryland resident. 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, CTIW 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 September 16, 2021, CTIW experienced a data security incident that impacted CTIW computer systems and caused a temporary disruption to certain operations. CTIW immediately responded and launched an investigation with the assistance of cybersecurity specialists to confirm the nature and scope of the incident and restore the operability of impacted computer systems. Through the investigation, CTIW learned that an unauthorized actor accessed CTIW systems and may have viewed or acquired data containing certain employee and customer information between September 15 and September 16, 2021. After determining the scope of information in the potentially impacted files, CTIW undertook efforts to locate address information for the affected individuals, put resources in place to assist, and provide direct notice.

The information that could have been subject to unauthorized access includes name, address, Social Security number, and date of birth.

Notice to Maryland Residents

On or about January 13, 2022, CTIW provided written notice of this incident to all affected individuals, which includes one (1) Maryland resident. 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 incident, CTIW moved quickly to investigate and respond to the incident, assess the security of CTIW systems, and notify potentially affected individuals. CTIW is also working to implement additional safeguards and training for its employees. CTIW is providing access to credit monitoring services for 12 months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, CTIW 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. CTIW 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 Attorneys General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact us at (267) 930-2303.

Very truly yours,

Lynda Jensen of
MULLEN COUGHLIN LLC

LRJ/mzb
Attachment

EXHIBIT A

Central Texas Iron Works
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223



To Enroll, Please Call:
1-800-939-4170
Or Visit:
[https://app.idx.us/account-
creation/protect](https://app.idx.us/account-creation/protect)
Enrollment Code: <<XXXXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

January 11, 2022

NOTICE OF <<SECURITY INCIDENT / DATA BREACH>>

Dear <<First Name>> <<Last Name>>,

Central Texas Iron Works ("CTIW") writes to make you aware of a recent incident that may impact the privacy of some of your information. We are providing you with notice of the incident, steps we have taken in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

What Happened?

On or about September 16, 2021, CTIW experienced a data security incident that impacted CTIW computer systems and caused a temporary disruption to certain operations. CTIW immediately responded and launched an investigation with the assistance of cybersecurity experts to confirm the nature and scope of the incident and restore the operability of impacted computer systems. Through the investigation, CTIW learned that an unauthorized actor accessed CTIW systems and may have viewed or acquired business data containing certain employee and customer information between September 15 to September 16, 2021. Information related to you may be included in the impacted data set. After determining the scope of information in the potentially impacted files, CTIW undertook efforts to locate address information for the affected individuals, put resources in place to assist, and provide this direct notice.

What Information Was Involved?

The information present in the CTIW system that may have been viewed or acquired as a result of this incident includes your name, address, date of birth, and Social Security number.

What We Are Doing.

CTIW treats the responsibility to safeguard the information entrusted to us as an utmost priority. CTIW responded immediately to this incident and has been working diligently to provide you with an accurate and complete notice of the incident in an abundance of caution. CTIW's immediate response to this incident also included prompt and ongoing correspondence with federal law enforcement authorities. As part of the ongoing commitment to the privacy and security of information in our care, CTIW reviewed our existing policies and procedures relating to data protection and security and implemented enhanced security controls on our remote access system. CTIW also changed system passwords and upgraded infrastructure hardware. CTIW will continue to evaluate additional security measures to mitigate any potential risk associated with this incident and to better prevent similar incidents in the future.

As an added precaution, CTIW is providing you with twelve (12) months of complimentary access to credit monitoring and identity restoration services through IDX, as well as guidance on how to better protect your information. Although CTIW is covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself using the enrollment instructions included within the enclosure to this letter.

What You Can Do.

You can find out more about how to safeguard your information in the enclosed *Steps You Can Take to Protect Information*. There, you will find additional information about the complimentary credit monitoring and identity restoration services we are offering and how to enroll. CTIW 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 over the next 12 to 24 months.

For More Information.

CTIW understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please call our dedicated assistance line at 1-800-939-4170, Monday through Friday from 8 am to 8 pm Central, excluding U.S. holidays.

Sincerely,

Randall Sandager

Randall Sandager, CPA, MBA
Controller
Central Texas Iron Works
P.O. BOX 2555
Waco, TX 76702-2555

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring

1. Website and Enrollment. Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code: <<Enrollment Code>>, also provided at the top of the letter. The deadline to enroll is April 11, 2022.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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, 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
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 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 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. CTIW is located at 1100 Winchell Dr. Waco, TX 76712.

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/>.