



MULLEN
COUGHLIN^{LLC}
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April 5, 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 Carroll Land Services, Inc. ("CLSI") located at 439 E. Main Street, Westminster, MD 21157, and are writing to notify your office of an incident that may affect the security of some personal information relating to one hundred sixty-five (165) 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, CLSI 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 January 4, 2022, CLSI became aware of certain files on its computer systems that were encrypted with malware by an unknown actor. CLSI promptly brought their systems offline, took steps to secure the impacted systems, and launch an investigation to determine the nature and scope of the event. While the investigation into the full scope of the event is ongoing, the investigation recently determined that the unknown actor may have gained access to certain CLSI systems between January 3, 2022, and January 4, 2022. As a result, the unknown actor may have had access to certain files within these systems.

The information that could have been subject to unauthorized access includes name, address, Social Security number, and Government issued ID information.

Notice to Maryland Residents

On or about April 5, 2022, CLSI provided written notice of this incident to all affected individuals, which includes one hundred sixty-five (165) Maryland residents. 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

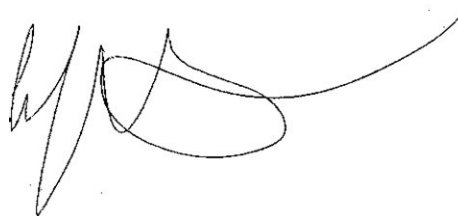
Upon discovering the event, CLSI moved quickly to investigate and respond to the incident, assess the security of CLSI systems, and notify potentially affected individuals. CLSI is also working to implement additional safeguards and training to its employees. CLSI is providing access to credit monitoring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

Additionally, CLSI 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. CLSI 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1509.

Very truly yours,

A handwritten signature in black ink, appearing to read 'G. Bautista', with a long, sweeping horizontal line extending to the right.

Gregory J. Bautista of
MULLEN COUGHLIN LLC

GJB /jlt
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

April 5, 2022

1 1 215 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



NOTICE OF SECURITY INCIDENT

Dear Sample A. Sample:

Carroll Land Services, Inc. d/b/a CLSI (“CLSI”) is writing to inform you of a recent event that may impact the privacy of some of your information. We are unaware of any attempted or actual misuse of your information at this time, but we are providing you with this letter as a precaution, to inform you of the event, our response, and steps you can take to protect your information, should you feel it necessary to do so.

What Happened?

On or about January 4, 2022, CLSI became aware of certain files on its computer systems that were encrypted with malware by an unknown actor. CLSI promptly brought their systems offline, took steps to secure the impacted systems, and launch an investigation to determine the nature and scope of the event. While the investigation into the full scope of the event is ongoing, the investigation recently determined that the unknown actor may have gained access to certain CLSI systems between January 3, 2022 and January 4, 2022. As a result, the unknown actor may have had access to certain files within these systems.

What Information Was Involved?

While the investigation into this event is ongoing, it has been determined that your information was present on systems that the unauthorized individual may have had access to. On March 2, 2022, CLSI determined that this information may include your name, address, [data elements]. Please note that, to date, we are unaware of any actual or attempted misuse of your information as a result of this incident.

What We Are Doing.

CLSI takes this incident and the security of your information seriously. Upon learning of the event, we moved quickly to investigate and respond with the assistance of third-party cybersecurity specialists. The investigation and response included confirming the security of our systems, notifying law enforcement, further strengthening our technical controls, and implemented additional security measures. In addition to these efforts, CLSI also reviewed existing policies and cybersecurity measures to further protect against events like this in the future. CLSI is notifying potentially impacted individuals, including you, so that you may take steps to best protect your information, should you feel it appropriate to do so.

Out of an abundance of caution, we are offering you access to credit monitoring and identity theft protection services for 24 months at no cost to you through Experian. You may find the information on how to enroll in these services in the enclosed “Steps You Can Take to Protect Personal Information.” We encourage you to enroll in these services as we are not able to do so on your behalf.

What You Can Do.

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements monitoring your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed “*Steps You Can Take to Protect Personal Information.*”

For More Information.

We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-833-514-1011 Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays).

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Hackett', with a stylized, cursive script.

Martin W. Hackett
President and Chairman of the Board

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for 24 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24 months of membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

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

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-833-514-1011 by July 31, 2022. Be prepared to provide engagement number B035291 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-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 specialists 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.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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.

* 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.

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
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. CLSI is located at 439 E. Main Street, Westminster, MD 21157.

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 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/>.