



MULLEN
COUGHLIN^{LLC}
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May 10, 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 Davis Landscape LTD (“Davis”), located at 2340 Paxton Church Road, Harrisburg, PA 17110, and are writing to notify your Office of an incident that may affect the security of certain information relating to two (2) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Davis 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 April 16, 2022, Davis discovered suspicious activity related to certain computer systems within its environment. Upon learning of this activity, Davis immediately took steps to secure its network and launched a thorough investigation, with the assistance of third-party specialists, to determine the nature and scope of the incident. The investigation determined that certain systems on the Davis network were subject to unauthorized access between September 16, 2021 and April 16, 2022. As a result, the unauthorized actor may have had access to certain files within these systems and information may have been accessed or taken. Davis then began a diligent review of the impacted files in order to identify the information contained on these systems. While the investigation remains ongoing, this review determined on or about April 27, 2022 that the potentially impacted data contained sensitive information. While the information varies for each individual, the information that could have been subject to unauthorized access includes name, date of birth, driver’s license number, and/or Social Security number.

Notice to Maryland Residents

On or about May 10, 2022, Davis began providing written notice of this incident to two (2) 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, Davis moved quickly to investigate and respond to the incident, assess the security of Davis systems, and identify potentially affected individuals. Further, Davis notified federal law enforcement regarding the event. Out of an abundance of caution, Davis is providing access to complimentary credit monitoring services for one (1) year, through Experian, to individuals whose information was potentially affected by this incident.

Additionally, Davis 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. Davis is also providing written notice of this incident to relevant state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4637.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Gregory Lederman', written over a horizontal line.

Gregory Lederman of
MULLEN COUGHLIN LLC

GCL/mep
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

May 10, 2022

1 1 1 *****AUTO**MIXED AADC 300

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



Dear Sample A. Sample:

Davis Landscape LTD (“Davis”) writes to inform you of a recent incident that may have impacted the security of some of your information. We are providing you with information about the event, and steps you may take to help protect your information, should you feel it is appropriate to do so.

What Happened? On or about April 16, 2022, Davis discovered suspicious activity related to certain computer systems within its environment. We immediately took steps to secure our network, and launched a thorough investigation, with the assistance of third-party specialists, to determine the nature and scope of the incident. The investigation determined that certain systems on our network were subject to unauthorized access between September 16, 2021 and April 16, 2022. As a result, the unauthorized actor may have had access to certain files within these systems and information may have been accessed or taken during the incident.

What Information was Involved? Upon learning this information, Davis quickly began a diligent review of the impacted files in order to identify the information contained on these systems. While our investigation remains ongoing, this review recently identified information related to you may have been impacted, including your name, date of birth, driver’s license number, and/or Social Security number. Although we do not have any indication that your information was subject to actual or attempted misuse as a result of this incident, we are notifying you out of an abundance of caution.

What We Are Doing. The security of information in Davis’ care is one of our highest priorities. Upon becoming aware of this incident, we immediately took steps to confirm the security of our systems. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our policies, procedures, and processes related to the security of information and we are implementing enhanced security measures to reduce the likelihood of a similar event in the future. We are notifying potentially impacted individuals, including you, so that you may take steps to help protect your information, should you feel it is appropriate to do so. Davis notified law enforcement and is also reporting this incident to state regulators, as required.

As an added precaution, we are offering you complimentary access to twelve (12) months of credit monitoring and identity theft restoration services through Experian. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Information* for additional information on these services.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and credit reports for suspicious activity and to detect errors. You can review the enclosed *Steps You Can Take to Help Protect Your Information*, which contains information on what you can do to better protect against the possibility of identity theft and fraud as well as the free credit monitoring and identity theft protection services we are offering.

For More Information. We sincerely regret any inconvenience or concern this may have caused you. We understand you may have questions that are not answered in this letter. To ensure your questions are answered in a timely manner, you can call our dedicated assistance line at (833) 559-2448, Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays). Be prepared to provide your engagement number B052320.

Sincerely,

Scot Davis
President
Davis Landscape LTD

Steps You Can Take to Help Protect Your Information

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for twelve (12) 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 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.

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 twelve (12) month 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 August 31, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://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 **(833) 559-2448** by **August 31, 2022**. Be prepared to provide engagement number **B052320** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 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.

* 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 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 credit 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 fraud alert or 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 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. Davis Landscape LTD is located at 2340 Paxton Church Rd, Harrisburg, PA 17110.

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.