



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

Brian F. Fox  
Office: (267) 930-4777  
Fax: (267) 930-4771  
Email: bfox@mullen.law

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

May 12, 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 IHF Online, LLC (“IHF”) located at 30 N. Gould Street, STE R, Sheridan, Wyoming 82801, and are writing to notify your office of an event that may affect the security of certain personal information relating to approximately nineteen (19) Maryland residents. By providing this notice, IHF 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 November 15, 2021, IHF became aware of suspicious activity relating to its website. IHF quickly launched an investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the activity and what information may have been affected. The investigation determined that an unknown actor accessed payment card information of individuals who made purchases on IHF’s website between November 9, 2021 and November 15, 2021. Once IHF became aware of the suspicious activity, IHF quickly removed the malicious code and secured its website. On or around January 31, 2022, IHF completed its investigation into the nature and scope of the activity. Once complete, IHF conducted a comprehensive internal review to determine what customers were affected and the contact information associated with those customers to provide notifications. IHF recently completed this review.

The information that could have been subject to unauthorized access includes name and payment card information.

### **Notice to Maryland Residents**

On or about May 12, 2022, IHF provided written notice of this event to affected individuals, including approximately nineteen (19) 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 becoming aware of the event, IHF moved quickly to investigate, assess the security of its systems, and identify potentially affected individuals. Further, IHF notified federal law enforcement regarding the event. IHF is also working to implement additional technical and administrative safeguards. IHF is providing access to credit monitoring services for 12 months through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, IHF 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. IHF 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.

IHF is also providing written notice of this event to appropriate state regulators, and to the major consumer reporting agencies.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4777.

Very truly yours,

Brian F. Fox of  
MULLEN COUGHLIN LLC

BFF/ams  
Enclosure

# EXHIBIT A



Return Mail Processing  
PO Box 999  
Suwanee, GA 30024

5 1 647 \*\*\*\*\*SNGLP  
SAMPLE A. SAMPLE - Individual Notice Letter



APT ABC  
123 ANY ST  
ANYTOWN, US 12345-6789



May 12, 2022

[Extra1]

Dear Sample A. Sample:

IHF Online, LLC (“IHF”) is writing to notify you of a recent event that may involve some of your information. Although at this time there is no indication that your information has been fraudulently misused in relation to this event, we are providing you with information about the event, our response to it, and additional measures you can take to protect your information, should you feel it appropriate to do so.

**What Happened?** On November 15, 2021, we became aware of suspicious activity relating to our website. We quickly launched an investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the activity and what information may have been affected. The investigation determined that an unknown actor accessed the credit card information of individuals who made purchases on the IHF website with credit cards for the limited period of time of November 9, 2021 to November 15, 2021. Once we became aware of the suspicious activity, we quickly worked to ensure that the unknown actor was no longer able to access customer credit card information. On or around January 31, 2022, we completed our investigation into the nature and scope of the activity. We are not aware of the unknown actor having any unauthorized access to customer credit card information at any time after November 15, 2021.

We also conducted a comprehensive review to determine what information was affected and to whom the information related. The review was recently completed, and determined that a limited amount of your information was present in the information potentially accessed by the unknown third-party.

**What Information Was Involved?** Our investigation determined that the names and credit card information of individuals who made purchases on IHF’s website with credit cards between November 9, 2021 and November 15, 2021, were impacted. To date, IHF has not received any reports of fraudulent misuse of any information potentially impacted by this event.

**What We Are Doing.** The confidentiality, privacy, and security of your information are among our highest priorities, and we have security measures in place to protect information in our systems. Upon learning of the activity, we immediately took steps to further secure our systems and investigate the event.

While we are unaware of any fraudulent misuse of your information as a result of this event, as an additional precaution, we are offering you access to 12 months of complimentary credit monitoring services through Experian. Details of this offer and instructions on how to activate these services are enclosed with this letter.

**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. Please also review the enclosed “Steps You Can Take to Help Protect Your Information,” which contains information on what you can do to safeguard against possible misuse of your information should feel it appropriate to do so. You may also enroll in the complimentary credit monitoring services.

**For More Information.** If you have additional questions, you may contact our toll-free dedicated assistance line at (833) 575-2854. This toll-free line is available 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 B053255. You may also write to IHF at 30 N. Gould Street, STE R, Sheridan, Wyoming 82801.

We apologize for any inconvenience or concern this incident may cause.

Sincerely,

IHF Online, LLC

## 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 IdentityWorks<sup>SM</sup> for one (1) year.

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 one (1) year 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](http://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 one (1) year 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) 575-2854** by **August 31, 2022**. Be prepared to provide engagement number **B053255** 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 ExtendCARE™:** 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](http://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:

| <b>Equifax</b>                                                                                                                  | <b>Experian</b>                                                             | <b>TransUnion</b>                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| <a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a> | <a href="https://www.experian.com/help/">https://www.experian.com/help/</a> | <a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a> |
| 1-888-298-0045                                                                                                                  | 1-888-397-3742                                                              | 1-833-395-6938                                                                              |
| Equifax Fraud Alert, P.O. Box 105069<br>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<br>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](http://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](mailto: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](http://www.oag.state.md.us). IHF Online, LLC is located at 30 N. Gould Street, STE R, Sheridan, Wyoming 82801.

*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](http://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](http://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](http://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 0 Rhode Island residents impacted by this incident.