

CIPRIANI & WERNER

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

MICHAEL BONNER
MBonner@c-wlaw.com

DANIEL HAIER
DHaier@c-wlaw.com

450 Sentry Parkway, Suite 200
Blue Bell, PA 19422

Phone: (610) 567-0700
Fax: (610) 567-0712

www.C-WLAW.com

A Mid-Atlantic Litigation Firm

Visit us online at
www.C-WLAW.com

May 23, 2022

Via Email (idtheft@oag.state.md.us)

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

RE: Data Security Incident Notification

To Whom It May Concern:

We serve as counsel Vance Street Capital (“VSC”), located at 11150 Santa Monica Blvd, Suite 750, Los Angeles, CA 90025. We write to provide notification of a recent data security incident. By providing this notice, VSC does not waive any rights or defenses under Maryland law, including the data breach notification statute.

On November 17, 2021, VSC discovered that an employee email account may have been accessed by an unauthorized party and immediately began an investigation, which included working with third-party specialists to determine the nature and scope of the access. The investigation determined the email account was accessed on November 16 and 17, 2021. Therefore, VSC reviewed the contents of the email account to determine the type of information it contained and to whom it related. VSC completed its review on April 13, 2022 and began confirming address information for potentially impacted individuals.

At this time, VSC is aware of personal information related to one (1) resident of Maryland who may have been impacted by this incident. The information potentially impacted for this individual includes first and last name in combination with the following data elements: health insurance information, date of birth, and Social Security number.

VSC provided written notice to the potentially impacted individuals via First Class Mail on May 23, 2022. A copy of the notice is attached as ***Exhibit A***. While VSC has no reason to believe that any personal information was misused as a result of this incident, VSC is offering the potentially impacted Maryland resident complimentary credit monitoring and identity protection services for 12 months.

In response to this incident, VSC changed account passwords, enhanced security protocols, and is reviewing its policies and procedures related to data protection.

Please contact me should you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'MB', is positioned above a horizontal line.

Michael Bonner, Esq.
CIPRIANI & WERNER, P.C.
Counsel for Vance Street Capital

Exhibit A



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

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

<<b2b_text_1 (subject line)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

We are writing to notify you of a recent incident that may affect the privacy of certain information provided to us.

What Happened: On November 17, 2021, we discovered that a Vance Street Capital employee email account may have been accessed by an unauthorized party and we immediately began an investigation, which included working with third-party specialists to determine the nature and scope of the access. The investigation determined the email account was accessed on November 16 and 17, 2021. Therefore, we began reviewing the contents of the email account to determine the type of information it contained and to whom it related. We completed our review on April 13, 2022 and began confirming address information for potentially impacted individuals.

What Information Was Involved: The investigation further determined that the type of information contained in the email account may have included the following information: <<b2b_text_2 ("name" and data elements)>><<b2b_text_3 (data elements cont.)>>.

What We Are Doing: We take this incident very seriously. Fortunately, to date, we have no evidence of actual or attempted misuse of any information as a result of this incident. In an abundance of caution, however, we are providing you access to 12 months of identity monitoring services at no cost to you. Furthermore, in response to this incident, we have reviewed our policies and procedures related to data protection with our security consultants and changed all login and password information.

What You Can Do: We encourage you to activate the identity monitoring services we are making available to you. Instructions about how to activate these services and additional resources available to you are included in the enclosed *Steps You Can Take to Help Protect Your Information*.

We sincerely regret any concern this incident may cause you. The privacy and security of information is important to us, and we will continue to take steps to protect information in our care.

For More Information: To better assist you, we have worked with our response partner, Kroll, to establish a dedicated assistance line. If you have any additional questions, please contact (XXX) XXX-XXXX, Monday through Friday from 6:00 a.m. - 3:30 p.m. Pacific Time (excluding major U.S. holidays). You may also write to us at 11150 Santa Monica Blvd, Suite 750, Los Angeles, CA 90025 or jboltinghouse@vancestreetcapital.com.

Sincerely,

Richard Crowell, Brian Martin, Mike Janish, Richard Roeder, John LeRosen,
on behalf of Vance Street Management LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Activate Your Identity Monitoring

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 (activation date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

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

Additional information describing your services is included with this letter.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements for suspicious activity and to detect errors. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus, TransUnion, Experian, and Equifax. To order your free credit report, visit www.annualcreditreport.com or call 1-877-322-8228. Once you receive your credit report, review it for discrepancies and identify any accounts you did not open or inquiries from creditors that you did not authorize. If you have questions or notice incorrect information, contact the credit reporting bureau.

You 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, 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 lasting seven years. Should you wish to place a fraud alert, please contact any of the three credit reporting bureaus listed below.

As an alternative to a fraud alert, you 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 your 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 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., III, etc.);
2. Social Security number;
3. Date of birth;
4. Address for the prior two to five years;
5. Proof of current address, such as a current utility or telephone bill;
6. A legible photocopy of a government-issued identification card (e.g., state driver’s license or identification card); 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:

TransUnion 1-800-680-7289 www.transunion.com	Experian 1-888-397-3742 www.experian.com	Equifax 1-888-298-0045 www.equifax.com
TransUnion Fraud Alert P.O. Box 2000 Chester, PA 19016-2000	Experian Fraud Alert P.O. Box 9554 Allen, TX 75013	Equifax Fraud Alert P.O. Box 105069 Atlanta, GA 30348-5069
TransUnion Credit Freeze P.O. Box 160 Woodlyn, PA 19094	Experian Credit Freeze P.O. Box 9554 Allen, TX 75013	Equifax Credit Freeze P.O. Box 105788 Atlanta, GA 30348-5788

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the credit reporting bureaus, the Federal Trade Commission (FTC), or your state Attorney General. The FTC also encourages those who discover that their information has been misused to file a complaint with them. The FTC may be reached at 600 Pennsylvania Ave. NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

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, the California state Attorney General, and the FTC. 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; 1-888-743-0023; and www.oag.state.md.us. Vance Street Capital may be contacted at 11150 Santa Monica Blvd, Suite 750, Los Angeles, CA 90025.

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: (i) the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; (ii) the consumer reporting agencies may not report outdated negative information; (iii) access to your file is limited; (iv) you must give consent for credit reports to be provided to employers; (v) you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; (vi) 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 https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, FTC, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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.



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'll 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.