



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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75 S. Clinton Avenue, Suite 510
Rochester, NY 14604

June 27, 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 Acts Retirement Services, Inc. and Affiliates (“Acts Retirement”) located at 420 Delaware Dr, Fort Washington, PA 19034, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one hundred and fifty-six (156) Maryland residents. This investigation is ongoing and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Acts Retirement 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

In April 2022, Acts Retirement detected suspicious activity on its network. Upon learning of this activity, Acts Retirement immediately took steps to further secure its systems and to investigate the identified activity. Acts Retirement subsequently worked diligently to investigate this activity with assistance from computer forensic specialists to confirm the security of Acts Retirement’s network and to assess any impact on its systems, including any risk to information stored on the network. On or around April 29, 2022, while these efforts were ongoing, Acts Retirement identified additional suspicious activity, which it promptly investigated. On or around May 2, 2022, the investigation confirmed that certain data within a limited number of network locations was accessed or acquired without authorization on April 29, 2022.

Acts Retirement reviewed these locations to confirm the specific information present. On May 17, 2022, while this review was ongoing, Acts Retirement identified certain individuals to whom

the potentially impacted information related. Concurrent to the review, Acts Retirement reconciled available records and identified available contact information so it could notify these individuals. On June 13, 2022, Acts identified Maryland residents whose information was potentially impacted. The information that could have been subject to unauthorized access varies by individual but includes name, Social Security Number, and financial account and routing number.

Notice to Maryland Residents

On or about June 27, 2022, Acts Retirement began providing written notice of this incident to one hundred and fifty-six (156) 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

Acts Retirement moved quickly to investigate and to respond to the incident, including taking steps to secure its network and assessing any risk to information on its network so it could notify impacted individuals. Acts Retirement is providing access to credit monitoring services for 12 months through TransUnion to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. Additionally, Acts Retirement is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Acts Retirement 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) 930-4741.

Very truly yours,

James Paulino of
MULLEN COUGHLIN LLC

JMP/mah
Enclosure

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

NOTICE OF <<VARIABLE HEADER>>

Dear <<Name 1>>:

Acts Retirement Services, Inc. and Affiliates ("Acts Retirement") writes to notify you, as a current or former employee, of a recent event that may impact the security of some of your information. We are providing you with information about the event, our response to it, and resources available to you to help protect your information, should you feel it appropriate to do so. We are also offering you complimentary credit monitoring services through TransUnion at no cost; enrollment instructions are on the following pages.

What Happened? In April 2022, Acts Retirement detected suspicious activity on our network. Upon learning of this activity, we immediately took steps to further secure our systems, and to initiate a comprehensive investigation with the assistance of external computer forensic specialists. We worked diligently to investigate this activity and to confirm its impact on our systems, including the data potentially at risk. On or around May 2, 2022, we determined certain archived data within a limited number of network locations was accessed or acquired without authorization on April 29, 2022. We are notifying you because beginning on May 17, 2022, we determined your information may have been accessible to the unauthorized actor.

What Information Was Involved? We determined the impacted information may include your name and <<Data Elements>>.

What We Are Doing. We take the security of all information entrusted in our care very seriously. Upon becoming aware of the event, we immediately initiated a comprehensive investigation. We continue to assess our network security and to implement additional measures as appropriate. As an added precaution, we are offering you access to complimentary credit monitoring services for <<CM Length>> through TransUnion. Enrollment instructions 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. You should immediately report any suspicious activity to law enforcement. We also encourage you to review the information contained in the enclosed *Steps You Can Take To Help Protect Information* and to enroll in the complimentary monitoring services.

For More Information. We understand that you may have questions that are not addressed in this notice. If you have additional questions, please call our dedicated assistance line at 877-357-3343, which is available from 9:00 AM to 9:00 PM EST Monday through Friday (excluding major U.S. holidays).

Sincerely,

Acts Retirement Services, Inc. and Affiliates

STEPS YOU CAN TAKE TO HELP PROTECT INFORMATION

Enroll in Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for <<CM Length>> provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies. To enroll in this service, go directly to the *myTrueIdentity* website at www.mytrueidentity.com and in the space referenced as “Enter Activation Code”, enter the following unique 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code << **Engagement Number** >> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the *myTrueIdentity* online Credit Monitoring service anytime between now and <<**Enrollment Date**>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have credit file at TransUnion®, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

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 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
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

Internal Revenue Service Identity Protection PIN (IP PIN)

You may also obtain an Identity Protection PIN (IP PIN) from the Internal Revenue Service, a six-digit number that prevents someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. The IP PIN is known only to you and the IRS, and helps the IRS verify your identity when you file your electronic or paper tax return. Even though you may not have a filing requirement, an IP PIN still protects your account. If you do not already have an IP PIN, you may get an IP PIN as a proactive step to protect yourself from tax-related identity theft either online, by paper application or in-person. Information about the IP PIN program can be found here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

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 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.

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. Acts Retirement is located at 420 Delaware Dr, Fort Washington, PA 19034.

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, 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 <http://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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 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 <<#>> Rhode Island residents impacted by this incident.



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75 S. Clinton Avenue, Suite 510
Rochester, NY 14604

July 15, 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: Supplemental Notice of Data Event

Dear Sir or Madam:

We continue to represent Acts Retirement Services, Inc. and Affiliates (“Acts Retirement”), located at 420 Delaware Dr, Fort Washington, PA 19034, and are writing to supplement our June 27, 2022 notification to your office. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this supplemental notice, Acts Retirement 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.

Since the previous notification, Acts Retirement continued its diligent review of the limited accessed network locations to identify potentially impacted individuals. Acts Retirement also reconciled its review efforts with internal records to identify the appropriate contact information for potentially impacted individuals so they could be notified. After completing those review efforts, Acts Retirement identified an additional Maryland resident requiring notification. On or about July 15, 2022, Acts Retirement provided notice to one (1) additional Maryland resident. The types of personal information potentially impacted for the Maryland resident include name and Social Security Number. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4741.

Very truly yours,

James Paulino of
MULLEN COUGHLIN LLC

Mullen.law

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

NOTICE OF <<VARIABLE HEADER>>

Dear <<Name 1>>:

Acts Retirement Services, Inc. and Affiliates ("Acts Retirement") writes to notify you of a recent event that may impact the security of some of your information. We are providing you with information about the event, our response to it, and resources available to you to help protect your information, should you feel it appropriate to do so. We are also offering you complimentary credit monitoring services through TransUnion at no cost; enrollment instructions are on the following pages.

What Happened? In April 2022, Acts Retirement detected suspicious activity on our network. Upon learning of this activity, we immediately took steps to further secure our systems, and to initiate a comprehensive investigation with the assistance of external computer forensic specialists. We worked diligently to investigate this activity and to confirm its impact on our systems, including the data potentially at risk. On or around May 2, 2022, we determined certain archived data within a limited number of network locations was potentially accessed or acquired without authorization on April 29, 2022, and on May 17, 2022, after additional investigation, we identified documents within those locations at risk of access or acquisition. We thereafter undertook a comprehensive review of the documents to confirm the precise information present. This review continued until July 1, 2022, at which time we confirmed the potentially impacted individuals. We are notifying you because we determined your information may have been accessible to the unauthorized actor.

What Information Was Involved? We determined the impacted information may include your name and <<Breached Elements>>.

What We Are Doing. We take the security of all information entrusted in our care very seriously. Upon becoming aware of the event, we immediately initiated a comprehensive investigation. We continue to assess our network security and to implement additional measures as appropriate. As an added precaution, we are offering you access to complimentary credit monitoring services for <<CM Length>> months through TransUnion. Enrollment instructions 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. You should immediately report any suspicious activity to law enforcement. We also encourage you to review the information contained in the enclosed *Steps You Can Take To Help Protect Information* and to enroll in the complimentary monitoring services.

For More Information. We understand that you may have questions that are not addressed in this notice. If you have additional questions, please call our dedicated assistance line at 877-357-3343, which is available from 9:00 AM to 9:00 PM EST Monday through Friday (excluding major U.S. holidays).

Sincerely,

Acts Retirement Services, Inc. and Affiliates

STEPS YOU CAN TAKE TO HELP PROTECT INFORMATION

Enroll in Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for <<Cm length>> months provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies. To enroll in this service, go directly to the *myTrueIdentity* website at www.mytrueidentity.com and in the space referenced as “Enter Activation Code”, enter the following unique 12-letter Activation Code <<Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code << **Engagement Number** >> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the *myTrueIdentity* online Credit Monitoring service anytime between now and <<**Enrollment Date**>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have credit file at TransUnion®, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

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 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

Internal Revenue Service Identity Protection PIN (IP PIN)

You may also obtain an Identity Protection PIN (IP PIN) from the Internal Revenue Service, a six-digit number that prevents someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. The IP PIN is known only to you and the IRS, and helps the IRS verify your identity when you file your electronic or paper tax return. Even though you may not have a filing requirement, an IP PIN still protects your account. If you do not already have an IP PIN, you may get an IP PIN as a proactive step to protect yourself from tax-related identity theft either online, by paper application or in-person. Information about the IP PIN program can be found here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

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. Acts Retirement is located at 420 Delaware Dr, Fort Washington, PA 19034.

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.