



Baker&Hostetler LLP

1735 Market Street
Suite 3300
Philadelphia, PA 19103-7501
T 215.568.3100
F 215.568.3439
www.bakerlaw.com

Benjamin D. Wanger
direct dial: 215.564.1601
bwanger@bakerlaw.com

June 27, 2022

VIA EMAIL: IDTHEFT@OAG.STATE.MD.US

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

Re: Incident Notification

Dear Attorney General Frosh:

We are writing on behalf of our client, Churchill Mortgage Corporation (“Churchill”), a mortgage company with a principal place of business in Brentwood, TN, to notify you of a security incident involving Maryland residents.

Churchill recently concluded its investigation into a security incident involving unauthorized access to three employees’ email accounts. Upon identifying the unauthorized activity, Churchill promptly secured the email accounts and launched an investigation. The investigation determined that an unauthorized party accessed the employees’ email accounts between January 6, 2022 and January 7, 2022. The investigation was unable to determine which emails or attachments, if any, were viewed by the unauthorized party. Out of an abundance of caution, however, Churchill conducted a thorough review of the emails and attachments in the mailboxes. On May 27, 2022, Churchill determined that they contained personal information of nine (9) Maryland residents, including their name and one or more of the following: Social Security number, driver’s license number, credit or debit card number, and/or financial account number.

On June 27, 2022, Churchill is providing written notice via United States Postal Service First Class Mail to the Maryland residents whose personal information was potentially accessed by an unauthorized party, in accordance with Md. Code Ann., Com. Law § 14-3504. A copy of the notification letter is enclosed. Churchill is offering each Maryland resident whose Social Security number and/or driver’s license number was involved a complimentary, one-year membership to credit monitoring and identity theft prevention services through Experian.

June 27, 2022

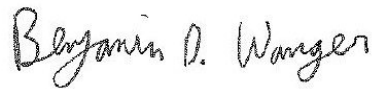
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Churchill is encouraging all notice recipients to remain vigilant by reviewing their financial accounts for unauthorized activity. Churchill has also established a dedicated, toll-free phone number where all notice recipients may obtain more information regarding the incident.

To help prevent a similar incident from occurring in the future, Churchill has implemented additional security measures to enhance the security of its network and continues to train its employees concerning data security.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Benjamin D. Wanger". The signature is written in a cursive, slightly slanted style.

Benjamin D. Wanger
Counsel

Enclosure



CHURCHILL
MORTGAGE®

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>>

Dear <<Name1>>:

Churchill Mortgage Corporation recognizes the importance of protecting the information we maintain. We are writing to inform you of an incident that involved some of your personal information. This notice explains the incident, measures we have taken, and additional steps you may consider in response.

We recently concluded our investigation of an incident involving unauthorized access to three employees' email accounts. Upon first identifying the unauthorized activity, we secured the accounts and commenced an investigation. In connection with this investigation, we discovered that an unauthorized party accessed the email accounts on January 6, 2022 and January 7, 2022. The investigation was unable to determine which emails or attachments, if any, were viewed by the unauthorized party. Out of an abundance of caution, however, we conducted a review of the emails and attachments in the mailboxes. On May 27, 2022, we identified an email or attachment containing your name and <<Breached Elements>>.

We encourage you to remain vigilant against the possibility of fraud and identity theft by reviewing your account statements and credit reports for any unauthorized activity. If you see charges or activity you did not authorize, please contact the relevant financial institution immediately. We are also offering you a complimentary one-year membership to Experian's IdentityWorks identity monitoring services. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. Experian's IdentityWorks is completely free to you and enrolling in this program will not hurt your credit score. **For more information on IdentityWorks, including instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take to protect your information, please see the pages that follow this letter.**

We regret any inconvenience or concern this incident may cause. To help prevent a similar incident from occurring in the future, we have implemented additional security measures to enhance the security of our network and we are continuing to train our employees concerning data security. If you have any questions, please contact 877-984-9283 Monday through Friday from 9:00 am – 9:00 pm Eastern.

Sincerely,

Liliana Nigrelli,
Chief Compliance Officer

To help protect your identity, we are offering a complimentary one-year membership to Experian IdentityWorksSM. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks In Three Easy Steps

1. ENROLL by: <<Enrollment Deadline>> (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: <<Activation Code>>

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 1-877-288-8057. Be prepared to provide engagement number <<Engagement Number>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **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.

Activate your membership today at <https://www.experianidworks.com/3bcredit> or call 1-877-288-8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 1-877-288-8057.

* 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.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Churchill Mortgage Corporation is located at 1749 Mallory Lane #100, Brentwood TN 37027, and can be contacted at (908) 428-6559.

Additional information for residents of the following states:

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

Rhode Island: This incident involves <<#>> individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov