



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Matthew V. Toldero
Office: (267) 930-4554
Fax: (267) 930-4771
Email: mtoldero@mullen.law

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

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: Notice of Data Event

Dear Sir or Madam:

We represent Gas South LLC ("Gas South"), located at 3625 Cumberland Blvd, Suite 1500 Atlanta, GA 30339, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately thirteen (13) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Gas South 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 February 21, 2022, Gas South discovered suspicious activity on certain Gas South computer systems. Upon identifying unusual activity, Gas South disconnected these systems from the network and commenced an investigation. The investigation determined that an unknown actor had access to limited Gas South systems between February 13, 2022 and February 23, 2022. Because the investigation determined that there was unauthorized access to certain data, Gas South initiated a programmatic and manual review of the potentially accessible data to determine the type of information and to whom it related. This review was completed on June 24, 2022. Following its initial review, Gas South worked diligently to identify and populate address information for any potentially affected individuals to provide notice to those individuals. On July 12, 2022, as a result of a National Change of Address update, Gas South first learned that a Maryland resident was potentially impacted as a result of this event.

The information that could have been subject to unauthorized access includes name and Social Security number.

Notice to Maryland Residents

On or about July 15, 2022, Gas South began providing written notice of this incident to approximately thirteen (13) 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, Gas South moved quickly to investigate and respond to the incident, assess the security of Gas South systems, and identify potentially affected individuals. Further, Gas South notified federal law enforcement regarding the event. Gas South is providing access to credit monitoring services for twelve (12) months through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Gas South is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Gas South 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.

Gas South is 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) 930-4554.

Very truly yours,

Matthew V. Toldero of
MULLEN COUGHLIN LLC

MVT/aml
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

July 15, 2022

i0941-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



[VARIABLE HEADER]

Dear Sample A. Sample:

Gas South LLC (“Gas South”) writes to notify you about a recent data incident that may involve some of your personal information. This notice provides you with information about the incident, our response, and additional steps you may take to protect your information, should you determine it is appropriate to do so.

What Happened? On February 21, 2022, Gas South discovered suspicious activity on certain Gas South computer systems. Upon identifying unusual activity on certain systems, Gas South disconnected these systems from the network and commenced an investigation. The investigation determined that an unknown actor had access to limited Gas South systems between February 13, 2022 and February 23, 2022. Because the investigation determined that there was unauthorized access to certain data, Gas South initiated a review of its systems to determine the type of information and to whom it related. Following its initial review, Gas South worked diligently to identify and populate address information for any potentially affected individuals. In an abundance of caution, we are notifying you about the event before the investigation is complete so that you may take steps to protect your information.

What Information Was Involved? The impacted Gas South systems stored the following information related to you: name, [data elements].

What We Are Doing. We take this incident very seriously. Information privacy and security are among our highest priorities, and we have security measures in place to protect information in our care. Upon discovering this incident, we investigated and responded to the incident, and are reviewing and enhancing our existing policies and procedures to reduce the likelihood of a similar future event. Gas South reported this incident to federal law enforcement and is notifying potentially affected individuals and relevant regulators as required.

Moreover, as an added precaution, Gas South is offering complimentary access to credit monitoring and identity restoration services to you for [CM Length] through Experian because your information may have been present in the systems accessed during the incident.

What You Can Do. Gas South encourages you to remain vigilant against incidents of identity theft and fraud. Be wary of unknown callers, emails or text messages, regularly review your bank and pension accounts for unusual activity and explanation of benefits and review your free credit reports for suspicious activity. You may also review and consider the information and resources outlined in the below “Steps You Can Take to Help Protect Personal Information.”

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For More Information. If you have additional questions, please call our dedicated assistance line at (833) 420-2830 toll-free Monday through Friday from 9 am – 11 pm ET, or Saturday and Sunday from 11 am – 8 pm ET (excluding major U.S. holidays). Be prepared to provide your engagement number ENGAGE#. You may write to Gas South at One Overton Park, Atlanta, GA, 30339 with any additional questions you may have.

Sincerely,

Gas South LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Restoration Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [CM Length].

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 [CM Length] 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 [CM Length] 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 October 31, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [**https://www.experianidworks.com/credit**](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) 420-2830** by **October 31, 2022**. Be prepared to provide engagement number **ENGAGE#** 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.

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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

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.

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 <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.

