

PAUL HASTINGS

1(312) 499-6016
aaroncharfoos@paulhastings.com

July 18, 2022

VIA ELECTRONIC MAIL

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

Re: Notice of Security Incident

Dear Sir or Madam:

We provide this notice on behalf of ICG Advisors ("ICG") in connection with a recent data security incident that may have impacted the personal information of two Maryland residents. This notice explains the incident and measures we have taken in response.

ICG was a victim of a phishing attack and business email compromise. On May 17, 2022, ICG received a report about an unauthorized attempt to change to wire transfer instructions. The attempt was unsuccessful. In response to this information, ICG retained a leading cybersecurity and digital forensics firm, and investigated the incident. Based on this investigation, we confirmed on June 23, 2022 that an unauthorized third party had gained access to one employee email account on May 17, 2022 and gained access to customer personal information. We immediately responded by implementing additional security measures, changed all passwords to our email system, required multi-factor authentication for email, and began an investigation

Based on the evidence reviewed in our investigation, we have determined that certain files containing two Maryland resident's driver's license number, social security number, tax ID number, date of birth, passport number, bank account information, brokerage account statements, address, and phone number were accessed or acquired during this incident.

A copy of the mailed letter provided to the potentially affected Maryland residents is attached hereto.

Please feel free to contact me with any questions, and thank you for your assistance.

Sincerely,



Aaron Charfoos
of PAUL HASTINGS LLP

Enclosures

NOTICE OF DATA BREACH

July 18, 2022

«First_Name» «Last_Name»
«Address_Line_1»
«Address_Line_1»
«CITY», «STATE» «ZIP»

Dear «First_Name» «Last_Name»,

ICG Advisors (“ICG”) recently became aware of a data security incident that may have involved some of your personal information. The incident took place on May 17, 2022. Based on our investigation, we determined on June 23, 2022 that some of your personal information may have been impacted. We have no evidence that your personal information has been misused, but we take the protection of your personal information very seriously and are contacting you out of an abundance of caution.

What Happened?

On May 17, 2022, an ICG employee was the victim of a phishing attack where an unauthorized user gained access to the employee’s mailbox. ICG became aware of the intrusion when the attacker attempted to use an entity’s information in an effort to divert a wire transfer. During the attack, the threat actor gained access to an employee’s mailbox, which may have included some personal information related to you. In response, ICG immediately launched an investigation. As a result, while we have no evidence that your personal information was improperly misused, we are contacting you out of an abundance of caution. This notice has not been delayed due to law enforcement investigation.

What Information Was Involved?

The personal information that may have been accessed by the malicious threat actor include your driver’s license number, social security number, tax ID number, date of birth, passport number, bank account information, brokerage account statements, address, and phone number. Following this incident, ICG has implemented additional security measures across its environment, including with respect to the server containing the information.

What Are We Doing?

In response to this incident, ICG immediately retained a leading cybersecurity and digital forensics firm, and launched an investigation into this incident. ICG has implemented additional security measures, changed all passwords to our email system, and required multi-factor authentication for email to further enhance our threat prevention and detection capabilities. ICG has not seen any additional activity from the threat actors after these steps were put into place.

As a precaution, we are also offering you two years of credit monitoring and identity protection with Experian at no cost to you. You can sign up for this service by using the enclosed activation code and following the steps provided below:

- Ensure that you enroll by October 31, 2022 (Your code will not work after this date)
- Visit the Experian [PRODUCT NAME] website to enroll: [WEBSITE]
- Provide your activation code: [XXX]

If you have questions about the service, need assistance with identity restoration, or would like an alternative to enrolling in Experian [PRODUCT NAME] online, please contact Experian's customer care team at [PHONE]. Please be prepared to provide **engagement number [XXX]** as proof of eligibility for the identity restoration services by Experian. Please review the additional resources that we have included with this letter for more information about how to take advantage of this additional protection.

What Can You Do?

We recommend that you remain vigilant and take steps to protect against identity theft or fraud, including by monitoring your accounts and credit report for signs of suspicious activity. In addition to enrolling in the enclosed credit monitoring and identity protection service, we also encourage you to review the resources that we have included with this letter, which provide helpful tips on safeguarding your identity.

For More Information

We are fully committed to protecting your information, and deeply regret that this incident occurred. If you have questions or concerns regarding this incident, please contact us at [PHONE] Monday-Friday from 6:00 a.m. to 8:00 p.m. PST or Saturday-Sunday from 8:00 a.m. to 5:00 p.m. PST (excluding major U.S. holidays).

Sincerely,

ICG Advisors

ADDITIONAL RESOURCES

Protecting Yourself from Identity Theft. It is always good practice to regularly review statements from your accounts for instances of fraud or identity theft, and immediately report any suspected unauthorized activity to the relevant financial institution(s). It is also a good practice to periodically monitor your credit reports, which are available to you free of charge. We recommend you remain vigilant with respect to reviewing your account statements and credit reports, and immediately report any suspicious activity or suspected identity theft to us, and to the proper law enforcement authorities, including local law enforcement, your state's attorney general, and/or the Federal Trade Commission ("FTC").

Annual Credit Report. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348- 5281. You may also obtain additional copies of your credit report by contacting one or more of the three national credit reporting agencies. The credit reporting agency may charge a fee. When you receive your credit reports, if you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Fraud Alerts. You may place a fraud alert in your credit file by contacting one of the three nationwide credit reporting agencies listed below. A fraud alert tells creditors to follow certain procedures, including contacting you before the creditor opens any new accounts or makes certain changes to your existing accounts. For those reasons, place a fraud alert can protect you, but may also delay you when you seek to obtain credit.

Security Freezes. You have the ability to place a free security freeze on your credit report free of charge. A security freeze will prevent a credit reporting agency from releasing information in your credit report without your express authorization. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. To place a security freeze, you may be required to provide the credit reporting agency certain identifying information, including your full name; Social Security number; date of birth; current and previous addresses; a copy of your state-issued identification card; and a recent utility bill, bank statement, or insurance statement.

Contact Information for Credit Reporting Agencies. You may contact the three nationwide credit reporting agencies about security freezes, fraud alerts, steps for avoiding identity theft, and other related topics using the contact information below:

Equifax P.O. Box 740241 Atlanta, GA 30374 1-800-685-1111 www.equifax.com	Experian P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	TransUnion P.O. Box 1000 Chester, PA 19022 1-800-888-4213 www.transunion.com
--	---	---

Important Contacts. For more information about fraud alerts, security freezes, and steps for avoiding identity theft, or if you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you can contact the FTC at: FTC Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington D.C. 20580, by phone at 1-877-438-4338, or by visiting consumer.ftc.gov.

You should also report incidents of suspected identity theft to local law enforcement and the Attorney General's office in your home state. Your state's Attorney General, including those for the states listed below, may also provide helpful information about fraud alerts, security freezes, and steps for avoiding identity theft:

**Office of the
Maryland Attorney
General**

200 St. Paul Place
Baltimore, MD
21202
www.marylandattorneygeneral.gov
1-888-743-0023

**North Carolina
Office of the
Attorney General**

Mail Service Center
9001
Raleigh, NC 27699
www.ncdoj.gov
1-877-566-7226

**Oregon Office of
the Attorney
General**

1162 Court St. NE
Salem, OR 97301
www.doj.state.or.us/
1-877-877-9392

Additional Details Regarding your [PRODUCT] Membership

[Experian to insert]