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August 11, 2022

VIA ELECTRONIC MAIL

Idtheft@oag.state.md.us

Identity Theft Unit

200 St. Paul Place, 25th Floor

Baltimore, MD 21202

Re: Data Incident Notification¹

To Whom It May Concern:

Our client, Scott and Shuman, P.A. of 33292 Coastal Highway, Suite 3 Bethany Beach, DE 19930-3703 (“S&S”), experienced a data incident (“Incident”) that may have involved the personal information of Maryland residents.

On February 23, 2022, S&S learned it was the victim of a business email compromise. Immediately upon learning of the Incident, S&S engaged an expert cybersecurity forensic investigation team to review the nature and scope of the Incident. The investigation concluded that unauthorized actors accessed and synced one S&S employee email account. S&S engaged a vendor to programmatically data mine the affected email account to determine whether it contained personally identifiable information (“PII”). The programmatic search identified emails potentially containing PII and S&S proceeded to conduct a manual review to confirm the presence of PII and identify potentially affected individuals. S&S recently completed its manual review and has determined the PII of three hundred thirty-three (333) residents of Maryland were involved. However, S&S is continuing to review the results of the manual review and will update this notice should the number of Maryland residents change.

The PII for the Maryland residents included some or all of the following name, address, date of birth, driver’s license, financial account number/credit card number, and Social Security Number and in extremely limited circumstances medical information/health insurance numbers. A draft copy of the notification letter is attached.

¹ Please note that by providing this letter Scott & Shuman is not agreeing to the jurisdiction of State of Maryland or waiving its right to challenge jurisdiction in any subsequent actions

In addition to continuing to monitor this situation, S&S is reviewing its data security policies and procedures and making improvements, as needed, to minimize the risk of future incidents.

If you require any additional information on this matter, please let me know.

Very truly yours,

/s/ Joseph J. Lazzarotti

Joseph J. Lazzarotti

Mary Costigan

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JJL/MTC:mp

<<Letterhead>>

<<Date>>

<<Recipient's Name>>

<<Address>>

Re: Notice of Data Breach

Dear <<Name>>:

We value and respect the privacy of your information, which is why we are writing to inform you we recently learned that some of your personal information may have been subject to unauthorized access or acquisition as the result of a cyberattack (the “Incident”). While we are not aware of any misuse of your information, we are providing this notice to inform you of the Incident and to call your attention to steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened?

On February 23, 2022, we discovered your personal information may have been accessible to an unauthorized actor(s) as a result of the Incident. Based on the investigation, it appears the Incident occurred between February 10 and February 22.

What Information Was Involved?

The following types of data may have included personal information such as your name and Social Security number, address, date of birth, Driver’s License number, financial account number/credit card/debit card number and in extremely limited circumstances, medical information/health insurance numbers.

What We Are Doing.

Scott and Shuman P.A. takes this Incident and the security of your personal information very seriously. Upon learning of this incident, we launched an in-depth investigation to determine the scope of the Incident and identify those potentially affected. This included working with our information technology team, the applicable financial institutions, and third-party forensic experts in an effort to ensure the Incident did not result in any additional exposure to personal information and taking steps to confirm the integrity of our systems. We also worked with third-party experts to determine what information may have been at risk.

As an added precaution, we are offering complimentary access to *myTrueIdentity*, an online credit monitoring service. Once you are enrolled, you will be able to obtain <<12 or 24 months>> of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion®, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.) If you wish to receive these services, activation instructions are below.

What You Can Do.

The attached sheet describes steps you can take to protect your identity and personal information.

To enroll in *myTrueIdentity*, 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 << **Insert static 6-digit Telephone Pass Code** >> 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 <<**Insert 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.

If you have questions about your *myTrueIdentity* online credit monitoring benefits, need help with your online enrollment, or need help accessing your credit report, or passing identity verification, please contact the *myTrueIdentity* Customer Service Team toll-free at: 1-844-787-4607, Monday-Friday: 8am- 9pm, Saturday-Sunday: 8am-5pm Eastern time.

For More Information.

We apologize for the inconvenience this may cause. We are committed to maintaining the security and privacy of personal information. We want you to be assured that we are taking steps to minimize the chances of a similar occurrence happening again. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at <<phone number>>, Monday through Friday from <<times>>.

Sincerely,

Scott and Shuman, P.A.

K. William Scott
President

ADDITIONAL RECOMMENDED STEPS

We recommend you remain vigilant and consider taking the following steps to avoid identity theft, obtain additional information, and protect your personal information:

- Order Your Free Credit Report at www.annualcreditreport.com, call toll-free at 877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's website at www.ftc.gov. When you receive your credit report, review the entire report carefully. Look for any inaccuracies and/or accounts you don't recognize and notify the credit bureaus as soon as possible in the event there are any. You have rights under the federal Fair Credit Reporting Act ("FCRA"). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information.
- Place a Fraud Alert on Your Credit File. A fraud alert helps protect you against an identity thief opening new credit in your name. With this alert, when a merchant checks your credit history when you apply for credit, the merchant will receive a notice that you may be a victim of identity theft and to take steps to verify your identity. You also have the right to place a "security freeze" on your credit file. A security freeze generally will prevent creditors from accessing your credit file at the three nationwide credit bureaus without your consent. You can place a fraud alert or request a security freeze by contacting the credit bureaus. The credit bureaus may require that you provide proper identification prior to honoring your request.

Equifax	P.O. Box 740241 Atlanta, GA 30374	1-800-525-6285	www.equifax.com
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Experian	P.O. Box 9532 Allen, TX 75013	1-888-397-3742	www.experian.com
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TransUnion	P.O. Box 2000 Chester, PA 19016	1-800-680-7289	www.transunion.com
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- Place a security freeze on your credit. If you are concerned about becoming a victim of security fraud or identity theft, a security freeze might be right for you. Placing a freeze on your credit report will prevent lenders and others from accessing your credit report, which will prevent them from extending credit. With a security freeze in place, you will be required to take special steps when you wish to apply for any type of credit. This process is also accessed through each of the credit reporting companies and there is no charge.

To place a security freeze on your credit report, you must send a written request to each of the three major consumer reporting agencies by regular, certified or overnight mail at the addresses below or, if available, comply with the consumer reporting agencies' online security freeze request procedures:

Equifax Security Freeze
1-888-298-0045
www.equifax.com
P.O. Box 105788
Atlanta, GA 30348

Experian Security Freeze
1-888-397-3742
www.experian.com
P.O. Box 9554
Allen, TX 75013

Trans Union Security Freeze
1-888-909-8872
www.transunion.com
P.O. Box 160
Woodlyn, PA 19094

In order to request a security freeze, you may need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security Number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.); and
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail or, if available, comply with the consumer reporting agencies' online procedures for lifting a security freeze, and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail or, if available, comply with the consumer reporting agencies' online procedures for removing a security freeze, and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

- Remove your name from mailing lists of pre-approved offers of credit for approximately six months.
- If you aren't already doing so, please pay close attention to all bills and credit-card charges you receive for items you did not contract for or purchase. Review all of your bank account statements frequently for checks, purchases or deductions not made by you. Note that even if you do not find suspicious activity initially, you should continue to check this information periodically since identity thieves sometimes hold on to stolen personal information before using it.
- The Federal Trade Commission ("FTC") offers consumer assistance and educational materials relating to identity theft, privacy issues, and how to avoid identity theft. You may also obtain information about fraud alerts and security freezes from the consumer reporting agencies, your state Attorney General, and the FTC.

You can learn more about how to protect yourself from becoming an identity theft victim (including how to place a fraud alert or security freeze) by contacting the FTC at 1-877-IDTHEFT (1-877-438-4338), or www.ftc.gov/idtheft. The mailing address for the FTC is: Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW Washington, DC 20580.

- If you detect any incident of identity theft or fraud, promptly report the incident to your local law enforcement authorities, your state Attorney General, and/or the Federal Trade Commission ("FTC").
- *For District of Columbia Residents:* You can obtain additional information about steps to take to avoid identity theft from the Office of the Attorney General for the District of Columbia, 441 4th Street, NW, Washington, DC 20001, 202-727-3400, www.oag.dc.gov.
- *For Maryland Residents:* You can obtain information about steps you can take to help prevent identity theft from the Maryland Attorney General at: 200 St. Paul Place, Baltimore, MD 21202, 888-743-0023, www.oag.state.md.us.
- *For New Mexico Residents:* You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf> or www.ftc.gov. In addition, New Mexico consumers may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act. For more information about New Mexico consumers obtaining a security freeze, go to <http://consumersunion.org/pdf/security/securityNM.pdf>
- *For New York Residents:* You may also contact the following state agencies for information regarding security breach response and identity theft prevention and protection information: 1) New York Attorney General, (212) 416-8433 or <https://ag.ny.gov/internet/resource-center>; or 2) NYS Department of State's Division of Consumer Protection, (800) 697-1220 or <https://dos.ny.gov/consumer-protection>.
- *For North Carolina Residents:* You can obtain information about steps you can take to help prevent identity theft from the North Carolina Attorney General at: 9001 Mail Service Center, Raleigh, NC 27699, 1-877-566-7226, www.ncdoj.gov.



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MARY T. COSTIGAN
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January 9, 2023

VIA ELECTRONIC MAIL

Idtheft@oag.state.md.us

Identity Theft Unit
200 St. Paul Place, 25th Floor
Baltimore, MD 21202

Re: Data Incident Notification¹

To Whom It May Concern:

On or about August 11, 2022, we submitted a notice of a data incident to your office on behalf of our client, Scott and Shuman, P.A. (“S&S”) of 33292 Coastal Highway, Suite 3 Bethany Beach, DE 19930-3703 (attached). This letter serves to supplement that notice with respect to the number of Maryland residents potentially impacted by the incident.

As we noted in our earlier letter, S&S would continue to manually review files identified by a programmatic search in an effort determine whether additional individuals may have been impacted by the incident. As a result of that further review, S&S identified seven (7) additional Maryland residents. Notification letters were sent to those individuals on or about August 29, 2022¹.

If you require any additional information on this matter, please let me know.

Very truly yours,

/s/ Mary T. Costigan
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mary.costigan@jacksonlewis.com
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¹ Please note that by providing this letter Scott & Shuman is not agreeing to the jurisdiction of State of Maryland or waiving its right to challenge jurisdiction in any subsequent actions future incidents.