



MULLEN
COUGHLIN^{LLC}
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August 12, 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 Barnes & Thornburg LLP (“Barnes & Thornburg”) located at 11 South Meridian Street Indianapolis, IN 46204-3535, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one (1) Maryland resident. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Barnes & Thornburg 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

Barnes & Thornburg became aware of suspicious activity in its email system. Upon learning of this suspicious activity, Barnes & Thornburg promptly engaged its incident response team and began working with law enforcement and third-party cybersecurity forensic specialists to investigate the issues and determine the nature and scope of the activity. Through this investigation, Barnes & Thornburg discovered potential unauthorized access to certain emails dated between May 15 and June 14, 2021. Barnes & Thornburg then worked diligently with forensic specialists to identify and review the impacted data, and to confirm any personal information that may have been involved. This internal review of the potentially impacted population was completed on June 27, 2022. Barnes & Thornburg is notifying individuals of this incident because some of their information may have been impacted. The information that could have been subject to unauthorized access includes name, Social Security number, passport number, and financial account information.

Notice to Maryland Resident

On or about August 12, 2022, Barnes & Thornburg provided written notice of this incident to one (1) Maryland resident. 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, Barnes & Thornburg moved quickly to investigate and respond to the incident, assess the security of Barnes & Thornburg systems, and identify potentially affected individuals. Further, Barnes & Thornburg worked with federal law enforcement regarding the event. Barnes & Thornburg is also working to implement additional safeguards and training to its employees. Barnes & Thornburg 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, Barnes & Thornburg is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud. Barnes & Thornburg 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.

Barnes & Thornburg 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) 930-4784.

Very truly yours,

Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB:mf1
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

August 12, 2022

1 1 91 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



NOTICE OF [EXTRA1]

Dear Sample A. Sample:

Barnes & Thornburg LLP (“Barnes & Thornburg”) writes to notify you of a recent event that may impact the privacy 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.

What Happened? Barnes & Thornburg became aware of suspicious activity in its email system on or about September 16, 2021. Upon learning of this suspicious activity, Barnes & Thornburg promptly engaged our incident response team and began working with law enforcement and third-party cybersecurity forensic specialists to investigate the issues and determine the nature and scope of the activity. Through this investigation and with the assistance from law enforcement, we discovered potential unauthorized access to certain emails dated between May 15 and June 14, 2021. We have been working diligently with our forensic specialists to identify and review impacted data, and to confirm any personal information that may have been impacted. We recently concluded this internal review of the potentially impacted population, and are now writing to provide you notice of this event and its impact on your data.

What Information Was Involved? Although we are currently unaware of any misuse of your information, we are nonetheless providing you with information about the incident. The information that may have been impacted by this includes your name and [Extra2].

What We Are Doing. Barnes & Thornburg takes this incident and security of your information seriously. Upon learning of this incident, we moved quickly to investigate and respond with the assistance of third-party forensic specialists. This investigation and response included confirming the security of our systems, reviewing the contents of relevant data for personal information, and notifying impacted individuals associated with that personal information. As part of our ongoing commitment to the privacy and security of personal information in our care, we are reviewing our policies procedures and processes related to the storage and access of personal information, and additional workforce training is being conducted. We have been in communications with the appropriate authorities and will notify applicable state regulators consistent with legal requirements.

As an added precaution, we are also offering [Extra3] months of complimentary access to credit monitoring services through Experian. Individuals who wish to receive these services must enroll by following the attached enrollment instructions.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. You can review the enclosed Steps You Can Take to Help Protect Your Personal Information to learn helpful tips on steps you can take to protect against possible misuse should you feel it appropriate to do so.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. If you have additional questions, or need assistance, please call us at (833) 420-2832, Monday through Friday from 6a.m. to 8p.m. PST; Saturday/Sunday from 8a.m. to 5p.m. PST (excluding major US holidays). Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian. You can also write to us at 11 South Meridian Street, Indianapolis, IN 46204.

Sincerely,
Barnes & Thornburg LLP

Steps You Can Take to Help Protect Your Personal Information

Enroll in Credit and Identity Monitoring

To help protect your identity, we are offering a complimentary [Extra3]-month membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and 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>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 420-2832 by **October 31, 2022**. Be prepared to provide engagement number [**Engagement Number**] as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your [Extra3]-month 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 agents 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.
- **Up to \$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (833) 420-2832. 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 (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 this Identity Restoration support is available to you for [Extra3] months 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. You will also find self-help tips and information about identity protection at this site.

* 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.

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
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

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 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.