

August 17, 2022

VIA ELECTRONIC MAIL (IDTHEFT@OAG.STATE.MD.US)

Office of the Attorney General
Security Breach Notification
200 St. Paul Place, 25th Floor
Baltimore, Maryland 21202

Re: Notification of Data Security Incident
Our File No: 1250772

To Whom It May Concern:

Our client, Otis & Bedingfield, LLC (“Otis & Bedingfield”), a real estate law and business law services firm in Northern Colorado, understands the importance of protecting the personal information provided by its clients and is making this notification to your Office in accordance with applicable law following a recent data security incident.

On October 4, 2021, Otis & Bedingfield became aware of a data security incident that impacted portions of its server infrastructure. Otis & Bedingfield immediately undertook efforts to restore its servers, and backups and other information maintained by Otis & Bedingfield were used to enable near seamless restoration of security and services. Otis & Bedingfield also undertook additional affirmative steps to safeguard the security of data maintained on its systems. Otis & Bedingfield simultaneously retained a forensic investigation firm to determine the nature of the security compromise and identify any individuals whose information may have been compromised.

The forensic investigation determined that first access to Otis & Bedingfield’s systems occurred on approximately September 13, 2021 through October 3, 2021. The forensic investigation also identified a limited number of files that may have been accessed or acquired in connection with the incident. In continuing its thorough investigation, Otis & Bedingfield undertook a comprehensive manual review process to review the entirety of these files and identify the specific individuals with personal information contained therein. This comprehensive manual review process is ongoing.

In an abundance of caution, Otis & Bedingfield is providing this notification to all individuals with personal information contained within the files that may have been accessed and/or acquired in connection with the incident. Otis & Bedingfield has obtained confirmation to the best of its ability that the information is no longer in possession of the third party(ies) associated

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with this incident, and it is entirely possible that an individual's specific personal information was *not compromised* as a result of the incident.

Nonetheless, as stated above, Otis & Bedingfield has provided notification of the incident in an abundance of caution to all potentially impacted individuals *via* written notice beginning on August 17, 2022, including three (3) Maryland residents. A sample copy of the notification letter to the Maryland residents is attached. As noted in the attachment, Otis & Bedingfield has included in the notification an offer to provide complimentary credit monitoring and identity theft protection services to the potentially impacted Maryland residents. Notification has also been provided to the three (3) major credit reporting agencies.

As stated above, following the data security incident, Otis & Bedingfield immediately undertook efforts to restore its servers, and also undertook additional affirmative steps to safeguard the security of data maintained on its systems. Otis & Bedingfield retained a forensic investigation firm to thoroughly investigate the incident. Please be advised that Otis & Bedingfield is continuing to work closely with leading security experts to identify and implement measures to further strengthen the security of their systems to help prevent this from happening in the future.

Should you have any questions or require additional information, please do not hesitate to contact me.

Best regards,

GORDON REES SCULLY MANSUKHANI, LLP

/s/ Joseph Salvo

Joseph Salvo, Esq.

Enclosures



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

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NOTICE OF DATA BREACH

Dear <<Name 1>>:

Otis & Bedingfield, LLC (“Otis & Bedingfield”) values your business and understands the importance of protecting your information. Otis & Bedingfield is sending you this notice to inform you that it recently identified and addressed a security incident that may have involved your personal information. This notice describes the incident, outlines the measures that Otis & Bedingfield has taken in response, and advises you on steps you can take to further protect your information.

What Happened? On October 4, 2021, Otis & Bedingfield became aware of a data security incident that impacted portions of its server infrastructure. Otis & Bedingfield immediately undertook efforts to restore its servers, and backups and other information maintained by Otis & Bedingfield were used to enable near seamless restoration of security and services. Otis & Bedingfield also undertook additional affirmative steps to safeguard the security of data maintained on its systems. Otis & Bedingfield simultaneously retained a forensic investigation firm to determine the nature of the security compromise and identify any individuals whose information may have been compromised.

What Information Was Involved? The forensic investigation determined that first access to Otis & Bedingfield’s systems occurred on approximately September 13, 2021 through October 3, 2021. The forensic investigation also identified a limited number of files that may have been accessed or acquired in connection with the incident. In continuing its thorough investigation, Otis & Bedingfield undertook a comprehensive manual review process to review the entirety of these files and identify the specific individuals with personal information contained therein. This comprehensive manual review process is ongoing.

In an abundance of caution, Otis & Bedingfield is providing this notification to you as your personal information may have been accessed and/or acquired in connection with the incident, specifically <<Breach Elements>>. Otis & Bedingfield has obtained confirmation to the best of its ability that the information is no longer in possession of the third party(ies) associated with this incident, and it is entirely possible that your specific personal information *was not compromised* as a result of the incident.

What We Are Doing. As stated above, following the data security incident, Otis & Bedingfield immediately undertook efforts to restore its servers, and also undertook additional affirmative steps to safeguard the security of data maintained on its systems. Otis & Bedingfield retained a forensic investigation firm to thoroughly investigate the incident. Please be advised that Otis & Bedingfield is continuing to work closely with leading security experts to identify and implement measures to further strengthen the security of their systems to help prevent this from happening in the future.

FREE CREDIT MONITORING/INSURANCE: Additionally, we are offering you a free <<12 or 24 >>-month membership to Equifax Credit Watch Gold credit monitoring service. 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. **This product also includes various features such as up to \$1,000,000 in identity theft insurance with no deductible, subject to policy limitations and exclusions. Equifax Credit Watch Gold is completely free to you and enrolling in this program will not hurt your credit score.** For more information on identity theft protection and Equifax Credit Watch Gold, including instructions on how to activate your complimentary <<12 or 24 >>-month membership, please see the additional information attached to this letter. ***TO TAKE ADVANTAGE OF THE FREE CREDIT MONITORING OFFER, YOU MUST ENROLL BY NOVEMBER 30, 2022.***

What You Can Do. We are aware of how important your personal information is to you. We encourage you to protect yourself from potential harm associated with this incident by enrolling in the credit monitoring service, closely monitoring all mail, email, or other contact from individuals not known to you personally, and to avoid answering questions or providing additional information to such unknown individuals. We also remind you to remain vigilant for incidents of fraud or identity theft by reviewing account statements, explanation of benefits statements, and credit reports for unauthorized activity, and to report any such activity or any suspicious contact whatsoever to law enforcement if warranted.

For More Information. For further information on steps you can take to prevent against possible fraud or identity theft, please see the attachments to this letter. Otis & Bedingfield understands the importance of protecting your personal information, and deeply regrets any concern this may have caused to you. **Should you have any questions and would like further information regarding the information contained in this letter, please do not hesitate to contact 877-561-3268 Monday through Friday, between 9:00 AM and 9:00 PM Eastern time.**

Sincerely,

Tim Brynteson
Manager, Otis & Bedingfield, LLC

Attachment 1: Protecting Yourself

We remind you to remain vigilant for incidents of fraud or identity theft by reviewing account statements and credit reports for unauthorized activity. **Residents of the United States are entitled to one free credit report annually from each of the three major credit reporting agencies.** To order your free credit reports, visit www.annualcreditreport.com or call toll-free (877) 322-8228. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission.

You may want to consider placing a fraud alert on your credit report. There are two types of 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.

- **Initial Alert:** You may ask that an initial alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. A fraud alert does not impact your ability to get a loan or credit, but rather alerts a business that your personal information may have been compromised and requires the business to verify your identity before issuing you credit. Although this may cause some delay if you are applying for credit, it may protect against someone else obtaining credit in your name. An initial fraud alert stays on your credit report for at least 90 days.
- **Extended Alert:** 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. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies. The agency that you contacted must notify the other two agencies.

Additionally, you have the right to put a **credit freeze**, also known as a security freeze, on your credit file, free of charge, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit. There is no fee to place or lift a security freeze. However, unlike a fraud alert, you must separately place a security freeze on your credit file at each of the three national credit reporting agencies. 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.

Below are the toll-free numbers and addresses for the three largest credit reporting agencies:

Equifax
P.O. Box 74021
Atlanta, GA 30374
1-800-685-1111
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Below is the toll-free number, address and website address for the Federal Trade Commission, which you may contact to obtain further information on how to protect yourself from identity theft and how to repair identity theft:

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

For residents of District of Columbia, Maryland, Rhode Island, and North Carolina: You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

Rhode Island Office of the Attorney General
Consumer Protection
150 South Main Street
Providence, RI 02903
1-401-274-4400
www.riag.ri.gov

District of Columbia Office of the Attorney General
Office of Consumer Protection
400 6th Street, NW
Washington, DC 20001
1-202-442-9828
www.oag.dc.gov

North Carolina Office of the Attorney General
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

For residents of Massachusetts and Rhode Island: It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

FAIR CREDIT REPORTING ACT. You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (<https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC's list includes the following FCRA rights: (1) To receive a copy of your credit report, which must contain all the information in your file at the time of your request; (2) To receive a free copy of your credit report, at your request, once every 12 months from each of the nationwide credit reporting companies – Equifax, Experian, and TransUnion; (3) To receive a free credit report if a company takes adverse action against you (e.g. denying your application for credit, insurance, or employment), and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You are also entitled to one free report a year if you're unemployed and plan to look for a job within 60 days; if you are on welfare; or if your report is inaccurate because of fraud, including identity theft; (4) To ask for a credit score; (5) To dispute incomplete or inaccurate information; (6) To obtain corrections to your report or delete inaccurate, incomplete, or unverifiable information; (7) Consumer reporting agencies may not report outdated negative information; (8) To restrict access to your file and to require consent from you for reports to be provided to employer; (9) To limit "prescreened" offers of credit and insurance you receive based on information in your credit report; and (10) To seek damages from violators. Note - Identity theft victims and active duty military personnel have additional rights.



<<FIRST NAME> <LAST NAME>>
Enter your Activation Code: <<ACTIVATION CODE>>
Enrollment Deadline: <<DEADLINE MMMM DD, YYYY>>

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product.

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate.

Enter your unique Activation Code of <<ACTIVATION CODE>> then click “Submit” and follow these 4 steps:

1. **Register:**
Complete the form with your contact information and click “Continue”.
If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.
Once you have successfully signed in, you will skip to the Checkout Page in Step 4.
2. **Create Account:**
Enter your email address, create a password, and accept the terms of use.
3. **Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click ‘Sign Me Up’ to finish enrolling.
You’re done!
The confirmation page shows your completed enrollment.
Click “View My Product” to access the product features.

¹WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers’ personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers’ personal information is at risk of being traded. ²The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. ³Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer’s identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com. ⁴The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.