



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Kevin M. Mekler
Office: (267) 930-2190
Fax: (267) 930-4771
Email: Kmekler@mullen.law

3001 N. Rocky Point Drive East, Suite 200
Tampa, FL 33607

September 14, 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 M.C. Dean, Inc. ("M.C. Dean") located at 1765 Greensboro Station Place, Tysons, VA 22102, and are writing to notify your office of an incident that may affect the security of certain personal information relating to seven thousand two hundred eighteen (7,218) Maryland residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, M.C. Dean 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 or about June 2, 2022, M.C. Dean discovered suspicious activity occurring within its environment. M.C. Dean promptly took steps to secure its systems and, with the assistance of third-party cybersecurity specialists, conducted an investigation to confirm the nature and scope of the incident. The investigation determined that someone without authorization accessed M.C. Dean systems between December 24, 2021 and June 2, 2022. M.C. Dean thoroughly reviewed the files to determine the exact information that may have been accessed or acquired by the unauthorized actor and concluded its internal review on or about August 10, 2022. The information that could have been subject to unauthorized access includes name, Social Security number, driver's license number, medical information, and health insurance information.

Notice to Maryland Residents

On or about September 14, 2022, M.C. Dean provided written notice of this incident to seven thousand two hundred eighteen (7,218) 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 incident, M.C. Dean moved quickly to investigate and respond to the incident, assess the security of M.C. Dean systems, and identify potentially affected individuals. Further, M.C. Dean notified the FBI, DHS/CISA and DoD, and continues to cooperate fully with federal law enforcement to investigate this matter. Further, as part of M.C. Dean's ongoing commitment to the privacy of information in our care, M.C. Dean implemented additional technical security measures designed to mitigate recurrence of this type of incident and is reviewing and enhancing existing data privacy policies and procedures. M.C. Dean is providing access to credit monitoring services for twenty-four (24) months, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, M.C. Dean is providing impacted individuals with guidance on how to better protect against identity theft and fraud. M.C. Dean is providing individuals with information on how to place a fraud alert and a credit freeze on their 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.

M.C. Dean is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact us at (267) 930-2190.

Very truly yours,

Kevin M. Mekler of
MULLEN COUGHLIN LLC

KMM/emw
Enclosure

EXHIBIT A



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

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

<<VARIABLE HEADER>>

Dear <<Name 1>>:

M.C. Dean, Inc. is writing to notify you of a recent incident that may affect the security of some of your information. This notice provides you with information about the incident, our response, and steps you may take to better protect your information, should you feel it is appropriate to do so.

What Happened? On June 2, 2022, we discovered suspicious activity occurring within our environment. We promptly took steps to secure our systems and, with the assistance of third-party cybersecurity specialists, conducted an investigation to confirm the nature and scope of the incident. The investigation determined that someone without authorization accessed our systems between December 24, 2021 and June 2, 2022. We thoroughly reviewed the files to determine the exact information that may have been accessed or acquired by the unauthorized actor and concluded our internal review on or about August 10, 2022.

What Information Was Involved? Our investigation determined that your name and the following information relating to you was present in files stored on our systems during the period of unauthorized access: <<Breached Elements>>. We have no evidence of any actual or attempted identity theft or fraud occurring as a result of the incident.

What We Are Doing. We take this incident and the security of personal information in our care very seriously. In response to the incident, we promptly took steps to secure the impacted systems, and conducted a diligent investigation aided by third-party cybersecurity specialists, to confirm the full nature and scope of the incident. We also notified the FBI, DHS/CISA and DoD, and continue fully cooperating with federal law enforcement to investigate this matter. Further, as part of our ongoing commitment to the privacy of information in our care, we implemented additional technical security measures designed to mitigate recurrence of this type of incident and are reviewing and enhancing existing data privacy policies and procedures.

As an added precaution we are offering you access to twenty-four (24) months of credit monitoring and identity theft protection services through Equifax, at no cost to you. Although we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself using the enrollment instructions included within the enclosure to this letter.

What You Can Do. You can find out more about how to safeguard your information in the enclosed *Steps You Can Take to Protect Personal Information*. There, you will find additional information about the complimentary credit monitoring and identity restoration services we are offering and how to enroll.

For More Information. We understand that you may have questions that are not addressed in this letter. If you have additional questions or concerns, please call our dedicated assistance line at 844-615-1545, which is available Monday through Friday, 9 a.m. to 9 p.m. Eastern Time (excluding U.S. holidays). You may also write M.C. Dean, Inc. at 1765 Greensboro Station Place, Tysons, VA 22102.

We take this incident very seriously and sincerely regret any inconvenience or concern it may cause you.

Sincerely,

J. Michael Littlejohn

J. Michael Littlejohn
Senior Vice President & General Counsel
M.C. Dean, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

Enter your Activation Code: <<ACTIVATION CODE>>

Enrollment Deadline: <<Enrollment Deadline>>

Equifax Complete™ Premier

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

Key Features

- Annual access to your 3-bureau credit report and VantageScore¹ credit scores
- Daily access to your Equifax credit report and 1-bureau VantageScore credit score
- 3-bureau credit monitoring² with email notifications of key changes to your credit reports
- WebScan notifications³ 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 alerts⁴, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock⁵
- 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 theft⁶.
- Lost Wallet Assistance if your wallet is lost or stolen, and one-stop assistance in canceling and reissuing credit, debit and personal identification cards.

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.

¹The credit scores provided are based on the VantageScore® 3.0 model. For three-bureau VantageScore credit scores, data from Equifax®, Experian®, and TransUnion® are used respectively. Any one-bureau VantageScore uses Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.

²Credit monitoring from Experian and TransUnion will take several days to begin.

³WebScan 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.

⁴The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

⁵Locking 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.

⁶The 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.

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 one-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 credit 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 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 violators. 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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are <<RI Count>> Rhode Island residents impacted by this incident.