

October 11, 2022

Tawana B. Johnson
470-419-6653 (direct)
470-419-6650 (main)
Tawana.Johnson@WilsonElser.com

Via electronic-mail: Idtheft@oag.state.md.us

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

Re:	Our Client	:	Creative Capital Management Investments, LLC
	Matter	:	Data Security Incident on August 15, 2022
	Wilson Elser File #	:	16516.01948

Dear Attorney General Frosh:

We represent Creative Capital Management Investments, LLC (“CCMI”), headquartered in San Diego, California, with respect to a potential data security incident described in more detail below. CCMI takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of Maryland residents being notified, what information has been compromised, and the steps that CCMI is taking to restore the integrity of the system. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

On August 15, 2022, CCMI detected that it was a target of a cybersecurity attack. This incident may have resulted in the exposure of personal information. Although we have found no evidence that any information has been specifically accessed for misuse, it is possible that the potentially impacted individuals’ name, mailing address, date of birth, social security number, driver’s license number, and/or financial account numbers could have been exposed as a result of this attack.

As of this writing, CCMI has not received any reports of related identity theft since the date of the incident (August 15, 2022 to present).

3348 Peachtree Road N.E., Suite 1400 • Atlanta, Georgia 30326 • p 470.419.6650 • f 470.419.6651

Alabama • Albany • Atlanta • Austin • Baltimore • Beaumont • Boston • Chicago • Dallas • Denver • Edwardsville • Garden City • Hartford • Houston • Indiana •
Kentucky • Las Vegas • London • Los Angeles • Miami • Michigan • Milwaukee • Mississippi • Missouri • Nashville • New Jersey • New Orleans • New York • Orlando •
Philadelphia • Phoenix • San Diego • San Francisco • Sarasota • Seattle • Stamford • Virginia • Washington, DC • Wellington • White Plains •

wilsonelser.com

2. Number of Maryland Residents Affected

A total of twelve (12) residents of Maryland were potentially affected by this security incident. Notification letters to these individuals will be mailed on October 11, 2022, by first class mail. Sample copies of the notification letters are included with this letter.

3. Steps Taken

Immediately upon learning of this incident, CCMI contacted a reputable third-party forensic team to assist with its investigation. Since then, CCMI has been working with law enforcement to help respond to this incident, along with cybersecurity experts to review all policies and procedures relating to the security of CCMI's systems.

Although CCMI is not aware of any evidence of misuse of personal information, CCMI extended to all potentially impacted individuals an offer for free credit monitoring and identity theft protection through Cyberscout. This service will include 12 months of credit monitoring, along with a fully managed identity theft recovery service, should the need arise.

4. Contact Information

CCMI remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Tawana.Johnson@WilsonElser.com or 470-419-6653.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Tawana Johnson, Esq.

Copy: Robert Walker, Esq.
(Wilson Elser LLP)

Enclosure: *Sample Notification Letters*

Creative Capital Management Investments, LLC
c/o Cyberscout
P.O. Box 3923
Syracuse, NY 13220



October 11, 2022

Via First-Class Mail

Notice of Data Incident



Creative Capital Management Investments, LLC ("CCMI") provides financial planning and wealth management services to clients throughout the United States. We are writing to inform you of a data security incident that may have exposed your personal information. We take the security of your personal information very seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved:

On or about August 15, 2022, CCMI detected that it was the target of a cybersecurity attack. An unauthorized third party attempted to infiltrate CCMI's computer network and demand a ransom payment. Upon detecting this incident, we moved quickly to secure our network environment and launched a thorough investigation. The investigation was performed with the help of independent IT security and forensic investigators to determine the scope and extent of the potential unauthorized access to our systems and any personal information.

Although we have found no evidence that your information has been specifically accessed for misuse, it is possible that your name, mailing address, date of birth, social security number, driver's license number, and/or financial account numbers, to the extent that such may have existed on the network, could have been exposed.

As of this writing, CCMI has not received any reports of related identity theft since the date of the incident (August 15, 2022 to present). We have taken all efforts possible to mitigate any further exposure of your personal information and related identity theft.

What We Are Doing:

We take the security of all information in our control very seriously. Given this, we have taken and are continuing to take steps to prevent a similar event from occurring in the future by implementing additional safeguards and enhanced security measures to better protect the privacy and security of information in our systems. We have also reviewed and taken steps to enhance our policies and

procedures relating to the security of our systems and servers, as well as our information life cycle management.

What You Can Do:

CCMI is providing you with access to **Single Bureau Credit Monitoring** services at no charge. These services provide you with alerts for **twelve months** from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event that you become a victim of fraud. These services will be provided by Cyberscout through Identity Force, a company specializing in fraud assistance and remediation services.

To enroll in Credit Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/ccmille> and follow the instructions provided. When prompted please provide the following unique code to receive services: **2ZY6CU7CZJ**. In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter.

The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering.

Enclosed hereto you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

For More Information:

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call 1-800-405-6108 Monday through Friday, during the hours of 8:00 am to 8:00 pm Eastern Standard Time (excluding U.S. national holidays). Cyberscout representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

CCMI values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

Matt Showley

Matt Showley
Partner

Brian Matter

Brian Matter
Partner

Kim Benson

Kim Benson
Partner

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-888-909-8872 www.transunion.com/credit-freeze
---	---	--

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 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 agencies 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For New York residents, the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.

Creative Capital Management Investments, LLC
c/o Cyberscout
P.O. Box 3923
Syracuse, NY 13220



October 11, 2022

Via First-Class Mail

Notice of Data Incident

Dear [REDACTED],

Creative Capital Management Investments, LLC ("CCMI") provides financial planning and wealth management services to clients throughout the United States. We are writing to inform you of a data security incident that may have exposed your personal information. CCMI retained your personal information for legitimate business purposes related to services provided to one of CCMI's clients who identified you as a trustee, executor, beneficiary, spouse, and/or dependent. We take the security of your personal information very seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved:

On or about August 15, 2022, CCMI detected that it was the target of a cybersecurity attack. An unauthorized third party attempted to infiltrate CCMI's computer network and demand a ransom payment. Upon detecting this incident, we moved quickly to secure our network environment and launched a thorough investigation. The investigation was performed with the help of independent IT security and forensic investigators to determine the scope and extent of the potential unauthorized access to our systems and any personal information.

Although we have found no evidence that your information has been specifically accessed for misuse, it is possible that your name, mailing address, date of birth, social security number, driver's license number, and/or financial account numbers, to the extent that such may have existed on the network, could have been exposed.

As of this writing, CCMI has not received any reports of related identity theft since the date of the incident (August 15, 2022 to present). We have taken all efforts possible to mitigate any further exposure of your personal information and related identity theft.

What We Are Doing:

We take the security of all information in our control very seriously. Given this, we have taken and are continuing to take steps to prevent a similar event from occurring in the future by implementing

additional safeguards and enhanced security measures to better protect the privacy and security of information in our systems. We have also reviewed and taken steps to enhance our policies and procedures relating to the security of our systems and servers, as well as our information life cycle management.

What You Can Do:

CCMI is providing you with access to **Single Bureau Credit Monitoring** services at no charge. These services provide you with alerts for **twelve months** from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event that you become a victim of fraud. These services will be provided by Cyberscout through Identity Force, a company specializing in fraud assistance and remediation services.

To enroll in Credit Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/ccmillc> and follow the instructions provided. When prompted please provide the following unique code to receive services: **QH8AXUSXP**. In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter.

The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering.

Enclosed hereto you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

For More Information:

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call 1-800-405-6108 Monday through Friday, during the hours of 8:00 am to 8:00 pm Eastern Standard Time (excluding U.S. national holidays). Cyberscout representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

CCMI values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

Matt Showley

Matt Showley
Partner

Brian Matter

Brian Matter
Partner

Kim Benson

Kim Benson
Partner

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-888-909-8872 www.transunion.com/credit-freeze
---	---	--

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 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 agencies 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For New York residents, the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.