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October 28, 2022

Attorney General Brian E. Frosh
Office of the Attorney General
Identity Theft Unit
200 St. Paul Place
Baltimore, MD 21202
Idtheft@oag.state.md.us

To Whom It May Concern:

We represent the Planning Team with respect to a data security incident involving the potential exposure of limited personally identifiable information (“PII”) described in more detail below. The Planning Team is committed to answering any questions you may have about the data security incident its response and steps taken to prevent a similar incident in the future.

1. Nature of security incident.

On March 31, 2022, the Planning Team discovered suspicious activity associated with two email accounts in their environment. The Planning Team immediately investigated and discovered that there had been unauthorized access to the two identified email accounts, but could not determine which files were accessed. The Planning Team then performed an analysis of the affected email accounts to determine whether personal information may have been found in the affected accounts. Based on their review, the Planning Team determined on October 13, 2022 that, for a limited number of their clients, personal information, including name, Social Security Number, driver’s license number, and financial account number, was present in one of the impacted corporate email accounts.

2. Number of residents affected.

One (1) Maryland resident may have been affected and was notified of the incident. A notification letter was sent to potentially affected individuals on October 31, 2022 (a copy of the template letter is enclosed as Exhibit A).

3. Steps taken or plan to take relating to the incident.

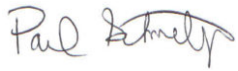
The Planning Team took steps to address this incident and prevent similar incidents in the future, including engaging independent computer forensic experts to assist with determining the scope and impact of the incident. In addition, potentially impacted individuals can enroll in twelve (12) months of complimentary credit monitoring and identity restoration services.

4. Contact information.

The Planning Team takes the security of information in its control seriously and is committed to ensuring this information is appropriately protected. If you have any questions or need additional information, please do not hesitate to contact me at pschmeltzer@clarkhill.com or (213) 417-5163.

Sincerely,

CLARK HILL

A handwritten signature in dark ink, appearing to read "Paul Schmeltzer", written over a horizontal line.

Paul F. Schmeltzer
Attorney

Enclosure



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Notice of Data Security Incident

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

We are writing to inform you of a recent data security incident experienced by the Planning Team that may have impacted your personal information. We take the privacy and security of your information seriously, and sincerely apologize for any concern or inconvenience this may cause you. This letter contains information about steps you can take to help protect your information and resources we are making available to help you.

What Happened:

The Planning Team discovered suspicious activity associated with two of the email accounts in their environment. The Planning Team began an internal investigation and determined that your information was stored in one of the email accounts affected by the incident. However, the investigation could not determine whether that information was viewed, taken, or otherwise accessed. Thus, we wanted to notify you of this incident out of an abundance of caution.

What Information Was Involved:

The information stored in the system could have included a combination of the following: your <<b2b_text_1(name, data elements)>>. But there is no evidence that any of that information was accessed or misused in any way.

What We Are Doing:

We want to assure you that we are taking steps to minimize the risk of this kind of event from happening in the future. In response to the incident, independent computer forensic experts were engaged to assist with determining the scope and impact of the incident. To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

What You Can Do:

At this time, there is no evidence that your information was misused. That said, it is always a good idea to review your credit report to identify any suspicious activity.

Please review the enclosed "Take Advantage of Your Identity Monitoring Services" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

For More Information:

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

Please contact (281) 252-9093 with any questions. Your trust is a top priority for us, and we deeply regret any inconvenience or concern that this matter may cause you.

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Sincerely,

The Planning Team



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to help protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

You should also know that you have the right to file a police report if you ever 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 some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

Place Fraud Alerts with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. 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. The contact information for all three bureaus is as follows:

Credit Bureaus

Equifax Fraud Reporting
P.O. Box 105069
Atlanta, GA 30348-5069

Equifax Credit Freeze
P.O. Box 105788
Atlanta, GA 30348-5788
1-888-836-6351
www.equifax.com/personal/credit-report-services

Experian Fraud Reporting and Credit Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion Fraud Reporting
P.O. Box 2000
Chester, PA 19022-2000

TransUnion Credit Freeze
P.O. Box 160
Woodlyn, PA 19094
1-800-680-7289
www.transunion.com

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

Please Note: No one is allowed to place a fraud alert on your credit report except you.

Security Freeze. By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

You can obtain additional information about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.

District of Columbia: Office of the Attorney General, 400 6th Street, NW, Washington, DC 20001; 202-727-3400; oag@dc.gov.

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

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 a violator. 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. You can review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201904_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.

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; <https://ag.ny.gov/>.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392.

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400. You have the right to obtain any police report filed in regard to this incident.

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft