



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

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November 2, 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 Nease, Lagana, Eden & Culley (“NLEC”) located at 2000 Riveredge Pkwy NW # 700, Atlanta, GA 30328, and are writing to notify your Office of an incident that may affect the security of some personal information relating to approximately seven (7) 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, NLEC 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 October 28, 2021, NLEC discovered suspicious activity related to an employee email account. Upon learning of this activity, NLEC immediately took steps to secure employees’ email accounts by changing account credentials and began an investigation. This investigation included working with a third-party forensic investigator to determine the nature and scope of the activity. This investigation determined that certain NLEC employee email accounts were subject to unauthorized access. Although the investigation confirmed these accounts were accessed, the investigation could not determine what, if any, emails or attachments were actually accessed. As a result, NLEC, with the assistance of third-party forensics, quickly began a programmatic and manual review of the contents of the email accounts to determine the types of information and to which individuals the information relates. On or about March 25, 2022, this extensive review was completed, and NLEC launched a supplemental review of its internal files in order to determine

which NLEC clients the information belonged. On or about June 30, 2022, NLEC's review identified that certain client information and information related to individuals with whom NLEC had a direct relationship with was impacted. While the information varies for each individual, the information that could have been subject to unauthorized access includes name, address, driver's license number, financial account information, health insurance information, medical information and Social Security number.

Notice to Maryland Residents

On or about November 2, 2022, NLEC began providing written notice of this incident to affected individuals, which includes seven (7) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit A**. Notification to impacted clients and individuals is ongoing, and NLEC may supplement this notification if it is determined that a significant amount of additional Maryland residents will receive notice.

Other Steps Taken and To Be Taken

Upon discovering the event, NLEC moved quickly to investigate and respond to the incident, assess the security of NLEC systems, and notify potentially affected individuals. NLEC is also working to implement additional safeguards and training to its employees.

NLEC is also providing complimentary access to credit monitoring services for twelve (12) years, through Experian, to individuals whose information was potentially affected by this incident. Additionally, NLEC is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1509.

Very truly yours,

Gregory Bautista of
MULLEN COUGHLIN LLC

GB/lck
Enclosure

EXHIBIT A

November 2, 2022

6 1 1191 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



Re: Notice of [Extra2]

Dear Sample A. Sample:

Nease, Lagana, Eden & Culley (“NLEC”) is writing to inform you of a recent event that may impact the security of some of your information. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the incident, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? On or about October 28, 2021, NLEC discovered suspicious activity related to an NLEC employee email account. We immediately took steps to secure the account and launched an investigation which included working with a third-party forensic investigator to determine the nature and scope of the activity. The investigation determined that email accounts belonging to certain NLEC employees were subject to unauthorized access on separate occasions between October 28, 2021 and November 17, 2021. As a result, the unauthorized actor may have had access to certain emails and attachments within these accounts.

What Information Was Involved? The investigation was unable to identify all emails or attachments in the accounts that the unauthorized individual may have accessed or acquired. Therefore, out of an abundance of caution, we conducted a review of the entire contents of the email accounts for emails or attachments that contain personal information. This review was recently completed and we are notifying you of this incident because the investigation confirmed that your information was present at the time the incident. The impacted information that is related to you includes your name, [Extra1]. To date, NLEC has not received any reports of actual or attempted misuse of your information.

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities and we take this incident very seriously. When we discovered this incident, we immediately reset the impacted email account password and took steps to determine what information was in the accounts and to which NLEC clients the information belonged. We also confirmed the security of our employee email accounts and related systems. As part of our ongoing commitment to the security of information in our care, we are working to review our existing policies and procedures, to implement additional safeguards, and to provide additional training to our employees on data privacy and security. We will also be notifying state and federal regulators, as required.

As an added precaution, we are offering you complimentary access to [Extra3] months of credit and identity monitoring, fraud consultation, and identity theft restoration services through Experian IdentityWorksSM. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Information* for additional information on these services.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Your Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call NLEC at our dedicated assistance line at (855) 896-4448, Monday through Friday from 8 am - 10 pm Central, or Saturday and Sunday from 10 am - 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number [Engagement Number].

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

Nease, Lagana, Eden & Culley

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit and Identity Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3] months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra3]-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** February 28, 2023 (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 that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (855) 896-4448 by February 28, 2023. 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 specialists 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.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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.

* 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.

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
1-800-685-1111	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105788 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, D.C. 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. Nease, Lagana, Eden & Culley is located at 2000 Riveredge Pkwy NW # 700, Atlanta, GA 30328.

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 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 Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 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. There are 4 Rhode Island residents impacted by this incident.