



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Maria Monastra
Office: (267) 930-4602
Fax: (267) 930-4771
Email: MMonastra@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

December 12, 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 North Star Leasing, a division of Peoples Bank of Marietta, Ohio (“North Star Leasing”) located at 747 Pine Street, Suite 201, Burlington, VT 05401, and are writing to notify your office of an incident that may affect the security of certain personal information relating to thirty-one (31) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, North Star Leasing 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 September 12, 2022, NorthStar Leasing became aware of suspicious activity within one of its employee’s email accounts. Upon discovery, NorthStar Leasing took steps to secure the account and promptly initiated a comprehensive investigation with the assistance of computer forensic specialists. The investigation revealed that the employee’s account was subject to unauthorized access between August 10th and September 8th, 2022. Out of an abundance of caution, a programmatic and manual review of the email account was performed to determine whether any potentially sensitive information was present and therefore accessible in the email account during the period of unauthorized access. On November 9, 2022, those review efforts were completed, and NorthStar Leasing determined which individuals were potentially affected.

The information related to Maryland residents that could have been subject to unauthorized access includes name, Social Security number, driver's license number, bank account with routing number, and financial account number.

Notice to Maryland Residents

On or about December 12, 2022, North Star Leasing began providing written notice of this incident to thirty-one (31) 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

North Star Leasing moved quickly to investigate and to respond to the incident, including by taking steps to secure the affected email account and assess any risk to information contained in that account. North Star Leasing is providing potentially affected individual access to complimentary identity monitoring services for 24 months through Experian. Additionally, as a precautionary measure, North Star Leasing is providing potentially affected individuals with guidance on how to protect against identity theft and fraud. North Star Leasing is also providing individuals with 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 incident it details, please contact us at (267) 930-4602.

Very truly yours,

Maria Monastra of
MULLEN COUGHLIN LLC

MCM/mah
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

December 12, 2022

i7161-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



NOTICE OF DATA [INCIDENT / BREACH]

Dear Sample A. Sample:

North Star Leasing, a division of Peoples Bank of Marietta, Ohio (“We” or “North Star”) is writing to inform you about a recent event that may impact the privacy of some of your personal information. Out of an abundance of caution, we are providing you with details about the event, steps we have taken in response, and resources available to assist you with safeguarding your information, should you feel it is appropriate to do so. We value and respect the privacy and security of the information entrusted to us.

What Happened? On September 12, 2022, we became aware of suspicious activity within one of our employee’s email accounts. Upon discovery, we took steps to secure the account and promptly initiated a comprehensive investigation with the assistance of computer forensic specialists. The investigation revealed that the employee’s account was subject to unauthorized access between August 10th and September 8th, 2022. Out of an abundance of caution, a programmatic and manual review of the email account was performed to determine whether any potentially sensitive information was present and therefore accessible in the email account during the period of unauthorized access. On November 9, 2022, those review efforts were completed, and we determined that the account contained your personal information, which is why you are receiving this notice. To date, we have no evidence that your personal information has been misused.

What Information Was Involved? We cannot confirm if the unauthorized person(s) accessed or viewed any specific information relating to you. However, as indicated above, we determined that the information present in the affected account and therefore accessible included your name and [Extra1 - data elements].

What We Are Doing. Safeguarding the privacy of information in our care and the security of our email environment is among our highest priorities. We promptly investigated this event and took steps to evaluate the security of our systems. As part of our ongoing commitment to privacy and security best practices, we enhanced our email security protocols to further detect and respond to anomalous activity. More broadly, we are reviewing existing policies and procedures to reduce the likelihood of a similar future event.

As an added precaution, we are offering you access to complimentary credit monitoring services for 24 months through Experian. More information about these services and instructions on how to enroll may be found in the enclosed “Steps You Can Take to Protect Information.” Due to privacy restrictions, we are unable to act on your behalf so if you would like to enroll in these services, please do so by following the instructions detailed on the following pages.



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 credit reports for suspicious activity. We also encourage you to review the enclosed *Steps You Can Take to Protect Information*. There, you will find additional resources available to you and instructions for enrollment in the complimentary credit monitoring services we are offering to you.

For More Information. We understand that you may have questions about this event that are not addressed in this letter. If you have further questions or concerns, or would like an alternative to enrolling online, please call **(833) 420-2828** toll-free 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 B081621.

We apologize for any inconvenience or concern this event may cause.

Sincerely,

A handwritten signature in black ink that reads "Dan Feeney". The signature is written in a cursive, flowing style.

Dan Feeney
Executive Vice President, Manager, North Star Leasing

Steps You Can Take to Protect Information

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 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 24 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 24-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 March 31, 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 **(833) 420-2828** by March 31, 2023. Be prepared to provide engagement number B081621 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-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.

* 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.



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 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, military identification, 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 fraud alert or 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
888-298-0045	1-888-397-3742	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. North Star Leasing is located at 747 Pine St #201, Burlington, VT 05401.

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 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. 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; 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 15 Rhode Island residents impacted by this incident.

