



December 13, 2022

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Via Electronic Mail: Idtheft@oag.state.md.us

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

Re:	Our Client	:	The Elizabeth Hospice
	Matter	:	Data Security Incident
	Wilson Elser File #	:	16516.02029

Dear Attorney General Frosh:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents The Elizabeth Hospice (“TEH”) with respect to a recent data privacy incident (hereinafter, the “Incident”). TEH takes the security and privacy of the information in its control very 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 Incident, what information may have been compromised, the number of Maryland residents being notified, and the steps that TEH has taken in response to the Incident. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring services.

1. Nature of Incident

On October 21, 2022, THE learned that one its now former employees was forwarding emails from her business email account to her personal email account while employed with the organization. TEH immediately began an internal review of the employee's business email account. Although TEH is unaware of any fraudulent misuse of information, TEH determined on November 14, 2022, that the following information may have been exposed as a result of this incident: first name, last name, date of admission, date of discharge, patient account number, and basic health information.

As of this writing, TEH has not received any reports of related identity theft since the date of the Incident.

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2. Number of Maryland residents affected.

A total of five (5) Maryland residents have been potentially affected by this incident. Notification letters to individuals will be mailed to potentially impacted individuals on December 14, 2022, by first class mail. A sample copy of the notification letter is included with this letter under *Exhibit A*.

3. Steps taken in response to the Incident.

TEH is committed to ensuring the security and privacy of all personal information in its control, and is taking steps to prevent a similar incident from occurring in the future. Upon discovery of the Incident, TEH moved quickly to respond to the Incident, which included conducting an investigation to determine the extent of PHI transferred and identify potentially impacted individuals.

Although TEH is not aware of any actual or attempted misuse of the affected personal information, TEH provided guidance on how to better protect against identity theft and fraud, including providing 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 the contact details for the Federal Trade Commission.

4. Contact information

TEH 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 Ross.Molina@WilsonElser.com or 504.702.1726.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Ross M. Molina

RM/ejl

Copy: Erica Lloyd, Esq. (Wilson Elser LLP)

Enclosure: *Sample Notification Letter*

Exhibit A



December 14, 2022

Notice of Data Breach

Dear [REDACTED],

The Elizabeth Hospice (“TEH”) is a nonprofit hospice that provides medical, emotional and spiritual support to children and adults with locations in Carlsbad, Escondido, San Diego, and Temecula, California. We are writing in order to inform you of an incident that may have exposed your personal health information. We take the security of your personal information seriously and apologize for any inconvenience or concern this has caused.

What Happened and What Information Was Involved:

On October 21, 2022, TEH learned that one its now former employees was forwarding emails from her business email account to her personal email account while employed with the organization. TEH immediately began an internal review of the employee's business email account, and determined on November 14, 2022, that the following information may have been exposed as a result of this incident: first name, last name, date of admission, date of discharge, patient account number, and basic health information.

Please note that your Social Security number and financial account information were not involved in this incident.

As of this writing, TEH is not aware of any reports of identity fraud resulting from this incident, or that any personal information has actually been misused.

What We Are Doing:

Upon detecting this incident, we moved quickly to initiate a response, which included conducting an investigation to determine the extent of PHI transferred and identify potentially impacted individuals.

We have no evidence that any of your personal information has been or will be misused in any manner. However, we encourage you to remain vigilant in protecting your personal information. Enclosed you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

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For More Information:

We recognize that you may have questions not addressed in this letter. Cyberscout representatives are available for 90 days from the date of this letter, to assist you with questions regarding this incident, between the hours of 8:00 am to 8:00 pm Eastern time, Monday through Friday, excluding holidays. If you have additional questions, please call us at 1-833-530-1802.

The Elizabeth Hospice values the security of the personal data that we protect, and we apologize for any inconvenience that this incident has caused.

Sincerely,

The Elizabeth Hospice

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:

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