



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Jeffrey J. Boogay
Office: (267) 930-4784
Fax: (267) 930-4771
Email: jboogay@mullen.law

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

January 20, 2023

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 Eurasia Group located at 149 Fifth Avenue, 15th Floor, New York, NY 10010, and are writing to notify your office of incidents that may affect the security of certain personal information relating to thirty-five (35) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Eurasia Group 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

In December 2020, Eurasia Group discovered suspicious activity within its email system. Eurasia Group immediately launched an investigation, with the assistance of third-party forensic specialists, and determined that they had been the target of a sophisticated threat actor. Due to the sophistication of this intrusion, Eurasia Group continued to experience additional intrusions believed to have been perpetrated by the same group. Throughout that time, Eurasia Group worked with its third-party computer forensic specialists to identify the potential access and to secure its systems. Eurasia Group also undertook a lengthy and labor-intensive process to identify sensitive information that may have been contained within the email accounts impacted by this event, and to identify the individuals whose information may have been impacted. Eurasia Group then worked to identify contact information for the impacted individuals.

On or about June 24, 2022, Eurasia Group again discovered suspicious activity within its email system. Eurasia Group immediately launched an investigation into this activity, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the event. This investigation determined that what is believed to be the same unauthorized threat actor group may have had additional access to certain Eurasia Group employee email accounts. Eurasia Group took steps to identify the potential access resulting from this repeat attack and to secure its systems.

Eurasia Group then began an additional lengthy and labor-intensive process to identify sensitive information that may have been contained within the email accounts. Eurasia Group then worked to identify contact information for the impacted individuals, which was completed on December 23, 2022.

The information that could have been subject to unauthorized access includes name, Social Security number, financial account information, driver's license number, alien registration number, government issued identification number, medical information, passport number, and health insurance information.

Notice to Maryland Residents

On or about January 20, 2023, Eurasia Group provided written notice of this incident to thirty-five (35) 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

Upon discovering the events, Eurasia Group moved quickly to investigate and respond, assess the security of Eurasia Group systems, and identify potentially affected individuals. Eurasia Group is also working to implement additional safeguards and training to its employees. Eurasia Group is providing access to credit monitoring services for twelve (12) months, through IDX, to individuals whose personal information was potentially affected, at no cost to these individuals.

Additionally, Eurasia Group is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Eurasia Group is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

Eurasia Group is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4784.

Very truly yours,



Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB/kzf
Enclosure

EXHIBIT A



10300 SW Greenburg Rd.
Suite 570
Portland, OR 97223

To Enroll, Please Call:
1-800-939-4170
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: <<XXXXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

January 20, 2023

Re: Notice of Security Incident

Dear <<First Name>> <<Last Name>>,

Eurasia Group is writing to inform you of an event that may impact the privacy of some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with information about the event, our response, and steps you may take to protect against any misuse of your information, should you feel it is necessary to do so.

What Happened? Eurasia Group learned of potentially suspicious activity within its email systems. Eurasia Group immediately launched an investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the event. Through this investigation, Eurasia Group determined it was the target of unauthorized access through a sophisticated intrusion. Due to the sophistication of this intrusion, Eurasia Group continued to experience additional intrusions believed to have been perpetrated by the same group. Throughout that time, Eurasia Group worked with its third-party computer forensic specialists to identify the potential access and to secure its systems. Eurasia Group also undertook a lengthy and labor-intensive process to identify sensitive information that may have been contained within the email accounts impacted by this event, and to identify the individuals whose information may have been impacted. Eurasia Group then worked to identify contact information for the impacted individuals. We are notifying you because that investigation recently determined certain information related to you may have been subject to unauthorized access.

What Information Was Involved? The information contained in the accessible email accounts includes your name, <<extra 2>>. We have no evidence your information was subject to actual or attempted misuse and doing so did not seem to be the intention of the unauthorized actors.

What We Are Doing. Eurasia Group takes this incident and the security of your personal information seriously. Upon discovery, we immediately launched an investigation and took steps to secure our systems. We are reviewing our policies, procedures, and processes related to storage of and access to personal information.

As an added precaution, Eurasia Group is providing you with access to <<12/24 months>> of credit monitoring and identity protection services through IDX. A description of services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Help Protect Your Information*. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services on your behalf.

What You Can Do. You can review the enclosed *Steps You Can Take to Help Protect Your Information* to learn helpful tips on steps you can take to protect against possible misuse should you feel it appropriate to do so. We also encourage you to review your account statements and report all suspicious activity to the institution that issued the record immediately.

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, you can call our dedicated call center at 1-800-939-4170 Monday through Friday from 9 am – 9 pm Eastern Time.

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

Sincerely,

A handwritten signature in black ink, appearing to read "C. Spatt". The signature is fluid and cursive, with a large initial "C" and a stylized "S" for "Spatt".

Eurasia Group, Ltd.

Steps You Can Take to Help Protect Your Information

Enroll in Credit Monitoring

1. Website and Enrollment. Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is April 20, 2023.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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, 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
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. Eurasia Group is located at 149 Fifth Avenue, 15th Floor, New York, NY 10010.

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 [##] Rhode Island residents impacted by this incident.