

January 27, 2023

**Anjali C. Das**  
312.821.6164 (direct)  
Anjali.Das@wilsonelser.com

**Via Email: IDTheft@oag.state.md.us**

**Attorney General Anthony G. Brown  
Office of the Attorney General  
Attn: Security Breach Notification  
200 St. Paul Place  
Baltimore, MD 21202**

**Re: Cybersecurity Incident Involving Beartooth Billings Clinic**

Dear Attorney General Brown:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents Davido Consulting Group (“DCG”) a full-service civil, structural, marine, and environmental engineering firm located at 9706 4th Ave NE #300, Seattle, Washington 98115, with respect to a recent cybersecurity incident that was first discovered by DCG on November 9, 2022 (hereinafter, the “Incident”). DCG 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 DCG 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 the Incident**

On November 9, 2022, DCG detected unusual activity on several of its email accounts. Upon discovery of this incident, DCG immediately secured the accounts and promptly engaged a specialized third-party cybersecurity firm to conduct a comprehensive investigation to determine the nature and scope of the incident. The forensic investigation determined that one of DCG’s email accounts may have been compromised by an unauthorized actor. The accounts have since been secured and remediated.

Although DCG is unaware of any fraudulent misuse of information, it is possible that individuals’ full name, phone number, address, and social security number may have been exposed as a result of this inadvertent disclosure.

As of this writing, DCG has not received any reports of related identity theft since the date of the incident November 9 to present.

**2. Number of Maryland residents affected.**

DCG identified and notified 109 individuals potentially affected by this Incident. Of those, **one (1)** was a resident of Maryland. Notification letters to these individuals were mailed on January 27, 2023, 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.**

DCG 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, DCG moved quickly to investigate and respond to the Incident, assessed the security of its systems, and notified the potentially affected individuals. Specifically, DCG enhanced its security measures to avoid reoccurrence of the situation by increasing its level of training and education for its employees. Lastly, DCG informed our law firm and began identifying the potentially affected individuals in preparation for notice.

Although DCG is not aware of any actual or attempted misuse of the affected personal information, DCG offered 12 months of complimentary credit monitoring and identity theft restoration services through IDX to all individuals to help protect their identity. Additionally, DCG 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**

DCG 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 [Anjali.Das@WilsonElser.com](mailto:Anjali.Das@WilsonElser.com) or 312-821-6164.

Very truly yours,

**Wilson Elser Moskowitz Edelman & Dicker LLP**



Anjali C. Das

## **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]

*Via First-Class Mail*

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

January 27, 2023

**Re: Data Security Incident**

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

Davido Consulting Group, Inc. (DCG) is writing to inform you of a recent data security incident that may have resulted in an unauthorized access to your sensitive personal information. While we are unaware of any fraudulent misuse of your personal information at this time, we are providing you with details about the incident, steps we are taking in response, and resources available to help you protect against the potential misuse of your information.

**What Happened?**

On November 9, 2022, DCG detected unusual activity on several of its email accounts. Upon discovery of this incident, DCG immediately secured the accounts and promptly engaged a specialized third-party cybersecurity firm to conduct a comprehensive investigation to determine the nature and scope of the incident. The forensic investigation determined that one of DCG's email accounts may have been compromised by an unauthorized actor. The accounts have since been secured and remediated.

On December 27, 2022, DCG finalized the list of individuals to notify.

**What Information Was Involved?**

Although DCG has no evidence that any sensitive information has been misused by third parties as a result of this incident, we are notifying you out of an abundance of caution and for purposes of full transparency. Based on the investigation, the following information related to you may have been subject to unauthorized access: full name; home address; date of birth; social security number; and banking information for direct deposit.

**What We Are Doing**

Data privacy and security is among DCG's highest priorities, and we are committed to doing everything we can to protect the privacy and security of the personal information in our care. Since the discovery of the incident, DCG moved quickly to investigate, respond, and confirm the security of our systems. Specifically, DCG changed all user credentials, enhanced the security measures, and took steps and will continue to take steps to mitigate the risk of future harm.

In light of the incident, we are also providing you with 12 months of complimentary credit monitoring and identity theft restoration services through IDX. While we are covering the cost of these services, you will need to complete the activation process by following the instructions below.

## **What You Can Do**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious or unauthorized activity. Additionally, security experts suggest that you contact your financial institution and all major credit bureaus to inform them of such a breach and then take whatever steps are recommended to protect your interests, including the possible placement of a fraud alert on your credit file. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, to learn more about how to protect against the possibility of information misuse.

In addition, we are offering identity theft protection services through IDX, the data breach and recovery services expert. IDX identity protection services include: 12 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 6 a.m. - 6 p.m. Pacific Standard Time. Please note the deadline to enroll is April 27, 2023.

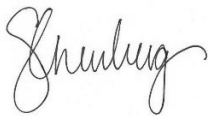
Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

## **For More Information**

If you have any questions or concerns not addressed in this letter, please call 1-206-523-0024 x317 Monday through Friday, during the hours of 9:00 a.m. and 5:00 p.m. Pacific Standard Time (excluding U.S. national holidays).

DCG sincerely regrets any concern or inconvenience this matter may cause, and remains dedicated to ensuring the privacy and security of all information in our control.

Sincerely,



Stephanie Cherberg, SPHR, SHRM-SCP  
Vice President of Operations  
Davido Consulting Group, Inc.

## Steps You Can Take to Help Protect Your 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](http://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.

**Fraud Alerts:** You can place fraud alerts with the three credit bureaus by phone or online. 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.

**Experian**  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

**TransUnion**  
P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289

[www.transunion.com/fraud-alerts](http://www.transunion.com/fraud-alerts)

**Equifax**  
P.O. Box 105069  
Atlanta, GA 30348  
1-800-525-6285

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

**Monitoring:** You should always remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and by monitoring your credit report for suspicious or unusual activity.

**Security Freeze:** You 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:

**Experian**  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

**TransUnion**  
P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

**Equifax**  
P.O. Box 105788  
Atlanta, GA 30348-5788  
1-888-298-0045

<https://www.equifax.com/personal/credit-report-services/credit-freeze/>

**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](http://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. Instances of known or suspected identity theft should also be reported to law enforcement.

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**For residents of Iowa:** State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

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**For residents of Massachusetts:** It is required by state law that you are informed of your right to obtain a police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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**For residents of New Mexico:** State law advises you to review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. 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 at [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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.

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**For residents of Oregon:** State law advises you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

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**For residents of Rhode Island:** It is required by state law that you are informed of your right to file or obtain a police report in regard to this incident.

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**For residents of Arizona, Colorado, District of Columbia, Illinois, Maryland, New York, North Carolina, and Rhode Island:** You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

**Federal Trade Commission - Consumer Response Center:** 600 Pennsylvania Ave, NW, Washington, DC 20580; 1-877-IDTHEFT (438-4338); [www.identitytheft.gov](http://www.identitytheft.gov)

**Arizona Office of the Attorney General** Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004 1-602-542-5025

**Colorado Office of the Attorney General** Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000 [www.coag.gov](http://www.coag.gov)

**District of Columbia Office of the Attorney General – Office of Consumer Protection:** 400 6th Street, NW, Washington, DC 20001; 202-727-3400; [www.oag.dc.gov](http://www.oag.dc.gov)

**Illinois office of the Attorney General -** 100 West Randolph Street, Chicago, IL 60601; 1-866-999-5630; [www.illinoisattorneygeneral.gov](http://www.illinoisattorneygeneral.gov)

**Maryland Office of the Attorney General - Consumer Protection Division:** 200 St. Paul Place, 16<sup>th</sup> floor, Baltimore, MD 21202; 1-888-743-0023; [www.oag.state.md.us](http://www.oag.state.md.us)

**New York Office of Attorney General - Consumer Frauds & Protection:** The Capitol, Albany, NY 12224; 1-800-771-7755; <https://ag.ny.gov/consumer-frauds/identity-theft>

**North Carolina Office of the Attorney General - Consumer Protection Division:** 9001 Mail Service Center, Raleigh, NC 27699; 1-877-566-7226; [www.ncdoj.com](http://www.ncdoj.com)

**Rhode Island Office of the Attorney General - Consumer Protection:** 150 South Main St., Providence RI 02903; 1-401-274-4400; [www.riag.ri.gov](http://www.riag.ri.gov)

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