



MULLEN
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February 8, 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

To Whom It May Concern:

We represent Sedulous Consulting Services, LLC (“Sedulous”) located at 18300 Quantico Gateway Drive, Suite 201, Triangle, VA 22172, and are writing to notify your office of an incident that may affect the security of certain personal information relating to five (5) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Sedulous 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 January 25, 2023, a Sedulous employee inadvertently provided W-2 information to an unauthorized individual. Sedulous immediately identified the disclosure and reviewed the W-2 information in order to determine the specific information contained therein and to whom the information pertains. Sedulous completed its review on January 26, 2023, and determined that personal information pertaining to certain employees was contained within the potentially impacted W-2 information. Sedulous is not aware of any actual or attempted fraudulent use of personal information as a result of this incident.

The information that could have been subject to unauthorized access includes name and Social Security number.

Notice to Maryland Residents

On February 8, 2023, Sedulous provided written notice of this incident to five (5) 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 event, Sedulous moved quickly to investigate and respond to the incident, and identify potentially affected individuals. Further, Sedulous notified federal law enforcement and the IRS regarding the event. Sedulous is reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future incident. Sedulous is providing access to triple-bureau credit monitoring services for two (2) years through Equifax to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Sedulous 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. Sedulous is 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 security event, please contact us at (267) 930-1613.

Very truly yours,

Katie Butler of
MULLEN COUGHLIN LLC

KLB/myc
Enclosure

EXHIBIT A

[SEDULOUS CONSULTING SERVICES LETTERHEAD]

<<First Name>> <<Last Name>>

<<Address 1>>

<<Address 2>>

<<City>>, <<State>> <<Zip>>

[Date]

NOTICE OF SECURITY INCIDENT

Dear <<First Name>> <<Last Name>>:

Sedulous Consulting Services, LLC (“Sedulous”) is writing to notify you of an incident that may impact the privacy of some of your personal information. At this time, we are not aware of any actual or attempted fraudulent use of your information as a result of this incident, but in an abundance of caution, we are providing you with information about the incident, our response to it, and resources we are making available to you to help protect your information, should you feel it is necessary to do so.

What Happened? On January 25, 2023, a Sedulous employee inadvertently provided W-2 information to an unauthorized individual. We immediately identified the disclosure and reviewed the W-2 information in order to determine the specific information contained therein and to whom the information pertains. We completed our review on January 26, 2023, and determined that information pertaining to you was included in the impacted W-2 information.

What Information Was Involved? The information impacted by this incident includes your name and Social Security number.

What We Are Doing. The confidentiality, privacy, and security of our employees’ information is among our highest priorities, and we have strict security measures in place to protect this information. Upon discovering this incident, we moved quickly to investigate and respond as well as identify the impacted individuals so that we could provide notice as soon as possible. As part of our ongoing commitment to the security of information, we are reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future incident. We also promptly reported this incident to law enforcement and will continue to cooperate with any investigation. We are also notifying state regulators as required.

In an abundance of caution, we are offering you access to 24 months of credit monitoring and identity theft protection services through Equifax at no cost to you. The deadline to enroll in these services is May 31, 2023. Please note that you will not be automatically enrolled in these services as we are not able to do so on your behalf. You may find instructions on how to enroll in the enclosed *Steps You Can Take to Help Protect Personal Information*.

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. You may also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*. There you will also find more information on the complimentary credit monitoring and identity theft protection services we are making available to you.

For More Information. If you have additional questions, please contact [name] at [email] or (703) 630-9550.

We sincerely regret any inconvenience or concern this incident may cause you. Protecting your information is very important to us, and we remain committed to safeguarding the information in our care.

Sincerely,

[Signature]

Omar Dennis
President & CEO
Sedulous Consulting Services, LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Restoration



Enter your Activation Code: **<Activation Code>**

Enrollment Deadline: **May 31, 2023**

Equifax Complete™ Premier

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Annual access to your 3-bureau credit report and VantageScore¹ credit scores
- Daily access to your Equifax credit report and 1-bureau VantageScore credit score
- 3-bureau credit monitoring² with email notifications of key changes to your credit reports
- WebScan notifications³ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts⁴, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock⁵
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁶.
- Lost Wallet Assistance if your wallet is lost or stolen, and one-stop assistance in canceling and reissuing credit, debit and personal identification cards.

Enrollment Instructions

Go to www.equifax.com/activate

Enter your unique Activation Code of **<Activation Code>** then click “Submit” and follow these 4 steps:

1. **Register:**
Complete the form with your contact information and click “Continue”.
If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.
Once you have successfully signed in, you will skip to the Checkout Page in Step 4
2. **Create Account:**
Enter your email address, create a password, and accept the terms of use.
3. **Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click ‘Sign Me Up’ to finish enrolling.
You’re done!
The confirmation page shows your completed enrollment.
Click “View My Product” to access the product features.

¹The credit scores provided are based on the VantageScore® 3.0 model. For three-bureau VantageScore credit scores, data from Equifax®, Experian®, and TransUnion® are used respectively. Any one-bureau VantageScore uses Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.

²Credit monitoring from Experian and TransUnion will take several days to begin.

³WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is

suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

⁴The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

⁵Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com

⁶The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. 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, 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 one-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 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	888-397-3742	800-916-8800
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; 877-ID-THEFT (877-438-4338); and TTY: 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. Sedulous Consulting Services, LLC is located at 18300 Quantico Gateway Drive, Suite 201, Triangle, VA 22172.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 410-528-8662 or 888-743-0023; and www.oag.state.md.us. Sedulous Consulting Services, LLC is located at 18300 Quantico Gateway Drive, Suite 201, Triangle, VA 22172.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-566-7226 or 919-716-6000; and www.ncdoj.gov. Sedulous Consulting Services, LLC is located at 18300 Quantico Gateway Drive, Suite 201, Triangle, VA 22172.