



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

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April 3, 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](mailto:idtheft@oag.state.md.us)

**Re: Notice of Data Event**

To Whom It May Concern:

We represent Hankins & Sohn Plastic Surgery Associates (“Hankins & Sohn”) located at 60 North Pecos Road, Henderson, Nevada 89074, and are writing to notify your office of an incident that may affect the security of certain personal information relating to six (6) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Hankins & Sohn 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 or about February 23, 2023, Hankins & Sohn became aware of suspicious activity relating to allegations by an unknown actor that data was stolen from its network. Hankins & Sohn quickly took steps to investigate the validity of the claims and to assess the nature and scope of the activity and what information may have been affected. Hankins & Sohn is also working with law enforcement to investigate the activity. Hankins & Sohn learned that files were taken by the unknown actor prior to this date.

Hankins & Sohn worked diligently to review the information on its systems in order to identify individuals whose information may have been impacted by the event. Hankins & Sohn provided preliminary email notification about the incident to individuals on March 14, 2023, prior to confirming what information was in the affected files and which individuals may have been impacted. Hankins & Sohn was unable to confirm which specific patients’ information may be at risk and ultimately made the decision to notify all current and former patients and consults in an abundance of caution. Hankins & Sohn is not aware of any actual or attempted fraudulent misuse of individuals’ information as a result of this incident.

The information that could have been subject to unauthorized access may vary by individual but includes name and contact information, date of birth, Social Security number, driver’s license information, medical history, consultation notes, and photos.

**Mullen.law**

### **Notice to Maryland Residents**

As noted above, Hankins & Sohn sent preliminary notice to potentially impacted individuals on March 14, 2023. On April 3, 2023, Hankins & Sohn began mailing written notice of this incident to the impacted individuals including six (6) 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 becoming aware of the event, Hankins & Sohn moved quickly to investigate and respond to the incident, assess validity of the claims by the unknown actor, and identify potentially affected individuals. Further, Hankins & Sohn notified federal law enforcement regarding the event and is actively participating in law enforcement's investigation.

Hankins & Sohn is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Hankins & Sohn 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) 930-1129.

Very truly yours,

Brittany R. Bickel of  
MULLEN COUGHLIN LLC

BRB/rmm  
Enclosure

# **EXHIBIT A**



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

April 3, 2023



J2518-L02-0000002 T00001 P001 \*\*\*\*\*SCH 5-DIGIT 12345  
SAMPLE A SAMPLE - L02 NO CREDIT MONITORING  
APT ABC  
123 ANY STREET  
ANYTOWN, ST 12345-6789



## NOTICE OF [SECURITY INCIDENT / DATA BREACH]

Dear Sample A. Sample:

Hankins & Sohn Plastic Surgery Associates (“Hankins & Sohn”) is writing to inform you of a recent data security event that may have impacted some of your information. We are providing you with information about the event, our response, and resources available to you to help protect your information, should you feel it is appropriate to do so.

**What Happened.** On or about February 23, 2023, Hankins & Sohn became aware of suspicious activity relating allegations by an unknown actor that data was stolen from our network. We quickly took steps to investigate the validity of the claims and to assess the nature and scope of the activity and what information may have been affected. We are also working with law enforcement to investigate the activity. We learned that files were taken by the unknown actor prior to this date.

We worked diligently to review the information on our systems in order to identify individuals whose information may have been impacted by this event. We are unable to confirm which specific patients’ information may be at risk; we ultimately made the decision to notify all current or former patients and consults in an abundance of caution. Your information was present on our systems at the time of the incident and was therefore potentially impacted by this event.

**What Information Was Involved.** While the information may vary by individual, the types of information that could be impacted include name, contact information, date of birth, Social Security number, driver’s license information, medical history, consultation notes, and photos.

**What We Are Doing.** The confidentiality, privacy, and security of information in our care are among our highest priorities, and we take this incident very seriously. Upon becoming aware of this event, we immediately took steps to contact law enforcement and to review the potentially impacted information. We then worked to confirm the address information for potentially impacted individuals in order to provide this notice. We also reviewed our security policies and enhanced procedures to reduce the risk of similar future events.

**What You Can Do.** We suggest you review your social media profile settings and adjust your privacy settings, to further protect your accounts and limit what can be posted by others on your profile. While we are unaware of any identity theft or fraud as a result of this event, 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. Please also review the enclosed *Steps You Can Take to Help Protect Your Information*, which contains information on what you can do to safeguard against possible misuse of your information should feel it is appropriate to do so.

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**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, please contact our call center at 1-800-910-5156, 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 B088794. You may also write to Hankins & Sohn at 60 North Pecos Road, Henderson, Nevada 89074.

Sincerely,

Hankins & Sohn Plastic Surgery Associates

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

### **Lock Down Your Social Media Profiles**

Review your profile settings in your social media accounts to strengthen the privacy of your accounts. Make your account private and limit what can be posted by others on your profile. Enable the option to review tags before they appear on your profile. Only accept friend requests and follows from people that you know. Enable multi-factor authentication to prevent unauthorized logins.

### **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](http://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 credit 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:

| <b>Equifax</b>                                                                                                                  | <b>Experian</b>                                                             | <b>TransUnion</b>                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| <a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a> | <a href="https://www.experian.com/help/">https://www.experian.com/help/</a> | <a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a> |
| 888-298-0045                                                                                                                    | 1-888-397-3742                                                              | 1 (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](http://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](http://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](http://www.oag.state.md.us). You can obtain information about the steps you can take to avoid identity theft from the Maryland Attorney General and the Federal Trade Commission (using the contact information included above).

*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](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.

*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](http://www.ncdoj.gov).