



Joseph V. DeMarco

Telephone:
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jvd@demarcolaw.com

May 25, 2023

Via E-mail

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

RE: SECURITY BREACH NOTIFICATION

To Whom It May Concern:

We are counsel the Police Athletic League, a 501(c)(3) not-for-profit organization focused on bridging the gap between police and the communities they serve with programs for youth across a wide range of sports, after-school activities, and educational initiatives. Since our founding in 1914, PAL has had great success in supporting and improving the lives of kids in New York City and we are proud of our work. Our members and volunteers build character, help with police-community relations, and mentor vulnerable and at-risk youth across the five boroughs of New York City. We write to inform your office of a data security incident.

On March 17, 2022, the Police Athletic League (“PAL”) became aware of unauthorized access to an account Microsoft 365 email environment. Specifically, a PAL employee became aware that emails were being sent from his account to various internal and external recipients. Upon discovery of the incident, which occurred within minutes of the unauthorized emails being sent, PAL IT immediately revoked access to the account and commenced an investigation. In the course of this investigation, on May 4, 2022, the forensics firm that PAL retained, Kroll, informed PAL that that three additional email accounts were likely accessed by an unknown unauthorized third party around the same time. On June 10, 2022, Kroll identified evidence that twelve additional accounts were potentially compromised in late April and May in a potentially related phishing campaign against employees. The incident has been reported to law enforcement and PAL is committed to cooperating with any investigation.

PAL retained Kroll to analyze the data in these compromised email accounts. Because of the volume of data involved it took a significant period of time to manually review the contents of the compromised accounts to assess PAL’s legal obligations. Upon review of the data, Kroll identified certain personally identifying information connected to three (3) Maryland residents, including Social Security Numbers, a driver’s license, and an account number.



May 25, 2023

The motive of the threat actor (TA) is unclear, but it appeared to be motivated by a desire to impersonate PAL employees to commit financial fraud on PAL or use the accounts to conduct additional phishing campaigns. However, while the investigation did not reveal any affirmative evidence that the TA accessed or acquired any personal information (PI), Kroll could not rule out the possibility that this occurred.

PAL will be sending written notifications to impacted individuals later today, on May 25, 2023. These letters will include an offer of 24 months of complimentary credit monitoring. A template of the letter, which will be personalized for each individual, is enclosed with this letter.

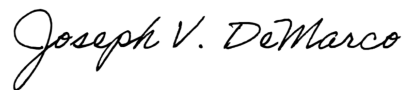
As a result of this incident, PAL implemented or is working on implementing a number of measures to improve security, including:

- resetting relevant passwords;
- deploying multi-factor authentication across the firm;
- implementing new technical safeguards;
- arranging for additional cybersecurity training for firm staff;
- improving physical security; and
- revising policies and procedures.

PAL is also undertaking a comprehensive cybersecurity assessment that will involve the creation and adoption of a Written Information Security Plan and other policy improvements, enhanced monitoring and regular testing of its systems, employee training, and the creation of other technical, administrative, and physical safeguards to protect the data on its systems.

If you have any additional concerns or questions, please feel free to contact me at jvd@demarcolaw.com or (917) 576-2369.

Regards,

A handwritten signature in black ink that reads "Joseph V. DeMarco". The signature is written in a cursive, flowing style.

Joseph V. DeMarco

Enclosure: Sample Letter



POLICE
ATHLETIC
LEAGUE, INC.

The best friend a kid can have

34 ½ East 12th Street, New York, NY 10003

34 ½ East 12th Street, New York, NY 10003

t: 212.477.9450 | f: 212.477.6541 | w: www.palnyc.org

1 1 1 *****AUTO**MIXED AADC 300

SAMPLE A. SAMPLE - L01

APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



May 23, 2023

RE: Important Security Notification. Please read this entire letter.

Dear Sample A. Sample:

We are writing to tell you about a data security incident at the Police Athletic League (PAL) that may have exposed some of your personal information. We take the protection and proper use of your information very seriously. For this reason, we are contacting you directly to explain the circumstances of the incident.

What happened?

On March 17, 2022, PAL became aware of unauthorized access to an account Microsoft 365 email environment. Upon learning about the unauthorized access, PAL IT immediately revoked access to the account. PAL also promptly retained counsel and a leading independent forensics firm to investigate the incident. In the course of this investigation, On May 4, 2022, the forensics firm informed PAL that that three additional email accounts were associated with indicators of compromise. On June, 10, 2022, the forensics firm identified evidence that twelve additional accounts were potentially compromised. The incident has been reported to law enforcement and PAL is committed to cooperating with any investigation.

What information was involved?

While the unauthorized third party had access to these accounts, it is possible that the following personal data were accessible: [Extra1].

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by September 30, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **1-877-890-9332**, 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) by September 30, 2023. Be prepared to provide engagement number **B087096** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

What You Can Do. Please review the enclosed *Information about Identity Theft Protection* for additional information on how to protect against identity theft and fraud. You may also take advantage of the complimentary identity protection services being offered.

For More Information. We sincerely regret any inconvenience or concern caused by this incident. If you have further questions or concerns, please send us a message at inquiries@palnyc.org or call (212) 927-7389.

Sincerely,

The Police Athletic League

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Information about Identity Theft Protection

Monitor Your Accounts

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax®
P.O. Box 740241
Atlanta, GA 30374-0241
1-800-685-1111
www.equifax.com

Experian
P.O. Box 9701
Allen, TX 75013-9701
1-888-397-3742
www.experian.com

TransUnion®
P.O. Box 1000
Chester, PA 19016-1000
1-800-888-4213
www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Credit Freeze

You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies listed below.

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

Experian
P.O. Box 9554
Allen, TX 75013-9554
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016-2000
1-888-909-8872
www.transunion.com/credit-freeze

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze:

- 1) Full name, with middle initial and any suffixes;
- 2) Social Security number;
- 3) Date of birth (month, day, and year);
- 4) Current address and previous addresses for the past five (5) years;
- 5) Proof of current address, such as a current utility bill or telephone bill;
- 6) Other personal information as required by the applicable credit reporting agency;

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Fraud Alerts

You also have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert lasts 1-year and 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 7 years. Should you wish to place a fraud alert, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-888-766-0008
www.equifax.com/personal/credit-report-services

Experian
P.O. Box 9554
Allen, TX 75013-9554
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016-2000
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Monitor Your Personal Health Information

If applicable to your situation, we recommend that you regularly review the explanation of benefits statement that you receive from your insurer. If you see any service that you believe you did not receive, please contact your insurer at the number on the statement. If you do not receive the regular explanation of benefits statements, contact your provider and request them to send such statements following the provision of services in your name or number.

You may want to order copies of your credit reports and check for any medical bills that you do not recognize. If you find anything suspicious, call the credit reporting agency at the phone number on the report. Keep a copy of this notice for your records in case of future problems with your medical records. You may also want to request a copy of your medical records from your provider, to serve as a baseline. If you are a California resident, we suggest that you visit the website of the California Office of Privacy Protection at www.privacy.ca.gov to find more information about your medical privacy.

Additional Information

You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

The Federal Trade Commission

600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-ID-THEFT (1-877-438-4338)
TTY: 1-866-653-4261
www.ftc.gov/idtheft

For Connecticut Residents, the Connecticut Attorney General's Office may be contacted at, 55 Elm Street, Hartford, CT 06106, 1-860-8085318, www.ct.gov/ag.

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.

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.