



MULLEN
COUGHLIN^{LLC}
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426 W. Lancaster Avenue, Suite 200
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June 29, 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 CES Consulting, LLC (“CES”), located at 4245 Sigler Road, Warrenton, VA, 20187, and are writing to notify your Office of an incident that may affect the security of certain information relating to sixty (60) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CES 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 December 15, 2022, CES discovered suspicious activity related to an employee email account. In response, CES quickly took steps to secure the account and with the assistance of third-party forensic specialists, began an investigation to determine the nature and scope of the activity. The investigation confirmed an unauthorized individual was able to access the email account between December 8 and December 15, 2022. While the investigation was able to confirm the account was accessed, it was not able to confirm whether any specific emails or attachments in the account were actually accessed. Therefore, out of an abundance of caution, CES then undertook a comprehensive review of the email account to understand the contents of the account and to whom the information related. While the information varied for some individuals, the information that could have been subject to unauthorized access includes name, Social Security number, driver’s license or state identification number, and/or financial account information.

Notice to Maryland Residents

On June 29, 2023, CES provided written notice of this incident to sixty (60) 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, CES moved quickly to investigate and respond to the incident, assess the security of CES email accounts, and identify potentially affected individuals. CES is also working to implement additional safeguards and training to its employees. CES is providing complimentary access to credit monitoring services for twelve (12) months, through Experian, to individuals whose information was potentially affected by this incident.

Additionally, CES is providing impacted individuals with guidance on how to better protect against identity theft and fraud. CES is also 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) 930-4637.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gregory Lederman".

Gregory Lederman of
MULLEN COUGHLIN LLC

GCL/rmm
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

Construction Management • Engineering • Project Controls
DBE/MBE/LDBE/SWaM • Proven, Pursuing and Delivering Excellence

111 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



June 29, 2023

Re: Notice of Data [Extra2]

Dear Sample A. Sample:

CES Consulting, LLC (“CES”) writes to notify you of a recent incident that may affect the privacy of some of your information. Although we have no evidence of misuse of your information, we write to provide you with information about the incident, our response, and steps you can take to help protect against the possible misuse of your information, should you feel it is appropriate to do so.

What Happened? On or about December 15, 2022, CES discovered suspicious activity related to an employee email account. In response, we quickly took steps to secure the account and with the assistance of third-party forensic specialists, began an investigation to determine the nature and scope of the activity. Our investigation confirmed an unauthorized individual was able to access the email account between December 8 and December 15, 2022. Given that certain information within the account may have been available or accessed by the unauthorized individual, we then undertook a comprehensive review of the email account to understand the contents of the account and to whom it related.

What Information Was Involved? We are notifying you because our investigation and review determined that your information was present in the impacted email account at the time this incident. This information includes your name and [Extra1]. Although we have no evidence that any of your information was subject to actual or attempted misuse, we are notifying you in an abundance of caution.

What We Are Doing. We take this incident and the obligation to safeguard the information in our care very seriously. After discovering the suspicious activity, we promptly took steps to confirm the security of our employee email accounts and engaged third-party forensic specialists to assist in conducting a comprehensive investigation of the incident to confirm its nature, scope, and impact. Further, as part of our ongoing commitment to the privacy and security of information in our care, we are reviewing and enhancing existing policies and procedures relating to data protection and security. We have instituted additional security measures to better protect against future similar incidents. We are also notifying relevant regulatory authorities, as required.

As an added precaution, we are offering you access to credit monitoring and identity theft protection services for [Extra3] months through Experian at no cost to you. If you wish to activate these complimentary services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Your Information*. We encourage you to enroll in these services as we are unable to act on your behalf to do so.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing account statements and monitoring your free credit reports for suspicious activity and to detect errors and should report any such activity to law enforcement. You can also enroll to receive the complimentary credit monitoring services that we are offering to you. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Your Information*.

For More Information. We understand that you may have questions that are not addressed in this letter. If you have additional questions or concerns, please call our dedicated call center at **833-420-2898**, which is available from 9 AM to 11 PM Eastern Time Monday through Friday and Saturday and Sunday 11 AM to 8 PM Eastern Time (excluding major U.S. holidays). Be prepared to provide your engagement number [Engagement Number]. You may also write to CES at 4245 Sigler Road, Warrenton, VA 20187.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

Avtar Singh, PE, CCM, DBIA
President
CES Consulting LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3] 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 [Extra3] 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 [Extra3]-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 October 31, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- 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 833-420-2898 by October 31, 2023. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [Extra3]-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.¹
- **Credit Monitoring:** Actively monitors Experian file 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.²

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.

¹ Offline members will be eligible to call for additional reports quarterly after enrolling.

² 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.

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
1-888-298-0045	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; 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 <https://www.marylandattorneygeneral.gov/>.