



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

M. Alexandra Belton
Office: (267) 930-4773
Fax: (267) 930-4771
Email: abelton@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

July 11, 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 American Cleaning Institute (“ACI”) located at 1401 H Street NW, Suite 700, Washington, DC 20005, and write to notify your office of an incident that may affect certain personal information relating to seventy (70) Maryland residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, ACI 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

In March 2023, American Cleaning Institute (“ACI”) became aware of unusual activity on its network. ACI promptly began taking steps to secure its systems and commenced a thorough investigation into the full nature of the incident. Based on the investigation, ACI determined that certain records were likely copied from its network on or around March 15, 2023 as part of a cyber incident. Based on this determination, ACI undertook a diligent review of these records to determine what information was present and to whom that information related. On May 17, 2023, ACI determined that certain personal information was present in the relevant records. ACI has been working to review its internal records and determine contact information in furtherance of providing notice to those individual whose information may be involved. The efforts to determine contact information was largely completed on or around June 26, 2023.

The information that could have been subject to unauthorized access includes name, Social Security number, driver's license or state identification number, passport number, financial account information, medical information, health insurance information, and taxpayer or employer identification number. The information impacted varies by individual.

Notice to Maryland Residents

On or about July 11, 2023, ACI began providing written notice of this incident to approximately seventy (70) 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, ACI moved quickly to investigate and respond to the incident, assess the security of its systems, and identify potentially affected individuals. Further, ACI notified federal law enforcement regarding the event. ACI is notifying those who may be affected and providing access to credit monitoring services for one (1) year through Experian at no cost to these individuals.

Additionally, ACI is providing individuals with guidance on how to better protect against identity theft and fraud, including 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) 930-4773.

Very truly yours,

M. Alexandra Belton of
MULLEN COUGHLIN LLC

MABB/aml
Enclosure

EXHIBIT A



american cleaning institute®

<<Return Mail Address>>

<<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

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

<<Country>>

June 30, 2023

RE: Notice of Data Incident

Dear <<Name 1>> <<Name 2>>:

We are writing to make you aware of a recent incident that may affect some of your information. This letter provides you with information about what happened, our response to it, and the resources available to you to help protect your information, should you feel it appropriate to do so.

What Happened? In March 2023, American Cleaning Institute (“ACI”) became aware of unusual activity on our network. We promptly began taking steps to secure our systems and commenced a thorough investigation into the full nature of the incident. Based on our investigation, we determined that certain records were likely copied from our network on or around March 15, 2023 as part of a cyber incident. Based on this determination, we undertook a diligent review of these records to determine what information was present and to whom that information related. On May 17, 2023, we determined that certain personal information was present in the relevant records.

What Information Was Involved? You are receiving this letter because our investigation determined that your <<Data Elements>>, and name were present in the relevant records.

What We Are Doing. We take the security of information entrusted to us seriously and have taken diligent steps to investigate and respond to the incident. As part of our ongoing commitment to the security of information within our care, we are reviewing our existing policies and procedures regarding cybersecurity and evaluating additional safeguards to further protect against this type of incident in the future. We are also notifying you and providing you with information that may be used to help you protect your personal information from potential misuse. As an added precaution, we are offering you access to twelve (12) months of complimentary credit monitoring services. Although we are making these services available to you, we are unable to enroll you directly. Information on how to enroll may be found in the attached *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 accounts and monitoring your free credit reports for suspicious activity and to detect errors. We also encourage you to enroll in the monitoring services we are offering and to review the information contained in the attached *Steps You Can Take to Help Protect Personal Information*.

For More Information. If you have additional questions, you may reach our dedicated assistance line at 202-662-2525, Monday through Friday from 8:30 a.m. to 5:00 p.m. Eastern Time.

Sincerely,

Korie Traver

American Cleaning Institute

<https://www.cleaninginstitute.org/>

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering a complimentary twelve-month membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: September 28, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **<<Activation Code>>**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-877-288-8057 by **September 28, 2023**. Please be prepared to provide engagement number **B098171** as proof of eligibility for the identity restoration services by Experian.

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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer's name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
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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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>. ACI is located at 1401 H Street North West, Suite 700, Washington, DC 20005.