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July 17, 2023

VIA EMAIL

Attorney General Brian E. Frosh
Office of the Attorney General
St. Paul Plaza
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Fax: (410) 576-6566

Re: Notice of Data Security Incident

Dear Mr. Frosh:

Constangy, Brooks, Smith & Prophete LLP ("Constangy") represents Generations Wealth Advisors ("GWA"), based in Florida, in conjunction with the recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with the Maryland data breach notification statute.

1. Nature of the Security Incident

On February 9, 2023, GWA discovered unusual activity in its email tenant. Upon discovering this activity, GWA immediately took steps to secure its email tenant and launched an investigation with the assistance of independent cybersecurity experts to determine what happened and whether sensitive information may have been affected. As a result of this investigation, GWA learned certain personal information may have been accessed or acquired without authorization during the incident. On or about June 20, 2023, GWA completed a comprehensive review of the impacted data potentially containing personal information through which GWA identified certain personal information as potentially involved. GWA then worked diligently to identify current contact information to issue notification to relevant individuals.

2. Type of Information and Number of Maryland Resident Notified

The data sets potentially accessible by the malicious actor(s) responsible for this incident included individuals' name and Social Security numbers. On July 17, 2023, GWA notified one (1) Maryland resident of this data security incident via U.S. First-Class Mail. A sample copy of the notification letter sent to the potentially impacted individual is included with this correspondence.

3. Steps Taken Relating to the Incident

GWA has implemented additional security measures in an effort to prevent a similar incident from occurring in the future. Further, as referenced in the sample consumer notification letter, GWA has offered notified individuals 12 months of complimentary services through IDX, which include credit monitoring, dark web monitoring, a \$1 million identity fraud loss reimbursement policy, and fully-managed identity theft recovery services.

4. Contact Information

GWA remains dedicated to protecting the personal information in its possession. If you have any questions or need additional information, please do not hesitate to contact me at lnickle@constangy.com.

Best regards,
/s/ Lindsay Nickle

Very truly yours,

Lindsay Nickle of
CONSTANGY, BROOKS, SMITH & PROPHETE, LLP

Encl: Sample Adult Consumer Notification Letter

Enrollment Code: <<XXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://app.idx.us/account-creation/protect>

July 17, 2023

Subject: Notice of Data Security Incident

Dear <<First Name>> <<Last Name>>,

Generations Wealth Advisors (“GWA”) is writing to inform you of a recent data security incident that may have involved your personal information. GWA is a name used as a “doing business as” for our representatives associated with Cambridge Investment Research, Inc., a broker-dealer and Cambridge Investment Research Advisors, Inc., a registered investment advisor. GWA takes the privacy and security of all information within its possession very seriously. We are writing to notify you about the incident, provide you with information about steps you can take to help protect your personal information, and offer you the opportunity to enroll in complimentary identity protection services that GWA is making available to you.

What Happened? On or around February 9, 2023, GWA discovered unusual activity in its email tenant. Upon discovering this activity, GWA immediately took steps to secure its email tenant and launched an investigation with the assistance of independent cybersecurity experts to determine what happened and whether sensitive information may have been affected. The investigation subsequently revealed that certain personal information may have been accessed or acquired without authorization during the incident. On or about June 20, 2023, we completed a comprehensive review of the impacted data potentially containing personal information which identified your information as potentially involved. We then took steps to notify you of the incident as quickly as possible.

What Information Was Involved? The information that may have been impacted includes your name and <<Variable Text>>.

What Are We Doing? As soon as we discovered this incident, we took the steps described above. We also implemented additional security measures to help reduce the risk of a similar incident occurring in the future. We are further notifying you of this event and advising you about steps you can take to help protect your information.

In addition, out of an abundance of caution, we are offering identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection services include: <<12/24>> months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do? We encourage you to contact IDX with any questions and to enroll in free identity protection services by calling 1-800-939-4170, going to <https://app.idx.us/account-creation/protect>, or scanning the QR image and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is October 17, 2023.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information: You will find detailed instructions for enrollment on the enclosed Recommended Steps document. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter.

Please call 1-800-939-4170 or go to <https://app.idx.us/account-creation/protect> for assistance or for any additional questions you may have.

Sincerely,

Brian M. Therrell

Brian M. Therrell
Managing Partner
Generations Wealth Advisors

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Washington D.C. Attorney General

441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.