



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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July 26, 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 Gazaleh Consulting LLC (“Gazaleh”) located at P.O. Box 1378, Hightstown, New Jersey 08520, and are writing to notify your office of an incident that may affect the security of certain personal information relating to seven (7) Maryland residents. By providing this notice, Gazaleh 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 February 7, 2023, Gazaleh was alerted to suspicious activity on an employee’s email account. In response, it immediately took steps to secure its email tenant and launched an investigation to determine the nature and scope of the incident. This investigation recently concluded, and determined that between February 2, 2023 and February 7, 2023 an unknown, unauthorized actor gained access to one employee’s email account and potentially accessed and acquired certain information stored within that account.

Gazaleh then conducted a programmatic and manual review of the contents of the impacted email account in order to determine the type of protected information present at the time of the incident and to whom the information relates. On or about June 2, 2023, this review was completed, and Gazaleh then began a review of the results and its internal files to ascertain address information for individuals in which it had a direct relationship and to identify clients to whom the information belonged.

While the information varies for each individual, the information that could have been subject to unauthorized access includes name, Social Security number, driver's license number or state identification number, financial account information, date of birth, and Employer Identification number.

Notice to Maryland Residents

On or about July 26, 2023, Gazaleh provided written notice of this incident to seven (7) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit A**. Gazaleh may supplement this notification if it determines that a significant amount of additional Maryland residents will receive notice.

Other Steps Taken and To Be Taken

Upon discovering the event, Gazaleh moved quickly to investigate and respond to the incident, assess the security of Gazaleh systems, and identify potentially affected individuals. Gazaleh is also working to implement additional safeguards and training to its employees. Gazaleh is providing access to credit monitoring services for two (2) years, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Gazaleh is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Gazaleh 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.

Gazaleh is providing written notice of this incident to relevant state regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2297.

Very truly yours,

Michele Veltri of
MULLEN COUGHLIN LLC

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

6 1 1033 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



July 26, 2023

NOTICE OF [Extra1]

Dear Sample A. Sample:

Gazaleh Consulting LLC (“Gazaleh”) writes to inform you of a recent cyber incident that may impact the privacy of some of your information. While there is no indication that any identity theft or fraud has occurred as a result of this incident, this notice provides you with information about the incident, our response, and steps you may take to further protect your information against identity theft and fraud, should you determine it is appropriate to do so.

What Happened? On February 7, 2023, Gazaleh was alerted to suspicious activity on the owner, Paul Gazaleh’s, email account. In response, we immediately took steps to secure our email tenant and launched an investigation to determine the nature and scope of the incident. This investigation recently concluded, and determined that between February 2, 2023, and February 7, 2023 an unknown, unauthorized actor gained access to Paul’s email account and potentially accessed and acquired certain information stored within that account.

What Information Was Involved? Gazaleh quickly began a thorough investigation of the relevant emails and files to identify individuals with personal information that was potentially impacted. On June 2, 2023, we determined that your [Extra2][Extra4] and name were potentially accessed and acquired by an unknown, unauthorized actor as a result of this incident.

What We Are Doing. Gazaleh takes this incident and the security of information within our care very seriously. Upon discovery of this incident, we immediately launched an in-depth investigation to determine the full nature and scope of this incident and moved quickly to assess the security of our email tenant and notify potentially affected individuals. As part of our ongoing commitment to the privacy of information within our care, we are working to implement additional security measures to further protect against similar incidents in the future. We will also be notifying state regulators, as required.

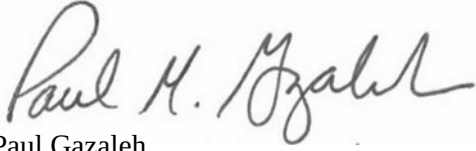
As an added precaution, we would like to offer you twenty-four (24) months of complimentary access to credit monitoring and identity restoration services through Experian. If you wish to receive these services, you must enroll by following the below enrollment instructions as we are unable to activate these services on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and to review your accounts statements and credit reports to detect errors or suspicious activity. You can find more information about obtaining a free copy of your credit report, protecting against potential identity theft and fraud, and other resources available to you in the enclosed *Steps You Can Take to Help Protect Personal Information*. You may also enroll in the credit monitoring and identity restoration services available to you; detailed instructions for enrolling in these services are enclosed.



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, or need assistance, please contact us at 1-609-443-1910 between Monday through Friday 8 am – 10 pm CST or Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays).

Sincerely,

A handwritten signature in dark ink, reading "Paul H. Gazaleh". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

Paul Gazaleh
Owner
Gazaleh Consulting LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

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** 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 1-877-890-9332 by October 31, 2023. Be prepared to provide engagement number **B097937** 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 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 ExtendCARETM:** 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.

* 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.



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 one-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
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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 1-202-727-3400; 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/>.

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.

