



MULLEN
COUGHLIN^{LLC}
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August 2, 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 Grape Creek Independent School District (“the District”) located at 8207 US Highway 87 North, San Angelo, Texas 76901, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one (1) Maryland resident. By providing this notice, the District 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 October 25, 2022, the District identified irregular activity within its computer network. In response, the District immediately took steps to secure its environment and launched an investigation to determine the nature and scope of incident. This investigation determined that between October 20 and October 25, 2022, an unknown, unauthorized actor gained access to certain District computer systems and potentially accessed and/or acquired certain files stored on accessed computer systems.

The District engaged third-party specialists to conduct a thorough review of the relevant files to identify individuals with personal information that was potentially impacted. On or about April 18, 2023, this third-party review was completed. The District then reviewed the results to identify individuals and ascertain address information for individuals. The District also engaged a third-party vendor to assist in identifying current addresses where possible. The work to identify individuals and address information recently concluded.

The information that was potentially accessed and/or acquired by an unknown, unauthorized actor as a result of this incident varies by individual but includes name, Social Security number, student number, date of birth.

Notice to Maryland Resident

On or about August 2, 2023, the District provided written notice of this incident to one (1) Maryland resident. 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, the District moved quickly to investigate and respond to the incident, assess the security of the District systems, and identify potentially affected individuals. Further, the District notified federal law enforcement regarding the event. The District is providing access to credit monitoring services for one (1) year, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

The District is providing written notice of this incident to relevant state regulators, as necessary and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

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



4145 SW Watson Avenue
Suite 400
Beaverton, OR 97005

<<Name 1>> <<Name 2>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

Enrollment Code: <<XXXXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

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

August 2, 2023

NOTICE OF <<SECURITY EVENT/DATA BREACH>>

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

Grape Creek Independent School District (the “District”) writes to inform you of a cyber incident that may impact the privacy of some of your information. While we do not have any indication of any identity theft or fraud occurring as a result of this incident, this notice provides you with additional information about the incident, our response, and steps you can take to further protect your information against identity theft and fraud, should you determine it is appropriate to do so.

What Happened? On October 25, 2022, the District identified irregular activity within our computer network. In response, we immediately took steps to secure our environment and launched an investigation to determine the nature and scope of incident. Our investigation determined that between October 20, 2022, and October 25, 2022, an unknown, unauthorized actor gained access to certain District computer systems and potentially accessed and/or acquired certain files stored on accessed computer systems.

What Information Was Involved? The District began a thorough review of the relevant files to identify individuals with personal information that was potentially impacted. This thorough investigation recently concluded, and on April 18, 2023, we determined that your name and <<Data Elements>> were potentially accessed and/or acquired by an unknown, unauthorized actor as a result of this incident. Again, at this time, we have received no indication of any identity theft or fraud occurring as a result of this incident.

What We Are Doing. The District 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 systems and notify potentially affected individuals. As part of our ongoing commitment to the privacy of information in our care, we are working to implement additional security measures to further protect against similar incidents in the future. We also notified, and will continue to notify, state regulators, as required.

As an added precaution, we would like to offer you twelve months of complimentary access to credit monitoring services through IDX, A ZeroFox Company. If you wish to receive these services, you should follow 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 Your Information*. You may also enroll in the complimentary credit monitoring 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 1-800-939-4170 between 6am and 6pm Pacific Time, Monday through Friday, excluding U.S. holidays.

Sincerely,

A handwritten signature in cursive script that reads "Angie Smetana".

Angie Smetana
Superintendent
Grape Creek Independent School District

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

1. Website and Enrollment. Scan the QR image or go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is November 2, 2023.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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.

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 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, 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. 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 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.

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 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 Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.