



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Colin D. Scanlon
Office: (267) 930-4259
Fax: (267) 930-4771
Email: cscanlon@mullen.law

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

August 3, 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 Freedom Debt Relief, LLC (“Freedom Debt Relief”) located at 1875 S. Grant Street, Suite 300, San Mateo, CA 94402, and are writing to notify your office of an incident that may affect the security of certain personal information relating to three (3) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Freedom Debt Relief 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 May 9, 2023, Freedom Debt Relief was notified of an issue wherein documents containing sensitive information related to certain clients were inadvertently made accessible to other clients on Freedom Debt Relief’s client dashboards. Upon becoming aware of the issue, Freedom Debt Relief immediately launched an investigation into the nature and scope of the incident. The investigation determined that beginning on October 27, 2022, after its client dashboard system initiated a new authorization process to display client documents, certain clients were capable of accessing historical documents that contained sensitive information related to other clients. In response, Freedom Debt Relief promptly took steps to revoke this access, correct the authorization process and review all documents that were inadvertently made accessible to clients in order to identify what information was contained within the documents and to whom the information relates. On June 28, 2023, Freedom Debt Relief completed its review and confirmed that information relating to certain individuals may have been impacted by this event. Freedom Debt Relief is not aware of any actual or attempted misuse of the potentially impacted information. The

information that could have been subject to unauthorized access includes name and Social Security number.

Notice to Maryland Residents

On August 3, 2023, Freedom Debt Relief provided written notice of this incident to three (3) 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, Freedom Debt Relief moved quickly to investigate, respond to the incident and identify potentially affected individuals. Further, Freedom Debt Relief is providing individuals whose personal information was potentially affected by this incident with access to credit monitoring services for one (1) year through Experian at no cost to the individuals.

Additionally, Freedom Debt Relief is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Freedom Debt Relief 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.

Freedom Debt Relief is providing written notice of this incident to 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) 930-4259.

Very truly yours,

Colin D. Scanlon of
MULLEN COUGHLIN LLC

CDS/jc2
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

August 3, 2023

J8031-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 NOTICE LETTER (L01)

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



NOTICE OF [VARIABLE TEXT 1]

Dear Sample A. Sample:

Freedom Debt Relief, LLC (“Freedom Debt Relief”) is writing to notify you of an incident that may have impacted the privacy of some of your information. We are providing you with information about the incident, our response, and resources we are making available to you to help protect your information should you wish to do so.

What Happened? On May 9, 2023, Freedom Debt Relief was notified of an issue wherein documents containing sensitive information related to certain clients were inadvertently made accessible to other clients on Freedom Debt Relief’s client dashboards. Upon becoming aware of the issue, Freedom Debt Relief immediately launched an investigation into the nature and scope of the incident. The investigation determined that beginning on October 27, 2022, after our client dashboard system initiated a new authorization process to display client documents, certain clients were capable of accessing historical documents that contained sensitive information related to other clients. In response, we promptly took steps to revoke this access, correct the authorization process and review all documents that were inadvertently made accessible to clients in order to identify what information was contained within the documents and to whom the information relates. On June 28, 2023, we completed our review and confirmed that information related to you may have been impacted by this event.

What Information Was Involved? Our review determined that your name, Social Security number, and creditor account number may have been impacted by this event. We have no evidence of any actual or attempted misuse of your information resulting from this event but are notifying you out of an abundance of caution.

What Are We Doing? The confidentiality, privacy, and security of information is among Freedom Debt Relief’s highest priorities. We have strict security measures in place to protect information in our care. Since being notified of this issue, we corrected the authorization process within our client dashboard system and put additional measures in place to further protect the security of information in our possession.

Additionally, we are offering you access to complimentary credit monitoring and identity protection services for 12 months through Experian. The deadline to enroll in these services is October 31, 2023. Should you wish to do so, you will need to enroll yourself as we are not able to do so on your behalf. You can find instructions on how to enroll in these services in the enclosed *Steps You Can Take to Help Protect Personal Information*.

What Can You Do? We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You may also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*. There you will also find more information on the complimentary credit monitoring and identity protection services we are making available to you.

0000001



For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have questions or need assistance, please call our dedicated assistance line at 833-420-2858 between the hours of 9:00 a.m. and 11:00 p.m., Eastern Time, Monday through Friday, and between 11:00 a.m. and 8:00 p.m. Eastern Time, Saturday and Sunday, excluding major U.S. holidays. Be prepared to provide your engagement number B099906. You may also write to Freedom Debt Relief at 1875 S. Grant Street, Suite 300, San Mateo, CA 94402.

Sincerely,

Freedom Debt Relief, LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Restoration

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 12 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 12 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 12-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 833-420-2858 by October 31, 2023. Be prepared to provide engagement number B099906 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-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.

B099906

0000001



J8031_L01

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
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; 202-727-3400; and oag.dc.gov. Freedom Debt Relief is located at 1875 S. Grant Street, Suite 300, San Mateo, CA 94402.

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/>. Freedom Debt Relief is located at 1875 S. Grant Street, Suite 300, San Mateo, CA 94402.

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.

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>. Freedom Debt Relief is located at 1875 S. Grant Street, Suite 300, San Mateo, CA 94402.

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. Freedom Debt Relief is located at 1875 S. Grant Street, Suite 300, San Mateo, CA 94402.

