



Laura K. Funk, Partner
Cybersecurity & Data Privacy Team
1201 Elm Street, Suite 2550
Dallas, Texas 75270
LFunk@constangy.com
Mobile: 248.709.9385

August 22, 2023

VIA EMAIL

Attorney General Anthony Brown
Office of the Attorney General
ATTN: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
idtheft@oag.state.md.us

Re: Notification of Data Security Incident

Dear Attorney General Brown:

Constangy Brooks Smith & Prophete LLP represents Portfolio Escrow, Inc. ("Portfolio Escrow") located in Southern California, with respect to a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident.

1. Nature of the Security Incident

On July 10, 2023, several items were physically stolen from Portfolio Escrow's office by an unknown individual. Upon learning of this theft, Portfolio Escrow immediately reported the incident to law enforcement. Portfolio Escrow then began a review of files utilized by the individuals whose devices were stolen in an effort to determine if any sensitive or personal information was potentially accessible. On August 14, 2023, Portfolio Escrow determined that personal information may have been stored on the stolen devices. The affected information varies by individual, but may have included individuals' names, Social Security numbers, driver's license or state ID numbers, passport numbers, and/or tax ID numbers.

2. Number of Maryland Residents Affected

On August 22, 2023, Portfolio Escrow notified two (2) Maryland residents of this incident via first class U.S. mail. A sample copy of the notification letter sent to impacted individuals is included with this correspondence.

3. Steps Taken Relating to the Incident

To help prevent something like this from happening again, Portfolio Escrow is implementing additional security protocols. It is also offering complimentary credit and identity protection monitoring to those individuals whose Social Security numbers may have been affected by the incident.

4. Contact Information

Portfolio Escrow remains dedicated to protecting the information in its possession. If you have any questions or need additional information, please do not hesitate to contact me at by phone 248.709.9385 or by email at lfunk@constangy.com.

Regards,

A handwritten signature in black ink, appearing to read 'L. Funk', with a long, sweeping horizontal line extending to the right.

Laura K. Funk
Partner

Enc.: Sample Consumer Notification Letter

To Enroll, Please Call:
1-800-939-4170
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: <<XXXXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

August 22, 2023

Subject: Notice of Data <<Variable 1: Security Incident/Breach>>

Dear <<First Name>> <<Last Name>>:

I am writing to inform you of a recent incident experienced by Portfolio Escrow, Inc., ("Portfolio Escrow") located in Southern California. This incident may have involved some of your personal information. We are writing to notify you of the incident, offer you complimentary credit and identity protection services, and inform you about steps you can take to help protect your information.

What Happened: On July 10, 2023, several items were physically stolen from Portfolio Escrow's office by an unknown individual. Upon learning of this theft, Portfolio Escrow immediately reported the incident to law enforcement. Portfolio Escrow then began a review of files utilized by the individuals whose devices were stolen in an effort to determine if any sensitive or personal information was potentially accessible.

On August 14, 2023, we determined that your personal information may have been stored on the stolen devices. Notably, there is no evidence that your personal information has been accessed or misused. However, out of an abundance of caution, we are notifying you about the incident and providing you resources to help you protect your personal information.

What Information Was Involved: The data that was impacted included your name and <<Variable Data 2 data elements>>.

What We Are Doing: We take this matter very seriously and are continuing to enhance our security protocols to help prevent a similar incident from occurring in the future. We are also providing you with information about steps you can take to help protect your information. As a further precaution, we are offering you <<12/24>> months of complimentary credit and identity protection services through IDX. This product helps detect possible misuse of your information and provides you with identity protection support.

What You Can Do: You can follow the recommendations included with this letter to help protect your information. In addition, you can enroll in the credit and identity protection services free of charge. To enroll, visit the link above or call the number noted above and provide the above code. The deadline to enroll in the complimentary services is November 21, 2023.

For More Information: If you have any questions regarding the incident, please call **1-800-939-4170** between 6:00 am to 6:00 pm PST.

The security of your information is a top priority for Portfolio Escrow. We take this matter very seriously, and we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. Grasska II". The signature is fluid and cursive, with a prominent "W" and "J".

William Grasska, II
President
Portfolio Escrow, Inc.
11990 San Vincente Blvd. Suite 840
Los Angeles, CA 90049

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>.

Rhode Island: The total number of individuals receiving notification of this incident is 615.