



MULLEN
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ATTORNEYS AT LAW

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November 21, 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 Middletown Home Sales, Inc. ("Middletown Homes") located at 53 Middletown Road, Fairmont, West Virginia 26554 and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) Maryland residents. By providing this notice, Middletown Homes 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 or around June 15, 2023, Middletown Homes was alerted to suspicious activity within an employee's email account. In response, Middletown Homes immediately launched an investigation to determine the nature and scope of the incident. This investigation concluded on or about July 31, 2023, and determined that an unknown, unauthorized actor gained access to the employee email account between February 26, 2023 and June 15, 2023, and potentially accessed certain information stored within that account. As a result, Middletown Homes quickly began a thorough review of the relevant emails and files to identify individuals with personal information that was potentially impacted. On or about October 4, 2023, Middletown Homes' review determined that an unknown, unauthorized actor potentially accessed certain information stored within that account.

The information that could have been subject to unauthorized access includes name and financial account information.

Notice to Maryland Residents

On or about November 21, 2023, Middletown Homes provided written notice of this incident to two (2) 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, Middletown Homes moved quickly to investigate and respond to the incident, assess the security of Middletown Homes systems, and identify potentially affected individuals. Middletown Homes is also working to implement additional security measures to further protect against similar incidents in the future. Middletown Homes 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, Middletown Homes is providing impacted individuals with guidance on how to better protect against identity theft and fraud, Middletown Homes 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.

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

MTV/jwn
Enclosure

EXHIBIT A



4145 SW Watson Avenue
Suite 400
Beaverton, OR 97005

<<First Name>> <<Last Name>>
<<Address 1>><<Address 2>>
<<City>>, <<State>> <<Zip>>

Enrollment Code: <<Enrollment Code>>
To Enroll, Scan the QR Code Below:



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

November 21, 2023

NOTICE OF SECURITY INCIDENT

Dear <<First Name>> <<LastName>>:

Middletown Home Sales, Inc. ("Middletown Homes") 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 or around June 15, 2023, Middletown Homes was alerted to suspicious activity within an employee'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 concluded on or about July 31, 2023, and determined that an unknown, unauthorized actor gained access to the employee email account between February 26, 2023, and June 15, 2023, and potentially accessed certain information stored within that account.

What Information Was Involved? Middletown Homes quickly began a thorough review of the relevant emails and files to identify individuals with personal information that was potentially impacted. On October 4, 2023, we determined that your name and <<Variable Data 1>> were potentially accessed by an unknown, unauthorized actor as a result of this incident.

What We Are Doing. Middletown Homes takes this incident and the security of information within our care very seriously. 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.

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 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 our dedicated call center between the hours of 9:00 AM and 9:00 PM Eastern Time, excluding holidays, at 1-800-939-4170.

Sincerely,

Middletown Home Sales, Inc.



STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

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. The deadline for enrollment is February 21, 2024.

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 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 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/>.