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December 1, 2023

Via E-mail

Attorney General Anthony G. Brown
200 St. Paul Place
Baltimore, MD 21202
idtheft@oag.state.md.us

RE: Paths for Families f/k/a Adoptions Together, Inc. Notice of Data Incident

Dear Attorney General Brown:

I serve as outside legal counsel to Paths for Families f/k/a Adoptions Together, Inc. ("Paths for Families"), which is an adoption and family well-being organization that partners with communities dedicated to the life-long work of building and sustaining families. Paths for Families is located at 4061 Powder Mill Road, Suite 320 Calverton, MD 20705.[1]

This correspondence is to notify you of a recent security incident involving Paths for Families that occurred from an email compromise. Paths for Families immediately took steps to address the situation. Passwords were promptly changed, and the unauthorized access was blocked.

Third-party forensic experts were engaged to investigate and remediate this incident. While the investigation is ongoing, preliminary findings indicate that an unauthorized third party obtained some data from certain systems during the incident. Paths for Families conducted a thorough review of the impacted data to determine whether sensitive information was present and to identify individuals whose information may have been involved. Through these efforts, Paths for Families determined that information regarding residents of your State may have been impacted by this incident.

In an abundance of caution, notification letters were sent via U.S. Mail to 782 residents of your State on or about December 1, 2023. The notification letters include instructions

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[1] By providing this notice, Paths for Families does not waive any rights or defenses regarding the applicability of state law, the applicability of the state's data event notification statute, or personal jurisdiction.

for activating credit monitoring services at no cost to the recipients. The PII that was potentially at risk included first and last name, social security number, and/or medical-related information. A sample notification letter is enclosed for your reference and includes:

- A description of the security event;
- Steps taken to investigate;
- Steps taken to mitigate any potential harm to consumers;
- Instructions for activating free identity theft protection services that include credit monitoring and a $1 million insurance reimbursement policy to all consumers who received notification;
- Instructions on how to place a security freeze on the recipient's consumer credit report; and
- Instructions regarding how to obtain more information about this event, etc.

Paths for Families is fully committed to protecting consumer privacy and the confidentiality of personal information. To that end, Paths for Families has a written information security policy. We will follow-up this correspondence with any forms or other documents that may need to be completed. Please contact me if you require any additional information regarding this incident.

Very truly yours,

Brad Moody

Brad Moody

Enclosure:
Sample Notification Letter

Paths *for* Families

Return Mail Processing
PO Box 999
Suwanee, GA 30024

8 1 1554 ************************************SNGLP
SAMPLE A. SAMPLE - L01
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789

December 1, 2023

Dear Sample A. Sample,

The privacy and security of the personal information provided to us is of the utmost importance. As such, on behalf of Paths for Families, f/k/a Adoptions Together, Inc. ("Paths for Families"), I am writing to notify you of a recent incident that may have involved some of your personal information.

What happened? On or about May 22, 2023, one of our organization's email accounts started showing signs of unusual activity. We investigated and promptly changed passwords and otherwise blocked the unauthorized access. Outside technical experts were also engaged to further investigate and evaluate the nature and scope of the incident.

What information was involved? While we initially did not believe that any files were impacted and issued communications reflecting that, through our subsequent investigation, we recently learned that an unauthorized third party had the means to potentially copy emails and attachments from the impacted email account. Based on those findings, we took the precaution of reviewing the files in the email account (which involved hand reviewing individual documents) in order to identify any sensitive information. From this review, we determined that some of your personal information may have been impacted, including your first and last names and [Extra1][Extra2]. While Paths for Families does not have any evidence that anyone has actually obtained and misused information, we are notifying you out of an abundance of caution.

What Are We Doing and What Can You Do? In response to this incident, we have taken measures to further secure our email platform, and will continue to evaluate additional measures we can take to harden our defenses.

While we are not aware of any instances of fraud at this time, we recommend you consider taking precautions, and remain vigilant against incidents of identity theft and fraud. As a precaution, Paths for Families encourages you to review your account statements and to monitor your personal information for suspicious activity and to detect errors.

For peace of mind, we are offering you [Extra3] of **free** credit monitoring and $1 million in identity theft insurance through Experian. **You must activate the Experian product by the activation date for it to be effective. The activation instructions are included with this notification.** We also have enclosed some additional steps that you can take to protect yourself as you deem appropriate.

For more information about this incident, please call **833-256-3158** toll-free Monday through Friday from 8 am - 8 pm Central (excluding major U.S. holidays).

In conclusion, we want you to know that we take the protection of your data seriously and encourage you to take advantage of the services offered.

Sincerely,

Paths for Families

Steps You Can Take:

Below is information on steps you can take to protect yourself if you feel necessary.

- **ACTIVATE Your FREE Experian IdentityWorks Product NOW in Three Easy Steps.** To help protect your identity, we are offering you a complimentary **[Extra3] membership** to Experian's IdentityWorks product. This product helps detect possible future misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft. IdentityWorks Alert is completely free to you and enrolling in this program will not hurt your credit score.

  STEP 1 ENSURE You Enroll By: February 10, 2024 **(Your code will not work after this date.)**

  STEP 2 VISIT the **Experian IdentityWorks website** to enroll: www.experianidworks.com/3bcredit

  STEP 3 PROVIDE Your Activation Code: **ABCDEFGHI**

If you have questions about the IdentityWorks or need an alternative to enrolling online, **please call 833-256-3158** and provide engagement **[Engagement Number].** A credit card is not required for enrollment.

Once your IdentityWorks membership is activated, you will receive the following features:

- **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, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** 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.

You must activate your membership by the Enrollment Date (noted above) by enrolling at https://www.experianidworks.com/3bcredit or calling 833-256-3158 to register your activation code above in order for this service to be activated.

Once your enrollment in IdentityWorks is complete, carefully review your credit report for inaccurate or suspicious items. If you have any questions about IdentityWorks, need help understanding something on your credit report, or suspect that an item on your credit report may be fraudulent, please contact Experian's customer team at 833-256-3158.

Additional Steps You May Wish to Take:

- **REMAIN VIGILANT: REVIEW YOUR ACCOUNT STATEMENTS & REPORT FRAUD. CHANGE PASSWORDS AND SECURITY VERIFICATION QUESTIONS & ANSWERS.** Carefully review your credit reports, debit/credit card, insurance policy, bank account and other account statements. Activate alerts on your bank accounts to notify you of suspicious activity, changing passwords/security verifications as needed - particularly if same password is used over multiple online accounts.

- **ORDER YOUR FREE ANNUAL CREDIT REPORTS.** Visit www.annualcreditreport.com or call 877-322-8228 to obtain one free copy of your credit report annually. Periodically review a copy of your credit report for discrepancies and identify any accounts you did not open or inquiries you did not authorize.

- **FREEZE YOUR CREDIT FILE.** You have a right to place a 'security freeze' on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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. Note that a security freeze generally does not apply to existing account relationships and when a copy of your report is requested by your existing creditor or its agents or affiliates for certain types of account review, collection, fraud control or similar activities. There is no charge to place or lift a security freeze. To place a security freeze on your credit report, contact each of the 3 major consumer reporting agencies -

* 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.

3 MAJOR CREDIT BUREAUS / CONSUMER REPORTING AGENCIES		
Equifax **P.O. Box 105788** **Atlanta, GA 30348** **1-800-525-6285** **www.equifax.com**	**Experian** **P.O. Box 9554** **Allen, TX 75013** **1-888-397-3742** **www.experian.comm**	**TransUnion** **P.O. Box 2000** **Chester, PA 19022** **1-800-680-7289** **www.transunion.com**

To request a freeze, you will need to provide the following:

- Your full name (including middle initial as well as Jr., Sr., II, III, etc.), Social Security Number, and Date of birth; and
- If you have moved in the past five (5) years, the addresses where you have lived over the prior five years;
- Proof of current address such as a current utility bill or telephone bill;
- A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.);
- If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

If you request a security freeze via toll-free telephone or other secure electronic means, the credit reporting agencies have 1 business day after receiving the request to place the freeze. In the case of a request made by mail, the bureaus have 3 business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within 5 business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze. To lift the security freeze to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have 3 business days after receiving a request to lift the security freeze for those identified entities or for the specified period of time. To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have 3 business days after receiving the request to remove the freeze.

- **PLACE FRAUD ALERTS ON YOUR CREDIT FILE.** As an alternative to a security freeze, you have the right to place an initial or extended fraud alert on your 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is an alert lasting 7 years. Contact the credit reporting agencies listed above to activate an alert.

- **OBTAIN INFORMATION ABOUT PREVENTING IDENTITY THEFT FROM FTC.** Go to http://www.experian.com/credit-advice/topic-fraud-and-identity-theft.html. Federal Trade Commission also provides information at www.ftc.gov/idtheft FTC hotline is 877-438-4338; TTY: 1-866-653-4261 or write to FTC, 600 Pennsylvania Ave., NW, Washington, D.C. 20580.

- **CONSIDER GETTING AN IDENTITY PROTECTION PIN:** The IRS offers Identity Protection PINs to prevent someone else from filing a tax return using your Social Security number. More information about this offering from the IRS may be found at https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin.

- **FILE YOUR TAXES QUICKLY AND SUBMIT IRS FORM 14039.** If you believe you are at risk for taxpayer refund fraud, the IRS suggests you file your income taxes quickly. Additionally, if you are an actual or potential victim of identity theft, the IRS suggests you give them notice by submitting IRS Form 14039 (Identity Theft Affidavit). This form will allow the IRS to flag your taxpayer account to alert them of any suspicious activity. Form 14039 may be found at https://www.irs.gov/pub/irs-pdf/f14039.pdf.

- **FAIR CREDIT REPORTING ACT:** You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC's list includes the following FCRA rights: (1) To receive a copy of your credit report, which must contain all the information in your file at the time of your request; (2) To receive a free copy of your credit report, at your request, once every 12 months from each of the nationwide credit reporting companies – Equifax, Experian, and TransUnion; (3) To receive a free credit report if a company takes adverse action against you (e.g. denying your application for credit, insurance, or employment), and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You are also entitled to one free report a year if you're unemployed and plan to look for a job within 60 days; if you are on welfare; or if your report is inaccurate because of fraud, including identity theft; (4) To ask for a credit score; (5) To dispute incomplete or inaccurate information; (6) To obtain corrections to your report or delete inaccurate, incomplete, or unverifiable information; (7) Consumer reporting agencies may not report outdated negative information; (8) To restrict access to your file and to require consent from you for reports to be provided to employer; (9) To limit "prescreened" offers of credit and insurance you receive based on information in your credit report; and (10) To seek damages from violators. Note - Identity theft victims and active duty military personnel have additional rights.

- **OBTAIN INFORMATION ABOUT PREVENTING IDENTITY THEFT FROM YOUR STATE ATTORNEY GENERAL.**
  - *Connecticut: You may contact and obtain information from your state attorney general at: Connecticut Attorney General's Office, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag*
  - *District of Columbia: You may contact and obtain information from your attorney general at: Office of the Attorney General for the District of Columbia, 400 6th Street, NW, Washington, DC 20001, 1-202-727-3400, databreach@dc.gov, www.oag.dc.gov*
  - *Maryland: You may contact and obtain information from your state attorney general at: Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, 1-410-528-8662; www.oag.state.md.us Consumer Hotline1-410-528-8662, or consumer@oag.state.md.us.*
  - *Massachusetts: Under Massachusetts law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: Office of the Massachusetts Attorney General, One Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ago/contact-us.html*
  - *New York: You may contact and obtain information from these state agencies: New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-6971220, http://www.dos.ny.gov/consumerprotection; and New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, https://ag.ny.gov*
  - *North Carolina: You may contact and obtain information from your state attorney general at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699, 1-919-716-6000/ 1-877-566-7226, www.ncdoj.gov*