

December 13, 2023

Via E-Mail: Idtheft@oaq.state.md.us

Attorney General Anthony Brown
Office of the Attorney General
Identity Theft Unit
200 St. Paul Place
Baltimore, MD 21202

Re: Notice of Cybersecurity Incident

Dear Attorney General Brown:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents The Fountain Group, LLC, a professional staffing firm in Tampa, FL, with respect to a cybersecurity incident that was discovered by the Fountain Group on October 11, 2023 (hereinafter, the “Incident”). Please note the Fountain Group takes the security and privacy of the information within its control seriously, and has taken steps to reduce the likelihood of a similar incident from occurring in the future. This letter will serve as a notice of the Incident and to inform you of the steps the Fountain Group has taken in response to the Incident.

1. Nature of the Incident

On October 11, 2023, the Fountain Group was made aware that its computer systems had been impacted by a ransomware incident resulting in the encryption of its computer systems (the “Incident”). Immediately upon discovery of the Incident, the Fountain Group engaged a specialized incident response vendor to conduct a forensic investigation to determine the extent and root cause of the incident. The forensic investigation concluded on November 6, 2023, which confirmed unauthorized access to the Fountain Group’s computer systems.

Upon confirming unauthorized access to its systems, the Fountain Group conducted a review of the compromised servers to determine whether personally identifiable information was maintained within the impacted computer servers for purposes of notifying those individuals whose sensitive personal information may have been impacted by the Incident. Based on its review of the data maintained within the compromised computer systems, the Fountain Group determined that the following elements of personal information may have been accessed and/or acquired by an unauthorized individual: names, dates of birth, addresses, bank account information, and Social Security numbers.

400 Poydras Street, Suite 2250 | New Orleans, LA 70130 | p 504.702.1710 | f 504.702.1715 | wilsonelser.com

Albany, NY | Atlanta, GA | Austin, TX | Baltimore, MD | Beaumont, TX | Birmingham, AL | Boston, MA | Charlotte, NC | Chicago, IL | Dallas, TX | Denver, CO
Detroit, MI | Edwardsville, IL | Garden City, NY | Hartford, CT | Houston, TX | Jackson, MS | Las Vegas, NV | London, England | Los Angeles, CA | Louisville, KY
Madison, NJ | McLean, VA | Merrillville, IN | Miami, FL | Milwaukee, WI | Nashville, TN | New Orleans, LA | New York, NY | Orlando, FL | Philadelphia, PA | Phoenix, AZ
Raleigh, NC | San Diego, CA | San Francisco, CA | Sarasota, FL | Seattle, WA | Stamford, CT | St. Louis, MO | Washington, DC | West Palm Beach, FL | White Plains, NY

To mitigate the incident, the Fountain Group mailed notification letters to the potentially affected individuals along with an offer for complimentary credit monitoring services and further instructions on how to protect their personal information. As of this writing, the Fountain Group has not received any reports of related identity theft, since the date of the Incident to the present.

2. Number of Maryland residents affected.

The Fountain Group discovered that the Incident may have resulted in unauthorized exposure of information pertaining to four (4) Maryland residents. Notification letter to these individuals were mailed on December 13, 2023, by First Class Mail. A sample copy of the notification letter is included with this letter under **Exhibit A**.

3. Steps taken in response to the Incident.

The Fountain Group is committed to ensuring the security and privacy of all personal information within its control. Upon discovery of the Incident, the Fountain Group moved quickly to investigate and respond to the Incident. Specifically, the Fountain Group engaged a specialized cybersecurity firm to conduct a forensic investigation to determine the nature and scope of the Incident. Additionally, the Fountain Group has taken steps to strengthen its security posture to reduce the likelihood of a similar incident from occurring in the future.

The Fountain Group is also offering twelve (12) months of complimentary credit monitoring and identity theft restoration services through TransUnion to potentially affected individuals residing in Maryland to help protect their identity. Additionally, the Fountain Group provided guidance on how to better protect against identity theft and fraud, including providing 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 the contact details for the Federal Trade Commission.

4. Contact Information

The Fountain Group remains dedicated to protecting the sensitive information within its control. Should you have any questions or need additional information, please do not hesitate to contact me at dominik.cvitanovic@wilsonelser.com or 504.372.6698

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

A handwritten signature in blue ink, appearing to read 'D. Cvitanovic', is positioned above the printed name.

Dominik J. Cvitanovic, Esq.

EXHIBIT A

The Fountain Group, LLC
c/o Cyberscout
1 Keystone Ave Unit 700
Cherry Hill, NJ 08003
DB-08247



Via First-Class Mail

December 13, 2023

Dear _____ :

The Fountain Group is writing to inform you of a recent data security incident that has resulted in unauthorized access to your data. While we are unaware of any fraudulent misuse of your data at this time, we are providing you with details about the incident, steps we are taking in response, and resources available to help you protect against the potential misuse of your data. Please be assured The Fountain Group takes the protection and proper use of your data very seriously.

What Happened?

On October 11, 2023, The Fountain Group detected suspicious activity in its network environment. Upon discovery of this incident, The Fountain Group promptly took steps to secure its network environment and engaged a specialized cybersecurity firm to investigate the nature and scope of the incident. As a result of the investigation, The Fountain Group learned that an unauthorized actor accessed and acquired certain files and data stored within our network.

Upon learning this, The Fountain Group launched a review of the potentially affected data to identify the individuals and information involved. On November 6, 2023, The Fountain Group identified persons whose personally identifiable information ("PII") was included within the impacted data. At this time, we have no evidence any of the information has been misused by a third party, but because information related to you was disclosed, we are notifying you out of full transparency.

What Information Was Involved?

The following data was accessed by a person not authorized to view them: name, address, date of birth, social security number, and financial account number.

Please be assured that The Fountain Group has no evidence that any payment card information was compromised as a result of this incident.

What We Are Doing?

Data security is one of our highest priorities. Upon detecting this incident, we moved quickly to initiate an investigation, which included retaining a leading forensic investigation firm who assisted in conducting an investigation and confirming the security of our network environment. We also deployed additional monitoring tools and will continue to enhance the security of our systems. We take the protection and proper use of personal information very seriously.

As part of our ongoing commitment to information privacy and the security of information, we are notifying you of this incident, and we are providing you with access to **Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score** services at no charge. These services provide you with alerts for 12 months from the date of enrollment when changes occur to your credit file. This

notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout through Identity Force, a TransUnion company specializing in fraud assistance and remediation services.

How do I enroll for the free services?

To enroll in Cyber Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/fountaingroup> and follow the instructions provided. When prompted please provide the following unique code to receive services: **WPQWWZGU**. Please note that the code is case-sensitive and will need to be entered as it appears.

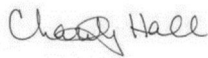
In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Once enrolled you will have 12 months of monitoring services. At the end of 12 months, the services will be deactivated. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

For More Information

Representatives are available for 90 days from the date of this letter, to assist you with questions regarding this incident, between the hours of 8:00 a.m. to 8:00 p.m. Eastern time, Monday through Friday, excluding holidays. Please call the help line at 1-800-405-6108 and supply the fraud specialist with your unique code listed above.

The Fountain Group sincerely regrets any concern or inconvenience this matter may cause and remains dedicated to ensuring the privacy and security of all information in our control.

Sincerely,



Charity Hall
Vice President of Operations

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-888-909-8872 www.transunion.com/credit-freeze
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Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Arizona residents, the Attorney General may be contacted at the Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004, 1-602-542-5025.

For Colorado residents, the Attorney General may be contacted through Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000, www.coag.gov.

For District of Columbia residents, the Attorney General may be contacted at the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Washington, DC 20001, 1-202-727-3400, www.oag.dc.gov.

For Illinois residents, the Attorney General can be contacted at 100 West Randolph Street, Chicago, IL 60601; 1-866-999-5630; www.illinoisattorneygeneral.gov.

For Iowa residents, you can report any suspected identity theft to law enforcement or to the Attorney General.

For Massachusetts residents, it is required by state law that you are informed of your right to obtain a police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For Maryland residents, you may also wish to review information provided by the Maryland Attorney General on how to avoid identity theft at <https://www.marylandattorneygeneral.gov/Pages/IdentityTheft/default.aspx>, or by sending an email to idtheft@oag.state.md.us, or calling 410-576-6491.

For New Mexico residents, state law advises you to review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. You also have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You 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 you to review your rights pursuant to the Fair Credit Reporting Act at 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, 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 / 1-800-697-1220, <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>

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov. You may also obtain information about steps you can take to prevent identify theft from the North Carolina Attorney General at <https://ncdoj.gov/protecting-consumers/protecting-your-identity/protect-yourself-from-id-theft/>.

For Oregon residents, state law advises you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For Rhode Island residents, this incident involves 1 individual in Rhode Island. Under Rhode Island 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: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov.

For Vermont Residents: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).