



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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December 28, 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 RKL, LLP (“RKL”) located at 1800 Fruitville Pike, Lancaster, PA 17601, and are writing to notify your office of an incident that may affect the security of certain personal information relating to thirty-six (36) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, RKL 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

After being alerted to suspicious activity related to a spoofed email account, RKL promptly took steps to confirm the security of its email environment and conducted a comprehensive investigation. The investigation confirmed that an employee’s email account was intermittently accessed without authorization between May 11, 2023 and June 19, 2023. Given that the investigation could not conclusively rule out access to data within the email account, in an abundance of caution, RKL then undertook a diligent review of the contents of the account to identify what information was present and to whom such information related. This review was time-intensive given the nature of the data and varied services RKL provides to its customers. Upon completion of this review, RKL then worked diligently to reconcile this information with its internal records to confirm the individuals whose information was present in the email account and the appropriate contact information for those individuals. RKL completed these efforts on December 8, 2023, and thereafter worked to begin notifying individuals as quickly as possible. The information that could have been subject to unauthorized access varies by individual but

includes name, Social Security number, driver's license number, financial account information health/medical information, and health insurance information.

Notice to Maryland Residents

On or about December 28, 2023, RKL began providing written notice of this incident to potentially affected individuals, which includes thirty-six (36) Maryland residents. Written notice is being provided in substantially the same form as the letter attached hereto as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, RKL moved quickly to investigate and respond to the incident, assess the security of RKL's email environment, and identify potentially affected individuals. RKL is also working to implement additional safeguards and training to its employees to help mitigate against the potential reoccurrence of a similar event. Further, RKL is providing access to credit monitoring services for twelve (12) months, through TransUnion, to individuals whose personal information was identified in connection with this matter, at no cost to these individuals.

Additionally, RKL is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to monitor account statements and free credit reports for suspicious activity and to detect errors. RKL is also 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.

RKL is also notifying relevant regulatory authorities, as required.

Contact Information

Should you have any questions regarding this notification or other aspects of the data event, please contact us at (267) 930-4005.

Very truly yours,



Julie Siebert-Johnson of
MULLEN COUGHLIN LLC

JSJ/kzf

Enclosure

EXHIBIT A



December 28, 2023

RE: NOTICE OF

Dear _____ :

RKL, LLP (“RKL”) is writing to notify you of a matter that may affect certain information related to you. This letter provides you with information about the event, our response, and steps you may take to help protect your information, should you feel it appropriate to do so.

What Happened? After being alerted to suspicious activity related to a spoofed email account, we promptly took steps to confirm the security of our email environment and conducted a comprehensive investigation. The investigation confirmed that an employee’s email account was intermittently accessed without authorization between May 11, 2023 and June 19, 2023. Given that the investigation could not conclusively rule out access to data within the email account, in an abundance of caution, we then undertook a diligent review of the contents of the account to identify what information was present and to whom such information related. This review was time-intensive given the nature of the data and services RKL provides to its customers. Upon completion of this review, we then worked diligently to reconcile this information with our internal records to confirm the individuals whose information may have been affected and the appropriate contact information for those individuals. We completed this review on _____, and thereafter began notifying potentially impacted individuals as quickly as possible. You are receiving this notification because we determined that certain information related to you was present and therefore accessible in connection with this matter.

What Information Was Involved? Our investigation identified the following information related to you: name and _____.

What We Are Doing. We take this matter and the security of personal information in our care very seriously. In response to this matter, we promptly took steps to secure the account, including changing the password and token session for the email account, and conducted a diligent investigation to confirm the full nature and scope of the event. Further, as part of our ongoing commitment to the privacy and security of information in our care, we are reviewing and, where necessary, enhancing our policies and procedures related to data security, and additional workforce training is being conducted to reduce the likelihood of a similar future event. We are also notifying relevant regulatory authorities, as required.

As an added precaution we are offering you access to _____ of credit monitoring and identity theft protection services from Cyberscout through Identity Force, a TransUnion company at no cost to you. If you wish to activate these services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Personal Information*. We encourage you to enroll in these services as we are unable to act on your behalf to do so.

What You Can Do. Receipt of this letter does not mean you are a victim of identity theft or fraud. However, 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 can also enroll to receive the complimentary monitoring services that we are offering to you. Please also review the attached *Steps You Can Take to Help Protect Personal Information* for additional information and resources.

For More Information. We understand that you may have questions that are not addressed in this notice. If you have questions or concerns, please call our dedicated assistance line at 1-800-405-6108, which is available between the hours of 8:00 a.m. to 8:00 p.m. Eastern time, Monday through Friday, excluding holidays. We take this matter very seriously and sincerely regret any inconvenience or concern it may cause you.

Sincerely,

RKL, LLP

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Offered Monitoring Services

In response to the incident, 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 twelve 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 Credit Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/rkl> and follow the instructions provided. When prompted please provide the following unique code to receive services:

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. 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.

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.

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/>. RKL is located at 1800 Fruitville Pike Lancaster, PA 17601.

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>.

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.