



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

Colin D. Scanlon
Office: (267) 930-4259
Fax: (267) 930-4771
Email: cscanlon@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

January 22, 2024

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 Ricardo Defense, Inc. ("Ricardo") located at 300 E. Big Beaver Rd., Suite 180, Troy, MI 48083, and are writing to notify your office of an incident that may affect the security of certain personal information relating to twenty-seven (27) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Ricardo 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 October 23, 2023, Ricardo discovered suspicious activity on its network. Ricardo immediately took steps to secure its systems and initiated an investigation into the nature and scope of the event with the assistance of third-party forensic specialists. The investigation determined that Ricardo's network was subject to unauthorized access between October 16, 2023 and October 23, 2023, and that certain files were acquired by an unknown actor while on the network. In response, Ricardo undertook a thorough and time consuming review of the data determined to be at risk to assess the type of information at issue and to whom that information relates. Ricardo completed the review on December 4, 2023, and confirmed that the files contained sensitive information related to some Maryland residents. Ricardo then promptly took steps to locate necessary contact information to notify affected individuals. The information that could have been subject to unauthorized access includes name, Social Security number, date of birth, driver's license number, and financial account information.

Notice to Maryland Residents

On January 22, 2024, Ricardo provided written notice of this incident to twenty-seven (27) 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, Ricardo moved quickly to investigate and respond to the incident, assess the security of its systems, and identify potentially affected individuals. Further, Ricardo notified federal law enforcement of the event and implemented additional safeguards. Ricardo is providing individuals whose personal information was potentially affected by this incident access to credit monitoring services for twelve (12) months, through Experian, at no cost to the individuals.

Additionally, Ricardo is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Ricardo is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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. Ricardo is providing written notice of this incident to regulators as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4259.

Very truly yours,



Colin D. Scanlon of
MULLEN COUGHLIN LLC

CDS/jh2
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

January 22, 2024

K7010-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 ADULT
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



Notice of Data [Breach / Event]

Dear Sample A. Sample:

Ricardo Defense, Inc. (“Ricardo” or “We”) writes to notify you of an incident that may affect the privacy of some of your information. This letter provides details of the incident, our response, and steps you may take to better protect against possible misuse of your information should you feel it appropriate to do so.

What Happened? On October 23, 2023, Ricardo discovered suspicious activity on its network. We immediately took steps to secure our systems and initiated an investigation into the nature and scope of the event with the assistance of third-party forensic specialists. The investigation determined our network was subject to unauthorized access between October 16, 2023 and October 23, 2023, and that certain files were acquired by an unknown actor while on the network. In response, we undertook a thorough and time consuming review of the data determined to be at risk to assess the type of information at issue and to whom that information relates. We completed the review on December 4, 2023, and confirmed that the files contained sensitive information related to you. We then promptly took steps to locate necessary contact information and provide this notification.

What Information Was Involved? The information impacted by this event may include some or all of the following, your: name, Social Security number, date of birth, driver’s license number, and financial account information. Ricardo is not aware of any fraud or identity theft related to this event.

What We Are Doing. The confidentiality, privacy, and security of information in our care is among our highest priorities. Upon discovery of the suspicious activity, we immediately commenced an investigation to confirm the nature and scope of the incident. We also reported the event to law enforcement, and took steps to implement additional safeguards related to data privacy and security.

Additionally, we are offering you access to credit monitoring and identity theft protection services for 12 months through Experian at no cost to you. The deadline to enroll in these services is April 1, 2024. A description of services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Help Protect Personal Information*. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services.

What You Can Do. In addition to enrolling in the credit monitoring being offered to you, 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. You may also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*. There you will also find more information regarding ways to protect and monitor your information.

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For More Information. If you have questions, you can call our dedicated assistance line at 833-541-1595, which is available Monday through Friday from 9:00 am to 9:00 pm Eastern (excluding U.S. holidays). Please be prepared to provide engagement number B112929. You can also write to us at Ricardo Defense, Inc., 300 E. Big Beaver Rd., Suite 180, Troy, MI 48083.

We regret any inconvenience or concern this incident may cause you.

Sincerely,

Ricardo Defense, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Restoration

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 12 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 12-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by April 1, 2024** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/plus>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 833-541-1595 by April 1, 2024. Be prepared to provide engagement number B112929 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 file for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** 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.

* 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.



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 your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one 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 your name without your consent. However, you should be aware that using a credit 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. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide 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 you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, 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

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. 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 and your 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 marylandattorneygeneral.gov.

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.

