



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

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

January 24, 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 the Center for Urban Community Services (“CUCS”) located at 198 East 121 Street, 6th Floor, New York, NY 10035, and are writing to notify your office of an incident that may affect the security of certain personal information relating to seven (7) Maryland residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CUCS 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 September 9, 2023, CUCS was alerted to suspicious activity related to its environment. CUCS immediately launched an investigation into this issue and worked with subject matter specialists to determine the full nature and scope of the event. This investigation determined that an unknown individual gained access to certain CUCS systems from September 4, 2023, to September 10, 2023. Furthermore, the investigation revealed that certain personally identifiable data was acquired by the unknown actor within that time frame. Although CUCS identified and investigated suspicious activity on or around September 9, 2023, data acquisition was not confirmed at that time. CUCS then proceeded to conduct a thorough and time-intensive review of the impacted information to ensure that it identified individuals with information potentially at risk.

The information that could have been subject to unauthorized access includes name, Social Security number, and date of birth. Financial account information, and passport number may have been impacted.

Notice to Maryland Residents

On or about January 24, 2024, CUCS provided written notice of this incident to seven (7) 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, CUCS moved quickly to investigate and respond to the incident, assess the security of CUCS systems, and identify potentially affected individuals. Further, CUCS notified federal law enforcement regarding the event. CUCS is also working to implement additional safeguards and training to its employees. CUCS is providing access to credit monitoring services for two (2) years, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, CUCS 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. CUCS 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.

CUCS is providing written notice of this incident to relevant state and federal 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) 930-4777.

Very truly yours,

Brian F. Fox of
MULLEN COUGHLIN LLC

BFF/hkl
Enclosure

EXHIBIT A



P.O. Box 989728
West Sacramento, CA 95798-9728

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Enrollment Code: <<Enrollment Code>>

To Enroll, Scan the QR Code Below:



Or Visit:

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

January 24, 2024

NOTICE OF <<DATA BREACH/SECURITY EVENT>>

Dear <<First Name>> <<Last Name>>:

The Center for Urban Community Services (“CUCS”) is writing to notify you of an incident that may affect the privacy of some of your information. We take this incident very seriously and are providing details of the incident and the resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

What Happened? On or around September 9, 2023, CUCS was alerted to suspicious activity related to its environment. CUCS immediately launched an investigation into this issue and worked with subject matter specialists to determine the full nature and scope of the event.

This investigation determined that an unknown individual gained access to certain CUCS systems from September 4, 2023, to September 10, 2023. Furthermore, the investigation revealed that certain personally identifiable data was acquired by the unknown actor within that time frame. Although CUCS identified and investigated suspicious activity on or around September 9, 2023, data acquisition was not confirmed at that time. We then proceeded to conduct a thorough and time-intensive review of the impacted information to ensure we identified individuals with information potentially at risk. Through the review, on or about December 19, 2023, we determined that your personal information was potentially impacted.

What Information Was Involved? The type of information that was acquired varies by individual and could include one or more of the following: name, Social Security number, driver’s license number if provided to CUCS, and passport number if provided to CUCS. Your bank account information was also impacted if you received your paycheck via direct deposit.

What We Are Doing. CUCS takes the confidentiality, privacy, and security of information in its care seriously. Upon discovery, CUCS secured its systems and launched an investigation with third party forensic specialists to determine the nature and scope of the potentially impacted data.

CUCS notified federal law enforcement and is reporting this incident to relevant state and federal regulators. As an added precaution, we are also offering you complimentary access to 24 months of credit monitoring and identity theft restoration services, through IDX. Please review the instructions contained in the attached *Steps You Can Take To Help Protect Your Personal Information* for additional information on these services.

What You Can Do. While CUCS has no evidence to indicate identity theft or fraud occurred as a result of this incident, CUCS encourages impacted individuals to review *Steps You Can Take to Help Protect Your Personal Information*, which is included below.

For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have additional questions, or need assistance, please call 1-888-925-2072 Monday through Friday from 9:00 am to 9:00 pm Eastern Time. You may also write to CUCS at 198 East 121st Street, New York, NY 10035.

Sincerely,
Center for Urban Community Services

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit and Identity Monitoring

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. Please note the deadline to enroll is April 24, 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 1-888-925-2072 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

4. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever 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 some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

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 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
888-298-0045	1-888-397-3742	833-395-6938
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 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/>.

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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. Fees may be required to be paid to the consumer reporting agencies. There are approximately 2 Rhode Island residents that may be impacted by this event.



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Brian F. Fox
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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

July 3, 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: Supplementary Notice of Data Event

To Whom It May Concern:

As you are aware, we represent the Center for Urban Community Services (“CUCS”) and are writing to provide an update on the previously reported potential cybersecurity incident. By providing this notice, CUCS 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 21, 2024, CUCS concluded its investigation, which determined information related to forty-two (42) Maryland residents was potentially accessed by an unknown actor between September 4, 2023, and September 10, 2023. On or about July 3, 2024, CUCS provided written notice of this incident to potentially affected Maryland residents. CUCS is also providing 24 months of complimentary credit monitoring through IDX to all notified individuals. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***. Additionally, CUCS is working to implement additional safeguards and training to its employees to reduce the likelihood of similar future incidents.

Office of the Attorney General

July 3, 2024

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Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4777.

Very truly yours,

Brian F. Fox of
MULLEN COUGHLIN LLC

BFF/hkl
Enclosure

EXHIBIT A



Rebuilding lives together

PO Box 480149
Niles, IL 60714

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



July 3, 2024

NOTICE OF <<Variable Header>>

Dear <<Name 1>> <<Name 2>>:

The Center for Urban Community Services (“CUCS”) is writing to notify you of a data security incident that may affect the privacy of some of your information. We take this incident very seriously and are providing details of the incident and the resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

What Happened? On or around September 9, 2023, CUCS was alerted to suspicious activity related to its network environment. CUCS immediately launched an investigation into this issue and worked with subject matter specialists to determine the full nature and scope of the event.

This investigation determined that an unknown individual gained unauthorized access to certain CUCS systems from September 4, 2023, to September 10, 2023. Furthermore, the investigation revealed that certain personally identifiable data was acquired by the unknown actor within that time frame. We then proceeded to conduct a thorough and time-intensive review of the impacted information to ensure we identified individuals with information potentially at risk. As a result of the review, on or about June 21, 2024, we determined that your personal information was potentially impacted.

What Information Was Involved? The type of information that was acquired varies by individual and could include one or more of the following: your name, and <<Variable Data 3 (Impacted Data elements)>>.

What We Are Doing. CUCS takes the confidentiality, privacy, and security of information in its care seriously. Upon discovery, CUCS secured its systems and launched an investigation with third party forensic specialists to determine the nature and scope of the potentially impacted data.

CUCS notified federal law enforcement and is reporting this incident to relevant state and federal regulators. CUCS is also providing twenty-four (24) months of complimentary credit monitoring services to you through IDX. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Personal Information* for additional information on these services.

What You Can Do. While CUCS has no evidence to indicate identity theft or fraud has occurred or is likely to occur as a result of this incident, CUCS encourages you to review the attached *Steps You Can Take to Help Protect Your Personal Information*.

For More Information. We understand you may have questions or concerns about the incident that are not addressed in this letter. If you have additional questions, or need assistance, please call 1-888-461-3353 Monday through Friday from 9:00 am to 9:00 pm Eastern Time, excluding holidays. You may also write to CUCS at 198 East 121st Street, New York, NY 10035.

We regret that this has happened and any concern or inconvenience this may have caused you.

Sincerely,

Center for Urban Community Services

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring

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. Please note the deadline to enroll is October 3, 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 1-888-461-3353 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

4. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

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.

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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 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 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/>.

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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. Fees may be required to be paid to the consumer reporting agencies. There are approximately 11 Rhode Island residents that may be impacted by this event.