



February 8, 2024

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Via E-Mail: Idtheft@oag.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 Data Security Incident

Dear Attorney General Brown:

Wilson Elser Moskowitz Edelman and Dicker, LLP (“Wilson Elser”) represents Transition Finance Strategies, LLC d/b/a Blue Ridge ESOP Associates (“Blue Ridge”), located at 154 Hansen Road, Suite 102, Charlottesville, VA 22911, with respect to a data incident that was discovered by Blue Ridge on January 2, 2024 (hereinafter, the “Incident”). Please note Blue Ridge takes the security and privacy of the information within its control seriously, and has taken steps to prevent 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 Blue Ridge has taken in response to the Incident.

1. Nature of the Incident

In November of 2023, Blue Ridge mailed 2022 ESOP statements to its participants. On January 2, 2024, Blue Ridge was notified that a significant number of envelopes were returned as undeliverable. Upon further investigation, Blue Ridge discovered that the mailing labels for the returned envelopes inadvertently reflected the participant’s full Social Security number following the zip code. Reasons for the error were investigated and resolved by Blue Ridge.

Based on this Incident and corresponding investigation, Blue Ridge notified those individuals whose information was impacted along with an offer of complimentary credit monitoring and identity theft protection services. As of this writing, Blue Ridge has not received any reports of related identity theft, since the date of the Incident to the present.

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2. Number of Maryland residents affected.

Blue Ridge discovered that the Incident may have resulted in unauthorized exposure of information pertaining to seven (7) Maryland residents. Notification letters to the individuals were mailed on January 29, 2024, 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.

Blue Ridge is committed to ensuring the security and privacy of all personal information within its control, and is taking steps to prevent a similar incident from occurring in the future. Upon discovery of the Incident, engaged breach counsel to provide guidance and ensure that the appropriate steps are taken in response to the Incident. Additionally, Blue Ridge has taken steps to strengthen its security posture to prevent a similar event from occurring again in the future.

Blue Ridge 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, Blue Ridge 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 and Federal Trade Commission, information on how to obtain a free credit report, and a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports.

4. Contact Information

Blue Ridge 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 karen.bridges@wilsonelser.com or 312.706.3023.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Karen Bridges

Karen I. Bridges

EXHIBIT A



BLUE RIDGE ESOP ASSOCIATES

The Leader in Professional ESOP Administration

<Return Address>

Via First-Class Mail

January __, 2024

<First Name> <Last Name>

<Address1> <Address2>

<City>, <State> <Zip>

Re: Data Security Incident

Dear <First Name> <Last Name>,

Transition Finance Strategies., LLC (“Blue Ridge”) is writing to inform you of a recent data security incident that may have resulted in an unauthorized access to your sensitive personal information. While we are unaware of any fraudulent misuse of your personal information 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 information.

What Happened?

On January 2, 2024, Blue Ridge received notification of an unusual mailing issue. Blue Ridge immediately began investigating the issue. That investigation found that some individuals had personally identifiable information inadvertently included on the mailing address. Reasons for the error were found and resolved.

Based on this investigation, Blue Ridge prepared the list of individuals to notify.

What Information Was Involved?

Although Blue Ridge has no evidence that any sensitive information has been misused by third parties as a result of this incident, we are notifying you out of an abundance of caution and for purposes of full transparency. Based on the investigation, the following information related to you may have been subject to unauthorized access: name; address; social security number.

What We Are Doing

Data privacy and security is among Blue Ridge’s highest priorities, and we are committed to doing everything we can to protect the privacy and security of the personal information in our care. Since the discovery of the incident, Blue Ridge moved quickly to investigate, respond, and confirm the security of our systems. Specifically, Blue Ridge enhanced the security measures, and took steps and will continue to take steps to mitigate the risk of future harm.



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In light of 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 (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.

What You Can Do

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious or unauthorized activity. Additionally, security experts suggest that you contact your financial institution and all major credit bureaus to inform them of such a breach and then take whatever steps are recommended to protect your interests, including the possible placement of a fraud alert on your credit file. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, to learn more about how to protect against the possibility of information misuse.

To enroll in Credit Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/brtcllcus> and follow the instructions provided. When prompted please provide the following unique code to receive services: <<Unique Code>>.

In order for you to receive the monitoring services described above, you must enroll within ninety (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 eighteen (18). 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.

We would like to reiterate that, at this time, there is no evidence that your information was misused. However, we encourage you to take full advantage of the services offered.

For More Information

Representatives are available for ninety (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 be prepared to supply the fraud specialist with your unique code listed within.

Blue Ridge 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,

SIGNATURE



BLUE RIDGE ESOP ASSOCIATES

The Leader in Professional ESOP Administration

<<Bill Yoerger>>

<<CEO>>

<<Blue Ridge ESOP Associates>>