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426 W. Lancaster Avenue, Suite 200
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February 28, 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 PGAL, Inc. located at 3131 Briarpark Drive, Suite 200, Houston, TX 77042 and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, PGAL 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 January 4, 2024, PGAL discovered suspicious activity in its network. In response, PGAL immediately took steps to secure its systems and launched an investigation into the nature and scope of the event with the assistance of its third-party managed services provider. The investigation determined that an unauthorized actor gained access to certain systems on PGAL's network and acquired certain files and folders on January 4, 2024. PGAL identified the affected files and undertook a comprehensive review of the files to identify the type of information contained therein, and to whom the information relates. On January 31, 2024, PGAL completed this thorough review process and identified that information pertaining to certain current and former employees and their dependents were present in the affected files. PGAL does not have evidence of any actual or attempted fraudulent misuse of information as a result of this incident.

The information affected by this event for Maryland residents includes name and Social Security number.

Notice to Maryland Residents

On February 28, 2024, PGAL provided written notice of this incident to two (2) 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, PGAL moved quickly to investigate and respond to the incident, assess the security of PGAL systems, and identify potentially affected individuals. PGAL is also working to implement additional safeguards and training to its employees. PGAL is providing access to credit monitoring services for one (1) year through Experian to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, PGAL 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. PGAL is 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4788.

Very truly yours,

Paul T. McGurkin, Jr. of
MULLEN COUGHLIN LLC

PTM/jc2
Enclosure

EXHIBIT A



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

February 28, 2024

K9131-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01

APT ABC

123 ANY STREET

ANYTOWN, FC 1A2 B3C

COUNTRY



NOTICE OF [Extra1]

Dear Sample A. Sample,

PGAL is writing to notify you of an incident that impacted the privacy of some of your personal information. PGAL takes this incident very seriously and is providing you with information about the incident, our response to it, and resources we are making available to you to help protect your information, should you feel it appropriate to do so. Please note that this letter relates to the same incident we notified you of on January 17, 2024, via email.

What Happened? On January 4, 2024, PGAL discovered suspicious activity in our network. In response, we immediately took steps to secure our systems and launched an investigation into the nature and scope of the event with the assistance of our third-party managed services provider. The investigation determined that an unauthorized actor gained access to certain systems on our network and acquired certain files and folders on January 4, 2024. We identified the affected files and undertook a comprehensive review of the files to identify the type of information contained therein, and to whom the information relates. On January 31, 2024, we completed this thorough review process and identified that information pertaining to certain current and former employees and their dependents were present in the affected files, including you.

What Information Was Involved? Our review determined that the following types of information were present in the files that were acquired by the unauthorized actor: your [Extra2]. Please note that PGAL does not have evidence of any actual or attempted fraudulent misuse of information as a result of this incident.

What Are We Doing? The confidentiality, privacy, and security of personal information within our care is among our highest priorities, and we have strict security measures in place to protect information in our care. Upon becoming aware of this incident, we immediately took steps to secure our systems and performed a full investigation. We are implementing additional security measures to further protect against similar incidents moving forward.

Additionally, we are offering credit monitoring and identity theft protection services for [Extra3] months through Experian, at no cost to you. **The deadline to enroll in these services is April 30, 2024.** If you are interested in enrolling in these services, please email PRHernandez@pgal.com before the deadline date and we will provide you with a unique code and instructions on how to enroll in these services. Please note that you will not be automatically enrolled in these services. Should you wish to do so, you will need to enroll yourself in these services, as PGAL is not able to do so on your behalf.



What Can You Do? 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 may also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions or need assistance, please call our dedicated assistance line at 1-833-918-1255 between the hours of 9:00am - 9:00pm, Eastern Time, Monday through Friday (excluding major U.S. holidays). Be prepared to provide engagement number B116785. You may also write to PGAL at 3131 Briarpark Drive, Suite 200, Houston, Texas 77042.

We sincerely regret any inconvenience or concern this incident may cause you. Protecting your information is very important to us, and we remain committed to safeguarding the information in our care.

Sincerely,



Jeff Gerber
Chief Executive Officer

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

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 may need to provide the following information, depending on whether the request is made online, by phone, or by mail:

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-

0000001



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, DC 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; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, you 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 bureaus 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 violator. 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 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.