

**Dominic A. Paluzzi**  
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**VIA EMAIL ([Idtheft@oag.state.md.us](mailto:Idtheft@oag.state.md.us))**

Office of the Maryland Attorney General  
Attn: Security Breach Notification  
200 St. Paul Place  
Baltimore, MD 21202

**Re: First Bank of the Lake – Incident Notification**

Dear Sir or Madam:

McDonald Hopkins represents First Bank of the Lake. I am writing to provide notification of an incident that may affect the security of personal information of approximately one (1) Maryland resident. By providing notice, First Bank of the Lake does not waive any rights or defenses regarding the applicability of Maryland law or personal jurisdiction.

First Bank of the Lake recently learned that on October 8, 2023, an unauthorized actor gained access to and acquired emails from an employee email account that contains personal information. Upon learning of this issue, First Bank of the Lake secured the impacted email account and commenced a prompt and thorough investigation. First Bank of the Lake immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to analyze the extent of any compromise of the email account and the security of the emails and attachments contained within them. First Bank of the Lake devoted considerable time and effort to determine what information was contained in the affected email account. After an extensive forensic investigation and manual document review, First Bank of the Lake discovered on February 5, 2024 that the email account that was accessed by the unauthorized party may have included personal information, including resident's full name and Social Security Number.

First Bank of the Lake has no reason to believe that any personal information will be misused as a result of this incident. Nevertheless, out of an abundance of caution, First Bank of the Lake wanted to inform you (and the affected resident) of the incident and to explain the steps that it is taking to help safeguard the affected resident against identity fraud. First Bank of the Lake is providing the affected resident with written notification of this incident commencing on or about February 29, 2024 in substantially the same form as the letter attached hereto. First Bank of the Lake is also offering the affected resident a complimentary one-year membership with a credit monitoring service. First Bank of the Lake is advising the affected resident to always remain vigilant in reviewing financial account statements for fraudulent or irregular activity on a regular basis. First Bank of the Lake is advising the affected resident about the process for placing fraud alerts and/or security freezes on their credit file and obtaining a free credit report. The affected

resident is also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At First Bank of the Lake, protecting the privacy of personal information is a top priority. First Bank of the Lake is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. First Bank of the Lake continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions regarding this notification, please contact me at (248) 220-1356 or [dpaluzzi@mcdonaldhopkins.com](mailto:dpaluzzi@mcdonaldhopkins.com). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dom Paluzzi", is centered below the word "Sincerely,".

Dominic A. Paluzzi

Encl.



Return to IDX  
4145 SW Watson Ave  
Suite 400  
Beaverton, OR 97005

Enrollment Code: [REDACTED]

To Enroll, Scan the QR Code Below:



Or Visit:

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

February 29, 2024

Dear [REDACTED]

The privacy and security of the personal information we maintain is of the utmost importance to First Bank of the Lake. We are writing with important information regarding a recent data security incident that involved some of your information. We want to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

First Bank of the Lake recently learned that on October 8, 2023 an unauthorized actor gained access to and acquired emails from an employee email account that contains personal information.

What We Are Doing.

Upon learning of this issue, we contained and secured the threat and commenced a prompt and thorough investigation. As part of our investigation, we have worked very closely with external cybersecurity professionals experienced in handling these types of incidents. After an extensive forensic investigation and manual document review, we discovered on February 5, 2024 that the impacted email account and acquired emails contained a limited amount of your personal information.

What Information Was Involved.

The impacted email account may have contained some of your personal information, specifically your full name and [REDACTED]

What You Can Do.

We have no knowledge that your information has been or will be misused as a direct result of this incident. Out of an abundance of caution and to protect you from potential misuse of your information, we are offering identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection services include: <<12 months/24 months>> of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised. We encourage you to contact IDX with any questions and to enroll in free identity

protection services by scanning the QR image, calling 1-800-939-4170, or going to <https://app.idx.us/account-creation/protect>, and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 8:00 a.m. to 8:00 p.m. Central Time (except major US holidays). Please note the deadline to enroll is May 29, 2024.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a fraud alert and/or security freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

*For More Information.*

We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this incident, please call our toll-free response line at 1-800-939-4170. The response line is available Monday through Friday, 8:00 a.m. to 8:00 p.m. Central Time (except major US holidays).

Sincerely,

[REDACTED]

[REDACTED]

First Bank of the Lake

[REDACTED]

**– OTHER IMPORTANT INFORMATION –**

**1. Enrolling in Complimentary <<12 months/24 months>> Credit Monitoring.**

**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.

**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.

**Telephone.** Contact IDX at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

**2. Placing a Fraud Alert on Your Credit File.**

Whether or not you choose to use the complimentary <<12 months/24 months>> credit monitoring services, we recommend that you place an initial one-year “Fraud Alert” on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

***Equifax***

P.O. Box 105069

Atlanta, GA 30348-5069

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

(800) 525-6285

***Experian***

P.O. Box 9554

Allen, TX 75013

<https://www.experian.com/fraud/center.html>

(888) 397-3742

***TransUnion***

Fraud Victim Assistance Department

P.O. Box 2000

Chester, PA 19016-2000

<https://www.transunion.com/fraud-alerts>

(800) 680-7289

**3. Consider Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a “Security Freeze” be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

***Equifax***

P.O. Box 105069

Atlanta, GA 30348-5069

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

(800) 525-6285

***Experian***

P.O. Box 9554

Allen, TX 75013

<https://www.experian.com/fraud/center.html>

(888) 397-3742

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P.O. Box 2000

Chester, PA 19016-2000

<https://www.transunion.com/fraud-alerts>

(800) 680-7289

In order to place the security freeze, you’ll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

#### **4. Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

#### **5. Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If this notice letter states that your financial account information and/or credit or debit card information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect your account, including whether you should close your account or obtain a new account number.

**Maryland Residents:** You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, <https://www.marylandattorneygeneral.gov/>, Telephone: 888-743-0023.

**New York Residents:** You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; <https://ag.ny.gov/consumer-frauds-bureau/identity-theft>; Telephone: 800-771-7755.

**North Carolina Residents:** You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov/](http://www.ncdoj.gov/), Telephone: 877-566-7226 (Toll-free within North Carolina), 919-716-6000.

**Oregon Residents:** You may obtain information about preventing identity theft from the Oregon Attorney General's Office: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://www.doj.state.or.us/), Telephone: 877-877-9392.

**New Mexico Residents:** You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit [www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf](http://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf) or [www.ftc.gov](http://www.ftc.gov).

*In Addition, New Mexico Consumers Have the Right to  
Obtain a Security Freeze or Submit a Declaration of Removal*

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number, password, or similar device provided by the consumer reporting agency;
2. Proper identification to verify your identity; and
3. Information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. You may contact these agencies using the contact information provided above.