



Richard Goldberg, Partner & Vice-Chair  
Cybersecurity & Data Privacy Team  
1650 Market Street, Suite 3600  
Philadelphia, PA 19103  
rgoldberg@constangy.com  
Mobile: 917.744.1760

April 4, 2024

**VIA EMAIL**

Attorney General Anthony Brown  
Office of the Attorney General  
ATTN: Security Breach Notification  
200 St. Paul Place  
Baltimore, MD 21202  
idtheft@oag.state.md.us

**Re: Notification of Data Security Incident**

Dear Attorney General Brown:

Constangy Brooks Smith & Prophete LLP represents Bob Ciasulli Auto Group ("BCAG"), headquartered in Little Falls, New Jersey, with respect to a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident.

**1. Nature of the Security Incident**

On March 28, 2024, BCAG determined that notification should be provided to individuals as a result of a data exposure which occurred at a different company. On November 30, 2023 BCAG received an email from Paycor, inc. ("Paycor"), which stated that Paycor had experienced a data security incident. Paycor was the payroll vendor for BCAG. Paycor sent BCAG a list of those affected by this incident. BCAG immediately began an investigation and determined that certain personal information was identified within the potentially affected data. Paycor declined to notify individuals of this incident. As part of BCAG's ongoing commitment to safeguarding the personal information of current and former employees, BCAG took steps to notify the potentially involved individuals. On March 28, 2024, BCAG learned the names and locations of these individuals

The affected information varies by individual, but may have included individuals' names, Social Security numbers, and driver's license numbers.

**2. Number of Maryland Residents Affected**

On April 4, 2024, BCAG notified one (1) Maryland resident of this incident via first class U.S. mail. A sample copy of the notification letter sent to impacted individuals is included with this correspondence.

**3. Steps Taken Relating to the Incident**

To help prevent a similar incident from occurring in the future, BCAG has implemented updated vendor selection policies and additional security measures to minimize the risk of a similar incident occurring in the future. It is also offering complimentary credit and identity protection monitoring to those individuals whose Social Security numbers may have been affected by the incident.

#### 4. Contact Information

BCAG takes seriously its responsibility to protect the security of the information it maintains. If you have any questions or need additional information, please do not hesitate to contact me at 917.744.1760 or by email at [rgoldberg@constangy.com](mailto:rgoldberg@constangy.com).

Sincerely,

A handwritten signature in cursive script that reads "Richard Goldberg".

Richard Goldberg  
Partner & Vice Chair

Enc.: Sample Consumer Notification Letter

**BCAG**

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

<<First Name>> <<Last Name>>  
<<Address 1>>  
<<Address 2>>  
<<City>>, <<State>> <<Zip Code>>

Enrollment Code: <<XXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

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

April 4, 2024

Subject: Notice of Data <<Variable Data 2>>

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

I am writing to inform you of a data security incident that may have affected your personal information. At Bob Ciasulli Auto Group ("BCAG"), we take the privacy and security of personal information very seriously. This is why we are informing you of the incident, providing you with steps you can take to protect your personal information, and offering you complimentary credit monitoring and identity protection services.

**What Happened?** On November 30, 2023, BCAG received an email from Paycor, inc. ("Paycor"), which stated that Paycor had experienced a data security incident. Paycor is the payroll vendor for BCAG. Paycor sent BCAG a list of those affected by this incident. BCAG immediately began an investigation and we have determined that some of your personal information was identified as being contained within the potentially affected data. Paycor has declined to notify you of this incident, however, as part of BCAG's ongoing commitment to safeguarding the personal information of current and former employees we have taken this additional step and notified you.

**What Information Was Involved?** The information may have involved your name, driver's license number, and Social Security Number.

**What Are We Doing?** As soon as BCAG discovered the incident, we took the steps described above. We also implemented updated vendor selection policies and additional security measures to minimize the risk of a similar incident occurring in the future. We also notified law enforcement and will provide whatever cooperation may be necessary to hold the perpetrators accountable. In addition, we are offering you complimentary credit monitoring and identity protection services through IDX a leader in consumer identity protection. These services include <<12/24>> months of credit monitoring, identity protection monitoring, a \$1,000,000 identity theft insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is affected.

**What Can You Do?** We recommend that you review and implement the guidance included with this letter about how to protect your information. We also encourage you to enroll in the services offered to you through IDX by contacting 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> or scanning the QR code and using the enrollment code provided above. Please note the deadline to enroll is July 4, 2024.

**For More Information:** Further information about how to help protect your personal information appears on the following page. If you have questions or need assistance, please call 1-800-939-4170 Monday through Friday from 9:00 am - 9:00 pm Eastern Time or go to <https://app.idx.us/account-creation/protect>.

We take your trust in us and this matter very seriously. Please accept our sincere apologies for any worry or inconvenience that this may cause you.

Sincerely,

Bob Ciasulli Auto Group  
1458 Route 46E  
Little Falls, NJ 07424

## Steps You Can Take to Protect Your Personal Information

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

**Equifax**  
P.O. Box 105851  
Atlanta, GA 30348  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)

**Experian**  
P.O. Box 9532  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

**TransUnion**  
P.O. Box 2000  
Chester, PA 19016  
1-800-916-8800  
[www.transunion.com](http://www.transunion.com)

**Fraud Alert:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

**Security Freeze:** You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

**Federal Trade Commission**  
600 Pennsylvania Ave, NW  
Washington, DC 20580  
[consumer.ftc.gov](http://consumer.ftc.gov), and  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

**Maryland Attorney General**  
200 St. Paul Place  
Baltimore, MD 21202  
[marylandattorneygeneral.gov](http://marylandattorneygeneral.gov)  
1-888-743-0023

**New York Attorney General**  
Bureau of Internet and Technology  
Resources  
28 Liberty Street  
New York, NY 10005  
1-212-416-8433

**North Carolina Attorney General**  
9001 Mail Service Center  
Raleigh, NC 27699  
[ncdoj.gov](http://ncdoj.gov)  
1-877-566-7226

**You also have certain rights under the Fair Credit Reporting Act (FCRA):** These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit [https://files.consumerfinance.gov/f/documents/bcftp\\_consumer-rights-summary\\_2018-09.pdf](https://files.consumerfinance.gov/f/documents/bcftp_consumer-rights-summary_2018-09.pdf).

