



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Ryan C. Loughlin
Office: (267) 930-4786
Fax: (267) 930-4771
Email: rloughlin@mullen.law

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

May 22, 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 Association of California School Administrators (“ACSA”), located at 1029 J Street, Suite 500, Sacramento, CA 95814. We write to notify your office of an event that may involve personal information relating to Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, ACSA 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 September 24, 2023, ACSA became aware of suspicious activity in its computer environment that involved the encryption of certain files. ACSA promptly launched an investigation, with the assistance of third-party cybersecurity specialists, to determine the nature and scope of the event. The investigation determined that between September 23rd and 24th, 2023, an unauthorized actor gained access to certain ACSA systems and accessed or may have taken certain information contained therein.

ACSA conducted a comprehensive, programmatic and manual review to identify whether the files contained personal information and to whom such information relates. Once complete, ACSA also worked to validate the results and locate missing address information. ACSA completed this process on May 3, 2024, and then moved as quickly as possible to notify potentially affected individuals. The personal information related to Maryland residents that may have been impacted

include the following: name, address, date of birth, Social Security number, and employer assigned identification number.

Notice to Maryland Residents

On May 22, 2024, ACSA provided written notice of this event to potentially impacted individuals, including approximately twenty-eight (28) 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 becoming aware of the event, ACSA moved quickly to investigate and respond to the event, assess and further strengthen the security of its systems, and identify potentially affected individuals. Further, ACSA: notified federal law enforcement; is working to implement additional safeguards and training to its employees; and is providing access to credit monitoring services for twelve (12) months, through IDX, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, ACSA is providing potentially affected 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 banks, credit card companies, or other applicable institutions. ACSA is providing individuals with information on how to place a fraud alert and credit 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.

ACSA is providing written notice of this incident to relevant state regulators, as required, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Office of the Attorney General

May 22, 2024

Page 3

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4786.

Very truly yours,

Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL/aml
Enclosure

EXHIBIT A



association of california
school administrators

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

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

Enrollment Code: <<ENROLLMENT>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://response.idx.us/ACSA>

May 22, 2024

<<Variable Text 1>>

Dear <<Full Name>>:

Association of California School Administrators (“ACSA”) is writing to inform you of an event that may involve some of your personal information. Although we have received no indication of any actual or attempted identity theft or fraud as a result of this event, this notice provides information about the event, our response, and resources available to you to help protect your information from possible misuse, should you feel it is necessary to do so.

What Happened? On September 24, 2023, ACSA became aware of suspicious activity in its computer environment that involved the encryption of certain files. We promptly launched an investigation, with the assistance of third-party cybersecurity specialists, to determine the nature and scope of the event. The investigation determined that between September 23rd and 24th, 2023, an unauthorized actor gained access to certain ACSA systems and accessed or may have taken certain information contained therein. Therefore, we conducted a comprehensive, programmatic and manual review to identify whether the files contained personal information and to whom such information relates. Once complete, we also worked to validate the results and locate missing address information. We completed this process on May 3, 2024, and then moved as quickly as possible to notify potentially affected individuals.

What Information Was Involved? The investigation determined that your name, <<Variable Text 2>>, were potentially impacted.

What We Are Doing. The confidentiality, privacy, and security of information in our care are among our highest priorities. Upon becoming aware of the event, we moved quickly to investigate and respond to the event, assess and further strengthen the security of our systems and computer environment, and notify potentially affected individuals. While we have no evidence of misuse of any personal information related to this event, we are offering credit monitoring and identity protection services through IDX for <<12/24>> months, at no cost to you.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and credit reports for suspicious activity and to report any suspicious activity promptly to your bank, credit card company, or other applicable institution. Additional information and resources are included in the enclosed *Steps You Can Take To Protect Personal Information*. You may also enroll in the complimentary credit monitoring and identity protection services available to you. Enrollment instructions are attached to this letter.

For More Information. We understand that you may have questions about this event that are not addressed in this letter. If you have additional questions, please call the dedicated assistance line at 1-888-830-6084, Monday through Friday from 6 AM to 6 PM Pacific Time, excluding major U.S. holidays. Please have this letter ready if you call. Again, we take the privacy and security of information in our care very seriously and sincerely regret any inconvenience or concern this event may cause you.

Sincerely,

Edgar Zazueta
Executive Director
Association of California School Administrators

Steps You Can Take To Protect Personal Information

Enroll in Monitoring Services

We are offering identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection services include: <<12/24>> 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 the free identity protection services by calling 1-888-830-6084, going to <https://response.idx.us/ACSA>, or scanning the QR image and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 6:00 am – 6:00 pm Pacific Time. Please note the deadline to enroll is August 22, 2024.

1. **Website and Enrollment.** Scan the QR image or go to <https://response.idx.us/ACSA> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
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 1-888-830-6084 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant 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; 1-410-528-8662 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. There are approximately 4 Rhode Island residents that may be impacted by this event.