



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Jeffrey J. Boogay
Office: (267) 930-4784
Fax: (267) 930-4771
Email: jboogay@mullen.law

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

May 24, 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 First Bank of Alabama (“FBAL”) located at 120 North Street E. Talladega, AL 35160 and are writing to notify your office of an incident that may affect the security of certain personal information relating to eight (8) Maryland. By providing this notice, FBAL 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 October 5, 2023, FBAL became aware of suspicious activity in its email environment. In response, FBAL promptly took steps to secure the environment and launched an investigation to determine the nature and scope of the activity. FBAL’s investigation determined that there was unauthorized access and possible acquisition of the affected email accounts from October 3, 2023 to October 5, 2023. FBAL identified the affected files and engaged a data review vendor to conduct a comprehensive review of the files in order to identify the type of information contained therein, and to whom the information relates. On April 22, 2024, FBAL concluded its extensive review of the impacted data and began working to determine contact information and notify potentially impacted individuals. Since that time, FBAL has worked to verify the information and locate missing addresses in order to provide an accurate notice.

The information that could have been impacted includes name, and Social Security number or individual tax identification number.

Notice to Maryland Residents

On or about May 24, 2024, FBAL provided written notice of this incident to eight (8) 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, FBAL moved quickly to investigate and respond to the incident, assess the security of FBAL email tenant, and identify potentially affected individuals. FBAL is also working to implement additional safeguards. FBAL is providing access to credit monitoring services for twelve (12) months through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, FBAL is providing impacted individuals with guidance on how to better protect against identity theft and fraud. FBAL 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.

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

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4784.

Very truly yours,

Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB/hkl
Enclosure