



MULLEN
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June 17, 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 Leonard's Express ("Leonard's Express") located at 6070 Collett Road, Farmington, NY 14425, and are writing to notify your office of an incident that may affect the security of certain personal information relating to Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Leonard's Express 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 December 2, 2023, Leonard's Express discovered suspicious activity on its computer system that included the encryption of certain files. Leonard's Express quickly took steps to confirm the suspicious activity, and with the assistance of third-party forensic specialists, began an investigation to determine the nature and scope of the activity. Leonard's Express determined that an unauthorized actor gained access to systems on November 15, 2023, and accessed and acquired certain files between November 30, 2023 to December 2, 2023. As a result, Leonard's Express initiated a comprehensive programmatic and manual review of the data to assess the type of information involved and to whom it related, including identifying available address information. On May 10, 2024, Leonard's Express completed this review.

The information that could have been subject to unauthorized access includes name, health insurance information, Social Security number, date of birth, taxpayer number, account number, routing number, driver's license number, state identification number, and username/password.

Notice to Maryland Residents

On or about June 17, 2024, Leonard's Express provided written notice of this incident to fifty-three (53) 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, Leonard's Express moved quickly to investigate and respond to the incident, assess the security of Leonard's Express systems, and identify potentially affected individuals. Further, Leonard's Express notified federal law enforcement regarding the event. Leonard's Express is also working to implement additional safeguards and training to its employees. Leonard's Express is providing access to credit monitoring services for twelve (12) months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Leonard's Express is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Leonard's Express 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.

Leonard's Express is providing written notice of this incident to relevant state 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) 930-4786.

Very truly yours,

Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL/mah
Enclosure

EXHIBIT A



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:

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

June 17, 2024

NOTICE OF <<Variable Text 1>>

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

Leonard's Express is writing to notify you of an event that may involve some of your personal information. We write to provide you with information about the event, our response, and steps you can take to help protect against the possible misuse of your information, should you feel it is appropriate to do so.

What Happened? On December 2, 2023, Leonard's Express discovered suspicious activity on its computer system, including the encryption of certain files. Leonard's Express quickly took steps to confirm the suspicious activity, and with the assistance of third-party forensic specialists, began an investigation to determine the nature and scope of the activity. Leonard's Express determined that an unauthorized actor gained access to systems on November 15, 2023, and accessed and acquired certain files between November 30, 2023 to December 2, 2023. As a result, Leonard's Express initiated a comprehensive programmatic and manual review of the data to assess the type of information potentially involved and to whom it related, including identifying available address information. On May 10, 2024, Leonard's Express completed this review. Leonard's Express is notifying you because its investigation determined information related to you was contained within the data.

What Information Was Involved? Your name and <<Variable Text 2>> were present in the involved files. We have no evidence that any of your information was used for identity theft or fraud.

What We Are Doing. We take this incident and the obligation to safeguard the information in our care very seriously. After discovering the suspicious activity, we promptly took steps to contain the issue and engaged with a third-party forensic specialist to assist in conducting a comprehensive investigation. Further, as part of our ongoing commitment to the privacy and security of personal information in our care, we are reviewing and enhancing existing policies and procedures relating to data protection and security. We have instituted additional security measures to better protect against future similar events.

Leonard's Express has no evidence of fraud or identity theft as a result of this event, however, out of an abundance of caution, we are notifying you and providing information and resources to assist you in helping to protect your personal information, should you feel it appropriate to do so. As an added precaution, we are offering you access to credit monitoring and identity theft protection services for <<12/24>> months through IDX at no cost to you. If you wish to activate these complimentary services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Personal Information*. We encourage you to enroll in these services as we are unable to act on your behalf to do so.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing account statements and monitoring your free credit reports for suspicious activity and to detect errors. You should report any fraudulent activity to law enforcement. You can also enroll to receive the complimentary credit monitoring services that we are offering to you. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*.

For More Information. If you have additional questions or concerns, please feel free to call us at 1-888-973-9897. We are available 9 am – 9 pm Eastern Time. You may also write Leonard's Express at 6070 Collett Road, Farmington, NY 14425.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

Leonard's Express, Canandaigua Driving School, Integrated Logistics, Johnson Equipment Sales & Service, Inc.

Steps You Can Take To Help Protect Personal Information

Enroll in Monitoring Services

1. 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. Please note the deadline to enroll is September 17, 2024.

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 1-888-973-9897 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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) 442-9828; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 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 1 Rhode Island residents that may be impacted by this event.