MULLEN COUGHLIN LLC
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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

August 5, 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 Wright Brothers Construction Company, Inc. ("WBCCI") located at 1500 Lauderdale Memorial Highway Northwest, Charleston, TN 37310, and write to notify your office of an incident that may affect the security of certain personal information relating to one (1) Maryland resident. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, WBCCI 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 April 5, 2024, WBCCI identified technical issues affecting certain systems within its computer environment. In response, WBCCI promptly took steps to respond and secure the environment and launched a thorough investigation to determine the full nature and scope of the event. The investigation confirmed that an uunauthorized individual took certain files from WBCCI's environment between April 3, 2024 and April 5, 2024. WBCCI then diligently reviewed the data in the accessed files to confirm the information present and to whom it related. After this time-consuming process was completed, WBCCI worked to provide notification to individuals whose information was identified in the involved files and potentially impacted as quickly as possible.

The information that could have been subject to unauthorized access includes name and Social Security number.

Notice to Maryland Resident

On or about August 5, 2024, WBCCI provided written notice of this incident to one (1) Maryland resident. 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, WBCCI moved quickly to investigate and respond to the incident, assess the security of WBCCI systems, and identify potentially affected individuals. Further, WBCCI notified federal law enforcement regarding the event. WBCCI is also working to implement additional safeguards and training to its employees. WBCCI is providing access to credit monitoring services for twelve (12) months , through Transunion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, WBCCI is providing impacted 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 credit card company and/or bank. WBCCI 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.

WBCCI 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) 930-4888.

Very truly yours,

Richard Aponte-Boyd of
MULLEN COUGHLIN LLC

RAB/sep
Enclosure

EXHIBIT A

Wright Brothers Construction Company, Inc
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998

[redacted]

August 5, 2024

NOTICE OF DATA BREACH

Dear [redacted]:

Wright Brothers Construction Company, Inc. ("WBCCI") writes to notify you of a recent event that may affect certain information related to you. We write to provide you with information about the event, our response, and the resources available to assist you with safeguarding your information, should you feel it appropriate to do so. Please know that safeguarding the information in our care is important to us, and we have been working diligently to investigate and respond to this event.

What Happened? In April 2024, WBCCI identified technical issues affecting certain systems within our computer environment. In response, we promptly took steps to respond and secure the environment and launched a thorough investigation to determine the full nature and scope of the event. The investigation confirmed that an unauthorized individual took certain files from our environment between April 3, 2024 and April 5, 2024. We then diligently reviewed the data in the accessed files to confirm the information present and to whom it related. After this time-consuming process was completed, we worked to provide notification as quickly as possible thereafter. You are receiving this letter because your information was identified in the involved files.

What Information Was Involved? Our investigation identified that your name and Social Security number was present in the involved files.

What We Are Doing. WBCCI takes this event and the obligation to safeguard the information in our care seriously. After identifying the suspicious activity, we took steps to confirm our system security, and conducted a comprehensive investigation of the event to confirm its nature, scope, and impact. We also promptly notified federal law enforcement, and are cooperating with its investigation. Further, as part of our ongoing commitment to the privacy and security of information in our care, we instituted additional security measures to better protect against future similar events. We are also reviewing and, where necessary, enhancing our existing procedures relating to data protection and security, and providing additional training to employees regarding data security.

As an added precaution we are offering you access to twelve (12) months of credit monitoring and identity theft protection services through Cyberscout, a TransUnion company, at no cost to you. If you wish to activate these services, please 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 your account statements and monitoring your free credit reports for suspicious activity and to detect errors. We also encourage you to monitor your free credit reports for suspicious activity and to detect errors and promptly report incidents of suspected identity theft to your credit card company and/or bank. We also encourage you to review the enclosed *Steps You Can Take to Protect Personal Information* and activate the complimentary identity monitoring services we are offering to you.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-833-531-3433 between the hours of 8 am - 8 pm ET, Monday through Friday (excluding major U.S. holidays).

Sincerely,

Wright Brothers Construction Company, Inc.
www.wbcci.com

STEPS YOU CAN TAKE TO HELP PROTECT YOUR MINOR DEPENDENT'S PERSONAL INFORMATION

Enroll in Monitoring Services

In response to the incident, we are providing you with access to Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services at no charge. These services provide you with alerts for twelve (12) months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout, a TransUnion company, specializing in fraud assistance and remediation services.

To enroll in Credit Monitoring services at no charge, please log on to **https://www.mytrueidentity.com** and follow the instructions provided. When prompted please provide the following unique code to receive services: [redacted]

In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

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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/. Wright Brothers Construction Company, Inc. is located at 1500 Lauderdale Memorial Highway Northwest, Charleston TN 37310.

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 [#] Rhode Island residents that may be impacted by this event.

AVISO DE DATA BREACH

[redacted]:

Wright Brothers Construction Company, Inc. ("WBCCI") le escribe para notificarle sobre un evento reciente que puede afectar cierta información relacionada con usted. Le escribimos para darle información sobre el evento, nuestra respuesta y los recursos disponibles para ayudarle a proteger su información, en caso de que considere apropiado hacerlo. Tenga en cuenta que proteger la información bajo nuestro cuidado es importante para nosotros, y hemos estado trabajando diligentemente para investigar y responder a este evento.

¿Qué sucedió? En abril de 2024, WBCCI identificó problemas técnicos que afectaban ciertos sistemas dentro de nuestro entorno informático. En respuesta, tomamos medidas de inmediato para responder y proteger el entorno y lanzamos una investigación exhaustiva para determinar la naturaleza y el alcance completo del evento. La investigación confirmó que una persona no autorizada tomó ciertos archivos de nuestro entorno entre el 3 de abril de 2024 y el 5 de abril de 2024. Luego revisamos diligentemente los datos en los archivos a los que se accedió para confirmar la información presente y con quién se relaciona. Después de completar este proceso que lleva mucho tiempo, trabajamos para notificar el suceso lo más rápido posible a partir de entonces. Usted recibió esta carta porque su información fue identificada en los archivos involucrados.

¿De qué información se trató? Nuestra investigación identificó que su nombre y Social Security number estaban presentes en los archivos involucrados.

¿Qué estamos haciendo? WBCCI toma este evento y la obligación de proteger la información bajo nuestro cuidado con seriedad. Después de identificar la actividad sospechosa, tomamos medidas para confirmar la seguridad de nuestro sistema y realizamos una investigación integral del evento para confirmar su naturaleza, alcance e impacto. También notificamos de inmediato a las autoridades federales y estamos cooperando con su investigación. Además, como parte de nuestro compromiso continuo con la privacidad y seguridad de la información bajo nuestro cuidado, instituimos medidas de seguridad adicionales para protegernos mejor contra futuros eventos similares. También estamos revisando y, cuando sea necesario, mejorando, nuestros procedimientos existentes relacionados con la protección y seguridad de los datos, y proporcionando capacitación adicional a los empleados con respecto a la seguridad de los datos.

Como precaución adicional, le ofrecemos acceso a meses de servicios de monitoreo de crédito y protección contra robo de identidad a través de Cyberscout, una empresa de TransUnion sin costo alguno para usted. Si desea activar estos servicios, siga las instrucciones incluidas en los *Pasos que puede tomar para ayudar a proteger la información personal* adjuntos. Le recomendamos que se inscriba en estos servicios ya que no podemos actuar en su nombre para hacerlo.

Qué puede hacer usted. Recomendamos que se mantenga alerta ante los incidentes de robo de identidad y fraude al revisar sus estados de cuenta y que controle sus informes de crédito gratuitos para detectar errores. También le recomendamos que controle sus informes de crédito gratuitos para detectar actividades sospechosas y detectar errores e informe de inmediato incidentes de sospecha de robo de identidad a su compañía de tarjeta de crédito o banco. También le recomendamos revisar las *Medidas que puede tomar para proteger su información personal* adjuntas y activar los servicios de monitoreo de identidad gratis que le estamos ofreciendo.

Cómo obtener más información. Entendemos que puede tener preguntas sobre este incidente que no se tratan en esta carta. Si tiene más preguntas, llame a nuestra línea de asistencia exclusiva al 1-833-531-3433 entre las 8 a.m. y 8 p.m., hora estándar del este, de lunes a viernes, (excepto los principales feriados de los EE. UU.).

Cordialmente,

Wright Brothers Construction Company, Inc.
www.wbcci.com

MEDIDAS QUE PUEDE TOMAR PARA AYUDAR A PROTEGER SU INFORMACIÓN PERSONAL

Supervise sus cuentas

Según las leyes de los Estados Unidos de Norteamérica, el consumidor tiene derecho a un informe crediticio gratuito anual de cada una de las tres principales agencias de informes crediticios, Equifax, Experian y TransUnion. Para solicitar un informe de crédito gratuito, visite www.annualcreditreport.com o llame al número gratuito 1-877-322-8228. Los consumidores pueden comunicarse directamente con las tres principales agencias de informes crediticios indicadas a continuación para solicitar una copia gratuita de su informe de crédito.

Los consumidores tienen derecho a colocar una "alerta de fraude" inicial o prolongada en un expediente crediticio de manera gratuita. Una alerta de fraude inicial es una alerta de un año que se coloca en el expediente crediticio de un consumidor. Al ver una alerta de fraude en el expediente crediticio de un consumidor, una compañía debe tomar medidas para verificar la identidad del consumidor antes de otorgarle un crédito nuevo. Si los consumidores resultan víctimas de un robo de identidad, tienen derecho a una alerta de fraude prolongada, que es una alerta de fraude de una duración de siete años. Si los consumidores desearan colocar una alerta de fraude, deben comunicarse con cualquiera de las tres agencias principales de informes de crédito que se indican a continuación.

Como alternativa a una alerta de fraude, los consumidores tienen derecho a realizar un "congelamiento de crédito" sobre un informe de crédito, lo cual impedirá que una agencia de crédito divulgase información del informe crediticio sin la autorización expresa del consumidor. El congelamiento de crédito está diseñado para evitar que se aprobasen créditos, préstamos y servicios en nombre del consumidor sin su consentimiento. Sin embargo, los consumidores deben tener en cuenta que el uso de un congelamiento de crédito para tener control de quién tiene acceso a la información personal y financiera de su informe de crédito puede retrasar, impedir o interferir en la aprobación oportuna de alguna solicitud o aplicación posterior que hicieran en relación con un nuevo préstamo, crédito, hipoteca o cualquier otra cuenta que implicase la ampliación del crédito. De conformidad con las leyes federales, a los consumidores no se les puede cobrar por colocar o levantar un congelamiento de crédito sobre su informe de crédito. Para solicitar un congelamiento del crédito, es posible que las personas deban proporcionar toda o parte de la siguiente información:

1. nombre completo (incluida la inicial del segundo nombre, así como Jr., Sr., II, III, etc.);
2. número de Seguro Social;
3. fecha de nacimiento;
4. direcciones de los últimos dos a cinco años;
5. prueba del domicilio actual, como una factura de servicios públicos o de teléfono;
6. una fotocopia legible de una tarjeta de identificación emitida por el gobierno (licencia de conducir o tarjeta de identificación del estado, etc.) y
7. una copia de la denuncia policial, del informe de la investigación o de la denuncia a una agencia del orden público sobre el robo de identidad, en caso de ser víctima de este delito.

Si los consumidores desearan realizar un congelamiento de crédito o colocar una alerta de fraude, deben comunicarse con las tres principales agencias de informes crediticios que se indican a continuación:

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

Información adicional

Los consumidores pueden informarse mejor sobre el robo de identidad, las alertas de fraude, los congelamientos de crédito y las medidas que pueden tomar para proteger su información personal al comunicarse con las agencias de informes del consumidor, la Comisión Federal de Comercio (Federal Trade Commission) o el Fiscal general de su estado. La información de contacto de la Comisión Federal de Comercio es la siguiente: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338) y teléfono de texto (text telephone, TTY): 1-866-653-4261. La Comisión Federal de Comercio también recomienda a quienes descubriesen que su información se ha utilizado de manera indebida que presentasen una queja a su oficina. Los consumidores pueden obtener más información sobre cómo presentar dicha queja por medio de la información de contacto mencionada con anterioridad. Si alguna vez los consumidores sufriesen un robo de identidad o un fraude, tienen derecho a presentar una denuncia policial. Tenga en cuenta que, para presentar una denuncia a las autoridades policiales por robo de identidad, los consumidores probablemente tendrán que proporcionar alguna prueba de que han sido víctimas de dicho delito. Los casos de robo de identidad conocidos o sospechados también deben denunciarse a la policía y al Fiscal general del estado correspondiente. Este aviso no ha sido retrasado por las fuerzas policiales.

En el caso de los residentes del Distrito de Columbia, se podrá contactar al Fiscal General del Distrito de Columbia en: 400 6th Street, NW, Washington, D.C. 20001; (202) 442-9828; y oag@dc.gov.

En el caso de los residentes de Maryland, se podrá contactar al Fiscal general del estado de Maryland en: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 o 1-888-743-0023 y https://www.marylandattorneygeneral.gov/.

En el caso de los residentes de Nuevo México, los consumidores tienen derechos conforme a la Ley de Informe Crediticio Justo (Fair Credit Reporting Act, FCRA), como, por ejemplo, el derecho a que les digan si se utilizó la información en su archivo de crédito en contra de ellos, el derecho a saber lo que está en su archivo de crédito, el derecho a solicitar su calificación de crédito y el derecho a objetar la información incompleta o imprecisa. Asimismo, de conformidad con la Ley de Informe Crediticio Justo, las agencias de informes del consumidor deben corregir o suprimir toda información que sea imprecisa, esté incompleta o no se pueda verificar; las agencias de informes del consumidor no pueden reportar información negativa desactualizada; el acceso al archivo de los consumidores es limitado; los consumidores deben dar su consentimiento para que se entreguen los informes crediticios a los empleadores; los consumidores pueden limitar las ofertas "prefiltradas" de créditos y seguros que reciben en base a la información de su informe crediticio y los consumidores pueden solicitar compensación por daños y perjuicios de los infractores. Los consumidores podrían tener derechos adicionales en virtud de la Ley de Informe Crediticio Justo que no están resumidos en este documento. Las víctimas de robo de identidad y el personal de servicio militar activo tienen derechos adicionales específicos conforme a la Ley de Informe Crediticio Justo. Para revisar sus derechos conforme a la Ley de Informe Crediticio Justo, les recomendamos a los consumidores que visiten www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf o escriban a Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

En el caso de los residentes de Nueva York, se podrá contactar al Fiscal general del estado de Nueva York en: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755 o https://ag.ny.gov.

En el caso de los residentes de Carolina del Norte, se podrá contactar al Fiscal general del estado de Carolina del Norte en: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 o 1-919-716-6000 y www.ncdoj.gov.

En el caso de los residentes de Rhode Island, se podrá contactar al Fiscal General del estado de Rhode Island en: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov y 1-401-274-4400. En virtud de las leyes de Rhode Island, las personas tienen el derecho a obtener cualquier informe policial archivado respecto a este suceso. Hay aproximadamente [#] residentes de Rhode Island que pueden verse afectados por este evento.

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