



MULLEN
COUGHLIN^{LLC}
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426 W. Lancaster Avenue, Suite 200
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September 12, 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 H2OBX LLC (“H2O”) located at 8526 Caratoke Hwy., Powells Point, NC 27966, and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) Maryland residents. By providing this notice, H2O 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 or about August 20, 2024, H2O discovered suspicious activity impacting certain systems. H2O quickly launched an investigation to determine the nature and scope of the activity. The investigation determined that an unknown actor accessed certain systems in H2O’s network and copied certain files on August 20, 2024. As a result, H2O conducted a detailed review of the affected files to determine the types of information present and to whom the information related. On August 31, 2024, H2O identified personal information relating to certain individuals was present within the affected files.

The information that could have been impacted includes name, Social Security number, driver’s license number or state issued ID number, passport number, medical information, and/or employee tax Identification number.

Notice to Maryland Residents

On or about September 12, 2024, H2O provided written notice of this incident to two (2) 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, H2O moved quickly to investigate and respond to the incident, assess the security of H2O systems, and identify potentially affected individuals. Further, H2O notified federal law enforcement regarding the event. H2O is also working to implement additional safeguards and training to its employees. H2O is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, H2O is providing impacted individuals with guidance on how to better protect against identity theft and fraud. H2O 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. H2O notified federal law enforcement regarding the event and is providing written notice of this incident to relevant state regulators, as necessary.

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/aml
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

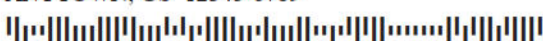
4 2 850 *****AUTO** ALL FOR AADC 233

SAMPLE A. SAMPLE - L01

APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



September 12, 2024

NOTICE OF [EXTRA1]

Dear Sample A. Sample:

H2OBX LLC (“H2O”) writes to inform you of an event that may affect the security of your personal information. This letter provides details of the event, our response, and resources available to you to help protect your personal information, should you feel it is appropriate to do so.

What Happened. On August 21, 2024, H2O became aware of unusual activity in its network. We immediately took steps to disconnect our network, isolate potentially impacted workstations, and commenced recovery efforts. We promptly launched an investigation into the full nature and scope of the activity. Our investigation determined that on August 20, 2024, an unauthorized party accessed certain servers and copied certain files stored in our system. In response we conducted a detailed review of the files to identify the type of information stored therein and to whom that information related. On or about, August 31, 2024, we determined that information related to you was impacted by this event and worked to locate current mailing addresses, in order to provide an accurate notification.

What Information Was Involved? The information identified in the involved files includes your name [Extra2].

What We Are Doing. We take this incident and the security of personal information in our care seriously. Upon discovering the unusual activity, we took steps to further increase the security of our systems and investigated the activity. As part of our ongoing commitment to the privacy of information in our care, we implemented additional technical security measures designed to prevent similar future incidents. We are also reviewing and enhancing existing policies and procedures. As an added precaution, H2O is offering you complimentary access to [Extra3_12or24] months of credit monitoring through Experian. These services provide you with alerts for [Extra3_12or24] months from the date of enrollment when changes occur to your credit file. Details of this offer and instructions on how to enroll in the services may be found in the attached *Steps You Can Take to Protect Personal Information*. Please note that, due to privacy restrictions, we are unable to automatically enroll you in the offered identity monitoring services.

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. Additional information may be found in the attached *Steps You Can Take to Protect Personal Information*.

For More Information. If you have questions about this matter, you may contact our dedicated assistance line at 1-833-918-1153, Monday through Friday from 6 am to 6 pm Pacific (excluding major U.S. holidays). You may also write to us at 8526 Caratoke Highway, Powells Point, NC 27966.

Sincerely,

Damian Dondero
General Manager

Steps You Can Take To Protect Personal Information

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3_12or24] months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for [Extra3_12or24] months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra3_12or24]-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** December 31, 2024 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-833-918-1153 by December 31, 2024. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [Extra3_12or24]-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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 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 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.