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COUGHLIN^{LLC}
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October 4, 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 Macias Gini & O'Connell LLP ("MGO") located at 2121 Avenue of the Stars suite 2200, Los Angeles, CA 90067, 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, MGO 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 December 16, 2023, MGO identified suspicious activity related to its computer systems. MGO promptly took steps to secure their network and began an investigation determine the nature and scope of the activity. The investigation determined that the network had been accessed by an unknown actor between December 16, 2023 and December 22, 2023, and during this time files were accessed and/or copied. As a result, MGO initiated a thorough review of the contents of the impacted files to identify what information was present and to whom such information related. Upon completion of this review, MGO worked diligently to reconcile this information with their internal records to confirm the individuals whose information may have been affected and the appropriate contact information for those individuals. MGO completed this review on or about September 6, 2024, and thereafter began notifying potentially impacted individuals as quickly as possible.

The information that could have been impacted includes name, driver's license number, passport number, Social Security number, and/or financial account number.

Notice to Maryland Resident

On or about October 4, 2024, MGO 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, MGO moved quickly to investigate and respond to the incident, assess the security of MGO systems, and identify potentially affected individuals. Further, MGO notified federal law enforcement regarding the event. MGO is also working to implement additional safeguards and training to its employees. MGO is providing access to credit monitoring services for twelve (12) months, through Experian to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

MGO 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) 930-4888.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Richard Aponte-Boyd".

Richard Aponte-Boyd of
MULLEN COUGHLIN LLC

RAB/ajl
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

October 4, 2024



M1589-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 INDIVIDUAL MGO

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



NOTICE OF [Extra1 - SECURITY INCIDENT / DATA BREACH]

Dear Sample A. Sample:

Macias Gini & O'Connell LLP ("MGO") is writing to notify you of a matter that may affect certain information related to you. This letter provides you with information about the event, our response, and steps you may take to help protect your information, should you feel it appropriate to do so.

What Happened? We became aware of suspicious activity involving our computer network and promptly began an investigation. The investigation determined that the network had been accessed by an unknown actor between December 16, 2023 and December 22, 2023, and during this time files were accessed and/or copied. As a result, MGO initiated a thorough review of the contents of the impacted files to identify what information was present and to whom such information related. Upon completion of this review, we worked diligently to reconcile this information with our internal records to confirm the individuals whose information may have been affected and the appropriate contact information for those individuals. We completed this review on September 6, 2024, and thereafter began notifying potentially impacted individuals as quickly as possible. You are receiving this notification because we determined that certain information related to you was present and therefore accessible in connection with this matter.

What Information Was Involved? Our investigation identified the following information related to you may have been included within the impacted files: your name, driver's license number, passport number, Social Security number and/or financial account information. At this time, we do not have any indication that anyone has used your information to commit identity theft or fraud as a result of this event and provide this notice out of an abundance of caution.

What We Are Doing. We take this matter and the security of personal information in our care seriously. We moved quickly to respond and investigate the suspicious activity, assess and secure our network, and notify potentially impacted individuals. As part of our ongoing commitment to information security, we are currently reviewing our policies and procedures, as well as assessing new cybersecurity tools, to reduce the risk of a similar incident from occurring in the future. We also notified federal law enforcement and will be notifying relevant regulators, as required.

As an added precaution, we are also offering ## months of complimentary access to credit monitoring services through Experian. Individuals who wish to receive these services must enroll by following the below enrollment instructions, as we are unable to enroll you.



What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements, explanation of benefits statements, and monitoring free credit reports for suspicious activity and to detect errors. Suspicious activity should be promptly reported to relevant parties including an insurance company, healthcare provider, and/or financial institution. Additional information and resources may be found below in the *Steps You Can Take to Help Protect Personal Information* section of this notice.

For More Information. If you have any questions, please contact us at 833-918-4644, Monday through Friday from 6:00 am to 6:00 pm Pacific (excluding major US holidays). You may also write to 2121 Avenue of the Stars suite 2200, Los Angeles, CA 90067. We take this matter very seriously and sincerely regret any inconvenience or concern it may cause you.

Sincerely,

Stephanie Sessions Perkins
General Counsel and Chief Risk Officer

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for ## 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 ## 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 ##-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 833-931-7577 by December 31, 2024. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR ##-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; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

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.