



MULLEN
COUGHLIN^{LLC}
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426 W. Lancaster Avenue, Suite 200
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October 7, 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 Kevin Grunawalt d/b/a Verso Financial (“Verso Financial”) located at 3930 Edison Lakes Parkway, Suite 220, Mishawaka, IN 46545, and are writing to notify your office of an event 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, Verso Financial 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 February 15, 2024, Verso Financial became aware of suspicious activity involving a Verso Financial email account. In response, Verso Financial took steps to secure the account and began a comprehensive investigation into the nature and scope of the activity. From that investigation, it was determined that the email account had been subject to unauthorized access by an unknown actor at times between October 2023 and February 2024, during which the unknown actor had the capability to copy contents of the mailbox. Verso Financial subsequently began an extensive review of the email account to identify and catalogue what information was present within the account and to whom that information related. Following the completion of that review, Verso Financial then moved promptly to locate and confirm addresses for affected individuals in order to provide necessary notifications. Based on these efforts, it has been determined that the information related to Maryland residents, that may have been subject to unauthorized access, includes name, Social Security number and financial account information.

Notice to Maryland Resident

On October 7, 2024, Verso Financial 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

Verso Financial took prompt steps to respond to this incident, secure its email environment and conduct a detailed investigation to confirm the nature and scope of the data that may be affected. Verso Financial is notifying these individuals and providing them with guidance on how to better protect against identity theft and fraud, including 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. Verso Financial is also providing these individuals with access to credit monitoring services for twelve (12) months, through Epiq Global and Equifax, no cost to these individuals. Verso Financial is further 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) 930-4773.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Alex Belton', followed by a horizontal line extending to the right.

M. Alexandra Belton of
MULLEN COUGHLIN LLC

MABB/jlm
Enclosure

EXHIBIT A



Secure Processing Center
25 Route 111, P.O. Box 1048
Smithtown, NY 11787

Postal Endorsement Line

<<Full Name>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<City>>, <<State>> <<Zip>>

<<Country>>

***Postal IMB Barcode

<<Date>>

RE: NOTICE OF DATA <<Variable Data 1>>

Dear <<Full Name>>:

Kevin Grunawalt/Verso Financial is writing to make you aware of a data privacy event that may affect some of your personal information. This notice provides you with details about the event, our response, and resources available to you to help protect your information, should you feel it is appropriate to do so.

What Happened? We were made aware of suspicious activity involving an employee email account and, in response, we initiated an investigation into the nature and scope of the activity. From that investigation, it was determined that the email account had been subject to unauthorized access by an unknown actor at times between October 2023 and February 2024, during which the unknown actor had the capability to copy contents of the mailbox. We subsequently began an extensive review of the email account to identify and catalogue what information was present within the account and to whom that information related. Following the completion of that review, on or around August 23, 2024, we moved promptly to locate and confirm addresses for affected individuals in order to provide necessary notifications.

What Information Was Involved? Your name and the following types of information relating to you were identified as having been present within the email account at the time of the event: <<Breached Elements>>.

What We Are Doing. We take our responsibility to safeguard the data entrusted to us very seriously. We responded promptly to this event and worked diligently to conduct a comprehensive investigation and thoroughly review the information potentially affected. We are also taking steps to enhance our existing security measures to further protect the data in our care moving forward. As an added precaution, we are providing you with access to twelve (12) months of complimentary Equifax credit monitoring services provided through Epiq Global. Information on how to enroll in these services is provided in the attached ***Steps You Can Take To Protect Personal Information***. This section also includes guidance on resources available to you to protect personal information against potential misuse.

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 for at least the next 12 to 24 months. We also encourage you to review the attached ***Steps You Can Take To Protect Personal Information*** and enroll in the credit monitoring services we are offering. Please note, we are not permitted to enroll you in these services and so you will need to follow the instructions included below to enroll.

For More Information. We sincerely apologize for any inconvenience that this may cause. If you have questions, please call our dedicated assistance line at 844-218-4458, Monday through Friday, between 9:00 a.m. and 9:00 p.m., Eastern.

Sincerely,

Verso Financial

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services



<<Full Name>>

Enter your Activation Code: <<Activation Code>>

Enrollment Deadline: <<Enrollment Deadline>>

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate

Enter your unique Activation Code of <<Activation Code>> then click “Submit” and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click “Continue”.

If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.

Once you have successfully signed in, you will skip to the Checkout Page in Step 4

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click ‘Sign Me Up’ to finish enrolling.

You’re done!

The confirmation page shows your completed enrollment.

Click “View My Product” to access the product features.

¹WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded. ²The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. ³Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com ⁴The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. 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 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 <<RI>> Rhode Island residents that may be impacted by this event.