



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Alexander T. Walker
Office: (267) 930-4801
Fax: (267) 930-4771
Email: awalker@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 23, 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 EP Caine & Associates CPA, LLC (“EP Caine”) located at 175 Strafford Avenue, Suite 200, Wayne, PA 19087, and are writing to notify your office of an incident that may affect the security of certain personal information relating to 6 Maryland residents. By providing this notice, EP Caine 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 August 29, 2024, EP Caine became aware of suspicious activity relating to its third-party application, SmartVault, used for secure file storing and sharing. Please note, this incident did not involve any compromise of EP Caine’s internal computer network or email environment. Immediate action was taken to investigate the nature and scope of the activity with assistance from industry-leading cybersecurity specialists. The investigation determined that files containing client information had been copied from SmartVault, by an unknown actor on July 9, 2024.

EP Caine completed a comprehensive review of the files that could have been viewed or copied to determine whether any sensitive information was contained within those files. The review to identify potentially impacted individuals, the types of information involved, and an address, where possible, was recently completed. The potentially impacted types of information may vary by individual and includes name, social security number and/or individual taxpayer identification number.

Notice to Maryland Residents

On or about October 23, 2024, EP Caine began providing written notice of this incident to approximately 6 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

EP Caine is providing access to credit monitoring services for 12 months, through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, EP Caine 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. EP Caine 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.

EP Caine 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. EP Caine has also notified the IRS and FTC of this incident.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4801.

Very truly yours,

Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW/mah
Enclosure

EXHIBIT A

EP Caine & Associates CPA, LLC
Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

October 23, 2024



M2551-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 ADULT

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



Re: NOTICE OF [SECURITY INCIDENT] / [DATA BREACH]

Dear Sample A. Sample:

EP Caine & Associates CPA, LLC (“EP Caine”) is writing to provide you with notice of a data security event that impacted some of your information. We are providing you with information about the event, our response to it, and steps you can take to protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so.

What Happened? On August 29, 2024, EP Caine became aware of suspicious activity relating to its third-party application, SmartVault, used for secure file storing and sharing. Please note, this event did not involve any compromise of EP Caine’s internal computer network or email environment. Immediate action was taken to investigate the nature and scope of the activity with assistance from industry-leading cybersecurity specialists. The investigation determined that files containing client information had been copied from SmartVault, by an unknown actor on July 9, 2024. EP Caine completed a comprehensive review of the files that could have been viewed or copied to determine whether any sensitive information was contained within those files. EP Caine is notifying individuals whose information was stored within the impacted files.

What Information Was Involved? Our investigation determined that the following types of your information may have been impacted by this incident: W2 form, Social Security number, and name.

What We Are Doing. EP Caine takes this event and the privacy of information in our care seriously. In response, we have conducted a diligent investigation to confirm the full nature and scope of the event and have taken prompt steps to further protect against similar incidents occurring in the future. In addition, we have notified the IRS and FTC of this incident. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our policies, procedures, and processes related to the storage and access of sensitive information to reduce the likelihood of a similar future incident.

As an added precaution, we are offering you access to ## months of credit monitoring and identity protection services through Experian. If you wish to activate the credit monitoring services or learn more about this offer, please see the enclosed *Steps You Can Take to Protect Personal Information*.

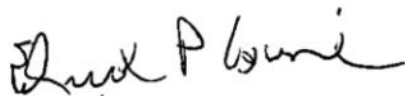
What You Can Do. Please review the enclosed *Steps You Can Take to Protect Personal Information*, which contain information on what you can do to protect against the possibility of identity theft and fraud. You can also enroll to receive the complimentary credit monitoring and identity protection services being offered. We also encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity.

0000001



For More Information. If you have questions about this incident that are not addressed in this notice, please call our toll-free dedicated assistance line at 833-918-1289, from 9:00am – 9:00pm EST, Monday through Friday, excluding holidays. You may also write to EP Caine at 175 Strafford Avenue, Suite 200, Wayne, PA 19087.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward P. Caine". The signature is fluid and cursive, with the first name "Edward" being more prominent.

Edward P. Caine
EP Caine & Associates CPA, LLC

Steps You Can Take to Protect Personal Information

Enroll in Credit Monitoring

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 January 31, 2025** (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 833-918-1289 by January 31, 2025. Be prepared to provide engagement number [B#####] 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 your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your 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 one-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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one 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 your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a credit freeze, you will need to provide 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 you are a victim of identity theft.

Should you wish to place a fraud alert or a credit freeze, 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

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or

fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your 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; 202-727-3400; 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 2 Rhode Island residents that may be impacted by this event.

