



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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November 6, 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 CST Engineering, Inc. ("CST") located at 7075 Samuel Morse Dr. #250, Columbia, Maryland 21046, and are writing to notify your office of an event that may affect the security of certain information relating to approximately two hundred twelve (212) Maryland residents. This notice may be supplemented if new significant facts are learned subsequent to CST's submission. By providing this notice, CST 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 March 12, 2024, CST became aware of suspicious activity affecting certain systems within their network. In response, CST took prompt steps to secure their network and engaged forensic specialists to investigate the event. The investigation determined that there was unauthorized access to certain data within CST's network and on March 12, 2024, certain files were viewed and/or copied from CST's systems. In response, CST undertook a comprehensive review of the potentially impacted files to determine what information was present and to whom it pertained. The scope of Maryland residents was confirmed on November 4, 2024, following receipt of the notification vendor's correlation of the address information provided by CST with the U.S. Postal Service's National Change of Address Database.

The information that could have been subject to unauthorized access includes name, Social Security number, driver's license or state identification card number, US alien registration number, Passport

number, financial account information, payment card information, medical information, health insurance information, and username and password.

Notice to Maryland Residents

On or about May 11, 2024, CST provided preliminary notice of the event and provided credit monitoring to CST's employees. CST then provided formal written notice of this event on November 6, 2024, to approximately two hundred twelve (212) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***. Additionally, CST is providing substitute notice of this event via its website and the Maryland media.

Other Steps Taken and To Be Taken

Upon becoming aware of the event, CST moved quickly to investigate, respond, assess the security of CST systems, and identify potentially affected individuals. Further, CST notified federal law enforcement regarding the event. CST is providing access to credit monitoring services for twenty-four (24) months through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals. CST also established a toll-free assistance line to address any questions from notified individuals.

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

CST is providing written notice of this event to relevant state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data event, please contact us at (267) 930-4651.

Very truly yours,

Jillian Seifrit of
MULLEN COUGHLIN LLC

JZS/ajl
Enclosure

EXHIBIT A



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

November 6, 2024

M3512-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 ADULT
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



[Extra 1 - Notice of Data Breach]

Dear Sample A. Sample:

CST Engineering, Inc. (“CST”) is writing to inform you of an event that may involve your information. The privacy and security of information are of utmost important to us, and we take this event seriously. We are providing you with information about the event, our response, and additional measures you can take to help protect your information, should you feel it appropriate to do so.

What Happened? On or about March 12, 2024, we became aware of suspicious activity affecting certain systems within our network. In response, we took prompt steps to secure our network and engaged forensic specialists to investigate the event. We determined that there was unauthorized access to certain data within our network and on March 12, 2024, certain files were viewed and/or copied from our systems. In response, we undertook a comprehensive review of the potentially impacted files to determine what information was present and to whom it pertained. Based on these efforts, we recently confirmed your information was in the potentially affected files.

What Information Was Involved? The investigation determined that the potentially impacted information included your name and [Extra 2 – data elements].

What We Are Doing. Upon becoming aware of this event, we promptly began an investigation to determine the nature and scope of the event, took steps to secure our network, and notified federal law enforcement. As an added precaution, we are offering you access to 24 months of complimentary credit monitoring and identity restoration services through Experian. Details of this offer and instructions on how to enroll in the services may be found in the attached *Steps You Can Take to Help Protect Personal Information*.

What You Can Do. At this time, we are not aware of anyone experiencing fraud as a result of the event. In addition to enrolling in the complimentary monitoring services, 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. Please also review the attached *Steps You Can Take to Help Protect Personal Information*, which contains information on what you can do to safeguard against possible misuse of your information.

For More Information. If you have additional questions, please contact our dedicated assistance line at 1-833-918-1109 Monday through Friday from 9:00 am to 9:00 pm Eastern Time (excluding U.S. holidays). You may also write to CST at 7075 Samuel Morse Drive, Suite 250 Columbia, Maryland 21046.

Sincerely,

CST Engineering, Inc.

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M3512-L01

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Experian IdentityWorks

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this event 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 event (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 24 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 24-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: 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 event, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at _____ by January 31, 2025. Be prepared to provide engagement number as proof of eligibility for the Identity Restoration services by Experian.

Additional Details Regarding Your 24-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.¹
- **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 Insurance²:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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.

¹ Offline members will be eligible to call for additional reports quarterly after enrolling.

² 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.

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 their 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>.

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