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November 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 Spagnolo Gisness & Associates, Inc. (“SGA”) located at 99 High Street, 4th Floor, Boston, MA 02110, and are writing 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, SGA 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

SGA identified anomalous activity affecting certain servers in its network, promptly took steps to secure its environment and commenced an investigation to determine the nature and scope of the activity. Through the investigation, SGA determined that certain files stored on the network were copied during the period of unauthorized access between December 5 and December 17, 2023. Following this determination, SGA undertook a comprehensive review of the files determined to be at risk to assess the information contained therein and to whom it relates. On September 17, 2024, SGA completed this review. The information that could have been subject to unauthorized access includes name, Social Security number and driver's license or state identification number.

Notice to Maryland Resident

On November 12, 2024, SGA mailed 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, SGA moved quickly to investigate, assess the security of its systems, and identify potentially affected individuals. Further, SGA notified federal law enforcement of the event and implemented additional safeguards. SGA is providing individuals whose personal information was potentially affected by this incident with access to credit monitoring services for two (2) years, through Experian, at no cost to the individuals.

Additionally, SGA 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. SGA 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. SGA is providing written notice of this incident to relevant state regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4259.

Very truly yours,

A handwritten signature in black ink, appearing to read "Colin D. Scanlon".

Colin D. Scanlon of
MULLEN COUGHLIN LLC

CDS/sep
Enclosure

EXHIBIT A

SGA

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

November 12, 2024

M3852-L03-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L03 ADULT



APT ABC
123 ANY STREET
ANYTOWN, FC 1A2 B3C
COUNTRY



NOTICE OF SECURITY INCIDENT

Dear Sample A. Sample:

Spagnolo Gisness & Associates, Inc. (“SGA”) writes to inform you of an incident that may affect some of your information. This correspondence provides you with information about the incident, our response and steps you may take to help protect your information should you feel it is appropriate to do so.

What Happened? SGA identified anomalous activity affecting certain servers in our network. We promptly took steps to secure our environment and commenced an investigation to determine the nature and scope of the activity. Through the investigation, we determined that certain files stored on the network were copied during the period of unauthorized access between December 5 and December 17, 2023. Following this determination, we undertook a comprehensive review of the files determined to be at risk to assess the information contained therein and to whom it relates. On September 17, 2024, we completed this review and determined that your information was in the relevant files.

What Information Was Involved? The information potentially impacted by the incident related to you includes your: [Extra1].

What We Are Doing. We take this incident and the security of personal information entrusted to us very seriously. In response to this incident, we promptly began an investigation and took steps to secure our network. We also notified federal law enforcement of the event. SGA has security measures in place to protect information in our care and we continue to take steps to enhance the security of our systems.

As an added precaution, SGA has secured the services of Experian to provide you with access to complimentary credit monitoring and identity restoration services for 24 months. More information regarding the services and instructions regarding how to enroll can be found in the enclosed *Steps You Can Take to Help Protect Personal Information*.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring free credit reports for suspicious activity and to detect errors. We also encourage you to review the enclosed *Steps You Can Take to Help Protect Personal Information* and enroll in the credit monitoring and identity restoration services we are offering.

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For More Information. If you have questions, please call us at 833-704-9386, available Monday through Friday, from 9:00 a.m. to 9:00 p.m., Eastern Time, excluding major U.S. holidays. Or you can write to us at Spagnolo Gisness & Associates, Inc., 99 High Street, Floor 4, Boston, MA 02110.

Sincerely,

Spagnolo Gisness & Associates, Inc.

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 24 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 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: <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 833-704-9386 by January 31, 2025. Be prepared to provide engagement number B133820 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.*
- **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 ExtendCARE™:** 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 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 1 Rhode Island residents that may be impacted by this event.

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