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November 19, 2024

VIA EMAIL (IDTHEFT@OAG.STATE.MD.US)

Anthony G. Brown
Attorney General
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Incident Notification

Dear Attorney General Brown:

We are writing on behalf of our client, Emporium TPO LLC to notify your office of a cybersecurity incident that involved five Maryland residents' information.

Emporium TPO LLC recently concluded an investigation of an incident that involved unauthorized access to three employees' email accounts. Upon discovering the incident, the email accounts were immediately secured, and an investigation was launched. Through the investigation, it was determined that an unauthorized actor accessed the mailboxes on August 28, 2024 and August 29, 2024. The contents of the email mailboxes were reviewed, and on October 9, 2024, Emporium TPO LLC identified an email or attachment containing the names and Social Security numbers of five Maryland residents.

On November 18, 2024 Emporium TPO LLC sent notifications via U.S. First-Class mail to the Maryland residents in accordance with Md. Code Ann., Com. Law § 14-3504.¹ A copy of the notification is enclosed. Emporium TPO LLC is offering notice recipients one year of complimentary credit monitoring, fraud consultation, and identity theft restoration services through IDX.

Emporium TPO LLC has taken and will continue to take steps to enhance all security processes.

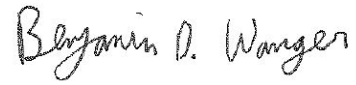
¹ This report does not waive any objections that Emporium TPO LLC may have that Maryland lacks regulatory authority over it related to any claims that may arise from this incident, or that Maryland lacks jurisdiction over it.

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Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Benjamin D. Wanger". The signature is written in a cursive, slightly slanted style.

Benjamin D. Wanger
Counsel

Enclosure



P.O. Box 989728
West Sacramento, CA 95798-9728

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>
<<Country>> or <<IMB>>

Enrollment Code: <<XXXXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://app.idx.us/account-creation/protect>

November 18, 2024

Dear <<First Name>> <<Last Name>>,

Emporium TPO LLC is committed to protecting the privacy and security of the information we maintain. We are writing to let you know we experienced a data security incident that may have involved some of your information. This notice explains the incident, the measures we have taken, and some steps you can take in response.

We recently concluded our investigation of an incident involving unauthorized email access. Upon discovering the incident, we promptly activated our incident response plan and launched an investigation into the nature and scope of the incident with assistance from external cybersecurity experts. Through our investigation, we determined that an unauthorized third-party accessed certain mailboxes on August 28, 2024 and August 29, 2024. We reviewed the contents of the email mailboxes and, on October 9, 2024, identified an email or attachment containing your name in combination with your <<variable data 1>>.

We are offering you a free one-year membership to credit monitoring and identity protection services through the company IDX. These identity protection services include one year of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. These services are completely free to you, and enrolling in this program will not hurt your credit score. **For more information on the services, including instructions on how to activate your complimentary one-year membership, please visit <https://app.idx.us/account-creation/protect> or call 1-833-903-3648 and use the Enrollment Code provided above. Please note the deadline to enroll is February 18, 2025.**

We encourage you to remain vigilant for incidents of fraud or identity theft by reviewing your financial account statements and credit report for unauthorized activity. For more information on identity protection as well as some additional steps you can take in response, please see the information attached to this letter.

We also have taken proactive measures to continue to enhance our security processes. If you have any questions about this incident, please call 1-833-903-3648, Monday through Friday, 9:00 a.m. to 9:00 p.m. EST, excluding major U.S. holidays.

Sincerely,
Emporium TPO LLC



1. Website and Enrollment. Scan the QR image or go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-833-903-3648 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll-free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-888-378-4329
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft, as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active-Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That is because most creditors need to see your credit report before they approve a new account. If they cannot see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must place a security freeze separately on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You will need to supply your name, address, date of birth, Social Security number, and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Emporium TPO can be reached by mail at 3010 Gaylord Pkwy Suite 125, Frisco, TX 75034 and by telephone at (877) 247-8877.

Additional information for residents of the following states:

Connecticut: You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

District of Columbia: You may contact and obtain information from your attorney general at: Office of the Attorney General for the District of Columbia, 400 6th Street, NW, Washington, DC 20001, 1-202-727-3400, www.oag.dc.gov

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.marylandattorneygeneral.gov/

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island: This incident involves 1 individual in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.

- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- Access to your file is limited.
- You must give your consent for reports to be provided to employers.
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.