



MULLEN
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426 W. Lancaster Avenue, Suite 200
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November 27, 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 Keesal, Young & Logan (“KYL”) located at The Waterfront at Catalina Landing, 310 Golden Shore, Long Beach, CA 90802, and are writing to notify your office of an incident that may affect the security of certain personal information relating to two thousand one hundred sixty-seven (2,167) Maryland residents. This notice may be supplemented with new significant facts learned subsequent to its submission. By providing this notice, KYL 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 June 13, 2024, KYL identified suspicious activity on its network and moved quickly to secure its environment. KYL immediately initiated an investigation with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Through the investigation, KYL determined that there was unauthorized access to its network between June 7 and June 13, 2024. While on the network, the unauthorized actor acquired certain information stored therein. Therefore, KYL undertook a comprehensive review of the data at risk to determine what information was at issue and to whom the information related. On October 28, 2024, KYL determined that information related to certain individuals could be impacted. The information that could have been subject to unauthorized access includes name, Social Security number, driver’s license number, financial account number, individual taxpayer identification number, health insurance information, and medical information.

Notice to Maryland Residents

On November 27, 2024, KYL provided written notice of this incident to two thousand one hundred sixty-seven (2,167) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***. The same day KYL also provided substitute notice of this incident on the homepage of its website and in major media outlets in all fifty (50) states. A copy of the website notice is attached hereto as ***Exhibit B*** and the media notice is attached hereto as ***Exhibit C***.

Other Steps Taken and To Be Taken

Upon discovering the event, KYL moved quickly to investigate, assess the security of its systems, and identify potentially affected individuals. Further, KYL notified federal law enforcement of the event and implemented additional safeguards. KYL is providing individuals whose personal information was potentially affected by this incident with access to credit monitoring services for twelve (12) months, through IDX, at no cost to the individuals.

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

KYL is providing notice of this incident to 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) 930-4259.

Very truly yours,

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

Colin D. Scanlon of
MULLEN COUGHLIN LLC

CDS:scs
Enclosure

EXHIBIT A



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

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

Enrollment Code: <<ENROLLMENT>>

To Enroll, Scan the QR Code Below:



Or Visit:

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

November 27, 2024

NOTICE OF [SECURITY INCIDENT] / [DATA BREACH]

Dear <<Full Name>>:

Keesal, Young & Logan (“KYL”) writes to inform you of an incident that may affect the security of some of your information. This letter provides an overview of the incident, our response, and steps you may take to better protect yourself should you wish to do so.

What Happened? On June 13, 2024, KYL identified suspicious activity on its network and moved quickly to secure its environment. KYL immediately initiated an investigation with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Through the investigation, we determined that there was unauthorized access to our network between June 7 and June 13, 2024. While on the network, the unauthorized actor acquired certain information stored therein. Therefore, KYL undertook a comprehensive review of the data at risk to determine what information was at issue and to whom the information related. On October 28, 2024, KYL determined that information related to you could be affected.

What Information Was Involved? The information that could have been impacted includes your name and the following types of information: <<Data Elements>>.

What We Are Doing. KYL takes the confidentiality, privacy, and security of information in its care very seriously. Upon discovering the incident, we took immediate steps to secure the network and strengthen our security posture moving forward. KYL is offering you access to complimentary credit monitoring and identity restoration services through IDX for <<twelve/twenty-four (12/24)>> months. The deadline to enroll in these services is February 27, 2025. Please note that you will need to enroll yourself in these services, as we are not able to do so on your behalf. You can find instructions regarding how to enroll in these services in the enclosed *Steps You Can Take to Protect Personal Information*.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Personal Information* which contains guidance regarding what you can do to better protect against possible misuse of your information. We also 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 over the next 12 to 24 months.

For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have questions, please call 1-866-932-9695, Monday through Friday from 6:00 a.m. to 6:00 p.m. Pacific Time. You may also write to KYL at The Waterfront at Catalina Landing, 310 Golden Shore, Long Beach, CA 90802.

Sincerely,

Keesal, Young & Logan

Steps You Can Take To Protect Personal Information

Enroll in Credit Monitoring and Identity Protection

1. Website and Enrollment. 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. Please note the deadline to enroll is February 27, 2025.
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.

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.

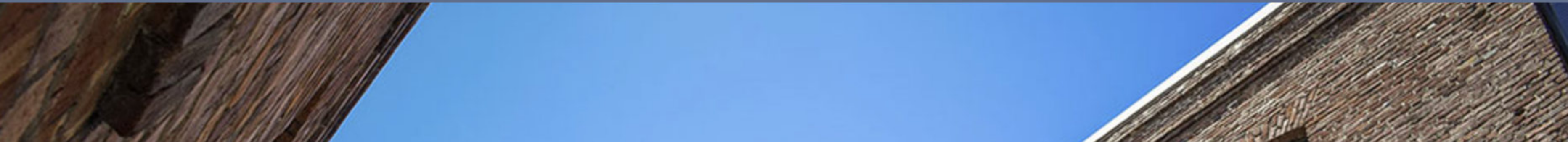
For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

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 364 Rhode Island residents that may be impacted by this event.

EXHIBIT B

Notice of Data Event



NOTICE OF DATA EVENT

November 27, 2024 – Keesal, Young & Logan ("KYL" or "We") recently discovered an incident that may have impacted the privacy of information related to certain individuals. As we continue to work toward notifying impacted individuals directly, we are providing information about the event, our response, and steps potentially impacted individuals can take to better protect their information should they feel it is appropriate to do so.

What Happened? On June 13, 2024, KYL identified suspicious activity on its network and moved quickly to secure its environment. KYL immediately initiated an investigation with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Through the investigation, we determined that there was unauthorized access to our network between June 7 and June 13, 2024. While on the network, the unauthorized actor acquired certain information stored therein. Therefore, KYL undertook a comprehensive review of the data at risk to determine what information was at issue and to whom the information related. On October 28, 2024, KYL determined that information related to individuals may have been impacted.

What Information was Affected? The types of potentially impacted information may include individuals' name, Social Security number, financial account information, driver's license number, passport number, government identification number, date of birth, medical information, health insurance information, taxpayer identification number, biometric information, and username / password.

How Will Individuals Know If They Are Affected By This Incident? KYL plans to mail notice letters to individuals whose personal information was contained in the data at issue and for whom they have a mailing address. If you did not receive a notice letter and believe you may have been impacted, you can call the dedicated assistance line referenced below.

What We are Doing. We take this event and the security of information in our care very seriously. Upon learning of this event, we immediately took steps to secure our network and implemented additional administrative and technical safeguards to further secure the information in our care. Notice was also provided to federal law enforcement.

What Affected Individuals Can Do. Potentially affected individuals are encouraged to remain vigilant against incidents of identity theft by reviewing their financial account statements and credit reports for unusual activity. Additional information can be found below in the **Steps You Can Take to Help Protect Your Information** and in the notification letters that will be sent to affected individuals.

For More Information. If you have questions, please call our dedicated assistance line at 1-866-932-9695, Monday through Friday from 6:00 a.m. to 6:00 p.m. Pacific Time. You may also write to KYL at The Waterfront at Catalina Landing, 310 Golden Shore, Long Beach, CA 90802.

Steps You Can Take to Help Protect Your Information

Monitor your credit reports for suspicious or unauthorized activity. 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.

Place a fraud alert on your credit file. 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.

Place a security freeze on your credit file. 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 security 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, military identification, 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 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, DC 20001; 1-202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For Massachusetts residents, Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your 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 your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You 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 you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/201504_ctpb_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; 1-401-274-4400; and www.riagri.gov. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.

EXHIBIT C

KEESAL, YOUNG & LOGAN PROVIDES NOTICE OF DATA EVENT

November 27, 2024 - Long Beach, California. Keesal, Young & Logan (“KYL”) experienced an incident that may have impacted the privacy of information related to certain individuals. As KYL continues to work toward notifying impacted individuals directly, KYL is providing information about the event, its response, and steps potentially impacted individuals can take to better protect their information should they feel it is appropriate to do so.

On June 13, 2024, KYL identified suspicious activity on its network and moved quickly to secure its environment. KYL immediately initiated an investigation with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Through the investigation, KYL determined that there was unauthorized access to their network between June 7 and June 13, 2024. While on the network, the unauthorized actor acquired certain information stored therein. Therefore, KYL undertook a comprehensive review of the data at risk to determine what information was at issue and to whom the information related. On October 28, 2024, KYL determined that information related to individuals may have been impacted. KYL plans to mail notification letters directly to potentially impacted individuals for whom it has a mailing address. The notification letters will include resources that individuals can reference to further protect their information.

The types of potentially impacted information may include individuals’ name, Social Security number, financial account information, driver’s license number, passport number, government identification number, date of birth, medical information, health insurance information, taxpayer identification number, biometric information, and username / password. KYL encourages potentially affected individuals to remain vigilant against incidents of identity theft by reviewing their account statements and credit reports for unusual activity.

Interested individuals can find additional information about the event at www.kyl.com.

Media contact:

Marilyn Whitcomb; datainquiries@kyl.com