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December 11, 2024

Via electronic-mail: *Idtheft@oag.state.md.us*

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

Re: Our Client: Simplify Compliance LLC
Matter: Data Security Incident

Dear Attorney General Brown:

We represent the Simplify Compliance LLC, headquartered in Brentwood, Tennessee, with respect to a data security incident described in more detail below.

This letter will serve to inform you of the nature of the security breach, the number of Maryland residents being notified, what information has been affected, and the steps that Simplify Compliance has taken to secure its systems. We have also enclosed hereto a sample of the notification letters sent to the affected individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

On or around October 23, 2024, an unauthorized party gained access to Simplify Compliance's network and acquired certain files from the organization's systems. Simplify Compliance promptly engaged a specialized third-party forensic incident response firm to assist with securing the environment and investigating the incident. On or around November 12, 2024, Simplify Compliance determined that some personal information was contained in the affected files. Simplify Compliance has since been taking steps to send notification letters to the affected individuals.

Simplify Compliance found that the incident affected individuals' name, address and social security number. As of this writing, Simplify Compliance has not received any reports of related identity theft in connection with the incident.

2. Maryland Residents Notified

A total of approximately sixty-six (66) residents of Maryland were affected by this security incident. Notification letters to these individuals were mailed on November 22, 2024 via first class mail, and included an offer of free credit monitoring. Sample copies of the notifications are included with this letter.

3. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me at Ryan.Cook@LewisBrisbois.com or 601.499.8128.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Cook", written in a cursive style.

Ryan M. Cook for
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: *Sample notification letter*

RMC

Simplify Compliance LLC
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998

Via First-Class Mail



November 22, 2024

Notice of Data Security Incident

Dear [REDACTED]:

We are writing to inform you of a recent data security incident experienced by Simplify Compliance that may have resulted in unauthorized access to your personal information. Simplify Compliance takes the privacy of your personal information seriously, and we want to provide you with resources you can use to protect your information. This letter contains information about the incident and about how to protect your personal information going forward.

What Happened:

Simplify Compliance recently detected and stopped a network security incident that involved an unauthorized party gaining access to our network environment. Upon detecting the incident, we promptly engaged third-party forensic specialists to assist us with securing the network environment and investigating the extent of unauthorized activity. We confirmed through our investigation that some personal information was compromised in the incident.

An investigation revealed that the following information may have been exposed: name, address, Social Security number. We maintain this information consistent with our employment practices, as you are a current employee of Simplify Compliance.

What We Are Doing:

Data security is among the highest priorities of Simplify Compliance, and we are committed to doing everything we can to protect the privacy and security of the personal information in our care. We have implemented measures to strengthen the security of our network environment even more going forward.

Additionally, we are providing you with access to Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services at no charge. These services provide you with alerts for twelve months from the date of enrollment when changes occur to your credit file. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout, a TransUnion company specializing in fraud assistance and remediation services.

What You Can Do:

To enroll in credit monitoring services at no charge, please log on to <https://bfs.cyberscout.com/activate> and follow the instructions provided. When prompted, please provide the following unique code to receive services: [REDACTED]. In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. Enrolling requires an internet connection and e-mail account and may not be available to individuals under the age of 18. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

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Also, you will need to reference the enrollment code above when calling or enrolling online, so please do not discard this letter.

For More Information:

Enclosed you will find additional materials regarding the resources available to you, and the steps you can take to further protect your personal information.

We recognize that you may have questions not addressed in this letter. Cyberscout representatives are available for 90 days from the date of this letter to assist you with questions related to this incident, Monday through Friday, 8:00 am to 8:00 pm Eastern time. Please call the help line 1-833-844-2215 and supply the representative with your unique code listed above.

We appreciate your understanding and patience as we work to address this incident and support you through this process.

Sincerely,

Simplify Compliance

Steps You Can Take to Help Protect Your Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone or online. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years.

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-800-525-6285

www.experian.com/fraud/center.html www.transunion.com/fraud-alerts <https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

Monitoring: You should always remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and by monitoring your credit report for suspicious or unusual activity.

Security Freeze: You have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742

TransUnion
P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-888-298-0045

www.experian.com/freeze/center.html www.transunion.com/credit-freeze <https://www.equifax.com/personal/credit-report-services/credit-freeze/>

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. Instances of known or suspected identity theft should also be reported to law enforcement.



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For residents of Iowa: State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Massachusetts: It is required by state law that you are informed of your right to obtain a 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 residents of New Mexico: State law advises you to review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. 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 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 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 violators. 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 at **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 residents of Oregon: State law advises you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Rhode Island: It is required by state law that you are informed of your right to file or obtain a police report in regard to this incident.

For residents of Arizona, Colorado, District of Columbia, Illinois, Maryland, New York, North Carolina, and Rhode Island: You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

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

Arizona Office of the Attorney General Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004 1-602-542-5025

Colorado Office of the Attorney General Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000 **www.coag.gov**

District of Columbia Office of the Attorney General - Office of Consumer Protection: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; **www.oag.dc.gov**

Illinois office of the Attorney General - 100 West Randolph Street, Chicago, IL 60601; 1-866-999-5630; **www.illinoisattorneygeneral.gov**

Maryland Office of the Attorney General - Consumer Protection Division: 200 St. Paul Place, 16th floor, Baltimore, MD 21202; 1-888-743-0023; **www.oag.state.md.us**

New York Office of Attorney General - Consumer Frauds & Protection: The Capitol, Albany, NY 12224; 1-800-771-7755; **<https://ag.ny.gov/consumer-frauds/identity-theft>**

North Carolina Office of the Attorney General - Consumer Protection Division: 9001 Mail Service Center, Raleigh, NC 27699; 1-877-566-7226; **www.ncdoj.com**

Rhode Island Office of the Attorney General - Consumer Protection: 150 South Main St., Providence RI 02903; 1-401-274-4400; **www.riag.ri.gov**