

Jason M. Schwent
T (312) 985-5939
F +13125177573
Email:jschwent@clarkhill.com

Clark Hill
130 E. Randolph Street, Suite 3900
Chicago, Illinois 60601
T (312) 985-5900
F (312) 985-5999

December 23, 2024

VIA ELECTRONIC MAIL

Office of the Attorney General
Identity Theft Unit
200 St. Paul Place
Baltimore, MD 21202
IDTheft@oag.state.md.us

Dear Attorney General Brown:

We represent Eagle Rock Wealth Management (“ERWM”) and Greenberg & Rapp Financial Group (“G&R”) with respect to a data security incident involving personal information described below. ERWM and G&R take the security of the information in its control seriously and is committed to answering any questions you may have about the data security incident, its response, and steps taken to prevent a similar incident from occurring in the future.

1. Nature of security incident.

On March 15th 2024, April 30th 2024, and June 18th 2024, ERWM and G&R experienced compromises within their email environment. ERWM and G&R implemented their incident response protocols and began an internal investigation. ERWM and G&R also engaged cybersecurity and data forensic specialists to assist with determining what occurred and whether any data was compromised. The investigation determined that personal information belonging to clients of ERWM and G&R were impacted. Types of information that were present on the ERWM and G&R systems for those clients include: names, addresses, dates of birth, driver’s license numbers, and Social Security numbers.

2. Number of residents affected.

One (1) Maryland resident was notified of the incident. A notification letter was sent to the potentially affected individual on December 23, 2024 (a copy of the form notification letter is enclosed as Exhibit A).

3. Steps taken in response to the incident.

Since the incident, ERWM and G&R have taken steps to prevent this kind of event in the future such as implementing an additional layer of training, changing passwords for email accounts, and reinforcing multi-factor authentication. Additionally, potentially affected individuals were offered 12 months of credit monitoring and identity protection services at no cost.

4. Contact Information

ERWM and G&R take the security of the information in its control seriously and is committed to ensuring it is appropriately protected. If you have any questions or need additional information, please do not hesitate to contact me at jschwent@clarkhill.com or (312) 985-5939.

Sincerely,

CLARK HILL

A handwritten signature in black ink, appearing to read 'JS', with a long horizontal line extending to the right.

Jason M. Schwent

JMS:mm



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
 <<address_1>>
 <<address_2>>
 <<city>>, <<state_province>> <<postal_code>>
 <<country>>

RE: NOTICE OF DATA SECURITY INCIDENT

Dear <<first_name>> <<last_name>>,

Greenberg & Rapp Financial Group, Inc. and Eagle Rock Wealth Management Inc (“G&R” and “ERWM”) is writing to let you know about a recent data security incident that may have impacted some of your information. We take the privacy and security of your information seriously, and sincerely apologize for any concern or inconvenience this may cause you. This letter contains information about steps you can take to help protect your information, and resources we are making available to help you.

What Happened?

On March 15th 2024, April 30th 2024, and June 18th 2024, ERWM and G&R experienced compromises within their email environment. On March 15th 2024 ERWM and G&R discovered the initial instance of suspicious activity in its email environment. We immediately implemented our incident response protocols, took steps to secure the email environment, and engaged independent computer forensic experts to assist with an investigation. While the investigation was underway, suspicious activity was found on another email account in our email environment. In total, the investigation found that there was unauthorized access to three (3) email accounts. The unauthorized user was able to access the accounts through use of a phishing email that contained links designed to reroute users to malicious websites. The contents of affected email accounts were reviewed to identify whether Personally Identifiable Information (“PII”) was present in the accounts. The review determined that your PII was present in the system at the time of the attack. G&R and ERWM have no evidence that your information was accessed, exfiltrated or misused, we wanted to make you aware of this incident out of an abundance of caution.

What Information Was Involved?

It appears that your <<b2b_text_1 (insert data elements)>> may have been affected.

What We Are Doing:

We have taken steps to prevent this kind of event in the future, such as implementing an additional layer of training and awareness, changing passwords for email accounts and reinforcing multi-factor authentication.

In addition, although there has been no evidence your information was misused, we are offering identity monitoring services through Kroll for <<Monitoring Term Length (Months)>> months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

What You Can Do:

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

This letter also provides other precautionary measures you can take to help protect your information. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. Kroll representatives have been fully versed on the incident and can answer questions or concerns you may have regarding this event.

For More Information:

If you have questions, please call (866) 676-0302, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Standard Time, excluding major U.S. holidays. Protecting your information is important to us, and we sincerely apologize for any concern this incident may cause you.

Sincerely,

Greenberg & Rapp Financial Group, Inc. and Eagle Rock Wealth Management Inc.

Recommended Steps to help Protect your Information

1. Website and Enrollment.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

2. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

You should also know that you have the right to file a police report if you ever 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 some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

3. Place Fraud Alerts with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. 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. The contact information for all three bureaus is as follows:

Credit Bureaus

Equifax Fraud Reporting
1-866-349-5191
P.O. Box 105069
Atlanta, GA 30348-5069
www.equifax.com

Experian Fraud Reporting
1-888-397-3742
P.O. Box 9554
Allen, TX 75013
www.experian.com

TransUnion Fraud Reporting
1-800-680-7289
P.O. Box 2000
Chester, PA 19022-2000
www.transunion.com

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well.

You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

Please Note: No one is allowed to place a fraud alert on your credit report except you.

4. Security Freeze. By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

5. You can obtain additional information about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

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 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 a 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. You can review your 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.

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

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392.

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400. A total of 0 Rhode Island residents were notified of this incident.

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.

KROLL

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you’ll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll’s activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.