



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Justin Schiff
Office: (267) 930-4256
Fax: (267) 930-4771
Email: jschiff@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

December 31, 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 Thompson Coburn LLP (“Thompson Coburn”) located at One US Bank Plaza, St. Louis, MO 63101. Thompson Coburn is a law firm that represents many different organizations and individuals across many different sectors. We write to notify your office of an event that may affect the security of certain personal information relating to approximately thirty-eight (38) Maryland residents. The vast majority, if not all of the impacted individuals are affiliated with Thompson Coburn’s clients, whose information was obtained by Thompson Coburn during the course of its representation of said clients.

This notice may be supplemented if significant new facts are learned subsequent to its submission. By providing this notice, Thompson Coburn 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 May 29, 2024, Thompson Coburn became aware of suspicious activity within their network. Thompson Coburn promptly launched an investigation into the nature and scope of the activity with the assistance of third-party forensic specialists. The investigation determined that certain information stored within their environment was viewed or taken by an unauthorized actor between May 28, 2024, and May 29, 2024. In response, Thompson Coburn undertook a comprehensive and time-intensive review of the affected files with the assistance of third-party specialists to identify what information was contained therein and to whom that information related. Through that

review, Thompson Coburn determined that certain information related to residents of Maryland was contained within the affected files and thus subject to unauthorized access and acquisition by the unauthorized actor.

Thompson Coburn's investigation and review determined the information subject to unauthorized access and acquisition by the unauthorized actor includes the impacted individual's name, Social Security number, USCIS or alien registration number, passport number, payment card number, and financial account information.

Notice to Maryland Residents

On or about May 31, 2024, Thompson Coburn began to provide preliminary notice of this event to some potentially impacted organizations while its comprehensive investigation into the event was ongoing. At that time, Thompson Coburn made some of the potentially impacted clients aware of the event, with the understanding that significant effort would be needed to review the impacted data, determine to which client it related, and identify impacted individuals affiliated with said client. Once those efforts completed, Thompson Coburn began to provide impacted organizations with formal notice of the event and an offer to provide notification services to potentially affected individuals on their behalf and at their direction, on or about November 22, 2024.

On December 31, 2024, Thompson Coburn began to provide written notice of this event to approximately thirty-eight (38) Maryland residents impacted by the event who are affiliated with some of Thompson Coburn's organization clients on their behalf.

Written notice is being provided to Maryland residents in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon becoming aware of the event, Thompson Coburn moved quickly to investigate and respond to the incident, assess the security of Thompson Coburn systems, and identify potentially affected individuals. Further, Thompson Coburn notified federal law enforcement regarding the event. Thompson Coburn is also working to implement additional safeguards and training to its employees. Thompson Coburn is providing access to credit monitoring services for one (1) year, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Thompson Coburn 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. Thompson Coburn 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

Office of the Attorney General

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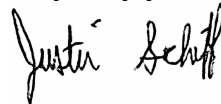
Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Thompson Coburn, on behalf of certain impacted organizations, is providing written notice of this event to appropriate governmental regulators, as necessary, and to the three nationwide consumer 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) 930-4256.

Very truly yours,

A handwritten signature in black ink, appearing to read "Justin Schiff". The signature is written in a cursive, slightly stylized font.

Justin Schiff of
MULLEN COUGHLIN LLC

JXS/jc2

Enclosure

EXHIBIT A

Secure Processing Center
25 Route 111, P.O. Box 1048
Smithtown, NY 11787

Postal Endorsement Line

<<Full Name>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<City>>, <<State>> <<Zip>>

<<Country>>

***Postal IMB Barcode

<<Date>>

NOTICE OF <<VARIABLE DATA 1>>

Dear <<Full Name>>:

Thompson Coburn LLP (“Thompson Coburn”) writes to inform you of an event that involves certain information related to individuals affiliated with <<Variable data 2>>. Thompson Coburn is a law firm that represents <<Variable data 2>> in various matters and was in possession of certain <<Variable data 2>> data that was impacted in this event as a result of their representation of <<Variable data 2>>. Although we are unaware of any identity theft or fraud occurring as a result of this event, we are providing you with information about the event, our response, and resources available to help you protect your information, should you feel it appropriate to do so.

What Happened? On May 29, 2024, Thompson Coburn became aware of suspicious activity within our network. We promptly launched an investigation into the nature and scope of the activity with the assistance of third-party forensic specialists. The investigation determined that certain information stored within our environment was viewed or taken by an unauthorized actor between May 28, 2024, and May 29, 2024. In response, Thompson Coburn undertook a comprehensive review of the affected files with the assistance of third-party specialists to identify what information was contained therein and to whom that information relates. Through that review, we determined that certain information related to you was contained within the affected files and thus subject to unauthorized access and acquisition by the unauthorized actor.

What Information Was Involved? Our investigation and review determined that your name and the following types of information related to you were found in the affected files: <<Breached Elements>>. Please note that Thompson Coburn is not aware of any attempted or actual misuse of your information, or that your information was used to commit identity theft or fraud.

What We Are Doing. The confidentiality, privacy, and security of information in our care is among our highest priorities. Upon becoming aware of the referenced suspicious activity, we promptly commenced an investigation to confirm the nature and scope of the event. We are reviewing existing security policies and have implemented additional cybersecurity measures to further protect against similar events moving forward. We are also notifying potentially impacted individuals, including you, so you may take steps to best protect your information, should you feel it is appropriate to do so.

As an added precaution, we are also offering you immediate access to credit monitoring and identity theft protection services for <<CM Duration>> months at no cost to you, through Equifax. You can find information on how to enroll in these services in the enclosed *STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION*. We encourage you to enroll in these services as we are not able to do so on your behalf.

What You Can Do. We 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 twelve (12) to twenty-four (24) months. You may also enroll in the complimentary credit monitoring services we are offering. Please also review the information contained in the enclosed *STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION*.

For More Information. We understand that you may have questions about this event that are not addressed in this letter. If you have additional questions, please call 855-295-4428 from 8:00 a.m. to 8:00 p.m. Central time, Monday through Friday, excluding major U.S. holidays. You may also write to us at One US Bank Plaza, St. Louis, MO 63101. We take this event very seriously and sincerely regret any inconvenience or concern this event may cause you.

Sincerely,

Thompson Coburn LLP

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring Services



Enter your Activation Code: <<ACTIVATION CODE>>
Enrollment Deadline: <<Enrollment Deadline>>

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate

Enter your unique Activation Code of <<ACTIVATION CODE>> then click “Submit” and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click “Continue”.

If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.

Once you have successfully signed in, you will skip to the Checkout Page in Step 4

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click ‘Sign Me Up’ to finish enrolling.

You’re done!

The confirmation page shows your completed enrollment.

Click “View My Product” to access the product features.

¹WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded. ²The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. ³Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com ⁴The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. 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 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 <<Rhode Island Count>> Rhode Island residents that may be impacted by this event.