Paul T. McGurkin, Jr.
Office: (267) 930-4788
Fax: (267) 930-4771
Email: pmcgurkin@mullen.law

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

November 18, 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 Vista Point Mortgage, LLC ("Vista Point") located at 1920 Main Street, Suite 200, Irvine, CA 92614, and are writing to notify your office of an incident that may affect the security of certain personal information relating to sixty-three (63) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Vista Point 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

Earlier this year, Vista Point discovered suspicious activity related to two (2) employees' email accounts. Vista Point immediately took steps to secure its systems and initiated an investigation into the nature and scope of the event. The investigation determined that the unauthorized user had access to the emails in the impacted accounts between May 21 and June 5. In response, Vista Point undertook a thorough review of the emails in the impacted accounts to determine what information was present and to whom it relates. Vista Point completed this review on September 27, 2024, and determined that certain sensitive information was located within the emails and attachments subject to unauthorized access.

The information that could have been subject to unauthorized access for Maryland residents includes name and Social Security number.

Notice to Maryland Residents

On November 18, 2024, Vista Point began providing written notice of this incident to sixty-three (63) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Vista Point moved quickly to investigate and respond to the incident, assess the security of Vista Point systems, and identify potentially affected individuals. Vista Point is also working to implement additional safeguards and training to its employees. Vista Point is providing access to credit monitoring services for one (1) year, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

Vista Point is providing written notice of this incident to relevant state and federal regulators, as necessary, and to the three (3) 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) 930-4788.

Very truly yours,

Paul T. McGurkin, Jr. of
MULLEN COUGHLIN LLC

PTM/jh2
Enclosure

EXHIBIT A

Vista Point Mortgage, LLC
P.O. Box 989728
West Sacramento, CA 95798-9728

Enrollment Code: <<ENROLLMENT>>
To Enroll, Scan the QR Code Below:

SCAN ME

Or Visit:
https://response.idx.us/VistaPointMortgage

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

November 18, 2024

NOTICE OF DATA <<Variable Text 1>>

Dear <<First Name>> <<Last Name>>:

Vista Point Mortgage, LLC ("Vista Point") is writing to inform you of a recent incident that may impact the security of some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with information about the incident, our response, and steps you may take to protect against any misuse of your information, should you feel it necessary to do so.

What Happened? Earlier this year, Vista Point discovered suspicious activity related to two (2) employees' email accounts. Vista Point immediately took steps to secure our systems and initiated an investigation into the nature and scope of the event. The investigation determined that the unauthorized user had access to the emails in the impacted accounts between May 21 and June 5. In response, Vista Point undertook a thorough review of the emails in the impacted accounts to determine what information was present and to whom it relates. Vista Point completed this review on September 27, 2024, and determined that information related to you was located within one of the emails or attachments subject to unauthorized access.

What Information Was Involved? The information contained in the impacted data included your name and the following information: <<Variable Text 2>>.

What We Are Doing. Vista Point takes the confidentiality, privacy, and security of information in its care very seriously. Upon discovering the issue, we immediately commenced an investigation to confirm the nature and scope, and to identify what information could have been affected. As an added precaution, we are offering you access to <<12/24>> months of complimentary credit monitoring and identity protection services through IDX at no cost to you. A description of the services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Protect Personal Information*. Please note that you must complete the enrollment process yourself as we are not permitted to enroll you in these services.

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. We further encourage you to enroll in the complimentary services being provided through IDX.

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 1-866-691-4359 from 6:00 AM to 6:00 PM Pacific Time, Monday through Friday (excluding holidays). You may also write to us at Vista Point Mortgage, LLC, 1920 Main Street, Suite 200, Irvine, CA 92614.

Sincerely,

Vista Point Mortgage

Steps You Can Take To Protect Personal Information

Enroll in Monitoring Services

Website and Enrollment. Scan the QR image or go to https://response.idx.us/VistaPointMortgage and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

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.

Telephone. Contact IDX at 1-866-691-4359 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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, 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. 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, DC 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, DC 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 17 Rhode Island residents that may be impacted by this event.

Paul T. McGurkin, Jr.
Office: (267) 930-4788
Fax: (267) 930-4771
Email: pmcgurkin@mullen.law

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

March 19, 2025

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: Supplemental Notice of Data Event

To Whom It May Concern:

We continue to represent Vista Point Mortgage, LLC ("Vista Point") located at 1920 Main Street, Suite 200, Irvine, CA 92614, and are writing to provide you with a supplemental notice to the initial notice which was provided on November 18, 2024. By providing this notice, Vista Point 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

Last year, Vista Point discovered suspicious activity related to two (2) employees' email accounts. Vista Point immediately took steps to secure its systems and initiated an investigation into the nature and scope of the event. The investigation determined that the unauthorized user had access to the emails in the impacted accounts between May 21 and June 5, 2024. In response, Vista Point undertook a thorough review of the emails in the impacted accounts to determine what information was present and to whom it relates. Vista Point completed this review on January 31, 2025, and determined that certain sensitive information was located within the emails and attachments subject to unauthorized access. Since that time, Vista Point continued to look for addresses for additional individuals so that notice could be completed.

The information that could have been subject to unauthorized access for the additional Maryland residents includes name, Social Security number and taxpayer identification number.

Notice to Maryland Residents

On March 19, 2025, Vista Point provided written notice of this incident to an additional twenty-seven (27) Maryland residents. The total number of Maryland residents notified is ninety (90). Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

As noted previously, upon discovering the event, Vista Point moved quickly to investigate and respond to the incident, assess the security of Vista Point systems, and identify potentially affected individuals. Vista Point is also working to implement additional safeguards and training to its employees. Vista Point is providing access to credit monitoring services for one (1) year, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

Vista Point is providing written notice of this incident to relevant state regulators, as necessary, and to the three (3) 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) 930-4788.

Very truly yours,

Paul T. McGurkin, Jr. of
MULLEN COUGHLIN LLC

PTM/jh2
Enclosure

EXHIBIT A

Vista Point Mortgage, LLC

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

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

Enrollment Code:<<XXXXXXXX>>
To Enroll, Scan the QR Code Below:

SCAN ME

Or Visit:
https://response.idx.us/VistaPointMortgage

March 19, 2025

NOTICE OF DATA <<VARIABLE DATA 1>>

Dear <<First Name>> <<Last Name>>:

Vista Point Mortgage, LLC ("Vista Point") is writing to inform you of a recent incident that may impact the security of some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with information about the incident, our response, and steps you may take to protect against any misuse of your information, should you feel it necessary to do so.

What Happened? Last year, Vista Point discovered suspicious activity related to two (2) employees' email accounts. Vista Point immediately took steps to secure our systems and initiated an investigation into the nature and scope of the event. The investigation determined that the unauthorized user had access to the emails in the impacted accounts between May 21 and June 5, 2024. In response, Vista Point undertook a thorough review of the emails in the impacted accounts to determine what information was present and to whom it relates. Vista Point completed this review on January 31, 2025, and determined that information related to you was located within one of the emails or attachments subject to unauthorized access.

What Information Was Involved? The information contained in the impacted data included your name and the following information: <<Variable Data 2>>.

What We Are Doing. Vista Point takes the confidentiality, privacy, and security of information in its care very seriously. Upon discovering the issue, we immediately commenced an investigation to confirm the nature and scope, and to identify what information could have been affected. As an added precaution, we are offering you access to <<Membership Offering Length>> months of complimentary credit monitoring and identity protection services through IDX at no cost to you. A description of the services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Protect Personal Information*. Please note that you must complete the enrollment process yourself as we are not permitted to enroll you in these services.

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. We further encourage you to enroll in the complimentary services being provided through IDX.

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 1-866-691-4359 from 6:00 a.m. to 6:00 p.m. Pacific Time, Monday through Friday (excluding holidays). You may also write to us at Vista Point Mortgage, LLC, 1920 Main Street, Suite 200, Irvine, CA 92614.

Sincerely,

Vista Point Mortgage

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

- **Website and Enrollment.** Scan the QR image or go to https://response.idx.us/VistaPointMortgage and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

- **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.

- **Telephone.** Contact IDX at 1-866-691-4359 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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	1-833-799-5355
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, 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. 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, DC 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 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 3 Rhode Island residents that may be impacted by this event.