



MULLEN
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January 7, 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: Notice of Data Incident

To Whom It May Concern:

We represent CrossCheck, Inc. ("CrossCheck") located at 1440 North McDowell Blvd., Petaluma, CA 94954, and are writing to notify your office of an event that may affect the security of certain personal information relating to one (1) Maryland resident. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CrossCheck 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 20, 2024, CrossCheck observed unexpected activity within CrossCheck's merchant portal. CrossCheck promptly launched an investigation into the nature and scope of the activity. The investigation determined that, between May 18, 2024 to May 20, 2024, an unauthorized actor accessed CrossCheck's merchant portal and certain limited data accessible in the portal. CrossCheck undertook a comprehensive review of the accessible data to confirm what information it contained and to whom the information related. CrossCheck undertook a further review of its internal files to locate available address information that would enable it to notify those individuals. The combined reviews were completed on December 3, 2024, and confirmed that the accessible dataset contained certain Maryland resident information.

The information in the accessible dataset varies by individual and includes name and driver's license number.

Notice to Maryland Resident

On January 7, 2025, CrossCheck provided written notice of this event to one (1) Maryland resident. 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 observing unexpected activity, CrossCheck moved quickly to investigate and respond to the event, assess the security of CrossCheck systems, and identify potentially affected individuals. Further, CrossCheck notified federal law enforcement regarding the event. CrossCheck is providing access to credit monitoring services for 12 months, through Experian, to notified individuals, at no cost to these individuals.

Additionally, CrossCheck is providing notified 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. CrossCheck is providing those individuals with information on how to place fraud alerts and credit freezes on their credit files, 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.

CrossCheck is providing written notice of this event to relevant regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the event, please contact us at (267) 930-2303.

Very truly yours,

Lynda Jensen of
MULLEN COUGHLIN LLC

LRJ/jrl
Attachment

EXHIBIT A



1 1 1 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



January 7, 2025

NOTICE OF [Extra3]

Dear Sample A. Sample:

CrossCheck, Inc. (“CrossCheck”) writes to inform you of an event that may involve some of your information. This notice provides information about the event and our response, what you can do to protect your information from possible misuse and contact procedures for you to ask questions or obtain additional information about this event.

What Happened. On May 20, 2024, CrossCheck observed unexpected activity within CrossCheck’s merchant portal. CrossCheck promptly launched an investigation into the nature and scope of the activity. The investigation determined that, between May 18, 2024 to May 20, 2024, an unauthorized actor accessed CrossCheck’s merchant portal and certain limited data accessible in the portal. CrossCheck undertook a comprehensive review of the accessible data to confirm what information it contained and to whom the information related. CrossCheck undertook a further review of its internal files to locate available address information that would enable it to notify those individuals. The combined reviews were completed on December 3, 2024. We are notifying you because our investigation determined that the accessible dataset contained some of your information.

What Information Was Involved. The investigation determined that the accessible dataset contained the following information related to you: your name, [Extra1].

What We Are Doing. Upon observing unexpected activity, we quickly took steps to respond, which included identifying and addressing the source of the activity and reviewing and enhancing our existing policies and procedures related to network security. CrossCheck also reported this event to federal law enforcement and is notifying individuals and regulators, as required. As an added precaution, CrossCheck is offering notified individuals access to 12 months of complimentary credit monitoring. Instructions on how to enroll in these services can be found below.

What You Can Do. As a best practice, 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. You may also review the information and resources, including how to enroll in complimentary credit monitoring, in the below “Steps You Can Take to Help Protect Personal Information.”

For More Information. If you have questions, please call our dedicated assistance line at 1-866-566-2481 (toll free), Monday through Friday, from 9:00 am to 9:00 pm Eastern Time (excluding U.S. holidays). You may write to CrossCheck at P.O. Box 6008, Petaluma, CA 94955, Attn: Legal Dept.

Sincerely,

CrossCheck, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 12 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 12-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by March 31, 2025** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-866-566-2481 by March 31, 2025. Be prepared to provide engagement number B136187 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*¹
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. 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 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 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 fraud alert or a 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

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 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/>. You may write to CrossCheck at P.O. Box 6008, Petaluma, CA 94955, Attn: Legal Dept. or call CrossCheck at 1-866-654-3369.