SHOOK HARDY & BACON

January 23, 2025

Jonathan L. Wilson

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VIA email to idtheft@oag.state.md.us
Office of the Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202

RE: Stock Development - Security Incident

Dear Sir/Madam:

I am writing on behalf of Stock Development, a Florida real estate developer and builder of residential and commercial properties, to notify you of a security incident involving the personal information for 160 Maryland residents.

On March 2, 2024, Stock Development identified suspicious activity on its network systems and immediately took steps to begin investigating the incident and securing its environment. Stock Development promptly engaged Shook, Hardy & Bacon as outside counsel, and Shook, in turn, engaged a leading digital-forensics firm to assist in the investigation. The investigation subsequently determined that an unauthorized third party gained access to Stock Development's systems from April 25, 2023, to March 2, 2024.

Once it was determined that files containing personal information were affected, a data-review firm was engaged to determine what personal information was in those files, and the results of that review were received on October 21, 2024. Since then, Shook has been diligently working with Stock Development to identify the correct addresses for the affected individuals and assess notification obligation. The investigation identified the following types of personal information: names, dates of birth, financial account information, and government identification numbers (such as a driver's license number or Social Security number).

Consistent with its obligations under state law, Stock Development is mailing written notice to the affected individuals in Maryland starting on January 24, 2025, and we have attached templates of those notification letters for your review. For individuals receiving notice whose Social Security number or driver's license number was impacted, Stock Development is providing a complimentary one-year membership to Experian IdentityWorks credit monitoring. A toll-free call center has also been established to field any questions individuals have about the incident.

In addition to providing notice, Stock Development has taken a variety of measures to bolster the security of its systems. For example, Stock Development has changed/strengthened passwords, decommissioned the affected servers, migrated the legacy file storage to cloud based platforms, and adopted additional technical safeguards. Law enforcement was also notified.

Please contact me if you have any questions or need any additional information regarding this incident.

Sincerely,

Jonathan Wilson
Senior Counsel

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 DATA BREACH

Dear <<Full Name>>,

Stock Development is writing to inform you about an incident that may have exposed your personal information to unauthorized persons. We are reaching out to provide you information on the incident and an opportunity to enroll in free credit monitoring.

WHAT HAPPENED

On March 2, 2024, we became aware of unusual activity on our network. We promptly began working with cybersecurity experts to investigate and subsequently determined that an unauthorized third party gained access to a portion of our computer network. Based on our investigation, we believe they had access from April 25, 2023 to March 2, 2024. Once we identified the data that may have been affected, we promptly engaged a data review firm to determine what information was in those files. We received those results in late October, and since then, we have been working to identify the correct addresses for the affected individuals.

WHAT INFORMATION WAS INVOLVED

Our investigation determined that some combination of the following types of personal information related to you may have been impacted: full name, date of birth, contact information, government identification number (such as your Social Security number or driver's license number), and financial information (such as your bank account and routing number).

WHAT WE ARE DOING

We hired third-party experts to address this situation, perform an investigation into the unauthorized activity, and further secure our systems to protect your information. We also notified law enforcement, which did not delay this notice.

WHAT YOU CAN DO

We have no evidence that any of your information has been used for identity theft or financial fraud as a result of this incident. Nonetheless, we encourage you to remain vigilant for any signs of unauthorized financial activity and to review the *Additional Steps You Can Take* guidance included in this letter for steps you can take to protect yourself. In addition, we are offering a complimentary <<CM Duration>> membership to Experian's IdentityWorks. This product helps detect possible misuse of personal information. To register, please:

- Ensure that you **enroll by:** <<Enrollment Deadline>> (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: https://www.experianidworks.com/3bcredit
- Provide your **activation code:** <<Activation Code>>

If you have questions or want an alternative to enrolling in Experian IdentityWorks online, please contact Experian at 877-288-8057 by <<Enrollment Deadline>> and provide them engagement number <<Engagement Number>>.

FOR MORE INFORMATION

We have established a toll-free call center to support you and answer your questions. You can contact the call center at 888-458-9756, Monday through Friday from 9 am to 9 pm ET, excluding holidays, and one of our representatives will be happy to assist you. We appreciate your patience as we work through this process.

Sincerely,

Stock Development, LLC
2639 Professional Circle, Suite 101
Naples, FL 34119

ADDITIONAL STEPS YOU CAN TAKE

Remain vigilant – We encourage you to remain vigilant for fraud or identity theft by reviewing your account statements and free credit reports. You can also find additional suggestions at www.IdentityTheft.gov/.

- You should confirm that your credit card company has the correct address on file for you and that all charges on the account are legitimate. If you discover errors or suspicious activity, you should immediately contact the credit card company and inform them that you have received this letter.
- You should obtain and review a free copy of your credit report by visiting www.annualcreditreport.com or calling (877) 322-8228. If the report is incorrect, you should contact the appropriate consumer reporting agency—Equifax, Experian, or TransUnion.

Consider placing a fraud alert or security freeze on your credit file – Consumer reporting agencies have tools you can use to protect your credit, including fraud alerts and security freezes.

- A fraud alert is a cautionary flag you can place on your credit file to notify companies extending you credit that they should take special precautions to verify your identity. A fraud alert is free and will stay on your credit report for one (1) year, but you can renew it. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. You can contact any of the three consumer reporting agencies to place fraud alerts with each agency. Additional information is available at www.annualcreditreport.com.
- A security freeze is a more dramatic step that will prevent others from accessing your credit report, which will prevent them from extending you credit. You must contact each consumer reporting agency separately to order a security freeze, and they may require you to provide them with your full name, Social Security number, date of birth, and current and previous addresses. You can obtain more information about security freezes by contacting the consumer reporting agencies or the Federal Trade Commission. There is no fee for requesting, temporarily lifting, or permanently removing a security freeze with any of the consumer reporting agencies.

Report suspicious activity – If you believe you are the victim of identity theft, consider (1) notifying your Attorney General, local law enforcement, or the Federal Trade Commission; (2) filing a police report and requesting a copy of that report; and (3) visiting www.IdentityTheft.gov/ to report the issue and get recovery steps.

Contact relevant authorities – You may contact the below resources to (1) get more information on fraud alerts or security freezes and (2) learn more about protecting yourself from fraud or identity theft.

Federal Trade Commission	**Equifax**	**Experian**	**TransUnion**
600 Pennsylvania Ave. NW Washington, DC 20580 (202) 326-2222 www.ftc.gov	P.O. Box 740241 Atlanta, GA 30374 (800) 685-1111 www.equifax.com	P.O. Box 9701 Allen, TX 75013 (888) 397-3742 www.experian.com	P.O. Box 2000 Chester, PA 19016 (888) 909-8872 www.transunion.com

For Maryland Residents: the Maryland Attorney General may be contacted at: Office of the Attorney General, 200 St. Paul Place, 25th Floor, Baltimore, MD 21202; (888) 743-0023; 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; 1-800-771-7755; www.ag.ny.gov.

For North Carolina Residents: the North Carolina Attorney General may be contacted at: Office of the Attorney General, 9001 Mail Service Center, Raleigh, NC 27669; (919) 716-6400; 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 (401) 274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 79 Rhode Island residents impacted by this incident.

For Washington, D.C. Residents: the District of Columbia Attorney General may be contacted at: Office of the Attorney General, 400 6th Street, NW, Washington, D.C. 20001; (202) 727-3400; https://oag.dc.gov/.

You can also find your Attorney General's contact information at: https://www.usa.gov/state-attorney-general.

Review the Fair Credit Reporting Act – You also have certain rights under the Fair Credit Reporting Act (FCRA), including the right to know what is in your file, to dispute incomplete or inaccurate information, and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit:
https://www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.

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<<Full Name>>
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<<Address 3>>
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<<Country>>
***Postal IMB Barcode

<<Date>>

NOTICE OF DATA BREACH

Dear <<Full Name>>,

Stock Development is writing to inform you about an incident that may have exposed your personal information to unauthorized persons. Stock Development is providing this notice to give you more information on what happened and what we are doing in response.

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WHAT WE ARE DOING

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WHAT YOU CAN DO

Enclosed with this letter you will find steps you can take to protect yourself. If you have questions about this matter, please call us at the phone number below.

FOR MORE INFORMATION

We have established a toll-free call center to support you and answer your questions. You can contact the call center at 888-458-9756, Monday through Friday from 9 am to 9 pm ET, excluding holidays, and one of our representatives will be happy to assist you. We appreciate your patience as we work through this process.

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https://www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.