



MULLEN
COUGHLIN^{LLC}
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January 28, 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 Event

To Whom It May Concern:

We represent 2Gether Financial Services Inc. ("2Gether") located at 3901 Indigo Road, Groveland, Florida 34736, write to provide your Office with notice of an event that may affect information related certain Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, 2Gether 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 or about August 7, 2023, 2Gether became aware of unusual activity involving its third-party tax software company. 2Gether began an investigation to determine the nature and scope of the activity. The investigation determined that there was unauthorized access to 2Gether's computer systems on August 1, 2023. Due to the nature of the data within the computer systems, and because the investigation could not rule out the possibility of access and/or exfiltration of personal information, 2Gether conducted a comprehensive programmatic and manual review of the data within the systems, with the assistance of third-party review specialists, in order to determine the type of information that may have been impacted and to whom it related.

Following completion of time-intensive programmatic and manual reviews, 2Gether then began reviewing its internal records to complete data attribution and to obtain address information in order to determine the notification population, to identify the involved 2Gether clients, and to

provide notification to client data owners and individuals. The personal information that may have been involved related to Maryland residents includes name, Social Security number, driver's license number, and financial account information.

Notice to Maryland Residents

On or about January 28, 2025, 2Gether provided written notice of this incident to seven (7) 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, 2Gether moved quickly to investigate and respond to the incident, assess the security of its systems, and identify potentially affected clients and individuals. 2Gether is also working to implement additional safeguards and training. 2Gether is providing access to credit monitoring services for twelve (12) months, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, 2Gether is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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. 2Gether is also providing written notice of this incident to relevant regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4637.

Very truly yours,



Gregory Lederman of
MULLEN COUGHLIN LLC

GCL/prs
Enclosure

EXHIBIT A

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

January 28, 2025



M7503-L01-0000001 P001 T00001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 ADULT

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



[Notice of Data Breach]

Dear Sample A. Sample:

2Gether Financial Services, Inc., formerly known as Tax Smart Financial Services Inc. (“2Gether”) is writing to notify you of an incident that may affect your information. This notice provides you with information about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it is necessary to do so.

What Happened? On August 7, 2023, 2Gether became aware of suspicious activity potentially involving certain services. We began an investigation into this activity and determined that certain computer systems were accessed by an unknown individual on or around August 1, 2023. Out of an abundance of caution, we began a comprehensive review of the files from the involved systems to identify what specific information was present in the systems and to whom it relates. 2Gether also notified the IRS and provided them with information about the incident.

What Information Was Involved? Following the initial review, we worked to confirm necessary address information to prepare for notification, which was recently completed. This review determined that the following information was present in the potentially impacted systems at the time of the incident: your name, [Data Elements].

What We Are Doing. We take this event and the security of information in our care very seriously. Upon learning of the suspicious activity, we took steps to confirm the security of our network, undertook a review of the relevant files and systems, and are notifying potentially affected clients and individuals. As part of our ongoing commitment to your privacy and the security of information in our care, 2Gether will continue to review existing policies and procedures.

As an added precaution, we are offering 12 months of complimentary credit monitoring and identity protection services through Experian. If you wish to activate these services, you may follow the instructions included in the below *Steps You Can Take to Help Protect Information*.

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 at least the next 12 to 24 months. Suspicious activity should be promptly reported to relevant parties, including your financial institution and taxing authority. Additional information and resources may be found below in the *Steps You Can Take to Help Protect Information* section of this notice.

For More Information. If you have additional questions or concerns, please feel free to call our designated call center at 833-931-5335. We are available Monday through Friday from 8 am – 8 pm Central (excluding major U.S. holidays).

Sincerely,

2Gether Financial Services, Inc.

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M7503-L01

STEPS YOU CAN TAKE TO HELP PROTECT 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 April 30, 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 833-931-5335 by April 30, 2025. Be prepared to provide engagement number B138618 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.*
- **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.

General Guidance

Tax Return Guidance. You can contact the IRS at www.irs.gov/Individuals/Identity-Protection for helpful information and guidance on steps you can take to prevent a fraudulent tax return from being filed in your name and what to do if you become the victim of such fraud. You can also visit www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft for more information.

You should also look to the information made available by the tax authority for your state of residence and any other state where you file a tax return. For a list of websites for each US state's tax authority, visit <http://www.taxadmin.org/state-tax-agencies>.

Internal Revenue Service Identity Protection PIN (IP PIN). You may also obtain an Identity Protection PIN (IP PIN) from the Internal Revenue Service, a six-digit number that prevents someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. The IP PIN is known only to you and the IRS, and helps the IRS verify your identity when you file your electronic or paper tax return. Even though you may not have a filing requirement, an IP PIN still protects your account. If you do not already have an IP PIN, you may get an IP PIN as a proactive step to protect yourself from tax-related identity theft either online, by paper application or in-person. Information about the IP PIN program can be found here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

You will receive a new IP PIN in the mail each year from the IRS. Please be sure to include this information when bringing in your tax information.

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 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/>. 2Gether is located at 836 W Desoto St Suite 3C, Clermont, Florida 34711.

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.