



MULLEN
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February 14, 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 Xactus LLC (“Xactus”) located at 370 Reed Rd. Ste. 100, Broomall, PA 19008 and are writing to notify your office of an incident that may affect the security of certain personal information relating to ninety-six (96) Maryland residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Xactus 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 July 15, 2024, Xactus identified suspicious activity in its email tenant and moved quickly to secure its environment. Xactus immediately initiated an investigation with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Through the investigation, Xactus determined that there were intermittent periods of unauthorized access to a single email account between June 26, 2024, and July 15, 2024. While the unauthorized actor was detected and removed within an hour of discovery, the investigation revealed that the unauthorized actor acquired information stored in this email box. Therefore, Xactus retained a third-party e-discovery firm to complete a comprehensive review of the data which may be at risk to determine what information was at issue and to whom the information related. Xactus completed this review on November 25, 2024, and began to seek out address information for affected individuals. On January 15, 2025, Xactus completed its search for address information so that direct notice could be provided to impacted individuals.

The information that could have been subject to unauthorized access includes name, Social Security number, financial account number, and driver's license number.

Notice to Maryland Residents

On or about February 14, 2025, Xactus provided written notice of this incident to ninety-six (96) 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, Xactus moved quickly to investigate and respond to the incident, assess the security of Xactus systems, and identify potentially affected individuals. Xactus is providing access to credit monitoring services for twenty-four (24) months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

Xactus is providing written notice of this incident to relevant state regulators, as necessary, and to the three 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) 930-2085.

Very truly yours,

A handwritten signature in black ink, appearing to read 'T Moran', is enclosed in a rectangular box.

Thomas Moran of
MULLEN COUGHLIN LLC

TAM:scs
Enclosure

EXHIBIT A



Advancing the Modern Mortgage
P.O. Box 989728
West Sacramento, CA 95798-9728

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

Enrollment Code: <<XXXXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://app.idx.us/account-creation/protect>

February 14, 2025

NOTICE OF <<SECURITY INCIDENT>> / <<DATA BREACH>>

Dear <<First Name>> <<Last Name>>,

Xactus LLC (“Xactus”) writes to inform you of an incident that may affect the security of some of your information. This letter provides an overview of the incident, our response, and steps you may take to better protect yourself should you wish to do so.

What Happened? On July 15, 2024, Xactus identified suspicious activity in its email tenant and moved quickly to secure its environment. Xactus immediately initiated an investigation with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Through the investigation, we determined that there were intermittent periods of unauthorized access to one email account between June 26, 2024, and July 15, 2024. While the unauthorized actor was detected and removed within an hour of discovery, the investigation revealed that the unauthorized actor acquired certain information stored in this account. Therefore, Xactus retained a third-party e-discovery firm to complete a comprehensive review of the data which may be at risk to determine what information was at issue and to whom the information related. On November 25, 2024, Xactus determined that information related to you could be affected and worked to gather sufficient address information so that direct notice could be provided to potentially impacted individuals. On January 15, 2025, Xactus completed its’ search for address information so that direct notice could be provided to impacted individuals.

What Information Was Involved? The information that could have been impacted includes your name and the following types of information: <<Data Elements>>.

What We Are Doing. Xactus takes the confidentiality, privacy, and security of information in its care very seriously. Upon discovering the incident, we took immediate steps to secure the network and strengthen our security posture moving forward. Xactus is offering you access to complimentary credit monitoring and identity restoration services through IDX for twenty-four (24) months. The deadline to enroll in these services is May 14, 2025. Please note that you will need to enroll yourself in these services, as we are not able to do so on your behalf. You can find instructions regarding how to enroll in these services in the enclosed *Steps You Can Take to Protect Personal Information*.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Personal Information* which contains guidance regarding what you can do to better protect against possible misuse of your information. We also 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 12 to 24 months.

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 1-833-903-3648. Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time. You may also go to <https://app.idx.us/account-creation/protect> or write to Xactus Attn: Legal Department at 370 Reed Rd Ste. 100, Broomall, PA 19008.

Sincerely,

Xactus LLC
(Enclosure)

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

1. Website and Enrollment. Scan the QR image or go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

2. 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.

3. Telephone. Contact IDX at 1-833-903-3648 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, 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/>. You may write to Xactus, Attn: Legal Department at 370 Reed Rd Ste. 100, Broomall, PA 19008.

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 Massachusetts residents, Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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. You may write to Xactus, Attn: Legal Department at 370 Reed Rd Ste. 100, Broomall, PA 19008.

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 11 Rhode Island residents that may be impacted by this event.