



MULLEN  
COUGHLIN<sup>LLC</sup>  
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February 25, 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 Zullas LC dba Café Zupas LC (“Café Zupas”) located at 460 West Universal Circle, Sandy, Utah 84070, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately six (6) Maryland residents. By providing this notice, Café Zupas 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**

Café Zupas recently learned of suspicious activity within its computer network. Upon learning of the suspicious activity, Café Zupas immediately took steps to secure their systems, and launched an investigation into the nature and scope of the activity with the assistance of third-party cybersecurity and data privacy specialists. The investigation determined that an unauthorized actor accessed Café Zupas’ network at various times between October 21, 2024 and October 23, 2024, and certain information contained within those systems was viewed or copied by the unauthorized actor during that time. Café Zupas therefore undertook a comprehensive and time-intensive review of the data at risk to determine what information was potentially affected, to whom that information related, and to locate last known address information for impacted individuals. Those efforts recently completed, and Café Zupas provided notification to impacted individuals, as well as your office.

The information related to Maryland residents that could have been involved includes name and Social Security number.

### **Notice to Maryland Residents**

On February 25, 2025, Café Zupas provided written notice of this event to approximately six (6) 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 becoming aware of the event, Café Zupas moved quickly to investigate and respond to the same, assess the security of Café Zupas systems, and identify potentially affected individuals. Café Zupas is also cooperating with federal law enforcement's investigation into the event. Café Zupas is working to implement additional safeguards and training to its employees.

Further, Café Zupas is providing 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, 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.

Café Zupas 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) 930-4256.

Very truly yours,

Justin Schiff of  
MULLEN COUGHLIN LLC

JXS/sph  
Enclosure

# **EXHIBIT A**

# Café Zupas

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

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

February 25, 2025

## NOTICE OF <<Variable Text 1:SECURITY INCIDENT/DATA BREACH>>

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

Zullas LC dba Café Zupas LC (“Café Zupas”) writes to inform you of a recent event that may affect the privacy of some of your information. Although we are unaware of any identity theft or fraud in relation to the event, we are providing you with information about the event, our response, and resources available to help you protect your information, should you feel it appropriate to do so.

**What Happened?** Café Zupas recently learned of suspicious activity within our computer network. Upon learning of the suspicious activity, we immediately took steps to secure our systems and launched an investigation into the nature and scope of the activity with the assistance of third-party cybersecurity and data privacy specialists. The investigation determined that an unauthorized actor accessed our network at various times between October 21, 2024 and October 23, 2024, and that during that time period, certain information contained within our computer network was viewed or copied by the unauthorized actor. Café Zupas therefore undertook a comprehensive and time-intensive review of the data at risk to determine what information was potentially affected, and to whom that information related. Those efforts recently completed, and Café Zupas is notifying you because the investigation determined that certain information relating to you was contained within the impacted files.

**What Information Was Involved?** The following types of information related to you were found in the impacted files: your name and Social Security number. At this time, Café Zupas is not aware of your information being used to commit identity theft or fraud in relation to this event.

**What We Are Doing.** We take this event seriously, and the confidentiality, privacy, and security of information in our care is among our highest priorities. Upon learning of this event, we moved quickly to investigate and respond, assess the security of our network, and notify affected individuals. As part of our ongoing commitment to information security, we are also reviewing existing security policies and have implemented additional cybersecurity measures to further protect against similar events moving forward. We are also notifying potentially impacted individuals, including you, so they may take steps to best protect their information, should they feel it is appropriate to do so.

**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. You can review the enclosed STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION to learn helpful tips on steps you can take to protect against possible information misuse, should you feel it appropriate to do so.

**For More Information.** We understand that you may have questions about this event that are not addressed in this letter. If you have additional questions, please call 1 (877) 550-7927 from 7:00 a.m. MT to 7:00 p.m. MT, Monday through Friday, excluding major U.S. holidays. You may also write to us at 460 West Universal Circle, Sandy, Utah 84070. We take this event very seriously and sincerely regret any inconvenience or concern this event may cause you.

Sincerely,

Café Zupas LC

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

### Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three (3) major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit <https://www.annualcreditreport.com> or call, toll-free, 1 (877) 322-8228. Consumers may also directly contact the three (3) 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 (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 (7) years. Should consumers wish to place a fraud alert, please contact any of the three (3) 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 (2) to five (5) 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 (3) major credit reporting bureaus listed below:

| <b>Equifax</b>                                                                                                                  | <b>Experian</b>                                                             | <b>TransUnion</b>                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| <a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a> | <a href="https://www.experian.com/help/">https://www.experian.com/help/</a> | <a href="https://www.transunion.com/data-breach-help/">https://www.transunion.com/data-breach-help/</a> |
| 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; <https://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, the Federal Trade Commission, 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>.

*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 [https://www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](https://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 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 <https://www.ncdoj.gov>.