

April 11, 2025

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**Via Online Portal**

**Attorney General Bob Ferguson**  
Office of the Attorney General  
1125 Washington Street SE  
P.O. Box 40100  
Olympia, WA 98504

**Re: Supplemental Notice of Data Breach Involving Landmark Admin, LLC**

Dear Attorney General Ferguson:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents Landmark Admin, LLC (“Landmark”), located at 5750 County Road 225, Brownwood, Texas 76801, with respect to a recent cybersecurity incident that was discovered by Landmark on or about May 13, 2024 and June 17, 2024 (hereinafter, the “Incident”). Please accept this as a supplement to Landmark’s prior notice submission.

Landmark is a third-party administrator for various insurance carriers. As such, Landmark received certain personal information regarding individuals who are, or at one time were, a policyowner, insured, beneficiary, payor and/or producer for insurance policies which Landmark administered or continues to administer.

Landmark takes the security and privacy of the information in its control very seriously and has taken steps to prevent a similar incident from occurring in the future. This letter will serve to provide an update involving the nature of the Incident, what information may have been compromised, the number of residents within your state that were notified, and the steps that Landmark has taken in response to the Incident.<sup>1</sup>

**1. Nature of the Incident**

On or about May 13, 2024, Landmark’s IT vendor detected suspicious activity on its system and, on May 15, 2024, discovered data had been exfiltrated.<sup>2</sup> Upon discovery of this Incident Landmark immediately disconnected the affected systems and remote access to the network and promptly engaged a specialized third-party cybersecurity firm and IT personnel to assist with securing the environment, remediation and recovery, live forensics, as well as to conduct a comprehensive forensic investigation to determine the

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<sup>1</sup> Landmark previously submitted a sample individual notice letter from the first wave of notices that were mailed on October 23, 2024 and October 24, 2024 which is substantively similar to the individual notice letter templates used in the subsequent waves of notice.

<sup>2</sup> On or about May 16, 2024, Landmark recovered all data that had been exfiltrated.  
55 West Monroe Street, Suite 3800 • Chicago, IL 60603 • p 312.704.0550 • f 312.704.1522

nature and scope of the incident. Landmark also notified the insurance carriers which it acted as a third-party administrator whose data was impacted.

On or about May 22, 2024, the third-party cybersecurity firm determined that the root cause and initial unauthorized access to Landmark’s system had occurred on May 13, 2024 *via* the VPN using valid credentials based on the available artifacts and live forensics. The forensic investigation was inconclusive as to how the credentials were compromised. The third-party cybersecurity firm also concluded the root cause and attack vector had been mitigated and no longer existed after Landmark changed the account passcodes and Landmark’s environment was safe and secure and free of any malicious activity. Accordingly, Landmark fully reinstated its network and remote access.

On June 17, 2024, Landmark discovered the threat actor had re-entered its environment and exfiltrated data.<sup>3</sup> The specialized third-party cybersecurity firm and IT personnel which was engaged by Landmark continued to assist with securing Landmark’s environment and its remediation and recovery efforts. Landmark notified all insurance carriers whose data was might have been impacted within the affected systems.

The forensic investigation concluded on or about July 24, 2024. The investigatoin determined unauthorized access to Landmark’s network occurred from May 13, 2024 to June 17, 2024, and certain systems were encrypted and data had been exfiltrated after the threat actor re-entered its systems. Although the investigation found data had been exfiltrated, it was unable to identify *which* specific files/folders were exfiltrated after the threat actor re-entered Lankmark’s systems. Since Landmark has a significant amount of data which contains *no* personally identifiable information, it is possible that the exfiltrated data did not contain any personally identifiable information. Landmark has no evidence that any of the exfiltrated data *actually* contained personally identifiable information.

Based on these findings, Landmark reviewed the affected systems to identify the individuals potentially affected by this incident and the types of information possibly compromised. In an abundance of caution, Landmark coordinated with each of the insurance carriers to notify the potentially affected individuals for whom it had valid addresses *via* U.S. first class mail on a rolling basis as the information became available. Landmark also posted substitute notice of this incident on its website and publishing media notice in the Houston Chronicle on June 12, 2024. On June 26, 2024, Landmark posted an updated substitute notice on its website and submitted a Media Release to PRNewswire for nationwide distribution.

Based on the investigation, the following information related to potentially impacted individuals may have been subject to unauthorized access: full name; address; Social Security number; tax identification number; drivers’ license number/government-issued identification card number; picture of drivers’ license number/government issued identification card; bank account and routing number; medical and/or health information; health insurance policy number; health claim, date of birth, life and annuity policy information, life insurance policy application, and insurance benefit payment amount and payees. The information varied among each potentially affected individual and only applies if the information was actually provided to Landmark.

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<sup>3</sup> The threat actor had built a backdoor on a third-party backup appliance within Landmark’s envirnoment which was designed with a Linux-based architecture that is hardened against cyber threats.

## 2. Impacted individuals

Landmark identified a total of Washington residents as potentially affected by this incident.<sup>4</sup> Landmark mailed individual notification letters to the potentially impacted individuals in waves as information became available on October 23, 2024, October 24, 2024, January 24, 2025, January 31, 2025, February 21, 2025, March 17, 2025, March 21, 2025, and April 10, 2025. Landmark previously submitted a sample individual notice letter from the first wave with its prior notice.

Landmark is providing notice on behalf of the insurance carriers (which Landmark acted as a third-party administrator) that were impacted by this Incident, as identified in **Exhibit A**.

## 3. Steps taken in response to the Incident

Data privacy and security are among Landmark’s highest priorities, and we are committed to doing everything we can to protect the privacy and security of the personal information in our care. Upon discovery of the incident, Landmark moved quickly and diligently to investigate, respond, and assess the security of its systems with the assistance of outside experts.

Landmark has also taken additional technical and administrative steps to further enhance the security of its systems and customer data to mitigate the risk of future harm. Specifically, Landmark acquired servers and deployed after server hardening, deployed a new firewall with the latest firmware, obtained new external IP address assigned by a new Internet Service Provider, implemented new domain controllers with new account naming conventions and forced new passwords, enabled BitLocker on all hard drives, reimaged all printers on the network, reimaged all network switches and updated to the latest firmware, and reimaged and updated all IoT devices with the latest firmware. Landmark also provided additional security training for all staff members, restricted all points of access to its systems, engaged a managed service provider to supplement the existing strong security posture with additional monitoring and protection software, and requires multifactor authentication for all devices (for both user and administrator logins). Landmark also notified law enforcement of this incident and this notice has not been delayed due to any law enforcement investigation.

In addition, after June 17, 2024, Landmark never reinstated access to the impacted system for its operations and, instead, build a new system that was totally disconnected from the prior system. The third-party cybersecurity firm set up surveillance and Landmark’s IT vendor monitored on the new system from its inception to ensure there was no malicious activity.

In response to this incident, Landmark offered credit monitoring and identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection services included a minimum of 12 months (or 24 months for residents of Connecticut, Washington D.C., and Massachusetts) of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services.

Landmark also provided additional guidance on how to better protect against identity theft and fraud, including providing information on how to place a fraud alert and security freeze on one’s credit file, the

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<sup>4</sup> This is the total number of potentially impacted individuals for all waves of notice.

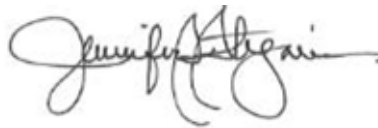
contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and the contact details for the Federal Trade Commission.

#### **4. Contact Information**

Landmark remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at [Jennifer.Stegmaier@wilsonelser.com](mailto:Jennifer.Stegmaier@wilsonelser.com) or 312-821-6167.

Very truly yours,

**Wilson Elser Moskowitz Edelman & Dicker LLP**



Jennifer S. Stegmaier

# **Exhibit A**

## **Landmark Providing Notice On Behalf of Insurance Carriers**

Landmark is submitting notice on its own behalf and on behalf of the insurance carriers which it acted as a third-party administrator, including:

- Liberty Bankers Insurance Group which includes American Monumental Life Insurance Company, Pellerin Life Insurance Company, American Benefit Life Insurance Company, Liberty Bankers Life Insurance Company, Continental Mutual Insurance Company, and Capital Life Insurance Company
- Accendo Insurance Company

<<Variable: Carrier Logo>>




Landmark Admin, LLC  
Return to IDX  
P.O. Box 989728  
West Sacramento, CA 95798-9728

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

Enrollment Code: <<ENROLLMENT>>  
To Enroll, Scan the QR Code Below:





Or Visit:  
<https://response.idx.us/landmark>

*Via First Class Mail*

January 24, 2025

**Re: Notice of Data Breach**

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

We are writing to inform you of a data security incident that may have involved your personal information. We take the protection of your personal information very seriously and are sending you this notice to tell you what happened, what information was involved, what we have done in response, what you can do in response to this incident, and what resources are available to help protect against the potential misuse of sensitive personal information.

Landmark Admin, LLC (“Landmark”), located at 5750 County Road 225, Brownwood, Texas 76801, is a third-party administrator for insurance carriers <<TPA Client>>. As such, Landmark received certain of your personal information because you are or at one time were a <<Recipient Relationship>> for <<Type of Insurance>> policy which Landmark administered, or continues to administer, for this carrier.

**What Happened**

On or about May 13, 2024, Landmark detected suspicious activity on its system. Upon discovery of this incident, Landmark immediately disconnected the affected systems and remote access to the network and promptly engaged a specialized third-party cybersecurity firm and IT personnel to assist with securing the environment, as well as to conduct a comprehensive forensic investigation to determine the nature and scope of the incident. The forensic investigation concluded on or about July 24, 2024, and determined that there was unauthorized access to Landmark’s network and data was encrypted and exfiltrated from its system. The unauthorized activity occurred from May 13, 2024 to June 17, 2024.

Based on these findings, Landmark began reviewing the affected systems to identify the individuals potentially affected by this incident and the types of information that may have been compromised. While this process remains ongoing, and in an abundance of caution, Landmark is notifying potentially affected individuals by mail on a rolling basis as they are identified. We determined that some of your personal information may have been affected by the incident.

**What Information Was Involved**

The personal information that may have been subject to unauthorized access includes: <<variable: exposed data elements>>. Please note the information impacted varies for each potentially impacted individual.

## **What We Are Doing**

Data privacy and security are among Landmark's highest priorities, and we are committed to doing everything we can to protect the privacy and security of the personal information in our care. Upon discovery of the incident, Landmark moved quickly and diligently to investigate, respond, and assess the security of its systems with the assistance of outside experts.

Landmark has also taken additional technical and administrative steps to further enhance the security of its systems and customer data to mitigate the risk of future harm. Specifically, Landmark acquired servers and deployed after server hardening, deployed a new firewall with the latest firmware, obtained new external IP address assigned by a new Internet Service Provider, implemented new domain controllers with new account naming conventions and forced new passwords, enabled BitLocker on all hard drives, reimaged all printers on the network, reimaged all network switches and updated to the latest firmware, and reimaged and updated all IoT devices with the latest firmware. Landmark also provided additional security training for all staff members, restricted all points of access to its systems, engaged a managed service provider to supplement the existing strong security posture with additional monitoring and protection software, and requires multifactor authentication for all devices (for both user and administrator logins). Landmark also notified law enforcement of this incident and this notice has not been delayed due to any law enforcement investigation.

In addition, we are offering identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection services include: <<12 months/24 months>> of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

## **What You Can Do**

We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling 1-866-273-9228, going to <https://response.idx.us/landmark>, or scanning the QR image and using the Enrollment Code provided above. IDX representatives are available Monday through Friday, during the hours of 9:00 a.m. and 9:00 p.m. Eastern Time (excluding U.S. national holidays). Please note the deadline to enroll is April 24, 2025.

We also recommend that you remain vigilant for the next 12 to 24 months and take steps to protect yourself against incidents of identity theft and fraud, including monitoring your accounts, and account statements and promptly reporting incidents of suspected identity theft to the relevant institution. We also recommend monitoring your free credit reports for suspicious or unauthorized activity. You have the right to obtain a police report. Additionally, security experts suggest that you contact your financial institution and all major credit bureaus to inform them of such a breach and then take recommended steps to protect your interests, including the possible placement of a free security freeze and fraud alert on your credit file. Please review the enclosed *Steps You Can Take to Help Protect Your Information* to learn more about how to place security freezes and fraud alerts on your credit file and how to further protect against the possibility of information misuse.

## **For More Information**

If you have any questions or concerns not addressed in this letter, you may contact IDX by calling 1-866-273-9228 (toll free) Monday through Friday, during the hours of 9:00 a.m. and 9:00 p.m. Eastern Time (excluding U.S. national holidays). You can also go to <https://response.idx.us/landmark> or scanning the QR image to access an informational website. These resources will be available to you for 90 days after the date of this letter.

Landmark sincerely regrets that this incident occurred and any inconvenience that it may cause and remains dedicated to ensuring the privacy and security of all information within our control.

Sincerely,



Thomas A. Munson, President  
Landmark Admin, LLC

## *STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION*

### **Monitor Your Accounts**

We recommend that you remain vigilant for incidents of fraud or identity theft by regularly reviewing your credit reports and financial accounts for any suspicious activity. You should contact the reporting agency using the phone number on the credit report if you find any inaccuracies with your information or if you do not recognize any of the account activity.

You may obtain a free copy of your credit report by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com), calling toll-free at 1-877-322-8228, or by mailing a completed Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report for a fee by contacting one or more of the three national credit reporting agencies.

You have rights under the federal Fair Credit Reporting Act (FCRA). The FCRA governs the collection and use of information about you that is reported by consumer reporting agencies. You can obtain additional information about your rights under the FCRA by visiting <https://www.ftc.gov/legal-library/browse/statutes/fair-credit-reporting-act>.

### **Credit Freeze**

You have the right to add, temporarily lift and remove a credit freeze, also known as a security freeze, on your credit report at no cost. A credit freeze prevents all third parties, such as credit lenders or other companies, whose use is not exempt under law, from accessing your credit file without your consent. If you have a freeze, you must remove or temporarily lift it to apply for credit. Spouses can request freezes for each other as long as they pass authentication. You can also request a freeze for someone if you have a valid Power of Attorney. If you are a parent/guardian/representative you can request a freeze for a minor 15 and younger. To add a security freeze on your credit report you must make a separate request to each of the three national consumer reporting agencies by phone, online, or by mail by following the instructions found at their websites (see “Contact Information” below). The following information must be included when requesting a security freeze: (i) full name, with middle initial and any suffixes; (ii) Social Security number; (iii) date of birth (month, day, and year); (iv) current address and any previous addresses for the past five (5) years; (v) proof of current address (such as a copy of a government-issued identification card, a recent utility or telephone bill, or bank or insurance statement); and (vi) other personal information as required by the applicable credit reporting agency.

### **Fraud Alert**

You have the right to add, extend, or remove a fraud alert on your credit file at no cost. A fraud alert is a statement that is added to your credit file that will notify potential credit grantors that you may be or have been a victim of identity theft. Before they extend credit, they should use reasonable procedures to verify your identity. Please note that, unlike a credit freeze, a fraud alert only notifies lenders to verify your identity before extending new credit, but it does not block access to your credit report. Fraud alerts are free to add and are valid for one year. Victims of identity theft can obtain an extended fraud alert for seven years. You can add a fraud alert by sending your request to any one of the three national reporting agencies by phone, online, or by mail by following the instructions found at their websites (see “Contact Information” below). The agency you contact will then contact the other credit agencies.

### **Federal Trade Commission**

For more information about credit freezes and fraud alerts and other steps you can take to protect yourself against identity theft, you can contact the Federal Trade Commission (FTC) at 600 Pennsylvania Avenue NW, Washington, DC 20580, [www.identitytheft.gov](http://www.identitytheft.gov), 1-877-ID-THEFT (1-877-438-4338), 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. You can obtain further information on how to file such a complaint by way of the contact information listed above.

You should also report instances of known or suspected identity theft to local law enforcement and the Attorney General’s office in your home state and you have the right to file a police report and obtain a copy of your police report.

## **Contact Information**

Below is the contact information for the three national credit reporting agencies (Experian, Equifax, and Transunion) if you would like to add a fraud alert or credit freeze to your credit report.

<b>Credit Reporting Agency</b>	<b>Access Your Credit Report</b>	<b>Add a Fraud Alert</b>	<b>Add a Security Freeze</b>
<b>Experian</b>	P.O. Box 2002 Allen, TX 75013-9701 1-866-200-6020 <a href="http://www.experian.com">www.experian.com</a>	P.O. Box 9554 Allen, TX 75013-9554 1-888-397-3742 <a href="https://www.experian.com/fraud/center.html">https://www.experian.com/fraud/center.html</a>	P.O. Box 9554 Allen, TX 75013-9554 1-888-397-3742 <a href="http://www.experian.com/freeze/center.html">www.experian.com/freeze/center.html</a>
<b>Equifax</b>	P.O. Box 740241 Atlanta, GA 30374-0241 1-866-349-5191 <a href="http://www.equifax.com">www.equifax.com</a>	P.O. Box 105069 Atlanta, GA 30348-5069 1-800-525-6285 <a href="http://www.equifax.com/personal/credit-report-services/credit-fraud-alerts">www.equifax.com/personal/credit-report-services/credit-fraud-alerts</a>	P.O. Box 105788 Atlanta, GA 30348-5788 1-888-298-0045 <a href="http://www.equifax.com/personal/credit-report-services">www.equifax.com/personal/credit-report-services</a>
<b>Transunion</b>	P.O. Box 1000 Chester, PA 19016-1000 1-800-888-4213 <a href="http://www.transunion.com">www.transunion.com</a>	P.O. Box 2000 Chester, PA 19016 1-800-680-7289 <a href="http://www.transunion.com/fraud-alerts">www.transunion.com/fraud-alerts</a>	P.O. Box 160 Woodlyn, PA 19094 1-800-916-8800 <a href="http://www.transunion.com/credit-freeze">www.transunion.com/credit-freeze</a>

**Iowa and Oregon residents** are advised to report suspected incidents of identity theft to local law enforcement, to their respective Attorney General, and the FTC.

**Massachusetts residents** are advised of their right to obtain a police report in connection with this incident.

**District of Columbia residents** are advised of their right to obtain a security freeze free of charge and can obtain information about steps to take to avoid identity theft by contacting the FTC (contact information provided above) and the Office of the Attorney General for the District of Columbia, Office of Consumer Protection, at 400 6<sup>th</sup> St. NW, Washington, D.C. 20001, by calling the Consumer Protection Hotline at (202) 442-9828, by visiting <https://oag.dc.gov>, or emailing at [consumer.protection@dc.gov](mailto:consumer.protection@dc.gov).

**Maryland residents** can obtain information about steps they can take to avoid identity theft by contacting the FTC (contact information provided above) or the Maryland Office of the Attorney General, Consumer Protection Division Office at 44 North Potomac Street, Suite 104, Hagerstown, MD 21740, by phone at 1-888-743-0023 or 410-528-8662, or by visiting <http://www.marylandattorneygeneral.gov/Pages/contactus.aspx>.

**New York residents** are advised that in response to this incident they can place a fraud alert or security freeze on their credit reports and may report any incidents of suspected identity theft to law enforcement, the FTC, the New York Attorney General, or local law enforcement. Additional information is available at the website of the New York Department of State Division of Consumer Protection at <https://dos.ny.gov/consumer-protection>; by visiting the New York Attorney General at <https://ag.ny.gov/> or by phone at 1-800-771-7755; or by contacting the FTC at [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/) or <https://www.identitytheft.gov/#/>.

**North Carolina residents** are advised to remain vigilant by reviewing account statements and monitoring free credit reports and may obtain information about preventing identity theft by contacting the FTC (contact information provided above) or the North Carolina Office of the Attorney General, Consumer Protection Division at 9001 Mail Service Center, Raleigh, NC 27699-9001, or visiting [www.ncdoj.gov](http://www.ncdoj.gov), or by phone at 1-877-5-NO-SCAM (1-877-566-7226) or (919) 716-6000.

**Rhode Island residents** are advised that they may file or obtain a police report in connection with this incident and place a security freeze on their credit file and that fees may be required to be paid to the consumer reporting agencies. It is estimated that there are approximately 8 Rhode Island residents affected by this incident.