



MULLEN
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July 30, 2021

VIA E-MAIL

Office of the Attorney General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
E-mail: securitybreach@atg.wa.gov

Re: Notice of Data Event

Dear Sir or Madam:

Our firm represents WSSC Water, a bi-county state agency and “unit” of the State of Maryland pursuant to State Government Article (“SG”) SG § 10-1301(f), formed and governed by Division II of the Public Utilities Article of the Maryland Annotated Code, located at 14501 Sweitzer Lane in Laurel, Maryland. WSSC Water operates exclusively within the State of Maryland, and delivers water and wastewater services to 1.8 million residents of Montgomery and Prince Georges County.

We write, as a courtesy, to inform you that WSSC Water is sending notification of a data incident to residents of your State, as more fully described below. By extending this courtesy, WSSC Water, as a “unit” of the State of Maryland, does not waive any rights or defenses regarding sovereign immunity, federalism, personal jurisdiction, or the applicability of Washington law. WSSC Water been in communication with the Maryland Attorney General’s Office, first providing written notice on June 15, 2021, and will be working with that Office regarding these issues going forward.

On or about May 24, 2021, WSSC Water discovered a ransomware virus beginning to infect their non-critical business systems, which was successfully halted and removed within hours. WSSC Water is fully operational, and the incident did not impact water or wastewater service or quality. The systems that operate WSSC Water’s filtration and wastewater treatment plants are, by design, stand-alone networks not connected to the Internet or other parts of the utility’s IT infrastructure. Existing cybersecurity safeguards and swift action taken by WSSC Water’s IT and Police and Homeland Security departments prevented the attack from causing serious harm.


While the investigation into this incident is ongoing, WSSC Water has determined that personal information of employees and retirees, as well as some of their dependents, likely was accessed or acquired by the criminal actor, and WSSC Water is proceeding to provide written notification to such individuals, together with five (5) years of credit monitoring and \$1,000,000 in identity theft insurance through Experian at no cost to them. WSSC Water is aware that Maryland law does not require this monitoring, and that the five (5) years being offered greatly exceeds any other state's requirement. The information that could have been subject to unauthorized access includes name, address, Social Security number, driver's license number, and direct deposit information. The investigation to identify all potentially impacted individuals is ongoing, but WSSC Water sent the first wave of letters to potentially impacted employees, retirees and dependents on July 26, 2021. Written notice will be provided to all potentially impacted individuals in substantially the same form as the letter attached here as ***Exhibit A***.

Additionally, WSSC Water is providing impacted individuals guidance on how to protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. WSSC Water is providing individuals with 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 and law enforcement to report attempted or actual identity theft and fraud.

While WSSC Water is providing this information as a courtesy, it is WSSC Water's position that, as a "unit" of the State of Maryland, Maryland law and the Maryland Attorney General have exclusive jurisdiction over this incident for purposes of any notification obligations, administrative reporting, investigation, or enforcement. WSSC Water does not intend to provide any additional information to your office going forward.

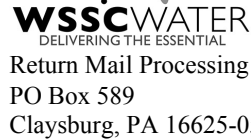
We thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "James Paulino".

James Paulino of
MULLEN COUGHLIN LLC

EXHIBIT A



Keith E. Bell, Chair

Fausto R. Bayonet

Chris Lawson

SAMPLE A. SAMPLE - L01 ADULT

123 ANY ST

[illegible]

Carla A. Reid

G6277-L01

What We Are Doing. As stated above, we are offering you and every potentially impacted individual five (5) years of credit and identity monitoring with \$1,000,000 in identity theft insurance at no cost to you. Upon learning of this incident, WSSC Water moved quickly to secure our systems and to conduct a comprehensive investigation, as well as to report this incident to the FBI and Maryland Attorney General. As part of our ongoing commitment to the privacy of personal information in our care, we are reviewing our policies, procedures, and processes related to storage of and access to personal information. This investigation and response include confirming the security of WSSC Water's systems, reviewing the contents of relevant data for sensitive information, and notifying impacted individuals associated with that sensitive information. We also will cooperate with any investigation by law enforcement.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and monitor your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the attached "Steps You Can Take to Protect Personal Information."

We encourage you to enroll to receive the five (5) years of complimentary credit monitoring and identity theft protection services being provided by WSSC Water. WSSC Water will cover the cost of this service; however, you will need to enroll yourself in this service as we are unable to do so on your behalf.

For More Information. We understand you may have questions that are not addressed in this letter. If you have additional questions, or need assistance, please call (855) 797-1270, Monday through Friday from 9 a.m. to 11 p.m. and Saturday and Sunday from 11 a.m. to 8 p.m., Eastern Time, excluding U.S. major holidays. You may also contact WSSC Water by mail at 14501 Sweitzer Ln, Laurel, MD 20707.

We sincerely regret any inconvenience this incident may have caused.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carla A. Reid', with a stylized flourish at the end.

CARLA A. REID
General Manager/CEO

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering a complimentary ENROLLLENGTH-month membership of Experian's® IdentityWorksSM. This product provides you with superior identity protection and resolution of identity theft, which will be extended for a total of five (5) years following your enrollment at no cost to you. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: October 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (855) 797-1270 by October 31, 2021. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR ENROLLLENGTH-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 agents 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.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (855) 797-1270. 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 (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 this Identity Restoration support is available to you for ENROLLLENGTH 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. You will also find self-help tips and information about identity protection at this site.

We sincerely apologize for this incident and regret any inconvenience it may cause you. Should you have questions or concerns regarding this matter, please do not hesitate to contact us at (855) 797-1270.



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 your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one 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 your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a credit freeze, you will need to provide 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 you are a victim of identity theft.

Should you wish to place a credit freeze, 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
888-298-0045	1-888-397-3742	833-395-6938
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

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your 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; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. WSSC Water is located at 14501 Sweitzer Ln, Laurel, MD 20707.

