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January 26, 2022

**VIA WEB PORTAL**

Attorney General Aaron Frey  
Office of the Attorney General  
Consumer Protection Division  
Security Breach Notification  
111 Sewall Street, 6th Floor  
Augusta, ME 04330

Re: **Notice of Data Security Incident**

Dear Attorney General Frey:

Lewis Brisbois Bisgaard & Smith LLP represents Morley Companies Inc. (“Morley”) in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with Maine’s data breach notification statute.

**1. Nature of the Incident**

Morley provides business processing and business administration services and is based in Saginaw, Michigan.

On August 1, 2021, Morley discovered unusual activity affecting Morley’s computers. Morley’s information technology personnel immediately launched an investigation to determine what happened. Morley also engaged cybersecurity experts to assist with the investigation. The investigation determined that Morley had experienced a data security incident and that an unknown actor may have gained access to and obtained data from the Morley network without authorization. Morley then worked to identify and review the information that was involved. On December 22, 2021, it was determined that some personal information may have been included in the information involved in the incident.

## 2. Type of Information and Number of Maine Residents Involved

The incident involved personal information for approximately 2 Maine residents. The information involved in the incident may include name, date of birth, Social Security number, Drivers License number, and Health Information.

The affected individuals will receive a letter notifying them of the incident and providing steps they can take to protect their personal information. The notification letters will be sent via USPS First Class Mail on January 26, 2022. A sample copy of the notification letter is enclosed with this letter. Our investigation into the incident is ongoing and we will provide additional notice to newly impacted individuals as they are identified.

## 3. Measures Taken to Address the Incident

Morley has taken steps outlined above in response to this incident and has made alterations to its cyber environment to help prevent similar incidents from occurring in the future. Morley has notified the FBI of this incident and are working with them in any resulting investigation. Additionally, we are providing impacted individuals with information about steps they can take to help protect their personal information. Morley is also offering credit monitoring and identity protection services at no cost through IDX, which will help individuals resolve issues if their identity is compromised due to this incident.

## 4. Contact Information

Morley remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact me at 215.977.4060 or [Richard.Goldberg@lewisbrisbois.com](mailto:Richard.Goldberg@lewisbrisbois.com).

Sincerely,



Richard W. Goldberg of  
LEWIS BRISBOIS BISGAARD &  
SMITH LLP

RWG:me  
Enclosure: Sample Consumer Notification Letter

**MORLEY**

Return to IDX:  
P.O. Box 989728  
West Sacramento, CA 95798-9728

To Enroll, Please Call:  
1-833-676-2226  
Or Visit:  
[https://app.idx.us/account-  
creation/protect](https://app.idx.us/account-creation/protect)  
Enrollment Code: <<Enrollment>>

<<FirstName>> <<LastName>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip>>

January 26, 2022

**Re:** <<Variable Text 1>>

Dear <<FirstName>> <<LastName>>,

We are writing to inform you of an incident that may have involved your personal information and to advise you of certain steps you can take to help protect your personal information, including the activation of credit and identity monitoring services we are offering at no cost to you.

**What Happened?** On December 22, 2021, we learned that your information may have been involved in a data security incident. The incident began on August 1, 2021, when our data became unavailable. We immediately engaged cybersecurity experts to determine if anyone's information had been affected and to help restore data access. While at this time we still have no evidence that any information was misused, out of an abundance of caution we are providing complimentary credit and identity monitoring to those whose information may have been in the affected systems.  
<<Variable Text 2>>

**What Information Was Involved?** The files that may have been accessed by the unauthorized individual may have contained Name, Date of Birth, Social Security number, Driver's License number, and Health Information.

**What Are We Doing?** As soon as we discovered the incident, we took the steps described above. In addition, we worked with our experts to try to prevent such an incident from ever happening again. We have also secured the services of IDX to provide credit and identity monitoring at no cost for <<Variable Text 4>> months. IDX is a global leader in risk mitigation and response, and its team has extensive experience helping people who have sustained an unintentional exposure of confidential data. The IDX services include: credit monitoring; identity monitoring; \$1 million in identity theft expense reimbursement insurance; fraud prevention and resolution support.

To receive credit services, you must be over the age of 18, have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file. Additional information describing your complimentary IDX services is included with this letter.

Please note you must enroll by April 26, 2022. If you have questions or need assistance, please call IDX at 1-833-676-2226.

**What You Can Do:** Please review the enclosed "Steps You Can Take to Further Protect Your Information" page. It describes additional steps you can take to help safeguard your information, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file. We also encourage you to activate the complimentary identity monitoring services we are making available through IDX.

**For More Information:** If you have questions or need assistance, please call 1-833-676-2226, Monday through Friday from 9 a.m. to 9 p.m. ET. Please have your Enrollment Code ready.

Protecting your information is important to us. Please know that we take this incident very seriously and deeply regret any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Gushow". The signature is written in a cursive style with a large initial "J" and a stylized "G".

Jill Gushow  
General Counsel  
Morley Companies, Inc.

## Steps You Can Take to Further Protect Your Information

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf> or <https://www.annualcreditreport.com/manualRequestForm.action>. You also can contact one of the following three national credit reporting agencies:

<b>TransUnion</b>	<b>Experian</b>	<b>Equifax</b>	<b>Free Annual Report</b>
P.O. Box 1000	P.O. Box 9532	P.O. Box 105851	P.O. Box 105281
Chester, PA19016	Allen, TX 75013	Atlanta, GA 30348	Atlanta, GA 30348
1-800-916-8800	1-888-397-3742	1-800-685-1111	1-877-322-8228
<a href="http://www.transunion.com">www.transunion.com</a>	<a href="http://www.experian.com">www.experian.com</a>	<a href="http://www.equifax.com">www.equifax.com</a>	<a href="http://www.annualcreditreport.com">www.annualcreditreport.com</a>

**Fraud Alert:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

**Security Freeze:** Under U.S. law, you have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Contact information for the FTC is: **Federal Trade Commission**, 600 Pennsylvania Ave, NW, Washington, DC 20580, [www.consumer.ftc.gov](http://www.consumer.ftc.gov) and [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), 1-877-438-4338. Residents of New York, Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

<b>New York Attorney General Bureau of Internet and Technology Resources</b>	<b>Maryland Attorney General</b>	<b>North Carolina Attorney General</b>	<b>Rhode Island Attorney General</b>
28 Liberty Street New York, NY 10005 <a href="mailto:ifraud@ag.ny.gov">ifraud@ag.ny.gov</a> 1-212-416-8433	200 St. Paul Place Baltimore, MD 21202 <a href="http://www.oag.state.md.us">www.oag.state.md.us</a> 1-888-743-0023	9001 Mail Service Center Raleigh, NC 27699 <a href="http://www.ncdoj.gov">www.ncdoj.gov</a> 1-877-566-7226	150 South Main Street Providence, RI 02903 <a href="http://www.riag.ri.gov">www.riag.ri.gov</a> 401-274-4400

**You also have certain rights under the Fair Credit Reporting Act (FCRA):** These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate,

incomplete, or unverifiable information, as well as others. For more information about the FCRA, and your rights pursuant to the FCRA, please visit [http://files.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf).