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June 30, 2022

**VIA WEBSITE 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: **Notification of Data Security Incident**

Dear Attorney General Frey:

Lewis Brisbois Bisgaard & Smith LLP represents Advocates, Inc. (“Advocates”) 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 data breach notification statute 10 Me. Rev. Stat. Ann. §§ 1346-1350B. This letter is being sent to supplement the notice provided by Advocates on January 3, 2022, because an additional seven (7) Maine residents were notified on June 28, 2022. In total, the personal information of 94 Maine residents may have been affected by this incident.

**1. Nature of the Security Incident**

Advocates is a Maine based non-profit organization that provides a broad range of services for people experiencing life challenges including addiction, aging, autism, brain injury, intellectual disabilities, mental health, and behavioral health in Maine.

On October 1, 2021, Advocates detected unusual activity in their digital environment. Upon discovering this activity, Advocates immediately took steps to secure its environment and engaged cybersecurity experts to assist with an investigation. The investigation determined that an unknown actor gained access to and obtained data from the Advocates network without authorization. The incident did not involve encryption, did not disrupt access to their network, and did not result in data loss.

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

Advocates provided two rounds of notification as the investigation progressed and Advocates identified additional potentially impacted individuals. For both rounds, the personal information impacted may have involved names, Social Security numbers, medical information, and health insurance information.

In Round 1, and in an abundance of caution, Advocates notified all past and present employees as well as service recipients with personal information (“PI”), including personal health information (“PHI”), stored on the Advocates network, where address information was available. Round 1 notification included 87 Maine residents.

Round 2 notification was based the results of a data mining project. Advocates determined that an additional seven (7) Maine residents were included in the Round 2 data set. For both rounds of notification, to comply with HIPAA, substitute notice was posted to the Advocates website. Additionally, in localities with more than 500 individuals involved, Advocates provided media notice in accordance with HIPAA.

## **3. Measures Taken to Address the Incident**

After discovering the incident, Advocates engaged industry-leading cybersecurity experts to investigate the incident. Advocates also implemented additional security features to reduce the risk of a similar incident occurring in the future. Additionally, Advocates has reported this incident to the Federal Bureau of Investigation and has assisted with the investigation.

On January 3, 2022, Advocates notified the 87 Maine residents about this event, and advised them about steps they can take to help protect their information. On June 28, 2022, Advocates notified an additional seven (7) Maine residents. In addition, Advocates offered all impacted Maine residents complimentary credit monitoring and identity protection services for 12 months through IDX. The identity monitoring services include Credit Monitoring, Web Watcher, Fraud Consultation, and Identity Theft Restoration.

## **4. Contact Information**

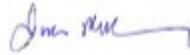
Advocates is dedicated to protecting the sensitive information within its control. If you have any

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questions or need additional information regarding this incident, please do not hesitate to contact me directly at 971-334-7001 or [Donna.Maddux@lewisbrisbois.com](mailto:Donna.Maddux@lewisbrisbois.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Donna Maddux", with a horizontal line extending to the right.

Donna Maddux of  
LEWIS BRISBOIS BISGAARD &  
SMITH LLP

DM/amn  
Enclosure:  
Adult Consumer Notification Letter

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

To Enroll, Please Call:  
(833) 365-2599  
Or Visit:  
<https://response.idx.us/advocates>  
Enrollment Code:  
<<XXXXXXXX>>

<<Date>>

**Re:** <<Variable2>>

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

Advocates Inc. (“Advocates”) is writing to inform you of a recent data security incident that may have involved your personal information. At Advocates, we take the privacy and security of all information within our possession very seriously. We want to notify you of the incident, provide you with steps you can take to help protect your personal information, and offer you complimentary credit monitoring and identity protection services.

**What Happened?** On October 1, 2021, Advocates discovered it was the victim of a sophisticated cybersecurity attack affecting the Advocates network. Upon discovering this activity, we took steps to secure our digital environment. We also engaged a leading cybersecurity firm to assist with an investigation to determine whether personal information may have been accessed or acquired without authorization in conjunction with the attack. The investigation revealed that an unknown actor gained access to and obtained certain data from the Advocates network. On June 9, 2022, we determined that some of your personal information may have been involved this incident. We have no reason to believe that your personal information has been misused as a result of this incident.

**What Information Was Involved?** The information potentially impacted is any information you provided to Advocates and may include your name, Social Security Number, medical information, health insurance information, and other information.

**What Are We Doing?** As soon as we discovered this incident, we took the steps referenced above. We also implemented additional security features to reduce the risk of a similar incident occurring in the future. We also notified the Federal Bureau of Investigation and will provide whatever cooperation is necessary to hold the perpetrators accountable, if possible. We are further notifying you of this event and advising you about steps you can take to help protect your information. In addition, out of an abundance of caution, we are offering you complimentary credit monitoring and identity protection services for <<12/24>> months through IDX, a national leader in identity theft protection.

IDX’s services include <<12/24>> months of credit monitoring, CyberScan dark web monitoring, a \$1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

**What You Can Do.** Please review this letter carefully, along with the guidance included with this letter about additional steps you can take to protect your information. You can also enroll in the IDX identity protection services, which are offered to you at no cost.

To receive credit monitoring services, you must be over the age of 18 and 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. You can enroll in the complimentary IDX identity protection services by calling <<number>> or going to <https://response.idx.us/advocates> and using the Enrollment Code provided above.

IDX representatives are available Monday through Friday from <<XX:XX>> am to <<XX:XX>> pm Eastern Time. Please note the deadline to enroll is <<enrollment deadline>>. Please do not discard this letter, as you will need the Enrollment Code provided above to access services.

**For More Information.** If you have any questions about this letter, please call <<number>> Monday through Friday from <<XX:XX>> am to <<XX:XX>> pm Eastern Time.

On behalf of Advocates, thank you for your understanding about this incident. Please accept our sincere apologies and know that we deeply regret any concern or inconvenience this matter may cause you.

Sincerely,

A handwritten signature in black ink that reads "Diane Gould". The signature is written in a cursive style with a large, stylized 'D' and 'G'.

Diane Gould  
President & CEO  
Advocates

## ADDITIONAL 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 monitoring free credit reports closely for errors and by taking other steps appropriate to protect accounts, including promptly changing passwords. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained for remediation assistance or contact a remediation service provider. 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). You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Ave, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.consumer.ftc.gov](http://www.consumer.ftc.gov), [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft).

**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 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>. You also can contact one of the following three national credit reporting agencies:

- *Equifax*, P.O. Box 740241, Atlanta, GA 30374, 1-800-525-6285, [www.equifax.com](http://www.equifax.com).
- *Experian*, P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, [www.experian.com](http://www.experian.com).
- *TransUnion*, P.O. Box 1000, Chester, PA 19016, 1-800-916-8800, [www.transunion.com](http://www.transunion.com).

**Fraud Alerts:** There are two kinds of general fraud alerts you can place on your credit report—an initial alert and an extended alert. You may want to consider placing either or both fraud alerts 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. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and provide the appropriate documentary proof. An extended fraud alert is also free and will stay on your credit report for seven years. 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>. Military members may also place an Active Duty Military Fraud Alert on their credit reports while deployed. An Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment

**Credit or Security Freezes:** Under U.S. law, you have the right to put a credit freeze, also known as a security freeze, on your credit file, for up to one year at no cost. The freeze 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. There is no fee to place or lift a security freeze. For information and instructions on how to place a security freeze, contact any of the credit reporting agencies or the Federal Trade Commission identified above. 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. After receiving your freeze request, each credit bureau will provide you with a unique PIN or password. Keep the PIN or password in a safe place as you will need it if you choose to lift the freeze.

A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or via phone, a credit bureau must lift the credit freeze within an hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after receiving your request.

**IRS Identity Protection PIN:** You can obtain an identity protection PIN (IP PIN) from the IRS that prevents someone else from filing a tax return using your Social Security number. The IP PIN is known only to you and the IRS and helps the IRS verify your identity when you file your electronic or paper tax return. You can learn more and obtain your IP PIN here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

**You also have certain rights under the Fair Credit Reporting Act (FCRA):** These rights include the right 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. 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).

**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.

#### **Additional information:**

**District of Columbia:** The Office of the Attorney General for the District of Columbia can be reached at 400 6th Street, NW, Washington, DC 2000; (202) 727-3400; [oag@dc.gov](mailto:oag@dc.gov) .gov

**Maine:** Maine Attorney General can be reached at: 6 State House Station Augusta, ME 04333; 207-626-8800; <https://www.maine.gov/ag/>.

**Maryland:** Maryland Attorney General can be reached at: 200 St. Paul Place Baltimore, MD 21202; 1-888-743-0023; [oag@state.md.us](mailto:oag@state.md.us) or [IDTheft@oag.state.md.us](mailto:IDTheft@oag.state.md.us)

**North Carolina:** North Carolina Attorney General's Office, Consumer Protection Division, can be reached at: 9001 Mail Service Center Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; [www.ncdoj.gov](http://www.ncdoj.gov)

**New York:** New York Attorney General can be reached at: Bureau of Internet and Technology Resources, 28 Liberty Street, New York, NY 10005, 1-212-416-8433, <https://ag.ny.gov/>.

**Rhode Island:** <<Variable 3>> Rhode Island Attorney General can be reached at: 150 South Main Street Providence, RI 02903, <http://www.riag.ri.gov>.

**Vermont:** Vermont Attorney General's Office can be reached at: 109 State Street, Montpelier, VT 05609; Phone (802) 828-3171; Email: [ago.info@vermont.gov](mailto:ago.info@vermont.gov).

**Washington D.C.:** Washington D.C. Attorney General can be reached at: 441 4th Street, NW Washington, DC 20001, 1-202-727-3400, [oag.dc.gov](http://oag.dc.gov).