



Richard W. Goldberg  
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February 1, 2022

File No. 49905.38

**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: Notification of Data Security Incident

Dear Attorney General Aaron Frey:

This letter is to provide an update regarding the recent data security incident experienced by Morley Companies, Inc. ("Morley") described in our previous correspondence dated January 26, 2022.

On February 1, 2022 Morley mailed notification letters to 60 individuals whose information may have been involved in this incident. The information varies depending on the individual, but may include Social Security numbers, name, date of birth, Driver's License number, and Health Information. The letter includes information notifying them of the incident, offering complimentary identity monitoring services, and providing additional steps they can take to protect their personal information. A copy of the sample notification letter is enclosed.

If you have any questions or need additional information, please do not hesitate to contact me at (215) 977-4060 or via email at [Richard.Goldberg@lewisbrisbois.com](mailto:Richard.Goldberg@lewisbrisbois.com).

Regards,

A handwritten signature in cursive script that reads 'Richard W. Goldberg'.

Richard W. Goldberg of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosures: Sample Consumer Notification E-Mail

**MORLEY**

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

Jill Gushow  
General Counsel  
One Morley Plaza, Saginaw, MI 48603  
morleycompanies.com

To enroll in credit/identity  
monitoring, please call:  
1-833-325-1783  
Or Visit:  
[www.idxmonitoring.com](http://www.idxmonitoring.com)  
Enrollment Code: <<Enrollment>>

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

February 1, 2022

**Re:** <<Subject Variable Text>>

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

We are writing to inform you of an incident that may have involved your personal information. You may not have heard of our company - Morley Companies, Inc. in Michigan - but we process information for health plans so that they can better serve you. We take the privacy and security of your information very seriously. Out of an abundance of caution we are providing identity theft protection to those whose information may have been in our data systems affected by the incident. Below is information about the incident and steps you can take to help protect your personal information, including activating the identity monitoring services we are offering at no cost to you.

**What Happened?** Morley Companies discovered it could not access certain files and folders on its systems. We immediately launched an investigation into the incident with the assistance of third-party computer forensic specialists to determine the nature and scope of the incident along with helping restore our systems. That investigation revealed that a ransomware-type malware had prevented access to some data files on our system beginning August 1, 2021 and there was unauthorized access to some files that contained personal information. We then worked diligently to prevent further access and identify impacted individuals. Special programming was required and unique processes had to be built in order to begin analyzing the data. The data complexity also required special processes to search for and identify key information. This process was lengthy but necessary to ensure appropriate notification occurred. On January 18, 2022, it was confirmed that your information was involved. Importantly, Morley Companies is not aware of any misuse of your personal information due to this incident.

**What Information Was Involved?** The files that may have been accessed by the unauthorized individual contained <<Variable1>><<Variable2>><<Variable3>>. Your Social Security number was included, but no financial information was involved.

**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 to you for 24 months. IDX is a global leader in risk mitigation and response, and its team has extensive experience helping people who have sustained an exposure of personal data. The IDX services include: credit monitoring; identity monitoring; \$1 million in identity theft expense reimbursement insurance; and 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 May 2, 2022. If you have questions or need assistance, please call IDX at 1-833-325-1783. Please see instructions in the top right corner of this letter.

**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 monitoring services we are making available through IDX.

**For More Information:** If you have questions or need assistance, please call IDX at 1-833-325-1783, Monday through Friday from 9 a.m. to 9 p.m. ET.

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 "G".

Jill Gushow  
General Counsel  
Morley Companies

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

<b>TransUnion</b> P.O. Box 1000 Chester, PA19016 1-800-916-8800 <a href="http://www.transunion.com">www.transunion.com</a>	<b>Experian</b> P.O. Box 9532 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com">www.experian.com</a>	<b>Equifax</b> P.O. Box 105851 Atlanta, GA 30348 1-800-685-1111 <a href="http://www.equifax.com">www.equifax.com</a>	<b>Free Annual Report</b> P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 <a href="http://www.annualcreditreport.com">www.annualcreditreport.com</a>
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**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> 28 Liberty Street New York, NY 10005 <a href="mailto:ifraud@ag.ny.gov">ifraud@ag.ny.gov</a> 1-212-416-8433	<b>Maryland Attorney General</b> 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	<b>North Carolina Attorney General</b> 9001 Mail Service Center Raleigh, NC 27699 <a href="http://www.ncdoj.gov">www.ncdoj.gov</a> 1-877-566-7226	<b>Rhode Island Attorney General</b> 150 South Main Street Providence, RI 02903 <a href="http://www.riag.ri.gov">www.riag.ri.gov</a> 401-274-4400
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**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).