WILSON ELSER
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

July 1, 2024

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Via Portal

Attorney General Aaron Frey
Office of the Attorney General
6 State House Station
Augusta, ME 04333

Re: Cybersecurity Incident

Dear Attorney General Frey:

Wilson Elser Moskowitz Edelman and Dicker LLP ("Wilson Elser") represents Florida Community Health Centers ("FCHC"), a healthcare provider headquartered in West Palm Beach, Florida, with respect to a recent cybersecurity incident that was first discovered by FHC on June 13, 2023 (hereinafter, the "Incident"). FCHC 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 inform you of the nature of the Incident, what information may have been compromised, the number of Maine residents being notified, and the steps that FCHC has taken in response to the Incident. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring services.

1. Nature of the Incident

On or around June 13, 2023, FCHC noticed suspicious activity in its network. In response, FCHC immediately engaged cybersecurity experts to conduct a thorough investigation to determine the nature and scope of the suspicious activity. Due to the sparsity of the available evidence for review, FCHC was unable to confirm whether an unauthorized user was able to access or obtain any personal information pertaining to its patients or employees. While the initial investigation concluded on September 7, 2023, additional time was required for the forensic analysis to determine the likelihood as to whether an unauthorized user bypassed certain access controls that were in place at the time of the incident to secure data within FCHC's network. On October 12, 2023, the investigation concluded that it was possible that an unauthorized user bypassed the access controls and accessed information within FCHC's computer systems.

Based upon the results of the forensic investigation and forensic analysis, FCHC conducted an internal review of the impacted data to determine what patient and/or employee sensitive information may have been accessed by the unauthorized for purposes of providing notice of the incident to the affected individuals. In the meantime, on November 20, 2023, FCHC posted a notice of the incident on the homepage of its website.

On January 8, 2024, FCHC completed its internal review. Subsequently, FCHC engaged a third-party data mining vendor to further assist with reviewing the sensitive personal information. On April 10, 2024, the data mining review was completed. Based on the results of the data mining review, FCHC will be notifying the affected patients via postal mail with an offer for complimentary credit monitoring and identity theft protection services as well as information on how individuals can further protect their information.

As of this writing, FCHC has not received any reports of related identity theft since the date of the incident (June 13, 2023 to present).

2. Number of Maine residents affected.

Based on the results of the forensic investigation and data review, FCHC determined that information pertaining to 63 Maine residents was impacted as a result of the Incident.
Notification letters to these individuals were mailed on July 1, 2024, by U.S. First Class Mail. A sample copy of the notification letter is attached hereto as **Exhibit A**.

3. Steps taken in response to the Incident.

FCHC is committed to ensuring the security and privacy of all personal information within its control and has taken steps to prevent a similar incident from occurring in the future. Since the discovery of the Incident, FCHC moved quickly to investigate, respond, and confirm the security of its systems by immediately shutting down its network, implementing necessary patches, and engaging a specialized incident response vendor to secure its network and conduct a forensic investigation. In addition, FCHC implemented security enhancement measures to prevent a similar incident from occurring in the future, such as strengthening password requirements, implementing new technical and physical safeguards to secure the data within its possession, and providing additional cybersecurity training for its employees.

While FCHC is not aware of any actual or attempted misuse of the affected personal information, FCHC is offering twelve (12) months of complimentary credit monitoring and identity theft restoration services through Cyberscout, a TransUnion company, to all individuals to help protect their identity. Additionally, FCHC provided 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 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

FCHC 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 Anjali.Das@WilsonElser.com or 312-821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Anjali C. Das

EXHIBIT A

Florida Community Health Centers
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998

Via First-Class Mail

P
[redacted]

Florida Community Health Centers, Inc.
Primary & Specialty Care Since 1976
"Before Birth & Beyond, Let Our Family Take Care of Yours"

June 17, 2024

Re: Data Security Incident

Dear [redacted],

Florida Community Health Centers ("FCHC") is writing to inform you of a recent data security incident that may have resulted in an unauthorized access of your sensitive personal information. While we are unaware of any fraudulent misuse of your personal information at this time, we are providing you with details about the incident, steps we are taking in response, and resources available to help you protect against the potential misuse of your information.

What Happened?

On June 13, 2023, FCHC was made aware that its computer network had been impacted by a ransomware incident, which may have resulted in the inadvertent exposure of health information of current and former FCHC patients (the "Incident"). Upon discovery of the Incident, FCHC engaged a specialized third-party vendor to secure its environment and conduct a forensic investigation to determine the root cause of the Incident, the extent of the unauthorized access, and determine whether patient information was potentially accessed without authorization. On October 12, 2023, the forensic investigation concluded there was evidence indicating that patient health information may have been accessed during the Incident by an unauthorized user.

Based on the results of the forensic investigation, FCHC conducted an internal review of its systems to determine what patient information may have been impacted as a result of the incident. After completing its internal review, on January 8, 2024, FCHC engaged a third-party data mining vendor to conduct a review of the impacted information in order to determine which patients' information may have been impacted as a result of the Incident. The third-party review was completed on April 11, 2024. Based on the results of the data mining review, FCHC is notifying the patients who may have been affected by the Incident via postal mail with an offer for complimentary credit monitoring and identity theft protection services as well as information on how individuals can further protect their information.

What Information Was Involved?

Although FCHC is unaware of any fraudulent misuse of information, it is possible that individuals' f[redacted], may have been exposed as a result of this unauthorized activity.

As of this writing, FCHC has not received any reports of related identity theft since the date of the incident.

What We Are Doing

FCHC is committed to ensuring the security and privacy of all personal information within its control, and is taking steps to prevent a similar incident from occurring in the future. Upon discovery of the Incident, FCHC moved quickly to investigate and respond to the Incident, assessed the security of its systems, and notified the potentially affected individuals. Specifically, FCHC engaged a specialized cybersecurity firm to conduct a forensic investigation to determine the nature and scope of the Incident and assist in efforts to remediate. FCHC promptly took steps to contain and remediate its impact, including employing appropriate protective and corrective measures to protect the integrity of its systems infrastructure and data. FCHC's information technology (IT) team worked to contain the situation and to isolate and rebuild affected machines. Various security tools were updated and new automated protections were built to prevent a similar incident from occurring. Additionally, FCHC, enhanced the security measures, and took steps and will continue to take steps to mitigate the risk of future harm.

In response to the incident, FCHC is providing you with access to Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services at no charge. These services provide you with alerts for 12 months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, FCHC is providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout, a TransUnion company specializing in fraud assistance and remediation services.

What You Can Do

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious or unauthorized activity. 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 whatever steps are recommended to protect your interests, including the possible placement of a 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 protect against the possibility of information misuse.

To enroll in Credit Monitoring services at no charge, please log on to [redacted] and follow the instructions provided. When prompted please provide the following unique code to receive services: [redacted]. In order for you to receive the monitoring services described above, you must enroll within ninety (90) days from the date of this letter. Enrolment requires an internet connection and e-mail account and may not be available to minors under the age of eighteen (18) years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

We would like to reiterate that, at this time, there is no evidence that your information was misused. However, we encourage you to take full advantage of the services offered.

For More Information

If you have any questions or concerns not addressed in this letter, please call [redacted] (toll free) Monday through Friday, during the hours of 8:00 a.m. and 8:00 p.m. Eastern Standard Time (excluding U.S. national holidays).

FCHC sincerely regrets any concern or inconvenience this matter may cause, and remains dedicated to ensuring the privacy and security of all information in our control.

Sincerely,

Florida Community Health Centers

Steps You Can Take to Help Protect Your Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at https://www.consumer.ftc.gov/articles/0155-free-credit-reports) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone or online. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years.

Experian	**TransUnion**	**Equifax**
P.O. Box 9554	P.O. Box 2000	P.O. Box 105069
Allen, TX 75013	Chester, PA 19016	Atlanta, GA 30348
1-888-397-3742	1-800-680-7289	1-800-525-6285
www.experian.com/fraud/center.html	www.transunion.com/fraud-alerts	https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/

Monitoring: You should always remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and by monitoring your credit report for suspicious or unusual activity.

Security Freeze: You have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Experian	**TransUnion**	**Equifax**
P.O. Box 9554	P.O. Box 160	P.O. Box 105788
Allen, TX 75013	Woodlyn, PA 19094	Atlanta, GA 30348-5788
1-888-397-3742	1-888-909-8872	1-888-298-0045
www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	https://www.equifax.com/personal/credit-report-services/credit-freeze/

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, 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. Instances of known or suspected identity theft should also be reported to law enforcement.

For residents of *Iowa*: State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of *Massachusetts*: It is required by state law that you are informed of your right to obtain a police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For residents of *New Mexico*: State law advises you to review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act at www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For residents of *Oregon*: State law advises you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of *Rhode Island*: It is required by state law that you are informed of your right to file or obtain a police report in regard to this incident.

For residents of *Arizona, Colorado, District of Columbia, Illinois, Maryland, New York, North Carolina,* and *Rhode Island:* You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Federal Trade Commission - Consumer Response Center: 600 Pennsylvania Ave, NW, Washington, DC 20580; 1-877-IDTHEFT (438-4338); www.identitytheft.gov

Arizona Office of the Attorney General Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004 1-602-542-5025

Colorado Office of the Attorney General Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000 www.coag.gov

District of Columbia Office of the Attorney General - Office of Consumer Protection: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; www.oag.dc.gov

Illinois office of the Attorney General - 100 West Randolph Street**,** Chicago, IL 60601**;** 1-866-999-5630**;** www.illinoisattorneygeneral.gov

Maryland Office of the Attorney General - Consumer Protection Division**:** 200 St. Paul Place**,** 16th floor, Baltimore, MD 21202; 1-888-743-0023; www.oag.state.md.us

New York Office of Attorney General - Consumer Frauds & Protection: The Capitol, Albany, NY 12224; 1-800-771-7755; https://ag.ny.gov/consumer-frauds/identity-theft

North Carolina Office of the Attorney General - Consumer Protection Division**:** 9001 Mail Service Center, Raleigh, NC 27699**;** 1-877-566-7226; www.ncdoj.com

Rhode Island Office of the Attorney General - Consumer Protection: 150 South Main St., Providence RI 02903**;** 1-401-274-4400**;** www.riag.ri.gov