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May 6, 2025

Via Online Portal

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

Re: Data Incident

Dear Attorney General Frey:

Wilson Elser Moskowitz Edelman and Dicker LLP ("Wilson Elser") represents Starkville Utilities ("Starkville"), a public utility service located at 200 North Lafayette Street, Starkville, Mississippi 39759, with respect to a recent data incident that was first discovered by Starkville on October 23, 2024 (hereinafter, the "Incident"). Starkville takes the security and privacy of the information within 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 impacted, the number of Maine residents being notified, and the steps that Starkville has taken in response to the Incident. We have also enclosed hereto a sample of the notification made to the potentially affected individuals, which includes an offer of complimentary credit monitoring services.

1. Nature of the Incident

On October 23, 2024, Starkville discovered unauthorized activity within its computer network (the "Incident"). Upon discovery of the Incident, Starkville immediately disconnected all access to the network and promptly engaged a specialized third-party incident response firm to assist with securing the environment, as well as, to conduct a comprehensive forensic investigation to determine the nature and scope of the incident. The forensic investigation, which concluded on

December 11, 2024, determined that an unauthorized user gained limited access to information within Starkville's computer network.

Based on these findings, Starkville engaged a third-party data mining vendor to perform a review of the information to identify the specific individuals and the types of information that may have been affected by the Incident. On April 7, 2025, Starkville finalized the list of individuals to notify. Although Starkville is unaware of any fraudulent misuse of information, it is possible that individuals' full name and Social Security numbers may have been exposed as a result of this unauthorized activity.

As of this writing, Starkville has not received any reports of related identity theft since the date of the incident (October 23, 2024, to present).

2. Number of Maine residents affected.

Based on its investigation, Starkville identified and notified three (3) residents of Maine whose information was impacted as a result of the Incident. Notification letters to these individuals were mailed on May 6, 2025, 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.

Starkville is committed to ensuring the security and privacy of all personal information in its control and has taken and will continue to take steps to prevent a similar incident from occurring in the future. Upon discovery of the Incident, Starkville moved quickly to investigate and respond to the Incident, assessed the security of its systems, and notified the potentially affected individuals. Additionally, Starkville implemented the following data security measures to prevent a similar incident from occurring in the future: deployed endpoint detection and response software for network security; engaged third-party firm specializing in EDR to provide 24/7 monitoring and response services; changed domain usernames and passwords for all network accounts; conducted password reset for all e-mail accounts; implemented multi-factor authentication on remote access systems; and implemented new email security software.

Although Starkville is not aware of any actual or attempted misuse of the affected personal information, Starkville offered twelve (12) months of complimentary credit monitoring and identity theft restoration services through HaystackID to the affected Maine residents to help protect their identity. Additionally, Starkville 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

Starkville 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 joseph.fusz@wilsonelser.com or 312-821-6141.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Joseph M. Fusz

EXHIBIT A

c/o Return Processing Center P.O. Box 3826 Suwanee, GA 30024

VIA FIRST-CLASS MAIL





April 25, 2025

Notice of Data Incident



Starkville Utilities ("Starkville") is writing to inform you of a recent data incident that may have resulted in unauthorized access to your 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 to the Incident, and resources available to help you protect against the potential misuse of your information.

What Happened?

On October 23, 2024, Starkville discovered unauthorized activity within its computer network (the "Incident"). Upon discovery of the Incident, Starkville immediately disconnected all access to the network and promptly engaged a specialized third-party cybersecurity firm to assist with securing the environment, as well as, to conduct a comprehensive forensic investigation to determine the nature and scope of the incident. The forensic investigation, which concluded on December 11, 2024, determined that an unauthorized user gained limited access to information within Starkville's computer network.

Based on these findings, Starkville engaged a third-party vendor to perform a data mining review of the information that was potentially accessed by the unauthorized user during the period of unauthorized activity to identify the specific individuals and the types of information that may have been affected by the Incident. On April 7, 2025, Starkville finalized the list of individuals to notify.

What Information Was Involved?

Based on the investigation, the following information related to you may have been subject to unauthorized access: name; address; Social Security Number.

Please note Starkville has not received evidence to date that any personal information has been misused by third parties as a result of this incident.

What We Are Doing

Data privacy and security are among Starkville's highest priorities, and we are committed to doing everything we can to protect the privacy and security of personal information within our care. Since discovery of the incident, Starkville moved quickly to investigate, respond, and confirm the security of its systems. Specifically, Starkville disconnected all access to its network, changed administrative credentials, restored operations in a safe and secure mode, enhanced its data security measures, and took steps and will continue to take steps to mitigate the risk of future harm.

In light of the incident, we are 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 24 months from the date of enrollment when changes occur to your credit file. This notification is sent to you on the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event that you become a victim of fraud. These services will be provided by HaystackID, a company specializing in fraud assistance and remediation services.

What You Can Do

To enroll in Credit Monitoring services at no charge, please log on to www.privacysolutions.com and follow the instructions provided. When prompted please provide the following unique code to receive services:

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 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 *ADDITIONAL RESOURCES TO HELP PROTECT YOUR INFORMATION*, to learn more about how to protect against the possibility of information misuse.

We would like to reiterate, 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 (toll free) during the hours of 9:00 am to 9:00 pm Eastern time, Monday through Friday (excluding U.S. national holidays).

Starkville 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,

Starkville Utilities

ADDITIONAL RESOURCES TO HELP PROTECT YOUR INFORMATION

<u>Monitor Your Accounts</u> We recommend that you remain vigilant for incidents of fraud or identity theft by regularly reviewing your credit reports and financial accounts for any suspicious activity. You should contact the reporting agency using the phone number on the credit report if you find any inaccuracies with your information or if you do not recognize any of the account activity.

You may obtain a free copy of your credit report by visiting www.annualcreditreport.com, calling toll-free at 1-877-322-8228, or by mailing a completed Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report for a fee by contacting one or more of the three national credit reporting agencies.

You have rights under the federal Fair Credit Reporting Act (FCRA). The FCRA governs the collection and use of information about you that is reported by consumer reporting agencies. You can obtain additional information about your rights under the FCRA by visiting https://www.ftc.gov/legal-library/browse/statutes/fair-credit-reporting-act.

Credit Freeze You have the right to add, temporarily lift and remove a credit freeze, also known as a security freeze, on your credit report at no cost. A credit freeze prevents all third parties, such as credit lenders or other companies, whose use is not exempt under law, from accessing your credit file without your consent. If you have a freeze, you must remove or temporarily lift it to apply for credit. Spouses can request freezes for each other as long as they pass authentication. You can also request a freeze for someone if you have a valid Power of Attorney. If you are a parent/guardian/representative you can request a freeze for a minor 15 and younger. To add a security freeze on your credit report you must make a separate request to each of the three national consumer reporting agencies by phone, online, or by mail by following the instructions found at their websites (see "Contact Information" below). The following information must be included when requesting a security freeze: (i) full name, with middle initial and any suffixes; (ii) Social Security number; (iii) date of birth (month, day, and year); (iv) current address and any previous addresses for the past five (5) years; (v) proof of current address (such as a copy of a government-issued identification card, a recent utility or telephone bill, or bank or insurance statement); and (vi) other personal information as required by the applicable credit reporting agency.

<u>Fraud Alert</u> You have the right to add, extend, or remove a fraud alert on your credit file at no cost. A fraud alert is a statement that is added to your credit file that will notify potential credit grantors that you may be or have been a victim of identity theft. Before they extend credit, they should use reasonable procedures to verify your identity. Please note that, unlike a credit freeze, a fraud alert only notifies lenders to verify your identity before extending new credit, but it does not block access to your credit report. Fraud alerts are free to add and are valid for one year. Victims of identity theft can obtain an extended fraud alert for seven years. You can add a fraud alert by sending your request to any one of the three national reporting agencies by phone, online, or by mail by following the instructions found at their websites (see "Contact Information" below). The agency you contact will then contact the other credit agencies.

<u>Contact Information</u> Below is the contact information for the three national credit reporting agencies (Experian, Equifax, and TranUnion) if you would like to add a fraud alert or credit freeze to your credit report.

Credit Reporting	Access Your Credit Report	Add a Fraud Alert	Add a Security Freeze
Agency			
Experian	P.O. Box 2002	P.O. Box 9554	P.O. Box 9554
	Allen, TX 75013-9701	Allen, TX 75013-9554	Allen, TX 75013-9554
	1-866-200-6020	1-888-397-3742	1-888-397-3742
	www.experian.com	https://www.experian.com/fraud/center.	www.experian.com/freeze/center.html
		<u>html</u>	-
Equifax	P.O. Box 740241	P.O. Box 105069	P.O. Box 105788
	Atlanta, GA 30374-0241	Atlanta, GA 30348-5069	Atlanta, GA 30348-5788
	1-866-349-5191	1-800-525-6285	1-888-298-0045
	www.equifax.com	www.equifax.com/personal/credit-	www.equifax.com/personal/credit
	_	report-services/credit-fraud-alerts	report-services
TransUnion	P.O. Box 1000	P.O. Box 2000	P.O. Box 160
	Chester, PA 19016-1000	Chester, PA 19016	Woodlyn, PA 19094
	1-800-888-4213	1-800-680-7289	1-800-916-8800
	www.transunion.com	www.transunion.com/fraud-alerts	www.transunion.com/credit-freeze

<u>Federal Trade Commission</u> For more information about credit freezes and fraud alerts and other steps you can take to protect yourself against identity theft, you can contact the Federal Trade Commission (FTC) 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.

You should also report instances of known or suspected identity theft to local law enforcement and the Attorney General's office in your home state and you have the right to file a police report and obtain a copy of your police report.

Maryland residents can obtain information about steps they can take to avoid identity theft by contacting the FTC (contact information provided above) or the Maryland Office of the Attorney General, Consumer Protection Division Office at 44 North Potomac Street, Suite 104, Hagerstown, MD 21740, by phone at 1-888-743-0023 or 410-528-8662, or by visiting http://www.marylandattorneygeneral.gov/Pages/contactus.aspx.

New York residents are advised that in response to this incident they can place a fraud alert or security freeze on their credit reports and may report any incidents of suspected identity theft to law enforcement, the FTC, the New York Attorney General, or local law enforcement. Additional information is available at the website of the New York Department of State Division of Consumer Protection at https://dos.nysits.acsitefactory.com/consumerprotection; by visiting the New York Attorney General at https://ag/ny.gov or by phone at 1-800-771-7755; or by contacting the FTC at www.itc.gov/bcp/edu/microsites/idtheft/ or https://www.identitytheft.gov/#/.

North Carolina residents are advised to remain vigilant by reviewing account statements and monitoring free credit reports and may obtain information about preventing identity theft by contacting the FTC (contact information provided above) or the North Carolina Office of the Attorney General, Consumer Protection Division at 9001 Mail Service Center, Raleigh, NC 27699-9001, or visiting www.ncdoj.gov, or by phone at 1-877-5-NO-SCAM (1-877-566-7226) or (919) 716-6000.

Rhode Island residents are advised that they may file or obtain a police report in connection with this incident and place a security freeze on their credit file and that fees may be required to be paid to the consumer reporting agencies.

Iowa and Oregon residents are advised to report suspected incidents of identity theft to local law enforcement, to their respective Attorney General, and the FTC.

Massachusetts residents are advised of their right to obtain a police report in connection with this incident.

District of Columbia residents are advised of their right to obtain a security freeze free of charge and can obtain information about steps to take to avoid identity theft by contacting the FTC (contact information provided above) and the Office of the Attorney General for the District of Columbia, Office of Consumer Protection, at 400 6th St. NW, Washington, D.C. 20001, by calling the Consumer Protection Hotline at (202) 442-9828, by visiting https://oag.dc.gov, or emailing at consumer.protection@dc.gov.