



LEWIS BRISBOIS BISGAARD & SMITH LLP

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September 13, 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  
Email: [breach.security@maine.gov](mailto:breach.security@maine.gov)

**Re: Notification of Data Security Incident**

Dear Attorney General Frey:

Lewis Brisbois represents Cultural Experiences Abroad, LLC, (“CEA”), a study abroad services company located in Phoenix, Arizona, in conjunction 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 law.

**1. Nature of the Security Incident**

On May 18, 2022, CEA experienced a network disruption. Upon discovering this activity, CEA immediately took steps to secure its digital environment and engaged leading cybersecurity experts to conduct an investigation to determine what happened and whether personal information may have been accessed or acquired in conjunction with the incident. The investigation revealed that an unknown actor gained access to and obtained data from the CEA network without authorization in conjunction with a ransomware attack. CEA subsequently initiated a comprehensive review of the affected files through independent experts to determine whether they contained personal information belonging to individuals. After a thorough investigation, on August 15, 2022, CEA determined that certain personal information was involved in the incident and is working diligently to notify these consumers.

**2. Type of Information and Number of Maine Residents Affected**

The name, and Social Security number, of two (2) Maine residents were involved in this incident. CEA is notifying these two (2) residents of Maine of this data security incident via first class U.S. mail on September 13, 2022. A sample copy of the notification letter sent to these individuals is included with this correspondence.

### 3. Steps Taken Relating to the Incident

CEA reported this incident to the Federal Bureau of Investigation and will cooperate with investigative efforts in an attempt to hold the perpetrator(s) of this incident responsible, if possible. CEA has also implemented additional security features in an effort to prevent a similar incident from occurring in the future. Further, as referenced above and in the sample consumer notification letter, CEA has offered the individual whose information was involved 12 months of complimentary services through IDX, which includes credit monitoring, dark web monitoring, a \$1 million identity fraud loss reimbursement policy, and fully-managed identity theft recovery services.

### 4. Contact Information

CEA remains dedicated to protecting the personal information in its possession. If you have any questions or need additional information, please do not hesitate to contact me at (214) 722-7141 or by email at [Lindsay.Nickle@lewisbrisbois.com](mailto:Lindsay.Nickle@lewisbrisbois.com).

Regards,

*Lindsay Nickle*

Lindsay Nickle of  
LEWIS BRISBOIS BISGAARD &  
SMITH llp

LBN/mjc

Enc.: Sample Consumer Notification Letter



Return Mail to IDX  
 10300 SW Greenburg Rd. Suite 570  
 Portland, OR 97223

To Enroll, Please Call:  
 1-800-939-4170  
 Or Visit:  
<https://app.idx.us/account-creation/protect>  
 Enrollment Code: <<XXXXXXXX>>

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

September 13, 2022

**Re: Notice of Data Security Incident**

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

We are writing to inform you of a recent data security incident experienced by Cultural Experiences Abroad, LLC, (“CEA”), that may have involved your information. Please read carefully as this letter contains background information about the incident, the type of information involved, and steps you can take to protect your information.

**What Happened?** On May 18, 2022, CEA became aware of a possible data security incident event involving its technological environment. Following discovery, we engaged an independent cybersecurity firm to investigate the scope of potential access to the CEA. After a thorough review, on August 15, 2022, we determined that some of your personal information may have been accessed without authorization. To date, we have no evidence to suggest that any of your personal information may have been misused as a result of this incident.

**What Information Was Involved?** The information may have included your full name, and <<variable text>>.

**What Are We Doing?** As soon as we discovered the incident, we took the steps described above. As part of the response process, we implemented additional measures to reduce the risk of a similar incident occurring in the future. We are also providing you with information about steps you can take to help protect your information, and out of an abundance of caution, we are offering you identity theft protection services through IDX. These services include <<12/24 months>> of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

**What You Can Do.** We encourage you to contact IDX with any questions and to enroll in free identity protection services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. Representatives are available between 9:00 am to 9:00 pm Eastern Time from Monday to Friday. Please note that the deadline to enroll is December 13, 2022. In addition, you can review the resources provided on the following pages for additional steps to protect your personal information.

**For More Information.** If you have any questions about this letter, please call 1-800-939-4170 Monday through Friday from 9:00 am – 9:00 pm Eastern Time. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Again, at this time, there is no evidence that your information has been misused as a result of this incident. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your information. The security of your information is our top priority at CEA, and we are committed to safeguarding your data and privacy. Please accept our sincere apologies and know that we deeply regret any concern or inconvenience that this may cause you.

Sincerely,

*Keith Cline*

Keith Cline, Chief Executive Officer  
Cultural Experiences Abroad, LLC

## Steps You Can Take to Protect Your Personal 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 also can contact one of the following three national credit reporting agencies:

### **Equifax**

P.O. Box 105851  
Atlanta, GA 30348  
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 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 one year. 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:** 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.

### **Federal Trade Commission**

600 Pennsylvania Ave, NW  
Washington, DC 20580  
[consumer.ftc.gov](http://consumer.ftc.gov), and  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

### **Maryland Attorney General**

200 St. Paul Place  
Baltimore, MD 21202  
[oag.state.md.us](http://oag.state.md.us)  
1-888-743-0023

### **New York Attorney General**

Bureau of Internet and Technology  
Resources  
28 Liberty Street  
New York, NY 10005  
1-212-416-8433

### **North Carolina Attorney General**

9001 Mail Service Center  
Raleigh, NC 27699  
[ncdoj.gov](http://ncdoj.gov)  
1-877-566-7226

### **Rhode Island Attorney General**

150 South Main Street  
Providence, RI 02903  
<http://www.riag.ri.gov>  
1-401-274-4400

### **Washington D.C. Attorney General**

441 4th Street, NW  
Washington, DC 20001  
[oag.dc.gov](http://oag.dc.gov)  
1-202-727-3400

**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 other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit [https://files.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf).