

June 10, 2024

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**Via Online Portal:**

**Note: via online portal**

<https://appengine.egov.com/apps/me/maine/ag/reportingform>

**Attorney General Aaron Frey**  
Office of the Attorney General  
Attn: Security Breach Notification  
Department of Professional & Financial Regulation  
Bureau of Consumer Credit Protection  
35 State House Station  
Augusta, Maine 04333

**Re: Cybersecurity Incident Involving CRG Lynwood, LLC d/b/a Lynwood Manor**

Dear Attorney General Frey:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents CRG Lynwood, LLC d/b/a Lynwood Manor (“Lynwood”), a healthcare provider located in Adrian, Michigan with respect to a recent cybersecurity incident that was first discovered by Lynwood on July 12, 2021 (hereinafter, the “Incident”). Lynwood 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 New Hampshire residents being notified, and the steps that Lynwood 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**

By way of background, Excelerate Healthcare Services (“EHS”) provides administrative services to various senior assisted living institutions including, but not limited to, Lynwood. These services included backend operations, staffing, and network infrastructure. In July 2021, EHS experienced a cybersecurity incident that impacted part of its network. Initially, it did not appear that Lynwood data was impacted. However, in September 2022, Lynwood learned that certain of its patient information may have been impacted as a result of the incident. Lynwood proceeded with posting HIPAA substitute notice of the incident, which has currently been on Lynwood’s website since November 2022.

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Meanwhile, Lynwood engaged a third-party vendor to analyze the data. The data mining process took some time given the complexities of the types and formatting of the data analyzed, requiring multiple phases of automated and manual review. The third-party data mining process was completed on January 31, 2024. On February 1, 2024, Lynwood engaged a third-party notice vendor to assist with the mailings, call center, and provide identity theft protection services. Thereafter, Lynwood worked to verify the patient information and addresses for mailing.

**2. Number of Maine residents affected.**

A total of 1 Maine resident(s) may have been potentially affected by this incident. Notification letters to these individuals were mailed on June 7, 2024 by first class mail. A sample copy of the notification letter is included with this letter under **Exhibit A**.

**3. Steps taken in response to the Incident.**

Data security is one of our highest priorities. Upon detecting this incident, we moved quickly to initiate an investigation, which included retaining a leading forensic investigation firm who assisted in conducting an investigation and confirming the security of our network environment. We also deployed additional monitoring tools and will continue to enhance the security of our systems. We take the protection and proper use of personal information very seriously.

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

Lynwood 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](mailto:Anjali.Das@WilsonElser.com) or 312-821-6164.

Very truly yours,

**Wilson Elser Moskowitz Edelman & Dicker LLP**



Anjali C. Das

# **EXHIBIT A**