



MULLEN
COUGHLIN^{LLC}
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426 W. Lancaster Avenue, Suite 200
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June 21, 2022

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

Dear Sir or Madam:

We represent Pape-Dawson Engineers, Inc. ("Pape-Dawson"), located at 2000 NW Loop 410, San Antonio, TX 78213, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately three (3) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Pape-Dawson does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about February 21, 2022, Pape-Dawson became aware of suspicious activity on its servers. Pape-Dawson immediately took steps to secure its network, and with the assistance of third-party forensic specialists, deployed countermeasures to contain the event. Pape-Dawson further began an investigation to determine the nature and scope of the activity. On March 2, 2022, the investigation confirmed that the unauthorized actor potentially gained access to certain files within Pape-Dawson's system between February 21 and February 25, 2022. Given that certain information was accessed without authorization, Pape-Dawson then undertook a comprehensive review of the impacted data to understand the specific information potentially impacted. On April 28, 2022, this review was completed, and it was determined that certain information related to individuals was potentially accessed as a result of this event.

The information that could have been subject to unauthorized access includes name, Social Security number, username and password, and health insurance information.

Notice to Maryland Residents

On June 21, 2022, Pape-Dawson provided written notice of this incident to approximately three (3) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Pape-Dawson moved quickly to investigate and respond to the incident, assess the security of Pape-Dawson systems, and identify potentially affected individuals. Further, Pape-Dawson notified federal law enforcement regarding the event. Pape-Dawson is also working to implement additional safeguards and training to its employees. Pape-Dawson is providing access to credit monitoring services for twelve (12) months, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Pape-Dawson is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Pape-Dawson is providing individuals with 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 encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Pape-Dawson is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion. Pape-Dawson is aware that law enforcement is currently investigating the event in response to Pape-Dawson's notification regarding the event.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4554.

Very truly yours,

Matthew V. Toldero of
MULLEN COUGHLIN LLC

MVT/rmm
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

June 21, 2022

i0087-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 ADULT 1-YEAR
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



Re: [Extra1]

Dear Sample A. Sample:

As you are aware, Pape-Dawson Engineers, Inc. (“Pape-Dawson”) experienced a cybersecurity event earlier this year. The event may have affected the privacy of some of your personal information. This letter contains information about the event, our response, and steps you can take to help protect against the possible misuse of your information, should you feel it is appropriate to do so.

What Happened? On or about February 21, 2022, Pape-Dawson became aware of suspicious activity on its servers. We immediately took steps to secure our network, and with the assistance of forensic cybersecurity specialists, deployed countermeasures to contain the event. We began an investigation to determine the nature and scope of the activity. The investigation determined an unauthorized actor potentially gained access to certain systems and certain information within those systems between February 21 and February 25, 2022.

Upon completion of the investigation, we commenced a thorough review of the potentially impacted data to identify individuals with information potentially at risk. We recently completed this review on April 28, 2022, and although we have no indication of any misuse of personal information as a result of this incident, out of an abundance of caution, we are providing notice to individuals who may have been impacted.

What Information Was Involved? Our investigation determined that the information related to you that may have been impacted includes your name and [Extra2]. We have no evidence that any of your information was used for identity theft or fraud.

What We Are Doing. The confidentiality, privacy, and security of information in our care are among our highest priorities. Accordingly, we have engaged our cyber security firm to monitor for suspicious activity and provide recommendations to continue strengthening our security protocols. As a part of our ongoing commitment to the privacy and security, we are reviewing and enhancing existing data procedures and security policies and procedures and instituting additional security measures to better protect against future similar events. We also notified federal law enforcement and relevant regulatory authorities.

We are notifying you out of an abundance of caution and providing information and resources to assist you in helping protect your personal information, should you feel it appropriate to do so. As an added precaution, we are offering you access to credit monitoring and identity theft protection services for twelve (12) months through Experian at no cost to you. If you wish to activate these complimentary services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Personal Information*. We encourage you to enroll in these services as we are unable to act on your behalf to do so.

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What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing account statements and monitoring your credit reports for suspicious activity and to detect errors. You should report any such activity to law enforcement. You can also enroll to receive the complimentary credit monitoring services that we are offering to you. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*.

For More Information. We understand that you may have questions that are not addressed in this notice. If you have additional questions or concerns, please call our dedicated call center at (866) 904-6214, which is available from 8:00 a.m. to 10:00 p.m. Central Time Monday through Friday, and Saturday and Sunday 10:00 a.m. to 7:00 p.m. Central Time (excluding major U.S. holidays). You may also write to Pape-Dawson at 2000 NW Loop 410, San Antonio, TX 78213.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

Pape-Dawson Engineers, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for twelve (12) months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for twelve (12) months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary twelve (12) month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** September 30, 2022 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (866) 904-6214 by September 30, 2022. Be prepared to provide engagement number B054030 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR TWELVE (12) MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.



Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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 have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. Pape-Dawson Engineers, Inc. is located at 2000 NW Loop 410, San Antonio, TX 78213.

For New Mexico residents, 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 bureaus 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 violator. 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 by visiting 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 New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 0 Rhode Island residents impacted by this incident.



