CONSTANGY BROOKS, SMITH & PROPHETE LLP

Lauren Godfrey, Partner
Cybersecurity & Data Privacy Team
322 North Shore Drive, Building 1B
Suite 200
Pittsburgh, PA 15212
lgodfrey@constangy.com
Mobile: 973.462.9521

Emergency: BreachResponse@constangy.com
Hotline: 877-382-2724 (877-DTA-BRCH)

August 1, 2024

VIA ELECTRONIC MAIL

Attorney General Anthony G. Brown
Office of the Attorney General
St. Paul Plaza
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Telephone: 410-576-6491
Email: Idtheft@oag.state.md.us

Re: Dvorak, LLC - Notice of Data Event

Attorney General Anthony G. Brown:

We represent Dvorak, LLC ("Dvorak") located at 2700 N Point Blvd, Baltimore, Maryland 21222, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately three hundred sixty-nine (369) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Dvorak 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.

1. Nature of the Data Event

On May 20, 2024, Dvorak discovered that it had experienced an incident disrupting access to certain of its systems. In response, Dvorak took immediate steps to secure its systems and promptly launched an investigation. Dvorak engaged independent digital forensics and incident response experts to determine what happened and to identify any information that may have been accessed or acquired without authorization as a result. On June 27, 2024, Dvorak learned that your personal information may have been impacted in connection with the incident which is the reason for this notification. Dvorak has no evidence of the misuse or attempted misuse of any potentially impacted information.

The information that could have been subject to unauthorized access includes first and last name, as well as Social Security number, driver's license number, passport number, W2 data, health insurance enrollment and costs.

2. Notice to Maryland Residents

On or about August 1, 2024, Dvorak provided written notice of this incident to three hundred sixty-nine (369) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

3. Other Steps Taken and To Be Taken

Upon discovering the event, Dvorak moved quickly to investigate and respond to the incident, assess the security of Dvorak systems, and identify potentially affected individuals. Dvorak is also working to implement additional safeguards and training to its employees. Dvorak is providing access to credit monitoring services for 12 months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Dvorak is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Dvorak 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.

4. Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 973.462.9521.

Very truly yours,

Lauren D. Godfrey

Lauren D. Godfrey of
Constangy, Brooks, Smith & Prophete LLP

Encl.

Exhibit A

Dvorak LLC
P.O. Box 989728
West Sacramento, CA 95798-9728

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

Enrollment Code: <<XXXXXXXX>>

To Enroll, Scan the QR Code Below:

SCAN ME

Or Visit:
https://app.idx.us/account-creation/protect

August 1, 2024

Re: Notice of Data Security Incident

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

Dvorak is writing to inform you of a recent data security incident that may have affected your personal information. Dvorak takes the privacy and security of all personal information within its possession very seriously. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your personal information.

What Happened? On May 20, 2024, Dvorak discovered that it had experienced an incident disrupting access to certain of its systems. In response, Dvorak took immediate steps to secure its systems and promptly launched an investigation. Dvorak engaged independent digital forensics and incident response experts to determine what happened and to identify any information that may have been accessed or acquired without authorization as a result. On June 27, 2024, Dvorak learned that your personal information may have been impacted in connection with the incident which is the reason for this notification. Please note that Dvorak has no evidence of the misuse or attempted misuse of any potentially impacted information.

What Information Was Involved? The information potentially impacted in connection with this incident included your name as well as your <<Variable Text 1 >>.

What Are We Doing? As soon as Dvorak discovered this incident, Dvorak took the steps described above. In addition, Dvorak implemented measures to enhance the security of its digital environment to minimize the risk of a similar incident occurring in the future.

Although Dvorak has no evidence of the misuse of any potentially impacted information, Dvorak is offering identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection 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. The deadline to enroll in these services is November 1, 2024.

What You Can Do: You can follow the recommendations on the following page to help protect your personal information. Dvorak also encourages you to enroll in the complementary services being offered to you through IDX.

For More Information: Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call IDX at 1-800-939-4170 from 9:00 A.M. to 9:00 P.M. Eastern Time, Monday through Friday (excluding holidays). IDX call center representatives are fully versed on this incident and can answer any questions that you may have.

Please accept my sincere apologies and know that Dvorak takes this matter very seriously and deeply regrets any worry or inconvenience that this may cause you.

Sincerely,

Brandon Weaver
Vice President
Dvorak LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR 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).

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Ave, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.consumer.ftc.gov, www.ftc.gov/idtheft.

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	**Experian**	**TransUnion**
P.O. Box 105851	P.O. Box 9532	P.O. Box 1000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
1-800-525-6285	1-888-397-3742	1-800-916-8800
www.equifax.com	www.experian.com	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.

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://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf.

District of Columbia Residents: For more information you can contact the Office of the Attorney General, Office of Consumer Protection, 400 6th Street, NW Washington, DC 20001, 202-442-9828, consumer.protection@dc.gov. You can also visit the Office of Consumer Protection's website at https://oag.dc.gov/consumer-protection for more information.

Maryland Residents: You may wish to contact the Attorney General, Consumer Protection Division, for more information at 200 St. Paul Place, Baltimore, MD 21202, by telephone at 410-528-8662 or 888-743-0023, or by email at Consumer@oag.state.md.us. You can also visit the Consumer Protection Division website at https://www.marylandattorneygeneral.gov/Pages/CPD/default.aspx for more information.

Logo/ P/Kaufmann
<<Return Address>>
<<City>>, <<State>> <<Zip>>

<<Date>>

which
Enrollment Code:
To Enroll, Scan the QR Code Below:

SCAN ME

Or Visit:
https://app.idx.us/account-creation/protect

Notice of Data Breach

Dear,

P/Kaufmann Inc. ("P/Kaufmann") is writing to provide information regarding an event that involves certain information relating to your personal information. We are providing you with further information about the event, our response to it, and additional measures that may be taken to protect your personal information should you feel it is appropriate to do so. We take this event very seriously and remain committed to safeguarding your personal information within our care.

What Happened

On May 24, 2024, we became aware that certain computer systems in our environment were accessed by an unknown actor. We immediately launched an extensive investigation, aided by third party computer forensic specialists, to determine the nature and scope of the event and worked quickly to secure our systems and investigate what happened and whether this resulted in any unauthorized access to information by the unknown actor. On June 30, 2024, through our investigation, we determined that an unknown actor gained access to a limited number of our systems and certain files in those systems were accessed.

What Information Was Involved

In an abundance of caution, we performed a comprehensive review of the contents of the affected systems to determine what information could be contained in the impacted files and to whom the information related. The review, which was recently completed, determined that your personal information, which in some circumstances may have included your name, address and social security number, could have been compromised. However, to date, there is no evidence that your information has been misused.

What We Are Doing

We took steps to address this incident promptly after it was discovered, including conducting an internal investigation to understand what had taken place and how. We have also reviewed our internal data management and protocols and have implemented enhanced security measures to help prevent this type of incident from recurring.

In addition, we are offering identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection services include: 12 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