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HUNTON & WILLIAMS

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APR 26 2016
CIVIL ENFORCEMENT DIVISION

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FILE NO: 87196.000002

April 18, 2016

Via Certified Mail

Oregon Department of Justice
1162 Court Street NE
Salem, OR 97301-4096

To Whom It May Concern:

In accordance with Or. Rev. Stat. § 646A.604, I am writing on behalf of dōTERRA International, LLC ("dōTERRA") to notify you regarding the nature and circumstances of a recent data security incident.

A third-party vendor that provides dōTERRA with data hosting and software services recently informed dōTERRA that an intruder had accessed some of the vendor's systems. That intrusion appears to have resulted in the unauthorized acquisition in March 2016 of personal information of some of dōTERRA's Wellness Advocates (i.e., distributors) and customers, and may have included names, Social Security numbers (or other government-issued identification numbers), payment card information (including full and partial card numbers, security codes and expiration dates), dates of birth, postal and email addresses, telephone numbers, and usernames and passwords. dōTERRA is working closely with law enforcement authorities and leading security experts to address the issue.

There are approximately 26,349 Oregon residents affected by this incident. Attached for your reference is a copy of one of the template notices being sent beginning on April 18, 2016 to the affected individuals. dōTERRA has paid for and arranged to offer identity protection and credit monitoring services to affected individuals for two years.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

Lisa Sotto 646

Lisa J. Sotto

Enclosure

dōTERRA®

AllClear ID Processing Center
P.O. BOX 141578 • Austin, TX 78714

00001
ACD1234

00001
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

April 18, 2016

Dear John Sample,

As an integral part of our dōTERRA family, we understand how important data security is to you. We are writing to notify you today that a third-party vendor that provides dōTERRA with data hosting and software services recently informed us that an intruder had accessed some of the vendor's systems. That intrusion appears to have resulted in the unauthorized acquisition in March 2016 of personal information of some of our Wellness Advocates and customers, and may have included names, Social Security numbers (or other government-issued identification numbers), payment card information (including full or partial card numbers, security codes and expiration dates), dates of birth, postal and email addresses, telephone numbers, and usernames and passwords. dōTERRA is working closely with law enforcement authorities and leading security experts to address the issue.

We deeply regret that this incident could affect you and are alerting you about this issue so you can take steps to protect yourself. In today's world, we all need to remain vigilant by regularly reviewing account statements and monitoring free credit reports. Under U.S. law, all citizens are entitled to one free credit report annually from each of the three nationwide consumer reporting agencies. In addition, dōTERRA has paid for and is offering you identity protection and credit monitoring services for 24 months at no cost to you. We have attached a Reference Guide which provides additional details to help you protect your personal information. Lastly, in the coming weeks, you will be prompted to change your password when you access your dōTERRA account. For any other online account where you use the same or a similar password, we recommend that you also change that password.

We take our obligation to safeguard your personal information very seriously. Be assured that we at dōTERRA are taking extensive measures to protect your information and have engaged industry-leading security firms to assist us. dōTERRA also has been investing heavily for some time now to implement its own state-of-the-art systems to support growth and expansion and enhance security. These efforts continue to proceed on track. We look forward to sharing more information about these new systems in the coming year.

Above all, we at dōTERRA value the sense of trust we have strived so hard to develop with our many Wellness Advocates and customers. We will continue to review and strengthen our IT

systems and protocols in our ongoing effort to enhance security. If you have any questions or concerns regarding this issue, please call 1-855-904-5752, Monday through Saturday, 8:00am - 8:00pm CT.

We thank you for your continued support and, as always, for being a member of the dōTERRA family.

Sincerely,

David Stirling
Chief Executive Officer

Reference Guide

We encourage you to take the following steps:

Register for Identity Protection and Credit Monitoring Services. We have arranged with AllClear ID to offer you identity protection and credit monitoring services for 24 months at no cost to you.

AllClear SECURE: This service provides you with a dedicated investigator to help you recover possible financial losses and help restore your credit and identity in the event challenges occur. You are automatically eligible to use this service – there is no action required on your part to enroll other than placing a call. You may receive this fraud assistance service by calling 1-855-904-5752.

AllClear PRO: This service offers additional layers of protection, including credit monitoring and a $1 million identity theft insurance policy. To use the PRO service, you will need to provide certain information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-855-904-5752 using the following redemption code: Redemption Code.

Order Your Free Credit Report. To order your free credit report, visit www.annualcreditreport.com, call toll-free at 1-877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three consumer reporting agencies provide free annual credit reports only through the website, toll-free number or request form.

When you receive your credit report, review it carefully. Look for accounts you did not open. Look in the "inquiries" section for names of creditors from whom you haven't requested credit. Some companies bill under names other than their store or commercial names. The consumer reporting agency will be able to tell you when that is the case. Look in the "personal information" section for any inaccuracies in your information (such as home address and Social Security number). If you see anything you do not understand, call the consumer reporting agency at the telephone number on the report. Errors in this information may be a warning sign of possible identity theft. You should notify the consumer reporting agencies of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate consumer reporting agency by telephone and in writing. Consumer reporting agency staff will review your report with you. If the information can't be explained, then you will need to call the creditors involved. Information that can't be explained also should be reported to your local police or sheriff's office because it may signal criminal activity.

Report Incidents. If you detect any unauthorized transactions in a financial account, promptly notify your payment card company or financial institution. If you detect any incident of identity theft or fraud, promptly report the incident to law enforcement, the FTC and your state Attorney General. If you believe your identity has been stolen, the FTC recommends that you take these steps:

- Place an initial fraud alert.
- Order your credit reports.
- Create an FTC Identity Theft Affidavit by submitting a report about the theft at http://www.ftc.gov/complaint or by calling the FTC.
- File a police report about the identity theft and get a copy of the police report or the report number. Bring your FTC Identity Theft Affidavit with you when you file the police report.
- Your Identity Theft Report is your FTC Identity Theft Affidavit plus your police report. You may be able to use your Identity Theft Report to remove fraudulent information from your credit report, prevent companies from refurnishing fraudulent information to a consumer reporting agency, stop a company from collecting a debt that resulted from identity theft, place an extended seven-year fraud alert with consumer reporting agencies, and obtain information from companies about accounts the identity thief opened or misused.

You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft and how to repair identity theft:

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

Consider Placing a Fraud Alert on Your Credit File. To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect you against the possibility of an identity thief opening new credit accounts in your name. When a merchant checks the credit history of someone applying for credit, the merchant gets a notice that the applicant may be the victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the applicant. You can place a fraud alert on your credit report by calling any one of the toll-free numbers provided below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three consumer reporting agencies. For more information on fraud alerts, you also may contact the FTC as described above.

Equifax	Equifax Credit Information Services, Inc. P.O. Box 740241 Atlanta, GA 30374	1-800-525-6285	www.equifax.com
Experian	Experian Inc. P.O. Box 9554 Allen, TX 75013	1-888-397-3742	www.experian.com
TransUnion	TransUnion LLC P.O. Box 2000 Chester, PA 19022-2000	1-800-680-7289	www.transunion.com

Consider Placing a Security Freeze on Your Credit File. You may wish to place a "security freeze" (also known as a "credit freeze") on your credit file. A security freeze is designed to prevent potential creditors from accessing your credit file at the consumer reporting agencies without your consent. There may be fees for placing, lifting, and/or removing a security freeze, which generally range from $5-$20 per action. *Unlike a fraud alert, you must place a security freeze on your credit file at each consumer reporting agency individually.* For more information on security freezes, you may contact the three nationwide consumer reporting agencies or the FTC as described above. As the instructions for establishing a security freeze differ from state to state, please contact the three nationwide consumer reporting agencies to find out more information.

The consumer reporting agencies may require proper identification prior to honoring your request. For example, you may be asked to provide:

- Your full name with middle initial and generation (such as Jr., Sr., II, III)
- Your Social Security number
- Your date of birth
- Addresses where you have lived over the past five years
- A legible copy of a government-issued identification card (such as a state driver's license or military ID card)
- Proof of your current residential address (such as a current utility bill or account statement)

For Maryland Residents. You can obtain information from the Maryland Office of the Attorney General about steps you can take to avoid identity theft. You may contact the Maryland Attorney General at:

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
(888) 743-0023 (toll-free in Maryland)
(410) 576-6300
www.oag.state.md.us

For Massachusetts Residents. You have the right to obtain a police report and request a security freeze as described above. The consumer reporting agencies may charge you a fee of up to $5 to place a security freeze on your account, and may require that you provide certain personal information (such as your name, Social Security number, date of birth, and address) and proper identification (such as a copy of a government-issued ID card and a bill or statement) prior to honoring your request for a security freeze. There is no charge, however, to place, lift or remove a security freeze if you have been a victim of identity theft and you provide the consumer reporting agencies with a valid police report.

For North Carolina Residents. You can obtain information from the North Carolina Attorney General's Office about preventing identity theft. You can contact the North Carolina Attorney General at:

North Carolina Attorney General's Office
9001 Mail Service Center
Raleigh, NC 27699-9001
(877) 566-7226 (toll-free in North Carolina)
(919) 716-6400
www.ncdoj.gov

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