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March 24, 2025

VIA EMAIL

Attorney General Anthony G. Brown
Maryland Office of the Attorney General
200 St. Paul Place
Baltimore, MD 21202

Re: Notice of Data Security Event

To Whom It May Concern:

Fox Rothschild LLP ("Fox") represents Center for Integrative Gut Health ("CIGH") and Gut Love, affiliated companies based in Westport, Connecticut ("CIGH/Gut Love"), in connection with the data security event described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with Maryland's data breach notification statute.

1. Nature of the Security Event

On January 29, 2025, CIGH/Gut Love learned of a fraudulent email sent from a spoofed email account meant to appear that it originated from CIGH/Gut Love. Upon learning of the fraudulent email, CIGH/Gut Love immediately began an investigation with the assistance of outside privacy and data security counsel to determine the nature and scope of the incident. Through the investigation, CIGH/Gut Love discovered there was potential unauthorized access to one of its email accounts containing personal information on January 21, 2025.

A Pennsylvania Limited Liability Partnership



Attorney General Anthony G. Brown

March 24, 2025

Page 2

2. Number of Affected Maryland Residents & Information Involved

The incident involved the personal information for five (5) Maryland residents. The information involved in the incident for those affected may have included: name, date of birth, phone number, email address, and appointment date. It may also include information emailed to CIGH/Gut Love from individuals such as medical information, credit card and payment information, and driver's licenses or other identification documents.

3. Notification to Affected Individuals

On March 19, 2025, notification letters were sent to affected individuals. The notification letter provides resources and steps individuals can take to help protect their information. The notification letter also offers the opportunity to enroll in twelve (12) months of complimentary identity protection services through IDX, including credit monitoring, identity remediation services, and access to toll-free numbers, should individuals have questions about the incident or signing up for the services. A sample notification letter sent to impacted individuals is included with this correspondence.

4. Steps Taken Relating to the Incident

In response to the incident, CIGH/Gut Love retained outside counsel with data privacy expertise to assist with an investigation to determine the source and scope of the potential compromise. CIGH/Gut Love also implemented additional security measures to further harden their defenses in an effort to prevent a similar event from occurring in the future.

Finally, as noted above, CIGH/Gut Love is notifying affected individuals and providing them with steps they can take to protect their personal information. CIGH/Gut Love has also established a toll-free call center through IDX, a leader in identity protection services, to answer questions about signing up and using the complimentary services.

VIA EMAIL



Attorney General Anthony G. Brown

March 24, 2025

Page 3

5. Contact Information

CIGH/Gut Love remains dedicated to protecting the personal information in its control and continually works to identify ways to improve its data privacy and security responsibilities. If you have any questions or need additional information, please do not hesitate to contact Amir Goodarzi at 215-299-2020.

Sincerely,

/s/ Amir Goodarzi

Amir Goodarzi

AG

Sample Notification Letter

The Center for Integrative Gut Health

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:



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

March 17, 2025

Re: Notice of Data Security Event

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

The Center for Integrative Gut Health (“CIGH”) is writing to notify you of a data security event that may have affected your personal information. While we are unaware of any attempted or actual misuse of your personal information, we are providing you with information about the event, our response, and steps you may take to protect against any misuse of your personal information, should you feel it necessary to do so.

What Happened? On January 29, 2025, CIGH learned of a fraudulent email sent from a spoofed email account meant to appear that it originated from CIGH. Upon learning of the fraudulent email, CIGH immediately began an investigation with the assistance of outside privacy and data security counsel to determine the nature and scope of the incident. Through the investigation, CIGH discovered potential unauthorized access to one of its email accounts containing personal information.

What Information was Involved? The potentially affected information included your name, date of birth, phone number, email address, appointment date. It may also have included information emailed by you to CIGH such as medical information, credit card and payment information, and driver’s license or other identification documentation.

What We Are Doing. Protecting personal information in our care is one of our top priorities. Upon learning of this event, we promptly initiated an investigation to review and enhance our security systems. We engaged outside privacy and data security counsel, upgraded our email to enhance security, implemented multi-factor authentication for our system users, and performed an enterprise-wide review of our electronic systems. We are also providing our patients with additional information on how to protect themselves.

Additionally, CIGH is offering affected individuals <<Membership Offering Length>> of complimentary credit monitoring and identity restoration services through IDX. The deadline to enroll in these services is June 17, 2025. Please note, to enroll in the services you must visit the website or call and speak with an IDX representative.

What You Can Do. Please review the enclosed “Steps You Can Take to Help Protect Your Personal Information,” which provides information on what you can do to better safeguard against possible misuse of your personal information. We also encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your credit reports for suspicious activity. If you identify any suspicious activity on your accounts, please contact the institution the account is held with to speak with them directly about the activity.

For More Information. If you have additional questions or concerns that are not addressed in this notice, please call us at 1-800-939-4170. This line is available from 9:00 a.m. to 9:00 p.m. Eastern Standard Time, excluding major U.S. holidays.

We sincerely regret any inconvenience this event may cause you. We remain committed to ensuring the security of information in our care.

Sincerely,

A handwritten signature in black ink, reading "Elena Ivanina". The script is elegant and cursive, with the first letter of each name being capitalized and prominent.

Dr. Elena A. Ivanina
The Center for Integrative Gut Health

Steps You Can Take to Help Protect Your Personal Information

Enroll in Credit Monitoring: To enroll in <<Membership Offering Length>> of complimentary credit monitoring services through IDX, please call, toll-free, 1-800-939-4170 or visit <https://app.idx.us/account-creation/protect> and enter the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9:00 a.m. – 9:00 p.m. Eastern Standard Time. Please note the deadline to enroll is June 17, 2025.

Monitor your accounts: We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity or errors. Please report any suspicious activity on your account to the institution.

Check credit reports: Under United States law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report at:

Equifax®
P.O. Box 740241
Atlanta, GA 30374
1-800-685-1111
www.equifax.com

Experian
P.O. Box 9701
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion®
P.O. Box 1000
Chester, PA 19016
1-800-888-4213
www.transunion.com

Place a security freeze: You may place a security freeze on your credit reports, free of charge. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. You will need to place a security freeze separately with each of the three major credit bureaus if you wish to place a freeze on all your credit files. To request a security freeze, you will need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver's license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. To find out more on how to place a security freeze, contact the credit reporting agencies at:

Equifax	P.O. Box 105788 Atlanta, GA 30348	1-800-685-1111	equifax.com/personal/credit-report-services
Experian	P.O. Box 9554 Allen, TX 75013	1-888-397-3742	experian.com/freeze/center.html
TransUnion	P.O. Box 2000 Chester, PA 19016	1-888-909-8872	transunion.com/credit-freeze

Place a fraud alert: At no charge, you can also have the three major credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact the credit reporting agencies.

Equifax	P.O. Box 105788 Atlanta, GA 30348	1-888-766-0008	equifax.com/personal/credit-report-services
Experian	P.O. Box 9554 Allen, TX 75013	1-888-397-3742	experian.com/fraud/center.html
TransUnion	P.O. Box 2000 Chester, PA 19016	1-888-909-8872	transunion.com/fraud-victim-resource/place-fraud-alert

Review additional resources: You can further educate yourself regarding identity theft, security freezes, fraud alerts, and the steps you can take to protect yourself against identity theft and fraud by contacting the Federal Trade Commission or your state Attorney General, with some shown below. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should be promptly reported to law enforcement, the Federal Trade Commission, and your state Attorney General. You have the right to file a police report if you ever experience identity theft or fraud. This notification was not delayed by law enforcement.

Federal Trade Commission (FTC)

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov and ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
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
ag.ny.gov
1-212-416-8433

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

**Rhode Island Attorney
General**

150 South Main Street
Providence, RI 02903
riag.ri.gov
1-401-274-4400

Washington, D.C. Attorney General

441 4th Street, NW
Washington, DC 20001
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://www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf>.