

**STATE OF VERMONT
WASHINGTON COUNTY**

STATE OF VERMONT)	
)	
Plaintiff,)	
)	Washington Superior Court
-vs-)	Docket No. 167-3-10 whcv
)	
LIFELOCK, INC.,)	
a Delaware Corporation,)	
)	
Defendant)	

COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF

Plaintiff, State of Vermont, by Attorney General William H. Sorrell, brings this action against Defendant, LIFELOCK, INC., a Delaware corporation (hereinafter referred to as "Defendant"), and states as follows:

I. JURISDICTION AND VENUE

1. This action is brought for and on behalf of the State of Vermont, by Attorney General William H. Sorrell, pursuant to Vermont's Consumer Fraud Act, 9 V.S.A. §§ 2451 *et seq.*
2. Venue is proper pursuant to 9 V.S.A. § 2458(a), because some of the business conducted by Defendant occurred in Washington County.

II. PARTIES

3. Plaintiff, the State of Vermont, by and through Attorney General William H. Sorrell, is charged, *inter alia*, with enforcement of the Consumer Fraud Act, 9 V.S.A. §§ 2451 *et seq.*
4. Defendant, LIFELOCK, INC., is a Delaware corporation that is not registered as a foreign corporation, doing business in Vermont.

Office of the
ATTORNEY
GENERAL
Montpelier,
Vermont 05609

III. COMMERCE

5. Vermont's Consumer Fraud Act prohibits "unfair or deceptive acts or practices in commerce." 9 V.S.A. § 2453(a).

6. Defendant was at all times relevant hereto engaged in commerce affecting consumers in the State of Vermont, including advertising, soliciting, offering for sale and selling identity theft protection services and accepting money from Vermont consumers for the same.

IV. DEFENDANT'S COURSE OF CONDUCT

A. Defendant's Services Offered

7. Since at least July 4, 2005, Defendant has engaged in trade or commerce by advertising, soliciting, offering for sale, and selling identity theft protection services to Vermont consumers.

8. Defendant charges consumers \$10.00 per month, or \$110.00 per year, for its identity theft protection services.

9. Prior to September 2009, Defendant took the following steps for each consumer upon enrollment in its identity theft protection services:

- A. Requested that credit reporting agencies place a fraud alert on the consumer's credit record – a free service available to every consumer under both the Vermont and federal Fair Credit Reporting Acts; and
- B. Renewed fraud alerts that it placed with credit reporting agencies on behalf of its consumers every 90 days until instructed otherwise by the consumer.

10. After September 2009, Defendant discontinued the services specified in paragraph 9, but continued to offer identity theft protection services to consumers.

11. After a customer enrolls in its identity theft protection service, Defendant orders each customer's free annual credit reports from each of the credit reporting agencies – a free service available to every consumer under both the Vermont and federal Fair Credit Reporting Acts.

12. After a customer enrolls in its identity theft protection service, Defendant sends opt-out requests to credit reporting agencies requesting that customer's removal from pre-approved credit offer lists.

13. According to its website, Defendant's eRecon™ service "scours thousands of known criminal websites for illegal selling or trading of your personal information."

14. According to its website, Defendant's TrueAddress™ service "proactively detect[s] any new address information in address databases nationwide."

15. Defendant offers identity theft protection services for children.

B. Defendant's Representations Concerning the Effectiveness of Services

16. A full page advertisement in the Chicago Tribune, dated September 16, 2006, offered a promotion for Chicago residents and stated "[o]ur company makes your personal information useless to any criminal, immediately. We guarantee it." Ex. A.

17. A full page advertisement in The Wall Street Journal dated June 30, 2008, that appeared to be a news article about identity theft, stated "LifeLock became the nation's leader in identity theft protection by taking a proactive approach to protecting consumers from identity theft." Ex. B.

18. That same full page advertisement in The Wall Street Journal dated June 30, 2008, stated "I'm Todd Davis, CEO of LifeLock, and 457-55-5462 is my real Social Security number. I give it out to show how confident I am in LifeLock's proactive identity theft protection." *Id.*

19. A full page advertisement in the Chicago Tribune dated September 24, 2009, contained a picture of Todd Davis displaying his Social Security number and the caption read in part, "Todd Davis, CEO of identity theft protection company LifeLock, demonstrates his confidence in his company by sharing his Social Security number." Ex. C.

20. As of July 24, 2008, Defendant's website stated "LifeLock, the industry leader in proactive identity theft protection, offers a proven solution that prevents your identity from being stolen before it happens."

21. As of July 23, 2008, Defendant's website stated, with respect to identity theft protection for minor children, that "[w]e were the first company in the country that makes sure that kids are protected from Identity thieves."

22. The Wall Street Journal advertisement dated June 30, 2008, quotes Defendant's CEO Todd Davis describing Defendant's service that searched for information in criminal chat rooms: "We're working around the clock monitoring criminal web sites for the illegal selling and trading of our member's information...." Ex. B.

23. Defendant does not remove information found on criminal websites, but rather notifies customers that such information has been compromised.

C. Defendant's Representations about Fraud Alerts

24. As of July 7, 2008, Defendant's website stated that after a fraud alert was placed, "[i]f someone is trying to use your personal information, you will be contacted by the creditor that is issuing the line of credit. If you receive a call and you are not the one applying for credit, the transaction should be stopped immediately."

25. As of July 7, 2008, Defendant's website further stated that when a fraud alert is in place, "[e]very time you apply for new credit or someone tries to do something with your credit:

You should receive a phone call from the bank asking if you are actually the person applying for credit in your name. If you are, great. If not, the transaction stops.”

26. As of June 11, 2009, Defendant’s website stated, “LifeLock places fraud alert requests at the three credit bureaus and automatically renews the requests every 90 days. It does not freeze your credit, rather; it safeguards your credit from unauthorized use.”

D. Defendant’s Representations Concerning Risk of Identity Theft

27. In February 2009, Defendant caused to be mailed to consumers a direct marketing solicitation that stated: “You’re receiving this because you may be at risk of identity theft,” when in fact Defendant could not substantiate that any particular consumer was at risk for identity theft.

28. The February 2009 direct mail solicitation also stated: “WARNING: If you have used a credit or debit card before January 2009 YOU MAY BE AT RISK.”

E. Representations Concerning Defendant’s Service Guarantee

29. Defendant offers a \$1 million total service guarantee for its services.

30. The September 16, 2006 advertisement in the Chicago Tribune states, “We are so sure that our service works, we are backing it up with a \$1 Million Guarantee. If your identity is ever stolen while you are our client, we will fix the problem, repair your credit, and replace every dime you lost from the theft up to \$1,000,000.” Ex. A.

31. Defendant’s website states “[w]e will do whatever it takes to help you recover your good name and we will spend up to \$1,000,000 to do it.”

32. As of July 7, 2008, Defendant’s website claimed, “[i]f you lose money as a result of the theft, we’re going to give it back to you...”

33. In fact, Defendant's \$1 million total service guarantee does not replace out-of-pocket expenses, but covers the cost of lawyers, investigators, and case managers for customers who become victims of identity theft due to a failure of Defendant's service.

F. Defendant's Terms and Conditions

34. As of November 17, 2009, Defendant's terms and conditions contained a clause requiring each customer to "agree that any dispute, controversy or claim arising out of, or relating to, this Agreement or the Services shall be settled by confidential arbitration in Maricopa County, Arizona, in accordance with the American Arbitration Association's ("AAA") Commercial Arbitration Rules (including without limitation the Supplementary Procedures for Consumer-Related Disputes) then in effect."

V. APPLICABLE STATUTE

35. Vermont's Consumer Fraud Act prohibits "unfair or deceptive acts or practices in commerce." 9 V.S.A. § 2453(a).

VI. COUNT I

VIOLATIONS OF THE VERMONT CONSUMER FRAUD ACT

36. Defendant has engaged in a course of trade or commerce which constitutes unfair and/or deceptive acts and practices contrary to Vermont's Consumer Fraud Act in that Defendant:

- A. represented to consumers, expressly or by implication, that Defendant's services protect against all types of identity theft, including criminal and employment identity theft, when in fact Defendant's services did not protect against all types of identity theft;
- B. represented to consumers, expressly or by implication, that Defendant's services fully protect children from identity theft, when in fact Defendant's services do not fully protect children from identity theft;
- C. represented to consumers by implication that Defendant removes its customer's personal information from websites where criminals post fraudulently obtained personal information, when in fact Defendant only notifies consumers when their information appears on such websites;
- D. represented to consumers, expressly or by implication, that customers with fraud alerts will always receive a phone call prior to new credit being issued, when in fact a phone call is not required by either the Vermont or federal Fair Credit Reporting Acts and many times is not placed by the potential creditor;

- E. represented to consumers by implication that a security freeze or a credit freeze provide weaker proactive protection against unauthorized use of credit than a 90-day fraud alert, when in fact they can be even more effective;
- F. represented to consumers, through direct mail marketing, that those consumers were at high risk for identity theft, when Defendant had no knowledge or facts to substantiate such a warning to those consumers;
- G. represented to consumers expressly that it will reimburse customers for losses incurred, when in fact it only covers losses resulting from a failure or defect in Defendant's services;
- H. represented to consumers, expressly or by implication, that Defendant will pay customers back for expenses incurred as a result of identity theft, when in fact Defendant will pay a professional to restore losses and expenses only where the loss is due to a failure or defect in Defendant's services; and
- I. failed in print, television, radio advertisements and on its website to disclose that fraud alerts are not meant to act as a proactive measure for all consumers.

VII. STATUTORY REMEDIES

37. Vermont's Consumer Fraud Act provides, *inter alia*, for civil penalties of up to \$10,000.00 per violation, restitution to consumers, and reimbursement to the State of Vermont for the reasonable value of its services and its expenses in investigating and prosecuting the action. 9 V.S.A. § 2458.

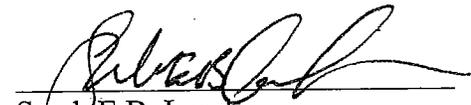
VIII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the State of Vermont, prays that this Court enter an Order:

- A. Finding that Defendant violated Vermont's Consumer Fraud Act, 9 V.S.A. § 2453(a), including, but not limited to, the unlawful acts and practices alleged herein;
- B. Temporarily, preliminarily, and permanently enjoining Defendant from engaging in the deceptive practices alleged herein;
- C. Declaring that all contracts entered into between Defendant and Vermont consumers by the use of methods and practices declared unlawful are rescinded and requiring that full restitution be made to said consumers;
- D. Assessing a civil penalty in the amount of Ten Thousand Dollars (\$10,000) per violation of the Act.
- E. Requiring Defendant to reimburse the State of Vermont for the reasonable value of its services and expenses in investigating and prosecuting this action;
- F. Providing such other and further equitable relief as justice and equity may require.

DATED at Montpelier, Vermont, this 9th day of March 2010

STATE OF VERMONT
WILLIAM H. SORRELL
ATTORNEY GENERAL

By: 

Sarah E.B. London
Assistant Attorney General
Public Protection Division
Vermont Attorney General's Office
109 State Street
Montpelier, Vermont 05609-1001
802-828-5479

Office of the
ATTORNEY
GENERAL
Montpelier,
Vermont 05609

Is that a Bull's-Eye on Your Waller?

Be Notice is under attack. Whoever caught it is a part of this report!

MAILED LEAVES STATE COUNCIL

Be warned! See us on the way!

MAILED LEAVES STATE COUNCIL

Be warned! See us on the way!

MAILED LEAVES STATE COUNCIL

Be warned! See us on the way!

ID Theft. Believe the Hype.

The National Bureau of Fraud just reported that this year alone, 2 million people will become victims of Identity Theft in the United States alone. How can you protect yourself against this horrific crime?

The FBI just reported that 10 million people have had their identities stolen.

Latest Data Breach

Our company makes your personal information safe immediately. We guarantee it. No other company in the industry why we are the fastest growing company in this industry, and why we have been featured in more than 300 news stories around the U.S. in outlets like *The Wall Street Journal*, CNN and CNBC.

We have a special offer for Chicago and especially those affected by the recent compromise: log on to our website at www.LifeLock.com or call our toll-free number this week. Mention the promotion code: "Chicago" when prompted and we will give you the first 30 days free. Once you are a client we're offering you 10% off your fees for life - your identity will always be safe.

I know the news of identity theft continues to alarm you, but don't worry we've got you covered.

We guarantee it.

Sincerely,



R. Todd Davis
Chief Executive Officer

7404 W. Detroit Street, Suite 100 | Chandler, Arizona 85226
toll free: 1 877 LIFELOCK (543-3562) | tel. 480.682.5100 | fax. 480.682.5101

OUR GUARANTEE:

We are so sure that our service works, we are backing it up with a \$1 Million Guarantee: If your identity is ever stolen while you are our client, we will fix the problem, repair your credit, and replace every dime you lost from the theft up to \$1,000,000. It's our guarantee!

WHAT WE DO FOR YOU:

- We guarantee that it works. If anyone steals your identity while you are our client, we fix it. Period.
- We block your credit so that only you can use it. We put alerts on your credit reports with all four major credit bureaus. You also receive free credit reports.
- We stop pre-approved credit offers. Our process alerts every company that sends out pre-approved credit offers to stop sending them to you.
- We drastically reduce the amount of junk mail you get. We alert companies that sell your name to junk mailers that you don't want their ads stuffing your mailbox.
- We ensure that everything goes smoothly when you want credit.

ADVERTISEMENT

IDENTITY THEFT REPORT:

Nation's leading identity theft protection service can help protect you from one of America's fastest growing crimes

TEMPE, AZ - Identity theft remains one of the fastest growing crimes in America, and has topped the FTC's list of consumer complaints for eight consecutive years. In fact, another identity is stolen every three to four seconds. So why is LifeLock CEO Todd Davis still giving out his real Social Security number to anyone who will listen?

Yes, That's His Real Number

"Because behind LifeLock's proactive approach and our \$1 million service guarantee, I'm more confident than ever before in LifeLock's ability to continue keeping my identity safe," Davis said.

"Of course, you should never share your Social Security number unless completely necessary," he added, "but for the record, mine is 457-55-5462."

LifeLock became the nation's leader in identity theft protection by taking a proactive approach to protecting consumers from identity theft. Why is that so important?

In the past, many people looked to credit monitoring after becoming victims of identity theft. According to Davis, that was the problem.

"Credit monitoring does nothing to stop identity theft. It only tells you after there's been suspicious activity on your account," Davis said. "LifeLock works to help stop identity theft before it happens by taking proactive steps to reduce the risk of identity thieves ruining your credit and good name - even if your information gets in the wrong hands."

More importantly, what LifeLock doesn't stop, we fix at our expense up to \$1,000,000. That's our \$1 Million Total Service Guarantee.

Does it work? Look at the facts.

"With over a million LifeLock members, statistically you would expect to see over 30,000 identity thefts annually, costing our members hundreds of hours and thousands of dollars," Davis said.

"Now, those are thefts that would come under the protection of our \$1 Million Total Service Guarantee, so our members would be out nothing, but we haven't seen anywhere near 30,000 victims. We haven't even seen 3,000."

The fact is, only 105 out of over one million LifeLock members have ever reported their identities stolen, and because of LifeLock's guarantee, none of them were ever out the time or money experienced by other identity theft victims.

And Davis is quick to add that he's one of the 105.

"Isn't that amazing? I have the most famous Social Security number in the world and LifeLock's only had to help me once."

The incident occurred a year ago when Davis' identity was used to get a \$500 payday advance loan. Davis points out that check cashing and payday advance companies are not required to check for fraud alerts to verify identities. It's a flaw in the law that he believes would have stopped the theft cold, but adds that's not the most important part of the story.

"What's important is the whole incident proves that LifeLock works, because I was never out a dime of my own money or hours of my own time. LifeLock protected me and the other 104 members exactly as they promised."

Davis is clearly passionate about his company and all it has accomplished.

"No one can stop all identity theft but our proactive

approach has resulted in successfully protecting over 99 percent of our members. That's unprecedented. And the less than one-tenth of one percent that fell victim to identity theft were completely protected by our guarantee."

So how big of a problem is identity theft?

Financial costs aside, identity theft victims can spend hundreds of frustrating hours talking to credit card companies, banks, police and credit bureaus repairing the damage. Now, when you factor in that thieves may hold onto information for six months before using it, and that a single stolen identity may be used up to 30 times, the full weight of the crime really begins to take shape.

\$1 Million Service Guarantee

The fact is you could already be a victim many times over and not know it for months.

Before becoming a member of LifeLock, one victim had two homes purchased and furnished using her name and personal information. Then, to add insult to injury, the thieves took out second mortgages on both homes as well.

Another had his identity stolen at age 7, but didn't find out until ten years later when he was denied a student loan and a job due to poor credit. He was 17-years-old and \$40,000 in debt because someone had purchased a houseboat in his name. He struggled for 10 years to clear his name.

"Children and young people are popular targets because no one regularly checks their credit history," Davis said. That's why LifeLock was one of the first companies to offer full protection to minors, including the \$1 million

service guarantee.

But it's not always about finances. Other types of identity theft have nothing to do directly with money.

One victim had his identity stolen by a man who went on to commit rape and murders using the victim's name. Another was turned

have already taken great strides toward guarding consumers.

Deter, Detect, Defend

"The FTC's site (www.ftc.gov/idtheft) does a great job of educating consumers with their "Deter, Detect, Defend" campaign," Davis

credit reports if they have been victimized or believe they could become a victim of identity theft. Fraud alerts can make it more difficult for someone to get credit in someone else's name because it tells creditors to use "reasonable policies and procedures" to verify the consumer's identity before issuing new credit in their name.

Consumers can request their annual credit reports by going to www.annualcreditreport.com. The site also has information on how to request free fraud alerts. Fraud alerts last 90 days, and then must be renewed. LifeLock facilitates requesting both the fraud alerts and credit reports on behalf of their members as part of their service. They also request renewals for the alerts every 90 days.

But that's not all LifeLock does.

"We're working around the clock monitoring criminal web sites for the illegal selling and trading of our members' information. We notify you when a change of address is made in your name to make sure it's not an identity thief rerouting your mail to them. We also have your name taken off of junk mail and pre-approved credit card lists because they're just one more avenue thieves can use to get your information."

"And if anything gets past us, you have the peace of mind knowing you're protected by our \$1 million service guarantee," he added. "There's a reason we're #1."

If you'd like the same peace of mind and comfort Davis and the rest of LifeLock's members enjoy, he'd like you to have LifeLock free for 30 days by calling 877 517 8293 or visit www.lifelock.com/free30.

Things You Can Do:

1. Place Fraud Alerts On Your Credit Report.

Fraud alerts make it extremely difficult for thieves to open new lines of credit in your name. Fraud alerts have proven 82% effective in stopping unauthorized use of personal information. You can place fraud alerts with all three major credit reporting agencies (Equifax, Experian, TransUnion), but alerts last only 90 days and must be renewed continuously to be effective.

2. Order ALL THREE Free Credit Reports.

Whether or not you are a victim of identity theft, take advantage of your free annual credit reports. Visit www.annualcreditreport.com.

3. Opt Out Of Unsolicited Credit Card Offers.

Opt out of pre-approved offers of credit at www.optoutprescreen.com. You may choose a five-year opt-out period or permanent opt-out status. This reduces the possibility of someone rifling through your mail and opening credit under your name.

4. Become Acquainted With A Shredder.

All read mail should go through the shredder before it goes to the trash. Though identity theft is steadily transferring to online forums, most identity theft is still done by trash digging. Using a shredder on all of your personal documents, makes the job for any would-be identity thief infinitely more difficult.

5. Let Experts Protect You.

While preventative measures can be done by anyone, many companies exist to provide consumers with expertise when it comes to the confusing ID theft issues. When selecting one of these companies, make sure that they provide the convenience, knowledge, support and protection found in LifeLock's proactive approach and \$1 million service guarantee.

down for public assistance because someone else was using the Social Security number of her 10-year old son and earning more money than her.

Davis is campaigning for even stronger federal protections from identity theft, but says the FTC and federal government

said. And Congress passed laws several years ago allowing consumers to get free annual credit reports from the three major credit bureaus so you can see exactly what is happening with your credit history."

The government also allows consumers to place free fraud alerts on their



I'm Todd Davis, CEO of LifeLock, and 457-55-5462 is my real Social Security number. I give it out to show how confident I am in LifeLock's proactive identity theft protection.

STATE'S

B

ing out his real Social Security number to anyone who will listen?

Yes, That's His Real Number

"Because between LifeLock's proactive approach and our \$1 million service guarantee, I'm more confident than ever before in LifeLock's ability to continue keeping my identity safe," Davis said.

"Of course, you should never share your Social Security number unless completely necessary," he added, "but for the record, mine is 457-55-5462."

LifeLock became the nation's leader in identity theft protection by taking a proactive approach to protecting consumers from identity theft. Why is that so important?

In the past, many people looked to credit monitoring after becoming victims of identity theft. According to Davis, that was the problem.

"Credit monitoring does nothing to stop identity theft. It only tells you after there's been suspicious activity on your account," Davis said. "LifeLock works to help stop identity theft before it happens by taking proactive steps to reduce the risk of identity thieves ruining your credit and good name - even if your information gets in the wrong hands."

More importantly, what LifeLock doesn't stop, we fix at our expense up to \$1,000,000. That's our \$1 Million Total Service Guarantee.

that would come under the protection of our \$1 Million Total Service Guarantee, so our members would be out nothing, but we haven't seen anywhere near 30,000 victims. We haven't even seen 3,000."

The fact is, only 105 out of over one million LifeLock members have ever reported their identities stolen, and because of LifeLock's guarantee, none of them were ever out the time or money experienced by other identity theft victims.

And Davis is quick to add that he's one of the 105.

"Isn't that amazing? I have the most famous Social Security number in the world and LifeLock's only had to help me once."

The incident occurred a year ago when Davis' identity was used to get a \$500 payday advance loan. Davis points out that check cashing and payday advance companies are not required to check for fraud alerts to verify identities. It's a flaw in the law that he believes would have stopped the theft cold, but adds that's not the most important part of the story.

"What's important is the whole incident proves that LifeLock works, because I was never out a dime of my own money or hours of my own time. LifeLock protected me and the other 104 members exactly as they promised."

Davis is clearly passionate about his company and all it has accomplished.

"No one can stop all identity theft but our proactive

lem is identity theft?

Financial costs aside, identity theft victims can spend hundreds of frustrating hours talking to credit card companies, banks, police and credit bureaus repairing the damage. Now, when you factor in that thieves may hold onto information for six months before using it, and that a single stolen identity may be used up to 30 times, the full weight of the crime really begins to take shape.

\$1 Million Service Guarantee

The fact is you could already be a victim many times over and not know it for months.

Before becoming a member of LifeLock, one victim had two homes purchased and furnished using her name and personal information. Then, to add insult to injury, the thieves took out second mortgages on both homes as well.

Another had his identity stolen at age 7, but didn't find out until ten years later when he was denied a student loan and a job due to poor credit. He was 17-years-old and \$40,000 in debt because someone had purchased a houseboat in his name. He struggled for 10 years to clear his name.

"Children and young people are popular targets because no one regularly checks their credit history," Davis said. That's why LifeLock was one of the first companies to offer full protection to minors, including the \$1 million

Things You Can Do:

1. Place Fraud Alerts On Your Credit Report.

Fraud alerts make it extremely difficult for thieves to open new lines of credit in your name. Fraud alerts have proven 82% effective in stopping unauthorized use of personal information. You can place fraud alerts with all three major credit reporting agencies (Equifax, Experian, TransUnion), but alerts last only 90 days and must be renewed continuously to be effective.

2. Order ALL THREE Free Credit Reports.

Whether or not you are a victim of identity theft, take advantage of your free annual credit reports. Visit www.annualcreditreport.com.

3. Opt Out Of Unsolicited Credit Card Offers.

Opt out of pre-approved offers of credit at www.optoutprescreen.com. You may choose a five-year opt-out period or permanent opt-out status. This reduces the possibility of someone rifling through your mail and opening credit under your name.

4. Become Acquainted With A Shredder.

All read mail should go through the shredder before it goes to the trash. Though identity theft is steadily transferring to online forums, most identity theft is still done by trash digging. Using a shredder on all of your personal documents, makes the job for any would-be identity thief infinitely more difficult.

5. Let Experts Protect You.

While preventative measures can be done by anyone, many companies exist to provide consumers with expertise when it comes to the confusing ID theft issues. When selecting one of these companies, make sure that they provide the convenience, knowledge, support and protection found in LifeLock's proactive approach and \$1 million service guarantee.

down for public assistance because someone else was using the Social Security number of her 10-year old son and earning more money than her.

Davis is campaigning for even stronger federal protections from identity theft, but says the FTC and federal government

said. And Congress passed laws several years ago allowing consumers to get free annual credit reports from the three major credit bureaus so you can see exactly what is happening with your credit history."

The government also allows consumers to place free fraud alerts on their

identity before issuing new credit in their name.

Consumers can request their annual credit reports by going to www.annualcreditreport.com. The site also has information on how to request free fraud alerts. Fraud alerts last 90 days, and then must be renewed. LifeLock facilitates requesting both the fraud alerts and credit reports on behalf of their members as part of their service. They also request renewals for the alerts every 90 days.

But that's not all LifeLock does.

"We're working around the clock monitoring criminal web sites for the illegal selling and trading of our members' information. We notify you when a change of address is made in your name to make sure it's not an identity thief rerouting your mail to them. We also have your name taken off of junk mail and pre-approved credit card lists because they're just one more avenue thieves can use to get your information."

"And if anything get's past us, you have the peace of mind knowing you're protected by our \$1 million service guarantee," he added. "There's a reason we're #1."

If you'd like the same peace of mind and comfort Davis and the rest of LifeLock's members enjoy, he'd like you to have LifeLock free for 30 days by calling 877 517 8293 or visit www.lifelock.com/free30.

SSN:
457-55-5462

Todd Davis,
CEO of LifeLock
SSN: 457-55-5462

I'm Todd Davis, CEO of LifeLock,

and 457-55-5462 is my real Social Security number. I give it out to show how confident I am in LifeLock's proactive identity theft protection.

Credit monitoring doesn't stop identity theft, it only alerts you after something has already happened. That's why LifeLock works to help stop identity theft before it happens by taking proactive steps to reduce your risk - even if your information gets in the wrong hands. And what we don't stop, we'll fix at our expense, up to \$1 million.

I'm so confident in LifeLock's ability to protect my identity I publish my real Social Security number. To give you that same level of confidence and peace of mind, I'd like to give you LifeLock for 30 days, absolutely free.

TRY FOR 30 DAYS

RISK FREE

CALL 877-517-8293

OR GO TO LIFELOCK.COM/FREE30

No payment, no obligation for 30 days. After 30 days your credit card will automatically be billed. You can cancel at any time without penalty.



LifeLock.

#1 In Identity Theft Protection

Do not share your Social Security number or personal information unnecessarily. WalletLock™ does not cover pictures, cash and other monies.

ADVERTISEMENT

ADVERTISEMENT

IDENTITY THEFT UP 22%, HITS 5-YEAR HIGH

Leader in Identity Theft Protection Strikes Back with Protection Offer for All

Identity theft has topped the Federal Trade Commission's list of consumer complaints for the past eight years.

Now, a stunning new survey shows a record 9.9 million Americans were victims of identity theft last year — a shocking 22% increase over the prior year — according to Javelin Strategy & Research. This news mirrors a just-released report from the Federal Trade Commission that cites a 21% increase in identity theft complaints during the same period.

These studies send a clear message: in the wake of the global economic crisis, identity theft is a big business. It's up to consumers to take proactive steps to help protect themselves.

That's why for a limited time, LifeLock, the industry leader in identity theft protection, is offering consumers who have a good faith suspicion that they have been a victim, or are about to become a victim of identity theft, a discount on their identity theft protection service.

"To take advantage of this special offer, all you have to do is call 1-800-871-8603 for an individual membership, or 1-800-616-0485 if you are enrolling more than one member," said Todd Davis, CEO of LifeLock. "It's that simple."

Consumers seeking identity theft protection can also receive the special discount by visiting www.lifelock.com and using the promo code: TRIBUNE1. Immediately upon enrollment, all LifeLock members are protected by LifeLock's \$1 Million Total Service Guarantee. (Restrictions apply. See lifelock.com for details.)

Why would you want to protect your identity? Consider some of the Javelin survey's specific findings:

"Friendly Frauds" Are Rising, and Costlier.

According to the survey, more than one in every ten victims knew the person who stole their identity. To make matters worse, these "friendly frauds" went undetected longer, had longer periods of misuse and cost consumers who knew the perpetrator more than double the expenses experienced by victims who didn't know their identity thief.

Identity Thieves Are Working Faster to Exploit Victims.

It also appears identity thieves are moving dramatically faster than they used

to when it comes to actually using stolen information.

In the past, thieves might hold on to purloined information for a longer period of time before using it. However, the Javelin survey revealed that incidents of thieves using stolen information within just a week of the theft more than doubled from 33% to 71% over the past three years.

Unfortunately, that doesn't mean I.D. thieves are not stockpiling victims' information: the report also showed that incidents of thieves using information stored for a year or more rose more than 50%.

Who is at Risk?

In this information age, many consumers could potentially be at risk, however, the Javelin survey revealed that women are 26% more likely to be victims than men. It also took women almost twice as long to detect I.D. theft than men, with women learning of the theft in 83 days on average, compared to 45 days for men.

The survey also named higher income consumers (households with combined incomes of \$75,000 or more) to be at higher risk.

Latinos were named the most likely demographic group to become victims of new account theft. Latinos are 47% more likely to become victims, versus 32% of all victims. New account theft, cited by the survey as the most difficult to detect, occurs when thieves open new accounts and lines of credit using stolen identities.

"At LifeLock we take proactive steps specifically to help reduce your risk of becoming a victim of new account



Never share your Social Security number unnecessarily.

Todd Davis, CEO of identity theft protection company LifeLock, demonstrates his confidence in his company by sharing his Social Security number. You should never give out your Social Security number unnecessarily. To take advantage of this special offer, simply call one of the numbers below or visit www.lifelock.com and use promotion code TRIBUNE1.

thrift," Davis said. "We are also determined to protect another high-risk group: young people and children."

Minors are a ripe target for identity predators, who know that it can take years before a child's I.D. theft is discovered. By then the damage is long done and can often ruin young people's lives and credit histories for years to come.

"That's why I feel it's so important for everyone who needs it to have protection available to them, and why I hope everyone will take advantage of this special discount," Davis added.

How Does LifeLock Work?

It's important to point out that no one can stop all identity theft. "But if you have a good faith suspicion that you are at risk of identity theft, what we can do is work to reduce the risk of identity thieves being able to cause LifeLock members harm, even if their information falls into the wrong hands," Davis said. "It's a service we back with our \$1 Million Total Service Guarantees."

(Restrictions apply. See lifelock.com for details.)

LifeLock combines a proactive approach designed to help detect and avoid identity theft, with 24/7 customer care that works to remove the stress, anxiety and countless hours of trying to repair the damage that usually accompanies identity theft.

"At the end of the day, what LifeLock is really working to provide is protection and peace of mind," Davis said. "And I think we do it better than anyone else."

To get LifeLock free for 30 days during this special offer, call 1-800-871-8603 for individual memberships, 1-800-616-0485 for multiple enrollments, or go to www.lifelock.com and use promo code TRIBUNE1. At the end of the 30-day free period your credit card will be billed automatically (\$10 monthly plan/\$110 annual plan) unless you cancel within the 30-day period. You can cancel anytime without penalty by calling 1-800-LifeLock. Offer good for new members only.

Help Protect Your Identity Now

Don't put your identity and good name at risk when you can have LifeLock's proactive protection. You can have peace of mind that comes with knowing you're covered by LifeLock. During this special offer, call one of the enrollment numbers below, or go online to www.lifelock.com, to help protect yourself and your family from one of America's fastest growing crimes FREE for 30 days. (At the end of the 30-day free period your credit card will be billed automatically (\$10 monthly plan/\$110 annual plan) unless you cancel within the 30-day period. You can cancel anytime without penalty by calling 1-800-LifeLock.) Representatives are available 24 hours a day. But hurry — this exclusive offer is limited only to those who call the numbers below and use the promotion code TRIBUNE1. Offer good for new members only.

PLEASE NOTE: If the line is busy, hang up and try the number again.

SINGLE TEL: 1-800-871-8603 **MULTIPLE** TEL: 1-800-616-0485

PROMO CODE: TRIBUNE1

\$1 MILLION TOTAL SERVICE GUARANTEE

If you become a victim of identity theft while a member of LifeLock due to a failure in our service, we will spend up to \$1 million to cover the cost for lawyers, investigators, case managers but not any direct losses as a result of the theft. Our \$1 Million Total Service Guarantee does not cover: lost wages or business profits, loss of business or lost opportunities and direct out-of-pocket expenses like postage stamps, gas or mileage to go to local authorities, or any notary public fees, etc. Under the Terms and Conditions, NO money passes directly to our LifeLock members.

You May Need Protection If:

You have a good faith suspicion that you have been, or are about to become, a victim of identity theft.

Real People. Real Stories. Real Identity Theft Protection.

STATE'S



Form 7538 2015/6/6

