

March 11, 2010



A Response to the Federal Trade Commission (FTC) Ruling Against Our Partner LifeLock

NOVA affirms the need for high standards for the identity theft protection industry that has over twenty companies seeking to provide services to consumers and/or remediation for victims.

LifeLock started in 2005 in an unregulated industry and pushed convention because of the nature of the crime of identity theft and lack of public awareness of vulnerabilities to the crime. There is greater perception now, in many ways thanks to LifeLock.

NOVA chose to pursue discussions with LifeLock because of serious concerns for victims of identity theft and NOVA's understanding of LifeLock's commitment to addressing the crime from protection and remediation standpoints. An official partnership was declared in April 2009. LifeLock's authenticity was unmistakable from the beginning.

The FTC ruling is a redress for advertising that the FTC claims was misleading to consumers for the period **March 2005 to April 2008**. There is no implication of criminal activity of any kind.

The FTC complaint alleges that LifeLock advertising promised to 'prevent' identity theft. LifeLock members have a \$1 million service guarantee for remediation that the FTC explicitly does not question.

The ruling also contends that LifeLock did not protect its own customers' information. Whatever security standards LifeLock might have had early on as a company, LifeLock obtained the highest security standard as of **January 2007**, three years ago, when LifeLock became **ISO 270001** certified.

Dealing with identity theft victims on a regular basis, NOVA recognizes the need for a variety of services, free and paid, to assist consumers and victims. FTC Chairman Leibowitz references *Javelin Strategy and Research* as a research reference (p. 20 of the press conference transcript). *Javelin Strategy and Research* (2009) that gives LifeLock services a 5-Star Excellent rating (p.34).

NOVA stands without reservation with LifeLock as a company committed to confronting the crime of identity theft, having provided free remediation services to hundreds of people, giving NOVA the privilege of offering free services to identity theft victims that call and implementing free training for thousands of law enforcement investigators across the country.

LifeLock is on solid financial footing and will continue and thrive because they are good people, a good company and committed to assisting victims of crime. As the oldest national victim assistance organizations in the nation, NOVA has found this alliance to be a solid contribution to crime victims' rights and services.

Kind regards,

A handwritten signature in black ink, appearing to read "Will", written over a faint, large, light-colored starburst graphic that is part of the background of the document.

Dr. Will Marling
Executive Director