



(ICFE) in San Diego, California. I have over thirty years of experience in consulting on matters of cybercrime and identity theft, and I am one of the nation's most well-respected and trusted experts on the subject as a consultant, speaker, media pundit, and expert.

3. I have worked with such companies as ExxonMobil, Intel, McAfee, MasterCard, Morgan Stanley, Merrill Lynch, KPMG, MIT, Transamerica and UPS, and almost every major media outlet has turned to me for information on identity theft, internet safety, crime prevention and security, including respected media such as The New York Times, The Wall Street Journal, TIME, USA Today, Anderson Cooper 360, Nightline and ABC World News Tonight. I have written four books on the subjects of security and cybercrime, including the bestselling book *99 Things You Wish You Knew Before...Your Identity Was Stolen* (Updated Ed., 2014).

4. Under the instant settlement, Defendants are offering Settlement Class Members one year of Experian's IdentityWorks<sup>SM</sup> Identity plan ("Identity Plan"), which includes the following benefits (*see* <https://www.experianidworks.com/identity>):

- a. Up to \$1 Million reimbursement insurance from American Bankers Insurance Company of Florida, an Assurant company, covering losses due to identity theft, stolen funds, etc.;
- b. Internet surveillance monitoring of thousands of websites and millions of data points using a variety of data gathering techniques—including chat room monitoring, spidering/crawling/scraping, and forum extraction—to identify

activity potentially associated with identity theft and provide prompt notification to the participating Settlement Class Member;

- c. Identity restoration reducing the time and effort associated with identity theft, with assigned restoration specialists providing robust support to assist participating Settlement Class Members in restoring their identities; and
- d. Extended fraud resolution with ExtendCARE™, including access to Experian's Fraud Resolution Agents even after the Identity Plan expires, a valuable feature giving extended life to the identity protection offered through the Identity Plan. If a participating Settlement Class Member suffers identity theft during or even after the one year of the Identity Plan expires, an Experian Fraud Resolution Agent will work directly with that Settlement Class Member from beginning to end to resolve the identity theft, including placing fraud alerts on credit reports, assisting with the dispute process for fraudulent information on credit reports or for fraudulent charges with financial providers, interacting with law enforcement or government agencies to resolve identity theft and, if possible, assist with a police report, and reviewing credit records to help determine potential areas of fraud. *See* <https://www.experian.com/data-breach/data-compromise>.

5. While Experian does not offer a comparable plan for sale to consumers online, the Value Plan sold by Identity Guard ("Value Plan") is a nearly identical service to the Identity Plan described above. Identity Guard offers its Value Plan online for \$7.50 per month. Like the Identity Plan, the Value Plan offers \$1 Million in identity theft insurance, Internet monitoring and

notifications of identity threats, and customer care support for managing threats and fraudulent activity. See <https://www.identityguard.com/plans/value>.

6. The differences between the Identity Plan offered to Settlement Class Members above and the Value Plan available to any consumer online are minor: e.g., the Value Plan offers a “Risk Management Score” that proactively measures how well a consumer is managing his or her risk of identity fraud, while the Identity Plan (through ExtendCARE™) offers a review of the consumer’s credit records to help determine potential areas of fraud (*see* ¶ 4(d), *supra*).

7. In fact, the Identity Plan’s inclusion of ExtendCARE™ makes it a considerably more valuable service than the Value Plan because it continues the dedicated fraud resolution support well beyond the one-year term of the Identity Plan.

8. Based on the online retail value of the Value Plan, along with the fact that the Identity Plan’s ExtendCARE™ is a superior feature for which comparable support is not included in the Value Plan, I estimate the retail value of the Identity Plan to be at least \$7.50 per month for each Settlement Class Member for the one year offered, and arguably more.

9. Thus, the minimum total value of the Identity Plan for each Settlement Class Member is Ninety Dollars (\$90.00).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of June, 2021.



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Robert Siciliano