EXHIBIT 69

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UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

CAT BROOKS and RASHEED SHABAZZ, individually and on behalf of all others similarly situated, Plaintiffs, v. THOMSON REUTERS CORPORATION, Defendant.	Case No. 3:21-cv-01418-EMC-KAW **DECLARATION OF RASHEED SHABAZZ IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Rasheed Shabazz, declare:

1. I am a Plaintiff in this action. I submit this declaration in support of Plaintiffs' motion for class certification. I have personal knowledge of the facts in this declaration and, if called as a witness, could and would testify to their accuracy.

2. I am resident of Alameda, California and am a journalist and community organizer. I recently completed my Masters of City and Regional Planning at UC Berkeley, and I currently serve in a variety of roles in which I work to inspire, support, and uplift voices in my community through public history, multimedia, and youth development projects. I care deeply about issues of fairness affecting my community and have spent considerable time and effort working to support people seeking justice in housing, education, and other aspects of civic life.

3. I never gave Thomson Reuters consent to collect, compile, or sell access to my information, and Thomson Reuters never asked me for my consent.

4. Thomson Reuters has never paid me for its use of my personal information.

5. I reviewed my profile in CLEAR under my current and former name. My profile contained errors, including suggesting that I had filed for divorce and may have outstanding familial support obligations, even though I have never been legally married and had no children at the time. And, as I understand it, because I changed my name to remove the association with people who had enslaved my ancestors, CLEAR marks me as a higher risk individual.

6. Except for the searches I allowed Quest Research & Investigations to run about me so that I could see what was in my CLEAR profile, I have never given anyone consent to search my information in CLEAR, including Thomson Reuters' customers.

7. When I learned that Thomson Reuters was selling access to my personal information in CLEAR, I started to opt out. But when Thomson Reuters asked me to provide a photograph of my government-issued ID and a separate picture of my face, I decided not to continue the process because I was not comfortable providing Thomson Reuters with even more personal information about me.

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8. I am asking to be appointed as a class representative so that I can represent all Californians whose personal information is available to be searched in CLEAR without their consent. It is my understanding that most Californians are not even aware of CLEAR and may not know that Thomson Reuters is selling access to their information to its customers. I believe that a class action will save time, money, and effort, and will help to prevent Californians' personal information from being shared without their consent.

9. I have been actively involved in this lawsuit since it started. I have answered interrogatories, kept in touch with my attorneys to track the case's progress, and have had my deposition taken.

10. I understand the responsibilities of a class representative to protect the interests of the class and am prepared to serve in that role. I am not aware of any conflict that would prevent me from fairly and adequately representing the class.

11. If the Court appoints me to serve as a class representative, I will continue to perform my duties to the best of my ability.

I declare under penalty of perjury that the foregoing is true and correct. Executed November 7, 2022.

Rasheed Shabazz

Rasheed Shabazz

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Signature Certificate

Reference number: EGRJE-KWAXX-K8DUA-KUMLM

Signer	Timestamp	Signature
Rasheed Shabazz Email: rasheed@berkeley.edu		
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Page 1 of 1

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