

EXHIBIT A-3

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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,)
) Case No.:
v.) 3:21-cv-1418-EMC
)
THOMSON REUTERS CORPORATION,)
)
Defendant.)
)

HIGHLY CONFIDENTIAL -- ATTORNEYS' EYES ONLY
DEPOSITION OF RASHEED SHABAZZ

AUGUST 18, 2022

9:12 a.m.

505 Howard Street, Suite 1000
San Francisco, California

REPORTED BY:

Siew G. Ung

CSR No. 13994, RPR, CSR

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
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1 APPEARANCES:

2

3 For PLAINTIFFS:

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1 (Discussion held off the record.)

2 (Recess taken.)

3 BY MS. MENALDO:

4 Q. So we were talking about your journalism
5 before the break. Do you consult public records in the
6 course of research --

7 A. Yes.

8 Q. -- for your journalism? Yes.

9 Do you consult public records for reasons
10 other than journalistic activities?

11 A. Yes.

12 Q. Briefly, what other reasons do you have for
13 consulting public records?

14 A. The genealogy example that I previously
15 shared, as well as for academic research.

16 Q. I am going to show you --

17 A. Excuse me.

18 Q. -- what is being marked as Exhibit 2.

19 (Whereupon, Exhibit 2 was marked for
20 identification.)

21 BY MS. MENALDO:

22 Q. Do you recognize this document? Did you --

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1 page there?

2 A. Oh, yes. Yes, ma'am.

3 Q. And -- and you did in fact make that request?

4 A. I did.

5 Q. Okay. What are historic demographics?

6 A. I was interested in understanding - so I think
7 I mentioned the swimming pool --

8 Q. Yeah.

9 A. -- example earlier. So I was interested in
10 understanding who was the membership at the sort of --
11 like the collective membership of this -- this group,
12 the APSA. So the -- the accusations that are being made
13 publicly by people is that it's basically all -- it's
14 been a whites-only swimming pool place.

15 Q. Hmm.

16 A. And I don't know if that's completely
17 accurate. So I requested this information to see if
18 they had anything about who their membership was to be
19 able to assess that claim.

20 Q. So you asked for personal information about
21 members of this organization to assess whether or not a
22 claim about the organization being a whites-only

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1 organization was true?

2 MR. TROUTMAN: Objection to form.

3 You can answer.

4 THE WITNESS: Can you rephrase the question?

5 BY MS. MENALDO:

6 Q. Do you consider race, gender, et cetera, to be
7 personal information?

8 A. I think depending on the scale.

9 Q. So something is personal information if it's
10 collected on a large scale, but not personal information
11 if it's not?

12 A. That's why people ID the -- the -- what is
13 it -- de-identify information. So, for example, the
14 United States Census Bureau collects information every
15 ten years, ACS every few years, and you can get
16 neighborhood demographics at the census tract level and
17 some information at the block level or the block group
18 level, but you can't get it at the block level, and that
19 is because there's concerns about that level of personal
20 information being shared. So historically, of course,
21 we have the example of, you know, the United States
22 using that data on the Japanese to put them in the

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1 concentration camps during World War II.

2 Q. So race and gender, et cetera, can be personal
3 information if it's tied to other individually
4 identifying information?

5 A. I think certainly. And then I imagine -- I
6 don't know how different people consider it, but people
7 with different racial identities, people who -- who have
8 passed, if you're familiar with the former practice of
9 people essentially pretending to be of one racial group
10 to escape something or whatever, or the same thing for
11 people with different gender identities. So there's
12 people who might be trans and who are outed, and they
13 did not ask anybody what their pronoun or -- or oth- --
14 or to -- to ask them that information, and then that
15 forces them to reveal their gender identity where it may
16 have been personal for them.

17 So I just say that to say it may be personal
18 for different people, and then other people they are not
19 tripping off of --

20 THE REPORTER: Other people they are not
21 tripping off of --

22 THE WITNESS: They're not as concerned.

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1 BY MS. MENALDO:

2 Q. So I'm not trying to put words in your mouth.

3 I'm just trying to kind of make sure I understand your

4 answer.

5 A. Yeah, sure.

6 Q. So race, gender, et cetera, might be personal

7 information for some people but not for other people?

8 A. Perhaps.

9 Q. Okay. Did you receive a response to this
10 public records access request?

11 A. I did.

12 Q. Did it include the information that you asked
13 for?

14 A. No.

15 Q. What did the response say?

16 A. This information was not being collected by
17 the swimming pool association and the City of Alameda,
18 who I made the request from. They didn't have that --
19 access to that.

20 Q. Okay. Do you think that in certain
21 circumstances -- perhaps like this one -- it might be
22 more important, because of the way that you're using

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1 A. Yes.

2 Q. And it includes some professional history.

3 Does that history look accurate to you?

4 A. At the time, yes.

5 Q. Okay. And it also has some information about
6 your personal life, that you're a yoga teacher, a
7 triathlete, a word traveler, you live with your two
8 cats, Safiya and Geronmio.

9 Is that accurate?

10 A. That's correct.

11 Q. And with apologies for asking you the same
12 question again --

13 A. It's all right.

14 Q. -- would you consider this more personal
15 information at the bottom of this profile to be your
16 personal information?

17 A. Absolutely. I have two black cats. Every
18 Friday, the 13th, it's like, man, don't let nobody do
19 nothing weird to my kittens. Well, they're not kittens
20 anymore, but yeah.

21 Q. In fact, you have a Tumblr about your two
22 cats. Is that true?

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1 A. I don't recall. I may have shared that with
2 my -- my Tumblr folks.

3 Q. Okay. I have one more exhibit and then I
4 think we can take a -- a break.

5 I'm sharing with you what's been marked as
6 Exhibit 22.

7 (Whereupon, Exhibit 22 was marked for
8 identification.)

9 BY MS. MENALDO:

10 Q. Do you recognize this document?

11 A. Yes.

12 Q. The "To" line says "To Rasheed Shabazz, from
13 Peter Hegarty," sent on December 13th, 2017.

14 Does this appear to be an email that you
15 received from Peter on that date?

16 A. Yeah.

17 Q. And this appears to be related to the movement
18 you described earlier to rename Haight Elementary
19 School, correct?

20 A. That's right.

21 Q. About halfway down the first page it says "For
22 immediate release."

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1 Is this a press release?

2 A. Yes.

3 Q. Okay. And did you draft this press release?

4 A. I did.

5 Q. Did you do that to try to get media attention
6 on this issue?

7 A. Yes.

8 Q. Were you hoping it would be published and
9 disseminated broadly?

10 A. Within Alameda, which was the intended
11 audience. That's why I sent it to Peter Hegarty and to
12 the Alameda Sun.

13 Q. Okay. And the press release includes a number
14 of quotes from you on -- I can refer you to the -- the
15 bottom of the first page, towards the top of the second
16 page and towards the bottom of the second page. Are
17 those accurate quotes from you?

18 A. Yes.

19 Q. Do you consider those quotations to be
20 personal information?

21 A. No.

22 Q. Under what circumstances do you try to get the

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1 media attention on -- on your personal or professional
2 accomplishments?

3 A. Hmm. I think similar to the point I raised
4 earlier about my story of housing insecurity and how
5 that's influenced my research career trajectory. I
6 think there are some instances where I might care for
7 something about to the extent that I will use my story,
8 maybe my name, where I say maybe both, maybe my story
9 and maybe my name to highlight an issue.

10 In this instance with the school, because I
11 had initiated this process and some misinformation had
12 began to spread on some Alameda social media, I was
13 willing to draft this and share this with Pete and
14 Dennis. Peter's -- he passed away -- the reporter at
15 the Alameda Journal, and then he's former editor of the
16 Alameda Sun.

17 But yeah, so I think as far as -- in each of
18 those instances, that's been like on this dossier
19 action -- or this compilation of things -- and some
20 things, you know, I -- that I chose to share at one
21 point. I think in these different instances, like my
22 story could be useful, perhaps, to inspire someone else

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1 to want to go to school, to want to pursue journalism.

2 So I mean it's cool to get some, like, pats on the back

3 sometimes. I'm not as interested in that personally,

4 opposed to, like, getting stuff done.

5 So if I got to make a quote -- like Peter

6 would always -- well, I won't get to it. He was always

7 like, well, who's the person who -- because he's trying

8 to attribute, you know, a quote to somebody -- not with

9 the rename Haight, but rename Jackson. It was always

10 like we need somebody to attribute the quote to. I'm

11 like, Well, it's a collective, it's not an individual.

12 So anyway, in some -- I'm saying this to say

13 in some instances, I would choose to share information

14 about myself or to make -- share my opinion about

15 something in order to further a cause. And in this

16 instance, like getting rid of this racist old government

17 was important to me.

18 Q. Okay. So -- so you'll sometimes seek media

19 attention to gain visibility on issues that you care

20 about?

21 A. Not for me individually. I'm a little bit

22 more go talk to this person, maybe you should talk to

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1 that person.

2 To utilize media to raise attention to

3 something, yes. Seek media attention for myself, no.

4 Q. Okay. Would it be fair to say you've gained

5 some prominence in your hometown of Alameda?

6 A. Gosh.

7 MR. TROUTMAN: Objection to form.

8 You can answer.

9 THE WITNESS: Okay.

10 BY MS. MENALDO:

11 Q. Do you understand the question?

12 A. I do, I do. It's -- it's -- it's a -- a legit

13 question. It's just -- or partially legit. Um, yeah,

14 there are some people who know my name and think they

15 know me. I'm trying --

16 Q. Would it be fair to say you have gained some

17 notoriety for your accomplishments?

18 A. Probably to a lesser extent, yeah.

19 Q. Last question before the break. Do you -- do

20 you feel like you have control over your information

21 after you've made it public?

22 A. Some and not others.

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1 of anyone, other than you and Ms. Brooks, who've had a
2 CLEAR report run on them?

3 A. No, not that I recall.

4 Q. When were you first aware that at least one
5 search had been run on your name or other identifying
6 information on CLEAR?

7 A. I'm sorry, can you repeat the question?

8 Q. I'll start in a different place, actually.

9 A. Okay. It wasn't a rephrasing. It was just
10 following.

11 Q. Are you aware that a search has been run on
12 your name in CLEAR?

13 A. Yes.

14 Q. And how did you become aware of that?

15 A. Yesterday I asked my attorneys and I was made
16 aware that a search had been run on me.

17 Q. Did you discuss that with anyone other than
18 your attorneys?

19 A. No.

20 Q. And you're referring to a deposition
21 preparation session with your attorneys yesterday?

22 A. Yes.

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1 Q. Okay. And the only people present at that
2 session were you and your attorneys?

3 A. That's correct.

4 Q. Who ran the searches of you in CLEAR?

5 A. I don't know.

6 Q. You don't know? Are --

7 A. I don't recall.

8 Q. Are you aware that one search was run by Quest
9 Research & Investigations?

10 A. Yes.

11 Q. Who is Quest Research & Investigations? And
12 we can refer to them as QRI because that's a mouthful.

13 A. Okay. Another acronym.

14 Q. Or Quest.

15 A. Yeah. No, that's fine. Yeah, that was or is
16 the PI firm that was hired, retained by one of our
17 attorneys to utilize the software to see what -- I don't
18 know, see what information was there on -- on -- I just
19 learned the -- the full acronym, the consolidated thing,
20 CLEAR.

21 Q. And the -- Quest was hired by your counsel?

22 A. Yes.

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1 Q. And to help prepare for this case?

2 A. Yes.

3 Q. You hesitated. You think there might have
4 been other reasons for hiring Quest other than to
5 prepare for this case?

6 A. They may have had a prior relationship with
7 them and trusted them, so that's why I took a breath, to
8 think if there was any other reason they may have hired
9 them.

10 Q. Okay. Were the searches run by Quest done
11 with your consent?

12 A. Yes.

13 Q. Do you object to the search having run on your
14 name?

15 A. I wanted to do it. I couldn't do it because
16 I'm an individual, and so I asked them to do it.

17 Q. Okay. Did you provide your consent to Quest
18 in writing or verbally?

19 A. I think it's in writing.

20 Q. What do you remember about that written
21 consent?

22 A. I don't recall much at this point. I believe

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1 A. Attempt to, yes.

2 Q. Okay. And that's why you made your Instagram
3 account private?

4 A. Yes.

5 Q. Okay.

6 MR. TROUTMAN: Nicola, just for clarification
7 for the record, you haven't asked him or don't want him
8 to verify that, you know, all these postings are his on
9 these couple hundred pages, are you?

10 MS. MENALDO: Well, I asked him if this looked
11 like a fair and accurate account of his Instagram
12 account.

13 MR. TROUTMAN: And I think he identified it by
14 just looking at the first couple pages. I just -- if
15 there's something buried in here, I don't know if
16 somebody hacked him and posted something three years
17 ago, you know, if later on somehow his testimony is
18 going to be construed to approving that all these pages
19 or all these pictures were posted by him.

20 MS. MENALDO: I don't need him to verify that
21 every single post --

22 MR. TROUTMAN: Okay.

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1 MS. MENALDO: -- was made by him if he can
2 verify that it generally looks like --

3 MR. TROUTMAN: Okay.

4 MS. MENALDO: -- what he remembers his
5 Instagram to look like and has no reason to believe that
6 it does have inaccuracies. I fully appreciate that you
7 may not have time right now to verify every single
8 image.

9 MR. TROUTMAN: Okay. Thank you.

10 THE WITNESS: Still just looking through.

11 MR. TROUTMAN: And Rasheed, I don't mean to
12 bog us down at all.

13 THE WITNESS: No, no, no. Yeah.

14 MR. TROUTMAN: I just want to make sure that
15 if there's something --

16 THE WITNESS: Within there --

17 MR. TROUTMAN: If you'd hacked ever, if
18 Instagram or Facebook has changed the content of your
19 account --

20 THE WITNESS: Yeah.

21 MR. TROUTMAN: -- you know, without looking at
22 every page -- and I -- I hope we don't have to look at

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1 500-plus pages, but...

2 THE WITNESS: Yeah, I got 3,500 posts. Go
3 through it at another time. Hmm.

4 BY MR. TROUTMAN:

5 Q. And you have a Twitter account as well?

6 A. I do.

7 Q. And you have thousands of followers?

8 A. I don't know the number of followers on it.

9 Q. Would you surprised if there were over 5,000?

10 A. No. I think it's like 5,000 or like close to

11 it or something. I don't know.

12 Q. Is it -- your Twitter account public?

13 A. Currently, yes.

14 Q. And do you ever post photos of yourself or
15 anyone else on Twitter?

16 A. I have.

17 Q. We spoke previously about your LinkedIn
18 account.

19 A. Yeah.

20 Q. Yeah.

21 A. Exhibit No. 1.

22 Q. So we've talked about LinkedIn, Facebook,

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1 Instagram and Twitter.

2 Are there any other accounts that you use
3 frequently in social media?

4 A. No. You mentioned my Tumblr earlier, but I
5 haven't looked at that for a while. And depending on
6 what you consider as a social media platform, YouTube.

7 Q. YouTube. You post videos to YouTube?

8 A. Not frequently.

9 Q. Are they videos of yourself or...

10 A. I have included like the -- the presentation
11 that you -- that you screenshotted, I believe that is on
12 my YouTube account.

13 Q. Okay. Has the public availability of your
14 information on your social media account and through the
15 other information that is available about you online
16 harmed you in any way?

17 A. How do you -- it's about how you -- how do you
18 define "harm"?

19 Q. I'll -- I'll let you define it however you'd
20 like.

21 A. Hmm. So I'm sorry, ask me that question one
22 more time.

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1 Q. Has the public availability of your personal
2 information on social media accounts and in other public
3 sources on the internet harmed you?

4 A. I think there's been some folks who have
5 attempted to harm me, but not necessarily like some of
6 the personal information --

7 THE REPORTER: Some of the personal
8 information?

9 THE WITNESS: Oh, I apologize.

10 THE REPORTER: I just didn't get the last two
11 words.

12 THE WITNESS: Yeah, the personal information
13 that I've shared. So for instance, you know, sharing
14 this photo of me with orange shorts and an orange hat in
15 high school, that one hasn't come back on me yet.

16 BY MS. MENALDO:

17 Q. So is your answer to the question yes or no?

18 A. No.

19 Q. No.

20 Do you use Google Alerts?

21 A. Yes.

22 Q. What Google Alerts do you have set up?

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1 A. I literally was snatched off the street at
2 this. I came late to court.

3 Q. I'm sorry, I didn't hear the end of your
4 response.

5 A. Sure, yeah. So I -- simple answer, yes.

6 Q. Okay. And the arrests in 2000 and 2001 are
7 not reflected on this report, correct?

8 A. That's correct.

9 MS. MENALDO: And we can take a break now.
10 It's 5 o'clock.

11 THE WITNESS: Thank you.
12 (Recess taken.)

13 BY MS. MENALDO:

14 Q. Okay. Are you aware of any CLEAR reports with
15 your information that were provided to CLEAR customers
16 other than those provided to QRI?

17 A. I understand that there were other searches
18 that were run, but I don't know if the search ultimately
19 ends with this report.

20 Q. What do you know about the other searches that
21 were run?

22 A. That they happened.

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1 Q. Do you know anything else about them?

2 A. I don't recall any specific detail.

3 Q. And did you learn about those searches before
4 or after you filed your complaint?

5 A. I believe aft- -- I mean -- but you mean the
6 searches besides QRI?

7 Q. Correct.

8 A. Yeah, I believe it was after.

9 Q. Are you aware of any CLEAR reports that have
10 been generated about any person other than you or
11 Ms. Brooks?

12 A. No.

13 Q. We were talking a little earlier about harm
14 and I -- and I want to sort of just wrap that up.

15 A. Sure.

16 Q. How would you describe how you were harmed?
17 Do you describe it as your privacy was invaded?

18 A. No.

19 MR. TROUTMAN: Objection to form.

20 You can answer.

21 BY MS. MENALDO:

22 Q. No?

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1 A. That's not how I describe it.

2 Q. Would you describe it as a loss of control of
3 information about you?

4 A. That's part of how I describe it.

5 Q. Would you describe it as the value of your
6 personal information decreasing?

7 A. I don't -- I don't know how I -- how I value
8 my personal information, meaning, I think, generally --
9 and this is a generalization -- value is often thought
10 of as some sort of, like, monetary value, opposed to,
11 like, I just value, like, this is information about me
12 and I want to be able to choose who I share it with.

13 Q. Do you believe that your personal information
14 has monetary value?

15 A. I believe my personal information has been
16 monetized.

17 Q. Have you ever attempted to sell your personal
18 information?

19 A. No, not that I -- not that I recall. I don't
20 think so.

21 Q. Did you lose any money as a result of the
22 allegations in your complaint?

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1 A. Can you rephrase the question?

2 Q. Would you describe your harm as having lost
3 money?

4 A. If CLEAR's getting money or Thomson Reuters is
5 getting money through CLEAR selling my information, and
6 I could have sold -- sold it if I had chosen to do so,
7 that's money that's not feeding my family.

8 Q. Do you think you could have sold your personal
9 information, had you chosen to do so?

10 A. I don't know how or where, but I'm sure
11 there's some sort of, I don't know, information exchange
12 I could have done that on. I wouldn't do it, though.

13 Q. Have you lost -- would you describe the harm
14 you suffered as having lost property?

15 A. Probably not. I -- just my thoughts around
16 conceptions of property.

17 Q. I'm talking about physical or real property.

18 A. I think still --

19 THE REPORTER: I still -- something --

20 THE WITNESS: Oh, sorry.

21 I know there's, like, a legal definition of
22 real property, and in urban planning that has a

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1 different conceptual understanding historically. So
2 that's why I'm just like I don't know how I can answer
3 that question.

4 BY MS. MENALDO:

5 Q. Okay. Do you consider your personal
6 information your property?

7 A. Yes. And my prerogative.

8 Q. Would you describe the harm you suffered as a
9 physical injury?

10 A. I don't think that's how, like, physical
11 injury's defined, so I don't know -- I don't know. That
12 sounds like a legal definition thing.

13 Q. I've given you a lot of examples of ways you
14 could describe your harm.

15 A. Yeah, yeah.

16 Q. Why don't you restate for me one more time how
17 you would describe the harm you suffered as a result of
18 the allegations made in your complaint?

19 A. Well, I appreciate it -- I appreciate, like,
20 the potential framework of how harm might be defined, of
21 like theft or property, physical harm or injury.

22 I want to say CLEAR sold my stuff and sold it

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1 on the data market. I don't know how inaccurate that is
2 because I don't know exactly how all of CLEAR, you know,
3 functions. It's still kind of an enigma. But the harm
4 is that Thomson Reuters has been collecting information
5 about me for however long, has gone back farther than I
6 may know because I don't know what's been produced since
7 2020, and it's making that information available to
8 whoever and I don't know who that is. I didn't say they
9 could do it. And I don't know how much my information
10 would be valued at. I feel priceless. I mentioned like
11 a zillion earlier. I don't know even know how many
12 zeros that is. But I think the harm at its core is just
13 this product being created and used to monetize my life
14 or representations of me.

15 And this information is not all public. It's
16 not even just compiling this information like you've
17 done. It's -- it seem -- looks like it's stuff that
18 they probably had to pay for, "they" meaning Thomson
19 Reuters. And then now they're packaging it to flip it.
20 It's like how people flip a house to sell. I feel like
21 my identity's being flipped to make money.

22 Q. And how does that harm you?

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1 A. Hurts my feelings.

2 Q. Do you think that your description of the harm
3 you suffered is similar to how others would describe the
4 harm they suffered from CLEAR?

5 MR. TROUTMAN: Objection to form.

6 You can answer.

7 MS. MENALDO: I'll rephrase.

8 BY MS. MENALDO:

9 Q. Do you think everyone in California would be
10 impacted the same way that you have been impacted by the
11 inclusion of their information in CLEAR?

12 A. Yes. Now, would they describe it the same
13 way? I'd probably use unique terminology.

14 Q. Do you believe that the value of your personal
15 information has been reduced because of CLEAR?

16 A. I don't know.

17 Q. Do you believe you've lost control over the
18 ability to disseminate and sell your own data?

19 A. If I had the ability to sell, possibly. But I
20 think that CLEAR has taken control or has taken the
21 possibility of me having control over it.

22 Q. But you're not sure if you have the ability to

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2 Washington, D.C. 20036
(202) 232-0646

3
4 SIGNATURE PAGE
Case: Cat Brooks and Rasheed Shabazz, et al. v. Thomson Reuters Corp.
5 Witness Name: Rasheed Shabazz
Deposition Date: August 18, 2022

6
I do hereby acknowledge that I have read
7 and examined the foregoing pages
of the transcript of my deposition and that:

8
9 (Check appropriate box):
() The same is a true, correct and
10 complete transcription of the answers given by
me to the questions therein recorded.
11 (X) Except for the changes noted in the
attached Errata Sheet, the same is a true,
12 correct and complete transcription of the
13 answers given by me to the questions therein
14 recorded.

15
16 09/21/2022 Rasheed Shabazz
17 DATE WITNESS SIGNATURE

18
19
20
21 9/21/2022 * see attached *
22 DATE NOTARY

8/18/2022

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5

6 ERRATA SHEET
7

8 Case: Cat Brooks and Rasheed Shabazz, et al. v. Thomson Reuters Corp.
9 Witness Name: Rasheed Shabazz
10 Deposition Date: August 18, 2022

11	Page No.	Line No.	Change
12	16	13	change "comfortable" to "uncomfortable"
13	24	4	delete "if"
14	117	6	"CLEAR" should be "clear"
15	203	14	"usin" should be "using"
16	253	21	change "of" to "in" and delete "cinder"
17	313	21	delete "0"

18
19
20

21  9/21/2022
22 Signature Date

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Alameda

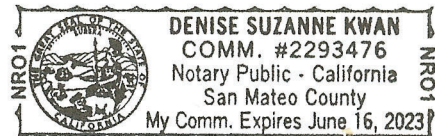
On Sept. 21, 2022, before me, Denise Suzanne Kwan, Notary Public, personally appeared Rasheed El Shabazz,

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature  (Seal)



Attached to Rasheed Shabazz Deposition Transcript and
(Name of Document) Errata Sheet