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UNITED STATES DISTRICT COURT
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

**DECLARATION OF DAANI-RUTH
SVONKIN IN SUPPORT OF THOMSON
REUTERS' CLASS CERTIFICATION
OPPOSITION**

REDACTED - PUBLICLY FILED
VERSION OF DOC. 153
PURSUANT TO COURT ORDER,
DATED MARCH 21, 2023 (DOC. 178)

EXHIBIT
C

1 I, Daani-Ruth Svonkin, declare as follows:

2 1. I am a Senior Client Executive at Thomson Reuters. I make this declaration based
3 upon personal knowledge and if called upon to do so I could and would testify competently to the
4 facts set forth herein.

5 2. I am a California resident and have lived in the state since 1969. I currently reside
6 in San Bernardino County, California.

7 3. As a Senior Client Executive at Thomson Reuters, I am responsible for managing
8 client relationships related to Thomson Reuters' CLEAR. I conduct training for current and
9 potential customers on how to use CLEAR, and interface with current and potential customers on
10 their product needs. I have performed these tasks for Thomson Reuters since I joined the
11 company in 2016.

12 4. Before starting at Thomson Reuters, I worked in the San Bernardino Police
13 Department ("SBPD") for nearly 23 years, from August 1993 to May 2016. From 1997 until May
14 2016, I worked as an Asset Forfeiture Analyst within the Vice & Narcotics Unit. In that role, I
15 was responsible for assisting law enforcement officers and investigators in researching
16 individuals and entities relevant to ongoing law enforcement investigations.

17 5. In my role at SBPD, I assisted in law enforcement efforts responding to the 2015
18 shooting at the Inland Regional Center in San Bernardino, California, which has become
19 commonly known as the San Bernardino terrorist attack. As the attack was still under way, I
20 supported the Vice & Narcotics team that responded to the Inland Regional Center. As we were
21 searching for the perpetrators, a witness provided the police with a license plate number for a
22 black SUV believed to be relevant to the investigation. Using this license plate, I learned through
23 the California teletype service that the SUV was registered to a rental car agency. Using this
24 information, I was able to contact the rental car agency that rented the vehicle and learn the name
25 of the suspect who rented the car. Authorities gathered multiple addresses for that suspect, but
26 none had been verified or confirmed. I used CLEAR to search the suspect's name and quickly
27 obtained a recent address associated with the suspect. That address was unique and different from
28 the addresses that authorities had gathered to that point. The CLEAR report reflected that the

1 address was very recent. I reported that information to an SBPD Sergeant, who then directed
2 officers to that address. At that time, those officers were attempting to locate the suspect at a
3 different address (and were redirected to the address I found via CLEAR).

4 6. When officers were at the address I provided to them for the suspect based on
5 CLEAR, they saw the suspect's SUV exit a driveway at that address with two people in it. The
6 SUV was departing the residence and appeared to be heading back to the Inland Regional Center
7 (the original scene of their shooting). Officers then engaged in pursuit and ultimately intercepted
8 the vehicle. The suspect was one of the occupants. The vehicle contained more firearms,
9 ammunition, and a trigger device for an explosive ordinance believed to have been left behind at
10 the Inland Regional Center. It was later established that the suspect and the other occupant were
11 returning to the Inland Regional Center, with the goal of detonating improvised explosive devices
12 and harming more people.

13 7. Among the tools available to SBPD, CLEAR was the only one able to provide
14 SBPD with the address for the suspect. Without CLEAR, we would not have sent officers to the
15 address where the suspect was located. CLEAR's ability to provide this information was essential
16 to the SBPD's ability to apprehend the suspect and prevent a greater tragedy.

17 8. Attached as Exhibit C-1 (TR-BROOKS001855-001858) is a Case Study on that
18 attack that accurately reflects the day's events and how CLEAR was used.

19 9. Throughout my employment with SBPD I used CLEAR or platforms like it. I used
20 CLEAR at SBPD for several law enforcement purposes. I primarily used it to locate and gather
21 contact information for criminal suspects, witnesses, and victims, and to test and verify
22 information provided to SBPD by suspects and witnesses. For example, if officers had obtained a
23 statement from a suspect stating they were holding money for another person, I would use
24 CLEAR to identify that individual's address, phone number, or possible associates to assist in the
25 investigation. I also used CLEAR to support law enforcement investigations in identifying
26 relationships between individuals relevant to an investigation.

27 10. While at SBPD I was aware of the following other teams that regularly used
28 CLEAR:

- 1 • Robbery and Homicide, a team responsible for investigating robberies and
- 2 homicides, which used CLEAR in the same manner as I described for Vice &
- 3 Narcotics, above;
- 4 • Sexual Assault, a team responsible for investigating sexual assaults, which used
- 5 CLEAR in the same manner as I described for Vice & Narcotics, above;
- 6 • Crime Analysis, a team of general-purpose analysts that assists detectives in
- 7 researching individuals identified during investigations, which used CLEAR in the
- 8 same manner as I describe for Vice & Narcotics, above;
- 9 • Patrol, uniformed officers performing law enforcement duties in the streets of San
- 10 Bernardino, who used CLEAR for a variety of functions including finding missing
- 11 persons, identifying criminal suspects, witnesses, and victims, and locating persons
- 12 relevant to daily law enforcement duties.

13 11. Based on my experience, without CLEAR or public records platforms like it, I
14 believe that SBPD would have been critically limited in its ability to perform its law enforcement
15 responsibilities. Investigators and officers' jobs would have been significantly more difficult and
16 less efficient. Without access to CLEAR, officers and investigators would need to collect and
17 verify information directly from individuals more often, such as by physically tracking and
18 following potential suspects to determine where they live or digging through trash to attempt to
19 identify who resides at a certain location. These techniques require significantly more time and
20 effort from officers.

21 12. Because CLEAR allows law enforcement officers to spend less time tracking cold
22 leads and is generally very accurate, I believe that if SBPD had not had access to CLEAR or
23 public records platforms like it, vastly more crime would have gone unsolved (and would
24 continue to go unsolved) in San Bernardino.

25 13. I chose to take a job at Thomson Reuters because of my firsthand experience with
26 the value CLEAR provides. My background and training enables me to help our customers use a
27 tool that can make an immediate impact in their daily investigations and respond to incidents such
28

1 as the San Bernardino attack. By moving into my current role, I felt I could make an impact by
2 providing valuable tools to law enforcement and other government agencies around the country.

3 14. As a Client Executive, I have trained a variety of customers in law enforcement
4 and other fields. I work with law enforcement entities, public defenders' offices, court systems,
5 tribal casinos, gaming and licensing compliance boards, child support programs, and more. For
6 example, my position has given me personal knowledge of the ways in which customers use
7 CLEAR. These include, for example:

- 8 a. By California police departments, for: the same law enforcement uses I
9 described above in Paragraph 9; community support (such as helping elderly
10 persons with dementia return home); locating missing children and returning
11 them to their families (as described in the attached Exhibit C-2); and
12 eliminating suspects (to verify information provided as part of establishing an
13 alibi).
- 14 b. By pension funds, such as the [REDACTED] to
15 avoid pension fraud, by using death notifications to update records to confirm
16 when pensioners and surviving beneficiaries have passed away.
- 17 c. By state agencies, such as [REDACTED]
18 [REDACTED] to identify owners of properties in the course of investigating the need
19 for environmental cleanup on those properties.
- 20 d. By the [REDACTED] Courts to issue collection notices
21 for court fees and fines, and locate individuals who have not paid those fees or
22 fines.
- 23 e. By public defenders' offices throughout California (including [REDACTED]
24 [REDACTED] County) to defend the accused.
- 25 f. By the [REDACTED] School District to verify student residency for
26 purposes of enrollment.
- 27 g. By Indian casinos to help prevent money-laundering and ensure compliance
28 with relevant anti-money laundering laws.

1 h. By government agencies, to investigate or combat government benefit fraud
2 (an example of this use is described in Exhibit C-3 to this Declaration).

3 15. As a California resident, I have seen firsthand how I benefit from CLEAR. Based
4 on my experience and knowledge of CLEAR and its uses, law enforcement's use of CLEAR
5 helps protect public safety, and I would be harmed if the platform was limited with respect to the
6 data it contains or the individuals capable of being searched. The breadth of government agencies
7 using CLEAR also helps me in other ways as a Californian, such as protecting the environment,
8 and generally ensuring the proper functioning of government services such as school, court, and
9 tax and revenue systems (all as described above). I believe that the benefits provided by CLEAR
10 to me as a Californian outweigh any potential "harms" of CLEAR to me.

11 16. **Business Records:** Attached to this Declaration are Exhibits C-1 (TR-
12 BROOKS001855-001858), C-2 (TR-BROOKS054555-TR-BROOKS054556), and C-3 (TR-
13 BROOKS002051-TR-BROOKS002053) (collectively the "TR Business Records"). The TR
14 Business Records are Thomson Reuters records, made at or near the time of the recorded acts,
15 events, conditions, opinions, or diagnoses, by (or from information transmitted by) someone with
16 knowledge. The TR Business Records were kept in the course of a regularly conducted activity of
17 Thomson Reuters. Making the TR Business Records was a regular practice of that activity.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 [signature on following page]
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Executed on January 24, 2023, in RUNNING SPRINGS, CALIFORNIA



Daani-Ruth Svonkin

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