EXHIBIT 1

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Attorneys for Plaintiffs and the Class

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,

Plaintiff,

v.

THOMSON REUTERS CORPORATION,

Defendants.

Case No. 3:21-cv-01418-EMC-KAW

DECLARATION OF JONATHAN P. SHAFFER WITH POST-DISTRIBUTION ACCOUNTING

I, Jonathan P. Shaffer, declare and state as follows:

1. I am a Senior Project Manager with Angeion Group ("Angeion"), located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this action and I have personal knowledge of the facts set forth herein.

2. Angeion submitted declarations leading up to Final Approval of the Settlement in this action, detailing the services Angeion provided in: mailing CAFA Notices, creating and implementing a media notice program (including digital banner ads, Social Media ads (Facebook, Instagram, YouTube), Legal Influencer videos (Instagram and TikTok), Paid Search, Sponsored Class Action Website Listing, and a press release), creating a website with an online claims portal, processing Claims and requests for exclusions, corresponding with Claimants, and communicating with the Parties' counsel regarding each of these steps; and the result of those services. (Dkt. Nos. 273-2 and 277).

3. On February 21, 2025, the Court granted final approval to the Settlement and ordered that a Post-Distribution Accounting be filed with the Court and posted on the Settlement Website within 21 days after the completion of the distribution of settlement funds (Dkt. No. 80).

4. On April 15, 2025, Angeion sent distribution payments to the claimants who submitted valid claims.

5. Pursuant to the United States District Court for the Northern District of California's Procedural Guidance for Class Action Settlements, Angeion Group, LLC submits the following Post Distribution Accounting Report:

SETTLEMENT DETAILS	
Total Settlement Fund	Gross Settlement Fund: $27,646,323.75[1]
Total Number of Class Members	up to 40,000,000

[1] $27,500,000 in initial funding plus $146,323.75 interest received.

NOTICE DETAILS	
Methods of Notice	Media Notice ▪ Banner Ads ▪ Social Media Ads ▪ Paid Search ▪ Legal Influencer videos ▪ Sponsored Class Action Website Listing ▪ Press Release
Total Number of Digital Banner Ad Impressions Served	51,555,443
Total Number of Social Media Ad Impressions Served	24,959,875

CLAIM FORM SUBMISSIONS, EXCLUSIONS AND OBJECTIONS	
Total Number of Claim Forms Submitted	752,034 Claim form Submissions ▪ 750,439 On-line submissions ▪ 1,595 Mail submissions
Total Number of Valid Claim Forms Submitted and Approved	125,241[2]
Percentage of Valid Claim Forms (relative to Class)	0.313%
Total Number of Opt-Outs Submitted	50
Percentage of Opt-Outs Submitted (relative to Class)	0.000001%
Total Number of Objections Submitted	0
Percentage of Objections Submitted	0.000%

[2] For more information regarding the significant volume of fraudulent claims, see the Declaration of Steve Weisbrot, ECF No. 273-2 (unredacted and filed under seal at ECF No. 272-3).

SETTLEMENT PAYMENT DETAILS	
Method(s) of Payment to Class Members	Physical Checks sent by the United States Postal Service ("USPS") first-class mail, postage prepaid; Venmo, Zelle and Virtual Prepaid Card.
Total Number of Cash Payments Issued to Class Members	125,241
Total Class Members distributed via ACH (% of Total)	4,434 (3.54%)
Total Class Members distributed via Checks (% of Total)	10,707 (8.55%)
Total Class Members distributed via PayPal (% of Total)	24,035 (19.19%)
Total Class Members distributed via Venmo (% of Total)	35,712 (28.51%)
Total Class Members distributed via Virtual Prepaid Cards (% of Total)	25,055 (20.01%)
Total Class Members distributed via Zelle (% of Total)	25,298 (20.20%)
Total Cash Amount Distributed to Class Members	19,548,867.69
Average Recovery Per Claimant	Each claimant received $156.09.
Median Recovery Per Claimant	Each claimant received $156.09.
Total Number of Payments Issued to Class Members and **Not** Cashed/Cleared	As of October 17, 2025, 905 checks have not been cashed.
Total Value of Payments **Not** Cashed/Cleared	As of October 17, 2025, checks worth a total of $141,261.45 have not been cashed.
Total Number of Payments Issued to Class Members that **have** Cashed/Cleared	As of October 17, 2025, 124,336 checks have cashed/cleared.

Total Value of Payments that **have** Cashed/Cleared	As of October 17, 2025, checks worth a total of $19,407,606.24 have cashed/cleared.
Smallest Payment Amount	$156.09
Largest Payment Amount	$156.09
Total Amount Remaining in Settlement Fund	$136,739.59
Total Administration Costs	$545,000.00
Attorneys' Fees	$6,875,000.00
Attorneys' Costs Excluding Expert Costs	$402,851.54
Expert Costs	$268,033.75
Attorneys' Fees as a Percentage of the Settlement Fund	25%
Total Attorneys' Fees and Costs	$7,545,885.29
Plaintiffs' counsel's final lodestar total	$5,559,647.50
Lodestar Multiplier	1.24

6. A second distribution to Authorized Claimants[3] is not economically feasible in my professional opinion. Angeion estimates the administrative cost to effectuate a second round of payments to the 124,336 Authorized Claimants would be approximately $49,167. After deducting anticipated administration costs, there would be approximately $87,572.59 remaining in the Settlement Fund that could be distributed to Authorized Claimants. The pro rata payment amount would be approximately $0.70 per Claimant, as reflected in the chart below. It has been Angeion's general experience that lower check amounts often result in a higher percentage of uncashed checks, as Class Members are less motivated to cash/negotiate a check for that lower amount. Furthermore,

[3] Authorized Claimants are Class Members who have successfully received their payment and excludes the 905 individuals who have not yet cashed their checks.

the costs associated with distributing the payments would surpass the actual value of the payment itself. In light of this, Angeion has recommended to the Parties that a second distribution is not economically feasible and recommends the remaining funds be distributed pro rata to Cy Pres Recipient(s), as contemplated in the Parties' settlement agreement and the Court's Final Approval Order.

Second Distribution Fund Calculation	
Total Amount Remaining in the Settlement Fund	$136,739.59
Approximate Administrative Costs to Effectuate a Second Distribution	$49,167
Approximate Total Remaining in the Settlement Fund for a Second Distribution	$87,572.59

Second Distribution Class Member Pro Rata Settlement Benefit	
124,336 @ $0.70	$87,035.20
Rounding Variance (Undistributed)	$537.39

7. The pre-paid digital payment card (virtual Prepaid Mastercard) product offered to Settlement Class Members in this case has many of the features of pre-paid digital payment cards offered outside the class action context, but also includes certain additional consumer-friendly features designed specifically for class action usage, including:

a) No activation or load fees;
b) The ability of the cardholder to transfer balances at any time and at no cost to the cardholder;
c) No inactivity fees to the cardholder until after 12 consecutive months of inactivity;
d) Proactive email reminder to cardholders at 11 months to encourage use; and,

e) Refund of inactivity fees if the cardholder re-engages through a use of value on the card following service fee assessment.

8. Angeion directs the distribution of funds from the Settlement Account to Class Members via digital payment options through enterprise-wide agreements with two vendors: Digital Disbursements[4] and Blackhawk.

9. Digital Disbursements is responsible for establishing and implementing the payment election feature on the Settlement Website that allows Class Members to select their preferred payment method from the menu of digital payment options. At the time of distribution, Digital Disbursements facilitates digital payments to Settlement Class Members through Venmo and Direct Deposit.

10. Blackhawk is the digital payment solutions vendor engaged to facilitate and manage pre-paid digital payment cards issued by the bank to Class Members.

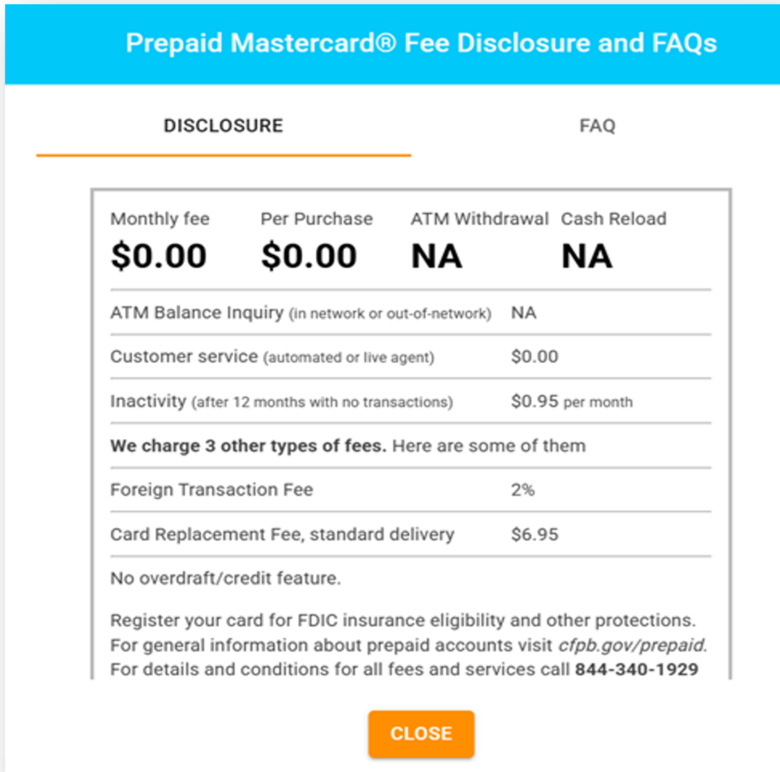
11. Upon receipt, Class Members can use their digital payment card to complete purchases wherever virtual Mastercard is accepted. Class Members also can choose to transfer the existing balance loaded to their digital payment card to another account at any time (via Zelle, ACH, Venmo, or PayPal) for no fee.

12. It is my further understanding that Class Members retain the full value of their balances at all times, apart from the potential imposition of certain fully disclosed fees and the state-law-required escheatment process described below.

13. The Settlement Website disclosed to Class Members that after a 12-month period of inactivity on a digital payment card, the digital payment card will incur inactivity service fees from the card issuer on any remaining balance until activity resumes.

14. The Settlement Website describes information relating to the prepaid Mastercard, including the following information concerning inactivity and other fees:

[4] https://www.digitaldisbursements.com/.



Prepaid Mastercard® Fee Disclosure and FAQs

DISCLOSURE FAQ

Monthly fee	Per Purchase	ATM Withdrawal	Cash Reload
$0.00	**$0.00**	**NA**	**NA**

ATM Balance Inquiry (in network or out-of-network)	NA
Customer service (automated or live agent)	$0.00
Inactivity (after 12 months with no transactions)	$0.95 per month

We charge 3 other types of fees. Here are some of them

Foreign Transaction Fee	2%
Card Replacement Fee, standard delivery	$6.95

No overdraft/credit feature.

Register your card for FDIC insurance eligibility and other protections.
For general information about prepaid accounts visit *cfpb.gov/prepaid.*
For details and conditions for all fees and services call **844-340-1929**

CLOSE

15. Class Members who receive a digital payment card can avoid inactivity service fees simply by using the value of the card at least once every twelve months or by transferring all or part of the value of the card to another account via Zelle, ACH, Venmo, or PayPal.

16. A "Card Replacement Fee" only would be incurred by Class Members who choose to request a physical card as opposed to using the virtual card provided by email. A "Foreign Transaction Fee" only would be incurred by Class Members who choose to use the card for foreign transactions.

17. It is also my understanding that any inactivity service fees charged against the balance on a dormant pre-paid digital payment card will be restored and added back to the value of the card if Blackhawk determines, through a periodic review of account activity, that the Class Member re-engages through a use of value on the card following service fee assessment. This will be done automatically by Blackhawk. This feature, in addition to those noted above, makes the pre-paid digital card offered as a payment option to Class Members more consumer-friendly than other types of payment or gift cards available on the market.

18. In any case, no portion of any inactivity or other service fee applied to any Class Member's card is paid to Angeion.

19. In certain settlements, Angeion generates revenue in connection with class settlements in addition to amounts paid from the class settlement fund.

20. Angeion may receive revenue in connection with settlements apart from payments from the settlement itself, including with respect to settlements for which Blackhawk acts as Angeion's subcontractor as the issuer of pre-paid cards to Class Members. The revenue generated by Angeion from Blackhawk does not result in any increased cost to the settlement account, does not depend on the extent to which class members in this case use or do not use their cards, and does not reduce the funds available to be distributed to Class Members in this case.

21. The timing and/or extent to which Class Members who elect the digital payment card actually use the funds on the card has no impact on Angeion's compensation from Blackhawk. In other words, Angeion's remuneration from Blackhawk is in no way dependent on Class Members using the digital payment cards they receive as part of the Settlement. Angeion intends to work with the parties to ensure that as many Class Members as possible who have elected to digital payment cards use them.

22. On October 7, 2025, Angeion updated the Settlement Website (www.clearprivacysettlement.com) by adding a Frequently Asked Question (FAQ) regarding the virtual Prepaid Mastercard. Much of information in this FAQ was previously available on the claim submission page. The FAQ explains much of the above as a simplified version of the terms and conditions, and that Angeion and Blackhawk have a contract that sets forth general terms for engagements in which Angeion subcontracts with Blackhawk to provide a pre-paid digital payment card option. Finally, the FAQ provides contact information for cardholder support (offered by

Blackhawk) should Class Members have any additional questions. A representative copy of the website's FAQ is attached here to as Exhibit A.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 28, 2025.

Jonathan P. Shaffer

Exhibit A

Brooks v. Thomson Reuters Corp.

Case No. 3:21-cv-01418

United States District Court for the Northern District of California

FAQs

Key Resources

20. Prepaid Mastercard**

**When you selected your payment option, you were given information about the details of the Prepaid Mastercard. For your convenience, we are updating the FAQs to also include this information.

Q1. What are the key terms of the Prepaid Mastercard Payment Selection?

A1.

<table>
<tr><th colspan="4">DISCLOSURE</th></tr>
<tr><td>Monthly fee</td><td>Per Purchase Fee</td><td>ATM Withdrawal</td><td>Cash Reload</td></tr>
<tr><td>$0.00</td><td>$0.00</td><td>NA</td><td>NA</td></tr>
<tr><td colspan="3">ATM Balance Inquiry (in network or out-of-network)</td><td>NA</td></tr>
<tr><td colspan="3">Customer service (automated or live agent)</td><td>$0.00</td></tr>
<tr><td colspan="4">We charge 3 other types of fees:</td></tr>
<tr><td colspan="3">Inactivity (after 12 months with no transactions)</td><td>$0.95 per month</td></tr>
<tr><td colspan="3">Foreign Transaction Fee</td><td>2%</td></tr>
<tr><td colspan="3">Card Replacement Fee, standard delivery</td><td>$6.95</td></tr>
<tr><td colspan="4">No overdraft/credit feature.

Register your card for FDIC insurance eligibility and other protections.
For general information about prepaid accounts visit cfpb.gov/prepaid.
For details and conditions for all fees and services call 844-340-1929
(toll free in USA); 682-324-9995 (outside USA) or visit www.MyPrepaidCenter.com.</td></tr>
<tr><td colspan="4">Disbursements Prepaid Mastercard Virtual Card is issued by Pathward®, N.A., Member FDIC, pursuant to license by Mastercard International Incorporated. Card is serviced by Blackhawk Network.</td></tr>
<tr><td colspan="4">Mastercard and the circles design are registered trademarks of Mastercard International Incorporated. Card has no cash access and cannot be used for recurring payments. Can be used where Debit Mastercard is accepted for online, phone/mail orders, or in stores that accept mobile wallet. Valid for up to 12 months. Funds do not expire and may be available after the expiration date, inactivity fee may apply. Terms and conditions apply.</td></tr>
</table>

Q: How do I activate my Virtual Prepaid Mastercard?

A: You can activate your Virtual Prepaid Mastercard by clicking on the link in your notification email.

Q: Can I transfer funds to my bank account?

A: Yes, You can transfer your remaining card balance to your bank account at no charge.

Q: Who runs the Prepaid Mastercard, and who do I contact if I have more questions about the card terms?

A: The Prepaid Mastercard is issued by Pathward® and serviced by Blackhawk Engagement Solutions. Angeion (the settlement administrator in this case) and Blackhawk have a contract that sets forth general terms for engagements in which Angeion subcontracts with Blackhawk to provide a pre-paid digital payment card option. Angeion receives income from Blackhawk when Blackhawk issues a pre-paid card to a Class Member. The income Angeion receives from Blackhawk will not diminish or otherwise impact any of the Settlement proceeds available for, or distributed to Class Members in this case.

If you have questions about the terms of your Prepaid Mastercard, you may reach Blackhawk's cardholder support at **1-844-340-1929**.