



Comments Received by the Department of
Consumer and Worker Protection on
Proposed Rules related to Local Law 3 and the use of
Biometric Identifier Information

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Legislative Affairs
One Whitehall Street
New York, NY 10004
212-607-3300 www.nyclu.org

Testimony of Daniel Schwarz
On Behalf of the New York Civil Liberties Union
Before the New York City Department of Consumer and Worker Protection
Regarding the new rules to implement Local Law 3 of 2021

August 30, 2021

The New York Civil Liberties Union (“NYCLU”) respectfully submits the following testimony regarding the new rules to implement Local Law 3 of 2021. The NYCLU, the New York affiliate of the American Civil Liberties Union, is a not-for-profit, non-partisan organization with eight offices throughout the state and more than 180,000 members and supporters. The NYCLU’s mission is to defend and promote the fundamental principles, rights, and values embodied in the Bill of Rights, the U.S. Constitution, and the Constitution of the State of New York. The NYCLU works to expand the right to privacy, increase the control individuals have over their personal information, and ensure civil liberties are enhanced rather than compromised by technological innovation.

Biometric surveillance technologies, which include face, voice, and gait recognition, enable the invasive power to track who we are, where we go, and who we meet. But they are also highly flawed and rely on racially-biased systems. The widespread use of these technologies presents a clear danger to all New Yorkers' civil liberties and threatens to erode our fundamental rights to privacy, protest, and equal treatment under the law.

In recognition of these harms, the New York City Council enacted Local Law 3 of 2021 (“LL 3”) as a first step to diagnose the spread and use of these surveillance technologies in businesses. The law, which came into effect on July 9, 2021, takes a rudimentary approach to biometric surveillance technology, requiring certain “commercial establishments” that collect, use, or retain “biometric identifier information” from their customers to post notices at all customer entrances in a form prescribed by the New York City Department of Consumer and Worker Protection (“DCWP” or “Department”). In order for this law to not just be a mere rubber stamp on the use of biometric surveillance, it is incumbent on the Department to promulgate rules that, at the very least, give the public basic information about the technologies in use and any privacy policies that govern them.

Unfortunately, the proposed rules by the DCWP fall far short of that goal. The rules as drafted would not disclose any meaningful information and fail to notify customers in plain and simple language about the use and implications of biometric surveillance technologies.

The DCWP published a Biometric Identifier Information Disclosure sign template¹ on its website, which businesses simply have to add their names to and post at every entrance to

fulfill the notice requirement. The 35-word notice is so ambiguous that it actively obscures any information value whatsoever from the disclosure. It lacks any specificity about the type of biometric data collection occurring, and does not include privacy policies covering the use, access, retention, deletion, sharing, and security measures governing that data – or where to find them. Further, the sign template lists only two examples of biometric identifier information: eye scans and voiceprints. Notably absent is any mention of facial recognition, which is the most prominent and newsworthy type of biometric data collection – and was the primary target of the Council in passing the underlying legislation. This focus on facial recognition can be seen in the legislative history, including in LL3/Intro. 1170-2018’s summary, Committee reports, and minutes of the Council’s Stated Meeting. Deliberately excluding the most widely known type of biometric identifier thwarts transparency and weakens the notice’s potential impact. It’s also critical that businesses clearly disclose the specific types of biometric data collection they deploy, particularly as these technologies are notoriously inaccurate and racially biased. Numerous studies have shown that face surveillance technologies are particularly inaccurate for women and people of color.² And misidentifications have led to harassments, removals from establishments, arrests, and jail time.³

It has been practically impossible to find out whether businesses deploy biometric recognition technologies. In 2018, the ACLU asked some of the biggest retailers whether they

¹ Sign template, Biometric Identifier Information Disclosure, <https://www1.nyc.gov/assets/dca/downloads/pdf/businesses/Biometric-Identifier-InformationDisclosure-Sign.pdf>.

² See e.g., Cynthia M. Cook et al., *Demographic Effects in Facial Recognition and their Dependence on Image Acquisition: An Evaluation of Eleven Commercial Systems*, 1 IEEE

TRANSACTIONS ON BIOMETRICS, BEHAVIOR, AND IDENTITY SCIENCE 32–41 (2019); Joy

Buolamwini & Timnit Gebru, *Gender Shades: Intersectional Accuracy Disparities in Commercial Gender Classification*, PROCEEDINGS OF MACHINE LEARNING RESEARCH (2018), <http://proceedings.mlr.press/v81/buolamwini18a/buolamwini18a.pdf>.

³ See e.g., Dave Gershgor, *Black teen barred from skating rink by inaccurate facial recognition*, THE VERGE (2021), <https://www.theverge.com/2021/7/15/22578801/black-teenskiating-rink-inaccurate-facial-recognition> (last visited Aug 20, 2021); Kashmir Hill, *Another*

Arrest, and Jail Time, Due to a Bad Facial Recognition Match, THE NEW YORK TIMES, December 29, 2020, <https://www.nytimes.com/2020/12/29/technology/facial-recognitionmisidentify-jail.html> (last visited Aug 20, 2021); *The Computer Got it Wrong: Why We’re Taking the Detroit Police to Court Over a Faulty Face Recognition “Match,”* AMERICAN CIVIL LIBERTIES UNION, <https://www.aclu.org/news/privacy-technology/the-computer-got-it-wrongwhy-were-taking-the-detroit-police-to-court-over-a-faulty-face-recognition-match/> (last visited May 20, 2021).

use facial recognition: of nineteen retailers, only two answered.¹ In contrast to this, people clearly want transparency and control over their data: a recent survey shows that

¹ Jenna Bitar & Jay Stanley, *Are Stores You Shop at Secretly Using Face Recognition on You?*, AMERICAN CIVIL LIBERTIES UNION (2018), <https://www.aclu.org/blog/privacytechnology/surveillance-technologies/are-stores-you-shop-secretly-using-face> (last visited Aug 20, 2021).

69% of Americans believe that stores should inform customers about the use of facial recognition and 65% would want to have the choice to opt-out.² This becomes ever-more important as corporate and retail surveillance expand and allow for further data collection, correlation, and analysis, e.g. by combining someone’s biometric data with other information such as their credit card, smartphone (through WiFi, Bluetooth, or other identifiers), customer loyalty card, other NFC-enabled devices, or even online activities.

The mere collection and storage of biometric information can also be harmful and lead to unforeseen consequences. Any database of sensitive information is vulnerable to hacking and misuse. Unlike a password or credit card number, biometric data cannot be changed if there is a security breach. And what we have witnessed so far should inspire little confidence in many companies’ ability to adequately guard against misuse.³ Disclosing data policies and creating appropriate security mechanisms should be the baseline for anyone handling biometric data.

The DCWP proposed rules also give more leeway to businesses for the place of posting the sign than, for example, restaurants have for the posting of letter grade cards. Restaurants are required to post letter grade cards in a “conspicuous place where it is visible to passersby [...] on the front window, door or exterior wall [...] within five feet of the front door or other opening to the establishment where customers enter from the street, at a vertical height no less than four feet and no more than six feet from the ground or floor.”⁷ Additionally, letter grade cards have a much higher visibility and recognizability, given their colorful, conspicuous, large design elements; all qualities lacking in the Biometric Identifier Disclosure template sign, which is likely to not attract much attention and is designed to blend in.

Let’s be clear; a sign is not a sufficient tool to reign in on facial recognition and other biometric surveillance tools by businesses. There’s no substitute for individual, informed opt-in consent. But in the absence of other protections at the local, state, and federal level, the rules

for the implementation of LL3 need to be tailored towards giving people the information they need to make an informed choice about the stores they frequent.

In conclusion, the NYCLU thanks the Department of Consumer and Worker Protection for the opportunity to provide testimony. The Department’s rulemaking is instrumental in ensuring a productive implementation of Local Law 3. We urge the Department to amend and strengthen the proposed rules to require businesses to disclose the types of biometric recognition technologies and their privacy policies – and do so in a way that will be

² Face-recognition tech in retail Are Americans prepared for it?, PIPLSAY (2021), <https://piplsay.com/face-recognition-tech-in-retail-are-americans-prepared-for-it/> (last visited Aug 16, 2021).

³ See, e.g.: Patrick Howell O’Neill, *Data leak exposes unchangeable biometric data of over 1 million people*, MIT TECHNOLOGY REVIEW (2019), <https://www.technologyreview.com/2019/08/14/133723/data-leak-exposes-unchangeablebiometric-data-of-over-1-million-people/> (last visited Aug 20, 2021), Josh Taylor, *Major breach found in biometrics system used by banks, UK police and defence firms*, THE GUARDIAN (2019), <http://www.theguardian.com/technology/2019/aug/14/major-breach-found-in-biometricssystem-used-by-banks-uk-police-and-defence-firms> (last visited Aug 20, 2021). ⁷ Rules of NYC, Title 24, § 23-07 Posting letter grades. (7) f.

clearly noticeable and recognizable by passersby. Without meaningful levels of detail and specificity, the rules risk to desensitize people to the sign and normalize pernicious data collection in the everyday lives of New Yorkers.



40 Rector Street, 9th Floor
New York, New York 10006
www.StopSpying.org | (646) 602-5600

**STATEMENT OF
MAHIMA ARYA
COMPUTER SCIENCE FELLOW
SURVEILLANCE TECHNOLOGY OVERSIGHT PROJECT**

**BEFORE THE
DEPARTMENT OF CONSUMER AND WORKER PROTECTION**

**FOR A HEARING CONCERNING
RULES TO IMPLEMENT LOCAL LAW 3 OF 2021**

**PRESENTED
August 30, 2021**

Good morning, my name is Mahima Arya, and I am a Computer Science Fellow at the Surveillance Technology Oversight Project (“S.T.O.P.”), a New York-based privacy and civil rights group. Thank you for the opportunity to testify today about DCWP’s proposed rule in furtherance of Local Law 3 of 2021 (the “Proposed Rule”). While I commend the Department for moving forward with this process under trying conditions, the current draft of the Proposed Rule is manifestly incompatible with the purpose and intended impact of Local Law 3.

The New York City Council and Mayor enacted Local Law 3 in the hopes of addressing the unprecedented privacy and safety risks posed by biometric tracking tools. Systems like facial recognition, iris scans, and gait detection can transform our own bodies into tracking devices for store owners. Even worse, these biased systems often are more error-prone for Black and Latinx New Yorkers, putting them at heightened risk of profiling by stores and even false arrest by police.

Store owners increasingly rely on automated surveillance systems to alert police to suspected shoplifters and other customers who are barred from the premises. Biometric tracking puts BIPOC New Yorkers at risk, fueling dangerous police encounters that are sparked simply by the color of a customer’s face. Not only can these systems facilitate segregation of places of public accommodation (in violation of New York City Human Rights Laws), not only do they violate customers’ privacy, but they can increase the risks of police violence.

In passing Local Law 3, the New York City Council sought to provide public notice on a scale commensurate with biometric tracking’s risk. While S.T.O.P. urges the Council and DCWP to go further, banning all biometric surveillance in stores, we recognize that public notice is an important first step to an eventual ban on the technology. Sadly, rather than enabling Local Law 3, the Proposed Rule would eviscerate its intended impact, making compliance an empty gesture that is all but guaranteed to hide (not show) how customers’ bodies are being tracked.

A. DCWP’s Proposed Design Will Make Meaningful Implementation Impossible

When New Yorkers enter a store, they are faced with an array of ads, merchandise, and government-mandated signage, all competing for their attention. In this visually crowded space, which can include information on everything from health codes, energy usage, COVID-19 protocols, and more, the Proposed rule would add a single sheet of white letter-sized paper with black text posted in a “clear and conspicuous manner.” To be frank, there is perhaps no form of signage that could be more inconspicuous.

Such a small signage and typography is all-but-guaranteed to let this sign fade into the visual background. Rather than serving as a crucial, first-in-the-country effort to educate the public about biometric tracking, the sign would become a formality that goes completely unobserved to all but the most eagle-eyed inspector. Even worse, the model warning provided by the Department uses single-spaced Arial, a sans-serif font that will be even less attention-grabbing than a wide array of freely available alternative.

At a minimum, the size of the warning poster must be increased to at least 11 inches by 17 inches, although a full poster size of 24 inches by 36 inches would be even better aligned with the legislative intent of Local Law 3. The poster must include the word “warning” in red text, against a white background, in no less than 100-point font on the poster’s top line. We also suggest incorporating a yellow caution sign as part of the design as well. The body of the poster should be in at least 36point font. Lastly, the Department should provide stock images for store owners to use in representing each type of biometric tracking, including facial recognition, iris scans, and fingerprint readers. Adding a graphical representation of each tracking system is not only indispensable as a way to draw customers’ attention to the sign, but it’s also an essential accessibility measure for staff and customers who do not readily communicate in English.

DCWP has a tremendous opportunity to inform, empower, and protect New York’s customers and workers, but only if you act. If the Department updates the Proposed Rule to incorporate basic design and communications principles and ensure that New Yorkers receive proper notice about biometric tracking, you will help transform New York City into a leader in biometric transparency. Alarming, if the Department finalizes the Proposed Rule as currently drafted, you will undermine the City Council’s intent and further help normalize biometric surveillance technology, directly undermining the goal you were tasked with accomplishing. I hope that you will adjust course in light of this feedback and do what is needed to protect New Yorkers.

NEW YORK CITY
DEPARTMENT OF CONSUMER AND WORKER PROTECTION

PUBLIC HEARING ON THE PROPOSED RULES
TO IMPLEMENT LOCAL LAW 3 OF 2021

Virtual Public Hearing

August 30, 2021

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New York Civil Liberties Union	

1 MR. CHARLIE DRIVER: Hi, everyone. Thanks for -- thanks
2 for tuning in, and joining. My name is Charlie. I am part of the DCWP External
3 Affairs staff, and will be sort of taking us through this, this hearing today.
4 Albert, I have you top of my list for, for testifying once we get going. If there's
5 anyone else on here who is looking to offer testimony at this -- at this hearing,
6 please, you can either unmute and tell me. You can also feel free to just shoot
7 me a message in the chat, and I'll make sure that you're on, on my list to go.

8 And just had a quick question. How long can we speak for?
9 Basically, we do -- three minutes is the timeline for testimony. I'm not going to
10 be super aggressive about this, or if you -- you're just wrapping up at the three-
11 minute mark, you know, I'll let you go over a little. If you want -- if you have
12 written 10 pages of testimony that you want to offer, you're not going to get the
13 chance to do all of those here.

14 But I will drop my e-mail in the chat and you can always e-mail
15 me written testimony that we can also incorporate into the record. And so that,
16 that goes if you want to offer your written testimony in addition to the oral
17 today. But I'd ask you also get that in today, just because we're at the end of the
18 comments period. But yes, Daniel, you are now number 2 on my list. My e-
19 mail is now in the chat.

20 Alright, so we're going to -- we're going to

21 just get this officially started and then we'll go into the testimony. Again, if you
22 haven't let me know that you want to testify and you change your mind, just
23 drop me a line in the chat and I will be able to take care of that.

24 So, good morning, my name is Charlie Driver. I've been
25 designated as the hearing officer for the public hearing of the Department of
26 Consumer and Worker Protection on the proposed rules to implement Local Law
27 3 of 2021. This hearing is being held by teleconference call. It is now 11:04
28 a.m. on Monday, August 30th. And I am hereby convening the public hearing
29 on this proposed rule.

30 This proposed rule was published in the City Record on July 29,
31 2021. Published notice and rules are available online on the New York City
32 Rules website and the Department of Consumer and Worker Protection's
33 website. The department has proposed these rules pursuant to the authority
34 vested in the Commissioner of the Department of Consumer and Worker
35 Protection via Sections 1043 and 2203-F of the New
36 York City Charter and Sections 22-1202 of Title 22 of the New York City
37 Administrative Code.

38 This hearing affords the public the opportunity to comment on
39 all aspects of the rules the department has proposed. The department
40 will carefully review all testimony and written comments received at
41 this hearing and will give due weight and consideration to proposals
42 and recommendations that are submitted for the record at this hearing.

43 Once again, just to -- just to go over this. So during the hearing,
44 please, give due respect and consideration to anyone who's offering their
45 testimony and make sure that you're muting yourself on the Zoom if you're not
46 speaking. In terms of the order for testimony, I'll be keeping that. I have two of
47 you right now on the order. I will announce you beforehand, and just let me
48 know if there are additional people in the call who want to testify.

49 Everyone will have a maximum of three minutes to provide oral
50 testimony. If it's going to take longer than three minutes, please,
51 synthesize your oral testimony and feel free to leave a written copy of
52 whatever you didn't get to, as well as what you said, for the record. And
53 then again, there is no time limit for written testimony. You can submit
54 as many pages as you want, and we will make that as well part of the
55 public record. Now, once again, just one final reminder to mute your
56 lines until you're called. And we can now get this started. So I will call
57 first Albert Fox Cahn to offer, offer testimony on this proposed rule.

58 MR. ALBERT FOX CAHN: Good morning. My name

59 is Albert Fox Cahn. I'm the Executive Director of the Surveillance Technology
60 Oversight Project. I'm also a visiting fellow at Yale Law School's Information
61 Society Project and at New York University School of Law's Information Law
62 Institute. This is an excerpt of the longer comment submitted for the record.

63 And I, I just want to express, to begin with, that biometric surveillance
64 isn't just invasion of privacy. It's not something that is only fueling
65 discrimination. It is a threat to the safety of New Yorkers. These biased and
66 broken systems are oftentimes being used to call police to arrest customer simply
67 for shopping while black. Simply for showing their face in a store that is using a
68 broken system that discriminates against communities of color, as facial
69 recognition so often does. And novel forms of biometric surveillance pose an
70 even greater risk to the public, because there is even less known about how they
71 operate and how data is collected.

72 The proposed rules that had been put forward by the department
73 are manifestly insufficient. They are completely at odds with the purpose of
74 Local Law 3, and more is needed. An 8-1/2 x 11 sheet of paper with black and
75 white text is not noticed. It is something to go unnoticed. It is something
76 designed to blend into the background, not to stand out as a warning. What we
77 need is a much larger poster, at a minimum 11 x 17, but more likely 24 x 36
78 inches.

79 We need a bright bold red warning explicitly at the top of this
80 poster stating, "Warning" that biometric surveillance is being used. We need
81 visual indicators of the technologies being used for nonEnglish speaking
82 customers. Currently, this poster is only available in English, but why can't we
83 have a visual representation of each biometric tracking tool being used, such as a

84 symbol of a face being analyzed by facial recognition. Such as a depiction of
85 gait detection or iris scans.

86 We need graphical representations not just to make these posters
87 accessible, but again to grab attention. When you are walking through the
88 entrance of a business in New York, there are dozens of different posters and
89 warnings, and other -- and ads that are vying for your attention. And if we put
90 forward this regulation as proposed, if we implement Local Law 3 as the
91 department is attempting to, we will not put New Yorkers on notice about the
92 ways they are being tracked, we will only further normalize this deeply, deeply,
93 deeply dangerous technology. I urge the department to do better, and I urge it to
94 adopt far larger, far more prominent poster requirements.

95 MR. DRIVER: Alright, thank you. Thank you very much for
96 your testimony. We'll incorporate that into the record, and thank you for
97 keeping it under the time limit. I really appreciate you taking time for this. Next
98 up, and he's, he's come off -- come onto camera, and for the recognition of that is
99 Daniel Schwarz from the NYCLU. Daniel, you have three minutes. I'll give
100 you a 30-second warning in the chat.

101 MR. DANIEL SCHWARZ: Thank you, Charlie. And yeah, my
102 name is Daniel Schwarz. I'm here to testify on behalf of the New York Civil
103 Liberties Union. We thank the department for this hearing and for the
104 opportunity to provide testimony today. In order for this law to not just be a
105 mere rubber stamp on the use of biometric surveillance, it is incumbent on a
106 department to promulgate rules that, at the very least, give the public basic
107 information about the technologies in use, and any privacy policies that govern
108 them.

109 Unfortunately, the proposed rules by the DCWP fall far short of
110 that goal. The rules, as drafted, would not disclose any meaningful information
111 and fail to notify customers in plain and simple language about the use
112 implications of biometric surveillance technologies. The department published a
113 biometric identifier disclosure sign template on its website, which businesses
114 simply have to add their names to, and post at every entrance to fulfill this notice
115 requirement.

116 This 35-word notice is so ambiguous that it actively obscures any
117 information value whatsoever from the disclosure. It lacks any specificity about
118 the type of biometric data collection occurring, and does not include privacy
119 policies covering the use, access, retention, deletion, sharing, and security
120 measures governing that data or where to find them. Throughout the design
121 template lists only two examples of biometric identifier information, eye scans
122 and voiceprints. Notably absent is any mention of facial recognition, which is
123 the most prominent type of biometric data collection and which was also the

124 primary target of the council in passing the underlying legislation, which can be
125 clearly seen in its legislative history, the committee reports, and the stated
126 meeting-, stated meeting minutes. Deliberately excluding the most widely
127 known type of biometric identifier thwarts transparency and weakens the
128 notice's potential impact.

129 It's also critical that businesses clearly

130 disclose the specific types of biometric data collection they deploy, particularly
131 as these technologies are notoriously inaccurate and racially biased. Numerous
132 studies have shown that face surveillance technologies are particularly
133 inaccurate for women and people of color. And misidentifications have led to
134 harassments, removals from establishments, arrests, and jail time.

135 It's been practically impossible to find out

136 whether businesses deploy biometric recognition technologies. In 2018, the
137 ACLU asked some of the biggest retailers whether they use facial recognition.
138 Of 19 retailers, only two answered. In contrast to this, people clearly want
139 transparency and control over their data. A recent survey shows that 69% of
140 Americans believe that stores should inform customers about the use of facial
141 recognition, and 65% would
142 want to have the choice to opt out.

143 Now, let's be clear. Thank you, Charlie. A sign is not a sufficient
144 tool to reign in on facial recognition and other biometric surveillance tools by
145 businesses. There's no substitute for individual informed opt-in consent. But in
146 the absence of other protections at the local, state, and federal level, the rules for
147 the implementation of Local Law 3 needs to be tailored towards giving people
148 information they need to make an informed choice about the stores they
149 frequent.

150 We urge the department to amend and strengthen the proposed
151 rules to require businesses to disclose the types of biometric recognition
152 technologies and their respective privacy policy. And do so in a way that will be
153 clearly noticeable and recognizable by passersby. Without meaningful levels of
154 detail and specificity, the rules risk to desensitize people to the sign, and
155 normalize pernicious data collection in the everyday lives of New Yorkers. We
156 submitted our full testimony online and again thank the department for the
157 ability to provide comment. Thank you.

158 MR. DRIVER: Okay. Thank you so much, and thank you for
159 also submitting that full testimony online. At this time, we do not have any, any
160 other interested parties here to testify. With that in mind, I will adjourn this
161 hearing until someone else appears to offer testimony or until 12:00 p.m.,
162 whichever comes first.

163 Basically, what that means is that the Zoom room is going to stay
164 open. It'll be dormant in the event that someone else comes in and wants to offer
165 testimony. I'll unmute myself. I'll announce it. I'll give everyone a little time if
166 they're interested in staying on in the possibility of that, and then we'll proceed

167 with that testimony when it comes. Alright, thank you to everyone, and
168 potentially talk soon. Otherwise, the Zoom room will close at noon.
169 MR. CAHN: Thank you, Charlie.

170 [OFF THE RECORD] [00:12:58]

171 [ON THE RECORD] [00:42:45]

172 MR. DRIVER: Hi, Melissa [phonetic], welcome, welcome to this
173 hearing.

174 MS. MELISSA: Thank you.

175 MR. DRIVER: Are you, are you interested in offering testimony
176 today?

177 MS. MELISSA: No, not, not at this time.

178 I'm just listening in.

179 MR. DRIVER: Okay. So we're just -- we had
180 two people who offered testimony at the beginning of the hearing. And right
181 now, we're waiting to see if anyone else comes through interested in offering
182 their testimony. And otherwise, the hearing will wrap up at noon.

183 MS. MELISSA: Okay. Sounds good, thank you.

184 [OFF THE RECORD] [00:43:15]

185 [ON THE RECORD] [00:58:45]

186 MR. DRIVER: Well, it's now -- it's now noon, so we're going to
187 wrap this hearing up. We haven't had anyone else register interest in testifying,
188 or come through hoping to testify. Thank you for, for attending and listening,
189 and we'll see you at the next one.

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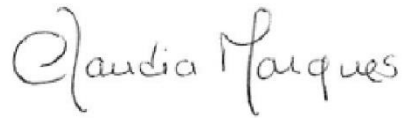
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CERTIFICATE OF ACCURACY

I, Claudia Marques, certify that the foregoing transcript of Public Hearing on the Proposed Rules to implement Local Law 3 of 2021 on August 30, 2021 was prepared using the required transcription equipment and is a true and accurate record of the proceedings.

Certified By



Claudia Marques

Date: November 1, 2021

GENEVAWORLDWIDE, INC
256 West 38th Street - 10th Floor
New York, NY 10018

Geneva Worldwide, Inc.
256 West 38th Street, 10th Floor, New York, NY 10018