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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TSR LLC,

Plaintiff,

v.

WIZARDS OF THE COAST LLC,

Defendant.

No. 2:21-cv-01705-SKV

DECLARATION OF ELIZABETH  
M. SCHUH IN SUPPORT OF  
WIZARD OF THE COAST LLC'S  
MOTION FOR A PRELIMINARY  
INJUNCTION

WIZARDS OF THE COAST LLC,

Counterclaim Plaintiff,

v.

TSR LLC; JUSTIN LANASA; and DUNGEON  
HOBBY SHOP MUSEUM LLC,

Counterclaim Defendants.

I, Elizabeth M. Schuh declare as follows:

1. I have been employed by Wizards of the Coast LLC (“Wizards”) since 1995. My current role is Director of Publishing and Licensing, Dungeons & Dragons, where I am responsible for managing the Dungeons & Dragons brand through the publication of new products and the licensing of previous releases. I have personal knowledge of the facts in this declaration or have acquired this knowledge through my review of records kept in the regular

1 course of business. I am over the age of 18 and competent to testify to the matters stated in this  
2 declaration. The statements made below are true to the best of my knowledge and belief.

3 2. In 1997, Wizards purchased TSR, Inc., the company that created, published, and  
4 distributed Dungeons & Dragons—the original tabletop role playing game (RPG) that has been  
5 enjoyed by millions of players since 1974. TSR, Inc. owned the rights to and produced,  
6 advertised, and sold other product lines, including a line of games called Star Frontiers. Wizards  
7 considers Star Frontiers part of the Dungeons & Dragons family of RPGs.

8 3. When Wizards acquired TSR, Inc., it acquired all of TSR, Inc.’s intellectual  
9 property, including trademarks in the terms “TSR” and “Star Frontiers.” TSR, Inc. formally  
10 assigned its U.S. trademark registrations to Wizards, in an assignment recorded with the United  
11 States Patent and Trademark Office on December 6, 2000. TSR, Inc. first registered the TSR  
12 Mark first under Reg. No. 1242708 and the Star Frontiers Mark under Reg. No. 1245487, through  
13 applications in 1982.

14 4. Wizards has continued to this day to use the marks it acquired through its  
15 acquisition of TSR, Inc. Dungeons & Dragons, for example, is one of Wizards’ most prominent  
16 and well-recognized brands.

17 5. The “TSR” mark (the “TSR Mark”) is a word mark consisting of the letters  
18 “TSR”—the business name of the original creator of Dungeons & Dragons and an acronym  
19 standing for “Tactical Studies Rules.” “Tactical Studies Rules” is not a term that has meaning  
20 aside from the business name. Since acquiring TSR, Inc., Wizards continues to use the TSR  
21 Mark originally created and used by its predecessor in interest.

22 6. Wizards has licensed the TSR Mark and the Star Frontiers word mark (the “Star  
23 Frontiers Mark”) (collectively, the “Marks”) to OneBookShelf, Inc., which sells older editions  
24 of Dungeons & Dragons products bearing the TSR Mark and the Star Frontiers Mark.

25 7. OneBookShelf has sold products bearing the TSR Mark continuously since at  
26 least as early as December 2012. Over the past decade, OneBookShelf has sold hundreds of  
27

1 thousands of products bearing the TSR Mark and advertises such products online and through  
2 social media.

3 8. OneBookShelf has sold products bearing the Star Frontier Mark continuously  
4 since at least as early as December 2012. Over the past decade, OneBookShelf has sold  
5 thousands of products bearing the Star Frontiers Mark and advertises such products online and  
6 through social media.

7 9. Wizards and its licensees invest heavily in marketing and promoting RPG  
8 products including Star Frontiers. For instance, earlier this year, Wizards' parent company  
9 Hasbro, Inc. acquired D&D Beyond, the leading digital RPG toolset and Dungeons & Dragons  
10 game companion. This acquisition will expand Wizards' RPG offerings, enabling online play  
11 and enhancing player experiences. Attached as **Exhibit A** is a true and correct copy of Hasbro's  
12 press release announcing the completed acquisition.

13 10. From when this case was filed until the end of July 2022, Wizards believed TSR  
14 LLC was not actually selling or distributing games bearing the Marks.

15 11. Wizards is deeply concerned about TSR LLC's Star Frontiers New Genesis  
16 product because of its racist, transphobic, and other offensive content. Such a product directly  
17 conflicts with Wizards' commitment to diversity and inclusivity in the gaming community.

18 12. Wizards has long embraced an inclusive culture for gaming, including for its  
19 Dungeons & Dragons products. Consistent with this philosophy, in June 2020, Wizards  
20 published a post on its website detailing some of its efforts to ensure its Dungeons & Dragons  
21 products reflect Wizards' values around diversity. In this post, Wizards stated it is updating its  
22 descriptions of characters when reprinting older Dungeons & Dragons products to remove  
23 racially insensitive material. Wizards also explained that it is increasing its use of sensitivity  
24 readers and diversity experts in its creative process to ensure that its storytelling reflects its  
25 values. Attached as **Exhibit B** is a true and correct copy of this public post.

26 13. Wizards also alerts players to changes it makes to better foster inclusive gaming.  
27 For new character races in Dungeons & Dragons games, Wizards no longer associates particular

1 character races with certain physical characteristics and instead acknowledges a range of physical  
2 characteristics for character races. Attached as **Exhibit C** is a true and correct copy of a public  
3 post explaining new “creature evolutions.”

4 14. As recently as this month, Wizards released a statement recognizing problematic  
5 content within its newest campaign, which contained content adapted from a 1982 version of a  
6 game. This illustrates Wizards’ commitment to diversity and to publishing inclusive products.  
7 Attached as **Exhibit D** is a true and correct copy of this statement.

8 15. The gaming community, through press and player forums, has noted Wizards’  
9 efforts. Attached as **Exhibit E** is a true and correct copy of a sampling of public documents from  
10 the media recognizing Wizards’ efforts to promote diversity.

11 16. Tabletop RPG is a growing market, as players look to reconnect with friends in  
12 person and online. Wizards considers it to be among its most important product lines.

13 17. Tabletop RPGs are social by design. Players gather with friends to engage in  
14 group storytelling, often using a single book or set of books, and it is not unusual for a group  
15 playing together to have members with more and less experience. This means consumers may  
16 experience Star Frontiers New Genesis without having purchased it directly—for example at a  
17 friend’s house or other gathering in a group of players.

18 18. Wizards embraces new players and hopes to encourage their interest in its games.  
19 But some consumers may first encounter RPG, or Dungeons & Dragons, through Star Frontiers  
20 New Genesis and mistakenly attribute it to Wizards. In addition, not all consumers will be  
21 dedicated gamers; some will be especially prone to mistaking the Star Frontiers New Genesis  
22 product for one of Wizards’—and assuming that Wizards has published and distributed the  
23 offensive racist content in that game.

24 19. Having consumers mistakenly attribute Star Frontiers New Genesis to Wizards  
25 will sully Wizards’ reputation and harm its efforts to promote inclusivity in gaming.  
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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 8th day of September, 2022, at Seattle, Washington.

Elizabeth M. Schuh  
\_\_\_\_\_  
Elizabeth M. Schuh

# EXHIBIT A



## Hasbro Completes Acquisition of D&D Beyond from Fandom

May 19, 2022

*Strategic, complementary acquisition accelerates direct-to-fans capability to drive unified vision for Dungeons & Dragons brand in physical and digital play*

PAWTUCKET, R.I.--(BUSINESS WIRE)--May 19, 2022-- Hasbro, Inc. (NASDAQ: HAS) today announced the completion of its previously announced acquisition of D&D Beyond, the leading digital RPG toolset and game companion to the iconic fantasy franchise, DUNGEONS & DRAGONS. Fandom, the world's largest fan platform, previously owned and operated D&D Beyond since 2019 and has grown the direct-to-consumer business to be the leading role-playing game (RPG) digital toolset on the market with close to 10 million registered users.

Driven by a shared vision to build the best possible player-centric experiences for the world's greatest role-playing game, the acquisition of D&D Beyond will further accelerate Wizards of the Coast's capabilities to strengthen their unique ecosystem of world-class tabletop and digital play to create deeper player engagement and satisfaction and support growth across all expressions and regions.

To celebrate today's closing, D&D Beyond will unlock the beloved starter adventure, *Lost Mine of Phandelver* for all new and existing registered users, and between May 19 and 26, registered users can redeem a copy of *Acquisitions Incorporated*, a campaign book that introduces new character options and setting to DUNGEONS & DRAGONS.

### **About Hasbro**

Hasbro (NASDAQ: HAS) is a global play and entertainment company committed to making the world a better place for all children, fans and families. Hasbro delivers immersive brand experiences for global audiences through consumer products, including toys and games; entertainment through eOne, its independent studio; and gaming, led by the team at Wizards of the Coast, an award-winning developer of tabletop and digital games best known for fantasy franchises MAGIC: THE GATHERING and DUNGEONS & DRAGONS.

The Company's unparalleled portfolio of approximately 1,500 brands includes MAGIC: THE GATHERING, NERF, MY LITTLE PONY, TRANSFORMERS, PLAY-DOH, MONOPOLY, BABY ALIVE, DUNGEONS & DRAGONS, POWER RANGERS, PEPPA PIG and PJ MASKS, as well as premier partner brands. For the past decade, Hasbro has been consistently recognized for its corporate citizenship, including being named one of the 100 Best Corporate Citizens by 3BL Media and one of the World's Most Ethical Companies by Ethisphere Institute. Important business and brand updates are routinely shared on our Investor Relations website, Newsroom and social channels (@Hasbro on Twitter, Instagram, Facebook and LinkedIn.)

### **Forward-Looking Statements**

This press release contains "forward-looking statements" within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements may be accompanied by such words as "anticipate," "believe," "could," "estimate," "expect," "forecast," "intend," "may," "plan," "potential," "project," "target," "will" and other words and terms of similar meaning. Among other things, these forward-looking statements may include statements concerning: the benefits of the transaction; and the ability to achieve our financial and business goals and objectives. The Company's actual actions or results may differ materially from those expected or anticipated in the forward-looking statements due to both known and unknown risks and uncertainties. Specific factors that might cause such a difference include, but are not limited to: risks of unexpected costs, liabilities or delays; integration difficulties, including the ability to retain key personnel; and other factors that may impact or alter Hasbro's anticipated business plans, strategies and objectives; and other risks detailed from time to time in Hasbro's filings with the U.S. Securities and Exchange Commission (the "SEC"). The statements contained herein are based on the Company's current beliefs and expectations and speak only as of the date of this press release. Except as may be required by law, the Company does not undertake any obligation to make any revisions to the forward-looking statements contained in this press release or to update them to reflect events or circumstances occurring after the date of this press release. You should not place undue reliance on forward-looking statements.

HAS-WIZ

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# EXHIBIT B



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## Wizards of the Coast

*June 17th 2020*

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*Dungeons & Dragons* teaches that diversity is strength, for only a diverse group of adventurers can overcome the many challenges a D&D story presents. In that spirit, making D&D as welcoming and inclusive as possible has moved to the forefront of our priorities over the last six years.

We'd like to share with you what we've been doing, and what we plan to do in the future to address legacy D&D content that does not reflect who we are today. We recognize that doing this isn't about getting to a place where we can rest on our laurels but continuing to head in the right direction. We feel that being transparent about it is the best way to let our community help us to continue to calibrate our efforts.

One of the explicit design goals of 5th edition D&D is to depict humanity in all its beautiful diversity by depicting characters who represent an array of ethnicities, gender identities, sexual orientations, and beliefs. We want everyone to feel at home around the game table and to see positive reflections of themselves within our products. "Human" in D&D means *everyone*, not just fantasy versions of northern Europeans, and the D&D community is now more diverse than it's ever been.

Throughout the 50-year history of D&D, some of the peoples in the game— orcs and drow being two of the prime examples—have been characterized as monstrous and evil, using descriptions that are painfully reminiscent of how real-world ethnic groups have been and continue to be denigrated. That's just not right, and it's not something we believe in. Despite our conscious efforts to the contrary, we have allowed some of those old descriptions to reappear in the game. We recognize that to live our values, we have to do an even better job in handling these issues. If we make mistakes, our priority is to make things right.

Here's what we're doing to improve:

- We present orcs and drow in a new light in two of our most recent books, *Eberron: Rising from the Last War* and *Explorer's Guide to Wildemount*. In those books, orcs and drow are just as morally and culturally complex as other peoples. We will continue that approach in future books, portraying all the peoples of D&D in relatable ways and making it clear that they are as free as humans to decide who they are and what they do.
- When every D&D book is reprinted, we have an opportunity to correct errors that we or the broader D&D community discovered in that book. Each year, we use those opportunities to fix a variety of things, including errors in judgment. In recent reprintings of *Tomb of Annihilation* and *Curse of Strahd*, for example, we changed text that was racially insensitive. Those reprints have already been printed and will be available in the months ahead. We will continue this process, reviewing each book as it comes up for a reprint and fixing such errors where they are present.
- Later this year, we will release a product (not yet announced) that offers a way for a player to customize their character's origin, including the option to change the ability score increases that come from being an elf,

a dwarf, or one of D&D's many other playable folk. This option emphasizes that each person in the game is an individual with capabilities all their own.

- *Curse of Strahd* included a people known as the Vistani and featured the Vistani heroine Ezmerelda. Regrettably, their depiction echoes some stereotypes associated with the Romani people in the real world. To rectify that, we've not only made changes to *Curse of Strahd*, but in two upcoming books, we will also show—working with a Romani consultant—the Vistani in a way that doesn't rely on reductive tropes.
- We've received valuable insights from sensitivity readers on two of our recent books. We are incorporating sensitivity readers into our creative process, and we will continue to reach out to experts in various fields to help us identify our blind spots.
- We're proactively seeking new, diverse talent to join our staff and our pool of freelance writers and artists. We've brought in contributors who reflect the beautiful diversity of the D&D community to work on books coming out in 2021. We're going to invest even more in this approach and add a broad range of new voices to join the chorus of D&D storytelling.

And we will continue to listen to you all. We created 5th edition in conversation with the D&D community. It's a conversation that continues to this day. That's at the heart of our work—listening to the community, learning what brings you joy, and doing everything we can to provide it in every one of our books.

This part of our work will never end. We know that every day someone finds the courage to voice their truth, and we're here to listen. We are eternally grateful for the ongoing dialog with the D&D community, and we look forward to continuing to improve D&D for generations to come.

# D&D Newsletter

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# EXHIBIT C



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**By Jeremy Crawford, Game Design Architect – D&D TRPG Studio**

*October 4th, 2021*

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The most recent D&D book, *The Wild Beyond the Witchlight*, features two new playable races and a gaggle of Feywild monsters and NPCs. In this installment of *Sage Advice*, I talk about some of the rule evolutions present in those new options. I'll start with the stat blocks and then visit the new races.

## STAT BLOCK REFINEMENTS

Over the past year or so, we've been refining the D&D stat block to make it easier to use and to improve how DM-controlled creatures function in play. The following sections describe the main changes we've made. You can find these changes in *The Wild Beyond the Witchlight*, as well as in *Fizban's Treasury of Dragons*, *Strixhaven: A Curriculum of Chaos*, and *Mordenkainen Presents: Monsters of the Multiverse*.



BULLYWUG KNIGHT						
Medium Humanoid, Typically Lawful Good						
Armor Class 18 (plate)						
Hit Points 66 (12d8 + 12)						
Speed 30 ft., swim 30 ft.						
STR	DEX	CON	INT	WIS	CHA	
16 (+3)	12 (+1)	13 (+1)	9 (-1)	11 (+0)	14 (+2)	
Saving Throws Con +3, Wis +2						
Senses passive Perception 10						
Languages Bullywug, Common						
Challenge 3 (700 XP) Proficiency Bonus +2						
<b>Amphibious.</b> The knight can breathe air and water.						
<b>Speak with Frogs and Toads.</b> The knight can communicate simple concepts to frogs and toads when it speaks in Bullywug.						
<b>Standing Leap.</b> The knight's long jump is up to 20 feet and its high jump is up to 10 feet, with or without a running start.						
<b>ACTIONS</b>						
<b>Multiattack.</b> The knight makes two Glaive attacks.						
<b>Glaive.</b> <i>Melee Weapon Attack:</i> +5 to hit, reach 10 ft., one target. <i>Hit:</i> 8 (1d10 + 3) slashing damage.						
<b>BONUS ACTIONS</b>						
<b>Croak of Charming (Recharges after a Short or Long Rest).</b> The knight makes a loud croak while targeting one creature it can see within 30 feet of it. The target must succeed on a DC 12 Wisdom saving throw or be charmed until the end of its next turn.						



*Click for larger view*

## CREATURE TYPE

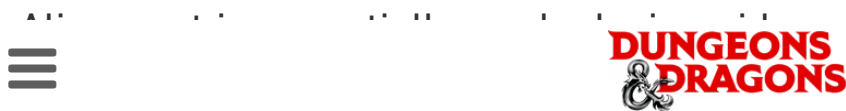
Creature types are now always capitalized. We've made this change so that it's easier to tell in our rules when we're talking about a monster of a certain type (a Giant, for example), rather than using a word in its normal sense ("She was a giant in the bard community").

We've also gotten strict about which monsters get the Humanoid creature type. This type is now reserved for creatures who are humanlike in their moral and cultural range. As we update older books, we'll reassign some Humanoids to other creature types. When *Monsters of the Multiverse* is released, you'll see that some former Humanoids are now Monstrosities, Fey, and other types.

## ALIGNMENT

Alignment had a time out in the stat blocks of *Candlekeep Mysteries* and *Van Richten's Guide to Ravenloft*. We omitted alignment in those books as a temporary measure, giving us time to determine how to handle alignment going forward. Now that we've done that work, alignment returns in *The Wild Beyond the Witchlight* and appears in all our other upcoming books as well.

So why did alignment get a time out? For a while, there'd been some confusion in the community about alignment's role in D&D. In the rules of the *Player's Handbook*, you choose your character's alignment, and in the rules of the *Monster Manual*, the DM determines a monster's alignment. No matter what alignment is chosen, a creature's alignment describes that creature's moral outlook; alignment doesn't determine the creature's behavior.



Both books are clear about the player and the DM having the final say on alignment, but both books also plant a seed of doubt. The *Player's Handbook* suggests alignments for various folk in the D&D multiverse, and the stat blocks in the *Monster Manual* include alignments without reminding the DM that those alignments are merely suggestions.

To eliminate that seed of doubt while preserving alignment's function as a roleplaying tool, we've made the following changes:

- Only named individuals, such as Mister Witch and Mister Light, have a definite alignment.
- Generic Humanoids bear the words "Any Alignment," reminding the DM that such people have vast moral range.
- Magical creatures that have a strong moral inclination (angels, demons, devils, undead, and the like) have an alignment preceded by the word "Typically." For example, a demon's stat block says "Typically Chaotic Evil," since it is typical for a D&D demon to be chaotic evil. That one word—"typically"—reminds the DM that the alignment is a narrative suggestion; it isn't an existential absolute. The holy can fall, and the fiendish can rise. Members of certain organizations—charitable knighthoods or diabolical cults, for example—also sometimes get the "Typically" treatment.
- Creatures, such as most Beasts and Oozes, that are incapable of moral discernment continue to lack an alignment and therefore bear the term

“Unaligned.”

## TAGS

Occasionally a creature has a tag—Elf, Goblinoid, Titan, or the like—that identifies an important detail that doesn't appear elsewhere in the stat block. We've begun introducing new tags, which some rules now reference, allowing us to create fresh ways for creatures to interact with the game's system. For example, some creatures now include a tag that is the name of a spellcasting class, such as Cleric, Druid, or Wizard, and *Monsters of the Multiverse* includes a rule that says such a tag means the creature counts as a member of the named class for the purpose of magic item attunement.

## PROFICIENCY BONUS

Many of the numbers in a stat block include the creature's proficiency bonus. Because of that fact, a creature's proficiency bonus now appears in the stat block. The number sits to the right of the creature's challenge rating.

## BONUS ACTIONS

If a creature has any bonus actions, those actions now appear in a section called “Bonus Actions” in the stat block. That section goes after the “Actions” section, and if a monster has a “Reactions” section, the “Bonus Actions” section goes between “Actions” and “Reactions.”

This new section makes it easier for a DM to spot bonus actions when running a creature, which previously hid among a creature's traits near the top of the stat block.

## SPELLCASTING

Since 2014, spellcasting creatures have tended to have the Spellcasting trait, the Innate Spellcasting Trait, or both. Starting in 2021, we have merged those

two traits into an action called Spellcasting. That action now appears in the “Actions” section of a stat block, and it has a few important qualities:

- The Spellcasting action doesn’t use spell slots. A creature can cast the action’s spells a certain number of times per day.
- The only spells that appear in the Spellcasting action are ones that take an action to cast. If a spell requires a bonus action, a reaction, or a minute or more to cast, that spell must appear elsewhere in the stat block. This change ensures that bonus actions and reactions—such as misty step and shield—aren’t hiding out in a list of spells.
- We’re more selective about which spells appear in a stat block, focusing on spells that have noncombat utility. A magic-using monster’s most potent firepower is now usually represented by a special magical action, rather than relying on spells.

## NEW CHARACTER RACES



The new character races in *The Wild Beyond the Witchlight*—the fairy and the harengon—both appeared in *Unearthed Arcana*, and they now appear in their final form in that book. The races have several characteristics that you’ll see not only in the book, but also in the character races in our other upcoming books. These characteristics are explored below.

## CREATURE TYPE

In the past, a character race was presumed to have the Humanoid creature type. In the new races, the character's creature type is specified. For example, the fairy has the Fey creature type.

Creature types don't have rules themselves, but some rules in the game affect creatures of certain types in different ways. For example, the *cure wounds* spell doesn't work on a Construct or an Undead.

## ABILITY SCORE INCREASES

New character races don't have the Ability Score Increase trait that *Player's Handbook* races have. The new races instead rely on a special character-creation rule that allows a character to increase one ability score by 2 and another score by 1 or to increase three different ability scores by 1. The lack of the Ability Score Increase trait helps make your choice of race and your choice of class independent from each other, broadening the types of characters we're likely to see at the game table.

If you're having trouble deciding which scores to increase, we recommend consulting your class's "Quick Build" section. For example, the bard's "Quick Build" section recommends you increase your character's Charisma and Dexterity.

## AGE

New character races lack an Age trait. We instead now provide the following text about a character's life span: "The typical life span of a player character in the D&D multiverse is about a century, assuming the character doesn't meet a violent end on an adventure. Members of some races, such as dwarves and elves, can live for centuries."

## ALIGNMENT

Previously, the text of a character race suggested an alignment for your character. Newer races contain no such alignment suggestions, since a character's alignment is entirely under the purview of the player.

## SIZE

Some new races, including the harengon, let you choose whether your character starts Medium or Small, reflecting the fact that some races contain an especially broad range of builds. You'll see this choice in other races in the future.

Also, rather than suggesting height and weight in a race, we provide the following text: "Player characters, regardless of race, typically fall into the same ranges of height and weight that humans have in our world. If you'd like to determine your character's height or weight randomly, consult the Random Height and Weight table in the *Player's Handbook*, and choose the row in the table that best represents the build you imagine for your character."

## LANGUAGES

The new races lack traits that are purely cultural, so they don't include a Languages trait. Instead, new characters start knowing Common and one other language that you and your DM agree is appropriate for your character.



## RABBIT HOP QUESTIONS

**When a harengon uses Rabbit Hop, does the trait's jump expend movement?** The Rabbit Hop trait lets a harengon jump as a bonus action, and that jump doesn't consume any of the harengon's normal movement. That fact is why the trait has a limited number of uses between long rests. If you compare the wording of Rabbit Hop to the wording of the long and high jump rules in the *Player's Handbook*, you'll see that those rules explicitly expend movement, whereas Rabbit Hop doesn't.

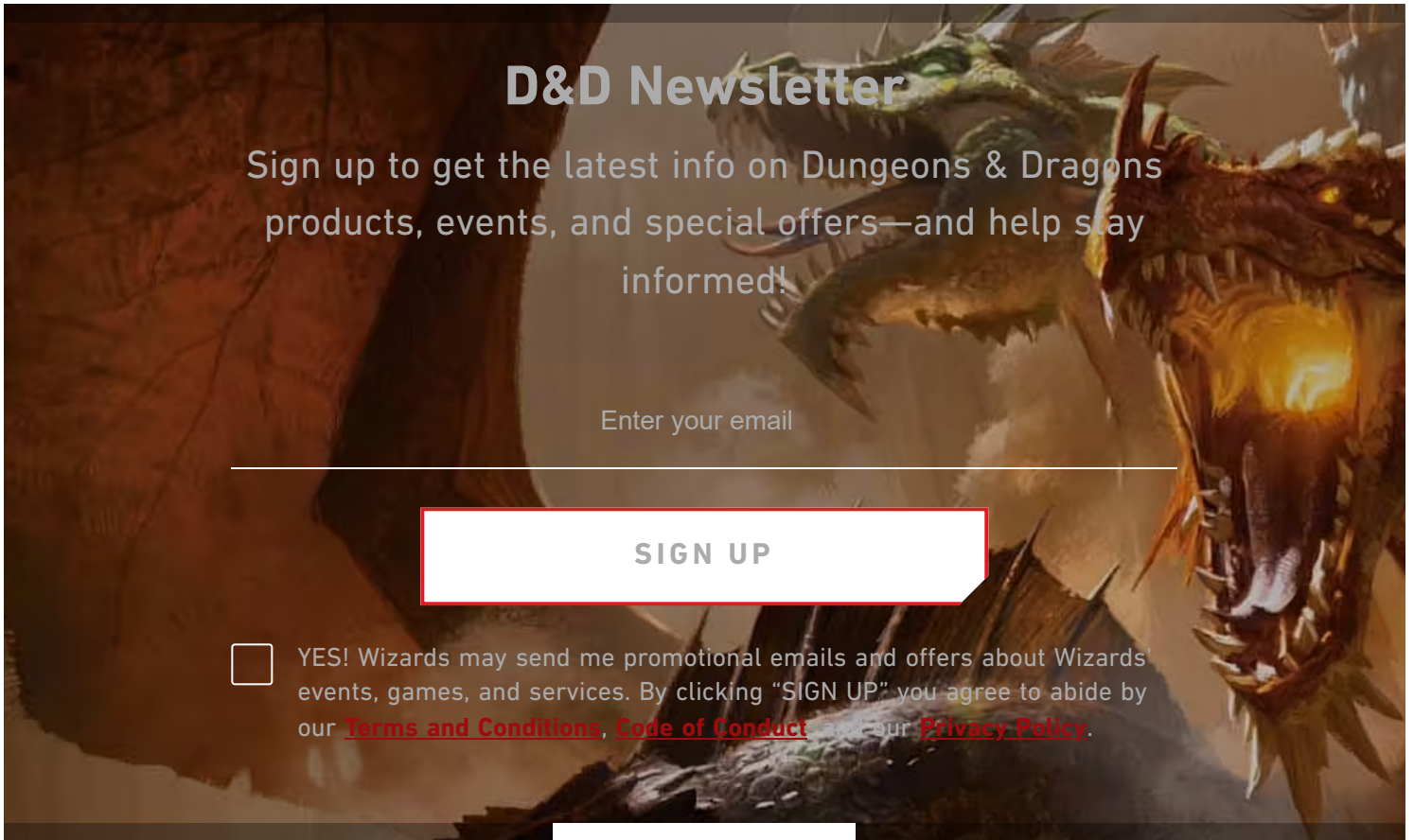
**Is Rabbit Hop a high jump or a long jump?** The jump of Rabbit Hop is neither a high jump nor a long jump. If it were either, its text would say so.

**Does the *jump* spell benefit Rabbit Hop?** Yes, the jump spell can affect the jump distance of Rabbit Hop. If you cast that spell on a harengon, enjoy the magnificent leaps!

**Are you required to jump the full distance of Rabbit Hop?** You don't have to jump the full distance of Rabbit Hop when you use it. We will clarify that intent in future printings of the Rabbit Hop trait.

# SAGE ADVICE COMPENDIUM

Curious how certain rules are intended to work in D&D? Check out the game’s FAQ, the **Sage Advice Compendium**. The compendium also includes links to errata PDFs for some of the game’s books.



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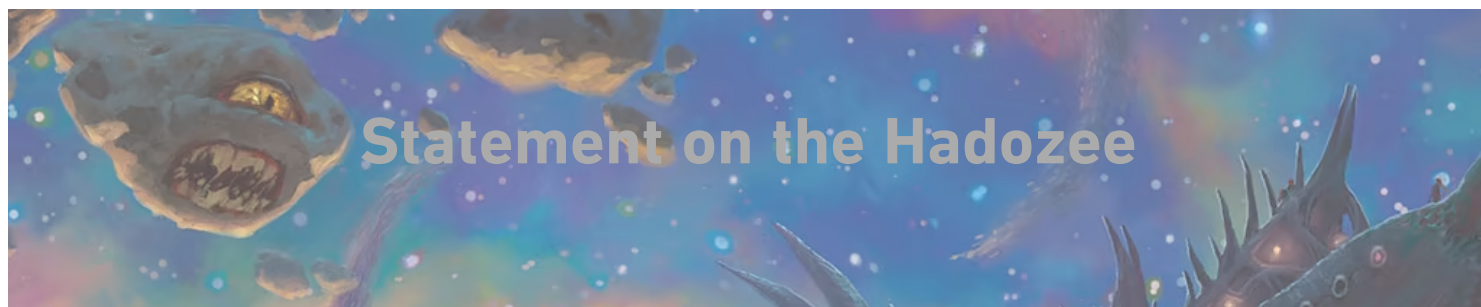
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# EXHIBIT D



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*September 2nd, 2022*

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We wanted to acknowledge and own the inclusion of offensive material within our recent *Spelljammer: Adventures in Space* content. We failed you, our players and our fans, and we are truly sorry.

The campaign includes a people called Hadozee which first appeared in 1982. Regrettably, not all portions of the content relating to the Hadozee were properly vetted before appearing in our most recent release. As we continue to learn and grow through every situation, we recognize that to live our values, we have to do better.

Throughout the 50-year history of *Dungeons & Dragons*, some of the characters in the game have been monstrous and evil, using descriptions that are painfully reminiscent of how real-world groups have been and continue to be denigrated. We understand the urgency of changing how we work to better ensure a more inclusive game.

Effective immediately, we will remove the offensive content about Hadozee in our digital versions – and these will no longer be included in future reprints of the book. Our priority is to make things right when we make mistakes. In

addition, we've initiated a thorough internal review of the situation and will take the necessary actions as a result of that review.

We are eternally grateful for the ongoing dialog with the D&D community, and we look forward to introducing new, engaging and inclusive content to D&D for generations to come. D&D teaches that diversity is strength, for only a diverse group of adventurers can overcome the many challenges a D&D story presents. In that spirit, we are committed to making D&D as welcome and inclusive as possible. This part of our work will never end.

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# EXHIBIT E

# The Dungeons & Dragons Community Is Committing Itself to Diversity

In this age of social justice, fans and players of the hit game have made active changes for a more diverse dungeoning experience.



Screens x September 9, 2021



While the entertainment industry is just beginning to embrace diversity through its casting, popular D&D actual play shows like "Critical Role" have always done their part to represent D&D fans from all walks of life. (Image via Instagram/@critical\_role)

## The Dungeons & Dragons Community Is Committing Itself to Diversity

In this age of social justice, fans and players of the hit game have made active changes for a more diverse dungeoning experience.

By [Jenna Nelson](#), Scripps College

In the summer of 2020, the United States undertook the grand task of [addressing systemic racism](#). The entertainment industry was a major part of this cultural shift; since entertainment is so visible, it's easy for people to comment on its diversity.

Diversity in TV, music and movies is so important because of [representation](#) — people should be able to relate to who they see on their screens. And for many, the people on their screens are [Dungeons & Dragons](#) players. The classic tabletop role-playing game (shortened to TTRPG) is simple in concept: make up a character, assign them skills and get into a story. It is an incredibly popular game, and web shows that focus on it, called [actual play shows](#), are even more popular.

As the entertainment industry further attempts to diversify, D&D creators and actual play shows have been leading the charge. The game itself is built for diversity, but beyond that, its creators have tried to make it even more inclusive. Most importantly, popular actual play shows have diversified both their players and their game masters.

## A Game Built for Diversity

While mentions of D&D usually bring visions of dice and figurines, the most important phase of a game, character creation, doesn't involve any of that. Unlike most tabletop games, TTRPGs have no preset list of characters. Each player creates a completely new character for each game they play.

Character creation is a deeply nuanced process that takes years of practice to do without a guide, but the most important parts are easy. First, players select the [race](#) of their character, which could be anything from human to orc, and even to dragon born. Second, players pick their character's gender, which is entirely up to the player's preference since skills in the game are not gendered. Lastly, players choose their [class](#), which governs their character's personality and skills; classes are general archetypes that define what a character can do.

Considering these three choices, there are countless options for a player to best optimize their character. What's even better is that any character is just as effective as another, regardless of a player's choices. The best example of this is in the "[Dimension 20](#)" episode "[The Unsleping City](#)." [Pete Conlan](#) is a transgender, former drug dealer-turned-sorcerer and is just as effective as [Kingston Brown](#), a Black man who is both a nurse and a cleric.

Start Spreading the News (Ep. 1) | [The Unsleping City](#)

## The Wizards' Continuing Work

The often uncredited heroes of Dungeons & Dragons are its creators, known as [The Wizards of the Coast](#). These are the people that write the rules of the game and constantly update the content with new options for races and classes. When the entertainment industry began to work toward diversity, the Wizards revealed a new set of updates.

In a [June 2020 announcement](#), the Wizards said, "Throughout the 50-year history of D&D, some of the peoples in the game — orcs and drow being two of the prime examples — have been characterized as monstrous and evil, using descriptions that are painfully reminiscent of how real-world ethnic groups have been and continue to be denigrated. That's just not right, and it's not something we believe in."

For those unfamiliar with the game, this statement doesn't seem to hold much water. However, it speaks volumes. [Orcs](#) and [drows](#) (also called night elves) are two races in the game that always seem



to be villains. This categorization leads to what is essentially in-game racism — orc and dwarf characters are immediately distrusted because of these descriptors. By promising to abolish these in-game stereotypes, the Wizards show that they care about abolishing real stereotypes in those who play their game.

## Game Masters Leading the Way

It is well-documented that a majority of D&D game masters, both in home games and actual play shows, are white men. Although many of these GMs have spoken out against systemic racism and their own privilege, the problem remains: D&D stories are often told from a white, male perspective.

In the summer of 2021, however, the two most popular actual play shows did something about this. Both “Critical Role” and “Dimension 20” announced that their summer seasons would be led by Aabria Iyengar. Dubbed the #SummerofAabria, these consecutive announcements offered great hope to the Dungeons & Dragons community. Fans loved seeing a Black woman tell stories at their favorite D&D tables.

The Nameless Ones | Exandria Unlimited | Episode 1

#SummerofAabria is important because storytelling needs diverse voices. As evidenced by decades of D&D games, it’s easy to fall into a rut of stories that white men want to tell. How many games consist of warriors hunting down and killing a dragon? Aabria’s work in both seasons is successful in every regard: She offered unique and compelling stories while encouraging her players to delve into their emotions — a trait most games are lacking.

## Diverse Casts and Inclusive Storytelling

Since everyone at the table is weaving the tale together, diverse casts ensure inclusive storytelling. Just like how a class is boring if only one type of author is featured, Dungeons & Dragons games should include complex and differing perspectives. By incorporating the different experiences represented at a diverse table, both the game master and the players have more material to work with in-game.

This is because characters are an extension of their players. The players’ experiences usually inspire character creation. For example, many a D&Der has created a character similar to their younger selves because they are experts in their source material, and also know how the character can develop.

Both “Dimension 20” and “Critical Role” have put diversity and inclusive storytelling into practice. “Dimension 20” has made a noticeable effort to diversify; the show’s most recent seasons feature transgender and queer players, more people of color than white people and more women than ever before. The most recent “Critical Role” summer season, “Exandria Unlimited,” featured both some familiar faces and newcomers Aimee Carrero, Robbie Daymond and Anjali Bhimani.

## The Final Dungeon

With all these successes, there is still more work to be done. The main issue is clear; the shows that have had to become more diverse grew their audience without their new commitments. The actual play shows that were created by queer people, women or people of color severely lack the audiences that these shows gain so easily.

Others hope that diversity in actual plays will trickle down into home games and the Dungeons & Dragons community as a whole. How could the effectiveness of representation even be measured? For

now, the most important thing the D&D community can do is amplify marginalized voices in their game that is already built to do so.



[DUNGEONS & DRAGONS](#) [PREVIEWS](#) [TABLETOP GAMES](#)

## D&D's next book includes an adventure inspired by the Black experience in the American South

*Fans of Lovecraft Country are in for a treat*

By [Charlie Hall](#) | [@Charlie\\_L\\_Hall](#) | Mar 25, 2022, 3:37pm EDT

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Image: Sija Hong/Wizards of the Coast

[Journeys Through the Radiant Citadel](#), the next anthology of adventures for [Dungeons & Dragons](#), will be the first book written entirely by people of color in the nearly 50-year history of D&D. Sixteen writers gave their time and expertise to Wizards of the Coast, among them author and game designer [Erin Roberts](#). Her

adventure is called “Written in Blood,” and it will immerse players in a new location called Godsbreath, a land inspired by her own family history.

“Godsbreath is really my personal love letter [and] homage to the Black experience in the Southern United States,” Roberts said during a presentation for the press. “It’s really exciting to me to get a chance reach back to my family’s own past and legacy in Mississippi, Florida, and Georgia.”

Roberts is an early career fellow at The University of Texas at Austin. Her past gaming work includes several products for Paizo, where she contributed to both the Pathfinder and Starfinder lines, and writing for the mobile game *Zombies, Run!* In writing for Wizards she said she was initially inspired by a book written by her great uncle, professor Chalmers Archer, first published in 1991.





Proclaimer Tungsten | Image: [Jabari Weathers](#)/Wizards of the Coast

“The first thing that I did when I got the chance to do this was run to my great uncle’s book, *[Growing Up Black in Rural Mississippi](#)*, the one that is actually inscribed to me and my sisters,” Roberts said. “I flipped through it — there’s pictures of my family on it, [pictures of] my great grandmother — and really to get a chance to ground myself in what the sort of experience was in Black, rural South [in the 1930s and ’40s] and how I can make that magical and amazing in a D&D context.”

Godsbreath is more than just a singular city or a tiny village. It’s an entire region, one that makes use of geographical analogs that map closely to the American South. There’s a murky area called Nightwater Cove that was inspired by the Louisiana bayou country. Each of its many islands have their own culture and trade specialty, but the waters that surround it are infested with dangerous monsters. There’s a port city, called Promise, that serves as a stand-in for bustling urban centers like Biloxi, Mississippi, or New Orleans. But the real action of this adventure will take place in a rural area called The Ribbon, a rich swath of land that supports a vibrant farming community. Environmental pressures are causing farmers to break new land and plant crops in the uncharted wilderness, and an unwholesome supernatural force is rushing out of that wilderness to meet them.

During the adventure, players will get the opportunity to travel with several different non-player characters. These NPCs, Roberts said, will be instrumental in helping the players to discover Godsbreath and the people who live there. One of the most important NPCs, named Tungsten, is a kind of historian known as a Proclaimer. Roberts described Proclaimers as being part cleric and part bard, and their job is to

enshrine people and deeds into the history of Godsbreath by adding new stanzas to The Awakening Song.

“It is an oral history through song of basically everything of note that has happened since the very early days of this region,” said Roberts. “Every year people come together and sing it together and celebrate and think back on what’s happened and how they’ve gotten here, and who are the people they’ve lost along the way, and where does the future go.”

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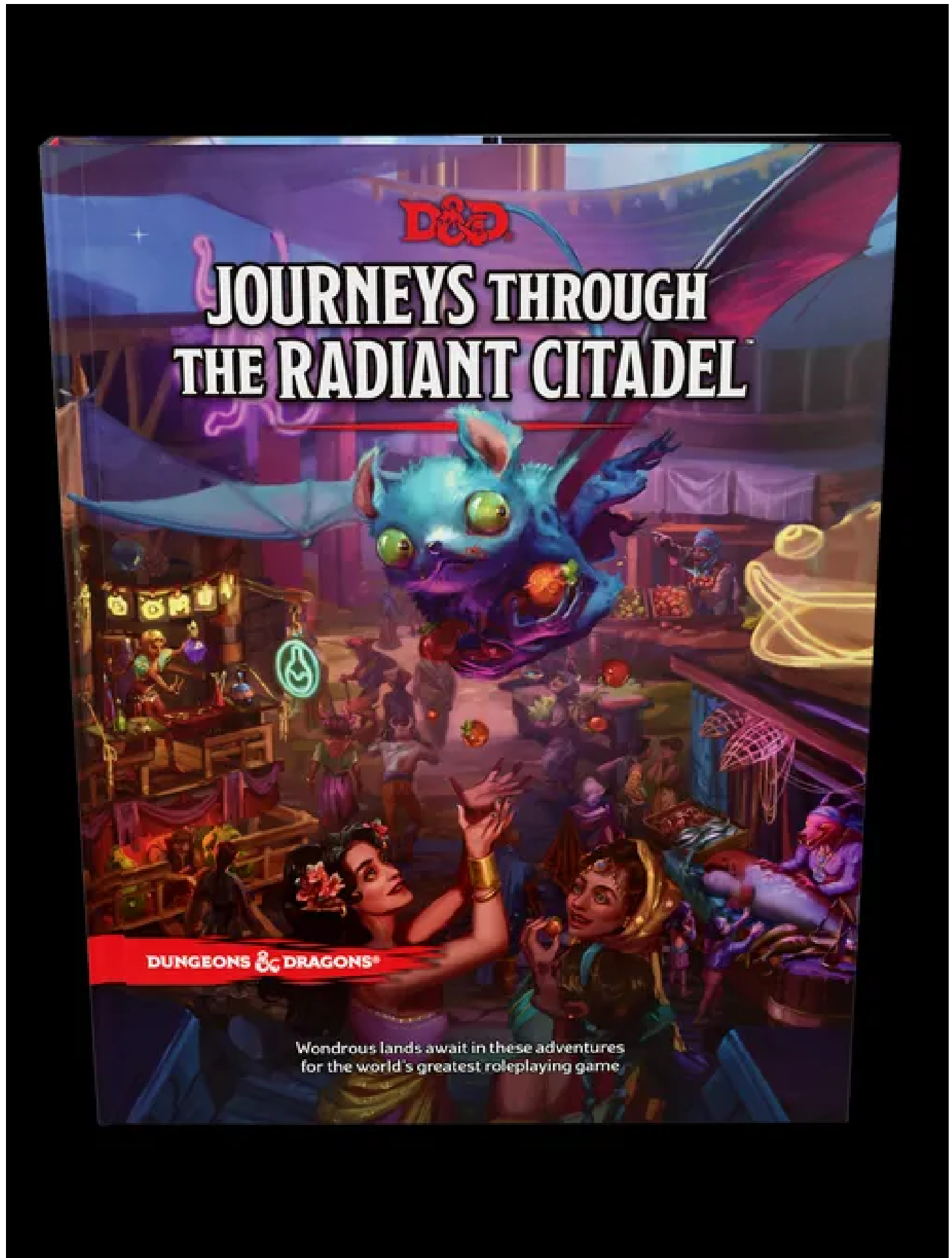
[D&D’s new starter adventure isn’t about saving the world — it’s about family](#)

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“I love that [players] can sort of get a chance to understand the region [through these NPCs],” Roberts said, “and maybe people will want to be Proclaimers themselves and figure out ‘how can I be someone from this region who’s now gone out and is exploring the wider world?’”

“Written in Blood” is an adventure for third-level characters. *Journeys Through the Radiant Citadel* will arrive [in stores](#) and [online](#) starting June 21 and will cost \$49.99. It will also be available in [digital formats](#), including on Roll20, *Fantasy Grounds*, and through the D&D Beyond toolset.

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# D&D's 'Radiant Citadel' changes the game for BIPOC players

If you're a fan of the hit Netflix show "Stranger Things," then you know that the fantasy tabletop-role playing game "Dungeons & Dragons" has come roaring back into the mainstream in the past few years.

But for most of its existence, D&D has had a problem.

While the adventures were out of this world, and the humanoid avatars were as diverse as the player's imagination, the game was played, and made, primarily by white men.

But a reckoning and an evolution has been under way for several years at Wizards of the Coast, the Renton-based company that makes "Dungeons and Dragons" (Wizards is now owned by Hasbro).

One symbol of that change is the newest D&D adventure book, "Journeys Through the Radiant Citadel," which goes on sale tomorrow.

The book was created and written by an entirely BIPOC team of creators, led by Ajit George. BIPOC stands for "Black, Indigenous and People of Color." George and fellow author Justice Arman told KUOW about their experiences not only playing D&D, but putting together their groundbreaking book.

George says that the book is a quantum leap forward.

"It is a game changer, it feels like it is ushering a new era," he said. "Because you have 16 writers of color that worked on this for two years, there is a complexity and nuance and thoughtfulness in this book that is rare in any medium."

Justice mentions that having an adventure book that you put yourself into is very different from other forms of entertainment, like tv shows or movies.

"If you watch a movie and you see a character who's POC, you might identify with that character, and it might feel good to have that representation," he said. "It's very different to play a game and step into someone's shoes and be in their world to be able to interact with it."



A dish with a standard 11 dice set on top of a D&D character sheet.  
Credit: Jason M Burrows

George also explained that the enormous auroral diamond that the Radiant Citadel is built around was based, in part, on the Statue of Liberty.

"The Radiant Citadel, in many ways, is like a fantasy in New York City," he said. "All of these different cultures have come here for different reasons, under different struggles, in complex circumstances, and in many cases, as refugees."

George said the book speaks to what America meant for his parents and grandparents.

"What this country can be and has been for many immigrants," he said. "And I think that that is really a central part of who I am and what I put into the writing."

Justice says he's excited for people to be able to play in a world made by the people who understand the cultures they're drawing inspiration from.

"What people are going to get is something so authentic, while also feeling so fresh, and so fun to engage with," he said. "In some ways, we're giving people what they want, which is a new culture, to engage with a story that they're getting from the source, they're getting it from people who fundamentally understand the stories who understand the culture, who understand the themes behind it."

For the players' perspective, KUOW talked with two members of the d20 Dames, a family-friendly D&D podcast with a cast that is all femme-identifying and predominantly BIPOC.

Kat Kruger, the dungeon master and defacto host of the podcast, said she was floored by the idea behind the book.

"I was really very excited at the whole idea that an entire book could be written by people who traditionally haven't been given that opportunity," she said. "Even though in recent years more and

more of that community is represented in streaming and podcasts, but we haven't really seen that in official products. And so it's very exciting. It feels like a very foundational moment in D&D history, which is so exciting."

Brittini Leigh Liyanage, a player with the d20 Dames, said she too was excited.

"I love this book because I see myself," she said. "As a half-black half-Sri Lankan person I do literally see myself in the book, which I never thought I would see in any D&D book ever."

Liyanage said that, while the book spoke to her, it speaks to the entire D&D community.

"It's beautiful, it's colorful, it's vibrant, it's different," she said. "It's all of these amazing things. But without that support from the general public, the money runs out, the budget doesn't get approved. It really does need to be a community effort."

Kruger said she is optimistic about the future of inclusion in tabletop gaming.

"Thankfully though, we have seen some really great changes," she said. "We've seen great hires, we've seen great content, and I think it culminated into this."

But she said the foundational moment shouldn't stop with the publication of the book.

"It needs to it needs to grow from here and it needs to see more support from the community as well from allies recognizing how important this book is and how how great the content is, how unique it is, and how much flavor there there is," Kruger said. "It's just it's so full of really interesting world building that we have not really seen before. And we want more of that."

You can find the d20 Dames and all of their adventures at [d20dames.com](https://d20dames.com).

[Journeys Through the Radiant Citadel](#) is out in stores and online Tuesday, July 19.

*If you are a Dungeons and Dragons player, or have thoughts about inclusion in gaming, you can share your thoughts on this story at [kuow.org/feedback](https://kuow.org/feedback).*



 SYFY Wire



MARCH 22, 2022, 9:00 AM ET

# DUNGEONS & DRAGONS' NEXT BOOK BOASTS ALL-POC WRITERS AND 13 NEW ADVENTURES

*Journeys Through the Radiant Citadel*, out June 21, is “something we have not seen in D&D before.”

By James Grebey



Photo: Wizards of the Coast

*Dungeons & Dragons'* next adventure book will take players and DMs to fantastic new lands that are brand-new to the roleplaying game. *Journeys Through the Radiant Citadel*, out June 21, is an anthology of adventures set in diverse new lands — and for the first time in the roleplaying game's history, the book's creators are diverse as well. All 16 of the book's writers are people of color who drew upon their heritage and culture when crafting their adventures.

"I couldn't shake the idea of a whole book written by Black and brown writers inspired by their own cultures and stories," Ajit George, the co-leader of the book, told SYFY WIRE during a press preview. In addition to the writers, many other people involved in the book's creation, including artists, consultants, and developers, were minorities as well.

“50 POCs worked on the book or supported the book in some capacity,” George said. “I don’t think there is any other project in game history that has had that many POCs on it before.”

Viewed as part of the nearly 50-year-old game’s recent push towards inclusivity and representation, *Journeys Through the Radiant Citadel* is a natural and frankly overdue development (even if it will no doubt anger those who go off on tirades about “wokeness”). But *Journeys Through the Radiant Citadel*’s diverse cast of creators is far more than just a welcome statistic, as the adventures contained in the book’s pages promise to be new and exciting in part because they’re drawing from experiences that are outside that of the historical *D&D* writer’s.

As with *Candlekeep Mysteries*, last March’s anthology release, *Journeys Through the Radiant Citadel* provides a hub world of sorts that can serve as a home base while players go off on 13 adventures geared towards characters from level 1 to level 11. (DMs can also pick specific adventures to run as one-shots or slot into their own campaign.)

The titular Radiant Citadel is a city that was established in the ethereal plane by 27 great civilizations ages ago before it was forgotten, and then, 250 years ago, descendants from 15 of those civilizations reestablished it. The city, which is carved from a massive fossil of a seemingly extinct creature that nobody in the multiverse has ever seen. Surrounding the city are 15 Concord Jewels that allow for travel between the city and the lands (and adventures!) they’re connected to. (The 12 missing civilizations from the founding 27 are therefore in-fiction opportunities for DMs to create new worlds or link the Radiant Citadel to a homebrew or published setting.)



Photo: Wizards of the Coast

Wizards of the Coast teased three of the adventures during the press preview. The first, “Salted Legacy,” an adventure for players at levels 1 and 2, takes place in the Siabsungkoh Valley and throws gamers “into a generational feud between two rival vendor families after a series of vandalisms and thefts begin to appear,” according to writer Surena Marie. The intentionally low-stakes adventure draws on Marie’s own experience as a first-generation Thai American, as one family at the Dyn Singh Night Market wants to expand while the other wants to hold on to tradition.

Players will have to win the vendors’ trust by playing market games, including a spicy pepper contest and timed cooking contest “where you defeat giant prawns to make prawn patties.” Marie said the games are a great icebreaker for new parties.







Photo: Wizards of the Coast

The second adventure, “Written in Blood,” is quite different in tone, as the name might suggest. Writer Erin Roberts called it “a personal homage to the Black experience in the southern United States.”

In “Blood,” players will make their way to a Riverport city she likened to Biloxi or New Orleans for a festival where people gather for a celebration where they sing an oral history called “The Awakening Song,” but it’s disrupted when normally peaceful farmers attack while dripping with blood. The Level 3 adventure will force players to travel past the safe havens into the less-desirable, more monster-filled farming lands to find out what caused the madness. Roberts compared the story to *Lovecraft Country* or a Jordan Peele film in terms of vibe, though she added that her fantasy take on the Black diaspora intentionally doesn’t carry the same weight of real history as those titles, though it has “the essence of the community and joy.”





Photo: Wizards of the Coast

Finally, a Level 11 adventure, “Shadow of the Sun,” draws from Iranian culture. Written by Justice Ramin Arman, the adventure puts players in a city-state ruled

by a powerful angel who has an ever-growing list of edicts, and there are rival factions that either support their benevolent celestial ruler or want to take down a tyrant. On the eve of a magical lunar festival, players “are going to quickly discover that there’s not a lot of room for neutral ground in this city-state.”

Every adventure has its own pronunciation guide for DMs whose tongues might not be as used to pronouncing names that don’t hail from the western tradition. (“Good luck getting comfortable with that “khe” sound you hear in the Persian language,” Arman joked.)

This being an adventure book, there aren’t any new subclasses or races, and they didn’t mention any magical items, but *Journeys Through the Radiant Citadel* will feature 11 new monsters. In addition, players can get “charms” — magical boons they can receive as a result of doing something incredible on several of the adventures, and it is implied these charms have mechanical benefits.

George called *Journeys Through the Radiant Citadel* “something we have not seen in D&D before,” and referring both to the make-up of the creative team and the sorts of adventures within. “It is very much D&D, but it’s D&D in a new flavor with a fresh take.”

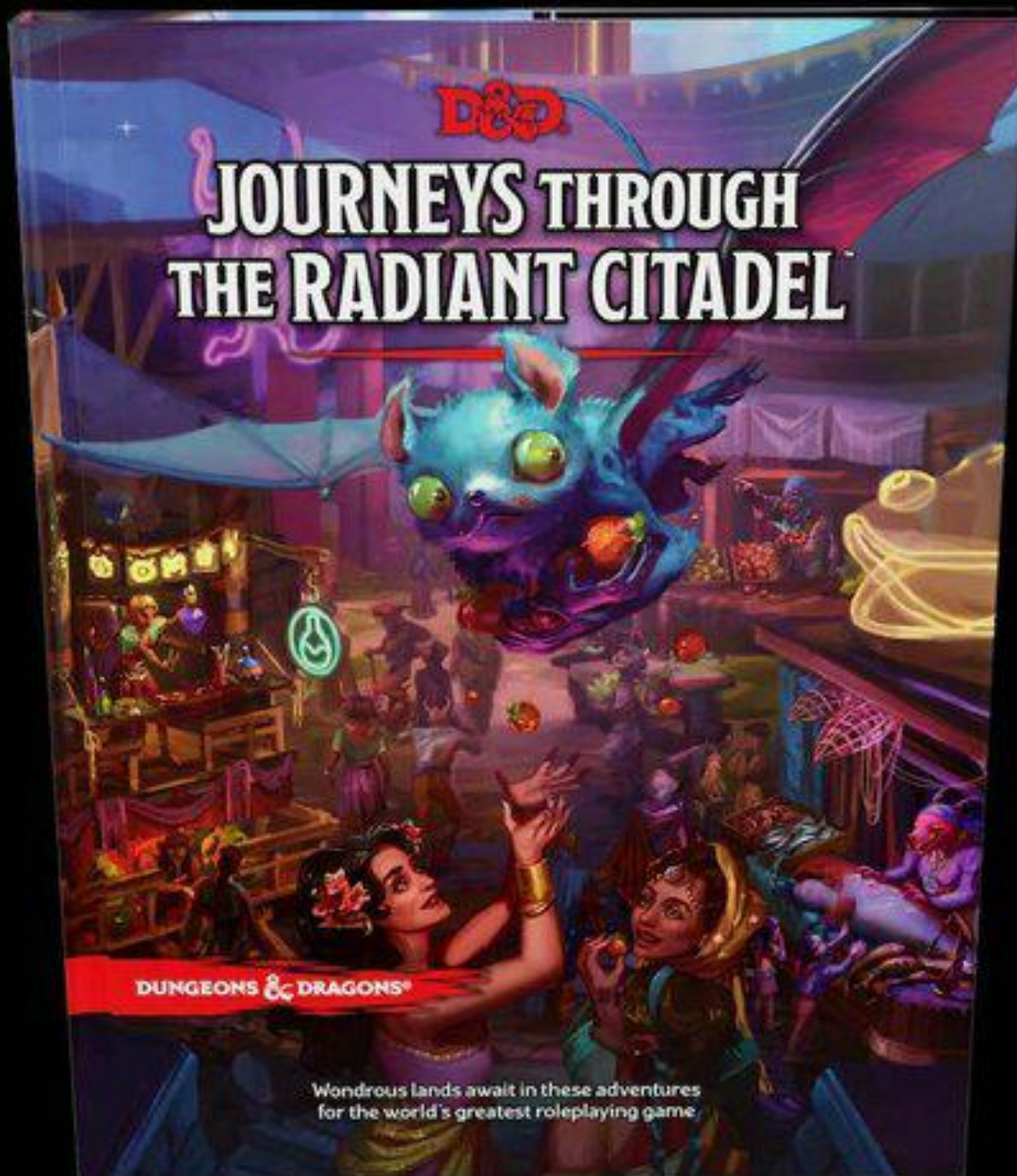


Photo: Wizards of the Coast

Journeys Through the Radiant Citadel *will be available on June 21.*