## A Other related work

Kearns and Mansour [KM99] (see also [Kea96]) analyzed top-down impurity-based heuristics from the perspective of *boosting*, where the attributes queried in the tree are viewed as weak hypotheses.

Recent work of Blanc et al. [BLT20b] gives a top-down algorithm for learning decision trees that achieves provable guarantees for all target functions f. However, their algorithm makes crucial use of *membership queries*, which significantly limits its practical applicability and relevance. Furthermore, their guarantees only hold in the realizable setting, requiring that f is itself a size-s decision tree (i.e.  $opt_s = 0$ ).

There has been extensive work in the learning theory literature on learning the concept class of decision trees [EH89, Blu92, KM93, OS07, GKK08, HKY18, CM19]. However, none of these algorithms proceed in a top-down manner like the practical heuristics that are the focus of this work; indeed, with the exception [EH89], these algorithms do not return a decision tree as their hypothesis. ([EH89]'s algorithm constructs its decision tree hypothesis in a *bottom-up* manner.)

### **B Proof of Fact 2.1**

Fact 2.1 is a simple consequence of the following lemma, whose proof also appears in [Jon16]: Lemma B.1. For all  $f : {\pm 1}^n \to {\pm 1}$  and  $i \in [n]$ ,

$$\operatorname{NS}_{\delta}(f) = \frac{1}{2} \operatorname{NS}_{\delta}(f_{x_i=-1}) + \frac{1}{2} \operatorname{NS}_{\delta}(f_{x_i=1}) + \frac{\delta}{2(1-\delta)} \cdot \operatorname{Inf}_{i}^{(\delta)}(f).$$

*Proof.* Let  $x \sim \{\pm 1\}^n$  be uniform random, and  $\tilde{x} \sim_{\delta} x$  be a  $\delta$ -noisy copy of x. We first note that

$$\mathbb{E}[f(\boldsymbol{x})f(\tilde{\boldsymbol{x}})] = \Pr[\boldsymbol{x}_{i} = \tilde{\boldsymbol{x}}_{i}] \cdot \mathbb{E}[f(\boldsymbol{x})f(\tilde{\boldsymbol{x}}) \mid \boldsymbol{x}_{i} = \tilde{\boldsymbol{x}}_{i}] + \Pr[\boldsymbol{x}_{i} \neq \tilde{\boldsymbol{x}}_{i}] \cdot \mathbb{E}[f(\boldsymbol{x})f(\tilde{\boldsymbol{x}}) \mid \boldsymbol{x}_{i} \neq \tilde{\boldsymbol{x}}_{i}] \\
= \left(1 - \frac{\delta}{2}\right) \left(\frac{1}{2} \mathbb{E}[f(\boldsymbol{x}^{i=1})f(\tilde{\boldsymbol{x}}^{i=1})] + \frac{1}{2} \mathbb{E}[f(\boldsymbol{x}^{i=-1})f(\tilde{\boldsymbol{x}}^{i=-1})]\right) \\
+ \frac{\delta}{2} \left(\frac{1}{2} \mathbb{E}[f(\boldsymbol{x}^{i=1})f(\tilde{\boldsymbol{x}}^{i=-1})] + \frac{1}{2} \mathbb{E}[f(\boldsymbol{x}^{i=-1})f(\tilde{\boldsymbol{x}}^{i=1})]\right).$$
(7)

Next, we have that

$$\mathbb{E}[D_i f(\boldsymbol{x}) D_i f(\tilde{\boldsymbol{x}})] = \frac{1}{4} \mathbb{E}\left[ (f(\boldsymbol{x}^{i=1}) - f(\boldsymbol{x}^{i=-1}))(f(\tilde{\boldsymbol{x}}^{i=1}) - f(\tilde{\boldsymbol{x}}^{i=-1})) \right] \\ = \frac{1}{4} \mathbb{E}[f(\boldsymbol{x}^{i=1}) f(\tilde{\boldsymbol{x}}^{i=1})] + \frac{1}{4} \mathbb{E}[f(\boldsymbol{x}^{i=-1}) f(\tilde{\boldsymbol{x}}^{i=-1})] \\ - \frac{1}{4} \mathbb{E}[f(\boldsymbol{x}^{i=1}) f(\tilde{\boldsymbol{x}}^{i=-1})] - \frac{1}{4} \mathbb{E}[f(\boldsymbol{x}^{i=-1}) f(\tilde{\boldsymbol{x}}^{i=1})].$$
(8)

Combining Equations (7) and (8),

$$\mathbb{E}[f(\boldsymbol{x})f(\tilde{\boldsymbol{x}})] = \frac{1}{2} \mathbb{E}[f(\boldsymbol{x}^{i=1})f(\tilde{\boldsymbol{x}}^{i=1})] + \frac{1}{2} \mathbb{E}[f(\boldsymbol{x}^{i=-1})f(\tilde{\boldsymbol{x}}^{i=-1})] - \delta \mathbb{E}[D_i f(\boldsymbol{x}) D_i f(\tilde{\boldsymbol{x}})] \\ = \frac{1}{2} \mathbb{E}[f_{x_i=1}(\boldsymbol{x})f_{x_i=1}(\tilde{\boldsymbol{x}})] + \frac{1}{2} \mathbb{E}[f_{x_i=-1}(\boldsymbol{x})f_{x_i=-1}(\tilde{\boldsymbol{x}})] - \frac{\delta}{1-\delta} \cdot \mathrm{Inf}_i^{(\delta)}(f).$$

Since  $NS_{\delta}(f) = Pr[f(\boldsymbol{x}) \neq f(\tilde{\boldsymbol{x}})] = \frac{1}{2} - \frac{1}{2} \mathbb{E}[f(\boldsymbol{x})f(\tilde{\boldsymbol{x}})]$ , the lemma follows from the above by rearranging.

Proof of Fact 2.1. We first note that

$$\begin{split} \mathrm{NS}_{\delta}(f, T^{\circ}_{\ell^{\star} \to x_{i}}) &= \sum_{\mathrm{leaves } \ell \in T^{\circ}_{\ell^{\star} \to x_{i}}} 2^{-|\ell|} \cdot \mathrm{NS}_{\delta}(f_{\ell}) \\ &= \sum_{\mathrm{leaves } \ell \in T^{\circ}} 2^{-|\ell|} \cdot \mathrm{NS}_{\delta}(f_{\ell}) \\ &+ 2^{-(|\ell^{\star}|+1)} \cdot \mathrm{NS}_{\delta}(f_{\ell^{\star}, x_{i}=-1}) + 2^{-(|\ell^{\star}|+1)} \cdot \mathrm{NS}_{\delta}(f_{\ell^{\star}, x_{i}=1}) - 2^{-|\ell^{\star}|} \cdot \mathrm{NS}_{\delta}(f_{\ell^{\star}}) \\ &= \mathrm{NS}_{\delta}(f, T^{\circ}) + 2^{-|\ell^{\star}|} \left(\frac{1}{2} \operatorname{NS}_{\delta}(f_{\ell^{\star}, x_{i}=-1}) + \frac{1}{2} \operatorname{NS}_{\delta}(f_{\ell^{\star}, x_{i}=1}) - \mathrm{NS}_{\delta}(f_{\ell^{\star}}) \right). \end{split}$$

Applying Lemma B.1 with its 'f' being  $f_{\ell^*}$ , we have that

$$\frac{1}{2}\operatorname{NS}_{\delta}(f_{\ell^{\star},x_{i}=-1}) + \frac{1}{2}\operatorname{NS}_{\delta}(f_{\ell^{\star},x_{i}=1}) - \operatorname{NS}_{\delta}(f_{\ell^{\star}}) = -\frac{\delta}{2(1-\delta)} \cdot \operatorname{Inf}_{i}^{(\delta)}(f_{\ell^{\star}}),$$

and this completes the proof.

# C Proof of Theorem 3

*Proof.* We apply Theorem 2 with 'T' being  $T^*$ , 'g' being  $f_{\delta}^{\leq d}$ , and  $\rho$  being the semimetric  $\rho(a, b) = (a - b)^2/2$ . As shown by [OSSS05] (and as can be easily verified),  $\text{Def}_k(\rho) \leq k$  for this choice of  $\rho$ , and so

$$\operatorname{Cov}_{\rho}(T^{\star}, f_{\delta}^{\leq d}) \leq k \sum_{i=1}^{n} \lambda_{i}(T^{\star}) \cdot \frac{1}{2} \mathbb{E}\left[ (f_{\delta}^{\leq d}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x}^{\sim i}))^{2} \right].$$
(9)

We first analyze the quantity on the LHS of Equation (9). For  $x, x' \sim \{\pm 1\}^n$  uniform and independent,

$$\operatorname{Cov}_{\rho}(T^{\star}, f_{\delta}^{\leq d}) = \frac{1}{2} \left( \mathbb{E} \left[ (T^{\star}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x}'))^{2} \right] - \mathbb{E} \left[ (T^{\star}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x}))^{2} \right] \right)$$
  
$$\geq \frac{1}{4} \mathbb{E} \left[ (f_{\delta}^{\leq d}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x}'))^{2} \right] - \mathbb{E} \left[ (T^{\star}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x}))^{2} \right]$$
  
$$= \frac{1}{2} \operatorname{Var}(f_{\delta}^{\leq d}) - \mathbb{E} \left[ (T^{\star}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x}))^{2} \right],$$
(10)

where the inequality uses the "almost-triangle" inequality  $(a - c)^2 \le 2((a - b)^2 + (b - c)^2)$  for  $a, b, c \in \mathbb{R}$ . Furthermore, we have

$$\begin{aligned} \operatorname{Var}(f_{\delta}) &= \sum_{S \neq \emptyset} (1-\delta)^{2|S|} \widehat{f}(S)^2 & (\text{Fourier formulas for } f_{\delta} \ (5) \text{ and variance } (4)) \\ &= \sum_{\substack{S \neq \emptyset \\ |S| \leq d}} (1-\delta)^{2|S|} \widehat{f}(S)^2 + \sum_{\substack{|S| > d}} (1-\delta)^{2|S|} \widehat{f}(S)^2 \\ &\leq \operatorname{Var}(f_{\delta}^{\leq d}) + \sum_{\substack{|S| > d}} e^{(-\delta)2|S|} \widehat{f}(S)^2 & (1+a \leq e^a) \\ &\leq \operatorname{Var}(f_{\delta}^{\leq d}) + e^{-2d\delta} \sum_{\substack{|S| > d}} \widehat{f}(S)^2 & (\operatorname{Since} |S| > d) \\ &\leq \operatorname{Var}(f_{\delta}^{\leq d}) + e^{-2d\delta} & (\operatorname{Parseval's identity} \ (3): \sum_{\substack{S \subseteq [n]}} \widehat{f}(S)^2 = 1) \\ &\leq \operatorname{Var}(f_{\delta}^{\leq d}) + \varepsilon. & (\operatorname{Since} d = \log(1/\varepsilon)/\delta) \end{aligned}$$

Similarly,

$$\mathbb{E}\left[(T^{\star}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x}))^{2}\right] \leq 2\left(\mathbb{E}\left[\left(T^{\star}(\boldsymbol{x}) - f_{\delta}(\boldsymbol{x})\right)^{2}\right] + \mathbb{E}\left[\left(f_{\delta}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x})\right)^{2}\right]\right)$$

("almost-triangle" inequality)

$$= 2\left(\mathbb{E}[\left(T^{\star}(\boldsymbol{x}) - f_{\delta}(\boldsymbol{x})\right)^{2}\right] + \sum_{|S|>d} (1-\delta)^{|S|} \widehat{f}(S)^{2}\right)$$
  
$$\leq 2\left(\mathbb{E}[\left(T^{\star}(\boldsymbol{x}) - f_{\delta}(\boldsymbol{x})\right)^{2}\right] + \varepsilon). \qquad (\text{Since } d = \log(1/\varepsilon)/\delta)$$

Combining these bounds with Equation (10), we have the following lower bound on the LHS of Equation (9):

$$\operatorname{Cov}(T^{\star}, f_{\delta}^{\leq d}) \geq \frac{1}{2} (\operatorname{Var}(f_{\delta}) - \varepsilon) - \left( 2 \mathbb{E}[\left(T^{\star}(\boldsymbol{x}) - f_{\delta}(\boldsymbol{x})\right)^{2}\right] + 2\varepsilon \right).$$
  
$$= \frac{1}{2} \operatorname{Var}(f_{\delta}) - \left( 2 \mathbb{E}[\left(T^{\star}(\boldsymbol{x}) - f_{\delta}(\boldsymbol{x})\right)^{2}\right] + \frac{5}{2}\varepsilon \right).$$
(11)

We now turn to analyzing the RHS of Equation (9):

$$k \sum_{i=1}^{n} \lambda_{i}(T^{\star}) \cdot \frac{1}{2} \mathbb{E} \left[ (f_{\delta}^{\leq d}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x}^{\sim i}))^{2} \right]$$

$$= k \sum_{i=1}^{n} \lambda_{i}(T^{\star}) \cdot \frac{1}{4} \mathbb{E} \left[ (f_{\delta}^{\leq d}(\boldsymbol{x}) - f_{\delta}^{\leq d}(\boldsymbol{x}^{\oplus i}))^{2} \right] \qquad (\boldsymbol{x}^{\oplus i} = \boldsymbol{x} \text{ with its } i\text{-th coordinate flipped})$$

$$= k \sum_{i=1}^{n} \lambda_{i}(T^{\star}) \cdot \mathbb{E} \left[ D_{i} f_{\delta}^{\leq d}(\boldsymbol{x})^{2} \right]$$

$$= k \sum_{i=1}^{n} \lambda_{i}(T^{\star}) \cdot \mathrm{Inf}_{i}(f_{\delta}^{\leq d}) \qquad (\text{Definition 2})$$

$$= k \cdot \max_{i \in [n]} \left\{ \mathrm{Inf}_{i}(f_{\delta}^{\leq d}) \right\} \cdot \sum_{i=1}^{n} \lambda_{i}(T^{\star}) \leq k \cdot \max_{i \in [n]} \left\{ \mathrm{Inf}_{i}(f_{\delta}^{\leq d}) \right\} \cdot \log s, \qquad (12)$$

where the final inequality holds because

$$\sum_{i=1}^n \lambda_i(T^\star) = \sum_{i=1}^n \Pr[T^\star \text{ queries } \boldsymbol{x}_i] = \sum_{\text{leaves } \ell \in T^\star} 2^{-|\ell|} \cdot |\ell| \le \log s.$$

Finally, we note that:

$$\begin{aligned} \operatorname{Inf}_{i}(f_{\delta}^{\leq d}) &= \sum_{\substack{S \ni i \\ |S| \leq d}} (1-\delta)^{2|S|} \widehat{f}(S)^{2} \end{aligned}$$
(Fourier formula for influence; Definition 2)  
$$&\leq \sum_{\substack{S \ni i \\ |S| \leq d}} (1-\delta)^{|S|} \widehat{f}(S)^{2} = \operatorname{Inf}_{i}^{(\delta,d)}(f). \end{aligned}$$

Combining this with Equations (9), (11) and (12) and rearranging completes the proof.  $\Box$ 

## D Proofs of Facts 4.1 and 4.2 and Propositions E.1 and E.2

*Proof of Fact 4.1.* This follows by combining the bounds  $Inf(T) \leq \log s$  (see e.g. [OS07]) and  $NS_{\delta}(f) \leq \delta \cdot Inf(f)$  for all  $f : \{\pm 1\}^n \to \{\pm 1\}$  [O'D14, Exercise 2.42].

*Proof of Fact 4.2.* Let  $x \sim \{\pm 1\}^n$  be uniform random and  $\tilde{x} \sim_{\delta} x$  be a  $\delta$ -noisy copy of x. Then

$$\begin{split} \mathrm{NS}_{\delta}(f) &= \mathrm{Pr}[f(\boldsymbol{x}) \neq f(\tilde{\boldsymbol{x}})] \\ &\leq \mathrm{Pr}[T(\boldsymbol{x}) \neq T(\tilde{\boldsymbol{x}})] + \mathrm{Pr}[T(\boldsymbol{x}) \neq f(\boldsymbol{x})] + \mathrm{Pr}[T(\tilde{\boldsymbol{x}}) \neq f(\tilde{\boldsymbol{x}})] \\ &\leq \mathrm{NS}_{\delta}(T) + 2 \, \mathrm{Pr}[T(\boldsymbol{x}) \neq f(\boldsymbol{x})], \end{split}$$

where the final inequality uses that fact that x and  $\tilde{x}$  are distributed identically.

#### E The case analysis in the proof of Theorem 4

Case 1:  $\mathbb{E}[\operatorname{Var}((f_{\ell})_{\delta})] \ge 4 \mathbb{E}_{\ell} \left[ \|(f_{\ell})_{\delta} - T_{\mathsf{opt}}^{\mathrm{trunc}}\|_{2}^{2} \right] + 7\varepsilon.$ 

In this case we claim that there is a leaf  $\ell^*$  of  $T^\circ$  with a high score, where we recall that the score of a leaf  $\ell$  is defined to be

score
$$(\ell) \coloneqq 2^{-|\ell|} \cdot \max_{i \in [n]} \left\{ \operatorname{Inf}_{i}^{(\delta,d)}(f_{\ell}) \right\}.$$

Applying Theorem 3 with its 'T<sup>\*</sup>' being  $T_{opt}^{trunc}$  and its 'f' being  $f_{\ell}$  for each leaf  $\ell \in T^{\circ}$ , we have that

$$\mathbb{E}_{\ell} \left[ \max_{i \in [n]} \left\{ \mathrm{Inf}_{i}^{(\delta,d)}(f_{\ell}) \right\} \right] \geq \frac{\frac{1}{2} \mathbb{E}_{\ell} [\mathrm{Var}(f_{\ell})_{\delta}] - \left( 2 \mathbb{E}_{\ell} \left[ \|T_{\mathsf{opt}}^{\mathrm{trunc}} - (f_{\ell})_{\delta}\|_{2}^{2} \right] + \frac{5}{2} \varepsilon \right)}{\log(s/\varepsilon) \log s} \quad (\text{Theorem 3})$$

$$\geq \frac{\varepsilon}{\log(s/\varepsilon) \log s}, \quad (13)$$

where the second inequality is by the assumption that we are in Case 1. Equivalently,

$$\sum_{\ell \in T^{\circ}} 2^{-|\ell|} \cdot \max_{i \in [n]} \left\{ \operatorname{Inf}_{i}^{\delta, d}(f_{\ell}) \right\} \geq \frac{\varepsilon}{\log(s/\varepsilon) \log s},$$

and so there must exist a leaf  $\ell^\star \in T^\circ$  such that

$$\operatorname{score}(\ell^{\star}) = 2^{-|\ell^{\star}|} \cdot \max_{i \in [n]} \left\{ \operatorname{Inf}_{i}^{(\delta,d)}(f_{\ell^{\star}}) \right\} \geq \frac{\varepsilon}{|T^{\circ}| \log(s/\varepsilon) \log s},$$

where  $|T^{\circ}|$  denotes the size of  $T^{\circ}$ .

**Case 2:** 
$$\mathbb{E}[\operatorname{Var}((f_{\ell})_{\delta})] < 4 \mathbb{E}[\|(f_{\ell})_{\delta} - T_{\mathsf{opt}}^{\mathrm{trunc}}\|_{2}^{2}] + 7\varepsilon.$$

In this case, we claim that  $\operatorname{error}_f(T_f^\circ) \leq O(\operatorname{opt}_s + \kappa + \varepsilon)$ . We will need a couple of propositions: **Proposition E.1.**  $\mathop{\mathbb{E}}_{\ell}[\|(f_{\ell})_{\delta} - f_{\ell}\|_2^2] \leq 4\kappa$ .

Proof. We first note that

$$\begin{split} \mathop{\mathbb{E}}_{\boldsymbol{\ell}} \left[ \| (f_{\boldsymbol{\ell}})_{\delta} - f_{\boldsymbol{\ell}} \|_{2}^{2} \right] &\leq 2 \mathop{\mathbb{E}}_{\boldsymbol{\ell}} \left[ \| (f_{\boldsymbol{\ell}})_{\delta} - f_{\boldsymbol{\ell}} \|_{1} \right] & (\text{Since } f_{\ell} \text{ and } (f_{\ell})_{\delta} \text{ are } [-1, 1] \text{-valued}) \\ &= 2 \mathop{\mathbb{E}}_{\boldsymbol{\ell}} \left[ \mathop{\mathbb{E}}_{\boldsymbol{x}} \left[ |(f_{\boldsymbol{\ell}})_{\delta}(\boldsymbol{x}) - f_{\ell}(\boldsymbol{x})| \right] \right] \\ &= 2 \mathop{\mathbb{E}}_{\boldsymbol{\ell}} \left[ \mathop{\mathbb{E}}_{\tilde{\boldsymbol{x}} \sim_{\delta} \boldsymbol{x}} \left[ |(f_{\boldsymbol{\ell}})(\tilde{\boldsymbol{x}}) - f_{\ell}(\boldsymbol{x})| \right] \right] \\ &= 2 \mathop{\mathbb{E}}_{\boldsymbol{\ell}} \left[ 2 \mathop{\Pr}_{\tilde{\boldsymbol{x}} \sim_{\delta} \boldsymbol{x}} \left[ f_{\boldsymbol{\ell}}(\tilde{\boldsymbol{x}}) \neq f_{\boldsymbol{\ell}}(\boldsymbol{x}) \right] \right] \\ &= 4 \mathop{\mathbb{E}}_{\boldsymbol{\ell}} \left[ \operatorname{NS}_{\delta}(f_{\boldsymbol{\ell}}) \right] = 4 \operatorname{NS}_{\delta}(f, T^{\circ}). \end{split}$$

By Fact 2.1, we have that  $NS_{\delta}(f, T^{\circ}) \leq NS_{\delta}(f)$ , and the claim follows.

**Proposition E.2.** For each leaf  $\ell \in T^{\circ}$ , we have  $\mathbb{E}\left[(f_{\ell}(\boldsymbol{x}) - \operatorname{sign}(\mathbb{E}[f_{\ell}])^2\right] \leq 2 \mathbb{E}[(f_{\ell}(\boldsymbol{x}) - c)^2]$  for all constants  $c \in \mathbb{R}$ .

*Proof.* Let  $p := \Pr[f_{\ell}(\boldsymbol{x}) = 1]$  and assume without loss of generality that  $p \ge \frac{1}{2}$ . On one hand, we have that  $\mathbb{E}\left[(f_{\ell}(\boldsymbol{x}) - \operatorname{sign}(\mathbb{E}[f_{\ell}])^2\right] = \mathbb{E}\left[(f_{\ell}(\boldsymbol{x}) - 1)^2\right] = 4(1-p)$ . On the other hand, since

$$\mathbb{E}[(f_{\ell}(\boldsymbol{x}) - c)^2] = p(1 - c)^2 + (1 - p)(1 + c)^2$$

this quantity is minimized for c = 2p - 1 and attains value 4p(1 - p) at this minimum. Therefore indeed

$$\min_{c} \left\{ \mathbb{E}[(f_{\ell}(\boldsymbol{x}) - c)^2] \right\} = 4p(1-p) \ge 2(1-p) = \frac{1}{2} \mathbb{E}\left[ (f_{\ell}(\boldsymbol{x}) - \operatorname{sign}(\mathbb{E}[f_{\ell}])^2 \right]$$

and the proposition follows.

With Propositions E.1 and E.2 in hand, we are ready to bound  $\operatorname{error}_f(T_f^\circ)$ . Recall that  $T_f^\circ$  is the completion of  $T^\circ$  that we obtain by labeling each leaf  $\ell$  with  $\operatorname{sign}(\mathbb{E}[f_\ell])$ . Therefore,

$$\operatorname{error}_{f}(T_{f}^{\circ}) = \underset{\ell}{\mathbb{E}} \left[ \operatorname{dist}(f_{\ell}, \operatorname{sign}(\mathbb{E}[f_{\ell}])) \right]$$
$$= \frac{1}{4} \underset{\ell}{\mathbb{E}} \left[ \|f_{\ell} - \operatorname{sign}(\mathbb{E}[f_{\ell}])\|_{2}^{2} \right]$$
$$\leq \frac{1}{2} \underset{\ell}{\mathbb{E}} \left[ \|f_{\ell} - \mathbb{E}[(f_{\ell})_{\delta}]\|_{2}^{2} \right]$$
$$\leq \underset{\ell}{\mathbb{E}} \left[ \|f_{\ell} - (f_{\ell})_{\delta}\|_{2}^{2} \right] + \underset{\ell}{\mathbb{E}} \left[ \|(f_{\ell})_{\delta} - \mathbb{E}[(f_{\ell})_{\delta}]\|_{2}^{2} \right]$$
$$\leq 4\kappa + \underset{\ell}{\mathbb{E}} [\operatorname{Var}((f_{\ell})_{\delta})] \qquad (\operatorname{Proposition E.1})$$

By the assumption that we are in Case 2, we have that:

$$\begin{split} \mathbb{E}_{\boldsymbol{\ell}}[\operatorname{Var}((f_{\boldsymbol{\ell}})_{\delta})] &< 4 \mathbb{E}_{\boldsymbol{\ell}}\left[ \|(f_{\boldsymbol{\ell}})_{\delta} - T_{\mathsf{opt}}^{\mathrm{trunc}}\|_{2}^{2} \right] + 7\varepsilon \\ &\leq 8 \Big( 4\kappa + \mathbb{E}_{\boldsymbol{\ell}}\left[ \|f_{\boldsymbol{\ell}} - T_{\mathsf{opt}}^{\mathrm{trunc}}\|_{2}^{2} \right] \Big) + 7\varepsilon \end{split}$$
(Proposition E.1)  
$$&= 8 \Big( 4\kappa + 4 \mathbb{E}_{\boldsymbol{\ell}}\left[ \operatorname{dist}(f_{\boldsymbol{\ell}}, T_{\mathsf{opt}}^{\mathrm{trunc}}) \right] \Big) + 7\varepsilon \\ &= 8 \Big( 4\kappa + 4 (\operatorname{opt}_{s} + \varepsilon) \Big) + 7\varepsilon \\ &\leq O(\operatorname{opt}_{s} + \kappa + \varepsilon). \end{split}$$

and so we have shown that  $\mathrm{error}_f(T_f^\circ) \leq O(\mathsf{opt}_s + \kappa + \varepsilon).$