

Exhibit 176

CONFIDENTIAL

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No.

IN RE: SOCIAL MEDIA ADOLESCENT 4:22-MD-03047-YGR
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

This Document Relates To:

ALL ACTIONS

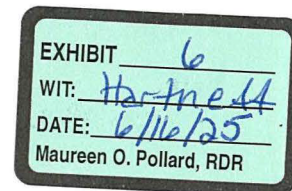
CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF
ALLISON L. HARTNETT

Held At: Covington & Burling LLP
Salesforce Tower
4415 Mission Street
San Francisco, California

June 16th, 2025
9:59 a.m.

Reported By:
MAUREEN O. POLLARD, CSR #14449, RDR



I. **Collection, Use, and Disclosure of User Data (Topics 2(a), 2(b))**

A. **SME: [REDACTED] (Advertising)**

- Privacy Policy: how data collected is used for advertising purposes
 - Privacy policy does not make a distinction between teens and adults on this point
 - Meta provides clarification on additional limitations for teen users in the privacy center that says that the only data we use for teens in ads are age and location. This is not included in the policy.
 - Categories of data that are addressed in the privacy policy as data we use to show ads
 - Profile information
 - Activity off our products
 - Content that you create across the app
 - Inferences
 - Meta uses stated age to target ads to users
 - Information we share with 3rd parties is aggregate, anonymized reporting data eg: total impressions an ad got from 13-17 year olds
- Data use and targeting restrictions on Youth Ads
 - Delivery means what we do to show an ad - most of the time this term refers to Ranking
 - Targeting refers to an advertiser selecting their audience
 - For BAY, options that advertisers have for targeting are minimal. In BAY, you can only choose age and city-level or higher location.
 - Pre-2021, Youth Ads used all data sources but had content restrictions for youth (eg: alcohol, gambling). All users including teens had the ability to opt out of the use of 3P data.
 - 2020-2021 time period, Meta began to look at a different approach for Youth Ads targeting. With GDPR, we introduced low-data use ads types in Europe for certain teens. In 2021, other laws passed that required that we did not create a "profile" of a teen (ie, the company may not use data to create a prediction of a teen's interests for advertising purposes) and Meta therefore decided to launch the low-data version globally to U18.
 - Slimmed Down Services - SDS. Teens were defaulted into the setting where 3P data was off for ranking, targeting and delivery use cases. Targeting was only on age, gender, city-level or higher location. Launched in Sep 2021.
 - Basic Ads Youth Tier: Announced in Jan 2023. Began to make advertiser side changes. Started rolling out in March 2023 to users. Launch

- Underage checkpoint was logged in, if they were logged in, they could submit an ID and when the appeal is successful they were given logged in Delta experience.
- This was just on IG.
- Reports of 600K users over the course of a few hours from this type of attack.
- There were 2 or 3 large scripting attacks like this that happened before we introduced friction.
- The scripting attacks were fixed in part by moving to IG UFAC so it was a logged in experience (2022).
- Scripting attacks were not the only type of form abuse:
 - Eg: celebrities / influencers frequent target of underage reporting
 - Legacy checkpoint experience on IG. In order to appeal, you were provided a contact form that you had to fill out. Before the migration to UFAC happened, that form was also subject to abuse as well. Attacker would submit an appeal with an ID that was underage on purpose to make sure the account was down forever.

C. SME: [REDACTED] (2021 Backlog)

- Background
 - Jan 2021: Increase of FB and IG jobs because of more accounts being created overall and raters being sent home due to Covid
 - Flows that go to human review:
 - Edit DOB: When a user requests to change Edit DOB.
 - There was discrepancy between IG and FB:
 - On IG, you could not select a birthdate under 13 because that does not meet TOS
 - On FB, when you edit DOB you can put your age as U13 so Edit DOB queue needs U13.
 - Experience was standardized to include ability to put a U13 birthdate
 - U13 reporting: User account is placed in underage human review queue. Account if believed to be U13 is checkpointed.
 - U13 checkpoint appeal queue is a separate queue
 - Volume of backlog:
 - 2.3M reports across all three queues Jan 2021. Peaked at 2.7M in April 2021.
 - Backlog was outpacing Meta's capacity to review because there continued to be incoming demand.
- Meta's efforts to reduce backlog

- In initial testing period, Yoti adult unblock rate was 54% for Yoti compared to 78% for IDV and 48% for social vouching.
- Yoti published data on “mean average error” Yoti provides estimates of how off their age predictions are for certain users. For 6-12 years, they report 1.56 mean average error. Meta does not affirmatively leverage Yoti’s technology to identify U13s nor can any checkpointed user identified as U13 use Yoti FBAP to get back on to the platform.
- However, Meta checkpoints any users predicted by Yoti to be U13. They then need to use IDV to regain access.
- For 13-19, mean average error is 1.52 years.
- Post rollout of Yoti:
 - Since 2022, we have continually monitored block and unblock rates to ensure consistency.
 - To do this we leverage labeled birthday posts for ground truth to evaluate rate at which Yoti blocks users who are actually U18 or unblocks who are actually O18.
 - Meta does not internally test Yoti’s accuracy or effectiveness in identifying U13s as that is not the use case we leverage it for.
- Broader age verification usage and use cases
 - Beginning in Dec 2022, Meta began rolling out the age verification options (IDV, FBAP) to verify users in some situations where users were predicted to be U18 but Meta wanted to gate the product to O18: Dec 2022 for FB Gating, FB Marketplace Oct 2024.

C. SME: [REDACTED] (Age Gate; Block Enforcement)

- History of age gating at signup
 - FB implemented age gating at signup at least prior to 2009. We maintained 10 different versions of the registration flow throughout the 2010s depending on which interface the user was employing. Age collection was different on each flow.
 - In 2019, we began to explore not defaulting to a certain age on FB. The pattern we had landed on prior was today’s date minus 25 years - this was a 2017 launch. This format was helping users on bad phones who could not use a scroll.