

Exhibit 17

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

PEOPLE OF THE STATE OF CALIFORNIA,
et al.,
Plaintiffs,

v.

META PLATFORMS, INC, Instagram, LLC,
Meta Payments, Inc., Meta Platforms
Technologies, LLC., et al.,
Defendants

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:
4:23-cv-05448

MDL No. 3047

Case No. 4:23-cv-05448-YGR

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**CORRECTED TRIAL REPORT OF PATRICK MCDANIEL
DECEMBER 15, 2025**

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“creator_rid_hashed”, “entity_id_hashed”, “entity_rid_hashed”, and “owner_rid_hashed”). In this way, such “Candidate IDs” are not checkpointed, not enforced, and have not had an enforcement propagated to them (and therefore, are currently allowed to remain on Meta’s platforms).

281. Finally, I verified that at least one of the IDs³⁸⁶ in the pair had a US jurisdiction³⁸⁷(via “enrollment_conformed_entity_dimensions.jurisdictions” in Very Recent Checkpointing Table for Disabled IDs and via Softmatch Jurisdiction Table for Candidate IDs). I call such IDs “Unenforced IDs” as they represent IDs that are not enforced or checkpointed, but are soft-matched (over a threshold) to an ID that was disabled for being underage, and either has a US jurisdiction or is soft-matched to an ID that does. Finally, across all pairs with an Unenforced ID, I computed the number of unique Unenforced and Disabled IDs. Below are tables that show the results of the filters described above for each of Meta’s soft-match models.

Table	Softmatch Pairs	Pairs over Threshold	Pairs with a Disabled Account	Unenforced Softmatch Pairs	Unenforced Accounts	Disabled Accounts
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³⁸⁶ Note that Meta described Very Recent Checkpointing Table as “data relating to U.S. Facebook and Instagram accounts.” Accordingly, I consider these users to be US users. See 2025.08.15 Meta Ltr. re META3047MDL_VOL270.pdf. However, I observed that some of these users had values in the subfield “jurisdictions” from the field “enrollment_conformed_entity_dimensions” indicating foreign geography and thus, to be conservative, I filtered them out in my analysis per these steps.

³⁸⁷ I performed this check for IG-to-IG Softmatch Table and FB-to-IG Softmatch Table. FB-to-FB Clustering Table has a “country” field which is “US” for >99.95% of rows.

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FB-to-FB Clustering Table	176,564,405	176,564,405	31,476	30,811	15,748	13,106
FB-to-IG Softmatch Table	2,999,628,582	1,282,987,972	57,202	49,483	47,748	21,797
IG-to-IG Softmatch Table	4,613,904,488	2,734,812,541	125,499	119,095	72,320	18,397

Table 57 - Soft-match Analysis Results

282. Moreover, below are tables of the state-level jurisdictions of Disabled Accounts.

FB-to-FB Clustering Table Disabled Account Jurisdictions	Count
US	1,837
US AK	38
US AL	191
US AR	114
US AZ	455
US CA	1,215
US CO	164
US CT	65
US DC	29
US DE	27
US FL	497
US GA	308
US HI	39
US IA	115
US ID	45
US IL	261
US IN	273
US KS	108
US KY	270
US LA	148
US MA	251
US MD	137
US ME	49
US MI	273
US MN	160
US MO	198
US MS	125
US MT	27
US NC	318
US ND	36
US NE	69
US NH	35
US NJ	151
US NM	59
US NV	68
US NY	1,224
US OH	397
US OK	135

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US_OR	191
US_PA	365
US_RI	17
US_SC	180
US_SD	25
US_TN	268
US_TX	682
US_UT	73
US_VA	613
US_VT	26
US_WA	395
US_WI	199
US_WV	134
US_WY	27

Table 58 - FB-to-FB Clustering Table Disabled Accounts by State

FB-to-IG Softmatch Table Disabled Account Jurisdictions	Count
US	1,174
US_AK	43
US_AL	413
US_AR	210
US_AZ	474
US_CA	2,426
US_CO	289
US_CT	163
US_DC	53
US_DE	66
US_FL	1,522
US_GA	939
US_HI	130
US_IA	143
US_ID	82
US_IL	642
US_IN	384
US_KS	196
US_KY	338
US_LA	484
US_MA	301
US_MD	437
US_ME	53
US_MI	526
US_MN	266
US_MO	327
US_MS	276
US_MT	50

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US_NC	770
US_ND	44
US_NE	118
US_NH	50
US_NJ	548
US_NM	97
US_NV	239
US_NY	1,088
US_OH	735
US_OK	261
US_OR	145
US_PA	701
US_RI	54
US_SC	377
US_SD	32
US_TN	553
US_TX	2,060
US_UT	165
US_VA	525
US_VT	23
US_WA	376
US_WI	308
US_WV	93
US_WY	28

Table 59 - FB-to-IG Softmatch Clustering Table Disabled Accounts by State

IG-to-IG Softmatch Table Disabled Account Jurisdictions	Count
US	1,093
US_AK	18
US_AL	289
US_AR	115
US_AZ	366
US_CA	2,394
US_CO	211
US_CT	128
US_DC	82
US_DE	62
US_FL	1,339
US_GA	904
US_HI	124
US_IA	67

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US_ID	63
US_IL	589
US_IN	250
US_KS	119
US_KY	198
US_LA	430
US_MA	254
US_MD	436
US_ME	26
US_MI	422
US_MN	177
US_MO	220
US_MS	211
US_MT	33
US_NC	592
US_ND	25
US_NE	69
US_NH	34
US_NJ	565
US_NM	80
US_NV	245
US_NY	946
US_OH	521
US_OK	147
US_OR	90
US_PA	563
US_RI	43
US_SC	304
US_SD	17
US_TN	380
US_TX	2,020
US_UT	145
US_VA	433
US_VT	12
US_WA	268
US_WI	227
US_WV	42
US_WY	9

Table 60 - IG-to-IG Softmatch Table Disabled Accounts by State

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283. This analysis shows the ability of Meta’s soft-matching models to identify accounts likely to belong to underage users whose accounts Meta has not removed from its platforms. With underage enforcement data from only a three-month period, I found tens of thousands of accounts that Meta had disabled for being underage, which Meta’s systems predicted were linked to tens of thousands more accounts that Meta ignored. This demonstrates a missed opportunity for Meta to use its existing data to detect and remove underage users.

284. **Q2. How many estimated accounts would be disabled by Meta if it had propagated soft-link enforcements for underage accounts?**

285. This question asks how many underage accounts Meta could have disabled for being soft-matched to an account that was disabled for being underage, if Meta enforced its age policies against soft-matched accounts.

286. I estimate the number of accounts Meta would have disabled by considering the percentage of potential enforcements that are due to soft-matching and multiply this percentage by the total number of enforcements in the past (using a similar methodology as my analysis of possible hard-link enforcements). I define a “soft-match” enforcement to be semantically identical to a hard-link enforcement: an account that is soft-matched to another account that was disabled to be underage. In other words, I consider

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the number of “Disabled Accounts” computed above when computing the percentage of soft-match enforcements. I assume that soft-matching rates are relatively consistent before April 2025, the earliest date for which Meta produced soft-matching data.

287. Next, below is a table that contains a summary of the percentages that I used to provide my estimates.

Soft-match Table	% Disables	% Enforcements
FB-to-FB Clustering Table	3.0%	0.7%
FB-to-IG Softmatch Table	5.0%	1.1%
IG-to-IG Softmatch Table	4.2%	0.9%

Table 61 - Soft-match Percentages for each Table

288. Below is a table containing the estimated number of potential accounts that could have been disabled or subject to enforcement through soft-matching on a monthly basis for Table 3 and Checkpointing Table. These figures were derived by multiplying the total number of underage account disables or enforcements per month by the respective percentages displayed above.

Month	Total Disables	Est. Number of Soft-match Disables via FB-to-FB Clustering Table	Est. Number of Soft-match Disables via FB-to-IG Softmatch Table	Est. Number of Soft-match Disables via IG-to-IG Softmatch Table
2020-06-01	826	24	41	34
2020-07-01	1,717	51	85	72
2020-08-01	7,533	226	377	318
2020-09-01	143,515	4,321	7,187	6,066
2020-10-01	22,954	691	1,149	970
2020-11-01	22,015	662	1,102	930
2020-12-01	27,598	831	1,382	1,166
2021-01-01	40,441	1,217	2,025	1,709
2021-02-01	26,866	809	1,345	1,135
2021-03-01	25,209	759	1,262	1,065
2021-04-01	20,222	608	1,012	854
2021-05-01	25,770	776	1,290	1,089
2021-06-01	33,344	1,004	1,669	1,409
2021-07-01	52,135	1,569	2,611	2,203
2021-08-01	34,860	1,049	1,745	1,473

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2021-09-01	31,596	951	1,582	1,335
2021-10-01	31,660	953	1,585	1,338
2021-11-01	17,353	522	869	733
2021-12-01	10,628	320	532	449
2022-01-01	10,537	317	527	445
2022-02-01	10,690	321	535	451
2022-03-01	29,821	898	1,493	1,260
2022-04-01	21,649	651	1,084	915
2022-05-01	128,304	3,863	6,425	5,423
2022-06-01	79,854	2,404	3,999	3,375
2022-07-01	35,057	1,055	1,755	1,481
2022-08-01	28,636	862	1,434	1,210
2022-09-01	42,848	1,290	2,145	1,811
2022-10-01	35,176	1,059	1,761	1,486
2022-11-01	60,005	1,806	3,005	2,536
2022-12-01	22,196	668	1,111	938
2023-01-01	12,328	371	617	521
2023-02-01	4,118	124	206	174
2023-03-01	3,705	111	185	156
2023-04-01	1,523	45	76	64
2023-05-01	131,675	3,965	6,594	5,565
2023-06-01	29,230	880	1,463	1,235
2023-07-01	32,447	977	1,625	1,371
2023-08-01	31,388	945	1,571	1,326
2023-09-01	15,970	480	799	675
2023-10-01	16,489	496	825	696
2023-11-01	36,871	1,110	1,846	1,558
2023-12-01	28,333	853	1,418	1,197
2024-01-01	26,939	811	1,349	1,138
2024-02-01	24,005	722	1,202	1,014
2024-03-01	103	3	5	4
Total	1,476,139	44,430	73,905	62,373

Table 62 - Estimated Number of Account Disables due to Soft-matching per Month

Month	Total Enforcements	Est. Number of Soft-match Enforcements via FB-to-FB Clustering Table	Est. Number of Soft-match Enforcements via FB-to-IG Softmatch Table	Est. Number of Soft-match Enforcements via IG-to-IG Softmatch Table
2017-10-01	1,258	8	14	11
2017-11-01	2,431	16	27	22
2017-12-01	57	0	0	0
2018-01-01	50	0	0	0
2018-02-01	61	0	0	0
2018-03-01	112	0	1	1
2018-04-01	164	1	1	1
2018-05-01	161	1	1	1
2018-06-01	16,630	111	185	156
2018-07-01	368	2	4	3
2018-08-01	302	2	3	2
2018-09-01	341	2	3	3
2018-10-01	294	1	3	2
2018-11-01	479	3	5	4
2018-12-01	677	4	7	6
2019-01-01	602	4	6	5
2019-02-01	674	4	7	6
2019-03-01	2,140	14	23	20
2019-04-01	1,446	9	16	13
2019-05-01	1,514	10	16	14

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2019-06-01	1,772	11	19	16
2019-07-01	2,586	17	28	24
2019-08-01	2,936	19	32	27
2019-09-01	1,949	13	21	18
2019-10-01	2,109	14	23	19
2019-11-01	2,934	19	32	27
2019-12-01	3,839	25	42	36
2020-01-01	5,753	38	64	54
2020-02-01	7,166	48	80	67
2020-03-01	19,729	132	220	186
2020-04-01	12,051	80	134	113
2020-05-01	13,914	93	155	131
2020-06-01	12,648	85	141	119
2020-07-01	11,993	80	134	113
2020-08-01	10,534	70	117	99
2020-09-01	9,684	65	108	91
2020-10-01	44,247	297	494	417
2020-11-01	6,862	46	76	64
2020-12-01	30,739	206	343	290
2021-01-01	34,453	231	385	325
2021-02-01	39,960	268	446	377
2021-03-01	48,618	326	543	458
2021-04-01	31,562	212	352	297
2021-05-01	23,908	160	267	225
2021-06-01	26,932	181	301	254
2021-07-01	46,378	311	518	437
2021-08-01	90,693	609	1,013	855
2021-09-01	86,429	580	966	815
2021-10-01	45,179	303	505	426
2021-11-01	42,529	285	475	401
2021-12-01	35,348	237	395	333
2022-01-01	28,141	189	314	265
2022-02-01	39,794	267	444	375
2022-03-01	65,126	437	728	614
2022-04-01	52,095	350	582	491
2022-05-01	175,801	1,181	1,965	1,658
2022-06-01	561,345	3,773	6,275	5,296
2022-07-01	106,006	712	1,185	1,000
2022-08-01	92,911	624	1,038	876
2022-09-01	64,315	432	718	606
2022-10-01	77,752	522	869	733
2022-11-01	52,925	355	591	499
2022-12-01	84,229	566	941	794
2023-01-01	54,158	364	605	510
2023-02-01	44,604	299	498	420
2023-03-01	35,620	239	398	336
2023-04-01	35,158	236	393	331
2023-05-01	49,713	334	555	469
2023-06-01	44,567	299	498	420
2023-07-01	45,649	306	510	430
2023-08-01	29,974	201	335	282
2023-09-01	21,788	146	243	205
2023-10-01	91,091	612	1,018	859
2023-11-01	28,387	190	317	267
2023-12-01	38,384	257	429	362
2024-01-01	42,163	283	471	397
2024-02-01	48,196	323	538	454
2024-03-01	47,081	316	526	444
2024-04-01	11,434	76	127	107

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2024-05-01	10,116	67	113	95
2024-06-01	12,132	81	135	114
2024-07-01	26,353	177	294	248
2024-08-01	40,098	269	448	378
2024-09-01	41,618	279	465	392
2024-10-01	25,054	168	280	236
2024-11-01	25,742	173	287	242
2024-12-01	24,117	162	269	227
2025-01-01	19,016	127	212	179
2025-02-01	11,987	80	133	113
2025-03-01	3,592	24	40	33
Total	3,093,427	20,749	34,538	29,141

Table 63 - Estimated Number of Enforcements Due to Soft-matching per Month

289. This analysis represents an estimate of the magnitude of additional underage accounts that Meta could have detected by using its soft-matching techniques over the period for which Meta had produced data on underage enforcements. Based on the available data, I estimate that Meta could have detected tens of thousands of additional underage accounts on Facebook and Instagram, if it had queried its soft-matching data, as has done for years for disabling accounts for other types of policy violations or for commercial purposes.

5.5.7 Results on Potential Bot/Scripting Attacks

290. This analysis of Meta's productions focuses on detecting the presence of bot attacks on underage reports. This section relies on Table 1 and Table 2. Throughout this section, I apply the same underage (but not geographic) filters described above.

291. **Q1: What is the reporting load on Meta's systems?**

292. This question asks about the number of reports Meta has received over time.

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293. Below is a figure that shows the daily number of reports Meta has received via Table 1 and Table 2. The x-axis represents the date and the y-axis shows the number of reports received on a given day. The tables are differentiated by hue. As the graph shows, there is a large influx of reports near the end of 2021. I analyze this phenomenon subsequently. The range of dates from Meta’s reporting tables (for underage reports) span from 2015-06-05 to 2024-12-11.

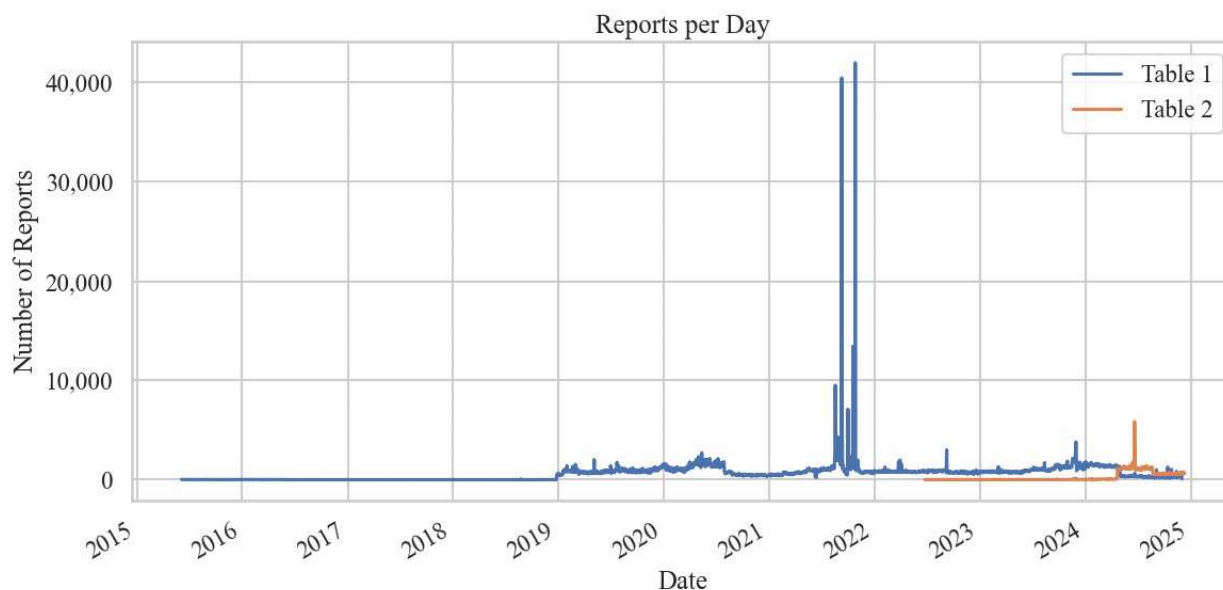


Figure 7 - Number of Reports on a Daily Basis

294. **Q2: To what degree are accounts targeted for being reported as underage?**

295. This question asks about the maximal “fan-in” rate for reporters reporting accounts. Said alternatively, how many accounts are reported by multiple reporters?

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296. To identify users, I use the same fields as used prior: “deprecated_responsible_id_hashed”, “entity_attr_id_hashed”, “entity_attr_id_rid_hashed”, “object_id_hashed”, “object_id_v1_hashed”, “object_rid_hashed”, and “responsible_rid_hashed” for Table 1 and “entity_attr_entity_rid_hashed” and “entity_attr_primary_profile_id_hashed” in Table 2. To identify reporters, the fields “deprecated_reporter_id_hashed” and “reporter_rid_hashed” refer to accounts that submitted the report in Table 1.³⁸⁸ Conversely, the field “interactor_attr_interactor_rid_hashed” refers to accounts that submitted a report in Table 2.³⁸⁹

297. Next, I measured the number of accounts that only received one report (using the ID field that was most populated). Below is a table showing the number of accounts that receive one, two to thirty, or greater than thirty reports (and the volume of reports they constitute). A large proportion of accounts only receive one report (and constitute over half of all reports received by Meta).

Table	Receive <2 Reports	Receive 2-29 Reports	Receive ≥30 Reports
Table 1	1,291,127 IDs (88.4%), 1,291,127 Reports (61.5%)	167,034 IDs (11.4%), 626,807 Reports (29.9%)	2,554 IDs (0.2%), 179,944 Reports (8.6%)
Table 2	142,745 IDs (87.0%), 142,745 Reports (62.8%)	21,099 IDs (12.9%), 70,951 Reports (31.2%)	172 IDs (0.1%), 10,642 Reports (4.7%)

Table 64 - Number of Accounts that Receive N Reports

298. **Q3: To what degree are reporters submitting underage reports?**

³⁸⁸ Ashley Simonsen, Corrected Meta Ltr re META3047MDL_VOL245, Ltr from Counsel for Meta to Counsel of Record (Oct. 6, 2025), at 3.

³⁸⁹ Id. at 5.

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299. This question asks about the maximal “fan-out” rate for reporters reporting accounts. Said alternatively, how many reporters are submitting reports against multiple accounts?

300. Using the same fields and approach described above, I now measure the number of reporters who only file one report (again, using the ID field that is most populated). Below is a table showing the number of reporters that submit one, two to thirty, or greater than thirty reports (and the volume of reports they constitute). A large proportion of reporters only submit one report (note that the percentages of reports submitted do not always add up to 100% as roughly 10%-30% of reports do not have an ID, depending on the table).

Table	Submit <2 Reports	Submit 2-29 Reports	Submit ≥30 Reports
Table 1	391,563 IDs (77.3%), 391,563 Reports (18.7%)	113,651 IDs (22.4%), 371,653 Reports (17.7%)	1,336 IDs (0.3%), 666,515 Reports (31.8%)
Table 2	127,378 IDs (85.4%), 127,378 Reports (56.0%)	21,589 IDs (14.5%), 69,190 Reports (30.4%)	212 IDs (0.1%), 23,008 Reports (10.1%)

Table 65 - Number of Reporters that Submit N Reports

301. **Q4: To what degree are there coordinated attacks?**

302. This question asks whether there are periods in which Meta receives a large volume of reports in a short period of time (i.e., a “burst”).

303. To identify such bursts, I measured the number of reports received per day (using the field “first_create_timestamp”, as used prior). Next, I computed a rolling seven-day window of the mean and standard deviation of reports received per day. Finally, I define a day to be a “burst” if the number of reports

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on that day: (1) is at least 6,000³⁹⁰, and (2) exceeds the mean plus two times the standard deviation of the rolling window, which is common practice in my field.³⁹¹ Throughout the duration of the reporting data, I analyzed each burst and found five potential attack windows (each lasting roughly 1-2 days), all within August through October, 2021. The table below shows the number of reports received per day with the five attack windows highlighted in yellow.

Day	Number of Reports
2021-08-15	1,463 (<0.1%)
2021-08-16	2,451 (<0.1%)
2021-08-17	2,753 (<0.1%)
2021-08-18	9,474 (<0.1%)
2021-08-19	4,510 (<0.1%)
2021-08-20	1,947 (<0.1%)
2021-08-21	1,939 (<0.1%)
2021-09-05	1,471 (<0.1%)
2021-09-06	1,683 (<0.1%)
2021-09-07	1,727 (<0.1%)
2021-09-08	24,825 (0.8%)
2021-09-09	40,365 (1.2%)
2021-09-10	9,601 (<0.1%)
2021-09-11	4,051 (<0.1%)
2021-09-28	470 (<0.1%)
2021-09-29	1,225 (<0.1%)
2021-09-30	2,193 (<0.1%)
2021-10-01	7,061 (<0.1%)
2021-10-02	2,239 (<0.1%)
2021-10-03	1,322 (<0.1%)
2021-10-04	1,111 (<0.1%)
2021-10-15	1,525 (<0.1%)
2021-10-16	1,214 (<0.1%)
2021-10-17	1,228 (<0.1%)
2021-10-18	13,368 (<0.1%)
2021-10-19	1,258 (<0.1%)
2021-10-20	1,611 (<0.1%)
2021-10-21	1,115 (<0.1%)
2021-10-23	1,222 (<0.1%)

³⁹⁰ This threshold was included in the methodology because the data produced by Meta can sometimes be incredibly sparse (i.e., tens or hundreds of reports) for underage reports on certain days. I observed that this threshold captured attack windows that I would consider to be plausible, given Meta documents on attacks. That is, Meta has characterized receiving “~10k reports per day” as baseline behavior with attacks producing an additional “200K in the past 30 days”, with total report counts reaching “2.3M all in one day.” See META3047MDL-065-000002 at -905 and META3047MDL-111-00006892. Thus, 6,000 reports in one day represents a conservative estimate of what Meta may consider to be an attack.

³⁹¹ C. Wang et al., Statistical techniques for online anomaly detection in data centers; 12th IFIP/IEEE International Symposium on Integrated Network Management (IM 2011) 385-392, <https://doi.org/10.1109/INM.2011.5990537>.

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349. Meta’s Potential Use of Soft-Matching

350. Meta has not used soft-matching to detect underage users.⁴⁶² Thus, even when an account has been: (a) reported as underage, (b) placed into an age-verification checkpoint, (c) disabled following that checkpoint, and (d) soft-matched with active accounts, the accounts that would be soft-matched to it are allowed to remain active without additional scrutiny or enforcement.⁴⁶³ Meta’s internal documents stated that “[i]t is difficult to defend the use of inferred account links for advertising purposes without also using these links for age management.”⁴⁶⁴

351. The analytical question in this section is therefore whether, and to what extent, Meta’s soft-match data could have identified additional under-13 accounts linked to those already confirmed as ineligible. Based on my review of Meta’s tables and match probabilities, soft-match relationships appear frequently and with high confidence.

352. I examined data that Meta produced from three existing data tables. Each of these tables records the predictions of a different “SUMA” model that Meta uses for integrity purposes.⁴⁶⁵ The three tables represent data for models for soft-matching Instagram accounts to Instagram accounts (IG-IG below),

⁴⁶² Hartnett Dep. at 226:7-227:9.

⁴⁶³ Hartnett Dep. at 226:7-227:9.

⁴⁶⁴ Hartnett Dep. Ex. 27 at META3047MDL-050-00014485.

⁴⁶⁵ Blanaru Dep. 17:12-21.

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Facebook to Instagram (FB-IG), and Facebook to Facebook (FB-FB). Specifically, each of these models produced daily predictions of all soft-match connections for all accounts on the respective Meta platforms.⁴⁶⁶ Meta produced data representing model predictions from four days for each model for a period of approximately two months for IG-IG and three months for FB-IG and FB-FB. Detailed in Section 5, I performed an analysis projecting the number of accounts that would be disabled via soft-matching with another account that had been disabled for being underage. This analysis showed that for the four days, as many as 73,426 accounts would be disabled for IG-IG, 48,326 for FB-IG, and 15,748 for FB-FB.

8.2 META’S FAILURE TO APPLY SOFT-MATCHING SIGNIFICANTLY REDUCES THE EFFECTIVENESS OF UNDERAGE ACCOUNT DETECTION

353. From a security perspective, Meta’s decision not to apply its soft-matching capability to underage account detection represents a significant missed opportunity. The soft-matching system is already operational, has demonstrated high precision, and is used for other high-stakes enforcement actions such as terrorism, child safety, fraud, and scams.⁴⁶⁷ Applying it to the under-13 context would provide an immediate, highly efficient method for identifying additional ineligible accounts, including those created by users

⁴⁶⁶ Correspondence from Phil Irwin, outside counsel for Meta, Covington & Burling, at 2 (April 18, 2025).

⁴⁶⁷ Hartnett Dep. 295:14-296:22.