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Exhibit A

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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

TRIAL REPORT OF ADAM L. ALTER, PH.D.
August 1, 2025

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186. On other occasions, Meta employees expressed frustration about the company's slow response or underinvestment in well-being initiatives or research. One such instance was the company's response to the death of 14-year-old [REDACTED], who had died in 2017 from an act of self-harm after saving, liking, or sharing 2,100 Instagram posts related to suicide, self-harm, and depression.⁴⁰⁵ In an email chain, one Meta employee who worked in content policy, [REDACTED],⁴⁰⁶ noted that it took too long to get a policy change in response, and Nick Clegg agreed, stating, "I pretty well had to yell at a room full of senior FB folks before we got some movement."⁴⁰⁷

187. These internal discussions highlight two important points: First, that Meta was aware of the serious health and safety risks its platforms posed to users; and second, that employees were urging the company from within to accept that it would have to take business risks or incur financial losses if it wanted to prioritize health and safety. Meta's choice to allow profit motives to supersede user welfare appear to have frustrated a number of its own employees and indicate that the company was not in fact treating user safety as its top priority.

e. Internal evidence that Meta "deprioritized," under-funded, or shut down teams and initiatives designed to understand and improve user well-being.

188. Internal communications and testimony indicate that Meta could have done more to prioritize tools designed to improve user well-being. For example, George Volichenko, a former data scientist at Instagram, testified that he left the company, in part, because the well-being

⁴⁰⁵ Milmo, Dan, Sept. 30, 2022, "The bleakest of worlds: how [REDACTED] fell into a vortex of despair on social media," *The Guardian*, <https://www.theguardian.com/technology/2022/sep/30/how-molly-russell-fell-into-a-vortex-of-despair-on-social-media/>.

⁴⁰⁶ Deposition of Nick Clegg, March 20, 2025, 66:4-25.

⁴⁰⁷ Deposition of Nick Clegg, March 20, 2025, Exhibit 6, at 1. See also META3047MDL-040-00317980, "Re: Time Well Spent Approach: FB v IG," July 31, 2018.

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team's "hands were tied" regarding what they were licensed to accomplish.⁴⁰⁸

189. In his deposition, Mr. Zuckerberg acknowledged that Meta has in the past adopted a "lockdown sprint" protocol, during which teams could be reassigned or asked to focus intensely on completing a particular project.⁴⁰⁹ These lockdowns were enacted for both the launch of Instagram Live and an initiative to increase user growth to 400,000 new users a day—both of which were focused on increasing user engagement.⁴¹⁰ Notably, it appears that Instagram Live was released on April 6, 2016, just two months after the lockdown proposal.⁴¹¹ These timelines and responses to these projects stand in stark contrast to the protracted timelines and unheeded requests for additional staff on a variety of well-being products and research. For example, multiple initiatives that promised to increase well-being experienced significant delays in implementation. Quiet Mode, an option to turn off notifications, was first discussed in 2017, but was not launched until January 2023, more than five years later.⁴¹² Hiding like counts was first discussed in December 2017, and an opt-in version of the feature was finally launched over three years later, on May 26, 2021.⁴¹³ Finally, Take a Break was first discussed in May 2017, but only launched over four years later, on December 7, 2021.⁴¹⁴ These delays, which stand in stark contrast to the rapid progress Meta demonstrated when pursuing its financial objectives, are inconsistent with Meta's claim that well-being was among the company's top priorities, and that it would sacrifice profits for user welfare.

190. Furthermore, Meta knowingly understaffed teams that were focused on well-being while

⁴⁰⁸ Deposition of George Volichenko, December 16, 2024, 160:9–163:7.

⁴⁰⁹ Deposition of Mark Zuckerberg, March 27, 2025, 342:17-20, 347:10-11.

⁴¹⁰ *See generally* Deposition of Mark Zuckerberg, March 27, 2025, 336:2-364:6; Exhibits 48 and 49.

⁴¹¹ Deposition of Mark Zuckerberg, March 27, 2025, 347:19, 348:11.

⁴¹² Deposition of Mark Zuckerberg, March 27, 2025, 368:8-17, 370:9-18.

⁴¹³ Deposition of Mark Zuckerberg, March 27, 2025, 373:16-374:21, 375:10-25.

⁴¹⁴ Deposition of Mark Zuckerberg, March 27, 2025, 380:14-21, 381:13-22.

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device's operating system.⁸²⁷ Additionally, Meta's policy team recommended that the company try to show that it was developing products appropriate for minors and that it be explicit that age modeling was not reliable for "hard" enforcement (i.e., the removal of underage users).⁸²⁸

d. Meta's enforcement and removal of U13 users was ineffective and under-resourced

378. Despite public claims to the contrary, internal sources reveal that Meta did not effectively enforce or remove U13 users. Beyond the limitations noted above, Meta internally acknowledged in a 2020 document titled "Child Safety – State of Play," which noted that "age assurance" was an area where Meta was "most vulnerable and need[ed] to step up our efforts," that one of its "vulnerabilities" was that it had a "[l]ack of U13 proactive age identification and enforcement mechanism[s]" and had identified as an "Area of Improvement" developing a "system for age verification to block U13s from our services[.]"⁸²⁹ In a September 2020 email forwarding this document to Vice President of Global Affairs, Nick Clegg, a Meta strategic advisor noted that it was "quite worrying" and "tends to confirm the impression I have that this area of work is often sidelined" and "doesn't have the resources or consistent leadership support" needed.⁸³⁰

379. Evidence also indicates that Meta's internal policies regarding age verification differ from the policies it communicates publicly. In particular, Statement D9 found in Instagram's Help Center notes that "we will delete the account if we can't verify the account is managed by

⁸²⁷ Deposition of Robert Sherman, April 30, 2025, 130:25-132:17; META3047MDL-065-00042982, "Re: WKLY Cross-Family Reviews | Escalation: Age Management," Match 4, 2020.

⁸²⁸ META3047MDL-034-00479217, "Re: WKLY Cross-Family Reviews: Youth Privacy Pre-read," January 21, 2021.

⁸²⁹ META3047MDL-004-00027356, "Child Safety - State of Play (7/2020)" July 2020; Deposition of Antigone Davis, March 4, 2025, 319:18-323:21.

⁸³⁰ Deposition of Antigone Davis, March 4, 2025, 316:3-13; META3047MDL-004-00027355, "Kids note," September 1, 2020.

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someone *over* 13 years old.” (emphasis added)⁸³¹ By contrast, in response to an interrogatory posed by the Plaintiffs in this matter, Meta stated that its internal policy is that “[w]here Meta has indicia that the user is not *under* the age of 13, Meta may automatically permit the user who has been flagged as potentially underage to continue using Instagram.”⁸³² Whereas Meta’s publicly communicated standard for retaining flagged accounts is verification that the flagged user is *over* 13, its internal policy, as enforced in practice, is that by default a user’s account is not removed unless the company verifies that the user is *under* 13.⁸³³ A default such as that allows many more U13 accounts to remain on the platform than if the company only allowed users on the platform who could affirmatively demonstrate that they are aged 13 years or older. Meta’s default practice of allowing U13s on its platforms unless it can verify that the account holder is U13 is in clear contrast with other age-restricted activities such as gambling, smoking, and voting, where the default is that those wishing to engage in the activity must affirmatively prove they are old enough before being permitted to do so.

380. Meta’s reporting flow for U13 accounts is also notably ineffective. According to Mr. Béjar, it is “almost impossible to report underage accounts.”⁸³⁴ In one email from 2019, Monica Bickert referred to the reporting flow as “broken,” after she attempted to report a user for being underage and experienced an error.⁸³⁵ In response to this discovery, Antigone Davis replied, “I agree it is more than pretty bad and suggests we want to deter underage reporting.”⁸³⁶

⁸³¹ “Report a child under 13 on Instagram,” *INSTAGRAM.com*, <https://help.instagram.com/517920941588885>. Accessed July 14, 2025.

⁸³² Meta’s Responses and Objections to the Illinois Civil Investigative Demand, dated April 10, 2023, at 5 (emphasis added).

⁸³³ Meta’s Responses and Objections to the Illinois Civil Investigative Demand, dated April 10, 2023, at 5.

⁸³⁴ Deposition of Arturo Béjar, April 7, 2025, 195:7-24.

⁸³⁵ Deposition of Monika Bickert, May 1, 2025, Exhibit 51.

⁸³⁶ Deposition of Monika Bickert, May 1, 2025, Exhibit 51.

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The undersigned hereby certifies their understanding that they owe a primary and overriding duty of candor and professional integrity to help the Court on matters within their expertise and in all submissions to, or testimony before, the Court. The undersigned further certifies that their report and opinions are not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation.



Adam L. Alter, Ph.D.

August 1, 2025

Date