

## **AMENDED Exhibit 801**

# **PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Jacqueline Beauchere

1

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT )  
ADDICTION/PERSONAL INJURY ) MDL No:  
PRODUCTS LIABILITY LITIGATION ) 4:22-md-3047-YGR  
\_\_\_\_\_ )

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES  
UNLIMITED JURISDICTION

COORDINATION PROCEEDING )  
SPECIAL TITLE [RULE 3.550] ) JCCP No: 5225  
 )  
SOCIAL MEDIA CASES ) Judge:  
\_\_\_\_\_ ) Carolyn B. Kuhl  
 )  
This Document Relates to: ) Department 12  
 )  
ALL ACTIONS )

Volume 1

Thursday, March 13, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Video-Recorded Oral Deposition of  
JACQUELINE BEAUCHERE, held at the law firm of  
Polsinelli, 900 West 48th Street, Suite 900,  
Kansas City, Missouri, 64112, commencing at 9:00  
a.m. CDT on the above date, before Stacy L.  
Decker, Certified Court Reporter, Missouri, CCR  
858.

GOLKOW TECHNOLOGIES, A VERITEXT DIVISION  
877.370.3377 ph | 917.591.5672 fax

Deps@golkow.com

1 A. Thank you.

2 Q. You told us earlier as the global  
3 head of platform safety that you believe it's  
4 important to use all reasonable efforts to  
5 protect children under the age of 18 on  
6 Snapchat, correct?

7 A. Yes.

8 Q. And do you agree that one of the  
9 reasons that that is so important is because  
10 the teenage users of Snapchat, as opposed to  
11 the adults, are more vulnerable?

12 MS. DEGTYAREVA: Objection. Vague and  
13 ambiguous, speculation, foundation.

14 A. Under 18s, by their very nature,  
15 are more vulnerable in all situations.

16 Q. (By Mr. Gaddy) Do you agree that  
17 because --

18 MR. GADDY: You can take the ELMO off.

19 Q. (By Mr. Gaddy) Do you agree that  
20 because there are many under 18 users of  
21 Snapchat and because those under 18 users are  
22 more vulnerable than the adult users, that  
23 Snap owes a heightened standard of care to  
24 those teenage users?

25 MS. DEGTYAREVA: Objection. Vague and

1       ambiguous, speculation, foundation. Calls for  
2       a legal conclusion.

3               A.     Well, I'd go back to the document  
4       that we looked at earlier where it said  
5       15 percent of the population was under 18. So  
6       15 percent is 15 percent. And, yes, there is  
7       a responsibility to take care of all users.

8               Q.     (By Mr. Gaddy) I agree with you  
9       that there is a responsibility to take care of  
10      all users of Snapchat. But my question is  
11      specifically to the -- related to the children  
12      that are under 18 years of old -- excuse me,  
13      18 years of age. Do you understand that?

14              A.     I do.

15              Q.     So my question is to those  
16      children that are under 18 years of age that  
17      use Snapchat, that document earlier we looked  
18      at, in 2023 said there were about 60 million  
19      of them, correct?

20              A.     Correct.

21              Q.     Do you agree that Snap has a  
22      heightened responsibility to those 60  
23      million-ish children under the age of 18 who  
24      use Snapchat because of their vulnerability?

25              MS. DEGTYAREVA: Objection. Vague and

1       ambiguous, speculation, foundation. Calls for  
2       a legal conclusion.

3               A.     Yes, as a broad statement.

4               Q.     (By Mr. Gaddy) Is that a  
5       sentiment that, from your experience, is  
6       shared across Snap, that there is a heightened  
7       responsibility in treating these child under  
8       18 users of Snapchat with a heightened  
9       standard of care because of their  
10      vulnerability?

11              MS. DEGTYAREVA: Objection.  
12      Speculation, vague and ambiguous, foundation.  
13      Calls for a legal conclusion.

14              A.     I would just note teen users, yes,  
15      between the ages of 13 and 17. Those who are  
16      minors on the platform, yes.

17              Q.     (By Mr. Gaddy) You agree that, if  
18      there are aspects of an application like  
19      Snapchat that are unsafe, that it is the  
20      responsibility of the company to take efforts  
21      to improve the safety of its application?

22              MS. DEGTYAREVA: Objection. Vague and  
23      ambiguous, speculation, foundation. Calls for  
24      a legal conclusion.

25              A.     I would need a specific example.

1 Q. (By Mr. Gaddy) Are you familiar  
2 with any of the research that's been done  
3 around social media and the ability of  
4 components of social media platforms to keep  
5 teenagers engaged and increase their interest  
6 in coming back to the platforms?

7 MS. DEGTYAREVA: Objection. Assumes  
8 facts, foundation, speculation.

9 A. At a very high level.

10 Q. (By Mr. Gaddy) Do you have a  
11 general understanding that Snap has some  
12 features that feed into reward systems for all  
13 of its users, to include its teenage users?

14 MS. DEGTYAREVA: Objection. Assumes  
15 facts, foundation, speculation, vague and  
16 ambiguous.

17 A. I would need to know more.

18 Q. (By Mr. Gaddy) Well, one feature  
19 that Snapchat has that you're aware of is  
20 streaks, correct?

21 A. I'm aware of the feature.

22 Q. And you're aware that streaks is a  
23 feature that requires the users to come back  
24 to the platform on a daily basis and to send  
25 snaps to the other member of the streak in

1 order to maintain that streak?

2 A. I understand that's the basis  
3 behind the feature, yes.

4 Q. You understand that one of the  
5 components of Snapchat is a Snap score,  
6 correct?

7 A. I'm less familiar with the Snap  
8 score.

9 Q. You have a high level  
10 understanding that each Snapchat user has a  
11 Snap score that is reflective of the amount of  
12 use of Snapchat that that person has?

13 MS. DEGTYAREVA: Objection.  
14 Foundation, speculation.

15 A. That's about my understanding, and  
16 that's probably where it ends.

17 Q. (By Mr. Gaddy) You have an  
18 understanding that a Snapchat user is able to  
19 see the number of times that their story that  
20 they post on Snapchat has been viewed by  
21 others?

22 A. No, I'm not aware. I'm not a big  
23 snapper in terms of sending snaps.

24 Q. Do you have an understanding that  
25 a Snapchat user is able to go to Snapchat and

1 press, other articles, advertisements, other  
2 platforms, yes.

3 Q. (By Mr. Gaddy) Are you saying  
4 it's not Snap's responsibility to educate  
5 parents about the risks their teens could  
6 experience on Snapchat?

7 MS. DEGTYAREVA: Objection. Misstates  
8 the testimony, vague and ambiguous,  
9 speculation, foundation.

10 A. I'm saying that if Snap didn't do  
11 it -- which is not the case. Snap does do it  
12 and we do offer materials for parents and  
13 others. If Snapchat or some other platform  
14 didn't do it, there are certainly other  
15 sources from which parents and trusted adults  
16 and caregivers could glean that information.

17 Q. (By Mr. Gaddy) When Family Center  
18 rolled out in August of 2022, it was the first  
19 effort by Snap to give parents the ability to  
20 go on to Snapchat and have any insight into  
21 what their teenager user was doing on the  
22 platform, correct?

23 MS. DEGTYAREVA: Objection.  
24 Speculation, foundation.

25 A. That is the basic operation of



1 Family Center.

2 Q. (By Mr. Gaddy) And that  
3 August 2022 was the first time that was  
4 available, correct?

5 MS. DEGTYAREVA: Objection.  
6 Speculation, foundation.

7 A. To my knowledge, yes.

8 Q. (By Mr. Gaddy) And Snap was the  
9 last major platform to develop any such tools  
10 for parents, correct?

11 MS. DEGTYAREVA: Objection.  
12 Foundation.

13 A. I don't know that.

14 (Exhibit 16 was marked.)

15 Q. (By Mr. Gaddy) I'll show you  
16 P-Snap 250, which we'll mark as Exhibit Number  
17 16.

18 A. I'm sorry. Are we still working  
19 with this?

20 Q. We're going to come back to it off  
21 and on, so just keep it handy. Same with the  
22 interrogatories. If you just want to set  
23 those to the side.

24 Do you see this is Exhibit 16,  
25 250, another document from your custodial

1 was an intention to give parents privacy  
2 controls for their kids?

3 A. I don't know.

4 MS. DEGTYAREVA: Objection.  
5 Speculation, foundation.

6 (Exhibit 19 was marked.)

7 Q. (By Mr. Gaddy) I'll show you what  
8 I'll mark as Exhibit 19. It's P-Snap 832.

9 And if you flip to the first page,  
10 this is a PowerPoint entitled, "Family Center  
11 12/1/21 Updates." Do you see that?

12 A. I see it.

13 Q. And if you flip one more time, the  
14 next slide says "Updates." Do you see that?

15 A. I do.

16 Q. And the first update listed there  
17 is, "Privacy controls section removed."

18 Do you see that?

19 A. I see it.

20 Q. And if you flip two pages to the  
21 Bates ending 209, it looks like somebody has  
22 copy and pasted a Google Doc comment from  
23 Mr. Spiegel. Do you see that?

24 A. I see that.

25 Q. It says, "I think it may be a

1 little strange to let the parent change the  
2 setting. I think the goal here is to give the  
3 parent visibility but not necessarily control.  
4 I'm not even sure we need to show the privacy  
5 setting."

6 Do you see that?

7 A. I see it.

8 Q. Did you have an understanding that  
9 Mr. Spiegel had personally weighed in on  
10 whether or not to give the parents access to  
11 privacy control for their teenagers?

12 MS. DEGTYAREVA: Objection.  
13 Speculation, foundation.

14 A. I did not.

15 Q. (By Mr. Gaddy) Did Mr. Spiegel  
16 ever share with you his logic or his reasoning  
17 for wanting to remove in the initial roll out  
18 the ability of parents to have access to  
19 privacy controls for their kids?

20 A. He did not.

21 Q. If you flip to the Bates ending  
22 212, the slide says "Permissions Dialogue."  
23 Do you see that?

24 A. I do.

25 Q. And, again, you see another

1 comment from Mr. Spiegel that's been pasted  
2 into the slide here. Do you see that?

3 A. I see it.

4 Q. And he says, "Let's get rid of the  
5 manage your privacy controls. I think the  
6 concept here is visibility but not control."

7 Do you see that?

8 A. I do.

9 Q. Were you aware that it was  
10 Mr. Spiegel who provided the guidance and the  
11 direction to strip the privacy controls from  
12 the initial roll out of Family Center?

13 MS. DEGTYAREVA: Objection.  
14 Foundation, speculation, assumes facts.

15 A. I was not.

16 Q. (By Mr. Gaddy) You were present  
17 for several different Safety Advisory Board  
18 meetings when Family Center was discussed; is  
19 that correct?

20 A. It's not actually, because the  
21 Safety Advisory Board in its current  
22 incarnation, as I've created it, did not come  
23 until later in 2022.

24 Q. You've been present at Safety  
25 Advisory Board meetings when Family Center was

1 tell everyone to adopt it?

2 A. No.

3 Q. You certainly didn't tell  
4 policymakers, regulators, or NGOs that, did  
5 you?

6 A. No.

7 Q. You can put that aside.

8 If we can go back to -- I think  
9 it's Exhibit Number 5. It should be in your  
10 stack over there, P-Snap 257. It's the one we  
11 looked at this morning to get the 60 million  
12 number for teenage age users.

13 Do you recognize this document  
14 from this morning?

15 A. Yes.

16 Q. If we look at the top of the first  
17 page Bates ending 949, it says, "SAB in-person  
18 convening product think topic."

19 Do you see that?

20 A. Yes.

21 Q. And the product leads, the first  
22 person listed there is Abby Tran who we just  
23 saw those messages from, correct?

24 A. Yes.

25 Q. Also Alex Osborne who is one of

1 the people that we saw her corresponding with,  
2 correct?

3 A. Yes.

4 Q. Flip if you would, please, to  
5 Bates ending 951. At the bottom of the page  
6 it says "Parent awareness." Do you see that?

7 A. Yes.

8 Q. Do you recall a moment ago that we  
9 saw Ms. Tran said that adoption of Family  
10 Center remained extremely low, correct?

11 A. I'm just trying to keep track of  
12 the timeline. This is now 2023. And this was  
13 in preparation for a June board meeting in  
14 2023. And these other documents were a little  
15 bit earlier, I recall, at the end of 2022.

16 Q. So we're about a year later, six  
17 months to a year later?

18 A. Six months later, I think.

19 Q. It says, "Parent awareness, almost  
20 500,000 parents have sent a Family Center  
21 invite since launch, but our latest user  
22 research shows that parents' awareness of  
23 Family Center remains low."

24 Do you see that?

25 A. I do.

1 Q. And fair to say that's kind of  
2 borne out in the numbers, 60 million teenage  
3 users, just 500,000 of them have sent invites.  
4 That's pretty low adoption, correct?

5 A. 60 million teenage users,  
6 15 percent. These are the parents who send  
7 the invite, so 500,000 parents have sent the  
8 invite. I don't know how many parents are on  
9 Snapchat.

10 Q. Well, you have to be on Snapchat  
11 to send the invite, so at least 500,000,  
12 right?

13 A. Yes, but I -- for your  
14 percentages, your percentage comparisons and  
15 your -- you know, you said only 500,000 teens.  
16 The parents send the invite, yes.

17 Q. Okay. Thank you for that  
18 clarification.

19 A couple sentences down, there's a  
20 sentence that starts, "Family Center is  
21 extremely hard." It starts on the right-hand  
22 side of the page.

23 A. I see it.

24 Q. Do you see that?

25 A. I do.

1 Q. "Family Center is extremely hard  
2 to find in the app."

3 Do you see that?

4 A. I do.

5 Q. This is still something that's  
6 being said six months after we saw that  
7 comment from Ms. Tran about limiting the  
8 discoverability, correct?

9 A. Yes.

10 Q. And then she says, "We have two  
11 major challenges when attempting to reach  
12 parents." Do you see that?

13 A. Uh-huh.

14 Q. Do you understand now after seeing  
15 some of those messages from Ms. Tran that this  
16 -- the concept -- or the fact, I should say,  
17 that Family Center was extremely hard to find  
18 was actually by design?

19 MS. DEGTYAREVA: Objection. Misstates  
20 the document. Speculation, foundation.

21 A. Again, I wasn't privy to those  
22 documents and I don't -- I don't have that  
23 knowledge.

24 Q. (By Mr. Gaddy) According to  
25 Ms. Tran and the documents that you saw, that



1 was an intentional decision by Snap, correct?

2 MS. DEGTYAREVA: Objection. Misstates  
3 the documents. Speculation, foundation.

4 A. According to what we read, but I  
5 don't have any knowledge about that.

6 Q. (By Mr. Gaddy) And even at this  
7 point, 6 months later, nobody had told you  
8 that that was the decision that Snap had made,  
9 correct?

10 MS. DEGTYAREVA: Objection. Assumes  
11 facts.

12 A. We knew that it was difficult to  
13 find, and there were remedies made afterwards.

14 Q. (By Mr. Gaddy) Right. But my  
15 question is, six months later, at the time of  
16 this meeting, nobody had told you that it was  
17 an intentional decision by Snap to make it  
18 difficult to find?

19 MS. DEGTYAREVA: Objection. Misstates  
20 the documents, assumes facts.

21 A. No one told me that.

22 Q. (By Mr. Gaddy) Flip the page for  
23 me, please. Let's look at teen adoption.  
24 This is the same little bit that we read this  
25 morning. Second sentence says, "About 60

1 million of daily Snapchat users are 13 to  
2 17 years old representing 15 percent of our  
3 total user base."

4 It says, "While about 200,000  
5 teens have accepted invitations and joined  
6 Family Center, this makes up only about  
7 0.33 percent of all Snap teens."

8 Do you see that?

9 A. I do.

10 Q. And you agree that's a low buy-in  
11 from teens across the board, correct?

12 A. It's a low percentage.

13 Q. It goes on to say, "Only 750 teens  
14 join Family Center on a daily basis with a  
15 27 percent invite to accept rate."

16 Do you see that?

17 A. I do.

18 Q. That means that approximately  
19 three out of four kids are rejecting the  
20 invitation from their parents to participate  
21 in Family Center, correct?

22 A. They could be rejecting that  
23 invitation because it's not coming from a  
24 parent or it's coming from someone that they  
25 might not know. There could be a variety of

1 advisory being provided to teenage users of  
2 Snapchat that the quick add function of  
3 Snapchat may connect them to adults?

4 MS. DEGTYAREVA: Objection.  
5 Speculation, foundation, assumes facts.

6 A. No.

7 (Exhibit 25 was marked.)

8 Q. (By Mr. Gaddy) I'll show you what  
9 we'll mark as Exhibit 25. This is P-Snap 747.  
10 This is another document from your custodial  
11 file, again, a month or so after you started  
12 at the company. And if you flip the page, it  
13 says, "Senate Commerce Subcommittee on  
14 Consumer Protection, Protecting Kids Online,  
15 Snapchat, TikTok, and YouTube."

16 Do you see that?

17 A. I do.

18 Q. And you understand that this is  
19 the hearing where Ms. Stout provided  
20 testimony, correct?

21 A. I do.

22 Q. And if you flip the page again, do  
23 you see that throughout the course of this  
24 document, it's some kind of mock questions and  
25 then talking points to help respond to some of

1 those questions that are posed?

2 A. I do. I was just curious as to  
3 when this may have been added to my custodial  
4 file or -- I see when the document -- that's  
5 the creation date for the document, correct?

6 Q. That's my understanding. You've  
7 got all the information I have.

8 A. Okay. Because I -- I would just  
9 state that I don't -- I was not privy to the  
10 creation of this document. This was very soon  
11 after my arrival. But I'm happy to go through  
12 it.

13 Q. Fair to say that this type of  
14 document is one that you've seen from time to  
15 time in Snap where either the comms team or  
16 the policy team puts together some questions  
17 and then talking points on how to help folks  
18 respond to those questions?

19 A. Correct.

20 Q. If you'd flip for me, please, to  
21 Bates ending 929. In the middle of the page  
22 there are some questions and answers that are  
23 posed there about quick add. Do you see that?

24 A. Yes.

25 Q. The question that's posed is, "You

1 say Snapchat is meant to connect best friends  
2 who really know each other. If so, then why  
3 do you offer something like quick add?"

4 Do you see that?

5 A. I see it.

6 Q. And you're familiar with that --  
7 that comment that's made in the first  
8 sentence, that Snap regularly says things like  
9 "Snapchat is meant for best friends," right?

10 A. At my time at Snap, it's not been  
11 about this best friends piece. It's just been  
12 about people who know each other in real life.

13 Q. Have you ever used the best friend  
14 language in talking and being the voice of  
15 safety at Snap?

16 A. I have not.

17 Q. Why would you not use that phrase?

18 A. I'm taking this question here,  
19 this sample question, quite literally. And I  
20 don't see a need to connect best friends. I  
21 see a need to enhance communications and a  
22 relationship between best friends, but I don't  
23 see a need to connect best friends. That's  
24 why we talk about Snapchat, and I think  
25 Snapchat is about connecting people that you

1 already know in real life and to enhance those  
2 -- that relationship through these fun,  
3 visual, playful communications.

4 Q. In the suggested response to that  
5 one, it says, "Quick add suggestions rely on  
6 connections among friends and help people  
7 discover their real friends on Snapchat. It's  
8 particularly important for a new user who  
9 joins Snapchat who needs help finding their  
10 real life friends."

11 Do you see that?

12 A. I do.

13 Q. You understand that the email we  
14 just looked at a moment ago contradicts that  
15 by suggesting that those users were being  
16 suggested to become friends with strangers?

17 MS. DEGTYAREVA: Objection.  
18 Speculation, foundation.

19 A. I don't think there's a  
20 contradiction. Two things can be true at the  
21 same time.

22 Q. (By Mr. Gaddy) Okay. The next  
23 question says, "Our office created an account  
24 as a 13-year-old and immediately got  
25 recommendations for contacts in quick add who

1       were strangers."

2                   Do you see that?

3           A.    I do.

4           Q.    It sounds like the question being  
5       anticipated by Snap here was very similar to  
6       the situation that it had been made aware of  
7       by the Parents Together organization, correct?

8           A.    Yes.

9           Q.    It says, "What would keep an adult  
10      from using quick add to seek out and befriend  
11      young kids on your platform?"

12                  Do you see that?

13          A.    I do.

14          Q.    And, again, we just looked at that  
15      Parents Together email where they were  
16      providing Rachel, who shared with you,  
17      Ms. Stout, and others, examples of predators  
18      connecting with kids via Snapchat's quick add  
19      function, correct?

20                  MS. DEGTYAREVA:  Objection.  
21      Speculation, foundation.

22          A.    I can't confirm that.

23          Q.    (By Mr. Gaddy)  That's what was  
24      represented in the document, right?

25          A.    It was represented in the

## C E R T I F I C A T E

I, STACY L. DECKER, a Certified Court Reporter within and for the State of Missouri and Certified Shorthand Reporter within and for the State of Kansas, hereby certify that the within-named witness was first duly sworn to testify the truth, and that the testimony by said witness was given in response to the questions propounded, as herein set forth, was first taken in machine shorthand by me and afterwards reduced to writing under my direction and supervision, and is a true and correct record of the testimony given by the witness.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, or relative or employee of such attorneys or counsel, or financially interested in the action.

WITNESS my hand and official seal at my office in said County and State, this 19th day of March, 2025.

<%13872,Signature%>

---

STACY L. DECKER, CSR, CCR  
CCR No. 858  
State of Missouri



Jacqueline Beauchere

420

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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ADDICTION/PERSONAL INJURY ) MDL No:  
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\_\_\_\_\_ ) Carolyn B. Kuhl  
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ALL ACTIONS )

Volume 2

Friday, March 14, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Continuation of Video-Recorded Oral  
Deposition of JACQUELINE BEAUCHERE, held at the  
law firm of Polsinelli, 900 West 48th Street, Suite  
900, Kansas City, Missouri, 64112, commencing at  
9:00 a.m. CDT on the above date, before Stacy L.  
Decker, Certified Court Reporter, Missouri, CCR  
858.

GOLKOW TECHNOLOGIES, A VERITEXT DIVISION

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Deps@golkow.com

1 Q. Can you spell her last name?

2 A. I think it's like [REDACTED]

3 [REDACTED] There might be an R in there.

4 I'm sorry. I'm visualizing it and can't get  
5 it right now.

6 Q. That's fine. Fair to say you're  
7 aware that there was some type of study done  
8 last year regarding streaks, correct?

9 A. Yes, I believe it was 2024.

10 Q. And that was done by Snap?

11 A. It was -- yes, as I understand it.

12 Q. That would be Morgan Hammerstrom's  
13 department?

14 A. I don't know for sure.

15 Q. And you have a general  
16 understanding that there were at least 13,000  
17 responses within this study?

18 A. That was my understanding, yes.

19 Q. Okay. You've never -- sorry. Go  
20 ahead.

21 A. I'm sorry. I don't know that it  
22 was formal research. I think it was more of a  
23 question put out to users, you know, what do  
24 they see in streaks, how do they use streaks,  
25 what's the longest streak that someone has

1 had, that type of thing.

2 Q. You've never had an opportunity to  
3 actually review that research yourself?

4 A. I did not.

5 Q. You have not reviewed any of the  
6 13,000 plus responses yourself?

7 A. I have not. I've heard anecdotal  
8 feedback about some of the more salient ones  
9 and more prominent ones.

10 Q. Have you had an opportunity to  
11 read an abstract or summary of the findings of  
12 that study?

13 A. No. It was used to influence --  
14 it was used to inform a panel that we were  
15 doing last year. And one of -- a few of my  
16 external contacts were going to participate in  
17 that panel. But they were not asking  
18 specifically about streaks. It was another  
19 component of the panel.

20 Q. Outside of that study from 2024  
21 that you just told us about that was a kind of  
22 a Q&A about users' experience with streaks,  
23 are you aware of any other research that Snap  
24 has done into streaks and specifically looking  
25 at the issue of whether or not streaks cause

1 stress and anxiety for its users?

2 A. No. Again, it's not my area.

3 Q. All right. Do you see the  
4 question that's there under streaks?

5 A. I see a couple of them.

6 Q. Well, I think there's one  
7 question, and then there is some bullets,  
8 talking points. Do you see that?

9 A. The first question, second  
10 question, third, fourth.

11 Q. Sure, sure. I'm just talking  
12 right there under the heading streaks. Do you  
13 see that?

14 A. Yes. Questions, yes.

15 Q. It says, "It's my understanding  
16 that Snapchat has a product called 'streaks'  
17 that entices young people to become addicted  
18 to their app and that if they don't send  
19 messages to their friends every day their  
20 streak ends."

21 The question is, "Why would you  
22 create a product like this? How do you think  
23 this impacts the mental health of your young  
24 users? Are you doing anything to mitigate  
25 adverse effects?"

1 Do you see that?

2 A. I do.

3 Q. And you had heard -- or you have  
4 heard over your time at Snap these types of  
5 questions and these types of complaints about  
6 streaks causing addictive and compulsive use  
7 in teenagers, correct?

8 A. I've heard this vaguely. I mean,  
9 it's -- again, it's not an area that I get  
10 involved with specifically.

11 Q. When you say it's not an area you  
12 get involved with specifically, what do you  
13 mean by that?

14 A. When I talk to policymakers or  
15 lawmakers or others, it comes up very, very  
16 infrequently. They know that I'm there to  
17 talk about safety and specific safety subject  
18 matter issues.

19 Q. And things like stress and anxiety  
20 on the mental health side is not something  
21 that typically falls into your bailiwick as  
22 far as what you're dealing with regulators and  
23 policymakers about, correct?

24 A. Correct.

25 Q. If you look down at the one, two,

1 three, fourth bullet point, it starts, "In a  
2 very small." Do you see that?

3 A. I do.

4 Q. It says, "In a very small subset  
5 of users, we heard streaks can add some  
6 anxiety, so we've been working to deemphasize  
7 the prominence of streaks by becoming more  
8 lenient in how long it takes for streaks to  
9 expire, resulting in 60 percent reduction in  
10 customer contacts about streaks, and have  
11 additional changes in the pipeline so that  
12 there is less pressure to come back and  
13 continue a streak."

14 Do you see that?

15 A. I do.

16 Q. Are you -- do you know what's  
17 being referred to there as far as the finding  
18 that Snap acknowledges that some of its users  
19 are experiencing anxiety around streaks?

20 A. I do not.

21 Q. If you go down to the sixth bullet  
22 point where it says "Stress level for  
23 streaks," do you see that?

24 A. I do.

25 Q. The first bullet point says,

1 "Intolerable, two percent. Large, four  
2 percent. Stress, six percent."

3 Do you see that?

4 A. I do.

5 Q. You agree it would not be a good  
6 thing if there are two percent of the younger  
7 users of Snap who are experiencing intolerable  
8 amounts of stress and anxiety from streaks?

9 MS. DEGTYAREVA: Objection. Vague and  
10 ambiguous, speculation, foundation, assumes  
11 facts.

12 A. I also see in the third bullet  
13 that 46 percent, so nearly half, say no stress  
14 at all.

15 Q. (By Mr. Gaddy) Is the answer to  
16 my question that, yes, it's a bad thing that  
17 two percent of young users are experiencing  
18 stress and anxiety from streaks?

19 MS. DEGTYAREVA: Same objections.

20 A. Well, we wouldn't want anyone to  
21 -- to feel intolerable stress. But, again,  
22 the majority, little to moderate -- little and  
23 moderate is 48 percent. No stress at all is  
24 46 percent. So clearly the large majority of  
25 people are using this feature in an

1 appropriate way and not experiencing stress.

2 Q. (By Mr. Gaddy) Well, that's  
3 actually not true, right, Ms. Beauchere? The  
4 majority are indicating some level of stress  
5 from the product, true?

6 A. I'm looking at 48 percent, little  
7 to moderate. And moderate is 15 percent. No  
8 stress at all is 46 percent, which is pretty  
9 significant.

10 Q. Ms. Beauchere, it's true that the  
11 majority of the respondents to this research  
12 that Snap did, the majority indicated that  
13 they were experiencing stress and anxiety from  
14 streaks, true?

15 A. Well, I'm just looking at these  
16 raw numbers. I don't know the basis for this  
17 research. I've never seen this research. So  
18 I can't comment.

19 Q. You don't disagree with the  
20 numbers on the page that the majority of  
21 respondents to this research conducted by Snap  
22 experienced some level of stress from streaks,  
23 true?

24 MS. DEGTYAREVA: Objection.  
25 Speculation, foundation. Lack of personal



1 knowledge.

2 A. I wouldn't want to comment,  
3 because I'm just seeing just vague titles and  
4 percentages.

5 Q. (By Mr. Gaddy) Well, the one that  
6 says no stress at all is less than 50 percent,  
7 right?

8 A. It's 46 percent. But little is a  
9 third.

10 Q. Is that acceptable from your  
11 perspective for --

12 MS. DEGTYAREVA: Objection. Vague and  
13 ambiguous.

14 Q. (By Mr. Gaddy) Is that acceptable  
15 from your perspective for a third of Snapchat  
16 users, particularly teenagers, to experience a  
17 little amount of stress and anxiety from this  
18 product feature?

19 MS. DEGTYAREVA: Objection. Vague and  
20 ambiguous, assumes facts, speculation,  
21 foundation.

22 A. I'm -- I'm not going to comment.  
23 Everyone has a little stress from many things.  
24 It's -- it's too vague. I would want to know  
25 more about this research. I haven't reviewed

1 it.

2 Q. (By Mr. Gaddy) So you have no  
3 position on whether or not it's acceptable  
4 from Snap's perspective for a third of its  
5 users to be experiencing a little amount of  
6 stress from this product?

7 MS. DEGTYAREVA: Objection. Vague and  
8 ambiguous, assumes facts, speculation,  
9 foundation, asked and answered.

10 A. No, I don't. I'm sticking with my  
11 answer.

12 Q. (By Mr. Gaddy) And when we're  
13 talking about results like this that are  
14 presented in percentages, would you agree that  
15 it's important to keep in perspective the  
16 number of users of Snapchat so that we can  
17 confer those percentages to the number of real  
18 life people?

19 MS. DEGTYAREVA: Objection.  
20 Speculation, foundation, assumes facts, vague  
21 and ambiguous.

22 A. No, I wouldn't. Because, as I  
23 said, I don't know the details of this  
24 research, and I don't know the user base.  
25 It's not necessarily tied to the whole user

1 base. This could be research that is tied to  
2 a small number of individuals. We don't know  
3 what the N is here.

4 Q. (By Mr. Gaddy) Well, let's do  
5 some simple math. If -- you recall from  
6 yesterday that in 2023 there were about 60  
7 million teenage users of Snapchat?

8 A. Yes.

9 Q. If we were to extrapolate that two  
10 percent of individuals who experience an  
11 intolerable amount of stress and anxiety from  
12 streaks to that 60 million teenagers, that  
13 means 1.2 million teenagers would be  
14 experiencing an intolerable amount of stress  
15 and anxiety from streaks, correct?

16 MS. DEGTYAREVA: Objection.  
17 Speculation, foundation, assumes facts.

18 A. Again, I think it's too  
19 speculative. We don't know what the details  
20 are around this research. And I would like to  
21 stick to the N that -- whatever is tied to  
22 this research, and I don't know what that is.  
23 It's not necessarily something that just can  
24 be extrapolated.

25 Q. (By Mr. Gaddy) You're not

1 Speculation, foundation, assumes facts.

2 A. I have not.

3 Q. (By Mr. Gaddy) And that, of  
4 course, would not cause you to know that;  
5 that's not information you ever provided to  
6 policymakers, regulators, or the media,  
7 correct?

8 A. Correct.

9 Q. Let's go back to Exhibit 25,  
10 P-SNAP 747. And stay on Bates 926. And the  
11 question on the bottom of the page there is,  
12 "Are streaks addictive?"

13 Do you see that?

14 A. I do.

15 Q. And if you go to the top of the  
16 next page, it says, "We haven't conducted any  
17 research measuring the addictiveness of our  
18 features."

19 Do you see that?

20 A. I do.

21 Q. And is that consistent with your  
22 understanding that Snap has never conducted  
23 any research or investigation as to whether  
24 any of its features are addictive or not?

25 A. Yes.

1           Q.    You're not aware of Snap ever  
2           trying to answer the question of, "Is any  
3           feature of its product addictive," true?

4           A.    I'm not aware of any such  
5           research.

6           Q.    You're familiar with the spotlight  
7           section of Snapchat?

8           A.    Yes.

9           Q.    You're familiar with the fact that  
10          the spotlight section of Snapchat is an  
11          endless scroll design?

12          MS. DEGTYAREVA:  Objection.  Vague and  
13          ambiguous.

14          A.    I wouldn't characterize it as  
15          such.

16          Q.    (By Mr. Gaddy)  How would you  
17          characterize it?

18          A.    There is no scrolling involved as  
19          far as I know.  It's a series of tiles.

20          Q.    How do you get from one tile to  
21          the next?

22          A.    Well, you certainly move up and  
23          down, but it's not just this constant feed of  
24          news.  You have to actually click on something  
25          and open it up.  Again, it's not where I spent

1 A. I do.

2 Q. Do you recall earlier we looked at  
3 that media training, and there was the mental  
4 health section, and there was some feel good  
5 language, and your comment was, "This is  
6 pretty thin"?

7 A. I recall.

8 Q. You'd say the same thing about  
9 these sentences here, wouldn't you? We're  
10 committed to keeping Snapchatters safe, safety  
11 and well-being of our community is our top  
12 priority. That's also a lot of talk and not  
13 much action, correct?

14 MS. DEGTYAREVA: Objection. Vague and  
15 ambiguous, argumentative.

16 A. I didn't have any input to this  
17 document. I did have input to that other  
18 document that we were talking about.

19 Q. (By Mr. Gaddy) You wouldn't have  
20 used this language, would you?

21 A. Not necessarily.

22 Q. You can put this one aside. We're  
23 going to go back to Exhibit 25, the  
24 congressional -- or, excuse me, the Senate  
25 preparation document. It's P-SNAP 747, and

1 I'm going to be on Bates 927.

2 In the middle of the page, there's  
3 questions about beauty filters. Do you see  
4 that?

5 A. I do.

6 Q. Do you have an understanding that  
7 Snapchat offers beauty filters to its users?

8 A. I do. But, again, this is not  
9 something where I get involved.

10 Q. What is your understanding of what  
11 a beauty filter is on Snapchat?

12 A. I would just isolate my  
13 understanding to a filter generally or a lens.  
14 It's a playful way for young people to put on  
15 bunny ears or a vomit a rainbow or put on a  
16 pink beard with friends, and it's a fun and  
17 playful way to engage with the app.

18 I've heard of these beauty  
19 filters. I can't say I've -- I'm deeply  
20 involved with these or really understand them.

21 Q. Fair to say that Snap offers to  
22 its users many fun and silly features,  
23 cartoon-ish type filters -- I said features, I  
24 meant filters -- like the ones you just  
25 described, right?

1 A. Correct.

2 Q. You also have an understanding  
3 that it offers beauty filters, correct?

4 A. I can't say that I've encountered  
5 a beauty filter or tried a beauty filter.

6 Q. And I'm not going to ask you  
7 personally about your use. But you have a  
8 general understanding that Snap offers beauty  
9 filters to its users?

10 A. A general understanding. But I've  
11 never seen one, as I said, or used one or --

12 Q. And it offers those filters to its  
13 teenage users, correct?

14 A. I don't know.

15 Q. Teenage users aren't carved out of  
16 the ability to use beauty features, correct?

17 A. Not that I know of.

18 Q. Do you have a general  
19 understanding that some of the beauty filters  
20 that Snap offers to its teenage users lightens  
21 their skin in the way it makes them appear?

22 MS. DEGTYAREVA: Objection.  
23 Speculation, foundation, assumes facts.

24 A. I don't know.

25 Q. (By Mr. Gaddy) Do you have an



1 break?

2 THE DEPONENT: How are we doing on  
3 time? What have we done so far?

4 VIDEO TECHNICIAN: Not quite an hour.  
5 Almost an hour.

6 THE DEPONENT: I'm easy.

7 MS. DEGTYAREVA: If you're good to  
8 keep going, we can keep going. If you need to  
9 take a break, we can take a break. Whatever  
10 you want.

11 THE DEPONENT: I've only drank one  
12 glass of water, not two, so let's go.

13 Q. (By Mr. Gaddy) Next I'm going to  
14 ask some questions about age verification.  
15 We're actually going to stay within the same  
16 document.

17 A. Okay.

18 Q. And turn to Bates ending 931.  
19 This is still P-SNAP 747 in Exhibit Number 25,  
20 I believe.

21 Now, we talked a little bit  
22 yesterday about the fact that Snapchat is  
23 designed only for individuals age 13 and up,  
24 correct?

25 A. Correct.

1 Q. And we also talked a little bit  
2 yesterday about the fact that, during the  
3 registration process, a new user self-reports  
4 their date of birth which then tells Snap how  
5 old that user is, correct?

6 A. Correct.

7 Q. And fair to say that Snap has a  
8 general understanding that sometimes children  
9 under the age of 13 will lie about their age  
10 and insert a date of birth that makes them  
11 appear to be older so that they can create a  
12 Snapchat account?

13 A. Yes, we're aware of that.

14 Q. If you look at the questions on  
15 this page under the Trust and Safety Leo  
16 heading, it says "Age verification/underage  
17 usage."

18 Do you see that?

19 A. I do.

20 Q. And the first question is, "Do you  
21 collect data of children under the age of 13?"

22 Do you see that?

23 A. I -- excuse me. I see it.

24 Q. And in the third bullet point, it  
25 says, "We recognize that in some instances

1 individuals may infer that the reason their  
2 registration failed was due to the age they  
3 entered and try a different age."

4 Do you see that?

5 A. I see it.

6 Q. So you told us just a moment ago  
7 that you know that sometimes kids under 13  
8 will lie about their age. But another thing  
9 that happens is sometimes children will be  
10 honest about their age, tell the -- tell Snap  
11 that they're 10, 11, 12 years old, and in  
12 those situations Snap will reject them and not  
13 allow them to create an account, correct?

14 A. Correct.

15 Q. Now, as we see here in this bullet  
16 point, Snap also has an understanding that  
17 some of those kids who get rejected will  
18 figure out, gee, it's because I was honest  
19 about my date of birth, and they may then go  
20 back and try again to create an account and  
21 use a different date of birth that's dishonest  
22 in order to be accepted onto the platform,  
23 correct?

24 MS. DEGTYAREVA: Objection.

25 Speculation, foundation.

1 A. Yes.

2 Q. (By Mr. Gaddy) Are you aware of  
3 any techniques or practices at Snap to try to  
4 identify those children who are originally  
5 rejected because they originally entered an  
6 honest date of birth that showed they were  
7 under 13 and then used the same device to  
8 change their age and say they're now over 13  
9 and therefore get a Snapchat account?

10 MS. DEGTYAREVA: Objection.  
11 Foundation.

12 A. It's not my area about the  
13 registration process and potential underage  
14 users using the platform. But there are other  
15 individuals at the company that would be able  
16 to answer these questions.

17 Q. (By Mr. Gaddy) Fair to say that  
18 it's your understanding that the same device  
19 that was originally rejected, whether it's a  
20 computer, whether it's an iPhone, an Android,  
21 device, is allowed to register again just  
22 minutes later and change the date of birth?

23 A. I don't know.

24 MS. DEGTYAREVA: Objection.  
25 Foundation, speculation.

1 more.

2 Q. (By Mr. Gaddy) Well, you told us  
3 yesterday that you agree that teenagers are  
4 more vulnerable users than adults, correct?

5 A. Yes.

6 Q. You would agree that, when we  
7 start talking about eight-year-olds,  
8 nine-year-olds, 10-year-olds, 11-year-olds,  
9 12-year-olds, who Snap is now receiving  
10 regular periodic updates about those aged  
11 children using Snapchat, those kids are even  
12 more vulnerable than the teenage users that we  
13 talked about yesterday, correct?

14 MS. DEGTYAREVA: Objection. Assumes  
15 facts, misstates the documents.

16 A. At a high level, yes.

17 Q. (By Mr. Gaddy) And that's why it  
18 would be very concerning to Snap to have  
19 learned that, not only are there these eight-,  
20 nine-, 10-, 11-, 12-year-olds using Snapchat,  
21 but that Sweden and now Iceland are seeing an  
22 increase in cases of sexual violations against  
23 those children, that's very concerning, right?

24 MS. DEGTYAREVA: Objection.  
25 Speculation, foundation, assumes facts.

1           they don't understand or know about.

2                   Q.    Do you see the section that I was  
3           referring to?

4                   A.    Yes, I do.

5                   Q.    Okay. The first bullet point  
6           under there is "Ephemeral Messaging." Do you  
7           see that?

8                   A.    I see it.

9                   Q.    It says, "It's the most well-known  
10          aspect of Snapchat and is a top source of  
11          concern for parents."

12                   Do you see that?

13                   A.    I see it.

14                   Q.    Do you know what ephemeral  
15          messaging means?

16                   A.    It's disappear by default.

17                   Q.    That means that messages that  
18          teens sent to anybody else or that is sent to  
19          the teen disappears by default, correct?

20                   A.    Unless the teen has pressed and  
21          held on it so that they could save it.

22                   Q.    What's your understanding of how  
23          quickly those messages disappear?

24                   MS. DEGTYAREVA: Objection.  
25          Speculation, foundation.

1                   A.    My understanding is within  
2   24 hours.

3                   Q.    (By Mr. Gaddy) You understand  
4   that you can change that setting -- sorry.

5                   Do you think the visual messages  
6   are set to 24 hours?

7                   A.    No. Those will disappear once  
8   seen. But we're talking about -- are we  
9   talking about snaps or are we talking about  
10   chats?

11                  Q.    Good qualification. They're both  
12   ephemeral, right?

13                  A.    Correct.

14                  Q.    The picture messages disappear  
15   once they're seen, correct?

16                  A.    That's correct.

17                  Q.    The chats stay for how long?

18                  MS. DEGTYAREVA: Objection.  
19   Speculation, foundation.

20                  A.    You can hold them for as long as  
21   you want. Obviously if you press and hold on  
22   it, you can retain that message. And this  
23   said ephemeral messaging, so that's why I was  
24   focused on messaging, not the snaps. And you  
25   can replay snaps as well if you wanted to.

1 Q. (By Mr. Gaddy) What's the default  
2 for the chats?

3 MS. DEGTYAREVA: Objection.  
4 Speculation, foundation.

5 A. I don't know the default for the  
6 chats. I know they disappear. But you can  
7 retain up to 24 hours. I think you can set  
8 that -- make that setting. And then, again,  
9 you can press and hold and you can hold it as  
10 long as you'd like until you delete it.

11 Q. (By Mr. Gaddy) It says, "Parents  
12 worry about their inability to properly  
13 supervise their teens' correspondence with  
14 friends given the disappearing nature and  
15 mentioned that this feature may encourage  
16 teens to misbehave with a false sense of  
17 privacy or security."

18 Do you see that?

19 A. Sorry. I do now. You started  
20 with parents and actually it's "they worry."  
21 Yes, I see it now.

22 Q. Does that concern that's being  
23 expressed there by parents make sense to you?

24 MS. DEGTYAREVA: Objection. Vague and  
25 ambiguous.



1 time of complaints from schools or school  
2 districts about children's use of Snapchat  
3 within school?

4 MS. DEGTYAREVA: Objection. Assumes  
5 facts.

6 A. I've heard about instances from  
7 time to time. But, again, I'm not the primary  
8 contact that a school would have for an issue.

9 Q. (By Mr. Gaddy) Who would be the  
10 primary contact within Snap to accept and  
11 respond to complaints, comments, from schools?

12 A. Probably someone in trust and  
13 safety operations or law enforcement  
14 operations.

15 Q. And who are the kind of heads of  
16 those two departments?

17 A. The combined entity of trust and  
18 safety operations and law enforcement  
19 operations is Aaron Altschuler. And then he  
20 has leads in those respective areas as well.

21 (Exhibit 53 was marked.)

22 Q. (By Mr. Gaddy) I'll show you  
23 P-SNAP 815, which I've marked as Exhibit 53.

24 Do you see this is an email chain  
25 and you're listed on the final email in the

1 chain going back and forth with Ms. Tupper.

2 Do you see that?

3 A. I do.

4 Q. And to read it chronologically,  
5 you see there was an email from a school  
6 district that went to Mr. Spiegel in January  
7 of 2022?

8 A. I see it.

9 Q. And he forwarded that to you and  
10 Ms. Stout, correct?

11 A. Yes. I just want to get the time  
12 frame. This is like three months into my  
13 tenure at Snap. Yes.

14 Q. And it looks like you sent the  
15 email to Ms. Tupper about a week or so after  
16 first getting it from Evan?

17 A. Yes.

18 Q. Are you with me on the timing?

19 A. I'm with you on the timing. I  
20 just -- I don't -- I don't recall this. I'm  
21 trying to familiarize myself.

22 Q. Let's look at it. We'll read some  
23 of it together and see if it jogs your memory.

24 January 5th, 2022, it says "Via  
25 email to Mr. Evan Spiegel, CEO, Snapchat."

1 Do you see that?

2 A. Yes.

3 Q. Below that it says, "Dear  
4 Mr. Spiegel, We are writing to you today as  
5 educators, social media users, public school  
6 leaders, and, most importantly, as individuals  
7 who care deeply about students, their learning  
8 and well-being. This letter is a call to  
9 action, an invitation to engage, and a plea  
10 for your partnership."

11 Do you see that?

12 A. I see it.

13 Q. If you go down to the bottom of  
14 this page, there's a bolded section that  
15 starts, "However. It says, "However, when  
16 used with ill-intent by some individuals in  
17 our community, social media can be a dangerous  
18 amplifier of anonymous voices who spread hate  
19 and discord and impact student, staff,  
20 community health, safety, and well-being."

21 Do you see that?

22 A. I do.

23 Q. It says, "Recently we have seen an  
24 uptick in social media being used dangerously  
25 by some as a platform for bullying,

1 discrimination, and malicious behaviors."

2 Do you see that?

3 A. I do.

4 Q. In the next paragraph, it says,  
5 "In particular, this impacts the safety,  
6 well-being, and mental health of our students  
7 as their developmental years are filled with  
8 anxiety and fear. It impacts our schools as  
9 our teachers and administrators spend  
10 countless hours tracking down and working  
11 through the drama and danger of these harmful  
12 messages" -- excuse me -- "that these harmful  
13 messages ignite when social media is used in  
14 this manner."

15 Do you see that?

16 A. I do.

17 Q. The concerns being expressed here  
18 about social media having an impact on  
19 schools, students, teachers, and  
20 administrators, those at a high level are  
21 concerns that you've heard from time to time  
22 about Snapchat, correct?

23 MS. DEGTYAREVA: Objection.

24 Speculation, foundation, assumes facts.

25 A. From time to time.

1 Q. (By Mr. Gaddy) Is there any  
2 process that you're familiar with within Snap  
3 to handle and respond to complaints like this  
4 that are sent to Snap, whether it's to  
5 Mr. Spiegel or through some other channel?

6 MS. DEGTYAREVA: Objection.  
7 Speculation and foundation.

8 A. Yes, there are a variety of  
9 channels. Sometimes -- oh, here it is. In  
10 some instances I will respond and engage. In  
11 some instances others will respond and engage  
12 from trust and safety operations, from law  
13 enforcement operations. And then there is a  
14 specific channel that law -- that schools can  
15 go to if they want to report an issue and have  
16 us follow up.

17 Q. (By Mr. Gaddy) And to be clear,  
18 I'm not talking about acute safety issues, so  
19 I'm not -- I'm not asking you about a post  
20 about a school shooting or something like  
21 that. I'm asking about general kind of use  
22 leading to disruption of the school function.

23 Is there any type of process for  
24 how to handle and deal with those, or is that  
25 consistent with what you just told us?

1 MS. DEGTYAREVA: Objection. Assumes  
2 facts, speculation, and foundation.

3 A. Yes, so there's a specific team  
4 that's a component of law enforcement  
5 operations, which is called safety operations  
6 outreach, and they engage with schools about  
7 issues like this.

8 Q. (By Mr. Gaddy) Are you familiar  
9 with Snap ever taking any action to prevent  
10 teenage students from using Snapchat during  
11 the school day?

12 MS. DEGTYAREVA: Objection.  
13 Speculation, foundation, and assumes facts.

14 A. Not Snapchat specifically, no.

15 Q. (By Mr. Gaddy) What do you mean  
16 by that?

17 A. There are efforts underway at  
18 schools across the globe where students are  
19 not allowed to use their phones during the  
20 day. So there are school phone bans that are  
21 taking place, and that would ban everything  
22 related to the phone, not just Snapchat.

23 Q. Okay. So you're aware of actions  
24 being taken by schools to try to limit the use  
25 of phones in schools, fair?

1 A. Fair.

2 Q. Are you aware of any actions taken  
3 by Snap to try to limit the use of Snapchat by  
4 students during the school day?

5 MS. DEGTYAREVA: Objection.  
6 Speculation, foundation, and assumes facts.

7 A. I'm not aware, but I necessarily  
8 wouldn't not be aware.

9 Q. (By Mr. Gaddy) You're not aware  
10 of any efforts by Snap to ever disable the use  
11 of Snapchat by students during the school day?

12 MS. DEGTYAREVA: Objection.  
13 Speculation, foundation, assumes facts.

14 A. No.

15 Q. (By Mr. Gaddy) You're not aware  
16 of any efforts by Snap to try to do things  
17 like geofence around schools and prevent the  
18 use of Snapchat within those geofenced areas  
19 during a school day?

20 MS. DEGTYAREVA: Objection.  
21 Speculation, foundation, and assumes facts.

22 A. Again, I'm not aware of those  
23 efforts, nor would I probably be, because  
24 these are not -- it's not in my issue area.

25 (Exhibit 54 was marked.)

1 Q. (By Mr. Gaddy) I'll show you what  
2 I'll mark as Exhibit 54. This is P-SNAP 388.

3 This is a document from July of  
4 2023. If you open the first page, you'll see  
5 an email from Rachel to a group of folks that  
6 includes you as well as some of the other  
7 people we've been discussing today. Do you  
8 see that?

9 A. Yes. Quite an extensive list.

10 Q. And the subject of this is,  
11 "Read-out From the National Student Safety and  
12 Security Conference and Workshop."

13 Do you see that?

14 A. Yes.

15 Q. You said a moment ago that schools  
16 typically isn't within your wheelhouse, but  
17 this is a conference that you attended,  
18 correct?

19 A. Yes, one of three. Not one of  
20 three that were held. I attended one of those  
21 three.

22 Q. Did somebody from Snap attend all  
23 three?

24 A. No. Someone from -- different  
25 representatives from Snap attended each of the



1 three installments.

2 Q. Thank you. Rachel writes,  
3 "Sharing a read-out below and linked for ease  
4 to comment of Snap's participation in the  
5 National Student Safety and Security  
6 Conference and Workshop on July 20-21 in New  
7 York City, attended by school officials,  
8 educators, and school safety officers."

9 Do you see that?

10 A. Yes.

11 Q. "So Snap was a sponsor of the  
12 conference. JB" -- that's you?

13 A. It is.

14 Q. -- "and Rachel gave a 30-minute  
15 safety presentation which covers an overview  
16 of the app, how and why we are different from  
17 other platforms, our safety values, a sampling  
18 of our safety initiatives, and introduction to  
19 how we work with law enforcement."

20 Do you see that?

21 A. I do.

22 Q. And you agree with that  
23 characterization that you and Rachel were  
24 involved in presenting at this conference?

25 A. Yes. This is Rachel Hochhauser,

1 not Rachel Racusen, so this is a different  
2 individual than we've been talking about  
3 throughout.

4 Q. Rachel R. is in comms; Rachel H.  
5 is in law enforcement?

6 A. Law enforcement operations,  
7 correct.

8 Q. Who was the audience that you were  
9 presenting to at this conference?

10 A. So this conference, National  
11 Student Safety and Security Conference, is  
12 apparently something that goes on a few times  
13 a year. These are their various national  
14 conferences, and there are teachers, other  
15 educators, school officials, school  
16 superintendents, from across the U.S.,  
17 depending on where they are located  
18 regionally.

19 And there was one -- the one that  
20 I attended was in New York with Rachel  
21 Hochhauser. And then there was one in Houston  
22 and there was one in Las Vegas, all a part of  
23 our platinum sponsorship for that year.

24 Q. Fair to say that the attendees at  
25 this conference were a pretty decent

1 cross-section of school administrators,  
2 security officers, teachers, those types of  
3 folks?

4 A. Yes, an array of those  
5 individuals.

6 Q. Were there any other social media  
7 companies at this conference that had the  
8 opportunity to present that you're aware of?

9 A. Not that I know of, no. I think  
10 we were the only one.

11 Q. In the next paragraph it says,  
12 "Jacqueline, Rachel, and [REDACTED] then met with a  
13 group of participants who self-selected to  
14 participate in a roundtable discussion about  
15 their experiences on the app and how Snap was  
16 surfacing in their schools."

17 Do you see that?

18 A. Yes.

19 Q. If you go to the next paragraph,  
20 it says, "All participants said that Snapchat  
21 is a part of their everyday life at school and  
22 said both parents and students regularly  
23 report to them harms or concerns connected to  
24 Snapchat."

25 Do you see that?

1 A. Yes.

2 Q. Did you have an understanding that  
3 there would regularly be harms and concerns  
4 connected to Snapchat within school systems  
5 prior to you going to this conference?

6 MS. DEGTYAREVA: Objection. Assumes  
7 facts, speculation, and foundation.

8 A. I'm sorry. Could you repeat the  
9 question?

10 Q. (By Mr. Gaddy) Sure. Had you  
11 ever heard that before, that parents and  
12 students were regularly reporting harms or  
13 concerns connected to Snapchat?

14 MS. DEGTYAREVA: Same objections.

15 A. Regularly reporting, no. But that  
16 there were reports made by those groups, yes.  
17 I -- I'm quibbling with the "regularly." I  
18 didn't know about that.

19 Q. (By Mr. Gaddy) It says,  
20 "Specifically, they named their most  
21 concerning interactions with the app as those  
22 involving threats of violence and shooting  
23 threats, but called out a whole range of  
24 issues including bullying, sending of nudes,  
25 and financial sextortion of males. It always

1 goes to Snapchat."

2 Do you see that?

3 A. I do.

4 Q. You have an understanding that  
5 sextortion of males is something that was  
6 prevalent on Snapchat?

7 MS. DEGTYAREVA: Objection.  
8 Foundation, speculation, assumes facts.

9 A. We started -- Snapchat started  
10 really fighting back against financial  
11 sextortion on the platform maybe a year or two  
12 prior -- a year and a half or two prior to  
13 this. And it's an issue that takes place  
14 unfortunately on all platforms and services,  
15 not just Snapchat.

16 Q. (By Mr. Gaddy) It says, "They  
17 keenly observed that the very things that  
18 attract teens to Snapchat, privacy, autonomy,  
19 and perceived ephemerality, is what makes  
20 policing it difficult."

21 Do you see that?

22 A. I see it.

23 Q. Does that concept make sense to  
24 you?

25 MS. DEGTYAREVA: Objection. Vague and

1           ambiguous, speculation, foundation.

2                   A.    I understand the point that's  
3           being made here.

4                   Q.    (By Mr. Gaddy) Do you agree with  
5           the point that it is difficult to police a  
6           platform like Snapchat when teens are  
7           attracted to it because of privacy  
8           ephemerality?

9                   MS. DEGTYAREVA: Objection.  
10          Speculation, foundation, assumes facts, and  
11          vague and ambiguous.

12                  A.    I can't say what makes policing  
13          difficult. That would be beyond my scope.  
14          But I can see the first half of the sentence.  
15          I acknowledge that.

16                  Q.    (By Mr. Gaddy) It says, "The  
17          Virginia SRO" -- you understand that's school  
18          resource officer?

19                  A.    I do.

20                  Q.    -- "threats are getting out of  
21          control over Snapchat adding he addresses  
22          threats to shoot one to two times a month.  
23          From another, Snapchat is becoming more of a  
24          distraction every day."

25                  Do you see that?

1 A. I do.

2 Q. From the Santa Rosa -- excuse me.

3 "From the school resource officer in Ohio,  
4 they're doing everything in Snapchat because  
5 they think parents and teachers won't find it.  
6 They think it's super secretive and private."

7 Do you see that?

8 A. I see.

9 Q. Those are concerns that you've  
10 heard before from teachers and school  
11 administrators as it relates to Snapchat and  
12 how they impact the function of school, true?

13 A. Sorry. One more time.

14 Q. Those are concerns, what we just  
15 read, that you've heard before from teachers  
16 and school administrators as it relates to  
17 Snapchat and how Snapchat can impact the  
18 function of school, correct?

19 A. We heard them in this instance.  
20 Again, I don't get much involved with schools  
21 and parents directly. Those are other  
22 people's responsibilities and other people's  
23 external stakeholders. But this is what we  
24 heard in this installment of this series of  
25 engagements.

1 Resource Officers, said his approach is to  
2 tell parents to keep their kids off app and  
3 shared that his upcoming start of school  
4 newsletter will include this graphic."

5 Do you see that?

6 A. I do.

7 Q. And the graphic says, "Snapchat is  
8 the number one cause of drama in school-aged  
9 children. Snapchat leads to students sending  
10 inappropriate images, texts, and bullying. If  
11 you want to protect your child, make them  
12 delete it and block them from downloading it."

13 Do you see that?

14 A. I do.

15 Q. Do you understand that's a pretty  
16 strong reaction from this one particular  
17 school resource officer who deals with teenage  
18 kids on a regular basis?

19 MS. DEGTYAREVA: Objection. Assumes  
20 facts, speculation, vague and ambiguous.

21 A. Rachel, as I recall, had a  
22 separate conversation with him and followed up  
23 afterwards. This is something that he shared  
24 with her that he was planning on sending, and  
25 I think subsequent conversations between the



1 images, inappropriate texts, and bullying,  
2 would be distracting in a school setting if  
3 that was happening?

4 MS. DEGTYAREVA: Objection.

5 Speculation, foundation, vague and ambiguous.

6 A. I wouldn't want to say what his  
7 intention was. Because, again, we don't know  
8 if this is -- it says drama in school, but  
9 these things unfortunately go out -- go on  
10 outside of school as well, and sometimes they  
11 filter back to the school.

12 Q. (By Mr. Gaddy) If you flip to the  
13 next page, there's a list of I think some of  
14 the negative takeaways from these meetings.  
15 Do you see the word "negatives" there?

16 A. I do.

17 Q. It says, "They described  
18 themselves as being 'slammed' with Snapchat  
19 issues and called it a distraction."

20 Do you see that?

21 A. Sorry. Could you please reorient  
22 me?

23 Q. Sure. Under "Negatives" at the  
24 top of the page, I'm reading the first entry,  
25 it says, "They," meaning the school

1 administrators, resource officers, et cetera,  
2 "described themselves as being 'slammed' with  
3 Snapchat issues and called it a distraction."

4 Do you see that?

5 A. I do.

6 Q. Do you agree that teachers,  
7 administrators, and school resource officers  
8 being slammed with Snapchat issues and  
9 Snapchat being a distraction is not a good  
10 thing for the school environment?

11 MS. DEGTYAREVA: Objection.  
12 Speculation, foundation, assumes facts, and  
13 vague and ambiguous.

14 A. Again, I can only comment on what  
15 I heard at the time from these seven  
16 individuals. But on -- on the whole, at the  
17 100,000-foot level, not a good thing.

18 Q. (By Mr. Gaddy) I'm sorry. You  
19 said not a good thing?

20 A. Not a good thing.

21 Q. "Private stories are where many of  
22 the issues take place with kids thinking that  
23 they will be notified of a screenshot and not  
24 thinking about how else content could be  
25 captured and shared."

1 Do you see that?

2 A. I do.

3 Q. Do you have an understanding that,  
4 if someone takes a screenshot of something on  
5 Snapchat, the other user is given a  
6 notification, correct?

7 A. That's how I understand it, yes.

8 Q. You also understand that, if a  
9 user has a Snap that came from somebody else  
10 on their phone and somebody else takes a  
11 picture of it, the sender of that original  
12 Snap does not get any type of notification,  
13 correct?

14 A. Correct. But that would have to  
15 be done quickly, because we -- as we said,  
16 snaps delete immediately once they're seen.

17 Q. It says, "The taking and sharing  
18 of nudes was described as the never-ending  
19 problem."

20 Do you see that?

21 A. I do.

22 Q. Do you agree teenagers taking and  
23 sharing nudes is not a good thing for the  
24 school environment?

25 MS. DEGTYAREVA: Objection.

1 Speculation, foundation, vague and ambiguous.

2 A. I have a complex -- more of a  
3 complex answer here. So in -- in the 21st  
4 century, this is unfortunately, for maybe  
5 those of us who are not of this generation,  
6 this is sexual discovery and sexual  
7 exploration in the 21st century, and that's  
8 backed up by data by Thorn and others. So  
9 it's a problematic -- it's a problem in and of  
10 itself in that it's further complicated by  
11 where we are in today's world.

12 Q. (By Mr. Gaddy) Can we agree that  
13 it's not the thing that should be happening  
14 over Snapchat in school amongst teenagers?

15 MS. DEGTYAREVA: Objection. Assumes  
16 facts, speculation, foundation, and vague and  
17 ambiguous.

18 A. Again, with this statement, it's  
19 not to say that it's happening in school. I  
20 can only extrapolate that the school is being  
21 made aware of it in some way.

22 Q. (By Mr. Gaddy) It says, "One  
23 school official in Alabama compared it to  
24 vaping without any way to actually detect it  
25 being brought into schools."

1 Do you see that?

2 A. I see it.

3 Q. Do you agree that vaping and JUUL,  
4 the company that sells vapes, is not a good  
5 category for Snapchat to be put into?

6 MS. DEGTYAREVA: Objection. Vague and  
7 ambiguous, speculation, foundation.

8 A. I don't recall this particular  
9 part of the dialogue to be honest, so I  
10 wouldn't want to comment on this.

11 Q. (By Mr. Gaddy) And if you go down  
12 -- skip the next two, it says, "The school  
13 resource officer from Ohio said nudes are an  
14 issue every day from as young as 3rd and 4th  
15 graders, nine and ten years old. Most of what  
16 we have originates on Snapchat."

17 Do you see that?

18 A. I see it.

19 Q. Do you recall -- going back to  
20 what you said earlier about the difference  
21 between words and action, do you recall any  
22 actions being taken by anyone at Snap in  
23 response to the information that was learned  
24 by you and Rachel and [REDACTED] at this particular  
25 conference of educators?

1 MS. DEGTYAREVA: Objection.

2 Speculation and foundation.

3 A. I know that it was reviewed. I  
4 know that it was considered. I know that many  
5 people read this report, and perhaps others,  
6 that we had when we summarized these findings,  
7 and there were two other installments. So I  
8 know that it was -- it was looked at.

9 And I think, again, just back to  
10 some other points that I was making earlier,  
11 one of the comments from the Wyoming official  
12 -- this was a Wyoming superintendent of  
13 schools, if I recall correctly, because I  
14 remember his comment specifically.

15 He said, for adults, meaning  
16 parents and teachers, they said -- they said  
17 that Snapchat is a "triggering comment."

18 And then he said it's a defense  
19 mechanism to something that they don't  
20 understand.

21 And he was quite -- quite  
22 well-versed in Snapchat, and he made some  
23 valuable contributions to the conversation.

24 Q. (By Mr. Gaddy) I understand you  
25 to tell me that this report was reviewed, this

1 was looked at by many people.

2 Are you aware of any actions that  
3 were taken by Snap to try to make there be a  
4 better experience within schools around the  
5 country as it relates to Snapchat?

6 MS. DEGTYAREVA: Objection.  
7 Speculation, foundation, and assumes facts.

8 A. Rachel led a series of conferences  
9 or connections with a variety of school  
10 organizations, and they created a toolkit for  
11 teachers that she launched perhaps last year.  
12 I don't remember the exact timing. Last year  
13 sounds about right.

14 So there have been -- there's been  
15 a separate line that's been set up for  
16 teachers and school officials to report  
17 incidents of Snapchat. So there have been --  
18 there have been developments. I'm not  
19 intimately involved with them or aware of all  
20 of them, but there have been specific efforts.

21 Q. (By Mr. Gaddy) Your understanding  
22 is some of those developments were as a result  
23 of what was learned attending some of these  
24 conferences in 2023?

25 A. That's correct.

## C E R T I F I C A T E

I, STACY L. DECKER, a Certified Court Reporter within and for the State of Missouri, hereby certify that the within-named witness was first duly sworn to testify the truth, and that the testimony by said witness was given in response to the questions propounded, as herein set forth, was first taken in machine shorthand by me and afterwards reduced to writing under my direction and supervision, and is a true and correct record of the testimony given by the witness.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, or relative or employee of such attorneys or counsel, or financially interested in the action.

WITNESS my hand and official seal at my office in said County and State, this 20th day of March, 2025.

<%13872,Signature%>

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STACY L. DECKER, CSR, CCR  
CCR No. 858  
State of Missouri