

Filed Under Seal

EXHIBIT M

EXPERT REPORT OF DR. BRIAN N. LEVINE

State of New Mexico v. Meta Platforms, Inc., et al.

State of New Mexico, First Judicial District Court, Santa Fe County

No. D-101-CV-2023-02838

July 11, 2025

1 Introduction and Summary of Opinions

I have been asked to evaluate and discuss in this report several critical issues, as follows.

- Whether Defendant's¹ efforts to detect child sexual abuse materials (CSAM) and the commercial sexual exploitation of children (CSEC) are adequate.
- Whether the design choices on Defendant's platforms pose avoidable dangers to minors, depriving them of safety and privacy.
- Whether Defendant's statements to the public regarding CSAM/CSEC and child safety on their platforms were consistent with internal knowledge and awareness on the same topics.
- Potential interventions and abatements that could reduce the danger that Defendant's platforms pose to minors.

My findings and conclusions are held to a reasonable degree of certainty based knowledge, skill, experience, research, and training in the field of computer science; my extensive experience over many years working with organizations (including law enforcement authorities) dedicated to the investigation and prevention of internet crimes against children; my review and knowledge of relevant scientific literature; and my review of litigation materials produced in this matter.

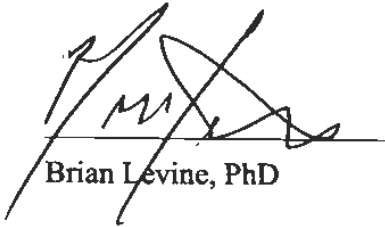
I conclude the following primary points:

- The Defendant's CSAM/CSEC detection efforts were inadequate to protect children's fundamental human rights to privacy and to be free from sexual exploitation, particularly given the leading size and scale of Defendant's platforms and their substantial financial resources.
- Defendant maintained a dichotomy between what they stated to the public and their internal discussions and actions regarding CSAM/CSEC and child safety on their platforms.
- Defendant maintained platforms that encouraged youth to be vulnerable and engaged, and as history and studies show, vulnerable youth are targets of predators who used Defendant's technology to find victims.
- Defendant consistently prioritized its platforms' growth and advertising revenue potential over the safety and privacy of minors.
- Defendant's internal documents reveal that identified safety interventions were often delayed or deprioritized, often unless and until prompted by media scrutiny or regulatory threats, rather than proactive safety-by-design strategies.
- Defendant's detection systems for CSAM and CSEC were inadequate to meet the problems created on the platforms and were often under-resourced or mismanaged.

¹ Throughout this report, when I refer to "Defendant" or "Meta," I am referring to its Facebook, Instagram, Messenger, and WhatsApp platforms generally, or to those platforms specifically (as context may dictate) prior to Meta's formation in 2021.

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.

Executed this 11th day of July 2025 at Northampton, Massachusetts.

A handwritten signature in black ink, appearing to read 'Brian Levine', is written over a horizontal line. The signature is stylized with a large, sweeping 'B' and 'L'.

Brian Levine, PhD