

Filed Under Seal

EXHIBIT I

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400])

SOCIAL MEDIA CASES) Lead Case No.
22STCV21355

This Document Relates To)

STATE OF TENNESSEE, ex rel.)

JONATHAN SKRMETTI,)

ATTORNEY GENERAL and)

REPORTER,)

v.)

META PLATFORMS, INC., and)

INSTAGRAM, LLC.)

Case No. 23-1364-IV)

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF BRIAN BOLAND

APRIL 25, 2025

(Pages 1 - 422)

9:18 a.m. to 7:18 p.m.

Zuckerman Spaeder

2100 L Street, NW, Washington, DC 20037

Reported By: Amanda Blomstrom, RMR, CRR, and
CSR TX #8785/CA #12681/IL #84-3634

1 reading and hearing from former employees that
2 research teams have been decreased, that the freedom
3 of research teams to research their own interests
4 has decreased felt like a broad step away from
5 transparency and understanding of the product.

6 Q. And you said "at the end of the company,"
7 and I think you meant to say "at the end of your
8 tenure at the company"; is that right?

9 A. Yes.

10 I don't have the app anymore, but I know
11 it still exists.

12 Q. All right. You can put that document
13 aside.

14 So I know you just spent a lot of time
15 talking about advertising, and we're not going to go
16 into any specific documents. And I actually want to
17 ask you to step back for a minute. Can you explain,
18 at a very high level, not using any kind of
19 advertising terminology, how Facebook makes money
20 from its ad business.

21 MR. SNEED: Object to form.

22 THE WITNESS: Every day a lot of people --

1 and I think we're in the billions now -- use Facebook
2 and Instagram, meaning that they show up to these
3 places and they spend time looking at posts from
4 their friends, family, from businesses, and
5 influencers, and from a broad array of content.

6 That creates a relatively unprecedented
7 amount of time and attention that people who run
8 businesses and sell things, like toothpaste, would
9 love to be able to influence how those people think
10 and feel and buy their products. That's what a lot
11 of advertising businesses do.

12 And so showing ads inside of Instagram or
13 Facebook is a great starting place to be able to
14 build an ads business where advertisers want to spend
15 a lot of money and pay the company. If you go beyond
16 that and you make it so that the ads are incredibly
17 personalized so that you're seeing, as a person
18 spending that time, an ad that's incredibly relevant
19 to you, you're more likely to click on it, you're
20 more likely to purchase a product, you're more likely
21 to be a valued customer of that business, which makes
22 Facebook and Instagram incredibly valuable to those

1 businesses.

2 And then if I can help you measure that so
3 that you're not just hoping that the ads that you put
4 on Facebook deliver growth for your business but I
5 actually faithfully measure those ads, you will have
6 the confidence as a business to show more ads on
7 Facebook.

8 And that's as simple as the model is, is
9 that it's really relevant ads that grow businesses,
10 that reach people who are spending a massive amount
11 of time on those places.

12 BY MS. SINGER:

13 Q. Okay. So I take it that it's fair to say
14 that Meta's financial success is, at least in part,
15 perhaps in large part, dependent on its ability to
16 add, retain, and engage its users in order to deliver
17 those ads?

18 A. Ab- --

19 MS. SINGER: Object to form.

20 THE WITNESS: Absolutely correct.

21 BY MS. SINGER:

22 Q. And I think you testified earlier that

1 advertising was the primary or the largest source of
2 Facebook's revenue; is that right?

3 A. That is correct.

4 Q. And how do you know that?

5 A. I was involved in the financial reporting
6 of the company at the time I was there.

7 Q. Okay. And I think this was part of what
8 you just said, but revenues Met- -- sorry.

9 Meta's revenue is dependent upon
10 advertisers' willingness to continue to do business
11 with the company, correct?

12 A. That is correct.

13 Q. And you talked about Meta's delivery of
14 ads to targeted audiences, but that's a key part of
15 its ad business, correct?

16 A. That is correct.

17 Q. And in order to deliver targeted ads --
18 and I know you talked about this in granular
19 detail -- Meta relies on user data, correct?

20 A. That is correct.

21 Q. And that includes a user's age and gender,
22 correct?

1 A. Correct.

2 Q. A user's location, correct?

3 A. Correct.

4 Q. And then a user's activity both on and on
5 the platform; is that right?

6 A. On and off the platform, correct.

7 Q. Okay. And the data from Meta's users
8 includes data from users in New Mexico, right?

9 A. Yes.

10 Q. And there's no bar that you're available
11 at -- against Meta harvesting data from New Mexico
12 users, is there?

13 A. Not --

14 MR. SNEED: Object to form and foundation.

15 Go ahead.

16 THE WITNESS: Not that I'm aware of.

17 BY MS. SINGER:

18 Q. Okay. And you'd agree that Meta is aware
19 that it has users in New Mexico, correct?

20 MR. SNEED: Object to form and foundation.

21 THE WITNESS: Yes.

22 BY MS. SINGER:

1 Q. Okay. And how would you know that?

2 A. Meta -- Meta's products are so universally
3 used that we would know, based on the IP addresses,
4 where people are from. I wouldn't have seen a
5 dashboard personally that could say that people
6 were from New Mexico, but statistically it's a near
7 certainty that there are people who use the products
8 from New Mexico.

9 Q. Now, Meta also maintains a website where
10 advertisers can design their own ad campaigns,
11 correct?

12 MR. GOLDFARB: Objection to form.

13 THE WITNESS: That is correct.

14 BY MS. SINGER:

15 Q. And how do you know that?

16 A. I helped to build it.

17 Q. Okay. And can advertisers seeking to
18 advertise on Meta Platforms specify the audience to
19 whom advertisements are shown?

20 A. They can.

21 Q. And that includes targeting by the
22 location of the user, correct?

1 A. As of 2020, that is correct.

2 Q. Okay. And that can be on a state basis;
3 is that right?

4 A. As of 2020, that is my understanding.

5 Q. And you have no information that Meta
6 precluded advertisers from targeting advertisement to
7 New Mexico users; is that right?

8 A. Nothing that I'm aware of.

9 Q. Okay. All right. Are you familiar with
10 the Complaint that the New Mexico Attorney General's
11 Office or the Department of Justice filed against
12 Meta?

13 A. I don't believe so.

14 Q. Okay. I'm going to show you what I have
15 marked as Exhibit 24.

16 (Exhibit Meta-Boland-24 marked.)

17 THE WITNESS: Should I read it?

18 BY MS. SINGER:

19 Q. The whole thing, cover to cover.
20 I'm going to direct you to particular
21 pages,

22 A. Sounds good.