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EXHIBIT B

CONFIDENTIAL

SUMMARY OF OPINIONS
Dana Weiner, Ph.D.

State of New Mexico, Ex Rel., Raul Torrez, Attorney General v. Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC.

First Judicial District Court, Santa Fe County

No. D-101-CV-2023-02838

July 11, 2025

I. Background and Qualifications

I am a clinical psychologist, policy researcher, and implementation specialist with over 25 years of experience providing technical assistance, program evaluation, and data analytic support to child serving systems across the country. I serve as Senior Policy Fellow at Chapin Hall and since 2022 in the Office of Illinois Governor JB Pritzker as the Chief Officer for Children's Behavioral Health Transformation. In this role, I developed a comprehensive roadmap for system transformation ([Blueprint for Transformation: A Vision for Improved Behavioral Healthcare for Illinois Children](#)) that was signed into law as an Executive Order by Governor Pritzker in 2023, and oversee the implementation of recommendations to adjust capacity and streamline access to mental health services for youth.

My analytic consultation in jurisdictions including New York City, Tennessee, Washington, DC, Texas, and California has used predictive analytics, latent class analysis, and geospatial approaches to refine understanding of target population needs and gaps in service capacity. I served for six years as Senior Policy Advisor to the Director of the Illinois Department of Children and Family Services. In 2011, I was appointed by Illinois Governor Pat Quinn to serve on the Illinois Juvenile Justice Commission, in 2013 was appointed to serve on the Child and Family Services Advisory Council, and in 2025 was appointed by Governor Pritzker to serve on the Justice Council. I have taught courses in Statistics and Research Methods to graduate students at the University of Chicago's Crown School of Social Service Administration, as well as the Northwestern University Feinberg School of Medicine. My research has focused on quantifying resource accessibility, analyzing the role of geospatial relationships in outcomes in child welfare systems, and evaluating the implementation of evidence-based treatment models in child welfare and juvenile justice contexts. I obtained my PhD in Clinical Psychology from Northwestern in 1999 and my Bachelor of Science from Cornell University in 1992.

II. Introduction

I have been asked to present opinions on the structures, tools, and practices that will be necessary to support New Mexico's efforts to ameliorate and abate the crisis it faces as a result of social media's negative effects on children and adolescents and the strain these impacts have placed on the community and its resources.¹

Paired with workforce shortages these effects create the need for mental and behavioral health care at levels that exceed the capacity of state and local service systems. In New Mexico, the number of youth experiencing mental health problems and the number of youth experiencing sexual exploitation, either due to explicit child sexual abuse material, sextortion, or sexual exploitation is far beyond what can be addressed with existing government resources.

To address the mental health needs of New Mexico youth, this Abatement Plan proposes a series of system changes that include technological infrastructure, workforce expansion and supports,

¹ See e.g., U.S. Surgeon General. 2023 Advisory: Social Media and Youth Mental Health. Available at <https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf>. Accessed on July 3, 2025; American Psychological Association. Health Advisory on Social Media Use in Adolescence. May 2023, www.apa.org/topics/social-media-internet/health-advisory-adolescent-social-media-use.pdf.

process improvements and training and public awareness as well as service delivery to address rising rates of trauma, depression, anxiety, and related problems. The costs associated with the Abatement Plan have been calculated by Dr. Kelly O'Donnell using estimates in five key categories:

- Awareness and Prevention
- Screening and Assessment
- Linkage, Referral, and Coordination
- Treatment
- Implementation and Oversight

While the primary focus of the Abatement Plan is on enabling the detection and treatment of youth requiring mental health services to address harms caused by social media use and exposure, accomplishing this requires that the necessary structures, processes and resources are in place. The necessary systemic changes are informed by data analytics, implementation science, and decades of experience providing analytic and implementation support to child-serving systems across the U.S. This approach begins with a consideration of the **populations** requiring information, attention and care (e.g. public awareness, screening), the **processes** by which people access needed services (e.g. technological infrastructure, operational change) the **capacity** of the state to deliver needed services (e.g. workforce expansion, training, treatment resources) and the oversight that will ensure **quality** (e.g. data systems for ongoing monitoring, adjustment and evaluation).

My findings and conclusions are held to a reasonable degree of scientific certainty and are based on my knowledge, skill, experience, and training in clinical psychology, policy research and implementation. My review of the scientific literature, data, government, and litigation documents in Attachment A has also informed my opinions. See Attachment A (Materials Considered).

I reserve the right to revise or supplement my report based on additional information provided by Meta or other third parties in this litigation, my own subsequent experience, and any expert reports submitted by Meta.

III. Background on Need and Capacity

Because the abatement of mental health harms will require structural change, augmented capacity to deliver needed services, and improved education and awareness among families, youth, and the individuals who serve them, our approach to developing this plan has involved discussions with subject matter experts across a range of disciplines, review of documents that describe the New Mexico behavioral health service system, and the consideration of epidemiological data reflecting the need for behavioral health services among New Mexico residents under 18.

New Mexico's behavioral health service system relies primarily on services delivered via in-school behavioral health clinics (SBHCs) as well as university-based medical centers (like the

University of New Mexico)². Because the current need for services outpaces capacity, many individuals who are experiencing mental health challenges, along with those who have been victimized or sexually exploited, lack adequate service opportunities for screening, assessment, and treatment. To address the mental health needs of New Mexico’s youth, the state will need to refine infrastructure, expand the workforce, implement education and training, and improve service delivery processes and the systems that support them.

A re-envisioned youth behavioral health care system for New Mexico that is equipped to respond to the needs of youth who have mental health problems caused or exacerbated by social media use will require collaboration and coordination across several state departments and private health care entities. The partners are illustrated in Figure 1.

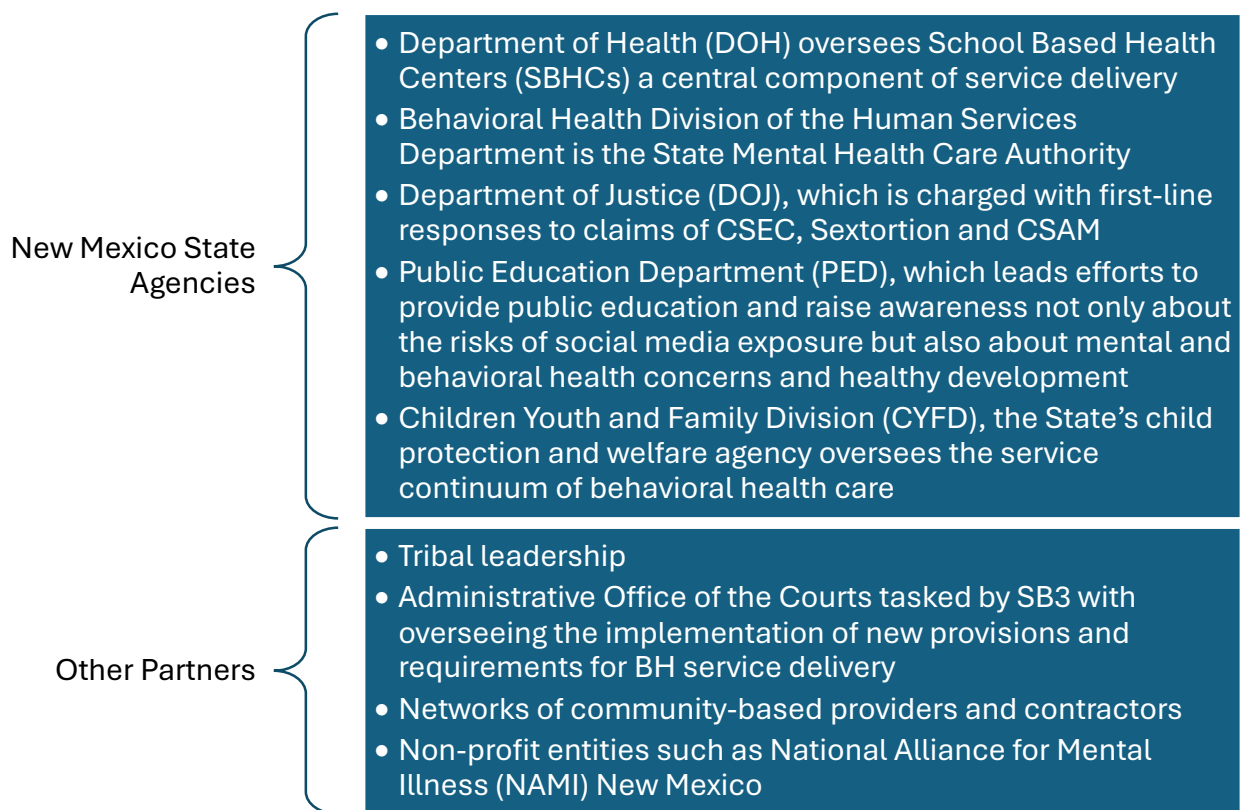


Figure 1.

Each of these entities has undertaken elements of prevention and response, but none are adequately resourced today to provide the amount and level of support needed by New Mexico youth and their families. Additionally, there is a need to provide infrastructure, particularly at an increased level of service delivery, to facilitate coordination among these system components to ensure that identified cases are served efficiently, effectively, and comprehensively. This section describes the contribution of the key components that will drive system transformation.

² Based on subject matter expert discussions with New Mexico Department of Health and the University of New Mexico.