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EXHIBIT D

CONFIDENTIAL

EXPERT SUMMARY OF OPINIONS

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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

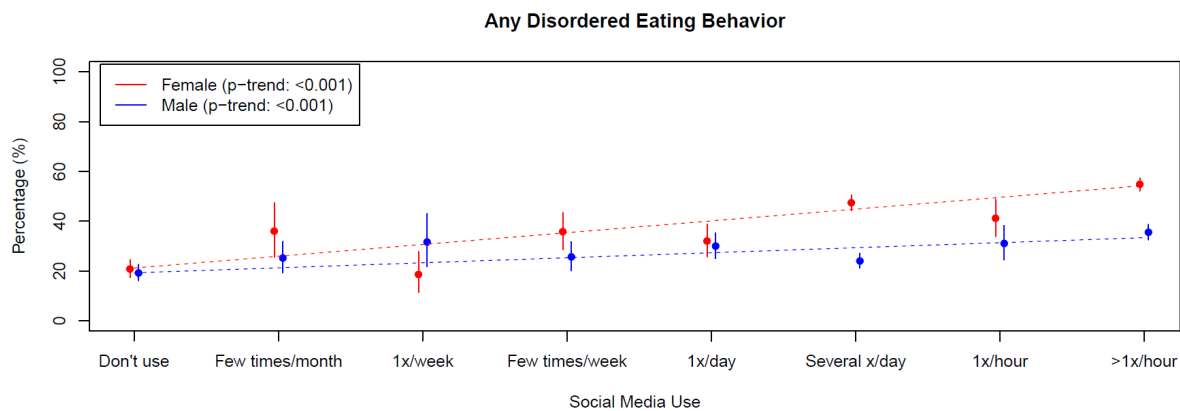
No. D-101-CV-2023-02838

studies on the association between SM use and disordered eating attitudes or behaviors were also identified, and all but four of them found that SM use or problematic SM use was associated with disordered eating attitudes or behaviors (see Appendix IX). Moreover, Meta's own internal research showed that use of their platforms prompted feelings of depression, anxiety, and body image dissatisfaction.⁷⁶

New Mexico Data

35. Only the Middle School NM-YRRS included questions about disordered eating behavior, and it revealed a strong trend with SM use, especially for girls. See Appendix VI.

Figure 10: New Mexico Adolescent Social Media Use and Disordered Eating Behaviors



2. New Mexico Prevalence of Harms

36. I have provided an overview of past, current, and future estimates of relevant harms in New Mexico – see Appendices III-V. These projections inform estimated treatment needs for the future target population in New Mexico.

3. Measuring Impact

37. The estimated proportion of harms attributable to SM exposure is substantial, especially for Middle School girls, who are at an especially vulnerable stage of development. For example, the attributable fraction of mental health harms such as depression and anxiety ranges between

⁷⁶ METANMAG-002-00109734

20-30% for Middle School students, with even larger attributable fractions for High School boys (40-50%, although the baseline prevalence is lower for this group). The attributable fraction of attempted suicide was 30-40% for Middle School students, and was 10-25% for any suicide risk factors among High School students. For disordered eating behaviors, the attributable fraction was especially high for Middle School girls, ranging around 40-60%. (See Appendices VI-VII for all estimates.) There is a significant need for public health interventions to mitigate these harms and prevent future harms from occurring.

4. Abatement

38. The scientific literature has identified various effective intervention strategies related to the harms specified above. For example, a meta-analysis of 25 randomized trials found that preventive psychological interventions reduced the risk of relapses or recurrence of depression by 36%.⁷⁷ Another systematic review found effective psychological interventions for adolescents with suicidal behaviors.⁷⁸ In this section I provide a brief overview of abatement considerations. In general, a comprehensive abatement strategy should have two prongs: **treatment** for those already impacted, and **prevention** of future harms.⁷⁹ Table 1 below summarizes some of the literature on mental health interventions and their impact on some of the harms in this matter.

⁷⁷ K.E.M. Biesheuvel-Leliefeld, *et al.*, “Effectiveness of psychological interventions in preventing recurrence of depressive disorder: meta-analysis and meta-regression,” *J Affect Disord*, 174, 2015, pp. 400-10.

⁷⁸ A. García-Fernández, *et al.*, “Psychological interventions for suicidal behavior in adolescents: a comprehensive systematic review,” *Transl Psychiatry*, 14(1), 2024.

⁷⁹ See also: Expert Report of Kimothi N. Cain, M.D., MPH, In Re: State of New Mexico v. Meta Platforms, Inc., et al. No. D-101-CV-2023-02838. July 11, 2025, and Expert Report of Kristina Sowar, M.D. In Re: State of New Mexico v. Meta Platforms, Inc., et al. No. D-101-CV-2023-02838. July 11, 2025.