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EXHIBIT B

Expert Summary of Opinions

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1. Qualifications

I earned my MSW in social work at Smith College, School for Social Work, in 2010 and my Ph.D. at the University of North Carolina at Chapel Hill in 2017. My bachelor's degree is in psychology/advertising from the University of Texas (2006). Since 2018, I have been a consultant at The National Criminal Justice Training Institute, Fox Valley Technical College, and Faculty Affiliate, at The University of New Hampshire, Crimes against Children Research Center. I became an Associate Professor at the University of Texas at Arlington, School of Social Work in 2024.

I have published literature relevant to technology-facilitated abuse and child sexual exploitation in multiple peer reviewed publications including Journal of Adolescent Health, Frontiers in Psychiatry, Child Abuse & Neglect, and Journal of Human Trafficking. *See* Attachment A (curriculum vitae). Recent grants I have received include those from the Office for Victims of Crime, The National Institute of Justice, and the National Center for Injury Prevention and Control regarding human trafficking and child sexual exploitation.

In my position as an associate professor and researcher, I regularly examine large data sets with variables related to child sexual exploitation and abuse, and interview subject matter experts including members of the criminal justice community, service providers, survivors, and training/support agencies. Collectively, these experiences have given me insight into, among other things, the substantive issue of commercial sexual exploitation of children, including trajectories of abuse and survivorship.

cyberflashing, and online sexual harassment (e.g., online sexual solicitations). In some cases, TFSA includes child sexual exploitation and the commercial sexual exploitation of children. Child sexual exploitation (CSE) is a severe form of child abuse in which an individual or group takes advantage of a power imbalance to manipulate, deceive, or coerce an individual under the age of 18 into sex and/or sexual activities. This exploitation can occur in exchange for something the victim needs or wants including food, shelter, or financial gain. In some cases, these exchanges result in the financial gain or increased social standing of the perpetrator (e.g., “John”) or facilitator (e.g., “pimp”). CSE is closely related to the commercial sexual exploitation of children (CSEC), which is a term used to describe the exchange of sex or sexual acts for goods, services, drugs, money, or other items of value by an individual under the age of 18. If you can think of my work as a funnel, consider TFSA at the top- or the broadest- of the topics outlined above, CSE in the middle, and CSEC as the narrowest. Interestingly, differential research has been focused on CSEC compared to the other topics outlined, as CSEC crimes tend to be the most horrific and therefore the most compelling to funders and the general public. In this summary, I will use these terms purposefully, and the term “children” to describe all individuals under the age of 18, unless otherwise specified.

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.

The opinions I will provide in this case are:

- a. That in 2023 15.6% of individuals under the age of 18 in the United States, or 11.5 million children, experience TFSA, and 1.7% of children in the United

States, or 1.2 million children, affirm they have experienced CSEC online. ^{1,2}

Within the state of New Mexico, this translates to 70,784 children who have experienced TFSA, and 7,713 children that have experienced CSEC online.³

- b. That prevalence numbers likely underestimate the number of children who experience TFSA, CSE, and CSEC within the United States.⁴ One reason for

¹Finkelhor, D., Turner, H., & Colburn, D. (2022). Prevalence of online sexual offenses against children in the US. *JAMA network open*, 5(10), e2234471-e2234471; Finkelhor, D., Turner, H., & Colburn, D. (2024). The prevalence of child sexual abuse with online sexual abuse added. *Child Abuse & Neglect*, 149, Article 106634. <https://doi.org/10.1016/j.chiabu.2024.106634>; Merry, S. E. (2021). *The seductions of quantification*. University of Chicago Press; O'Brien, J.E., Jensen, T., Mitchell, K.J., & White, K. (2023). Commercial Sexual Exploitation Outcomes in a Community Sample of Youth. *Journal of Adolescent Health*. 72(1). 51-58. <https://doi.org/10.1016/j.jadohealth.2022.08.028>; Walsh, W., Finkelhor, D., Turner, H., & O'Brien, J.E. (2024). Commercial online sexual exploitation of children in a national victim survey. *Psychological Trauma: Theory, Research, Practice, and Policy*. Special Issue on Trauma in the Modern Age of Technology. Advance online publication. 1-8. <https://doi.org/10.1037/tra0001821>. ** This assumes a population of 73.8 M individuals under the age of 18 in the United States. This number was derived using 2024 census data. (<https://www.census.gov/quickfacts/fact/table/US/AGE295223>). See also 2024-01-26 UNREDACTED State's Amended Complaint w Exhibit 1_SEALED.

² The difference between TFSA and CSE is described above; however in the paper referred to here TFSA includes all nonconsensual image misuse, nonconsensual image taking, forced image recruitment (e.g., someone forced/threatened you to take a sexual photo), threatened sharing of sexual photos, unwanted sexual talk, unwanted sexual questions, voluntary older partner (e.g., child having sexual conversation with individual 5 years older), commercial talk/images/sexual activity, and unwanted sexual solicitations by adults. CSEC online includes only those children who affirmed providing sexual services for a reward online or- specifically- commercial talk, images, or sexual activity (e.g., live video).

³ This assumes the population of New Mexico is 2,130,256, and that 21.3% of these persons are under the age of 18, as per 2024 census data (<https://www.census.gov/quickfacts/fact/table/NM/US/AGE295223>).

⁴ Franchino-Olsen H, Chesworth BR, Boyle C, Rizo CF, Martin SL, Jordan B, Macy RJ, Stevens L. The Prevalence of Sex Trafficking of Children and Adolescents in the United States: A Scoping Review. *Trauma Violence Abuse*. 2022 Jan;23(1):182-195. doi: 10.1177/1524838020933873. Epub 2020 Jun 26. PMID: 32588741; PMCID: PMC8685723; Bursztein, E., Clarke, E., DeLaune, M., Eliff, D. M., Hsu, N., Olson, L., ... & Bright, T. (2019, May). Rethinking the detection of child sexual abuse imagery on the internet. In *The world wide web conference* (pp. 2601-2607). CyberTipline® REPORT.

- d. That social media platforms have been identified as a means to facilitate TFSA, CSE, and CSEC.^{8, 9}

⁸ Canadian Centre for Child Protection. (2017). Survivors' Survey. Retrieved 6/27/2025 from: https://content.c3p.ca/pdfs/C3P_ExperiencesOfCSAMSurvivors_en.pdf; Coxen, J. O., Castro, V., Carr, B., Bredin, G., & Guikema, S. (2023). COVID-19 pandemic's impact on online sex advertising and sex trafficking. *Journal of Human Trafficking*, 1-18; Finkelhor, D., Turner, H., & Colburn, D. (2022). Prevalence of online sexual offenses against children in the US. *JAMA network open*, 5(10), e2234471-e2234471; Gezinski, L. B., & Gonzalez-Pons, K. M. (2024). Sex trafficking and technology: A systematic review of recruitment and exploitation. *Journal of Human Trafficking*, 10(3), 497-511; Kafafian, M., de Vries, I., Farrell, A., Asiedu, C., & Bouchard, E. (2025). Changing Profiles of Youth Referred for Commercial Sexual Exploitation before and since the Onset of COVID-19 in the United States. *Child Maltreatment*, 10775595251327745; Kloess, J. A., Beech, A.R., Harkins, L. (2014). Online child sexual exploitation: prevalence, process, and offender characteristics. *Trauma Violence Abuse*. 2014;15(2):126-139. doi:10.1177/1524838013511543; Kunz, R., Baughman, M., Yarnell, R., & Williamson, C. (n.d.). Social media and sex trafficking process: From connection and recruitment, to sales. <https://www.utoledo.edu/hhs/htsj/pdfs/smr.pdf>; Latonero, M. (2012). Human trafficking online: The role of social networking sites and online classifieds. Center on Communication Leadership & Policy, USC Annenberg School of Communication & Journalism. https://technologyandtrafficking.usc.edu/files/2011/09/HumanTrafficking_FINAL.pdf; MacKinnon, C. (2021, September 6). OnlyFans is not a safe platform for 'sex work'. It's a pimp. *The New York Times*. <https://www.nytimes.com/2021/09/06/opinion/onlyfans-sex-work-safety.html>; Mitchell, K.J. (2023). Trends and New Directions in the Law Enforcement Response to the Sex Trafficking of Minors. University of New Hampshire, Crimes Against Children Research Center, **NMAG-SM-0712486**; O'Brien, J. E., & Li, W. (2020). The role of the internet in the grooming, exploitation, and exit of United States domestic minor sex trafficking victims. *Journal of Children and Media*, 14(2), 187–203. <https://doi.org/10.1080/17482798.2019.1688668>; O'Brien, J. E., Jones, L. M., Mitchell, K. J., & Kahn, G. Z. (2025). COVID-19 and child sex trafficking: qualitative insights on the effect of the pandemic on victimization and service provision. *Public Health Reports*®, 140(1_suppl), 67S-73S; O'Brien, J.E., Gewirtz-Meydan, A., Mitchell, K. J. (2019). Online requests to run away: Prevalence from a nationally representative sample of youth. *International Journal of Child Maltreatment*, 3(2), 183-197. <https://doi.org/10.1007/s42448>; Richardson, M., & Palmback, T. (2022). Expert analysis of open-source material relating to child sexual abuse material and sex trafficking occurring on OnlyFans.com. Anti-Human Trafficking Intelligence Initiative. <https://followmoneyfightslavery.org/expert-analysis-ofbropen-source-material-relating-to-child-sexual-abuse-material-and-sex-trafficking-occurring-on-onlyfans-com/>; Thorn. (2018). Survivor insights: The role of technology in domestic minor sex trafficking. https://www.thorn.org/wpcontent/uploads/2019/12/Thorn_Survivor_Insights_090519.pdf; Thorn. (2025). Commodified Sexual Interactions Involving Minors: Evolving dynamics in technology-facilitated child sexual exploitation. https://info.thorn.org/hubfs/Research/Thorn_CommodifiedSexualInteractionsInvolvingMinors_A

- i. This includes child victim recruitment, grooming, sexual abuse, extortion, production/distribution of CSAM, management of financial exchanges inherent to commercialized sexual exchanges, and live streaming of sex acts for global buyers.¹⁰
- e. That the near ubiquitous use of technology in the United States has provided access to new and larger populations of victims, buyers, and exploiters, new contexts for recruitment and advertising, and new venues for sexual content and exchange.¹¹

pr2025.pdf; Titheradge, N., & Croxford, R. (2021, May 21). The children selling explicit video on OnlyFans. BBC News. <https://www.bbc.com/news/uk-57255983>; Van Ouytsel, J., Walrave, M., De Marez, L., Vanhaelewyn, B., & Ponnet, K. (2021). Sexting, pressured sexting and image-based sexual abuse among a weighted-sample of heterosexual and LGB-youth. *Computers in Human Behavior*, 117, Article 106630. <https://doi.org/10.1016/j.chb.2020.106630>; Walsh, W., Finkelhor, D., Turner, H., & O'Brien, J.E. (2024). Commercial online sexual exploitation of children in a national victim survey. *Psychological Trauma: Theory, Research, Practice, and Policy*. Special Issue on Trauma in the Modern Age of Technology. Advance online publication. 1-8. <https://doi.org/10.1037/tra0001821>; Williamson, E., & Flood, A. (2021). Systemic and structural roots of child sex trafficking: The role of gender, race, and sexual orientation in disproportionate victimization. *The Historical Roots of Human Trafficking* (pp. 191–216). Springer.

⁹ See link for ongoing compilation of public reports (e.g., media articles, news releases, research reports and summaries, blog posts etc.) documenting the failures and anti-social behaviors exhibited by technology companies, including social media platforms: <https://protectchildren.ca/en/press-and-media/tech-timeline/>.

¹⁰ Greenbaum, J., Kaplan, D., Bodrick, N., & Section on Global Health Haq Heather A. MD, MHS, FAAP Cohn Keri A. MD, FAAP McCann Erin MD, MPH, FAAP McHenry Megan MD, FAAP Torres Alcy R. MD, FAAP Umoren Rachel MD, FAAP. (2025). Human Trafficking and Exploitation of Children and Adolescents: Policy Statement. *Pediatrics*, e2025072214; **METANMAG-011-01723418; MT-IG-AG-NM-000031252; MT-IG-AG-NM-000054789.pdf**.

¹¹ Canadian Centre for Child Protection. (2017). Survivors' Survey. Retrieved 6/27/2025 from: https://content.c3p.ca/pdfs/C3P_ExperiencesOfCSAMSurvivors_en.pdf; Coxen, J. O., Castro, V., Carr, B., Bredin, G., & Guikema, S. (2023). COVID-19 pandemic's impact on online sex advertising and sex trafficking. *Journal of Human Trafficking*, 1-18; Finkelhor, D., Turner, H., & Colburn, D. (2022). Prevalence of online sexual offenses against children in the US. *JAMA network open*, 5(10), e2234471-e2234471; Finkelhor, D., Turner, H., & Colburn, D. (2024). The prevalence of child sexual abuse with online sexual abuse added. *Child Abuse & Neglect*, 149,

- g. That episodes of TFSA have a substantial negative emotional impact on children.¹³
- h. That since the expansion of the internet in the mid-1990s, law enforcement has encountered a growing number of cases of CSEC that involve the possession, distribution, and production of online CSAM.¹⁴

¹³ Finkelhor, D., Turner, H., & Colburn, D. (2023). Which dynamics make online child sexual abuse and cyberstalking more emotionally impactful: Perpetrator identity and images? *Child Abuse & Neglect*, 137, 106020; Mitchell, K. J., Colburn, D., Finkelhor, D., Gewirtz-Meydan, A., Turner, H. A., & Jones, L. M. (2025). Links between image-based sexual abuse and mental health in childhood among young adult social media users. *Child Abuse & Neglect*, 164, 107471.

¹⁴ Mitchell, K. J., Gewirtz-Meydan, A., O'Brien, J. E., & Finkelhor, D. (2022). Practices and policies around wellness: Insights from the Internet Crimes Against Children Task Force Network. *Frontiers in Psychiatry*, 20, 1-24. <https://doi.org/10.3389/fpsy.2022.931268>; Mitchell, K. J., Gewirtz-Meydan, A., Finkelhor, D., O'Brien, J. E., & Jones, L. M. (2023). The mental health of officials who regularly examine child sexual abuse material: Strategies for harm mitigation. *BMC Psychiatry*. 940. 1-12. <https://doi.org/10.1186/s12888-023-05445-w>; Mitchell, K. J., Gewirtz-Meydan, A., O'Brien, J. E. & Ein-Dor, T. (2024). Exposure to child sexual abuse material among law enforcement investigators: Exploring trauma and resilience profiles. *Psychological Trauma: Theory, Research, Practice, and Policy*. Special Issue on Trauma in the Modern Age of Technology. 1-11. <https://doi.org/10.1037/tra0001804>; Mitchell, K.J. (2023). Trends and New Directions in the Law Enforcement Response to the Sex Trafficking of Minors. University of New Hampshire, Crimes Against Children Research Center, **NMAG-SM-0712486**; Mitchell, K. J., O'Brien, J. E. & Gewirtz-Meydan, A. (2024). A self-assessment tool for helping identify police burnout among investigators of child sexual abuse material. *AJPM Focus*. 3 (4). 1-25. <https://doi.org/10.1016/j.focus.2024.100245>; O'Brien, J. E., Gewirtz-Meydan, A., & Mitchell, K. J. (2024). Emotional wellbeing and cognitive appraisals among law enforcement exposed to child sexual abuse material: A mixed method study. *Criminal Justice and Behavior*. 51(3). 420-439. <https://doi.org/10.1177/00938548231224815>.