EXHIBIT A

Declaration of Jason Sattizahn

I, Jason Sattizahn, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a person over eighteen (18) years of age and competent to testify. I make this Declaration on personal knowledge and in support of my whistleblower disclosure submitted to government bodies of jurisdiction.[1]

2. In this declaration, I am supplementing my declaration dated March 10, 2025 ("original declaration") to address three areas of my disclosure with increased specificity:

   a. The ubiquitousness of Meta employees routinely working directly across Meta's products internally (e.g. working on Virtual Reality and Instagram products), and thus having material knowledge of the work of multiple divisions;

   b. Meta's years-long, company-wide mandate to prioritize increasing engagement from children (often referred to as "TAYA" or "teens and young adults"); and

   c. Meta's long history with avoiding appropriate investments into age verification and parental controls.

3. One aspect of Meta that is not well understood to those outside of the company is that internally, Meta has little to no restriction or segregation between who can and does work across their various products.[2] In fact, Meta's various major products – whether they are Facebook or Instagram – are not siloed as if they are separate, walled-off corporate entities. While each major product can be said to be a part of Meta's "Product-Based Divisions", Meta generally operates like one single integrated company. These divisions share resources, systems, and a top-down strategy employed by Meta. Moreover, every employee at Meta, whether they spend the bulk of their time working on Facebook or Virtual Reality products, all receive a paycheck from Meta. Despite Meta's

[1] Whistleblower Disclosure package submitted entitled: "Protected Disclosure of Harmful and Deceptive Practices at Meta".

[2] "Products" as used here refers to the major Meta product lines; this includes Meta's "Family of Apps" (i.e. Facebook, Instagram, WhatsApp), Reality Labs hardware (Virtual Reality, Wearables) and other company investments, such as Meta AI

explicit, public efforts to make their products appear separate from one another (e.g. Instagram vs. Virtual Reality), inside the company, employees constantly work across Meta's products. This is due to numerous factors – which I will outline below – but the end result is that internally at Meta, there are no hard walls between"Facebook", "Instagram" or "Reality Labs" when it comes to what employees and researchers work on. **This means that employees or researchers in areas like Virtual Reality in Reality Labs, including myself and the five other whistleblowers making this disclosure often have direct, hands-on knowledge and impact on other Meta products such as Instagram.** This also means that when Meta attempts to sidestep questioning about Instagram or Marketplace, as it has in congressional testimony, it is an empty argument and misrepresents the reality. One reason employees have to work so intimately across Meta's products is out of sheer necessity because Meta blends and integrates their products and experiences together with one another in the pursuit of making every offering part of a complete social interaction. For instance, Meta often integrates content from one of their products (e.g. Reels from Instagram) into another of their product's experiences (e.g. Facebook) as a means to increase distribution of content and increase user engagement *across products*. This requires their employees internally to work together irrespective of their product designations, learning how each product works, and building these integrated experiences together.

4. Furthermore, Meta employees work across Meta's products because Meta has intentionally structured multiple teams to explicitly work across their products at the same time. Meta has numerous "horizontal" teams internally at the company. These horizontal teams focus their work on concepts or investments that apply to multiple or all of Meta's products (i.e. Facebook, Instagram, Virtual Reality) at the same time. This means that if you are staffed on one of these teams *or* if your work requires collaboration with these horizontal teams, your work is intimately linked to all of Meta's products at once. One example from my own experience is Meta's Avatar team. Meta's

Avatars allow users to create a digital representation of themselves, and these avatars are used across Meta's products such as Facebook, Instagram, and Virtual Reality. Another example – pertinent to user safety – is Meta's "Central Integrity" team, a group at Meta responsible for addressing a range of harmful behavior across Meta's products, including Facebook, Instagram, WhatsApp, and Messenger. I personally worked with both of these horizontal groups in my time at Meta, as did many other researchers I know.

5. Meta leadership has prioritized working outside of one's immediate team by tying explicit monetary incentives to collaboration. Employees – and especially researchers – are encouraged and rewarded to work across Meta's products, as it is strongly weighted as an indicator of high-performance in the performance review cycles that determine employees' bonuses, salary increases, and promotions. My consistently high performance evaluations at Meta placed a high value and praised me for my work on other products, collaborating and applying research across multiple areas of Meta. Working across teams and products was piecemeal but common over my six years at the company. Rather than offer exhaustive examples of my own work across Meta's products, I will drill down on two specific examples of work I performed between Instagram and Reality Lab's Virtual Reality products together.

6. As described in my previous declaration (p73-75), I was involved in the VR age assurance project, a research study kicked off in July 2022 to understand how Meta can collect more accurate data on the ages of their users. The purpose was not just to understand how to collect accurate age data, but how to do so while respecting user comfort and privacy. This was key because research had years-long evidence showing that Meta did not have accurate age data on their users *across products*, and that Meta users misrepresented their age largely because people do not trust Meta to collect their personal information. Although the origin of the study came from my colleague on the Virtual Reality Youth team, the research study itself was an intimate collaboration with the Instagram Youth

team as well as Youth teams on other products. The Instagram Youth team and their researcher, [redacted], not only helped develop the project, but they committed and planned their own recommendations on how Instagram should alter its age data collection approach based on the findings of the study. Simply put – this was neither an Instagram-only or a Virtual Reality-only project, but rather it was an Instagram *and* Virtual Reality project. This means that in fall of 2022, when Meta Legal interfered and altered the design of the research, they were doing so for both Virtual Reality and Instagram. From the information shared with me by Meta management, including, [redacted], it also means that when the project was cancelled *after* all approvals had been made and a budget had been allocated for the work, there was only one person who had the authority to cancel the project – Mark Zuckerberg. With this sudden cancellation, Meta's ability to use research to collect better age data on users and children was kneecapped for Instagram and Virtual Reality simultaneously. It is important to note that documented feedback from August 18, 2022 from [redacted] from Meta's Legal leadership) on this age assurance project explicitly referred to Frances Haugen's whistleblower disclosure in 2021 as a "leak", further highlighting Meta's internal campaign to demonize and denigrate researchers and employees who became lawful whistleblowers in the pursuit of holding Meta accountable for their actions.

7. In my original declaration, I also discussed my direct involvement in something called "Horizon Feed" and my work to ensure user safety with this new Meta investment. Generally speaking, Horizon Feed was an effort to have people in Virtual Reality be able to digest "feed content" similar to how you would on Instagram but in an immersive environment. When viewing this "feed" while wearing a Virtual Reality headset, users would see diverse content, such as VR-related videos (i.e. gameplay) and content being pulled in from Instagram (i.e. Reels, videos, etc.). The explicit reason for the integration of Instagram in Virtual Reality – given to me and multiple

personnel across teams – given by [redacted] himself was that Instagram's content in VR would provide a strong way to increase user engagement.

8. The integration of new, unrelated content (i.e. Instagram Reels) into a new product (i.e. Virtual Reality) presented significant, foreseeable safety risks as well as likely dangers to users and children that had not been researched (see Alpha declaration p.135). One of Meta's first steps in creating this Horizon Feed was to first integrate user-generated content ("UGC"; short videos, etc.) into the Virtual Reality experience, alongside content from places like Instagram (i.e. pictures, videos). In response, in early 2024, I collaborated across a number of Meta teams to develop a set of research studies that would help us understand how to keep users and children safe when viewing real-time feed content (UGC, Instagram Reels, etc.) within a Virtual Reality space. The research itself focused on how to develop stronger safety tools for users before bringing this feed into Virtual Reality, including (i) effective parental controls, (ii) direct user controls (e.g. improved reporting and feedback on content shown), and (iii) how Meta could proactively alter their ranking algorithm to prevent show harmful content from reaching Virtual Reality users. Out of an abundance of caution at the outset, I advised the teams involved that there was a chance our research may reveal that Meta would need to slow or halt the integration of feed content (i.e. UGC, IG reels, etc.) into Virtual Reality due to safety concerns and safety investments Meta should make before opening this door. Despite the research being fully designed and emphatically supported by all teams involved, the first research study I was kicking off was inexplicably cancelled by [redacted] and [redacted] from Meta leadership on April 8, 2024, with the only explanation given that the project was "not viable." After my repeated requests for more information about the basis for the sudden cancellation, [redacted] stated that the reason the study was shut down was because the project focused on "salsa users" (referring to 10-12 years olds). I emailed [redacted], stating, "I'm confused on this. Horizon Feed *isn't being released to SALSA users at all* (*emphasis added*). This is indicated in the first bullet point

of the research brief I wrote, in the section, 'Business objectives and motivations,' where it says, 'SALSA users (10-12yo) will not see HZ Feed or UGC." If it wasn't clear enough to [redacted] from my email, the research brief also had a second bullet stating, "Feed/UGC is limited to 13+ yo VR users." [redacted] never responded to my email. Effectively, this research on how to make both Instagram and Virtual Reality safer for children, parents, and any adult was shut down without explanation. I understood these events to reflect the priority goals as previously emphasized by [redacted] - that the integration of Instagram into Virtual Reality would increase user engagement, including for children to whom the experience would be released.

9. It is imperative to state that Meta had a years-long, company-wide mandate for employees to focus on increasing the engagement of Meta's products by children (often referred to internally as "TAYA" or "teens and young adults"). Meta's internal documents explicitly state that it is a "...company-level priority for 'Meta's platforms to lead with future generations of youth'" and that they are "...taking proactive approach to Youth (10-17), incl.: 'building for youth', 'legitimacy & advocacy', 'winning over parents', and 'regulatory readiness'." Meta's prioritization to increase engagement of children across their platforms isn't new, but rather, it has been ongoing for years.

10. After I joined Facebook Marketplace in 2018, I recall when Facebook made an explicit push to increase the engagement of children across all of its products. By the time I moved to VR in 2022, I had seen reports on the importance of increasing the engagement of children (TAYA) across Meta's products, including Marketplace, Facebook Gaming, and in particular, Instagram. Most disturbing was the breakneck speed Meta put into boosting children's engagement *after* Frances Haugen's disclosure shined a light on the negative emotional impacts of Instagram on youth.

11. By the time I left Meta in mid-2024, I had seen dozens of internal documents that Meta had produced on the importance of increasing the use of Instagram by children. There are numerous youth-focused documents showing Meta directly focusing on increasing children's engagement with

Instagram (see exhibits to the sworn declarations of the six whistleblowers). To illustrate this point, I will review themes that emerge across these documents:

a. Engagement. Multiple documents show that it is the youngest users on Instagram who drive the highest engagement, and some documents explicitly outline Meta's growth-goals around youth for Instagram. For example, one document from 2023 states, "We need to drive an additional +3.5M DM Teen DAU in developed markets (+6.3%) on top of what we already ship (+2.6%)". Other documents describe which teens are "hardest-to-reach", the barriers Meta is working to overcome the lack of engagement and outlines paths Meta can make to increase engagement with youth. This pattern for technology adoption is well understood in the industry and drives marketing strategies for product launches.

b. Emotion. Numerous documents focus on how Instagram can leverage emotional aspects of Instagram's experience to appeal to youth. One report states. "In order to make IG feel more playful, we need to design for both utility AND emotion." Another report from 2024 states, "Humor is like a cheat code that supercharges the connection and validation [for] teen participants desire…" What is unsettling is that there are multiple reports outlining how Meta will readily invest in researching youth emotions if it can be framed positively and will lead to increased engagement by children. However, when my and others' research attempted to research the entire experience including both the positive and negative emotional aspects of Meta's products, Meta's Legal teams and leadership repeatedly shut the research down, explicitly stating that the data was "too risky" to have.

c. Parental Controls. My own research on Virtual Reality in 2023 showed the low adoption rate of Meta's parental controls, mirroring internal data from Instagram

around the same time showing that only .5% of teen accounts had turned on parental controls. This wasn't a surprise, though – one of my first exposures to cross-product insufficiencies of Meta parental controls was actually when I was still working on Facebook Marketplace from 2018 to 2020. I recall seeing work on Instagram and across Meta's products directly highlighting why parental controls as built were neither sufficient nor effective to keep children safe. Issues included, but were not limited to: (i) the general increase of a burden that digital controls add to parents' (and children's) lives, (ii) parents' lack of time or tech literacy in managing these tools, (iii) a mismatch of how the tools are built with a parent or guardian's preference in managing digital access. More importantly, effective parental controls are predicated on the accuracy of Meta's age data, the assumption that parents have account access, are present with children in parts of set up, and are willing to provide information about their children to Meta.

12. The lack of age verification is the crux of the matter. When Meta offers public assurances about their investments around parental controls (e.g. content controls) and child safety (e.g. age-appropriate content, account restrictions), Meta is misleading the public based on what they don't say. For Meta's efforts to be effective, Meta would need accurate age data. Age data (or associated behaviors triangulating age) would be the explicit way for Meta to flag a user's account as mismatching their age or as some content as being outside of an appropriate range for an account. Unfortunately, to my understanding Meta has never had accurate age data, and from what I was told during my time there, they do not want it because it would trigger additional regulatory compliance inconsistent with their engagement priorities. In fact, while preparing for one of my first research studies in 2018, I was told by a lead Facebook researcher, "Don't trust our internal age data, collect it yourself." Meta claims that they are taking steps to improve experiences for Youth, such as their

September 2024 announcement of "Instagram Teen Accounts." For a detailed explanation of why Meta's efforts in this regard are misleading, see my original declaration (Alpha declaration, beginning at p.139). Important to note, though, is that our Age Assurance project was approved to understand how to collect better age data for Instagram and Virtual Reality in mid-2022. After the project was suddenly shut down as discussed in paragraph 6 above, to my knowledge there was no further research or investment on how to collect better age data on Instagram between 2022 and 2024. It was only in response to congressional government pressure in Mark Zuckerberg's January 2024 Senate Judiciary hearing that something happened. In September 2024, Meta's Head of Product, Naomi Gleit, stated, "We've been working on [Instagram] teen accounts for *several months"* (emphasis added). This statement was significant that for nearly two years after cancelling our age assurance project to improve Instagram age data, *Meta did nothing.* Only after public pressure, did Meta make even meager efforts to appease the public.

13. For years across the company, Meta knew it needed to do more for identity and age verification and chose not to. In fact, nearly a decade ago when I joined Facebook Marketplace, I actually worked directly on the Marketplace identity and age verification project. The idea was simple: create a system where Marketplace users could upload a government ID to validate their identity and age. On one hand, the project was for tax purposes (i.e. someone sells a certain dollar amount on Marketplace). On the other hand, the Facebook Marketing team wanted to use identity and age verification as a way to offer people who verified their identity and age a "trusted person" badge. The goal was that by offering these badges on accounts, people would see that Marketplace users were "Trusted" and user engagement of Marketplace would increase. Unfortunately during my research, I uncovered numerous issues with the age verification process, including: (i) Facebook users simply didn't trust giving Facebook this information, (ii) ID verification could be easily sidestepped by using fake credentials, and (iii) the process gave users false assumptions and

heightened concerns about their safety (e.g. saved ID could be forwarded to the police in instances of harm to users; this is not true). I attempted to delay the release of the "Trusted" badge on Marketplace, citing these concerns as a reason to first improve the verification process. However, the badge was released anyway. Following the release of this identity and age verification workflow, an audit of accounts who had the "trusted" badge showed that Facebook accounts with the "trusted" badge were actually *more* likely to be bad actors and scammers than accounts without the badge. Quite literally, Meta was telling Facebook users that certain accounts were "Trusted" when they were more likely to be causing harm, all because Meta thought this would increase user engagement.

14. One refrain Meta has used to defend claims about its well-known age problem is that verification systems are generally too difficult to develop, which leads to problems like this within their products. Of course, no system is perfect, but it is important to highlight that Meta can do much more to verify the identities and ages of their users for safety reasons, and Meta knows this. The simplest thing to do would be to quite literally pay a statistically representative subset of Meta users to explicitly verify their age across a wide range of ages. In response, Meta could integrate this data and retrain their existing data sets to appropriately flag accounts or content that mismatch a user's age. I personally discussed this approach internally across multiple teams and researchers in 2018, but that clearly did not come to fruition. In fact, even before I joined Meta and worked on projects such as their verification systems, other companies had made advancements in user and account age verification. While I was employed at Sony PlayStation in 2017, Sony actually rolled out a meaningful age verification system. Any time a new adult PlayStation account was created, the account was required to undergo verification via checking against the account holder's credit card. Of course, account creation is just one of multiple places in the experience of a user where age verification may need to occur, but as of 2025, Meta's products do not require consistent verification of adult accounts when new accounts are created. Meta has pointed to their policy to require age

verification if they *suspect* a user is underage as a safety tool but again - what they leave out is that Meta does everything they can to avoid "suspecting" their users are lying about their age.

I do solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the above statement are true to the best of my knowledge.

Date: September 26, 2025

Jason Sattizahn