

FILED UNDER SEAL

EXHIBIT 4

FIRST JUDICIAL DISTRICT COURT

COUNTY OF SANTA FE

STATE OF NEW MEXICO

**STATE OF NEW MEXICO, EX REL.
RAÚL TORREZ, ATTORNEY
GENERAL,**

Plaintiff

**META PLATFORMS, INC.;
INSTAGRAM, LLC; META
PAYMENTS, INC.; and META
PLATFORMS TECHNOLOGIES,
LLC,**

Defendants

NO. D-101-CV-2023-02838

SUMMARY EXPERT REPORT OF JOHN STARR

August 22, 2025

10. CSE refers to when an abuser coerces, manipulates, or deceives a child into engaging in sexual activity.⁶ Like the term CSAM, the term CSE can have different meanings depending on context and jurisdiction, including different forms of content intended to sexualize minors. For the purposes of my opinion, unless I specifically say otherwise, when I refer to the term CSE in my report, I am referring to this broad class of harms, which includes online grooming, online solicitation, sextortion, and minor sexualization.
11. In explaining the methodology underlying my analysis, it is important to note that, to my knowledge, there is no universally accepted “industry standard”⁷ governing what specifically a technology company should do to combat online child safety harms. Moreover, to my understanding, there is no legal requirement in the United States for a technology company to proactively search its platform for CSAM or other illegal or harmful content related to CSE.
12. While several respected organizations — such as Thorn⁸, The Technology Coalition,⁹ and the WeProtect Global Alliance to End Sexual Exploitation Online¹⁰ — have published best-practice frameworks for how online platforms can approach these risks, these frameworks are

⁶ *Child Sexual Exploitation*, NSPCC, available at <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/#what> (last visited Aug. 1, 2025).

⁷ I use the term “industry” as referring to technology companies and ESPs that facilitate information sharing, interactions with others, transactions, and various other activities across the internet.

⁸ See *Sound Practices Guide To Fight Sexual Exploitation Online*, Thorn, available at https://www.thorn.org/wp-content/uploads/2016/08/Thorn_Sound_Practices_Guide.pdf (Aug. 2014).

⁹ See *Child Safety Best Practices*, Tech Coalition, available at <https://www.technologycoalition.org/child-safety-best-practices> (last visited May 12, 2025).

¹⁰ See *Voluntary Principles to Counter Online Child Sexual Exploitation and Abuse*, We Protect Global Alliance, available at <https://www.weprotect.org/wp-content/uploads/11-Voluntary-principles-1-page.pdf> (last visited May 12, 2025); see also *Guide for Tech Companies Considering Supporting the “Voluntary Principles to Counter Online Child Sexual Exploitation and Abuse*, We Protect Global Alliance, available at <https://www.weprotect.org/wp-content/uploads/Guide-to-Voluntary-Principles.pdf> (last visited Jun. 30, 2025).