

FILED UNDER SEAL

EXHIBIT 11

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STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO, EX REL,
RAUL TORREZ, ATTORNEY GENERAL,
Plaintiff,
V. No. D-101-CV-2023-02838
META PLATFORMS, INC.;
INSTAGRAM, LLC;
META PAYMENTS, INC.; and
META PLATFORMS TECHNOLOGIES, LLC,
Defendants.

Confidential - Pursuant to Protective Order

VIDEO-RECORDED DEPOSITION OF FALLON McNULTY
ON BEHALF OF NATIONAL CENTER FOR MISSING &
EXPLOITED CHILDREN

Thursday, July 3, 2025
8:32 AM EST

JOB NO.: 7403114
DENISE DOBNER VICKERY, CRR, RMR

1 be designated as informational rather
2 than an action or referral.

3 BY MR. CHAPUT:

4 Q. Did any ICAC communicate to you
5 that one of the reasons they stopped taking
6 those reports was because they needed to secure
7 a search warrant to view the content?

8 A. Again, with the additional
9 context, because of the reasons that I have
10 previously stated.

11 Q. So that's a yes, they expressed
12 that that was one of the reasons they asked to
13 stop receiving those reports?

14 MR. RUTHERFORD: Objection.
15 Asked and answered several times now.

16 MS. SINGER: And
17 mischaracterizes testimony.

18 THE WITNESS: Yes. Again,
19 there was a concern of the validity of
20 reports for multiple reasons. One of
21 which was the prevalence of content that
22 was being reported by Meta Platforms
23 which had not been indicated as being
24 viewed or publicly available by Meta.

25 And time and time again we

1 heard from law enforcement that they
2 would seek the appropriate legal process
3 or search warrant to be opening and
4 reviewing that content, only to find a
5 meme or a viral image or other
6 non-pertinent content that Meta had not
7 annotated.

8 MR. CHAPUT: Move to strike
9 everything after "yes."

10 MR. RUTHERFORD: Opposed.

11 MS. SINGER: Opposed.

12 BY MR. CHAPUT:

13 Q. Earlier we looked at a number of
14 features that Meta rolled out in the lead-up to
15 end-to-end encryption that you testified NCMEC
16 agreed were beneficial to fighting child sexual
17 exploitation; is that fair?

18 MS. SINGER: Objection.

19 Mischaracterizes testimony.

20 THE WITNESS: NCMEC was
21 supportive that those were, yes,
22 meaningful child safety tools.

23 BY MR. CHAPUT:

24 Q. When NCMEC was trying to
25 understand the reason behind the drop in Meta in