

FILED UNDER SEAL

EXHIBIT 34

Message

From: Michael Salem [/O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=]
Sent: 4/23/2021 9:34:15 PM
To: Miki Rothschild []@fb.com]; []@fb.com]; []@fb.com]; Betty Li []@fb.com]; []@fb.com]
Subject: FW: Youth Family Data Circle - State of Youth Integrity

Restricting to [] Betty, [] and me to spare others irrelevant pings.
Adding Miki and []

I'm pretty sure everyone on this thread is aware of the concerns around whether we are adequately staffed to support Child Safety. (This has come up in the context of specific gaps in DS support, which I am working to address, but I believe XFN support overall is a concern.)

Meanwhile, IG is spinning up youth initiatives that are being cast as a company-wide priority. These will put more pressure on the Child Safety team, and perhaps create more expectations for the youth cut of other problem areas (e.g. B&H).

As you see below, [] is raising concern about whether there is adequate awareness of our capacity constraints, and in a separate thread [] has suggested I raise this with Miki and [] So here we are. :)

I'm curious, is there a plan to request additional capacity to provide more support, and/or in what org that capacity should live? If not, should we make that a priority and who should lead it? I'll tag @Miki to put an individual on the spot. :)

Best, Michael

From: []@fb.com>
Date: Friday, April 23, 2021 at 12:48 PM
To: Michael Salem <[]@fb.com>, Betty Li <[]@fb.com>, []@fb.com>, Ronan Bradley <[]@fb.com>, Mike Winters <[]@fb.com>, []@fb.com>, []@fb.com>, []@fb.com>, Kristin Hendrix <[]@fb.com>, Brady Lauback <[]@fb.com>, Pratiti Raychoudhury <[]@fb.com>, []@fb.com>, []@fb.com>, []@fb.com>, []@fb.com>, []@fb.com>
Cc: []@fb.com>, []@fb.com>, Moira Burke <[]@fb.com>, []@fb.com>, []@fb.com>, []@fb.com>, Veronika Belokhvostova <[]@fb.com>, []@fb.com>
Subject: Re: Youth Family Data Circle - State of Youth Integrity

Thank you for the great presentation today, and for this summary Michael.

I'm very concerned about the lack of capacity, especially given our efforts on Youth across the company. I don't believe this is well understood by leadership and would like us to raise awareness of this, so we can advocate to staff the teams better. Please let me know how I can help here.

From: Michael Salem <[REDACTED]@fb.com>
Date: Friday, April 23, 2021 at 3:38 PM
To: Betty Li <[REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]
[REDACTED]@fb.com>, Ronan Bradley <[REDACTED]@fb.com>, Mike Winters <[REDACTED]@fb.com>, [REDACTED]
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Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, Moira Burke <[REDACTED]@fb.com>, [REDACTED]
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Subject: Re: Youth Family Data Circle - State of Youth Integrity

Thanks to everyone who participated in this and to [REDACTED] and [REDACTED] for prepping some quips and leading discussion.

While our objective did not include creating any action items, as a form of summary I would like to call out some of the key risks/issues that stood out to me (others can feel free to add to this) :

1. We use central age prediction to identify minors and adults. To our awareness, there is no effort to address adversarial evasion of age prediction. (It's worth calling out an analogy to location prediction, where historically there has been a team to address location prediction evasion, though there is recent discussion of whether that team should find a new home or even continue.)
2. Along the lines above, there is no focused effort to understand/address adults compromising the accounts of minors to facilitate abuse.
3. We don't know how robust age prediction is to (evolving) product contexts, e.g. E2EE, ePD and other potential privacy regulations, AP+, MSGR-only accounts (though are these being deprecated?), etc.
4. We do not have a specialized focus on minors within B&H.
5. We do not really have any MSGR coverage within B&H (except this may find a home in the future with an Unwanted Interactions archetype).
6. (Implicitly, to my awareness, we do not have a specialized focus on minors within any other problem areas in Central Integrity.)
7. Age verification (for under 13) has a big backlog and demand is outpacing supply.
8. Age verification has no ground truth to give robust measurement of effectiveness. Some reviews lack market specialization.
9. Perhaps the biggest issue: progress on these and any other issues not raised is hampered by lack of capacity. Indeed, we didn't dwell so much on gaps on existing areas of coverage but they are substantial as well. Central Integrity has 1 DS on Child Safety and we are working to get a bit more support, but addressing gaps will require a more robust XFN effort. We also didn't discuss this as a group, but if there are plans to build a new, youth-oriented app, that (like any another new surface) will probably need dedicated integrity focus.

Best, Michael

From: Betty Li <[REDACTED]@fb.com>
Date: Wednesday, April 21, 2021 at 4:36 PM
To: Michael Salem <[REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]
[REDACTED]@fb.com>, Ronan Bradley <[REDACTED]@fb.com>, Mike Winters <[REDACTED]@fb.com>, [REDACTED]
[REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>, Kristin Hendrix <[REDACTED]@fb.com>, Brady Lauback <[REDACTED]@fb.com>, Pratiti Raychoudhury
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Belokhvostova <[REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: Re: Youth Family Data Circle - State of Youth Integrity

thanks Michael and [REDACTED] looking forward to this!

From: Michael Salem <[REDACTED]@fb.com>
Sent: Wednesday, April 21, 2021 3:06 PM
To: [REDACTED]@fb.com>: [REDACTED]@fb.com>, Betty Li <[REDACTED]@fb.com>,
Ronan Bradley <[REDACTED]@fb.com>, Mike Winters <[REDACTED]@fb.com>: [REDACTED]@fb.com>; [REDACTED]
[REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]@fb.com>, Kristin Hendrix <[REDACTED]@fb.com>,
Brady Lauback <[REDACTED]@fb.com>; Pratiti Raychoudhury <[REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]
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Cc: [REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; Moira Burke <[REDACTED]@fb.com>; [REDACTED]
[REDACTED]@fb.com>; [REDACTED]@fb.com>; [REDACTED]@fb.com>; Veronika Belokhvostova
<[REDACTED]@fb.com>; [REDACTED]@fb.com>
Subject: Re: Youth Family Data Circle - State of Youth Integrity

Thanks for sharing these [REDACTED]

I set expectations with [REDACTED] and [REDACTED] that our goal with this meeting was basically to share context with folks on what the current state of integrity is wrt youth. However, I think it might be nice for folks to air any additional objectives in advance in case it helps us put things in context.

For instance, one question on my mind is: having in mind we'll want to provide some additional support for integrity wrt youth, roughly what we think that looks like and in what org should it live. I don't think we should talk about this in this meeting, but I think it's a lens through which to read the current state of things.

Best, Michael

From: [REDACTED]@fb.com>
Date: Wednesday, April 21, 2021 at 1:53 PM
To: [REDACTED]@fb.com>, [REDACTED]@fb.com>, Betty Li
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Kristin Hendrix <[REDACTED]@fb.com>, Brady Lauback <[REDACTED]@fb.com>, Pratiti Raychoudhury
<[REDACTED]@fb.com>, Michael Salem <[REDACTED]@fb.com>, [REDACTED]@fb.com>, [REDACTED]
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Cc: [REDACTED]@fb.com>, [REDACTED]@fb.com>, Moira Burke <[REDACTED]@fb.com>, [REDACTED]
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Belokhvostova <[REDACTED]@fb.com>, [REDACTED]@fb.com>
Subject: RE: Youth Family Data Circle - State of Youth Integrity

Hi,

Sharing 2 context/preread docs ahead of our discussion on Friday:

1. [Underage and Age Verification 1-Pager](#)
2. [I2 and Youth data summary](#)

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT :MDL NO.
ADDICTION/PERSONAL INJURY PRODUCTS :4:22-MD-
LIABILITY LITIGATION :3047-YGR

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
SPRING STREET COURTHOUSE

COORDINATION PROCEEDING SPECIAL TITLE :
(RULE 3,400) :
:
SOCIAL MEDIA CASES :
----- :LEAD CASE
:NO. FOR
THIS DOCUMENT RELATES TO: :FILING
:PURPOSES
STATE OF TENNESSEE, ex rel, JONATHAN :22STCV21355
SKRMETTI, ATTORNEY GENERAL and :
REPORTER, :
:
V. :
:
META PLATFORMS, INC., and INSTAGRAM, :
LLC :
:
CASE NO. 23-1364-IV :

DEPOSITION UNDER VIDEO EXAMINATION OF
VAISHNAVI JAYAKUMAR
JANUARY 30, 2025
VOLUME I

Videotaped deposition of
VAISHNAVI JAYAKUMAR, taken pursuant to notice, was
held at the law offices of Baker Botts, LLP, 30
Rockefeller Plaza, New York, New York, beginning at
9:24 a.m., on the above date, before Michelle L.
Ridgway, a Registered Professional Reporter,
Certified Court Reporter (NJ-CCR # XI02126),
Certified Realtime Reporter, Certified Shorthand
Reporter (CA-CSR # 14592), and Notary Public.