

FILED UNDER SEAL

EXHIBIT 22

IN THE 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.

VIDEOTAPED DEPOSITION OF
MARK ZUCKERBERG
HIGHLY CONFIDENTIAL
PURSUANT TO PROTECTIVE ORDER
MONDAY, JULY 14, 2025
PALO ALTO, CALIFORNIA

Reported By:

KATHLEEN A. MALTBIE, STENOGRAPHIC REPORTER
California CSR 10068, Nevada CCR 995, Texas CSR
12212, RPR-RMR-CRR-CCRR-CLR-CRC-RDR

1 urging us not to implement end-to-end encryption.

2 Q. Okay. Put that document aside.

3 You were committed to implementing
4 end-to-end encryption in 2019, correct?

5 A. I'm not sure what you mean by that. I
6 mean --

7 Q. You weren't --

8 A. -- basically --

9 Q. You weren't -- I'm sorry. I didn't mean
10 to interrupt you.

11 A. Go for it.

12 Q. Okay. You weren't going to abandon that
13 idea once you had announced it, right?

14 MR. SCHMIDT: Objection.
15 Characterization.

16 THE WITNESS: In general, yeah, once we
17 decide that we're going to do something, unless
18 there's a good reason to change it, we're not going
19 to change. But -- but part of what we were trying
20 to do was -- end-to-end encryption is a very strong
21 feature that protects people's privacy and security.
22 We knew that, when we implemented it, we would have
23 to put in place different tools to help identify
24 some bad actors across the system.

25 So we did want to make sure that we had