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EXHIBIT 13

Expert Summary of Opinions

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1. Qualifications

I earned my MSW in social work at Smith College, School for Social Work, in 2010 and my Ph.D. at the University of North Carolina at Chapel Hill in 2017. My bachelor's degree is in psychology/advertising from the University of Texas (2006). Since 2018, I have been a consultant at The National Criminal Justice Training Institute, Fox Valley Technical College, and Faculty Affiliate, at The University of New Hampshire, Crimes against Children Research Center. I became an Associate Professor at the University of Texas at Arlington, School of Social Work in 2024.

I have published literature relevant to technology-facilitated abuse and child sexual exploitation in multiple peer reviewed publications including Journal of Adolescent Health, Frontiers in Psychiatry, Child Abuse & Neglect, and Journal of Human Trafficking. See Attachment A (curriculum vitae). Recent grants I have received include those from the Office for Victims of Crime, The National Institute of Justice, and the National Center for Injury Prevention and Control regarding human trafficking and child sexual exploitation.

In my position as an associate professor and researcher, I regularly examine large data sets with variables related to child sexual exploitation and abuse, and interview subject matter experts including members of the criminal justice community, service providers, survivors, and training/support agencies. Collectively, these experiences have given me insight into, among other things, the substantive issue of commercial sexual exploitation of children, including trajectories of abuse and survivorship.

A current copy of my true and correct curriculum vitae which includes my publications is attached to this summary as Attachment A. I have not testified as an expert at trial or by deposition during the past four years. I am being compensated \$450 per hour.

2. Methodology

In forming my opinions, I reviewed relevant scientific literature, government documents, litigation documents, and deposition transcripts. See Attachment B (Considered Materials List). I also spoke with Dr. Dana Weiner, Senior Policy Fellow at Chapin Hall; Undercover Investigator (name known to Defendants), Special Investigations Unit Criminal Intelligence Analyst, NMDOJ; Benjamin Zwiebel, special agent, ICAC; Kathleen Carmona, Barbie Montaya, and Cinthia Sisneros, Victim Advocates, NMDOJ; and Tracy Kemp and Erin Armijo, members New Mexico Kids Code Coalition. The litigation documents I reviewed and considered are ones provided to me based on topics I identified as relevant and have informed my opinions in this case. I have also reviewed the Expert Summary of Opinions of an Undercover Investigator (name known to Defendants).

3. Opinions

My findings and conclusions are held to a reasonable degree of professional and scientific certainty and are based on my knowledge, skill, experience, research, and training in the field of social work, and particularly my work involving technology-facilitated sexual abuse and child sexual exploitation. See Attachment A. Technology-facilitated sexual abuse (TFSA) refers to the acts of sexual harassment, exploitation, and abuse that occur partially or entirely online. This can include a wide range of harmful behaviors including image-based sexual abuse, the creation or dissemination of child sexual abuse material (CSAM), deepfakes, sextortion, cyberstalking,

cyberflashing, and online sexual harassment (e.g., online sexual solicitations). In some cases, TFSA includes child sexual exploitation and the commercial sexual exploitation of children. Child sexual exploitation (CSE) is a severe form of child abuse in which an individual or group takes advantage of a power imbalance to manipulate, deceive, or coerce an individual under the age of 18 into sex and/or sexual activities. This exploitation can occur in exchange for something the victim needs or wants including food, shelter, or financial gain. In some cases, these exchanges result in the financial gain or increased social standing of the perpetrator (e.g., “John”) or facilitator (e.g., “pimp”). CSE is closely related to the commercial sexual exploitation of children (CSEC), which is a term used to describe the exchange of sex or sexual acts for goods, services, drugs, money, or other items of value by an individual under the age of 18. If you can think of my work as a funnel, consider TFSA at the top- or the broadest- of the topics outlined above, CSE in the middle, and CSEC as the narrowest. Interestingly, differential research has been focused on CSEC compared to the other topics outlined, as CSEC crimes tend to be the most horrific and therefore the most compelling to funders and the general public. In this summary, I will use these terms purposefully, and the term “children” to describe all individuals under the age of 18, unless otherwise specified.

I reserve the right to revise or supplement my report based on additional information provided by Meta or other third parties in this litigation, my own subsequent experience, and any expert reports submitted by Meta.

The opinions I will provide in this case are:

- a. That in 2023 15.6% of individuals under the age of 18 in the United States, or 11.5 million children, experience TFSA, and 1.7% of children in the United

s. That the harms from TFSA, CSE, and CSEC are grossly underreported.³¹

Program Planning, 33, 311-316. doi: 10.1016/j.evalprogplan.2009.06.018; Hodge, D. R. (2008). Sexual trafficking in the United States: A domestic problem with transnational dimensions. *Social Work*, 53, 143-152. doi: 10.1093/sw/53.2.143; Jones, L. M., O'Brien, J. E., Colburn, D., McKinney, K., & Martin, L. (2024). Youth perspectives on commercial sexual exploitation: Results from pre- and post- program surveys administered by the Not a Number trafficking prevention curriculum. *Research in Human Development*. 20 (2-3). 1-20. <https://doi.org/10.1080/15427609.2024.2412427>; Landers, M., McGrath, K., Johnson, M. H., Armstrong, M. I., & Dollard, N. (2017). Baseline characteristics of dependent children who have been commercially sexually exploited: Findings from a specialized treatment program. *Journal of Child Sexual Abuse*, 26(6), 692–709. <https://doi.org/10.1080/10538712.2017.1323814>; Martin, L., Rider, G. N., Johnston-Goodstar, K., Menanteau, B., Palmer, C., & McMorris, B. J. (2021). Prevalence of trading sex among high school students in Minnesota: Demographics, relevant adverse experiences, and health-related statuses. *Journal of Adolescent Health*, 68(5), 1011–1013. <https://doi.org/10.1016/j.jadohealth.2020.08.021>; McClain, N. M., & Garrity, S. E. (2011). Sex trafficking and the exploitation of adolescents. *Journal of Obstetric, Gynecologic, & Neonatal Nursing*, 40(2), 243-252. doi:10.1111/j.1552-6909.2011.01221.x; O'Brien, J. E., Jensen, T., Mitchell, K. J., & White, K. (2023). Commercial Sexual Exploitation Outcomes in a Community Sample of Youth. *Journal of Adolescent Health*. 72(1). 51-58. <https://doi.org/10.1016/j.jadohealth.2022.08.028>; O'Brien, J. E., DellaPenna, R., Gonzalez-Pons, K., Mitchell, K. (2024). Medical first responder's needs and efforts to combat the commercial sexual exploitation of children. *Journal of Human Trafficking*. 10 (4), 606-616. <https://doi.org/10.1080/23322705.2022.2061280>; O'Brien, J.E., McKinney, K., Martin, L., & Jones, L.M. (2024). Help-seeking among children impacted by commercial sexual exploitation: A scoping review. *Trauma, Violence, & Abuse*. 1-22. <https://doi.org/10.1177/1524838024125>; O'Brien, J.E., White, K., Rizo, C.F. (2017). Domestic minor sex trafficking among child welfare-involved youth: An exploratory study of correlates. *Child Maltreatment*, 22(3), 265-274. <https://doi.org/10.1177/1077559517709995>; Wagner, A., Lockwood, S., Farrell, A., Cuevas, C., O'Brien, J., Pfeffer, R., Kolnik, J., & Lincoln, A. (2024). Understanding the Retrospective and Current Health Care Needs and Service Experiences of Adult Survivors of Minor Sex Trafficking. *Research in Human Development*, 21(2-3), 135-158.

³¹ Farrell, et al. (2025). DOJ Report: Understanding the physical and psychological health and wellness needs of minor sex trafficking victims. <https://cssh.northeastern.edu/crj/understanding-the-physical-and-psychological-health-and-wellness-needs-of-minor-sex-trafficking-victims/>; Greenbaum, V. J. (2014). Commercial sexual exploitation and sex trafficking of children in the United States. *Current Problems in Pediatric and Adolescent Health Care*, 44(9), 245–269; Hodge, D. R. (2008). Sexual trafficking in the United States: A domestic problem with transnational dimensions. *Social Work*, 53, 143-152. doi: 10.1093/sw/53.2.143; O'Brien, J.E. & Preble, K. (2023). Understanding and intervening with survivors of domestic minors sex trafficking: An application of Social Cognition Theory. *Clinical Social Work*. 52, 307-315. <https://doi.org/10.1007/s10615-023-00877-z>.