

FILED UNDER SEAL

EXHIBIT 21

Meta Ad Final Report

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Scope of Work

On August 1, 2024, the following scope of work was provided:

1. Utilizing the Meta Platform, identify the process for posting and creating ads.
2. Identify the cost associated with the posting of ads.
3. Access the vulnerabilities of the “Ads Manager” Account process required to set up for advertising on Meta.
4. Utilizing the Meta Platforms, identify the policies surrounding appropriate uses of ads, the scopes of which ads are allowed, and identify what are violations of ads policies.
5. Review Meta “Ad Library” for consistency and compliance in using these policies as they relate to violations of policies surrounding harmful content related to youth.
6. Generate TEST ads promoting the use of drug parties/usage, alcoholic parties/usage, self-harm, bullying, Vaping, Smoking, dating and gambling, gun violence, school violence, racism, and eating disorders that used images generated by Meta’s AI tool.
7. Generate TEST ads with a targeted ad audience of a minor.
8. Ensure that each ad generated is only a “TEST AD” and does not run on Meta platforms. TEST Ads must be canceled before their scheduled publication date.

The original completion date was August 30, 2024. The contracted completion date was later amended to September 9, 2024.

Meta Business Page Setup and Ads Research

Prior to setting up a business account, a personal Facebook account must be set up first. A summary of our business account setup process can be seen below, but a more detailed documentation can be found through the file “Business Page Setup and Ad Research”.

1. Through the personal Facebook account, the option to “Create new profile or Page” is selected. This will allow us to create a public page that will have the ability to post advertisements on Meta platforms.
2. Once the Meta business account has been set up, users will have access to the Ads Manager.
3. There are two methods of posting advertisements: (1) directly through the business page’s Ad Center, which does not allow for ad scheduling, but does allow for ad campaign date range, and (2) through the Ads Manager, which does allow for ad scheduling as well as setting up an ad campaign date range. You may see detailed documentation within “Running Test Ads Procedure.”
4. The cost for these advertisements vary, depending on the set budget for the ad. The daily range may be set anywhere in between \$1 - \$500 USD, with \$5 USD as default. The cost is directly correlated with the estimated Account Center accounts that the advertisement reaches and the estimated number of replies.

Ad Library Exploration

During the time span of this research, the Meta ad library was reviewed for consistency and compliance in using these policies as they relate to violations of policies surrounding harmful content related to youth.

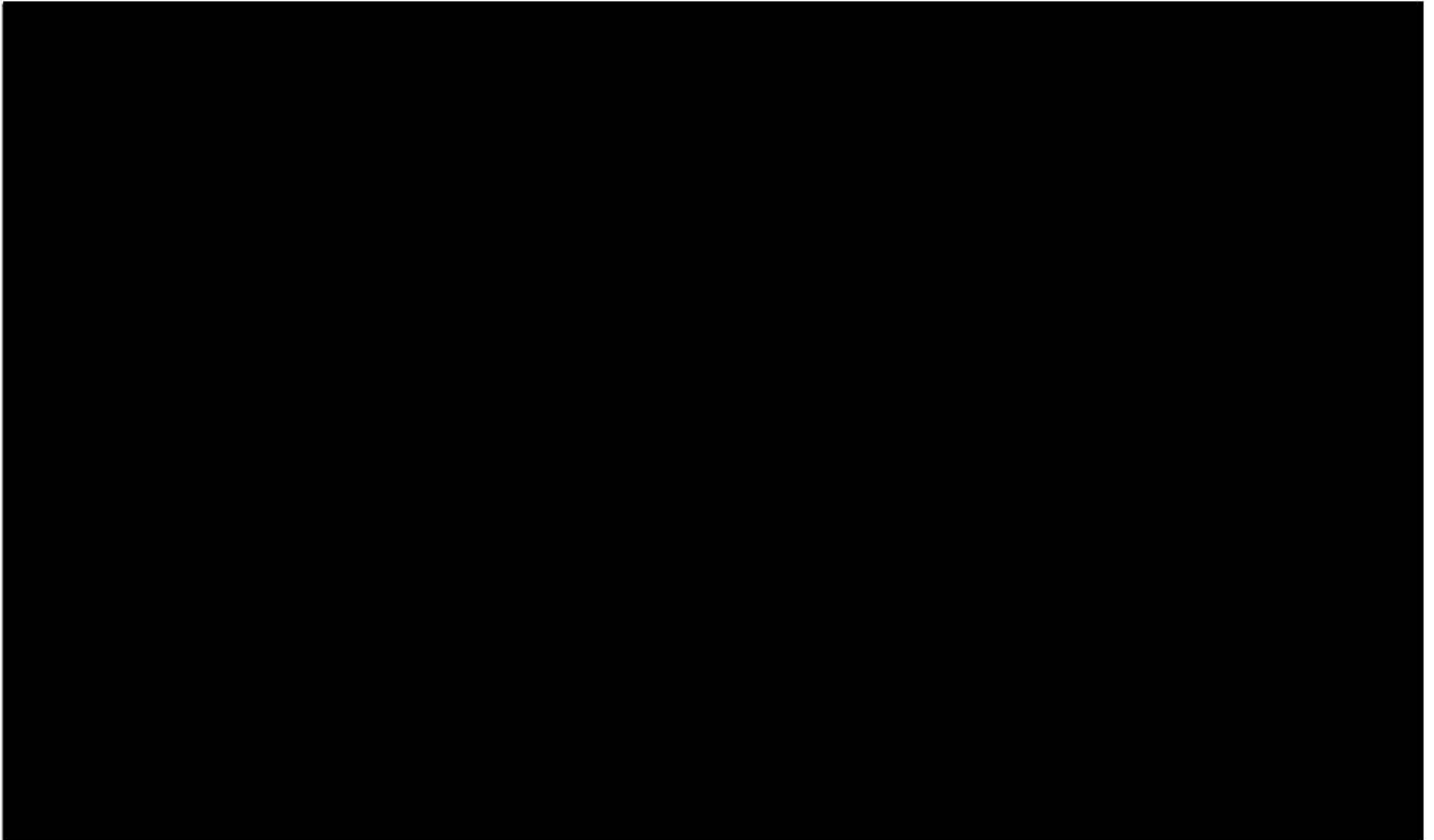
While reviewing the Meta ad library, a few points were identified that were worth noting:

- Advertisements with the audience set to the United States do not show the target demographics. This means that we are not able to see what group the ads are targeting unless encountered directly on the Meta platforms through the “Why Am I Seeing This Ad” option.
- For advertisements observed on the Meta platform, the “Why Am I Seeing This Ad” shows the targeted age, specific location, and gender (if applicable). This same data is not visible to United States advertisements in the ad library.
- The Meta ad library also does not provide a filter for age or gender as the target audience. Thus, we were unable to categorize many of the observed drinking or gaming/gambling ads that are permitted for an audience above age 18, as the target age is not disclosed.

Due to these constraints, the exploration was limited.

Generating Test Ads

All ads were generated through Meta AI, with occasional texts added through Canva. Through this process, the following should be noted (also documented within the "Progress Updates").



Running Test Ads

The method used for running test ads was the Meta Ads Manager. More detailed documentation of this process can be found in the file "Running Test Ads Procedure" under the section "Creating Ads On Meta Ads Manager."

To better understand the Meta structure and file-level terminology, the following must be understood:

- Campaigns contain one or more Ad Sets.
 - This is the level where the objective is defined, selecting the campaign details such as 'Buying type' and 'Campaign objective'.
- Ad Sets contain one or more Ads.
 - This is the level where the share settings of the ads are defined. This includes how, when, and where to run, as well as setting the audience (location, gender, age), budget, advertisement schedule, and placements.
- Ads are the individual media that is created for the audience.

For all advertisements, the publication dates were scheduled at least one day in advance and monitored to prevent the advertisements from actually publishing. This was set up at the Ad Set level.

Requirements for running ads include the following: a phone number and a payment method.

[REDACTED]

Other settings for the test ads include the following:

- All ads' outbound websites led to [HYPERLINK "https://example.com/" \h].
- The audience for the ads was set to
 - Location: United States
 - Age: 13 - 17
 - Gender: All genders
- All ads' conversion locations (where the engagement is driven) were either set to "Website" or "Facebook Page" on the Ad Set level.
 - Other options, namely "Messaging apps" and "Calls" did not permit the audience setting to be set under age 18.

Ad Result

Twenty-one ads were run on Meta as test ads, and all ads were scheduled at least 1 day in advance to allow enough time for Meta to review the ads.

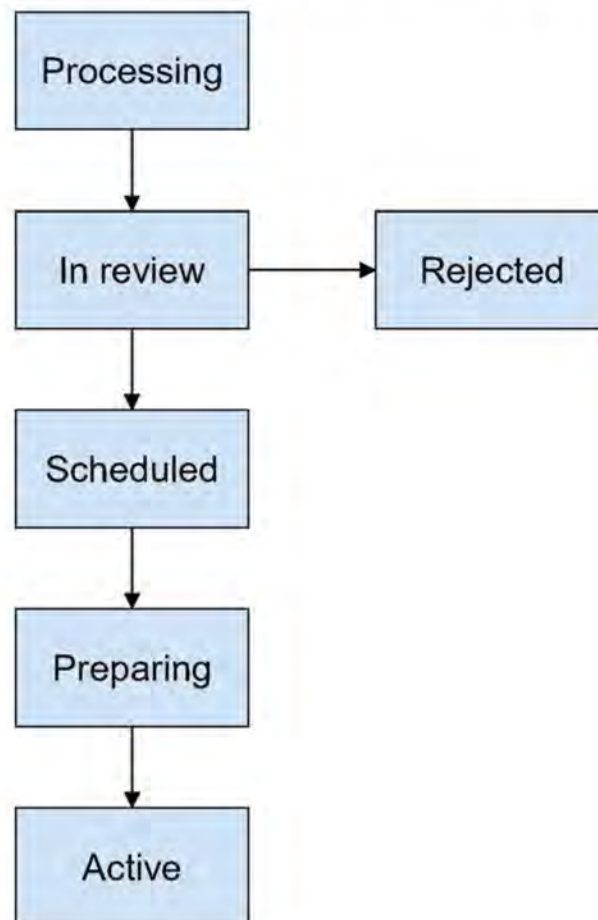
The titles of the tested ads are as follows (internal reference only):

- bully-school-violence_01
- dating_001
- dating_002
- drinking_02
- drinking_04
- drug_01
- drug_02
- ed_01
- ed_02
- ed_03
- gambling_01
- gambling_02
- gambling_03
- gn_02
- gn_03
- gun_01

- racism_02
- self-harm_01
- self-harm_02
- vaping_01
- vaping_02

The relevant ad delivery statuses that were observed during the test ad runs are seen in the section below:

- **Processing:** The ad is being updated with the changes you made. This usually takes a few minutes, but some updates may take up to 8 hours. Once processing is complete, your ad status will be updated to confirm if it's now active, in review, or has errors.
- **In review:** The ad is in review to make sure it complies with Meta Advertising Standards. Following this review, your ad will become active and begin running as scheduled.
- **Scheduled:** The ad set is scheduled to run at a future date. You can edit the ad set to change its schedule.
- **Preparing:** The ad successfully passed review, and the delivery system is now matching it to the right bid and audience, so you can start seeing impressions. Once it has at least one impression, it will enter the learning phase or become active.



If Meta rejects the ad, it means that the “ad can’t run because it doesn’t comply with Meta Advertising Standards.” However, if approved while scheduled, it would automatically enter the “Scheduled” status, then the “Preparing” status once the scheduled time approaches. For additional visualization on what the review process looks like, see figure below.

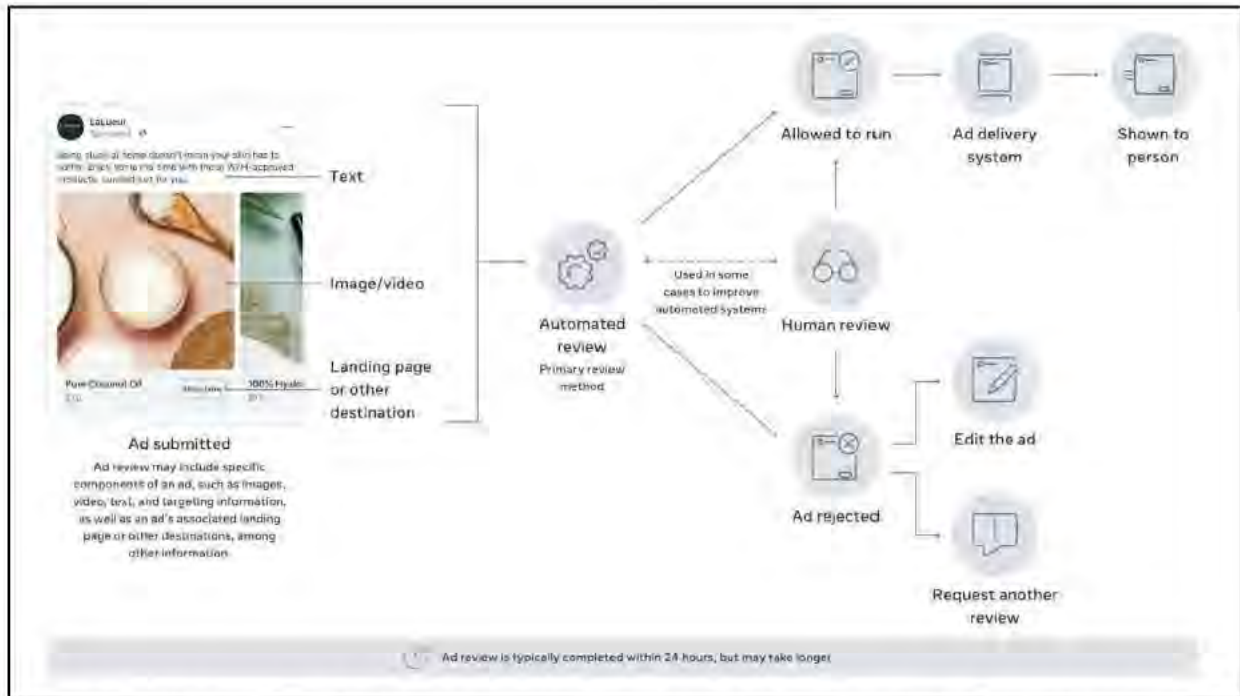


Figure Source: [[HYPERLINK "https://www.facebook.com/business/help/204798856225114"](https://www.facebook.com/business/help/204798856225114) \h]

Twenty-one ads were run on Meta as test ads, all of which were approved by Meta. For detailed documentation on the ad results, see the document “Ad Result.” Each of these listings includes the Meta AI prompt that generated the image, the relevant policy/policies that the ad violated, the ad result, and the stage at which the publishing process was paused at.

Conclusion and Potential Expansions

Twenty-one advertisements that did not comply with Meta Advertising Standards were generated and scheduled to run on the platform. All 21 ads were approved, with 18 paused on the status “Scheduled” and 3 paused on the status “Preparing”. These ads were generated with the intentions of violating Meta ad policies in regards to drug parties/usage, alcoholic parties/usage, self-harm, bullying, vaping, smoking, dating and gambling, gun violence, school violence, racism, and eating disorders.

With additional time, there are various ways this work could be expanded or explored.

Though the focus for the ads in the Meta Ad Library was broadly on those targeting youths overall, the demographic that the ads targeted did not appear to be accessible within the Meta

Ad Library. However, it was observed that there is an exception with ads where the EU transparency principle is applied. Therefore, with additional time, the EU transparency feature could be utilized to further understand and analyze ads to see if certain advertisements are targeting minors or not. Solely focusing on these ads would be a limitation, but could provide valuable insights when comparing the rates of compliance for:

- active ads with an audience that are set to ages 18+
- active ads with an audience that includes ages 13-17 in their target age range

This may assist in exploring if the reviewing process for ads targeting adults actually differs from the reviewing process for ads with minors included in the targeted pool, as Meta does allow the advertising of certain products and services to audiences 18+ but not to minors.

This also raised the following question regarding Meta's reviewing process during the test runs: what exactly does the process look like on Meta's side?

Meta shares a flowchart for this review process but does not elaborate on how the images and videos in prospective ads are evaluated. During the test runs, the text in some of the advertisements are clearly noncompliant to Meta's advertising policies. Since Meta AI is able to flag and detect certain keywords, the platform's ad reviewing process would likely benefit from implementing an Optical Character Recognition (OCR) as well as additional manual review in order to detect the same keywords that were flagged by Meta AI.

What is an OCR? An OCR is a form of technology that recognizes text from images and converts it into a machine-readable format. For example, when images of documents are scanned and uploaded, some software may be able to immediately recognize that there is text present in the scanned file and then process that. With an OCR, Meta could have likely detected that the test ad "dating_001" includes the phrase "sugar baby" within the image. [[HYPERLINK "https://www.facebook.com/business/help/765622867361201"](https://www.facebook.com/business/help/765622867361201) \h] specifically states that the advertising of "dating with casual sexual themes or monetary or other financial transactions, such as mail-order brides or 'sugar babies'" is not permitted. Thus, when "sugar baby" is detected, the ad could be immediately rejected.

However, since they do not have this in place, it would be interesting to see what Meta is implementing when reviewing images and videos in order to detect ads violating advertising policies.