

FILED UNDER SEAL

EXHIBIT 57

EXPERT SUMMARY OF OPINIONS

Dylan Pell, LMSW, MPH

July 11, 2025

I. Qualifications

I earned my Master of Public Health and my Master of Social Work in 2017 at New Mexico State University. I completed my Bachelor of Arts in Anthropology and Psychology at the University of New Mexico in 2010.

I have worked as the Mental Health Epidemiologist for the New Mexico, Department of Health (NMDOH) since 2020. Prior to that I worked first as a social worker (2017-2019) and then as Program Director (2019-2021) at Community Access in the Bronx, New York, an organization providing supportive housing and social services for people living with mental health concerns.

My work at the NMDOH includes analyzing population health data among New Mexico residents and producing statistical reports on the mental health of New Mexicans. This work involves using statistical software, attending and/or presenting at community meetings and professional conferences, drafting reports and presentations, and collaborating with scientists on the development and implementation of new studies.

In performing this work, I regularly consult with individuals at state and territorial public health offices across the country, county government offices, educators, mental health providers and advocates, and research institutions such as the University of New Mexico.

I regularly present my data analysis to such organizations as the Council of State and Territorial Epidemiologists (CSTE), the New Mexico Public Health Association, the New

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 that I will provide in this case are:

- a. That there is a national mental health crisis amongst our youth.⁶
- b. That there is a mental health crisis among adolescents in New Mexico.⁷ Youth mental health has become a public health crisis in New Mexico because the prevalence of adolescent mental health symptoms and suicide is so high. This crisis necessitates a public health response.
- c. That I have seen the impacts of this crisis in my research and experience as a mental health epidemiologist in New Mexico.
- d. That based on my experience and the data and information available to me, social media, including Facebook and Instagram, is a significant contributing factor in

⁶ See e.g., Social Media and Youth Mental Health: The U.S. Surgeon General's Advisory, **NMAG-SM-0231171**; United States. Public Health Service. Office of the Surgeon General, Center for Mental Health Services (US). Mental health: A report of the surgeon general. Department of Health and Human Services, US Public Health Service (1999); White House Strategy to Address our National Mental Health Crisis. <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2022/03/01/fact-sheet-president-biden-to-announce-strategy-to-address-our-national-mental-health-crisis-as-part-of-unity-agenda-in-his-first-state-of-the-union/>; Haidt, J. (2024). The Anxious Generation, Allen Lane.

⁷ See e.g., State of Mental Health in New Mexico (2024 Update) Presentation, **NMAG-SM-0030792**; State of Mental Health in New Mexico Presentation (Approved), **NMAG-SM-0240734**; State of Mental Health in New Mexico 2022 (Final), **NMAG-SM-0243512**; 2023 Youth Risk Behavior Survey Results, New Mexico Middle School Survey, 10-year Trend Analysis Report, **NMAG-SM-0253849**; 2023 Youth Risk Behavior Survey Results, New Mexico High School Survey, 10-year Trend Analysis Report, **NMAG-SM-0254003**; Co-morbid Substance Use and Mental Health Issues in New Mexico, **NMAG-SM-0041121**.

the mental health and safety of adolescence in New Mexico, including being a significant contributing factor in the current mental health crisis amongst youth in our state.

- e. That the following conditions occur in adolescents and children:
 - i. Problematic Social Media Use/Addiction
 - ii. Depression
 - iii. Anxiety
 - iv. Body Dysmorphic Disorder
 - v. Eating Disorders
 - vi. Sleep Deprivation
 - vii. Self-harm
 - viii. Suicide-related Behaviors and Death
 - ix. ADHD
 - x. Bullying
 - xi. Trauma
- f. That since 2009 the prevalence of many of these conditions in adolescents in New Mexico has risen.⁸
- g. That, by way of example, in New Mexico there has been an increase in the number of adolescents with persistent feelings of sadness or hopelessness since 2009.⁹ The number of adolescents experiencing major depressive episodes nationwide and in New Mexico has likewise increased since 2009.¹⁰

⁸ See e.g., 2023 Youth Risk Behavior Survey Results, New Mexico Middle School Survey, 10-year Trend Analysis Report, **NMAG-SM-0253849**; 2023 Youth Risk Behavior Survey Results, New Mexico High School Survey, 10-year Trend Analysis Report, **NMAG-SM-0254003**; 2019 Youth Risk Behavior Survey Results, New Mexico High School Survey, 10-year Trend Analysis Report, **NMAG-SM-0644767**.

⁹ See e.g., State of Mental Health in New Mexico 2022 (Final), **NMAG-SM-0243512**. See also 2023 Youth Risk Behavior Survey Results, New Mexico Middle School Survey, 10-year Trend Analysis Report, **NMAG-SM-0253849**; 2023 Youth Risk Behavior Survey Results, New Mexico High School Survey, 10-year Trend Analysis Report, **NMAG-SM-0254003**; 2019 Youth Risk Behavior Survey Results, New Mexico High School Survey, 10-year Trend Analysis Report, **NMAG-SM-0644767**.

¹⁰ See e.g., Social Media and Youth Mental Health: The U.S. Surgeon General's Advisory, NMAG-SM health: A report of the surgeon general. Department of Health and Human Services,

- h. That in New Mexico in 2023, among high school students:
 - i. 34% used social media more than once an hour;
 - ii. 25% had symptoms of depression;
 - iii. 26% had symptoms of anxiety;
 - iv. 70% had inadequate sleep;
 - v. 13% were electronically bullied;
 - vi. 19% engaged in non-suicidal self-injury;
 - vii. 15% considered a suicide attempt;
 - viii. 8% attempted suicide.¹¹
- i. That in New Mexico in 2023, among middle school students:
 - i. 35% used social media more than once an hour;
 - ii. 31% had symptoms of depression;
 - iii. 32% had symptoms of anxiety;
 - iv. 10% ever vomited or took laxatives (purged) for weight control;
 - v. 51% had inadequate sleep;
 - vi. 27% were electronically bullied;

US Public Health Service; -0231171; Mental 1999; <https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf>; National Survey on Drug Use and Health (NSDUH) at p.32.

<https://www.samhsa.gov/data/sites/default/files/reports/rpt47095/National%20Report/National%20Report/2023-nsduh-annual-national.pdf> (among adolescents aged 12 to 17 in 2023, 18.1% [or 4.5 million people] had a past year major depressive episode [MDE], and 13.5% [or 3.4 million people] had a past year MDE with severe impairment); State of Mental Health in New Mexico 2022 (Final), **NMAG-SM-0243512**; 2023 Youth Risk Behavior Survey Results, New Mexico Middle School Survey, 10-year Trend Analysis Report, **NMAG-SM-0253849**; 2023 Youth Risk Behavior Survey Results, New Mexico High School Survey, 10-year Trend Analysis Report, **NMAG-SM-0254003**; 2019 Youth Risk Behavior Survey Results, New Mexico High School Survey, 10-year Trend Analysis Report, **NMAG-SM-0644767**.

¹¹ New Mexico DOH YRRS datasets for HS 2009-2023, **NMAG-SM-0512792**.

- m. That in 2019 to 2023, suicide was the second leading cause of death among adolescents in New Mexico.¹⁶
- n. That comparing the five-year rate of 2009-2013 to the five-year rate of 2019-2023, suicide deaths among New Mexico youth, ages 17 and younger increased by 31.3%.¹⁷
- o. That 12% of New Mexico's youth are U.S. American Indian or Alaska Native (AI/AN).¹⁸
- p. That in 2023, the U.S. rate of suicide death among AI/AN adolescents was 38% higher than the rate of the general population.¹⁹
- q. That in 2021, 27.3% of U.S. AI/AN high school students seriously considered attempting suicide and 16.0% of U.S. AI/AN high school students attempted suicide.²⁰

¹⁶ See e.g., PED Data Request.docx, **NMAG-SM-0029025**.

¹⁷ See NM IBIS <https://ibis.doh.nm.gov/query/result/mort/MortCnty/CrudeRate5Yr.html>; New Mexico Death Data: Bureau of Vital Records and Health Statistics (BVRHS), Epidemiology and Response Division, New Mexico Department of Health. (<https://www.nmhealth.org/about/erd/bvrhs/vrp/>); New Mexico Population Estimates: University of New Mexico, Geospatial and Population Studies (GPS) Program. <http://gps.unm.edu/>.

¹⁸ Centers for Disease Control and Prevention, National Center for Health Statistics. National Vital Statistics System, Mortality 2018-2023 on CDC WONDER Online Database, released in 2024. Data are from the Multiple Cause of Death Files, 2018-2023, as compiled from data provided by the 57 vital statistics jurisdictions through the Vital Statistics Cooperative Program. Accessed at <http://wonder.cdc.gov/ucd-icd10-expanded.html> on Jun 26, 2025, 12:35:10 AM. This is the "single race estimate" of AI/AN (i.e. if someone is Hispanic and AI/AN, this number includes that child as AI/AN).

¹⁹ Centers for Disease Control and Prevention, National Center for Health Statistics. National Vital Statistics System, Mortality 2018-2023 on CDC WONDER Online Database, released in 2024. Data are from the Multiple Cause of Death Files, 2018-2023, as compiled from data provided by the 57 vital statistics jurisdictions through the Vital Statistics Cooperative Program. Accessed at <http://wonder.cdc.gov/ucd-icd10-expanded.html> on May 29, 2025, 10:16:03 PM.

²⁰ Centers for Disease Control and Prevention, High School YRBS. <https://nccd.cdc.gov/Youthonline/App/Default.aspx>.

- r. That in 2023, 11.7% of New Mexico AI/AN high school students attempted suicide and 12.6% of New Mexico middle school AI/AN high school students attempted suicide.²¹
- s. That in 2023, New Mexico AI/AN middle school students who used social media more than once per hour were 75% more likely to have attempted suicide than AI/AN students who did not use social media that often.^{22, 23}
- t. That in 2023, 27% of New Mexico AI/AN middle school students who were electronically bullied attempted suicide.²⁴
- u. That in 2023, 32% of New Mexico AI/AN high school students who were electronically bullied attempted suicide.²⁵
- v. That in 2023, 14% of New Mexico high school students identify as lesbian gay or bisexual and 6% identify as transgender or non-binary.²⁶
- w. That in 2023, New Mexico high school students who identify as lesbian, gay, or bisexual were more than three times as likely to have attempted suicide as other students and transgender or non-binary students were more than twice as likely to have attempted suicide as cisgender students.²⁷

²¹ New Mexico DOH YRRS datasets for MS 2009-2023, **NMAG-SM-0512791**; New Mexico DOH YRRS datasets for HS 2009-2023, **NMAG-SM-0512792**.

²² New Mexico DOH YRRS datasets for MS 2009-2023, **NMAG-SM-0512791**.

²³ The NM-YBRRS data suggests that New Mexico high school AI/AN students were about 30% more likely to have attempted suicide if they used social media more than once per hour. However, this statistic is not statistically significant, indicating we need a larger sample size to confidently answer the relationship.

²⁴ New Mexico DOH YRRS datasets for MS 2009-2023, **NMAG-SM-0512791**.

²⁵ New Mexico DOH YRRS datasets for HS 2009-2023, **NMAG-SM-0512792**.

²⁶ New Mexico DOH YRRS datasets for HS 2009-2023, **NMAG-SM-0512792**.

²⁷ New Mexico DOH YRRS datasets for HS 2009-2023, **NMAG-SM-0512792**.

- ii. That in the 2023 NM-YRRS the percentage of adolescents reporting mental health harms was higher for those who reported frequent use of social media than for those who reported using social media less.³⁹
- jj. That in 2023, New Mexico high school students who used social media more than once per hour when compared to students who used social media less frequently were:
 - i. 25% more likely to have attempted suicide;
 - ii. 38% more likely to be injured in a suicide attempt;
 - iii. 17% more likely to have symptoms of anxiety;
 - iv. 23% more likely to have persistent feelings of sadness or hopelessness;
 - v. 36% more likely to have symptoms of depression.⁴⁰

and Youth Mental Health: The U.S. Surgeon General's Advisory, **NMAG-SM-0231171**; United States. Public Health Service. Office of the Surgeon General, Center for Mental Health Services (US). Mental health: A report of the surgeon general. Department of Health and Human Services, US Public Health Service (1999); White House Strategy to Address our National Mental Health Crisis. <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2022/03/01/fact-sheet-president-biden-to-announce-strategy-to-address-our-national-mental-health-crisis-as-part-of-unity-agenda-in-his-first-state-of-the-union/>; Haidt, J. (2024). *The Anxious Generation*, Allen Lane.

³⁹ See e.g., New Mexico DOH YRRS datasets for HS 2009-2023, **NMAG-SM-0512792**; New Mexico DOH YRRS datasets for MS 2009-2023, **NMAG-SM-0512791**. See also Social Media and Youth Mental Health: The U.S. Surgeon General's Advisory, **NMAG-SM-0231171**; United States. Public Health Service. Office of the Surgeon General, Center for Mental Health Services (US). Mental health: A report of the surgeon general. Department of Health and Human Services, US Public Health Service (1999); White House Strategy to Address our National Mental Health Crisis. <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2022/03/01/fact-sheet-president-biden-to-announce-strategy-to-address-our-national-mental-health-crisis-as-part-of-unity-agenda-in-his-first-state-of-the-union/>; Haidt, J. (2024). *The Anxious Generation*, Allen Lane.

⁴⁰ New Mexico DOH YRRS datasets for HS 2009-2023, **NMAG-SM-0512792**.

social media interactions with or by others.”⁵⁵ 18.5 % of the cases included a conclusion that “The child was frustrated or angry due to a lack of or limited access to technology including computers, cell phones, social media, or electronic gaming.”⁵⁶

xx. That in 2022, an analysis of New Mexico aggregate child fatality review data found that among 25 children who died of suicide in 2020, 24% of the cases included a conclusion that prior to the suicide death “the child was frustrated or angry due to lack of or limited access to technology including computers, cell phones, social media, or electronic gaming”; and that 16% of these suicide deaths included a conclusion that “the child was frustrated, discouraged, hurt, angry, or jealous because of social media interactions with or by others.”⁵⁷

yy. That in the New Mexico Child Fatality Review 2022 Report, mental health concerns often precipitated the suicide death of a New Mexico child.⁵⁸ Among 44 children who died by suicide:

- i. Twenty (46%) experienced a major life stressor within 30 days prior to death;
- ii. Twenty (46%) experienced a sense of isolation;
- iii. Thirteen (30%) had a recent argument with their parents;

⁵⁵ Email Thread-Subject: AWSM proposal, From: Courtney Fitzgerald, To: Dylan Pell, Sep. 29, 2022, **NMAG-SM-0239708**.

⁵⁶ Email Thread-Subject: AWSM proposal, From: Courtney Fitzgerald, To: Dylan Pell, Sep. 29, 2022, **NMAG-SM-0239708**.

⁵⁷ Email Thread-Subject: Some Mental Health Epi Updates Related to Suicide Prevention, From: Dylan Pell, To: Liza Suzanne, et al., Sept. 30, 2022, **NMAG-SM-0239538**.

⁵⁸ New Mexico Child Fatality Review 2022 Report, Findings & Recommendations from Child Deaths Reviewed from 2020-2021, **NMAG-SM-0442026**.