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EXHIBIT K

In the Matter Of:

State of New Mexico vs Meta Platforms

D-101-cv-2023-02838

ANTHONY JOHN EASTIN

September 15, 2025



ESQUIRE
DEPOSITION SOLUTIONS

800.211.DEPO (3376)
EsquireSolutions.com

1 investigation like this is to make the targets think
2 that you are a real 14-year-old girl and not an
3 investigator. Right?

4 MR. ACKERMAN: Object to form.

5 A. That's not my goal is to be -- is for 04:39
6 them to think so much that I am a 14-year-old girl,
7 that's so much for them to believe that I am a 14 --
8 a -- it is for me to demonstrate the ease of access
9 for CSAM material on each platform as well as the
10 ease for children the ability to be contacted on 04:40
11 social media platforms by potential predators for
12 sexual acts. That's as well as the inability for
13 social media platforms to detect potential CSAM
14 material as well as an inability for social media
15 platforms to --

16 MR. ACKERMAN: Don't -- don't -- you
17 got to -- you got to slow down for the court
18 reporter.

19 A. Sorry. What is written on Page 1 as to
20 the purpose. That was my purpose. 04:40

21 Q. Just so I understand, one of your
22 goals --

23 A. Purpose.

24 Q. I understand that. One of your goals was
25 not to make the targets believe that you are a real 04:40

1 14-year-old girl versus an investigator?

2 MR. ACKERMAN: Object to form.

3 A. My purpose was to demonstrate ease of
4 access to CSAM material on each platform and so on,
5 and whatever it says here.

04:41

6 Q. I understand what your report says under
7 the word purpose. I'm asking you a different
8 question.

9 A. Okay.

10 Q. Was one of your goals to make targets
11 believe that you were a real 14-year-old girl or
12 not?

04:41

13 MR. ACKERMAN: Object to form.

14 A. It wasn't my goal.

15 Q. Okay.

04:41

16 MR. ACKERMAN: If it's a good time
17 for a break, we could probably use one.

18 THE VIDEOGRAPHER: It is 4:41 p.m.
19 We're off the record.

20 (Break.)

04:41

21 THE VIDEOGRAPHER: It is 4:54 p.m.
22 We're back on the record.

23 Q. This is a "yes" or "no" question,
24 Mr. Eastin. Did Motley Rice instruct you to
25 purchase aged accounts for Phase 1 of Project

04:54