

Filed Under Seal

EXHIBIT L

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT

No. D-101-CV-2023-02838

STATE OF NEW MEXICO, EX REL.,
RAÚL TORREZ, ATTORNEY GENERAL,
Plaintiff,

v.

META PLATFORMS, INC.;
INSTAGRAM, LLC; META PAYMENTS,
INC.; and META PLATFORMS
TECHNOLOGIES, LLC,

Defendants.

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF RICKEY KITCH

Held At:

New Mexico Department of Justice
201 3rd Street NW, Suite 300
Albuquerque, New Mexico 87102

September 18th, 2025

9:08 a.m.

Reported by:

Maureen O'Connor Pollard, RDR
New Mexico CSR 571

1 MR. ACKERMAN: Object to form.

2 THE WITNESS: The goal of what
3 investigation?

4 BY MS. POPE:

5 Q. You said "that was not the goal I
6 was working on in that investigation," right?

7 A. Yes.

8 Q. So what was the goal you were
9 working on?

10 MR. ACKERMAN: Object to form.

11 THE WITNESS: To better understand
12 the Meta platform and how and why my
13 accounts were receiving the types of
14 referrals, ads, and content it was
15 receiving.

16 BY MS. POPE:

17 Q. Okay. Were you asked at any point
18 to keep a record of any CSAM you encountered on
19 Facebook?

20 MR. ACKERMAN: Object to form.

21 THE WITNESS: Not that I can
22 remember. I'm not saying it may have
23 happened or it may not have happened, but
24 I cannot remember an incident where it
25 did.

1 construct or thought with forming that
2 account was to initially try to locate
3 Mr. Dante.

4 BY MS. POPE:

5 Q. And that's true for the other
6 accounts you created after Issa Bee, right? You
7 also weren't trying to create a typical
8 teenager?

9 MR. ACKERMAN: Object to form.

10 THE WITNESS: Again, I'm not sure of
11 the "typical teenager" characterization.
12 What's typical to you may not be typical
13 to me as far as teenagers go. We may have
14 differing ideas on typical teenager that
15 may be using a social media platform.

16 BY MS. POPE:

17 Q. Were you trying to make your
18 personas reflect your idea of a typical
19 teenager?

20 MR. ACKERMAN: Object to form.

21 THE WITNESS: I believe that's the
22 only filter I had available to me, was my
23 own personal perspective.

24 BY MS. POPE:

25 Q. Which of your personas do you think

1 page?

2 MS. POPE: On the first page.

3 MR. ACKERMAN: Okay.

4 BY MS. POPE:

5 Q. There's a heading that says "Intro,"
6 and underneath that it says "manic pixie.
7 Ativan, Lorazepam thank u Ma'am."

8 Do you see that?

9 A. Yes.

10 Q. Were you trying to suggest that Issa
11 Bee abused prescription drugs?

12 MR. ACKERMAN: Object to form.

13 THE WITNESS: No.

14 BY MS. POPE:

15 Q. Do you think a typical teenager
16 would post about lorazepam on Facebook?

17 MR. ACKERMAN: Object to form.

18 THE WITNESS: Yes. Many of them
19 that this account was in contact with were
20 indicating many of the same medications
21 that they were using.

22 BY MS. POPE:

23 Q. What were you trying to suggest by
24 having Issa Bee mention lorazepam?

25 MR. ACKERMAN: Object to form.

1 MR. ACKERMAN: Object to form.

2 THE WITNESS: I'm not sure. Not --
3 the whole idea behind the account was to
4 let it be free flowing and let as many
5 people add to the account as followers as
6 wanted to.

7 I would say it would be very few,
8 maybe in the range of 20 to 30 friend
9 requests.

10 BY MS. POPE:

11 Q. But you didn't keep track of the
12 friend requests you made, right?

13 A. No, I did not.

14 Q. The vast majority of these 4,981
15 friends were adult men, right?

16 A. I believe that to be true.

17 Q. Do you think a typical teenage girl
18 would have 4,981 friends on Facebook?

19 MR. ACKERMAN: Object to form.

20 THE WITNESS: No, I don't.

21 BY MS. POPE:

22 Q. Do you think a typical teenage girl
23 would have most of her friends be adult male?

24 MR. ACKERMAN: Object to form.

25 THE WITNESS: Again, I can't

1 delineate between typical teen and her
2 account. I was making her account appear
3 as typical based on my interpretation of
4 other accounts that were coexisting with
5 my account.

6 BY MS. POPE:

7 Q. But you didn't research whether
8 typical teenage girls tend to have mostly adult
9 male friends, right?

10 MR. ACKERMAN: Object to form.

11 THE WITNESS: No, I did not research
12 that.

13 BY MS. POPE:

14 Q. Okay. I'd like to flip to page 9 of
15 the document which ends in the Bates number --
16 it's very small here at the bottom, but it ends
17 in 129. And there's a post here that's dated
18 November 6th.

19 Do you see that?

20 A. Yes, I do.

21 Q. And the largest picture is a young
22 woman wearing a white top.

23 Do you see that?

24 A. Yes.

25 Q. Where did you get this picture?