

**Filed Under Seal**

**EXHIBIT N**

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STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT  
No. D-101-CV-2023-02838

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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

CONTINUED VIDEOTAPED DEPOSITION OF  
RICKEY KITCH

Held At:

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

September 19th, 2025  
8:37 a.m.

Reported by:

Maureen O'Connor Pollard, RDR

1           today's date. Things may change over  
2           time. I'd like to reserve the opportunity  
3           to change my opinions as well.

4       BY MS. POPE:

5           Q.       Do you have any other opinions  
6           sitting here today that you intend to offer at  
7           trial?

8                   MR. ACKERMAN: Object to form.

9                   THE WITNESS: No, I do not that I'm  
10          aware of.

11       BY MS. POPE:

12           Q.       You understand that New Mexico is  
13           offering you as an expert in this matter, right?

14           A.       I do.

15           Q.       What are you an expert in?

16           A.       Not a whole lot of things, but I  
17           think with regards to the chats that I do have a  
18           bit of experience that a lot of people most  
19           likely do not have. My online interactions on  
20           the platform as well.

21           Q.       So how would you describe your area  
22           of expertise?

23                   MR. ACKERMAN: Object to form.

24                   THE WITNESS: My area of expertise  
25          would be directly related to online chats

1           within social media platforms and  
2           understanding, or trying to understand  
3           algorithms and search algorithms, things  
4           like that.

5       BY MS. POPE:

6           Q.       So is it your testimony that you are  
7           an expert in online chatting on social media  
8           platforms?

9                   MR. ACKERMAN:   Object to form.

10                  THE WITNESS:   Yes.

11       BY MS. POPE:

12           Q.       And is it that -- is it your  
13           testimony that you are an expert on search  
14           algorithms on social media platforms?

15                   MR. ACKERMAN:   Object to form.

16                  THE WITNESS:   I wouldn't say  
17           scientifically, in that I'm not a  
18           programmer or anything like that,  
19           understanding how the internal mechanisms  
20           worked, but from a layperson's outside  
21           perspective of using the platform, yes.

22       BY MS. POPE:

23           Q.       What expertise do you have in search  
24           algorithms?

25                   MR. ACKERMAN:   Object to form.

1                   Go ahead.

2                   THE WITNESS: That expertise would  
3                   be guided by the experiences that I  
4                   referred to throughout the course of my  
5                   investigation.

6       BY MS. POPE:

7               Q.       When you say "search algorithms,"  
8               what are we talking about?

9               A.       Briefly yesterday we spoke about the  
10              search engine optimization factor within Meta.  
11              That was something that was very interesting to  
12              me, as initially I was trying to grasp why the  
13              accounts were behaving so differently apart from  
14              each other, why one account would be offered up  
15              certain amounts of different types of ads or  
16              different amounts of Reels, different types of  
17              Reels, different friend requests from different  
18              locations throughout the world.

19              So it was basically attempting to  
20              understand how and why, if there were any  
21              commonality, commonalities between those  
22              personas that I was operating and why I was  
23              receiving such varied results.

24              Q.       Have you ever designed an algorithm?

25              A.       I have not.

1 BY MS. POPE:

2 Q. Have you done any calculation of how  
3 many children you claim are exploited because of  
4 social media generally?

5 MR. ACKERMAN: Object to form.

6 THE WITNESS: No, I have not.

7 BY MS. POPE:

8 Q. Did you make any effort to compare  
9 Meta's efforts to prevent the sexual  
10 exploitation of children to any other app?

11 MR. ACKERMAN: Object to form.

12 THE WITNESS: Not formally, no.

13 BY MS. POPE:

14 Q. Did you do any analysis of how  
15 frequently child sexual exploitation happens on  
16 TikTok?

17 A. No, I did not.

18 Q. Did you do any analysis of how  
19 frequently child sexual exploitation happens on  
20 any other specific app?

21 MR. ACKERMAN: Object to form.

22 THE WITNESS: No, I did not.

23 BY MS. POPE:

24 Q. Okay. Let's look at page 21. And  
25 here you refer to search terms that predators

1 may use.

2 Do you see that?

3 A. Where is it on the page?

4 Q. The last paragraph, it says,  
5 "Predators can use search terms - a list of  
6 which is attached as Exhibit C."

7 Do you see that?

8 A. Yes.

9 Q. Is it your opinion that buyers and  
10 sellers of CSAM use the terms in Exhibit C to  
11 find each other?

12 A. It is, yes.

13 Q. You're not saying that a predator  
14 could use the terms that you have in Exhibit C  
15 to find a typical teenager online, right?

16 MR. ACKERMAN: Object to form.

17 THE WITNESS: I wouldn't ascribe it  
18 to -- or I can't define what a typical  
19 teenager is in your definition.

20 BY MS. POPE:

21 Q. In your own words, what are the  
22 terms, the search terms in Exhibit C used for?

23 A. A search for CSAM materials or  
24 groups proliferating sale of CSAM or interest in  
25 CSAM, or interest in potential grooming of a

1 child victim.

2 Q. Okay. Let's flip to Exhibit C of  
3 your report. This is the list. Who put  
4 together this list of terms?

5 A. I believe this list of terms was  
6 compiled by a professor at Trine University in  
7 Angola, Indiana.

8 Q. That's Professor Timothy Carver,  
9 right?

10 A. I believe so, yes.

11 Q. Have you ever spoken to Mr. Carver?

12 A. I have not.

13 Q. Do you know how he put this list  
14 together?

15 A. I am not aware of how he put the  
16 list together. My understanding on the forum  
17 that I received this list was that he had  
18 conducted a study himself in association with  
19 the university.

20 Q. How did you find this list?

21 A. The list was made available to me on  
22 the ICAC LISTSERV.

23 Q. When did you receive it from the  
24 ICAC LISTSERV?

25 A. I can't recall off the top of my