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EXHIBIT O

**HIGHLY CONFIDENTIAL
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**EXPERT REPORT OF
Rickey Kitch**

*State of New Mexico, Ex Rel., Raúl Torrez, Attorney General v. Meta Platforms, Inc.;
Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC*

First Judicial District Court, Santa Fe County

No. D-101-CV-2023-02838

July 11, 2025

Meta also has identified red flags of sexual exploitation that are consistent with those described above. [REDACTED]

Opinion Five: Based on my training and experience, Meta and other social media platforms have expanded child sexual exploitation by introducing predators to a wide universe of children to whom they previously did not have access.

While predators have always had access to children, Meta’s platforms have enabled predators to identify, groom, and exploit children at an unprecedented scale. New Mexico receives hundreds to thousands of cybertips related to child exploitation every year.⁸³ Based on my experience when I started in law enforcement and my interactions with other law enforcement personnel, it used to be the case that a predator had to find a child in the real world and befriend or abduct that child. Now, Meta delivers a universe of kids—a virtual marketplace of minors—directly to predators’ living rooms on their phones and computers. As noted above, Meta, in particular, designs its platforms to present profiles and photographic histories of children, allowing predators not only to find them, but providing details that allow the predator to groom them.

Predators can use search terms—a list of which is attached as Exhibit C, which allow them to identify a virtual menu of potential victims. For example, CSAM sellers and buyers have used cheese pizza, which shares an acronym with child pornography, or its shortened form of pizza links, to indicate interest in or availability of child pornography since at least 2016. In my experience, searching for accounts or characteristics of children on Meta will prompt the recommendation of other similar accounts, multiplying the opportunities for a predator to find additional victims. Bad actors that interacted with my undercover accounts reported that my account was recommended, connected through groups my personals were invited to unsolicited or where my profile IDs and photos were added, or that they are a friend of a friend. In addition, bad actors can signal to each other to seek out particular children by sharing and searching for specific

⁷⁹ METANMAG-005-01333676; *See also*, METANMAG-010-00126613.

⁸⁰ METANMAG-005-01333676.

⁸¹ METANMAG-005-01333676.

⁸² METANMAG-005-01333676.

⁸³ *See e.g.*, NMAG-SM-0187369; NMAG-SM-0187370; NMAG-SM-0187371; NMAG-SM-0187372; NMAG-SM-0187373; NMAG-SM-0187374; NMAG-SM-0199119; and NMAG-SM-0187798.

profile ids.⁸⁴ Predators can create a catalog of profile ids, following instructions from an online search of “how to find profile id on Facebook.”

Predators can also set up groups or find children in groups. In some cases, bad actors join groups to scout for children by logging id numbers of group accounts set up for innocent purposes (such as a parent setting up a group for child’s dance recital). Also, it is not uncommon for predators to create their own aggregate pages, where they collect and post photos or account ids of children that match predators’ interests (e.g., gymnasts, swimming, or dance). These aggregator groups may even use bots. The aggregate collection of PFPs, which aggregate a user’s profile pictures or historical content posts, can be sold on platforms and re-edited for content to include CSAM. The PFP may form the basis of or precursor to a lorebook, which documents a victim’s extortion, self-harm, camming (sexual content provided online), or other material meant to extort or dox a victim. PFPs can be sold or traded online on various platforms, including Facebook and Instagram, and lorebooks may be posted on the same platforms (and others).

In addition, predators can friend, comment, or message scores of children on social media, playing the odds that some of those children will respond. In undercover operations that I have conducted, adult predators have commented on children’s posts, telling them they look beautiful, or expressing their love, admiration, or desire in words or emoji. These predators invite children to contact them through direct messages, ask them to send pictures, call, or meet them.⁸⁵

In all of these ways, social media generally and Meta specifically, through its design, search functions, and recommendation systems, have dramatically increased the number of children who are subjected to and ultimately exploited.

V. Conclusion

I hold all of the opinions expressed in the report to a reasonable degree of professional certainty based on the information available to me. I reserve the right to update or revise my opinions and the materials I considered to reflect new documents or other information that become available after the date of this report.

VI. Attachments

- a. CV
- b. Materials Considered
- c. CP Search Terms

⁸⁴ Once a Facebook account is created, it is assigned a profile id. The profile name and details can change, but the profile id does not change.

⁸⁵ NMAG-PLTF-META-0000096.