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EXHIBIT Q



Krystal Adams

Date: November 4, 2025

Case: State of New Mexico v. Meta Platforms, Inc.

Case #: D-101-CV-2023-02838

Maricopa Reporting, Inc.
[https://www.maricopareporting.com/
scheduling@maricopareporting.com](https://www.maricopareporting.com/scheduling@maricopareporting.com)
(480) 597-4744

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO, EX REL.,
RAUL TORREZ, ATTORNEY GENERAL,

Plaintiff,

vs.

NO.

D-101-CV-2023-02838

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

Defendants.

VIDEOTAPED DEPOSITION OF
KRYSTAL ADAMS

November 4, 2025

201 3RD STREET NORTHWEST, SUITE 300
ALBUQUERQUE, NEW MEXICO 87102

9:32 A.M.

REPORTED BY:
PAUL BACA, CCR
NM CERTIFICATE 112

MOTLEY RICE LLC
401 9th Street, NW, Suite 630
Washington, DC 20004
202-849-4962

- and -

NEW MEXICO DEPARTMENT OF JUSTICE
408 Galisteo Street
Santa Fe, New Mexico 87501-2689
505-601-7727

- and -

NEW MEXICO DEPARTMENT OF JUSTICE
201 Third Street, NW, Suite 300
Albuquerque, New Mexico 87102
505-946-7292

For the Defendants:

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, PLLC
1615 M Street NW, Suite 400
Washington, DC 20036
202-326-7938

BY: DANIEL V. DORRIS
ddorris@kelloggghansen.com

DANIEL SEVERSON
dseverson@kelloggghansen.com

James Cogswell, Videographer

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1 all; is that correct?

2 MR. PERFREMENT: Object to the form.

3 A. That's correct.

4 Q (By Mr. Dorris) The State counts as a
5 misrepresentation -- I'm sorry, the State counts as
6 a violation every misrepresentation for every
7 New Mexico users of Meta's apps regardless of
8 whether that person ever relied on this
9 representation; is that correct?

10 MR. PERFREMENT: Object to the form?

11 A. That's correct.

12 Q (By Mr. Dorris) And does the State have
13 any evidence whatsoever that any New Mexico consumer
14 relied on any of the misrepresentations alleged at
15 all?

16 MR. PERFREMENT: Object to the form and
17 beyond the scope.

18 A. Yeah, I would think that would be expert
19 testimony.

20 Q (By Mr. Dorris) As the State's designee
21 sitting here today, does the State, to your
22 knowledge, have any evidence that any New Mexico
23 consumer relied on any of the statements in any way?

24 MR. PERFREMENT: Object to the form and
25 beyond the scope.

1 A. Yeah, I wouldn't be able to answer that.
2 The question's a little bit confusing.

3 Q. Okay.

4 A. So if you would like to reword it, that
5 would probably be beneficial.

6 Q (By Mr. Dorris) Sure. Let's actually go
7 to topic No. 1.

8 A. Sure.

9 Q. And actually before we get there, you
10 know, you in several of your responses said there's
11 no way to know whether anyone saw a statement. Is
12 there any evidence the State has either way whether
13 people did or did not see the statements at issue?

14 A. I mean, we have multiple sets of consumer
15 complaints that have come through our office where
16 they've been adversely effected by Facebook and
17 Instagram, so I know that's obviously what brings us
18 here today, is we do have consumers of New Mexico
19 that have been adversely effected and harmed by
20 Facebook.

21 Q. We will get to those consumer complaints,
22 trust me. But with respect to the consumer
23 complaints, is there any evidence in any of those
24 complaints whether they ever saw, one way or
25 another, any of Meta's statements?

1 MR. PERFREMENT: Object to the form.

2 A. Whether they knowingly went in to being
3 harmed or unknowingly went into being harmed, I
4 think that's irrelevant.

5 Q (By Mr. Dorris) I'm asking you if there's
6 any evidence in the consumer complaints that you
7 referenced, whether there is any evidence, one way
8 or another, whether those users ever saw any of the
9 alleged misrepresentations?

10 MR. PERFREMENT: Object to the form,
11 beyond the scope.

12 A. I mean, I can't think of the consumer
13 complaints that I overlooked that that was
14 mentioned, but that's not to say that they don't
15 exist.

16 Q (By Mr. Dorris) So sitting here today as
17 the State's designee, you're not aware of any
18 evidence that any New Mexico consumer did or did not
19 see any of the alleged misrepresentations; is that
20 correct?

21 MR. PERFREMENT: Object to the form.

22 A. Yeah, I wouldn't be able to highlight that
23 specifically right now.

24 Q (By Mr. Dorris) And not just highlight.
25 You can't -- as the State's designee, you can't give

1 me any piece of evidence, one way or another,
2 whether any New Mexico consumer ever saw any of
3 these statements; is that correct?

4 MR. PERFREMENT: Object to the form,
5 beyond the scope.

6 A. I just don't feel like I'm the expert
7 witness who took in any of these complaints and kind
8 of the deep dive that went into asking how they
9 ended up with this type of harm and what they --
10 what their Facebook experience was. Obviously, they
11 focused on the egregious acts that took place based
12 within the platform and not necessarily the
13 education that went in behind that.

14 Q (By Mr. Dorris) Okay. I'm not asking you
15 whether you're the expert or not. I'm just asking
16 you what you know as the State's designee.

17 MR. PERFREMENT: Counsel --

18 Q. (By Mr. Dorris) Do you have any evidence,
19 one way or another, whether any New Mexico consumer
20 ever saw any of the alleged misrepresentations?

21 MR. PERFREMENT: Hold on, Krystal.

22 Counsel, you've asked this question
23 numerous times. Her answer hasn't changed. You
24 also keep referring to her as the State's designee
25 on this topic. This is basically a reliance on a

1 topic on which we previously advised in writing that
2 we would not be providing a representative because
3 it is not an element of the UPA claim.

4 MR. DORRIS: I'm not asking about -- I'm
5 asking about how you count violations. It's totally
6 within the topic.

7 MR. PERFREMENT: You're talking about
8 reliance.

9 Q (By Mr. Dorris) Go ahead. I'm asking you
10 as the State's expert on topic No. 3, are you aware
11 of any evidence, one way or another, whether any
12 New Mexico consumer ever saw any of the alleged
13 misrepresentations?

14 MR. PERFREMENT: And I object because that
15 is not within the scope of topic No. 3. It's within
16 the scope of topic No. 11, which is a topic you've
17 been previously advised we will not be producing a
18 witness.

19 Q. (By Mr. Dorris) You can answer.

20 A. I mean, I've already answered the
21 question, I think, ten times over at this point.

22 Q. All right. I want the answer right now to
23 my question. I'm asking you, as the State's expert
24 on topic No. 3, are you aware of any evidence that
25 you can point me to one way or another whether any

1 New Mexico consumer ever saw any of the alleged
2 misrepresentations?

3 MR. PERFREMENT: Object to the form,
4 beyond the scope.

5 A. I personally have not seen the violation,
6 the -- what you're speaking to at this point, no.

7 Q (By Mr. Dorris) You've not seen any
8 evidence one way or another, correct?

9 A. No. And, again, I'm a 30(b)(6) witness.
10 I'm not an expert in this case.

11 Q. All right. I'd like to understand how the
12 State counts violations for some of these
13 misrepresentations. Maybe it's the same, but I want
14 to ask about some specific misrepresentations just
15 to make sure I fully understand.

16 Can you please turn to the interrogatory
17 responses in State's Exhibit No. 17 at page 10.

18 All right. And these, on page 10, are
19 some of the misrepresentations that the State
20 alleges Meta made, correct?

21 A. And just to verify, is this 1, Exhibit 1,
22 or is this --

23 Q. I believe this is State's Exhibit No. 17.

24 A. Okay. And this is page 10?

25 Q. Yes.