

**“In short, Meta’s business strategy that purposefully addicts Young Users to its Social Media Platforms has caused widespread and significant injury to Mississippians.” (page 6 of the Mississippi complaint)**

Social Media Platforms are not like other consumer products that have appealed to young people, like candy or soda. There is no natural break point. Consumption of the Social Media Platform is endless.

Meta has designed its Social Media Platforms to exploit that dynamic with an array of design features, like push notifications, automatically-played videos, infinite scrolling, and time-limited content, that make it irresistible to log on and psychologically difficult to log off.

U.S. Surgeon General Vivek Murthy describes this as an unfair fight. “[W]e tell a child, use the force of your willpower to control how much time you’re spending, you’re pitting a child against the world’s greatest product designers.”

As Meta’s founding president Sean Parker explained:

“It’s a social-validation feedback loop ... exactly the kind of thing that a hacker like myself would come up with, because you’re exploiting a vulnerability in human psychology. The inventors, creators – me, Mark [Zuckerberg], Kevin Systrom on Instagram, all of these people – understood this consciously. And we did it anyway.”

**While Meta profited, children suffered.**

In 2022, Meta reported earning \$116.6 billion with \$23.2 billion in net income.

While the full impact of Meta’s experiment may not be realized for decades, early returns are alarming. Research points to a wide range of harms, including increased levels of depression, anxiety, and attention deficit disorders; altered psychological and neurological development; and reduced sleep.

A May 2023 Advisory issued by the U.S. Surgeon General identifies “changes in brain structure” and “altered neurological development” amongst the harms to young people, as well as “depressive symptoms, suicidal thoughts and behaviors,” “attention deficit/hyperactivity disorder (ADHD),” and “depression, anxiety and neuroticism.”

There is also an immense opportunity cost for young people who are not engaged in experiences in the real world because they are glued to their social media, which is leading to diminished social capacity and other developmental skills.

By Meta’s own internal measure, only 2% of content that young people encounter on its platforms is “age appropriate nutritious” or “the sort of content we would like to promote to teens.”

One Meta data scientist commented on a 2021 analysis of teen use, “Honesty the only insight I see in these charts is that teens are really into using IG at 11 pm when they should probably be sleeping 😞”

According to its own survey of users in September and October 2018, “33% of people hav[e] been feeling worse about themselves on [Instagram] for ‘several months to a year.’” And that same survey found that teen girls are eight times more likely to engage in negative social comparison due to Instagram use.

Its own research concluded that 68% of teen girls experience negative social comparison, and this issue is “not an influencer problem, it’s an Instagram problem.”

In November 2019, Meta internally published the results of a 22,000-person survey that found “at least 1 in 2 [Instagram] users had experienced at least one mental health related issue in the last 30 days.”

A 2021 survey known within Meta as BEEF (Bad Experiences and Encounters Framework), found that a significant number of Instagram users regularly experience negative social comparison-promoting content; self-harm-promoting content; bullying content; unwanted advances; and a collection of other harmful encounters on the platform. BEEF results were ultimately restricted to a secret group of only 66.

### **Meta knew what it was doing ...**

In December 2015, CEO Zuckerberg listed as one of Meta’s goals for 2016: “Time spent [on the Platforms] increase[] by 12%” over the following three years. And as of November 2016, Meta’s “overall goal remain[ed] total teen time spent ... with some specific efforts (Instagram) taking on tighter focused goals like U.S. teen total time spent.”

Between October 2022 and April 2023, Meta’s own internal metrics show that an average of 208,000 Mississippi young adults used Instagram daily and 345,000 used it monthly. In fact, Meta monitored key metrics for Mississippi, including:

- Ratio of teen daily active users to monthly active users: 0.72
- Increase in monthly active users over a two-month period: 7,894
- By 2020, Meta estimated 100% of MS teens were monthly active users of Instagram

A 97-page internal presentation, “Teen Fundamentals,” in May 2020, described its goal as to “look ... to biological factors that are relatively consistent across adolescent development and gain valuable unchanging insights to inform product strategy...”

That presentation conceded, “due to the immature brain they have a much harder time stopping even though they want to – our own product foundation research has shown teens are unhappy with the amount of time they spend on our app.”

One internal communication noted that Meta could “[l]everage teens’ higher tolerance for notifications to push retention and engagement,” while another noted that some users are “overloaded because they are inherently more susceptible to notification dependency.”

As it noted in its 2019 internal presentation, “Teen Mental Health Deep Dive,” “Young people are acutely aware that Instagram can be bad for their mental health, yet are compelled to spend time on the app for fear of missing out on cultural and social trends.”

In another internal presentation, Meta employees express concerns about “content on IG triggering negative emotions among tweens and impacting their mental well-being (and) our ranking algorithms taking into negative spirals & feedback loops that are hard to exit from.”

In an internal exchange about Netflix's "The Social Dilemma," Instagram's Director of Data Sciences noted, "without the right stimulus, someone might never become an addict. ... It's like, you'll never become a gambling addict if you don't visit vegas. :P"

A "pre-read" 2018 internal document acknowledged that Meta "[does] very little to keep [under 13-year-olds] off our platform," and Facebook's registration process doesn't prevent their creating accounts.

Meta touts its Community Standards Enforcement Reports to create a façade that its platforms are safe by reporting, for example, that only 0.05-0.06% of views were of content that violated the Standards (2021 Third Quarter Report), but Meta's internal data revealed that during the same time:

- 48.7% of 13-15 year old users and 50% of 16-17 year olds witnessed bullying
- 24.4% of 13-15 year old users and 25.4% of 16-17 year olds received unwanted advances
- 16.9% of users aged 13-15 years of age saw content relating to self-harm

Testimony from Meta's former Director of Integrity, Arturo Bejar, obtained by the State in its investigation includes this response to the question of whether he was aware of any instances where Meta in his view downplayed the harms users were experiencing on its platforms:

"Every time that a Company spokesperson in the context of harms quotes prevalence statistics I believe that is what they are doing, that they're minimizing the harms that people are experiencing in the product."

### **... and failed to make changes because it interfered with its business strategy.**

Meta's leadership, including its founder and CEO Mark Zuckerberg, repeatedly declined employees' requests to fund measures that would reduce Instagram's known harms and then limited internal access to any incriminating findings to keep the public from discovering the truth.

For example, Zuckerberg personally intervened to lift a ban on selfie filters that mimicked plastic surgery effects despite the fact that Meta's own retained experts overwhelmingly found they were devastating for young women, and Meta never disclosed the harmfulness of this platform feature.

Another example: When Meta discovered that its "Time Spent" tools delivered inaccurate data to consumers, it refused to sunset these tools and continued to mislead consumers rather than take a public relations "hit" for rolling back a purported wellness feature.

In 2021, in response to recommendations made by Nick Clegg, Meta's President of Global Affairs, to address young people's mental health and wellbeing, Adam Mosseri, head of Instagram, noted, "we've been talking about for a long time but have made little progress." Meta's VP of Product agreed, "We got 0 new well-being funding for 2022."

Recognizing that Meta's public declarations did not match their actual policies and priorities, Clegg highlighted to CEO Zuckerberg that it "is important to ensure we have the product roadmaps necessary to stand behind our external narrative of well-being on our apps."

An internal email from September 2018 indicates that, according to Meta, "The lifetime value of a 13 [year old] teen is roughly \$270 per teen."