FLOYD COUNTY SCHOOLS
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SUPERINTENDENT
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Consent Agenda Item (Action Item): Consider/Retroactive Approve authorizing litigation against social media companies. The litigation involves claims against Meta, TikTok, Snap, Google/YouTube, and related companies concerning the alleged impact of their platforms on young people and the resulting costs incurred by school districts for counseling, behavioral interventions, staffing, and other student-support services.

Applicable State or Regulations: Board Policy 01.11 General Powers and Duties of the Board.

Fiscal/Budgetary Impact: There will be no fiscal or budgetary impact on the Floyd County Board of Education.

History/Background: More than 90% of youth today use social media, primarily YouTube, TikTok, Snapchat, Instagram, and Facebook. Excessive and problematic use of social media is harmful to the mental, behavioral, and emotional health of youth and is associated with increased rates of depression, anxiety, low self-esteem, eating disorders, and suicide. The litigation involves claims against Meta, TikTok, Snap, Google/YouTube, and related companies concerning the alleged impact of their platforms on young people and the resulting costs incurred by school districts for counseling, behavioral interventions, staffing, and other student-support services.

Recommended Action: Retroactive approve authorizing litigation against social media companies.

Contact Person(s): Ted George Assistant Superintendent 606-886-2354

	Jack Young	Tonya H. Williams
Principal	**Director**	**Superintendent**

Date: 10/19/26

The Floyd County Board of Education does not discriminate on the basis of race, color, national origin, age, religion, marital status, sex, or disability in employment, educational programs, or activities as set forth in Title IX & VI, and in Section 504.

Floyd County Schools Board of Education
442 KY Route 550
Eastern, KY 41622

RESOLUTION
Authorizing Litigation Against Social Media Companies

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Whereas, more than 90% of youth today use social media, primarily YouTube, TikTok, Snapchat, Instagram, and Facebook;

Whereas, excessive and problematic use of social media is harmful to the mental, behavioral, and emotional health of youth and is associated with increased rates of depression, anxiety, low self-esteem, eating disorders, and suicide;

Whereas, social media companies have designed their platforms to maximize the time youth spend using them and addict youth to their platforms;

Whereas, many children are burdened by mental health challenges, and young people everywhere face unprecedented, learning and life struggles that are amplified by the negative impacts of increased screen time, unfiltered content, and potentially addictive properties of social media;

Whereas, social media companies have made choices to target youth, to maximize the time youth spend on social media platforms and then designed their algorithms to feed children harmful content, like videos promoting eating disorders, violence, self-harm, and suicide.

Whereas, social media companies' actions related to their social media platforms are substantially contributing to the mental health crisis America's youth are facing. The harms allegedly caused by these companies include, but are not limited to, intentionally designing, marketing, and operating their exploitive social media platforms to be extremely popular with youth users, despite research confirming the severe and wide-ranging effects of social media on youth mental health;

Whereas, research has shown that excessive and problematic use of social media is harmful to the mental, behavioral, and emotional health of youth and is associated with increased rates of depression, anxiety, low self-esteem, eating disorders, and suicide;

Whereas, Social media's business models are based upon maximizing the time users spend on their platforms. Defendants have designed their platforms so that users constantly feel the need to be on it:

Whereas, School Districts' first and greatest priority is the health and well-being of the students, and this includes the social and emotional harm that they suffer because of the negative impacts of social media;

Whereas, Public Schools have been significantly impacted by the resulting crisis from overexposure to social media because school districts are one of the main providers of mental health services for school- aged children in the community;

Whereas, this School District and its employees spend a significant amount of time and resources addressing students' mental health issues;

Whereas, this School District and its employees spend a significant amount of time and resources providing counseling and educational services to students related to the harms caused by social media;

Whereas, this School District believes it is entitled to compensation for its efforts and resources expended to address and treat the mental health issues caused by social media;

Whereas, this School District desires to reduce the negative impact of social media on the mental health of students;

Whereas, the Floyd County Schools Board of Education has determined that it has the responsibility to protect its students and take legal action against these social media companies;

IT IS HEREBY RESOLVED that the Floyd County Schools authorizes attorney Ronald Johnson, and his law firm, Hendy Johnson Vaughn of Louisville, Kentucky, to file a civil action against any appropriate parties to compensate Floyd County Schools District for damages suffered by Floyd County Schools, and its students, as a result of social media's targeting students, to maximize the time youth spend on Defendants' social media platforms, and designing their algorithms to expose children to harmful content, like videos promoting eating disorders, violence, self-harm, and suicide, and to seek any other appropriate relief; including injunctive relief. The Floyd County Schools District further authorizes the superintendent to sign all necessary contracts and other related documents on behalf of in the pursuit of any civil action upon advice and guidance from the Board Attorney.

This the ____ day of October 2026.

_____
Board Member

_____
Board Member

_____
Board Member

_____
Board Member

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION	Case No. 4:22-MD-03047-YGR MDL No. 3047
This Document Relates to: [Insert Case Name and Number]	**PLAINTIFF FACT SHEET – SCHOOL DISTRICTS**

INSTRUCTIONS

Use of this fact sheet. Each school-district plaintiff that has filed a complaint in this action must complete this Plaintiff Fact Sheet. If more than one school district is a plaintiff on a single complaint, each individual school district must submit its own individual Plaintiff Fact Sheet. This Plaintiff Fact Sheet constitutes discovery responses subject to the Federal Rules of Civil Procedure. The information provided will only be used for purposes related to this litigation and may be disclosed only as permitted by the Protective Order entered in this litigation.

Terms used. "You," "your," "Plaintiff," and "School District" as used throughout this fact sheet refers to the school district completing this form. "Social media" refers to Defendants' social media platforms as described in your complaint.

Certification. In completing this Plaintiff Fact Sheet, you are representing that you are an authorized representative of the school district bringing the lawsuit. You must certify under oath that the information is true and correct to the best of your knowledge, information, and belief.

Instructions regarding requests for information. Do not leave any questions unanswered or blank; if you cannot recall all of the information requested, provide as much information as you can. You should insert additional space where necessary to answer the questions completely. You should consult with your attorney about completing this form. None of the requests are designed to require an expert evaluation or limit expert testimony. None of the requests are designed to require review of individual student records.

Instructions regarding document requests. For each question calling for the production of documents, indicate whether you possess any existing documents responsive to the request. A request will indicate where it only requires that you produce information that has already been compiled and/or exists in report, survey, analysis, study, or other document that provides an overview of or describes the indicated topic. If information has not been compiled or summarized on these topics, it does not need to be located, described, or produced for the purposes of this Plaintiff Fact Sheet. For example, you are not required to locate, compile, sort, describe or produce underlying records that might show, for example, the prevalence of student use of social media or expenses incurred to address problems arising from student use of social media; however, you are required to produce existing reports, surveys, analyses, studies, or other overviews on that topic.

To determine whether you have any responsive documents, you are required to investigate whether you have the information sought. This investigation might involve a district employee asking the appropriate person at each school to provide the district with documents or reports responsive to the requests. You do not need to create any new documents.

If you do possess any such documents, reports, surveys, analyses, studies, or other overview documents, then provide copies as they are kept in the ordinary course of business, without identifying any student-specific data.

I. CASE INFORMATION

1. Plaintiff: _____

2. Name of the court in which the complaint was initially filed:

_____

3. Case number in court in which complaint was originally filed:

_____

4. Filing date of the complaint: _____

5. Named defendants in the complaint:

_____

6. Name, firm, and e-mail address of the principal attorney(s) representing Plaintiff:

_____

II. REPRESENTATIVE CAPACITY

For purposes of Section II (Representative Capacity) "you" refers to the person filling out this form. When you complete the rest of this form "you," "your," "Plaintiff," and "School District" refers to the School District Plaintiff named in this action, including any departments, divisions, agents, and/or employees.

7. Name of individual(s) completing this Fact Sheet:

_____

8. Role within Plaintiff's organization:

_____

III. SCHOOL DISTRICT DATA

9. Provide the total number of schools in your district at each level from kindergarten through 12th grade from the 2017-2018 school year to present or the year for which data is most currently available:

Year	Level	Number of Schools
2023-2024	Elementary School	
	Middle School	
	High School	
	Other	
2022-2023	Elementary School	
	Middle School	
	High School	
	Other	

Year	Level	Number of Schools
2021-2022	Elementary School	
	Middle School	
	High School	
	Other	
2020-2021	Elementary School	
	Middle School	
	High School	
	Other	
2019-2020	Elementary School	
	Middle School	
	High School	
	Other	
2018-2019	Elementary School	
	Middle School	
	High School	
	Other	

Year	Level	Number of Schools
2017-2018	Elementary School	
	Middle School	
	High School	
	Other	

10. Provide the total number of students enrolled in your district, and the student population at each level from kindergarten through 12th grade from 2017-2018 to present or to the year for which data is most currently available:

Year	Level	Number of Students
2023-2024	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	
2022-2023	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	

Year	Level	Number of Students
2021-2022	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	
2020-2021	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	
2019-2020	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	
2018-2019	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	

Year	Level	Number of Students
2017-2018	District-Wide	
	Elementary School	
	Middle School	
	High School	
	Other	

11. Provide the total number of district employees from 2017-2018 to present or to the year for which data is most currently available (specified as Full Time Equivalents ("FTE") if available):

Year	Number of Employees
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	
2018-2019	
2017-2018	

12. Provide the total number of teachers employed by your district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available):

Year	Number of Teachers
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	
2018-2019	
2017-2018	

13. Provide the total number of on-campus health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors, etc.) employed by the district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available), as well as the total number of volunteers in these positions, if any:

Year	Number of On-Campus Health Care Workers	Number of On-Campus Health Care Volunteers
2023-2024		
2022-2023		
2021-2022		
2020-2021		
2019-2020		
2018-2019		
2017-2018		

14. Provide the total number of off-campus health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors, etc.) employed by the district from 2017-2018 to present or to the year for which data is most currently available (specified as FTE if available), as well as the total number of volunteers in these positions, if any:

Year	Number of Off-Campus Health Care Workers	Number of Off-Campus Health Care Volunteers
2023-2024		
2022-2023		
2021-2022		
2020-2021		
2019-2020		
2018-2019		
2017-2018		

15. Other than health care workers identified above, does the district have other employees who provide mental health services? **If yes,** provide the total number of such employees from 2017-2018 to present or to the year for which data is most currently available and their positions (specified as FTE if available), as well as the total number of volunteers in these positions, if any:

Year	Number of Employees	Number of Volunteers	Positions
2023-2024			
2022-2023			
2021-2022			
2020-2021			
2019-2020			
2018-2019			
2017-2018			

16. Provide the total number of health care workers (e.g., social workers, nurses, psychologists, psychiatrists, counselors) employed by the district whose primary responsibilities include addressing student mental health issues from 2017-2018 to present or to the year for which data is most currently available and their positions (specified as FTE if available)), as well as the total number of volunteers in these positions, if any:

Year	Number of Employees	Number of Volunteers	Positions
2023-2024			
2022-2023			
2021-2022			
2020-2021			
2019-2020			
2018-2019			
2017-2018			

17. Does your district maintain organizational charts depicting the district's general organizational structure?

Choose your answer (Yes/No): _____

If yes, please provide a copy of the organizational chart(s) for the most recent year it is available.

IV. PEOPLE WITH KNOWLEDGE

18. Identify the superintendent(s), vice/assistant superintendent(s), director of student and family services, director of school health and/or safety, director of technology, and chief financial officer/head of finance, or the individuals in equivalent positions, in your district from 2017-2018 school year to the present:

19. To the extent not listed above, identify the person(s), including their title/position, at the district level whose primary responsibility was the district's budget, funding, or grant procurement efforts from the 2017-2018 school year to the present:

20. Identify the person(s), including their title/position, in your district most knowledgeable about student use of social media on school property and the impact of such use on your district from the 2017-2018 school year to the present:

21. To the extent not listed above, identify the person(s), including their title/position, in your district most knowledgeable about student mental health issues from the 2017-2018 school year to the present:

V. DAMAGES

22. State generally in what way or how you claim you have been damaged by each defendant's alleged acts at issue in this lawsuit and approximately when that injury began.

23. Are you seeking any monetary damages?

Choose your answer (Yes/No): _____

If yes, identify each category of damages or monetary relief that you allege.

24. Are you seeking injunctive relief other than abatement?

Choose your answer (Yes/No): _____

If yes, provide a general description of the injunctive relief sought.

25. Are you seeking abatement (e.g. forward looking relief to address the problem, including continuation of existing programs, expansion of some or all of those programs, and/or creation of new programs)?

Choose your answer (Yes/No): _____

If yes, provide a general description of the abatement sought.

26. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes known expenditures and anticipated future expenditures made by your District, related to youth mental health?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the documents(s) responsive to this question.

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27. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes known costs incurred or damages sought as a result of any harms to your district which you attribute to social media?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify document(s) responsive to this question.

VI. INTERACTIONS WITH DEFENDANTS

28. Have you, any schools in your district, or any affiliated organization (i.e., a parent-teacher association) communicated with any of the Defendants regarding students' use of social media? Note: This question is limited to individuals authorized to speak on behalf of the district or school and is not meant to include marketing or routine customer service correspondence, e.g., account registration, password resets, help desk questions, or the district's use of Defendants' platforms for communicating with third parties.

Choose your answer (Yes/No): _____

If yes, please describe the timeframe and general nature of the communications.

29. Have you been involved in any other litigation against any social media company? For purposes of this question, "social media company" refers to any Defendant in this litigation and/or any other social media company not named in the Complaint.

Choose your answer (Yes/No): _____

If yes, for each lawsuit, state (1) the court in which the lawsuit was filed; (2) the case name; (3) the civil action or docket number assigned to the lawsuit; and (4) your involvement or claims in the lawsuit.

30. Has your district incorporated the use of any of Defendants' platforms in its curriculum since the 2017-2018 school year?

Choose your answer (Yes/No): _____

If yes, please generally describe and identify which platform(s).

31. Have you received any grant, donation, or other funding from any of the Defendants?

Choose your answer (Yes/No): _____

If yes, describe generally the grant/donation/funding, state the approximate date of receipt, and identify which Defendant it came from.

VII. SCHOOL POLICIES FOR ELECTRONIC DEVICES, INTERNET, AND SOCIAL MEDIA USE

32. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of the internet or social media on school property from the 2017-2018 school year to present?

    Choose your answer (Yes/No): _____

    If yes, attach copies of the relevant codes or policies.

33. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of the internet or social media off school property from the 2017-2018 school year to present?

    Choose your answer (Yes/No): _____

    If yes, attach copies of the relevant codes or policies.

34. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address teachers' use of the internet or social media on school property from the 2017-2018 school year to present?

    Choose your answer (Yes/No): _____

    If yes, attach copies of the relevant codes or policies.

35. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address teachers' use of the internet or social media off school property from the 2017-2018 school year to present?

    Choose your answer (Yes/No): _____

    If yes, attach copies of the relevant codes or policies.

36. Has the district drafted or implemented any disciplinary codes, policies, or codes of conduct that address students' use of electronic devices, e.g., cell phones, on school property from the 2017-2018 school year to present?

    Choose your answer (Yes/No): _____

    If yes, attach copies of the relevant codes or policies.

37. Has your district ever had a policy and/or program whereby students are issued tablets, laptops, or similar devices for students' use in the course of the school year for educational purposes?

Choose your answer (Yes/No): _____

If yes, please provide the policy since the 2017-2018 school year or generally describe the policy and/or program, including material changes since the 2017-2018 school year.

VIII. SOCIAL-MEDIA AND MENTAL HEALTH SERVICES AND PROGRAMS

38. Describe the portion of your student body receiving mental health services in your district and how it has changed over time since the 2017-2018 school year, including approximate numbers and percentages if available in any existing report, survey, analysis, study or other document that provides an overview of or describes student mental health services. Note: This question is not designed to require review of underlying individual student records.

39. Have you formally proposed, formed, or participated in any district-wide task force, other program, or group to address issues related to social media use or youth mental health among students?

Choose your answer (Yes/No): _____

If yes, identify the name of any such program(s), what aspects of student social media use and/or mental health were addressed, and the approximate dates of the district's participation in the task force, group, or program.

40. Have you formally proposed, formed, or participated in any district-wide task force, other program, or group to address behavioral issues, bullying, absences, substance abuse, mobile device use, addiction, and/or vaping?

Choose your answer (Yes/No): _____

If yes, identify the name of any such program(s), what student issues were addressed, and the approximate dates of the district's participation in the task force, group, or program.

41. Has your district provided trainings for employees on how to address student mental health issues relating to social media?

Choose your answer (Yes/No): _____

If yes, please generally describe what types of trainings were offered by your district, when they were offered, whether attendance at the trainings was mandatory or optional, and the categories of employees at the district that were required to attend.

42. Does your district use or provide any materials to students, parents, teachers, or staff regarding the potential risks or adverse effects of using electronic devices, the internet and/or social media?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

IX. INCIDENCE OF OTHER TRAUMATIC EVENTS

43. Was your district ever closed to in-person learning during the COVID-19 pandemic?

Choose your answer (Yes/No): _____

If yes, please generally describe when schools were closed, when remote learning was offered, and when students came back to in-person learning.

Please also provide any written district-wide policies implementing remote learning.

X. FINANCIAL INFORMATION

44. Provide the district's overall budget for each year from the 2017-2018 school year to the present.

Year	Overall Budget
2023-2024	
2022-2023	
2021-2022	
2020-2021	
2019-2020	
2018-2019	
2017-2018	

45. What is the approximate annual amount budgeted for health services in the district, if separately budgeted/itemized? Has that amount increased or decreased by more than 20% since the 2017-2018 school year?

Choose your answer (Yes/No): _____

If yes, please describe.

46. What is the approximate annual amount budgeted for mental health services in the district, if separately budgeted/itemized? Has that amount increased or decreased by more than 20% since the 2017-2018 school year?

Choose your answer (Yes/No): _____

If yes, please describe.

XI. DOCUMENTS RELATING TO MENTAL HEALTH, SOCIAL MEDIA USE, OTHER EVENTS, AND EXPENDITURES

A. Prevalence

47. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of or number of students with reported mental health issues in your district and the possible causes of those issue?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

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48. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of the harms associated with student social media use in your district, including associated mental health issues and classroom disruption?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

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49. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of students in the district receiving mental health services through the district?

Choose your answer (Yes/No): _____

If yes, provide a copy (should include students at each level if part of the document(s)) and identify the document(s) responsive to this question.

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50. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes the prevalence of social media use in your district and/or the impact of social media use in your district?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

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51. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes traumatic events, i.e. school shooting, violence at school by a non-student or non-staff members, or threats of violence?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

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52. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes attempted or completed suicides among staff or students?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question

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B. Discipline measures

53. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes interventions, discipline, or other consequences imposed on students for using social media on school premises?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

54. Do you possess any existing report, survey, analysis, study or other document that provides an overview of or describes disciplinary issues among students in your district, possible causes of those issues, and any interventions and/or consequences imposed?

Choose your answer (Yes/No): _____

If yes, provide a copy and identify the document(s) responsive to this question.

CERTIFICATION

I have made reasonable inquiries to answer the foregoing questions. Based on my personal knowledge and the information provided by other district employees, I declare under penalty of perjury that the information provided in this Plaintiff Fact Sheet is complete, true, and correct to the best of my knowledge and information, and that I have provided all of the requested documents that are reasonably accessible to me and/or my attorneys, to the best of my knowledge.

_____	_____
Signature	Date
_____	_____
Name (Printed)	Title