

ATTORNEY GENERAL OF THE STATE OF NEW YORK
BUREAU OF INTERNET & TECHNOLOGY

In the Matter of

Assurance No. 24-088

**Investigation by LETITIA JAMES,
Attorney General of the State of New York, of**

SATURN TECHNOLOGIES, INC.,

Respondent.

ASSURANCE OF DISCONTINUANCE

The Office of the Attorney General of the State of New York (“OAG”) commenced an investigation pursuant to Executive Law § 63(12) and General Business Law § 349 into the privacy and data security practices of Saturn Technologies, Inc. (“Saturn Technologies” or “Respondent”) and its Saturn application (“Saturn App”). This Assurance of Discontinuance (“Assurance”) contains the findings of the OAG’s investigation and the relief agreed to by the OAG and Respondent, whether acting through its respective directors, officers, employees, representatives, agents, affiliates, or subsidiaries (OAG and Saturn Technologies collectively, the “Parties”).

OAG'S FINDINGS

Background

1. Saturn Technologies is a Delaware corporation with its principal place of business at 1 Liberty Street, 3rd Floor, New York, NY 10006. It was founded in 2018 and has raised more than \$62,000,000 in funding to develop the Saturn App.¹

The Saturn App is a Social Networking App

2. Saturn Technologies develops and publishes the Saturn App service for Google Android and Apple iOS mobile devices. The Saturn App has frequently been in the “top ten” list of most downloaded social network applications.² The Saturn App was designed for high school students and has served that community for over six years. In Fall 2024, the Saturn App was expanded to support college students.

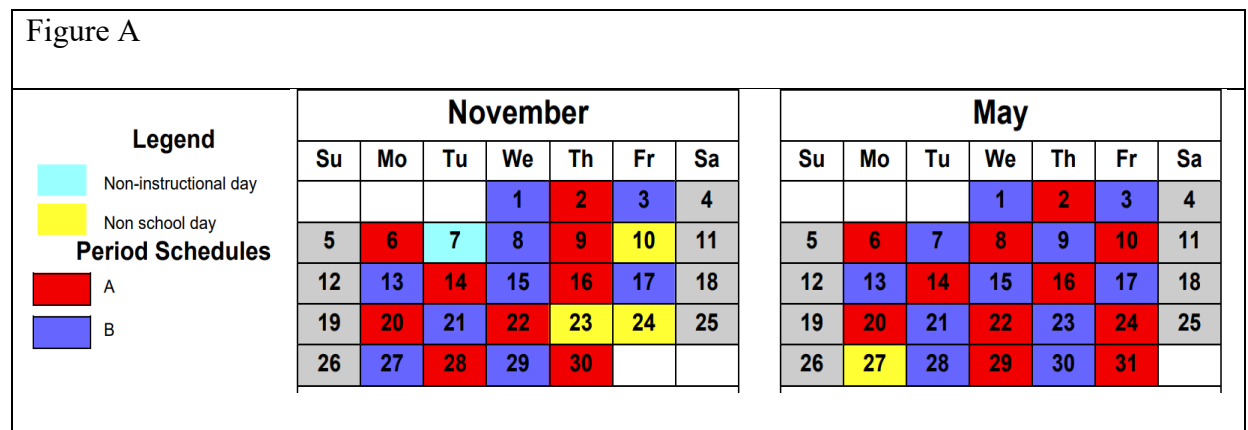
3. The Saturn App features a calendar and a wide variety of social network functionality, including: user profiles; user social media links; group chat; class chat; direct messaging; schoolwide “bulletin board” style messaging and replies (removed May 2024); school event schedules and attendees; and even private event invitations.

4. Saturn Technologies offers Saturn App users a unique benefit: After users create their account and select their school, high school students are able to access a special calendar already customized for their high school’s specific class schedule. This customized daily schedule is what makes the Saturn App so appealing to high school students.

¹Victor Rivero, *Young Visionaries Seek to Transform Student Life with Saturn App*, Edtech Digest (July 11, 2024), <https://www.edtechdigest.com/2024/07/11/young-visionaries-seek-to-transform-student-life-with-saturn-app> (last visited February 12, 2025).

²Alexandra Sternlicht, *Social Calendar Platform Saturn Raises 44 Million from Benioff, Bezos, and Von Tobel, Among Others*, Forbes (August 10, 2021), <https://www.forbes.com/sites/alexandrasternlicht/2021/08/10/social-calendar-platform-saturn-raises-44-million-from-benioff-bezos-and-von-tobel-among-others/?sh=33cf32044615> (last visited February 12, 2025).

5. High school daily schedules are uniquely complex. First, high schools have unusual and unpredictable daily schedules that change from school to school, such as rotating schedules, block schedules, A/B schedules, 4x4 schedules, drop schedules, and flex schedules. Second, holidays, non-instruction days, test days, and other unique daily options complicate each high school’s schedule even more. Third, different schools have different “bell schedules.” Bell schedules govern when classes start and end, the length of each class, and the amount of time between classes for students to travel from room to room.



6. For example, in a “4 day rotation schedule” there are four days of scheduled classes (A, B, C, D) and the specific schedule day changes each week: If “Day A” occurs on the Tuesday of week one, Day A would fall on Monday of week two, again on Friday of week two, then Thursday of week three, followed by Wednesday of week four. These weekdays would also change if there were holidays or non-instruction days during that time period. An example of an “A/B” or two day high school schedule is in Figure A. It is the Great Neck South high school’s A/B schedule for November 2023 and May 2024.

7. Similarly, New Rochelle high school uses a six day rotation schedule and four different bell schedules: Regular; 2 Hour Delay; AM Half Day; and Early Dismissal.³ All bell schedules provide five minutes between the first two classes of the day and then four minutes between all other classes. Classes run 48 minutes long on Regular days, 24 minutes long on AM Half Days, 33 minutes long on 2 Hour Delay days, and 36 minutes long on Early Dismissal days. All bell schedules start at 7:22 A.M, other than 2 Hour Delay which starts at 9:30 A.M. The school day ends at 3:07 P.M. for the Regular and 2 Hour Delay bell schedules. The AM Half Day bell schedule ends the school day at 11:55 A.M, and the Early Dismissal bell schedule ends the school day at 1:31 P.M.

8. As Saturn Technologies CEO Dylan Diamond explained, the Saturn App is a “social network built around the calendar” of high school students.⁴ Mr. Diamond has also noted that “This is not just a typical calendar. It is fun. It is emojiified. It is real time. It shows you your friends.” According to Saturn Technologies “Layering messaging and other social features for groups, clubs, and teams, on top of a calendaring utility that users rely on multiple times a day, the app has seen explosive growth . . .”⁵

9. In an interview with ARK Invest, Mr. Diamond explained that users join the Saturn App for the customized calendar but continue using the Saturn App for the social features, including allowing students to know where their friends are scheduled to be. In that context Mr. Diamond noted the unique accuracy of the Saturn App: While other applications merely show general location by “stacking” users on a map by latitude and longitude, the Saturn

³ *New Rochelle High School Bell Schedule*, NRED.org, www.nred.org/o/nrhs/page/bell-schedule (last visited February 12, 2025).

⁴ ARK Invest, *Breaking Down Classroom Walls with Saturn's Dylan Diamond*, YouTube (September 21, 2023), <https://www.youtube.com/watch?v=CYVghIQvlp4> (last visited February 12, 2025).

⁵ Saturn, *Saturn, the Calendar-Based Social Platform, Raises \$44 Million*, PR Newswire (August 10, 2021), <https://www.prnewswire.com/news-releases/saturn-the-calendar-based-social-platform-raises-44-million-301351734.html> (last visited February 12, 2025).

App has what Mr. Diamond referred to as “full accuracy” that shows the exact time and specific place a person is scheduled to be on their high school campus.

So you come for the utility but then you stay for the network. Because the second your friends join, your calendar gets supercharged. You can see in real time where people are and I don't mean where they are on a map latitude and longitude. Those are proxies for what event you're at and who you're at that event with. You know being people being stacked up on Snap map or find my friends doesn't give you quite a good picture of where they are on a college campus in a high school building. You have this concrete building on a satellite map you don't know where they are in the building. And you don't know more importantly where they will be. Saturn is the only platform that can tell you with full accuracy where people will be in the future and thus that allows you to spend your time with those that matter.⁶

10. The Saturn App includes information about a high school student community that is not generally available to outsiders. This information includes but is not limited to: class times and locations; class member names; class teacher names; school events; school event times; school event locations; and school event attendees. For example, a Saturn App user can see what day and time a certain class is meeting, which teacher is assigned to that class, the specific room that class is taking place in, and a list of Saturn App users that are in that class. Saturn App users can also see the title, date, time, location, and attendees for school events, such as the meeting of a student club. This information is uploaded by individual Saturn App users, but after it is uploaded by one Saturn App user the information can be accessed by other Saturn App users. *See Figure D.*

Saturn Technologies Promised Saturn Users a Safe and Secure Community Limited to Classmates Verified through High School Email Credentials

11. **Until August 2023**, Saturn Technologies promoted the Saturn App as using high school email credentials to verify that users were students enrolled in a specific high school.

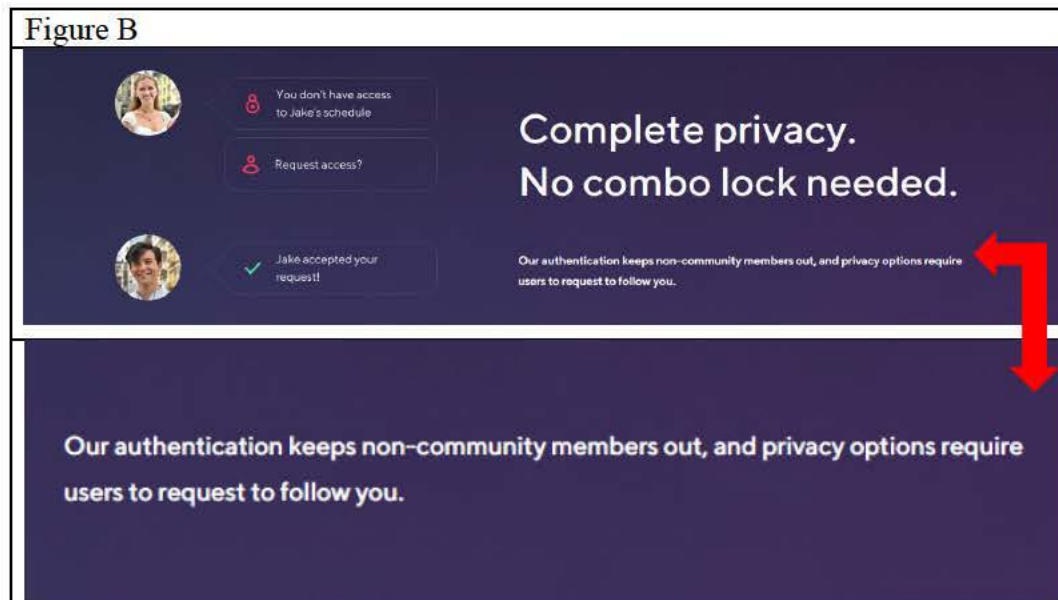
⁶ ARK Invest, *Breaking Down Classroom Walls with Saturn's Dylan Diamond*, YouTube (September 21, 2023), <https://www.youtube.com/watch?v=CYVghIQvlp4> (last visited February 12, 2025).

12. Except as noted below in paragraphs 19 and 20, between 2018 and summer 2021, every Saturn App user was required to verify their membership in a school community through a process called Open Authorization or “OAuth”. The OAuth process allows third parties like Saturn Technologies to confirm the validity of Google or Microsoft user credentials for a school district provided email account. The OAuth process does not share account password data with the third party but instead issues “authorization tokens” that confirmed the entered credentials were valid.

13. After a user’s high school email credentials were confirmed, they had access to their own high school community on the Saturn App. Between 2018 and early 2021, if a user could not authenticate their high school email credentials, they could not use the Saturn App. As detailed below in paragraphs 16 – 31, however, in 2021 Saturn Technologies stopped requiring all Saturn App users to authenticate their high school email credentials. Saturn Technologies did not announce this change or revise the content of its marketing materials until August 2023.

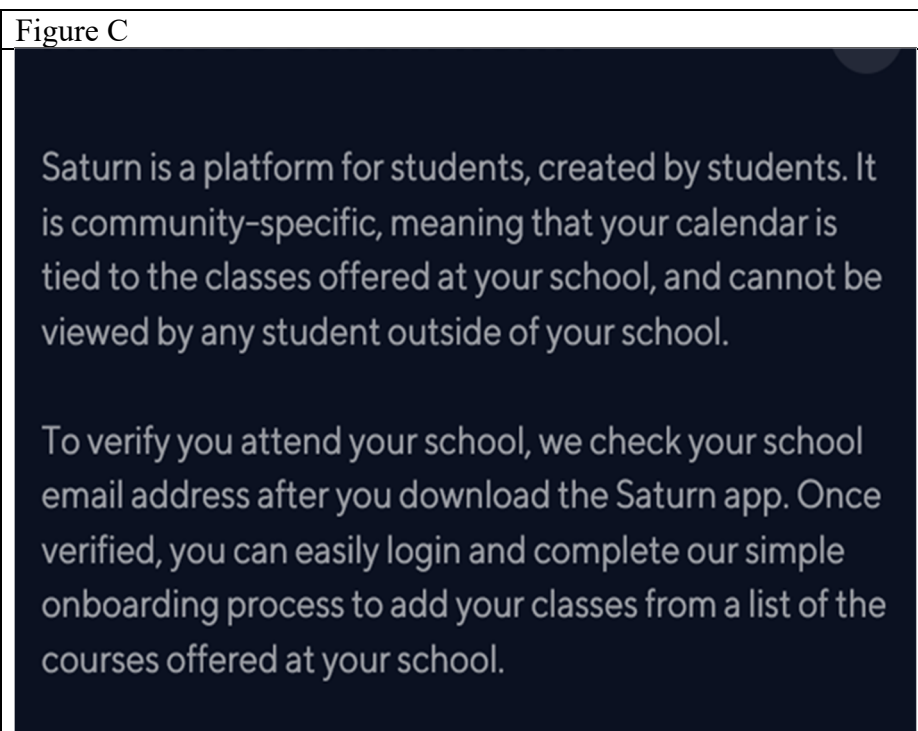
14. At various times between 2018 and August 2023, Saturn Technologies represented the Saturn App to users as a “safe and secure community,” with “complete privacy,” that is “community specific.” Saturn Technologies stated that it “verified” Saturn App user high school email addresses and promoted the app with an image of users being asked to “verify” their high school email credentials. Saturn Technologies claimed that “our authentication keeps non-community members out” and represented that the Saturn App did not allow non-students to join the Saturn App. For example (emphasis added):

- a. Prior to August 2023, the Saturn App iOS preview represented that the Saturn App was a “*Secure Community: Use your school provided Google or Microsoft account to log in.*”
- b. In 2019 and 2020, the Saturn App website promised “*Complete privacy. No combo lock needed. Our authentication keeps non-community members out, and privacy options require users to request to follow you.*” See Figure B.



- c. Between at least June 2020 and August 2023, the Saturn App privacy policy stated that “*Saturn only allows you to interact with other users from the same school.*” While the privacy policy also advised that “...we can’t guarantee that you or any other person will be given access to the appropriate school community on Saturn,” this statement does not modify the original representation or the other representations Saturn Technologies made.
- d. Between at least June 2020 and August 2023, the Saturn App Terms of Use promoted a secure community by stating “...As A Fundamental Aspect Of The Services, *Registered Users Are Only Permitted To Join And Participate In The App’s Online Community That Pertains To The High School They Attend. Accordingly, Our Service Will Attempt To Verify The High School Which You Attend . . .*”
- e. Between at least August 2020 and August 2023, Saturn Technologies’ website’s “Frequently Asked Questions” page (the “FAQ”) stated that it was verifying users by checking school email address: “*To verify you attend your school, we check your school email address* after you download the Saturn app.” Saturn Technologies also promised students that school emails were used “at log in to ensure you are placed into the right school with your friends and classmates.” The FAQ also explained that “Saturn is a platform for students It is

community-specific, meaning that your calendar is tied to the classes offered at your school, and cannot be viewed by any student outside your school. To verify that you attend your school, we check your school email address after you download the Saturn app.” See Figure C.



- f. On or around August 15, 2023, the FAQ was replaced by a “safety center” webpage that answers many of the same questions as the FAQ (the “Safety Center Page”). On that page, Saturn Technologies continued to describe the Saturn App as “community specific” and limited to users attending a particular high school. For example, in response to the question “What does the product do?” the Safety Center Page states that the Saturn App is “**community-specific, meaning you don’t mix with students at other schools.** We want to create the digital hub for your entire school community.”
- g. Since at least October 2020 Saturn Technologies’ www.joinsaturn.com website has hosted a “Law Enforcement Guidelines” page, which describes the Saturn App as a “safe and secure” student community: “Saturn is **a safe and secure online space** for students to connect with their calendar, activities, friends, and school.”

Saturn Technologies Adopted New Practices Without Modifying Its Representations of a Safe and Secure Community Verified through High School Email Credentials

15. **Between 2021 and August 2023**, Saturn Technologies adopted a number of practices contrary to its representations of a safe and secure community of student users whose school membership was verified through their high school email credentials. For example, at various times, Saturn Technologies simply **turned off** OAuth email authentication and other verification processes for certain high schools so **anyone** could join those Saturn App high school communities. Saturn Technologies also introduced “unverified” users with almost complete access to all Saturn App features for a selected high school community. Additionally, Saturn Technologies adopted a novel method of user verification based on “contact book overlap” of as few as three other users. During this time, Saturn Technologies also did not screen out fraudulent users based on age or location.

Saturn Technologies Selectively Turned Off All Verification for Over 4,000 Schools

16. Between 2018 and early 2021, the only sign-in credentials for the Saturn App was a user’s OAuth authenticated high school email credentials. If a user could not verify their high school email credentials, then that individual could not use the Saturn App.

17. Saturn Technologies realized that certain high schools did not allow OAuth authentication by third party applications. When some prospective Saturn App users entered their high school email credentials in the Saturn App to create an account, no OAuth authentication token was returned and they could not create a Saturn App account.

18. In 2020, the Saturn App began requiring users to confirm their mobile phone number in order to allow Saturn Technologies to turn off OAuth high school email account verification in the future.

19. In early 2021, Saturn Technologies began **turning off** OAuth verification at select schools that Saturn Technologies believed were blocking third party OAuth verification of high school email credentials. Some of these schools had verification turned off indefinitely. Other schools had verification turned off during select periods, such as the time before and after the start of a new school year (August and September).

20. On August 12, 2023, the last day before Saturn Technologies made certain membership changes, over 4,000 schools with Saturn App accounts had all verification requirements turned off and anyone could join these high school communities. This constituted approximately one quarter of all Saturn App schools. The number of “never verified” Saturn App accounts created at those schools between early 2021 and August 12, 2023 comprised approximately one quarter of all Saturn App accounts.

21. Between early 2021 and August 2023, these “never verified” users were indistinguishable from verified users. “Never verified” users had **complete** access to all of the Saturn App’s features, including access to user personal information. These “never verified” users had Saturn App access that was **identical** to users who had verified their Saturn App accounts with valid high school email credentials. Saturn Technologies did not provide notice to any of their high school student users that some Saturn App users had **not** been verified in any manner but had **complete** access to the Saturn App. *See* Figure D.

Figure D

Information or Feature	Accessible to “verified” users (all dates) & Accessible to “never verified” users (2021- 2023)	Accessible to “ <u>un</u> verified” users <u>BEFORE</u> August 2023	Accessible to “ <u>un</u> verified” users <u>AFTER</u> August 2023
Saturn User Full Name	Yes	Yes	First Name Only
Saturn User School Grade	Yes	Yes	Yes
Saturn User Profile Photo	Yes	Yes	Yes
Saturn User Friends List	Yes	Yes	No
Saturn User Profile Bio	Yes	Yes	No
Saturn User Social Media Account Links	Yes	Yes	No
Saturn User Birthday Alert (Friends)	Yes	Yes	No
Saturn User Birthday List (all Saturn users)	Yes (until 9/22)	Yes (until 9/22)	No
Saturn User Class Schedule	Yes (unless user opted out)	No	No
List of Saturn Users in Specific Class	Yes	Yes	Yes
Schoolwide Chat	Yes	Yes (view only)	No
Group-Based Chat	Yes	No	No
Class-Based Chat	Yes	No	No
User to User Chat (<u>Not</u> Friends)	Yes	No	No.
User to User Chat (Friends)	Yes	No	No.
Friending Other Users	Yes	Yes	No 8/23 - 12/23. Yes after 12/23.
School Event Attendees: Full Names	Yes	Yes	No
School Classes: Teacher Names	Yes	Yes	Yes
School Directory: Student Names	Yes	Yes	Yes (first name & picture)
School Bell Schedule	Yes	Yes	Yes
School Classes: Students In Class	Yes	Yes	Yes (first name & picture until joins class)
School Classes: Room/Location	Yes	Yes	No
School Event Details: Date/Time/Location	Yes	Yes	No

22. In August 2023, certain “never verified” users were transitioned to “unverified” status and a warning was added to the Saturn App “friending” process.

Saturn Technologies Introduces “Unverified” Users with Almost Complete Access to the Saturn App

23. In July 2021, Saturn Technologies also introduced “unverified” Saturn App users. These users authenticated their phone number but were not required to satisfy any high school student email verification process to join a Saturn App high school community.

24. Between July 2021 and August 2023, unverified users had **nearly** complete access to all of the Saturn App’s features and user personal information. Saturn Technologies did **not** provide notice to any of their high school student users that some Saturn App users had not been verified in any manner but had **nearly** complete access to the Saturn App. *See Figure D.*

25. Between July 2021 and August 2023, the only restrictions on unverified users were that the unverified user could not view a verified student’s profile page class schedule or use some chat functions. The unverified user could gain access to some of those features, however, if they became “friends” with a verified student through an accepted friend request. For example, between July 2021 and August 2023, unverified users could:

- a. view a verified student’s picture, bio, and social media links (if any had been added by the verified student);
- b. view class-based schedules that showed whether a verified student was enrolled in a particular class at a certain day and time;
- c. view information about teachers that students entered into the Saturn App;
- d. view schoolwide chat; and
- e. “friend” verified students.

26. Verified Saturn App users cannot tell if someone on the app is an unverified user. Prior to August 2023, Saturn App users were not even warned that a “friend request” was from an unverified user. A warning was added to the friendship request process in Fall 2023.

Saturn Technologies Adopts the “Contact Book Overlap” Verification Method

27. In July 2021, Saturn Technologies stopped requiring any Saturn App users to verify their accounts with their high school email credentials. Although the option remained in the account creation flow, users could skip email verification entirely.

28. Around the same time, Saturn Technologies began using a novel method of “verification” that it created in-house called “contact book overlap.” With this method, Saturn Technologies compared the phone number of a new user with those found in the contact books of existing users.

29. Between July 2021 and August 2023, if a new user appeared in three contact books of users who claimed to attend the same school, the new user would be verified as attending that school. Saturn Technologies did not require that the contact “overlaps” appear in contact books of users verified with school email credentials. If a new user did not satisfy “contact book overlap” verification or complete optional OAuth authentication, they became an “unverified” user. Every time an unverified user opened the Saturn App, Saturn Technologies performed a new contact book overlap check to determine if the user could be verified.

30. Saturn Technologies adopted the “contact book overlap” user verification method without first confirming it was effective based on competent and reliable scientific evidence. Saturn Technologies did not perform any testing, risk assessments or analysis on the contact book overlap method prior to adoption or after introduction of “contact book overlap” verification to determine (a) if it accurately identifies students at a particular high school or (b)

if it is a secure method that cannot be easily abused. Saturn Technologies did not disclose that it used “contact book overlap” in its high school student verification process until August 2023.

31. In short, Saturn Technologies promised Saturn App users that they were joining a safe and secure community of classmates who had been verified by submitting their high school email credentials. But, between July 2021 and August 2023, Saturn Technologies made OAuth email authentication optional, allowed “never verified” users to have complete access to the Saturn App, allowed “unverified” users to have almost complete access to Saturn App features, and adopted the novel “contact book overlap” form of user “verification” without competent and reliable scientific evidence it accurately verified a school’s students. The end result was that new users were able to access the Saturn App without meeting the high school email credential verification standard promoted by Saturn Technologies.

Saturn Technologies Did Not Screen Out Users Based on Birth Date or Location

32. Although Saturn Technologies claimed it verified that Saturn App users were high school students, prior to August 2023, Saturn Technologies did **not** screen out users who entered adult birthdates during account creation. A new user could enter any birthdate indicating an age over thirteen and successfully create a Saturn App account.

33. It was not until August 2023 that Saturn Technologies began using birth dates to block users over the age of nineteen from joining the Saturn App.

34. Moreover, as of the date of this Assurance, Saturn Technologies also does **not** block “graduate” users from the Saturn App. These users retain their Saturn App accounts after their “class of” graduation date. In June of each year Saturn Technologies does clear all “graduate” users’ choice of high school community, but these users retain their Saturn App account and can rejoin any school. Saturn Technologies has also taken no steps to prevent these graduate users from choosing to rejoin any high school community.

35. Finally, as of the date of this Assurance, Saturn Technologies also does **not** screen out new users or detect fraudulent accounts based on location, even though Saturn Technologies has access to location data and uses it for other purposes. This means that local high school Saturn App communities remain open to fraudulent accounts created by anyone in any state or any country.

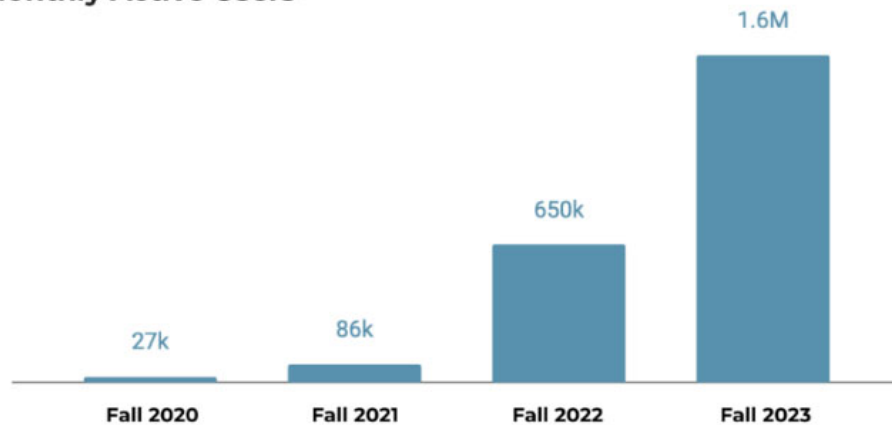
The Majority of Saturn App Users Were Never Verified Using Student Email Credentials

36. By August 2023, less than thirty percent of all Saturn App accounts were OAuth verified using high school email credentials. More than seventy percent of all Saturn App accounts were unverified, “never verified”, or verified by “contact book overlap.”

37. “Active monthly users” are a subset of the total number of users who have created Saturn App accounts, specifically the number of accounts that actually used an application in a specific month. Between 2018 and Fall 2021, the Saturn App had grown to 86,000 active monthly users. Between Fall 2021 and Fall 2023, the Saturn App user base exponentially increased. By Fall 2023 the Saturn App had over 1.6 million active monthly users. *See* Figure E. This exponential growth primarily consisted of users who did **not** verify their high school email credentials. By December 2023 the total number of Saturn App accounts was approximately two and a half million users. Less than thirty percent of those users were verified through OAuth authentication of their high school email credentials.

Figure E

Monthly Active Users



Max Baron and Dylan Diamond, *Lessons on Building a Viral Consumer App: The Story of Saturn*, Lenny's Newsletter (December 5, 2023), <https://www.lennysnewsletter.com/p/lessons-on-building-a-viral-consumer> (last visited February 12, 2025).

The Public Learns that Saturn Technologies Does Not Verify Saturn App Users Are Actually Students

38. In early August 2023, a media safety group posted reviews of the Saturn App expressing their concerns about the range of information that unverified Saturn App users could access about high school students.⁷ Then, on August 10, 2023, a concerned parent posted on social media that he had joined the Saturn App to gauge whether it was safe for his high school student daughter. He described being alarmed to find out that he was able to join the Saturn App and access some personal information about local high school students without verifying

⁷ Protect Young Eyes (@protectyouneyes), Instagram (August 3, 2023), <https://www.instagram.com/protectyouneyes/reel/CvgTs89utOt/> (last visited February 12, 2025); Protect Young Eyes, *Saturn App Review*, archived August 13, 2023 at the Wayback Machine, <https://web.archive.org/web/20230813233814/https://protectyouneyes.com/apps/saturn-app-review-is-it-safe> (last visited February 12, 2025).

that he had a valid high school email account. The parent's social media post was widely shared.⁸

39. These events were followed by widespread news coverage and numerous social media posts expressing concern about the Saturn App. Some of these stories were critical of the amount of student personal information they could access as "unverified" Saturn App users, while others complained that they were granted full Saturn App access although they had never verified their high school email credentials.

40. Saturn Technologies received complaints from teachers, administrators, and parents expressing concern about the Saturn App:

"I was reading the apps safety and security features and I decided to try it out for myself if my child is going to be using this app. Turns out any random person can join Saturn and have access to any school and any child's (who is on the Saturn app) schedule. Please do better. I signed in and had access to my daughters entire school and their schedules. This is extremely alarming and every parent deserves better for their child."

"You need to change how easily it is to access children's schools. I can create a fake name, age and still see school schedules and kids linked social media accounts. A app like this can easily be accessed to an intruder or predator. It should not be that easy to access kid's information being a kids app! They should only be allowed access to even create an account by their student email as that would protect unwanted people from accessing a child or school."

"Lots of parents are finding they can set up fake accounts and get access to any school they want and see plenty of details without verifying any email address. Pretty much any creep can sign up and stalk kids. One dad even started getting friend requests without any email verification. . . . I hope your company takes these posts seriously and starts locking down the app better. No information should be available at all without school email verification first."

"Your app is unsafe. Market it as "safe" all you want. It's not. You are setting students up to be potentially targeted by predators. It is absolutely disgusting you still have this app up and running. I hope to God no child gets put in danger by this app but there is a high probability that is already happening."

⁸ Chris Cullum, Facebook (August 10, 2023), www.facebook.com/chris.cullum.376/posts/pfbid02WJwrZ9JxX4Af7xbZmYGokQZiin4V5ujxm5bdeB4oBeynUhJ5RMqbXtuVhn8qGCijl (last visited February 12, 2025).

“. . . I was able to create an account and register as a student at one of our high schools with no real verification other than a text to my phone. I found 45 students from this high school and had total access to see schedules, contact information and specially their Snapchat avatar. This is very concerning as it allows predators to sign in without verifying if they are a true student.”

“Have you thought about the potential repercussions from your app being used in the wrong way- they are deadly! What is to stop a mass shooter from using your app to plan their attack room by room? In this day and age, how can you so carelessly put something out there without proper controls that could endanger the lives of our children!”

“As a teacher who had left an abusive relationship which did involve police and court involvement concerning stalking, I guarantee you are in for several lawsuits should you keep teacher info available. I will personally be speaking with an attorney in the coming days as my school, name, and classroom # is visible to anyone who looks on your app. How dare you put children and teachers in danger. There have been 23 school shootings this year alone. Now you have made it possible for anyone to look up exactly where students and teachers are for 8 hours a day.”

“I have always appreciated the convenience and functionality that the Saturn app offers in managing my child's tasks and schedules. However, the discovery of this security flaw has left me profoundly worried about the safety of my child and other students. Allowing unrestricted access to the schedules of students is an alarming breach of security and privacy, which could have severe consequences.”

Saturn Technologies Announced Improved Security Practices and Strengthened Student Verification

41. Saturn Technologies immediately announced changes to the Saturn App in response to this public criticism. On August 12, 2023, Saturn Technologies published an announcement on its website titled “Keeping Students Safe on Saturn” that announced “a suite of improvements” to student safety on the Saturn App. That blog post included the following statements (emphasis in the original):

We want to be clear: our most important job is keeping students safe—and we take this responsibility very seriously. We’re constantly working to make Saturn safer for every user on the platform. . . . A big part of this commitment is aiming to make sure that everyone who is part of a school community on Saturn is actually a student at that school. Verification is important not only for safety but also for protecting the integrity of each community on the platform. Verifying students on Saturn relies on a combination of different processes and dozens of signals, including contact book overlap and/or school email verification. Our teams are constantly working on improving the verification system and widening our utilization of email verification where possible. As part of this ongoing effort, we’re releasing a suite of improvements in our app . . .

We’re strengthening verification: We’ve raised the bar for the amount of contact overlap users must have with other students at a school to be verified If a user fails to verify using our improved protocol, their account will be restricted from participation in any school community and eventually removed.

Unverified users are walled off from verified users and their information: Users who are not verified can’t view any class details, students’ profiles (including their list of classes or links to their connected social profiles), or access or post to the school’s Bulletin . . .

42. Saturn Technologies also updated its website on or around August 13, 2023 and reiterated its student verification and safety claims. The new Safety Center Page stated that Saturn is “community specific,” “for students only,” “designed to be used only by active students in high school”, and that users “don’t mix with students at other schools.” That webpage also stated that Saturn Technologies did not allow adults to join the Saturn App and that “we take student safety extremely seriously and are constantly working on building new features to help make sure students stay safe when they are on Saturn.”

43. A few days later, on August 17, 2023, Saturn Technologies published a second announcement titled “More Safety Improvements for Students.” The subtitle of this announcement promised “We’ve released a new version of Saturn—our second in a week—*that raises the bar for security*. We’re also actively removing every suspected non-student account on the platform.” (Emphasis added.)

Saturn Technologies Adopts the “Friendship” Verification Method

44. As described above, Saturn Technologies made a series of **new** promises in August 2023 to strengthen verification of Saturn App users and limit the Saturn App to verified high school students. Saturn Technologies announced that it was “strengthening verification” and removing any “user [that] fails to verify using our improved protocol.” Saturn Technologies also claimed that it had “created a very strict set of rules for verification,” “instituted changes” that “raise the bar for security,” and that it was “actively removing every suspected non-student account on the platform.” Saturn Technologies promised that it is “serious about keeping our users safe” and would “continue to build features that help keep Saturn a safe platform for students to spend time with students in their community.” Saturn Technologies also promised to “widen[] our utilization of email verification where possible.” Around the same time, Saturn Technologies took some steps to improve the safety and security of the Saturn App, such as starting to use the birthdate entered by users to screen out new users over 19 years of age and restricting some of the features that unverified users could access. *See* Figure D. Saturn Technologies also temporarily increased the number of “contact list overlaps” required to verify a user to four, before reducing it again to three in September 2023.

45. In Fall 2023, however, Saturn Technologies developed a novel method of verification it called “friendship” verification. In December 2023, Saturn Technologies adopted the “friendship” user verification method without first confirming it was effective based on competent and reliable scientific evidence. Saturn Technologies did **not** perform any testing, risk assessments, or analysis prior to adoption or after introduction of “friendship” verification to determine (a) if it accurately identifies students at a particular high school or (b) if it is a secure method that cannot be easily abused.

46. Saturn Technologies also did not clearly explain to users that “friendship” would be utilized to “verify” Saturn App users were high school students in a particular school. In a December 17, 2023 blog post titled “A New Way to Connect with Friends on Saturn,” Saturn Technologies explained that “friending” would be an “additional signal” in the Saturn App user verification process (emphasis in original):

Friending as a Verification Signal

Finally, friending will be a pathway for users to get verified and access our full product experience: if a user has friend requests accepted by a certain number of verified others, we will use this as an additional signal in our user verification process and verify them. Verification on Saturn can happen in a variety of ways, including via contact book overlap and school email verification. The steps described in this post will further strengthen our system’s accuracy and should allow more legitimate students to get verified, addressing user feedback.

47. After this announcement, Saturn Technologies used “friendship” as a primary method to verify Saturn App users were students in a particular school community.

48. Between December 17, 2023 and January 11, 2024, Saturn Technologies verified Saturn App users who were friends with at least five other users, only three of which had to be verified themselves. On January 12, 2024, Saturn Technologies modified the friendship verification process to verify Saturn App users who are friends with as few as a **single** verified user. Specifically, Saturn Technologies’ friendship verification program authenticates a Saturn App user as a verified student in a specific school if their “friend request acceptance rate” was at least fifty percent and at least one friend was verified. No minimum number of friends or friend requests is required under the “friendship” method. The verified friends are also not required to have authenticated their high school email credentials via OAuth: they can be verified through the friendship or contact book overlap methods.

49. The unproven and untested “friendship” verification method significantly weakened the Saturn App verification process.

Saturn Technologies Allows Certain Unverified Users Continued Access to High School Student User Personal Information

50. As noted in paragraph 20 above, before August 13, 2023 approximately one quarter of all Saturn App “full access” accounts were “never verified” users that created their accounts without any verification. In addition, approximately twenty percent of all Saturn App accounts were “unverified” users. By August 12, 2023 these two groups of users accounted for almost half of all Saturn App accounts.

51. Prior to August 13, 2023, both “never verified” and “unverified” users could “friend request” verified Saturn App users without any warning that the user was not verified to be a member of a specific high school community. On August 13, 2023, “never verified” users that did not satisfy the “contact list overlap” criteria were transitioned to “unverified users.

52. Also, on or around August 13, 2023, Saturn Technologies changed the permissions for **new** unverified user accounts, so they did not have the ability to friend or chat with verified users. But Saturn Technologies allowed **existing** unverified user accounts to retain their pre-existing “friendships” with verified users, including being able to access their profiles, and access their social media links, and see their schedules.

53. As a result of retaining those friendship connections, unverified users continued to be able to access certain personal information of verified Saturn App users **after** Saturn Technologies’ security improvement announcements in August 2023.

54. In addition, because Saturn Technologies allowed existing unverified users to continue being “friends” with verified users, many of these unverified users were immediately “friendship” verified as Saturn Technologies rolled out the “friendship” verification program in December 2023.

Saturn Technologies' Collection, Use, and Retention of High School Student User Phone Contact Books

55. Saturn Technologies requests access to high school student's phone contact books so students can "see your classmates!" or "see who's in your section!"

56. Saturn Technologies did not inform high school students that it would copy and use their contact books to "verify" new Saturn App users through "contact book overlap."

Saturn Technologies also did not inform high school students that - even if the user revoked access at the device level - the company would keep a copy of the contact book and continue using it.

57. Saturn Technologies did not provide a process in the Saturn App for the user to rescind permission to use their contact book. Saturn Technologies also did not explain to high school students: (a) how to revoke contact book access permission at the device level, (b) that Saturn Technologies uploads and keeps a copy of their contact book, (c) that Saturn Technologies continues to retain and **use** that copy of their contact book after access is revoked, or (d) how to request that Saturn Technologies delete the contact book copy it retained.

58. The Saturn App Privacy Policy between June 4, 2020 and August 9, 2023 specifically stated "Your Contacts. To help you interact with classmates through Saturn, we – with your permission – may collect information about your contacts. You can also invite your contacts to join Saturn." Saturn Technologies provided no other **specific** information to students regarding the collection, use, or retention of their phone contact book. The Privacy Policy during that time did contain **general** language that information collected from users would be used to "give you a better experience using our services" such as "operating," "maintaining," and "protecting" the Saturn App and "enhancing the safety and security of our products and services."

59. As of August 9, 2023 the Saturn App privacy policy included the statement “Adjust contact book and location preferences. You can revoke Saturn's access to your contact book and your precise geolocation by adjusting your device settings.” But Saturn Technologies still did **not** advise students that Saturn Technologies would continue to use the last copy of their contact book unless the student deleted their Saturn App account or emailed Saturn Technologies to request contact book deletion.

The Saturn App Student Ambassador Program Does Not Disclose Material Connections

60. The primary marketing program for the Saturn App prior to August 2023 was its student “ambassador” program (the “Ambassador Program”).

61. Saturn Technologies sought out the most popular high school students to become “Student Ambassadors,” including campus leaders, sports team members, student council members, school newspaper members, and members of school clubs. Students were also asked for their Instagram account name so Saturn Technologies could confirm how many Instagram followers the student had and how far their posts would reach.

62. Student Ambassadors earned “points” for completing weekly marketing tasks assigned by Saturn Technologies, including creating original Saturn App related social media content, posting Saturn Technologies created social media content, reviewing the Saturn App on various platforms, and encouraging their fellow students to use the Saturn App. Student Ambassadors at a particular school also earned points by “competing” against other schools for the highest number of Saturn App users.

63. The points could be redeemed for rewards such as cash value gift cards, Saturn App branded promotional items, third-party gift cards, and other benefits.

64. The Ambassador Program was a critical marketing tool for launching the Saturn App in new schools and regional markets. Saturn Technologies co-founder Dylan Diamond described the how the Student Ambassador program helped the company “take over” a school within hours of launching, stating that the Student Ambassadors

spread the word on ‘launch night’ and in the days that followed . . . growing at a school was as simple as orchestrating Facebook posts in school-related groups and texts in group chats to help make sure people knew the app was available. Over time, we honed this process, adding sharing links, developing custom landing pages, and adding dynamic content that could be shared directly to your social stories—all of this with the goal of making it easier to invite your friends to join you.⁹

65. Using the Student Ambassadors to promote the Saturn App in group chats and in social media channels was so successful during this period that when the Saturn App launched in a new school, it would have hundreds of users within two hours of a launch and within 48 hours over fifty percent of the school was using the Saturn App.

66. Although Saturn Technologies compensated the Saturn Ambassadors for marketing the Saturn App, Saturn Technologies did not disclose this to users or provide the Student Ambassadors with any training or guidance on complying with advertising rules. As a result, for example, the Student Ambassadors did not disclose in their social media posts and app reviews that (i) they were acting at the direction of Saturn Technologies, and/or (ii) they were being compensated by Saturn Technologies.

⁹ Max Baron and Dylan Diamond, *Lessons on Building a Viral Consumer App: The Story of Saturn*, Lenny’s Newsletter (December 5, 2023), <https://www.lennysnewsletter.com/p/lessons-on-building-a-viral-consumer> (last visited February 12, 2025).

Respondent's Violations

67. New York Executive Law § 63(12) prohibits persons or business entities from engaging in repeated fraudulent or illegal acts or otherwise demonstrating persistent fraud or illegality in the carrying on, conducting, or transaction of business.

68. GBL Article 22-A prohibits deceptive acts or practices in the conduct of any business, trade, or commerce in this State. GBL § 349.

69. The OAG finds that the practices described above constitute repeated violations of GBL §§ 349, 15 U.S.C. § 45, and New York Executive Law § 63(12).

70. Saturn Technologies neither admits nor denies the OAG's Findings, paragraphs 1 through 69.

71. The OAG finds the relief and agreements contained in this Assurance appropriate and in the public interest. THEREFORE, the OAG is willing to accept this Assurance pursuant to Executive Law § 63(15), in lieu of commencing a statutory proceeding and to discontinue its investigation.

IT IS HEREBY UNDERSTOOD AND AGREED, by and between the Parties:

RELIEF

72. Respondent shall comply with Executive Law § 63(12), GBL § 349, 15 U.S.C. § 45, the FTC Guide Concerning the Use of Endorsements and Testimonials in Advertising, and 16 CFR Part 255, in connection with the Saturn App, including, but not limited to, advertising the Saturn App and verifying that Saturn App users are members of a specific school community.

73. By May 31, 2025, Saturn Technologies shall create and maintain a marketing training program reasonably designed to instruct employees on how to comply with applicable

state and federal marketing requirements, including, but not limited to, the requirements of the FTC's endorsement guidelines; such program shall also document Saturn Technologies' oversight process to monitor compliance.

74. By May 31, 2025, Saturn Technologies shall create and maintain a marketing training program reasonably designed to instruct non-employee marketers (including, but not limited to, the Student Ambassadors) on how to comply with applicable state and federal marketing requirements, including, but not limited to, the requirements of the FTC's endorsement guidelines; such program shall also document Saturn Technologies' oversight process to monitor compliance.

75. Saturn Technologies shall document any changes to Saturn App policy, procedure, and/or code that relate to user authentication, user privacy, data permissions, and data privacy; including, but not limited to, creating and retaining planning documents, change logs, revision records, and images of user interfaces. Such documents shall be sufficiently detailed to accurately identify the change made, the date of the change, the users affected by the change, the version number of any change, any user notices regarding such change, and whether users accepted new policies or terms.

76. Except as provided in this paragraph, a Saturn App user shall not be able to access any attendance, schedule, or location information about non-Saturn App users (including, but not limited to, students, teachers, and administrators) that the Saturn App user has not themselves entered into the Saturn App. The Saturn App may display, to registered users associated with a particular school, the name of school personnel assigned to teach a particular class, provided that, by May 31, 2025, Saturn Technologies makes available on its website a simple, one-step opt-out process that allows school personnel to permanently prevent their identifying information from any such display in the Saturn App. School administrators shall

be allowed to use the opt-out process on behalf of individual school personnel upon checking a box to confirm that the school administrator is authorized by that individual. Saturn Technologies may only require the submission of the name, email address, school name, and school address of the individual (and, if applicable, the school administrator submitting the request). For the avoidance of doubt, “identifying information” includes first name, last name, initials, image, and/or any other information that could be used to identify the individual.

77. By May 31, 2025, Saturn Technologies shall:

- a. delete all copies of a Saturn App user’s contact book at the time that a user deletes their account;
- b. provide Saturn App users with an account setting option to revoke permission to access the user’s contact book; and
- c. provide Saturn App users with an account setting option to delete any retained copy of their contact book.

78. Within thirty days of the date the account settings required by paragraph 77 are accessible in the Saturn App, Saturn Technologies may not retain or use Saturn App user phone contact books of any Saturn App user that revoked or revokes access at the device level.

79. Saturn Technologies Claims Regarding Saturn App Users:

- a. User Safety Claims: Saturn Technologies shall not claim (whether directly or indirectly, express or implied) that the Saturn App is exclusive, safe, secure, restricted, limited, or make any similar claim, unless Saturn Technologies has a reasonable basis for making such claims that is based on competent and reliable scientific evidence.
- b. User Validation Claims: Saturn Technologies shall not make any claims (whether directly or indirectly, express or implied) to verify, authenticate,

validate, corroborate, substantiate, test, evaluate, identify, or confirm that Saturn App users are students enrolled in a particular school, or make any similar claim, unless Saturn Technologies (i) has a reasonable basis for making such claims that is based on competent and reliable scientific evidence, and (ii) within the Saturn App clearly and conspicuously identifies any users that are not validated.

“Clear(ly) and conspicuous(ly)” as used in paragraphs 79 and 80 means in type at least the same size as the primary type used on the majority of other Saturn App pages and (x) in larger type than the surrounding text, or (y) in contrasting type, font, or color to the surrounding text of the same size, or (z) set off from the surrounding text of the same size by symbols or other marks, in a manner that clearly calls attention to the language.

80. Saturn App Users: By May 31, 2025, Saturn Technologies shall:
- a. For all existing users, who joined the Saturn App on or prior to that date:
 - i. require such users to proceed through a series of non-skippable screens before being able to use the Saturn App, that clearly and conspicuously,
 1. includes the following in separate, bold bullets: (x) “Saturn enables users to select the school community they join”, (y) “Saturn does not confirm users are students at the selected school”, and (z) “If you continue to use Saturn, you may interact with and share information with users who are not members of your school community”;
 2. obtain express consent to continue using the Saturn App;
 3. provide such users with a link to the account setting page where they can delete their account, if they so choose;

4. provide such users with the options to review and edit their entire friends list before proceeding; and
5. require such users to proceed through a non-skippable process before being able to use the Saturn App, that clearly and conspicuously provides them with the option to adjust their current privacy settings, which shall
 - a. include a clear and conspicuous, easily understandable, explanation of the Personal Information setting options;
 - b. have no design preferences or content favoring any particular privacy choices;
 - c. allow users to adjust their privacy settings to hide their Personal Information from Saturn App users who are not their Saturn App “friends.”

In addition:

6. The user interfaces described in 80(a)(i), including but not limited to notice text, shall be subject to approval of the OAG, which shall not be unreasonably withheld.
 7. Saturn Technologies may, at their discretion, choose to delay completion of the process described in 80(a)(i)5, so long as Saturn App users are required to complete such process within the next five days or three log ins (whichever is later) after they complete process described in 80(a)(i)1-80(a)(i)4.
- ii. until the process required by paragraph 80(a)(i) is completed by the user, prevent the disclosure of such users’ personal information to other Saturn App users (except for the disclosure of first name, last name, and non-expandable thumbnail user image of pre-existing friends to users reviewing and editing their friends list in connection with 80(a)(i)(4)),

including, but not limited to, the Saturn App user's last name, photo(s), bio, social media account links, schedule, birthday, class attendance, and event attendance ("Personal Information"); and

iii. for the avoidance of doubt, the processes required by paragraphs 80(a)(i) and 80(a)(ii) may be rolled out over a period of time prior to May 31, 2025, so long as all such accounts are affected no later than May 31, 2025.

b. For all existing and future Saturn App users under the age of 18:

i. clearly and conspicuously provide settings to hide their Personal

Information from other users, including, but not limited to, the ability to hide their Personal Information from Saturn App users who are not their Saturn App "friends"; and

ii. at least every six months require such users to proceed through a

dedicated, non-skippable Personal Information setting review process, before being able to use the Saturn App, that is materially the same as the process described in 80(c).

c. For all Saturn App users under the age of 18 who join the Saturn App after May 31, 2025

i. require such users to proceed through a dedicated, non-skippable

Personal Information setting process, before being able to use the Saturn App (other than for account creation), that

1. includes a clear and conspicuous, easily understandable, explanation of the Personal Information setting options including, but not limited to, for each setting what Personal Information is visible or hidden to friended users and non-friended users;

2. may default to any privacy choice that is legally permissible and

complies with this Assurance, so long as it there is no other design preferences or content favoring any particular privacy choices;

3. requires users to actively confirm their privacy settings from all available privacy options, which shall include, but not be limited to, the ability to hide their Personal Information from Saturn App users who are not their Saturn App “friends”; and
 4. includes the following statements, clearly and conspicuously, directly above all privacy choices, in separate, bold bullets: (x) “Saturn enables users to select the school community they join”, (y) “Saturn does not confirm users are students at the selected school”, and (z) “When you use Saturn, you may interact with and share information with users who are not members of your school community”.
- d. By May 31, 2025, for all existing and future Saturn App users
- i. there shall be a privacy option in the user’s account settings to hide or show the user’s linked social media accounts to non-friends, and
 - ii. for all new users under the age of eighteen this social media link account setting shall be defaulted to hide social media links from non-friends.

81. Respondent shall create and update at least annually all documentation and records necessary to demonstrate full compliance with each provision of this Assurance.

OAG ACCESS TO RECORDS

82. Respondent shall retain for at least six (6) years the following documents: (i) complaints concerning user verification, user privacy, contact book use, contact book retention, and non-user privacy, all regardless of the source of the complaint; (ii) copies of all Saturn App advertising, promotional material, and user facing material such as terms of service, privacy

policy, community guidelines, usage guides, FAQs, support pages, and safety centers; and (iii) the documentation required by paragraphs 72 - 81.

83. Such documents shall be made available to the OAG within fourteen (14) days of a written request from the OAG. For avoidance of doubt, this paragraph does not require Respondent to provide the OAG with copies of any draft documents, draft reports, or communications that would otherwise be protected as attorney work product or under the attorney-client privilege.

MONETARY RELIEF

84. Respondent shall pay to the State of New York six hundred and fifty thousand dollars (\$650,000) in penalties and costs (the “Monetary Relief Amount”) as follows:

- a. a payment of two hundred thousand dollars \$200,000 shall be paid in full by March 31, 2025;
- b. a second payment of four hundred and fifty thousand dollars (\$450,000) shall be suspended; provided however, that the suspended amount will be immediately due and payable if the NYAG finds that:
 - i. the financial information submitted to the NYAG contains material misstatements, or
 - ii. Respondent materially breaches this Assurance within 10 years of the date it is executed by the OAG; provided that, should Respondent become a wholly owned subsidiary of another entity, or be otherwise integrated into another entity as a result of a sale or other disposition of all or substantially all of Respondent’s assets to such entity, Respondent may trigger a one year accelerated expiration period for this subparagraph ii upon OAG receipt of (a) a certification of compliance as

detailed in paragraph 86, (b) a compliance report describing in detail Respondent's compliance with this AOD, and (c) all documentation necessary for the OAG to verify such compliance.

85. Payments shall be made by wire transfer in accordance with instructions provided by a NYAG representative and shall reference Assurance No. 24-088.

COMPLIANCE CERTIFICATION

86. The Respondent shall provide OAG with a certification affirming its compliance with the requirements set forth in this Assurance, paragraphs 72- 85, to be submitted to OAG within one hundred and eighty (180) days of the effective date of this Assurance. This certification shall be in writing and be signed by the Chief Executive Officer or President of Respondent, or such other officer (regardless of title) that is designated in Respondent's bylaws or by resolution of the Board of Directors as having the duties of the principal executive officer of Respondent. Thereafter, a certification of compliance shall be submitted to OAG on an annual basis for the following five (5) years.

87. For the five (5) years following execution of this Assurance, Respondent shall deliver a copy of this Assurance to (a) all current and future principals, officers, directors, and managers; (b) all current and future employees, agents, and representatives having supervisory responsibilities relating to the subject matter of this Assurance; and (c) any business entity resulting from any change in structure. Respondent shall first deliver this order to the personnel identified above within thirty (30) days of the execution of this Agreement.

MISCELLANEOUS

88. Respondent expressly agrees and acknowledges that OAG may initiate a subsequent investigation, civil action, or proceeding to enforce this Assurance, for violations of

the Assurance, or if the Assurance is voided pursuant to paragraph 95, and agrees and acknowledges that in such event:

- a. any statute of limitations or other time-related defenses are tolled from and after the effective date of this Assurance;
- b. the OAG may use statements, documents, or other materials produced or provided by Respondent prior to or after the effective date of this Assurance;
- c. any civil action or proceeding must be adjudicated by the courts of the State of New York, and that Respondent irrevocably and unconditionally waives any objection based upon personal jurisdiction, inconvenient forum, or venue; and
- d. evidence of a violation of this Assurance shall constitute prima facie proof of a violation of the applicable law pursuant to Executive Law § 63(15).

89. If a court of competent jurisdiction determines that Respondent has violated the Assurance, Respondent shall pay to the OAG the reasonable cost, if any, of obtaining such determination and of enforcing this Assurance, including without limitation legal fees, expenses, and court costs.

90. This Assurance is not intended for use by any third party in any other proceeding.

91. All terms and conditions of this Assurance shall continue in full force and effect on any successor, assignee, or transferee of Respondent. Respondent shall include any such successor, assignment, or transfer agreement a provision that binds the successor, assignee, or transferee to the terms of the Assurance. No party may assign, delegate, or otherwise transfer any of its rights or obligations under this Assurance without the prior written consent of OAG.

92. Nothing contained herein shall be construed as to deprive any person of any private right under the law.

93. Any failure by the OAG to insist upon the strict performance by Respondent of any of the provisions of this Assurance shall not be deemed a waiver of any of the provisions hereof, and the OAG, notwithstanding that failure, shall have the right thereafter to insist upon the strict performance of any and all of the provisions of this Assurance to be performed by Respondent.

94. All notices, reports, requests, and other communications pursuant to this Assurance must reference Assurance No. 24-088, and shall be in writing and shall, unless expressly provided otherwise herein, be given by hand delivery; express courier; or electronic mail at an address designated in writing by the recipient, followed by postage prepaid mail, and shall be addressed as follows:

If to Respondent, to:

Dylan Diamond
Chief Executive Officer
Saturn Technologies Inc.
1 Liberty Street
3rd Floor
New York, NY 10006

If to OAG, to:

Bureau Chief
Bureau of Internet & Technology
NYS Office of the Attorney General
28 Liberty Street
New York, NY 10005

95. OAG has agreed to the terms of this Assurance based on, among other things, the representations made to OAG by Respondent and its counsel and OAG's own factual investigation as set forth in OAG's Findings, paragraphs 1 - 69 above. Respondent represents

and warrants that neither it nor its counsel has made any material representations to OAG that are inaccurate or misleading. If any material representations by Respondent or its counsel are later found to be inaccurate or misleading, this Assurance voidable by OAG in its sole discretion.

96. No representation, inducement, promise, understanding, condition, or warranty not set forth in this Assurance has been made to or relied upon by Respondent in agreeing to this Assurance.

97. Respondent represents and warrants, through the signature below, that the terms and conditions of this Assurance are duly approved. Respondent further represents and warrants that Dylan Diamond, as the signatory to this Assurance, is a duly authorized officer acting at the direction of the Board of Directors of Saturn Technologies.

98. Respondent agrees not to take any action or to make or permit to be made any public statement denying, directly or indirectly, any finding in the Assurance or creating the impression that the Assurance is without legal or factual basis. Nothing in this paragraph affects Respondent's right to take legal or factual positions in defense of litigation or other legal proceedings to which the OAG is not a party.

99. Nothing contained herein shall be construed to limit the remedies available to OAG in the event that Respondent violates the Assurance after its effective date.

100. This Assurance may not be amended except by an instrument in writing signed on behalf of the Parties to this Assurance.

101. In the event that any one or more of the provisions contained in this Assurance shall for any reason be held by a court of competent jurisdiction to be invalid, illegal, or unenforceable in any respect, in the sole discretion of OAG, such invalidity, illegality, or unenforceability shall not affect any other provision of this Assurance.

102. Respondent acknowledges that it has entered this Assurance freely and voluntarily and upon due deliberation with the advice of counsel.

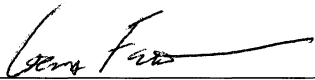
103. This Assurance shall be governed by the laws of the State of New York without regard to any conflict of laws principles.

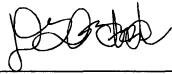
104. The Assurance and all its terms shall be construed as if mutually drafted with no presumption of any type against any party that may be found to have been the drafter.

105. This Assurance may be executed in multiple counterparts by the Parties hereto. All counterparts so executed shall constitute one agreement binding upon all Parties, notwithstanding that all Parties are not signatories to the original or the same counterpart. Each counterpart shall be deemed an original to this Assurance, all of which shall constitute one agreement to be valid as of the effective date of this Assurance. For purposes of this Assurance, copies of signatures shall be treated the same as originals. Documents executed, scanned, and transmitted electronically and electronic signatures shall be deemed original signatures for purposes of this Assurance and all matters related thereto, with such scanned and electronic signatures having the same legal effect as original signatures.

LETITIA JAMES
Attorney General of the State of New York
28 Liberty Street
New York, NY 10005

SATURN TECHNOLOGIES INC.
1 Liberty Street
3rd Floor
New York, NY 10006

By: 
Gena Feist
Assistant Attorney General
Bureau of Internet & Technology

By: 
Dylan Diamond
Chief Executive Officer

Date: 3/5/25

Date: 3/5/25