

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
Division of Law  
124 Halsey Street, Fifth Floor  
P.O. Box 45029  
Newark, New Jersey 07101  
Attorney for Plaintiffs

By: Kashif T. Chand (Bar No. 016752008)  
Chief, Deputy Attorney General  
(609) 433-4473

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION, ESSEX COUNTY  
DOCKET NO. \_\_\_\_\_

MATTHEW J. PLATKIN, Attorney General of  
the State of New Jersey, and CARI FAIS,  
Acting Director of the New Jersey Division of  
Consumer Affairs,

Plaintiffs,

v.

TIKTOK INC.; TIKTOK U.S. DATA  
SECURITY INC.; TIKTOK LLC; TIKTOK  
PTE. LTD.; TIKTOK, LTD.; BYTEDANCE  
INC.; BYTEDANCE LTD XYZ  
CORPORATIONS 1-20; and JANE AND  
JOHN DOES 1-20, individually and as owners,  
officers, directors, shareholders, founders,  
members, managers, employees, servants,  
agents, representatives and/or independent  
contractors of TIKTOK INC., TIKTOK U.S.  
DATA SECURITY INC., TIKTOK LLC,  
TIKTOK PTE. LTD., TIKTOK, LTD.,  
BYTEDANCE INC., and BYTEDANCE LTD.;  
and XYZ CORPORATIONS 1-20,

Defendants.

Civil Action

**COMPLAINT**

Plaintiffs Matthew J. Platkin, Attorney General of the State of New Jersey (“Attorney General”), with offices located at 124 Halsey Street, Fifth Floor, Newark, New Jersey, and Cari Fais, Acting Director of the New Jersey Division of Consumer Affairs (“Director”) (collectively, “Plaintiffs”), with offices located at 124 Halsey Street, Seventh Floor, Newark, New Jersey, by way of Complaint, brought against TikTok Inc., along with its parent and affiliate entities, TikTok U.S. Data Security Inc., TikTok LLC, TikTok Pte. Ltd., TikTok Ltd., ByteDance Inc., and ByteDance Ltd. (collectively, “Defendants” or “TikTok”), state:

### **PRELIMINARY STATEMENT**

1. American teenagers are in the midst of a profound mental health crisis driven by excessive social media use, but it is not accidental. TikTok has designed a widely used social media platform (“Platform”) that targets youth, manipulates them into habitual use, and mines the data produced by their excessive and compulsive use for more and more profit. As a result, TikTok is disrupting sleep, school, and socialization—leading to devastating consequences for youth. Rather than adjust algorithms or remove features like infinite scroll, TikTok downplays and denies the consequences of its choices and hides behind tools and guidelines [REDACTED] [REDACTED] TikTok’s coercive tactics, deceptive representations, and continued concealment of the Platform’s harms violate basic principles of consumer protection law and, unless enjoined, will continue to endanger young users in New Jersey.

2. [REDACTED] [REDACTED] Adolescence, and the years following, prompt physical and social changes that are often marked by intense emotions and an undeveloped ability to judge and reason. For TikTok, these very vulnerabilities are what make young users ideal. With a business model that depends on maximizing advertisement revenue, TikTok sees young users’ reduced ability to self-regulate and increased sensitivity to social rewards, such as “Likes,” as profit opportunities. TikTok has

built algorithms, deployed dark patterns, and adopted features like beauty-enhancing filters, Autoplay, and push notifications to prompt youth to need more and more “reward” stimuli from the Platform. And it’s working. Young users from New Jersey spend over [REDACTED] on TikTok every single day, with usage peaking in the [REDACTED]

3. Excessive, compulsive, and habitual use of the Platform hurts young users. The artificial stimulation interferes with a crucial period of their social development, impacting key developmental tasks like friendship formation. Beyond the negative impacts on socialization, teens report—and research confirms—increased levels of depression, anxiety, self-harm, suicidal ideation, sleep deprivation, and eating disorders due to social media use. The disruption to sleep is especially pronounced, leading to emotional dysregulation, heightened suicide risk, and much more.

4. For years, TikTok [REDACTED] is harming young users. That’s why TikTok’s China-based version of the Platform—known as Douyin (抖音)—limits which hours in the day young users can access it and for how long. Chinese youth are required to wait through a five-second pause between videos when they spend too much time on Douyin. Some are limited to 40 minutes of use per day. [REDACTED]

[REDACTED]

[REDACTED]

5. TikTok has, and continues to, mislead the public about the ways its Platform has harmed and continues to harm young users in New Jersey. Publicly, TikTok touts its Community Guidelines as creating “a welcoming, safe, and entertaining experience.” But TikTok does not tell users, their parents, or their guardians that it has deployed features intended to promote compulsive and habitual use by preying on [REDACTED] And although TikTok’s

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED] Publicly, TikTok promotes these tools as examples of how it is improving young users' experience, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. By luring young users from New Jersey into using and staying on its harmful Platform, [REDACTED] and promoting tools to purportedly protect young users [REDACTED] all while touting its Platform as safe for young users, TikTok has engaged in unconscionable, abusive, and deceptive business practices, provided false and misleading statements, and made knowing omissions, in violation of the New Jersey Consumer Fraud Act ("CFA"), N.J.S.A. 56:8-1 to -229. Unless permanently enjoined and held to account for this conduct, the health of young users in New Jersey will remain in crisis.

**PARTIES AND JURISDICTION**

8. The Attorney General is charged with the responsibility of enforcing the CFA and the regulations promulgated thereunder. N.J.S.A. 52:17B-5.7. The Director is charged with the responsibility of administering the CFA on behalf of the Attorney General. N.J.S.A. 52:17B-120; N.J.S.A. 52:17B-124.

9. Defendant TikTok Inc. is a California corporation with its principal place of business at 5800 Bristol Parkway, Culver City, California 90230.

10. Defendant TikTok U.S. Data Security Inc. is a Delaware corporation with its principal place of business at 5800 Bristol Parkway, Suite 100, Culver City, California 90230. Defendant TikTok, Inc., wholly owns Defendant TikTok U.S. Data Security Inc.

11. Defendant TikTok LLC is a Delaware limited liability company with its principal place of business at 5800 Bristol Parkway, Culver City, California 90230. Defendant TikTok LLC wholly owns Defendant TikTok Inc.

12. Defendant TikTok Pte. Ltd. is a company incorporated in Singapore with its Principal Place of business in Singapore at 1, Raffles Quay, #26-10, Singapore, 048583. Defendant TikTok, Ltd., wholly owns Defendant TikTok Pte. Ltd.

13. Defendant TikTok, Ltd. is a company incorporated in the Cayman Islands with its principal place of business in Shanghai, China. Defendant TikTok, Ltd. wholly owns Defendant TikTok LLC and Defendant TikTok Pte. Ltd.

14. Defendant ByteDance Inc. is a Delaware corporation with its principal place of business at 1199 Coleman Avenue, San Jose, California 95110.

15. Defendant ByteDance Ltd. is a company incorporated in the Cayman Islands with its principal place of business in Beijing, China. Defendant ByteDance Ltd. is the parent company that wholly owns all other defendants.

16. XYZ Corporations 1 through 20 are fictitious corporations meant to represent any additional business entities who have been involved in the conduct that gives rise to the Complaint, but are heretofore unknown to Plaintiffs. As these defendants are identified, Plaintiffs shall amend the Complaint to include them.

17. John and Jane Does 1 through 20 are fictitious individuals meant to represent the owners, officers, directors, shareholders, founders, managers, members, employees, servants,

agents, representatives and/or independent contractors of all named and fictitious Defendants who have been involved in the conduct that gives rise to this Complaint, but are heretofore unknown to Plaintiffs. As these defendants are identified, Plaintiffs shall amend the Complaint to include them.

18. This Court has jurisdiction over each Defendant as Defendants have operated as a common enterprise such that agency and/or alter-ego relationships have formed.

19. Jurisdiction is proper because Defendants have transacted business within New Jersey and have engaged in conduct impacting New Jersey consumers at all times relevant to this complaint.

20. Each Defendant markets its services throughout New Jersey and intentionally avails itself of New Jersey markets so as to render the exercise of jurisdiction fair, reasonable, and consistent with traditional notions of fair play and substantial justice.

21. Venue is proper in Essex County pursuant to R. 4:3-2, because Defendants conduct business in this county.

#### **GENERAL ALLEGATIONS TO ALL COUNTS**

**A. TikTok Entered the U.S. Market and Experienced Explosive Growth Following its Acquisition of Musical.ly**

22. In September 2016, TikTok's parent company ByteDance Ltd., acting through a subsidiary, released its first social media platform, Douyin, in China. The Douyin platform allows users to create and post short videos and watch videos uploaded by other users.

23. ByteDance Ltd. entered the American market in December 2017 by acquiring Musical.ly, a popular social media app launched in 2014 that allowed users to create and post short-form videos of themselves lip-syncing and dancing to popular songs.

24. Musical.ly was particularly popular with American teens and garnered at least 60 million users, most of whom were in the United States. A significant percentage of Musical.ly

users were children under the age of thirteen. At the time of purchase, ByteDance Ltd. paid approximately \$1 billion to acquire Musical.ly and the accounts and content of its millions of users.

25. When registering for Musical.ly before 2017, users submitted their email address, phone number, username, first and last name, a short biography, and a profile picture. Musical.ly did not require users to enter their age when creating an account nor did it request age information for existing users. “A significant percentage of Musical.ly users [were] children under thirteen, and numerous press articles between 2016 and 2018 highlight the popularity of the App among tweens and younger children.”<sup>1</sup> Between December 2015 and October 2016 Musical.ly also collected geolocation information from users of the app. All of this information was transferred to ByteDance as part of the purchase and sale of Musical.ly. ByteDance bought Music.ly to take advantage of Music.ly’s millions of young users in the United States.

26. In August 2018, ByteDance Ltd. merged the Musical.ly app with the TikTok Platform under the TikTok name and began operating as TikTok.

27. Shortly thereafter in February 2019, Musical.ly—which, by that time, was known and operating as TikTok—paid the FTC \$5.7 million to settle allegations that Musical.ly violated federal law by illegally collecting and using personal information from children without parental consent.

28. Those violations fueled TikTok’s growth and immense popularity. The lack of age verification made it easier for children under thirteen to sign up, consume content, and create content on TikTok, which hooked existing users and attracted new users to the Platform.

29. In March 2019, the month after its FTC settlement, TikTok bifurcated its Platform into [REDACTED] (also known as “TikTok For Younger Users”, which is intended for use by

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<sup>1</sup> Complaint ¶¶ 12–23, *United States v. Musical.ly, et al.*, No. 2:19-cv-1439 (C.D. Cal. Feb. 27, 2019) (hereinafter Musical.ly Complaint).

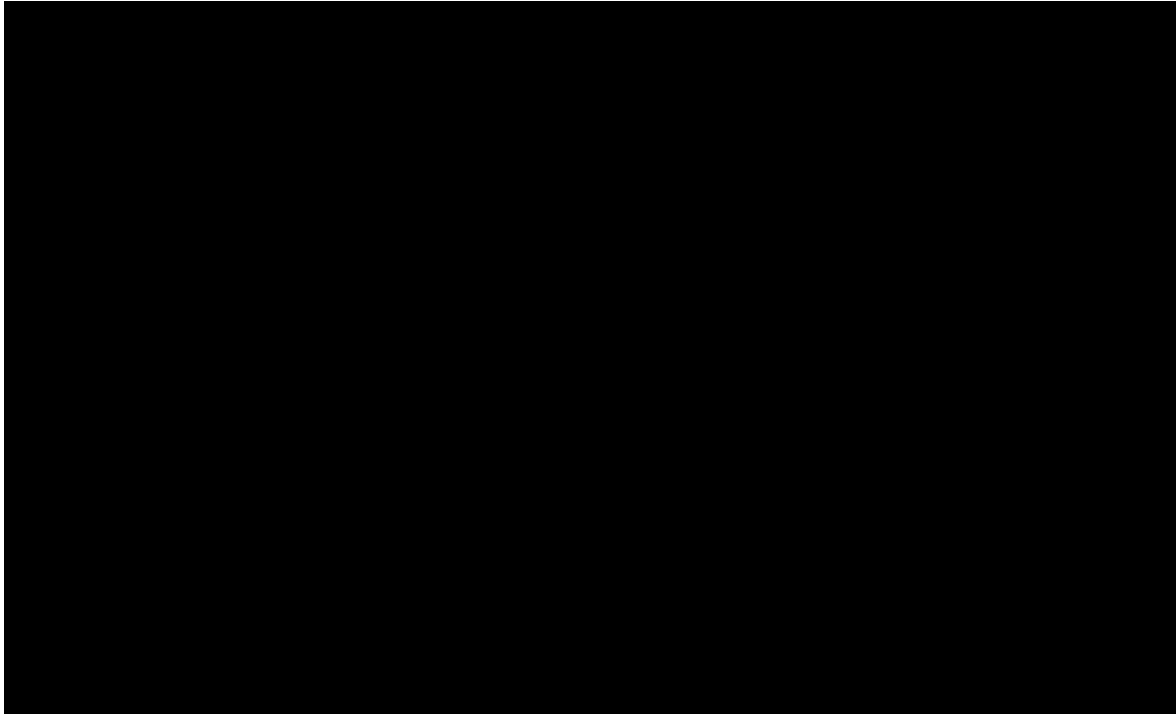
children who report their age as under thirteen) and what TikTok calls the [REDACTED] or [REDACTED] [REDACTED] (the standard version of TikTok, available to everyone who reports their age as thirteen or older). [REDACTED] is a TikTok experience for [REDACTED] featuring [REDACTED] [REDACTED] as well as other restrictions.

30. Notwithstanding the FTC settlement and TikTok's launch of [REDACTED] TikTok remains highly incentivized to keep young people on the Platform. An internal review [REDACTED] [REDACTED] According to internal data from 2019, [REDACTED] [REDACTED] One TikTok 2019 internal presentation states [REDACTED] [REDACTED] As evidenced by [REDACTED] TikTok considers users [REDACTED] [REDACTED] as a critical demographic [REDACTED] [REDACTED]

31. With a relentless focus on young people, TikTok's growth in the United States exploded. Through at least 2020, the Platform's user growth in the United States was [REDACTED] [REDACTED]

32. TikTok's internal data [REDACTED] [REDACTED]





33. A 2021 survey found that 88% of teenagers in the U.S. between thirteen and eighteen have their own smartphone, and 57% of children between eight and twelve have their own tablet.<sup>2</sup>

34. In 2023, 63% of all Americans aged thirteen to seventeen who responded to a Pew Research survey reported using TikTok, and many teenagers in the U.S. were using TikTok daily. 17% of American teens said that they were on TikTok “almost constantly.”

35. TikTok’s impact upon New Jersey users, including young users, is substantial. [REDACTED]  
[REDACTED]  
[REDACTED] Daily  
usage is also significant. [REDACTED]  
[REDACTED]

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<sup>2</sup> See Fed. Trade Comm’n, *A Look Behind the Screens: Examining the Data Practices of Social Media and Video Streaming Services* (Sept. 2024), [https://www.ftc.gov/system/files/ftc\\_gov/pdf/Social-Media-6b-Report-9-11-2024.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/Social-Media-6b-Report-9-11-2024.pdf) [[https://web.archive.org/web/20240928021549/https://www.ftc.gov/system/files/ftc\\_gov/pdf/Social-Media-6b-Report-9-11-2024.pdf](https://web.archive.org/web/20240928021549/https://www.ftc.gov/system/files/ftc_gov/pdf/Social-Media-6b-Report-9-11-2024.pdf)].

**B. Defendants Jointly Operate TikTok as a Common Enterprise**

36. Defendants, although facially separate on paper, are all intimately involved in operating the TikTok Platform. For example, ByteDance Ltd. and TikTok Ltd. make decisions about the Platform, even though TikTok is unavailable in China. ByteDance Ltd. and TikTok Ltd. even retain authority to approve or deny implementation of TikTok’s “safety features.”

37. Although TikTok Inc. is incorporated in the United States, it is led by a multi-national executive team based in the United States, Singapore, and China. ByteDance Ltd. and TikTok Inc. executives, including Zhang Yiming, Liang Rubo, Zhao Penyuan, and Zhu Wenjia, direct and control TikTok’s core features and development.

38. Moreover, Defendants operated on a “shared services” model in which ByteDance Ltd. provides legal, safety, and privacy recourses, including personnel.

39. As part of Defendants’ shared services model, ByteDance Ltd. controls legal compliance and oversight at TikTok Inc. ByteDance Ltd.’s Global General Counsel, who reports to ByteDance Ltd.’s CEO, also oversees TikTok Inc.’s legal matters.

40. Similarly, ByteDance Ltd. controls TikTok Inc.’s e-commerce operations, and leadership of TikTok Inc.’s e-commerce operations reports directly to ByteDance Ltd.’s executives rather than TikTok Inc.’s own CEO. Further, TikTok Inc.’s head of human resources reports to ByteDance Ltd.’s head of human resources.

41. Additionally, upon information and belief, Defendants have one centralized bank account for ByteDance Ltd.’s more than a dozen products, including TikTok.

42. ByteDance Ltd. also created the TikTok algorithm and maintains ownership over it.

43. Employee roles among Defendants are often blurred: TikTok Inc. represents that it has not created or maintained an organizational chart because its employees do not have formal

titles and the responsibilities between organizations are fluid. Some former employees have even stated they were unsure which Defendant they actually worked for.

44. Because Defendants’ corporate boundaries are porous, employees at all the companies work together. All Defendants’ employees use a shared internal messaging system, Lark, where they can engage in chats and group chats with each other regardless of their formal company affiliation. Defendants’ employees use Lark to discuss specific features on TikTok.

45. According to a 2023 report prepared for the Australian Select Committee on Foreign Interference through Social Media, one ByteDance Ltd. insider described TikTok Inc. as “not developed enough to be a self-contained business unit. Therefore . . . TikTok draws on personnel, experience, and methods of ByteDance’s Douyin app, software, and commercial model to achieve ‘technology accumulation and business breakthroughs.’”<sup>3</sup>

46. This report also gives examples of cross-hiring among Defendants. For example, in November 2022, both ByteDance Inc. and TikTok Inc. posted job advertisements for a “data scientist” based in Shanghai. Both job advertisements provided the same job description. And both job advertisements came from the same hiring team, which was based within TikTok.<sup>4</sup>

47. The report concluded that ByteDance Ltd. management considers the entities interchangeable.

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<sup>3</sup> Rachel Lee *et al.*, *TikTok, ByteDance, and Their Ties to the Chinese Communist Party*, 42 (March 14, 2023), <https://www.scribd.com/document/633015202/TikTok-ByteDance-And-Their-Ties-to-the-Chinese-Communist-Party>.

<sup>4</sup> *Id.*; see also *数据科学家-国际短视频-上海*, ByteDance via LinkedIn, <https://web.archive.org/web/20230227050201/https://cn.linkedin.com/jobs/view/%E6%95%B0%E6%8D%AE%E7%A7%91%E5%AD%A6%E5%AE%B6-%E5%9B%BD%E9%99%85%E7%9F%AD%E8%A7%86%E9%A2%91-%E4%B8%8A%E6%B5%B7-at-%E5%AD%97%E8%8A%82%E8%B7%B3%E5%8A%A8-3362902087> (last accessed May 30, 2024); *Data Scientist/数据科学家*, TikTok via LinkedIn, <https://web.archive.org/web/20240330075157/https://www.linkedin.com/jobs/view/datascientist-%E6%95%B0%E6%8D%AE%E7%A7%91%E5%AD%A6%E5%AE%B6-at-tiktok-3345866583/?originalSubdomain=cn> (last accessed May 30, 2024).

48. Prominent leaders of TikTok Inc. even state on their public LinkedIn profiles that they are employed by “ByteDance/TikTok.”<sup>5</sup>

49. TikTok Inc. CEO Shou Zi Chew, who is also paid by ByteDance Ltd., stated to Congress on March 23, 2023, that employees of ByteDance Ltd. work on the TikTok platform and that he personally uses Lark to communicate “with employees at ByteDance [Ltd.]”<sup>6</sup>

50. TikTok CEO Shou Zi Chew reports to the CEO of ByteDance Ltd.

51. ByteDance Ltd. and TikTok Ltd. are intimately involved in making decisions about the TikTok platform, even though TikTok is unavailable in China. ByteDance Ltd. and TikTok Ltd. even retain authority to approve or deny implementation of TikTok’s “safety features.”

52. [REDACTED]

53. Further, TikTok Ltd. is listed as the TikTok Platform’s developer, and TikTok Pte. Ltd. as the TikTok Platform’s seller, on Apple’s App Store (“App Store”). Similarly, the TikTok Platform’s listing on Google’s Google Play software distribution platform (“Google Play”) provides TikTok Pte. Ltd. as the entity responsible for the app.

54. This level of control, direction, and involvement from ByteDance Ltd. is important and material to this Complaint. There are well-known and reported risks concerning ByteDance’s

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<sup>5</sup> See *id.*

<sup>6</sup> *TikTok: How Congress Can Safeguard American Data Privacy and Protect Children from Online Harms Before H. Comm. on Energy and Commerce*, 118th Cong. 28, 36, 96 (2023) (statement of Shou Zi Chew, Chief Executive Officer, TikTok Inc.).

control over TikTok and its proprietary algorithm. The U.S. government and intelligence community have recognized that “ByteDance and TikTok pose a threat to national security[,]” because China may coerce ByteDance and TikTok to “[c]overtly manipulate its recommendation algorithm to shape the information received by millions of Americans.”<sup>7</sup> The U.S. government has also found that China may coerce ByteDance to “[p]rovide the [Chinese government] access to sensitive and personally identifying U.S. user data collected by the TikTok application.”<sup>8</sup>

55. These risks are not hypothetical. An [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

56. In effect, this leaves New Jersey’s youth especially vulnerable to risky data collection practices, misinformation, propaganda, and other forms of psychological manipulation through TikTok’s recommendation algorithms.

57. At all relevant times, each Defendant acted individually and jointly with every other named Defendant in committing all acts alleged in this Complaint.

58. At all relevant times, each Defendant acted: (a) as a principal; (b) under express or implied agency; and/or (c) with actual or ostensible authority to perform the acts alleged in this Complaint on behalf of every other named Defendant.

59. At all relevant times, some or all Defendants acted as the agent of the others, and all Defendants acted within the scope of their agency if acting as an agent of another.

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<sup>7</sup> Declaration of Case Blackburn, Assistant Director of National Intelligence, Office of the Director of National Intelligence ¶ 9, <https://www.documentcloud.org/documents/25017864-72624-doj-response-to-tiktok-lawsuit>. (last visited Oct. 4, 2024).

<sup>8</sup> *Id.*

60. At all relevant times, each Defendant acted in concert to engage in or planned to engage in the violations of law alleged in this Complaint. Each Defendant facilitated the commission of those unlawful acts and intended to and did encourage, facilitate, or assist in the commission of the unlawful acts, and thereby aided and abetted the other Defendants in the unlawful conduct.

61. Defendants have engaged in a conspiracy, common enterprise, and common course of conduct, the purpose of which is and was to engage in and profit from the violations of law alleged in this Complaint. The conspiracy, common enterprise, and common course of conduct continue to the present.

### **C. How TikTok Monetizes the Platform**

62. TikTok's business model is based on both expanding the number of users, including young users, on the Platform, and then maximizing their engagement with the Platform, to increase revenue through the sale of advertising. TikTok's Platform is accessible via its website at [www.tiktok.com](http://www.tiktok.com) and its application available for download through the App Store or Google Play.

63. Over the years, TikTok has entered (and continues to enter) into contracts with [REDACTED] of New Jersey residents, many of whom are under the age of eighteen, to provide them with access to social media services in New Jersey in exchange for their valuable data. This includes [REDACTED]

64. To increase its user base, TikTok purports to offer its Platform to New Jersey consumers without an upfront cost. But what users do not pay upfront, they more than pay for through their data.

65. To use the Platform, users must agree to TikTok's Terms of Service. TikTok's Terms of Service, provides in relevant part: "[y]ou acknowledge and agree that [TikTok] may



indicia that includes [REDACTED]

[REDACTED]

[REDACTED]

70. TikTok monetizes the data it collects to offer third-party businesses the opportunity to advertise to specific demographics of users. TikTok provides businesses various tools to use this data through its Business Center, Ad Manager, Creator Marketplace, Business Account, and TikTok. TikTok also provides tools that allow advertisers to tailor messages and ads to specific locations, including New Jersey.

71. TikTok admits that [REDACTED]

[REDACTED]

[REDACTED]

72. In 2020, Global Action Plan estimated that some young users may see as many as 1,260 advertisements per day. This estimate does not even account for influencer content and advertisements embedded or blended into the surrounding content.<sup>12</sup>

73. TikTok also uses overt methods to encourage e-commerce on the Platform. TikTok provides tools for users to engage in commercial transactions on the Platform and encourages users to make purchases directly “in-app,” rather than following links to online stores off the app.

74. TikTok directly profits from New Jersey consumers by taking significant commission on “in-app” e-commerce transactions. The “TikTok Shop” allows small businesses and global brands alike to advertise and sell goods, which New Jersey users can purchase directly through the Platform. TikTok also offers advertising with Shopify, an e-commerce platform, that targets New Jersey consumers to buy products while on the Platform.

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<sup>12</sup> See Fed. Trade Comm’n, *supra* at note 2.



75. New Jersey consumers may also purchase “Coins” from TikTok and gift them to other TikTok users, which can then be exchanged for U.S. fiat currency. Coins on TikTok are generally worth one cent each and can be purchased in bundles.

76. Charging service fees on e-commerce transactions occurring on the Platform, including on transactions involving New Jersey consumers, has proven especially lucrative. Between 2018 and 2023, [REDACTED]

[REDACTED] These service fees directly relate to the Complaint’s allegations: TikTok’s addictive design and deceptive practices encourage more New Jersey youth to spend more time on the Platform, leading to increased ad views, e-commerce activity, and more service fees for TikTok. TikTok knows that young users are especially critical to TikTok’s business. They are highly connected to the Internet, more likely to have social media accounts, and more likely to spend their free time on the Platform. A report commissioned by TikTok to assess the value of its Platform found that TikTok is “[u]ndeniably powerful at reaching younger audiences.”<sup>13</sup>

77. TikTok also offers New Jersey consumers “TikTok Rewards,” a referral rewards program that can similarly be redeemed for U.S. currency. Users may earn a referral reward when they invite a new user who creates a TikTok account. Subsequently, both the new and referring users may earn referral rewards when the new user participates in certain video-watching tasks.

78. TikTok also features New Jersey consumers and events in its advertisements for the Platform, and compensates these consumers for appearing in the advertisements.

79. Combining these strategies into a business model focused on driving user numbers and engagement has been extremely profitable for TikTok. TikTok has been described as an “ads juggernaut” by news outlets noting TikTok’s rise.

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<sup>13</sup> *The Power of TikTok: Achieving breakthrough brand building with TikTok*, Kanter |TikTok, <https://www.tiktok.com/business/library/the-power-of-tiktok.pdf> (last visited June 6, 2024).

80. TikTok’s success largely comes from the significant amount of time users spend on the Platform. Public reporting found that TikTok’s users spend an average of 96 minutes per day on the app.

81. TikTok’s internal documents [REDACTED]  
[REDACTED]  
[REDACTED]

82. Interviews of TikTok employees [REDACTED]  
[REDACTED]. For example, [REDACTED]  
[REDACTED]

[REDACTED] An internal document also [REDACTED]  
[REDACTED]

83. [REDACTED] from “TikTank,” an internal TikTok research group, [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

84. TikTok has thus designed a business model that incentivizes increased user engagement, with young users as its primary target in part because they become a pipeline of life-long users. [REDACTED]  
[REDACTED]  
[REDACTED]

**D. TikTok Maximizes the Time that Young American Users Spend on the Platform**

85. To drive growth and revenue in the United States, TikTok strategically designs and deploys exploitative and manipulative features to coerce young users into maximizing their time on its Platform. This is not an accidental byproduct of its efforts to grow its base of young users and increase its advertising revenues. Rather, coercing young users to maximize time on its Platform is a central pillar in its growth strategy—and one that TikTok has doggedly pursued notwithstanding the harm caused to those young users.

86. TikTok’s executives and employees admit they target young Americans, stating:

- “It’s better to have young people as an early adopter, especially the teenagers in the U.S. Why? They [*sic*] got a lot of time.”<sup>14</sup>
- “Teenagers in the U.S. are a golden audience... If you look at China, the teenage culture doesn’t exist—the teens are super busy in school studying for tests, so they don’t have the time and luxury to play social media apps.”<sup>15</sup>

87. TikTok also [REDACTED]

American teens. Its executives admit:

- [REDACTED]
  - [REDACTED]
- [REDACTED]
- [REDACTED]

<sup>14</sup> Andrew Brown, *Musical.ly’s Alex Zhu on Igniting Viral Growth and Building a User Community 2016* at 5:01, YouTube (Feb. 17, 2022), <https://www.youtube.com/watch?v=b7y971yL5dE> [<https://web.archive.org/web/20240918213502/https://www.youtube.com/watch?v=b7y971yL5dE>].

<sup>15</sup> Paul Mozur, *Chinese Tech Firms Forced to Choose Market: Home or Everywhere Else*, N.Y. Times (Aug. 9, 2016), [https://www.nytimes.com/2016/08/10/technology/china-homegrown-internet-companies-rest-of-the-world.html?\\_r=0](https://www.nytimes.com/2016/08/10/technology/china-homegrown-internet-companies-rest-of-the-world.html?_r=0) [[https://web.archive.org/web/20230716193659/https://www.nytimes.com/2016/08/10/technology/china-homegrown-internet-companies-rest-of-the-world.html?\\_r=0](https://web.archive.org/web/20230716193659/https://www.nytimes.com/2016/08/10/technology/china-homegrown-internet-companies-rest-of-the-world.html?_r=0)].

[REDACTED]

88. Internal TikTok documents note that young users: [REDACTED]

[REDACTED]

and (3) that they [REDACTED]

[REDACTED]

89. TikTok conducts [REDACTED]. It found that [REDACTED]

[REDACTED]

[REDACTED]

90. TikTok optimizes its Platform for maximum use by young people. It tracks metrics to measure its success, such as: [REDACTED]

[REDACTED]

[REDACTED] TikTok uses this information to [REDACTED]

[REDACTED]

91. TikTok also targets American children under the age of thirteen with the [REDACTED] version, also known as the “TikTok for Young Users” version, of the Platform.

92. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

93. [REDACTED] TikTok expressly stated that [REDACTED]

[REDACTED]

[REDACTED]

94. TikTok’s efforts to maximize usage of its Platform by American teenagers and children have succeeded. In 2022, the TikTok app was called the American teens’ “primary social app of choice.”<sup>16</sup> A 2023 Pew Research study found that TikTok was the second most used online platform among U.S. teens, only behind YouTube.<sup>17</sup>

95. [REDACTED] the Platform harms mental health and [REDACTED] [REDACTED] have been stymied by TikTok’s pursuit of profits above all else. For example:

- One internal strategy document suggested [REDACTED]  
[REDACTED]  
[REDACTED]
- TikTok knows that [REDACTED].  
However, TikTok’s own former Global Head of Minor Safety [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
- TikTok employees have gone so far as to admit that: young users are the ideal targets when beginning a social media company; that [REDACTED]  
[REDACTED]; that [REDACTED]  
[REDACTED]; and that [REDACTED]

<sup>16</sup> See Andrew Hutchinson, *New Survey Underlines TikTok’s Popularity with Teen Users*, Soc. Med. Today (Nov. 7, 2022), <https://www.socialmediatoday.com/news/Survey-Underlines-TikToks-Popularity-with-Teens/635961/> [<https://web.archive.org/web/20240414133341/https://www.socialmediatoday.com/news/Survey-Underlines-TikToks-Popularity-with-Teens/635961/>].

<sup>17</sup> Monica Anderson, et al., *Teens, Social Media and Technology 2023*, Pew Research Center (Dec. 11, 2023), <https://www.pewresearch.org/internet/2023/12/11/teens-social-media-and-technology-2023/> [<https://web.archive.org/web/20240928060753/https://www.pewresearch.org/internet/2023/12/11/teens-social-media-and-technology-2023/>].

[REDACTED]

**E. TikTok Employs Numerous Features that Incorporate Reward Mechanisms to Promote Excessive, Compulsive, and Habitual Use of the Platform by Young Users**

96. TikTok created Platform features intended to cause excessive, compulsive, and habitual use, despite awareness that young people are more susceptible to—and acutely harmed by—those features. For young users of the TikTok Platform, these harms are severe, and include increased levels of depression and anxiety disorders, reduced sleep, self-harm, suicidal ideation, and eating disorders.

97. TikTok’s algorithms and design decisions are intended to cause young users to compulsively spend increasing amounts of time on the Platform. TikTok outfitted the Platform with features that its own employees describe as [REDACTED] particularly effective at enticing younger users, who TikTok employees admit [REDACTED]

[REDACTED]

98. TikTok’s design choices exploit the neurotransmitter dopamine, which helps humans feel pleasure as part of the brain’s reward system to encourage reinforcement. Dopamine “rewards” can lead to addictive behavior, particularly when rewards are unpredictable.

99. Unpredictably delivered dopamine hits, known as “variable rewards,” are particularly effective at influencing human behavior. A report about persuasive design called *Disrupted Childhood* ([REDACTED]), and which was co-authored by Alexandra Evans, who subsequently became a lead executive at TikTok on child safety) explained how variable rewards produce dopamine rushes:

Variable rewards . . . hold a special thrill, as the user anticipates a reward that they know could come but is tantalisingly [*sic*] just out of reach. A gambler waiting to see where the roulette wheel will stop or a viewer watching a presenter’s dramatic pause before they

announce a winner; in both cases, the individuals experience a dopamine rush as they anticipate the unknown outcome.<sup>18</sup>

100. The anticipation of the reward, not just the reward itself, drives compulsive and unhealthy habit formation. TikTok is aware that [REDACTED]

101. TikTok intentionally and successfully harnesses this well-researched method to fuel excessive, compulsive, and habitual use of its Platform while knowing that the prospect of an *unpredictable* dopamine “reward” is even more addicting than consistent dopamine “rewards.”<sup>19</sup>

102. To that end, the Platform deploys variable rewards to its users. Some of the manipulatively designed features that deliver these variable dopamine rewards, such as Autoplay, Infinite Scroll, and the recommendation system, are described below.

103. [REDACTED] younger users of the Platform find it especially difficult “to ignore the prospect of a dopamine reward, even when this conflicts with other essential daily activities, such as sleeping or eating.”<sup>20</sup> In fact, [REDACTED]

[REDACTED] A [REDACTED] report found that young developing brains are vulnerable to harmful addictive behaviors:

[I]f adapting to physical changes poses a new set of challenges to the developing young person, the rapid development of the brain brings additional and perhaps greater ones. In healthy development, the Limbic system of the brain (which regulates emotion and feelings of reward) undergoes dramatic changes between [the] ages of 10-12 years. These changes then interact with the pre-frontal

<sup>18</sup> Baroness Kidron, et al., *Disrupted Childhood: The Cost of Persuasive Design*, 24 (April 2023), <https://respect.international/wp-content/uploads/2023/09/DISRUPTED-CHILDHOOD---The-Cost-of-Persuasive-Design.pdf>.

<sup>19</sup> See Stephanie Watson, *Dopamine: The Pathway to Pleasure*, Harv. Med. Sch. (July 20, 2021), <https://www.health.harvard.edu/mind-and-mood/dopamine-the-pathway-to-pleasure> [<https://web.archive.org/web/20240927021907/https://www.health.harvard.edu/mind-and-mood/dopamine-the-pathway-to-pleasure>].

<sup>20</sup> Ben Carter et al., *Association between portable screen-based media device access or use and sleep outcomes*, 170 JAMA PEDIATRICS 12, 1202–08 (2016).

cortex of the brain (the judgement centres) to promote novelty seeking behaviour, risk-taking and interactions with peers. In simple terms, this means there is a phase of intense emotion, whilst judgment can appear to be less acute, as those ‘judgement centres’ of the brain are being revised. . . . [UNICEF] describes early adolescence as a time of rapid learning and brain development, which facilitates increases in sensation-seeking, motivation for social relations and sensitivity to social evaluation[.]<sup>21</sup>

104. As the *Disrupted Childhood* report found, “[c]hildren’s predilection to seek immediate gratification makes them particularly susceptible to habit-forming rewards”<sup>22</sup>—a susceptibility that TikTok exploits for greater profits.

105. The unpredictable dopamine rewards that the TikTok Platform provides—such as “Likes” (received when a user clicks a heart-shaped button on a video); “follows” (a user’s decision to “follow” another user’s account); and “comments” (user comments to posts on the Platform)—are social rewards. TikTok knows from its internal research that [REDACTED]

106. Internal presentations note that [REDACTED]

[REDACTED] One of TikTok’s internal goals in 2020 was to [REDACTED]

<sup>21</sup> Zoe Hilton, et al., *Exploring effective prevention education responses to dangerous online challenges*, (Praesidio Safeguarding, November 2021), <https://praesidiosafeguarding.co.uk/safe-guarding/uploads/2021/11/Exploring-effective-prevention-education-responses-to-dangerous-online-challenges-English-UK-compressed-1.pdf> (last visited on July 17, 2024)

<sup>22</sup> Kidron, *supra* note 18, at 20.



1. TikTok [REDACTED]  
[REDACTED] Excessive, Compulsive, and Habitual Use by Young Users

107. The central feature of the TikTok Platform is its “recommendation system,” which is a complex series of algorithms that powers the “For You” feed. The For You feed provides users with a stream of videos that TikTok’s recommendation system predicts will keep them on the Platform. And it works. One internal document [REDACTED]

[REDACTED] notes, [REDACTED]  
[REDACTED]

108. TikTok’s recommendation system is, in large part, composed of the following:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

109. TikTok’s recommendation system is content-agnostic or, in TikTok’s own words,

[REDACTED] As described in an internal TikTok document, [REDACTED]  
[REDACTED]

[REDACTED] Another internal document, a screenshot of which is below, clearly indicates that [REDACTED]

[REDACTED]. The recommendation system learns from how users respond to what they view on the Platform— [REDACTED]

[REDACTED]—and based on that feedback delivers more videos intended to keep users on the Platform for longer periods. The engineers who designed and implemented the recommendation system programmed it to [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

110. The recommendation system accomplishes this in part by using the information learned from users' responses to induce maximum engagement through the deployment of intermittent variable dopamine rewards—the same psychological mechanism that underlies the addictive nature of slot machines. [REDACTED]

[REDACTED]

111. TikTok employees, including those working on the recommendation system, understand that the three greatest measures of the company's success are: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. In Tandem with the Recommendation System, TikTok Employs Multiple Features that Use Reward Mechanisms to Manipulate Users into Compulsive, Excessive, and Habitual Use

112. TikTok designed manipulative features to increase young users' time spent on the Platform, which—independently and together—create the compulsive, excessive, and habitual use that harms TikTok's young users. Many of TikTok's manipulative features have the substantial effect of subverting or impairing user autonomy, decision-making, and choice—a “dark pattern” for its users. These manipulative features and dark patterns improperly coerce children into increasing their time on the Platform and promoting unhealthy use, regardless of the content.

*i. Effects*

113. TikTok's Platform contains filters, or “Effects,” which allow users to manipulate their appearance in photos and videos. As described in paragraphs 242 through 245, *infra*, these Effects are deeply harmful to young users. The filters contained in Effects incentivize young users to alter their appearance in images and videos in ways that mimic cosmetic surgery or foster unrealistic beauty standards, among other body-dysmorphic impacts that are known to harm self-esteem and induce negative body image.

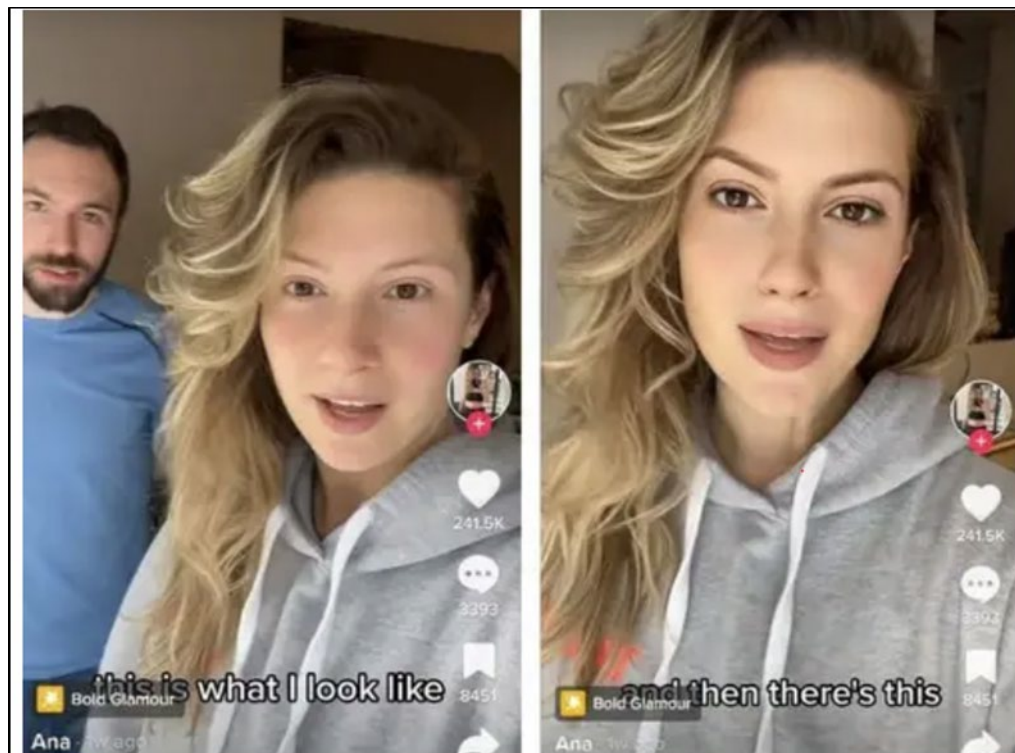
114. One such filter is the “RETOUCH” feature, [REDACTED] TikTok places the RETOUCH feature on the right-hand side of the screen when a user prepares to take video. The RETOUCH feature incorporates machine learning and artificial intelligence to artificially augment (or, in TikTok’s words, perform [REDACTED] on) the appearance of a person who applies the filter.

115. TikTok’s RETOUCH feature allows users to adjust many of their physical attributes to align with the user’s aspirational beauty standards. For example, the feature can change the size and shape of the user’s jaw, nose, lips, and eyebrows, whiten their teeth, smooth their skin, and adjust their skin tone or color. Once selected, TikTok allows RETOUCH to apply to all of the user’s videos.

116. TikTok’s RETOUCH feature and Beautify filters [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] This spurred TikTok to develop enhanced beauty filters.

117. In the spring of 2023, TikTok created and published the “Bold Glamour” filter. This advanced filter, like their RETOUCH feature, is a sophisticated face filter that dramatically alters the user’s image. Like the RETOUCH feature, it is very difficult for viewers to know that an image filter was applied to a video, which may encourage unrealistic comparisons and foster body dysmorphia. TikTok’s Bold Glamour filter changes the user’s image to mimic the effects of makeup and cosmetic surgery. The following before and after photos of the Bold Glamour beauty filter demonstrate its effect:



118. The Bold Glamour Effect has been wildly successful by TikTok’s measures. It has been used in over 224 million posts.

119. TikTok’s internal research [REDACTED] that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

120. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

121. Besides Bold Glamour, TikTok designs, produces, and provides other filters, some of which are stock filters and others that are customizable. TikTok places these filters on its “EffectHouse” tool, which allows users to build augmented reality experiences and effects.

122. TikTok pays individuals who customize TikTok’s filters in EffectHouse \$700 if their product is used in 500,000 unique videos within the first 90 days of its release and \$140 for every additional 100,000 unique uses.

123. Filters, including TikTok’s RETOUCH tool, are so integrated into the TikTok Platform that, [REDACTED] [REDACTED] subverting or impairing user autonomy, decision-making and choice. [REDACTED]

[REDACTED] In response, the Dove personal care brand launched a campaign in 2023 for users to #TurnYourBack on the Bold Glamour filter, citing studies that 52% of girls said they use image filters every day, and 80% used a social media platform to change their appearance before the age of thirteen.

124. The press reported how the automatic application of beauty filters drew striking criticism from concerned parties who claimed these changes had significant impacts on the mental health and well-being of TikTok’s users.

125. One study has shown that even users reporting a higher initial level of self-esteem felt they looked 44% worse before their image was edited using a filter. In a follow-up survey, “when the AR [augmented reality] filter increased the gap between how participants wanted to

look and how they felt they actually looked, it reduced their self-compassion and tolerance for their own physical flaws.”<sup>23</sup>

126. TikTok [REDACTED] to users. A TikTok employee [REDACTED]

[REDACTED]

127. TikTok’s internal documents report [REDACTED]

[REDACTED]

128. As noted above, Effects, including beautifying Effects, increase engagement and drive overuse. Even though Effects are harmful, TikTok continues to deploy them since beauty filters ultimately benefit TikTok financially by keeping young users on the Platform.

129. Because TikTok knows these Effects features [REDACTED] of the Platform, particularly [REDACTED] it retains these features [REDACTED]

Indeed, [REDACTED]

[REDACTED]

130. TikTok’s decision to design and deploy these beauty filters, especially in combination with other manipulatively-designed TikTok product features, has caused harm to young users by perpetuating body image issues and certain beauty stereotypes, such as structural facial features and skin color, that favor Caucasian or European features; eating disorders; body dysmorphia; and related problems.

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<sup>23</sup> Ana Javornik, et al., *Research: How AR Filters Impact People’s Self-Image*, Harv. Bus. Rev. (Dec. 22, 2021), <https://hbr.org/2021/12/research-how-ar-filters-impact-peoples-self-image> [<https://web.archive.org/web/20240927043449/https://hbr.org/2021/12/research-how-ar-filters-impact-peoples-self-image> ].

*ii. Autoplay*

131. When a user launches the TikTok Platform, a video automatically begins to play in the user's For You feed. This dark-pattern feature called "Autoplay" is designed to immediately grab the user's attention and immerse them into the Platform. TikTok internally [REDACTED] [REDACTED] To manipulate users into compulsively spending more time on the Platform, TikTok does not allow them to disable Autoplay.

132. TikTok deploys Autoplay to exploit young users' novelty-seeking minds and especially strong desire to see new activity by continuously playing new and only temporarily viewable image and video posts to keep young users on its Platform as long as possible.

133. Much like "Infinite Scroll" (described below), Autoplay encourages young users to continuously remain on the Platform because it does not require user intervention to choose to view the next video, eliminating user autonomy to make a choice. The video is already loaded and the user need only swipe up. This reduces so-called "friction" in the user experience (*i.e.*, something that slows down a user from performing an action or disengaging with the Platform), and by default and by design, young users are kept on the Platform for longer periods of time.

*iii. Endless or Infinite Scroll*

134. Another dark-pattern feature of the TikTok Platform is endless scrolling, also referred to as "Infinite Scroll." Wherever a user watches a video on TikTok—whether in the For You or Following feed, on another user's profile, or in direct messages—the user endlessly and seamlessly moves from one video to the next simply by swiping up.

135. TikTok designed Infinite Scroll to endlessly load and/or offer new videos for the user to view as the user scrolls through their feed, removing any need to act beyond a simple swipe



to view more videos. As a user scrolls through their feed, the Platform continuously and perpetually selects and shows more videos to the user.

136. Endless scrolling compels young users to spend more time on the Platform by making it difficult to disengage. It strips away a natural stopping point or opportunity to turn to a new activity. This perpetual stream is designed to “keep [users] scrolling, and purposely eliminate any reason for [them] to pause, reconsider or leave.”<sup>24</sup> The user’s experience is a bottomless “flow state” that fully immerses users, distorts their perception of time, and has been shown to be associated with problematic use of social media platforms.<sup>25</sup> TikTok knows that [REDACTED]

[REDACTED] and it intentionally maintains those features.

*iv. TikTok Stories and TikTok LIVE*

137. The ephemeral aspects of TikTok Stories, content that vanishes two hours after being posted, and TikTok LIVE, a livestreaming service within the Platform, are designed to manipulate young users into compulsively returning to the Platform by exploiting young users’ uniquely sensitive “fear of missing out” (“FOMO”).

138. TikTok Stories allows users to post short videos that vanish after 24 hours. By design, this rapidly disappearing content pressures users to check the TikTok Platform more

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<sup>24</sup> Von Tristan Harris, *The Slot Machine in Your Pocket*, Spiegel Int’l (July 27, 2016), <https://www.spiegel.de/international/zeitgeist/smartphone-addiction-is-part-of-the-design-a-1104237.html> [<https://web.archive.org/web/20240923225402/https://www.spiegel.de/international/zeitgeist/smartphone-addiction-is-part-of-the-design-a-1104237.html>].

<sup>25</sup> See Nino Gugushvili, et al., *Facebook Use Intensity and Depressive Symptoms: A Moderated Mediation Model of Problematic Facebook Use, Age, Neuroticism, and Extraversion*, 10 BMC Psych. 1, 3 (Nov. 28, 2022); Christopher L. Heffner, *Doomscrolling: The Ultimate Negative Flow State and Four Ways to Counter It*, AllPsych (Nov. 26, 2022), <https://allpsych.com/doomscrolling-the-ultimate-negative-flow-state/> [<https://web.archive.org/web/20240927135447/https://allpsych.com/doomscrolling-the-ultimate-negative-flow-state/>]; Hannah Jantos, *The Psychology of TikTok: Why You Can’t Stop Scrolling*, Soc. Fixation (Sept. 20, 2022), <https://www.socialfixation.com.au/post/why-its-hard-to-stop-scrolling-psychology-behind-tiktok-scroll> [<https://web.archive.org/web/20240926183139/https://www.socialfixation.com.au/post/why-its-hard-to-stop-scrolling-psychology-behind-tiktok-scroll>].

frequently. TikTok Stories are meant to “inspir[e] audiences to check on their favorite creators daily to never miss a thing.”<sup>26</sup> [REDACTED]

139. TikTok similarly sought to leverage users’ FOMO with the TikTok LIVE feature. By default, LIVE content—livestreamed videos and real-time interaction with TikTok users—is available only once, while the creator livestreams. Users must tune in immediately or lose the opportunity to interact.

140. TikTok compounds the urgency to immediately view LIVE videos with push notifications designed to get users back on the Platform to watch the livestreamed videos, even if they occur at inappropriate times, such as during school hours.

141. TikTok viewed [REDACTED]. It believed [REDACTED]

v. *Push Notifications*

142. Notifications are integral to TikTok’s business goal of prolonging young users’ time spent on its Platform. Notifications are TikTok-created signals displayed on a user’s device with TikTok-created messages that alert a user of activity on the Platform to prompt a return to or continued use of the app. These notifications contain messages crafted and sent by TikTok without third-party involvement. By default, TikTok enables a range of audio and visual “Push Notifications” when the app is installed on a smartphone.

<sup>26</sup> *Creator Academy*, TikTok, <https://www.tiktok.com/creators/creator-portal/en-us/tiktok-content-strategy/tiktok-stories-what-it-is-and-how-to-use-it/> [https://web.archive.org/web/20240330031456/https://www.tiktok.com/creators/creator-portal/en-us/tiktok-content-strategy/tiktok-stories-what-it-is-and-how-to-use-it/] (last visited May 30, 2024).

143. The TikTok Platform’s push notifications are manipulatively designed to alert users on their smartphones and desktops even when the TikTok Platform is not open, and even when the device is not being used.

144. TikTok purposefully and carefully designed these notifications, including how they are “pushed” and displayed, to increase young users’ time spent on its Platform. TikTok takes advantage of well-understood neurological and psychological phenomena, including using sounds and vibrations, to trigger unpredictable dopamine releases and prey on young users’ social sensitivity and fear of missing out on seeing new activity. These notifications include buzzes, lights, sounds, and onscreen messages with the goal of drawing users’ attention to their phones and desktops, and ultimately to the TikTok Platform.

145. To further draw the user’s attention, push notifications are accompanied by a “badge,” a red circle sitting atop the TikTok application icon on the user’s smartphone. The badge remains until the user opens the TikTok Platform.

146. TikTok employees describe the overarching goal of push notifications is [REDACTED]

147. TikTok operationalized this goal by creating a plethora of push notifications to improperly entice users by overloading and overwhelming them to compel a return to the Platform. Some pushes are designed to keep users from quitting the Platform altogether, and others encourage users to open the application.

148. TikTok’s push notifications are manipulatively designed to provide positive stimuli at random, unpredictable intervals interspersed with neutral stimuli. When a positive stimulus is received (*e.g.*, a notification that someone “liked” your post), it creates a psychologically-pleasing dopamine release, keeping a user in a feedback loop to continually check the app for more

rewarding stimuli. Because the rewards are unpredictable and intermittent, users never know if their next notification will be the one that makes them feel really good—which keeps users returning to the Platform compulsively.

149. TikTok knows that its variable reward schedule for delivering notifications

[REDACTED]

150. TikTok has even used fictitious badge notifications to lure users onto the Platform. Badges are commonly used in smartphone applications to display the number of unread messages or notifications an individual may have to address. TikTok relied on this perception to manipulate users into opening its Platform. This deceptively designed system grabs users' attention by displaying badges with random numbers unconnected to any actual content or interactions available on the Platform. TikTok employees describe this as

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

151. Notifications succeed at keeping users on the TikTok Platform as TikTok intends.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

152. Notably, TikTok

[REDACTED]  
[REDACTED] For example, [REDACTED]  
[REDACTED]

Only recently did TikTok stop sending notifications during certain nighttime hours.

153. TikTok employs these coercive, deceptive, and relentless notifications because they are effective at keeping young users on its Platform—irrespective of their harmful effects on users’ health.

*vi. “Likes,” Comments, and Other Interactions*

154. TikTok offers users a “Like” button on its Platform in the form of a heart icon. New Jersey young users can show their appreciation for a video by double tapping on a post they liked viewing.

155. TikTok’s “Likes,” comments, and other interactions, including the number of Likes and the timing, delivery, and packaging of notifications of positive social validation are classified as types of variable rewards since they are

156. Educators explain that Likes “serve as a reward for social media users.”<sup>27</sup> A New York University professor describes what happens to the brain when “someone ‘likes’ your post” on a Platform as “[t]he minute you take a drug, drink alcohol, smoke a cigarette if those are your poison, when you get a ‘like’ on social media, all of those experiences produce dopamine, which is a chemical that’s associated with pleasure.”<sup>28</sup>

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<sup>27</sup> Sophia Petrillo, *What Makes TikTok so Addictive?: An Analysis of the Mechanisms Underlying the World’s Latest Social Media Craze*, Brown Undergraduate J. Pub. Health (Dec. 13, 2021), <https://sites.brown.edu/publichealthjournal/2021/12/13/tiktok/> [https://web.archive.org/web/20240926152056/https://sites.brown.edu/publichealthjournal/2021/12/13/tiktok/].

<sup>28</sup> Eames Yates, *What Happens to your Brain when you get a like on Instagram*, Business Insider, (Mar. 25, 2017), <https://www.businessinsider.com/what-happens-to-your-brain-like-instagram-dopamine-2017-3> [https://web.archive.org/web/20240923233813/https://www.businessinsider.com/what-happens-to-your-brain-like-instagram-dopamine-2017-3].

157. TikTok’s delivery of these dopamine rewards encourage users to post more videos and spend more time on the Platform, which promotes user retention and, again, financially benefits TikTok.

158. TikTok encourages users to respond to videos that have few Likes by automatically showing a TikTok-created prompt suggesting that the viewer should hit the Like button. TikTok’s reasoning behind this is that [REDACTED]

159. The same is true for the manipulatively-designed mechanisms TikTok employs to inform young users of other social interactions on TikTok. TikTok designs tools that exploit dopamine rewards to push users to spend more time on its Platform after receiving comments and video views, in addition to Likes.

160. TikTok Creators see themselves on screen when they livestream. While livestreaming, TikTok designs and engineers its Platform to show Creators a [REDACTED] of Likes, comments, and view counts. This inundation of rewards encourages users to post even more videos.

161. TikTok publicly quantifies and displays the number of these pseudo-social interactions in a way that drives more use of its Platform, despite awareness of the harmful effects on its young users. In internal documents, [REDACTED]

[REDACTED]

162. [REDACTED]

163. TikTok's own research shows that [REDACTED]  
[REDACTED]. For example, [REDACTED]  
[REDACTED]  
[REDACTED]. Alexandra Evans, who later became a TikTok executive, co-authored a report explaining how coercive design impacts teenagers:

Persuasive design strategies exploit the natural human desire to be social and popular, by taking advantage of an individual's fear of not being social and popular in order to extend their online use. For young people, identity requires constant attention, curation and renewal. At key development states it can be overwhelmingly important to be accepted by your peer group.<sup>29</sup>

164. TikTok's design and display of highlighting social validation and quantification metrics has an especially powerful effect on teenagers and can neurologically alter teenagers' perception of online posts.

165. A 2022 TikTok study found that use of the TikTok Platform was indirectly related to body dissatisfaction through more upward appearance comparison (i.e., users comparing their appearances to those of individuals they deem more attractive than themselves) and body surveillance (i.e., users scrutinizing and monitoring their own bodies), which results in greater body dissatisfaction.<sup>30</sup>

166. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] TikTok continues to [REDACTED]

<sup>29</sup> Kidron, *supra* note 18, at 21.

<sup>30</sup> See Danielle Bissonette Mink & Dawn M. Szymanski, *TikTok Use and Body Dissatisfaction: Examining direct, indirect, and moderated relations*, 43 *Body Image* 205, 205-08 (2022).

[REDACTED]

[REDACTED]

**F. TikTok, In Pursuit of Profit, Disregards the Harms its Features Cause to Young Users**

167. The Platform's manipulatively-designed features perpetuate addiction, and directly harm young users' mental and physical health. Excessive, compulsive, or habitual use correlates with many negative mental health effects, such as [REDACTED]

[REDACTED] Compulsive use of the Platform also interferes with essential personal responsibilities like [REDACTED] [REDACTED] which increases the risk of mood disorders such as depression and anxiety.

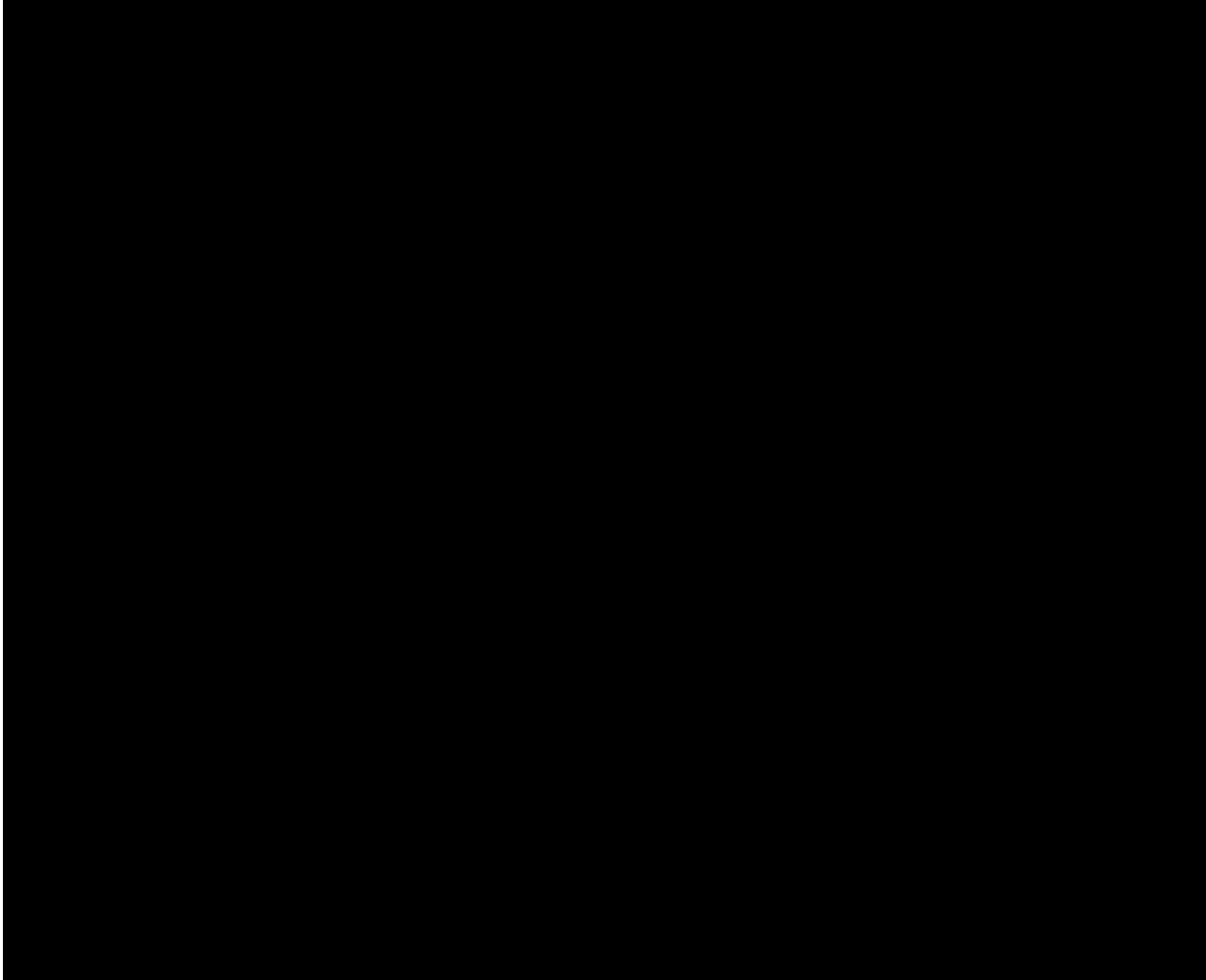
168. Internal TikTok documents [REDACTED]

[REDACTED]

[REDACTED]

169. Excessive, compulsive, or habitual use of TikTok causes many of the same harmful effects to minors as substance use disorders.





170. [Redacted]

[Redacted]

[Redacted]

171. Internally, [Redacted]

[Redacted]

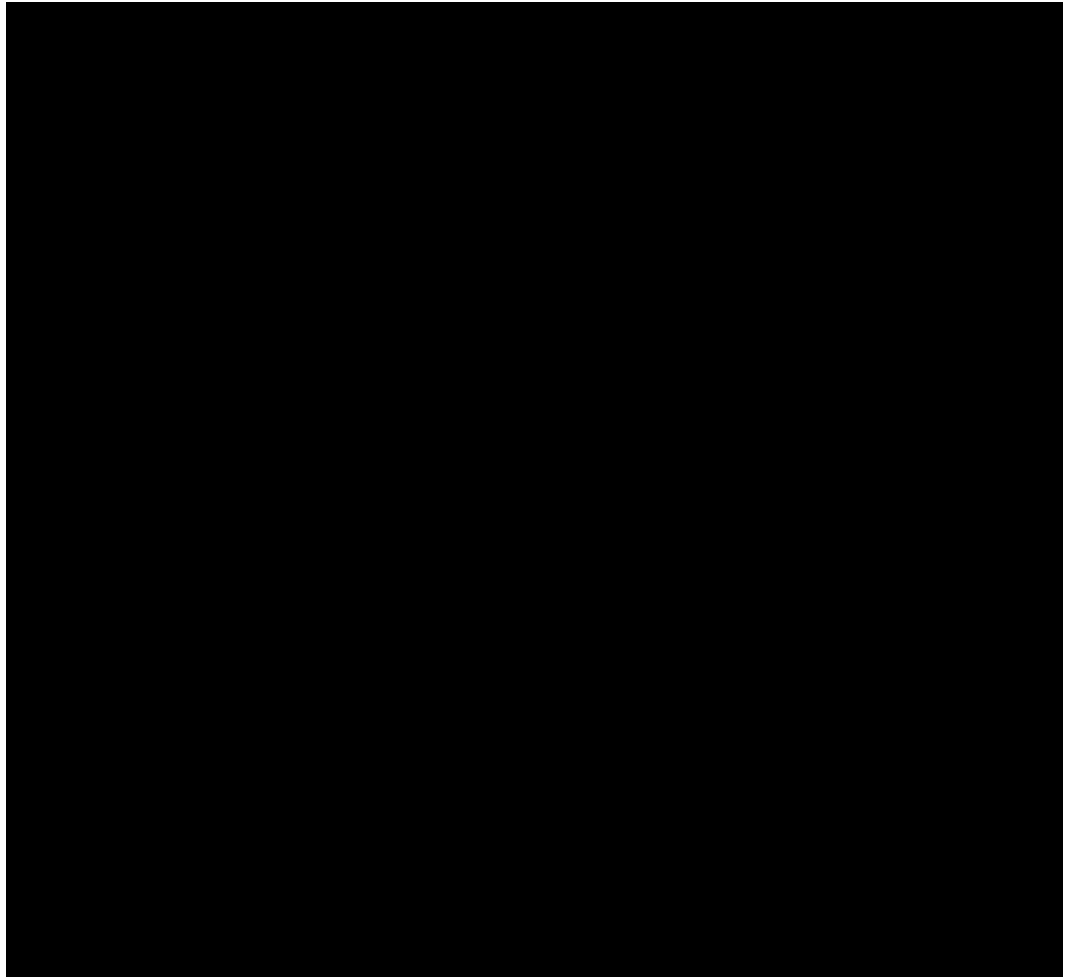
[Redacted]

172. Internal documents confirm that [Redacted]

[Redacted]

[Redacted]

173. Internal documents also confirm [REDACTED] that:



174. Research corroborates [REDACTED] that social media addiction, including excessive usage of TikTok, is harmful to minors. For example:

- Research shows that experiencing puberty while being a heavy social media user interferes with a crucial developmental period for social learning and friendship formation. Heavy users may emerge from puberty stunted or otherwise harmed, perhaps permanently.<sup>31</sup>

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<sup>31</sup> See, e.g., Amy Orben et al., *Windows of Developmental Sensitivity to Social Media*, 13 *Nature Commc'n* 1 (2022).

- Research also shows that “[a]t the individual level, many [young people] have pointed to negative correlations between intensive social media use and both subjective well-being and mental health.”<sup>32</sup>
- One study demonstrates that deactivating social media leads to “significant improvements in well-being, and in particular in self-reported happiness, life satisfaction, depression, and anxiety.”<sup>33</sup>

175. By maximizing the TikTok Platform’s addictive properties, TikTok has cultivated a generation of young users who spend hours a day on its Platform—more than they would otherwise choose—which is highly detrimental to young users’ development and ability to attend to personal needs and responsibilities.

176. One such harmful effect bears special mention: TikTok’s negative effect on young users’ sleep.

177. Insufficient sleep causes a slew of health problems for minors, including neurological deficiencies, dysregulated emotional functioning, heightened risk of suicide, and many other mental health harms. Excessive, compulsive, and habitual use of TikTok’s Platform keeps minors using it late at night and decreases the amount and quality of their sleep.

178.   


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<sup>32</sup> Hunt Allcott, et. al, *The Welfare Effects of Social Media*, 110 Am. Econ. Rev. 629, 630 (2020).

<sup>33</sup>*Id.*



179. [REDACTED] use of the Platform impairs young users' sleep, [REDACTED]

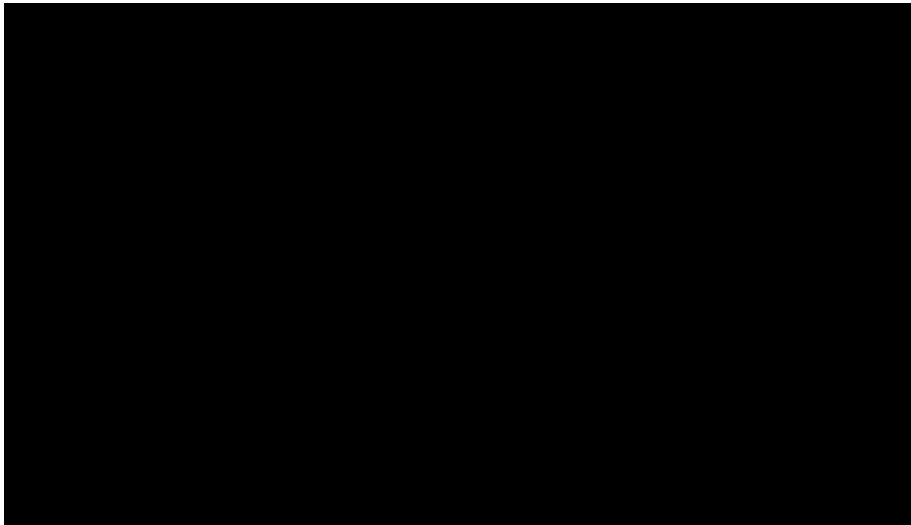
[REDACTED] which TikTok's internal documents [REDACTED]

180. [REDACTED]

[REDACTED]

181. Late night and excessive usage also directly impacting young users in New Jersey.

[REDACTED]



182. Young people are particularly attuned to FOMO, and often feel a need to check social media at night to assuage the fear that they may miss out on popular or engaging videos. To that end, some teenagers frequently wake up at night to check social media notifications.

183. Ultimately, TikTok knows that [REDACTED]



[REDACTED] Yet to date, TikTok has not made the necessary changes to its Platform to avoid these outcomes.

**G. TikTok Misrepresents its Significant Role in Content Creation to Conceal that it Manipulates Young Users to Stay on the Platform Longer**

184. Many posts that young users see on the Platform are paid for, or otherwise created or developed in whole or in part by TikTok, to generate more content to manipulate young users into staying on the Platform for longer periods.

185. TikTok pays creators to produce content on TikTok. [REDACTED]



[REDACTED]. TikTok then launched its Creator Fund in 2020. The Creator Fund has been open to users who are allegedly over eighteen years old, have at least 10,000 followers, and secured

100,000 video views within the last thirty days. The amount TikTok has paid those users is based on several factors including, but not limited to, engagement and views.

186. [REDACTED]

[REDACTED] For instance, [REDACTED]  
[REDACTED]  
[REDACTED]

187. The current iteration of the Creator Fund is TikTok’s Creator Rewards Program, which, TikTok claims, offers up to twenty times greater rewards (monetary payments) than the Creator Fund. The Creator Rewards Program provides payouts based on how engaging the posts are, including “Play Duration,” “Audience Engagement” and “Search Value.”<sup>34</sup> TikTok not only directed the Creators to post certain material intended to keep users on the Platform, it also gave personalized “suggestions based on your existing content, your followers’ search interests, and potential earnings from the Creator Rewards Program.”<sup>35</sup>

188. [REDACTED] Internal emails show that

[REDACTED]  
[REDACTED] To outsiders, those secondary account users appeared to be normal users, but, in reality, these accounts were actually operated and run by TikTok employees.

189. Media outlets also reported that ByteDance asked employees to mine its competitor, Instagram for popular content, such as posts tagged with #BeachGirl, and upload the content to TikTok using shadow accounts.

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<sup>34</sup> *Creator Rewards Program*, TikTok (May 31, 2024), <https://www.tiktok.com/creator-academy/en/article/creator-rewards-program> [<https://web.archive.org/web/20240511060536/https://www.tiktok.com/creator-academy/en/article/creator-rewards-program>].

<sup>35</sup> *Id.*

190. The ploy worked: [REDACTED]

[REDACTED]

**H. TikTok Rejected** [REDACTED]

191. TikTok declined [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

192. Collaborative filtering is another way that TikTok increases user engagement. Collaborative filtering results in each TikTok user being shown the video sequence that has the highest probability of inducing that particular user to spend more time on the Platform. This video sequence is based on that user's individual history of interaction with the Platform contextualized within the engagement histories of other users with similar patterns of interaction. Collaborative filtering, as employed by TikTok's recommendation system, relies on the content-agnostic engagement metrics described herein and is not based on the underlying content of the videos, which the recommendation system's algorithms do not identify.

193. In 2022, a subset of TikTok employees [REDACTED]

[REDACTED]

[REDACTED] This alternative to collaborative filtering could have [REDACTED]

[REDACTED]

Platform. But TikTok CEO Shou Zi Chew [REDACTED]

[REDACTED]

194. TikTok also considered [REDACTED] other alternate design features related to screen time management and anti-addiction measures [REDACTED] compulsive use of the Platform. For example:

- TikTok decided [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
- Notwithstanding TikTok’s [REDACTED]  
[REDACTED]  
[REDACTED] it took years for the company to roll out a feature allowing users to mute notifications. TikTok delayed making this easy fix [REDACTED]  
[REDACTED]. Even when TikTok finally implemented this feature, it did so in a substantially weakened form, by requiring young users to affirmatively opt into some aspects of the feature— [REDACTED]
- TikTok continues to reject options that would help young users. Although internal documents note that [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]—TikTok still refuses to impose actual, meaningful restrictions.
- In 2023, TikTok represented that it set a 60-minute default screen-time limit for users under the age of 18. However, TikTok’s “limit” is not a hard stop, but rather merely an easily avoidable checkpoint because users can disable the screen by entering a passcode. [REDACTED]



[REDACTED]  
[REDACTED]  
[REDACTED]

195. By contrast, TikTok’s sister platform available only in China, Douyin, imposes effective safety restrictions for young users, such as limiting some minors to 40 minutes of use per day, limiting the platform’s availability to certain hours, and implementing a five-second pause between videos if they spend too long on the app.

196. TikTok’s internal documents [REDACTED]  
[REDACTED]  
[REDACTED] but, as indicated above, TikTok decided to not implement the same safety measures for young users in the United States.

197. To that end, TikTok’s former Global Head of Minor Safety stated [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

198. Ultimately, TikTok intentionally chose not to utilize Douyin’s safety restrictions on the TikTok Platform to protect young users in the United States.

**I. TikTok’s Unconscionable and Abusive Practices Coerce Young Users to Excessively and Compulsively Use the Platform in an Unhealthy Manner**

199. TikTok’s attempts to coerce young users into spending excessive amounts of time on the Platform have been successful. Many minors use the Platform compulsively and excessively, and some have become addicted to TikTok.

200. In 2021, an internal TikTok research report [REDACTED]

[REDACTED]

[REDACTED]

201. As shown in the chart below, [REDACTED]

[REDACTED]

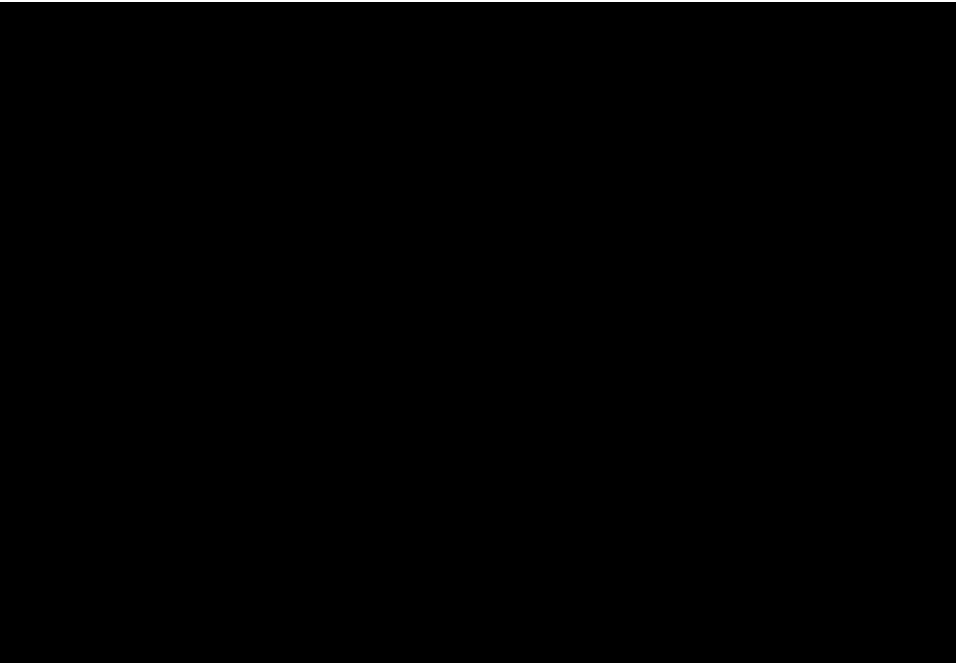
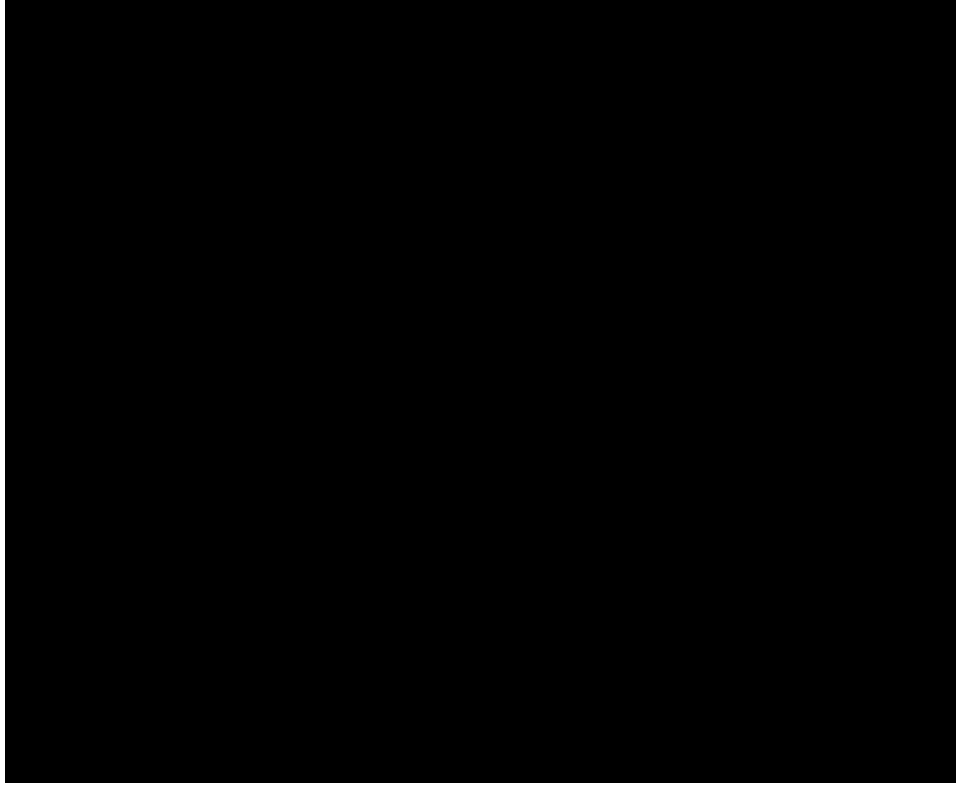
[REDACTED]

[REDACTED]

202. Additional internal TikTok statistics show that, [REDACTED]

[REDACTED]

[REDACTED]



203. External surveys also show that 16% of U.S. teens say they use the TikTok Platform “almost constantly.”<sup>36</sup> Another 32% say they use it “several times a day.”<sup>37</sup> Of the teens aged thirteen to seventeen surveyed across all 50 states by the Boston Children’s Digital Wellness lab in 2022, 64% reported that they use TikTok daily.<sup>38</sup> As described in paragraphs 167 through 183 *supra*,

**J. TikTok Deceptively Advertises its Platform as Safe, Well Moderated, and Appropriate for Young Users**

204. TikTok tells New Jersey users, particularly young users and their parents, that its Platform is safe, well-moderated, and appropriate for young users. It publicly states that it provides a series of safety features to promote young users’ mental health.

205. TikTok makes these statements because it knows that safety is material to young users and their parents. TikTok’s own internal research,

206. Despite TikTok misrepresented the safety of the Platform and concealed the danger to its young users, all while being aware that its Platform is unsafe and poorly moderated, and that its advertised features do not work as represented.

<sup>36</sup> Emily A. Vogels et al., *Teens, Social Media and Technology 2022*, Pew Research Ctr. (Aug. 10, 2022), <https://www.pewresearch.org/internet/2022/08/10/teens-social-media-and-technology-2022/> [<https://web.archive.org/web/20241001090148/https://www.pewresearch.org/internet/2022/08/10/teens-social-media-and-technology-2022/>].

<sup>37</sup> *Id.*

<sup>38</sup> David Bickham, et al., *The Digital Wellness Lab’s Pulse Survey, Adolescent Media Use: Attitudes, Effects, and Online Experiences*, Boston Children’s Digital Wellness Lab 10 (Aug. 2022).

1. TikTok misrepresents and conceals the harmful effects of its Platform and design features.

207. TikTok actively conceals known dangers caused by its design features from its young users and their parents. Instead, it misrepresents the company as one that prioritizes safety for young users. For example:

- On TikTok’s website, the company represented: “We care deeply about the well-being of our community members and want to be a source of happiness, enrichment, and belonging . . . . We work to make sure this occurs in a supportive space that does not negatively impact people’s physical or psychological health.”<sup>39</sup>
- In written testimony to Congress on March 23, 2023, CEO Shou Zi Chew, who previously explained that he is “responsible for all the strategic decisions at TikTok”<sup>40</sup> stated: “Safety and wellness—in particular for teens—is a core priority for TikTok.”<sup>41</sup>
- Shou Zi Chew further testified: “[T]here are more than 150 million Americans who love our platform, and we know we have a responsibility to protect them, which is why I’m making the following commitments to you and to all our users. Number one, we will keep safety, particularly for teenagers, as a top priority for us.”<sup>42</sup>

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<sup>39</sup> *Mental Behavioral Health*, TikTok (Mar. 2023), <https://www.tiktok.com/community-guidelines/en/mental-behavioral-health/?cgversion=2023> [<https://web.archive.org/web/20230729135436/https://www.tiktok.com/community-guidelines/en/mental-behavioral-health/?cgversion=2023>].

<sup>40</sup> Celine Kang, *Who is Shou Chew, TikTok’s Chief Executive?*, New York Times (Mar. 23, 2023), <https://www.nytimes.com/2023/03/23/technology/who-is-shou-chew-tiktok-ceo.html> [<https://web.archive.org/web/20240924174813/https://www.nytimes.com/2023/03/23/technology/who-is-shou-chew-tiktok-ceo.html>].

<sup>41</sup> Written Testimony of Shou Zi Chew Before the U.S. House Comm. on Energy & Commerce, (March 23, 2023) (hereinafter “Chew Written Testimony”).

<sup>42</sup> *Id.*

- In a TED Talk in April 2023, Shou Zi Chew referred back to his commitments before Congress, reiterating his commitment “that we take safety, especially for teenagers, extremely seriously, and we will continue to prioritize that.”<sup>43</sup> He went on to say, “[y]ou know, I believe that [we] need to give our teenage users, and our users in general, a very safe experience. . . . If they don’t feel safe, we cannot fulfill our mission. So, it’s all very organic to me as a business to make sure that I do that.”<sup>44</sup>
- Following the death of children copying the “Blackout Challenge,” TikTok officially responded by stating: “At TikTok, we have no higher priority than protecting the safety of our community, and content that promotes or glorifies dangerous behavior is strictly prohibited and promptly removed to prevent it from becoming a trend on our platform.”
- TikTok touts its so-called “safety features” that, ostensibly, render the Platform safe. For instance, in a March 1, 2023, blog post, TikTok announced a series of features, including: (1) changes to help young users manage their time on TikTok; and (2) providing parents with enhanced safety tools, such as custom daily screen time limits, screen time dashboard, and mute notifications, that allegedly increased the safety of the Platform. The blog post, under the “Safety” section of TikTok’s website, claimed that “[t]hese features add to our robust existing safety settings for teen accounts.”<sup>45</sup>

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<sup>43</sup> *TikTok's CEO on Its Future — and What Makes Its Algorithm Different*, TED (Apr. 2023), [https://www.ted.com/talks/shou\\_chew\\_tiktok\\_s\\_ceo\\_on\\_its\\_future\\_and\\_what\\_makes\\_its\\_algorithm\\_different?hasSummary=true&subtitle=en](https://www.ted.com/talks/shou_chew_tiktok_s_ceo_on_its_future_and_what_makes_its_algorithm_different?hasSummary=true&subtitle=en) [[https://web.archive.org/web/20240924182721/https://www.ted.com/talks/shou\\_chew\\_tiktok\\_s\\_ceo\\_on\\_its\\_future\\_and\\_what\\_makes\\_its\\_algorithm\\_different?hasSummary=true&subtitle=en](https://web.archive.org/web/20240924182721/https://www.ted.com/talks/shou_chew_tiktok_s_ceo_on_its_future_and_what_makes_its_algorithm_different?hasSummary=true&subtitle=en)] (hereinafter “Chew TED Talk”).

<sup>44</sup> *Id.*

<sup>45</sup> Cormac Keenan, *New Features for Teens and Families on TikTok*, TikTok (Mar. 2023), <https://newsroom.tiktok.com/en-us/new-features-for-teens-and-families-on-tiktok-us> [<https://web.archive.org/web/20240927053305/https://newsroom.tiktok.com/en-us/new-features-for-teens-and-families-on-tiktok-us>].

- Similarly, in an October 17, 2022, post on the TikTok website, TikTok claimed the Platform was safe: “We have a vibrant and inspiring community on TikTok, and it’s important that our platform remains a safe, supportive, and joyful place for our community.”<sup>46</sup>

208. Further, TikTok’s Community Guidelines represent that its Platform “is a source of entertainment and enrichment where you can discover, create, and connect with others across the world . . . . We have Community Guidelines to create a welcoming, safe, and entertaining experience.”<sup>47</sup> TikTok further states, “[w]e are deeply committed to TikTok being a safe and positive experience for people under the age of 18.”<sup>48</sup>

209. TikTok does not tell users or their parents and/or guardians that it

Nor does TikTok disclose

that

and

that it

210. TikTok deceives users by engaging in these and similar misrepresentations, and by failing to disclose critical, material information regarding its Platform’s risks, as alleged in paragraphs 211 through 218, *infra*. TikTok’s deception and lack of transparency prevent young users and their parents from making truly informed decisions about Platform usage.

<sup>46</sup> *Enhancing the LIVE Community Experience with New Features, Updates, and Policies*, TikTok, (Oct. 17, 2022), <https://newsroom.tiktok.com/en-us/enhancing-the-live-community-experience> [<https://web.archive.org/web/20231129051101/https://newsroom.tiktok.com/en-us/enhancing-the-live-community-experience>].

<sup>47</sup> *Community Guidelines*, TikTok (May 17, 2024), <https://www.tiktok.com/community-guidelines/en/?cgversion=2023> [<https://web.archive.org/web/20240920073513/https://www.tiktok.com/community-guidelines/en>].

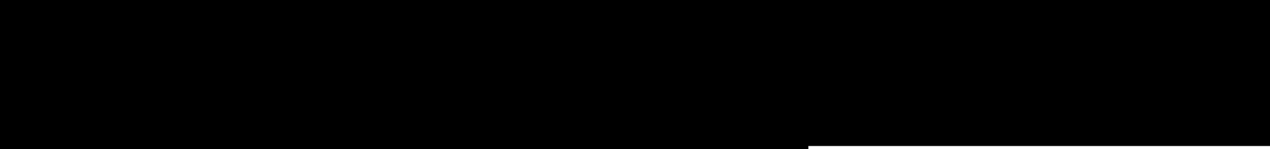
<sup>48</sup> *Youth Safety and Well Being*, TikTok, <https://www.tiktok.com/community-guidelines/en/youth-safety?cgversion=2023> [<https://web.archive.org/web/20240509043157/https://www.tiktok.com/community-guidelines/en/youth-safety?cgversion=2023>] (last visited May 9, 2024).

2. TikTok deceives the public regarding the efficacy of its time management tools to combat prolonged user engagement.

211. Leaders at TikTok downplay and deny the impact of the Platform’s manipulative design elements by emphasizing that the Platform provides a positive experience for users and incorporates time-management tools.

212. When asked by Congress in October 2021 if TikTok is specifically designed to keep users engaged as long as possible, TikTok’s Vice President & Head of Public Policy Michael Beckermen testified: “We want to make sure that people are having an entertaining experience, you know like TV or movies, TikTok is meant to be entertaining. But we do think we have a responsibility, along with parents, to make sure that it’s being used in a responsible way.”<sup>49</sup>

213. In April 2023 at a TED Talk conversation, Shou Zi Chew reiterated that TikTok’s “goal is not to optimize and maximize time spent. It is not.”<sup>50</sup> He further denied that TikTok has a financial incentive to maximize users’ time spent on the Platform, stating: “Even if you think about it from a commercial point of view, it is always best when your customers have a very healthy relationship with your product . . . .”<sup>51</sup>

214. This public statement contradicts and deceptively conceals TikTok’s relentless —a practice TikTok has engaged in for years. As discussed above, TikTok exploits psychological vulnerabilities to keep young users compulsively using its Platform.

215. TikTok executives have proclaimed that the Platform’s in-app time management tools are designed to encourage appropriate usage of the Platform. At a congressional hearing

<sup>49</sup> *Senate Commerce Subcommittee Hearing on Consumer Protection* at 2:27:20, CSPAN, (Oct. 26, 2021) <https://www.c-span.org/video/?515533-1/online-protection-children#> [<https://web.archive.org/web/20240924214141/https://www.c-span.org/video/?515533-1/online-protection-children>].

<sup>50</sup> Chew TED Talk, *supra* note 43.

<sup>51</sup> *Id.*



about prolonged engagement in October 2021, Michael Beckermen emphasized, “We have take-a-break videos, we have time management tools, and family pairing is another tool where parents can help limit the time their teenagers are spending on the app.”<sup>52</sup> And at a TED Talk in April 2023, Shou Zi Chew brought up TikTok’s time management tools and intervention, stating: “If you spend too much time on our platform, we will proactively send you videos to tell you to get off the platform. And depending on the time of day: If it’s late at night, [the video] will come sooner.”<sup>53</sup> By promoting these tools, TikTok creates the impression that it is effectively managing compulsive use, instead of encouraging it through its features.

216. TikTok knew these statements were

Meaning, TikTok employees

a safer app experience for its users.

217. Through these representations, TikTok misleads consumers, particularly young users and their parents, into thinking that the app is not designed for excessive, compulsive, or habitual use and in fact has effective tools to mitigate such use, when it does not. In reality, compulsive use is woven into the very fabric of the app. TikTok’s internal documents show that

218. TikTok engages in unconscionable or abusive, deceptive, and misleading commercial practices that prevent users from making informed decisions about their usage of the Platform by: (1) creating false impressions that TikTok mitigates excessive, compulsive, or

<sup>52</sup> *Senate Commerce Subcommittee Hearing on Consumer Protection*, *supra* note 49.

<sup>53</sup> Chew TED Talk, *supra* note 43.

habitual use, and (2) omitting critical information about TikTok’s encouragement of excessive, compulsive, or habitual use.

**K. TikTok Deceives New Jersey Consumers about the Efficacy of its So-Called Time Management Tools**

219. In addition to omitting and misrepresenting critical information about the compulsive design of its Platform, TikTok also deceives New Jersey consumers about its purported “safety features.”

220. The TikTok app has several so-called screen time management functions, including: (1) a screen-time limit: a feature purportedly designed to “limit” teen users to 60 minutes on the Platform by default; (2) a screen-time dashboard: a page where users can “get a summary of your time spent on TikTok”; (3) family safety mode: a feature that “links a parent’s TikTok account to their teen’s” to allow parents to control young users’ daily screen time, ability to send direct messages on the app, and types of content teens may view; and (4) take-a-break videos: videos that are pushed at periodic intervals to encourage users to take a break from the Platform. TikTok advertises these features as tools to aid youth wellbeing, but the functions are manipulatively designed to appear to reduce excessive, compulsive, and habitual use without making meaningful changes.

1. TikTok’s claimed 60-minute limit is not a limit.

221. Announced right before Shou Zi Chew testified to Congress, TikTok has since repeatedly pushed the idea that it sets an automatic 60-minute daily screen-time limit for teens.

222. In a March 1, 2023 blog post on its website, former Head of Trust and Safety, Cormac Keenan, wrote that the screen time management tool would provide teen users with a “60-minute daily screen-time limit.”<sup>54</sup> But this tool does not actually impose a screen-time limit after using TikTok for 60 minutes. Teens are simply prompted to enter a passcode that they have

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<sup>54</sup> Keenan, *supra* note 45.

previously created in order to continue watching. Users can also freely change when this prompt occurs, with default options ranging from after 40 minutes to 2 hours on TikTok per day, or disable the tool entirely.

223. Research shows that there is a direct correlation between the more time teens spend beyond their first hour on social media each day and worsening mental health. [REDACTED]

[REDACTED]

224. [REDACTED]

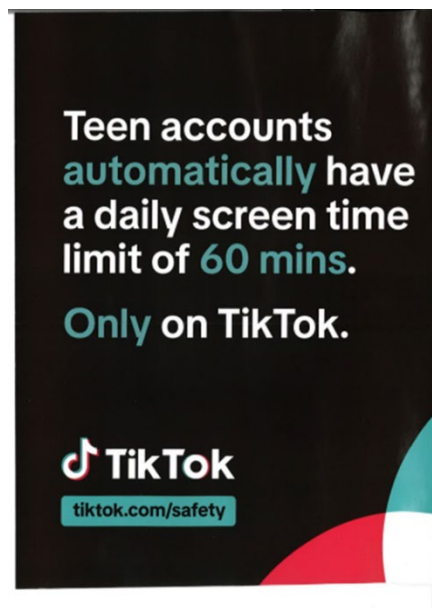
[REDACTED]

225. TikTok's default "time limit" proved to have negligible impact. [REDACTED]

[REDACTED]

—the company did not revisit the tool’s design and continued to promote the tool as an effective mechanism to reduce young users time on the Platform.

226. As public concern grew that TikTok was addictive and unsafe for young users, it was important for TikTok to [REDACTED]. Therefore, after releasing the 60-minute-prompt tool, TikTok made an announcement on the Newsroom page of its website, which was picked up by news stations and journalists across the United States, including in New Jersey. However, TikTok failed to disclose how it actually works. For example, one advertisement in the *Washington Examiner*, a news magazine more likely to be read by adults than teenagers, stated only that “[t]een accounts automatically have a daily screen time limit of 60 mins. Only on TikTok.”



227. TikTok’s advertisement does not disclose that the screen time limit can be easily bypassed or disabled. TikTok made similar or identical public representations in other contexts, including January 2024 advertisements for *The Washington Post* reading “[t]een accounts automatically have a daily screen time limit of 60 mins.” These advertisements leave consumers—

especially parents who do not use the Platform—with a false impression that this tool imposes an actual limit on teen screen time, creating a false belief that TikTok effectively addressed concerns around excessive, compulsive, and habitual use.

2. TikTok deceptively promoted its screen-time dashboard [REDACTED]

228. TikTok externally promoted its screen-time dashboard as a tool to make the Platform safe for young users, but internally continued to optimize the Platform to keep young users on the Platform without regard to potential harms.

229. In press releases posted to its website in 2019 and 2020, external newsletters, such as its June 2022 Creator Newsletter, and posts on TikTok’s website, TikTok explained through a step-by-step process how to implement screen time management.<sup>55</sup>

230. TikTok also promoted its screen time management tools to parents and guardians through partnership with the National PTA. For instance, in February 2022, TikTok published an article on its website entitled “Introducing Family Safety Mode and Screentime Management in Feed,” writing: “As part of our commitment to safety, the wellbeing of our users is incredibly important to us. We want people to have fun on TikTok, but it’s also important for our community to look after their wellbeing which means having a healthy relationship with online apps and services.”<sup>56</sup>

231. [REDACTED]

<sup>55</sup> *Screen Time*, TikTok, <http://support.tiktok.com/en/account-and-privacy/account-information/screen-time> [<https://web.archive.org/web/20240107073950/support.tiktok.com/en/account-and-privacy/account-information/screen-time>] (last visited May 31, 2024).

<sup>56</sup> Keenan *supra* note 45.

232. Although TikTok publicizes its safety features as intended to reduce excessive, use, internal analyses show that [REDACTED]

[REDACTED]

233. Rather, [REDACTED]. In other words, [REDACTED]

[REDACTED]

[REDACTED] More specifically, according to an internal [REDACTED] document [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

234. Similarly, in an internal chat message [REDACTED]

[REDACTED]

[REDACTED]

3. TikTok [REDACTED] while publicly boasting about their efficacy.

235. TikTok promotes screen time management tools for young users that it knows are ineffective. For example, [REDACTED]

[REDACTED]

[REDACTED]

236. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

237. TikTok also promoted other screen time management features as actions taken by TikTok to promote safety. One such feature is the ability for young users to mute push notifications for a set period of time in an effort to minimize distractions. However, internally, TikTok [REDACTED]

[REDACTED]

[REDACTED] In a similar fashion, TikTok’s Weekly Screen Time Update Notification feature sends young users a personalized notification detailing their Platform usage statistics to encourage screen time management. Again, internally, TikTok [REDACTED]

[REDACTED]

238. TikTok touts its “Take a Break” videos, which seemingly encourage users to stop using the TikTok Platform after long sessions. TikTok CEO Shou Zi Chew even referenced the videos in an interview with Andrew Ross Sorkin of *The New York Times* at the 2022 DealBook

summit. [REDACTED]

239. Another feature that TikTok heavily promotes to parents and parent groups is Family Pairing, which, according to TikTok, “allows parents and teens to customize their safety settings based on individual needs.”<sup>57</sup> Yet TikTok [REDACTED]

[REDACTED]. As an internal document notes, [REDACTED]

[REDACTED] Moreover, teens can easily bypass Family Pairing. The half measure function works only on TikTok’s mobile application, so teens can avoid parent-imposed restrictions simply by using their phone or desktop browser.

240. Not only are these screen time management features ineffective, but TikTok also makes them hard to find. Many of the features are hidden behind multiple screens, reducing their use and effectiveness. Internal documents [REDACTED]

241. TikTok unfairly and abusively compounded the addictiveness of the TikTok Platform for young users through their faulty and deceptive implementation and disclosure of these features. TikTok represents these time management and other safety tools as legitimate

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<sup>57</sup> *User Safety*, TikTok, <http://support.tiktok.com/en/safety-hc/account-and-user-safety/user-safety> [<https://web.archive.org/web/20240528043614/support.tiktok.com/en/safety-hc/account-and-user-safety/user-safety#4>] (last accessed May 31, 2024).



interventions designed to promote young users' healthy usage of the Platform. But TikTok withheld, and continues to withhold, material information about the effectiveness of these tools and does not provide consumers with the crucial information they need to assess the safety of the Platform.

**L. TikTok Deceives Users about its Beauty Filters**

242. [REDACTED]

TikTok omits any notice to its users (or their parents) that using the filters on its Platform can be dangerous.

243. TikTok's "Youth Safety and Well-Being" page claims the company is "deeply committed to ensuring TikTok is a safe and positive experience for people under the age of 18."<sup>58</sup> TikTok proceeds to proclaim that youth safety is a "priority," and that TikTok creates a "developmentally appropriate" experience that is a "safe space" for "self-exploration."<sup>59</sup>

244. TikTok did not disclose that it knew effects like beauty filters can harm its young users and [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

245. TikTok [REDACTED]

[REDACTED]. Nonetheless, TikTok actively promotes

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<sup>58</sup> *Youth Safety and Well Being*, *supra* note 52.

<sup>59</sup> *Id.*

them. By omitting the [REDACTED] of these features, TikTok actively conceals and omits material information regarding the features' [REDACTED] from its users and their parents.

**M. TikTok Deceives Users About the Efficacy of its “Refresh” and “Restricted Mode” Features**

246. In addition to omitting and misrepresenting critical information about the Platform’s compulsive design features, TikTok deceives consumers by promoting features purportedly designed to help users manage their content feeds but that, in reality, are intended to be ineffective. Features such as the “Refresh” feature allegedly allows users to “reset” their respective For You Feeds, and the “Restricted Mode” feature allegedly limits the appearance of content that may not be appropriate for all audiences, yet both features suffer from intentional minimal efficacy.

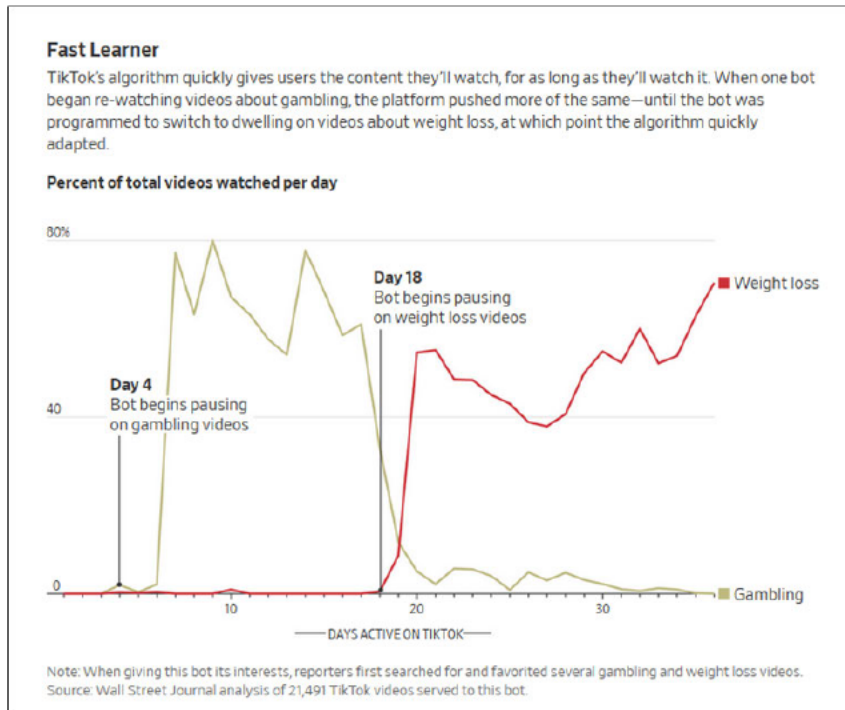
1. TikTok misrepresents users’ ability to “Refresh” their feed to escape harmful rabbit holes.

247. A TikTok user experiences a “rabbit hole” (also known as a “filter bubble”) when they encounter a high percentage of sequential videos on the same or similar topics. TikTok knows that rabbit holes harm their young users—particularly when these rabbit holes feed young users videos that trigger anxiety or depression, or provoke other harmful effects (for example, by feeding users videos that trigger FOMO, harmful social comparison, self-harm, or disordered eating).

248. The recommendation system creates rabbit holes by quickly evaluating users’ interests and then repeatedly pushing videos about those interests regardless of content. *The Wall Street Journal* published a chart showing just how quickly the recommendation system learns a user’s interest and then pushes content related to that interest.<sup>60</sup>

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<sup>60</sup> Tawnell D. Hobbs et al., ‘*The Corpse Bride Diet*’: *How TikTok Inundates Teens With Eating-Disorder Videos*, Wall Street J. (Dec. 17, 2021), <https://www.wsj.com/articles/how-tiktok-inundates-teens-with-eating-disorder-videos-11639754848> [<https://web.archive.org/web/20240925182945/https://www.wsj.com/articles/how-tiktok-inundates-teens-with-eating-disorder-videos-11639754848>].



249. In internal documents, [REDACTED]

250. Even rabbit holes that could be innocuous to some can be harmful to specific individuals. One internal document [REDACTED]

251. After an exposé on TikTok’s algorithm and the harm caused to users stuck in rabbit holes, TikTok made changes to its Platform that it calls “Algo Refresh.”

252. The Algo Refresh feature purportedly allows users suffering from rabbit holes—or who are otherwise dissatisfied with the videos TikTok feeds them—to “reset” the For You feed.

According to an internal [REDACTED] document, [REDACTED]

[REDACTED]

[REDACTED]

253. After much [REDACTED] external pressure, on March 16, 2023, TikTok announced the new “Refresh your For You feed” feature.<sup>61</sup>

254. [REDACTED]

[REDACTED]

255. TikTok billed the Refresh feature on its website as “[t]he option to start fresh on TikTok.”<sup>62</sup>

256. It further explained that: “[w]hen enabled, this feature allows someone to view content on their For You feed as if they just signed up for TikTok. Our recommendation system will then begin to surface more content based on new interactions.”<sup>63</sup>

257. TikTok makes similar statements to users who access the Refresh feature on the TikTok Platform. When users open the “Refresh your For You feed” page in the Platform’s settings, they are asked: “Want a fresh start?” The Platform informs users that activating the Refresh feature will allow them to “launch your new feed.”<sup>64</sup>

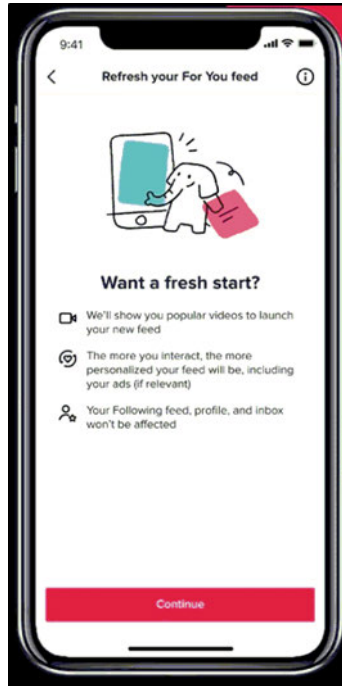
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<sup>61</sup> Sandeep Grover & Mabel Wang, *Introducing a Way to Refresh Your For You Feed on TikTok*, TikTok (Mar. 16, 2023), <https://newsroom.tiktok.com/en-us/introducing-a-way-to-refresh-your-for-you-feed-on-tiktok-us> [<https://web.archive.org/web/20240430163405/https://newsroom.tiktok.com/en-us/introducing-a-way-to-refresh-your-for-you-feed-on-tiktok-us>].

<sup>62</sup> *See id.*

<sup>63</sup> *Id.*

<sup>64</sup> Video, TikTok, <https://p16-v.tiktok.com/obj/musically-maliva-obj/0a66a83d69c5ba153546bb9b8fd0efbc.gif> [<https://web.archive.org/web/20240927210731/https://p16-v.tiktok.com/obj/musically-maliva-obj/0a66a83d69c5ba153546bb9b8fd0efbc.gif>] (last accessed May 31, 2024) (hereinafter “Refresh Video”).



258. Spokespeople for TikTok repeated these claims to reporters. For instance, the news outlet *TechCrunch* reported in February 2023:

With the new refresh button, which will be available in account settings, users will be able to force the app to bring “new, diversified content not based on previous activity or interactions” to their For You feed. After hitting the button, users will then begin to see content that’s based on their new interactions, a TikTok spokesperson told *TechCrunch*. In addition to providing a refreshed feed, the company noted that the feature could serve as a way to support potentially vulnerable users who want to distance themselves from their current content experience.<sup>65</sup>

259. These public statements led consumers to reasonably believe that resetting the For You feed would result in a completely new feed as if they were new users.

260. However, the Refresh feature was never expected to succeed. First, this feature is hidden behind a complex series of settings. [REDACTED]

<sup>65</sup> Sarah Perez, *TikTok Introduces a Strike System for Violations, Tests a Feature to ‘Refresh’ the For You Feed*, *TechCrunch* (Feb. 2, 2023), <https://techcrunch.com/2023/02/02/tiktok-introduces-a-strike-system-for-violations-tests-a-feature-to-refresh-the-for-you-feed/> [<https://web.archive.org/web/20230326192400/https://techcrunch.com/2023/02/02/tiktok-introduces-a-strike-system-for-violations-tests-a-feature-to-refresh-the-for-you-feed/>].

[REDACTED]

261. Not only did TikTok design the Refresh feature not to be used, but it did not even make the feature work. [REDACTED]

[REDACTED]

262. For users previously stuck in rabbit holes, the recommendation system quickly reintroduces videos based on the same engagement data that led them into the rabbit hole in the first place.

263. The Refresh feature also fails to reset presentation of personalized ads. [REDACTED]

264. TikTok did not even make the Refresh feature available for some users. [REDACTED]

265. TikTok has not disclosed these material facts to users or the public, nor did it disclose that [REDACTED]

266. Contrary to TikTok’s representations, users may find that they are quickly back in the same rabbit hole again even after using the Refresh feature.

2. TikTok deceives users about Restricted Mode’s ability to filter appropriate content for young users and keep them safe on the Platform.

267. TikTok deceives users about the efficacy of “Restricted Mode.” TikTok publicly described “Restricted Mode” in an October 2019 post to its Newsroom as “an option that limits the appearance of content that may not be appropriate for all audiences.”<sup>66</sup>

268. TikTok’s website advises parents to enable this tool for their teens: “Note: If you’re a parent and your teen uses TikTok, it might make sense to enable this setting to ensure the content they are viewing is age-appropriate.”<sup>67</sup>

269. On its website, during the relevant time period, TikTok said that users in Restricted Mode “shouldn’t see mature or complex themes, such as: [p]rofanity[, s]exually suggestive content[, r]ealistic violence or threatening imagery[, f]irearms or weapons in an environment that isn’t appropriate[, i]llegal or controlled substance/drugs[, and e]xplicit references to mature or

<sup>66</sup> *TikTok’s Top 10 Tips for Parents*, TikTok (Oct. 16, 2019), <http://newsroom.tiktok.com/en-us/tiktoks-top-10-tips-for-parents> [<https://web.archive.org/web/20240118194000/newsroom.tiktok.com/en-us/tiktoks-top-10-tips-for-parents>].

<sup>67</sup> *Limiting Unwanted Content*, TikTok (Apr. 25, 2019), <https://newsroom.tiktok.com/en-us/limiting-unwanted-content> [<https://web.archive.org/web/20231129050315/https://newsroom.tiktok.com/en-us/limiting-unwanted-content>]; see also *TikTok’s Top 10 Tips for Parents*, *supra* note 66 (listing “enabling Restricted Mode” as a tip for parents and describing Restricted Mode as “an option that limits the appearance of content that may not be appropriate for all audiences”).

complex themes that may reflect personal experiences or real-world events that are intended for older audiences.”<sup>68</sup>

270. TikTok advertised the Platform’s Restricted Mode as an “‘appropriate’ experience” to “family-oriented partners,” such as the National Parent Teacher Association and Family Online Safety Institute.

271. TikTok promoted this feature to its partners, including [REDACTED] and [REDACTED], to increase the publicity of its dubious claims. In TikTok’s estimation, [REDACTED]—an understanding that was then reflected in several [REDACTED]

272. Yet TikTok [REDACTED], and instead, [REDACTED]

273. For instance, [REDACTED]

274. Indeed, nearly two years after TikTok began making these misrepresentations on its website, TikTok’s Global Head of Minor Safety told TikTok’s U.S. Safety Head that

275. Moreover, Restricted Mode encompasses only the For You feed. A minor using the Platform can easily circumvent the feature by, for example, watching videos that are sent directly to them, uploaded by accounts they follow, or by searching for the videos.

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<sup>68</sup> *Restricted Mode*, TikTok, <https://support.tiktok.com/en/safety-hc/account-and-user-safety/restricted-mode> [<https://web.archive.org/web/20240927211618/https://support.tiktok.com/en/safety-hc/account-and-user-safety/restricted-mode>] (last visited Sept. 16, 2024) (explaining “[w]hat types of content aren’t available under Restricted Mode”).



276. An internal [REDACTED] found that [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**N. TikTok Deceives Young Users, Their Parents, and Their Guardians about the Application and Enforcement of its Community Guidelines**

277. TikTok misrepresents and omits critical information about the application and enforcement of its “Community Guidelines.” Specifically, TikTok misrepresents how effectively the Guidelines are applied, to whom and what they apply, and the role of experts in forming the Community Guidelines.

1. TikTok deceives users, their parents, and their guardians about how effectively its Community Guidelines are applied.

278. In its Community Guidelines, as recently as April 30, 2024, TikTok claimed that it “[r]emove[s] violative content from the platform that breaks our rules.”<sup>69</sup> TikTok’s Community Guidelines set out a number of rules as to different types of topics, including not allowing any “violent threats, incitement to violence, or promotion of criminal activities that may harm people, animals, or property,” “hateful behavior, hate speech, or promotion of hateful ideologies,” “youth exploitation and abuse,” “showing, promoting, or sharing plans for suicide or self-harm,”

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<sup>69</sup> *Community Guidelines*, *supra* note 47.

“showing or promoting disordered eating or any dangerous weight loss behaviors,” and “showing or promoting dangerous activities and challenges,” among other rules.

279. TikTok has long made such statements to the public, including reporters, parents, and government regulators.

280. For instance, Shou Zi Chew testified to Congress on March 23, 2023, that “anything that is violative and harmful we remove [from the Platform].”<sup>70</sup> Similarly, when he testified to Congress on January 31, 2024, Chew claimed that TikTok’s “robust Community Guidelines strictly prohibit content or behavior that puts teenagers at risk of exploitation or other harm -- and we vigorously enforce them.”<sup>71</sup> TikTok repeated that latter statement on its website.

281. TikTok uses the comprehensiveness of its Community Guidelines to reassure parents and others that its Platform is a safe product for young users. TikTok states that its Community Guidelines “apply equally to everyone and everything on our platform.”<sup>72</sup>

282. In a TED Talk in April 2023, Shou Zi Chew explained that TikTok has “very clear community guidelines. We are very transparent about what is allowed and what is not allowed on our platform. No executives make any ad hoc decisions. And based on that, we have built a team

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<sup>70</sup> Chew Written Testimony, *supra* note 41, at 42.

<sup>71</sup> *Senate Hearing with CEOs of Meta, TikTok, X, Snap and Discord About Child Safety 1/31/24 Transcript*, Rev (Feb. 1, 2024), <https://www.rev.com/blog/transcripts/senate-hearing-with-ceos-of-meta-tiktok-x-snap-and-discord-about-child-safety-1-31-24-transcript> [https://web.archive.org/web/20240925183519/https://www.rev.com/blog/transcripts/senate-hearing-with-ceos-of-meta-tiktok-x-snap-and-discord-about-child-safety-1-31-24-transcript]; Clare Duffy, et al., *Mark Zuckerberg Apologizes to Families Over Social Media Harms in Contentious Senate Hearing*, CNN (Jan. 31, 2024), <https://www.cnn.com/tech/live-news/meta-x-discord-tiktok-snap-chiefs-testify-senate/index.html> [https://web.archive.org/web/20240201092109/https://www.cnn.com/tech/live-news/meta-x-discord-tiktok-snap-chiefs-testimony-senate#h\_1eb2a5cb38ac8dd4e3bf3b1a4fb07e5e]; *TikTok CEO Shou Chew’s Opening Statement – Senate Judiciary Committee Hearing on Online Child Sexual Exploitation Crisis – January 31, 2024*, TikTok (Jan. 31, 2024) <https://newsroom.tiktok.com/en-us/opening-statement-senate-judiciary-committee-hearing> [https://web.archive.org/web/20240510085428/https://newsroom.tiktok.com/en-us/opening-statement-senate-judiciary-committee-hearing] (hereinafter “Chew Opening Statement”).

<sup>72</sup> *Community Guidelines*, *supra* note 47.

that is tens of thousands of people plus machines in order to identify content that is bad and actively and proactively remove it from the platform.”<sup>73</sup>

283. These representations are misleading to the public. [REDACTED]

284. Even though TikTok’s Community Guidelines claim that content about seductive performances by minors, drugs, gore, and physically dangerous behavior is removed or not allowed under its terms of service, in many circumstances, TikTok permits such content to remain on the Platform.

285. Instead of actually removing harmful content from the Platform, as it claims it does, TikTok often [REDACTED]

286. For example, TikTok’s Community Guidelines claim that “[s]eductive performances by young people,” are prohibited on the Platform. The Guidelines define “[s]eductive performances” as “involv[ing] certain body movements that are intended to be sexually arousing, such as undressing (stripteases), pelvic thrusting, breast shaking, and fondling.” TikTok does not actually enforce this provision of the Community Guidelines. Rather, videos

[REDACTED] are not prohibited on the Platform in the United States. Instead, such

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<sup>73</sup> Chew TED Talk, *supra* note 43, at 15:20.

a video is merely [REDACTED] A training document [REDACTED]  
[REDACTED]  
[REDACTED] Despite TikTok's statements  
that its Community Guidelines exist to protect younger users, [REDACTED]  
[REDACTED]  
[REDACTED]

287. Similarly, instead of removing “[d]angerous weight-loss behavior” videos—such as videos that promote laxatives to lose weight, or videos that promote losing more than 10 pounds of weight in a week through extreme diet or exercise routines—from the Platform, as stated in the Community Guidelines, TikTok merely internally labels the videos [REDACTED] While this designation prevents the videos from appearing in users’ For You feeds, they remain visible to and searchable by minors. [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

288. TikTok engaged in similar conduct for other types of videos as well. For example, the Community Guidelines claim that TikTok “do[es] not allow showing or *promoting* recreational drug use, or the trade of alcohol, tobacco products, and drugs.”<sup>74</sup>

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<sup>74</sup> *Regulated Goods and Commercial Activities*, TikTok (Mar. 2023), <https://www.tiktok.com/community-guidelines/en/regulated-commercial-activities/>

289. Yet contrary to this representation, videos that mention illegal drugs remain on TikTok's Platform. Videos promoting drugs by [REDACTED] [REDACTED] were also left on the Platform. [REDACTED]

290. In some instances, some of TikTok's Community Guidelines were never enforced at all. For instance, TikTok's Community Guidelines prohibited content that "depicts or promotes the misuse of legal substances . . . in an effort to become intoxicated[.]"<sup>75</sup> But from December 2020 until August 2022, [REDACTED] [REDACTED]

291. Similarly, TikTok's Community Guidelines prohibited "[c]ontent that depicts dangerous driving behavior."<sup>76</sup> Yet TikTok's internal policy was clear: [REDACTED]

[REDACTED] Again, TikTok [REDACTED] [REDACTED]

292. TikTok also failed to remove gore even though its current Community Guidelines state: "We do not allow gory, gruesome, disturbing, or extremely violent content."<sup>77</sup> Gore, like drugs and dangerous driving, remains available on the Platform, [REDACTED] [REDACTED]

293. This pattern applies to other parts of the Platform too. For instance, the Community Guidelines, claimed that "[o]ur guidelines listed above also apply to comments and messages."

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[<https://web.archive.org/web/20231003222957/https://www.tiktok.com/community-guidelines/en/regulated-commercial-activities/>] (emphasis added).

<sup>75</sup> *Community Guidelines*, *supra* note 47.

<sup>76</sup> *Id.*

<sup>77</sup> *Sensitive and Mature Themes, Community Guidelines*, TikTok, <https://www.tiktok.com/community-guidelines/en/sensitive-mature-themes#4>

[<https://web.archive.org/web/20241002184204/https://www.tiktok.com/community-guidelines/en/sensitive-mature-themes#4>] [under "Shocking and Graphic Content"].

But TikTok is even more lax in its enforcement of these guidelines when it comes to direct messages.

294. For instance, as discussed above, the Community Guidelines as recently as April 30, 2024, claimed that the Platform prohibits “[s]eductive performances by young people[.]” Videos of those performances are not recommended. But TikTok does not prohibit or in any way reduce the visibility of such videos when they are sent via direct message. Similarly, content showing minors possessing or using drugs, alcohol, and tobacco are, according to the Community Guidelines, forbidden from the Platform. [REDACTED]

295. Although TikTok publicly represents that it has moderators, internally it knows that much of its moderation [REDACTED] and [REDACTED] because TikTok created an ineffective system. [REDACTED]

[REDACTED] For many types of content, [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] This ineffective system results in much of the Platform not being meaningfully moderated. [REDACTED]  
[REDACTED]  
[REDACTED]

296. Even though TikTok did not enforce its Community Guidelines, [REDACTED]  
[REDACTED] When managing negative fallout after press reported that a child was in the emergency room after attempting a dangerous TikTok challenge, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

297. TikTok also does not disclose that its content moderation policies are [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] This lack of meaningful oversight in content moderation exposes youth to harmful harassment, bullying, and solicitation.

298. TikTok misleads the public as to the diligence of its content moderation. To reassure the public of its commitment to content moderation, TikTok publishes metrics such as “proactive removal” rate, but this metric simply captures how fast TikTok removes content that it is able to locate, not how much content it is able to remove overall. Internally, TikTok notes that

[REDACTED]

[REDACTED]

[REDACTED] Although TikTok boasts thorough content review processes, it does not disclose significant “leakage” rates, measuring the percentage of violative content that is not moderated or removed. Internally, TikTok knows the rate at which certain categories of content leak through its moderation processes,

including: [REDACTED]

[REDACTED]

[REDACTED]

299. TikTok omits this context from its representations, instead assuring consumers, particularly parents and youth, that its content moderation is increasingly effective.

2. TikTok misrepresents who is subject to its Community Guidelines.

300. On its website, a previous version of TikTok’s Community Guidelines stated that the Community Guidelines apply “to everyone and everything on our platform.” Despite this representation, TikTok treats some users differently.

301. TikTok permits popular videos from certain Creators, that violate its Community Guidelines, to stay on the Platform. One internal analysis [REDACTED] noted that [REDACTED]

[REDACTED]

After being urged by creator management teams—which work with popular Creators to produce content for the Platform—TikTok allowed otherwise violative content to remain on its Platform.

302. Even when TikTok’s moderation team wanted to enforce the Community Guidelines, certain groups of users [REDACTED]

[REDACTED]

303. For accounts that TikTok [REDACTED] an internal analysis [REDACTED] found that [REDACTED]

[REDACTED] To appear to comply with its own Community Guidelines, TikTok misled consumers by stating it removed harmful material, but actually left much of that material on its Platform.

3. TikTok misrepresents its incorporation of expert recommendations into its Community Guidelines.

304. TikTok represents on its website that its Community Guidelines are “informed by international legal frameworks, industry best practices, including the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the Convention on the Rights



of Children, and the Santa Clara Principals. [TikTok] also seek[s] input from our community, safety and public health experts, and our Advisory Councils.”<sup>78</sup>

305. TikTok’s representations are misleading, if not outright false. TikTok [REDACTED] expert recommendations in its creation and enforcement (or lack thereof) of the Community Guidelines. For example, [REDACTED]

306. In addition to failing to implement expert recommendations, TikTok misstates expert recommendations. For instance, Shou Zi Chew testified before Congress in March 2023 that TikTok is working with experts to build policies for content that is “not inherently harmful, like some of the extreme fitness videos about people running 100 miles” but can become harmful if shown too much. Shou Zi Chew said that “the experts are telling us that we should disperse [this content] more, and make sure that they are not seen too regularly . . . [e]specially by younger users.”<sup>79</sup>

307. [REDACTED] TikTok knew that [REDACTED]

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<sup>78</sup> *Community Principles*, TikTok (May 17, 2024) <https://www.tiktok.com/community-guidelines/en/community-principles> [<https://web.archive.org/web/20240928085712/https://www.tiktok.com/community-guidelines/en/community-principles/>].

<sup>79</sup> Chew Written Testimony, *supra* note 41 at 42-43.

308. Contrary to TikTok’s public statements, its practices are not aligned with expert recommendations. TikTok misrepresents what experts recommend and its implementation of those recommendations.

**O. TikTok Deceives Users with its Application Store Age Ratings**

309. TikTok’s application is usually downloaded through the App Store or Google Play. Both application stores prominently show TikTok’s age rating, which parents and other members of the public rely on to determine whether TikTok is age appropriate.

310. A developer wishing to make an application available in the App Store must describe the frequency and intensity of varying types of content that appear in the application. Based on these responses, the App Store automatically assigns an age rating.

311. If a developer knows an application is not suitable for young users, the developer may also manually select “17+,” which is the highest age rating.

312. To achieve a 12+ rating for its app on the App Store, TikTok represented that the app contains only “Infrequent/Mild” instances of the following types of content: “Sexual Content and Nudity”; “Alcohol, Tobacco, or Drug Use or References”; “Mature/Suggestive Themes”; “Profanity or Crude Humor”; and “Cartoon or Fantasy Violence.”<sup>80</sup>

313. These representations are not merely responses to Apple. Instead, they are public-facing; they appear on the App Store entry for the TikTok app.

314. Google Play’s rating process also requires an app’s developer to make representations about an app’s content. A developer wishing to make an application available in Google Play in the United States must answer a content questionnaire provided by the International

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<sup>80</sup> *TikTok*, Apple App Store, <https://apps.apple.com/us/app/tiktok/id835599320> [<https://web.archive.org/web/20240930224241/https://apps.apple.com/us/app/tiktok/id835599320>] (last visited Sept. 30, 2024).

Age Rating Coalition. TikTok completed the questionnaire and received a “T” or “Teen” rating for the TikTok app on Google Play, which means that the content is generally suitable for ages thirteen and up.

315. As with the App Store, the TikTok app’s “T” rating is public-facing; it is displayed prominently on the app’s Google Play entry.

316. Not only did TikTok deceive the raters to obtain false age ratings, it advertised those ratings to the public, including parent groups like the National PTA and its affiliate members, and the media.

317. Each time TikTok advertised its Platform’s age ratings on the App Store and Google Play it engages in misrepresentation.

318. According to Apple, parents can use the App Store’s age ratings to “determine what is appropriate for their children.”<sup>81</sup> Similarly, per Google’s description, age ratings inform parents “of potentially objectionable content within an app.”<sup>82</sup> And parents do in fact rely on the application stores’ ratings.

319. TikTok has produced a plethora of guidebooks and briefing documents for parents or other third parties that highlight TikTok’s application store age ratings. Many of them address TikTok’s age ratings. For instance, in a widely distributed, earlier version of its Guardians Guide, TikTok stated:

TikTok can be downloaded from the App Store, Google Play Store, Amazon Appstore, and other official application platforms. We’ve given the app a 12+ rating specifically so caregivers can access the device-level Apple and Android controls built into your family’s devices.

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<sup>81</sup> *App Store*, Apple <https://www.apple.com/app-store/> [<https://web.archive.org/web/20240531012858/https://www.apple.com/app-store/>] (last accessed May 31, 2024).

<sup>82</sup> *Apps & Games Content Ratings on Google Play*, Google <https://support.google.com/googleplay/answer/6209544> [<https://web.archive.org/web/20240916005832/https://support.google.com/googleplay/answer/6209544>] (last accessed Sept. 16, 2024).

320. TikTok's internal documents [REDACTED]

[REDACTED] TikTok has used these talking points many times in communications and representations to third parties.

321. Had TikTok accurately represented the content available on its Platform, the TikTok application would only have been eligible for the respective app stores' most restrictive age ratings—limiting its availability to younger users.

322. Instead, TikTok exposes young users to age-inappropriate content. This content is both abundant and easily accessible on TikTok. Further, the recommendation system promotes and curates inappropriate content for young users, and [REDACTED]

323. In September 2021, *The Wall Street Journal* released findings of a study that browsed TikTok using nearly three dozen automated accounts registered as teenagers between ages thirteen and fifteen. The *Wall Street Journal* found that the Platform showed the teenage accounts “more than 100 videos from accounts recommending paid pornography sites and sex shops,” thousands of videos “from creators who labeled their content as for adults only,” and other videos inappropriate for minors to see.<sup>83</sup>

324. As the *Journal* further reported, “TikTok served one account registered as a 13-year-old at least 569 videos about drug use, references to cocaine and meth addiction, and promotional videos for online sales of drug products and paraphernalia.”<sup>84</sup> According to the

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<sup>83</sup> Rob Barry et al., *How TikTok Serves Up Sex and Drug Videos to Minors*, Wall St. J. (Sept. 8, 2021), <https://www.wsj.com/articles/tiktok-algorithm-sex-drugs-minors-11631052944> [<https://web.archive.org/web/20240917102330/https://www.wsj.com/articles/tiktok-algorithm-sex-drugs-minors-11631052944>].

<sup>84</sup> *Id.*

*Journal*, “[h]undreds of similar videos appeared in the feeds of the Journal’s other minor accounts.”<sup>85</sup>

325. The *Wall Street Journal* also found that other videos served to the minor accounts “glorified alcohol, including depictions of drinking and driving and of drinking games.”<sup>86</sup>

326. Indeed, as *Business Insider* found, “[a]ccounts [on the TikTok Platform] run by people purporting to sell drugs are commonplace and easy to find via a few cursory searches on the app’s Discover page.”<sup>87</sup>

327. The plethora of age-inappropriate content on the TikTok Platform belies TikTok’s public representations that it is appropriate for ages “12+” or for “Teens.”

**P. TikTok Misrepresents that Users Under the Age of Thirteen are not Permitted to Create Accounts and are Banned from TikTok Upon Discovery**

328. TikTok’s Community Guidelines require all users to be “13 years and older to have an account.”<sup>88</sup> If TikTok “learn[s] someone is below the minimum age to have an account on TikTok we will ban that account.”<sup>89</sup> Despite TikTok’s proclamation that users under thirteen years of age cannot use its Platform, TikTok [REDACTED]

329. Starting in 2017, Musical.ly required most new users to enter their age to create an account on the app, and this change carried over to the TikTok Platform following Musical.ly’s rebranding as TikTok in August 2018.

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<sup>85</sup> *Id.*

<sup>86</sup> *Id.*

<sup>87</sup> Rosie Bradbury, *TikTok Drug Sellers Are Using Nose and Snowflake Emoji and Slang To Get Around Search Blocks and Peddle Cocaine and Mushrooms*, *Business Insider* (May 3, 2022), <https://www.businessinsider.com/tiktok-accounts-use-nose-snowflake-emoji-to-advertise-cocaine-shrooms-2022-4> [<https://web.archive.org/web/20241001001027/https://www.businessinsider.com/tiktok-accounts-use-nose-snowflake-emoji-to-advertise-cocaine-shrooms-2022-4>].

<sup>88</sup> *Community Guidelines*, *supra* note 47.

<sup>89</sup> *Id.*

330. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Additionally, users who created a TikTok account by inputting their Facebook or Google credentials [REDACTED]

[REDACTED]

331. TikTok's system suffered a critical loophole: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] This Facebook or Google loophole resulted in approximately [REDACTED] accounts with a listed age younger than thirteen, in violation of the Platform's Community Guidelines.

332. This was not an isolated incident—throughout its lifespan, TikTok has known that there were, and continue to be, large numbers of children joining and using the Platform. For example, internal TikTok documents [REDACTED]

[REDACTED]

333. An internal document [REDACTED]

[REDACTED]

[REDACTED]

334. An internal TikTok Trust and Safety Memo [REDACTED]

[REDACTED]

335. [REDACTED]

[REDACTED]

[REDACTED]

336. An internal [REDACTED] document [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

337. TikTok has [REDACTED]

[REDACTED], notwithstanding TikTok’s representations in its Community

Guidelines. There, TikTok assured the public that any users discovered to be under the age of

thirteen will be banned. Specifically, TikTok states, “If we learn someone is below the minimum

age to have an account on TikTok, we will ban that account.”<sup>90</sup> TikTok deceived New Jersey

consumers by choosing not to remove users under the age of thirteen from its Platform upon

learning about their existence.

338. Before April 1, 2020, TikTok’s content moderation team followed a self-defeating

internal policy when removing accounts that TikTok “suspected” of belonging to a user under the

age of thirteen years old. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Meaning, for example, [REDACTED]

[REDACTED]

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<sup>90</sup> TikTok Community Guidelines, Youth Safety & Well-Being (May 17, 2024), [www.tiktok.com/community-guidelines/en/youth-safety](https://www.tiktok.com/community-guidelines/en/youth-safety) [<https://web.archive.org/web/20240923171554/https://www.tiktok.com/community-guidelines/en/youth-safety>].

[REDACTED]

[REDACTED] Community Guidelines.

339. A more recent account removal policy amended this process, but it was also fundamentally flawed. As recently as June 2023, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] This means, for example, [REDACTED]

[REDACTED]

[REDACTED] Community Guidelines.

340. Despite TikTok's [REDACTED] of TikTok users, including New Jersey users under the age of thirteen on its Platform, TikTok repeatedly violated its own internal and external policies by allowing the under-age accounts to remain active.



**COUNT I**

**VIOLATIONS OF THE CFA BY DEFENDANTS  
(UNCONSCIONABLE AND ABUSIVE COMMERCIAL PRACTICES)**

341. Plaintiffs reallege and incorporate by reference each and every factual allegation in the paragraphs above as if the same were fully set forth herein.

342. The CFA, N.J.S.A. 56:8-2, prohibits:

The act, use or employment by any person of any commercial practice that is unconscionable or abusive, deception, fraud, false pretense, false promise, misrepresentation, or the knowing[] concealment, suppression, or omission of any material fact with intent that others rely upon such concealment, suppression or omission, in connection with the sale or advertisement of any merchandise or real estate, or with the subsequent performance of such person as aforesaid, whether or not any person has in fact been misled, deceived or damaged thereby, is declared to be an unlawful practice...

343. The CFA defines “merchandise” as including “any objects, wares, goods, commodities, services or anything offered, directly or indirectly to the public for sale.” N.J.S.A. 56:8-1(c).

344. The CFA defines “person” as including “any natural person or his legal representative, partnership, corporation, company, trust, business entity or association, and any agent, employee, salesman, partner, officer, director, member, stockholder, associate, trustee or cestuis que trustent.” N.J.S.A. 56:8-1(d).

345. The CFA defines “sale” as including “any sale, rental or distribution, offer for sale, rental or distribution or attempt directly or indirectly to sell, rent or distribute.” N.J.S.A. 56:8-1(e).

346. At all relevant times, all Defendants are persons that have engaged in the advertisement and sale of merchandise with the meaning of N.J.S.A. 56:8-1(c)-(e).

347. In the operation of TikTok's business, Defendants have engaged in the use of unconscionable commercial practices.

348. At various times, Defendants have engaged in unconscionable and abusive commercial practices in connection with young users to promote their excessive, compulsive, or habitual use of and/or addiction to TikTok's Platform, including but not limited to, the following:

- a. TikTok unconscionably and/or abusively employed features that increase excessive, compulsive, and/or habitual use in young users despite its awareness that excessive, compulsive, and/or habitual use of the TikTok Platform was harmful to young users' physical and psychological health; and
- b. TikTok unconscionably and/or abusively employed features that induce an intermittent-variable-dopamine-reward schedule in young users for the purpose of extracting more time and attention from young users than they would otherwise choose to give. TikTok used the reward schedule to override young users' ability to self-regulate, aware that their developing brains are not equipped to resist TikTok's manipulative tactics. The manipulative and dark-pattern features designed and employed by TikTok include:
  - i. Effects;
  - ii. AutoPlay;
  - iii. Endless and Infinite Scroll;
  - iv. TikTok Stories and TikTok LIVE;
  - v. Push Notifications;
  - vi. Likes, Comments, and Other Interactions;
  - vii. Beauty Filters, such as RETOUCH and Bold Glamour; and

viii. Shadow Accounts.

349. TikTok's use of manipulative, exploitive, and harmful features to increase revenue through the increased collection of data and other sales from young users, to their detriment, are unconscionable and/or abusive commercial acts or practices.

350. At all relevant times, TikTok had a thorough understanding of the mental and physical harms suffered as a consequence of the excessive, compulsive, or habitual use by young users of its Platform.

351. TikTok's acts and practices alleged herein, including TikTok's actions taken to encourage young users' unhealthy excessive, compulsive, or habitual use of, and addiction to, its Platform, are offensive to public policy. The protection of New Jersey consumers from the harms of addiction and related afflictions are well-established objectives underlying public policy of New Jersey.

352. Each unconscionable and/or abusive commercial practice by Defendants constitutes a separate violation under the CFA, specifically N.J.S.A. 56:8-2.

## **COUNT II**

### **VIOLATIONS OF THE CFA BY DEFENDANTS (FALSE PROMISES, MISREPRESENTATIONS, AND DECEPTION)**

353. Plaintiffs reallege and incorporate by reference each and every factual allegation in the paragraphs above as if the same were fully set forth herein.

354. Defendants' conduct in violation of the CFA includes, but is not limited to, the following acts of false promises, misrepresentations and/or deception:

- a. TikTok misrepresented and falsely stated that its Platform is not psychologically or physically harmful for young users, when in fact it is psychologically and physically harmful for young users;

- b. TikTok misrepresented and falsely stated that its Platform does not induce young users' compulsive and extended use, when it in fact does so;
- c. TikTok misrepresented and falsely stated that its Platform is less addictive and/or less likely to result in psychological and physical harm for young users than its Platform is in reality;
- d. TikTok misrepresented and falsely stated that the following features were intended to meaningfully reduce young users time spent on the Platform, despite taking action to limit their effectiveness:
  - i. Screen-time limit;
  - ii. Screen-time dashboard;
  - iii. Family Safety Mode;
  - iv. Family Pairing;
  - v. Take-A-Break Videos;
- e. TikTok misrepresented and falsely stated the efficacy of both the Refresh Mode and Restricted Mode;
- f. TikTok misrepresented and falsely stated that its content moderation practices adequately moderated the content on the Platform;
- g. TikTok misrepresented and falsely stated its actual practices in its Community Guidelines, including its reliance on expert recommendations;
- h. TikTok misrepresented and falsely promised to prioritize young users' health and safety over maximizing profits, when in fact TikTok subordinated young users' health and safety to its goal of maximizing profits by prolonging young users' time spent on its Platform to collect hordes of data;

- i. TikTok misrepresented and falsely stated that TikTok prevents under-thirteen users from using TikTok when in fact TikTok knew that it does not prevent under-thirteen users from using TikTok;
- j. TikTok misrepresented and falsely stated that TikTok's collection of young user data was to be used safely and properly, when in reality TikTok collected and deployed user data to the detriment of young users' mental and physical health;
- k. TikTok deceived New Jersey consumers when it advertised its Apple and Google age ratings, which were based upon misrepresentations about the platform that TikTok made during Apple and Google's application process with full knowledge that Apple and Google would rely on TikTok's representations and make them public;
- l. TikTok deceived New Jersey consumers by purporting that it does not allow users on the Platform under the age of thirteen, when in reality it knew there were users on the Platform under the age of thirteen and did not remove them; and
- m. TikTok made the false promise that young users will be safe and protected on its Platform; however, young users are susceptible to many features designed to be compulsive and that cause harmful physical and mental health issues.
- n. TikTok made other false and deceptive representations, including as set forth in paragraphs 204 through 340.

355. Each false promise, misrepresentation, and act of deception by Defendants constitutes a separate violation under the CFA, specifically N.J.S.A. 56:8-2.

**COUNT III**

**VIOLATIONS OF THE CFA BY DEFENDANTS  
(KNOWING OMISSIONS OF MATERIAL FACT)**

356. Plaintiffs reallege and incorporate by reference each and every factual allegation in the paragraphs above as if the same were fully set forth herein.

357. Defendants' conduct in violation of the CFA includes, but is not limited to, the following knowing omissions of material fact:

- a. Material facts concerning TikTok's relentless targeting of users' time and attention, and measuring success based on metrics;
- b. Material facts concerning the harms associated with the following features of the TikTok Platform:
  - i. Effects, including Beauty filters;
  - ii. Refresh Mode;
  - iii. Auto-Play;
  - iv. Endless/Infinite Scrolling;
  - v. TikTok Live;
  - vi. Push Notifications;
  - vii. Restricted Mode;
  - viii. Screen-time limit;
  - ix. Screen-time dashboard;
  - x. Family Safety Mode;
  - xi. Family Paring; and
  - xii. Take-A-Break Videos;

- c. Material facts concerning the application and enforcement of TikTok's Community Standards, including lack of and inefficiency of content moderation efforts; and
- d. Material facts related to key metrics concerning TikTok's content moderation enforcement, such as its awareness that violative content is making its way onto the Platform.

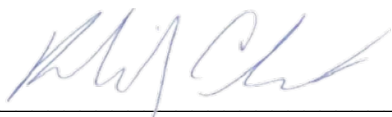
358. Each knowing omission of material fact by Defendants constitutes a separate violation under the CFA, specifically N.J.S.A. 56:8-2.

**PRAYER FOR RELIEF**

WHEREFORE, based upon the foregoing allegations, Plaintiffs respectfully request that the Court enter judgment against Defendants:

- (a) Finding that the acts and practices of all Defendants constitute multiple instances of unlawful practices in violation of the CFA, N.J.S.A. 56:8-1 to -229;
- (b) Permanently enjoining all Defendants and their owners, officers, directors, shareholders, founders, managers, members, agents, servants, employees, representatives, independent contractors, and all other persons or entities under their control, from engaging in, continuing to engage in or doing any acts or practices in violation of the CFA, N.J.S.A. 56:8-1 to -229;
- (c) Directing Defendants, jointly and severally, to pay the maximum statutory civil penalties for each and every violation of the CFA, in accordance with N.J.S.A. 56:8-13;
- (d) Directing Defendants, jointly and severally, to pay costs and fees, including attorneys' fees, for the use of the State of New Jersey, as authorized by N.J.S.A. 56:8-11 and N.J.S.A. 56:8-19;
- (e) Directing Defendants, jointly and severally, to disgorge all profits unlawfully acquired or retained, as authorized by N.J.S.A. 56:8-8; and
- (f) Granting such other relief as the interests of justice may require.

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiffs

By:   
Kashif T. Chand  
Deputy Attorney General

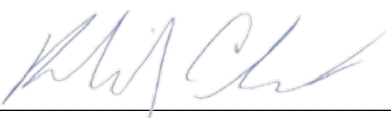
Dated: October 8, 2024  
Newark, New Jersey



**RULE 4:5-1 CERTIFICATION**

I certify, to the best of my information and belief, that the matter in controversy in this action involving the aforementioned violations of the CFA. N.J.S.A. 56:8-1 to -229, is not the subject of any other action pending in any other court of this State. I further certify, to the best of my information and belief, that the matter in controversy in this action is not the subject of a pending arbitration proceeding in this State, nor is any other action or arbitration proceeding contemplated. I certify that there is no other party who should be joined in this action at this time.

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiffs

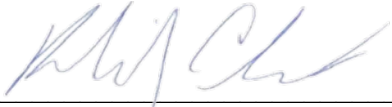
By:   
\_\_\_\_\_  
Kashif T. Chand  
Deputy Attorney General

Dated: October 8, 2024  
Newark, New Jersey

**RULE 1:38-7(c) CERTIFICATION OF COMPLIANCE**

I certify that confidential personal identifiers have been redacted from documents no submitted to the court, and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiffs

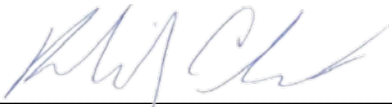
By:   
Kashif T. Chand  
Deputy Attorney General

Dated: October 8, 2024  
Newark, New Jersey

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:25-4, Kashif T. Chand, is hereby designated as trial counsel on behalf of Plaintiffs.

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiffs

By:   
Kashif T. Chand  
Deputy Attorney General

Dated: October 8, 2024  
Newark, New Jersey