

**IN THE COURT OF COMMON PLEAS FOR
ALLEGHENY COUNTY, PENNSYLVANIA**

COMMONWEALTH OF PENNSYLVANIA,	:	CIVIL ACTION
OFFICE OF ATTORNEY GENERAL,	:	
By Attorney General David W. Sunday, Jr.,	:	EQUITY
	:	
Plaintiff,	:	
	:	
v.	:	GD No.
	:	
TIKTOK INC., TIKTOK LTD., TIKTOK PTE.	:	
LTD., TIKTOK USDS JOINT VENTURE LLC,	:	
BYTEDANCE LTD., AND BYTEDANCE INC.,	:	
	:	
Defendants.	:	
	:	

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally, or by attorney and filing, in writing, with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

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THIS IS NOT AN ARBITRATION CASE-

This case has been brought by the Commonwealth under the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. §§ 201-1, *et seq.*,

**AN ASSESSMENT OF DAMAGES HEARING
IS REQUIRED**

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LTD., TIKTOK USDS JOINT VENTURE LLC, :
BYTEDANCE LTD., AND BYTEDANCE INC., :

Defendants. :

COMPLAINT

Filed on Behalf of Plaintiff:

COMMONWEALTH OF
PENNSYLVANIA, OFFICE OF
ATTORNEY GENERAL

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	:	
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	:	

COMPLAINT

AND NOW, comes the Commonwealth of Pennsylvania, Office of Attorney General, by Attorney General David W. Sunday, Jr. (hereinafter “Commonwealth” or “Plaintiff”), and brings this action pursuant to the Unfair Trade Practices and Consumer Protection Law, 73 P.S. § 201-1, *et. seq.* (hereinafter “Consumer Protection Law”), which authorizes the Attorney General to bring an action in the name of the Commonwealth of Pennsylvania, to restrain unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce declared unlawful by Section 201-3 of the Consumer Protection Law.

The Commonwealth has reason to believe that TikTok Inc., TikTok LTD., TikTok PTE. LTD., TikTok USDS Joint Venture LLC, Bytedance LTD., and Bytedance Inc., (collectively, “Defendants”) are using, have used or are about to use methods, acts or practices declared unlawful by Section 201-3 of the Consumer Protection Law; and, that citizens of the Commonwealth are suffering and will continue to suffer harm unless the acts and practices complained of herein are enjoined. The Commonwealth believes that the public interest is served by seeking before this Honorable Court a permanent injunction to restrain the methods, acts and practices of the

Defendants as set forth herein. Further, the Commonwealth requests restitution, injunctive relief, civil penalties, costs and other appropriate equitable relief as redress for violations of the Consumer Protection Law.

In support of this action the Commonwealth respectfully represents the following:

1. Pennsylvania children and teens are facing a crisis: the widespread, compulsive use of social media platforms specifically designed to be addictive. Parents, teachers, and experts in teen mental health agree that compulsive social media use is harmful to the mental and physical well-being of children and teens. To make matters worse, certain social media platforms misrepresent the nature and severity of the content on their platforms, which are rife with sexual, drug, and profane content.

2. TikTok¹ operates the TikTok social media platform, which is enormously popular among Pennsylvania teenagers.

3. TikTok markets its app as safe for users as young as 13 even though TikTok knows that its app carries a high risk of harm to minors and indeed does harm many minors.

4. TikTok has built one of the world's most popular social media platforms on the back of deception about the content its platform contains and the mental health problems exacerbated and caused in young people by its addictive design features, intended to profit off minor users by keeping them engaged on the platform as long as possible.

5. The Commonwealth brings this action pursuant to § 201-4 of the Pennsylvania Consumer Protection Law to restrain, by temporary or permanent injunction, any unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce

¹ This Complaint refers to Defendants TikTok Inc., TikTok Ltd., TikTok Pte. Ltd., TikTok USDS Joint Venture LLC, ByteDance Ltd., and ByteDance, Inc. collectively as "TikTok" throughout.

declared unlawful by § 201-2(4)(i) through (xxi) of the Consumer Protection Law and to obtain restitution and other relief, as this Court deems appropriate, pursuant to 73 P.S. § 201-1, *et seq.*

TikTok's Age-Rating Misrepresentations

6. TikTok is deceiving Pennsylvania consumers, particularly parents, by making false statements about the content available on its app in the Apple App Store and elsewhere. Until the Apple App Store age-rating system changed in late 2025, TikTok claimed a “12+” rating. Under Apple’s new rating system, TikTok claims a “13+” rating. TikTok has made specific representations in the App Store about its content, including that the TikTok app contains only:

- “Infrequent/Mild Sexual Content and Nudity”
- “Infrequent/Mild Profanity or Crude Humour”
- “Infrequent/Mild Mature/Suggestive Themes”
- “Infrequent/Mild Alcohol, Tobacco, or Drug Use or References”²

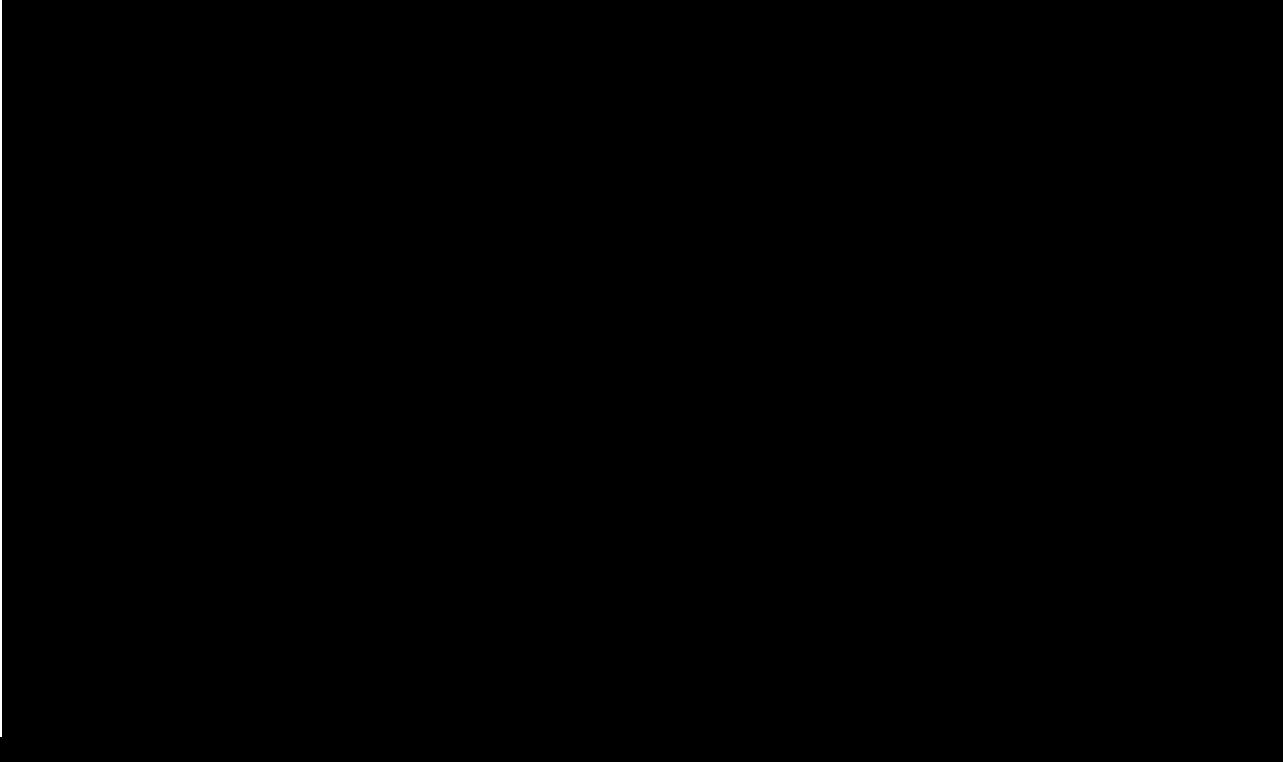
Currently, TikTok specifically represents in the App Store that its content is “infrequent” in all of the above categories.

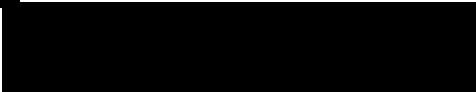
7. All of those representations are false. The TikTok app contains frequent and intense sexual content and nudity, profanity and crude humor, mature and suggestive themes, and alcohol, tobacco, and drug use and references. TikTok knew and intended to evade the parental controls on Apple devices when it rated its app “12+,” and now “13+.”

² *App Store Preview, TikTok- Videos, Music & Live, APPLE (2025),* <https://perma.cc/9Y47-JXCU>. [REDACTED]

8. If TikTok had correctly rated its app, it would have received a “17+” age rating under Apple’s old rating system, and “16+” or “18+” rating under the new system. These ratings would cause parental restrictions on phones to prevent many kids from downloading the app.

9. There is no doubt that TikTok has been misrepresenting itself in Apple’s App Store.



10.  TikTok continues to violate its App Store representations because content in every self-reported App Store category that TikTok claims to be “infrequent/mild” is in fact “frequent/intense.” Not only is this content available on the TikTok app, but TikTok’s algorithm recommends it to 13-year-old users. TikTok also makes similar claims about the age-appropriateness of its app in other app stores, in its Community Guidelines, and elsewhere, and these statements also mislead and deceive Pennsylvania consumers.

TikTok's App Is Intentionally Addictive

11. TikTok has also knowingly designed its app to be addictive to children and teens; created app features that prey upon young people's unique psychological vulnerabilities; and overridden young people's autonomy to decide how much time to spend on TikTok's platform through mechanisms that encourage compulsive use.

12. Addiction is TikTok's business model. TikTok depends on maximizing advertising revenue, so, predictably, it seeks to keep users on its platform for as long as possible—to show those users more ads and to use their data to sell more targeted advertising opportunities. To achieve that goal, TikTok employs a number of harmful addictive-by-design features specifically targeted and tailored to exploit, manipulate, and capitalize on the developing brains of young users. TikTok does this by harvesting its young users' personal data to identify—and then exploit for advertising revenue—vulnerabilities unique to each young user. At the same time, rather than disclosing its platform's harms and potential harms to young users or their parents, TikTok misleads the public about the ways its platform has harmed—and is continuing to harm—children and teens.

13. Internally, TikTok has known for years that excessive, compulsive, and addictive use of its platform is harmful to children and teenagers. Its executives admit that “[t]he product in itself has baked into it compulsive use”³ and that the algorithm might impact young users' opportunities to sleep, eat, and interact with others.⁴ Despite its full knowledge of the potential for serious harm, including sleep deprivation, depression, anxiety, self-harm, suicide, and death, TikTok deliberately and successfully targets its product to minors as its core demographic. As a

3 TT-MS-AG-000285717, at 51:42.

4 TT-MS-AG-000285717, at 49:24.

result, young American users utilize the TikTok platform at extremely high rates for long periods of time and suffer because of it.

14. Outside the United States, by contrast, TikTok’s parent company, Defendant ByteDance Ltd., actively strives to protect children from those harms. For example, it provides a different version of TikTok that reduces the risk of harm from platform design to minors, or young users. TikTok has the ability to take similar measures to protect young users across the United States, but it chooses not to. Instead, in the U.S. TikTok specifically targets young users with an algorithm and platform features designed to keep them on its platform as long as possible. TikTok’s executives and employees admit that they target young Americans, because “[t]eenagers in the U.S. are a golden audience.”⁵

15. TikTok does not tell Pennsylvania users or their parents that it intentionally implemented “coercive design tactics”⁶ that manipulate young users to increase their habitual use of the platform, intentionally exploiting young users’ inability to self-regulate. Nor does TikTok disclose what its executives and employees know about the harms caused by increased screen time: that “compulsive usage correlates with a slew of negative mental effects like loss of analytical skills, memory formation, contextual thinking, conversational depth, empathy, and increased anxiety” and that it “interferes with essential personal responsibilities like sufficient sleep, work/school responsibilities, and connecting with loved ones.”⁷

5 Paul Mozur, *Chinese Tech Firms Forced to Choose Market: Home or Everywhere Else*, N.Y. TIMES (Aug. 9, 2016), <https://bit.ly/4hceisi>.

6 See TT-MS-AG-000229217, at p. 11.

7 TT-MT-AG-000245170, at -176.

16. In response to criticism, TikTok implemented certain tools that it claims help users reduce the time they spend on the platform and other harms caused by the algorithm.⁸ But TikTok’s representations regarding these tools are misleading and false: TikTok knows that these measures are ineffective, either because only a tiny percent of its users actually use those tools; because the tools do not work as advertised; or because the tools do not meaningfully reduce users’ time spent on TikTok or prevent other harms.

PARTIES

17. The Commonwealth of Pennsylvania, through its Attorney General, is authorized to initiate proceedings in the public interest to restrain unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce, seek restitution, and obtain any other relief, as this Court deems appropriate. 73 P.S. § 201-1, *et seq.*

18. Defendant TikTok Inc. is a for-profit entity incorporated in California. It operates a social media application and platform known as “TikTok.” TikTok Inc. is headquartered at 5800 Bristol Pkwy., Culver City, CA 90230-6696. TikTok Inc. has a valuation of at least \$50 billion. TikTok Inc. made nearly \$4 billion in revenue in 2021 and an estimated \$10–12 billion in 2022.

19. Defendant TikTok Ltd. is incorporated in the Cayman Islands and wholly owned by ByteDance Ltd. TikTok Ltd. is the parent company of wholly owned U.S. subsidiaries TikTok Inc. and TikTok Pte. Ltd. TikTok Ltd. is listed in the App Store as the entity offering the TikTok app.

20. Defendant TikTok Pte. Ltd. is headquartered at 1 Raffles Quay, #26-10, South Tower, Singapore 048583. TikTok Pte. Ltd. is nominally listed in the Apple App Store as the

8 TT-MS-AG-000229217.

“Seller” of the TikTok app and in the Microsoft Store as having “[p]ublished” the TikTok app, and in the Google Play Store beneath the name of the TikTok app, without further description.

21. Defendant ByteDance Inc. is a for-profit entity incorporated in Delaware. ByteDance Inc. is headquartered at 250 Bryant St., Mountain View, CA 94041. ByteDance Inc. is wholly owned by ByteDance Ltd.

22. Defendant ByteDance Ltd. is a multinational internet technology holding company and is a parent company of TikTok Inc., TikTok Ltd., TikTok Pte. Ltd., and ByteDance Inc. It is headquartered in Room 503 5F, Building 2, 43 North Third Ring West Road, Beijing 100086 China and incorporated in the Cayman Islands, where it is registered at P.O. Box 309, Ugand House, South Church Street, George Town, KY1-1104, Cayman Islands.. ByteDance Ltd. is valued at more than \$400 billion and reported \$58 billion in revenue in 2021.

23. Defendant TikTok USDS Joint Venture LLC is a Delaware limited liability company and successor entity to some portion of TikTok’s U.S. operations. TikTok USDS Joint Venture LLC was established in January 2026 in response to a government-ordered divestment of ByteDance Ltd.’s ownership of TikTok’s U.S.-based operations.⁹ “ByteDance retains 19.9% of the Joint Venture.”¹⁰ Defendants have stated that TikTok USDS Joint Venture LLC will continue TikTok’s operations in the United States.¹¹ Defendants have further specified that TikTok USDS Joint Venture LLC “will retrain, test, and update the content recommendation algorithm on U.S.

⁹ *TikTok USDS Joint Venture LLC Established in Compliance with U.S. Regulatory Requirements*, TIKTOK (Jan. 22, 2026), <https://perma.cc/524F-CJG9>.

¹⁰ *Id.*

¹¹ *Id.*

user data” and “will safeguard the U.S. content ecosystem and have decision-making authority for trust and safety policies and content moderation.”¹²

24. Some portion of TikTok’s U.S.-based employees were transitioned to work for TikTok USDS Joint Venture LLC.¹³ TikTok’s CEO Shou Zi Chew also serves on TikTok USDS Joint Venture LLC’s board of directors.¹⁴ And the CEO of TikTok USDS Joint Venture LLC, Adam Presser, previously held executive-level roles at TikTok and TikTok U.S. Data Security Inc.¹⁵

25. TikTok USDS Joint Venture LLC continues the same business operations and maintains continuity of the same business enterprise, including substantially the same employees, customers, and business purpose. It had actual or constructive notice of Plaintiff’s claims prior to or at the time of the restructuring transactions, including through the filing of this lawsuit and subsequent public filings.

26. There is no separation between and among the ByteDance and TikTok Defendant entities. ByteDance Ltd. exercises control over TikTok Inc., TikTok Ltd., TikTok Ptd. Ltd., TikTok U.S. Data Security, and ByteDance Inc., which are its alter egos. ByteDance Ltd. created TikTok’s algorithm, which still belongs to it.¹⁶ ByteDance Ltd. has played “a role in the hiring of

12 *Id.*

13 Dan Whateley, *TikTok is Splitting its US Staff Into Different Entities, and It Shows What ByteDance Will Still Control After the Divestment*, BUSINESS INSIDER (Jan. 8, 2026), <https://perma.cc/SW23-VGTV>.

14 *Supra*, n.9.

15 *Id.*

16 Letter from Shou Zi Chew to U.S. Senators at 4 (June 30, 2022), <https://perma.cc/C96W-V5JH> (“June 2022 Letter”); Zhou Xin & Tracy Qu, *TikTok’s algorithm not for sale, ByteDance tells US*, SOUTH CHINA MORNING POST (Sep. 13, 2020), <https://bit.ly/3Uje9HQ>.

key personnel at TikTok.”¹⁷ High-level ByteDance Ltd. employees serve in dual roles for ByteDance Ltd. and other TikTok entities, including TikTok Defendants.¹⁸ In April 2021, TikTok’s current CEO, Shou Zi Chew, was named as CEO of TikTok while also serving as CFO of ByteDance Ltd.¹⁹ He reports to the CEO of ByteDance Ltd. Former TikTok and ByteDance employees confirm that ByteDance Ltd. exercises functional control over other TikTok entities and their employees.²⁰

27. TikTok’s Trust and Safety teams are responsible for developing safety and well-being policies for the TikTok app, creating and implementing safety and parental control features, and reviewing and investigating problematic content on the app. Those teams have reported to ByteDance executives.²¹



28. Employees can use a TikTok and a ByteDance email address interchangeably, and both email addresses use a single inbox. One former TikTok employee reported to *Forbes* that

17 June 2022 Letter, *supra*, n.18, at 5; *see also* Drew Harwell & Elizabeth Dwoskin, *As Washington wavers on TikTok, Beijing exerts control*, WASH. POST (Oct. 30, 2022), <https://wapo.st/3VjMvLV> (managers in Beijing are “even the final decision-makers on human resources matters, such as whether an American employee can work remotely”).

18 Decl. of Vanessa Pappas ¶ 1, *TikTok Inc. v. Trump*, No. 20-cv-02658 (D.D.C. Sep. 23, 2020), ECF No. 15-3; Decl. of Roland Cloutier ¶¶ 1–2, *TikTok Inc. v. Trump*, No. 20-cv-02658 (D.D.C. Sep. 23, 2020), ECF No. 15-2).

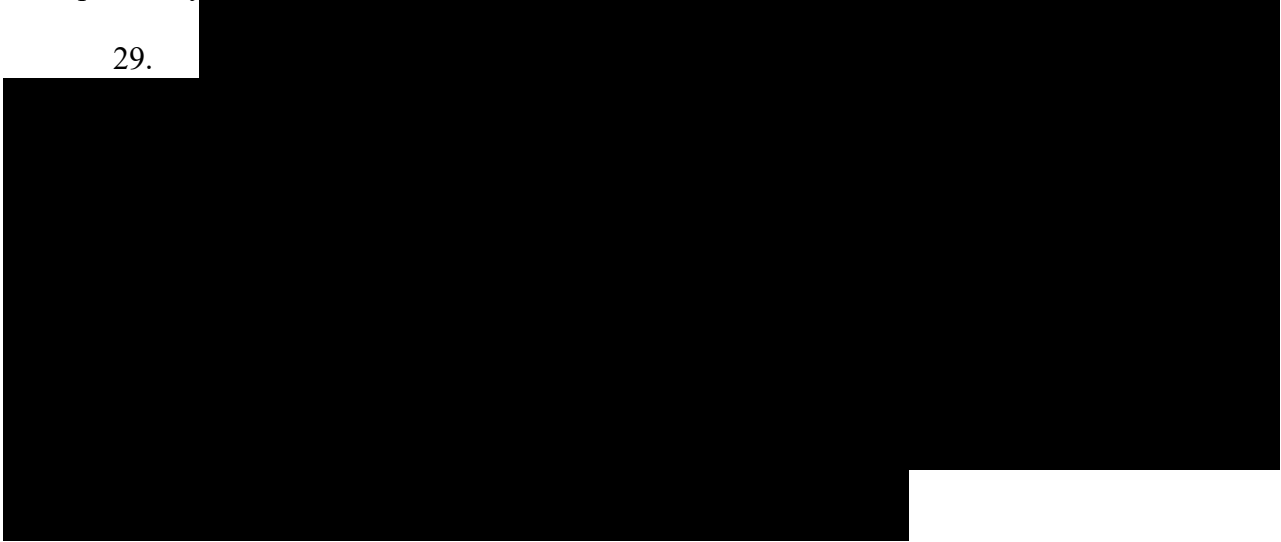
19 *TikTok Names CEO and COO*, TIKTOK (Apr. 30, 2021), <https://bit.ly/3OVyvWh>; Ryan Mac & Chang Che, *TikTok’s C.E.O. Navigates the Limits of His Power*, N.Y. TIMES (Sep. 16, 2020), <https://nyti.ms/3OT6grk>.

20 Emily Baker-White, *TikTok is Bleeding U.S. Execs Because China is Still Calling the Shots*, FORBES (Sep. 21, 2022), <https://bit.ly/3XTSnNF>; Emily Baker-White, *A China-Based ByteDance Team Investigated TikTok’s Global Security Chief, Who Oversaw U.S. Data Concerns*, FORBES (Oct. 25, 2022), <https://bit.ly/3B3v5Lt>; Salvador Rodriguez, *TikTok Insiders Say Social Media Company is Tightly Controlled by Chinese Parent ByteDance*, CNBC (June 25, 2021), <https://cnb.cx/3NYLiXS>.

21 *See* Harwell & Dwoskin, *supra*, n.17 (emphasis added).

TikTok paychecks showed ByteDance as the drawer; another reported that TikTok employees' W-2s reported ByteDance as their employer.

29.



JURISDICTION AND VENUE

30. This is an action for statutory and equitable relief under the Unfair Trade Practices and Consumer Protection Law (UTCPL), 73 P.S. Section 201-1, *et seq.*

31. TikTok's violations occurred in or affect more than one district in the Commonwealth of Pennsylvania, including Allegheny County.



32. Venue is proper in this Court because allegations in this Complaint establish that the cause of action accrued in Allegheny County.

33. This Court has personal jurisdiction over TikTok under Pennsylvania's long-arm statute, 42 Pa. C.S. § 5322, because TikTok has substantial contacts in Pennsylvania.

34. TikTok has millions of users in Pennsylvania, including tens of thousands of users who are under 16 years old. TikTok generates millions of dollars of annual revenue by making TikTok available to users in Pennsylvania.

35. Defendants use data collected from Pennsylvania users, including location-based data, to serve content to those users in Pennsylvania.

For example, if a user's location reveals she is in Pennsylvania, it may suggest content about the Penn State football.

36. TikTok also serves users in Pennsylvania location-specific advertisements. For example, a TikTok app user might see an advertisement for a local florist based on his location in Bloomsburg, Pennsylvania.

37. TikTok compensates users in Pennsylvania for content that they create and post on the TikTok app.²⁸

38. When Pennsylvania consumers register to use the TikTok app, they enter a contract with TikTok, known as the Terms of Service. The contract is supported by consideration:

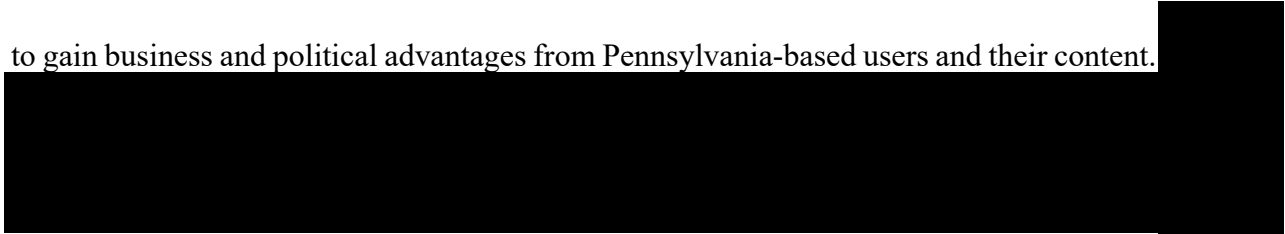
²⁸ *TikTok Creator Fund*, TIKTOK, <https://perma.cc/T84X-9B9L>; *TikTok Creator Rewards Program*, TIKTOK, <https://perma.cc/QT5H-B42D>.

Pennsylvania users gain access to the TikTok app and platform, and in consideration for that benefit, they “acknowledge and agree that [TikTok] may generate revenues, increase goodwill or otherwise increase [its] value from your use of the [TikTok] Services” (among other things).²⁹ The Terms of Service explicitly allow TikTok to collect and use the geographic information of Pennsylvania consumers: Pennsylvania users grant TikTok contractual permission to “automatically collect certain information,” including “your IP address” and “geolocation-related data,” and TikTok informs users that it may link them with their offline activity, like where a user shops in-person.³⁰ TikTok has entered such contracts with millions of Pennsylvania consumers.

39. TikTok allows Pennsylvania users to buy monetary “gifts,” which they can send to other users. TikTok Shop also allows users to shop for and purchase items inside the TikTok app. Those items will be shipped to the user, including users within Pennsylvania. TikTok directly fulfills some of those purchases.

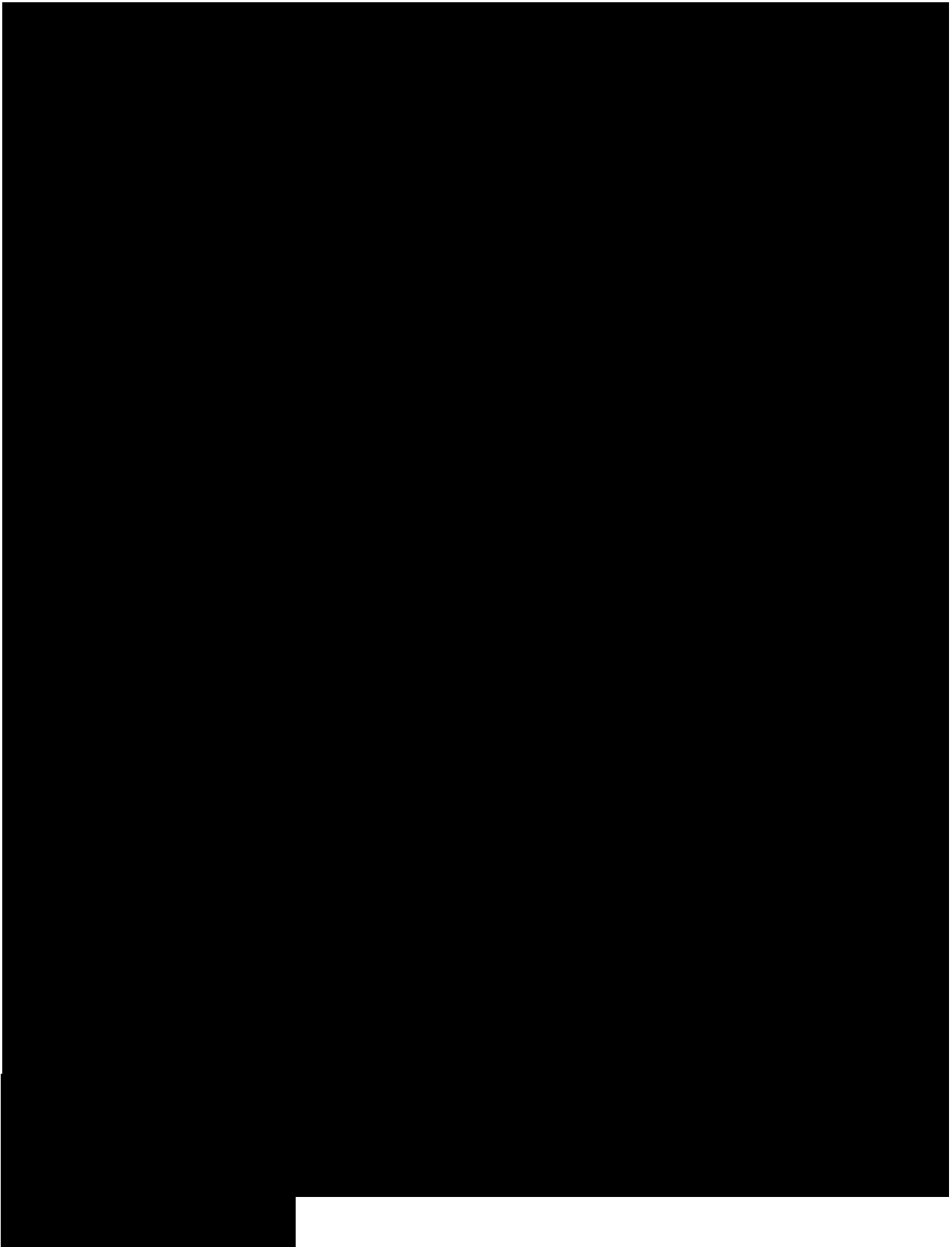
40. Defendants have availed themselves of the benefit of transacting business in Pennsylvania through the marketing, sale, and operation of a well-known social media and advertising network. Defendants are aware of their presence in Pennsylvania and the financial rewards they receive from operating within Pennsylvania. Defendants can attribute, at a minimum, millions of dollars in revenue to activities in the Commonwealth of Pennsylvania.

41. Defendants have targeted Pennsylvania as a market for the TikTok app and sought to gain business and political advantages from Pennsylvania-based users and their content.



29 *Terms of Service*, TIKTOK (last updated Nov. 2023), <https://perma.cc/EHE8-FXPG>.

30 *Privacy Policy*, TIKTOK (last updated Mar. 21, 2023), <https://perma.cc/CH6D-NXYQ> (The Terms of Service incorporate the Privacy Policy).



42. The conduct described in this Complaint and the harm it causes arise from TikTok’s activities directed to Pennsylvania and to TikTok users in Pennsylvania.

FACTUAL ALLEGATIONS

43. The TikTok app is a social media platform that centers on short videos created and uploaded by users, often set to popular music, which TikTok makes available in its music library. The TikTok app is available as an application to download on smartphones and tablets, and most users interact with the TikTok app that way. Users can download the TikTok app from the Apple App Store, the Google Play Store, or the Microsoft Store. The TikTok app was the most downloaded app globally in 2022.

44. To register to use the TikTok app, the user must provide a birthday. A user can access the regular TikTok app only if the birthday provided indicates that the user is at least 13 years old. This means that TikTok knows which users have told TikTok they are 17 years old or younger.



45. A user lands on the TikTok app’s “For You Feed” when opening the app. The For You Feed is a never-ending stream of videos personalized for the user by TikTok’s algorithm. Arvind Narayanan, *Understanding Social Media Recommendation Algorithms*, KNIGHT FIRST AMENDMENT INSTITUTE, at 22–28 (2023), <https://perma.cc/697S-FMZB>.

46. Users of the TikTok app can also search for content on the TikTok app using keywords and hashtags. When a user types in the TikTok app’s search bar, the “Autocomplete” function will suggest search results.

47. TikTok permits users as young as 13 years old to create an account and access the TikTok app.

48. TikTok does not require any children users to obtain parental consent to create a TikTok account and access the TikTok app.

49. TikTok publishes “Community Guidelines,” a set of rules governing the content users are allowed to post on the TikTok app. TikTok relies on “content moderation” to police the Community Guidelines. Moderation is carried out through artificial intelligence and human moderators.



I. TikTok Misleads And Deceives Pennsylvania Users About Its Platform.

A. TikTok Misrepresents Its Platform In Apple’s App Store.

50. Apple requires developers submitting an app to be included in Apple’s App Store—like Defendants—to answer an age-rating questionnaire. Apple has said that apps that host user-generated content (like TikTok) “should share the age rating of the highest age rated creator content available in the app.”³¹ Apple alerts developers to the reality that “[w]e have lots of kids and teens downloading apps,” and that app developers like Defendants “have to do your part” to keep kids safe.³² Apple also tells developers to “[a]nswer the age rating questions in App Store Connect honestly so that your app aligns properly with parental controls.”³³ “If your app is mis-rated,” Apple warns, “customers might be surprised by what they get, or it could trigger an inquiry

31 *App Store Review Guidelines*, APPLE, <https://apple.co/3syB5el> (Apple currently states: “Creator apps must provide a way for users to identify content that exceeds the app’s age rating, and use an age restriction mechanism based on verified or declared age to limit access by underage users.”)

32 *Id.*

33 *Id.*

from government regulators.”³⁴ Apple also informs developers, “[Y]ou are responsible for complying with local requirements in each territory where your app is available.”³⁵

51. Apple’s age-rating questionnaire asked Defendants to describe the content available on the TikTok app in each of these categories: “Alcohol, Tobacco or Drug Use or References,” “Sexual Content or Nudity,” “Mature/Suggestive Themes,” and “Profanity or Crude Humor.” Based on the self-selected answers to these questions—“none,” “infrequent/mild,” or “frequent/intense”—Apple suggested an age-rating. Apple also offered every app developer (including TikTok) the option to self-select a higher age rating than the one Apple suggests.

52. TikTok self-selected the answer “infrequent/mild” for every category. By doing so, TikTok chose to have the following statements displayed on its page in the App Store:

- “Infrequent/Mild Profanity or Crude Humor”
- “Infrequent/Mild Mature/Suggestive Themes”
- “Infrequent/Mild Sexual Content and Nudity”
- “Infrequent/Mild Alcohol, Tobacco, or Drug Use or References”

App Store Preview, *supra* n.2.

53. Until Apple revised its age-rating system in late 2025, Defendants’ answers caused Apple to offer a “12+” age rating option. Apple defined apps with the “12+” age rating as apps that “may also contain infrequent mild language, frequent or intense cartoon, fantasy, or realistic violence, and infrequent or mild mature or suggestive themes, and simulated gambling, which may not be suitable for children under the age of 12.”³⁶ TikTok chose to rate its app “12+.”

34 *Id.*

35 *Id.*

36 *App Store Preview, Age Ratings, APPLE (2025)*, <https://perma.cc/DB4Q-X4RC>.

54. Under Apple’s prior age-rating system, the next higher (and highest) age rating was “17+.” Apple offered Defendants the option to choose this rating, but Defendants never did so. Apple defined apps with the “17+” age rating as apps that “may also contain frequent and intense offensive language; frequent and intense cartoon, fantasy, or realistic violence; and frequent and intense mature, horror, and suggestive themes; plus sexual content, nudity, alcohol, tobacco, and drugs which may not be suitable for children under the age of 17.”³⁷

55. In 2025, Apple revised the App Store’s age-rating options, which are now 4+, 9+, 13+, 16+, and 18+. Under this new system, TikTok self-selects the answer “infrequent” for the relevant content categories. By doing so, TikTok chooses to have the following statements displayed on its page in the App Store: “Infrequent” “Profanity or Crude Humor”; “Infrequent” “Mature or Suggestive Themes”; “Infrequent” “Sexual Content or Nudity”; “Infrequent” “Alcohol, Tobacco, Drug Use or References.”³⁸ Apple defines apps with the “13+” age rating as apps that “may contain instances of content not suitable for users under 13, including infrequent medical or treatment-focused content, references to alcohol, tobacco, or drug use, sexual content or nudity, realistic violence, or simulated gambling; or frequent contests, guns or other weapons, profanity or crude humor, horror or fear-themed content, or cartoon or fantasy violence.”³⁹ TikTok chooses to rate its app “13+.”

56. Under Apple’s new age-rating system, the next higher age rating is “16+.” Apple offered Defendants the option to choose this rating, but Defendants have not done so. Apple defines apps with the “16+” age rating as apps that “may contain instances of content not suitable

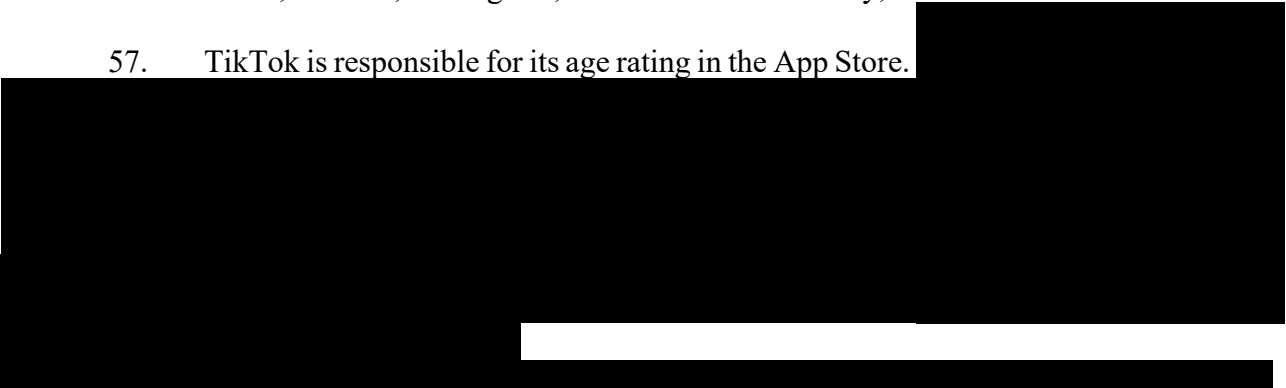
37 *Id.*

38 *App Store Preview*, TikTok- Videos, Music & Live, APPLE (2026), <https://perma.cc/9Y47-JXCU>.

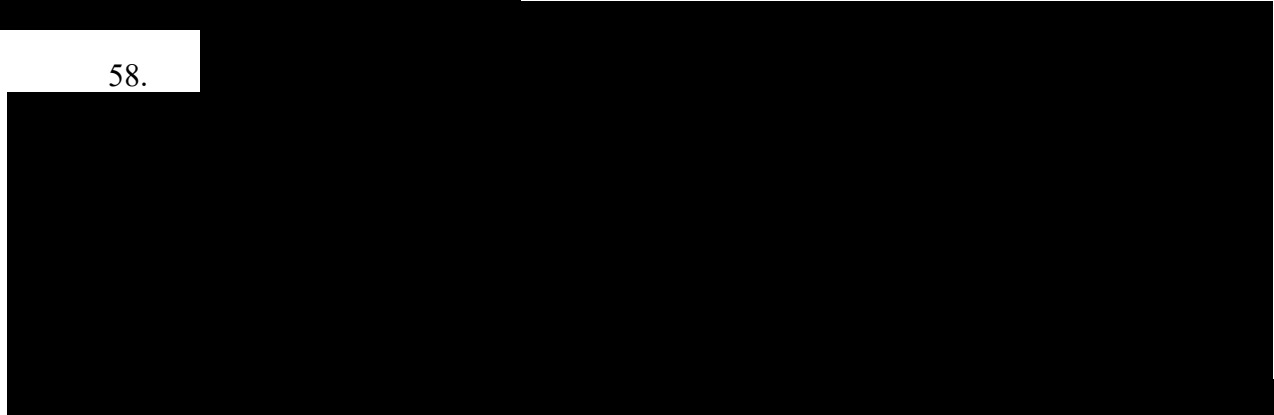
39 *App Store Preview*, Age Ratings, APPLE (2026), <https://perma.cc/6J7K-KSQ6>.

for users under 16, including unrestricted web access; or frequent mature or suggestive content, or medical or treatment-focused content.”⁴⁰ The next higher (and highest) age rating is “18+.” Apple offered Defendants the option to choose this rating, but Defendants have not done so. Apple defines apps with the “18+” age rating as apps that “may contain instances of content not suitable for users under 18, including through instances of gambling; or frequent simulated gambling, references to alcohol, tobacco, or drug use, sexual content or nudity, or realistic violence.”⁴¹

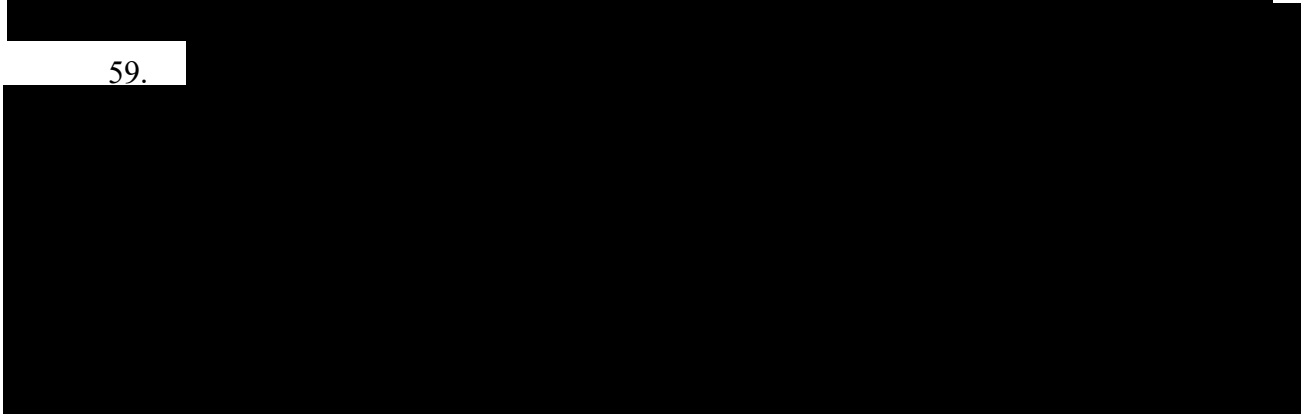
57. TikTok is responsible for its age rating in the App Store.



58.



59.



40 *Id.*

41 *Id.*

60.

61.

Defendants continued to improperly claim a “12+,” and now “13+,” rating for the TikTok app, because TikTok still contains frequent: profanity or crude humor; alcohol, tobacco, and drug use or references; sexual content or nudity; and mature/suggestive themes. TikTok also still contains intense: profanity or crude humor; alcohol, tobacco, and drug use or references; sexual content or nudity; and mature/suggestive themes.

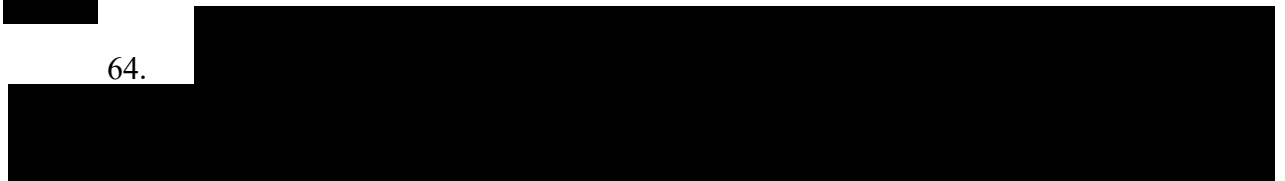
62. Pennsylvania’s own investigation has shown that these types of content are present in large quantities on the TikTok app and are accessible to 13-year-old users. *See infra* at ¶¶ 74,

86, 93, 96. Users are presented with this content in their algorithmically driven For You Feed without having searched for it, including users registered as only 13 years old. Users can also search for and find this content on the TikTok app when they are registered as only 13 years old. Videos containing these kinds of content receive millions—even hundreds of millions—of views on the TikTok app. Users who type only a few letters into the TikTok app’s search bar will be presented with search suggestions that lead to frequent and intense profanity; crude humor; alcohol, tobacco, and drug use and references; sexual content or nudity; and mature or suggestive themes.

63.



64.



[REDACTED]

65. TikTok uses content moderators to detect and remove content from its platform that violates its policies. But those efforts fail to limit minors' exposure to Apple's identified categories of content to "infrequent/mild" occurrences. That is largely for two reasons.

[REDACTED]

66.

[REDACTED]

67.

[REDACTED]

68.

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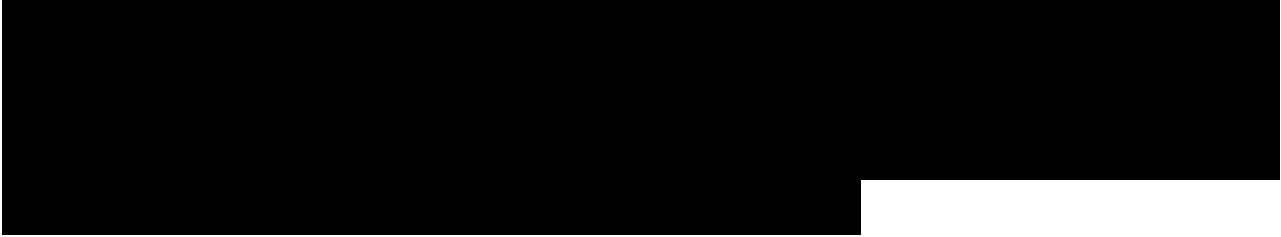
Profanity or crude humor.

70. Profanity on the TikTok app is neither infrequent nor mild.

71.



72. “Push notifications” are notifications that the TikTok app sends to users’ phones, usually inviting them to engage with content on the platform.



73. TikTok also exempts profanity—no matter how extreme—from its content restrictions if it appears in song lyrics. TikTok considers the use of profanity in song lyrics to be a mitigating factor that softens its intensity.

74. The Commonwealth’s own investigation using a test account reveals that videos containing profanity and crude humor appear frequently, are intense on the TikTok app, and are visible to minors. These are just a few of many examples:

- A video that says, “The giant horse cock weighs 11 pounds,” to which someone responds, “the fucking what?”
- A video of someone playing a video game with the text: “yo how tf do I ask my parents for a ball trimmer i’ve been using the kitchen scissors and haven’t washed them once.”
- A video in which someone lip syncs to the lyrics, “I don’t want yo nigga he needy, eating real good, ass fat, I’m greedy, Cute face, it remind you of Tweety, Ain’t shit sweet but this pussy he eating.”
- A video set the song lyrics: “Rest in peace my grandpa, he got fucked by my bazooka; finger in his butt while I’m sucking on his hookah. Kaboom. Kabow. Kaboom. I was in my room tryna fuck my little brother, then I heard my grandpa and it sounded like he nutted what dat is, what dat was; oh, it’s grandpa, I made him cum.”

75. Videos like these are readily available on the TikTok app, yet Defendants tell consumers in the App Store that “profanity or crude humor” is “infrequent/mild” on the platform. That is deception, a false promise, and a misrepresentation.

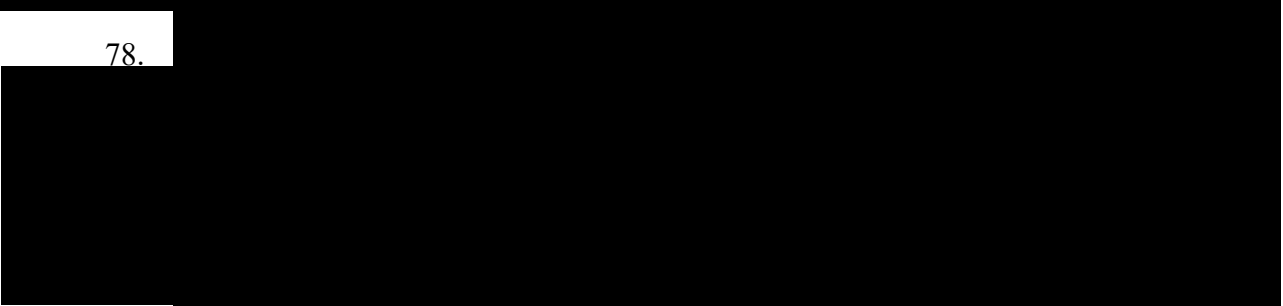
Alcohol, tobacco, and drug use or references.

76. Alcohol, tobacco, and drug use or references on the TikTok app are neither infrequent nor mild.

77.



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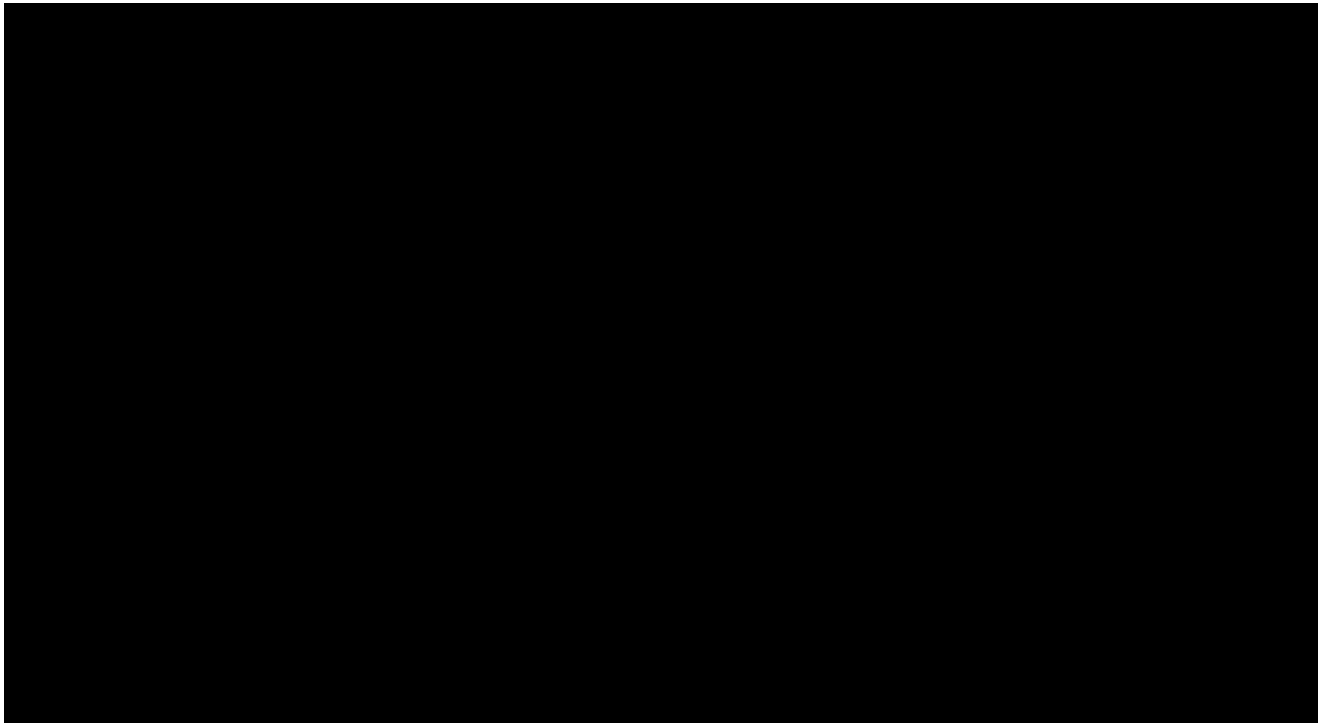
80.

81.

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83.

84.



86. The Commonwealth's own investigation using a test account reveals that alcohol, tobacco, and drug use or references appear frequently, are intense on the TikTok app, and are visible to minor users. These are just a few of many examples:

- A video with the text: "POV u try a line for ur first time" while a man pantomimes sniffing cocaine to the audio, "Spectacular, give me 14 of them right now."
- A girl pantomiming to audio saying: "Okay. Wow. First thought transcending the game." The text superimposed on the video reads: "me at 14 when i realized that if i pop a xan i can speed run thru the day AND not remember any of it," (referring to prescription Xanax). This video has more than 200,000 likes on TikTok.
- A video titled "Mad Dogs vs. a breathalyzer," in which a man blows a 0.0 on a breathalyzer, then drinks six Mad Dogs (a flavored fortified wine beverage) in short succession, then blows a 0.35 on the breathalyzer. A blood alcohol level of 0.40 is typically considered lethal. The video has nearly 50,000 likes on TikTok.
- A video with the text superimposed: "Date idea: I od in your arms while u say I love you on[e] last time." The abbreviation "od" stands for "overdose." The video appeared in the For You Feed and has over 46,000 likes.
- A video of a young man saying "If you're under the age of 21 and you drink every day, you're not an alcoholic. We're simply just young and turnt." The same text is superimposed on the video. The video has more than 200,000 likes on TikTok.

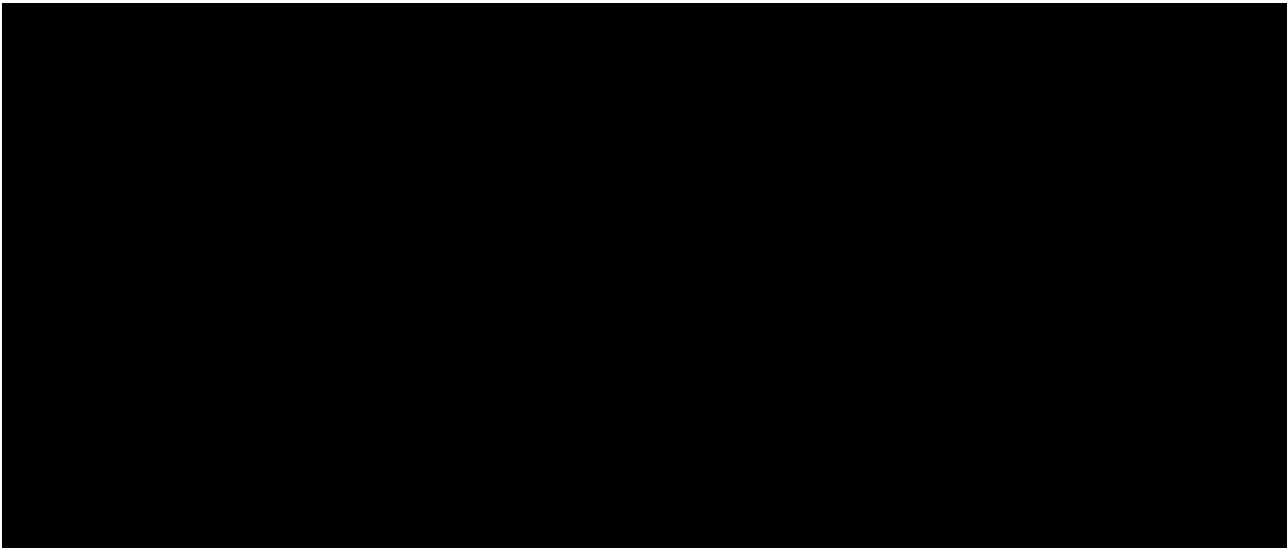
87. Even though videos like these are readily available on TikTok, Defendants tell consumers in the App Store that “alcohol, tobacco, and drug . . . references” are “infrequent/mild” on the platform. That is deception, a false promise, and a misrepresentation.

88.

89.

90.

91.



92. TikTok also contains an in-app browser that allows users to click on a link and view an external website without exiting TikTok. In the past, users have been able to use this feature to link to a search engine, then search for and view hard-core pornography—all without leaving the TikTok app. Young users have been able to use this feature to access hard core pornography through the TikTok app even if parental controls were enabled on their device and would otherwise have prevented the user from accessing this content on an ordinary web browser.

93. The Commonwealth’s own investigation using a test account revealed abundant sexual content on the TikTok app, including:

- A video of a woman with a blanket and a sex toy. Text on the video says: “When your toy dies so you have to use an alternative,” and the audio accompanying the video says: “Why the fuck this have to fucking happen to me right now? But they say when you change your perspective that’s when miracles happen.”
- A video of a woman wearing only transparent tights below the waist getting into a car. The floor of the car is covered in condoms; she opens one and puts it over a can of Pringles.
- Several scenes that depict the recipient of off-camera oral sex.

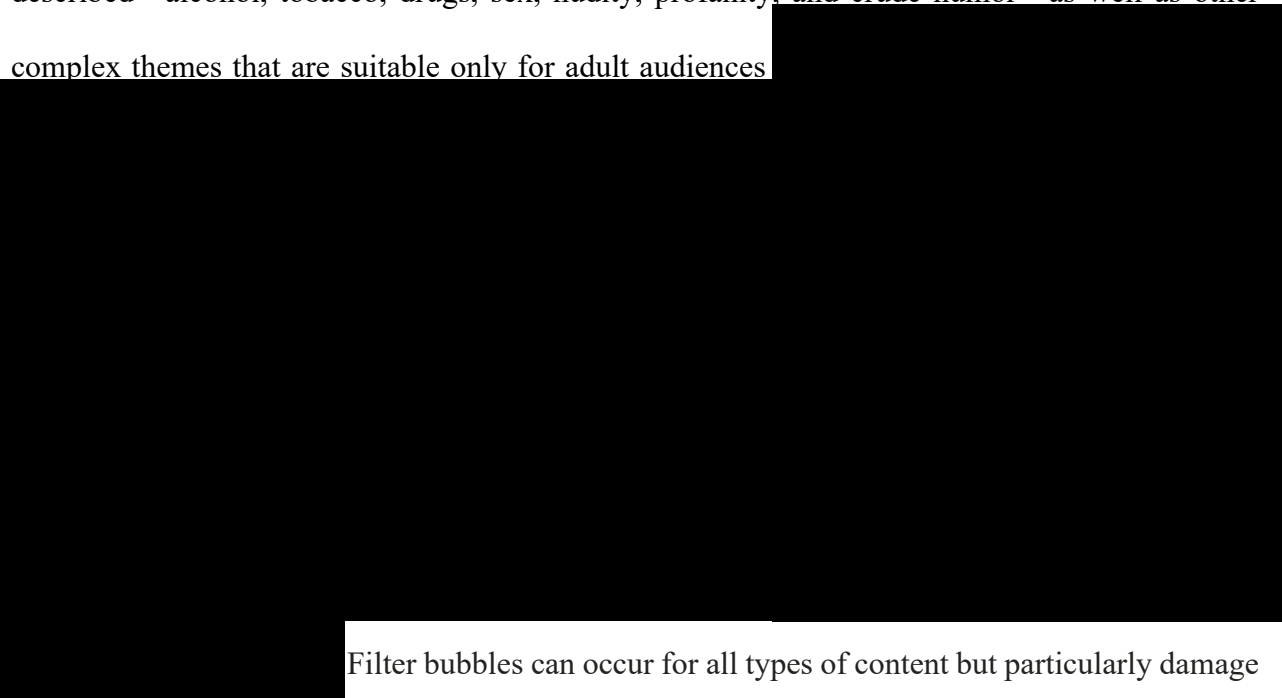
42 Content created by users in other countries is visible to U.S. users.

- A video that begins, “does sex feel different after removing my asshole?”
- An unedited scene from the R-rated movie, Logan, in which a woman in the backseat of a car says “hey, driver!” and flashes both exposed breasts to the limo driver.

94. Even though these videos and many others like them are readily accessible on the TikTok app, Defendants tell consumers in the App Store that “sexual content and nudity” is “infrequent/mild” on the platform. That is deception, a false promise, and a misrepresentation.

Mature/suggestive themes

95. “Mature/suggestive themes” include content related to the topics already described—alcohol, tobacco, drugs, sex, nudity, profanity, and crude humor—as well as other complex themes that are suitable only for adult audiences



Filter bubbles can occur for all types of content but particularly damage young users when they concern mature or suggestive themes, which can be psychologically

harmful.

96. The Commonwealth's own investigation using a test account reveals that videos containing mature and suggestive themes often occur on the TikTok app and are intense. These are just a few of many examples:

- A video that narrates a scene in which “the killer ripped off the wealthy woman’s coat,” lets him “tie her arms and legs,” but then realizes his murderous intent when he injects her with “pufferfish venom,” and murders her. The caption of the video is “Kid movies ...”
- A video spontaneously offered on the For You Feed with the text: “when my parents threaten to take away my phone but I know something I can take that they wont get back.”
- A video spontaneously offered on the For You Feed with the text “I really need toxic weight loose motivation” [sic] – the video has over one million likes. The video’s audio says: “I have to! Why? Because if I don’t, it means that all of the damage I got isn’t good damage, it’s just damage.”
- Another For You Feed video with the text “Hey twin, Would u be mad if I did this?” over first-person perspective animation that appears to depict a person taking their own life with a gun.
- A video with the text: “yes girl, skip lunch, dye your hair, pierce your ears, ghost your friends, get your nails done, sneak out, do your lashes, do your makeup, but you’ll still” and set to an audio track titled “Hate Yourself.”
- A video of a woman saying, direct to camera: “Do you need some skinny motivation today? I’m going to be the one to give it to you. Pretend like you’re eating next to Bella Hadid. Do you think Bella Hadid is ordering mozzarella sticks because it’s ‘all about balance’? Sorry to break it to you, but nobody accidentally looks like that. The girls you want to look like aren’t door dashing Crumbl at midnight. Do you think runway models are treating themselves every other night? Come on. We both know that’s not happening. You’re trying to look like women who absolutely do not eat like you.”
- A video of a very thin girl and the text “nothing tastes as good as skinny feels.”
- A video with the text, “I carved your initial into my thigh,” with the audio, “What you don’t understand is that I am crazier! That is not something to be fucking proud of, Cassie!”

97. Even though these videos and many others like them are readily available on the TikTok app, Defendants tell consumers in the App Store that “mature/suggestive themes” are “infrequent/mild” on the platform. That is deception, a false promise, and a misrepresentation.

C. Google Play And Microsoft Stores

98. Defendants also make the TikTok app available in the Google Play and Microsoft Stores. To do so, TikTok is required to answer age-rating questions by self-reporting details about the content and features available on the TikTok app. Defendants respond to these age-rating questions in a way that allows them to claim a “T for Teen” age rating for the TikTok app. TikTok knows and intends that Google and Microsoft will convey the “T” for “Teen” age rating to consumers on TikTok’s behalf. A “T” for “Teen” rating is defined as: “Content is generally suitable for ages 13 and up. May contain violence, suggestive themes, crude humor, minimal blood, simulated gambling and/or infrequent use of strong language.”⁴³ By contrast, an “M” for “Mature” rating is defined as: “Content is generally suitable for ages 17 and up. May contain intense violence, blood and gore, sexual content and/or strong language.”⁴⁴

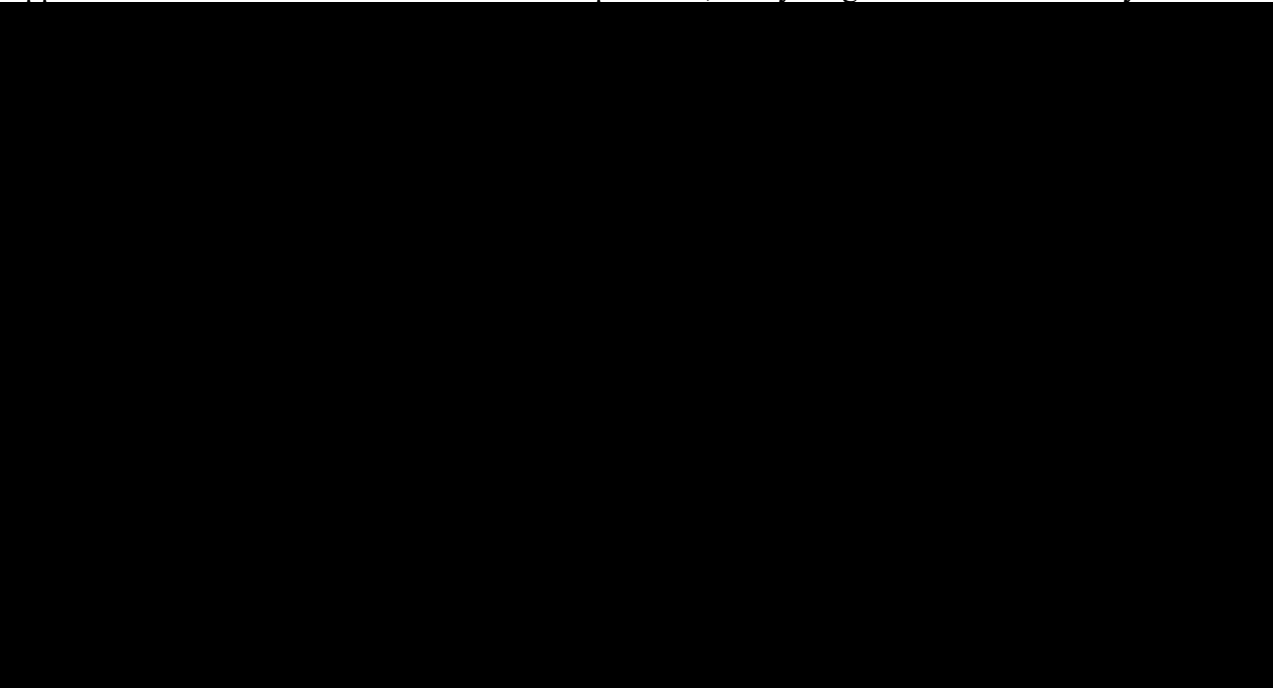
99. As already described, the content on the TikTok app is not “generally suitable for ages 13 and up” and does not include only the “infrequent use of strong language.” The TikTok app contains “intense . . . sexual content and/or strong language.” TikTok’s choice to claim a “T for Teen” rating in the Google Play and Microsoft Stores is a deception, a false promise, and a misrepresentation. TikTok can accurately claim only an “M for Mature” rating in the Google Play and Microsoft Stores.

⁴³ *Content ratings for apps and games*, GOOGLE PLAY, <https://bit.ly/40NbJ95>.

⁴⁴ *Id.*

B. TikTok Live

100. TikTok also has a feature called “TikTok Live,” which allows users to broadcast live videos to other users. TikTok promotes some Live content through a feature called “TopLives,” which recommends Live video content to users. High-risk content is more likely to appear in Live videos than on the rest of the platform, and young users are more likely to see it.



All TikTok users—even those under 18—can watch Live content on TikTok.

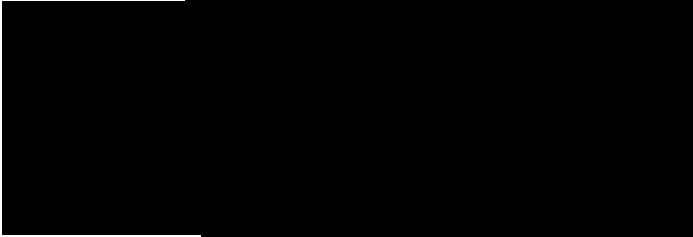
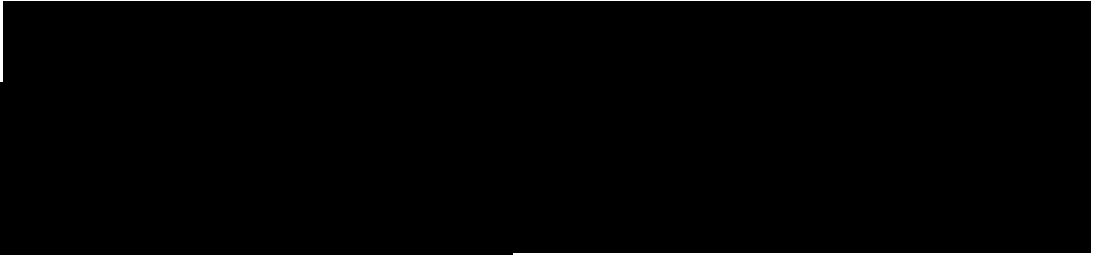
D. TikTok’s Restricted Mode Is Deceptive

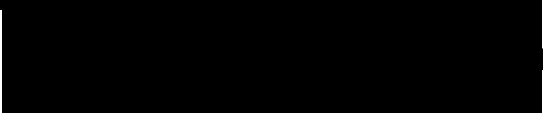
101. TikTok offers “Restricted Mode” to Pennsylvania consumers:

Restricted Mode on TikTok limits exposure to content that may not be comfortable for everyone, such as content that contains mature or complex themes. Some features are unavailable if you use Restricted Mode, including access to the Following feed, going LIVE, and gifting on LIVE. Restricted Mode can be turned on or off any time. Parents and guardians can also manage Restricted Mode for their teens through Family Pairing.⁴⁵

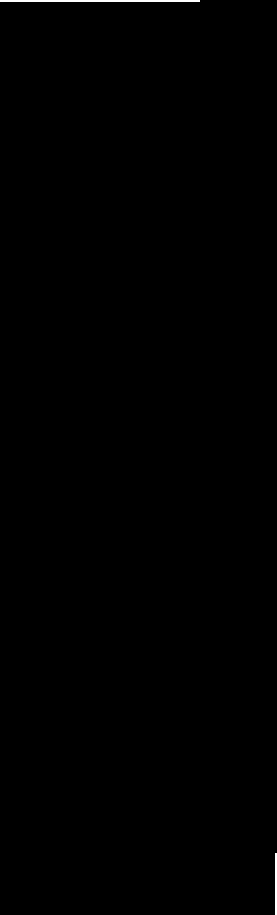
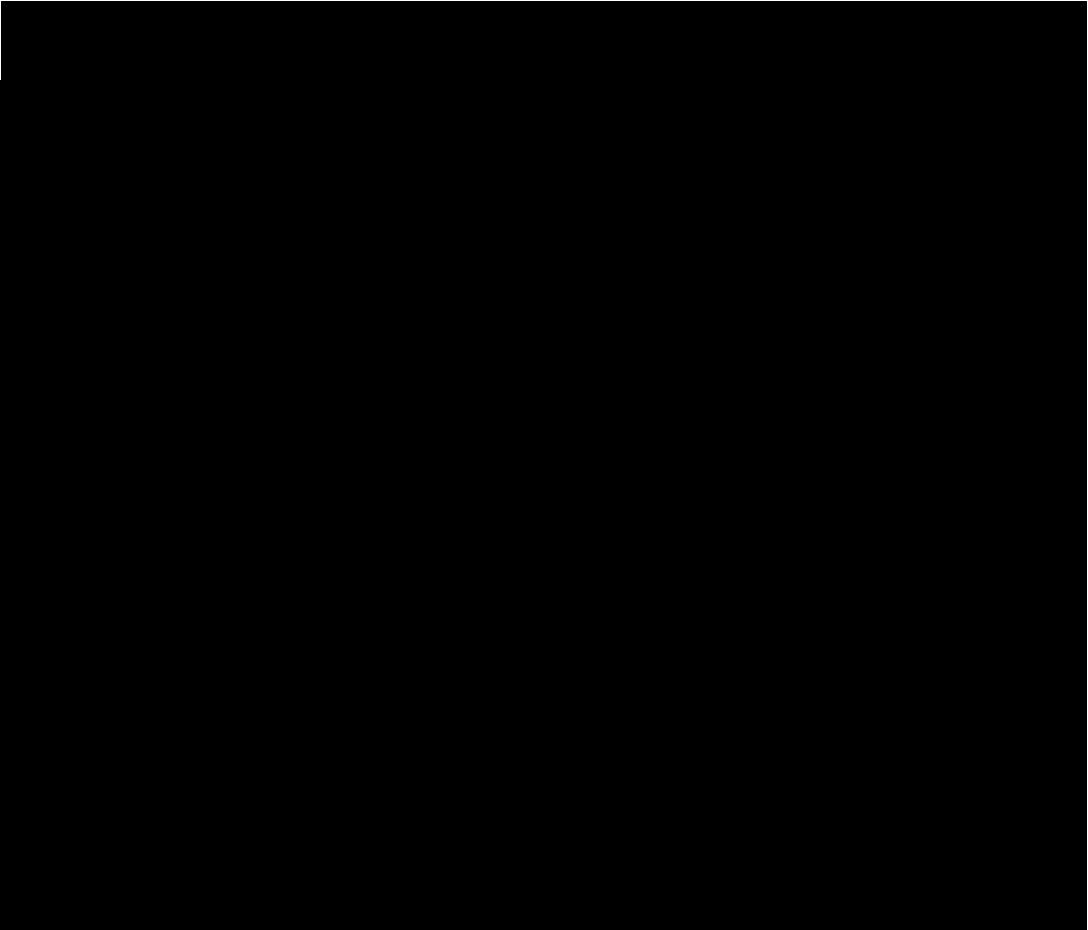
45 *Restricted Mode*, TIKTOK SUPPORT, <https://perma.cc/V7LL-5XXF>.

102.

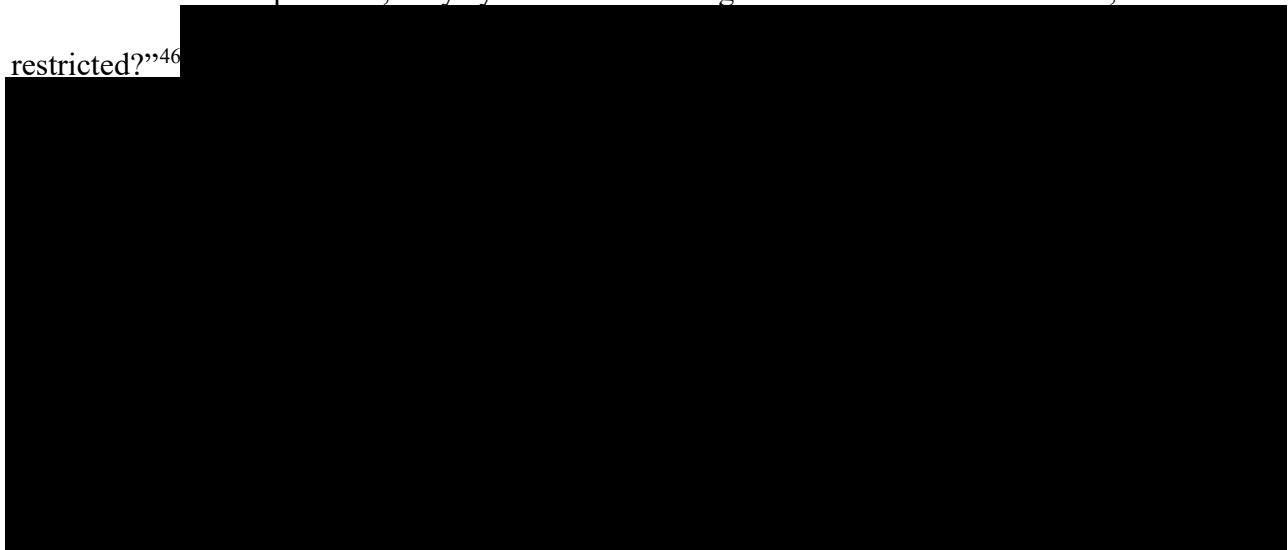


103.  Restricted Mode does not work and has never worked the way TikTok claims it does. When Restricted Mode is enabled, users—even users logged in as 13-year olds—can see mature content (sexual content, nudity, mature and suggestive themes, profanity, and content related to alcohol, tobacco and drugs) on the TikTok app, including content served in the algorithmically-driven For You Feed where users have not explicitly requested it.

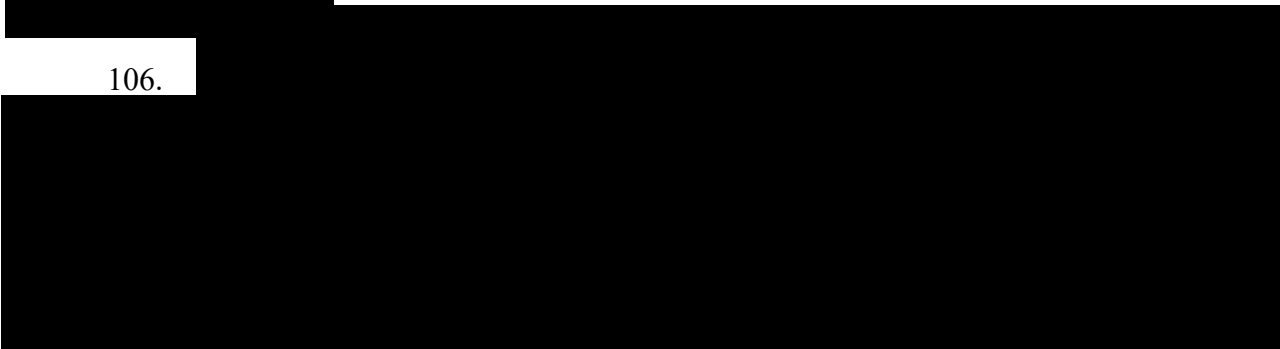
104.



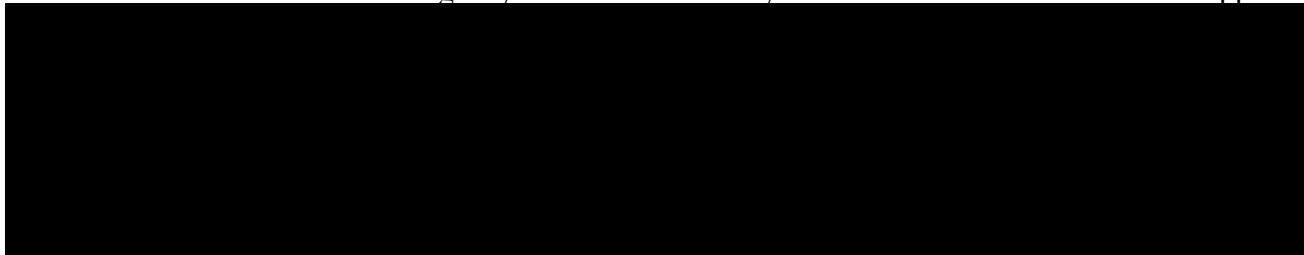
105. In a 2021 *Good Morning America* segment about Restricted Mode, the host asked based on her own experience, “My eyeballs are bleeding . . . if that’s Restricted Mode, what’s not restricted?”⁴⁶



106.



107. Yet TikTok touts Restricted Mode as a safety feature without warning parents that Restricted Mode does not meaningfully restrict the visibility of mature content on the TikTok app.



⁴⁶ GOOD MORNING AMERICA, *TikTok updates privacy protections for teen users*, at 2:06–2:17, (YouTube, Jan. 13, 2021), <https://bit.ly/40Hsvql>.

⁴⁷ Dep. Tr. of Tracy Elizabeth at 208:1–7, *Indiana v. TikTok Inc.*, No. 02D02-2212-PL-000400 (Allen Cnty. Super. Ct. Feb. 24, 2023)



108. TikTok currently tells users that “[y]ou shouldn’t see mature or complex themes” on the TikTok app with Restricted Mode enabled, including “[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 substances/drugs, [and] [e]xplicit references to mature or complex themes that may reflect personal experiences or real-world events that are intended for older audiences.”⁴⁸ That is a deception, a false promise, and a misrepresentation.

109. Mature content is readily available when Restricted Mode is enabled, and TikTok knows it.

E. TikTok’s Family Pairing Is Deceptive

110. TikTok offers another deficient and ineffective parental control, called “Family Pairing.”

111. Family Pairing was designed to limit daily screen time, enable Restricted Mode, prevent their teen from searching for hashtags or videos, set the child’s account to “Private,” suggest accounts, limit direct messages to their child, limit who can comment on their child’s video, and limit who can see their child’s “liked” videos.⁴⁹

112. The only content-based restriction available in Family Pairing for years was Restricted Mode, which, as noted above, does not work. Further, parents cannot restrict their teens’ ability to view Livestreams.

48 *Restricted Mode*, TIKTOK SUPPORT, <https://perma.cc/V7LL-5XXF>.

49 *Family Pairing*, TIKTOK SUPPORT, <https://perma.cc/FJ5J-G86Q>.

113. Family Pairing is only available for set up on the TikTok mobile app, not on a mobile or desktop browser. In order for the feature to work, parents must download the TikTok mobile app for themselves, create accounts, and then set up Family Pairing.

114. Family Pairing is difficult to use, rarely used, full of holes, and easy to circumvent. For example, teens can easily evade Family Pairing by logging out of their accounts, switching accounts, or just disabling the feature themselves.

115. The ease of deactivating the Family Pairing feature makes it ineffective for parents to meaningfully limit content and usage for their child.

116. TikTok touts Restricted Mode and Family Pairing as safety features and fails to warn parents that neither meaningfully restricts the visibility of mature content on TikTok, or leads to meaningful increases in safety, or reduces the harm from TikTok’s addictive features.

117. TikTok has consistently told consumers that safety is its priority and that it “work[s] to design tools and policies that promote a safe and age-appropriate experience for teens 13-17.”⁵⁰ For example, TikTok says, “[o]ur most important commitment at TikTok is to create a welcoming environment that keeps our community safe,”⁵¹ and advertises its “tools” on its “Safety Center.”⁵² These tools do not increase anyone’s safety. They do not meaningfully protect minors from mature content, nor do they meaningfully limit the app’s addictive effects. *See* Matsumoto, L. et al., *Broken, Buried, or Missing: Anatomies of Failure (and Success) of Social Media Child Safety Features*, CYBERSAFETY RSCH. CTR. 25–27 (2026), <https://perma.cc/RW8R-ZMN7>. Defendants

50 Tracy Elizabeth, *Our Work to Design an Age-Appropriate Experience on TikTok*, TIKTOK (May 12, 2021), <https://perma.cc/2RCV-LXRS>.

51 *Our Approach to Safety*, TIKTOK, <https://perma.cc/T452-EWMZ>.

52 *Safety & privacy controls on TikTok*, TIKTOK, <https://perma.cc/KSC9-7VP7>.

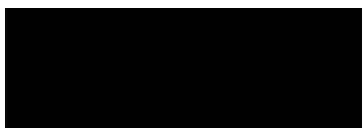
have considered and rejected more effective tools in the United States despite offering them in other jurisdictions.

F. TikTok’s Misrepresentations In Its Community Guidelines

118. TikTok’s Community Guidelines purport to inform users about what content TikTok permits. TikTok says the Community Guidelines “apply to everyone and everything on our platform.” *Community Guidelines*, Overview, TIKTOK (last updated Aug. 2025), <https://perma.cc/K3JP-7KDB>; *see also* TT-MT-AG-000254027 (February 2022 version of Community Guidelines).

119. TikTok’s Community Guidelines have informed users that “Our Community Guidelines establish a set of norms and common code of conduct that provide for a safe and welcoming space for everyone,” and “[w]e will remove any content—including video, audio, livestream, images, comments, links, or other text—that violates our Community Guidelines.” TT-MT-AG-000254027. The Community Guidelines also have contained the following misleading and deceptive statements, among many others:

- “We do not allow the depiction, promotion, or trade of drugs or other controlled substances.”
- “Do not post, upload, stream, or share: . . . [c]ontent that depicts or promotes drugs, drug consumption, or encourages others to make, use, or trade drugs or other controlled substances,” or “[c]ontent that depicts or promotes the misuse of legal substances, or instruction[s] on how to make homemade substances, in an effort to become intoxicated.”
- “We do not allow the depiction, including digitally created or manipulated content, of nudity or sexual activity.”
- “Do not post, upload, stream, or share: . . . [c]ontent that depicts a sexual fetish,” or “[c]ontent that depicts genitals, buttocks, the pubic region, or female nipples,” or “[c]ontent that contains sexually explicit language for sexual gratification.”



120. In 2023, TikTok updated its Community Guidelines, but they remain misleading and deceptive to Pennsylvania consumers. In the updated Community Guidelines, TikTok says its “content moderation is built on four pillars,” which include “Remove violative content from the platform that breaks our rules” and “[a]ge-restrict mature content so it is only viewed by adults (18 years and older).” *Community Guidelines*, TIKTOK (last updated Mar. 2023), <https://perma.cc/X8AU-6ZJ2>. Specifically:

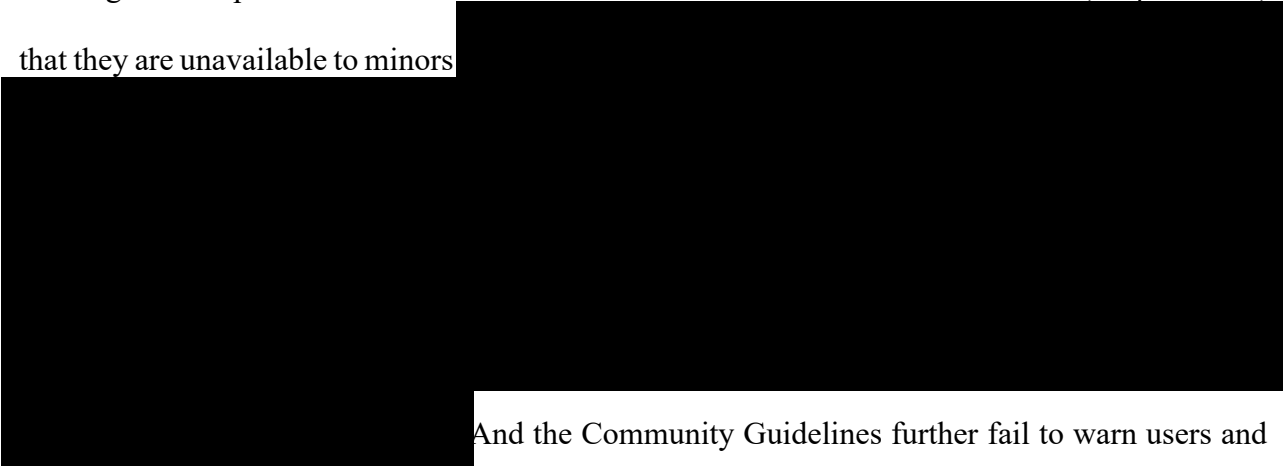
- “We do not allow showing or promoting recreational drug use, or the trade of alcohol, tobacco products, and drugs,” and “[w]e do not allow showing or promoting young people possessing or consuming alcohol, tobacco products, and drugs.”⁵³
- “We do not allow sexual activity or services,” including “sex, sexual arousal, fetish and kink behavior, and seeking or offering sexual services.” Also “[n]ot allowed” are “sexual chats, imagery, and pornography” and “[s]exual services, including offering or asking for sexual services (solicitation), sexual chats, imagery, pornography, member exclusive content, and streaming of adult content through a webcam.” (“Sexual Activity and Services”). The only content noted as specifically “[a]llowed” “Sexual Activity and Services” is “[r]eproductive health and sex education content, such as the use of birth control and abortion discussed in an [sic] medical way.”⁵⁴
- “Seductive performances,” “[s]exualized posing,” and “[a]llusions to sexual activity” by adults are allowed, but TikTok claims to restrict such content to those 18 years and older. And TikTok claims that “[c]ontent is age-restricted if it shows significant body exposure of an adult,” where “significant body exposure” includes “uncovered genitals and buttocks, as well as nipples and areolas of women and girls.”⁵⁵

53 *Community Guidelines*, TIKTOK (last updated Mar. 2023), <https://perma.cc/X8AU-6ZJ2>.

54 *Id.*

55 *Id.*

121. As already alleged, drug-related, sexual, and other mature content and profanity is abundant on TikTok and is not restricted to users aged 18 and older. The Community Guidelines are misrepresentations, deceptions, and false promises because they mislead many users by creating a net impression that these kinds of content are unavailable on TikTok and, in particular, that they are unavailable to minors



And the Community Guidelines further fail to warn users and parents about the intensity or frequency of mature and vulgar content on TikTok.

122. The Community Guidelines did not mention profanity at all until March 2023, when TikTok added that “sexually explicit narratives in some artistic contents, such as song lyrics” is allowed on TikTok. TTI-AG-LIT-800131975, at -2000. Even this addition is inadequate because, in fact, TikTok exempts song lyrics entirely from the Community Guidelines’ coverage.

II. TikTok Is Intentionally Addictive And Deceives Pennsylvanians About That Fact.

123. To drive growth and revenue in the United States, TikTok strategically designs and deploys exploitative and manipulative features to addict young users and maximize their time on its platform.⁵⁶

⁵⁶ Neil Richards & Woodrow Hartzog, *Against Engagement*, 104 BOS. UNIV. L. REV. 1151 (2024); Arvind Narayanan, *Understanding Social Media Recommendation Algorithms*, KNIGHT FIRST AMENDMENT INSTITUTE, at 22–28 (2023), <https://perma.cc/697S-FMZB>.

124. The more time users spend on the platform, the more ads they watch, which increases TikTok’s ad revenue.⁵⁷

125. TikTok’s targeted focus on increasing young users’ time on its platform is no accident: internal TikTok documents note that young users are “more easily persuaded” than adults; that they “likely don’t understand risks of unhealthy usage as well as older users”;⁵⁸ and that they “are particularly sensitive to reinforcement in the form of social reward and have minimal ability to self-regulate effectively.”⁵⁹

126. TikTok knowingly created platform features intended to cause excessive, compulsive, and addictive use, despite knowing that young people are more susceptible to—and acutely harmed by—those features.⁶⁰

127. 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.⁶¹

57 TT-MT-AG-000198786, at -797 (“[t]he advertising-based business model encourages optimization for time spent in the app, through our recommender algorithm and design of new features.”).

58 TT-MT-AG-000635619, at -626.

59 *Id.* at -625.

60 *Potential Risks of Content Features, and Functions*, AM. PSYCH. ASS’N (Apr. 2024).

61 See *Global: TikTok’s ‘For You’ Feed Risks Pushing Children and Young People Towards Harmful Mental Health Content*, AMNESTY INT’L (Nov. 7, 2023), <https://bit.ly/4eTI1oH>; see also Edward Herbert, *How TikTok Affects Children’s Mental Health*, THE CHILDREN’S SOC’Y (Apr. 5, 2023), <https://bit.ly/3Yehltl>; Vanessa Yurkevich, *Why Experts Worry TikTok Could Add to Mental Health Crisis Among US Teens*, CNN BUS. (Jan. 11, 2023), <https://bit.ly/3YfVj9u>; *Disrupted Childhood: The cost of persuasive design*, 5 RIGHTS FOUND. (Apr. 2023), <https://perma.cc/WY73-AQDP>.

128. TikTok outfitted the platform with features that its own employees describe as “coercive design tactics”⁶² particularly effective at enticing younger users, who TikTok employees admit, “have minimal ability to self-regulate effectively.”⁶³

129. TikTok’s design choices exploit the neurotransmitter dopamine, which helps humans feel pleasure as part of the brain’s reward system to encourage reinforcement.⁶⁴

130. Dopamine “rewards” can lead to addictive behavior, particularly when rewards are unpredictable.

131. Unpredictably delivered dopamine hits, known as “variable rewards,” are particularly effective at influencing human behavior.

132. TikTok harnesses this well-researched method to fuel excessive, compulsive, and addictive use of its platform, also knowing that the prospect of an *unpredictable* dopamine “reward” is even more addicting than consistent dopamine “rewards.”⁶⁵

133. TikTok’s “recommendation system” and “For You feed” are the heart of its addictive platform features. TikTok’s recommendation system is a complex series of algorithms that powers the “For You feed,” which provides users with a stream of videos that TikTok’s recommendation system predicts will keep them on the platform. TikTok’s “recommendation

62 TT-MT-AG-000245170, at -180.

63 TT-MT-AG-000635619, at -625.

64 *Id.*

65 See Stephanie Watson, *Dopamine: The Pathway to Pleasure*, HARV. MED. SCH. (July 20, 2021), <https://bit.ly/3ZPQmFO>; Rasan Burhan & Jalal Moradzadeh, *Neurotransmitter Dopamine (DA) and its Role in the Development of Social Media Addiction*, 11 J. NEUROLOGY & NEUROPHYSIOLOGY 1 (2020), <https://perma.cc/KS3X-HH4J>.

system” is content-agnostic or, in TikTok’s own words, “content-neutral,” *i.e.*, it “recommends videos to users based on content-neutral user and community behavior.”⁶⁶

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

- a. First, TikTok monitors and records how a user engages with the platform in a “user log,” including pressing the “Like” button on a video, skipping a video, commenting on a video, sharing a video, and more.⁶⁷
- b. Second, it organizes this information to identify patterns in the way a user reacts to the videos selected by TikTok by analyzing the user’s previous actions (clicks, view time, etc.).⁶⁸
- c. Third, it uses the recommendation system to compare the user’s pattern of engagement with videos to that of other users, and then pushes the user videos that have induced maximum engagement by other users with similar patterns of engagement.⁶⁹
- d. TikTok internally describes its recommendation system as “addictive.”⁷⁰

135. In addition to the For You feed, TikTok uses multiple other features to manipulate users into compulsive and excessive use.

⁶⁶ As described in an internal TikTok document, the recommendation system’s “algorithm doesn’t care about the content—it doesn’t have an agenda. It doesn’t qualitatively understand” what content it shows users. TTI-AG-LIT-009644333. Another internal document similarly espouses TikTok’s recommendation system’s “content-neutral” nature because “it recommends content based on behavioral and certain device signals, not on the semantic nature of the content itself,” “[d]oes **not** promote or suppress particular . . . agendas, views, or content,” and “[d]oes **not** ‘understand’ content.” TTI-AG-LIT-009304480 at slide 33 (emphasis in original).

⁶⁷ TT-MS-AG-000201151, at -158; *see* TT-MS-AG-000027872 (“[A]ll user actions are analyzed as input for feature generation through the user’s log. Features are generated based upon previous actions (clicks, view time, etc.)”).

⁶⁸ *See generally* TT-MS-AG-000027872.

⁶⁹ *See generally* TT-MS-AG-000201151.

⁷⁰ TTI-AG-LIT-800021417, at -423, -428.

136. TikTok’s platform contains filters, or “Effects,” which allow users to alter their appearance in photos and videos. When combined with the platform’s other features, they incentivize young users to alter their appearance in images and videos in ways that mimic cosmetic surgery and/or foster unrealistic beauty standards, among other body dysmorphic impacts that are known to harm self-esteem and induce negative body image. Because TikTok knows these Effects features significantly increase usage of the platform,⁷¹ particularly among minor users, it retains these features despite the harm to young users.⁷²

137. Another feature is called “Autoplay,” which means that a video automatically begins to play in the users’ For You feed when the user launches the app. This feature is designed to immediately grab the user’s attention and immerse them into the platform. TikTok internally tested Autoplay and determined that it boosted user engagement and use of the platform.⁷³ TikTok deploys Autoplay to exploit young users’ novelty-seeking minds and their especially strong desire to see new activity. TikTok does not allow users to disable the Autoplay feature in the For You Feed.

138. Another feature of the TikTok platform is endless scrolling, also called “Infinite Scroll.” This refers to the way that the TikTok platform allows users to endlessly and seamlessly swipe up to watch more content anywhere in the app, effortlessly loading new videos that the recommendation system continuously and perpetually selects based on the individual user. Endless scrolling compels young users to spend more time on the platform by making it difficult to disengage.⁷⁴ This perpetual stream is designed to “keep [users] scrolling, and purposely eliminate

71 TT-MS-AG-000672609, at -609.

72 *Id.*

73 TT-MS-AG-000268398.

74 See LEARNFREE, *Why We Can’t Stop Scrolling* (YouTube, Nov. 20, 2019), <https://bit.ly/47Dv8OH>.

any reason for [them] to pause, reconsider or leave.”⁷⁵ 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 networking sites.”⁷⁶ TikTok knows that “continuous scroll [and] few or no breaks between content” contributes to users’ challenges in managing their time spent on the platform, and it intentionally maintains those features.⁷⁷

139. TikTok LIVE allows users to broadcast and watch live videos. TikTok LIVE is extremely popular. In 2022, of the 83 million daily U.S. TikTok users, 20% (nearly 17 million people) watched LIVE every day.⁷⁸ Over 110,000 U.S. TikTok users streamed themselves on LIVE every day, for, on average, one hour every day. LIVE viewers have been described by TikTok as a “committed” user base, with 62% of them watching LIVE every day.⁷⁹ By default, TikTok LIVE content is available only once, while the creator livestreams. This ephemeral nature of TikTok LIVE videos encourages users to visit and remain on the platform longer. Other features of TikTok LIVE, including virtual cash contributions and the ability to earn rewards, serve to gamify the feature and further addict young users.

⁷⁵ See Von Tristan Harris, *The Slot Machine in Your Pocket*, SPIEGEL INT’L (July 27, 2016), <https://bit.ly/47ZdwM7>.

⁷⁶ 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 (2022); Christopher L. Heffner, *Doomscrolling: The Ultimate Negative Flow State and Four Ways to Counter It*, ALLPSYCH (Nov. 26, 2022), <https://bit.ly/3YdsMBu>; Hannah Jantos, *The Psychology of TikTok: Why You Can’t Stop Scrolling*, SOC. FIXATION (Sep. 20, 2022), <https://bit.ly/3zLopo3>.

⁷⁷ TT-MT-AG-000214536, at -537; see also TT-MS-AG-000204555, at -556.

⁷⁸ TTI-AG-LIT-011995320, at -324–25.

⁷⁹ *Growing Your Community with TikTok LIVE*, TIKTOK (July 19, 2022), <https://perma.cc/MY2W-JTDS>.

140. TikTok Stories is another ephemeral feature that drives young users to visit and remain on the app. TikTok Stories are short videos that vanish after 24 hours. By design, this rapidly disappearing content pressures users to check the TikTok platform more frequently.

141. Push notifications are TikTok-created signals that display on a user's device to alert the user of activity on the platform to prompt a return to or continued use of the app. Push notifications are integral to TikTok's business goal of prolonging youth time spent on the platform. TikTok crafts and sends these messages without third-party (creator) involvement. Their design relies on well-understood neurological and psychological phenomena, including using sounds and vibrations to trigger sudden dopamine releases and preying on youth's social sensitivity and fear of missing out on seeing new activity.⁸⁰ TikTok employees observe that the overarching goal of push notifications is "to encourage users to open the App more and stay longer."⁸¹ TikTok operationalized this goal by creating a variety of push notifications, to "[f]ind the best push time and the best push count for every user to maximize [daily active users] and retention."⁸²

142. TikTok also relies on the concept of variable reward schedules—the same psychological mechanism that underlies the addictive nature of slot machines—in deploying its push notifications. Variable reward schedules 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.⁸³ TikTok knows

80 See Trevor Haynes, *Dopamine, Smartphones & You: A Battle for Your Time*, HARV. U. GRADUATE SCH. OF ARTS & SCIS. BLOG (May 1, 2018), <https://bit.ly/3BGcSHf>.

81 TT-MT-AG-000211287, at -288.

82 TT-MS-AG-000253144, at p.7.

83 Rasan Burhan & Jalal Moradzadeh, *Neurotransmitter Dopamine (DA) and its Role in the Development of Social Media Addiction*, 11 J. NEUROLOGY & NEUROPHYSIOLOGY 1 (2020), <https://perma.cc/KS3X-HH4J>.

that its variable reward schedule for delivering notifications succeeds to increase the frequency with which users return to and open the app.⁸⁴

143. The TikTok app also uses “Likes,” comments, and other interactions to “serve as a reward for social media users,” and keep them returning to the app and staying for longer.⁸⁵ These features prompt dopamine rewards in the user’s brain and also capitalize on young users’ social awareness and concern for their reputation and image. TikTok further accentuates these effects by publicly quantifying and displaying the number of “Likes,” comments, and other interactions, which drives more use of its platform, despite knowing the harmful effects on its teenage users.⁸⁶

144. TikTok knows that these features of its app create addiction among users, especially young users. Internal TikTok documents confirm that:

Addiction to technology is a ubiquitous problem that TikTok and most other platforms deal with today. Addiction takes many forms such as overall time spent on an app, de-prioritizing other important areas of life, and generating self-worth based on number of likes; all of which and countless others have made us realize the consequences of optimizing for engagement and retention metrics.⁸⁷

145. Furthermore, excessive, compulsive, and addictive use of TikTok keeps minors on the app late at night, decreasing the amount and quality of their sleep. 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.⁸⁸ TikTok knows of

84 TT-MS-AG-000815501, sheet “1-2’20 (Launched)”, cells B3–F3.

85 See 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://bit.ly/4gUvYZS>.

86 TT-MS-AG-000259027, at pp. 2–3.

87 TT-MT-AG-000635766, at -767.

88 See, e.g., *Health Advisory on Social Media Use in Adolescence*, AM. PSYCH. ASS’N, (May 2023), <https://perma.cc/TUF5-JLM4>; Seung-Schik Yoo et al., *A Deficit in the Ability to Form New Human Memories Without Sleep*, NATURE NEUROSCIENCE 385 (2007); see also Megan

these harms. The company knows that as recently as 2022, 19% of users aged 13 to 15 and 25% of those aged 16-18 used the platform between midnight and 5:00am.⁸⁹

146. TikTok has considered features that would reduce compulsive use but has chosen not to implement them, preferring instead to maximize user time on the platform despite the addictive consequences for users, especially young users.

147. TikTok misleads consumers about the purpose and effect of the compulsive design elements it incorporates into its platform and fails to disclose the risk of addiction. Leaders at TikTok downplay and deny the impact of the platform's compulsive design elements by emphasizing that the platform provides a positive experience for users and incorporates time-management tools. In April 2023 at a Ted Talk conversation, Shou Chew reiterated that TikTok's "goal is not to optimize and maximize time spent. It is not."⁹⁰ He also stated, "[i]f you spend too much time on our platform, we will proactively send you videos to tell you to get off the platform. We will. And depending on the time of day, if it's late at night, [the video] will come sooner."⁹¹

148. This response omits TikTok's relentless targeting of users' time and attention, and measuring success based on metrics, such as how many young people use the platform per day and

A. Moreno & Anna F. Jolliff, *Depression and Anxiety in the Context of Digital Media*, HANDBOOK OF ADOLESCENT DIGIT. MEDIA USE AND MENTAL HEALTH, CAMBRIDGE UNIV. PRESS 217 (2022); Hugues Sampasa-Kanyinga et al., *Use of Social Media Is Associated with Short Sleep Duration in a Dose-Response Manner in Students Aged 11 to 20 years*, 107 ACTA PAEDIATRICA 694 (2018); Eti Ben Simon & Matthew P. Walker, *Sleep Loss Causes Social Withdrawal and Loneliness*, 9 NATURE COMM'NS 1, 4 (2018), <https://bit.ly/3NgvtvX>; Els van der Helm et al., *Sleep Deprivation Impairs the Accurate Recognition of Human Emotions*, 33 SLEEP 335 (2010), <https://bit.ly/4eUdy9Y>.

⁸⁹ TT-MS-AG-000229218, at p.4.

⁹⁰ See *TikTok's CEO on its future — and what makes its algorithm different*, TED at 20:41 (Apr. 2023), <https://perma.cc/C5QV-RHC9>.

⁹¹ *Id.* at 21:00.

month; how long they spend watching videos; how many videos they watch; and whether they keep coming back—a practice TikTok has engaged in for years.⁹²

149. TikTok executives have touted the platform’s in-app time management tools to counter perceptions that the platform is designed to increase engagement.

150. At a congressional hearing about prolonged engagement in October 2021, Mr. Beckerman 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.”⁹³

151. TikTok has also publicly touted its screentime management tools and other purported “safety features” like “Refresh” (to purportedly reset the algorithm), “Restricted Mode” (to protect users from harmful content), and Family Pairing (to provide parental controls) despite knowing that these features have only a negligible effect on platform use. TikTok knows that these tools are not effective and are not designed to be effective.

152. For example, in his written testimony to Congress in March 2023, Shou Chew misrepresented TikTok’s approach to safety by stating: “TikTok also has taken numerous steps to help ensure that teens under 18 have a safe and enjoyable experience on the app. . . . We launch great products with a safety-by-design mentality, even if those features limit our monetization opportunities.”⁹⁴

92 See, e.g., TT-MS-AG-000080523, at -547; TT-MS-AG-000028387, at -389.

93 See *Protecting Kids Online: SnapChat TikTok, and YouTube: H’rg before the Subcomm. on Consumer Protection, Product Safety, & Data Security* at 59, 117th Cong. (2021), <https://perma.cc/4BZR-7WEZ>.

94 See Written Testimony of Shou Chew, Chief Executive Officer, TikTok Inc., Before the U.S. House Comm. on Energy & Com., 118th Cong., 1st Sess. (Mar. 23, 2023), <https://perma.cc/6DPS-Y5QS> (“Chew Written Testimony”).

III. TikTok’s Misrepresentations are Relevant and Capable of Misleading Consumers.

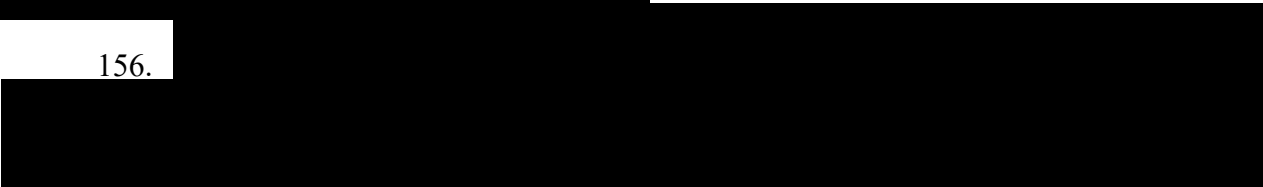
153. Defendants’ misrepresentations—the age ratings and associated statements, the Community Guidelines, and Defendants’ statements about addictiveness, Restricted Mode, and Family Pairing—are misleading to parents and other consumers making decisions about how, and even whether, to use the TikTok app. Just as parents might determine which movies are appropriate for their children based on the “rating” a movie receives (G, PG, PG-13, or R), parents might also check the age rating of apps before allowing their children to download and use them. Parents may supervise their children’s devices to see which apps their children are downloading or use parental controls to prevent their children from downloading apps with particular age ratings. Parents also read information about apps before allowing their children to download them, and they research apps’ parental-control features.

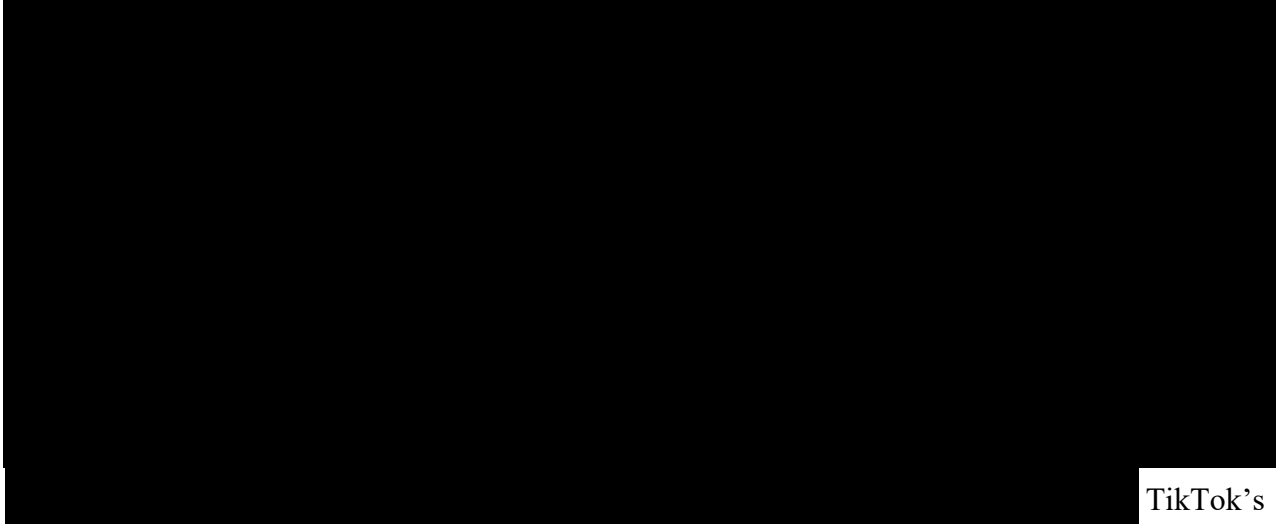
154. TikTok’s representations and acts are particularly material to Pennsylvania parents and other TikTok users because once a TikTok user sees harmful content on the app, it is impossible to “unsee” the harmful material.

155.



156.





TikTok's

misrepresentations seek to prevent parents who are unfamiliar with the content on the TikTok app from developing such concerns.

CAUSES OF ACTION

COUNT I

TikTok's Misrepresentations About Platform Age-Appropriateness in Age Ratings and Elsewhere Are Deceptive

Violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Law

157. All the foregoing paragraphs are incorporated by reference.

158. Section 201-2(3) of the UTPCPL defines “trade” and “commerce” to mean the “advertising, offering for sale, sale or distribution of any services and any property, tangible or intangible, real, personal or mixed, and any other article, commodity, or thing of value wherever situate, and includes any trade or commerce directly or indirectly affecting the people of this Commonwealth.”

159. TikTok engaged and continues to engage in trade and commerce in the Commonwealth of Pennsylvania by, among other acts, marketing and offering in exchange for valuable consideration its social media platform to Pennsylvania consumers, hosting and profiting

from advertisements on its platform, and permitting Pennsylvania consumers to make direct purchases on TikTok.

160. Unfair or deceptive acts or practices in the conduct of any trade or commerce as defined by subclauses (i) through (xxi) of Section 201-2(4) of the UTPCPL are declared unlawful, and whenever the Attorney General has reason to believe that any person is using or is about to use any method, act, or practice declared unlawful, Section 201-4 of the UTPCPL authorizes the Attorney General to bring an action against such person to restrain these methods, acts, or practices.

161. TikTok's unfair or deceptive acts include but are not limited to TikTok's misrepresentations about the nature and severity of the content on its app.

162. In connection with the advertising, marketing, and promotion of TikTok, TikTok made and continues to make deceptive representations to the public that have the capacity or tendency to mislead consumers acting reasonably under the circumstances. These include, but are not limited to, TikTok's 12+ or 13+ and "T for Teen" age ratings, as well as TikTok's claims that profanity, sexual content, drug content, and other mature content on the TikTok platform is "Infrequent/Mild." TikTok knew or should have known that its deceptive statements were false or misleading.

163. TikTok engages in representations, acts, practices, or omissions that have the capacity or tendency to deceive Pennsylvania consumers.

164. TikTok's acts and practices described herein constitute unfair or deceptive acts or practices, as prohibited by Section 201-3 of the UTPCPL as defined by Section 201-2(4)(v) ("Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits or quantities that they do not have"); (vii) ("Representing that goods are or services

are of a particular standard, quality or grade, or that goods are of a particular style or model, if they are of another”); and (xxi) (“Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or misunderstanding”).

165. TikTok knew or should have known that its conduct was unfair and deceptive as to the content of its app, which is readily accessible publicly and internally known to TikTok.

166. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of TikTok’s violations of the UTPCPL. Absent injunctive relief by this Court, TikTok is likely to continue to injure consumers and harm the public interest.

PRAYER FOR RELIEF

WHEREFORE, the Commonwealth requests that the Court:

- A. Enter judgment in favor of the Commonwealth and against TikTok;
- B. Declare that TikTok’s actions violate the UTPCPL;
- C. Temporarily and permanently enjoin TikTok to prevent future violations of the UTPCPL;
- D. Award civil penalties for TikTok’s willful violations;
- E. Award the Commonwealth its costs and fees, including expert-witness expenses; costs incurred in pursuing this action and investigation, including prejudgment and post-judgment interest at the highest lawful rates;
- F. Declare that each Defendant is jointly and severally liable for all penalties and money damages awarded; and
- G. Grant such other and further legal or equitable relief as justice requires.

COUNT TWO

TikTok's Addictive Design Features Are Deceptive

Violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Law

167. All the foregoing paragraphs are incorporated by reference.

168. TikTok's deceptive acts include but are not limited to TikTok's choice to design TikTok to include features known to promote compulsive, prolonged, and unhealthy—addictive—use by children and teens.

169. In connection with the advertising, marketing, and promotion of TikTok, TikTok made and continues to make deceptive statements and omissions to the public that have the capacity or tendency to mislead consumers. These include, but are not limited to, TikTok's claims that its app is safe for those 12+ or 13+ and related statements plus its failure to disclose the fact that TikTok is designed to promote behavioral addiction, that it hosts large amounts of sexualized, drug-related, and other mature content, and that it can be easily used to purchase drugs and engage in other dangerous activities.

170. The addictive nature of TikTok's app, which TikTok explicitly seeks through its deliberate design choices, deceives Pennsylvania consumers.

171. TikTok knew or should have known that its conduct was deceptive as to the app's addictiveness, which has been heavily researched and publicized and is internally known to TikTok.

172. TikTok's acts and practices described herein constitute deceptive acts or practices, as prohibited by Section 201-3 of the UTPCPL as defined by Section 201-2(4)(v) ("Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits or quantities that they do not have"); (vii) ("Representing that goods are or services are of a particular

standard, quality or grade, or that goods are of a particular style or model, if they are of another”); and (xxi) (“Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or misunderstanding”).

173. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of TikTok’s violations of the UTPCPL. Absent injunctive relief by this Court, TikTok is likely to continue to injure consumers and harm the public interest.

PRAYER FOR RELIEF

WHEREFORE, the Commonwealth requests that the Court:

- A. Enter judgment in favor of the Commonwealth and against TikTok;
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- E. Award the Commonwealth its costs and fees, including expert-witness expenses; costs incurred in pursuing this action and investigation, including prejudgment and post-judgment interest at the highest lawful rates;
- F. Declare that each Defendant is jointly and severally liable for all penalties and money damages awarded; and
- G. Grant such other and further legal or equitable relief as justice requires.

COUNT THREE

TikTok's Addictive Design Features Are Unfair

Violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Law

174. All the foregoing paragraphs are incorporated by reference.

175. TikTok's unfair acts include but are not limited to TikTok's choice to design TikTok to include features known to promote compulsive, prolonged, and unhealthy use by children and teens.

176. TikTok has deliberately designed its app to be addictive, especially to minors, and as a result, its product is unfair to consumers. Minors cannot use the TikTok app and avoid its addictive features, which are embedded in how the app functions. TikTok relies on these features to keep minor users on the app for long periods of time in order to profit from larger advertising revenue at the expense of minor users' mental health. TikTok's addictive app features are known to promote, exacerbate, and cause mental health harms in minors, including but not limited to depression and suicide, anxiety, eating disorders, social media addiction, risky sexual behaviors, use of drugs and alcohol, and sleep deficiency.

177. TikTok knew or should have known that its conduct was unfair as to the app's addictiveness, which has been heavily researched and publicized and is internally known to TikTok.

178. Defendant's aforementioned acts and practices constitute unfair trade practices that violate Section 201-3, as defined by Section 201-2(4) of 73 P.S. Specifically, the aforementioned acts and practices: (1) offend public policy; (2) are immoral, unethical, oppressive, or scrupulous; and/or (3) cause substantial injury to advertising customers.

179. TikTok’s acts and practices described herein constitute unfair acts or practices, as prohibited by Section 201-3 of the UTPCPL as defined by Section 201-2(4)(v) (“Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits or quantities that they do not have”); (vii) (“Representing that goods are or services are of a particular standard, quality or grade, or that goods are of a particular style or model, if they are of another”); and (xxi) (“Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or misunderstanding”)

180. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of TikTok’s violations of the UTPCPL. Absent injunctive relief by this Court, TikTok is likely to continue to injure consumers and harm the public interest.

PRAYER FOR RELIEF

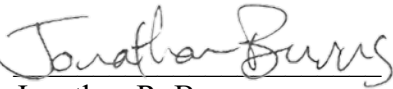
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- H. Enter judgment in favor of the Commonwealth and against TikTok;
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- K. Award civil penalties for TikTok’s willful violations;
- L. Award the Commonwealth its costs and fees, including expert-witness expenses; costs incurred in pursuing this action and investigation, including prejudgment and post-judgment interest at the highest lawful rates;
- M. Declare that each Defendant is jointly and severally liable for all penalties and money damages awarded; and
- N. Grant such other and further legal or equitable relief as justice requires.

Date: August 11, 2026

Respectfully submitted,

DAVID W. SUNDAY, JR.
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*Applications For Admission *Pro Hac Vice* Forthcoming

Attorneys for the Commonwealth of Pennsylvania

**IN THE COURT OF COMMON PLEAS FOR
ALLEGHENY COUNTY, PENNSYLVANIA**

COMMONWEALTH OF PENNSYLVANIA,	:	CIVIL ACTION
OFFICE OF ATTORNEY GENERAL,	:	
By Attorney General David W. Sunday, Jr.,	:	EQUITY
	:	
Plaintiff,	:	
	:	
v.	:	GD No.
	:	
TIKTOK INC., TIKTOK LTD., TIKTOK PTE.	:	
LTD., TIKTOK USDS JOINT VENTURE LLC,	:	
BYTEDANCE LTD., AND BYTEDANCE INC.,	:	
	:	
Defendants.	:	
	:	

VERIFICATION

I, Mia Paone, hereby state that I am a Senior Civil Investigator for the Commonwealth of Pennsylvania, Office of Attorney General, Bureau of Consumer Protection, and I am authorized to make this verification on behalf of the Plaintiff in the within action. I hereby verify that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge or information and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsifications to authorities.

Date: 8/11/2026

By: Mia Paone
Mia Paone
Senior Civil Investigator

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COMMONWEALTH OF PENNSYLVANIA,	:	CIVIL ACTION
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LTD., TIKTOK USDS JOINT VENTURE LLC,	:	
BYTEDANCE LTD., AND BYTEDANCE INC.,	:	
	:	
Defendants.	:	
	:	

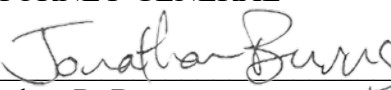
CERTIFICATE OF COMPLIANCE

I, Jonathan Burns certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents, differently than non-confidential information and documents.

COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ATTORNEY GENERAL

DAVID W. SUNDAY, JR.
ATTORNEY GENERAL

Date: August 11, 2026

By 
Jonathan R. Burns
Senior Deputy Attorney General
Attorney-in-Charge, Technology and Privacy
Protection Unit
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