IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE
FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

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IN RE INVESTIGATION OF TIKTOK, INC.	Case No. 23-0298-IV

MOTION FOR LEAVE FOR BRIEF OF *AMICI CURIAE* THE COLORADO DEPARTMENT OF LAW AND 45 OTHER STATES IN COMMON INTEREST

The Colorado Department of Law and 45 other states in common interest (collectively, the "States"), by and through the undersigned counsel, pursuant to this Court's discretionary authority and Tennessee Rule of Appellate Procedure 31, respectfully move this Court for leave to file a brief in this action as *Amici Curiae*. As grounds for this Motion, the States show this Court as follows:

1. The States seek to file the attached *amicus curiae* brief in support of the Tennessee Attorney General's Motion for an Order Compelling Compliance with the Attorney General's Request for Information.
2. The Court has discretion to permit the States' attorneys generals to appear as *amici* and provide supplemental briefing to assist the Court in resolving Tennessee's motion. *See, e.g.*, *State ex rel. Com'r of Transp. v. Med. Bird Black Bear White Eagle*, 63 S.W.3d 734, 758-59 (Tenn. Ct. App. 2001).
3. When the States' attorney generals believe that a company is violating their consumer protection laws, they will often form a multistate investigation. These multistate investigations enable the States to leverage resources and work together to pursue their

common interest in protecting consumers. By sharing information, time, and money, these multistate investigations allow the States to most effectively protect consumers and to pursue important claims against well-resourced companies that might otherwise escape enforcement.

4. This case squarely implicates the States' significant interest in protecting vulnerable citizens of their states and the public, particularly children and teens, from harms caused by TikTok, as well as the States' need to obtain critical information in response to requests made in the context of multistate investigations.[1] The States[2] have good reason to believe that TikTok's unfair and deceptive conduct has fueled an ongoing crisis in the mental health of children and teens, and they have invested substantial resources into a multistate investigation to determine the scope of that conduct. However, TikTok has failed to respond adequately and appropriately to the States' reasonable requests for information made pursuant to the multistate investigation, withholding and obscuring information that is crucial to the States' understanding of the conduct at issue, and impeding the States' ability to protect their citizens.

5. The States submit this brief to assist the Court in resolving the controversy between the parties by providing information about the scope of widespread public interest at issue in

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[1] To reduce administrative burden and facilitate productive discussions with TikTok, the States strategically decided that only eight states (including Tennessee) would issue requests for information from TikTok. The remaining States have also invested substantial resources into this investigation, share a significant interest in the information requested, and strongly believe that the information is critical to the ongoing multistate investigation.

[2] Several States' laws prohibit disclosure of whether they are participating in a prefiling investigation of a particular company. However, all States participate in multistate investigations at one time or another and have an interest in ensuring companies respond to their requests for information that is vital to multistate investigations and consumer protection. For the sake of simplicity, States are referenced as a single group throughout this motion. This does not confirm any particular state's participation in the multistate investigation into TikTok.

this case, and by describing the relevance of Tennessee's requests to that public interest. As set forth fully in the brief: (1) there is currently a mental health crisis among children and teens in the United States, and the States have good reason to investigate TikTok as a substantial cause of the ongoing public crisis in youth mental health; and (2) the information sought by Tennessee is crucial to the States' understanding of TikTok's deceptive, unfair, and unconscionable conduct.

6. This Court's ruling has significant ramifications reaching beyond the present enforcement dispute at issue in Tennessee. The States' *Amici* Brief describes TikTok's role in the growing nationwide crisis in youth mental health as well as the implications of this Court's ruling for the multistate investigation.

Dated: March 6, 2023.

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NOTICE OF HEARING

THIS MOTION SHALL BE HEARD ON FRIDAY, THE 24TH DAY OF MARCH 2023, AT 9:00 A.M. IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE, AT NASHVILLE METROPOLITAN COURTHOUSE, 1 PUBLIC SQUARE, NASHVILLE, TENNESSEE 37201. FAILURE TO FILE AND SERVE A TIMELY WRITTEN RESPONSE TO THE MOTION WILL RESULT IN THE MOTION BEING GRANTED WITHOUT FURTHER HEARING.

CERTIFICATE OF SERVICE

I, Matthew D. Janssen, hereby certify that I caused a copy of the foregoing to be served upon the following by hand delivery or electronic mail:

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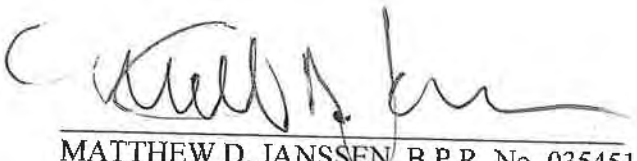

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IN RE INVESTIGATION OF TIKTOK, INC.	Case No.

BRIEF OF *AMICI CURIAE* THE COLORADO DEPARTMENT OF LAW AND 45 OTHER STATES IN COMMON INTEREST

The *Amici* States[1] of Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii[2], Idaho, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Texas, Utah, Vermont, Virginia, Wisconsin, and Wyoming submit this brief in support of the Motion to Compel filed by the State of Tennessee. The Court has discretion to permit the states' attorneys general to appear as *amici* and provide supplemental briefing to assist the Court in resolving Tennessee's action to enforce its requests for information. *See, e.g.*, *State ex*

[1] All *Amici* states participate in multistate investigations at one time or another and have an interest in ensuring companies respond to their requests for information. For the sake of simplicity, *Amici* states are referenced as a single group throughout this brief. This does not confirm any particular state's participation in the multistate investigation into TikTok.

[2] Hawaii is represented on this matter by its Office of Consumer Protection, an agency which is not part of the state Attorney General's Office, but which is statutorily authorized to undertake consumer protection functions, including legal representation of the State of Hawaii. For simplicity purposes, the entire group will be referred to as the "Attorneys General" or individually as "Attorney General" and the designations, as they pertain to Hawaii, refer to the Executive Director of the State of Hawaii's Office of Consumer Protection.

rel. Com'r of Transp. v. Med. Bird Black Bear White Eagle, 63 S.W.3d 734, 758-59 (Tenn. Ct. App. 2001).

I. INTEREST OF *AMICI CURIAE*

Tennessee's motion to compel arises from a nationwide investigation into TikTok's unfair and deceptive conduct and the harms TikTok's unlawful actions have caused to children and teens. When the attorneys general of several states believe that a company is violating their consumer protection laws, they will often form a multistate investigation. These multistate investigations enable the states to leverage resources and work together to pursue their common interest in protecting consumers in their states. By sharing information, time, and money, these multistate investigations allow the states to most effectively protect consumers and to pursue important claims against well-resourced companies that might otherwise escape enforcement.

A multistate group has invested substantial resources into the TikTok investigation. In addition to Tennessee, seven other states in the multistate investigation issued requests for information (sometimes called Civil Investigative Demands or Investigative Subpoenas) to TikTok.[3] Like Tennessee, these states are authorized to petition the judiciary to enforce the terms of their respective Civil Investigative Demands.[4] And penalties are warranted under several *Amici* States' laws if a subject conceals, destroys, or otherwise withholds subpoenaed information.[5] A

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[3] Each state issued its demand under its own state statute authorizing pre-filing information collection for the state's enforcement of its consumer protection laws. *See, e.g.*, CAL. GOV'T. CODE § 11181(e); FLA. STAT. § 501.206(1); KY. REV. STAT. § 367.250; MASS. GEN. LAWS Ch. 93A § 6; NEB. REV. STAT. § 59-1611(1); N.J. STAT. ANN. § 56:8-3; VT. STAT. ANN. tit. 9, § 2460(a)(1).

[4] *See, e.g.*, CAL. GOV'T. CODE § 11188; FLA. STAT. § 501.206(3); KY. REV. STAT. §367.290(1)(c); MASS. GEN. LAWS Ch. 93A § 7; NEB. REV. STAT. § § 59-1611(8); N.J. STAT. ANN. §56:8-6; VT. STAT. ANN. tit. 9, § 2460(c)(1).

[5] *See, e.g.*, VT. STAT. ANN. tit. 9, § 2460(b) (authorizing a penalty of up to $25,000 for anyone who conceals, withholds, destroys or alters documents of any person on notice that they are being investigated under Vermont's consumer protection statute); MASS. GEN. LAWS Ch. 93A § 7 (authorizing up to $5,000 in fines for the same).

decision from this Court on Tennessee's motion may implicate these seven states' enforcement of their own requests and the multistate investigation more broadly. It is essential that each of the states in the multistate group access the information requested in Tennessee's motion so that each state can understand the scope of the underlying conduct and effectively protect their most vulnerable citizens.

II. INTRODUCTION AND STATEMENT OF ISSUES

The multistate group has good reason to believe that TikTok is violating state consumer protection laws in ways that have fueled the ongoing crisis in the mental health of children and teens. Tennessee, like other states, authorizes its attorney general to obtain relevant information from individuals or entities he has reason to believe are violating the law. TENN. CODE ANN. § 47-18-106(a)(1). Under this pre-filing investigative authority, the multistate sought information from TikTok about its actions, its knowledge, and its public statements.

For the sake of ease and efficiency, TikTok has agreed that Tennessee may share the documents it produces to Tennessee with the other states participating in the multistate investigation. Thus, TikTok's response to Tennessee's requests for information impacts not only Tennessee, but all states and territories participating in the multistate investigation. Of course, other states, including some of the *Amici* States, continue to negotiate with TikTok regarding compliance with investigatory demands and push for additional details regarding TikTok's retention practices. Tennessee's request for court intervention is complementary to those efforts—the Company's failure to preserve potentially relevant evidence and failure to produce information in a reasonably useable format is hampering the investigation of both Tennessee and states across the country.

The Court should compel TikTok's compliance with the reasonable requests for information by the State of Tennessee.

III. STATEMENT OF FACTS

As Tennessee's motion describes, TikTok has repeatedly failed to respond adequately and appropriately to its reasonable requests for information. All relevant facts regarding the efforts by the multistate to obtain this information can be found in Tennessee's motion.

IV. ARGUMENT

A. The multistate group has good reason to investigate TikTok as a substantial cause of the ongoing crisis in youth mental health.

Children and teens throughout this nation are experiencing a mental health crisis. This ongoing catastrophe has ended lives, devastated families, and damaged the potential of a generation of young people.

The scope and severity of this crisis has only become more alarming as time goes on. Just last month, the Centers for Disease Control and Prevention (CDC) reported a startling increase in challenges to youth mental health, youth experiences of violence, and suicidal thoughts and behaviors among teenagers. Girls are disproportionately affected. Nearly 3 in 5 (57%) high-school girls surveyed said they had experienced "persistent feelings of sadness or hopelessness" in the previous year, double the rate reported by boys.[6] Nearly a *third* of girls surveyed seriously considered suicide in 2021, up nearly 60% from 2011. In 2021, more than 1 in 10 girls reported a suicide attempt, marking a 30% increase from a decade ago.[7] All States involved in the multistate investigation face the same daunting problem: to determine what is causing this unfolding tragedy and to use their sovereign powers to protect their youth.

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[6] *See* CENTERS FOR DISEASE CONTROL AND PREVENTION, YOUTH RISK BEHAVIOR SURVEY: DATA SUMMARY & TRENDS REPORT (2023), *available at* https://www.cdc.gov/healthyyouth/data/yrbs/pdf/YRBS_Data-Summary-Trends_Report2023_508.pdf.
[7] *Id.*

Based on their investigation to date, the multistate investigation has overwhelming reason to believe that a significant driver of this crisis is the use of social media platforms, particularly TikTok. The deteriorating mental health of children and teens in the United States coincided with the mass introduction of social media platforms. Heavy use of social media is strongly associated with self-harm, depression, and low self-esteem in teens—and every additional hour young people spend on social media is associated with an increased severity of the symptoms of depression.[8]

The harm to young users is not limited to their exposure to damaging content. Habitual use of these platforms appears to affect how young users' brains mature and may degrade—possibly for life—young users' ability to regulate their behavior.[9] And the risk of such habitual use is heightened because of the addictive features of many social media platforms. As the designers of these platforms are well aware, their key features—such as infinite scrolling and unpredictable rewards—drive addictive behavior, especially among young users.[10]

The multistate group has good reason to be particularly concerned with the design, advertising, and curation of the TikTok platform. Since its launch in 2017 in the US, TikTok has taken steps to greatly increase the amount of time teens use the platform through addictive features like infinite scrolling, algorithmic manipulation, and other platform design features.[11] These

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[8] *See, e.g.*, Jacqueline Howard, *Increasing social media use tied to rise in teens' depressive symptoms, study says*, CNN (July 15, 2019), https://www.cnn.com/2019/07/15/health/social-media-depression-teens-study/index.html; *see also* Mark Travers, *A Generation of Adolescents might Suffer Because of Unregulated Social Media, Suggests New Research*, FORBES (June 9, 2022), https://www.forbes.com/sites/traversmark/2022/06/09/a-generation-of-adolescents-might-suffer-because-of-unregulated-social-media-suggests-new-research/?sh=12938d0e6200.

[9] Julie Jargon, *TikTok Brain Explained: Why Some Kids Seem Hooked on Social Video Feeds*, WSJ: FAMILY & TECH (Apr. 2, 2022), https://www.wsj.com/articles/tiktok-brain-explained-why-some-kids-seem-hooked-on-social-video-feeds-11648866192.

[10] *Id.*

[11] John Koetsier, *Digital Crack Cocaine: the Science Behind TikTok's Success*, FORBES (Jan. 18, 2020), https://www.forbes.com/sites/johnkoetsier/2020/01/18/digital-crack-cocaine-the-science-behind-tiktoks-success/?sh=5eb3e59e78be.

features are particularly dangerous for young users who are served content by TikTok that promotes unsafe—even fatal—behavior.[12]

TikTok is also very aware of the harm it has caused.[13] As TikTok Inc.'s chief executive officer previously admitted: "We've also invested a significant amount in understanding the issues that could arise from . . . teenage use."[14] That is why in other countries, TikTok prohibits children under the age of thirteen from using its platform and implements additional youth-protective measures. For example, Douyin, the Chinese version of TikTok, protects children under the age of fourteen by implementing: (1) 40-minute daily time limits; (2) blackout periods every night between 10 pm and 6 am, (3) five-second pauses between videos when the app shows reminders like "put down the phone," "go to bed," and (4) adjusted algorithms that insert educational videos in the "for you" feed.[15] These measures limit the amount of time youth spend on Douyin. But in the *Amici* States 16% of teen users say they use TikTok "almost constantly."[16]

All attorneys general have a duty to protect their citizens from unfair, unconscionable, and deceptive acts and practices. The multistate group has overwhelming reason to believe that TikTok

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[12] *See, e.g.*, David Klepper, *Report: TikTok boosts posts about eating disorders, suicide*, AP NEWS (Dec. 14, 2022), https://apnews.com/article/technology-health-eating-disorders-center-teens-0C8AE73F44926FA3DAF66BD7CAF3AD43; *see also* Travers, *supra* note 8.

[13] The documents TikTok has produced to the States only heighten these concerns and reinforce the *Amici* States' belief that TikTok is well aware of the harm it is causing to our youth. Based on the parties' present confidentiality agreements the States have not included any of these documents in this filing. Tennessee has included several confidential documents in its own filing and the *Amici* States would be happy to provide supporting documents *in camera*.

[14] *TikTok C.E.O. Shou Chew on China, the Algorithm and More*, N.Y. TIMES EVENTS (Nov. 30, 2022), https://youtu.be/EE5Pcz99JFI?t=861.

[15] Andrew Kantrowitz, *5 Ways China Is Trying to Unaddict Kids From Social Media*, CMS WIRE (Nov. 29, 2021), https://www.cmswire.com/digital-experience/5-ways-china-is-trying-to-unaddict-kids-from-social-media/.

[16] 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/.

is engaged in such unlawful practices and TikTok's current refusal to comply with its obligations to produce relevant information to the Tennessee Attorney General only heightens these concerns.

B. The information sought by Tennessee is crucial to the multistate group's understanding of TikTok's deceptive, unfair, and unconscionable conduct.

The information sought by Tennessee is highly relevant to the ongoing multistate investigation. The Lark application—effectively, TikTok's internal instant-messaging platform—is a primary method by which TikTok employees communicate internally. Tenn. Memo. of Law, pp. 5-6. These chats presumably contain the contemporaneous thoughts of the people with the most insight into TikTok's design and algorithmic decisions and TikTok's understanding of the consequences of such decisions. It is hard to think of information more relevant to understanding TikTok's intent towards youth and whether its public statements about these design and algorithmic decisions were accurate and complete. TikTok's apparent failure to preserve certain Lark content after the start of this investigation and its refusal to produce this content in a readable format frustrates the core aims of the states' investigation.

A court order is particularly appropriate here based on TikTok's conduct—and apparent opinion that the normal rules of document preservation and production do not apply to the Company. TikTok has long known of the states' investigation and its obligations under the states' Investigative Subpoenas to preserve evidence. Tenn. Memo. of Law, p. 4. Yet from what the states can tell, the Company has not taken appropriate measures to remedy preservation issues *it knew* had infected the Lark application. Tenn. Memo. of Law, pp. 9-10 (describing a Forbes report that TikTok knew it was incapable of "assur[ing] even basic custodian-by-custodian preservation of communications that represent crucially important investigative evidence[.]")[17]

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[17] *See also* Emily Baker-White, *TikTok Couldn't Ensure Accurate Responses to Government Inquiries, A ByteDance Risk Assessment Said*, Forbes (Nov. 28, 2022),

TikTok's refusal to produce the messages that it did retain in a reasonably usable format similarly requires this Court's swift intervention. As described in Tennessee's motion, the Lark chats that TikTok did produce are in a format that makes it difficult (if not impossible) for reviewers to piece together who read certain chats and the responses to those chats. Rather than correcting this deficiency, TikTok has argued that complying with its obligations to produce Lark messages in a reasonably usable format would be unduly burdensome. These issues in turn increase the cost and time to review the chats, slow the investigation, and delay the multistate group's efforts to remedy the harms that TikTok has inflicted—while rendering the messages nearly impossible to use as exhibits in depositions or at trial.

V. CONCLUSION

The Court should grant Tennessee's motion and compel compliance with Tennessee's requests for information.

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https://www.forbes.com/sites/emilybaker-white/2022/11/28/tiktok-inaccurate-government-inquiries-internal-bytedance-risk-assessment/?sh=475797e623fe.

Dated: March 6, 2023

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