

1 Laura Marquez-Garrett, SBN 221542
2 laura@socialmediavictims.org
3 Sydney Lottes, SBN 345387
4 sydney@socialmediavictims.org
5 SOCIAL MEDIA VICTIMS LAW CENTER
6 520 Pike Street, Suite 1125
7 Seattle, WA 98101
8 Ph: 206-741-4862

Electronically FILED by
Superior Court of California,
County of Los Angeles
7/25/2023 5:32 PM
David W. Slayton,
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Attorneys for Plaintiffs

[Additional counsel appear on signature page.]

IN THE SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

P.F., individually and on behalf of A.F.; N.L.
individually and on behalf of L.L.; K.K.,
individually and on behalf of S.K. and A.K.;
Keanna Glenn-Mills; Karen Glenn, individually
and on behalf of K.G.M.; D.M., individually
and on behalf of S.M.,

Plaintiff(s),

v.

Meta Platforms, Inc.; Instagram, LLC;
Facebook Payments, Inc.; Siculus, Inc.;
Facebook Operations, LLC; Snap, Inc.;
Bytedance, Ltd.; Bytedance, Inc; TikTok, Ltd.;
TikTok, LLC; TikTok, Inc.; Alphabet Inc.;
Google LLC; YouTube, LLC,

Defendant(s).

CIVIL ACTION NO. 23SM CV 03371

COMPLAINT

JURY DEMAND

1 **I. INTRODUCTION**

2 1. American children are suffering an unprecedented mental health crisis fueled by
3 Defendants’ addictive and dangerous social media products.

4 2. In the past decade, Americans’ engagement with social media grew exponentially,
5 nowhere more dramatically than among our country’s youth. That explosion in usage is no accident.
6 It is the result of Defendant(s) META PLATFORMS, INC., INSTAGRAM, LLC. FACEBOOK
7 PAYMENTS, INC., SICULUS, INC., FACEBOOK OPERATIONS, LLC (collectively, “Meta”);
8 SNAP, INC. (“Snap”); BYTEDANCE, LTD., BYTEDANCE, INC, TIKTOK, LTD., TIKTOK,
9 LLC, TIKTOK, INC. (collectively, “ByteDance” or “TikTok”); ALPHABET INC.; GOOGLE
10 LLC; YOUTUBE, LLC (collectively, “Google” or “YouTube”) studied efforts to induce young
11 people to compulsively use their products, Instagram, Snapchat, TikTok, and YouTube. Borrowing
12 heavily from the behavioral and neurobiological techniques used by slot machines and exploited by
13 the cigarette industry, Defendants deliberately embedded in their products an array of design
14 features aimed at maximizing youth engagement to drive advertising revenue. Defendants know
15 children are in a developmental stage that leaves them particularly vulnerable to the addictive effects
16 of these features. Defendants target them anyway, in pursuit of additional profit.

17 3. The defects in Defendants’ products vary by platform, but all exploit children and
18 adolescents. They include but are not limited to an algorithmically-generated, endless feed to keep
19 users scrolling in an induced “flow state;” “intermittent variable rewards” that manipulate dopamine
20 delivery to intensify use; “trophies” to reward extreme usage; metrics and graphics to exploit social
21 comparison; incessant notifications that encourage repetitive account checking by manufacturing
22 insecurity; inadequate, essentially illusory age verification protocols; and deficient tools for parents
23 that create the illusion of control.

24 4. The resulting ubiquity of Defendants’ products in the lives and palms of our kids,
25 and the ensuing harm to them, is hard to overstate. Today, over a third of 13 to 17-year-old kids
26 report using at least one of Defendants’ apps “almost constantly” and admit this is “too much.” Yet
27 more than half of these kids report that they would struggle to cut back on their social media use.
28 Instead of feeding coins into machines, kids are feeding Defendants’ platforms with an endless

1 supply of attention, time, and data.

2 5. Defendants' choices have generated extraordinary corporate profits—and yielded
3 immense tragedy. Suicide rates for youth are up an alarming 57%. Emergency room visits for
4 anxiety disorders are up 117%. In the decade leading up to 2020, there was a 40% increase in high
5 school students reporting persistent sadness and hopelessness, and a 36% increase in those who
6 attempted to take their own lives. In 2019, one in five high school girls had made a suicide plan. In
7 2021, one in three girls seriously considered attempting suicide. Children and their parents and
8 guardians across the country have struggled to cope with the severe, lasting damage visited on their
9 families by anxiety, depression, addiction, eating disorders, self-harm, suicidality, and the loss of
10 outliving one's child.

11 6. This lawsuit follows on a growing body of scientific research, including Defendants'
12 own internal (previously concealed) studies, that draws a direct line between Defendants' conscious,
13 intentional design choices and the youth mental health crisis gripping our nation. Defendants and
14 their products have rewired how our kids think, feel, and behave. Disconnected "Likes" have
15 replaced the intimacy of adolescent friendships. Mindless scrolling has displaced the creativity of
16 play and sport. While presented as "social," Defendants' products have in myriad ways promoted
17 disconnection, disassociation, and a legion of resulting mental and physical harms.

18 7. The U.S. Surgeon General recently explained that children versus Big Tech is "just
19 not a fair fight."¹ "You have some of the best designers and product developers in the world who
20 have designed these products to make sure people are maximizing the amount of time they spend
21 on these platforms. And if we tell a child, use the force of your willpower to control how much time
22 you're spending, you're pitting a child against the world's greatest product designers."

23 8. Over the past decade, Defendants have relentlessly pursued a strategy of growth-at-
24 all-costs, recklessly ignoring the impact of their products on children's mental and physical health
25
26
27
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¹ Allison Gordon & Pamela Brown, *Surgeon General says 13 is 'too early' to join social media*, CNN (Jan. 29, 2023), <https://www.cnn.com/2023/01/29/health/surgeon-general-social-media/index.html>. Exhibits and referenced materials are incorporated in this *Master Complaint* as if fully stated herein.

1 and well-being. In a race to corner the “valuable but untapped” market of tween and teen users, each
2 Defendant designed product features to promote repetitive, uncontrollable use by kids.²

3 9. Adolescents and children are central to the Defendants’ business models. These age
4 groups are highly connected to the Internet, more likely to have social media accounts, and more
5 likely to devote their downtime to social media usage. Additionally, youth influence the behavior
6 of their parents and younger siblings. As one Defendant put it, “los[ing] the teen foothold in the
7 U.S.” would mean “los[ing] the pipeline” for growth.³

8 10. Recognizing the power of engaging young users, Defendants deliberately tweaked
9 the design and operation of their apps to exploit the psychology and neurophysiology of kids.
10 Because children’s and adolescents’ brains are not fully developed, they lack the same emotional
11 maturity, impulse control, and psychological resiliency as adults. As a result, they are uniquely
12 susceptible to addictive features in digital products and highly vulnerable to the consequent harms.
13 Knowing this, Defendants wrote code designed to manipulate dopamine release in children’s
14 developing brains and, in doing so, create compulsive use of their apps.
15

16 11. Defendants’ strategy paid off. Users of their products now number in the billions,
17 and the frequency and time spent by these users has grown exponentially. This has allowed
18 Defendants to harvest a vast amount of personal user data—from the school you attend, to the
19 sneakers you covet, to the places you’ve been and the people you’ve met. This, in turn, has allowed
20 Defendants to mint a fortune, by selling to others the ability to micro-target advertisements to
21 incredibly narrow slices of the public.⁴

22 12. Defendants’ growth has come at the expense of its most vulnerable users: children
23 around the world, including Plaintiffs, who they cultivated and exploited. Plaintiffs are not merely
24 the collateral damage of Defendants’ products. They are the direct victims of the intentional product
25

26 ² Georgia Wells & Jeff Horwitz, *Facebook’s Effort to Attract Preteens Goes Beyond Instagram Kids, Documents*
27 *Show*, Wall St. J. (Sept. 28, 2021), [https://www.wsj.com/articles/facebook-instagram-kids-tweens-attract-](https://www.wsj.com/articles/facebook-instagram-kids-tweens-attract-11632849667)
28 [11632849667](https://www.wsj.com/articles/facebook-instagram-kids-tweens-attract-11632849667); see also Haugen_00022339.

³ Sheera Frenkel et al., *Instagram Struggles with Fears of Losing Its ‘Pipeline’: Young Users*, N.Y. Times (Oct. 26,
2021), available at <https://www.nytimes.com/2021/10/16/technology/instagram-teens.html>.

⁴ See Snap, Inc., 2022 Annual Report (Form 10-K) at 15 (Jan. 31, 2023) (“[W]e rely heavily on our ability to collect
and disclose data[] and metrics to our advertisers so we can attract new advertisers and retain existing advertisers. Any
restriction or inability, whether by law, regulation, policy, or other reason, to collect and disclose data and metrics
which our advertisers find useful would impede our ability to attract and retain advertisers.”).

1 design choices made by each Defendant. They are the intended targets of the harmful features that
2 pushed them into self-destructive feedback loops.

3 13. As a direct result of Defendants’ successful promotion of their defective products,
4 the rates of mental health issues among children have climbed steadily since 2010. By 2018, suicide
5 was the second leading cause of death for youth.⁵

6 14. Weeks later, the U.S. Surgeon General issued an advisory “to highlight the urgent
7 need to address the nation’s youth mental health crisis.”⁶ In a scathing rebuke of the assault on our
8 children, the Surgeon General recognized the dangerous designs in Defendants’ products and
9 Defendants’ abdication of responsibility for the resulting harms:

10 In these digital public spaces, which are privately owned and tend to
11 be run for profit, there can be tension between what’s best for the
12 technology company and what’s best for the individual user or for
13 society. Business models are often built around maximizing user
14 engagement as opposed to safeguarding users’ health and ensuring
15 that users engage with one another in safe and healthy ways
16 **[T]echnology companies must step up and take responsibility for
creating a safe digital environment for children and youth.** Today,
most companies are not transparent about the impact of their products,
which prevents parents and young people from making informed
decisions and researchers from identifying problems and solutions.⁷

17 15. The Surgeon General’s comments have since been echoed by President Biden
18 himself. In both his 2022 and 2023 State of the Union Addresses, the President urged the nation to
19 “hold social media platforms accountable for the national experiment they’re conducting on our
20 children for profit.”⁸ In a January 11, 2023 op-ed, President Biden amplified this point: “The risks
21 Big Tech poses for ordinary Americans are clear. Big Tech companies collect huge amounts of data
22 on the things we buy, on the websites we visit, on the places we go and, most troubling of all, on
23
24

25 ⁵ CDC, *Deaths: Leading Causes for 2018*, 70(4) National Vital Statistics Reports at 10 (May 17, 2021),
26 <https://www.cdc.gov/nchs/data/nvsr/nvsr70-04-508.pdf>.

27 ⁶ Press Release, U.S. Dep’t Health & Hum. Servs., *U.S. Surgeon General Issues Advisory on Youth Mental Health
Crisis Further Exposed by COVID-19 Pandemic* (Dec. 7, 2021), <https://www.hhs.gov/about/news/2021/12/07/us-surgeon-general-issues-advisory-on-youth-mental-health-crisis-further-exposed-by-covid-19-pandemic.html>.

28 ⁷ U.S. Surgeon General’s Advisory, *Protecting Youth Mental Health* (Dec. 7, 2021),
<https://www.hhs.gov/sites/default/files/surgeon-general-youth-mental-health-advisory.pdf> (emphasis in original).

⁸ The White House, President Biden’s State of the Union Address (Mar. 1, 2022), <https://www.whitehouse.gov/state-of-the-union-2022/>; see also The White House, *President Biden’s State of the Union Address* (Feb. 7, 2023),
<https://www.whitehouse.gov/state-of-the-union-2023/>.

our children.”⁹ The President observed that “millions of young people are struggling with bullying, violence, trauma and mental health” as a result of Defendants’ conduct and products, and again stated that “[w]e must hold social-media companies accountable” for their role in this crisis.¹⁰

16. These statements by President Biden and the Surgeon General are in line with a substantial body of peer-reviewed scientific literature documenting the harmful impact that Defendants’ apps have on our children, including the various injuries suffered by Plaintiffs. This body of research demonstrates that Defendants’ defectively designed products can cause the harms Plaintiffs suffer: addiction, compulsive use, anxiety, depression, eating disorders, body dysmorphia, self-harm, sexual exploitation, suicidal ideations, other serious diseases and injuries, and suicide itself. Overall rates of these disorders have increased greatly because of widespread consumption of Defendants’ products by children in this country and across the world.

17. Defendants knew or should have known about the risks of such addiction—which at least one Defendant euphemistically calls “problematic use.” They could have changed their products to avoid the harm. They could have warned the public and Plaintiffs about the danger. Instead, Defendants placed growth first.

18. Plaintiffs P.F., individually and on behalf of A.F., N.L., individually and on behalf of L.L., K.K., individually and on behalf of S.K. and A.K., Keanna Glenn-Mills, and Karen Glenn, individually and on behalf of K.G.M., and D.M., individually and on behalf of S.M., bring this action for personal injuries against Defendants for injuries caused because of use of Defendants’ wrongful conduct, including: (a) designing defective products that caused serious injuries to users; (b) failing to provide adequate warnings about serious and reasonably foreseeable health risks from use of the products; (c) failing to utilize reasonable care in, among other things, developing, designing, managing, operating, testing, producing, labeling, marketing, advertising, promoting, controlling, selling, supplying, and distributing their products; and (d) engaging in the deliberate

⁹ Joe Biden, *Republicans and Democrats, Unite Against Big Tech Abuses*, Wall St. J. (Jan. 11, 2023), <https://www.wsj.com/articles/unite-against-big-tech-abuses-social-media-privacy-competition-antitrust-children-algorithm-11673439411>.

¹⁰ Joe Biden, *Republicans and Democrats, Unite Against Big Tech Abuses*, Wall St. J. (Jan. 11, 2023), <https://www.wsj.com/articles/unite-against-big-tech-abuses-social-media-privacy-competition-antitrust-children-algorithm-11673439411>.

concealment, misrepresentation, and obstruction of public awareness of serious health risks to users of its products.

II. THE PARTIES

A. PLAINTIFFS

19. This Complaint is filed by and on behalf of children who suffered personal injuries due to their use of Defendants' products and, where applicable, their parents, guardians, spouses, children, siblings, and close family members, who suffered loss of society and other injuries as a consequence of the harms to Plaintiffs (collectively, "Plaintiffs").

20. Plaintiffs have suffered various personal injuries because of their use of Defendants' products. Plaintiffs have been harmed as a direct and proximate result of Defendants' wrongful conduct. These harms include pain, suffering, disability, impairment, disfigurement, death, an increased risk of injury and other serious illnesses, loss of enjoyment of life, loss of society, aggravation or activation of preexisting conditions, scarring, inconvenience, incurred costs for medical care and treatment, loss of wages and wage-earning capacity, and other economic and non-economic damages, as set forth herein. These losses are often permanent and continuing in nature.

21. Plaintiffs expressly disaffirm any contract they may have made with Defendants, or that Defendants may claim they made with them, before reaching the age of majority, as they lacked capacity to contract.

22. Plaintiffs also expressly disaffirm any contract they may have made with any of the Defendants, or that Defendants may claim they made with them, after reaching the age of majority, because Plaintiffs' continued use of Defendants' products was compulsive and due to addiction, not an affirmation of any contract.

B. DEFENDANTS

23. The defendants identified in this section are collectively referred to as "Defendants" throughout this Complaint.

1. Meta

24. Defendant Meta Platforms, Inc. ("Meta Platforms") is a Delaware corporation and multinational technology conglomerate. Its principal place of business is in Menlo Park, CA.

1 25. Meta Platforms’ subsidiaries include, but may not be limited to, the entities identified
2 in this section, as well as a dozen others whose identity or involvement is presently unclear.

3 26. Defendant Facebook Payments, Inc. (“Facebook 1”) is a wholly owned subsidiary of
4 Meta Platforms that was incorporated in Florida on December 10, 2010. Facebook 1 manages,
5 secures, and processes payments made through Meta Platforms, among other activities. Its principal
6 place of business is in Menlo Park, CA.

7 27. Defendant Siculus, Inc. (“Siculus”) is a wholly owned subsidiary of Meta Platforms
8 that was incorporated in Delaware on October 19, 2011. Siculus constructs data facilities to support
9 Meta Platforms’ products. Its principal place of business is in Menlo Park, CA.

10 28. Defendant Facebook Operations, LLC (“Facebook 2”) is a wholly owned subsidiary
11 of Meta Platforms that was incorporated in Delaware on January 8, 2012. Facebook 2 is likely a
12 managing entity for Meta Platforms’ other subsidiaries. Meta Platforms is the sole member of this
13 LLC, whose principal place of business is in Menlo Park, CA.

14 29. Defendant Instagram, LLC (“Instagram, LLC”) launched an app called Instagram in
15 October 2010. On or around April 7, 2012, Meta Platforms purchased Instagram, LLC for over one
16 billion dollars and reincorporated the company in Delaware. Meta Platforms is the sole member of
17 this LLC, whose principal place of business is in Menlo Park, CA.

18 30. Meta Platforms, Instagram, Siculus, Facebook 1, and Facebook 2 are referred to
19 jointly as “Meta.”
20

21 31. Meta owns, operates, controls, produces, designs, maintains, manages, develops,
22 tests, labels, markets, advertises, promotes, supplies, and distributes digital products available
23 through mobile- and web-based applications (“apps”), including Instagram and Facebook (together,
24 “Meta products”); Messenger; and Messenger Kids. Meta’s apps and devices are widely distributed
25 to consumers throughout the United States.

26 **2. Snap**

27 32. Defendant Snap Inc. (“Snap”) is a Delaware corporation. Its principal place of
28 business is in Santa Monica, CA.

33. Snap owns, operates, controls, produces, designs, maintains, manages, develops, tests, labels, markets, advertises, promotes, supplies, and distributes the app Snapchat. Snapchat is widely available to consumers throughout the United States.

3. **ByteDance**

34. Defendant ByteDance Ltd. is a global company incorporated in the Cayman Islands. Its principal place of business is in Beijing, China. ByteDance Ltd. also maintains offices in the United States, Singapore, India, and the United Kingdom, among other locations.

35. ByteDance Ltd. wholly owns its subsidiary Defendant ByteDance Inc., a Delaware corporation whose principal place of business is in Mountain View, CA.

36. ByteDance Ltd.'s key Chinese subsidiary is Beijing Douyin Information Service Limited, f/k/a Beijing ByteDance Technology Co. Ltd. ("Beijing ByteDance").¹¹ Beijing ByteDance owns, operates, and holds key licenses to Douyin, the Chinese version of TikTok. On or around April 30, 2021, the Chinese government took a 1% stake in, and received one of three seats on the board of directors of, Beijing ByteDance.¹² Specifically, 1% of Beijing ByteDance is now owned by WangTouZhongWen (Beijing) Technology, which in turn is owned by China Internet Investment Fund (China's top Internet regulator and censor), China Media Group (China's national broadcaster, controlled by the Chinese Communist Party's propaganda department), and the Beijing municipal government's investment arm.

37. ByteDance Ltd. wholly owns its subsidiary Defendant TikTok, Ltd., a Cayman Island corporation with its principal place of business in Shanghai, China.

38. TikTok, Ltd. wholly owns its subsidiary Defendant TikTok, LLC which is, and at all relevant times was, a Delaware limited liability company.

¹¹ See Sophie Webster, *ByteDance Changes Names of Subsidiaries to Douyin, Speculated to be Mulling an IPO*, Tech Times (May 8, 2022), available at <https://www.techtimes.com/articles/275188/20220508/bytedance-changes-names-subsidiaries-douyin-speculated-mulling-ipo.htm>.

¹² See Juro Osawa & Shai Oster, *Beijing Tightens Grip on ByteDance by Quietly Taking Stake, China Board Seat*, The Information (Aug. 16, 2021), available at <https://www.theinformation.com/articles/beijing-tightens-grip-on-bytedance-by-quietly-taking-stake-china-board-seat?rc=ubpicg>.

1 39. TikTok, LLC wholly owns its subsidiary Defendant TikTok, Inc. f/k/a Musical.ly,
2 Inc. (“TikTok, Inc.”), a California corporation with its principal place of business in Culver City,
3 CA.

4 40. Defendants TikTok, Ltd.; TikTok, LLC; TikTok, Inc.; ByteDance Ltd.; and
5 ByteDance Inc. are referred to jointly as “ByteDance.”

6 41. ByteDance owns, operates, controls, produces, designs, maintains, manages,
7 develops, tests, labels, markets, advertises, promotes, supplies, and distributes the app TikTok.
8 TikTok is widely available to consumers throughout the United States.

9 **4. Google**

10 42. Google Inc. was incorporated in California in September 1998 and reincorporated in
11 Delaware in August 2003. In or around 2017, Google Inc. converted to a Delaware limited liability
12 company, Defendant Google, LLC (together with its predecessor-in-interest Google Inc.,
13 “Google”). Google’s principal place of business is in Mountain View, CA.

14 43. Since 2006, Google has operated, done business as, and wholly owned as its
15 subsidiary Defendant YouTube, LLC (“YouTube, LLC”). YouTube, LLC is a Delaware limited
16 liability company with its principal place of business in San Bruno, CA. YouTube is widely
17 available to consumers throughout the United States.¹³

18 44. On October 2, 2015, Google reorganized and became a wholly owned subsidiary of
19 a new holding company, Alphabet Inc., a Delaware corporation with its principal place of business
20 in Mountain View, CA.

21 45. Google, LLC and YouTube, LLC (together, “Google”) are alter egos of one another:
22 together and in concert they own, operate, control, produce, design, maintain, manage, develop, test,
23 label, market, advertise, promote, supply, and distribute the app YouTube.

24 **III. JURISDICTION AND VENUE**

25 46. This Court has personal jurisdiction over Defendants because they are incorporated
26 in and have their principal places of business in California, and because they have contacts with
27

28

¹³ See, e.g., Alphabet Inc., *Form 10-Q*, Oct. 25, 2022, at 4 (defining Alphabet as “Alphabet Inc. and its subsidiaries.”),
available at <https://www.sec.gov/Archives/edgar/data/1652044/000165204422000090/goog-20220930.htm>.

1 California that are so continuous and systematic that they are essentially at home in this state. All
2 Defendants regularly conduct and solicit business in California, provide products and/or services by
3 or to persons here, and derive substantial revenue from the same. All Defendants affirmatively and
4 extensively engage with a significant percentage of this State's residents through messages,
5 notifications, recommendations, and other communications.

6 47. There is no federal jurisdiction in this case. All claims are brought pursuant to
7 California state law. There are no federal causes of action and Plaintiff expressly disclaim any
8 federal causes of action.

9 48. Venue is proper in Los Angeles County because one or more defendants are
10 headquartered here and/or one or more Plaintiffs reside here; in addition, Plaintiffs will be relating
11 this case to and filing a Short Form Complaint in Judicial Council Coordination Proceeding No.
12 5255 ("JCCP 5255"), which proceeding is pending in Los Angeles County.

13 **IV. FACTUAL ALLEGATIONS SPECIFIC TO EACH DEFENDANT**

14 **A. GENERAL FACTUAL ALLEGATIONS APPLICABLE TO ALL**
15 **DEFENDANTS**

16 49. On May 15, 2023, a Master Complaint was filed in JCCP 5255, on May 15, 2023
17 ("Master Complaint"), in Los Angeles County Superior Court. Plaintiffs hereby incorporate and
18 adopt Sections IV.A.1 through IV.A.7 of the Master Complaint as though set forth in full herein.

19 **B. FACTUAL ALLEGATIONS AS TO META**

20 50. Plaintiffs hereby incorporate and adopt Section IV.B (and all applicable subsections)
21 of the Master Complaint as though set forth in full herein.

22 **C. FACTUAL ALLEGATIONS AS TO SNAP**

23 51. Plaintiffs hereby incorporate and adopt Section IV.C (and all applicable subsections)
24 of the Master Complaint as though set forth in full herein.

25 **D. FACTUAL ALLEGATIONS AS TO TIKTOK**

26 52. Plaintiffs hereby incorporate and adopt Section IV.D (and all applicable subsections)
27 of the Master Complaint as though set forth in full herein.

28 **E. FACTUAL ALLEGATIONS AS TO GOOGLE**

53. Plaintiffs hereby incorporate and adopt Section IV.E (and all applicable subsections)

of the Master Complaint as though set forth in full herein.

V. PLAINTIFF SPECIFIC FACTUAL ALLEGATIONS

A. A.F.

54. Plaintiffs P.F. and A.F. assert claims against the Meta and TikTok Defendants, in connection with the Instagram and TikTok products.

55. A.F. currently is 17, and lives in California.

56. A.F. got her first cell phone at age 13, when she was living with her mother. She is believed to have opened her first Instagram and TikTok accounts shortly thereafter. A.F. began suffering severe mental health harms as the result of her use of TikTok and Instagram within a year after such use began.

57. Prompted by the addictive design of the Instagram and TikTok products, and the constant notifications that Meta and TikTok pushed to her 24 hours a day, A.F. developed a compulsion to engage with those products and began getting less sleep, engaging less with family and friends, and otherwise losing interest in the world around her.

58. Within a year of when her use started, A.F. began having trouble sleeping. The issues grew worse over time, resulting in severe sleep deprivation and related mental health harms such as anxiety, depression, self-harm, and suicidal ideation.

59. At all times relevant, these Defendants knew that minor Plaintiff A.F. was accessing their products in the middle of the night and the mental and physical health harms such access was likely to cause. They did not notify her parents and continued distributing their products to her regardless.

60. When Plaintiff P.F. tried to exercise his parental rights by restricting A.F.'s access to Defendants' products, she had uncharacteristic and extreme reactions, including physical violence. She felt like she could not live without Defendants' products. Her dependency on these products was so extreme that, on one occasion, A.F. attempted suicide after and because her father took away her phone.

61. For example, Defendant Meta targeted her with Artificial Intelligence (AI) driven user recommendation tools, affirmatively facilitating and creating connections between minor

1 Plaintiff A.F. and complete strangers, including predatory adults and others she did not know in real
2 life and would not have met but for the seemingly random connections Meta made.

3 62. Defendants Meta and TikTok also targeted A.F. with AI driven feed-based tools.
4 This included targeting A.F. with harmful social comparison, as well as depressive content, drug
5 advertisements, and content urging A.F. to commit acts of self-harm. On information and belief,
6 these are connections and content A.F. did not seek out or even want to see when her use of
7 Defendants' products first began.

8 63. Neither P.F. nor A.F. knew or had reason to know about Defendants' defective and/or
9 inherently dangerous products, features, and/or tools, and that they were using such products,
10 features, and/or tools in an exploitative and harmful manner.

11 64. Defendants' knowing and deliberate product design, marketing, distribution,
12 programming and operational decision and conduct caused serious emotional, mental, and physical
13 harms to A.F. and her family. Those harms include, but are not limited to, addiction, sleep
14 deprivation, anxiety, depression, exploitation, self-harm, and suicidal ideation.

15 65. A.F. also began engaging in negative social comparison as a direct result of the
16 designs of each Defendant's relevant product. For example Instagram's "like" button and
17 comparable features on the TikTok product. For example, A.F. would become anxious and
18 depressed leading up to and after each of her postings to her social media accounts, afraid that she
19 wouldn't get enough likes and/or would not be good enough or likeable enough. As time went on,
20 A.F. began to feel worse about herself. She obsessed over likes and reactions every time she posted,
21 yet still, she posted more in hopes of getting likes. She also began to worry over her weight and
22 appearance for the first time in her life.

23 66. The more A.F. accessed Defendants' products, the worse her mental health became.

24 67. As a result of A.F.'s extensive and problematic use of Instagram and TikTok, she
25 developed numerous health conditions that she will struggle with for many years to come. Such
26 harms caused unnecessary hardship and emotional and financial harms to her father, Plaintiff P.F.
27 Thankfully, A.F. is working hard to turn her life around and to recover from what Defendants did
28 to her and continue doing to millions of other children to this day.

1 **B. L.L.**

2 68. Plaintiffs N.L. and L.L. assert claims against the Meta, Snap, TikTok, and Google,
3 Defendants, in connection with the Instagram, Snapchat, TikTok, and YouTube products.

4 69. L.L. currently is 17 years old, and lives in California.

5 70. She was a social and outgoing child, who excelled in school and talked about
6 someday becoming a lawyer or author.

7 71. L.L. got her first cell phone at age 10. Plaintiff N.L. is a single mother and wanted
8 to have some way to keep in touch with her child. She did not use social media herself, so was not
9 aware of and/or familiar with Defendants' social media products; but also, once she became vaguely
10 aware of them, she had no reason to think that there were different from every other, typical business
11 – that is, she reasonably believed that their products included safety features for minor users,
12 particularly since what little she did see was aimed at and targeted minor users as Defendants'
13 primary demographic. N.L. did not know about or consent to L.L.'s opening of any accounts with
14 Defendants, and for the above reasons, she had no reason to think that Defendants' were causing
15 harm to her child even when she became vaguely aware of their products.
16

17 72. L.L. is believed to have opened her first YouTube account and/or began using the
18 YouTube product (which allows for such use even without an account) when she was ten years old,
19 and began using Instagram, Snapchat, and TikTok when she was 12. In all instances, she did not
20 have N.L.'s permission.

21 73. L.L.'s use of Defendants' product coincided with mental health harms.

22 74. When L.L. was 12, she was accessing defendants' products about two hours each
23 day; however, prompted by the addictive design of the Instagram, Snapchat, TikTok, and YouTube
24 products, and the constant notifications that Meta, Snapchat, and TikTok began pushing to her 24
25 hours a day, she developed a compulsion to engage with those products nonstop.

26 75. By the time she was 14, L.L. was using Defendants' products every chance she got,
27 and she began getting less and less sleep – unable to turn off her phone because of the addictive
28 designs and mechanisms each of these defendants employed. At all times relevant, these Defendants
knew that minor Plaintiff L.L. was accessing their products in harmful and excessive amounts and

1 during harmful times of day and the mental and physical health harms such use was likely to cause.
2 They did not notify her parent and continued distributing their products to her regardless.

3 76. Then COVID started, which provided L.L. with even more time and opportunity to
4 use Defendants' products – which she did. L.L. began losing sleep, unable to turn off her phone
5 because of the addictive designs and mechanisms each of these defendants employed on her.

6 77. Defendants' knowing and deliberate product design, marketing, distribution,
7 programming and operational decision and conduct caused serious emotional, mental, and physical
8 harms to L.L. and her family. Those harms include, but are not limited to, addiction, sleep
9 deprivation, anxiety, depression, suicidality, and a life-threatening eating disorder.

10 78. All four of these Defendants began targeting L.L. via their AI driven feed-based
11 technologies with harmful comparison, body, and eating subject matters, advertisements, and
12 connections. This included targeting L.L. with harmful social comparison, as well as depressive
13 and disordered eating content, and advertisements focused on beauty, health, weight loss, and
14 similar topics.

15 79. These are subject matters L.L. did not seek out or even want to see; and Defendants
16 targeted her with them regardless, and for their own benefit.

17 80. The designs of TikTok and YouTube's products, for example, began flooding her
18 with messages like "how to be anorexic" and "what I eat in a day," as well as much darker themes,
19 like explaining why thin people are better and advocating that you should not be in this world if you
20 are not thin. Again, none of this are subject matters L.L. requested, sought out, or even wanted to
21 see when these Defendants' designs chose these subject matters for – and at the expense of her
22 mental and physical health.

23 81. L.L. went from being a happy person to someone who could not even bring herself
24 to get up off the couch, and who was afraid to eat. N.L. noticed the change almost immediately and
25 sought help. By May of 2020, it was clear that something was wrong, and L.L. admitted to both
26 having an eating disorder, and to not being able to stop herself because that was all Defendants'
27 were showing her on their platforms.
28

1 82. In July 2020, L.L. was diagnosed with anorexia A, and was admitted to the hospital
2 for ten days. She was sent home, then hospitalized again in October of 2020. Between April 2020
3 and October 2020, she had lost more than 60 pounds. In December of 2020, her mother finally was
4 able to get her into a residential treatment program and, currently, keeping L.L. alive is a daily battle
5 fought by both L.L. and her mother, N.L.

6 83. L.L. was unable to attend school and suffers from heart pains and panic attacks as
7 the result of these harms, caused by Defendants' design and programming decisions. To this day,
8 in fact, L.L. is too addicted to Defendants' products to stop using them completely – she feels as
9 though she cannot live without them – yet Defendants continue to target her with harmful disordered
10 eating content she does not want or request, only compounding the harms further.

11 84. Neither N.L. nor L.L. knew or had reason to know about Defendants' defective
12 and/or inherently dangerous products, features, and/or tools, and that they were using such products,
13 features, and/or tools in an exploitative and harmful manner.

14 85. The more A.F. accessed Defendants' products, the worse her mental health became.

15 86. As a result of L.L.'s extensive and problematic use of Instagram and TikTok, she
16 developed numerous health conditions – including but not limited to a life-threatening eating
17 disorder – that she still struggles with and will struggle with for many years to come. In fact, L.L.
18 recently spent twenty-eight days in a mental health facility. It is likely that L.L. will suffer long
19 term physical harms as the foreseeable result of the harms Defendants' caused her, as well, though
20 the full extent and impact are not yet known.

21 87. These harms also have inflicted unnecessary hardship and emotional and financial
22 harms on L.L.'s mother, N.L., including substantial harms to her business as well as harms to her
23 physical and mental health.

24 **C. S.K.**

25 88. Plaintiffs K.K. and S.K. assert claims against the Meta and TikTok Defendants, in
26 connection with the Instagram and TikTok products.

27 89. S.K. currently is 15 years old, and lives in California.

1 90. S.K. got her first cell phone around the time when the pandemic started, in early
2 2020, when she was 12. However, about a year prior to that, she got an iTouch.

3 91. S.K. opened her first Instagram and TikTok accounts sometime in 2019 and/or 2020,
4 which accounts were opened without Plaintiff K.K.'s knowledge or consent.

5 92. Once K.K. realized that her child was using the Instagram and TikTok products, she
6 did not think that there was any reason for concern. She began noticing Meta and TikTok's
7 advertising and representations more and was aware of their reputations, all of which informed her
8 that these products were safe and age-appropriate for her 12-year-old daughter.

9 93. K.K. believed TikTok's representations that it was all about short and silly dances
10 and understood that this was the product's only functionality – the posting and sharing of these
11 videos. She did not know or have reason to know that TikTok was providing direct messaging
12 products for use between minor children and adult strangers or collecting massive amounts of public
13 and private information from her underage child, which TikTok then used to target S.K. with
14 inherently harmful connections— all as the result of TikTok's engagement over safety product design
15 and programming decisions.

16 94. K.K. likewise believed Meta's representations that it was providing children with a
17 fun and safe environment, to exchange photos and connect with friends. She had a Facebook account
18 so generally was familiar with Meta products, but had no understanding or reason to know that Meta
19 also was affirmatively connecting minor children with adult strangers and, further, had designed and
20 was operating its Instagram product with both harmful social comparison tools and, in its feed-based
21 products, with a degree of algorithmic discrimination that resulted in the targeting of her underage
22 child with harmful social comparisons as well as dangerous user connection recommendations.

23 95. K.K. likewise was unaware that youth usage of these Defendants' products could
24 lead to addiction and other mental health harms. In fact, she relied on their reputation as established
25 and reputable social media companies, and their representations that their products were fun and
26 safe. She did not see nor was she aware of any information about the defective features identified in
27 this Complaint. Nor did she see any information about the risks of addiction or resulting physical
28 and mental health harms from usage of Instagram or TikTok.

1 96. Meta and TikTok publicly and repeatedly said that their products were safe for
2 children, and marketed to and advertised their products as having been designed with children in
3 mind. These omissions were material to K.K.'s decision to allow her child to continue using
4 Defendants' products and had Meta and TikTok publicly or privately disclosed the risks of harm
5 associated with their products defects, K.K. would have been aware of such disclosures and would
6 not have allowed such use to continue.

7 97. S.K.'s use of Instagram and TikTok coincided with a decline in her mental health.

8 98. Prompted by the addictive design of the Instagram and TikTok products, and the
9 constant notifications that Meta and TikTok began pushing to her 24 hours a day, S.K. developed a
10 compulsion to engage with those products nonstop; resulting in sleep deprivation, anxiety,
11 depression, and other mental health harms.

12 99. This included, for example, connecting S.K. to predatory adult strangers on both
13 platforms and then providing those strangers with means to message S.K. directly and without her
14 mother's knowledge or consent. It also included products designs that targeted S.K. with harmful
15 comparison, body, and eating subject matters, advertisements, and connections.

16 100. Meta and TikTok product designs targeted S.K. with harmful social comparison, as
17 well as depressive and disordered eating content, and advertisements focused on beauty, health,
18 weight loss, and similar topics.

19 101. As the result of these Meta and TikTok caused harms, S.K. developed a life-
20 threatening eating disorder and severe mental health harms she will struggle with for the rest of her
21 life. She stopped eating and developed severe feelings of self-loathing. She required (and still
22 requires) extensive medical treatment and has been unable to participate in physical activities she
23 once enjoyed, such as cheerleading, due to the physical and mental harms she still suffers. It is likely
24 that S.K. will suffer long term physical harms as the foreseeable result of the harms Defendants'
25 caused her, though the full extent and impact of such harms are not yet known.

26 102. Neither K.K. nor S.K. knew or had reason to know about Defendants' defective
27 and/or inherently dangerous products, features, and/or tools, and that they were using such products,
28 features, and/or tools in an exploitative and harmful manner.

1 103. The more S.K. accessed Meta and TikTok’s products, the worse her mental health
2 became.

3 104. These harms also have inflicted unnecessary hardship and emotional and financial
4 harms on S.K.’s mother, K.K.

5 105. S.K. went from being a relatively well-adjusted child to someone suffering from
6 severe mental and physical health harms, and all within a matter of years (if not months) from when
7 her use of the Instagram and TikTok products began. These harms were the direct and proximate
8 result of Defendants’ products and failures to warn.

9 **D. A.K.**

10 106. Plaintiffs K.K. and A.K. assert claims against the Meta and TikTok Defendants, in
11 connection with the Instagram product.

12 107. A.K. currently is 15 years old, and lives in California.

13 108. A.K. got her first cell phone around the time when the pandemic started, in early
14 2020, when she was 12. However, about a year prior to that, she got an iTouch.

15 109. S.K. opened her first Instagram and TikTok accounts sometime in 2019 and/or 2020,
16 which accounts were opened without Plaintiff K.K.’s knowledge or consent.

17 110. Once K.K. realized that her child was using the Instagram and TikTok products, she
18 did not think that there was any reason for concern. She began noticing Meta and TikTok’s
19 advertising and representations more and was aware of their reputations, all of which informed her
20 that these products were safe and age-appropriate for her 12-year-old daughter.

21 111. K.K. believed TikTok’s representations that it was all about short and silly dances
22 and understood that this was the product’s only functionality – the posting and sharing of these
23 videos. She did not know or have reason to know that TikTok was providing direct messaging
24 products for use between minor children and adult strangers or collecting massive amounts of public
25 and private information from her underage child, which TikTok then used to target S.K. with
26 inherently harmful connections and content – all as the result of TikTok’s engagement over safety
27 product design and programming decisions.
28

1 112. K.K. likewise believed Meta's representations that it was providing children with a
2 fun and safe environment, to exchange photos and connect with friends. She had a Facebook account
3 so generally was familiar with Meta products, but had no understanding or reason to know that Meta
4 also was affirmatively connecting minor children with adult strangers and, further, had designed and
5 was operating its Instagram product with both harmful social comparison tools and, in its feed-based
6 products, with a degree of algorithmic discrimination that resulted in the targeting of her underage
7 child with harmful social comparison content as well as dangerous user connection
8 recommendations.

9 113. At all times relevant, K.K. also was unaware that youth usage of these Defendants'
10 products could lead to addiction and other mental health harms. She relied on Meta and TikTok's
11 reputations as established and reputable social media companies, and their representations that their
12 products were fun and safe. She did not see nor was she aware of any information about the defective
13 features identified in this Complaint. Nor did she see any information about the risks of addiction
14 or resulting physical and mental health harms from usage of Instagram or TikTok.

15 114. Meta and TikTok publicly and repeatedly said that their products were safe for
16 children, and marketed to and advertised their products as having been designed with children in
17 mind. These omissions were material to K.K.'s decision to allow her child to continue using
18 Defendants' products and had Meta and TikTok publicly or privately disclosed the risks of harm
19 associated with their products defects, K.K. would have been aware of such disclosures and would
20 not have allowed such use to continue.

21 115. A.K.'s use of Instagram and TikTok coincided with a decline in her mental health.

22 116. Prompted by the addictive design of the Instagram and TikTok products, and the
23 constant notifications that Meta and TikTok began pushing to her 24 hours a day, S.K. developed a
24 compulsion to engage with those products nonstop; resulting in sleep deprivation, anxiety,
25 depression, and other mental health harms that Defendants not only foresaw but, at some point,
26 anticipated and/or knew to be occurring in young users like S.K.
27
28

117. As the result of these Meta and TikTok caused harms, A.K. developed serious mental health harms, including anxiety, depression, and low self-esteem. These are harms A.K. likely will struggle with for the rest of her life.

118. Neither K.K. nor A.K. knew or had reason to know about Defendants' defective and/or inherently dangerous products, features, and/or tools, and that Defendants were using such products, features, and/or tools in an exploitative and harmful manner.

119. The harms to A.K. were the direct and proximate result of Defendants products and failures to warn.

120. These harms have resulted in unnecessary hardship and emotional and financial harms to K.K. as well.

E. Keanna Glenn-Mills

121. Plaintiff Keanna Glenn-Mills asserts claims against the Meta, Snap, TikTok, and Google, Defendants, in connection with the Instagram, Snapchat, TikTok, and YouTube products.

122. Keanna currently is 20 years old and lives in California.

123. Keanna began using social media at age 12. Her mother, Plaintiff Karen Glenn, said no to social media and tried using third party software to prevent her daughter's use. However, Defendants design their products in a manner that enables children to evade parental consent, and Keanna was able to access Defendants' products regardless. Keanna began using Defendants' products without parental knowledge or consent, and Defendants knew or should have known, at times relevant to this complaint, that she was a minor.

124. Keanna's use of Instagram, Snapchat, TikTok, and YouTube coincided with a severe and near-fatal decline in her mental health.

125. Prompted by the addictive design of the Instagram, Snapchat, TikTok, and YouTube products, and the constant notifications that Meta, Snapchat, and TikTok began pushing to her 24 hours a day, she developed a compulsion to engage with those products nonstop. Keanna became severely dependent on these products to the point where she could not sleep at night, and often refused to go to school the next day. The resulting and foreseeable sleep deprivation led to increased anxiety, depression, and other mental health harms.

1 126. Keanna’s dependency was so severe that when her mother tried to exercise parental
2 authority and control by restricting access to Defendants’ products, Keanna would become out of
3 control even to the point of violence.

4 127. Almost immediately, Meta, Snap, and TikTok’s product designs targeted Keanna
5 with Artificial Intelligence (AI) user recommendation and connection tools, affirmatively
6 facilitating and creating connections between minor Plaintiff Keanna and complete strangers,
7 including predatory adults and others she did not know in real life and would not have met but for
8 the seemingly random connections these Defendants made.

9 128. Defendants made these dangerous activities appear and feel safe. Keanna was too
10 young to appreciate the fact that communicating directly with unknown adults via products like
11 Instagram, Snapchat, and TikTok was dangerous and could lead to incredible harms. Keanna
12 thought that she was safe behind a screen, and also, Defendants’ products made it seem like she
13 knew these strangers or that they were people she might want to meet; for example, Snapchat
14 included messages along with its recommendations to the effect that there were people Keanna
15 might know. Moreover, Meta, Snap, and TikTok designed their products to convince Keanna that
16 the more of Meta and Snap’s recommended strangers she accepted, the more popular she would be;
17 that is, these products pushed her to add as many “friends” as possible, increase her Snap Score, get
18 more “likes,” and other central features of these products that were designed to and did encourage
19 and facilitate the connection of dozens of predatory users to Keanna when she was still a pre-teen
20 and teen. And Keanna suffered exploitation and physical, emotional, and mental abuse as a result.

21 129. These were persons Keanna did not know in real life, were not searching for, and
22 would not have chosen to connect with had Meta, Snap, or TikTok given her that choice. At all
23 times relevant, they knew that they were making connections between minors and strangers and
24 chose to continue doing so despite actual knowledge of the types of harms they were causing.

25 130. At the same time, Defendants continued to tell consumers and their parents that their
26 products were safe and that they were using all available technologies to prevent these exact types
27 of abuses from occurring through and because of their platforms.
28

1 131. Defendants Meta, TikTok, and YouTube’s product designs also targeted Keanna
2 with AI feed-based tools. This included targeting her with harmful and depressive content, urging
3 Keanna to commit acts of self-harm, as well as harmful social comparison, body image, and
4 disordered eating content, normalizing and flooding her with disordered eating content as a means
5 of increasing their own revenue. And again, this is not why Keanna began using social media. She
6 did not open social media accounts looking to make harmful connections or exposures and was
7 shown content she did not initially seek out or want to see instead.

8 132. Defendants chose these subject matters for Keanna – a user they knew to be a female
9 adolescent – flooding her feed-based features with them as a matter of programming and product
10 design. Keanna and her mother did not know and had no reason or way to know about Defendants’
11 defective and/or inherently dangerous products, features, and/or tools, and that they were using such
12 products, features, and/or tools in an exploitative and harmful manner.

13 133. Defendants’ knowing and deliberate product design, marketing, distribution,
14 programming and operational decision and conduct caused serious emotional, mental, physical, and
15 financial harms to Keanna and her family. Those harms include, but are not limited to, dangerous
16 dependency on their products, sleep deprivation, anxiety, depression, exploitation, self-harm,
17 suicidal ideation, multiple life-threatening eating disorders, and the foreseeable, long-term physical,
18 emotional, and mental health harms resulting from the same.

19 134. The more Keanna accessed Defendants’ products, the worse her mental health
20 became.
21

22 135. On more than one occasion, Keanna almost died as the result of eating disorders and
23 other mental health harms Defendants (knowingly) caused through their product design and
24 programming decisions. She was in and out of hospitals almost daily at one point, before being
25 escalated to in-patient treatment. She had to miss a year of school, and the physical harms she
26 suffered became so severe that she went from being an A-student to needing books read to her
27 because she no longer could remember or comprehend. She suffers from long-term effects of hair
28 loss, heart issues, and very likely, will suffer for the rest of her life from physical harms.

1 136. For years, Keanna’s family and younger sister suffered the financial and emotional
2 consequences of these harms, and the trauma of worrying every day that they would lose her.
3 Plaintiff Karen Glenn was unable to work as Keanna’s treatment and survival became a full-time
4 job.

5 137. While the degree to which these harms will impact Keanna’s mental and physical
6 health long-term remains unknown, what is known is that she will need counseling and treatment
7 for many years to come and must now battle severe mental and physical health harms as a result of
8 Defendants’ defective and/or inherently harmful social media products.

9 **F. K.G.M.**

10 138. Plaintiffs Karen Glenn and K.G.M. assert claims against the Meta, Snap, and TikTok
11 Defendants, in connection with the Instagram, Snapchat, and TikTok products.

12 139. K.G.M. currently is 17 years old and lives in California.

13 140. K.G.M. began using social media at age 10. Her mother, Plaintiff Karen Glenn, said
14 no to social media and tried using third party software to prevent her daughter’s use. However,
15 Defendants design their products in a manner that enables children to evade parental consent, and
16 K.G.M. was able to access Defendants’ products regardless. K.G.M. began using Defendants’
17 products without parental knowledge or consent, and Defendants knew or should have known, at
18 times relevant to this complaint, that she was a minor.

19 141. K.G.M.’s use of Instagram, Snapchat, and TikTok coincided with a decline in her
20 mental health.

21 142. Prompted by the addictive design of the Instagram, Snapchat, and TikTok products,
22 and the constant notifications that Meta, Snapchat, and TikTok began pushing to her 24 hours a day,
23 she developed a compulsion to engage with those products nonstop.

24 143. Unbeknownst to Plaintiffs, including K.G.M., each of these Defendants utilized their
25 proprietary tools and made programming decisions aimed at targeting K.G.M.. For example, Meta
26 and Snap’s Artificial Intelligence (AI) user recommendation and connection tools affirmatively
27 facilitated and created connections between minor Plaintiff K.G.M. and complete strangers,
28

1 including predatory adults and others she did not know in real life and would not have met but for
2 the seemingly random connections these Defendants made.

3 144. Defendants Meta and TikTok's product designs also targeted K.G.M. with harmful
4 and depressive content, urging K.G.M. to commit acts of self-harm, as well as harmful social
5 comparison and body image. These are connections and content K.G.M. did not seek out or even
6 want to see; instead, these are the types of harms Defendants aimed at her in their efforts to prevent
7 her from looking away at any cost.

8 145. At one point, K.G.M. suffered bullying and sextortion via the Instagram product.
9 Plaintiffs never could determine whether the abuser was someone who knew K.G.M. in real life or
10 if it was a random stranger to whom Instagram connected her. However, when Plaintiffs reported
11 the sextortion attempt to Meta, as Meta instructs its users to do, Meta did nothing. Meta allowed
12 the predatory user to continue harming minor Plaintiff K.G.M., including through the use of explicit
13 images of a minor child. Meta's defective reporting mechanisms and/or deliberate failure to act
14 caused emotional and mental health harms to K.G.M. in addition to and separate from any third-
15 party conduct. In fact, it took K.G.M.'s friends and family spamming and asking other Instagram
16 users to report the persons targeting minor K.G.M. for a two-week period before Meta did anything
17 about the abuses, violation of terms, and illegal conduct of which it, by then, had full knowledge.
18

19 146. Neither K.G.M. nor her mother knew or had reason to know about Defendants'
20 defective and/or inherently dangerous products, features, and/or tools, and that they were using such
21 products, features, and/or tools in an exploitative and harmful manner.

22 147. Defendants' knowing and deliberate product design, marketing, distribution,
23 programming and operational decision and conduct caused serious emotional and mental harms to
24 K.G.M. and her family. Those harms include, but are not limited to, dangerous dependency on their
25 products, anxiety, depression, self-harm, and body dysmorphia.

26 148. The more K.G.M. accessed Defendants' products, the worse her mental health
27 became.
28

1 **G. S.M.**

2 149. Plaintiff D.M., on behalf of S.M., asserts claims against the Meta and TikTok
3 Defendants, in connection with the Instagram and TikTok products.

4 150. S.M. is seventeen years old and lives in California.

5 151. D.M. believes that S.M. opened her first Instagram when she was about nine, which
6 she opened without her parents' knowledge or consent. She eventually opened a TikTok account,
7 without her parents' knowledge or consent, and prior to turning 13.

8 152. S.M.'s parents were generally aware of Meta's representations about the safety and
9 age-appropriateness of its products, including Instagram, and resulting reputation. Because of how
10 Defendants design their products, her parents had no way of knowing when her use began or even
11 the ability to prevent such use; however, even once her use was discovered – a year or more after
12 the fact in the case of Instagram – they reasonably relied on Defendants' representations and
13 resulting reputation and, for that reason, had no reason to think that their minor child would be
14 harmed or put in any way at risk of harm from use of Defendants' products.
15

16 153. Relying on the information Meta and TikTok published and provided, D.M. believed
17 that Instagram and TikTok were safe and age-appropriate for her child's use. She also relied on
18 Defendants and their reputation as established and reputable social media companies. She did not
19 see nor were they aware of any information about the defective features identified in the Master
20 Complaint. Nor did she see any information about the risks of addiction or resulting physical and
21 mental health harms from usage of Instagram or TikTok, or that Meta and TikTok were targeting
22 children (young girls in particular) with disordered eating tutorials and connections. These
23 omissions were material to both S.M.'s decision to use these products and her parents' decision to
24 not take action to try to prevent such use once it was discovered.

25 154. Had Meta and TikTok publicly or privately disclosed the risks of harm associated
26 with Instagram and TikTok's defects, Plaintiff D.M. would have been aware of such disclosures and
27 would have stopped her minor child from using those products.
28

1 155. S.M.'s use of Instagram and, later, of TikTok, coincided with a decline in her mental
2 health, including harmful dependencies, anxiety, depression, social comparison harms, a life-
3 threatening eating disorder.

4 156. Prompted by the addictive design of the Instagram and TikTok products, and the
5 constant notifications that Meta and TikTok pushed to her 24 hours a day, S.M. developed
6 compulsion to engage with those products and began getting less sleep, engaging less with family
7 and friends, and otherwise losing interest in the world around her. When D.M. tried to exercise
8 parental authority and control by restricting S.M.'s access to Defendants' products, S.M. would
9 exhibit uncharacteristic behaviors such as extreme anger and loss of control. She felt like she needed
10 Instagram and TikTok to survive.

11 157. Unbeknownst to Plaintiffs, including S.M., Defendants Meta and TikTok's product
12 designs also were targeting S.M. with extreme body image, weight loss, and exercise content,
13 harmful and depressive content, drug advertisements, advocating self-harm, and other harmful
14 subject matters S.M. did not open Facebook, Instagram, or TikTok accounts to see and did not seek
15 out, but which Defendants themselves chose for S.M. in their effort to maximize engagement, and
16 resulting revenue.

17 158. S.M. was further exposed to harmful social comparison and social rewards tools and
18 features. For example, Meta's "like" button and its deliberate direction of excessive amounts of
19 health, beauty, and related content to minor users.

20 159. Neither S.M. nor her parents knew or had reason to know about Defendants'
21 defective and/or inherently dangerous products, features, and tools, and that they were using such
22 products, features, and tools in an exploitative and harmful manner.

23 160. As a result of Defendants' defective and/or inherently dangerous design, marketing,
24 distribution, and programming decisions, S.M. developed anorexia nervosa and has been
25 hospitalized more than two dozen times over the last seven years. Her parents have spent hundreds
26 of thousands of dollars in unreimbursed medical expenses and worry about their child's future and
27 ability to function and survive given the severity of the mental, emotional, and physical damages
28 these products have caused her.

1 161. For years, S.M.'s parents did not know if today the day would be they lost their child.
2 Every day became was day-to-day push to help S.M. stay alive, despite Defendants' best efforts to
3 the contrary.

4 **VI. TIMELINESS AND TOLLING OF STATUTES OF LIMITATIONS**

5 162. Through the exercise of reasonable diligence, Plaintiffs did not and could not have
6 discovered that Defendants' products caused their injuries and/or sequelae thereto because, at the
7 time of these injuries and/or sequelae thereto, the cause was unknown to Plaintiffs.

8 163. Plaintiffs did not suspect and had no reason to suspect Defendants' products caused
9 their injuries and/or sequelae thereto until less than the applicable limitations period prior to the
10 filing of this action.

11 164. Due to the highly technical nature of the platforms' features, Plaintiffs and were
12 unable to independently discovery that Defendants' products caused their injuries and/or sequelae
13 thereto until less than the applicable limitations period prior to the filing of this action.

14 165. Defendants had exclusive knowledge of the material defects designed and
15 implemented into their platforms, and they have at all times through the present maintained their
16 proprietary designs of their platforms' features as strictly confidential.

17 166. In addition, Defendants' fraudulent concealment and/or other tortious conduct tolled
18 the running of any statute of limitations.

19 167. Defendants had a duty to disclose dangerous and defective features that cause
20 foreseeable harm to children and teens.

21 168. Defendants knowingly, affirmatively, and actively concealed from Plaintiffs the risks
22 associated with the defects of Defendants' products and that these products caused their injuries
23 and/or sequelae thereto.

24 169. Defendants committed tortious and/or fraudulent acts that continue to this day. As of
25 the date of this Complaint, Defendants still have not disclosed, and continue to conceal, that they
26 designed and implemented dangerous features into their platforms. Despite their knowledge of the
27 defects and their attendant safety risks, Defendants continue to market their platforms to children
28 and teens while simultaneously omitting the disclosure of known and foreseeable harms to children

1 and teens. In contrast, Plaintiffs were unaware and could not have reasonably known or learned
2 through reasonable diligence that they had been exposed to the defects and risks alleged herein and
3 that those defects and risks were the direct and proximate result of Defendants' acts and omissions.

4 170. Plaintiffs were unaware and could not have reasonably known or learned through
5 reasonable diligence that the harms they suffered were directly and proximately caused by
6 Defendants' acts and omissions.

7 171. For the foregoing reasons, Defendants are estopped from relying on any statutes of
8 limitation or repose as a defense in this action and as to all claims against them. All applicable
9 statutes of limitation and repose have been tolled by operation of one of more of the following: the
10 discovery rule, Defendants' active and fraudulent concealment, equitable tolling, and/or the
11 continuing nature of harms Defendants' caused and continue causing to this day.

12 **VII. PLAINTIFFS' CLAIMS**

13 172. The entirety of this Complaint is pled upon information and belief and each allegation
14 contained herein is likely to have evidentiary support after a reasonable opportunity for further
15 investigation or discovery.

16 173. Plaintiffs plead all Causes of Action of this Complaint in the broadest sense, pursuant
17 to all laws that may apply under choice-of-law principles, including the law of the resident states of
18 Plaintiffs. To the extent applicable to specific Causes of Action, Plaintiffs plead these Causes of
19 Action under all applicable product liability acts, statutes, and laws of their respective States.

20 174. Plaintiffs hereby incorporate and adopt as though set forth in full herein, the
21 following causes of action and allegations from Section VI of the Master Complaint:

22 **COUNT 1:**
23 **STRICT LIABILITY – DESIGN DEFECT**
24 **(Against All Defendants)**

25 175. Plaintiffs reallege and incorporate by reference each preceding and succeeding
26 paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully
27 herein Paragraphs 825 through 850 of the Master Complaint.
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COUNT 2:
STRICT LIABILITY – FAILURE TO WARN
(Against All Defendants)

176. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully herein Paragraphs 852 through 868 of the Master Complaint.

COUNT 3:
NEGLIGENCE – DESIGN
(Against All Defendants)

177. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully herein Paragraphs 870 through 892 of the Master Complaint.

COUNT 4:
NEGLIGENCE – FAILURE TO WARN
(Against All Defendants)

178. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully herein Paragraphs 894 through 911 of the Master Complaint.

COUNT 5:
NEGLIGENCE
(Against All Defendants)

179. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully herein Paragraphs 913 through 938 of the Master Complaint.

COUNT 6:
NEGLIGENT UNDERTAKING
(Against All Defendants)

180. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully herein Paragraphs 940 through 955 of the Master Complaint.

COUNT 7:
FRAUDULENT CONCEALMENT AND MISREPRESENTATION

181. **Count 7 as against the Meta Defendants in connection with Instagram and/or Facebook.**

182. Plaintiffs K.K., individually and on behalf of S.K. and A.K., and D.M., individually and on behalf of S.M., reallege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein.

183. This claim is brought against Meta.

184. Plaintiffs hereby incorporate as though set forth fully herein Paragraphs 958 through 976 of the Master Complaint.

185. These minor Plaintiffs asked their parent or parents if they could open Instagram and/or Facebook accounts or opened those accounts without their parents' knowledge or consent, which accounts their parents then found out about. Prior to those children joining Instagram and/or Facebook and/or discovery of those accounts, their parents were generally familiar with those products and were unaware that youth usage of those products could lead to addiction and other mental and physical health harms.

186. Relying on the information Meta provided and put out into the public, Plaintiffs believed that Instagram and/or Facebook were safe and age-appropriate for the aforementioned minor Plaintiffs. These Plaintiffs did not see nor were they aware of any information about the defective features identified herein and in the Master Complaint. Nor did they see any information about the risks of addiction or resulting physical and mental health harms from usage of Instagram and/or Facebook. These omissions were material to their decision to allow their minor children to open an account on Instagram and/or Facebook.

187. Had Meta publicly or privately disclosed the risks of harm associated with its products' defects, these Plaintiffs would have been aware of such disclosures and would not have allowed their minor children to open an account or continue using an account once discovered; and likewise, the children themselves would have been aware of such disclosures and would not have opened an account.

1 188. **Count 7 as against the TikTok Defendants.**

2 189. Plaintiffs K.K., individually and on behalf of S.K. and A.K., and D.M., individually
3 and on behalf of S.M., reallege and incorporate by reference each preceding and succeeding
4 paragraph as though set forth fully at length herein.

5 190. This claim is brought against the TikTok Defendants.

6 191. The minor Plaintiffs at issue asked their parents if they could open accounts and/or
7 use these Defendants' social media products, or opened accounts without their parents' knowledge
8 or consent, which accounts their parents then found out about. Prior to such use, Plaintiffs generally
9 were familiar with those products and were unaware that youth usage of those products could lead
10 to addiction and other mental and physical health harms.

11 192. These minor Plaintiffs asked their parent or parents if they could open Instagram
12 and/or Facebook accounts and/or opened those accounts with their parents' knowledge or consent,
13 which accounts their parents then found out about. Prior to those children joining Instagram and/or
14 Facebook and/or discovery of those accounts, their parents were generally familiar with those
15 products and were unaware that youth usage of those products could lead to addiction and other
16 mental and physical health harms.

17 193. Relying on the information these Defendants provided and put out into the public,
18 Plaintiffs believed that these products were safe and age-appropriate for the aforementioned minor
19 Plaintiffs. These Plaintiffs did not see nor were they aware of any information about the defective
20 features identified herein and in the Master Complaint. Nor did they see any information about the
21 risks of addiction or resulting physical and mental health harms from usage of these products. These
22 omissions were material to their decision to allow their minor children to open such accounts.

23 194. Had these Defendants publicly or privately disclosed the risks of harm associated
24 with their products' defects, these Plaintiffs would have been aware of such disclosures and would
25 not have allowed their minor children to open an account or continue using an account once
26 discovered; and likewise, the children themselves would have been aware of such disclosures and
27 would not have opened an account.

28 195. As set forth in more detail above, these Defendants knew about the defective
condition of their products and that the products posed serious health risks to users.

1 196. These Defendants were under a duty to tell the public the truth and to disclose the
2 defective condition of their products and that the products posed serious health risks to users,
3 particularly youth.

4 197. These Defendants breached their duty to the public, users, and their parents,
5 including these Plaintiffs, by concealing, failing to disclose, and making misstatements about the
6 serious safety risks presented by their products. Even though Defendants knew of those risks based
7 on internal studies, external studies known to them, personal observation and reports, they
8 intentionally concealed those findings, in order not to lose users and advertising revenue, and to
9 induce youth, including Plaintiffs, to continue using their products.

10 198. TikTok made numerous partial material representations downplaying any potential
11 harm associated with their products and reassuring the public, Congress, and parents, including
12 Plaintiffs, that their products, were safe, including but not limited to, TikTok's advertising of its
13 product as being one designed for and safe for kids, and its many representations to consumers in
14 connection with the same, as well as specific advertising and public statements wherein TikTok
15 represented that TikTok's For You feed technology identifies and shows users what they want to
16 see when, in fact, TikTok knew at all times relevant that it had designed and was programming
17 TikTok's For You feed technology on the basis of what would increase its own engagement,
18 including identification and targeting of content in which users expressed no interest whatsoever.
19 Representations dating back to 2019, if not sooner, that TikTok was taking reasonable steps to
20 protect minor users and create age-appropriate experiences for them.¹⁴

21 199. Plaintiffs hereby incorporate as though set forth fully herein, but as applied to the
22 Snap, Google, and TikTok Defendants, Paragraphs 962 through 976 of the Master Complaint.
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25 ¹⁴ See, for example only, TikTok testimony on October 26, 2021 that reiterates these false and/or materially
26 misleading statements: Senate Subcommittee on Consumer Protection, Product Safety, and Data Security hearing,
27 Oct. 26, 2021, available at <https://www.c-span.org/video/?515533-1/snapchat-tiktok-youtube-executives-testify-kids-online-safety&live> (starting at 27:46); see also, e.g., Written Testimony of Michael Beckerman, Vice President and
28 Head of Public Policy, Americas, TikTok, Hearing before the United States Senate Committee on Science,
Commerce, and Transportation, Subcommittee on Consumer Protection, Product Safety, and Data Security, Oct. 26,
2021, available at <https://www.commerce.senate.gov/services/files/8C751FF4-A1FD-4FCA-80F6-C84BEB04C2F9>,
at 2; TikTok Community Guidelines, last updated Feb. 2022, <https://www.tiktok.com/community-guidelines?lang=en>;
Guardian's Guide, <https://www.tiktok.com/safety/en/guardians-guide/>.

COUNT 8:
NEGLIGENT CONCEALMENT AND MISREPRESENTATION
(Against the Meta, Snapchat, YouTube, and TikTok Defendants)

200. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein.

201. This claim is brought against Meta.

202. Plaintiffs hereby incorporate as though set forth fully herein, and as applied to Meta's Facebook and Instagram products, as well as Defendants Snap, Google, and ByteDance's Snapchat, YouTube, and TikTok products, Paragraphs 979 through 992 of the Master Complaint.

COUNT: 9
NEGLIGENCE PER SE
(Against Meta, Snap, and TikTok)

203. Plaintiffs P.F., individually and on behalf of A.F. (as against Defendant Meta only), N.L., individually and on behalf of L.L. (as against Defendants Meta, Snap, TikTok, and Google), K.K., individually and on behalf of S.K. and A.K. (as against Defendants Meta and TikTok), Keanna Glenn-Mills (as against Defendants Meta, Snap, TikTok, and Google), Karen Glenn and K.G.M. (as against Defendants Meta, Snap, and TikTok), and D.M., individually and on behalf of S.M. (as against Defendants Meta and TikTok), re-allege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully herein Paragraphs 994 through 1013 of the Master Complaint.

COUNT 10:
SEX AND AGE DISCRIMINATION
(Against All Defendants)

204. Plaintiffs reallege and incorporate by references each preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully herein Paragraphs 1015 through 1023 of the Master Complaint.

V. DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial on all issues so triable.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against each of the Defendants, jointly and severally, and as appropriate to each cause of action alleged and the standing of Plaintiffs as

follows:

1. Past, present and future general damages, the exact amount of which has yet to be ascertained, in an amount which will conform to proof at time of trial, to compensate Plaintiffs for injuries sustained as a result of the use of each Defendant's respective social media products including, but not limited to physical pain and suffering, mental anguish, loss of enjoyment of life, emotional distress, expenses for hospitalizations and medical treatments;
2. Past, present and future economic and special damages according to proof at the time of trial;
3. Loss of earnings and impaired earning capacity according to proof at the time of trial;
4. Medical expenses, past and future, according to proof at the time of trial;
5. Funeral expenses and other special damages according to proof at the time of trial;
6. Punitive or exemplary damages according to proof at the time of trial;
7. All damages available for wrongful death and survival;
8. Exemplary and punitive damages in an amount in excess of the jurisdictional limits;
9. Attorneys' fees;
10. For costs of suit incurred herein;
11. Pre-judgment and post-judgment interest as provided by law;
12. For such other and further relief as the Court may deem just and proper.

Dated: July 25, 2023.

SOCIAL MEDIA VICTIMS LAW CENTER

By: 

Laura M. Lottes, SBN 221542

laura@socialmediavictims.org

Sydney Lottes, SBN 345387

sydney@socialmediavictims.org

Matthew P. Bergman (*pro hac vice anticipated*)

matt@socialmediavictims.org

Glenn S. Draper (*pro hac vice anticipated*)

glen@socialmediavictims.org

SOCIAL MEDIA VICTIMS LAW CENTER

520 Pike Street, Suite 1125

Seattle, WA 98101

T: (206) 741-4862

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SEEGER WEISS LLP
Christopher A. Seeger
cseeger@seegerweiss.com
Christopher Ayers
cayers@seegerweiss.com
Jennifer Scullion
jscullion@seegerweiss.com
55 Challenger Road
Ridgefield Park, NJ 07660
Ph: 973-639-9100
Facsimile: 973-679-8656

Robert H. Klonoff
klonoff@usa.net
2425 S.W. 76th Avenue
Portland, OR 97225
Ph: (503) 702-0218

Attorneys for Plaintiffs