

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

IN RE

INVESTIGATION OF TIKTOK, INC.

Case No. 23-0298-I

DAVIDSON COUNTY CHANCERY COURT
CLERK & MASTER

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FILED

**BRIEF OF AMICI CURIAE THE COLORADO DEPARTMENT OF
LAW AND 21 OTHER STATES IN COMMON INTEREST**

The amici States¹ of Alabama, Arizona, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii², Idaho, Maine, Maryland, Michigan, Minnesota, North Dakota, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Dakota, Virginia, Wisconsin, and Wyoming submit this brief in support of the Motion Requesting Remedies to Address Spoliation and Compel Compliance with Agreed Order 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 rel. Com'r of Transp. v. Med. Bird Black Bear White Eagle*, 63 S.W.3d 734, 758-59 (Tenn. Ct. App. 2001).

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. However, signing onto this brief does not confirm any particular state's participation in the multistate investigation into TikTok. Though for the sake of simplicity, amici States are referenced as a single group throughout this brief.

² Hawaii is represented on this matter by both its Department of the Attorney General and Office of Consumer Protection, the latter of which is a separate agency that is statutorily co-authorized to undertake consumer protection functions, including legal representation of the State of Hawaii. For simplicity purposes, this brief sometimes refers to the "attorneys general" or individually to an "Attorney General" and the designations, as they pertain to Hawaii, refer to both the Attorney General of the State of Hawaii's Department of the Attorney General and the Executive Director of the State of Hawaii's Office of Consumer Protection.

I. INTEREST OF AMICI CURIAE

Tennessee's Motion Requesting Remedies to Address Spoliation and Compel

Compliance with Agreed Order 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.

All attorneys general have obligations to protect their citizens from unfair, abusive, and deceptive acts. They use their state consumer protection laws to investigate and enforce the protections provided to consumers by state legislatures. 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. To minimize duplication and maximize efficiency, these coordinated efforts rely on a limited number of states issuing subpoenas to seek documents that all states review collectively to determine if and to what extent consumer protection statutes are violated and what remedy is necessary to pursue to protect states' citizens. By sharing information, time, and money, these multistate investigations allow the States to protect consumers most effectively and to pursue important claims against well-resourced companies that might otherwise escape enforcement.

A multistate investigation was formed to investigate TikTok in 2022 and the bipartisan group of States involved has invested substantial resources into the TikTok investigation. Several States in the multistate investigation issued subpoenas, including Tennessee, which issued to TikTok a Request for Information (RFI) under Tenn. Code Ann. § 47-18-106(a).³ As is common

³ States issued demands under their own state statute authorizing pre-filing information collection for the state's enforcement of its consumer protection laws.

in multistate investigations, TikTok has agreed that Tennessee may share the documents it produces in response to Tennessee's RFI with other States in the multistate investigation. Thus, Tennessee's issuance and subsequent enforcement of its RFI has a material impact on all States involved in this multistate investigation of TikTok.

TikTok's failure to preserve potentially relevant evidence and to produce information in a reasonably useable format is impeding the investigation of both Tennessee and States across the country who continue investigating TikTok. 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.

Tennessee and other States are authorized to petition the judiciary to enforce the terms of their respective investigatory subpoenas,⁴ and penalties may be warranted if a subject conceals, destroys, or otherwise withholds subpoenaed information. Thus, a decision from this Court on Tennessee's motion may impact these States' enforcement of their own requests and the multistate investigation more broadly, as well as shape the ability of all involved States to enforce their own subpoenas.

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. TikTok has repeatedly failed to respond to Tennessee's RFI, including about the spoliation of evidence relevant to its consumer protection claims, and to comply with this Court's multiple orders requiring it to produce responsive documents and witnesses. As detailed in Tennessee's motion, TikTok has nearly categorically refused to comply with Tennessee's reasonable requests

⁴ See, e.g., Colo. Rev. Stat. § 6-1-109(1); 15 O.S. § 760; Va. Code 59.1-9.10.

for information. The States draw this Court's attention to our previously filed *Amici Curiae* brief detailing the scope of the States' interest and the impact of this Court's decision on its coordinated efforts.⁵ For the sake of judicial economy, the States do not reiterate the arguments made in that brief, but rather highlight additional implications of Tennessee's current motion.

The States support Tennessee's motion to compel, which, in addition to the spoliation and chat readability issues addressed in Tennessee's earlier enforcement actions, raises additional deficiencies with TikTok's productions. These deficiencies include improper redactions based on the Stored Communications Act and attorney client privilege, refusal to produce text message communications by TikTok's executives as well as Trust & Safety Communications personnel, failure to produce transcripts from examinations of its employees, experts, and agents taken in litigation pending before federal and state courts, and refusal to timely produce documents relevant to the States' investigation.

All this information, withheld by TikTok, is necessary to understanding the extent of TikTok's unlawful conduct, including responsible persons and related entities, so that the States can work to stop the conduct either by resolving it directly with TikTok or through litigation.

III. STATEMENT OF FACTS

On March 2, 2022, Tennessee served TikTok with a RFI which requested information related to alleged harms caused by TikTok's platform and contained a Notice of Preservation informing TikTok of its obligation to preserve information relevant to the investigation. TN RFI at 2. As detailed in Tennessee's motion, TikTok has repeatedly failed to fully answer and comply with Tennessee's RFI. Tennessee has been forced to file multiple motions, including this one,

⁵ However, many of the states who previously joined the 2023 *Amicus Curiae* have subsequently filed lawsuits against TikTok and have not been asked to join this brief.

with the Court to ensure TikTok's compliance with the law. Given the States' significant interest in coordinating and working together in this multistate investigation and stopping unlawful conduct harming its citizens, they so sought, and were granted leave to file an *Amici Curiae* brief in support of Tennessee (*Amici Curiae*) in March 2023. On April 17, 2023, the Court entered the Agreed Order requiring TikTok comply with Tennessee's RFI. When TikTok failed to follow the Court's order, Tennessee filed a motion to compel TikTok's compliance. After reviewing the deposition transcript of TikTok's witness, the Court granted Tennessee's motion, and, on February 5, 2024, it entered an Order on Motion Compel Compliance with Agreed Order on Motion to Compel Compliance with Request for Information. The States have worked alongside Tennessee and conferred in good faith with TikTok to work through TikTok's multiple failures to comply with Tennessee's RFI and this Court's orders. All relevant facts regarding the efforts by the multistate to obtain this information can be found in Tennessee's motion.

IV. ARGUMENT

A. **TikTok's continued non-compliance materially impacts the multistate investigation into TikTok's unfair, abusive, and deceptive acts.**

TikTok is interfering with the multistate investigation by purposefully concealing from the States the full extent of its conduct impacting our nation's youth, including information related to TikTok's spoliation of evidence, and evading the requirements of past court orders and the clear requirements of Tennessee's Consumer Protection Act. As detailed in Tennessee's motion, TikTok has engaged in a series of intentional practices to systematically avoid its well-established obligations to maintain relevant information and produce it to Tennessee and by extension, the multistate. Its chat deletion, lack of document retention, and failure to comply with requisite litigation holds, among other things, is preventing the States from obtaining the information they are entitled to about TikTok's conduct. TikTok's obfuscation prevents the

States from fulfilling their duties to understand whether, and to what extent, TikTok engaged in unfair, abusive, and deceptive acts that have harmed their citizens.

Companies' failure to preserve information, including chats, in the face of government investigations has become a pervasive problem. The practice of deleting chats even after the duty to preserve relevant information arises—as well as the destruction of relevant documents including communications between witnesses—is an issue increasingly requiring redress by courts. Numerous courts have recently found that companies failed to comply with legal preservation obligations to preserve “chats” like those at issue here. *See, e.g., United States, et al. v. Google LLC*, No. 20-cv-03010-APM (D.D.C. Aug. 5, 2024), at ECF No. 1033 p. 276 (“Any company that puts the onus on its employees to identify and preserve relevant evidence does so at its own peril.”); *FTC v. Amazon.com, Inc.*, No. 23-cv-01495 (W.D. Wash. July 9, 2024), at ECF No. 264 (court ordering 30(b)(6) deposition to determine extent of potential spoliation related to the defendant’s document retention and use of ephemeral messaging applications.); *In re Google Play Store Antitrust Litig.*, 664 F. Supp. 3d 981 (N.D. Cal. Mar. 28, 2023) (sanctioning defendant for failing to preserve relevant communications by not actively eliminating the ephemerality feature associated with Google Chats that allows those messages to be permanently deleted after 24 hours); *Pable v. Chicago Transit Auth.*, No. 19-cv-7868, 2023 WL 2333414, at *2 (N.D. Ill. Mar. 2, 2023), *report and recommendation adopted*, No. 19-cv-7868, 2024 WL 3688708, at *9 (N.D. Ill. Aug. 7, 2024) (holding dismissal is the appropriate sanction because plaintiff’s “evasive tactics and dishonesty,” intended to deprive the defendant of relevant ESI, and “[a] lesser sanction would not be sufficient to cure the prejudice suffered” due to the spoliation because it is “impossible to determine the full extent of the spoliation”). This practice has also resulted in the Federal Trade Commission’s Bureau of Competition and the Department

of Justice Antitrust Division issuing guidance addressing chat preservation within the context of antitrust investigations. It emphasized that “[w]here companies fail to preserve documents—regardless of what tools are used to create those documents—they may be breaking the law and subject to sanctions.”⁶

Tennessee’s RFI served pursuant to its consumer protection investigation imposed obligations on TikTok to preserve relevant communications made on messaging platforms, and specifically included “instant messages,” “chat logs,” and “Enterprise communication tools (such as, but not limited to, Lark).” TN 2.5.22 RFI at 3. But TikTok ignored these obligations through its continued destruction of chats despite obligations to preserve them. The “Lark” application system – a communication platform designed and owned by its parent company, ByteDance – is the primary method by which TikTok employees communicate internally about substantive business topics related to the platform and its features, including matters related to the States’ consumer protection investigation. Tennessee requested the information related to the Lark chats because the chats provide a critical window into the candid thought processes, intentions, and observations of those responsible for designing, managing, and operating the features on TikTok’s platform, which cause the mental health harm to our children and teens that are the focus of this investigation.

⁶ See Slack, Google Chats, and other Collaborative Messaging Platforms Have Always Been and Will Continue to be Subject to Document Requests, FTC Jan. 26, 2024, <https://www.ftc.gov/enforcement/competition-matters/2024/01/slack-google-chats-other-collaborative-messaging-platforms-have-always-been-will-continue-be-subject>. In a January 26, 2024, joint statement, the agencies reiterated document preservation obligations for companies and individuals that are the subject of government investigations and litigations, emphasizing messaging platforms, such as Slack and Google Chats, that automatically delete communications.

The Lark chat functionality is the primary communication tool used daily by employees. As opposed to the more formal approach and tone used over email, the chat function facilitates more free and candid communications reflecting observations or opinions including those relating to the core issues in this case. The Lark platform includes several features which enable employees to destroy chat messages (“Recall”) and engage in secret conversations which the system automatically deletes (“Secure Chat”). Yet, after receiving Tennessee’s RFI, TikTok continued to allow staff to utilize the Recall and Secure Chat features in Lark, which resulted in the deletion of chat messages. Additionally, as detailed in Tennessee’s enforcement motion, TikTok also deleted files containing the metadata (“Container File”) that is created when a user sends a Secure Chat to multiple recipients (a “Group Secure Chat”). Container Files include metadata identifying, among other things: the user who initiated the Group Secure Chat thread, when the thread was created, the name of the group, and which users have access to the thread. The individual Secure Chat messages exchanged within a Group Secure Chat thread are automatically deleted by the Lark platform at the designated expiration time, but historically the associated Container File persisted indefinitely. However, nine (9) months after the RFI was served an automated process was implemented to delete Container Files associated with inactive Group Secure Chat threads thus depriving the States of even the metadata which would have otherwise provided relevant information about potential witnesses, timelines, and other critical evidence.

TikTok failed to preserve chats containing contemporaneous thoughts of the people with the most insight into TikTok’s design and algorithmic decisions, which bear directly on whether TikTok’s public statements about these design and algorithmic decisions were accurate and complete. The loss of these chat communications prejudiced the States by depriving them of information that was not only relevant, but uniquely so because of the candor between chat

participants.

Access to the spoliated chats and related information would have allowed the States to review critical evidence and identify witnesses with information highly relevant to the States' consumer protection claims. TikTok knew its preservation obligations arose when it received subpoenas from Tennessee and other States as reinforced by this Court's subsequent orders. As a sophisticated multinational corporation, it certainly understood the steps it needed to take to preserve evidence yet it overtly failed to do it. And, it continues to refuse to comply with the RFI and with multiple orders from the Court. Absent proper redress in cases such as the one before this Court, companies will increasingly be emboldened to destroy relevant evidence with impunity which will materially hinder States' ability to protect their citizens.

B. The entire multistate coalition will benefit from the relief ordered by the Court.

Tennessee requests that the Court order TikTok to produce additional discovery requested by Tennessee's RFI that could help the States better understand what information was lost in TikTok's chat deletion. Additionally, Tennessee has asked the Court to find that TikTok engaged in spoliation and to impose a monetary penalty. This finding is significant because it could support a future adverse inference that the Lark chats contained relevant information unfavorable to TikTok. Such adverse inference is important in any State litigation action. TikTok did not take reasonable steps to preserve the Lark chats that should have been preserved. The record demonstrates that the deleted chat evidence cannot be replaced or restored. TikTok's conduct during the investigation shows that TikTok intended to subvert the multistate investigation and that evidence related to Lark chats was purposely lost with the intent to prevent its production to the States. Additionally, its failure to comply with the Court's orders to produce documents and knowledgeable witnesses further demonstrates both willfulness and bad faith.

Relevant, substantive communications were made on Lark that the States will never see, to the detriment of their investigations and any further necessary action. The relief sought by Tennessee would appropriately hold TikTok accountable for its willful and unlawful conduct.

V. CONCLUSION

For years, TikTok has disregarded its obligations to respond to Tennessee's lawful subpoena and this Court's orders. The Court should grant Tennessee's motion and compel compliance with Tennessee's Requests for Information.

Dated: October 8, 2024

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MOTION FOR LEAVE FOR BRIEF OF AMICI CURIAE THE
COLORADO DEPARTMENT OF LAW AND 21 OTHER STATES IN
COMMON INTEREST

The Colorado Department of Law and 21 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 Requesting Remedies to Address Spoliation and Compel Compliance with Agreed Order.

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 state attorneys generals believe that a company is violating their consumer protection laws, they will often form a multistate investigation. These multistate investigations enable 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 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 States² 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. As set forth fully in the brief the information sought by Tennessee is crucial to the States' understanding of TikTok's deceptive, unfair, and unconscionable conduct and States' decisions on how to best protect its citizens.

6. This Court's ruling has significant ramifications reaching beyond the present enforcement dispute at issue in Tennessee. The States' Amici Brief describes the implications of this Court's ruling for the multistate investigation.

¹ To reduce administrative burden and facilitate productive discussions with TikTok, states (including Tennessee) issued requests for information from TikTok, on behalf of themselves, and for the other investigating states with whom they shared the information. The entire multistate coalition has 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 All States participate in multistate investigations at one time or another and have an interest in ensuring companies respond to their requests for information. However, signing onto this brief does not confirm any particular state's participation in the multistate investigation into TikTok. Though for the sake of simplicity, States are referenced as a single group throughout this brief.

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