



ATTORNEY GENERAL OF MISSOURI
CATHERINE L. HANAWAY

IN THE MATTER OF:

CID No. 26-212

TikTok, Inc.

October 14, 2026

CIVIL INVESTIGATIVE DEMAND

TO: TikTok, Inc.

Serve: Corporation Service Company
1201 Hays Street
Tallahassee, FL 32301

The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether TikTok, Inc. or its affiliated chapters, agents, or employees have engaged in or are engaging in any practices declared to be unlawful by § 407.020, RSMo. This investigation will inquire into, among other things, the activities and representations of TikTok, Inc. in connection with providing and promoting the use of its social-media platform to young users. The Attorney General has reason to believe that TikTok, Inc. may have used deception, fraud, false promises, misrepresentation, unfair practices, and/or the concealment, suppression, or omission of material facts within the scope of the Missouri Merchandising Practices Act. The Attorney General's investigation is based in part on, but is not limited to, public statements and web materials posted by TikTok, Inc.

The Attorney General believes that you have information, documentary material, and/or physical evidence relevant to the investigation described above. Prompt compliance with this Civil Investigative Demand is mandatory. *See* § 407.080, RSMo. ("A person upon whom a civil investigative demand is served pursuant to the provisions of section 407.040 shall comply with the terms thereof unless otherwise provided by an order of a court.").

INSTRUCTIONS

1. Unless specifically stated otherwise, please restrict Your search for all information and documents requested below to only the period between January 1, 2021, to the present date.
2. For all of Your responses, You must identify—by Bates range, or by file names and locations—the Documents responsive to each particular request.

3. Produce all Documents in accordance with and as they are kept in the usual course of business, keeping all document families together and in accordance with Instruction 4 below.
4. For each Document that You produce, produce the current version along with all earlier editions, versions, or predecessor documents during the relevant time period, even though the title of earlier documents may differ from current versions.
5. Produce all Documents electronically, unless otherwise specified or agreed to by the Attorney General's Office.
6. For each Document produced or answer provided, Identify by number which request or requests the Document or answer responds to.
7. For requests seeking written answers, provide the answer in **boldface** in a paragraph or paragraphs directly beneath the numerical request.
8. If You have knowledge of a responsive Document or responsive information, but do not have the responsive Document or information in Your possession, custody, or control, identify the Person that You believe has that document or information in their possession, custody, or control.
9. If You do not know the answer to a request, Identify the Person that You believe does have that responsive information.
10. Your answers to requests for information must be signed under oath by the Person providing the responsive information. This might entail separate Persons verifying responses to different requests.
11. Provide all material as quickly as possible, which may mean providing responsive material in batches.
12. If You believe that You have responsive materials that are privileged, You must produce a privilege log that identifies each Document or Communication, the basis for withholding it, and sufficient information to permit the Attorney General's Office to assess whether it is privileged.
13. If You obtain documents responsive to any Request after You have submitted your production, You should supplement Your production with any new or different documents that become available to You.
14. If You learn of additional or updated information responsive to any Request after You submitted written answers, You should supplement Your answer to reflect the new information as it becomes available to You.

15. The Missouri Attorney General may serve additional or follow-up civil investigative demands on You.
16. Please note that under § 407.080, RSMo, certain acts done with the intent to avoid, evade, or prevent compliance in whole or in part with any civil investigative demand constitute a Class A misdemeanor, which is punishable by fines or imprisonment or both.
17. No extension of the deadline for compliance with this Civil Investigative Demand is effective unless it is reflected in writing by an authorized representative of the Missouri Attorney General.
18. You are advised that the Attorney General will not grant an extension of time or modification of the terms of the Demand except for good cause pursuant to the terms of § 407.070, RSMo. Your prompt response and provision of the requested information is requested.
19. As authorized by § 407.040, RSMo, the Attorney General demands that—no later than 10:00 a.m. CDT on November 13, 2026—You produce responsive documents and information to the Missouri Attorney General’s Office. Submit the Certification of Compliance, all Documents, and all responsive information, to:

Louis J. Capozzi III
Solicitor General
Missouri Attorney General’s Office
815 Olive Street, Ste. 200
St. Louis, MO 63101
Louis.Capozzi@ago.mo.gov
(573) 645-9662

DEFINITIONS

As used in this Civil Investigative Demand, the following definitions apply:

1. “You” and “Your” means the TIKTOK, INC., and all D/B/As, agents, representatives, employees, independent contractors, attorneys, and any other persons acting or purporting to act on behalf of TIKTOK, INC.
2. “And” and “or” are to be construed broadly to include both the disjunctive and conjunctive, to be equivalent to “and/or,” to render these Requests as broad as possible.
3. “ByteDance” refers to ByteDance Ltd. and any D/B/As, affiliated entities, predecessor entities, successor entities, and entities owned or controlled directly or indirectly by ByteDance Ltd.

4. “Child” or “Children” means a Person or persons that You know or have reason to know is/are under 13 years of age.
5. “Communication” means any expression, statement, conveyance, or dissemination of any words, thoughts, statements, ideas, or information, regardless of form, format, or kind. “Communication” includes but is not limited to oral or written communications of any kind, such as telephone conversations, discussions, meetings, notes, letters, agreements, emails or other electronic communications, text messages, facsimiles, and other forms of written or oral exchange that are recorded in any way, including video recordings, audio recordings, written notes, or otherwise. Any Communication that also falls within the definition of “Document” constitutes both a Document and a Communication for purposes of this Civil Investigative Demand.
6. “Document” includes every “writing,” “recording,” and “photograph” as Federal Rule of Evidence 1001 defines those terms, as well as any “duplicate” of any writing, recording, or photograph. “Document” includes, but is not limited to, electronic documents, files, databases and records, including but not limited to emails, voicemails, text messages, calendar appointments, instant messages, MMS messages, SMS messages, iMessages, computer files, spreadsheets, and metadata. The term Document includes every draft of any other material that falls within the definition of Document.
7. “Identify,” when used with respect to a person or entity, means to provide information sufficient to allow the Attorney General to ascertain the current contact information (name, home or business address, telephone number, and email), and, if not a natural person, the current contact information for Your point of contact with the entity or facility identified, as well as the relationship of that person or entity to You.
8. “Identify,” when used with respect to a fact or event, means to provide information sufficient to allow employees of the Attorney General to ascertain the fact or event with reasonable particularity, and to identify each person believed to have knowledge with respect to the fact or event and each document that refers or relates to the fact or event.
9. “Identify,” when used with respect to a transaction, means to provide information sufficient to allow ascertainment of the banking and financial information of the sending and receiving parties, the method of payment or funds transfer, and the natural persons involved with the transfer or payment.
10. “Identify,” when used with respect to a Communication, means to state with specificity the date of the Communication; the medium of communication; the location of the Communication; the names and aliases of the persons who made the Communication; and the names and aliases of all persons who were present when the statement was made, who received the Communication, who heard the Communication, or who came to know of the content of the Communication at a later time.
11. “Minor” or “Minors” means a Person or Persons that You know or have reason to know is under 18 years of age and includes Children.

12. “Person” means any natural person, including a Minor; Young Adult; corporation; proprietorship; partnership; association; firm; or entity of any kind.
13. “Product” means the online or mobile features, platforms, or services referred to as TikTok and TikTok for Younger Users, including all related features or functions.
14. “Relating to,” “Related to,” and “Relate to” mean to be relevant in any way to the subject matter, including, without limitation, all information that directly or indirectly contains, records, reflects, summarizes, evaluates, refers to, is pertinent to, indicates, comments upon, or discusses the subject matter; or that states the background of, or was the basis for, or that records, evaluates, comments, was referred to, relied upon, utilized, generated, transmitted, or received in arriving at any conclusion, opinion, estimate, position, decision, belief, policy, practice, course of business, course of conduct, procedure, or assertion concerning the subject matter.
15. “Relevant Period” refers to January 1, 2021, to the present date except where otherwise indicated.
16. “User” means a Person that has one or more account(s) with Your Product.
17. “You,” “Your,” or “TikTok” refers to TikTok, Inc. and any D/B/As, affiliated entities, predecessor entities, successor entities, entities owned or controlled directly or indirectly by You. “You” and “Your” also encompasses agents and all other business entities acting, or purporting to act, on Your behalf.
18. “Young User” refers to a User that is either a Child, Minor, or Young Adult.
19. “Young Adult” means a Person that You know or have reason to know is 18 years of age or older but under 24 years of age.

REQUESTS FOR INFORMATION AND DOCUMENTS

1. Identify all Persons responsible for providing Documents and information responsive to this Civil Investigative Demand. For each Person identified, Identify the specific requests to which each Person contributed Documents or information.
2. Produce all Documents that You identified, referred to, used to prepare, or that concern any of Your responses to any of these specific requests, to the extent that such Documents are not otherwise produced by any request contained herein directed to You.
3. If Documents or information responsive to a particular request have been lost or destroyed, state the circumstances under which the Documents or information were lost or destroyed, describe the lost or destroyed Documents or information to the fullest extent possible, state the specific demand to which they are responsive, and identify all Persons having knowledge of their content.

4. Produce Documents—including organizational charts—sufficient to Identify Your corporate structure, stating the names of all parents, subsidiaries, divisions, affiliates, branches, joint ventures, franchises, operations under assumed names, websites, and entities over which You exercise supervision or control. For each such entity, describe the nature of its relationship to You and the date it was created, acquired, sold, or otherwise changed ownership or control.
5. Produce Documents that show, for each month of the Relevant Period, the number and state of residence for (1) all Users, (2) Child Users, (3) Minor Users, and (4) Young Adult Users, and the number of Child Users, Minor Users and Young Adult Users that engage with Your Product at least once a month and at least once a day.
6. Produce Documents constituting or sufficient to Identify all processes, policies, methods, procedures, training, technologies, and parameters for identifying the ages of Users of the Product, including whether a User or prospective User is a Child, is over 13 years of age but under 18 years of age, or is a Young Adult.
7. Produce Documents including policies, practices, steps and procedures in place, including the effective date, addressing Child Users', Minor Users', and Young Adult Users' usage of TikTok; parental controls; permissible age to create an account; verification of users' ages; limits on content; privacy practices in place for Child Users, Minor Users, and Young Adult Users; and content review.
8. Produce Documents constituting or Relating to investigations, reports, analyses, or presentations Relating to the number of Child Users.
9. Produce Documents—including reports, acknowledgements, complaints, and other information—required by sections V, VI, VII, IX, and VIII of the consent decree entered with the U.S. Federal Trade Commission on or about February 27, 2019.¹
10. Produce Communications and Documents, including without limitation business plans, slide decks, presentations, memoranda, or similar Documents, Relating to Your efforts to increase or retain the number of Young Users and engagement or interaction with, or use of, Your Product by Young Users, including without limitation any such Communications and Documents provided to or received from ByteDance.
11. Produce Documents showing, on a monthly basis over the Relevant Period, engagement with Your Product by Young Users, as shown by any metrics You use to measure such engagement, including for example and without limitation, video views, time spent, viewing time, profile views, likes, comments, shares, replays, account creation, account follows, sounds, responses, content created, hashtags, retention, or advertisement click-through-rates.

¹ <https://www.ftc.gov/news-events/press-releases/2019/02/video-social-networking-app-musically-agrees-settle-ftc>.

12. Produce Documents sufficient to Identify the data elements, attributes, or User interactions used or interpreted by Your recommendation system(s), including but not limited to the “For You” feed, to curate content for Young Users, including without limitation, those listed within the Document titled “TikTok Algo 101” that was first reported upon by the New York Times on December 5, 2021.² This request includes Documents sufficient to explain or specify how each of the data elements, attributes, or User interactions used or interpreted by the recommendation system(s) for Your Product—including but not limited to, the “For You” feed—are weighted.
13. Produce Documents that Identify all Persons, teams, groups, or divisions—including without limitation, product architects, team leaders, product managers, and project managers responsible for maintaining or increasing the number or activity of Young Users on Your Product and all Communications during the Relevant Period by, to, or between those Persons, teams, groups, or divisions regarding efforts to maintain or increase the number or activity of Young Users on Your Product.
14. Produce Documents constituting or reflecting employee payment or salary schedules or structures, bonus or other incentive payments, or promotions Relating to an employee’s efforts to maintain or increase the number and activity of Young Users on Your Product.
15. Produce Documents Relating to Your development and testing of techniques, strategies, or features designed to increase the use of Your Products by Young Users, including without limitation, efforts to diversify the content curated for Users by Your recommendation system. This request includes but is not limited to Documents reflecting the design, methodology, running of, and results of all testing (including without limitation, diary studies, A/B or multivariate testing, or experiments) of Your Products and any Product features concerning Young Users and expenditures for such testing.
16. Produce Documents sufficient to Identify all Persons, teams, groups, or divisions, including without limitation, product architects, team leaders, product managers, and project managers that during the Relevant Period were involved in designing, running, testing, or interpreting tests of the Product or Product features Relating to Young Users.
17. Produce Documents sufficient to describe Your business plans or projections Relating to identifying, encouraging, compensating, or otherwise assisting Young Users to create videos, sounds, or other content on Your Product.
18. Produce Documents sufficient to Identify the top 100 Young Users in the Creator Fund You announced in the summer of 2020³ and the Creator Rewards Program, the ages of each such Young User at all times while being considered for or included within the Creator Fund or Creator Rewards Program, and the amount of money or other intangible value

² Smith, B., *How TikTok Reads Your Mind*, N.Y. TIMES, Dec. 5, 2021, <https://www.nytimes.com/2021/12/05/business/medialtiktok-algorithm.html>.

³ See <https://newsroom.tiktok.com/en-us/introducing-tbe-200-million-tiktok-creator-fund>.

(e.g., rewards, coins, credits, etc.) You exchanged with each of those Young Users during the Relevant Period.

19. Produce Documents sufficient to Identify the 100 hashtags each year during the Relevant Period that generated the highest engagement among Young Users and that Identify all metrics that reflect or measure such engagement.
20. With regard to “Challenges” targeted to, created by, available to view, or viewed by Young Users, produce Documents sufficient to show Your efforts to create, promote, amplify, increase engagement with, or suppress videos or hashtags associated with such “Challenges,” including without limitation, challenges dubbed “National Shoot Up Your School Day,” “Devious Licks,” the “Bathroom challenge,” “Milk Crate challenge,” “Skullbreaker,” “Penny challenge” or “Outlet challenge,” the “Hot Water challenge,” the “Benadryl challenge,” the “Nutmeg challenge,” the “Cha-cha-cha challenge,” the “Blackout challenge,” the “Kool-Aid Man challenge,” the “Slap a Teacher challenge,” the “Orbeez challenge,” the “Kia challenge,” the “One Chip challenge,” the “Angel of Death challenge,” the “Boat Jumping challenge,” the “Chroming challenge” or “Dusting challenge,” the “Borax challenge,” the “24-Hour Fort challenge,” the “Door Kick challenge” or “Kick Door challenge,” the “Chromebook challenge,” or “Scientology Speedrunning.”
21. Produce Documents and Communications Relating to the creation of fake accounts whether by You or others, including without limitation, Documents Relating to the use of “Shadow Accounts.”
22. Produce Documents and Communications Relating to inauthentic or fake engagement (including without limitation through likes, reshares, etc.) with content, whether by You or others.
23. Produce Documents constituting or sufficient to reflect policies and procedures, training, and parameters Relating to content creation, content promotion, curation, content diversification, and content suppression on Your Product.
24. Produce Documents that Identify the three current employees and three former employees most knowledgeable about processes, policies, methods, procedures, training, technologies, and parameters for content creation, content promotion, curation, content diversification, and content suppression for Your Product during the Relevant Period.
25. Produce Documents constituting or Relating to studies, testing, research, risk analysis, or investigations into the prevalence of problematic use of Your Products, Your Products’ impact on self-harm or suicidal ideation by Young Users, or other mental or physical health impacts or effects Relating to the use of Your Products by Young Users, including all draft, annotated, and final reports, research papers, analyses, white papers, slide decks, presentations, synopses, blog posts, talking points, or memoranda reflecting the results of such testing, studies, risk analysis, or investigations.

26. Produce Documents that Identify, and Communications by, to, or between, all Persons that designed, conducted, researched, studied, advised, analyzed, received, commented on, or authored the tests, studies, research, risk analyses, or investigations identified in Request 24.
27. Produce Documents and Communications Relating to or reflecting the basis and purposes for the changes to the recommendation system that You announced on December 16, 2021.⁴
28. Produce Documents Relating to interventions or Product changes discussed or implemented in response to indicators or concerns of mental or physical harm that may result from Young Users' use of Your Product, including the issues identified in the Documents responsive to Requests 24 and 26.
29. Produce any Communications by, to, or between all Persons employed by You that hold the position (or equivalent position) of a corporate officer, senior executive, or top-level manager Relating to the use of Your Products by Young Users, the mental or physical health impacts or effects Relating to the use of Your Products by Young Users, or the diversity of content curated for Young Users by Your recommendation system.
30. Produce Documents comprising preparatory materials, agendas, minutes or related Documents prepared by or for Your Board of Directors Relating to the use of Your Products by Young Users and the mental or physical health impacts or effects Relating to the use of Your recommendation system.
31. Produce Documents sufficient to show all representations to Users, potential Users, or the public Relating to the safety, risks, or benefits of Your Product to Users or Young Users, including without limitation, representations made in Your privacy policy, terms and conditions, advertising, marketing, videos, blog posts, press releases, email, pop-up screens, government testimony, public speaking, and Product menus or controls.
32. Produce Documents sufficient to show all representations to investors, potential investors, advertisers, academics, researchers, or the government Relating to the safety, risks, or benefits of Your Product to Users or Young Users.
33. Produce Documents, including Communications, Relating to or with Persons acting on behalf of the below entities and groups:
 - a. Common Sense Networks (including but not limited to Eric Berger);
 - b. National PTA (including but not limited to Leslie Boggs, Nathan R. Monell, Howie Berman);

⁴ <https://newsroom.tiktok.com/en-us/an-update-on-our-work-to-safeguard-and-diversifyrecommendations>.

- c. Connect Safely (including but not limited to Larry Magid);
- d. Family Online Safety Institute (including but not limited to Stephen Balkam);
- e. MediaSmarts (including but not limited to Kathryn Ann Hill);
- f. National Center for Missing and Exploited Children (including but not limited to John Clark and Michelle DeLaune);
- g. WePROTECT Global Alliance (including but not limited to Iain Drennan);
- h. The Technology Coalition (including but not limited to Erin Saltman);
- i. National Alliance for Eating Disorders (including but not limited to Johanna Kandel); and
- j. Internet Watch Foundation (including but not limited to Susie Hargreaves, Derek Ray-Hill, and Kerry Smith).

This request includes but is not limited to Documents Relating to Your provision of funding, data, or any goods or services to any of the above individuals, groups, or entities, and any agreements or contracts with any of the above individuals, groups, or entities.

CATHERINE L. HANAWAY
ATTORNEY GENERAL

/s/ Louis J. Capozzi III
Louis J. Capozzi III, Mo. Bar No. 77756
Solicitor General
Kathleen Hunker, Mo. Bar No. 78819
Principal Deputy Solicitor General
Alexandria L. Overcash, Mo. Bar No. 78289
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(573) 645-9662

IN THE MATTER OF:

CID No. 26-212

TIKTOK, INC.

October 14, 2026

CERTIFICATION OF COMPLIANCE

I certify that all documents and information required by Civil Investigative Demand No. 26-212, which is in the possession, custody, control, or knowledge of TIKTOK, INC., has been submitted to the Missouri Attorney General as directed.

Signature

Printed Name

Position

Date

State of Missouri)

County of _____)

On this day, _____ personally appeared before me, a notary public in Missouri. I know him to be the individual who signed this document, and he acknowledged to me that he signed it for the purposes stated in it.

Notary Public

Date