

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

IN RE
INVESTIGATION OF TIKTOK, INC.

Case No. 23-0298-TE

2023 MAR -6 AM 8:21
CLERK OF COURT
DAVIDSON COUNTY
CHANCERY CT

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

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

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

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

4. This case squarely implicates the States' significant interest in protecting vulnerable citizens of their states and the public, particularly children and teens, from harms caused by TikTok, as well as the States' need to obtain critical information in response to requests made in the context of multistate investigations.¹ The 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. The States submit this brief to assist the Court in resolving the controversy between the parties by providing information about the scope of widespread public interest at issue in

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

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

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

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

Dated: March 6, 2023.

Respectfully Submitted,

ATTORNEY GENERAL FOR THE STATE
OF KENTUCKY

/s/ Zachary J Richards
ZACHARY J RICHARDS, B.P.R. No. 037344
Assistant Attorney General
DANIEL CAMERON
Attorney General
Kentucky Office of the Attorney General
Office of Consumer Protection
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
E-Mail(s): Zach.Richards@ky.gov

FOR THE ATTORNEY GENERAL FOR
THE STATE OF COLORADO

/s/ Philip J. Weiser
PHILIP J. WEISER
Attorney General
ABIGAIL M. HINCHCLIFF
First Assistant Attorney General
MEGAN PARIS RUNDLET
Senior Assistant Solicitor General
BIANCA MIYATA
Senior Assistant Attorney General
JILL SZEWCZYK
Assistant Attorney General
STEVIE DEGROFF
Assistant Attorney General
SHALYN KETTERING
Assistant Attorney General
ELIZABETH OREM
Fellow
GABE LENNON
Fellow
Colorado Department of Law

Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, Colorado 80203

E-Mail(s): Abigail.Hinchcliff@coag.gov

Megan.Rundlet@coag.gov

Bianca.Miyata@coag.gov

Jill.Szewczyk@coag.gov

Stevie.DeGroff@coag.gov

Shalyn.Kettering@coag.gov

Beth.Orem@coag.gov

Gabe.Lennon@coag.gov

NOTICE OF HEARING

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

CERTIFICATE OF SERVICE

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

TikTok, Inc.
Corporation Service Company
2908 Poston Avenue
Nashville, Tennessee 37203-1312
Via Hand-Delivery

Ashley Anguas Nyquist, Esq.
Covington & Burling LLP
One CityCenter, 850 Tenth Street, NW
Washington, DC 20001-4956
Via E-Mail: anyquist@cov.com

Daniel R. Suvor, Esq.
Jonathan P. Schneller, Esq.
Jonathan C. Le, Esq.
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor
Los Angeles, California 90071
*Via E-Mail: dsuvor@omm.com
jschneller@omm.com
jle@omm.com*

Jeffrey A. N. Kopczynski, Esq.
O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, New York 10036
Via E-Mail: jkopczynski@omm.com

This the 6th day of March 2023.



MATTHEW D. JANSSEN, B.P.R. No. 035451
Senior Assistant Attorney General

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

IN RE

INVESTIGATION OF TIKTOK, INC.

Case No.

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

The *Amici* States¹ of Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii², Idaho, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Texas, Utah, Vermont, Virginia, Wisconsin, and Wyoming submit this brief in support of the Motion to Compel filed by the State of Tennessee. The Court has discretion to permit the states' attorneys general to appear as *amici* and provide supplemental briefing to assist the Court in resolving Tennessee's action to enforce its requests for information. *See, e.g., State ex*

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

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

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

I. INTEREST OF *AMICI CURIAE*

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

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

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

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

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

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

II. INTRODUCTION AND STATEMENT OF ISSUES

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

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

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

III. STATEMENT OF FACTS

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

IV. ARGUMENT

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

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

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

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

⁷ *Id.*

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

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

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

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

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

¹⁰ *Id.*

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

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

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

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

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

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

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

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

¹⁶ Emily A. Vogels et al., *Teens, Social Media and Technology 2022*, PEW RESEARCH CTR. (Aug. 10, 2022), <https://www.pewresearch.org/internet/2022/08/10/teens-social-media-and-technology-2022/>.

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

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

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

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

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

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

V. CONCLUSION

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

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

Dated: March 6, 2023

Respectfully Submitted,

ATTORNEY GENERAL FOR
THE STATE OF KENTUCKY

/s/ Zachary J Richards

ZACHARY J RICHARDS, B.P.R. No. 037344
Assistant Attorney General
DANIEL CAMERON
Attorney General
Kentucky Office of the Attorney General
Office of Consumer Protection
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
E-Mail(s): Zach.Richards@ky.gov

FOR THE ATTORNEY GENERAL FOR
THE STATE OF COLORADO

/s/ Philip J. Weiser

PHILIP J. WEISER
Attorney General
ABIGAIL M. HINCHCLIFF
First Assistant Attorney General
MEGAN PARIS RUNDLET
Senior Assistant Solicitor General
BIANCA MIYATA
Senior Assistant Attorney General
JILL SZEWCZYK
Assistant Attorney General
STEVIE DEGROFF
Assistant Attorney General
SHALYN KETTERING
Assistant Attorney General
ELIZABETH OREM
Fellow
GABE LENNON
Fellow
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor

ATTORNEY GENERAL FOR THE STATE
OF ALABAMA

/s/ Steve Marshall

STEVE MARSHALL
Attorney General
Alabama Office of the Attorney General
501 Washington Avenue
Montgomery, AL 36104

Denver, Colorado 80203

E-Mail(s): Abigail.Hinchcliff@coag.gov

Megan.Rundlet@coag.gov

Bianca.Miyata@coag.gov

Jill.Szewczyk@coag.gov

Stevie.DeGroff@coag.gov

Shalyn.Kettering@coag.gov

Beth.Orem@coag.gov

Gabe.Lennon@coag.gov

ATTORNEY GENERAL FOR THE STATE
OF ALASKA

/s/ Treg Taylor

TREG TAYLOR

Attorney General

Alaska Office of the Attorney General

1031 West Fourth Avenue, Suite 200

Anchorage, AK 99501

ATTORNEY GENERAL FOR THE STATE
OF ARIZONA

/s/ Kris Mayes

KRIS MAYES

Attorney General

Arizona Office of the Attorney General

2005 North Central Avenue

Phoenix, AZ 85004

ATTORNEY GENERAL FOR THE STATE
OF CALIFORNIA

/s/ Rob Bonta

ROB BONTA

Attorney General

California Department of Justice

455 Golden Gate Avenue, 11th Floor

San Francisco, CA 94102

ATTORNEY GENERAL FOR THE STATE
OF DELAWARE

/s/ Kathy Jennings

KATHY JENNINGS

Attorney General

Delaware Department of Justice

Carvel State Building

820 N. French Street

Wilmington, DE 19801

ATTORNEY GENERAL FOR THE
DISTRICT OF COLUMBIA

/s/ Brian Schwalb

BRIAN SCHWALB

Attorney General

District of Columbia Office of the Attorney
General

400 6th Street NW

Washington, D.C. 20001

ATTORNEY GENERAL FOR THE STATE
OF FLORIDA

/s/ Ashley Moody

ASHLEY MOODY

Attorney General

Florida Office of the Attorney General

PL-01, The Capitol

Tallahassee, FL 32399

ATTORNEY GENERAL FOR THE STATE
OF GEORGIA

/s/ Chris Carr
CHRIS CARR
Attorney General
Georgia Department of Law
40 Capitol Square SW
Atlanta, GA 30334

EXECUTIVE DIRECTOR FOR THE
STATE OF HAWAII OFFICE OF
CONSUMER PROTECTION

/s/ Mana Moriarty
MANA MORIARTY
Executive Director
Hawaii Office of Consumer Protection
235 South Beretania Street, Room 801
Honolulu, HI 96813

ATTORNEY GENERAL FOR THE STATE
OF ILLINOIS

/s/ Kwame Raoul
KWAME RAOUL
Attorney General
Illinois Office of the Attorney General
500 South Second Street
Springfield, IL 62701

ATTORNEY GENERAL FOR THE STATE
OF IOWA

/s/ Brenna Bird
BRENNIA BIRD
Attorney General
Iowa Office of the Attorney General
1305 E. Walnut Street
Des Moines, IA 50319

ATTORNEY GENERAL FOR THE STATE
OF HAWAII

/s/ Anne E. Lopez
ANNE E. LOPEZ
Attorney General
Department of the Attorney General
425 Queen Street
Honolulu, HI 96813

ATTORNEY GENERAL FOR THE STATE
OF IDAHO

/s/ Raúl Labrador
RAUL LABRADOR
Attorney General
Idaho Office of the Attorney General
700 West Jefferson Street, #210
Boise, ID 83720

ATTORNEY GENERAL FOR THE STATE
OF INDIANA

/s/ Theodore E. Rokita
THEODORE E. ROKITA
Attorney General
Indiana Office of the Attorney General
302 West Washington Street
Indianapolis, IN 46204

ATTORNEY GENERAL FOR THE STATE
OF ARKANSAS

/s/ Tim Griffin
TIM GRIFFIN
Attorney General
Arkansas Office of the Attorney General
323 Center Street, Suite 200
Little Rock, AR 72201

ATTORNEY GENERAL FOR THE STATE
OF LOUISIANA

/s/ Jeff Landry
JEFF LANDRY
Attorney General
Louisiana Office of the Attorney General
1885 North 3rd Street
Baton Rouge, LA 70802

ATTORNEY GENERAL FOR THE STATE
OF MARYLAND

/s/ Anthony G. Brown
ANTHONY G. BROWN
Attorney General
Maryland Office of the Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, MD 21202

ATTORNEY GENERAL FOR THE STATE
OF MISSISSIPPI

/s/ Lynn Fitch
LYNN FITCH
Attorney General
Mississippi Office of the Attorney General
Post Office Box 220
Jackson, MS 39205

ATTORNEY GENERAL FOR THE STATE
OF MONTANA

/s/ Austin Knudsen
AUSTIN KNUDSEN
Attorney General
Montana Department of Justice
555 Fuller Avenue
Post Office Box 200151
Helena, MT 59620-0501

ATTORNEY GENERAL FOR THE STATE
OF MAINE

/s/ Aaron M. Frey
AARON M. FREY
Attorney General
Maine Office of the Attorney General
6 State House Station
Augusta, ME 04333

ATTORNEY GENERAL FOR THE STATE
OF MASSACHUSETTS

/s/ Andrea Campbell
ANDREA CAMPBELL
Attorney General
Massachusetts Office of the Attorney General
One Ashburton Place
Boston, MA 02108

ATTORNEY GENERAL FOR THE STATE
OF MISSOURI

/s/ Andrew Bailey
ANDREW BAILEY
Attorney General
Missouri Office of the Attorney General
207 West High Street
Post Office Box 899
Jefferson City, MO 65102

ATTORNEY GENERAL FOR THE STATE
OF NEBRASKA

/s/ Mike Hilgers
MIKE HILGERS
Attorney General
Nebraska Office of the Attorney General
2115 State Capitol Building
Lincoln, NE 68509

ATTORNEY GENERAL FOR THE STATE
OF NEVADA

/s/ Aaron Ford
AARON FORD
Attorney General
Nevada Office of the Attorney General
555 East Washington Avenue, #3900
Las Vegas, NV 89101

ATTORNEY GENERAL FOR THE STATE
OF NEW JERSEY

/s/ Matthew J. Platkin
MATTHEW J. PLATKIN
Attorney General
New Jersey Office of the Attorney General
Richard J. Hughes Justice Complex
25 Market Street
Trenton, NJ 08611

ATTORNEY GENERAL FOR THE STATE
OF NEW YORK

/s/ Letitia A. James
LETITIA A. JAMES
Attorney General
New York Office of the Attorney General
The Capitol
Albany, NY 12224-0341

ATTORNEY GENERAL FOR THE STATE
OF NORTH DAKOTA

/s/ Drew Wrigley
DREW WRIGLEY
Attorney General
North Dakota Office of the Attorney General
600 E. Boulevard Avenue, #125
Bismarck, ND 58505

ATTORNEY GENERAL FOR THE STATE
OF NEW HAMPSHIRE

/s/ John Formella
JOHN FORMELLA
Attorney General
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301

ATTORNEY GENERAL FOR THE STATE
OF NEW MEXICO

/s/ Raúl Torrez
RAUL TORREZ
Attorney General
New Mexico Office of the Attorney General
408 Galisteo Street
Santa Fe, NM 87501

ATTORNEY GENERAL FOR THE STATE
OF NORTH CAROLINA

/s/ Josh Stein
JOSH STEIN
Attorney General
North Carolina Department of Justice
114 West Edenton Street
Raleigh, NC 27603

ATTORNEY GENERAL FOR THE STATE
OF OKLAHOMA

/s/ Gentner Drummond
GENTNER DRUMMOND
Attorney General
Oklahoma Office of the Attorney General
313 N.E. 21st Street
Oklahoma City, OK 73105

ATTORNEY GENERAL FOR THE STATE
OF OREGON

/s/ Ellen Rosenblum

ELLEN ROSENBLUM
Attorney General
Oregon Department of Justice
100 SW Market Street
Portland, OR 97201

ATTORNEY GENERAL FOR THE STATE
OF PENNSYLVANIA

/s/ Michelle A. Henry

MICHELLE A. HENRY
Attorney General
Pennsylvania Office of the Attorney General
Mezzanine Level
1251 Waterfront Place
Pittsburgh, PA 15222

ATTORNEY GENERAL FOR THE STATE
OF RHODE ISLAND

/s/ Peter Neronha

PETER NERONHA
Attorney General
Rhode Island Office of the Attorney General
150 South Maine Street
Providence, RI 02903

ATTORNEY GENERAL FOR THE STATE
OF SOUTH CAROLINA

/s/ Alan Wilson

ALAN WILSON
Attorney General
South Carolina Office of the Attorney
General
Post Office Box 11549
Columbia, SC 29211

ATTORNEY GENERAL FOR THE STATE
OF SOUTH DAKOTA

/s/ Marty Jackley

MARTY JACKLEY
Attorney General
South Dakota Office of the Attorney General
1302 East Highway 14, Suite 1
Pierre, SD 57501-8501

ATTORNEY GENERAL FOR THE STATE
OF TEXAS

/s/ Ken Paxton

KEN PAXTON
Attorney General
Texas Office of the Attorney General
Post Office Box 12548
Austin, TX 78711-2548

ATTORNEY GENERAL FOR THE STATE
OF UTAH

/s/ Sean Reyes

SEAN REYES
Attorney General
Utah Office of the Attorney General
Capitol Complex
350 North State Street, Suite 230
Salt Lake City, UT 84114-2320

ATTORNEY GENERAL FOR THE STATE
OF VERMONT

/s/ Charity R. Clark

CHARITY R. CLARK
Attorney General
Vermont Office of the Attorney General
109 State Street
Montpelier, VT 05609

ATTORNEY GENERAL FOR THE STATE
OF VIRGINIA

/s/ Jason Miyares

JASON MIYARES
Attorney General
Virginia Office of the Attorney General
202 North 9th Street
Richmond, VA 23219

ATTORNEY GENERAL FOR THE STATE
OF WISCONSIN

/s/ Josh Kaul

JOSH KAUL
Attorney General
Wisconsin Department of Justice
17 West Main Street
Post Office Box 7857
Madison, WI 53707-7857

ATTORNEY GENERAL FOR THE STATE
OF WYOMING

/s/ Bridget Hill

BRIDGET HILL
Attorney General
Wyoming Office of the Attorney General
200 West 24th Street
Cheyenne, WY 82002

ATTORNEY GENERAL FOR THE STATE
OF CONNECTICUT

/s/ William Tong

WILLIAM TONG
Attorney General
Connecticut Office of the Attorney General
165 Capitol Avenue
Hartford, CT 06134

ATTORNEY GENERAL FOR THE STATE
OF MINNESOTA

/s/ Keith Ellison

KEITH ELLISON
Attorney General
Minnesota Office of the Attorney General
102 State Capitol
75 Rev. Dr. Martin Luther King Jr. Blvd.
St. Paul, MN 55155

ATTORNEY GENERAL FOR THE STATE
OF MICHIGAN

/s/ Dana Nessel

DANA NESSEL
Attorney General
Michigan Office of the Attorney General
Post Office Box 30212
Lansing, MI 48909