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9 **IN THE SUPERIOR COURT OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

11 KAIRA RYSDAM, individually and as
12 successor-in-interest to Brehnan "Bear"
13 Rysdam, Deceased (from Oregon); S.B. and
14 N.B. (from Hawaii); N.G. and S.G. (from New
15 York); B.H. and S.H. (from Indiana); V.T. and
16 L.M. (from Florida); Y.G. and G.B. (from
17 Arizona); GERMANY LEAZER (from North
18 Carolina); and SHEILIA ADAMS (from
19 CALIFORNIA),

20 Plaintiff(s),

21 v.

22 META PLATFORMS, INC.; INSTAGRAM,
23 LLC; FACEBOOK PAYMENTS, INC.;
24 SICULUS, INC.; FACEBOOK OPERATIONS,
25 LLC; SNAP, INC.; BYTEDANCE, LTD.;
26 BYTEDANCE, INC; TIKTOK, LTD.;
27 TIKTOK, LLC; TIKTOK, INC.; GOOGLE
28 LLC; YOUTUBE, LLC; DISCORD, INC.;
ROBLOX CORPORATION; and DOES 1-50,

Defendant(s).

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CIVIL ACTION NO. 26SMCV04041

COMPLAINT

JURY DEMAND

1 **I. INTRODUCTION**

2 1. Children are suffering an unprecedented mental health crisis on a global scale.

3 2. This crisis has been building since the first decade of the twenty-first century, shortly
4 after Defendants META PLATFORMS, INC., INSTAGRAM, LLC. FACEBOOK PAYMENTS,
5 INC., SICULUS, INC., FACEBOOK OPERATIONS, LLC (collectively, “Meta”), SNAP, INC.
6 (“Snap”), BYTEDANCE, LTD., BYTEDANCE, INC, TIKTOK, LTD., TIKTOK, LLC, TIKTOK,
7 INC. (collectively, “ByteDance” or “TikTok”), GOOGLE LLC and YOUTUBE, LLC (collectively,
8 “Google” or “YouTube”), DISCORD, INC. (“Discord”), and ROBLOX CORPORATION
9 (“Roblox”) began designing, manufacturing, and distributing addictive, defective, and dangerous
10 social media products and features.

11 3. Defendants knew that their social media products were defective and/or inherently
12 dangerous and marketed to and aimed them at children. In the words of Defendant Meta Platforms
13 Inc., “the young ones are the best ones. You want to bring people to your service young and early.”¹

14 4. Defendants then engaged in calculated and extensive efforts to deceive consumers
15 about the risks and benefits associated with use of their products, while exploiting young people
16 into compulsive and inherently harmful patterns of use. Borrowing heavily from the behavioral and
17 neurobiological techniques used by slot machines and the cigarette industry, these companies
18 deliberately embedded in their products an array of design features aimed at maximizing youth
19 engagement to drive advertising revenue.

20 5. Defendants know children are in a developmental stage that leaves them particularly
21 vulnerable to the addictive effects of such features and Defendants targeted them because of this.

22 6. The defects in Defendants’ products vary by platform, but all exploit children and
23 adolescents. They include but are not limited to an artificial intelligence driven endless feed to keep
24 users scrolling in an induced “flow state,” “intermittent variable rewards” that manipulate dopamine
25 delivery to intensify use, “trophies” to reward extreme usage, metrics and graphics to exploit social
26 comparison, incessant notifications that encourage repetitive account checking by manufacturing
27

28 ¹ *State of Arizona, et. al. v. Meta*, N.D. Cal., Complaint filed Nov. 22, 2023, ¶ 68.

1 insecurity, inherently harmful programming designed to prioritize engagement over safety including
2 by matchmaking adult strangers with vulnerable youth, invasive collection of private data and then
3 disclosure of that data to strangers, inadequate and essentially illusory age verification protocols,
4 and deficient tools for parents that create the illusion of control.

5 7. Defendants’ choices have generated extraordinary corporate profits—and yielded
6 immense tragedy. In the United States alone, suicide rates for youth are up an alarming 57% and
7 emergency room visits for anxiety disorders are up 117%. By 2019, one in five high school girls in
8 the United States had made a suicide plan, and, by 2021, one in three had seriously considered
9 suicide. Children and families around the world have struggled to cope with the severe, lasting
10 damage inflicted on them by Defendants in the form of exploitation, anxiety, depression, eating
11 disorders, substance use disorders, suicidal behaviors, and death.

12 8. This lawsuit follows on a growing body of scientific research, including Defendants’
13 own internal studies, which draws direct lines between Defendants’ conscious, intentional design
14 choices and the youth mental health crisis spreading across the world like wildfire. In the words of
15 Facebook’s first founding president, Sean Parker, Defendants designed their products to “consume
16 as much of your time and conscious attention as possible,” knew that they were taking risks with
17 “children’s brains” and “did it anyway.”²

18 9. Disconnected “Likes” replaced the intimacy of adolescent friendships; mindless
19 scrolling displaced the creativity of play and sport; children became products bought and sold by
20 the small handful of companies amassing unprecedented money and influence seemingly overnight.

21 10. Defendants relentlessly pursued a strategy of growth-at-all-costs, recklessly ignoring
22 the impact of their products on children’s mental and physical health and well-being. In a race to
23 corner the “valuable but untapped” market of tween and teen users, Defendants designed product
24 features to promote repetitive, uncontrollable use by kids.³

26 ² Mike Allen, *Sean Parker unloads on Facebook: “God only knows what it’s doing to our children’s brains”*, AXIOS
27 (Nov. 9, 2017), <https://www.axios.com/2017/12/15/sean-parker-unloads-on-facebook-god-only-knows-what-its-doing-to-our-childrens-brains-1513306792>.

28 ³ Georgia Wells & Jeff Horwitz, *Facebook’s Effort to Attract Preteens Goes Beyond Instagram Kids, Documents Show*, WALL ST. J. (Sept. 28, 2021, 11:24 PM), <https://www.wsj.com/articles/facebook-instagram-kids-tweens-attract-11632849667>; see also Haugen 00022339.

1 11. And their strategy paid off.

2 12. Users of their products now number in the billions, and the frequency and time spent

3 by these users has grown exponentially. This has allowed Defendants to harvest a vast amount of

4 personal user data—from the school you attend, to the sneakers you covet, to the places you’ve been

5 and the people you’ve met – which, in turn, has allowed Defendants to mint a fortune.⁴

6 13. Defendants’ growth, however, came at the expense of their most vulnerable users:

7 children. The children at issue in this complaint and their families are not merely the collateral

8 damage of Defendants’ choices but are the direct victims of intentional product design.

9 14. As a direct result of Defendants’ successful promotion of their defective products,

10 the rates of mental health issues among children have climbed steadily since 2010. By 2018, suicide

11 was the second leading cause of death for youth.⁵

12 15. In December of 2021, the United States Surgeon General, Vivek Murthy, recognized

13 the Defendants’ dangerous designs and their abdication of responsibility for resulting harms:

14 In these digital public spaces, which are privately owned and tend to be run for

15 profit, there can be tension between what’s best for the technology company and

16 what’s best for the individual user or for society. Business models are often built

17 around maximizing user engagement as opposed to safeguarding users’ health and

18 ensuring that users engage with one another in safe and healthy ways

18 **[T]echnology companies must step up and take responsibility for creating a**

19 **safe digital environment for children and youth.** Today, most companies are not

20 transparent about the impact of their products, which prevents parents and young

21 people from making informed decisions and researchers from identifying problems

22 and solutions.⁶

21 16. Then, on June 17, 2024, Surgeon General Murthy warned the world again, writing

22 that, “The mental health crisis among young people is an emergency — and social media has

23 emerged as an important contributor.”⁷ He now is calling for the U.S. Congress to “require a

24 ⁴ See Snap, Inc., 2022 Annual Report (Form 10-K) at 15 (Jan. 31, 2023) (“[W]e rely heavily on our ability to collect

25 and disclose data[] and metrics to our advertisers so we can attract new advertisers and retain existing advertisers. Any

26 restriction or inability, whether by law, regulation, policy, or other reason, to collect and disclose data and metrics

27 which our advertisers find useful would impede our ability to attract and retain advertisers.”).

26 ⁵ Melonie Heron, *Deaths: Leading Causes for 2018*, 70(4), Nat’l Vital Statistics Reports 1, 10 (2021),

27 <https://www.cdc.gov/nchs/data/nvsr/nvsr70/nvsr70-04-508.pdf>.

27 ⁶ U.S. Surgeon General’s Advisory, *Protecting Youth Mental Health* (Dec. 7, 2021),

28 <https://www.hhs.gov/sites/default/files/surgeon-general-youth-mental-health-advisory.pdf> (emphasis in original).

28 ⁷ Vivek H. Murthy, *Surgeon General: Why I’m Calling for a Warning Label on Social Media Platforms*, N.Y. TIMES

(June 17, 2024), <https://www.nytimes.com/2024/06/17/opinion/social-media-health-warning.html#>.

1 surgeon general’s warning label on social media platforms, stating that social media is associated
2 with significant mental health harms for adolescents” and urging for legislation to reign in the
3 incredible harms these companies are causing to our youth,

4
5 Legislation from Congress should shield young people from online harassment,
6 abuse and exploitation and from exposure to extreme violence and sexual content
7 that too often appears in algorithm-driven feeds. The measures should prevent
8 platforms from collecting sensitive data from children and should restrict the use of
9 features like push notifications, autoplay and infinite scroll, which prey on
10 developing brains and contribute to excessive use.

11 Additionally, companies must be required to share all of their data on health effects
12 with independent scientists and the public — currently they do not — and allow
13 independent safety audits. While the platforms claim they are making their products
14 safer, Americans need more than words. We need proof.⁸

15 17. These statements by the Surgeon General are in line with a substantial body of peer-
16 reviewed scientific literature documenting the harmful impact that Defendants’ products have on
17 our children, including the various injuries suffered by the children in this Complaint. First, it is
18 important to note that for years these companies have prevented the scientific community and
19 governments around the world from gaining access to the types of data needed to understand the
20 impacts of their designs and business decisions on consumers – all while conducting their own
21 studies, confirming evidence of product-caused harms, and then using from those studies
22 information that might increase revenue and growth while often disregarding consumer safety.
23 Second, even limited by the near insurmountable hurdles these companies have erected, this body
24 of emerging research demonstrates that Defendants’ defectively designed products can cause the
25 harms plaguing children across the world: addiction and/or compulsive use, anxiety, depression,
26 eating disorders, body dysmorphia, self-harm, sexual exploitation, substance use disorders, suicidal
27 thoughts, and even death.

28 18. Defendants knew about the risks; could have fixed their products to avoid the harms
and at little cost; could have warned parents and the public about the dangers of their designs; but
instead, chose to stay the course and convince consumers that their products were safe, fun, and age-

⁸ *Id.*

1 appropriate for the world's youth instead.

2 19. Plaintiffs now bring this action for personal injuries and, where applicable, wrongful
3 death, against Defendants for harms caused because of their platforms and wrongful conduct,
4 including: (a) designing defective products that caused serious injuries to users; (b) failing to provide
5 adequate warnings about serious and reasonably foreseeable health risks from product use; (c)
6 failing to utilize reasonable care in, among other things, developing, designing, managing,
7 operating, testing, producing, labeling, marketing, advertising, promoting, controlling, selling,
8 supplying, and distributing their products; and (d) engaging in deliberate concealment,
9 misrepresentation, and obstruction of public awareness of serious health risks to users. Plaintiffs
10 further allege that Defendants acted with intent and willful disregard for human life.

11 **II. THE PARTIES**

12 **A. PLAINTIFFS**

13 20. This Complaint is filed by 8 plaintiffs across 8 different U.S. states, including
14 Arizona, California, Florida, Hawaii, Indiana, New York, North Carolina, and Oregon, on behalf
15 of children ages 12, 13, 14, 15, 16, 17, 18, and 19 and who suffered personal injuries due to their
16 use of Defendants' products (collectively, "Plaintiffs").

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

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

26 **B. DEFENDANTS**

27 23. The defendants identified in this section are collectively referred to as "Defendants"
28

1 throughout this Complaint.

2 **1. Meta**

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

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

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

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

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

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

22 30. Meta Platforms, Instagram, Siculus, Facebook 1, and Facebook 2 are referred to
23 jointly as “Meta.”

24 31. Meta owns, operates, controls, produces, designs, maintains, manages, develops,
25 tests, labels, markets, advertises, promotes, supplies, and distributes digital products available
26 through mobile- and web-based applications (“apps”), including Instagram and Facebook (together,
27 “Meta products”); Messenger; and Messenger Kids, as well as well as the virtual reality (VR)
28 headset, Oculus. Meta’s apps and devices are widely distributed to consumers throughout the United

1 States.

2 **2. Snap**

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

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

8 **3. ByteDance**

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

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

14 36. ByteDance Ltd.’s key Chinese subsidiary is Beijing Douyin Information Service
15 Limited, f/k/a Beijing ByteDance Technology Co. Ltd. (“Beijing ByteDance”).⁹ Beijing ByteDance
16 owns, operates, and holds key licenses to Douyin, the Chinese version of TikTok. On or around
17 April 30, 2021, the Chinese government took a 1% stake in, and received one of three seats on the
18 board of directors of, Beijing ByteDance.¹⁰ Specifically, 1% of Beijing ByteDance is now owned
19 by WangTouZhongWen (Beijing) Technology, which in turn is owned by China Internet Investment
20 Fund (China’s top Internet regulator and censor), China Media Group (China’s national broadcaster,
21 controlled by the Chinese Communist Party’s propaganda department), and the Beijing municipal
22 government’s investment arm.

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

25
26 ⁹ 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>.

27 ¹⁰ See Juro Osawa & Shai Oster, *Beijing Tightens Grip on ByteDance by Quietly Taking Stake, China Board Seat*, The
28 Information (Aug. 16, 2021), available at <https://www.theinformation.com/articles/beijing-tightens-grip-on-bytedance-by-quietly-taking-stake-china-board-seat?rc=ubpjcg>.

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

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

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

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

11 **4. Google**

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

16 43. Since 2006, Google has operated, done business as, and wholly owned as its
17 subsidiary Defendant YouTube, LLC (“YouTube, LLC”). YouTube, LLC is a Delaware limited
18 liability company with its principal place of business in San Bruno, CA. YouTube is widely
19 available to consumers throughout the United States.¹¹

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

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

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¹¹ 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 **5. Discord**

2 46. Defendant Discord, Inc. (“Discord”) is a Delaware corporation. Its principal place of
3 business is in San Francisco, CA.

4 47. Discord owns, operates, controls, produces, designs, maintains, manages, develops,
5 tests, labels, markets, advertises, promotes, supplies, and distributes the app Discord.

6 **6. Roblox**

7 48. Defendant Roblox Corporation (“Roblox”) is a Delaware corporation. Its principal
8 place of business is in San Mateo, CA.

9 49. Roblox owns, operates, controls, produces, designs, maintains, manages, develops,
10 tests, labels, markets, advertises, promotes, supplies, and distributes the app Roblox.

11 **III. JURISDICTION AND VENUE**

12 50. This Court has personal jurisdiction over Defendants because they are incorporated
13 in and have their principal places of business in California, and because they have contacts with
14 California that are so continuous and systematic that they are essentially at home in this state. All
15 Defendants regularly conduct and solicit business in California, provide products and/or services by
16 or to persons here, and derive substantial revenue from the same. All Defendants affirmatively and
17 extensively engage with a significant percentage of this State’s residents through messages,
18 notifications, recommendations, and other communications.

19 51. There is no federal jurisdiction in this case. All claims are brought pursuant to
20 California state law. There are no federal causes of action and Plaintiff expressly disclaim any
21 federal causes of action.

22 52. Venue is proper in Los Angeles County because one or more defendants are
23 headquartered here and/or one or more Plaintiffs reside here; in addition, Plaintiffs will be relating
24 this case to and filing a Short Form Complaint in Judicial Council Coordination Proceeding No.
25 5255 (“JCCP 5255”), which proceeding is pending in Los Angeles County.

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

2 **A. GENERAL FACTUAL ALLEGATIONS APPLICABLE TO ALL**
3 **DEFENDANTS**

4 53. On May 15, 2023, a Master Complaint was filed in JCCP 5255, on May 15, 2023
5 (“Master Complaint”), in Los Angeles County Superior Court. Plaintiffs hereby incorporate and
6 adopt Sections IV.A.1 through IV.A.7 of the Master Complaint as though set forth in full herein.

7 54. Defendants purposefully designed their products to act with children on the same
8 neurological pleasure circuitry as is involved in addiction to nicotine, alcohol, or cocaine. They
9 know that they are causing these harms and continue to do so despite such knowledge, and children
10 around the world are suffering terrible harms as a direct result. As explained in the article, “Has
11 Social Media Fuelled a Teen-Suicide Crisis,” published in The New Yorker on September 30, 2024,

12 Social media acts on the same neurological pleasure circuitry as is involved in
13 addiction to nicotine, alcohol, or cocaine. Predictable rewards do not trigger this
14 system nearly as effectively as unpredictable ones; slot-machine manufacturers
15 know this, and so do social-media companies. “Teens are insatiable when it comes
16 to ‘feel good’ dopamine effects,” a Meta document cited in the attorneys general’s
17 complaint noted. Instagram “has a pretty good hold on the serendipitous aspect of
18 discovery. . . . Every time one of our teen users finds something unexpected their
19 brains deliver them a dopamine hit.” Judith Edersheim, a co-director of the Center
20 for Law, Brain & Behavior, at Harvard, likens the effect to putting children in a
21 twenty-four-hour casino and giving them chocolate-flavored bourbon. “The
22 relentlessness, the intrusion, it’s all very intentional,” she told me. “No other
23 addictive device has ever been so pervasive.”

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

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

27 56. Facebook founder and CEO, Mark Zuckerberg, designed and launched The
28 Facebook in February 2004. At the time, it included a number of basic safety features, which made
sense given the intimate nature of the platform. Zuckerberg was constructing a virtual space and
wanted college students to be incentivized to share photos and personal updates with peers.¹²

¹² See, e.g., Brittany Kasko, *Mark Zuckerberg was a college student when he co-developed the social media platform*, FOX NEWS (Feb. 4, 2024, 12:02 AM), <https://www.foxnews.com/lifestyle/this-day-history-feb-4-2004-harvard-student-mark-zuckerberg-launches-the-facebook>. For example, The Facebook was limited to college students, and access required verification via a school issued email address. This verification process would also have presumably prevented students from being able to open multiple accounts.

1 57. While the social aspect of The Facebook was a new concept, the platform otherwise
2 functioned like other apps at the time. It was something that college students used and not the other
3 way around. They could use it to search for and look people up, and view individuals to whom they
4 were now virtually connected. But then things changed, or rather, Meta changed them.

5 58. Meta and its founders recognized an opportunity to not just make money, but to make
6 unprecedented amounts of it by turning consumers into the product and advertisers into customers.

7 59. In September 2006, Meta began allowing anyone over 13 to sign up and by October
8 2009, Meta had switched its feed features from chronological sorting to algorithmic ranking.

9 60. Meta has failed and/or refuse to be transparent as to how it is programming these
10 technologies; while internally, it has repeatedly acknowledged the harms these decisions are causing
11 to children. None of this is about content, but instead, involves product features and settings as
12 nuanced as algorithm speed. For example, on information and belief, Meta has known for years that
13 if it simply gave young users the option to slow the speed of the content recommendation algorithm
14 at night, many of those children would be able to sleep. Instead, Meta continues to design and
15 distribute its product in a manner intended to manipulate children into doom scrolling for hours, and
16 during times they are supposed to be sleeping or in school.

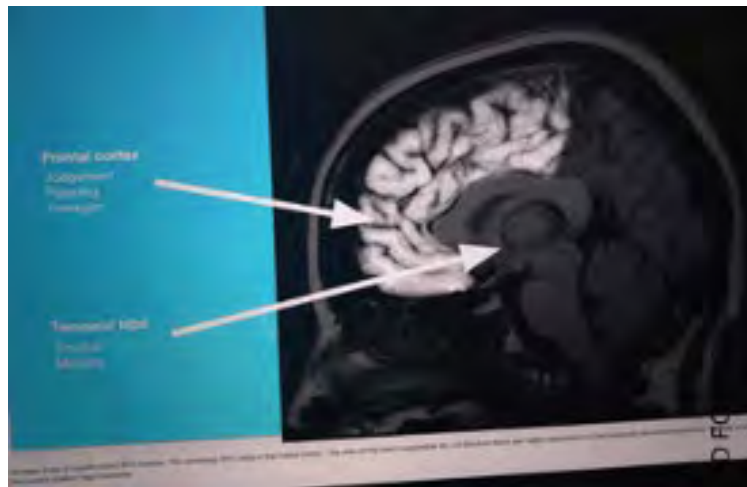
17 61. Rather than warn consumers about the potential risks of using its product, however,
18 Meta (and the handful of companies that emerged in this new industry) began convincing consumers
19 and governments around the world that their innovation would change our lives for the better. That
20 their products would connect countries and people across the globe, all while using the most
21 advanced technologies to ensure a safe and healthy experience for their users, including children.

22 62. They fueled this optimism with credible assurances and technologies no one else
23 understood, or even knew existed; and spent more than a decade making promise after promise
24 about the utility, safety, and benefit of their products.

25 63. However, and as admitted in 2017 by Facebook’s first founding president, Sean
26 Parker (in an interview that got curiously little notice), he, Zuckerberg, and the other founding bros
27 of social media “designed these products to “consume as much of your time and conscious attention
28 as possible ... And that means that we need to sort of give you a little dopamine hit every once in a

1 while ...”¹³ Parker admitted that they set out to exploit “vulnerability[ies] in human psychology,”
2 that they did so knowing the risk that it might be harmful “to our children’s brains” and that even
3 though all of them “... understood this consciously ... we did it anyway.”¹⁴

4 64. Meta product development decks literally include photographs of brains, created by
5 neuroscientists and others Meta hires to work on product development. The following illustration
6 is just one example, in which Meta examines the brain development process throughout childhood,
7 identifying how this makes children “very vulnerable” – then examines various design-level changes
8 Meta might make to better capture the attention of young minds.¹⁵



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16 65. These allegations and more are evidenced in the Meta documents that have made
17 their way into the public record over the last two years.¹⁶

18 C. FACTUAL ALLEGATIONS AS TO SNAP

19 66. Plaintiffs hereby incorporate and adopt Section IV.C (and all applicable subsections)
20 of the Master Complaint as though set forth in full herein.
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23 ¹³ Mike Allen, *Sean Parker Unloads on Facebook: “God only knows what it’s doing to our children’s brains,”* AXIOS
(Nov. 9, 2017), <https://www.axios.com/2017/12/15/sean-parker-unloads-on-facebook-god-only-knows-what-its-doing-to-our-childrens-brains-1513306792>.

24 ¹⁴ *Id.* This is the same addiction mechanism as tobacco. *See Nicotine: It’s why smoking is so addictive*, Health and
25 Social Services, Government of Northwest Territories of Canada, <https://www.hss.gov.nt.ca/en/services/health-effects-tobacco/nicotine-it%E2%80%99s-why-smoking-so-addictive> (“Nicotine causes the release of dopamine in the
26 brain, which gives people a good feeling.”). Only, whereas Big Tobacco targeted adults and young adults, Meta
targeted teens and tweens.

27 ¹⁵ *See Why Teens and Young Adults Choose Insta*, available at https://www.documentcloud.org/documents/23322855-copy-of-copy-of-why-teens-and-young-adults-choose-insta_sanitized (last accessed Oct. 8, 2024).

28 ¹⁶ *See, e.g.*, <https://gizmodo.com/facebook-papers-how-to-read-1848702919>;
<https://www.documentcloud.org/projects/facebook-papers-210748/>; fbarchive.org.

1 67. Snap’s founders, Evan Spiegel, Reggie Brown, and Bobby Murphy, sought to create
2 a platform that could be used to facilitate the types of conversations and activities that people would
3 not want to exist in digital perpetuity. The concept for Snapchat arose from a 2010 incident in which
4 one of Snap’s founders, Reggie Brown, sent a photo that came back to haunt him.

5 68. The celebrated origin stories of Snapchat, while easily dismissed as college hijinks,
6 illustrate how central the transmission of illicit and illegal activity was to the product at inception.
7 In fact, the desire to avoid evidence of illicit and illegal activities was a design imperative to
8 Snapchat’s creators. For example, as an officer of Kappa Sigma fraternity at Stanford in 2009 and
9 2010, using traditional email and social media, Mr. Spiegel discussed “making 300 Jell-O shots to
10 get sorority girls drunk, urinating on one conquest and shopping for cocaine and marijuana.”¹⁷

11 69. Plaintiffs agree that the youthful indiscretions and college hijinks of corporate
12 leaders and government officials generally are beyond the legitimate scope of civil litigation or
13 politics. However, Mr. Spiegel’s communications promoting the purchase of cocaine, marijuana,
14 and alcohol to ply upon minors occurred at the same time he was designing the Snapchat product.

15 70. On information and belief, a motivation for Snapchat’s disappearing feature – not
16 just disappearing as between users but either not created or deconstructed on the back end as well –
17 was to facilitate such activity and provide cover for those engaged in illicit and illegal conduct.
18 After its launch in 2011, one of Snapchat’s founders proposed targeting it to mature audiences for
19 its intended purpose – as a sexting tool. A draft of a press release written in 2011 reads, “Picaboo
20 lets you and your boyfriend send photos for peeks and not keeps!”¹⁸

21 71. Despite this intent and foreseeability of how Snapchat could and would be misused,

23 ¹⁷ Andrea Chang, *Snapchat CEO Evan Spiegel ‘mortified’ by leaked frat emails*, L.A. TIMES (May 28, 2014, 12:55
PM), <https://www.latimes.com/business/technology/la-fi-tn-snapchat-evan-spiegel-20140528-story.html>.

24 ¹⁸ J.J. Colao, *The Inside Story of Snapchat: The World’s Hottest App Or A \$3 Billion Disappearing Act?*, FORBES (Jan.
6, 2014, 8:00 AM), <https://www.forbes.com/sites/jjcolao/2014/01/06/the-inside-story-of-snapchat-the-worlds-hottest-app-or-a-3-billion-disappearing-act/?sh=3c52f29467d2>. See also Nick Bilton, *Disruptions: Indiscreet Photos, Glimpsed Then Gone*, N.Y. TIMES (May 6, 2012, 5:24 PM),
25 https://archive.nytimes.com/bits.blogs.nytimes.com/2012/05/06/disruptions-indiscreet-photos-glimpsed-then-gone/?_r=0 (“The app’s description in the Apple App Store does not mention sexting. But the accompanying images
26 are of scantily clad women, and Apple has designated the app as being for users 12 and older, warning of ‘mild sexual
27 content or nudity.’ Mentions of the app on Twitter indicate that many young people use it for photo-based banter with
28 friends, though there are references to its less innocent potential.”).

1 Snap’s founders decided to target and market it children and teens.¹⁹ Snap’s founders did not decide
2 this because they believed that their product was in any way appropriate or safe for children and
3 teens; but rather, because it was a path to riches in an industry dominated by only one or two other
4 social media products at the time. Snap had to do something big and different to succeed.

5 72. Snap has worked hard to maintain the kid-friendly image that makes it so popular
6 among children, lulling consumers and parents into a false sense of security. In the words of one
7 Internet Crimes Against Children (ICAC) detective,

8
9 In my experience, Snapchat is by far the most popular online
10 platform when it comes to criminal misconduct and kids. It is easy
11 to download and appears harmless to many parents who see the
12 application on their children’s devices and have no idea how
dangerous it is. The parents to whom I have spoken generally
associate Snapchat with silly filters and kids being able to connect
with friends, and not with things like encrypted messaging and
strangers.²⁰

13 73. Likewise, Snap’s failure, inability, and/or or refusal to cooperate with law
14 enforcement and failure, inability, and/or refusal to utilize information in its possession to enforce
15 its own Terms of Use has resulted in incredible harms to children across the world. In the words of
16 one former Drug Enforcement Agency (DEA) Assistant Special Agent in Charge,

17 Snap has a tip line where anyone can submit complaints about
18 harmful content such as child pornography, human trafficking, or
19 bullying in order to have Snap either deactivate or suspend an
20 account if it is found to violate their policies. But then the account
will quickly reconstitute, often using the exact same pictures and a
similar name. I can’t tell you how many times I have seen this.²¹

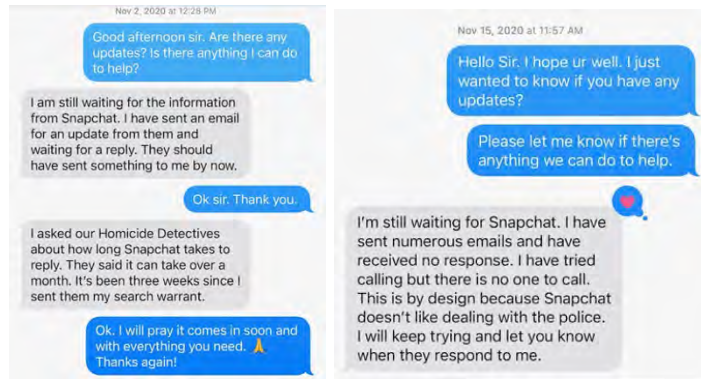
21 74. In another case, a police officer exchanged the following texts with a grieving mother
22 whose son died in September 2020 as the result of connections Snapchat made, “I have tried calling
23 but there is no one to call. This is by design because Snapchat doesn’t like dealing with police.”²²
24
25

26 ¹⁹ See Colao, *supra* note 18 (explaining that by Fall of 2011, Snap’s founders noticed that its userbase were school-
aged kids who used the app primarily between the school hours of 9:00 a.m. and 3:00 p.m.).

27 ²⁰ Declaration of Investigator Claude Dobbs, ¶ 3, filed October 5, 2023, in *Neville et. al. v. Snap, Inc.* (L.A. Sup. Ct.),
Case No. 22STCV33500 (“*Neville et. al. v. Snap*”).

28 ²¹ Declaration of Donald Im, ¶ 25, filed October 5, 2023, in *Neville et. al. v. Snap*.

²² Declaration of Perla Mendoza, ¶ 7, filed October 5, 2023, in *Neville et. al. v. Snap*.



75. These are just a few of many, many examples.²³

76. In truth, Snap ensures that there is no real way for parents to even learn what Snap is doing – what products it is distributing to their children, how it has designed and programmed those products to target and addict children, or the fact that Snap is the one facilitating, encouraging, and making connections between young users and adult strangers.

77. Snap may *look* different from some social media products. For example, it does not utilize a publicly viewable bulletin board format like Instagram or Facebook. However, Snap’s use of this visual difference between products to claim that Snapchat is safer than Instagram and Facebook when, in fact, Snap actively is connecting children to predatory Snapchat users to increase its own engagement, is unfair, deceptive, false, and misleading.

D. FACTUAL ALLEGATIONS AS TO TIKTOK

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

79. TikTok is a social media product designed to be used by children and actively marketed to children across the world. Its commercials, featured both on television and the internet, feature things like families dancing and dogs jumping in the air.

80. TikTok does not, however, design its product to be safe for children and/or free from dangerous defects.

81. On December 14, 2022, the Center for Countering Digital Hate (CCDH) published a report titled “Deadly by Design,” which illustrates how “TikTok pushes harmful content promoting

²³ See, e.g., *Neville et. al. v. Snap*, SAC, filed July 21, 2023.

1 eating disorders and self-harm into users' feeds."

2 82. TikTok's defects are not about third-party content, but rather, design and
3 programming decisions. TikTok is targeting and inundating minors with content meant to addict
4 them to its product, at the expense of their health and well-being. TikTok could make its product
5 safer for those consumers without ever removing a single piece of content.

6 83. On information and belief, companies like TikTok and Google know when
7 dangerous challenges are being amplified and targeted at children as direct result of their design,
8 programming, and operational decisions. Such knowledge, control, and contribution are just one
9 major difference between the products at issue and these lawsuits, developed starting in the first
10 decade of the 21st-century, and the types of products and online services that existed prior.

11 84. For example, and on information and belief, when these companies become aware
12 of such dangerous challenges, they will engage in detailed internal discussions. They recognize that
13 challenges can result in harm to children, including death, yet make decisions in terms of how to
14 react and/or respond to such harms that disregard such safety considerations – for example, on
15 information and belief, choosing to wait and see and/or be reactive rather than proactive even when
16 they know that such decision may result in the death of children.

17 85. Similarly, on information and belief, companies like TikTok exercise so much power
18 and control over what consumers see and think, that when confronted these kinds of real-world
19 harms occurring on and because of their platform-related decisions, instead of addressing them head
20 on, they consider strategies like convincing the world that the death of children resulting from use
21 of their platforms is a hoax. They know or have reason to know that this is not the truth, but once
22 again, prioritize their own business interests over child safety.

23 86. On October 26, 2021, for example, TikTok VP and Head of Public Policy at
24 Americas, Michael Beckerman, testified before the Senate Commerce, Science, and Transportation
25 Subcommittee that "As it relates to TikTok, this is not content that we've been able to find on our
26 platform ... actually, the content does not exist on the platform ... we have not been able to find any
27 evidence of a blackout challenge on TikTok at all. And again, it would violate our guidelines." On
28 information and belief, TikTok later had to correct and/or qualify that statement as TikTok is and

1 was aware of the blackout challenge having been on TikTok.

2 87. Of course, all of this should be viewed in light of the fact that another of these
3 Defendants, Meta, has argued in multiple lawsuits across the country that these companies have a
4 First Amendment right to lie to Congress. *See, e.g., State of Vermont v. Meta Platforms, Inc., et al.*,
5 Case No. 23-CV-4453, Ruling on Motion to Dismiss, dated January 19, 2024 (“There is a separate
6 claim here that Meta’s alleged lies in testimony before Congress constitute actionable
7 misrepresentations under the Consumer Protection Act. Meta argues that these are protected by the
8 First Amendment right to petition the government.”). They do not; but if governments do not act
9 and ensure and enforce reasonable regulations, they will continue to do so.

10 88. TikTok knows that its algorithms are promoting and amplifying harmful content to
11 children and teens and are operating with a degree of algorithmic discrimination that is particularly
12 harmful to TikTok’s most vulnerable user groups – our children

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

14 89. Plaintiffs hereby incorporate and adopt Section IV.E (and all applicable subsections)
15 of the Master Complaint as though set forth in full herein.

16 90. Plaintiffs further allege that YouTube radicalizes its users. YouTube’s advertising-
17 powered business model is geared towards user engagement, which is maximized by triggering
18 users’ preexisting biases in video recommendations. YouTube’s recommendation algorithm is
19 designed to optimize user activity and engagement on the platform by personalizing
20 recommendations based on users’ past exposures and content viewed or shared by other similar
21 users. However, in the case of political content, YouTube’s algorithmic recommendations reinforce
22 users’ political biases, ultimately leading to radicalization.

23 91. Users with certain beliefs tend to interact with social media content that is consistent
24 with those beliefs. Users are more likely to select content that aligns with their preexisting beliefs
25 than otherwise. This tendency may polarize people’s attitudes and generate hostility toward different
26 racial, ethnic, religious groups, and social and political ideologies.

27 92. In 2022, ADL’s Center for Technology & Society conducted a nationally
28 representative survey of YouTube users measuring demographic characteristics and political

1 attitudes such as age, race, education, partisanship, ideology, political knowledge, and interest.²⁴ In
2 addition to survey data, the study monitored participants' browser history and activity data.

3 93. Using comprehensive individual-level behavioral data, ADL found that exposure to
4 alternative YouTube channels can serve as gateways to extremist or white supremacist channels,
5 which are disturbingly common among a group of Americans.

6 94. ADL found that exposure to videos from extremist or white supremacist channels on
7 YouTube was very common. Approximately one in ten participants viewed at least one video from
8 an extremist channel (9.2%) and approximately two in ten (22.1%) viewed at least one video from
9 an alternative channel. When participants watched extreme videos, they were more likely to see and
10 follow recommendations to similar extremist videos. A third (29%) of YouTube recommendations
11 accompanying videos from extremist channels were to other videos of the same type.

12 95. As a result, many racially resentful people are not only watching large numbers of
13 videos from alternative or extremist channels but also are shown recommendations for more such
14 videos when they do so, furthering their progression to extremism.

15 96. ADL's findings demonstrate that YouTube plays an important role in exposing
16 people to extremist content.

17 97. ADL's survey-based determination that YouTube radicalizes right-leaning users is
18 consistent with computer science research at the University of California Davis. Researchers there
19 conducted a systematic audit of YouTube's recommendation system using a 100,000 proxy accounts
20 with different ideological profiles to determine the presence of ideological bias and radicalization
21 in which recommendations progressively more extreme.²⁵ Researchers reviewed 15,323,930
22 YouTube videos spanning 111,715 unique channels, and they found that YouTube's
23 recommendations do in fact direct users – especially right-leaning users – to ideologically biased
24 and increasingly radical content on both homepages and in up-next recommendations.

25 98. The UC Davis researchers found that YouTube's homepage recommendation
26

27 ²⁴ Annie Y. Chen et al., *Exposure to Alternative & Extremist Content on YouTube*, ADL (2022).

28 ²⁵ Muhammad Haroon et al., *YouTube, The Great Radicalizer? Auditing and Mitigating Ideological Biases in YouTube Recommendations* arXiv:2203.10666v2 [cs.CY] 25 Mar 2022.

1 provided viewers with right leaning profiles more right-leaning recommendations than centrist
2 viewers received centrist recommendations. This demonstrates that the recommendations for the
3 right leaning viewer are not only significantly different from the center baseline but are even more
4 ideologically biased than the recommendations of the other viewers.

5 99. Similar radicalization tendencies were found in YouTube's Up Next
6 Recommendations. Researchers found increased ideological bias in the up-next recommendation
7 trials compared to the homepage. The prior ideological bias of the You Tube user influences
8 influence their up-next recommendations which increases the chances that the user will continue
9 watching ideologically biased content.

10 100. The Davis researchers demonstrating that over time YouTube's algorithms direct
11 users to progressively more ideologically radical and extreme videos in their YouTube sessions.

12 101. Since YouTube's inception Google has failed to adequately warn young users or their
13 parents about the mental and physical risks its products pose.

14 102. These risks include, but are not limited to, product abuse and addiction and
15 radicalizing exposure to racism, antisemitism, violence, and other harms.

16 **F. FACTUAL ALLEGATIONS AS TO DISCORD**

17 103. Discord is an on-line social media product that was launched in 2015. The product
18 includes a number of features that allow users to set up accounts and communicate with other
19 product users through group and private means, including video calls, text messaging, and exchange
20 of photos and videos. <https://en.wikipedia.org/wiki/Discord>.

21 104. Discord's product design promotes harmful dependencies and radicalization.

22 105. Discord's users engage in public and private chats or channels, called servers, on
23 varying topics. The vast majority are private, invite-only spaces with fewer than 10 people. All
24 servers are private by default, and only channels with more than 200 members are discoverable in
25 its search tool. Discord utilizes real time notifications and other features designed to make it difficult
26 for vulnerable consumers to look away.

27 106. Discord's users engage in public and private chats or channels, called servers, on
28 varying topics. The vast majority are private, invite-only spaces with fewer than 10 people. All

1 servers are private by default, and only channels with more than 200 members are discoverable in
2 its search tool.

3 107. Teens on Discord can connect with people they don't know if the stranger was invited
4 by someone else in the room or if the channel link is dropped into a public group that the user
5 accessed. By default, all users – including teens – can receive friend invitations from anyone in the
6 same server, which then opens up the ability for them to send private messages.

7 108. Discord in particular is popular for communities of neo-Nazis and white
8 supremacists to socialize, share hateful memes, boost the ideas that undergird their movements,
9 inculcate strangers, and plan activities that take place elsewhere online.

10 109. BuzzFeed News reported on a chat server called “/pol/Nation” where more than
11 3,000 users participate in a rolling multimedia chat extravaganza of Hitler memes, white nationalist
12 revisionist history, and computer game strategy.²⁶ In a voice-over-IP chatroom within the server,
13 users keep up a steady chatter about the same subjects. A separate server called “Thunderdome”
14 hosts the enthusiastic staff and fans of the Daily Stormer, a neo-Nazi website.

15 110. Slate was able to join more than 20 communities on Discord in a single afternoon
16 that were either directly about Nazism or white supremacy or reveled in sharing anti-Semitic and
17 racist memes and imagery.²⁷

18 111. Slate noted that Discord differs from other social media platforms in that chats are
19 entirely opt-in, meaning that the potential for unsolicited public harassment is significantly lower.
20 Slate concluded that this design feature, in addition to the anonymity in Discord's design, makes it
21 an ideal recruitment tool for white supremacists to attract followers to their racist ranks.

22 Unlike Stormfront—where people who are obviously interested in hate groups
23 go—on Discord a lot of the participation comes from people who are mostly hoping
24 to find an abasing joke or chat about violent video games safely without fear of
25 offending someone. And that makes Discord an ideal place for far-right
26 recruitment. Its spaces provide room for people to socialize in hate—to forge
connections from which social beliefs can grow. If you hang out with Nazis and
racists long enough, what begins as cruel humor can give way to a set of
convictions, one that doesn't need to be approached with a layer of irony.

27 ²⁶ Joseph Bernstein, *A Thriving Chat Startup Braces For The Alt-Right*, BuzzFeed NEWS (Jan. 23, 2017).

28 ²⁷ April Glasser, *White Supremacists Still Have a Safe Space Online*, SLATE (Oct. 9, 2018).

1
2 112. On August 18, 2017, more than 500 white supremacists, Klansmen, neo-Nazis, and
3 members of the alt-right participated in the “Unite the Right” rally in Charlottesville, Virginia.
4 Motivated by replacement theory, the group chanted “Jews will not replace us” and carried weapons,
5 Confederate battle flags, and Nazi and neo-Nazi symbols. In the afternoon, self-identified white
6 supremacist James Alex Fields Jr. drove into a crowd of counter-protesters.

7 113. Because the Unite the Right rally promoted a message of racism and anti-Semitism,
8 the leaders didn’t do the bulk of their logistical planning in any kind of public forum or open
9 Facebook group; instead, they used Discord.

10 114. Discord similarly facilitated the radicalization of Payton Gendron, the shooter that
11 murder ten Black citizens and wounded three others at Tops Friendly Market in Buffalo, New York
12 on May 14, 2022. *See Patterson et. al. v. Meta Platforms, Inc., et. al.*, N.Y. Supreme Court, Index
13 No. 805896/2023 (filed May 12, 2023). Gendron used Discord to keep a private journal for months
14 where he wrote down his hateful beliefs and developed specific plans for equipping himself and
15 perpetrating his massacre.²⁸ He kept a diary on a personal server and restricted it, as per available
16 Discord settings, so that he was the only person who could view it.

17 115. Gendron’s diary contained approximately 700 pages of original posts written by him,
18 links to outside content, and memes.²⁹ He outlined details he was considering for his attack, and his
19 Discord diary included raciest charts, graphs, and memes, which Gendron believed as proof of white
20 genocide. Gendron’s Discord logs reflect months of research he conducted on body armor, helmets,
21 and rifles in order to “kill as many blacks as possible” and “avoid dying.”³⁰

22 116. Between August 1, 2020 and January 1, 2021, he posted at least 83 messages on the
23 channel “#bag-general.”³¹

24 ²⁸ OFFICE OF THE N.Y. STATE ATTORNEY GENERAL LETITIA JAMES, INVESTIGATIVE REPORT ON
25 THE ROLES OF ONLINE PLATFORMS IN THE TRAGIC MASS SHOOTING IN BUFFALO ON MAY 14, 2022
at 3 (Oct. 18, 2022), available at <https://ag.ny.gov/sites/default/files/buffaloshooting-onlineplatformsreport.pdf>
(hereinafter “Attorney General Report”).

26 ²⁹ *Id.* at 21.

³⁰ Attorney General Report, *supra* note 30, at 28.

27 ³¹ Dan Feidt, *Buffalo Mass Shooter Likely Sought Combat Gear Advice on Online Chats*, UNICORN RIOT (May 14,
28 2022), <https://unicornriot.ninja/2022/buffalo-mass-shooter-likely-sought-combat-gear-advice-on-online-chats/>.

1 117. In theory, Discord’s terms of use prohibit users under 13.

2 118. However, Discord does not verify user age or identity. Moreover, Discord has long
3 been on notice that children 13 and younger use the product—and that adults preying on children
4 do too.³² Discord is aware, and it is commonly known and understood that nobody follows that
5 rule, and that Discord allows children 13 and younger to use its social media product. Children as
6 young as eight years old currently are using the Discord social media product. See Kellen Browning,
7 5 Ways Young People Are Using Discord, N.Y. Times, Dec. 29, 2021.

8 119. Discord could enforce its supposed policy of prohibiting children 13 or younger if it
9 wanted to do so. Among other things, minor users often state their real age in their bio and/or tell
10 other users their real age in group and private chats using one or more Discord product features.
11 Likewise, minor users post photos that often reflect their actual age.

12 120. Discord’s product features also create an unreasonable opportunity for and risk of
13 sexual exploitation of kids. By default, all product users—including users under 18—can receive
14 friend invitations from anyone in the same server, which opens the ability for them to send and
15 receive private messages from strangers.³³

16 121. Minor users lack the cognitive ability and life experience to identify online grooming
17 behavior by prurient adults and the psychosocial maturity to decline invitations to exchange
18 salacious material and mass-messaging capabilities. At all times relevant, Discord allowed direct
19 messaging with and by minors without parental notification.

20 122. Discord has designed and operates its product in such a way that it also allows people
21 to chat using fake names and the task of enforcing community standards is largely delegated to the
22 organizers of individual Discord “servers.”³⁴ “Server” is the used to describe a key feature of the
23 Discord product that allow users (including, as described above, underage users) to connect,

24
25 ³² See, e.g., Nellie Bowles and Michael Keller, *Video Games and Online Chats Are ‘Hunting Grounds’ for Sexual Predators*, N.Y. Times, Dec. 7, 2019, available at <https://www.nytimes.com/interactive/2019/12/07/us/video-games-child-sex-abuse.html>.

26 ³³ Samantha Murphy Kelly, *The dark side of Discord for teens*, CNN Business, Mar. 22, 2022, <https://www.cnn.com/2022/03/22/tech/discord-teens/index.html>.

27 ³⁴ Kellen Browning, *How Discord, Born From an Obscure Game, Became a Social Hub for Young People*, N.Y. Times, Dec. 29, 2021, available at <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

1 exchange photo and video files, and user Discord’s audio and video communication features.

2 123. The Discord product generates revenue for Discord through subscription fees that
3 gives users access to features like custom emojis for \$5 or \$10 per month. Discord also began
4 experimenting in December 2021 with a new feature that allow some users to charge for access to
5 their server, up to \$100 a month, of which the company takes a 10 percent cut.³⁵

6 124. Discord is well aware that users can and do use Discord in ways that pose risks of
7 harm, abuse and exploitation, including using Discord to initiate and engage in explicit sexual
8 conduct. Discord creates false assurances that users (including minor users) can turn on feature to
9 “keep [them] safe.” On information and belief, at times relevant, the Discord support page
10 represented its “Safe Direct Messaging” feature as follows:

11 Keep me safe: The safest option. This will have Discord scan any image sent in all
12 DMs, regardless of whether you’ve added the user on your friend list, or the user is
DMing you just by sharing a mutual server.

13 My friends are nice: The medium-est option! This will let Discord know to scan
14 any images sent in DMs from users that aren’t on your friends list, but also to trust
your previously-added friends and not worry about any images they send.

15 Do not scan: The self-confident option. Enabling this option will completely disable
16 Discord’s image scanning process, and leave you for a walk on the wild side for
any and all DMs you receive. Careful, it’s a jungle out there!³⁶

17 The representations that Discord will “scan” images and provide “Safe Messaging!” reasonably
18 would lead minor users to believe that Discord will scan for and block sexually explicit materials,
19 including materials used to groom and/or blackmail users, and otherwise “keep [the user] safe.”

20 125. As a threshold matter, Discord’s direct messaging and “Safe Direct Messaging”
21 product features are inherently defective and/or dangerous for minor users because Discord should
22 not be presenting less-safe product options (“My friends are nice” and “Do not scan”) to users under
23 18 without their parents’ knowledge and consent.

24 126. Moreover, Discord downplays the serious dangers its product presents to minor users
25

26
27 ³⁵ Kellen Browning, How Discord, Born From an Obscure Game, Became a Social Hub for Young People, N.Y. Times,
Dec. 29, 2021, available at <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

28 ³⁶ Discord Safety: Safe Messaging!, <https://support.discord.com/hc/en-us/articles/115000068672-Discord-Safety-Safe-Messaging->

1 by “jokingly” referring to unsolicited sexual overtures, grooming, displays of explicit sexual
2 materials, abuse, exploitation, and blackmail as “the wild side” and “a jungle.” Presenting these less-
3 safe options to minors and without verification of parental consent (for minor users) is a product
4 defect and/or inherently dangerous because Discord is attempting to contract with minors without
5 warning to minor parents and in a manner that poses significant risk to a significant number of its
6 minor users.

7 127. Discord’s Safe Direct Messaging product also is defective and/or does not operate as
8 promised and as reasonably understood by Discord’s minor users. This product does not operate as
9 promised and as reasonably understood by Discord’s minor users and creates a false sense of safety
10 that results in direct harm to a significant number of Discord’s minor users.

11 128. A reasonable person reviewing Discord’s description of its “Safe Direct Messaging”
12 feature reasonably would understand that Discord was representing it would keep them “safe” from
13 harmful interactions and predatory users, including by monitoring and saving conversations had via
14 Discord’s social media product and as long as the user selects the “Keep me safe” option. Discord’s
15 product feature does nothing of the sort, however. On information and belief, at best, Discord scans
16 image files for malware and similar issues. As such, users (especially minor users) are lulled into a
17 false and dangerous sense of security while using the product.

18 129. Discord’s platform is defective as its “Safe Direct Messaging” feature does not
19 actually keep minor Discord users safe and is deceptive and misleading and inherently dangerous
20 for minor Discord users because it creates a false sense of security and encourages them to use the
21 Discord product under the false belief that it is safe for children.

22 130. Discord’s platform also is defective and unreasonably unsafe for minor users because
23 it has no effective parental controls. Children are able to and do routinely use Discord despite being
24 13 or younger and despite having no parental consent to use the product, let alone to be placed at
25 risk of trauma, abuse, and exploitation through use of the product exactly in the manner and for the
26 purpose for which Discord designed the product.

27 131. Discord’s platform also is defective for failure to provide any effective warnings to
28 minor users, let alone their guardians, of the known risk of harm from the abuse and sexual

1 exploitation when children use the product.

2 132. Discord’s platform also is defective for failure to provide guardians with any means
3 to effectively report or otherwise stop Discord from providing their minor children with access to
4 its platform.

5 **G. FACTUAL ALLEGATIONS AS TO ROBLOX**

6 133. Roblox owns, promotes, distributes and operates Roblox. Roblox was launched in
7 2006 and is a product described by Roblox as “a human co-experience platform.”

8 134. The Roblox product includes multiple features designed to result in dependency, for
9 example, compulsion loops, endless gameplay, reward systems, and in-game purchases. Roblox
10 uses elements like variable reward systems and microtransactions to reinforce addictive behavior
11 patterns, similar to gambling except that Roblox utilizes these features on vulnerable children

12 135. The Roblox product also includes features that allow users to “interact with each
13 other to explore and develop immersive, user generated, 3D experiences”, including “experiences”
14 that take the form of games created by users (anything from a simulation of running a virtual
15 restaurant to adopting a pet).

16 136. The Roblox product is marketed to and designed to appeal to children, primarily
17 children under the age of 13. For example, the overall look and feel of Roblox—described as
18 “roughly hewn, blocky aesthetics and ugly text”—is “off-putting to adults.”³⁷ But the style of
19 Roblox and its “game” features are appealing to young children. Indeed, “children loved the fact
20 Roblox offered access to an endless stream of new and free experiences—a kind of YouTube for
21 video games.”³⁸

22 137. Roblox is one of the most popular online products among American teens and
23 children. “A December 2017 study by Comscore reported that kids between the ages of 5 and 9
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25 ³⁷ Simon Parkin, *The trouble with Roblox, the video game empire built on child labour*, The Guardian, Jan. 9, 2022,
26 available at [https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-](https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour)
27 [on-child-labour](https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour) (“Roblox was built as a playful method of teaching children the rudiments of game-making”).

28 ³⁸ Simon Parkin, *The trouble with Roblox, the video game empire built on child labour*, The Guardian, Jan. 9, 2022,
available at [https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-](https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour)
[on-child-labour](https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour) (“Roblox was built as a playful method of teaching children the rudiments of game-making”).

1 spend more time using the Roblox product than doing anything else online on PCs. For those
2 between the ages of 9 and 18, only YouTube consumes more of their online attention.³⁹ As of 2020,
3 about 75% of American children ages 9 through 12” regularly uses Roblox, according to the
4 company.⁴⁰ During the pandemic, kids’ use of Roblox escalated. Indeed, by July 2020, users spent
5 3 billion hours on Roblox, twice as much time as in February 2020.”⁴¹

6 138. Roblox also marketed its product as educational and encouraged integration of its
7 product into several kid-focused organizations and activities. For example, “Schools, camps, Girl
8 Scout troops and many other organizations use Roblox to teach kids coding. And it has become a
9 quasi-social-network for children.”⁴²

10 139. Roblox generates the bulk of its revenue by selling its users in-game currency, called
11 “Robux,” which users can then spend on virtual items for their avatars.⁴³ Roblox reports that only
12 a small portion of users purchase Robux. On information and belief, at least some number of such
13 users are adults who use Robux to entice and exploit child users.

14 140. Because Robux sales are key to the product’s revenue, Roblox was disincentivized
15 to alter the product design and operation to prevent dangerous, exploitative and injurious adult-child
16 interactions using the Roblox product. Indeed, Roblox reported in its recent Form 10-Q that it relies
17 on developers to develop product offerings that encourage use of the Robux feature.⁴⁴

18 141. For example, Roblox represents that it uses advanced technologies to, “identify
19 problematic language, potential bypasses to our chat filters, and content that falls outside our
20 policies” and “review and monitor communications that flow through Roblox to block and protect

22 ³⁹ See, e.g., Burt Helm, *Sex, lies, and video games: Inside Roblox’s war on porn*, Fast Company, Aug. 19, 2020, available
23 at <https://www.fastcompany.com/90539906/sex-lies-and-video-games-inside-roblox-war-on-porn>;
<https://www.businessofapps.com/data/roblox-statistics/> (“Roblox highest demographic is children under 13 and it was
the most popular entertainment app for that age group”).

24 ⁴⁰ Shannon Liao, *How Roblox became the ‘it’ game for tweens—and a massive business*, CNN Business, Oct. 29,
2020, <https://www.cnn.com/2020/10/27/tech/roblox-explainer/index.html>

25 ⁴¹ Shannon Liao, *How Roblox became the ‘it’ game for tweens—and a massive business*, CNN Business, Oct. 29,
2020, <https://www.cnn.com/2020/10/27/tech/roblox-explainer/index.html>

26 ⁴² *Id.*

⁴³ See Roblox Corporation, Form 10-Q, March 31, 2022, available at <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ea0f0408-7ea4-48f8-a127-fef1fdb69aa3.pdf>, at 59.

27 ⁴⁴ See Roblox Corporation, Form 10-Q, March 31, 2022, available at <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ea0f0408-7ea4-48f8-a127-fef1fdb69aa3.pdf>, at 15.

1 users from inappropriate behavior, such as questions about personal information and instructions on
2 how to connect on less protective third-party chat applications.”⁴⁵

3 142. Roblox also represents that the “The algorithms in our chat filters are age-sensitive:
4 they monitor both what users can say and see based on their ages.”⁴⁶

5 143. Roblox CEO and Co-Founder, David Baszucki has made public assurances that
6 safety allegedly lies at the core of everything the company has built. It was, he said, “what
7 everything rests on,” and he who monitor use of the product and manually check anything activity
8 flagged as inappropriate and escalate incidents of suspected grooming.”⁴⁷

9 144. Baszucki also has touted Roblox’s “stringent safety system,” calling it “one of the
10 most rigorous of any platform, going well beyond regulatory requirements.”⁴⁸

11 145. Notably, however, Roblox’s director of community safety and digital civility is
12 reported as having stated that “You can’t retrofit safety,” indicating that Roblox was aware of the
13 dangers of its product and the harm it already had caused.”⁴⁹

14 146. Roblox also touts the fact that it employs hundreds of “moderators” globally to
15 actively review and address harmful and/or inappropriate content, for the specific purpose of
16 keeping its underage users safe. For example, in 2020. Roblox reported that it has “a team of 1,600
17 moderators who monitor the platform for inappropriate content and conduct safety reviews of all
18 images, audio and video files using humans and machine scanning.”⁵⁰ Likewise, in November 2021,
19 Roblox CEO and Co-Founder, David Baszucki, represented that Roblox employs more than 2,000
20 moderators around the world.”⁵¹

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22 ⁴⁵ See Roblox Corporation, Form 10-K, for the fiscal year ended December 31, 2022, available at
<https://www.sec.gov/Archives/edgar/data/1315098/000131509823000035/rblx-20221231.htm>, at 59.

23 ⁴⁶ Roblox Corporation 2021 Annual Report and 2022 Proxy Statement, May 26, 2022, available at
[https://s27.q4cdn.com/984876518/files/doc_financials/2021/ar/Roblox_Proxy-and-Annual-Report_Web-Ready_Bookmarked-\(1\).pdf](https://s27.q4cdn.com/984876518/files/doc_financials/2021/ar/Roblox_Proxy-and-Annual-Report_Web-Ready_Bookmarked-(1).pdf), at 16 (pdf page 83).

24 ⁴⁷ Simon Parkin, *The trouble with Roblox, the video game empire built on child labour*, The Guardian, Jan. 9, 2022,
25 available at <https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour>

26 ⁴⁸ *Id.*

⁴⁹ *Id.*

27 ⁵⁰ Shannon Liao, *How Roblox became the ‘it’ game for tweens—and a massive business*, CNN Business, Oct. 29,
2020, <https://www.cnn.com/2020/10/27/tech/roblox-explainer/index.html>.

28 ⁵¹ Simon Parkin, *The trouble with Roblox, the video game empire built on child labour*, The Guardian, Jan. 9, 2022,

1 147. On information and belief, Roblox knew or should have known of certain defects
2 and/or inherently dangerous features in its Roblox product, which Roblox designed, promoted,
3 operated, and distributed to the mass, public market (targeting children), and which Roblox could
4 have designed, distributed, promoted and operated safely and in a responsible manner with a
5 reasonable investment of time and capital. Roblox chose not to use safer designs and policies and
6 chose not to provide robust, accurate warnings about the dangers its product posed to child users.
7 On information and belief, Roblox made those choices, at least in part, because it believed such
8 changes might curb the explosive growth in use of the product (by number of users, amount of time
9 users spent with the product, and level of engagement with the product) and also might curb
10 revenues generated for Roblox by the Roblox product.

11 148. At all times relevant, while Roblox was designed for, promoted for and to, and
12 distributed to children, Roblox also designed product features that provided adults with unfettered
13 and obviously dangerous access to children, such as the Roblox direct and/or instant messaging
14 (“direct messaging”) feature, as well as features that allow children to receive Robux currency from
15 complete strangers. At all times relevant, Roblox failed to take reasonable steps to protect the
16 children it targeted as its main product users and also failed to adequately warn parents and children
17 of the dangers of these product features.

18 149. In other words, in a product designed for, targeted at, and promoted as safe for
19 children, Roblox created and deployed product features that literally allow adult strangers to talk to
20 and connect with kids and offer them (virtual) money. And Roblox did so in the face of the known
21 risk—and known actual occurrence—of adults using the Roblox product to find and then exploit
22 child users—while those adult users also paid Roblox for Robux.⁵²

23 150. Minor users lack the cognitive ability and life experience to identify online grooming
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25 available at <https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour>.

26 ⁵² See, e.g., “Roblox: ‘I thought he was playing an innocent game,’” BBC, May 30, 2019, available at
27 <https://www.bbc.com/news/technology-48450604>; “The hidden dangers in Roblox,” KIDAS, May 26, 2021, available
28 at <https://getkidas.com/the-hidden-dangers-in-roblox/>; *The trouble with Roblox, the video game empire built on child labour*, The Guardian, Jan. 9, 2022, available at <https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour> (former Roblox moderator discussing grooming and harassment that occurred to her by adults she met on Roblox as a child).

1 behavior by prurient adults and the psychosocial maturity to decline invitations to exchange
2 salacious material and mass-messaging capabilities. At all times relevant, Roblox allowed direct
3 messaging with and by minors without parental notification.

4 151. At all times relevant, Roblox could have taken reasonable steps (with relatively
5 nominal investment of expense and time) to better protect their child users, for example, (a) not
6 allowing use of its direct messaging product between minor users and adult users (including
7 employing robust age verification mechanisms and/or preventing minor users from direct messaging
8 any users without verifiable parental consent), (b) not allowing adult users to initiate messaging with
9 minors or to message with minors at all, unless such contact is approved by the minor user's parent,
10 (c) by warning parents of the direct messaging product feature and of Roblox's failures to create the
11 safe environment it promised, (d) notifying parents every time their minor child engaged in direct
12 messaging with another user (particularly an adult user), and/or by providing a transcript of all direct
13 message to parents, (e) verifying age and identity (as well as parental approval) in order to block
14 access to child users by adult users unknown to them in real life, and (f) requiring identification and
15 contact information, as well as an exchange of emails, between users and minor user parents before
16 any contact is allowed.

17 152. Direct messaging and "Robux" features are not necessary to operation of the Roblox
18 product, nor to creation of a reasonably safe, "social" platform appropriate for children.

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1 **II. PLAINTIFF SPECIFIC FACTUAL ALLEGATIONS**

2 **A. Brehnan “Bear” Rysdam (September 8, 2009 – November 9, 2025)**



15 153. Plaintiff Kaira Rysdam, individually and as successor-in-interest to Brehnan “Bear”
16 Rysdam, asserts claims against the Meta, Snap, and Google Defendants in connection with
17 Facebook, Instagram, Snapchat, and YouTube.

18 154. Bear Lived in Hermiston, Oregon and died at the age of 16, as the result of harms
19 these Defendants and their defective and/or inherently dangerous products caused.

20 155. Bear was the kind of kid who loved to be home and loved to spend time with his
21 family but also made friends and family everywhere he went. He made everyone feel like his best
22 friend because of the way he treated people. Because of his kind heart and natural leadership. He
23 was the kid who always went out of his way to help other kids in need. He refereed for youth sports
24 and, from 2023 and until his death, Bear spent hundreds of volunteer hours putting in a lacrosse
25 field for kids in the community.

26 156. Bear’s parents would take Bear and his siblings to the local Giving Tree at Christmas
27 each year, and they each got \$100 to spend on others. One year, Bear found a heart and thought he
28 might know who the kid was. So he turned to his parents and asked them if they would return

1 whatever his biggest gift was that year and let him use that money for the Giving Tree instead. He
2 said he wanted to spend it on the kids who didn't have what he did.

3 157. His parents said okay, and they told him the amount. Bear spent that money on other
4 kids, believing it meant that his own Christmas gift would be returned. When Kaira later asked her
5 husband if they were really going to return Bear's gift, he said no. But that, as a parent, he wanted
6 Bear to believe that he would. He wanted to know that his children would put others before
7 themselves, even when it was difficult.

8 158. Bear grew up with engaged parents and an older brother and younger sister who
9 adored him.

10 159. His mother was a school principal, and his dad is a business owner. His parents tried
11 to read up on all the new apps that were popular with kids, and so that they could make fully
12 informed choices – which is what they believed they were doing.

13 160. They put parental controls in place, and they only allowed their children to use apps
14 they believe they “needed” for a legitimate purpose. For example, to communicate with friends,
15 school sports, and similar. This is why they said no TikTok, even though TikTok's advertising
16 made it seem like a generally safe app for kids – one focused on harmless challenges and dancing.

17 161. When Bear was about 12, he started watching YouTube. His parents can't be sure
18 exactly when YouTube first made its way into their home, and it just sort of appeared.

19 162. The app came pre-installed on devices and smart TVs and was a staple in Bear's
20 classrooms. Kaira's school used Google Classroom, and Kaira was familiar with Google's
21 advertisements across its suite of products. It advertised YouTube as safe and educational when
22 used at school, and as harmless as standard television channels when used at home – with the only
23 difference being one of convenience. Kids could pick that they wanted and did not have to sit
24 through boring commercials, which actually made YouTube seem a bit better than normal TV.

25 163. Bear's family also kept video games out of the home and did not have cable TV, so
26 YouTube was one of the few options when it came to screens – which Bear's family rarely used, or
27 so his parents believed.

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1 164. Bear enjoyed learning about welding and started off watching a lot of how to videos
2 on YouTube. He liked fixing things up and selling them too. And he used YouTube to watch sports.
3 It was affordable, while cable was not. Bear could watch Lacrosse National Championships and
4 college football games for free.

5 165. YouTube seemed safe in every regard, which is exactly what Google intended and
6 why it advertised and distributed it the way it did.

7 166. Bear was not a sneaky kid. To the best of his parents' knowledge, he waited to open
8 accounts until his parents said yes, and he typically just opted to use the same passwords his parents
9 used for his own accounts.

10 167. When Bear was 13, his parents said yes to Facebook and so that he could keep in
11 touch with family. That's how their family members sent photos, and Kaira believed that Facebook
12 was safe. In fact, Bear's parents were familiar with Facebook themselves, and it appeared to
13 function exactly how advertised by Meta. It seemed like a safe way to stay connected.

14 168. They were not aware of the addictive mechanisms Meta had built into its Facebook
15 platform and never felt as though their own Facebook use was harmful or out of control – which
16 they only now know may be because their frontal lobes were fully developed and they were not as
17 susceptible to those forms of manipulation and deception as their minor child was.

18 169. But also, Meta knew that Bear was a minor. When he opened his account, his mom
19 made sure that he input his correct birthdate. Meta even decided that Bear was too young to use its
20 Marketplace product ... yet had no issue addicting and exploiting him despite his age.

21 170. After Bear opened his first Facebook account, he complained that Facebook was for
22 old people. His mom thought this was funny, because she had the same impression of Facebook.
23 Bear asked if he could use Meta's Instagram product in addition to Facebook. His parents were
24 familiar with the prevalence of Instagram in schools and school sports and were familiar with Meta's
25 advertising for the platform which, at times, seemed to be everywhere. It was a commonly used
26 product in schools and was known based on Meta's representations and marketing campaigns
27 directed towards schools as being one of the safest apps for teens.

28 171. The App store also rated it as safe for kids as young as 12.

1 172. So his parents said yes, and Bear started using Instagram around age 14.

2 173. But then his parents learned that Bear had opened a FINSTA. FINSTA stands for
3 “fake Instagram” and refers to secret secondary accounts users open on Instagram. What his parents
4 did not know at the time was that Meta actually saw these secret, secondary accounts as valuable
5 tools to get kids to open more Meta accounts and, in turn, increase its engagement.

6 174. Bear’s parents believed he simply opened a second account to hide what he was
7 doing from his parents, which seemed like a typical teenager thing to do – but not one they wanted
8 Bear thinking was okay. They never imagined that Meta encouraged and even advertised to kids
9 their ability to subvert parental oversight via FINSTAs. This is predatory, and yet, Meta did it.

10 175. After learning that Bear had opened a FINSTA, his parents told him that Instagram
11 was no longer allowed; not until he could show them that he was able to follow the rules his parents
12 had put into place, as was their right to do. These were not oppressive rules. They were rules
13 designed to keep their vulnerable child safe.

14 176. They also took a look at his Reels feature and commentary at that time, and so that
15 they could see what Instagram was choosing for their son. It seemed fine. Nothing that jumped out
16 at them as age inappropriate. They had no reason to suspect that Instagram was addicting and
17 exploiting their child; just that he had broken a rule and was maybe too young for Instagram.

18 177. Bear was off Instagram for about a year. They got him a flip phone for that time and
19 allowed him to start using Instagram after he seemed to better understand why it was important for
20 him be open and honest about his Instagram use.

21 178. He understood that he was only allowed one account, and as far as his parents know,
22 he stuck to that this time around.

23 179. What Bear’s parents did not realize were the addiction related harms these products
24 – Facebook, Instagram, and YouTube – began causing their son starting shortly after his use started.
25 Bear was active in sports and kept his grades up. In retrospect, he was more tired than usual and
26 moodier than he had been in the past – even worse than after COVID started, when all kids were
27 struggling with feelings of boredom and isolation – but they chalked it up to growing up. It seemed
28 like a natural part of becoming a teen and young adult.

1 180. They had no reason to think that the products that had talked their way into the front
2 door of their home and into Bear's bedroom and pocket were the source of these subtle changes.

3 181. It was inconceivable, particularly as they continued to see advertisements and
4 commercials representing the safety of these products. Over and over, without exception. These
5 companies advertised in schools, to teachers and through respected organizations like the PTA and
6 Scholastic and swore that their products were safe and non-addictive.

7 182. Bear also asked for Snapchat during this period of time. He asked a lot, in fact, and
8 because he said that all of his friends had it. At first his parents said no. Bear said he felt left out.
9 He said that he was the only one on his lacrosse team that didn't have Snapchat. So at some point
10 they said "yes," but then Bear started to become disengaged, spent more time in his room, and
11 seemed moodier, so they changed their mind and took Snapchat away. They told him that he could
12 try again once he proved that he could engage responsibly. Again, and as far as his parents know,
13 Bear respected that decision.

14 183. Then, in September of 2025, Bear asked for Snapchat again.

15 184. He was 16 at the time, and it served a purpose.

16 185. Snapchat was the app all of the kids on the lacrosse team used to communicate,
17 especially during offseason. The coaches used a different app through the school, but the kids would
18 start their own chat on Snapchat to stay connected and meet up during the summer.

19 186. Then during the season, the kids would talk on Snapchat non-stop. Snaps before
20 games asking who would set the goals out, and Snaps after games with photos asking whose water
21 bottle had been forgotten at the field. It seemed safe and harmless. It was literally an app advertised
22 with silly filters and brightly colored cartoons.

23 187. On the last day in September 2025, Bear's dad – also one of his lacrosse coaches –
24 said yes because he believed Snap's representations about the safety of its app and believed that the
25 app was a safe way for the kids to stay connected. Snap advertised itself as being a way for people
26 who know each other in real life to stay connected; it didn't advertise its Quick Add feature, its
27 geolocations features, or the hidden data vault called My Eyes Only (which Bear's parents did not
28

1 know about and would never have been okay with if they had) and it didn't disclose that, in fact, it
2 addicts kids and connects predatory strangers to them by design.

3 188. When Bear started using Snapchat again, it was so that his dad could tell him what
4 the other kids needed to know before practice. It seemed safe. Then things began to change.

5 189. On the way to a lacrosse tournament in Yakima, Bear talked about Snap Scores. He
6 said that Snapchat would give you points for messaging or adding people you know. And he
7 mentioned Streaks. He was worried he might lose his Streaks that day, though his parents didn't
8 understand what that meant – it sounded like some silly part of a product made for kids.

9 190. They didn't realize the degree to which Bear had become locked into these products
10 until it was too late. Until he had become obsessed with Snap Streaks and his Snap Score.

11 191. They also didn't know that once he became more vulnerable, Meta and Google
12 collected those data points and preyed on his vulnerabilities. They program their products to target
13 the disabilities of youth, and, on information and belief, that included targeting Bear not with the
14 kinds of advertisements and videos he sought out, but instead, with the kind their technologies
15 determined would make it difficult, if not impossible, for him to look away.

16 192. Addiction led to sleep deprivation, and related mental health harms like depression
17 and anxiety – which are what Bear began to suffer as a result of Defendants' design decisions.

18 193. Once these foreseeable harms took hold, Meta and Google programmed their feeds
19 in a manner that fed Bear more of the same – suicide and self-harm. The kinds of advertisements
20 and content that would keep him hooked, rather than encouraging him to put down his device. After
21 Bear died his mom looked at some of his feed features, and it wasn't the Google she remembered
22 or the Instagram she had checked back when Bear was caught with a secret, secondary Instagram
23 account. It was harmful by design.

24 194. For example, when she opened his Instagram account, the first image Meta pushed
25 to that account – to a self-identified minor – was a photo of a lion up close with a dinner plate and
26 the message, "It is now time for you to go eat around God's dinner table." She scrolled further and
27 saw advertisements and recommendations (that is, not for accounts he followed) pushing self-harm
28 quotes, depression, and suicidality. Tons and tons of content. Messages conveying that Bear was

1 worthless, and that it was his time to not be here anymore. And Instagram organized and displayed
2 all of it to him in a manner that was overwhelming and harmful in itself. Meta's own documents
3 recognize these interface and display-based harms.

4 195. Again, these were not accounts Bear followed. These were not the choices Bear
5 made for himself. They are the choices Defendants made for Bear – and millions of other American
6 children – after appropriating their most personal data points and exploiting those data points for
7 gain. Bear and his family would never have consented to such takings and would never have
8 consented to how Defendants used Bear's data once taken. Defendants did it anyway.

9 196. For the first time in his life, Bear had trouble sleeping. At one point, Bear started
10 taking some natural sleep aids he parents purchased from Amazon. He complained about not being
11 able to sleep, but everyone believed it was because of his sports schedule and school – not the health
12 harming products Defendants marketed as non-addictive and safe for kids.

13 197. For the first time in his life, Bear experienced anxiety and depression, then
14 suicidality. Defendants knew the entire time, because they track those datapoints – the excessive
15 and unhealthy usage, the push notifications they send during class and in the middle of the night,
16 the gamification features kids cannot turn off, and the addictive mechanisms that are intended to
17 capture attention at any cost. Defendants knew. Bear's parents did not.

18 198. As the foreseeable result of Defendants' extended use designs and other defective
19 and/or inherently harmful designs and actions, Bear developed harmful dependencies on these
20 platforms, resulting in sleep deprivation, depression, anxiety, suicidal ideation, other serious mental
21 health harms not experienced prior to when such use began, and, ultimately, death.

22 199. Bear's parents had always used parental tools – the kind that would let you limit
23 access hours and block apps. About one month before Bear died, his phone was acting up so they
24 let Bear use an old device and they reminded him of the rules. He had to be off the phone by 9 pm
25 on school nights and 10 pm on weekends, and with the exception of homework. He had to limit his
26 use and use the apps for practical purposes – not to mindlessly waste time. Bear knew the rules and
27 he was the kind of kid who followed them. At least when he had that choice.

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1 200. Less than two months after Bear's death, Kaira checked the device he was using,
2 and YouTube had sent him 426 notifications. 426 notifications to a child in under 60 days. In one
3 day alone, she recalls that he received 37 Facebook notifications, 3 from Instagram, 3 from
4 YouTube, and 6 from Snapchat. And the notifications are still continuing. After a few more months
5 had passed, he had thousands of notifications on his device.

6 201. It was never ending, even though each of these platforms knew he was a child.

7 202. Bear's last hours were spent engaged with a young woman on Snapchat who chose
8 to manipulate him. She said she was struggling with suicidality, and he wanted to help. Bear is
9 believed to have exchange explicit images and videos with this young woman and regretted it. He
10 was sleep deprived, anxious, and depressed, and was being flooded with the suicide-laden algorithm
11 choices Meta and Google made for him in the days leading up to his death.

12 203. Bear (#00) died on November 9, 2025, by suicide and as the result of the mental
13 health harms these Defendants caused and/or substantially contributed to by design.



1 204. After Bear died, his parents found an envelope in his room that contained \$300. Bear
2 had written “Money for orphans in Mexico” on the envelope.

3 205. In December 2024 – a week before Christmas – Bear’s parents had taken the kids to
4 a resort in Mexico. They wanted the family to have that time together and had so much fun that
5 they booked a return trip for December of 2025. One of the most memorable things from the trip
6 was that every year at Christmas the resort would invite the kids from a local orphanage, and
7 residents would give them gifts and spend time with them. That experience left such an impression
8 on Bear that he had gone home and started saving his money for next Christmas. His parents had
9 no idea that he was doing this, until they found the envelope.

10 206. That is the kind of human Meta, Snap, and Google addicted and exploited for the
11 sake of the few hundred dollars they could make by selling advertisers Bear’s attention. That is the
12 person Bear was and always will be.

13 207. More than 1,000 people attended his celebration of life, and his death has left a hole
14 in the hearts of everyone who knew him.

15 208. Defendants targeted Bear with Artificial Intelligence (AI) driven user
16 recommendation tools, AI driven feed-based tools, and harmful social comparison and social
17 rewards tools and features.

18 209. These are harms Bear did not seek out or want. Due to the dependencies Defendants
19 created, however, they were harms Bear became unable to avoid, as Defendants reasonably foresaw
20 and intended when designing, programming, and operating their platforms.

21 210. Bear and his family did not know or have reason to know about Defendants’
22 defective and/or inherently dangerous products, features, and/or tools, or that Defendants were using
23 such products, features, and/or tools in an exploitative and harmful manner. While Defendants’
24 knowing and deliberate product design, marketing, distribution, programming and operational
25 decisions and conduct caused serious emotional, mental, and physical harms to Bear.

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1 **B. N.B.**

2 211. Plaintiff S.B., individually and on behalf of N.B. asserts claims against the Meta,
3 TikTok, Snap, Google, Roblox, and Discord Defendants in connection with Facebook, Instagram,
4 TikTok, Snapchat, YouTube, Roblox, and Discord.

5 212. N.B. lives in Hawaii County, Hawaii.

6 213. N.B. is believed to have started using YouTube first in or around 2017, at age 3, then
7 Facebook in or around 2022 at age 8, and Instagram, Snapchat, TikTok, Roblox, and Discord in or
8 around 2024 at age 10. Such use coincided with a decline in her mental health. As the foreseeable
9 result of Defendants' extended use designs and other defective and/or inherently harmful designs
10 and actions, N.B. developed harmful dependencies on these platforms, resulting in sleep
11 deprivation, depression, anxiety, self-harm in the form of cutting, exploitation, suicidal ideation,
12 attempted suicide, and other serious mental health harms not experienced prior to when such use
13 began.

14 214. Defendants targeted N.B. with Artificial Intelligence (AI) driven user
15 recommendation tools, AI driven feed-based tools, and harmful social comparison and social
16 rewards tools and features.

17 215. These are harms N.B. did not seek out or want. Due to the dependencies Defendants
18 created, however, they were harms N.B. became unable to avoid, as Defendants reasonably foresaw
19 and intended when designing, programming, and operating their platforms.

20 216. N.B. and her family did not know or have reason to know about Defendants'
21 defective and/or inherently dangerous products, features, and/or tools, or that Defendants were using
22 such products, features, and/or tools in an exploitative and harmful manner. While Defendants'
23 knowing and deliberate product design, marketing, distribution, programming and operational
24 decisions and conduct caused serious emotional, mental, and physical harms to N.B.

25 **C. S.G.**

26 217. Plaintiff N.G. on behalf of S.G. asserts claims against the TikTok and Google
27 Defendants in connection with TikTok and YouTube.

28 218. S.G. lives in Westchester County, New York.

1 219. S.G. is believed to have started using YouTube first, in or around 2020 at age 7, and
2 TikTok later, in or around 2023 at age 10. Such use coincided with a decline in her mental health.
3 As the foreseeable result of Defendants' extended use designs and other defective and/or inherently
4 harmful designs and actions, S.G. developed harmful dependencies on these platforms, resulting in
5 sleep deprivation, depression, anxiety, bulimia, self-harm in the form of cutting, suicidal ideation,
6 attempted suicide, and other serious mental health harms not experienced prior to when such use
7 began.

8 220. Defendants targeted S.G. with Artificial Intelligence (AI) driven user
9 recommendation tools, AI driven feed-based tools, and harmful social comparison and social
10 rewards tools and features.

11 221. These are harms S.G. did not seek out or want. Due to the dependencies Defendants
12 created, however, they were harms S.G. became unable to avoid, as Defendants reasonably foresaw
13 and intended when designing, programming, and operating their platforms.

14 222. S.G. and her family did not know or have reason to know about Defendants'
15 defective and/or inherently dangerous products, features, and/or tools, or that Defendants were using
16 such products, features, and/or tools in an exploitative and harmful manner. While Defendants'
17 knowing and deliberate product design, marketing, distribution, programming and operational
18 decisions and conduct caused serious emotional, mental, and physical harms to S.G.

19 **D. S.H.**

20 223. Plaintiff B.H., on behalf of S.H. asserts claims against the Meta, TikTok, and Snap
21 Defendants in connection with Instagram, TikTok, and Snapchat.

22 224. S.H. lives in Wayne County, Indiana.

23 225. S.H. is believed to have started using these platforms in or around 2024, at age 12,
24 and such use coincided with a decline in her mental health. As the foreseeable result of Defendants'
25 extended use designs and other defective and/or inherently harmful designs and actions, S.H.
26 developed harmful dependencies on these platforms, resulting in sleep deprivation, depression,
27 anxiety, suicidal ideation, and other serious mental health harms not experienced prior to when such
28 use began.

1 226. Defendants targeted S.H. with Artificial Intelligence (AI) driven user
2 recommendation tools, AI driven feed-based tools, and harmful social comparison and social
3 rewards tools and features.

4 227. These are harms S.H. did not seek out or want. Due to the dependencies Defendants
5 created, however, they were harms S.H. became unable to avoid, as Defendants reasonably foresaw
6 and intended when designing, programming, and operating their platforms.

7 228. S.H. and her family did not know or have reason to know about Defendants'
8 defective and/or inherently dangerous products, features, and/or tools, or that Defendants were using
9 such products, features, and/or tools in an exploitative and harmful manner. While Defendants'
10 knowing and deliberate product design, marketing, distribution, programming and operational
11 decisions and conduct caused serious emotional, mental, and physical harms to S.H.

12 **E. L.M.**

13 229. Plaintiff V.T., individually and on behalf of L.M. asserts claims against the Meta,
14 TikTok, Snap, and Discord Defendants in connection with Instagram, TikTok, Snapchat, and
15 Discord.

16 230. L.M. lives in Miami-Dade County, Florida.

17 231. L.M. is believed to have started using these platforms in or around 2021, at age 10,
18 and such use coincided with a decline in her mental health. As the foreseeable result of Defendants'
19 extended use designs and other defective and/or inherently harmful designs and actions, L.M.
20 developed harmful dependencies on these platforms, resulting in sleep deprivation, depression,
21 anxiety, self-harm in the form of cutting, exploitation, suicidal ideation, and other serious mental
22 health harms not experienced prior to when such use began.

23 232. Defendants targeted L.M. with Artificial Intelligence (AI) driven user
24 recommendation tools, AI driven feed-based tools, and harmful social comparison and social
25 rewards tools and features.

26 233. These are harms L.M. did not seek out or want. Due to the dependencies Defendants
27 created, however, they were harms L.M. became unable to avoid, as Defendants reasonably foresaw
28 and intended when designing, programming, and operating their platforms.

1 234. L.M. and her family did not know or have reason to know about Defendants’
2 defective and/or inherently dangerous products, features, and/or tools, or that Defendants were using
3 such products, features, and/or tools in an exploitative and harmful manner. While Defendants’
4 knowing and deliberate product design, marketing, distribution, programming and operational
5 decisions and conduct caused serious emotional, mental, and physical harms to L.M.

6 **F. G.B.**

7 235. Plaintiff Y.G., individually and on behalf of G.B. asserts claims against the Meta,
8 TikTok, Snap, and Google Defendants in connection with Instagram, TikTok, Snapchat, and
9 YouTube.

10 236. G.B. lives in Pima County, Arizona.

11 237. G.B. is believed to have started using Instagram, YouTube, and Snapchat in or
12 around 2017, at age 8 and then TikTok later, in or around 2019 at age 10. Such use coincided with
13 a decline in her mental health. As the foreseeable result of Defendants’ extended use designs and
14 other defective and/or inherently harmful designs and actions, G.B. developed harmful
15 dependencies on these platforms, resulting in sleep deprivation, depression, anxiety, suicidal
16 ideation, and other serious mental health harms not experienced prior to when such use began.

17 238. Defendants targeted G.B. with Artificial Intelligence (AI) driven user
18 recommendation tools, AI driven feed-based tools, and harmful social comparison and social
19 rewards tools and features.

20 239. These are harms G.B. did not seek out or want. Due to the dependencies Defendants
21 created, however, they were harms G.B. became unable to avoid, as Defendants reasonably foresaw
22 and intended when designing, programming, and operating their platforms.

23 240. G.B. and her family did not know or have reason to know about Defendants’
24 defective and/or inherently dangerous products, features, and/or tools, or that Defendants were using
25 such products, features, and/or tools in an exploitative and harmful manner. While Defendants’
26 knowing and deliberate product design, marketing, distribution, programming and operational
27 decisions and conduct caused serious emotional, mental, and physical harms to G.B.

1 **G. Germany Leazer**

2 241. Plaintiff Germany Leazer asserts claims against the TikTok, Snap, Google, and
3 Roblox Defendants in connection with TikTok, Snapchat, YouTube, and Roblox.

4 242. Germany lives in Rowan County, North Carolina.

5 243. Germany started using YouTube first in or around 2012, at age 4, then TikTok and
6 Roblox in or around 2016 at age 8, and finally Snapchat in or around 2020 at age 12. Such use
7 coincided with a decline in her mental health. As the foreseeable result of Defendants' extended use
8 designs and other defective and/or inherently harmful designs and actions, Germany developed
9 harmful dependencies on these platforms, resulting in sleep deprivation, depression, anxiety, body
10 dysmorphia, self-harm in the form of cutting, suicidal ideation, attempted suicide, and other serious
11 mental health harms not experienced prior to when such use began.

12 244. Defendants targeted Germany with Artificial Intelligence (AI) driven user
13 recommendation tools, AI driven feed-based tools, and harmful social comparison and social
14 rewards tools and features.

15 245. These are harms Germany did not seek out or want. Due to the dependencies
16 Defendants created, however, they were harms Germany became unable to avoid, as Defendants
17 reasonably foresaw and intended when designing, programming, and operating their platforms.

18 246. Germany did not know or have reason to know about Defendants' defective and/or
19 inherently dangerous products, features, and/or tools, or that Defendants were using such products,
20 features, and/or tools in an exploitative and harmful manner. While Defendants' knowing and
21 deliberate product design, marketing, distribution, programming and operational decisions and
22 conduct caused serious emotional, mental, and physical harms to Germany.

23 **H. Sheilia Adams**

24 247. Plaintiff Sheilia Adams asserts claims against the Meta, Snap, TikTok, and Google
25 Defendants in connection with Facebook, Instagram, Snapchat, TikTok, and YouTube.

26 248. Sheilia lives in Contra Costa County, California.

27 249. Sheilia started using these platforms in or around 2016, when she was 12 years old,
28 and such use coincided with a decline in her mental health. As the foreseeable result of Defendants'

1 extended use designs and other defective and/or inherently harmful designs and actions, Sheilia
2 developed harmful dependencies on these platforms, resulting in sleep deprivation, depression,
3 anxiety, self-harm in the form of cutting, and other serious mental health harms not experienced
4 prior to when such use began.

5 250. Defendants targeted Sheilia with Artificial Intelligence (AI) driven user
6 recommendation tools, AI driven feed-based tools, and harmful social comparison and social
7 rewards tools and features.

8 251. These are harms Sheilia did not seek out or want. Due to the dependencies
9 Defendants created, however, they were harms Sheilia became unable to avoid, as Defendants
10 reasonably foresaw and intended when designing, programming, and operating their platforms.

11 252. Sheilia did not know or have reason to know about Defendants' defective and/or
12 inherently dangerous products, features, and/or tools, or that Defendants were using such products,
13 features, and/or tools in an exploitative and harmful manner. While Defendants' knowing and
14 deliberate product design, marketing, distribution, programming and operational decisions and
15 conduct caused serious emotional, mental, and physical harms to Sheilia.

16 **III. TIMELINESS AND TOLLING OF STATUTES OF LIMITATIONS**

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

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

23 255. Due to the highly technical nature of the platforms' features, Plaintiffs and were
24 unable to independently discover that Defendants' products caused their injuries and/or sequelae
25 thereto until less than the applicable limitations period prior to the filing of this action.

26 256. Defendants had exclusive knowledge of the material defects designed and
27 implemented into their platforms, and they have at all times through the present maintained their
28 proprietary designs of their platforms' features as strictly confidential.

1 257. In addition, Defendants' fraudulent concealment and/or other tortious conduct tolled
2 the running of any statute of limitations.

3 258. Defendants had a duty to disclose dangerous and defective features that cause
4 foreseeable harm to children and teens.

5 259. Defendants knowingly, affirmatively, and actively concealed from Plaintiffs the risks
6 associated with the defects of Defendants' products and that these products caused their injuries
7 and/or sequelae thereto.

8 260. Defendants committed tortious and/or fraudulent acts that continue to this day. As of
9 the date of this Complaint, Defendants still have not disclosed, and continue to conceal, that they
10 designed and implemented dangerous features into their platforms. Despite their knowledge of the
11 defects and their attendant safety risks, Defendants continue to market their platforms to children
12 and teens while simultaneously omitting the disclosure of known and foreseeable harms to children
13 and teens. In contrast, Plaintiffs were unaware and could not have reasonably known or learned
14 through reasonable diligence that they had been exposed to the defects and risks alleged herein and
15 that those defects and risks were the direct and proximate result of Defendants' acts and omissions.

16 261. Plaintiffs were unaware and could not have reasonably known or learned through
17 reasonable diligence that the harms they suffered were directly and proximately caused by
18 Defendants' acts and omissions.

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

24 **IV. PLAINTIFFS' CLAIMS**

25 263. The entirety of this Complaint is pled upon information and belief and each allegation
26 contained herein is likely to have evidentiary support after a reasonable opportunity for further
27 investigation or discovery.

28 264. Plaintiffs plead all Causes of Action of this Complaint in the broadest sense, pursuant

1 to all laws that may apply under choice-of-law principles, including the law of the resident states of
2 Plaintiffs. To the extent applicable to specific Causes of Action, Plaintiffs plead these Causes of
3 Action under all applicable product liability acts, statutes, and laws of their respective States.

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

6 **COUNT 1:**
7 **STRICT LIABILITY – DESIGN DEFECT**
8 **(Against All Defendants)**

9 266. Plaintiffs reallege and incorporate by reference each preceding and succeeding
10 paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully
11 herein Paragraphs 825 through 850 of the Master Complaint.

12 **COUNT 2:**
13 **STRICT LIABILITY – FAILURE TO WARN**
14 **(Against All Defendants)**

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

18 **COUNT 3:**
19 **NEGLIGENCE – DESIGN**
20 **(Against All Defendants)**

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

24 **COUNT 4:**
25 **NEGLIGENCE – FAILURE TO WARN**
26 **(Against All Defendants)**

27 269. Plaintiffs reallege and incorporate by reference each preceding and succeeding
28 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)

270. Plaintiffs reallege and incorporate by reference each preceding and succeeding

1 paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully
2 herein Paragraphs 913 through 938 of the Master Complaint.

3 **COUNT 6:**
4 **FRAUDULENT CONCEALMENT**
5 **(Against the Meta Defendant)**

6 271. Plaintiffs Kaira Rysdam, individually and as successor-in-interest to Brehnan “Bear”
7 Rysdam, Deceased, S.B. and N.B., B.H. and S.H., Y.G. and G.B., and Sheilia Adams reallege and
8 incorporate by reference each preceding and succeeding paragraph as though set forth fully at length
9 herein.

10 272. This claim is brought against Meta.

11 273. Plaintiffs hereby incorporate as though set forth fully herein Paragraphs 958 through
12 976 of the Master Complaint.

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

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

26 276. Had Meta publicly or privately disclosed the risks of harm associated with its
27 products’ defects, these Plaintiffs would have been aware of such disclosures and would not have
28 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

1 opened an account.

2 **COUNT: 7**
3 **NEGLIGENCE PER SE**
4 **(Against All Defendants)**

5 277. Plaintiffs S.B. and N.B. (as against the Meta, Snap, TikTok, Google, Roblox, and
6 Discord Defendants), N.G. and S.G. (as against the TikTok and Google Defendants), V.T. and L.M.
7 (as against the Meta, Snap, TikTok, and Discord Defendants), Y.G. and G.B. (as against the Meta,
8 Snap, TikTok, and Google Defendants), Germany Leazer (as against the Snap, TikTok, Google, and
9 Roblox Defendants), and Sheilia Adams (as against the Meta, Snap, TikTok and Google
10 Defendants) re-allege and incorporate by reference each preceding and succeeding paragraph as
11 though set forth fully at length herein, and hereby incorporate as though set forth fully herein
12 Paragraphs 994 through 1013 of the Master Complaint.

13 **COUNT 8:**
14 **WRONGFUL DEATH**
15 **(Against the Meta, Snap, and Google Defendants)**

16 278. Plaintiff Kaira Rysdam, individually and as successor-in-interest to Brehnan “Bear”
17 Rysdam, Deceased, realleges and incorporates by reference each preceding and succeeding
18 paragraph as though set forth fully at length herein.

19 279. This Cause of Action is asserted by and on behalf of Plaintiffs bringing their actions
20 as heirs of Decedents or as duly-appointed representatives of the estates of Decedents or successor-
21 in-interests pursuant to the laws of various states.

22 280. As a direct and proximate result of the conduct of each of the identified Defendants
23 and the defective nature of their respective social media products as outlined above, Decedent
24 suffered wrongful death, and Plaintiff suing as heir or estate representative of Decedent seeks
25 damages therefor, including loss of financial support, loss of society, funeral expenses, estate
26 administration expenses, and noneconomic damages including pain and suffering as permitted under
27 various states’ laws, and where applicable punitive damages.

28 281. These Plaintiffs demand judgment against each of the Defendants for compensatory,
treble, and punitive damages, together with interest, costs of suit, attorneys’ fees, as permitted under
various states’ laws and all such other relief as the Court deems proper.

COUNT 9:
SURVIVAL ACTION
(Against the Meta, Snap, and Google Defendants)

282. Plaintiff Kaira Rysdam, individually and as successor-in-interest to Brehnan “Bear” Rysdam, Deceased, re-alleges and incorporates by reference each preceding and succeeding paragraph as though set forth fully at length herein.

283. This Cause of Action is asserted by and on behalf of heirs of Decedents or the duly appointed representatives of the estates of Decedents, pursuant to the laws of various states.

284. As a direct and proximate result of the conduct of each of the identified Defendants and the defective nature of their respective social media products as outlined above, Decedent suffered bodily injury resulting in pre-death pain and suffering, disability, disfigurement, mental anguish, emotional distress, loss of capacity of the enjoyment of life, a shortened life expectancy, expenses for hospitalizations and other medical and nursing treatments, loss of earnings, and loss of ability to earn. Plaintiffs suing as heirs or estate representatives seek damages for these injuries to their respective Decedents as permitted under various states’ laws, including where applicable punitive damages.

285. Plaintiffs demand judgment against each of the Defendants for compensatory, treble, and punitive damages, together with interest, costs of suit, attorneys’ fees, as permitted under various states’ law, and all such other relief as the Court deems proper.

COUNT 10:
LOSS OF CONSORTIUM AND SOCIETY
(Against All Defendants)

286. Plaintiffs Kaira Rysdam, individually and as successor-in-interest to Brehnan “Bear” Rysdam (as against the Meta, Snap, and Google Defendants), S.B. and N.B. (as against the Meta, Snap, TikTok, Google, Roblox, and Discord Defendants), V.T. and L.M. (as against the Meta, Snap, TikTok, and Discord Defendants), Y.G. and G.B. (as against the Meta, Snap, TikTok, and Google Defendants), 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 1033 through 1036 of the Master Complaint.

1 **V. DEMAND FOR JURY TRIAL**

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

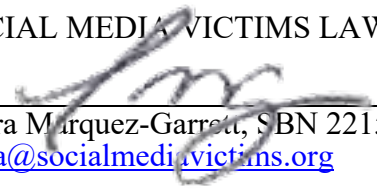
3 **VI. PRAYER FOR RELIEF**

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

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

25 Dated: July 28, 2026.

26 SOCIAL MEDIA VICTIMS LAW CENTER

27 By: 
28 Laura Marquez-Garrett, SBN 221542
laura@socialmediavictims.org

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