

IN THE SUPERIOR COURT OF ALLEN COUNTY

STATE OF INDIANA, <div style="text-align: center;"><i>Plaintiff,</i></div> <div style="text-align: center;">v.</div> TIKTOK INC., <div style="text-align: center;">and,</div> BYTEDANCE LTD., <div style="text-align: center;"><i>Defendants.</i></div>	Case No. _____
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AFFIDAVIT

1. My name is Megan M. Wold. I am an attorney with the firm Cooper & Kirk PLLC. I am admitted to the bars of Ohio and the District of Columbia.

2. Between October 26 and 31, 2022, I screen recorded a series of videos in the TikTok app using a user profile registered to a 13-year old user. I screen recorded these videos on a “burner” phone that had no prior web browsing history, contacts, or other stored information.

3. The exhibits are copies of videos that I screen recorded between October 26 and 31, 2022.¹

4. Exhibit 6 is a video showing that typing “shr” into the TikTok search bar offers the autocomplete suggestion “shroomz” which returns videos depicting users tripping on shrooms. I recorded this video with “Restricted Mode” turned on.

5. Exhibit 7 is a video showing that typing “shr” into the TikTok search offers the autocomplete suggestion “shr0omies trip,” which returns videos depicting users tripping on

¹ Note the following exception: I recorded Attachment 79 on November 29, 2022, using the same account registered to a 13-year-old user and on the same “burner” phone.

shrooms and describing their experiences tripping on shrooms. I recorded this video with “Restricted Mode” turned on.

6. Exhibit 8 is a video showing that searching for “shroomtok” on TikTok returns no results while searching for “shroomtok” returns videos about tripping on shrooms. I recorded this video with “Restricted Mode” turned on.

7. Exhibit 9 is a video showing that typing “alc” into the TikTok search bar offers the autocomplete suggestion “alc for teens,” and videos returned by that suggestion include videos about how to take alcohol from a parent’s liquor bottles, alcoholic drinks that “all” teens have tried, and about underage alcohol purchases. I recorded this video with Restricted Mode turned on.

8. Exhibit 10 is a video showing that typing “alc” into the TikTok search bar offers the autocomplete suggestion “alchol brevages,” and that suggestion returns videos about making alcoholic drinks that do not taste like alcohol or that do taste like candy. I recorded this video with “Restricted Mode” turned on.

9. Exhibit 11 is a video showing the number of views associated with a series of hashtags that are searchable on TikTok and related to drinking games. I recorded this video with “Restricted Mode” turned on.

10. Exhibit 12 is a video showing that searching for “drinking game” on TikTok returns results describing drinking games, some of which have millions of likes, including a drinking game involving toy cars. I recorded this video with “Restricted Mode” turned on.

11. Exhibit 13 is a video searching for “canna recipes” on TikTok, which returns videos showing how to infuse cannabis into butter or cook with cannabis. I recorded this video with “Restricted Mode” turned on.

12. Exhibit 14 is a video showing that typing “edib” into the TikTok search bar offers the Autocomplete suggestion “ediblestiktok recipes,” which returns videos about cannabis-laced gummies. I recorded this video with “Restricted Mode” turned on.

13. Exhibit 15 is a video showing search results for “canna gummies” on TikTok. I recorded this video with “Restricted Mode” turned on.

14. Exhibit 16 is a video showing search results for “ediblestiktok gummies” on TikTok. I recorded this video with “Restricted Mode” turned on.

15. Exhibit 17 is a video showing that a video of a young man eating cannabis edibles throughout the day, which has 13.2 million views on TikTok. I recorded this video with “Restricted Mode” turned on.


16. Exhibit 19 is a video showing that typing “spi” into the TikTok search bar offers the autocomplete suggestion “spiceytok,” which returns thousands of videos about sex. I recorded this video with “Restricted Mode” turned on.

17. Exhibit 20 is a video showing that typing “ki” into the TikTok search bar offers the autocomplete suggestion “kintiktok,” which returns videos about sexual kinks, including “CNC,” which stands for “consensual non-consent.” I recorded this video with “Restricted Mode” turned on.

18. Exhibit 21 is a video showing that typing “stri” into the TikTok search bar offers the autocomplete suggestion “skripper tiktok,” which returns videos about strippers, including pole dancing routines and other search term suggestions leading to more videos about similar themes. I recorded this video with “Restricted Mode” turned on.

19. Exhibit 22 is a video showing that a video about a stripper dayshift has 13.7 million views on TikTok. I recorded this video with “Restricted Mode” turned on.

20. Exhibit 23 is a video from a self-professed “18 yr old baby skripper.” The video has 2.2 million views. This video is not visible in “Restricted Mode.”

21. Exhibit 24 is a video of search results for “s  s” which stands for “seggs,” which is a common TikTok euphemism for “sex.” “Restricted Mode” is turned on.

22. Exhibit 25 is a video showing a TikTok #striptok video with 2.8 million views. I recorded this video with “Restricted Mode” turned on.

23. Exhibit 26 is a video showing a TikTok pole dancing video with 1.5 million views. I recorded this video with “Restricted Mode” turned on.

24. Exhibit 27 is a video showing two TikTok pole dancing videos with 2.1 million and 13.9 million views, respectively. I recorded this video with “Restricted Mode” turned on.

25. Exhibit 28 is a video showing a TikTok pole dancing video with 1.1 million views. I recorded this video with “Restricted Mode” turned on.

26. Exhibit 29 is a video of a woman pole dancing in a thong one-piece, which has 3.4 million views. I recorded this video with “Restricted Mode” turned on.

27. Exhibit 30 is a video of a man and a woman pole dancing together and wearing thong underwear. The video has 5.3 million views. This video is not visible in “Restricted Mode.”

28. Exhibit 31 is a video showing TikTok searches for “exoticpole,” “exoticpoledancer,” “poledancer,” and “poledancertiktok.” I recorded this video with “Restricted Mode” turned on.

29. Exhibit 32 shows search results for “exoticdance” on TikTok, including a pole dancing video with over 800,000 views and several other pole dancing videos from the same user. I recorded this video with “Restricted Mode” turned on.

30. Exhibit 33 is a video in which a professional mistress discusses her experiences with pegging and “anal play.” This video has 3.6 million views. This video is not visible in “Restricted Mode.”

31. Exhibit 34 is a video showing a video about pegging that includes a sex toy and that has 2.8 million views on TikTok. I recorded this video with “Restricted Mode” turned on.

32. Exhibit 35 is a TikTok video that includes the text “he finally let me peg him” and has 3.7 million views. I recorded this video with “Restricted Mode” turned on.

33. Exhibit 36 is a video of search results when searching for “he finally let me peg” on TikTok. I recorded this video with “Restricted Mode” turned on.

34. Exhibit 37 shows search results for “p3gging tutorial” *without* “Restricted Mode” enabled.

35. Exhibit 38 is a video showing that a TikTok video of a dominant and submissive partner with a belt has 35 million views. I recorded this video with “Restricted Mode” turned on.

36. Exhibit 39 is a video showing a TikTok video in which a submissive partner describes the control a dominant partner exercises over him and which has 2.6 million views on TikTok, as well as other videos from the same user about related kinks. I recorded this video with “Restricted Mode” turned on.

37. Exhibit 40 is a TikTok video in which a dominant partner describes physical abuse during sex, which has 547,300 views. I recorded this video with “Restricted Mode” turned on.

38. Exhibit 41 is a TikTok video showing bondage imagery, which has 65,000 views. I recorded this video with “Restricted Mode” turned on.

39. Exhibit 42 is a video showing a TikTok video describing “CNC” as an evolution of a choking kink, which has 3.5 million views. I recorded this video with “Restricted Mode” turned on.

40. Exhibit 43 is a video of a TikTok video that excerpts explicit text from Wattpad that includes descriptions of a CNC sex scene and has 2.1 million views. I recorded this video with “Restricted Mode” turned on.

41. Exhibit 44 is a video from TikTok user @kink.outspoken describing CNC and telling viewers to go “have fun.” This video has over 750,000 views. This video is not visible in “Restricted Mode.”

42. Exhibit 45 is a video of a user mentioning a CNC kink, which has 2.4 million views, and a video of the same user lip syncing to “She’s So Nice” by Pink Guy. I recorded this video with “Restricted Mode” turned on.

43. Exhibit 46 is a video of search results for “cnc knik,” a search suggestion that TikTok’s Autocomplete function offers. I recorded this video with “Restricted Mode” turned on.

44. Exhibit 47 is a video of search results for “fIngering,” which include two detailed instructional videos, which have over 13 million and over 7 million views, respectively. The user defines “fingering” as “using your fingers to penetrate someone’s vagina.” I recorded this video with “Restricted Mode” turned on. I recorded this video on November 29, 2022.

45. Exhibit 48 is a TikTok twerking video with over 5 million views. I recorded this video with “Restricted Mode” turned on.

46. Exhibit 49 is a video showing that typing “b” into the TikTok search bar offers the autocomplete suggestion “BADDIESONLY,” which returns videos of women twerking, men

taking body shots off women, and close-up videos of tongue-to-tongue kissing. I recorded this video with “Restricted Mode” turned on.

47. Exhibit 50 is a video of TikTok user @yen_lachinita showing one of her videos with 15.3 million views and showing that the video directs users to her Instagram handle, which links to her OnlyFans page. I recorded this video with “Restricted Mode” turned on.

48. Exhibit 51 is a video of TikTok user @itstemplo showing one of his videos with 1.0 million views and showing that his TikTok profile directs users to his Instagram handle, which links to his OnlyFans page. I recorded this video with “Restricted Mode” turned on.

49. Exhibit 52 is a TikTok video with 1.5 million views that glorifies sexual bondage imagery. I recorded this video with “Restricted Mode” turned on.

50. Exhibit 53 is a TikTok video with 2.2 million views that lists sexual kinks that include “forced submission” and “pain (biting, scratching, etc.)” I recorded this video with “Restricted Mode” turned on.

51. Exhibit 54 is a video giving instructions to tie a pentagram-shaped harness for sexual rope play, which has over 950,000 views. I recorded this video with “Restricted Mode” turned on.

52. Exhibit 55 is a TikTok video with 25.3 million views purporting to show wet stains across a bed and curtains after the TikTok user “squirt[ed]” using a “vibrator.” I recorded this video with “Restricted Mode” turned on.

53. Exhibit 56 is a video with 1.7 million views that advocates using butt plugs to prevent a man from “staring” at a woman’s “a55” (meaning “ass”) during “doggy” (meaning doggy-style sex). I recorded this video with “Restricted Mode” turned on.

54. Exhibit 57 is a video with 2.7 million views that depicts 58 seconds of close-up open-mouth kissing between two people, including biting and tongue-sucking. This video is not visible in “Restricted Mode.”

55. Sealed exhibit 58 is a TikTok video with 154,000 views that shows individuals who appear to be minors twerking. I recorded this video with “Restricted Mode” turned on.

56. Sealed exhibit 59 is a video by TikTok user @pimpforsimps, which purports to show a 16-year-old twerking on a bed. This video is not visible in “Restricted Mode”.

57. Sealed exhibit 60 is a video showing the entire dance sequence from the Netflix film, *Cuties*. This video is not visible in “Restricted Mode.”

58. Exhibit 61 is a video showing search results for “wattpad.” I recorded this video with “Restricted Mode” turned on.

59. Exhibit 62 is an Addison Rae dance video set to “WAP,” which has 312.3 million views. I recorded this video with “Restricted Mode” turned on.

60. Exhibit 63 is a WAP dance video with 3.7 million views, featuring a user wearing fishnet stockings and a short skirt. I recorded this video with “Restricted Mode” turned on.

61. Exhibit 64 is a video posted by TikTok user Addison Rae, which has 15.2 million views, set to the song “We Not Humping.” I recorded this video with “Restricted Mode” turned on.

62. Exhibit 65 shows that over 500,000 TikTok videos have been set to the song “We Not Humping.” I recorded this video with “Restricted Mode” turned on.

63. Exhibit 66 is a video by top user Charli D’Amelio set to the song “We Not Humping.” The video has 37.3 million views. This video is not visible in “Restricted Mode.”

64. Exhibit 67 is TikTok user Camila Mendes dancing to “We Not Humping” in a video with 36.3 million views. I recorded this video with “Restricted Mode” turned on.

65. Exhibit 68 is a video by TikTok user Loren Gray in which she performs a dance to “We Not Humping” in a thong bikini. The video has 5.6 million views. This video is not visible in “Restricted Mode.”

66. Exhibit 69 is a video of TikTok user Charli d’Amelio dancing to the song “Super Freaky Girl.” This video has 40.3 million views. I recorded this video with “Restricted Mode” turned on.

67. Exhibit 70 is a video by user @peachmangojuice777 with 4.2 million views, set to the song “Fucked by a Cowboy.” This video is not visible in “Restricted Mode.”

68. Exhibit 71 is a video showing TikTok videos set to the music “She’s So Nice” by Pink Guy, which contains words like “fuck,” “clit,” and “dick.” I recorded this video with “Restricted Mode” turned on.

69. Exhibit 72 is a dance video by user @juliecloudss set to the song “She’s So Nice” by Pink Guy. This video is not visible in “Restricted Mode.”

70. Exhibit 73 is a video of showing search results for “clicc clacc.” I recorded this video with “Restricted Mode” turned on.


71. Exhibit 74 is a video of scrolling the “For You” page with “Restricted Mode” enabled that ends with a video set to the song “Fuck Off.”

72. Exhibit 75 is a video set to the song “Fuck Off,” which has 3.5 million views. I recorded this video with “Restricted Mode” turned on.

73. Exhibit 76 is a video showing that over 19,000 videos on TikTok are set to the song “Fuck Off.” I recorded this video with “Restricted Mode” turned on.

Date: December 7, 2022

Respectfully submitted,


Megan M. Wold*

Counsel for Plaintiff, State of Indiana

*Application for admission *pro hac vice*
forthcoming