



December 13, 2022

Sundar Pichai  
Chief Executive Officer  
Google Inc.  
1600 Amphitheatre Parkway  
Mountain View, CA 94043

Re: TikTok's Google Play Store Age Rating

Dear Mr. Pichai:

We write to demand that you take immediate action to correct the "T" for "Teen" age rating displayed in the Google Play Store for the TikTok app by the end of the year.

Some of us are already pursuing or considering legal action against TikTok due to its failure to correct the age-rating misrepresentations made about its app in the Google Play Store, but we believe that Google also bears responsibility for the age rating misrepresentations displayed on TikTok's Google Play page. Google Play has selected the Entertainment Software Ratings Board ("ESRB") rating system for rating the apps it makes available to consumers, and although the ESRB rating system requires app developers to answer extensive content-related questions for apps in the "gaming" category (including questions about alcohol, tobacco, and drug content, sexual content, and strong language), Google Play asks virtually no content-related questions of app developers seeking to offer "social media" apps like TikTok in Google Play. Nonetheless, Google Play informs consumers that a "T" for "Teen" rating reflects "[c]ontent [that] is generally suitable for ages 13 and up." With regard to TikTok, that assertion is patently false, and it is misleading and deceptive to consumers.

Google Play currently displays a "T" for "Teen" age rating for the TikTok app. The only reasons Google gives for this age rating are that "Users Interact," the app "Shares Location," and the app offers "In-App Purchases." Yet Google Play informs consumers that content in apps labeled "T" for "Teen" "is generally suitable for ages 13 and up," and that such apps "[m]ay contain suggestive themes ... and/or infrequent use of strong language." By contrast, Google Play informs consumers that apps with an "M" for "Mature" rating contain "[c]ontent [that] is generally suitable for ages 17 and up," and "[m]ay contain intense ... sexual content and/or strong language." Google Play also directs consumers to the ESRB for more information on its age-rating categories. There, parents can see that many content descriptors exist in addition to "Users Interact," "Shares Location," and "In-App Purchases." These additional content descriptors include categories related to "sexuality," "nudity," "substances," and "language," each of which contains numerous

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content descriptors like “Sexual Themes” (defined as “References to sex or sexuality”) and “Drug Reference” (defined as “Reference to and/or images of illegal drugs”).

The TikTok app can only plausibly qualify for an “M” for “Mature” rating from Google Play. The TikTok app contains frequent and intense alcohol, tobacco, and drug use or references, sexual content, profanity, and mature/suggestive themes. TikTok users can search for hundreds of thousands of hashtags related to these topics, which each return thousands of videos in these categories—instructional videos about drug use, descriptions of drinking games, recipes for cannabis edibles, demonstrations of vaping tricks, pole dancing routines, descriptions of sexual kinks and rape fantasies, and millions of videos set to songs with explicit lyrics, which TikTok makes available to users in its music library. TikTok not only allows users to find this content, but it suggests it to users through its “autocomplete” search function and by offering this type of content to users on the “For You” page. This is true even for TikTok accounts registered to 13-year-old users and even when “Restricted Mode” is enabled for such a user (“Restricted Mode” is a content control tool that TikTok claims will filter objectionable content for users). TikTok is also aware that a large number of its users are under 13 years old and have lied about their age in order to create a profile on TikTok’s platform. These under-13 users have access to the objectionable content and features just described.

This deception has real consequences for kids and parents. Parents rely on Google Play’s age-rating descriptions when deciding which apps they will allow their kids to use. They do this through direct supervision and by setting parental controls on their kids’ devices, which can prevent kids under 17 from downloading apps with an “M” for “Mature” rating. Parents depend on the accuracy of Google Play’s age ratings. Google shares the responsibility to ensure that apps like TikTok display an accurate age rating to consumers. When parents are deceived into letting their kids download TikTok, there are real consequences. Exposure to drug, alcohol, and tobacco content on social media makes kids more likely to use or experiment with those illicit substances in real life. And exposure to sexual content on TikTok can lead to pornography addiction and even the sexual exploitation of kids by online predators.

The undersigned State Attorneys General urge you to take immediate action to correct TikTok’s Google Play age rating from “T” for “Teen” to “M” for “Mature,” and to correct the age rating content descriptors that accompany it. Absent such action, we reserve the right to take legal action against Google for the ongoing Google Play misrepresentations about TikTok, up to and including litigation and civil penalties.

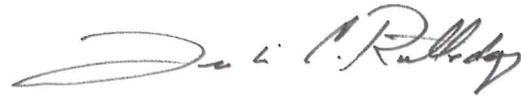
Sincerely,



Austin Knudsen  
Montana Attorney General



Steve Marshall  
Alabama Attorney General



Leslie Rutledge  
Arkansas Attorney General



Ashley Moody  
Florida Attorney General



Chris Carr  
Georgia Attorney General



Todd Rokita  
Indiana Attorney General



Daniel Cameron  
Kentucky Attorney General



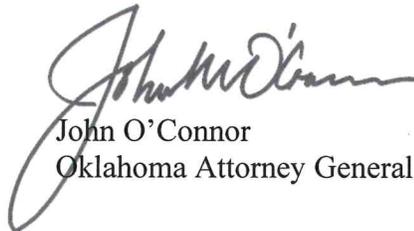
Jeff Landry  
Louisiana Attorney General



Lynn Fitch  
Mississippi Attorney General



Drew Wrigley  
North Dakota Attorney General



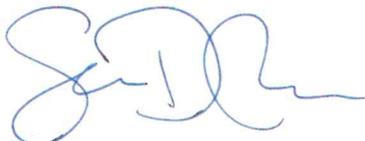
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