

IN THE PHILADELPHIA COURT OF COMMON PLEAS

COMMONWEALTH OF PENNSYLVANIA,	:	CIVIL ACTION
OFFICE OF ATTORNEY GENERAL,	:	
By Attorney General David W. Sunday, Jr.,	:	EQUITY
	:	
Plaintiff,	:	
	:	
v.	:	No.
	:	
SNAP, INC. :	:	
	:	PUBLIC REDACTED
Defendants.	:	
	:	

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You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally, or by attorney and filing, in writing, with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

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THIS IS NOT AN ARBITRATION CASE-

This case has been brought by the Commonwealth under the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. §§ 201-1, *et seq.*,
AN ASSESSMENT OF DAMAGES HEARING IS REQUIRED

IN THE PHILADELPHIA COURT OF COMMON PLEAS

COMMONWEALTH OF PENNSYLVANIA,
by ATTORNEY GENERAL DAVID W. SUNDAY, Jr.

CIVIL ACTION

No.

Plaintiff,

v.

EQUITY

SNAP INC.,

Defendant.

PUBLIC REDACTED

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

1. Snap Inc. (“Snap”) operates the Snapchat social media platform, which is enormously popular among Pennsylvania teenagers and easily accessible to them online. Snap markets its app as safe for users as young as 13 even though Snap knows that its app carries a high risk of harm to minors and indeed does harm many minors.

2. Specifically, when Snap makes the Snapchat app available in Apple’s App Store, it answers a rubric of questions provided by Apple, and in doing so, tells Pennsylvania consumers that Snapchat is rated “13+” (previously “12+”) and that it contains only (“infrequent”) (previously, “infrequent/mild”) “profanity and crude humor,” “sexual content or nudity,” “alcohol, tobacco, and drug use or references,” and “mature/suggestive themes.” In fact, content on Snapchat in Apple’s age-rating categories just described is easily available *and even recommended by Snap* to users known to be as young as 13 years old. Snap similarly misrepresents the content of its app

in the Google Play and Microsoft stores in a way that causes them to give its app a “T” for “Teen” rating, designating it as appropriate for 13-year-olds.

3. Snap also knowingly deceives Pennsylvania consumers about the risk of harm that its app poses to young users. Snap has designed its app to be highly addictive, especially to children and teens. One of the hallmark features of Snapchat is ephemeral content—content that disappears a short time after it is posted or after a user views it. Ephemeral content drives addiction by causing young users to return frequently to the app or risk missing out on content that will disappear. Snap also has designed its app to feature infinite scroll, which means that a user can scroll endlessly through content on Snapchat without any “end.” Infinite scroll also drives behavioral addiction by keeping users on the platform for long periods of time as they view a never-ending stream of content.

4. Other features of Snapchat also create or contribute to addiction in young users. Push notifications remind young users to visit the app frequently throughout the day and often also at all hours of the night. Autoplay automatically plays content when a user opens the app, propelling the user into the experience of scrolling content (which never ends, thanks to infinite scroll). Snapchat also publishes personal interactive metrics like “Snapcores” and “Snapstreaks,” which grade a user’s frequency of engaging with the app or frequency of engaging with another user. Users must maintain high levels of engagement with the Snapchat app to preserve or improve these personal interactive metrics.

5. All of these design choices lead to behavioral addiction among young Snapchat users, which harms their mental and physical health. Snap knows and intends these effects but does not warn Snap users or their parents about them. Instead, Snap affirmatively represents that Snapchat is safe and appropriate for young users.

6. The Commonwealth brings this suit pursuant to § 201-4 of the Pennsylvania Unfair Trade Practices and Consumer Protection Law (UTPCPL) to restrain, by temporary or permanent injunction, any unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce declared unlawful by § 201-2(4)(i) through (xxi) of the UTPCPL and to obtain restitution and other relief, as this Court deems appropriate, pursuant to 73 P.S. §§ 201-1, *et seq.*

JURISDICTION

7. This is an action for statutory and equitable relief under the Unfair Trade Practices and Consumer Protection Law (UTPCPL), 73 P.S. Section 201-1, *et seq.*

8. Snap's violations occurred in or affect more than one district in the Commonwealth of Pennsylvania, including Philadelphia County.

9. Venue is proper in this Court because allegations in this Complaint establish that the cause of action accrued in Philadelphia County.

10. This Court has personal jurisdiction over Defendant in this action under Pennsylvania's long-arm statute, 42 Pa. C.S. § 5322, because Snap has substantial contacts in Pennsylvania. Snap operates a social media application and platform that it has directed to operate in the Commonwealth of Pennsylvania. The Snapchat app has been activated by a device located in Pennsylvania thousands of times. Snap markets and advertises its product in Pennsylvania, including on the Apple App Store, Google Play Store, and Microsoft Store. Snap actively serves content to and collects data from those devices and accounts located in Pennsylvania. Snap generates millions of dollars of annual revenue in Pennsylvania by making Snapchat available to users here.

11. Snap has millions of users in Pennsylvania, including tens of thousands of users who are under 16 years old. Snap generates millions of dollars of annual revenue by making Snapchat available to users in Pennsylvania.

12. Snap compensates users in Pennsylvania for content that they create and post on the Snapchat app.¹

13. When someone downloads and signs up for an account on Snapchat, they agree to Snap's Terms of Service, which is a contract between the user and Snap. Under that contract, the user agrees to allow Snap to collect data about the user, including the user's geographical location and IP address. In return, Snap makes the Snapchat application available to the user. This contractual relationship involves ongoing performance by both parties, with both the user and Snap performing under the contract each time the user accesses Snapchat.

14. The content that Snapchat displays to users is determined in part by the user's location. For example, a user of Snapchat in Pennsylvania is more likely to see content related to the Phillie Phanatic simply by being located in Pennsylvania.

15. Snap sells advertisements to third parties to target users in Pennsylvania. The advertisements on Snapchat are targeted at users based in part on their locations. For example, a Snapchat user might see an advertisement for a local hoagie shop based on his location in Altoona.

16. The conduct described in this Complaint arises from Snap's activities directed to Pennsylvania and Snapchat users in Pennsylvania.

17. Snap has availed itself of the benefit of transacting business in Pennsylvania through the marketing, sale, and operation of a well-known social media and advertising network.

¹ *About Snapchat's Monetization Program – Snapchat Support*, SNAP, <https://perma.cc/862D-KBR7>.

Snap is aware of its presence in Pennsylvania and the financial rewards it receives from operating within Pennsylvania, including its transactions with minors in Pennsylvania.

18. Snap has specifically targeted Pennsylvania parents, minors, teachers, businesses, and media in the Commonwealth of Pennsylvania to market and promote the Snapchat app, continuously seeking to increase its Pennsylvania user-base through various means, and to gain business advantages from Pennsylvania-based users and their content.

PARTIES

19. The Commonwealth of Pennsylvania, through its Attorney General, is authorized to initiate proceedings in the public interest to restrain unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce, seek restitution, and obtain any other relief, as this Court deems appropriate. 73 P.S. §§ 201-1, *et seq.*

20. Defendant Snap Inc. (“Snap”) is a foreign for-profit entity regularly transacting, soliciting, and conducting business in Pennsylvania that is incorporated in Delaware. Snap is headquartered at 3000 31st Street, Santa Monica, California. Snap’s North American operations in 2024 yielded over \$5.3 billion in revenue. Snap is valued at more than \$12 billion.

FACTUAL ALLEGATIONS

Overview of Snapchat

21. The Snapchat app (“Snapchat”) is a social media platform that enables its users to create, share, and consume digital content—primarily photos and videos. The major elements of Snapchat, as they exist today, are briefly described below.

22. Generally, the Snapchat app opens to a screen on which the user can take photos or videos through the device’s camera. Users may create content by taking photos or videos on this screen or by importing existing photos or videos stored on their devices.

23. The Snapchat app allows users to modify their photos or videos, including by adding user-generated text or freehand drawings or by adding supplementary content created by Snap. For example, Snap makes “Lenses” available, which alter the appearance of human faces or other content in photos or videos. Photos and videos thus taken and modified are known as “Snaps.”

24. On Snapchat, users can add other users as “Friends.” So-called “Friends” on Snapchat may not actually know each other in real life. Users can share their Snaps with their Friends individually or in groups, or they can send text-only messages to Friends using the “Chat” function. Shared Snaps and Chats are usually ephemeral, meaning that the recipient can view them only for a limited time (for example, 24 hours), and once viewed, Snaps remain available for a limited time (for example, ten seconds).

25. Snapchat displays metrics for users that track the frequency of the user’s correspondence with Friends. “Snapstreaks” is a metric that records the number of consecutive days both users have sent Snaps to one another. “Best Friends” is a metric that measures, relatively speaking, who a user communicates with most frequently.

26. A user may also send Snaps or Chats to “My AI” in Snapchat, a chatbot that generates responses using generative artificial intelligence. The user exchanges content with “My AI” in the same way as any other Snapchat Friend.

27. Another Snapchat feature is “Stories,” which allows “Snaps” to be shared with all of a user’s Friends (or a subset of Friends). By default, Snaps posted to Stories are available for viewing for 24 hours and can be viewed by other users an unlimited number of times during that period. Users can see a list of other users who have viewed any particular Story, which also allows

them to know who among their friends has *not* viewed a particular Story. A Story posted to a subset of a user's Friends is known as a "Private Story."

28. The "Search" function on Snapchat allows users to find "Friends." They can search for names or words, and the search results are based on the user's search terms as well as the user's past activity on the app.

29. "Search," among other things, also allows users to search for other users that they might add as a contact. The results of the search are based both on the user's input search terms and the user's other activity on the app.

30. The "Find Friends" feature also recommends other users to add as "Friends." This feature makes recommendations based on an algorithm that takes into account the user's activity on Snapchat.

31. Snapchat also allows a user to view Snaps created by other users without adding them as "Friends."

32. The "Snap Maps" feature allows users to view Snaps that are associated with physical locations on a map. Any Snapchat user can add Snaps to locations on the Snap Map. The Snap Map feature also allows users to see their friends' locations, if their friends enable location sharing.

33. Snapchat's "Spotlight" feature allows users to scroll through short-video Snaps in a never-ending feed. "Spotlight" features infinite scrolling (a user will never get to the "end" of the content), and each video plays automatically, one after another. Any Snapchat user may post Snaps in Spotlight. Of the submitted content, Snapchat chooses the next Snap to play for any given user based on an algorithm that takes into account the user's past activity on the platform.

34. Snapchat’s “Discover” feature is similar: it allows users to view Snaps and other content in a feed with infinite scroll and auto-play, but Snaps in Discover are submitted only by certain semi-professional users of Snapchat or professional publishers with whom Snap has entered into agreements for this purpose. Of the submitted content, Snapchat recommends the next Snap to a user based on an algorithm that takes into account the user’s activity on the platform.

35. Snap also offers, for a recurring fee, its Snapchat+ product, which adds a set of many additional elements to the Snapchat app that are unavailable to non-paying users. One such additional element, for example, is the capability for a user to view the “Best Friends” of other users. Snapchat advertises Snapchat+ to its users in various parts of the app.

36. Snap also allows users to make in-app purchases. For example, a user may opt to pay a one-time fee to restore a “Snapstreak” that has ended.

37. Young people are a critical user base of Snapchat. CEO Evan Spiegel remarked that he and his cofounder “were thrilled to hear that most of [Snapchat’s users] were high school students who were using Snapchat as a new way to pass notes in class—behind-the-back photos of teachers and funny faces were sent back and forth throughout the day. Server data supported this and we saw peaks of activity during the school day and dips on the weekends.”²

38. Snap says its app “delivers on the emotions that Gen Z seeks and it does so consistently across the platform. . . . Remember, this is a group that plays a major role in this eye-popping stat: People who use Snapchat open the app 30+ times a day and send 4 billion+ messages.”³

² Evan Spiegel, *Let’s Chat*, SNAPCHAT (May 9, 2012), <https://perma.cc/AE97-TZ3L>.

³ *What Does Gen Z Want From Brands?*, SNAP (June 22, 2023), <https://perma.cc/LCM9-69NH>.

39. Today, millions of young people in the United States use Snapchat, including users across Pennsylvania. According to the Pew Research Center, 55% of teens use Snapchat, 48% of them use it “daily,” and 13% say that they are on Snapchat “[a]lmost constantly.”⁴

I. Snap Misleads and Deceives Pennsylvania Consumers About Its Snapchat App.

40. Snap has established its enormous market share among teenage users of social media in part by marketing Snapchat as safe for minor users. It has achieved that market share through numerous misrepresentations and by deceiving consumers, including consumers in Pennsylvania. Specifically, Snap: claims an inaccurate age rating (with related misrepresentations) in the Apple App, Google Play, and Microsoft stores; offers Family Center parental controls that it knows to be ineffective at protecting minors from known mental health harms; and fails to disclose the addictive design features of its app.

A. Age Rating Misrepresentations

41. As part of its intentional marketing of its app as safe, Snap assigns itself a “13+” rating in the Apple App Store and a “T for Teen” rating in the Google Play and Microsoft Stores. Consumers are presented with these age ratings when they download Snapchat on a smartphone.

42. These age ratings are highly deceptive—both because Snapchat hosts enormous amounts of mature content and facilitates dangerous activities and because of the psychologically harmful features of Snapchat as detailed below.

43. Apple, Inc. (“Apple”) requires developers like Snap who submit an app for inclusion in Apple’s App Store to answer an age-rating questionnaire. Apple says that apps that host user-generated content (like Snapchat) “should share the age rating of the highest age-rated

⁴ Michelle Faverio & Olivia Sidoti, *Teens, Social Media and Technology 2024*, PEW RSCH. CTR. (Dec. 12, 2024), <https://perma.cc/YF89-XYZW>.

creator content available in the app.”⁵ Apple warns developers: “We have lots of kids downloading lots of apps,” and app developers like Defendant “have to do [their] part” to keep kids safe. *Id.* Apple also tells developers to “[a]nswer the age rating questions in App Store Connect honestly so that your app aligns properly with parental controls.” *Id.* “If your app is mis-rated,” Apple warns, “customers might be surprised by what they get, or it could trigger an inquiry from government regulators.” *Id.* Apple also informs developers: “you are responsible for complying with local requirements in each territory where your app is available.” *Id.*

44. Apple’s age-rating questionnaire asks *Snap* to describe the content available on the Snapchat app in each of these categories: “Alcohol, Tobacco or Drug Use or References,” “Sexual Content or Nudity,” “Mature/Suggestive Themes,” and “Profanity or Crude Humor.” Based on the self-selected answers to these questions—“none,” “infrequent/mild,” or “frequent/intense”—Apple automatically generates an age-rating, and Snap knows the age rating that its self-reported answers will produce. Apple also offers every app developer (including Snap) the option to self-select a higher age rating than the one Apple suggests based on the app developer’s answers regarding the various categories of content. Snap knows that the age rating it selects for the Snapchat app will be displayed directly to consumers, and it specifically intends for its age rating statements to be communicated directly to Pennsylvania consumers.

45. Snap self-selects the answer “infrequent/mild” for each of the described categories. By doing so, Snap chooses to make the following representations displayed on its page in the App Store:

“Infrequent/Mild Profanity or Crude Humor”

“Infrequent/Mild Mature/Suggestive Themes”

⁵ *App Review Guidelines*, APPLE, <https://perma.cc/3GLR-7NR4>.

“Infrequent/Mild Sexual Content and Nudity”

“Infrequent/Mild Alcohol, Tobacco, or Drug Use or References”

46. Snap’s answers cause Apple to offer a “13+” age rating option (previously “12+”). Apple defines apps with this age rating as apps that “may also contain infrequent mild language, frequent or intense cartoon, fantasy, or realistic violence, infrequent or mild mature or suggestive themes, and simulated gambling, which may not be suitable for children under the age of 12.”⁶ Snap chooses to rate its app “13+.”

47. The next higher (and highest) age rating is “17+.” Apple offers Snap the option to choose this rating, but Snap has never done so. Apple defines apps with the “17+” age rating as apps that “may also contain frequent and intense offensive language, frequent and intense cartoon, fantasy, or realistic violence, and frequent and intense mature, horror, and suggestive themes; plus sexual content, nudity, alcohol, tobacco and drugs which may not be suitable for children under the age of 17.”

48. Snap also makes Snapchat available in the Google Play and Microsoft Stores. Snap responds to the age-rating questions in a way that allows it to claim a “T for Teen” age rating for Snapchat. Snap knows and intends that Google and Microsoft will convey the “T” for “Teen” age rating to consumers on Snap’s behalf. A “T” for “Teen” rating is defined as: “Content is generally suitable for ages 13 and up. May contain violence, suggestive themes, crude humor, minimal blood, simulated gambling and/or infrequent use of strong language.”⁷ By contrast, an “M” for “Mature” rating is defined as: “Content is generally suitable for ages 17 and up. May contain intense violence, blood and gore, sexual content and/or strong language.” Snap also knows and

⁶ *App Store Preview: Age Ratings*, APPLE, <https://perma.cc/2TXS-T39N>.

⁷ *Apps & Games content ratings on Google Play*, GOOGLE PLAY HELP, <https://perma.cc/U3Z6-HGR2> (North America & South America rating standard).

intends that these age-rating representations will be communicated directly to Pennsylvania consumers in the Google and Microsoft app stores.

49. As detailed below, Snap's age-rating representations are deceptive. Snap's age-rating representations both affirmatively misrepresent the Snapchat app and willfully omit material facts about the Snapchat app. The relationship between Snap and its users (or their parents) is such that Snap has a duty to disclose material facts about the content available on the Snapchat app, based on Snap's superior knowledge about its own app and based on objective circumstances.

Profanity or Crude Humor

50. Profanity on Snapchat is neither "infrequent" nor "mild."

51. The Commonwealth's investigation demonstrates that minors are easily able to access videos with frequent and intense profanity. Prior to the filing of this lawsuit, an investigator in the Attorney General's Office set up an account on Snapchat on a new iPhone using a 13-year-old's birthday. Using this 13-year-old's account, the investigator found that minors are easily able to access videos containing frequent and intense profanity, including the following examples:

- A video of a woman lip-syncing to the lyrics: "I said my nigger what you doing stick that dick back in my butt, I be jerking on his penis til the cum drip down his nuts. He man I'm fucking all these mens, I put that dick up in his butt."
- "I'm about this close to getting out the fucking car, BTA belt a fucking ass bro, fucking with me is literally the last thing that should be on your fucking list. Find fucking something safer to do. Play with your mama, not me bro, dead ass. Bout to crash the fuck out because someone almost fucking hit my fucking car. Just because you don't know how to fucking drive, hello."
- A video with animated footage of a grenade and a tank with the text and audio: "What the fuck would fucking happen if you fucking throw a fucking grenade down a fucking tank barrel? Most dumb ass fucking people think the whole fucking Tank will fucking explode, but that's not exactly what the fuck would fucking happen. You fucking see fucking modern tanks have a fucking strong metal door at the back of the fucking barrel called the fucking breach. It says fucking tucking tightly closed to fucking protect the fucking crew. So if a fucking grenade goes down the

fucking barrel, the fucking blast can't reach the fucking soldiers inside. Instead, the fucking explosion would blow out the fucking front of the fucking barrel."

52. Such content is readily available on Snapchat, yet Snap tells Pennsylvania consumers in the App Store that "profanity or crude humor" is "infrequent/mild" on the platform. That is false, deceptive, and misleading.

Alcohol, Tobacco, and Drug Use or References

53. Alcohol, tobacco, and drug use or references on the Snapchat app are neither "infrequent" nor "mild."

54. The Commonwealth's investigation reveals that alcohol, tobacco, and drug use or references appear frequently, are intense, and are visible to minor users on Snapchat. These are just a few of many examples:

- A video of a young man rolling blunts.
- A video of a young man opening a medicine cabinet with the caption, "15 year old me finding grandmas yerks," a slang term for opioid pills.
- A video of a young man rolling blunts with the text: "POV: 14yr old me turning 1g into 3 blunts."
- A video of a man mixing vodka, a Buzzball, Sprite, and Gatorade, then chugging the entire glass, while saying: "And if I just had to get a little bit too drunk on a Wednesday night, and whoopy fucking do, eh, sometimes, rules are meant to be broken. Not always, but hey – we here for a good time, not a long time."
- A video of a home-grown cannabis plant with the caption "White widow for the rubberneckers gonna grow a tree for u sukas."
- A video with the text "Papers are NOT the way," describing why it is better to smoke weed from a glass pipe than to roll it in paper, including because glass allows for a bigger, stronger hit.

55. Other publicly reported examples confirm that drug content on Snapchat is not "mild" or "infrequent." Numerous young people, including young people in Pennsylvania, have

been exposed to drug dealers on Snapchat offering illicit or regulated drugs for sale.⁸ Such content on Snapchat includes posts featuring lists of drugs and their associated prices. Many young people have died from consuming drugs they purchased from dealers on Snapchat.⁹

56. [REDACTED]

57. [REDACTED]

58. Despite the ready availability and severity of drug, alcohol, and tobacco content on Snapchat, Snap tells Pennsylvania consumers in the App Store that “alcohol, tobacco, and drug . . . references” are “infrequent/mild” on the platform. That is false, deceptive, and misleading.

Sexual Content and Nudity

59. Sexual content and nudity on the Snapchat app are neither “infrequent” nor “mild.”

60. The Commonwealth’s investigation revealed abundant sexual content on Snapchat, including:

- A video of a porn star describing her sexual “body count” as 2000 in the past year and a half. A video of a woman “unboxing” her shipment from her university’s “condom fairy,” including flavored condoms and gels.

⁸ See, e.g., Dorothy Sedovic, *Sheriff: Tyler drug dealer used Snapchat to promote sales*, KLTU (Feb. 13, 2020), <https://perma.cc/73FX-CQC5>.

⁹ Katie Kindelan, *Parents whose kids died due to drug overdoses allege Snapchat enables drug dealers*, ABC NEWS (Oct. 18, 2023), <https://perma.cc/F7WY-SPVQ>.

- Repeated paid advertisements for a streaming app featuring clips of sexually-themed content; for example, an advertisement featuring a video clip of a man and woman, with the written text: “With his new superhero system, the three campus goddesses are all eager to give him their V-card,” while in the clip, the woman sits on the man’s lap and asks, “What’s so hard in your pocket, Toby?” They proceed to have what appears to be a sexual encounter. Then another woman drops her panties, they land on the same man’s face, and she says: “Oh my God, my panties fell. Can you bring them up for me?”
- A woman talking directly to the camera, saying: “Look, if you’re going to goon to me, please let me know, because I think that’s so hot. Just thinking about you getting [mouths “off”] to me ... I’m going to be thinking about that all year long.” In the comments, male avatars reply: “Ok I am right now” and “Yes”.
- A video of a woman simulating sex with the text: “I feel so peaceful and relaxed right now” and “What actually relaxes me ..”
- A woman simulating sex with the text: “He said: ‘I have a wife an kids’ *Also him 5 min later*”.

61.

[REDACTED]

[REDACTED]

[REDACTED]

62. Snapchat also has long been referred to as a “sexting” app, where users can send and receive sexually explicit images or videos or other sexual content.

63. Snap’s ephemeral design, which quickly deletes users’ messages, allows and encourages young people to exchange sexual content.

64. Snapchat’s design enables predators to solicit from, and easily exchange sexual content with, minors on the app. Such incidents have been widely reported, including in Pennsylvania.¹⁰

65. In 2023, 23% of young Snapchat users had already had an online sexual interaction, 13% with someone they thought was 18 or older. Of minors who had an online sexual interaction in 2023, 16% had it on Snapchat—more than any other platform.¹¹

66. Snapchat also provides a hunting ground for criminals who benefit from unique Snapchat features to enable them to persuade or con young people into sending sexual images of themselves, and then threaten to release those images unless their victims send more intimate images, engage in sexual acts, or send money.

67. Criminal sexual predators have already used Snapchat to target Pennsylvania minors.¹²

68. [REDACTED]

[REDACTED]

[REDACTED]

69. Even though sexual content and nudity is readily accessible and exchanged on Snapchat, Snap tells Pennsylvania consumers in the App Store that “sexual content and nudity” is “infrequent/mild” on the platform. That is false, deceptive, and misleading.

¹⁰ See, e.g., Press Release, U. S. Att’y’s Off., W. Dist. of Pa., Austin Man Arrested for Alleged Sexual Exploitation of a Minor Through Social Media (Aug. 29, 2025), <https://perma.cc/PQ89-RB89>.

¹¹ *Youth Perspectives on Online Safety, 2023* at 14, THORN (Aug. 2024), <https://perma.cc/ZCR8-E39R>.

¹² See, e.g., WGALTV, *Pennsylvania man accused of sending explicit images to minors on Snapchat* (YOUTUBE, May 18, 2026), <https://www.youtube.com/watch?v=WXAD2ZL9UnA>.

Mature/Suggestive Themes

70. “Mature/suggestive themes” include content related to the topics already described, as well as other complex themes that are suitable only for adult audiences such as suicide, self-harm, eating disorders, and other dangerous behavior.

71. “Mature/suggestive themes” on Snapchat are neither “mild” nor “infrequent.”

72. Snap takes enforcement actions on only a tiny fraction of content and accounts reported by its users for self-harm and suicide content. In the second half of 2024, Snap received a total of 307,660 reports about content or accounts related to “[s]elf-harm & [s]uicide” but took action on less than 5% of those reports.¹³ Snap’s systems were only able to proactively identify 761 instances of self-harm and suicide content in that same six-month period, *globally*.¹⁴ Snapchat also encourages dangerous stunts. For example, one former Snapchat feature, its speed filter, encouraged users to snap while driving at dangerous speeds and caused multiple deaths.¹⁵

73. Even though such posts are readily available on Snapchat, Snap tells Pennsylvania consumers in the App Store that “mature/suggestive themes” are “infrequent/mild” on the platform. That is false, deceptive, and misleading.

B. Snapchat’s High-Risk Design Features Make Its Age Ratings Deceptive.

74. Other aspects of the Snapchat platform make the platform’s age ratings and other claims to being safe for minor users highly deceptive.

My AI

¹³ *Transparency Report*, SNAP (last updated July 1, 2025), <https://perma.cc/8YLA-TLKT> (citation modified).

¹⁴ *Id.*

¹⁵ Bobby Allyn, *Snapchat Ends ‘Speed Filter’ That Critics Say Encouraged Reckless Driving*, NPR (June 17, 2021), <https://perma.cc/D5CW-YK26>.

75. In February 2023, Snap introduced “My AI,” a chatbot feature, for Snapchat+ subscribers.¹⁶ In April 2023, Snap made My AI available to all Snapchat users.

76. Snap made My AI available to Snapchat’s users, including young users, without adequate vetting or safety measures, exposing those users to mature content and “conversations” with the technology.

77. According to a *Washington Post* columnist who tested My AI with a 13-year-old account shortly after it was introduced, the chatbot “gave . . . advice on how to mask the smell of alcohol and pot,” how to deceive the supposed teen’s parents, and “about having sex for the first time with a partner who is 31.”¹⁷

78. Internal Snap documents show that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁶ Geoffrey A. Fowler, *Snapchat Tried to Make a Safe AI. It Chats with Me about Booze and Sex*, WASH. POST (Mar. 14, 2023), <https://perma.cc/PP86-GJWY> (quoting Snap spokesperson Liz Markman).

¹⁷ *Id.*

“Friend” Adding Features

79. Snapchat users can connect with “Friends” on Snapchat in multiple ways, including through the “Find Friends” feature (previously called “Quick Add”). Find Friends connects users who may not know each other in the real world, even when users are not seeking those connections.

80. Find Friends has connected minors with adult strangers seeking to groom, harass, exploit, and even assault them, or to sell them illegal drugs.

81. Adult strangers can target and connect with young users on Snapchat easily in numerous ways, including through searching and through Snapchat’s “Mention” feature. If a user merely “view[s] a Story that has a Snapchatter Mentioned in it, [they] can add that Snapchatter!”¹⁸

82. Adults have groomed, harassed, exploited, assaulted, and sold illicit drugs to minors they connected with on Snapchat because of Snapchat’s recommendations and friend-adding features. For example, an adult man in West Earl Township was charged with sending sexual photos and videos of himself to juvenile boys over Snapchat.¹⁹ In the predator’s chats with the boys, he described himself as a “Pedo Hunter” on Snapchat.²⁰

83. Snap says it has attempted to make it more difficult for predators and drug dealers to find minors on Snapchat. Snap touted these changes and claimed they made Snapchat safe for young users. In this way, Snap sought to give consumers the impression that strangers could not easily target minors on Snapchat, when Snap knew or should have known that was not the case.

84. In 2022, Snap claimed that it made it “impossible to add users under 18 unless there are a certain number of friends in common.”²¹ In 2024, Snap tried again, saying it would “prevent

¹⁸ *How to Add Friends on Snapchat – Snapchat Support*, SNAP, <https://perma.cc/6496-EXY2>.

¹⁹ *Supra* n.12.

²⁰ *Id.*

²¹ Sara Fischer, *Snapchat Making It Harder for Strangers to Find Users Under 18*, AXIOS (Jan. 18, 2022), <https://perma.cc/P9W9-ZJHE>.

delivery of a friend request altogether when teens send or receive a friend request from someone they don't have mutual friends with, and that person also has a history of accessing Snapchat in locations often associated with scamming activity.”²² But it is still possible for predatory adults to find minors on Snapchat, and Snap knows that.

85. This is especially so because Snap knows that the Snapchat age gate (the mechanism it uses to screen out users under 13) is unreliable, and at least some of its safety features have at times depended on the age a user gives at the age gate when signing up to use Snapchat. When a user is prompted to enter their birthday while setting up their account, most social media platforms default to the current day: Snapchat, however, defaults to 18 years prior to the current day. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The app's age gate default of 18 has helped render Snap's efforts to protect young users from predatory adults practically useless for any safety features that depend on accurate age-gate information.

Snap Map

86. Snap Map can display users' locations in real time. Predators and drug dealers use this feature of Snapchat to locate minor victims. Young people also can locate drug dealers on Snap Map, where the dealers post their menus and prices, to buy and arrange delivery of illicit drugs.

²² *New Features to Help Protect Our Community*, SNAP VALUES (June 25, 2024), <https://perma.cc/7WE4-GCK5>.

87. Snap also previously offered Ghost Trails on Snapchat+. Ghost Trails showed users their friends' movements for the prior 24-hour period.

88. Snap wants consumers, especially parents, to believe its policies make young users safe, but they do not.

89. Snap tells parents in its Parent's Guide: "By default, location-sharing is off for all Snapchatters. They have the option to decide to share it on the Map with friends—but never with strangers."²³

90. This is false, deceptive, and misleading. Young users can and do form connections with adult strangers they have not met in real life through Snapchat because of how Snapchat is designed. Once that happens, it is easy for those strangers to find young people on the Snap Map, and vice versa.

91. Additionally, when users submit Snaps to "Our Story," they are sharing them with the broader community, not just their friends. Those Snaps may show up on the Snap Map.

92. The ease with which strangers can follow and find each other in real time on Snap Map is dangerous for young people. It is not a feature consistent with a 13+ or T for Teen age rating.

Ephemeral Content

93. Snapchat's baseline ephemerality also deprives law enforcement of critical evidence to pursue charges against ill-meaning adults who prey on young people on and through Snapchat. A drug dealer, for example, can find a teen on Snapchat and sell him or her a lethal fentanyl-laced pill, but when the teen dies and the messages are deleted from Snap's servers, law enforcement has nothing from Snapchat connecting the dealer with the teen's death.

²³ *Parent's Guide: Snapchat's Family Center*, SNAPCHAT (2022), <https://perma.cc/UJP9-JDS8>.

94. Minors use Snapchat for sexting as well as exchanging content featuring underage alcohol and drug use. Predators target young people for sextortion scams, drug deals, and grooming, knowing that Snap will erase from existence the illicit material they exchange. Snapchat’s ephemerality gives young people a false sense of security in engaging with other users—even strangers—up to and including feeling less inhibited to seek illicit drugs or share nude images of themselves.

95. In reality, as Snap knows, predators can take screen shots or otherwise save in perpetuity “disappearing” content without their targets’ knowledge. This content can then be, and is, used to extort young people, pressure and coerce them into sending more explicit material, or illicitly store their images or sell them to pedophiles, among other things.

96. Snapchat also features a “My Eyes Only” option to keep Snaps “extra private!”²⁴ Snaps saved in My Eyes Only are protected by a passcode, and Snap itself cannot access them. The feature encourages youth to hide problematic Snaps from their parents and enables predators to retain illicit content—including child sexual abuse material—away from even Snap itself.

C. Snap’s Deceptive Claims and Omissions About the Family Center

97. Snap has lagged considerably and unjustifiably behind other social media companies in creating parental controls for the Snapchat app. While competitors like Google and Instagram created parental oversight tools as early as 2017, Snap only made its parental controls feature, called the Family Center, available on August 9, 2022.

98. Snap then touted the parental controls that it makes available in its Family Center in an effort to deflect from the many dangers associated with using Snapchat. For example, Snap tells parents that the company “take[s] [its] responsibility to help protect teens on Snapchat

²⁴ *How does My Eyes Only work? – Snapchat Support*, SNAP, <https://perma.cc/X796-KRZF>.

extremely seriously” and claims that through the Family Center it “arm[s] parents with in-app safety tools and resources to help their teens use Snapchat safely.”²⁵ Snap also markets the Family Center as a set of “tools and resources to help parents get more insight into who their teens are friends with on Snapchat and who they have been messaging with.”²⁶ Such statements are deceptive and contain material omissions; despite Snap’s claims to the contrary, the Family Center fails to provide parents with meaningful tools that could be used to effectively mitigate the risks and dangers of Snapchat use described above.

99. As Snap internally recognizes, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

100. Snap has also designed the Family Center parental controls to make them extremely burdensome for parents to use. A parent who wishes to use Family Center parental controls must download the Snapchat app onto his phone, set up a Snapchat account, and request permission from the child to link the parent’s account with the child’s account— [REDACTED]

[REDACTED] Once Family Center controls are set up, the parent must remember to regularly check the app to monitor the information provided there, [REDACTED]

[REDACTED]

[REDACTED]

²⁵ *Snapchat Family Safety Hub*, SNAPCHAT, <https://perma.cc/FM3T-RNBW>.

²⁶ SNAPCHAT, *Introducing Snapchat’s Family Center* at 0:06-10 (YOUTUBE, Aug. 9, 2022), <https://perma.cc/7WHE-TLVG>; <https://www.youtube.com/watch?v=CcUATXoLyzQ>.

101. Even when parents successfully set up and monitor Family Center parental controls, these limited controls fail to protect teens from the myriad dangers of using Snapchat. Family Center functions are largely limited to allowing parents to see who their teen is “Friends” with on Snapchat and who they have been communicating with. But this information does not illuminate much, given the sheer number of “Friends” teens connect with on Snapchat. The Family Center gives parents no insight into their teens’ exposure to harmful or mature material like nude images or drug content, no ability to set privacy controls for their teens, no ability to set time limits for their teens, and no ability to discern when their teens bypass parental controls, for example, by using secondary accounts. Moreover, teens, who are often more familiar with technology than their parents, can easily evade even the limited parental controls that are available in the Family Center.

II. Snapchat Is Intentionally Addictive But Snap Deceives Pennsylvanians About That Fact.

102. Something has gone wrong in the lives of American teenagers. Since the early 2010s, studies examining adolescent well-being have documented increasing symptoms of depression, loneliness, and unhappiness, with rates of major depression among teenagers more than doubling.

103. The early 2010s were also a turning point for American teens’ use of technology. Teen smartphone ownership more than tripled between 2011 and 2015. Smartphones with front-facing cameras (which make it easier to take selfies) were introduced in 2010, and over the ensuing years teenagers’ use of social media exploded. By 2017, 78% of 8th graders reported that they used social media almost every day.²⁷

²⁷ *Teens and Tech: Executive Summary*, INST. FOR FAMILY STUDIES (Oct. 2022), <https://perma.cc/NBQ6-DJC5>.

104. A robust body of research shows that social media use is a significant contributor to the nationwide teen mental health crisis. Increased use of social media among teens is associated with increased rates of depression. Teenagers who are heavy social media users are also more likely to report that they have hurt themselves on purpose. Experiments on social media use further support the same conclusion, showing that teens who give up or reduce their social media use have less anxiety and depression compared to those who do not. Social media use exacerbates existing mental health harms in teenagers, and causes such harms for at least some teenagers.

105. Snapchat in particular is a social media app that is contributing to—and sometimes causing—teenage mental health harms, including as a result of its intentional design features, which it knows pose risks to teenage users.

106. One of the major mechanisms through which social media use, including Snapchat use, causes mental health problems in teens is through behavioral addiction. A behavioral addiction occurs when someone fails to resist engaging in behaviors or experiences that are compelling in the short term despite harming their well-being in the long run. When a teenager becomes addicted to social media, it crowds out other activities that promote psychological well-being and healthy cognitive development such as time with family and friends, physical activity, and sleep.

107. Excessive and addictive use of social media by young people is a direct result of the intentional design choices of the owners of certain social media platforms, including Snap. As the U.S. Surgeon General explained in a recent advisory, social-media platforms deploy features like “[p]ush notifications, autoplay, infinite scroll, quantifying and displaying popularity (i.e., ‘likes’), and algorithms that leverage user data to serve content recommendations” that lead to

“excessive use and behavioral dysregulation.”²⁸ Those features “overstimulate the reward center in the brain” and “trigger pathways comparable to addiction,” resulting in “changes in brain structure similar to changes seen in individuals with substance use or gambling addictions.”²⁹ The Surgeon General noted that “we are experiencing a national youth mental health crisis” and called on lawmakers to “act swiftly” to “limit[] the use of [addictive] features” by platforms.³⁰

108. Snapchat uses a wide variety of addictive features in its app. First, Snapchat uses infinite scrolling, which allows new content to constantly load, giving the appearance of an endless page. Infinite scrolling is harmful and promotes behavioral addiction because it eliminates natural stopping cues that would otherwise end episodes of use. Without such stopping cues, people tend to allow an episode of use to continue by default, and research shows that infinite scrolling contributes to overuse of social media.

109. Both Stories and Spotlight present content via infinite scrolling, and internal Snap documents show that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Snap maintains this feature of its platform even though an internal Snap document [REDACTED]

[REDACTED]

²⁸ *Social Media and Youth Mental Health: The U.S. Surgeon General’s Advisory* at 9, OFF. SURGEON GEN. (2023), <https://perma.cc/3GPW-XDBY>.

²⁹ *Id.*

³⁰ *Id.* at 13, 15.

110. Second, Snapchat uses push notifications, which are alerts that appear on a user's phone screen when they are not using Snapchat that are designed to entice the user back onto the app. Push notifications exploit users' natural tendency to seek and attend to environmental feedback, serving as distractors that monopolize attention. Young users are especially sensitive to these triggers and less able to control their response and resist reopening the app. Snapchat sends push notifications to users, regardless of age, frequently and at all hours of the day and night. They disrupt young people at school and interfere with homework, time with family and friends, and sleep. Push notifications are one way that Snapchat encourages harmful nighttime use among teenagers. Excessive use of Snapchat at nighttime has also been shown to have an adverse and clinically significant effect on children's and teens' sleep, thereby interfering with cognitive development, performance in school, and overall well-being. Snapchat keeps minors on the app late at night, decreasing the amount and quality of their sleep. Insufficient sleep causes a slew of health problems for minors, including neurological deficiencies, dysregulated emotional functioning, heightened risk of suicide, and many other mental health harms.³¹

111. Third, Snapchat uses personal interactive metrics that display the number of times other users have clicked a button to show their reaction to content or have shared content. Such interactive metrics are powerful sources of feedback that drive engagement by activating neural

31 See, e.g., *Health Advisory on Social Media Use in Adolescence*, AM. PSYCH. ASS'N, (May 2023), <https://perma.cc/2MQN-4MN6>; Seung-Schik Yoo et al., *A Deficit in the Ability to Form New Human Memories Without Sleep*, NATURE NEUROSCIENCE 385 (2007); see also Megan A. Moreno & Anna F. Jolliff, *Depression and Anxiety in the Context of Digital Media*, in *Handbook of Adolescent Digital Media Use and Mental Health*, CAMBRIDGE UNIV. PRESS, 217–41 (2022); Hugues Sampasa-Kanyinga et al., *Use of Social Media Is Associated with Short Sleep Duration in a Dose-Response Manner in Students Aged 11 to 20 years*, 107 ACTA PAEDIATRICA 694, 694–700 (2018); Eti Ben Simon & Matthew P. Walker, *Sleep Loss Causes Social Withdrawal and Loneliness*, 9 NATURE COMM'NS 1, 4 (2018), <https://perma.cc/R4YV-Y9CW>; Els van der Helm et al., *Sleep Deprivation Impairs the Accurate Recognition of Human Emotions*, 33 SLEEP 335, 335–42 (2010), <https://perma.cc/HV3W-SRQ5>.

circuits in the brain that are associated with reward processing. Research has found that adolescents show increased sensitivity to feedback provided through interactive metrics and that their engagement in social media is driven more strongly by this feedback than is adults' engagement.

112. Snapchat includes a variety of interactive personal metrics, including a button on the Spotlight page that shows the number of times a video has been reposted as well as a “Snapscore”—a number that appears on each user’s public profile that reflects the type and volume of engagements the user has undertaken on Snapchat. The higher a user’s Snapscore, the higher that user’s engagement on Snapchat.

113. Perhaps the most problematic interactive metric on Snapchat is Snapstreaks. A Snapstreak is a designation Snapchat gives to conversations between users who exchange at least one snap per day for more than three days. When users enter a Snapstreak, a fireball emoji appears next to their chat. When users are about to lose their streak (meaning one user has not sent a snap in almost 24 hours), Snapchat warns them.

114. Snapstreaks can cause and contribute to compulsive use and social comparison in young users who are particularly vulnerable to pressures to continue Snapstreaks. Young users often view Snapstreaks as evidence of the strength of their real-life friendships, and they feel immense pressure to continue them for fear of losing their streak and potentially upsetting their real-life friends.

115. Internal Snap documents recognize that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Rather than taking steps to address the harmful effects of Snapstreaks on the platform’s users, Snap directly monetizes this abusive aspect of its product by offering to restore users’ lost Snapstreaks for a fee. [REDACTED]

[REDACTED]

[REDACTED]

116. Fourth, Snapchat uses auto-play video which allows a video to play without any action on the part of the user. Like infinite scrolling, auto-play of videos contributes to addictiveness by eliminating stopping cues and encouraging extended viewing sessions.

[REDACTED]

[REDACTED]

[REDACTED]

117. Fifth, Snap incorporates ephemeral content in its app. Snap markets disappearing messages as one of the core features of Snapchat: at Snapchat, “Delete is our default.”³² This means most messages sent over Snapchat are automatically deleted once they have been viewed or have expired. When Snap deletes messages, it deletes them from the app and from Snapchat servers.

118. The disappearing nature of Snapchat content contributes to the addictive nature of the app for young people. This aspect of Snapchat encourages users to open the app and keep coming back to it constantly, and it preys on minor users who are especially sensitive to a fear of missing content and social interaction.

119. Sixth, Snap also uses various gimmicks known as “Charms” to gamify users’ relationships with the goal of encouraging them to increase their usage of Snapchat.

³² *When does Snapchat delete Snaps and Chats? – Snapchat Support*, SNAP, <https://perma.cc/JC5P-XCTD>.

120. Snap tells users that “Charms are fun, special mementos that celebrate your friendships! Charms are added based on your interactions and relationships with your friends.”³³ Snap says that “Charms are special surprises that are added based on your relationships with your friends and how you interact with each other. It’s about having fun.”³⁴

121. Like Snapstreaks, Charms are a way for young people to evaluate their real-life friendships on Snapchat’s terms. The more users interact with each other on Snapchat, the more “Charms” they receive. And, because Charms are “surprises,” users are encouraged to keep up their engagement to see what new Charms might appear. Charms may even appear if users have not been communicating to specifically encourage them to restart their engagement with each other.

122. Prior to Charms, Snapchat had Trophies, which were emojis that users could earn by engaging in certain tasks on Snapchat. The trophies were visible to users’ friends. Like Charms, Trophies were designed to encourage more engagement on Snapchat and contributed to compulsive use.

123. Seventh is perhaps Snapchat’s most extreme method of user manipulation: the app’s Friend Solar System. The Friend Solar System is a feature available to users who pay for a Snapchat+ subscription. Snap explains it this way:

As a Snapchat+ subscriber, you’ll see a ‘Best Friends’ badge with a gold ring around it on someone’s Friendship Profile. ‘Best Friends’ means they’re among the eight friends you Snap and Chat with the most. Tapping on the badge will show you which planet you are in their Solar System, with each planet representing a different position in their Best Friends list.³⁵

³³ *What are Charms on Snapchat? – Snapchat Support*, SNAP, <https://perma.cc/88MY-NPQG>.

³⁴ *Id.*

³⁵ *How do Friend Solar Systems work? – Snapchat Support*, SNAP, <https://perma.cc/Q3AH-7WV3>.

124. This means that young people will be able to see if (according to Snapchat) they are as valuable to their “friends” as their “friends” are to them. A user’s friend might show up as Mercury in his solar system but only be Jupiter or Neptune in the friend’s solar system.³⁶ This feature causes tremendous stress for young people, who are acutely and uniquely vulnerable to social pressure and validation.³⁷ As one teen commented to the *Wall Street Journal*, “A lot of kids my age have trouble differentiating best friends on Snapchat from actual best friends in real life.” As such, young people reportedly have “seen friendships splinter and young love wither due to the knowledge that someone else ranks higher on the app.” *Id.*

125. In response to public backlash from parents and others, Snap turned the friend solar system off by default. But it is still available to users who pay the fee for a subscription to Snapchat+.

126. Finally, Snap uses algorithms that it fine-tunes to recommend content that maximizes the amount of time users spend on the platform. These algorithms are designed to keep users on Snapchat for as long as possible, regardless of the consequences for users’ mental health and well-being, and they promote behavioral addiction among young users.

127. Other Snapchat features also affect young users’ mental health. Snapchat is well known for its “lenses”—photo filters that Snap describes as “[augmented reality] experiences [that] transform the way you look and the world around you!”³⁸

128. Some Snapchat lenses fundamentally and realistically alter the appearance of a user’s skin and facial features in a manner akin to plastic surgery or other cosmetic procedures.

³⁶ *Id.*

³⁷ Julie Jargon, *Snapchat’s Friend-Ranking Feature Adds to Teen Anxiety*, WALL ST. J. (Mar. 30, 2024), <https://perma.cc/VSK6-N97X>.

³⁸ *How do I use Lenses on Snapchat? – Snapchat Support*, SNAP, <https://perma.cc/A223-A6HL>.

Such beauty-oriented face lenses cause many users to become unsatisfied with their real faces, leading to anxiety and sometimes driving users to seek real-life cosmetic procedures. This form of body dysmorphic disorder has been dubbed “Snapchat dysmorphia.”³⁹

129. Snapchat’s beauty lenses cause emotional damage to younger users, particularly girls. Young people are still developing and forming their identities, and they are vulnerable to the negative impacts of this face-altering technology.

130. The use of beauty lenses that emulate plastic surgery has led to disastrous consequences for younger users. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

131. Snap bills Snapchat as unique among its social media platform peers in ways that supposedly make it safer and more authentic. For example, a Snap media campaign touts Snapchat’s supposed lack of features that promote social comparison: “Less likes. More love” and “Less Social Media. More Snapchat.”⁴⁰ Snap goes so far as to say it “was built as an antidote to social media.”⁴¹ Such claims are highly deceptive in light of the manipulative design features of Snapchat that promote behavioral addiction and encourage teens to compare themselves, their relationships, and their social standing to others. Snap also deceptively fails to warn users about these dangerous and psychologically damaging aspects of its product. The relationship between

³⁹ Elle Hunt, *Faking It: How Selfie Dysmorphia Is Driving People To Seek Surgery*, THE GUARDIAN (Jan. 23, 2019), <https://perma.cc/FY85-RABV>.

⁴⁰ *Less Likes. More Love*, SNAP NEWSROOM (June 3, 2024), <https://perma.cc/WY9Q-BXDP>.

⁴¹ *Hearing on Online Protection for Children, Before the Sen. Com., Sci. & Transp. Subcomm.* at 1:26–31 (Oct. 26, 2021), <https://bit.ly/3IoXzpR> (Statement of Jennifer Stout, Vice President of Global Public Policy, Snap, Inc.).

Snap and its users (or their parents) is such that Snap has a duty to disclose material facts about the addictiveness of the Snapchat app, based on Snap's superior knowledge about its own app and based on objective circumstances.

III. Snap's Misrepresentations Are Relevant and Capable of Deceiving Pennsylvania Consumers.

132. Snap's deception causes substantial harm to Pennsylvania consumers.

133. Parents check the age rating of apps and associated content descriptors before allowing their children to download and use them. Parents may supervise their children's devices to see which apps their children are downloading or use parental controls to prevent their children from downloading apps with particular age ratings.

134. Snap's representations and acts are particularly important to parents and other Snapchat users because once a Snapchat user sees harmful content on the app, it cannot be "unseen." Similarly, once a young person experiences a harmful or dangerous feature or interaction, the effects can be long-lasting.

135. Snap knows that parents care about what their teens will be exposed to on Snapchat. Snap's misrepresentations seek to prevent parents who are unfamiliar with Snapchat's addictive features and the mature content it hosts from developing such concerns. They seek to convince parents that Snapchat is safe for their teens, so they will download Snapchat and allow their teens to do so.

136. Consumers, particularly parents, also care whether an app is addictive and could lead to compulsive, excessive, or otherwise harmful use, particularly where such use immerses young people in content and interactions that can lead to or worsen mental health concerns, disordered eating, and other concerning behaviors.

137. Parents also care about safety and parental-control features and tools. Parents who seek to use these controls expect them to do what Snap says they will do—help them keep their children safe on Snapchat.

CAUSES OF ACTION

COUNT I

Snapchat’s Misrepresentations About Platform Age-Appropriateness in Age Ratings and Elsewhere Are Deceptive

Violations of the Pennsylvania Unfair Trade Practices and Consumer Protection Law

138. The Commonwealth repeats and incorporates by reference each allegation contained in the preceding paragraphs as if fully set forth herein.

139. Section 201-2(3) of the UTPCPL defines “trade” and “commerce” to mean the “advertising, offering for sale, sale or distribution of any services and any property, tangible or intangible, real, personal or mixed, and any other article, commodity, or thing of value wherever situate, and includes any trade or commerce directly or indirectly affecting the people of this Commonwealth.”

140. Snap engaged and continues to engage in trade and commerce in the Commonwealth of Pennsylvania by, among other acts, marketing and offering in exchange for valuable consideration its social media platform to Pennsylvania consumers and hosting and profiting from advertisements on its platform.

141. Unfair or deceptive acts or practices in the conduct of any trade or commerce as defined by subclauses (i) through (xxi) of Section 201-2(4) of the UTPCPL are declared unlawful, and whenever the Attorney General has reason to believe that any person is using or is about to use any method, act, or practice declared unlawful, Section 201-4 of the UTPCPL authorizes the

Attorney General to bring an action against such person to restrain these methods, acts, or practices.

142. Snap's acts and practices described herein constitute unfair or deceptive acts or practices, as prohibited by Section 201-3 of the UTPCPL as defined by Section 201-2(4), 201-3, and elsewhere.

143. Snap has engaged in and is engaging in false, misleading, and deceptive acts and practices in its representations and advertisements regarding the content available on Snapchat, as prohibited by Section 201-3 of the UTPCPL as defined by Section 201-2(4), 201-3, and elsewhere.

144. Snap inaccurately and deceptively reports to the Apple App Store that the Snapchat platform contains either "none," "infrequent/mild," or "infrequent" mature content, including "Alcohol, Tobacco, or Drug Use or References," "Sexual Content or Nudity," "Mature/Suggestive Themes," "Mature or Suggestive Themes," and "Profanity or Crude Humor." Snap knows when making these misrepresentations that they will appear on Snapchat's page on the App Store, along with a representation that Snapchat is rated "12+" or "13+," for consumers to see when deciding whether to download Snapchat (or permit minors in their care to do so). Snap also advertises the 12+ or 13+ rating to consumers in other public statements.

145. However, such content is abundant on Snapchat and cannot reasonably be considered either "infrequent" or "mild." This content includes alcohol-, tobacco-, and drug-related material, sexual content and nudity, and mature themes that Snap deliberately permits and has permitted. The Snapchat app does not have the characteristics of, and does not meet the appropriate standard for, an app with "infrequent/mild" or "infrequent" content in these categories or a 12+ or 13+ rating. Snap knows this, and it intends not to offer the app consistent with the way it is advertised.

146. Snap has made further public statements that overstate and otherwise misrepresent the safety of the Snapchat app for minor users, particularly as it relates to the abundant mature, adult-only content on the app.

147. Snap inaccurately and deceptively represents to the Google Play and Microsoft Stores that the Snapchat platform is appropriate for minors to obtain a “T” for “Teen” age rating. Snap knows that the false, deceptive, and misleading age rating of “T” for “Teen” appears on Snapchat’s pages on the Google Play Store for consumers to see when deciding whether to download Snapchat (or permit minors in their care to do so). Snap, however, has long deliberately permitted mature, adult-only content on Snapchat.

148. Snap’s misleading and deceptive practices are highly relevant to the decisions of users to download Snapchat and the decisions of parents to let minors use Snapchat, because Snapchat users and their parents care about the type of content available on Snapchat when deciding whether to use, or to let minors use, the Snapchat app. Snap’s misrepresentations have the capacity or tendency to deceive Pennsylvania consumers.

149. Snap’s acts and practices described herein constitute unfair or deceptive acts or practices, as prohibited by Section 201-3 of the UTPCPL as defined by Section 201-2(4)(v) (“Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits or quantities that they do not have”); (vii) (“Representing that goods or services are of a particular standard, quality or grade, or that goods are of a particular style or model, if they are of another”); and (xxi) (“Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or misunderstanding”).

150. Snap knew or should have known that its conduct was unfair and deceptive as to the app’s content and age ratings, which is internally known to Snap.

PRAYER FOR RELIEF

WHEREFORE, the Commonwealth requests that the Court:

- A. Enter judgment in favor of the Commonwealth and against Snap;
- B. Declare that Snap's actions violate the UTPCPL;
- C. Temporarily and permanently enjoin Snap to prevent future violations of the UTPCPL;
- D. Award civil penalties for Snap's willful violations;
- E. Award the Commonwealth its costs and fees, including expert-witness expenses; costs incurred in pursuing this action and investigation, including prejudgment and post-judgment interest at the highest lawful rates;
- F. Grant such other and further legal or equitable relief as justice requires.

COUNT II

Snapchat's Addictive Design Features are Deceptive

Violations of the Pennsylvania Unfair Trade Practices and Consumer Protection Law

151. The Commonwealth repeats and incorporates by reference each allegation contained in the preceding paragraphs as if fully set forth herein.

152. Snap has engaged in and is engaging in false, misleading, and deceptive acts and practices by failing to disclose that the Snapchat app is addictive and contributes to compulsive or excessive use especially for minors, to induce users to download and use Snapchat or allow minors in their care to do so. Snap deliberately designed Snapchat to be addictive and knows that it causes a range of mental health problems in users. It employs numerous coercive and addictive features that draw users, especially minors, to the app and keep them on the app as long as possible to increase Snap's revenue and profits at the expense of the well-being of users. Snap knows that minor users especially are susceptible to Snapchat's addictive features. Each of those features

discussed in this Complaint manipulates and preys upon minor users' developing brains and inability to effectively self-regulate their app use. Snap knows that these features are excessive and compulsive.

153. Snap has not informed consumers at any time that Snapchat is addictive and causes a range of mental health problems, that it was designed to be addictive, or that minors are particularly susceptible to these features and qualities.

154. Snap's deceptive practices are highly relevant to the decisions of users to download Snapchat and the decisions of parents to let minors use Snapchat, and are intended to induce these behaviors, because Snapchat users and parents care whether the app is addictive. Had Pennsylvania consumers, particularly Pennsylvania parents, known the true nature and extent of Snapchat's addictive design, qualities, and features, they would not have downloaded the app or permitted minors in their care to do so.

155. Snap's design, marketing, and offering of an app specifically designed to addict young users is an unfair practice, is unconscionable, and is contrary to public policy with no countervailing benefit.

156. Snap's deception and misrepresentations about the addictiveness of its app conceal information that is highly relevant to consumers, particularly parents choosing whether to let their teenagers use the Snapchat app. Snap's deception and misrepresentations about the addictiveness of its app have the capacity or tendency to deceive Pennsylvania consumers.

157. Snap knew or should have known that its conduct was unfair and deceptive as to the app's addictiveness, which has been heavily researched and publicized and is internally known to Snap.

158. Snap’s acts and practices described herein constitute unfair or deceptive acts or practices, as prohibited by Section 201-3 of the UTPCPL as defined by Section 201-2(4)(v) (“Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits or quantities that they do not have”); (vii) (“Representing that goods or services are of a particular standard, quality or grade, or that goods are of a particular style or model, if they are of another”); and (xxi) (“Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or misunderstanding”).

159. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of Snap’s violations of the UTPCPL. Absent injunctive relief by this Court, Snap is likely to continue to injure consumers and harm the public interest.

PRAYER FOR RELIEF

WHEREFORE, the Commonwealth requests that the Court:

- A. Enter judgment in favor of the Commonwealth and against Snap;
- B. Declare that Snap’s actions violate the UTPCPL;
- C. Temporarily and permanently enjoin Snap to prevent future violations of the UTPCPL;
- D. Award civil penalties for Snap’s willful violations;
- E. Award the Commonwealth its costs and fees, including expert-witness expenses; costs incurred in pursuing this action and investigation, including prejudgment and post-judgment interest at the highest lawful rates;
- F. Grant such other and further legal or equitable relief as justice requires.

COUNT III

Snapchat's Addictive and High-Risk Design Features are Unfair

Violations of the Pennsylvania Unfair Trade Practices and Consumer Protection Law

160. The Commonwealth repeats and incorporates by reference each allegation contained in the preceding paragraphs as if fully set forth herein.

161. Snap's unfair acts include but are not limited to Snap's choice to design the Snapchat app to include features known to be high-risk and to promote compulsive, prolonged, and unhealthy use by children and teens.

162. Snap has deliberately designed its app to be addictive, especially to minors, and as a result, its product is unfair to consumers. For example, the Snapchat app features infinite scrolling, frequent push notifications, and auto-play video, which Snap knows tend to extend a user's time on the app and coerce the user to stay longer than intended. Snap has created numerous personal interactive metrics like the Snapscore, Snapstreaks, and the Friend Solar System to addict users and keep them returning to the app daily or using it more frequently and for longer periods than they otherwise would. Snap employs algorithms to select which content to show a particular user with the goal of keeping the user on the app longer. Snap has created "Charms" to gamify usage of the app and offers beauty lenses, which artificially alter a user's appearance in ways that are not attainable. Snap intentionally creates these design features, which are addictive for minor users. They are known to promote mental health harms and are unfair to minor users.

163. Other Snapchat features pose a high risk to the safety of minor users, which Snap knows. Snapchat's friend-adding features, the Snap Map with location sharing, and the My AI chatbot are high-risk design features of Snapchat. Snapchat's ephemeral content also poses a high

risk to minors because it interferes with the ability of law enforcement to intervene and act to protect minors in emergencies.

164. Minors cannot use the Snapchat app and avoid its high-risk or addictive features, which are embedded in how the app functions. Snap relies on addictive features to keep minor users on the app for long periods of time in order to profit from larger advertising revenue at the expense of minor users' mental health. Snapchat's addictive features are known to promote, exacerbate, and cause mental health harms in minors, including but not limited to depression and suicide, anxiety, eating disorders, social media addiction, risky sexual behaviors, use of drugs and alcohol, and sleep deficiency. Snapchat's high-risk design features are known to put minors' safety at risk, resulting in various types of harm, including but not limited to grooming, harassment, illicit drug sales, and other unwanted adult contact.

165. Snap knew or should have known that its conduct was unfair as to the app's addictiveness and safety, which has been heavily researched and publicized and is internally known to Snap.

166. Snap's aforementioned acts and practices constitute unfair trade practices that violate Section 201-3, as defined by Section 201-2(4) of 73 P.S. Specifically, the aforementioned acts and practices: (1) offend public policy; (2) are immoral, unethical, oppressive, or unscrupulous; and/or (3) cause substantial injury to consumers.

167. Snap's acts and practices described herein constitute unfair acts or practices, as prohibited by Section 201-3 of the UTPCPL as defined by Section 201-2(4)(v) ("Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits or quantities that they do not have"); (vii) ("Representing that goods or services are of a particular standard, quality or grade, or that goods are of a particular style or model, if they are of another");

and (xxi) (“Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or misunderstanding”).

168. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of Snap’s violations of the UTPCPL. Absent injunctive relief by this Court, Snap is likely to continue to injure consumers and harm the public interest.

PRAYER FOR RELIEF

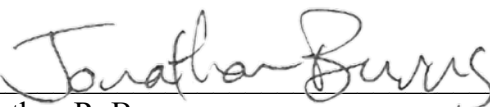
WHEREFORE, the Commonwealth requests that the Court:

- A. Enter judgment in favor of the Commonwealth and against Snap;
- B. Declare that Snap’s actions violate the UTPCPL;
- C. Temporarily and permanently enjoin Snap to prevent future violations of the UTPCPL;
- D. Award civil penalties for Snap’s willful violations;
- E. Award the Commonwealth its costs and fees, including expert-witness expenses; costs incurred in pursuing this action and investigation, including prejudgment and post-judgment interest at the highest lawful rates;
- F. Grant such other and further legal or equitable relief as justice requires.

Respectfully submitted,

DAVID W. SUNDAY, JR.
ATTORNEY GENERAL
COMMONWEALTH OF PENNSYLVANIA

Date: August 25, 2026

By 
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*Applications For Admission Pro Hac Vice Forthcoming

Attorneys for the Commonwealth of Pennsylvania

IN THE PHILADELPHIA COURT OF COMMON PLEAS

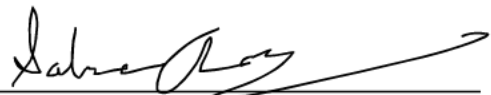
COMMONWEALTH OF PENNSYLVANIA,	:	CIVIL ACTION
OFFICE OF ATTORNEY GENERAL,	:	
By Attorney General David W. Sunday, Jr.,	:	EQUITY
	:	
Plaintiff,	:	
	:	
v.	:	No.
	:	
SNAP INC. :	:	
	:	
Defendant.	:	
	:	

VERIFICATION

I, Sabrina Andrejak, hereby state that I am a Consumer Protection Agent for the Commonwealth of Pennsylvania, Office of Attorney General, Bureau of Consumer Protection, and I am authorized to make this verification on behalf of the Plaintiff in the within action. I hereby verify that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge or information and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsifications to authorities.

Date: 08/24/2026

By: 
Sabrina Andrejak
Consumer Protection Agent

IN THE PHILADELPHIA COURT OF COMMON PLEAS

COMMONWEALTH OF PENNSYLVANIA,	:	CIVIL ACTION
OFFICE OF ATTORNEY GENERAL,	:	
By Attorney General David W. Sunday, Jr.,	:	EQUITY
	:	
Plaintiff,	:	
	:	
v.	:	No.
	:	
SNAP INC. :	:	
	:	
Defendant.	:	
	:	

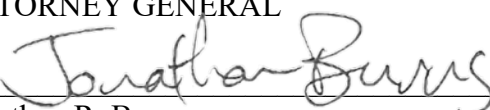
CERTIFICATE OF COMPLIANCE

I, Jonathan Burns certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents, differently than non-confidential information and documents.

COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ATTORNEY GENERAL

DAVID W. SUNDAY, JR.
ATTORNEY GENERAL

Date: August 25, 2026

By 
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