

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PASCO COUNTY, FLORIDA

OFFICE OF THE ATTORNEY GENERAL,
STATE OF FLORIDA,
DEPARTMENT OF LEGAL AFFAIRS,

Plaintiff,

CASE NO.: 24 CA 3193 CAA XES

v.

META PLATFORMS, INC. and
INSTAGRAM, LLC,

Defendants.

PLAINTIFF'S MOTION FOR TEMPORARY INJUNCTION

TABLE OF CONTENTS

Introduction	1
Factual Background	3
I. Florida’s Lawsuits Against Meta	3
A. The Attorney General’s Challenges to Meta’s Deceptive, Unfair, and Unconscionable Acts	3
B. Florida’s Individual and School-District Lawsuits against Meta.....	6
II. New Mexico’s Resolution of Meta’s Violations.....	11
III. Bellwether Personal-Injury Judgment Against Meta	12
IV. Meta’s Recent Agreement to Injunctive Relief in Other Lawsuits	13
Legal Standard	19
Argument	20
I. There Is a Substantial Likelihood the Attorney General Will Succeed on the Merits of Its Claims.	21
A. Meta engaged in deceptive acts.	21
1. Meta engaged in deception by affirmative misrepresentation.....	23
2. Meta engaged in deception by omission.	40
B. Meta engaged in unfair and unconscionable acts.	44
1. Meta’s appearance-altering filters are unfair to Young Users.....	46
2. Meta’s quantification and public display of likes and comments are unfair to Young Users.	47
3. Meta’s deployment of Infinite Scroll is unfair to Young Users.	48
4. Meta’s use of Autoplay is unfair to Young Users.....	49
5. Meta’s use of Reels is unfair to Young Users.	49
6. Meta’s use of ephemeral and time-sensitive content (Stories and Live) is unfair to Young Users.	51
7. Meta’s permitting and promoting ownership of multiple accounts by a single user (finstas) is unfair to Young Users.....	52
8. Meta’s deployment of notifications and push features is unfair to Young Users.	53
9. Meta’s development of ineffective time-management tools is unfair to Young Users.	54
II. Meta Should Be Enjoined.	56
A. Meta should be enjoined to make changes similar to those in the multidistrict-litigation settlement.	56

1. Meta must verify user age and remove users under the age of 14.....	57
2. Meta must modify its Platforms to reduce addictive, injurious, and problematic use by Teen Users.....	57
B. Meta should be enjoined to make changes similar to those ordered in New Mexico.	58
1. Meta should remedy past deceptions with clear statements about its Platforms.	58
2. Meta must verify user age and remove users under the age of 14.....	59
3. Meta must modify its Platforms to reduce addictive, injurious, and problematic use by Teen Users.....	60
C. Meta should be enjoined to make additional changes needed to fully protect Florida’s children.	61
1. Meta should be prohibited from making further deceptive statements or omissions and required to remedy past deceptions.....	61
2. Meta must verify user age and remove users under the age of 14.....	63
3. Meta must modify its Platforms to reduce addictive, injurious, and problematic use by Teen Users.....	63
CONCLUSION.....	78

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Angelo v. Parker</i> , 275 So. 3d 752 (Fla. 1st DCA 2019)	<i>passim</i>
<i>Baptist Health v. Murphy</i> , 226 S.W.3d 800 (Ark. 2006)	46
<i>Basulto v. Hialeah Auto.</i> , 141 So. 3d 1145 (Fla. 2014)	45
<i>Coleman v. CubeSmart</i> , 328 F. Supp. 3d 1349 (S.D. Fla. 2018)	23
<i>E-Racer Tech, LLC v. Off. of Att’y Gen.</i> , 198 So. 3d 1107 (Fla. 4th DCA 2016).....	19
<i>FTC v. NPB Advert., Inc.</i> , 218 F. Supp. 3d 1352 (M.D. Fla. 2016)	22
<i>FTC v. Pointbreak Media, LLC</i> , 376 F. Supp. 3d 1257 (S.D. Fla. 2019)	45, 55
<i>FTC v. Roca Labs, Inc.</i> , 345 F. Supp. 3d 1375 (M.D. Fla. 2018)	45
<i>Gavron v. Weather Shield Mfg., Inc.</i> , 819 F. Supp. 2d 1297 (S.D. Fla. 2011)	23
<i>Gordon v. Rosenblum</i> , 393 P.3d 1122 (Or. 2017).....	45, 46, 55
<i>Millennium Commc’ns & Fulfillment, Inc. v. Off. of the Att’y Gen.</i> , 761 So. 2d 1256 (Fla. 3d DCA 2000)	19, 22
<i>Off. of Att’y Gen. v. Bilotti</i> , 267 So. 3d 1 (Fla. 4th DCA 2019)	20, 22, 56
<i>Off. of Att’y Gen. v. Commerce Com. Leasing, LLC</i> , 946 So. 2d 1253 (Fla. 1st DCA 2007)	22
<i>PNR, Inc. v. Beacon Prop. Mgmt., Inc.</i> , 842 So. 2d 773 (Fla. 2003)	22, 44, 55

<i>Porsche Cars N. Am., Inc. v. Diamond</i> , 140 So. 3d 1090 (Fla. 3d DCA 2014)	45, 46, 55
<i>Simmons v. Ford Motor Co.</i> , 592 F. Supp. 3d 1262 (S.D. Fla. 2022)	22
<i>In re Soc. Media Adolescent Addiction/Pers. Injury Products Liab.</i> <i>Litig.</i> , 838 F. Supp. 3d 979 (N.D. Cal. 2026)	13, 23, 44
<i>New Mexico ex rel. Torrez v. Meta Platforms, Inc.</i> , No. D-101-CV-2023-02838 (N.M. 1st Jud. Dist. Ct. Aug. 6, 2026)	<i>passim</i>
<i>Zamber v. Am. Airlines, Inc.</i> , 282 F. Supp. 3d 1289 (S.D. Fla. 2017)	22
Statutes	
§ 60.08, Fla. Stat.	20
§ 501.202, Fla. Stat.	20, 21, 22, 44
§ 501.204, Fla. Stat.	<i>passim</i>
§ 501.207, Fla. Stat.	19, 20
§ 501.1736, Fla. Stat.	57
§ 501.2075, Fla. Stat.	11
N.M. Stat. Ann. § 57-12-3	11

INTRODUCTION

“It’s a social comparison app, fuc**** get used to it.” Ex. 1 at 5.¹ That was the sentiment among Meta employees discussing Project Daisy, Meta’s clandestine study of whether turning off like counts would mitigate the extraordinary harm that Instagram and Facebook (“the Platforms”) cause children and teenagers. *Id.* at 5. That was the sentiment when Meta knew full well that “[s]ocial comparison” on its Platforms caused children “self-esteem [issues], anxiety, and insecurity.” Ex. 2, Source No. 1. That sentiment permeates many of Meta’s actions in recent years, which have ranged from lying to Congress and consumers, to deleting research about child sexual exploitation occurring on its Platforms, to deliberately designing products that addict and endanger users under the age of 18 (“Young Users”).

Those actions have drawn a cascade of lawsuits. One has already produced a \$942 million total judgment against Meta in a state with 10% of Florida’s population and with civil penalties capped at half the amount of Florida’s penalties.² To avoid the full weight of the public backlash, Meta recently announced a settlement with fifty-one states and territories on August 26, 2026, resolving the settling States’ claims for an \$11.66 billion—with payments spread over a decade—and a set of

¹ Page numbers in all exhibit citations, except trial transcripts, are to the AG page numbers imposed on the individual Exhibits contained within the Exhibit bundles.

² See Findings of Fact, Conclusions of Law, and Judgment, Order, and Decree of the Court, *New Mexico ex rel. Torrez v. Meta Platforms, Inc.*, No. D-101-CV-2023-02838, at 5, 46 (N.M. 1st Jud. Dist. Ct. Aug. 6, 2026) (attached as Ex. 3).

injunctive provisions.³ Florida did not join this settlement, which does not go far enough to protect children from the consequences of Meta’s deceptions and exposure to the products designed to addict them. Besides, for a company of Meta’s size—roughly \$1.86 trillion—the settlement’s financial and injunctive terms amount to a mere slap on the wrist, will be cynically viewed as the cost of doing business, and in any event will not prevent this kind of behavior going forward.

Meta’s actions, in designing a product secretly intended to exploit the psychological vulnerabilities of children, are deceptive, unfair, and unconscionable, in clear violation of Florida law. The multidistrict settlement shows that Meta *can* make the changes needed to remedy those harms. Florida law says that it *must* do so pending trial. Thus, the Attorney General seeks a temporary injunction that covers the three most egregious aspects of Meta’s behavior. First, it will prohibit Meta from making further deceptive statements and omissions in Florida. Second, it will require Meta to verify user age and remove underage users in Florida. Finally, it will require Meta to modify its Platforms to reduce addictive, injurious, and problematic use by Young Users in Florida.

³ Consent Decree, *In re Social Media Adolescent Addiction/Pers. Injury Products Liab. Litig.* (“*In re Social Media*”), No. 4:22-MD-03047-YGR, Dkt. No. 3451 (N.D. Cal. Aug. 26, 2026) (attached as Ex. 4); Settlement Agreement § VI.C, Ex. B at 99, *In re Social Media*, No. 22-MD-03047, Dkt. No. 3451-1 (N.D. Cal. Aug. 26, 2026) (attached as Ex. 5).

FACTUAL BACKGROUND

I. Florida's Lawsuits Against Meta

A. The Attorney General's Challenges to Meta's Deceptive, Unfair, and Unconscionable Acts

1. Plaintiff, Office of the Attorney General, State of Florida, Department of Legal Affairs ("Attorney General"), sued Meta Platforms, Inc. and Instagram, LLC ("Meta") to protect Florida's children from Meta's "unconscionable acts or practices, and unfair or deceptive acts or practices" in violation of the Florida Deceptive and Unfair Trade Practices Act, Sections 501.201–.213, Florida Statutes (2026) ("FDUTPA" or "the Act"). Compl. ¶ 186 (quoting § 501.204, Fla. Stat. (2026)).

2. Meta operates multiple social media platforms, including Facebook and Instagram. *Id.* ¶¶ 18–22. Meta's core business model is to monetize users' data, time, and attention by increasing user engagement on the Platforms. *Id.* ¶¶ 31–53. No two user experiences are the same: the Platforms tailor each feed to the personal data Meta collects from its users. *Id.* ¶ 34. While users do not pay money for those services, the Platforms are anything but free—users pay by allowing Meta to collect and use their personal data, which requires users to invest their time and attention. *Id.* ¶¶ 35, 37–38. Meta then sells that data, time, and attention to advertisers, who target users by age, gender, location, interests, and other personal identifiers. *Id.* ¶¶ 37, 41.

3. Young Users are central to that model and a prized demographic. *Id.*

¶¶ 48–53.⁴ Advertisers pay a premium to reach them because they are more easily influenced and may become lifelong customers. *Id.* ¶ 52.

4. So Meta targets Young Users, and that targeting comes at a high cost. *Id.* ¶¶ 2–4. Sources ranging from the United States Surgeon General to lawsuits to independent studies to Meta’s own research demonstrate that Meta caused Young Users extensive harm, including anxiety, depression, self-harm, sleep deprivation, eating disorders, exposure to unwanted sexual advances, and tragically, suicide. *Id.* ¶¶ 3, 5–11, 111–21, 137–38; *see* Ex. 6 at 5 (“There are increasing concerns among researchers, parents and caregivers, young people, healthcare experts, and others about the impact of social media on youth mental health.”).

5. Yet to maximize profit and keep Young Users engaged, Meta deliberately and publicly misrepresents and omits information about how unsafe its Platforms are for Young Users, misleading the public. Compl. ¶¶ 149, 152, 155–59, 162–63, 167–68, 172, 180–81.

6. Meta knew what its Platforms were doing to Young Users. It learned this from outside researchers and from its own studies, including its Bad Experiences and Encounters Framework (“BEEF”) and its Tracking Reach of Integrity Problems Survey (“TRIPS”). *Id.* ¶¶ 124–40.

7. Meta deceived the public about its Platforms’ effects on Young Users through eight categories of affirmative misrepresentation:

a. the Platforms are not psychologically or physically harmful for

⁴ Meta often protests that users under 13 do not have access to the Platforms. That is demonstrably false. *Infra* at 6, 34–35.

Young Users, *id.* ¶¶ 148–51, 192(A),

- b. the Platforms are not addictive and not designed to cause extensive or compulsive use, *id.* ¶¶ 152–57, 192(B),
- c. Meta protects Young Users from harmful content on its Platforms, *id.* ¶¶ 158–59, 192(C),
- d. Meta effectively excludes users under the age of 13 from its Platforms, *id.* ¶¶ 160–61, 192(D),
- e. Meta prioritizes user well-being and safety over user engagement and company growth, *id.* ¶¶ 31, 167–73, 192(E),
- f. Meta does not place a monetary value on Young Users, *id.* ¶¶ 48–53, 172–73, 192(F),
- g. Meta does not restrict access to internal research findings, *id.* ¶¶ 174–81, 192(G), and
- h. Meta uses internal research findings to improve product safety on a regular basis, *id.* ¶¶ 182–83, 192(H).

8. In addition to peddling affirmative falsehoods, Meta also misled by omission and false-light portrayals. It buried its negative findings and, instead, published misleading statistics in its Community Standards Enforcement Report (“CSER”), manufacturing a false sense of transparency. *Id.* ¶¶ 137–140. And it cherry-picked statistics about time-management tools knowing that, if given the full picture, the public would realize those tools were ineffective. *Id.* ¶¶ 106–09, 136.

9. To attract and keep Young Users, Meta also designed its Platforms to exploit the undeveloped adolescent brain’s susceptibility to addictive design and employed ineffective time-management tools that would do little to reduce use. *Id.* ¶¶ 73–109, 141–47, 192–93. Meta’s unfair design features and tools include:

- a. appearance-altering filters, *id.* ¶¶ 73–81,
- b. likes and comments, *id.* ¶¶ 82–85, 141–47,

- c. infinite Scroll, *id.* ¶¶ 86–90,
- d. autoplay, *id.* ¶¶ 91–92,
- e. reels, *id.* ¶¶ 93–94,
- f. ephemeral or time-sensitive content (*e.g.*, Instagram “Stories” and Facebook “Live”), *id.* ¶¶ 95–98,
- g. multiple accounts facilitated for single users, *id.* ¶¶ 99–101,
- h. notifications, *id.* ¶¶ 102–05, and
- i. ineffective time-management tools, *id.* ¶¶ 106–09.

10. Meta engages in unconscionable acts by prioritizing its own growth over the safety of the vulnerable Young Users it targets. *See, e.g., id.* ¶¶ 75–79, 185–87.

11. In sum, the Attorney General alleges that Meta collects, processes, and uses Young Users’ data for its own financial gain. Meta misleads Young Users, their parents, Congress, and the media—affirmatively and by omission—with assurances that its Platforms are safe. And it designs those Platforms, unfairly and unconscionably, to exploit Young Users’ vulnerabilities.

12. Thus, in December 2024, the Attorney General filed this action alleging that Meta committed deceptive, unfair, and unconscionable acts that violated FDUTPA. *Id.* ¶¶ 184–96. The Attorney General seeks injunctive relief, all available legal and equitable relief, and civil penalties. *Id.* at 55.

B. Florida’s Individual and School-District Lawsuits against Meta

13. Examples of Meta’s targeting of Florida’s children are easily found in the mass of lawsuits filed by individuals and school districts. *Id.* ¶¶ 8–11.

14. The individual lawsuits describe children in Florida who began using Meta’s Platforms as young as 7 or 8 years old. Compl. ¶¶ 4, 11, *Richardson v. Meta*,

No. 4:26-cv-02175-YGR (N.D. Cal. Feb. 25, 2026), Dkt. No. 1 (attached as Ex. 7); Compl. ¶¶ 4, 11, *J.R. on behalf of M.J. v. Meta*, No. 4:26-cv-01322-YGR (N.D. Cal. Jan. 19, 2026), Dkt. No. 1 (attached as Ex. 8); Compl. ¶¶ 4, 11, *Tabacsko v. Meta*, No. 4:26-cv-01317-YGR (N.D. Cal. Jan. 13, 2026), Dkt. No. 1 (attached as Ex. 9).

15. Those children went on to suffer from depression, sleep disorders, anxiety, body dysmorphia, anorexia, bulimia, sexual abuse, exploitation through child sexual abuse material (“CSAM”), self-harm, and suicidal ideation. Compl. ¶ 12, *C.G. Individually and on behalf of S.G. v. Meta*, No. 4:24-cv-09407-YGR (N.D. Cal. Dec. 24, 2024), Dkt. No. 1 (attached as Ex. 10); Compl. ¶ 12, *Lebofsky v. Meta*, No. 4:23-cv-02088-YGR (N.D. Cal. Apr. 28, 2023), Dkt. No. 1 (attached as Ex. 11).⁵

⁵ See Compl. ¶ 12, *U.M. v. Meta*, No. 4:26-cv-07141-YGR (N.D. Cal. July 13, 2026), Dkt. No. 1 (attached as Ex. 12); Ex. 7, Compl. ¶ 12, *Richardson*, No. 4:26-cv-02175-YGR; Compl. ¶ 12, *Ehrlich v. Meta*, No. 4:26-cv-01880-YGR (N.D. Cal. Feb. 9, 2026), Dkt. No. 1 (attached as Ex. 13); Ex. 8, Compl. ¶ 12, *J.R.*, No. 4:26-cv-01322-YGR; Ex. 9, Compl. ¶ 12, *Tabacsko*, No. 4:26-cv-01317-YGR; Compl. ¶ 12, *Amaral v. Meta*, No. 4:26-cv-00813-YGR (N.D. Cal. Dec. 31, 2025), Dkt. No. 1 (attached as Ex. 14); Compl. ¶ 12, *Anderson v. Meta*, No. 4:25-cv-10709-YGR (N.D. Cal. Nov. 25, 2025), Dkt. No. 1 (attached as Ex. 15); Compl. ¶ 12, *Henderson v. Meta*, No. 4:25-cv-06369-YGR (N.D. Cal. July 2, 2025), Dkt. No. 1 (attached as Ex. 16); Compl. ¶ 12, *Thomas v. Meta*, No. 4:25-cv-02434-YGR (N.D. Cal. Mar. 10, 2025), Dkt. No. 1 (attached as Ex. 17); Compl. ¶ 12, *Larson v. Meta*, No. 4:23-cv-04253-YGR (N.D. Cal. Aug. 21, 2023), Dkt. No. 1 (attached as Ex. 18); Compl. ¶ 12, *Popolizio v. Meta*, No. 4:23-cv-01887-YGR (N.D. Cal. Apr. 19, 2023), Dkt. No. 1 (attached as Ex. 19); Compl. ¶ 12, *Page v. Meta*, No. 4:22-cv-06124-YGR (N.D. Cal. Apr. 4, 2023), Dkt. No. 13 (attached as Ex. 20); Compl. ¶ 12, *Downings v. Meta*, No. 4:22-cv-06388-YGR (N.D. Cal. Mar. 31, 2023), Dkt. No. 16 (attached as Ex. 21); Compl. ¶ 12, *Salmons v. Meta*, No. 4:22-cv-06386-YGR (N.D. Cal. Mar. 31, 2023), Dkt. No. 13 (attached as Ex. 22); Compl. ¶ 12, *Jamerson v. Meta*, No. 4:22-cv-06384-YGR (N.D. Cal. Mar. 30, 2023), Dkt. No. 15 (attached as Ex. 23); Compl. ¶¶ 183, 193–207, *Mitchell v. Meta*, No. 4:22-cv-06387-YGR (N.D. Cal. Aug. 4, 2022), Dkt. No. 1 (attached as Ex. 24); Compl. ¶¶ 62–65, *Charles v. Meta*, No. 4:22-cv-06375-YGR (N.D. Cal. June 6, 2022), Dkt. No. 1 (attached as Ex. 25).

16. Some children attempted suicide. Ex. 13, Compl. ¶ 12, *Ehrlich*, No. 4:26-cv-01880-YGR; Ex. 18, Compl. ¶ 12, *Larson*, No. 4:23-cv-04253-YGR; Ex. 11, Compl. ¶ 12, *Lebofsky*, No. 4:23-cv-02088-YGR; Ex. 22, Compl. ¶ 12, *Salmons*, No. 4:22-cv-06386-YGR; Ex. 23, Compl. ¶ 12, *Jamerson*, No. 4:22-cv-06384-YGR; Ex. 25, Compl. ¶ 65, *Charles*, No. 4:22-cv-06375-YGR.

17. Some children died by suicide. Ex. 18, Compl. ¶¶ 8, 12, *Larson*, No. 4:23-cv-04253-YGR; Ex. 11, Compl. ¶¶ 8, 12, *Lebofsky*, No. 4:23-cv-02088-YGR; Ex. 19, Compl. ¶¶ 8, 12, *Popolizio*, No. 4:23-cv-01887-YGR; Ex. 24, Compl. ¶¶ 183, 193–207, *Mitchell*, No. 4:22-cv-06387-YGR.

18. As described here and in the Attorney General’s Complaint, Compl. ¶¶ 8–11, an extensive number of Florida school districts, serving more than 1.5 million students, have sued Meta—along with Snap, TikTok, and YouTube—in the federal multidistrict litigation and in California’s coordinated proceeding.⁶

⁶ Compl. ¶ 5, *Okeechobee Cnty. Sch. Dist. v. Meta*, No. 4:26-cv-09995-YGR (N.D. Cal. Sep. 8, 2026), Dkt. No. 1 (attached as Ex. 26); Compl. ¶ 5, *Miami-Dade Cnty. Pub. Schs. Dist. v. Meta*, No. 4:23-cv-05257-YGR (N.D. Cal. Aug. 5, 2026), Dkt. No. 32 (attached as Ex. 27); Compl. ¶ 5, *Sch. Bd. of Marion Cnty. v. Meta*, No. 4:26-cv-03554-YGR (N.D. Cal. Apr. 24, 2026), Dkt. No. 1 (attached as Ex. 28); Compl. ¶ 5, *Sch. Bd. of Monroe Cnty. v. Meta*, No. 4:26-cv-01394-YGR (N.D. Cal. Feb. 17, 2026), Dkt. No. 1 (attached as Ex. 29); Compl. ¶ 5, *Sch. Bd. of Martin Cnty. v. Meta*, No. 4:25-cv-08931-YGR (N.D. Cal. Oct. 17, 2025), Dkt. No. 1 (attached as Ex. 30); Compl. ¶ 5, *Sch. Bd. of Indian River Cnty. v. Meta*, No. 4:25-cv-04301-YGR (N.D. Cal. May 20, 2025), Dkt. No. 1 (attached as Ex. 31); Compl. ¶ 5, *Sch. Bd. of Leon Cnty. v. Meta*, No. 4:25-cv-04273-YGR (N.D. Cal. May 19, 2025), Dkt. No. 1 (attached as Ex. 32); Compl. ¶ 5, *Sch. Dist. of Manatee Cnty. v. Meta*, No. 4:25-cv-04275-YGR (N.D. Cal. May 19, 2025), Dkt. No. 1 (attached as Ex. 33); Compl. ¶ 5, *Sch. Bd. of Santa Rosa Cnty. v. Meta*, No. 4:25-cv-04286-YGR (N.D. Cal. May 19, 2025), Dkt. No. 1 (attached as Ex. 34); Compl. ¶ 5, *Sch. Bd. of Charlotte Cnty. v. Meta*, No. 4:25-cv-00188-YGR (N.D. Cal. Jan. 6, 2025), Dkt. No. 1 (attached as Ex. 35); Compl. ¶ 5, *Sch. Bd. of DeSoto Cnty. v. Meta*, No. 4:25-cv-00190-YGR (N.D. Cal. Jan. 6, 2025), Dkt. No. 1

19. Those districts allege that Instagram and Facebook, together with the other defendants’ apps, employ “defective and dangerous product features that are engineered to induce more use by young people—creating an unreasonable risk of compulsive use and addiction.”⁷

20. Because of these apps, students are depressed, anxious, sleepless, disordered in their eating, and harming themselves—and school boards are forced to divert money and staff away from teaching to assist suffering students.⁸

(attached as Ex. 36); Compl. ¶ 5, *Sch. Bd. of Hillsborough Cnty. v. Meta*, No. 4:24-cv-01573-YGR (N.D. Cal. Mar. 14, 2024), Dkt. No. 1 (attached as Ex. 37); Compl. ¶ 20, *Sch. Bd. of Polk Cnty. v. Meta*, No. 4:23-cv-05740-YGR (N.D. Cal. Nov. 7, 2023), Dkt. No. 1 (attached as Ex. 38); Compl. ¶ 18, *Sch. Bd. of Escambia Cnty. v. Meta*, No. 4:23-cv-05475-YGR (N.D. Cal. Oct. 3, 2023), Dkt. No. 1 (attached as Ex. 39); Compl. ¶ 24, *Broward Cnty. Sch. Bd. v. Meta*, No. 4:23-cv-01061-YGR (N.D. Cal. Mar. 23, 2023), Dkt. No. 28 (attached as Ex. 40); Compl. ¶¶ 20–21, *Sch. Bd. of Citrus Cnty. v. Meta*, No. 23STCV22209 (Cal. Super. Ct. Sep. 14, 2023) (attached as Ex. 41); Compl. ¶ 20, *Sch. Bd. of Orange Cnty. v. Meta*, No. 23STCV19344 (Cal. Super. Ct. Aug. 14, 2023) (attached as Ex. 42); Compl. ¶ 20, *Sch. Bd. of Alachua Cnty. v. Meta*, No. 23STCV17997 (Cal. Super. Ct. July 31, 2023) (attached as Ex. 43); Compl. ¶¶ 20–26, *Sch. Bd. of Okaloosa Cnty. v. Meta*, No. 23STCV16975 (Cal. Super. Ct. July 19, 2023) (attached as Ex. 44); Compl. ¶¶ 20–21, *Liberty Cnty. Sch. Dist. v. Meta*, No. 23STCV08004 (Cal. Super. Ct. Apr. 11, 2023) (attached as Ex. 45).

⁷ Ex. 39, Compl. ¶ 48, *Escambia*, No. 4:23-cv-05475-YGR; *accord* Ex. 38, Compl. ¶ 51, *Polk*, No. 4:23-cv-05740-YGR; Ex. 40, Compl. ¶¶ 154, 160–62, *Broward*, No. 4:23-cv-01061-YGR; Ex. 41, Compl. ¶ 50, *Citrus*, No. 23STCV22209; Ex. 42, Compl. ¶ 51, *Orange*, No. 23STCV19344; Ex. 43, Compl. ¶ 51, *Alachua*, No. 23STCV17997; Ex. 44, Compl. ¶ 57, *Okaloosa*, No. 23STCV16975; Ex. 45, Compl. ¶ 52, *Liberty*, No. 23STCV08004.

⁸ Ex. 27, Compl. ¶ 186, *Miami-Dade*, No. 4:23-cv-05257-YGR; Ex. 38, Compl. ¶¶ 233–35, *Polk*, No. 4:23-cv-05740-YGR; Ex. 39, Compl. ¶¶ 232–34, *Escambia*, No. 4:23-cv-05475-YGR; Ex. 40, Compl. ¶¶ 113–15, *Broward*, No. 4:23-cv-01061-YGR; Ex. 41, Compl. ¶¶ 230–32, *Citrus*, No. 23STCV22209; Ex. 42, Compl. ¶¶ 234–36, *Orange*, No. 23STCV19344; Ex. 43, Compl. ¶¶ 234–36, *Alachua*, No. 23STCV17997; Ex. 44, Compl. ¶¶ 237–39, *Okaloosa*, No. 23STCV16975; Ex. 45, Compl. ¶¶ 231–33, *Liberty*, No. 23STCV08004.

21. The schools have hired counselors, social workers, and psychologists; rewritten student handbooks and school policies; repaired property destroyed by students acting out; and confiscated phones in classrooms. Ex. 27, Compl. ¶ 186(a)–(o), *Miami-Dade*, No. 4:23-cv-05257-YGR; Ex. 39, Compl. ¶¶ 233–34, *Escambia*, No. 4:23-cv-05475-YGR; Ex. 40, Compl. ¶¶ 113–14, *Broward*, No. 4:23-cv-01061-YGR; Ex. 42, Compl. ¶¶ 234–35, *Orange*, No. 23STCV19344; Ex. 43, Compl. ¶¶ 234–35, *Alachua*, No. 23STCV17997.

22. Teachers have been pulled from instruction to notify parents of behavioral problems and to investigate threats made against schools over social media. Ex. 27, Compl. ¶ 186(l)–(m), *Miami-Dade*, No. 4:23-cv-05257-YGR; Ex. 38, Compl. ¶ 235, *Polk*, No. 4:23-cv-05740-YGR; Ex. 39, Compl. ¶ 234, *Escambia*, No. 4:23-cv-05475-YGR; Ex. 42, Compl. ¶ 235, *Orange*, No. 23STCV19344; Ex. 43, Compl. ¶ 235, *Alachua*, No. 23STCV17997. Florida’s schools cannot keep pace with treating the harms caused by the Platforms. Ex. 39, Compl. ¶ 235, *Escambia*, No. 4:23-cv-05475-YGR; Ex. 40, Compl. ¶ 115, *Broward*, No. 4:23-cv-01061-YGR; Ex. 41, Compl. ¶ 232, *Citrus*, No. 23STCV22209; Ex. 43, Compl. ¶ 236, *Alachua*, No. 23STCV17997; Ex. 44, Compl. ¶ 239, *Okaloosa*, No. 23STCV16975.

23. Thus, Florida’s schools seek long-term funding to redress record rates of depression, anxiety, and suicidal ideation suffered by the children they serve. Ex. 38, Compl. ¶ 13, *Polk*, No. 4:23-cv-05740-YGR; Ex. 39, Compl. ¶ 13, *Escambia*, No. 4:23-cv-05475-YGR; Ex. 41, Compl. ¶ 13, *Citrus*, No. 23STCV22209; Ex. 42, Compl. ¶ 13, *Orange*, No. 23STCV19344; Ex. 43, Compl. ¶ 13, *Alachua*, No. 23STCV17997; Ex.

44, Compl. ¶ 13, *Okaloosa*, No. 23STCV16975; Ex. 45, Compl. ¶ 13, *Liberty*, No. 23STCV08004.

24. These lawsuits are largely ongoing, and new complaints are still being filed. There is no end in sight to the harm Meta has caused Florida’s children.

II. New Mexico’s Resolution of Meta’s Violations

25. New Mexico has litigated similar claims all the way to judgment. Its Attorney General sued Meta under the New Mexico Unfair Practices Act (“UPA”)⁹ and for public nuisance. Ex. 3, Judgment ¶ 1, *New Mexico*, No. D-101-CV-2023-02838. The court bifurcated the case: a jury tried the UPA claims from February 2 to March 24, 2026, and the court tried the nuisance claims from May 4 to May 22, 2026. *Id.* at 1, ¶ 8.

26. The jury found for New Mexico on the UPA claim. *Id.* ¶¶ 9, 11. It found 75,000 violations and assessed “the highest possible penalty of \$5,000.00” on each, for a verdict of \$375 million. *Id.* ¶ 12.¹⁰ The court then found for New Mexico on the nuisance claims because:

the evidence at trial proved that design elements, such as autoplay, infinite scroll, “like counts,” and push notifications create a product that, particularly for adolescent users, is highly rewarding psychologically and neurochemically. As a result, for many, it is irresistibly compelling to start scrolling and very difficult to stop or abstain from its use.

⁹ This law is similar to FDUTPA, barring “[u]nfair or deceptive trade practices and unconscionable trade practices in the conduct of any trade or commerce are unlawful.” N.M. Stat. Ann. § 57-12-3.

¹⁰ That statutory cap is doubled in Florida, which allows civil penalties of \$10,000 per violation. § 501.2075, Fla. Stat. (2026).

Ex. 3, Judgment ¶ 161, *New Mexico*, No. D-101-CV-2023-02838; *see id.* ¶¶ 90–96. The court further found that “algorithmic content recommendations can create harmful feedback loops and ‘rabbit hole’ users” and that like counts “provide a potentially harmful focus for adolescent users.” *Id.* ¶ 162.

27. The court ordered abatement that included a \$567 million abatement fund on top of the jury’s civil penalties, including a five-year abatement period with semiannual compliance reporting, and specific platform changes. *Id.* ¶¶ 121, 131–32. Among those platform changes, Meta must (a) request proof of age from New Mexico users whom its systems predict to be under 13 and mark unverified accounts for deletion within 30 days; (b) attempt to build a dedicated under-13 prediction model within two years; (c) treat users whom it cannot age-estimate as either under 13 or under 18; and (d) build a school reporting portal for suspected underage accounts. *Id.* ¶ 143(a)–(i). Meta must also eliminate push notifications to users under 18 from 10 p.m. to 7 a.m. daily and from 8 a.m. to 3 p.m. on academic-year weekdays; hide like counts by default for all users under 18, overridable only with a parent’s permission; and cap cumulative use at 90 hours per month across Facebook and Instagram. *Id.* ¶¶ 168–70.

III. Bellwether Personal-Injury Judgment Against Meta

28. Meta also faces suit from individual plaintiffs, school districts, and local governmental entities throughout the country, including approximately 3,300 additional lawsuits in a Judicial Council Coordinated Proceeding (“JCCP”) in California. Ex. 2, Source No. 2.

29. In the first bellwether trial from the JCCP, the individual plaintiff, K.G.M., accused Meta of claims including general negligence and negligence for the failure to warn of the dangers of Instagram. Compl. ¶¶ 177–79, *P.F. v. Meta*, No. 23SMCV03371, (Cal. Super. Ct. July 25, 2023) (attached as Ex. 46). K.G.M. alleged that she began using social media at the age of 10 even though her mother forbade it and tried to block her access. *Id.* ¶ 140.

30. K.G.M.’s use of Instagram (and other social media platforms) coincided with a decline in her mental health and led to her experiencing both bullying and sextortion. *Id.* ¶¶ 141, 145. When K.G.M. reported the sextortion attempt, “Meta did nothing” and “allowed the predatory user to continue harming” her, “including through the use of explicit images of a minor child.” *Id.* ¶ 145.

31. The jury found Meta was negligent in its design or operation of Instagram and that Meta failed to adequately warn that the design or operation of Instagram was dangerous when used by a minor. Judgment on the Verdict at 2, *P.F. v. Meta*, No. 23SMCV03371, (Cal. Super. Ct. Apr. 7, 2026) (attached as Ex. 47). It awarded K.G.M. \$2.1 million in compensatory damages, and an additional \$2.1 million in punitive damages—totaling to \$4.2 million in damages from Meta. *Id.* at 3–4.

IV. Meta’s Recent Agreement to Injunctive Relief in Other Lawsuits

32. Meta faced a multidistrict lawsuit on these issues in federal court in California. *See In re Social Media*, 838 F. Supp. 3d 979, 993–1000 (N.D. Cal. 2026). Individual States brought parallel proceedings in state courts across the country. *See* Ex. 2, Source No. 3.

33. On August 26, 2026, fifty-one states and territories (excluding Florida and New Mexico) settled with Meta, resolving the settling States’ claims, including all claims under the States’ Unfair and Deceptive Acts and Practices statutes. Ex. 4, Consent Decree at 2–3, *In re Social Media*, No. 22-MD-03047-YGR. Meta was so enthusiastic about this settlement agreement that it took out full-page advertisements for four days straight in “The New York Times, Washington Post, Los Angeles Times, Wall Street Journal and New York Post,” in which it urged competitors like TikTok and YouTube to “make comparable efforts to strengthen social media protections for teens.” Ex. 2, Source No. 4.

34. The settlement requires Meta to pay financial remuneration and to submit to injunctive relief.

35. Meta made over \$200 billion in revenue in 2025. Ex. 2, Source No. 5.

36. It is valued at \$1.855 trillion. Ex. 2, Source No. 6.

37. Yet the settlement requires Meta to pay only \$11.66 billion, in ten installments over a decade. Ex. 5, Settlement Agreement § VI.C, Ex. B at 99, *In re Social Media*, No. 22-MD-03047-YGR. If certain intricate conditions are met—including industry-wide adoption of restrictions resembling the settlement’s injunctive relief—Meta will pay an additional \$5.02 billion over ten years. *Id.* §§ I.U, VI.D, Ex. B at 99.

38. For Meta, \$11.66 billion is 5.8% of its annual revenue. In two days, Meta generates \$1.16 billion in revenue, which is the same amount it will have to pay *all* of the settling states *annually* for the next decade.

39. The settlement also spares Meta’s reputation and grants it a transparent tax break by requiring the settling States, whenever possible, to report at least half of the payments they receive to the IRS as “compensatory restitution and remediation” instead of civil penalties. *Id.* § VI.G.3.a.

40. The settlement also includes injunctive-relief provisions. Those provisions are designed to reduce the harm to children (in the settling States) that stem from the same deceptive, unfair, and unconscionable acts that led the Attorney General to file this lawsuit. *Id.* § II.

41. The settlement divides minors into two groups—those under age 13, “U13,” and those aged 13 through 17, “Teen Users.” *Id.* §§ I.GGG, HHH. It treats the two groups very differently.

42. For U13 users, the settlement is limited in scope. Meta must find and remove them, full stop. *Id.* § II.A.6.b.i–ii. These users receive no further protections because they (in theory) may not access Meta’s Platforms. If an account does not demonstrate the user’s age, Meta must assume the user is U13. *Id.* § II.A.6.b.i.B. The settlement sets no target for the number of U13 users to be removed, focusing on deadlines for implementing software capable of detecting U13 users and benchmarks for that software. *Id.* §§ II.A.1.–2., II.A.6.a. Instead, Meta sets its own annual target reflecting a “reasonably achievable number,” and the only apparent consequence of missing it is explaining the shortfall to an auditor. *Id.* § II.A.6.b.ii.C–F.

43. For Teen Users, protections vary by factors including age and time of day. Meta must adopt and apply an age-assurance framework to every user in the

settling States to assess whether they are U13 or Teen Users. *Id.* § II.A.1. New users whose ages have not yet been assessed receive default Teen User protections if they state their age as under 18. *Id.* § II.A.10.a. If they state their age as over 18, they are still shielded from bad actors and inappropriate content recommendations for 14 days. *Id.* If their age is not assessed within 14 days, they are treated as Teen Users regardless of stated age. *Id.* § II.A.10.b.

44. Meta must default Teen Users’ accounts to a night mode from 12 a.m. to 6 a.m. that limits Teen Users’ access solely to messaging and settings and reduces notifications. *Id.* § II.B.2.a. Meta must default Teen Users to a two-hour cap on cumulative daily use across its Platforms, and must interrupt use with mandatory pauses at 60 and 90 minutes and a notice every 15 minutes of continuous use. *Id.* §§ II.B.3.a, 5.a. This cap does not extend to “Longform Content, engaging in messaging, or accessing settings.” *Id.* § II.B.3.a.i. Parents can lessen or strengthen these restrictive settings. *Id.* §§ II.B.2.a.v, 3.a.iv, 4.c, 5.a.

45. Meta must identify secondary accounts so that a minor cannot evade the limits by opening a second account. *Id.* § II.B.6. Meta must also offer a non-personalized feed and prompt Teen Users to select it every 90 days, *id.* § II.C.2; hide like and reaction counts from Teen Users by default and disable cosmetic-procedure filters for them entirely, *id.* § II.D; implement content policies to protect Teen Users from bullying and harassment, *id.* § II.E.1.b; default Teen Users into content settings appropriate for their age, *id.* § II.E.1.a, .d, .f; respond to a Teen User’s report of harmful content within six hours in at least 90% of cases, *id.* § II.E.5.b; and give

Supervising Parents¹¹ usage data, notice when an adult first messages their child, and alerts on repeated searches for suicide, self-harm, or eating-disorder content, *id.* § II.G. Meta is separately “enjoined from making false, misleading, or deceptive representations regarding the effect or efficacy of safety features” for Teen Users, though that provision “applies exclusively to representations made by Meta on or after the Effective Date.” *Id.* § II.E.4.a. An independent auditor jointly selected by Meta and the settling States oversees compliance. *Id.* § III.

46. The Attorney General did not sign the settlement agreement. The injunctive relief, while better than nothing, is far from adequate to address the harms Meta causes. The agreement gives only temporary relief, its injunctive terms lasting at most 10 years, several for only 5 years. *Id.* §§ I.G, II.B.2.a–b, III.C, X.B. Yet, aside from 9 carveouts, Meta’s releases from liability are permanent. *Id.* § IV. The agreement also does not adequately address Meta’s past deceptive statements and omissions. And the defaults and caps contemplated in the agreement are too minimal and of little utility when they can be easily lessened—or removed entirely. The settlement does not go far enough to protect Florida’s children. The monetary relief is also so minimal it borders on the absurd. For “a trillion and a half dollar company,” the payment required in the settlement amounts to “a rounding error.” Ex. 2, Source No. 7. That payment is not enough to punish Meta for past harms, much less to deter

¹¹ This refers to an adult who is formally linked through a Platform’s parental supervision controls to a Teen User. Ex. 5, Settlement Agreement § I.FFF, *In re Social Media*, No. 22-MD-03047-YGR.

Meta from engaging in future unfair and unconscionable conduct. The Attorney General will “not capitulate” or “sell out when it comes to [Florida’s] kids.” *Id.*

47. Consequently, none of the settlement’s injunctive relief reaches Florida. Every obligation is “explicitly limited to the Settling States,” Ex. 5, Settlement Agreement § X.C, Ex. B at 99, *In re Social Media*, No. 22-MD-03047-YGR, and the operative provisions are scoped by their own terms to users in the settling States, *see, e.g., id.* §§ II.A.1, II.A.6.a, II.B.1. “Non-Participating States” do not “have any rights arising out of or in connection with this Agreement, including but not limited to any rights to enforce the terms.” *Id.* § X.K.

48. This settlement presents a material shift that requires prompt action in Florida for three reasons. First, Florida’s children will soon have materially less protection than children in fifty-two other states and territories using an identical product. Second, the settlement demonstrates the scope of what changes Meta finds approachable, laudable, and necessary. Meta’s public urging of competitors to join in the “protections” from the “new industry standard” indicates Meta knows full well that this settlement protects children from harms they would otherwise suffer but for the injunctive relief in the settlement. Ex. 2, Source No. 4. Third, without judicial intervention, this settlement may become cemented as the ceiling for the changes Meta is willing to make, but the terms of the settlement should, instead, be the floor. Meta should not operate under the misimpression that these changes alone can cure the devastating harm it has caused. The Attorney General therefore moves for a temporary injunction that will protect Florida’s children through changes Meta has

already shown are feasible.

LEGAL STANDARD

In FDUTPA actions, the Attorney General may obtain a temporary injunction that is automatically “effective throughout the state” against any person who “has violated” or “is violating” the Act. § 501.207(1)(b), (3), Fla. Stat. (2026).

Although Florida (and federal) law typically requires a four-factor showing before permitting injunctive relief, that test does not apply when the government seeks to enforce its police power using a statute authorizing injunctive relief. “The AG does not have to establish irreparable harm, lack of an adequate legal remedy, or public interest as ordinarily required for a temporary injunction,” but instead need only “demonstrate a substantial likelihood of success on the merits.” *E-Racer Tech, LLC v. Off. of Att’y Gen.*, 198 So. 3d 1107, 1110 (Fla. 4th DCA 2016); *see Millennium Commc’ns & Fulfillment, Inc. v. Off. of the Att’y Gen.*, 761 So. 2d 1256, 1260 (Fla. 3d DCA 2000) (“[B]ecause section 501.207(1)(b) expressly authorizes the Department to seek injunctive relief on behalf of the state, . . . [t]he Department’s sole burden at a temporary injunction hearing under FDUTPA is to establish that it has a clear legal right to a temporary injunction.”).

To show a substantial likelihood of success on the merits, the Attorney General may rely on “statements having circumstantial guarantees of trustworthiness” to “supplement and explain other evidence.” § 501.207(7), Fla. Stat. (2026). Even if the declarant is available as a witness, these statements “shall not be excluded as hearsay evidence”, as long as the statement is “evidence of a material fact,” the statement is “more probative” than other evidence that can be procured through

reasonable effort, and admitting the statement into evidence serves the interest of justice.¹² *Id.*

Courts issuing “temporary or permanent” injunctions under FDUTPA may order a broad range of relief, including requiring the defendant “to carry out a transaction in accordance with the reasonable expectations of consumers or governmental entities,” imposing “reasonable restrictions upon the future activities of any defendant to impede her or him from engaging in or establishing the same type of endeavor,” and even “reorganiz[ing] of [the] enterprise.” § 501.207(3), Fla. Stat. (2026).

If a court orders an injunction at the Attorney General’s request in a FDUTPA action, it “shall” not require the Attorney General to pay “bond or surety” at the issuance or during the term of the injunction. § 60.08, Fla. Stat. (2026).

ARGUMENT

The Attorney General need only demonstrate “a substantial likelihood of success on the merits.” *Off. of Att’y Gen. v. Bilotti*, 267 So. 3d 1, 3 (Fla. 4th DCA 2019). It does so on two independent grounds: Meta engaged in deceptive acts, and Meta engaged in unfair and unconscionable acts. § 501.204(1), Fla. Stat. (2026). Either ground establishes a clear legal right to a temporary injunction. Because Meta has already been enjoined in one state (New Mexico) and has agreed to comparable measures for fifty-one other states and territories, the Attorney General seeks a

¹² The Attorney General will present the necessary underlying evidence at the evidentiary hearing for this temporary injunction.

feasible temporary injunction of similar scope to the relief in other litigation that will give necessary protection to Florida's children.

I. There Is a Substantial Likelihood the Attorney General Will Succeed on the Merits of Its Claims.

Meta's FDUTPA violations fall into two categories: deceptive acts and unfair (ultimately unconscionable) acts. On the deception side, Meta made affirmative misstatements falling into at least eight categories. It also deceived by omission in at least two ways: withholding data on how its Platforms harm Young Users and reporting only favorable facts about its time-management tools. Meta acted unfairly in its design of eight addictive core features and in developing deliberately ineffective time-management tools. Meta acted unconscionably by sacrificing its most vulnerable users' health and welfare on the altar of company profit and growth. Thus, the Attorney General is likely to succeed on the merits of its claims and an injunction should issue against Meta.

A. Meta engaged in deceptive acts.

The Attorney General is substantially likely to prove that Meta deceived by affirmative misstatement and by omission. FDUTPA prohibits "deceptive acts or practices in the conduct of any trade or commerce." § 501.204(1), Fla. Stat. (2026). Courts are to construe this prohibition "liberally" to promote FDUTPA's goal of "protect[ing] the consuming public . . . from those who engage in . . . deceptive . . . acts." § 501.202(2), Fla. Stat. (2026). To demonstrate a deceptive act, the Attorney General has the burden of proving that Meta's acts and omissions were "likely to mislead consumers acting reasonably in the circumstances, to the consumers'

detriment.” *PNR, Inc. v. Beacon Prop. Mgmt., Inc.*, 842 So. 2d 773, 777 (Fla. 2003) (citation omitted). The Attorney General “need *not* show actual reliance on the representation or omission at issue.” *Off. of Att’y Gen. v. Commerce Com. Leasing, LLC*, 946 So. 2d 1253, 1258 (Fla. 1st DCA 2007) (emphasis added) (citation omitted). It only needs to show that “a reasonably objective person in the same circumstances would have been deceived.” *Angelo v. Parker*, 275 So. 3d 752, 755 (Fla. 1st DCA 2019); *PNR, Inc.*, 842 So. 2d at 777. Therefore, regardless of whether actual harm has materialized for any particular user, the Attorney General can seek an injunction to stop an unfair and deceptive trade practice that violates FDUTPA. *See Bilotti*, 267 So. 3d at 3.

“[D]eception may be accomplished by innuendo rather than outright false statements.” *Millennium*, 761 So. 2d at 1264 “If the statements are ‘likely to mislead reasonable consumers,’ then it makes no difference if the statements are ‘technically or literally true.’” *Zamber v. Am. Airlines, Inc.*, 282 F. Supp. 3d 1289, 1299 (S.D. Fla. 2017) (citation omitted).¹³ A plaintiff “need not introduce consumer survey data” to show a statement’s “tendency to deceive.” *FTC v. NPB Advert., Inc.*, 218 F. Supp. 3d 1352, 1364 n.3 (M.D. Fla. 2016). Indeed, a defendant’s “knowledge of a deceptive act is not required to state a claim under FDUTPA.” *Simmons v. Ford Motor Co.*, 592 F.

¹³ In construing FDUTPA’s declaration that “unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful,” § 501.204(1), Fla. Stat. (2026), courts “shall” give “due consideration and great weight . . . to the interpretations of the Federal Trade Commission and the federal courts relating to [section] 5(a)(1) of the Federal Trade Commission Act.” *Id.* § 501.204(2); *see* § 501.202(3), Fla. Stat. (2026).

Supp. 3d 1262, 1294 (S.D. Fla. 2022) (citation omitted). “[T]he Act focuses on whether an act is deceptive, not whether a defendant knew that the allegedly violative conduct was occurring.” *Gavron v. Weather Shield Mfg., Inc.*, 819 F. Supp. 2d 1297, 1302 (S.D. Fla. 2011).

Thus, rather than parsing technicalities and the validity of individual statements, courts look to the “**net impression** created” by the statement and its surrounding circumstances. *Coleman v. CubeSmart*, 328 F. Supp. 3d 1349, 1361 (S.D. Fla. 2018) (emphasis in original); see *In re Social Media*, 838 F. Supp. 3d at 1000 (“Ultimately, the Court concluded that ‘these isolated representations are part of a cohesive whole which, as alleged, form a deceptive scheme by Meta to obfuscate the risks of serious harm stemming from platform use.’” (citation omitted)).

Meta engaged in deceptive acts and practices “in the conduct of any trade or commerce.” § 501.204(1), Fla. Stat. (2026). Meta built a strategy of narratives designed to reassure the public, protect its brand, and minimize health and well-being concerns. This involved the explicit marketing objective of getting “teens, parents, educators, and policy makers to believe” its Platforms were “safe and kind.” Ex. 48 at 3; see Ex. 49 at 3–4 (describing a “Disrupting the Narrative” framework to counter bad public relations). In furtherance of that strategy, Meta both affirmatively misrepresented the nature and effects of its Platforms and omitted crucial information from its public statements.

1. Meta engaged in deception by affirmative misrepresentation.

Meta’s affirmative misrepresentations fall into at least eight categories: (a) harmfulness, (b) addictiveness, (c) restrictiveness of content, (d) exclusion of

underage users, (e) prioritization of user well-being, (f) monetary valuation of Young Users, (g) access to internal research, and (h) use of internal research. Consumers could reasonably rely on Meta's statements in each category as assuring that the Platforms were safe—misleading Young Users into using them to their detriment, and misleading parents into allowing it.

a. Meta deceptively indicated its Platforms are not harmful for Young Users.

Meta repeatedly signaled that its Platforms were safe for Young Users. In a statement to Congress, Mark Zuckerberg said he did not “believe” that Meta harms children. Ex. 50 at 111. Instead, he assured that “overall, the research that we have seen is that using social apps to connect with other people can have positive mental health benefits and well-being benefits by helping people feel more connected and less lonely.” *Id.* at 67. When Congress later confronted Meta's Global Head of Safety, Antigone Davis, about Zuckerberg's statement being only “one side of the coin,” Davis doubled down and said, “the research showed that many more people, actually more teens, found the Instagram use helpful when they were struggling.” Ex. 51 at 35. She reassured that Meta “work[s] tirelessly to put in place the right policies, products, and precautions so [Meta's youngest users] have a safe and positive experience.” *Id.* at 12. Adam Mosseri, Head of Instagram, echoed the sentiment, saying Instagram's effect on teen mental health seems “quite small.” Ex. 2, Source No. 8. Pratiti Roychoudhury, Meta's Vice President and Head of Research, insisted that “[s]uggesting that Instagram is toxic for teens is simply not backed up by the facts.” Ex. 2, Source No. 9. Also echoing Davis's script, she pushed back on reports of

Instagram’s toxicity: “Instagram’s research shows that on 11 of 12 well-being issues, teenage girls who said they struggled with those difficult issues also said that Instagram made them better rather than worse.” *Id.* Meta would not drop the façade even with shareholders—on a quarterly earnings call, Chief Operating Officer Sheryl Sandberg assured that “[w]e also have to keep people safe and give them control over their experience on our apps, and we are.” Ex. 2, Source No. 10.

That was the story being peddled to the public. Inside Meta, however, a very different story was playing out. In the BEEF survey—conducted in the same timeframe as the prior reassuring statements—Meta discovered that Young Users aged 13 to 15 had the “highest rates” of exposure to key safety and well-being issues. Ex. 52 at 21. The children interviewed reported that, within the past week, 8.4% of them had “seen someone harm themselves[] or threaten to do so,” 10.8% had experienced or been exposed to bullying, 13% had received unwanted sexual advances, 12.8% had been exposed to violent or disturbing images that bothered them, and 19.2% had been exposed to unwanted sexual images. *Id.* at 6, 21. Young Users aged 16 to 17 fared little better—7.2% of them reported exposure to self-harm content, 9.7% had experienced or been exposed to bullying, 14.1% had received unwanted sexual advances, 14.3% had been exposed to violent or disturbing images that bothered them, and 18.4% had been exposed to nudity. *Id.* at 22.

In a separate internal study, 1 in 3 teen girls interviewed who struggled with body-image issues reported that Instagram made their issues worse. Ex. 2, Source No. 11. This study catalogued other potent harms, with 17% of teen girls and 7.4%

of teen boys reporting Instagram made their eating issues worse, 16.8% of teen girls and 13.5% of teen boys reporting it made their sleeping issues worse, and 20% of teen girls and 14.1% of teen boys reporting it made their social-comparison issues worse. Ex. 2, Source No. 11.

In yet another internal report, Meta found the “[h]arm on Instagram falls into three major categories:” (1) “Social comparison,” which can lead to issues with “self-esteem, anxiety, and insecurity”; (2) “Social pressure,” which can lead to “isolation” and “adoption of negative habits”; and (3) “Negative interactions with other people,” which can lead to “isolation, loneliness, depression.” Ex. 2, Source No. 1. It further conceded, “[o]ne in five teens say that Instagram makes them feel worse about themselves,” “[t]eens who struggle with mental health say Instagram makes it worse,” and “[t]eens blame Instagram for increases in the rates of anxiety and depression among teens.” Ex. 2, Source No. 1.

The evidence of harm to Young Users was so pervasive that Meta’s attorneys began *stripping* references to it from documents that went to leadership in order to protect Zuckerberg and Mosseri from “litigation exposure risk,” an action Mosseri claimed was “news” to him when he learned of it. Ex. 53 at 992:23–1004:25, 1100:12–1115:17.¹⁴

To top it all off, after Zuckerberg’s statements to Congress, one of Meta’s

¹⁴ Meta’s established practice is also “to put this label [a/c priv] on any documents or emails that could be considered sensitive, essentially anything that we wouldn’t want the public to see.” Ex. 54 at 854:2–4. The Attorney General anticipates that this “practice” will be a serious sticking point in discovery in this litigation.

researchers emailed Zuckerberg personally to elevate the “critical gap in how we as a company approach harm.” Ex. 55 at 2–4. The email contained a litany of statistics from internal surveys as well as individual accounts about children on the Platforms who experienced everything from bullying, to harmful social comparison, to sexual harassment. *Id.* Zuckerberg never replied. Ex. 56 at 451:23–452:2; *see id.* 448:11–451:22.

Meta promised safety knowing its Platforms were causing harm.

b. Meta deceptively indicated its Platforms are not addictive and not designed to cause extensive or compulsive use.

Meta repeatedly signaled that its Platforms were not addictive or designed to cause Young Users to use them extensively or compulsively. Zuckerberg told Congress, “from a mission perspective, we want to serve everyone. But our goal is not—we don’t—I don’t give our News Feed team or our Instagram team goals around increasing the amount of time that people spend.” Ex. 50 at 68. He emphasized that “it is a common misconception that our teams . . . have goals, of trying to increase the amount of time that people spend.” *Id.* at 67. And he did not “agree” with the idea that Meta profited by “hooking users” and “creating an addiction.” *Id.* at 83. Separately, when asked if it was part of Meta’s “business model to have more eyeballs for a longer amount of time engaged using [its] services,” Davis told Congress, “that is not actually how we build our products.” Ex. 51 at 44. And Mosseri told Congress, “I don’t believe the research suggests that our products are addictive.” Ex. 57 at 18. Maintaining the narrative, Meta told BBC directly that “its products were designed ‘to bring people closer to their friends, family, and the things they care about,’” and

“at no stage does wanting something to be addictive factor into that process.” Ex. 2, Source No. 12.

Meta’s paper trail exposes these statements as outright lies. Years earlier, in a November 9, 2016 email forwarded to Mosseri, a Meta employee stated that “Mark has decided that the top priority for the company in 2017 is teens,” that “teams will take a specific goal for teens,” and twice stated “[o]ur overall goal . . . is total teen time spent.” Ex. 58 at 2–3 (emphasis added). In yet another document setting “[m]ilestones” for 2023, the goal was to increase “minutes per [daily active user]” on Instagram. Ex. 59 at 9.

Weighing the design those mandates produced against public concern about addiction, Meta noted “[t]he stance we have historically taken is to give people control, but not in a way that hurts metrics.” Ex. 60 at 3. Other internal documents acknowledged more explicitly that these goals required and resulted in addictive products:

Product features that are designed to exploit insecurity, or provide a dopamine rush (likes, notification, the pull-down-to-see, the infinite scroll, etc), to increase time spent, are inherently at odds with well-being and take away from people’s ability to consciously focus[] on activities that add value to their lives.

Because our product exploits weaknesses in the human psychology to promote product engagement and time spent . . . if we are committed to the wellbeing of individuals we need to **a) to alert people to the effect that the product has on their brain . . . and b) provide them with tools to have more control over their own experience.**

Ex. 61 at 3 (emphasis in original); see Ex. 62 at 3916:16–3919:23. In a presentation on “adolescent development,” Meta openly recognized that “teen users” would get a “dopamine hit” through experiencing discovery on its Platform, and because “[t]een

brains are much more sensitive to dopamine” this hit made it “much harder” for teens to stop “scrolling and scrolling.” Ex. 63 at 4. The worst offenders for causing these addictive dopamine hits were “DMs, notifications, comments, follows, likes, etc.” *Id.* at 5.

One of the most compelling admissions comes from an internal Meta chat dated October 26, 2023:

[B]asically the company position is that time spent and engagement metrics proxy user value and we are ‘not’ just tuning the algorithm to keep people scrolling as much and as long as possible... *except mechanically, we absolutely do* through a process called the “guided value model” (GVM) process. . . . So really, the algorithm is absolutely tuned to maximize engagement in a[] maximally empirical, principle-less way. I am not sure that the youth legal people realize this, and that it applies to teens just as much as gen pop... *so the things contained in the lawsuits are somewhat hard to refute so long as Teens are part of the GVM process.*

Ex. 64 at 2 (emphasis added).

Unsurprisingly, the research and development plans of this \$1.86 trillion company paid off, and Meta’s design performed as intended: The Platforms are addictive. *See* Ex. 2, Source No. 13. That’s what happens when you pit “a child against the world’s greatest product designers.” *Id.* One of Meta’s own studies showed that 28% of teen boys and 33% of teen girls who had difficulty managing time on social media said Instagram made it worse. Ex. 2, Source No. 11. Another Meta research document showed that in the United States “alone, there are 550K+ teens that spend 28 hours a week on Instagram,” that “Teens make up 15% of DAP [Daily Active People] in the US, but they make up 63% of people who spend more than 28 hours a week on IG.” Ex. 65 at 2–5.

Internally, this result began to take a toll on Meta's employees. Their discomfort was evident in messages and emails. "It seems clear from what's presented here that some of our users are addicted to our products. And I worry that driving sessions [of platform use] incentivizes us to make our product more addictive." Ex. 66 at 3. Or, more bluntly, "APP ADDICTION IS COMMON ON IG." Ex. 67 at 40. In one chat log for a Meta administrative group, employees commented:

- "IG is a drug"
- "We're basically pushers."
- "We are causing Reward Deficit Disorder bc people are binging on IG so much."
- "I know Adam [presumably Mosseri] doesn't want to hear it—he freaked out when I talked about dopamine in my teen fundamentals lead review but its undeniable!"
- "I think all of us (employees) work tirelessly to make our products a positive experience for people but the top down directives drive it all towards making sure people keep coming back for more."

Ex. 68 at 2–3.

The addictive effects were so widely discussed internally that, to avoid "legal risk," Meta employees were required to shift their terminology from "addiction" to "problematic use." Ex. 69 at 2–3. Under this euphemism, Meta employees reported "23.7% of teen WAU [weekly average users]" were "above [the] heuristic" for "problematic use." Ex. 70 at 3; *see* Ex. 71 at 3142:10–22. For the population at large, Meta never pinned down a number. It acknowledged at various points, "problematic use appears to affect 12.5% of people" and "[a]nother 11% of people report negative life impact 'very often,'" Ex. 72 at 3; "Problematic use (prevalence: 55% mild, 3.1%

severe),” Ex. 73 at 2; “[o]ver 30% of users across age cohorts felt that Instagram made problematic use worse,” Ex. 74 at 3; and “31% of US users” meet the problematic use criteria of “having serious problems with sleep, work, or relationships that a user attributes to Facebook,” Ex. 75 at 3.

Meta’s executives insisted their Platforms were not addictive while giving repeated “directives” to “mak[e] sure people keep coming back for more.” Ex. 68 at 2–3.

c. Meta deceptively indicated it protects Young Users from harmful content on its Platforms.

Meta has signaled repeatedly that it protects Young Users from harmful content. Its Community Guidelines have said for years, “[w]e have zero tolerance when it comes to sharing sexual content involving minors,” that “[s]erious threats of harm to public and personal safety aren’t allowed,” that “we’ll remove it or disable accounts if” they encourage self-injury, and that “sharing graphic images . . . to glorify violence is never allowed.” Ex. 2, Source No. 14. Mosseri parroted this, noting that Meta has “never allowed posts that promote or encourage suicide or self-harm,” Ex. 2, Source No. 15, and it doesn’t “allow people to share content that encourages or promotes self-harm or suicide,” Ex. 2, Source No. 16.

Zuckerberg assured Congress that Meta goes “beyond legal requirements and use[s] sophisticated technology to proactively seek out abusive material, and as a result, . . . find[s] and report[s] more inappropriate content than anyone else in the industry.” Ex. 76 at 15. Zuckerberg also represented that Meta has numerous “measures in place to protect minors specifically,” including that “adults can’t contact

minors who they aren't already friends with," and that "content that may be inappropriate" for minors is not shown to them. Ex. 77 at 26. Meta doubled down on the restriction on adult contact, committing publicly that it "restrict[s] people over 19 years old from sending private messages to teens who don't follow them." Ex. 2, Source No. 17.

Davis also testified to Congress that Meta has "introduced new ways to support people on Instagram who may be affected by negative body image or an eating disorder," and that it does "not direct people toward content that promotes eating disorders." Ex. 51 at 34. She, like Zuckerberg, reassured Congress that Meta has "put in place multiple protections to create safe and age-appropriate experiences for people between the ages of 13 and 17." *Id.* at 15. Davis also announced that Meta uses "sophisticated technology and behavioral signals not only to prevent, detect and remove images and videos that exploit children, but also to detect and prevent grooming, or potentially inappropriate interactions between a minor and an adult." Ex. 2, Source No. 18.

For the cherry on top, Guy Rosen, Vice President of Integrity, reported that in Q3 2021, "the prevalence of bullying and harassment content was 0.14–0.15% or between 14 and 15 views of bullying and harassment content per 10,000 views of content on Facebook, and 0.05–0.06% or between 5 and 6 views per 10,000 views of content on Instagram." Ex. 2, Source No. 19.

Again, Meta's records and other research show these statements to be misleading or outright false. As already discussed, Meta's BEEF study shows that

Meta’s Young Users were frequently exposed to harmful content, including content about self-harm and bullying at significantly higher rates than adults. *Supra* at 24–27. Other internal research reinforces this, showing that in the “top 8 Instagram countries” by daily active people, Young Users had “significantly more negative experiences than adults,” with high rates of exposure to suspicious accounts, bullying, hate speech, eating disorders, nudity, violence, and drugs. Ex. 78 at 3, 8. An outside report evaluated Meta’s list of vaunted protections for Young Users and found them severely lacking. Of Instagram’s 47 safety features, 30 tools “were either no longer available or ineffective,” 9 tools reduced harm but only with “notable limitations,” and only 8 tools “worked as advertised.” Ex. 79 at 9–10, 24; *see* Ex. 80 at 1174:6–1177:7. As for the repeatedly emphasized tool that barred adults from contacting minors they were not friends with—Meta’s records indicated teens *were* receiving “DM requests from unconnected adults, *breaking public commitment[s] that we made.*” Ex. 81 at 3–4 (emphasis added).

Meta’s internal research found that child-exploitative content was an even bigger problem on Instagram than on Facebook. Instagram had 38x as many child victims of inappropriate interactions with adults, 21x fewer deletions of CEI (child exploitation imagery), and 90x lower rates of automatically removing IIC (inappropriate interactions with children). Ex. 82 at 4–5, *see* Ex. 92 at 66, 73 (defining terms). Meta attributed these issues “to there being many more minors on IG messaging with adults.” *Id.* at 4. Meta found over 993,000 actors had more than 5 impressions on flagged content in a single 14-day period. *Id.* at 7. In that same 14-

day period, Meta removed over 2,200 suspicious accounts for following over 375,000 teen accounts. *Id.* at 8. And bad actors had developed their own signals for communicating with each other by hashtags on Instagram, including “#gaykid, #sexykid, #12yearoldboyu, #gaykids.” *Id.* at 7.

Meta’s problematic treatment of minors continues to this day. In a viral X post dated September 3, 2026, a disturbed mother reports that she posted a video of herself and her young child to Facebook. Ex. 2, Source No. 20. Meta AI offered her a “suggested question . . . ‘Who’s the child passenger?’” *Id.* When she clicked the question, Meta AI produced a vast amount of private information about each of her children including their names, birth information, and pictures of them, even a photo she deleted years ago. *Id.* Thus, while this litigation focuses on Meta’s past actions, the latest iteration of Meta may be just as eager to collect and disseminate information about children.

Meta promises full protection while knowing its Platforms are rife with predators and harmful conduct.

d. Meta deceptively indicated it effectively excludes users under the age of 13.

Meta has told Congress and the public repeatedly that children under 13 are not allowed on Instagram or Facebook—that it does not market to them, that it screens for them, and that it removes their accounts. Ex. 50 at 82; Ex. 57 at 61; Ex. 51 at 14, 20; Ex. 2, Source Nos. 21, 22.

Behind the scenes Meta’s documents say the opposite:

- “We lack a U13 classifier, insufficient means to detect and remove u13s at scale.”

- “We also have deprioritized u13 enforcement because COPPA compliance is at risk when we sit on knowledge of u13, *incentivizes not knowing*.”¹⁵
- “Clear current u13 backlog (~700k job backlog) which is currently not resourced.”
- “Overall we are quite vulnerable when it comes to age management on our apps. To some degree that is because leadership has decided to live with certain risks at least in the near term. *For example in March, we decided we would not build a classifier to detect minors under 13 years old . . . we will only prioritize this work when we face clear legal obligations to do so.*”

Ex. 83 at 2–3 (emphasis added). It was not until December 14, 2021—after the deceptive statements about underage users—that Meta launched its “underage disables,” permitting it to checkpoint a suspected account of an underage user and disable it and any other linked accounts. Ex. 84 at 2. Even with those changes, former Meta employees warn that it is still not “true and accurate” to say Meta removes underage users. Ex. 85 at 1291:10–1295:1, 1303:22–1304:14. Meta has publicly committed to removing children under 13 while privately turning a blind eye to their accounts.

e. Meta deceptively indicated it prioritizes user well-being and safety over user engagement and company growth.

Meta has committed itself to the public narrative that it prioritizes safety and well-being over user engagement and company growth. Zuckerberg said it is “just not true” that Meta prioritizes profit over safety. Ex. 2, Source No. 23. Meta’s “Best Interests of the Child Framework” promises the same. Ex. 2, Source No. 24. And

¹⁵ Meta had another incentive for not knowing—it viewed “[u]nder 13s, including regulated under-13s” as a “big ‘build’ opportunit[y].” Ex. 58 at 2.

Meta furthered the idea when announcing the new “Take a Break” feature, saying Meta “want[s] teens to feel good about the time they spend on our apps.” Ex. 2, Source No. 25; *see* Ex. 2, Source No. 26.

These statements are misleading. As discussed, Meta made “total teen time spent” a company-wide goal. Ex. 58 at 2. Meta knew that its product exploited weaknesses in human psychology. *Supra* at 27–31. And its vaunted efforts, like creation of a safety team, were meaningless because Meta gave that team little to no power to enact any of the measures the team determined necessary to protect Young Users. Ex. 80 at 1001:16–1003:9. As will be discussed in greater detail below, in Project Daisy, Meta also abandoned its plan to hide like counts—knowing that would have measurable benefits on mental health—because hiding like counts resulted in a small reduction in user interaction with the Platforms. *Infra* at 38–40. Thus, Meta’s prioritization of user well-being was more farce than fact.

f. Meta deceptively indicated it does not place a monetary value on Young Users.

Meta has cultivated an image of refusing to put a dollar value on Young Users. When asked by Congress what the estimated “lifetime value of a user is for kids who start using Facebook products before age 13,” Davis pushed back on the whole concept, saying “Respectfully . . . that is not how we think about building products for our—for young people.” Ex. 51 at 23.

Internally, Meta had this to say: “Because of the high value of young teens, more product teams, and not just the Youth Team, should care about young teens as those are the users with the potential for highest loyalty and value over time.” Ex.

86 at 16. It even took that step Davis deemed unthinkable, quantifying the “lifetime value” of a 13-year-old Facebook user at “\$270” in one report, *id.* at 2, and as high as “\$350” in another, Ex. 87 at 2. Meta’s takeaway from these numbers—“We should acquire teens as young as possible.” *Id.*

g. Meta deceptively indicated it does not restrict access to internal research findings.

Meta puts on a performance of transparency. When Congress asked if Meta would make data available to independent researchers, Mosseri assured “I can commit to you today that we will provide meaningful access to data so that third party researchers can design their own studies and make their own conclusions about the effects of well-being on young people and on ranking.” Ex. 57 at 17.

Yet that data is worth little because Meta curates it to avoid legal exposure. For example, the BEEF survey data included results from a question asking “how bad” bullying made users feel. Ex. 62 at 3774:17–3775:11. The team member who included this question was “told [he] need[ed] to delete” the entire dataset of information answering that question and “[not] analyze it” for “policy/legal reasons.” *Id.* at 3775:7–3777:19. In fact, he was barred from asking “about emotions in surveys anymore.” *Id.* at 3775:7–23. Meta even blocked a primary BEEF consultant from sharing his research data with his own colleagues in a “good-bye” post. Ex. 88 at 1733:5–1734:8.

Nor was that the only destruction of crucial data. In 2021, Meta started telling its researchers “We’re going to erase certain findings. We’re going to prevent research from even collecting certain types of data. If you’ve written something and put it in

a report, ah, you got to remove it. And even [if you have not written the findings down]—you can’t talk about these findings.” Ex. 89 at 4241:11–4242:8. In one instance, a Meta researcher arranged a home interview with a mother to discuss how one of her sons had been propositioned for sexual acts and nude photos on Meta’s Platforms. Ex. 90 at 4397:12–4399:10. Mid-interview, the researcher received a message on his computer forcing him to stop. Ex. 90 at 4399:11–21. “[A]fterwards, management and legal followed up . . . to make sure that that information, that data, had been erased.” *Id.* at 4399:22–24.

h. Meta indicated it uses internal research findings to improve product safety on a regular basis.

Meta worked to project an image of asking itself “hard questions” and then using that research to “improve the experience for teens.” Ex. 2, Source No. 27. Discussing Project Daisy, a test exploring the removal of “like counts,” Meta said it “tested” the step “to see if it might depressurize people’s experience” but the results were “beneficial for some and annoying to others.” Ex. 91 at 2. As a result, Meta added like removal as an “opt-in” feature buried in Instagram’s settings.¹⁶ Ex. 91 at 2–3.

The actual effect of Project Daisy? Meta knew it was “one of the clearest things (supported by research) that we can do to positively impact social comparison and well-being on IG.” Ex. 93 at 7; *see also id.* (“Daisy is such a rare case where a product intervention can improve well-being for almost everyone that uses our products.”).

¹⁶ Between January 2023 and March 2025, only 3.48% of Young Users turned on this setting. Ex. 92 at 63 (quoting *In re Social Media*, No. 22-MD-03047-YGR (N.D. Cal.), Dkt. No. 2887-46).

Meta *knew* Daisy had “statistically significant support.” Ex. 94 at 2. The Daisy research team reported that, “after living with Daisy” (without like counts) for two weeks, test subjects were “significantly more favorable toward the concept of hiding likes.” *Id.* at 4. Hiding like counts decreased negative social comparisons in teen girls by a reliable 6% when the like-suppression was mandatory. Ex. 95 at 3–4. And, research indicated “that the most harmful comparison is between your posts and post with large like counts,” so the positive effect of hiding like counts “is erased” if people can still opt into like counts or see that certain posts had large like counts. Ex. 94 at 5.

Internally, members of Meta’s safety team lamented leadership’s decision to go with the opt-in approach and complained that “[t]he bar for well being (and social comparison) wins has been set too high to be achievable.” *Id.* at 3 (emphasis omitted). One pointed out that, “if we can’t ship Daisy given the external comms around it and the supporting research, then I am doubtful that we can ship any broad product changes with the purpose of improving user well-being.” Ex. 93 at 7. Meta knew in advance that an opt-in version of Daisy would have negligible impact. Meta explored the opt-in and opt-out framework before releasing the change and found that when the like “controls are opt-in, only 0.72% of people choose to hide like counts, but when they’re opt-out, 35% leave their like counts hidden.” Ex. 96 at 3.

None of this mattered to leadership when held against the *real* reason Meta chose to drop Daisy: “it was not impactful from the lens that IG was evaluating previously (reduce creation flow abandonment and reducing deletion of posts with

low like counts) and was pretty negative to FB metrics.” Ex. 95 at 3 (emphasis omitted). Meta’s definition of “pretty negative” might not match the general public’s. The effect was minuscule—a percentage point or less of loss on revenue, ad impressions, Explore time, ad clicks, and Reels impressions. Ex. 97 at 7–8; Ex. 98 at 5.

Even if Meta asks itself the “hard questions,” Ex. 2, Source No. 27, that exercise is futile when it ignores the hard answers.

2. Meta engaged in deception by omission.

Affirmative deception was not Meta’s only method to mislead the public about the safety of its Platforms. It also deceived by omission to protect its public image and keep Young Users on its products. First, it published deceptively favorable statistics about the harm its Platforms caused while withholding much less favorable information. Second, it held up selective facts about the effectiveness of its time-management tools while, again, withholding much less favorable data about their wide lack of use.

a. Meta published CSER while withholding the BEEF and TRIPS data measuring the same harms.

With CSER, Meta deliberately reported only part of the story on the function of its Platforms, touting misleading statistics that hid real harm. The Community Standards Enforcement Report is a quarterly report that Meta issues to “provide [] metrics on how we enforced our policies.” Ex. 2, Source No. 19. In November 2021, Meta made those metrics sound downright comforting. *Id.* Meta celebrated that violence made up only “0.04–0.05%, or between 4 and 5 views per 10,000 views of

content.” *Id.* Meta “[f]or the first time” shared “metrics for bullying and harassment on both Facebook and Instagram.” *Id.* And Meta bragged that “prevalence of bullying and harassment content was 0.14–0.15% or between 14 and 15 views of bullying and harassment content per 10,000 views of content on Facebook, and 0.05–0.06% or between 5 and 6 views per 10,000 views of content on Instagram.” *Id.*

But CSER measured harm as a share of content views, not as a share of users affected. Meta’s CSER report did not mention that Meta separately measured the share of users affected in the BEEF study and that the two measures diverged by orders of magnitude. BEEF surveyed roughly 240,000 Instagram users—one of the largest studies Meta ever ran on the harms its Platforms caused Young Users. Ex. 80 at 1057:9–1061:25. As already discussed, in the BEEF data from 2021, of the interviewed users aged 13 to 15, 10.8% had—in the past week alone—experienced or been exposed to bullying and 12.8% had been exposed to violent or disturbing images that bothered them. Ex. 52 at 6, 21. For the users aged 16 to 17, 9.7% had experienced or been exposed to bullying, and 14.3% had been exposed to violent or disturbing images that bothered them. *Id.* at 22. Yet Meta did not make the BEEF results public. Ex. 80 at 1076:5–14. Outside of news articles, parents and Young Users had no access to the studies’ findings until the results surfaced as exhibits in litigation. *Id.*

While BEEF explored a cross section of issues from all of Meta’s “user input channels,” a separate study, TRIPS, focused on users’ “policy-violating experiences.” Ex. 52 at 4. Its questions overlapped with BEEF, also focusing on content involving

violence, bullying, and nudity. *Id.* at 6. And the numbers were “pretty consistent” with BEEF, showing “around 20 percent, or one in five people were experiencing [bullying] on Instagram.” Ex. 99 at 355:4–19; *see id.* at 356:9–16. Indeed, in an email that one of Meta’s researchers sent directly to Zuckerberg after his congressional testimony about how safe Meta was, the researcher shared even more concerning statistics from TRIPS—within the last 7 days before being interviewed, “21.8% of 13–15 year olds said they were the target of bullying. 39.4% of 13–15 year olds said they experienced negative comparison. 24.4% of 13–15 year old[s] said they received unwanted advances.” Ex. 55 at 3. Of course, TRIPS is another survey Meta did “not” disclose “to the public alongside the” CSER statistics. Ex. 99 at 353:11–21; *see id.* 353:11–354:8; 355:4–19.

b. Meta held up selective facts about teen time-management tools, omitting unfavorable ones.

Meta told only part of the story about how Young Users used its time-management tools. In a public submission to Congress, Zuckerberg bragged that Meta “le[d] the industry” with its tools designed for teen safety. Ex. 76 at 15. He highlighted that “over 90% of U.S. teens are still using daily limits 30 days after initial adoption,” that there are “Take a Break notifications, which show full-screen reminders to leave the Instagram app,” and that “if they’re on the app for a specific amount of time at night,” teens are prompted to “turn on Quiet Mode, which turns off notifications and auto-replies to messages.” *Id.* at 105–06. In a blog post, Mosseri highlighted similar statistics and promised to “make sure that teens are aware” of the new features. Ex. 53 at 1132:21–1135:13.

What Zuckerberg did not mention is what else that same study reported. Namely, only 11.7% of Young Users had adopted Quiet Mode. Ex. 100 at 2. Only 4.4% of Young Users had adopted the Take a Break tool. *Id.* And a minuscule 1.4% of Young Users had adopted the “daily limit” tool. *Id.* Even worse, despite the “adoption of some products,” Meta had actually seen an “*increase* in the number and percentage of teens with late night time” spent on its Platforms. *Id.* at 3 (emphasis added).

When confronted with this omission, Mosseri admitted that Meta knew these statistics but did not disclose them because Meta was supposedly “trying to drum” the numbers up. Ex. 53 at 1125:11–1126:4.

A former Meta employee has been more forthcoming. Ex. 54 at 854:5–855:2. The adoption rate was a “drop in the ocean.” *Id.* Adoption of these tools was so low that Meta “tried different time windows and slightly different definitions to honestly kind of cherry-pick a good result.” *Id.* at 866:2–867:4. But, ultimately, the launch of tools like Quiet Mode was “not a success.” *Id.* at 868:2–8. Also, far from making Young Users aware of these tools, Meta “kept a high bar on which users were targeted” designing reminders to take a break to “minimize ecosystem impact.” Ex. 53 at 1133:8–1136:16.

Even when Meta shares partial information that may in some sense be technically “accurate,” it is still misleading because what Meta excludes is far more significant.

* * * *

Meta did everything in its power to portray itself as safe and trustworthy—even though information inside the company decisively showed it was anything but—and reasonable members of the public would have been deceived by Meta’s acts. *PNR, Inc.*, 842 So. 2d at 777; *Angelo*, 275 So. 3d at 755. At least two other jurisdictions to consider these misstatements and omissions have found them deceptive. *See In re Social Media*, 838 F. Supp. 3d at 993–1000; Ex. 3, Judgment at 2–3, 20–21, *New Mexico*, No. D-101-CV-2023-02838. Given this history, Meta cannot be trusted with Florida’s children absent direct judicial oversight.

B. Meta engaged in unfair and unconscionable acts.

The Attorney General is substantially likely to prove that Meta acted unfairly by designing eight features that harm Young Users (cosmetic filters, likes and comments, Infinite Scroll, Autoplay, Reels, Stories and Live, multiple accounts, notifications), and by promoting time-management tools that were blatantly ineffective. Meta also acted unconscionably by designing and using these features and tools to exploit its most vulnerable users for growth and revenue.

FDUTPA prohibits “unconscionable . . . and unfair . . . acts or practices in the conduct of any trade or commerce.” § 501.204(1), Fla. Stat. (2026). As with the prohibition on deceptive acts, courts are to construe this prohibition “liberally” to promote FDUTPA’s goal of “protect[ing] the consuming public . . . from those who engage in . . . unconscionable . . . or unfair acts.” § 501.202(2), Fla. Stat. (2026). FDUTPA does not define “unfair.” Some courts determine an act or practice is unfair if it “offends established public policy” and “is immoral, unethical, oppressive, unscrupulous or substantially injurious to consumers.” *PNR, Inc.*, 842 So. 2d at 777

(cleaned up, citation omitted).

However, to align with the FTC’s approach to this term, *Porsche Cars N. Am., Inc. v. Diamond*, 140 So. 3d 1090, 1096–98 (Fla. 3d DCA 2014) (citing 15 U.S.C. § 45(n)), other courts deem an act or practice unfair if it causes or is likely to cause “substantial injury to a consumer which the consumer could not have reasonably avoided and which is not outweighed by countervailing benefits to the consumer or to competition,” *Angelo*, 275 So. 3d at 755 (citation omitted). Substantial injury is not limited to “tangible harm” and can include “unwarranted health and safety risks.” *FTC v. Roca Labs, Inc.*, 345 F. Supp. 3d 1375, 1395 (M.D. Fla. 2018) (citing S. Rep. No. 103–130, at 13, 1993 WL 322671 (1993)). “Consumers can reasonably avoid injury if they ‘had a free and informed choice that would have enabled them to avoid the unfair practice.’” *FTC v. Pointbreak Media, LLC*, 376 F. Supp. 3d 1257, 1285 (S.D. Fla. 2019) (citation omitted).

FDUTPA also does not define “unconscionable,” and it appears that Florida’s appellate courts have not defined it in this context either. § 501.204(1), Fla. Stat. (2026). Precedent in other contexts looks to the “common-law doctrine of unconscionability,” which encompasses acts that are “unjust, or shocking to the conscience, such as when one person exploits a more favorable bargaining position to take advantage of another.” *Gordon v. Rosenblum*, 393 P.3d 1122, 1128 (Or. 2017); see *Basulto v. Hialeah Auto.*, 141 So. 3d 1145, 1157 (Fla. 2014) (noting “[u]nconscionability” can involve “*an absence of meaningful choice*” (emphasis in original)). Put another way, an unconscionable act “affront[s] the sense of justice,

decency, or reasonableness.” *Baptist Health v. Murphy*, 226 S.W.3d 800, 811 n.6 (Ark. 2006) (citation omitted).

Through the design features and faulty time-management tools described below, Meta’s Platforms caused or were likely to cause substantial physical, mental, and emotional injury that Young Users could not reasonably avoid. *Angelo*, 275 So. 3d at 755; *Porsche Cars*, 140 So. 3d at 1097–98. These injuries are not outweighed by countervailing benefits to the Young Users. *Angelo*, 275 So. 3d at 755. And Meta’s use of these features and tools to exploit the vulnerable psychology of its Young Users in the name of growth and profit affronts justice, decency, and reasonableness. *Gordon*, 393 P.3d at 1128.

1. Meta’s appearance-altering filters are unfair to Young Users.

Meta built a development platform, Spark AR, that let outside developers deploy augmented-reality filters on Instagram. Ex. 101 at 5765:20–5766:7. Some of these filters could make a user look like a cat, Pikachu, or some other fantasy character. *Id.* at 5754:2–5755:17, 5765:20–5766:22. Others altered facial structure in ways ordinarily achieved only through cosmetic surgery—enlarging Young Users’ eyes, slimming their noses, plumping their lips. *Id.* at 5717:9–5719:19. Meta soon learned the “Spark filters” were “overwhelmingly used by teen girls,” and “actively encourag[ed] young girls into body dysmorphia.” Ex. 102 at 12.

Meta initially banned filters with cosmetic surgery effects in response to “expert and press concerns about potential negative well-being impacts, especially on minors.” Ex. 101 at 5721:20–5722:3, 5726:8–16. During the ban, in consultation with

“outside experts,” a Meta team assessed which filters “could potentially be harmful.” *Id.* at 5718:10–5719:4. The team spoke with “18 experts including psychologists, researchers, body image activists, and AR professionals.” Ex. 103 at 3. The team found reasons to make the ban permanent, including that the cosmetic-surgery effects “are cause for concern for mental health and well-being, especially amongst vulnerable populations (females, youth, and those with a history of mental health concerns, et cetera).” Ex. 101 at 5726:17–5727:22. The team shared these concerns with Zuckerberg directly, *id.* at 5727:23–5728:1, 5729:5–12, but was candid about the cost of keeping the ban—“it is likely that we will see a negative growth impact, simply because any restriction is likely to reduce engagement if people go elsewhere,” Ex. 104 at 3.

Surprise, surprise. Meta lifted the ban. Ex. 101 at 5729:9–21. In ordering this, Zuckerberg gave one caveat: he was “certainly willing to take a longer path to roll this out *if it will help us land it better*.” Ex. 105 at 4 (emphasis added).¹⁷

2. Meta’s quantification and public display of likes and comments are unfair to Young Users.

“[I]magine what it’s like to be a kid in school and you have a badge on you that says, ‘How many people like you?’ That changes in real-time depending on what you do . . . ?” Ex. 80 at 980:20–25. That is what Meta has done to Florida’s children with its quantification of likes and display of comments. As discussed above, Meta has knowingly caused extensive injury with this feature, and despite this, when Meta had

¹⁷ Meta eventually removed the “whole filter platform” in 2025. Ex. 106 at 6432:3–6.

the option to spare Young Users from this burden, Meta chose profit over people and kept counting likes. *Supra* at 38–40.

3. Meta’s deployment of Infinite Scroll is unfair to Young Users.

In 2006, when webpages required users to click a “next” button to reload, one designer built a version of Infinite Scroll so people could find what they wanted faster and leave. Ex. 88 at 1818:25–1820:22, 1857:14–1858:14. The intent of Infinite Scroll “was never to keep people” on the webpage. *Id.* at 1862:5–13. Instead of patenting his version of Infinite Scroll, the designer made it an “open source[]” and “gave it away for free.” *Id.* at 1859:18–21. Then Meta came along, and the designer saw the tool he had built being used in ways he never “intended it to be.” *Id.* at 1861:20–1862:13.

At Meta, Infinite Scroll was turned into a “never-ending supply” of content, allowing users to “scroll as much as [they] physically can” and still have “trillions of things . . . to look at.” Ex. 80 at 978:9–15. Without any natural stopping point, Infinite Scroll became “a pillar of addictive design.” Ex. 88 at 1759:23–1760:22. That effect was deliberate—at Meta, Infinite Scroll was “designed” to keep users “on there and come back as much as possible.” Ex. 80 at 979:7–981:22. It was “not . . . designed with a teenager’s well-being in mind.” *Id.* at 981:23–982:6. And, as discussed above, Meta knew full well the catastrophic effect that features like Infinite Scroll had on Young Users. *Supra* at 27–31.

Technologically, “there’s nothing stopping” Meta from putting breaking points, like mandatory pauses, in the Infinite Scroll on Young Users’ feeds; it would be an

“easy” change. Ex. 80 at 997:4–10. And it would also be a significantly more effective change than the faulty time-management tools that merely “create the illusion of choice.” Ex. 88 at 1913:3–1915:3, 1922:8–10. Yet, when someone at Meta proposed alternatives to Infinite Scroll, she was “laughed at” and told “it would lower engagement.” Ex. 71 at 3143:14–3144:9.

4. Meta’s use of Autoplay is unfair to Young Users.

Autoplay began “as a feature surrounding . . . advertising” that allowed ads to “start playing automatically.” Ex. 88 at 1760:23–1761:4. In fact, when Meta first announced the feature, “people really hated” it. Ex. 80 at 979:16–20. But then the “statistics showed that people looked at videos more when you started playing [them] automatically.” *Id.* So, Meta added Autoplay directly to Instagram’s “Explore” function to “increase time spent” by “teens” on Meta’s Platforms. Ex. 62 at 3760:15–3762:22.

In its current iteration, Autoplay is “hyperoptimized” for “nonstop” content. Ex. 88 at 1761:1–9. It is one of the features that make it hardest for Young Users to manage the time they spend on Instagram. Ex. 107 at 10. This is because it “exploit[s] parts of human psychology, like . . . the . . . sensitivity to reward.” Ex. 62 at 3914:16–3915:9. According to Meta’s own reports, medical clinicians categorize it as “mostly detrimental” for patients’ mental health. Ex. 108 at 13.

5. Meta’s use of Reels is unfair to Young Users.

From 2018 into the early COVID-19 pandemic, Meta felt the rise of TikTok—“a very powerful, formidable competitor” pulling Young Users away. Ex. 109 at 6624:14–6627:1. So Meta developed Reels to keep “teens” from “mov[ing] fully to

TikTok.” *Id.* Soon Meta had a new goal: use Reels to make Instagram “the leading platform for short-form creative performance.” *Id.* at 6633:3–10. To do that, Meta focused on “teens,” tantalizing them into creating Reels with the “positive validation” of “a shot at breaking or going viral.” *Id.* at 6633:11–6634:18. Instagram modified its algorithm so Reels feeds would include “unconnected content” from people the user did not follow. *Id.* at 6634:19–6635:1. It also designed the interface as a “vertical feed customized to” the user, Ex. 110 at 6920:16–6922:5, that, with the integration of Infinite Scroll and Autoplay, allows a user to swipe through videos that begin playing automatically as the user swipes, Ex. 80 at 997:17–999:14.

The result, in Meta’s own words, was “plus 2.6 daily active users, plus 5.7 sessions, plus 22.7 percent post impressions, and plus 24.6 percent time spent. *These wins [were] larger with teens.*” Ex. 110 at 6959:18–6961:23 (emphasis added).

While Meta racked up wins, its Young Users bore the consequences of a feature they had no chance of understanding because of what Meta left out of its announcements. While some at Meta are “confident” Reels was “a safe product when [Meta] launched [it],” Ex. 106 at 6368:18–6369:5, Instagram’s then Head of Safety Policy admits that Meta “did not have an effective way of enforcing its Community Standards on Reels” at launch—a point Meta hid from the public. Ex. 88 at 1937:21–1938:18. In fact, Meta knew the following:

Minors who go viral on Instagram will likely experience increased interactions with unknown people. As their content, and by extension, their account becomes surfaced to more unconnected people, they would benefit from additional protections that they can turn on, like limiting who can send them private DMs or follow requests. However, *with lack of age data, we cannot effectively develop solutions at scales that address virality of minors on Instagram* without also generating a large number of false positives/false negatives.

Id. at 1939:21–1940:7 (emphasis added).

Meta’s Reels algorithm also promoted sexualized content—particularly the sexualization of children—and targeted the content heavily at new Young Users. Ex. 110 at 6924:9–6930:23, 6953:12–6955:15. This pattern in the Reels algorithm was “effectively rewarding the minors for posting” sexualized content and exposing them to adults who would make “predatory” and “extremely inappropriate” comments. Ex. 80 at 1210:18–1211:12.

6. Meta’s use of ephemeral and time-sensitive content (Stories and Live) is unfair to Young Users.

The Stories feature allows users to post “[t]ime bound . . . Catch it before it’s gone” content to Meta’s Platforms, creating an artificial sense of urgency in Young Users. Ex. 111 at 3. Meta adopted the disappearing-content format after seeing its popularity on competitors’ platforms. Ex. 106 at 6319:19–6321:1. Stories disappear after 24 hours. *Id.* at 6320:8–13. It is one of the features that make it hardest for Young Users to manage the time they spend on Instagram. Ex. 107 at 10.

The Live feature is time-sensitive in a profoundly different way. “[L]ive is when you basically post something live, when your video [is] in real time.” Ex. 112 at 5440:16–21. It was originally pitched as a way for users to “be [their] own broadcaster” from “anywhere, anytime.” Ex. 113 at 2082:13–2083:4. The real-time

nature of Live is “challenging” because an intervention, such as removing the feed, can “trigger somebody, in a moment like that, to actually then go forward with what they’re talking about on the platform.” Ex. 112 at 5441:2–10. Yet, a delayed intervention could also cause the harm to occur. *Id.* Live is another feature Meta “shipped quickly and put out into the market,” only to “quickly” learn that it came with serious issues—“there were suicides being broadcast, and other harm being broadcast on the product.” Ex. 113 at 2083:5–11.

7. Meta’s permitting and promoting ownership of multiple accounts by a single user (finstas) is unfair to Young Users.

“Finsta” means “fake Insta,” Ex. 85 at 1318:19–23, or “friend Insta,” and refers to “secondary account[s].” Ex. 109 at 6617:22–6619:11. Primary accounts are typically used to connect with friends and family, but Young Users use finstas for matters they “want to keep . . . separate from what they do with their friends and family.” *Id.* The accounts are easy to operate together: a user can create and access additional accounts through the primary one. Ex. 85 at 1318:19–1319:3. With finstas, it is possible “for one account to be following the age rules . . . and one account not to.” Ex. 62 at 3944:20–24. A Young User whose primary account carried parental controls could open a finsta that escaped them. *Id.* at 3945:4–8. Meta has tried to extend the same limits to all accounts linked to a Teen Account—but, as it concedes, teens work around that barrier by creating unlinked finstas and lying about their ages. Ex. 101 at 5612:17–5614:8.

Like other features at issue in this litigation, Meta targeted finstas as “part of Growth efforts . . . because, obviously, it leads to more . . . time spent” on Instagram.

Ex. 62 at 3944:10–24. Meta pitched it as a source of “identity exploration,” a way for Young Users to “experiment” in private. Ex. 114 at 2500:18–2502:10. The pitch worked. These accounts are “pretty popular among teens,” and their use is “definitely higher [among Young Users] than adults.” Ex. 109 at 6618:18–20, 6621:15–6622:18. The accounts are also “hard to find,” so Young Users can do things on them their parents never learn about—with tragic consequences. Ex. 85 at 1318:19–1319:22. A former consultant for the BEEF survey spoke with parents whose children had died due, at least in part, to the children’s Instagram use. *Id.* at 1319:3–8. And “every parent” he spoke with mentioned finstas. *Id.* “[A]ll the harm happened in a finsta account that the parent discovered after the child passed.” *Id.*

8. Meta’s deployment of notifications and push features is unfair to Young Users.

Meta, in its quest to increase the time Young Users spend on its Platforms, came up with a system it called “badging,” which “just means notifications, basically. It’s nudging people to come to the app.” Ex. 62 at 3905:16–25. In deciding how to deploy notifications most effectively against Young Users, one team proposed sending teens badging or “[p]ush notifications. At night.” Ex. 62 at 3761:11–3763:6.¹⁸

Meta also knew full well that these notifications caused users to feel like they could not control their “compulsive use” of social media. Ex. 80 at 1207:13–1208:8. With the stacking of different kinds of notifications to continue to prompt use, Meta created a “[d]ark pattern that makes it difficult to complete a task that, in this case,

¹⁸ Many years later, Meta did appear to walk back the push notifications at night with the creation of Teen Accounts that allowed parents to limit the times in which Meta sent notifications. Ex. 106 at 6349:20–6350:6.

is in the best interest of the teen” users. *Id.* at 1208:9–13. The notifications were so hard on teens that, when asked, teens unanimously told Meta they wanted notifications blocked during school and work hours. Ex. 115 at 6. Meta shelved a modification that would have accomplished this because it “focused on the negative.” *Id.* at 10.

9. Meta’s development of ineffective time-management tools is unfair to Young Users.

After extensive public outcry and the onset of litigation, Meta realized that it had to shift its approach to exploiting Young Users—it needed to project the image that it cared. So, for quite some time, this was its “primary approach to Mental Well-being products”:

- “Up sells & contextual nudges: We pursued an opt in strategy that relied on teens recognizing their behavior and adopting new controls. However, adoption has been modest at 1.8% for Take a Break and 6.7% for Quiet Mode.”
- “Conservative triggering and targeting: To minimize ecosystem impact, we kept a high bar on which users were targeted and how often, with long cooldowns. As a result, surveys show awareness of our [well-being] products is modest—only 33% of teens are aware of Take a Break and 44% for Quiet Mode”
- “Low friction UX: We prioritized UX and ease of app use over effectiveness. *By design, our [well-being] products served as proof points but weren’t effective at reducing behaviors.* As a result, we see a low honor rate (5.6%) for break reminders and 2% per adopter reduction . . . with Quiet Mode. In contrast, TikTok requires a passcode to dismiss their default on Daily Limit product.”

Ex. 116 at 3 (emphasis added). Put bluntly, the products were “not designed to help a teenager reduce their use,” but instead they were designed “for the press release and the press cycle that they get from it.” Ex. 80 at 993:4–994:10. In fact, there “was

a relationship between a press article that got traction about something bad that happened, and then [Meta] would get a few safety engineers to go work on something, so then the company could then announce that.” Ex. 85 at 1286:14–22.

* * * *

These features point in one direction. Meta designed its Platforms to cause Young Users significant injury, and Young Users cannot reasonably avoid that injury, because Meta hides, destroys, or obscures the information they would need to choose freely. *Pointbreak Media, LLC*, 376 F. Supp. 3d at 1285. Meta’s interest in growth and profit cannot outweigh these risks to Young Users—risks that have in some cases ended in death. *Angelo*, 275 So. 3d at 755; Ex. 85 at 1319:3–8. These acts and practices are therefore unfair under the definition used by some Florida courts and the FTC. *Angelo*, 275 So. 3d at 755; *Porsche Cars*, 140 So. 3d at 1096–98. And they are unfair under the older definition used by other Florida courts that examines whether the acts and practices offend “public policy” and are “immoral, unethical, oppressive, unscrupulous or substantially injurious to consumers.” *PNR, Inc.*, 842 So. 2d at 777.

Meta also acted unconscionably. By deliberately designing its products to exploit the psychological vulnerabilities of its youngest and most vulnerable users, all in the name of growth and profit, it exceeded the bounds of what is just, decent, and reasonable. *Gordon*, 393 P.3d at 1128.

Thus, Meta must be stopped from further exploiting Florida's children—particularly now, when they are among the only children in the country that a judgment or consent decree does not prevent Meta from harming.

II. Meta Should Be Enjoined.

Because the Attorney General is substantially likely to succeed on the merits, a temporary injunction should issue as to Meta's actions in, targeting, or affecting users in Florida. *Bilotti*, 267 So. 3d at 3. The Attorney General does not seek an injunction that extends beyond Florida.

At a minimum, the injunction must meaningfully stop Meta from perpetuating the harms described above. Thus, the Attorney General seeks temporary injunctive relief. This relief should enjoin Meta (1) to remedy deceptive statements, (2) to remove Young Users in Florida under the age of 14 from its Platforms, and (3) to reduce Teen Users' addictive, injurious, and problematic use of its Platforms. The requested relief tracks relevant aspects of the injunctive relief in the multidistrict-litigation settlement about which Meta is so proud that it has vigorously urged competitors to join with Meta and make these changes universal. Ex. 2, Source No. 4. It also tracks relevant aspects of the injunction in the New Mexico judgment. Thus, the requested injunction should, for the most part, pose minimal burdens on Meta while keeping Florida up to date with the "new industry standard." *Id.*

A. Meta should be enjoined to make changes similar to those in the multidistrict-litigation settlement.

At a minimum, Meta should be enjoined to make the following changes that are the same as or nearly identical to changes required in the multidistrict-litigation

settlement—changes that Meta touts as creating a “new industry standard” that Meta “want[s] to ensure teens benefit from.” *Id.*

1. Meta must verify user age and remove users under the age of 14.

When verifying and removing users under the age of 14,¹⁹ Meta shall take the following actions:

1. Assess all posts, comments, or other actions by the user that may provide reliable indicia of the user’s age or under-14 status. Ex. 5, Settlement Agreement § II.A.6.b.i.B, *In re Social Media*, No. 22-MD-03047-YGR.
2. Provide a simplified reporting experience to report suspected under-14 users from within Meta’s Platforms. *Id.* § II.A.6.b.i.C.
3. Review the accounts in the friend networks of the underage users whose accounts it has suspended or deleted to assess whether any of their friends are under 14 years of age. *Id.* § II.A.6.b.i.D.

2. Meta must modify its Platforms to reduce addictive, injurious, and problematic use by Teen Users.

Meta should be enjoined to take the following steps to reduce addictive, injurious, and problematic use:

1. Adopt and apply an age assurance framework to every Teen User, apply Meta’s default protections for Teen Users if they state their age is under 18, protect them from bad actors and inappropriate content for 14 days even if they say their age is over 18, and if the users have not had their age assessed after 14 days, treat them as Teen Users regardless of their stated age. *Id.* § II.A.10.
2. Default Teen Users to a 2-hour cap on cumulative daily use across its Platforms. *Id.* § II.B.3.a.i.

¹⁹ The settlement and New Mexico’s judgment focused on removing users under the age of 13. Ex. 5, Settlement Agreement § II.A, *In re Social Media*, No. 22-MD-03047-YGR; Ex. 3, Judgment ¶ 142.a, *New Mexico*, No. D-101-CV-2023-02838. However, in Florida, social media platforms are prohibited from permitting minors younger than 14 from becoming account holders. § 501.1736, Fla. Stat. (2026).

3. Interrupt use with mandatory pauses at 60 and 90 minutes and a notice every 15 minutes of continuous use. *Id.* § II.B.5.a.
4. Identify secondary accounts so that a minor cannot evade the limits by opening a second account. *See id.* § II.B.6.
5. Implement content policies to protect Teen Users from bullying and harassment. *Id.* § II.E.1.
6. Default Teen Users into content settings appropriate for their age. *Id.*
7. Respond to a Teen User's report of harmful content within 6 hours in at least 90% of cases. *Id.* § II.E.5.b.
8. Give Supervising Parents usage data, notice when an adult first messages their child, and alerts on repeated searches for suicide, self-harm, or eating-disorder content. *Id.* § II.G.1–2.

B. Meta should be enjoined to make changes similar to those ordered in New Mexico.

At a minimum, Meta should be enjoined to make the following changes that are the same as or nearly identical to changes required in the New Mexico judgment.

1. Meta should remedy past deceptions with clear statements about its Platforms.

Meta should be required to build a banner screen on the Platforms, which is reviewed, edited, and approved by the Attorney General, and displayed to all adult users in Florida at least once a month and all Teen Users at least once a week that provides a link to the following materials: (a) Meta's Transparency Center; (b) Meta's Parents Guide; (c) Meta's Safety Center; (d) Meta's Help Center; (e) Meta's Teen Accounts Information Webpage, where a clear explanation of all features and protections shall be provided in adolescent-centric verbiage; and (f) any other comparable features or sources of information that address safety or security topics. *See Ex. 3, Judgment ¶ 180, New Mexico*, No. D-101-CV-2023-02838.

Meta should be required to provide information screens on the Platforms, which have been reviewed, edited, and approved by the Attorney General, that are displayed to all new Teen Users once a day for 30 days after the Teen User joins the Platforms that explain one or more of the following: (a) an aspect of best practices for safe use of the Platforms; (b) available tools to address inappropriate content and behavior; (c) the concept of rabbit holing and ways to reset the algorithm to address the issue; and, (d) tools to avoid problematic use. *See id.* ¶ 181.

2. Meta must verify user age and remove users under the age of 14.

When verifying and removing users under the age of 14, Meta shall take the following actions:

1. Continue to improve Meta’s age assurance models and tools in Florida. These efforts shall include: (a) using artificial intelligence tools to enhance Meta’s heuristics, including by incorporating additional signals; and (b) attempting to develop a dedicated under-14-years-of-age prediction model (using reasonable best efforts). Ex. 3, Judgment ¶ 142.a, *New Mexico*, No. D-101-CV-2023-02838.
2. Request proof of age for Instagram and Facebook accounts belonging to users that Meta’s systems know or predict to be under the age of 14, and mark for deletion the accounts of those who do not verify their age within 30 days, consistent with any legal-hold obligations. *Id.* ¶ 142.b.
3. Treat users who Meta has reason to believe are under 14 or under 18 years of age as under those respective ages unless the users age verify. *Id.* ¶ 142.d.
4. Partner with schools and child safety organizations in Florida to create a reporting portal where administrators and organizers can flag suspected accounts where users may be under 14 years of age across any social media platform—and promptly review all reported accounts. *Id.* ¶ 142.f.
5. Delete all accounts and personal information collected from accounts belonging to underage users. *Id.* ¶ 142.h.

3. Meta must modify its Platforms to reduce addictive, injurious, and problematic use by Teen Users.

Meta should be enjoined to take the following steps to reduce addictive and problematic use:

1. Restrict the display of Teen Accounts so that they are not recommended to unconnected adults. *Id.* ¶ 143.b.
2. Prevent unconnected adults from messaging Teen Users. *Id.* ¶ 143.c.
3. Develop a one-strike rule for adult users who engage in child sexual exploitation, disable all accounts related to the offender, and prevent new account creation by that offender. *Id.* ¶ 154.
4. Require human review of every child-sexual-exploitation report within 48 hours of submission through a clearly visible, forward-facing reporting mechanism available in the Platforms. *See id.* ¶ 155.
5. Provide prompt feedback on every report of unwanted sexual advances made by submission through a clearly visible, forward-facing reporting mechanism available in the Platforms. *Id.* ¶ 156.
6. Require human review of all CyberTip reports of new CSAM involving Florida users that is expedited and completed before referral to the National Center for Missing & Exploited Children (“NCMEC”). *Id.* ¶ 192.
7. Prohibit Teen Users from sending or receiving images containing nudity identified as violating Meta’s policies and maintain blurring where nudity is suspected. *Id.* ¶ 153.
8. Continue to display alerts to users under the age of 18 when they are at risk of potential sextortion or contacted by suspicious accounts. *Id.* ¶ 151.
9. Strengthen sextortion alerts by strongly encouraging Teen Users to end the communication and significantly de-emphasizing any option to continue the communication. *Id.*
10. Participate in semiannual law-enforcement trainings in Florida on internet crimes against children, funded by Meta, with content developed by collaboration between Meta and the Attorney General. *Id.* ¶ 189.

C. Meta should be enjoined to make additional changes needed to fully protect Florida’s children.

The Attorney General seeks certain injunctive relief that is more restrictive than or goes beyond the scope of the relief consented to in the multidistrict-litigation settlement and required by the New Mexico judgment.

1. Meta should be prohibited from making further deceptive statements or omissions and required to remedy past deceptions.

Meta should be prohibited from making false statements, misrepresenting information, or misleading by omission in the following categories of representations about its Platforms:

1. The Platforms are not psychologically or physically harmful for Young Users.
2. The Platforms are not addictive and not designed to cause extensive or compulsive use.
3. Meta protects Young Users from harmful content on its Platforms.
4. Meta effectively excludes users under the age of 13 from its Platforms.
5. Meta prioritizes user well-being and safety over user engagement and company growth.
6. Meta does not place a monetary value on Young Users.
7. Meta does not restrict access to internal research findings.
8. Meta uses internal research findings to improve product safety on a regular basis.

Meta should be required to preserve *all* research and data used to make or evaluate its claims about those eight categories. Meta should be required to correct false and deceptive statements that remain publicly accessible in forums and

documents under its control, including on websites, safety reports, parent resources, and other consumer- and regulator-facing materials.

In addition to the relief provided in the New Mexico judgment discussed above, in a prominent location on its commercial interface or advertisements, Meta should be required to make this disclosure: The U.S. Surgeon General advised that evidence does not establish that social media is sufficiently safe for children and adolescents. Certain features used by Instagram and Facebook—including personalized recommendations, infinite scrolling, autoplay, push notifications, and public popularity metrics—are designed to increase engagement and may contribute to excessive or problematic use by children or adolescents. Depending on the user and manner of use, children or adolescents may also face increased risks of disrupted sleep, symptoms of anxiety, symptoms of depression, symptoms of eating-disorders, and self-harm.

The disclosure should be made in the following circumstances:

1. At account creation,
2. When a Teen User signs into his or her account,
3. In Meta’s advertising about its Platforms,
4. In a safety or parental-control interface, and
5. When Teen Users reach the daily usage cap identified above in Part II.A.2 and monthly usage caps identified below in Part II.C.3.

Finally, to protect against further harm resulting from Meta’s deceptive practices, in Florida, Meta must be prohibited from targeting Young Users with advertisements about its Platforms and from designing advertising about the

Platforms intended to appeal to Young Users or increase Young User engagement on the Platforms.

2. Meta must verify user age and remove users under the age of 14.

In addition to the relief discussed above, Meta should be required to do the following:

1. Develop and implement the tools needed to find and remove all accounts for all users in Florida under the age of 14.
2. Report, in its quarterly reports to this Court, the number of Florida users that Meta estimates are under the age of 14 who used Meta's Platforms in the preceding quarter, the number of suspected or known underage user accounts that Meta suspended, the number of suspected or known underage user accounts that Meta deleted, and the reason why Meta did not suspend or delete any remaining suspected or known underage user accounts.

If within 30 days of the entry of this injunction, Meta cannot implement the measures for user-age verification and removal in this and the prior sections, Meta must cease to allow any Young Users access to its Platforms in Florida until these measures are implemented.

3. Meta must modify its Platforms to reduce addictive, injurious, and problematic use by Teen Users.

Meta should be enjoined to take the following steps, many of which resemble (but are more restrictive than) the relief in the multidistrict-litigation settlement and New Mexico judgment:

1. Default Teen Users' accounts to a quiet mode from 9 p.m. to 8 a.m. year-round, and from 8 a.m. to 3 p.m. on academic-year weekdays, that prevents Teen Users from accessing any aspect of the Platforms aside from settings and suppresses all notifications except those related to urgent security or hazard alerts. *See also* Ex. 5, Settlement Agreement

§§ II.B.2, II.B.4, *In re Social Media*, No. 22-MD-03047-YGR; Ex. 3, Judgment ¶ 168, *New Mexico*, No. D-101-CV-2023-02838.

2. Hide like, comment, and reaction counts from Teen Users by default for any content the Teen User posts or views. Allow only the Supervising Parents of the Teen Users to opt the Teen Users' accounts into viewing like, comment, and reaction counts. Prompt Teen Users whose parents have opted for them to view like, comment, and reaction counts with an offer every 30 days to opt-out of viewing these counts. *See also* Ex. 5, Settlement Agreement §§ II.D.1, *In re Social Media*, No. 22-MD-03047-YGR; Ex. 3, Judgment ¶ 169, *New Mexico*, No. D-101-CV-2023-02838.
3. Enable Supervising Parents or Teen Users to impose more restrictive settings than those set by the defaults but *not* to impose less restrictive settings than those set by the defaults. *See also* Ex. 5, Settlement Agreement § II.B.5.a, *In re Social Media*, No. 22-MD-03047-YGR.
4. Prompt Teen Users every 3 days to switch to a non-personalized feed, and do not permit the prompt to be disabled. *See also id.* § II.C.2.
5. Cap Teen Users to a mandatory usage cap of not more than 60 hours per month cumulatively across Facebook and Instagram, this cap includes long-form content and messaging. *See also* Ex. 3, Judgment ¶ 170, *New Mexico*, No. D-101-CV-2023-02838.
6. Default Teen Users into disabled Autoplay and Infinite Scroll that can be enabled only by a Supervising Parent. *See also* Ex. 5, Settlement Agreement §§ I.J, PP, II.C.3–4, *In re Social Media*, No. 22-MD-03047-YGR (creating an optional setting that restricts Autoplay).
7. Monitor for and investigate accounts of adult users who make inappropriate comments on posts by Young Users, particularly comments about the Young User's appearance, to confirm that those adult users are not violating Meta's Community Standards.
8. Prohibit third-party advertisements of any kind from displaying on Young Users' accounts, messages, feeds, Reels, or any other method by which Young Users access and use the Platforms.
9. Monitor the number of accounts used by Teen Users, including accounts that are not affiliated with a principal account and report to Supervising Parents on a monthly basis about all accounts used by Teen Users. *See also id.* § II.B.6.
10. Disable cosmetic-procedure filters and refrain from adopting the equivalent tool in some other form. *Id.* § II.D.2.

* * * *

Finally, Meta should also be directed that it may not discontinue or diminish these minimum standards without the Attorney General’s stipulation or a Court order. *See* Ex. 3, Judgment ¶ 145, *New Mexico*, No. D-101-CV-2023-02838; *see also* Ex. 5, Settlement Agreement § II.E.2, *In re Social Media*, No. 22-MD-03047-YGR. And Meta should be required to submit a report to this Court on a quarterly basis that contains its progress complying with all injunctive-relief provisions, statistics demonstrating compliance, and an explanation for those statistics and for any lack of compliance. *See also* Ex. 3, Judgment ¶ 132, *New Mexico*, No. D-101-CV-2023-02838.

For the Court’s convenience, the following table shows that the relief the Attorney General seeks is technically feasible and administrable—Meta has already built, agreed to operate, or been ordered to operate a variation of nearly all the relief that the Attorney General requests.

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida’s request
DECEPTION			
Past affirmative misrepresentations about platform safety, addictiveness, and harm	N/A	N/A.	MORE Bars eight enumerated categories of representation, requires preservation of underlying research, and correction of past deceptions. Part II.C.1.

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
Risk of future misrepresentations	Enjoins false, misleading, or deceptive representations about the effect or efficacy of teen safety features. Applies only to representations made on or after the Effective Date. § II.E.4.a.	Court-designed banner screen for all adults monthly and all under-18 users weekly, linking six categories of safety material, ¶ 180; daily information screens for new under-18 users, ¶ 181.	MORE The same mechanisms as in New Mexico, subject to Attorney General review and approval, Part II.B.1, plus a specified Surgeon General disclosure at account creation, sign-in, in advertising, in the parental-control interface, and at the usage cap, Part II.C.1.

UNDER-14 ACCESS AND AGE ASSURANCE

Age-assurance framework and continuous improvement	Age Assurance Framework, § II.A.1; third-party testing and certification, § II.A.2; U18 false-positive-rate ceilings, § II.A.6.a; continuous improvement. § II.A.11.	Continue improving age-assurance models and tools, including AI-enhanced heuristics and best efforts toward a dedicated under-13 prediction model. ¶ 142.a.	SAME as New Mexico—but for U14 Parts II.A.1, II.B.2.
Proof of age where the platform predicts a user is underage	U13 detection methods, including soft-matching models and checkpointing. § II.A.6.b.i.A.	Proactively request proof of age and mark unverified accounts for deletion within 30 days. ¶ 142.b.	SAME as New Mexico—but for U14 Part II.B.2.

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
Assessment of posts, comments, and profile content for age indicia	Assess all posts, comments, or other actions providing reliable indicia of age; absent indicia, presume the user is U13. § II.A.6.b.i.B.	Proactively assess profiles, images, posts, and comments for an admitted age inconsistent with the stated age. ¶ 142.c.	SAME—but for U14 Parts II.A.1.
Treatment of users whose age cannot be verified	Default protections for 14 days after account creation regardless of stated age. § II.A.10.a–b.	Treat as under 13 or under 18, respectively, unless and until the user age-verifies. ¶ 142.d.	SAME as New Mexico—but for U14 Part II.B.2.
Friend-network review after an underage removal	Review the friend networks of deleted accounts to identify additional U13s. § II.A.6.b.i.D.	Review accounts in the user's friend network after age-related suspension or deletion. ¶ 142.e.	SAME—but for U14 Part II.A.1.
Ease of reporting underage users	Simplified in-app reporting flow plus the existing web-based underage reporting tool. § II.A.6.b.i.C.	Reduce the number of steps and the information required to report an underage account. ¶ 142.g.	SAME—but for U14 Parts II.A.1.
School and child-safety-organization reporting portal	N/A.	Partner with schools or a child safety organization to create a portal where	SAME—but for U14 Part II.B.2.

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
		administrators can flag suspected underage accounts, with prompt review. ¶ 142.f.	
Deletion of underage accounts and the data collected from them	Data minimization and security limits on age-assurance data, § II.A.8; no deletion mandate tied to underage removal.	Delete the accounts and all personal information collected from accounts belonging to underage users. ¶ 142.h.	SAME as New Mexico—but for U14 Part II.B.2.
Removal targets, verification, and consequences of non-performance	Year 2 and Year 3 Enforcement Targets set by Meta, measured on best efforts, reported to the Independent Auditor, § II.A.6.b.ii.C–F; annual certification of enforced U13s. § II.A.6.b.v.	N/A.	MORE Requires the tools to find and remove all Florida users under 14; quarterly reporting to this Court of estimated underage users, suspensions, and deletions; and, if the measures are not implemented within 30 days, cessation of Young User access in Florida until they are. Part II.C.2.
ADDICTIVE, INJURIOUS, AND PROBLEMATIC USE			
Night-time access	Phase I: access blocked 12 a.m.–6 a.m. and push	Eliminate push notifications 10 p.m.–7 a.m.	MORE

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
	notifications disabled 10 p.m.–7 a.m., § II.B.2.a.i–ii; Phase II: access blocked 10 p.m.–7 a.m., § II.B.2.b.i; messaging and settings remain available throughout, § II.B.2.a.iii.	daily. ¶ 168.a. Access is not restricted.	Quiet mode 9 p.m.–8 a.m. that prevents access to everything except settings and suppresses all notifications except urgent security or hazard alerts—broader hours than either source, and a restriction on access rather than notifications alone. Part II.C.3.
School-hours use	Push notifications disabled during School Hours, defined as 8 a.m.–3 p.m. Monday through Friday. §§ I.AAA, II.B.4.a. Messaging, account-security, and platform-integrity notifications are carved out.	Eliminate push notifications 8 a.m.–3 p.m. on academic-year weekdays. ¶ 168.b.	MORE Same hours, but quiet mode also prevents access to messaging and content rather than suppressing notifications alone. Part II.C.3.
Time limits	Phase I: two hours per day cumulative across Meta platforms. § II.B.3.a.i. Phase II: 60 minutes per app, capped	No daily limit. A monthly cap of 90 hours cumulative across Facebook and Instagram. ¶ 170.	MORE Same two-hour daily cap from MDL, Part II.A.2, and the New Mexico monthly cap tightened from 90

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
	at 120 minutes cumulative. § II.B.3.b.i. Long-form content, messaging, and settings are excluded.		hours to 60. Part II.C.3.
Mandatory interruption of continuous use	Productive pauses at 60 and 90 minutes of cumulative daily use, with notices at 15 minutes of continuous use. § II.B.5.a.	N/A.	SAME as MDL Pauses at 60 and 90 minutes, plus a notice every 15 minutes of continuous use. Part II.A.2.
Secondary and unlinked accounts used to evade limits	Identification of suspected secondary accounts and annual data to the Independent Auditor. § II.B.6.a–c.	N/A.	MORE The identification obligation, Part II.A.2, plus monthly reporting to Supervising Parents on every account a Teen User operates. Part II.C.3.
Like, reaction, and comment counts	Like and reaction counts disabled by default for Teen Users; the default may be changed with Supervising Parent approval. § II.D.1. Comment counts are not addressed.	Like counts hidden by default for under-18 users; override permitted only with parent or guardian permission. ¶ 169. Comment counts are not addressed.	MORE The same default and parental override as the MDL settlement, extended to comment counts, plus a prompt to opted-in Teen Users every 30 days to opt back out. Part II.C.3.

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
Appearance-altering and cosmetic-procedure filters	Teen Users disabled from applying Cosmetic Procedure Filters. § II.D.2; <i>see</i> § I.X (defining the term).	N/A.	MORE The prohibition, extended so that Meta may not reintroduce the equivalent tool in another form. Part II.C.3.
Autoplay	Autoplay is defined, § I.J. Restricting it is included within Optional Protective Settings, § I.PP, which Teen Users may elect and Supervising Parents may enable. § II.C.3–4. It is an opt-in setting, not a default.	N/A.	MORE Disabled by default, opt-in only by a Supervising Parent—a default rather than the settlement's opt-in setting. Part II.C.3.
Infinite Scroll	N/A.	N/A.	NEW Disabled by default on the same terms as Autoplay. Part II.C.3.
Algorithmic feed and the non-personalized alternative	Reasonably Accessible option to select a Non-Personalized Feed within four months, § II.C.1; Clear and Conspicuous	N/A.	MORE A prompt every three days to switch to a non-personalized feed, which the Teen User may not disable. The

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
	prompt within 10 days of account identification and every 90 days thereafter, § II.C.2; parental control over the default. § II.C.4.		settlement prompts every 90 days and lets the Teen User turn the reminders off. Part II.C.3.
Asymmetry of parental and teen control over defaults	Teen-User defaults for Night Access Mode, Daily Limit, and School Mode cannot be modified to a less restrictive setting without Supervising Parent approval, § II.B.2.a.v, II.B.3.a.iv, II.B.4.b, and a parent approving a change must set its duration. § II.G.7.	Override of the like-count default permitted only with parent or guardian permission. ¶ 169.	MORE Parents or Teen Users may impose settings more restrictive than the defaults but may never impose less restrictive ones—no parental override in either direction below the floor. Part II.C.3.
Advertising directed at young users	N/A.	N/A.	NEW No targeting of Young Users with advertising about the Platforms and no designing such advertising to appeal to them, Part II.C.1; no third-party advertising on

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
			Young Users' accounts, messages, feeds, or Reels. Part II.C.3.
Bullying and harassment	Content policies designed to help prevent targeting Teen Users with content that violates Meta's Community Standards relating to bullying and harassment. § II.E.1.b.	N/A.	SAME Part II.A.2.
Default content settings and age-appropriate experiences	Teen Users defaulted into content settings designed to provide Age Appropriate Experiences. § II.E.1.d.	N/A.	SAME Part II.A.2.
Discoverability of teen accounts by unconnected adults	Limit account discoverability between Teen Users and Potentially Suspicious Accounts, § II.F.1.a; default Teen Users into private accounts on Instagram. § II.F.1.b.	Maintain private-by-default for under-18 users, ¶ 143.a; no under-18 account recommended to an adult regardless of account status. ¶ 143.b.	SAME as New Mexico Teen Accounts not displayed or recommended to unconnected adults. Part II.B.3.

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
Adult-to-minor messaging	Clear and Conspicuous caution notices when a Potentially Suspicious Account opens a thread with a Teen User, § II.F.4.a; parental notice. § II.F.4.b.	No unconnected adult may message a user under 18. ¶ 143.c.	SAME as New Mexico New Mexico's prohibition rather than the settlement's warning. Part II.B.3.
Sextortion and suspicious-contact alerts	Caution notices on suspicious message threads. § II.F.4.a.	Continue displaying at-risk alerts, and modify them so the minor is strongly encouraged to end the communication and any option to continue is significantly de-emphasized, ¶ 151; maintain and expand sextortion detection. ¶ 152.	SAME as New Mexico ¶ 151 in full, including the interface requirement. Part II.B.3.
Adult offenders who engage in child sexual exploitation	N/A.	One-strike policy: disable all accounts related to the offender and prevent new account creation using Meta's most advanced	SAME One-strike enforcement as ordered in New Mexico. Part II.B.3.

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
		matching tools. ¶ 154.	
Nudity in teen messaging	Content policies limiting teen exposure to Age Inappropriate Content. § II.E.1.a, .d.	Prohibit under-18 users from sending or receiving policy-violating nudity; maintain blurring where nudity is suspected. ¶ 153.	SAME as New Mexico The nudity prohibition and the blurring requirement as ordered. Part II.B.3.
Reporting mechanisms and response times for harmful content	In-app reporting tools across enumerated harm categories, § II.E.5.a; response on Potentially Harmful Reported Content within six hours in at least 90% of cases, § II.E.5.b; defined response triggers. § II.E.5.c.	Clearly visible, forward-facing child-sexual-exploitation reporting mechanism with human review within 48 hours. ¶ 155.	SAME The settlement's six-hour/90% standard, Part II.A.2 and New Mexico's 48-hour human review and prompt-feedback requirements. Part II.B.3.
Referral of child sexual abuse material to NCMEC	N/A.	Human review of all CyberTip reports of new CSAM involving New Mexico users, expedited and completed before referral to NCMEC. ¶ 192.	SAME For Florida users. Part II.B.3.

Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
Law-enforcement capacity	N/A.	Meta-funded semiannual law-enforcement trainings on internet crimes against children, developed collaboratively with the State. ¶ 189.	SAME Developed with the Attorney General. Part II.B.3.
Adult commentary on young users' posts	N/A.	N/A.	NEW Monitor and investigate the adult accounts with inappropriate comments on Young Users' accounts, particularly where the comments concern a Young User's appearance, to confirm compliance with Meta's Community Standards. Part II.C.3.

PARENTAL SUPERVISION AND COMPLIANCE

Information to Supervising Parents	Information on supervision controls, § II.G.1; daily notice of teen activity, § II.G.2; prompts, checkups, and enrollment	N/A.	SAME Usage data, notice when an adult first messages the child, and alerts on repeated searches for suicide, self-harm, or eating-
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Harm or issue addressed	MDL settlement (Ex. 5)	New Mexico judgment (Ex. 3)	Florida's request
	efforts. § II.G.3–6, 8.		disorder content. Part II.A.2.
Compliance reporting and oversight	Independent Auditor selected by Meta and the State Committee, with a defined scope of work, access rights, draft and final reports, and corrective action plans. §§ III.A–L.	Semiannual written reports to the Court and the State, filed on the docket by June 30 and December 31 during the five-year Abatement Period. ¶¶ 131–32.	MORE Quarterly reports to this Court on estimated Florida users under 14 and on suspensions and deletions. Part II.C.2.
Preservation of the standards ordered	Meta must maintain features at least as effective and continuously improve them, but may test and may replace a feature with one reasonably expected to accomplish the same goals. § II.E.2.	Minimum standards of protection and related features may not be discontinued or diminished without written stipulation of the State or order of the Court. ¶ 145.	SAME as New Mexico No discontinuation or diminution without the Attorney General's stipulation or a Court order. Part II.C.3.

CONCLUSION

WHEREFORE, the Attorney General respectfully requests that the Court grant this motion and issue the requested temporary injunction.

Dated October 7, 2026.

Respectfully submitted,

JAMES UTHMEIER
Attorney General

RYAN NEWMAN
Chief Deputy Attorney General

JASON HILBORN
Deputy Attorney General
Civil Division

KELLER POSTMAN LLC
John J. Snidow (*pro hac vice*)
1101 Connecticut Avenue, N.W.,
Suite 1100
Washington, D.C. 20036
Telephone: (202) 742-5404
Email: jj.snidow@kellerpostman.com

Miranda Jones (*pro hac vice*)
150 N. Riverside Plaza, Suite 4100
Chicago, IL 60606
Telephone: (312) 741-5220
Email:
miranda.jones@kellerpostman.com

/s/ Ashley Keller
Ashley Keller (FL Bar No. 1029118)
KELLER POSTMAN LLC
2333 Ponce de Leon Blvd, Suite R240
Coral Gables, Florida 33134
Telephone: (833) 633-0118
Email: ack@kellerpostman.com

Victoria Ann Butler (FL Bar No. 861250)
OFFICE OF THE FLORIDA ATTORNEY
GENERAL
Director of Consumer Protection
Litigation
3507 East Frontage Road, Suite 325
Tampa, Florida 33607
Telephone: (813) 287-7950
Email:
victoria.butler@myfloridalegal.com

Donna Cecilia Valin (FL Bar No. 96687)
*Special Counsel, Assistant Attorney
General*
Consumer Protection Division
135 West Central Blvd.
Orlando, Florida 32801
Telephone: (407) 316-4840
Email: donna.valin@myfloridalegal.com

Karen E. Berger (FL Bar No. 72991)
*Special Counsel, Assistant Attorney
General*
Consumer Protection Division
110 SE 6th Street, 10th Floor
Fort Lauderdale, Florida 33301
Telephone: (954) 712-4600
Email: karen.berger@myfloridalegal.com

*Attorneys for Office of the Attorney General,
State of Florida, Department of Legal Affairs*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was filed electronically and was sent by E-Mail from the Florida Courts' E-Filing Portal system, unless otherwise noted below, on all counsel or parties of record listed below on October 7, 2026.

/s/ Ashley Keller
Ashley Keller