



December 5, 2022

VIA EMAIL

Patrick Morrissey
West Virginia Attorney General
Doug Buffington
Chief Deputy Attorney General
State Capitol Building 1, Room E-26
1900 Kanawha Boulevard East
Charleston, WV 25305

Dear General Morrissey and Chief Deputy Buffington:

Thank you for your letter dated October 13, 2022 requesting information about TikTok's approach to combating illicit drug activity on our platform. We recognize our responsibility to help maintain a safe and welcoming environment for our community. As detailed below, all content and accounts on our platform must abide by our Community Guidelines, which provide guidance on what is and is not allowed on TikTok. These Guidelines reflect our zero-tolerance policy for the sale, trade, promotion, use, and the depiction of drugs, including controlled substances like fentanyl. TikTok takes a multifaceted approach in combating illegal drugs on our platform, and the following provides an overview of our efforts and responses to your five questions.

Our Company

TikTok is a global short-form video platform that more than 1 billion people use to express themselves creatively, share their talent, enjoy entertaining content, and engage with a diverse community. Our mission is to inspire creativity and bring joy to people around the world.

We are committed to being an industry leader in transparency and accountability. We voluntarily release regular transparency [reports](#) that disclose the volume and nature of content removed for violating our Community Guidelines, as well as the volume of both law enforcement requests we receive and our responses to those requests. We routinely provide public updates on our efforts to continuously improve [platform safety](#).

In 2020, we opened our [Transparency and Accountability Center](#), a space created to share information about how we moderate content to help keep TikTok safe and secure. Recently, we have begun welcoming guests to our center in Los Angeles and anticipate offering tours soon at our upcoming center in Washington, D.C.

TikTok Inc.
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Our Commitment to Safety

TikTok is a platform that brings joy to millions of people in the United States, and we are committed to promoting a safe and positive app environment for all users.

Our [Community Guidelines](#) establish a set of norms and common code of conduct; they provide guidance on what is and is not allowed on TikTok to help create a welcoming and safe space for all. These Guidelines apply to everyone and to everything on TikTok. We will remove any content – including video, audio, livestream, images, comments, links or other text – that violates these Guidelines, and we will suspend or ban accounts involved in severe or repeated violations. Our goal is to help protect the safety of our community and ensure that we evaluate and address content in a transparent and consistent manner.

In addition, any circumstances that involve any instance of a threat of real-world harm to human life that is specific, credible, and imminent may be reported to law enforcement authorities.

Answers to Your Five Questions

First, what is your strategy to combat drug dealing via your social media services?

TikTok works to ensure that our platform does not enable harmful activities that violate laws or regulations. We have a zero-tolerance policy for the sale, trade, promotion, use, and the depiction of drugs, including controlled substances like fentanyl, for both organic and paid content. While some of our policies make exceptions for satire or comedy, our policies governing content that depicts drugs have no exceptions because of the potential harm and normalization that can follow. Additionally, we do not promote content that discusses controlled substances (such as adult humor) in our For You feed to help ensure that it is an appropriate and comfortable place for all audiences.

We do not allow individuals or organizations on our platform who promote, engage in, or seek to recruit others for violent or illegal activities. We remove accounts of such individuals and organizations from our platform, including criminal organizations, such as cartels. More specifically, our Community Guidelines prohibit criminal activities, which cover a spectrum of acts punishable by law, including theft, assault, human exploitation, counterfeiting, and other harmful behavior. To prevent such behavior from being normalized, glorified, imitated, or facilitated, we remove content that promotes or enables criminal activities.



Consistent with this approach, TikTok prohibits ads on the following (as disclosed on our public-facing Advertising Policies (<https://ads.tiktok.com/help/article?aid=9550>)):

Drugs and paraphernalia

- Promotion, sale, solicitation of, or facilitation of access to illegal drugs, controlled drugs, prescription drugs (prohibited in some markets), drugs for the purpose of recreation, homeopathy, enhancement, performance, including weight loss.
- Promotion, sale, solicitation of, or facilitation of access to drug paraphernalia, or accessories or supplies any of such.
- Promotion of or facilitation of access to unauthorized drugstores, pharmacies, or dispensaries.
- Depiction of or featuring drug use, drug abuse or prescription drug abuse.
- Depiction of or featuring drugs-related words, symbols, or images, whether in the form of visual or audio content, or any of such.

However, despite our dedicated efforts to combat illegal activity on TikTok, we recognize that bad actors will attempt to evolve their tactics to evade our safety mechanisms. As detailed below, TikTok takes a holistic approach, including both proactive and reactive measures, to tackle drug promotion and activity on the platform.

Our Community Guidelines, excerpted in part below, state:

We work to ensure TikTok does not enable activities that violate laws or regulations. We prohibit the trade, sale, promotion, and use of certain regulated goods, as well as the promotion or facilitation of criminal activities, including human exploitation. Content may be removed if it relates to activities or goods that are regulated or illegal in the majority of the region or world.

Criminal activities

Criminal activities cover a wide spectrum of acts punishable by law, including theft, assault, human exploitation, counterfeiting, and other harmful behavior. To prevent such behavior from being normalized, imitated, or facilitated, we remove content that promotes or enables criminal activities.

Drugs, controlled substances, alcohol, and tobacco

We do not allow the depiction, promotion, or trade of drugs or other controlled substances. The trade of tobacco and alcohol products is also prohibited on the platform.



Do not post, upload, stream, or share:

- Content that depicts or promotes drugs, drug consumption, or encourages others to make, use, or trade drugs or other controlled substances
- Content that offers the purchase, sale, trade, or solicitation of drugs or other controlled substances, alcohol or tobacco products (including vaping products, smokeless or combustible tobacco products, synthetic nicotine products, E-cigarettes, and other ENDS [Electronic Nicotine Delivery Systems])
- Content that provides information on how to buy illegal or controlled substances
- Content that depicts or promotes the misuse of legal substances, or instruction on how to make homemade substances, in an effort to become intoxicated”

Finally, when it comes to safety, there is no finish line or silver bullet approach. As such, we use a range of tactics to help ensure that our policies are being enforced as effectively as possible. For example, to detect drug-related content:

- We incorporate drug-related emojis and coded language (e.g., slang) in our trainings and provide guidance for our moderators and threat detection and prevention team.
- TikTok’s in-app reporting function can be used to flag direct messages, comments, accounts, and videos that may violate our Community Guidelines, including illegal activity and drug-related content. These cases also go to a human moderator for review and to determine an appropriate action.
- Direct message is a mechanism that can be used on some platforms to sell drugs or promote criminal activities. However, on TikTok, we have special precautions in place. For example, accounts under the age of 16 cannot use our direct message service. We also have a running list of websites that are blocked on the platform, including those that lead to the sale or promotion of drugs.
- As part of our enforcement efforts related to combating illicit drug activity on our platform, we block from search and automatically redirect to our Community Guidelines hashtags such as #percocet, #bennies, #codeine, #420, #buyfentanyl, and #cocaine.



- TikTok does not allow criminal organizations to use our platform, including cartels, as made clear in our Community Guidelines. Once identified, our internal teams work to proactively find other content potentially related to cartels, and detect symbols, slogans, logos, and other indicators associated with those groups that we then remove from the platform.
- [TikTok's Law Enforcement Guidelines](#) provide law enforcement with details on how to submit valid legal requests to TikTok and other useful information specific to our data disclosure practices. These Guidelines also reflect TikTok's commitments to cooperate with law enforcement while respecting our users' privacy in a fair, lawful, and transparent manner. We also have a 24/7 team dedicated to responding to emergency requests from law enforcement.

Second, how, if at all, are you utilizing algorithms and artificial intelligence to identify and prevent drug dealing on your social media services?

TikTok uses a combination of technology and human moderation to detect and remove violating content and accounts, including illegal drug-related content. Our systems work to detect weapons and suspicious accounts, as well as illicit activities on audio and livestreams. Our moderation system also uses advanced technology to identify and flag comments for evidence of solicitation or promotion of criminal activities including the sale, trade, promotion, use, or the depiction of drugs. This work is supported by third parties with expertise in the various issue areas, including LegitScript, an organization dedicated to making internet ecosystems safer and more transparent, and as referenced in our response to Question 4.

Third, how do you work with law enforcement and others to disrupt drug dealing on your social media services?

Our Law Enforcement Response Team routinely discloses relevant user data in response to valid legal requests from law enforcement agencies at all levels. TikTok may share content or account information directly with law enforcement without a request when it believes in good faith that there is an emergency involving imminent harm or risk of death or serious physical injury to a person.

TikTok has a robust law enforcement outreach team that is dedicated to meaningful engagement with law enforcement officers at the federal, state, and local levels. Since May 2021, this team has delivered its outreach training presentation to approximately 6,000 officers across the United States and Canada. The outreach team also regularly hosts information booths and presents at nationwide conferences, such as the recent



annual Dallas Crimes Against Children Conference, which is attended by thousands of law enforcement officials.

Further, TikTok has engaged with the Drug Enforcement Administration (DEA) to raise awareness of the dangers of fentanyl. For example, TikTok has received information and resources from the DEA relating to drug-related emojis, which have subsequently been incorporated into TikTok's moderator training materials. TikTok has also engaged with the DEA on Operation Overdrive, an initiative to actively combat drug-related violence and overdoses. See <https://www.dea.gov/press-releases/2022/02/07/dea-launches-new-initiative-combat-drug-related-violence-and-overdoses-0>.

***Fourth*, how much of your resources do you spend in efforts to combat drug dealing?**

TikTok devotes significant time, personnel, and resources to combat drug-related content on the app. TikTok has a number of dedicated team members on its U.S. Safety team who develop and execute long- and short-term strategies to combat illegal activities on the platform, including drug dealing. As part of that team's efforts, TikTok also has a partnership with an intelligence vendor to identify drug smuggling, human smuggling, and cartel-related content. TikTok also works with LegitScript, an organization dedicated to making internet ecosystems safer and more transparent. LegitScript provides us with intelligence on violative healthcare content (including pharmacy and drug-related content) as well as tobacco and vaping content on TikTok.

Our Illegal Activities and Regulated Goods (IARG) policy team has also made major investments in preventing and removing drug content on TikTok. IARG policy leaders coordinate internal meetings with team members as well as external meetings with our intelligence vendor and outside partners to identify issues, and develop a strategy to swiftly address them. Then, harnessing this internal and external intelligence and expertise, IARG policy leaders partner with the training team to develop refresher trainings and operational guidelines for content moderators.

***Fifth*, how do you promote awareness of the dangers of fake pills laced with fentanyl?**

TikTok has ongoing engagement with a variety of external partners, including non-government organizations and academic researchers, to bolster our efforts to keep illicit content off the platform and to increase awareness about the dangers of fentanyl and other illegal drugs. For example, this year, TikTok [supported National Fentanyl Awareness Day](#) to alert youth to the dangers of fentanyl in fake pills and street drugs. Additionally, through our partnership with [Song for Charlie](#), a nonprofit charity dedicated to raising awareness about 'fentapills' — fake pills made of fentanyl —we are reaching



millions of young people on TikTok with this important, life-saving message. We have built out relationships with other organizations such as Public Goods Project, Campaign for Tobacco Free Children, Talk to Frank, and more. Finally, TikTok will launch a [Safety Center](#) resource page in the coming weeks that will provide the TikTok community with authoritative information on substance use, including information on drugs, tobacco, and alcohol.

We appreciate this opportunity to address these important issues and to provide more information about TikTok and our commitment to removing drug-related content from our platform.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Beckerman".

Michael Beckerman
Vice President and Head of Public Policy, Americas, TikTok