SENT VIA EMAIL AND FIRST-CLASS MAIL

Meta Platforms, Inc.
c/o Ms. Jennifer Newstead
Chief Legal Officer
1 Meta Way
Menlo Park, California 94025

      Re: Weight Loss Advertisements

Dear Ms. Newstead:

      We write regarding the surge of misleading marketing for weight loss products on Meta's platforms. This advertising—much of which is AI-generated—seizes on consumers' insecurities and health concerns, often to boost unapproved and potentially dangerous drugs. Users on Facebook, Instagram, and other Meta platforms are being inundated with promotions that feature misleading claims, obscure risks and side effects, and deceive viewers with AI-generated content. A significant volume of these advertisements violate your own policies on pharmaceuticals, weight loss products, misleading health practices, and manipulated content. We urge Meta to enforce those policies more vigorously and to quickly take further steps to protect consumers from predatory AI-generated weight loss advertisements.

      GLP-1s have exploded in popularity in the last several years. The Food and Drug Administration has approved a number of these drugs as treatments for type 2 diabetes, obesity and related conditions like cardiovascular disease and chronic kidney disease, including Ozempic, Wegovy, Mounjaro, and Zepbound. GLP-1s can have life-changing benefits for patients managing these conditions when used as indicated and with proper medical supervision. But direct to consumer advertising of GLP-1 drugs has skyrocketed[1] and your platforms are no exception:

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[1] LegitScript, *LegitScript's Data Reveals 1200% Increase in Violative and Problematic Advertisements for GLP-1 Medications* (Oct. 2024), https://www.legitscript.com/about/press/glp-1-data-findings/.

Dozens of companies are using your advertising tools to run thousands of ads promoting GLP-1s.[2] Relatively few are offering FDA-approved medications; most are selling unapproved compounded products.

Meta is supposed to place guardrails on pharmaceutical advertisements through company policies. Meta's Prescription Drugs Advertising Policy prohibits the promotion of prescription drugs without Meta's authorization.[3] When authorized, advertisers are supposed to limit promotions to those that "share information around medical efficacy, accessibility and affordability of different types of treatments," avoid targeting minors, and comply with Meta's other policies.[4] Meta's Health and Wellness Advertising Policy, meanwhile, prohibits ads for weight loss products "that imply or attempt to generate negative self-perception or declare there is a perfect body type or appearance one should aspire to."[5] It also bars promotions of weight loss products using side-by-side comparisons, body close ups, "[d]istateful messaging that could make people feel negatively about the way they look," and content fostering "negative or unhealthy body images."[6]

Yet Instagram and Facebook are replete with ads that conflict with these policies. As a recent study found, GLP-1 ads on your platforms commonly "appeal to consumers' emotional motivations for weight loss and self-improvement," exploit societal beauty ideals that may contribute to body dissatisfaction, and "often position weight loss not solely as a health goal but as a means to achieve improved self-confidence, desirability, and social mobility."[7]

This is evident in many ads that, despite your policies, employ side-by-side comparisons and body close-ups. Other ads take advantage of negative body image to promote cosmetic weight loss, even for young women who may not meet the medical criteria for GLP-1 treatment. This often takes the form of promoting weight loss for milestones like weddings, birthdays, holidays, or vacations. For example, a Willow ad proclaims, "Hey girly. It's time to drop 2 pant sizes before summer."[8] Feels and Medvi ads encourage viewers to "get snatched before Christmas with tirzepatide."[9] And a Direct Meds ad encourages viewers to "lose 43 pounds before New Years."[10]

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[2] These include Ageless Rx, Amble, Ark, Cello Health, DirectMeds, Dollar Dad Club, Effecty, Elevate, Fella Health, Freya, Fridays, Gala, Hims, HealthOn, Hers, Henry, Heyfeels, Ivim Health, Kin Meds, MD Exam, Measured Health, Mochi, NativeMed, Noom, NuForm Health, Piper, Queen Rx, Remmy, Rx Pros, Sana Direct, SapphireRX, Shed, Trim Rx, Weight Care, Willow, Zealthy, and Yucca Health.

[3] Meta, *About Meta's Prescription Drugs Advertising Policy*, https://www.facebook.com/business/help/263390265553560?id=434838534925385.

[4] *Id.*

[5] Meta, *About Meta's Health and Wellness Advertising Policy*, https://www.facebook.com/business/help/2489235377779939?id=434838534925385.

[6] *Id.*

[7] J. Rad and G.J. Melendez-Torres, *Critical Discourse Analysis of Social Media Advertisements for GLP-1 Receptor Agonist Weight Loss Drugs: Implications for Public Perceptions and Health Communication*, BMC Public Health (Sept. 1, 2025), https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-025-24197-8.

[8] https://www.facebook.com/ads/library/?id=4000186760292582; https://www.facebook.com/ads/library/?id=851188793704003; *see* Appendix 1.

[9] https://instagram.com/p/DQXKpDpgHfD/; https://instagram.com/p/DQppIyyAHma/; *see* Appendix 2.

[10] https://instagram.com/p/DQUbGyIDbKx/; *see* Appendix 2.

Many ads on your platforms also claim drastic weight loss without adequately disclosing potential risks and side effects. These target the large number of consumers "eager for rapid solutions,"[11] regardless of the risk to their health. In doing so, they run afoul of Meta's prohibition on content that "[p]romotes false or misleading health claims or guarantees in a weight loss context by employing click-bait tactics, such as the use of sensational language that make exaggerated or extreme claims."[12] To give a few examples: a Mochi ad touts an impressive average weight loss of 36-pounds.[13] Another features a spokeswoman claiming her clothes are looser after just two weeks while boasting that she had not eaten all day because she was not hungry.[14] One Medvi ad even guarantees "no side effects . . . just real results."[15] These kinds of ads play up the benefits and minimize the potential downsides, undermining consumers' ability to make fully informed choices about their health care.

AI-generated content is deepening these risks. Advertisers are misleadingly using AI-generated fictitious spokespersons and falsified before-and-after sequences to boost GLP-1s.[16] For instance, one TrimRx ad includes an AI-generated model dramatically losing 208 pounds as an upbeat voiceover boasts "Three weeks you guys, oh my gosh three weeks! This stuff works for real. You need to get on Trim Rx."[17] Other ads feature testimonials from trusted sources—such as law enforcement, nurses, pharmacists, and military personnel—to bolster their claims. The problem: none of these people are real.[18]

The risk is only increasing as AI video generation is rapidly becoming more sophisticated, and therefore harder to detect.[19] The "before" clip in one Direct Meds ad touting the loss of 58 pounds is difficult to identify as AI generated without repeatedly playing the video and scrutinizing its fine details—which consumers are unlikely to do while casually scrolling social media.[20] Meta has acknowledged the importance of informing users that content has been AI-generated and provides an AI-disclosure tool for advertisers,[21] yet many of these ads include no such disclosures.

[11] *See* Nikhil Sood and Rohini Garg, *Global Rise of Compounded Weight Loss Medicines: A Worrisome Trend*, J. Endocrine Society (June 7, 2025), https://academic.oup.com/jes/article/9/8/bvaf084/8158112.

[12] Meta, *Frauds, Scams, and Deceptive Practices* https://transparency.meta.com/policies/community-standards/fraud-and-scams/.

[13] https://www.facebook.com/ads/library/?id=1523320795538989

[14] https://www.facebook.com/ads/library/?id=1293446186133598

[15] https://instagram.com/p/DQU0eWYDEkk/

[16] *See* Appendix 3.

[17] https://www.instagram.com/p/DLBYVsBAApR/, *see* Appendix 3.

[18] *See, e.g.*, https://www.facebook.com/ads/library/?id=847658211179014 (elderly patient); https://www.facebook.com/ads/library/?id=801307826004119 (group of nurses); https://www.facebook.com/ads/library/?id=730809849286915 (pharmacist); https://www.facebook.com/ads/library/?id=1872908603600820 (nurses at nurse station); https://www.facebook.com/ads/library/?id=843982294888184 (CVS pharmacist); https://www.facebook.com/ads/library/?id=1595511314940567 (police officer); *see* Appendix 3.

[19] Mike Isaac and Eli Tan, *OpenAI's New Video App Is Jaw-Dropping (for Better and Worse)*, The New York Times (Oct. 2, 2025), https://www.nytimes.com/2025/10/02/technology/openai-sora-video-app.html.

[20] https://www.facebook.com/ads/library/?id=2500158893689706; *see* Appendix 3.

[21] Nick Clegg, *Labeling AI-Generated Images on Facebook, Instagram, and Threads*, Feb. 6, 2024, https://about.fb.com/news/2024/02/labeling-ai-generated-images-on-facebook-instagram-and-threads/; Meta, *Misinformation*, https://transparency.meta.com/policies/community-standards/misinformation/ (accessed Nov. 6, 2025).

Many ads on your platforms risk misleading consumers regarding compounded GLP-1s. Federal law permitted compounding pharmacies to produce GLP-1 medications in bulk outside of the ordinary drug approval process during a shortage of FDA-approved medications.[22] However, that shortage ended months ago.[23] Now, compounding is only permitted in important, but narrow, circumstances.[24] Regulators, law enforcement, and health organizations alike have cautioned against widespread use of compounded GLP-1s.[25] These drugs are not FDA reviewed for safety, efficacy, and quality.[26] They can have significantly different formulations from approved medications—including active ingredients imported from uninspected foreign facilities, formulation differences, and impurities.[27] These compounded drugs, many in unproven formulations such as liquid solutions, sublingual drops, pills, formulas with added vitamins, and so-called "microdoses," essentially amount to "a mass experiment on unsuspecting patients."[28] Dozens of ads blur these distinctions by suggesting that compounded medications are FDA approved, identical to approved drugs, or even safer and more effective than those drugs. As the FDA recently stated in warnings to numerous compounders and telehealth companies, these kinds of claims are false and misleading in violation of the Federal Food, Drug, and Cosmetic Act.[29]

We appreciate that Meta has adopted certain policies regarding pharmaceutical and weight loss ads. But those policies are being circumvented and are inadequate to address the scope of these issues. We note that the problem is not confined to paid advertising, either: numerous influencers and affiliate marketers are boosting GLP-1 medications without the transparency

[22] *See generally* 21 U.S.C. § 353b.
[23] *See* Food and Drug Administration, *FDA clarifies policies for compounders as national GLP-1 supply begins to stabilize* (Apr. 28, 2025), *available at* https://www.fda.gov/drugs/drug-safety-and-availability/fda-clarifies-policies-compounders-national-glp-1-supply-begins-stabilize.
[24] *See generally* 21 U.S.C. § 353a.
[25] Food and Drug Administration, *FDA's Concerns with Unapproved GLP-1 Drugs Used for Weight Loss* (Sept. 25, 2025), https://www.fda.gov/drugs/postmarket-drug-safety-information-patients-and-providers/fdas-concerns-unapproved-glp-1-drugs-used-weight-loss ["FDA Concerns"]; Federal Bureau of Investigation, *Safety Concerns Related to Fraudulent Compounding Practices Associated with Weight Loss Drugs* (Feb. 28, 2025), https://www.ic3.gov/PSA/2025/PSA250228; Joshua J. Neumiller et al., *Compounded GLP-1 and Dual GIP/GLP-1 Receptor Agonists: A Statement from the American Diabetes Association*, 48 Diabetes Care 177-78 (2025), *available at* https://diabetesjournals.org/care/article/48/2/177/157478/Compounded-GLP-1-and-Dual-GIP-GLP-1-Receptor ["ADA Guidance"].
[26] FDA Concerns, *supra* note 25.
[27] Marta E. Wosińska, *The Wild East of Semaglutide*, Brookings (Apr. 21, 2025), https://www.brookings.edu/articles/the-wild-east-of-semaglutide/; Sood and Garg, *supra* note 11; ADA Guidance, *supra* note 25, at 178; Morten Hach et al., *Impact of Manufacturing Process and Compounding on Properties and Quality of Follow-On GLP-1 Polypeptide Drugs*, 41 Pharmaceutical Research 1991 (2024).
[28] Peter J. Pitts, *FDA Regulatory Failures in Enforcing Limits on GLP-1 Compounding Puts Patients at Risk* 7 (Center for Medicine in the Public Interest July 21, 2025), https://mr.cdn.ignitecdn.com/client_assets/cmpiorg/media/attachments/687e/a93b/8bf7/5526/a476/a1e5/687ea93b8bf75526a476a1e5.pdf?1753131323; *see also* Shiv Sudhakar, *Ozempic 'Microdosing' is the New Weight-Loss Trend: Should You Try It?*, Fox News (Jan. 5, 2025), https://www.foxnews.com/health/ozempic-microdosing-new-weight-loss-trend-should-you-try-it?
[29] Matthew Perrone, *FDA Takes Aim at Telehealth Companies for Promoting Unofficial Weight Loss Drug Dupes*, PBS (Sept. 17, 2025), https://www.pbs.org/newshour/health/fda-takes-aim-at-telehealth-companies-for-promoting-unofficial-weight-loss-drug-dupes.

required by federal regulations and your policies.[30] Troublingly, emerging evidence indicates that social media marketing is shaping consumers' views about and interest in GLP-1s.[31] We urge Meta—at a minimum—to enforce its existing policies more vigorously. We also ask Meta to take additional steps to protect the public, including:

- Restricting the advertisement of prescription pharmaceuticals in the United States to those that are FDA approved;
- Requiring content promoting weight loss products to clearly and conspicuously disclose the risks and potential side effects;
- Prohibiting the promotion of weight loss drugs using AI-generated content such as spokespeople, testimonials, and before and after images;
- Employing more prominent AI-generated content labeling and developing better tools to detect and remove content not properly labeled;
- Implementing safeguards for users who search on your platforms for weight loss products and GLP-1s, such as redirecting users to authoritative safety and educational resources when they search for weight loss products or GLP-1s;
- Ensuring that recommendation algorithms used to serve content and advertisements on your platforms do not trap users in filter bubbles of weight loss promotions.

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Connecticut Attorney General

Jeff Jackson
North Carolina Attorney General

Dave Yost
Ohio Attorney General

Dave Sunday
Pennsylvania Attorney General

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[30] *See* 16 C.F.R. § 255.5 ("Disclosure of material connections"); Federal Trade Commission, Disclosures 101 for Social Media Influencers (Nov. 2019), https://www.ftc.gov/system/files/documents/plain-language/1001a-influencer-guide-508_1.pdf; Meta, Branded Content Policies (last accessed Nov. 6, 2025), https://www.facebook.com/business/help/221149188908254; Alex Kresovich *et al.*, *Research Letter: High-Engagement Social Media Posts Related to Prescription Drug Promotion for 3 Major Drug Classes*, JAMA Online (Nov. 13, 2025), https://jamanetwork.com/journals/jama/article-abstract/2841349.
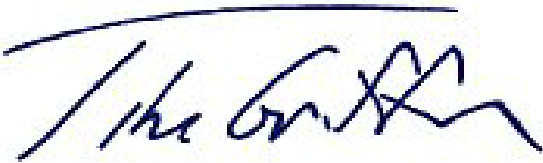
[31] National Consumers League, *The Influence of Disinformation on Attitudes and Beliefs About Compounded GLP-1 Drugs: A Dose of Reality* (May 2025), https://nclnet.org/wp-content/uploads/2025/05/The-Influence-of-Disinformation-on-Attitudes-and-Beliefs-About-Compounded-GLP-1-Drugs-Survey-Results.pdf.

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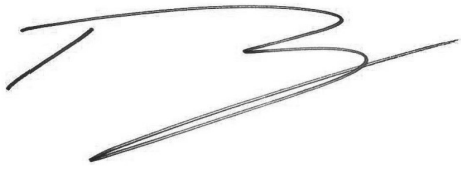
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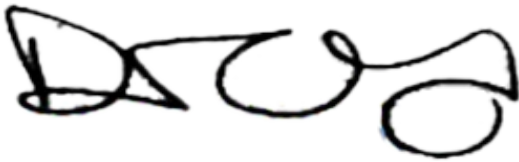
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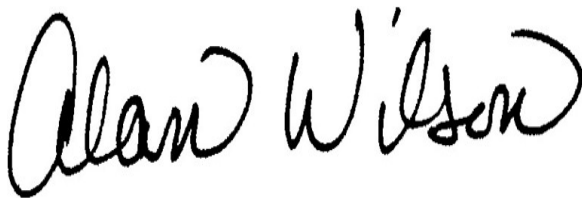
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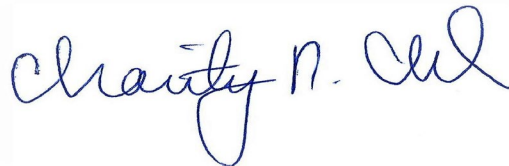
Alan Wilson
South Carolina Attorney General
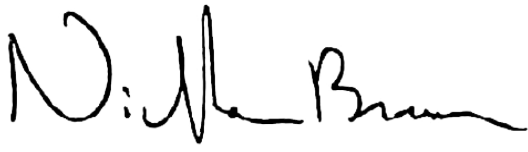
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South Dakota Attorney General

Derek Brown
Utah Attorney General

Charity Clark
Vermont Attorney General

Nick Brown
Washington Attorney General

Appendix
GLP-1 Promotions on Meta Platforms

1. Willow Health advertisements targeting young women:

Willow Health
Sponsored
Library ID: 4000186760292582

Are you being held captive by your weight? Set yourself free with personalized, physician-prescribed treatments.

Willow provides personalized weight loss medication and healthcare that works with your unique body, biology, lifestyle, and goals. We believe that healthcare should be personal, and tailor your medication, program, and support all around you and your unique situation.

✔ Naturally reduces appetite for a more manageable approach to dieting.
✔Curbs cravings making your weight loss journey smoother.
✔Enhances healthy lifestyle habits.

Go with Willow, and feel like you again.
1. Free visits and follow-ups with a board-certified physician
2. Customized treatment plans
3. Convenient, free delivery

Lose up to 20% of your body weight safely and sustainably.

Get started with Willow for free today!

Hey girly. It's time to drop 2 pant sizes before summer

Start Your Free Visit Today!   Learn More

Willow Health
Sponsored
Library ID: 851188793704003

Are you being held captive by your weight? Set yourself free with personalized, physician-prescribed treatments.

Willow provides personalized weight loss medication and healthcare that works with your unique body, biology, lifestyle, and goals. We believe that healthcare should be personal, and tailor your medication, program, and support all around you and your unique situation.

✔ Naturally reduces appetite for a more manageable approach to dieting.
✔Curbs cravings making your weight loss journey smoother.
✔Enhances healthy lifestyle habits.

Go with Willow, and feel like you again.
1. Free visits and follow-ups with a board-certified physician
2. Customized treatment plans
3. Free delivery directly to your door

Lose up to 20% of your body weight safely and sustainably.

Get started with Willow for free today!

steph.turner96 1d
Tried every workout and diet under the sun 😫 for YEARS with zero results 😩. Asked my doc about Ozempic: DENIED 😒.
Willow came through with the compounded stuff, and 3 months later? I'm looking 🔥 and feeling amazing.
If those last 20 lbs feel impossible like they were for me, it's your biology, seriously this stuff changed my life 🙏✨

♡ 1.2K   ⚪ 74   ⟳ 8   ∀ 8

STARTWILLOW.COM
Start Your Free Visit Today!   Shop now
GLP-1 weight loss medication, completely personalized for you by board-certified doctors....

Willow Health
Sponsored
Library ID: 4000186760292582

Are you being held captive by your weight? Set yourself free with personalized, physician-prescribed treatments.

Willow provides personalized weight loss medication and healthcare that works with your unique body, biology, lifestyle, and goals. We believe that healthcare should be personal, and tailor your medication, program, and support all around you and your unique ...

PSA for the girls: you don't need to be obese to start a GLP-1

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2. Direct Meds, Feels, and Medvi ads encouraging viewers to lose weight for the holidays:

3. AI-Generated Content:

Trim Rx AI-generated advertisement
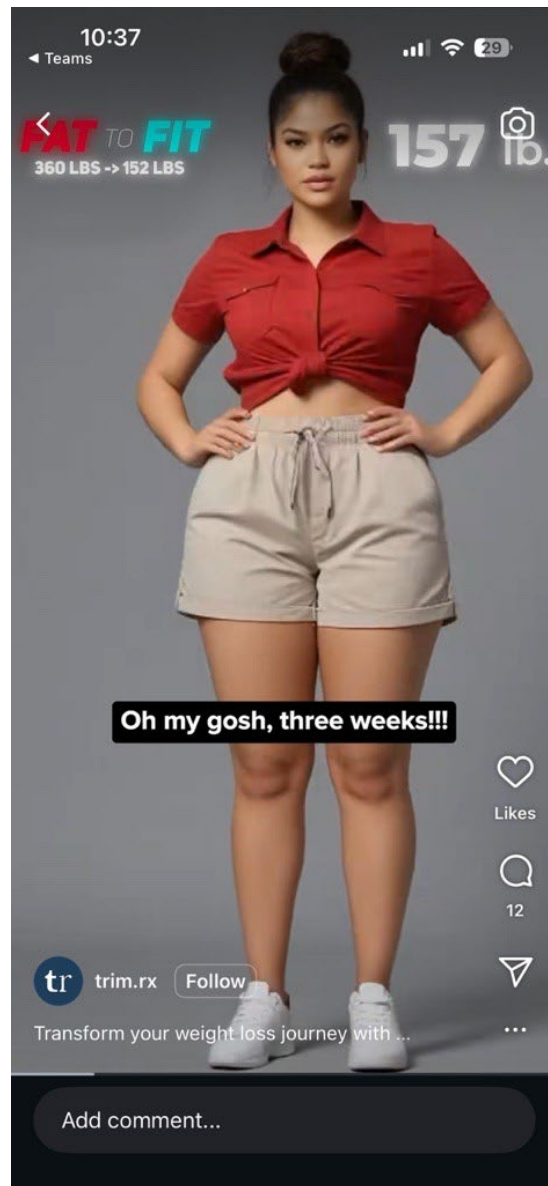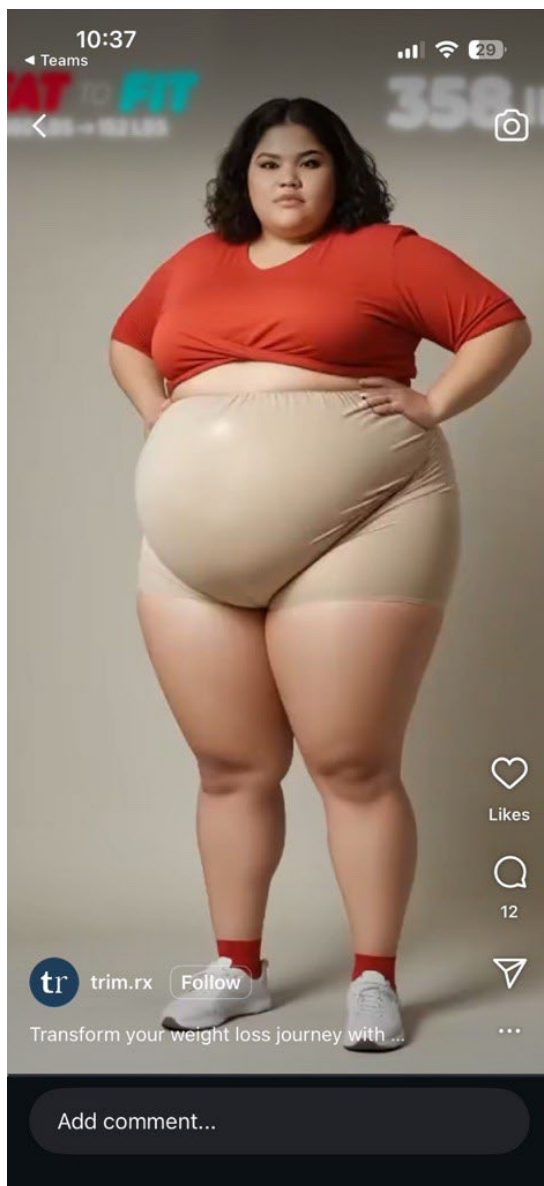
Direct Meds AI-generated "before" clip

Shot #1
193lbs

Shot #17
135lbs

I Got My GLP-1 For
Only $147/ Month ($5 a day)
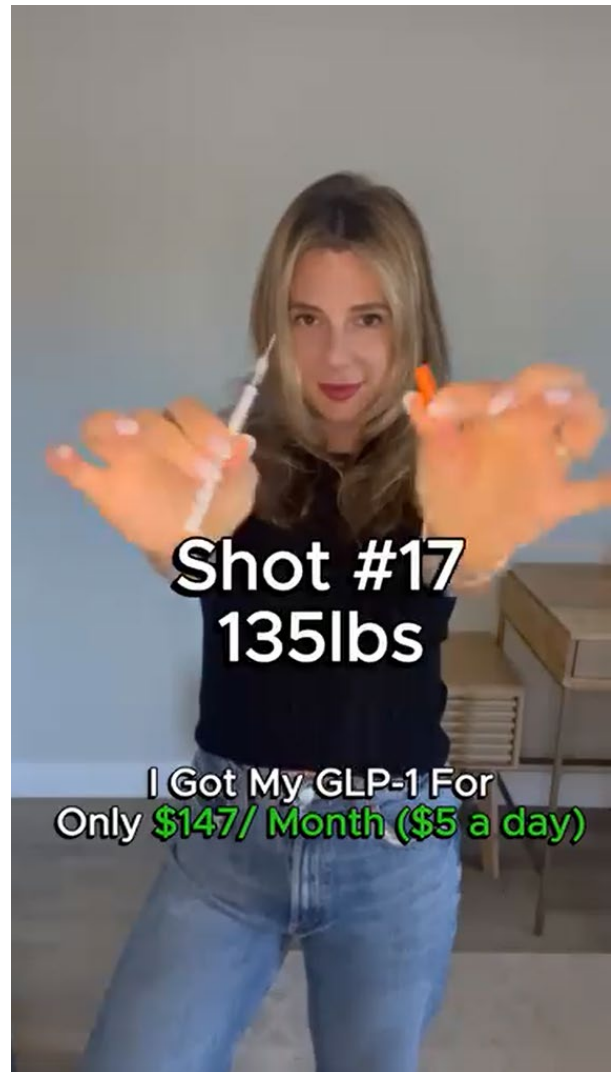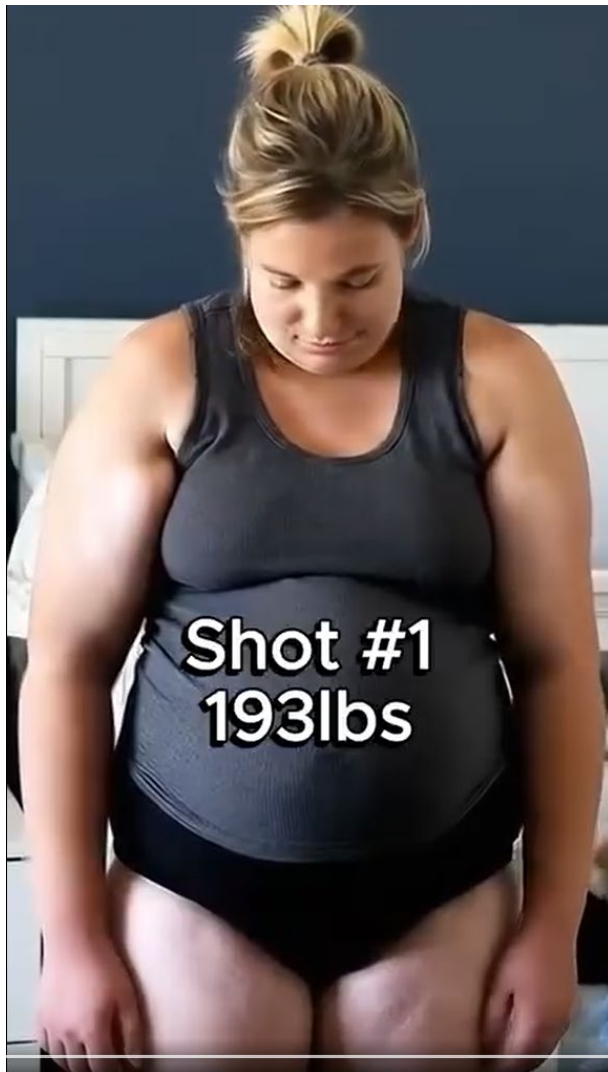
AI-Generated Before and After Sequences and Spokespeople