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10
11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 MARY DOE, as next friend of minor
14 plaintiff, JANE DOE,

15 Plaintiff,

16 v.

17 ROBLOX CORPORATION; DISCORD
18 INC.,

19 Defendants.

Case No.: 3:25-cv-8350

COMPLAINT FOR DAMAGES

- (1) Fraudulent Concealment and Misrepresentation
- (2) Negligent Misrepresentation
- (3) Negligence – General
- (4) Negligence – Failure to Warn
- (5) Negligence – Unreasonable Design
- (6) Negligent Undertaking
- (7) Strict Liability – Design Defect
- (8) Strict Liability – Failure to Warn

JURY TRIAL DEMANDED

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1 Plaintiff Jane Doe (“Plaintiff”) brings this action against Roblox Corporation (“Roblox”) and
2 Discord Inc. (“Discord”) (collectively, “Defendants”) to recover damages arising from the severe
3 injuries she suffered because of Defendants’ respective conduct in creating, designing, marketing,
4 and distributing their mobile- and web-based applications (“apps”), and alleges as follows:

5 **I. INTRODUCTION**

6 1. This action seeks to hold Defendants Roblox and Discord accountable for
7 facilitating the sexual exploitation of Plaintiff. The heinous acts against Plaintiff were committed
8 by dangerous child predators whose actions were possible only because of the egregiously tortious
9 conduct of Defendants.

10 2. With their pervasive misrepresentations about safety, Defendants lure parents into
11 believing their apps are appropriate places for children to play. In reality, and as Defendants well
12 know, the design of their apps makes children easy prey for pedophiles. They allow adult users to
13 identify and readily initiate conversations with children, then manipulate the trust of those children.
14 Roblox allows adult users to easily identify and groom children and then move their
15 communications to Discord—an app that permits a child to chat with anyone over voice, video,
16 and text messaging. On Discord, these pedophiles are able to coerce the children into sending
17 sexually explicit images or meeting in person. There are steps Roblox and Discord could take to
18 protect children and make their apps safer. But time and again they have refused to invest in basic
19 safety features to protect against exactly the kind of exploitation Plaintiff suffered here.

20 3. The reason for Roblox’s unlawful conduct is simple: Roblox prioritizes user growth
21 over child safety. As one former Roblox employee explained in describing the company’s approach
22 to child safety, “You have to make a decision, right? You can keep your players safe, but then it
23 would be less of them on the platform. Or you just let them do what they want to do. And then the
24 numbers all look good and investors will be happy.”¹ Discord has taken the same approach to child
25

26
27 ¹ *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, Hindenburg
28 Research (Oct. 8, 2024), <https://hindenburesearch.com/roblox/>.

1 safety on its app. Defendants' prioritization of growth over the safety of children has devastated
2 the lives of children who use their apps.

3 4. Plaintiff was an avid user of Roblox and Discord. Plaintiff's mother allowed
4 Plaintiff to use Roblox only because she trusted Roblox's representations that its app was safe for
5 children to use. Plaintiff's family learned the truth only after it was too late. Plaintiff's mother
6 discovered that Roblox and Discord had enabled a child predator to identify, groom, and coerce
7 Plaintiff, a minor, into sending sexually explicit images and videos of herself, including those of
8 Plaintiff masturbating. Several predators also sent Plaintiff videos of themselves masturbating.

9 5. Plaintiff suffered this sexual exploitation and abuse as the direct result of
10 Defendants' conduct. For years, Roblox has misrepresented and deliberately concealed information
11 about the pervasive predatory conduct that its app enables and facilitates. Had Roblox disclosed
12 the truth of what was really occurring on its app, Plaintiff's parents would never have permitted
13 Plaintiff to use the app. Had Defendants taken any steps to screen users before allowing them on
14 the apps, Plaintiff would not have been exposed to the large number of predators trolling the
15 platforms. Had Defendants implemented even the most basic system of age and identity
16 verification, as well as other commonsense safety measures, Plaintiff would never have engaged
17 with these predators and never been harmed.

18 6. Plaintiff has suffered unimaginable harm. Her innocence has been snatched from
19 her forever. Tragically, what happened to her is far from an isolated event. Indeed, Plaintiff is just
20 one of countless children whose lives have been devastated as a result of Defendants' gross
21 negligence and defectively designed apps. This action, therefore, is not just a battle to vindicate
22 Plaintiff's rights—it is a stand against Defendants' systemic failures to protect society's most
23 vulnerable from unthinkable harm in pursuit of financial gain over child safety.

24 **II. PARTIES**

25 **A. Plaintiff**

26 7. Plaintiff Jane Doe is a citizen and resident of the State of Florida, with a principal
27 place of residence in Brevard County.

1 8. Plaintiff has suffered profound and enduring harm. This includes significant
2 emotional distress, psychological trauma, suicidal ideations, attempted suicide, and mental
3 anguish. Plaintiff's experiences have led to a loss of trust, safety, and personal security, depriving
4 her of the opportunity for a normal and healthy development. The injuries she sustained are severe,
5 ongoing, and permanent, affecting her daily life and emotional health in lasting and immeasurable
6 ways.

7 9. Plaintiff never entered any contract with Defendants. To the extent Defendants
8 claim that Plaintiff attempted to accept an electronic terms and conditions clause by clicking
9 buttons on a screen that included language that Plaintiff did not read or understand, such an
10 assertion is legally erroneous, invalid, and unenforceable, including because Plaintiff disaffirms
11 any contract that she may have entered, including any forced arbitration agreement and any
12 delegation clause in any contract; Plaintiff lacked the capacity to enter any contract, including any
13 forced arbitration agreement and any delegation clause in any contract; and any arbitration
14 agreement is invalid and unenforceable under the Ending Forced Arbitration of Sexual Assault and
15 Sexual Harassment Act, Pub. L. No. 117-90, codified at 9 U.S.C. §§ 401-402.

16 **B. Defendants**

17 10. Defendant Roblox Corporation is a Nevada corporation with its principal place of
18 business in San Mateo, California. Roblox owns, operates, controls, produces, designs, maintains,
19 manages, develops, tests, labels, markets, advertises, promotes, supplies, and distributes the
20 Roblox app. Roblox is widely available to consumers throughout the United States.

21 11. Defendant Discord Inc. is a Delaware corporation with its principal place of
22 business in San Francisco, California. Discord owns, operates, controls, produces, designs,
23 maintains, manages, develops, tests, labels, markets, advertises, promotes, supplies, and
24 distributes the Discord app. Discord is widely available to consumers throughout the United
25 States.

1 **III. JURISDICTION AND VENUE**

2 12. This Court has subject-matter jurisdiction over this action under 28 U.S.C. § 1332(a)
3 because Plaintiff and Defendants are citizens of different states and the amount in controversy
4 exceeds \$75,000.

5 13. This Court has personal jurisdiction over Defendants because they maintain their
6 principal places of business within this District.

7 14. Venue is proper here under 28 U.S.C. § 1391(b) because (1) both Defendants are
8 residents of California and reside in this District and (2) a substantial part of the events or omissions
9 giving rise to the claims occurred in this District.

10 **IV. FACTUAL ALLEGATIONS AS TO ROBLOX**

11 **A. Roblox Offers a Gaming App for Children.**

12 15. Launched in 2006, Roblox is an online gaming app that allows users to play myriad
13 games, which the company refers to as “experiences.” There are currently more than 40 million
14 experiences within the Roblox ecosystem. Most experiences on Roblox are created not by Roblox
15 but by individuals (often Roblox users) or companies that develop their own games and make them
16 available on Roblox for others to play.

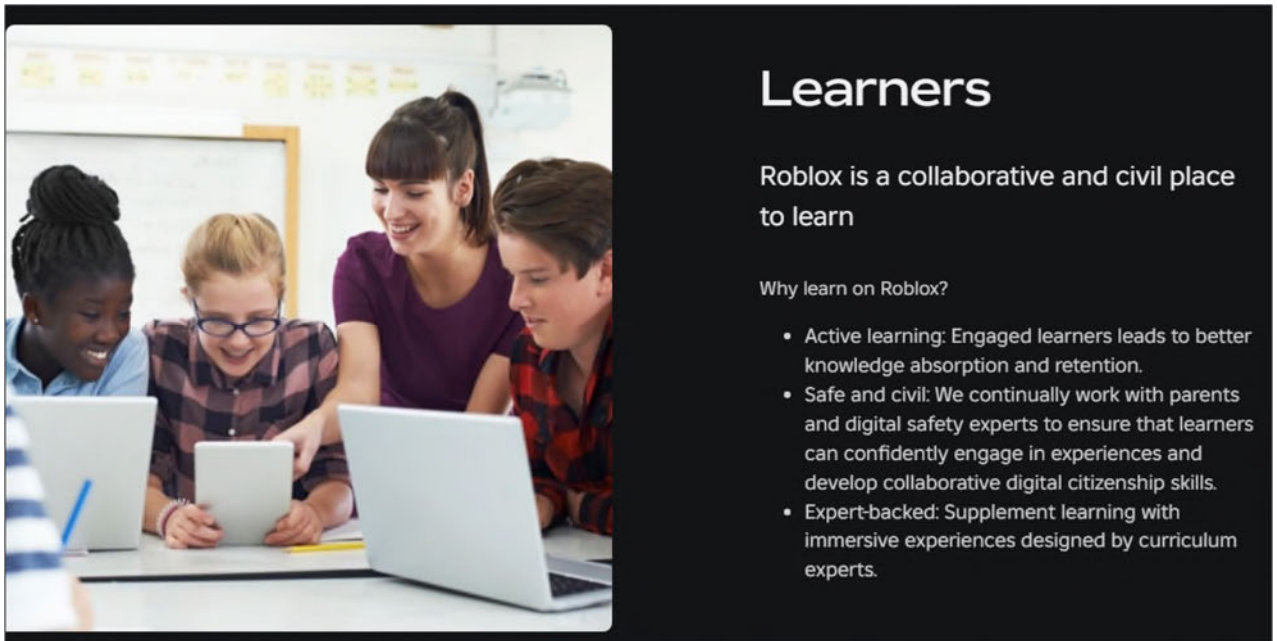
17 16. Roblox is easily accessible, including to children. It is free to download and play and
18 is available on gaming consoles, computers, tablets, and cellular devices.

19 17. Roblox is designed to be an interactive experience, allowing and encouraging users
20 to communicate with each other. Gameplay interactions, user hubs, direct messaging, and voice chat
21 all promote social interactions between users. Roblox’s co-founder and CEO David Baszucki has
22 explained that his vision is for Roblox to bring about “the next phase of human interaction,” which
23 he also has described as “a new category of human coexperience.”² Roblox has similarly explained
24 that it “operates a human co-experience platform . . . where users interact with each other to explore
25

26
27 ² David Baszucki, Co-founder and CEO of Roblox, *The CEO of Roblox on Scaling Community-*
28 *Sourced Innovation*, Har. Bus. Rev., The Magazine, (Mar-Apr 2022), <https://hbr.org/2022/03/the-ceo-of-roblox-on-scaling-community-sourced-innovation>.

1 and develop immersive, user-generated, 3D experiences.”³

2 18. Roblox designed its app for children. Roblox has marketed its app not only as the
3 “#1 gaming site for kids and teens”⁴ but also as an educational experience for young users. Roblox
4 claims that it provides “new gateways into learning”—from “chemistry to physics to robotics and
5 more, Roblox experiences bring concepts to life in ways that immerse learners and motivate
6 exploration, play, and deep thinking.”⁵ These offerings, according to Roblox, include “high-quality,
7 standards-aligned, immersive educational experiences designed by curriculum experts.”⁶



18 *Roblox webpage – “A New Era of Engaged Learning”*

19 19. Roblox’s popularity among children exploded during the pandemic when the app
20 was flooded with millions of new users as kids were confined to their homes and glued to their
21 devices. By September 2020, roughly 30 million people, more than half of them under 13, were on
22 Roblox daily, making it the world’s biggest recreational zone for kids.

23 20. That growth has continued unabated. In Roblox’s 2023 Annual Report, the company

24

25 ³ Roblox Corp., Quarterly Report (Form 10-Q) (Mar. 13, 2021).

26 ⁴ Roblox, *What Is Roblox*, <http://web.archive.org/web/20170227121323/https://www.roblox.com/>
(archived Feb. 27, 2017).

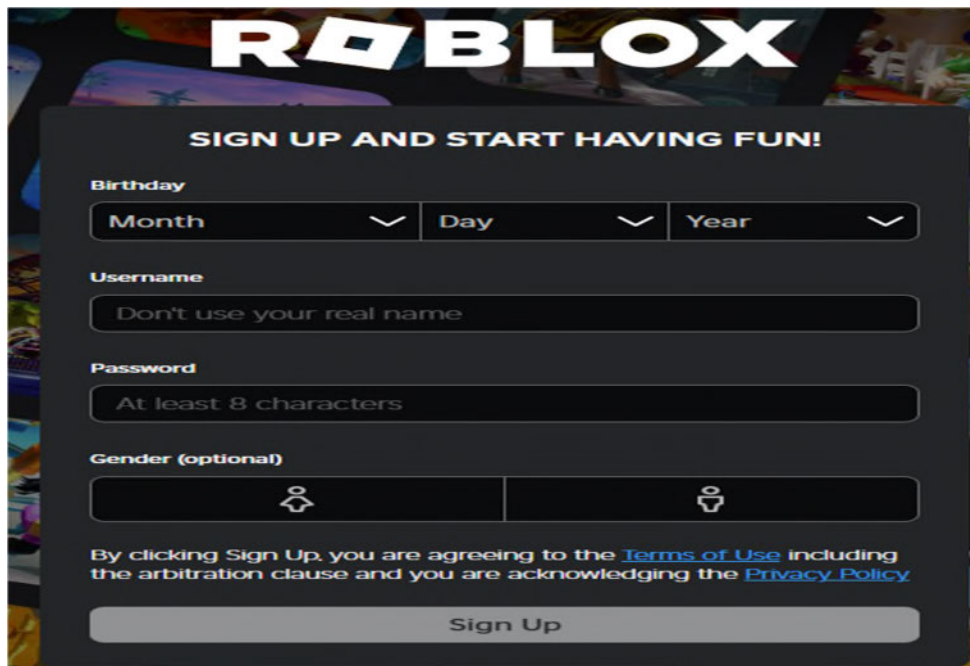
27 ⁵ Roblox, *A New Era of Engaged Learning*, <https://corp.roblox.com/education> (last visited Feb.
28 11, 2025).

⁶ *Id.*

1 reported an average of 68.5 million daily active users, with 21% under 9 years of age; 21% from 9-
2 12 years of age; 16% from 13-16 years of age; and 41% over 17 years of age.

3 21. Today, Roblox is the most downloaded online game globally, and the average user
4 spends 139 minutes a day on the app.⁷

5 22. Individuals who wish to play Roblox must create an account. It is extremely easy to
6 “SIGN UP AND START HAVING FUN!” Users must provide only a birthdate, username, and
7 password. Users of any age can create an account. There is no age minimum. Roblox does not
8 require users to verify their age upon sign-up, so they can easily represent that they are younger or
9 older than their actual age.



The image shows the Roblox sign-up screen. At the top, the Roblox logo is displayed in white on a dark background. Below the logo, the text "SIGN UP AND START HAVING FUN!" is written in white. The form consists of several fields: "Birthday" with three dropdown menus for "Month", "Day", and "Year"; "Username" with a text input field containing the placeholder "Don't use your real name"; "Password" with a text input field containing the placeholder "At least 8 characters"; and "Gender (optional)" with two radio button options represented by male and female icons. At the bottom, there is a line of text stating: "By clicking Sign Up, you are agreeing to the [Terms of Use](#) including the arbitration clause and you are acknowledging the [Privacy Policy](#)". Below this text is a large, light gray "Sign Up" button.

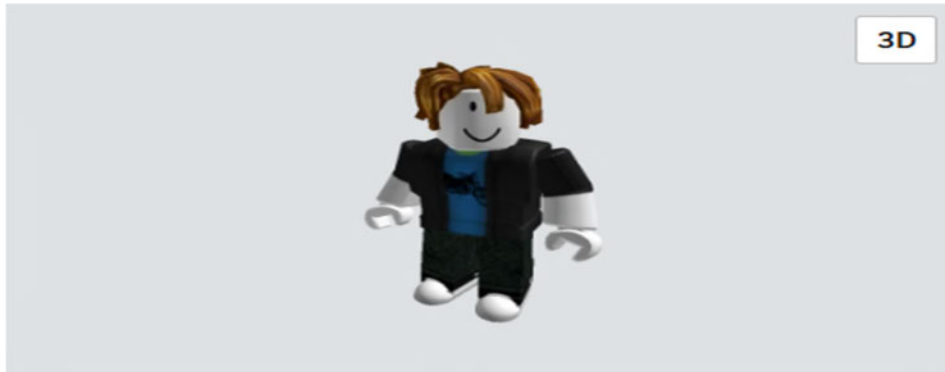
21 *Roblox Sign-up Screen*

22 23. Although Roblox states that children must have parental permission before signing
23 up for an account, nothing prevents them from creating their own accounts and playing on Roblox.
24 Roblox does nothing to confirm or document that parental permission has been given, no matter
25 how young a child is. Nor does Roblox require a parent to confirm the age given when a child signs
26 up to use Roblox.

27
28 ⁷ Qustodio, *Research by App Category – Gaming*, <https://www.qustodio.com/en/the-digital-dilemma/gaming/> (last visited Feb. 11, 2025).

1 24. Roblox has access to biometric age and identity verification software that requires
2 the user to take a photo of a government-issued ID along with a real-time “selfie” that is then verified
3 through artificial intelligence. While Roblox utilizes this software for certain purposes, it
4 intentionally or recklessly does not use this feature when new accounts are created. Instead, Roblox
5 continues to rely on self-reported birthdates for age verification, and its app is intentionally or
6 recklessly designed to allow users to create accounts using fake birthdates, allowing adults to pose
7 as children and children to easily circumvent the more restrictive controls for users under 13.

8 25. After creating an account, all users are assigned a default player avatar—a
9 cartoonish character that represents the individual user within certain games.



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16 *Example default avatar on Roblox.*

17 26. They can then play in millions of experiences on the app. These games are sorted
18 into different genres/categories, such as Sports, Role-Playing Games, Fighting, First Person
19 Shooters, Fashion, Horror, Comedy, Military, and Naval. The games recommended to a user will
20 vary based on the age the user entered when generating their account and Roblox’s algorithm that
21 recommends games to the user.



Examples of games available on Roblox.

27. Until November 2024, Roblox configured its app to default to settings that allowed adults to easily communicate with children. Adult strangers could “friend” and chat with a child of any age via direct (*i.e.*, private) message. Further, even without being “friends,” adults could also chat with a child of any age within a Roblox experience through direct messages.

28. Now, under Roblox’s default settings, adults cannot directly message children under 13, but Roblox still does nothing to prevent children this young from creating accounts with fake 13+ birthdates, which gives them full access to Roblox’s direct-messaging options. Roblox still relies on self-reported birthdates for age verification. Further, children 13 and over are still vulnerable to receiving friend requests—or direct messages within Roblox experiences—from adult strangers. There is also nothing that prohibits adults from entering fake birthdays and posing as children in their attempts to friend or otherwise communicate with children users.

29. Roblox generates revenue largely by selling users an in-game digital currency called Robux, which they exchange for digital content such as online experiences and customized outfits and appearances for their avatars. Robux can be purchased in a single transaction or a user may subscribe to receive Robux on a recurring basis with a Roblox Premium membership. Roblox also offers Robux gift cards that anyone can purchase and send to any user.

30. Children frequently become obsessed with purchasing or otherwise obtaining Robux to buy items for their avatars and to spend in their favorite experiences on Roblox. In Roblox’s Avatar Store, for example, the company sells rare items at astronomical prices, such as a type of

1 hair for an avatar, which children seek to purchase to keep up with or outdo their peers on Roblox.
 2 As a result, children often tell others, including strangers, that they will do “Anything for Robux.”⁸

3 **B. Roblox Lures Parents into Letting Their Kids Use Roblox with Promises of**
 4 **Safety.**

5 31. Roblox’s success and continued growth have hinged on its constant, false assurances
 6 to parents that its app is safe for children. The company has offered such assurances throughout its
 7 history and in every forum possible—on its website, through public promises of its highest
 8 executives, in news articles, on podcasts, and on and on.

9 32. Over the years, Roblox has repeatedly represented on its website that its app is safe
 10 for children and has touted the safety controls it has in place. As early as 2007, Roblox’s website
 11 assured parents that Roblox is an “online virtual playground . . . where kids of all ages can safely
 12 interact, create, have fun, and learn.”⁹

13 33. From 2008 to 2016, the website continued to promise parents, “We take every
 14 precaution possible to make sure kids are protected from inappropriate and offensive individuals as
 15 well as from indecent and distasteful content.”¹⁰ It also assured parents that Roblox had a zero-
 16 tolerance policy for “swearing and obscenities, messages and content of a sexual or violent nature,
 17 and any sort of aggressive or threatening communication,” and “immediately suspended or
 18 permanently expelled” any offenders.¹¹

19 34. The website has consistently sought to paint Roblox as “family friendly” and safe for
 20 children of all ages. In 2017, Roblox began declaring that it “take[s] kids’ safety and privacy very
 21

22 ⁸ Olivia Carville & Cecilia D’Anastasio, *Roblox’s Pedophile Problem*, Bloomberg Businessweek
 23 (July 23, 2024), <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/>.

24 ⁹ Roblox, *Frequently Asked Questions (FAQs)*,
 25 <https://web.archive.org/web/20071105104643/http://www.roblox.com/Parents/FAQs.aspx>
 (archived Nov. 5, 2007).

26 ¹⁰ Roblox, *Keeping Kids Safe*,
 27 [https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.a](https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx)
 spx (archived May 1, 2008); *see also* Roblox, *Information for Parents*,
 28 <https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents> (archived Jan. 31,
 2016).

¹¹ *Id.*

seriously” and “strive[s] to continually develop new and innovative technologies that will protect the safety of our community while allowing players to imagine, create, and play together in a family-friendly environment.”¹² Roblox similarly has advertised its app as “a safe, moderated place to meet, play, chat, and collaborate on creative projects.”¹³

As the largest growing social platform for play, Roblox gives players a safe, moderated place to meet, play, chat, and collaborate on creative projects. If so inclined, they can even go on to learn how to build and code immersive experiences for others, all at their own pace.



Excerpt from Roblox Parent’s Guide in 2017

35. Roblox’s website representations have remained largely unchanged since then. In 2023, for example, Roblox assured parents that it “continually develop[s] cutting-edge technologies to ensure that the Roblox platform remains a safe and fun space for players all over the world.”¹⁴ Roblox claimed that the company was “dedicated to working together with parents and digital safety experts to promote a family-friendly environment that allows all players to imagine, create, and play online.”¹⁵ Roblox emphasized that it is “committed to ensuring that Roblox is a safe and fun place

¹² Roblox, *Parents’ Guide*, <https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/> (archived Jul. 16, 2017).

¹³ *Id.*

¹⁴ Roblox, *For Parents*, <https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/> (archived Apr. 5, 2023).

¹⁵ *Id.*

1 for everyone.”¹⁶ According to Roblox, it “goes above and beyond to foster an environment where
 2 people of any age can create, play, learn, and imagine safely. We’ve kept children’s privacy and
 3 safety top-of-mind when designing our platform, especially through the implementation of advanced
 4 text filters that block inappropriate language or other unsafe content.”¹⁷

5 36. Roblox’s website today contains similar assurances. It claims, “Safety is in our DNA:
 6 when Dave Baszucki and Erik Cassel launched Roblox in 2006, they spent a few hours each day
 7 with the community, helping to ensure that Roblox was a safe and welcoming environment. Safety
 8 was their top priority, and they made constant improvements in their moderation, both for content
 9 and for communication on the platform.”¹⁸

10 37. According to the current website, Roblox “won’t allow language that is used to
 11 harass, discriminate, incite violence, threaten others, or used in a sexual context.”¹⁹ It touts a
 12 “stringent safety system and policies,”²⁰ which includes its “expertly trained team with thousands
 13 of members dedicated to protecting our users and monitoring for inappropriate content”; its “safety
 14 review of every uploaded image, audio, and video file, using a combination of review by a large
 15 team of human moderators and machine detection before they become available on our platform”;
 16 and its chat filters for inappropriate content, which “are even stricter” for children under 13 and
 17 “include any potentially identifiable personal information, slang etc.”²¹

18 38. These false promises and assurances are not confined to Roblox’s website. They are
 19

20
 21 ¹⁶ Roblox, *Roblox FAQ*,
 22 <https://web.archive.org/web/20230328011957/https://corporate.roblox.com/faq/> (archived Mar.
 28, 2023).

23 ¹⁷ Roblox, *Roblox & User Data FAQ*, [https://en.help.roblox.com/hc/en-](https://en.help.roblox.com/hc/en-us/articles/4406238486676-Roblox-User-Data-FAQ)
 24 [us/articles/4406238486676-Roblox-User-Data-FAQ](https://en.help.roblox.com/hc/en-us/articles/4406238486676-Roblox-User-Data-FAQ) (last visited Feb. 11, 2025).

25 ¹⁸ Roblox, *Safety Comes First on Roblox*, [https://corp.roblox.com/safety-civility-](https://corp.roblox.com/safety-civility-resources?section=news&article=safety-comes-first-on-roblox)
 26 [resources?section=news&article=safety-comes-first-on-roblox](https://corp.roblox.com/safety-civility-resources?section=news&article=safety-comes-first-on-roblox) (last visited Feb. 11, 2025).

27 ¹⁹ Roblox, *Safety Features: Chat, Privacy & Filtering*, [https://en.help.roblox.com/hc/en-](https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200tha)
 28 [us/articles/203313120-Safety-Features-Chat-Privacy-](https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200tha)
 Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200tha
 n%20younger%20players (last visited Feb. 11, 2025).

²⁰ Roblox, *Safety & Civility at Roblox*, [https://en.help.roblox.com/hc/en-](https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox)
 28 [us/articles/4407444339348-Safety-Civility-at-Roblox](https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox) (last visited Feb. 11, 2025).

²¹ *Id.*

1 repeated in statements by the company's highest executives—including in direct response to
2 concerns raised by parents.

3 39. In 2009, a blogger wrote about blocking Roblox because he doubted its safety for his
4 children. CEO David Baszucki responded to the blogger reassuring him that Roblox flags
5 "obviously offensive content" and removes it, and if "something is marginal, but gets flagged as
6 inappropriate," Roblox "investigate[s] immediately."²²

7 40. In a 2013 *Wired* interview, when asked whether a parent should be concerned about
8 whom his child was chatting with in-game, Baszucki declared, "We take every precaution possible
9 to make sure kids are protected from inappropriate and offensive individuals as well as from
10 indecent and distasteful content," taking a sentence verbatim from Roblox's webpage for parents.²³

11 41. Tami Bhaumik, Roblox's current Vice President of Civility & Partnerships, has
12 doubled down on these promises in statements to parenting magazines, news outlets, and podcasts—
13 all aimed at persuading parents to let their children use Roblox. She also has contacted international
14 online safety experts in an effort to sell Roblox's safety story.

15 42. As recently as 2024, Bhaumik told *Parents Magazine* that "[w]e have a responsibility
16 to make sure our players can learn, create, and play safely. This continues to be our most important
17 priority and that will never change."²⁴

Parents

In response to safety concerns, Roblox notes that the platform was designed for kids and teens from the beginning, and they're committed to making safety a priority. "We have a responsibility to make sure our players can learn, create, and play safely," notes Tami Bhaumik, Vice President of Civility & Partnerships at Roblox. "This continues to be our most important priority and that will never change."

²² Eric Frenchman, *Revisiting Roblox*, Pardon My French (Oct. 5, 2009),

<https://pardonmyfrench.typepad.com/pardonmyfrench/2009/10/revisiting-roblox.html>.

²³ Tony Sims, *Interview with David Baszucki, Founder & CEO of Roblox*, *Wired* (Feb. 7, 2013),
<https://www.wired.com/2013/02/roblox/>.

²⁴ Maressa Brown, *Is Roblox Safe for Kids? Here's What the Experts Have to Say*, *Parents Magazine* (Apr. 29, 2024), <https://www.parents.com/kids/safety/internet/is-roblox-safe-for-kids/>.

43. Such statements by Bhaumik date back years. In 2018, Bhaumik told the *Washington Post* that Roblox “focus[es] on making sure that everything is done in a safe and appropriate way.”²⁵ That year, she also claimed to another newspaper that Roblox’s “safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate.”²⁶ She also boasted that Roblox has “created extensive parental controls for our games and a detailed Roblox Parent’s Guide that provides information to parents to help create a Roblox experience that’s best for their child.”²⁷

44. In 2019, while presenting on a “Digital Civility Panel,” Bhaumik emphasized that “[w]e make sure there’s a safe environment,” citing Roblox’s “tremendous reporting system” and “incredible moderation and CS team that reacts very, very quickly.”²⁸ On that same panel—and in contradiction to Roblox’s representation that it had always taken “every precaution possible” to protect children, Bhaumik conceded that “digital civility did not exist at Roblox a year and a half ago and we established this and made it a movement within our company.”²⁹ She added later, “It’s still very early days for us. This whole digital civility focus for Roblox is still there, we’re just still establishing it.”³⁰

45. In a 2022 video interview about safety on Roblox, Bhaumik asserted that Roblox’s “number one priority” is “to create a safe, civil, and inclusive community” and that “[s]afety and civility has always been baked into everything that we do.”³¹ That year, on a podcast, she also

²⁵ Hayley Tsukayama, *Roblox, an Online Kids Game, Explains How a Hack Allowed a Character’s Virtual ‘Rape’*, Wash. Post. (Jul. 17, 2018), <https://www.washingtonpost.com/technology/2018/07/17/roblox-an-online-kids-game-explains-how-hack-allowed-characters-virtual-rape/>.

²⁶ Chris Pollard, *Police Warn that Children as Young as Five-Years-Old are Seeing Naked Lego-Type Characters Having Sex on Roblox App*, The Sun (Jan. 29, 2018), <https://www.thesun.co.uk/news/5445444/roblox-app-children-danger-sex-warning/>.

²⁷ *Id.*

²⁸ YouTube, Digital Civility Panel (Oct. 23, 2019),

https://www.youtube.com/watch?v=XoUs1Js7WG0&list=PLcKphP00N1_kCLjvcOWdwbegJkNSL-CuL&index=6.

²⁹ *Id.*

³⁰ *Id.*

³¹ Video Interview with Tami Bhaumik, Roblox’s VP of Digital Civility & Partnerships (2022),

1 bragged about Roblox’s purported safety protections, including “thousands of human moderators
 2 on the front lines” and “machine learning that is constantly taking a look at chat filters.”³² With
 3 these and other measures, she exclaimed, “[a]ny sort of bad actor that comes onto the platform is
 4 dealt with swiftly” and “[w]e remove any content that’s reported to us within minutes.”³³

5 46. In 2023, Matt Kaufman, formerly the Chief Systems Officer for Roblox, was
 6 appointed Chief Safety Officer, at which point he too began peddling Roblox’s child safety
 7 narrative.

8 47. In a 2024 blog post on Roblox’s website, Kaufman asserted that “Roblox has spent
 9 almost two decades working to make the platform one of the safest online environments for our
 10 users, particularly the youngest users. Our guiding vision is to create the safest and most civil
 11 community in the world.”³⁴ According to Kaufman, “For users under 13, our filters block sharing
 12 of personal information and attempts to take conversations off Roblox, where safety standards and
 13 moderation are less stringent.”³⁵ A few months later, he added, “Safety is and always has been
 14 foundational to everything we do at Roblox.”³⁶

15 48. In a later blog post, Kaufman touted Roblox’s “track record of putting the safety of
 16 the youngest and most vulnerable people on our platform first.”³⁷

17 49. Kaufman also recently told *NPR* that “any time anything happens to a child that puts
 18 them at risk is one too many.”³⁸

19 _____
 20 <https://www.facebook.com/bedford.sheriff/videos/roblox-how-to-help-kids-use-itsafelyrobloxsvp-of-digital-civility-partnerships/1338989609901259/>.

21 ³² YouTube, Into the Metaverse, Podcast: EP.21: Tami Bhaumik (Roblox) - Building a Safe &
 22 Resilient Metaverse, https://www.youtube.com/watch?v=LT5_bBOYS9A.

23 ³³ *Id.*

24 ³⁴ Matt Kaufman, Chief Safety Officer, *Driving Civility and Safety for All Users*, Roblox (July 22,
 25 2024), <https://corp.roblox.com/newsroom/2024/07/driving-civility-and-safety-for-allusers>.

26 ³⁵ *Id.*

27 ³⁶ Matt Kaufman, Chief Safety Officer, *Major Updates to Our Safety Systems and Parental Controls*, Roblox (Nov. 18, 2024), <https://corp.roblox.com/newsroom/2024/11/major-updates-to-our-safety-systems-and-parental-controls>.

28 ³⁷ Matt Kaufman, Chief Safety Officer, *Scaling Safety and Civility on Roblox*, Roblox (Apr. 4, 2024), <https://corp.roblox.com/newsroom/2024/04/scaling-safety-civility-roblox>.

³⁸ Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety*

1
2 **C. In Reality, Roblox Is a Digital and Real-Life Nightmare for Children.**

3 50. Roblox's public statements and promises are carefully crafted to paint the picture of
4 a digital playground that is safe and appropriate for children. When parents, the press, or child
5 advocates raise questions and concerns, the company's highest executives respond with comforting
6 promises of safety.

7 51. This campaign of reassurance masks the truth about Roblox. Far from creating a
8 safe place for children, Roblox designed, built, and maintains a toxic environment that has enabled
9 obscene material to flourish and, worse, enables predatory pedophiles to hunt, groom, and sexually
10 exploit children. What Roblox represents as a safe, appropriate space for children is, in fact, a
11 digital and real-life nightmare for kids.

12 **1. Roblox hosts and promotes graphic, sexually explicit content.**

13 52. Roblox is a vast ecosystem offering an endless array of not just online games but
14 also immersive virtual worlds where children's customized avatars can engage in activities like
15 playing house, adopting pets, and mimicking adult behaviors, including sexually explicit ones.

16 53. These games and virtual worlds are brought to life through developer tools that
17 Roblox designs, controls, and makes available to third parties. These tools, which include scripting
18 capabilities, 3D modeling systems, and other software supply the infrastructure needed to create
19 content for the Roblox platform. Roblox has the power to control the use of these tools. Instead,
20 over the years, the company has given third parties essentially unfettered access to use the tools to
21 build what they want, with no meaningful oversight or safeguards. The results are deplorable.

22 54. As early as 2010, Roblox's virtual games had already devolved into hosting and
23 promoting sexually explicit content. Roblox's scripting language, which allows developers to
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Features, Past Cases of Child Abuse on the Platform, WBUR (Nov. 18, 2024),
<https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features>.

1 manipulate avatar activity and interactions any way they want, was deployed to create scenarios
2 where avatars engaged in simulated sexual activity.³⁹

3 55. This simulated sexual activity pervades Roblox. There have been numerous reports
4 of children's avatars being raped by other users' avatars. For example, in 2018, a seven-year-old
5 girl's avatar was violently raped by two male avatars *on a playground* in a Roblox experience,
6 which was witnessed by the girl's mother.⁴⁰ In describing the aftermath of this traumatic
7 experience, the girl's mother exclaimed, "I never in my wildest dreams would've ever imagined
8 that I would have to talk with my seven-year-old about rape."⁴¹

9 56. Roblox also hosts a staggering number of experiences centered on simulated sexual
10 activity. For instance, children can play in "condo games"—predatory digital environments,
11 including houses, where users can remove their avatars' virtual clothing, revealing nudity, and
12 engage in disturbing simulated sexual activities with other Roblox users.⁴² They can also play
13 games like "Public Bathroom Simulator Vibe," which allows access to users as young as nine
14 years old and enables users to simulate sexual activity in virtual bathrooms,⁴³ as well as virtual
15 strip clubs, where child avatars perform sexually explicit acts, like giving lap dances to patrons.⁴⁴

21 ³⁹ See, e.g., YouTube, *How to Do Roblox Sex Glitch*,
22 https://www.youtube.com/watch?v=Zz97Q1SQE_k; see also YouTube, *Roblox Sex?*,
<https://www.youtube.com/watch?v=hyqCHG6nUYI>.

23 ⁴⁰ Savannah Levins, *North Carolina Mom Outraged After Roblox Game Depicts Violent Acts,*
24 *Including Rape*, WFMYNews2 (June 30, 2018),
[https://www.wfmynews2.com/article/news/local/2-wants-to-know/north-carolina-mom-outraged-](https://www.wfmynews2.com/article/news/local/2-wants-to-know/north-carolina-mom-outraged-after-roblox-game-depicts-violent-acts-including-rape/83-569498171)
25 [after-roblox-game-depicts-violent-acts-including-rape/83-569498171](https://www.wfmynews2.com/article/news/local/2-wants-to-know/north-carolina-mom-outraged-after-roblox-game-depicts-violent-acts-including-rape/83-569498171).

26 ⁴¹ *Id.*

27 ⁴² EJ Dickson, *Inside the Underground Strip-Club Scene on Kid-Friendly Gaming Site Roblox*,
Rolling Stone (Sep. 12, 2021), [https://www.rollingstone.com/culture/culture-features/roblox-](https://www.rollingstone.com/culture/culture-features/roblox-virtual-strip-clubs-condo-games-sex-1197237/)
28 [virtual-strip-clubs-condo-games-sex-1197237/](https://www.rollingstone.com/culture/culture-features/roblox-virtual-strip-clubs-condo-games-sex-1197237/).

⁴³ Hindenburg Research, *supra* note 1.

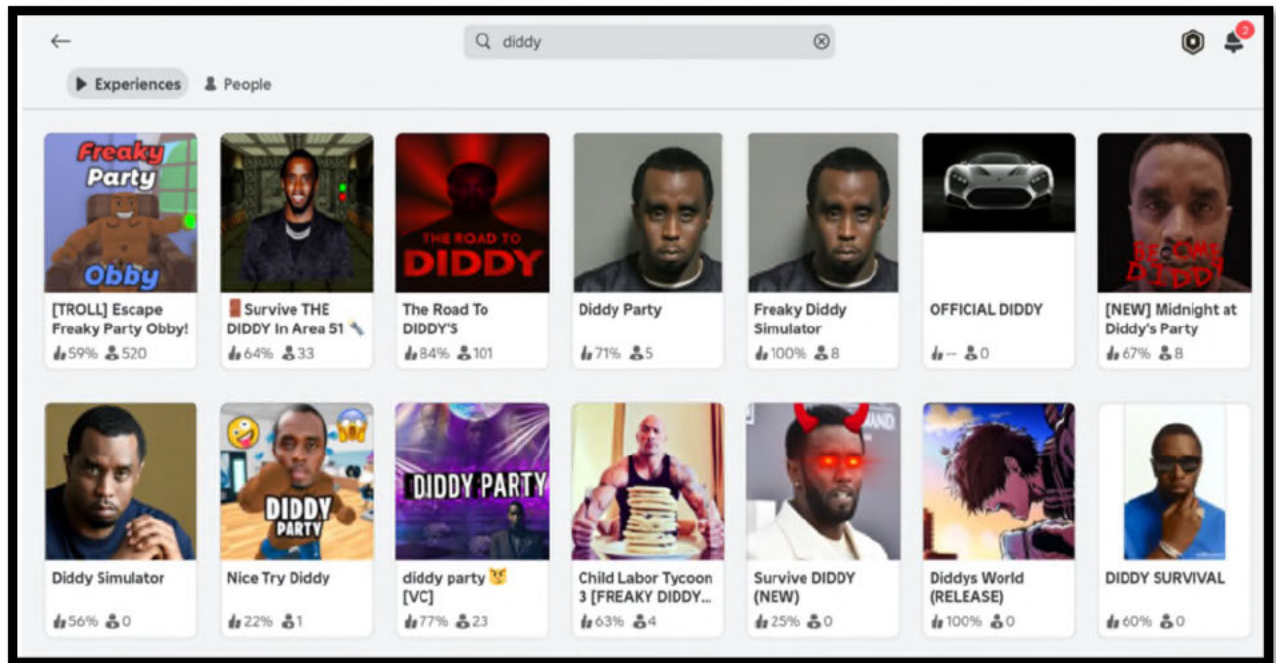
⁴⁴ Dickson, *supra* note 42.



*Roblox's Public Bathroom Simulator Game is rated ages nine and up and allows users to simulate sexual activity.*⁴⁵

57. A recent investigative report also exposed a multitude of other exploitative experiences on Roblox that recklessly trivialize and gamify serious criminal conduct, including rape. The report confirmed that Roblox actively hosted over 600 "Diddy" games, with titles like "Survive Diddy," "Run from Diddy Simulator," and "Diddy Party," which appear to recreate reported incidents involving the music mogul Sean Combs, publicly known as "Diddy." Diddy was indicted in 2024 on charges including sex trafficking of minors and other grievous criminal charges regarding allegations surrounding reports about "freak-off" parties—events which, according to multiple lawsuits and media reports, allegedly involved forced drug use, violent assaults, and the sex trafficking of minors, including victims as young as 10 years old.

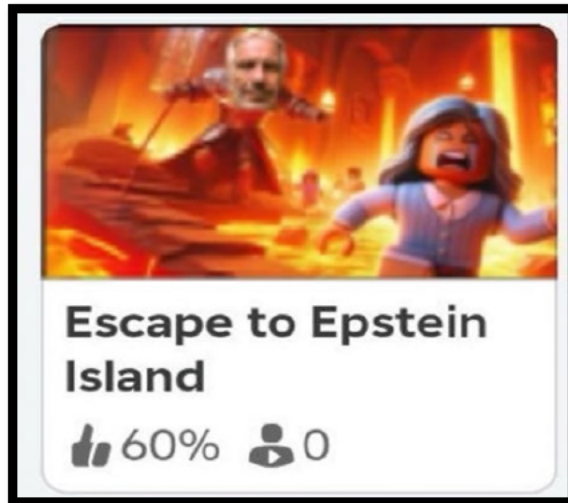
⁴⁵ Hindenburg Research, *supra* note 1.



Examples of Roblox games modeled after Diddy's sex trafficking ventures.⁴⁶

58. This report also revealed that Roblox permitted more than 900 Roblox accounts displaying variations of convicted sex trafficker Jeffrey Epstein's name, such as "JeffEpsteinSupporter," whose account Roblox actively permitted to be openly engaged in children's games. Roblox also allowed games like "Escape to Epstein Island"—a title that directly references one of the locations where for years Epstein trafficked minors and other non-consenting individuals so he and others could sexually and physically abuse them.

⁴⁶ *Id.*



Example of Roblox game modeled after Jeffrey Epstein's sex trafficking ventures.⁴⁷

59. Roblox played a direct role in enabling these rampant, sexually exploitative experiences. Roblox is fully aware that these experiences pervade its app, and it allows them to continue to exist unchecked despite the ability to control or eliminate them. Leaked internal Roblox documents reveal that Roblox monitored this type of content and made decisions such as “[h]ow big of a ‘bulge’” was acceptable, and, with the introduction of layered clothing for avatars (*i.e.*, allowing avatars to wear multiple layers of clothing), whether players could be nude.⁴⁸ By allowing this type of content to exist and be easily accessible, Roblox directly contributed to the proliferation of games simulating sexual activity, such as condo games and virtual strip clubs.

60. The effects of these games on children can be devastating. Playing video games with explicit sexual content normalizes exploitative and predatory behavior, blurring the lines of what is acceptable in real life. This is particularly harmful for children, who are still developing their understanding of social norms and morality. When such behavior is depicted as humorous, exciting, or rewarded within a game, young players can internalize the idea that harassment or sexual exploitation is harmless or even acceptable.

⁴⁷ *Id.*

⁴⁸ Joseph Cox & Emanuel Malberg, *Leaked Documents Reveal How Roblox Handles Grooming and Mass Shooting Simulators*, Vice (Aug. 1, 2022), <https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/>.

1 61. Studies support this connection. One study found that playing games with
2 sexualized content was linked to increased rates of sexual harassment toward female targets,
3 suggesting that such exposure desensitizes players to the real-world consequences of these
4 actions.⁴⁹ Another study showed that playing mature-rated games was associated with higher rates
5 of risky sexual behavior years later, highlighting the long-term impact of exposure to sexualized or
6 exploitative content.⁵⁰

7 62. The interactive nature of games amplifies this effect. Unlike passive media, video
8 games require players to actively participate in behaviors, including those that simulate
9 harassment or exploitation, reinforcing the perception that such actions are normal or desirable.
10 This environment not only desensitizes children but also makes them more likely to replicate these
11 actions in real-world interactions.

12 63. The dangerous content on Roblox is not limited to online games. The recent
13 investigative report discussed above found that a basic search for “adult” in Roblox revealed a
14 group with 3,334 members “openly trading child pornography and soliciting sexual acts from
15 minors.”⁵¹ And tracking these members unearthed additional Roblox groups engaged in the same
16 criminal conduct, including one massive group with 103,000 members.⁵² Yet Roblox failed to
17 implement any age restrictions on these criminal groups, deliberately leaving them accessible to
18 all users.⁵³

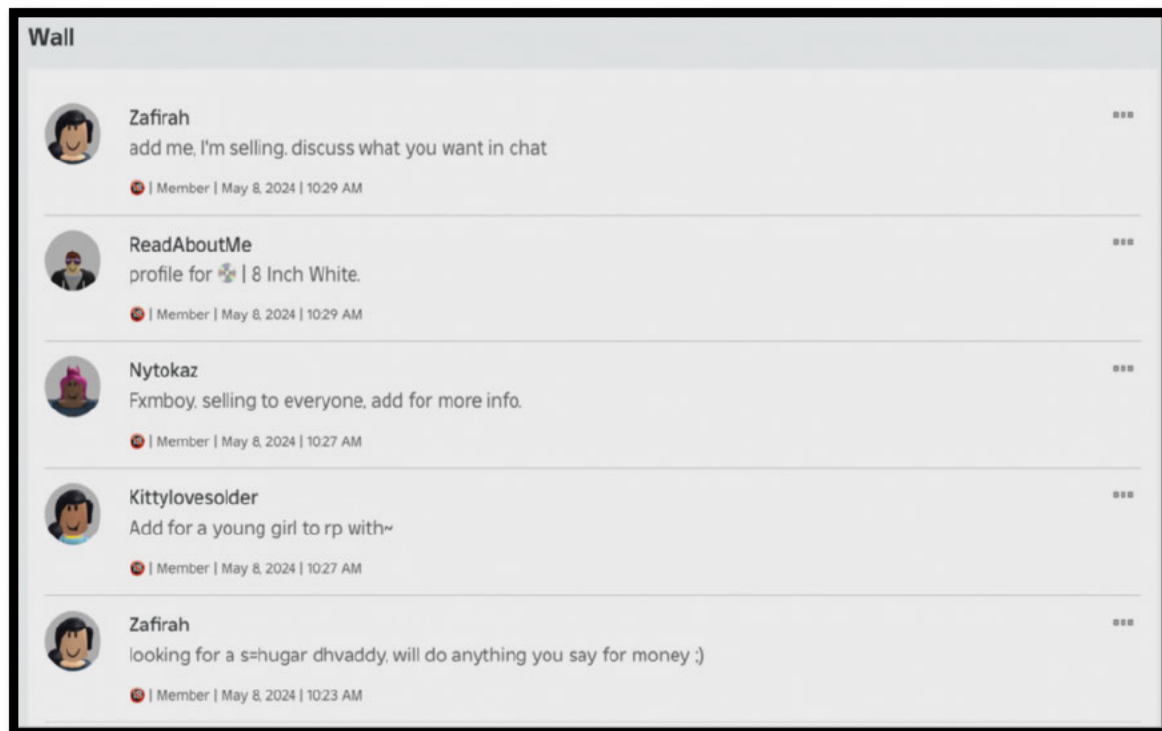
24
25 ⁴⁹ Jonathan Burnay, Brad J. Bushman & Frank Larøi, *Effects of Sexualized Video Games on*
Online Sexual Harassment, 45 *Aggressive Behavior* 2, 214 (March/April 2019).

26 ⁵⁰ Jay G. Hull et al., *A Longitudinal Study of Risk-Glorifying Video Games and Behavior*
Deviance, *J. Pers. Soc. Psychol.* 2014 August; 107(2): 300–325. doi:10.1037/a0036058.

27 ⁵¹ Hindenburg Research, *supra* note 1.

28 ⁵² *Id.*

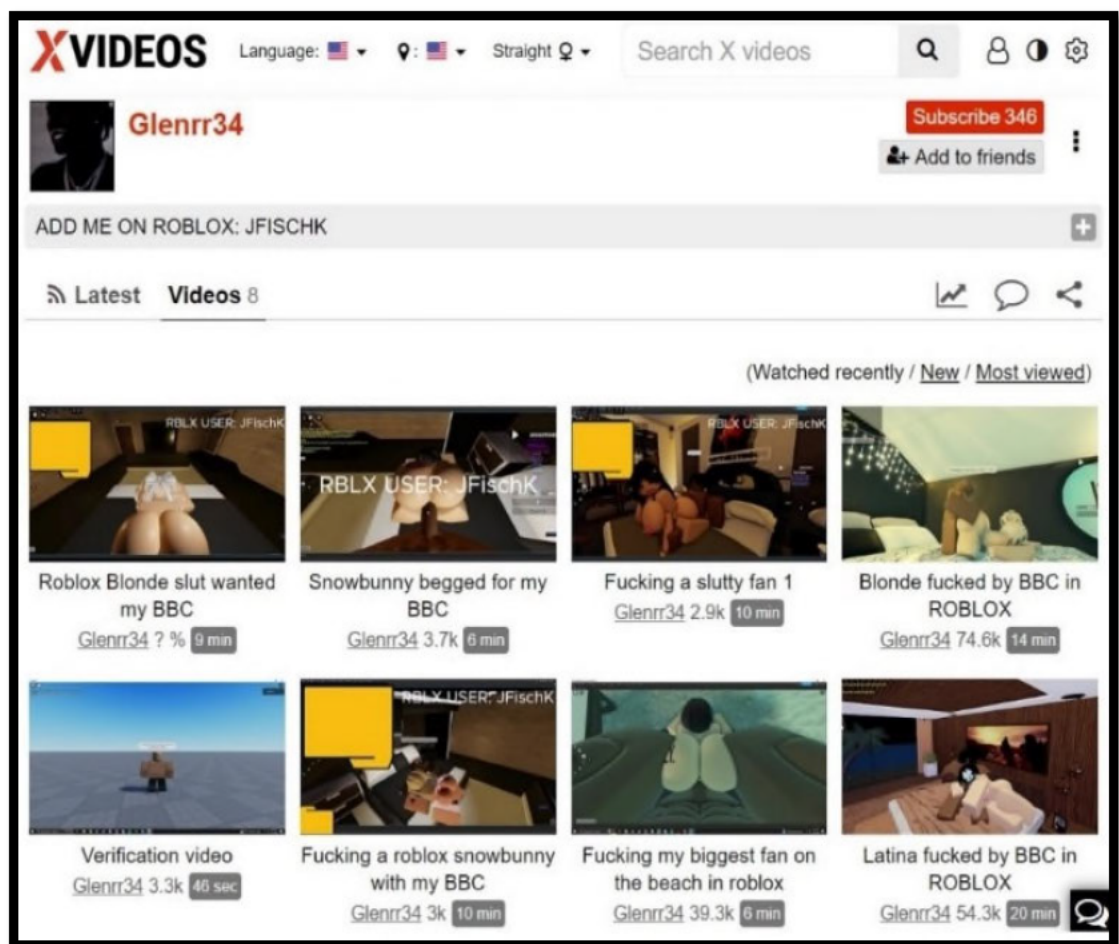
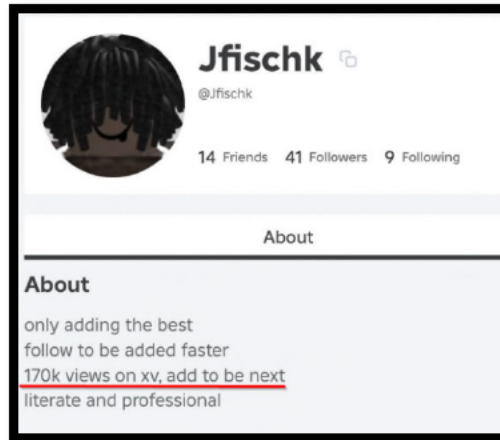
⁵³ *Id.*



Public chat wall for a group named "Adult Studios," where users openly solicited child pornography.⁵⁴

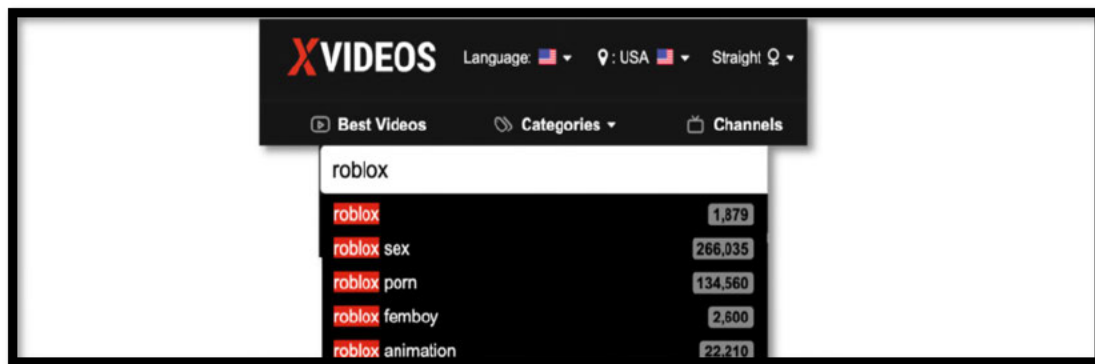
64. Roblox has also enabled individuals to create an entire category of pornographic content. Using Roblox's tools and software, users make virtual sex videos between avatars on Roblox. These videos are clearly marked with the .rbxl file extension—Roblox's proprietary file format—establishing that this content was created within the Roblox application. Moreover, on XVideos, a porn website, Roblox users seek out other users to simulate sexual acts within seemingly innocuous games, like Brookhaven, which is one of Roblox's most popular experiences and is available to all users, regardless of age.

⁵⁴ *Id.*

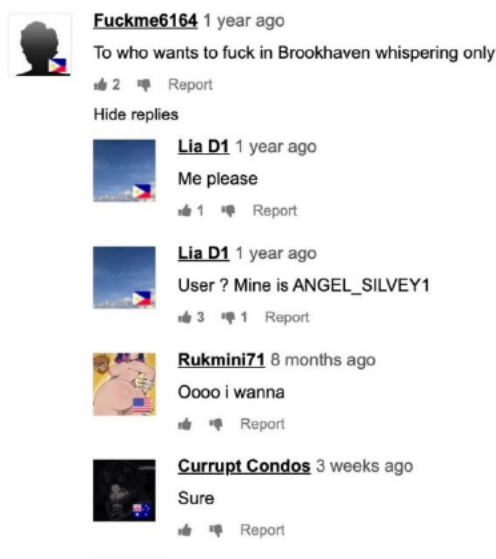


This Roblox user advertised their Roblox account on porn website, XVideos, where they had uploaded videos of their avatar having sex with other Roblox users.⁵⁵

⁵⁵ *Id.*



Searching "Roblox" on XVideos, a porn website, yields more than 250,000 results.⁵⁶



The comment section on a Roblox porn video on XVideos – Brookhaven is one of Roblox's most popular games and is available to users of all ages.⁵⁷

65. In sum, the online environment that Roblox hosts and enables contradicts its representations of providing a safe product, demonstrating Roblox's blatant disregard for the safety of its youngest users and revealing the company's prioritization of user engagement over its fundamental duty to protect young users.

⁵⁶ *Id.*

⁵⁷ *Id.*

1 **2. Roblox provides a hunting ground for child-sex predators.**

2 66. For years, Roblox has served as an online platform of choice for predators seeking
3 to find, groom, abuse, and exploit children. Roblox provides predators with easy access to tens of
4 millions of children and allows these predators to freely move between inappropriate content and
5 popular games to identify and target vulnerable young users. By doing so, Roblox has demonstrated
6 reckless indifference to its fundamental obligation not to create and foster an environment that
7 places children at significant risk of sexual exploitation.

8 67. These systematic patterns of exploitation on Roblox follow a predictable and
9 preventable sequence that the company has known about and facilitated for years: a predator
10 misrepresents their age to other users on the app, cosplaying as a fellow child, methodically
11 befriends the vulnerable young victim, and then strategically manipulates the child to move the
12 conversation off Roblox to other apps—often Discord.

13 68. As the recent *Bloomberg Businessweek* article titled *Roblox’s Pedophile Problem*
14 put it, “These predators weren’t just lurking outside the world’s largest virtual playground. They
15 were hanging from the jungle gym, using Roblox to lure kids into sending photographs or
16 developing relationships with them that moved to other online platforms and, eventually, offline.”⁵⁸

17 69. Roblox, in effect, serves as an initial access point to children for predators. Media
18 reports have repeatedly highlighted that Roblox “is being used as a first point of contact for
19 predators.”⁵⁹ The children, due to their underdeveloped brains, are more trusting and naïve, and
20 often fail to recognize the danger of providing their usernames on other sites.

21 70. Once on another app, like Discord, predators escalate their exploitation by soliciting
22 explicit material, like nude photos or videos of children doing sexually inappropriate acts, all of
23 which constitute child pornography. And while the ultimate solicitation of explicit photos or other
24 criminal acts may occur on other apps, Roblox serves as the critical facilitator that enables these

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27 ⁵⁸ Carville & D’Anastasio, *supra* note 8.

28 ⁵⁹ National Center on Sexual Exploitation, *The Dirty Dozen List ’24: Roblox*,
<https://endsexualexploitation.org/roblox/> (last updated Dec. 4, 2024).

1 predators to first identify, target, and gain the trust of young victims through its app's design and
2 inadequate safety measures.

3 71. Roblox's app and profit-driven virtual currency system enable predators to exploit
4 children, often by trading or extorting Robux in exchange for explicit photos. Predators commonly
5 offer children Robux for these photos or demand Robux to avoid publicly releasing them, directly
6 tying Roblox's profits to the sexual exploitation of children. Roblox's manipulative reward systems
7 and social dynamics, intentionally designed to exploit children's developmental vulnerabilities,
8 create psychological pressures that predators weaponize for extortion.

9 72. Despite full awareness of how its app facilitates such exploitation, Roblox continues
10 to profit from these tactics by collecting transaction fees on Robux exchanges. Its reckless
11 indifference to the consequences of its deliberately engineered app mechanics highlights its
12 prioritization of profits over the safety and well-being of its young users.

13 73. Roblox enables another pattern of predatory grooming in which predators employ
14 immediate blackmail tactics and make no attempt to ingratiate themselves with the children, but
15 instead threaten them from the outset. The predator will often threaten to post nude photos of others
16 online, but claim that the child victim is the person depicted unless the child complies with the
17 predator's demands. Through its deliberately insufficient monitoring systems, Roblox allows
18 predators to threaten children with false claims about possessing and potentially releasing explicit
19 photos, coercing young victims into complying with criminal demands.

20 74. Regardless of how the initial grooming relationship begins, which is often as simple
21 as someone asking the child to be their boyfriend or girlfriend, the predators also often attempt to
22 make in-person contact with the child. The dangerous progression from Roblox's online app to
23 real-world violence reveals the devastating consequences of the company's product. Roblox's app
24 enables predators to escalate from virtual contact to orchestrating physical meetings, leading to
25 harassment, kidnapping, trafficking, violence, and sexual assault of minors, all instances of which
26 these children suffered as a direct result of Roblox's actions.

1 75. Through numerous well-documented and publicized cases, Roblox has long been
2 aware of the systemic exploitation that its app enables and facilitates. For years, countless children
3 have been sexually exploited and abused by predators they met on Roblox.

4 76. For example, in 2017, Roblox's app enabled a predator to target an eight-year-old
5 child and solicit explicit photos, prompting one mother to observe that Roblox had created "the
6 perfect place for pedophiles."⁶⁰

7 77. In 2018, Roblox's app enabled a predator posing as a child to coerce a nine-year-old
8 girl into performing and filming sexually abusive acts on her four-year-old brother through violent
9 threats, including of death, against her family.⁶¹ That year, 24 men in New Jersey were also charged
10 with soliciting sex from minors as part of a sting operation, where the New Jersey State Police
11 Lieutenant specifically called out Roblox as a place where "individuals are posing as someone else"
12 in order "to gain someone's trust."⁶²

13 78. In 2019, a Florida predator systematically used Roblox to target children ages 10-
14 12, moving them to Discord to coerce the children into sending him naked pictures of themselves.⁶³
15 That year, a man in Wales encouraged 150 children to engage in sexual activity by contacting them
16 through Roblox, where he pretended to be a child and used fake names.⁶⁴

19 ⁶⁰ Pei-Size Cheng, Evan Stulberger & Dave Manney, *I-Team: Popular Online Gaming Site for*
20 *Kids is Breeding Ground for Child Sex Predators, Mother Says*, NBC New York (Apr. 6, 2017),
21 <https://www.nbcnewyork.com/news/local/video-game-warning-roblox-child-sex-predator-online-site-investigation-what-to-know/87438/>.

22 ⁶¹ Briana Barker, *Internet Safety and Your Children: How Kids are at Risk*, Record-Courier (Mar.
23 27, 2018), <https://www.record-courier.com/story/news/2018/03/27/internet-safety-your-children-how/12899346007/>.

24 ⁶² *Cop, Firefighter Among 25 Charged in Child Luring Sting*, FOX 13 TAMPA BAY (Sep. 25, 2018),
<https://www.fox13news.com/news/cop-firefighter-among-24-charged-in-child-luring-sting>.

25 ⁶³ Max Chesnes, *Deputies Say Vero Beach Man Used Popular Video Game Platforms to Target*
26 *Children*, TC Palm (Aug. 20, 2019), <https://www.tcpalm.com/story/news/crime/indian-river-county/2019/08/20/detectives-advice-online-safety-after-vero-beach-man-used-video-game-platforms-target-minors/2059599001/>.

27 ⁶⁴ Liz Day, *Paedophile Groomed 150 Children to Engage in Sexual Activity Using Online Game*
28 *Roblox*, Wales Online (May 10, 2019), <https://www.walesonline.co.uk/news/wales-news/paedophile-groomed-150-children-engage-16258877>.

79. During the pandemic, reports of child sex abuse facilitated by Roblox accelerated. In 2020, for example, Roblox enabled a 47-year-old predator to pose as a teenager, target a 16-year-old girl, move the conversation to Facebook, solicit explicit photos and videos, all of which constituted child pornography,⁶⁵ and ultimately traffic her across state lines, raping her multiple times.⁶⁶ In Michigan, a man was arrested for persuading an eight-year-old girl to send him videos of herself, in various stages of undress, in exchange for Robux.⁶⁷ The perpetrator had been arrested for similar offenses three years earlier and was a registered sex offender in Kansas. This perpetrator was not the only convicted sex offender who was able to freely create accounts on Roblox: in 2021, a convicted sex offender used Roblox to sexually solicit a 12-year-old child.⁶⁸ And in 2022, a 33-year-old man groomed a 13-year-old girl on Roblox, transported her from her home in Kansas to his home in Georgia, and raped her multiple times.⁶⁹

80. 2023 was more of the same. For example, a 30-year-old man was arrested for soliciting illicit photos from young victims and authorities reported that he had three separate Roblox accounts.⁷⁰ A 27-year-old man was arrested for kidnapping an 11-year-old girl whom he met on Roblox.⁷¹ A 23-year-old New Jersey man, who was a prominent Roblox developer with a

⁶⁵ U.S. Dep't of Justice, *Magnolia Man Gets Life For Exploiting Young Female He Met and Communicated With Via Roblox and Facebook* (Oct. 15, 2020), <https://www.justice.gov/usao-sdtx/pr/magnolia-man-gets-life-exploiting-young-female-he-met-and-communicated-roblox-and>.

⁶⁶ *United States v. McGavitt*, 28 F.4th 571, 578 (5th Cir. 2022).

⁶⁷ *Man Arrested for Inappropriate Relationship with 8-Year-Old Bloomfield Twp. Girl Through Roblox*, WXYZ Detroit (Sep. 24, 2020), <https://www.wxyz.com/news/man-arrested-for-inappropriate-relationship-with-8-year-old-bloomfield-twp-girl-through-roblox>.

⁶⁸ Jeff Bonty, *Man Charged With Soliciting Juvenile Through Roblox*, Daily Journal (Jul. 23, 2021), <https://www.shawlocal.com/daily-journal/>.

⁶⁹ Fox 5Atlanta Digital Team, *Clayton County Man Charged with Sex Trafficking, Rape of 13-year-old Girl He Met on Gaming App Roblox*, Fox5 (Mar. 2, 2022), <https://www.fox5atlanta.com/news/clayton-county-man-charged-with-sex-trafficking-rape-of-kansas-girl>.

⁷⁰ City of Fontana Police Department, *Internet Predator Arrested*, Facebook (Dec. 20, 2023), <https://www.facebook.com/watch/?v=338311109095057>.

⁷¹ *Man Charged in Kidnapping of 11-year-old He Met Through Roblox from Her NJ Home: Police*, ABC7 (Oct. 21, 2023), <https://abc7ny.com/roblox-kidnapping-new-jersey-online-grooming/13927383/>.

1 known history of exploiting children via Roblox, was sentenced to 15 years in prison for grooming
2 a 15-year-old girl, transporting her to his house, and sexually abusing her.⁷²

3 81. Similar incidents continued throughout 2024. For example, a 21-year-old Chilean
4 man was arrested for traveling to the U.S. to meet an underage girl he met on Roblox, where he
5 had “spent several months manipulating and grooming” her.⁷³ A 21-year-old in California pled
6 guilty for directing a 10-year-old girl, whom he met on Roblox, to disrobe and touch herself.⁷⁴ A
7 64-year-old man admitted to posing as a 13-year-old boy on Roblox, where he met a 12-year-old
8 girl and convinced her to send sexually explicit photos of herself and a young relative.⁷⁵ A 29-year-
9 old Michigan befriended and groomed an 11-year-old girl on Roblox by posing as a teenager and
10 then coerced the girl into sending multiple explicit photos of herself.⁷⁶ And a 24-year-old man raped
11 a 10-year-old girl he had met on Roblox.⁷⁷

12 82. Despite supposed “parental controls” that Roblox implemented in 2024 and 2025,
13 predators continue to enjoy easy access to children on the app, causing devastating harm. For
14 example, in April 2025, a California man was arrested and charged with kidnapping and engaging
15 in unlawful sexual conduct with 10-year-old girl whom he met and communicated with on
16

17 ⁷² U.S. Dep’t of Justice, *New Jersey Man Sentenced to 15 Years in Federal Prison After Grooming*
18 *Minor Online and Transporting Her Across State Lines Via Uber for Sex* (Aug. 30, 2023),
19 <https://www.justice.gov/usao-sdin/pr/new-jersey-man-sentenced-15-years-federal-prison-after-grooming-minor-online-and>.

20 ⁷³ Grace Toohey, *Chilean Man Groomed 13-Year-Old Girl He Met on Roblox Before Flying to U.S. to Meet Her, Police Say*, L.A. Times (Aug. 22, 2024),
21 <https://www.latimes.com/california/story/2024-08-22/chilean-arrest-roblox-child-exploitation>.

22 ⁷⁴ Ashley Harting, *Online Predator Who Targeted 10-Year-Old on Roblox Pleads Guilty in Butte County*, KRCR (Sep. 25, 2024), <https://krcrtv.com/news/local/online-predator-who-targeted-10-year-old-on-roblox-pleads-guilty-in-butte-county>.

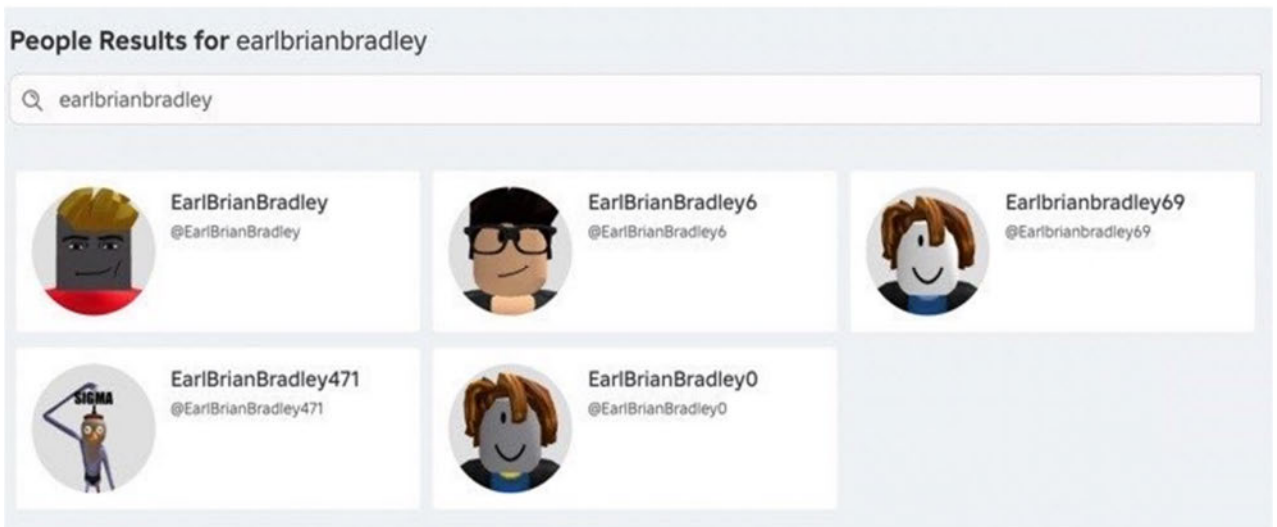
23 ⁷⁵ Travis Schlepp, *Man, 64, Admits to ‘Catfishing’ Girl on Roblox, Convincing Her to Send Explicit Images*, KTLA 5 (Jul. 26, 2024), <https://ktla.com/news/california/man-64-admits-to-catfishing-girl-on-roblox-convincing-her-to-send-explicit-images/>.

24 ⁷⁶ Michael Martin, *Roblox Predator: School Staffer Accused of Grooming West Michigan Child for Illicit Photos*, Fox17 West Michigan (Jan. 16, 2025),
25 <https://www.fox17online.com/news/local-news/roblox-predator-school-staffer-accused-of-grooming-west-michigan-child-for-illicit-photos>.

26 ⁷⁷ Martin Robinson, *Roblox Predator Who Raped 10-year-old Girl is Locked Up: Paedophile Who Targeted Child He Met on Gaming Platform Is Jailed for Six Years*, Daily Mail (Jan. 17, 2025),
27 <https://www.dailymail.co.uk/news/article-14278563/Roblox-predator-raped-10-year-old-girl.html>.
28

1 Roblox.⁷⁸ The next month, a 17-year-old Florida teenager was arrested after authorities learned he
 2 had been communicating on Roblox with numerous children, some as young as eight years old,
 3 over the course of a year and convinced them to send him sexually explicit images of themselves.⁷⁹
 4 And just a few days later, a New York man who used Roblox to connect with 11- and 13-year-old
 5 girls was arrested and federally charged with enticement and possession of child pornography.⁸⁰

6 83. While most predators on Roblox lure children into their grasp by pretending to also
 7 be children, many predators do not even hide their intentions, roaming Roblox with usernames like
 8 “@Igruum_minors,” “@RavpeTinyK1dsJE,” and “@EarlBrianBradley”—a reference to one of the
 9 most prolific pedophiles ever, who raped and molested hundreds of children.



19 *Results from an account search for “earlbrianbradley.”*⁸¹

20

21

22

23 ⁷⁸ *Elk Grove Man Accused of Kidnapping Kern County Girl He Communicated with on Roblox*,
 24 CBS News (Apr. 18, 2025), [https://www.cbsnews.com/sacramento/news/elk-grove-man-accused-](https://www.cbsnews.com/sacramento/news/elk-grove-man-accused-kidnapping-kern-county-girl-roblox/)
[kidnapping-kern-county-girl-roblox/](https://www.cbsnews.com/sacramento/news/elk-grove-man-accused-kidnapping-kern-county-girl-roblox/).

25 ⁷⁹ Briana Trujillo, *Ocala 17-Year-Old Convinced Kids to Send Him Sex Abuse Material on*
 26 *Roblox*, NBC (May 2, 2025), [https://www.nbcmiami.com/news/local/ocala-17-year-old-](https://www.nbcmiami.com/news/local/ocala-17-year-old-convinced-kids-to-send-him-sex-abuse-material-on-roblox-sheriff/3605691/)
[convinced-kids-to-send-him-sex-abuse-material-on-roblox-sheriff/3605691/](https://www.nbcmiami.com/news/local/ocala-17-year-old-convinced-kids-to-send-him-sex-abuse-material-on-roblox-sheriff/3605691/).

27 ⁸⁰ U.S. Dep’t of Justice, *Fairport Man Who Used Roblox to Attempt to Communicate with Minors*
 28 *for Sex Arrested* (May 6, 2025), [https://www.justice.gov/usao-wdny/pr/fairport-man-who-used-](https://www.justice.gov/usao-wdny/pr/fairport-man-who-used-roblox-attempt-communicate-minors-sex-arrested)
[roblox-attempt-communicate-minors-sex-arrested](https://www.justice.gov/usao-wdny/pr/fairport-man-who-used-roblox-attempt-communicate-minors-sex-arrested).

⁸¹ Hindenburg Research, *supra* note 1.

84. Roblox’s systematic endangerment of children has been publicly condemned by leading advocacy organizations. The National Center on Sexual Exploitation (“NCSE”) has consistently named Roblox to its “Dirty Dozen” list—an annual campaign exposing companies that facilitate, enable, or profit from sexual exploitation. The NCSE blasts Roblox for “treat[ing] child protection like a game.”⁸² According to the NCSE, “[u]ntil basic child protection standards are met, Roblox remains too high risk for kids.”⁸³

85. Parent reviews of Roblox on sites like *Common Sense Media* also document disturbing incidents of naked avatars, sexting, simulated sexual assault, and adult predators.⁸⁴

86. The harm from this child abuse and exploitation extends beyond the initial victims. Through the design of its app and inadequate safeguards, Roblox has created an abusive ecosystem where former victims—children who were once exploited on Roblox—become teenage perpetrators who then prey upon younger users, making today’s victims tomorrow’s perpetrators. Indeed, researchers have repeatedly confirmed this victim-victimizer pipeline: when children are exposed to and victimized by sexual content, they are more likely to become desensitized teenagers and adults who then exploit younger users in the same ways.⁸⁵ In effect, Roblox contributes to this “raising of” predators who perpetuate the cycle of exploitation.

87. The magnitude of the harm caused by Roblox is devastating. Yet rather than warn parents, Roblox minimizes these dangers through repeated misleading public statements. Roblox’s Chief Safety Officer, Matt Kaufman, attempting to deflect attention from serious safety failures, told NPR, “I think we’re losing sight of the tens of millions of people where Roblox is an incredibly

⁸² National Center on Sexual Exploitation, *supra* note 59.

⁸³ *Id.*

⁸⁴ Common Sense Media, *Parent Reviews of Roblox*, <https://www.commonsensemedia.org/website-reviews/roblox/user-reviews/adult> (last visited Feb. 11, 2025).

⁸⁵ James RP Ogloff, Margaret C. Cutajar, Emily Mann & Paul Mullen, *Child Sexual Abuse and Subsequent Offending and Victimization: A 45 Year Follow-Up Study*, Trends & Issues in Crime & Criminal Justice No. 440 (Jun. 2012), <https://www.aic.gov.au/sites/default/files/2020-05/tandi440.pdf>; M. Glasser et al., *Cycle of Child Sex Abuse: Links Between Being a Victim and Becoming a Perpetrator*, British J. Psychiatry (2001).

1 enriching part of their life.”⁸⁶ And while Kaufman publicly claims that “any time anything happens
 2 to a child that puts them at risk is one too many,”⁸⁷ Roblox simultaneously admitted to investors
 3 that it was “unable to prevent all such [inappropriate] interactions from taking place.”⁸⁸ This
 4 calculated contradiction between public messaging and private admissions—telling parents that
 5 even one incident is unacceptable while simultaneously acknowledging to investors that abuse is
 6 inevitable—exposes Roblox’s strategy of prioritizing public relations through hollow and
 7 misleading public statements over its fundamental duty to protect children.

8 **D. Roblox Knowingly Causes and Facilitates the Sexual Exploitation of Children.**

9 88. The reason that Roblox is overrun with harmful content and predators is simple:
 10 Roblox prioritizes user growth, revenue, and eventual profits over child safety. For years, Roblox
 11 has knowingly prioritized these numbers over the safety of children through the actions it has taken
 12 and decisions it has made to increase and monetize users regardless of the consequences.

13 **1. Roblox prioritizes growth over child safety.**

14 89. From its inception, Roblox has focused on growth above all else, which has meant
 15 deliberately targeting, exploiting, and capitalizing on the underdeveloped child market, positioning
 16 itself as a place where kids can learn and play games in a safe environment. Recognizing that
 17 children have more free time, underdeveloped cognitive functioning, and diminished impulse
 18 control, Roblox has exploited their vulnerability to lure them to its app.

19 90. Roblox’s business model allowed the company to attract significant venture capital
 20 funding from big-name investors like Kleiner Perkins and Andreessen Horowitz, putting enormous
 21 pressure on the company to prioritize growing and monetizing its users. To do so, Roblox made
 22 deliberate decisions that placed children at risk. For example, while other digital platforms
 23 (including other video game platforms) verified users’ ages and restricted communications between
 24

25 _____
 26 ⁸⁶ Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety*
 27 *Features, Past Cases of Child Abuse on the Platform*, WBUR (Nov. 18, 2024),
<https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features>.

28 ⁸⁷ *Id.*

⁸⁸ Roblox Corp., S-1 (Securities Registration Statement) 24 (Nov. 19, 2020).

1 children and adults, Roblox did not require age verification and did not restrict communications
2 between children and adults. Similarly, while other digital platforms required children’s accounts
3 to be connected to the account of a parent or guardian during set-up, with various parental controls
4 turned on by default, it is easy for children (including very young children) to download and install
5 Roblox without involving an adult. While other platforms implemented reliable, accurate age
6 ratings for games and videos that correctly informed parents about the type of content their children
7 would see, Roblox’s deeply flawed “content label” system gave parents a false sense of security,
8 incorrectly labelling graphic sexual and violent games as safe for kids. And while other platforms
9 restricted access if a child fell below a certain age, Roblox welcomed and encouraged children of
10 any age, despite knowing of the significant harms that children routinely experience there.

11 91. In 2021, riding the explosive growth in users generated by the pandemic and the
12 pandemic-driven enthusiasm for technology stocks, Roblox went public at a valuation of \$41
13 billion, which brought new pressures. To satisfy the scrutiny and demands of public market
14 investors, Roblox, like many unprofitable companies, prioritized rapid growth in revenue and user
15 engagement metrics—like new user acquisition, daily active users, and average hours spent on the
16 app—on the theory that profitability would follow once the business achieved sufficient scale and
17 operating costs decreased as a percentage of revenue.⁸⁹

18 92. In pursuit of growth, Roblox deprioritized safety measures even further so that it
19 could report strong numbers to Wall Street. For instance, Roblox executives rejected employee
20 proposals for parental approval requirements that would protect children on the platform.⁹⁰

23
24 ⁸⁹ After listing on the New York Stock Exchange, Roblox CEO David Baszucki told CNBC,
25 “Roblox has been growing for 15 years That’s a long-term growth path, and we believe that
26 continues forward, even after Covid.” Ari Levy & Jessica Bursztynsky, *Roblox Jumps to \$38*
27 *Billion Mark Cap as Public Investors Get Their First Crack at the Popular Kids Game App*,
28 CNBC (Mar. 10, 2021), <https://www.cnbc.com/2021/03/10/roblox-rblx-starts-trading-at-64point50-after-direct-listing.html>. CFO Michael Guthrie added, “As [Covid] restrictions ease, we expect the rates of growth in 2021 will be well below the rates in 2020, however, we believe we will see absolute growth in most of our core metrics for the full year.” *Id.*

⁹⁰ Hindenburg Research, *supra* note 1.

1 Employees also reported feeling explicit pressure to avoid any changes that could reduce platform
2 engagement, even when those changes would protect children from predators.⁹¹

3 93. As one former Roblox employee explained, “You’re supposed to make sure that
4 your users are safe but then the downside is that, if you’re limiting users’ engagement, it’s hurting
5 our metrics. It’s hurting the active users, the time spent on the platform, and in a lot of cases, the
6 leadership doesn’t want that.”⁹² That same employee added, “You have to make a decision, right?
7 You can keep your players safe, but then it would be less of them on the platform. Or you just let
8 them do what they want to do. And then the numbers all look good and investors will be happy.”⁹³

9 94. By limiting safety measures, Roblox not only increased its users but also reduced
10 the company’s safety expenses as a percentage of its revenue—a key metric for Wall Street, which
11 views trust and safety costs as detrimental to Roblox’s stock performance. Barclays, for example,
12 identified its “downside case” for Roblox’s stock as “additional safety investments due to its
13 younger demographic . . . becom[ing] a drag on [earnings] margins.”⁹⁴ Barclays also wrote that it
14 viewed increased safety costs as a “negative” in Roblox’s quarterly earnings.⁹⁵

15 95. During earnings calls for investors, Roblox frequently addresses questions from
16 analysts about how trust and safety expenditures will evolve over time. Roblox’s answers reveal
17 that the company is hyper-focused on reducing its trust and safety expenses as a percentage of its
18 revenue, showing that the company is not investing as much proportionally in trust and safety as
19 the company continues to grow and attract millions of additional users.

20 96. For example, on Roblox’s 2023 fourth quarter earnings call, an analyst praised the
21 “really high level of efficiency” seen in the numbers for infrastructure and trust and safety
22 expenditures and then asked how those figures would evolve over time.⁹⁶ In response, Mike
23 _____

24 ⁹¹ *Id.*

25 ⁹² *Id.*

26 ⁹³ *Id.*

27 ⁹⁴ Ross Sandler, Trevor Young & Alex Hughes, *Back on Track Following the 1H Hiccup*,
Barclays (Aug. 1, 2024)

28 ⁹⁵ Ross Sandler, Trevor Young & Alex Hughes, *Everything Accelerating, Safety & Security a Top Priority*, Barclays (Nov. 1, 2024)

⁹⁶ Q4 2023 Earnings Call (Feb. 7, 2024).

1 Guthrie, Roblox’s CFO, emphasized the company’s goal of reducing expenses, stating, “cost to
 2 serve is the metric that we use and it’s the metric that the [infrastructure] team owns . . . *they’re*
 3 *working hard to drive that down* [L]ike you said, it’s about 11% now, ultimately with higher
 4 efficiency . . . we see that as a high-single-digit number over the next few years.”⁹⁷ He added, “[W]e
 5 still think there’s more to do there.”⁹⁸

6 97. At other times, Guthrie has reassured investors stating, “look for trust and safety
 7 [costs] to scale below linear as we grow”⁹⁹ and that Roblox was “quite happy with” trust and safety
 8 costs growing “at a lower rate than our bookings growth.”¹⁰⁰

9 98. Similarly, in the second quarter of 2024, CEO Baszucki highlighted that,
 10 “[i]mportantly, our infrastructure and trust and safety expenditures were 8% lower year-on-year.”¹⁰¹

11 99. Once public, Roblox also decided to try to attract more adult users to its app—which
 12 it had historically touted as the “#1 gaming site for kids and teens.”¹⁰² With the market for underage
 13 users near saturation, Roblox shifted its growth strategy to attracting older users.

14 100. In its public offering filings, Roblox identified “age demographic expansion” as a
 15 key strategy, explaining that it planned to develop experiences and content that appealed to older
 16 users.¹⁰³ For Roblox, “aging up” had benefits beyond user growth—it was also more profitable.
 17 Older users offered a distinct financial advantage. While children spend more hours on Roblox,
 18 they do not “monetize” as well because they are more constrained in their ability to spend. In
 19 contrast, older users, who “have more direct control over their spend” and “monetize better,” are
 20 far more lucrative—an outcome that Roblox said it predicted when it started to target older users.¹⁰⁴

23 ⁹⁷ *Id.* (emphasis added).

24 ⁹⁸ *Id.*

25 ⁹⁹ Q4 2022 Earnings Call (Feb. 15, 2023)

26 ¹⁰⁰ Q3 2022 Earnings Cal (Nov. 8, 2023).

¹⁰¹ Q2 2024 Earnings Call (Aug. 1, 2024).

¹⁰² Roblox, *What Is Roblox*,

<http://web.archive.org/web/20170227121323/https://www.roblox.com/> (archived Feb. 27, 2017).

¹⁰³ Roblox Corp., S-1 (Securities Registration Statement) 7 (Nov. 19, 2020).

¹⁰⁴ Q2 2022 Earnings Call (Aug. 10, 2022).

101. Roblox’s executives repeatedly emphasized their strategy of “aging up” the app to attract older users. At the company’s inaugural conference with an investment bank in September 2021, Roblox’s CFO, Michael Guthrie, noted that Roblox had achieved “very good penetration of nine to twelve year-olds,” and was focused on adding users over the age of 13.¹⁰⁵ One plan was to “improve the search algorithms such that older users were finding older content,” or content tailored to their age-related demographic.¹⁰⁶

102. And at its annual Developer Conference, CEO David Baszucki encouraged developers to create experiences for older audiences, explaining that Roblox was rolling out features designed to appeal to older users, including use of real names, screen capture and sharing capabilities, video calls, and relaxed chat moderation.¹⁰⁷ These decisions, while framed as growth strategies, reflected Roblox’s willingness to compromise safety, creating new vulnerabilities and more dangerous circumstances for children in its pursuit of a more profitable, older user base.

103. Roblox executives consistently highlighted progress with the company’s “aging up” strategy on every quarterly earnings call after this until the second quarter of 2023, when CEO Baszucki declared that Roblox had achieved its goal: “We’re no longer talking about aging up. We are a platform for all ages.”¹⁰⁸ He also revealed that developers had started to “build specific 17-plus experiences.”¹⁰⁹ This progress was praised by Wall Street investment banks, who noted that aged-up experiences were a promising indicator of “potential sustainable growth tailwinds for Roblox,” reinforcing the company’s pivot toward maximizing profitability.¹¹⁰

104. Despite Roblox’s deliberate targeting of older users, it failed to implement any meaningful restrictions on contact between adult and child users or limit the mature content and

¹⁰⁵ Roblox at Goldman Sachs Communicopia Conference (Sep. 9, 2021), <https://ir.roblox.com/events-and-presentations/events/event-details/2021/Goldman-Sachs-Communicopia/default.aspx>.

¹⁰⁶ *Id.*

¹⁰⁷ Roblox Developers Conference 2023 Keynote (Sep. 8, 2023), <https://www.youtube.com/watch?v=CwLThCghzA4>.

¹⁰⁸ Q2 2023 Earnings Call (Aug. 9, 2023).

¹⁰⁹ Q2 2023 Earnings Call (Aug. 9, 2023).

¹¹⁰ Benjamin Black et al., *Bookings Back on Track*, Deutsche Bank (Nov. 4, 2024).

1 experiences it solicited from developers to attract older audiences. When asked by an equity
 2 research analyst about aged-13-and-up experiences for older users, CEO Baszucki admitted, “I
 3 want to highlight right now that *we don’t have any only 13 and up experiences*. We have 28% of
 4 the top thousand experiences having a majority of 13-plus [users] but *those are still experiences*
 5 *that are open to all ages*.”¹¹¹ Similarly, despite urging developers to build more mature experiences,
 6 Roblox continued to allow users to set up accounts without any type of age verification.¹¹² Even
 7 investors recognized the connection between older users and the increased risks for children,
 8 questioning how Roblox planned to prevent inappropriate content from reaching younger users.¹¹³

9 105. Not only did Roblox seek to increase adult users while knowing the risks that
 10 strategy posed to children, but it also sought to encourage relationships between users. At Roblox’s
 11 2023 Developers Conference, CEO Baszucki revealed Roblox’s strategy to facilitate “real-life
 12 relationships” between users—*i.e.*, dating. While he deliberately avoided the word “dating,” he
 13 then announced plans to build a product to support it: “I’m not going to use the D word but
 14 subsequent[] real-life relationships is going to happen, okay? And we’re going to build a platform
 15 to support that.”¹¹⁴

16 106. By the next year, in 2024, Baszucki explicitly acknowledged this strategy. He first
 17 acknowledged that online dating is “edgy” but then mocked his own safety team’s concerns about
 18 the dangers—“the policy and safety team told me [dating and real-life relationships] isn’t within
 19 our current policy right now”—to which the audience shared in laughter.¹¹⁵

20 107. In short, for years, Roblox has deliberately sacrificed child protection—a
 21 longstanding issue for the company—in pursuit of growth and profit. This systematic subordination
 22
 23

24
 25 ¹¹¹ Q3 2021 Earnings Call (Nov. 9, 2021) (emphasis added).

26 ¹¹² Q4 2022 Earnings Call (Feb. 15, 2023).

¹¹³ Q3 2021 Earnings Call, *supra* note 111.

¹¹⁴ Roblox Developers Conference 2023 Keynote (Sep. 8, 2023),
 27 <https://www.youtube.com/watch?v=CwLThCghzA4>.

¹¹⁵ Roblox Developers Conference 2024 Keynote (Sep. 6, 2024);
 28 <https://www.youtube.com/watch?v=HwbcWc2CwnM>.

1 of child safety to business objectives reflects Roblox’s continued choice to maximize its business
2 goals while knowingly exposing children to preventable dangers on its app.

3 **2. Roblox facilitates child sexual exploitation through the design of its app,**
4 **inadequate safety features, and refusal to invest in basic safety protections.**

5 109. Roblox’s pursuit of growth and profit over child safety is reflected in numerous
6 actions it took and decisions it made related to the design and safety of its app. Had Roblox acted
7 differently, the harm suffered by countless children would not have occurred.

8 110. Roblox designed its app so that anyone can easily communicate with children,
9 creating a virtual world where predators can freely target and groom children. Until November
10 2024, adult strangers could “friend” and chat with children of any age via direct messages and chat
11 with them in an experience through direct messages even if they were not friends. While Roblox
12 offered some adjustable parental controls for users under the age of 13, these children could bypass
13 those controls simply by creating an alternate account falsely identifying as a 13+-year-old user.
14 By designing its app this way, Roblox stripped parents of basic protective options to prevent adult
15 strangers from communicating with their children.

16 111. This practice contrasts sharply with other gaming products like Nintendo, which use
17 preprogrammed dialogue options to tightly control user interactions.¹¹⁶ By adopting a similar
18 approach, Roblox could have significantly reduced—if not eliminated—the grooming and child
19 abuse facilitated by its app because predators would not have been able to solicit any personal
20 information or send any coercive or sexually suggestive messages.

21 112. Roblox also enabled the common practice in which a predator meets and grooms a
22 child on Roblox and then transitions that child to a messaging app—often Discord. Roblox allows
23 links to Discord to be posted in game descriptions and in Roblox groups, which are user-created
24 communities on Roblox. Indeed, Roblox’s March 2022 Community Standards lists Discord as one
25 of only a handful of external apps that users were allowed to link to: “When using Roblox, you
26 may not link to any external websites or services, except for: YouTube, Facebook, Discord, Twitter,

27 _____
28 ¹¹⁶ Carville & D’Anastasio, *supra* note 8.

1 and Twitch.”¹¹⁷ Roblox could have prevented users from linking to Discord. In fact, the company
2 previously did not allow its users to link to Discord because it could not “risk unfairly exposing
3 underage users to platforms such as Discord.”¹¹⁸

4 113. Roblox also encourages users to communicate on Discord by allowing users to
5 include their Discord usernames in their Roblox profiles.¹¹⁹

6 114. This relationship created a shared ecosystem where users toggling between both
7 apps benefited both companies. Even when the inappropriate conversations and solicitation of
8 sexually explicit photos and videos occurred on Discord, Roblox profited when children were
9 coerced with Robux into sending naked and other explicit photos or videos, while Discord benefited
10 from getting more active users. Anything that keeps users engaged benefits both companies, and
11 by fostering this interconnectivity, Roblox prioritized engagement and mutual profit over the safety
12 of its users, enabling harmful behavior to flourish across both apps.

13 115. Roblox further endangered children by introducing voice calls in November 2023.
14 Called “Roblox Connect,” this virtual call feature allows users to have a conversation through their
15 avatars in real time. Concerns were immediately raised about this feature. For example, one user
16 emphasized, “This is a bad idea Roblox, and especially on your platform because this is where
17 most predators are coming from, and it makes it way easier for predators to prey on children.”¹²⁰

18 116. As Roblox contemplated and rolled out Roblox Connect, it knew that this feature
19 would drastically increase the risk to children on its app. That is because another company had
20 implemented a similar feature with disastrous consequences. Omegle was a chat website that
21 operated from 2009 to 2023. Omegle allowed users, including children, to engage in anonymous
22 chats with strangers. In March 2010, Omegle introduced a video-chat feature. Despite efforts to
23

24 ¹¹⁷ Roblox, Roblox Community Standards (May 6, 2022).

25 ¹¹⁸ Roblox, Reminder Regarding Permissible Links (Nov. 2017),
<https://devforum.roblox.com/t/reminder-regarding-permissible-links/61736>.

26 ¹¹⁹ YouTube, *How to Add Discord to Roblox Profile*, <https://www.youtube.com/watch?v=tOd-W3kdm44>.

27 ¹²⁰ Josh Taylor, *Roblox Under Fire After Adding Controversial Voice Call Feature*, Dexerto (Nov.
28 15, 2023), <https://www.dexerto.com/roblox/roblox-under-fire-after-adding-controversial-voice-call-feature-2384564/>.

1 monitor for mature and sexual content, the website became infamous for exposing minors to
2 explicit material, predators, and exploitation. Omegle’s failure to protect users led to numerous
3 incidents, including criminal cases involving child pornography. In November 2023, the same
4 month Roblox launched Roblox Connect, Omegle announced that it would cease operations. In
5 shutting down, its founder highlighted the site’s misuse: “[T]here can be no honest accounting of
6 Omegle without acknowledging that some people misused it, including to commit unspeakably
7 heinous crimes.”¹²¹ And he thanked one survivor for “opening my eyes to the human cost of
8 Omegle.”¹²² Nevertheless, Roblox introduced voice calls the same month that Omegle shut down.

9 117. Roblox also refused to implement simple measures that would have protected
10 children using its app. For example, despite having software that can verify the age and identity of
11 new accounts, Roblox instead chose to allow users to create accounts without providing their name
12 or email address—a policy that enables predators to easily create multiple anonymous accounts.

13 118. Roblox also failed to implement basic screening measures, such as utilizing the
14 biometric and age verification software it already has in its possession, before allowing users to set
15 up accounts on the app, which would ensure that known predators are not permitted on the app.

16 119. Roblox could have also required children to provide their names and email
17 addresses and obtain parental approval—a fundamental protection against predators—but refused
18 to do so. This decision allowed the company to bypass certain protections that are mandated by
19 federal law and designed to protect children. The Children’s Online Privacy Protection Act
20 (“COPPA”) prohibits companies like Roblox from collecting, using, or disclosing the personal
21 information of children under 13 without verifiable parental consent. COPPA was enacted because
22 Congress recognized the heightened vulnerability of children on the internet. As the Federal Trade
23 Commission (“FTC”) noted, children under 13 lack the capacity to “understand fully the potential
24 serious safety and privacy implications” of sharing their personal information.¹²³

26 ¹²¹ Omegle, <https://www.omegle.com/> (last visited Feb. 11, 2025).

27 ¹²² *Id.*

28 ¹²³ Federal Trade Commission, *Privacy Online: A Report to Congress* (1998),

1 120. The FTC has outlined clear and acceptable methods for obtaining verifiable parental
2 consent. These include: (a) providing a form for parents to sign and return; (b) requiring the use of
3 a credit card or online payment that notifies parents of each transaction; (c) connecting parents to
4 trained personnel via video conference; (d) offering a staffed toll-free number for parental
5 verification; (e) asking knowledge-based questions to confirm identity; or (f) verifying a parent's
6 photo-ID by comparing it to a second photo using facial recognition technology.¹²⁴

7 121. Yet instead of implementing safeguards to comply with COPPA, Roblox chose to
8 bypass these protections altogether. Roblox intentionally avoids requesting a name or email address
9 during sign-up to sidestep the requirement of verifiable parental consent. In fact, former employees
10 revealed that Roblox considered requiring verifiable consent, but ultimately resisted its
11 implementation out of fear that such requirements might drive users away.¹²⁵ Consequently,
12 creating a Roblox account is alarmingly easy, requiring less than sixty seconds and no meaningful
13 oversight—a choice that prioritizes growth over the safety of its youngest users.¹²⁶

14 122. Another easy-to-implement feature that would have improved safety is adding pop-
15 up safety notices within chats and games to warn users about their behavior or the dangerous
16 behavior of others. But Roblox executives also rejected this change.¹²⁷

17 123. Additionally, although Roblox knew that predators routinely operate dozens of
18 Roblox accounts at the same time, the company chose not to implement basic blocking of digital
19 identifiers—both the unique network addresses that track internet connections (Internet Protocol
20 or IP addresses) and the permanent hardware identification numbers assigned to devices (Media
21 Access Control or MAC addresses) that could prevent predators from creating multiple accounts.¹²⁸

22 _____
23 <https://www.ftc.gov/sites/default/files/documents/reports/privacy-online-report-congress/priv-23a.pdf>.

24 ¹²⁴ Federal Trade Commission, *Complying with COPPA: Frequently Asked Questions*, July 2020,
25 <https://www.ftc.gov/business-guidance/resources/complying-coppa-frequently-asked-questions>.

26 ¹²⁵ Hindenburg Research, *supra* note 1.

27 ¹²⁶ Scott Tong & James Perkins Mastromarino, *Roblox Attempts to Bar Child Predators as Short Sellers Target the Popular Game Platform*, WBUR (Oct. 21, 2024),
<https://www.wbur.org/hereandnow/2024/10/21/roblox-child-predators-safety>.

28 ¹²⁷ Carville & D'Anastasio, *supra* note 8.

¹²⁸ *Id.*

1 124. Similarly, Roblox chose not to require adult users to verify phone numbers—which
2 would create significant barriers to predators creating multiple accounts—despite knowing that this
3 enables bad actors to easily create numerous anonymous accounts to target children.¹²⁹

4 125. Roblox also opted not to require users to verify their age by uploading a picture of
5 either their or their parents' ID, a practice that many other applications employ. Doing so would
6 have restricted the content available to young users and prevented predators from easily
7 misrepresenting their age, which is often their approach in targeting and grooming children. As one
8 father told the press after seeing other users solicit his avatar for sex, "There is nothing to stop
9 adults going on there and pretending they're kids."¹³⁰

10 126. Roblox likewise could have created a separate, gated platform for younger children
11 that excludes adults. By utilizing the facial recognition software it already has, the company could
12 have created a space for young children to enjoy Roblox games with very few, if any, adults present.
13 Many digital service companies have adopted separate platforms for children of young ages,
14 including (for example) Amazon and Netflix.

15 127. Roblox could have placed a higher age rating on its application in the iOS App Store
16 and other app stores to signal to parents that the app presented risks for children. Roblox likewise
17 could have provided clear warnings to parents about the presence of sexual predators on the
18 platform, so that parents could make an informed decision about allowing their child on the
19 platform and/or educate their child on how to stay safe on the platform. Roblox could also have
20 provided clear warnings to children about the presence of sexual predators on the platform, and
21 instructed children on how to stay safe on the platform.

22 128. Despite these glaring failures, Roblox aggressively markets and promotes itself as
23 an "industry leader" when it comes to child safety.¹³¹ Central to this self-serving narrative is its
24

25
26 ¹³⁰ Carl Stroud, *Horried Dad Found Sick Messages from Paedo Predator in His Eight-Year Old*
27 *Son's Roblox iPad Game*, The Sun (Feb. 15, 2017),
<https://www.thesun.co.uk/news/2872376/horried-dad-found-sick-messages-from-paedo-predator-in-his-eight-year-old-sons-roblox-ipad-game/>.

28 ¹³¹ Q1 2021 Earnings Call (May 11, 2021).

1 “accomplishments” of investing in artificial intelligence (“AI”) and machine learning systems
 2 supposedly designed to scan and monitor all communications on the app and prevent the sharing
 3 of inappropriate content and personally identifiable information.¹³²

4 129. Yet this technology has proven grossly inadequate and insufficient to protect
 5 children. For example, Roblox’s filters have inexplicable omissions. While Roblox blocks certain
 6 words, like “Snap” and “Snapchat,” to supposedly prevent off-app communications, it allows
 7 workarounds such as the use of the ghost emoji (👻), which is widely recognized as a symbol for
 8 Snapchat, or alternative spellings, like “Snappy” or “apchat.” Similarly, while the word “Discord”
 9 is blocked, users can bypass this filter by using the disc emoji (🍷) or typing variations, like
 10 “iscord” or “cord.”¹³³ That Roblox selectively blocks the words “Snap,” “Snapchat,” and “Discord”
 11 reveals that Roblox is fully aware of the dangers of off-app inappropriate communications yet
 12 chooses not to close these loopholes. And while Roblox prevents users from sharing phone numbers
 13 in numerical format, it does nothing to stop users from spelling out the numbers.¹³⁴

14 130. Similarly, while Roblox attempts to block the word “condo,” countless external
 15 groups on platforms like Reddit and Discord are dedicated to helping users locate new explicit
 16 content on Roblox. As soon as Roblox removes one game, its ineffective safeguards allow the same
 17 game to be reuploaded almost immediately from a new account, perpetuating the cycle of explicit
 18 and harmful content. External groups have capitalized on Roblox’s weak moderation by guiding
 19 predators to these reuploaded games, with Fast Company easily identifying 150 Discord groups
 20 dedicated to exploiting Roblox’s lack of robust enforcement.¹³⁵

23 ¹³² Roblox, *Safety Features: Chat, Privacy & Filtering*,
 24 [https://web.archive.org/web/20240714130904/https://en.help.roblox.com/hc/en-](https://web.archive.org/web/20240714130904/https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering)
 25 [us/articles/203313120-Safety-Features-Chat-Privacy-Filtering](https://web.archive.org/web/20240714130904/https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering) (archived Jul. 14, 2024).

26 ¹³³ Edwin Dorsey, *Problems at Roblox (RBLX) #5*, The Bear Cave (Oct. 17, 2024),
<https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

27 ¹³⁴ *Id.*

28 ¹³⁵ Burt Helm, Sex, Lies and Video Games: *Inside Roblox’s War on Porn*, Fast Company (Aug. 19, 2020), <https://www.fastcompany.com/90539906/sex-lies-and-video-games-inside-roblox-war-on-porn>.

131. Beyond Roblox’s ineffective technology, the company also employs a woefully inadequate number of human moderators to analyze and manage content on its platform. With only about 3,000 moderators, Roblox pales in comparison to platforms like TikTok, which, despite having only three times the number of users, employs more than ten times the number of moderators at 40,000.¹³⁶ Roblox attempts to justify this disparity by claiming “[y]ou really can’t judge the quality of these moderation systems by the number of people.”¹³⁷ But the reality tells a different story. Roblox’s moderators, many of them overseas contractors, report being overwhelmed by an unmanageable volume of child safety reports, making it impossible to address all concerns effectively and leaving countless safety issues unresolved.¹³⁸

132. Even the safety data that Roblox touts is flawed and only underscores the growing dangers created by the company’s app. For example, Roblox proudly points to its low percentage of reports to the National Center for Missing and Exploited Children (“NCMEC”)—the leading U.S. nonprofit organization tasked with preventing child exploitation and assisting in the recovery of missing children. Roblox claims that it accounts for less than .04% of reports made to NCMEC.¹³⁹ But this data is entirely self-reported and therefore depends on Roblox’s ineffective content moderation and safety team. This self-reported data to NCMEC—flawed and limited as it is—also reveals a disturbing trend: Roblox’s reports about suspected child sexual exploitation have surged over the years, from 675 reports in 2019 to 13,316 reports in 2023.¹⁴⁰

¹³⁶ Carville & D’Anastasio, *supra* note 8.

¹³⁷ Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety Features, Past Cases of Child Abuse on the Platform*, WBUR (Nov. 18, 2024), <https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features>.

¹³⁸ Carville & D’Anastasio, *supra* note 8.

¹³⁹ Scott Tong & James Perkins Mastromarino, *Roblox Attempts to Bar Child Predators as Short Sellers Target the Popular Game Platform*, WBUR (Oct. 21, 2024), <https://www.wbur.org/hereandnow/2024/10/21/roblox-child-predators-safety>.

¹⁴⁰ National Center for Missing & Exploited Children, *2019 CyberTipline Reports by Electronic Services Providers (ESP)*, <https://www.missingkids.org/content/dam/missingkids/pdfs/2019-reports-by-esp.pdf>; *see also* National Center for Missing & Exploited Children, *2023 CyberTipline Reports by Electronic Services Providers (ESP)*, <https://www.missingkids.org/content/dam/missingkids/pdfs/2023-reports-by-esp.pdf>.

1 133. Roblox also boasts that just “0.0063% of [its] total content was flagged for
2 violating” policies. But Roblox itself controls the systems responsible for identifying and flagging
3 violative content.¹⁴¹ These lower percentages are thus a reflection not of safety but of Roblox’s
4 ability to minimize the appearance of problems through its own inadequate reporting and
5 enforcement mechanisms. By hiding behind self-serving metrics and refusing to take meaningful
6 action, Roblox has fostered an environment where children are subjected to irreparable harm while
7 the company continues to reap financial rewards.

8 134. The very existence of Roblox’s trust and safety “data” on inappropriate
9 communications to train its AI systems contradicts its claim that “one is too many” when it comes
10 to the sexual exploitation of children. This data exists only because countless instances of abuse,
11 exploitation, and predatory interactions have already occurred. Roblox’s reliance on this data to
12 train its AI systems exposes the reality that its so-called safety measures are not designed to prevent
13 these atrocities but to react to them after the damage has been done. Instead of creating a secure
14 environment where such harm never occurs and ensuring that such interactions never happen in the
15 first place, Roblox uses the suffering and trauma of children as the foundation for its trust and safety
16 systems. This cycle underscores the company’s prioritization of optics over genuine protection,
17 leaving its youngest users at the mercy of its neglect.

18 135. Roblox’s own developers even admit that Roblox is unsafe for children.¹⁴² Online
19 forum discussion posts are replete with developers writing that they would not allow their own
20 children to use the platform, citing pervasive issues with Roblox’s child safety policies. Many of
21 these posts highlight the platform’s systemic failures and suggest straightforward changes Roblox
22 could implement to create a safer environment but has consistently ignored—for example:

25 ¹⁴¹ Vikki Blake, *Roblox Reported Over 13,000 Incidents to the National Center for Missing and*
26 *Exploited Children in 2023*, GamesIndustry.biz (Jul. 23, 2024),
27 <https://www.gamesindustry.biz/roblox-reported-over-13000-incidents-to-the-national-center-for-missing-and-exploited-children-in-2023>.

28 ¹⁴² Edwin Dorsey, *Problems at Roblox (RBLX) #5*, The Bear Cave (Oct. 17, 2024),
<https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

- a. “Unfortunately, it is worse now due to Roblox’s moderation being so abysmal and Roblox being a far more widespread platform. Creeps flock aplenty when before the creep: kid ratio was much much lower . . . Roblox has no interest in actually fixing the issues so long as the bad press doesn’t end up viral.”¹⁴³
- b. “No. Roblox is not safe for children. The amount of NSFW [Not Safe for Work] I see on this platform on a daily basis is unbelievable. I’m surprised COPPA hasn’t taken any action.”¹⁴⁴
- c. “I believe they need to automatically rate these games for older audiences, if not, you know, removing them entirely. I could keep going on about this issue, but it’s just beating a dead horse at this point.”¹⁴⁵
- d. “Roblox got banned for bad moderation; Turkey banned it to ‘protect children,’ and they are not wrong. The amount of visits from 10 of these games is, in summary, 100 million+. I don’t want to know how many of these children have seen nudity or even developed a p*rn addiction. But that is a big problem with Roblox doing almost nothing to prevent it.”¹⁴⁶

136. These statements, coming from individuals familiar with Roblox’s operations, paint a picture of an environment rife with neglect, where harmful content flourishes, predators thrive, and Roblox repeatedly fails to act—even in the face of widespread and urgent warnings.

3. Roblox’s recent safety changes are woefully inadequate and fail to address years of neglect and harm caused by its app.

137. After years of mounting pressure, Roblox recently announced changes to its child safety features. These changes were prompted not by the years of police reports and widespread media coverage but by a scathing report published by a well-known short seller accusing the

¹⁴³ *Id.*

¹⁴⁴ *Id.*

¹⁴⁵ *Id.*

¹⁴⁶ *Id.*

1 platform of being a “pedophile hellscape for kids.”¹⁴⁷ Released on October 8, 2024, the report
 2 sparked public outrage, detailing many of the issues described above that Roblox had long ignored.

3 138. A little more than a month later, Roblox announced a series of changes, including
 4 permanently removing the ability to message others outside of games on its app for under 13-year-
 5 old users;¹⁴⁸ giving parents a separate dashboard where they can monitor a child’s Roblox account,
 6 view the child’s friend list, set spending control, and manage screen time;¹⁴⁹ preventing games from
 7 using chalkboard writings where people could get around the censoring of communications;¹⁵⁰ and
 8 implementing restrictions to stop under 13-year-old users from accessing new Roblox games that
 9 are awaiting maturity ratings.¹⁵¹

10 139. These changes could all have been implemented years ago. None of them involve
 11 any new or groundbreaking technology. Roblox only moved forward when its stock was threatened.

12 140. And these changes are little more than window dressing—too little, too late, and
 13 woefully inadequate. Most fundamentally, Roblox *still allows* adults to contact and message
 14 children. Roblox only banned user-to-user messaging for users under the age of 13 *outside of*
 15 *games*. Predators can still message children on public chats while playing games; indeed, Roblox
 16 has left child predators’ blueprint for finding children on the application intact since predators have
 17 always found children by playing games they know that children will frequent.

18 141. Roblox also failed to address core issues like the app’s lack of age verification and
 19 refusal to require parental consent to make an account. The restrictions described above work only
 20 if children correctly state their age during sign-up. Any child can easily bypass them—including
 21 parental controls and limits on messaging—by lying about their birthday. Roblox likewise did not

22 _____
 23 ¹⁴⁷ Hindenburg Research, *supra* note 1.

24 ¹⁴⁸ *Roblox Tightens Messaging Rules for Under-13 Users Amid Abuse Concerns*, Reuters (Nov.
 25 18, 2024), [https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-](https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/)
 26 [amid-abuse-concerns-2024-11-18/](https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/).

27 ¹⁴⁹ Robert Booth, *Roblox to Give Parents More Control Over Children’s Activity After Warnings*
 28 *Over Grooming*, The Guardian, (Nov. 18, 2024),
[https://www.theguardian.com/technology/2024/nov/18/roblox-to-hand-parents-more-control-over-](https://www.theguardian.com/technology/2024/nov/18/roblox-to-hand-parents-more-control-over-their-childrens-activity)
[their-childrens-activity](https://www.theguardian.com/technology/2024/nov/18/roblox-to-hand-parents-more-control-over-their-childrens-activity).

¹⁵⁰ *Id.*

¹⁵¹ *Id.*

1 commit to hiring more moderators or increasing its trust and safety budget, nor did it implement
2 any sort of identity check to prevent registered sex offenders from making accounts.

3 142. In fact, recently, in April 2025, a research firm in the U.K. demonstrated just how
4 easy it still is for predators to find children and move the conversation to another application, such
5 as Snapchat or Discord, despite Roblox's ban on direct messaging with users under the age of 13.¹⁵²
6 Because Roblox still allows adult users to message children *in games*, predators can use the public
7 chat functions in games to groom child users and ask for their usernames on other platforms. And,
8 for chat within games, Roblox's default settings for children under the age of 13 is to allow
9 "everyone" to chat with these children, seamlessly facilitating predators' access to children.¹⁵³ The
10 key findings from this report included that "[a]dults and children can chat with no obvious
11 supervision" and that "[t]he safety controls that exist are limited in their effectiveness and there are
12 still significant risks for children on the platform."¹⁵⁴



21 *In April 2025, a research agency demonstrated how easy it was for a 42-year-old account to find*
22 *a five-year-old user on Roblox and get the child to move the conversation to Snapchat.*¹⁵⁵

25 ¹⁵² Revealing Reality, *A Digital Playground: The Real Guide to Roblox* (Apr. 13, 2025),
26 <https://think.revealingreality.co.uk/roblox-real-guide>.

27 ¹⁵³ Parental Controls Overview, Roblox, [https://en.help.roblox.com/hc/en-](https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview)
28 [us/articles/30428310121620-Parental-Controls-Overview](https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview) (last accessed May 10, 2025).

¹⁵⁴ Revealing Reality, *supra* note 152.

¹⁵⁵ *Id.*

1 143. Just as Roblox rolled out these changes, it simultaneously introduced a new
2 “Parties” feature in an attempt to counteract any potential loss in user engagement.¹⁵⁶ Because
3 Roblox knew that users often turned to other apps like Discord to communicate while playing video
4 games and because Roblox knew that its safety changes would reduce key user engagement
5 metrics, it sought to capture that traffic (and revenue) and replace any loss of engagement with the
6 Parties feature. While the Parties feature is currently available only for users aged 13 and older,
7 such limitations are hollow without robust age verification. And the fact that Roblox has stated that
8 it is exploring making such a feature available to younger users demonstrates that, far from
9 prioritizing safety, Roblox’s real focus is protecting its bottom-line.¹⁵⁷

10 144. Roblox has also engaged in a deceptive public relations campaign using ostensibly
11 independent online safety organizations to influence the narrative around these changes. For
12 instance, Roblox has leveraged its ties to groups like the Family Online Safety Institute (“FOSI”).
13 An online parenting magazine favorably quoted Stephen Balkam, FOSI’s CEO, as endorsing
14 Roblox’s new features as a win for child safety.¹⁵⁸ What the article omitted, however, is that
15 Roblox’s own Vice President of Civility and Partnerships, Tami Bhaumik, serves as FOSI’s board
16 chair—an obvious conflict of interest.¹⁵⁹ This calculated relationship exposes how Roblox
17 manipulates public perception by using seemingly independent safety organizations as
18 mouthpieces to shape the narrative in its favor.

24
25 ¹⁵⁶ Rebecca Ruiz, *Roblox’s New Party Feature Makes Discord Obsolete*, Mashable (Dec. 2, 2024),
<https://mashable.com/article/roblox-party-discord>.

26 ¹⁵⁷ *Id.*

27 ¹⁵⁸ Anna Halkidis, *What Roblox’s Latest Changes Mean for Your Kids’ Online Safety*, Parents
(Nov. 18, 2024), <https://www.parents.com/roblox-new-parental-controls-8747405>.

28 ¹⁵⁹ *FOSI Welcomes Roblox Vice President as New Board Chair*, FOSI (Oct. 12, 2022),
<https://www.fosi.org/about-press/fosi-welcomes-roblox-vice-president-as-new-board-chair>.



Stephen Balkam's LinkedIn post revealing his connection to Roblox in a post praising Roblox's changes.¹⁶⁰

145. Most recently, in April 2025, Roblox repeated this same deceptive playbook of bragging about new safety features that, in reality, are glaringly deficient. This update included three new features: first, allowing parents to block children from playing specific games; second, granting parents the power to block people on their child's friends list; and third, giving parents visibility into the games that their child spends the most time in.¹⁶¹

146. None of these parental controls address the underlying deficiency with Roblox that facilitates grooming and predation on children—adult access to and communication with children. Without allowing parents to see who their child is messaging and what the messages say, parents lack the information necessary to determine which accounts to block on their child's friend list. A

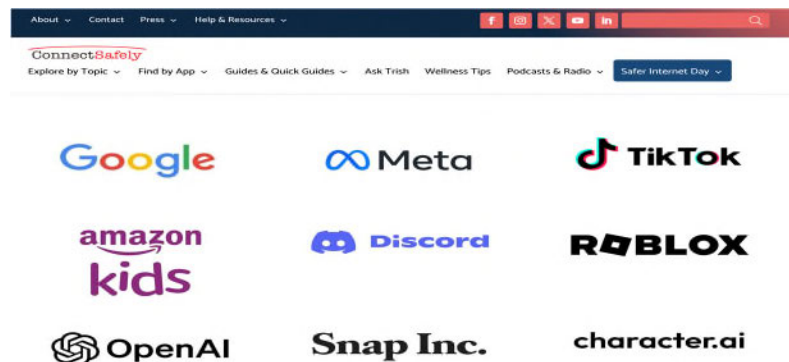
¹⁶⁰ LinkedIn, Stephen Balkam's Post, https://www.linkedin.com/posts/stephenbalkam_what-roblox-latest-changes-mean-for-your-activity-7264409332950220801-WCDF (last visited Jan. 6, 2025).

¹⁶¹ Matt Kaufman, *New Tools for Parents to Personalize Their Child's Experience on Roblox*, ROBLOX (Apr. 2, 2025), <https://corp.roblox.com/newsroom/2025/04/new-parental-controls-on-roblox>.

list of the top twenty games that a child plays does not tell a parent which games children are interacting with adults in. Moreover, blocking specific games is ineffective when, as discussed above, inappropriate games are re-posted as soon as they are taken down. Indeed, barely a week later, the U.K. research firm discussed above demonstrated just how easy it is for adults to continue to find children, groom them, and then move the communications off Roblox, even after Roblox announced these safety updates.¹⁶²

147. And, yet again, all of these controls could have been introduced *years ago*, as none are facilitated by previously unavailable technology.

148. Roblox’s deceptive playbook would not be complete without a misleading public relations campaign, where industry-funded safety “experts” praise Roblox’s safety update. For example, Roblox’s press release announcing these updates quotes Larry Magid, the CEO of ConnectSafely, as saying, “Roblox has consistently provided parents with tools that enable their children to enjoy the platform, while helping protect them against online risks. These new friend- and experience-blocking tools provide parents with even more ways to help ensure their children are using it safely. Safety, fun, and adventure are not mutually exclusive.”¹⁶³ What the press release did not say is that ConnectSafely—a non-profit ostensibly focused on educating people about internet safety—is funded by tech companies and lists Roblox as one of its “supporters.”¹⁶⁴



ConnectSafely’s list of supporters on its website.

¹⁶² *A Digital Playground: The Real Guide to Roblox.*

¹⁶³ Matt Kaufman, *New Tools for Parents to Personalize Their Child’s Experience on Roblox.*

¹⁶⁴ ConnectSafely, *Supporters*, <https://connectsafely.org/about-us/supporters/> (last accessed May 10, 2025).

149. A few weeks later, Magid was quoted again in praise of Roblox, this time in a *Newsweek* article championing Roblox as a “trusted playground” for kids: “I would put them very high up on the list of companies that seem to care. They actually have a vice president of civility. It’s unheard of to have somebody at that level of the company that focuses on civility. They really work very hard to make it a friendly, comfortable, civil environment for young people.”¹⁶⁵ Again, this article made no mention of Magid’s organization’s financial ties to Roblox.

150. FOSI CEO Stephen Balkam was also quoted in the *Newsweek* piece, claiming that Roblox was “top-of-class” for its safety features and even repeating Roblox’s own party line that safety is “part of [Roblox’s] DNA.”¹⁶⁶ Again, this article omitted FOSI’s ties to Roblox, financial and otherwise, thereby deceptively pushing a narrative of Roblox as a “safe” application for kids.

V. FACTUAL ALLEGATIONS AS TO DISCORD

A. Discord Offers a Communications App That It Markets to Children.

151. Discord is a communications app that allows users to chat over voice, video, and text messaging. Discord is organized into chat groups called “servers,” which are topic-based virtual spaces that users can join to engage in conversations with others. Servers are organized into subtopics called “channels,” which are divided into text and voice channels. In text channels, users post messages, upload files, and share images. In voice channels, users communicate through voice or video chat and screen share. Users can also send private messages via voice, video, or text.

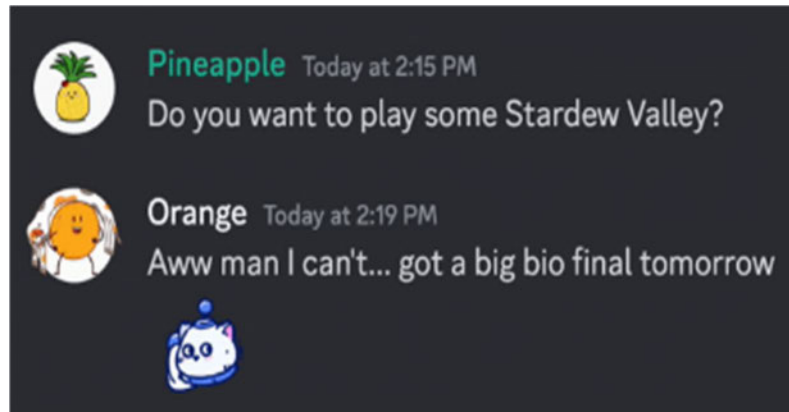
152. Launched in 2015, Discord quickly became the top app for gamers looking to communicate while playing videogames. The company’s founders shared a love of video games and created a service for gamers to seamlessly communicate with each other. Discord has since expanded to include a wider audience of anyone looking to communicate with others about an

¹⁶⁵ Katherine Fung, *How Roblox Became a Trusted Playground for Millions of Kids*, *Newsweek* (Apr. 23, 2025), <https://www.newsweek.com/how-roblox-became-trusted-playground-millions-kids-2057601>.

¹⁶⁶ *Id.*

1 endless array of topics. As Discord puts it, “Discord is now where the world talks, hangs out, and
2 builds relationships”—“Discord lets anyone create a space to find belonging.”¹⁶⁷

3 153. Although many users on Discord are adults, Discord directly markets its app to
4 young users. For example, Discord advertises its functionality for school clubs and offers “Student
5 Hubs,” which are “dedicated places for students on Discord that make it easy to meet classmates
6 from your own school, discover their communities on Discord, and share your servers for your
7 fellow classmates to join.”¹⁶⁸ Discord also markets to young users with features such as “custom
8 emoji, stickers, soundboard effects and more to add your personality to your voice, video or text
9 chat.”¹⁶⁹ According to Discord, these features are designed to “make your group chats more fun.”¹⁷⁰



17 *Example of a custom emoji from Discord’s website.*¹⁷¹

18 154. In recent years, Discord has exploded in popularity among young users, driven in
19 part by the pandemic. As The New York Times explained in its article *How Discord, Born from an*
20 *Obscure Game, Became a Social Hub for Young People*, “While adults working from home flocked
21 to Zoom, their children were downloading Discord to socialize with other young people through
22

23
24 ¹⁶⁷ Discord, *Create Space for Everyone to Find Belonging*, <https://discord.com/company> (last visited Feb. 11, 2025).

25 ¹⁶⁸ Discord, *Discover Your Next Favorite Campus Club in Student Hubs* (Aug. 22, 2022),
<https://discord.com/blog/discover-your-next-favorite-campus-club-in-student-hubs>.

26 ¹⁶⁹ Discord, *Create Space for Everyone to Find Belonging*, <https://discord.com/company> (last visited Feb. 11, 2025).

27 ¹⁷⁰ *Id.*

28 ¹⁷¹ Discord, *Custom Emojis*, https://support.discord.com/hc/en-us/articles/360036479811-Custom-Emojis#h_01H06JVDAV2VKZBTRGJDY8NBV7 (last visited Feb. 11, 2025).

1 text and audio and video calls in groups known as servers.”¹⁷² Given this influx of young people,
 2 which has only grown since the pandemic, the average age of a Discord user is 16 years old.¹⁷³

3 155. Creating an account on Discord is extremely easy. Users must provide only an email
 4 address, display name, username, password, and birthdate. Users can then access Discord for free
 5 on their computers, tablets, and cellular devices.

The image shows the Discord account creation interface. At the top, it says 'Create an account'. Below this are four input fields: 'EMAIL', 'DISPLAY NAME', 'USERNAME', and 'PASSWORD', each followed by a red asterisk. Below these is a 'DATE OF BIRTH' section with three dropdown menus labeled 'Month', 'Day', and 'Year'. A large blue button labeled 'Continue' is positioned below the date fields. Under the button, there is a line of text: 'By registering, you agree to Discord's Terms of Service and Privacy Policy.' and a link that says 'Already have an account?'.

19 *Discord Sign-up Screen*

20 156. While Discord’s Terms of Service prohibit users under 13, Discord does not verify
 21 age or identity. As a result, countless Discord users are under 13, many of whom state their real
 22

26 ¹⁷² Kellen Browning, *How Discord, Born from an Obscure Game, Became a Social Hub for Young People*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

28 ¹⁷³ Super League, *An Introductory Look into Discord*, <https://www.superleague.com/post/an-introductory-look-into-discord>.

age in their bios, tell other users their real age in chats, and post pictures showing their real age. There are children as young as eight years old using Discord.¹⁷⁴

157. Although Discord offers certain safety features, Discord does not default to the highest safety settings upon account creation. For example, by default, all users, including those under 18, can receive direct messages from another user in the same server, allowing them to send and receive private messages from strangers. And even when parents set more restrictive settings, children can simply change those settings to whatever they desire.

158. Certain content on Discord is “age-restricted,” meaning in theory that children under 18 cannot access it. Server owners can self-designate specific channels in a server as age-restricted. For years, however, Discord did not allow server owners to self-designate entire servers as age-restricted, and so minors could easily access servers with age-restricted content even if designated age-restricted channels in the server were blocked. Discord only recently provided server owners with the ability to self-designate entire servers as age-restricted.

B. Discord Lures Parents into Letting Their Kids Use Discord with Promises of Safety.

159. Since its inception, Discord has assured parents that its app provides a safe place for children to spend their time interacting with others. According to Discord, “in May 2015, Discord began as a way for us to all play games together, better. And Safer.”¹⁷⁵ “We’ve always wanted Discord to be a place where one could safely play games with friends.”¹⁷⁶

160. For years, Discord has promised that it has a “zero-tolerance policy” for anything relating to the sexual exploitation of children. For example, in Discord’s July – September 2022 Transparency Report, Discord emphasized that it “has a zero-tolerance policy for anyone who endangers or sexualizes children.”¹⁷⁷ Similarly, in a July 2023 website post titled “Discord’s

¹⁷⁴ Kellen Browning, *5 Ways Young People Are Using Discord*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-users-gen-z.html>.

¹⁷⁵ Discord, *Discord Safety Boost* (Mar. 28, 2017), <https://discord.com/blog/discord-safety-boost>.

¹⁷⁶ *Id.*

¹⁷⁷ Discord, *Discord Transparency Report: July – September 2022*, <https://discord.com/blog/discord-transparency-report-q3-2022>.

1 Commitment to Teen and Child Safety,” Discord assured parents that it “has a zero-tolerance policy
 2 for inappropriate sexual conduct with children and grooming,” with “special attention given to
 3 predatory behaviors such as online enticement and the sexual extortion of children.”¹⁷⁸

4 161. Discord promises parents that its app is different from other communication
 5 products when it comes to child safety, assuring parents that “[w]e built Discord to be different and
 6 work relentlessly to make it a fun and space for teens.”¹⁷⁹ “Discord is built on Safety,” and “[s]afety
 7 is at the core of everything we do and a primary area of investment as a business.”¹⁸⁰

8 162. Discord specifically assures parents that its app is designed to keep children safe
 9 and that it defaults to safety. Discord, for instance, in a website post titled “Settling into School
 10 with Discord,” informs parents that “[m]any teams across Discord work together to ensure that
 11 your teen finds belonging by building products and policies with safety by default.”¹⁸¹ And in a
 12 website post titled “Discord’s Commitment to Teen and Child Safety,” Discord promises parents
 13 that “[w]e make our products safe spaces by design and default. Safety is and will remain part of
 14 Discord’s core experience.”¹⁸²

15 163. Likewise, according to Discord’s 2023 “Parent’s Guide to Discord,” “Discord has
 16 default settings designed to keep minors safe, such as automatically scanning direct messages for
 17 explicit images and videos.”¹⁸³ Those default settings, according to Discord, include “Teen Safety
 18 Assist,” which (1) “automatically blur[s] media that may be sensitive in direct messages and group
 19

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 21 ¹⁷⁸ Discord, *Discord’s Commitment to Teen and Child Safety* (July 11, 2023),
<https://discord.com/safety/commitment-to-teen-child-safety>.

22 ¹⁷⁹ *Id.*

23 ¹⁸⁰ Discord, *Discord’s Commitment to a Safe and Trusted Experience* (May 12, 2022),
<https://discord.com/safety/360043700632-discords-commitment-to-a-safe-and-trusted-experience>;
<https://discord.com/safety/commitment-to-teen-child-safety>.

24 ¹⁸¹ Savannah Badalich, *Settling into School with Discord*, Discord (Sept. 28, 2021),
<https://discord.com/safety/settling-into-school-with-discord>.

25 ¹⁸² Discord, *Discord’s Commitment to a Safe and Trusted Experience* (May 12, 2022),
<https://discord.com/safety/360043700632-discords-commitment-to-a-safe-and-trusted-experience>;
<https://discord.com/safety/commitment-to-teen-child-safety>.

26 ¹⁸³ Discord, *Parent’s Guide to Discord*,
 27 [https://web.archive.org/web/20230714165101/https://connectsafely.org/wp-](https://web.archive.org/web/20230714165101/https://connectsafely.org/wp-content/uploads/2021/09/Parents-Guide-to-Discord.pdf)
 28 [content/uploads/2021/09/Parents-Guide-to-Discord.pdf](https://web.archive.org/web/20230714165101/https://connectsafely.org/wp-content/uploads/2021/09/Parents-Guide-to-Discord.pdf) (archived July 14, 2023).

1 direct messages with friends, as well as in servers,” and (2) sends “safety alerts” to teen users when
 2 they receive a direct message from a user for the first time.”¹⁸⁴

3 164. While Discord represents that its app is designed to default to safety, it
 4 simultaneously instructs parents on how to *change* the default safety settings to keep their child
 5 safe. For years, Discord has consistently assured parents that they can use the company’s “tools to
 6 protect [their children] from inappropriate content or unwanted contact.”¹⁸⁵ Discord, for example,
 7 tells parents they can turn on an “explicit image filter” that will “[a]utomatically block direct
 8 messages that may contain explicit images.”¹⁸⁶ Discord also informs parents that they can disable
 9 the direct message setting that allows anyone in a server to privately message their children.
 10 Discord also promises parents that they can change their child’s “Friend request settings” to limit
 11 who can send them a friend request—*i.e.*, “Everyone,” Friend of friends,” or “Server members.”¹⁸⁷

12 165. Discord’s CEO and co-founder Jason Citron recently reiterated many these
 13 assurances nearly verbatim in his January 31, 2024 testimony to the U.S. Senate as part of its
 14 hearing on “Big Tech and the Online Child Sexual Exploitation Crisis.” Citron began his written
 15 testimony “by stating clearly that Discord has a zero-tolerance policy for content or conduct that
 16 endangers or sexualizes children.”¹⁸⁸ Discord, according to Citron, “has a zero-tolerance policy for
 17 inappropriate sexual conduct with children, meaning inappropriate sexual contact between adults
 18
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 21 ¹⁸⁴ Savannah Badalich, *Building a Safer Place for Teens to Hang Out*, Discord (Oct. 24, 2023),
<https://discord.com/safety/safer-place-for-teens>.

22 ¹⁸⁵ Discord, *Helping Your Teen Stay Safe on Discord* (May 12, 2022),
<https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord>; Discord,
 23 *Helping Your Teen Stay Safe on Discord*,
[https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord)
 24 [your-teen-stay-safe-on-discord](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord) (archived July 11, 2023).

25 ¹⁸⁶ Discord, *Helping Your Teen Stay Safe on Discord*,
[https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord)
 26 [your-teen-stay-safe-on-discord](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord) (archived July 11, 2023).

¹⁸⁷ *Id.*

27 ¹⁸⁸ Hearing Before the U.S. Senate Committee on the Judiciary, Big Tech and the Online Child
 28 Exploitation Crisis, Testimony of Jason Citron, CEO and Co-Founder of Discord Inc. (Jan. 31,
 2024), https://www.judiciary.senate.gov/imo/media/doc/2024-01-31_-_testimony_-_citron.pdf.

1 and teens on the service, with special attention given to predatory behaviors such as online
2 enticement and the sexual extortion of children, commonly referred to as ‘sextortion.’”¹⁸⁹

3 166. He also emphasized Discord’s “multi-pronged approach” to child safety, including
4 the company’s “approach to product development, whereby we implement a rigorous ‘safety by
5 design’ practice when developing products.”¹⁹⁰ As Citron elaborated, “[b]ecause safety is critical
6 to our core mission, Discord takes a ‘safety by design’ approach to our work.”¹⁹¹

7 167. Citron also highlighted Discord’s “sophisticated tools” for parents to keep their
8 children safe, as well as the company’s “features designed to keep teens safe on our platform,” such
9 as Teen Safety Assist, which flags “potentially unwanted conversations to teen users in Discord”
10 and “automatically blur[s] potentially sensitive media to teens in DMs, GMS, and in servers.”¹⁹²

11 **C. In Reality, Discord Is a Digital and Real-life Nightmare for Children.**

12 168. Although Discord assures parents that it has zero tolerance for content or conduct
13 that endangers children and that its app is built on safety, the company, in fact, has created and
14 maintains an environment in which the sexual exploitation of children is rampant and thriving. The
15 result has been devastating, with countless children suffering irreversible harm.

16 **1. Discord hosts and promotes dangerous and illegal sexual content.**

17 169. Discord is overflowing with sexually explicit images and videos involving children,
18 including anime and child sex abuse material (“CSAM”)—*i.e.*, child pornography. Discord
19 provides access to these materials not only to adults but also to child users, creating an ecosystem
20 that facilitates pedophilia and exposes children to this unlawful content.

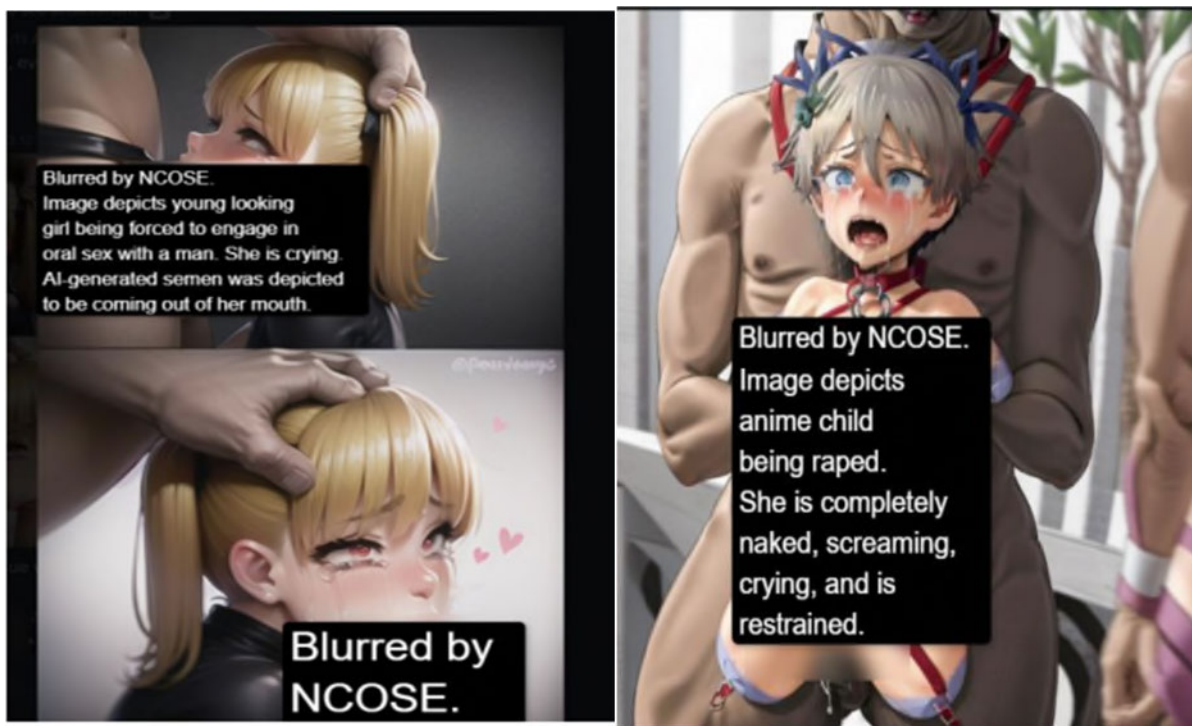
21 170. The content of this material is beyond disturbing. For example, numerous Discord
22 servers contain anime images of children being brutally assaulted and raped by male adults.

26 ¹⁸⁹ *Id.*

27 ¹⁹⁰ *Id.*

28 ¹⁹¹ *Id.*

¹⁹² *Id.*



*Examples of images obtained on Discord servers by the National Center on Sexual Exploitation.*¹⁹³

171. Discord is also permeated with actual child pornography, or CSAM, hosting hundreds if not thousands of servers dedicated to trading and sharing CSAM. For example, in a June 2023 article, NBC News reported that “[i]n a review of publicly listed Discord servers created in the last month,” it “identified 242 that appeared to market sexually explicit content of minors, using thinly veiled terms like ‘CP’ that refer to child sexual abuse material.”¹⁹⁴

172. Predators themselves even admit that Discord is a go-to app for them for finding and sharing CSAM. In February 2024, a nonprofit called Protect Children released a report, “Tech Platforms Used by Online Child Sexual Abuse Offenders,” which contained survey data from anonymous individuals searching for CSAM on the dark web. That survey revealed that Discord is

¹⁹³ National Center on Sexual Exploitation, Compilation of Proof, https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-2023DDL_Discord.pdf.

¹⁹⁴ Ben Goggin, *Child Predators Are Using Discord, a Popular App Among Teens, for Sextortion and Abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769>.

1 one of their “top platforms” for searching for, viewing, or sharing CSAM.¹⁹⁵ Based on the results
2 of this survey, the report found an “unmistakable overlap” between “the platforms most used for
3 viewing and sharing CSAM and the platforms most popular among children and young people.”¹⁹⁶

4 173. Through numerous well-documented and publicized cases, Discord has long been
5 aware of the proliferation of CSAM and similar material that its app enables and facilitates,
6 including because in some of these cases, Discord reported the material to the National Center for
7 Missing and Exploited Children, which then reported the material to the authorities.

8 174. From its beginning, Discord has been at the center of numerous criminal cases
9 involving CSAM. According to court documents from a federal case involving a vast CSAM
10 enterprise and conspiracy, between 2016 and 2018, ten men “utilized chatrooms on the online
11 service ‘Discord’—an application designed for online gaming communities that allows users to
12 engage in text chat and share images and videos—to produce and exchange child pornography.”¹⁹⁷
13 They pled guilty and were sentenced to long prison terms. Similarly, according to court documents
14 in another case, between 2019 and 2020, a North Carolina man was able to use Discord to chat
15 about and trade CSAM.¹⁹⁸ He pled guilty and was sentenced to 240 months in federal prison.

16 175. Similar incidents occurred throughout 2021 and 2022. In 2021, for example, federal
17 authorities arrested an Idaho man after locating numerous files of CSAM that he had uploaded to
18 his Discord account.¹⁹⁹ And in 2022, a Louisiana man pled guilty to possessing CSAM, admitting
19 that “he created a Discord account,” that “other Discord users would share CSAM on the website,”
20

21 ¹⁹⁵ Protect Children, *Tech Platforms Used By Online Child Sexual Abuse Offenders* (Feb. 2024),
22 https://bd9606b6-40f8-4128-b03a-9282bdcfff0f.usrfiles.com/ugd/bd9606_0d8ae7365a8f4bfc977d8e7aeb2a1e1a.pdf.

23 ¹⁹⁶ *Id.*

24 ¹⁹⁷ U.S. Dep’t of Justice, *Ten Men Sentenced to Prison for Their Roles in a Child Exploitation Enterprise and Conspiracy* (Oct. 1, 2020), <https://www.justice.gov/opa/pr/ten-men-sentenced-prison-their-roles-child-exploitation-enterprise-and-conspiracy>.

25 ¹⁹⁸ U.S. Dep’t of Justice, *Man in Possession of Child Sexual Abuse Material Is Sentence to 20 Years in Prison* (Feb. 17, 2023), <https://www.justice.gov/usao-wdnc/pr/man-possession-child-sexual-abuse-material-sentenced-20-years-prison>.

26 ¹⁹⁹ U.S. Dep’t of Justice, *Nampa Man Sentenced to 6 Years in Federal Prison Possessing Child Pornography* (Dec. 12, 2023), <https://www.justice.gov/usao-id/pr/nampa-man-sentenced-6-years-federal-prison-possessing-child-pornography>.
27
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1 and that he would “upload the saved CSAM from his phone to other Discord users.”²⁰⁰ Several
 2 months later, a New York man was arrested for uploading and distributing CSAM using Discord.²⁰¹
 3 And two months later, a University of Florida quarterback was arrested and accused of sharing
 4 CSAM on Discord.²⁰² When the man spoke with the police after his arrest, he admitted that he had
 5 been on Discord servers that “discuss, solicit, and distribute child sexual abuse material.”²⁰³

6 176. 2023 was no different. For example, at the start of the year, a New York man was
 7 arrested and charged with creating and sharing CSAM through Discord after a police investigation
 8 revealed that he had allegedly instructed a 13-year-old boy to provide images and videos of himself
 9 committing sex acts on a 4-year-old girl.²⁰⁴ The next month, a Vancouver man was found guilty of
 10 numerous charges, including distributing and possessing CSAM, based largely on communications
 11 and videos the man shared on Discord showing the sexual assault of an infant by an adult man.²⁰⁵

12 177. These incidents continued throughout 2024. In February, for example, a New Jersey
 13 man was arrested after an investigation revealed that he had uploaded to Discord a file depicting
 14 the sexual exploitation or abuse of minors.²⁰⁶ At the time, the man was employed at a school serving
 15 students as young as five years old. A few months later, an Oklahoma man was arrested and charged

17 ²⁰⁰ U.S. Dep’t of Justice, *Registered Sex Offender Pleads Guilty to Possession of Child Sex Abuse*
 18 *Material* (May 10, 2022), [https://www.justice.gov/usao-edla/pr/registered-sex-offender-pleads-](https://www.justice.gov/usao-edla/pr/registered-sex-offender-pleads-guilty-possession-child-sexual-abuse-material)
 19 [guilty-possession-child-sexual-abuse-material](https://www.justice.gov/usao-edla/pr/registered-sex-offender-pleads-guilty-possession-child-sexual-abuse-material).

20 ²⁰¹ News 12 Staff, *Prosecutor: Phillipsburg Man Distributed Child Pornography Through*
 21 *Discord*, News12 The Bronx (Sept. 28, 2022), [https://bronx.news12.com/prosecutor-phillipsburg-](https://bronx.news12.com/prosecutor-phillipsburg-man-distributed-child-pornography-through-discord)
 22 [man-distributed-child-pornography-through-discord](https://bronx.news12.com/prosecutor-phillipsburg-man-distributed-child-pornography-through-discord).

23 ²⁰² Tim Stelloh & Antonio Planas, *University of Florida Quarterback Arrested and Accused of*
 24 *Sharing Child Sexual Abuse Images on Discord*, NBC News (Nov. 30, 2022),
 25 [https://www.nbcnews.com/news/us-news/university-florida-quarterback-arrested-allegedly-](https://www.nbcnews.com/news/us-news/university-florida-quarterback-arrested-allegedly-sharing-child-sexual-rcna59513)
 26 [sharing-child-sexual-rcna59513](https://www.nbcnews.com/news/us-news/university-florida-quarterback-arrested-allegedly-sharing-child-sexual-rcna59513).

27 ²⁰³ *Id.*

28 ²⁰⁴ *West New York Man Charged with Child Abuse Material*, Hudson Reporter (Jan. 19, 2023),
[https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-](https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-material/)
[material/](https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-material/).

²⁰⁵ Fox 12 Staff, *Washougal Man Gets 108 Years for Child Rape, Creating Child Sex Assault*
Materials, Fox 12 Oregon (Mar. 25, 2023), [https://www.kptv.com/2023/03/25/washougal-man-](https://www.kptv.com/2023/03/25/washougal-man-gets-108-years-child-rape-creating-child-sex-assault-materials/)
[gets-108-years-child-rape-creating-child-sex-assault-materials/](https://www.kptv.com/2023/03/25/washougal-man-gets-108-years-child-rape-creating-child-sex-assault-materials/).

²⁰⁶ Morris County Prosecutor’s Office, *Jefferson Resident Arrested for Child Pornography* (Feb.
 16, 2024), [https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-](https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-Releases/Jefferson-Resident-Arrested-for-Child-Pornography)
[Releases/Jefferson-Resident-Arrested-for-Child-Pornography](https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-Releases/Jefferson-Resident-Arrested-for-Child-Pornography).

1 with possessing and distributing CSAM after he shared CSAM on Discord.²⁰⁷ Later that year, a
 2 former Indiana firefighter was arrested after police learned he was trading CSAM on Discord.²⁰⁸

3 2. Discord provides a hunting ground for child-sex predators.

4 178. Discord has also created a haven for predators seeking to groom, traffic, and
 5 sexually abuse minors by providing predators with endless opportunities for unmitigated
 6 interactions with children through public servers, direct messages, and video/voice chat channels.

7 179. Discord hosts numerous servers that openly operate as spaces where children are
 8 sexually exploited by predators. In its June 2023 article on Discord, NBC News reported that it
 9 found numerous servers involving adults pretending to be teens to entice children into sharing
 10 nude images. NBC News described several servers that explicitly solicited minors to join “not safe
 11 for work” communities, including one server that promoted itself on the public server database as
 12 “a community for people between the ages of 13-17. We trade nudes, we do events. Join us for
 13 the best Teen-NSFW experience <3.”²⁰⁹ Another server claimed to accept “little girls 5-17 only”
 14 and had chat channels with titles such as “begging-to-have-sex-chat” and “sexting-chat-with-the-
 15 server-owner.”²¹⁰ Still another server directly solicited nude images from minors to gain access:
 16 “YOU NEED TO SEND A VERIFICATION PHOTO TO THE OWNER. IT HAS TO BE
 17 NUDE.”²¹¹

18 180. Other Discord servers are only slightly less obvious. For example, a server called
 19 “Family Hideout” centered on an adult man who called himself “Dad” and built a “family” of
 20 children online.²¹² In this server, which was labeled “Friendly,” “Family,” and “All-Ages,”
 21 the man developed relationships with children and encouraged them to take and share nude images.

23 ²⁰⁷ *Wagoner Man Arrested, Accused of Distributing Child Pornography Over Discord*, Fox 23
 24 News (June 25, 2024), [https://www.fox23.com/news/wagoner-man-arrested-accused-of-](https://www.fox23.com/news/wagoner-man-arrested-accused-of-distributing-child-pornography-over-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html)
 25 [distributing-child-pornography-over-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html](https://www.fox23.com/news/wagoner-man-arrested-accused-of-distributing-child-pornography-over-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html).

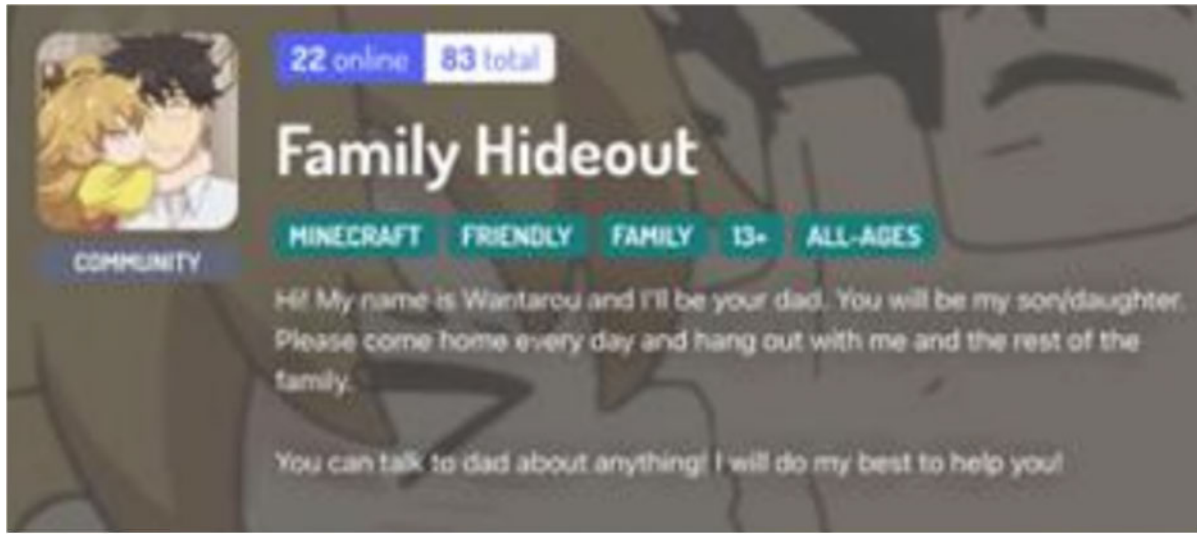
26 ²⁰⁸ Joe Schroeder, *Docs: Ex-Indiana Firefighter Traded Porn on Discord, Dated a 17-year-old*,
 Fox 59 (Sept. 4, 2024), [https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-](https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-child-porn-on-discord-dated-a-17-year-old/)
[child-porn-on-discord-dated-a-17-year-old/](https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-child-porn-on-discord-dated-a-17-year-old/).

27 ²⁰⁹ Goggin, *supra* note 194.

28 ²¹⁰ *Id.*

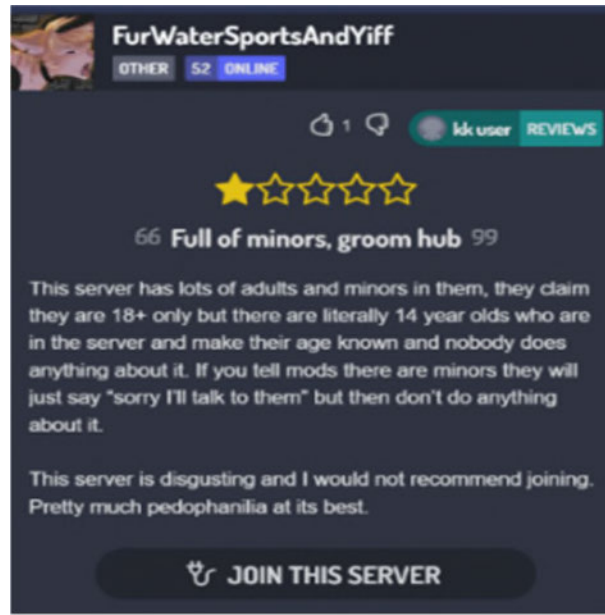
²¹¹ *Id.*

²¹² National Center on Sexual Exploitation, *supra* note 193.



Family Hideout server in March 2023.

181. Other servers are more discreet yet are still widely known as places where children are groomed. For instance, a server called “FurWaterSportsAndYiff” was described as “Full of minors, groom hub” by one disgusted reviewer of the server. According to the reviewer, this server was filled with minors and adults and was “[p]retty much pedophilia at its best.”²¹³



This server existed on Discord from 2022 through at least April 2023.

²¹³ *Id.*

1 182. Through numerous well-documented and publicized cases, Discord has long known
2 that its app enables and facilitates the grooming, trafficking, and sexual abuse of minors. For
3 example, in its June 2023 article, NBC News reviewed publicly available information since Discord
4 was founded and identified 35 cases in the previous six years in which adults were prosecuted on
5 charges of kidnapping, grooming, or sexual assault that involved communications on Discord.²¹⁴
6 Because these cases were only those that were reported, investigated, and prosecuted during that
7 time, “What we see is only the tip of the iceberg,” explained a child safety advocate.

8 183. Over the years, countless criminal cases have exposed the critical role that Discord
9 plays in enabling and facilitating grooming and other predatory conduct. In 2022, for instance, an
10 Indiana man pled guilty to sexual exploitation of a minor and possession of CSAM after the FBI
11 discovered that he had engaged in sexually explicit conversations with an 11-year-old girl on
12 Discord and coerced the girl into sending sexually explicit images of herself.²¹⁵ The girl later told
13 police that she communicated with the man via chats, video calls, and voice calls on Discord. Later
14 that year, an Oregon man was federally charged with child exploitation crimes following an
15 investigation that found he had “pretended to be an Oregon teenager to convince the child to engage
16 in sexually explicit acts during a video chat on Discord.”²¹⁶

17 184. Similar cases were brought throughout 2023 and 2024. In March 2023, for example,
18 a man was charged after he allegedly had a sexually explicit conversation with a 14-year-old girl
19 and shared CSAM with her—all on Discord.²¹⁷ At the time, the man was a middle-school science
20 teacher and had engaged in this conduct at the school where he was employed. And in 2024, a

22 ²¹⁴ Goggin, *supra* note 194.

23 ²¹⁵ Phyllis Cha, *Marion County Corrections Employee Fired, Arrested Over Sexually Explicit*
24 *Images to Girl*, IndyStar (Sept. 7, 2022),
<https://www.indystar.com/story/news/crime/2022/09/07/corrections-officer-marion-county-employee-sexually-explicit-messages-to-child/65781240007/>.

25 ²¹⁶ U.S. Dep’t of Justice, *Oregon Man Charged with Sexually Exploiting Minor on Discord,*
26 *Additional Victims Sought* (Oct. 3, 2022), <https://www.justice.gov/usao-or/pr/oregon-man-charged-sexually-exploiting-minor-discord-additional-victims-sought>.

27 ²¹⁷ *NJ Teacher Charged After “Sexually Explicit Conversation” with Teen*, New Jersey 101.5
28 (Mar. 3, 2023), <https://nj1015.com/nj-teacher-charged-after-sexually-explicit-conversation-with-teen/>.

1 South Carolina man was sentenced to 20 years in federal prison after he pled guilty to numerous
 2 crimes he committed against children on Discord, including coercing minor girls into performing
 3 livestream sexual acts for him in a Discord call that he recorded.²¹⁸ The man also made repeated
 4 threats to the girls and their families, and one of the girls attempted suicide because of this abuse.

5 185. Discord has also been at the center of numerous cases involving the kidnapping and
 6 sexual assault of minors. For example, in 2021, a Virginia man was arrested and charged with
 7 sexually exploiting and kidnapping a 12-year-old girl from her home in California.²¹⁹ According to
 8 court documents, the man met and groomed the girl on Discord, flew to California and picked her
 9 up at her house at 2:30 a.m., and was arrested at the Denver airport during a layover.

10 186. Similarly, in February 2023, a Michigan man was arrested and charged with
 11 kidnapping a 14-year-old Washington girl whom he had met and groomed on Discord.²²⁰ The next
 12 month, a North Carolina man was arrested and charged with rape, child abduction, and human
 13 trafficking after police rescued a 13-year-old from a locked shed behind his house.²²¹ According to
 14 the girl's mother, the man had been communicating with her daughter for months on Discord before
 15 he abducted her from her home in Dallas.

16 187. 2024 brought more of the same. In February, a Texas man was charged with human
 17 trafficking and sexual assault of a 16-year-old girl whom he met and communicated with on
 18

20 ²¹⁸ Alan Hovorka, *Lowcountry US Army Member Who Groomed Girls, Recorded Child Porn on*
 21 *Discord Sentenced to Prison*, Post & Courier (Aug. 3, 2024),
 22 https://www.postandcourier.com/news/evan-bucci-child-porn-discord-grooming/article_09cf85ce-50dc-11ef-84b2-7b7358023542.html.

23 ²¹⁹ Dan Morse, *With Children Stuck at Home During Coronavirus Shutdowns, Online Sexual*
 24 *Predators Can Swoop In*, Wash. Post (Feb. 12, 2023),
 25 https://www.washingtonpost.com/local/public-safety/coronavirus-lockdown-child-exploitation/2021/02/04/90add6a6-462a-11eb-a277-49a6d1f9dff1_story.html.

26 ²²⁰ Ruth Bashinsky, *Washington State Girl, 14, Who Went Missing with "Man She met on*
 27 *Discord" Near Notorious Sex Trafficking Corridor FOUND: Michigan Man Arrested over*
 28 *Kidnapping*, Daily Mail (Feb. 1, 2024), <https://www.dailymail.co.uk/news/article-13034633/washington-state-girl-missing-discord-sex-trafficking-michigan.html>.

²²¹ Peter Charalambous & Alexandra Faul, *Missing 13-year-old Rescued from Locked North*
Carolina Shed, ABC News (Mar. 14, 2023, <https://abcnews.go.com/US/missing-13-year-rescued-locked-north-carolina-shed/story?id=97830147>).

Discord.²²² The girl told police that the man picked her up in Kansas and brought her to his apartment in Texas, where they had sex multiple times. A few months later, a North Carolina man was charged with kidnapping and raping a 12-year-old girl he had met on Discord.²²³ Around the same time, a Pennsylvania man was arrested and charged with multiple offenses, including rape of a child and indecent assault of a person less than 13 years of age.²²⁴ The police investigation revealed that the man was communicating with the 12-year-old boy on Discord, which included sexual conversations and making plans to meet.

188. Despite Discord’s repeated assurances to parents that it has a “zero tolerance” policy for the criminal acts described above and that its product is built on safety, the rampant sexual exploitation of children on Discord has gotten only worse over the years—not better. John Shehan, the Senior Vice President of the National Center for Missing and Exploited Children, emphasized that his organization has seen “explosive growth” in CSAM and exploitation on Discord.²²⁵ “There is a child exploitation issue on the platform. That’s undeniable,” he stated.

189. Indeed, for four consecutive years, the National Center on Sexual Exploitation (“NCSE”) has named Discord to its “Dirty Dozen” list (which also includes Roblox, as discussed above). As NCSE put it, “Discord enables exploiters to easily contact and groom children,” and predators “take advantage of Discord’s dangerous designs to entice children into sending sexually explicit images of themselves.”²²⁶

²²² Brittany Eubank, *Man and His Mother Charged After Missing Kansas Teen Found Safe in Central Texas*, KVUEabc (Feb. 8, 2024), <https://www.kvue.com/article/news/crime/austin-human-trafficking-sexual-assault-missing-kansas-teen/269-361c25e3-12a8-4ec4-8779-0f962c12e8d1>.

²²³ “*Under 13 Is Under 13*”: Judge Responds to Attorney’s Claim That Man Charged with Kidnapping & Rape Believed 12-year-old Girl Was College Student, WRAL News (Apr. 16, 2024), <https://www.wral.com/story/under-13-is-under-13-judge-responds-to-attorney-s-claims-that-man-charged-with-kidnapping-rape-believed-12-year-old-girl-was-col/21381250/>.

²²⁴ Keith Heffintrayer, *Four Men Arrested Following Investigation into Sexual Abuse of 12-year-old Boy in Upper Gwynedd*, NorthPennNow (Apr. 15, 2024), <https://northpennnow.com/news/2024/apr/15/four-men-arrested-following-investigation-into-sexual-abuse-of-12-year-old-boy-in-upper-gwynedd-police-say/>.

²²⁵ Goggin, *supra* note 194.

²²⁶ National Center on Sexual Exploitation, *supra* note 59.

190. Discord itself confirms that this criminal conduct that it enables has only become more pervasive. Discord, for example, revealed that in the fourth quarter of 2023, it received 416,036 reports from users regarding “Child Safety” issues, which includes CSAM.²²⁷ By the next quarter, that number had grown to 1,035,166—a roughly 150% increase.²²⁸

4. Roblox and Discord work in tandem to facilitate child sexual exploitation.

191. Roblox and Discord serve as the preferred apps for predators seeking to identify and then sexually exploit children. As explained above, the tried-and-true playbook these predators follow is to misrepresent their age on Roblox to child users, pretending to be a fellow child, befriend the vulnerable young victims, and then manipulate the children to move the conversation off Roblox to Discord, where they coerce the children into sending sexually explicit images or into meeting in person so they can sexually abuse them.

192. Roblox and Discord designed their apps to work together seamlessly. As described above, Roblox encourages users to communicate on Discord by allowing links to Discord servers and channels to be displayed on game or group pages and by permitting users to include their Discord usernames in their Roblox profiles. Discord, for its part, enables users to link their Roblox accounts to their Discord accounts.²²⁹ Their “activity status” on Discord then shows other users, including predators, when they are playing Roblox and what game they are playing. On Discord, users can also send other users the codes for Robux gift cards to redeem on Roblox.

193. Through numerous media reports and well publicized criminal cases, Roblox and Discord have long known that their apps jointly enable predators to systematically harm children. For example, in 2019, a Florida man was arrested after law enforcement learned that he was using

²²⁷ Discord, *Discord Transparency Report: January – March 2023*, https://cdn.prod.website-files.com/625fe439fb70a9d901e138ab/64b16dade9ba30617e30a40a_Q1%2023%20%7C%20Discord%20Transparency%20Report_%20JANUARY%20-%20MARCH%202023.pdf.

²²⁸ Discord, *Discord Transparency Report: January – June 2024*, https://cdn.prod.website-files.com/625fe439fb70a9d901e138ab/67056a054d453d30491c1ac9_Discord%20Jan_Jun%202024%20Transparency%20Report.pdf.

²²⁹ YouTube, *How to Link Roblox to Discord* (2025), <https://www.youtube.com/watch?v=80ZEwlgecDM>.

1 Roblox and Discord to target children.²³⁰ According to authorities, the man targeted children
 2 between ages 10 and 12 on Roblox and then coerced them on Discord into sending sexually explicit
 3 images of themselves in exchange for Robux.

4 194. Similarly, in January 2022, a Florida man was arrested following a lengthy
 5 investigation that revealed that he posed as a teen girl on Roblox to meet a 13-year-old boy and
 6 then convinced to boy to send him sexually explicit images on Discord in exchange for Robux.²³¹
 7 Later that year, an Arizona man was arrested for kidnapping a 13-year-old boy he met on Roblox.²³²
 8 According to police, the man sent sexual and inappropriate messages on Roblox to the boy and
 9 then invited him to join a Discord chat, where the man arranged to pick the boy up from his house.

10 195. These real-life nightmares occurred repeatedly throughout last year. In November
 11 2024, for example, the FBI arrested a Michigan man and charged him with numerous crimes related
 12 to his sexual exploitation of possibly over 100 children.²³³ The man told law enforcement that “he
 13 used Roblox to talk to others sexually, some of whom he allegedly knew were children,” and then
 14 transitioned the conversations to Discord and coerced the children into sending nude images.²³⁴

15 196. And in January this year, a Louisiana man was arrested and federally charged for
 16 sexually exploiting a teenage girl through Roblox and Discord.²³⁵ According to arrest records, the

18 ²³⁰ Max Chesnes, *Deputies Say Vero Beach Man Used Popular Video Game Platforms to Target*
 19 *Children*, TCPalm (Aug. 20, 2019), <https://www.tcpalm.com/story/news/crime/indian-river-county/2019/08/20/detectives-advise-online-safety-after-vero-beach-man-used-video-game-platforms-target-minors/2059599001/>.

21 ²³¹ Irene Wright, *Man Blackmailed Teen Boy as He Posed as Girl on Roblox and Discord, Florida*
 22 *Cops Say*, Miami Herald (Aug. 11, 2023), <https://www.miamiherald.com/news/state/florida/article278172607.html>.

23 ²³² Jerry Lambe, *Arizona Man Allegedly Kidnapped a Boy He Lured from Discord. Police Say*
 24 *They Rescued the Victim Thanks to an “Alert Gas Station Attendant,”* Law & Crime (Dec. 29,
 2022), <https://lawandcrime.com/crime/arizona-man-allegedly-kidnapped-a-boy-he-lured-from-discord-police-say-they-rescued-the-victim-thanks-to-an-alert-gas-station-attendant/>.

25 ²³³ Samantha Sayles, *Monroe County Man Uses Roblox, Discord, Snapchat to Sexually Assault*
 26 *Children*, ClickOnDetroit (Nov. 15, 2024), <https://www.clickondetroit.com/news/local/2024/11/15/monroe-county-man-uses-roblox-discord-snapchat-to-sexually-exploit-children/>.

27 ²³⁴ *Id.*

28 ²³⁵ WAFB Staff, *Man Accused of Internet Sex Crimes Allegedly Met Victims on Roblox, Discord,*

1 man “began communicating with her on Roblox, before transitioning her to Discord,” where he
2 coerced her into sending sexually explicit images of herself.²³⁶

3 **D. Discord Knowingly Causes and Facilitates the Sexual Exploitation of Children.**

4 197. Like Roblox, Discord is overrun with harmful content and predators because the
5 company prioritizes growth, revenue, and eventual profits over child safety. For years, Discord has
6 knowingly prioritized these numbers over the safety of children through the actions it has taken
7 and decisions it has made to increase and monetize users regardless of the consequences.

8 **1. Discord prioritizes growth over the safety of children.**

9 198. Although Discord began as a communications app for gamers, its co-founders Jason
10 Citron and Stanislav Vishnevskiy soon realized that Discord appealed to a much broader audience
11 and sought to expand its user base. “We saw an opportunity to make communications easier for
12 everyone, not just gamers,” Citron explained.²³⁷ So the company changed its motto from “Chat for
13 gamers” to “A new way to chat with your communities and friends” and became hyper-focused on
14 transforming into a universal communication product.²³⁸

15 199. Discord has since grown exponentially. In 2019, the company had 56 million
16 monthly active users.²³⁹ But with Discord’s shift away from gaming in 2020, combined with its
17 pandemic-driven explosion in popularity among young users, the company grew its monthly active
18 users to 150 million by 2022.²⁴⁰ Today, Discord boasts over 200 million monthly active users.²⁴¹

20
21 WAFB (Jan. 31, 2025), <https://www.wafb.com/2025/01/31/man-accused-internet-child-sex-crimes-allegedly-met-victims-roblox-discord/>.

22 ²³⁶ *Id.*

23 ²³⁷ Nathan Latka, *Discord’s \$879M Revenue: 25 Moves to \$25B Valuation*, LATKA-B2B Saas Blog (Jan. 15, 2025), <https://blog.getlatka.com/discord-revenue/>.

24 ²³⁸ Kellen Browning, *How Discord, Born from an Obscure Game, Became a Social Hub for Young People*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

25 ²³⁹ HelpLama, *Discord Revenue and Usage Statistics 2025*, <https://helplama.com/discord-statistics/>.

26 ²⁴⁰ *Id.*

27 ²⁴¹ Podcast Transcript, *Discord CEO Jason Citron Makes the Case for a Smaller, More Private Internet*, The Verge (Apr. 22, 2024), <https://www.theverge.com/24134914/discord-ceo-gaming-chat-teens-safety-moderation-decoder-interview>.

200. As Discord has grown, private investors have poured money into the company. In June 2020, Discord raised \$100 million at a \$3.4 billion dollar valuation.²⁴² Just five months later, the company raised another \$100 million at more than double the valuation (\$6.90 billion).²⁴³ In early 2021, Discord rebuffed an acquisition offer from Microsoft of at least \$10 billion.²⁴⁴ Later that year, it raised another \$500 million at a staggering valuation of \$14.5 billion.²⁴⁵ While Discord has remained privately held so far, the company is expected to go public this year.²⁴⁶

201. A primary reason for investors' interest in Discord is its user growth, putting enormous pressure on the company to prioritize growing its users above all else. Growing its users is critical to the company's revenue and future profitability. Discord generates most of its revenue from its subscription service called Nitro, which provides users with benefits such as custom emojis, unlimited "super reactions," and HD video streaming. As the company expanded its user base, its revenue skyrocketed from \$150 million in 2020 to \$600 million in 2024.²⁴⁷ And while for years Discord shunned advertising on its app, the company recently started selling advertisements to boost revenue by capitalizing on its massive and growing user base.²⁴⁸

202. Discord's growth strategy has focused on a user-centric approach that prioritizes user preferences over child safety. As Discord CEO and co-founder Jason Citron put it, "We focus on what our users love, and that drives everything we do."²⁴⁹ In practice, that has resulted in Discord elevating the privacy of its users over protecting children in order to attract as many users to its app

²⁴² Equitybee, *Discord Funding History*, <https://equitybee.com/companies/company?company=discord> (last visited Feb. 11, 2025).

²⁴³ *Id.*

²⁴⁴ Sarah E. Needleman, *Discord Ends Deal Talks with Microsoft*, Wall. St. J. (Apr. 20, 2021), <https://www.wsj.com/articles/discord-ends-deal-talks-with-microsoft-11618938806>.

²⁴⁵ *Id.*

²⁴⁶ Chris Morris, *These Are the Most Anticipated IPOs to Watch in 2025*, FastCompany (Dec. 30, 2024), <https://www.fastcompany.com/91243719/most-anticipated-ipos-to-watch-in-2025>.

²⁴⁷ Salvatore Rodriguez & Sarah E. Needleman, *Discord to Start Showing Ads for Gamers to Boost Revenue*, Wall St. J. (Mar. 30, 2024), <https://www.wsj.com/tech/discord-to-start-showing-ads-for-gamers-to-boost-revenue-bf5848b9>.

²⁴⁸ Equitybee, *Discord Funding History*, <https://equitybee.com/companies/company?company=discord> (last visited Feb. 11, 2025).

²⁴⁹ Nathan Latka, *Discord's \$879M Revenue: 25 Moves to \$25B Valuation*, LATKA-B2B Saas Blog (Jan. 15, 2025), <https://blog.getlatka.com/discord-revenue/>.

1 as possible. For example, Discord continues to allow people to chat using fake names and does not
 2 require individuals to enter their real names when registering for an account, ensuring that predators
 3 will continue to flock to Discord because they can remain anonymous.

4 203. Discord even prioritizes user privacy over child safety with a feature it recently
 5 added to supposedly allow parents to monitor their children’s Discord use. In 2023, Discord created
 6 its “Family Center for Parents and Guardians”—a “completely opt-in feature” that is “not
 7 mandatory for teens.”²⁵⁰ While this feature permits parents to monitor some of their children’s
 8 activity on Discord, it prohibits parents from accessing the most important information on their
 9 accounts—the contents of their messages. As Discord tells children, “We value your privacy which
 10 is why connected accounts will not have access to the contents of your messages.”²⁵¹ Discord also
 11 assures children that, with Family Center, “you have control over whether or not you use this
 12 feature, how long you want to use it for, and who you connect your account to.”²⁵² By putting
 13 children in charge of this parental feature, Discord seeks to preserve growth of this key
 14 demographic.

15 204. In pursuit of growth, Discord has also chosen not to implement easy measures that
 16 would protect children but stunt user growth, such as age verification to ensure that children under
 17 13 cannot create accounts and that adults cannot misrepresent their age to children.

18 205. Discord has also fought attempts to be held publicly accountable for the sexual
 19 exploitation of children that its app enables. In November 2023, Discord’s CEO and co-founder
 20 Eric Citron refused to accept service of a subpoena to testify before the U.S. Senate as part of its
 21 hearing on “Big Tech and the Online Child Sexual Exploitation Crisis.”²⁵³ Citron appeared at the
 22

23 ²⁵⁰ Discord, *What Is Family Center?*, [https://support.discord.com/hc/en-](https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=We%20value%20your%20privacy%20which,names%2C%20server%20icons%2C%20and%20member)
 24 [us/articles/14155039712407-What-is-Family-](https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=We%20value%20your%20privacy%20which,names%2C%20server%20icons%2C%20and%20member)

25 [Center#:~:text=We%20value%20your%20privacy%20which,names%2C%20server%20icons%2C%20and%20member](https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=We%20value%20your%20privacy%20which,names%2C%20server%20icons%2C%20and%20member) (last visited Feb. 11, 2025).

26 ²⁵¹ *Id.*

27 ²⁵² *Id.*

28 ²⁵³ *Senate Panel Forced to Use U.S. Marshals to Subpoena CEOs of X and Discord to Testify on Protecting Kids Online*, CBS News (Nov. 21, 2023), <https://www.cbsnews.com/news/senate-panel-us-marshals-subpoenas-ceos-x-discord/>.

1 hearing only after the Senate was forced to enlist the U.S. Marshals Service to personally subpoena
2 him—a situation the Senate called “a remarkable departure from typical practice.”²⁵⁴

3 206. The National Center for Missing and Exploited Children, which internet companies
4 are by law required to report instances of child sex abuse to, also reported issues working with
5 Discord and had to rescind an invitation to become part of its Cybertipline Roundtable when the
6 company failed to “identify a senior child safety representative to attend.”²⁵⁵ “It was really
7 questionable, their commitment to what they’re doing on the child exploitation front,” stated John
8 Shehan, the Senior Vice President of the National Center for Missing and Exploited Children.²⁵⁶

9 **2. Discord facilitates child sexual exploitation through the design of its app,**
10 **inadequate safety features, and refusal to invest in basic safety protections.**

11 207. Discord’s pursuit of growth over child safety is reflected in numerous actions it took
12 and decisions it made related to the design and safety of its app. Had Discord acted differently, the
13 harm suffered by countless children would not have occurred.

14 208. Discord designed its app so that anyone can easily communicate with children,
15 creating a virtual world where predators can freely target and sexually exploit children. Despite its
16 repeated assurances to parents that its app “defaults” to safety for child accounts, Discord, in fact,
17 designed its app to default to settings that facilitate the sexual exploitation of children.

18 209. Discord, for example, defaults to settings that allow predators to send direct
19 messages to children. Predators often identify and target children by joining servers that are
20 populated with kids. By default, Discord allows any two people who share a server to direct
21 message each other, providing predators with an easy means of contacting and communicating with
22 children. Predators also often initiate contact with children by adding a child as a “friend” on
23 Discord so they can direct message them. By default, Discord permits children to receive friend
24 requests from “Everyone,” meaning children can receive and accept friend requests from
25 individuals whom they do not know and with whom they have no connection.

26
27 ²⁵⁴ *Id.*

28 ²⁵⁵ Goggin, *supra* note 194.

²⁵⁶ *Id.*

210. For years, Discord also defaulted to settings that enabled predators to send children sexually explicit images via direct messages. In 2017, for example, Discord introduced “Safe Direct Messaging.” This feature contained three options, including “Keep me safe,” which supposedly would automatically scan and delete messages that a child received containing explicit content.

The process is pretty simple. Safe Direct Messaging has three settings:

The differences are pretty simple:

Keep me safe: The safest option. This will have Discord scan any image sent in all DMs, regardless of whether you've added the user on your friend list, or the user is DMing you just by sharing a mutual server.

My friends are nice: The medium-est option! This will let Discord know to scan any images sent in DMs from users that aren't on your friends list, but also to trust your previously-added friends and not worry about any images they send.

Do not scan: The self-confident option. Enabling this option will completely disable Discord's image scanning process, and leave you for a walk on the wild side for any and all DMs you receive. Careful, it's a jungle out there!

*Discord's description of the categories of its Safe Direct Messaging feature.*²⁵⁷

211. Consistent with Discord's “default to safety” promise, the company long represented that the “Keep me safe” option was on by default. In fact, though, Discord defaulted not to this most restrictive setting but to the lower setting of “My friends are nice,” which meant that Discord would not scan any images from a child's “friend”—which could be anyone.

If you do not want to see age-restricted content on Discord

If you do not want to be exposed to age-restricted content on Discord, or if you are under 18 years old, we recommend **turning on the explicit media content filter in your privacy settings**. In your *User Settings*, select *Privacy & Safety*, and choose 'Keep me safe' under *Safe Direct Messaging*. This setting is on by default and will ensure that images and videos in all direct messages are scanned by Discord and age-restricted content is blocked.

²⁵⁷ Discord, *Discord Safety: Safe Messaging!*, <https://web.archive.org/web/20210203000438/https://support.discord.com/hc/en-us/articles/115000068672-Discord-Safety-Safe-Messaging-> (archived Feb. 3, 2021).

Discord’s “Age-Restricted Content on Discord” webpage in 2022.²⁵⁸

212. Discord later changed the labels of this feature from “Keep me safe” to “Filter all direct messages” and from “My friends are nice” to “Filter direct messages from non-friends.”²⁵⁹ But it continued to default to the less restrictive setting: “By default, these filters are set to ‘Filter direct messages from non-friends.’ Choose ‘Filter all direct messages’ if you want all direct messages you receive to be filtered, or select ‘Do not filter direct messages’ to turn these filters off.”²⁶⁰

213. Although parents can change Discord’s permissive default settings to more restrictive ones, that option is meaningless because Discord enables children to modify these safety settings without parental approval. So a parent might modify the default settings so that their child cannot exchange direct messages with other server members or cannot receive friend requests from “Everyone,” only to have their child simply change those settings to allow these unfettered interactions. As Discord puts it, “[o]ur product architecture provides each user with fundamental control over their experience on Discord including who they communicate with, what content they see, and what communities they join or create.”²⁶¹ By doing so, Discord strips parents of basic protective options that would prevent adult strangers from targeting and exploiting their children. As one parent explained in calling Discord an “EXTREMELY dangerous app,” Discord does not provide “any way for parents to set settings that can’t simply be undone by kids.”²⁶²

214. Discord also refused to implement other simple measures that would have protected children using its product. For example, despite having the ability to do so, Discord does not require users to verify their age and identify when creating an account. Doing so would have prevented

²⁵⁸ Discord, *Age-Restricted Content on Discord*, https://web.archive.org/web/20220406085122mp_/https://discord.com/safety/360043653552-Age-Restricted-Content-on-Discord (archived Apr. 6, 2022) (emphasis added).

²⁵⁹ Discord, *Helping Your Teen Stay Safe on Discord*, <https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023).

²⁶⁰ *Id.*

²⁶¹ Discord, *Discord Parent Hub*, <https://discord.com/safety-parents> (last visited Feb. 11, 2025).

²⁶² National Center on Sexual Exploitation, *supra* note 193.

1 predators from creating fake profiles and pretending to be children, which is their preferred
2 approach in targeting children and convincing them to share sexually explicit images.

3 215. Age and identity verification would also have prevented individuals under 13 from
4 creating accounts on Discord. In many of the criminal cases involving the sexual exploitation of
5 children on Discord, the children were under the age of 13. By requiring ID verification during the
6 account sign-up process—a practice that other online products employ—Discord could have easily
7 prevented these children from even using its app. But it chose not to, despite knowing for years
8 that children under 13 operate freely on its environment and are targeted by predators.

9 216. Discord also could have placed a higher age rating on its application in the iOS App
10 Store and other app stores to signal to parents that the app presented risks for children. Discord
11 likewise could have provided clear warnings to parents about the presence of sexual predators on
12 the platform so that parents could make an informed decision about allowing their child on the
13 platform and/or educate their child on how to stay safe on the platform. Discord could also have
14 provided clear warnings to children about the presence of sexual predators on the platform, and
15 instructed children on how to stay safe on the platform.

16 217. Despite these glaring failures, Discord constantly promotes its technology-focused
17 “safety solutions” including its “AI-powered moderation systems.”²⁶³ But this technology has
18 proven grossly inadequate and insufficient to protect children from sexual exploitation. For
19 instance, Discord’s Teen Safety Assist feature, which it introduced in October 2023, is supposed to
20 “automatically blur media that may be sensitive in direct messages and group direct messages with
21 friends, as well as in servers,” and send “safety alerts” to teen users when they receive a direct
22 message from a user for the first time.”²⁶⁴ Yet this feature is “utterly defective,” according to the
23 National Center on Child Exploitation.²⁶⁵ As part of its annual investigation into Discord, “NCOSE
24

25 _____
26 ²⁶³ Discord, *Discord’s Commitment to Teen and Child Safety* (July 11, 2023),
<https://discord.com/safety/commitment-to-teen-child-safety>.

27 ²⁶⁴ Savannah Badalich, *Building a Safer Place for Teens to Hang Out*, Discord (Oct. 24, 2023),
<https://discord.com/safety/safer-place-for-teens>.

28 ²⁶⁵ National Center on Sexual Exploitation, *supra* note 59.

1 researchers were able to send sexually explicit content from an adult account to an unconnected
2 13-year-old account, and no warning or resources were displayed.”²⁶⁶

3 218. Discord is also famously slow and ineffective at responding to child-safety issues.
4 One mother, for example, told CNN that Discord essentially refused to help her after she reported
5 that a man had communicated with her 10-year-old daughter and sent her links to pornography.²⁶⁷
6 Following the mother’s report, Discord sent her an automated message asking for “the message
7 links to the reported content for the team to review and take appropriate action.”²⁶⁸ After the mother
8 sent the requested links, Discord never responded. “There was no help at all,” she said.²⁶⁹

9 219. Child protection groups have also repeatedly highlighted flaws in Discord’s
10 approach to child safety. For example, Denton Howard, executive director of Inhope, an
11 organization of missing and exploited children hotlines from around the world, has flagged
12 numerous problems with Discord’s approach to child safety, including “slow response times to
13 reports, communications issues when [child protection] hotlines tried to reach out, hotlines
14 receiving account warnings when they try to report CSAM, the continued hosting of communities
15 that trade and create CSAM, and evidence disappearing before hearing back from Discord.”²⁷⁰

16 **VI. PLAINTIFF-SPECIFIC ALLEGATIONS**

17 220. Plaintiff is a 16-year-old girl who was an avid Roblox and Discord user. She was
18 horrifically and traumatically sexually exploited by several predators through Defendants’
19 dangerous apps, which enabled and facilitated these predators’ crimes. As the result of Defendants’
20 reckless disregard for child safety, Plaintiff has suffered devastating psychological trauma. Her life
21 will never be the same.

22 221. Plaintiff was 9 years old when she began playing on Roblox. Plaintiff’s mother
23 believed that Roblox was safe for children because it was designed and marketed for kids. As
24

25 ²⁶⁶ *Id.*

26 ²⁶⁷ Samantha Murphy Kelly, *The Dark Side of Discord for Teens*, CNN Business (Mar. 22, 2022),
<https://www.cnn.com/2022/03/22/tech/discord-teens/index.html>.

27 ²⁶⁸ *Id.*

28 ²⁶⁹ *Id.*

²⁷⁰ Goggin, *supra* note 194.

1 discussed above, Roblox spent considerable time and money publicly touting the safety and
2 security of the app, which created the public perception that Roblox had created a safe environment
3 for kids. Unbeknownst to Plaintiff's mother at the time, this was nothing more than a false façade
4 of safety.

5 222. Based on the false, misleading, and dangerously inadequate assurances from
6 Roblox, Plaintiff's mother was misled into believing that Roblox was a safe app for Plaintiff to use
7 and therefore allowed Plaintiff to use Roblox. She trusted Roblox's deceptive representations that
8 it used state-of-the-art technology and other safety measures to ensure that Plaintiff would be safe
9 on its app.

10 223. In reality, Roblox deliberately misled parents while knowing its platform facilitated
11 predatory behavior. By this time, Roblox had long been aware—from countless police reports and
12 incidents reported in the media—that its app was widely used by predators to target, groom, and
13 sexually assault children. Roblox specifically knew from numerous tragic events that occurred in
14 the real world that predators target and manipulate children on its app by lying about their age. Yet
15 rather than warn parents or take other measures to protect children from harm, Roblox continued
16 with its deceptive campaign to portray the app as safe for children and to conceal information that
17 it knew about the pervasive predatory conduct that its app enabled and facilitated.

18 224. When Plaintiff was 12 years old, she began using Discord without her mother's
19 permission. She was able to easily create an account despite being under 13 years old at the time.

20 225. In 2023, when Plaintiff was a vulnerable 14-year-old, she was targeted on Roblox
21 by a violent and depraved predator. The predator exploited Plaintiff's age and vulnerability to build
22 a false emotional connection with her by promising friendship. The predator utilized the popular
23 Roblox experience, "Dollhouse Roleplay," to target Plaintiff. Roblox allowed Plaintiff to create an
24 account and engage with an adult predator, establishing a foundation of deception that would enable
25 devastating and irreparable abuse.

26 226. The predator, who went by the username, "Repent," began regularly interacting with
27 Plaintiff via Roblox's chat messaging and voice recording features to build trust and establish a
28 false friendship that would facilitate future manipulation and coercion. Once the predator had

1 sufficiently groomed Plaintiff, he convinced Plaintiff to transition their communications to Discord
2 by asking her if she would be his “friend” on Discord. This platform migration represents a common
3 predatory tactic to move minor-victims to even more dangerous environments.

4 227. Once friends on Discord, the predator coerced Plaintiff into joining a fetish
5 community which, among other things, encouraged young, minor girls to dress in “doll-like”
6 clothes and roleplay being “little girls,” which is commonly referred to as “age-play” with these
7 fetish communities. This particular community also glorified and encouraged other horrific acts of
8 abuse such as self-harm, requests to self-harm, necrophilia, pedophilia, blood-play (i.e., using blood
9 to depict sexual enjoyment or arousal), knife-play, and rape-play.

10 228. While on Discord, the predator escalated to a well-documented form of exploitation
11 that both Roblox and Discord have known about for years but have failed to prevent, coercing and
12 manipulating Plaintiff into sending sexually explicit images and videos of herself to him on
13 Discord. The predator consistently coerced Plaintiff to chat with him using Discord’s messaging
14 platform. Despite knowing Plaintiff was a minor—information she had disclosed to him – through
15 this platform, the predator convinced Plaintiff to phone chat, video chat, and send sexual images
16 and videos to him, including videos of her masturbating.

17 229. This relationship, which was possible only because of Defendants’ defectively
18 designed apps, continued unimpeded for over two years and only escalated further. Leveraging the
19 trust he had cultivated through Defendants’ apps, the predator coerced Plaintiff into carving her
20 skin over a hundred times. The predator would send Plaintiff “inspo-pics,” which included pictures
21 of a wall that had messages like, “[H]elp me, I’m being held hostage by Repent” written out in
22 blood.

23 230. The predator then deployed coercive grooming tactics demanding that Plaintiff cut
24 herself and write messages to him on her wall and other surfaces. Plaintiff repeatedly cut herself,
25 sometimes up to 30-50 cuts “per session” to replicate the images he sent. The predator berated
26 Plaintiff when she ran out of blood from her cuts and could not finish the message, or when she did
27 not cut deep enough to satisfy him. The predator, who Plaintiff believed to be her friend, coerced
28 Plaintiff into carving her tongue three times in an attempt to satisfy him, arguing that each cut was

1 not deep enough to his liking. He also coerced Plaintiff into carving his username into her thigh.
2 This predator threatened to rape her or make her kill her pets if she did not properly satisfy his
3 demands. Multiple additional perpetrators employed these same coercive tactics, revealing the
4 systematic failure of Defendants to protect vulnerable users from coordinated predatory behavior.

5 231. In 2023, one of Plaintiff's virtual "friends" on Roblox invited her to a "dark-fantasy"
6 community server on Discord. Once she joined the server, a predator whose username was Roman
7 targeted, groomed, and manipulated Plaintiff. Roman coerced Plaintiff into carving his username
8 into both of her breasts on multiple occasions. Plaintiff thought Roman was a teenager until he sent
9 her a message that said, "would you still love me if I was a 34-year-old?" When Plaintiff's mother
10 discovered the images Plaintiff had taken of herself for Roman, she also discovered that Plaintiff
11 had provided Roman with personal information about their family, including Plaintiff's father's
12 address. Fearing for their safety and that Plaintiff might be kidnapped, Plaintiff's mother contacted
13 the FBI. The FBI investigation revealed that this predator was a part of a cult community on Discord
14 and that he was not the only member of this cult who had abused Plaintiff. Plaintiff later confided
15 in her mother that she had sent sexually explicit photos and videos to multiple other predators who
16 bullied her and coerced her into sharing this content, which included images and videos of Plaintiff
17 masturbating and videos and images of the predators themselves masturbating. Plaintiff's sexually
18 explicit images were posted across numerous social media platforms. Following the public posting
19 of her images and the resulting ridicule, Plaintiff developed anorexia and bulimia.

20 232. The 2023 FBI investigation led to several arrests because Plaintiff was able to
21 provide usernames of the predators.

22 233. As a result of this discovery, Plaintiff's mother prohibited her from accessing
23 electronic devices or using any of Defendants' apps. Despite these restrictions, Plaintiff had been
24 so significantly groomed and manipulated into believing that the predators were her only friends
25 and source of love that she would find ways to regain access to devices in order to reconnect with
26 her abusers.

27 234. Every time Plaintiff's mother deleted her accounts or took away her devices,
28 Plaintiff would make new accounts or borrow someone else's phone to access the apps. Plaintiff

1 does not recall ever entering any type of age verification each time she signed up for a new account.
2 In fact, even after Roblox banned Plaintiff's account, she was able to make another account and
3 regain access. This demonstrates the powerful psychological control exerted by the predators and
4 underscores Defendants' failure to implement safeguards that could have disrupted this ongoing
5 exploitation.

6 235. In 2024, Plaintiff was targeted and abused by another adult male predator on Roblox
7 whose username was Camboy. This predator manipulated and groomed Plaintiff into believing they
8 had a special, romantic relationship. Every night after Plaintiff's mother went to bed, Plaintiff
9 would take her brother's phone and communicate with Camboy. Once Camboy had earned
10 Plaintiff's trust, he asked her to cut herself for him. Plaintiff would undress completely and use
11 various blades to cut her thighs, knees, breasts, neck, and stomach to satisfy Camboy's demands.
12 She would also lie in her bathtub fully nude, exposing her cuts and ensuring that her blood dripping
13 down the walls of the tub was visible in the frame – otherwise, Camboy would be upset. Camboy
14 also coerced Plaintiff into carving his username into her breasts, stomach, and thigh.

15 236. In August 2025, the FBI came to Plaintiff's mother's home to advise her that
16 Plaintiff was a victim of one of the community cults operating on Roblox and Discord that
17 encourages members to self-harm for sexually gratifying purposes. The FBI informed Plaintiff's
18 mother that one of the abusers went by the username, "Repent." As noted above, Repent had been
19 abusing Plaintiff since 2023, and in 2025, the FBI informed Plaintiff and her mother that Repent
20 was targeting and abusing many minors online.

21 237. These predators groomed and manipulated Plaintiff into believing they were her
22 only friends and the only people who loved her. As a result, she isolated herself from healthy
23 relationships with friends and family, deepening her vulnerability to exploitation. This is a well-
24 documented grooming tactic that Defendants knew was occurring on their apps, yet they failed to
25 take reasonable steps to design their apps to prevent such predatory behavior.

26 238. Soon after Plaintiff was sexually exploited as the result of Defendants' defectively
27 designed apps, she became severely depressed and withdrawn. She isolated herself from her once-
28 close circle of friends and family, particularly her mother. She abandoned creative outlets she had

1 once loved and excelled in, such as art and nail art. During her freshman year of high school,
2 Plaintiff had been accepted into a dual-enrollment program that would have allowed her to earn
3 college credits while completing high school. However, because participation required access to
4 electronic devices, she was forced to withdraw from the program, as she could not be trusted with
5 unsupervised device access due to the risk of reestablishing contact with her abusers. In addition,
6 Plaintiff's mother has delayed allowing her to obtain her driver's license out of fear she might
7 attempt to meet other predators in person.

8 239. Plaintiff has suffered and continues to suffer through life-altering and permanent
9 psychological, emotional, and physical injuries.

10 240. Following the devastating discovery of Plaintiff's ongoing abuse and restriction to
11 the apps, Plaintiff attempted to commit suicide on multiple occasions. For safety reasons, Plaintiff's
12 mother has removed Plaintiff's bedroom door and has put up video surveillance in Plaintiff's
13 bedroom.

14 241. Plaintiff has sought and continues to seek inpatient medical treatment, psychiatric
15 treatment, counseling, and treatment through FBI-associated child advocacy programs.

16 242. Defendants are directly responsible for the immense harm that Plaintiff has suffered.
17 Had Plaintiff's mother known the truth about Roblox, she never would have permitted Plaintiff to
18 use these apps. Had Defendants implemented even the most basic system of screening or age and
19 identity verification, as well as other basic safety measures, Plaintiff never would have interacted
20 with these predators and never would have suffered the harm that she did. Plaintiff's life has been
21 immeasurably devastated as a direct result of Defendants' conduct.

22 **VII. CAUSES OF ACTION**

23 **FIRST CAUSE OF ACTION**

24 **FRAUDULENT CONCEALMENT AND MISREPRESENTATION**

25 **(By Plaintiff Against Roblox)**

26 243. Plaintiff incorporates each and every factual allegation set forth above.

27 244. This claim is brought against Defendant Roblox.

1 245. As set forth in more detail above, Defendant Roblox knew about the defective
2 conditions of its app and that the app posed serious safety risks to child users. Instead of disclosing
3 the truth, Defendant Roblox engaged in a widespread public campaign to tout the safety of its
4 platform in the media, and in the materials provided to potential users of the app, as described
5 above.

6 246. Defendant Roblox made numerous false representations about the safety of its app,
7 as described above, which were specific and widespread. Plaintiff and the public at large relied on
8 Defendant's false representations in deciding to allow children to play on the app.

9 247. Defendant Roblox was under a duty to tell the public the truth and to disclose the
10 defective conditions of its app and that the app posed serious safety risks to child users.

11 248. Defendant Roblox breached its duty to the public, users, and their parents by
12 concealing, failing to disclose, and/or making misstatements about the serious safety risks
13 presented by its app. Even though Defendant Roblox knew of those risks based on Defendant's
14 internal reviews, external studies known to Defendant, and parent and police reports made to
15 Defendant, they intentionally concealed those risks to not lose users and revenue, and to induce
16 parents to allow their children to use Defendant's app.

17 249. Defendant's representations regarding the safety of its app were false, and
18 Defendant Roblox knew that its representations about the safety of its app were false when the
19 statements were made.

20 250. By intentionally making numerous material representations, downplaying any
21 potential harm associated with its app, and reassuring the public, users, and parents, including
22 Plaintiff's mother, that its app was safe, Defendant fraudulently misled the public, users, and their
23 parents, including Plaintiff's mother, into believing its app was safe for children to use.

24 251. Defendant Roblox intended for the public, users, and their parents, including
25 Plaintiff's mother, to rely on its representations about the safety of its app.

26 252. The public, users, and their parents, including Plaintiff's mother, reasonably relied
27 on the representations made by Defendant Roblox about the safety of its app for use by children.
28

1 253. Defendant Roblox intentionally failed to disclose the serious safety risks posed by
2 the design of its app to the public, users, and their parents, including Plaintiff's mother. Such risks
3 were known only to Defendant through its internal reviews and external studies known to
4 Defendant, as well as parent and police reporting to Defendant, and the public, users, and their
5 parents, including Plaintiff's mother, could not have discovered such serious safety risks.

6 254. The public, users, and their parents, including Plaintiff's mother, did not know of
7 the serious safety risks posed by the design of Defendant's app, which were known by Defendant
8 Roblox.

9 255. By intentionally concealing and failing to disclose defects inherent in the design of
10 their apps, Defendant Roblox knowingly and recklessly misled the public, users, and their parents,
11 including Plaintiff's mother, into believing its app was safe for children to use.

12 256. Defendant Roblox knew that its concealment, misstatements, and/or omissions were
13 material. A reasonable person, including Plaintiff's mother, would find information about the risk
14 of grooming, sexual abuse, sexual exploitation, and other serious risks associated with the use of
15 Defendant's app, to be important when deciding whether to allow children to use them.

16 257. Defendant Roblox intended to deceive the public, users, and their parents, including
17 Plaintiff's mother, by concealing the defects in the design of its app, which made the app unsafe.

18 258. As a direct and proximate result of Defendant's material omissions,
19 misrepresentations, and/or concealment of material information, Plaintiff's mother was not aware
20 and could not have been aware of the facts that Defendant concealed or misstated, and therefore
21 justifiably and reasonably believed that Defendant's app was safe for children to use.

22 259. If the serious safety risks presented by the design of Defendant's app had been
23 disclosed, the public, users, and their parents, including Plaintiff's mother, reasonably would have
24 acted differently and/or would have not permitted children to use the apps.

25 260. As a direct and proximate result of Defendant's material omissions,
26 misrepresentations, and/or concealment of material information, Plaintiff sustained serious injuries
27 and harm.

1 261. Defendant's concealment and Plaintiff's mother's reliance on Defendant's
2 representations about the safety of its app were substantial factors in causing harm to Plaintiff.

3 262. Defendant's conduct, as described above, was intentional, fraudulent, willful,
4 wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and displayed an
5 entire want of care and a conscious and depraved indifference to the consequences of its conduct,
6 including to the health, safety, and welfare of its customers, and warrants an award of punitive
7 damages in an amount sufficient to punish Defendant Roblox and deter others from like conduct.

8 263. Plaintiff demands judgment against Defendant Roblox for compensatory and
9 punitive damages, together with interest, costs of suit, attorneys' fees, and all such other relief as
10 the Court deems proper.

11 **SECOND CAUSE OF ACTION**

12 **NEGLIGENT MISREPRESENTATION**

13 **(By Plaintiff Against Defendant Roblox)**

14 264. Plaintiff incorporates each and every factual allegation set forth above.

15 265. This claim is brought against Defendant Roblox.

16 266. As set forth in more detail above, Defendant Roblox knew about the defective
17 conditions of its app and that the app posed serious safety risks to child users.

18 267. Defendant Roblox was under a duty to tell the public the truth and to disclose the
19 defective conditions of its app and that the app posed serious safety risks to child users.

20 268. Defendant Roblox breached its duty to the public, users, and parents of minor users
21 by concealing, failing to disclose, and making misstatements about the serious safety risks
22 presented by its app. Even though Defendant Roblox knew of those risks based on Defendant
23 Roblox's internal reviews, external studies known to Defendant Roblox, and parent and police
24 reports made to Roblox, it intentionally concealed those risks to not lose users and revenue, and to
25 induce parents to allow their children to use its app.

26 269. Defendant Roblox's representations that its app was safe for use by children were
27 not true.

NEGLIGENCE – GENERAL

(By Plaintiff Against Each Defendant)

278. Plaintiff incorporates each and every factual allegation set forth above.

279. This claim is brought against Defendants Roblox and Discord.

280. At all relevant times, each Defendant developed, set up, managed, maintained, operated, marketed, advertised, promoted, supervised, controlled, and benefited from its respective app used by Plaintiff.

281. Each Defendant owed Plaintiff a duty to exercise reasonable care in the development, setup, management, maintenance, operation, marketing, advertising, promotion, supervision, and control of its app and not to create an unreasonable risk of harm from and in the use of its app (including an unreasonable risk of grooming, sexual abuse, and sexual exploitation, and other associated physical or mental injuries); to protect Plaintiff from unreasonable risk of injury from and in the use of its app; and not to invite, encourage, or facilitate youth, such as Plaintiff, to foreseeably engage in dangerous or risky behavior through, on, or as a reasonably foreseeable result of using its app. These duties govern Defendants' own specific actions and are based on direct actions Defendants took in developing their apps and features.

282. In addition, each Defendant owed a special relationship duty to Plaintiff to protect her against harm caused by its app and employees or by other users. This special relationship duty is based on the following:

- a. As businesses, Defendants owe a duty to protect customers against reasonably foreseeable criminal acts of third parties and other dangers known to Defendants on their apps;
- b. Plaintiff, a minor, was vulnerable and dependent on Defendants for a safe environment on their apps, and Defendants have superior ability and control to provide that safety with respect to activities that they sponsor or control;
- c. Plaintiff relied upon Defendants for protection against third-party misuse or misconduct;

- 1 d. The special relationship Plaintiff had with Defendants substantially benefits
2 Defendants through profits and growth in users and user activity. Defendants
3 could not successfully operate without the growth in users and user activity
4 generated by children;
- 5 e. Defendants were far more to Plaintiff than a business. Defendants provided
6 Plaintiff with opportunities for social interaction and a discrete community of
7 other users. Plaintiff was dependent on Defendants to provide structure,
8 guidance, and a safe environment;
- 9 f. Defendants have superior control over their app environments and the ability to
10 protect their users. Defendants impose a variety of rules and restrictions to
11 supposedly maintain a safe and orderly environment. Defendants employ
12 internal staff to enforce these rules and restrictions and can monitor and
13 discipline users when necessary. Defendants have the power to influence
14 Plaintiff's values, consciousness, relationships, and behaviors; and
- 15 g. Defendants have voluntarily undertaken a responsibility to keep children safe
16 on their apps. As alleged above, Defendants have publicly stated that they take
17 steps to keep children safe on their apps and therefore have undertaken a duty
18 to act reasonably in taking such steps.

19 283. Plaintiff was a foreseeable user of each Defendant's app.

20 284. Each Defendant knew that minors such as Plaintiff would use its app.

21 285. Each Defendant invited, solicited, encouraged, or reasonably should have foreseen
22 the fact, extent, and manner of Plaintiff's use of its app.

23 286. Each Defendant knew or, by the exercise of reasonable care, should have known,
24 that the reasonably foreseeable use of its respective app (as developed, set up, managed,
25 maintained, supervised, and operated by that Defendant) was dangerous, harmful, and injurious
26 when used by youth such as Plaintiff in a reasonably foreseeable manner.

27 287. At all relevant times, each Defendant knew or, by the exercise of reasonable care,
28 should have known that its respective app (as developed, set up, managed, maintained, supervised,

1 and operated by that Defendant) posed unreasonable risks of harm to youth such as Plaintiff, which
2 risks were known and knowable, including in light of the internal data and knowledge each
3 Defendant had regarding its app.

4 288. Each Defendant knew, or by the exercise of reasonable care, should have known,
5 that ordinary child users of its respective app, such as Plaintiff, would not have realized the potential
6 risks and dangers of using the app, including a risk of grooming, sexual abuse, and sexual
7 exploitation, which foreseeably can lead to a cascade of negative effects, including but not limited
8 to physical injury, damage to self-worth, stigma and social isolation, reduced academic
9 performance, increased risky behavior, susceptibility to future sexual exploitation, attachment
10 issues, identity confusion, and profound mental health issues for young consumers, including but
11 not limited to depression, anxiety, suicidal ideation, self-harm, post-traumatic stress disorder,
12 insomnia, eating disorders, death, and other harmful effects.

13 289. Each Defendant's conduct was closely connected to Plaintiff's injuries, which were
14 highly certain to occur, as evidenced by the significance of Plaintiff's injuries.

15 290. Each Defendant could have avoided Plaintiff's injuries with minimal cost,
16 including, for example, by not including certain features in its respective app which harmed
17 Plaintiff.

18 291. Imposing a duty on Defendants would benefit the community at large.

19 292. Imposing a duty on Defendants would not be burdensome to them because they have
20 the technological and financial means to avoid the risks of harm to Plaintiff.

21 293. Each Defendant owed a heightened duty of care to youth users of its app because
22 children's brains are not fully developed, meaning young people are more neurologically
23 vulnerable than adults to abusive contact facilitated by Defendants' apps because they have a hard
24 time distinguishing between patterns of genuine friendship and grooming relationships.

25 294. Each Defendant breached its duties of care owed to Plaintiff through its affirmative
26 malfeasance, actions, business decisions, and policies in the development, set up, management,
27 maintenance, operation, marketing, advertising, promotion, supervision, and control of its
28 respective app. These breaches are based on Defendants' own actions in managing their own apps

1 made available to the public, independent of any actions taken by a third party. Those breaches
2 include but are not limited to:

- 3 a. Including features in their apps that, as described above, are currently structured
4 and operated in a manner that unreasonably creates or increases the foreseeable
5 risk of grooming, sexual abuse, and sexual exploitation to youth, including
6 Plaintiff;
- 7 b. Including features in their apps that, as described above, are currently structured
8 and operated in a manner that unreasonably creates or increases the foreseeable
9 risk of harm to the physical and mental health and well-being of youth users,
10 including Plaintiff, including but not limited to physical injury, damage to self-
11 worth, stigma and social isolation, reduced academic performance, increased
12 risky behavior, susceptibility to future sexual exploitation, attachment issues,
13 identity confusion, and profound mental health issues for young consumers,
14 including but not limited to depression, anxiety, suicidal ideation, self-harm,
15 post-traumatic stress disorder, insomnia, eating disorders, death, and other
16 harmful effects;
- 17 c. Maintaining unreasonably dangerous features in their apps after notice that such
18 features, as structured and operated, posed a foreseeable risk of harm to the
19 physical and mental health and well-being of youth users;
- 20 d. Facilitating unsupervised and/or hidden use of their respective apps by youth,
21 including by adopting protocols that allow youth users to change their own
22 safety settings or parental controls, and create multiple and private accounts; and
- 23 e. Inviting young children on their apps and marketing to young children when
24 Defendants knew that the apps, as designed, were not safe for young children.

25 295. Each Defendant breached its duties of care owed to Plaintiff through its
26 nonfeasance, failure to act, and omissions in the development, setup, management, maintenance,
27 operation, marketing, advertising, promotion, supervision, and control of its respective app. These
28 breaches are based on Defendants' own actions in managing their own apps made available to the

1 public, independent of any actions taken by a third party. Those breaches include but are not limited
2 to:

- 3 a. Failing to implement effective parental controls;
 - 4 b. Failing to screen users before allowing them on the apps;
 - 5 c. Failing to implement effective parental notifications, such as when a child
6 messages another user, particularly an adult user, or when a child interacts with
7 accounts that have been blocked by other users or suspended in the past;
 - 8 d. Failing to require adult users to provide a phone number when signing up for an
9 account;
 - 10 e. Failing to implement pop-up safety notices within chats and games to warn users
11 about inappropriate behavior;
 - 12 f. Failing to ban IP and MAC addresses of accounts associated with known
13 abusers;
 - 14 g. Failing to set default safety settings to the most protective options;
 - 15 h. Having an open chat function;
 - 16 i. Failing to provide a transcript of a child's communications to the parent;
 - 17 j. Failing to implement reasonably available means to monitor for, report, and
18 prevent the use of their apps by sexual predators to victimize, abuse, and exploit
19 youth users;
 - 20 k. Failing to provide effective mechanisms for youth users and their
21 parents/guardians to report abuse or misuse of their apps;
 - 22 l. Failing to implement effective protocols to verify ages and identity of all users;
 - 23 m. Failing to place reasonable age restrictions on the apps;
 - 24 n. Failing to separate adults from children on the apps by, for example, creating
25 separate apps for children;
 - 26 o. Failing to adequately fund their trust and safety programs; and
 - 27 p. Others as set forth herein.
- 28

1 296. A reasonable company under the same or similar circumstances as Defendants
2 would have developed, set up, managed, maintained, supervised, and operated its app in a manner
3 that is safer for and more protective of youth users like Plaintiff.

4 297. At all relevant times, Plaintiff used each Defendant's app in the manner in which it
5 was intended to be used.

6 298. As a direct and proximate result of each Defendant's breach of one or more of its
7 duties, Plaintiff was harmed. Such harms include the sexual exploitation of Plaintiff by a child
8 predator and a cascade of resulting negative effects, including but not limited to damage to self-
9 worth, stigma and social isolation, reduced academic performance, increased risky behavior,
10 susceptibility to future sexual exploitation, attachment issues, identity confusion, and profound
11 mental health issues such as depression, anxiety, and other harmful effects.

12 299. Each Defendant's breach of one or more of its duties was a substantial factor in
13 causing harms and injuries to Plaintiff.

14 300. Plaintiff was injured from using both of Defendants' defective apps through no fault
15 of her own. The fact that Plaintiff was injured by using both of Defendants' apps means that
16 Defendants are each jointly and severally responsible for the injuries caused by any one of
17 Defendants' apps and the burden shifts to Defendants to identify alternative causes of the alleged
18 injuries and apportion responsibility for the alleged injuries.

19 301. The nature of the fraudulent and unlawful acts that created safety concerns for
20 Plaintiff are not the type of risks that are immediately apparent from using Defendants' apps.

21 302. Each Defendant's conduct, as described above, was intentional, willful, wanton,
22 reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and displayed an entire want
23 of care and a conscious and depraved indifference to the consequences of their conduct, including
24 to the health, safety, and welfare of their customers, and warrants an award of punitive damages in
25 an amount sufficient to punish the Defendants and deter others from like conduct.

26 303. Plaintiff demands judgment against each Defendant for compensatory and punitive
27 damages, together with interest, costs of suit, attorneys' fees, and all such other relief as the Court
28 deems proper.

FOURTH CAUSE OF ACTION

NEGLIGENCE – FAILURE TO WARN

(By Plaintiff Against Each Defendant)

304. Plaintiff incorporates each and every factual allegation set forth above.

305. This claim is brought against Defendants Roblox and Discord.

306. At all relevant times, each Defendant designed, developed, managed, operated, tested, produced, labeled, marketed, advertised, promoted, controlled, sold, supplied, distributed, and benefited from its app used by Plaintiff.

307. Plaintiff was a foreseeable user of each Defendant's app.

308. Each Defendant knew, or by the exercise of reasonable care, should have known, that use of its app was dangerous, harmful, and injurious when used in a reasonably foreseeable manner by minors.

309. Each Defendant knew, or by the exercise of reasonable care, should have known, that ordinary minor users, such as Plaintiff, would not have realized the potential risks and dangers of its app, including a risk of grooming, sexual abuse, and sexual exploitation, which can lead to a cascade of harms. Those harms include but are not limited to physical injury, damage to self-worth, stigma and social isolation, reduced academic performance, increased risky behavior, susceptibility to future sexual exploitation, attachment issues, identity confusion, and profound mental health issues for young consumers, including but not limited to depression, anxiety, suicidal ideation, self-harm, post-traumatic stress disorder, insomnia, death, and other harmful effects.

310. Had Plaintiff received proper or adequate warnings about the risks of each Defendant's app, Plaintiff would have heeded such warnings.

311. Each Defendant knew or, by the exercise of reasonable care, should have known that its app posed risks of harm to youth. These risks were known and knowable in light of Defendants' own internal data and knowledge regarding their apps at the time of development, design, marketing, promotion, advertising, and distribution to Plaintiff.

312. Because Defendants' conduct created the risk that child users of their apps would be subject to grooming, sexual abuse, and sexual exploitation, Defendants each owed a duty to all

1 reasonably foreseeable users, including but not limited to minor users and their parents, to provide
2 adequate warnings about the risk of using Defendants' apps that were known to Defendants, or that
3 Defendants should have known through the exercise of reasonable care.

4 313. In addition, as described above, each Defendant owed a special relationship duty to
5 Plaintiff to protect her against harm caused by its app and employees or by other users.

6 314. Each Defendant owed a heightened duty of care to minor users and their parents to
7 warn about its app's risks because children's brains are not fully developed, resulting in a
8 diminished capacity to make responsible decisions regarding contact with strangers online.
9 Children are also more neurologically vulnerable than adults to abusive contact facilitated by
10 Defendants' apps because they have a hard time distinguishing between patterns of genuine
11 friendship and grooming relationships.

12 315. Each Defendant breached its duty by failing to use reasonable care in providing
13 adequate warnings to Plaintiff, such as failing to notify parents and the general public of the
14 following, among others:

- 15 a. Defendants fail to require that children have parental approval before signing up
16 for an account;
- 17 b. Defendants fail to screen users before allowing them on the apps;
- 18 c. New users of Defendants' apps can identify themselves as minors, begin to use
19 the app, and do so indefinitely, without ever receiving a safety warning, and
20 without ever having to provide information so that Defendants can warn the
21 users' parents or guardians;
- 22 d. Defendants' apps' default safety settings allow adults and other strangers'
23 accounts to find, "friend," and communicate with children's accounts;
- 24 e. Defendants' parental control settings allowed children to modify their own
25 parental control settings;
- 26 f. Defendants' platforms recommend that adult users and other strangers "friend"
27 and contact child accounts;
- 28 g. Defendants fail to block the IP and MAC addresses of known abusers;

- h. Adult predators use Defendants' apps to target children for sexual exploitation, sextortion, and CSAM;
- i. Defendants' apps enable and increase risk of exposure to predators and can result in grooming, sexual abuse, and sexual exploitation, as well as their resultant physical and mental injuries;
- j. Sexual predators use Robux to coerce children into sending them nude photos or engaging in other types of sexually explicit behavior;
- k. Usage of Defendants' apps can increase risky and uninhibited behavior in children, making them easier targets to adult predators for sexual exploitation, sextortion, and CSAM;
- l. Usage of Defendants' apps can normalize abuse and pornography, leading children to abuse other children either contemporaneously or later when the children are older;
- m. The likelihood and severity of harm is greater for children;
- n. The likelihood and intensity of these harmful effects is exacerbated by the interaction of each app's features with one another;
- o. Defendants fail to verify ages, allowing adult predators to pose as children on Defendants' apps; and
- p. Others as set forth herein.

316. A reasonable company under the same or similar circumstances as Defendants would have used reasonable care to provide adequate warnings to consumers, including the parents of minor users, as described herein.

317. At all relevant times, each Defendant could have provided adequate warnings to prevent the harms and injuries described herein.

318. As a direct and proximate result of each Defendant's breach of its duty to provide adequate warnings, Plaintiff was harmed and sustained the injuries set forth herein. Each Defendant's failure to provide adequate and sufficient warnings was a substantial factor in causing the harms to Plaintiff.

1 327. Each Defendant knew or, by the exercise of reasonable care, should have known,
2 that its app was dangerous, harmful, and injurious when used by youth in a reasonably foreseeable
3 manner.

4 328. Each Defendant knew or, by the exercise of reasonable care, should have known
5 that its respective app posed risks of harm to youth. These risks were known and knowable in light
6 of Defendants' own internal data and knowledge regarding their apps at the time of the apps'
7 development, design, marketing, promotion, advertising, and distribution to Plaintiff.

8 329. Each Defendant knew, or by the exercise of reasonable care, should have known,
9 that ordinary minor consumers such as Plaintiff would not have realized the potential risks and
10 dangers of its app. Those risks include grooming, sexual abuse, and sexual exploitation, which can
11 lead to a cascade of negative effects, including but not limited to physical injury, damage to self-
12 worth, stigma and social isolation, reduced academic performance, increased risky behavior,
13 susceptibility to future sexual exploitation, attachment issues, identity confusion, and profound
14 mental health issues for young consumers, including but not limited to depression, anxiety, suicidal
15 ideation, self-harm, post-traumatic stress disorder, insomnia, death, and other harmful effects.

16 330. Each Defendant owed a duty to all reasonably foreseeable users to design a safe app.

17 331. Each Defendant owed a heightened duty of care to minor users of its app because
18 children's brains are not fully developed, resulting in a diminished capacity to make responsible
19 decisions regarding contact with strangers online. Children are also more neurologically vulnerable
20 than adults to abusive contact facilitated by Defendants' apps because they have a hard time
21 distinguishing between patterns of genuine friendship and grooming relationships.

22 332. Plaintiff was a foreseeable user of each Defendant's app.

23 333. Each Defendant knew that minors such as Plaintiff would use its app.

24 334. Each Defendant breached its respective duty in designing its app.

25 335. Each Defendant breached its respective duty by failing to use reasonable care in the
26 design of its app by negligently designing the app with features that specifically allow predators to
27 find, groom, exploit, and abuse children, as described herein.

1 336. Each Defendant breached its respective duty by designing an app that was less safe
2 to use than an ordinary consumer would expect when used in an intended and reasonably
3 foreseeable manner.

4 337. Each Defendant breached its respective duty by failing to use reasonable care in the
5 design of its app by negligently designing its app with features as described above that created or
6 increased the risk of grooming, sexual abuse, and sexual exploitation for children, which can lead
7 to a cascade of negative effects, including but not limited to physical injury, damage to self-worth,
8 stigma and social isolation, reduced academic performance, increased risky behavior, susceptibility
9 to future sexual exploitation, attachment issues, identity confusion, and profound mental health
10 issues for young consumers, including but not limited to depression, anxiety, suicidal ideation, self-
11 harm, post-traumatic stress disorder, insomnia, death, and other harmful effects.

12 338. Each Defendant breached its respective duty by failing to use reasonable care to use
13 cost-effective, reasonably feasible alternative designs, including changes to the harmful features,
14 and other safety measures, to minimize the harms described herein, including but not limited to:

- 15 a. Requiring children have parental approval and a parent's email address to sign-
16 up for an account;
- 17 b. Effective parental controls;
- 18 c. Effective parental notifications, including notifying parents any time a child
19 messages another user, particularly an adult user, or notifying parents when
20 children interact with accounts that have been blocked by other users or
21 suspended in the past, among other controls;
- 22 d. Setting default safety settings to the most protective options, including blocking
23 direct messaging between child and adult users, or only allowing messaging
24 between adult users and a child with the parent's explicit permission to message
25 the adult user;
- 26 e. Requiring adults to provide a phone number when signing up for an account;
- 27 f. Pop-up safety notices within chats and games to warn users about inappropriate
28 behavior;

- g. Preventing strangers from sending Robux to child accounts, and preventing children from sending Robux to strangers' accounts;
- h. Banning IP and MAC addresses of accounts associated with known abusers;
- i. Controlled chat option;
- j. Providing a transcript of a child's communications to the parent;
- k. Implementing reporting protocols to allow users or visitors of Defendants' apps to report CSAM and adult predator accounts specifically without the need to create or log in to the apps prior to reporting;
- l. Robust age and identity verification;
- m. Reasonable age restrictions;
- n. Separating adults from children by, for example, creating separate apps for children; and
- o. Others as set forth herein.

339. Alternative designs that would reduce the dangerous features of Defendants' respective apps were available, would have served effectively the same purpose as Defendants' defectively designed apps, and would have reduced the gravity and severity of danger each Defendant's app posed minor Plaintiffs.

340. A reasonable company under the same or similar circumstances as each Defendant would have designed a safer app.

341. At all relevant times, Plaintiff used each Defendant's app in the manner in which it was intended by each Defendant to be used.

342. As a direct and proximate result of each Defendant's breached duties, Plaintiff was harmed. Each Defendant's design of its respective app was a substantial factor in causing Plaintiff's harms and injuries.

343. Plaintiff was injured from using both of Defendants' defective apps through no fault of her own. The fact that Plaintiff was injured by using both of Defendants' apps means that Defendants are each jointly and severally responsible for the injuries caused by any one of

1 Defendants' apps and the burden shifts to Defendants to identify alternative causes of the alleged
2 injuries and apportion responsibility for the alleged injuries.

3 344. The nature of the fraudulent and unlawful acts that created safety concerns for
4 Plaintiff are not the type of risks that are immediately apparent from using each Defendant's app.

5 345. The conduct of each Defendant, as described above, was intentional, willful,
6 wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and displayed an
7 entire want of care and a conscious and depraved indifference to the consequences of its conduct,
8 including to the health, safety, and welfare of its customers, and warrants an award of punitive
9 damages in an amount sufficient to punish each Defendant and deter others from like conduct.

10 346. Plaintiff demands judgment against each Defendant for compensatory and punitive
11 damages, together with interest, costs of suit, attorneys' fees, and all such other relief as the Court
12 deems proper.

13 **SIXTH CAUSE OF ACTION**

14 **NEGLIGENT UNDERTAKING**

15 **(By Plaintiff Against Roblox)**

16 347. Plaintiff incorporates each and every factual allegation set forth above.

17 348. This claim is brought against Defendant Roblox.

18 349. Defendant Roblox rendered parental control services and account safety services to
19 Plaintiff's parents, including Plaintiff's mother.

20 350. Defendant Roblox made numerous statements, as outlined above, claiming in
21 substance that its parental controls and account safety services were highly effective at protecting
22 users from the types of harm that Plaintiff suffered.

23 351. Defendant Roblox knew, or reasonably should have known, that effective parental
24 control and account safety services were necessary for the protection of minor users.

25 352. Defendant Roblox's conduct was closely connected to Plaintiff's injuries, which
26 were highly certain to occur, as evidenced by the significance of Plaintiff's injuries.

27 353. Defendant Roblox could have avoided Plaintiff's injuries with minimal cost,
28 including, for example, by implementing parental control and account safety services that were

1 effective and that would prevent child users from being contacted by adult accounts or strangers'
2 accounts generally.

3 354. Imposing a duty on Defendant Roblox would benefit the community at large.

4 355. Imposing a duty on Defendant Roblox would not be burdensome to them because
5 they have the technological and financial means to avoid the risks of harm to children.

6 356. Defendant Roblox owed a heightened duty of care to minor users and their parents
7 to implement parental control and account safety services that were effective and that would
8 prevent child users from being contacted by adult accounts or strangers' accounts generally.

9 357. Plaintiff's mother relied on Defendant Roblox exercising reasonable care in
10 undertaking to render parental control and account safety services.

11 358. Defendant Roblox breached its duty of undertaking by failing to use reasonable care
12 in rendering its parental control and account safety services to prevent child users from being
13 contacted by adult accounts or strangers' accounts generally.

14 359. Defendant Roblox failed to exercise reasonable care in rendering these parental
15 control and account safety services.

16 360. Defendant Roblox's failure to exercise reasonable care increased the risk of and was
17 a substantial factor in causing harm to Plaintiff.

18 361. Plaintiff was harmed by her mother's reliance on Defendant to provide effective
19 parental control and account safety services.

20 362. Defendant's breach of one or more of its duties was a substantial factor in causing
21 harms and injuries to Plaintiff.

22 363. The nature of the fraudulent and unlawful acts that created safety concerns for
23 Plaintiff are not the type of risks that are immediately apparent from using Defendants' apps.

24 364. The conduct of Defendant Roblox, as described above, was intentional, willful,
25 wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and displayed an
26 entire want of care and a conscious and depraved indifference to the consequences of its conduct,
27 including to the health, safety, and welfare of its customers, and warrants an award of punitive
28 damages.

1 365. Plaintiff demands judgment against Defendant Roblox for compensatory and
2 punitive damages, together with interest, costs of suit, attorneys' fees, and all such other relief as
3 the Court deems proper.

4 **SEVENTH CAUSE OF ACTION**

5 **STRICT LIABILITY – DESIGN DEFECT**

6 **(By Plaintiff Against Each Defendant)**

7 366. Plaintiff incorporates each and every factual allegation set forth above.

8 367. This claim is brought against Defendants Roblox and Discord.

9 368. At all relevant times, each Defendant designed, developed, managed, operated,
10 tested, produced, labeled, marketed, advertised, promoted, controlled, sold, supplied, distributed,
11 and benefitted from its product used by Plaintiff.

12 369. These products were designed, manufactured, maintained, controlled, and
13 distributed from the respective California headquarters of each Defendant.

14 370. Each Defendant's product was designed and intended to be a gaming and/or
15 communication product. The software and architecture of each product is the same for every user
16 that logs on or signs up for an account. These products are uniformly defective and pose the same
17 danger to each minor user.

18 371. Each Defendant's product is distributed and sold to the public through retail
19 channels (*e.g.*, the Apple App "Store" and the Google Play "Store").

20 372. Each Defendant's product is marketed and advertised to the public for the personal
21 use of the end-user/consumer.

22 373. Each Defendant defectively designed its product to allow children to come into
23 contact with child predators. Children are particularly unable to appreciate the risks posed by the
24 products.

25 374. The defects in the design of each Defendant's product existed prior to the release of
26 these products to Plaintiff and the public, and there was no substantial change to Defendants'
27 products between the time of their upload by each Defendant to public or retail channels (*e.g.*, the
28

1 App Store or Google Play) and the time of their distribution to Plaintiff via download or URL
2 access.

3 375. Plaintiff used these products as intended, and each Defendant knew or, by the
4 exercise of reasonable care, should have known that Plaintiff would use these products without
5 inspection for its dangerous nature.

6 376. Each Defendant defectively designed its product to appeal to adult predators by
7 making it easy to find children and enabled their contact, grooming, sexual exploitation, and sexual
8 abuse of children, including Plaintiff.

9 377. Each Defendant failed to test the safety of the features it developed and implemented
10 for use on its product. When each Defendant did perform some product testing and had knowledge
11 of ongoing harm, it failed to adequately remedy its product's defects or warn Plaintiff.

12 378. Each Defendant's product is defective in design and poses a substantial likelihood
13 of harm for the reasons set forth herein, because the products fail to meet the safety expectations
14 of ordinary consumers when used in an intended or reasonably foreseeable manner, and because
15 the products are less safe than an ordinary consumer would expect when used in such a manner.
16 Children and teenagers are among the ordinary consumers of Defendants' products. Indeed, each
17 Defendant markets, promotes, and advertises its respective product to pre-teen and young
18 consumers. Pre-teen and young consumers, and their parents and guardians, do not expect
19 Defendants' products to expose them to predators when the products are used in their intended
20 manner by their intended audience. They do not expect the features embedded by Defendants in
21 their products to make it easy for child predators to sign-up for accounts and find children, groom
22 children, and sexually exploit children. They do not expect Defendants' revenue and profits to be
23 directly tied to predators' extortion of children.

24 379. Each Defendant's product is likewise defectively designed in that it creates an
25 inherent risk of danger; specifically, a risk of grooming, sexual abuse, and sexual exploitation,
26 which can lead to a cascade of harms. Those harms include but are not limited to physical injury,
27 damage to self-worth, stigma and social isolation, reduced academic performance, increased risky
28 behavior, susceptibility to future sexual exploitation, attachment issues, identity confusion, and

1 profound mental health issues for young consumers, including but not limited to depression,
2 anxiety, suicidal ideation, self-harm, post-traumatic stress disorder, insomnia, death, and other
3 harmful effects.

4 380. The risks inherent in the design of each Defendant's product significantly outweigh
5 any benefits of such design.

6 381. Defendants could have utilized cost-effective, reasonably feasible alternative
7 designs, including changes to the problematic features described above, to minimize the harms
8 described herein, including, but not limited to:

- 9 a. Requiring children have parental approval and a parent's email address to sign-
10 up for an account;
- 11 b. Effective parental controls;
- 12 c. Effective parental notifications, including notifying parents any time a child
13 messages another user, particularly an adult user, or notifying parents when
14 children interact with accounts that have been blocked by other users or
15 suspended in the past, among other controls;
- 16 d. Setting default safety settings to the most protective options, including blocking
17 direct messaging between child and adult users, or only allowing messaging
18 between adult users and a child with the parent's explicit permission to message
19 the adult user;
- 20 e. Requiring adults to provide a phone number when signing up for an account;
- 21 f. Pop-up safety notices within chats and games to warn users about inappropriate
22 behavior;
- 23 g. Preventing strangers from sending Robux to child accounts, and preventing
24 children from sending Robux to strangers' accounts;
- 25 h. Banning IP and MAC addresses of accounts associated with known abusers;
- 26 i. Controlled chat option;
- 27 j. Providing a transcript of a child's communications to the parent;
- 28

- k. Implementing reporting protocols to allow users or visitors of Defendants' products to report child sex abuse material and adult predator accounts specifically without the need to create or log in to the products prior to reporting;
- l. Robust age and identity verification;
- m. Reasonable age restrictions;
- n. Separating adults from children by, for example, creating separate apps for children; and
- o. Others as set forth herein.

382. Alternative designs were available that would prevent child predators from finding, grooming, and exploiting children, and which would have served effectively the same purpose of Defendants' products while reducing the gravity and severity of danger posed by those products' defects.

383. Plaintiff used Defendants' respective products as intended or in reasonably foreseeable ways.

384. The physical, emotional, and economic injuries of Plaintiff were reasonably foreseeable to Defendants at the time of their products' development, design, advertising, marketing, promotion, and distribution.

385. Each Defendant's product was defective and unreasonably dangerous when it left each Defendant's respective possession and control. The defects continued to exist through the products' distribution to and use by consumers, including Plaintiff, who used the products without any substantial change in the products' condition.

386. As manufacturers, designers and sellers, each Defendant had a duty to inform themselves with the best knowledge of the risks and the defects of its product and each Defendant had such knowledge. Their victims, including Plaintiff, were powerless to protect themselves against unknown harms, and Defendants should bear the costs of their injuries.

387. Plaintiff was injured as a direct and proximate result of each Defendant's respective defective designs as described herein. The defective design of the products used by Plaintiff was a substantial factor in causing harms to Plaintiff.

1 388. As a direct and proximate result of each Defendant's respective product's defective
2 design, Plaintiff suffered serious and dangerous injuries.

3 389. As a direct and proximate result of each Defendant's product's defective design,
4 Plaintiff requires and/or will require more healthcare and services and did incur medical, health,
5 incidental, and related expenses.

6 390. Plaintiff was injured from using both of Defendants' defective products through no
7 fault of her own. The fact that Plaintiff was injured by using both of Defendants' products means
8 that Defendants are each jointly and severally responsible for the injuries caused by any one of
9 Defendants' products and the burden shifts to Defendants to identify alternative causes of the
10 alleged injuries and apportion responsibility for the alleged injuries.

11 391. The nature of the fraudulent and unlawful acts that created safety concerns for
12 Plaintiff are not the type of risks that are immediately apparent from using Defendants' respective
13 products.

14 392. The conduct of each Defendant, as described above, was intentional, willful,
15 wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and displayed an
16 entire want of care and a conscious and depraved indifference to the consequences of its conduct,
17 including to the health, safety, and welfare of its customers, and warrants an award of punitive
18 damages in an amount sufficient to punish each Defendant and deter others from like conduct.

19 393. Plaintiff demands judgment against each Defendant for compensatory and punitive
20 damages, together with interest, costs of suit, attorneys' fees, and all such other relief as the Court
21 deems proper

22 **EIGHTH CAUSE OF ACTION**

23 **STRICT LIABILITY – FAILURE TO WARN**

24 **(By Plaintiff Against Each Defendant)**

25 394. Plaintiff incorporates each and every factual allegation set forth above.

26 395. This claim is brought against Defendants Roblox and Discord.

1 396. At all relevant times, each Defendant designed, developed, managed, operated,
2 tested, produced, labeled, marketed, advertised, promoted, controlled, sold, supplied, distributed,
3 and benefitted from its product used by Plaintiff.

4 397. These products were designed, manufactured, maintained, controlled and
5 distributed from the respective California headquarters of each Defendant.

6 398. Each Defendant's product was designed and intended to be a gaming and/or
7 communication product. The software and architecture of each product is the same for every user
8 that logs on or signs up for an account. These products are uniformly defective and pose the same
9 danger to each minor user.

10 399. Each Defendant's product is distributed and sold to the public through retail
11 channels (*e.g.*, the Apple App "Store" and the Google Play "Store").

12 400. Each Defendant sold and distributed its respective product to Plaintiff in a defective
13 and unreasonably dangerous condition by failing to adequately warn about the risk of harm to youth
14 as described herein, including a risk of grooming, sexual abuse, and sexual exploitation, which can
15 lead to a cascade of harms. Those harms include but are not limited to physical injury, damage to
16 self-worth, stigma and social isolation, reduced academic performance, increased risky behavior,
17 susceptibility to future sexual exploitation, attachment issues, identity confusion, and profound
18 mental health issues for young consumers including but not limited to depression, anxiety, suicidal
19 ideation, self-harm, post-traumatic stress disorder, insomnia, death, and other harmful effects.

20 401. Defendants were in the best position to know the dangers their products posed to
21 consumers, including Plaintiff, as they had superior knowledge of the risks and dangers posed by
22 their products and had exclusive knowledge of these risks at the time of development, design,
23 marketing, promotion, advertising and distribution. Defendants had exclusive control of their
24 products at all times relevant to this litigation.

25 402. Each Defendant's respective product is dangerous, to an extent beyond that
26 contemplated by the ordinary user who used Defendants' products, because they enable predators
27 to find, groom, abuse, and exploit children.
28

1 403. Each Defendant knew or, by the exercise of reasonable care, should have known
2 that its respective product posed risks of harm to youth considering its own internal data and
3 knowledge regarding its product at the time of development, design, marketing, promotion,
4 advertising, and distribution.

5 404. These risks were known and knowable in light of Defendants' own internal data and
6 knowledge regarding their products at the time of the products' development, design, marketing,
7 promotion, advertising, and distribution to Plaintiff.

8 405. Defendants' products are defective and unreasonably dangerous because, among
9 other reasons described herein, each Defendant failed to exercise reasonable care to inform users
10 that, among other things:

- 11 a. Sexual predators use Defendants' products to find, contact, groom and abuse
12 children with alarming frequency;
- 13 b. Sexual predators use Defendants' products to solicit, produce, and distribute
14 CSAM with alarming frequency;
- 15 c. Sexual predators target young children for CSAM on Defendants' products with
16 alarming frequency;
- 17 d. Sexual predators use Robux to coerce children into sending them nude photos
18 or engaging in other types of sexually explicit behavior;
- 19 e. Defendants' products are designed in a way that enables and increases risk of
20 exposure to predators and resulting sexual exploitation;
- 21 f. Defendants' products cause grooming, sexual abuse, and sexual exploitation,
22 and its resultant physical and mental injuries;
- 23 g. Use of Defendants' products can increase risky and uninhibited behavior in
24 children, making them easier targets to adult predators for sexual exploitation,
25 sextortion, and CSAM;
- 26 h. Use of Defendants' products can normalize abuse and pornography, leading
27 children to abuse other children either contemporaneously or later when the
28 children are older;

- i. New users of Defendants' product can identify themselves as minors, begin to use the product, and do so indefinitely, without ever receiving a safety warning, and without ever having to provide information so that Defendants can warn the users' parents or guardians;
- j. The likelihood and severity of harms is greater for children;
- k. The likelihood and intensity of these harmful effects is exacerbated by the interaction of each product's features with one another; and
- l. Others as set forth herein.

406. Plaintiff was a foreseeable user of each Defendant's product.

407. Ordinary minor users would not have recognized the potential risks of Defendants' products when used in a manner reasonably foreseeable to Defendants.

408. Had Plaintiff received proper or adequate warnings or instructions as to the risks of using each Defendant's product, Plaintiff would have heeded the warnings and/or followed the instructions.

409. Each Defendant's failures to adequately warn Plaintiff about the risks of their defective products were a proximate cause and a substantial factor in the injuries sustained by Plaintiff.

410. Plaintiff was injured from using both of Defendants' defective products through no fault of her own. The fact that Plaintiff was injured by using both of Defendants' products means that Defendants are each jointly and severally responsible for the injuries caused by any one of Defendants' products and the burden shifts to Defendants to identify alternative causes of the alleged injuries and apportion responsibility for the alleged injuries.

411. The nature of the fraudulent and unlawful acts that created safety concerns for Plaintiff are not the type of risks that are immediately apparent from using Defendants' products.

412. The conduct of each Defendant, as described above, was intentional, fraudulent, willful, wanton, reckless, malicious, oppressive, extreme, and outrageous, and displayed an entire want of care and a conscious and depraved indifference to the consequences of its conduct,

1 including to the health, safety, and welfare of their customers, and warrants an award of punitive
2 damages in an amount sufficient to punish each Defendant and deter others from like conduct.

3 413. Plaintiff demands judgment against each Defendant for compensatory and punitive
4 damages, together with interest, costs of suit, attorneys' fees, and all such other relief as the Court
5 deems proper.

6 **VIII. PRAYER FOR RELIEF**

7 WHEREFORE, Plaintiff demands judgment against Defendants for the above-referenced
8 claims and causes of action, and as follows:

- 9 1. Past, present, and future general damages, the exact amount of which has yet to be
10 ascertained, in an amount which will confirm to proof at time of trial, to compensate
11 Plaintiff for injuries sustained as a result of the use of each Defendant's product,
12 including but not limited to physical pain and suffering, mental anguish, loss of
13 enjoyment of life, emotional distress, and expenses for medical treatments;
- 14 2. Past, present, and future economic and special damages, according to proof at the
15 time of trial;
- 16 3. Impaired earning capacity according to proof at the time of trial;
- 17 4. Medical expenses, past and future, according to proof at the time of trial;
- 18 5. Punitive or exemplary damages according to proof at the time of trial;
- 19 6. Attorneys' fees;
- 20 7. For costs of suit incurred herein;
- 21 8. Pre-judgment and post-judgment interest as provided by law; and
- 22 9. For such other and further relief as the Court may deem just and proper.

23 **IX. DEMAND FOR A JURY TRIAL**

24 Plaintiff hereby demands a trial by jury on all claims so triable.

26 Date: October 1, 2025

Respectfully submitted,

27 **ANAPOL WEISS**

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**Pro Hac Vice* motions forthcoming

I. PLAINTIFF(S)

Mary Doe, as next friend of minor plaintiff Jane Doe

County of Residence of First Listed Plaintiff:
Leave blank in cases where United States is plaintiff. Brevard County, FL

Attorney or Pro Se Litigant Information (Firm Name, Address, and Telephone Number)

Paige Boldt, Esquire, Anapol Weiss, (215) 608-9645
130 N 18th Street, Suite 1600, Philadelphia, PA 19103

DEFENDANT(S)

Roblox Corporation; Discord Inc

County of Residence of First Listed Defendant:
Use ONLY in cases where United States is plaintiff.

Defendant's Attorney's Name and Contact Information (if known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

☐ U.S. Government Plaintiff

☐ Federal Question (U.S. Government Not a Party)

☐ U.S. Government Defendant

☒ Diversity

III. CAUSE OF ACTION

Cite the U.S. Statute under which you are filing: (Use jurisdictional statutes only for diversity)

28 U.S.C. § 1332(a)

Brief description of case:

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<div><input type="checkbox"/> 110 Insurance</div> <div><input type="checkbox"/> 120 Marine</div> <div><input type="checkbox"/> 130 Miller Act</div> <div><input type="checkbox"/> 140 Negotiable Instrument</div> <div><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</div> <div><input type="checkbox"/> 151 Medicare Act</div> <div><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)</div> <div><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</div> <div><input type="checkbox"/> 160 Stockholders' Suits</div> <div><input type="checkbox"/> 190 Other Contract</div> <div><input type="checkbox"/> 195 Contract Product Liability</div> <div><input type="checkbox"/> 196 Franchise</div>	<div><div>PERSONAL INJURY</div><div><input type="checkbox"/> 310 Airplane</div><div><input type="checkbox"/> 315 Airplane Product Liability</div><div><input type="checkbox"/> 320 Assault, Libel & Slander</div><div><input type="checkbox"/> 330 Federal Employers' Liability</div><div><input type="checkbox"/> 340 Marine</div><div><input type="checkbox"/> 345 Marine Product Liability</div><div><input type="checkbox"/> 350 Motor Vehicle</div><div><input type="checkbox"/> 355 Motor Vehicle Product Liability</div><div><input type="checkbox"/> 360 Other Personal Injury</div><div><input type="checkbox"/> 362 Personal Injury -Medical Malpractice</div><div>CIVIL RIGHTS</div><div><input type="checkbox"/> 440 Other Civil Rights</div><div><input type="checkbox"/> 441 Voting</div><div><input type="checkbox"/> 442 Employment</div><div><input type="checkbox"/> 443 Housing/ Accommodations</div><div><input type="checkbox"/> 445 Amer. w/Disabilities Employment</div><div><input type="checkbox"/> 446 Amer. w/Disabilities Other</div><div><input type="checkbox"/> 448 Education</div></div> <div><div>PERSONAL INJURY</div><div><input checked="" type="checkbox"/> 365 Personal Injury Product Liability</div><div><input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability</div><div><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</div><div>PERSONAL PROPERTY</div><div><input type="checkbox"/> 370 Other Fraud</div><div><input type="checkbox"/> 371 Truth in Lending</div><div><input type="checkbox"/> 380 Other Personal Property Damage</div><div><input type="checkbox"/> 385 Property Damage Product Liability</div><div>PRISONER PETITIONS</div><div><input type="checkbox"/> 463 Alien Detainee</div><div><input type="checkbox"/> 510 Motions to Vacate Sentence</div><div><input type="checkbox"/> 530 General</div><div><input type="checkbox"/> 535 Death Penalty</div><div>OTHER</div><div><input type="checkbox"/> 540 Mandamus & Other</div><div><input type="checkbox"/> 550 Civil Rights</div><div><input type="checkbox"/> 555 Prison Condition</div><div><input type="checkbox"/> 560 Civil Detainee- Conditions of Confinement</div></div>			

V. ORIGIN (Place an "X" in One Box Only)

☒ Original Proceeding

☐ Removed from State Court

☐ Remanded from Appellate Court

☐ Reinstated or Reopened

☐ Transferred from Another District

☐ Multidistrict Litigation--Transfer

☐ Multidistrict Litigation--Direct File

VI. FOR DIVERSITY CASES ONLY: CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Plaintiff

Defendant

☐ Citizen of California

☒ Citizen of Another State

☐ Citizen or Subject of a Foreign Country

☒ Incorporated or Principal Place of Business In California

☐ Incorporated and Principal Place of Business In Another State

☐ Foreign Nation

VII. REQUESTED IN COMPLAINT

☒ Check if the complaint contains a jury demand.

☐ Check if the complaint contains a monetary demand. Amount:

☐ Check if the complaint seeks class action status under Fed. R. Civ. P. 23.

☐ Check if the complaint seeks a nationwide injunction or Administrative Procedure Act vacatur.

VIII. RELATED CASE(S) OR MDL CASE

Provide case name(s), number(s), and presiding judge(s).

IX. DIVISIONAL ASSIGNMENT pursuant to Civil Local Rule 3-2 (Place an "X" in One Box Only)

☒ SAN FRANCISCO/OAKLAND

☐ SAN JOSE

☐ EUREKA-MCKINLEYVILLE

COMPLETING THE CIVIL COVER SHEET

Complete the form as follows:

- I. Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.
Attorney/Pro Se Litigant Information. Enter the firm name, address, telephone number, and email for attorney of record or pro se litigant. If there are several individuals, list them on an attachment.
- II. Jurisdiction.** Under Federal Rule of Civil Procedure 8(a), pleadings must establish the basis of jurisdiction. If multiple bases for jurisdiction apply, prioritize them in the order listed:
 - (1) *United States plaintiff.* Jurisdiction based on 28 U.S.C. §§ 1345 and 1348 for suits filed by the United States, its agencies or officers.
 - (2) *United States defendant.* Applies when the United States, its agencies, or officers are defendants.
 - (3) *Federal question.* Select this option when jurisdiction is based on 28 U.S.C. § 1331 for cases involving the U.S. Constitution, its amendments, federal laws, or treaties (but use choices 1 or 2 if the United States is a party).
 - (4) *Diversity of citizenship.* Select this option when jurisdiction is based on 28 U.S.C. § 1332 for cases between citizens of different states and complete Section VI to specify the parties’ citizenship. Note: Federal question jurisdiction takes precedence over diversity jurisdiction.
- III. Cause of Action.** Enter the statute directly related to the cause of action and give a brief description of the cause. Do not cite jurisdictional statutes unless jurisdiction is based on diversity. Example: U.S. Civil Statute: 47 U.S.C. § 553. Brief Description: Unauthorized reception of cable service.
- IV. Nature of Suit.** Check one of the boxes. If the case fits more than one nature of suit, select the most definitive or predominant.
- V. Origin.** Check one of the boxes:
 - (1) *Original Proceedings.* Cases originating in the United States district courts.
 - (2) *Removed from State Court.* Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C. § 1441. When the petition for removal is granted, check this box.
 - (3) *Remanded from Appellate Court.* Check this box for cases remanded to the district court for further action, using the date of remand as the filing date.
 - (4) *Reinstated or Reopened.* Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - (5) *Transferred from Another District.* Check this box for cases transferred under Title 28 U.S.C. § 1404(a). Do not use this for within-district transfers or multidistrict litigation (MDL) transfers.
 - (6) *Multidistrict Litigation Transfer.* Check this box when a multidistrict (MDL) case is transferred into the district under authority of Title 28 U.S.C. § 1407.
 - (7) *Multidistrict Litigation Direct File.* Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket.
- VI. Residence (citizenship) of Principal Parties.** Mark for each principal party *only* if jurisdiction is based on diversity of citizenship.
- VII. Requested in Complaint.**
 - (1) *Jury demand.* Check this box if plaintiff’s complaint demanded a jury trial.
 - (2) *Monetary demand.* For cases demanding monetary relief, check this box and enter the actual dollar amount being demanded.
 - (3) *Class action.* Check this box if plaintiff is filing a class action under Federal Rule of Civil Procedure 23.
 - (4) *Nationwide injunction.* Check this box if plaintiff is seeking a nationwide injunction or nationwide vacatur pursuant to the Administrative Procedures Act.
- VIII. Related Cases.** If there are related pending case(s), provide the case name(s) and number(s) and the name(s) of the presiding judge(s). If a short-form MDL complaint is being filed, furnish the MDL case name and number.
- IX. Divisional Assignment.** Identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.” Note that case assignment is made without regard for division in the following case types: Property Rights (Patent, Trademark and Copyright), Prisoner Petitions, Securities Class Actions, Anti-Trust, Bankruptcy, Social Security, and Tax.