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

12  
13 MARY DOE, as next friend of minor  
14 plaintiff, JANE DOE,

15 Plaintiff,

16 v.

17 ROBLOX CORPORATION,

18 Defendant.  
19  
20

Case No.:3:25-cv-8399

**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” or  
2 “Defendant”) to recover damages arising from the severe injuries she suffered because of Roblox’s  
3 conduct in creating, designing, marketing, and distributing its mobile- and web-based application  
4 (“app”), and alleges as follows:

5 **I. INTRODUCTION**

6 1. This action seeks to hold Roblox accountable for recklessly and deceptively  
7 operating a business in a way that led directly to the sexual exploitation and abuse of Plaintiff, a  
8 minor who was groomed on Roblox’s app, lured away from her home, and raped by five different  
9 predators. The heinous acts against Plaintiff were committed by a dangerous child predator whose  
10 actions were possible only because of the egregiously tortious conduct of Roblox.

11 2. Through its pervasive pattern of misrepresentations about safety, Roblox portrays  
12 its app as a safe and appropriate place for children to play. In reality, and as Roblox well knows,  
13 the design of its app makes children easy prey for pedophiles, and Roblox had no appropriate  
14 safeguards to ensure that children were in fact safe or that predators were screened. There are steps  
15 Roblox could take to protect children and make its app safer. But time and again Roblox has refused  
16 to invest in basic safety features to protect against exactly the kind of exploitation Plaintiff suffered.

17 3. The reason for Roblox’s unlawful conduct is simple: Roblox prioritizes user growth  
18 over child safety. As one former Roblox employee explained in describing the company’s approach  
19 to child safety, “You have to make a decision, right? You can keep your players safe, but then it  
20 would be less of them on the platform. Or you just let them do what they want to do. And then the  
21 numbers all look good and investors will be happy.”<sup>1</sup> Roblox’s prioritization of growth over the  
22 safety of children has devastated the lives of children who use its app, including Plaintiff.

23 4. Plaintiff was an avid user of Roblox who relied heavily on the app for social  
24 interaction, making her a prime target for the countless child predators that Roblox knew were  
25 freely roaming the app looking for vulnerable children. Plaintiff was targeted on Roblox by a serial  
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27 <sup>1</sup> *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, Hindenburg  
28 Research (Oct. 8, 2024), <https://hindenburesearch.com/roblox/>.

1 predator who engaged in textbook grooming behavior that Roblox has known about for years. But  
2 instead of taking actions to address this major problem, which would have reduced the number of  
3 users on its app, Roblox misleadingly claimed to be providing a safe environment, then deliberately  
4 chose to do nothing to provide any meaningful safeguards to actually protect children on its app.

5         5. The predator targeted Plaintiff via Roblox's messaging chat, initially engaging in  
6 innocent conversations but gradually escalating to sexual topics and sexual exchanges. Once the  
7 predator had sufficiently groomed Plaintiff via Roblox's app, he began sending her sexually explicit  
8 photos of his penis. Eventually, the predator escalated his predation to an even more disturbing  
9 level, convincing her to send him sexually explicit images of herself. Ultimately, the predator  
10 coerced Plaintiff into leaving her home and traveling with him to a local motel, where he and four  
11 other predators forcibly raped her.

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

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

1     **II.     PARTIES**

2             **A.     Plaintiff**

3             8.       Minor Plaintiff, Jane Doe, and her mother and proposed guardian *ad litem*, Mary  
4 Doe, are citizens and residents of the State of Illinois, with a principal place of residence in Cook  
5 County.

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

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

20             **B.     Defendants**

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

25     **III.    JURISDICTION AND VENUE**

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

1           13. This Court has personal jurisdiction over Defendant because it maintains its  
2 principal place of business within this District.

3           14. Venue is proper here under 28 U.S.C. § 1391(b) because (1) Defendant is a resident  
4 of California and resides in this District and (2) a substantial part of the events or omissions giving  
5 rise to the claims occurred in this District.

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

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

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

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

15           17. Roblox is designed to be an interactive experience, allowing and encouraging users  
16 to communicate with each other. Gameplay interactions, user hubs, direct messaging, and voice chat  
17 all promote social interactions between users. Roblox’s co-founder and CEO David Baszucki has  
18 explained that his vision is for Roblox to bring about “the next phase of human interaction,” which  
19 he also has described as “a new category of human coexperience.”<sup>2</sup> Roblox has similarly explained  
20 that it “operates a human co-experience platform . . . where users interact with each other to explore  
21 and develop immersive, user-generated, 3D experiences.”<sup>3</sup>

22           18. Roblox designed its app for children. Roblox has marketed its app not only as the  
23 “#1 gaming site for kids and teens”<sup>4</sup> but also as an educational experience for young users. Roblox  
24

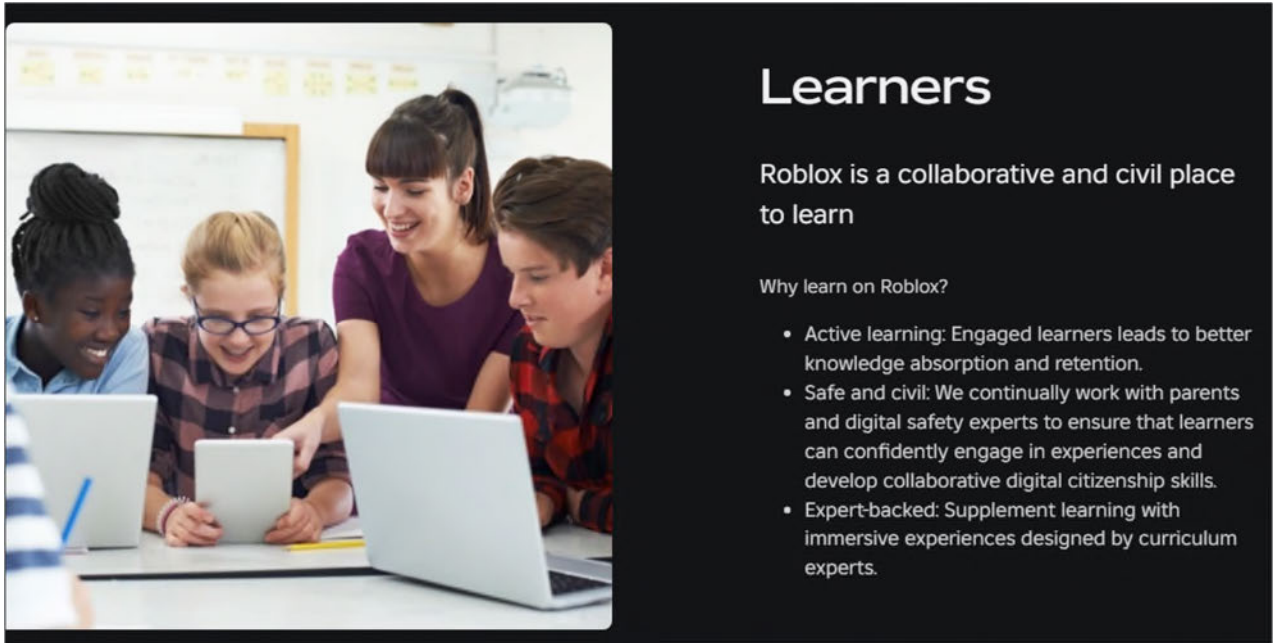
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25 <sup>2</sup> David Baszucki, Co-founder and CEO of Roblox, *The CEO of Roblox on Scaling Community-*  
26 *Sourced Innovation*, Har. Bus. Rev., The Magazine, (Mar-Apr 2022), [https://hbr.org/2022/03/the-](https://hbr.org/2022/03/the-ceo-of-roblox-on-scaling-community-sourced-innovation)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

28 <sup>3</sup> Roblox Corp., Quarterly Report (Form 10-Q) (Mar. 13, 2021).

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

claims that it provides “new gateways into learning”—from “chemistry to physics to robotics and more, Roblox experiences bring concepts to life in ways that immerse learners and motivate exploration, play, and deep thinking.”<sup>5</sup> These offerings, according to Roblox, include “high-quality, standards-aligned, immersive educational experiences designed by curriculum experts.”<sup>6</sup>



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

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

20. That growth has continued unabated. In Roblox’s 2023 Annual Report, the company reported an average of 68.5 million daily active users, with 21% under 9 years of age; 21% from 9-12 years of age; 16% from 13-16 years of age; and 41% over 17 years of age.

21. Today, Roblox is the most downloaded online game globally, and the average user

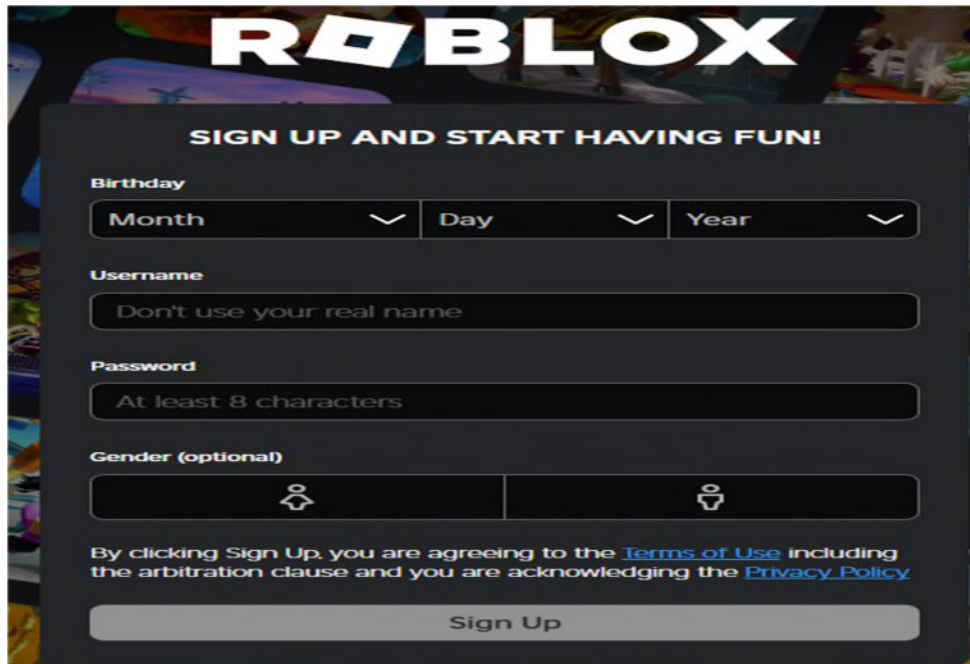
<sup>5</sup> Roblox, *A New Era of Engaged Learning*, <https://corp.roblox.com/education> (last visited Feb. 11, 2025).

<sup>6</sup> *Id.*



1 spends 139 minutes a day on the app.<sup>7</sup>

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

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18 *Roblox Sign-up Screen*

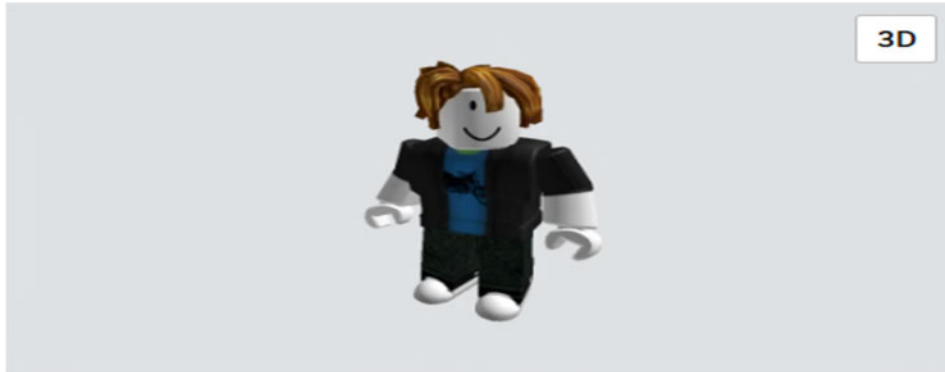
19 23. Although Roblox states that children must have parental permission before signing  
 20 up for an account, nothing prevents them from creating their own accounts and playing on Roblox.  
 21 Roblox does nothing to confirm or document that parental permission has been given, no matter  
 22 how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

24 24. Roblox has access to biometric age and identity verification software that requires  
 25 the user to take a photo of a government-issued ID along with a real-time “selfie” that is then verified  
 26

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

1 through artificial intelligence. While Roblox utilizes this software for certain purposes, it  
 2 intentionally or recklessly does not use this feature when new accounts are created. Instead, Roblox  
 3 continues to rely on self-reported birthdates for age verification, and its app is intentionally or  
 4 recklessly designed to allow users to create accounts using fake birthdates, allowing adults to pose  
 5 as children and children to easily circumvent the more restrictive controls for users under 13.

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



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14 *Example default avatar on Roblox.*

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



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28 *Examples of games available on Roblox.*

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

5           28.     Now, under Roblox’s default settings, adults cannot directly message children under  
6 13, but Roblox still does nothing to prevent children this young from creating accounts with fake  
7 13+ birthdates, which gives them full access to Roblox’s direct-messaging options. Roblox still  
8 relies on self-reported birthdates for age verification. Further, children 13 and over are still  
9 vulnerable to receiving friend requests—or direct messages within Roblox experiences—from adult  
10 strangers. There is also nothing that prohibits adults from entering fake birthdays and posing as  
11 children in their attempts to friend or otherwise communicate with children users.

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

17           30.     Children frequently become obsessed with purchasing or otherwise obtaining Robux  
18 to buy items for their avatars and to spend in their favorite experiences on Roblox. In Roblox’s  
19 Avatar Store, for example, the company sells rare items at astronomical prices, such as a type of  
20 hair for an avatar, which children seek to purchase to keep up with or outdo their peers on Roblox.  
21 As a result, children often tell others, including strangers, that they will do “Anything for Robux.”<sup>8</sup>

22           **B. Roblox Lures Parents into Letting Their Kids Use Roblox with Promises of**  
23           **Safety.**

24           31.     Roblox’s success and continued growth have hinged on its constant, false assurances  
25 to parents that its app is safe for children. The company has offered such assurances throughout its  
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27           <sup>8</sup> Olivia Carville & Cecilia D’Anastasio, *Roblox’s Pedophile Problem*, Bloomberg Businessweek  
28 (July 23, 2024), <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/>.

1 history and in every forum possible—on its website, through public promises of its highest  
2 executives, in news articles, on podcasts, and on and on.

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

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

13 34. The website has consistently sought to paint Roblox as “family friendly” and safe for  
14 children of all ages. In 2017, Roblox began declaring that it “take[s] kids’ safety and privacy very  
15 seriously” and “strive[s] to continually develop new and innovative technologies that will protect  
16 the safety of our community while allowing players to imagine, create, and play together in a family-  
17 friendly environment.”<sup>12</sup> Roblox similarly has advertised its app as “a safe, moderated place to meet,  
18 play, chat, and collaborate on creative projects.”<sup>13</sup>

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

23 <sup>10</sup> Roblox, *Keeping Kids Safe*,  
24 [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)  
25 [spx](https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx) (archived May 1, 2008); *see also* Roblox, *Information for Parents*,  
26 <https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents> (archived Jan. 31,  
2016).

26 <sup>11</sup> *Id.*

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

28 <sup>13</sup> *Id.*

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."<sup>14</sup> 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."<sup>15</sup> Roblox emphasized that it is "committed to ensuring that Roblox is a safe and fun place for everyone."<sup>16</sup> According to Roblox, it "goes above and beyond to foster an environment where people of any age can create, play, learn, and imagine safely. We've kept children's privacy and safety top-of-mind when designing our platform, especially through the implementation of advanced

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

<sup>15</sup> *Id.*

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



1 text filters that block inappropriate language or other unsafe content.”<sup>17</sup>

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

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

15 38. These false promises and assurances are not confined to Roblox’s website. They are  
16 repeated in statements by the company’s highest executives—including in direct response to  
17 concerns raised by parents.

18 39. In 2009, a blogger wrote about blocking Roblox because he doubted its safety for his  
19 children. CEO David Baszucki responded to the blogger reassuring him that Roblox flags  
20 “obviously offensive content” and removes it, and if “something is marginal, but gets flagged as  
21

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22 <sup>17</sup> 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)  
23 [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).

24 <sup>18</sup> 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)  
resources?section=news&article=safety-comes-first-on-roblox (last visited Feb. 11, 2025).

25 <sup>19</sup> 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)  
26 [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%200than%20younger%20players)  
Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200tha  
n%20younger%20players (last visited Feb. 11, 2025).

27 <sup>20</sup> 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).

<sup>21</sup> *Id.*

1 inappropriate,” Roblox “investigate[s] immediately.”<sup>22</sup>

2 40. In a 2013 *Wired* interview, when asked whether a parent should be concerned about  
3 whom his child was chatting with in-game, Baszucki declared, “We take every precaution possible  
4 to make sure kids are protected from inappropriate and offensive individuals as well as from  
5 indecent and distasteful content,” taking a sentence verbatim from Roblox’s webpage for parents.<sup>23</sup>

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

10 42. As recently as 2024, Bhaumik told *Parents Magazine* that “[w]e have a responsibility  
11 to make sure our players can learn, create, and play safely. This continues to be our most important  
12 priority and that will never change.”<sup>24</sup>

## 13 Parents

14  
15 In response to safety concerns, Roblox notes that the platform was  
16 designed for kids and teens from the beginning, and they’re committed to  
17 making safety a priority. “We have a responsibility to make sure our players  
18 can learn, create, and play safely,” notes Tami Bhaumik, Vice President of  
19 Civility & Partnerships at Roblox. “This continues to be our most important  
20 priority and that will never change.”

21  
22 43. Such statements by Bhaumik date back years. In 2018, Bhaumik told the *Washington*  
23  
24

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25 <sup>22</sup> Eric Frenchman, *Revisiting Roblox*, Pardon My French (Oct. 5, 2009),

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

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

28 <sup>24</sup> 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/>.

1 Post that Roblox “focus[es] on making sure that everything is done in a safe and appropriate way.”<sup>25</sup>  
 2 That year, she also claimed to another newspaper that Roblox’s “safety team reviews every uploaded  
 3 image, video, and audio file used within our games to make sure they are safe and age appropriate.”<sup>26</sup>  
 4 She also boasted that Roblox has “created extensive parental controls for our games and a detailed  
 5 Roblox Parent’s Guide that provides information to parents to help create a Roblox experience that’s  
 6 best for their child.”<sup>27</sup>

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

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

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

22 <sup>26</sup> 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),  
 23 <https://www.thesun.co.uk/news/5445444/roblox-app-children-danger-sex-warning/>.

24 <sup>27</sup> *Id.*

25 <sup>28</sup> YouTube, Digital Civility Panel (Oct. 23, 2019),  
[https://www.youtube.com/watch?v=XoUs1Js7WG0&list=PLcKphP00N1\\_kCLjvcOWdwbegJkNSL-CuL&index=6](https://www.youtube.com/watch?v=XoUs1Js7WG0&list=PLcKphP00N1_kCLjvcOWdwbegJkNSL-CuL&index=6).

26 <sup>29</sup> *Id.*

27 <sup>30</sup> *Id.*

28 <sup>31</sup> Video Interview with Tami Bhaumik, Roblox’s VP of Digital Civility & Partnerships (2022),  
<https://www.facebook.com/bedford.sheriff/videos/roblox-how-to-help-kids-use-itsafelyrobloxsvp-of-digital-civility-partnerships/1338989609901259/>.



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.”<sup>32</sup> 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.”<sup>33</sup>

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.”<sup>34</sup> 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.”<sup>35</sup> A few months later, he added, “Safety is and always has been  
 14 foundational to everything we do at Roblox.”<sup>36</sup>

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.”<sup>37</sup>

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.”<sup>38</sup>

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21 <sup>32</sup> YouTube, Into the Metaverse, Podcast: EP.21: Tami Bhaumik (Roblox) - Building a Safe &  
 Resilient Metaverse, [https://www.youtube.com/watch?v=LT5\\_bBOYS9A](https://www.youtube.com/watch?v=LT5_bBOYS9A).

22 <sup>33</sup> *Id.*

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

24 <sup>35</sup> *Id.*

25 <sup>36</sup> 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>.

26 <sup>37</sup> 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>.

27 <sup>38</sup> 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),  
 28 <https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features>.

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

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

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

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

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

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

21           54.     As early as 2010, Roblox's virtual games had already devolved into hosting and  
22 promoting sexually explicit content. Roblox's scripting language, which allows developers to  
23 manipulate avatar activity and interactions any way they want, was deployed to create scenarios  
24 where avatars engaged in simulated sexual activity.<sup>39</sup>

25  
26 \_\_\_\_\_  
27 <sup>39</sup> See, e.g., YouTube, *How to Do Roblox Sex Glitch*,  
28 [https://www.youtube.com/watch?v=Zz97Q1SQE\\_k](https://www.youtube.com/watch?v=Zz97Q1SQE_k); see also YouTube, *Roblox Sex?*,  
<https://www.youtube.com/watch?v=hyqCHG6nUYI>.

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

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

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23 <sup>40</sup> 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 <sup>41</sup> *Id.*

27 <sup>42</sup> 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/).

<sup>43</sup> Hindenburg, *supra* note 1.

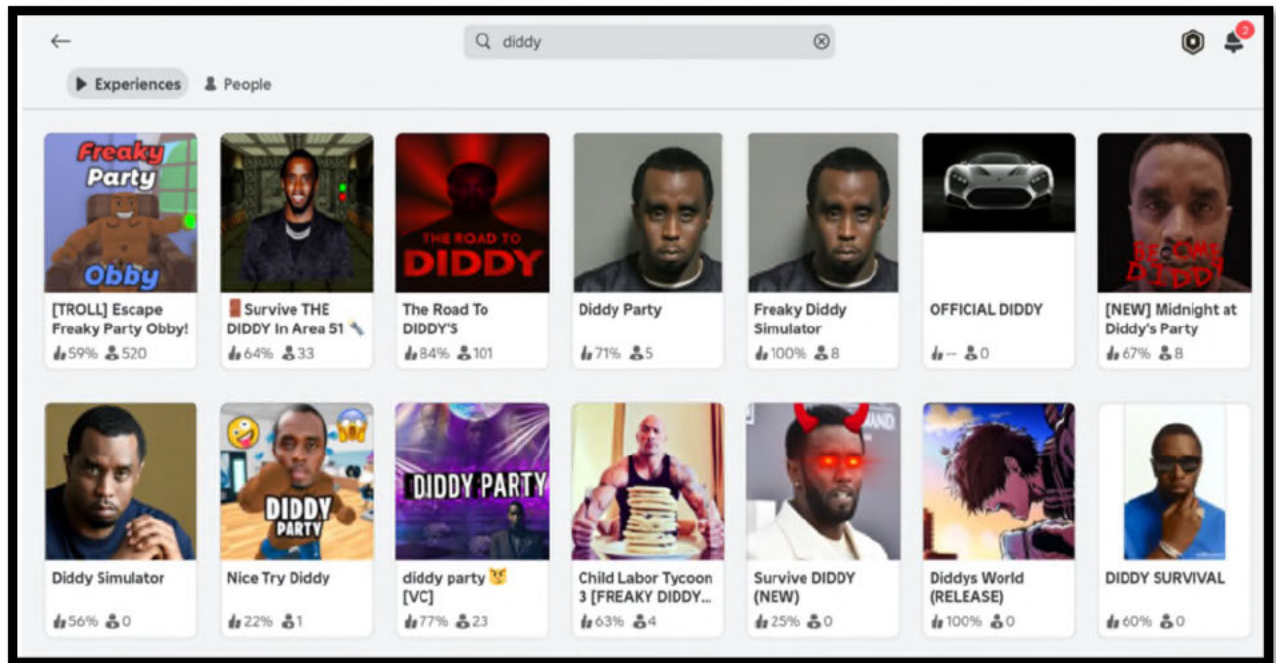
<sup>44</sup> Dickson, *supra* note 42.



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

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.

<sup>45</sup> Hindenburg Research, *supra* note 1.



*Examples of Roblox games modeled after Diddy's sex trafficking ventures.<sup>46</sup>*

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.



*Example of Roblox game modeled after Jeffrey Epstein's sex trafficking ventures.<sup>47</sup>*

<sup>46</sup> *Id.*

<sup>47</sup> *Id.*

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

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

15           61. Studies support this connection. One study found that playing games with  
16 sexualized content was linked to increased rates of sexual harassment toward female targets,  
17 suggesting that such exposure desensitizes players to the real-world consequences of these  
18 actions.<sup>49</sup> Another study showed that playing mature-rated games was associated with higher rates  
19 of risky sexual behavior years later, highlighting the long-term impact of exposure to sexualized or  
20 exploitative content.<sup>50</sup>

21           62. The interactive nature of games amplifies this effect. Unlike passive media, video  
22 games require players to actively participate in behaviors, including those that simulate  
23

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

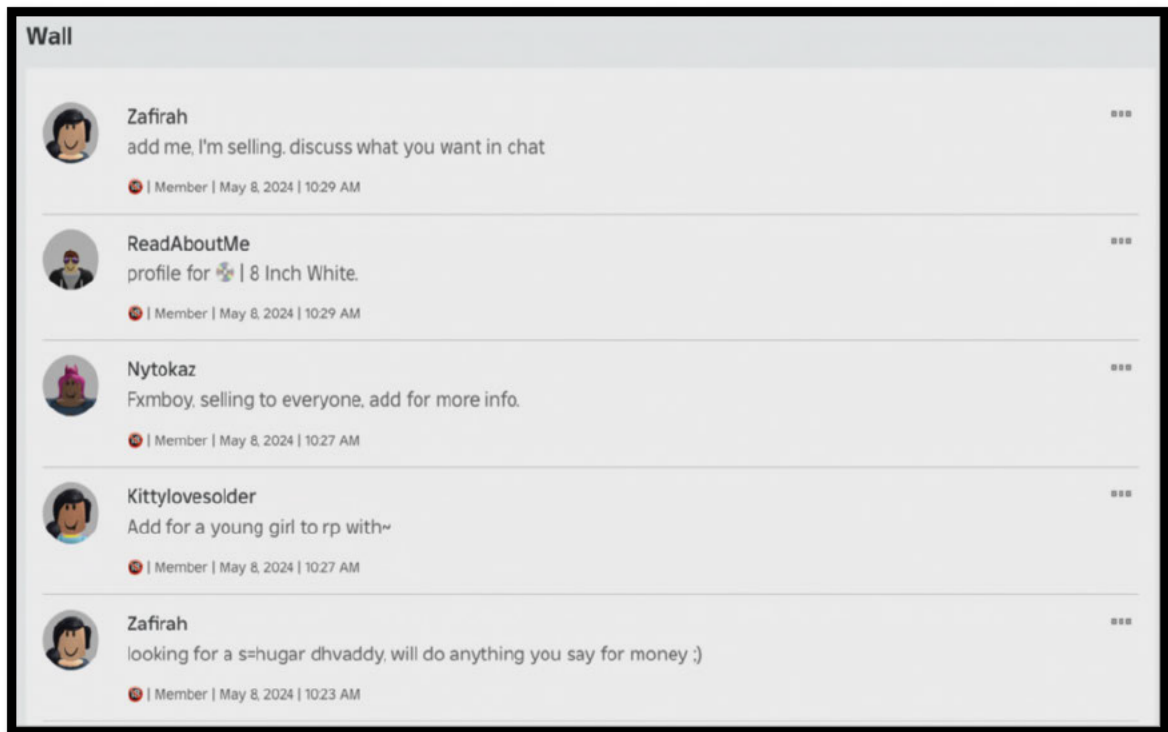
27 <sup>49</sup> Jonathan Burnay, Brad J. Bushman & Frank Larøi, *Effects of Sexualized Video Games on*  
*Online Sexual Harassment*, 45 *Aggressive Behavior* 2, 214 (March/April 2019).

28 <sup>50</sup> 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.



1 harassment or exploitation, reinforcing the perception that such actions are normal or desirable.  
 2 This environment not only desensitizes children but also makes them more likely to replicate these  
 3 actions in real-world interactions.

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



23 *Public chat wall for a group named “Adult Studios,” where users openly solicited*  
 24 *child pornography.*<sup>54</sup>

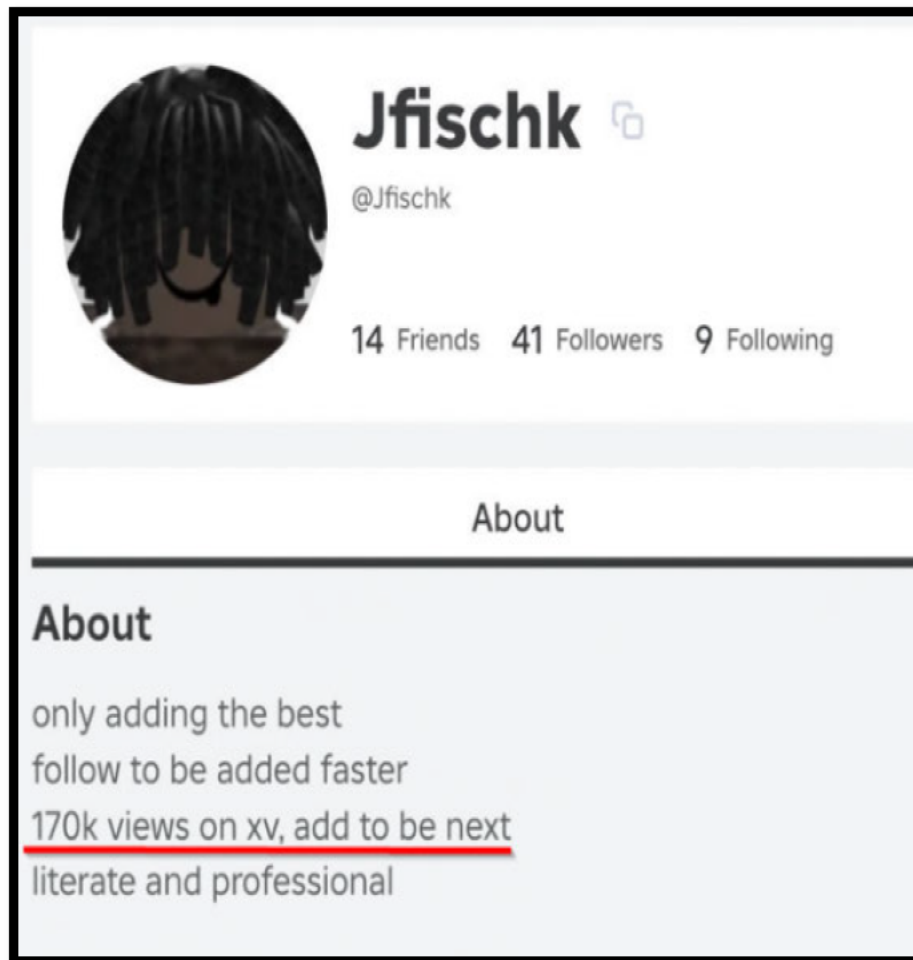
26 <sup>51</sup> Hindenburg Research, *supra* note 1.

27 <sup>52</sup> *Id.*

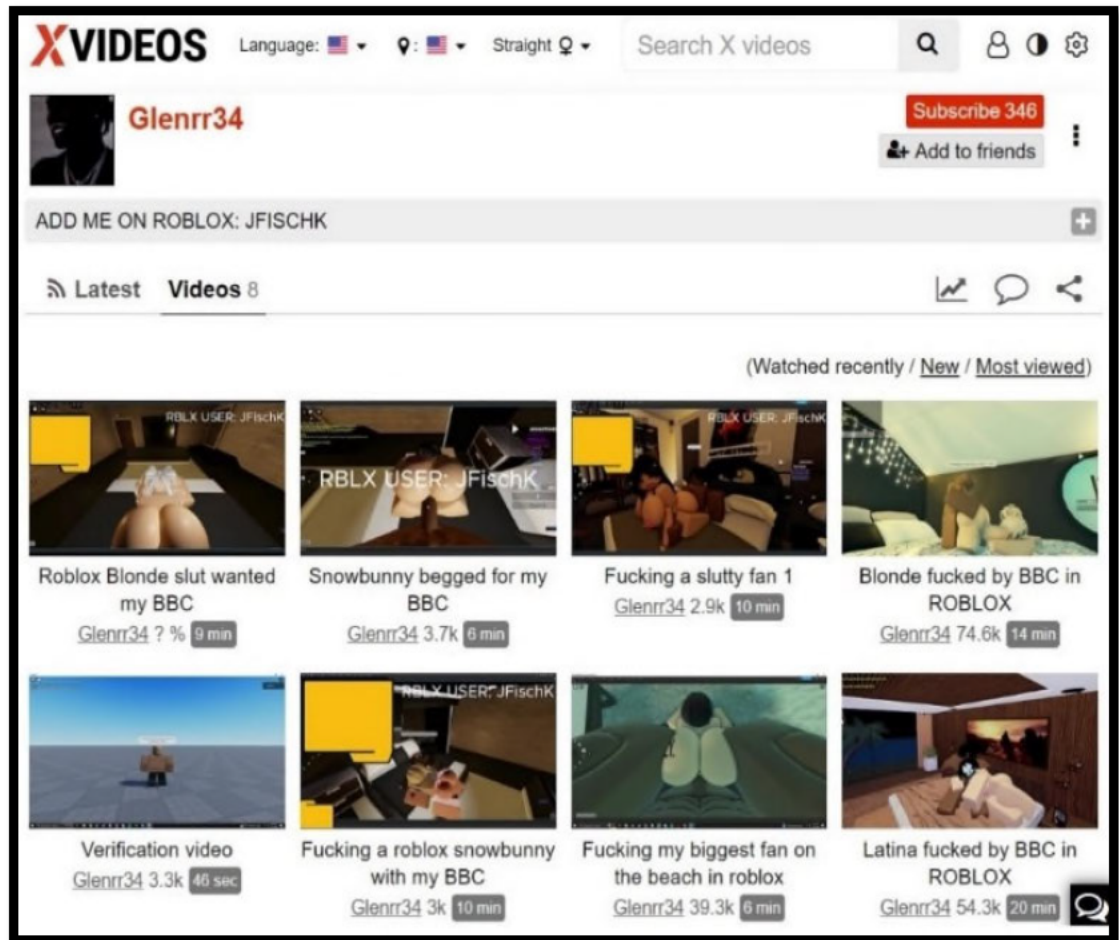
28 <sup>53</sup> *Id.*

<sup>54</sup> *Id.*

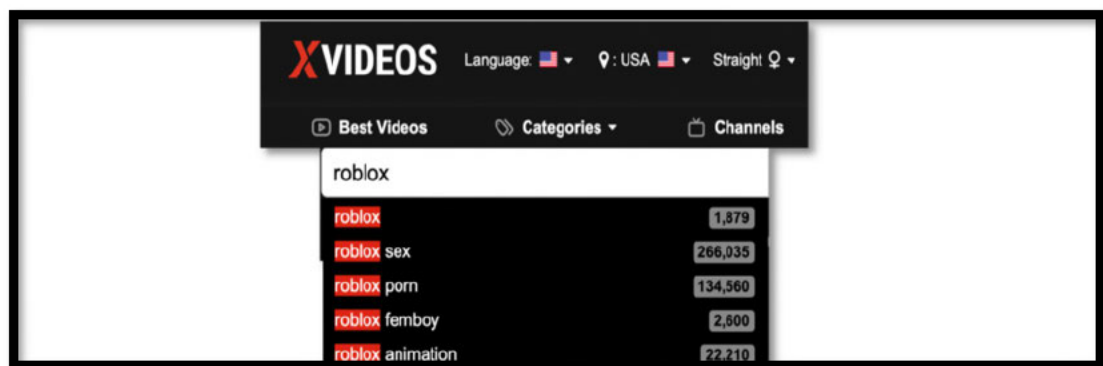
64. Roblox has also enabled individuals to create an entire category of pornographic content. Using Roblox's tools and software, users make virtual sex videos between avatars on Roblox. These videos are clearly marked with the .rbxl file extension—Roblox's proprietary file format—establishing that this 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.







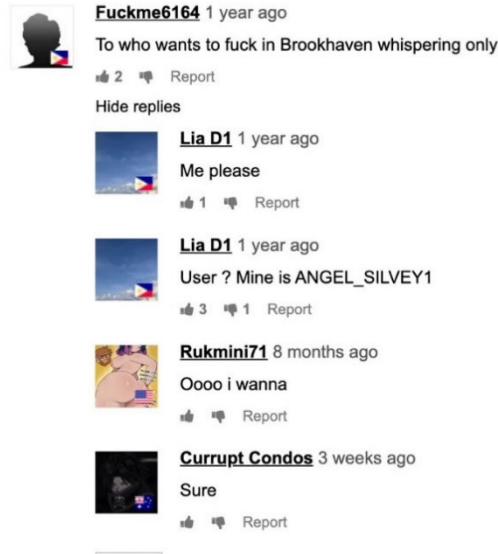
*This Roblox user advertised their Roblox account on porn website, XVideos, where they had uploaded videos of their avatar having sex with other Roblox users.<sup>55</sup>*



*Searching "Roblox" on XVideos, a porn website, yields more than 250,000 results.<sup>56</sup>*

<sup>55</sup> *Id.*

<sup>56</sup> *Id.*



*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.<sup>57</sup>*

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.

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

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

67. These systematic patterns of exploitation on Roblox follow a predictable and preventable sequence that the company has known about and facilitated for years: a predator misrepresents their age to other users on the app, cosplaying as a fellow child, methodically

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<sup>57</sup> *Id.*

1 befriends the vulnerable young victim, and then strategically manipulates the child to move the  
2 conversation off Roblox to other popular apps, such as Discord or Snapchat.

3 68. As the recent *Bloomberg Businessweek* article titled *Roblox's Pedophile Problem*  
4 put it, "These predators weren't just lurking outside the world's largest virtual playground. They  
5 were hanging from the jungle gym, using Roblox to lure kids into sending photographs or  
6 developing relationships with them that moved to other online platforms and, eventually, offline."<sup>58</sup>

7 69. Roblox, in effect, serves as an initial access point to children for predators. Media  
8 reports have repeatedly highlighted that Roblox "is being used as a first point of contact for  
9 predators."<sup>59</sup> The children, due to their underdeveloped brains, are more trusting and naïve, and  
10 often fail to recognize the danger of providing their usernames on other sites.

11 70. Once on another app, like Discord or Snapchat, predators escalate their exploitation  
12 by soliciting explicit material, like nude photos or videos of children doing sexually inappropriate  
13 acts, all of which constitute child pornography. And while the ultimate solicitation of explicit  
14 photos or other criminal acts may occur on other apps, Roblox serves as the critical facilitator that  
15 enables these predators to first identify, target, and gain the trust of young victims through its app's  
16 design and inadequate safety measures.

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

23 72. Despite full awareness of how its app facilitates such exploitation, Roblox continues  
24 to profit from these tactics by collecting transaction fees on Robux exchanges. Its reckless  
25

26  
27 <sup>58</sup> Carville & D'Anastasio, *supra* note 8.

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

1 indifference to the consequences of its deliberately engineered app mechanics highlights its  
2 prioritization of profits over the safety and well-being of its young users.

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

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

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

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

23 77. In 2018, Roblox's app enabled a predator posing as a child to coerce a nine-year-old  
24 girl into performing and filming sexually abusive acts on her four-year-old brother through violent  
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26 <sup>60</sup> Pei-Sze Cheng, Evan Stulberger & Dave Manney, *I-Team: Popular Online Gaming Site for*  
27 *Kids is Breeding Ground for Child Sex Predators, Mother Says*, NBC New York (Apr. 6, 2017),  
28 <https://www.nbcnewyork.com/news/local/video-game-warning-roblox-child-sex-predator-online-site-investigation-what-to-know/87438/>.

1 threats, including of death, against her family.<sup>61</sup> That year, 24 men in New Jersey were also charged  
 2 with soliciting sex from minors as part of a sting operation, where the New Jersey State Police  
 3 Lieutenant specifically called out Roblox as a place where “individuals are posing as someone else”  
 4 in order “to gain someone’s trust.”<sup>62</sup>

5 78. In 2019, a Florida predator systematically used Roblox to target children ages 10-  
 6 12, moving them to Discord to coerce the children into sending him naked pictures of themselves.<sup>63</sup>  
 7 That year, a man in Wales encouraged 150 children to engage in sexual activity by contacting them  
 8 through Roblox, where he pretended to be a child and used fake names.<sup>64</sup>

9 79. During the pandemic, reports of child sex abuse facilitated by Roblox accelerated.  
 10 In 2020, for example, Roblox enabled a 47-year-old predator to pose as a teenager, target a 16-year-  
 11 old girl, move the conversation to Facebook, solicit explicit photos and videos, all of which  
 12 constituted child pornography,<sup>65</sup> and ultimately traffic her across state lines, raping her multiple  
 13 times.<sup>66</sup> In Michigan, a man was arrested for persuading an eight-year-old girl to send him videos  
 14 of herself, in various stages of undress, in exchange for Robux.<sup>67</sup> The perpetrator had been arrested  
 15 for similar offenses three years earlier and was a registered sex offender in Kansas. This perpetrator  
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 18 <sup>61</sup> Briana Barker, *Internet Safety and Your Children: How Kids are at Risk*, Record-Courier (Mar.  
 19 27, 2018), <https://www.record-courier.com/story/news/2018/03/27/internet-safety-your-children-how/12899346007/>.

20 <sup>62</sup> *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>.

21 <sup>63</sup> Max Chesnes, *Deputies Say Vero Beach Man Used Popular Video Game Platforms to Target*  
 22 *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/>.

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

25 <sup>65</sup> U.S. Dep’t of Justice, *Magnolia Man Gets Life For Exploiting Young Female He Met and*  
 26 *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>.

27 <sup>66</sup> *United States v. McGavitt*, 28 F.4th 571, 578 (5th Cir. 2022).

28 <sup>67</sup> *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>.

1 was not the only convicted sex offender who was able to freely create accounts on Roblox: in 2021,  
 2 a convicted sex offender used Roblox to sexually solicit a 12-year-old child.<sup>68</sup> And in 2022, a 33-  
 3 year-old man groomed a 13-year-old girl on Roblox, transported her from her home in Kansas to  
 4 his home in Georgia, and raped her multiple times.<sup>69</sup>

5 80. 2023 was more of the same. For example, a 30-year-old man was arrested for  
 6 soliciting illicit photos from young victims and authorities reported that he had three separate  
 7 Roblox accounts.<sup>70</sup> A 27-year-old man was arrested for kidnapping an 11-year-old girl whom he  
 8 met on Roblox.<sup>71</sup> A 23-year-old New Jersey man, who was a prominent Roblox developer with a  
 9 known history of exploiting children via Roblox, was sentenced to 15 years in prison for grooming  
 10 a 15-year-old girl, transporting her to his house, and sexually abusing her.<sup>72</sup>

11 81. Similar incidents continued throughout 2024. For example, a 21-year-old Chilean  
 12 man was arrested for traveling to the U.S. to meet an underage girl he met on Roblox, where he  
 13 had “spent several months manipulating and grooming” her.<sup>73</sup> A 21-year-old in California pled  
 14 guilty for directing a 10-year-old girl, whom he met on Roblox, to disrobe and touch herself.<sup>74</sup> A  
 15

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16 <sup>68</sup> Jeff Bonty, *Man Charged With Soliciting Juvenile Through Roblox*, Daily Journal (Jul. 23,  
 17 2021), <https://www.shawlocal.com/daily-journal/>.

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

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

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

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

<sup>73</sup> 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),  
<https://www.latimes.com/california/story/2024-08-22/chilean-arrest-roblox-child-exploitation>.

<sup>74</sup> 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-](https://krcrtv.com/news/local/online-predator-who-targeted-10-year-old-on-roblox-pleads-guilty-in-butte-county)  
[year-old-on-roblox-pleads-guilty-in-butte-county](https://krcrtv.com/news/local/online-predator-who-targeted-10-year-old-on-roblox-pleads-guilty-in-butte-county).



1 64-year-old man admitted to posing as a 13-year-old boy on Roblox, where he met a 12-year-old  
 2 girl and convinced her to send sexually explicit photos of herself and a young relative.<sup>75</sup> A 29-year-  
 3 old Michigan befriended and groomed an 11-year-old girl on Roblox by posing as a teenager and  
 4 then coerced the girl into sending multiple explicit photos of herself.<sup>76</sup> And a 24-year-old man raped  
 5 a 10-year-old girl he had met on Roblox.<sup>77</sup>

6 82. Despite supposed “parental controls” that Roblox implemented in 2024 and 2025,  
 7 predators continue to enjoy easy access to children on the app, causing devastating harm. For  
 8 example, in April 2025, a California man was arrested and charged with kidnapping and engaging  
 9 in unlawful sexual conduct with 10-year-old girl whom he met and communicated with on  
 10 Roblox.<sup>78</sup> The next month, a 17-year-old Florida teenager was arrested after authorities learned he  
 11 had been communicating on Roblox with numerous children, some as young as eight-years-old,  
 12 over the course of a year and convinced them to send him sexually explicit images of themselves.<sup>79</sup>  
 13 And just a few days later, a New York man who used Roblox to connect with 11- and 13-year-old  
 14 girls was arrested and federally charged with enticement and possession of child pornography.<sup>80</sup>

15  
 16  
 17  
 18 <sup>75</sup> 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-](https://ktla.com/news/california/man-64-admits-to-catfishing-girl-on-roblox-convincing-her-to-send-explicit-images/)  
 19 [catfishing-girl-on-roblox-convincing-her-to-send-explicit-images/](https://ktla.com/news/california/man-64-admits-to-catfishing-girl-on-roblox-convincing-her-to-send-explicit-images/).

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

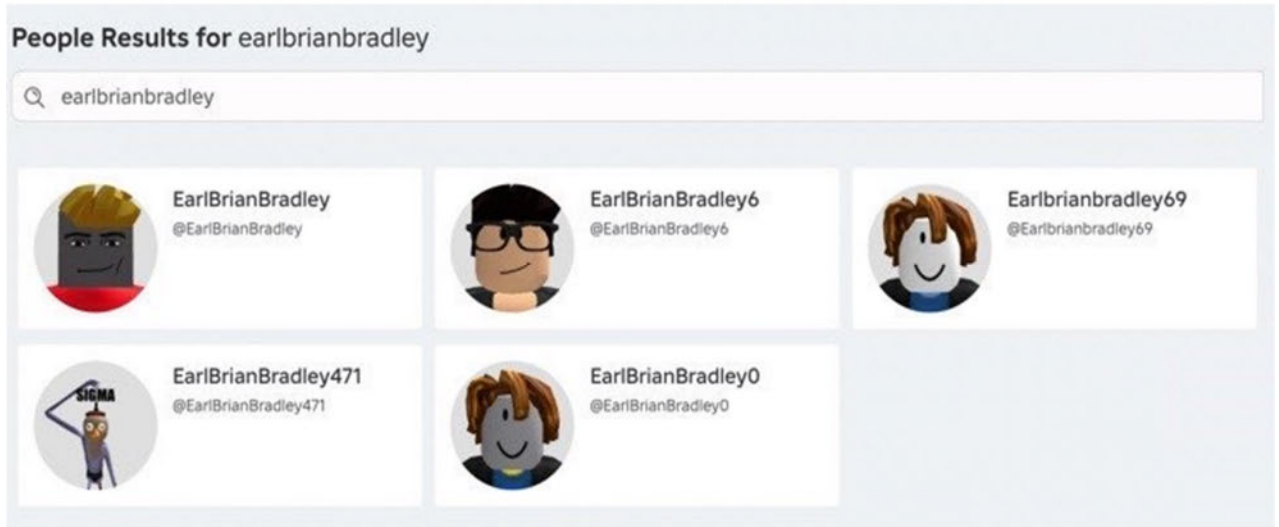
22 <sup>77</sup> Martin Robinson, *Roblox Predator Who Raped 10-year-old Girl is Locked Up: Paedophile Who*  
*‘Targeted Child He Met on Gaming Platform Is Jailed for Six Years*, Daily Mail (Jan. 17, 2025),  
 23 <https://www.dailymail.co.uk/news/article-14278563/Roblox-predator-raped-10-year-old-girl.html>.

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

26 <sup>79</sup> Briana Trujillo, *Ocala 17-Year-Old Convinced Kids to Send Him Sex Abuse Material on*  
*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 <sup>80</sup> U.S. Dep’t of Justice, *Fairport Man Who Used Roblox to Attempt to Communicate with Minors*  
*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)  
 28 [roblox-attempt-communicate-minors-sex-arrested](https://www.justice.gov/usao-wdny/pr/fairport-man-who-used-roblox-attempt-communicate-minors-sex-arrested).

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



*Results from an account search for “earlbrianbradley.”*<sup>81</sup>

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.”<sup>82</sup> According to the NCSE, “[u]ntil basic child protection standards are met, Roblox remains too high risk for kids.”<sup>83</sup>

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.<sup>84</sup>

<sup>81</sup> Hindenburg Research, *supra* note 1.

<sup>82</sup> National Center on Sexual Exploitation, *supra* note 59.

<sup>83</sup> *Id.*

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



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.<sup>85</sup> 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, schools and the public, 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 enriching part of their life.”<sup>86</sup> And while Kaufman publicly claims that “any time anything happens to a child that puts them at risk is one too many,”<sup>87</sup> Roblox simultaneously admitted to investors that it was “unable to prevent all such [inappropriate] interactions from taking place.”<sup>88</sup> This calculated contradiction between public messaging and private admissions—telling parents that even one incident is unacceptable while simultaneously acknowledging to investors that abuse is inevitable—exposes Roblox’s strategy of prioritizing public relations through hollow and misleading public statements over its fundamental duty to protect children.

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<sup>85</sup> 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).

<sup>86</sup> 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>.

<sup>87</sup> *Id.*

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

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

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

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

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

12           91.     Roblox's business model allowed the company to attract significant venture capital  
13 funding from big-name investors like Kleiner Perkins and Andreessen Horowitz, putting enormous  
14 pressure on the company to prioritize growing and monetizing its users. To do so, Roblox made  
15 deliberate decisions that placed children at risk. For example, while other digital platforms  
16 (including other video game platforms) verified users' ages and restricted communications between  
17 children and adults, Roblox did not require age verification and did not restrict communications  
18 between children and adults. Similarly, while other digital platforms required children's accounts  
19 to be connected to the account of a parent or guardian during set-up, with various parental controls  
20 turned on by default, it is easy for children (including very young children) to download and install  
21 Roblox without involving an adult. While other platforms implemented reliable, accurate age  
22 ratings for games and videos that correctly informed parents about the type of content their children  
23 would see, Roblox's deeply flawed "content label" system gave parents a false sense of security,  
24 incorrectly labeling graphic sexual and violent games as safe for kids. And while other platforms  
25 restricted access if a child fell below a certain age, Roblox welcomed and encouraged children of  
26 any age, despite their knowledge of significant harms that children routinely experience there.

27           92.     In 2021, riding the explosive growth in users generated by the pandemic and the  
28 pandemic-driven enthusiasm for technology stocks, Roblox went public at a valuation of \$41

1 billion, which brought new pressures. To satisfy the scrutiny and demands of public market  
 2 investors, Roblox, like many unprofitable companies, prioritized rapid growth in revenue and user  
 3 engagement metrics—like new user acquisition, daily active users, and average hours spent on the  
 4 app—on the theory that profitability would follow once the business achieved sufficient scale and  
 5 operating costs decreased as a percentage of revenue.<sup>89</sup>

6 93. In pursuit of growth, Roblox deprioritized safety measures even further so that it  
 7 could report strong numbers to Wall Street. For instance, Roblox executives rejected employee  
 8 proposals for parental approval requirements that would protect children on the platform.<sup>90</sup>  
 9 Employees also reported feeling explicit pressure to avoid any changes that could reduce platform  
 10 engagement, even when those changes would protect children from predators.<sup>91</sup>

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

17 95. By limiting safety measures, Roblox not only increased its users but also reduced  
 18 the company’s safety expenses as a percentage of its revenue—a key metric for Wall Street, which  
 19 views trust and safety costs as detrimental to Roblox’s stock performance. Barclays, for example,  
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21  
 22 <sup>89</sup> After listing on the New York Stock Exchange, Roblox CEO David Baszucki told CNBC,  
 23 “Roblox has been growing for 15 years . . . . That’s a long-term growth path, and we believe that  
 24 continues forward, even after Covid.” Ari Levy & Jessica Bursztynsky, *Roblox Jumps to \$38*  
 25 *Billion Mark Cap as Public Investors Get Their First Crack at the Popular Kids Game App*,  
 26 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.*

<sup>90</sup> Hindenburg Research, *supra* note 1.

<sup>91</sup> *Id.*

<sup>92</sup> *Id.*

<sup>93</sup> *Id.*

1 identified its “downside case” for Roblox’s stock as “additional safety investments due to its  
2 younger demographic . . . becom[ing] a drag on [earnings] margins.”<sup>94</sup> Barclays also wrote that it  
3 viewed increased safety costs as a “negative” in Roblox’s quarterly earnings.<sup>95</sup>

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

9 97. For example, on Roblox’s 2023 fourth quarter earnings call, an analyst praised the  
10 “really high level of efficiency” seen in the numbers for infrastructure and trust and safety  
11 expenditures and then asked how those figures would evolve over time.<sup>96</sup> In response, Mike  
12 Guthrie, Roblox’s CFO, emphasized the company’s goal of reducing expenses, stating, “cost to  
13 serve is the metric that we use and it’s the metric that the [infrastructure] team owns . . . *they’re*  
14 *working hard to drive that down* . . . . [L]ike you said, it’s about 11% now, ultimately with higher  
15 efficiency . . . we see that as a high-single-digit number over the next few years.”<sup>97</sup> He added, “[W]e  
16 still think there’s more to do there.”<sup>98</sup>

17 98. At other times, Guthrie has reassured investors stating, “look for trust and safety  
18 [costs] to scale below linear as we grow”<sup>99</sup> and that Roblox was “quite happy with” trust and safety  
19 costs growing “at a lower rate than our bookings growth.”<sup>100</sup>

20 99. Similarly, in the second quarter of 2024, CEO Baszucki highlighted that,  
21 “[i]mportantly, our infrastructure and trust and safety expenditures were 8% lower year-on-year.”<sup>101</sup>

22 \_\_\_\_\_  
23 <sup>94</sup> Ross Sandler, Trevor Young & Alex Hughes, *Back on Track Following the 1H Hiccup*,  
Barclays (Aug. 1, 2024)

24 <sup>95</sup> Ross Sandler, Trevor Young & Alex Hughes, *Everything Accelerating, Safety & Security a Top*  
25 *Priority*, Barclays (Nov. 1, 2024)

26 <sup>96</sup> Q4 2023 Earnings Call (Feb. 7, 2024).

27 <sup>97</sup> *Id.* (emphasis added).

28 <sup>98</sup> *Id.*

<sup>99</sup> Q4 2022 Earnings Call (Feb. 15, 2023)

<sup>100</sup> Q3 2022 Earnings Cal (Nov. 8, 2023).

<sup>101</sup> Q2 2024 Earnings Call (Aug. 1, 2024).

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

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

11           102. Roblox’s executives repeatedly emphasized their strategy of “aging up” the app to  
 12 attract older users. At the company’s inaugural conference with an investment bank in September  
 13 2021, Roblox’s CFO, Michael Guthrie, noted that Roblox had achieved “very good penetration of  
 14 nine to twelve year-olds,” and was focused on adding users over the age of 13.<sup>105</sup> One plan was to  
 15 “improve the search algorithms such that older users were finding older content,” or content  
 16 tailored to their age-related demographic.<sup>106</sup>

17           103. And at its annual Developer Conference, CEO David Baszucki encouraged  
 18 developers to create experiences for older audiences, explaining that Roblox was rolling out  
 19 features designed to appeal to older users, including use of real names, screen capture and sharing  
 20 capabilities, video calls, and relaxed chat moderation.<sup>107</sup> These decisions, while framed as growth  
 21

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22  
 23 <sup>102</sup> Roblox, *What Is Roblox*,  
<http://web.archive.org/web/20170227121323/https://www.roblox.com/> (archived Feb. 27, 2017).

24 <sup>103</sup> Roblox Corp., S-1 (Securities Registration Statement) 7 (Nov. 19, 2020).

25 <sup>104</sup> Q2 2022 Earnings Call (Aug. 10, 2022).

26 <sup>105</sup> 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>.

27 <sup>106</sup> *Id.*

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

1 strategies, reflected Roblox’s willingness to compromise safety, creating new vulnerabilities and  
2 more dangerous circumstances for children in its pursuit of a more profitable, older user base.

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

10 105. Despite Roblox’s deliberate targeting of older users, it failed to implement any  
11 meaningful restrictions on contact between adult and child users or limit the mature content and  
12 experiences it solicited from developers to attract older audiences. When asked by an equity  
13 research analyst about aged-13-and-up experiences for older users, CEO Baszucki admitted, “I  
14 want to highlight right now that *we don’t have any only 13 and up experiences*. We have 28% of  
15 the top thousand experiences having a majority of 13-plus [users] but *those are still experiences*  
16 *that are open to all ages*.”<sup>111</sup> Similarly, despite urging developers to build more mature experiences,  
17 Roblox continued to allow users to set up accounts without any type of age verification.<sup>112</sup> Even  
18 investors recognized the connection between older users and the increased risks for children,  
19 questioning how Roblox planned to prevent inappropriate content from reaching younger users.<sup>113</sup>

20 106. Not only did Roblox seek to increase adult users while knowing the risks that  
21 strategy posed to children, but it also sought to encourage relationships between users. At Roblox’s  
22 2023 Developers Conference, CEO Baszucki revealed Roblox’s strategy to facilitate “real-life  
23 relationships” between users—*i.e.*, dating. While he deliberately avoided the word “dating,” he  
24

25 <sup>108</sup> Q2 2023 Earnings Call (Aug. 9, 2023).

26 <sup>109</sup> Q2 2023 Earnings Call (Aug. 9, 2023).

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

27 <sup>111</sup> Q3 2021 Earnings Call (Nov. 9, 2021) (emphasis added).

<sup>112</sup> Q4 2022 Earnings Call (Feb. 15, 2023).

28 <sup>113</sup> Q3 2021 Earnings Call, *supra* note 111.

1 then announced plans to build a product to support it: “I’m not going to use the D word but  
2 subsequent[] real-life relationships is going to happen, okay? And we’re going to build a platform  
3 to support that.”<sup>114</sup>

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

8 108. In short, for years, Roblox has deliberately sacrificed child protection—a  
9 longstanding issue for the company—in pursuit of growth and profit. This systematic subordination  
10 of child safety to business objectives reflects Roblox’s continued choice to maximize its business  
11 goals while knowingly exposing children to preventable dangers on its app.

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

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

17 110. Roblox designed its app so that anyone can easily communicate with children,  
18 creating a virtual world where predators can freely target and groom children. Until November  
19 2024, adult strangers could “friend” and chat with children of any age via direct messages and chat  
20 with them in an experience through direct messages even if they were not friends. While Roblox  
21 offered some adjustable parental controls for users under the age of 13, these children could bypass  
22 those controls simply by creating an alternate account falsely identifying as a 13+-year-old user.  
23 By designing its app this way, Roblox stripped parents of basic protective options to prevent adult  
24 strangers from communicating with their children.

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

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



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

6           112. Roblox further endangered children by introducing voice calls in November 2023.  
7 Called “Roblox Connect,” this virtual call feature allows users to have a conversation through their  
8 avatars in real time. Concerns were immediately raised about this feature. For example, one user  
9 emphasized, “This is a bad idea Roblox, and especially on your platform because this is where  
10 most predators are coming from, and it makes it way easier for predators to prey on children.”<sup>117</sup>

11           113. As Roblox contemplated and rolled out Roblox Connect, it knew that this feature  
12 would drastically increase the risk to children on its app. That is because another company had  
13 implemented a similar feature with disastrous consequences. Omegle was a chat website that  
14 operated from 2009 to 2023. Omegle allowed users, including children, to engage in anonymous  
15 chats with strangers. In March 2010, Omegle introduced a video-chat feature. Despite efforts to  
16 monitor for mature and sexual content, the website became infamous for exposing minors to  
17 explicit material, predators, and exploitation. Omegle’s failure to protect users led to numerous  
18 incidents, including criminal cases involving child pornography. In November 2023, the same  
19 month Roblox launched Roblox Connect, Omegle announced that it would cease operations. In  
20 shutting down, its founder highlighted the site’s misuse: “[T]here can be no honest accounting of  
21 Omegle without acknowledging that some people misused it, including to commit unspeakably  
22 heinous crimes.”<sup>118</sup> And he thanked one survivor for “opening my eyes to the human cost of  
23 Omegle.”<sup>119</sup> Nevertheless, Roblox introduced voice calls the same month that Omegle shut down.

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25 <sup>116</sup> Carville & D’Anastasio, *supra* note 8.

26 <sup>117</sup> Josh Taylor, *Roblox Under Fire After Adding Controversial Voice Call Feature*, Dexerto (Nov.  
27 15, 2023), <https://www.dexerto.com/roblox/roblox-under-fire-after-adding-controversial-voice-call-feature-2384564/>.

28 <sup>118</sup> Omegle, <https://www.omegle.com/> (last visited Feb. 11, 2025).

<sup>119</sup> *Id.*



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

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

8 116. Roblox also could have required children to provide their names and email  
9 addresses and obtain parental approval—a fundamental protection against predators—but refused  
10 to do so. This decision allowed the company to bypass certain protections that are mandated by  
11 federal law and designed to protect children. The Children’s Online Privacy Protection Act  
12 (“COPPA”) prohibits companies like Roblox from collecting, using, or disclosing the personal  
13 information of children under 13 without verifiable parental consent. COPPA was enacted because  
14 Congress recognized the heightened vulnerability of children on the internet. As the Federal Trade  
15 Commission (“FTC”) noted, children under 13 lack the capacity to “understand fully the potential  
16 serious safety and privacy implications” of sharing their personal information.<sup>120</sup> More recent  
17 international regulations are stricter. For example, the European Union’s General Data Protection  
18 Regulation (GDPR) requires verifiable parental consent for children under 16.<sup>121</sup>

19 117. The FTC has outlined clear and acceptable methods for obtaining verifiable parental  
20 consent. These include: (a) providing a form for parents to sign and return; (b) requiring the use of  
21 a credit card or online payment that notifies parents of each transaction; (c) connecting parents to  
22 trained personnel via video conference; (d) offering a staffed toll-free number for parental  
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24 <sup>120</sup> Federal Trade Commission, *Privacy Online: A Report to Congress* (1998),  
25 <https://www.ftc.gov/sites/default/files/documents/reports/privacy-online-report-congress/priv-23a.pdf>.

26 <sup>121</sup> Art. 8 GDPR; *see also* Consent to Use Data on Children, EU Agency for Fundamental Rights  
27 (<https://fra.europa.eu/en/publication/2017/mapping-minimum-age-requirements-concerning-rights-child-eu/consent-use-data-children>). Note that member states can lower the cutoff to 13, 14  
28 or 15 if they choose.

1 verification; (e) asking knowledge-based questions to confirm identity; or (f) verifying a parent's  
2 photo-ID by comparing it to a second photo using facial recognition technology.<sup>122</sup>

3 118. Yet instead of implementing safeguards to comply with COPPA, Roblox chose to  
4 bypass these protections altogether. Roblox intentionally avoids requesting a name or email address  
5 during sign-up to sidestep the requirement of verifiable parental consent. In fact, former employees  
6 revealed that Roblox considered requiring verifiable consent, but ultimately resisted its  
7 implementation out of fear that such requirements might drive users away.<sup>123</sup> Consequently,  
8 creating a Roblox account is alarmingly easy, requiring less than sixty seconds and no meaningful  
9 oversight—a choice that prioritizes growth over the safety of its youngest users.<sup>124</sup>

10 119. Another easy-to-implement feature that would have improved safety is adding pop-  
11 up safety notices within chats and games to warn users about their behavior or the dangerous  
12 behavior of others. But Roblox executives also rejected this change.<sup>125</sup>

13 120. Additionally, although Roblox knew that predators routinely operate dozens of  
14 Roblox accounts at the same time, the company chose not to implement basic blocking of digital  
15 identifiers—both the unique network addresses that track internet connections (Internet Protocol  
16 or IP addresses) and the permanent hardware identification numbers assigned to devices (Media  
17 Access Control or MAC addresses) that could prevent predators from creating multiple accounts.<sup>126</sup>

18 121. Similarly, Roblox chose not to require adult users to verify phone numbers—which  
19 would create significant barriers to predators creating multiple accounts—despite knowing that this  
20 enables bad actors to easily create numerous anonymous accounts to target children.<sup>127</sup>

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23 <sup>122</sup> Federal Trade Commission, *Complying with COPPA: Frequently Asked Questions*, July 2020,  
24 <https://www.ftc.gov/business-guidance/resources/complying-coppa-frequently-asked-questions>.

25 <sup>123</sup> Hindenburg Research, *supra* note 1.

26 <sup>124</sup> 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>.

27 <sup>125</sup> Carville & D'Anastasio, *supra* note 8.

28 <sup>126</sup> *Id.*

1 122. Roblox also opted not to require users to verify their age by uploading a picture of  
2 either their or their parents' ID, a practice that many other applications employ. Doing so would  
3 have restricted the content available to young users and prevented predators from easily  
4 misrepresenting their age, which is often their approach in targeting and grooming children. As one  
5 father told the press after seeing other users solicit his avatar for sex, "There is nothing to stop  
6 adults going on there and pretending they're kids."<sup>128</sup>

7 123. Roblox could easily have restricted communications between adult accounts and  
8 children's accounts, something that many other platforms have done. It could also have restricted  
9 adult accounts from sending Robux to children's accounts, a feature that sexual predators  
10 frequently use to lure children.

11 124. Roblox likewise could have created a separate, gated platform for younger children  
12 that excludes adults. If supported by age verification using facial recognition (a service that is  
13 widely commercially available), the company could create a space for young children to enjoy  
14 Roblox games with very few, if any, adults present. Many digital service companies have adopted  
15 separate platforms for children of young ages, including, for example, Amazon and Netflix.

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

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26 <sup>128</sup> 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),  
28 <https://www.thesun.co.uk/news/2872376/horried-dad-found-sick-messages-from-paedo-predator-in-his-eight-year-old-sons-roblox-ipad-game/>.

1           126. Despite these glaring failures, Roblox aggressively markets and promotes itself as  
 2 an “industry leader” when it comes to child safety.<sup>129</sup> Central to this self-serving narrative is its  
 3 “accomplishments” of investing in artificial intelligence (“AI”) and machine learning systems  
 4 supposedly designed to scan and monitor all communications on the app and prevent the sharing  
 5 of inappropriate content and personally identifiable information.<sup>130</sup>

6           127. Yet this technology has proven grossly inadequate and insufficient to protect  
 7 children. For example, Roblox’s filters have inexplicable omissions. While Roblox blocks certain  
 8 words, like “Snap” and “Snapchat,” to supposedly prevent off-app communications, it allows  
 9 workarounds such as the use of the ghost emoji (👻), which is widely recognized as a symbol for  
 10 Snapchat, or alternative spellings, like “Snappy” or “apchat.” Similarly, while the word “Discord”  
 11 is blocked, users can bypass this filter by using the disc emoji (🍷) or typing variations, like  
 12 “iscord” or “cord.”<sup>131</sup> That Roblox selectively blocks the words “Snap,” “Snapchat,” and “Discord”  
 13 reveals that Roblox is fully aware of the dangers of off-app inappropriate communications yet  
 14 chooses not to close these loopholes. And while Roblox prevents users from sharing phone numbers  
 15 in numerical format, it does nothing to stop users from spelling out the numbers.<sup>132</sup>

16           128. Similarly, while Roblox attempts to block the word “condo”—a term that, until  
 17 recently, was widely used to identify sexualized experiences—countless external groups on  
 18 platforms like Reddit and Discord are dedicated to helping users locate new explicit content on  
 19 Roblox. As soon as Roblox removes one game, its ineffective safeguards allow the same game to  
 20 be reuploaded almost immediately from a new account, perpetuating the cycle of explicit and  
 21 harmful content. External groups have capitalized on Roblox’s weak moderation by guiding  
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 25 <sup>129</sup> Q1 2021 Earnings Call (May 11, 2021).

26 <sup>130</sup> Roblox, *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).

27 <sup>131</sup> Edwin Dorsey, *Problems at Roblox (RBLX) #5*, The Bear Cave (Oct. 17, 2024),  
<https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

28 <sup>132</sup> *Id.*

1 predators to these reuploaded games, with Fast Company easily identifying 150 Discord groups  
 2 dedicated to exploiting Roblox's lack of robust enforcement.<sup>133</sup>

3 129. Beyond Roblox's ineffective technology, the company also employs a woefully  
 4 inadequate number of human moderators to analyze and manage content on its platform. With only  
 5 about 3,000 moderators, Roblox pales in comparison to platforms like TikTok, which, despite  
 6 having only three times the number of users, employs more than ten times the number of  
 7 moderators at 40,000.<sup>134</sup> Roblox attempts to justify this disparity by claiming "[y]ou really can't  
 8 judge the quality of these moderation systems by the number of people."<sup>135</sup> But the reality tells a  
 9 different story. Roblox's moderators, many of them overseas contractors, report being  
 10 overwhelmed by an unmanageable volume of child safety reports, making it impossible to address  
 11 all concerns effectively and leaving countless safety issues unresolved.<sup>136</sup>

12 130. Even the safety data that Roblox touts is flawed and only underscores the growing  
 13 dangers created by the company's app. For example, Roblox proudly points to its low percentage  
 14 of reports to the National Center for Missing and Exploited Children ("NCMEC")—the leading  
 15 U.S. nonprofit organization tasked with preventing child exploitation and assisting in the recovery  
 16 of missing children. Roblox claims that it accounts for less than .04% of reports made to  
 17 NCMEC.<sup>137</sup> But this data is entirely self-reported and therefore depends on Roblox's ineffective  
 18 content moderation and safety team. This self-reported data to NCMEC—flawed and limited as it  
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22 <sup>133</sup> Burt Helm, Sex, Lies and Video Games: *Inside Roblox's War on Porn*, Fast Company (Aug.  
 23 19, 2020), <https://www.fastcompany.com/90539906/sex-lies-and-video-games-inside-roblox-war-on-porn>.

24 <sup>134</sup> Carville & D'Anastasio, *supra* note 8.

25 <sup>135</sup> Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety*  
 26 *Features, Past Cases of Child Abuse on the Platform*, WBUR (Nov. 18, 2024),  
<https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features>.

27 <sup>136</sup> Carville & D'Anastasio, *supra* note 8.

28 <sup>137</sup> 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>.

1 is—also reveals a disturbing trend: Roblox’s reports about suspected child sexual exploitation have  
2 surged over the years, from 675 reports in 2019 to 13,316 reports in 2023.<sup>138</sup>

3 131. Roblox also boasts that just “0.0063% of [its] total content was flagged for  
4 violating” policies. But Roblox itself controls the systems responsible for identifying and flagging  
5 violative content.<sup>139</sup> These lower percentages are thus a reflection not of safety but of Roblox’s  
6 ability to minimize the appearance of problems through its own inadequate reporting and  
7 enforcement mechanisms. By hiding behind self-serving metrics and refusing to take meaningful  
8 action, Roblox has fostered an environment where children are subjected to irreparable harm while  
9 the company continues to reap financial rewards.

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

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23 <sup>138</sup> National Center for Missing & Exploited Children, *2019 CyberTipline Reports by Electronic*  
24 *Services Providers (ESP)*, [https://www.missingkids.org/content/dam/missingkids/pdfs/2019-](https://www.missingkids.org/content/dam/missingkids/pdfs/2019-reports-by-esp.pdf)  
25 [reports-by-esp.pdf](https://www.missingkids.org/content/dam/missingkids/pdfs/2019-reports-by-esp.pdf); *see also* National Center for Missing & Exploited Children, *2023 CyberTipline*  
26 *Reports by Electronic Services Providers (ESP)*,  
<https://www.missingkids.org/content/dam/missingkids/pdfs/2023-reports-by-esp.pdf>.

27 <sup>139</sup> Vikki Blake, *Roblox Reported Over 13,000 Incidents to the National Center for Missing and*  
28 *Exploited Children in 2023*, GamesIndustry.biz (Jul. 23, 2024),  
[https://www.gamesindustry.biz/roblox-reported-over-13000-incidents-to-the-national-center-for-](https://www.gamesindustry.biz/roblox-reported-over-13000-incidents-to-the-national-center-for-missing-and-exploited-children-in-2023)  
[missing-and-exploited-children-in-2023](https://www.gamesindustry.biz/roblox-reported-over-13000-incidents-to-the-national-center-for-missing-and-exploited-children-in-2023).



133. Roblox’s own developers even admit that Roblox is unsafe for children.<sup>140</sup> Online forum discussion posts are replete with developers writing that they would not allow their own children to use the platform, citing pervasive issues with Roblox’s child safety policies. Many of these posts highlight the platform’s systemic failures and suggest straightforward changes Roblox could implement to create a safer environment but has consistently ignored—for example:

- 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.”<sup>141</sup>
- 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.”<sup>142</sup>
- 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.”<sup>143</sup>
- 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.”<sup>144</sup>

134. 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.

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<sup>140</sup> Edwin Dorsey, *Problems at Roblox (RBLX) #5*, The Bear Cave (Oct. 17, 2024), <https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

<sup>141</sup> *Id.*

<sup>142</sup> *Id.*

<sup>143</sup> *Id.*

<sup>144</sup> *Id.*

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

135. 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 platform of being a “pedophile hellscape for kids.”<sup>145</sup> Released on October 8, 2024, the report sparked public outrage, detailing many of the issues described above that Roblox had long ignored.

136. A little more than a month later, Roblox announced a series of changes, including permanently removing the ability to message others outside of games on its app for under 13-year-old users;<sup>146</sup> giving parents a separate dashboard where they can monitor a child’s Roblox account, view the child’s friend list, set spending control, and manage screen time;<sup>147</sup> preventing games from using chalkboard writings where people could get around the censoring of communications;<sup>148</sup> and implementing restrictions to stop under 13-year-old users from accessing new Roblox games that are awaiting maturity ratings.<sup>149</sup>

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

138. And these changes are little more than window dressing—too little, too late, and woefully inadequate. Most fundamentally, Roblox *still allows* adults to contact and message children. Roblox only banned user-to-user messaging for users under the age of 13 *outside of games*. Predators can still message children on public chats while playing games; indeed, Roblox

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<sup>145</sup> Hindenburg Research, *supra* note 1.

<sup>146</sup> *Roblox Tightens Messaging Rules for Under-13 Users Amid Abuse Concerns*, Reuters (Nov. 18, 2024), <https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/>.

<sup>147</sup> Robert Booth, *Roblox to Give Parents More Control Over Children’s Activity After Warnings Over Grooming*, The Guardian, (Nov. 18, 2024), <https://www.theguardian.com/technology/2024/nov/18/roblox-to-hand-parents-more-control-over-their-childrens-activity>.

<sup>148</sup> *Id.*

<sup>149</sup> *Id.*

1 has left child predators’ blueprint for finding children on the application intact since predators have  
2 always found children by playing games they know that children will frequent.

3 139. Roblox also failed to address core issues like the app’s lack of age verification and  
4 refusal to require parental consent to make an account. The restrictions described above work only  
5 if children correctly state their age during sign-up. Any child can easily bypass them—including  
6 parental controls and limits on messaging—by lying about their birthday. Roblox likewise did not  
7 commit to hiring more moderators or increasing its trust and safety budget, nor did it implement  
8 any sort of identity check to prevent registered sex offenders from making accounts.

9 140. In fact, recently, in April 2025, a research firm in the U.K. demonstrated just how  
10 easy it still is for predators to find children and move the conversation to another application, such  
11 as Snapchat or Discord, despite Roblox’s ban on direct messaging with users under the age of 13.<sup>150</sup>  
12 Because Roblox still allows adult users to message children *in games*, predators can use the public  
13 chat functions in games to groom child users and ask for their usernames on other platforms. And,  
14 for chat within games, Roblox’s default settings for children under the age of 13 is to allow  
15 “everyone” to chat with these children, seamlessly facilitating predators’ access to children.<sup>151</sup> The  
16 key findings from this report included that “[a]dults and children can chat with no obvious  
17 supervision” and that “[t]he safety controls that exist are limited in their effectiveness and there are  
18 still significant risks for children on the platform.”<sup>152</sup>

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26 <sup>150</sup> Revealing Reality, *A Digital Playground: The Real Guide to Roblox* (Apr. 13, 2025),  
<https://think.revealingreality.co.uk/roblox-real-guide>.

27 <sup>151</sup> 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).

<sup>152</sup> Revealing Reality, *supra* note 150.



*In April 2025, a research agency demonstrated how easy it was for a 42-year-old account to find a five-year-old user on Roblox and get the child to move the conversation to Snapchat.*<sup>153</sup>

141. Just as Roblox rolled out these changes, it simultaneously introduced a new “Parties” feature in an attempt to counteract any potential loss in user engagement.<sup>154</sup> Because Roblox knew that users often turned to other apps like Discord to communicate while playing video games and because Roblox knew that its safety changes would reduce key user engagement metrics, it sought to capture that traffic (and revenue) and replace any loss of engagement with the Parties feature. While the Parties feature is currently available only for users aged 13 and older, such limitations are hollow without robust age verification. And the fact that Roblox has stated that it is exploring making such a feature available to younger users demonstrates that, far from prioritizing safety, Roblox’s real focus is protecting its bottom-line.<sup>155</sup>

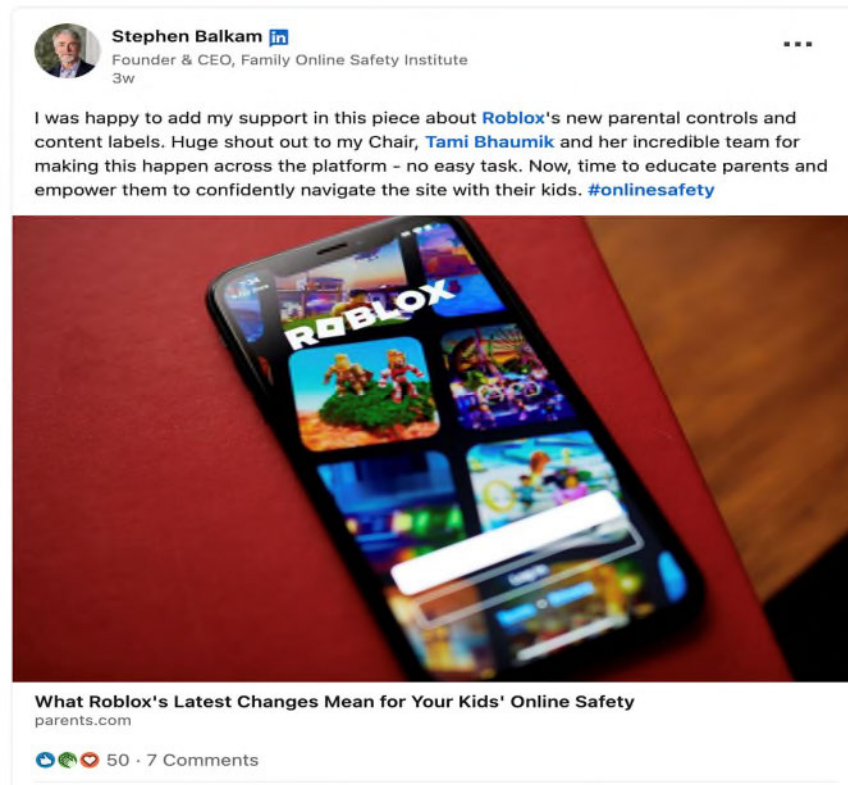
142. Roblox has also engaged in a deceptive public relations campaign using ostensibly independent online safety organizations to influence the narrative around these changes. For instance, Roblox has leveraged its ties to groups like the Family Online Safety Institute (“FOSI”). An online parenting magazine favorably quoted Stephen Balkam, FOSI’s CEO, as endorsing

<sup>153</sup> *Id.*

<sup>154</sup> Rebecca Ruiz, *Roblox’s New Party Feature Makes Discord Obsolete*, Mashable (Dec. 2, 2024), <https://mashable.com/article/roblox-party-discord>.

<sup>155</sup> *Id.*

1 Roblox's new features as a win for child safety.<sup>156</sup> What the article omitted, however, is that  
 2 Roblox's own Vice President of Civility and Partnerships, Tami Bhaumik, serves as FOSI's board  
 3 chair—an obvious conflict of interest.<sup>157</sup> This calculated relationship exposes how Roblox  
 4 manipulates public perception by using seemingly independent safety organizations as  
 5 mouthpieces to shape the narrative in its favor.



18 *Stephen Balkam's LinkedIn post revealing his connection to Roblox in a post*  
 19 *praising Roblox's changes.*<sup>158</sup>

20 143. Most recently, in April 2025, Roblox repeated this same deceptive playbook of  
 21 bragging about new safety features that, in reality, are glaringly deficient. This update included  
 22 three new features: first, allowing parents to block children from playing specific games; second,  
 23

24  
 25 <sup>156</sup> 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>.

26 <sup>157</sup> *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>.

27 <sup>158</sup> LinkedIn, Stephen Balkam's Post, [https://www.linkedin.com/posts/stephenbalkam\\_what-robloxs-latest-changes-mean-for-your-activity-7264409332950220801-WCDF](https://www.linkedin.com/posts/stephenbalkam_what-robloxs-latest-changes-mean-for-your-activity-7264409332950220801-WCDF) (last visited Jan. 6, 2025).  
 28

1 granting parents the power to block people on their child’s friends list; and third, giving parents  
2 visibility into the games that their child spends the most time in.<sup>159</sup>

3 144. None of these parental controls address the underlying deficiency with Roblox that  
4 facilitates grooming and predation on children—adult access to and communication with children.  
5 Without allowing parents to see who their child is messaging and what the messages say, parents  
6 lack the information necessary to determine which accounts to block on their child’s friend list. A  
7 list of the top twenty games that a child plays does not tell a parent which games children are  
8 interacting with adults in. Moreover, blocking specific games is ineffective when, as discussed  
9 above, inappropriate games are re-posted as soon as they are taken down. Indeed, barely a week  
10 later, the U.K. research firm discussed above demonstrated just how easy it is for adults to continue  
11 to find children, groom them, and then move the communications off Roblox, even after Roblox  
12 announced these safety updates.<sup>160</sup>

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

15 146. Roblox’s deceptive playbook would not be complete without a misleading public  
16 relations campaign, where industry-funded safety “experts” praise Roblox’s safety update. For  
17 example, Roblox’s press release announcing these updates quotes Larry Magid, the CEO of  
18 ConnectSafely, as saying, “Roblox has consistently provided parents with tools that enable their  
19 children to enjoy the platform, while helping protect them against online risks. These new friend-  
20 and experience-blocking tools provide parents with even more ways to help ensure their children  
21 are using it safely. Safety, fun, and adventure are not mutually exclusive.”<sup>161</sup> What the press release  
22  
23  
24

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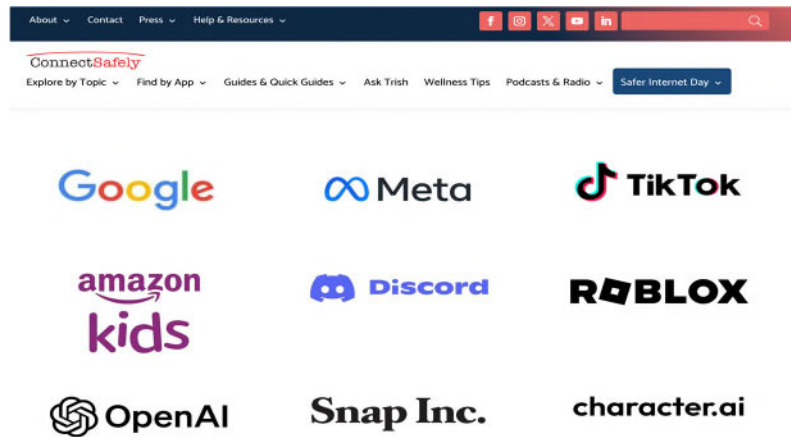
25  
26 <sup>159</sup> Matt Kaufman, *New Tools for Parents to Personalize Their Child’s Experience on Roblox*,  
27 ROBLOX (Apr. 2, 2025), <https://corp.roblox.com/newsroom/2025/04/new-parental-controls-on-roblox>.

28 <sup>160</sup> *A Digital Playground: The Real Guide to Roblox*.

<sup>161</sup> Matt Kaufman, *New Tools for Parents to Personalize Their Child’s Experience on Roblox*.



1 did not say is that ConnectSafely—a non-profit ostensibly focused on educating people about  
 2 internet safety—is funded by tech companies and lists Roblox as one of its “supporters.”<sup>162</sup>



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11 *ConnectSafely’s list of supporters on its website.*

12 147. A few weeks later, Magid was quoted again in praise of Roblox, this time in a  
 13 *Newsweek* article championing Roblox as a “trusted playground” for kids: “I would put them very  
 14 high up on the list of companies that seem to care. They actually have a vice president of civility.  
 15 It’s unheard of to have somebody at that level of the company that focuses on civility. They really  
 16 work very hard to make it a friendly, comfortable, civil environment for young people.”<sup>163</sup> Again,  
 17 this article made no mention of Magid’s organization’s financial ties to Roblox.

18 148. FOSI CEO Stephen Balkam was also quoted in the *Newsweek* piece, claiming that  
 19 Roblox was “top-of-class” for its safety features and even repeating Roblox’s own party line that  
 20 safety is “part of [Roblox’s] DNA.”<sup>164</sup> Again, this article omitted FOSI’s ties to Roblox, financial  
 21 and otherwise, thereby deceptively pushing a narrative of Roblox as a “safe” application for kids.  
 22  
 23  
 24

25 <sup>162</sup> ConnectSafely, *Supporters*, <https://connectsafely.org/about-us/supporters/> (last accessed May  
 26 10, 2025).

27 <sup>163</sup> 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>.

28 <sup>164</sup> *Id.*

1     **V.   PLAINTIFF-SPECIFIC ALLEGATIONS**

2           149.   Plaintiff is a 15-year-old girl who was an avid Roblox user. She was horrifically and  
3 traumatically manipulated, groomed, sexually exploited, and sexually abused by a violent and  
4 depraved predator, who posed as a fellow minor, through Defendant's dangerous app, which  
5 enabled and facilitated this predator's heinous crimes. As the result of Defendant's reckless  
6 disregard for child safety, Plaintiff has suffered devastating and life-altering psychological trauma.  
7 Her life will never be the same.

8           150.   Plaintiff was approximately 10 years old when she began playing on Roblox.  
9 Plaintiff's mother trusted that Roblox was a safe place for Plaintiff to communicate with her friends  
10 because it was designed and marketed for kids. Plaintiff's mother understood Roblox to be a  
11 platform designed for children to play games with one another. Upon reviewing Roblox's app on  
12 Plaintiff's iPad, Plaintiff's mother saw innocent-looking colorful avatars playing games for  
13 children, which she relied on to determine that the app was safe for children. As discussed above,  
14 Roblox spent considerable time and money publicly touting the safety and security of the app,  
15 which created the public perception that Roblox had created a safe environment for kids.  
16 Unbeknownst to Plaintiff's mother at the time, this was nothing more than a false façade of safety.

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

22           152.   In reality, Roblox deliberately misled parents while knowing its platform facilitated  
23 predatory behavior. By this time, Roblox had long been aware—from countless police reports and  
24 incidents reported in the media—that its app was widely used by predators to target, groom, and  
25 sexually assault children. Roblox specifically knew from numerous tragic events that occurred in  
26 the real world that predators target and manipulate children on its app by lying about their age. Yet  
27 rather than warn parents or take other measures to protect children from harm, Roblox continued  
28

1 with its deceptive campaign to portray the app as safe for children and to conceal information that  
2 it knew about the pervasive predatory conduct that its app enabled and facilitated.

3 153. Around July 2020, when Plaintiff was a vulnerable 10-year-old, she was targeted on  
4 Roblox by a predator who deliberately posed as a fellow minor to exploit Plaintiff's age and  
5 vulnerability. The predator methodically cultivated a false emotional connection with Plaintiff by  
6 promising friendship and connection. When the predator learned Plaintiff's true age, rather than  
7 ending contact, he explicitly told Plaintiff that he "didn't care" that she was only 10 years old.

8 154. The predator continued to foster an emotionally manipulative relationship with  
9 Plaintiff through Defendant's chat messaging feature, which Roblox designed to allow unrestricted  
10 private communications between users regardless of age. The predator began by engaging Plaintiff  
11 in seemingly innocent conversation to make Plaintiff feel comfortable and establish trust. Once the  
12 predator had sufficiently gained Plaintiff's confidence, he escalated the conversations to  
13 increasingly sexual topics and explicit exchanges. Throughout the course of the abuse, the predator  
14 repeatedly promised to give Plaintiff Roblox in-game gifts in order to maintain control over her  
15 and ensure her continued compliance.

16 155. Once the predator had sufficiently groomed Plaintiff and gained her trust, he began  
17 sending her sexually explicit photos of his genitalia and requested that Plaintiff do the same. The  
18 predator also manipulated Plaintiff into sharing her phone number, home address, and her mother's  
19 personal information.

20 156. The predator eventually coerced Plaintiff into sending him nude photographs of  
21 herself. The predator escalated his abuse tactics even further in August 2020 when he attempted to  
22 transition from online exploitation to physical exploitation, trying to convince Plaintiff to leave her  
23 grandmother's home and meet him at a nearby train station. The predator's plans were thwarted  
24 only by Plaintiff's grandmother, who prevented Plaintiff from leaving the home.

25 157. A few months later, having successfully conditioned Plaintiff through months of  
26 grooming and manipulation, the predator convinced Plaintiff to meet him in-person. In October  
27 2020, when Plaintiff was still only 10 years old, the predator coerced Plaintiff to meet in person.  
28 Plaintiff, believing she was meeting someone she could trust, snuck out of her home in the middle

1 of the night. The predator then transported Plaintiff to a local motel where she was sex trafficked  
2 and violently raped by five men, including the predator.

3 158. Plaintiff, a 10-year-old child, was subjected to hours of brutal sexual assault by  
4 multiple adult men in what can only be described as a coordinated attack that these predators had  
5 planned and orchestrated.

6 159. Plaintiff's mother noticed that Plaintiff was missing in the middle of the night and  
7 filed a report with the police department. Plaintiff's mother only learned of the extent of her  
8 daughter's horrific sexual abuse when the police responded to a call from a motel worker who had  
9 found Plaintiff walking the hallways. The motel worker called the police, who responded to the  
10 scene and returned Plaintiff home to her mother.

11 160. Following the horrific sexual abuse, Plaintiff was forced to endure additional trauma  
12 through the criminal investigation process. The following day, Plaintiff, who had just been raped  
13 by five men, was subjected to traumatizing interviews with police officers and an invasive sexual  
14 assault forensic examination at a local hospital. The Chicago Police Department eventually  
15 apprehended the original predator and two of the other predators who had violently raped Plaintiff  
16 at the motel. However, the other two predators who participated in the sexual assault of Plaintiff  
17 remain at large, meaning Plaintiff lives with the knowledge that two of her rapists have never been  
18 held accountable and could potentially harm her, or other children, again.

19 161. Plaintiff has suffered profound harm from the grooming, manipulation, and sexual  
20 abuse that she experienced because of Defendant's tortious conduct. She was subjected to  
21 significant emotional and psychological injuries, including anxiety, depression, suicidal ideation,  
22 and self-harm. Plaintiff had to receive intensive medical treatment. Plaintiff continues to grapple  
23 with her trauma and has moments of disassociation. She has suffered severe social isolation, a loss  
24 of extracurricular activities which previously brought her joy, and, most of all, a loss of innocence  
25 and security.

26 162. Defendant is directly responsible for the immense harm that Plaintiff has suffered.  
27 Had Plaintiff's mother known the truth about Defendant's app, she never would have permitted  
28 Plaintiff to use Roblox without strict supervision. Had Defendant implemented even the most basic

1 system of screening or age and identity verification, as well as other commonsense safety measures,  
2 Plaintiff would never have interacted with this predator and suffered the harm she did. Plaintiff's  
3 life has been immeasurably devastated as a direct result of Roblox's conduct.

4 **VI. CAUSES OF ACTION**

5 **FIRST CAUSE OF ACTION**

6 **FRAUDULENT CONCEALMENT AND MISREPRESENTATION**

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

8 163. Plaintiff incorporates each and every factual allegation set forth above.

9 164. This claim is brought against Defendant Roblox.

10 165. As set forth in more detail above, Defendant knew about the defective conditions of  
11 its app and that the app posed serious safety risks to child users. Instead of disclosing the truth,  
12 Defendant engaged in a widespread public campaign to tout the safety of its platform in the media,  
13 and in the materials provided to potential users of the app, as described above.

14 166. Defendant made numerous false representations about the safety of Roblox, as  
15 described above, which were specific and widespread. Plaintiff and the public at large relied on  
16 Defendant's false representations in deciding to allow children to play on the app.

17 167. Defendant was under a duty to tell the public, users, and their parents the truth and  
18 to disclose the defective conditions of its app and that the app posed serious safety risks to child  
19 users because Defendant possessed superior knowledge about the dangers of its app through  
20 internal reviews, external studies known to Defendant, and parent and police reports made to  
21 Defendant.

22 168. Defendant breached its duty to the public, users, and their parents by concealing and  
23 failing to disclose the serious safety risks presented by its app. Even though Defendant knew of  
24 those risks based on Defendant's internal reviews, external studies known to Defendant, and parent  
25 and police reports made to Defendant, it intentionally concealed those risks to not lose users and  
26 revenue, and to induce parents to allow their children to use its app. Such risks were known only  
27 to Defendant, and the public, users, and their parents, including Plaintiff's mother, could not have  
28 discovered such serious safety risks.

1           169. The public, users, and their parents, including Plaintiff's mother, did not know of  
2 the serious safety risks posed by the design of Defendant's app, which were known by Defendant.

3           170. By intentionally concealing and failing to disclose defects inherent in the design of  
4 its app, Defendant knowingly and recklessly misled the public, users, and their parents, including  
5 Plaintiff's mother, into believing its app was safe for children to use.

6           171. Defendant knew that its concealment, omissions, and misrepresentations were  
7 material. A reasonable person, including Plaintiff's mother, would find information about the risk  
8 of grooming, sexual abuse, sexual exploitation, and other serious risks associated with the use of  
9 Defendant's app, to be important when deciding whether to allow children to use it.

10           172. Defendant intended to deceive the public, users, and their parents, including  
11 Plaintiff's mother, by making misrepresentations and concealing the defects in the design of its  
12 app, which made the app unsafe.

13           173. As a direct and proximate result of Defendant's concealment of material information  
14 and misrepresentations, Plaintiff's mother was not aware and could not have been aware of the  
15 facts that Defendant concealed, and therefore justifiably and reasonably believed that Defendant's  
16 app was safe for children to use.

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

20           175. As a direct and proximate result of Defendant's concealment of material information  
21 and misrepresentations, Plaintiff sustained serious injuries and harm.

22           176. Defendant's concealment of material information and misrepresentations were a  
23 substantial factor in causing harm to Plaintiff.

24           177. Defendant's conduct, as described above, was intentional, willful, wanton, reckless,  
25 malicious, oppressive, extreme, and outrageous, and displayed an entire want of care and a  
26 conscious and depraved indifference to the consequences of its conduct, including to the health,  
27 safety, and welfare of its customers, and warrants an award of punitive damages in an amount  
28 sufficient to punish Defendant and deter others from like conduct.



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

4 **SECOND CAUSE OF ACTION**

5 **NEGLIGENT MISREPRESENTATION**

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

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

8 180. This claim is brought against Defendant Roblox.

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

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

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

19 184. Defendant Roblox's representations that its app was safe for use by children were  
20 not true.

21 185. Defendant Roblox had no reasonable grounds for believing its representations that  
22 its app was safe for use by children were true.

23 186. By concealing and failing to disclose, or failing to take reasonable care to disclose  
24 the defects, Defendant Roblox negligently misled the public, users, and their parents, including  
25 Plaintiff's mother, into believing its app was safe for children to use.

26 187. By making numerous material representations downplaying any potential harm  
27 associated with its app and reassuring the public, users, and their parents, including Plaintiff's  
28

1 mother, that its app was safe, Defendant Roblox negligently misled the public, users, and their  
2 parents, including Plaintiff's mother, into believing its app was safe for children to use.

3 188. As a direct and proximate result of Defendant Roblox's material omissions,  
4 misrepresentations, and concealment of material information, Plaintiff's mother was not aware and  
5 could not have been aware of the facts that Defendant Roblox concealed or misstated, and therefore  
6 justifiably and reasonably believed that Defendant Roblox's app was safe for use.

7 189. As a direct and proximate result of Defendant Roblox's material omissions,  
8 misrepresentations, and concealment of material information, Plaintiff sustained serious injuries  
9 and harm.

10 190. Defendant Roblox's concealment and Plaintiff's mother's reliance on Defendant  
11 Roblox's representations about the safety of its app were substantial factors in causing harm to  
12 Plaintiff.

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

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

21 **THIRD CAUSE OF ACTION**

22 **NEGLIGENCE – GENERAL**

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

24 193. Plaintiff incorporates each and every factual allegation set forth above.

25 194. This claim is brought against Defendant Roblox.

26 195. At all relevant times, Defendant developed, set up, managed, maintained, operated,  
27 marketed, advertised, promoted, supervised, controlled, and benefited from its app used by  
28 Plaintiff.

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

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

- 13           a. As businesses, Defendant owes a duty to protect customers against reasonably  
14           foreseeable criminal acts of third parties and other dangers known to Defendant on  
15           its app;
- 16           b. Plaintiff, a minor, was vulnerable and dependent on Defendant for a safe  
17           environment on its app, and Defendant has superior ability and control to provide  
18           that safety with respect to activities that it sponsors or controls;
- 19           c. Plaintiff relied upon Defendant for protection against third-party misuse or  
20           misconduct;
- 21           d. The special relationship Plaintiff had with Defendant substantially benefits  
22           Defendant through profits and growth in users and user activity. Defendant could  
23           not successfully operate without the growth in users and user activity generated by  
24           children;
- 25           e. Defendant was far more to Plaintiff than a business. Defendant provided Plaintiff  
26           with opportunities for social interaction and a discrete community of other users.  
27           Plaintiff was dependent on Defendant to provide structure, guidance, and a safe  
28           environment;

1 f. Defendant has superior control over its app environment and the ability to protect  
2 its users. Defendant imposes a variety of rules and restrictions to supposedly  
3 maintain a safe and orderly environment. Defendant employs internal staff to  
4 enforce these rules and restrictions and can monitor and discipline users when  
5 necessary. Defendant has the power to influence Plaintiff's values, consciousness,  
6 relationships, and behaviors; and

7 g. Defendant has voluntarily undertaken a responsibility to keep children safe on its  
8 app. As alleged above, Defendant has publicly stated that it takes steps to keep  
9 children safe on its app and therefore has undertaken a duty to act reasonably in  
10 taking such steps.

11 198. Plaintiff was a foreseeable user of Defendant's app.

12 199. Defendant knew that minors such as Plaintiff would use its app.

13 200. Defendant invited, solicited, encouraged, or reasonably should have foreseen the  
14 fact, extent, and manner of Plaintiff's use of its app.

15 201. Defendant knew or, by the exercise of reasonable care, should have known, that the  
16 reasonably foreseeable use of its app (as developed, set up, managed, maintained, supervised, and  
17 operated by Defendant) was dangerous, harmful, and injurious when used by youth such as Plaintiff  
18 in a reasonably foreseeable manner.

19 202. At all relevant times, Defendant knew or, by the exercise of reasonable care, should  
20 have known that its app (as developed, set up, managed, maintained, supervised, and operated by  
21 Defendant) posed unreasonable risks of harm to youth such as Plaintiff, which risks were known  
22 and knowable, including in light of the internal data and knowledge Defendant had regarding its  
23 app.

24 203. Defendant knew, or by the exercise of reasonable care, should have known, that  
25 ordinary child users of its app, such as Plaintiff, would not have realized the potential risks and  
26 dangers of using the app, including a risk of grooming, sexual abuse, and sexual exploitation, which  
27 foreseeably can lead to a cascade of negative effects, including but not limited to physical injury,  
28 damage to self-worth, stigma and social isolation, reduced academic performance, increased risky

1 behavior, susceptibility to future sexual exploitation, attachment issues, identity confusion, and  
2 profound mental health issues for young consumers, including but not limited to depression,  
3 anxiety, suicidal ideation, self-harm, post-traumatic stress disorder, insomnia, eating disorders,  
4 death, and other harmful effects.

5 204. Defendant's conduct was closely connected to Plaintiff's injuries, which were  
6 highly certain to occur, as evidenced by the significance of Plaintiff's injuries.

7 205. Defendant could have avoided Plaintiff's injuries with minimal cost, including, for  
8 example, by not including certain features in its app which harmed Plaintiff.

9 206. Imposing a duty on Defendant would benefit the community at large.

10 207. Imposing a duty on Defendant would not be burdensome because it has the  
11 technological and financial means to avoid the risks of harm to Plaintiff.

12 208. Defendant owed a heightened duty of care to youth users of its app because  
13 children's brains are not fully developed, meaning young people are more neurologically  
14 vulnerable than adults to abusive contact facilitated by Defendant's app because they have a hard  
15 time distinguishing between patterns of genuine friendship and grooming relationships.

16 209. Defendant breached its duties of care owed to Plaintiff through its affirmative  
17 malfeasance, actions, business decisions, and policies in the development, set up, management,  
18 maintenance, operation, marketing, advertising, promotion, supervision, and control of its app.  
19 These breaches are based on Defendant's own actions in managing its own app made available to  
20 the public, independent of any actions taken by a third party. Those breaches include but are not  
21 limited to:

- 22 a. Including features in its app that, as described above, are currently structured  
23 and operated in a manner that unreasonably creates or increases the foreseeable  
24 risk of grooming, sexual abuse, and sexual exploitation to youth, including  
25 Plaintiff;
- 26 b. Including features in its app that, as described above, are currently structured  
27 and operated in a manner that unreasonably creates or increases the foreseeable  
28 risk of harm to the physical and mental health and well-being of youth users,

1 including Plaintiff, including but not limited to physical injury, damage to self-  
 2 worth, stigma and social isolation, reduced academic performance, increased  
 3 risky behavior, susceptibility to future sexual exploitation, attachment issues,  
 4 identity confusion, and profound mental health issues for young consumers,  
 5 including but not limited to depression, anxiety, suicidal ideation, self-harm,  
 6 post-traumatic stress disorder, insomnia, eating disorders, death, and other  
 7 harmful effects;

8 c. Maintaining unreasonably dangerous features in their apps after notice that such  
 9 features, as structured and operated, posed a foreseeable risk of harm to the  
 10 physical and mental health and well-being of youth users;

11 d. Facilitating unsupervised and/or hidden use of its app by youth, including by  
 12 adopting protocols that allow youth users to change their own safety settings or  
 13 parental controls, and create multiple and private accounts; and

14 e. Inviting young children on its app and marketing to young children when  
 15 Defendant knew that the app, as designed, was not safe for young children.

16 210. Defendant breached its duties of care owed to Plaintiff through its nonfeasance,  
 17 failure to act, and omissions in the development, setup, management, maintenance, operation,  
 18 marketing, advertising, promotion, supervision, and control of its app. These breaches are based on  
 19 Defendant's own actions in managing its own app made available to the public, independent of any  
 20 actions taken by a third party. Those breaches include but are not limited to:

- 21 a. Failing to implement effective parental controls;
- 22 b. Failing to screen users before allowing them on the app;
- 23 c. Failing to implement effective parental notifications, such as when a child  
 24 messages another user, particularly an adult user, or when a child interacts with  
 25 accounts that have been blocked by other users or suspended in the past;
- 26 d. Failing to require adult users to provide a phone number when signing up for an  
 27 account;



- e. Failing to implement pop-up safety notices within chats and games to warn users about inappropriate behavior;
- f. Failing to ban IP and MAC addresses of accounts associated with known abusers;
- g. Failing to set default safety settings to the most protective options;
- h. Having an open chat function;
- i. Failing to provide a transcript of a child's communications to the parent;
- j. Failing to implement reasonably available means to monitor for, report, and prevent the use of their apps by sexual predators to victimize, abuse, and exploit youth users;
- k. Failing to provide effective mechanisms for youth users and their parents/guardians to report abuse or misuse of their apps;
- l. Failing to implement effective protocols to verify ages and identity of all users;
- m. Failing to place reasonable age restrictions on the app;
- n. Failing to separate adults from children on the app by, for example, creating a separate app for children;
- o. Failing to adequately fund its trust and safety program; and
- p. Others as set forth herein.

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

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

213. As a direct and proximate result of Defendant's breach of one or more of its duties, Plaintiff was harmed. Such harms include the sexual exploitation of Plaintiff by a child predator and a cascade of resulting negative effects, including but not limited to damage to self-worth, stigma and social isolation, reduced academic performance, increased risky behavior, susceptibility

1 to future sexual exploitation, attachment issues, identity confusion, and profound mental health  
2 issues such as depression, anxiety, and other harmful effects.

3 214. Defendant's breach of one or more of its duties was a substantial factor in causing  
4 harms and injuries to Plaintiff.

5 215. The nature of the fraudulent and unlawful acts that created safety concerns for  
6 Plaintiff are not the type of risks that are immediately apparent from using Defendant's app.

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

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

15 **FOURTH CAUSE OF ACTION**

16 **NEGLIGENCE – FAILURE TO WARN**

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

18 218. Plaintiff incorporates each and every factual allegation set forth above.

19 219. This claim is brought against Defendant Roblox.

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

23 221. Plaintiff was a foreseeable user of Defendant's app.

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

27 223. Defendant knew, or by the exercise of reasonable care, should have known, that  
28 ordinary minor users, such as Plaintiff, would not have realized the potential risks and dangers of

1 its app, including a risk of grooming, sexual abuse, and sexual exploitation, which can lead to a  
2 cascade of harms. Those harms include but are not limited to physical injury, damage to self-worth,  
3 stigma and social isolation, reduced academic performance, increased risky behavior, susceptibility  
4 to future sexual exploitation, attachment issues, identity confusion, and profound mental health  
5 issues for young consumers, including but not limited to depression, anxiety, suicidal ideation, self-  
6 harm, post-traumatic stress disorder, insomnia, death, and other harmful effects.

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

9       225. Defendant knew or, by the exercise of reasonable care, should have known that its  
10 app posed risks of harm to youth. These risks were known and knowable in light of Defendant's  
11 own internal data and knowledge regarding its app at the time of development, design, marketing,  
12 promotion, advertising, and distribution to Plaintiff.

13       226. Because Defendant's conduct created the risk that child users of their apps would  
14 be subject to grooming, sexual abuse, and sexual exploitation, Defendant owed a duty to all  
15 reasonably foreseeable users, including but not limited to minor users and their parents, to provide  
16 adequate warnings about the risk of using Defendant's app that were known to Defendant, or that  
17 Defendant should have known through the exercise of reasonable care.

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

20       228. Defendant owed a heightened duty of care to minor users and their parents to warn  
21 about its app's risks because children's brains are not fully developed, resulting in a diminished  
22 capacity to make responsible decisions regarding contact with strangers online. Children are also  
23 more neurologically vulnerable than adults to abusive contact facilitated by Defendant's app  
24 because they have a hard time distinguishing between patterns of genuine friendship and grooming  
25 relationships.

26       229. Defendant breached its duty by failing to use reasonable care in providing adequate  
27 warnings to Plaintiff, such as failing to notify parents and the general public of the following,  
28 among others:

- a. Defendant fails to require that children have parental approval before signing up for an account;
- b. Defendant fails to screen users before allowing them on the app;
- c. New users of Defendant's app can identify themselves as minors, begin to use the app, and do so indefinitely, without ever receiving a safety warning, and without ever having to provide information so that Defendant can warn the users' parents or guardians;
- d. Defendant's app's default safety settings allow adults and other strangers' accounts to find, "friend," and communicate with children's accounts;
- e. Defendant's parental control settings allowed children to modify their own parental control settings;
- f. Defendant's app recommends that adult users and other strangers "friend" and contact child accounts;
- g. Defendant fails to block the IP and MAC addresses of known abusers;
- h. Adult predators use Defendant's app to target children for sexual exploitation, sextortion, and CSAM;
- i. Defendant's app enables and increases 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 Defendant's app can increase risky and uninhibited behavior in children, making them easier targets to adult predators for sexual exploitation, sextortion, and CSAM;
- l. Usage of Defendant's app 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;

- 1 n. The likelihood and intensity of these harmful effects is exacerbated by the  
2 interaction of each app's features with one another;
- 3 o. Defendant fails to verify ages, allowing adult predators to pose as children on  
4 Defendant's app;
- 5 p. Defendant's failure to verify ages allows children to bypass parental controls,  
6 safety features and default settings; and
- 7 q. Others as set forth herein.

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

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

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

17 233. As a direct and proximate result of Defendant's failure to warn, Plaintiff requires  
18 and/or will require more healthcare and services and did incur medical, health, incidental, and  
19 related expenses.

20 234. The nature of the fraudulent and unlawful acts that created safety concerns for  
21 Plaintiff are not the type of risks that are immediately apparent from using Defendant's app.

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

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

#### **FIFTH CAUSE OF ACTION**

#### **NEGLIGENCE – UNREASONABLE DESIGN**

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

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

238. This claim is brought against Defendant Roblox.

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

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

241. 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 Defendant's own internal data and knowledge regarding its app at the time of the app's development, design, marketing, promotion, advertising, and distribution to Plaintiff.

242. Defendant knew, or by the exercise of reasonable care, should have known, that ordinary minor consumers such as Plaintiff would not have realized the potential risks and dangers of its app. Those risks include grooming, sexual abuse, and sexual exploitation, which can lead to a cascade of negative effects, including but 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.

243. Defendant owed a duty to all reasonably foreseeable users to design a safe app.

244. Defendant owed a heightened duty of care to minor users of its app because children's brains are not fully developed, resulting in a diminished capacity to make responsible



1 decisions regarding contact with strangers online. Children are also more neurologically vulnerable  
2 than adults to abusive contact facilitated by Defendant's app because they have a hard time  
3 distinguishing between patterns of genuine friendship and grooming relationships.

4 245. Plaintiff was a foreseeable user of Defendant's app.

5 246. Defendant knew that minors such as Plaintiff would use its app.

6 247. Defendant breached its duty in designing its app.

7 248. Defendant breached its duty by failing to use reasonable care in the design of its app  
8 by negligently designing the app with features that specifically allow predators to find, groom,  
9 exploit, and abuse children, as described herein.

10 249. Defendant breached its duty by designing an app that was less safe to use than an  
11 ordinary consumer would expect when used in an intended and reasonably foreseeable manner.

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

20 251. Defendant breached its duty by failing to use reasonable care to use cost-effective,  
21 reasonably feasible alternative designs, including changes to the harmful features, and other safety  
22 measures, to minimize the harms described herein, including but not limited to:

- 23 a. Requiring children have parental approval and a parent's email address to sign-  
24 up for an account;
- 25 b. Effective parental controls;
- 26 c. Effective parental notifications, including notifying parents any time a child  
27 messages another user, particularly an adult user, or notifying parents when  
28

1 children interact with accounts that have been blocked by other users or  
2 suspended in the past, among other controls;

3 d. Setting default safety settings to the most protective options, including blocking  
4 direct messaging between child and adult users, or only allowing messaging  
5 between adult users and a child with the parent's explicit permission to message  
6 the adult user;

7 e. Requiring adults to provide a phone number when signing up for an account;

8 f. Pop-up safety notices within chats and games to warn users about inappropriate  
9 behavior;

10 g. Banning IP and MAC addresses of accounts associated with known abusers;

11 h. Controlled chat option;

12 i. Providing a transcript of a child's communications to the parent;

13 j. Implementing reporting protocols to allow users or visitors of Defendant's app  
14 to report CSAM and adult predator accounts specifically without the need to  
15 create or log in to the apps prior to reporting;

16 k. Robust age and identity verification;

17 l. Reasonable age restrictions;

18 m. Separating adults from children by, for example, creating a separate app for  
19 children; and

20 n. Others as set forth herein.

21 252. Alternative designs that would reduce the dangerous features of Defendant's apps  
22 was available, would have served effectively the same purpose as Defendant's defectively designed  
23 app, and would have reduced the gravity and severity of danger Defendant's app posed minor  
24 Plaintiffs.

25 253. A reasonable company under the same or similar circumstances as Defendant would  
26 have designed a safer app.

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

1           255. As a direct and proximate result of Defendant's breached duties, Plaintiff was  
2 harmed. Defendant's design of its app was a substantial factor in causing Plaintiff's harms and  
3 injuries.

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

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

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

14                                   **SIXTH CAUSE OF ACTION**

15                                   **NEGLIGENT UNDERTAKING**

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

17           259. Plaintiff incorporates each and every factual allegation set forth above.

18           260. This claim is brought against Defendant Roblox.

19           261. Defendant rendered parental control services and account safety services to  
20 Plaintiff's mother.

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

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

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

1           265. Defendant could have avoided Plaintiff's injuries with minimal cost, including, for  
2 example, by implementing parental control and account safety services that were effective and that  
3 would prevent child users from being contacted by adult accounts or strangers' accounts generally.

4           266. Imposing a duty on Defendant would benefit the community at large.

5           267. Imposing a duty on Defendant would not be burdensome to them because it has the  
6 technological and financial means to avoid the risks of harm to children.

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

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

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

15           271. Defendant failed to exercise reasonable care in rendering these parental control and  
16 account safety services.

17           272. Defendant's failure to exercise reasonable care increased the risk of, and was a  
18 substantial factor in causing harm to Plaintiff.

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

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

23           275. The nature of the fraudulent and unlawful acts that created safety concerns for  
24 Plaintiff are not the type of risks that are immediately apparent from using Defendant's app.

25           276. The conduct of Defendant, as described above, was intentional, fraudulent, willful,  
26 wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and displayed an  
27 entire want of care and a conscious and depraved indifference to the consequences of their conduct,  
28

1 including to the health, safety, and welfare of its customers, and warrants an award of punitive  
2 damages.

3 277. Plaintiff demands judgment against 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 **SEVENTH CAUSE OF ACTION**

7 **STRICT LIABILITY – DESIGN DEFECT**

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

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

10 279. This claim is brought against Defendant Roblox.

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

14 281. This product was designed, manufactured, maintained, controlled, and distributed  
15 from the California headquarters of Defendant.

16 282. Defendant's product was designed and intended to be a gaming and/or  
17 communication product. The software and architecture of Defendant's product is the same for every  
18 user that logs on or signs up for an account. Defendant's product is uniformly defective and poses  
19 the same danger to each minor user.

20 283. Defendant's product is distributed and sold to the public through retail channels  
21 (e.g., the Apple App "Store" and the Google Play "Store").

22 284. Defendant's product is marketed and advertised to the public for the personal use of  
23 the end-user/consumer.

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

26 286. The defects in the design of Defendant's product existed prior to the release of these  
27 products to Plaintiff and the public, and there was no substantial change to Defendant's product  
28

1 between the time of their upload by Defendant to public or retail channels (*e.g.*, the App Store or  
2 Google Play) and the time of their distribution to Plaintiff via download or URL access.

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

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

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

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

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



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

3 292. The risks inherent in the design of Defendant's product significantly outweigh any  
4 benefits of such design.

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

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

- k. Implementing reporting protocols to allow users or visitors of Defendant's product 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 a separate app for children; and
- o. Others as set forth herein.

294. 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 Defendant's product while reducing the gravity and severity of danger posed by its product's defects.

295. Plaintiff used Defendant's product as intended or in reasonably foreseeable ways.

296. The physical, emotional, and economic injuries of Plaintiff were reasonably foreseeable to Defendant at the time of the product's development, design, advertising, marketing, promotion, and distribution.

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

298. As a manufacturer, designer, and seller, Defendant had a duty to inform itself with the best knowledge of the risks and the defects of its product and Defendant had such knowledge. Its victims, including Plaintiff, were powerless to protect themselves against unknown harms, and Defendant should bear the costs of their injuries.

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



1 that logs on or signs up for an account. These products are uniformly defective and pose the same  
2 danger to each minor user.

3 310. Defendant's product is distributed and sold to the public through retail channels  
4 (*e.g.*, the Apple App "Store" and the Google Play "Store").

5 311. Defendant sold and distributed its product to Plaintiff in a defective and  
6 unreasonably dangerous condition by failing to adequately warn about the risk of harm to youth as  
7 described herein, including a risk of grooming, sexual abuse, and sexual exploitation, which can  
8 lead to a cascade of harms. Those harms include but are not limited to physical injury, damage to  
9 self-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 for young consumers including but not limited to depression, anxiety, suicidal  
12 ideation, self-harm, post-traumatic stress disorder, insomnia, death, and other harmful effects.

13 312. Defendant was in the best position to know the dangers its product posed to  
14 consumers, including Plaintiff, as it had superior knowledge of the risks and dangers posed by its  
15 product and had exclusive knowledge of these risks at the time of development, design, marketing,  
16 promotion, advertising and distribution. Defendant had exclusive control of its product at all times  
17 relevant to this litigation.

18 313. Defendant's product is dangerous, to an extent beyond that contemplated by the  
19 ordinary user who used Defendant's product, because it enables predators to find, groom, abuse,  
20 and exploit children.

21 314. Defendant knew or, by the exercise of reasonable care, should have known that its  
22 product posed risks of harm to youth considering its own internal data and knowledge regarding its  
23 product at the time of development, design, marketing, promotion, advertising, and distribution.

24 315. These risks were known and knowable in light of Defendant's own internal data and  
25 knowledge regarding its product at the time of the product's development, design, marketing,  
26 promotion, advertising, and distribution to Plaintiff.

1           316. Defendant's product is defective and unreasonably dangerous because, among other  
2 reasons described herein, Defendant failed to exercise reasonable care to inform users that, among  
3 other things:

- 4           a. Sexual predators use Defendant's product to find, contact, groom and abuse  
5           children with alarming frequency;
- 6           b. Sexual predators use Defendant's product to solicit, produce, and distribute  
7           CSAM with alarming frequency;
- 8           c. Sexual predators target young children for CSAM on Defendant's product with  
9           alarming frequency;
- 10          d. Sexual predators use Robux to coerce children into sending them nude photos  
11          or engaging in other types of sexually explicit behavior;
- 12          e. Defendant's product is designed in a way that enables and increases risk of  
13          exposure to predators and resulting sexual exploitation;
- 14          f. Defendant's product causes grooming, sexual abuse, and sexual exploitation,  
15          and its resultant physical and mental injuries;
- 16          g. Use of Defendant's product can increase risky and uninhibited behavior in  
17          children, making them easier targets to adult predators for sexual exploitation,  
18          sextortion, and CSAM;
- 19          h. Use of Defendant's product can normalize abuse and pornography, leading  
20          children to abuse other children either contemporaneously or later when the  
21          children are older;
- 22          i. New users of Defendant's product can identify themselves as minors, begin to  
23          use the product, and do so indefinitely, without ever receiving a safety warning,  
24          and without ever having to provide information so that Defendant can warn the  
25          users' parents or guardians;
- 26          j. Defendant's failure to verify ages allows children to bypass parental controls,  
27          safety features and default settings;
- 28          k. The likelihood and severity of harms is greater for children;

- 1 l. The likelihood and intensity of these harmful effects is exacerbated by the
- 2 interaction of each product's features with one another; and
- 3 m. Others as set forth herein.

4 317. Plaintiff was a foreseeable user of Defendant's product.

5 318. Ordinary minor users would not have recognized the potential risks of Defendant's  
6 product when used in a manner reasonably foreseeable to Defendant.

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

10 320. Defendant's failures to adequately warn Plaintiff about the risks of its defective  
11 product were a proximate cause and a substantial factor in the injuries sustained by Plaintiff.

12 321. The nature of the fraudulent and unlawful acts that created safety concerns for  
13 Plaintiff are not the type of risks that are immediately apparent from using Defendant's product.

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

19 323. Plaintiff demands judgment against 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 **VII. PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiff demands judgment against Defendant for the above-referenced  
24 claims and causes of action, and as follows:

- 25 1. Past, present, and future general damages, the exact amount of which has yet to be
- 26 ascertained, in an amount which will confirm to proof at time of trial, to compensate
- 27 Plaintiff for injuries sustained as a result of the use of Defendant's product,
- 28



1 including but not limited to physical pain and suffering, mental anguish, loss of  
2 enjoyment of life, emotional distress, and expenses for medical treatments;

3 2. Past, present, and future economic and special damages, according to proof at the  
4 time of trial;

5 3. Impaired earning capacity according to proof at the time of trial;

6 4. Medical expenses, past and future, according to proof at the time of trial;

7 5. Punitive or exemplary damages according to proof at the time of trial;

8 6. Attorneys' fees;

9 7. For costs of suit incurred herein;

10 8. Pre-judgment and post-judgment interest as provided by law;

11 9. For nonmonetary injunctive relief; and

12 10. For such other and further relief as the Court may deem just and proper.

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14 **VIII. DEMAND FOR A JURY TRIAL**

15 Plaintiff hereby demands a trial by jury on all claims so triable.  
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18 Date: October 2, 2025

Respectfully submitted,

19 **ANAPOL WEISS**

20  
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*\*Pro Hac Vice* motions forthcoming

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