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7 *Attorneys for Plaintiff Jane Doe and Her Next Friend John Doe*

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA**

10 JOHN DOE, as next friend of minor
11 plaintiff, JANE DOE,

12 Plaintiff,

13 v.

14 ROBLOX CORPORATION and
DISCORD INC.,

15 Defendants.

Case No.:

COMPLAINT

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

I. INTRODUCTION

1. This action seeks to hold Roblox and Discord accountable for recklessly and deceptively operating businesses in a way that led to the sexual exploitation and attempted rape of Plaintiff. The heinous acts against Plaintiff were committed by a dangerous child predator whose actions were possible only because of the egregiously tortious conduct of Defendants.

2. Through their pervasive patterns of misrepresentations about safety, Defendants portray their apps as safe and appropriate places for children to play. In reality, and as Defendants well know, the design of their apps makes children easy prey for pedophiles, and Defendants had no appropriate safeguards to ensure that children were in fact safe or that predators were screened. There are steps that Defendants could have taken to protect children and to make their apps safer. But time and again Defendants have refused to invest in basic safety features to protect against exactly the kind of exploitation that Plaintiff suffered.

3. The reason for Defendants’ unlawful conduct is simple: Defendants prioritize growing the number of users of their apps over child safety. As one former Roblox employee explained in describing the company’s approach to child safety, “You have to make a decision, right? You can keep your players safe, but then it would be less of them on the platform. Or you just let them do what they want to do. And then the numbers all look good and investors will be

1 happy.”¹ Discord has taken the same approach to child safety on its app. Defendants’
2 prioritization of growth over the safety of children has devastated the lives of children who use
3 their apps.

4 4. Plaintiff is a 14-year-old girl who was an avid user of Defendants’ apps for several
5 years. She relied heavily on the apps for entertainment and social interaction, making her a prime
6 target for the countless child predators that Defendants knew were freely roaming the app looking
7 for vulnerable children.

8 5. Plaintiff was targeted on Roblox by a predator who posed as a fellow child and
9 exploited Plaintiff’s age and vulnerability to build a false emotional connection with her by
10 promising friendship and connection. After capturing her trust, the predator escalated his
11 grooming of Plaintiff on Roblox and then also on Discord. He sent Plaintiff graphic messages
12 describing sexual acts he intended to do to her and sent her sexually explicit images of himself.

13 6. The predator ultimately convinced Plaintiff to meet him in person. Around January
14 2025, he traveled from another state to Alabama and arranged to meet Plaintiff at a fast-food
15 restaurant near her home. When the predator arrived there, he took Plaintiff to a nearby location
16 and attempted to rape her. Plaintiff resisted, and fortunately, law enforcement arrived during the
17 encounter, finding Plaintiff in a state of extreme distress. She was shirtless, with bruises on her
18 arms and legs. The predator had his genitals exposed and was attempting to forcibly remove
19 Plaintiff’s pants to rape her. Police arrested the predator, who is currently incarcerated.

20 7. Plaintiff suffered this sexual exploitation and abuse as the direct result of
21 Defendants’ conduct. For years, Defendants have misrepresented and deliberately concealed
information about the pervasive predatory conduct that their apps enable and facilitate. Had
Defendants disclosed the truth of what was really occurring on their apps, Plaintiff’s father would

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

1 never have permitted Plaintiff to use these apps without his strict supervision. Had Defendants
2 taken any steps to screen users before allowing them on the apps, Plaintiff would not have been
3 exposed to the large number of predators trolling the platforms. Had Defendants implemented
4 even the most basic system of age and identity verification, as well as effective parental controls,
5 Plaintiff would never have engaged with this predator and never been harmed.

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

12 **II. PARTIES**

13 **A. Plaintiff**

14 9. Minor Plaintiff Jane Doe, and her father and next friend John Doe, are citizens and
15 residents of the State of Alabama, with a principal place of residence in Covington County.

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

21 11. Plaintiff never entered into any contract with Defendants. To the extent
Defendants claim that Plaintiff attempted to accept an electronic terms and conditions clause by
clicking buttons on a screen that included language that Plaintiff did not read or understand, such
an assertion is legally erroneous, invalid, and unenforceable, including because Plaintiff

1 disaffirms any such contract, including any forced arbitration clause and any delegation clause in
2 any contract.

3 **B. Defendants**

4 12. Defendant Roblox Corporation is a Delaware corporation with its principal place
5 of business in San Mateo, California. Roblox owns, operates, controls, produces, designs,
6 maintains, manages, develops, tests, labels, markets, advertises, promotes, supplies, and
7 distributes the Roblox app. Roblox is widely available to consumers throughout the United
8 States.

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

14 **III. JURISDICTION AND VENUE**

15 14. This Court has subject-matter jurisdiction over this action under 28 U.S.C. §
16 1332(a) because Plaintiff and Defendants are citizens of different states and the amount in
17 controversy exceeds \$75,000.

18 15. This Court has personal jurisdiction over Defendants because they maintain their
19 principal places of business within this District.

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

17 17. Divisional Assignment. Assignment to the San Francisco Division or the Oakland
18 Division is proper under Civil L.R. 3-2(c) because Roblox and Discord are headquartered in San
19 Francisco.

1 Mateo and San Francisco, respectively, and a substantial part of the events or omissions giving
2 rise to the claims occurred therein.

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

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

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

10 19. Roblox is easily accessible, including to children. It is free to download and play
11 and is available on gaming consoles, computers, tablets, and cellular devices.

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

19 21. Roblox designed its app for children. Roblox has marketed its app not only as the
20 “#1 gaming site for kids and teens”⁴ but also as an educational experience for young users. Roblox
21 claims that it provides “new gateways into learning”—from “chemistry to physics to robotics and

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

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

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

1 more, Roblox experiences bring concepts to life in ways that immerse learners and motivate
2 exploration, play, and deep thinking.”⁵ These offerings, according to Roblox, include
3 “high-quality, standards-aligned, immersive educational experiences designed by curriculum
4 experts.”⁶



Learners

Roblox is a collaborative and civil place to learn

Why learn on Roblox?

- Active learning: Engaged learners leads to better knowledge absorption and retention.
- Safe and civil: We continually work with parents and digital safety experts to ensure that learners can confidently engage in experiences and develop collaborative digital citizenship skills.
- Expert-backed: Supplement learning with immersive experiences designed by curriculum experts.

Roblox webpage – “A New Era of Engaged Learning”

22. 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.

23. 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.

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

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

⁶ *Id.*

⁷ Qustodio, *Research by App Category – Gaming*,

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

ROBLOX

SIGN UP AND START HAVING FUN!

Birthday

Month

Day

Year


Username


Don't use your real name

Password

At least 8 characters

Gender (optional)





By clicking Sign Up, you are agreeing to the [Terms of Use](#) including the arbitration clause and you are acknowledging the [Privacy Policy](#)

Sign Up

Roblox Sign-up Screen

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

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

<https://www.gustodio.com/en/the-digital-dilemma/gaming/> (last visited Feb. 11, 2025).



Example default avatar on Roblox.

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



Examples of games available on Roblox.

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

30. Now, under Roblox's default settings, adults cannot directly message children

1 under 13, but Roblox still does nothing to prevent children this young from creating accounts with
2 fake 13+ birthdates, which gives them full access to Roblox’s direct-messaging options. Roblox
3 still relies on self-reported birthdates for age verification. Further, children 13 and over are still
4 vulnerable to receiving friend requests—or direct messages within Roblox experiences—from
5 adult strangers. There is also nothing that prohibits adults from entering fake birthdays and posing
6 as children in their attempts to friend or otherwise communicate with children users.

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

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

15 **B. Roblox Lures Parents into Letting Their Kids Use Roblox with Promises of**
16 **Safety.**

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

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

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

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

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

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

19 ¹⁰ Roblox, *Keeping Kids Safe*,
20 [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)
21 [spx](https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents) (archived May 1, 2008); *see also* Roblox, *Information for Parents*,
<https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents> (archived Jan. 31,
2016).

¹¹ *Id.*

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

¹³ *Id.*

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



4
5
6
7
8
9 *Excerpt from Roblox Parent's Guide in 2017*

10 37. Roblox's website representations have remained largely unchanged since then. In
11 2023, for example, Roblox assured parents that it "continually develop[s] cutting-edge
12 technologies to ensure that the Roblox platform remains a safe and fun space for players all over
13 the world."¹⁴ Roblox claimed that the company was "dedicated to working together with parents
14 and digital safety experts to promote a family-friendly environment that allows all players to
15 imagine, create, and play online."¹⁵ Roblox emphasized that it is "committed to ensuring that
16 Roblox is a safe and fun place for everyone."¹⁶ According to Roblox, it "goes above and beyond to
17 foster an environment where people of any age can create, play, learn, and imagine safely. We've
18 kept children's privacy and safety top-of-mind when designing our platform, especially through

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

21 ¹⁵ *Id.*

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

1 the implementation of advanced text filters that block inappropriate language or other unsafe
2 content.”¹⁷

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

7 39. 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.”¹⁹ Roblox touts a
9 “stringent safety system and policies,”²⁰ 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”;
and its chat filters for inappropriate content, which “are even stricter” for children under 13 and
13 “include any potentially identifiable personal information, slang etc.”²¹

14 40. These false promises and assurances are not confined to Roblox’s website. They are
repeated in statements by the company’s highest executives—including in direct response to

15 ¹⁷ Roblox, *Roblox & User Data FAQ*,
<https://en.help.roblox.com/hc/en-us/articles/4406238486676-Roblox-User-Data-FAQ> (last visited
16 Feb. 11, 2025).

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

18 ¹⁹ Roblox, *Safety Features: Chat, Privacy & Filtering*,
<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> (last visited Feb. 11, 2025).

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

²¹ *Id.*

1 concerns raised by parents.

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

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

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

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

Parents

18 ²² Eric Frenchman, *Revisiting Roblox*, Pardon My French (Oct. 5, 2009),
<https://pardonmyfrench.typepad.com/pardonmyfrench/2009/10/revisiting-roblox.html>.

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

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

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

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

14 46. In 2019, while presenting on a "Digital Civility Panel," Bhaumik emphasized that
15 "[w]e make sure there's a safe environment," citing Roblox's "tremendous reporting system" and
16 "incredible moderation and CS team that reacts very, very quickly."²⁸ On that same panel—and in
17 contradiction to Roblox's representation that it had always taken "every precaution possible" to
18 protect children—Bhaumik conceded that "digital civility did not exist at Roblox a year and a half
19 ago."

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

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

²⁷ *Id.*

²⁸ YouTube, Digital Civility Panel (Oct. 23, 2019),
https://www.youtube.com/watch?v=XoUs1Js7WG0&list=PLcKphP00N1_kCLjvcOWdwbegJkNSL-CuL&index=6.

1 ago and we established this and made it a movement within our company.”²⁹ She added later, “It’s
2 still very early days for us. This whole digital civility focus for Roblox is still there, we’re just still
3 establishing it.”³⁰

4 47. In a 2022 video interview about safety on Roblox, Bhaumik asserted that Roblox’s
5 “number one priority” is “to create a safe, civil, and inclusive community” and that “[s]afety and
6 civility has always been baked into everything that we do.”³¹ That year, on a podcast, she also
7 bragged about Roblox’s purported safety protections, including “thousands of human moderators
8 on the front lines” and “machine learning that is constantly taking a look at chat filters.”³² With
9 these and other measures, she exclaimed, “[a]ny sort of bad actor that comes onto the platform is
10 dealt with swiftly” and “[w]e remove any content that’s reported to us within minutes.”³³

11 48. In 2023, Matt Kaufman, formerly the Chief Systems Officer for Roblox, was
12 appointed Chief Safety Officer, at which point he too began peddling Roblox’s child safety
13 narrative.

14 49. In a 2024 blog post on Roblox’s website, Kaufman asserted that “Roblox has spent
15 almost two decades working to make the platform one of the safest online environments for our
16 users, particularly the youngest users. Our guiding vision is to create the safest and most civil
17 community in the world.”³⁴ According to Kaufman, “For users under 13, our filters block sharing
18 of personal information and attempts to take conversations off Roblox, where safety standards and
19

20 ²⁹ *Id.*

21 ³⁰ *Id.*

³¹ 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/>.

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

³³ *Id.*

³⁴ 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>.

1 moderation are less stringent.”³⁵ A few months later, he added, “Safety is and always has been
2 foundational to everything we do at Roblox.”³⁶

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

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

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

7 52. Roblox’s public statements and promises are carefully crafted to paint the picture
8 of a digital playground that is safe and appropriate for children. When parents, the press, or child
9 advocates raise questions and concerns, the company’s highest executives respond with
10 comforting promises of safety.

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

16 _____
17 ³⁵ *Id.*

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

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

21 ³⁸ 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>.

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

2 **54.** Roblox is a vast ecosystem offering an endless array of not just online games but
3 also immersive virtual worlds where children’s customized avatars can engage in activities like
4 playing house, adopting pets, and mimicking adult behaviors, including sexually explicit ones.

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

11 **56.** As early as 2010, Roblox’s virtual games had already devolved into hosting and
12 promoting sexually explicit content. Roblox’s scripting language, which allows developers to
13 manipulate avatar activity and interactions any way they want, was deployed to create scenarios
14 where avatars engaged in simulated sexual activity.³⁹

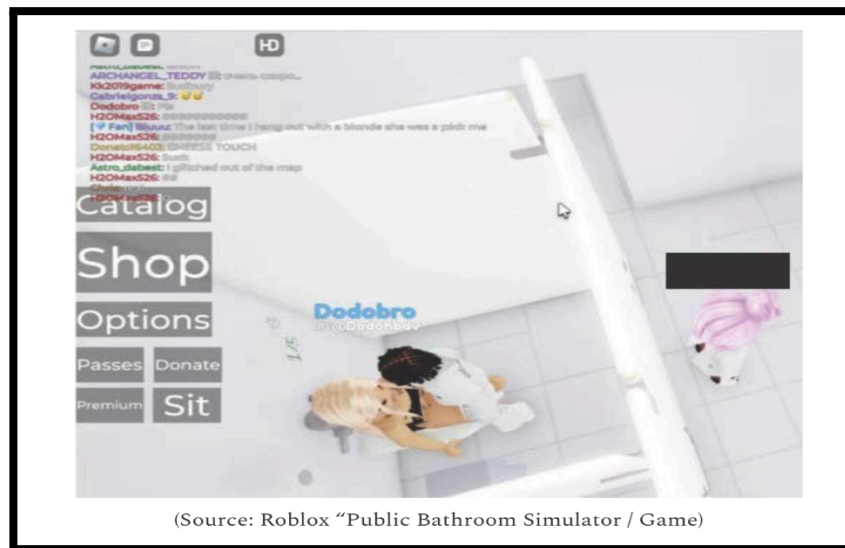
15 **57.** This simulated sexual activity pervades Roblox. There have been numerous reports
16 of children’s avatars being raped by other users’ avatars. For example, in 2018, a seven-year-old
17 girl’s avatar was violently raped by two male avatars *on a playground* in a Roblox experience,
18 which was witnessed by the girl’s mother.⁴⁰ In describing the aftermath of this traumatic
19 experience, the girl’s mother exclaimed, “I never in my wildest dreams would’ve ever imagined
20 that I would have to talk with my seven-year-old about rape.”⁴¹

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

⁴⁰ Savannah Levins, *North Carolina Mom Outraged After Roblox Game Depicts Violent Acts, Including Rape*, WFMYNews2 (June 30, 2018),
[https://www.wfmynews2.com/article/news/local/2-wants-to-know/north-carolina-mom-outraged-a
fter-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).

⁴¹ *Id.*

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



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

59. 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

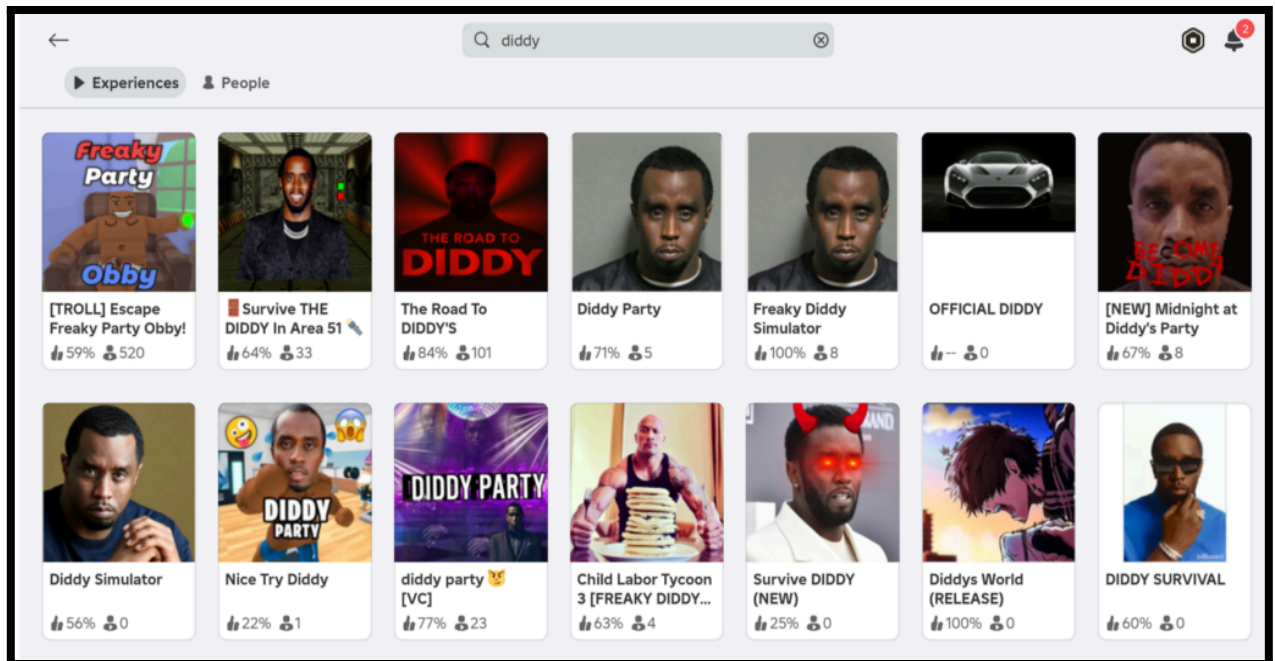
⁴² EJ Dickson, *Inside the Underground Strip-Club Scene on Kid-Friendly Gaming Site Roblox*, Rolling Stone (Sep. 12, 2021), <https://www.rollingstone.com/culture/culture-features/roblox-virtual-strip-clubs-condo-games-sex-1197237/>.

⁴³ Hindenburg, *supra* note 1.

⁴⁴ Dickson, *supra* note 42.

⁴⁵ Hindenburg Research, *supra* note 1.

1 reported incidents involving the music mogul Sean Combs, publicly known as “Diddy.” Diddy
2 was recently indicted and is on trial for sex trafficking of minors and other grievous criminal
3 charges regarding allegations surrounding reports about “freak-off” parties—events which,
4 according to multiple lawsuits and media reports, allegedly involved forced drug use, violent
5 assaults, and the sex trafficking of minors, including victims as young as 10 years old.



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

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

⁴⁶ *Id.*



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

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

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

⁴⁷ *Id.*

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

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

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

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

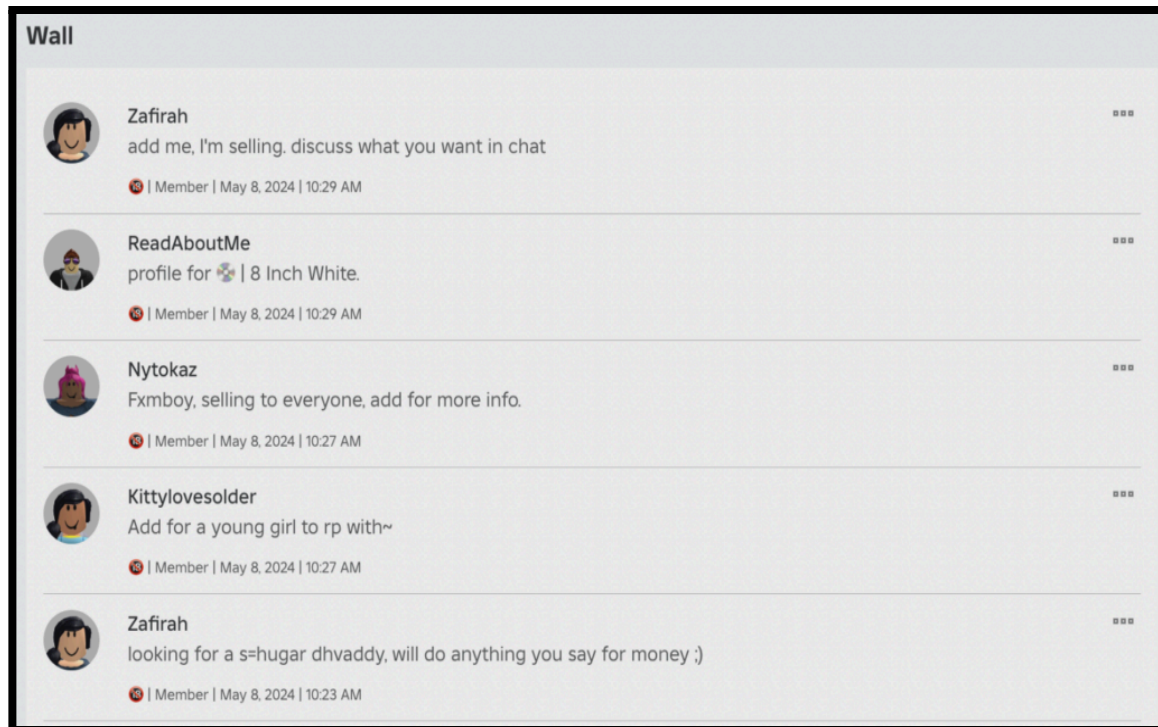
19 ⁴⁹ Jonathan Burnay, Brad J. Bushman & Frank Larøi, *Effects of Sexualized Video Games on Online Sexual Harassment*, 45 *Aggressive Behavior* 2, 214 (March/April 2019).

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

21 ⁵¹ Hindenburg Research, *supra* note 1.

⁵² *Id.*

⁵³ *Id.*




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

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

⁵⁴ *Id.*

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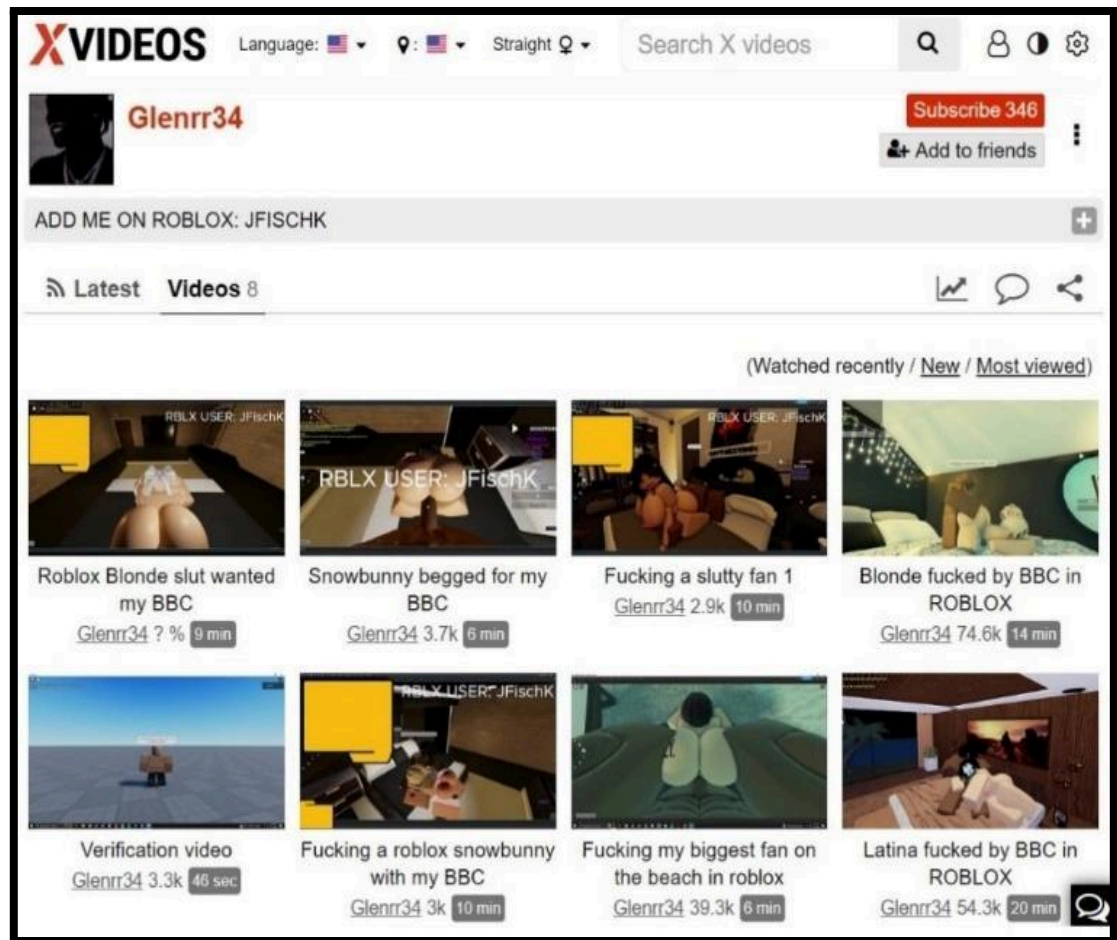
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14 Friends 41 Followers 9 Following

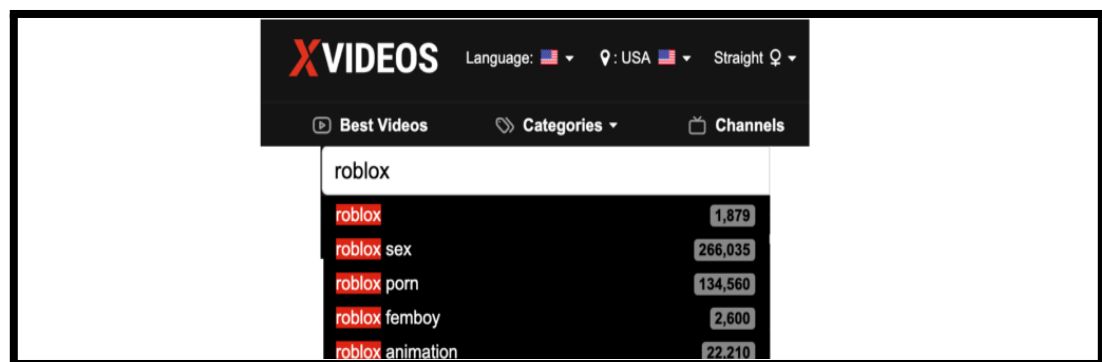
About

About

only adding the best
follow to be added faster
170k views on xv, add to be next
iterate and professional



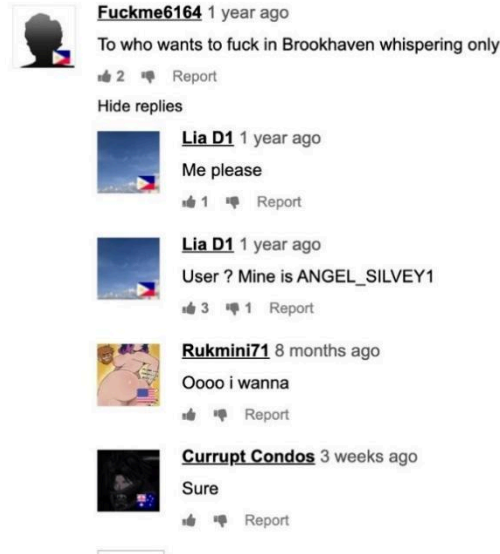
This Roblox user advertised their Roblox account on porn website, XVideos, where they had uploaded videos of their avatar having sex with other Roblox users.⁵⁵



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

⁵⁵ *Id.*

⁵⁶ *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.⁵⁷

67. 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.

68. 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.

69. 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

⁵⁷ *Id.*

1 misrepresents their age to other users on the app, cosplaying as a fellow child, methodically
2 befriends the vulnerable young victim, and then strategically manipulates the child to move the
3 conversation off Roblox to other popular apps, such as Discord or Snapchat.

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

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

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

19 73. Roblox's app and profit-driven virtual currency system enable predators to exploit
20 children, often by trading or extorting Robux in exchange for explicit photos. Predators
21 commonly offer children Robux for these photos or demand Robux to avoid publicly releasing
22 them, directly tying Roblox's profits to the sexual exploitation of children. Roblox's manipulative

⁵⁸ Carville & D'Anastasio, *supra* note 8.

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

1 reward systems and social dynamics, intentionally designed to exploit children's developmental
2 vulnerabilities, create psychological pressures that predators weaponize for extortion.

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

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

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

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

1 78. For example, in 2017, Roblox’s app enabled a predator to target an eight-year-old
2 child and solicit explicit photos, prompting one mother to observe that Roblox had created “the
3 perfect place for pedophiles.”⁶⁰

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

10 80. In 2019, a Florida predator systematically used Roblox to target children ages
11 10-12, moving them to Discord to coerce the children into sending him naked pictures of
12 themselves.⁶³ That year, a man in Wales encouraged 150 children to engage in sexual activity by
13 contacting them through Roblox, where he pretended to be a child and used fake names.⁶⁴

14 81. During the pandemic, reports of child sex abuse facilitated by Roblox accelerated.
15 In 2020, for example, Roblox enabled a 47-year-old predator to pose as a teenager, target a

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

19 ⁶¹ Briana Barker, *Internet Safety and Your Children: How Kids are at Risk*, Record-Courier (Mar.
20 27, 2018),
21 <https://www.record-courier.com/story/news/2018/03/27/internet-safety-your-children-how/12899346007/>.

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

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

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

1 16-year-old girl, move the conversation to Facebook, solicit explicit photos and videos, all of
2 which constituted child pornography,⁶⁵ and ultimately traffic her across state lines, raping her
3 multiple times.⁶⁶ In Michigan, a man was arrested for persuading an eight-year-old girl to send
4 him videos of herself, in various stages of undress, in exchange for Robux.⁶⁷ The perpetrator had
5 been arrested for similar offenses three years earlier and was a registered sex offender in Kansas.
6 This perpetrator was not the only convicted sex offender who was able to freely create accounts
7 on Roblox: in 2021, a convicted sex offender used Roblox to sexually solicit a 12-year-old
8 child.⁶⁸ And in 2022, a 33-year-old man groomed a 13-year-old girl on Roblox, transported her
9 from her home in Kansas to his home in Georgia, and raped her multiple times.⁶⁹

82. 2023 was more of the same. For example, a 30-year-old man was arrested for
soliciting illicit photos from young victims and authorities reported that he had three separate
Roblox accounts.⁷⁰ A 27-year-old man was arrested for kidnapping an 11-year-old girl whom he
met on Roblox.⁷¹ A 23-year-old New Jersey man, who was a prominent Roblox developer with a

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

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

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

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

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

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

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

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

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

12 84. Despite supposed “parental controls” that Roblox implemented in 2024 and 2025,
13 predators continue to enjoy easy access to children on the app, causing devastating harm. For

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

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

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

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

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

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

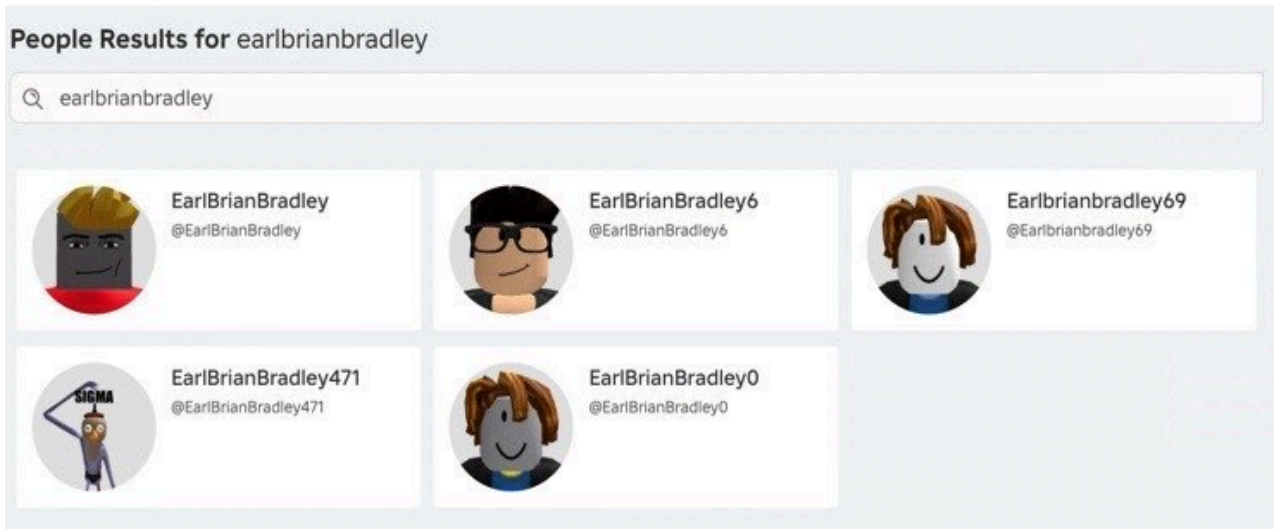
1 example, in April 2025, a California man was arrested and charged with kidnapping and engaging
2 in unlawful sexual conduct with 10-year-old girl whom he met and communicated with on
3 Roblox.⁷⁸ The next month, a 17-year-old Florida teenager was arrested after authorities learned he
4 had been communicating on Roblox with numerous children, some as young as eight-years-old,
5 over the course of a year, and convinced them to send him sexually explicit images of
6 themselves.⁷⁹ And just a few days later, a New York man who used Roblox to connect with 11-
7 and 13-year-old girls was arrested and federally charged with enticement and possession of child
8 pornography.⁸⁰

85. 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
9 usernames like like “@Igruum_minors,” “@RavpeTinyK1dsJE,” and “@EarlBrianBradley”—a
10 reference to one of the most prolific pedophiles ever, who raped and molested hundreds of
11 children.

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

18 ⁷⁹ 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-convinced-kids-to-send-him-sex-abuse-material-on-roblox-sheriff/3605691/>.

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



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

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

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

88. 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

⁸¹ Hindenburg Research, *supra* note 1.

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

⁸³ *Id.*

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

1 perpetrators. Indeed, researchers have repeatedly confirmed this victim-victimizer pipeline: when
2 children are exposed to and victimized by sexual content, they are more likely to become
3 desensitized teenagers and adults who then exploit younger users in the same ways.⁸⁵ In effect,
4 Roblox contributes to this “raising of” predators who perpetuate the cycle of exploitation.

5 89. The magnitude of the harm caused by Roblox is devastating. Yet rather than warn
6 parents, schools and the public, Roblox minimizes these dangers through repeated misleading
7 public statements. Roblox’s Chief Safety Officer, Matt Kaufman, attempting to deflect attention
8 from serious safety failures, told NPR, “I think we’re losing sight of the tens of millions of people
9 where Roblox is an incredibly enriching part of their life.”⁸⁶ And while Kaufman publicly claims
10 that “any time anything happens to a child that puts them at risk is one too many,”⁸⁷ Roblox
11 simultaneously admitted to investors that it was “unable to prevent all such [inappropriate]
12 interactions from taking place.”⁸⁸ This calculated contradiction between public messaging and
13 private admissions—telling parents that even one incident is unacceptable while simultaneously
14 acknowledging to investors that abuse is inevitable—exposes Roblox’s strategy of prioritizing
15 public relations through hollow and misleading public statements over its fundamental duty to
16 protect children.

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

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

⁸⁷ *Id.*

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

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

2 90. 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
5 taken and decisions it has made to increase and monetize users regardless of the consequences.

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

7 86. 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,
9 positioning itself as a place where kids can learn and play games in a safe environment.
10 Recognizing that children have more free time, underdeveloped cognitive functioning, and
11 diminished impulse control, Roblox has exploited their vulnerability to lure them to its app.

12 87. 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
14 enormous pressure on the company to prioritize growing and monetizing its users. To do so,
15 Roblox made deliberate decisions that placed children at risk. For example, while other digital
16 platforms (including other video game platforms) verified users' ages and restricted
17 communications between children and adults, Roblox did not require age verification and did not
18 restrict communications between children and adults. Similarly, while other digital platforms
19 required children's accounts to be connected to the account of a parent or guardian during set-up,
20 with various parental controls turned on by default, it is easy for children (including very young
21 children) to download and install Roblox without involving an adult. While other platforms
22 implemented reliable, accurate age ratings for games and videos that correctly informed parents
23 about the type of content their children would see, Roblox's deeply flawed "content label" system
24 gave parents a false sense of security, incorrectly labeling graphic sexual and violent games as

1 safe for kids. And while other platforms restricted access if a child fell below a certain age,
2 Roblox welcomed and encouraged children of any age, despite its knowledge of significant harms
3 that children routinely experience there.

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

11 89. In pursuit of growth, Roblox deprioritized safety measures even further so that it
12 could report strong numbers to Wall Street. For instance, Roblox executives rejected employee
13 proposals for parental approval requirements that would protect children on the platform.⁹⁰
14 Employees also reported feeling explicit pressure to avoid any changes that could reduce
15 platform engagement, even when those changes would protect children from predators.⁹¹

16 90. As one former Roblox employee explained, “You’re supposed to make sure that
17 your users are safe but then the downside is that, if you’re limiting users’ engagement, it’s hurting
18 our metrics. It’s hurting the active users, the time spent on the platform, and in a lot of cases, the

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

⁹⁰ Hindenburg Research, *supra* note 1.

⁹¹ *Id.*

1 leadership doesn't want that."⁹² That same employee added, "You have to make a decision, right?
2 You can keep your players safe, but then it would be less of them on the platform. Or you just let
3 them do what they want to do. And then the numbers all look good and investors will be
4 happy."⁹³

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

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

16 93. For example, on Roblox's 2023 fourth quarter earnings call, an analyst praised the
17 "really high level of efficiency" seen in the numbers for infrastructure and trust and safety
18 expenditures and then asked how those figures would evolve over time.⁹⁶ In response, Mike
19 Guthrie, Roblox's CFO, emphasized the company's goal of reducing expenses, stating, "cost to
20 serve is the metric that we use and it's the metric that the [infrastructure] team owns . . . they're

21 ⁹² *Id.*

⁹³ *Id.*

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

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

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

1 *working hard to drive that down* [L]ike you said, it’s about 11% now, ultimately with higher
2 efficiency . . . we see that as a high-single-digit number over the next few years.”⁹⁷ He added,
3 “[W]e still think there’s more to do there.”⁹⁸

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

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

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

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

21 ⁹⁷ *Id.* (emphasis added).

⁹⁸ *Id.*

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

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

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

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

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

1 far more lucrative—an outcome that Roblox said it predicted when it started to target older
2 users.¹⁰⁴

3 98. Roblox’s executives repeatedly emphasized their strategy of “aging up” the app to
4 attract older users. At the company’s inaugural conference with an investment bank in September
5 2021, Roblox’s CFO, Michael Guthrie, noted that Roblox had achieved “very good penetration of
6 nine to twelve year-olds,” and was focused on adding users over the age of 13.¹⁰⁵ One plan was to
7 “improve the search algorithms such that older users were finding older content,” or content
8 tailored to their age-related demographic.¹⁰⁶

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

15 100. Roblox executives consistently highlighted progress with the company’s “aging
16 up” strategy on every quarterly earnings call after this until the second quarter of 2023, when
17 CEO Baszucki declared that Roblox had achieved its goal: “We’re no longer talking about aging
18 up. We are a platform for all ages.”¹⁰⁸ He also revealed that developers had started to “build
19 specific 17-plus experiences.”¹⁰⁹ This progress was praised by Wall Street investment banks, who
20

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

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

¹⁰⁶ *Id.*

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

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

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

1 noted that aged-up experiences were a promising indicator of “potential sustainable growth
2 tailwinds for Roblox,” reinforcing the company’s pivot toward maximizing profitability.¹¹⁰

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

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

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

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

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

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

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

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

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

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

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

14 106. Roblox designed its app so that anyone can easily communicate with children,
15 creating a virtual world where predators can freely target and groom children. Until November
16 2024, adult strangers could “friend” and chat with children of any age via direct messages and
17 chat with them in an experience through direct messages even if they were not friends. While
18 Roblox offered some adjustable parental controls for users under the age of 13, these children
19 could bypass those controls simply by creating an alternate account falsely identifying as a
20 13+-year-old user. By designing its app this way, Roblox stripped parents of basic protective
21 options to prevent adult strangers from communicating with their children.

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

1 107. This practice contrasts sharply with other gaming products like Nintendo, which
2 use preprogrammed dialogue options to tightly control user interactions.¹¹⁶ 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
information or send any coercive or sexually suggestive messages.

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

10 109. As Roblox contemplated and rolled out Roblox Connect, it knew that this feature
11 would drastically increase the risk to children on its app. That is because another company had
12 implemented a similar feature with disastrous consequences. Omegle was a chat website that
13 operated from 2009 to 2023. Omegle allowed users, including children, to engage in anonymous
14 chats with strangers. In March 2010, Omegle introduced a video-chat feature. Despite efforts to
15 monitor for mature and sexual content, the website became infamous for exposing minors to
16 explicit material, predators, and exploitation. Omegle’s failure to protect users led to numerous
17 incidents, including criminal cases involving child pornography. In November 2023, the same
18 month Roblox launched Roblox Connect, Omegle announced that it would cease operations. In
shutting down, its founder highlighted the site’s misuse: “[T]here can be no honest accounting of

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

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

1 Omegle without acknowledging that some people misused it, including to commit unspeakably
2 heinous crimes.”¹¹⁸ And he thanked one survivor for “opening my eyes to the human cost of
3 Omegle.”¹¹⁹ Nevertheless, Roblox introduced voice calls the same month that Omegle shut down.

4 110. Roblox also refused to implement simple measures that would have protected
5 children using its app. For example, despite having the ability to require basic identity
6 verification, Roblox instead chose to allow users to create accounts without providing their name
7 or email address—a policy that enables predators to easily create multiple anonymous accounts.
8 Roblox also could have implemented basic screening measures before allowing users on the app,
9 which would have ensured that known predators are not permitted on the app.

10 111. Roblox also could have required children to provide their names and email
11 addresses and obtain parental approval—a fundamental protection against predators—but refused
12 to do so. This decision allowed the company to bypass certain protections that are mandated by
13 federal law and designed to protect children. The Children’s Online Privacy Protection Act
14 (“COPPA”) prohibits companies like Roblox from collecting, using, or disclosing the personal
15 information of children under 13 without verifiable parental consent. COPPA was enacted
16 because Congress recognized the heightened vulnerability of children on the internet. As the
17 Federal Trade Commission (“FTC”) noted, children under 13 lack the capacity to “understand
18 fully the potential serious safety and privacy implications” of sharing their personal
19 information.¹²⁰ More recent international regulations are stricter. For example, the European
20 Union’s General Data Protection Regulation (GDPR) requires verifiable parental consent for
21 children under 16.¹²¹

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

¹¹⁹ *Id.*

¹²⁰ Federal Trade Commission, *Privacy Online: A Report to Congress* (1998),
<https://www.ftc.gov/sites/default/files/documents/reports/privacy-online-report-congress/priv-23a.pdf>.

¹²¹ Art. 8 GDPR; *see also* Consent to Use Data on Children, EU Agency for Fundamental Rights

1 112. The FTC has outlined clear and acceptable methods for obtaining verifiable
2 parental consent. These include: (a) providing a form for parents to sign and return; (b) requiring
3 the use of a credit card or online payment that notifies parents of each transaction; (c) connecting
4 parents to trained personnel via video conference; (d) offering a staffed toll-free number for
5 parental verification; (e) asking knowledge-based questions to confirm identity; or (f) verifying a
parent's photo-ID by comparing it to a second photo using facial recognition technology.¹²²

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

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

14 115. Additionally, although Roblox knew that predators routinely operate dozens of
15 Roblox accounts at the same time, the company chose not to implement basic blocking of digital
16 identifiers—both the unique network addresses that track internet connections (Internet Protocol
17 <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 or 15 if they choose.

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

19 ¹²³ Hindenburg Research, *supra* note 1.

20 ¹²⁴ 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>.

21 ¹²⁵ Carville & D'Anastasio, *supra* note 8.

1 or IP addresses) and the permanent hardware identification numbers assigned to devices (Media
2 Access Control or MAC addresses) that could prevent predators from creating multiple
3 accounts.¹²⁶

4 116. Similarly, Roblox chose not to require adult users to verify phone
5 numbers—which would create significant barriers to predators creating multiple
6 accounts—despite knowing that this enables bad actors to easily create numerous anonymous
7 accounts to target children.¹²⁷

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

14 118. Roblox could easily have restricted communications between adult accounts and
15 children's accounts, something that many other platforms have done. It could also have restricted
16 adult accounts from sending Robux to children's accounts, a feature that sexual predators
17 frequently use to lure children.

18 119. Roblox likewise could have created a separate, gated platform for younger
19 children that excludes adults. If supported by age verification using facial recognition (a service
20 that is widely commercially available), the company could create a space for young children to
21 enjoy Roblox games with very few, if any, adults present. Many digital service companies have

¹²⁶ *Id.*

¹²⁷

¹²⁸ Carl Stroud, *Horrorified Dad Found Sick Messages from Paedo Predator in His Eight-Year Old Son's Roblox iPad Game*, The Sun (Feb. 15, 2017),
<https://www.thesun.co.uk/news/2872376/horrorified-dad-found-sick-messages-from-paedo-predator-in-his-eight-year-old-sons-roblox-ipad-game/>.

1 adopted separate platforms for children of young ages, including, for example, Amazon and
2 Netflix.

3 120. Roblox could have placed a higher age rating on its application in the iOS App
4 Store and other app stores, to signal to parents that the app presented risks for children. Roblox
5 also could have provided clear warnings to parents about the presence of sexual predators on the
6 platform, so that parents could make an informed decision about allowing their child on the
7 platform and/or educate their child on how to stay safe on the platform. Roblox could also have
8 provided clear warnings to children about the presence of sexual predators on the platform, and
9 instructed children on how to stay safe on the platform.

10 121. Despite these glaring failures, Roblox aggressively markets and promotes itself as
11 an “industry leader” when it comes to child safety.¹²⁹ Central to this self-serving narrative is its
12 “accomplishments” of investing in artificial intelligence (“AI”) and machine learning systems
13 supposedly designed to scan and monitor all communications on the app and prevent the sharing
14 of inappropriate content and personally identifiable information.¹³⁰

15 122. Yet this technology has proven grossly inadequate and insufficient to protect
16 children. For example, Roblox’s filters have inexplicable omissions. While Roblox blocks certain
17 words, like “Snap” and “Snapchat,” to supposedly prevent off-app communications, it allows
18 workarounds such as the use of the ghost emoji (👻), which is widely recognized as a symbol for
19 Snapchat, or alternative spellings, like “Snappy” or “apchat.” Similarly, while the word “Discord”
20 is blocked, users can bypass this filter by using the disc emoji (🎮) or typing variations, like
21 “iscord” or “cord.”¹³¹ That Roblox selectively blocks the words “Snap,” “Snapchat,” and

¹²⁹ Q1 2021 Earnings Call (May 11, 2021).

¹³⁰ Roblox, *Safety Features: Chat, Privacy & Filtering*,
https://web.archive.org/web/20240714130904/https://en.help.roblox.com/hc/en-us/articles/203313
120-Safety-Features-Chat-Privacy-Filtering (archived Jul. 14, 2024).

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

1 “Discord” reveals that Roblox is fully aware of the dangers of off-app inappropriate
2 communications yet chooses not to close these loopholes. And while Roblox prevents users from
3 sharing phone numbers in numerical format, it does nothing to stop users from spelling out the
4 numbers.¹³²

5 123. Similarly, while Roblox attempts to block the word “condo”—a term that, until
6 recently, was widely used to identify sexualized experiences—countless external groups on
7 platforms like Reddit and Discord are dedicated to helping users locate new explicit content on
8 Roblox. As soon as Roblox removes one game, its ineffective safeguards allow the same game to
9 be reuploaded almost immediately from a new account, perpetuating the cycle of explicit and
10 harmful content. External groups have capitalized on Roblox’s weak moderation by guiding
11 predators to these reuploaded games, with Fast Company easily identifying 150 Discord groups
12 dedicated to exploiting Roblox’s lack of robust enforcement.¹³³

13 124. Beyond Roblox’s ineffective technology, the company also employs a woefully
14 inadequate number of human moderators to analyze and manage content on its platform. With
15 only about 3,000 moderators, Roblox pales in comparison to platforms like TikTok, which,
16 despite having only three times the number of users, employs more than ten times the number of
17 moderators at 40,000.¹³⁴ Roblox attempts to justify this disparity by claiming “[y]ou really can’t
18 judge the quality of these moderation systems by the number of people.”¹³⁵ But the reality tells a
19 different story. Roblox’s moderators, many of them overseas contractors, report being

17 ¹³² *Id.*

18 ¹³³ Burt Helm, Sex, Lies and Video Games: *Inside Roblox’s War on Porn*, Fast Company (Aug. 19, 2020),
19 <https://www.fastcompany.com/90539906/sex-lies-and-video-games-inside-roblox-war-on-porn>.

20 ¹³⁴ Carville & D’Anastasio, *supra* note 8.

21 ¹³⁵ 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>.

1 overwhelmed by an unmanageable volume of child safety reports, making it impossible to
2 address all concerns effectively and leaving countless safety issues unresolved.¹³⁶

3 125. Even the safety data that Roblox touts is flawed and only underscores the growing
4 dangers created by the company's app. For example, Roblox proudly points to its low percentage
5 of reports to the National Center for Missing and Exploited Children ("NCMEC")—the leading
6 U.S. nonprofit organization tasked with preventing child exploitation and assisting in the
7 recovery of missing children. Roblox claims that it accounts for less than .04% of reports made to
8 NCMEC.¹³⁷ But this data is entirely self-reported and therefore depends on Roblox's ineffective
9 content moderation and safety team. This self-reported data to NCMEC—flawed and limited as it
10 is—also reveals a disturbing trend: Roblox's reports about suspected child sexual exploitation
11 have surged over the years, from 675 reports in 2019 to 13,316 reports in 2023.¹³⁸

12 126. Roblox also boasts that just "0.0063% of [its] total content was flagged for
13 violating" policies. But Roblox itself controls the systems responsible for identifying and
14 flagging violative content.¹³⁹ These lower percentages are thus a reflection not of safety but of
15 Roblox's ability to minimize the appearance of problems through its own inadequate reporting
16 and enforcement mechanisms. By hiding behind self-serving metrics and refusing to take

17 ¹³⁶ Carville & D'Anastasio, *supra* note 8.

18 ¹³⁷ Scott Tong & James Perkins Mastromarino, *Roblox Attempts to Bar Child Predators as Short Sellers Target the Popular Game Platform*, WBUR (Oct. 21, 2024),
19 <https://www.wbur.org/hereandnow/2024/10/21/roblox-child-predators-safety>.

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

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

1 meaningful action, Roblox has fostered an environment where children are subjected to
2 irreparable harm while the company continues to reap financial rewards.

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

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

- 18 a. “Unfortunately, it is worse now due to Roblox’s moderation being so abysmal and
19 Roblox being a far more widespread platform. Creeps flock aplenty when before
20 the creep: kid ratio was much much lower Roblox has no interest in actually
21 fixing the issues so long as the bad press doesn’t end up viral.”¹⁴¹

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

¹⁴¹ *Id.*

- 1 b. “No. Roblox is not safe for children. The amount of NSFW [Not Safe for Work] I
2 see on this platform on a daily basis is unbelievable. I’m surprised COPPA hasn’t
3 taken any action.”¹⁴²
- 4 c. “I believe they need to automatically rate these games for older audiences, if not,
5 you know, removing them entirely. I could keep going on about this issue, but it’s
6 just beating a dead horse at this point.”¹⁴³
- 7 d. “Roblox got banned for bad moderation; Turkey banned it to ‘protect children,’
8 and they are not wrong. The amount of visits from 10 of these games is, in
9 summary, 100 million+. I don’t want to know how many of these children have
10 seen nudity or even developed a p*rn addiction. But that is a big problem with
11 Roblox doing almost nothing to prevent it.”¹⁴⁴

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

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

17 92. After years of mounting pressure, Roblox recently announced changes to its child
18 safety features. These changes were prompted not by the years of police reports and widespread
19 media coverage but by a scathing report published by a well-known short seller accusing the
20 platform of being a “pedophile hellscape for kids.”¹⁴⁵ Released on October 8, 2024, the report
21 sparked public outrage, detailing many of the issues described above that Roblox had long
ignored.

¹⁴² *Id.*

¹⁴³ *Id.*

¹⁴⁴ *Id.*

¹⁴⁵ Hindenburg Research, *supra* note 1.

1 93. A little more than a month later, Roblox announced a series of changes, including
2 permanently removing the ability to message others outside of games on its app for under
3 13-year-old users;¹⁴⁶ giving parents a separate dashboard where they can monitor a child's Roblox
4 account, view the child's friend list, set spending control, and manage screen time;¹⁴⁷ preventing
5 games from using chalkboard writings where people could get around the censoring of
6 communications;¹⁴⁸ and implementing restrictions to stop under 13-year-old users from accessing
new Roblox games that are awaiting maturity ratings.¹⁴⁹

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

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

14 96. Roblox also failed to address core issues like the app's lack of age verification and
15 refusal to require parental consent to make an account. The restrictions described above work
16 only if children correctly state their age during sign-up. Any child can easily bypass

17 ¹⁴⁶ *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/>.

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

20 ¹⁴⁸ *Id.*

¹⁴⁹ *Id.*

1 them—including parental controls and limits on messaging—by lying about their birthday.
2 Roblox likewise did not commit to hiring more moderators or increasing its trust and safety
3 budget, nor did it implement any sort of identity check to prevent registered sex offenders from
4 making accounts.

5 97. In fact, recently, in April 2025, a research firm in the U.K. demonstrated just how
6 easy it still is for predators to find children and move the conversation to another application,
7 such as Snapchat or Discord, despite Roblox’s ban on direct messaging with users under the age
8 of 13.¹⁵⁰ Because Roblox still allows adult users to message children *in games*, predators can use
9 the public chat functions in games to groom child users and ask for their usernames on other
10 platforms. And, for chat within games, Roblox’s default settings for children under the age of 13
11 is to allow “everyone” to chat with these children, seamlessly facilitating predators’ access to
12 children.¹⁵¹ The key findings from this report included that “[a]dults and children can chat with no
13 obvious supervision” and that “[t]he safety controls that exist are limited in their effectiveness
14 and there are still significant risks for children on the platform.”¹⁵²
15
16
17

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

20 ¹⁵¹ Parental Controls Overview, Roblox,
<https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview> (last
21 accessed May 10, 2025).

¹⁵² 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.¹⁵³

98. 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.¹⁵⁴ 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.¹⁵⁵

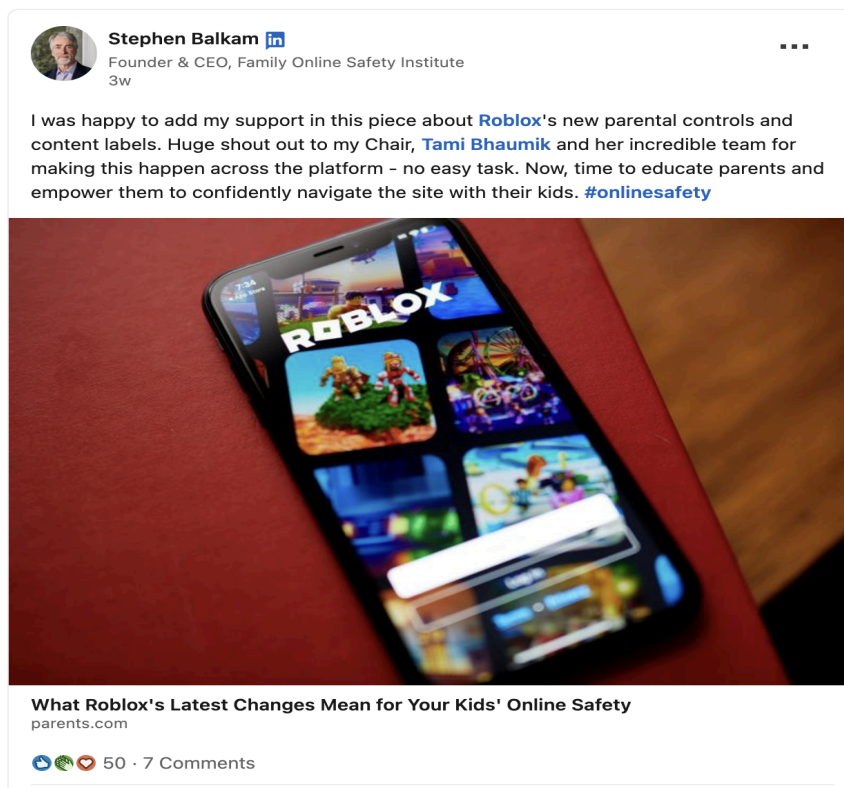
99. Roblox has also engaged in a deceptive public relations campaign using ostensibly independent online safety organizations to influence the narrative around these changes. For instance, Roblox has leveraged its ties to groups like the Family Online Safety Institute (“FOSI”). An online parenting magazine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

¹⁵³ *Id.*

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

¹⁵⁵ *Id.*

1 Roblox's new features as a win for child safety.¹⁵⁶ 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.¹⁵⁷ 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.



14 *Stephen Balkam's LinkedIn post revealing his connection to Roblox in a post*
15 *praising Roblox's changes.*¹⁵⁸

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

18 ¹⁵⁶ 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>.

19 ¹⁵⁷ *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>.

20 ¹⁵⁸ LinkedIn, Stephen Balkam's Post, https://www.linkedin.com/posts/stephenbalkam_what-robloxs-latest-changes-mean-for-your-activity-7264409332950220801-WCDF (last visited Jan. 6, 2025).

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.¹⁵⁹

3 101. 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
5 children. Without allowing parents to see who their child is messaging and what the messages
6 say, parents lack the information necessary to determine which accounts to block on their child's
7 friend list. A list of the top twenty games that a child plays does not tell a parent which games
8 children are interacting with adults in. Moreover, blocking specific games is ineffective when, as
9 discussed above, inappropriate games are re-posted as soon as they are taken down. Indeed,
10 barely a week later, the U.K. research firm discussed above demonstrated just how easy it is for
11 adults to continue to find children, groom them, and then move the communications off Roblox,
12 even after Roblox announced these safety updates.¹⁶⁰

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

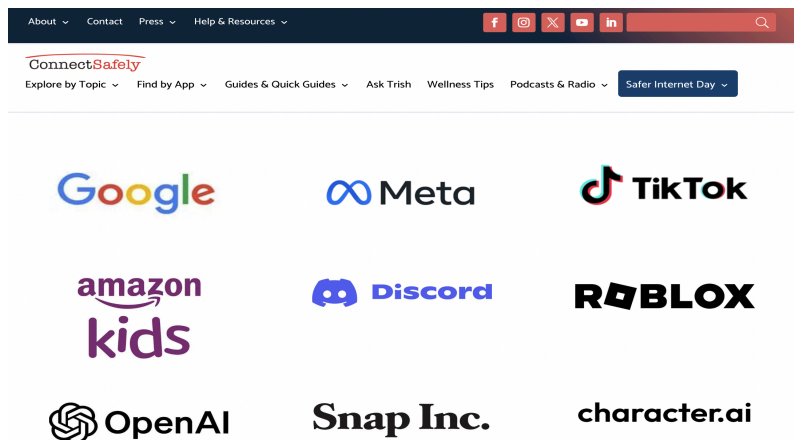
15 103. Roblox's deceptive playbook would not be complete without a misleading public
16 relations campaign, where industry-funded safety "experts" praise Roblox's safety update. For
17 example, Roblox's press release announcing these updates quotes Larry Magid, the CEO of
18 ConnectSafely, as saying, "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."¹⁶¹ What the press

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

¹⁶⁰ *A Digital Playground: The Real Guide to Roblox*.

¹⁶¹ Matt Kaufman, *New Tools for Parents to Personalize Their Child's Experience on Roblox*.

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



8 *ConnectSafely's list of supporters on its website.*

9
10 104. A few weeks later, Magid was quoted again in praise of Roblox, this time in a
11 *Newsweek* article championing Roblox as a “trusted playground” for kids: “I would put them very
12 high up on the list of companies that seem to care. They actually have a vice president of civility.
13 It’s unheard of to have somebody at that level of the company that focuses on civility. They really
14 work very hard to make it a friendly, comfortable, civil environment for young people.”¹⁶³ Again,
15 this article made no mention of Magid’s organization’s financial ties to Roblox.

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

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

21 ¹⁶³ 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>.

¹⁶⁴ *Id.*

1 **V. FACTUAL ALLEGATIONS AS TO DISCORD**

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

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

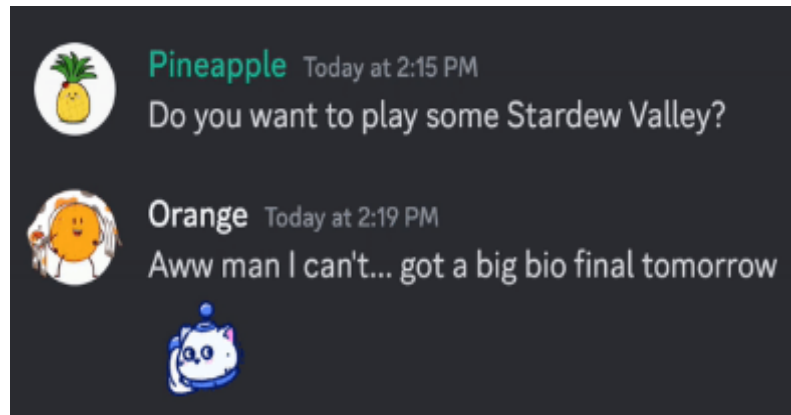
10 107. Launched in 2015, Discord quickly became the top app for gamers looking to
11 communicate while playing videogames. The company’s founders shared a love of video games
12 and created a service for gamers to seamlessly communicate with each other. Discord has since
13 expanded to include a wider audience of anyone looking to communicate with others about an
14 endless array of topics. As Discord puts it, “Discord is now where the world talks, hangs out, and
15 builds relationships”—“Discord lets anyone create a space to find belonging.”¹⁶⁵

16 108. Although many users on Discord are adults, Discord directly markets its app to
17 young users. For example, Discord advertises its functionality for school clubs and offers
18 “Student Hubs,” which are “dedicated places for students on Discord that make it easy to meet
19 classmates from your own school, discover their communities on Discord, and share your servers
20 for your fellow classmates to join.”¹⁶⁶ Discord also markets to young users with features such as
21 “custom emoji, stickers, soundboard effects and more to add your personality to your voice, video

19 ¹⁶⁵ Discord, *Create Space for Everyone to Find Belonging*, <https://discord.com/company> (last
20 visited Feb. 11, 2025).

21 ¹⁶⁶ Discord, *Discover Your Next Favorite Campus Club in Student Hubs* (Aug. 22, 2022),
<https://discord.com/blog/discover-your-next-favorite-campus-club-in-student-hubs>.

1 or text chat.”¹⁶⁷ According to Discord, these features are designed to “make your group chats
2 more fun.”¹⁶⁸



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8 *Example of a custom emoji from Discord's website.*¹⁶⁹

9 109. In recent years, Discord has exploded in popularity among young users, driven in
10 part by the pandemic. As The New York Times explained in its article *How Discord, Born from*
11 *an Obscure Game, Became a Social Hub for Young People*, “While adults working from home
12 flocked to Zoom, their children were downloading Discord to socialize with other young people
13 through text and audio and video calls in groups known as servers.”¹⁷⁰ Given this influx of young
14 people, which has only grown since the pandemic, the average age of a Discord user is 16 years
15 old.¹⁷¹

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

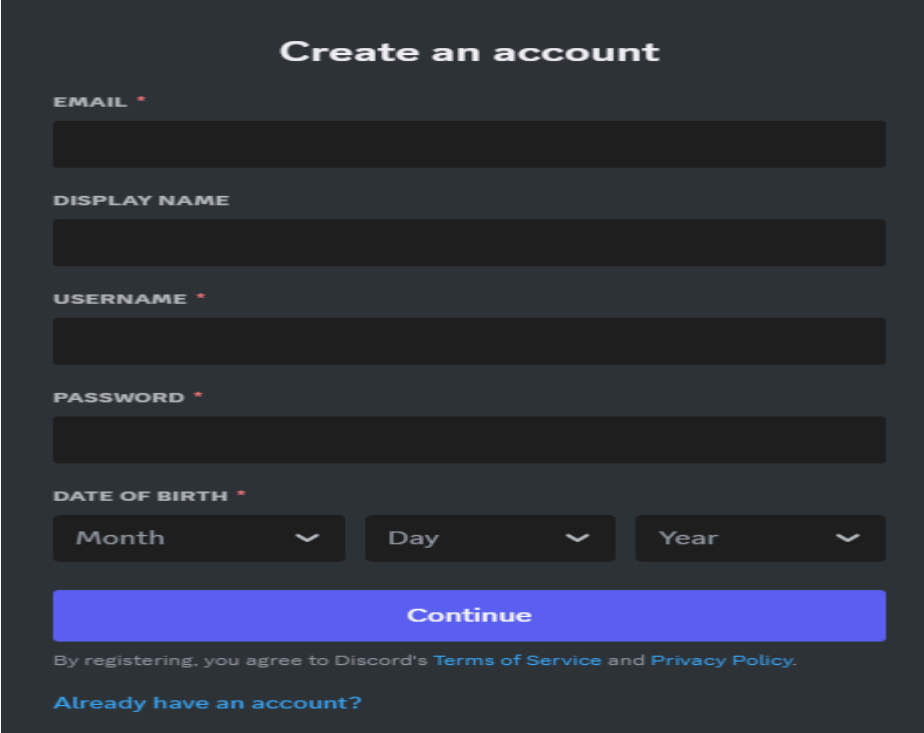
17 ¹⁶⁸ *Id.*

18 ¹⁶⁹ Discord, *Custom Emojis*,
[https://support.discord.com/hc/en-us/articles/360036479811-Custom-Emojis#h_01H06JVDAV2V](https://support.discord.com/hc/en-us/articles/360036479811-Custom-Emojis#h_01H06JVDAV2VKZBTRGJDY8NBV7)
[KZBTRGJDY8NBV7](https://support.discord.com/hc/en-us/articles/360036479811-Custom-Emojis#h_01H06JVDAV2VKZBTRGJDY8NBV7) (last visited Feb. 11, 2025).

19 ¹⁷⁰ Kellen Browning, *How Discord, Born from an Obscure Game, Became a Social Hub for Young*
People, N.Y. Times (Dec. 29, 2021),
<https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

20 ¹⁷¹ Super League, *An Introductory Look into Discord*,
<https://www.superleague.com/post/an-introductory-look-into-discord>.

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



Create an account

EMAIL *

DISPLAY NAME

USERNAME *

PASSWORD *

DATE OF BIRTH *

Month Day Year

Continue

By registering, you agree to Discord's [Terms of Service](#) and [Privacy Policy](#).

[Already have an account?](#)

Discord Sign-up Screen

111. While Discord's Terms of Service prohibit users under 13, Discord does not verify age or identity. As a result, countless Discord users are under 13, many of whom state their real age in their bios, tell other users their real age in chats, and post pictures showing their real age. There are children as young as eight years old using Discord.¹⁷²

112. Although Discord offers certain safety features, Discord does not default to the highest safety settings upon account creation. For example, by default, all users, including those under 18, can receive direct messages from another user in the same server, allowing them to

¹⁷² Kellen Browning, *5 Ways Young People Are Using Discord*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-users-gen-z.html>.

1 send and receive private messages from strangers. And even when parents set more restrictive
2 settings, children can simply change those settings to whatever they desire.

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

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

11 114. Since its inception, Discord has assured parents that its app provides a safe place
12 for children to spend their time interacting with others. According to Discord, “in May 2015,
13 Discord began as a way for us to all play games together, better. And Safer.”¹⁷³ “We’ve always
14 wanted Discord to be a place where one could safely play games with friends.”¹⁷⁴

15 115. For years, Discord has promised that it has a “zero-tolerance policy” for anything
16 relating to the sexual exploitation of children. For example, in Discord’s July – September 2022
17 Transparency Report, Discord emphasized that it “has a zero-tolerance policy for anyone who
18 endangers or sexualizes children.”¹⁷⁵ Similarly, in a July 2023 website post titled “Discord’s
19 Commitment to Teen and Child Safety,” Discord assured parents that it “has a zero-tolerance
20 policy for inappropriate sexual conduct with children and grooming,” with “special attention
21 given to predatory behaviors such as online enticement and the sexual extortion of children.”¹⁷⁶

¹⁷³ Discord, *Discord Safety Boost* (Mar. 28, 2017), <https://discord.com/blog/discord-safety-boost>.

¹⁷⁴ *Id.*

¹⁷⁵ Discord, *Discord Transparency Report: July – September 2022*,
<https://discord.com/blog/discord-transparency-report-q3-2022>.

¹⁷⁶ Discord, *Discord’s Commitment to Teen and Child Safety* (July 11, 2023),
<https://discord.com/safety/commitment-to-teen-child-safety>.

1 116. Discord promises parents that its app is different from other communication
2 products when it comes to child safety, assuring parents that “[w]e built Discord to be different
3 and work relentlessly to make it a fun and space for teens.”¹⁷⁷ “Discord is built on Safety,” and
4 “[s]afety is at the core of everything we do and a primary area of investment as a business.”¹⁷⁸

5 117. Discord specifically assures parents that its app is designed to keep children safe
6 and that it defaults to safety. Discord, for instance, in a website post titled “Settling into School
7 with Discord,” informs parents that “[m]any teams across Discord work together to ensure that
8 your teen finds belonging by building products and policies with safety by default.”¹⁷⁹ And in a
9 website post titled “Discord’s Commitment to Teen and Child Safety,” Discord promises parents
10 that “[w]e make our products safe spaces by design and default. Safety is and will remain part of
11 Discord’s core experience.”¹⁸⁰

12 118. Likewise, according to Discord’s 2023 “Parent’s Guide to Discord,” “Discord has
13 default settings designed to keep minors safe, such as automatically scanning direct messages for
14 explicit images and videos.”¹⁸¹ Those default settings, according to Discord, include “Teen Safety
15 Assist,” which (1) “automatically blur[s] media that may be sensitive in direct messages and
16 group direct messages with friends, as well as in servers,” and (2) sends “safety alerts” to teen
17 users when they receive a direct message from a user for the first time.”¹⁸²

18 ¹⁷⁷ *Id.*

19 ¹⁷⁸ Discord, *Discord’s Commitment to a Safe and Trusted Experience* (May 12, 2022),
20 <https://discord.com/safety/360043700632-discords-commitment-to-a-safe-and-trusted-experience>;
21 <https://discord.com/safety/commitment-to-teen-child-safety>.

¹⁷⁹ Savannah Badalich, *Settling into School with Discord*, Discord (Sept. 28, 2021),
<https://discord.com/safety/settling-into-school-with-discord>.

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

¹⁸¹ Discord, *Parent’s Guide to Discord*,
<https://web.archive.org/web/20230714165101/https://connectsafely.org/wp-content/uploads/2021/09/Parents-Guide-to-Discord.pdf> (archived July 14, 2023).

¹⁸² Savannah Badalich, *Building a Safer Place for Teens to Hang Out*, Discord (Oct. 24, 2023),
<https://discord.com/safety/safer-place-for-teens>.

1 119. While Discord represents that its app is designed to default to safety, it
2 simultaneously instructs parents on how to *change* the default safety settings to keep their child
3 safe. For years, Discord has consistently assured parents that they can use the company’s “tools to
4 protect [their children] from inappropriate content or unwanted contact.”¹⁸³ Discord, for example,
5 tells parents they can turn on an “explicit image filter” that will “[a]utomatically block direct
6 messages that may contain explicit images.”¹⁸⁴ Discord also informs parents that they can disable
7 the direct message setting that allows anyone in a server to privately message their children.
8 Discord also promises parents that they can change their child’s “Friend request settings” to limit
9 who can send them a friend request—*i.e.*, “Everyone,” Friend of friends,” or “Server
10 members.”¹⁸⁵

11 120. Discord’s CEO and co-founder Jason Citron recently reiterated many these
12 assurances nearly verbatim in his January 31, 2024 testimony to the U.S. Senate as part of its
13 hearing on “Big Tech and the Online Child Sexual Exploitation Crisis.” Citron began his written
14 testimony “by stating clearly that Discord has a zero-tolerance policy for content or conduct that
15 endangers or sexualizes children.”¹⁸⁶ Discord, according to Citron, “has a zero-tolerance policy
16 for inappropriate sexual conduct with children, meaning inappropriate sexual contact between
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¹⁸³ Discord, *Helping Your Teen Stay Safe on Discord* (May 12, 2022),
<https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord>; Discord,
Helping Your Teen Stay Safe on Discord,
<https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023).

¹⁸⁴ Discord, *Helping Your Teen Stay Safe on Discord*,
<https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023).

¹⁸⁵ *Id.*

¹⁸⁶ Hearing Before the U.S. Senate Committee on the Judiciary, Big Tech and the Online Child Exploitation Crisis, Testimony of Jason Citron, CEO and Co-Founder of Discord Inc. (Jan. 31, 2024), https://www.judiciary.senate.gov/imo/media/doc/2024-01-31_-_testimony_-_citron.pdf.

1 adults and teens on the service, with special attention given to predatory behaviors such as online
2 enticement and the sexual extortion of children, commonly referred to as ‘sextortion.’”¹⁸⁷

3 121. He also emphasized Discord’s “multi-pronged approach” to child safety, including
4 the company’s “approach to product development, whereby we implement a rigorous ‘safety by
5 design’ practice when developing products.”¹⁸⁸ As Citron elaborated, “[b]ecause safety is critical
6 to our core mission, Discord takes a ‘safety by design’ approach to our work.”¹⁸⁹

7 122. Citron also highlighted Discord’s “sophisticated tools” for parents to keep their
8 children safe, as well as the company’s “features designed to keep teens safe on our platform,”
9 such as Teen Safety Assist, which flags “potentially unwanted conversations to teen users in
10 Discord” and “automatically blur[s] potentially sensitive media to teens in DMs, GMS, and in
11 servers.”¹⁹⁰

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

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

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

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

187 *Id.*

188 *Id.*

189 *Id.*

190 *Id.*

1 “Tech Platforms Used by Online Child Sexual Abuse Offenders,” which contained survey data
2 from anonymous individuals searching for CSAM on the dark web. That survey revealed that
3 Discord is one of their “top platforms” for searching for, viewing, or sharing CSAM.¹⁹³ Based on
4 the results of this survey, the report found an “unmistakable overlap” between “the platforms
5 most used for viewing and sharing CSAM and the platforms most popular among children and
6 young people.”¹⁹⁴

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

9 160. From its beginning, Discord has been at the center of numerous criminal cases
10 involving CSAM. According to court documents from a federal case involving a vast CSAM
11 enterprise and conspiracy, between 2016 and 2018, ten men “utilized chatrooms on the online
12 service ‘Discord’—an application designed for online gaming communities that allows users to
13 engage in text chat and share images and videos—to produce and exchange child
14 pornography.”¹⁹⁵ They pled guilty and were sentenced to long prison terms. Similarly, according
15 to court documents in another case, between 2019 and 2020, a North Carolina man was able to
16

17 ¹⁹³ Protect Children, *Tech Platforms Used By Online Child Sexual Abuse Offenders* (Feb. 2024),
18 https://bd9606b6-40f8-4128-b03a-9282bdcfff0f.usrfiles.com/ugd/bd9606_0d8ae7365a8f4bfc977d8e7aeb2a1e1a.pdf.

19 ¹⁹⁴ *Id.*

20 ¹⁹⁵ U.S. Dep’t of Justice, *Ten Men Sentenced to Prison for Their Roles in a Child Exploitation Enterprise and Conspiracy* (Oct. 1, 2020),
21 <https://www.justice.gov/opa/pr/ten-men-sentenced-prison-their-roles-child-exploitation-enterprise-and-conspiracy>.

1 use Discord to chat about and trade CSAM.¹⁹⁶ He pled guilty and was sentenced to 240 months in
2 federal prison.

3 161. Similar incidents occurred throughout 2021 and 2022. In 2021, for example,
4 federal authorities arrested an Idaho man after locating numerous files of CSAM that he had
5 uploaded to his Discord account.¹⁹⁷ And in 2022, a Louisiana man pled guilty to possessing
6 CSAM, admitting that “he created a Discord account,” that “other Discord users would share
7 CSAM on the website,” and that he would “upload the saved CSAM from his phone to other
8 Discord users.”¹⁹⁸ Several months later, a New York man was arrested for uploading and
9 distributing CSAM using Discord.¹⁹⁹ And two months later, a University of Florida quarterback
10 was arrested and accused of sharing CSAM on Discord.²⁰⁰ When the man spoke with the police
11 after his arrest, he admitted that he had been on Discord servers that “discuss, solicit, and
12 distribute child sexual abuse material.”²⁰¹

12 ¹⁹⁶ U.S. Dep’t of Justice, *Man in Possession of Child Sexual Abuse Material Is Sentence to 20*
13 *Years in Prison* (Feb. 17, 2023),
<https://www.justice.gov/usao-wdnc/pr/man-possession-child-sexual-abuse-material-sentenced-20-years-prison>.

14 ¹⁹⁷ U.S. Dep’t of Justice, *Nampa Man Sentenced to 6 Years in Federal Prison Possessing Child*
15 *Pornography* (Dec. 12, 2023),
<https://www.justice.gov/usao-id/pr/nampa-man-sentenced-6-years-federal-prison-possessing-child-pornography>.

16 ¹⁹⁸ U.S. Dep’t of Justice, *Registered Sex Offender Pleads Guilty to Possession of Child Sex Abuse*
17 *Material* (May 10, 2022),
<https://www.justice.gov/usao-edla/pr/registered-sex-offender-pleads-guilty-possession-child-sexual-abuse-material>.

18 ¹⁹⁹ News 12 Staff, *Prosecutor: Phillipsburg Man Distributed Child Pornography Through Discord*,
News12 The Bronx (Sept. 28, 2022),
<https://bronx.news12.com/prosecutor-phillipsburg-man-distributed-child-pornography-through-discord>.

19 ²⁰⁰ Tim Stelloh & Antonio Planas, *University of Florida Quarterback Arrested and Accused of*
20 *Sharing Child Sexual Abuse Images on Discord*, NBC News (Nov. 30, 2022),
<https://www.nbcnews.com/news/us-news/university-florida-quarterback-arrested-allegedly-sharing-child-sexual-rcna59513>.

21 ²⁰¹ *Id.*

1 162. 2023 was no different. For example, at the start of the year, a New York man was
2 arrested and charged with creating and sharing CSAM through Discord after a police
3 investigation revealed that he had allegedly instructed a 13-year-old boy to provide images and
4 videos of himself committing sex acts on a 4-year-old girl.²⁰² The next month, a Vancouver man
5 was found guilty of numerous charges, including distributing and possessing CSAM, based
6 largely on communications and videos the man shared on Discord showing the sexual assault of
an infant by an adult man.²⁰³

7 163. These incidents continued throughout 2024. In February, for example, a New
8 Jersey man was arrested after an investigation revealed that he had uploaded to Discord a file
9 depicting the sexual exploitation or abuse of minors.²⁰⁴ At the time, the man was employed at a
10 school serving students as young as five years old. A few months later, an Oklahoma man was
11 arrested and charged with possessing and distributing CSAM after he shared CSAM on
12 Discord.²⁰⁵ Later that year, a former Indiana firefighter was arrested after police learned he was
trading CSAM on Discord.²⁰⁶

13 ²⁰² *West New York Man Charged with Child Abuse Material*, Hudson Reporter (Jan. 19, 2023),
14 [https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-m](https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-material/)
15 [aterial/](https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-material/).

16 ²⁰³ Fox 12 Staff, *Washougal Man Gets 108 Years for Child Rape, Creating Child Sex Assault*
17 *Materials*, Fox 12 Oregon (Mar. 25, 2023),
18 [https://www.kptv.com/2023/03/25/washougal-man-gets-108-years-child-rape-creating-child-sex-as](https://www.kptv.com/2023/03/25/washougal-man-gets-108-years-child-rape-creating-child-sex-as-sault-materials/)
19 [sault-materials/](https://www.kptv.com/2023/03/25/washougal-man-gets-108-years-child-rape-creating-child-sex-as-sault-materials/).

20 ²⁰⁴ Morris County Prosecutor's Office, *Jefferson Resident Arrested for Child Pornography* (Feb.
21 16, 2024),
[https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-Releases/Jefferson-Res](https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-Releases/Jefferson-Resident-Arrested-for-Child-Pornography)
[ident-Arrested-for-Child-Pornography](https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-Releases/Jefferson-Resident-Arrested-for-Child-Pornography).

22 ²⁰⁵ *Wagoner Man Arrested, Accused of Distributing Child Pornography Over Discord*, Fox 23
23 News (June 25, 2024),
24 [https://www.fox23.com/news/wagoner-man-arrested-accused-of-distributing-child-pornography-o](https://www.fox23.com/news/wagoner-man-arrested-accused-of-distributing-child-pornography-over-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html)
25 [ver-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html](https://www.fox23.com/news/wagoner-man-arrested-accused-of-distributing-child-pornography-over-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html).

26 ²⁰⁶ Joe Schroeder, *Docs: Ex-Indiana Firefighter Traded Porn on Discord, Dated a 17-year-old*,
27 Fox 59 (Sept. 4, 2024),
28 [https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-child-porn-on-discord-dated-](https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-child-porn-on-discord-dated-a-17-year-old/)
29 [a-17-year-old/](https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-child-porn-on-discord-dated-a-17-year-old/).

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

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

6 **165.** Discord hosts numerous servers that openly operate as spaces where children are
7 sexually exploited by predators. In its June 2023 article on Discord, NBC News reported that it
8 found numerous servers involving adults pretending to be teens to entice children into sharing
9 nude images. NBC News described several servers that explicitly solicited minors to join “not
10 safe for work” communities, including one server that promoted itself on the public server
11 database as “a community for people between the ages of 13-17. We trade nudes, we do events.
12 Join us for the best Teen-NSFW experience <3.”²⁰⁷ Another server claimed to accept “little girls
13 5-17 only” and had chat channels with titles such as “begging-to-have-sex-chat” and
14 “sexting-chat-with-the-server-owner.”²⁰⁸ Still another server directly solicited nude images from
15 minors to gain access: “YOU NEED TO SEND A VERIFICATION PHOTO TO THE OWNER.
16 IT HAS TO BE NUDE.”²⁰⁹

17 **166.** Other Discord servers are only slightly less obvious. For example, a server called
18 “Family Hideout” centered on an adult man who called himself “Dad” and built a “family” of
19 children online.²¹⁰ In this server, which was labeled “Friendly,” “Family,” and “All-Ages,”
20 the man developed relationships with children and encouraged them to take and share nude
21 images.

21 ²⁰⁷ Goggin, *supra* note 180.

²⁰⁸ *Id.*

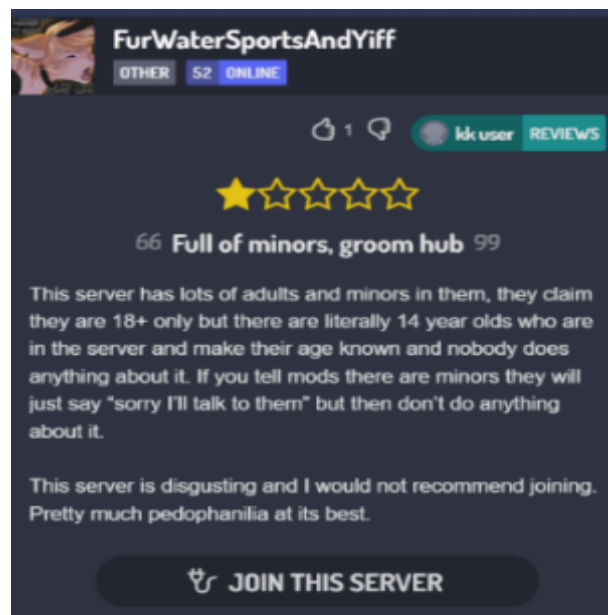
²⁰⁹ *Id.*

²¹⁰ National Center on Sexual Exploitation, *supra* note 179.



Family Hideout server in March 2023.

167. Other servers are more discreet yet are still widely known as places where children are groomed. For instance, a server called “FurWaterSportsAndYiff” was described as “Full of minors, groom hub” by one disgusted reviewer of the server. According to the reviewer, this server was filled with minors and adults and was “[p]retty much pedophilia at its best.”²¹¹



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

²¹¹ *Id.*

1 **168.** Through numerous well-documented and publicized cases, Discord has long
2 known that its app enables and facilitates the grooming, trafficking, and sexual abuse of minors.
3 For example, in its June 2023 article, NBC News reviewed publicly available information since
4 Discord was founded and identified 35 cases in the previous six years in which adults were
5 prosecuted on charges of kidnapping, grooming, or sexual assault that involved communications
6 on Discord.²¹² Because these cases were only those that were reported, investigated, and
7 prosecuted during that time, “What we see is only the tip of the iceberg,” explained a child safety
8 advocate.

9 **169.** Over the years, countless criminal cases have exposed the critical role that Discord
10 plays in enabling and facilitating grooming and other predatory conduct. In 2022, for instance, an
11 Indiana man pled guilty to sexual exploitation of a minor and possession of CSAM after the FBI
12 discovered that he had engaged in sexually explicit conversations with an 11-year-old girl on
13 Discord and coerced the girl into sending sexually explicit images of herself.²¹³ The girl later told
14 police that she communicated with the man via chats, video calls, and voice calls on Discord.
15 Later that year, an Oregon man was federally charged with child exploitation crimes following an
16 investigation that found he had “pretended to be an Oregon teenager to convince the child to
17 engage in sexually explicit acts during a video chat on Discord.”²¹⁴

18 **170.** Similar cases were brought throughout 2023 and 2024. In March 2023, for
19 example, a man was charged after he allegedly had a sexually explicit conversation with a
20

21 ²¹² Goggin, *supra* note 180.

²¹³ Phyllis Cha, *Marion County Corrections Employee Fired, Arrested Over Sexually Explicit Images to Girl*, *IndyStar* (Sept. 7, 2022), <https://www.indystar.com/story/news/crime/2022/09/07/corrections-officer-marion-county-employee-sexually-explicit-messages-to-child/65781240007/>.

²¹⁴ U.S. Dep’t of Justice, *Oregon Man Charged with Sexually Exploiting Minor on Discord, Additional Victims Sought* (Oct. 3, 2022), <https://www.justice.gov/usao-or/pr/oregon-man-charged-sexually-exploiting-minor-discord-additional-victims-sought>.

1 14-year-old girl and shared CSAM with her—all on Discord.²¹⁵ At the time, the man was a
2 middle-school science teacher and had engaged in this conduct at the school where he was
3 employed. And in 2024, a South Carolina man was sentenced to 20 years in federal prison after
4 he pled guilty to numerous crimes he committed against children on Discord, including coercing
5 minor girls into performing livestream sexual acts for him in a Discord call that he recorded.²¹⁶
6 The man also made repeated threats to the girls and their families, and one of the girls attempted
7 suicide because of this abuse.

8 171. Discord has also been at the center of numerous cases involving the kidnapping
9 and sexual assault of minors. For example, in 2021, a Virginia man was arrested and charged with
10 sexually exploiting and kidnapping a 12-year-old girl from her home in California.²¹⁷ According
11 to court documents, the man met and groomed the girl on Discord, flew to California and picked
12 her up at her house at 2:30 a.m., and was arrested at the Denver airport during a layover.

13 172. Similarly, in February 2023, a Michigan man was arrested and charged with
14 kidnapping a 14-year-old Washington girl whom he had met and groomed on Discord.²¹⁸ The next
15 month, a North Carolina man was arrested and charged with rape, child abduction, and human
16 trafficking after police rescued a 13-year-old from a locked shed behind his house.²¹⁹ According

17 ²¹⁵ *NJ Teacher Charged After “Sexually Explicit Conversation” with Teen*, New Jersey 101.5 (Mar.
18 3, 2023), <https://nj1015.com/nj-teacher-charged-after-sexually-explicit-conversation-with-teen/>.

19 ²¹⁶ Alan Hovorka, *Lowcountry US Army Member Who Groomed Girls, Recorded Child Porn on
20 Discord Sentenced to Prison*, Post & Courier (Aug. 3, 2024),
https://www.postandcourier.com/news/evan-bucci-child-porn-discord-grooming/article_09cf85ce-50dc-11ef-84b2-7b7358023542.html.

21 ²¹⁷ Dan Morse, *With Children Stuck at Home During Coronavirus Shutdowns, Online Sexual
Predators Can Swoop In*, Wash. Post (Feb. 12, 2023),
https://www.washingtonpost.com/local/public-safety/coronavirus-lockdown-child-exploitation/2021/02/04/90add6a6-462a-11eb-a277-49a6d1f9dff1_story.html.

²¹⁸ Ruth Bashinsky, *Washington State Girl, 14, Who Went Missing with “Man She met on Discord”
Near Notorious Sex Trafficking Corridor FOUND: Michigan Man Arrested over Kidnapping*,
Daily Mail (Feb. 1, 2024),
<https://www.dailymail.co.uk/news/article-13034633/washington-state-girl-missing-discord-sex-trafficking-michigan.html>.

²¹⁹ Peter Charalambous & Alexandra Faul, *Missing 13-year-old Rescued from Locked North*

1 to the girl's mother, the man had been communicating with her daughter for months on Discord
2 before he abducted her from her home in Dallas.

3 173. 2024 brought more of the same. In February, a Texas man was charged with
4 human trafficking and sexual assault of a 16-year-old girl whom he met and communicated with
5 on Discord.²²⁰ The girl told police that the man picked her up in Kansas and brought her to his
6 apartment in Texas, where they had sex multiple times. A few months later, a North Carolina man
7 was charged with kidnapping and raping a 12-year-old girl he had met on Discord.²²¹ Around the
8 same time, a Pennsylvania man was arrested and charged with multiple offenses, including rape
9 of a child and indecent assault of a person less than 13 years of age.²²² The police investigation
10 revealed that the man was communicating with the 12-year-old boy on Discord, which included
11 sexual conversations and making plans to meet.

12 174. Despite Discord's repeated assurances to parents that it has a "zero tolerance"
13 policy for the criminal acts described above and that its product is built on safety, the rampant
14 sexual exploitation of children on Discord has gotten only worse over the years—not better. John
15 Shehan, the Senior Vice President of the National Center for Missing and Exploited Children,

16 *Carolina Shed*, ABC News (Mar. 14, 2023),
17 <https://abcnews.go.com/US/missing-13-year-rescued-locked-north-carolina-shed/story?id=97830147>.

18 ²²⁰ Brittany Eubank, *Man and His Mother Charged After Missing Kansas Teen Found Safe in Central Texas*, KVUEabc (Feb. 8, 2024),
19 <https://www.kvue.com/article/news/crime/austin-human-trafficking-sexual-assault-missing-kansas-teen/269-361c25e3-12a8-4ec4-8779-0f962c12e8d1>.

20 ²²¹ "Under 13 Is Under 13": Judge Responds to Attorney's Claim That Man Charged with Kidnapping & Rape Believed 12-year-old Girl Was College Student, WRAL News (Apr. 16, 2024),
21 <https://www.wral.com/story/under-13-is-under-13-judge-responds-to-attorney-s-claims-that-man-charged-with-kidnapping-rape-believed-12-year-old-girl-was-col/21381250/>.

²²² Keith Heffintrayer, *Four Men Arrested Following Investigation into Sexual Abuse of 12-year-old Boy in Upper Gwynedd*, NorthPennNow (Apr. 15, 2024),
<https://northpennnow.com/news/2024/apr/15/four-men-arrested-following-investigation-into-sexual-abuse-of-12-year-old-boy-in-upper-gwynedd-police-say/>.

1 emphasized that his organization has seen “explosive growth” in CSAM and exploitation on
2 Discord.²²³ “There is a child exploitation issue on the platform. That’s undeniable,” he stated.

3 175. Indeed, for four consecutive years, the National Center on Sexual Exploitation
4 (“NCSE”) has named Discord to its “Dirty Dozen” list (which also includes Roblox, as discussed
5 above). As NCSE put it, “Discord enables exploiters to easily contact and groom children,” and
6 predators “take advantage of Discord’s dangerous designs to entice children into sending sexually
7 explicit images of themselves.”²²⁴

8 176. Discord itself confirms that this criminal conduct that it enables has only become
9 more pervasive. Discord, for example, revealed that in the fourth quarter of 2023, it received
10 416,036 reports from users regarding “Child Safety” issues, which includes CSAM.²²⁵ By the
11 next quarter, that number had grown to 1,035,166—a roughly 150% increase.²²⁶

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

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

19 ²²³ Goggin, *supra* note 180.

20 ²²⁴ National Center on Sexual Exploitation, *supra* note 58.

21 ²²⁵ Discord, *Discord Transparency Report: January – March 2023*,
https://cdn.prod.website-files.com/625fe439fb70a9d901e138ab/64b16dade9ba30617e30a40a_Q1%2023%20%7C%20Discord%20Transparency%20Report_%20JANUARY%20-%20MARCH%202023.pdf.

²²⁶ Discord, *Discord Transparency Report: January – June 2024*,
https://cdn.prod.website-files.com/625fe439fb70a9d901e138ab/67056a054d453d30491c1ac9_Discord%20Jan_Jun%202024%20Transparency%20Report.pdf.

1 178. Roblox and Discord designed their apps to work together seamlessly. As described
2 above, Roblox encourages users to communicate on Discord by allowing links to Discord servers
3 and channels to be displayed on game or group pages and by permitting users to include their
4 Discord usernames in their Roblox profiles. Discord, for its part, enables users to link their
5 Roblox accounts to their Discord accounts.²²⁷ Their “activity status” on Discord then shows other
6 users, including predators, when they are playing Roblox and what game they are playing. On
Discord, users can also send other users the codes for Robux gift cards to redeem on Roblox.

7 179. Through numerous media reports and well publicized criminal cases, Roblox and
8 Discord have long known that their apps jointly enable predators to systematically harm children.
9 For example, in 2019, a Florida man was arrested after law enforcement learned that he was using
10 Roblox and Discord to target children.²²⁸ According to authorities, the man targeted children
11 between ages 10 and 12 on Roblox and then coerced them on Discord into sending sexually
explicit images of themselves in exchange for Robux.

12 180. Similarly, in January 2022, a Florida man was arrested following a lengthy
13 investigation that revealed that he posed as a teen girl on Roblox to meet a 13-year-old boy and
14 then convinced the boy to send him sexually explicit images on Discord in exchange for Robux.²²⁹
15 Later that year, an Arizona man was arrested for kidnapping a 13-year-old boy he met on
Roblox.²³⁰ According to police, the man sent sexual and inappropriate messages on Roblox to the

16 ²²⁷ YouTube, *How to Link Roblox to Discord* (2025),
<https://www.youtube.com/watch?v=80ZEwlgecDM>.

17 ²²⁸ Max Chesnes, *Deputies Say Vero Beach Man Used Popular Video Game Platforms to Target*
Children, TCPalm (Aug. 20, 2019),
[https://www.tcpalm.com/story/news/crime/indian-river-county/2019/08/20/detectives-advice-onlin](https://www.tcpalm.com/story/news/crime/indian-river-county/2019/08/20/detectives-advice-onlin-e-safety-after-vero-beach-man-used-video-game-platforms-target-minors/2059599001/)
18 [e-safety-after-vero-beach-man-used-video-game-platforms-target-minors/2059599001/](https://www.tcpalm.com/story/news/crime/indian-river-county/2019/08/20/detectives-advice-onlin-e-safety-after-vero-beach-man-used-video-game-platforms-target-minors/2059599001/).

19 ²²⁹ Irene Wright, *Man Blackmailed Teen Boy as He Posed as Girl on Roblox and Discord, Florida*
Cops Say, Miami Herald (Aug. 11, 2023),
<https://www.miamiherald.com/news/state/florida/article278172607.html>.

20 ²³⁰ Jerry Lambe, *Arizona Man Allegedly Kidnapped a Boy He Lured from Discord. Police Say*
They Rescued the Victim Thanks to an “Alert Gas Station Attendant,” Law & Crime (Dec. 29,
2022),

1 boy and then invited him to join a Discord chat, where the man arranged to pick the boy up from
2 his house.

3 181. These real-life nightmares occurred repeatedly throughout last year. In November
4 2024, for example, the FBI arrested a Michigan man and charged him with numerous crimes
5 related to his sexual exploitation of possibly over 100 children.²³¹ The man told law enforcement
6 that “he used Roblox to talk to others sexually, some of whom he allegedly knew were children,”
7 and then transitioned the conversations to Discord and coerced the children into sending nude
8 images.²³²

9 182. And in January this year, a Louisiana man was arrested and federally charged for
10 sexually exploiting a teenage girl through Roblox and Discord.²³³ According to arrest records, the
11 man “began communicating with her on Roblox, before transitioning her to Discord,” where he
12 coerced her into sending sexually explicit images of herself.²³⁴

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

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

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

19 <https://lawandcrime.com/crime/arizona-man-allegedly-kidnapped-a-boy-he-lured-from-discord-police-say-they-rescued-the-victim-thanks-to-an-alert-gas-station-attendant/>.

20 ²³¹ Samantha Sayles, *Monroe County Man Uses Roblox, Discord, Snapchat to Sexually Assault Children*, ClickOnDetroit (Nov. 15, 2024),

<https://www.clickondetroit.com/news/local/2024/11/15/monroe-county-man-uses-roblox-discord-snapchat-to-sexually-exploit-children/>.

21 ²³² *Id.*

²³³ WAFB Staff, *Man Accused of Internet Sex Crimes Allegedly Met Victims on Roblox, Discord*, WAFB (Jan. 31, 2025),

<https://www.wafb.com/2025/01/31/man-accused-internet-child-sex-crimes-allegedly-met-victims-roblox-discord/>.

²³⁴ *Id.*

1 184. Although Discord began as a communications app for gamers, its co-founders
2 Jason Citron and Stanislav Vishnevskiy soon realized that Discord appealed to a much broader
3 audience and sought to expand its user base. “We saw an opportunity to make communications
4 easier for everyone, not just gamers,” Citron explained.²³⁵ So the company changed its motto
5 from “Chat for gamers” to “A new way to chat with your communities and friends” and became
hyper-focused on transforming into a universal communication product.²³⁶

6 185. Discord has since grown exponentially. In 2019, the company had 56 million
7 monthly active users.²³⁷ But with Discord’s shift away from gaming in 2020, combined with its
8 pandemic-driven explosion in popularity among young users, the company grew its monthly
9 active users to 150 million by 2022.²³⁸ Today, Discord boasts over 200 million monthly active
users.²³⁹

10 186. As Discord has grown, private investors have poured money into the company. In
11 June 2020, Discord raised \$100 million at a \$3.4 billion dollar valuation.²⁴⁰ Just five months later,
12 the company raised another \$100 million at more than double the valuation (\$6.90 billion).²⁴¹ In
13 early 2021, Discord rebuffed an acquisition offer from Microsoft of at least \$10 billion.²⁴² Later

14 ²³⁵ Nathan Latka, *Discord’s \$879M Revenue: 25 Moves to \$25B Valuation*, LATKA-B2B Saas
Blog (Jan. 15, 2025), <https://blog.getlatka.com/discord-revenue/>.

15 ²³⁶ Kellen Browning, *How Discord, Born from an Obscure Game, Became a Social Hub for Young
People*, N.Y. Times (Dec. 29, 2021),
<https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

16 ²³⁷ HelpLama, *Discord Revenue and Usage Statistics 2025*,
<https://helplama.com/discord-statistics/>.

17 ²³⁸ *Id.*

18 ²³⁹ Podcast Transcript, *Discord CEO Jason Citron Makes the Case for a Smaller, More Private
Internet*, The Verge (Apr. 22, 2024),
<https://www.theverge.com/24134914/discord-ceo-gaming-chat-teens-safety-moderation-decoder-i>
nterview.

19 ²⁴⁰ Equitybee, *Discord Funding History*,
<https://equitybee.com/companies/company?company=discord> (last visited Feb. 11, 2025).

20 ²⁴¹ *Id.*

21 ²⁴² Sarah E. Needleman, *Discord Ends Deal Talks with Microsoft*, Wall. St. J. (Apr. 20, 2021),
<https://www.wsj.com/articles/discord-ends-deal-talks-with-microsoft-11618938806>.

1 that year, it raised another \$500 million at a staggering valuation of \$14.5 billion.²⁴³ While
2 Discord has remained privately held so far, the company is expected to go public this year.²⁴⁴

3 187. A primary reason for investors' interest in Discord is its user growth, putting
4 enormous pressure on the company to prioritize growing its users above all else. Growing its
5 users is critical to the company's revenue and future profitability. Discord generates most of its
6 revenue from its subscription service called Nitro, which provides users with benefits such as
7 custom emojis, unlimited "super reactions," and HD video streaming. As the company expanded
8 its user base, its revenue skyrocketed from \$150 million in 2020 to \$600 million in 2024.²⁴⁵ And
9 while for years Discord shunned advertising on its app, the company recently started selling
10 advertisements to boost revenue by capitalizing on its massive and growing user base.²⁴⁶

11 188. Discord's growth strategy has focused on a user-centric approach that prioritizes
12 user preferences over child safety. As Discord CEO and co-founder Jason Citron put it, "We
13 focus on what our users love, and that drives everything we do."²⁴⁷ In practice, that has resulted in
14 Discord elevating the privacy of its users over protecting children in order to attract as many
15 users to its app as possible. For example, Discord continues to allow people to chat using fake
16 names and does not require individuals to enter their real names when registering for an account,
17 ensuring that predators will continue to flock to Discord because they can remain anonymous.
18 And while other digital platforms verify users' ages and restrict communications between

243 *Id.*

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

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

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

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

1 children and adults, Discord does not require age verification and does not restrict
2 communications between children and adults.

3 189. Discord even prioritizes user privacy over child safety with a feature it recently
4 added to supposedly allow parents to monitor their children's Discord use. In 2023, Discord
5 created its "Family Center for Parents and Guardians"—a "completely opt-in feature" that is "not
6 mandatory for teens."²⁴⁸ While this feature permits parents to monitor some of their children's
7 activity on Discord, it prohibits parents from accessing the most important information on their
8 accounts—the contents of their messages. As Discord tells children, "We value your privacy
9 which is why connected accounts will not have access to the contents of your messages."²⁴⁹
10 Discord also assures children that, with Family Center, "you have control over whether or not you
11 use this feature, how long you want to use it for, and who you connect your account to."²⁵⁰ By
12 putting children in charge of this parental feature, Discord seeks to preserve growth of this key
13 demographic.

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

17 191. Discord has also fought attempts to be held publicly accountable for the sexual
18 exploitation of children that its app enables. In November 2023, Discord's CEO and co-founder
19 Jason Citron refused to accept service of a subpoena to testify before the U.S. Senate as part of its
20 hearing on "Big Tech and the Online Child Sexual Exploitation Crisis."²⁵¹ Citron appeared at the

21 ²⁴⁸ Discord, *What Is Family Center?*,
[https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=W e%20value%20your%20privacy%20which, names%2C%20server%20icons%2C%20and%20member \(last visited Feb. 11, 2025\).](https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=W e%20value%20your%20privacy%20which, names%2C%20server%20icons%2C%20and%20member (last visited Feb. 11, 2025).)

²⁴⁹ *Id.*

²⁵⁰ *Id.*

²⁵¹ *Senate Panel Forced to Use U.S. Marshals to Subpoena CEOs of X and Discord to Testify on Protecting Kids Online*, CBS News (Nov. 21, 2023),

1 hearing only after the Senate was forced to enlist the U.S. Marshals Service to personally
2 subpoena him—a situation the Senate called “a remarkable departure from typical practice.”²⁵²

3 192. The National Center for Missing and Exploited Children, which internet
4 companies are by law required to report instances of child sex abuse to, also reported issues
5 working with Discord and had to rescind an invitation to become part of its Cybertipline
6 Roundtable when the company failed to “identify a senior child safety representative to attend.”²⁵³
7 “It was really questionable, their commitment to what they’re doing on the child exploitation
8 front,” stated John Shehan, the Senior Vice President of the National Center for Missing and
9 Exploited Children.²⁵⁴

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

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

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

19 195. Discord, for example, defaults to settings that allow predators to send direct
20 messages to children. Predators often identify and target children by joining servers that are
21 populated with kids. By default, Discord allows any two people who share a server to direct
message each other, providing predators with an easy means of contacting and communicating

22 <https://www.cbsnews.com/news/senate-panel-us-marshals-subpoenas-ceos-x-discord/>.

²⁵² *Id.*

²⁵³ Goggin, *supra* note 180.

²⁵⁴ *Id.*

1 with children. Predators also often initiate contact with children by adding a child as a “friend” on
2 Discord so they can direct message them. By default, Discord permits children to receive friend
3 requests from “Everyone,” meaning children can receive and accept friend requests from
4 individuals whom they do not know and with whom they have no connection.

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

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

11 The differences are pretty simple:

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

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

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

21 *Discord's description of the categories of its Safe Direct Messaging feature.*²⁵⁵

17 197. Consistent with Discord’s “default to safety” promise, the company long
18 represented that the “Keep me safe” option was on by default. In fact, though, Discord defaulted

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

1 not to this most restrictive setting but to the lower setting of “My friends are nice,” which meant
2 that Discord would not scan any images from a child’s “friend”—which could be anyone.

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

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

8 *Discord’s “Age-Restricted Content on Discord” webpage in 2022.*²⁵⁶

9 198. Discord later changed the labels of this feature from “Keep me safe” to “Filter all
10 direct messages” and from “My friends are nice” to “Filter direct messages from non-friends.”²⁵⁷
11 But it continued to default to the less restrictive setting: “By default, these filters are set to ‘Filter
12 direct messages from non-friends.’ Choose ‘Filter all direct messages’ if you want all direct
13 messages you receive to be filtered, or select ‘Do not filter direct messages’ to turn these filters
14 off.”²⁵⁸

15 199. Although parents can change Discord’s permissive default settings to more
16 restrictive ones, that option is meaningless because Discord enables children to modify these
17 safety settings without parental approval. So a parent might modify the default settings so that
18 their child cannot exchange direct messages with other server members or cannot receive friend
19 requests from “Everyone,” only to have their child simply change those settings to allow these
20 unfettered interactions. As Discord puts it, “[o]ur product architecture provides each user with
21 fundamental control over their experience on Discord including who they communicate with,

22 ²⁵⁶ Discord, *Age-Restricted Content on Discord*,
23 https://web.archive.org/web/20220406085122mp_/https://discord.com/safety/360043653552-Age-Restricted-Content-on-Discord (archived Apr. 6, 2022) (emphasis added).

24 ²⁵⁷ Discord, *Helping Your Teen Stay Safe on Discord*,
25 <https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023).

26 ²⁵⁸ *Id.*

1 what content they see, and what communities they join or create.”²⁵⁹ By doing so, Discord strips
2 parents of basic protective options that would prevent adult strangers from targeting and
3 exploiting their children. As one parent explained in calling Discord an “EXTREMELY
4 dangerous app,” Discord does not provide “any way for parents to set settings that can’t simply
be undone by kids.”²⁶⁰

5 200. Discord also refused to implement other simple measures that would have
6 protected children using its product. For example, despite having the ability to do so, Discord
7 does not require users to verify their age and identify when creating an account. Doing so would
8 have prevented predators from creating fake profiles and pretending to be children, which is their
9 preferred approach in targeting children and convincing them to share sexually explicit images.
10 Discord also could have implemented basic screening measures before allowing users on the app,
which would have ensured that known predators are not permitted on the app.

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

16 202. Discord also could have placed a higher age rating on its application in the iOS
17 App Store and other app stores to signal to parents that the app presented risks for children.
18 Discord likewise could have provided clear warnings to parents about the presence of sexual
19 predators on the platform, so that parents could make an informed decision about allowing their

20 ²⁵⁹ Discord, *Discord Parent Hub*, <https://discord.com/safety-parents> (last visited Feb. 11, 2025).

²⁶⁰ National Center on Sexual Exploitation, *supra* note 179.

1 child on the platform and/or educate their child on how to stay safe on the platform. Discord
2 could also have provided clear warnings to children about the presence of sexual predators on the
3 platform, and instructed children on how to stay safe on the platform.

4 203. Despite these glaring failures, Discord constantly promotes its technology-focused
5 “safety solutions” including its “AI-powered moderation systems.”²⁶¹ But this technology has
6 proven grossly inadequate and insufficient to protect children from sexual exploitation. For
7 instance, Discord’s Teen Safety Assist feature, which it introduced in October 2023, is supposed
8 to “automatically blur media that may be sensitive in direct messages and group direct messages
9 with friends, as well as in servers,” and send “safety alerts” to teen users when they receive a
10 direct message from a user for the first time.”²⁶² Yet this feature is “utterly defective,” according
11 to the National Center on Child Exploitation.²⁶³ As part of its annual investigation into Discord,
12 “NCOSE researchers were able to send sexually explicit content from an adult account to an
13 unconnected 13-year-old account, and no warning or resources were displayed.”²⁶⁴

14 204. Discord is also famously slow and ineffective at responding to child-safety issues.
15 One mother, for example, told CNN that Discord essentially refused to help her after she reported
16 that a man had communicated with her 10-year-old daughter and sent her links to pornography.²⁶⁵
17 Following the mother’s report, Discord sent her an automated message asking for “the message
18 links to the reported content for the team to review and take appropriate action.”²⁶⁶ After the
19 mother sent the requested links, Discord never responded. “There was no help at all,” she said.²⁶⁷

20 ²⁶¹ Discord, *Discord’s Commitment to Teen and Child Safety* (July 11, 2023),
21 <https://discord.com/safety/commitment-to-teen-child-safety>.

²⁶² Savannah Badalich, *Building a Safer Place for Teens to Hang Out*, Discord (Oct. 24, 2023),
<https://discord.com/safety/safer-place-for-teens>.

²⁶³ National Center on Sexual Exploitation, *supra* note 58.

²⁶⁴ *Id.*

²⁶⁵ Samantha Murphy Kelly, *The Dark Side of Discord for Teens*, CNN Business (Mar. 22, 2022),
<https://www.cnn.com/2022/03/22/tech/discord-teens/index.html>.

²⁶⁶ *Id.*

²⁶⁷ *Id.*

1 205. Child protection groups have also repeatedly highlighted flaws in Discord’s
2 approach to child safety. For example, Denton Howard, executive director of Inhope, an
3 organization of missing and exploited children hotlines from around the world, has flagged
4 numerous problems with Discord’s approach to child safety, including “slow response times to
5 reports, communications issues when [child protection] hotlines tried to reach out, hotlines
6 receiving account warnings when they try to report CSAM, the continued hosting of communities
that trade and create CSAM, and evidence disappearing before hearing back from Discord.”²⁶⁸

7 **VI. PLAINTIFF-SPECIFIC ALLEGATIONS**

8 124. Plaintiff is a 14-year-old girl who was manipulated and groomed through
9 Defendants’ dangerous apps by a predator who ultimately attempted to rape her but was thwarted
10 only because law enforcement intervened. Plaintiff has suffered devastating and life-altering
psychological trauma. Her life will never be the same.

11 125. Plaintiff was ten years old when she first started playing on Roblox. Plaintiff’s
12 father believed that Roblox was safe for children because it was designed and marketed for kids.
13 As discussed above, Roblox spent considerable time and money publicly touting the safety and
14 security of the app, which created the public perception that Roblox had created a safe
15 environment for kids. Unbeknownst to Plaintiff’s father at the time, this was nothing more than a
false façade of safety.

16 126. When Plaintiff was 12 years old, she began using Discord. Plaintiff’s father trusted
17 that Discord was a safe place for Plaintiff to communicate with her friends. As discussed above,
18 Discord spent considerable time and money publicly touting the safety and security of the app.
19 This created the public perception that Discord had created a safe environment for kids.
Unbeknownst to Plaintiff’s father at the time, this was nothing more than a false façade of safety.

20 ²⁶⁸ Goggin, *supra* note 180.

1 127. In 2024, when Plaintiff was 13 years old, she met a man on Roblox who told her
2 that he was also 13 but was in fact an adult predator. On Roblox, the predator groomed Plaintiff,
3 exploiting her age and vulnerability to build a false emotional connection with her.

4 128. After capturing Plaintiff's trust, the predator intensified his grooming of Plaintiff,
5 and their interactions continued not just on Roblox but also on Discord. He sent Plaintiff graphic
6 messages describing sexual acts he intended to do to her and sent her sexually explicit images of
7 himself. The predator encouraged secretive behavior, minimized the risks to Plaintiff, and
8 ensured that Plaintiff would not reveal any of their interactions to her parents.

9 129. The predator also used Roblox's virtual currency Robux to coerce Plaintiff into
10 continuing to interact with him. By regularly giving Plaintiff Robux, the predator was able to
11 manipulate Plaintiff's emotions and foster Plaintiff's dependency on him.

12 130. The predator ultimately convinced Plaintiff to meet him in person. Around January
13 2025, he traveled from another state to Alabama and arranged to meet Plaintiff at a fast-food
14 restaurant near her home. When the predator arrived there, he took Plaintiff to a nearby location
15 and attempted to rape her. Plaintiff resisted, and fortunately, law enforcement arrived during the
16 encounter, finding Plaintiff in a state of extreme distress. She was shirtless, with bruises on her
17 arms and legs. The predator had his genitals exposed and was attempting to forcibly remove
18 Plaintiff's pants to sexually assault her. Police arrested the predator, who is currently incarcerated.

19 131. Plaintiff has suffered profound harm from the grooming, manipulation, and
20 attempted rape that she experienced. Plaintiff has engaged in self-harming behaviors and was
21 hospitalized twice this year for psychiatric treatment. During these hospitalizations, she was
diagnosed with post-traumatic stress disorder, anxiety, and depression. She continues to suffer
from severe mental health issues, including difficulty trusting others, persistent anxiety, and
suicidal ideation, and she continues to need intensive therapeutic interventions. Her academic

1 performance has plunged, and she has behavioral issues in school that were not present
2 previously.

3 132. Defendants are directly responsible for the immense harm that Plaintiff has
4 suffered. Had Plaintiff's father known the truth about Defendants' apps, he never would have
5 permitted Plaintiff to use them without strict supervision. Had Defendants implemented even the
6 most basic system of screening or age and identity verification, as well as effective parental
7 controls, Plaintiff never would have interacted with this predator and never would have suffered
8 the harm that she did. Plaintiff's life has been devastated as a direct result of Defendants'
9 conduct.

10 **VII. CAUSES OF ACTION**

11 **FIRST CAUSE OF ACTION**

12 **FRAUDULENT CONCEALMENT AND MISREPRESENTATIONS**

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

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

15 207. This claim is brought against Defendants Roblox and Discord.

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

18 209. Each Defendant was under a duty to tell the public the truth and to disclose the
19 defective conditions of its app and that the app posed serious safety risks to child users. Instead of
20 disclosing the truth, each Defendant engaged in a widespread public campaign to tout the safety
21 of its app in the media, and in the materials provided to potential users of the app, as described
above.

1 210. Each Defendant made numerous false representations about the safety of its app,
2 as described above, which were specific and widespread. Plaintiff's father and the public at large
3 relied on each Defendant's false representations in deciding to allow children to play on the app.

4 211. Each Defendant was under a duty to tell the public, users, and their parents the
5 truth and to disclose the defective conditions of its app and that the app posed serious safety risks
6 to child users because each Defendant possessed superior knowledge about the dangers of its app
7 through internal reviews, external studies known to each Defendant, and parent and police reports
8 made to each Defendant.

9 212. Each Defendant breached its duty to the public, users, and their parents by
10 concealing and failing to disclose the serious safety risks presented by its app. Even though each
11 Defendant knew of those risks based on its internal reviews, external studies known to each
12 Defendant, and parent and police reports made to each Defendant, each Defendant intentionally
13 concealed those risks to not lose users and revenue, and to induce parents to allow their children
14 to use its app. Such risks were known only to each Defendant, and the public, users, and their
15 parents, including Plaintiff's father, could not have discovered such serious safety risks.

16 213. The public, users, and their parents, including Plaintiff's father, did not know of
17 the serious safety risks posed by the design of each Defendant's app, which were known by each
18 Defendant.

19 214. By intentionally concealing and failing to disclose defects inherent in the design of
20 its app, each Defendant knowingly and recklessly misled the public, users, and their parents,
21 including Plaintiff's father, into believing that its app was safe for children to use.

 215. Each Defendant knew that its concealment, omissions, and misrepresentations
were material. A reasonable person, including Plaintiff's father, would find information about the

1 risk of grooming, sexual abuse, sexual exploitation, and other serious risks associated with the
2 use of each Defendant's app, to be important when deciding whether to allow children to use it.

3 216. Each Defendant intended to deceive the public, users, and their parents, including
4 Plaintiff's father, by making misrepresentations and concealing the defects in the design of its
5 app, which made the app unsafe.

6 217. As a direct and proximate result of each Defendant's concealment of material
7 information and misrepresentations, Plaintiff's father was not aware and could not have been
8 aware of the facts that each Defendant concealed, and therefore justifiably and reasonably
9 believed that each Defendant's app was safe for children to use.

10 218. If the serious safety risks presented by the design of each Defendant's app had
11 been disclosed, the public, users, and their parents, including Plaintiff's father, reasonably would
12 have acted differently and/or would have not permitted children to use the app.

13 219. As a direct and proximate result of each Defendant's concealment of material
14 information and misrepresentations, Plaintiff sustained serious injuries and harm.

15 220. Each Defendant's concealment of material information and misrepresentations
16 were a substantial factor in causing harm to Plaintiff.

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

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

1 **SECOND CAUSE OF ACTION**

2 **NEGLIGENT MISREPRESENTATION**

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

4 184. Plaintiff incorporates each and every factual allegation set forth above.

5 185. This claim is brought against Defendants Roblox and Discord.

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

11 187. Each Defendant made numerous false representations about the safety of its app,
12 as described above, which were specific and widespread. Plaintiff's father and the public at large
13 relied on each Defendant's false representations in deciding to allow children to play on the app.

14 188. By making numerous material representations downplaying any potential harm
15 associated with its app and reassuring the public, users, and their parents, including Plaintiff, that
16 its app was safe, each Defendant negligently misled the public, users, and their parents, including
17 Plaintiff's father, into believing its app was safe for children to use.

18 189. Each Defendant had no reasonable grounds for believing that its
19 misrepresentations that its app was safe for children to use were true.

20 190. As a direct and proximate result of each Defendant's material omissions,
21 misrepresentations, and concealment of material information, Plaintiff's father was not aware and
could not have been aware of the facts that each Defendant misstated, and therefore justifiably
and reasonably believed that each Defendant's app was safe for use.

191. As a direct and proximate result of each Defendant's material omissions and misrepresentations, Plaintiff sustained serious injuries and harm.

192. Plaintiff's father's reliance on each Defendant's misrepresentations about the safety of its app were substantial factors in causing harm to Plaintiff.

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

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

THIRD CAUSE OF ACTION

NEGLIGENCE – GENERAL

(By Plaintiff Against Each Defendant)

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

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

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

198. Each Defendant owed Plaintiff a duty to exercise reasonable care in the development, setup, management, maintenance, operation, marketing, advertising, promotion, supervision, and control of its app and not to create an unreasonable risk of harm from and in the use of its app (including an unreasonable risk of grooming, sexual abuse, and sexual exploitation,

1 and other associated physical or mental injuries); to protect Plaintiff from unreasonable risk of
2 injury from and in the use of its app; and not to invite, encourage, or facilitate youth, such as
3 Plaintiff, to foreseeably engage in dangerous or risky behavior through, on, or as a reasonably
4 foreseeable result of using its app. These duties govern Defendants' own specific actions and are
5 based on direct actions Defendants took in developing their apps and features.

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

- 9 a. As businesses, Defendants owe a duty to protect customers against reasonably
10 foreseeable criminal acts of third parties and other dangers known to
11 Defendants on their apps;
- 12 b. Plaintiff, as a minor, was vulnerable and dependent on Defendants for a safe
13 environment on their apps, and Defendants have superior ability and control to
14 provide that safety with respect to activities that they sponsor or control;
- 15 c. Plaintiff relied upon Defendants for protection against third-party misuse or
16 misconduct;
- 17 d. The special relationship Plaintiff had with Defendants substantially benefits
18 Defendants through profits and growth in users and user activity. Defendants
19 could not successfully operate without the growth in users and user activity
20 generated by children;
- 21 e. Defendants were far more to Plaintiff than a business. Defendants provided
Plaintiff with opportunities for social interaction and a discrete community of
other users. Plaintiff was dependent on Defendants to provide structure,
guidance, and a safe environment;

- 1 f. Defendants have superior control over their app environments and the ability
2 to protect their users. Defendants impose a variety of rules and restrictions to
3 supposedly maintain a safe and orderly environment. Defendants employ
4 internal staff to enforce these rules and restrictions and can monitor and
5 discipline users when necessary. Defendants have the power to influence
6 Plaintiff's values, consciousness, relationships, and behaviors; and
7
8 g. Defendants have voluntarily undertaken a responsibility to keep children safe
9 on their apps. As alleged above, Defendants have publicly stated that they take
10 steps to keep children safe on their apps and therefore have undertaken a duty
11 to act reasonably in taking such steps.

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

13 201. Each Defendant knew that minors such as Plaintiff would use its app.

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

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

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

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

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

12 207. Each Defendant could have avoided Plaintiff's injuries with minimal cost,
13 including, for example, by not including certain features in its respective app which harmed
14 Plaintiff.

15 208. Imposing a duty on Defendants would benefit the community at large.

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

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

 211. Each Defendant breached its duties of care owed to Plaintiff through its
affirmative malfeasance, actions, business decisions, and policies in the development, set up,
management, maintenance, operation, marketing, advertising, promotion, supervision, and

1 control of its respective app. These breaches are based on Defendants' own actions in managing
2 their own apps made available to the public, independent of any actions taken by a third party.

3 Those breaches include but are not limited to:

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

- 1 e. Inviting children on their apps and marketing to children when Defendants
2 knew that their apps, as designed, were not safe for children.

3 212. Each Defendant breached its duties of care owed to Plaintiff through its
4 nonfeasance, failure to act, and omissions in the development, setup, management, maintenance,
5 operation, marketing, advertising, promotion, supervision, and control of its respective app.
6 These breaches are based on Defendants' own actions in managing their own apps made available
7 to the public, independent of any actions taken by a third party. Those breaches include but are
8 not limited to:

- 9 a. Failing to implement effective parental controls;
10 b. Failing to screen users before allowing them on the app;
11 c. Failing to implement effective parental notifications, such as when a child
12 messages another user, particularly an adult user, or when a child interacts with
13 accounts that have been blocked by other users or suspended in the past;
14 d. Failing to require adult users to provide a phone number when signing up for
15 an account;
16 e. Failing to implement pop-up safety notices within chats and games to warn
17 users about inappropriate behavior;
18 f. Failing to ban IP and MAC addresses of accounts associated with known
19 abusers;
20 g. Failing to set default safety settings to the most protective options;
21 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 their apps;
- n. Failing to separate adults from children on the apps by, for example, creating separate apps for children;
- o. Failing to adequately fund their trust and safety programs; and
- p. Others as set forth herein.

213. A reasonable company under the same or similar circumstances as Defendants 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.

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

215. As a direct and proximate result of each 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 to future sexual exploitation, attachment issues, identity confusion, and profound mental health issues such as depression, anxiety, and other harmful effects.

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

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

5 218. 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 Defendants' apps.

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

12 220. Plaintiff demands judgment against each 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
16
FOURTH CAUSE OF ACTION

17
NEGLIGENCE – FAILURE TO WARN

18
(By Plaintiff Against Each Defendant)

19 221. Plaintiff incorporates each and every factual allegation set forth above.

20 222. This claim is brought against Defendants Roblox and Discord.

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

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

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

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

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

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

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

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

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

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

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

- 15 a. Defendants fail to require that children have parental approval before signing
16 up for an account;
- 17 b. Defendants fail to screen users before allowing them on their apps;
- 18 c. New users of Defendants' apps can identify themselves as minors, begin to use
19 the app, and do so indefinitely, without ever receiving a safety warning, and
20 without ever having to provide information so that Defendants can warn the
21 users' parents or guardians;
- d. Defendants' apps' default safety settings allow adults and other strangers'
accounts to find, "friend," and communicate with children's accounts;

- e. Defendants' parental control settings allowed children to modify their own parental control settings;
- f. Defendants' platforms recommend that adult users and other strangers "friend" and contact child accounts;
- g. Defendants fail to block the IP and MAC addresses of known abusers;
- h. Adult predators use Defendants' apps to target children for sexual exploitation, sextortion, and CSAM;
- i. Defendants' apps enable and increase risk of exposure to predators and can result in grooming, sexual abuse, and sexual exploitation, as well as their resultant physical and mental injuries;
- j. Sexual predators use Robux to coerce children into sending them nude photos or engaging in other types of sexually explicit behavior;
- k. Usage of Defendants' apps can increase risky and uninhibited behavior in children, making them easier targets to adult predators for sexual exploitation, sextortion, and CSAM;
- l. Usage of Defendants' apps can normalize abuse and pornography, leading children to abuse other children either contemporaneously or later when the children are older;
- m. The likelihood and severity of harm is greater for children;
- n. The likelihood and intensity of these harmful effects is exacerbated by the interaction of each app's features with one another;
- o. Defendants fail to verify ages, allowing adult predators to pose as children on Defendants' apps;

1 p. Defendants' failure to verify ages allows children to bypass parental controls,
2 safety features, and default settings; and

3 q. Others as set forth herein.

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

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

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

13 236. As a direct and proximate result of each Defendant's failure to warn, Plaintiff
14 requires and/or will require more healthcare and services and did incur medical, health,
15 incidental, and related expenses.

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

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

239. The conduct of each Defendant, as described above, was intentional, fraudulent,
willful, wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and

1 displayed an entire want of care and a conscious and depraved indifference to the consequences
2 of its conduct, including to the health, safety, and welfare of their customers, and warrants an
3 award of punitive damages in an amount sufficient to punish each Defendant and deter others
4 from like conduct.

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

8 **FIFTH CAUSE OF ACTION**

9 **NEGLIGENCE – UNREASONABLE DESIGN**

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

11 241. Plaintiff incorporates each and every factual allegation set forth above.

12 242. This claim is brought against Defendants Roblox and Discord.

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

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

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

22 246. Each 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

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

8 247. Each Defendant owed a duty to all reasonably foreseeable users to design a safe
9 app.

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

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

16 250. Each Defendant knew that minors such as Plaintiff would use its app.

17 251. Each Defendant breached its respective duty in designing its app.

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

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

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

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

- 14 a. Requiring children have parental approval and a parent's email address to
15 sign-up for an account;
- 16 b. Effective parental controls;
- 17 c. Effective parental notifications, including notifying parents any time a child
18 messages another user, particularly an adult user, or notifying parents when
19 children interact with accounts that have been blocked by other users or
20 suspended in the past, among other controls;
- 21 d. Setting default safety settings to the most protective options, including
 blocking direct messaging between child and adult users, or only allowing
 messaging between adult users and a child with the parent's explicit
 permission to message the adult user;

- e. Requiring adults to provide a phone number when signing up for an account;
- f. Pop-up safety notices within chats and games to warn users about inappropriate behavior;
- g. Preventing strangers from sending Robux to child accounts, and preventing children from sending Robux to strangers' accounts;
- h. Banning IP and MAC addresses of accounts associated with known abusers;
- i. Controlled chat option;
- j. Providing a transcript of a child's communications to the parent;
- k. Implementing reporting protocols to allow users or visitors of Defendants' apps to report CSAM and adult predator accounts specifically without the need to create or log in to the apps prior to reporting;
- l. Robust age and identity verification;
- m. Reasonable age restrictions;
- n. Separating adults from children by, for example, creating separate apps for children; and
- o. Others as set forth herein.

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

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

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

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

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

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

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

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

SIXTH CAUSE OF ACTION

NEGLIGENT UNDERTAKING

(By Plaintiff Against Each Defendant)

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

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

1 266. Each Defendant rendered parental control services and account safety services to
2 Plaintiff's parents.

3 267. Defendants made numerous statements, as outlined above, claiming in substance
4 that their parental controls and account safety services were highly effective at protecting users
5 from the type of harm Plaintiff's son suffered.

6 268. Each Defendant knew, or reasonably should have known, that effective parental
7 control and account safety services were necessary for the protection of minor users.

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

10 270. Each Defendant could have avoided Plaintiff's injuries with minimal cost,
11 including, for example, by implementing parental control and account safety services that were
12 effective and that would prevent child users from being contacted by adult accounts or strangers'
13 accounts generally.

14 271. Imposing a duty on Defendants would benefit the community at large.

15 272. Imposing a duty on Defendants would not be burdensome to them because they
16 have the technological and financial means to avoid the risks of harm to children.

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

20 274. Plaintiff's father relied on each Defendant exercising reasonable care in
21 undertaking to render parental control and account safety services.

22 275. Each Defendant breached its duty of undertaking by failing to use reasonable care
23 in rendering its parental control and account safety services to prevent child users from being
24 contacted by adult accounts or strangers' accounts generally.

1 276. Each Defendant failed to exercise reasonable care in rendering these parental
2 control and account safety services.

3 277. Each Defendant's failure to exercise reasonable care increased the risk of, and was
4 a substantial factor in causing harm to Plaintiff.

5 278. Plaintiff was harmed by her father's reliance on Defendants to provide effective
6 parental control and account safety services.

7 279. Each Defendant's breach of one or more of its duties was a substantial factor in
8 causing harms and injuries to Plaintiff.

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

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

16 282. The conduct of each Defendant, as described above, was intentional, fraudulent,
17 willful, wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and
18 displayed an entire want of care and a conscious and depraved indifference to the consequences
19 of their conduct, including to the health, safety, and welfare of its customers, and warrants an
20 award of punitive damages.

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

SEVENTH CAUSE OF ACTION

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

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

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

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

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

1 **297.** Each Defendant's product is likewise defectively designed in that it creates an
2 inherent risk of danger; specifically, a risk of grooming, sexual abuse, and sexual exploitation,
3 which can lead to a cascade of harms. Those harms include but are not limited to physical injury,
4 damage to self-worth, stigma and social isolation, reduced academic performance, increased risky
5 behavior, susceptibility to future sexual exploitation, attachment issues, identity confusion, and
6 profound mental health issues for young consumers, including but not limited to depression,
7 anxiety, suicidal ideation, self-harm, post-traumatic stress disorder, insomnia, death, and other
8 harmful effects.

9 **298.** The risks inherent in the design of each Defendant's product significantly
10 outweigh any benefits of such design.

11 **299.** Defendants could have utilized cost-effective, reasonably feasible alternative
12 designs, including changes to the problematic features described above, to minimize the harms
13 described herein, including, but not limited to:

14 **a.** Requiring children have parental approval and a parent's email address to
15 sign-up for an account;

16 **b.** Effective parental controls;

17 **c.** Effective parental notifications, including notifying parents any time a child
18 messages another user, particularly an adult user, or notifying parents when
19 children interact with accounts that have been blocked by other users or
20 suspended in the past, among other controls;

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

- 1 e. Requiring adults to provide a phone number when signing up for an account;
- 2 f. Pop-up safety notices within chats and games to warn users about
- 3 inappropriate behavior;
- 4 g. Preventing strangers from sending Robux to child accounts, and preventing
- 5 children from sending Robux to strangers' accounts;
- 6 h. Banning IP and MAC addresses of accounts associated with known abusers;
- 7 i. Controlled chat option;
- 8 j. Providing a transcript of a child's communications to the parent;
- 9 k. Implementing reporting protocols to allow users or visitors of Defendants'
- 10 products to report child sex abuse material and adult predator accounts
- 11 specifically without the need to create or log in to the products prior to
- 12 reporting;
- 13 l. Robust age and identity verification;
- 14 m. Reasonable age restrictions;
- 15 n. Separating adults from children by, for example, creating separate apps for
- 16 children; and
- 17 o. Others as set forth herein.

18 300. Alternative designs were available that would prevent child predators from

19 finding, grooming, and exploiting children, and which would have served effectively the same

20 purpose of Defendants' products while reducing the gravity and severity of danger posed by

21 those products' defects.

301. Plaintiff used Defendants' respective products as intended or in reasonably

 foreseeable ways.

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

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

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

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

15 **306.** As a direct and proximate result of each Defendant's respective product's
16 defective design, Plaintiff suffered serious and dangerous injuries.

17 **307.** As a direct and proximate result of each Defendant's product's defective design,
18 Plaintiff requires and/or will require more healthcare and services and did incur medical, health,
19 incidental, and related expenses.

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

1 **309.** The nature of the fraudulent and unlawful acts that created safety concerns for
2 Plaintiff are not the type of risks that are immediately apparent from using Defendants'
3 respective products.

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

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

13 **EIGHTH CAUSE OF ACTION**

14 **STRICT LIABILITY – FAILURE TO WARN**

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

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

17 313. This claim is brought against Defendants Roblox and Discord.

18 **314.** At all relevant times, each Defendant designed, developed, managed, operated,
19 tested, produced, labeled, marketed, advertised, promoted, controlled, sold, supplied, distributed,
20 and benefitted from its product used by Plaintiff.

21 **315.** These products were designed, manufactured, maintained, controlled and
distributed from the respective California headquarters of each Defendant.

316. Each Defendant's product was designed and intended to be a gaming and/or
communication product. The software and architecture of each product is the same for every user

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.

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

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

14 319. Defendants were in the best position to know the dangers their products posed to
15 consumers, including Plaintiff, as they had superior knowledge of the risks and dangers posed by
16 their products and had exclusive knowledge of these risks at the time of development, design,
17 marketing, promotion, advertising and distribution. Defendants had exclusive control of their
18 products at all times relevant to this litigation.

19 320. Each Defendant's respective product is dangerous, to an extent beyond that
20 contemplated by the ordinary user who used Defendants' products, because they enable predators
21 to find, groom, abuse, and exploit children.

321. Each Defendant knew or, by the exercise of reasonable care, should have known
that its respective product posed risks of harm to youth considering its own internal data and

1 knowledge regarding its product at the time of development, design, marketing, promotion,
2 advertising, and distribution.

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

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

9 a. Sexual predators use Defendants' products to find, contact, groom and abuse
10 children with alarming frequency;

11 b. Sexual predators use Defendants' products to solicit, produce, and distribute
12 CSAM with alarming frequency;

13 c. Sexual predators target young children for CSAM on Defendants' products
14 with alarming frequency;

15 d. Sexual predators use Robux to coerce children into sending them nude photos
16 or engaging in other types of sexually explicit behavior;

17 e. Defendants' products are designed in a way that enables and increases risk of
18 exposure to predators and resulting sexual exploitation;

19 f. Defendants' products cause grooming, sexual abuse, and sexual exploitation,
20 and its resultant physical and mental injuries;

21 g. Use of Defendants' products can increase risky and uninhibited behavior in
children, making them easier targets to adult predators for sexual exploitation,
sextortion, and CSAM;

1 h. Use of Defendants' products can normalize abuse and pornography, leading
2 children to abuse other children either contemporaneously or later when the
3 children are older;

4 i. New users of Defendants' product can identify themselves as minors, begin to
5 use the product, and do so indefinitely, without ever receiving a safety
6 warning, and without ever having to provide information so that Defendants
7 can warn the users' parents or guardians;

8 j. Defendants' failure to verify ages allows children to bypass parental controls,
9 safety features, and default settings;

10 k. The likelihood and severity of harms is greater for children;

11 l. The likelihood and intensity of these harmful effects is exacerbated by the
12 interaction of each product's features with one another; and

13 m. Others as set forth herein.

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

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

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

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

23 328. Plaintiff was injured from using both of Defendants' defective products through no
24 fault of her own. The fact that Plaintiff was injured by using both of Defendants' products means

1 that Defendants are each jointly and severally responsible for the injuries caused by any one of
2 Defendants' products and the burden shifts to Defendants to identify alternative causes of the
3 alleged injuries and apportion responsibility for the alleged injuries.

4 **329.** 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 Defendants' products.

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

12 **331.** Plaintiff demands judgment against each 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 **VIII. PRAYER FOR RELIEF**

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

- 18 1. Past, present, and future general damages, the exact amount of which has yet to be
19 ascertained, in an amount which will confirm to proof at time of trial, to
20 compensate Plaintiff for injuries sustained as a result of the use of Defendants'
21 products, including but not limited to physical pain and suffering, mental anguish,
loss of enjoyment of life, emotional distress, and expenses for medical treatments;
2. Past, present, and future economic and special damages, according to proof at the
time of trial;

3. Impaired earning capacity according to proof at the time of trial;
4. Medical expenses, past and future, according to proof at the time of trial;
5. Punitive or exemplary damages according to proof at the time of trial;
6. Attorneys' fees;
7. For costs of suit incurred herein;
8. Pre-judgment and post-judgment interest as provided by law;
9. For nonmonetary injunctive relief; and
10. For such other and further relief as the Court may deem just and proper.

IX. DEMAND FOR A JURY TRIAL

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

Date: July [X], 2025

Respectfully submitted,

ANAPOL WEISS

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**Pro Hac Vice motions forthcoming*