

1 R. Lee Page
lee@wefightyourbattle.com
2 **BATTLE LAW, PLLC**
3 600 Cleveland Street, Suite 250
Clearwater, FL 33755
4 Telephone: (866) 922-8853

5 Matthew A. Dolman (*pro hac vice* forthcoming)
matt@dolmanlaw.com

6 R. Stanley Gipe (*pro hac vice* forthcoming)
stan.gipe@dolmanlaw.com

7 Sara D. Beller (*pro hac vice* forthcoming)
sara.beller@dolmanlaw.com

8 **DOLMAN LAW GROUP**

9 800 N. Belcher Rd.
Clearwater, FL 33765
10 Telephone: (727) 451-6900
11 Facsimile: (727) 451-6907

12 *Attorneys for Plaintiff John Doe and His Next Friend Jane Doe*

13 **SUPERIOR COURT FOR THE STATE OF GEORGIA**

14 **COUNTY OF DEKALB**

16 JANE DOE, as guardian and next friend of
17 minor plaintiff, JOHN DOE,

18 Plaintiff,

19 v.

20 ROBLOX CORPORATION,

21 Defendant.
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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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Jane Doe, as guardian and next friend of minor Plaintiff John Doe (“Plaintiff”), brings this action against Roblox Corporation (“Roblox” or “Defendant”) to recover damages arising from the severe injuries that Plaintiff suffered because of Defendant’s conduct in creating, designing, marketing, and distributing its mobile- and web-based application (“app”), and alleges as follows:

I. INTRODUCTION

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

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

3. The reason for Defendant’s unlawful conduct is simple: Defendant prioritizes growing the number of users of its app 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 happy.”¹ Defendant’s prioritization of growth over the safety of children has devastated the lives of children who use its app.

4. Plaintiff is currently a 10-year-old boy who was an avid user of Defendant’s app for several years. He relied heavily on the app for entertainment and social interaction, making him a

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

1 prime target for the countless child predators that Defendant knew were freely roaming the app
2 looking for vulnerable children.

3 5. Plaintiff—at only 9 years old—was targeted on Roblox by multiple predators who
4 posed as fellow children. They exploited Plaintiff’s age and vulnerability to build a false emotional
5 connection with him by promising friendship and connection. After capturing his trust, the
6 predators escalated their grooming of Plaintiff on Roblox. They sent Plaintiff graphic messages and
7 sent him sexually explicit images and pornographic videos. The predators’ dangerous behavior
8 escalated even further. They repeatedly harassed Plaintiff—for months—ultimately extorted
9 Plaintiff to send the sexually explicit images and videos to Plaintiff’s friends at school.

10 6. Plaintiff suffered this sexual exploitation and abuse as the direct result of
11 Defendant’s conduct. For years, Defendant has misrepresented and deliberately concealed
12 information about the pervasive predatory conduct that its app enables and facilitates. Had
13 Defendant disclosed the truth of what was really occurring on its app, Plaintiff’s mother would
14 never have permitted Plaintiff to use this app without her strict supervision. Had Defendant taken
15 any steps to screen users before allowing them on the apps, Plaintiff would not have been exposed
16 to the large number of predators trolling the platform. Had Defendant implemented even the most
17 basic system of age and identity verification, as well as effective parental controls, Plaintiff would
18 never have engaged with this predator and never been harmed.

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

1 **II. PARTIES**

2 **A. Plaintiff**

3 8. Minor Plaintiff John Doe, and his mother and next friend Jane Doe, are citizens and
4 residents of the State of Georgia, with a principal place of residence in DeKalb County.

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

10 10. Plaintiff never entered into any contract with Defendant. To the extent Defendant
11 claims that Plaintiff attempted to accept an electronic terms and conditions clause by clicking
12 buttons on a screen that included language that Plaintiff did not read or understand, such an
13 assertion is legally erroneous, invalid, and unenforceable, including because Plaintiff disaffirms
14 any such contract, including any forced arbitration clause and any delegation clause in any contract.

15 **B. Defendant**

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

21 **III. JURISDICTION AND VENUE**

22 12. This Court has jurisdiction over this action because Plaintiff did, at all times
23 relevant, and does reside in DeKalb County and the amount in controversy exceeds the jurisdiction
24 minimum of this Court. This Court has jurisdiction over Defendant Roblox because Defendant
25 regularly conduct and solicit business in the State of Georgia, provide products and/or services by
26 or to persons here, and derive substantial revenue from the same. Defendant affirmatively and
27 extensively engages with a significant percentage of this State's residents through messages,
28 notifications, recommendations, and other communications. Further, a substantial part of the events

1 or omissions giving rise to the claims, caused by Defendant Roblox, occurred in the State of
2 Georgia.

3 13. Venue is proper here because a substantial part of the events or omissions giving
4 rise to the claims occurred herein.

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

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

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

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

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

21 17. Roblox designed its app for children. Roblox has marketed its app not only as the
22 “#1 gaming site for kids and teens”⁴ but also as an educational experience for young users. Roblox
23 claims that it provides “new gateways into learning”—from “chemistry to physics to robotics and
24

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

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

28 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 “high-quality,
3 standards-aligned, immersive educational experiences designed by curriculum 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”

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

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

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

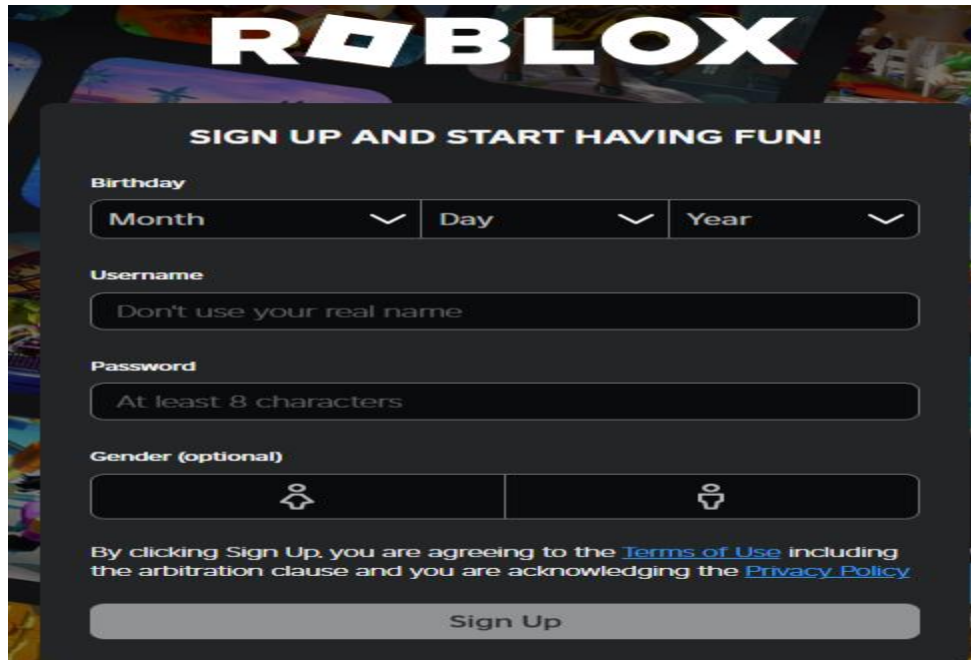
23 21. Individuals who wish to play Roblox must create an account. It is extremely easy to

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

27 ⁶ *Id.*

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

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

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

16 *Roblox Sign-up Screen*

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

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



Example default avatar on Roblox.

24. 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.

25. 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.

26. Now, under Roblox's default settings, adults cannot directly message children under 13, but Roblox still does nothing to prevent children this young from creating accounts with fake 13+ birthdates, which gives them full access to Roblox's direct-messaging options. Roblox still

1 relies on self-reported birthdates for age verification. Further, children 13 and over are still
2 vulnerable to receiving friend requests—or direct messages within Roblox experiences—from adult
3 strangers. There is also nothing that prohibits adults from entering fake birthdays and posing as
4 children in their attempts to friend or otherwise communicate with children users.

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

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

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

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

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

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

28 ⁹ Roblox, *Frequently Asked Questions (FAQs)*,

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

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

22 <https://web.archive.org/web/20071105104643/http://www.roblox.com/Parents/FAQs.aspx>
23 (archived Nov. 5, 2007).

24 ¹⁰ Roblox, *Keeping Kids Safe*,
25 [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)
26 [spx](https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx) (archived May 1, 2008); *see also* Roblox, *Information for Parents*,
27 <https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents> (archived Jan. 31,
28 2016).

¹¹ *Id.*

¹² Roblox, *Parents’ Guide*,
27 <https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/> (archived Jul. 16,
28 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.



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12 *Excerpt from Roblox Parent's Guide in 2017*

13 33. Roblox's website representations have remained largely unchanged since then. In
14 2023, for example, Roblox assured parents that it "continually develop[s] cutting-edge technologies
15 to ensure that the Roblox platform remains a safe and fun space for players all over the world."¹⁴
16 Roblox claimed that the company was "dedicated to working together with parents and digital safety
17 experts to promote a family-friendly environment that allows all players to imagine, create, and play
18 online."¹⁵ Roblox emphasized that it is "committed to ensuring that Roblox is a safe and fun place
19 for everyone."¹⁶ According to Roblox, it "goes above and beyond to foster an environment where
20 people of any age can create, play, learn, and imagine safely. We've kept children's privacy and
21 safety top-of-mind when designing our platform, especially through the implementation of advanced
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25 ¹⁴ Roblox, *For Parents*,
26 <https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/> (archived
27 Apr. 5, 2023).

28 ¹⁵ *Id.*

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

1 text filters that block inappropriate language or other unsafe content.”¹⁷

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

7 35. 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”;
13 and its chat filters for inappropriate content, which “are even stricter” for children under 13 and
14 “include any potentially identifiable personal information, slang etc.”²¹

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

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

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

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

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

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

²¹ *Id.*

1 inappropriate,” Roblox “investigate[s] immediately.”²²

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

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

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

Parents

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

21 41. Such statements by Bhaumik date back years. In 2018, Bhaumik told the *Washington*
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25 ²² Eric Frenchman, *Revisiting Roblox*, Pardon My French (Oct. 5, 2009),

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

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

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

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

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

19 ²⁵ Hayley Tsukayama, *Roblox, an Online Kids Game, Explains How a Hack Allowed a*
20 *Character’s Virtual ‘Rape’*, Wash. Post. (Jul. 17, 2018),

21 <https://www.washingtonpost.com/technology/2018/07/17/roblox-an-online-kids-game-explains-how-hack-allowed-characters-virtual-rape/>.

22 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),

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

24 ²⁷ *Id.*

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

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

26 ²⁹ *Id.*

³⁰ *Id.*

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

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

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

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

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

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

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

23 ³³ *Id.*

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

26 ³⁵ *Id.*

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

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

³⁸ Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety*
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 **C. In Reality, Roblox Is a Digital and Real-Life Nightmare for Children.**

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

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

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

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

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

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

25
26 _____
27 ³⁹ See, e.g., YouTube, *How to Do Roblox Sex Glitch*,
28 https://www.youtube.com/watch?v=Zz97Q1SQE_k; see also YouTube, *Roblox Sex?*,
<https://www.youtube.com/watch?v=hyqCHG6nUYI>.

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

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

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

26 ⁴¹ *Id.*

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

⁴³ Hindenburg, *supra* note 1.

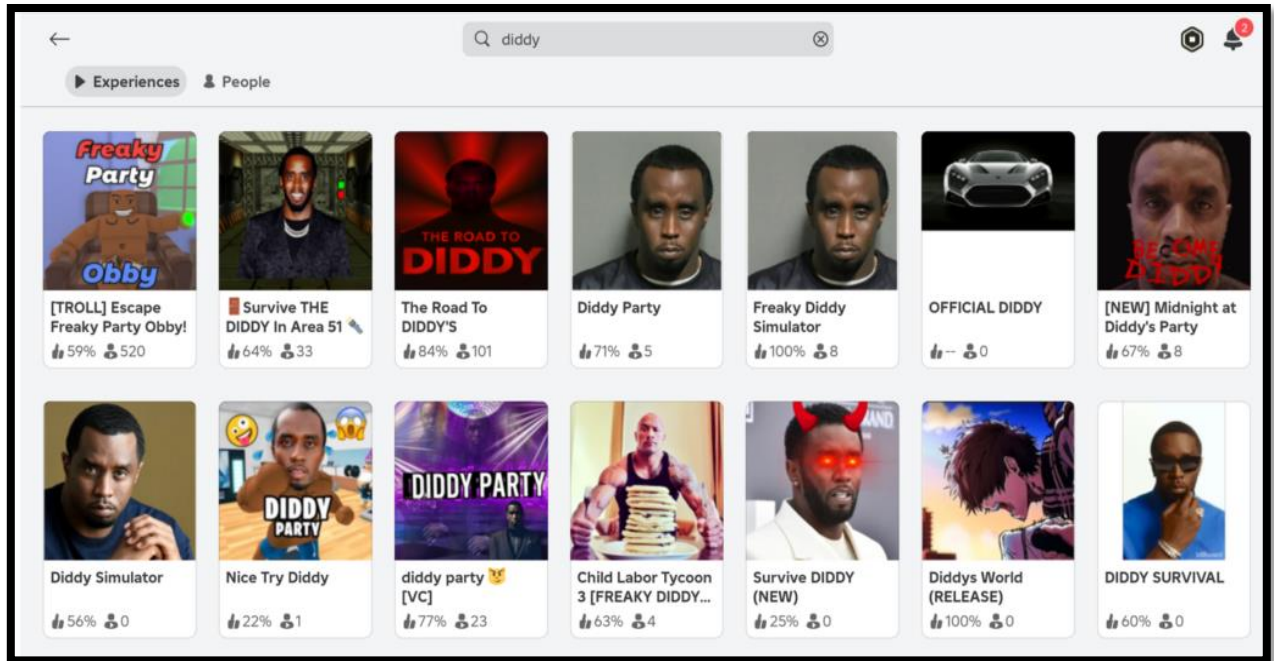
⁴⁴ Dickson, *supra* note 42.



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

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

⁴⁵ Hindenburg Research, *supra* note 1.



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

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



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

⁴⁶ *Id.*

⁴⁷ *Id.*

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

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

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

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

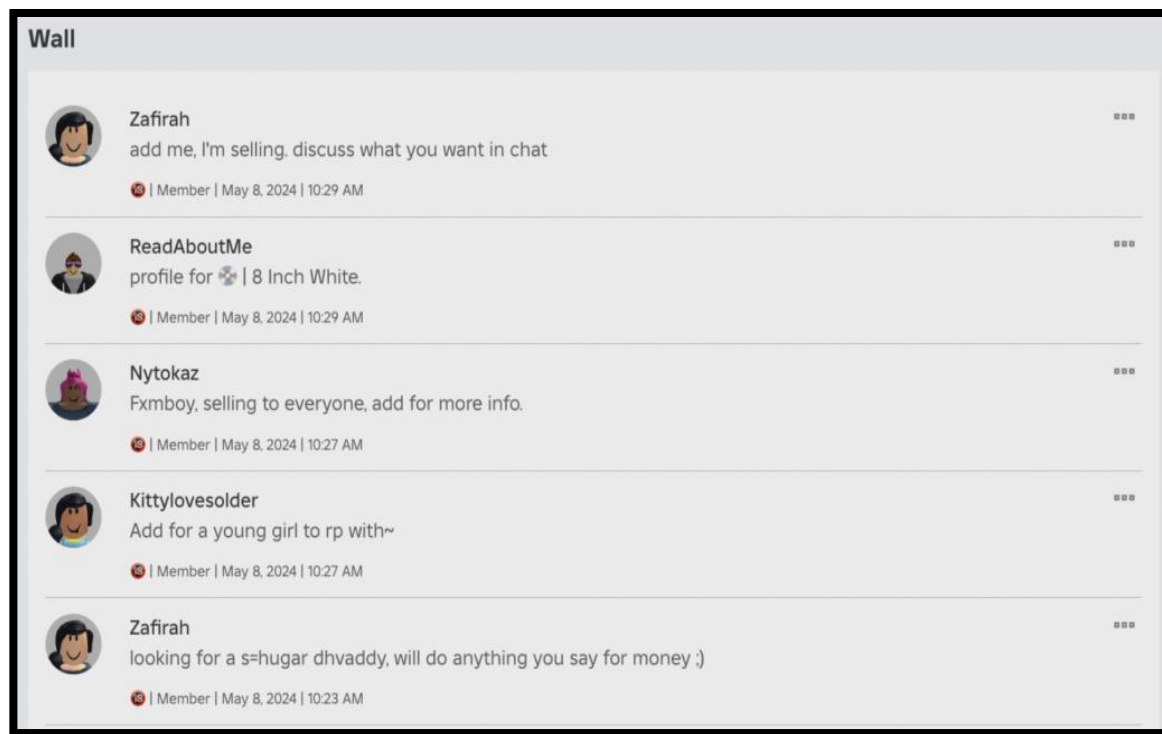
24
25 ⁴⁸ Joseph Cox & Emanuel Malberg, *Leaked Documents Reveal How Roblox Handles Grooming*
26 *and Mass Shooting Simulators*, Vice (Aug. 1, 2022), [https://www.vice.com/en/article/leaked-](https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/)
[documents-how-roblox-moderates-content-mass-shootings-grooming/](https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/).

27 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).

28 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.

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

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



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

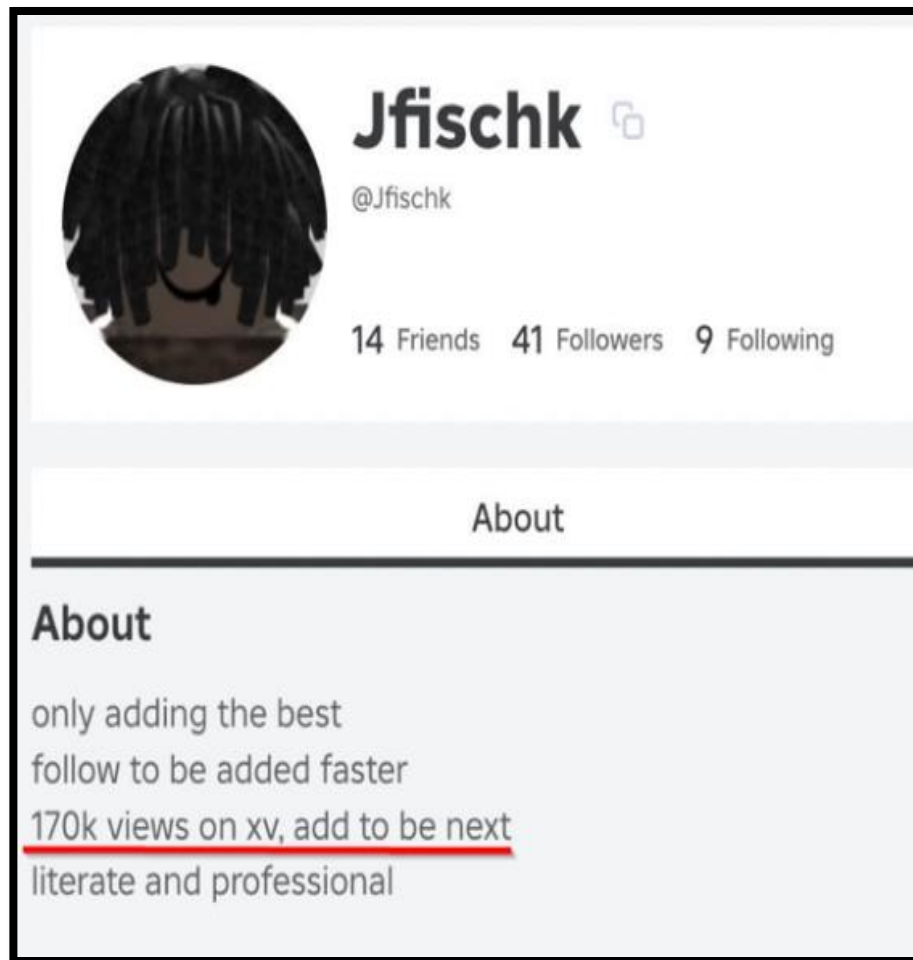
26 ⁵¹ Hindenburg Research, *supra* note 1.

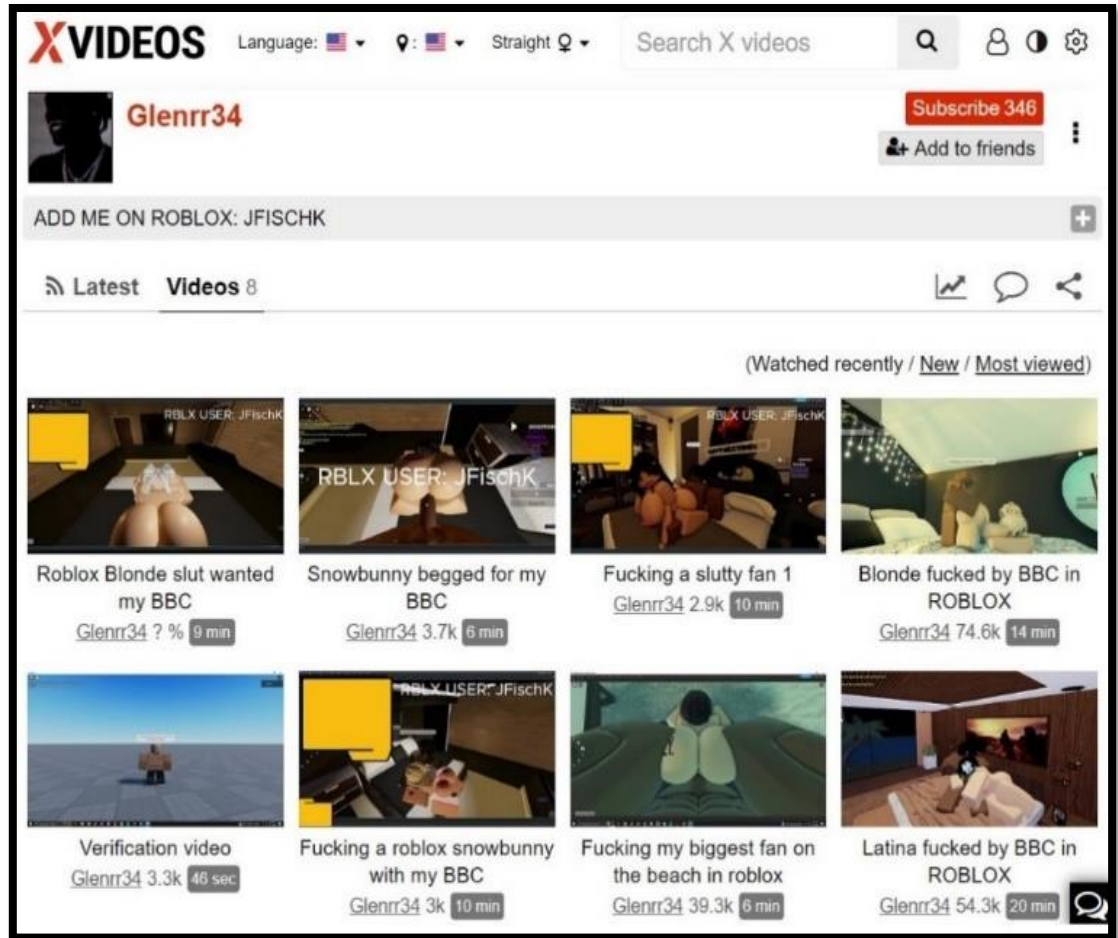
27 ⁵² *Id.*

28 ⁵³ *Id.*

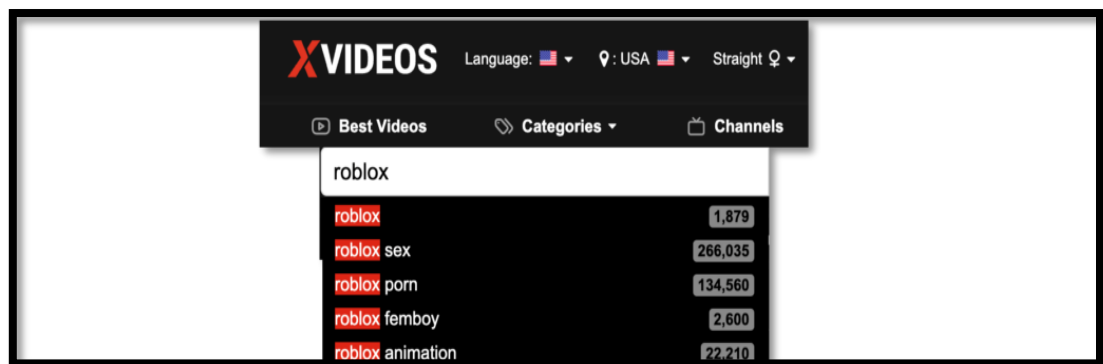
⁵⁴ *Id.*

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





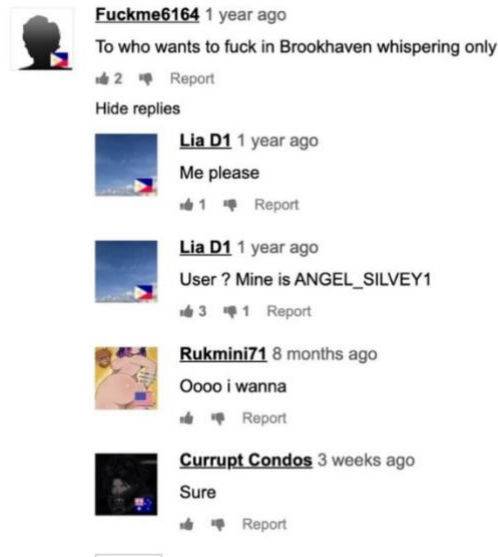
This Roblox user advertised their Roblox account on porn website, XVideos, where they had uploaded videos of their avatar having sex with other Roblox users.⁵⁵



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

63. 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.

64. 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.

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

⁵⁷ *Id.*

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

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

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

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

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

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

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

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

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

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

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

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

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

23 75. In 2018, Roblox's app enabled a predator posing as a child to coerce a nine-year-old
24 girl into performing and filming sexually abusive acts on her four-year-old brother through violent
25

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

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

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

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

20 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>.

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

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

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

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

28 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>.

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

5 78. 2023 was more of the same. For example, a 30-year-old man was arrested for
6 soliciting illicit photos from young victims and authorities reported that he had three separate
7 Roblox accounts.⁷⁰ A 27-year-old man was arrested for kidnapping an 11-year-old girl whom he
8 met on Roblox.⁷¹ A 23-year-old New Jersey man, who was a prominent Roblox developer with a
9 known history of exploiting children via Roblox, was sentenced to 15 years in prison for grooming
10 a 15-year-old girl, transporting her to his house, and sexually abusing her.⁷²

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

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

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

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

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

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

28 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),
<https://www.latimes.com/california/story/2024-08-22/chilean-arrest-roblox-child-exploitation>.

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

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

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

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

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

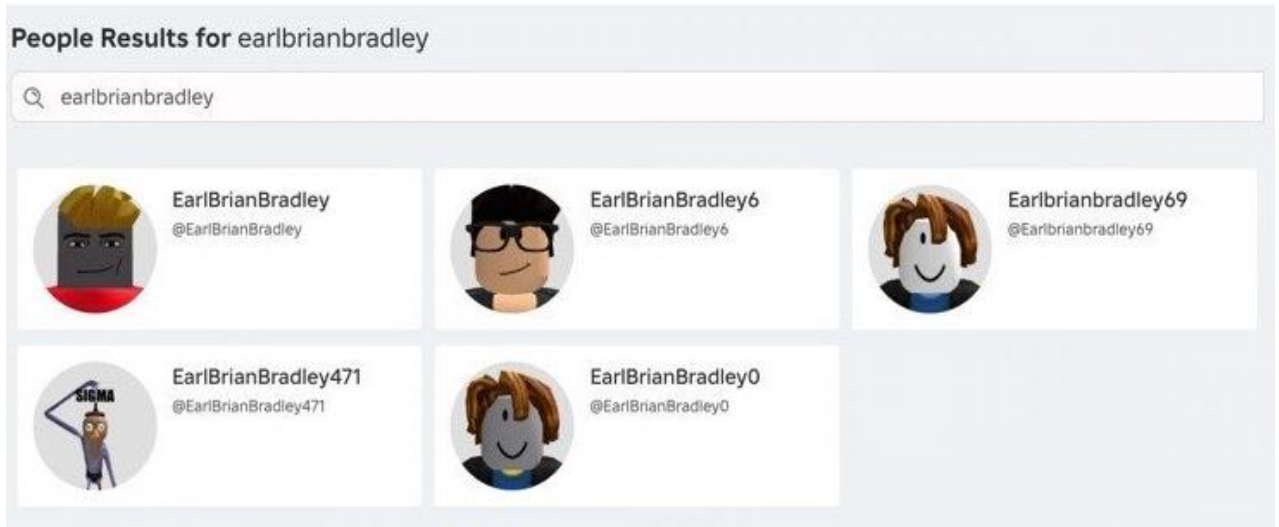
25 ⁷⁷ Martin Robinson, *Roblox Predator Who Raped 10-year-old Girl is Locked Up: Paedophile Who*
26 *‘Targeted Child He Met on Gaming Platform Is Jailed for Six Years*, Daily Mail (Jan. 17, 2025),
27 <https://www.dailymail.co.uk/news/article-14278563/Roblox-predator-raped-10-year-old-girl.html>.

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

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-](https://www.nbcmiami.com/news/local/ocala-17-year-old-convinced-kids-to-send-him-sex-abuse-material-on-roblox-sheriff/3605691/)
[convinced-kids-to-send-him-sex-abuse-material-on-roblox-sheriff/3605691/](https://www.nbcmiami.com/news/local/ocala-17-year-old-convinced-kids-to-send-him-sex-abuse-material-on-roblox-sheriff/3605691/).

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

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



13
14 *Results from an account search for “earlbrianbradley.”*⁸¹

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

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

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24
25 ⁸¹ Hindenburg Research, *supra* note 1.

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

27 ⁸³ *Id.*

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

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

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

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

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

27 ⁸⁷ *Id.*

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

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

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

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

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

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

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

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

17 96. By limiting safety measures, Roblox not only increased its users but also reduced
18 the company’s safety expenses as a percentage of its revenue—a key metric for Wall Street, which
19 views trust and safety costs as detrimental to Roblox’s stock performance. Barclays, for example,

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

⁹⁰ Hindenburg Research, *supra* note 1.

⁹¹ *Id.*

⁹² *Id.*

⁹³ *Id.*

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

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

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

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

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

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

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

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

27 ⁹⁷ *Id.* (emphasis added).

28 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).

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

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

11 103. Roblox’s executives repeatedly emphasized their strategy of “aging up” the app to
12 attract older users. At the company’s inaugural conference with an investment bank in September
13 2021, Roblox’s CFO, Michael Guthrie, noted that Roblox had achieved “very good penetration of
14 nine to twelve year-olds,” and was focused on adding users over the age of 13.¹⁰⁵ One plan was to
15 “improve the search algorithms such that older users were finding older content,” or content
16 tailored to their age-related demographic.¹⁰⁶

17 104. And at its annual Developer Conference, CEO David Baszucki encouraged
18 developers to create experiences for older audiences, explaining that Roblox was rolling out
19 features designed to appeal to older users, including use of real names, screen capture and sharing
20 capabilities, video calls, and relaxed chat moderation.¹⁰⁷ These decisions, while framed as growth
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23 ¹⁰² Roblox, *What Is Roblox*,
24 <http://web.archive.org/web/20170227121323/https://www.roblox.com/> (archived Feb. 27, 2017).

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

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

27 ¹⁰⁵ Roblox at Goldman Sachs Communicopia Conference (Sep. 9, 2021),
28 <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>.

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

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

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

20 107. Not only did Roblox seek to increase adult users while knowing the risks that
21 strategy posed to children, but it also sought to encourage relationships between users. At Roblox’s
22 2023 Developers Conference, CEO Baszucki revealed Roblox’s strategy to facilitate “real-life
23 relationships” between users—*i.e.*, dating. While he deliberately avoided the word “dating,” he
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25 ¹⁰⁸ Q2 2023 Earnings Call (Aug. 9, 2023).

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

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

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

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

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

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

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

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

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

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

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

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

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

1 112. This practice contrasts sharply with other gaming products like Nintendo, which use
2 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
5 information or send any coercive or sexually suggestive messages.

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

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

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

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

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

¹¹⁹ *Id.*

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

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

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

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

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

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

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

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

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

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

25 ¹²³ Hindenburg Research, *supra* note 1.

26 ¹²⁴ 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>.

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

28 ¹²⁶ *Id.*

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

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

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

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

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

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

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

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

26 ¹³⁰ Roblox, *Safety Features: Chat, Privacy & Filtering*,
<https://web.archive.org/web/20240714130904/https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering> (archived Jul. 14, 2024).

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

28 ¹³² *Id.*

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

3 129. Beyond Roblox’s ineffective technology, the company also employs a woefully
4 inadequate number of human moderators to analyze and manage content on its platform. With only
5 about 3,000 moderators, Roblox pales in comparison to platforms like TikTok, which, despite
6 having only three times the number of users, employs more than ten times the number of
7 moderators at 40,000.¹³⁴ Roblox attempts to justify this disparity by claiming “[y]ou really can’t
8 judge the quality of these moderation systems by the number of people.”¹³⁵ But the reality tells a
9 different story. Roblox’s moderators, many of them overseas contractors, report being
10 overwhelmed by an unmanageable volume of child safety reports, making it impossible to address
11 all concerns effectively and leaving countless safety issues unresolved.¹³⁶

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

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

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

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

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

1 is—also reveals a disturbing trend: Roblox’s reports about suspected child sexual exploitation have
2 surged over the years, from 675 reports in 2019 to 13,316 reports in 2023.¹³⁸

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

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

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

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

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

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

10 b. “No. Roblox is not safe for children. The amount of NSFW [Not Safe for Work] I
11 see on this platform on a daily basis is unbelievable. I’m surprised COPPA hasn’t
12 taken any action.”¹⁴²

13 c. “I believe they need to automatically rate these games for older audiences, if not,
14 you know, removing them entirely. I could keep going on about this issue, but it’s
15 just beating a dead horse at this point.”¹⁴³

16 d. “Roblox got banned for bad moderation; Turkey banned it to ‘protect children,’ and
17 they are not wrong. The amount of visits from 10 of these games is, in summary,
18 100 million+. I don’t want to know how many of these children have seen nudity or
19 even developed a p*rn addiction. But that is a big problem with Roblox doing almost
20 nothing to prevent it.”¹⁴⁴

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

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

27 ¹⁴¹ *Id.*

28 ¹⁴² *Id.*

¹⁴³ *Id.*

¹⁴⁴ *Id.*

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

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

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

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

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

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23 ¹⁴⁵ Hindenburg Research, *supra* note 1.

24 ¹⁴⁶ *Roblox Tightens Messaging Rules for Under-13 Users Amid Abuse Concerns*, Reuters (Nov.
25 18, 2024), [https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-](https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/)
26 [amid-abuse-concerns-2024-11-18/](https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/).

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

¹⁴⁸ *Id.*

¹⁴⁹ *Id.*

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

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

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

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

27 ¹⁵¹ Parental Controls Overview, Roblox, [https://en.help.roblox.com/hc/en-](https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview)
28 [us/articles/30428310121620-Parental-Controls-Overview](https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview) (last accessed May 10, 2025).

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

141. Just as Roblox rolled out these changes, it simultaneously introduced a new “Parties” feature in an attempt to counteract any potential loss in user engagement.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

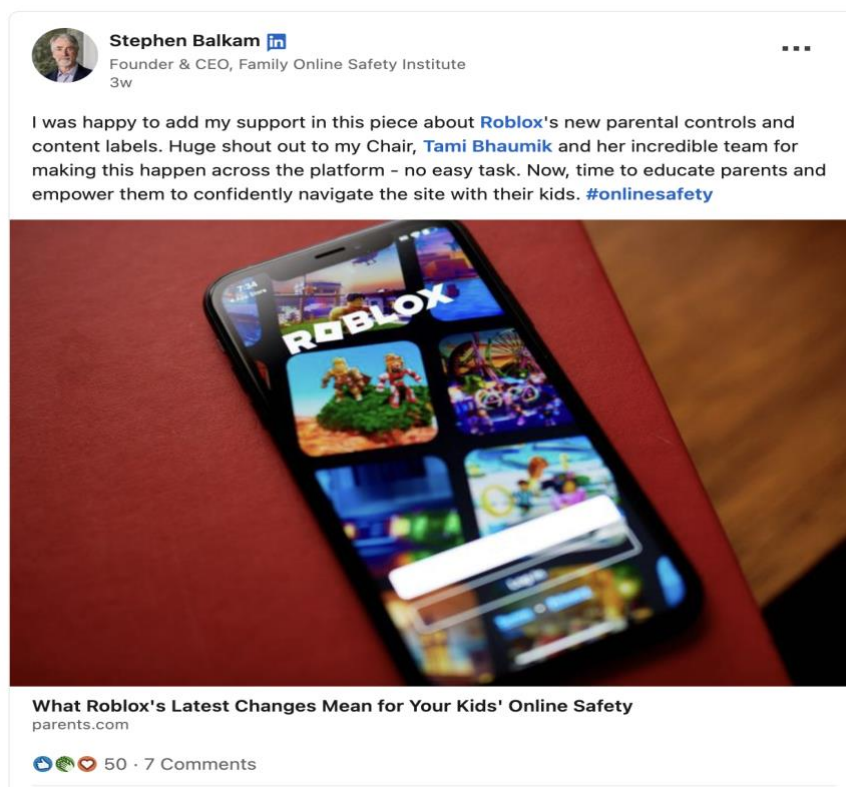
142. Roblox has also engaged in a deceptive public relations campaign using ostensibly independent online safety organizations to influence the narrative around these changes. For instance, Roblox has leveraged its ties to groups like the Family Online Safety Institute (“FOSI”). An online parenting magazine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

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.



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

20 143. Most recently, in April 2025, Roblox repeated this same deceptive playbook of
21 bragging about new safety features that, in reality, are glaringly deficient. This update included
22 three new features: first, allowing parents to block children from playing specific games; second,
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25 ¹⁵⁶ 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>.

26 ¹⁵⁷ *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>.

27 ¹⁵⁸ 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).
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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

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

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

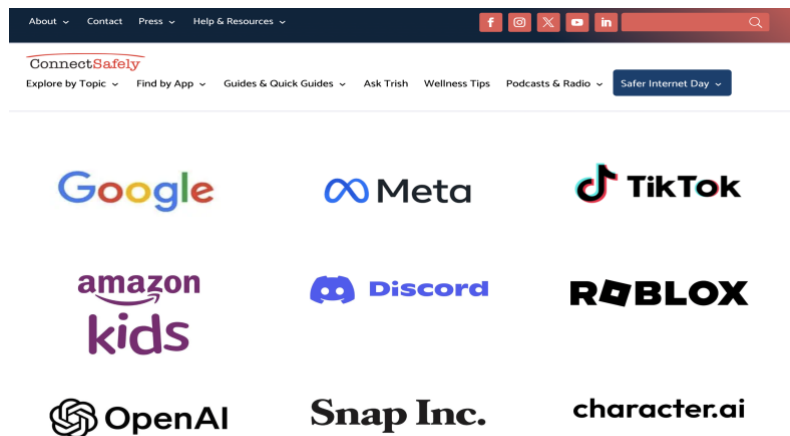
15 146. Roblox’s deceptive playbook would not be complete without a misleading public
16 relations campaign, where industry-funded safety “experts” praise Roblox’s safety update. For
17 example, Roblox’s press release announcing these updates quotes Larry Magid, the CEO of
18 ConnectSafely, as saying, “Roblox has consistently provided parents with tools that enable their
19 children to enjoy the platform, while helping protect them against online risks. These new friend-
20 and experience-blocking tools provide parents with even more ways to help ensure their children
21 are using it safely. Safety, fun, and adventure are not mutually exclusive.”¹⁶¹ What the press release
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26 ¹⁵⁹ Matt Kaufman, *New Tools for Parents to Personalize Their Child’s Experience on Roblox*,
27 ROBLOX (Apr. 2, 2025), <https://corp.roblox.com/newsroom/2025/04/new-parental-controls-on-roblox>.

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

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

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



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

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

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

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

27 ¹⁶³ 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>.

28 ¹⁶⁴ *Id.*

1 **V. PLAINTIFF-SPECIFIC ALLEGATIONS**

2 149. Plaintiff is currently a 10-year-old boy who was manipulated and groomed through
3 Defendant's dangerous apps by multiple predators. Plaintiff has suffered devastating and life-
4 altering psychological trauma. His life will never be the same.

5 150. Plaintiff was 7 years old when he first started playing on Roblox. Plaintiff's mother
6 believed that Roblox was safe for children because it was designed and marketed for kids. As
7 discussed above, Roblox spent considerable time and money publicly touting the safety and
8 security of the app, which created the public perception that Roblox had created a safe environment
9 for kids. Unbeknownst to Plaintiff's mother at the time, this was nothing more than a false façade
10 of safety.

11 151. In approximately 2024, when Plaintiff was only 9 years old, he met multiple men
12 on Roblox who posed as fellow children but were in fact adult predators. On Roblox, the predators
13 groomed Plaintiff, exploiting his age and vulnerability to build a false emotional connection with
14 him.

15 152. After capturing Plaintiff's trust, the predator intensified his grooming of Plaintiff,
16 and their interactions continued on Roblox. They sent Plaintiff graphic messages and sexually
17 explicit images and videos. Further, the predators continuously harassed Plaintiff—for months—
18 and ultimately convinced him to send the sexually explicit videos to Plaintiff's friends at school.
19 Throughout their interactions with Plaintiff on Roblox, the predators encouraged secretive
20 behavior, minimized the risks to Plaintiff, and ensured that Plaintiff would not reveal any of their
21 interactions to his parents.

22 153. Plaintiff has suffered profound harm from the grooming, manipulation, and
23 exploitation that he experienced on Defendant's app. He continues to suffer from severe mental
24 health issues, including difficulty trusting others, persistent anxiety, and he was eventually required
25 to change schools.

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

1 system of screening or age and identity verification, as well as effective parental controls, Plaintiff
2 never would have interacted with these predators and never would have suffered the harm that he
3 did. Plaintiff's life has been devastated as a direct result of Defendant's conduct.

4 **VI. CAUSES OF ACTION**

5 **FIRST CAUSE OF ACTION**

6 **FRAUDULENT CONCEALMENT AND MISREPRESENTATIONS**

7 **(By Plaintiff Against Defendant)**

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

9 156. This claim is brought against Defendant Roblox.

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

12 158. Defendant was under a duty to tell the public the truth and to disclose the defective
13 conditions of its app and that the app posed serious safety risks to child users. Instead of disclosing
14 the truth, Defendant engaged in a widespread public campaign to tout the safety of its app in the
15 media, and in the materials provided to potential users of the app, as described above.

16 159. Defendant made numerous false representations about the safety of its app, as
17 described above, which were specific and widespread. Plaintiff's mother and the public at large
18 relied on each Defendant's false representations in deciding to allow children to play on the app.

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

24 161. Defendant breached its duty to the public, users, and their parents by concealing and
25 failing to disclose the serious safety risks presented by its app. Even though Defendant knew of
26 those risks based on its internal reviews, external studies known to Defendant, and parent and police
27 reports made to Defendant, Defendant intentionally concealed those risks to not lose users and
28 revenue, and to induce parents to allow their children to use its app. Such risks were known only

1 to Defendant, and the public, users, and their parents, including Plaintiff's mother, could not have
2 discovered such serious safety risks.

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

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

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

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

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

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

22 168. As a direct and proximate result of Defendant's concealment of material information
23 and misrepresentations, Plaintiff sustained serious injuries and harm.

24 169. Defendant's concealment of material information and misrepresentations were a
25 substantial factor in causing harm to Plaintiff.

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

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

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

6 **SECOND CAUSE OF ACTION**

7 **NEGLIGENT MISREPRESENTATION**

8 **(By Plaintiff Against Defendant)**

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

10 173. This claim is brought against Defendant Roblox.

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

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

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

22 177. Defendant had no reasonable grounds for believing that its misrepresentations that
23 its app was safe for children to use were true.

24 178. As a direct and proximate result of Defendant's material omissions,
25 misrepresentations, and concealment of material information, Plaintiff's mother was not aware and
26 could not have been aware of the facts that Defendant misstated, and therefore justifiably and
27 reasonably believed that Defendant's app was safe for use.

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

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

181. 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.

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

THIRD CAUSE OF ACTION

NEGLIGENCE – GENERAL

(By Plaintiff Against Defendant)

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

184. This claim is brought against Defendant Roblox.

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

186. Defendant owed Plaintiff a duty to exercise reasonable care in the development, setup, management, maintenance, operation, marketing, advertising, promotion, supervision, and control of its app and not to create an unreasonable risk of harm from and in the use of its app (including an unreasonable risk of grooming, sexual abuse, and sexual exploitation, and other associated physical or mental injuries); to protect Plaintiff from unreasonable risk of injury from and in the use of its app; and not to invite, encourage, or facilitate youth, such as Plaintiff, to foreseeably engage in dangerous or risky behavior through, on, or as a reasonably foreseeable result

1 of using its app. These duties govern Defendant's own specific actions and are based on direct
2 actions Defendant took in developing its app and features.

3 187. In addition, Defendant owed a special relationship duty to Plaintiff to protect him
4 against harm caused by its app and employees or by other users. This special relationship duty is
5 based on the following:

- 6 a. As a business, Defendant owes a duty to protect customers against reasonably
7 foreseeable criminal acts of third parties and other dangers known to Defendant
8 on its app;
- 9 b. Plaintiff, as a minor, was vulnerable and dependent on Defendant for a safe
10 environment on their apps, and Defendant has superior ability and control to
11 provide that safety with respect to activities that they sponsor or control;
- 12 c. Plaintiff relied upon Defendant for protection against third-party misuse or
13 misconduct;
- 14 d. The special relationship Plaintiff had with Defendant substantially benefits
15 Defendant through profits and growth in users and user activity. Defendant
16 could not successfully operate without the growth in users and user activity
17 generated by children;
- 18 e. Defendant was far more to Plaintiff than a business. Defendant provided
19 Plaintiff with opportunities for social interaction and a discrete community of
20 other users. Plaintiff was dependent on Defendant to provide structure,
21 guidance, and a safe environment;
- 22 f. Defendant has superior control over its app environments and the ability to
23 protect its users. Defendant imposes a variety of rules and restrictions to
24 supposedly maintain a safe and orderly environment. Defendant employs
25 internal staff to enforce these rules and restrictions and can monitor and
26 discipline users when necessary. Defendant has the power to influence
27 Plaintiff's values, consciousness, relationships, and behaviors; and
28

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

5 188. Plaintiff was a foreseeable user of Defendant's app.

6 189. Defendant knew that minors such as Plaintiff would use its app.

7 190. Defendant invited, solicited, encouraged, or reasonably should have foreseen the
8 fact, extent, and manner of Plaintiff's use of its app.

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

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

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

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

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

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

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

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

10 199. Defendant breached its duties of care owed to Plaintiff through its affirmative
11 malfeasance, actions, business decisions, and policies in the development, set up, management,
12 maintenance, operation, marketing, advertising, promotion, supervision, and control of its
13 respective app. These breaches are based on Defendant's own actions in managing their own apps
14 made available to the public, independent of any actions taken by a third party. Those breaches
15 include but are not limited to:

16 a. Including features in its app that, as described above, are currently structured
17 and operated in a manner that unreasonably creates or increases the foreseeable
18 risk of grooming, sexual abuse, and sexual exploitation to youth, including
19 Plaintiff;

20 b. Including features in its app that, as described above, are currently structured
21 and operated in a manner that unreasonably creates or increases the foreseeable
22 risk of harm to the physical and mental health and well-being of youth users,
23 including Plaintiff, including but not limited to physical injury, damage to self-
24 worth, stigma and social isolation, reduced academic performance, increased
25 risky behavior, susceptibility to future sexual exploitation, attachment issues,
26 identity confusion, and profound mental health issues for young consumers,
27 including but not limited to depression, anxiety, suicidal ideation, self-harm,
28

1 post-traumatic stress disorder, insomnia, eating disorders, death, and other
2 harmful effects;

3 c. Maintaining unreasonably dangerous features in its app after notice that such
4 features, as structured and operated, posed a foreseeable risk of harm to the
5 physical and mental health and well-being of youth users;

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

9 e. Inviting children on its app and marketing to children when Defendant knew
10 that its app, as designed, was not safe for children.

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

16 a. Failing to implement effective parental controls;

17 b. Failing to screen users before allowing them on the app;

18 c. Failing to implement effective parental notifications, such as when a child
19 messages another user, particularly an adult user, or when a child interacts with
20 accounts that have been blocked by other users or suspended in the past;

21 d. Failing to require adult users to provide a phone number when signing up for an
22 account;

23 e. Failing to implement pop-up safety notices within chats and games to warn users
24 about inappropriate behavior;

25 f. Failing to ban IP and MAC addresses of accounts associated with known
26 abusers;

27 g. Failing to set default safety settings to the most protective options;

28 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 its app;
- l. Failing to implement effective protocols to verify ages and identity of all users;
- m. Failing to place reasonable age restrictions on its app;
- n. Failing to separate adults from children on the apps by, for example, creating separate apps for children;
- o. Failing to adequately fund its trust and safety programs; and
- p. Others as set forth herein.

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

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

203. 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, and profound mental health issues such as depression, anxiety, and other harmful effects.

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

205. Plaintiff was injured from using Defendant's defective app through no fault of his own. The fact that Plaintiff was injured by using Defendant's app means that Defendant is responsible for the injuries caused by Defendant's app and the burden shifts to Defendant to

1 identify alternative causes of the alleged injuries and apportion responsibility for the alleged
2 injuries.

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

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

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

13 **FOURTH CAUSE OF ACTION**

14 **NEGLIGENCE – FAILURE TO WARN**

15 **(By Plaintiff Against Defendant)**

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

17 210. This claim is brought against Defendant Roblox.

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

21 212. Plaintiff was a foreseeable user of Defendant's app.

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

25 214. Defendant knew, or by the exercise of reasonable care, should have known, that
26 ordinary minor users, such as Plaintiff, would not have realized the potential risks and dangers of
27 its app, including a risk of grooming, sexual abuse, and sexual exploitation, which can lead to a
28 cascade of harms. Those harms include but are not limited to physical injury, damage to self-worth,

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

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

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

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

16 218. In addition, as described above, Defendant owed a special relationship duty to
17 Plaintiff to protect him against harm caused by its app and employees or by other users.

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

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

- 27 a. Defendant fails to require that children have parental approval before signing up
28 for an account;

- b. Defendant fails to screen users before allowing them on their apps;
- c. New users of Defendant's app can identify themselves as minors, begin to use the app, and do so indefinitely, without ever receiving a safety warning, and without ever having to provide information so that Defendant can warn the users' parents or guardians;
- d. Defendant's app's default safety settings allow adults and other strangers' accounts to find, "friend," and communicate with children's accounts;
- e. Defendant's parental control settings allowed children to modify their own parental control settings;
- f. Defendant's platforms recommend that adult users and other strangers "friend" and contact child accounts;
- g. Defendant fails to block the IP and MAC addresses of known abusers;
- h. Adult predators use Defendant's to target children for sexual exploitation, sextortion, and CSAM;
- i. Defendant's app enables and increases risk of exposure to predators and can result in grooming, sexual abuse, and sexual exploitation, as well as their resultant physical and mental injuries;
- j. Sexual predators use Robux to coerce children into sending them nude photos or engaging in other types of sexually explicit behavior;
- k. Usage of Defendant's app can increase risky and uninhibited behavior in children, making them easier targets to adult predators for sexual exploitation, sextortion, and CSAM;
- l. Usage of Defendant's app can normalize abuse and pornography, leading children to abuse other children either contemporaneously or later when the children are older;
- m. The likelihood and severity of harm is greater for children;
- n. The likelihood and intensity of these harmful effects is exacerbated by the interaction of the app's features with one another;

- o. Defendant fails to verify ages, allowing adult predators to pose as children on Defendant's app;
- p. Defendant's failure to verify ages allows children to bypass parental controls, safety features, and default settings; and
- q. Others as set forth herein.

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

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

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

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

225. Plaintiff was injured from using Defendant's defective app through no fault of his own. The fact that Plaintiff was injured by using Defendant's app means that Defendant is responsible for the injuries caused Defendant's app and the burden shifts to Defendants to identify alternative causes of the alleged injuries and apportion responsibility for the alleged injuries.

226. 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 Defendant's app.

227. The conduct of 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 their customers, and warrants an award of punitive damages in an amount sufficient to punish Defendant and deter others from like conduct.

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

4 **FIFTH CAUSE OF ACTION**

5 **NEGLIGENCE – UNREASONABLE DESIGN**

6 **(By Plaintiff Against Defendant)**

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

8 230. This claim is brought against Defendant Roblox.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

10 g. Preventing strangers from sending Robux to child accounts, and preventing
11 children from sending Robux to strangers' accounts;

12 h. Banning IP and MAC addresses of accounts associated with known abusers;

13 i. Controlled chat option;

14 j. Providing a transcript of a child's communications to the parent;

15 k. Implementing reporting protocols to allow users or visitors of Defendants' apps
16 to report CSAM and adult predator accounts specifically without the need to
17 create or log in to the apps prior to reporting;

18 l. Robust age and identity verification;

19 m. Reasonable age restrictions;

20 n. Separating adults from children by, for example, creating separate apps for
21 children; and

22 o. Others as set forth herein.

23 244. Alternative designs that would reduce the dangerous features of Defendant's app
24 were available, would have served effectively the same purpose as Defendant's defectively
25 designed app, and would have reduced the gravity and severity of danger Defendant's app posed
26 minor Plaintiff.

27 245. A reasonable company under the same or similar circumstances as Defendant would
28 have designed a safer app.

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

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

248. Plaintiff was injured from using Defendants' defective app through no fault of his own. The fact that Plaintiff was injured by using Defendant's app means that Defendant is responsible for the injuries caused by Defendant's app and the burden shifts to Defendant to identify alternative causes of the alleged injuries and apportion responsibility for the alleged injuries.

249. 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 Defendant's app.

250. The conduct of 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 Defendant and deter others from like conduct.

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

SIXTH CAUSE OF ACTION

NEGLIGENT UNDERTAKING

(By Plaintiff Against Defendant)

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

253. This claim is brought against Defendant Roblox.

254. Defendant rendered parental control services and account safety services to Plaintiff's parents.

1 255. Defendant made numerous statements, as outlined above, claiming in substance that
2 their parental controls and account safety services were highly effective at protecting users from
3 the type of harm Plaintiff suffered.

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

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

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

11 259. Imposing a duty on Defendant would benefit the community at large.

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

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

17 262. Plaintiff's mother relied on Defendant exercising reasonable care in undertaking to
18 render parental control and account safety services.

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

22 264. Defendant failed to exercise reasonable care in rendering these parental control and
23 account safety services.

24 265. Defendant's failure to exercise reasonable care increased the risk of, and was a
25 substantial factor in causing harm to Plaintiff.

26 266. Plaintiff was harmed by his mother's reliance on Defendant to provide effective
27 parental control and account safety services.

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

268. Plaintiff was injured from using Defendant's defective app through no fault of his own. The fact that Plaintiff was injured by using Defendant's app means that Defendant is responsible for the injuries caused by any one of Defendants' apps and the burden shifts to Defendant to identify alternative causes of the alleged injuries and apportion responsibility for the alleged injuries.

269. 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 Defendant's app.

270. The conduct of 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 their conduct, including to the health, safety, and welfare of its customers, and warrants an award of punitive damages.

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

SEVENTH CAUSE OF ACTION

STRICT LIABILITY – DESIGN DEFECT

(By Plaintiff Against Defendant)

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

273. This claim is brought against Defendant Roblox.

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

275. These products were designed, manufactured, maintained, controlled, and distributed from the California headquarters of Defendant.

1 276. Defendant's product was designed and intended to be a gaming and/or
2 communication product. The software and architecture of each product is the same for every user
3 that logs on or signs up for an account. These products are uniformly defective and pose the same
4 danger to each minor user.

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

7 278. Defendant's product is marketed and advertised to the public for the personal use of
8 the end-user/consumer.

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

11 280. The defects in the design of Defendant's product existed prior to the release of these
12 products to Plaintiff and the public, and there was no substantial change to Defendant's products
13 between the time of their upload by each Defendant to public or retail channels (*e.g.*, the App Store
14 or Google Play) and the time of their distribution to Plaintiff via download or URL access.

15 281. Plaintiff used these products as intended, and Defendant knew or, by the exercise of
16 reasonable care, should have known that Plaintiff would use these products without inspection for
17 its dangerous nature.

18 282. Defendant defectively designed its product to appeal to adult predators by making
19 it easy to find children and enabled their contact, grooming, sexual exploitation, and sexual abuse
20 of children, including Plaintiff.

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

24 284. Defendant's product is defective in design and poses a substantial likelihood of harm
25 for the reasons set forth herein, because the products fail to meet the safety expectations of ordinary
26 consumers when used in an intended or reasonably foreseeable manner, and because the products
27 are less safe than an ordinary consumer would expect when used in such a manner. Children and
28 teenagers are among the ordinary consumers of Defendant's products. Indeed, Defendant markets,

1 promotes, and advertises its respective product to pre-teen and young consumers. Pre-teen and
2 young consumers, and their parents and guardians, do not expect Defendant's products to expose
3 them to predators when the products are used in their intended manner by their intended audience.
4 They do not expect the features embedded by Defendant in their products to make it easy for child
5 predators to sign-up for accounts and find children, groom children, and sexually exploit children.
6 They do not expect Defendant's revenue and profits to be directly tied to predators' extortion of
7 children.

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

15 286. The risks inherent in the design of Defendant's product significantly outweigh any
16 benefits of such design.

17 287. Defendant could have utilized cost-effective, reasonably feasible alternative
18 designs, including changes to the problematic features described above, to minimize the harms
19 described herein, including, but not limited to:

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

1 between adult users and a child with the parent's explicit permission to message
2 the adult user;

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

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

23 289. Plaintiff used Defendant's respective products as intended or in reasonably
24 foreseeable ways.

25 290. The physical, emotional, and economic injuries of Plaintiff were reasonably
26 foreseeable to Defendant at the time of its products' development, design, advertising, marketing,
27 promotion, and distribution.
28

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

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

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

12 294. As a direct and proximate result of Defendant's product's defective design, Plaintiff
13 suffered serious and dangerous injuries.

14 295. As a direct and proximate result of Defendant's product's defective design, Plaintiff
15 requires and/or will require more healthcare and services and did incur medical, health, incidental,
16 and related expenses.

17 296. Plaintiff was injured from using Defendant's defective products through no fault of
18 his own. The fact that Plaintiff was injured by using Defendant's products means that Defendant is
19 responsible for the injuries caused by any one of Defendant's products and the burden shifts to
20 Defendant to identify alternative causes of the alleged injuries and apportion responsibility for the
21 alleged injuries.

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

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

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

4 **EIGHTH CAUSE OF ACTION**

5 **STRICT LIABILITY – FAILURE TO WARN**

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

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

8 301. This claim is brought against Defendant Roblox.

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

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

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

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

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

1 307. Defendant was in the best position to know the dangers its products posed to
2 consumers, including Plaintiff, as they had superior knowledge of the risks and dangers posed by
3 their products and had exclusive knowledge of these risks at the time of development, design,
4 marketing, promotion, advertising and distribution. Defendant had exclusive control of its products
5 at all times relevant to this litigation.

6 308. Defendant's respective product is dangerous, to an extent beyond that contemplated
7 by the ordinary user who used Defendant's products, because they enable predators to find, groom,
8 abuse, and exploit children.

9 309. Defendant knew or, by the exercise of reasonable care, should have known that its
10 respective product posed risks of harm to youth considering its own internal data and knowledge
11 regarding its product at the time of development, design, marketing, promotion, advertising, and
12 distribution.

13 310. These risks were known and knowable in light of Defendant's own internal data and
14 knowledge regarding their products at the time of the products' development, design, marketing,
15 promotion, advertising, and distribution to Plaintiff.

16 311. Defendant's products are defective and unreasonably dangerous because, among
17 other reasons described herein, each Defendant failed to exercise reasonable care to inform users
18 that, among other things:

- 19 a. Sexual predators use Defendant's products to find, contact, groom and abuse
20 children with alarming frequency;
- 21 b. Sexual predators use Defendant's products to solicit, produce, and distribute
22 CSAM with alarming frequency;
- 23 c. Sexual predators target young children for CSAM on Defendant's products with
24 alarming frequency;
- 25 d. Sexual predators use Robux to coerce children into sending them nude photos
26 or engaging in other types of sexually explicit behavior;
- 27 e. Defendant's products are designed in a way that enables and increases risk of
28 exposure to predators and resulting sexual exploitation;

- f. Defendant's products cause grooming, sexual abuse, and sexual exploitation, and its resultant physical and mental injuries;
- g. Use of Defendant's products can increase risky and uninhibited behavior in children, making them easier targets to adult predators for sexual exploitation, sextortion, and CSAM;
- h. Use of Defendant's products can normalize abuse and pornography, leading children to abuse other children either contemporaneously or later when the children are older;
- i. New users of Defendant's product can identify themselves as minors, begin to use the product, and do so indefinitely, without ever receiving a safety warning, and without ever having to provide information so that Defendants can warn the users' parents or guardians;
- j. Defendant's failure to verify ages allows children to bypass parental controls, safety features, and default settings;
- k. The likelihood and severity of harms is greater for children;
- l. The likelihood and intensity of these harmful effects is exacerbated by the interaction of each product's features with one another; and
- m. Others as set forth herein.

312. Plaintiff was a foreseeable user of Defendant's product.

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

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

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

316. Plaintiff was injured from using Defendants' defective products through no fault of his own. The fact that Plaintiff was injured by using Defendant's products means that Defendant is

1 responsible for the injuries caused by Defendant's products and the burden shifts to Defendant to
2 identify alternative causes of the alleged injuries and apportion responsibility for the alleged
3 injuries.

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

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

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

14 **VII. PRAYER FOR RELIEF**

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

- 17 1. Past, present, and future general damages, the exact amount of which has yet to be
18 ascertained, in an amount which will confirm to proof at time of trial, to compensate
19 Plaintiff for injuries sustained as a result of the use of Defendant's products,
20 including but not limited to physical pain and suffering, mental anguish, loss of
21 enjoyment of life, emotional distress, and expenses for medical treatments;
- 22 2. Past, present, and future economic and special damages, according to proof at the
23 time of trial;
- 24 3. Impaired earning capacity according to proof at the time of trial;
- 25 4. Medical expenses, past and future, according to proof at the time of trial;
- 26 5. Punitive or exemplary damages according to proof at the time of trial;
- 27 6. Attorneys' fees;
- 28 7. For costs of suit incurred herein;

- 1 8. Pre-judgment and post-judgment interest as provided by law;
2 9. For nonmonetary injunctive relief; and
3 10. For such other and further relief as the Court may deem just and proper.

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

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

7 Date: July XX, 2025

Respectfully submitted,

8 **BATLE LAW, PLLC**

10 By: /s/
11 R. Lee Page
12 600 Cleveland Street, Suite 250
13 Clearwater, FL 33755
14 Telephone: (866) 922-8853

15 Matthew A. Dolman*
16 matt@dolmanlaw.com
17 R. Stanley Gipe*
18 stan.gipe@dolmanlaw.com
19 Sara D. Beller*
20 sara.beller@dolmanlaw.com
21 **DOLMAN LAW GROUP**
22 800 N. Belcher Rd.
23 Clearwater, FL 33765
24 Telephone: (727) 451-6900
25 Facsimile: (727) 451-6907

26 *Attorneys for Plaintiff John Doe and His Next*
27 *Friend Jane Doe*

28 **Pro Hac Vice motions forthcoming*