**NO FEE DUE**
**GOV'T CODE § 6103**

DAWYN R. HARRISON, County Counsel
SCOTT KUHN, Assistant County Counsel
(SBN 190517) • skuhn@counsel.lacounty.gov
ANDREA ROSS, Principal Deputy County Counsel
(SBN 179398) • aross@counsel.lacounty.gov
CANDICE ROOSJEN, Senior Deputy County Counsel
(SBN 260310) • croosjen@counsel.lacounty.gov
JENNIFER MALONE, Senior Deputy County Counsel
(SBN 151421) • jmalone@counsel.lacounty.gov
IDA ANBARIAN, Deputy County Counsel
(SBN 348688) • ianbarian@counsel.lacounty.gov
OFFICE OF THE COUNTY COUNSEL
648 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012-2713
Telephone: (213) 808-8796; Fax (213) 680-2165

Attorneys for THE PEOPLE OF THE STATE OF CALIFORNIA, BY AND THROUGH THE COUNTY COUNSEL OF THE COUNTY OF LOS ANGELES

(Additional Counsel Listed on Signature Page)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

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| THE PEOPLE OF THE STATE OF CALIFORNIA, acting by and through Los Angeles County Counsel Dawyn R. Harrison,<br><br>Plaintiff,<br><br>v.<br><br>ROBLOX CORPORATION; and DOES 1-50, inclusive,<br><br>Defendant. | Case No.:<br><br>**COMPLAINT FOR PUBLIC NUISANCE, VIOLATIONS OF CALIFORNIA FALSE ADVERTISING LAW, CALIFORNIA UNFAIR COMPETITION LAW; DEMAND FOR INJUNCTIVE RELIEF, RESTITUTION, ABATEMENT, AND CIVIL PENALTIES** |

The People of the State of California, acting by and through the Los Angeles County Counsel Dawyn R. Harrison ("the People") bring this action against Roblox Corporation ("Roblox" or "Defendant"), and allege as follows:

## I. INTRODUCTION

1. Roblox is "an immersive gaming and creation platform that offers people millions of ways to be together, inviting its community to explore, create, and share endless unique experiences."[1] It is one of the most popular online gaming platforms in history. In the third quarter of 2025, approximately 151.5 million daily active users spent a collective 39.6 billion hours on the Roblox platform. This activity generated $1.36 billion for Roblox during that quarter, which was nearly a 50 percent increase in revenue from the same period in 2024.

2. Roblox deliberately positions itself as a platform for children. By September 2020, roughly 31.1 million people, more than half of them under 13, were on Roblox daily,[2] making it the world's biggest on-line gaming site for kids. The company itself acknowledges that "Roblox was initially created to serve the younger demographic, and today we are the largest dedicated gaming platform for users aged 13 and under (U13)."[3] With the majority of its daily active users under the age of 18, Roblox has cultivated an image of being a safe platform for children. Roblox repeatedly assures these users, their parents, and the public that its top priority is protecting young players. But its assurances are false, misleading, and unlawful because they are contradicted by Roblox's own design choices, safety architecture, and monetization practices, which have foreseeably and repeatedly exposed minors to harm. Indeed, Roblox has built its brand, expanded its userbase, and increased its revenue by marketing itself as safe and appropriate for children, while failing to implement meaningful safeguards that would materially reduce foreseeable harm.

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[1] Roblox, *What is Roblox*, https://corp.roblox.com/what-is-roblox (last visited January 17, 2026).
[2] Roblox Corp., SEC filings as of November 19, 2020, https://www.sec.gov/Archives/edgar/data/1315098/000119312520298230/d87104ds1.htm (last visited January 17, 2026).
[3] Roblox Corp., Shareholder Letter SEC filings as of February 5, 2026, https://www.sec.gov/Archives/edgar/data/1315098/000131509826000009/ex991-q42025shareholder.htm (last visited February 10, 2026).

3. Roblox has created a massive, largely unsupervised online world where adults and children mingle with little functional oversight. Roblox's own platform architecture and product design choices, including how it structures account creation and how users can locate and contact one another, create foreseeable pathways for adults to access and target minors at scale. Beneath the bright animation and cheerful branding lies an environment in which child predators can readily locate, contact, and interact with minors through Roblox-enabled features and defaults, and where age-inappropriate sexual content and sexually themed interactions and experiences can be assessed and disseminated through Roblox's functionality and tools, leaving minors to navigate dangers they do not and cannot understand. Roblox invites children into its fantastic world with the promise of creativity and play, while failing to erect even rudimentary guardrails against the dangers it knows, and has long known, exist.

4. This action is based on Roblox's own conduct: its design choices, safety failures, and false and misleading representations. Roblox has built an ecosystem that all but hands predators a roadmap to accessing young users: the platform's architecture lets adults target minors with ease, masquerade as fellow children, strike up conversations, and maneuver themselves into a position of influence over those children, grooming them through repeated interactions.

5. Roblox portrays its platform as a safe and appropriate place for children to play. In reality, and as Roblox well knows, the design of its platform makes children easy prey for pedophiles. Roblox has failed to implement reasonable and readily available safety measures, including age verification, default communications restrictions, meaningful parental controls, effective reporting mechanisms, and escalation systems, to materially reduce foreseeable harm. These fixes are obvious, easy, and long overdue. Yet for years, Roblox has refused to invest in basic safety features and has done the exact opposite: it has allowed children to create accounts with no age verification or parental involvement, permitted high-risk interactions to occur through product defaults that enable minors to be located, contacted, and groomed, and then monetized the very interactions that put those children at risk. Roblox's business model depends on maximizing child engagement and encouraging transactions through its virtual economy, creating incentives to prioritize user growth and revenue over meaningful child-safety protections.

6. These failures are intentional, preventable, and unconscionable. The reason for Roblox's unlawful conduct is simple: Roblox prioritizes profit and user growth 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."[4]

7. For years, Roblox has knowingly maintained platform conditions and design features that foreseeably allow the systemic sexual exploitation and abuse of children across the United States, including in the County of Los Angeles ("County"). In the County alone, hundreds of thousands of children under the age of 18 use Roblox. As a result, the County is on the front lines of combatting the consequences of Roblox's unlawful conduct. The child exploitation crisis enabled by Roblox's unsafe platform conditions and failures to implement reasonable protections affects all aspects of child welfare, community safety, and the ability of children to grow and develop free from predatory abuse. The County has been forced to expend, divert, and increase its limited resources to address rising rates of child sexual exploitation, trafficking, abuse, and mental health trauma foreseeably linked to Roblox's design, marketing, and operational choices. By taking actions that increase the costs of law enforcement, child protective services, victim services, mental health counseling, and other public services, Roblox has diverted taxpayer dollars away from other critical public programs and services.

8. Only within the last year, after its legal troubles began to mount, has Roblox started to implement policy changes. But those changes are far too little, far too late, and ineffective. Roblox's deliberate failure to implement effective safety measures to protect child users from well- documented predatory threats, along with its ongoing failure to warn parents and children of the foreseeable dangers posed by its platform, has caused the widespread sexual exploitation of minors and inflicted severe, lasting harm upon the children of California.

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

Critically, Roblox's belated changes underscore that additional safeguards were feasible, readily available, and long overdue.

9. The People bring this action to hold Roblox accountable for its unlawful conduct. The People seek injunctive relief, including relief requiring Roblox to implement meaningful safeguards that materially reduce foreseeable harm to minors, restitution, disgorgement, civil penalties, abatement of the public nuisance, and all other remedies authorized under California law.

## II. PARTIES

### A. Plaintiff

10. Plaintiff, the People of the State of California, acting by and through the Los Angeles County Counsel Dawyn R. Harrison, bring this action pursuant to statutory authority provided under the Unfair Competition Law ("UCL"), Business & Professions Code ("Bus. & Prof. Code") § 17200, et seq.; the False Advertising Law ("FAL"), Bus. & Prof. Code § 17500, et seq.; and other applicable California law authorizing public enforcement, injunctive relief, restitution, and civil penalties. Consumers in the County and throughout California were harmed, and continue to be harmed, by Roblox's unlawful and deceptive conduct.

11. The People also bring this action to abate a public nuisance in the County pursuant to California Code of Civil Procedure ("Code of Civ. Proc.") § 731.

12. The County is located in Southern California and is the most populous county in the United States, with a population of approximately 10 million.

### B. Defendants

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

14. The true names or capacities, whether individual, corporate, or otherwise, of Defendants Does 1 through 50, inclusive, are unknown to Plaintiff who is therefore ignorant of their true names and sues said Defendants by such fictitious names. Plaintiff believes and alleges

that each of the Defendants designated herein by fictitious names is in some manner legally responsible for the events and happenings herein referred to and caused damages proximately and foreseeably to Plaintiff as alleged herein.

## III. JURISDICTION AND VENUE

15. This Court has personal jurisdiction over Roblox because its principal place of business is in California, and because it has contacts with California that are so continuous and systematic that it is essentially at home in this State.

16. This Court has subject matter jurisdiction over the People's claims for restitution, civil penalties, injunctive relief, and other equitable relief under the UCL, the FAL, and California Civil Code ("Cal. Civ. Code") § 3345; and over the People's claim under California Public Nuisance law (Cal. Civ. Code. §§ 3479, 3480). Roblox has substantially contributed to the creation of a public nuisance in the County, and the County Counsel has the right and authority to prosecute this case on behalf of the People.

17. The People's claims arise from Roblox's own conduct, including its design choices, platform and product architecture, and deceptive practices, and seek forward-looking abatement and injunctive relief.

18. Venue is proper in this judicial district, pursuant to Code of Civ. Proc. §§ 395 and 395.5, because Roblox conducts business in this County and the unlawful conduct and public harm alleged herein occurred in and impacted the County.

## IV. FACTUAL ALLEGATIONS

### A. Roblox Is a Massive Gaming Platform Designed for and Marketed to Kids

#### 1. *What Roblox is and how it works*

19. Launched in 2006, Roblox is an online gaming platform that allows users to play a myriad of games, which the company refers to as "experiences." Free to download and available on gaming consoles, computers, tablets, and cellular devices, the platform hosts more than 40 million experiences. In 2025, Roblox users spent a collective 124 billion hours on the platform,[5]

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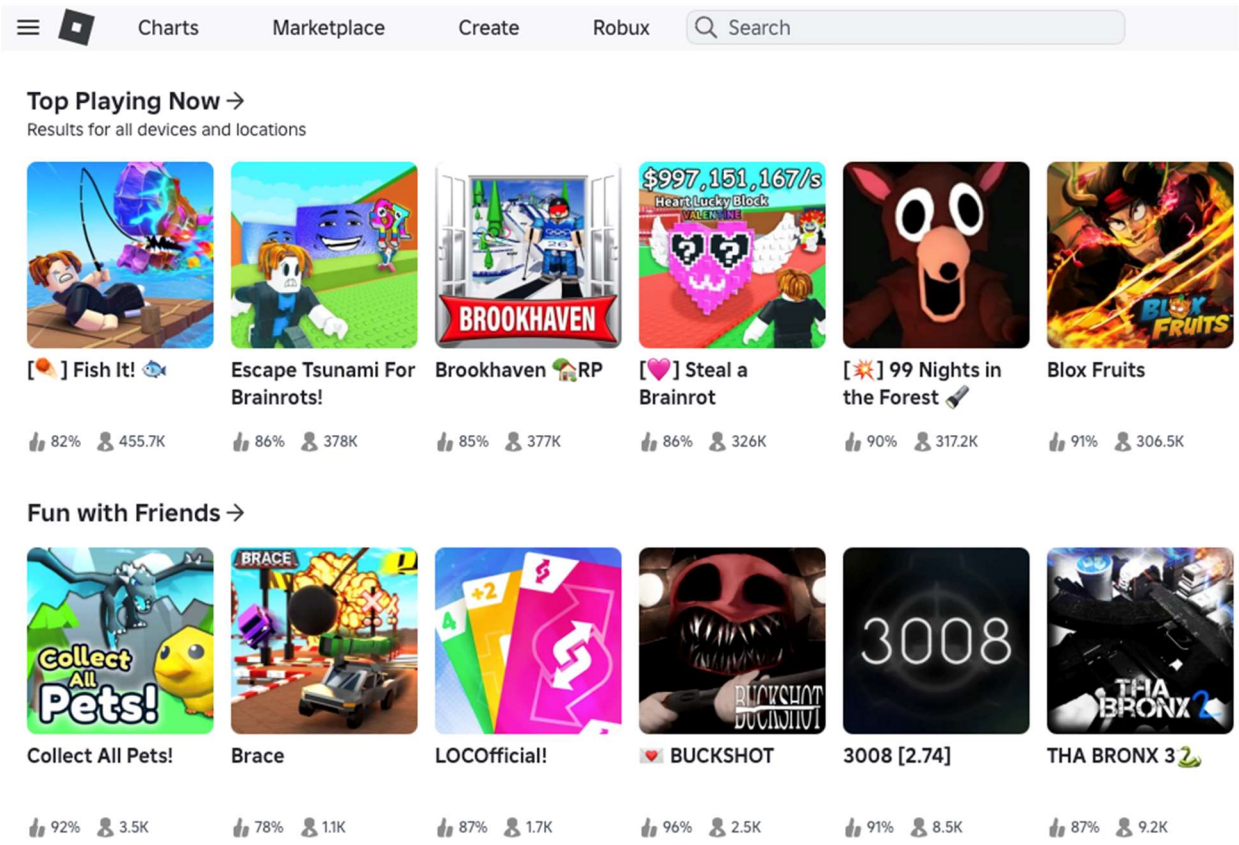
[5] Roblox, Shareholder Letter, *supra* note 3.

with approximately 151.5 million daily active users in the third quarter alone.[6]

20. Users navigate the platform by browsing or searching for experiences. The platform recommends experiences to players based on various factors, including the age associated with their account. Roblox's recommendation systems and design shape what content and experiences players are directed to, and influence how players, including minors, interact with the platform.




*Examples of trending experiences available on Roblox.*

21. Roblox serves two types of consumers: users or players (who access and play experiences) and creators (who develop and publish experiences). Most experiences on Roblox are created not by Roblox itself but by individual creator consumers (often other Roblox players) or third-party companies. These creators develop their own games using coding tools and infrastructure designed and maintained by Roblox, then publish these games on Roblox's platform

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[6] Roblox, Shareholder Letter, Q3 2025, available at https://s27.q4cdn.com/984876518/files/doc_financials/2025/q3/Q3-2025-Shareholder-Letter.pdf (last visited January 17, 2026).

for player consumers to access. Any consumer can easily upload their content to the platform.

22. The platform's core mechanics center on social interaction. Roblox is designed to be an interactive experience, allowing and encouraging users to communicate with each other. Gameplay interactions, user hubs, friend requests, user-to-user connections, direct messaging, and voice chat are built-in features that promote social interactions between users, including between adults and minors. Roblox's co-founder and CEO David Baszucki has explained that his vision is for Roblox to bring about "the next phase of human interaction," which he also has described as "a new category of human coexperience."[7] Roblox has similarly explained that it "operates a human co-experience platform . . . where users interact with each other to explore and develop immersive, user-generated, 3D experiences."[8]

23. Roblox has complete control over key platform functions and product defaults that govern how players interact. Roblox decides whether to issue content warnings associated with an experience, whether to require age verification and age restrictions for accessing a particular experience, what default communications settings apply to different age groups, and whether and how to deploy and enforce meaningful safeguards, including reporting, escalation, and enforcement mechanisms when users raise safety concerns.

**2. *Creating an account on Roblox***

24. The first step to playing Roblox is to create an account. Doing so is extremely easy: all an individual has to do is visit www.roblox.com or download the app to "SIGN UP AND START HAVING FUN!" Users must provide only a birthdate, username, and password to start playing. A user need only be at least five-years-old to create an account, and Roblox does not require users to verify their age upon sign-up.

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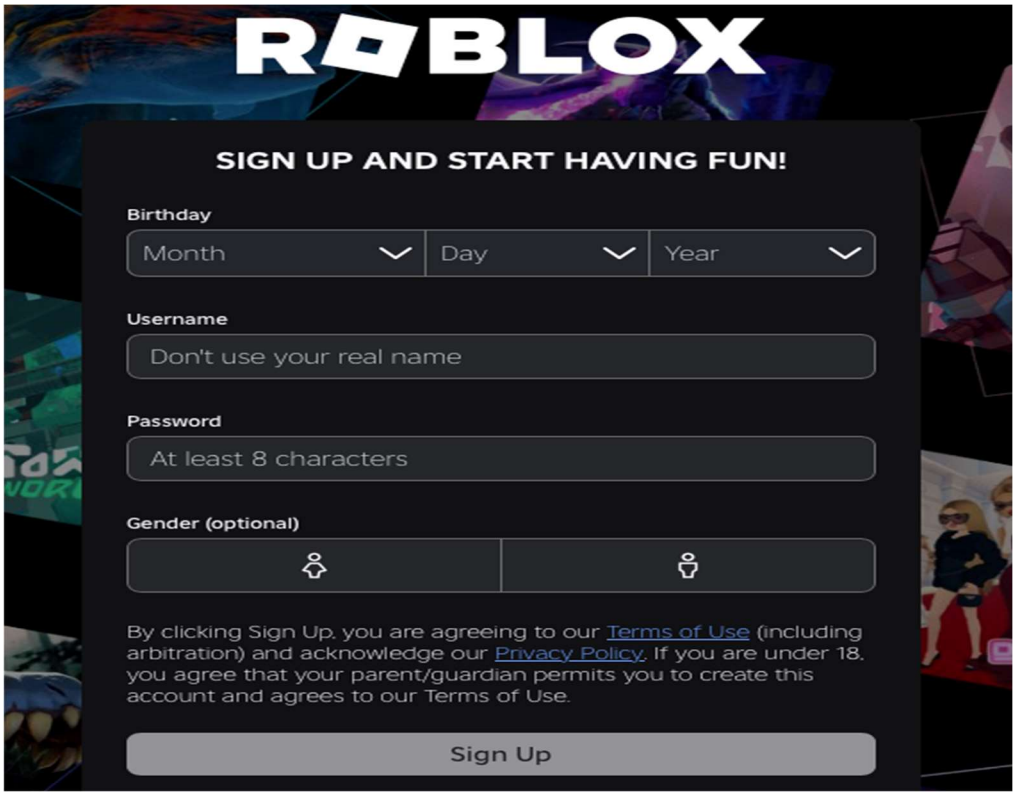
[7] David Baszucki, Co-founder and CEO of Roblox, *The CEO of Roblox on Scaling Community-Sourced Innovation*, Har. Bus. Rev., The Magazine, (Mar-Apr 2022) https://hbr.org/2022/03/the-ceo-of-roblox-on-scaling-community-sourced-innovation.

[8] Roblox Corp., Quarterly Report (Form 10-Q) (Mar. 13, 2021).




*Example of Roblox Sign-up Screen (as of January 17, 2026)*

25. Although the Roblox sign-up screen states that "[i]f you are under 18, you agree that your parent/guardian permits you to create this account and agrees to our Terms of Use," Roblox does nothing to confirm or document that parental permission has been given, no matter how young a child is. Nor does Roblox require a parent to confirm the age given when a child signs up to use Roblox. Roblox's account-creation defaults therefore invite minors onto the platform without parental involvement, verification, or meaningful safeguards.

26. After creating an account, all users are assigned a default player avatar—a cartoonish character that represents the individual user within certain games. Roblox's use of avatars and usernames obscures user identity and age, making it difficult for minors, parents, and caregivers to assess who they are interacting with on the platform.

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*Example default avatar on Roblox.*

27. Until November 2024, Roblox configured its platform's default settings to allow any user to send friend requests and direct messages to any other user, regardless of the ages associated with their accounts. Because of these default communication settings, adult strangers could "friend" and chat with a child of any age via direct (*i.e.*, private) message. Similarly, under Roblox's default communication settings, adult users could send direct messages and chat with a child of any age within a Roblox experience (in-game chat) without being connected as "friends."

28. In November 2024, Roblox changed its default settings for accounts registered with birthdates indicating the user is under 13-years-old. Under the updated defaults, accounts with 13+ birthdates could not send direct messages to accounts with under-13 birthdates unless those accounts were already connected as friends. However, accounts with birthdates indicating 13 years or older could still send friend requests and direct messages to other accounts with 13+ birthdates, so children 13 and over were still vulnerable to receiving friend requests, or direct messages within Roblox experiences from adult strangers. And the platform continued to rely on self-reported birthdates to determine which communication settings applied to each account. By relying on self-reported birthdates and allowing minors to access adult-level communication settings through a single falsified birthdate, Roblox's design and default settings created a foreseeable and preventable pathway for adult-minor contact. Further, nothing prevented adults from entering fake birthdates and posing as children in their attempts to friend or otherwise

communicate with minor users.

29. Until recently, Roblox did not require age verification at any point in the account creation or usage process. In January 2026, following a wave of litigation concerning child safety on its platform, Roblox rolled out age-verification requirements tied to access to certain social features. But Roblox still does not require age verification at account creation, continuing to rely on users' self-reported birthdates rather than independently verifying age at sign up.

**3. *Roblox is designed for and marketed to children***

30. Roblox designed and marketed its app specifically for children.

31. Roblox has marketed its app not only as the "#1 gaming site for kids and teens"[9] but also as an educational experience for young users. Roblox claims that it provides "new gateways into learning"—from "chemistry to physics to robotics and more, Roblox experiences bring concepts to life in ways that immerse learners and motivate exploration, play, and deep thinking."[10] These offerings, according to Roblox, include "high-quality, standards-aligned, immersive educational experiences designed by curriculum experts."[11] Roblox's marketing thus emphasizes youth engagement and trustworthiness, including messaging directed to parents and educators.

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[9] Roblox, *What Is Roblox*, http://web.archive.org/web/20170227121323/https://www.roblox.com/ (archived Feb. 27, 2017).

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

[11] *Id.*

*Roblox webpage – "A New Era of Engaged Learning"*

32. Roblox has cultivated a massive child userbase. Roblox's popularity among children exploded during the pandemic when the app was flooded with millions of new users as kids were confined to their homes and glued to their devices.

33. By September 2020, roughly 31.1 million people, more than half of them under 13, were on Roblox daily,[12] making it the world's biggest on-line gaming platform for kids. That growth has continued unabated. In Roblox's Annual Report for 2024, the company reported an average of 82.9 million daily active users, with 20 percent under nine years of age, 20 percent from 9-12 years of age, and 16 percent from 13-16 years of age. Roblox has boasted that as many as two-thirds of all children ages 9 to 12 in the United States have accounts.

34. Applying these nationally reported usage rates to Census population data indicates that likely half a million kids in the County alone have Roblox accounts.[13]

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

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[12] Roblox Filings, *supra* note 2.

[13] U.S. Census Bureau American Community Survey estimates indicate that the County has approximately 650,000 children between the ages of 9 and 12. Applying Roblox's own statement that as many as two-thirds of U.S. children in this age range have Roblox accounts yields a conservative estimate of approximately 430,000 children ages 9–12 in Los Angeles County who have Roblox accounts, assuming local usage mirrors national trends. This estimate excludes younger children and older minors and therefore understates the total number of minor users in the County.

spends 139 minutes a day on the app.[14]

36. Beyond the digital sphere, Roblox markets physical goods to children through brick-and-mortar retailers. According to Roblox's website, physical Roblox gift cards are carried at retailers such as Walmart, Target, Walgreens, CVS, Best Buy, 7-Eleven, Dollar General, Family Dollar, GameStop, and Kroger.[15] These gift cards can be redeemed for Robux, Roblox's virtual currency. Roblox also sells, either directly or via licensing partnerships, physical items such as Roblox action figures and toys. These physical gift cards and toys sold at brick-and-mortar locations are meant to drive children onto Roblox's platform. This retail marketing and monetization strategy underscore that children are a target demographic for the company.

**4. *Robux: Roblox's money maker***

37. Roblox generates revenue largely by selling users an in-game digital currency called Robux, which they exchange for digital content such as online experiences and customized outfits and appearances for their avatars. Roblox designed and operates its platform so that participation, customization, and advancement within the ecosystem are closely tied to Robux transactions.

38. Robux can be purchased in a single transaction or a user may subscribe to receive Robux on a recurring basis with a Roblox Premium membership. Roblox also offers Robux gift cards, discussed above, that anyone can purchase and send to any user. Through these monetization choices, and by making Robux central to the user experience, Roblox encourages increased spending and extended engagement by minor users.

39. Children frequently become obsessed with purchasing or otherwise obtaining Robux. Roblox's virtual economy is designed to incentivize children's spending on avatar customization and in-experience purchases by tying status and participation to paid features. In Roblox's Avatar Store, for example, the company sells rare items at astronomical prices, such as a

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

[15] *Roblox | Gift Cards,* Roblox https://www.roblox.com/giftcards-retailers-us (last visited on January 17, 2026).

type of hair for an avatar. Children seek to purchase these features to keep up with or outdo their peers on Roblox.

40. This dynamic creates foreseeable opportunities for adults to manipulate and exploit children through Robux-related coercion and enticement. Indeed, children often tell others, including strangers, that they will do "Anything for Robux."[16]

**B. <u>Roblox Deceives Parents into Letting Their Kids Use Roblox with Promises of Safety.</u>**

41. Roblox's success and continued growth have hinged on its constant, false assurances to parents that its app is safe for children. These safety assurances are not isolated statements, but rather a sustained marketing strategy directed at parents. The company has offered such assurances throughout its history and in every forum possible—on its website, through public promises of its highest executives, in news articles, on podcasts, and on and on. By repeatedly assuring parents that Roblox is safe, Roblox uses safety messaging to expand and retain its child userbase.

42. Over the years, Roblox has repeatedly represented on its website that its app is safe for children and has touted the safety controls, policies, and enforcement practices it has in place. As early as 2007, Roblox's website assured parents that Roblox is an "online virtual playground . . . where kids of all ages can safely interact, create, have fun, and learn."[17] By holding itself out as a "safe" space for kids of all ages, Roblox encouraged parental trust and normalized children's unsupervised use of the platform.

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[16] Olivia Carville & Cecilia D'Anastosio, *Roblox's Pedophile Problem*, Bloomberg Businessweek (July 23, 2024) https://www.bloomberg.com/features/2024-roblox-pedophile-problem/.

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

43. From 2008 to 2016, the website continued to promise parents, "We take every precaution possible to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content."[18] It also assured parents that Roblox has a zero-tolerance policy for "swearing and obscenities, messages and content of a sexual or violent nature, and any sort of aggressive or threatening communication," and "immediately suspended or permanently expelled" any offenders.[19]

44. The website has consistently sought to paint Roblox as "family friendly" and safe for children of all ages. In 2017, Roblox began declaring that it "take[s] kids' safety and privacy very seriously" and "strive[s] to continually develop new and innovative technologies that will protect the safety of our community while allowing players to imagine, create, and play together in a family-friendly environment."[20] Roblox similarly has advertised its app as "a safe, moderated place to meet, play, chat, and collaborate on creative projects."[21]

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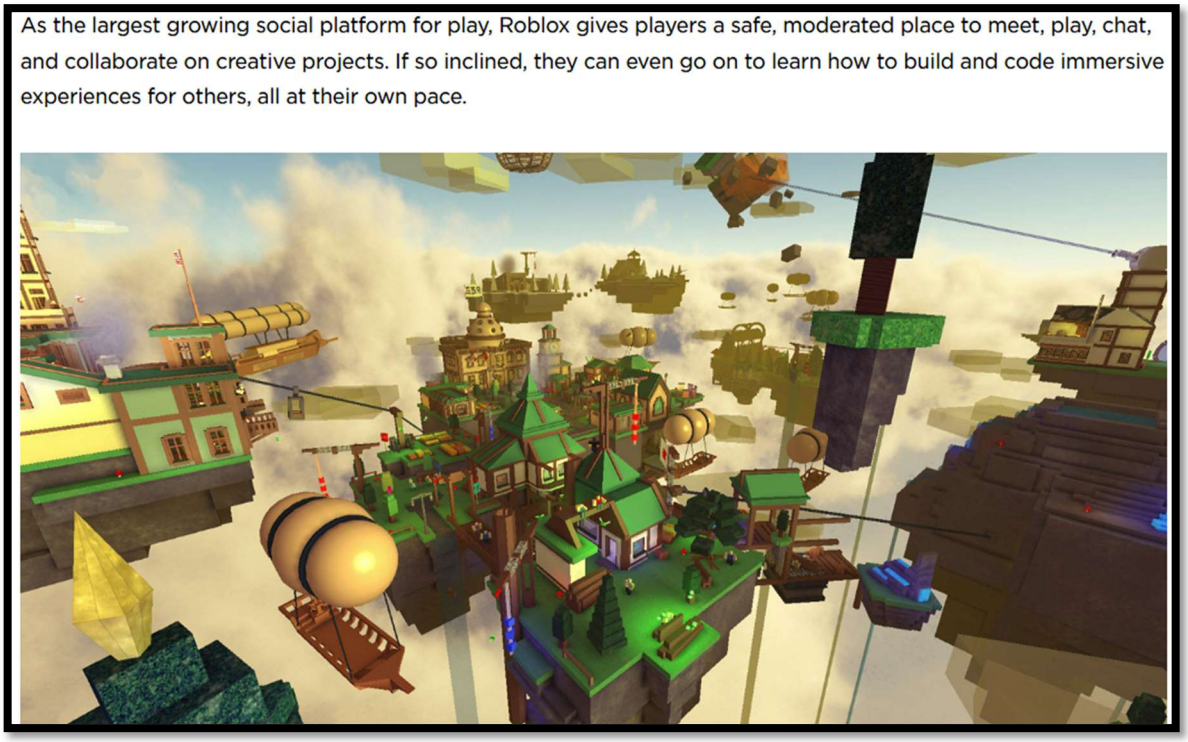
[18] Roblox, *Keeping Kids Safe*, https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx (archived May 1, 2008); *see also* Roblox, *Information for Parents*, https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents (archived Jan. 31, 2016).

[19] *Id.*

[20] Roblox, *Parents' Guide*, https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/ (archived Jul. 16, 2017).

[21] *Id.*




*Excerpt from Roblox's 2017 Parents' Guide*

45. Roblox's website representations have remained largely unchanged. In 2023, for example, Roblox assured parents that it "continually develop[s] cutting-edge technologies to ensure that the Roblox platform remains a safe and fun space for players all over the world."[22] Roblox claimed that the company was "dedicated to working together with parents and digital safety experts to promote a family-friendly environment that allows all players to imagine, create, and play online,"[23] and Roblox used that assurance to market the platform to families deciding whether to permit minors to join and remain active on Roblox. Roblox emphasized that it is "committed to ensuring that Roblox is a safe and fun place for everyone."[24] According to Roblox, it "goes above and beyond to foster an environment where people of any age can create, play,

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[22] Roblox, *For Parents*, https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/ (archived Apr. 5, 2023).
[23] *Id.*
[24] Roblox, *Roblox FAQ*, https://web.archive.org/web/20230328011957/https://corporate.roblox.com/faq/ (archived Mar. 28, 2023).

learn, and imagine safely. We've kept children's privacy and safety top-of-mind when designing our platform, especially through the implementation of advanced text filters that block inappropriate language or other unsafe content."[25]

46. Roblox continued to make similar assurances on its website. In 2025, for example, Roblox claimed, "Safety is in our DNA: when Dave Baszucki and Erik Cassel launched Roblox in 2006, they spent a few hours each day with the community, helping to ensure that Roblox was a safe and welcoming environment. Safety was their top priority, and they made constant improvements in their moderation, both for content and for communication on the platform."[26]

47. According to the current website, Roblox "won't allow language that is used to harass, discriminate, incite violence, threaten others, or used in a sexual context."[27] Roblox touts a "stringent safety system and policies,"[28] which include its "large, expertly trained team with thousands of members dedicated to protecting our users and monitoring 24/7 for inappropriate content"; its "safety review of every uploaded image, audio, and video file, using a combination of review by a large team of human moderators and machine detection before these assets become available on our platform"; and its chat filters for inappropriate content, which "are even stricter" for children under 13 and "include any potentially identifiable personal information, slang etc." [29]

48. These false promises and assurances are not confined to Roblox's website. They are repeated in statements by the company's highest executives, including in direct response to concerns raised by parents.

49. In 2009, for instance, a blogger wrote about blocking Roblox because he doubted

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[25] Roblox, *Roblox & User Data FAQ*, https://en.help.roblox.com/hc/en-us/articles/4406238486676-Roblox-User-Data-FAQ (last visited Feb. 11, 2025).
[26] Roblox, *Safety Comes First on Roblox*, https://corp.roblox.com/safety-civility-resources?section=news&article=safety-comes-first-on-roblox (last visited Feb. 11, 2025).
[27] Roblox, *Safety Features: Chat, Privacy & Filtering*, https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200than%20younger%20players (last visited Feb. 16, 2026).
[28] Roblox, *Safety & Civility at Roblox*, https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox (last visited Feb. 16, 2026).
[29] *Id.*

its safety for his children. CEO David Baszucki responded to the blogger reassuring him that Roblox flags "obviously offensive content" and removes it, and if "something is marginal, but gets flagged as inappropriate," Roblox "investigate[s] immediately."[30]

50. In a 2013 *Wired* interview, when asked whether a parent should be concerned about whom his child was chatting with in-game, Baszucki, in a public-facing effort to reassure parents and minimize safety concerns, declared, "We take every precaution possible to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content,"[31] taking a sentence verbatim from Roblox's webpage for parents, and presenting it as reassurance to parents considering whether to allow their children to use the platform.

51. Tami Bhaumik, Roblox's current Vice President of Civility & Partnerships, has doubled down on these promises in statements to parenting magazines, news outlets, and podcasts, repeatedly representing Roblox as safe for children in order to persuade parents and caregivers to permit minors to use the platform. She also has contacted international online safety experts in an effort to sell Roblox's safety story to the public, despite persistent risk to child users.

52. As recently as 2024, Bhaumik, falsely representing that child safety is Roblox's paramount operational commitment, told *Parents Magazine* that "[w]e have a responsibility to make sure our players can learn, create, and play safely. This continues to be our most important priority and that will never change."[32]

Parents

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[30] Eric Frenchman, *Revisiting Roblox*, Pardon My French (Oct. 5, 2009), https://pardonmyfrench.typepad.com/pardonmyfrench/2009/10/revisiting-roblox.html.

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

[32] 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-forkids/.

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

53. Such statements by Bhaumik date back years. In 2018, Bhaumik told the *Washington Post* that Roblox "focus[es] on making sure that everything is done in a safe and appropriate way."[33] That year, she also claimed to another newspaper that Roblox's "safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate."[34] She also boasted that Roblox has "created extensive parental controls for our games and a detailed Roblox Parent's Guide that provides information to parents to help create a Roblox experience that's best for their child,"[35] holding Roblox out as a platform with comprehensive protections for minors.

54. Bhaumik, while representing Roblox on a 2019 Digital Civility Panel, claimed that Roblox maintained effective systems to protect children, emphasizing that "[w]e make sure there's a safe environment," citing Roblox's "tremendous reporting system" and "incredible moderation and CS team that reacts very, very quickly."[36] On that same panel, and in contradiction to Roblox's representation that it had always taken "every precaution possible" to protect children, Bhaumik conceded that "digital civility did not exist at Roblox a year and a half ago and we established this

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

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

[35] *Id.*

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

and made it a movement within our company."[37] She added later, "It's still very early days for us. This whole digital civility focus for Roblox is still there, we're just still establishing it."[38]

55. Bhaumik, in a 2022 video interview, continued to promote Roblox's safety narrative to parents and the public, asserting that Roblox's "number one priority" is "to create a safe, civil, and inclusive community" and that "[s]afety and civility has always been baked into everything that we do."[39] She also bragged about Roblox's purported safety protections, including "thousands of human moderators on the front lines" and "machine learning that is constantly taking a look at chat filters."[40] With these and other measures, she exclaimed, "[a]ny sort of bad actor that comes onto the platform is dealt with swiftly," and "[w]e remove any content that's reported to us within minutes."[41]

56. Matt Kaufman, formerly the Chief Systems Officer for Roblox, was appointed Chief Safety Officer in 2023, and quickly began spreading Roblox's false child-safety narrative to the public, including parents in California.

57. Kaufman, in a 2024 blog post on Roblox's website, represented Roblox had long prioritized children's safety and as operating one of the safest online environments for minors. Kaufman asserted that "Roblox has spent almost two decades working to make the platform one of the safest online environments for our users, particularly the youngest users. Our guiding vision is to create the safest and most civil community in the world."[42] According to Kaufman, "For users under 13, our filters block sharing of personal information and attempts to take conversations off Roblox, where safety standards and moderation are less stringent."[43] A few months later, he

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[37] *Id.*
[38] *Id.*
[39] Video Interview with Tami Bhaumik, Roblox's VP of Digital Civility & Partnerships (2022), https://www.facebook.com/bedford.sheriff/videos/roblox-how-to-help-kids-use-itsafelyrobloxs-vp-of-digital-civility-partnerships/1338989609901259/.
[40] YouTube, Into the Metaverse, Podcast: EP.21: Tami Bhaumik (Roblox) - Building a Safe & Resilient Metaverse https://www.youtube.com/watch?v=LT5_bBOYS9A.
[41] *Id.*
[42] Matt Kaufman, Chief Safety Officer, *Driving Civility and Safety for All Users*, Roblox (July 22 , 2024) https://corp.roblox.com/newsroom/2024/07/driving-civility-and-safety-for-allusers.
[43] *Id.*

added, "Safety is and always has been foundational to everything we do at Roblox."[44]

58. Kaufman touted, in another blog posting Roblox's "track record of putting the safety of the youngest and most vulnerable people on our platform first."[45]

59. Kaufman also recently told *NPR* that "any time anything happens to a child that puts them at risk is one too many,"[46] a statement that reinforces Roblox's public portrayal of itself as relentlessly focused on preventing harm to children.

**C. <u>In Reality, Roblox Is a Digital and Real-Life Nightmare for Children.</u>**

60. Roblox's public statements and promises are carefully crafted to paint the picture of a digital playground that is safe and appropriate for children. When parents, the press, or child advocates raise questions and concerns, the company's highest executives respond with assurances about safety and representations that Roblox's technology effectively protects children.

61. This campaign of lies masks the truth about Roblox. Far from creating a safe place for children, Roblox designed, built, and maintains a toxic environment through its platform design choices, default communication settings, and failure to implement meaningful verification and enforcement mechanisms that has enabled obscene material to flourish and, worse, created foreseeable pathways that enable predatory pedophiles to hunt, groom, and sexually exploit children. What Roblox represents and advertises as a safe, appropriate space for children is, in fact, a digital and real-life nightmare for kids.

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

[45] 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.

[46] 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. ***Roblox hosts and promotes graphic, sexually explicit content.***

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

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

64. As early as 2010, Roblox's virtual games had already devolved into hosting and promoting sexually explicit content. Roblox's scripting language, which allows developers to manipulate avatar activity and interactions any way they want, was deployed to create scenarios where avatars engaged in simulated sexual activity.[47]

65. This simulated sexual activity pervades Roblox. There have been numerous reports of children's avatars being raped by other users' avatars. For example, in 2018, a seven-year-old girl's avatar was violently raped by two male avatars on a playground in a Roblox experience, which was witnessed by the girl's mother.[48] In describing the aftermath of this traumatic experience, the girl's mother exclaimed, "I never in my wildest dreams would've ever imagined that I would have to talk with my seven-year-old about rape."[49]

66. Roblox also hosts a staggering number of experiences centered on simulated sexual

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

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

[49] *Id.*

activity. For instance, children can play in "condo games," predatory digital environments, including houses, where users can remove their avatars' virtual clothing, revealing nudity, and engage in disturbing simulated sexual activities with other Roblox users.[50] They can also play games like "Public Bathroom Simulator Vibe," which allows access to users as young as nine-years-old and enables users to simulate sexual activity in virtual bathrooms,[51] as well as virtual strip clubs, where child avatars perform sexually explicit acts, like giving lap dances to patrons.[52]

(Source: Roblox "Public Bathroom Simulator / Game)

*Roblox's Public Bathroom Simulator Game is rated ages nine and up and allows users to simulate sexual activity.*[53]

67. 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

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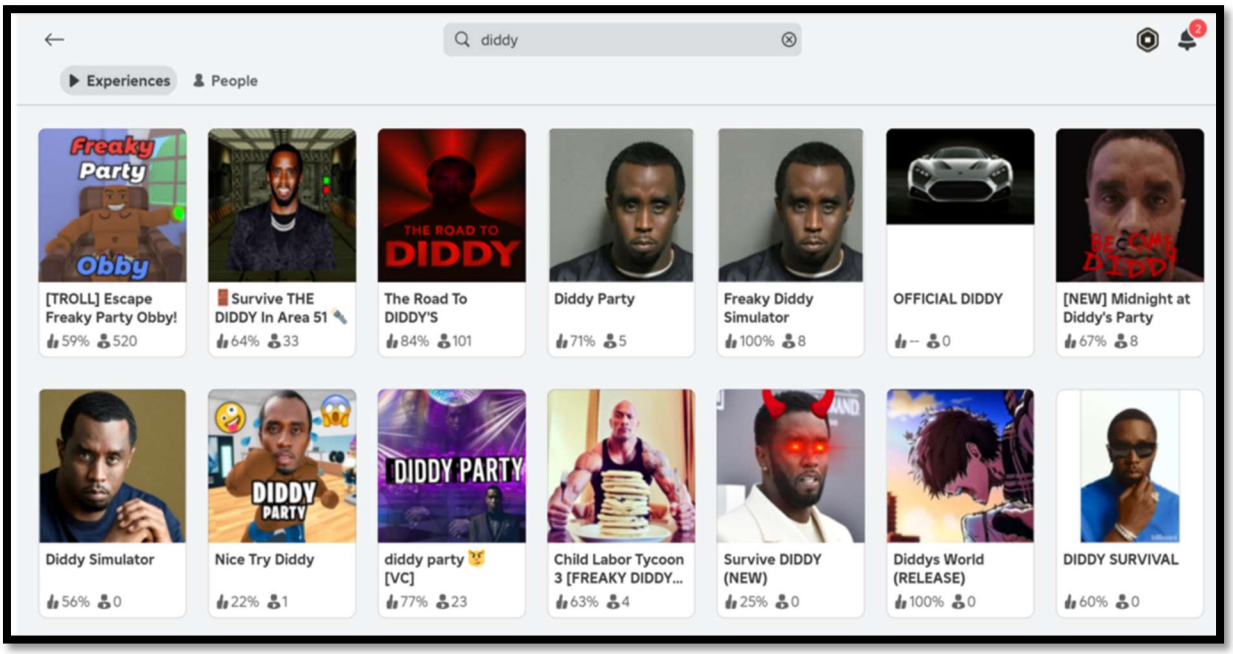
[50] EJ Dickson, *Inside the Underground Strip-Club Scene on Kid-Friendly Gaming Site Roblox,* Rolling Stone (Sep. 12, 2021), https://www.rollingstone.com/culture/culture-features/roblox-virtual-strip-clubs-condo-games-sex-1197237/.
[51] Hindenburg, *supra* note 4.
[52] Dickson, *supra* note 50.
[53] Hindenburg Research, *supra* note 4.

was convicted for sex trafficking of minors 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.




*Examples of Roblox games modeled after Diddy's sex trafficking ventures*.[54]

68. 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.

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[54] *Id.*

*Example of Roblox game modeled after Jeffrey Epstein's sex trafficking ventures*.[55]

69. Roblox played a direct role in enabling these rampant, sexually exploitative experiences. Roblox is fully aware that these experiences pervade its app, and it allows them to continue to exist unchecked despite the ability to control or eliminate them. Leaked internal Roblox documents reveal that Roblox monitored this type of content and made decisions such as "[h]ow big of a 'bulge'" was acceptable, and, with the introduction of layered clothing for avatars (*i.e.*, allowing avatars to wear multiple layers of clothing), whether players could be nude.[56] By maintaining platform settings and enforcement decisions that permitted this type of content to remain available and easily accessible, Roblox directly contributed to the proliferation of games simulating sexual activity, such as condo games and virtual strip clubs.

70. The effects of these games on children can be devastating. Playing video games with explicit sexual content normalizes exploitative and predatory behavior, blurring the lines of what is acceptable in real life. This is particularly harmful for children, who are still developing their understanding of social norms and morality. When such behavior is depicted as humorous,

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[55] *Id.*

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

exciting, or rewarded within a game, young players can internalize the idea that harassment or sexual exploitation is harmless or even acceptable.

71. Studies support this connection. One study found that playing games with sexualized content was linked to increased rates of sexual harassment toward female targets, suggesting that such exposure desensitizes players to the real-world consequences of these actions.[57] Another study showed that playing mature-rated games was associated with higher rates of risky sexual behavior years later, highlighting the long-term impact of exposure to sexualized or exploitative content.[58]

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

73. The dangerous content on Roblox is not limited to online games. The recent investigative report discussed above found that a basic search for "adult" in Roblox revealed a group with 3,334 members "openly trading child pornography and soliciting sexual acts from minors."[59] And tracking these members unearthed additional Roblox groups engaged in the same criminal conduct, including one massive group with 103,000 members.[60] Yet Roblox failed to implement any age restrictions, access barriers, or meaningful safeguards on these criminal groups, deliberately leaving them accessible to all users through Roblox's own search and group features.[61]

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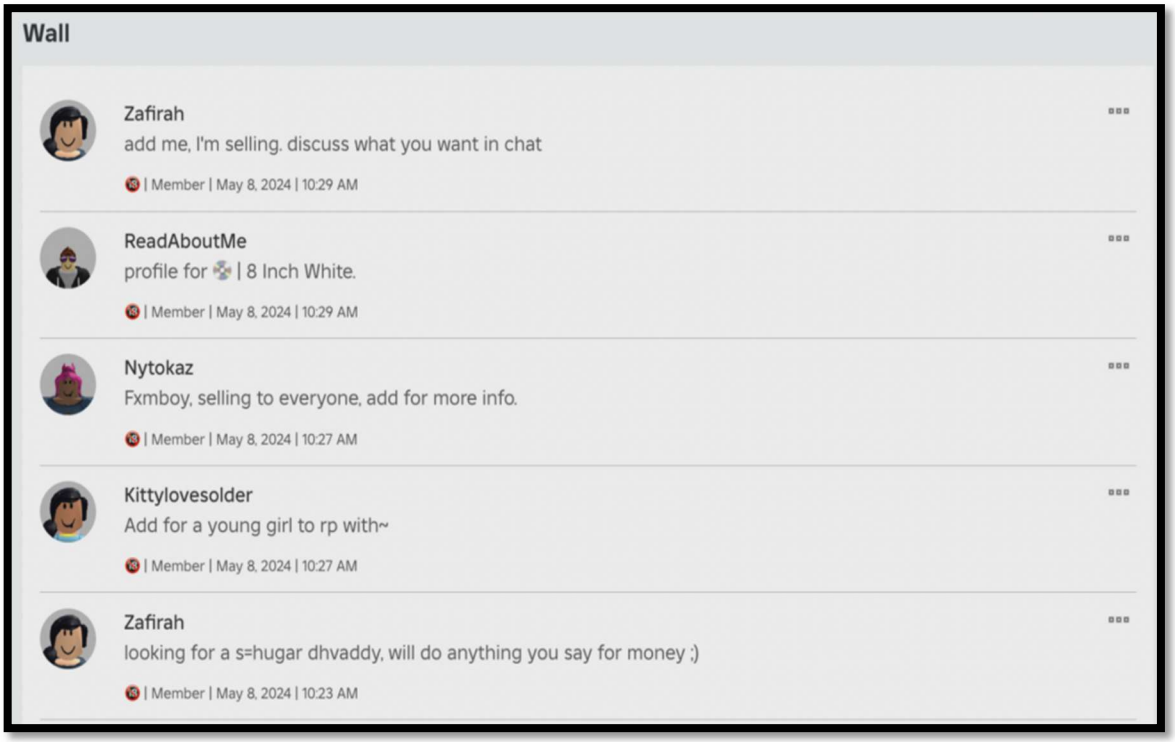
[57] Jonathan Burnay, Brad J. Bushman & Frank Larøi, *Effects of Sexualized Video Games on Online Sexual Harassment*, 45 Aggressive Behavior 2, 214 (March/April 2019).
[58] Jay G. Hull et al., *A Longitudinal Study of Risk-Glorifying Video Games and Behavior Deviance*, J. Pers. Soc. Psychol. 2014 August; 107(2): 300–325. doi:10.1037/a0036058.
[59] Hindenburg Research, *supra* note 4.
[60] *Id.*
[61] *Id.*




*Public chat wall for a group named "Adult Studios," where users openly solicited child pornography.*[62]

74. Roblox has also enabled individuals to create an entire category of pornographic content. Using Roblox's tools and software, users make virtual sex videos between avatars on Roblox, leveraging Roblox's platform functions, avatar systems, and animation capabilities. These videos are clearly marked with the .rbxl file extension, Roblox's proprietary file format, establishing that this content was created within the Roblox application. Moreover, on XVideos, a pornography website, Roblox users seek out other users to simulate sexual acts within seemingly innocuous Roblox games, like Brookhaven, which is one of Roblox's most popular experiences and is available to all users, regardless of age, demonstrating how Roblox's child-accessible experiences can be used as an entry point for sexualized roleplay and grooming.

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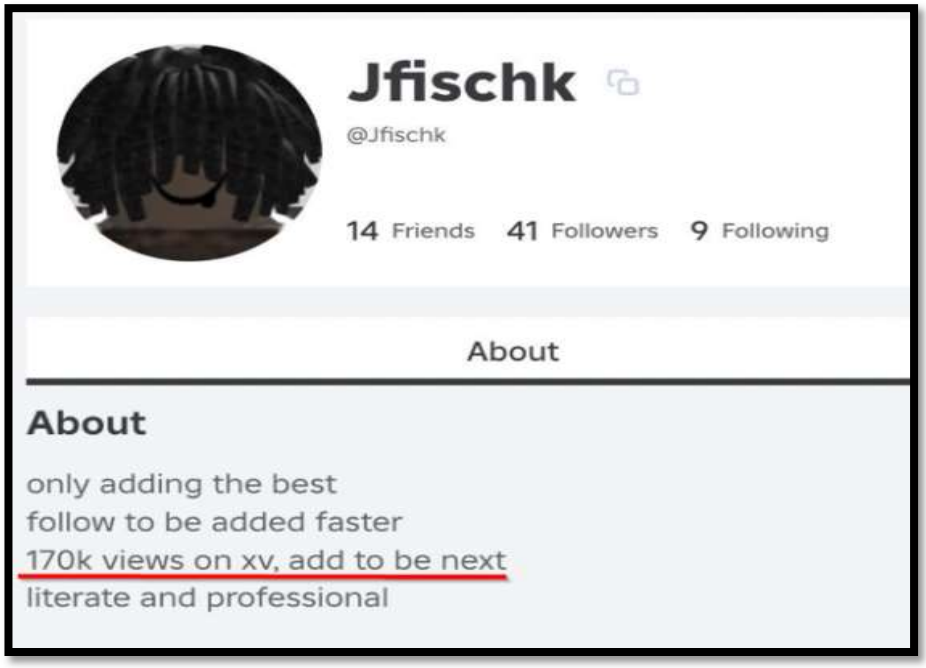
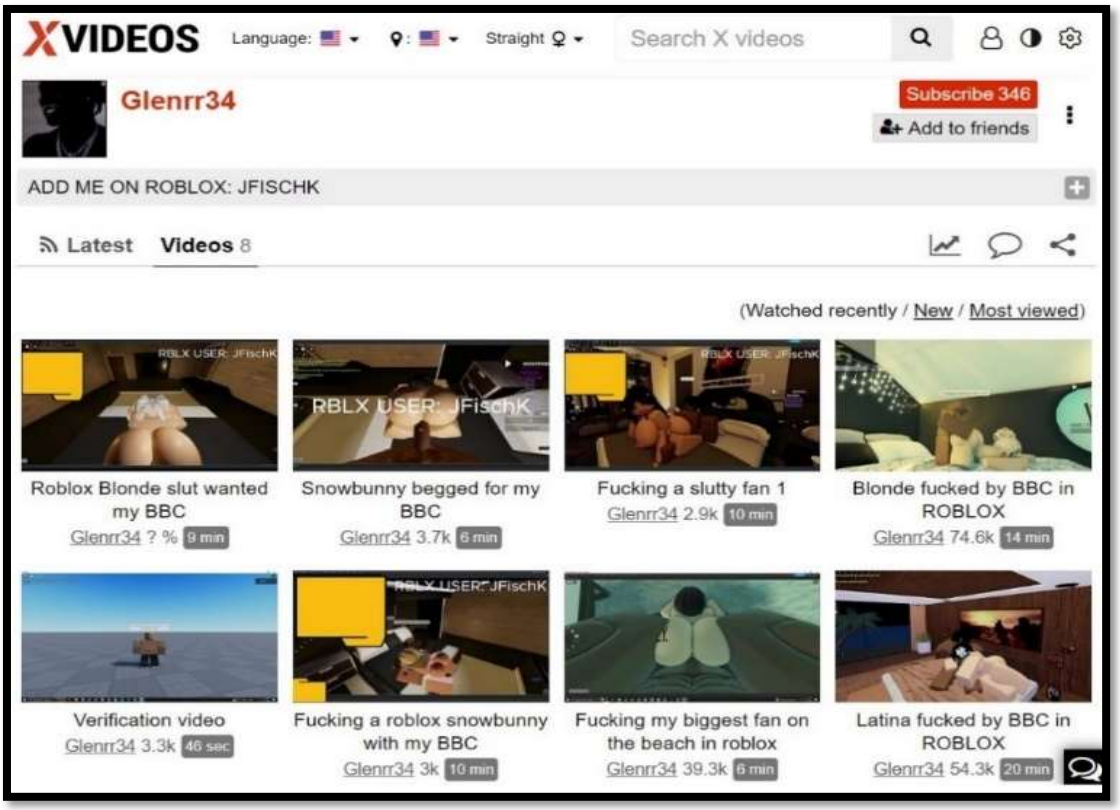
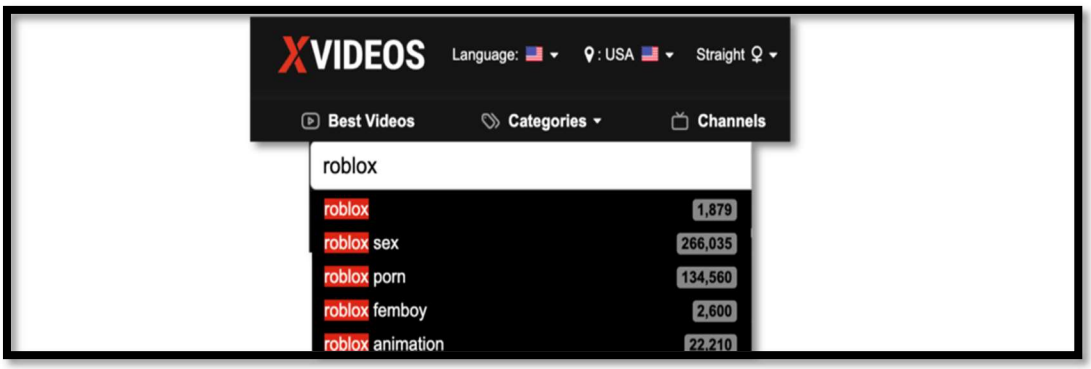
[62] *Id.*



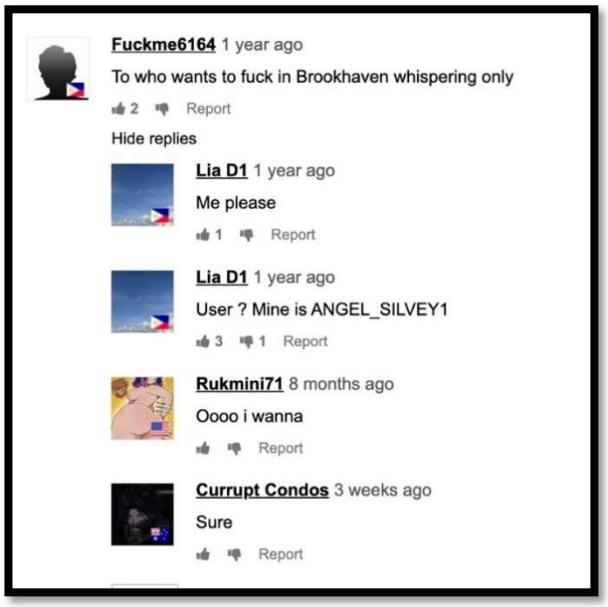




*This Roblox user advertised their Roblox account on porn website, XVideos, where they had uploaded videos of their avatar having sex with other Roblox users.*[63]

[63] *Id.*




*Searching "Roblox" on XVideos, a porn website, yields more than 250,000 results.*[64]




*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.*[65]

75. The online environment that Roblox designed, maintains, hosts, and enables through its platform architecture, default settings, and enforcement choices, 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.

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[64] *Id.*
[65] *Id.*

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

76. For years, Roblox has served as the foreseeable and highly accessible 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 child-dominated experiences and communication features 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.

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

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

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

80. Once they lure children from Roblox to other apps, like Discord or Snapchat, predators escalate their exploitation by soliciting explicit material, like nude photos or videos of children doing sexually inappropriate acts, all of which constitute child pornography. And while the ultimate solicitation of explicit photos or other criminal acts may occur on other apps, Roblox

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[66] Carville & D'Anastosio, *supra* note 16.

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

serves as the critical facilitator that enables these predators to first identify, target, and then gain the trust of young victims through its platform's design and inadequate safety measures.

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

82. Roblox knows exactly how its platform is being weaponized to exploit children, but it has refused to implement any guardrails to ensure Robux transactions are part of legitimate in-game transactions. Instead, Roblox profits directly from the Robux transactions predators use to coerce and extort minors. That decision lays bare Roblox's reckless indifference and its willingness to put profits ahead of the basic safety of children on its platform.

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

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

85. Regardless of how the initial grooming relationship begins, which is often as simple as someone asking the child to be their boyfriend or girlfriend, the predators also often attempt to make in-person contact with the child. The dangerous progression from Roblox's

online app to real-world violence reveals the devastating consequences of the company's product. Roblox's app enables predators to escalate from virtual contact to arranging physical meetings, leading to harassment, kidnapping, trafficking, violence, and sexual assault of minors, all instances of which these children suffered as a direct and foreseeable result of Roblox's actions.

86. Through numerous well-documented and publicized cases, Roblox has long been aware of the systemic exploitation that its app enables and facilitates. For years, countless children have been sexually exploited and abused by predators they met on Roblox, yet Roblox has failed to implement safeguards commensurate with the known risks to children.

87. For example, in 2017, the design of Roblox's app enabled a predator to target an eight-year-old child and solicit explicit photos, prompting one mother to observe that Roblox had created "the perfect place for pedophiles."[68]

88. In 2018, Roblox's app enabled a predator posing as a child to coerce a nine-year-old girl into performing and filming sexually abusive acts on her four-year-old brother through violent threats, including of death, against her family.[69] That year, 24 men in New Jersey were also charged with soliciting sex from minors as part of a sting operation, where the New Jersey State Police Lieutenant specifically called out Roblox as a place where "individuals are posing as someone else" in order "to gain someone's trust."[70]

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

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

[70] *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.

89. In 2019, a Florida predator systematically used Roblox to target children ages 10-12, moving them to Discord to coerce the children into sending him naked pictures of themselves.[71] That year, a man in Wales encouraged 150 children to engage in sexual activity by contacting them through Roblox, where he pretended to be a child and used fake names.[72]

90. During the pandemic, reports of child sex abuse facilitated by Roblox accelerated. In 2020, for example, Roblox enabled a 47-year-old predator to pose as a teenager, target a 16-year-old girl, move the conversation to Facebook, solicit explicit photos and videos, all of which constituted child pornography,[73] and ultimately traffic her across state lines, raping her multiple times.[74] In Michigan, a man was arrested for persuading an eight-year-old girl to send him videos of herself, in various stages of undress, in exchange for Robux.[75] The perpetrator had been arrested for similar offenses three years earlier and was a registered sex offender in Kansas.

91. This perpetrator was not the only convicted sex offender who was able to freely create accounts on Roblox: in 2021, a convicted sex offender used Roblox to sexually solicit a 12-year-old child.[76] And in 2022, a 33-year-old man groomed a 13-year-old girl on Roblox, transported her from her home in Kansas to his home in Georgia, and raped her multiple times.[77]

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

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

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

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

[75] *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.

[76] Jeff Bonty, *Man Charged With Soliciting Juvenile Through Roblox*, Daily Journal (Jul. 23, 2 21) https://www.shawlocal.com/daily-journal/.

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

92. 2023 brought more of the same. For example, a 30-year-old man was arrested for soliciting illicit photos from young victims and authorities reported that he had three separate Roblox accounts.[78] A 27-year-old man was arrested for kidnapping an 11-year-old girl whom he met on Roblox.[79] A 23-year-old New Jersey man, who was a prominent Roblox developer with a known history of exploiting children via Roblox, was sentenced to 15 years in prison for grooming a 15-year-old girl, transporting her to his house, and sexually abusing her.[80]

93. Similar incidents continued throughout 2024. For example, a 21-year-old Chilean man was arrested for traveling to the U.S. to meet an underage girl he met on Roblox, where he had "spent several months manipulating and grooming" her.[81] A 21-year-old in California pled guilty for directing a 10-year-old girl, whom he met on Roblox, to disrobe and touch herself.[82] A 64-year-old man admitted to posing as a 13-year-old boy on Roblox, where he met a 12-year-old girl and convinced her to send sexually explicit photos of herself and a young relative.[83] A 29-year-old Michigan man befriended and groomed an 11-year-old girl on Roblox by

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

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

[80] U.S. Dep't of Justice, *New Jersey Man Sentenced to 15 Years in Federal Prison After Grooming 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-grooming-minor-online-and.

[81] 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.

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

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

posing as a teenager and then coerced the girl into sending multiple explicit photos of herself.[84] And a 24-year-old man raped a 10-year-old girl he had met on Roblox.[85]

94. Despite supposed "parental controls" that Roblox implemented in 2024 and 2025, predators continue to enjoy easy access to children on the app, causing devastating harm. For example, in April 2025, a California man was arrested and charged with kidnapping and engaging in unlawful sexual conduct with a 10-year-old girl whom he met and communicated with on Roblox.[86] The next month, a 17-year-old Florida teenager was arrested after authorities learned he had been communicating on Roblox with numerous children, some as young as eight years old, over the course of a year, and convinced them to send him sexually explicit images of themselves.[87] And just a few days later, a New York man who used Roblox to connect with 11 and 13-year-old girls was arrested and federally charged with enticement and possession of child pornography.[88]

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

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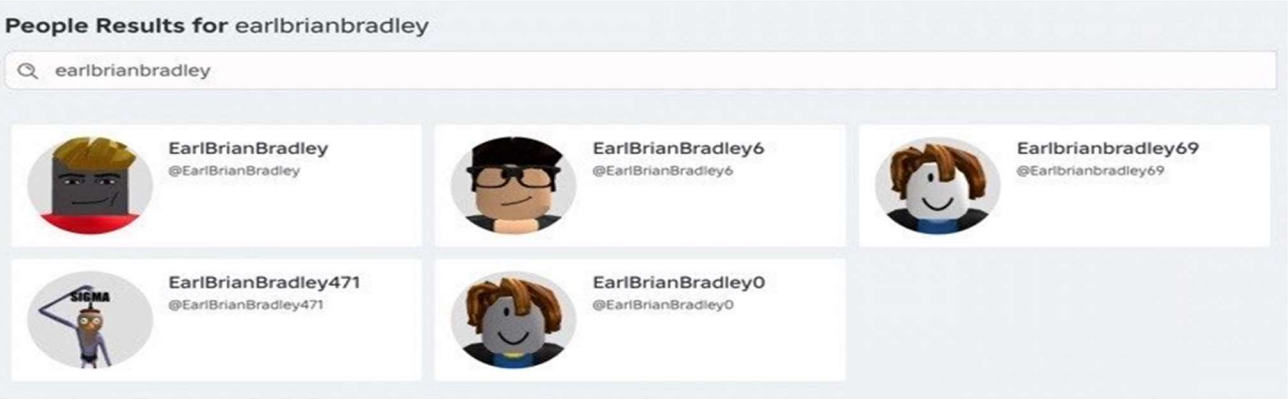
[84] Michael Martin, *Roblox Predator: School Staffer Accused of Grooming West Michigan Child for Illicit Photos*, Fox17 West Michigan (Jan. 16, 2025), https://www.fox17online.com/news/local-news/roblox-predator-school-staffer-accused-of-grooming-west-michigan-child-for-illicit-photos.

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

[86] *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-kidnapping-kern-county-girl-roblox/.

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

[88] 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-roblox-attempt-communicate-minors-sex-arrested.




*Results from an account search for "earlbrianbradley."*[89]

96. Roblox's systematic endangerment of children has been publicly condemned by leading advocacy organizations. The National Center on Sexual Exploitation ("NCSE") has consistently named Roblox to its "Dirty Dozen" list, an annual campaign exposing companies that facilitate, enable, or profit from sexual exploitation. The NCSE blasts Roblox for "treat[ing] child protection like a game."[90] According to the NCSE, "[u]ntil basic child protection standards are met, Roblox remains too high risk for kids."[91]

97. Parent reviews of Roblox on sites like *Common Sense Media* also document disturbing incidents of naked avatars, sexting, simulated sexual assault, and adult predators.[92]

98. The harm from this child abuse and exploitation extends beyond the initial victims. Through the design of its app and inadequate safeguards, Roblox has created an abusive ecosystem where former victims—children who were once exploited on Roblox—become teenage perpetrators who then prey upon younger users, making today's victims tomorrow's perpetrators. Indeed, researchers have repeatedly confirmed this victim-victimizer pipeline: when children are exposed to and victimized by sexual content, they are more likely to become

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[89] Hindenburg Research, *supra* note 4.
[90] National Center on Sexual Exploitation, *supra* note 67.
[91] *Id.*
[92] Common Sense Media, *Parent Reviews of Roblox*, https://www.commonsensemedia.org/website-reviews/roblox/user-reviews/adult (last visited Feb. 11, 2025).

desensitized teenagers and adults who then exploit younger users in the same ways.[93] In effect, Roblox contributes to this "raising of" predators who perpetuate the cycle of exploitation.

99. The magnitude of the harm caused by Roblox is devastating. As discussed below, Roblox's reports of suspected child sexual exploitation to the National Center for Missing and Exploited Children ("NCME") have surged from 675 reports in 2019 to 24,522 reports in 2024. These numbers are likely significantly lower than the real number of incidents because, as NCMEC itself emphasizes, many incidents go unreported by online platforms such as Roblox.[94]

100. Yet rather than warn parents, schools and the public, Roblox minimizes these dangers through repeated false and misleading public statements and strategic messaging designed to preserve growth and trust among families. Roblox's Chief Safety Officer, Matt Kaufman, attempting to deflect attention from serious safety failures, told NPR, "I think we're losing sight of the tens of millions of people where Roblox is an incredibly enriching part of their life."[95] And while Kaufman publicly claims that "any time anything happens to a child that puts them at risk is one too many,"[96] Roblox simultaneously admitted to investors that it was "unable to prevent all such [inappropriate] interactions from taking place."[97] This calculated contradiction between public messaging and private admissions—telling parents that even one incident is unacceptable while simultaneously acknowledging to investors that abuse is inevitable—exposes Roblox's strategy of prioritizing public relations through hollow and misleading public statements over its fundamental duty to protect children.

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

[94] National Center for Missing & Exploited Children, NCMEC Releases New Data: 2024 in Numbers (May 8, 2025) https://ncmec.org/blog/2025/ncmec-releases-new-data-2024-in-numbers.

[95] 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.

[96] *Id.*

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

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

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

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

102. From its inception, Roblox has focused on growth above all else, which has meant deliberately designing a platform that targets, attracts, retains, exploits, and capitalizes on the underdeveloped child market, positioning itself as a place where kids can learn and play games in a safe environment. Recognizing that children have more free time, underdeveloped cognitive functioning, and diminished impulse control, Roblox has built engagement and monetization mechanisms that exploit their developmental vulnerabilities to lure them to its app.

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

104. In 2021, riding the explosive growth in users generated by the pandemic and the pandemic-driven enthusiasm for technology stocks, Roblox went public at a valuation of $41 billion, which brought new pressures. To satisfy the scrutiny and demands of public market investors, Roblox, like many unprofitable companies, prioritized rapid growth in revenue and user engagement metrics—like new user acquisition, daily active users, and average hours spent on the app—on the theory that profitability would follow once the business achieved sufficient scale and operating costs decreased as a percentage of revenue.[98]

105. In pursuit of increasing its number of users and profit, Roblox deprioritized safety measures even further so that it could report strong numbers to Wall Street. For instance, Roblox executives rejected employee proposals for parental approval requirements that would protect children on the platform,[99] choosing instead to preserve frictionless onboarding and engagement. Employees also reported feeling explicit pressure to avoid any changes that could reduce platform engagement, even when those changes would protect children from predators.[100]

106. As one former Roblox employee explained, "You're supposed to make sure that your users are safe but then the downside is that, if you're limiting users' engagement, it's hurting our metrics. It's hurting the active users, the time spent on the platform, and in a lot of cases, the leadership doesn't want that."[101] That same employee added, "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

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

[99] Hindenburg Research, *supra* note 4.

[100] *Id.*

[101] *Id.*

them do what they want to do. And then the numbers all look good and investors will be happy."[102]

107. By limiting safety measures, Roblox not only increased its number of users but also reduced the company's safety expenses as a percentage of its revenue, a key metric for Wall Street, which views trust and safety costs as detrimental to Roblox's stock performance. Barclays, for example, identified its "downside case" for Roblox's stock as "additional safety investments due to its younger demographic . . . becom[ing] a drag on [earnings] margins."[103] Barclays also wrote that it viewed increased safety costs as a "negative" in Roblox's quarterly earnings,[104] explicitly framing child protection expenditures as a threat to profitability.

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

109. For example, on Roblox's 2023 fourth quarter earnings call, an analyst praised the "really high level of efficiency" seen in the numbers for infrastructure and trust and safety expenditures and then asked how those figures would evolve over time.[105] In response, Mike Guthrie, Roblox's then-CFO, emphasized the company's goal of reducing expenses, stating, "cost to serve is the metric that we use and it's the metric that the [infrastructure] team owns . . . *they're working hard to drive that down* . . . . [L]ike you said, it's about 11% now, ultimately with higher efficiency . . . we see that as a high-single-digit number over the next few years."[106] He added, "[W]e still think there's more to do there."[107]

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[102] *Id.*
[103] Ross Sandler, Trevor Young & Alex Hughes, *Back on Track Following the 1H Hiccup*, Barclays (Aug. 1, 2024)
[104] Ross Sandler, Trevor Young & Alex Hughes, *Everything Accelerating, Safety & Security a Top Priority*, Barclays (Nov. 1, 2024)
[105] Q4 2023 Earnings Call (Feb. 7, 2024).
[106] *Id.* (emphasis added).
[107] *Id.*

110. At other times, Guthrie reassured investors, stating, "look for trust and safety [costs] to scale below linear as we grow"[108] and that Roblox was "quite happy with" trust and safety costs growing "at a lower rate than our bookings growth."[109]

111. Similarly, in the second quarter of 2024, CEO Baszucki highlighted that, "[i]mportantly, our infrastructure and trust and safety expenditures were 8% lower year-on-year."[110]

112. Once public, Roblox also decided to try to attract more adult users to its app, which it had historically touted as the "#1 gaming site for kids and teens."[111] With the market for underage users near saturation, Roblox shifted its growth strategy to attracting older users.

113. In its public offering filings, Roblox identified "age demographic expansion" as a key strategy, explaining that it planned to develop experiences and content that appealed to older users.[112] For Roblox, "aging up" had benefits beyond user growth—it was also more profitable. Older users offered a distinct financial advantage. While children spend more hours on Roblox, they do not "monetize" as well because they are more constrained in their ability to spend. In contrast, older users, who "have more direct control over their spend" and "monetize better," are far more lucrative, an outcome that Roblox said it predicted when it started to target older users.[113]

114. Roblox's executives repeatedly emphasized their strategy of "aging up" the app to attract older users. At the company's inaugural conference with an investment bank in September 2021, Roblox's then-CFO, Mike Guthrie, noted that Roblox had achieved "very good penetration of nine to twelve year-olds," and was focused on adding users over the age of 13.[114]

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[108] Q4 2022 Earnings Call (Feb. 15, 2023)
[109] Q3 2022 Earnings Call (Nov. 8, 2023).
[110] Q2 2024 Earnings Call (Aug. 1, 2024).
[111] Roblox, *What Is Roblox*, http://web.archive.org/web/20170227121323/https://www.roblox.com/ (archived Feb. 27, 2017).
[112] Roblox Corp., S-1 (Securities Registration Statement) 7 (Nov. 19, 2020).
[113] Q2 2022 Earnings Call (Aug. 10, 2022).
[114] Roblox at Goldman Sachs Communicopia Conference (Sep. 9, 2021), https://ir.roblox.com/events-and-presentations/events/event-details/2021/Goldman-Sachs-Communicopia/default.aspx.

One plan was to "improve the search algorithms such that older users were finding older content," or content tailored to their age-related demographic.[115]

115. At its annual Developer Conference, CEO David Baszucki encouraged developers to create experiences for older audiences, explaining that Roblox was rolling out features designed to appeal to older users, including use of real names, screen capture and sharing capabilities, video calls, and relaxed chat moderation.[116] These decisions, while framed as growth strategies, reflected Roblox's willingness to compromise safety, creating new vulnerabilities and more dangerous circumstances for children in its pursuit of a more profitable, older userbase.

116. Roblox executives consistently highlighted progress with the company's "aging up" strategy on every quarterly earnings call after this until the second quarter of 2023, when CEO Baszucki declared that Roblox had achieved its goal: "We're no longer talking about aging up. We are a platform for all ages."[117] He also revealed that developers had started to "build specific 17-plus experiences."[118] This progress was praised by Wall Street investment banks, which noted that aged-up experiences were a promising indicator of "potential sustainable growth tailwinds for Roblox," reinforcing the company's pivot toward maximizing profitability.[119]

117. Despite Roblox's deliberate targeting of older users, it failed to implement any meaningful restrictions on contact between adult and child users or limit the mature content and experiences it solicited from developers to attract older audiences. When asked by an equity research analyst about aged-13-and-up experiences for older users, CEO Baszucki admitted, "I want to highlight right now that *we don't have any only 13 and up experiences*. We have 28% of the top thousand experiences having a majority of 13-plus [users] but *those are still experiences that are open to all ages.*"[120] Similarly, despite urging developers to build more mature

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[115] *Id.*
[116] Roblox Developers Conference 2023 Keynote (Sep. 8, 2023), https://www.youtube.com/watch?v=CwLThCghzA4.
[117] Q2 2023 Earnings Call (Aug. 9, 2023).
[118] Q2 2023 Earnings Call (Aug. 9, 2023).
[119] Benjamin Black et al., *Bookings Back on Track*, Deutsche Bank (Nov. 4, 2024).
[120] Q3 2021 Earnings Call (Nov. 9, 2021) (emphasis added).

experiences, Roblox continued to allow users to set up accounts without any type of age verification.[121] Even investors recognized the connection between older users and the increased risks for children, questioning how Roblox planned to prevent inappropriate content from reaching younger users.[122]

118. Not only did Roblox seek to increase adult users while knowing the risks that strategy posed to children, but it also sought to encourage relationships between users. At Roblox's 2023 Developers Conference, CEO Baszucki revealed Roblox's strategy to facilitate "real-life relationships" between users, *i.e.*, dating. While he deliberately avoided the word "dating," he then announced plans to build a product to support it: "I'm not going to use the D word but subsequent[] real-life relationships is going to happen, okay? And we're going to build a platform to support that,"[123] further demonstrating Roblox's push toward adult-oriented interaction within an ecosystem heavily populated by minors.

119. By the next year, in 2024, Baszucki explicitly acknowledged this strategy. He first acknowledged that online dating is "edgy" but then mocked his own safety team's concerns about the dangers—"the policy and safety team told me [dating and real-life relationships] isn't within our current policy right now"—to which the audience shared in laughter.[124]

120. In short, for years, Roblox has deliberately sacrificed child protection, a longstanding issue for the company, in pursuit of growth and profit. This systematic subordination of child safety to business objectives reflects Roblox's continued choice to maximize its business goals while knowingly exposing children to preventable dangers on its app through decisions about account creation, communication access, content labeling, and enforcement.

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[121] Q4 2022 Earnings Call (Feb. 15, 2023).
[122] Q3 2021 Earnings Call, *supra* note 120.
[123] Roblox Developers Conference 2023 Keynote (Sep. 8, 2023), https://www.youtube.com/watch?v=CwLThCghzA4.
[124] Roblox Developers Conference 2024 Keynote (Sep. 6, 2024); https://www.youtube.com/watch?v=HwbcWc2CwnM.

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

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

122. Roblox designed its app so that anyone can easily access, locate, and communicate with minor users, creating a virtual world where predators can freely target and groom children. Until November 2024, adult strangers could "friend" and chat with children of any age via direct messages. They could also chat with them within the in-game direct messages found within experiences even if they were not friends, all through default product settings chosen and maintained by Roblox. While Roblox has offered some adjustable parental controls for users under the age of 13, the in-game chat feature within experiences was available to everyone. These children could also bypass parental controls simply by creating an alternate account falsely identifying as a 13+-year-old user. By designing its app this way, Roblox stripped parents of basic protective options to prevent adult strangers from communicating with their children.

123. This practice contrasts sharply with other gaming products like Nintendo, which use preprogrammed dialogue options to tightly control user interactions.[125] By adopting a similar approach, Roblox could have significantly reduced, if not eliminated, the grooming and child abuse facilitated by its app's open chat design because predators would not have been able to solicit any personal information or send any coercive or sexually suggestive messages.

124. Roblox further endangered children by introducing voice calls in November 2023. Called "Roblox Connect," this virtual call feature allows users to have a conversation through their avatars in real time. Concerns were immediately raised about this feature. For example, one user emphasized, "This is a bad idea Roblox, and especially on your platform because this is

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[125] Carville & D'Anastosio, *supra* note 16.

where most predators are coming from, and it makes it way easier for predators to prey on children." [126]

125. As Roblox contemplated and rolled out Roblox Connect, it knew that this feature would drastically increase the risk to children on its app by expanding real-time communications with strangers on a platform heavily populated by minors. That is because another company had implemented a similar feature with disastrous consequences. Omegle was a chat website that operated from 2009 to 2023. Omegle allowed users, including children, to engage in anonymous chats with strangers. In March 2010, Omegle introduced a video-chat feature. Despite efforts to monitor for mature and sexual content, the website became infamous for exposing minors to explicit material, predators, and exploitation. Omegle's failure to protect users led to numerous incidents, including criminal cases involving child pornography. In November 2023, the same month Roblox launched Roblox Connect, Omegle announced that it would cease operations. In shutting down, its founder highlighted the site's misuse: "[T]here can be no honest accounting of Omegle without acknowledging that some people misused it, including to commit unspeakably heinous crimes."[127] And he thanked one survivor for "opening my eyes to the human cost of Omegle."[128] Nevertheless, Roblox introduced voice calls the same month that Omegle shut down.

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

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

[127] Omegle, https://www.omegle.com/ (last visited Feb. 11, 2025).

[128] *Id.*

127. In the process for creating an account, Roblox could have required children to provide their names and email addresses and obtain parental approval, a fundamental protection against predators, but chose not to do so. This decision allowed the company to bypass certain protections that are mandated by federal law and designed to protect children. The Children's Online Privacy Protection Act ("COPPA") prohibits companies like Roblox from collecting, using, or disclosing the personal information of children under 13 without verifiable parental consent. COPPA was enacted because Congress recognized the heightened vulnerability of children on the internet. As the Federal Trade Commission ("FTC") noted, children under 13 lack the capacity to "understand fully the potential serious safety and privacy implications" of sharing their personal information.[129] More recent international regulations are stricter. For example, the European Union's General Data Protection Regulation ("GDPR") requires verifiable parental consent for children under 16.[130]

128. The FTC has outlined clear and acceptable methods for obtaining verifiable parental consent. These include: (a) providing a form for parents to sign and return; (b) requiring the use of a credit card or online payment that notifies parents of each transaction; (c) connecting parents to trained personnel via video conference; (d) offering a staffed toll-free number for parental verification; (e) asking knowledge-based questions to confirm identity; or (f) verifying a parent's photo-ID by comparing it to a second photo using facial recognition technology.[131]

129. Yet instead of implementing safeguards to comply with COPPA, Roblox chose to bypass these protections altogether. Roblox intentionally avoids requesting a name or email address during sign-up to sidestep the requirement of verifiable parental consent. In fact, former

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

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

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

employees revealed that Roblox considered requiring verifiable consent, but ultimately resisted its implementation out of fear that such requirements might drive users away.[132] Consequently, creating a Roblox account is alarmingly easy, requiring less than sixty seconds and no meaningful oversight, a frictionless onboarding choice that prioritizes growth over the safety of its youngest users.[133]

130. Another easy-to-implement feature that would have improved safety is adding pop-up safety notices within chats and games to warn users about their behavior or the dangerous behavior of others. But Roblox executives also rejected this change.[134]

131. Additionally, although Roblox knew that predators routinely operate dozens of Roblox accounts at the same time, the company chose not to implement basic blocking of digital identifiers—both the unique network addresses that track internet connections (Internet Protocol or IP addresses) and the permanent hardware identification numbers assigned to devices (Media Access Control or MAC addresses) that could prevent predators from creating multiple accounts.[135]

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

133. Roblox also opted not to require users to verify their age by uploading a picture of either their or their parents' identification, a practice that many other applications employ. Doing so would have restricted the content available to young users and prevented predators from easily mispresenting their age, which is often their approach in targeting and grooming children. As one

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[132] Hindenburg Research, *supra* note 4.
[133] 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.
[134] Carville & D'Anastosio, *supra* note 16.
[135] *Id.*

father told the press after seeing other users solicit his avatar for sex, "There is nothing to stop adults going on there and pretending they're kids."[136]

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

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

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

137. Despite these glaring failures, Roblox aggressively markets and promotes itself as an "industry leader" when it comes to child safety.[137] Central to this self-serving narrative is its "accomplishment" of investing in artificial intelligence ("AI") and machine learning systems

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

[137] Q1 2021 Earnings Call (May 11, 2021).

supposedly designed to scan and monitor all communications on the app and prevent the sharing of inappropriate content and personally identifiable information.[138]

138. Yet this technology has proven grossly inadequate and insufficient to protect children. For example, Roblox's filters have inexplicable omissions. While Roblox blocks certain words, like "Snap" and "Snapchat," to supposedly prevent off-app communications, it allows workarounds such as the use of the ghost emoji ( 👻 ), which is widely recognized as a symbol for Snapchat, or alternative spellings, like "Snappy" or "apchat." Similarly, while the word "Discord" is blocked, users can bypass this filter by using the disc emoji ( 💿 ) or typing variations, like "iscord" or "cord."[139] That Roblox selectively blocks the words "Snap," "Snapchat," and "Discord" reveals that Roblox is fully aware of the dangers of off-app inappropriate communications yet chooses not to close these loopholes. And while Roblox prevents users from sharing phone numbers in numerical format, it does nothing to stop users from spelling out the numbers.[140]

139. Similarly, while Roblox attempts to block the word "condo"—a term that is widely used to identify sexualized experiences—countless external groups on platforms like Reddit and Discord are dedicated to helping users locate new explicit content on Roblox. *Fast Company,* a business publication and website, easily identified 150 Discord groups dedicated to exploiting Roblox's lack of robust enforcement.[141] These groups function as alert systems: as soon as Roblox removes one game, its ineffective safeguards allow the same game to be re-uploaded almost immediately from a new account, or by repeat offenders using alternate accounts, and the

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[138] 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).

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

[140] *Id.*

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

external groups immediately transmit the new game links to their members, perpetuating the cycle of explicit and harmful content.

140. Beyond Roblox's ineffective technology, the company also employs a woefully inadequate number of human moderators to analyze and manage content on its platform. With only about 3,000 moderators, Roblox pales in comparison to platforms like TikTok, which, despite having only three times the number of users, employs more than ten times the number of moderators at 40,000.[142] Roblox attempts to justify this disparity by claiming "[y]ou really can't judge the quality of these moderation systems by the number of people."[143] But the reality tells a different story. Roblox's moderators, many of them are overseas contractors, report being overwhelmed by an unmanageable volume of child safety reports, making it impossible to address all concerns effectively and leaving countless safety issues unresolved.[144]

141. The safety data that Roblox touts is flawed and only underscores the growing dangers created by the company's app. For example, Roblox proudly points to its low percentage of reports to the NCMEC, the leading U.S. nonprofit organization tasked with preventing child exploitation and assisting in the recovery of missing children. Roblox claims that it accounts for less than .04 percent of reports made to NCMEC.[145] But this data is entirely self-reported and therefore depends on Roblox's ineffective content moderation and safety team. This self-reported data to NCMEC, flawed and limited as it is, also reveals a disturbing trend: Roblox's reports about suspected child sexual exploitation have surged over the years, from 675 reports in 2019 to 24,522 reports in 2024.[146]

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[142] Carville & D'Anastosio, *supra* note 16.

[143] 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.

[144] Carville & D'Anastosio, *supra* note 16.

[145] 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.

[146] National Center for Missing & Exploited Children, *2019 CyberTipline Reports by Electronic Services Providers (ESP)*, https://www.missingkids.org/content/dam/missingkids/pdfs/2019-

142. Roblox also boasts that just "0.0063% of [its] total content was flagged for violating" policies. But Roblox itself controls the systems responsible for identifying and flagging violative content.[147] These lower percentages are thus a reflection not of safety but of Roblox's ability to minimize the appearance of problems through its own inadequate reporting and enforcement mechanisms. By hiding behind self-serving metrics and refusing to take meaningful action, Roblox has fostered an environment where children are subjected to irreparable harm while the company continues to reap financial rewards.

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

144. Roblox's own developers even admit that Roblox is unsafe for children.[148] Online forum discussion posts are replete with Roblox developers writing that they would not allow their own children to use the platform, citing pervasive issues with Roblox's child safety policies. Many of these posts highlight the platform's systemic failures, providing further signs to Roblox

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reports-by-esp.pdf; National Center for Missing & Exploited Children, 2024 CyberTipline Reports by Electronic Services Providers (ESP), https://www.missingkids.org/content/dam/missingkids/pdfs/cybertiplinedata2024/2024-reports-by-esp.pdf.

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

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

of the dangers of its platform, and suggest straightforward changes Roblox could implement to create a safer environment but has consistently ignored—for example:

a. "Unfortunately, it is worse now due to Roblox's moderation being so abysmal and Roblox being a far more widespread platform. Creeps flock aplenty when before the creep: kid ratio was much much lower . . . . Roblox has no interest in actually fixing the issues so long as the bad press doesn't end up viral."[149]

b. "No. Roblox is not safe for children. The amount of NSFW [Not Safe for Work] I see on this platform on a daily basis is unbelievable. I'm surprised COPPA hasn't taken any action."[150]

c. "I believe they need to automatically rate these games for older audiences, if not, you know, removing them entirely. I could keep going on about this issue, but it's just beating a dead horse at this point."[151]

d. "Roblox got banned for bad moderation; Turkey banned it to 'protect children,' and they are not wrong. The amount of visits from 10 of these games is, in summary, 100 million+. I don't want to know how many of these children have seen nudity or even developed a p*rn addiction. But that is a big problem with Roblox doing almost nothing to prevent it."[152]

145. These statements, coming from individuals familiar with Roblox's operations, paint a picture of an environment rife with neglect, where harmful content flourishes, predators thrive, and Roblox repeatedly fails to act, even in the face of widespread and urgent warnings that its platform design and enforcement practices are unsafe for children.

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[149] *Id.*
[150] *Id.*
[151] *Id.*
[152] *Id.*

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

146. After years of mounting pressure, Roblox recently announced changes to its child safety features, which were initially prompted not by the years of police reports and widespread media coverage but by a scathing report published by a well-known short seller accusing Roblox of being a "pedophile hellscape for kids."[153] Released on October 8, 2024, the report sparked public outrage, detailing many of the issues described above that Roblox had long ignored.

147. A little over a month later, Roblox announced a series of changes, including permanently removing the ability to message others outside of games on its app for under 13-year-old users;[154] giving parents a separate dashboard where they can monitor a child's Roblox account, view the child's friend list, set spending control, and manage screen time;[155] preventing games from using chalkboard writings where people could get around the censoring of communications;[156] and implementing restrictions to stop under 13-year-old users from accessing new Roblox games that are awaiting maturity ratings,[157] all changes within Roblox's control to implement at any time.

148. These belated changes do not alter the core platform design Roblox chose and maintained for years—one that permits adult access to child-populated experiences, enables real-time communications, and relies on self-reported ages rather than meaningful verification. In fact, these changes could all have been implemented years ago. None of them involves any new or groundbreaking technology. Roblox moved forward only when mounting public scrutiny and investor concern threatened its stock price and public image.

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[153] Hindenburg Research, *supra* note 4.

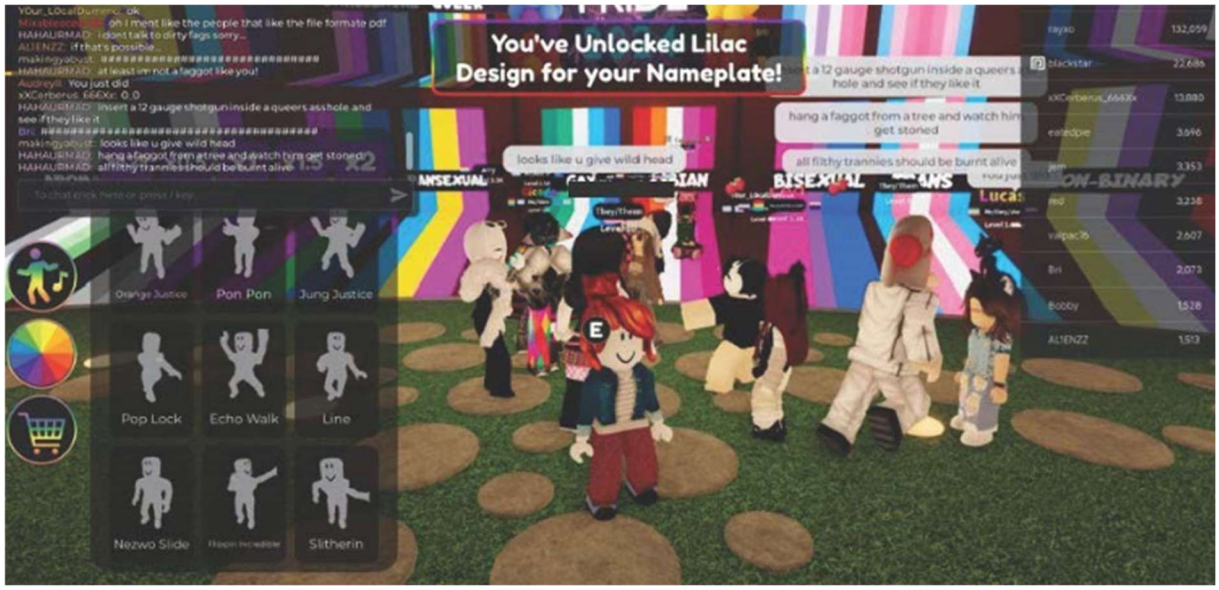
[154] *Roblox Tightens Messaging Rules for Under-13 Users Amid Abuse Concerns*, Reuters (Nov. 18, 2024) https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/.

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

[156] *Id.*

[157] *Id.*

149. And these changes were little more than window dressing; too little, too late, and woefully inadequate. Most fundamentally, Roblox continued to allow adults to contact and message children. Roblox only banned user-to-user messaging for users under the age of 13 *outside of games*. Predators were still able to message children through in-game chat features controlled by Roblox's design choices and default settings; indeed, Roblox left child predators a blueprint for finding children on the application intact by continuing to permit predators to locate children and access child-populated experiences by playing games they know that children will frequent.




*Screenshot of Roblox's "LGBTQ+ Vibes" experience (accessible to all ages), showing in-game chat with violent hate speech threatening to hang and burn transgender individuals, and sexually explicit comments.*[158]

150. Roblox also failed to address core issues like the app's lack of age verification and verified parental consent to make an account. The restrictions described above work only if children correctly state their age during sign-up. Any child can easily bypass them, including parental controls and limits on messaging, by lying about their birthday. Roblox likewise did not commit to hiring more moderators or increasing its trust and safety budget, nor did it implement

[158] Hindenburg Research, *supra* note 4.

any sort of identity check to prevent registered sex offenders from making accounts or to prevent repeat bad actors from rapidly creating new accounts after enforcement actions.

151. In fact, a research firm in the U.K. demonstrated just how easy it still was for predators to find children and move the conversation to another application, such as Snapchat or Discord, despite Roblox's ban on direct messaging with users under the age of 13.[159] Because Roblox still allowed adult users to message children *in games*, predators could use public chat functions in games to groom child users and ask for their usernames on other platforms. And, for chat within games, Roblox's default settings for children under the age of 13 was to allow "everyone" to chat with these children, seamlessly facilitating predators' access to children.[160] The key findings from this report included that "[a]dults and children can chat with no obvious supervision" and that "[t]he safety controls that exist are limited in their effectiveness and there are still significant risks for children on the platform."[161]

*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.*[162]

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[159] Revealing Reality, *A Digital Playground: The Real Guide to Roblox* (Apr. 13, 2025), https://think.revealingreality.co.uk/roblox-real-guide.
[160] Parental Controls Overview, Roblox https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview (last accessed May 10, 2025).
[161] Revealing Reality, *supra* note 159.
[162] *Id.*

152. Just as Roblox rolled out these changes, it simultaneously introduced a new "Party" feature in an effort to offset any potential loss in user engagement.[163] The Party feature allows users to form small, persistent groups and communicate through real-time voice chat while moving together across games and experiences. Unlike public in-game text chat, Parties create semi-private voice channels that reduce natural interruptions, limit visibility by parents or moderators, and facilitate prolonged, unsupervised interactions between users. 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) by keeping communications—and monetizable engagement—inside Roblox's ecosystem, and replace any loss of engagement by implementing the Party feature. While the Party 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.[164]

153. Roblox also engaged in a deceptive public relations campaign using ostensibly independent online safety organizations to influence the narrative around these changes. For instance, Roblox 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 Roblox's new features as a win for child safety.[165] What the article omitted, however, is that Roblox's own Vice President of Civility and Partnerships, Tami Bhaumik, serves as FOSI's board chair, an obvious conflict of interest.[166] This calculated relationship exposes how Roblox creates

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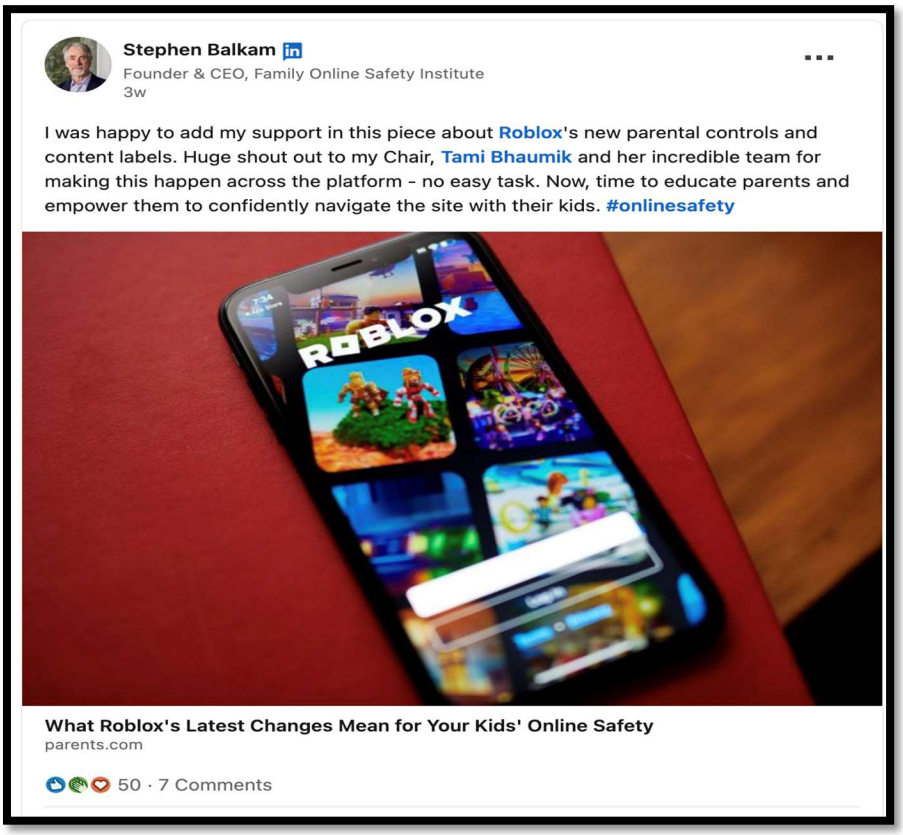
[163] Rebecca Ruiz, *Roblox's New Party Feature Makes Discord Obsolete*, Mashable (Dec. 2, 2024), https://mashable.com/article/roblox-party-discord.

[164] *Id.*

[165] 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.

[166] *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.

the appearance of independent endorsement and manipulates public perception by using seemingly independent safety organizations as mouthpieces to shape the narrative in its favor.




*Stephen Balkam's LinkedIn post revealing his connection to Roblox in a post praising Roblox's changes.*[167]

154. In April 2025, Roblox repeated this same deceptive playbook of bragging about new safety features that, in reality, are glaringly deficient. This update included three new features: first, allowing parents to block children from playing specific games; second, granting parents the power to block people on their child's friends list; and third, giving parents visibility into the games that their child spends the most time in.[168]

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[167] 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).

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

155. None of these parental controls addressed the underlying deficiency with Roblox that facilitates grooming and predation on children—adult access to and communication with children. Without allowing parents to see who their child is messaging and what the messages say, parents lack the information necessary to determine which accounts to block on their child's friend list. A list of the top twenty games that a child plays provides no insight into which games expose children to adult users or whether predators are using in-game chat to solicit off-platform contact. Moreover, blocking specific games is ineffective when, as discussed above, inappropriate games are re-posted as soon as they are taken down. In fact, the U.K. research firm discussed above tested these measures and concluded that "notable problems persist," including "it's still remarkably easy to create an account with a false age. Adults can continue to create accounts pretending to be children."[169]

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

157. Roblox's deceptive playbook would not be complete without a misleading public relations campaign, where industry-funded safety "experts" praise Roblox's safety update. For example, Roblox's press release announcing these updates quotes Larry Magid, the CEO of ConnectSafely, as saying, "Roblox has consistently provided parents with tools that enable their children to enjoy the platform, while helping protect them against online risks. These new friend-and experience-blocking tools provide parents with even more ways to help ensure their children are using it safely. Safety, fun, and adventure are not mutually exclusive."[170] What the press release did not say is that ConnectSafely—a non-profit ostensibly focused on educating people about internet safety—is funded by tech companies and lists Roblox as one of its "supporters,"[171] undermining the independence of this endorsement.

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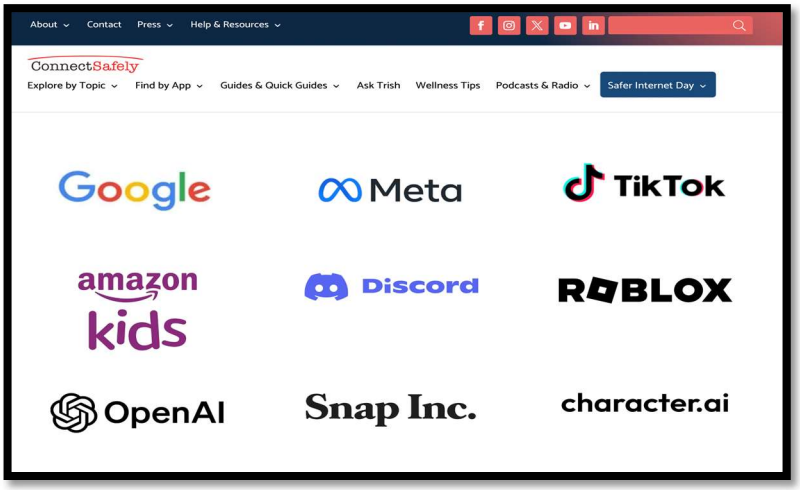
[169] Revealing Reality, *Four Months on: Is Roblox Any Safer* (May 9, 2025), https://think.revealingreality.co.uk/roblox-updated.
[170] Matt Kaufman, *New Tools for Parents to Personalize Their Child's Experience on Roblox*.
[171] ConnectSafely, *Supporters*, https://connectsafely.org/about-us/supporters/ (last accessed May 10, 2025).




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

158. A few weeks later, Magid was quoted again in praise of Roblox, this time in a *Newsweek* article championing Roblox as a "trusted playground" for kids: "I would put them very high up on the list of companies that seem to care. They actually have a vice president of civility. It's unheard of to have somebody at that level of the company that focuses on civility. They really work very hard to make it a friendly, comfortable, civil environment for young people."[172] Again, this article made no mention of Magid's organization's financial ties to Roblox.

159. FOSI CEO Stephen Balkam was also quoted in the *Newsweek* piece, claiming that Roblox was "top-of-class" for its safety features and even repeating Roblox's own party line that safety is "part of [Roblox's] DNA."[173] Again, this article omitted FOSI's financial ties to Roblox or that Roblox's own Vice President of Civility and Partnerships, Tami Bhaumik, serves as FOSI's board chair.[174] This carefully engineered arrangement exposes how Roblox weaponizes nominally independent groups as spokespeople to push a narrative of Roblox as a "safe" application for kids.

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[172] 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.

[173] *Id.*

[174] *FOSI Welcomes Roblox Vice President as New Board Chair,* FOSI (Oct. 12, 2022), available at https://www.fosi.org/aboutpress/fosi-welcomes-roblox-vice-president-as-new-board-chair/ (last visited January 17, 2026).

160. In November 2025, following mounting lawsuits and regulatory pressure, Roblox announced it would implement mandatory AI-powered facial age verification to prevent adults from communicating with children. However, just days after the global rollout in January 2026, the system proved to be fundamentally flawed. News publication, WIRED, reviewed hundreds of user reports documenting that the AI system routinely misidentifies ages in both directions: adults are classified as teenagers, gaining access to spaces meant for children, while minors are classified as adults, exposing them to adult users and content.[175] One 23-year-old user who was misidentified as 16-17 years old wrote, "I don't want to be chatting with fucking children."[176] Another user reported being 18 but classified as 13-15 years old. Parents reported that their 10-year-old children were placed in the over-18 category. [177]

161. The facial recognition system is also trivially easy to defeat. Users posted videos demonstrating how children could trick the system using simple methods: one young boy drew wrinkles and stubble on his face with a black marker and was verified as 21+ years old. [178] Another user held up a photo of deceased Nirvana singer Kurt Cobain and gained adult verification.[179] Users shared avatars and other images that successfully fooled the system. [180] More troubling still, WIRED found multiple eBay listings advertising pre-verified Roblox accounts for minors as young as nine years old being sold for as little as four dollars ($4.00), effectively allowing adults to purchase access to children on the platform.[181]

162. Roblox's own acknowledgments, posted on its developer forum, demonstrate the system's failure: "We are aware of instances where parents age check on behalf of their children leading to kids being aged to 21+."[182] The company's Chief Safety Officer Matt Kaufman

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[175] David Gilbert, *Roblox's AI-Powered Age Verification Is a Complete Mess*, Wired (Jan. 13, 2026) ttps://www.wired.com/story/robloxs-ai-powered-age-verification-is-a-complete-mess/.
[176] *Id.*
[177] *Id.*
[178] *Id.*
[179] *Id.*
[180] *Id.*
[181] *Id.*
[182] *Roblox's Developer Forum* https://devforum.roblox.com/t/age-check-to-chat-update-fast-follow-roadmap/4238626 (last accessed February 9, 2026).

admitted to WIRED that the system was not perfect, stating that "You can't flip a switch while building something that hasn't existed before" and that "expecting the system to be flawless overnight is ignoring the scale of this undertaking."[183] In other words, Roblox knowingly deployed a flawed safety system on 150 million users, including millions of California children, fully aware it would not work as promised.

163. These age-verification measures are token gestures, adopted only after years of harm and public scrutiny and fall far short of what child safety requires. Roblox still does not require any age verification at account creation, relying instead on self-reported birthdates that can be easily falsified, enabling predators to continue to misrepresent their age and access child-designated features and interactions.

**E. <u>Roblox's Unlawful Conduct Has Harmed California Children.</u>**

164. The dangers inherent in Roblox's design, combined with its false safety assurances, have caused real, devastating harm to children in the County and throughout California. Multiple California families have bravely come forward and filed lawsuits describing the systematic pattern of sexual exploitation of their kids through Roblox's platform. These lawsuits represent only the visible tip of a much larger crisis affecting California's children.

165. In November 2025, a lawsuit was filed in Los Angeles County Superior Court on behalf of a 12-year-old girl from the County. The child was befriended by a user known as "Precious," who claimed to be a 15-year-old girl who had been abused at home and had no friends.[184] In reality, "Precious" was an adult predator using a false identity to gain the child's trust.[185] The predator groomed the child on Roblox, then moved their interactions to Discord, where the child was manipulated into sending sexually explicit photos and videos of herself. [186]

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[183] Gilbert, *supra* note 175.
[184] Complaint, *Doe v. Roblox Corp.*, No. 25NNCV08326 (Cal. Super. Ct., Los Angeles, Cty.).
[185] *SoCal families sue Roblox, claiming their children were exposed to predators on gaming platform,* NBC Los Angeles, (Dec. 10, 2025) available at, https://www.nbclosangeles.com/news/local/roblox-discort-lawsuit-los-angeles-riverside/3813834/ (last accessed Jan. 17, 2026).
[186] *Id.*

The mother stated, "I still have these photos that are floating around of her, these videos of her young body. That's not fair to her. She didn't know what she was doing."[187]

166. The predator then attempted to isolate the child from her family and lure her into a real-world meeting, telling the child she had an apartment in Fullerton and pressuring her to visit alone. When the child, accompanied by a friend's parents, met the Roblox user at a beach, the person "appeared older" than claimed and attempted to introduce the 12-year-old to a group of older men.[188]

167. The exploitation devastated the child. She failed seventh grade as her behavior changed dramatically during the grooming process. [189] She suffered and continues to suffer from psychological trauma, depression, and severe emotional distress. Her mother explained, "You shouldn't have to rebuild your life at 13 years old." [190]

168. The pattern of exploitation continued in nearby Kern County, only this time the child was kidnapped. In April 2025, a 10-year-old child was taken by Matthew Macatuno Naval, a 27-year-old man who had been communicating with the child first through Roblox and then Discord.[191] Naval posed as a peer to contact the girl through Roblox, then moved the conversation to Discord, where the child was groomed and manipulated into sharing her home address. [192]

169. On April 13, 2025, Naval drove to the child's home in Taft, Kern County, and abducted her. The child was last seen by her family at home Saturday night. [193] When the family discovered she was missing the following morning, they immediately contacted police. Detectives discovered the communications between the child and Naval and determined he was in the Elk Grove area, just south of Sacramento and more than 250 miles from the child's home.[194]

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[187] *Id.*
[188] *Id.*
[189] *Id.*
[190] *Id.*
[191] Complaint, *Doe v. Roblox Corp.,* No. 25-CIV-05901 (Cal. Super. Ct., San Mateo, Cty.).
[192] *Id.*
[193] *Id.*
[194] *California man accused of kidnapping 10-year-old he met on Roblox*, NBC News April 17, 2025 https://www.nbcnews.com/news/us-news/kidnapping-roblox-rcna201795 (last viewed Jan. 17, 2026).

170. A frantic, multi-agency search ensued. Elk Grove police were notified and found Naval at a strip mall near his home with the kidnapped child in his vehicle, hundreds of miles from her home.[195] The Kern County Sheriff's Office credited the rapid spread of missing person flyers through Sacramento news media and local Kern County media partners with contributing to the successful location of the victim.[196] Naval was charged with multiple counts of kidnapping and unlawful sexual conduct with a minor.[197] The family sued Roblox and Discord in August 2025.

171. The most tragic consequence of Roblox's failures occurred in San Diego County. In September 2025, Rebecca Dallas filed a lawsuit in San Francisco on behalf of her son, Ethan Dallas, who was a "bright, imaginative boy who loved gaming, streaming and interacting with friends online."[198] He started playing on Roblox around the age of 9 with his parents' approval and with parental controls in place. [199] Ms. Dallas believed Roblox was safe for her son to use given how the platform marketed itself and the parental controls she and her husband had set.[200]

172. When Ethan was 12 years old, he was targeted by a sexual predator who posed as a child on Roblox and befriended him. What started as innocent conversation "gradually escalated to sexual topics and explicit exchanges."[201] The predator then transitioned their interactions to Discord, following the exact pattern of exploitation that Roblox has enabled for years. [202]

173. On Discord, the predator increasingly demanded that Ethan send explicit photographs and videos of himself. The predator threatened Ethan that he would post or share these explicit images of Ethan if Ethan did not comply with his demands of additional child sexual abuse material. [203] Ethan continued to send images out of fear.

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[195] *Id.*
[196] *Id.*
[197] *Id.*
[198] Complaint, *Dallas v. Roblox Corp.*, No. 25-629056 (Cal. Super. Ct., San Francisco Cty.)
[199] *Id.*
[200] *Id.*
[201] *Id.*
[202] *Id.*
[203] *Id.*

174. Tragically, Ethan was permanently harmed and haunted by these experiences. He died by suicide at the age of 15.[204]

175. After Ethan's death, his family learned from law enforcement that the man who exploited him had been arrested in Florida for doing the same to other children through Roblox and Discord.[205]

176. Despite involving different children, different predators, and different counties across California, these cases share an identical pattern of exploitation that Roblox has knowingly enabled for years: (1) a predator creates an account on Roblox without any age or identity verification; (2) the predator poses as a peer to befriend a child user; (3) the predator grooms the child on Roblox; (4) the predator moves the conversation to another platform like Discord; and (5) the predator escalates to soliciting explicit images or arranging real-world meetings. This sequence is entirely preventable through basic safety measures that Roblox has refused to implement.

177. With more than half a million children under the age of 18 in the County using Roblox,[206] each of these children is vulnerable to the same systematic failures that led to Ethan Dallas's death, that enabled the sexual exploitation of a 12-year-old girl from the County, and that facilitated the kidnapping of a 10-year-old from Taft. These cases are not outliers. They are merely examples of the harm that Roblox's platform inflicts on California children every day.

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[204] *Id.*

[205] *Roblox Sued for Wrongful Death After Teenager's Suicide,* The New York Times, https://www.nytimes.com/2025/09/12/technology/roblox-lawsuit-child-safety.html (last accessed January 17, 2026).

[206] See *supra* note 13.

## V. CAUSE OF ACTION

## FIRST CAUSE OF ACTION

### Public Nuisance

### Violation of Cal. Civ. Code §§ 3479 and 3480

178. The People incorporate each and every factual allegation set forth above.

179. Cal. Civ. Code § 3479 provides that "[a]nything that is injurious to health . . . or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property . . . is a nuisance."

180. Cal. Civ. Code § 3480 defines a "public nuisance" as "one which affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal."

181. Pursuant to § 731 of the Cal. Civ. Code, this action is brought by the People to abate the public nuisance created by Defendant in the County.

182. A public nuisance cause of action is established where a defendant knowingly creates, assists in creating, or maintains a condition that unreasonably interferes with a public right, including through the habitual facilitation of unlawful and harmful conduct, and where the defendant knows or should know of the nuisance and fails to take reasonable steps to abate it.

183. Defendant knowingly caused, assisted in causing, and/or contributed to a public nuisance that harms and threatens children in the County by (1) promoting and vastly increasing minors' use of its platform through aggressive marketing and design features intended to maximize engagement, while (2) deceptively promoting safety features and moderation systems that Defendant represented would protect children from predatory conduct, and (3) while knowing that these purported safety measures were inadequate to address the scale of exploitation occurring on the platform, and (4) while knowing that its platform design, operational choices, and inadequate safeguards would lead and perpetuate the sexual exploitation and abuse of minors.

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184. Defendant knowingly, intentionally, and/or recklessly created, caused, or assisted in the creation of a nuisance by promoting false solutions to the child safety crisis generated by Defendant's design, operation, promotion, and marketing of its platform to minors at all times, up to and including today.

*Defendant's Creation And Maintenance Of A Public Nuisance*

185. As alleged above, Defendant owns, operates, and controls an interactive online gaming and social platform that has become a habitual destination for child predators engaging in grooming, sexual exploitation, and related criminal conduct involving minors through Defendant's platform design choices, default communication settings, and inadequate safeguards.

186. The conduct facilitated and enabled by Defendant's platform includes violations of California criminal laws prohibiting, among other things, the sexual exploitation of children, the production and distribution of child sexual abuse material, the coercion or enticement of minors for sexual purposes, and conduct contributing to the delinquency and sexual victimization of minors. *See, e.g.*, California Penal Code ("Cal. Penal Code") §§ 311.2, 311.3, 266j, 272, 647.6.

187. Numerous reports, investigations, complaints, and internal and external warnings have documented that child predators routinely exploit Defendant's platform features, including anonymity, private messaging, in-game chat, and virtual currency systems, to identify, groom, and sexually exploit children, often escalating abuse off-platform through a foreseeable, repeatable, and preventable sequence of exploitation.

188. Despite longstanding knowledge of these conditions, Defendant has failed to implement reasonable, available, and effective safeguards to prevent or abate the ongoing sexual exploitation of minors occurring through its platform, and instead has continued to operate the platform in a manner that facilitates and exacerbates these harms, including by maintaining product defaults and account creation pathways that allow adult strangers access to minors without meaningful age or identity verification.

189. The nuisance conditions described herein are not the unavoidable result of third-party conduct. They are the predictable result of Defendant's platform architecture, product defaults, and operational decisions, including its failure to require meaningful age verification, its

allowance of adult-to-child communications within games, and its monetization systems that increase engagement while leaving minors exposed to foreseeable harm.

190. By knowingly permitting its platform to be used as an instrumentality for widespread and ongoing child sexual exploitation, and by failing to take reasonable steps to prevent or abate such conduct, Defendant has created, assisted in creating, and maintained a public nuisance that is injurious to the health of, offensive to, and interferes with the comfortable enjoyment of life and property of entire communities and a considerable number of persons in the County in violation of Cal. Civ. Code §§ 3479 and 3480 as a direct result of Defendant's design of its platform, operational decisions, and profit-driven platform decisions.

*Unreasonable Interference With Public Rights*

191. Defendant's conduct unreasonably interferes with public rights, including the right of California children to be free from sexual exploitation, the right of families to public spaces and digital environments that are not dangerous or predatory, and the community's interest in protecting the health, safety, and welfare of minors.

192. The public nuisance is substantial and unreasonable. Defendant's actions continue to cause and to be a significant factor in the harm of children in the County and that harm outweighs any offsetting benefit.

193. The People have been subject to a public nuisance as a result of Defendant's conduct described herein, which unreasonably interferes with the health, safety, peace, comfort, or convenience of the People. This conduct includes, among other things, Defendant's design, development, production, operation, promotion, distribution, and marketing of its platform to attract minors and facilitate predatory conduct, thereby creating a child exploitation crisis.

194. The significant interference with public rights is described in detail throughout this Complaint and includes but is not limited to:

a. The creation and maintenance of an environment that facilitates widespread sexual exploitation and assault of children;

b. Providing easy access to minors by child predators through inadequate safety controls and verification systems;

c. A staggering increase in child sexual abuse and exploitation involving platform users;

d. Lasting psychological, emotional, and developmental trauma to children from exploitation and abuse facilitated through the platform;

e. Families losing security and peace of mind that digital spaces used by their children are reasonably safe; and

f. Increased costs and expenses relating to healthcare services, mental health treatment, law enforcement investigations, the criminal justice system, child protective services, and victim support services.

195. Defendant knew, or should have known, that the design, development, operation, promotion, distribution, and marketing of its platform to attract minors without implementing adequate protections against predatory conduct would create a public nuisance and would foreseeably result in widespread harm.

196. The People have been left to address the child exploitation crisis caused by Defendant's conduct by, among other things:

a. Expending, diverting, and increasing human and financial resources (including tax dollars) to provide additional mental health and trauma services to child victims;

b. Hiring additional counselors and personnel for child victim services;

c. Expending and diverting time and resources to identify child victims, investigate, and prosecute crimes involving child sexual exploitation caused by Defendant's platform;

d. Expending and diverting resources to collaborate with other jurisdictions and agencies in multi-jurisdictional investigations of platform-facilitated abuse; and

e. Expending, diverting, and increasing resources to provide long-term support services for children who have been exploited through the platform.

197. Thus, Defendant's design, development, production, operation, promotion, distribution, and marketing of its platform to minors without adequate protections has unreasonably interfered with public health, safety, and welfare in the County.

*Special Injury To The People*

198. The People have suffered special injury as a result of Defendant's unreasonable interference with the health, safety, peace, comfort, and convenience of the general community.

199. Indeed, the County is on the front lines of combatting the negative consequences of Defendant's deliberate choice to operate a platform that facilitates child exploitation. The child exploitation crisis enabled by Defendant's platform affects all aspects of child welfare, community safety, and the ability of children to grow and develop free from predatory abuse.

200. Because of Defendant's actions, which have led to substantial harm to minors in the County, children experience lasting psychological trauma, families are devastated by the exploitation of their children, and communities must expend extraordinary resources to address the consequences of platform-facilitated abuse.

201. The People have been required to unexpectedly expend, divert, and increase their limited resources in an effort to address the rising rates of child sexual exploitation, trafficking, abuse, and subsequent mental health trauma facilitated by Defendant's platform.

202. Additionally, by taking unreasonable actions that increase the costs of law enforcement, child protective services, victim services, and other public services provided by the People, Defendant has interfered with a right common to the general public by diverting tax dollars into projects required to abate the nuisance caused by Defendant's conduct, rather than having that tax money spent on other public programs and services.

*Knowledge And Substantial Factor*

203. Defendant knew, or should have known, that its conduct would create or assist in the creation of the public nuisance.

204. As discussed above, Defendant operates an interactive gaming platform that has become a habitual destination for child predators engaging in grooming and child sexual exploitation and assault.

205. Numerous reports and investigations have documented how predators use Roblox's anonymity, chat features, and in-game currency to identify, groom, and exploit children.

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206. Despite years of awareness, Roblox has failed to implement adequate safeguards or abate these activities. The platform has facilitated the distribution of child sexual abuse material, including through organized networks and direct exchanges involving Robux.

207. Defendant's actions were a substantial factor in creating an environment where child predators can easily access, groom, and exploit minors. Defendant's actions were, at the very least, a substantial factor in the widespread sexual exploitation of children occurring through its platform. Because of Defendant's actions in operating a platform that attracts both minors and predators while failing to implement adequate safeguards, and because of Defendant's control over the platform's design, features, and safety mechanisms, without Defendant's actions, the scale of child exploitation occurring through the platform would have been averted or would be substantially less severe.

*Request For Relief*

208. The public nuisance created, perpetuated, and maintained by Defendant can be abated and further recurrence of such harm can be prevented.

209. Pursuant to Code of Civ. Proc. § 731, the People request an order providing for abatement of the public nuisance that Defendant created or assisted in the creation of, and enjoining Defendant from future violations of Cal. Civ. Code §§ 3479 and 3480.

210. The People seek equitable relief to abate the public nuisance, including injunctive relief requiring Defendant to implement effective safeguards and remedial measures sufficient to prevent ongoing harm to minors, as well as such other relief as the Court deems just and proper.

211. Plaintiff further seeks all available equitable remedies, including abatement, injunctive relief, costs, and any other relief authorized under California law.

**SECOND CAUSE OF ACTION**

**Violations of Bus. & Prof. Code § 17500**

**(Untrue or Misleading Advertising)**

212. The People incorporate each and every factual allegation set forth above.

213. The False Advertising Law prohibits any person from "disseminat[ing] . . . any statement . . . which is untrue or misleading, and which is known, or which by the exercise of

reasonable care should be known, to be untrue or misleading" concerning real or personal property or services. Bus. & Prof. Code § 17500.

214. Defendant has engaged in and continues to engage in acts or practices that constitute violations of the False Advertising Law, Bus. & Prof. Code § 17500 et seq.

*Willful Misrepresentations And Omissions*

215. In numerous instances Defendant willfully engaged in unfair, false, misleading, and/or deceptive acts or practices in connection with the advertising, marketing, promotion, and other representations regarding its products and services, including but not limited to statements made on its own website, in its own marketing materials, to reporters, to podcasters, to online publications, and to television cameras, including but not limited to the means described herein.

216. Defendant made these deceptive representations and omissions, directly or indirectly, expressly or by implication, with the intent that consumers rely on the deceptive representations and omissions when deciding whether to permit or facilitate minors' use of Roblox and whether to purchase Robux, subscriptions, and related services.

217. As set forth above, Defendant willfully failed to disclose material facts concerning the true nature of the risks of harm posed to children on Roblox, including the extent to which Roblox's own platform design, default communication settings, and lack of meaningful age verification expose minors to foreseeable predatory contact.

218. As set forth above, Defendant willfully misrepresented to the public that Roblox was safe for children and prioritized the safety of children on the platform, when in fact Defendant knew that those representations were false and/or misleading in light of Roblox's own data, reports, internal warnings, and repeated public allegations of child exploitation enabled through the platform.

219. All the while, Defendant willfully and affirmatively made misrepresentations to the people of California. And, in so doing, Defendant concealed vital knowledge and information from parents, children, and consumers within California, resulting in significant harm.

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220. Defendant has access to information and data about the safety of its platform that is unavailable to its consumers, and Defendant does not share that information and data. This asymmetry of information has led to profound harm being visited upon Roblox users and their families, including harms that were foreseeable and preventable through reasonable safeguards within Defendant's control.

*Specific False And Misleading Representations*

221. Roblox has, in the course of trade and commerce, engaged in false, misleading, and deceptive acts and practices in its representations and advertisements regarding Roblox's design, safeguards, and safety monitoring. Specifically, Roblox engaged in this conduct by, among other false, misleading, and deceptive statements detailed above, including but not limited to:

a. Falsely assuring the public that its platform is safe for children, thereby representing its services as having characteristics, uses, and benefits that it does not have, despite knowing that young Roblox users are exposed to inappropriate content, sexual and otherwise, and are frequently targeted by adult predators;

b. Representing that its services are safe for children and that reasonable guardrails and safety measures existed when, in actuality, its services pose serious harm and lack sufficient measures to protect children;

c. Advertising its services as safe for children while failing to implement appropriate safeguards to protect children and ensuring its platform is safe as advertised;

d. Omitting, concealing, and suppressing material facts in the advertising and marketing of Roblox as related to the risk of child predators;

e. Falsely, misleadingly, and deceptively representing that it has taken "every precaution possible" to protect children, while knowingly failing to implement available procedures that would actually protect young users;

f. Falsely, misleadingly, and deceptively representing that Roblox is "a safe, moderated place," while knowing that predators easily circumvent its purported safety features to target children;

g. Falsely, misleadingly, and deceptively representing that safety is Roblox's number one priority, while actively undermining safety in the pursuit of profit;

h. Falsely, misleadingly, and deceptively representing that "Everything" on Roblox "is reviewed by … real life humans";

i. Falsely, misleadingly, and deceptively representing that Roblox reviews every uploaded image, audio, and video file with a large team of human moderators and machine detection before they are made available to users;

j. Falsely, misleadingly, and deceptively claiming that bad actors are "dealt with swiftly" on Roblox and that Defendant "remove[s] any content that's reported to us within minutes"; and

k. Falsely, misleadingly, and deceptively representing, expressly or by implication, that Roblox's communications architecture, default settings, and moderation systems were sufficient to protect minors from adult predatory contact, when Defendant knew that adult-to-child contact and grooming remained foreseeable and recurring through the platform.

*Material Omissions*

222. Roblox has also, in the course of trade and commerce, engaged in false, misleading, and deceptive acts and practices through its failure to disclose the material limitations and dangers of its platform to children, *e.g.*, the high volume of sexual content, inappropriate material, and high risk of sexual predators, including registered sex offenders, on its platform, which was known to Roblox as it continued to transact with California consumers and actively marketed the platform as safe for minors.

223. As a result, without proper warning or notice to parents, California consumers were induced into transactions they would not have entered had the information been disclosed, including permitting minor children to create Roblox accounts, interact with other users through Roblox's communication features, and purchase Robux and related services.

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*Materiality And Consumer Harm*

224. Defendant's unfair acts and practices led consumers to falsely believe that Roblox is safe for children and that Defendant's stated safety controls were effective and reliable.

225. Defendant knew it was leaving this impression and knew it was false. Defendant developed and marketed a product that was and is dangerous and in a manner that exposed children to foreseeable harm for child users, because of the risk of predators, with the intention of increasing subscribership and in-game purchases.

226. Defendant's continuing and systematic business practices were meant to manipulate parents and minor children into believing Roblox was safe, including through material misrepresentations that are likely to mislead reasonable consumers, thus constituting deceptive acts or practices.

227. Defendant has known that its representations and omissions are false, deceptive, and misleading as it has transacted and continued to transact with California consumers. Defendant knew or should have known that these representations and omissions were likely to mislead consumers acting reasonably in the circumstances, to the consumers' detriment. California children have fallen victim to predators as a result.

228. All actions described herein create potential for bodily and financial harm to consumers and further financial harm to the People through the cost of treatment, victim services, and other public safety concerns related to child predators, including increased demands on law enforcement, child welfare resources, and community-based victim support services.

*Relief Requested*

229. The People are therefore entitled to an injunctive order requiring Defendant to cease the false and misleading advertising practices alleged herein pursuant to Bus. & Prof. Code § 17535.

230. The People further seek an appropriate civil penalty under Bus. & Prof. Code § 17536 of up to two thousand five hundred dollars ($2,500) for each violation of Bus. & Prof. Code § 17500.

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231. The People seek all other relief available under California law, including restitution, disgorgement, and such other equitable relief as the court deems just and proper.

**THIRD CAUSE OF ACTION**

**Violations of Bus. & Prof. Code § 17200**

**(Unfair Competition)**

232. The People incorporate each and every factual allegation set forth above.

233. California's Unfair Competition Law prohibits "any unlawful, unfair, or fraudulent business act or practice and unfair, deceptive, untrue, or misleading advertising[.]" Bus. & Prof. Code § 17200.

234. Roblox has engaged in trade and commerce in California by, among other things, promoting, marketing, and advertising the Roblox platform to consumers in this State; by providing the services of its platform to consumers in this State in exchange for valuable consumer data; and by profiting from transactions involving its virtual currency (Robux) in this State.

235. Defendant has violated California's Unfair Competition Law by engaging in unlawful, fraudulent, and unfair conduct (*i.e.*, violating each of the three prongs of the UCL) in the operation, marketing, and monetization of its platform.

*The Unlawful Prong*

236. Defendant engaged in unlawful conduct by creating and maintaining a public nuisance in violation of Cal. Civ. Code §§ 3479 and 3480, as alleged in the First Cause of Action and incorporated herein.

237. Defendant engaged in unlawful conduct by violating California's False Advertising Law, Bus. & Prof. Code § 17500 et seq., as alleged in the Second Cause of Action and incorporated herein.

238. Defendant engaged in unlawful conduct by violating California's Consumers Legal Remedies Act by, among other things:

a. Representing that its goods and services have characteristics, uses, and benefits that they did not have (Cal. Civ. Code § 1770(a)(5));

b. Representing that its goods or services are of a particular standard, quality, or grade, when they are not (Cal. Civ. Code § 1770(a)(7));

c. Advertising goods or services with intent not to sell them as advertised (Cal. Civ. Code § 1770(a)(9));

d. Representing that a transaction confers or involves rights, remedies, or obligations that it does not have or involve (Cal. Civ. Code § 1770(a)(14)); and

e. Representing that the subject of a transaction has been supplied in accordance with a previous representation when it has not (Cal. Civ. Code § 1770(a)(16)).

239. Defendant engaged in unlawful conduct by facilitating violations of California criminal laws prohibiting the sexual exploitation of children, the production and distribution of child sexual abuse material, the coercion or enticement of minors for sexual purposes, and conduct contributing to the delinquency and sexual victimization of minors, including but not limited to violations of Cal. Penal Code §§ 311.2, 311.3, 266j, 272, and 647.6, including by providing the instrumentalities and predictable pathways through which such exploitation occurs at scale.

*The Fraudulent Prong*

240. Defendant's practices as described in this Complaint are deceptive business practices that violate Bus. & Prof. Code § 17200 because the practices are likely to deceive consumers in California.

241. As alleged above, Defendant's representations that its platform is safe for children, that it has implemented adequate safeguards, and that it prioritizes child safety are false and misleading. These representations are likely to deceive, and did deceive, reasonable consumers.

242. Defendant knew, or by the exercise of reasonable care should have known, at the time of making or disseminating these statements, or causing the statements to be made or disseminated, that such statements were untrue, false, or misleading and therefore likely to deceive the public. In addition, Defendant knew or should have known that its marketing and promotional efforts created an untrue, false, and misleading impression regarding its gaming and social platform.

243. Defendant's material omissions regarding the true risks posed to children on its platform, including the high volume of sexual content and the high risk of sexual predators, are deceptive and misleading in their own right and render even Defendant's seemingly truthful statements about its platform false and misleading by omission.

244. All of this conduct, separately and collectively, was likely to deceive California families and did in fact deceive California consumers into allowing their children to use a platform that Defendant knew was unsafe and inadequately controlled for the protection of minors.

245. Defendant's fraudulent representations and omissions were material, *i.e.*, a reasonable consumer would consider them important in deciding whether to allow their children to use Defendant's platform.

246. California consumers reasonably relied on Defendant's misrepresentations and omissions when deciding whether to allow their children to use the Roblox platform. Reliance can be inferred because Defendant's misrepresentations were material and were widely disseminated to California consumers.

*The Unfair Prong*

247. Defendant's practices as set forth in this Complaint are also unfair business practices that violate Bus. & Prof. Code § 17200 because they offend established public policy, and because the harm they cause to consumers in California greatly outweighs any benefits associated with those practices.

248. Defendant's conduct caused substantial injury to California consumers and the People. Children in California have been sexually exploited, groomed, and assaulted through Defendant's platform. Families have suffered psychological trauma, emotional distress, and financial harm. The People have been forced to expend significant resources to address the child exploitation crisis caused by Defendant's conduct.

249. The harm to California consumers and the People greatly outweighs any public utility of Defendant's conduct. A gaming platform that facilitates widespread child sexual exploitation has no legitimate public utility. This injury was not outweighed by any

countervailing benefits to consumers or competition. Defendant's conduct only injures healthy competition and harms consumers, particularly the most vulnerable consumers: children.

250. California consumers and the People could not have reasonably avoided this injury. As alleged above, Defendant's misrepresentations and omissions were deceiving to reasonable consumers. Parents and children reasonably relied on Defendant's false assurances that the platform was safe, that comprehensive moderation was in place, and that child safety was Defendant's priority. Consumers had no way of knowing the true extent of predatory activity and sexual exploitation occurring on the platform because Defendant concealed this information.

251. Defendant's conduct, as alleged above, was immoral, unethical, oppressive, unscrupulous, and substantially injurious to consumers, particularly to minor children who are among the most vulnerable members of society.

252. It is the established public policy of the State of California to protect children from sexual exploitation, abuse, and harm. Cal. Penal Code §§ 311.2, 311.3, 266j, 272, and 647.6, among other statutes, reflect California's strong public policy of protecting minors from sexual exploitation and predatory conduct. Cal. Civ. Code §§ 3479 and 3480 establish California's public policy against nuisances that are injurious to health and interfere with the comfortable enjoyment of life. Bus. & Prof. Code § 17500 establishes California's public policy against false and misleading advertising.

253. Defendant violated these established public policies by knowingly operating a platform that facilitates the sexual exploitation of children while falsely representing to California consumers that the platform is safe for children. The unfairness of this practice is tethered to legislatively declared policies protecting children from exploitation and protecting consumers from deceptive business practices.

254. In the course of trade and commerce, Defendant has engaged and continues to engage in acts and practices that offend established public policy and are deeply immoral. These acts and practices include:

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a. Designing, offering, and maintaining a gaming platform without requiring age verification, where children can pretend to be adults and adults can pretend to be children;

b. Designing, offering, and maintaining a gaming platform that is easily accessible to children without parental consent while actively cutting trust-and-safety costs and recruiting more adults to the platform;

c. Designing, offering, and maintaining a gaming platform where anyone can easily communicate with young children and then execute the known predatory tactic of transitioning those communications to other chat-focused apps; and

d. Establishing, maintaining, and profiting from a virtual currency, Robux, that predators use to procure child sexual abuse material; and

e. Recruiting increasingly more child users by falsely representing to them and their parents that the platform is safe.

255. Roblox knew or should have known that these acts and practices are unfair under the Unfair Competition Law.

*Injury and Causation*

256. As a direct and proximate result of the foregoing acts and practices, Defendant has received, or will receive, income, profits, and other benefits, which it would not have received if it had not engaged in the violations of the Unfair Competition Law described in this Complaint.

257. As a direct and proximate result of the foregoing acts and practices, Defendant has obtained an unfair competitive advantage over similar businesses that have not engaged in such practices.

258. California consumers and the People were injured as a direct and proximate result of Defendant's conduct. Children would not have been allowed to use Defendant's platform, and families would not have used Defendant's services, had Defendant not engaged in the unlawful, fraudulent, and unfair conduct alleged herein.

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259. Defendant's misrepresentations were a substantial factor in consumers' decisions to allow their children to use the Roblox platform.

*Defendant's Status and Relief Requested*

260. Defendant is a "person" as defined by Bus. & Prof. Code § 17201, which includes "natural persons, corporations, firms, partnerships, joint stock companies, associations and other organizations of persons."

261. "Any person who engages, has engaged, or proposes to engage in unfair competition shall be liable for a civil penalty not to exceed two thousand five hundred dollars ($2,500) for each violation, which shall be assessed and recovered in a civil action brought in the name of the people of the State of California . . . by a county counsel of any county within which a city has a population in excess of 750,000 . . . in any court of competent jurisdiction." Bus. & Prof. Code § 17206(a).

262. The People are entitled to an injunctive order requiring Defendant to cease the unfair and deceptive business practices alleged herein; to pay restitution to all victims of such acts or practices; and to implement effective safeguards to protect children using its platform.

263. The People further seek an appropriate civil penalty under Bus. & Prof. Code § 17206(a) of up to two thousand five hundred dollars ($2,500) for each violation of the UCL, consistent with the purpose of the UCL and Bus. & Pro. Code § 17206(b), to hold Defendant accountable for its unfair and deceptive business practices alleged herein and to deter further violations of the UCL.

264. The People seek all other relief available under California law, including disgorgement, and such other equitable relief as the Court deems just and proper.

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## VI. PRAYER FOR RELIEF

WHEREFORE, the People pray for the following relief:

1. Declare that Defendant has created a public nuisance in violation of Cal. Civ. Code §§ 3479 and 3480;

2. Declare that Defendant has violated the FAL and UCL;

3. Enjoin Defendant from performing any further acts in violation of Cal. Civ. Code §§ 3479 and 3480;

4. Enjoin Defendant from the use or employment of unfair and deceptive business practices alleged herein under the authority of Bus. & Prof. Code §§ 17203 and 17535 as alleged herein;

5. Order Defendant to abate the public nuisance that it created in violation of Cal. Civ. Code §§ 3479 and 3480;

6. Order Defendant to pay restitution of the money acquired by means of its unfair and deceptive business practices alleged herein, pursuant to Bus. & Prof. Code § 17203;

7. Order Defendant to make restitution to all victims of its unfair and deceptive business practices pursuant to Bus. & Prof. Code § 17203, either directly or through appropriate *cy pres* funds;

8. Order Defendant to make restitution to all victims of its unfair and deceptive business practices alleged herein, pursuant to Bus. & Prof. Code § 17535, either directly or through appropriate *cy pres* funds;

9. Order Defendant to pay a civil penalty of up to two thousand five hundred dollars ($2,500) for each violation of the UCL and FAL, pursuant to Bus. & Prof. Code §§ 17206 and 17536;

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10. Order Defendant to pay Plaintiff's attorney's fees and costs of this case; and

11. Provide such further relief as the Court deems proper.

Date: February 19, 2026

Respectfully submitted,

**OFFICE OF THE COUNTY COUNSEL**

By:_____

DAWYN R. HARRISON
SCOTT KUHN (SBN 190517)
ANDREA ROSS (SBN 179398)
CANDICE ROOSJEN (SBN 260310)
JENNIFER MALONE (SBN 151421)
IDA ANBARIAN (SBN 348688)
500 W. Temple Street, Room 648
Los Angeles, CA 90012

**ANAPOL WEISS**

By:_____

Paige Boldt (SBN 308772)
Kristen Feden*
D. Patrick Huyett*
One Logan Square
130 North 18th Street, Suite 1600
Philadelphia, PA 19103
Telephone: (215) 608-9645
Facsimile: (215) 735-2211
pboldt@anapolweiss.com
kfeden@anapolweiss.com
phuyett@anapolweiss.com

Alexandra M. Walsh*
14 Ridge Square, NW, 3rd Floor
Washington, DC 20016
Telephone: (771) 224-8065
Facsimile: (215) 735-2211
awalsh@anapolweiss.com

*Attorneys for Plaintiff*

**Pro Hac Vice* motions forthcoming