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19 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
20 **COUNTY OF SAN MATEO**

Case No.: 25-CIV-03864

21 JANE DOE, a minor, represented by her
22 proposed court-appointed guardian *ad*
litem, MARY DOE,

23 Plaintiff,

24 v.
25

26 ROBLOX CORPORATION and DOES 1-
27 50, inclusive,

28 Defendants.

COMPLAINT FOR DAMAGES

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

JURY TRIAL DEMANDED

Electronically
FILED
by Superior Court of California, County of San Mateo
ON 5/19/2025
By /s/ Carl Saffold
Deputy Clerk

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1 Plaintiff Jane Doe, a minor, represented by her proposed guardian *ad litem* Mary Doe
2 (“Plaintiff”), brings this action against Roblox Corporation (“Roblox” or “Defendant”) and Does
3 1-50 to recover damages arising from the severe injuries she suffered because of Roblox’s conduct
4 in creating, designing, marketing, and distributing its mobile- and web-based application (“app”),
5 and alleges as follows:

6 **I. INTRODUCTION**

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

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

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

24 4. Plaintiff was an avid user of Roblox who relied heavily on the app for social
25 interaction, making her a prime target for the countless child predators that Roblox knew were
26

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

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

6 5. The predator posed as a 16-year-old boy, initially engaging in innocent
7 conversations but gradually escalating to sexual topics and sexual exchanges. He was then able to
8 use the app to convince Plaintiff to create an account on another online platform, where he escalated
9 his predation to an even more disturbing level, convincing her to send him sexually explicit images
10 of herself. Ultimately, he coerced Plaintiff into leaving her home in Indiana and traveling with him
11 to Georgia, where he had vaginal intercourse with her multiple times while refusing to allow her to
12 call her mother. Plaintiff finally managed to escape and find her way to a local police station.

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

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

1 **II. PARTIES**

2 **A. Plaintiff**

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

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

11 10. Plaintiff was a minor at the time of using Roblox's app and, as such, lacked the legal
12 capacity to enter into any binding agreement. To the extent Roblox claims any contract has any
13 effect on Plaintiff's rights in this action, such an assertion is legally erroneous, invalid, and
14 unenforceable because Plaintiff disaffirms any such contract, including any contract containing a
15 forced arbitration agreement and any delegation clause in any contract.

16 **B. Defendants**

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

22 12. The true names or capacities, whether individual, corporate, or otherwise, of
23 Defendants DOES 1 through 50, inclusive, are unknown to Plaintiff who is therefore ignorant of
24 their true names and sues said Defendants by such fictitious names. Plaintiff believes and alleges
25 that each of the Defendants designated herein by fictitious names is in some manner legally
26 responsible for the events and happenings herein referred to and caused damages proximately and
27 foreseeably to Plaintiff as alleged herein.

1 **III. JURISDICTION AND VENUE**

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

5 14. Venue is proper in this Court because this Complaint seeks damages arising and
6 resulting from the acts and omissions of Roblox that caused the injuries complained of herein, and
7 the County of San Mateo is Roblox’s county of residence and the location of its principal place of
8 business.

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

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

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

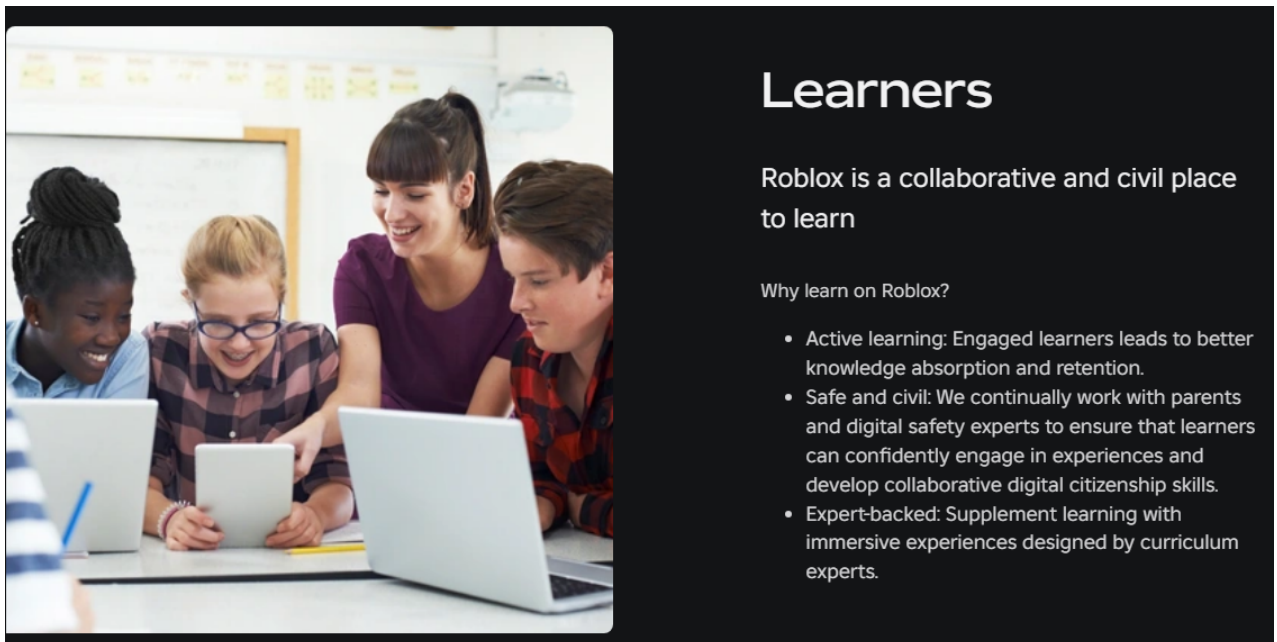
16 16. Roblox is easily accessible, including to children. It is free to download and play and
17 is available on gaming consoles, computers, tablets, and cellular devices.

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

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

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

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



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

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

22 20. That growth has continued unabated. In Roblox’s 2023 Annual Report, the company
23 reported an average of 68.5 million daily active users, with 21% under 9 years of age; 21% from 9-
24

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

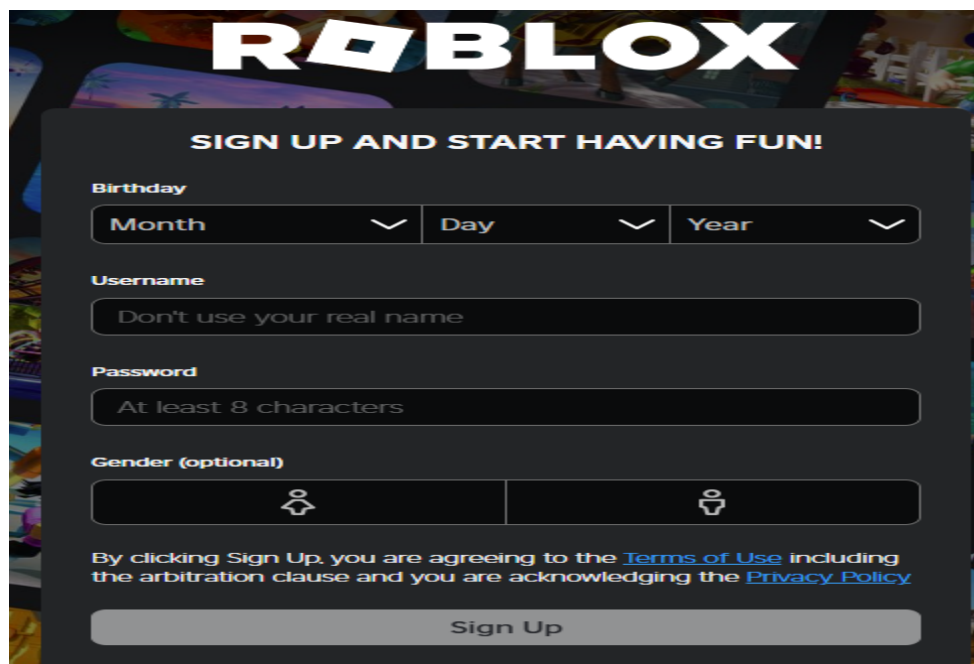
27 ⁵ Roblox, *A New Era of Engaged Learning*, <https://corp.roblox.com/education> (last visited Feb.
28 11, 2025).

⁶ *Id.*

12 years of age; 16% from 13-16 years of age; and 41% over 17 years of age.

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

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

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

Roblox Sign-up Screen

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

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

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



9
10 *Example default avatar on Roblox.*

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



23 *Examples of games available on Roblox.*

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

28 27. Now, under Roblox’s default settings, adults cannot directly message children under

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

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

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

17 **B. Roblox Lures Parents into Letting Their Kids Use Roblox with Promises of**
18 **Safety.**

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

23 31. Over the years, Roblox has repeatedly represented on its website that its app is safe
24 for children and has touted the safety controls it has in place. As early as 2007, Roblox’s website
25 assured parents that Roblox is an “online virtual playground . . . where kids of all ages can safely
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27 ⁸ Olivia Carville & Cecilia D’Anastasio, *Roblox’s Pedophile Problem*, Bloomberg Businessweek
28 (July 23, 2024), <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/>.

1 interact, create, have fun, and learn.”⁹

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

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

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

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

28 ¹¹ *Id.*

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

¹³ *Id.*

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



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

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

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

28 ¹⁵ *Id.*

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

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

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

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

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

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

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

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

25 ¹⁹ Roblox, *Safety Features: Chat, Privacy & Filtering*, [https://en.help.roblox.com/hc/en-](https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%2000than%20younger%20players)
26 [us/articles/203313120-Safety-Features-Chat-Privacy-](https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%2000than%20younger%20players)
Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%2000tha
n%20younger%20players (last visited Feb. 11, 2025).

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

²¹ *Id.*

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

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

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

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

Parents

13
14
15 In response to safety concerns, Roblox notes that the platform was
16 designed for kids and teens from the beginning, and they're committed to
17 making safety a priority. "We have a responsibility to make sure our players
18 can learn, create, and play safely," notes Tami Bhaumik, Vice President of
19 Civility & Partnerships at Roblox. "This continues to be our most important
20 priority and that will never change."

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

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

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

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

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

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

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

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

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

25 ²⁷ *Id.*

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

28 ²⁹ *Id.*

³⁰ *Id.*

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

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

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

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

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

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

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

23 ³³ *Id.*

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

26 ³⁵ *Id.*

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

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

³⁸ Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety*
Features, Past Cases of Child Abuse on the Platform, WBUR (Nov. 18, 2024),
<https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features>.

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

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

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

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

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

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

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

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

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

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

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

26 ⁴¹ *Id.*

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

⁴³ Hindenburg, *supra* note 1.

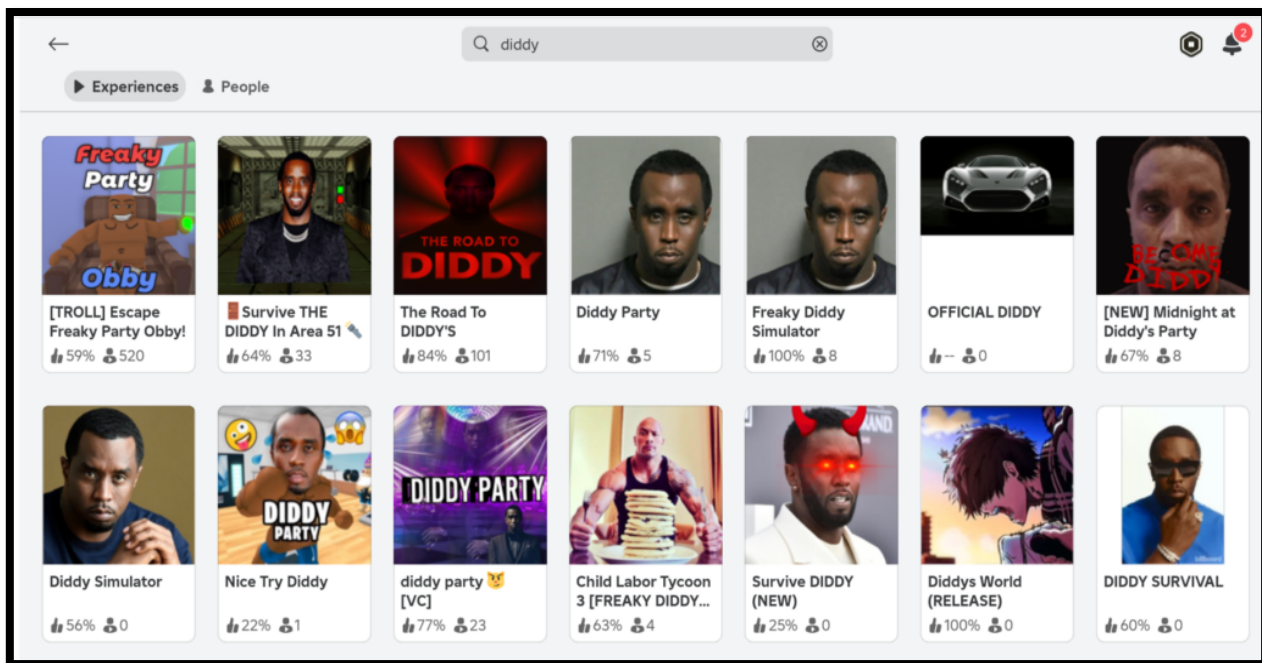
⁴⁴ Dickson, *supra* note 42.



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

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

⁴⁵ Hindenburg Research, *supra* note 1.



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

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



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

⁴⁶ *Id.*

⁴⁷ *Id.*

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

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

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

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

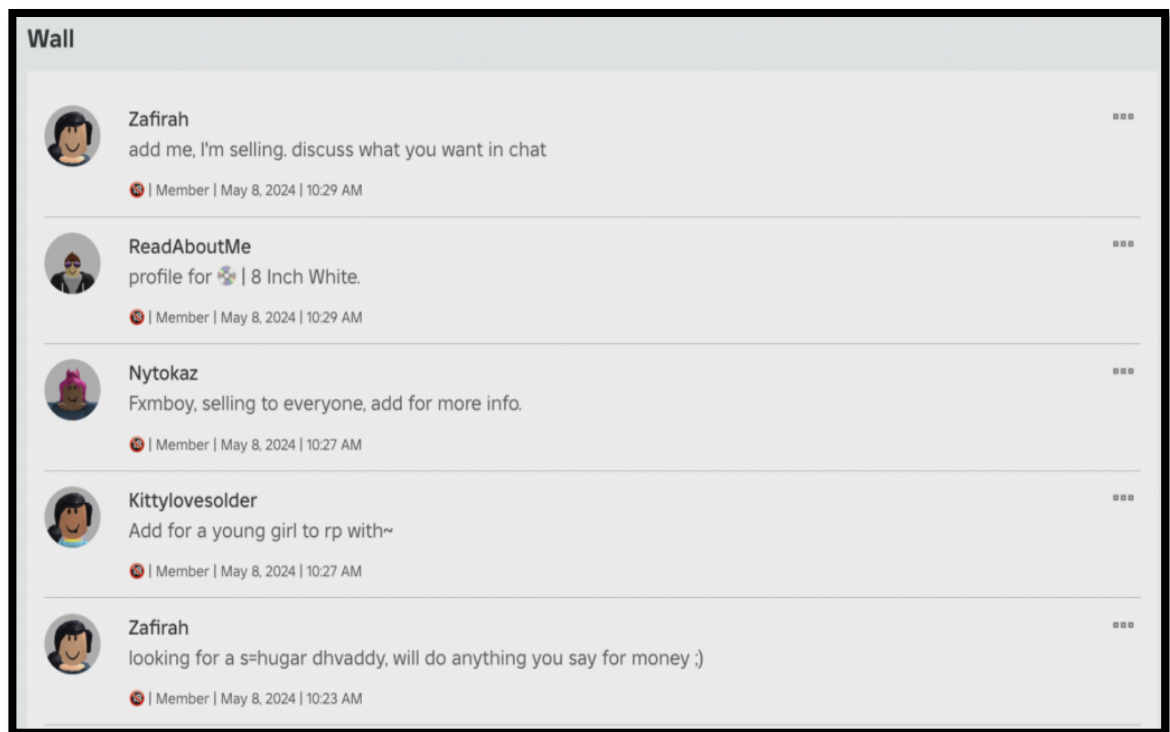
24
25 ⁴⁸ Joseph Cox & Emanuel Malberg, *Leaked Documents Reveal How Roblox Handles Grooming*
26 *and Mass Shooting Simulators*, Vice (Aug. 1, 2022), [https://www.vice.com/en/article/leaked-](https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/)
[documents-how-roblox-moderates-content-mass-shootings-grooming/](htt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

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

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

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

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



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

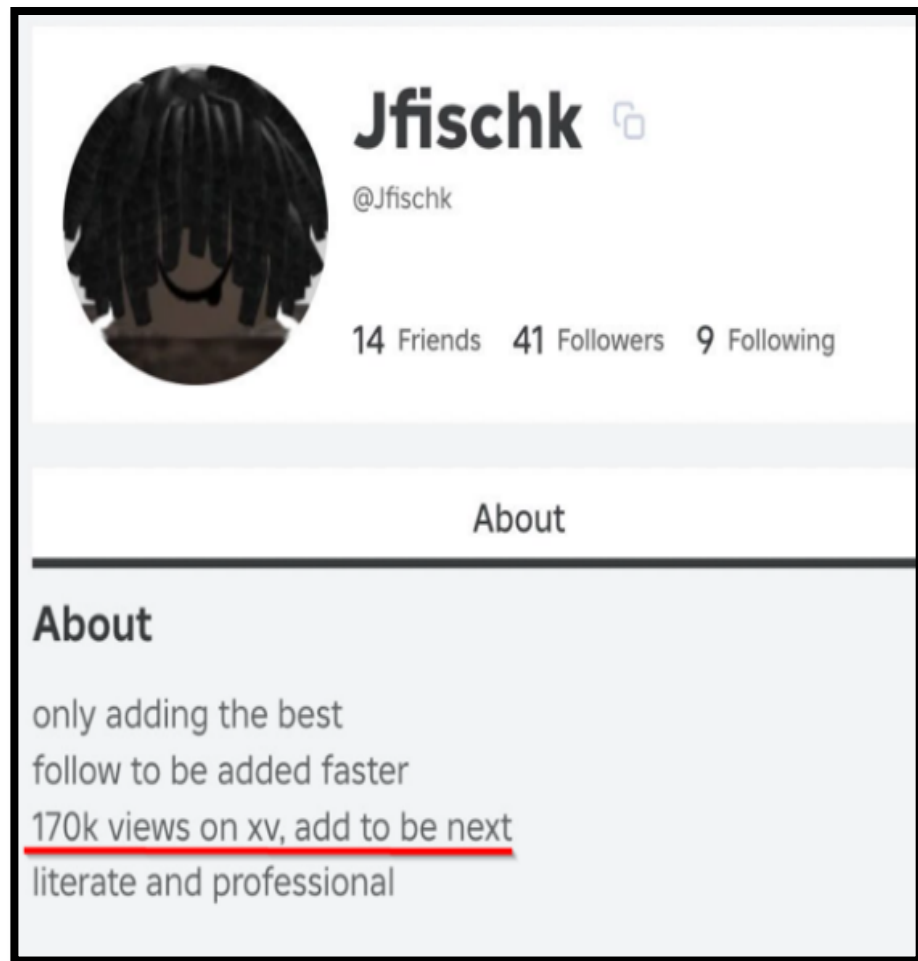
26 ⁵¹ Hindenburg Research, *supra* note 1.

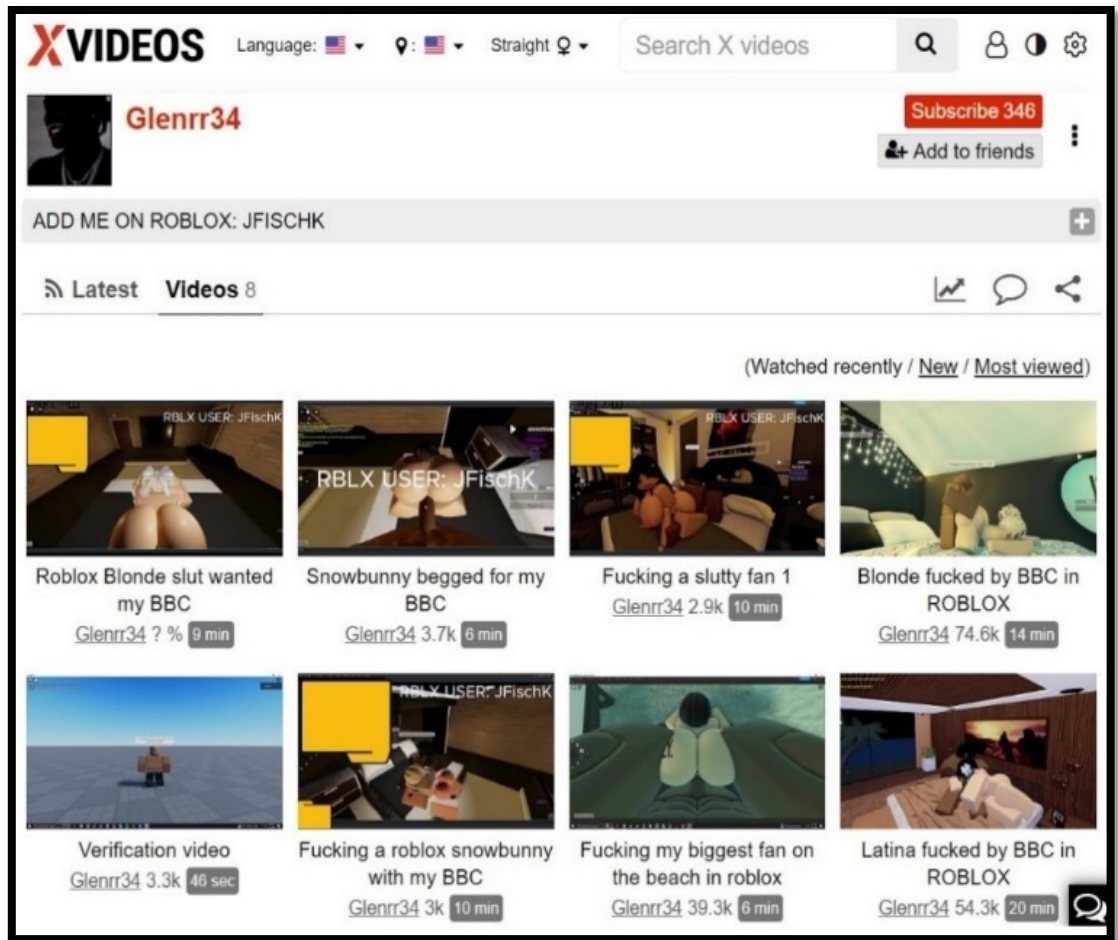
27 ⁵² *Id.*

28 ⁵³ *Id.*

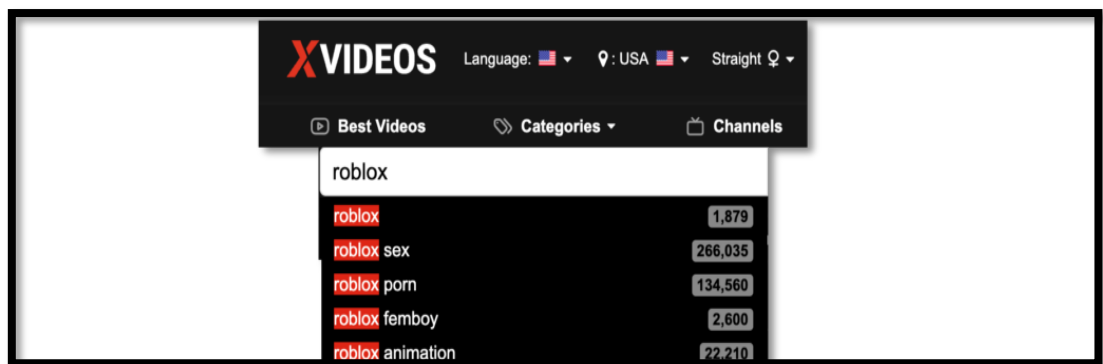
⁵⁴ *Id.*

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





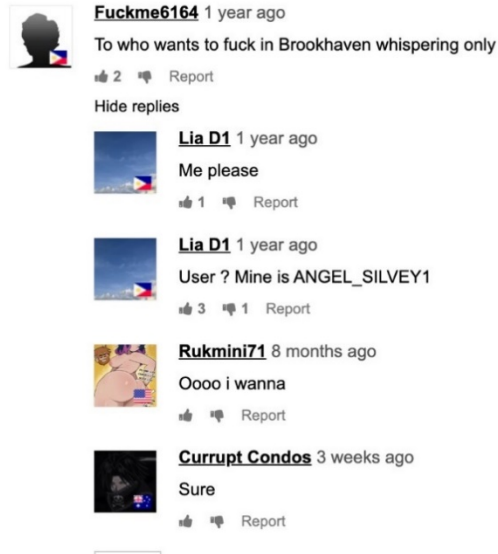
This Roblox user advertised their Roblox account on porn website, XVideos, where they had uploaded videos of their avatar having sex with other Roblox users.⁵⁵



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

⁵⁵ *Id.*

⁵⁶ *Id.*



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

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

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

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

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

⁵⁷ *Id.*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

9 78. During the pandemic, reports of child sex abuse facilitated by Roblox accelerated.
10 In 2020, for example, Roblox enabled a 47-year-old predator to pose as a teenager, target a 16-year-
11 old girl, move the conversation to Facebook, solicit explicit photos and videos, all of which
12 constituted child pornography,⁶⁵ and ultimately traffic her across state lines, raping her multiple
13 times.⁶⁶ In Michigan, a man was arrested for persuading an eight-year-old girl to send him videos
14 of herself, in various stages of undress, in exchange for Robux.⁶⁷ The perpetrator had been arrested
15 for similar offenses three years earlier and was a registered sex offender in Kansas. This perpetrator
16

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

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

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

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

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

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

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

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

5 79. 2023 was more of the same. For example, a 30-year-old man was arrested for
6 soliciting illicit photos from young victims and authorities reported that he had three separate
7 Roblox accounts.⁷⁰ A 27-year-old man was arrested for kidnapping an 11-year-old girl whom he
8 met on Roblox.⁷¹ A 23-year-old New Jersey man, who was a prominent Roblox developer with a
9 known history of exploiting children via Roblox, was sentenced to 15 years in prison for grooming
10 a 15-year-old girl, transporting her to his house, and sexually abusing her.⁷²

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

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

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

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

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

23 ⁷² 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),
24 <https://www.justice.gov/usao-sdin/pr/new-jersey-man-sentenced-15-years-federal-prison-after-grooming-minor-online-and>.

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

27 ⁷⁴ Ashley Harting, *Online Predator Who Targeted 10-Year-Old on Roblox Pleads Guilty in Butte County*, KRCR (Sep. 25, 2024), <https://krcrtv.com/news/local/online-predator-who-targeted-10-year-old-on-roblox-pleads-guilty-in-butte-county>.
28

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

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

17
18 ⁷⁵ Travis Schlepp, *Man, 64, Admits to ‘Catfishing’ Girl on Roblox, Convincing Her to Send*
19 *Explicit Images*, KTLA 5 (Jul. 26, 2024), [https://ktla.com/news/california/man-64-admits-to-](https://ktla.com/news/california/man-64-admits-to-catfishing-girl-on-roblox-convincing-her-to-send-explicit-images/)
20 [catfishing-girl-on-roblox-convincing-her-to-send-explicit-images/](https://ktla.com/news/california/man-64-admits-to-catfishing-girl-on-roblox-convincing-her-to-send-explicit-images/).

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

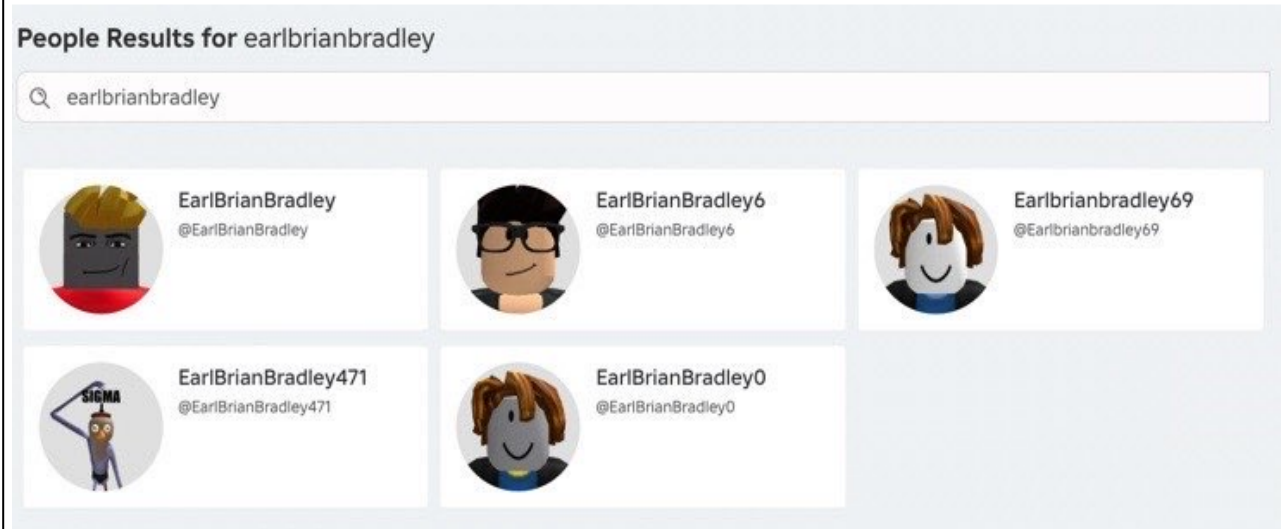
25 ⁷⁷ Martin Robinson, *Roblox Predator Who Raped 10-year-old Girl is Locked Up: Paedophile Who*
26 *‘Targeted Child He Met on Gaming Platform Is Jailed for Six Years*, Daily Mail (Jan. 17, 2025),
27 <https://www.dailymail.co.uk/news/article-14278563/Roblox-predator-raped-10-year-old-girl.html>.

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

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

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

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



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

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

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

⁸¹ Hindenburg Research, *supra* note 1.

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

⁸³ *Id.*

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

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

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

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

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

⁸⁷ *Id.*

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

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

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

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

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

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

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

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

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

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

17 91. By limiting safety measures, Roblox not only increased its users but also reduced
18 the company’s safety expenses as a percentage of its revenue—a key metric for Wall Street, which
19 views trust and safety costs as detrimental to Roblox’s stock performance. Barclays, for example,
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21
22 ⁸⁹ After listing on the New York Stock Exchange, Roblox CEO David Baszucki told CNBC,
23 “Roblox has been growing for 15 years That’s a long-term growth path, and we believe that
24 continues forward, even after Covid.” Ari Levy & Jessica Bursztynsky, *Roblox Jumps to \$38*
25 *Billion Mark Cap as Public Investors Get Their First Crack at the Popular Kids Game App*,
26 CNBC (Mar. 10, 2021), <https://www.cnbc.com/2021/03/10/roblox-rblx-starts-trading-at-64point50-after-direct-listing.html>. CFO Michael Guthrie added, “As [Covid] restrictions ease, we expect the rates of growth in 2021 will be well below the rates in 2020, however, we believe we will see absolute growth in most of our core metrics for the full year.” *Id.*

27 ⁹⁰ Hindenburg Research, *supra* note 1.

28 ⁹¹ *Id.*

⁹² *Id.*

⁹³ *Id.*

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

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

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

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

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

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

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

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

27 ⁹⁷ *Id.* (emphasis added).

28 ⁹⁸ *Id.*

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

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

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

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

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

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

17 99. And at its annual Developer Conference, CEO David Baszucki encouraged
18 developers to create experiences for older audiences, explaining that Roblox was rolling out
19 features designed to appeal to older users, including use of real names, screen capture and sharing
20 capabilities, video calls, and relaxed chat moderation.¹⁰⁷ These decisions, while framed as growth
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22

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

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

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

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

27 ¹⁰⁶ *Id.*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

¹¹⁹ *Id.*

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

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

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

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

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

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

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

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

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

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

25 ¹²³ Hindenburg Research, *supra* note 1.

26 ¹²⁴ Scott Tong & James Perkins Mastromarino, *Roblox Attempts to Bar Child Predators as Short
Sellers Target the Popular Game Platform*, WBUR (Oct. 21, 2024),
<https://www.wbur.org/hereandnow/2024/10/21/roblox-child-predators-safety>.

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

28 ¹²⁶ *Id.*

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

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

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

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

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

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

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

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

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

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

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

28 ¹³² *Id.*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

27 ¹⁴¹ *Id.*

28 ¹⁴² *Id.*

¹⁴³ *Id.*

¹⁴⁴ *Id.*

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

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

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

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

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

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23 ¹⁴⁵ Hindenburg Research, *supra* note 1.

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

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

¹⁴⁸ *Id.*

¹⁴⁹ *Id.*

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

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

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

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

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

¹⁵² Revealing Reality, *supra* note 150.



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

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

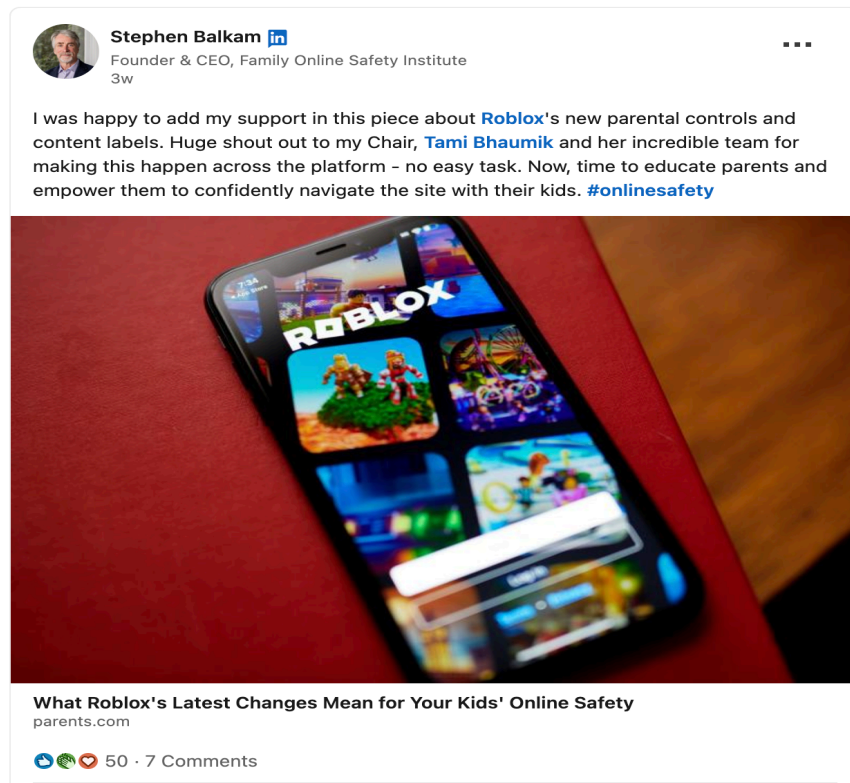
138. Roblox has also engaged in a deceptive public relations campaign using ostensibly independent online safety organizations to influence the narrative around these changes. For instance, Roblox has leveraged its ties to groups like the Family Online Safety Institute (“FOSI”). An online parenting magazine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

¹⁵³ *Id.*

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

¹⁵⁵ *Id.*

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



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

20 139. Most recently, in April 2025, Roblox repeated this same deceptive playbook of
21 bragging about new safety features that, in reality, are glaringly deficient. This update included
22 three new features: first, allowing parents to block children from playing specific games; second,
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25 ¹⁵⁶ Anna Halkidis, *What Roblox's Latest Changes Mean for Your Kids' Online Safety*, Parents (Nov. 18, 2024), <https://www.parents.com/roblox-new-parental-controls-8747405>.

26 ¹⁵⁷ *FOSI Welcomes Roblox Vice President as New Board Chair*, FOSI (Oct. 12, 2022), <https://www.fosi.org/about-press/fosi-welcomes-roblox-vice-president-as-new-board-chair>.

27 ¹⁵⁸ LinkedIn, Stephen Balkam's Post, https://www.linkedin.com/posts/stephenbalkam_what-roblox-latest-changes-mean-for-your-activity-7264409332950220801-WCDF (last visited Jan. 6, 2025).
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1 granting parents the power to block people on their child’s friends list; and third, giving parents
2 visibility into the games that their child spends the most time in.¹⁵⁹

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

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

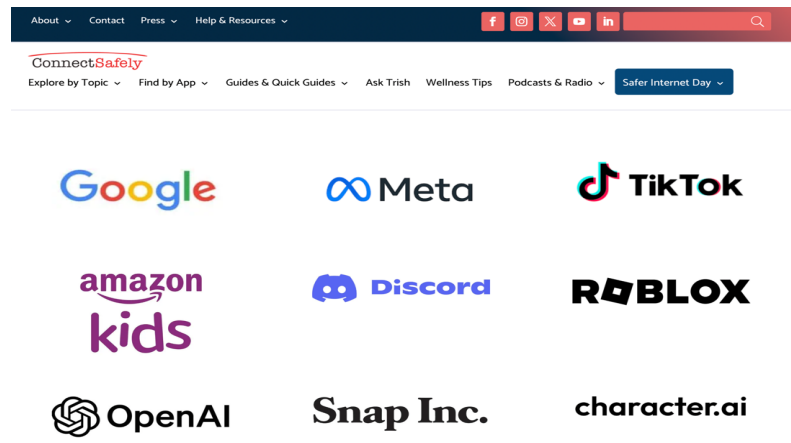
15 142. Roblox’s deceptive playbook would not be complete without a misleading public
16 relations campaign, where industry-funded safety “experts” praise Roblox’s safety update. For
17 example, Roblox’s press release announcing these updates quotes Larry Magid, the CEO of
18 ConnectSafely, as saying,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

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

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

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



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

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

18 144. FOSI CEO Stephen Balkam was also quoted in the *Newsweek* piece, claiming that
19 Roblox was “top-of-class” for its safety features and even repeating Roblox’s own party line that
20 safety is “part of [Roblox’s] DNA.”¹⁶⁴ Again, this article omitted FOSI’s ties to Roblox, financial
21 and otherwise, thereby deceptively pushing a narrative of Roblox as a “safe” application for kids.
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25 ¹⁶² ConnectSafely, *Supporters*, <https://connectsafely.org/about-us/supporters/> (last accessed May
26 10, 2025).

27 ¹⁶³ Katherine Fung, *How Roblox Became a Trusted Playground for Millions of Kids*, *Newsweek*
(Apr. 23, 2025), <https://www.newsweek.com/how-roblox-became-trusted-playground-millions-kids-2057601>.

28 ¹⁶⁴ *Id.*

1 **V. PLAINTIFF-SPECIFIC ALLEGATIONS**

2 145. Plaintiff is a teenage girl who is highly intelligent, artistic, and academically gifted.
3 Despite her talents and success in school, she has struggled with socialization and with making
4 friends in face-to-face settings. Her social anxiety caused her to rely heavily on online platforms
5 for social interaction, which became her primary source of connection with peers, particularly
6 during the COVID-19 pandemic when in-person social activities were limited.

7 146. Plaintiff began using Roblox around the age of 9. Plaintiff’s mother believed that
8 the app was safe for children. She had numerous friends whose children were using Roblox, and
9 she went on the company’s website, where she saw innocent-looking colorful avatars playing
10 games for children, which she relied on in determining the app was a kid-friendly environment with
11 adequate controls to keep younger kids safe. As discussed above, Roblox spent considerable time
12 and money publicly touting the safety and security of Roblox. This created the public perception
13 that Roblox had created a safe environment for kids. Unbeknownst to Plaintiff’s mother at the time,
14 this was nothing more than a false façade of safety.

15 147. Plaintiff would spend hours a day playing in various experiences on the app.
16 Plaintiff and her mother did not know what Roblox knew: that Roblox was not screening any users
17 before allowing them onto the platform and instead was knowingly facilitating the ability for known
18 predators to interact with millions of kids.

19 148. In 2023, when Plaintiff was around 15 years old, she received a message from a man
20 who told her that he was 16 years old but, unbeknownst to Plaintiff at this time, was in fact in his
21 30s. His Roblox account listed his age as “13+.” Roblox did no background check and allowed all
22 users to create an account with whatever information they wanted to use even if it was deceptive.
23 Roblox intentionally designed the platform that way and intentionally chose not to screen any
24 potential users. The man was a serial predator who was on an FBI watch list for previously targeting
25 children on Roblox. But because of Roblox’s failure to implement basic age and identity
26 verifications or any screening process before admitting users to the platform, and despite Plaintiff’s
27 mother’s attempts to implement supposed safety features on the app, he was able to target and
28 engage with Plaintiff, posing as a fellow teenager. Had Roblox implemented even the most basic

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

4 149. By this time, Roblox had long been aware—from countless police reports and
5 incidents reported in the media—that its app was widely used by predators to target, groom, and
6 sexually assault children. Roblox specifically knew from numerous tragic events that occurred in
7 the real world that predators target and manipulate children on its app by lying about their age. Yet
8 rather than warn parents or take other measures to protect children from harm, Roblox continued
9 with its deceptive campaign to portray the app as safe for children and to conceal information that
10 it knew about the pervasive predatory conduct that its app enabled and facilitated. Had she known
11 the truth about Roblox and its business practices, Plaintiff's mother would never have permitted
12 Plaintiff to use the app.

13 150. The predator then engaged in a pattern of calculated grooming behavior that Roblox
14 had known about and enabled for years through its deliberate failures to modify the design or
15 otherwise provide any meaningful safeguards to protect children on the app. He initially engaged
16 in innocent conversation but gradually escalated to sexual topics and explicit exchanges.
17 Ultimately, the predator was able to convince Plaintiff to create an account on another online
18 platform, where he escalated his predation to an even more disturbing level, coercing her into
19 sending him sexually explicit images of herself.

20 151. In the spring of 2024, when Plaintiff was 16 years old, the predator convinced her
21 to meet in person on two separate occasions. During the first meeting in Indiana, he coerced
22 Plaintiff into engaging in oral sex and videorecorded his sexual abuse on his mobile device. During
23 the second meeting, the predator coerced Plaintiff into leaving her home with him and traveling to
24 Georgia, where he vaginally penetrated her on numerous occasions. During this meeting, he refused
25 to allow Plaintiff to call her mother to inform her of her whereabouts. He repeatedly stated that she
26 should trust him and that if she called her mother, she would get into trouble or face worse
27 consequences.

1 152. She was able to escape the predator and make her way to a local police department,
2 where she was forced to undergo traumatizing interviews with police officers and receive medical
3 treatment as a result of the abuse she suffered.

4 153. As the result of the sexual exploitation and abuse Plaintiff suffered because of
5 Roblox's tortious conduct, Plaintiff was subjected to significant emotional, psychological, and
6 physical trauma. She has required psychological intervention and continues to grapple with anxiety
7 and moments of disassociation. She has endured, and continues to endure, immense humiliation,
8 shame, constant and paralyzing fear, and a profound loss of trust, safety, and innocence.

9 **VI. CAUSES OF ACTION**

10 **FIRST CAUSE OF ACTION**

11 **FRAUDULENT CONCEALMENT AND MISREPRESENTATIONS**

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

13 154. Plaintiff incorporates each and every factual allegation set forth above.

14 155. This claim is brought against Defendant Roblox.

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

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

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

27 159. Defendant breached its duty to the public, users, and their parents by concealing and
28 failing to disclose the serious safety risks presented by its app. Even though Defendant knew of

1 those risks based on Defendant's internal reviews, external studies known to Defendant, and parent
2 and police reports made to Defendant, it intentionally concealed those risks to not lose users and
3 revenue, and to induce parents to allow their children to use its app. Such risks were known only
4 to Defendant, and the public, users, and their parents, including Plaintiff's mother, could not have
5 discovered such serious safety risks.

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

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

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

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

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

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

25 166. As a direct and proximate result of Defendant's concealment of material information
26 and misrepresentations, Plaintiff sustained serious injuries and harm.

27 167. Defendant's concealment of material information and misrepresentations were a
28 substantial factor in causing harm to Plaintiff.

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

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

SECOND CAUSE OF ACTION

NEGLIGENCE – GENERAL

(By Plaintiff Against Defendant Roblox)

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

171. This claim is brought against Defendant Roblox.

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

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

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

- a. As businesses, Defendant owes a duty to protect customers against reasonably foreseeable criminal acts of third parties and other dangers known to Defendant on its app;
- b. Plaintiff, as a minor, was vulnerable and dependent on Defendant for a safe environment on its app, and Defendant has superior ability and control to provide that safety with respect to activities that it sponsors or controls;
- c. Plaintiff relied upon Defendant for protection against third-party misuse or misconduct;
- d. The special relationship Plaintiff had with Defendant substantially benefits Defendant through profits and growth in users and user activity. Defendant could not successfully operate without the growth in users and user activity generated by children;
- e. Defendant was far more to Plaintiff than a business. Defendant provided Plaintiff with opportunities for social interaction and a discrete community of other users. Plaintiff was dependent on Defendant to provide structure, guidance, and a safe environment;
- f. Defendant has superior control over its app environment and the ability to protect its users. Defendant imposes a variety of rules and restrictions to supposedly maintain a safe and orderly environment. Defendant employs internal staff to enforce these rules and restrictions and can monitor and discipline users when necessary. Defendant has the power to influence Plaintiff's values, consciousness, relationships, and behaviors; and
- g. Defendant has voluntarily undertaken a responsibility to keep children safe on its app. As alleged above, Defendant has publicly stated that it takes steps to keep children safe on its app and therefore has undertaken a duty to act reasonably in taking such steps.

175. Plaintiff was a foreseeable user of Defendant's app.

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

1 177. Defendant invited, solicited, encouraged, or reasonably should have foreseen the
2 fact, extent, and manner of Plaintiff's use of its app.

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

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

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

21 181. Defendant's conduct was closely connected to Plaintiff's injuries, which were
22 highly certain to occur, as evidenced by the significance of Plaintiff's injuries.

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

25 183. Imposing a duty on Defendant would benefit the community at large.

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

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

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

- 11 a. Including features in its app that, as described above, are currently structured
12 and operated in a manner that unreasonably creates or increases the foreseeable
13 risk of grooming, sexual abuse, and sexual exploitation to youth, including
14 Plaintiff;
- 15 b. Including features in its app that, as described above, are currently structured
16 and operated in a manner that unreasonably creates or increases the foreseeable
17 risk of harm to the physical and mental health and well-being of youth users,
18 including Plaintiff, including but not limited to physical injury, damage to self-
19 worth, stigma and social isolation, reduced academic performance, increased
20 risky behavior, susceptibility to future sexual exploitation, attachment issues,
21 identity confusion, and profound mental health issues for young consumers,
22 including but not limited to depression, anxiety, suicidal ideation, self-harm,
23 post-traumatic stress disorder, insomnia, eating disorders, death, and other
24 harmful effects;
- 25 c. Maintaining unreasonably dangerous features in their apps after notice that such
26 features, as structured and operated, posed a foreseeable risk of harm to the
27 physical and mental health and well-being of youth users;

- 1 d. Facilitating unsupervised and/or hidden use of its app by youth, including by
2 adopting protocols that allow youth users to change their own safety settings or
3 parental controls, and create multiple and private accounts; and
4 e. Inviting young children on its app and marketing to young children when
5 Defendant knew that the app, as designed, was not safe for young children.

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

- 11 a. Failing to implement effective parental controls;
12 b. Failing to screen users before allowing them on the app;
13 c. Failing to implement effective parental notifications, such as when a child
14 messages another user, particularly an adult user, or when a child interacts with
15 accounts that have been blocked by other users or suspended in the past;
16 d. Failing to require adult users to provide a phone number when signing up for an
17 account;
18 e. Failing to implement pop-up safety notices within chats and games to warn users
19 about inappropriate behavior;
20 f. Failing to ban IP and MAC addresses of accounts associated with known
21 abusers;
22 g. Failing to set default safety settings to the most protective options;
23 h. Having an open chat function;
24 i. Failing to provide a transcript of a child's communications to the parent;
25 j. Failing to implement reasonably available means to monitor for, report, and
26 prevent the use of their apps by sexual predators to victimize, abuse, and exploit
27 youth users;
28

- k. Failing to provide effective mechanisms for youth users and their parents/guardians to report abuse or misuse of their apps;
- l. Failing to implement effective protocols to verify ages and identity of all users;
- m. Failing to place reasonable age restrictions on the app;
- n. Failing to separate adults from children on the app by, for example, creating a separate app for children;
- o. Failing to adequately fund its trust and safety program; and
- p. Others as set forth herein.

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

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

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

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

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

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

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

4 **THIRD CAUSE OF ACTION**

5 **NEGLIGENCE – FAILURE TO WARN**

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

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

8 196. This claim is brought against Defendant Roblox.

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

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

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

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

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

26 202. Defendant knew or, by the exercise of reasonable care, should have known that its
27 app posed risks of harm to youth. These risks were known and knowable in light of Defendant's
28

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

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

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

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

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

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

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

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

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

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

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

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

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

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

FOURTH CAUSE OF ACTION

NEGLIGENCE – UNREASONABLE DESIGN

(By Plaintiff Against Defendant Roblox)

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

215. This claim is brought against Defendant Roblox.

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

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

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

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

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

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

24 222. Plaintiff was a foreseeable user of Defendant's app.

25 223. Defendant knew that minors such as Plaintiff would use its app.

26 224. Defendant breached its duty in designing its app.
27
28

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7 **FIFTH CAUSE OF ACTION**

8 **NEGLIGENT UNDERTAKING**

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

10 236. Plaintiff incorporates each and every factual allegation set forth above.

11 237. This claim is brought against Defendant Roblox.

12 238. Defendant rendered parental control services and account safety services to
13 Plaintiff's mother.

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

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

19 241. Defendant's conduct was closely connected to Plaintiff's injuries, which were
20 highly certain to occur, as evidenced by the significance of Plaintiff's injuries.

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

24 243. Imposing a duty on Defendant would benefit the community at large.

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

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

4 246. Plaintiff's mother relied on Defendant exercising reasonable care in undertaking to
5 render parental control and account safety services.

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

9 248. Defendant failed to exercise reasonable care in rendering these parental control and
10 account safety services.

11 249. Defendant's failure to exercise reasonable care increased the risk of, and was a
12 substantial factor in causing harm to Plaintiff.

13 250. Plaintiff was harmed by her mother's reliance on Defendant to provide effective
14 parental control and account safety services.

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

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

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

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

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SIXTH CAUSE OF ACTION
STRICT LIABILITY – DESIGN DEFECT
(By Plaintiff Against Defendant Roblox)

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

256. This claim is brought against Defendant Roblox.

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

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

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

260. Defendant’s product is distributed and sold to the public through retail channels (e.g., the Apple App “Store” and the Google Play “Store”).

261. Defendant’s product is marketed and advertised to the public for the personal use of the end-user/consumer.

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

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

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

1 265. Defendant defectively designed its product to appeal to adult predators by making
2 it easy to find children and enabled their contact, grooming, sexual exploitation, and sexual abuse
3 of children, including Plaintiff.

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

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

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

25 269. The risks inherent in the design of Defendant's product significantly outweigh any
26 benefits of such design.

1 270. Defendant could have utilized cost-effective, reasonably feasible alternative
2 designs, including changes to the problematic features described above, to minimize the harms
3 described herein, including, but not limited to:

- 4 a. Requiring children have parental approval and a parent's email address to sign-
5 up for an account;
- 6 b. Effective parental controls;
- 7 c. Effective parental notifications, including notifying parents any time a child
8 messages another user, particularly an adult user, or notifying parents when
9 children interact with accounts that have been blocked by other users or
10 suspended in the past, among other controls;
- 11 d. Setting default safety settings to the most protective options, including blocking
12 direct messaging between child and adult users, or only allowing messaging
13 between adult users and a child with the parent's explicit permission to message
14 the adult user;
- 15 e. Requiring adults to provide a phone number when signing up for an account;
- 16 f. Pop-up safety notices within chats and games to warn users about inappropriate
17 behavior;
- 18 g. Preventing strangers from sending Robux to child accounts, and preventing
19 children from sending Robux to strangers' accounts;
- 20 h. Banning IP and MAC addresses of accounts associated with known abusers;
- 21 i. Controlled chat option;
- 22 j. Providing a transcript of a child's communications to the parent;
- 23 k. Implementing reporting protocols to allow users or visitors of Defendant's
24 product to report child sex abuse material and adult predator accounts
25 specifically without the need to create or log in to the products prior to reporting;
- 26 l. Robust age and identity verification;
- 27 m. Reasonable age restrictions;
- 28

- 1 n. Separating adults from children by, for example, creating a separate app for
2 children; and
3 o. Others as set forth herein.

4 271. Alternative designs were available that would prevent child predators from finding,
5 grooming, and exploiting children, and which would have served effectively the same purpose of
6 Defendant's product while reducing the gravity and severity of danger posed by its product's
7 defects.

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

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

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

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

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

23 277. As a direct and proximate result of Defendant's product's defective design, Plaintiff
24 suffered serious and dangerous injuries.

25 278. As a direct and proximate result of Defendant's product's defective design, Plaintiff
26 requires and/or will require more healthcare and services and did incur medical, health, incidental,
27 and related expenses.

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

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

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

11 **SEVENTH CAUSE OF ACTION**
12 **STRICT LIABILITY – FAILURE TO WARN**
13 **(By Plaintiff Against Defendant Roblox)**

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

15 283. This claim is brought against Defendant Roblox.

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

19 285. Defendant's product was designed, manufactured, maintained, controlled and
20 distributed from the California headquarters of Defendant.

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

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

27 288. Defendant sold and distributed its product to Plaintiff in a defective and
28 unreasonably dangerous condition by failing to adequately warn about the risk of harm to youth as

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

7 289. Defendant was in the best position to know the dangers its product posed to
8 consumers, including Plaintiff, as it had superior knowledge of the risks and dangers posed by its
9 product and had exclusive knowledge of these risks at the time of development, design, marketing,
10 promotion, advertising and distribution. Defendant had exclusive control of its product at all times
11 relevant to this litigation.

12 290. Defendant's product is dangerous, to an extent beyond that contemplated by the
13 ordinary user who used Defendant's product, because it enables predators to find, groom, abuse,
14 and exploit children.

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

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

21 293. Defendant's product is defective and unreasonably dangerous because, among other
22 reasons described herein, Defendant failed to exercise reasonable care to inform users that, among
23 other things:

- 24 a. Sexual predators use Defendant's product to find, contact, groom and abuse
25 children with alarming frequency;
- 26 b. Sexual predators use Defendant's product to solicit, produce, and distribute
27 CSAM with alarming frequency;

- c. Sexual predators target young children for CSAM on Defendant's product with alarming frequency;
- d. Sexual predators use Robux to coerce children into sending them nude photos or engaging in other types of sexually explicit behavior;
- e. Defendant's product is designed in a way that enables and increases risk of exposure to predators and resulting sexual exploitation;
- f. Defendant's product causes grooming, sexual abuse, and sexual exploitation, and its resultant physical and mental injuries;
- g. Use of Defendant's product can increase risky and uninhibited behavior in children, making them easier targets to adult predators for sexual exploitation, sextortion, and CSAM;
- h. Use of Defendant's product can normalize abuse and pornography, leading children to abuse other children either contemporaneously or later when the children are older;
- i. New users of Defendant's product can identify themselves as minors, begin to use the product, and do so indefinitely, without ever receiving a safety warning, and without ever having to provide information so that Defendant can warn the users' parents or guardians;
- j. Defendant's failure to verify ages allows children to bypass parental controls, safety features and default settings;
- k. The likelihood and severity of harms is greater for children;
- l. The likelihood and intensity of these harmful effects is exacerbated by the interaction of each product's features with one another; and
- m. Others as set forth herein.

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

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

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

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

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

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

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

16 **VII. PRAYER FOR RELIEF**

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

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

6. Attorneys' fees;
7. For costs of suit incurred herein;
8. Pre-judgment and post-judgment interest as provided by law;
9. For nonmonetary injunctive relief; and
10. For such other and further relief as the Court may deem just and proper.

Date: May 19, 2025

Respectfully submitted,

ANAPOL WEISS

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**Pro Hac Vice motions forthcoming*

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

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

3
4 Date: May 19, 2025

ANAPOL WEISS

5
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