

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-md-03047-YGR

MDL No. 3047

This Document Relates to:

COMMONWEALTH OF PENNSYLVANIA, BY
AND THROUGH BUCKS COUNTY D.A. JOE
KHAN, Plaintiff, vs. TIKTOK INC., et al.,
Defendants

**LOCAL GOVERNMENT AND SCHOOL
DISTRICT MASTER SHORT-FORM
COMPLAINT AND DEMAND FOR JURY
TRIAL**

Member Case No.:

4:23-cv-01149-YGR

Amended Short Form Complaint Adding
Defendants Roblox and X Corp.

The Plaintiff(s) named below file(s) this *Short-Form Complaint and Demand for Jury Trial* against the Defendant(s) named below by and through their undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations, claims, and relief sought in *Plaintiffs' Master Local Government and School District Complaint* ("Master Complaint") as it relates to the named Defendant(s) (checked-off below), filed in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047, in the United States District Court for the Northern District of California. Plaintiff(s) file(s) this *Short-Form Complaint* as permitted by Case Management Order No 8.

Plaintiff(s) indicate(s) by checking the relevant boxes below the Parties and Causes of Actions specific to Plaintiff(s)' case.

Plaintiff(s), by and through their undersigned counsel, allege(s) as follows:

I. DESIGNATED FORUM

1. *For Direct Filed Cases:* Identify the Federal District Court in which the Plaintiff(s) would have filed in the absence of direct filing:

United States District Court for the Eastern District of Pennsylvania.

2. *For Transferred Cases:* Identify the Federal District Court in which the Plaintiff(s) originally filed and the date of filing:

II. IDENTIFICATION OF PARTIES

A. PLAINTIFF(S)

3. *Plaintiff(s):* Name(s) of the local government or school district alleging claims against Defendant(s):

Commonwealth of Pennsylvania on behalf of Bucks County, acting by and through Bucks County District Attorney Joe Khan.

4. Number of schools served in the Plaintiff(s)' school district or local community:

There are approximately 270 schools in Bucks County.

5. Number of minors served in the Plaintiff(s)' school district or local community:

There are approximately 35, 271 children ages 5-17 in Bucks County.

6. At the time of the filing of this *Short-Form Complaint*, Plaintiff(s) is/are a resident and citizen of [*Indicate State*]:

Commonwealth of Pennsylvania.

B. DEFENDANT(S)

7. Plaintiff(s) name(s) the following Defendant(s) in this action [*Check all that apply*]:

META ENTITIES

☒ META PLATFORMS, INC.,
formerly known as Facebook, Inc.

☒ INSTAGRAM, LLC

☒ FACEBOOK PAYMENTS, INC.

☒ SICULUS, INC.

☐ FACEBOOK OPERATIONS, LLC

☒ FACEBOOK HOLDINGS, LLC

☒ META PAYMENTS INC.

TIKTOK ENTITIES

☒ BYTEDANCE LTD

☒ BYTEDANCE INC.

☒ TIKTOK LTD

☒ TIKTOK LLC

☒ TIKTOK INC.

SNAP ENTITY

☒ SNAP, INC.

GOOGLE ENTITIES

☒ GOOGLE, LLC

☒ YOUTUBE, LLC

OTHER DEFENDANTS

For each “Other Defendant” Plaintiff(s) contends are additional parties and are liable or responsible for Plaintiff(s)’ damages alleged herein, Plaintiff(s) must identify by name each Defendant and its citizenship, and Plaintiff(s) must plead the specific facts supporting any claim against each “Other Defendant” in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

NAME	CITIZENSHIP
Meta Platforms Technologies, LLC	Delaware, California
Discord Inc.	Delaware, California
Roblox Corporation	Delaware, California
X Corp.	Nevada, Texas

III. CAUSES OF ACTION ASSERTED

8. The following Causes of Action asserted in the *Master Complaint*, and the allegations with regard thereto, are adopted in this *Short-Form Complaint* by reference (*check all that are adopted*):

Asserted Against ¹	Count Number	Cause of Action (COA)
☒ Meta entities ☒ Snap ☒ TikTok entities ☒ Google entities ☒ Other Defendant(s) ²	1	NEGLIGENCE
☐ Meta entities ☐ Snap ☐ TikTok entities ☐ Google entities ☐ Other Defendant(s)	2	PUBLIC NUISANCE

NOTE

If Plaintiff(s) want(s) to allege additional Cause(s) of Action other than those selected in paragraph 8, which are the Causes(s) of Action set forth in the *Master Complaint*, the facts supporting those additional Cause(s) of Action, must be pled in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

IV. ADDITIONAL CAUSES OF ACTION

9. Plaintiff(s) assert(s) the following additional Causes of Action and supporting allegations against the following Defendants:

Unfair competition and unfair or deceptive acts or practices in violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Act, 73 P.S. §201, et seq. (Against all Defendants).

See Attachment A: SUPPORTING ALLEGATIONS REGARDING AMENDED SHORT-FORM COMPLAINT AND DEMAND FOR JURY TRIAL.

¹ For purposes of this paragraph, “entity” means those Defendants identified in Paragraph 7 (*e.g.*, “TikTok entities” means all TikTok Defendants against which Plaintiff(s) is/are asserting claims).

² Reference selected “Other Defendants” by the corresponding row number in the “Other Defendant(s)” chart identified in Paragraph 7.

1 **WHEREFORE**, Plaintiff(s) pray(s) for relief and judgment against Defendants and all
 2 such further relief that this Court deems equitable and just as set forth in the *Master Complaint*,
 3 and any additional relief to which Plaintiff(s) may be entitled.

4
 5 **JURY DEMAND**

6 Plaintiff(s) hereby demand a trial by jury as to all claims in this action.

7 ****

8 By signature below, Plaintiff(s)' counsel hereby confirms their submission to the authority
 9 and jurisdiction of the United States District Court of the Northern District of California and
 10 oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as
 11 necessary through sanctions and/or revocation of *pro hac vice* status.

12 /s/ Aelish M. Baig

13 Name: AELISH M. BAIG

14 Firm: ROBBINS GELLER RUDMAN & DOWD LLP

15 Address: One Montgomery St., Suite 1800, San Francisco, CA 94104

16 Phone: 415/288-4545

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19
 20 *Attorneys for Plaintiff(s)*

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 22 BUCKS COUNTY DISTRICT ATTORNEY
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ATTACHMENT A

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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re SOCIAL MEDIA ADOLESCENT) MDL No. 4:22-md-03047-YGR
ADDICTION/PERSONAL INJURY)
PRODUCTS LIABILITY LITIGATION)

This Document Relates To:

COMMONWEALTH OF PENNSYLVANIA,) Case No. 4:23-cv-01149-YGR
ACTING BY AND THROUGH BUCKS)
COUNTY DISTRICT ATTORNEY JOE)
KHAN,¹)

Plaintiff,

vs.

TIKTOK INC., et al.,

Defendants.

SUPPORTING ALLEGATIONS REGARDING AMENDED SHORT-FORM COMPLAINT
AND DEMAND FOR JURY TRIAL

¹ The case caption has been amended to reflect that this action is brought solely on behalf of the Commonwealth of Pennsylvania, acting by and through Bucks County District Attorney Joe Khan. There is a separately filed action brought on behalf of Bucks County, Pennsylvania. The cases have the same case number because they were initially filed together in the same complaint (Case No. 4:23-cv-01149-YGR, Dkt. No. 1), but in conformance with the Court's subsequent order prohibiting multi-plaintiff complaints (MDL3047, Dkt. 620), Bucks County and the Commonwealth of Pennsylvania by and through Bucks County District Attorney Joe Khan are filing their amended complaints separately.

I. ADDITIONAL ALLEGATIONS

1. Plaintiff, Commonwealth of Pennsylvania, Acting By and Through Bucks County District Attorney Joe Khan² (“Plaintiff” or “Commonwealth of Pennsylvania”) incorporates by reference each and every allegation in the original Complaint in *Bucks County and Commonwealth of Pennsylvania, acting by and through Bucks County District Attorney Matthew D. Weintraub v. TikTok Inc.*, No. 4:23-cv-01149-YGR (ECF 1).³

A. Additional Defendants

2. Defendant Meta Platforms Technologies, LLC (“Meta Platforms Technologies”) is a subsidiary of defendant Meta Platforms, Inc.’s (“Meta” or “Company”), organized under the laws of the State of Delaware as Oculus VR, LLC on March 21, 2014 and acquired by Meta on March 25, 2014 *sub nom* Facebook Technologies, LLC. Meta Platforms Technologies develops Meta’s virtual and augmented reality technology, such as the Meta Quest line of services, among other technologies related to Meta’s platforms, and its principal place of business is in Menlo Park, California. Defendant Meta is the sole member of Meta Platforms Technologies.

3. Defendant Discord Inc. (“Discord”) is a Delaware corporation. Its principal place of business is in San Francisco, California. Its primary product, a social media platform called Discord, was launched in 2015 and is widely available throughout the United States.

4. Defendant Roblox Corporation (“Roblox”) is a Delaware corporation with its principal place of business at 3150 South Delaware Street, Suite 201, San Mateo, California 94403. Its gaming and social media platform is called Roblox.

5. Defendant X Corp. (formerly known as Twitter) (“X Corp.” or the “X Platform”), is a Nevada corporation with its principal place of business at 865 FM 1209, Building 2, Bastrop,

² Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, an action does not abate when a public officer who is a party in an official capacity ceases to hold office while the action is pending. The officer’s successor is automatically substituted as a party. On January 5, 2026, Joe Khan was sworn in as Bucks County District Attorney. Accordingly, Joe Khan, as successor to Matthew D. Weintraub, is automatically substituted as a party in this action.

³ The original Complaint was filed on behalf of both the Bucks County District Attorney and the Bucks County Solicitor. This Amended Complaint is filed solely on behalf of the Commonwealth of Pennsylvania by and through the Bucks County District Attorney.

1 Texas 78602. X Corp. owns and operates the X Platform, accessible through twitter.com, X.com,
 2 and various mobile and online applications. X Corp. merged with Twitter, Inc. in April 2023 and
 3 is the successor-in-interest to Twitter, Inc.

4 **B. Additional Allegations Relating to Defendant Discord**

5 6. Plaintiff incorporates by reference each and every allegation against Discord
 6 included in *C.U. v. Snap Inc.*, No. 4:22-cv-07347-YGR (N.D. Cal.) (ECF 1), and *Guillot v. Meta*
 7 *Platforms, Inc.*, No. 4:23-cv-03453-YGR (N.D. Cal.) (ECF 1).

8 7. Discord is an instant messaging and social media platform that allows for users to
 9 communicate with each other through private and group-based messaging, including through text,
 10 photos, videos, and video calls. It can be likened to a series of chat rooms and groups in which
 11 users can engage in conversation with others. It was launched in 2015. As of January 2024, the
 12 platform had more than 196 million active users each month.⁴ As noted by co-founder and Chief
 13 Executive Officer (“CEO”) Jason Citron at the January 31, 2024 Congressional hearing, more than
 14 60% of Discord’s active users are between the ages of 13 and 24 years old.⁵

15 8. Discord generates revenue through user subscription fees that gives users access to
 16 features like custom emojis for \$5 or \$10 per month. Discord also generates revenue through
 17 access to their server, of which the company takes a 10% cut.⁶

18 9. Discord has designed, developed, produced, operated, promoted, distributed, and
 19 marketed its platforms to attract, capture, and addict youth, with minimal parental oversight. Not
 20 only are Discord’s features engineered to induce compulsive use by young people, it has also failed
 21 to reasonably protect child users and help limit and prevent child sexual exploitation, sextortion,
 22

23 ⁴ Werner Geyser, *The Latest Discord Statistics: Servers, Revenue, Data, and More*, Influencer
 24 Marketing Hub (Jan. 30, 2024), <https://influencermarketinghub.com/discord-stats/>.

25 ⁵ Adi Robertson, *Meta, TikTok, and other tech companies go to Congress: all the news*, Verge
 26 (Jan. 31, 2024), <https://www.theverge.com/2024/1/31/24056136/congress-child-safety-hearing-kosa-meta-x-discord-snap-tiktok/archives/2>.

27 ⁶ Kellen Browning, *How Discord, Born From an Obscure Game, Became a Social Hub for*
 28 *Young People*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

1 and distribution of known Child Sexual Assault Material (“CSAM”) by failing to implement
2 certain design features that prioritize children’s safety.

3 10. Discord has designed and operates its product in such a way that it also allows
4 people to chat using fake names; and the task of enforcing community standards is largely
5 delegated to the organizers of individual Discord groups, called “servers.”⁷ By default, all users –
6 including users under 18 years old – can receive friend invitations from anyone in the same server,
7 which opens the ability for them to send and receive private messages from strangers.⁸

8 11. Discord’s dangerous and harmful design features include, *inter alia*, a lack of
9 reliable age verification to determine users’ ages; failure to implement effective parental controls;
10 failure to implement effective parental notifications; failure to enable default protections for youth
11 in order to protect against compulsive use or overuse of the product; and a lack of community
12 safety precautions to prevent adults from preying on children, such as false assurances that certain
13 features will keep users safe and downplaying the dangers of its product to youth users.

14 12. Discord’s terms of use prohibit users under 13 years old, but Discord does not verify
15 user age or identity. There is no parental notification to parents when a youth user signs up for a
16 new account. Because it has failed to implement a robust and effective age verification process,
17 there are children aged 13 and under using the product; in fact, Discord is aware that children as
18 young as eight years old are currently using the product.⁹ Discord has access to information within
19 its platform to identify the age of its users because youth users often state their real age in their bio
20 and/or tell other users their real age in group and private chats using one or more Discord product
21 features. Youth users also post photos that often reflect their actual age.

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25 ⁷ *Id.*

26 ⁸ Samantha Murphy Kelly, *The dark side of Discord for teens*, CNN Bus. (Mar. 22, 2022),
27 <https://www.cnn.com/2022/03/22/tech/discord-teens/index.html>.

28 ⁹ Kellen Browning, *supra* note 6.

13. In many cases, youth users are able to access Discord throughout the school day because it is not one of the applications that is blocked on school networks, such as Snapchat and Instagram.¹⁰

14. Discord has failed to implement safety features such that there is an unreasonable opportunity for and risk of sexual exploitation of youth on the platform. By default, all product users – including users under 18 years old – can receive friend invitations from anyone in the same server, which opens the ability for them to send and receive private messages from strangers.¹¹ Discord has failed to implement effective parental controls to prevent such activity from causing harm to youth. Discord has failed to implement effective tools for youth/parent users to choose to avoid such problematic and harmful experiences.

15. Discord’s purported “safety” features create a false sense of security on the platform, which create an unreasonable risk of harm to youth. For instance, until in or around October 2023, the Discord support pages described the platform’s “Safe Direct Messaging” options in the following ways:

- Keep me safe: the safest option. This will have Discord scan any image sent in all DMs, regardless of whether you’ve added the user on your friend list, or the user is DMing you just by sharing a mutual server.
- My friends are nice: The medium-est option! This will let Discord know to scan any images sent in DMs from users that aren’t on your friends list, but also to trust your previously-added friends and not worry about any images they send.
- Do not scan: The self-confident option. Enabling this option will completely disable Discord’s image scanning process, and leave you for a walk on the wild side for any and all DMs you receive. Careful, it’s a jungle out there!

16. These representations reasonably would lead youth users to believe that Discord will scan for and block sexually explicit materials, including materials used to groom and/or blackmail youth users. Discord should not be offering less-safe options (“My friends are nice” and “Do not scan”) to youth users without parental consent. The less-safe options as product

¹⁰ Samantha Murphy Kelly, *The dark side of Discord for teens*, *supra* note 8.

¹¹ *Id.*

1 features are further defective and/or dangerous for youth users because they downplay the risks of
 2 sexually explicit and/or otherwise harmful content through direct messaging, with descriptions
 3 such as “the wild side” and “a jungle,” and suggesting that the “Do not scan” option is “The self-
 4 confident option.” This creates a false sense of security that results in direct harm to Discord’s
 5 youth users.

6 17. Further, the safe messaging features do not operate as promised. The “Keep me
 7 safe” option, as described, would reasonably lead a youth user to understand that Discord’s
 8 scanning service would keep them “safe” from predatory users and sexually explicit and/or
 9 otherwise harmful content. However, Discord’s safety scanning service did not do even that. This
 10 option filters explicit content received in direct messages only, not those received through group
 11 messaging.¹² The viewing and trading of CSAM is rampant via Discord.¹³

12 18. Discord’s complete lack of parental controls also presents an unreasonable risk of
 13 harm to youth users. This allows youth to use the platform and be exposed to the risks of trauma,
 14 abuse, grooming, and exploitation through use of the product, all under the false impression that
 15 Discord is taking affirmative action to keep the users safe.

16 19. Youth users on Discord are exposed to sexual predators, who contact them over the
 17 platform, cultivate emotional connections, and engage in “grooming” in order to exploit,
 18 manipulate, and abuse such youth users.¹⁴ Youth are exposed to self-harm chats, including shared
 19 tips on how to hide cutting and other self-harm from parents, and suggested advice on how to run
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21
 22 ¹² Letter from Patrick Trueman and Dawn Hawkins, End Sexual Exploitation, to Jason Citron,
 23 CEO of Discord, April 26 2023, https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2023_FINAL_Redacted.pdf.

24 ¹³ *Id.*; Parents Together, Afraid, Uncertain, and Overwhelmed: A Survey of Parents on Online
 25 Sexual Exploitation of Children (2023), https://parentstogetheraction.org/wp-content/uploads/2023/03/PTPDF_final-2.pdf.

26 ¹⁴ See Dee Gatton, *Discord app raises safety concerns as experts warn of sexual exploitation*
 27 *risks*, 24 News (June 22, 2023), [https://nbc24.com/news/nation-world/discord-app-raises-safety-](https://nbc24.com/news/nation-world/discord-app-raises-safety-concerns-as-experts-warn-of-sexual-exploitation-risks-the-national-center-on-sexual-exploitation-purdue-university-dr-kathryn-seigfried-spellar-chat-app-grooming-social-media-platform)
 28 [concerns-as-experts-warn-of-sexual-exploitation-risks-the-national-center-on-sexual-](https://nbc24.com/news/nation-world/discord-app-raises-safety-concerns-as-experts-warn-of-sexual-exploitation-risks-the-national-center-on-sexual-exploitation-purdue-university-dr-kathryn-seigfried-spellar-chat-app-grooming-social-media-platform)
[exploitation-purdue-university-dr-kathryn-seigfried-spellar-chat-app-grooming-social-media-](https://nbc24.com/news/nation-world/discord-app-raises-safety-concerns-as-experts-warn-of-sexual-exploitation-risks-the-national-center-on-sexual-exploitation-purdue-university-dr-kathryn-seigfried-spellar-chat-app-grooming-social-media-platform)
[platform; Samantha Murphy Kelly, *The dark side of Discord for teens*, *supra* note 8.](https://nbc24.com/news/nation-world/discord-app-raises-safety-concerns-as-experts-warn-of-sexual-exploitation-risks-the-national-center-on-sexual-exploitation-purdue-university-dr-kathryn-seigfried-spellar-chat-app-grooming-social-media-platform)

1 away from home (in at least one reported instance to meet up with an adult met through the
2 platform).¹⁵

3 20. Discord does not provide effective warnings to youth users or parents regarding the
4 unreasonable risk of harm to youth in using the product. It makes it difficult for parents or other
5 visitors of the platform to report CSAM, other inappropriate or harmful content, or predatory user
6 accounts without needing to either log into the platform or have significant information only
7 obtainable from the platform.

8 21. Discord has additional product defects that encourage compulsive use and overuse
9 of its product. For instance, Discord does not provide an option to users to self-restrict time on the
10 platform.

11 22. Youth lack the cognitive ability and life experience to identify online grooming
12 behavior by adults and the psychosocial maturity to decline invitations to exchange sexually
13 explicit or otherwise salacious or violent material and mass-messaging capabilities. At all relevant
14 times, Discord allowed direct messaging with and by youth without parental notification.

15 23. In 2023, Discord finally began to implement additional safety features for youth.
16 In July 2023, Discord launched a Family Center that allows for limited parental monitoring of
17 youth users' activities on Discord.¹⁶ This program is "opt-in," which means youth must choose to
18 include their parents in the Family Center in order for it to be effective. In October 2023, Discord
19 launched the "Teen Safety Assist" initiative to attempt to address some of the risks to youth users.¹⁷
20 Two of the new features include a safety alert to a teen user when a teen user receives a direct
21 message from a user for the first time and a content filter that automatically blurs sensitive content
22 received through a direct or group message.¹⁸

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24 ¹⁵ Samantha Murphy Kelly, *The dark side of Discord for teens*, *supra* note 8.

25 ¹⁶ *Stay Connected with Your Teen Using Discord's Family Center*, Discord Blog (July 11, 2023),
<https://discord.com/blog/discord-family-center-stay-connected-with-your-teen>.

26 ¹⁷ *How We're Making Discord the Best Place to Hang Out and Have Fun with Your Friends*,
27 Discord Blog (Oct. 19, 2023), <https://discord.com/blog/best-place-to-hang-out-with-friends>.

28 ¹⁸ *Id.*

24. Discord’s defective and harmful product features present unreasonable risks of harm to youth users and have directly harmed youth users. Because Discord allows fake usernames, does not verify age, does not facilitate parental controls, and misleads users to believe that there is a “safe” messaging option, youth have been groomed, exploited, and abused by other users through Discord without protection, as well as exposed to harmful content, such as self-harm and violent material.¹⁹ Discord enables sexual predators to text, call, and video chat with youth users and prey on their vulnerabilities.

25. Without the appropriate safety features for youth, youth users have found their way to chat rooms that share information about self-harm or eating disorders, have been subjected to sexual exploitation and manipulation by sexual predators, and have had exploitative content shared via Discord’s servers.²⁰ A June 2023 report found that since Discord’s launch, at least 35 criminal prosecutions involving charges of kidnapping, grooming, or sexual assault and 165 prosecutions related to child sexual abuse included communications using Discord.²¹

26. Discord’s own transparency reports reveal that it received over 416,000 reports related to child safety from October 2023 to December 2023 alone.²² It also received over 895,000 reports for exploitative and unsolicited content.²³

27. Discord’s design features and conduct facilitating the abuse of youth and exacerbating the spread of CSAM have caused Plaintiff to divert and increase resources and expenditures to provide education, counseling, disciplinary, and other social services to harmed youth.

¹⁹ Samantha Murphy Kelly, *The dark side of Discord for teens*, *supra* note 8; Kellen Browning, *supra* note 6.

²⁰ Samantha Murphy Kelly, *The dark side of Discord for teens*, *supra* note 8.

²¹ Ben Goggin, Child predators are using Discord, a popular app among teens, for sextortion and abductions, NBC News (June 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769>.

²² Discord, *Transparency Reports* (Jan. 16, 2024), <https://discord.com/safety-transparency-reports/2023-q4>.

²³ *Id.*

1 **C. Additional Allegations Relating to Defendant Roblox**

2 28. Roblox is a gaming and social media platform. It was created by co-founder and
3 CEO David Baszucki and co-founder and then President of Engineering Erik Cassel (now
4 deceased) in 2004 and publicly launched as an online gaming and social media platform in 2006.

5 29. Social interaction was a core vision for Roblox from the start. In-game chat was
6 added in July 2006 and the “friends” now “connections” was added in September 2006. Features
7 like private messaging and chat groups were added in 2007. Roblox went public in 2021,
8 continuing to emphasize its social networking potential by introducing Spatial Voice chat
9 (allowing gamers to hear each other when they are physically close within the game world) and
10 creating a more immersive communication experience. Roblox incorporates many traditional
11 social media like features such as basic communication capabilities (messaging and voice/video
12 calling). It also launched the “party feature” to facilitate group chats and coordinated gaming. The
13 platform’s architecture enables users to create, share, and monetize user-generated gaming
14 experiences while facilitating real-time communication between participants of all ages. The
15 company describes its product as a “virtual universe” in which users can create and play games,
16 engage with other users, and take part in other online experiences.

17 30. Roblox reports 79.5 million daily active users, including more than half (62%) of
18 all American children under 16 years old.²⁴ Forty-two percent of Roblox users are *preteens*.²⁵
19 Over 40 million children aged 12 and under play games on the platform daily. Nearly 75% of
20 American children ages 9 through 12 regularly play Roblox with friends.²⁶ A December 2017
21 study reported that young children – ages 5 to 9 – spent more time playing Roblox than any other
22

23 _____
24 ²⁴ Taylor Lyles, *Over half of US kids are playing Roblox, and it’s about to host Fortnite-esque*
25 *virtual parties too*, The Verge (July 21, 2020), <https://www.theverge.com/2020/7/21/21333431/roblox-over-half-of-us-kids-playing-virtual-parties-fortnite>.

26 ²⁵ Olivia Carville and Cecilia D’Anastasio, *Roblox’s Pedophile Problem*, Bloomberg (July 22,
2024), <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/>.

27 ²⁶ Shannon Liao, *How Roblox became the ‘it’ game for tweens – and a massive business* (Oct.
28 29, 2020), <https://www.cnn.com/2020/10/27/tech/roblox-explainer/index.html>.

1 online computer activity.²⁷ For children ages 9 through 18, Roblox came second only to
 2 YouTube.²⁸

3 31. The specific product design features of Roblox have exploited – and continue to
 4 exploit – children and adolescents to the detriment of the Commonwealth of Pennsylvania. These
 5 dangerous and harmful design features include, but are not limited to, failure to implement robust
 6 age verification processes to determine users’ ages; failure to implement effective parental
 7 controls; failure to implement effective parental notifications; failure to implement opt-in
 8 restrictions to the length and frequency of use sessions; failure to enable default protective limits
 9 to the length and frequency of use sessions; creating barriers that make it more difficult for users
 10 to delete and/or deactivate their accounts than to create them in the first instance; failure to label
 11 content that has been edited, such as by applying a filter; making filters available to users so they
 12 can, among other things, manipulate their appearance; failure to create adequate processes for users
 13 to report suspected CSAM to Roblox’s platform; and automated attention farming through non-
 14 neutral algorithms and recommendations fed by data about user interactions as well as other
 15 features that promote addictive and excessive use.

16 32. Extensive research supports the addictive nature of gaming, especially for youth.
 17 Stanford Professor and addiction specialist, Dr. Anna Lembke, in her 2021 book on addiction titled
 18 “Dopamine Nation,” describes video games as “digital drugs” with high-dopamine, engineered
 19 rewards that can become compulsive and produce feelings of withdrawal just like substances. She
 20 explains how games are engineered to interfere with the brain’s pleasure-pain balance, causing
 21 users to experience periods of high dopamine followed by a “crash” that leads to more cravings
 22 and eventually a destructive cycle of addictive use.²⁹

23
 24 ²⁷ *Roblox Emerges as a Top Online Entertainment Platform for Kids and Teens in 2017* Roblox
 25 (Mar. 21, 2018), <https://ir.roblox.com/news/news-details/2018/Roblox-Emerges-as-a-Top-Online-Entertainment-Platform-for-Kids-and-Teens-in-2017/default.aspx>.

26 ²⁸ Ari Levy, *While parents Zoom, their kids are flocking to an app called Roblox to hang out and*
 27 *play 3D games*, CNBC (Apr. 8, 2020), <https://www.cnbc.com/2020/04/08/roblox-is-seeing-a-surge-during-coronavirus-shelter-in-place.html>.

28 ²⁹ Anna Lembke, MD, *Dopamine Nation: Finding Balance in the Age of Indulgence* (Dutton
 2021); see also S.M. Grusser et al., *Excessive computer game playing: evidence for addiction and*
 SUPPORTING ALLEGATIONS REGARDING AMENDED SHORT-FORM COMPLAINT AND

33. Roblox benefits from the addictive nature of both gaming and social media by leveraging user engagement to drive platform growth and user retention. It capitalizes on the social connection and community aspects of these activities to keep more users on the platform for longer, as seen with its integration of social gaming and its role as a communication hub where users exchange billions of chat messages daily. Roblox employs algorithms to help personalize user experience, which includes functions like gaming recommendations, search features, and notifications. The algorithms make “People You May Know” recommendations and notifications to alert users about friend activity or in-experience events, further driving engagement (including youth engagement).

34. Roblox is capitalizing on the addictive nature of both the social and gaming aspects of its platforms. Roblox encourages users, including kids, to spend money on in-game purchases.³⁰ Users purchase Robux (a Roblox currency) to pay for virtual goods or experiences within the game, including the ability to personalize their virtual avatars with unique clothing or styles. The longer players are engaged the more potential for Roblox to sell Robux. Roblox currently faces a government complaint in the European Union (“EU”) over tricking young players into spending money.³¹ Roblox went public via direct listing in 2021. Roblox’s stock price is buoyed by the platform’s potential to increase advertising revenue given the size of its user base and the hours users spend online.³² To maximize potential profit, the application is designed to keep its users, including children, engaged for as long as possible so as to maximize online purchasing and ad revenue.

aggression?, 10 CyberPsych. & Behav. 290, 291 (2007), <https://pubmed.ncbi.nlm.nih.gov/17474848/>.

³⁰ Katherine Latham, *How computer games encourage kids to spend cash*, BBC (May 15, 2023), <https://bbc.com/news/business-65372710>.

³¹ Foo Yun Chee, *Videogame firms hit with EU complaint over ‘tricking consumers,’* Reuters (Sep. 12, 2024), <https://www.reuters.com/technology/videogame-firms-hit-with-eu-complaint-over-tricking-consumers-2024-09-11/>.

³² *Roblox stock gains favor as analyst points to future ad growth and developer changes*, Investing.com (Oct. 28, 2024), <https://in.investing.com/news/company-news/roblox-stock-gains-favor-as-analyst-points-to-future-ad-growth-and-developer-changes-93CH-4492474>.

35. Roblox has designed and promoted its platforms to attract, capture, and addict youth, because the more active and invested users are, the more likely they are to pay for Robux. Roblox, with its chat functions and interactive games, is a *de facto* social network for children. Roblox markets its product specifically to children and their parents. For example, Roblox has encouraged schools and other organizations to use Roblox as a tool to teach kids coding, highlighting “Roblox Educators” on their website.³³

36. Roblox has not only designed features to induce compulsive use by young people, but it has simultaneously failed to adequately warn of harm to youth on its platform and to reasonably protect youth from harm on its platform. Roblox has not and does not adequately warn parents and the public of the following risks to youth on its platform:

- the defective reporting structures to address the prevalence of child sexual exploitation, grooming, sextortion, and distribution of known CSAM on the platform. According to a report from the National Center on Sexual Exploitation (“NCOSE”), many of the games on Roblox contain sexually explicit themes, including strip clubs and dance clubs. Users under 13 years old have access to much of this adult content.³⁴ Nor does Roblox warn about individual child predators and networks of predators of whom Roblox is made aware are preying on children and teens on the platform; Youth have reported being lured into virtual sexual experiences, including so-called “condo experiences,” which involve visiting someone’s “home,” and then being invited into the “bedroom” for virtual sexual acts. The NCOSE also reported children playing a so-called “rape game,”³⁵ and an investigation by Revealing Reality described using a youth account to access games where players engage in sexual and fetish acts while able to communicate with adult users.³⁶

³³ See Roblox, Education | Roblox, *A new era of engaged learning*, <https://education.roblox.com/educators/tps://create.roblox.com/docs/education/resources/roblox-educators> (last visited Jan. 8, 2026).

³⁴ *Roblox: Inflated Key Metrics For Wall Street And A Pedophile Hellscape For Kids*, Hindenburg Research (Oct. 8, 2024), <https://hindenburgresearch.com/roblox/>.

³⁵ Letter from Patrick Truman & Dawn Hawkins, Nat’l Ctr. of Sexual Exploitation, to David Baszucki, Founder & CEO, Roblox (May 1, 2023), https://endsexualexploitation.org/wp-content/uploads/Roblox-Notification-Letter_DDL-2023_FINAL.pdf.

³⁶ Libby Brooks & Jedidajah Otte, *Risks to children playing Roblox ‘deeply disturbing’, say researchers*, The Guardian (Apr. 14, 2025), <https://www.theguardian.com/technology/2025/apr/14/risks-children-roblox-deeply-disturbing-researchers>.

- 1 • youth addiction and excessive use of the platform facilitated by integrations with
- 2 gaming and other social media applications with addictive features;
- 3 • the defective reporting structures to address the open solicitation of sexual favors
- 4 from children and the trading of child pornography, often offering Robux in
- 5 exchange for explicit photos.³⁷ Users also create porn videos in Roblox Studio,
- 6 giving rise to a new genre of “animated” porn.
- 7 • the ineffective parental controls and defective reporting structures to address the
- 8 Roblox design features that allows users, including those under age 9, encounter
- 9 sexually explicit images, hate speech, or violent content in all-ages experiences.
- 10 For example, one game is titled “Beat Up Homeless Outside 7/11 Simulator.”
- 11 Others include, “Escape to Epstein Island” and “Diddy Party,” with over 600
- 12 “Diddy” games, including “Survive Diddy” and “Run From Diddy Simulator.”
- 13 Other games with no age restrictions included, “[GUNS] Work at a Hospital” where
- 14 users can go on a hospital shooting rampage, and “Palestine and Israel Hangout,”
- 15 where users can purchase weapons and attack each other.³⁸
- 16 • ineffective age verification on the platform;
- 17 • ineffective reporting structures on the platform generally; and
- 18 • ineffective parental notifications and controls on the platform. Indeed, employees
- 19 face pressure to avoid implementing safety features that cause users to leave the
- 20 platform or otherwise reduce engagement.³⁹

21 37. Roblox has wholly failed to keep children safe on its platform. Roblox has failed

22 to report CSAM on its servers to the National Center for Missing & Exploited Children

23 (“NCMEC”) as required by law (42 U.S.C. §13032; 18 U.S.C. §2258A). Deeply disturbing

24 research has exposed how easy it is for children to encounter highly inappropriate content and

25 interact unsupervised with adults seeking to sexually groom and exploit them.⁴⁰ Although the

26 company is aware that the platform allows adult predators to reach children, Roblox has failed to

27 verify the age and identity of its users. It has failed to require parental approval for underage users

28 of its platform. It has taken less than one minute to create an account.

³⁷ *Roblox: Inflated Key Metrics For Wall Street And A Pedophile Hellscape For Kids*, *supra* note 34.

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ Brooks & Otte, *supra* note 36.

38. Roblox has rejected safety features that current and former employees recommended.⁴¹ For example, the company rejected pop-up safety notices and defaulting safety settings to disallow users from talking to strangers. According to some employees, the company is too reliant on artificial intelligence (“AI”) to moderate chats even though the technology is not capable of detecting subtle signs of grooming.⁴² The company, including top management, also rejected a proposal by its employees that would have required users under 13 years old to sign up with a parent’s approval and provide a parent’s email address.⁴³

39. Child sexual abuse is rampant on Roblox. In 2023, Roblox (under)reported over 13,000 incidents to the NCMEC, according to the Bloomberg report.⁴⁴ Widespread abuse is further evidenced by the sheer number of arrests since 2018 stemming from perpetrators targeting minor victims on Roblox for sexual exploitation.⁴⁵

40. As across the nation, youth in the Commonwealth of Pennsylvania have been victims of sexual abuse after being targeted on Roblox. A Bucks County family has alleged that the platform enabled a sexual predator to target and exploit their then 13-year-old-son. The family alleges that an adult, posing as another child, sent the victim explicit content and coerced the boy into sending graphic images in return.⁴⁶ In another incident, the Bucks County District Attorney Joe Khan successfully prosecuted a 32 year old resident who made contact with children who lived out of state using the Roblox in app chat feature in order to solicit sexually explicit photos and videos of those children. Relying on Roblox’s lax platform safety features, the sexual predator admitted to posing as a teenage boy on Roblox to make contact with children, before moving their

⁴¹ Carville and D’Anastasio, *supra* note 25.

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ *Bucks County family sues Roblox, claims platform enabled sexual predator to target, exploit son*, 6abc Action News (Oct. 29, 2025), <https://6abc.com/post/bucks-county-family-sues-roblox-claims-gaming-platform-enabled-sexual-predator-target-exploit-son/18085444/>.

1 conversations off to other platforms where he would send and receive numerous explicit images,
 2 messages and videos. Roblox content moderation failed to stop his abuse; he was only thwarted
 3 when the victim's mother found the messages and the Commonwealth intercepted his phone.⁴⁷
 4 The sexual predator and Bucks County resident pled guilty to multiple felony charges stemming
 5 from the incident, including felony counts of sexual abuse of children, possession of child abuse
 6 material, unlawful contact with a minor, dissemination of explicit sexual material to a minor, and
 7 unlawful contact with a minor and was sentenced on June 3, 2026.

8 41. Other incidents of harm have been reported in Pennsylvania and surrounding areas.
 9 A Philadelphia, Pennsylvania mother filed a lawsuit against Roblox after learning that her 12-year
 10 old daughter was groomed by a man she met online while playing Roblox.⁴⁸ The man befriended
 11 her on Roblox after tricking her into believing he was a minor and coerced the girl to send him
 12 explicit photos and videos of herself on another messaging application. After she pushed back, he
 13 threatened to release the materials online.⁴⁹ Another minor under the age of 13 was sexually
 14 assaulted numerous times between 2022 and 2025 in Clinton and Centre Counties, Pennsylvania
 15 by a man who would then deposit money into the victim's Roblox account.⁵⁰ A 14-year-old victim
 16 in Altoona, Pennsylvania was similarly groomed and abused after being targeted on Roblox by a
 17 man from across the country.⁵¹ The perpetrator, after posing as a 13-year-old on the platform,
 18 travelled to Pennsylvania from California to sexually abuse the victim.

19
 20 ⁴⁷ Jo Ciavaglia, *Upper Southampton Man Allegedly Solicited Underage Girls Using Roblox*
 21 *Gaming App*, Bucks County Courier Times (Mar. 21, 2025), <https://www.yahoo.com/news/upper-southampton-man-allegedly-solicited-185943544.html>.

22 ⁴⁸ Abraham Gutman, *A Philly girl was 'sextorted' by a man she met on Roblox. The gaming*
 23 *platform is facing other lawsuits.* (Sep. 30, 2025), <https://www.inquirer.com/news/philadelphia/lawsuit-roblox-minecraft-fortnite-sexual-exploitation-20250930.html>.

24 ⁴⁹ *Id.*

25 ⁵⁰ Courtney Raynor, *Centre County man charged, accused of assaulting child*, WTaj (Sep. 24,
 26 2025), <https://www.wtaj.com/crime/centre-county-man-charged-accused-of-assaulting-child/>.

27 ⁵¹ Bill Shannon, *Man traveled across the country to sleep with Altoona teen, police report*, WTaj
 28 (Mar. 14, 2023), <https://www.wtaj.com/news/local-news/man-traveled-across-the-country-to-sleep-with-altoona-teen-police-report/>.

42. In yet another incident in January 2026, an intellectually disabled teenager from Philadelphia, Pennsylvania went missing when he was reportedly contacted by an adult man on Roblox and lured to San Diego, California where Philadelphia police later found him.⁵²

43. In 2023, a 16-year-old boy from Cumberland County, Pennsylvania was targeted on Roblox by a man from California.⁵³ After the minor victim ended their online relationship, the man harassed the boy by causing local Cumberland County law enforcement to respond to dozens of false reports claiming that someone had a gun and had killed, or was about to kill, another person at the victim's address.⁵⁴ The perpetrator also made a false report to a suicide prevention worker that the minor victim had placed pipe bombs in Cumberland County schools. As a result, approximately 650 students and school staff were evacuated.⁵⁵

44. In nearby Trenton, New Jersey, a man sexually assaulted a 12-year-old girl he met on Roblox in the fall of 2025.⁵⁶ Another 14-year-old girl in Ohio was sexually assaulted by a man she met on Roblox. The man posed as a 17-year-old on the platform and convinced the girl to send him nude images before picking her up from school and sexually assaulting her. One 48-year-old registered sex offender in Kansas lured an 8-year-old girl into giving him 20 explicit images and videos she had shot of herself using her iPad with the promise of exchanging Robux.⁵⁷ And, in May 2025, a 13-year-old Iowa minor was abducted by a 37-year-old predator whom she

⁵² Abigail Adams, *Missing Teen With Intellectual Disability May Have Been 'Lured' Away From Home Through Roblox*, People (Jan. 16, 2026), <https://people.com/missing-teen-with-intellectual-disability-may-have-been-lured-away-from-home-through-roblox-11886873/>.

⁵³ U.S. Attorney's Office, Middle District of Pennsylvania, *California Man Sentenced To 78 Months In Prison For Distribution Of Child Pornography And Making A Hoax Bomb Threat In Connection With Retaliation Against A Minor*, (May 21, 2025), <https://www.justice.gov/usao-mdpa/pr/california-man-sentenced-78-months-prison-distribution-child-pornography-and-making>.

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ David Chang, *NJ Man Accused of Sexually Assaulting 12-Year-Old Girl*, NBC10 Philadelphia (Jan. 12, 2026), <https://www.nbcphiladelphia.com/news/local/nj-man-accused-of-sexually-assaulting-12-year-old-girl/4331744/>.

⁵⁷ *Id.*

1 encountered through Roblox communications, with the perpetrator subsequently facing charges
2 for aggravated rape.

3 45. Former Meta researcher Cayce Savage (“Savage”) testified during a September
4 2025 Senate hearing that Roblox was being exploited by “pedophile networks” on Meta’s virtual
5 reality (“VR”) platforms.

6 46. So-called “assassination simulators” began popping up on Roblox shortly after the
7 horrific assassination of Charlie Kirk at Utah Valley University. Children as young as five years
8 old were able to access animated bloody depictions of the shooting.

9 47. In October 2025, the State of Florida issued criminal subpoenas against Roblox⁵⁸
10 over allegations that Roblox was aiding sexual predators:

11 “Platforms like Roblox have become breeding grounds for predators to gain access
12 to our kids,” said Attorney General James Uthmeier in a news release. “We will
13 stop at nothing in the fight to protect Florida’s children, and companies that expose
14 them to harm will be held accountable.”

15 These criminal charges came on the heels of a civil investigation launched by the State of Florida
16 into Roblox in April 2025 demanding information about its child protection policies. The State of
17 Kentucky also filed suit in October 2025, naming Roblox the “Website of Choice for Child
18 Predators.”⁵⁹

19 48. In May 2026, the State of Connecticut launched an investigation against Roblox.
20 During a press conference, Attorney General William Tong stated, “Roblox has become a
21 predator’s playground, a place where adults, where people who want to do harm for children, go
22 looking for our kids to take advantage of them, to harm them.”⁶⁰

23 ⁵⁸ Christie Zizo, *Florida issues criminal subpoenas against Roblox over allegations of aiding*
24 *sexual predators*, NEWS 6 (Oct. 20, 2025), <https://www.clickorlando.com/news/local/2025/10/20/florida-issues-criminal-subpoenas-against-roblox-over-allegations-of-aiding-sexual-predators/>.

25 ⁵⁹ Kevin Grout, *Attorney General Coleman Sues Roblox: ‘Website of Choice for Child*
26 *Predators’*, Kentucky.gov (Oct. 7, 2025), <https://www.kentucky.gov/Pages/Activity-stream.aspx?n=AttorneyGeneral&prld=1832>.

27 ⁶⁰ P.R. Lockhart, *CT launches investigation into Roblox, with focus on child safety*, CT Mirror
28 (May 26, 2026), <https://ctmirror.org/2026/05/26/ct-investigation-roblox-attorney-general-william-tong/>.

49. Roblox's ineffective parental controls and reporting system and other design features facilitating the abuse and grooming of youth and exacerbating the spread of CSAM, as well as its failure to warn parents and the public at large of the full extent of harm to youth on its platform, have caused the Commonwealth of Pennsylvania to expend significantly more resources investigating and prosecuting these types of criminal harms.

50. Roblox generates revenue exceeding \$3.6 billion annually.

51. Roblox partners with Meta partners to target youth on its Quest platform. Roblox has a native application available for download in the Meta VR app store. In her September 9, 2025 testimony to Congress, Savage stated that Meta prioritized profit over safety, and specifically, that her research had identified that Roblox was being used by coordinated pedophile rings. "I flagged this to Meta and said that under no circumstances should we host the app Roblox on the [Meta] headset," Savage testified, noting that Roblox is *still* available on the Meta Quest platform.⁶¹ She testified that Meta knew children were using VR products despite the company's stated age restriction and that Meta affirmatively shut down internal research showing children were being exposed to sexually explicit material on the platform and altered or deleted data showing as much.⁶²

52. Roblox can be integrated with other platforms, such as Discord, which functions as a voice chat service for other social media platforms, or gaming platforms. Roblox works together with Discord to allow users to integrate their Discord account through the Discord application alone. This allows for child users who play video games on Roblox to more easily voice chat with other users. None adequately warn of the harms to youth prevalent on their own or their partner's platform.

⁶¹ Lily Jamali, *Meta covered up potential child harms, whistleblowers claim*, BBC (Sep. 9, 2025), <https://www.bbc.com/news/articles/c5y8x3md05no>; *Statement of Cayce Savage*, U.S. S. Comm. on the Judiciary, Subcomm. on Priv., Tech., and L. (Sep. 6, 2025), <https://www.judiciary.senate.gov/imo/media/doc/6ccd5abd-cbb9-5107-d48d-b99e821eb244/2025-09-09%20-%20Testimony%20-%20Savage1.pdf>.

⁶² *Id.*

53. Roblox partners with Google to expand its advertising reach through Google’s ad-delivery systems and immersive video ad formats. This collaboration enables Roblox to target young audiences across Google’s platform, particularly YouTube, funneling youth users toward Roblox content and gameplay experiences. The integration of Roblox advertising within Google’s youth-oriented ecosystems directly enhances Roblox’s ability to acquire and retain underage users. Neither adequately warns of the harms to youth prevalent on their own or their partner’s platform.

54. Roblox, through its leadership, has affirmatively promised for over a decade that child safety was its “number one priority” and a “foundational” principle; that it has implemented “industry-leading standards” for child protection; and that it would promote “safety over growth.” For instance, in 2011, CEO David Baszucki affirmatively promised that the amount of moderation on the Roblox platform made it safe for kids: “There is a fair amount of moderation on the site, not only for legal reasons, but for moral ones as well.”⁶³ He went on, “We look out for bullying and just overall safety for the kids.”⁶⁴ And as recently as November 2025, on a podcast with the New York Times, Baszucki re-affirmed: “Roblox is an amazing platform right now for your kid.”⁶⁵

55. Roblox has falsely assured parents and the public about the safety of its platform for youth – despite having knowledge of the prevalence of harm to youth on its platform. For example, the Roblox website claims: “Roblox is free to play and safe for kids aged 4+.” And elsewhere on the website, Roblox asserts: “Safety and civility are foundational to this vision and creating a platform where everyone feels welcome. That’s why we’ve always made it a key priority to encourage community members to connect, create, and come together in a space that is welcoming, safe, inclusive and respectful. We’ve spent over a decade building a stringent safety system and policies that we are proud of and that we are continuously evolving as our community

⁶³ Elizabeth Culley, *San-Mateo based gaming site Roblox popular with kids*, The Mercury News (Apr. 4, 2011), <https://www.mercurynews.com/2011/04/04/san-mateo-based-gaming-site-roblox-popular-with-kids/>.

⁶⁴ *Id.*

⁶⁵ Kevin Roose, Casey Newton & Rachel Cohn, *We asked Roblox’s C.E.O. About Child Safety. It Got Tense*, N.Y. Times (Nov. 21, 2025), <https://www.nytimes.com/2025/11/21/podcasts/hardfork-roblox-child-safety.html>.

grows.”⁶⁶ Roblox’s affirmative misrepresentations are false and create a misleading sense of safety for parents and the public.

56. Roblox states on its website:

“Roblox aims to provide a safe and positive environment for all users, especially children. We take the safety of our youngest users seriously, appreciating how top of mind internet safety is for parents and policymakers. Our platform is designed with safety in mind, and we continually evolve our practices to address emerging challenges.”⁶⁷

“To ensure a safe and enjoyable environment for everyone, especially our younger users, Roblox employs various age checks across the platform.”⁶⁸

57. In fact, the age verification system Roblox adopted in 2021 was optional. Even the newer 2025 policy is ineffective because it applies only to certain communication features like “Chat with Voice.”

58. Roblox CEO David Baszucki echoed these safety assurances in an April 2025 interview when asked about its safeguards for youth users:

Q: Roblox has a big, young user base. You get a lot of criticism about it. Sometimes the concerns are about grooming on the platform. Some parents just think the games are uncouth or just don’t like the idea of kids talking to other kids in an unregulated way. Has your thinking about the issue of kids on your platform changed, or has it been consistent since you started?

Baszucki: For us, literally in the first few months of being live, we started building our first safety systems and made it a top priority. . . . That has evolved over the last 16 to 18 years to the development of ***over 200 AI systems, automatic filtering of all text on the platform, automatic filtering with human supplement of all images on the platform.*** I would say over time we have gotten better, better, better, better, better. [But] any single issue for us is one too many.⁶⁹

⁶⁶ *Safety & Civility at Roblox*, <https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox>.

⁶⁷ Roblox, *Child Safety on Roblox*, <https://corp.roblox.com/resource/child-safety> (last visited Jan. 8, 2026).

⁶⁸ Roblox, *Understanding Age Checks on Roblox*, <https://en.help.roblox.com/hc/en-us/articles/39143693116052-Understanding-Age-Checks-on-Roblox> (last visited Jan. 8, 2026).

⁶⁹ Peter Kafka, *Roblox CEO says he wants to protect your kids – but you’re going to need to pitch in, too*, Bus. Insider (Apr. 23, 2025), <https://www.businessinsider.com/roblox-games-ceo-parents-kids-rules-responsible-age-moderation-2025-04>.

59. A few months later, Baszucki again warranted to the public that Roblox was safe in a discussion about harms to children on the platform:

Q: Can you tell a parent listening out there that what they've heard has happened to young children now cannot happen anymore in "Roblox"?

Baszucki: We have almost 3,000 people in our company. We all have kids playing on the platform all the time. I've had four kids who have grown up playing on the platform, and we've put it as the top priority. ***Ultimately, 'Roblox' is the safest place for anyone on the internet.***⁷⁰

60. Not only does Roblox claim that its platform is safe for recreational use, but it also endorses the use of Roblox for educational purposes, further assuring parents and educators that the platform is safe for youth users. Roblox's own website features a guide for teachers on how to, "use Roblox as an educational tool" in the classroom, where it states:

We prioritize safety and privacy[.] Roblox works with parents, educators, and digital safety experts to promote a welcoming environment for everyone. Our software includes features such as chat filters, private servers, and extensive content moderation.⁷¹

But despite these claims of safety, users still continue to report instances of widespread and repeated abuse on the platform, and that the safeguards in place appear to be insufficient. For example, a recent article from *The Guardian* titled, "My chilling week on Roblox: sexually assaulted and shat on as a child avatar roaming the online world," described an investigator's experience playing Roblox with the parental control settings turned on, choosing to play the popular game within the platform, "Dress to Impress." While Roblox designates the game as safe for users aged 5 and above, the investigator explains, "[i]n my short time there my avatar is cyberbullied, aggressively killed, sexually assaulted and shat on – ***all with parental control settings in place.***"⁷²

⁷⁰ WBUR, *Roblox CEO on platform's safety efforts as Congress works to protect kids online* (July 23, 2025), <https://www.wbur.org/hereandnow/2025/07/23/roblox-ceo-david-baszucki>.

⁷¹ *Educator Onboarding, Intro to Roblox*, Roblox, <https://create.roblox.com/docs/en-us/education/educator-onboarding/1-intro-to-roblox>.

⁷² Sara Martin, *My chilling week on Roblox: sexually assaulted and shat on as a child avatar roaming the online world*, *The Guardian* (Nov. 5, 2025), <https://www.theguardian.com/games/2025/nov/05/roblox-game-robux-children-child-kids-safety-parental-controls>.

D. Additional Allegations Relating to Defendant X Corp.

61. Defendant X Corp.⁷³ is a social media platform. It was founded by Jack Dorsey (“Dorsey”), Noah Glass, Biz Stone, and Evan Williams and publicly launched in July 2006 as “Twitter,” a social networking service for users to quickly disseminate short-form messages (under 140 characters) to their followers and others on the platform. The company went public on November 7, 2013. Elon Musk (“Musk”) purchased Twitter on October 27, 2022 and rebranded the company as X Corp. in July 2023. Defendant X Corp. enables users to interact online in posts often still called “tweets.” Posts include photos, videos, GIFs, and voice memos.

62. The website “x.com” is one of the five most visited websites in the world. The X Platform has a user base of over 600 million monthly active users, with 42% of Americans aged 12-34 using the platform. Gen Z is the largest category of users on the X Platform with a 12% increase from 2022 to 2024.⁷⁴ Approximately 23% of teens in the United States (more than 21 million) reported using the X Platform in 2022.⁷⁵ The X Platform saw a 6.9% quarterly increase of brand equity among Gen Z users in the third quarter of 2024.⁷⁶ Over 30% of 7-9 year olds were reported as having an X Corp. account in 2024.⁷⁷

63. The specific design features of the X Platform exploit children and adolescents to the detriment of the Commonwealth of Pennsylvania. These dangerous and harmful design features include, but are not limited to, failure to implement robust age verification processes to

⁷³ X Corp. refers herein to the current company, X Corp., and its predecessor company, Twitter.

⁷⁴ This growth coincided with a turbulent time for the company during which control of the company changed, and many existing safety policies and guardrails were removed as a result. To date, there is no meaningful evidence that they have been replaced.

⁷⁵ Sara Atske, *Teens, Social Media and Technology 2024*, Pew Rsch. Ctr. (Dec. 12, 2024), <https://www.pewresearch.org/internet/2024/12/12/teens-social-media-and-technology-2024/>.

⁷⁶ Christina Newberry, *X (Twitter) stats that markets need to know in 2025*, Blog (Mar. 20, 2025), <https://blog.hootsuite.com/twitter-statistics/>.

⁷⁷ Sarah Perez, *A surprising number of ‘iPad Kids’ are on X, study finds*, TechCrunch (Aug. 19, 2024), <https://techcrunch.com/2024/08/19/a-surprising-number-of-ipad-kids-are-on-x-study-finds>. The study further notes that “[t]he report noted that X could expose these younger kids to hate speech, pornography and disinformation, pointing to reports that indicate that 13% of all X posts feature adult content.”

1 determine users' ages; failure to implement effective parental controls; failure to implement
 2 effective parental notifications; failure to implement opt-in restrictions to the length and frequency
 3 of use sessions; failure to enable default protective limits to the length and frequency of use
 4 sessions; creating barriers that make it more difficult for users to delete and/or deactivate their
 5 accounts than to create them in the first instance; failure to label content that has been edited, such
 6 as by applying a filter; making filters available to users so they can, among other things, manipulate
 7 their appearance or that of others;⁷⁸ failure to create adequate processes for users to report
 8 suspected CSAM to Defendants' platforms; and automated attention farming through non-neutral
 9 algorithms and recommendations fed by data about user interactions as well as other features that
 10 promote addictive and excessive use.

11 64. X Corp. has affirmatively promised the public that it has zero tolerance towards
 12 any material that features or promotes child sexual exploitation.⁷⁹ It has also affirmatively
 13 promised that it "will not tolerate behavior intended to harass, intimidate, or use fear to silence
 14 another user's voice," that it would "continue to take action on accounts that cross the line into
 15 abuse";⁸⁰ that safety was "one of [their] top five priorities"⁸¹ and that they would "continu[e] to
 16 invest heavily in improving our tools and enforcement systems to better allow us to identify and
 17 take faster action on abuse as it's happening and prevent repeat offenders."⁸² X Corp. also
 18 promised it had and would expand teams working to keep people safe and yet Musk was forced to
 19

20 ⁷⁸ See, e.g., A.J. Vicens & Raphael Satter, *Elon Musk's AI floods X with sexualized photos of*
 21 *women and minors*, Reuters (Jan. 3, 2026), <https://www.reuters.com/legal/litigation/grok-says-safeguard-lapses-led-images-minors-minimal-clothing-x-2026-01-02/>.

22 ⁷⁹ *Child safety*, X Help Center (May 2024), <https://help.x.com/en/rules-and-policies/child-safety>

23 ⁸⁰ *Twitter Changes its Policy on Violent Posts*, CNN Wire (Dec. 30, 2015),
 24 <https://fox40.com/news/twitter-changes-its-policy-on-violent-posts/>.

25 ⁸¹ Christine Wang, *Jack Dorsey said online harassment 'has no place on Twitter'*, CNBC (July
 26 26, 2016), <https://www.cnbc.com/2016/07/26/jack-dorsey-said-online-harassment-has-no-place-on-twitter.html>.

27 ⁸² *How Twitter's Working to Reinvigorate the Platform (and the Results Thus Far)*, Social Media
 28 Today (July 25, 2016), <https://www.socialmediatoday.com/social-networks/how-twitters-working-reinvigorate-platform-and-results-thus-far>.

1 admit in 2022 that “almost no one was working on child safety.”⁸³ These and other repeated
 2 affirmative promises are false and have mislead parents, schools, and the public about the inherent
 3 safety of the X Platform for youth.

4 65. X Corp. has failed to report CSAM on its servers to the NCMEC as required by law
 5 (42 U.S.C. §13032; 18 U.S.C. §2258A). The X Platform has a wholly ineffective reporting
 6 structure. Historically, the X Platform reported only a small fraction of the CSAM it flagged
 7 internally. Moreover, independent investigations have repeatedly found known illegal material on
 8 the X Platform that it failed to flag or report. Researchers at the Stanford Internet Observatory
 9 found that X Corp. failed to prevent dozens of known, previously flagged images of child abuse
 10 from being posted, indicating a lapse in basic enforcement. Investigative reports by The New York
 11 Times and Alliance4Europe identified coordinated networks openly soliciting and selling CSAM
 12 on the X Platform. In one instance, a network shared millions of posts that continued largely
 13 undisturbed for months during 2025.

14 66. NCMEC officials testified to Congress in March 2025 that X Corp. reported 20%
 15 less reports in 2024 than they did in 2023 despite an increasing trend nationally. They further
 16 reported that deficiencies ranged from inadequate detection of some of the most egregious crimes
 17 against children (i.e., online enticement and sextortion) to the inadequate detection of online
 18 enticement, arbitrary limits on the information provided in reports, and “bulk reporting” of
 19 information that delays law enforcement investigations.⁸⁴ X Corp. has been criticized for refusing
 20
 21

22 ⁸³ Brie Stimson, *Twitter feud has Elon Musk, Jack Dorsey arguing over platform’s child safety*
 23 *protections*, Fox News (Dec. 9, 2022), [https://www.foxnews.com/tech/twitter-feud-elon-musk-](https://www.foxnews.com/tech/twitter-feud-elon-musk-jack-dorsey-arguing-platforms-child-safety-protections)
 24 *jack-dorsey-arguing-platforms-child-safety-protections*; see also Anthony Ha, *Jack Dorsey says*
 25 *it’s time to rethink the fundamental dynamics of Twitter*, TechCrunch (Apr. 16, 2019),
<https://techcrunch.com/2019/04/16/jack-dorsey->
[ted/#:~:text=Dorsey%20discussed%20steps%20that%20Twitter%20has%20taken,and%20condit](https://techcrunch.com/2019/04/16/jack-dorsey-)
[ions%20to%20make%20them%20%22human%20readable%22.](https://techcrunch.com/2019/04/16/jack-dorsey-)

26 ⁸⁴ *The World Wild Web: Examining Harms Online*, U.S. H. Energy and Com. Comm. Subcomm.
 27 *on Com., Mfg., and Trade* (Mar. 26, 2025) (Testimony of Y. Souras, Chief Legal Officer,
 28 NCMEC), [https://www.congress.gov/119/meeting/house/118066/witnesses/HHRG-119-IF17-](https://www.congress.gov/119/meeting/house/118066/witnesses/HHRG-119-IF17-Wstate-SourasY-20250326.pdf)
[Wstate-SourasY-20250326.pdf](https://www.congress.gov/119/meeting/house/118066/witnesses/HHRG-119-IF17-Wstate-SourasY-20250326.pdf).

1 to grant some child protection agencies access to its Application Programming Interface to scan
2 for CSAM, while simultaneously selling that same access to advertisers.

3 67. The X Platform utilizes algorithms, endless scrolls and other features designed to
4 maximize user engagement in ways that are addictive and harmful to youth. Foundational to the
5 X Platform is the infinite scroll by which it uses algorithmic design to provide intermittent variable
6 rewards (“IVRs”) or dopamine hits from interactions such as likes, replies, and new content to
7 maximize user engagement and ad revenue, which makes up the majority of the company’s
8 revenue. X Corp. profits from its own platform designs that monetize self-harm, sex trafficking,
9 CSAM, and other content harmful to youth. Such activity has been found to increase feelings of
10 anxiety, depression, poor body image, and loneliness among youth. X Corp. is contributing to the
11 mental health epidemic among our nation’s youth, including Commonwealth of Pennsylvania
12 students.

13 68. In addition to the addictive design of the X Platform, other dangerous and harmful
14 design features include, inter alia, a lack of reliable age verification to determine users’ ages;
15 failure to implement effective parental controls; failure to implement effective parental
16 notifications; failure to provide options to users to self-restrict time used on the platform; failure
17 to implement reporting protocols to allow users or visitors on the X Platform to easily, efficiently,
18 and effectively report CSAM and adult predator accounts; and a lack of child safety precautions
19 to protect its youth users.

20 69. X Corp. does not have reliable age verification tools in place to protect youth. In
21 September 2023, X Corp. rolled out an identification verification feature only available to the
22 platform’s paid subscribers. X Corp. notes that it uses the feature for (a) user experience
23 enhancement; and (b) safety and security purposes. In other words, X Corp. was capable of
24 verifying a user’s age and identity, but elected only to verify users with paid subscriptions. X Corp.
25 states that the current focus of account authentication is “to prevent impersonation,” and that the
26 company does not have but “may explore additional measures, such as ensuring users have access
27
28

1 to age-appropriate content and protecting against spam and malicious accounts to maintain the
2 integrity of the platform and safeguard healthy conversations.”⁸⁵

3 70. X Corp. has long been aware of harm caused by the platform including to youth.
4 Indeed, in X Corp.’s early years, as engagement grew, senior executives and employees confronted
5 widespread and escalating issues of abuse, harassment, and misinformation. Former executives
6 recently acknowledged their early knowledge of rampant abuse, but stated that safety was not a
7 priority.⁸⁶ For example, Del Harvey (“Harvey”), Vice President of Trust and Safety from 2008 to
8 2021, recounted, “[W]e always had concerns about what behaviors could develop.” And Jason
9 Goldman, Vice President of Product from 2007 to 2010, noted that the company was so focused
10 on adding users, it ignored the harm: “[T]here was such a focus at this time in the company on
11 getting more users in the top of the funnel. We had a real willing blindness to a lot of abuse that’s
12 always happened on the platform.”⁸⁷

13 71. According to Harvey and Leslie Miley (“Miley”), an Engineering Manager from
14 2013 to 2015, Twitter lacked “robust tools to deal with abuse.”⁸⁸ Harvey conceded safety was not
15 prioritized: “The problem for Twitter at the time was that, unfortunately, we did not invest a lot in
16 Trust & Safety.”⁸⁹ Miley reflected, “Honestly, a lot of the tooling that was written to fight [abuse]
17 was written by interns. Just – it just wasn’t a priority.”⁹⁰ According to journalist Lauren Goode
18 who covered Twitter during this time, management’s disinterest in addressing the safety of its
19 users went all the way to the top, including to then-CEO Dorsey, who was inconsistent in
20

21 ⁸⁵ Ivan Mehta, *X launches account verification based on government ID*, TechCrunch (Sep. 15,
22 2023), [https://techcrunch.com/2023/09/15/x-launches-account-verification-based-on-](https://techcrunch.com/2023/09/15/x-launches-account-verification-based-on-government-id/#:~:text=%E2%80%9CX%20currently%20focuses%20on%20account,as%20ensuring%20users%20have%20access.)
23 [government-](https://techcrunch.com/2023/09/15/x-launches-account-verification-based-on-government-id/#:~:text=%E2%80%9CX%20currently%20focuses%20on%20account,as%20ensuring%20users%20have%20access.)
[id/#:~:text=%E2%80%9CX%20currently%20focuses%20on%20account,as%20ensuring%20use](https://techcrunch.com/2023/09/15/x-launches-account-verification-based-on-government-id/#:~:text=%E2%80%9CX%20currently%20focuses%20on%20account,as%20ensuring%20users%20have%20access.)
[rs%20have%20access.](https://techcrunch.com/2023/09/15/x-launches-account-verification-based-on-government-id/#:~:text=%E2%80%9CX%20currently%20focuses%20on%20account,as%20ensuring%20users%20have%20access.)

24 ⁸⁶ Episode 3: Making It Big, *Twitter: Breaking the Bird*, HBO (2025).

25 ⁸⁷ *Id.*

26 ⁸⁸ *Id.*

27 ⁸⁹ Episode 4: Disaster, *Twitter: Breaking the Bird*, HBO (2025).

28 ⁹⁰ Episode 3: Making It Big, *Twitter: Breaking the Bird*, HBO (2025).

1 addressing such reports.⁹¹ According to Anika Navaroli, counsel to Twitter’s Safety and Policy
 2 team as of 2018, CEO Dorsey prioritized personal discretion over established safety protocols, and
 3 Twitter’s leadership “bent and broke their own rules,” fostering a safety by whim environment that
 4 undermined child protection. This approach created a risk of delayed action on abuse and allowed
 5 for the continued exposure of children to harm due to the arbitrary enforcement of policies.⁹²

6 72. Twitter’s failure to systemically address abuse, harassment, and illegal content, all
 7 of which can be harmful to youth, persisted through the company’s remaining years as Twitter and
 8 has only intensified since its transition to new leadership.

9 73. In or about the spring of 2022, X Corp. assembled a team of 84 employees (the
 10 “Red Team”) to run tests related to the monetization of adult content posted to the platform. In
 11 April 2022, the Red Team itself concluded that X Corp. was not “accurately detect[ing] child
 12 sexual exploitation and non-consensual nudity at scale[.]” Additionally, the Red Team found that
 13 the company had not implemented the tools to verify that creators and consumers of adult content
 14 were of legal age. Thus, while X Corp. monetizes content related to child sexual exploitation, it
 15 is unwilling to put effective precautions in place to protect youth from harms associated with such
 16 content.

17 74. Media reports show that the company’s executives were alerted to issues with
 18 sexual exploitation and CSAM on its platform as early as the beginning of 2021, when an internal
 19 company report by the Health team noted: ““While the amount of [child sexual exploitation] online
 20 has grown exponentially, [X Corp.’s] investment in technologies to detect and manage the growth
 21 has not. . . .” Cyber-aggression is also prevalent on X Corp. because of its potential for anonymity

22
 23 ⁹¹ Episode 4: Disaster, *Twitter: Breaking the Bird*, HBO (2025). Twitter’s user growth stagnated
 24 following its IPO, but engagement sharply increased following the November 2016 U.S. elections.
 The increased engagement pushed to the forefront the issue of content moderation, which the
 company had so far failed to grapple with.

25 ⁹² Kurt Wagner, *Battle for the Bird: Jack Dorsey, Elon Musk, and the \$44 Billion Fight for*
 26 *Twitter’s Soul* (Simon & Schuster 2025); Episode 4: Disaster, *Twitter: Breaking the Bird*, HBO
 27 (2025); see also <https://thesignalsnetwork.org/whistleblower-to-congress-twitter-bent-and-broke-own-rules-before-jan-6/#:~:text=Whistleblower%20to%20Congress:%20Twitter%20'bent,attack%20on%20the%20U.S.%20Capitol>.
 28 S.%20Capitol.

1 and the ease with which so many people can join in. Victims of electronic aggression (including
 2 youth users) report an increase in suicidal thoughts and are more likely to attempt suicide.
 3 Describing similar large-scale or coordinated harassment campaigns on the platform, former
 4 Twitter Engineering Manager Miley recently explained, “If you get 100 people tweeting abuse at
 5 you, people would, like, become suicidal; with, like, 100 people doing it. So what happens when
 6 100,000 people do it?”⁹³ Youth are particularly vulnerable to cyber aggression on X Corp. because
 7 they are in critical stages of brain growth and development.

8 75. Harmful content continues to proliferate on the X Platform despite the company
 9 being warned of numerous failures to comply with its own policies, and parents and the public are
 10 not adequately warned of the dangers or provided with effective reporting mechanisms or parental
 11 controls.

12 76. In October 2021, an investigation conducted by 5Rights, a United Kingdom-based
 13 children’s digital-rights charity, found that “algorithmic recommendation systems were serving up
 14 harmful material or endangering the safety of children by connecting them with adult strangers.”⁹⁴
 15 Researchers noted: “When searching terms ‘#shtwt’ (self-harm tweet), ‘#ouchietwt,’ and
 16 ‘#sliceytweet’ we also found examples of [X platform] users telling others which razors they
 17 should use for self-harming and where to buy them, as well as users who shared extreme diet tips
 18 for achieving clinically underweight ‘goal’ weights.”⁹⁵ The researchers stated that such content
 19 “directly contravene[ed]” X Corp.’s own content policy. Additionally, the investigation
 20 highlighted a critical issue with X Corp.’s algorithmic recommendation system: “searching ‘self-
 21

22 ⁹³ Episode 3: Making It Big, *Twitter: Breaking the Bird*, HBO (2025). During the 2014-2015
 23 timeframe, and coinciding with negative user-driven events increasingly occurring on the platform,
 24 then-Twitter’s limited infrastructure and minimal investment in safety tools left users vulnerable
 to large-scale harassment campaigns.

25 ⁹⁴ Madhumita Murgia, *Dozens of leading apps accused of putting children in danger*, Vanguard
 26 Fin. Times (Oct. 8, 2021), <https://www.ft.com/content/bed30c91-03b2-4508-b708-8073b5ec8462?syn-25a6b1a6=1#:~:text=Data%2Ddriven%20harms,with%20adult%20strangers%2C%20for%20inst>
 27 [ance](https://www.ft.com/content/bed30c91-03b2-4508-b708-8073b5ec8462?syn-25a6b1a6=1#:~:text=Data%2Ddriven%20harms,with%20adult%20strangers%2C%20for%20inst).

28 ⁹⁵ *Id.*

harm’ through a child-aged avatar account on [the X Platform] showed profiles of [X Platform] users sharing images and, in some cases, videos of youth cutting themselves.”⁹⁶ X Corp. has failed to implement effective reporting structures and parental controls to prevent such activity from causing harm to youth. X Corp. has also failed to implement effective tools for youth/parent users to choose to avoid such problematic and harmful experiences.⁹⁷

77. In August 2022, the Network Contagion Research Institute (“NCRI”) released a separate investigative report, finding that in the months since announcing it would take “decisive and appropriate enforcement action,” the use of hashtags related to self-harm (*e.g.*, #shtwt) on the X Platform had increased “roughly 500%, averaging tens of thousands of mentions per month.”⁹⁸ Indeed, the report found that there was a “massive community” that glorified and encouraged self-harm, and in some instances, overlapping communities that “encourage[d] and glorif[ied]” eating disorders (with a particular fixation on shedding weight until the skeleton is visible), mass shootings, and more. *Id.* at 2.

78. The NCRI report noted that even a brief look at posts using coded hashtags like #shtwt revealed photos illustrating how severely people had cut into themselves, and that “[m]any also flag[ged] themselves as adolescents by posting their age and inviting peers their own age to interact with them on [the X Platform] around self-harm.” *Id.* at 4. Even if certain material is impermissible and inappropriate for children according to X Corp.’s terms of service, the NCRI report noted that the material is “in reality widely available,” and “is being consumed by children

⁹⁶ *Id.*

⁹⁷ In 2023, a study by the *International Journal of Eating Disorders* found that the X Platform continued to allow youth to be victimized by unknown adults, such as predators posing as weight loss coaches who target youth struggling with eating disorders, emotionally abuse them through implementing strict diets, and pressure them to send nude images through the guise of “body checks.” Devon Frye, “*I can help you lose weight, Sweetie*,” *Psych. Today* (Sep. 2, 2025), <https://www.psychologytoday.com/us/articles/202509/i-can-help-you-lose-weight-sweetie>. The study found that predators posing as weight loss coaches are operating on platforms run by Meta, TikTok, Snap, and Discord as well as the X Platform.

⁹⁸ Alex Goldenberg, et al., *Online Communities of Adolescents and Young Adults Celebrating, Glorifying, and Encouraging Self-Harm and Suicide are Growing Rapidly on Twitter*, NCRI (Aug. 2022), https://millercenter.rutgers.edu/wp-content/uploads/2022/09/NCRI-Twitter-Report_8.29.pdf.

1 with psychiatric disorders whose disordered thinking and dangerous behavior is exacerbated by
2 engaging with such content.” *Id.* at 11. Alarming, the NCRI report highlighted “a distinct
3 possibility that as a result of an algorithm, young people seeking help to stop harming themselves
4 could find themselves, instead, exposed to communities that encourage and celebrate their
5 compulsion to cut themselves.” *Id.* X Corp. has failed to implement effective parental controls to
6 prevent such activity from causing harm to youth. X Corp. has also failed to implement effective
7 tools for youth/parent users to choose to avoid such problematic and harmful experiences.

8 79. The NCRI report concluded: “If children who self-harm (whether by cutting or by
9 starving themselves) continue to find encouragement for increasing the severity of their injuries
10 on [the X Platform] rather than resources for getting help, [the X Platform] will be an ongoing,
11 potent accelerator for serious disorders. [X Corp.]’s inability to keep up with the evolution of
12 coded language allows social contagions of self-harm to escape detection, metastasize, and persist
13 on the platform. If [the X Platform] and other platforms prove unable to enforce their own policies
14 regarding suicide and self-harm, perhaps they should collectively create and fund an independent
15 nonprofit social media platform auditor to assist them in protecting children. [The X Platform] as
16 it is currently configured is not an appropriate platform for anyone under the age of 18.” *Id.* at 12.

17 80. In October 2022, approximately two months following the release of the NCRI
18 report, Musk acquired X Corp. for \$44 billion and became CEO of the company. Weeks later, X
19 Corp. dissolved its Trust and Safety Council, the advisory group of civil, human rights, and other
20 organizations the company formed in 2016 to address hate speech, child exploitation, suicide, self-
21 harm, and other problems on the X Platform.

22 81. X Corp. has failed to adequately warn of harm to youth on its platform and to design
23 features to reasonably protect youth from harm on the X Platform. X Corp. has not and does not
24 adequately warn parents and the public of the following risks to youth presented by its design
25 features:

- 26 • youth addiction and excessive use of the platform;
- 27
- 28

- the defective reporting structures to address the prevalence of child sexual exploitation, grooming, sextortion, and distribution of known CSAM on the platform;
- the harms associated with Chatbots, including X Corp.'s proprietary AI chatbot, Grok, which is built into the X Platform, is producing nonconsensual sexual images of real people – including young children – upon request of users. One estimate from late 2025 revealed that “Grok generated one nonconsensual sexual image every minute in a roughly 24-hour stretch.”⁹⁹
- ineffective age verification on the platform;
- ineffective reporting structures on the platform generally;
- ineffective tools for youth/parent users to choose to avoid problematic and harmful experiences on the platform. For instance, the X Platform does not provide an option to users to self-restrict time on the platform; and
- ineffective parental notifications and controls on the platform.

82. Despite being on notice that the X Platform is harmful to children and teens, X Corp. has failed to implement effective controls or modify its features to reasonably ensure safety for its youth users despite its affirmative promises to the contrary.

83. The X Platform generated \$3.4 billion in 2023, with advertising making up about \$2.5 billion, or 75% of total revenue.

E. Defendants Employ Artificial Intelligence in Ways that Expose Youth to Harmful Experiences

84. Defendants utilize AI and machine learning through the development and operation of features, including the release of original content, that are inherently dangerous and harmful to youth. These features serve to facilitate compulsive use, overuse, and addiction by youth users, as well as expose youth to harmful experiences due to the lack of meaningful protections for youth users.

85. Defendants' use of AI and machine learning falls into at least three categories: the use of AI to promote addictive use; AI machine learning to conduct content moderation; and the

⁹⁹ Matteo Wong, *Elon Musk's Pornography Machine*, The Atlantic (Jan. 2, 2026), <https://www.theatlantic.com/technology/2026/01/elon-musks-pornography-machine/685482/>.

1 development and publication of AI-generated original content, including, but not limited to,
2 through large language models such as chatbots.

3 86. The U.S. Surgeon General's Advisory, Surgeon General's Warning on the Harms
4 of Screen Use reports that nearly 50% of adolescents admit they lose track of the amount of time
5 they spend on their phone. Greater screen use has been associated with higher depression,
6 behavioral problems, self-injury, substance use, and lower self-perception, particularly with high
7 levels of social media use.¹⁰⁰

8 87. Defendants, including Google, YouTube, Meta, Facebook, Snap, Discord, TikTok,
9 and X Corp., intentionally design and operate their platforms to maximize users' screen time
10 through the use of features intended to exploit human psychology using complex algorithms driven
11 by advanced AI and machine-learning systems. For example, YouTube has developed and
12 operates machine learning technology with the goal of increasing the amount of time users spend
13 watching content on YouTube. The AI-driven suggestions succeed in maximizing user
14 engagement. YouTube Chief Product Officer Neal Mohan stated in 2018 that YouTube's AI-
15 driven recommendations are responsible for 70% of the time users spend on YouTube.¹⁰¹ In other
16 words, 70% of all YouTube content that users watch was recommended to users by YouTube's
17 machine learning technology, as opposed to users purposely searching for and identifying the
18 content they watch. Defendants have failed to implement effective parental controls to prevent
19 such activity from causing harm to youth. Defendants have failed to implement effective tools for
20 youth/parent users to choose to avoid such problematic and harmful experiences.

21 88. Meta also uses AI to keep users engaged. Rather than display information
22 chronologically, posts are displayed based on a user's previous online activity, including whether
23

24
25 ¹⁰⁰ Office of the Surgeon General, *U.S. Surgeon General's Advisory: Surgeon General's Warning*
26 *on the Harms of Screen Use* (2026). [https://www.hhs.gov/sites/default/files/us-surgeon-generals-](https://www.hhs.gov/sites/default/files/us-surgeon-generals-advisory-warning-on-the-harms-of-screen-use.pdf)
[advisory-warning-on-the-harms-of-screen-use.pdf](https://www.hhs.gov/sites/default/files/us-surgeon-generals-advisory-warning-on-the-harms-of-screen-use.pdf).

27 ¹⁰¹ Joan E. Solsman, *YouTube's AI is the puppet master over most of what you watch*, CNET
28 (Jan. 20, 2018), [https://www.cnet.com/tech/services-and-software/youtube-ces-2018-neal-](https://www.cnet.com/tech/services-and-software/youtube-ces-2018-neal-mohan/)
[mohan/](https://www.cnet.com/tech/services-and-software/youtube-ces-2018-neal-mohan/).

the user previously “share[d],” “like[d],” or otherwise engaged with similar content.¹⁰² In March 2024, Meta unveiled that it will begin using a new artificial model across all its Social Media Platforms that promises to be even more effective at prolonging the time that users spend online.¹⁰³ Tom Alison, head of Facebook, said that the new model kept users watching its video “Reels” for 8%-10% longer, proving that the model was “learning from the data much more efficiently than the previous generation.” Defendants have failed to implement effective parental controls to prevent such activity from causing harm to youth. Defendants have failed to implement effective tools for youth/parent users to choose to avoid such problematic and harmful experiences.

89. Second, Defendants rely on AI-driven technology to moderate content on their platforms, which fail to detect and block inappropriate and harmful content accessed by youth. This leads to harms, including, but not limited to, youth users getting exposed to CSAM; getting targeted by adult predators; and finding content that promotes self-harm, such as how to engage in cutting and hide it from adults. Defendants have failed to implement effective parental controls to prevent such activity from causing harm to youth. Defendants have failed to implement effective tools for youth/parent users to choose to avoid such problematic and harmful experiences.

90. Third, Defendants have developed and are operating chatbots that engage with users, including youth users, with original content composed by the applications themselves. For instance, Meta recently unveiled an AI chatbot with 28 personas, among them the “ride-or-die older sister” resembling Kendall Jenner, aimed at engaging younger users.¹⁰⁴ In 2023, Snap added to its feed “My AI,” an AI chatbot that engages with users, including children, with on-demand text produced by the application itself. Snapchat developed this “virtual friend” to further increase engagement. It has features that make its chatbot more “friendly,” such as the option to customize

¹⁰² Nick Clegg, *How AI Influences What You See on Facebook and Instagram* (June 29, 2023), <https://about.fb.com/news/2023/06/how-ai-ranks-content-on-facebook-and-instagram/>.

¹⁰³ Jonathan Vanian, *Meta is building a giant AI model to power its ‘entire video ecosystem,’ exec says*, CNBC (Mar. 6, 2024), <https://www.cnbc.com/2024/03/06/facebook-working-on-single-ai-model-to-power-all-video-recommendations.html>.

¹⁰⁴ Wes Davis, *Meta’s AI chatbot plan includes a ‘sassy robot’ for younger users*, Verge (Sep. 24, 2023), <https://www.theverge.com/2023/9/24/23887773/meta-ai-chatbots-gen-ai-personas-young>.

1 the chatbot's name, design a custom bitmoji avatar for it, and include it in group chats with
 2 friends.¹⁰⁵ It is not possible to remove the chatbot from a user's feed unless that user pays to
 3 subscribe to Snap's premium subscription service.

4 91. In tests that have been recreated multiple times, Snap's My AI responds to self-
 5 identified youth users with inappropriate and misleading content, including how to hide the smells
 6 of alcohol and marijuana, "setting the mood" for a minor having sex with a 30-year-old for the
 7 first time, and writing essays for self-identified students when asked to do so for a school project.¹⁰⁶
 8 It even explains to teens how to hide the Snap application from parental monitoring.¹⁰⁷ In user
 9 tests, the My AI becomes more problematic the longer one chats with it.¹⁰⁸

10 92. Snap's My AI is also problematic in providing mental health advice to youth users
 11 because it can reinforce confirmation bias, allowing users to continue to feel badly if they approach
 12 the chatbot in a negative mood.¹⁰⁹ According to Alexandra Hamlet, a clinical psychologist in New
 13 York City: "If a teen is in a negative mood and does not have the awareness desire to feel better,
 14 they may seek out a conversation with a chatbot that they know will make them feel worse. . . .
 15
 16
 17
 18

19 ¹⁰⁵ Samantha Murphy Kelly, *Snapchat's new AI chatbot is already raising alarms among teens*
 20 *and parents*, CNN Bus. (Apr. 27, 2023), <https://www.cnn.com/2023/04/27/tech/snapchat-my-ai-concerns-wellness/index.html>.

21 ¹⁰⁶ Geoffrey A. Fowler, *Snapchat tried to make a safe AI. It chats with me about booze and sex*,
 22 *Wash. Post* (Mar. 14, 2023), <https://www.washingtonpost.com/technology/2023/03/14/snapchat-myai/>; *see also* Common Sense Media, *AI Initiative, My AI* (Oct. 19, 2023),
<https://www.common sense media.org/ai-ratings/my-ai>.

23 ¹⁰⁷ *Id.*

24 ¹⁰⁸ *Id.*

25 ¹⁰⁹ Sarah Perez, *Several popular AI products flagged as unsafe for Kids by Common Sense Media*,
 26 *Tech Crunch* (Nov. 16, 2023), <https://techcrunch.com/2023/11/16/several-popular-ai-products-flagged-as-unsafe-for-kids-by-common-sense-media/#:~:text=An%20independent%20review%20of%20popular%20AI%20tools%20has,Stable%20Diffusion%2C%20may%20not%20be%20safe%20for%20kids.>

Over time, having interactions like these can erode a teens’ sense of worth, despite their knowing that they are really talking to a bot.”¹¹⁰

93. Defendants’ large language models, such as Snap’s My AI, put youth users at an unreasonable risk of harm and expose youth users to harmful experiences and inappropriate and dangerous content created by Defendants themselves. Defendants are aware that their AI language models are “experimental” and yet continue to expose youth to harm through the original content they produce.¹¹¹ Defendants have failed to implement effective parental controls to prevent such activity from causing harm to youth. Defendants have failed to implement effective tools for youth/parent users to choose to avoid such problematic and harmful experiences.

II. ADDITIONAL CAUSES OF ACTION

COUNT II

Violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. §201, *et seq.* (Against All Defendants)

94. Plaintiff incorporates by reference each and every allegation in the original Complaint in Bucks County and Commonwealth of Pennsylvania, acting by and through Bucks County District Attorney Matthew D. Weintraub v. TikTok Inc., No. 4:23-cv-01149-YGR (ECF 1).

95. Plaintiff Commonwealth of Pennsylvania incorporates by reference its Complaint for Violations of (1) Pennsylvania Public Nuisance Law; and (2) Pennsylvania Unfair Trade Practices and Consumer Protection Law, MDL No. 4:22-md-3047-YGR (“Complaint”), as though set forth fully herein.

96. Plaintiff Commonwealth of Pennsylvania brings this claim under Pennsylvania’s Unfair Trade Practices and Consumer Protection Law (“UTPCPL”) as to all Defendants.

¹¹⁰ Samantha Murphy Kelly, *Snapchat’s new AI chatbot is already raising alarms among teens and parents*, *supra* note 105.

¹¹¹ Geoffrey A. Fowler, *supra* note 106.

97. Under the UTPCPL, an act or a practice is violating if the defendant is engaged in unfair methods of competition and unfair or deceptive acts or practices. Defendants engaged in unfair methods of competition by: (a) designing, marketing, promoting, and operating their platforms in a manner intended to deluge youth with the most polarizing, titillating, controversial, emotionally charged, and otherwise salacious material created by third parties and by Defendants themselves; and (b) using IVRs or dopamine hits to intentionally alter youth users' behavior, creating habits and addiction so as to maximize the time youth spend on their respective platforms, despite knowledge of the harms to youth from their wrongful conduct. Moreover, Defendants overlooked and concealed known harms their products have on young users.

98. Defendants not only design and structure their platforms to appeal to youth users (*see, e.g.*, ¶¶137-144, 180-186, 255-268)¹¹² but also exploit youth neurophysiology to keep children scrolling longer (*see generally* Complaint). These strategies include inducing a “flow state,” manipulating social comparisons and triggering dopamine “hits.” *See, e.g.*, ¶¶45, 71, 104, 113-120, 150, 163, 213, 217. The algorithms are neither neutral nor benign but rather amplify the most polarizing, titillating, controversial, emotionally charged, and otherwise salacious material created by third parties and by Defendants themselves. Distortions and divisiveness are not only tolerated but embraced.¹¹³ *See, e.g.*, ¶¶59-74, 160-162. The content promoted, often unhealthy or outright harmful for our children and teens, is deliberately engineered to exploit the frailties of their developing brains and maximize their engagement. Despite warnings by Facebook's own researchers that delivering users more and more divisive content is dangerous, Defendants continued their harmful practices.¹¹⁴

¹¹² All “¶” references herein refer to the Complaint, defined above.

¹¹³ Max Fisher, *The Chaos Machine: The Inside Story of How Social Media Rewired Our Minds and Our World*, at 22-23 (2022).

¹¹⁴ Jeff Horwitz & Deepa Seetharaman, *Facebook Executives Shut Down Efforts to Make the Site Less Divisive*, Wall St. J. (May 26, 2020), <https://www.wsj.com/articles/facebook-knows-it-encourages-division-top-executives-nixed-solutions-11590507499>.

1 99. Moreover, Defendants have expressly spoken falsely in the public domain about
 2 the positive effects of their platforms on youth users. For example in 2021, former YouTube CEO
 3 Susan Wojcicki stated that Google’s video platform, YouTube, is beneficial to adolescents’ mental
 4 health; Snap CEO Evan Spiegel similarly stated that Snapchat makes 95% of its users (most of
 5 whom are youth) “feel happy”; Facebook sought first to conceal and then to downplay and
 6 diminish its own study, which found that Instagram use harmed the well-being of teenage girls;
 7 and TikTok, too, has denied subjecting users to harmful experiences. In so doing, Defendants have
 8 engaged in unfair and/or deceptive business practices that directly or indirectly harmed
 9 Pennsylvania consumers within the meaning of 73 P.S. §201-4(v) and (xxi).

10 100. The exemptions under 73 P.S. §201-3 do not apply to Defendants. First, Plaintiff
 11 is not alleging Defendants are liable for what third parties have said on Defendants’ platforms but
 12 rather for Defendants’ own conduct. Second, Plaintiff’s claims arise from Defendants’ status as
 13 designers and marketers of dangerous social media platforms that have injured the health, comfort,
 14 and repose of its community. The nature of Defendants’ platforms centers around Defendants’
 15 use of algorithms and other design features that encourage users to spend the maximum amount of
 16 time on their platforms – not on particular third-party content. Third, Defendants are liable for the
 17 content they create. Fourth, Plaintiff does not seek to hold Defendants liable as publishers or
 18 speakers of information provided by other content providers.

19 101. Plaintiff’s claim rests on Defendants’ affirmative conduct, which has resulted in the
 20 current public health crisis among youth mental health.

21 102. Defendants’ conduct violated the UTPCPL by:

22 (a) designing, marketing, promoting, and/or operating their platforms in a
 23 manner intended to maximize the time youth spend on their respective platforms, despite
 24 knowledge of the harms to youth from their wrongful conduct;

25 (b) manipulating users to keep using or coming back to their platforms through
 26 the use of IVRs;

27 (c) intentionally marketing their platforms to children and teens, directly
 28 facilitating the widespread, excessive, and habitual use of their platforms among youth; and

1 (d) knowingly designing and modifying their platforms in ways that promote
2 excessive and problematic use in ways known to be harmful to children.

3 103. The aforementioned methods, acts, or practices constitute unfair or deceptive acts
4 or practices within the meaning of §201-2(4) of the UTPCPL, including, but not limited to:

5 (a) “[c]ausing likelihood of confusion or of misunderstanding as to the source,
6 sponsorship, approval or certification of goods or services,” in violation of 73 P.S. §201-2(4)(ii);

7 (b) “[r]epresenting that goods or services have sponsorship, approval,
8 characteristics, ingredients, uses, benefits or quantities that they do not have or that a person has a
9 sponsorship, approval, status affiliation, or connection that he does not have,” in violation of 73
10 P.S. §201-2(4)(v);

11 (c) “[r]epresenting that goods or services are of a particular standard, quality or
12 grade, or that goods are of a particular style or model, if they are of another,” in violation of 73
13 P.S. §201-2(4)(vii); and

14 (d) “[e]ngaging in any other fraudulent or deceptive conduct which creates a
15 likelihood of confusion or of misunderstanding” in violation of 73 P.S. §201-2(4)(xxi).

16 104. The above described conduct has been willful within the meaning of 73 P.S. §201
17 8 and is unlawful under the UTPCPL.

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