

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JOHN DOE,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No.: 3:25-cv-02175
)	
ROBLOX CORPORATION,)	
)	
Defendant.)	JURY TRIAL DEMANDED

COMPLAINT AGAINST ROBLOX CORPORATION

Plaintiff, John Doe (“Plaintiff”), by and through his undersigned counsel, for his Complaint against Defendant Roblox Corporation (“Roblox” or “Defendant”), pleading hypothetically and in the alternative, states as follows:

I. INTRODUCTION

1. This is a uniquely egregious case of public importance involving a multibillion dollar company, Roblox, which created, designed, marketed, and distributed a mobile and web-based gaming platform and application (the “app” or “game”) that it misleadingly held out to the public, parents, and its users as a safe platform for children. In reality, Roblox was (and still is) a haven for adult sexual predators and pedophiles who use the unreasonably dangerous and negligently designed app to gain access to and prey upon thousands of unsuspecting children, resulting in countless children being groomed, exploited, sexually abused, and even kidnapped and raped. Plaintiff is one of Roblox’s many victims.

2. When Plaintiff was around 11 years old, he was introduced to an adult predator on Roblox, and unbeknownst to his parents, groomed, extorted, and sexually abused by a man in his late thirties, causing lifelong harm, shame, and a profound loss of trust, safety, and innocence.

Plaintiff brings this lawsuit against Defendant Roblox for the devastating damages caused by Defendant's tortious and punitive conduct in designing, managing, and promoting the app, which facilitated the grooming and sexual abuse of Plaintiff (and countless other children).

3. Through its pervasive misrepresentations about safety, Defendant lures parents into believing that its app is an appropriate place for children to play. In reality, and as Defendant well knows, the unreasonably dangerous and defective design of its app makes children easy prey for pedophiles. It allows adult users to identify and readily initiate conversations, and exchange Roblox's self-developed digital currency called "Robux" with children. These defective and unreasonably dangerous design features allow adult users to easily locate, groom, and extort children. These pedophiles coerce the children, often in exchange for Robux, into sending sexually explicit images or meeting in person. There are reasonable alternative designs and features which Roblox could implement into the app to protect children and make the app safer. But time and again they have refused to implement basic safety features to protect against exactly the kind of exploitation Plaintiff suffered here.

4. The reason for Defendant's unlawful and tortious conduct is simple: Defendant prioritizes growing the number of users of its app over child safety. As one former Roblox employee explained in describing the company's approach to child safety, **"You have to make a decision, right? You can keep your players safe, but then it would be less of them on the platform. Or you just let them do what they want to do. And then the numbers all look good and investors will be happy."**¹ Defendant's prioritization of growth over the safety of children has devastated the lives of children who use its app.

5. Plaintiff is a married former member of the United States Marine Corps with

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

children. In around 2007, when Plaintiff was around 11 years old, he moved to a new school in Ellis County, Texas and did not have any friends, so he became an avid player of Roblox. As a young boy, Plaintiff loved Legos and building games, and Roblox appealed to him. Plaintiff especially enjoyed playing tycoon-style games, which involve growing or managing imaginary, digital businesses. When Plaintiff was removed by the administrator from a tycoon game, another player, who turned out to be Plaintiff's eventual abuser, reached out and offered to get him back into the game if Plaintiff sent him a photograph of his bare buttocks. The perpetrator indicated he was a minor. Plaintiff sent the photograph.

6. What followed was a course of predictable, predatory, and illegal grooming by the adult perpetrator, whom Plaintiff should never have been introduced to at such a young, impressionable age while playing Roblox -- a game specifically designed for children and touted for its safety and educational features. The perpetrator began grooming Plaintiff, coaxing him with Robux so that Plaintiff could make in-game purchases for his digital character.

7. Over the course of several months, this course of grooming and abuse escalated into "sextortion." Sextortion, a combination of the words sex and extortion, is a term used to describe a form of online sexual exploitation.

8. The Federal Bureau of Investigation (FBI) and its law enforcement partners have recognized sextortion as a significant global crisis, particularly impacting minors. This crime involves coercing individuals, often through deception and threats, into sending sexually explicit images or videos online, which are then used for blackmail, either for further explicit content or financial gain. These schemes disproportionately target minor boys, are known to lead to severe emotional distress, self-harm, and even suicide.

9. Here, the perpetrator began to threaten Plaintiff that he would publicly disclose the

explicit photographs of him if Plaintiff did not “pay him off.” The perpetrator eventually coerced Plaintiff to meet him in person.

10. Plaintiff traveled to the perpetrator’s home, and when he arrived, he learned for the first time that the individual he had been chatting with was not a minor child like he was, but an adult man in his 30’s. There was pornography playing on the television, and the perpetrator removed his clothing and then coerced Plaintiff to remove his. Plaintiff was subjected to horrific sexual abuse and molestation by the adult perpetrator / predator, until he was eventually able to escape.

11. Plaintiff has suffered lasting harm from being introduced, groomed, extorted, exploited and eventually sexually abused through Roblox. The abuse severely affected Plaintiff’s self-image throughout his life and caused him incredible shame and trauma. He never played Roblox again. Plaintiff’s innocence was snatched from him forever. Tragically, what happened to Plaintiff is far from an isolated event. Indeed, Plaintiff is just one of countless children whose lives have been devastated because of Defendant’s misrepresentations and defectively designed app. This action, therefore, is not just a battle to vindicate Plaintiff’s rights—it is a stand against Defendant’s systemic failures to protect society’s most vulnerable from unthinkable harm in pursuit of financial gain over child safety.

II. PARTIES

A. Plaintiff

12. Plaintiff is a citizen of the State of Texas, with a principal place of residence in Ellis County. Plaintiff was born in 1996.

13. As a direct and proximate cause of Defendant’s wrongful and tortious conduct, and the resulting sexual, physical and psychological abuse, Plaintiff has suffered and continues to

suffer serious injuries and damages, including but not limited to physical trauma and pain, mental suffering, emotional distress, psychological trauma, severe anxiety, depression, and other irreparable harm. Plaintiff has also endured humiliation, shame, fear, and a profound loss of trust, safety, and innocence. These injuries are severe, permanent, and continuing, leaving Plaintiff with lifelong consequences and ongoing emotional and psychological suffering. Plaintiff has sustained and will continue to sustain economic damages as well, including but not limited to past and future medical expenses, lost education, and loss of income and/or lost earning capacity.

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

B. Defendant

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

III. JURISDICTION

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

17. This Court has personal jurisdiction over Defendant because Defendant regularly

conducts business in this State, provides its app to persons in this State, and derives substantial revenue from the same; Defendant affirmatively and extensively engages with a significant percentage of this State's residents through messages, notifications, and other communications; and Plaintiff's causes of action arise from Defendant's forum-related contacts

18. Venue is proper here under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claims occurred in this District and Division.

IV. FACTUAL ALLEGATIONS AGAINST ROBLOX

A. Roblox Offers a Gaming App For Children

19. Launched in 2004, Roblox is an online gaming app that allows users to play myriad games, which the company refers to as "experiences." There are currently more than 40 million experiences within the Roblox ecosystem. While Roblox initially developed its own game experiences, today experiences on Roblox are created by companies and others who develop their own games and make them available on Roblox for others to play.

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

21. Roblox is designed to be an interactive experience supported by Roblox's uniquely designed, proprietary tools and features. Gameplay interactions, user hubs, direct messaging, and voice chat all promote interactions between users. Roblox's co-founder and CEO David Baszucki has explained that his vision is for Roblox to bring about "the next phase of human interaction," which he also has described as "a new category of human co-experience."² Roblox has similarly explained that it "operates a human co-experience platform . . . where users interact with each

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

other to explore and develop immersive, user generated, 3D experiences.”³

22. Roblox specifically designed its app for children. At all relevant times, on Roblox’s website, under the Frequently Asked Questions (FAQs) page, the first FAQ question was: “What is ROBLOX?” to which Defendant answered: “ROBLOX is an online virtual playground and workshop — **where kids of all ages can safely interact, create, have fun, and learn.**”

23. At all relevant times, on its website under the FAQ “Who is ROBLOX for?” Defendant answered: “**ROBLOX is designed for 8-18 year olds, but it is open to kids of all ages.**”

24. Roblox has marketed its app not only as the “#1 gaming site for kids and teens”⁴ but also as an educational experience for young users.

25. Roblox claims that it provides “new gateways into learning”—from “chemistry to physics to robotics and more, Roblox experiences bring concepts to life in ways that immerse learners and motivate exploration, play, and deep thinking.”⁵ These offerings, according to Roblox, include “high-quality, standards-aligned, immersive educational experiences designed by curriculum experts.”⁶

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

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

⁵ Roblox, *A New Era of Engaged Learning*, <https://corp.roblox.com/education> (last visited Jul. 15, 2025).

⁶ *Id.*



Roblox webpage – “A New Era of Engaged Learning.”

26. In another example of how Roblox promotes the alleged educational value of its app to parents, it specifically asks the question on its website on the FAQ page:

How is ROBLOX educational?

We believe in the theory that kids learn best by making things — by engaging in the creative and complex process of imagining, designing, and constructing. Provide them with a safe place to build, give them the requisite tools, and let them play.

We're particularly inspired by the educational theory pioneered by Seymour Papert of the MIT Media Lab. This theory — labeled "Constructionism" — holds not only that kids learn best when they are in the active roles of designer and builder, but that their learning is optimized when they're assuming these roles in a public forum.

This makes good sense to us — particularly after observing some of our members who know that the fruits of their labor may be seen, critiqued, and used by others. These are motivated kids who become deeply engaged with building complex structures and solving difficult problems. Their level of creativity, the amount of time and care spent building, and the extent and high quality of their discourse never fails to astonish us.

27. Roblox further highlights its alleged educational value under the FAQ “Why did we create ROBLOX?” where it answered: “There are many online sites for kids. However, most of these sites are focused primarily on helping kids socialize and play games. We wanted to build

something more — a place that not only satisfies kids’ social and entertainment needs but that also satisfies kids’ hunger for creativity and learning.”

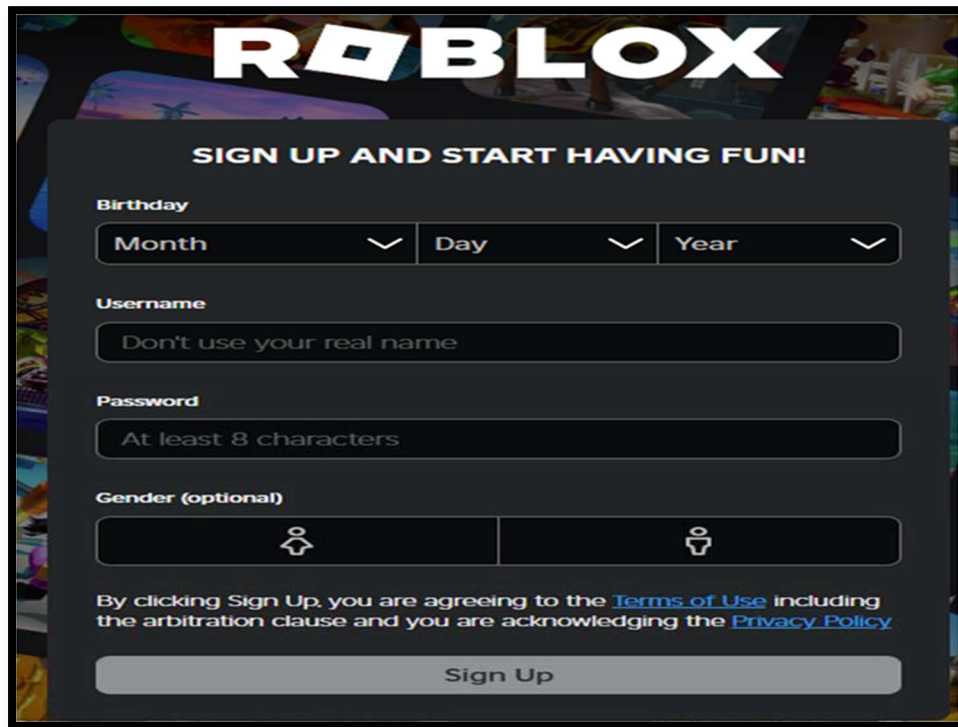
28. Roblox’s popularity among children exploded during the pandemic when the app was flooded with millions of new users as kids were confined to their homes and glued to their devices. By September 2020, roughly 30 million people, more than half of them under 13, were on Roblox daily, making it the world’s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

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

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

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

⁷ Qustodio, *Research by App Category – Gaming*, <https://www.qustodio.com/en/the-digital-dilemma/gaming/> (last visited Jul. 15, 2025).

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

Roblox Sign-up screen.

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

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



Example of default avatar on Roblox.

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



Examples of games available on Roblox.

35. Until November 2024, Roblox configured its app to default to settings that allowed adults to easily communicate with children. Accordingly, because Plaintiff first downloaded and began playing Roblox around 2007, his account would have been defaulted by Roblox to permit communications with adult users. Indeed, when Plaintiff downloaded and played Roblox for the

first time, Defendant had no safety features whatsoever with respect to child-adult interactions. Adult strangers (or predators) could “friend” and chat with a child of any age via direct (i.e., private) message. Further, even without being “friends,” adults (or predators) could also chat with a child of any age within a Roblox experience through direct messages.

36. Now, under Roblox’s default settings, adults cannot directly message children under 13, but Roblox still does nothing to prevent children this young from creating accounts with fake 13+ birthdates, which gives them full access to Roblox’s direct-messaging options. Notwithstanding the availability of reasonable age-verification tools, and despite all the documented instances of children being sexually exploited on the app (as described further below), Roblox still relies on self-reported birthdates for age verification. Further, children 13 and over are still vulnerable to receiving friend requests—or direct messages within Roblox experiences—from adult strangers. There is also nothing that prohibits adults from entering fake birthdays and posing as children in their attempts to friend or otherwise communicate with child users.

37. Roblox generates revenue largely by selling users its unique, internally developed in-game digital currency called Robux, which users exchange for digital content such as online experiences and customized outfits and appearances for their avatars. Robux can be purchased in a single transaction, or a user may subscribe to receive Robux on a recurring basis with a Roblox Premium membership. Roblox also offers Robux gift cards that anyone can purchase and send to any user. From 2007 until 2016, Defendant also offered a unique internally developed in-game digital currency called Tickets, or Tix for short, which could be earned by players through various methods, including how frequently the users played the game, and which could be used to buy items for user avatars or exchanged for Robux.

38. Children frequently become obsessed with purchasing or otherwise obtaining

Robux to buy items for their avatars and to spend in their favorite experiences on Roblox. In Roblox's Avatar Store, for example, the company sells rare items at astronomical prices, such as a type of hair for an avatar, which children seek to purchase to keep up with or outdo peers on Roblox. As a result of this, children often tell others, including strangers, that they will do "Anything for Robux."⁸ Even back when Plaintiff first started playing Roblox in around 2007, he understood that a major objective of the game was to acquire Robux and Tix to purchase items for his avatar.

B. Roblox Lures Parents into Letting their Kids Use Roblox With Promises of Safety

39. Roblox's success and continued growth has hinged on its constant assurances to parents that its app is not only educational but also safe for children. The company has stressed to parents and the public the safety of its app throughout its history and in every forum possible—on its website, through public promises from its highest executives, in news articles, on podcasts, and on and on. These representations are knowingly and recklessly false and misleading.

40. Over the years, Roblox has repeatedly represented on its website that its app is safe for children and has touted the safety controls it has in place.

41. In 2006, Roblox highlighted on its website's Main Page that its policies "are designed to make ROBLOX a safe place for people of all ages, including very young children." In 2006, Roblox's website also told parents and user that it had "ROBLOX staff" that was actively monitoring the app to ensure its safety, and who were providing "warnings" to users who violated various safety policies. Repeated warnings would be grounds to be banned by the app's staff. Actions that would result in a warning included but were not limited to swearing / "the use of bad language during in game chat or on forum"; threatening or intimidating another player; spamming;

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

and asking for another ROBLOX user's password. Roblox indicated it immediately destroyed user accounts that violated certain policies which it referred to as "severe violations." Severe violations included predatory behavior, offensive account names, swearing or offensive language in account profiles, and accessing another user's account. In regards to "Predatory Behavior," Roblox stated "Any actions of a predatory nature will result in the immediate destruction of a user account and a report will be filed with the authorities" by its staff. Parents were led to believe "ROBLOX staff" were actively monitoring the app and ensuring it was safe for children.

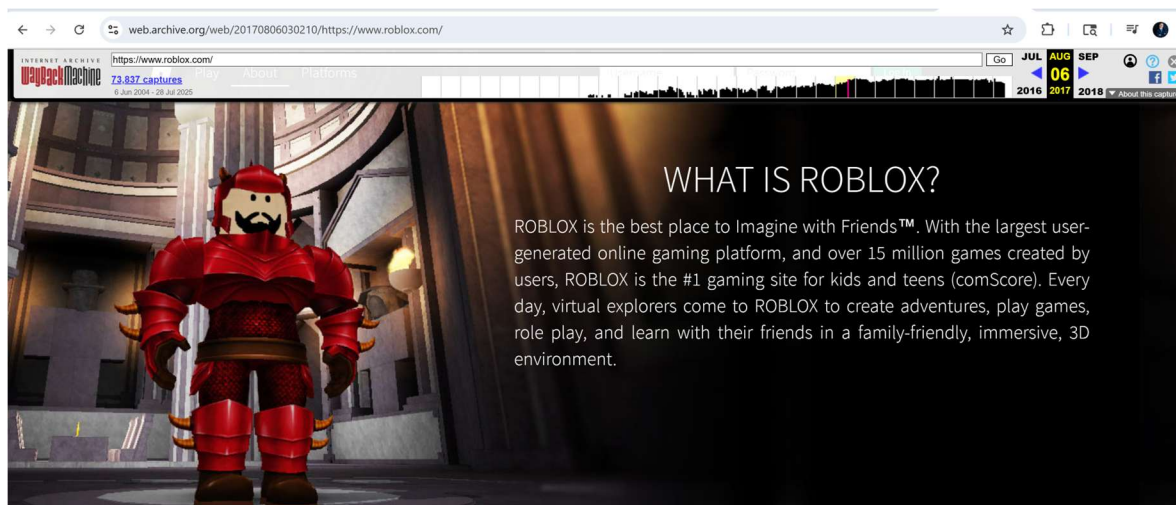
42. In 2007, and thereafter, through its website and advertising, Roblox continued to assure parents that Roblox was an "online virtual playground ... where kids of all ages can safely interact, create, have fun, and learn."⁹

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

44. Since its founding and at all relevant times until present, Roblox's website has consistently sought to paint Roblox as "family friendly" and safe for children of all ages.

45. For example, on its website in 2017, Roblox described its platform as follows:

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



Roblox Website (2017 screenshot)

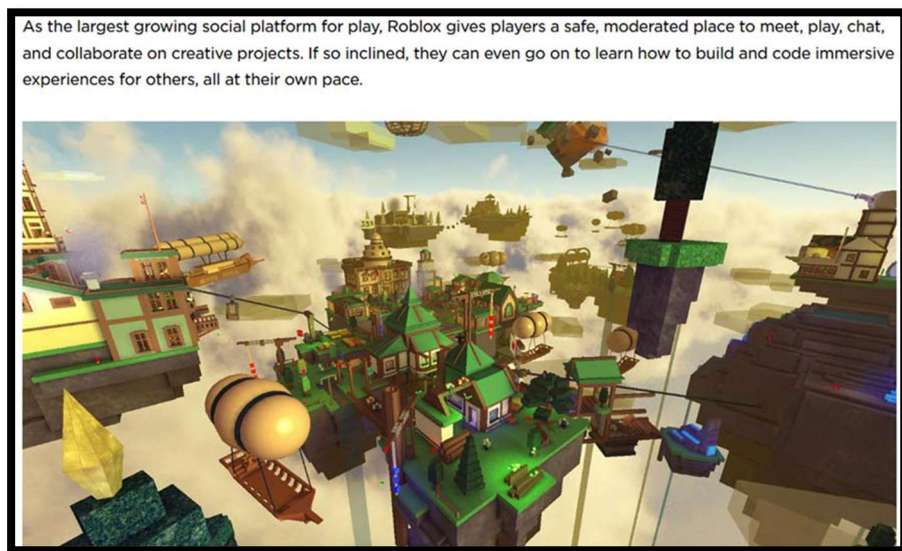
46. In 2017, Roblox began declaring that it “take[s] kids’ safety and privacy very seriously” and “strive[s] to continually develop new and innovative technologies that will protect the safety of our community while allowing players to imagine, create, and play together in a family-friendly environment.”¹⁰ As early as 2017, on its website under the FAQ “What does Roblox do to protect my kids’ safety and privacy?” Roblox re-assured parents by answering:

We take kids’ safety and privacy very seriously. Roblox is part of a distinguished group of companies that are on the board of the Family Online Safety Institute (FOSI), a non-profit organization that’s dedicated to ensuring the safety of children on the Internet. We strive to continually develop new and innovative technologies that will protect the safety of our community while allowing players to imagine, create, and play together in a family-friendly environment . . .

We protect our players’ safety by proactively filtering inappropriate content and acting against anyone who is in violation of our Rules of Conduct. All uploaded images, video, and audio files are pre-reviewed by moderators for appropriate content before being allowed on the site. Our moderation team is also online around the clock reviewing abuse reports.

¹⁰ Roblox, *Parents’ Guide*, <https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/> (archived Jul. 16, 2017).

47. Roblox similarly has advertised its app as “a safe, moderated place to meet, play, chat, and collaborate on creative projects.”¹¹



Excerpt From Roblox's Parent Guide in 2017

48. Roblox's website representations have remained largely the same since then. In 2023, for example, Roblox assured parents that it “continually develop[s] cutting-edge technologies to ensure that the Roblox platform remains a safe and fun space for players all over the world.”¹² Roblox claimed that the company was “dedicated to working together with parents and digital safety experts to promote a family-friendly environment that allows all players to imagine, create, and play online.”¹³ Roblox emphasized that it is “committed to ensuring that Roblox is a safe and fun place for everyone.”¹⁴ According to Roblox, it “goes above and beyond to foster an environment where people of any age can create, play, learn, and imagine safely. We’ve

¹¹ *Id.*

¹² Roblox, *For Parents*, <https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/> (archived Apr. 5, 2023).

¹³ *Id.*

¹⁴ Roblox, *Roblox FAQ*, <https://web.archive.org/web/20230328011957/https://corporate.roblox.com/faq/> (archived Mar. 28, 2023).

kept children’s privacy and safety top-of-mind when designing our platform, especially through the implementation of advanced text filters that block inappropriate language or other unsafe content.”¹⁵

49. Roblox’s website today contains similar assurances. It claims, “Safety is in our DNA: when Dave Baszucki and Erik Cassel launched Roblox in 2006, they spent a few hours each day with the community, helping to ensure that Roblox was a safe and welcoming environment. Safety was their top priority, and they made constant improvements in their moderation, both for content and for communication on the platform.”¹⁶

50. According to the current website, Roblox “won’t allow language that is used to harass, discriminate, incite violence, threaten others, or used in a sexual context.”¹⁷ It touts a “stringent safety system and policies,”¹⁸ which includes its “expertly trained team with thousands of members dedicated to protecting our users and monitoring for inappropriate content”; its “safety review of every uploaded image, audio, and video file, using a combination of review by a large team of human moderators and machine detection before they become available on our platform”; and its chat filters for inappropriate content, which “are even stricter” for children under 13 and “include any potentially identifiable personal information, slang, etc.”¹⁹

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

¹⁶ Roblox, *Safety Comes First on Roblox*, <https://corp.roblox.com/safety-civility-resources?section=news&article=safety-comes-first-on-roblox> (last visited Jul. 15, 2025).

¹⁷ Roblox, *Safety Features: Chat, Privacy & Filtering*, <https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%20that%20a%20younger%20players> (last visited Jul. 11, 2025).

¹⁸ Roblox, *Safety & Civility at Roblox*, <https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox> (last visited Jul. 15, 2025).

¹⁹ *Id.*

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

52. As early as 2009, a blogger wrote about blocking Roblox because he doubted its safety for his children. Roblox CEO David Baszucki responded to the blogger reassuring him that Roblox flags "obviously offensive content" and removes it, and if "something is marginal, but gets flagged as inappropriate," Roblox "investigate[s] immediately."²⁰

53. In a 2013 Wired interview, when asked whether a parent should be concerned about whom his child was chatting with in-game, Roblox CEO Baszucki declared, "We take every precaution possible to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content," taking a sentence verbatim from Roblox's webpage for parents.²¹

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

Parents

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

²⁰ Eric Frenchman, *Revisiting Roblox*, Pardon My French (Oct. 5, 2009), <https://pardonmyfrench.typepad.com/pardonmyfrench/2009/10/revisiting-roblox.html>.

²¹ Tony Sims, *Interview with David Baszucki, Founder & CEO of Roblox*, Wired (Feb. 7, 2013), <https://www.wired.com/2013/02/roblox/>.

55. As recently as 2024, Roblox Vice President Bhaumik told Parents Magazine that “[w]e have a responsibility to make sure our players can learn, create, and play safely. This continues to be our most important priority and that will never change.”²²

56. Such statements by Roblox Vice President Bhaumik date back years. In 2018, Bhaumik told the Washington Post that Roblox “focus[es] on making sure that everything is done in a safe and appropriate way.”²³ That year, she also claimed to another newspaper that Roblox’s “safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate.”²⁴ She also boasted that Roblox has “created extensive parental controls for our games and a detailed Roblox Parent’s Guide that provides information to parents to help create a Roblox experience that’s best for their child.”²⁵

57. In 2019, while presenting on a “Digital Civility Panel,” Roblox Vice President Bhaumik emphasized that “[w]e make sure there’s a safe environment,” citing Roblox’s “tremendous reporting system” and “incredible moderation and CS team that reacts very, very quickly.”²⁶ On that same panel—and in contradiction to Roblox’s representation that it had always taken “every precaution possible” to protect children, Bhaumik conceded that “digital civility did not exist at Roblox a year and a half ago and we established this and made it a movement within

²² Maressa Brown, *Is Roblox Safe for Kids? Here’s What the Experts Have to Say*, Parents Magazine (Apr. 29, 2024), <https://www.parents.com/kids/safety/internet/is-roblox-safe-for-kids/>.

²³ Hayley Tsukayama, *Roblox, an Online Kids Game, Explains How a Hack Allowed a Character’s Virtual ‘Rape’*, Wash. Post. (Jul. 17, 2018), <https://www.washingtonpost.com/technology/2018/07/17/roblox-an-online-kids-game-explains-how-hack-allowed-characters-virtual-rape/>.

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

²⁵ *Id.*

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

our company.”²⁷ She added later, “It’s still very early days for us. This whole digital civility focus for Roblox is still there, we’re just still establishing it.”²⁸

58. In a 2022 video interview about safety on Roblox, Roblox Vice President Bhaumik asserted that Roblox’s “number one priority” is “to create a safe, civil, and inclusive community” and that “[s]afety and civility has always been baked into everything that we do.”²⁹ That year, on a podcast, she also bragged about Roblox’s purported safety protections, including “thousands of human moderators on the front lines” and “machine learning that is constantly taking a look at chat filters.”³⁰ With these and other measures, she exclaimed, “[a]ny sort of bad actor that comes onto the platform is dealt with swiftly” and “[w]e remove any content that’s reported to us within minutes.”³¹

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

60. In a 2024 blog post on Roblox’s website, Roblox Chief Safety Officer Kaufman asserted that “Roblox has spent almost two decades working to make the platform one of the safest online environments for our users, particularly the youngest users. Our guiding vision is to create the safest and most civil community in the world.”³² According to Kaufman, “For users under 13, our filters block sharing of personal information and attempts to take conversations off Roblox,

²⁷ *Id.*

²⁸ *Id.*

²⁹ Video Interview with Tami Bhaumik, Roblox’s VP of Digital Civility & Partnerships (2022), <https://www.facebook.com/bedford.sheriff/videos/roblox-how-to-help-kids-use-itsafelyroblox-vp-of-digital-civility-partnerships/1338989609901259/>.

³⁰ YouTube, Into the Metaverse, Podcast: EP.21: Tami Bhaumik (Roblox) - Building a Safe & Resilient Metaverse, https://www.youtube.com/watch?v=LT5_bBOYS9A.

³¹ *Id.*

³² Matt Kaufman, Chief Safety Officer, *Driving Civility and Safety for All Users*, Roblox (July 22, 2024), <https://corp.roblox.com/newsroom/2024/07/driving-civility-and-safety-for-allusers>.

where safety standards and moderation are less stringent.”³³ A few months later, he added, “Safety is and always has been foundational to everything we do at Roblox.”³⁴

61. In a later blog post, Roblox Chief Safety Officer Kaufman touted Roblox’s “track record of putting the safety of the youngest and most vulnerable people on our platform first.”³⁵

62. Roblox Chief Safety Officer Kaufman also recently told NPR that “any time anything happens to a child that puts them at risk is one too many.”³⁶

C. In Reality, Roblox is a Digital and Real-Life Nightmare for Children

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

64. This campaign of reassurance masks the truth about Roblox. Far from creating a safe place for children, Roblox designed, built, sells and maintains a toxic product that has enabled obscene material to flourish and, worse, enables predatory pedophiles to hunt, groom, and sexually exploit and abuse children. What Roblox represents as a safe, appropriate space for children is, in fact, a digital and real-life nightmare for kids (and their parents).

1. Roblox Hosts and Promotes Graphic, Sexually Explicit Content

65. Roblox designs and sells a product offering an endless array of not just online

³³ *Id.*

³⁴ Matt Kaufman, Chief Safety Officer, *Major Updates to Our Safety Systems and Parental Controls*, Roblox (Nov. 18, 2024), <https://corp.roblox.com/newsroom/2024/11/major-updates-to-our-safety-systems-and-parental-controls>.

³⁵ Matt Kaufman, Chief Safety Officer, *Scaling Safety and Civility on Roblox*, Roblox (Apr. 4, 2024), <https://corp.roblox.com/newsroom/2024/04/scaling-safety-civility-roblox>.

³⁶ Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety Features, Past Cases of Child Abuse on the Platform*, WBUR (Nov. 18, 2024), <https://www.wbur.com/hereandnow/2024/11/18/roblox-safety-features>.

games but also immersive virtual worlds where children's customized avatars can engage in activities like playing house, adopting pets, and mimicking adult behaviors—including sexually explicit ones.

66. These games and virtual worlds are brought to life through developer tools that Roblox designs, controls, and makes available to third parties. These tools, which include scripting capabilities, 3D modeling systems, and other proprietary, self-developed and designed software supply the technical infrastructure for the Roblox platform. As a designer, Roblox has the power to control or limit the use and capabilities of these tools. Instead, Roblox offers them to the public without reasonable technical limitations, meaningful oversight, or reasonable safeguards. The results are predictably deplorable.

67. Shockingly (considering that the app was specifically designed for and heavily marketed to children), Roblox's scripting language -- which allows developers to manipulate avatar activity and interactions any way they want -- creates scenarios where avatars engage in accurately simulated sexual activity.³⁷ This is as true today as it was when Plaintiff first played the game around 2007.

68. This simulated sexual activity pervades Roblox. There have been numerous reports of children's avatars being raped by other users' avatars. For example, in 2018, a seven-year-old girl's avatar was violently raped by two male avatars on a playground in a Roblox experience, which was witnessed by the girl's mother.³⁸ In describing the aftermath of this traumatic

³⁷ See, e.g., YouTube, *How to Do Roblox Sex Glitch*, https://www.youtube.com/watch?v=Zz97Q1SQE_k; see also YouTube, *Roblox Sex?*, <https://www.youtube.com/watch?v=hyqCHG6nUYI>.

³⁸ Savannah Levins, *North Carolina Mom Outraged After Roblox Game Depicts Violent Acts, Including Rape*, WFMYNews2 (June 30, 2018), <https://www.wfmynews2.com/article/news/local/2-wants-to-know/north-carolina-mom-outraged-after-roblox-game-depicts-violent-acts-including-rape/83-569498171>.

experience, the girl's mother explained, "I never in my wildest dreams would've ever imagined that I would have to talk with my seven-year-old about rape."³⁹

69. Roblox also hosts a staggering number of experiences specifically centered on simulated sexual activity. For instance, children can play in "condo games"—predatory digital environments, including houses, where users can remove their avatars' virtual clothing, revealing nudity, and engage in disturbing simulated sexual activities with other Roblox users.⁴⁰ "Condo games" and "scented games" are notorious for sexual content and permit users to simulate various sexual activities with nude avatars. Condo games and scented games thrive on Roblox's system, which triggers Roblox's algorithm to include them in user recommendations and search suggestions. Users can also play games like "Public Bathroom Simulator Vibe," which allows access to children as young as nine years old and enables users to simulate sexual activity in virtual bathrooms,⁴¹ as well as virtual strip clubs, where child avatars perform sexually explicit acts, like giving lap dances to patrons.

³⁹ *Id.*

⁴⁰ EJ Dickson, *Inside the Underground Strip-Club Scene on Kid-Friendly Gaming Site Roblox*, Rolling Stone (Sep. 12, 2021), <https://www.rollingstone.com/culture/culture-features/roblox-virtual-strip-clubs-condo-games-sex-1197237/>.

⁴¹ *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, Hindenburg Research (Oct. 8, 2024), <https://hindenburesearch.com/roblox/>.

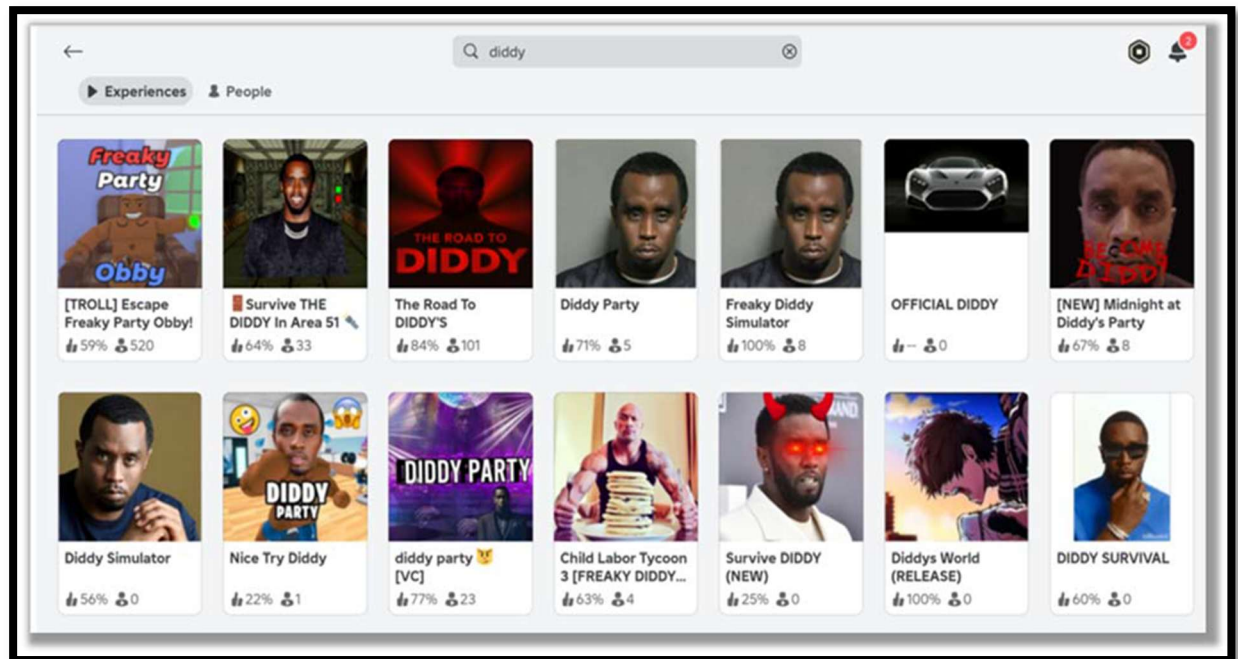


(Source: Roblox "Public Bathroom Simulator / Game")

*Roblox's Public Bathroom Simulator Game is rated ages nine and up and allows users to simulate sexual activity.*⁴²

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

⁴² Hindenburg Research, *supra* note 1.



Examples of Roblox games modeled after Diddy's sex trafficking ventures⁴³.

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

⁴³ *Id.*



*Example of Roblox game modeled after Jeffrey Epstein's sex trafficking ventures.*⁴⁴

72. The unreasonable manner in which Roblox designed and sells its app plays a direct role in enabling these rampant, sexually exploitative experiences. Roblox is fully aware that these experiences pervade its app, and yet it allows them to continue to exist unchecked despite the ability to control or eliminate them. Leaked internal Roblox documents reveal that in designing the app, Roblox examined this type of content and made decisions such as “[h]ow big of a ‘bulge’” was acceptable, and, with the introduction of layered clothing for avatars (i.e., allowing avatars to wear multiple layers of clothing), whether players could be nude.⁴⁵ By facilitating the creation of this content through its scripting capabilities, 3D software, and other proprietary, self-developed and designed technology embedded in the app, Roblox materially contributed to the proliferation of games simulating sexual activity, such as condo games, scented games, and virtual strip clubs, which inevitably attracted the sexual predators who are pervasive on the app.

73. The effects of these games on children can be devastating. Playing video games

⁴⁴ *Id.*

⁴⁵ Joseph Cox & Emanuel Malberg, Leaked Documents Reveal How Roblox Handles Grooming and Mass Shooting Simulators, *Vice* (Aug. 1, 2022), <https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/>.

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

74. Studies support this connection. One study found that playing games with sexualized content was linked to increased rates of sexual harassment toward female targets, suggesting that such exposure desensitizes players to the real-world consequences of these actions.⁴⁶ Another study showed that playing mature-rated games was associated with higher rates of risky sexual behavior years later, highlighting the long-term impact of exposure to sexualized or exploitative content.⁴⁷

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

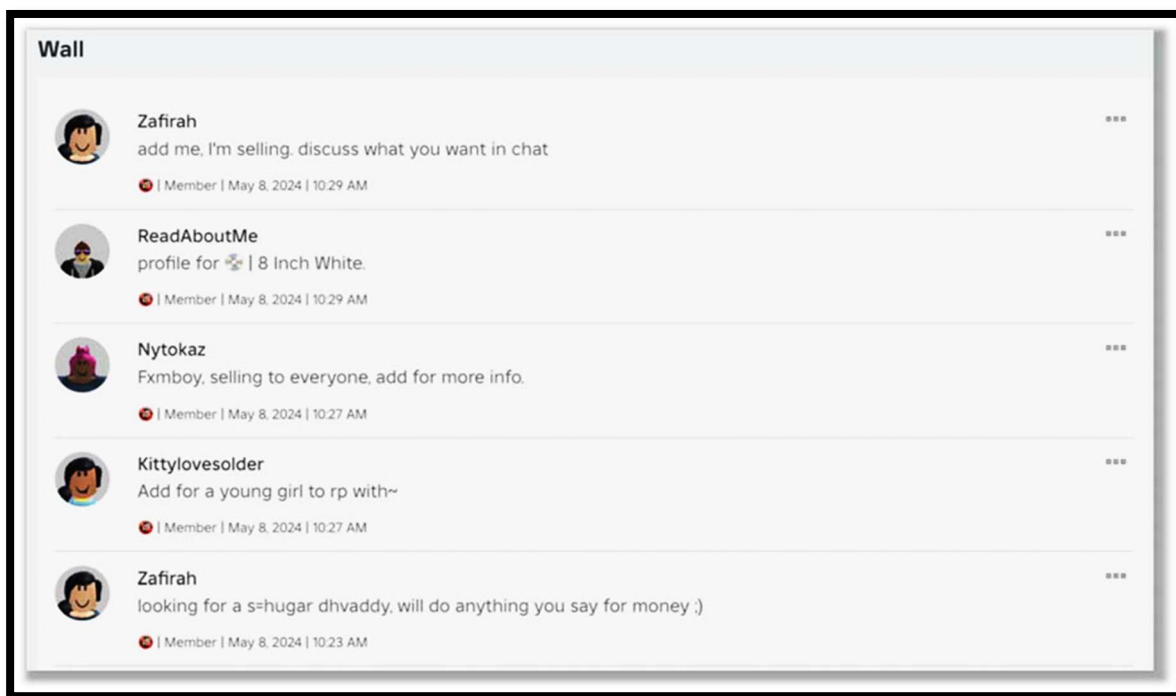
76. The dangerous content on Roblox is not limited to online games. The recent investigative report discussed above found that a basic search for “adult” in Roblox revealed a group with 3,334 members “openly trading child pornography and soliciting sexual acts from minors.”⁴⁸ And tracking these members unearthed additional Roblox groups engaged in the same

⁴⁶ Jonathan Burnay, Brad J. Bushman & Frank Larøi, *Effects of Sexualized Video Games on Online Sexual Harassment*, 45 *Aggressive Behavior* 2, 214 (March/April 2019).

⁴⁷ Jay G. Hull et al., *A Longitudinal Study of Risk-Glorifying Video Games and Behavior Deviance*, J. Pers. Soc. Psychol. 2014 August; 107(2): 300–325. doi:10.1037/a0036058.

⁴⁸ Hindenburg Research, *supra* note 1.

criminal conduct, including one massive group with 103,000 members.⁴⁹ Yet Roblox failed to find and shut down these groups; nor did Roblox implement any technically feasible and effective age restrictions on these criminal groups, deliberately leaving them accessible to all users.⁵⁰



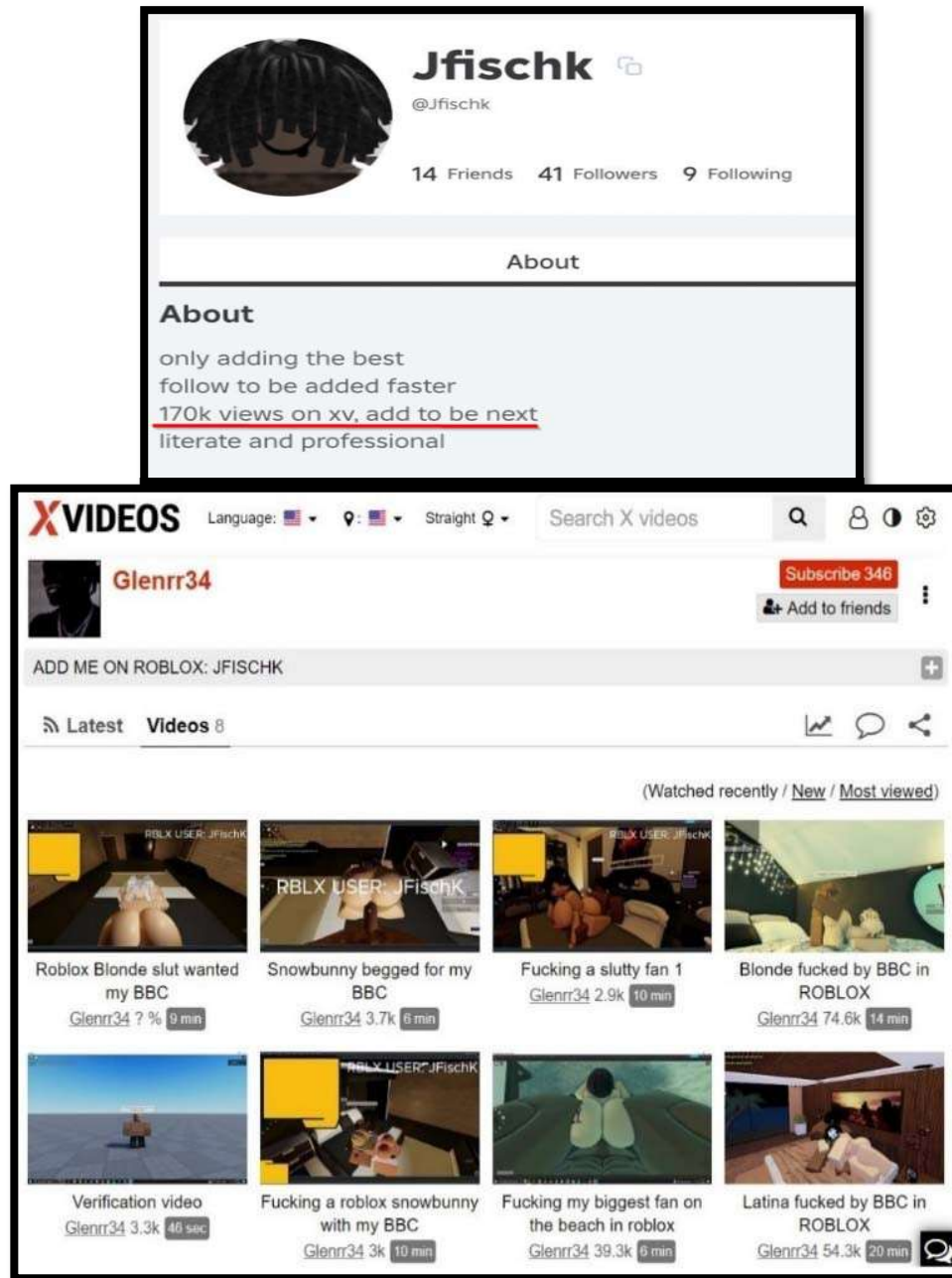
Public chat wall for a group named “Adult Studios,” where users openly solicited child pornography.⁵¹

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

⁴⁹ *Id.*

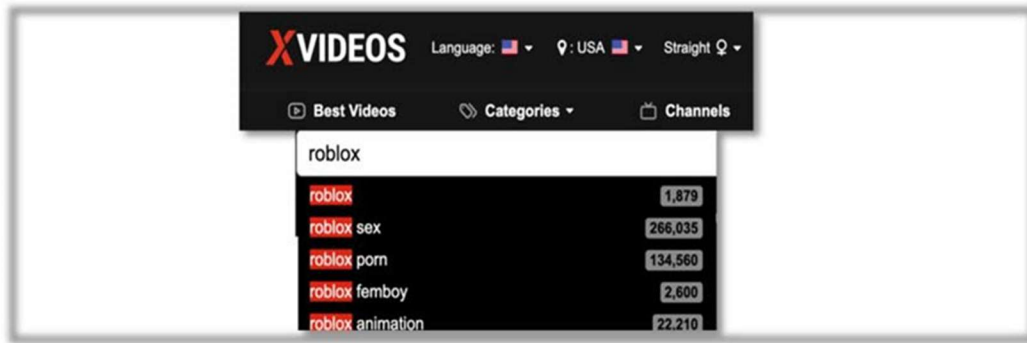
⁵⁰ *Id.*

⁵¹ *Id.*

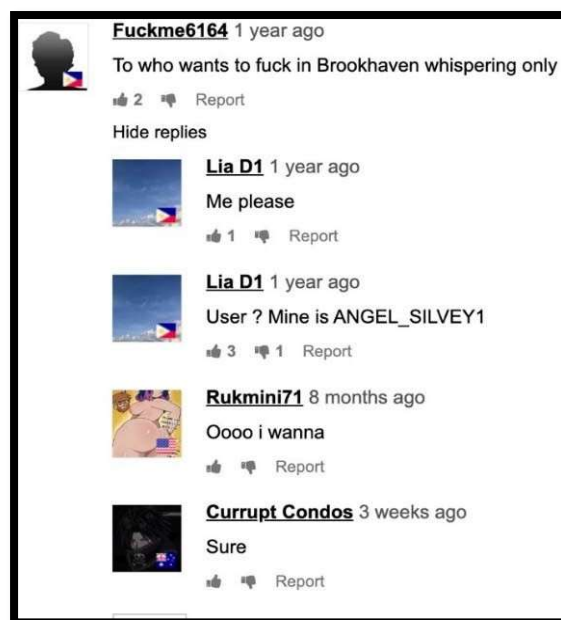


This Roblox user advertised their Roblox account on porn website, XVideos, where they had uploaded videos of their avatar having sex with other Roblox users.⁵²

⁵² *Id.*



Searching “Roblox” on XVideos, a porn website, yields more than 250,000 results.⁵³



The comment section on a Roblox porn video on XVideos – Brookhaven is one of Roblox’s most popular games and is available to users of all ages.⁵⁴

78. In sum, Roblox completely contradicts its representations of providing a safe product specifically designed for kids and demonstrates a blatant disregard for the safety of its minor users, revealing the company’s prioritization of user engagement over its fundamental duty to protect young users.

⁵³ *Id.*

⁵⁴ *Id.*

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

79. For years, predators seeking to find, groom, abuse, and exploit children have seized upon Roblox’s unreasonably defective and dangerous design when it comes to safeguarding users. Roblox provides predators with easy access to tens of millions of children and allows these predators to freely move between inappropriate content and popular games to identify and target vulnerable young users. By doing so, Roblox has demonstrated reckless indifference to its fundamental obligation not to sell a product that places children at significant risk of sexual exploitation.

80. These systematic patterns of exploitation on Roblox follow a predictable and preventable sequence that the company has known about and facilitated for years: a predator misrepresents their age to other users on the app, impersonating as a fellow child, methodically befriends the vulnerable young victim, and then strategically manipulates the child to send explicit photographs or content or move the conversation onto other, less-guarded, platforms such as Discord or Snapchat.

81. As the recent Bloomberg Businessweek article titled *Roblox’s Pedophile Problem* put it, “These predators weren’t just lurking outside the world’s largest virtual playground. They were hanging from the jungle gym, using Roblox to lure kids into sending photographs or developing relationships with them that moved to other online platforms and, eventually, offline.”⁵⁵

82. The Roblox app, in effect, serves as an initial access point to children for predators. **Media reports have repeatedly highlighted that Roblox “is being used as a first point of**

⁵⁵ Carville & D’Anastasio, *supra* note 8.

contact for predators.”⁵⁶ The children, due to their underdeveloped brains, are more trusting and naïve, and often fail to recognize the danger of providing their usernames on other sites.

83. Predators escalate their exploitation by soliciting explicit material, like nude photos or videos of children doing sexually inappropriate acts, all of which constitute child pornography. And while the ultimate solicitation of explicit photos or other criminal acts may occur on other platforms, the Roblox app serves as the critical facilitator that enables these predators to first identify, target, and gain the trust of young victims through its app’s unreasonable and dangerous design and inadequate safety measures.

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

85. Despite full awareness of how its app facilitates such exploitation, Roblox continues to profit from these tactics by collecting transaction fees on Robux exchanges. Roblox’s financial entanglement with sexualized content sold or extorted through its self-created currency Robux renders it much more than a mere host of content, but a material contributor to exposing young children to sexually exploitative content and predatory adults. Its reckless indifference to the consequences of its deliberately engineered app mechanics highlights its prioritization of profit over the safety and well-being of its young users.

86. Regardless of how the initial grooming relationship begins, which is often as simple

⁵⁶ National Center on Sexual Exploitation, *The Dirty Dozen List '24: Roblox*, <https://endsexualexploitation.org/roblox/> (last updated Dec. 4, 2024).

as someone asking the child to be their boyfriend or girlfriend, the predators also often attempt to make in-person contact with the child, as was the case with Plaintiff, who initially believed he was speaking with a minor when it was in fact a dangerous predator in his 30's. The dangerous progression from Roblox's online app to real-world violence reveals the devastating consequences of the company's product. Roblox's app enables predators to escalate from virtual contact to orchestrating physical meetings, leading to harassment, kidnapping, trafficking, violence, and sexual assault of minors, all conduct of which these children suffered as a direct result of Roblox's actions.

87. Through numerous well-documented and publicized cases, Roblox has long been aware of the systemic exploitation that its app enables and facilitates. **For years, countless children have been sexually exploited and abused by predators they met on Roblox.** Further, the incidents described below occurred after Roblox sought to implement features to guard against adult-child interactions, while Plaintiff, who was around 11 years old in 2007, was left **completely vulnerable and exposed to adult child predators** in the virtual hunting ground Roblox

88. For example, in 2017, Roblox's app enabled a predator to target an eight-year-old child and solicit explicit photos, prompting one mother to observe that Roblox had created "the perfect place for pedophiles."⁵⁷

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

⁵⁷ Pei-Sze Cheng, Evan Stulberger & Dave Manney, *I-Team: Popular Online Gaming Site for Kids is Breeding Ground for Child Sex Predators, Mother Says*, NBC New York (Apr. 6, 2017), <https://www.nbcnewyork.com/news/local/video-game-warning-roblox-child-sex-predator-online-site-investigation-what-to-know/87438/>.

violent threats, including of death, against her family.⁵⁸ That year, 24 men in New Jersey were also charged with soliciting sex from minors as part of a sting operation, where the New Jersey State Police Lieutenant specifically called out Roblox as a place where “individuals are posing as someone else” in order “to gain someone’s trust.”⁵⁹

90. In 2019, a Florida predator systematically used Roblox to target children ages 10-12, moving them to Discord to coerce the children into sending him naked pictures of themselves.⁶⁰ That year, a man in Wales encouraged 150 children to engage in sexual activity by contacting them through Roblox, where he pretended to be a child and used fake names.⁶¹

91. In May 2019, a mother reported to law enforcement, Roblox and the media that an online predator groomed her minor son through Roblox into sending explicit photos, and that the man was sending her son messages about rape and other sexual, pornographic activities.⁶²

92. During the pandemic, reports of child sex abuse facilitated by Roblox skyrocketed. In 2020, for example, Roblox enabled a 47-year-old predator to pose as a teenager, target a 16-year-old girl, move the conversation to Facebook, solicit explicit photos and videos, all of which

⁵⁸ Briana Barker, *Internet Safety and Your Children: How Kids are at Risk*, Record-Courier (Mar. 27, 2018), <https://www.record-courier.com/story/news/2018/03/27/internet-safety-your-children-how/12899346007/>.

⁵⁹ *Cop, Firefighter Among 25 Charged in Child Luring Sting*, FOX 13 TAMPA BAY (Sep. 25, 2018), <https://www.fox13news.com/news/cop-firefighter-among-24-charged-in-child-luring-sting>.

⁶⁰ Max Chesnes, *Deputies Say Vero Beach Man Used Popular Video Game Platforms to Target Children*, TC Palm (Aug. 20, 2019), <https://www.tcpalm.com/story/news/crime/indian-river-county/2019/08/20/detectives-advise-online-safety-after-vero-beach-man-used-video-game-platforms-target-minors/2059599001/>.

⁶¹ Liz Day, *Paedophile Groomed 150 Children to Engage in Sexual Activity Using Online Game Roblox*, Wales Online (May 10, 2019), <https://www.walesonline.co.uk/news/wales-news/paedophile-groomed-150-children-engage-16258877>.

⁶² Rachel Stonehouse, *Roblox: ‘I thought he was playing an innocent game,’* BBC (May 29, 2019), available at: <https://www.bbc.com/news/technology-48450604>.

constituted child pornography,⁶³ and ultimately traffic her across state lines, raping her multiple times.⁶⁴ In Michigan, a man was arrested for persuading an eight-year-old girl to send him videos of herself, in various stages of undress, in exchange for Robux.⁶⁵ The perpetrator had been arrested for similar offenses three years earlier and was a registered sex offender in Kansas. This perpetrator was not the only convicted sex offender who was able to freely create accounts on Roblox: in 2021, a convicted sex offender used Roblox to sexually solicit a 12-year-old child.⁶⁶ And in 2022, a 33-year-old man groomed a 13-year-old girl on Roblox, transported her from her home in Kansas to his home in Georgia, and raped her multiple times.⁶⁷

93. 2023 was more of the same. For example, a 30-year-old man was arrested for soliciting illicit photos from young victims and authorities reported that he had three separate Roblox accounts.⁶⁸ A 27-year-old man was arrested for kidnapping an 11-year-old girl whom he met on Roblox.⁶⁹ A 23-year-old New Jersey man, who was a prominent Roblox developer with a known history of exploiting children via Roblox, was sentenced to 15 years in prison for grooming a 15-year-old girl, transporting her to his house, and sexually abusing her.⁷⁰

⁶³ U.S. Dep't of Justice, *Magnolia Man Gets Life For Exploiting Young Female He Met and Communicated With Via Roblox and Facebook* (Oct. 15, 2020), <https://www.justice.gov/usao-sdtx/pr/magnolia-man-gets-life-exploiting-young-female-he-met-and-communicated-roblox-and>.

⁶⁴ *United States v. McGavitt*, 28 F.4th 571, 578 (5th Cir. 2022).

⁶⁵ *Man Arrested for Inappropriate Relationship with 8-Year-Old Bloomfield Twp. Girl Through Roblox*, WXYZ Detroit (Sep. 24, 2020), <https://www.wxyz.com/news/man-arrested-for-inappropriate-relationship-with-8-year-old-bloomfield-twp-girl-through-roblox>.

⁶⁶ Jeff Bonty, *Man Charged With Soliciting Juvenile Through Roblox*, Daily Journal (Jul. 23, 2021), <https://www.shawlocal.com/daily-journal/>.

⁶⁷ Fox 5Atlanta Digital Team, *Clayton County Man Charged with Sex Trafficking, Rape of 13-year-old Girl He Met on Gaming App Roblox*, Fox5 (Mar. 2, 2022), <https://www.fox5atlanta.com/news/clayton-county-man-charged-with-sex-trafficking-rape-of-kansas-girl>.

⁶⁸ City of Fontana Police Department, *Internet Predator Arrested*, Facebook (Dec. 20, 2023), <https://www.facebook.com/watch/?v=338311109095057>.

⁶⁹ *Man Charged in Kidnapping of 11-year-old He Met Through Roblox from Her NJ Home: Police*, ABC7 (Oct. 21, 2023), <https://abc7ny.com/roblox-kidnapping-new-jersey-online-grooming/13927383/>.

⁷⁰ U.S. Dep't of Justice, *New Jersey Man Sentenced to 15 Years in Federal Prison After Grooming Minor Online and Transporting Her Across State Lines Via Uber for Sex* (Aug. 30, 2023),

94. Similar incidents continued throughout 2024. For example, a 21-year-old Chilean man was arrested for traveling to the U.S. to meet an underage girl he met on Roblox, where he had “spent several months manipulating and grooming” her.⁷¹ A 21-year-old in California pled guilty for directing a 10-year-old girl, whom he met on Roblox, to disrobe and touch herself.⁷² A 64-year-old man admitted to posing as a 13-year-old boy on Roblox, where he met a 12-year-old girl and convinced her to send sexually explicit photos of herself and a young relative.⁷³ A 29 year-old Michigan befriended and groomed an 11-year-old girl on Roblox by posing as a teenager and then coerced the girl into sending multiple explicit photos of herself.⁷⁴ And a 24-year-old man raped a 10-year-old girl he had met on Roblox.

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

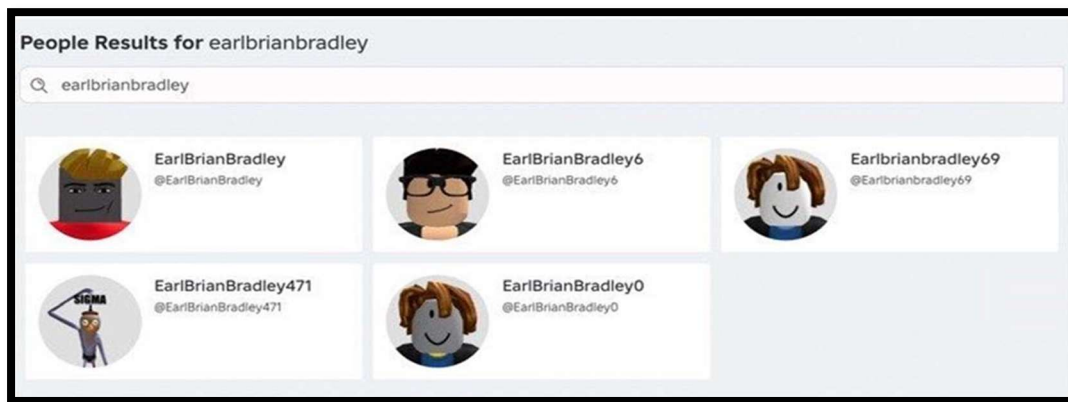
<https://www.justice.gov/usao-sdin/pr/new-jersey-man-sentenced-15-years-federal-prison-after-grooming-minor-online-and>.

⁷¹ Grace Toohey, Chilean Man Groomed 13-Year-Old Girl He Met on Roblox Before Flying to U.S. to Meet Her, Police Say, L.A. Times (Aug. 22, 2024), <https://www.latimes.com/california/story/2024-08-22/chilean-arrest-roblox-child-exploitation>.

⁷² Ashley Harting, Online Predator Who Targeted 10-Year-Old on Roblox Pleads Guilty in Butte County, KRCR (Sep. 25, 2024), <https://krctrv.com/news/local/online-predator-who-targeted-10-year-old-on-roblox-pleads-guilty-in-butte-county>.

⁷³ Travis Schlepp, Man, 64, Admits to ‘Catfishing’ Girl on Roblox, Convincing Her to Send Explicit Images, KTLA 5 (Jul. 26, 2024), <https://ktla.com/news/california/man-64-admits-to-catfishing-girl-on-roblox-convincing-her-to-send-explicit-images/>.

⁷⁴ Michael Martin, Roblox Predator: School Staffer Accused of Grooming West Michigan Child for Illicit Photos, Fox17 West Michigan (Jan. 16, 2025), <https://www.fox17online.com/news/local-news/roblox-predator-school-staffer-accused-of-grooming-west-michigan-child-for-illicit-photos>.



Results from an account search for “earlbrianbradley.”⁷⁵

96. Roblox’s systematic endangerment of children has been publicly condemned by leading advocacy organizations. The National Center on Sexual Exploitation (“NCSE”) has consistently named Roblox to its “Dirty Dozen” list—an annual campaign exposing companies that facilitate, enable, or profit from sexual exploitation. The NCSE blasts Roblox for “treat[ing] child protection like a game.”⁷⁶ **According to the NCSE, “[u]ntil basic child protection standards are met, Roblox remains too high risk for kids.”⁷⁷**

97. Parent reviews of Roblox on sites like Common Sense Media also document disturbing incidents of naked avatars, sexting, simulated sexual assault, and adult predators.⁷⁸

98. The magnitude of the harm caused by Roblox is devastating. Yet rather than warn parents and implement reasonable alternative designs, as many of its competitors and other companies who sell games to children have already done, Roblox minimizes these dangers through repeated misleading public statements. Roblox’s Chief Safety Officer, Matt Kaufman, attempting to deflect attention from serious safety failures, told NPR, “I think we’re losing sight of the tens

⁷⁵ Hindenburg Research, *supra* note 1.

⁷⁶ National Center on Sexual Exploitation, *supra* note 59.

⁷⁷ *Id.*

⁷⁸ Common Sense Media, *Parent Reviews of Roblox*, <https://www.commonsensemedia.org/website-reviews/roblox/user-reviews/adult> (last visited Jul. 15, 2025).

of millions of people where Roblox is an incredibly enriching part of their life.”⁷⁹ And while Kaufman publicly claims that “any time anything happens to a child that puts them at risk is one too many,”⁸⁰ Roblox simultaneously admitted to investors that it was “unable to prevent all such [inappropriate] interactions from taking place.”⁸¹ This calculated contradiction between public messaging and private admissions—telling parents that even one incident is unacceptable while simultaneously acknowledging to investors that abuse is inevitable—exposes Roblox’s strategy of prioritizing public relations through hollow and misleading public statements over its fundamental duty to protect children.

D. Roblox Knowingly Causes and Materially Contributes to the Sexual Exploitation of Children

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

1. Roblox prioritizes growth over child safety

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

101. Roblox’s business model allowed the company to attract significant venture capital

⁷⁹ Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety Features, Past Cases of Child Abuse on the Platform*, WBUR (Nov. 18, 2024), <https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features>.

⁸⁰ *Id.*

⁸¹ Roblox Corp., S-1 (Securities Registration Statement) 24 (Nov. 19, 2020).

funding from big-name investors like Kleiner Perkins and Andreessen Horowitz, putting enormous pressure on the company to prioritize growing and monetizing its users. To do so, Roblox made deliberate decisions that placed children at risk. For example, while other products verified the ages of children and restricted access if a child fell below a certain age, Roblox's app was designed to welcome and encourage children of any age without implementing any age-verification safeguards all the while making signing up for an account extremely easy, ultimately allowing even the youngest and most vulnerable to join.

102. In 2021, riding the explosive growth in users generated by the pandemic and the pandemic-driven enthusiasm for technology stocks, Roblox went public at a valuation of \$41 billion, which brought new pressures. To satisfy the scrutiny and demands of public market investors, Roblox, like many unprofitable companies, prioritized rapid growth in revenue and user engagement metrics—like new user acquisition, daily active users, and average hours spent on the app—on the theory that profitability would follow once the business achieved sufficient scale and operating costs decreased as a percentage of revenue.⁸²

103. In pursuit of growth, Roblox deprioritized reasonably available safety measures even further so that it could report strong numbers to Wall Street. For instance, Roblox executives rejected employee proposals for parental approval requirements that would protect children on the platform.⁸³ Employees also reported feeling explicit pressure to avoid any design changes that

⁸² After listing on the New York Stock Exchange, Roblox CEO David Baszucki told CNBC, “Roblox has been growing for 15 years... That’s a long-term growth path, and we believe that continues forward, even after Covid.” Ari Levy & Jessica Bursztynsky, *Roblox Jumps to \$38 Billion Mark Cap as Public Investors Get Their First Crack at the Popular Kids Game App*, CNBC (Mar. 10, 2021), <https://www.cnbc.com/2021/03/10/roblox-rblx-starts-trading-at-64point50-after-direct-listing.html>. CFO Michael Guthrie added, “As [Covid] restrictions ease, we expect the rates of growth in 2021 will be well below the rates in 2020, however, we believe we will see absolute growth in most of our core metrics for the full year.” *Id.*

⁸³ Hindenburg Research, *supra* note 1.

could reduce platform engagement, even when those changes would protect children from predators.⁸⁴

104. As one former Roblox employee explained, “You’re supposed to make sure that your users are safe but then the downside is that, if you’re limiting users’ engagement, it’s hurting our metrics. It’s hurting the active users, the time spent on the platform, and in a lot of cases, the leadership doesn’t want that.”⁸⁵ That same employee added, “You have to make a decision, right? You can keep your players safe, but then it would be less of them on the platform. Or you just let them do what they want to do. And then the numbers all look good and investors will be happy.”⁸⁶

105. By limiting safety measures within the app’s design, Roblox not only increased its users but also reduced the company’s safety expenses as a percentage of its revenue—a key metric for Wall Street, which views trust and safety costs as detrimental to Roblox’s stock performance. Barclays, for example, identified its “downside case” for Roblox’s stock as “additional safety investments due to its younger demographic . . . becom[ing] a drag on [earnings] margins.”⁸⁷ Barclays also wrote that it viewed increased safety costs as a “negative” in Roblox’s quarterly earnings.⁸⁸

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

⁸⁴ *Id.*

⁸⁵ *Id.*

⁸⁶ *Id.*

⁸⁷ Ross Sandler, Trevor Young & Alex Hughes, *Back on Track Following the 1H Hiccup*, Barclays (Aug. 1, 2024).

⁸⁸ Ross Sandler, Trevor Young & Alex Hughes, *Everything Accelerating, Safety & Security a Top Priority*, Barclays (Nov. 1, 2024).

the company continues to grow and attract millions of additional users.

107. For example, on Roblox’s 2023 fourth quarter earnings call, an analyst praised the “really high level of efficiency” seen in the numbers for infrastructure and trust and safety expenditures and then asked how those figures would evolve over time.⁸⁹ In response, Mike Guthrie, Roblox’s CFO, emphasized the company’s goal of reducing expenses, stating, “cost to serve is the metric that we use and it’s the metric that the [infrastructure] team owns . . . they’re working hard to drive that down...[L]ike you said, it’s about 11% now, ultimately with higher efficiency...we see that as a high-single-digit number over the next few years.”⁹⁰ He added, “[W]e still think there’s more to do there.”⁹¹

108. At other times, Guthrie has reassured investors stating, “look for trust and safety [costs] to scale below linear as we grow”⁹² and that Roblox was “quite happy with” trust and safety costs growing “at a lower rate than our bookings growth.”⁹³

109. Similarly, in the second quarter of 2024, Roblox CEO Baszucki highlighted that, “[i]mportantly, our infrastructure and trust and safety expenditures were 8% lower year-on year.”⁹⁴ Having surrendered to the profit motive and financial interests of their investors, it is unsurprising that Roblox has refused to implement reasonable alternative design features which would rectify the safety threat posed to children by the app’s current defective and unreasonable design.

110. Once public, Roblox also decided to try to attract more adult users to its app which it had historically touted as the “#1 gaming site for kids and teens.”⁹⁵ With the market for underage

⁸⁹ Q4 2023 Earnings Call (Feb. 7, 2024).

⁹⁰ *Id.* (emphasis added).

⁹¹ *Id.*

⁹² Q4 2022 Earnings Call (Feb. 15, 2023).

⁹³ Q3 2022 Earnings Cal (Nov. 8, 2023).

⁹⁴ Q2 2024 Earnings Call (Aug. 1, 2024).

⁹⁵ Roblox, *What Is Roblox*, <http://web.archive.org/web/20170227121323/https://www.roblox.com/> (archived Feb. 27, 2017).

users near saturation, Roblox shifted its growth strategy to attracting older users.

111. In its public offering filings, Roblox identified “age demographic expansion” as a key strategy, explaining that it planned to develop experiences and content that appealed to older users.⁹⁶ For Roblox, “aging up” had benefits beyond user growth—it was also more profitable. Older users offered a distinct financial advantage. While children spend more hours on Roblox, they do not “monetize” as well because they are more constrained in their ability to spend. In contrast, older users, who “have more direct control over their spend” and “monetize better,” are far more lucrative—an outcome that Roblox said it predicted when it started to target older users.⁹⁷

112. Roblox’s executives repeatedly emphasized their strategy of “aging up” the app to attract older users. At the company’s inaugural conference with an investment bank in September 2021, Roblox’s CFO, Michael Guthrie, noted that Roblox had achieved “very good penetration of nine- to twelve-year-olds,” and was focused on adding users over the age of 13.⁹⁸ One plan was to “improve the search algorithms such that older users were finding older content,” or content tailored to their age-related demographic.⁹⁹

113. And at its annual Developer Conference, Roblox CEO David Baszucki encouraged developers to create experiences for older audiences, explaining that Roblox was rolling out features designed to appeal to older users, including use of real names, screen capture and sharing capabilities, video calls, and relaxed chat moderation.¹⁰⁰ These decisions, while framed as growth strategies, reflected Roblox’s willingness to compromise safety, creating new vulnerabilities and

⁹⁶ Roblox Corp., S-1 (Securities Registration Statement) 7 (Nov. 19, 2020).

⁹⁷ Q2 2022 Earnings Call (Aug. 10, 2022).

⁹⁸ Roblox at Goldman Sachs Communicopia Conference (Sep. 9, 2021), <https://ir.roblox.com/events-and-presentations/events/event-details/2021/Goldman-Sachs-Communicopia/default.aspx>.

⁹⁹ *Id.*

¹⁰⁰ Roblox Developers Conference 2023 Keynote (Sep. 8, 2023), <https://www.youtube.com/watch?v=CwLThCghzA4>.

more dangerous circumstances for children in its pursuit of a more profitable, older user base.

114. Roblox executives consistently highlighted progress with the company’s “aging up” strategy on every quarterly earnings call after this until the second quarter of 2023, when CEO Baszucki declared that Roblox had achieved its goal: “We’re no longer talking about aging up. We are a platform for all ages.”¹⁰¹ He also revealed that developers had started to “build specific 17-plus experiences.”¹⁰² This progress was praised by Wall Street investment banks, who noted that aged-up experiences were a promising indicator of “potential sustainable growth tailwinds for Roblox,” reinforcing the company’s pivot toward maximizing profitability.¹⁰³

115. Despite Roblox’s deliberate targeting of older users, it failed to design and then implement into the app any meaningful restrictions on contact between adult and child users or limit the mature content and experiences it solicited from developers to attract older audiences.

116. When asked by an equity research analyst about aged-13-and-up experiences for older users, Roblox CEO Baszucki admitted, “I want to highlight right now that we don’t have any only 13 and up experiences. We have 28% of the top thousand experiences having a majority of 13-plus [users] but those are still experiences that are open to all ages.”¹⁰⁴ Similarly, despite urging developers to build experiences intended for users aged 17 and older, Roblox did not implement any access limitations for younger users.¹⁰⁵ Even investors recognized the connection between older users and the increased risks for children, questioning how Roblox planned to prevent inappropriate content from reaching younger users.¹⁰⁶

117. Not only did Roblox seek to increase adult users while knowing the risks that

¹⁰¹ Q2 2023 Earnings Call (Aug. 9, 2023).

¹⁰² *Id.*

¹⁰³ Benjamin Black et al., *Bookings Back on Track*, Deutsche Bank (Nov. 4, 2024).

¹⁰⁴ Q3 2021 Earnings Call (Nov. 9, 2021) (emphasis added).

¹⁰⁵ Q4 2022 Earnings Call (Feb. 15, 2023).

¹⁰⁶ Q3 2021 Earnings Call, *supra* note 108.

strategy posed to children, but it also sought to encourage relationships between users. At Roblox’s 2023 Developers Conference, Roblox CEO Baszucki revealed Roblox’s strategy to facilitate “real-life relationships” between users—i.e., dating. While he deliberately avoided the word “dating,” he then announced plans to build a product to support it: “I’m not going to use the D word but subsequent[] real-life relationships is going to happen, okay? And we’re going to build a platform to support that.”¹⁰⁷

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

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

2. Roblox materially contributes to child sexual exploitation through the unreasonably dangerous design of its app, inadequate safety features, and refusal to implement basic safety protections

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

121. Roblox designed its app so that anyone can easily communicate with children, creating a virtual world where predators can freely target and groom children. Until November

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

¹⁰⁸ Roblox Developers Conference 2024 Keynote (Sep. 6, 2024); <https://www.youtube.com/watch?v=HwbcWc2CwnM>.

2024, adult strangers could “friend” and chat with children of any age via direct messages and chat with them in an experience through direct messages even if they were not friends. While Roblox offered some adjustable parental controls for users under the age of 13, these children could bypass those controls simply by creating an alternate account falsely identifying as a 13+-year-old user. By designing its app this way, Roblox stripped parents of basic protective options to prevent adult strangers from communicating with their children.

122. This flawed design contrasts sharply with other gaming products like Nintendo, which use preprogrammed dialogue options to tightly control user interactions.¹⁰⁹ By implementing and selling a similar design, Roblox could have significantly reduced—if not eliminated—the grooming and child abuse facilitated by its app because predators would not have been able to solicit any personal information or send any coercive or sexually suggestive messages.

123. Roblox also enabled the common practice in which a predator meets and grooms a child on Roblox and then transitions that child to another platform. For example, Roblox’s March 2022 Community Standards lists Discord as one of only a handful of external applications that users were allowed to link to: “When using Roblox, you may not link to any external websites or services, except for: YouTube, Facebook, Discord, Twitter, and Twitch.”¹¹⁰ Roblox could have prevented users from linking to Discord, where sexualized content is rampant. In fact, the company previously did not allow its users to link to Discord because it could not “risk unfairly exposing underage users to platforms such as Discord.”¹¹¹

124. Roblox also encourages users to communicate on Discord and other messaging platforms by allowing users to include their Discord and other usernames in their Roblox

¹⁰⁹ Carville & D’Anastasio, *supra* note 8.

¹¹⁰ Roblox, Roblox Community Standards (May 6, 2022).

¹¹¹ Roblox, Reminder Regarding Permissible Links (Nov. 2017), <https://devforum.roblox.com/t/reminder-regarding-permissible-links/61736>.

profiles.¹¹²

125. Even when the inappropriate conversations and solicitation of sexually explicit photos and videos occurred on other messaging platforms, Roblox profited when children were coerced with Robux into sending naked and other explicit photos or videos, while the other platform benefited from getting more active users.. Anything that keeps users engaged benefits Roblox and the other chat messaging applications, and by fostering this interconnectivity, Roblox prioritized engagement and mutual profit over the safety of its users, enabling harmful behavior to flourish across its app.

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

127. As Roblox contemplated and rolled out Roblox Connect, it knew that this feature would drastically increase the risk to children on its app. That is because another company had implemented a similar feature with disastrous consequences. Omegle was a chat website that operated from 2009 to 2023. Omegle allowed users, including children, to engage in anonymous chats with strangers. In March 2010, Omegle introduced a video-chat feature. Despite efforts to monitor mature and sexual content, the website became infamous for exposing minors to explicit material, predators, and exploitation. Omegle’s failure to protect users led to numerous incidents,

¹¹² YouTube, *How to Add Discord to Roblox Profile*, <https://www.youtube.com/watch?v=tOd-W3kdm44>.

¹¹³ Josh Taylor, *Roblox Under Fire After Adding Controversial Voice Call Feature*, Dexerto (Nov. 15, 2023), <https://www.dexerto.com/roblox/roblox-under-fire-after-adding-controversial-voice-call-feature-2384564/>.

including criminal cases involving child pornography. In November 2023, the same month Roblox launched Roblox Connect, Omegle announced that it would cease operations. In shutting down, its founder highlighted the site's misuse: "[T]here can be no honest accounting of Omegle without acknowledging that some people misused it, including to commit unspeakably heinous crimes."¹¹⁴ And he thanked one survivor for "opening my eyes to the human cost of Omegle."¹¹⁵ Nevertheless, Roblox introduced voice calls the same month that Omegle shut down.

128. Roblox has refused to implement reasonable design measures that would have protected children using its app. For example, despite having the ability to require basic identity verification, Roblox instead chose to allow users to create accounts without providing their name or email address—a policy that enables predators to easily create multiple anonymous accounts.

129. Roblox could have also required children under 13 to provide their names and email addresses and obtain parental approval—a fundamental protection against predators—but refused to do so. This decision allowed the company to bypass certain protections that are mandated by federal law and designed to protect children. The Children's Online Privacy Protection Act ("COPPA") prohibits companies like Roblox from collecting, using, or disclosing the personal information of children under 13 without verifiable parental consent. COPPA was enacted because Congress recognized the heightened vulnerability of children on the internet. As the Federal Trade Commission ("FTC") noted, children under 13 lack the capacity to "understand fully the potential serious safety and privacy implications" of sharing their personal information.¹¹⁶

130. The FTC has outlined clear and acceptable methods for obtaining verifiable

¹¹⁴ Omegle, <https://www.omegle.com/> (last visited Jul. 15, 2025).

¹¹⁵ *Id.*

¹¹⁶ Federal Trade Commission, *Privacy Online: A Report to Congress* (1998), <https://www.ftc.gov/sites/default/files/documents/reports/privacy-online-report-congress/priv-23a.pdf>.

parental consent. These include: (a) providing a form for parents to sign and return; (b) requiring the use of a credit card or online payment that notifies parents of each transaction; (c) connecting parents to trained personnel via video conference; (d) offering a staffed toll-free number for parental verification; (e) asking knowledge-based questions to confirm identity; or (f) verifying a parent's photo-ID by comparing it to a second photo using facial recognition technology.¹¹⁷

131. Yet instead of implementing safeguards to comply with COPPA, Roblox chose to bypass these design features and safety protections altogether. Roblox intentionally avoids requesting a name or email address during sign-up to sidestep the requirement of verifiable parental consent. In fact, former employees revealed that Roblox considered requiring verifiable consent but ultimately resisted its implementation out of fear that such requirements might drive users away.¹¹⁸ Consequently, creating a Roblox account is alarmingly easy, requiring less than sixty seconds and no meaningful oversight—a choice that prioritizes growth over the safety of its youngest users.¹¹⁹ Another easy-to-implement feature that would have improved safety is adding pop-up safety notices within chats and games to warn users about their behavior or the dangerous behavior of others. But Roblox executives also rejected this change.¹²⁰

132. Additionally, although Roblox knew that predators routinely operate dozens of Roblox accounts at the same time, the company chose not to implement basic blocking of digital identifiers—both the unique network addresses that track internet connections (Internet Protocol or IP addresses) and the permanent hardware identification numbers assigned to devices (Media

¹¹⁷ Federal Trade Commission, *Complying with COPPA: Frequently Asked Questions*, July 2020, <https://www.ftc.gov/business-guidance/resources/complying-coppa-frequently-asked-questions>.

¹¹⁸ Hindenburg Research, *supra* note 1.

¹¹⁹ Scott Tong & James Perkins Mastromarino, *Roblox Attempts to Bar Child Predators as Short Sellers Target the Popular Game Platform*, WBUR (Oct. 21, 2024), <https://www.wbur.org/hereandnow/2024/10/21/roblox-child-predators-safety>.

¹²⁰ Carville & D'Anastasio, *supra* note 8.

Access Control or MAC addresses) that could prevent predators from creating multiple accounts.¹²¹

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

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

135. At all relevant times, Roblox was aware of numerous online gaming and social media platforms (which targeted teenagers and young adults for their apps) that had implemented mandatory age verification safety features as part of their onboarding process—for the purpose of combating the well-known, wide-spread problem of grooming and sextortion which was prevalent on these apps.

136. At all relevant times, Roblox was aware of age-verification technology used by other online gaming and social media platforms that it could have used to improve safety on its app, such as biometric authentication (utilization of a live scan of the user's face to confirm their age), ID document verification (paired with biometric authentication), the utilization of technology to ensure users' profile pictures match the scan, and ongoing / continuous verification (ensuring

¹²¹ *Id.*

¹²² Carl Stroud, *Horried Dad Found Sick Messages from Paedo Predator in His Eight-Year Old Son's Roblox iPad Game*, The Sun (Feb. 15, 2017), <https://www.thesun.co.uk/news/2872376/horried-dad-found-sick-messages-from-paedo-predator-in-his-eight-year-old-sons-roblox-ipad-game/>.

that future logins and actions are performed by the same verified user).

137. At all relevant times, Roblox failed to utilize age-verification technology, or hire skilled third-party vendors to handle age verification screening, despite its longstanding knowledge of the age-verification technology and third-party vendors used by other online gaming and social media platforms and longstanding knowledge of the dangers posed to its minor users.

138. Despite these glaring failures, Roblox aggressively markets and promotes itself as an “industry leader” when it comes to child safety.¹²³ Central to this self-serving narrative is its “accomplishments” of investing in artificial intelligence (“AI”) and machine learning systems supposedly designed to scan and monitor all communications on the app and prevent the sharing of inappropriate content and personally identifiable information.¹²⁴

139. Yet this technology has proven grossly inadequate and insufficient to protect children. For example, Roblox’s filters have inexplicable omissions. While Roblox blocks certain words, like “Snap” and “Snapchat,” to supposedly prevent off-app communications, it allows workarounds such as the use of the ghost emoji (👻), which is widely recognized as a symbol for Snapchat, or alternative spellings, like “Snappy” or “apchat.” Similarly, while the word “Discord” is blocked, users can bypass this filter by using the disc emoji (🍷) or typing variations, like “iscord” or “cord.”¹²⁵ That Roblox selectively blocks the words “Snap,” “Snapchat,” and “Discord” reveals that Roblox is fully aware of the dangers of off-app inappropriate communications, yet chooses not to close these loopholes. And while Roblox prevents users from

¹²³ Q1 2021 Earnings Call (May 11, 2021).

¹²⁴ Roblox, *Safety Features: Chat, Privacy & Filtering*, <https://web.archive.org/web/20240714130904/https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering> (archived Jul. 14, 2024).

¹²⁵ Edwin Dorsey, *Problems at Roblox (RBLX) #5*, The Bear Cave (Oct. 17, 2024), <https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

sharing phone numbers in numerical format, it does nothing to stop users from spelling out the numbers.¹²⁶

140. Beyond Roblox’s ineffective technology, the company also employs a woefully inadequate number of human moderators to analyze and manage content on its platform. With only about 3,000 moderators, Roblox pales in comparison to platforms like TikTok, which, despite having only three times the number of users, employs more than ten times the number of moderators at 40,000.¹²⁷ Roblox attempts to justify this disparity by claiming “[y]ou really can’t judge the quality of these moderation systems by the number of people.”¹²⁸ But the reality tells a different story. Roblox’s moderators, many of them overseas contractors, report being overwhelmed by an unmanageable volume of child safety reports, making it impossible to address all concerns effectively and leaving countless safety issues unresolved.¹²⁹

141. Even the safety data that Roblox touts is flawed and only underscores the growing dangers created by the company’s app. For example, Roblox proudly points to its low percentage of reports to the National Center for Missing and Exploited Children (“NCMEC”)—the leading U.S. nonprofit organization tasked with preventing child exploitation and assisting in the recovery of missing children. Roblox claims that it accounts for less than .04% of reports made to NCMEC.¹³⁰ But this data is entirely self-reported and therefore depends on Roblox’s ineffective content moderation and safety team. This self-reported data to NCMEC—flawed and limited as it

¹²⁶ *Id.*

¹²⁷ Carville & D’Anastasio, *supra* note 8.

¹²⁸ Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety Features, Past Cases of Child Abuse on the Platform*, WBUR (Nov. 18, 2024), <https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features>.

¹²⁹ Carville & D’Anastasio, *supra* note 8.

¹³⁰ Scott Tong & James Perkins Mastromarino, *Roblox Attempts to Bar Child Predators as Short Sellers Target the Popular Game Platform*, WBUR (Oct. 21, 2024), <https://www.wbur.org/hereandnow/2024/10/21/roblox-child-predators-safety>.

is—also reveals a disturbing trend: Roblox’s reports about suspected child sexual exploitation have surged over the years, from 675 reports in 2019 to 13,316 reports in 2023.¹³¹

142. Roblox also boasts that just “0.0063% of [its] total content was flagged for violating” policies. But Roblox itself controls the systems responsible for identifying and flagging violative content.¹³² These lower percentages are thus a reflection not of safety but of Roblox’s ability to minimize the appearance of problems through its own inadequate reporting and enforcement mechanisms. By hiding behind self-serving metrics and refusing to take meaningful action, Roblox has fostered a product experience where children are subjected to irreparable harm while the company continues to reap financial rewards.

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

¹³¹ National Center for Missing & Exploited Children, *2019 CyberTipline Reports by Electronic Services Providers (ESP)*, <https://www.missingkids.org/content/dam/missingkids/pdfs/2019-reports-by-esp.pdf>; *see also* National Center for Missing & Exploited Children, *2023 CyberTipline Reports by Electronic Services Providers (ESP)*, <https://www.missingkids.org/content/dam/missingkids/pdfs/2023-reports-by-esp.pdf>.

¹³² Vikki Blake, *Roblox Reported Over 13,000 Incidents to the National Center for Missing and Exploited Children in 2023*, GamesIndustry.biz (Jul. 23, 2024), <https://www.gamesindustry.biz/roblox-reported-over-13000-incidents-to-the-national-center-for-missing-and-exploited-children-in-2023>.

144. Roblox’s own developers even admit that Roblox is unsafe for children.¹³³ Online forum discussion posts are replete with developers writing that they would not allow their own children to use Roblox, citing pervasive issues with the app’s lack of child safety features. Many of these posts highlight Roblox’s systemic failures and suggest reasonable design changes Roblox could implement to create a safer product but has consistently ignored—for example:

“Unfortunately, it is worse now due to Roblox’s moderation being so abysmal and Roblox being a far more widespread platform. Creeps flock aplenty when before the creep: kid ratio was much much lower . . . Roblox has no interest in actually fixing the issues so long as the bad press doesn’t end up viral.”¹³⁴

“No. Roblox is not safe for children. The amount of NSFW [Not Safe for Work] I see on this platform on a daily basis is unbelievable. I’m surprised COPPA hasn’t taken any action.”¹³⁵

“I believe they need to automatically rate these games for older audiences, if not, you know, removing them entirely. I could keep going on about this issue, but it’s just beating a dead horse at this point.”¹³⁶

“Roblox got banned for bad moderation; Turkey banned it to ‘protect children,’ and they are not wrong. The amount of visits from 10 of these games is, in summary, 100 million+. I don’t want to know how many of these children have seen nudity or even developed a p*rn addiction. But that is a big problem with Roblox doing almost nothing to prevent it.”¹³⁷

145. These statements, coming from individuals familiar with Roblox’s design architecture and operations, paint a picture of a product rife with danger, where harmful content flourishes, predators thrive, and Roblox repeatedly fails to act—even in the face of widespread and urgent warnings.

¹³³ Edwin Dorsey, *Problems at Roblox (RBLX) #5*, The Bear Cave (Oct. 17, 2024), <https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

¹³⁴ *Id.*

¹³⁵ *Id.*

¹³⁶ *Id.*

¹³⁷ *Id.*

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

146. After years of mounting pressure, Roblox recently announced changes to its child safety features. These changes were prompted not by the years of police reports and widespread media coverage but by a scathing report published by a well-known short seller accusing the platform of being a “pedophile hellscape for kids.”¹³⁸ Released on October 8, 2024, the report sparked public outrage, detailing many of the issues described above that Roblox had long ignored.

147. A little more than a month later, Roblox announced a series of changes, including permanently removing the ability to message others outside of games on its app for under 13-year-old users¹³⁹; giving parents a separate dashboard where they can monitor a child’s Roblox account, view the child’s friend list, set spending control, and manage screen time¹⁴⁰; preventing games from using chalkboard writings where people could get around the censoring of communications¹⁴¹; and implementing restrictions to stop under 13-year-old users from accessing new Roblox games that are awaiting maturity ratings.¹⁴²

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

149. And these changes are little more than window dressing—too little, too late, and woefully inadequate. Most fundamentally, Roblox still allows adults to contact and message

¹³⁸ Hindenburg Research, *supra* note 1.

¹³⁹ *Roblox Tightens Messaging Rules for Under-13 Users Amid Abuse Concerns*, Reuters (Nov. 18, 2024), <https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/>.

¹⁴⁰ Robert Booth, *Roblox to Give Parents More Control Over Children’s Activity After Warnings Over Grooming*, The Guardian, (Nov. 18, 2024), <https://www.theguardian.com/technology/2024/nov/18/roblox-to-hand-parents-more-control-over-their-childrens-activity>.

¹⁴¹ *Id.*

¹⁴² *Id.*

children. Specifically, Roblox has only banned user-to-user messaging for users under the age of 13 outside of games. Predators can still message children on public chats while playing games; indeed, Roblox has left child predators a blueprint for finding children on the application intact since predators have always found children by playing games they know that children will frequent. Roblox also failed to address core design defects like the app's lack of age verification and refusal to require parental consent to make an account. Roblox did not commit to hiring more content moderators, nor did it implement any sort of identity check to prevent registered sex offenders from making accounts.

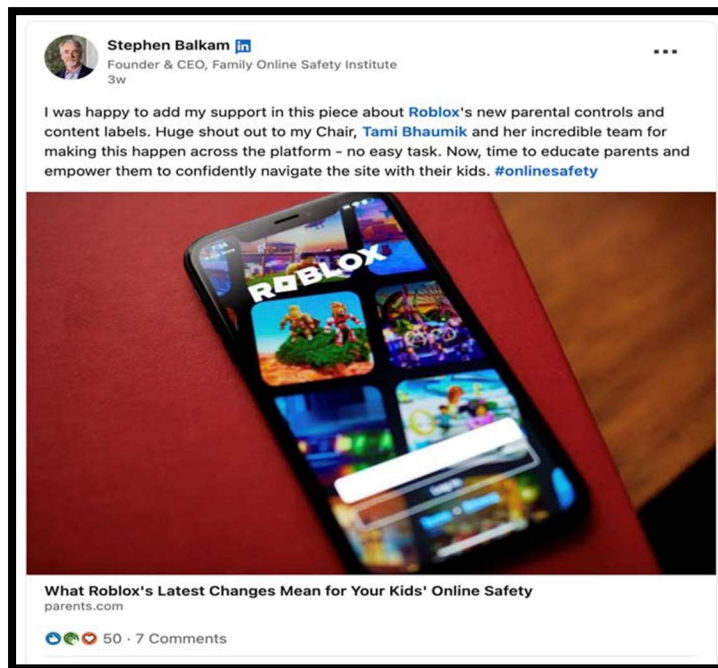
150. Just as Roblox rolled out these changes, it simultaneously introduced a new “Parties” feature in an attempt to counteract any potential loss in user engagement.¹⁴³ Because Roblox knew that users often turned to other platforms like Discord to communicate while playing video games and because Roblox knew that its safety changes would reduce key user engagement metrics, it sought to capture that traffic (and revenue) and replace any loss of engagement with the Parties feature. While the Parties feature is currently only available for users aged 13 and older, such limitations are hollow without robust age verification. And the fact that Roblox has stated that it is exploring making such a feature available to younger users demonstrates that, far from prioritizing safety, Roblox's real focus is protecting its bottom-line.¹⁴⁴

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

¹⁴³ Rebecca Ruiz, *Roblox's New Party Feature Makes Discord Obsolete*, Mashable (Dec. 2, 2024), <https://mashable.com/article/roblox-party-discord>.

¹⁴⁴ *Id.*

Roblox's new features as a win for child safety.¹⁴⁵ What the article omitted, however, is that Roblox's own Vice President of Civility and Partnerships, Tami Bhaumik, serves as FOSI's board chair—an obvious conflict of interest.¹⁴⁶ This calculated relationship exposes how Roblox manipulates public perception by using seemingly independent safety organizations as mouthpieces to shape the narrative in its favor.



Stephen Balkam's LinkedIn post revealing his connection to Roblox in a post praising Roblox's changes.¹⁴⁷

V. PLAINTIFF-SPECIFIC ALLEGATIONS

152. Plaintiff is a retired United States Marine who is married with children. When Plaintiff was around 11-years old, however, he was horrifically and traumatically sexually groomed, exploited, extorted, and sexually molested and abused by a predator through Defendant's dangerous

¹⁴⁵ Anna Halkidis, *What Roblox's Latest Changes Mean for Your Kids' Online Safety*, Parents (Nov. 18, 2024), <https://www.parents.com/roblox-new-parental-controls-8747405>.

¹⁴⁶ *FOSI Welcomes Roblox Vice President as New Board Chair*, FOSI (Oct. 12, 2022), <https://www.fosi.org/about-press/fosi-welcomes-roblox-vice-president-as-new-board-chair>.

¹⁴⁷ LinkedIn, Stephen Balkam's Post, https://www.linkedin.com/posts/stephenbalkam_what-robloxs-latest-changes-mean-for-your-activity-7264409332950220801-WCDF (last visited Jul. 15, 2025).

app, which enabled and facilitated this man's crimes. As the result of Defendant's reckless disregard for child safety, Plaintiff has suffered devastating psychological trauma that has forever changed her life.

153. Plaintiff was around 10-11 years old when he first started playing Roblox. Plaintiff was drawn to Roblox because he had just changed schools, had few friends, and enjoyed building games and Legos as a child. Because Plaintiff downloaded and started playing Roblox in approximately 2007, his account defaulted to a setting which allowed communication between Plaintiff, then around 11 years old, and adults using the app. In fact, when Plaintiff first started playing the app, Defendant had no safeguards in place to prevent adult perpetrators from being introduced to minors through the app.

154. Plaintiff's parents believed that Roblox was safe for children because it was designed and marketed for kids and promoted as being safe and educational.

155. As discussed above, Roblox spent considerable time and money publicly touting the safety and security of the app, which created the public perception that Roblox had created a safe product for kids. This was nothing more than a false façade of safety.

156. In 2007, when Plaintiff was around 11 years old, he met a man in his 30's on Roblox who was using a anime avatar with a youthful appearance, shape, and hair, and he told Plaintiff that he was a teenager—a lie that was possible only because Roblox refuses to design its app with an age-verification system despite having the technological capability to do so.

157. Once granted unfettered access to Plaintiff, the perpetrator began grooming and exploiting the 10-11-year-old boy

158. The predator intensified his grooming of Plaintiff and began by coercing him to send nude and explicit photographs in exchange for being granted access to Roblox "games" or

“environments” or in exchange for Roblox’s digital currency, Robux. The predator ultimately threatened Plaintiff that he would disclose the nude photographs publicly if Plaintiff did not meet him in person and pay him money. Accordingly, Plaintiff traveled to the perpetrator’s home, where he was exposed to pornographic content, made to strip naked and view the naked body of the perpetrator, and subjected to sexual molestation, including the intentional touching of his genitalia, before he could escape from the perpetrator’s home.

159. Plaintiff has suffered profound harm from the grooming and sexual assault that he experienced as a result of Defendant’s app. He has suffered and continues to suffer from severe mental health issues, difficulty trusting others, and continues to need counseling and therapy to cope with the aftermath of this tragedy.

160. Roblox is directly responsible for the harm that Plaintiff has suffered. Had Plaintiff’s parents known the truth about Defendant’s app, they never would have permitted Plaintiff to use it without strict supervision. Had Defendant designed the app with even the most basic screening or age and identity verification, as well as effective parental controls, Plaintiff never would have interacted with this predator and never would have suffered the harm that he did. In short, Plaintiff was irreparably traumatized and injured as a direct result of Defendant’s conduct.

VI. CAUSES OF ACTION

COUNT ONE

STRICT LIABILITY – DESIGN DEFECT

(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

162. At all relevant times, Defendant designed, developed, managed, operated, tested, produced, labeled, marketed, advertised, promoted, controlled, sold, supplied, distributed, and benefitted from the use of its app by Plaintiff.

163. Defendant's app was designed, manufactured, maintained, controlled, and distributed from Defendant's California headquarters.

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

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

166. Defendant's app is marketed and advertised to the public for the personal use of the end-user/consumer.

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

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

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

170. Defendant defectively designed its app to appeal to adult predators by making it easy to find children and enabled their contact, grooming, sexual exploitation, and sexual abuse of children, including Plaintiff.

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

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

173. An ordinarily prudent company, being fully aware of the risks posed to children from sexual predators who can easily identify and exploit children, would not have placed the app on the market.

174. Defendant's app is likewise defectively designed in that it creates an inherent and unreasonable risk of danger; specifically, a risk of grooming, sexual abuse, and sexual exploitation, which can lead to a cascade of harms. Those harms include but are not limited to physical injury, damage to self-worth, stigma and social isolation, reduced academic performance, increased risky behavior, susceptibility to future sexual exploitation, attachment issues, identity

confusion, and profound mental health issues for young consumers, including but not limited to depression, anxiety, suicidal ideation, self-harm, post-traumatic stress disorder, insomnia, death, and other harmful effects.

175. The risks inherent in the design of Defendant's app significantly outweigh any benefits of such design.

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

- a. Requiring children to have parental approval and a parent's email address to sign-up for an account;
- b. Effective parental controls;
- c. Effective parental notifications, including notifying parents any time a child messages another user, particularly an adult user, or notifying parents when children interact with accounts that have been blocked by other users or suspended in the past, among other controls;
- d. Setting default safety settings to the most protective options, including blocking direct messaging between child and adult users, or only allowing messaging between adult users and a child with the parent's explicit permission to message the adult user;
- e. Requiring adults to provide a phone number when signing up for an account;
- f. Pop-up safety notices within chats and games to warn users about inappropriate behavior;
- g. Preventing strangers from sending Robux to child accounts, and preventing children from sending Robux to strangers' accounts;
- h. Banning IP and MAC addresses of accounts associated with known abusers;
- i. Controlled chat option;
- j. Providing a transcript of a child's communications to the parent;

- k. Implementing reporting protocols to allow users or visitors of Defendant's app to report child sex abuse material and adult predator accounts specifically without the need to create or log in to the products prior to reporting;
- l. Robust age and identity verification; and
- m. Others as set forth herein.

177. The absence of the above features, individually and combined, constitutes a design defect. Alternative designs were available that would prevent child predators from finding, grooming, and exploiting children, and which would have served effectively the same purpose of Defendant's product while reducing the gravity and severity of danger posed by the product's defects.

178. Plaintiff used Defendant's app as intended or in reasonably foreseeable ways.

179. The physical, emotional, and economic injuries of Plaintiff were reasonably foreseeable to Defendant at the time of its app's development, design, advertising, marketing, promotion, and distribution.

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

181. Defendant knew or should have known of the unreasonable dangerousness of the app and failed to accompany the product with a warning adequate to guard against the unreasonable danger.

182. As manufacturer, designer, and seller, Defendant had a duty to inform itself with the best knowledge of the risks and the defects of its app and Defendant had such knowledge. Their victims, including Plaintiff, were powerless to protect themselves against unknown harms,

and Defendant should bear the costs of their injuries.

183. Plaintiff was injured as a direct and proximate result of Defendant's defective designs as described herein. The defective design of the product used by Plaintiff was a substantial factor in causing harm to Plaintiff.

184. As a direct and proximate result of Defendant's app's defective design, Plaintiff suffered serious and dangerous injuries.

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

186. Plaintiff was injured from using Defendant's defective app through no fault of his own.

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

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

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

COUNT TWO
STRICT LIABILITY – FAILURE TO WARN
(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

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

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

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

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

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

196. Defendant was in the best position to know the dangers of its products posed to

consumers, including Plaintiff, as it had superior knowledge of the risks and dangers posed by its products and had exclusive knowledge of these risks at the time of development, design, marketing, promotion, advertising and distribution. Defendant had exclusive control of its products at all times relevant to this litigation.

197. Defendant's product is dangerous, to an extent beyond that contemplated by the ordinary user who used Defendant's products, because it enabled predators to find, groom, abuse, and exploit children.

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

199. These risks were foreseeable in light of Defendant's own internal data and knowledge regarding their products at the time of the products' development, design, marketing, promotion, advertising, and distribution to Plaintiff.

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

- a. Sexual predators use Defendant's product to find, contact, groom and abuse children with alarming frequency;
- b. Sexual predators use Defendant's product to solicit, produce, and distribute CSAM with alarming frequency;
- c. Sexual predators target young children for CSAM on Defendant's product with alarming frequency;
- d. Sexual predators use Robux to coerce children into sending them nude photos or engaging in other types of sexually explicit behavior;

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

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

202. Defendant knew or should have known of the inherent dangerousness of its app and failed to accompany it with a quantum of warning adequate to guard against the harms and injuries described herein.

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

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

205. Plaintiff was injured from using Defendant's defective product through no fault of

his own.

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

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

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

COUNT THREE
NEGLIGENCE – UNREASONABLE DESIGN
(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

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

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

212. Defendant knew or, by the exercise of reasonable care, should have known that its app posed risks of harm to youth. These risks were foreseeable in light of Defendant's own

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

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

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

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

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

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

218. Defendant breached its duty in designing its app.

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

220. Defendant breached its duty by designing an app that was less safe to use than an

ordinary consumer would expect when used in an intended and reasonably foreseeable manner.

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

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

- a. Requiring children have parental approval and a parent's email address to sign-up for an account;
- b. Effective parental controls;
- c. Effective parental notifications, including notifying parents any time a child messages another user, particularly an adult user, or notifying parents when children interact with accounts that have been blocked by other users or suspended in the past, among other controls;
- d. Setting default safety settings to the most protective options, including blocking direct messaging between child and adult users, or only allowing messaging between adult users and a child with the parent's explicit permission to message the adult user;
- e. Requiring adults to provide a phone number when signing up for an account;
- f. Pop-up safety notices within chats and games to warn users about inappropriate behavior;

- g. Preventing strangers from sending Robux to child accounts, and preventing children from sending Robux to strangers' accounts;
- h. Banning IP and MAC addresses of accounts associated with known abusers;
- i. Controlled chat option;
- j. Providing a transcript of a child's communications to the parent;
- k. Implementing reporting protocols to allow users or visitors of Defendant's app to report CSAM and adult predator accounts specifically without the need to create or log in to the app prior to reporting;
- l. Robust identity and age verification; and
- m. Others as set forth herein.

223. Alternative designs that would reduce the dangerous features of Defendant's app were available, would have served effectively the same purpose as Defendant's defectively designed app, and would have reduced the gravity and severity of danger Defendant's app posed to Plaintiff and other minor users.

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

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

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

227. Plaintiff was injured from using Defendant's defective app through no fault of her own.

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

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

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

COUNT FOUR
NEGLIGENCE – FAILURE TO WARN
(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

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

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

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

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

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

236. Had Plaintiff and his parents received proper or adequate warnings about the risks of Defendant's app, they would have heeded such warnings.

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

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

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

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

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

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

- m. The likelihood and intensity of these harmful effects is exacerbated by the interaction of each app's features with one another;
- n. Defendant fails to verify identities and ages, allowing adult predators to pose as children on Defendant's app; and
- o. Others as set forth herein.

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

243. At all relevant times, Defendant could have accompanied the sale of its app with a quantum of warning adequate to guard against the harms and injuries described herein.

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

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

246. Plaintiff was injured from using Defendant's defective app through no fault of her own.

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

248. The conduct of Defendant, as described above, was intentional, fraudulent, willful, wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and displayed an entire want of care and a conscious and depraved indifference to the consequences of

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

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

COUNT FIVE
NEGLIGENCE

(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

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

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

253. In addition, Defendant owed a special relationship duty to Plaintiff to protect her against harm caused by its app and employees or by other users. This special relationship duty is

based on the following:

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

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

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

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

257. Defendant knew or, by the exercise of reasonable care, should have known, that the reasonably foreseeable use of its app (as developed, set up, managed, maintained, supervised, and operated by Defendant) was dangerous, harmful, and injurious when used by

youth such as Plaintiff in a reasonably foreseeable manner.

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

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

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

261. Defendant could have avoided Plaintiff's injuries with minimal cost, including, for example, by not including certain features in its app which harmed Plaintiff. Imposing a duty on Defendant would benefit the community at large.

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

263. Defendant owed a heightened duty of care to youth users of its app because the

children's brains are not fully developed, meaning young people are more neurologically vulnerable than adults to abusive contact facilitated by Defendant's app because they have a hard time distinguishing between patterns of genuine friendship and grooming relationships.

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

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

265. Defendant breached its duties of care owed to Plaintiff through its nonfeasance, failure to act, and omissions in the development, setup, management, maintenance, operation, marketing, advertising, promotion, supervision, and control of its app. These breaches

are based on Defendant's own actions in managing its app made available to the public, independent of any actions taken by a third party. Those breaches include but are not limited to:

- a. Failing to implement effective parental controls;
- b. Failing to implement effective parental notifications, such as when a child messages another user, particularly an adult user, or when a child interacts with accounts that have been blocked by other users or suspended in the past;
- c. Failing to require adult users to provide a phone number when signing up for an account;
- d. Failing to implement pop-up safety notices within chats and games to warn users about inappropriate behavior;
- e. Failing to ban IP and MAC addresses of accounts associated with known abusers;
- f. Failing to set default safety settings to the most protective options;
- g. Having an open chat function;
- h. Failing to provide a transcript of a child's communications to the parent;
- i. Failing to implement reasonably available means to monitor for, report, and prevent the use of its app by sexual predators to victimize, abuse, and exploit youth users;
- j. Failing to provide effective mechanisms for youth users and their parents/guardians to report abuse or misuse of its app;
- k. Failing to implement effective protocols to verify ages and identity of all users
- l. Promoting integration and interactivity with other platforms where predators are known to prey on children; and
- m. Others as set forth herein.

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

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

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

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

270. Plaintiff was injured from using Defendant's defective app through no fault of her own.

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

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

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

COUNT SIX
NEGLIGENT UNDERTAKING
(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

275. Defendant rendered parental control services and account safety services to Plaintiff and his parents.

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

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

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

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

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

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

282. Plaintiff's parents relied on Defendant exercising reasonable care in undertaking to render parental control and account safety services.

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

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

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

286. Plaintiff was harmed by his parents' reliance on Defendant to provide effective parental control and account safety services.

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

288. Plaintiff was injured from using Defendant's defective app through no fault of his own.

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

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

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

COUNT SEVEN
FRAUDULENT CONCEALMENT AND MISREPRESENTATION
(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

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

294. Defendant was under a duty to tell the public the truth and to disclose the defective conditions of its app and that the app posed serious safety risks to child users.

295. Defendant breached its duty to the public, users, and their parents by concealing, failing to disclose, and making misstatements about the serious safety risks presented by its app. Even though Defendant knew of those risks based on Defendant's internal reviews, external studies known to Defendant, and parent and police reports made to Defendant, Defendant intentionally concealed those risks to not lose users and revenue, and to induce parents to allow their children to use Defendant's app.

296. Defendant made numerous material representations downplaying any potential harm associated with its app and reassuring the public, users, and parents, that its app was safe, including but not limited to:

- a. "We continually develop cutting-edge technologies to ensure that the Roblox platform remains a safe and fun space for players all over the world";
- b. "Roblox uses a combination of chat filters, both human and software moderation, to proactively remove inappropriate content from the platform";
- c. "We are dedicated to working together with parents and digital safety experts to promote a family-friendly environment that allows all players to imagine, create, and play online";
- d. "We are committed to ensuring that Roblox is a safe and fun place for everyone";
- e. "For users age 12 and under, we take extra precautions to ensure their safety and privacy by automatically enforcing more restricted settings so they can only send a direct message to other users that are accepted as friends on Roblox";
- f. "Roblox provides a fun, supportive, and educational space where your child's imagination can thrive";
- g. "Roblox's state-of-the-art filtering system is actively monitored and dynamically adjusted to prevent inappropriate content and personally identifiable information from being visible on the platform";

- h. Roblox's policies "are designed to make ROBLOX a safe place for people of all ages, including very young children";
- i. "ROBLOX staff" were monitoring the app to ensure its safety, including from predatory behavior; and
- j. "All text on Roblox is filtered regardless of a user's age. For users aged 12 and under, however, we go a step further by automatically placing them on a more restricted chat with reduced filters for 13+ year olds system that allows them to send private messages only to users they have accepted as friends on Roblox."

297. Defendant's representations regarding the safety of its app were false, and Defendant knew that its representations about the safety of its app were false when the statements were made.

298. Defendant intentionally failed to disclose the serious safety risks posed by the design of its app to the public, users, and their parents. Such risks were known only to Defendant through its internal reviews and external studies known to Defendant, as well as parent and police reporting to Defendant, and the public, users, and their parents could not have discovered such serious safety risks.

299. The public, users, and their parents did not know of the serious safety risks posed by the design of Defendant's app, which were known by Defendant.

300. By intentionally concealing and failing to disclose defects inherent in the design of its app, Defendant knowingly and recklessly misled the public, users, and their parents, into believing its app was safe for children to use.

301. By intentionally making numerous material representations, downplaying any potential harm associated with its app, and reassuring the public, users, and parents that its app was safe, Defendant fraudulently misled the public, users, and their parents into believing its app was safe for children to use.

302. Defendant intended for the public, users, and their parents to rely on its representations about the safety of its app.

303. Defendant knew that its concealment, misstatements, and omissions were material. A reasonable person would find information about the risk of grooming, sexual abuse, sexual exploitation, and other serious risks associated with the use of Defendant's app, to be important when deciding whether to allow children to use them.

304. The public, users, and their parents reasonably relied on the representations made by Defendant about the safety of its app for use by children.

305. Defendant intended to deceive the public, users, and their parents by concealing the defects in the design of its app, which made the app unsafe.

306. As a direct and proximate result of Defendant's material omissions, misrepresentations, and concealment of material information was not aware and could not have been aware of the facts that Defendant concealed or misstated, and therefore justifiably and reasonably believed that Defendant's app was safe for children to use.

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

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

309. Defendant's concealment and Plaintiff and his parents' reliance on Defendant's representations about the safety of its app as a substantial factor in causing harm to Plaintiff.

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

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

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

COUNT EIGHT
NEGLIGENT MISREPRESENTATION
(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

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

314. Defendant was under a duty to tell the public the truth and to disclose the defective conditions of its app and that the app posed serious safety risks to child users.

315. Defendant breached its duty to the public, users, and their parents by concealing, failing to disclose, and making misstatements about the serious safety risks presented by its app. Even though Defendant knew of those risks based on Defendant's internal reviews, external studies known to Defendant, and parent and police reports made to Defendant, Defendant intentionally concealed those risks to not lose users and revenue, and to induce parents to allow their children to use its app.

316. Defendant negligently made numerous material representations downplaying any potential harm associated with its app and reassuring the public, users, and parents that its app was safe, including but not limited to:

- a. "We continually develop cutting-edge technologies to ensure that the Roblox platform remains a safe and fun space for players all over the world";

- b. “Roblox uses a combination of chat filters, both human and software moderation, to proactively remove inappropriate content from the platform”;
- c. “We are dedicated to working together with parents and digital safety experts to promote a family-friendly environment that allows all players to imagine, create, and play online”;
- d. “We are committed to ensuring that Roblox is a safe and fun place for everyone”;
- e. “For users age 12 and under, we take extra precautions to ensure their safety and privacy by automatically enforcing more restricted settings so they can only send a direct message to other users that are accepted as friends on Roblox”;
- f. “Roblox provides a fun, supportive, and educational space where your child’s imagination can thrive”;
- g. “Roblox’s state-of-the-art filtering system is actively monitored and dynamically adjusted to prevent inappropriate content and personally identifiable information from being visible on the platform”;
- h. Roblox’s policies “are designed to make ROBLOX a safe place for people of all ages, including very young children”;
- i. “ROBLOX staff” were monitoring the app to ensure its safety, including from predatory behavior;
- j. Roblox’s policies “are designed to make ROBLOX a safe place for people of all ages, including very young children”;
- k. “ROBLOX staff” were monitoring the app to ensure its safety, including from predatory behavior; and
- l. “All text on Roblox is filtered regardless of a user’s age. For users aged 12 and under, however, we go a step further by automatically placing them on a more restricted chat with reduced filters for 13+ year olds system that allows them to send private messages only to users they have accepted as friends on Roblox.”

317. Defendant’s representations that its app was safe for use by children were not true.

318. Defendant had no reasonable grounds for believing its representations that its app was safe for use by children were true.

319. By concealing and failing to disclose, or failing to take reasonable care to disclose

the defects, Defendant negligently misled the public, users, and their parents into believing its app was safe for children to use.

320. By making numerous material representations downplaying any potential harm associated with its app and reassuring the public, users, and their parents that its app was safe, Defendant negligently misled the public, users, and their parents into believing its app was safe for children to use.

321. As a direct and proximate result of Defendant's material omissions, misrepresentations, and concealment of material information, Plaintiff and his parents were not aware and could not have been aware of the facts that Defendant concealed or misstated, and therefore justifiably and reasonably believed that Defendant's app was safe for use.

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

323. Defendant's concealment and Plaintiff and his parents' reliance on Defendant's representations about the safety of its app was a substantial factor in causing harm to Plaintiff.

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

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

COUNT NINE
VIOLATION OF TEX. CIV. PRAC. AND REM. CODE § 98.002
(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

327. As alleged above, Plaintiff was a around 11 years old boy when he was introduced by Roblox to an adult predator in his 30's who would utilize Roblox's game, design, features, and in-game currency, Robux, to coerce, manipulate, exploit, extort and make unlawful sexual contact with Plaintiff in Texas.

328. Defendant knowingly aided, facilitated, materially contributed, and assisted sex traffickers, including the perpetrator who sexually abused Plaintiff, by engaging in the the following affirmative acts:

- a. Designing and selling the app with unique features and functionality, including unrestricted communication between children under the age of 13 and adults, the role of digital currencies in acquiring success, digital goods, and status in the game, and technologies that permit users and avatars to simulate sexualized activities.
- b. Including features in its app that, as described above, are currently structured and operated in a manner that unreasonably creates or increases the foreseeable risk of grooming, coercing for unlawful means, extortion, sexual abuse, and sexual exploitation to youth, including Plaintiff.
- c. Including features in its app that, as described above, are currently structured and operated in a manner that unreasonably creates or increases the foreseeable risk of harm to the physical and mental health and well-being of youth users, including Plaintiff, including but not limited to physical injury, damage to self-worth, stigma and social isolation, reduced academic performance, increased risky behavior, susceptibility to future sexual exploitation, attachment issues, identity confusion, and profound mental health issues for young consumers, including but not limited to depression, anxiety, suicidal ideation, self-harm, post-traumatic stress disorder, insomnia, eating disorders, death, and other harmful effects;
- d. Maintaining unreasonably dangerous features in its app after notice that such features, as structured and operated, posed a foreseeable risk of harm to the physical and mental health and well-being of youth users; and

- e. Facilitating unsupervised and/or hidden use of its app by youth, including by adopting protocols that allow youth users to change their own safety settings or parental controls, and create multiple and private accounts.

329. Defendant knowingly benefitted from its aiding, facilitating, materially contributing, and assistance to sex traffickers, including through transaction fees and revenues earned through the purchase of Robux and other in-game purchase on Defendant's Avatar Store, such as digital clothing or skins, which Defendant at all relevant times knew were being used by sex traffickers.

330. Defendant is liable for violating Texas Civil Practice and Remedies Code Section 98.002

331. Defendant's violation of Texas Civil Practice and Remedies Code Section 98.002, as described above, was intentional, fraudulent, willful, wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and displayed an entire want of care and a conscious and depraved indifference to the consequences of its conduct, including to the health, safety, and welfare of their customers, and warrants an award of punitive damages in an amount sufficient to punish them and deter others from like conduct.

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

COUNT TEN
VIOLATION OF TEXAS DECEPTIVE TRADE
PRACTICES-CONSUMER PROTECTION ACT
(By Plaintiff John Doe Against Defendant Roblox Corporation)

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

334. At all relevant times, Plaintiff was a consumer within the meaning of the Texas Deceptive Trade Practices-Consumer Protection Act insofar as Plaintiff acquired Roblox when it

was sold to the public through retail channels (*e.g.*, the Apple App “Store” and the Google Play “Store”).

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

336. Defendant was under a duty to tell the public the truth and to disclose the defective conditions of its app and that the app posed serious safety risks to child users.

337. Defendant breached its duty to the public, users, and their parents by concealing, failing to disclose, and making misstatements about the serious safety risks presented by its app. Even though Defendant knew of those risks based on Defendant’s internal reviews, external studies known to Defendant, and parent and police reports made to Defendant intentionally concealed those risks to not lose users and revenue, and to induce parents to allow their children to use Defendant’s app.

338. Defendant made numerous material representations downplaying any potential harm associated with its app and reassuring the public, users, and parents, that its app was safe, including but not limited to:

- a. “We continually develop cutting-edge technologies to ensure that the Roblox platform remains a safe and fun space for players all over the world”;
- b. “Roblox uses a combination of chat filters, both human and software moderation, to proactively remove inappropriate content from the platform”;
- c. “We are dedicated to working together with parents and digital safety experts to promote a family-friendly environment that allows all players to imagine, create, and play online”;
- d. “We are committed to ensuring that Roblox is a safe and fun place for everyone”;
- e. “For users age 12 and under, we take extra precautions to ensure their safety and privacy by automatically enforcing more restricted settings so they can only send a direct message to other users that are accepted as friends on Roblox”;

- f. “Roblox provides a fun, supportive, and educational space where your child’s imagination can thrive”;
- g. “Roblox’s state-of-the-art filtering system is actively monitored and dynamically adjusted to prevent inappropriate content and personally identifiable information from being visible on the platform”;
- h. Roblox’s policies “are designed to make ROBLOX a safe place for people of all ages, including very young children”;
- i. “ROBLOX staff” were monitoring the app to ensure its safety, including from predatory behavior; and
- j. “All text on Roblox is filtered regardless of a user’s age. For users aged 12 and under, however, we go a step further by automatically placing them on a more restricted chat with reduced filters for 13+ year olds system that allows them to send private messages only to users they have accepted as friends on Roblox.”

339. Defendant’s representations regarding the safety of its app were false, and Defendant knew that its representations about the safety of its app were false when the statements were made.

340. Defendant intentionally failed to disclose the serious safety risks posed by the design of its app to the public, users, and their parents. Such risks were known only to Defendant through its internal reviews and external studies known to Defendant, as well as parent and police reporting to Defendant, and the public, users, and their parents, could not have discovered such serious safety risks.

341. The public, users, and their parents did not know of the serious safety risks posed by the design of Defendant’s app, which were known by Defendant.

342. By intentionally concealing and failing to disclose defects inherent in the design of its app, Defendant knowingly and recklessly misled the public, users, and their parents, into believing its app was safe for children to use.

343. By intentionally making numerous material representations, downplaying any potential harm associated with its app, and reassuring the public, users, and parents that its app

was safe, Defendant fraudulently misled the public, users, and their parents into believing its app was safe for children to use.

344. Defendant intended for the public, users, and their parents to rely on its representations about the safety of its app.

345. Defendant knew that its concealment, misstatements, and omissions were material. A reasonable person would find information about the risk of grooming, sexual abuse, sexual exploitation, and other serious risks associated with the use of Defendant's app, to be important when deciding whether to allow children to use them.

346. The public, users, and their parents reasonably relied on the representations made by Defendant about the safety of its app for use by children.

347. Defendant intended to deceive the public, users, and their parents by concealing the defects in the design of its app, which made the app unsafe.

348. As a direct and proximate result of Defendant's material omissions, misrepresentations, and concealment of material information, the public, users, and their parents were not aware and could not have been aware of the facts that Defendant concealed or misstated, and therefore justifiably and reasonably believed that Defendant's app was safe for children to use.

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

350. As a direct and proximate result of Defendant's material omissions, misrepresentations, and concealment of material information, Plaintiff sustained serious injuries and harm, including without limitation, mental anguish.

351. Defendant's concealment and Plaintiff and his parents' reliance on Defendant's

representations about the safety of its app as a substantial factor in causing harm to Plaintiff.

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

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

VII. PRAYER FOR RELIEF

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

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

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

VIII. DEMAND FOR A JURY TRIAL

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

Dated: August 13, 2025

Respectfully Submitted,

By: /s/ Alexander E. Wolf

Alexander E. Wolf (Texas Bar No. 24134558)

**MILBERG COLEMAN BRYSON PHILLIPS
GROSSMAN, PLLC**

280 South Beverly Drive, Penthouse

Beverly Hills, California 90212

Tel: (872) 365-7060

awolf@milberg.com

Gary M. Klinger*

Melida L. Maxson*

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

227 W. Monroe Street, Suite 2100

Chicago, IL 60606

Tel: (866) 252-0878

GKlinger@milberg.com

mmaxson@milberg.com

Melissa Nafash*

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

405 E 50th Street

New York, NY 10022

Tel: (212) 946-9305

mnafash@milberg.com

Martin D. Gould*
Michael R. Grieco*
Steven L. Vanderporten*
**STINAR GOULD GRIECO & HENSLEY,
PLLC**
100 N. Wacker Drive, Suite 100
Chicago, Illinois 60606
P: (312) 728-7444
Martin@SGGHLaw.com
Mike@SGGHLaw.com
Steven@SGGHLaw.com

Counsel for Plaintiff

**Pro Hac Vice petition forthcoming*