

**COMMONWEALTH OF KENTUCKY**  
**MADISON CIRCUIT COURT**  
**DIVISION \_\_\_\_\_**  
**CIVIL ACTION NO. \_\_\_\_\_**

COMMONWEALTH OF KENTUCKY, *ex rel.*  
RUSSELL COLEMAN, ATTORNEY GENERAL,

Plaintiff,

v.

ROBLOX, INC., and ROBLOX PREPAID  
COMPANY, LLC;

Defendants.

**COMPLAINT**  
**JURY TRIAL DEMANDED**

Plaintiff, the Commonwealth of Kentucky (“Kentucky” or “Commonwealth”), by and through its duly elected Attorney General, Russell Coleman, in its sovereign and *parens patriae* capacities, brings this suit against the Defendants, Roblox Corporation and Roblox Prepaid Company, LLC (“Roblox” or “Defendants”) and in support thereof states as follows:

**INTRODUCTION**

1. This civil enforcement action is brought by the Kentucky Attorney General against Defendants for their roles in designing, creating, marketing, and disseminating the Roblox social media platform to children and other users within the Commonwealth of Kentucky.

2. Roblox is one of the most popular interactive online gaming platforms in history, specifically among children. Roblox has boasted that as many as two-thirds of all children ages 9 to 12 in the United States have accounts. The platform is similarly popular with U.S. teens.

3. Defendants repeatedly assure parents and the public that Roblox is safe for its user base of minors, but in reality Roblox is a hunting ground for child predators, and Defendants fail to implement basic safety controls to protect child users. Moreover, despite their detailed knowledge of the dangers lurking on the Roblox platform, Defendants knowingly fail—through affirmative misrepresentation and selective omission—to inform Roblox users and their parents about the dangers inherent on the Roblox platform.

4. These dangers are not trivial: They range from child predators acting alone to international organizations—linked with terrorist groups—that are dedicated to child sexual exploitation and self-harm.

5. Defendants could, at any moment, place barriers between their unwitting child user base (and the parents and guardians of that user base) and the monstrous criminals lurking on Roblox. Most obviously, Roblox could accomplish this by requiring informed parental consent prior to allowing minor children to establish an account on Roblox. Instead, Roblox continues—as it has done for almost two decades—to allow children to create accounts without any form of identity verification, nor with any indicia of parental consent.

6. This failure—compounded by many others detailed herein—is intentional, preventable, and unconscionable. For years, Defendants knowingly enabled and facilitated the systemic sexual exploitation and abuse of children across the United States, including in Kentucky. Through willful disregard and deceptive practices, Defendants have permitted and perpetuated an online environment in which child predators thrive, directly contributing to the widespread victimization of minor children in Kentucky.

7. By way of example—and to illustrate the urgency and necessity of this action—extremist “sextortion” groups like 764 have members operating in Kentucky, where they use

platforms like Roblox to recruit, groom, extort, threaten and even conspire to kill children as young as eight years old.<sup>1</sup> Nationwide, stories of grooming and child abductions using Roblox have proliferated in recent years.<sup>2</sup>

8. The infrastructure built by Roblox denies parents and guardians the opportunity to protect their children online and exposes vulnerable children to highly dangerous adult individuals seeking them out.<sup>3</sup> It is not uncommon for players to find themselves in violent or sexual situations within the Roblox universe, with parents reporting children contacted by strangers using third-party chat apps that function as if they are part of the game,<sup>4</sup> chat conversations involving adult elements such as violence or rape,<sup>5</sup> children's avatars being subjected to violent sexual episodes inflicted by other avatars,<sup>6</sup> and children's avatars wandering into areas of Roblox dedicated to cyber sexual activity including avatars depicted without clothes and with exaggerated physical features.<sup>7</sup>

9. Defendants' deliberate failure to implement effective safety measures to protect child users from well-documented predatory threats, along with their ongoing failure to warn

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<sup>1</sup> Dustin Massengill, *Member of extremist 'sextortion' group pleads guilty to racketeering, child murder plot in Kentucky*, WDKY Fox 56 (Feb. 12, 2025), <https://fox56news.com/news/kentucky/member-of-extremist-sextortion-group-pleads-guilty-to-racketeering-child-murder-plot-in-kentucky/> (last visited Oct. 3, 2025).

<sup>2</sup> See, e.g. Viola Flowers, *California man accused of kidnapping 10-year-old he met on Roblox*, NBC News, <https://www.nbcnews.com/news/us-news/kidnapping-roblox-rcna201795> (last updated Apr. 23, 2025) (last visited Oct. 3, 2025).

<sup>3</sup> Burt Helm, *Sex, lies, and video games: Inside Roblox's war on porn*, Fast Company (Aug. 19, 2020), <https://www.fastcompany.com/90539906/sex-lies-and-video-games-inside-roblox-war-on-porn> (last visited Oct. 3, 2025).

<sup>4</sup> Stacey Dittman, *Parent Alert: Is Roblox Safe for Kids? Watch Out for These 4 Dangers*, Defend Young Minds (July 23, 2019), <https://www.defendyoungminds.com/post/is-roblox-safe-for-kids-4-dangers> (last visited Oct. 3, 2025).

<sup>5</sup> Rachel Stonehouse, *Roblox: 'I thought he was playing an innocent game'*, BBC (May 29, 2019), <https://www.bbc.com/news/technology-48450604> (last visited Oct. 3, 2025).

<sup>6</sup> Sarah Perez, *Roblox responds to the hack that allowed a child's avatar to be raped in its game*, TechCrunch (July 18, 2018), <https://techcrunch.com/2018/07/18/roblox-responds-to-the-hack-that-allowed-a-childs-avatar-to-be-raped-in-its-game/> (last visited Oct. 3, 2025).

<sup>7</sup> Nina Young, *Mum horrified after six-year-old stumbles onto explicit Roblox 'sex room'*, Kidspot (June 3, 2018), <https://www.kidspot.com.au/parenting/mum-horrified-after-six-year-old-stumbles-onto-explicit-roblox-sex-room/news-story/74f9543444462d24706a639dd8336834> (last visited Oct. 3, 2025).

parents and children of the foreseeable dangers posed by the Roblox platform, has directly facilitated the widespread sexual exploitation of minors and inflicted severe, lasting harm upon the children of Kentucky.

### **PARTIES**

10. Plaintiff, the Commonwealth of Kentucky, brings this action, by and through its Attorney General, Russell Coleman, in its sovereign and *parens patriae* capacity to protect the interests of the Commonwealth and its citizens. The Attorney General is authorized to take action against Defendants for violation of the Commonwealth's laws and regulations. Russell Coleman is the duly elected Attorney General of Kentucky, an independent constitutional officer of the Commonwealth and its chief law officer, with full authority to initiate and prosecute all cases in which the Commonwealth has an interest. The Attorney General is vested with specific constitutional, statutory, and common law authority to commence proceedings to enforce Kentucky's Consumer Protection Act, KRS 367.110 *et seq.* ("KCPA"), to initiate actions necessary to exercise all common law duties and authority pertaining to the office of the Attorney General under the common law pursuant to KRS 15.020, and pursuant to the Attorney General's *parens patriae* authority, to bring an action in order to protect the Commonwealth's sovereign and quasi-sovereign interests. The Commonwealth is entitled to the protections of sovereign immunity. Pursuant to KRS 49.070(14), the filing of this action shall not be construed as a waiver of that immunity and no counterclaim, set-off, recoupment, cross-claim, or other form of avoidance may be asserted in this action against the Commonwealth. The Attorney General has determined that these proceedings are in the public interest.

11. Defendant Roblox Corporation is a Nevada corporation with its principal place of business located at 3150 S. Delaware St., San Mateo, California.

12. Defendant Roblox Prepaid Company, LLC, is a Kentucky for-profit company incorporated in Franklin County, Kentucky, which maintains a registered agent in Frankfort, Kentucky. Roblox Prepaid Company also maintains its principal place of business at 3150 S. Delaware St., San Mateo, California. Roblox Prepaid Company's sole manager is listed as Defendant Roblox Corporation. The sole role of Roblox Prepaid Company appears to be the issuance of Roblox gift cards, which are then redeemed for "Robux," Roblox's proprietary in-game currency and a primary source of Roblox's income.<sup>8</sup> In Roblox's own words, "[s]ubstantially all of [Roblox's] bookings are generated from sales of virtual currency, which can ultimately be converted to virtual items on the platform."<sup>9</sup>

13. Defendants Roblox Corporation and Roblox Prepaid Company LLC do not function as separate and independent corporate entities. Defendant Roblox Prepaid Company LLC is directly controlled by and managed solely by Defendant Roblox Corporation. Costs related to the production of prepaid gift cards (*i.e.* for printing the cards themselves) are reported publicly as a cost to Roblox Corporation, not to Roblox Prepaid Company.<sup>10</sup> When users purchase Robux through prepaid cards, such payments "are non-refundable and relate to non-cancellable contracts for a fixed price that specify [Roblox Corporation's] obligations."<sup>11</sup> Further, "[t]he Company [meaning Roblox Corporation] offers prepaid cards through online and physical retailers, as well as on the Company website."<sup>12</sup>

14. At all relevant times, and in connection with the matters alleged herein, each Defendant acted as an agent, servant, partner, joint venturer, and/or alter ego of the other

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<sup>8</sup> *Roblox | Gift Cards*, Roblox, <https://www.roblox.com/shopgiftcards?location=us> (last visited Oct. 3, 2025).

<sup>9</sup> Roblox Corp., *Q2 2024 Form 10-Q (Quarterly Report)* at 4, U.S. SEC (Aug. 2, 2024), <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/785cb7e2-c792-470e-9ff1-021a0bbdf077.pdf> (last visited Oct. 3, 2025).

<sup>10</sup> *Id.* at 42.

<sup>11</sup> *Id.* at 48.

<sup>12</sup> *Id.* at 49, referring to definition of "the Company" on pg. 12.

Defendant, and acted in the course and proper scope of such agency, partnership, and relationship and/or in furtherance of such joint venture. Each Defendant acted with the knowledge and consent of the other Defendant and/or directed, authorized, affirmed, consented to, ratified, encouraged, approved, adopted, and/or participated in the acts or transactions of the other Defendant.

15. At all relevant times, and in connection with the matters alleged herein, Defendants constituted a single enterprise with a unity of interest.

16. All of the allegations described in this Complaint were part of, and in furtherance of, the unlawful conduct alleged herein, and were authorized, ordered and/or done by Defendants' officers, agents, employees, or other representatives while actively engaged in the management of Defendants' affairs within the course and scope of their duties and employment and/or with Defendants' actual, apparent and/or ostensible authority.

#### **JURISDICTION AND VENUE**

17. Madison Circuit Court has subject matter jurisdiction over the claims submitted pursuant to KRS 23A.010 and KRS 367.190 as the claims enumerated herein arise exclusively under Kentucky statutory and common law and from the *parens patriae* authority of the Attorney General to act on behalf of the Commonwealth of Kentucky and its citizens. The Commonwealth's claims are in excess of any minimum dollar amount necessary to establish the jurisdiction of the Court.

18. This Court has general personal jurisdiction over Roblox because Roblox maintains the kind of continuous and systematic general business contacts with Kentucky that approximate physical presence. Roblox makes sales in Kentucky, solicits or engages in business in Kentucky, serves Kentucky's markets, and since December 2022, has managed and directed the

operations of a limited liability company incorporated in Kentucky and which has designated an agent for service of process in Kentucky.

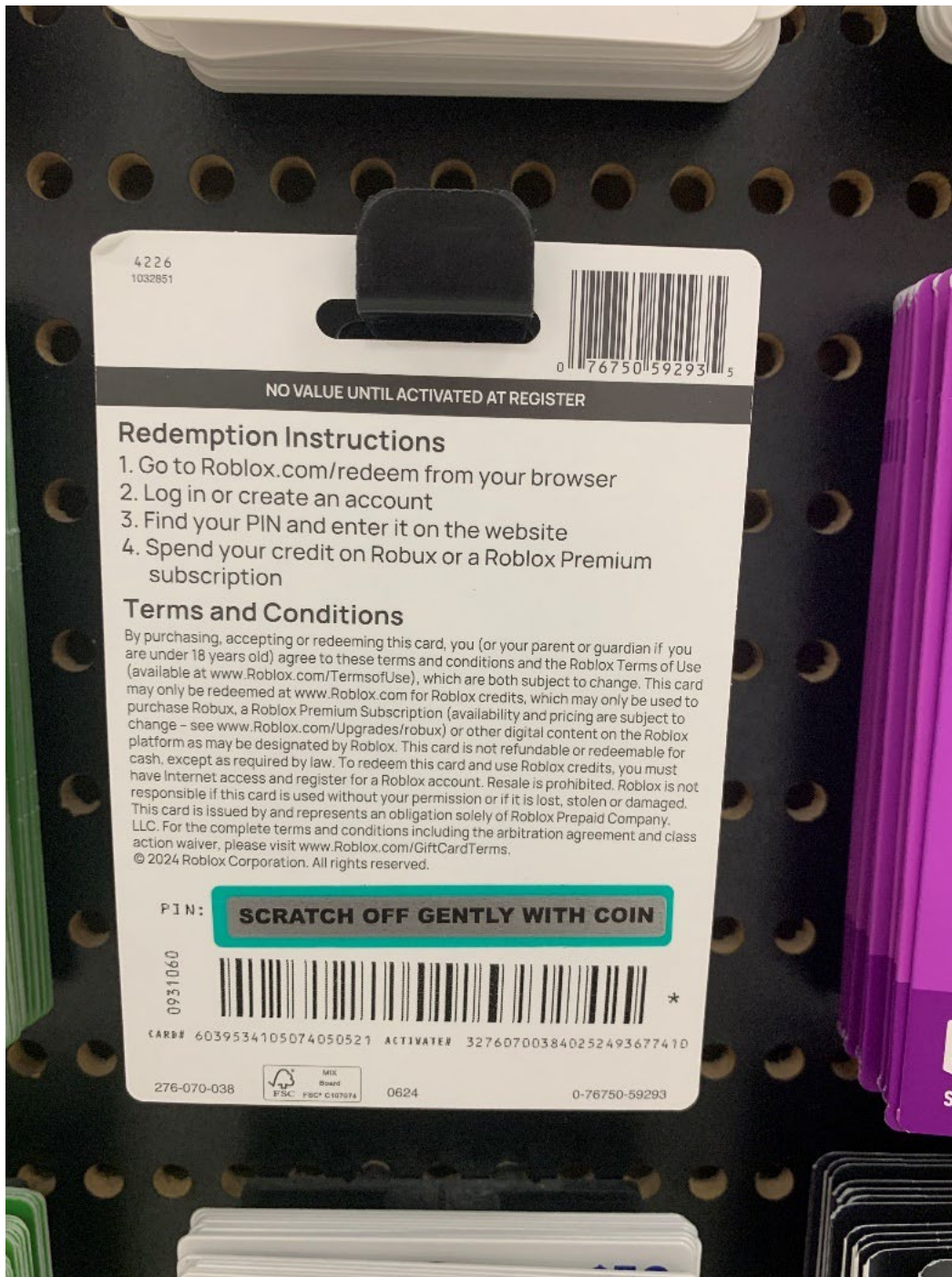
19. This Court also has specific personal jurisdiction over Roblox pursuant to KRS 454.210(2), as it inter alia, contracts to provide services and goods in this Commonwealth, has caused tortious injury in this Commonwealth, and has transacted business here. Since its release in 2006, Roblox has engaged in the development of the Roblox platform and game design system and its promotion on various platforms including PC, iOS, Android, and Xbox systems. At all times relevant to this Action, Roblox targeted its gaming platform to children it knew were located in Kentucky, knowingly acquiring, using, and disclosing children's personal information from devices located in Kentucky, and injuring them in Kentucky.

20. Further, as detailed below, Roblox purposefully conducts business in Kentucky by marketing (1) virtual Roblox goods, and (2) physical Roblox toys and other merchandise to children in Kentucky. This affirmative conduct occurred—and continues to occur—both through online retailers (including the Roblox platform, itself) and through brick-and-mortar retailers which are physically located in Kentucky and which sell Roblox merchandise.

21. As an illustrative example, retailers throughout Kentucky sell physical Roblox items in the form of Roblox gift cards, which may be purchased with values ranging from \$10 to \$100. Children then redeem the value of those cards for “Robux,” a digital currency children use to buy virtual items in Roblox games. Robux are a primary revenue source for Defendants, and as discussed in further detail below, are routinely used by predators as an enticement when grooming or otherwise exploiting vulnerable children on the platform.



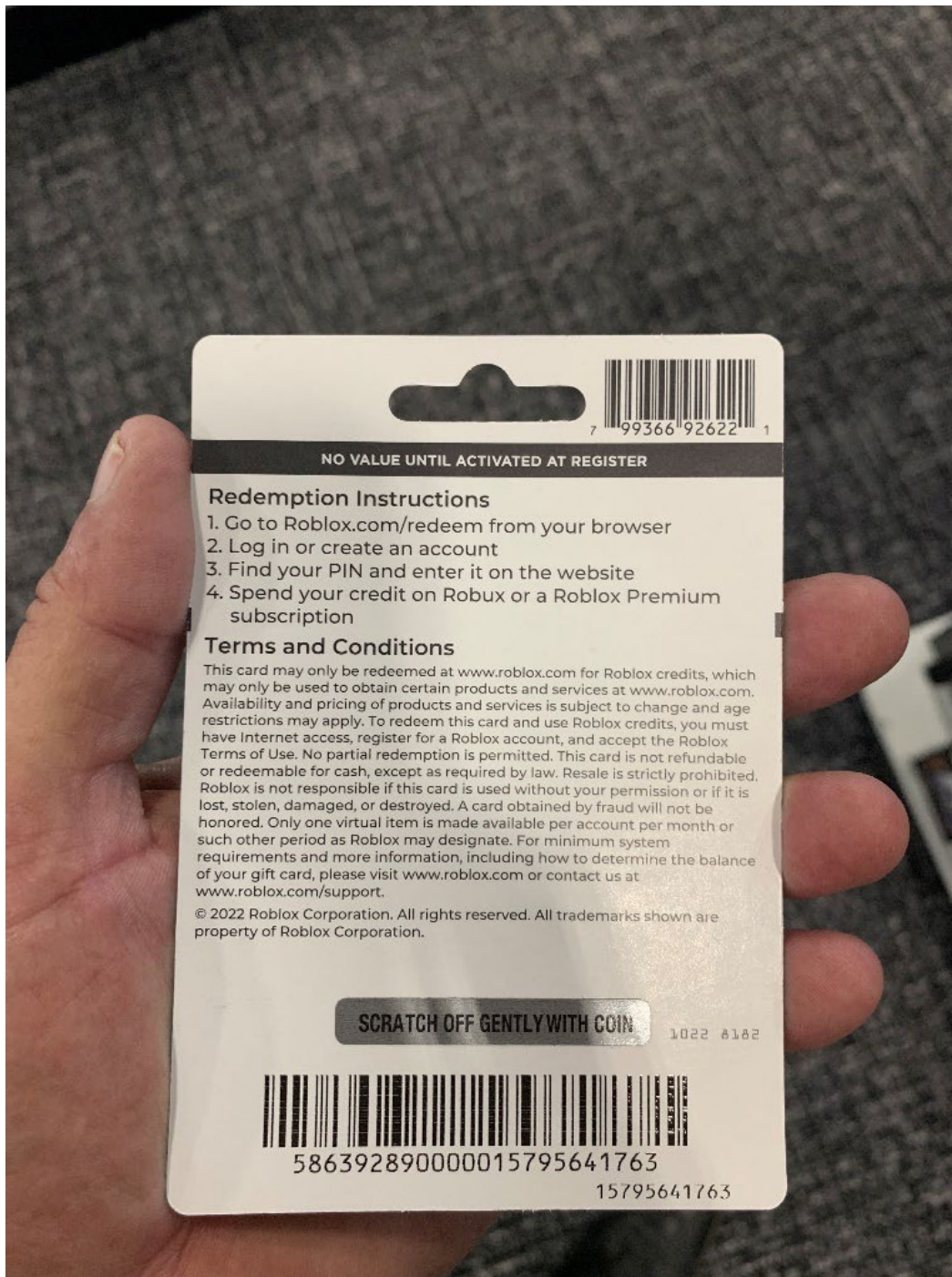
*Fig. 1 –Roblox Gift Cards (Front) for Sale at a Lexington, KY Target.*



*Fig. 2 – Roblox Gift Cards (Back) for Sale at a Lexington, KY Target.*



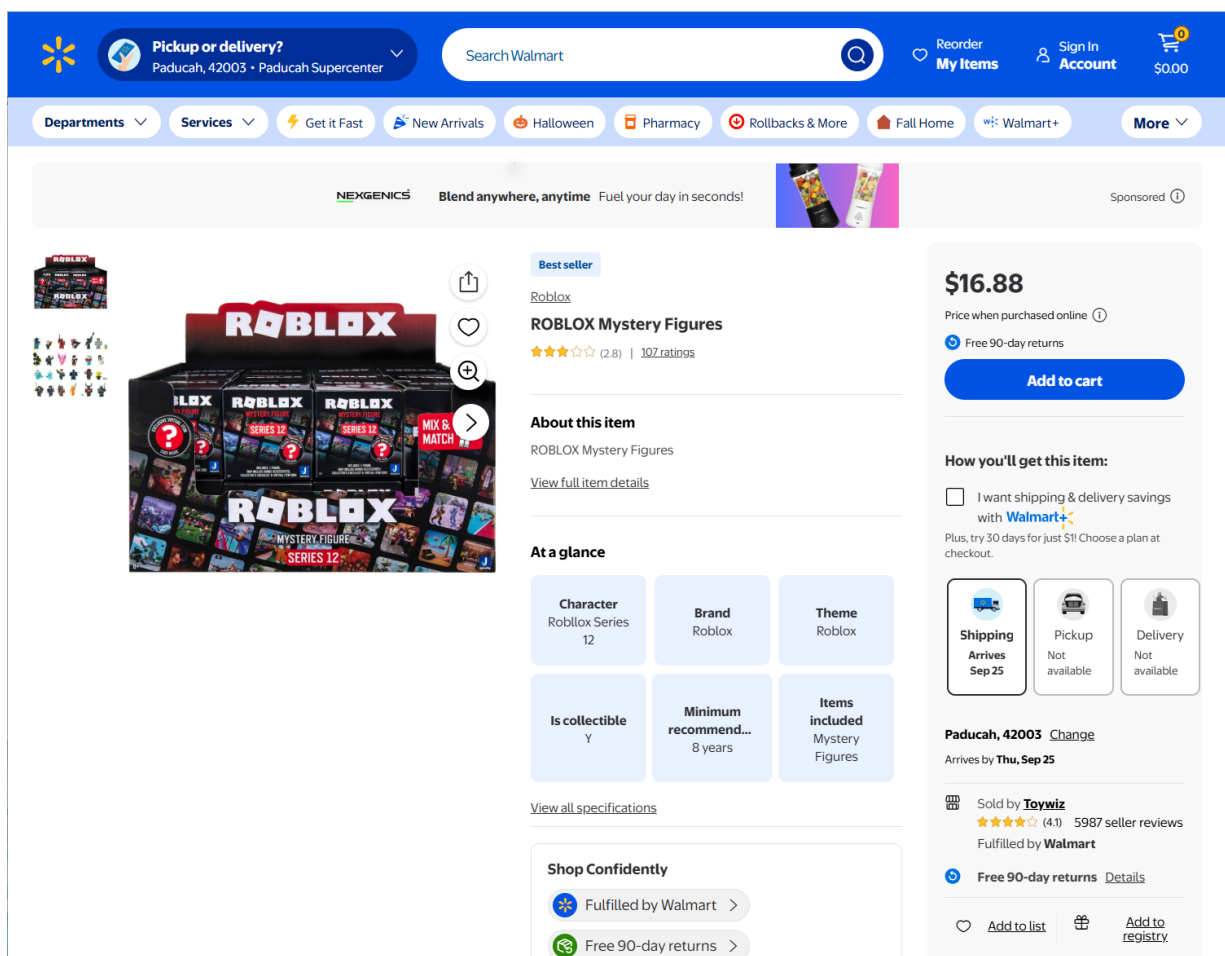
*Fig. 3 – Roblox Gift Cards (Front) for Sale at a Lexington, KY Best Buy.*



*Fig. 4 – Roblox Gift Cards (Back) for Sale at a Lexington, KY Best Buy.*

22. According to Roblox’s website, physical Roblox gift cards are carried at retailers in Kentucky such as Walmart, Target, Walgreens, CVS, Best Buy, 7 Eleven, Dollar General, Family Dollar, GameStop, and Kroger.<sup>13</sup>

23. Beyond gift cards, Defendants sell—either directly or via licensing partnerships—myriad physical items directed at children in Kentucky. For example, Walmart—a retailer with more than 100 locations in Kentucky—sells Roblox toys, including “ROBLOX Mystery Figures,” which are action figures patterned off of characters within Roblox games:



*Fig. 5 - Roblox Action Figures for Sale at a Paducah, KY Walmart*

<sup>13</sup> Roblox | Gift Cards, Roblox, <https://www.roblox.com/giftcards-retailers-us?location=us> (last visited Oct. 3, 2025).

24. It is indisputable that the physical gift cards and toys that Roblox sells at brick-and-mortar locations in Kentucky are meant to drive children onto its platform. But beyond that, Roblox's marketing of physical goods through brick-and-mortar retailers such as Walmart indicates a further interest in luring children onto the platform itself.

25. The causes of action described herein arise in whole or in part from (i) Defendants' active marketing of the Roblox platform to the children of Kentucky without informing parents of the dangers associated with the platform, and (ii) Defendants' sale and use of its Robux in-game currency, which predators use to entice children into dangerous situations and activities.

26. All of these activities are aimed at Kentucky and these activities create a substantial connection with Kentucky sufficient to make the exercise of personal jurisdiction over Roblox reasonable for the courts of the Commonwealth of Kentucky.

27. The instant Complaint does not confer diversity jurisdiction upon the federal courts pursuant to 28 USC § 1332, as the Commonwealth is not a citizen of any state and this action is not subject to the jurisdiction of the Class Action Fairness Act of 2005.<sup>14</sup> Likewise, federal question subject matter jurisdiction pursuant to 28 USC § 1331 is not invoked by the Complaint, as it sets forth herein exclusively viable state law claims against the Defendants. Nowhere herein does Plaintiff plead, expressly or implicitly, any cause of action or request any remedy that arises under federal law. The issues presented in the allegations of this Complaint do not implicate any substantial federal issues and do not turn on the necessary interpretation of federal law. No federal issue is important to the federal system as a whole under the criteria set by the Supreme Court in

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<sup>14</sup> See, e.g. *Postal Tel. Cable Co. v. Alabama*, 155 U.S. 482, 487 (1894) ("A State is not a citizen. And under the judiciary acts of the United States, it is well settled that a suit between a State and a citizen or a corporation of another State is not between citizens of different States. . .").

*Gunn v. Minton*, 568 U.S. 251, 260–61 (2013) (e.g., federal tax collection seizures, federal government bonds). Specifically, the causes of action asserted, and the remedies sought herein, are founded upon the positive statutory, common, and decisional laws of the Commonwealth of Kentucky. Further, the assertion of federal jurisdiction over the claims made herein would improperly disturb the congressionally approved balance of federal and state responsibilities. Accordingly, any exercise of federal jurisdiction is without basis in law or fact.

28. In this Complaint, to the extent Plaintiff may refer—either expressly or impliedly—to federal statutes and regulations, Plaintiff does so to state the duty owed under Kentucky law, not to allege an independent federal cause of action and not to allege any substantial federal question under *Gunn*. Thus, any attempted removal of this complaint based on a federal cause of action or substantial federal question is without merit.

29. Venue is appropriate in Madison Circuit Court under KRS 452.460, which allows venue in the county where the injury was suffered. Whereas the injury is against the Commonwealth, its agents or employees, or the Commonwealth as a whole, venue is proper in Madison Circuit Court.

### **FACTUAL ALLEGATIONS**

#### **I. Since Its Launch in 2006, Roblox Has Quickly Become—and Remains—the Dominant Gaming and Social Platform for Children in the United States.**

##### **A. Roblox, Generally**

30. Roblox is an online gaming platform, which children play via a downloadable mobile app, a standalone website (www.roblox.com), and/or on gaming consoles like Microsoft's Xbox. Access to the platform—and the games contained on the platform—is free. Roblox makes its money through in-game purchases, licensing, and the sale of Robux gift cards.

31. Roblox is easily accessible, including to children as young as six years old. An account can easily be set up by a child in a matter of minutes without the need for (or knowledge of) a parent.

32. At present, there are more than 6.7 million<sup>15</sup> games—also referred to as “experiences”—available to play on the Roblox platform.

33. By and large, Defendants do not create the games/experiences on the Roblox platform. Instead, users create their own games, using the coding tools and infrastructure designed and maintained by Defendants. Those users (often referred to as “developers”) then upload their games to the Roblox platform, at which point other users can play those games. Money is made through in-game purchases (facilitated by the virtual currency “Robux”), and the revenue is split between Roblox and the users/developers.

34. Critically, Defendants explicitly designed Roblox to be an interactive experience. Roblox’s co-founder and CEO David Baszucki explained that his vision is for Roblox to bring about “the next phase of human interaction,” which he also has described as “an entirely new category of human coexperience.”<sup>16</sup> Defendants have similarly explained that Roblox “operates a human co-experience platform ... where users interact with each other to explore and develop immersive, user-generated, 3D experiences.”<sup>17</sup>

35. This means that individual users do not play games on their own, but rather the games are played by numerous individuals, from all over the world, regardless of whether they know each other. Gameplay interactions, user hubs, direct messaging, and voice chat all promote

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<sup>15</sup> *One platform. Millions of ways to engage.*, Roblox, <https://corp.roblox.com/> (last visited Oct. 3, 2025).

<sup>16</sup> David Baszucki, *The CEO of Roblox on Scaling Community-Sourced Innovation*, Harv. Bus. Rev. Magazine (Mar.-Apr. 2022), <https://hbr.org/2022/03/the-ceo-of-roblox-on-scaling-community-sourced-innovation> (last visited Oct. 3, 2025).

<sup>17</sup> Roblox Corp., *Q3 2021 Form 10-Q (Quarterly Report)* at 10, U.S. SEC (Nov. 9, 2021), <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ad69fbb0-a7b7-465b-942f-53206ff42303.pdf> (last visited Oct. 3, 2025).

social interactions between and among users. As explained in further detail below, these features, coupled with Defendants’ historic and ongoing unwillingness to address predatory behavior on Roblox, create a profoundly dangerous environment for children, leading to sexual exploitation and violence.

## **B. Robux – the In-Game Currency of the Roblox Platform**

36. The commercial aspect of the Roblox platform occurs through in-game purchases, which use the Roblox currency, “Robux.” Robux are created exclusively by Roblox, are used to buy Roblox items and upgrades, and are available for purchase on the Roblox website or as an in-app purchase.<sup>18</sup> Robux can then be redeemed in the Roblox Marketplace for characters, clothing, accessories, and more.<sup>19</sup>

37. Robux are sold in exchange for real world currency (\$4.99 for 500 Robux, \$9.99 for 1,000 Robux)<sup>20</sup>, and players can purchase them as a singular item, or can purchase a Roblox membership and receive a monthly Robux stipend.<sup>21</sup>

38. Players are not wary about spending their money on Robux. Roblox generates almost all of its revenue through the sales of Robux and touted an annual revenue of 3.6 billion U.S. dollars in 2024.<sup>22</sup>

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<sup>18</sup> *Buy Robux*, Roblox, <https://www.roblox.com/upgrades/robux> (last visited Oct. 3, 2025).

<sup>19</sup> *Marketplace*, Roblox, <https://www.roblox.com/catalog?Category=1&salesTypeFilter=1> (last visited Oct. 3, 2025).

<sup>20</sup> *Buy Robux*, Roblox, <https://www.roblox.com/upgrades/robux> (last visited Oct. 3, 2025).

<sup>21</sup> *Ways to get Robux*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/203313200-How-to-Get-Robux-RBX-> (last visited Oct. 3, 2025).

<sup>22</sup> *Roblox – Statistics & Facts*, Statista, <https://www.statista.com/topics/7594/roblox-corporation/%23topicOverview> (last visited Oct. 3, 2025).

39. This means real money for Roblox. Roblox “takes a 30% cut of all in-game item sales, sharing the remaining revenue with a pool of roughly 20,000 creators”.<sup>23</sup> Roblox creators earned \$280 million in the fourth quarter of 2024.<sup>24</sup>

40. Players can also earn Robux in the marketplace by creating and selling items such as shirts and pants. Players design the image and upload it to the marketplace for a fee and then publish the item for sale, also for a fee (all payable in Robux), at a cost set by the designer. Other players can spend their own Robux to purchase the item and add to their avatar. Roblox takes a percentage of sales involving Robux.<sup>25</sup>

41. The options available for creation and monetization of Robux in the Roblox universe extends well past making avatar clothing—it also involves creating other in-game purchases such as currency or ammunition for various weapons,<sup>26</sup> animations for an avatar to engage in such as dancing or fighting,<sup>27</sup> power-ups players can add to their avatar’s abilities, creating private game servers to allow for invitation-only play, and even allowing players to advertise their creations in the marketplace and in other games to increase sales.<sup>28</sup>

42. The economy in the Roblox virtual world can be quite lucrative for developers, considering Roblox has paid out \$922 million to developers for their programs<sup>29</sup>. With over 85

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<sup>23</sup> Alexander Lee, *Roblox earnings: Why the platform paid out \$280 to creators in the last quarter*, Digiday (Feb. 7, 2025), <https://digiday.com/media/roblox-earnings-why-the-platform-paid-out-280-million-to-creators-in-the-last-quarter/> (last visited Oct. 3, 2025)

<sup>24</sup> *Id.*

<sup>25</sup> *Marketplace fees and commissions*, Roblox, <https://create.roblox.com/docs/marketplace/marketplace-fees-and-commissions#classic-clothing> (last visited Oct. 3, 2025).

<sup>26</sup> *Marketplace – Accessories – Gear*, Roblox, <https://www.roblox.com/catalog?Category=11&Subcategory=5&salesTypeFilter=1> (last visited Oct. 3, 2025).

<sup>27</sup> *Marketplace – Avatar Animations – Bundles*, Roblox, <https://www.roblox.com/catalog?Category=12&Subcategory=38&salesTypeFilter=1> (last visited Oct. 3, 2025).

<sup>28</sup> *Monetization*, Roblox, <https://developer.roblox.com/en-us/learn-roblox/monetization> (last visited Oct. 3, 2025).

<sup>29</sup> Roblox Corp., *FQ4 2024 Earnings Call* at 3, S&P Global (Feb. 6, 2025), [https://s27.q4cdn.com/984876518/files/doc\\_financials/2024/q4/Q4-2024-Earnings-Call-Transcript.pdf](https://s27.q4cdn.com/984876518/files/doc_financials/2024/q4/Q4-2024-Earnings-Call-Transcript.pdf) (last visited Oct. 3, 2025).

million daily active users enjoying more than 6.2 billion hours of engagement each month, Roblox provides a large marketplace for young developers to grow their customer base.<sup>30</sup>

### **C. At Least Two-Thirds of U.S. Children Under the Age of 13 Have Roblox Accounts**

43. Roblox is an immensely popular gaming platform, with some estimates claiming 380 million monthly users.<sup>31</sup> Over 60% of those users are identified as “school-going age,” and as early as 2021, during the worldwide COVID-19 pandemic, “Roblox host[ed] more students every month than *all* school-going children in the U.S., U.K., and Canada combined.”<sup>32</sup>

44. As early as 2017, Roblox announced that it had become the “top online entertainment platform for both kids and teens,” with triple the amount of monthly visits by children under 13 (25.5 visits in December 2017) of its closest competitor, YouTube (with 7.9 visits in the same month); and roughly double the number of monthly visits for teens (26.9 visits for Roblox in December 2017 compared to 14.7 visits for YouTube in the same month).<sup>33</sup> The same document states that children under 13 spent 51.5 million hours on the platform in December 2017, compared to only 19.4 million hours on YouTube and 3.4 million hours on Netflix.<sup>34</sup>

45. In Defendants’ 2024/2025 Annual Report, the company reported an average of 82.9 million daily active users, with 20% under 9 years of age; 20% from 9-12 years of age; 16%

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<sup>30</sup> *Earn on Roblox*, Roblox, <https://create.roblox.com/docs/production/earn-on-roblox> (last visited Oct. 3, 2025).

<sup>31</sup> Mario Ramic, *Roblox Demographics Statistics 2025*, Takeaway Reality, <https://www.takeaway-reality.com/post/roblox-demographics-statistics> (last visited Oct. 3, 2025).

<sup>32</sup> Hamza Mudassir, *‘Roblox’ isn’t just a gaming company. It’s also the future of education*, Fast Company (March 29, 2021), <https://www.fastcompany.com/90619108/roblox-future-of-education> (last visited Oct. 3, 2025) (first emphasis omitted).

<sup>33</sup> *Roblox Emerges as a Top Online Entertainment Platform for Kids and Teens in 2017*, Roblox, (Mar. 21, 2018), <https://ir.roblox.com/news/news-details/2018/Roblox-Emerges-as-a-Top-Online-Entertainment-Platform-for-Kids-and-Teens-in-2017/default.aspx> (last visited Oct. 3, 2025).

<sup>34</sup> *Id.*

from 13-16 years of age; and 44% at 17 years of age or over.<sup>35</sup> Roblox similarly has reported that *two-thirds of all U.S. children between 9 and 12 years old play games on the Roblox platform, and it's played by a third of all Americans under the age of 16.*<sup>36</sup>

#### **D. Account Creation on Roblox**

46. As noted, individuals who wish to play Roblox must first create an account. Upon going to the Roblox website, opening the Roblox app on a mobile device, or launching the Roblox platform on a gaming console like Xbox or PlayStation, the prospective user sees the following prompt to “SIGN UP AND START HAVING FUN!”

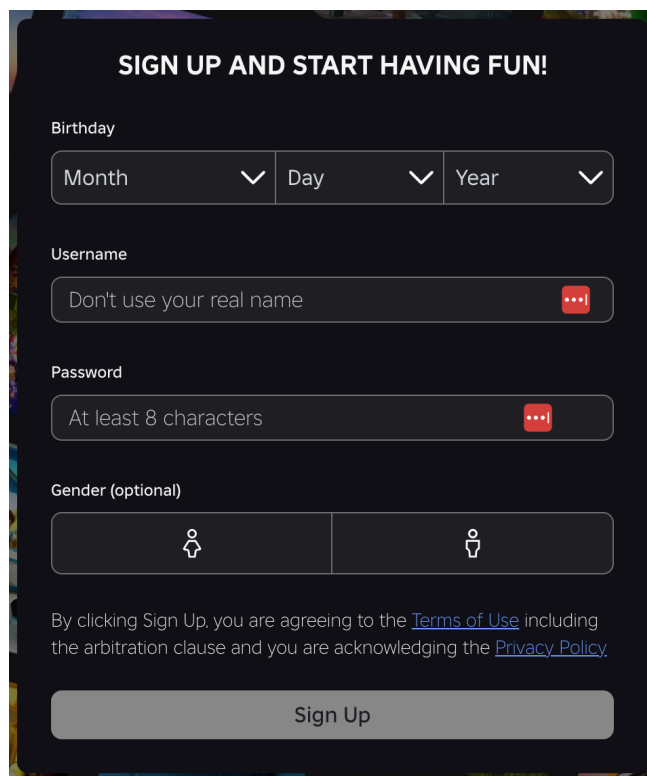
The image shows a Roblox account creation prompt on a dark background. At the top, it says "SIGN UP AND START HAVING FUN!". Below this are four sections: "Birthday" with three dropdown menus for "Month", "Day", and "Year"; "Username" with a text input field containing "Don't use your real name" and a red speech bubble icon; "Password" with a text input field containing "At least 8 characters" and a red speech bubble icon; and "Gender (optional)" with two buttons featuring male and female icons. At the bottom, there is a line of text: "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.

Fig. 6 – *Create an Account Prompt*<sup>37</sup>

<sup>35</sup> *Roblox 2025 Proxy Statement and 2024 Annual Report* at 199, Roblox Corp. (May 29, 2025), [https://s27.q4cdn.com/984876518/files/doc\\_financials/2024/ar/Roblox-2025-Proxy\\_2024-AR-1-1.pdf](https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf) (last visited Oct. 3, 2025).

<sup>36</sup> Olga Kharif, *Kids Flock to Roblox for Parties and Playdates During Lockdown*, Bloomberg (Apr. 15, 2020) <https://www.bloomberg.com/news/articles/2020-04-15/kids-flock-to-roblox-for-parties-and-playdates-during-lockdown> (last visited Oct. 3, 2025).

<sup>37</sup> *ROBLOX – SIGN UP AND START HAVING FUN!*, Roblox, <https://www.roblox.com/> (last visited Oct. 3, 2025).

47. Users are only required to provide a birthdate, username, and password, and children of any age can create an account. Defendants do not have any features in place to prevent children from creating their own accounts and playing on Roblox without first obtaining parental permission. Indeed, Defendants do nothing to confirm or document that parental permission has been given, no matter how young a child is.

48. Further, Defendants do not require users to verify their age upon sign-up. As such, child predators can—and do—establish accounts to pose as children.

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



Fig. 7 - *Example Default Male and Female Avatars on Roblox*<sup>38</sup>

50. Users are also immediately able to play in any of the millions of games on Roblox which are much like video games. The following images – Figures 8 through 12 – are for a test account created for a fictitious user under the age of 13.

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<sup>38</sup> Roblox Wiki, *Avatar*, Fandom, <https://roblox.fandom.com/wiki/Avatar> (last updated Sept. 5, 2025) (last visited Oct. 3, 2025).

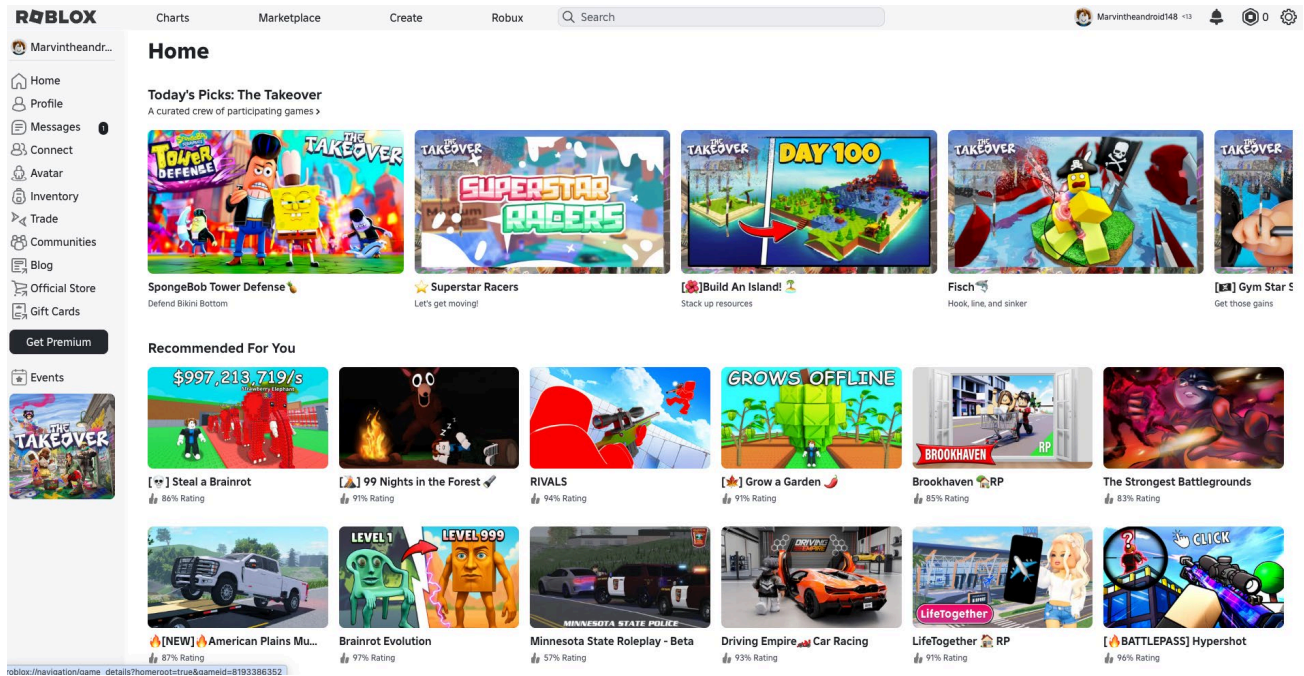


Fig. 8 – The Opening Screen Upon Creating an Account<sup>39</sup>

51. 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 Defendants' algorithm that recommends games to the user.

52. Additionally, the user also is able to immediately join "Communities," which are groups that allow Roblox users to connect with each other outside of games.

<sup>39</sup> Home, Roblox, <https://www.roblox.com/home> (last visited Oct. 3, 2025).

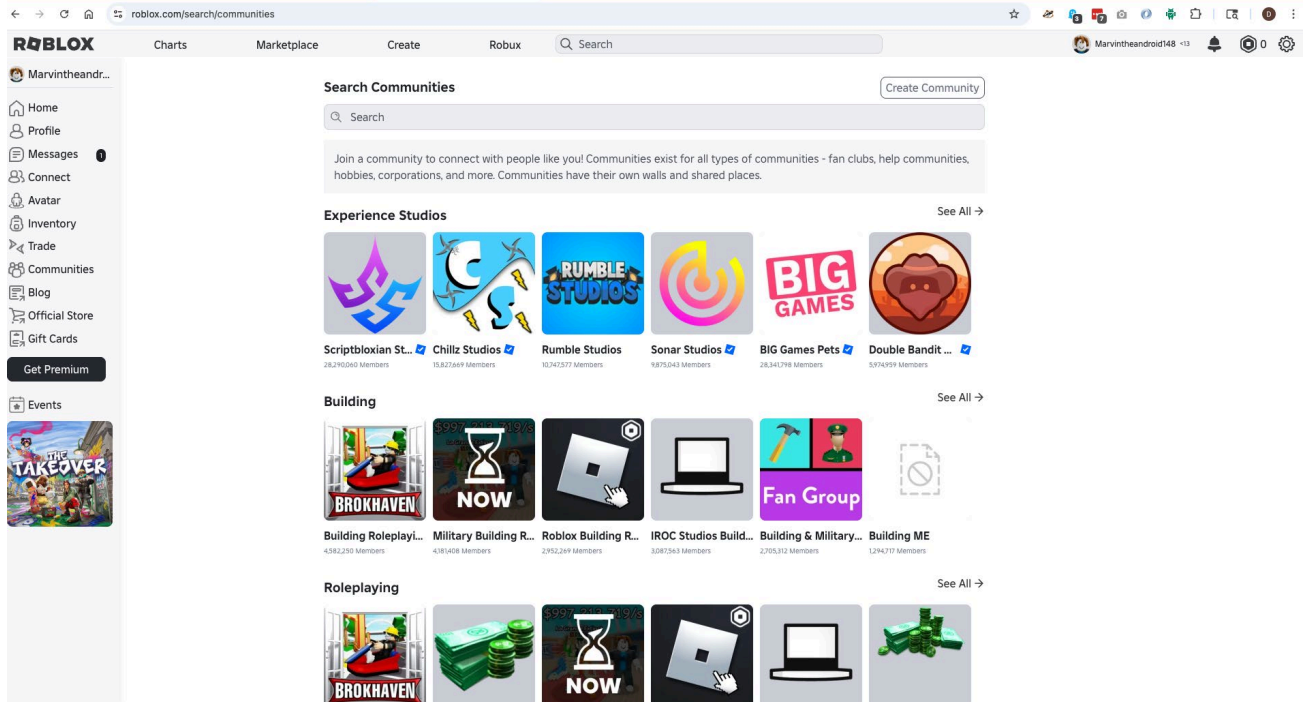


Fig. 9 – Roblox Communities<sup>40</sup>

53. Additionally, upon account creation, a user is able to send and receive private messages on the Roblox platform.

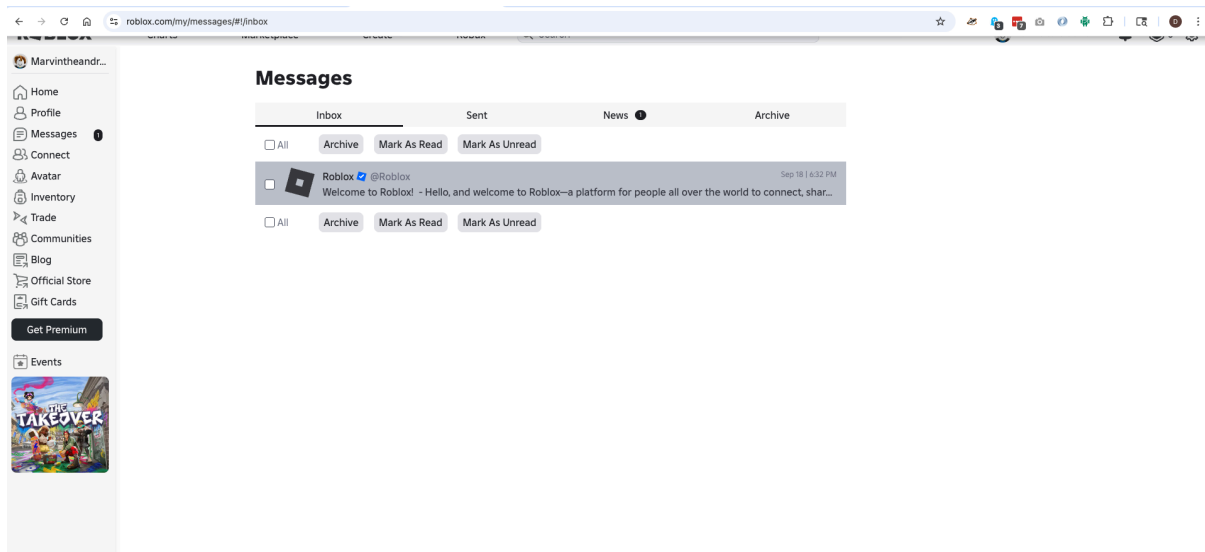


Fig. 10 – Roblox User's Messaging Inbox<sup>41</sup>

<sup>40</sup> Search Communities, Roblox, <https://www.roblox.com/search/communities> (last visited Oct. 3, 2025).

<sup>41</sup> Messages, Roblox, <https://www.roblox.com/my/messages/#!/inbox> (last visited Oct. 3, 2025).

54. Most critically, because children are able to create accounts without the knowledge—much less consent—of a parent or guardian, parental controls are not enabled, and in fact they *cannot be enabled* unless a parent is added to the user’s account. In order even to *find* parental controls, a user must go to the settings button, which is represented as a gear (and not labeled by any words):

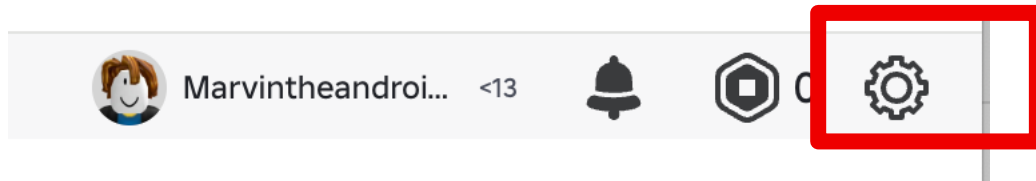


Fig. 11 – *Settings Button*

55. At that point, the user may select the option “Parental Controls,” but no controls may be established, absent a parent being “added.” *E.g.:*

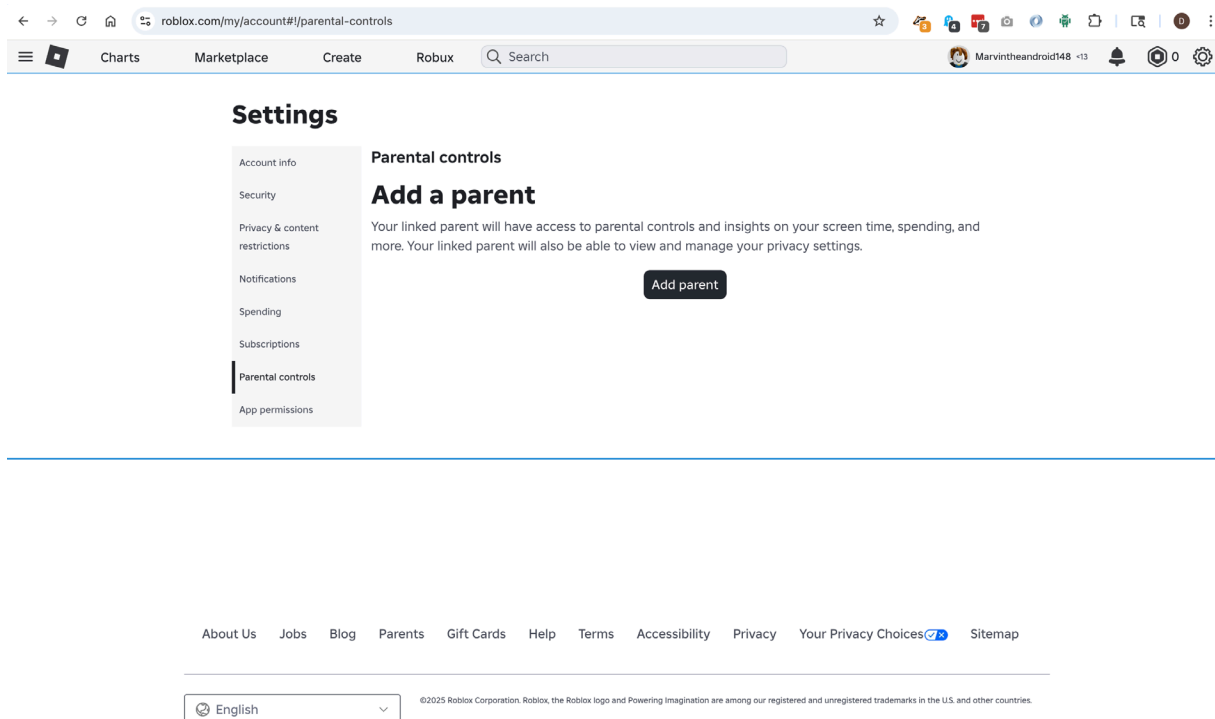


Fig. 12 – *Parental Controls Option in Settings*<sup>42</sup>

<sup>42</sup> *Settings – Parental Controls*, Roblox, <https://www.roblox.com/my/account#!/parental-controls> (last visited Oct. 3, 2025).

56. The absence of default-enabled parental controls is not the only lack of security features on the Roblox platform. At present, and only under certain circumstances, adult strangers are not able to immediately contact accounts identified as under-13 on the platform, but this change only occurred in November 2024. Prior to that date (*i.e.*, for almost two decades) this restriction was *not* in place. Instead, adults could communicate with children without limitation. Adult strangers could “friend” and chat with a child of any age via direct (*i.e.*, private) message and invite a child to a private server or other games on the platform.

57. Roblox’s November 2024 safety features update (the “**November 2024 Safety Updates**”) only placed moderate restrictions on the ability of predators to target and communicate with children on the platform. They are summarized as follows:<sup>43</sup>

- a) Restricted Direct Messaging – Users under 13 may not send direct messages to others unless they are both in a game/experience. Further, those users will be defaulted into a setting in which they can only send public messages, visible to everyone in the game/experience.
- b) Re-Classifying Content Labels – While Roblox previously utilized age-based content labels for games and other experiences on the platform, Defendants changed that process to a system of four categories: Minimal, Mild, Moderate, and Restricted. Defendants further established a setting whereby users under the age of 9 can only access Minimal and Mild content by default, and Moderate content via parental controls.

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<sup>43</sup> <https://corp.roblox.com/newsroom/2024/11/major-updates-to-our-safety-systems-and-parental-controls> (last visited Sept. 22, 2025).

c) Restrictions on Socializing with Users not on Friends List – For under-13 users, Roblox now restricts “experiences primarily designed for socializing with users outside of their friends list.”

d) Updated Parental Controls – Defendants now allow parents to set spending limits and screen time limits for their children’s accounts,<sup>44</sup> to view their child’s account activity on a device other than their child’s, and to view their child’s friends list.

58. Discussed in further detail below, the November 2024 Safety Updates are, demonstrably, too little too late.

## **II. For Years, Roblox Has Been a Known Haven for Child Predators**

59. Given its non-existent barriers to account creation, its attendant astronomical popularity with young children, and the fact that virtually all of the games or experiences on the platform are allowed to be created with no oversight, Roblox quickly became the website of choice for child predators.

60. Defendants’ scripting language, which allows developers to manipulate avatar activity and interactions any way they want, was deployed to create scenarios where avatars engaged in simulated sexual activity. This simulated sexual activity pervades Roblox, as Defendants well know. Parent reviews of Roblox on sites like *Common Sense Media* also document disturbing incidents of naked avatars, sexting, simulated sexual assault, and adult predators.<sup>45</sup>

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<sup>44</sup> As discussed in greater detail below, updated parental controls require the parent to be aware of the child’s Roblox account in the first instance. Defendants do not require parental approval or even acknowledgement when a child creates an account.

<sup>45</sup> *Parent Reviews of Roblox*, Common Sense Media, <https://www.commonsensemedia.org/website-reviews/roblox/user-reviews/adult> (last visited Oct. 3, 2025)

61. 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.<sup>46</sup> In describing the aftermath of this traumatic 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.”<sup>47</sup>

62. Horrifyingly, the abuse children face through predators on Roblox is not merely virtual. There are myriad instances of predators harming the children they meet on Roblox, in real life.

63. As just one example, in 2023, a 27-year-old Delaware man kidnapped an 11-year-old girl from New Jersey after the two met on the Roblox platform.<sup>48</sup>

64. Similarly, that same year, a 13-year-old boy was abducted in Utah and repeatedly sexually assaulted by a predator he first met on Roblox.<sup>49</sup> Many more examples exist, and this list is by no means exhaustive.

65. Roblox also hosts a staggering number of experiences centered on simulated sexual activity. For instance, children can play in “**condo games**” – predatory digital

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<sup>46</sup> Savannah Levins, *North Carolina Mom Outraged After Roblox Game Depicts Violent Acts, Including Rape*, WCNC News (June 30, 2018), <https://www.wcnc.com/article/news/local/north-carolina-mom-outraged-after-roblox-game-depicts-violent-acts-including-rape/275-569365001> (last visited Oct. 3, 2025).

<sup>47</sup> *Id.*

<sup>48</sup> Kemberly Richardson, *Man charged in kidnapping of 11-year-old he met through Roblox from her NJ home*, WABC Eyewitness News 7 (Oct. 21, 2023), <https://abc7ny.com/post/roblox-kidnapping-new-jersey-online-grooming/13927383/> (last visited Oct. 3, 2025).

<sup>49</sup> Ben Goggin, *A 13-year-old boy was groomed publicly on Twitter and kidnapped, despite numerous chances to stop it*, NBC News (April 25, 2023), <https://www.nbcnews.com/tech/social-media/twitter-elon-musk-boy-kidnapped-groomed-discord-roblox-mcconney-rcna77985> (last visited Oct. 3, 2025).

environments, including houses, where users can remove their avatars' virtual clothing, revealing nudity, and engage in disturbing simulated sexual activities with other Roblox users.<sup>50</sup>

66. In one instance in 2018, a 6-year-old wandered into a “sex room,” with dozens of players engaging in simulated intercourse.<sup>51</sup>



Fig. 13 – Roblox “sex room” found by a 6-year-old girl<sup>52</sup>

67. The girl had been invited to this “experience” after accepting a friend request from a stranger.<sup>53</sup>

68. As recently as September of this year, reporting has told the story of an autistic teen that believed for years he was friends with someone on Roblox named “Nate.”<sup>54</sup> “Nate” eventually convinced the victim to disable various parental controls and move their chats off of Roblox, where “Nate” began sextorting the victim, threatening to disclose private conversations unless the victim provided explicit photos. “Nate’s” victim killed himself in April 2024 at the age

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<sup>50</sup> EJ Dickson, *Inside the Underground Strip-Club Scene on Kid-Friendly Gaming Site Roblox*, Rolling Stone (Sept. 12, 2021), <https://www.rollingstone.com/culture/culture-features/roblox-virtual-strip-clubs-condo-games-sex-1197237/> (last visited Oct. 3, 2025).

<sup>51</sup> Jason Murdock, *What is ‘Roblox’? Game Leaves Mother Shocked as 6-Year-Old Finds ‘Sex Room’*, NewsWeek (June 4, 2021), <https://www.newsweek.com/what-roblox-roleplay-game-leaves-mother-shocked-6-year-old-discovers-sex-room-957082> (last updated June 5, 2018) (last visited Oct. 3, 2025).

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*

<sup>54</sup> Eli Tan, *He Made a Friend on Roblox. Their Relationship Turned Sinister*, New York Times (Sept. 12, 2025), <https://www.nytimes.com/2025/09/12/technology/roblox-lawsuit-child-safety.html> (last visited Oct. 3, 2025).

of 15. Law enforcement would later inform the victim’s parents that “Nate” was likely a 37-year-old man who had recently been arrested in Florida for possession of child sexual abuse material (“CSAM”).<sup>55</sup>

69. Similarly, in December 2024—notably, after the November 2024 Safety Updates were announced—a journalist in Colorado wrote an article detailing her 8-year-old son’s experiences on Roblox. Titled *Margo: How Roblox robbed our child of his innocence*, the journalist detailed a litany of catastrophes, from her son’s addiction to the game, to spending hundreds of dollars in unauthorized purchases of Robux (including \$300 spent in a single day), to ultimately being sexually harassed in a public game.<sup>56</sup>

70. Defendants also hosted or are hosting more than 900 Roblox accounts displaying variations of convicted sex trafficker Jeffrey Epstein’s name,<sup>57</sup> as well as “hundreds” of games/experiences that are based around Sean “Diddy” Combs,<sup>58</sup> a disgraced music mogul who recently underwent a widely-publicized criminal trial for a litany of sex-related felonies.<sup>59</sup>

71. Contrary to its threadbare public recitations regarding its focus on safety, Roblox’s dismissive attitude towards these issues is demonstrated by the sheer volume of content that continues to exist on the platform and how long these problems have persisted without meaningful solutions. For nearly a decade, Roblox has known about games like “The Condo,” a Roblox experience featuring a “writhing crowd of naked Roblox avatars,” featuring “profanely

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<sup>55</sup> *Id.*

<sup>56</sup> Ali Margo, *Margo: How Roblox robbed our child of his innocence*, Aspen Daily News (Dec. 16, 2024), [https://www.aspendailynews.com/opinion/margo-how-roblox-robbed-our-child-of-his-innocence/article\\_42607be2-bb93-11ef-9081-5b2f829003b0.html](https://www.aspendailynews.com/opinion/margo-how-roblox-robbed-our-child-of-his-innocence/article_42607be2-bb93-11ef-9081-5b2f829003b0.html) (last visited Sept. 22, 2025).

<sup>57</sup> Laura Fichten, *Roblox, one of the world’s most popular gaming platforms, bans hate speech. Users have found a way to spread it anyway*, CBS News (Aug. 23, 2025), <https://www.cbsnews.com/news/roblox-spray-paint-hate-speech/> (last visited Oct. 3, 2025).

<sup>58</sup> Hindenburg Research, *Roblox: Inflated Key Metrics For Wall Street And A Pedophile Hellscape For Kids* (Oct. 8, 2024), <https://hindenburesearch.com/roblox/> (last visited Oct. 3, 2025).

<sup>59</sup> Wesley Morris, *The Diddy Trial Is Over. But My Mind is Still Racing*, NY Times (July 3, 2025), <https://www.nytimes.com/2025/07/03/podcasts/diddy-sean-combs-verdict.html> (last visited Oct. 3, 2025).

exaggerated anatomies” having simulated sex with each other while speech bubbles above these avatars featured a mix of profanity and hate speech.<sup>60</sup> Today, eight years later, a quick search of TikTok or YouTube still reveals thousands of screen-captured videos of simulated sex from Roblox, often advertising the “best condo games on Roblox.”

72. Indeed, the sex games on Roblox have become so popular and pervasive that there is a sub-genre of Roblox-generated videos uploaded to major pornography websites. These videos are clearly marked with the “.rbxl” file extension—Defendants’ proprietary file format—establishing that the content was created within Roblox.<sup>61</sup>



Fig. 14 – Screen Shot of Pornographic Video Made Via Roblox,  
Hosted on the Popular Pornography Website XVideos<sup>62</sup>

<sup>60</sup> Helm, *supra* note 3.

<sup>61</sup> Hindenburg Research, *supra* note 55.

<sup>62</sup> *Id.*

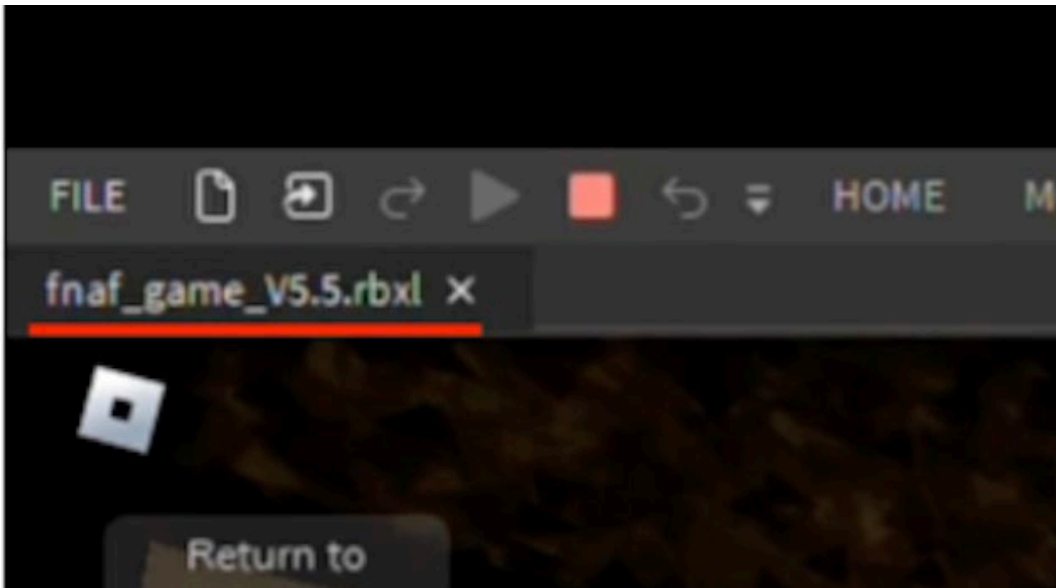


Fig. 15 – *Enlargement of Upper Left Corner of Fig. 14, supra, Showing That the File Format is “.rbxl,” Which is the Proprietary Format of Defendant’s Platform*<sup>63</sup>

73. The dangerous content on Roblox is not limited to its games. A recent investigative report 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.”<sup>64</sup> Tracking the group’s members unearthed *additional* groups engaged in the same criminal conduct, including one with 103,000 members.<sup>65</sup> Yet, Defendants failed to implement any age restrictions on these criminal groups or remove them entirely, deliberately leaving them accessible to all users.<sup>66</sup>

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<sup>63</sup> *Id.*

<sup>64</sup> *Id.*

<sup>65</sup> *Id.*

<sup>66</sup> *Id.*

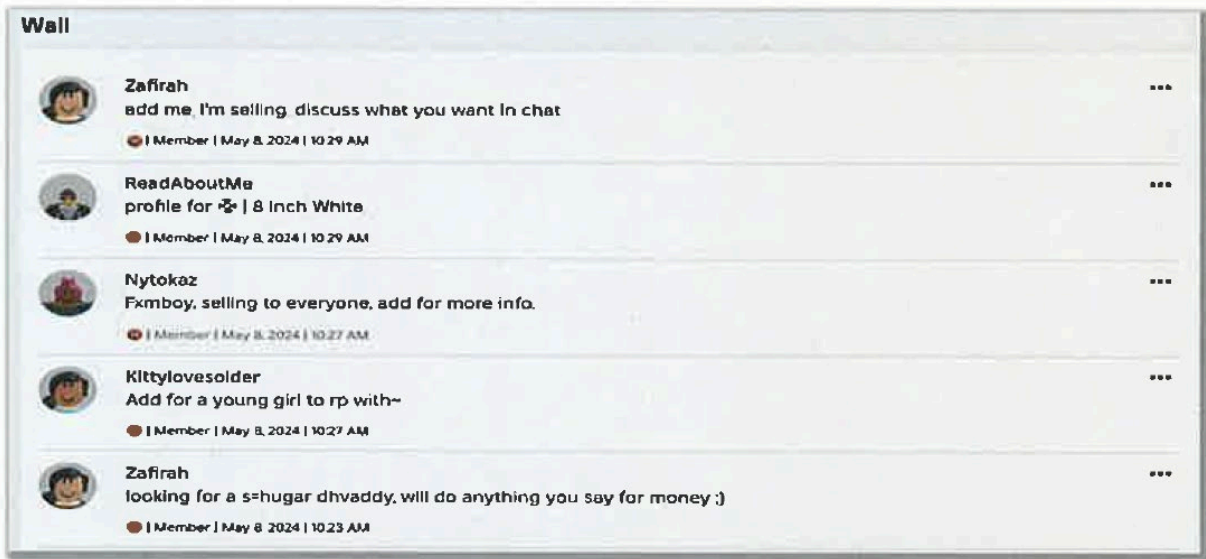


Fig. 16 – Public Chat Wall for a Group Named “Adult Studios,” Where Users Openly Solicited Child Sexual Abuse Material<sup>67</sup>

74. Roblox, in effect, serves as a preliminary grooming environment for predators. Media reports repeatedly have highlighted that Roblox “is being used as a first point of contact for predators.”<sup>68</sup> These systematic patterns of exploitation and abuse on Roblox follow a predictable and preventable sequence that Defendants have known about and facilitated for years: A predator befriends a vulnerable young victim—often by misrepresenting his or her age and pretending to be a fellow child—and then manipulates the child to move the conversation to other apps, such as Snapchat or Discord.

75. Once on another app, predators escalate their exploitation and abuse by soliciting explicit material, like nude photos or videos of children doing sexually inappropriate acts, all of

<sup>67</sup> *Id.*

<sup>68</sup> *The Dirty Dozen List '24: Roblox, A Mainstream Contributor to Sexual Exploitation*, Nat’l Ctr. on Sexual Exploitation, <https://endsexualexploitation.org/roblox/> (last updated Dec. 4, 2024) (last visited Oct. 3, 2025) (Under header “Proof – Evidence of Exploitation,” click sub-header “‘Robux’ Currency Offered to Children to perform Sexual Acts,” to reveal relevant content.).

which constitute CSAM. And while the ultimate solicitation of explicit photos or other criminal acts may occur on other apps, Roblox serves as the critical facilitator that enables these predators to first identify, target, groom, and gain the trust of young victims through its inadequate safety measures and failure to provide notice of its lack of safety measures.

76. As the recent *Bloomberg Businessweek* article titled *Roblox's Pedophile Problem* put it, "These predators weren't just lurking outside the world's biggest virtual playground. They were hanging from the jungle gym, using Robux to lure kids into sending photographs or developing relationships with them that moved to other online platforms and, eventually, offline."<sup>69</sup> This conduct by predators is being done openly on Roblox.

77. Roblox has steadfastly refused to address its role as the "playground" where pedophiles pretend to be children in order to make initial contact with victims and build rapport with them. Instead, Roblox blithely clings to the supposed effectiveness of its chat filters and attempts to divert media attention toward other platforms where these chats become more explicit and dangerous.

78. Regardless of how the initial grooming relationship begins on Roblox, predators often attempt to make in-person contact with the child with the intention of sexually assaulting the child.<sup>70</sup> Through numerous well-documented and publicized cases, Defendants have long been aware of the systemic exploitation that Roblox enables and facilitates. For years, countless children have been sexually exploited and abused by predators they met on Roblox.

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<sup>69</sup> Olivia Carville & Cecilia D'Anastasio, *Roblox's Pedophile Problem*, Bloomberg Businessweek (July 23, 2024), <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/> (last visited Oct. 3, 2025).

<sup>70</sup> Grace Toohey, *Chilean man groomed 13-year-old girl on Roblox before flying to U.S. to meet her, police say*, L.A. Times (April 22, 2024), <https://www.aol.com/news/chilean-man-groomed-13-old-193620082.html> (last visited Oct. 3, 2025).

79. The dangerous progression from Roblox’s online to real-world sexual violence reveals the devastating consequences of Defendants’ deceptive conduct. Roblox is designed to allow predators easy access to children and to use Roblox to groom and lure children from virtual contact to physical meetings, leading to harassment, kidnapping, trafficking, violence, and sexual assault of minors, all instances of which these children suffer as a direct result of Defendants’ actions and inactions.

80. Defendants’ systematic endangerment of children has been publicly condemned by leading advocacy organizations. The National Center on Sexual Exploitation (“NCOSE”) has consistently named Roblox to its “Dirty Dozen” list—an annual campaign exposing companies that facilitate, enable, or profit from sexual exploitation. The NCOSE blasts Roblox for “treat[ing] child protection like a game.”<sup>71</sup> According to the NCOSE, “[u]ntil basic child protection standards are met, Roblox remains too high risk for kids.”<sup>72</sup>

### **III. Specific Platform Features, Designed and Implemented Exclusively by Defendants, Make Roblox Unsafe for Children**

#### **A. Design Features That Lead to Child Endangerment**

##### *i. Ease of account creation and failure to verify ages*

81. Defendants refuse to implement simple measures that would protect children. Most glaringly, Defendants allow users to create accounts without providing any type of identity verification, and they do *not* require a child user to provide any type of attestation of parental knowledge or consent when establishing an account, no matter how young the user is per the birthdate provided to Defendants in the account creation process.

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<sup>71</sup> Nat’l Ctr. on Sexual Exploitation, *supra* note 65.

<sup>72</sup> *Id.*

82. This approach creates the minimal amount of friction for allowing a child to create an account, leading to Defendants being able to amass as many child users as possible. However, it also enables children to create accounts without parental knowledge, consent, or oversight. It also enables predators to create deceptive accounts—since no age or identity verification is required—and to do so as many times as they wish.

83. An example of this problem—and of Defendants’ disinterest in addressing it proactively—can be found in headlines as recent as a few weeks ago. Shortly after the assassination of Charlie Kirk at Utah Valley University, Charlie Kirk “assassination simulator[s]” began popping up on Roblox, allowing children as young as five years old to access animated bloody depictions of the September 10 shooting.<sup>73</sup> This is despite the fact that **more than five years ago**, in January 2020, researchers reported being able to easily locate numerous re-creations and simulators based on the 2019 Christchurch mass shooting on Roblox, which killed more than 50 people.<sup>74</sup> In response, a Roblox representative hollowly declared, “We do not tolerate racism, discriminatory speech, or content related to tragic events. We have a stringent safety and monitoring system that is continuously active and that we rigorously and proactively enforce.”<sup>75</sup>

84. Defendants could easily—but opt not to—require users to verify their age and their parents’ consent by virtually any mechanism, including merely asking for these data. Doing so would create at least some restriction on the content available to users under 18 years old. Moreover, it would be at least a step towards preventing predators from easily mispresenting their

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<sup>73</sup> Susan Ferrechio, *Children’s gaming site Roblox under scrutiny over disturbing Kirk ‘assassination simulator’*, Washington Times (Sept. 18, 2025), <https://www.washingtontimes.com/news/2025/sep/18/childrens-gaming-site-roblox-scrutiny-disturbing-kirk-assassination/> (last visited Oct. 3, 2025).

<sup>74</sup> Russell Brandom, *Roblox is struggling to moderate re-creations of mass shootings*, The Verge (Aug. 17, 2021), <https://www.theverge.com/2021/8/17/22628624/roblox-moderation-trust-and-safety-terrorist-content-christchurch> (last visited Oct. 3, 2025).

<sup>75</sup> *Id.*

age, which is often their approach in targeting and grooming children. As one father told the press, “There is nothing to stop adults going on there and pretending they’re kids.”<sup>76</sup>

85. Former employees revealed that Defendants considered requiring verifiable consent, but ultimately resisted its implementation out of fear that such requirements might drive users away. Specifically, employees made a presentation to management about why parental approval would enhance safety, but “it didn’t even get to the experiment phase and was disapproved.”<sup>77</sup> 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.<sup>78</sup>

*ii. Defective parental controls that are entirely unavailable unless the parent is associated with the child’s account*

86. While Roblox has parental controls, as shown above, they are not even able to be utilized unless a parent is associated with a child’s account.<sup>79</sup> Moreover, as discussed herein, even if parents *were* to learn about their children’s Roblox accounts, and *were* to attempt to utilize the controls in place, it would be impossible to adequately monitor—let alone police—a child’s activity on the Roblox platform.<sup>80</sup>

87. Thus, this feature is rendered pointless and ineffective when parents are not even made aware their children are playing the app. Roblox’s current practices deprive parents from

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<sup>76</sup> Carl Stroud, *Horrible Dad Found Sick Messages from Paedo Predator in His Eight-Year Old Son’s Roblox iPad Game*, The Sun (Feb. 15, 2017), <https://www.thesun.co.uk/news/2872376/horrified-dad-found-sick-messages-from-paedo-predator-in-his-eight-year-old-sons-roblox-ipad-game/> (last visited Oct. 3, 2025).

<sup>77</sup> Hindenburg, *supra* note 55.

<sup>78</sup> 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> (last visited Oct. 3, 2025).

<sup>79</sup> Paragraph 55 & Fig. 12, *supra*.

<sup>80</sup> See, e.g., Tan, *supra* note 51; Margo, *supra* note 53.

enabling these features because a child can download, sign up and play the app without notice, knowledge, or consent of her parent.

88. Moreover, prior to November 2024, the “parental controls” were even *more* onerous and ineffective. As Defendants concede, it was only as of November 2024—roughly two decades after the launch of Roblox—that parents could even utilize the controls on any device other than that of their child. This means that in order to avail themselves of exercising any agency via Defendants’ “parental controls” for a period of almost 20 years, the parent would be required to (1) know about the Roblox account in the first instance and (2) have the foresight to access Roblox *through their child’s own device* in order to have any modicum of control over what their child did—or was exposed to—on the Roblox platform.<sup>81</sup>

*iii. Ineffective Chat Filters*

89. Roblox’s chat filtering feature is supposedly designed to filter inappropriate content and personal information on accounts aged 12 and younger but is less restrictive for accounts aged 13 and above. Regardless, to the extent that any filters are applied, under any circumstances, they consistently have been—and remain—inadequate.

90. In 2024, a Chilean man was able to circumvent Defendants’ chat filters in order to lure his 13-year-old victim to other platforms.<sup>82</sup> While publicly Roblox declares such outcomes are proof of the effectiveness of their chat filters, in reality this pattern demonstrates the opposite: That Roblox’s efforts to keep children on-platform routinely fail despite Defendants’ repeated public assertions and supposed effectiveness of their safety features.

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<sup>81</sup> Matt Kaufman, *Major Updates to Our Safety Systems and Parental Controls*, Roblox Corp. (Nov. 18, 2024), <https://corp.roblox.com/newsroom/2024/11/major-updates-to-our-safety-systems-and-parental-controls> (last visited Oct. 3, 2025).

<sup>82</sup> Toohey, *supra* note 67.

91. Roblox developer forums are awash in concerns voiced by the very game developers Roblox relies on for a significant portion of its revenue. These developers point out that by simply inserting “<” between the letters of a chat or using certain fonts (made available by Roblox), messages can easily slip by the filters.<sup>83</sup> Other developers note that by using “letter emojis” (again, provided by Roblox) instead of letters, content can sail easily through Roblox’s filters.<sup>84</sup> These developers describe this as “a serious problem” and many seem to wonder why Roblox has failed to fix these issues.

92. For a terrifying and real-world example of what can happen when messaging filters are ineffective, the Commonwealth would point to the now-shuttered platform Omegle, which was a chat website that operated from 2009 to 2023. Omegle allowed users, including children, to engage in anonymous chats with strangers. Despite efforts to monitor for mature and sexual content, the website became infamous for exposing minors to explicit material, predators, and exploitation. In November 2023, 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.”<sup>85</sup> And he thanked one survivor for “opening my eyes to the human cost of Omegle.”<sup>86</sup>

93. Roblox’s approach to chat contrasts sharply with other gaming services like Nintendo, which use preprogrammed dialogue options to tightly control user interactions.<sup>87</sup> By

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<sup>83</sup> *Uh, Roblox? Theres a way to 100% PERFECTLY bypass the chat filter. Something needs to be done*, DevForum, <https://devforum.roblox.com/t/uh-roblox-theres-a-way-to-100-perfectly-bypass-the-chat-filter-something-needs-to-be-done/3370284/5> (last updated Mar. 15, 2025) (last visited Oct. 3, 2025).

<sup>84</sup> *Chatfilter bypass method*, DevForum, <https://devforum.roblox.com/t/chatfilter-bypass-method/3094582> (last updated Aug. 19, 2024) (last visited Oct. 3, 2025).

<sup>85</sup> Elizabeth Napolitano, *Omegle Shuts Down Online Chat Service Amid Legal Challenges*, CBS News (Nov. 9, 2023), <https://www.cbsnews.com/news/omegle-shut-down-chat-service-legal-challenges-lawsuits/?ftag=YHF5b93lb> (last visited Oct. 3, 2025).

<sup>86</sup> Joe Tidy, *Omegle: ‘How I Got the Dangerous Chat Site Closed Down’*, BBC (Nov. 22, 2023), <https://www.bbc.com/news/technology-67485561> (last visited Oct. 3, 2025).

<sup>87</sup> Carville & D’Anastasio, *supra* note 66.

adopting a similar approach, Defendants could have significantly reduced—if not eliminated—the grooming and child abuse facilitated by Roblox because predators would not have been able to solicit any personal information or send any coercive or sexually suggestive messages.

94. Defendants further endanger children with a voice call feature, called Roblox Connect, which was introduced in November 2023. This virtual call feature allows users to have a conversation through their avatars in real time. Concerns were immediately raised about Roblox Connect, with one user emphasizing, “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.”<sup>88</sup>

*iv. Failure to prohibit bad actors from establishing multiple accounts*

95. Although Defendants know that predators routinely operate multiple Roblox accounts at the same time, the company chooses not to implement basic safety measures to prevent offenders from continuing to use the platform even after one of their many accounts gets banned.

96. Most glaringly, as discussed above, the lack of any kind of identity authentication at sign-up allows a single individual to create as many accounts as he or she wishes, at whatever age he or she wishes. Thus, if a predator is identified and banned by Roblox, nothing prevents that person from immediately re-joining the platform with a different account.

97. In April 2025, a popular YouTube personality known as Schlep (described in more detail below) publicly identified a Roblox experience called Dollhouse Roleplay, describing it on the surface to be “an innocent game with voice chat and a little dollhouse.”<sup>89</sup> However, Schlep

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<sup>88</sup> 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/> (last visited Oct. 3, 2025).

<sup>89</sup> X post by @RealSchlep (Apr. 22, 2025), <https://x.com/RealSchlep/status/1914714640824623262> (last visited Oct. 3, 2025).

claimed that “a sextortion group” called 764 “has hijacked it and actively uses the space to groom minors.”<sup>90</sup> According to Schlep, 764 users reference “CP [online shorthand for child pornography and] CNC (which stands for “consensual non-consent,” essentially rape play) and other disturbing themes.”<sup>91</sup>

98. A year earlier, in March 2024, tech publication Wired published an article about 764, describing them an international sextortion ring that is ideologically associated with Satanism and which promotes the spread of CSAM.<sup>92</sup>



Fig. 17 – Image from the Wired Article Titled “There Are Dark Corners of the Internet. Then There’s 764,” Showing Screenshot of 764-Themed Roblox Avatars, Including One That Bears the Slogan “I Love CP.”<sup>93</sup>

<sup>90</sup> *Id.*

<sup>91</sup> *Id.*

<sup>92</sup> Ali Winston, *There Are Dark Corners of the Internet. Then There’s 764*, Wired (Mar. 13, 2024), <https://www.wired.com/story/764-com-child-predator-network/> (last visited Oct. 3, 2025).

<sup>93</sup> *Id.*

99. As late as two months prior to the filing of this action, user forums on Reddit have been posting about the resurgence of the Dollhouse Roleplay game. In a post titled “They already put it back, this is disgusting,” the poster provides a screenshot of the experience, available on the Roblox platform:

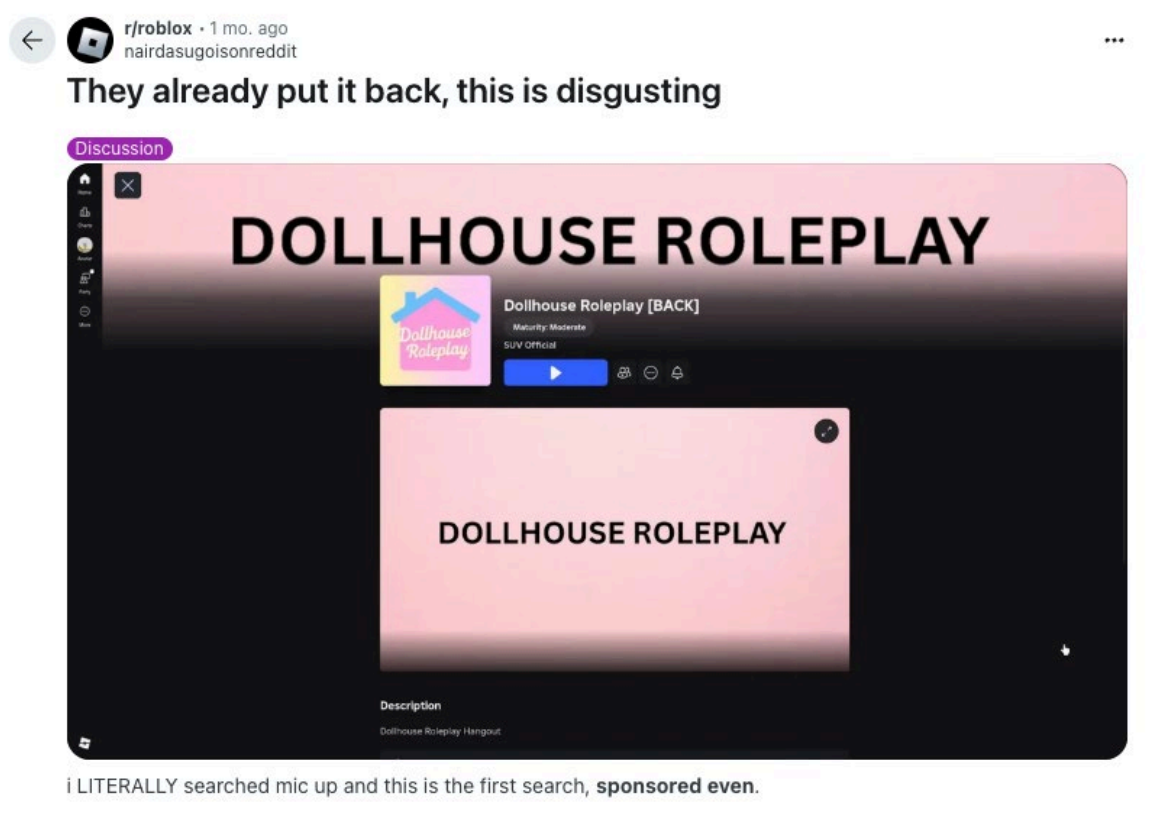


Fig. 18 – Screenshot of Dollhouse Roleplay Experience<sup>94</sup>

100. In point of fact, not only does Roblox have a problem keeping known predators off of the platform, it goes so far as to punish individuals who *identify* predators to the public. In the several months preceding this action, Defendants caused a massive controversy by sending a cease-and-desist letter to Schlep, the same YouTube personality that had identified the Dollhouse

<sup>94</sup> r/roblox, Reddit (Aug. 2025), [https://www.reddit.com/r/roblox/comments/1ms21ku/they\\_already\\_put\\_it\\_back\\_this\\_is\\_disgusting/](https://www.reddit.com/r/roblox/comments/1ms21ku/they_already_put_it_back_this_is_disgusting/) (last visited Oct. 3, 2025).

Roleplay game as a haven for 764 in April. Schlep, who has publicly worked to expose and confront potential sex offenders on Roblox through his YouTube channel, was unceremoniously banned from the Roblox platform.<sup>95</sup> As explained in a Rolling Stone article detailing the scandal:

With the help of a team of collaborators, he poses as underage “decoys” in virtual Roblox environments, responds to adult users who contact him, lets them make incriminating statements unprompted, then arranges real-world meetups where the individual in question is detained by law enforcement. He claims he has secured the arrest of six people over more than a year of pursuing what he calls “catches,” with only one arrest not leading to prosecution. Two more cases are likely headed toward plea agreements, he says, though none of the alleged predators have yet to be convicted.

...

Schlep tells Rolling Stone that it has always been his intention to work with Roblox to make the platform safer, but that the company has been a “brick wall” when he seeks to open up areas of cooperation. “I’ve made it clear since the beginning,” he says. “After one of my first catches, I was like, ‘Hey, I want to work with you. I was a victim of the platform. This is why I do it. And I would love some form of communication where I can just directly report these people to you, because their reports just don’t work.’ I have lost total faith in their moderation and report system. A lot of victims don’t have every chat log. They don’t have every voice call recorded. We have everything. We record the chat logs on mobile and scroll through them for the cops, and we give that to Roblox, too. It’s enough for the cops where they’re willing to charge and prosecute these people, but it’s not enough for Roblox to take action on their platform.”<sup>96</sup>

101. In August 2025, Schlep received a cease-and-desist notice from Defendants, informing him that his account would be closed for violations to ensnare predators. In the wake of Defendants’ response, a viral #FreeSchlep campaign has taken over social media—as well as

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<sup>95</sup> Miles Klee, *Roblox Banned a Creator for ‘Hunting’ Pedophiles – And Critics are Pissed*, Rolling Stone (Aug. 25, 2025), <https://www.rollingstone.com/culture/culture-features/roblox-schlep-pedophile-vigilante-lawsuits-1235414218/> (last visited Oct. 3, 2025).

<sup>96</sup> *Id.*

Roblox, itself—and prominent figures ranging from United States congressional representatives to Chris Hansen (the host of *To Catch a Predator*) have sought to meet with Schlep and to conduct their own investigations into Defendants’ inadequate—and, indeed, obfuscatory—approach to child safety.<sup>97</sup>

*v. Predators’ Use of Robux as an Enticement for Their Victims*

102. Defendants’ virtual currency system exposes vulnerable children to sexual exploitation and abuse by predators who trade or extort Robux in exchange for explicit photos from children.

103. One recent incident (reported in August 2025) involved a 10-year-old girl who was manipulated into sending sexually explicit images in return for Defendants’ virtual currency.<sup>98</sup>

104. The software company Bark, which specializes in child safety, provides a warning about this tactic on its website, cautioning that parents should guard against, *inter alia*, their children “[r]eceiving gifts, codes, or Robux from ‘friends.’ Offers of digital items may seem innocent, but predators often use them as a form of control or grooming.”<sup>99</sup>

105. Defendants knowingly and/or recklessly permit predators to offer children Robux in exchange for explicit photos, or demand Robux to avoid publicly releasing previously provided explicit photos. This directly ties Defendants’ profits to the sexual exploitation of children and to the exchange of CSAM. Defendants’ deceptive gaming service, manipulative reward systems, and social dynamics, are intentionally designed to exploit children’s developmental vulnerabilities, creating psychological pressures that predators weaponize for extortion.

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<sup>97</sup> *Id.*

<sup>98</sup> Jordan Kudisch, *Online predator used Robux to lure 10-year-old, lawsuit says*, NY1 (Aug. 22, 2025), <https://ny1.com/nyc/trending-topics/news/2025/08/22/robux-lawsuit-north-carolina> (last visited Oct. 3, 2025).

<sup>99</sup> The Bark Team, *The Dark Side of Gaming: How Predators Target Kids on Platforms like Roblox*, Bark.us (May 14, 2025), [https://www.bark.us/blog/roblox-safety/?srsltid=AfmBOoo3uwY6R\\_pPgyn-fuEdJ4YEtQJi2ZcI2ToUBj3qthlxWWBPXF](https://www.bark.us/blog/roblox-safety/?srsltid=AfmBOoo3uwY6R_pPgyn-fuEdJ4YEtQJi2ZcI2ToUBj3qthlxWWBPXF) (last visited Oct. 3, 2025).

106. Despite full awareness that Robux are being used to facilitate the generation of unlawful CSAM, Defendants do not warn children or parents. Instead, Defendants directly profit financially from the purchase of Robux, by predators and by their victims, for use in various schemes involving the generation and distribution of CSAM as well as the attendant exploitation and assault.

*vi. Lack of Warning Labels*

107. Another easy-to-implement feature that would improve safety on the platform is the addition of pop-up safety notices within chats and games to warn users about their behavior or the dangerous behavior of others. But Defendants' executives also rejected this change.<sup>100</sup>

108. This failure also manifests in Defendant's inadequate age-based content labels for games and other experiences. Simply because an experience is labeled for an intended audience means nothing without proactive confirmation as to the accuracy of that label. For example, the Dollhouse Roleplay experience described above appeared to be innocent on its face, and the harmful conduct—that is, exposure to 764, an international Satanist cult that is devoted to the sexual exploitation of children—occurred due to in-game player interactions within the otherwise innocuous-looking experience.<sup>101</sup> This demonstrates that mere labeling of the game (currently “Minimal,” “Mild,” “Moderate,” or “Restricted” on Defendants' platform) is ineffective, but an in-the-moment warning might deter dangerous interactions (at minimum, it would be *some* affirmative action that Defendants would be taking to stop the harm occurring).

*vii. Weak Moderation*

109. Defendants intentionally and/or knowingly have ineffective safeguards in place, allowing games/experiences that have been removed to be reuploaded almost immediately from a

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<sup>100</sup> Carville & D'Anastasio, *supra* note 66.

<sup>101</sup> @RealSchlep, *supra* note 86; Winston, *supra* note 89.

new account, perpetuating the cycle of explicit and harmful content. External groups have capitalized on Defendants' weak moderation by guiding predators to these reuploaded games, with Fast Company easily identifying 150 Discord groups dedicated to exploiting Defendants' lack of enforcement.<sup>102</sup>

110. Defendants employ an inadequate number of human moderators to analyze and manage content on the Roblox platform. With only about 3,000 moderators, Defendants' commitment 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.<sup>103</sup> Defendants attempt to justify this disparity by claiming "[y]ou really can't judge the quality of these moderation systems by the number of people."<sup>104</sup> But the reality tells a different story. Defendants' 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.<sup>105</sup>

111. Even the safety data that Defendants tout is flawed and only underscores the growing dangers created by Roblox. For example, Defendants proudly point to a 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. Defendants claim that they account for less than .04% of reports made to NCMEC. *But this data is entirely self-reported* and therefore is nothing more than evidence of

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<sup>102</sup> Helm, *supra* note 3.

<sup>103</sup> Carville & D'Anastasio, *supra* note 66.

<sup>104</sup> 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> (last visited Oct. 3, 2025).

<sup>105</sup> Carville & D'Anastasio, *supra* note 66.

Defendants' indifference to their legal obligations to monitor and report child endangerment on the Roblox platform.

112. And Defendants' self-reported data to NCMEC, flawed and limited as it is, still reveals a disturbing trend: Defendants' reports about suspected child sexual exploitation have surged nearly twenty-fold over recent years, from 675 reports in 2019 to 13,316 reports in 2023.<sup>106</sup>

113. Defendants also boast that just "0.0063% of [their] total content was flagged as violating" policies.<sup>107</sup> But like with the NCMEC data, Defendants control the systems responsible for identifying and flagging violative content.<sup>108</sup> These lower percentages are thus a reflection not of safety, but of Defendants' efforts to minimize the appearance of problems through their own inadequate reporting and enforcement mechanisms. By hiding behind self-serving metrics and refusing to take meaningful action, Defendants have fostered an environment where children are subjected to irreparable harm while the company continues to reap financial rewards.

#### **IV. The Platform Features Challenged Herein Are Not Third-Party Content, But Rather Are Content-Agnostic, First-Party Conduct Designed and Implemented by Defendants.**

114. While the games and other "experiences" described herein are developed by third parties, Defendants have complete control over the Roblox platform, which hosts the games/experiences and provides the exclusive in-game currency on which the entire ecosystem operates. Indeed, the games themselves could not and would not exist without the Roblox platform as a host. The tools used by these developers are ones that Defendants design, control, and make

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<sup>106</sup> 2019 CyberTipline Reports by Electronic Services Providers (ESP) at 4, Nat'l Ctr. for Missing & Exploited Children (2020), <https://www.missingkids.org/content/dam/missingkids/pdfs/2019-reports-by-esp.pdf> (last visited Oct. 3, 2025); 2023 CyberTipline Reports by Electronic Services Providers (ESP) at 6, Nat'l Ctr. for Missing & Exploited Children (2024), <https://www.missingkids.org/content/dam/missingkids/pdfs/2023-reports-by-esp.pdf> (last visited Oct. 3, 2025).

<sup>107</sup> Vikki Blake, *Roblox Reported Over 13,000 incidents to the National Center for Missing and Exploited Children in 2023*, GamesIndustry.biz (July 23, 2024), <https://www.gamesindustry.biz/roblox-reported-over-13000-incidents-to-the-national-center-for-missing-and-exploited-children-in-2023> (last visited Oct. 3, 2025).

<sup>108</sup> *Id.*

available to these third parties. Defendants' tools, which include scripting capabilities, 3D modeling systems, the Robux system, and other software, supply the infrastructure needed to create content for Roblox and for developers to make money creating that content.

115. This also means that the Roblox platform, itself, is critical to establishing the guardrails for any of the games that third parties create and upload. Defendants do not only establish the community guidelines for what is and is not supposed to happen on the platform—they also have built the infrastructure that allows the games to be played in the first place. In this instance—to use a 20<sup>th</sup>-century analogy—a game on Roblox is akin to a compact disc, and the Roblox platform is the compact disc player. The compact disc may be manufactured by a third party, but it only can be played under circumstances under the complete control of the manufacturer of the player. The player, itself, is agnostic as to the songs on a given CD, but any given CD, itself, can only be played in accordance with the technical specifications set forth by the player's manufacturer.

116. Defendants have control over the manner in which the Roblox platform's tools are used and have the ability to place limitations and restrictions on them. Instead, however, Defendants have chosen to prioritize growth and profit while providing grossly insufficient safety controls and safeguards. The results are deplorable.

117. Defendants' control over the Roblox platform, and the way in which it allows children to engage with the games it hosts, includes but is not limited to: warnings associated with the games, age verification of users, age restrictions for each game, policies and rules regarding inappropriate conduct exhibited within each game, monitoring for inappropriate conduct, and handling and facilitation of reports of complaints by users, among others.

**V. Roblox Is and Has Been Aware of the Dangers to Children on Its Platform.**

118. For years, Defendants have admitted to their shareholders and regulators that they have “faced allegations that our Platform has been used by criminal offenders to identify and communicate with children and to possibly entice them to interact off-Platform.”<sup>109</sup> Three years later, Defendants were still reporting these exact same issues in SEC filings, indicating a clear lack of focus on solving these issues.<sup>110</sup>

119. Defendants’ own developers even admit that Roblox is unsafe for children.<sup>111</sup> Online forum discussion posts are replete with developers writing that they would not allow their own children to use the platform, citing pervasive issues with Defendants’ child safety policies. Many of these posts highlight the platform’s systemic failures and suggest straightforward changes Defendants could implement to create a safer environment but have consistently ignored, for example:

- a) “Unfortunately, it is worse now due to Roblox’s moderation being so abysmal and Roblox being a far more widespread platform. Creeps flock aplenty when before the creep:kid ratio was much much lower ... Roblox has no interest in actually fixing the issues so long as the bad press doesn’t end up viral.”<sup>112</sup>
- b) “No. Roblox is not safe for children. The amount of NSFW [Not Safe for Work] I see on this platform on a daily basis is unbelievable.”<sup>113</sup>

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<sup>109</sup> Roblox Corp., 2021 *Q3 2021 Form 10-Q (Quarterly Report)* at 58, (Nov. 9, 2021), <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ad69fbb0-a7b7-465b-942f-53206ff42303.pdf> (last visited Oct. 3, 2025).

<sup>110</sup> Roblox Corporation, Q2 2024 Form 10-Q at 57, U.S. SEC, (Aug. 2, 2024), <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/785cb7e2-c792-470e-9ff1-021a0bbdf077.pdf> (last visited Oct. 3, 2025).

<sup>111</sup> Edwin Dorsey, *Problems at Roblox (RBLX) #5*, The Bear Cave (Oct. 17, 2024), <https://thebearcave.substack.com/p/problems-at-roblox-rblx-5> (last visited Oct. 3, 2025).

<sup>112</sup> *Id.* (quoting a whistleblower document shared with the publisher containing a "thread where Roblox game developers and employees talk about the platform's safety").

<sup>113</sup> *Id.* (quoting whistleblower document).

c) “I believe they need to automatically rate these games for older audiences, if not, you know, removing them entirely. I could keep going on about this issue, but it’s just beating a dead horse at this point.”<sup>114</sup>

d) “Roblox got banned for bad moderation; Turkey banned it to ‘protect children,’ and they are not wrong. The number 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.”<sup>115</sup>

120. These statements, coming from individuals familiar with Defendants’ operations, paint a picture of an environment rife with neglect, where harmful content flourishes, predators thrive, and Defendants repeatedly fail to act even in the face of widespread and urgent warnings.

121. As noted throughout this Complaint, Defendants are routinely confronted with the reality of the depth and breadth of harm on the Roblox platform. They just elect to ignore that harm.

## **VI. Roblox Prioritizes Profits Over Safety**

122. The reason that Defendants’ platform is overrun with harmful content and predators is simple: Defendants prioritize user growth, revenue, and profits over child safety.

123. In 2021, riding the explosive growth in users generated by the pandemic and the pandemic-driven enthusiasm for technology stocks, Defendants went public at a valuation of \$41 billion, which brought new pressures. To satisfy the scrutiny and demands of investors, Defendants, 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

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<sup>114</sup> *Id.* (quoting whistleblower document).

<sup>115</sup> *Id.* (quoting whistleblower document).

app—on the theory that profitability would follow once the business achieved sufficient scale and operating costs decreased as a percentage of revenue.

124. In pursuit of growth, Defendants deprioritized safety measures. For instance, Defendants’ executives rejected employee proposals for parental approval requirements that would protect children on the platform. Employees also reported feeling explicit pressure to avoid any changes that could reduce platform engagement, even when those changes would protect children from predators.<sup>116</sup>

125. 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 your metrics. It’s hurting the [daily] active users, the time spent on the platform, and in a lot of cases, the leadership doesn’t want that.”<sup>117</sup> 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.”<sup>118</sup>

126. By limiting safety measures, Defendants not only increased their 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 Defendants’ stock performance.

127. During earnings calls for investors, Defendants frequently address questions from analysts about how trust and safety expenditures will evolve over time. Defendants’ answers reveal that the company is hyper-focused on reducing its trust and safety expenses as a percentage of its

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<sup>116</sup> Hindenburg, *supra* note 55.

<sup>117</sup> *Id.* (alteration in original).

<sup>118</sup> *Id.*

revenue, showing that the company is not investing as much proportionally in trust and safety as the company continues to grow and attract millions of additional users.

128. For example, on Defendants' 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.<sup>119</sup> In response, Mike Guthrie, Defendants' 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* ... like you said, it's about 11% now. Ultimately, with higher efficiency, more use of artificial intelligence, we see that as a high single-digit number over the next few years."<sup>120</sup> He added, "we still think there's more to do there."<sup>121</sup>

129. At other times, Guthrie has reassured investors stating, "look for trust and safety [costs] to scale below linear as we grow"<sup>122</sup> and that Defendants were "quite happy with" trust and safety costs growing "at a lower rate than our bookings growth."<sup>123</sup>

130. Similarly, in the second quarter of 2024, CEO Baszucki highlighted that, "[i]mportantly, our infra and trust and safety expenditures were 8% lower year-on-year."<sup>124</sup>

131. Defendants are fully aware that grossly inappropriate, sexually explicit, and dangerous experiences pervade Roblox, and they allow these experiences to continue to exist

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<sup>119</sup> Roblox Corp., *FQ4 2023 Earnings Call* at 14, S&P Global (Feb. 7, 2024), [https://s27.q4cdn.com/984876518/files/doc\\_financials/2023/q4/Q4-and-Full-Year-2023-Transcript.pdf](https://s27.q4cdn.com/984876518/files/doc_financials/2023/q4/Q4-and-Full-Year-2023-Transcript.pdf) (last visited Oct. 3, 2025).

<sup>120</sup> *Id.* (emphasis added)

<sup>121</sup> *Id.*

<sup>122</sup> Roblox Corp., *FQ4 2022 Earnings Call* at 11, S&P Global (Feb. 15, 2023), [https://s27.q4cdn.com/984876518/files/doc\\_financials/2022/q4/Roblox-Q4-and-Full-Year-2022-Financial-Results.pdf](https://s27.q4cdn.com/984876518/files/doc_financials/2022/q4/Roblox-Q4-and-Full-Year-2022-Financial-Results.pdf) (last visited Oct. 3, 2025).

<sup>123</sup> Roblox Corp., *FQ3 2023 Earnings Call* at 5, S&P Global (Nov. 8, 2023), [https://s27.q4cdn.com/984876518/files/doc\\_financials/2023/q3/Q3-Earnings-Transcript.pdf](https://s27.q4cdn.com/984876518/files/doc_financials/2023/q3/Q3-Earnings-Transcript.pdf) (last visited Oct. 3, 2025).

<sup>124</sup> Roblox Corp., *FQ2 2024 Earnings Call* at 4, S&P Global (Aug. 1, 2024), [https://s27.q4cdn.com/984876518/files/doc\\_financials/2024/q2/RBLX-Q2-2024-Transcript.pdf](https://s27.q4cdn.com/984876518/files/doc_financials/2024/q2/RBLX-Q2-2024-Transcript.pdf) (last visited Oct. 3, 2025).

unchecked, despite the ability to control and/or eliminate these experiences. Leaked internal Roblox documents reveal that Defendants not only actively monitored this type of content, but also 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.<sup>125</sup>

**VII. Roblox Misled—and Continues to Mislead—Parents, Guardians, and the General Public as to the Extent of Dangers Facing Children on the Roblox Platform.**

132. Defendants’ success and continued growth hinged on constant assurances to parents that Roblox is safe for children.<sup>126</sup> Defendants have done so throughout their history and in every forum possible—on the Roblox website, through public promises of their highest executives, in news articles, on podcasts, and on and on.

133. However, these assurances cannot be squared with the reality of the dangers to children that are present on Roblox. These are dangers that Defendants not only knew about, but actively tolerated in order not to disturb growth and profit.

134. Accordingly, Defendants have made myriad affirmative representations—spanning almost two decades—as to the level of safety on the Roblox platform and the amount of priority and deference that Roblox gives to ensuring child safety on the platform. These representations are belied by the facts, however, and were meant to assuage—falsely—parents’ concerns over very real problems concerning risks of their children being preyed upon.

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<sup>125</sup> Joseph Cox & Emanuel Maiberg, *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/> (last visited Oct. 3, 2025).

<sup>126</sup> Kerry Breen, *Experts warn about explicit content on popular gaming platform Roblox*, Today.com (Oct. 20, 2021), <https://www.today.com/parents/roblox-experts-users-warn-about-inappropriate-content-t235027> (last visited Oct. 3, 2025).

135. In the same vein, Defendants kept from public knowledge the full extent of the harms posed to children on the Roblox platform. These omissions were intentional, and if the general public (particularly parents and guardians) knew the information that Defendants kept to themselves, many fewer children would be allowed on the platform.

#### **A. Roblox’s Misrepresentations and Omissions**

136. Over the years, Defendants have repeatedly represented that Roblox is safe for children and have misrepresented the safety controls they have in place. As early as 2007, the Roblox website assured parents that Roblox is an “online virtual playground ... where kids of all ages can safely interact, create, have fun, and learn.”<sup>127</sup>

137. In 2009, a blogger wrote about blocking Roblox because he doubted its safety for his children. CEO David Baszucki responded to the blogger reassuring him that Defendants flag “obviously offensive content” and remove it, and if “something is marginal, but gets flagged as inappropriate,” Roblox “investigate[s] immediately.”<sup>128</sup>

138. From 2008 to 2016, the Roblox 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.”<sup>129</sup>

139. Defendants also assured parents that they have a zero-tolerance policy for “swearing and obscenities, messages and content of a sexual or violent nature, and any sort of

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<sup>127</sup> *Frequently Asked Questions (FAQs)*, Roblox, <https://web.archive.org/web/20071105104643/http://www.roblox.com/Parents/FAQs.aspx> (archived Nov. 5, 2007) (last visited Oct. 3, 2025).

<sup>128</sup> Eric Frenchman, *Revisiting Roblox*, Pardon My French, <https://web.archive.org/web/20250911134411/https://pardonmyfrench.typepad.com/pardonmyfrench/2009/10/revisiting-roblox.html> (archived Oct. 5, 2009) (last visited Oct. 3, 2025).

<sup>129</sup> *Keeping Kids Safe*, Roblox, <https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx> (archived May 1, 2008) (last visited Sept. 7, 2025); *see also Information for Parents*, Roblox, <https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents> (archived Jan. 31, 2016) (last visited Oct. 3, 2025).

aggressive or threatening communication,” and “immediately suspended or permanently expelled” any offenders, which was not accurate.<sup>130</sup>

140. In a **2013** *Wired* interview, when asked whether a parent should be concerned about whom his child was chatting with in-game, 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.<sup>131</sup>

141. 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.”<sup>132</sup>

142. Defendants similarly have advertised Roblox as “a safe, moderated place to meet, play, chat, and collaborate on creative projects.”<sup>133</sup>

143. In **2018**, Tami Bhaumik, Defendants’ current Vice President of Civility & Partnerships, told the *Washington Post* that Roblox “focus[es] on making sure that everything is done in a safe and appropriate way.”<sup>134</sup> That year, she also claimed to another newspaper that

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<sup>130</sup> *Keeping Kids Safe*, Roblox, <https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx> (archived May 1, 2008) (last visited Oct. 3, 2025); *Information for Parents*, Roblox, <https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents> (archived Jan. 31, 2016) (last visited Oct. 3, 2025) (under “Keeping Kids Safe” tab).

<sup>131</sup> Tony Sims, *Interview with David Baszucki, Founder & CEO of Roblox*, *Wired* (Feb. 7, 2013), <https://www.wired.com/2013/02/roblox/> (last visited Oct. 3, 2025); *Keeping Kids Safe*, Roblox, <https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx> (archived May 1, 2008) (last visited Oct. 3, 2025).

<sup>132</sup> *Parent’s Guide*, Roblox, <https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/>, (archived July 16, 2017) (last visited Oct. 3, 2025).

<sup>133</sup> *Id.*

<sup>134</sup> Hayley Tsukayama, *Roblox, an Online Kids Game, Explains How a Hack Allowed a Character’s Virtual ‘Rape’*, *Wash. Post.* (July 17, 2018), <https://www.washingtonpost.com/technology/2018/07/17/roblox-an-online-kids-game-explains-how-hack-allowed-characters-virtual-rape/> (last visited Oct. 3, 2025).

Defendants’ “safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate.”<sup>135</sup> 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.”<sup>136</sup>

144. In **2019**, while presenting on a “Digital Civility Panel,” Bhaumik emphasized that Roblox “make[s] sure that we keep our environment safe” ,” citing Defendant’s “tremendous reporting system” and “incredible moderation and [child safety] team that reacts very, very quickly.”<sup>137</sup> On that same panel, and in contradiction to Defendants’ representation that they 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 our company.”<sup>138</sup> She added later, “It’s still very, very early days for us. This whole digital civility focus for Roblox is still there, we’re just still establishing it.”<sup>139</sup>

145. In a **2022** video interview about safety on Roblox, Bhaumik asserted that Defendants’ “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.”<sup>140</sup> That year, on a podcast, she also bragged about Defendants’ purported safety protections, including “thousands of human moderators on the front lines” and “machine learning that constantly is taking a look at chat

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<sup>135</sup> Chris Pollard, *Danger to Kids 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/> (last visited Oct. 3, 2025).

<sup>136</sup> *Id.*

<sup>137</sup> Thoughtworks, *Digital Civility Panel* at 00:10:44–00:10:55, YouTube (Oct. 23, 2019), <https://www.youtube.com/watch?v=XoUs1Js7WG0> (last visited Oct. 3, 2025).

<sup>138</sup> *Id.* at 00:45:17–00:45:29.

<sup>139</sup> *Id.* at 00:47:15–00:47:28.

<sup>140</sup> Bedford County Sheriff’s Office VA, Roblox: How to help kids use it SAFELY Roblox’s VP of Digital Civility & Partnerships Tami Bhaumik tells us the #1 way parents can help their kids stay safe on their platform in this brief video! at 00:00:43 –00:00:49, 00:03:06–00:03:10, Facebook (Feb. 3, 2022), <https://www.facebook.com/bedford.sheriff/videos/roblox-how-to-help-kids-use-itsafelyroblox-vp-of-digital-civility-partnerships/1338989609901259/> (last visited Oct. 3, 2025).

filters.”<sup>141</sup> 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.”<sup>142</sup> However, these statements do not reflect reality.

146. Again in **2023**, Defendants assured parents that they “continually develop cutting-edge technologies to ensure that the Roblox platform remains a safe and fun space for players all over the world.”<sup>143</sup> Defendants 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.”<sup>144</sup> Defendants emphasized that they were “committed to ensuring that Roblox is a safe and fun place for everyone.”<sup>145</sup> According to Defendants, Roblox “goes above and beyond to foster an environment where people of any age can create, play, learn, and imagine safely. We’ve kept children’s privacy and safety top-of-mind when designing our platform, especially through the implementation of advanced text filters that block inappropriate language or other unsafe content.”<sup>146</sup>

147. As recently as **2024**, Ms. 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.”<sup>147</sup>

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<sup>141</sup> Into the Metaverse, *EP.21: Tami Bhaumik (Roblox) - Building a Safe & Resilient Metaverse* at 00:36:35–00:37:08, YouTube (Sept. 13, 2022), [https://www.youtube.com/watch?v=LT5\\_bBOYS9A](https://www.youtube.com/watch?v=LT5_bBOYS9A) (last visited Oct. 3, 2025).

<sup>142</sup> *Id.*

<sup>143</sup> *For Parents*, Roblox, <https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/> (archived Apr. 5, 2023) (last visited Oct. 3, 2025).

<sup>144</sup> *Id.*

<sup>145</sup> *Roblox FAQ*, Roblox, <https://web.archive.org/web/20230328011957/https://corporate.roblox.com/faq/> (archived Mar. 28, 2023) (last visited Oct. 3, 2025) (under sub-heading “What can I do to keep my child’s Roblox account more secure?”).

<sup>146</sup> Roblox, *Roblox & User Data FAQ*, <https://en.help.roblox.com/hc/en-us/articles/4406238486676-Roblox-User-Data-FAQ> (last visited Oct. 3, 2025).

<sup>147</sup> Maressa Brown, *Is Roblox Safe for Kids? Here’s What the Experts Have to Say*, *Parents Magazine* (Apr. 29, 2024), <https://web.archive.org/web/20240617223841/https://www.parents.com/kids/safety/internet/is-roblox-safe-for-kids/> (last visited Oct. 3, 2025).

148. Similarly, in an April **2024** blog post on Defendants’ website, Roblox Chief Safety Officer, Matt Kaufman, touted Defendants’ “track record of putting the safety of the youngest and most vulnerable people on our platform first.”<sup>148</sup> Three months later, Mr. 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.”<sup>149</sup> According to Kaufman, “For users under 13, our filters block sharing of personal information and attempts to take conversations off Roblox, where safety standards and moderation are less stringent.”<sup>150</sup> A few months later, he added, “Safety is and always has been foundational to everything we do at Roblox.”<sup>151</sup>

149. Attempting to deflect attention from serious safety failures, Mr. Kaufman recently told NPR, “I think sometimes we’re losing sight of the tens of millions of people where Roblox is an incredibly enriching part of their life.”<sup>152</sup> And while Mr. Kaufman publicly claims that “any time anything happens to a child that puts them at risk is one too many,”<sup>153</sup> Defendants simultaneously admitted to investors that they were “unable to prevent all such [inappropriate] interactions from taking place.”<sup>154</sup> 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 Defendants’ strategy of prioritizing

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<sup>148</sup> Matt Kaufman, *Scaling Safety and Civility on Roblox*, Roblox (Apr. 4, 2024), <https://corp.roblox.com/newsroom/2024/04/scaling-safety-civility-roblox> (last visited Oct. 3, 2025).

<sup>149</sup> Matt Kaufman, *Driving Civility and Safety for All Users*, Roblox (July 22, 2024), <https://corp.roblox.com/newsroom/2024/07/driving-civility-and-safety-for-all-users> (last visited Oct. 3, 2025).

<sup>150</sup> *Id.*

<sup>151</sup> Matt Kaufman, *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> (last visited Oct. 3, 2025).

<sup>152</sup> Tong & Mastromarino, *supra* note 101.

<sup>153</sup> *Id.*

<sup>154</sup> Roblox Corp., *S-1 (Securities Registration Statement)* at 24, U.S. SEC (Nov. 19, 2020), <https://www.sec.gov/Archives/edgar/data/1315098/000119312520298230/d87104ds1.htm> (last visited Oct. 3, 2025).

public relations through hollow and misleading public statements over a fundamental duty to protect children.

150. According to the current website, Defendants “won’t allow language that is used to harass, discriminate, incite violence, or threaten others, or used in a sexual context.”<sup>155</sup> Roblox touts a “stringent safety system and policies,” which includes its “expertly trained team with thousands of members dedicated to protecting our users and monitoring 24/7 for inappropriate content”; its “safety review of every uploaded image, audio, and video file, using a combination of review by a large team of human moderators and machine detection before these assets become available on our platform”; and its chat filters for inappropriate content, which “are even stricter” for children under 13 and “include any potentially identifiable personal information, slang etc.”<sup>156</sup>

151. As recently as July of this year, CEO Baszucki reiterated many of these plainly-disprovable statements in a nationally televised interview. When asked point-blank how big of a pedophile problem Roblox has, Mr. Baszucki dodged the question, claiming that “since day one safety’s really been our top priority, and we’ve been innovating since day one on safety and civility.”<sup>157</sup> When asked what he would say to a parent who chooses not to have their child on Roblox out of concerns over inappropriate communications with a pedophile, Mr. Baszucki dodged again, responding that “on Roblox since day one we’ve filtered all of the communication.”<sup>158</sup> When asked about NCMEC and Bloomberg reporting on Roblox, Mr. Baszucki reiterated falsehoods that “safety has always been our top priority” and that the “set of

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<sup>155</sup> *Safety Features: Chat, Privacy & Filtering*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering> (last visited Oct. 3, 2025).

<sup>156</sup> *Safety & Civility at Roblox*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox> (last visited Oct. 3, 2025).

<sup>157</sup> Morning Joe, *Roblox CEO lobbies Congress on child safety as platform faces scrutiny: ‘Safety is our top priority’* at 00:01:40–00:01:47, MSNBC (July 25, 2025), <https://www.msnbc.com/morning-joe/watch/roblox-ceo-lobbies-congress-on-child-safety-as-platform-faces-scrutiny-safety-is-our-top-priority-243701829644> (last visited Oct. 3, 2025).

<sup>158</sup> *Id.* at 00:02:39–00:02:43.

technology we’ve been using since day one is very extensive.”<sup>159</sup> In attempting to paint Roblox as a safer alternative to other social media sites, Mr. Baszucki claimed (incorrectly) that Roblox does not allow the sharing of personal information like phone numbers, even though such sharing is rampant and Roblox’s filters are easily defeated.<sup>160</sup>

152. Missing from the above statements are warnings about dangers like the 764 organization devoted to the sexual exploitation and self-harm of children, whose experiences Roblox has trouble permanently banning; the fact that Roblox’s chat filters can be easily overcome using simple and well-known tactics; that even experiences rated for all ages can contain unmoderated, graphically sexual content and can involve the exchange of personal contact information; or that Defendants ban users from the Roblox platform when they attempt to call out sexual predators. These, of course, are just a few of the dangers facing *children*—often not even 10 years old—on Roblox. It is unacceptable for Defendants to attempt to hide these problems from public view, or to make *any* type of assurances to parents as to the safety of their children on Roblox, at least on such a sanitized record.

**VIII. Roblox Shows No Signs of Curtailing the Harms On Its Platform, and Instead Seeks to Implement Features and Protocols That Will Only Amplify the Danger Posed to Children.**

153. In November 2024, nearly *two decades* after Roblox first went live, Defendants announced a series of alleged improvements, including removing the ability to message others outside of experiences for under 13-year-old users;<sup>161</sup> giving parents a separate dashboard where they can monitor a child’s Roblox account; viewing the child’s friend list; setting spending control;

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<sup>159</sup> *Id.* at 00:03:50–00:04:02.

<sup>160</sup> *Id.* at 00:04:22–00:04:29.

<sup>161</sup> *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/?gad\\_source=1&gad\\_campaignid=22314562799&gbraid=0AAAAA-mwunE6xRTAieyEDFXDQAYHBkXWo&gclid=CjwKCAjw2vTFBhAuEiwAFaScwstNXUoKZPZoNisLMHBAA71qEXNSFtFzobHo1XaD4WIBY34MoAaT2RoCoIgQAvD\\_BwE](https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/?gad_source=1&gad_campaignid=22314562799&gbraid=0AAAAA-mwunE6xRTAieyEDFXDQAYHBkXWo&gclid=CjwKCAjw2vTFBhAuEiwAFaScwstNXUoKZPZoNisLMHBAA71qEXNSFtFzobHo1XaD4WIBY34MoAaT2RoCoIgQAvD_BwE) (last visited Oct. 3, 2025).

managing screen time;<sup>162</sup> preventing games from using chalkboard writings where people could get around the censoring of communications;<sup>163</sup> and implementing restrictions to stop under 13-year-old users from accessing new Roblox games that are awaiting maturity ratings.<sup>164</sup>

154. These changes could all have been implemented years ago. None of them involve any new or groundbreaking technology. Defendants only implemented these changes when Roblox's stock price was threatened.

155. Further, these changes are little more than window dressing—too little, too late. Defendants *still allow* adults to contact and message children because Defendants only banned user-to-user messaging for users under the age of 13 *outside of experiences*. Predators can still message children on public chats while playing games; indeed, Defendants have left child predators' blueprint for finding children on Roblox intact since predators have always found children by playing games they know that children will frequent.<sup>165</sup> Defendants also failed to address core issues like Roblox's lack of age verification and refusal to require parental consent to create an account. Defendants did not commit to hiring more content moderators, nor did they implement any sort of identity check to prevent registered sex offenders from making accounts. And as detailed previously, these changes did nothing to address harmful conduct which was already well underway and causing harm by the time these changes were announced.<sup>166</sup>

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<sup>162</sup> 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> (last visited Oct. 3, 2025).

<sup>163</sup> *Id.*

<sup>164</sup> *Id.*

<sup>165</sup> In an interview with BBC News, a reporter confronted Baszucki with a series of experiences that her 11-year-old son was recommended. One of these included "Late Night Boys and Girls Club RP," which had a maturity rating of "mild." In this experience, players would still be permitted to message each other in the game. Zoe Kleinman, *Gaming Empire: The Roblox Story* at 00:09:34–00:10:00, BBC News (March 17, 2025), <https://www.youtube.com/watch?v=LQztK0MCUAc> (last visited Oct. 3, 2025).

<sup>166</sup> Tan, *supra* note 51.

156. Further, just as Defendants rolled out these changes, they simultaneously introduced a new “Party” feature in an attempt to counteract any potential loss in user engagement.<sup>167</sup> Because Defendants knew that users often turned to other apps like Discord or Snapchat to communicate while playing games and because Defendants knew that their safety changes would reduce key user engagement metrics, they sought to capture that traffic (and revenue) and replace any loss of engagement with the Party feature. While the Party feature is currently only available for users aged 13 and older, such limitations are hollow without robust age verifications in place. And the fact that Defendants have stated that they are exploring making such a feature available to younger users demonstrates that, far from prioritizing safety, Defendants’ real focus is protecting their bottom line.<sup>168</sup>

157. Defendants have also engaged in a deceptive public relations campaign using ostensibly independent online safety organizations to influence the narrative around these changes. For instance, Defendants have leveraged their ties to groups like the Family Online Safety Institute (“FOSI”). An online parenting magazine favorably quoted Stephen Balkam, FOSI’s CEO, as endorsing Defendants’ new features as a win for child safety.<sup>169</sup> What the article omitted, however, is that Defendants’ own Vice President of Civility and Partnerships, Tami Bhaumik, serves as FOSI’s board chair -- an obvious conflict of interest.<sup>170</sup> This calculated relationship exposes how Defendants manipulate public perception by using seemingly independent safety organizations as mouthpieces to shape the narrative in its favor.

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<sup>167</sup> Rebecca Ruiz, *Roblox’s New Party Feature Makes Discord Obsolete*, Mashable (Dec. 2, 2024), <https://mashable.com/article/roblox-party-discord> (last visited Oct. 3, 2025).

<sup>168</sup> *Id.*

<sup>169</sup> 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> (last visited Oct. 3, 2025).

<sup>170</sup> *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/> (last visited Oct. 3, 2025).

## **CAUSES OF ACTION**

### **COUNT I: UNFAIR AND DECEPTIVE ACTS AND PRACTICES IN VIOLATION OF KENTUCKY CONSUMER PROTECTION ACT (KRS 367.110 *et. seq.*)**

158. Plaintiff repeats and realleges the preceding paragraphs of this Complaint as if fully set forth herein.

159. The KCPA prohibits “[u]nfair, false, misleading, or deceptive acts or practices in the conduct of any trade or commerce.” KRS 367.170.

160. Under KRS 367.190, “[w]henever the Attorney General has reason to believe that any person is using, has used, or is about to use any method, act or practice declared by KRS 367.170 to be unlawful, and that proceedings would be in the public interest,” he may seek injunctive relief, and further may seek (i) a civil penalty of up to \$25,000 per violation of any temporary or permanent injunction issued under KRS 367.190, and (ii) a civil penalty of up to \$2,000 per willful violation of the KCPA, KRS 367.990(1)–(2).

161. The unfair, false, misleading, and/or deceptive acts willfully committed by Defendants constitute a breach of the duties enumerated under Kentucky law, including but not limited to the KCPA.

162. At all times relevant to this Complaint, Defendants violated the KCPA by willfully engaging in unfair, false, misleading, and/or deceptive acts or practices in the Commonwealth of Kentucky. These acts or practices are unfair in that they are unconscionable, offend public policy, and are immoral, unethical, oppressive, or unscrupulous.

163. In numerous instances Defendants willfully engaged in unfair, false, misleading, and/or deceptive acts or practices in connection with the advertising, marketing, promotion, and other representations regarding their products and services, including but not limited to statements made on their own website, in their own marketing materials, to reporters, to podcasters, to online

publications, and to television cameras, including but not limited to the means described herein. Defendants made these deceptive representations and omissions, directly or indirectly, expressly or by implication, with the intent that consumers rely on the deceptive representations and omissions.

164. As set forth, *supra*, Defendants willfully failed to disclose material facts concerning the true nature of the risks of harm posed to children on Roblox.

165. As set forth, *supra*, Defendants willfully misrepresented to regulators and the public that Roblox was safe for children, and prioritized the safety of children on the platform, when in fact Defendants knew that those representations were false.

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

167. Defendants have access to information and data about the safety of their platform that is unavailable to their consumers, and Defendants do not share that information and data. This asymmetry of information has led to profound harm being visited upon Roblox users and their families.

168. For each of Defendants' willful violations of KRS 367.170, the Commonwealth is entitled to recover a civil penalty of not more than two thousand dollars (\$2,000) per violation, as well as all additional available relief, be it equitable (in the form of an injunction, declaratory, or other relief), or damages.

## COUNT II: UNJUST ENRICHMENT

169. Plaintiff repeats and realleges the preceding paragraphs of this Complaint as if fully set forth herein.

170. Plaintiff brings this Cause of Action for unjust enrichment against Defendants pursuant to its common law and/or *parens patriae* authority, as well as pursuant to the Attorney General's statutory authority to initiate litigation when in the interests of the Commonwealth per KRS 15.020(3).

171. As a direct and proximate result of the unlawful conduct described above, Defendants have been and will continue to be unjustly enriched.

172. Children and families in the Commonwealth of Kentucky have conferred a benefit on Defendants in the form of being a monetizable audience (providing not just an opportunity for Defendants to grow their user base among a coveted demographic, but also for Defendants to acquire sensitive and valuable personal data associated with children; as well as for all other reasons that Defendants has ascribed a monetary value to children).

173. Defendants have benefited from their unlawful acts, realizing billions of dollars in revenues and profits through (i) the sale of Robux to users, (ii) commissions collected from experiences created by users that are played and paid for by other users, (iii) the collection, accumulation, harvesting, use, and monetization of vast amounts of children's personal information and data, and (iv) other revenue streams yet to be uncovered through discovery.

174. It would be inequitable and not in good conscience for Defendants to retain any ill-gotten gains earned as a result of the conduct alleged herein – gains that would not exist but for the misleading and victimization of children and parents in the Commonwealth of Kentucky.

175. Defendants have retained this significant benefit despite their knowledge and understanding of the psychological, physical, financial, privacy and security harms described herein experienced by children and their families resulting from their use of Roblox.

176. Roblox users have suffered and will continue to suffer significant detriments, in the form of psychological, physical, financial, and data privacy and security harms as a result of Defendants' continued practices and representations relating to Roblox.

177. Plaintiff requests an order from the Court compelling Defendants to disgorge proceeds that they unjustly received as a result of their activities as described herein.

### **COUNT III: NEGLIGENCE**

178. Plaintiff repeats and realleges the preceding paragraphs of this Complaint as if fully set forth herein.

179. The Commonwealth brings this Cause of Action for negligence against Defendants pursuant to its common law and/or *parens patriae* authority, as well as pursuant to the Attorney General's statutory authority to initiate litigation when in the interests of the Commonwealth per KRS 15.020(3).

180. Defendants had and continues to have a duty to exercise reasonable care in designing, implementing, maintaining, and otherwise introducing Roblox into the stream of commerce.

181. This duty extends to making Roblox safe for the children in the Commonwealth of Kentucky that Roblox actively seeks out as its target audience.

182. Defendants breached that duty by willfully and deliberately designing a platform that, by design, is patently and foreseeably unsafe for children and places them in harm's way.

183. Defendants' breach of this duty has harmed Roblox users in Kentucky.

184. Consumers, especially Kentucky youth and their families, are suffering, have suffered, and will continue to suffer substantial injury as a result of Defendants' violations of the Commonwealth's consumer protection law and the common law of Kentucky. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers and harm the public interest.

#### **COUNT IV: NEGLIGENCE – FAILURE TO WARN**

185. Plaintiff repeats and realleges the preceding paragraphs of this Complaint as if fully set forth herein.

186. The Commonwealth brings this Cause of Action for negligence – failure to warn against Defendants pursuant to its common law and/or *parens patriae* authority, as well as pursuant to the Attorney General's statutory authority to initiate litigation when in the interests of the Commonwealth per KRS 15.020(3).

187. Defendants designed, created, and distributed the Roblox product, which they continue to update and distribute to consumers, including consumers in Kentucky.

188. Defendants placed Roblox in the hands of end users, including end users in Kentucky, without adequate warning regarding the non-obvious dangers inherent in those users' safe and proper use of the Roblox product or of dangers inherent to their foreseeable misuse of the product.

189. A prudent manufacturer of similar products, by the exercise of ordinary care, should have discovered and foreseen the dangers lurking within the Roblox platform. And indeed, Roblox has discovered and has actual knowledge of such dangers as described herein, and has failed to take meaningful action.

190. Defendants knew or should have known of the dangers inherent in the Roblox product and therefore had a duty to warn the public as to the dangers posed to its users, identified herein, that are present on Roblox.

191. Defendants breached that duty by, *inter alia*, (i) failing to exercise ordinary care to identify the dangers inherent in the Roblox product, and (ii) failing to provide an adequate warning to the users of the Roblox product about those dangers that Roblox knew or should have known about through the exercise of ordinary care.

192. Defendants' breach of this duty has harmed Roblox's users, including the Commonwealth's children.

193. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of Defendants' violations of the Commonwealth's consumer protection and business regulation laws (including the KCPA) and the common law of Kentucky. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers and harm the public interest.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully prays that the Court grant the following relief:

- a. Entering an Order finding that the Defendants have violated the Kentucky Consumer Protection Act, as well as the common law of Kentucky as set forth herein, and have been unjustly enriched by such, and that judgment be entered against Defendants in favor of Plaintiff;
- b. Granting Plaintiff all recoverable measures of damages allowable under the claims identified herein;

- c. Awarding Plaintiff penalties of up to \$2,000.00 per willful violation of the KCPA;
- d. Awarding Plaintiff temporary and permanent injunctive relief against Defendants' ongoing violations of the KCPA, and a penalty of up to \$25,000 per violation of that temporary and permanent injunction;
- e. Awarding Plaintiff disgorgement of all of Defendants' ill-gotten gains; and
- f. Entering an Order finding that, in accordance with the KCPA, Defendants, their affiliates, successors, transferees, assignees, and the officers, directors, partners, agents, and employees thereof, and all other persons acting or claiming to act on their behalf or in concert with them, be enjoined and restrained from, in any manner, continuing, maintaining or renewing the conduct, alleged herein in violation of the above stated Kentucky laws, or from entering into any other contract, conspiracy having a similar purpose or effect;
- g. Allowing Plaintiff to recover the costs and expenses of suit, pre- and post-judgment interest, and reasonable attorneys' fees as provided by law; and
- h. Ordering such other and further relief as the Court deems just, necessary, and appropriate.

RESPECTFULLY SUBMITTED, this the 6<sup>th</sup> day of October, 2025.

**RUSSELL COLEMAN**

Attorney General  
Commonwealth of Kentucky

/s/ J. Christian Lewis

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