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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF SAN FRANCISCO**

14 REBECCA DALLAS, individually and as
15 successor-in-interest to ETHAN
16 DALLAS,

17 Plaintiff,

18 v.

19 ROBLOX CORPORATION; DISCORD
20 INC.; and DOES 1-50, inclusive,

21 Defendants.

Case No.:

COMPLAINT

- (1) Fraudulent Concealment and Misrepresentation
- (2) Negligent Misrepresentation
- (3) Negligence – General
- (4) Negligence – Failure to Warn
- (5) Negligence – Unreasonable Design
- (6) Negligent Undertaking
- (7) Strict Liability – Design Defect
- (8) Strict Liability – Failure to Warn
- (9) Wrongful Death
- (10) Survival Action

JURY TRIAL DEMANDED

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1 Plaintiff Rebecca Dallas (“Plaintiff”), individually and as successor-in-interest to Ethan
2 Dallas, brings this action against Roblox Corporation (“Roblox”), Discord Inc. (“Discord”), and
3 Does 1-50 (collectively, “Defendants”) to recover damages arising from the severe injuries caused
4 by Defendants’ respective conduct in creating, designing, marketing, and distributing their mobile-
5 and web-based applications (“apps”), and alleges as follows:

6 **I. INTRODUCTION**

7 1. This action seeks to hold Roblox and Discord accountable for recklessly and
8 deceptively operating their businesses in a way that led to the sexual exploitation and suicide of
9 Plaintiff’s son, Ethan Dallas (“Ethan”). The heinous acts against Ethan were committed by a
10 dangerous child predator whose actions were possible only because of the egregiously tortious
11 conduct of Defendants.

12 2. Through their pervasive patterns of misrepresentations about safety, Defendants
13 portray their apps as safe and appropriate places for children to play. In reality, and as Defendants
14 well know, the design of their apps makes children easy prey for pedophiles, and Defendants had
15 no appropriate safeguards to ensure that children were in fact safe or that predators were screened.
16 There are steps that Defendants could have taken to protect children and to make their apps safer.
17 But time and again Defendants refused to invest in basic safety features to protect against exactly
18 the kind of exploitation that Ethan suffered.

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

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

1 4. Ethan was one of those children. Ethan was an avid user of Roblox who relied
2 heavily on the app for social interaction, making him a prime target for the countless child predators
3 that Roblox knew were freely roaming the app looking for vulnerable children. Ethan was targeted
4 on Roblox by a serial predator who engaged in textbook grooming behavior that Roblox has known
5 about for years. The predator posed as another child, initially engaging in innocent conversations
6 but gradually escalating to sexual topics and sexual exchanges.

7 5. The predator was then able to use the app to transition their interactions to Discord,
8 where he escalated his predation to an even more disturbing level, convincing Ethan to send
9 sexually explicit images of himself and increasingly demanding explicit photographs and videos.
10 The predator's tactics included threats to post or share humiliating images and other intimidation
11 tactics designed to instill fear in Ethan. Under fear of exposure, humiliation, and threats of violence,
12 Ethan complied with these demands, believing his actions were compelled by the predator's threats
13 and control.

14 6. Tragically, Ethan was permanently harmed and haunted by these experiences, and
15 he died by suicide at the age of 15.

16 7. Ethan suffered this sexual exploitation and died by suicide as the result of
17 Defendants' conduct. For years, Defendants have misrepresented and deliberately concealed
18 information about the pervasive predatory conduct that their apps enable and facilitate. Had
19 Defendants disclosed the truth of what was really occurring on their apps, Plaintiff would never
20 have permitted Ethan to use these apps. Had Defendants taken any steps to screen users before
21 allowing them on the apps, Ethan would not have been exposed to the large number of predators
22 trolling the platforms. Had Defendants implemented even the most basic systems of age and
23 identity verification, as well as other commonsense safety measures, Ethan would have never
24 interacted with this predator, never suffered the harm that he did, and never died by suicide.

25 8. Ethan suffered unimaginable harm. His innocence was snatched from him forever.
26 Tragically, what happened to him is far from an isolated event. Indeed, Ethan is just one of
27 countless children whose lives have been devastated as a result of Defendants' gross negligence
28 and defectively designed apps. This action, therefore, is not just a battle to vindicate Plaintiff and

1 Ethan’s rights—it is a stand against Defendants’ systemic failures to protect society’s most
2 vulnerable from unthinkable harm in pursuit of financial gain over child safety.

3 **II. PARTIES**

4 **A. Plaintiff**

5 9. Plaintiff Rebecca Dallas is a citizen and resident of the State of California, with a
6 principal place of residence in San Diego County.

7 10. Plaintiff has suffered profound and enduring harm as a result of the death of her
8 minor son Ethan Dallas. She has suffered the loss of Ethan’s love, companionship, comfort,
9 affection, moral support, and future financial contributions, as well as the loss of household services
10 he would have provided. This harm is severe, ongoing, and permanent, profoundly affecting
11 Plaintiff’s emotional well-being and quality of life.

12 11. As successor-in-interest to Ethan’s estate, Plaintiff also seeks all damages that Ethan
13 would have been entitled to recover had he survived. This includes, but is not limited to, damages
14 for pre-death pain, suffering, and disfigurement, medical expenses incurred prior to death, and lost
15 future earnings or earning capacity. Plaintiff further alleges that Defendants’ conduct was
16 malicious, oppressive, or fraudulent, entitling the estate to punitive damages pursuant to California
17 Civil Code § 3294. The harm suffered by Ethan before his death was substantial, and Plaintiff seeks
18 to hold Defendants accountable for those injuries through his survival action.

19 12. Ethan never entered any contract with Defendants. To the extent Defendants claim
20 that Ethan attempted to accept an electronic terms and conditions clause by clicking buttons on a
21 screen that included language that he did not read or understand, such an assertion is legally
22 erroneous, invalid, and unenforceable, including because Plaintiff disaffirms any contract that
23 Ethan may have entered, including any forced arbitration agreement and any delegation clause in
24 any contract, and because Ethan lacked the capacity to enter any contract, including any forced
25 arbitration agreement and any delegation clause in any contract.

26 **B. Defendants**

27 13. Defendant Roblox Corporation is a Delaware corporation with its principal place
28 of business in San Mateo, California. Roblox owns, operates, controls, produces, designs,

1 maintains, manages, develops, tests, labels, markets, advertises, promotes, supplies, and
2 distributes the Roblox app. Roblox is widely available to consumers throughout the United
3 States.

4 14. Defendant Discord Inc. is a Delaware corporation with its principal place of
5 business in San Francisco, California. Discord owns, operates, controls, produces, designs,
6 maintains, manages, develops, tests, labels, markets, advertises, promotes, supplies, and
7 distributes the Discord app. Discord is widely available to consumers throughout the United
8 States.

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

15 **III. JURISDICTION AND VENUE**

16 16. This Court has personal jurisdiction over Defendants because their principal places
17 of business are in California, and because they have contacts with California that are so continuous
18 and systematic that they are essentially at home in this State. Defendant Roblox maintains its
19 principal place of business in the County of San Mateo. Defendant Discord maintains its principal
20 place of business in the County of San Francisco.

21 17. Venue is proper in this Court because this Complaint seeks damages arising and
22 resulting from the acts and omissions of Defendant Discord that caused the injuries complained of
23 herein, and the County of San Francisco is Discord's county of residence and the location of its
24 principal place of business.

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

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

27 18. Launched in 2006, Roblox is an online gaming app that allows users to play myriad
28 games, which the company refers to as "experiences." There are currently more than 40 million

1 experiences within the Roblox ecosystem. Most experiences on Roblox are created not by Roblox
2 but by individuals (often Roblox users) or companies that develop their own games and make them
3 available on Roblox for others to play.

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

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

13 21. Roblox designed its app for children. Roblox has marketed its app not only as the
14 “#1 gaming site for kids and teens”⁴ but also as an educational experience for young users. Roblox
15 claims that it provides “new gateways into learning”—from “chemistry to physics to robotics and
16 more, Roblox experiences bring concepts to life in ways that immerse learners and motivate
17 exploration, play, and deep thinking.”⁵ These offerings, according to Roblox, include “high-quality,
18 standards-aligned, immersive educational experiences designed by curriculum experts.”⁶

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

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

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

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

28 ⁶ *Id.*



Learners

Roblox is a collaborative and civil place to learn

Why learn on Roblox?

- Active learning: Engaged learners leads to better knowledge absorption and retention.
- Safe and civil: We continually work with parents and digital safety experts to ensure that learners can confidently engage in experiences and develop collaborative digital citizenship skills.
- Expert-backed: Supplement learning with immersive experiences designed by curriculum experts.

Roblox webpage – “A New Era of Engaged Learning”

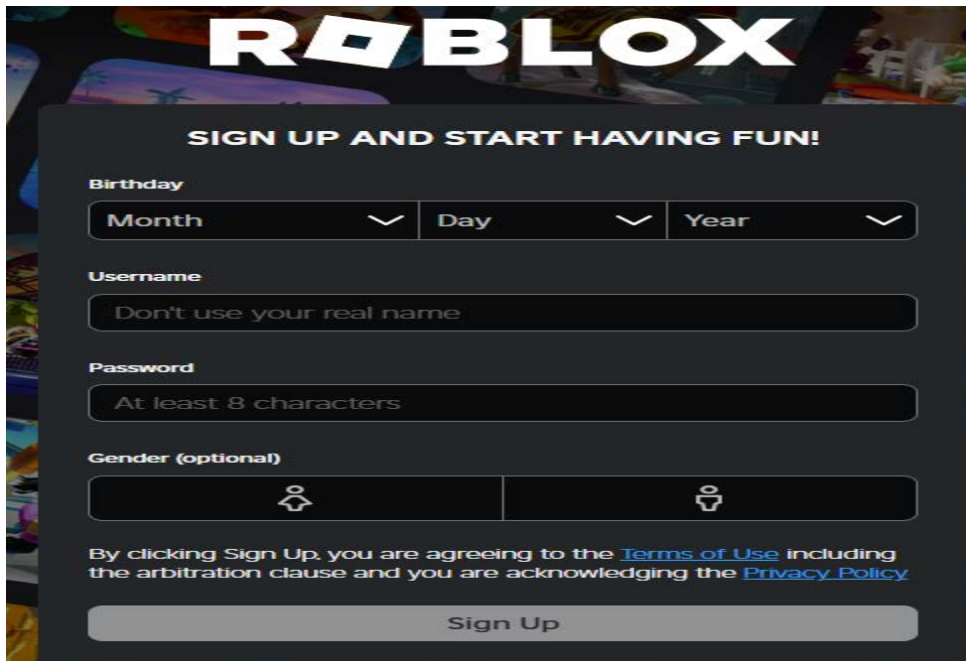
22. Roblox’s popularity among children exploded during the pandemic when the app was flooded with millions of new users as kids were confined to their homes and glued to their devices. By September 2020, roughly 30 million people, more than half of them under 13, were on Roblox daily, making it the world’s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

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

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

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

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



Roblox Sign-up Screen

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

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



Example default avatar on Roblox.

28. They can then play in millions of experiences on the app. These games are sorted into different genres/categories, such as Sports, Role-Playing Games, Fighting, First Person

1 Shooters, Fashion, Horror, Comedy, Military, and Naval. The games recommended to a user will
2 vary based on the age the user entered when generating their account and Roblox’s algorithm that
3 recommends games to the user.



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12 *Examples of games available on Roblox.*

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

17 30. Now, under Roblox’s default settings, adults cannot directly message children under
18 13, but Roblox still does nothing to prevent children this young from creating accounts with fake
19 13+ birthdates, which gives them full access to Roblox’s direct-messaging options. Roblox still
20 relies on self-reported birthdates for age verification. Further, children 13 and over are still
21 vulnerable to receiving friend requests—or direct messages within Roblox experiences—from adult
22 strangers. There is also nothing that prohibits adults from entering fake birthdays and posing as
23 children in their attempts to friend or otherwise communicate with children users.

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

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

6 **B. Roblox Lures Parents into Letting Their Kids Use Roblox with Promises of**
7 **Safety.**

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

12 34. Over the years, Roblox has repeatedly represented on its website that its app is safe
13 for children and has touted the safety controls it has in place. As early as 2007, Roblox’s website
14 assured parents that Roblox is an “online virtual playground . . . where kids of all ages can safely
15 interact, create, have fun, and learn.”⁹

16 35. From 2008 to 2016, the website continued to promise parents, “We take every
17 precaution possible to make sure kids are protected from inappropriate and offensive individuals as
18 well as from indecent and distasteful content.”¹⁰ It also assured parents that Roblox had a zero-
19 tolerance policy for “swearing and obscenities, messages and content of a sexual or violent nature,
20 and any sort of aggressive or threatening communication,” and “immediately suspended or
21

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

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

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

1 Roblox claimed that the company was “dedicated to working together with parents and digital safety
2 experts to promote a family-friendly environment that allows all players to imagine, create, and play
3 online.”¹⁵ Roblox emphasized that it is “committed to ensuring that Roblox is a safe and fun place
4 for everyone.”¹⁶ According to Roblox, it “goes above and beyond to foster an environment where
5 people of any age can create, play, learn, and imagine safely. We’ve kept children’s privacy and
6 safety top-of-mind when designing our platform, especially through the implementation of advanced
7 text filters that block inappropriate language or other unsafe content.”¹⁷

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

13 39. According to the current website, Roblox “won’t allow language that is used to
14 harass, discriminate, incite violence, threaten others, or used in a sexual context.”¹⁹ Roblox touts a
15 “stringent safety system and policies,”²⁰ which include its “expertly trained team with thousands of
16 members dedicated to protecting our users and monitoring for inappropriate content”; its “safety
17 review of every uploaded image, audio, and video file, using a combination of review by a large
18 team of human moderators and machine detection before they become available on our platform”;
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21 ¹⁵ *Id.*

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

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

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

27 ¹⁹ Roblox, *Safety Features: Chat, Privacy & Filtering*, [https://en.help.roblox.com/hc/en-](https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200th)
28 [us/articles/203313120-Safety-Features-Chat-Privacy-](https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200th)
[Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200th](https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200th)
[n%20younger%20players](https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering#:~:text=Players%20have%20different%20safety%20settings,and%20phrases%2%200th) (last visited Feb. 11, 2025).

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

1 and its chat filters for inappropriate content, which “are even stricter” for children under 13 and
2 “include any potentially identifiable personal information, slang etc.”²¹

3 40. These false promises and assurances are not confined to Roblox’s website. They are
4 repeated in statements by the company’s highest executives—including in direct response to
5 concerns raised by parents.

6 41. In 2009, a blogger wrote about blocking Roblox because he doubted its safety for his
7 children. CEO David Baszucki responded to the blogger reassuring him that Roblox flags
8 “obviously offensive content” and removes it, and if “something is marginal, but gets flagged as
9 inappropriate,” Roblox “investigate[s] immediately.”²²

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

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

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

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²¹ *Id.*

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

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

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

Parents

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

45. Such statements by Bhaumik date back years. In 2018, Bhaumik told the *Washington Post* that Roblox "focus[es] on making sure that everything is done in a safe and appropriate way."²⁵ That year, she also claimed to another newspaper that Roblox's "safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate."²⁶ 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."²⁷

46. In 2019, while presenting on a "Digital Civility Panel," Bhaumik emphasized that "[w]e make sure there's a safe environment," citing Roblox's "tremendous reporting system" and "incredible moderation and CS team that reacts very, very quickly."²⁸ On that same panel—and in contradiction to Roblox's representation that it had always taken "every precaution possible" to

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

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

²⁷ *Id.*

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

1 protect children, Bhaumik conceded that “digital civility did not exist at Roblox a year and a half
2 ago and we established this and made it a movement within our company.”²⁹ She added later, “It’s
3 still very early days for us. This whole digital civility focus for Roblox is still there, we’re just still
4 establishing it.”³⁰

5 47. In a 2022 video interview about safety on Roblox, Bhaumik asserted that Roblox’s
6 “number one priority” is “to create a safe, civil, and inclusive community” and that “[s]afety and
7 civility has always been baked into everything that we do.”³¹ That year, on a podcast, she also
8 bragged about Roblox’s purported safety protections, including “thousands of human moderators
9 on the front lines” and “machine learning that is constantly taking a look at chat filters.”³² With
10 these and other measures, she exclaimed, “[a]ny sort of bad actor that comes onto the platform is
11 dealt with swiftly” and “[w]e remove any content that’s reported to us within minutes.”³³

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

15 49. In a 2024 blog post on Roblox’s website, Kaufman asserted that “Roblox has spent
16 almost two decades working to make the platform one of the safest online environments for our
17 users, particularly the youngest users. Our guiding vision is to create the safest and most civil
18 community in the world.”³⁴ According to Kaufman, “For users under 13, our filters block sharing
19 of personal information and attempts to take conversations off Roblox, where safety standards and
20 moderation are less stringent.”³⁵ A few months later, he added, “Safety is and always has been
21

22 ²⁹ *Id.*

23 ³⁰ *Id.*

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

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

27 ³³ *Id.*

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

³⁵ *Id.*

1 foundational to everything we do at Roblox.”³⁶

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

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

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

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

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

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

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

20 55. These games and virtual worlds are brought to life through developer tools that
21 Roblox designs, controls, and makes available to third parties. These tools, which include scripting
22 capabilities, 3D modeling systems, and other software supply the infrastructure needed to create

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

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

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

1 content for the Roblox platform. Roblox has the power to control the use of these tools. Instead,
2 over the years, the company has given third parties essentially unfettered access to use the tools to
3 build what they want, with no meaningful oversight or safeguards. The results are deplorable.

4 56. As early as 2010, Roblox’s virtual games had already devolved into hosting and
5 promoting sexually explicit content. Roblox’s scripting language, which allows developers to
6 manipulate avatar activity and interactions any way they want, was deployed to create scenarios
7 where avatars engaged in simulated sexual activity.³⁹

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

14 58. Roblox also hosts a staggering number of experiences centered on simulated sexual
15 activity. For instance, children can play in “condo games”—predatory digital environments,
16 including houses, where users can remove their avatars’ virtual clothing, revealing nudity, and
17 engage in disturbing simulated sexual activities with other Roblox users.⁴² They can also play
18 games like “Public Bathroom Simulator Vibe,” which allows access to users as young as nine
19 years old and enables users to simulate sexual activity in virtual bathrooms,⁴³ as well as virtual
20

21
22 ³⁹ See, e.g., YouTube, *How to Do Roblox Sex Glitch*,
23 https://www.youtube.com/watch?v=Zz97Q1SQE_k; see also YouTube, *Roblox Sex?*,
<https://www.youtube.com/watch?v=hyqCHG6nUYI>.

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

26 ⁴¹ *Id.*

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

⁴³ Hindenburg, *supra* note 1.

1 strip clubs, where child avatars perform sexually explicit acts, like giving lap dances to patrons.⁴⁴

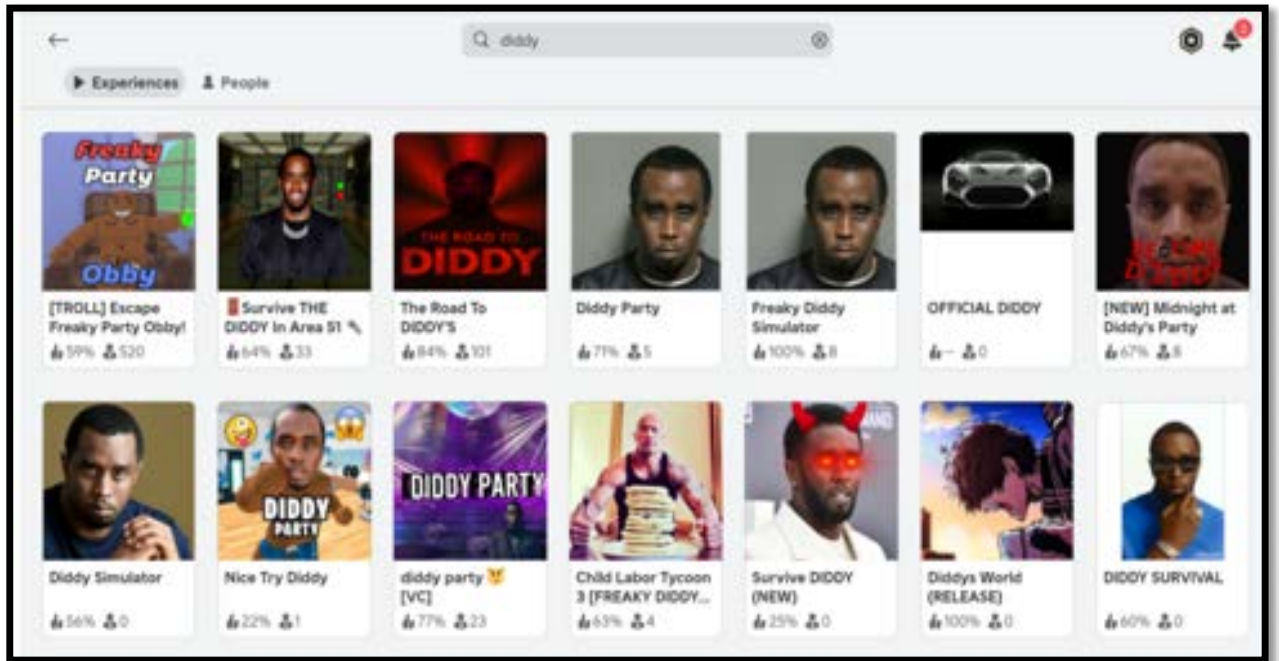


11 *Roblox's Public Bathroom Simulator Game is rated ages nine and up and*
12 *allows users to simulate sexual activity.*⁴⁵

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

27 ⁴⁴ Dickson, *supra* note 42.

28 ⁴⁵ Hindenburg Research, *supra* note 1.



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

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



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

⁴⁶ *Id.*

⁴⁷ *Id.*

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

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

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

21 64. The interactive nature of games amplifies this effect. Unlike passive media, video
22 games require players to actively participate in behaviors, including those that simulate
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25 ⁴⁸ Joseph Cox & Emanuel Malberg, *Leaked Documents Reveal How Roblox Handles Grooming*
26 *and Mass Shooting Simulators*, Vice (Aug. 1, 2022), [https://www.vice.com/en/article/leaked-](https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/)
[documents-how-roblox-moderates-content-mass-shootings-grooming/](https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/).

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

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

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

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



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

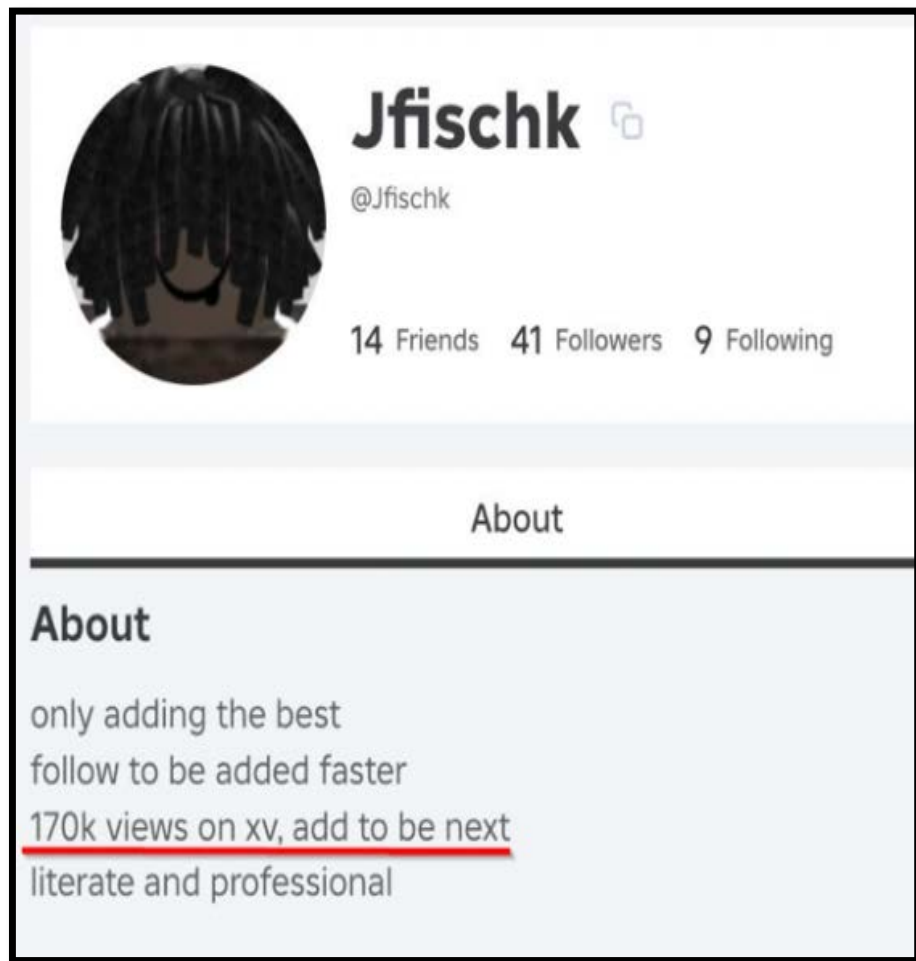
26 ⁵¹ Hindenburg Research, *supra* note 1.

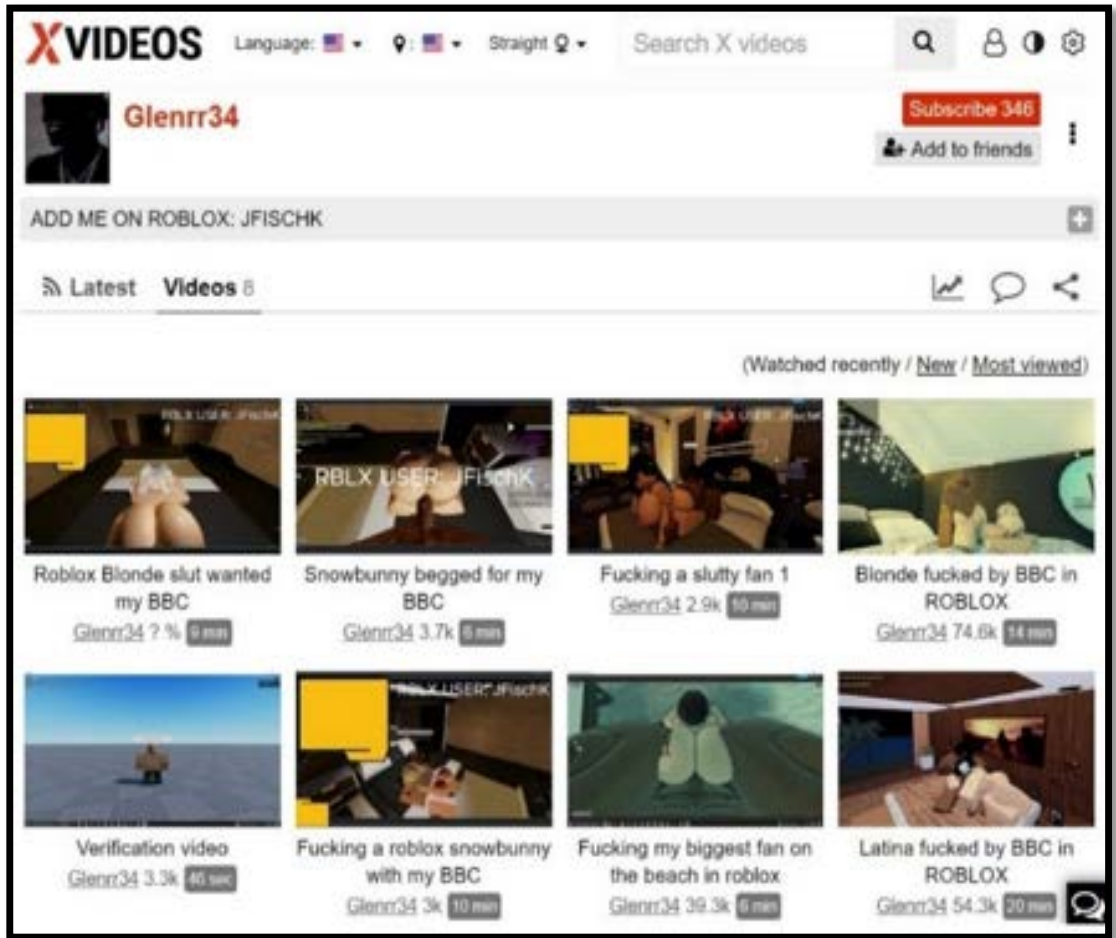
27 ⁵² *Id.*

28 ⁵³ *Id.*

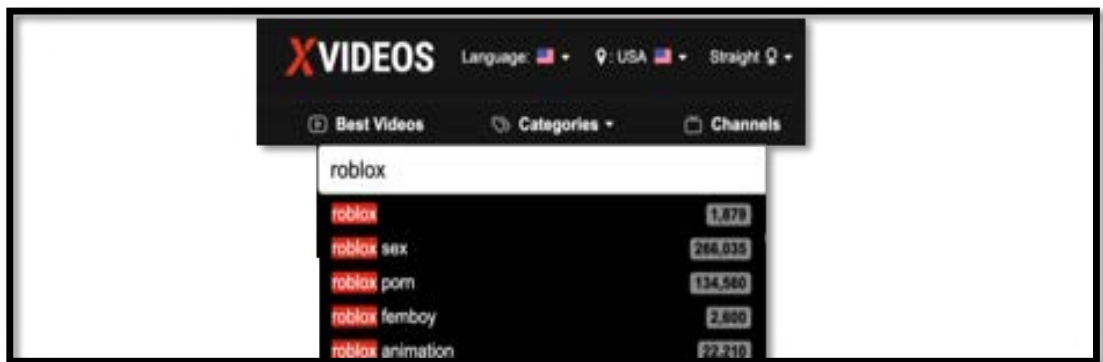
⁵⁴ *Id.*

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





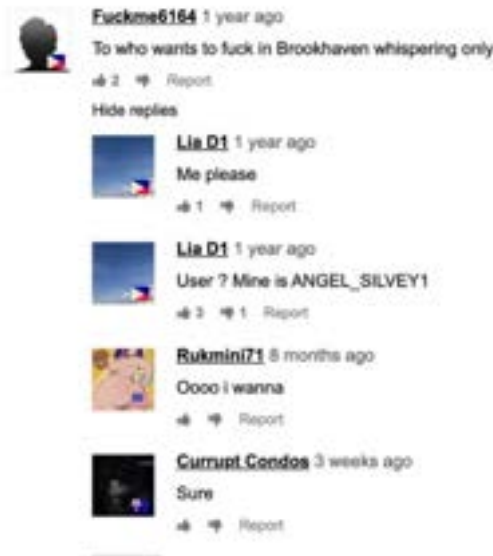
This Roblox user advertised their Roblox account on porn website, XVideos, where they had uploaded videos of their avatar having sex with other Roblox users.⁵⁵



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

⁵⁵ *Id.*

⁵⁶ *Id.*



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

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

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

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

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

⁵⁷ *Id.*

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

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

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

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

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

23 74. Despite full awareness of how its app facilitates such exploitation, Roblox continues
24 to profit from these tactics by collecting transaction fees on Robux exchanges. Its reckless
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27 ⁵⁸ Carville & D'Anastasio, *supra* note 8.

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

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

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

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

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

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

23 79. In 2018, Roblox's app enabled a predator posing as a child to coerce a nine-year-old
24 girl into performing and filming sexually abusive acts on her four-year-old brother through violent
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26 ⁶⁰ Pei-Sze Cheng, Evan Stulberger & Dave Manney, *I-Team: Popular Online Gaming Site for*
27 *Kids is Breeding Ground for Child Sex Predators, Mother Says*, NBC New York (Apr. 6, 2017),
28 <https://www.nbcnewyork.com/news/local/video-game-warning-roblox-child-sex-predator-online-site-investigation-what-to-know/87438/>.

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

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

9 81. During the pandemic, reports of child sex abuse facilitated by Roblox accelerated.
10 In 2020, for example, Roblox enabled a 47-year-old predator to pose as a teenager, target a 16-year-
11 old girl, move the conversation to Facebook, solicit explicit photos and videos, all of which
12 constituted child pornography,⁶⁵ and ultimately traffic her across state lines, raping her multiple
13 times.⁶⁶ In Michigan, a man was arrested for persuading an eight-year-old girl to send him videos
14 of herself, in various stages of undress, in exchange for Robux.⁶⁷ The perpetrator had been arrested
15 for similar offenses three years earlier and was a registered sex offender in Kansas. This perpetrator
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18 ⁶¹ Briana Barker, *Internet Safety and Your Children: How Kids are at Risk*, Record-Courier (Mar.
19 27, 2018), <https://www.record-courier.com/story/news/2018/03/27/internet-safety-your-children-how/12899346007/>.

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

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

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

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

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

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

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

5 82. 2023 was more of the same. For example, a 30-year-old man was arrested for
6 soliciting illicit photos from young victims and authorities reported that he had three separate
7 Roblox accounts.⁷⁰ A 27-year-old man was arrested for kidnapping an 11-year-old girl whom he
8 met on Roblox.⁷¹ A 23-year-old New Jersey man, who was a prominent Roblox developer with a
9 known history of exploiting children via Roblox, was sentenced to 15 years in prison for grooming
10 a 15-year-old girl, transporting her to his house, and sexually abusing her.⁷²

11 83. Similar incidents continued throughout 2024. For example, a 21-year-old Chilean
12 man was arrested for traveling to the U.S. to meet an underage girl he met on Roblox, where he
13 had “spent several months manipulating and grooming” her.⁷³ A 21-year-old in California pled
14 guilty for directing a 10-year-old girl, whom he met on Roblox, to disrobe and touch herself.⁷⁴ A
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17 ⁶⁸ Jeff Bonty, *Man Charged With Soliciting Juvenile Through Roblox*, Daily Journal (Jul. 23, 2021), <https://www.shawlocal.com/daily-journal/>.

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

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

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

25 ⁷² U.S. Dep’t of Justice, *New Jersey Man Sentenced to 15 Years in Federal Prison After Grooming
26 Minor Online and Transporting Her Across State Lines Via Uber for Sex* (Aug. 30, 2023),
[https://www.justice.gov/usao-sdin/pr/new-jersey-man-sentenced-15-years-federal-prison-after-
27 grooming-minor-online-and](https://www.justice.gov/usao-sdin/pr/new-jersey-man-sentenced-15-years-federal-prison-after-grooming-minor-online-and).

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

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

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

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

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

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

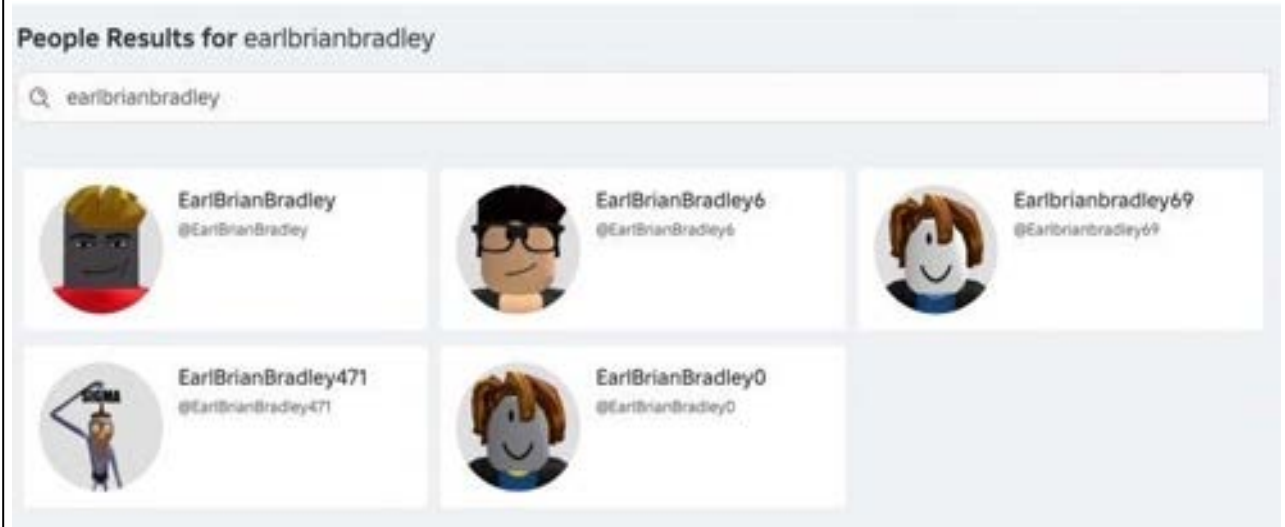
25 ⁷⁷ Martin Robinson, *Roblox Predator Who Raped 10-year-old Girl is Locked Up: Paedophile Who*
26 *‘Targeted Child He Met on Gaming Platform Is Jailed for Six Years*, Daily Mail (Jan. 17, 2025),
27 <https://www.dailymail.co.uk/news/article-14278563/Roblox-predator-raped-10-year-old-girl.html>.

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

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

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

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



13
14 *Results from an account search for “earlbrianbradley.”*⁸¹

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

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

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24
25 ⁸¹ Hindenburg Research, *supra* note 1.

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

27 ⁸³ *Id.*

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

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

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

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

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

⁸⁷ *Id.*

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

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

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

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

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

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

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

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

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

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

17 91. By limiting safety measures, Roblox not only increased its users but also reduced
18 the company’s safety expenses as a percentage of its revenue—a key metric for Wall Street, which
19 views trust and safety costs as detrimental to Roblox’s stock performance. Barclays, for example,
20

21
22 ⁸⁹ After listing on the New York Stock Exchange, Roblox CEO David Baszucki told CNBC,
23 “Roblox has been growing for 15 years That’s a long-term growth path, and we believe that
24 continues forward, even after Covid.” Ari Levy & Jessica Bursztynsky, *Roblox Jumps to \$38
25 Billion Mark Cap as Public Investors Get Their First Crack at the Popular Kids Game App*,
26 CNBC (Mar. 10, 2021), [https://www.cnbc.com/2021/03/10/roblox-rblx-starts-trading-at-
64point50-after-direct-listing.html](https://www.cnbc.com/2021/03/10/roblox-rblx-starts-trading-at-64point50-after-direct-listing.html). CFO Michael Guthrie added, “As [Covid] restrictions ease, we
expect the rates of growth in 2021 will be well below the rates in 2020, however, we believe we
will see absolute growth in most of our core metrics for the full year.” *Id.*

⁹⁰ Hindenburg Research, *supra* note 1.

⁹¹ *Id.*

⁹² *Id.*

⁹³ *Id.*

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

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

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

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

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

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

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

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

27 ⁹⁷ *Id.* (emphasis added).

28 ⁹⁸ *Id.*

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

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

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

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

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

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

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

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

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

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

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

27 ¹⁰⁶ *Id.*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

¹¹⁹ *Id.*

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

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

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

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

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

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

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

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

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

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

25 ¹²³ Hindenburg Research, *supra* note 1.

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

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

28 ¹²⁶ *Id.*

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

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

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

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

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

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

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

16 223. Similarly, while Roblox attempts to block the word “condo”—a term that, until
17 recently, was widely used to identify sexualized experiences—countless external groups on
18 platforms like Reddit and Discord are dedicated to helping users locate new explicit content on
19 Roblox. As soon as Roblox removes one game, its ineffective safeguards allow the same game to
20 be reuploaded almost immediately from a new account, perpetuating the cycle of explicit and
21 harmful content. External groups have capitalized on Roblox’s weak moderation by guiding
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25 ¹²⁹ Q1 2021 Earnings Call (May 11, 2021).

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

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

28 ¹³² *Id.*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

27 ¹⁴¹ *Id.*

28 ¹⁴² *Id.*

¹⁴³ *Id.*

¹⁴⁴ *Id.*

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

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

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

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

17 95. And these changes are little more than window dressing—too little, too late, and
18 woefully inadequate. Most fundamentally, Roblox *still allows* adults to contact and message
19 children. Roblox only banned user-to-user messaging for users under the age of 13 *outside of*
20 *games*. Predators can still message children on public chats while playing games; indeed, Roblox
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23 ¹⁴⁵ Hindenburg Research, *supra* note 1.

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

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

¹⁴⁸ *Id.*

¹⁴⁹ *Id.*

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

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

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

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

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

¹⁵² Revealing Reality, *supra* note 150.



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

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

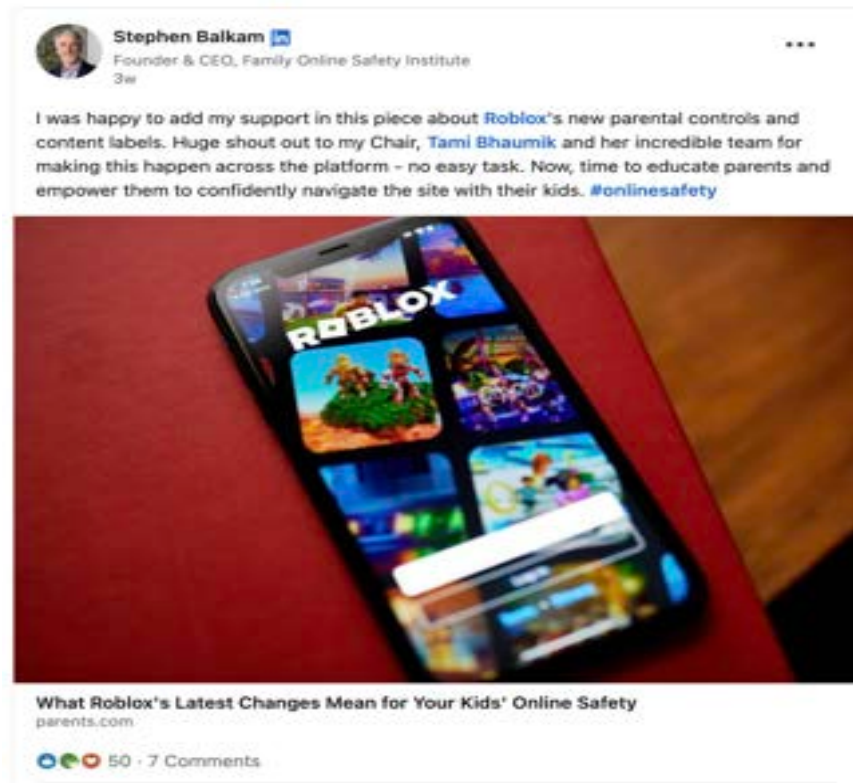
20 99. Roblox has also engaged in a deceptive public relations campaign using ostensibly
21 independent online safety organizations to influence the narrative around these changes. For
22 instance, Roblox has leveraged its ties to groups like the Family Online Safety Institute (“FOSI”).
23 An online parenting magazine favorably quoted Stephen Balkam, FOSI’s CEO, as endorsing
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26 ¹⁵³ *Id.*

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

28 ¹⁵⁵ *Id.*

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



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

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

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

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

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

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

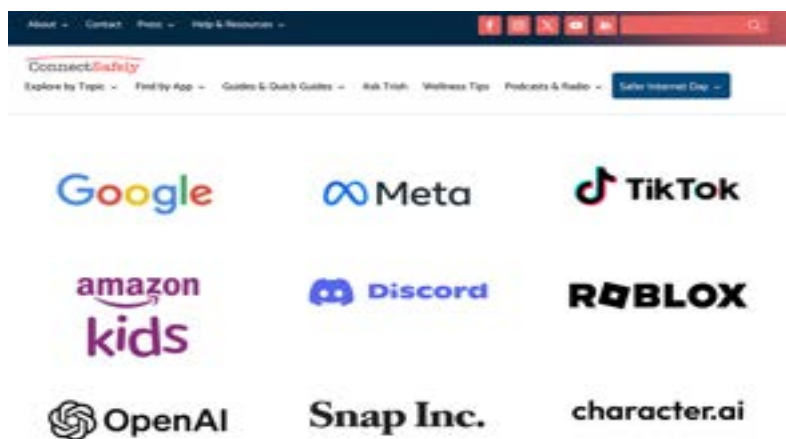
15 103. Roblox’s deceptive playbook would not be complete without a misleading public
16 relations campaign, where industry-funded safety “experts” praise Roblox’s safety update. For
17 example, Roblox’s press release announcing these updates quotes Larry Magid, the CEO of
18 ConnectSafely, as saying,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

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

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

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



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

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

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

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

28 ¹⁶⁴ *Id.*

1 **V. FACTUAL ALLEGATIONS AS TO DISCORD**

2 **A. Discord Offers a Communications App That It Markets to Children.**

3 106. Discord is a communications app that allows users to chat over voice, video, and
4 text messaging. Discord is organized into chat groups called “servers,” which are topic-based
5 virtual spaces that users can join to engage in conversations with others. Servers are organized into
6 subtopics called “channels,” which are divided into text and voice channels. In text channels, users
7 post messages, upload files, and share images. In voice channels, users communicate through voice
8 or video chat and screen share. Users can also send private messages via voice, video, or text.

9 107. Launched in 2015, Discord quickly became the top app for gamers looking to
10 communicate while playing videogames. The company’s founders shared a love of video games
11 and created a service for gamers to seamlessly communicate with each other. Discord has since
12 expanded to include a wider audience of anyone looking to communicate with others about an
13 endless array of topics. As Discord puts it, “Discord is now where the world talks, hangs out, and
14 builds relationships”—“Discord lets anyone create a space to find belonging.”¹⁶⁵

15 108. Although many users on Discord are adults, Discord directly markets its app to
16 young users. For example, Discord advertises its functionality for school clubs and offers “Student
17 Hubs,” which are “dedicated places for students on Discord that make it easy to meet classmates
18 from your own school, discover their communities on Discord, and share your servers for your
19 fellow classmates to join.”¹⁶⁶ Discord also markets to young users with features such as “custom
20 emoji, stickers, soundboard effects and more to add your personality to your voice, video or text
21 chat.”¹⁶⁷ According to Discord, these features are designed to “make your group chats more fun.”¹⁶⁸

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25 ¹⁶⁵ Discord, *Create Space for Everyone to Find Belonging*, <https://discord.com/company> (last visited Feb. 11, 2025).

26 ¹⁶⁶ Discord, *Discover Your Next Favorite Campus Club in Student Hubs* (Aug. 22, 2022), <https://discord.com/blog/discover-your-next-favorite-campus-club-in-student-hubs>.

27 ¹⁶⁷ Discord, *Create Space for Everyone to Find Belonging*, <https://discord.com/company> (last visited Feb. 11, 2025).

28 ¹⁶⁸ *Id.*



Example of a custom emoji from Discord's website.¹⁶⁹

109. In recent years, Discord has exploded in popularity among young users, driven in part by the pandemic. As The New York Times explained in its article *How Discord, Born from an Obscure Game, Became a Social Hub for Young People*, “While adults working from home flocked to Zoom, their children were downloading Discord to socialize with other young people through text and audio and video calls in groups known as servers.”¹⁷⁰ Given this influx of young people, which has only grown since the pandemic, the average age of a Discord user is 16 years old.¹⁷¹

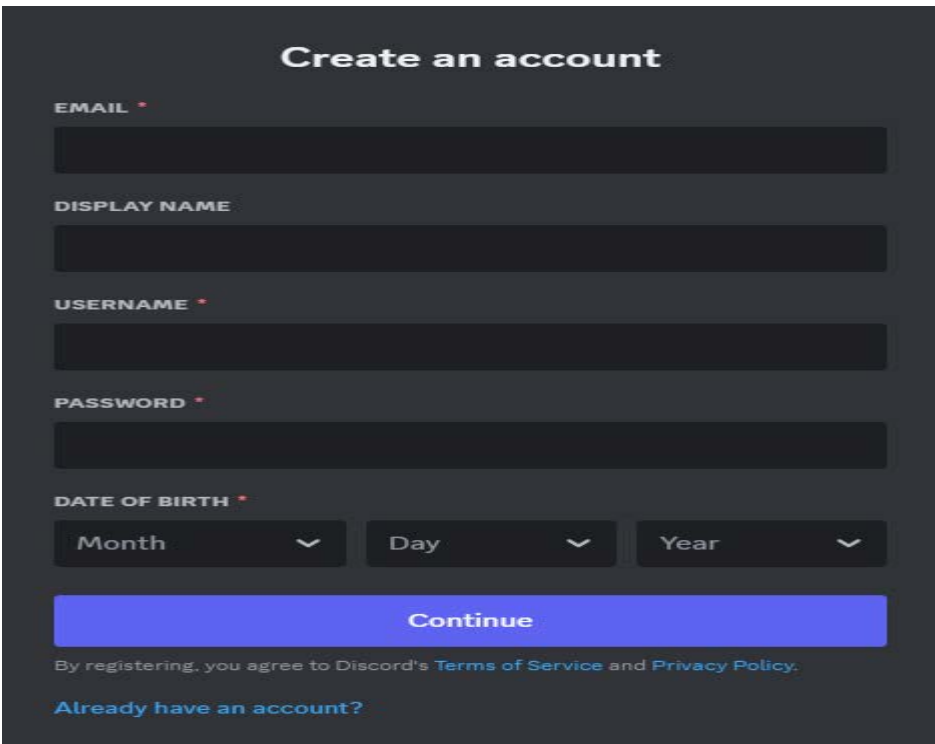
110. Creating an account on Discord is extremely easy. Users must provide only an email address, display name, username, password, and birthdate. Users can then access Discord for free on their computers, tablets, and cellular devices.

¹⁶⁹ Discord, *Custom Emojis*, https://support.discord.com/hc/en-us/articles/360036479811-Custom-Emojis#h_01H06JVDAV2VKZBTRGJDY8NBV7 (last visited Feb. 11, 2025).

¹⁷⁰ Kellen Browning, *How Discord, Born from an Obscure Game, Became a Social Hub for Young People*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

¹⁷¹ Super League, *An Introductory Look into Discord*, <https://www.superleague.com/post/an-introductory-look-into-discord>.

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Discord Sign-up Screen

111. While Discord’s Terms of Service prohibit users under 13, Discord does not verify age or identity. As a result, countless Discord users are under 13, many of whom state their real age in their bios, tell other users their real age in chats, and post pictures showing their real age. There are children as young as eight years old using Discord.¹⁷²

112. Although Discord offers certain safety features, Discord does not default to the highest safety settings upon account creation. For example, by default, all users, including those under 18, can receive direct messages from another user in the same server, allowing them to send and receive private messages from strangers. And even when parents set more restrictive settings, children can simply change those settings to whatever they desire.

113. Certain content on Discord is “age-restricted,” meaning in theory that children under 18 cannot access it. Server owners can self-designate specific channels in a server as age-restricted. For years, however, Discord did not allow server owners to self-designate entire servers as age-

¹⁷² Kellen Browning, *5 Ways Young People Are Using Discord*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-users-gen-z.html>.

1 restricted, and so minors could easily access servers with age-restricted content even if designated
2 age-restricted channels in the server were blocked. Discord only recently provided server owners
3 with the ability to self-designate entire servers as age-restricted.

4 **B. Discord Lures Parents into Letting Their Kids Use Discord with Promises of**
5 **Safety.**

6 114. Since its inception, Discord has assured parents that its app provides a safe place for
7 children to spend their time interacting with others. According to Discord, “in May 2015, Discord
8 began as a way for us to all play games together, better. And Safer.”¹⁷³ “We’ve always wanted
9 Discord to be a place where one could safely play games with friends.”¹⁷⁴

10 115. For years, Discord has promised that it has a “zero-tolerance policy” for anything
11 relating to the sexual exploitation of children. For example, in Discord’s July – September 2022
12 Transparency Report, Discord emphasized that it “has a zero-tolerance policy for anyone who
13 endangers or sexualizes children.”¹⁷⁵ Similarly, in a July 2023 website post titled “Discord’s
14 Commitment to Teen and Child Safety,” Discord assured parents that it “has a zero-tolerance policy
15 for inappropriate sexual conduct with children and grooming,” with “special attention given to
16 predatory behaviors such as online enticement and the sexual extortion of children.”¹⁷⁶

17 116. Discord promises parents that its app is different from other communication
18 products when it comes to child safety, assuring parents that “[w]e built Discord to be different and
19 work relentlessly to make it a fun and space for teens.”¹⁷⁷ “Discord is built on Safety,” and “[s]afety
20 is at the core of everything we do and a primary area of investment as a business.”¹⁷⁸

23 ¹⁷³ Discord, *Discord Safety Boost* (Mar. 28, 2017), <https://discord.com/blog/discord-safety-boost>.

24 ¹⁷⁴ *Id.*

25 ¹⁷⁵ Discord, *Discord Transparency Report: July – September 2022*,
<https://discord.com/blog/discord-transparency-report-q3-2022>.

26 ¹⁷⁶ Discord, *Discord’s Commitment to Teen and Child Safety* (July 11, 2023),
<https://discord.com/safety/commitment-to-teen-child-safety>.

27 ¹⁷⁷ *Id.*

28 ¹⁷⁸ Discord, *Discord’s Commitment to a Safe and Trusted Experience* (May 12, 2022),
<https://discord.com/safety/360043700632-discords-commitment-to-a-safe-and-trusted-experience>;
<https://discord.com/safety/commitment-to-teen-child-safety>.

1 117. Discord specifically assures parents that its app is designed to keep children safe
2 and that it defaults to safety. Discord, for instance, in a website post titled “Settling into School
3 with Discord,” informs parents that “[m]any teams across Discord work together to ensure that
4 your teen finds belonging by building products and policies with safety by default.”¹⁷⁹ And in a
5 website post titled “Discord’s Commitment to Teen and Child Safety,” Discord promises parents
6 that “[w]e make our products safe spaces by design and default. Safety is and will remain part of
7 Discord’s core experience.”¹⁸⁰

8 118. Likewise, according to Discord’s 2023 “Parent’s Guide to Discord,” “Discord has
9 default settings designed to keep minors safe, such as automatically scanning direct messages for
10 explicit images and videos.”¹⁸¹ Those default settings, according to Discord, include “Teen Safety
11 Assist,” which (1) “automatically blur[s] media that may be sensitive in direct messages and group
12 direct messages with friends, as well as in servers,” and (2) sends “safety alerts” to teen users when
13 they receive a direct message from a user for the first time.”¹⁸²

14 119. While Discord represents that its app is designed to default to safety, it
15 simultaneously instructs parents on how to *change* the default safety settings to keep their child
16 safe. For years, Discord has consistently assured parents that they can use the company’s “tools to
17 protect [their children] from inappropriate content or unwanted contact.”¹⁸³ Discord, for example,
18 tells parents they can turn on an “explicit image filter” that will “[a]utomatically block direct
19 _____

20 ¹⁷⁹ Savannah Badalich, *Settling into School with Discord*, Discord (Sept. 28, 2021),
21 <https://discord.com/safety/settling-into-school-with-discord>.

22 ¹⁸⁰ Discord, *Discord’s Commitment to a Safe and Trusted Experience* (May 12, 2022),
23 <https://discord.com/safety/360043700632-discords-commitment-to-a-safe-and-trusted-experience>;
24 <https://discord.com/safety/commitment-to-teen-child-safety>.

25 ¹⁸¹ Discord, *Parent’s Guide to Discord*,
26 [https://web.archive.org/web/20230714165101/https://connectsafely.org/wp-](https://web.archive.org/web/20230714165101/https://connectsafely.org/wp-content/uploads/2021/09/Parents-Guide-to-Discord.pdf)
27 [content/uploads/2021/09/Parents-Guide-to-Discord.pdf](https://web.archive.org/web/20230714165101/https://connectsafely.org/wp-content/uploads/2021/09/Parents-Guide-to-Discord.pdf) (archived July 14, 2023).

28 ¹⁸² Savannah Badalich, *Building a Safer Place for Teens to Hang Out*, Discord (Oct. 24, 2023),
<https://discord.com/safety/safer-place-for-teens>.

¹⁸³ Discord, *Helping Your Teen Stay Safe on Discord* (May 12, 2022),
<https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord>; Discord,
Helping Your Teen Stay Safe on Discord,
[https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord)
[your-teen-stay-safe-on-discord](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord) (archived July 11, 2023).

1 messages that may contain explicit images.”¹⁸⁴ Discord also informs parents that they can disable
2 the direct message setting that allows anyone in a server to privately message their children.
3 Discord also promises parents that they can change their child’s “Friend request settings” to limit
4 who can send them a friend request—*i.e.*, “Everyone,” Friend of friends,” or “Server members.”¹⁸⁵

5 120. Discord’s CEO and co-founder Jason Citron recently reiterated many these
6 assurances nearly verbatim in his January 31, 2024 testimony to the U.S. Senate as part of its
7 hearing on “Big Tech and the Online Child Sexual Exploitation Crisis.” Citron began his written
8 testimony “by stating clearly that Discord has a zero-tolerance policy for content or conduct that
9 endangers or sexualizes children.”¹⁸⁶ Discord, according to Citron, “has a zero-tolerance policy for
10 inappropriate sexual conduct with children, meaning inappropriate sexual contact between adults
11 and teens on the service, with special attention given to predatory behaviors such as online
12 enticement and the sexual extortion of children, commonly referred to as ‘sextortion.’”¹⁸⁷

13 121. He also emphasized Discord’s “multi-pronged approach” to child safety, including
14 the company’s “approach to product development, whereby we implement a rigorous ‘safety by
15 design’ practice when developing products.”¹⁸⁸ As Citron elaborated, “[b]ecause safety is critical
16 to our core mission, Discord takes a ‘safety by design’ approach to our work.”¹⁸⁹

17 122. Citron also highlighted Discord’s “sophisticated tools” for parents to keep their
18 children safe, as well as the company’s “features designed to keep teens safe on our platform,” such
19 as Teen Safety Assist, which flags “potentially unwanted conversations to teen users in Discord”
20 and “automatically blur[s] potentially sensitive media to teens in DMs, GMS, and in servers.”¹⁹⁰

22 ¹⁸⁴ Discord, *Helping Your Teen Stay Safe on Discord*,
23 [https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord)
24 [your-teen-stay-safe-on-discord](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord) (archived July 11, 2023).

24 ¹⁸⁵ *Id.*

25 ¹⁸⁶ Hearing Before the U.S. Senate Committee on the Judiciary, Big Tech and the Online Child
26 Exploitation Crisis, Testimony of Jason Citron, CEO and Co-Founder of Discord Inc. (Jan. 31,
2024), https://www.judiciary.senate.gov/imo/media/doc/2024-01-31_-_testimony_-_citron.pdf.

26 ¹⁸⁷ *Id.*

27 ¹⁸⁸ *Id.*

27 ¹⁸⁹ *Id.*

28 ¹⁹⁰ *Id.*

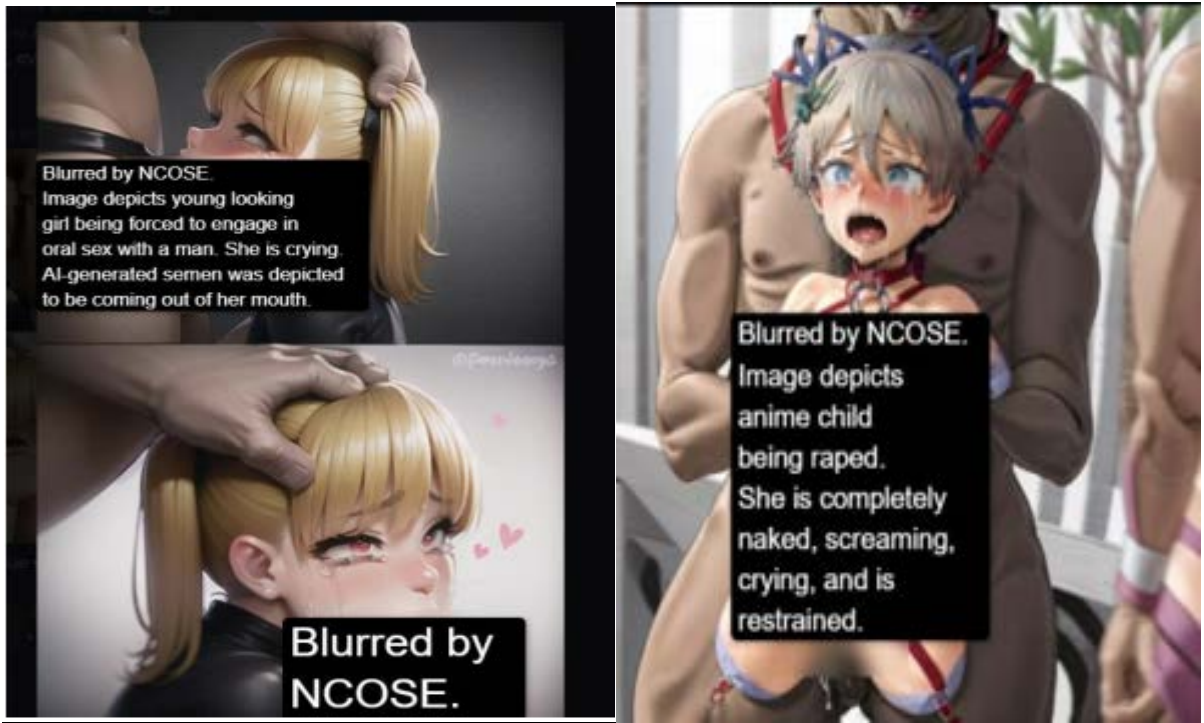
1 **C. In Reality, Discord Is a Digital and Real-life Nightmare for Children.**

2 123. Although Discord assures parents that it has zero tolerance for content or conduct
3 that endangers children and that its app is built on safety, the company, in fact, has created and
4 maintains an environment in which the sexual exploitation of children is rampant and thriving. The
5 result has been devastating, with countless children suffering irreversible harm.

6 **1. Discord hosts and promotes dangerous and illegal sexual content.**

7 155. Discord is overflowing with sexually explicit images and videos involving children,
8 including anime and child sex abuse material (“CSAM”)—*i.e.*, child pornography. Discord
9 provides access to these materials not only to adults but also to child users, creating an ecosystem
10 that facilitates pedophilia and exposes children to this unlawful content.

11 156. The content of this material is beyond disturbing. For example, numerous Discord
12 servers contain anime images of children being brutally assaulted and raped by male adults.



25 *Examples of images obtained on Discord servers by the National Center on Sexual*
26 *Exploitation.*¹⁹¹

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28 ¹⁹¹ National Center on Sexual Exploitation, Compilation of Proof,

1 157. Discord is also permeated with actual child pornography, or CSAM, hosting
2 hundreds if not thousands of servers dedicated to trading and sharing CSAM. For example, in a
3 June 2023 article, NBC News reported that “[i]n a review of publicly listed Discord servers created
4 in the last month,” it “identified 242 that appeared to market sexually explicit content of minors,
5 using thinly veiled terms like ‘CP’ that refer to child sexual abuse material.”¹⁹²

6 158. Predators themselves even admit that Discord is a go-to app for them for finding
7 and sharing CSAM. In February 2024, a nonprofit called Protect Children released a report, “Tech
8 Platforms Used by Online Child Sexual Abuse Offenders,” which contained survey data from
9 anonymous individuals searching for CSAM on the dark web. That survey revealed that Discord is
10 one of their “top platforms” for searching for, viewing, or sharing CSAM.¹⁹³ Based on the results
11 of this survey, the report found an “unmistakable overlap” between “the platforms most used for
12 viewing and sharing CSAM and the platforms most popular among children and young people.”¹⁹⁴

13 159. Through numerous well-documented and publicized cases, Discord has long been
14 aware of the proliferation of CSAM and similar material that its app enables and facilitates,
15 including because in some of these cases, Discord reported the material to the National Center for
16 Missing and Exploited Children, which then reported the material to the authorities.

17 160. From its beginning, Discord has been at the center of numerous criminal cases
18 involving CSAM. According to court documents from a federal case involving a vast CSAM
19 enterprise and conspiracy, between 2016 and 2018, ten men “utilized chatrooms on the online
20 service ‘Discord’—an application designed for online gaming communities that allows users to
21
22

23 _____
24 [https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-
2023DDL_Discord.pdf](https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-2023DDL_Discord.pdf).

25 ¹⁹² Ben Goggin, *Child Predators Are Using Discord, a Popular App Among Teens, for Sextortion
26 and Abductions*, NBC News (July 21, 2023), [https://www.nbcnews.com/tech/social-
media/discord-child-safety-social-platform-challenges-rcna89769](https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769).

27 ¹⁹³ Protect Children, *Tech Platforms Used By Online Child Sexual Abuse Offenders* (Feb. 2024),
[https://bd9606b6-40f8-4128-b03a-
9282bdcfff0f.usrfiles.com/ugd/bd9606_0d8ae7365a8f4bfc977d8e7aeb2a1e1a.pdf](https://bd9606b6-40f8-4128-b03a-9282bdcfff0f.usrfiles.com/ugd/bd9606_0d8ae7365a8f4bfc977d8e7aeb2a1e1a.pdf).

28 ¹⁹⁴ *Id.*

1 engage in text chat and share images and videos—to produce and exchange child pornography.”¹⁹⁵
2 They pled guilty and were sentenced to long prison terms. Similarly, according to court documents
3 in another case, between 2019 and 2020, a North Carolina man was able to use Discord to chat
4 about and trade CSAM.¹⁹⁶ He pled guilty and was sentenced to 240 months in federal prison.

5 161. Similar incidents occurred throughout 2021 and 2022. In 2021, for example, federal
6 authorities arrested an Idaho man after locating numerous files of CSAM that he had uploaded to
7 his Discord account.¹⁹⁷ And in 2022, a Louisiana man pled guilty to possessing CSAM, admitting
8 that “he created a Discord account,” that “other Discord users would share CSAM on the website,”
9 and that he would “upload the saved CSAM from his phone to other Discord users.”¹⁹⁸ Several
10 months later, a New York man was arrested for uploading and distributing CSAM using Discord.¹⁹⁹
11 And two months later, a University of Florida quarterback was arrested and accused of sharing
12 CSAM on Discord.²⁰⁰ When the man spoke with the police after his arrest, he admitted that he had
13 been on Discord servers that “discuss, solicit, and distribute child sexual abuse material.”²⁰¹

14 162. 2023 was no different. For example, at the start of the year, a New York man was
15 arrested and charged with creating and sharing CSAM through Discord after a police investigation
16

17 ¹⁹⁵ U.S. Dep’t of Justice, *Ten Men Sentenced to Prison for Their Roles in a Child Exploitation*
18 *Enterprise and Conspiracy* (Oct. 1, 2020), [https://www.justice.gov/opa/pr/ten-men-sentenced-](https://www.justice.gov/opa/pr/ten-men-sentenced-prison-their-roles-child-exploitation-enterprise-and-conspiracy)
[prison-their-roles-child-exploitation-enterprise-and-conspiracy](https://www.justice.gov/opa/pr/ten-men-sentenced-prison-their-roles-child-exploitation-enterprise-and-conspiracy).

19 ¹⁹⁶ U.S. Dep’t of Justice, *Man in Possession of Child Sexual Abuse Material Is Sentence to 20*
20 *Years in Prison* (Feb. 17, 2023), [https://www.justice.gov/usao-wdnc/pr/man-possession-child-](https://www.justice.gov/usao-wdnc/pr/man-possession-child-sexual-abuse-material-sentenced-20-years-prison)
[sexual-abuse-material-sentenced-20-years-prison](https://www.justice.gov/usao-wdnc/pr/man-possession-child-sexual-abuse-material-sentenced-20-years-prison).

21 ¹⁹⁷ U.S. Dep’t of Justice, *Nampa Man Sentenced to 6 Years in Federal Prison Possessing Child*
22 *Pornography* (Dec. 12, 2023), [https://www.justice.gov/usao-id/pr/nampa-man-sentenced-6-years-](https://www.justice.gov/usao-id/pr/nampa-man-sentenced-6-years-federal-prison-possessing-child-pornography)
[federal-prison-possessing-child-pornography](https://www.justice.gov/usao-id/pr/nampa-man-sentenced-6-years-federal-prison-possessing-child-pornography).

23 ¹⁹⁸ U.S. Dep’t of Justice, *Registered Sex Offender Pleads Guilty to Possession of Child Sex Abuse*
24 *Material* (May 10, 2022), [https://www.justice.gov/usao-edla/pr/registered-sex-offender-pleads-](https://www.justice.gov/usao-edla/pr/registered-sex-offender-pleads-guilty-possession-child-sexual-abuse-material)
[guilty-possession-child-sexual-abuse-material](https://www.justice.gov/usao-edla/pr/registered-sex-offender-pleads-guilty-possession-child-sexual-abuse-material).

25 ¹⁹⁹ News 12 Staff, *Prosecutor: Phillipsburg Man Distributed Child Pornography Through*
26 *Discord*, News12 The Bronx (Sept. 28, 2022), [https://bronx.news12.com/prosecutor-phillipsburg-](https://bronx.news12.com/prosecutor-phillipsburg-man-distributed-child-pornography-through-discord)
[man-distributed-child-pornography-through-discord](https://bronx.news12.com/prosecutor-phillipsburg-man-distributed-child-pornography-through-discord).

27 ²⁰⁰ Tim Stelloh & Antonio Planas, *University of Florida Quarterback Arrested and Accused of*
28 *Sharing Child Sexual Abuse Images on Discord*, NBC News (Nov. 30, 2022),
[https://www.nbcnews.com/news/us-news/university-florida-quarterback-arrested-allegedly-](https://www.nbcnews.com/news/us-news/university-florida-quarterback-arrested-allegedly-sharing-child-sexual-rcna59513)
[sharing-child-sexual-rcna59513](https://www.nbcnews.com/news/us-news/university-florida-quarterback-arrested-allegedly-sharing-child-sexual-rcna59513).

²⁰¹ *Id.*

1 revealed that he had allegedly instructed a 13-year-old boy to provide images and videos of himself
2 committing sex acts on a 4-year-old girl.²⁰² The next month, a Vancouver man was found guilty of
3 numerous charges, including distributing and possessing CSAM, based largely on communications
4 and videos the man shared on Discord showing the sexual assault of an infant by an adult man.²⁰³

5 163. These incidents continued throughout 2024. In February, for example, a New Jersey
6 man was arrested after an investigation revealed that he had uploaded to Discord a file depicting
7 the sexual exploitation or abuse of minors.²⁰⁴ At the time, the man was employed at a school serving
8 students as young as five years old. A few months later, an Oklahoma man was arrested and charged
9 with possessing and distributing CSAM after he shared CSAM on Discord.²⁰⁵ Later that year, a
10 former Indiana firefighter was arrested after police learned he was trading CSAM on Discord.²⁰⁶

11 2. Discord provides a hunting ground for child-sex predators.

12 164. Discord has also created a haven for predators seeking to groom, traffic, and
13 sexually abuse minors by providing predators with endless opportunities for unmitigated
14 interactions with children through public servers, direct messages, and video/voice chat channels.

15 165. Discord hosts numerous servers that openly operate as spaces where children are
16 sexually exploited by predators. In its June 2023 article on Discord, NBC News reported that it
17 found numerous servers involving adults pretending to be teens to entice children into sharing
18 nude images. NBC News described several servers that explicitly solicited minors to join “not safe
19

20 ²⁰² *West New York Man Charged with Child Abuse Material*, Hudson Reporter (Jan. 19, 2023),
21 [https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-](https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-material/)
22 [material/](https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-material/).

23 ²⁰³ Fox 12 Staff, *Washougal Man Gets 108 Years for Child Rape, Creating Child Sex Assault*
24 *Materials*, Fox 12 Oregon (Mar. 25, 2023), [https://www.kptv.com/2023/03/25/washougal-man-](https://www.kptv.com/2023/03/25/washougal-man-gets-108-years-child-rape-creating-child-sex-assault-materials/)
25 [gets-108-years-child-rape-creating-child-sex-assault-materials/](https://www.kptv.com/2023/03/25/washougal-man-gets-108-years-child-rape-creating-child-sex-assault-materials/).

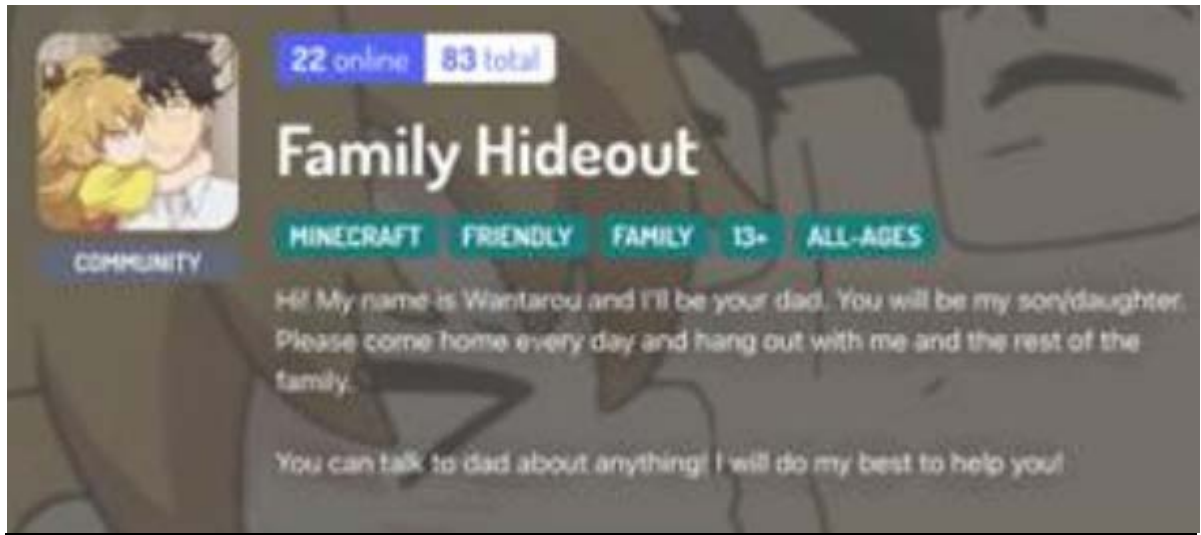
26 ²⁰⁴ Morris County Prosecutor’s Office, *Jefferson Resident Arrested for Child Pornography* (Feb.
27 16, 2024), [https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-](https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-Releases/Jefferson-Resident-Arrested-for-Child-Pornography)
28 [Releases/Jefferson-Resident-Arrested-for-Child-Pornography](https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-Releases/Jefferson-Resident-Arrested-for-Child-Pornography).

29 ²⁰⁵ *Wagoner Man Arrested, Accused of Distributing Child Pornography Over Discord*, Fox 23
30 News (June 25, 2024), [https://www.fox23.com/news/wagoner-man-arrested-accused-of-](https://www.fox23.com/news/wagoner-man-arrested-accused-of-distributing-child-pornography-over-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html)
31 [distributing-child-pornography-over-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html](https://www.fox23.com/news/wagoner-man-arrested-accused-of-distributing-child-pornography-over-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html).

32 ²⁰⁶ Joe Schroeder, *Docs: Ex-Indiana Firefighter Traded Porn on Discord, Dated a 17-year-old*,
33 Fox 59 (Sept. 4, 2024), [https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-](https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-child-porn-on-discord-dated-a-17-year-old/)
34 [child-porn-on-discord-dated-a-17-year-old/](https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-child-porn-on-discord-dated-a-17-year-old/).

1 for work” communities, including one server that promoted itself on the public server database as
2 “a community for people between the ages of 13-17. We trade nudes, we do events. Join us for
3 the best Teen-NSFW experience <3.”²⁰⁷ Another server claimed to accept “little girls 5-17 only”
4 and had chat channels with titles such as “begging-to-have-sex-chat” and “sexting-chat-with-the-
5 server-owner.”²⁰⁸ Still another server directly solicited nude images from minors to gain access:
6 “YOU NEED TO SEND A VERIFICATION PHOTO TO THE OWNER. IT HAS TO BE
7 NUDE.”²⁰⁹

8 166. Other Discord servers are only slightly less obvious. For example, a server called
9 “Family Hideout” centered on an adult man who called himself “Dad” and built a “family” of
10 children online.²¹⁰ In this server, which was labeled “Friendly,” “Family,” and “All-Ages,”
11 the man developed relationships with children and encouraged them to take and share nude images.



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21 *Family Hideout server in March 2023.*

22 167. Other servers are more discreet yet are still widely known as places where children
23 are groomed. For instance, a server called “FurWaterSportsAndYiff” was described as “Full of
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25

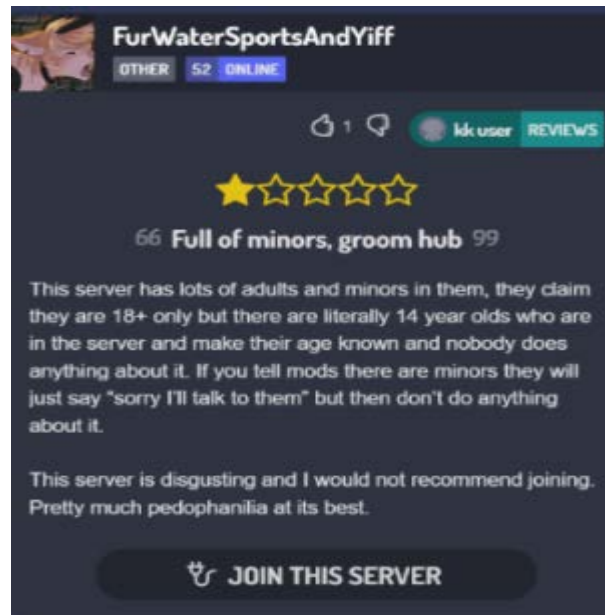
26 ²⁰⁷ Goggin, *supra* note 180.

27 ²⁰⁸ *Id.*

28 ²⁰⁹ *Id.*

²¹⁰ National Center on Sexual Exploitation, *supra* note 179.

1 minors, groom hub” by one disgusted reviewer of the server. According to the reviewer, this server
2 was filled with minors and adults and was “[p]retty much pedophilia at its best.”²¹¹



13 *This server existed on Discord from 2022 through at least April 2023.*

14 168. Through numerous well-documented and publicized cases, Discord has long known
15 that its app enables and facilitates the grooming, trafficking, and sexual abuse of minors. For
16 example, in its June 2023 article, NBC News reviewed publicly available information since Discord
17 was founded and identified 35 cases in the previous six years in which adults were prosecuted on
18 charges of kidnapping, grooming, or sexual assault that involved communications on Discord.²¹²
19 Because these cases were only those that were reported, investigated, and prosecuted during that
20 time, “What we see is only the tip of the iceberg,” explained a child safety advocate.

21 169. Over the years, countless criminal cases have exposed the critical role that Discord
22 plays in enabling and facilitating grooming and other predatory conduct. In 2022, for instance, an
23 Indiana man pled guilty to sexual exploitation of a minor and possession of CSAM after the FBI
24 discovered that he had engaged in sexually explicit conversations with an 11-year-old girl on
25

27 ²¹¹ *Id.*

28 ²¹² Goggin, *supra* note 180.

1 Discord and coerced the girl into sending sexually explicit images of herself.²¹³ The girl later told
2 police that she communicated with the man via chats, video calls, and voice calls on Discord. Later
3 that year, an Oregon man was federally charged with child exploitation crimes following an
4 investigation that found he had “pretended to be an Oregon teenager to convince the child to engage
5 in sexually explicit acts during a video chat on Discord.”²¹⁴

6 170. Similar cases were brought throughout 2023 and 2024. In March 2023, for example,
7 a man was charged after he allegedly had a sexually explicit conversation with a 14-year-old girl
8 and shared CSAM with her—all on Discord.²¹⁵ At the time, the man was a middle-school science
9 teacher and had engaged in this conduct at the school where he was employed. And in 2024, a
10 South Carolina man was sentenced to 20 years in federal prison after he pled guilty to numerous
11 crimes he committed against children on Discord, including coercing minor girls into performing
12 livestream sexual acts for him in a Discord call that he recorded.²¹⁶ The man also made repeated
13 threats to the girls and their families, and one of the girls attempted suicide because of this abuse.

14 171. Discord has also been at the center of numerous cases involving the kidnapping and
15 sexual assault of minors. For example, in 2021, a Virginia man was arrested and charged with
16 sexually exploiting and kidnapping a 12-year-old girl from her home in California.²¹⁷ According
17

18 ²¹³ Phyllis Cha, *Marion County Corrections Employee Fired, Arrested Over Sexually Explicit*
19 *Images to Girl*, IndyStar (Sept. 7, 2022),

20 <https://www.indystar.com/story/news/crime/2022/09/07/corrections-officer-marion-county-employee-sexually-explicit-messages-to-child/65781240007/>.

21 ²¹⁴ U.S. Dep’t of Justice, *Oregon Man Charged with Sexually Exploiting Minor on Discord, Additional Victims Sought* (Oct. 3, 2022), <https://www.justice.gov/usao-or/pr/oregon-man-charged-sexually-exploiting-minor-discord-additional-victims-sought>.

22 ²¹⁵ *NJ Teacher Charged After “Sexually Explicit Conversation” with Teen*, New Jersey 101.5
23 (Mar. 3, 2023), <https://nj1015.com/nj-teacher-charged-after-sexually-explicit-conversation-with-teen/>.

24 ²¹⁶ Alan Hovorka, *Lowcountry US Army Member Who Groomed Girls, Recorded Child Porn on*
25 *Discord Sentenced to Prison*, Post & Courier (Aug. 3, 2024),
26 https://www.postandcourier.com/news/evan-bucci-child-porn-discord-grooming/article_09cf85ce-50dc-11ef-84b2-7b7358023542.html.

27 ²¹⁷ Dan Morse, *With Children Stuck at Home During Coronavirus Shutdowns, Online Sexual*
28 *Predators Can Swoop In*, Wash. Post (Feb. 12, 2023),
https://www.washingtonpost.com/local/public-safety/coronavirus-lockdown-child-exploitation/2021/02/04/90add6a6-462a-11eb-a277-49a6d1f9dff1_story.html.

1 to court documents, the man met and groomed the girl on Discord, flew to California and picked
2 her up at her house at 2:30 a.m., and was arrested at the Denver airport during a layover.

3 172. Similarly, in February 2023, a Michigan man was arrested and charged with
4 kidnapping a 14-year-old Washington girl whom he had met and groomed on Discord.²¹⁸ The next
5 month, a North Carolina man was arrested and charged with rape, child abduction, and human
6 trafficking after police rescued a 13-year-old from a locked shed behind his house.²¹⁹ According to
7 the girl's mother, the man had been communicating with her daughter for months on Discord before
8 he abducted her from her home in Dallas.

9 173. 2024 brought more of the same. In February, a Texas man was charged with human
10 trafficking and sexual assault of a 16-year-old girl whom he met and communicated with on
11 Discord.²²⁰ The girl told police that the man picked her up in Kansas and brought her to his
12 apartment in Texas, where they had sex multiple times. A few months later, a North Carolina man
13 was charged with kidnapping and raping a 12-year-old girl he had met on Discord.²²¹ Around the
14 same time, a Pennsylvania man was arrested and charged with multiple offenses, including rape of
15 a child and indecent assault of a person less than 13 years of age.²²² The police investigation
16
17

18 ²¹⁸ Ruth Bashinsky, *Washington State Girl, 14, Who Went Missing with "Man She met on*
19 *Discord" Near Notorious Sex Trafficking Corridor FOUND: Michigan Man Arrested over*
20 *Kidnapping*, Daily Mail (Feb. 1, 2024), <https://www.dailymail.co.uk/news/article-13034633/washington-state-girl-missing-discord-sex-trafficking-michigan.html>.

21 ²¹⁹ Peter Charalambous & Alexandra Faul, *Missing 13-year-old Rescued from Locked North*
22 *Carolina Shed*, ABC News (Mar. 14, 2023), <https://abcnews.go.com/US/missing-13-year-rescued-locked-north-carolina-shed/story?id=97830147>.

23 ²²⁰ Brittany Eubank, *Man and His Mother Charged After Missing Kansas Teen Found Safe in*
24 *Central Texas*, KVUEabc (Feb. 8, 2024), <https://www.kvue.com/article/news/crime/austin-human-trafficking-sexual-assault-missing-kansas-teen/269-361c25e3-12a8-4ec4-8779-0f962c12e8d1>.

25 ²²¹ "Under 13 Is Under 13": Judge Responds to Attorney's Claim That Man Charged with
26 *Kidnapping & Rape Believed 12-year-old Girl Was College Student*, WRAL News (Apr. 16,
2024), <https://www.wral.com/story/under-13-is-under-13-judge-responds-to-attorney-s-claims-that-man-charged-with-kidnapping-rape-believed-12-year-old-girl-was-col/21381250/>.

27 ²²² Keith Heffintrayer, *Four Men Arrested Following Investigation into Sexual Abuse of 12-year-*
28 *old Boy in Upper Gwynedd*, NorthPennNow (Apr. 15, 2024),
<https://northpennnow.com/news/2024/apr/15/four-men-arrested-following-investigation-into-sexual-abuse-of-12-year-old-boy-in-upper-gwynedd-police-say/>.

1 revealed that the man was communicating with the 12-year-old boy on Discord, which included
2 sexual conversations and making plans to meet.

3 174. Despite Discord’s repeated assurances to parents that it has a “zero tolerance” policy
4 for the criminal acts described above and that its product is built on safety, the rampant sexual
5 exploitation of children on Discord has gotten only worse over the years—not better. John Shehan,
6 the Senior Vice President of the National Center for Missing and Exploited Children, emphasized
7 that his organization has seen “explosive growth” in CSAM and exploitation on Discord.²²³ “There
8 is a child exploitation issue on the platform. That’s undeniable,” he stated.

9 175. Indeed, for four consecutive years, the National Center on Sexual Exploitation
10 (“NCSE”) has named Discord to its “Dirty Dozen” list (which also includes Roblox, as discussed
11 above). As NCSE put it, “Discord enables exploiters to easily contact and groom children,” and
12 predators “take advantage of Discord’s dangerous designs to entice children into sending sexually
13 explicit images of themselves.”²²⁴

14 176. Discord itself confirms that this criminal conduct that it enables has only become
15 more pervasive. Discord, for example, revealed that in the fourth quarter of 2023, it received
16 416,036 reports from users regarding “Child Safety” issues, which includes CSAM.²²⁵ By the next
17 quarter, that number had grown to 1,035,166—a roughly 150% increase.²²⁶

18 **4. Roblox and Discord work in tandem to facilitate child sexual exploitation.**

19 177. Roblox and Discord serve as the preferred apps for predators seeking to identify and
20 then sexually exploit children. As explained above, the tried-and-true playbook these predators
21 follow is to misrepresent their age on Roblox to child users, pretending to be a fellow child, befriend
22 the vulnerable young victims, and then manipulate the children to move the conversation off

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24 ²²³ Goggin, *supra* note 180.

25 ²²⁴ National Center on Sexual Exploitation, *supra* note 58.

26 ²²⁵ Discord, *Discord Transparency Report: January – March 2023*, https://cdn.prod.website-files.com/625fe439fb70a9d901e138ab/64b16dade9ba30617e30a40a_Q1%2023%20%7C%20Discord%20Transparency%20Report_%20JANUARY%20-%20MARCH%202023.pdf.

27 ²²⁶ Discord, *Discord Transparency Report: January – June 2024*, https://cdn.prod.website-files.com/625fe439fb70a9d901e138ab/67056a054d453d30491c1ac9_Discord%20Jan_Jun%202024%20Transparency%20Report.pdf.

1 Roblox to Discord, where they coerce the children into sending sexually explicit images or into
2 meeting in person so they can sexually abuse them.

3 178. Roblox and Discord designed their apps to work together seamlessly. As described
4 above, Roblox encourages users to communicate on Discord by allowing links to Discord servers
5 and channels to be displayed on game or group pages and by permitting users to include their
6 Discord usernames in their Roblox profiles. Discord, for its part, enables users to link their Roblox
7 accounts to their Discord accounts.²²⁷ Their “activity status” on Discord then shows other users,
8 including predators, when they are playing Roblox and what game they are playing. On Discord,
9 users can also send other users the codes for Robux gift cards to redeem on Roblox.

10 179. Through numerous media reports and well publicized criminal cases, Roblox and
11 Discord have long known that their apps jointly enable predators to systematically harm children.
12 For example, in 2019, a Florida man was arrested after law enforcement learned that he was using
13 Roblox and Discord to target children.²²⁸ According to authorities, the man targeted children
14 between ages 10 and 12 on Roblox and then coerced them on Discord into sending sexually explicit
15 images of themselves in exchange for Robux.

16 180. Similarly, in January 2022, a Florida man was arrested following a lengthy
17 investigation that revealed that he posed as a teen girl on Roblox to meet a 13-year-old boy and
18 then convinced to boy to send him sexually explicit images on Discord in exchange for Robux.²²⁹
19 Later that year, an Arizona man was arrested for kidnapping a 13-year-old boy he met on Roblox.²³⁰

21 ²²⁷ YouTube, *How to Link Roblox to Discord* (2025),
22 <https://www.youtube.com/watch?v=80ZEwlgecDM>.

23 ²²⁸ Max Chesnes, *Deputies Say Vero Beach Man Used Popular Video Game Platforms to Target*
24 *Children*, TCPalm (Aug. 20, 2019), <https://www.tcpalm.com/story/news/crime/indian-river-county/2019/08/20/detectives-advise-online-safety-after-vero-beach-man-used-video-game-platforms-target-minors/2059599001/>.

25 ²²⁹ Irene Wright, *Man Blackmailed Teen Boy as He Posed as Girl on Roblox and Discord, Florida*
26 *Cops Say*, Miami Herald (Aug. 11, 2023),
<https://www.miamiherald.com/news/state/florida/article278172607.html>.

27 ²³⁰ Jerry Lambe, *Arizona Man Allegedly Kidnapped a Buy He Lured from Discord. Police Say*
28 *They Rescued the Victim Thanks to an “Alert Gas Station Attendant,”* Law & Crime (Dec. 29,
2022), <https://lawandcrime.com/crime/arizona-man-allegedly-kidnapped-a-boy-he-lured-from-discord-police-say-they-rescued-the-victim-thanks-to-an-alert-gas-station-attendant/>.

1 According to police, the man sent sexual and inappropriate messages on Roblox to the boy and
2 then invited him to join a Discord chat, where the man arranged to pick the boy up from his house.

3 181. These real-life nightmares occurred repeatedly throughout last year. In November
4 2024, for example, the FBI arrested a Michigan man and charged him with numerous crimes related
5 to his sexual exploitation of possibly over 100 children.²³¹ The man told law enforcement that “he
6 used Roblox to talk to others sexually, some of whom he allegedly knew were children,” and then
7 transitioned the conversations to Discord and coerced the children into sending nude images.²³²

8 182. And in January this year, a Louisiana man was arrested and federally charged for
9 sexually exploiting a teenage girl through Roblox and Discord.²³³ According to arrest records, the
10 man “began communicating with her on Roblox, before transitioning her to Discord,” where he
11 coerced her into sending sexually explicit images of herself.²³⁴

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

13 183. Like Roblox, Discord is overrun with harmful content and predators because the
14 company prioritizes growth, revenue, and eventual profits over child safety. For years, Discord has
15 knowingly prioritized these numbers over the safety of children through the actions it has taken
16 and decisions it has made to increase and monetize users regardless of the consequences.

17 **1. Discord prioritizes growth over the safety of children.**

18 184. Although Discord began as a communications app for gamers, its co-founders Jason
19 Citron and Stanislav Vishnevskiy soon realized that Discord appealed to a much broader audience
20 and sought to expand its user base. “We saw an opportunity to make communications easier for
21
22

23 ²³¹ Samantha Sayles, *Monroe County Man Uses Roblox, Discord, Snapchat to Sexually Assault*
24 *Children*, ClickOnDetroit (Nov. 15, 2024),
25 <https://www.clickondetroit.com/news/local/2024/11/15/monroe-county-man-uses-roblox-discord-snapchat-to-sexually-exploit-children/>.

26 ²³² *Id.*

27 ²³³ WAFB Staff, *Man Accused of Internet Sex Crimes Allegedly Met Victims on Roblox, Discord*,
28 WAFB (Jan. 31, 2025), <https://www.wafb.com/2025/01/31/man-accused-internet-child-sex-crimes-allegedly-met-victims-roblox-discord/>.

²³⁴ *Id.*

1 everyone, not just gamers,” Citron explained.²³⁵ So the company changed its motto from “Chat for
2 gamers” to “A new way to chat with your communities and friends” and became hyper-focused on
3 transforming into a universal communication product.²³⁶

4 185. Discord has since grown exponentially. In 2019, the company had 56 million
5 monthly active users.²³⁷ But with Discord’s shift away from gaming in 2020, combined with its
6 pandemic-driven explosion in popularity among young users, the company grew its monthly active
7 users to 150 million by 2022.²³⁸ Today, Discord boasts over 200 million monthly active users.²³⁹

8 186. As Discord has grown, private investors have poured money into the company. In
9 June 2020, Discord raised \$100 million at a \$3.4 billion dollar valuation.²⁴⁰ Just five months later,
10 the company raised another \$100 million at more than double the valuation (\$6.90 billion).²⁴¹ In
11 early 2021, Discord rebuffed an acquisition offer from Microsoft of at least \$10 billion.²⁴² Later
12 that year, it raised another \$500 million at a staggering valuation of \$14.5 billion.²⁴³ While Discord
13 has remained privately held so far, the company is expected to go public this year.²⁴⁴

14 187. A primary reason for investors’ interest in Discord is its user growth, putting
15 enormous pressure on the company to prioritize growing its users above all else. Growing its users
16

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18 ²³⁵ Nathan Latka, *Discord’s \$879M Revenue: 25 Moves to \$25B Valuation*, LATKA-B2B Saas
Blog (Jan. 15, 2025), <https://blog.getlatka.com/discord-revenue/>.

19 ²³⁶ Kellen Browning, *How Discord, Born from an Obscure Game, Became a Social Hub for Young
20 People*, N.Y. Times (Dec. 29, 2021), [https://www.nytimes.com/2021/12/29/business/discord-
server-social-media.html](https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html).

21 ²³⁷ HelpLama, *Discord Revenue and Usage Statistics 2025*, [https://helplama.com/discord-
statistics/](https://helplama.com/discord-statistics/).

22 ²³⁸ *Id.*

23 ²³⁹ Podcast Transcript, *Discord CEO Jason Citron Makes the Case for a Smaller, More Private
Internet*, The Verge (Apr. 22, 2024), [https://www.theverge.com/24134914/discord-ceo-gaming-
chat-teens-safety-moderation-decoder-interview](https://www.theverge.com/24134914/discord-ceo-gaming-chat-teens-safety-moderation-decoder-interview).

24 ²⁴⁰ Equitybee, *Discord Funding History*,
25 <https://equitybee.com/companies/company?company=discord> (last visited Feb. 11, 2025).

26 ²⁴¹ *Id.*

27 ²⁴² Sarah E. Needleman, *Discord Ends Deal Talks with Microsoft*, Wall. St. J. (Apr. 20, 2021),
<https://www.wsj.com/articles/discord-ends-deal-talks-with-microsoft-11618938806>.

28 ²⁴³ *Id.*

²⁴⁴ Chris Morris, *These Are the Most Anticipated IPOs to Watch in 2025*, FastCompany (Dec. 30,
2024), <https://www.fastcompany.com/91243719/most-anticipated-ipos-to-watch-in-2025>.

1 is critical to the company’s revenue and future profitability. Discord generates most of its revenue
2 from its subscription service called Nitro, which provides users with benefits such as custom
3 emojis, unlimited “super reactions,” and HD video streaming. As the company expanded its user
4 base, its revenue skyrocketed from \$150 million in 2020 to \$600 million in 2024.²⁴⁵ And while for
5 years Discord shunned advertising on its app, the company recently started selling advertisements
6 to boost revenue by capitalizing on its massive and growing user base.²⁴⁶

7 188. Discord’s growth strategy has focused on a user-centric approach that prioritizes
8 user preferences over child safety. As Discord CEO and co-founder Jason Citron put it, “We focus
9 on what our users love, and that drives everything we do.”²⁴⁷ In practice, that has resulted in Discord
10 elevating the privacy of its users over protecting children in order to attract as many users to its app
11 as possible. For example, Discord continues to allow people to chat using fake names and does not
12 require individuals to enter their real names when registering for an account, ensuring that predators
13 will continue to flock to Discord because they can remain anonymous. And while other digital
14 platforms verify users’ ages and restrict communications between children and adults, Discord does
15 not require age verification and does not restrict communications between children and adults.

16 189. Discord even prioritizes user privacy over child safety with a feature it recently
17 added to supposedly allow parents to monitor their children’s Discord use. In 2023, Discord created
18 its “Family Center for Parents and Guardians”—a “completely opt-in feature” that is “not
19 mandatory for teens.”²⁴⁸ While this feature permits parents to monitor some of their children’s
20 activity on Discord, it prohibits parents from accessing the most important information on their
21

22 ²⁴⁵ Salvatore Rodriguez & Sarah E. Needleman, *Discord to Start Showing Ads for Gamers to*
23 *Boost Revenue*, Wall St. J. (Mar. 30, 2024), [https://www.wsj.com/tech/discord-to-start-showing-](https://www.wsj.com/tech/discord-to-start-showing-ads-for-gamers-to-boost-revenue-bf5848b9)
24 [ads-for-gamers-to-boost-revenue-bf5848b9](https://www.wsj.com/tech/discord-to-start-showing-ads-for-gamers-to-boost-revenue-bf5848b9).

25 ²⁴⁶ Equitybee, *Discord Funding History*,
<https://equitybee.com/companies/company?company=discord> (last visited Feb. 11, 2025).

26 ²⁴⁷ Nathan Latka, *Discord’s \$879M Revenue: 25 Moves to \$25B Valuation*, LATKA-B2B Saas
Blog (Jan. 15, 2025), <https://blog.getlatka.com/discord-revenue/>.

27 ²⁴⁸ Discord, *What Is Family Center?*, [https://support.discord.com/hc/en-](https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=We%20value%20your%20privacy%20which,names%2C%20server%20icons%2C%20and%20member)
28 [us/articles/14155039712407-What-is-Family-](https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=We%20value%20your%20privacy%20which,names%2C%20server%20icons%2C%20and%20member)
[Center#:~:text=We%20value%20your%20privacy%20which,names%2C%20server%20icons%2C%20and%20member](https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=We%20value%20your%20privacy%20which,names%2C%20server%20icons%2C%20and%20member) (last visited Feb. 11, 2025).

1 accounts—the contents of their messages. As Discord tells children, “We value your privacy which
2 is why connected accounts will not have access to the contents of your messages.”²⁴⁹ Discord also
3 assures children that, with Family Center, “you have control over whether or not you use this
4 feature, how long you want to use it for, and who you connect your account to.”²⁵⁰ By putting
5 children in charge of this parental feature, Discord seeks to preserve growth of this key
6 demographic.

7 190. In pursuit of growth, Discord has also chosen not to implement easy measures that
8 would protect children but stunt user growth, such as age verification to ensure that children under
9 13 cannot create accounts and that adults cannot misrepresent their age to children.

10 191. Discord has also fought attempts to be held publicly accountable for the sexual
11 exploitation of children that its app enables. In November 2023, Discord’s CEO and co-founder
12 Jason Citron refused to accept service of a subpoena to testify before the U.S. Senate as part of its
13 hearing on “Big Tech and the Online Child Sexual Exploitation Crisis.”²⁵¹ Citron appeared at the
14 hearing only after the Senate was forced to enlist the U.S. Marshals Service to personally subpoena
15 him—a situation the Senate called “a remarkable departure from typical practice.”²⁵²

16 192. The National Center for Missing and Exploited Children, which internet companies
17 are by law required to report instances of child sex abuse to, also reported issues working with
18 Discord and had to rescind an invitation to become part of its Cybertipline Roundtable when the
19 company failed to “identify a senior child safety representative to attend.”²⁵³ “It was really
20 questionable, their commitment to what they’re doing on the child exploitation front,” stated John
21 Shehan, the Senior Vice President of the National Center for Missing and Exploited Children.²⁵⁴

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23
24 ²⁴⁹ *Id.*

25 ²⁵⁰ *Id.*

26 ²⁵¹ *Senate Panel Forced to Use U.S. Marshals to Subpoena CEOs of X and Discord to Testify on
Protecting Kids Online*, CBS News (Nov. 21, 2023), <https://www.cbsnews.com/news/senate-panel-us-marshals-subpoenas-ceos-x-discord/>.

27 ²⁵² *Id.*

28 ²⁵³ Goggin, *supra* note 180.

²⁵⁴ *Id.*

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

3 193. Discord’s pursuit of growth over child safety is reflected in numerous actions it took
4 and decisions it made related to the design and safety of its app. Had Discord acted differently, the
5 harm suffered by countless children would not have occurred.

6 194. Discord designed its app so that anyone can easily communicate with children,
7 creating a virtual world where predators can freely target and sexually exploit children. Despite its
8 repeated assurances to parents that its app “defaults” to safety for child accounts, Discord, in fact,
9 designed its app to default to settings that facilitate the sexual exploitation of children.

10 195. Discord, for example, defaults to settings that allow predators to send direct
11 messages to children. Predators often identify and target children by joining servers that are
12 populated with kids. By default, Discord allows any two people who share a server to direct
13 message each other, providing predators with an easy means of contacting and communicating with
14 children. Predators also often initiate contact with children by adding a child as a “friend” on
15 Discord so they can direct message them. By default, Discord permits children to receive friend
16 requests from “Everyone,” meaning children can receive and accept friend requests from
17 individuals whom they do not know and with whom they have no connection.

18 196. For years, Discord also defaulted to settings that enabled predators to send children
19 sexually explicit images via direct messages. In 2017, for example, Discord introduced “Safe Direct
20 Messaging.” This feature contained three options, including “Keep me safe,” which supposedly
21 would automatically scan and delete messages that a child received containing explicit content.

1 The process is pretty simple. Safe Direct Messaging has three settings:

2 The differences are pretty simple:

3 Keep me safe: The safest option. This will have Discord scan any image sent in all DMs, regardless of
4 whether you've added the user on your friend list, or the user is DMing you just by sharing a mutual
5 server.

6 My friends are nice: The medium-est option! This will let Discord know to scan any images sent in
7 DMs from users that aren't on your friends list, but also to trust your previously-added friends and not
8 worry about any images they send.

9 Do not scan: The self-confident option. Enabling this option will completely disable Discord's image
10 scanning process, and leave you for a walk on the wild side for any and all DMs you receive. Careful, it's a
11 jungle out there!

12 *Discord's description of the categories of its Safe Direct Messaging feature.*²⁵⁵

13 197. Consistent with Discord's "default to safety" promise, the company long
14 represented that the "Keep me safe" option was on by default. In fact, though, Discord defaulted
15 not to this most restrictive setting but to the lower setting of "My friends are nice," which meant
16 that Discord would not scan any images from a child's "friend"—which could be anyone.

17 **If you do not want to see age-restricted content on Discord**

18 If you do not want to be exposed to age-restricted content on Discord, or if you are under 18 years old, we recommend **turning on**
19 **the explicit media content filter in your privacy settings**. In your *User Settings*, select *Privacy & Safety*, and choose 'Keep me safe'
20 under *Safe Direct Messaging*. This setting is on by default and will ensure that images and videos in all direct messages are scanned by
21 Discord and age-restricted content is blocked.

22 *Discord's "Age-Restricted Content on Discord" webpage in 2022.*²⁵⁶

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25 ²⁵⁵ Discord, *Discord Safety: Safe Messaging!*,
26 <https://web.archive.org/web/20210203000438/https://support.discord.com/hc/en-us/articles/115000068672-Discord-Safety-Safe-Messaging-> (archived Feb. 3, 2021).

27 ²⁵⁶ Discord, *Age-Restricted Content on Discord*,
28 https://web.archive.org/web/20220406085122mp_/https://discord.com/safety/360043653552-Age-Restricted-Content-on-Discord (archived Apr. 6, 2022) (emphasis added).

1 198. Discord later changed the labels of this feature from “Keep me safe” to “Filter all
2 direct messages” and from “My friends are nice” to “Filter direct messages from non-friends.”²⁵⁷
3 But it continued to default to the less restrictive setting: “By default, these filters are set to ‘Filter
4 direct messages from non-friends.’ Choose ‘Filter all direct messages’ if you want all direct
5 messages you receive to be filtered, or select ‘Do not filter direct messages’ to turn these filters
6 off.”²⁵⁸

7 199. Although parents can change Discord’s permissive default settings to more
8 restrictive ones, that option is meaningless because Discord enables children to modify these
9 safety settings without parental approval. So a parent might modify the default settings so that
10 their child cannot exchange direct messages with other server members or cannot receive friend
11 requests from “Everyone,” only to have their child simply change those settings to allow these
12 unfettered interactions. As Discord puts it, “[o]ur product architecture provides each user with
13 fundamental control over their experience on Discord including who they communicate with, what
14 content they see, and what communities they join or create.”²⁵⁹ By doing so, Discord strips parents
15 of basic protective options that would prevent adult strangers from targeting and exploiting their
16 children. As one parent explained in calling Discord an “EXTREMELY dangerous app,” Discord
17 does not provide “any way for parents to set settings that can’t simply be undone by kids.”²⁶⁰

18 200. Discord also refused to implement other simple measures that would have protected
19 children using its product. For example, despite having the ability to do so, Discord does not require
20 users to verify their age and identify when creating an account. Doing so would have prevented
21 predators from creating fake profiles and pretending to be children, which is their preferred
22 approach in targeting children and convincing them to share sexually explicit images. Discord also
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25 ²⁵⁷ Discord, *Helping Your Teen Stay Safe on Discord*,
26 [https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord)
27 [your-teen-stay-safe-on-discord](https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord) (archived July 11, 2023).

28 ²⁵⁸ *Id.*

²⁵⁹ Discord, *Discord Parent Hub*, <https://discord.com/safety-parents> (last visited Feb. 11, 2025).

²⁶⁰ National Center on Sexual Exploitation, *supra* note 179.

1 could have implemented basic screening measures before allowing users on the app, which would
2 have ensured that known predators are not permitted on the app.

3 201. Age and identity verification would also have prevented individuals under 13 from
4 creating accounts on Discord. In many of the criminal cases involving the sexual exploitation of
5 children on Discord, the children were under the age of 13. By requiring ID verification during the
6 account sign-up process—a practice that other online products employ—Discord could have easily
7 prevented these children from even using its app. But it chose not to, despite knowing for years
8 that children under 13 operate freely on its environment and are targeted by predators.

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

16 203. Despite these glaring failures, Discord constantly promotes its technology-focused
17 “safety solutions” including its “AI-powered moderation systems.”²⁶¹ But this technology has
18 proven grossly inadequate and insufficient to protect children from sexual exploitation. For
19 instance, Discord’s Teen Safety Assist feature, which it introduced in October 2023, is supposed to
20 “automatically blur media that may be sensitive in direct messages and group direct messages with
21 friends, as well as in servers,” and send “safety alerts” to teen users when they receive a direct
22 message from a user for the first time.”²⁶² Yet this feature is “utterly defective,” according to the
23 National Center on Child Exploitation.²⁶³ As part of its annual investigation into Discord, “NCOSE
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26 ²⁶¹ Discord, *Discord’s Commitment to Teen and Child Safety* (July 11, 2023),
<https://discord.com/safety/commitment-to-teen-child-safety>.

27 ²⁶² Savannah Badalich, *Building a Safer Place for Teens to Hang Out*, Discord (Oct. 24, 2023),
<https://discord.com/safety/safer-place-for-teens>.

28 ²⁶³ National Center on Sexual Exploitation, *supra* note 58.

1 researchers were able to send sexually explicit content from an adult account to an unconnected
2 13-year-old account, and no warning or resources were displayed.”²⁶⁴

3 204. Discord is also famously slow and ineffective at responding to child-safety issues.
4 One mother, for example, told CNN that Discord essentially refused to help her after she reported
5 that a man had communicated with her 10-year-old daughter and sent her links to pornography.²⁶⁵
6 Following the mother’s report, Discord sent her an automated message asking for “the message
7 links to the reported content for the team to review and take appropriate action.”²⁶⁶ After the mother
8 sent the requested links, Discord never responded. “There was no help at all,” she said.²⁶⁷

9 205. Child protection groups have also repeatedly highlighted flaws in Discord’s
10 approach to child safety. For example, Denton Howard, executive director of Inhope, an
11 organization of missing and exploited children hotlines from around the world, has flagged
12 numerous problems with Discord’s approach to child safety, including “slow response times to
13 reports, communications issues when [child protection] hotlines tried to reach out, hotlines
14 receiving account warnings when they try to report CSAM, the continued hosting of communities
15 that trade and create CSAM, and evidence disappearing before hearing back from Discord.”²⁶⁸

16 **VI. PLAINTIFF-SPECIFIC ALLEGATIONS**

17 124. Ethan was a bright, imaginative boy who loved gaming, streaming, and interacting
18 with friends online. But when Ethan was barely a teenager, he was horrifically and traumatically
19 sexually exploited by a dangerous predator through Defendants’ apps. As the result of Defendants’
20 reckless disregard for child safety, Ethan suffered devastating and life-altering psychological
21 trauma, and he died by suicide at age 15.

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25 ²⁶⁴ *Id.*

26 ²⁶⁵ Samantha Murphy Kelly, *The Dark Side of Discord for Teens*, CNN Business (Mar. 22, 2022),
<https://www.cnn.com/2022/03/22/tech/discord-teens/index.html>.

27 ²⁶⁶ *Id.*

28 ²⁶⁷ *Id.*

²⁶⁸ Goggin, *supra* note 180.

1 125. Ethan began using Roblox around age 9, seeking connection and entertainment. His
2 Roblox account was linked to his parents’ email addresses, with Roblox’s supposed “parental
3 controls” in place.

4 126. Plaintiff believed that Roblox was safe for children. All of Ethan’s friends were
5 using Roblox. She trusted Roblox’s supposed parental controls and believed Roblox’s promises
6 that it would monitor Ethan’s activity. Ethan also showed her what the app looked like, and she
7 believed that an app that was designed and marketed for children was safe. As discussed above,
8 Roblox spent considerable time and money publicly touting the safety and security of the app. This
9 created the public perception that Roblox had created a safe environment for kids. Unbeknownst
10 to Plaintiff at the time, this was nothing more than a false façade of safety.

11 127. By this time, Roblox had long been aware—from countless police reports and
12 incidents reported in the media—that its app was widely used by predators to target, groom, and
13 sexually exploit children. Yet rather than warn parents or take other measures to protect children
14 from harm, Roblox continued with its deceptive campaign to portray the app as safe for children
15 and to conceal information that it knew about the pervasive predatory conduct that its app enabled
16 and facilitated.

17 128. On Roblox, Ethan was contacted by a man pretending to be a child. This man, in
18 fact, was a serial child predator in his 30s. The predator engaged in a pattern of calculated grooming
19 behavior that Roblox has known about and enabled for years. He initially engaged in innocent
20 conversation but gradually escalated to sexual topics and explicit exchanges.

21 129. The predator then convinced Ethan to transition their conversations to Discord.
22 Plaintiff allowed Ethan to use Discord, with Discord’s supposed “parental controls” in place.

23 130. Plaintiff believed that Discord was safe for children. She trusted Discord’s supposed
24 “parental controls” and believed that the app was a safe place for her son to communicate with
25 friends while gaming. As discussed above, Discord spent considerable time and money publicly
26 touting the safety and security of the app. This created the public perception that Discord had
27
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1 created a safe environment for kids. Unbeknownst to Plaintiff at the time, this was nothing more
2 than a false façade of safety.

3 131. By this time, Discord had long been aware—from countless police reports and
4 incidents reported in the media—that its app was widely used by predators to target, groom, and
5 sexually exploit children. Yet rather than warn parents or take other measures to protect children
6 from harm, Discord continued with its deceptive campaign to portray the app as safe for children
7 and to conceal information that it knew about the pervasive predatory conduct that its app enabled
8 and facilitated.

9 132. On Discord, the predator increasingly demanded explicit photographs and videos.
10 The predator’s tactics included threats to post or share humiliating images and other intimidation
11 tactics designed to instill fear in Ethan. Under fear of exposure, humiliation, and threats of violence,
12 Ethan complied with these demands, believing his actions were compelled by the predator’s threats
13 and control.

14 133. Tragically, Ethan was permanently harmed and haunted by these experiences, and
15 he died by suicide at the age of 15.

16 134. After Ethan’s death, Plaintiff learned from law enforcement that the predator had
17 been arrested for sexually exploiting other children through Defendants’ apps.

18 135. Plaintiff’s loss of Ethan is an irreversible tragedy for which Defendants are
19 responsible. Had Plaintiff known the truth about Defendants’ apps, she would never have permitted
20 her son to use them. Had Defendants implemented even the most basic system of screening or age
21 and identity verification, as well as other basic safety measures, Ethan would have never interacted
22 with this predator, never suffered the harm that he did, and never died by suicide.

23 136. The harm suffered by Ethan before his death was substantial, and Plaintiff has
24 suffered profound and enduring harm as a result of the death of Ethan’s death.

1 **VII. CAUSES OF ACTION**

2 **FIRST CAUSE OF ACTION**

3 **FRAUDULENT CONCEALMENT AND MISREPRESENTATIONS**

4 **(By Plaintiff Against Each Defendant)**

5 206. Plaintiff incorporates each and every factual allegation set forth above.

6 207. This claim is brought against Defendants Roblox and Discord.

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

9 209. Each Defendant was under a duty to tell the public, users, and their parents the truth
10 and to disclose the defective conditions of its app and that the app posed serious safety risks to
11 child users because each Defendant possessed superior knowledge about the dangers of its app
12 through internal reviews, external studies known to each Defendant, and parent and police reports
13 made to each Defendant. Instead of disclosing the truth, each Defendant engaged in a widespread
14 public campaign to tout the safety of its app in the media, and in the materials provided to potential
15 users of the app, as described above.

16 210. Each Defendant made numerous false representations about the safety of its app,
17 as described above, which were specific and widespread. Plaintiff and the public at large relied on
18 each Defendant's false representations in deciding to allow children to play on the app.

19 211. Each Defendant breached its duty to the public, users, and their parents by
20 concealing and failing to disclose the serious safety risks presented by its app. Even though each
21 Defendant knew of those risks based on its internal reviews, external studies known to each
22 Defendant, and parent and police reports made to each Defendant, each Defendant intentionally
23 concealed those risks to not lose users and revenue, and to induce parents to allow their children to
24 use its app. Such risks were known only to each Defendant, and the public, users, and their parents,
25 including Plaintiff, could not have discovered such serious safety risks.

26 212. The public, users, and their parents, including Plaintiff, did not know of the serious
27 safety risks posed by the design of each Defendant's app, which were known by each Defendant.

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1 213. By intentionally concealing and failing to disclose defects inherent in the design of
2 its app, each Defendant knowingly and recklessly misled the public, users, and their parents,
3 including Plaintiff, into believing that its app was safe for children to use.

4 214. Each Defendant knew that its concealment, omissions, and misrepresentations were
5 material. A reasonable person, including Plaintiff, would find information about the risk of
6 grooming, sexual abuse, sexual exploitation, and other serious risks associated with the use of each
7 Defendant's app, to be important when deciding whether to allow children to use it.

8 215. Each Defendant intended to deceive the public, users, and their parents, including
9 Plaintiff, by making misrepresentations and concealing the defects in the design of its app, which
10 made the app unsafe.

11 216. As a direct and proximate result of each Defendant's concealment of material
12 information and misrepresentations, Plaintiff was not aware and could not have been aware of the
13 facts that each Defendant concealed, and therefore justifiably and reasonably believed that each
14 Defendant's app was safe for children to use.

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

18 218. As a direct and proximate result of each Defendant's concealment of material
19 information and misrepresentations, Ethan sustained serious injuries and harm.

20 219. Each Defendant's concealment of material information and misrepresentations were
21 a substantial factor in causing harm to Ethan.

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

1 237. In addition, each Defendant owed a special relationship duty to Ethan to protect him
2 against harm caused by its app and employees or by other users. This special relationship duty is
3 based on the following:

- 4 a. As businesses, Defendants owe a duty to protect customers against reasonably
5 foreseeable criminal acts of third parties and other dangers known to Defendants
6 on their apps;
- 7 b. Ethan, as a minor, was vulnerable and dependent on Defendants for a safe
8 environment on their apps, and Defendants have superior ability and control to
9 provide that safety with respect to activities that they sponsor or control;
- 10 c. Ethan relied upon Defendants for protection against third-party misuse or
11 misconduct;
- 12 d. The special relationship Ethan had with Defendants substantially benefits
13 Defendants through profits and growth in users and user activity. Defendants
14 could not successfully operate without the growth in users and user activity
15 generated by children;
- 16 e. Defendants were far more to Ethan than a business. Defendants provided Ethan
17 with opportunities for social interaction and a discrete community of other users.
18 Ethan was dependent on Defendants to provide structure, guidance, and a safe
19 environment;
- 20 f. Defendants have superior control over their app environments and the ability to
21 protect their users. Defendants impose a variety of rules and restrictions to
22 supposedly maintain a safe and orderly environment. Defendants employ
23 internal staff to enforce these rules and restrictions and can monitor and
24 discipline users when necessary. Defendants have the power to influence
25 Ethan's values, consciousness, relationships, and behaviors; and
- 26 g. Defendants have voluntarily undertaken a responsibility to keep children safe
27 on their apps. As alleged above, Defendants have publicly stated that they take
28

1 steps to keep children safe on their apps and therefore have undertaken a duty
2 to act reasonably in taking such steps.

3 238. Ethan was a foreseeable user of each Defendant's app.

4 239. Each Defendant knew that minors such as Ethan would use its app.

5 240. Each Defendant invited, solicited, encouraged, or reasonably should have foreseen
6 the fact, extent, and manner of Ethan's use of its app.

7 241. Each Defendant knew or, by the exercise of reasonable care, should have known,
8 that the reasonably foreseeable use of its respective app (as developed, set up, managed,
9 maintained, supervised, and operated by that Defendant) was dangerous, harmful, and injurious
10 when used by youth such as Ethan in a reasonably foreseeable manner.

11 242. At all relevant times, each Defendant knew or, by the exercise of reasonable care,
12 should have known that its respective app (as developed, set up, managed, maintained, supervised,
13 and operated by that Defendant) posed unreasonable risks of harm to youth such as Ethan, which
14 risks were known and knowable, including in light of the internal data and knowledge each
15 Defendant had regarding its app.

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

25 244. Each Defendant's conduct was closely connected to Ethan's injuries, which were
26 highly certain to occur, as evidenced by the significance of Ethan's injuries.

27 245. Each Defendant could have avoided Ethan's injuries with minimal cost, including,
28 for example, by not including certain features in its respective app which harmed Ethan.

1 246. Imposing a duty on Defendants would benefit the community at large.

2 247. Imposing a duty on Defendants would not be burdensome to them because they have
3 the technological and financial means to avoid the risks of harm to Ethan.

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

8 249. Each Defendant breached its duties of care owed to than through its affirmative
9 malfeasance, actions, business decisions, and policies in the development, set up, management,
10 maintenance, operation, marketing, advertising, promotion, supervision, and control of its
11 respective app. These breaches are based on Defendants' own actions in managing their own apps
12 made available to the public, independent of any actions taken by a third party. Those breaches
13 include but are not limited to:

14 a. Including features in their apps that, as described above, are currently structured
15 and operated in a manner that unreasonably creates or increases the foreseeable
16 risk of grooming, sexual abuse, and sexual exploitation to youth, including
17 Ethan;

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

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- 1 c. Maintaining unreasonably dangerous features in their apps after notice that such
- 2 features, as structured and operated, posed a foreseeable risk of harm to the
- 3 physical and mental health and well-being of youth users;
- 4 d. Facilitating unsupervised and/or hidden use of their respective apps by youth,
- 5 including by adopting protocols that allow youth users to change their own
- 6 safety settings or parental controls, and create multiple and private accounts; and
- 7 e. Inviting children on their apps and marketing to children when Defendants knew
- 8 that their apps, as designed, were not safe for children.

9 250. Each Defendant breached its duties of care owed to Ethan through its nonfeasance,
10 failure to act, and omissions in the development, setup, management, maintenance, operation,
11 marketing, advertising, promotion, supervision, and control of its respective app. These breaches
12 are based on Defendants' own actions in managing their own apps made available to the public,
13 independent of any actions taken by a third party. Those breaches include but are not limited to:

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

- 1 j. Failing to implement reasonably available means to monitor for, report, and
- 2 prevent the use of their apps by sexual predators to victimize, abuse, and exploit
- 3 youth users;
- 4 k. Failing to provide effective mechanisms for youth users and their
- 5 parents/guardians to report abuse or misuse of their apps;
- 6 l. Failing to implement effective protocols to verify ages and identity of all users;
- 7 m. Failing to place reasonable age restrictions on their apps;
- 8 n. Failing to separate adults from children on the apps by, for example, creating
- 9 separate apps for children;
- 10 o. Failing to adequately fund their trust and safety programs; and
- 11 p. Others as set forth herein.

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

15 252. At all relevant times, Ethan used each Defendant's app in the manner in which it
16 was intended to be used.

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

23 254. Each Defendant's breach of one or more of its duties was a substantial factor in
24 causing harms and injuries to Ethan.

25 255. Ethan was injured from using both of Defendants' defective apps through no fault
26 of his own. The fact that Ethan was injured by using both of Defendants' apps means that
27 Defendants are each jointly and severally responsible for the injuries caused by any one of
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1 Defendants' apps and the burden shifts to Defendants to identify alternative causes of the alleged
2 injuries and apportion responsibility for the alleged injuries.

3 256. The nature of the fraudulent and unlawful acts that created safety concerns for Ethan
4 are not the type of risks that are immediately apparent from using Defendants' apps.

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

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

13 **FOURTH CAUSE OF ACTION**

14 **NEGLIGENCE – FAILURE TO WARN**

15 **(By Plaintiff Against Each Defendant)**

16 259. Plaintiff incorporates each and every factual allegation set forth above.

17 260. This claim is brought against Defendants Roblox and Discord.

18 261. At all relevant times, each Defendant designed, developed, managed, operated,
19 tested, produced, labeled, marketed, advertised, promoted, controlled, sold, supplied, distributed,
20 and benefited from its app used by Ethan.

21 262. Ethan was a foreseeable user of each Defendant's app.

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

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

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

5 265. Had Ethan received proper or adequate warnings about the risks of each Defendant's
6 app, Ethan would have heeded such warnings.

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

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

16 268. In addition, as described above, each Defendant owed a special relationship duty to
17 Ethan to protect him against harm caused by its app and employees or by other users.

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

24 270. Each Defendant breached its duty by failing to use reasonable care in providing
25 adequate warnings to Ethan, such as failing to notify parents and the general public of the following,
26 among others:

- 27 a. Defendants fail to require that children have parental approval before signing up
28 for an account;

- b. Defendants fail to screen users before allowing them on their apps;
- c. New users of Defendants’ apps can identify themselves as minors, begin to use the app, and do so indefinitely, without ever receiving a safety warning, and without ever having to provide information so that Defendants can warn the users’ parents or guardians;
- d. Defendants’ apps’ default safety settings allow adults and other strangers’ accounts to find, “friend,” and communicate with children’s accounts;
- e. Defendants’ parental control settings allow children to modify their own parental control settings;
- f. Defendants’ platforms recommend that adult users and other strangers “friend” and contact child accounts;
- g. Defendants fail to block the IP and MAC addresses of known abusers;
- h. Adult predators use Defendants’ apps to target children for sexual exploitation, sextortion, and CSAM;
- i. Defendants’ apps enable and increase risk of exposure to predators and can result in grooming, sexual abuse, and sexual exploitation, as well as their resultant physical and mental injuries;
- j. Sexual predators use Robux to coerce children into sending them nude photos or engaging in other types of sexually explicit behavior;
- k. Usage of Defendants’ apps can increase risky and uninhibited behavior in children, making them easier targets to adult predators for sexual exploitation, sextortion, and CSAM;
- l. Usage of Defendants’ apps can normalize abuse and pornography, leading children to abuse other children either contemporaneously or later when the children are older;
- m. The likelihood and severity of harm is greater for children;
- n. The likelihood and intensity of these harmful effects is exacerbated by the interaction of each app’s features with one another;

- 1 o. Defendants fail to verify ages, allowing adult predators to pose as children on
- 2 Defendants' apps;
- 3 p. Defendants' failure to verify ages allows children to bypass parental controls,
- 4 safety features, and default settings; and
- 5 q. Others as set forth herein.

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

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

11 273. As a direct and proximate result of each Defendant's breach of its duty to provide
12 adequate warnings, Ethan was harmed and sustained the injuries set forth herein. Each Defendant's
13 failure to provide adequate and sufficient warnings was a substantial factor in causing the harms to
14 Ethan.

15 274. Ethan was injured from using both of Defendants' defective apps through no fault
16 of his own. The fact that Ethan was injured by using both of Defendants' apps means that
17 Defendants are each jointly and severally responsible for the injuries caused by any one of
18 Defendants' apps and the burden shifts to Defendants to identify alternative causes of the alleged
19 injuries and apportion responsibility for the alleged injuries.

20 275. The nature of the fraudulent and unlawful acts that created safety concerns for Ethan
21 are not the type of risks that are immediately apparent from using Defendants' apps.

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

28

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

6 286. Ethan was a foreseeable user of each Defendant’s app.

7 287. Each Defendant knew that minors such as Ethan would use its app.

8 288. Each Defendant breached its respective duty in designing its app.

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

12 290. Each Defendant breached its respective duty by designing an app that was less safe
13 to use than an ordinary consumer would expect when used in an intended and reasonably
14 foreseeable manner.

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

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

- 26 a. Requiring children have parental approval and a parent’s email address to sign-
27 up for an account;
- 28 b. Effective parental controls;

- c. Effective parental notifications, including notifying parents any time a child messages another user, particularly an adult user, or notifying parents when children interact with accounts that have been blocked by other users or suspended in the past, among other controls;
- d. Setting default safety settings to the most protective options, including blocking direct messaging between child and adult users, or only allowing messaging between adult users and a child with the parent's explicit permission to message the adult user;
- e. Requiring adults to provide a phone number when signing up for an account;
- f. Pop-up safety notices within chats and games to warn users about inappropriate behavior;
- g. Preventing strangers from sending Robux to child accounts, and preventing children from sending Robux to strangers' accounts;
- h. Banning IP and MAC addresses of accounts associated with known abusers;
- i. Controlled chat option;
- j. Providing a transcript of a child's communications to the parent;
- k. Implementing reporting protocols to allow users or visitors of Defendants' apps to report CSAM and adult predator accounts specifically without the need to create or log in to the apps prior to reporting;
- l. Robust age and identity verification;
- m. Reasonable age restrictions;
- n. Separating adults from children by, for example, creating separate apps for children; and
- o. Others as set forth herein.

293. Alternative designs that would reduce the dangerous features of Defendants' respective apps were available, would have served effectively the same purpose as Defendants' defectively designed apps, and would have reduced the gravity and severity of danger each Defendant's app posed minor users.

1 303. Each Defendant rendered parental control services and account safety services to
2 Plaintiff.

3 304. Defendants made numerous statements, as outlined above, claiming in substance
4 that their parental controls and account safety services were highly effective at protecting users
5 from the type of harm that Ethan suffered.

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

8 306. Each Defendant's conduct was closely connected to Ethan's injuries, which were
9 highly certain to occur, as evidenced by the significance of Ethan's injuries.

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

14 308. Imposing a duty on Defendants would benefit the community at large.

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

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

20 311. Plaintiff relied on each Defendant exercising reasonable care in undertaking to
21 render parental control and account safety services.

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

25 313. Each Defendant failed to exercise reasonable care in rendering these parental control
26 and account safety services.

27 314. Each Defendant's failure to exercise reasonable care increased the risk of and was
28 a substantial factor in causing harm to Ethan.

1 324. These products were designed, manufactured, maintained, controlled, and
2 distributed from the respective California headquarters of each Defendant.

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

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

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

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

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

18 330. Ethan used these products as intended, and each Defendant knew or, by the exercise
19 of reasonable care, should have known that Ethan would use these products without inspection for
20 its dangerous nature.

21 331. Each Defendant defectively designed its product to appeal to adult predators by
22 making it easy to find children and enabled their contact, grooming, sexual exploitation, and sexual
23 abuse of children, including Ethan.

24 332. Each Defendant failed to test the safety of the features it developed and implemented
25 for use on its product. When each Defendant did perform some product testing and had knowledge
26 of ongoing harm, it failed to adequately remedy its product’s defects or warn Ethan.

27 333. Each Defendant’s product is defective in design and poses a substantial likelihood
28 of harm for the reasons set forth herein, because the products fail to meet the safety expectations

1 of ordinary consumers when used in an intended or reasonably foreseeable manner, and because
2 the products are less safe than an ordinary consumer would expect when used in such a manner.
3 Children and teenagers are among the ordinary consumers of Defendants' products. Indeed, each
4 Defendant markets, promotes, and advertises its respective product to pre-teen and young
5 consumers. Pre-teen and young consumers, and their parents and guardians, do not expect
6 Defendants' products to expose them to predators when the products are used in their intended
7 manner by their intended audience. They do not expect the features embedded by Defendants in
8 their products to make it easy for child predators to sign-up for accounts and find children, groom
9 children, and sexually exploit children. They do not expect Defendants' revenue and profits to be
10 directly tied to predators' extortion of children.

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

19 335. The risks inherent in the design of each Defendant's product significantly outweigh
20 any benefits of such design.

21 336. Defendants could have utilized cost-effective, reasonably feasible alternative
22 designs, including changes to the problematic features described above, to minimize the harms
23 described herein, including, but not limited to:

- 24 a. Requiring children have parental approval and a parent's email address to sign-
25 up for an account;
- 26 b. Effective parental controls;
- 27 c. Effective parental notifications, including notifying parents any time a child
28 messages another user, particularly an adult user, or notifying parents when

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- children interact with accounts that have been blocked by other users or suspended in the past, among other controls;
- d. Setting default safety settings to the most protective options, including blocking direct messaging between child and adult users, or only allowing messaging between adult users and a child with the parent’s explicit permission to message the adult user;
- e. Requiring adults to provide a phone number when signing up for an account;
- f. Pop-up safety notices within chats and games to warn users about inappropriate behavior;
- g. Preventing strangers from sending Robux to child accounts, and preventing children from sending Robux to strangers’ accounts;
- h. Banning IP and MAC addresses of accounts associated with known abusers;
- i. Controlled chat option;
- j. Providing a transcript of a child’s communications to the parent;
- k. Implementing reporting protocols to allow users or visitors of Defendants’ products to report child sex abuse material and adult predator accounts specifically without the need to create or log in to the products prior to reporting;
- l. Robust age and identity verification;
- m. Reasonable age restrictions;
- n. Separating adults from children by, for example, creating separate apps for children; and
- o. Others as set forth herein.

337. Alternative designs were available that would prevent child predators from finding, grooming, and exploiting children, and which would have served effectively the same purpose of Defendants’ products while reducing the gravity and severity of danger posed by those products’ defects.

338. Ethan used Defendants’ respective products as intended or in reasonably foreseeable ways.

1 339. The physical, emotional, and economic injuries of Ethan were reasonably
2 foreseeable to Defendants at the time of their products' development, design, advertising,
3 marketing, promotion, and distribution.

4 340. Each Defendant's product was defective and unreasonably dangerous when it left
5 each Defendant's respective possession and control. The defects continued to exist through the
6 products' distribution to and use by consumers, including Ethan, who used the products without
7 any substantial change in the products' condition.

8 341. As manufacturers, designers and sellers, each Defendant had a duty to inform itself
9 with the best knowledge of the risks and the defects of its product and each Defendant had such
10 knowledge. Their victims, including Ethan, were powerless to protect themselves against
11 unknown harms, and Defendants should bear the costs of their injuries.

12 342. Ethan was injured as a direct and proximate result of each Defendant's respective
13 defective designs as described herein. The defective design of the products used by Ethan was a
14 substantial factor in causing harms to Ethan.

15 343. As a direct and proximate result of each Defendant's respective product's defective
16 design, Ethan suffered serious and dangerous injuries.

17 344. Ethan was injured from using both of Defendants' defective products through no
18 fault of his own. The fact that Ethan was injured by using both of Defendants' products means
19 that Defendants are each jointly and severally responsible for the injuries caused by any one of
20 Defendants' products and the burden shifts to Defendants to identify alternative causes of the
21 alleged injuries and apportion responsibility for the alleged injuries.

22 345. The nature of the fraudulent and unlawful acts that created safety concerns for Ethan
23 are not the type of risks that are immediately apparent from using Defendants' respective products.

24 346. The conduct of each Defendant, as described above, was intentional, fraudulent,
25 willful, wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and
26 displayed an entire want of care and a conscious and depraved indifference to the consequences
27 of its conduct, including to the health, safety, and welfare of its customers, and warrants an award
28

1 of punitive damages in an amount sufficient to punish each Defendant and deter others from like
2 conduct.

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

6 **EIGHTH CAUSE OF ACTION**

7 **STRICT LIABILITY – FAILURE TO WARN**

8 **(By Plaintiff Against Each Defendant)**

9 348. Plaintiff incorporates each and every factual allegation set forth above.

10 349. This claim is brought against Defendants Roblox and Discord.

11 350. At all relevant times, each Defendant designed, developed, managed, operated,
12 tested, produced, labeled, marketed, advertised, promoted, controlled, sold, supplied, distributed,
13 and benefitted from its product used by Ethan.

14 351. These products were designed, manufactured, maintained, controlled and
15 distributed from the respective California headquarters of each Defendant.

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

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

22 354. Each Defendant sold and distributed its respective product to Ethan in a defective
23 and unreasonably dangerous condition by failing to adequately warn about the risk of harm to youth
24 as described herein, including a risk of grooming, sexual abuse, and sexual exploitation, which can
25 lead to a cascade of harms. Those harms include but are not limited to physical injury, damage to
26 self-worth, stigma and social isolation, reduced academic performance, increased risky behavior,
27 susceptibility to future sexual exploitation, attachment issues, identity confusion, and profound
28

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

3 355. Defendants were in the best position to know the dangers their products posed to
4 consumers, including Ethan, as they had superior knowledge of the risks and dangers posed by
5 their products and had exclusive knowledge of these risks at the time of development, design,
6 marketing, promotion, advertising and distribution. Defendants had exclusive control of their
7 products at all times relevant to this litigation.

8 356. Each Defendant's respective product is dangerous, to an extent beyond that
9 contemplated by the ordinary user who used Defendants' products, because they enable predators
10 to find, groom, abuse, and exploit children.

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

15 358. These risks were known and knowable in light of Defendants' own internal data and
16 knowledge regarding their products at the time of the products' development, design, marketing,
17 promotion, advertising, and distribution to Ethan.

18 359. Defendants' products are defective and unreasonably dangerous because, among
19 other reasons described herein, each Defendant failed to exercise reasonable care to inform users
20 that, among other things:

- 21 a. Sexual predators use Defendants' products to find, contact, groom and abuse
22 children with alarming frequency;
- 23 b. Sexual predators use Defendants' products to solicit, produce, and distribute
24 CSAM with alarming frequency;
- 25 c. Sexual predators target young children for CSAM on Defendants' products with
26 alarming frequency;
- 27 d. Sexual predators use Robux to coerce children into sending them nude photos
28 or engaging in other types of sexually explicit behavior;

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

360. Ethan was a foreseeable user of each Defendant's product.

361. Ordinary minor users would not have recognized the potential risks of Defendants' products when used in a manner reasonably foreseeable to Defendants.

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

1 and will continue to suffer from loss of Ethan’s love, companionship, comfort, affection, society,
2 and moral support, loss of financial support, household services, and other economic contributions
3 the Ethan would have provided, and funeral and burial expenses personally incurred by Plaintiff.

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

7 **TENTH CAUSE OF ACTION**

8 **SURVIVAL ACTION (CCP § 377.30)**

9 **(By Plaintiff, as Successor-in-Interest, Against Each Defendant)**

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

11 374. This claim is brought against Defendants Roblox and Discord.

12 375. Pursuant to California Code of Civil Procedure §§ 377.30 and 377.32, Plaintiff
13 brings this cause of action on behalf of Ethan’s estate as successor-in-interest.

14 376. Plaintiff has executed a Declaration of Successor-In-Interest in compliance with
15 CCP § 377.32, which is attached hereto as Exhibit A.

16 377. Prior to death, Ethan would have had causes of action against Defendants for
17 injuries including, but not limited to, physical pain, emotional suffering, and economic losses.
18 Plaintiff seeks to recover damages that Ethan would have been entitled to had he survived,
19 including, but not limited to, pre-death pain and suffering and disfigurement (pursuant to CCP §
20 377.34(b)), medical expenses and treatment costs, lost wages or loss of earning capacity, and
21 punitive damages pursuant to California Civil Code § 3294 due to Defendants’ malicious,
22 oppressive, and fraudulent conduct.

23 378. Plaintiff has executed a declaration in support of recovery of pain, suffering, and
24 disfigurement pursuant to California Code of Civil Procedure § 377.34(b), which is attached hereto
25 as Exhibit B.

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

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

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

7 **VIII. PRAYER FOR RELIEF**

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

- 10 1. Past, present, and future general damages, the exact amount of which has yet to be
11 ascertained, in an amount which will confirm to proof at time of trial, to compensate
12 Plaintiff for injuries sustained as a result of the use of each Defendant's product,
13 including but not limited to physical pain and suffering, mental anguish, loss of
14 enjoyment of life, emotional distress, and expenses for medical treatments;
- 15 2. Past, present, and future economic and special damages, according to proof at the
16 time of trial;
- 17 3. Impaired earning capacity according to proof at the time of trial;
- 18 4. Medical expenses, past and future, according to proof at the time of trial;
- 19 5. Funeral expenses and other special damages according to proof at time of trial;
- 20 6. Punitive or exemplary damages according to proof at the time of trial;
- 21 7. All damages available for wrongful death and survival;
- 22 8. Attorneys' fees;
- 23 9. For costs of suit incurred herein;
- 24 10. Pre-judgment and post-judgment interest as provided by law;
- 25 11. For nonmonetary injunctive relief; and
- 26 12. For such other and further relief as the Court may deem just and proper.


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

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

3
4 Date: September 12, 2025

Respectfully submitted,

5 **ANAPOL WEISS**

6
7 By: 
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Attorneys for Plaintiff

**Pro Hac Vice motions forthcoming*

EXHIBIT A

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

REBECCA DALLAS, individually and as
successor-in-interest to ETHAN
DALLAS,

Plaintiff,

v.

ROBLOX CORPORATION; DISCORD
INC.; and DOES 1-50, inclusive,

Defendants.

Case No.:

**DECLARATION OF SUCCESSOR-IN-
INTEREST PURSUANT TO CCP § 377.32**

1 I, Rebecca Dallas, declare as follows:

2 1. I am over the age of 18 years. I have personal knowledge of the facts contained in
3 this declaration, and if called as a witness, I could and would testify competently to the truth of
4 the facts stated herein.

5 2. I am the biological mother of Ethan Dallas ("Decedent").

6 3. Decedent died on April 3, 2024, in Santee, San Diego County, California.

7 4. No proceeding is currently pending in California for the administration of the
8 estate of Decedent.

9 5. I am the successor-in-interest to Decedent, as defined in California Code of Civil
10 Procedure § 377.11.

11 6. I succeed in Decedent's interest in the action against the defendants named in this
12 lawsuit and am authorized to act on behalf of Decedent's estate with respect to these claims.


13 7. Decedent did not have a will.

14 8. Decedent's father, Wesley Dallas, is aware that this lawsuit is being brought and
15 has indicated that he does not wish to participate in the litigation. To my knowledge, no other
16 person has a superior right to commence this action or to be substituted for Decedent.

17 9. A certified copy of the death certificate for Ethan Dallas is attached hereto.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20 Executed on 9/9/2025 at Santee, San Diego County, California.

21 

22 By _____
23 Rebecca Dallas
24 Declarant
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CERTIFICATE OF DEATH

3202437006230

1. NAME OF DECEASED - FIRST NAME ETHAN		2. MIDDLE NAME AVERY		3. LAST PART OF NAME DALLAS	
4. DATE OF BIRTH 09/14/2008					
5. SEX M					
6. STATE OF BIRTH CA		7. SOCIAL SECURITY NUMBER 625-71-9723		8. MARITAL STATUS NEVER MARRIED	
9. DATE OF DEATH 04/03/2024		10. TIME OF DEATH FND		11. PLACE OF DEATH 0750	
12. RACE CAUCASIAN					
13. OCCUPATION STUDENT					
14. EDUCATION EDUCATION					
15. ADDRESS 8515 ATLAS VIEW DRIVE					
16. CITY SANTEE		17. COUNTY SAN DIEGO		18. ZIP CODE 92071	
19. STATE CA		20. DECEASED'S NAME RELATIONSHIP ERICA ROZOLSKY, AUNT			
21. ADDRESS OF SURVIVING SPouse/Next of Kin 6350 WEST DESERT INN ROAD APT 1068, LAS VEGAS, NV 89117					
22. NAME OF SURVIVING SPouse/Next of Kin WESLEY		23. MIDDLE NAME CHARLES		24. LAST PART OF NAME DALLAS	
25. NAME OF SURVIVING SPouse/Next of Kin REBECCA		26. MIDDLE NAME MELISSA		27. LAST PART OF NAME ROZOLSKY	
28. DATE OF DEATH 04/11/2024		29. PLACE OF DEATH AT SEA OFF THE COAST OF SAN DIEGO COUNTY			
30. TIME OF DEATH CREMATE/SCATTER AT SEA		31. SIGNATURE OF REGISTRAR NATHAN A SPENCER		32. LICENSE NUMBER EMB9730	
33. NAME OF PLACER FEATHERINGILL MORTUARY INC		34. IDENTIFICATION NUMBER FD1083		35. SIGNATURE OF LOCAL REGISTRAR WILMA WOOTEN MD	
36. DATE OF DEATH 04/06/2024		37. PLACE OF DEATH AT SEA OFF THE COAST OF SAN DIEGO COUNTY			
38. PLACE OF DEATH FOUND - HOME					
39. CITY SAN DIEGO		40. ADDRESS 8515 ATLAS VIEW DRIVE		41. ZIP CODE SANTEE	
42. MANNER OF DEATH HANGING					
43. SIGNATURE OF REGISTRAR MING					
44. LICENSE NUMBER 24-01028					
45. SIGNATURE OF LOCAL REGISTRAR WILMA WOOTEN MD					
46. DATE OF DEATH 04/06/2024					
47. PLACE OF DEATH HOME					
48. SIGNATURE OF LOCAL REGISTRAR JONATHAN LUCAS					
49. DATE OF DEATH 04/05/2024					
50. SIGNATURE OF LOCAL REGISTRAR JONATHAN LUCAS, DME					

County of San Diego - Health & Human Services Agency - 3800 Broadway Avenue, This is to certify that, if bearing the OFFICIAL SEAL OF THE STATE OF CALIFORNIA, the OFFICIAL SEAL OF SAN DIEGO COUNTY AND THEIR DEPARTMENT OF HEALTH SERVICES AN EMBOSSED stamp, this is a true copy of the ORIGINAL DOCUMENT FILED. This copy not valid unless prepared on registered bonds displaying seal and signature of Registrar.

Wilma J. Wooten M.D.

DATE ISSUED: 4/10/2024

WILMA J. WOOTEN, M.D., M.P.H.
REGISTERED NURSE
County of San Diego



EXHIBIT B

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

REBECCA DALLAS, individually and as
successor-in-interest to ETHAN
DALLAS,

Plaintiff,

v.

ROBLOX CORPORATION; DISCORD
INC.; and DOES 1-50, inclusive,

Defendants.

Case No.:

**DECLARATION RE: RECOVERY OF NON-
ECONOMIC DAMAGES PURSUANT TO
CCP § 377.34(b)**

1 I, Rebecca Dallas, declare as follows:

2 1. I am over the age of 18 years. I have personal knowledge of the facts contained in
3 this declaration, and if called as a witness, I could and would testify competently to the truth of
4 the facts stated herein.

5 2. I am the biological mother of Ethan Dallas ("Decedent") and the successor-in-
6 interest to his estate pursuant to California Code of Civil Procedure § 377.30 et seq.

7 3. Decedent died on April 3, 2024, which was on or after January 1, 2022.

8 4. This action is being commenced on or after January 1, 2022, and before January 1,
9 2026.

10 5. I am seeking to recover damages for Decedent's pain, suffering, and disfigurement
11 under the exception provided in California Code of Civil Procedure § 377.34(b).

12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

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15 Executed on 9/9/2025 at Santee, San Diego County, California.

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By _____
Rebecca Dallas
Declarant

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