

IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

FILED
DISTRICT COURT

CLEVELAND COUNTY, OKLAHOMA

May 14, 2026 10:42 AM

MARILYN WILLIAMS, COURT CLERK

Case Number CJ-2026-810

STATE OF OKLAHOMA, *ex rel.*
GENTNER DRUMMOND,
ATTORNEY GENERAL OF
OKLAHOMA,

Plaintiff,

v.

ROBLOX, INC.;

Defendant.

JURY TRIAL DEMANDED

Case No. _____

PETITION

The State of Oklahoma, by and through Attorney General Gentner Drummond (“Plaintiff” or “Attorney General”), brings this action pursuant to the Oklahoma Consumer Protection Act, 15 O.S. §§ 751 to 763 (“OCA”) against Defendant Roblox Corporation (“Roblox” or “Defendant”) to stop Defendant’s continued misrepresentations of its platform’s safety, reckless platform designs, and the resulting harm to minor users in the State of Oklahoma.

SUMMARY OF THE CASE

1. Roblox is an online gaming platform that, in its 20 years of existence, has established itself as the most popular children’s gaming platform in history. As many as two-thirds of all children ages 9 to 12 in the United States have Roblox accounts, and the platform is similarly popular with U.S. teens.¹ As Roblox grew its audience, Defendant repeatedly assured parents and the public that Roblox is safe for minors.

2. But this cannot be further from the truth: Defendant has long known that Roblox is a hunting ground for child predators, and this is because Defendant consistently sacrificed child safety in favor of exponential user growth and attendant profit.

3. Indeed, in order to ensure continued growth, Defendant repeatedly failed to implement basic safety controls to protect children, choosing instead to make affirmative, material misrepresentations and selective omissions which prevented, and continues to prevent, Roblox users and their parents from learning of the dangers inherent on the Roblox platform.

4. When pressed on Roblox’s predator problem—shortly before the filing of this lawsuit—Defendant’s CEO, Dave Baszucki, stated, “*We think of it not necessarily just as a problem, but an opportunity as well.*”²

5. But these dangers are not opportunities. They range from child predators acting alone to international organizations—linked with terrorist groups—that are dedicated to child sexual exploitation and self-harm.

6. For two decades, Defendant could have placed barriers between its vulnerable child user base (and the parents and guardians of that user base) and the monstrous criminals lurking on Roblox. It did not.

¹ Olga Kharif, *Kids Flock to Roblox for Parties and Playdates During Lockdown*, Bloomberg (Apr. 15, 2020) <https://www.bloomberg.com/news/articles/2020-04-15/kids-flock-to-roblox-for-parties-and-playdates-during-lockdown> (last accessed May 12, 2026)

² Kevin Roose, et al., *We Asked Roblox’s C.E.O. About Child Safety. It Got Tense.*, N.Y. Times (Nov. 21, 2025), <https://www.nytimes.com/2025/11/21/podcasts/hardfork-roblox-child-safety.html> (last updated May 11, 2026) (last accessed May 12, 2026) (emphasis added).

7. Most obviously, Roblox could require informed parental consent prior to allowing minor children to establish an account on Roblox. Instead, Roblox continues to allow children—sometimes as young as 5 years old—to create accounts without any form of identity verification, nor with any indicia of parental consent. Worse still, these lax account-creation protocols allow predators, often posing as children, to create multiple accounts through which they are able to meet, befriend, groom and/or lure their victims. And, if the accounts of these malicious actors are ever discovered, such predators can easily and immediately create *new* accounts with different false identities from which to continue targeting children.

8. These are not simply failures on Defendant’s part; they are abdications of responsibility. They are intentional, material, preventable, and unconscionable. For years, Defendant knowingly enabled and facilitated the systemic sexual exploitation and abuse of children across Oklahoma and elsewhere in the United States. Defendant’s wanton disregard for children’s safety has permitted and perpetuated an online environment in which child predators thrive, thus directly contributing to the widespread victimization of Oklahoma’s children.

9. To illustrate the severity of the issue: there is significant documentation of the extremist organization known as “764”, an international Satanist cult devoted to the sexual exploitation of children, using Roblox—alongside other platforms—as a tool to target, manipulate, and exploit children through recruitment, grooming, sextortion, threats, and even murder plots.³ Reports of children being groomed through Roblox and later abducted have become increasingly common in recent years.⁴

10. As recently as September 2025, an Oklahoma mother brought suit against Defendant due to its failure to protect her daughter from a sexual predator who groomed the child at the age of 12.⁵ The perpetrator was a man in his mid-40s who utilized Defendant’s defective security protocols, including but not limited to its defective account creation process, to pose as a 15-year-old boy and then used in-game currency called “Robux” to earn the girl’s trust and entice her to send sexually explicit photos and videos.⁶

³ Shawn Boburg, et al., *On popular online platforms, predatory groups coerce children into self-harm*, Washington Post, (Mar. 13, 2024). <https://www.washingtonpost.com/investigations/interactive/2024/764-predator-discord-telegram/> (last accessed May 12, 2026).

⁴ See, e.g. Viola Flowers, *California man accused of kidnapping 10-year-old he met on Roblox*, NBC News (Apr. 23, 2025), <https://www.nbcnews.com/news/us-news/kidnapping-roblox-rcna201795> (last accessed May 12, 2026).

⁵ Lisa Monahan, *Oklahoma mother sues Roblox over ‘sextortion’ of 12-year-old daughter*, News9 (Sept. 3, 2025), <https://www.news9.com/story/68b88a708f876360163a364a/oklahoma-mother-sues-roblox-over-sextortion-of-12-year-old-daughter> (last accessed May 12, 2026).

⁶ *Id.*

11. Following the announcement of this child's lawsuit, another Oklahoma mother filed a lawsuit on behalf of her son, who similarly was victimized on Roblox.⁷

12. The manner in which the Roblox designed and manages its platform prevents parents and guardians from even being aware of their children's activity on the platform, let alone being able to keep them safe. Roblox knowingly and recklessly exposes children to dangerous adults.⁸ Unsurprisingly then, encounters involving violence and sexual content are far too common—parents have reported instances of children being approached by strangers through third-party messaging applications that appear seamlessly integrated into a game,⁹ chat exchanges containing adult themes such as violence and rape,¹⁰ children's avatars being subjected to violent sexual acts by other players,¹¹ and children entering areas of the platform dedicated to virtual sexual activity, including spaces featuring unclothed avatars.¹²

13. Defendant refuses to meaningfully protect children from predatory threats on Roblox, similarly refuses to warn parents and the public of the foreseeable dangers posed by the platform, and actively and materially misrepresents the expectation and promise of children's safety while on the platform. This unconscionable conduct has directly facilitated the widespread sexual exploitation of minors and inflicted severe, lasting harm upon the children of Oklahoma.

14. Taken individually and together over the past two decades, Defendant's actions and omissions constitute both unfair and deceptive trade practices that are prohibited by the OCPA.

PARTIES

15. Plaintiff is the State of Oklahoma. This enforcement action is brought by and through Attorney General Gentner Drummond pursuant to the authority conferred by the OCPA.

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

⁷ *Second Oklahoma family suing gaming app "Roblox"*, KFOR Oklahoma's News 4 (Nov. 23, 2025), <https://www.youtube.com/watch?v=vQowCXU5T4I> (last accessed May 12, 2026).

⁸ Burt Helm, *Sex, lies, and video games: Inside Roblox's war on porn*, Fast Company (Aug. 19, 2020), <https://www.fastcompany.com/90539906/sex-lies-and-video-games-inside-roblox-war-on-porn> (last accessed May 12, 2026).

⁹ Stacey Dittman, *Parent Alert: Is Roblox Safe for Kids? Watch Out for These 4 Dangers*, Defend Young Minds (July 23, 2019), <https://www.defendyoungminds.com/post/is-roblox-safe-for-kids-4-dangers> (last accessed May 12, 2026).

¹⁰ Rachel Stonehouse, *Roblox: 'I thought he was playing an innocent game'*, BBC (May 29, 2019), <https://www.bbc.com/news/technology-48450604> (last accessed May 12, 2026).

¹¹ Sarah Perez, *Roblox responds to the hack that allowed a child's avatar to be raped in its game*, TechCrunch (July 18, 2018), <https://techcrunch.com/2018/07/18/roblox-responds-to-the-hack-that-allowed-a-childs-avatar-to-be-raped-in-its-game/> (last accessed May 12, 2026).

¹² Nina Young, *Mum horrified after six-year-old stumbles onto explicit Roblox 'sex room'*, KidSpot (June 3, 2018), <https://www.kidspot.com.au/parenting/mum-horrified-after-six-year-old-stumbles-onto-explicit-roblox-sex-room/news-story/74f9543444462d24706a639dd8336834> (last accessed May 12, 2026).

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

JURISDICTION AND VENUE

18. By this Petition, Plaintiff asserts causes of action and seeks remedies based exclusively on Oklahoma statutory law.

19. This Petition does not confer diversity jurisdiction upon federal courts pursuant to 28 U.S.C. § 1332, as Oklahoma is not a citizen of any state and this action is not subject to the jurisdictional provision of the Class Action Fairness Act of 2005, 28 U.S.C. § 1332(d).¹³ Federal question subject matter jurisdiction under 28 U.S.C. § 1331 is not invoked by this Petition. Nowhere does Plaintiff plead, expressly or implicitly, any cause of action or request any remedy that necessarily arises under federal law.

20. The issues presented in the allegations of this Petition do not implicate any substantial federal issues and do not turn on the necessary interpretation of federal law. No federal issue is important to the federal system as a whole under the criteria set by the Supreme Court in *Gunn v. Minton*, 568 U.S. 251, 260–61 (2013) (e.g., federal tax collection seizures, federal government bonds). Specifically, the causes of action asserted, and the remedies sought herein, are founded upon the positive statutory, common, and/or decisional laws of Oklahoma. Further, the assertion of federal jurisdiction over the claims made herein would improperly disturb the congressionally approved balance of federal and state responsibilities. Accordingly, any exercise of federal jurisdiction is without basis in law or fact.

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

22. As a court of general jurisdiction, the District Court is authorized to hear this matter.

¹³ See, e.g. *Postal Tel. Cable Co. v. Alabama*, 155 U.S. 482, 487 (1894) (“A State is not a citizen. And under the judiciary acts of the United States it is well settled that a suit between a State and a citizen or a corporation of another State is not between citizens of different States . . .”).

23. This Court has general personal jurisdiction over Defendant pursuant to 12 O.S. § 2004 because of its contacts in Oklahoma. As described more fully below, Defendant purposefully conducts business in Oklahoma by marketing (1) virtual Roblox goods, and (2) physical Roblox toys, gift cards, and other merchandise to children in Oklahoma. This affirmative conduct occurred—and continues to occur—both through online retailers (including the Roblox platform, itself) and through brick-and-mortar retailers which are physically located in Oklahoma and which sell Roblox merchandise.

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



Fig. 1 – Roblox Gift Card (Front) for Sale at a Walmart located at 9011 NE 23rd Street, Midwest City, Oklahoma 73110.

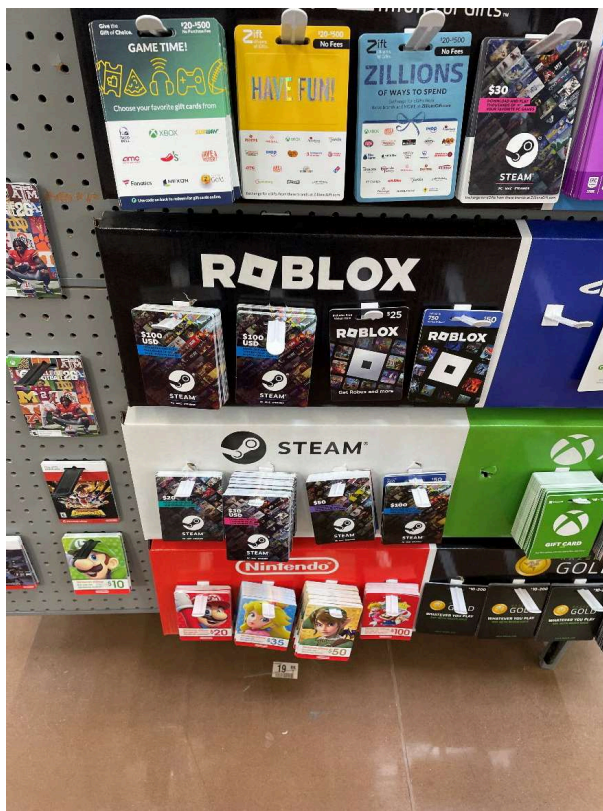


Fig. 2 – Roblox Gift Cards for Sale at a Walmart located at 5401 Tinker Diagonal, Del City, Oklahoma 73115.



Fig. 3 – Roblox Gift Card (Back) for Sale at a Walmart located at 5401 Tinker Diagonal, Del City, Oklahoma 73115 .



Fig. 4 – Roblox Gift Cards for Sale at a Walmart located at 9011 NE 23rd Street, Midwest City, Oklahoma 73110.

25. According to Roblox’s website, physical Roblox gift cards are carried at retailers in Oklahoma such as Walmart, Target, Walgreens, CVS, Best Buy, 7-Eleven, Dollar General, Family Dollar, GameStop, and Albertsons.¹⁴

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

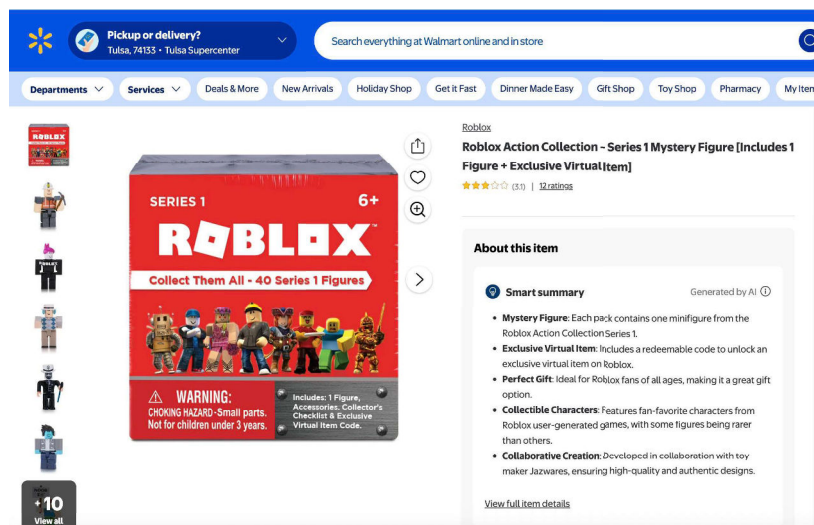


Fig. 5 – Roblox Action Figures for Sale at a Tulsa, Oklahoma Walmart

¹⁴ Enjoy up to 25% more Robux, Roblox, <https://www.roblox.com/giftcards-retailers-us?location=us> (last accessed May 12, 2026).

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

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

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

30. In addition, this Court may properly exercise specific personal jurisdiction over Defendant because Defendant has performed acts by which it purposefully has availed itself of the privilege of conducting activities within Oklahoma, and the conduct at issue in this lawsuit arises from or relates to that purposeful availment. Roblox has entered into contracts with Oklahomans, directed marketing efforts towards Oklahomans, made public misstatements and omissions regarding the safety of its products to Oklahomans, hired lobbyists within Oklahoma, and profited from the sale of both retail items and Robux it directed to Oklahomans. Roblox chose to exploit the Oklahoma market to sell its products, and it is therefore not unreasonable to subject Roblox to suit in Oklahoma.

31. Pursuant to 12 O.S. § 137, venue is proper in Cleveland County because Cleveland County is a county where the alleged misconduct occurred and where Defendant has conducted or transacted business.

FACTUAL ALLEGATIONS

I. Roblox Is the Dominant Online Platform for Young Children in the United States.

A. Roblox, Generally

32. Roblox is a digital gaming platform accessible to children through a downloadable mobile application, a dedicated website (www.roblox.com), and gaming consoles such as Microsoft's Xbox. A Roblox account can easily be set up by a child in a matter of minutes without the need for (or knowledge of) a parent, and children as young as six years old have established accounts.

33. The platform and its library of games are available at no cost to users. Roblox generates revenue through microtransactions within games, licensing arrangements, and the sale of Robux gift cards.

34. At present, there are more than seven million¹⁵ games—also referred to as “experiences”—available to play on the Roblox platform. Defendant does not create most games/experiences on the Roblox platform. Instead, users create their own games using the coding tools and infrastructure designed and maintained by Defendant. Those users (often referred to as “developers”) then upload their games to the Roblox platform, at which point other users can play those games. Money is made through in-game purchases (facilitated by the virtual currency “Robux”), and the revenue is split between Roblox and the users/developers.¹⁶

35. Defendant explicitly designed Roblox to be an interactive experience. Roblox’s co-founder and CEO David Baszucki explained that his vision is for Roblox to bring about “the next phase of human interaction,” which he also has described as “an entirely new category of human coexperience.”¹⁷ Defendant has similarly explained that Roblox “operates a human co-experience platform . . . where users interact with each other to explore and develop immersive, user-generated, 3D experiences.”¹⁸

36. This means that users do not engage with the platform in isolation—rather, games are played simultaneously by large numbers of individuals from around the world, regardless of any prior relationship between them. Features such as in-game interactions, community hubs, direct messaging, and voice chat actively encourage socialization between users. As discussed in greater detail below, these functions, combined with Defendant's longstanding and continued failure to meaningfully address predatory conduct on the platform, have fostered a deeply dangerous environment for children—one that has led to sexual exploitation and violence.

B. Roblox’s In-Game Currency: Robux

37. The monetization of the Roblox platform is driven primarily by in-game purchases using Roblox's proprietary virtual currency, known as “Robux,” which can be obtained either

¹⁵ *One platform. Millions of ways to engage.*, Roblox, <https://corp.roblox.com/> (archived at Wayback Machine capture dated February 5, 2026, <https://web.archive.org/web/20260205235643/https://about.roblox.com/>) (last accessed May 12, 2026).

¹⁶ *Monetize Your Experiences*, Roblox, <https://create.roblox.com/docs/monetize-experiences> (last accessed May 12, 2026).

¹⁷ David Baszucki, *The CEO of Roblox on Scaling Community-Sourced Innovation*, Harv. Bus. Rev. Mag. (Mar.–Apr. 2022), <https://hbr.org/2022/03/the-ceo-of-roblox-on-scaling-community-sourced-innovation> (last accessed May 12, 2026).

¹⁸ Roblox Corp., *Q3 2021 Form 10-Q (Quarterly Report)* at 10, U.S. SEC (Nov. 9, 2021), <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ad69fbb0-a7b7-465b-942f-53206ff42303.pdf> (last accessed Mar. 13, 2026).

through the Roblox website or via physical gift-cards sold in stores and online.¹⁹ Once acquired, Robux can be spent in the Roblox Marketplace on a variety of offerings, including virtual characters, clothing, accessories, and more.²⁰

38. Robux typically cost anywhere from \$4.99 for 500 Robux, \$9.99 for 1,000 Robux, or more,²¹ and players can purchase them ad hoc, or receive Robux on a monthly basis with purchase of an optional Roblox subscription.²² Defendant generates almost all of its revenue through the sale of Robux, making \$4.9 billion in 2025 (a year-over-year growth of 36%).²³

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

39. Roblox reported 144 million daily active users (“DAUs”) in its final quarter of 2025—up 69% from one year prior.²⁴ By the end of 2025, Defendant announced that its Roblox platform “accounted for 3.4% of the global gaming content market, with even deeper penetration in the U.S.”²⁵

40. Over 60% of its users are identified as “school-going age,” and as early as 2021, during the worldwide COVID-19 pandemic, “Roblox host[ed] more students every month than *all* school-going children in the U.S., U.K., and Canada combined.”²⁶ Roblox similarly has reported that two-thirds of all U.S. children between 9 and 12 years old, and a third of those under the age of 16, play games on the Roblox platform.²⁷

41. As early as 2017, Roblox announced that it had become the “top online entertainment platform for both kids and teens,” with triple the amount of monthly visits by children under 13 (25.5 visits in December 2017) of its closest competitor, YouTube (with 7.9 visits in the same month); and roughly double the number of monthly visits for teens (26.9 visits

¹⁹ See paragraphs 23–27, *supra*; see also, *Buy Robux*, Roblox, <https://www.roblox.com/upgrades/robux> (last accessed May 12, 2026).

²⁰ *Marketplace*, Roblox, <https://www.roblox.com/catalog?Category=1&salesTypeFilter=1> (last visited May 12, 2026).

²¹ *Buy Robux*, Roblox, <https://www.roblox.com/upgrades/robux> (last accessed May 12, 2026).

²² *Roblox Plus*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/47967913158164-Roblox-Plus> (On April 30, 2026, Roblox launched a new “Roblox Plus” subscription service that it claims will soon allow subscribers to bundle their monthly subscription with a recurring allotment of either 500, 1000, or 2000 Robux.) (last accessed May 12, 2026); *Roblox Premium Membership*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/360024256251-Roblox-Premium-Membership> (While Roblox’s previous “Roblox Premium” subscription—which included monthly Robux stipends—is no longer available for purchase, users who were subscribed prior to April 30, 2026 will retain their existing subscriptions and continue to receive the monthly Robux stipend.) (last accessed May 12, 2026).

²³ *Shareholder Letter Q4 2025 at 2*, Roblox (Feb. 5, 2026), https://s27.q4cdn.com/984876518/files/doc_financials/2025/q4/Q4-2025-Shareholder-Letter.pdf (last accessed Mar. 13, 2026).

²⁴ *Id.* at 8.

²⁵ *Id.* at 2.

²⁶ Hamza Mudassir, *‘Roblox’ isn’t just a gaming company. It’s also the future of education*, Fast Company (March 29, 2021), <https://www.fastcompany.com/90619108/roblox-future-of-education> (last accessed May 12, 2026) (first emphasis omitted).

²⁷ Kharif, *supra* note 1.

for Roblox in December 2017 compared to 14.7 visits for YouTube in the same month).²⁸ The same document states that children under 13 spent 51.5 million hours on the platform in December 2017, compared to only 19.4 million hours spent on YouTube and 3.4 million hours on Netflix.²⁹

42. By the end of 2025, Defendant boasted that “today we are the largest dedicated gaming platform for users aged 13 and under (U13).”³⁰

D. Account Creation on Roblox

43. To play Roblox, one must first create an account. Regardless of whether the individual accesses Roblox via the website, app, or a gaming console, they see the following prompt to “SIGN UP AND START HAVING FUN!”

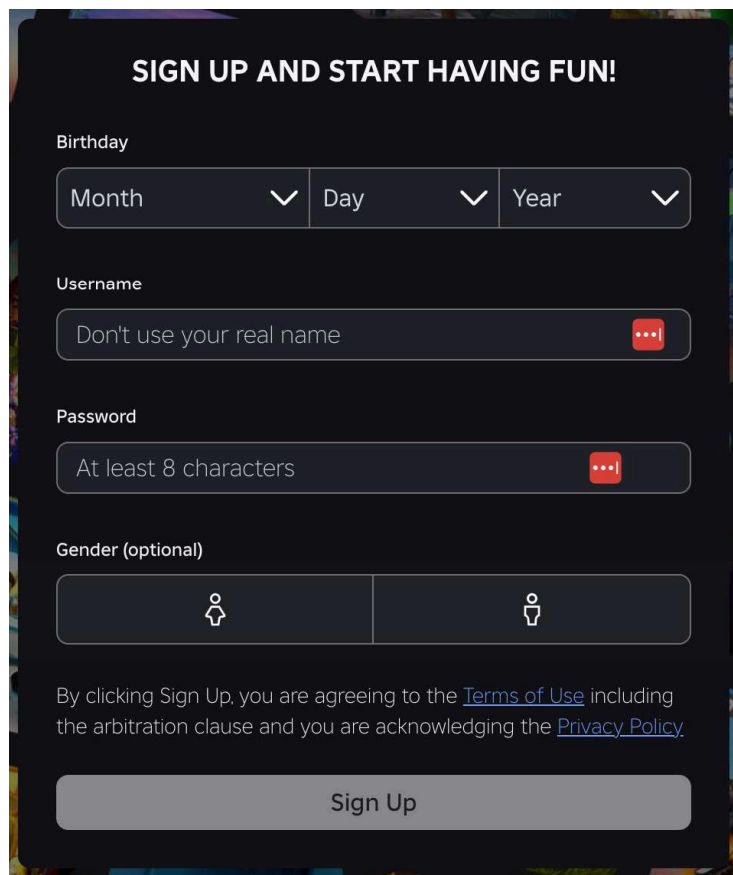


Fig. 6 – Create an Account Prompt³¹

44. Account creation requires nothing more than a birthdate, username, and password, allowing children of any age to register without restriction. Roblox has implemented no safeguards

²⁸ *Roblox Emerges as a Top Online Entertainment Platform for Kids and Teens in 2017*, Roblox, (Mar. 21, 2018), <https://ir.roblox.com/news/news-details/2018/Roblox-Emerges-as-a-Top-Online-Entertainment-Platform-for-Kids-and-Teens-in-2017/default.aspx> (last accessed May 12, 2026).

²⁹ *Id.*

³⁰ *Shareholder Letter Q4 2025*, *supra* note 23, at 3 (emphasis added).

³¹ *ROBLOX – SIGN UP AND START HAVING FUN!*, Roblox, <https://www.roblox.com/> (last accessed May 12, 2026).

to prevent minors from creating accounts and accessing the platform without their parents' knowledge or consent. In fact, Roblox takes no steps whatsoever to verify or document that a minor has obtained parental permission prior to account creation, regardless of the age of the child.

45. Further, from its inception in 2006 until the end of 2025, Defendant did not require any users to verify their ages upon sign-up. As such, child predators could—and did—establish accounts to pose as children.³²

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



Fig. 7 – Example Default Male and Female Avatars on Roblox³³

47. Users are also immediately able to play any of the millions of games on Roblox, which are much like video games. Figures 8 through 12, *infra*, were captured using a test Roblox account created for a fictitious user under the age of 13.

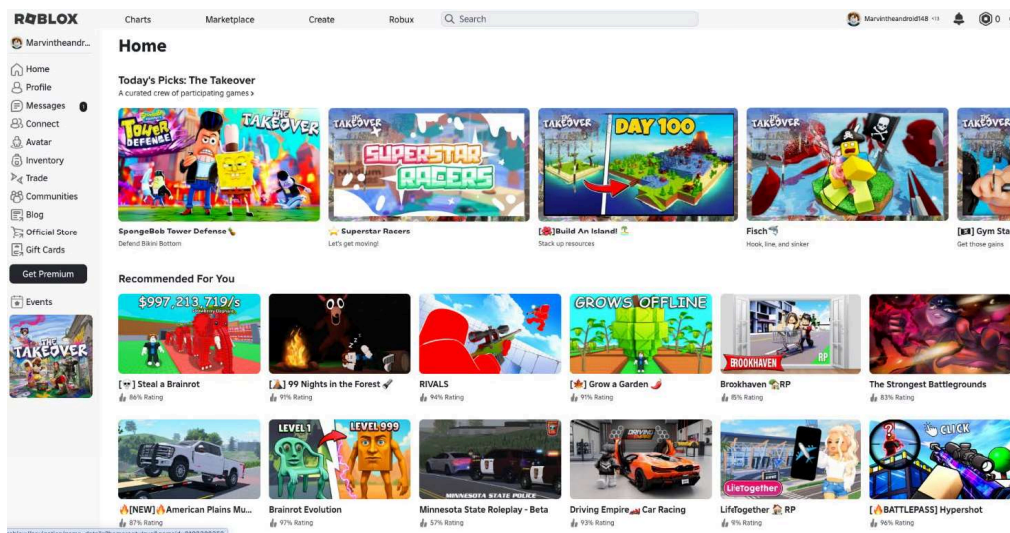


Fig. 8 – The Opening Screen Upon Creating an Account³⁴

³² As discussed in further detail below, Roblox has since announced an “age estimation” feature that attempts to ensure that users do not falsify their age in the account creation process. However, this feature remains critically flawed.

³³ Roblox Wiki, *Avatar*, Fandom, <https://roblox.fandom.com/wiki/Avatar> (last updated Feb. 27, 2026) (last accessed May 12, 2026).

³⁴ *Home*, Roblox, <https://www.roblox.com/home> (last accessed May 12, 2026).

48. Roblox games are sorted into different genres/categories, such as Sports, Role-Playing Games, Fighting, First Person Shooters, Fashion, Horror, Comedy, Military, and Naval. The games recommended to a given user will vary based on the age they entered during the account creation process and Defendant’s game recommendation algorithm.

49. Apart from games, users interact with each other in “Communities,” which are user-created groups organized around certain themes or shared interests.

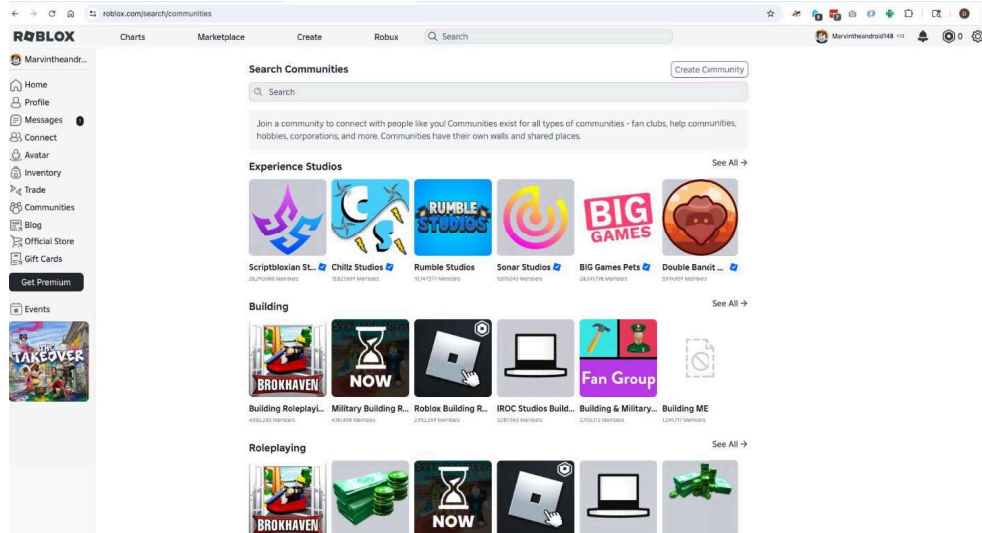


Fig. 9 – Roblox Communities³⁵

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

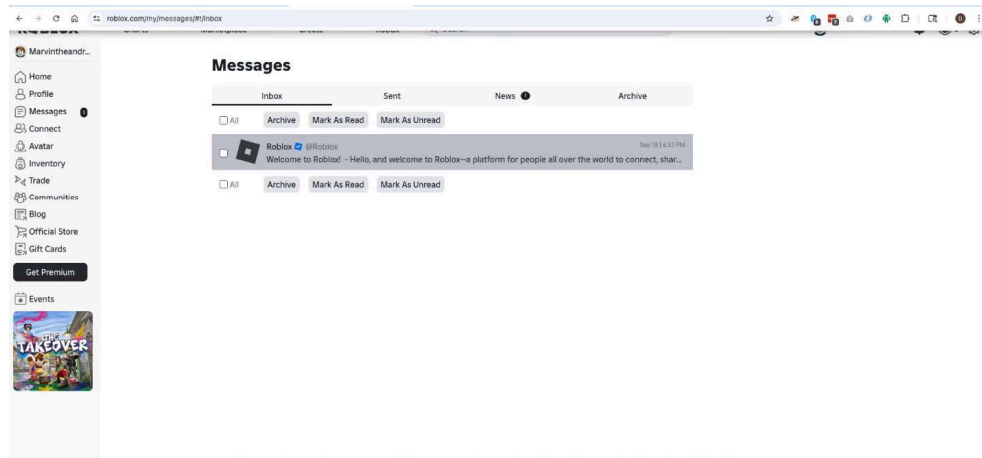


Fig. 10 – Roblox User’s Messaging Inbox³⁶

51. Parental controls are not enabled on user accounts by default. Indeed, parental controls *cannot* be enabled unless a parent first creates their own account and then completes the process of linking their own account to that of their child.

³⁵ Search Communities, Roblox, <https://www.roblox.com/search/communities> (last accessed May 12, 2026).

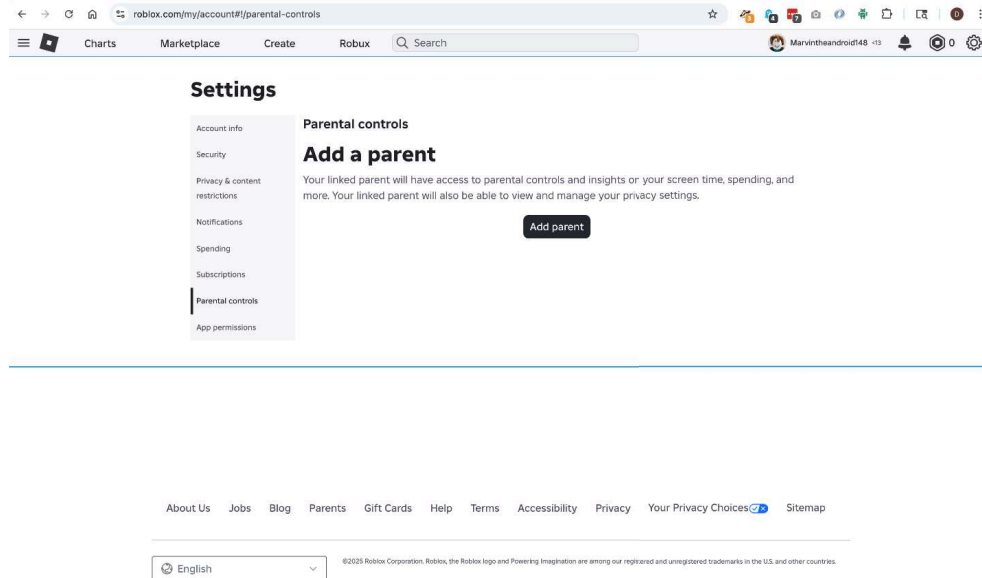
³⁶ Messages, Roblox, <https://www.roblox.com/my/messages/#!/inbox> (last accessed May 12, 2026).

52. In order even to find parental controls, a user must go to the settings button, which is represented as a gear (and not labeled by any words):



Fig. 11 – Settings Button

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



*Fig. 12 – Parental Controls Option in Settings*³⁷

54. The absence of default-enabled parental controls is not the only lack of security features on the Roblox platform.

55. Currently, unknown adult users are restricted from immediately contacting accounts identified as belonging to children under the age of 13, but such restriction is only implemented under certain conditions. Further, this change did not take effect until November 2024. For nearly two decades prior to that date, no such restriction existed. During that time, adults faced no limitations in their communication with minors on the Roblox platform. Unknown adult users were free not only to send friend requests to and exchange private messages with children of any age, but also to extend invitations for child users to join private servers or other games hosted on the platform.

³⁷ *Settings – Parental Controls*, Roblox, <https://www.roblox.com/my/account#!/parental-controls> (last accessed May 12, 2026).

56. Roblox’s November 2024 safety features update (the “**November 2024 Safety Updates**”) placed only moderate restrictions on the ability of predators to target and communicate with children on the platform. They are summarized as follows:³⁸

- a) Restricted Direct Messaging – Users under 13 may not send direct messages to others unless they are both in the same game/experience. Further, those users will be defaulted into a setting in which they can only send public messages, visible to everyone in the game/experience.
- b) Re-Classifying Content Labels – While Roblox previously utilized age-based content labels for games and other experiences on the platform, Defendant changed that process to a system of four categories: Minimal, Mild, Moderate, and Restricted. Defendant further established a setting whereby users under the age of 9 can only access Minimal and Mild content by default, and Moderate content via parental controls.
- c) Restrictions on Socializing with Users Not on Friends List – For users under 13, Roblox now restricts “experiences primarily designed for socializing with users outside of their friends list.”
- d) Updated Parental Controls – Defendant now allows parents to set spending limits and screen time limits for their children’s accounts,³⁹ to view their child’s account activity on a device other than their child’s, and to view their child’s friends list.

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

II. Roblox Is Widely Known as a Destination for Child Predators.

58. By virtue of its minimal requirements for account creation, its massive popularity among young children, and the near-total absence of oversight governing the games and experiences hosted on the platform, Roblox rapidly emerged as the preferred destination for individuals seeking to prey on minors.

³⁸ Matt Kaufman, *Major Updates to Our Safety Systems and Parental Controls*, Roblox (Nov. 18, 2024), <https://corp.roblox.com/newsroom/2024/11/major-updates-to-our-safety-systems-and-parental-controls> (last accessed May 12, 2026).

³⁹ As discussed in greater detail below, updated parental controls require the parent to be aware of the child’s Roblox account in the first instance. Defendant does not require parental approval or even acknowledgement when a child creates an account.

59. Roblox's code allows developers to customize avatar behavior and interactions, and this has been exploited to construct scenarios on the platform in which avatars engage in simulated sexual acts.

60. This type of content is pervasive. First-hand accounts published on sites such as *Common Sense Media* further document disturbing incidents of naked avatars, sexting, simulated sexual assault, and the presence of adult predators.⁴⁰ In 2018, a seven-year-old girl's avatar was violently raped by two male avatars *on a playground* within a Roblox experience, which was witnessed by the girl's mother.⁴¹ In describing the aftermath of this traumatic experience, the girl's mother explained, "I never in my wildest dreams would've ever imagined that I would have to talk with my seven-year-old about rape."⁴²

61. Roblox also hosts a staggering number of experiences centered on simulated sexual activity. For instance, children can play in "condo games" – predatory digital environments, including houses, where users can remove their avatars' virtual clothing, revealing nudity, and engage in disturbing simulated sexual activities with other Roblox users.⁴³

62. In one instance in 2018, a 6-year-old wandered into a "sex room," with dozens of players engaging in simulated intercourse.⁴⁴



Fig. 13 – Roblox "sex room" found by a 6-year-old girl⁴⁵

⁴⁰ *Parent Reviews of Roblox*, Common Sense Media, <https://www.commonsensemedia.org/website-reviews/roblox/user-reviews/adult> [<https://perma.cc/7EGN-D6LN>] (archived Sept. 25, 2025).

⁴¹ Savannah Levins, *North Carolina Mom Outraged After Roblox Game Depicts Violent Acts, Including Rape*, WCNC News (June 30, 2018), <https://www.wcnc.com/article/news/local/north-carolina-mom-outraged-after-roblox-game-depicts-violent-acts-including-rape/275-569365001> (last accessed May 12, 2026).

⁴² *Id.*

⁴³ EJ Dickson, *Inside the Underground Strip-Club Scene on Kid-Friendly Gaming Site Roblox*, Rolling Stone (Sept. 12, 2021), <https://www.rollingstone.com/culture/culture-features/roblox-virtual-strip-clubs-condo-games-sex-1197237/> (last accessed May 12, 2026).

⁴⁴ Jason Murdock, *What is 'Roblox'? Game Leaves Mother Shocked as 6-Year-Old Finds 'Sex Room'*, NewsWeek (June 4, 2021), <https://www.newsweek.com/what-roblox-roleplay-game-leaves-mother-shocked-6-year-old-discovers-sex-room-957082> (last updated June 5, 2018) (last accessed May 12, 2026).

⁴⁵ *Id.*

63. The girl had been invited to this “experience” after accepting a friend request from a stranger.⁴⁶

64. The abuse children face from predators on Roblox is not merely virtual. There are myriad instances of predators physically harming the children they meet on Roblox. For example, in 2023 a 27-year-old Delaware man kidnapped an 11-year-old girl from New Jersey after the two met on the Roblox platform.⁴⁷ That same year, a 13-year-old boy was abducted in Utah and repeatedly sexually assaulted by a predator he first met on Roblox.⁴⁸ As noted in paragraphs 10-11, *supra*, multiple instances of sextortion of minors by predators have occurred in Oklahoma, as well.

65. These encounters can even be fatal. A September 2025 New York Times piece tells the tragic story of an autistic teen who believed, for years, that he was friends with someone on Roblox named “Nate.”⁴⁹ “Nate” eventually convinced the victim to disable various parental controls and move their chats off of Roblox, where “Nate” began sextorting the victim, threatening to disclose private conversations unless the victim provided explicit photos. “Nate’s” victim killed himself in April 2024 at the age of 15. Law enforcement would later inform the victim’s parents that “Nate” was likely a 37-year-old man who had recently been arrested in Florida for possession of child sexual abuse material (“CSAM”).⁵⁰

66. Similarly, in December 2024—notably, after the November 2024 Safety Updates were announced—a journalist in Colorado published an article detailing her 8-year-old son’s disturbing experiences on Roblox. In her article, titled *Margo: How Roblox robbed our child of his innocence*, the journalist detailed a litany of catastrophes, from her son’s addiction to the platform, to his spending hundreds of dollars on unauthorized purchases of Robux (once spending \$300 in a single day), to his ultimately being sexually harassed in a public game.⁵¹

⁴⁶ *Id.*

⁴⁷ Kemberly Richardson, *Man charged in kidnapping of 11-year-old he met through Roblox from her NJ home*, WABC Eyewitness News 7 (Oct. 21, 2023), <https://abc7ny.com/post/roblox-kidnapping-new-jersey-online-grooming/13927383/> (last accessed May 12, 2026).

⁴⁸ Ben Goggin, *A 13-year-old boy was groomed publicly on Twitter and kidnapped, despite numerous chances to stop it*, NBC News (April 25, 2023), <https://www.nbcnews.com/tech/social-media/twitter-elon-musk-boy-kidnapped-groomed-discord-roblox-mcconney-rcna77985> (last accessed May 12, 2026).

⁴⁹ Eli Tan, *He Made a Friend on Roblox. Their Relationship Turned Sinister*, New York Times (Sept. 12, 2025), <https://www.nytimes.com/2025/09/12/technology/roblox-lawsuit-child-safety.html> (last accessed May 12, 2026).

⁵⁰ *Id.*

⁵¹ Ali Margo, *Margo: How Roblox robbed our child of his innocence*, Aspen Daily News (Dec. 16, 2024), https://www.aspendailynews.com/opinion/margo-how-roblox-robbed-our-child-of-his-innocence/article_42607be2-bb93-11ef-9081-5b2f829003b0.html (last accessed May 12, 2026).

67. Defendant also hosted or is hosting more than 900 Roblox accounts displaying variations of convicted sex trafficker Jeffrey Epstein’s name,⁵² as well as “hundreds” of games/experiences that are based around Sean “Diddy” Combs,⁵³ the disgraced music mogul who underwent a widely-publicized criminal trial for a litany of sex-related felonies.⁵⁴

68. Roblox’s lackadaisical attitude towards these unspeakable harms is demonstrated by the volume of content allowed to continue existing on the platform long after its harmful nature is discovered. For *nearly a decade*, Roblox has known about games like “The Condo,” which features a “writhing crowd of naked Roblox avatars” with “profanely exaggerated anatomies” having simulated sex with each other while speech bubbles above these avatars display a mix of profanity and hate speech.⁵⁵ Even today, a quick search of TikTok or YouTube reveals thousands of screen-captured videos of simulated sex from Roblox, often advertising the “best condo games on Roblox.”

69. Sex games on Roblox have become so popular that there is a sub-genre of Roblox-generated videos uploaded to pornography websites. These videos are clearly marked with the “.rbxl” file extension—Defendant’s proprietary file format—which means that the content was created via the Roblox platform.⁵⁶



Fig. 14 – Screen Shot of Pornographic Video Made Via Roblox, Hosted on the Popular Pornography Website XVideos⁵⁷

⁵² Laura Fichten, *Roblox, one of the world’s most popular gaming platforms, bans hate speech. Users have found a way to spread it anyway*, CBS News (Aug. 23, 2025), <https://www.cbsnews.com/news/roblox-spray-paint-hate-speech/> (last accessed May 12, 2026).

⁵³ Hindenburg Research, *Roblox: Inflated Key Metrics For Wall Street And A Pedophile Hellscape For Kids* (Oct. 8, 2024), <https://hindenburgresearch.com/roblox/> (last accessed May 12, 2026).

⁵⁴ Wesley Morris, *The Diddy Trial Is Over. But My Mind is Still Racing*, NY Times (July 3, 2025), <https://www.nytimes.com/2025/07/03/podcasts/diddy-sean-combs-verdict.html> (last accessed May 12, 2026).

⁵⁵ Helm, *supra* note 8.

⁵⁶ Hindenburg Research, *supra* note 53.

⁵⁷ *Id.*

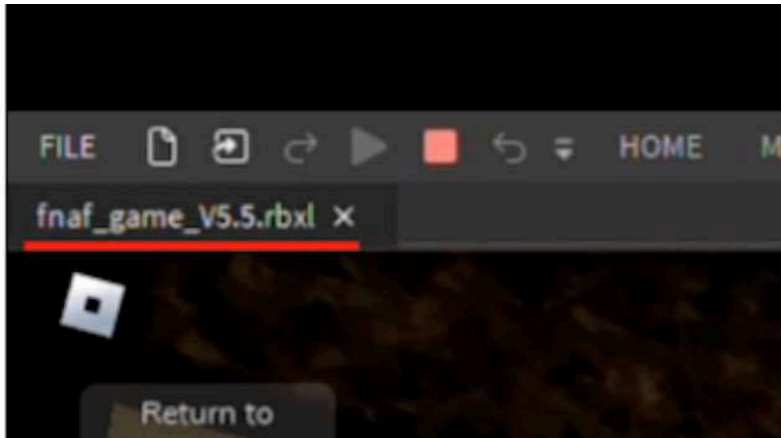


Fig. 15 – Enlargement of Upper Left Corner of Fig. 14, supra, Showing That the File Format is “.rbxl,” Which is the Proprietary Format of Defendant’s Platform⁵⁸

70. Dangerous content on Roblox is not limited to games. An investigative report found that a search for “adult” in Roblox revealed a group with 3,334 members “openly trading child pornography and soliciting sexual acts from minors.”⁵⁹ Tracking the group’s members unearthed *additional* groups engaged in the same criminal conduct, including one with 103,000 members.⁶⁰ Defendant failed to implement any meaningful restrictions on these criminal groups, much less remove them, thereby leaving all users subject to their predatory conduct.⁶¹

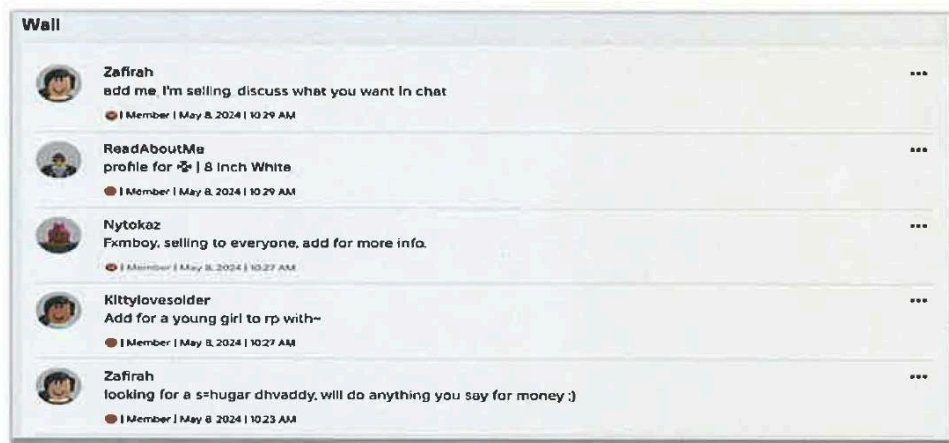


Fig. 16 – Public Chat Wall for a Group Named “Adult Studios,” Where Users Openly Solicited Child Sexual Abuse Material⁶²

71. Media reports repeatedly have highlighted that Roblox “is being used as a first point of contact for predators.”⁶³ These patterns of exploitation follow a predictable and preventable

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ *Id.*

⁶² *Id.*

⁶³ *The Dirty Dozen List '24: Roblox, A Mainstream Contributor to Sexual Exploitation*, Nat’l Ctr. on Sexual Exploitation, <https://endsexualexploitation.org/roblox/> (last updated Dec. 4, 2024) (last accessed May 12, 2026) (Under header “Proof – Evidence of Exploitation,” click sub-header “‘Robux’ Currency Offered to Children to perform Sexual Acts,” to reveal relevant content.).

sequence that Defendant has known about and facilitated for years: A predator relies on Defendants' defective design features and misrepresentations to children's safety to befriend a vulnerable young victim—often by misrepresenting their age and pretending to be a fellow child—and then manipulates the child into moving their conversation onto other apps, such as Snapchat or Discord. Once on the new app, the predator solicits explicit material from their victim, such as photos or videos of sexual acts (all of which constitute CSAM).

72. While the ultimate solicitation of explicit photos, or other such criminal acts, may occur on other apps, Roblox serves as the critical facilitator that enables these predators to identify, target, groom, and gain the trust of young victims. Defendant's inadequate safety measures and continuous failure to provide notice of the known dangers lurking on the platform are the main culprits in an ever-widening epidemic of online abuse. As one recent investigative report explains, "These predators weren't just lurking outside the world's biggest virtual playground. They were hanging from the jungle gym, using Robux to lure kids into sending photographs or developing relationships with them that moved to other online platforms and, eventually, offline."⁶⁴

73. Regardless of how the initial grooming relationship begins on Roblox, predators often attempt to make in-person contact with the child with the intention of sexually assaulting the child.⁶⁵ Through numerous well-documented and publicized cases, Defendant has long been aware of the systemic exploitation that Roblox enables and facilitates. For years, countless children have been sexually exploited and abused by predators they met on Roblox.

74. Despite widespread reporting and documentation of its predator problem, Roblox refuses to so much as *acknowledge*, let alone address, its role as the "playground" where pedophiles make initial contact and build rapport with their victims. Instead, Roblox points to its ineffective chat filters and attempts to shift blame toward other platforms where the chats become more explicit and dangerous. But the Roblox platform is designed in such a way that allows predatory adults easy access to children and makes it easy for such predators to exploit the lack of meaningful safety features and Defendant's misrepresentations and omissions to groom children and lure them from virtual contact to physical meetings, often leading to harassment, kidnapping,

⁶⁴ Olivia Carville & Cecilia D'Anastasio, *Roblox's Pedophile Problem*, Bloomberg Businessweek (July 23, 2024), <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/> (last accessed May 12, 2026).

⁶⁵ Grace Toohey, *Chilean man groomed 13-year-old girl on Roblox before flying to U.S. to meet her, police say*, L.A. Times (April 22, 2024), <https://www.aol.com/news/chilean-man-groomed-13-old-193620082.html> (last accessed May 12, 2026).

trafficking, violence, and sexual assault of minors, all instances of which these children suffer as a direct result of Defendant's actions and inactions.

75. Defendant's systematic endangerment of children has been publicly condemned by leading advocacy organizations. The National Center on Sexual Exploitation ("NCOSE") has consistently named Roblox to its "Dirty Dozen" list—an annual campaign exposing companies that facilitate, enable, or profit from sexual exploitation. The NCOSE blasts Roblox for "treat[ing] child protection like a game."⁶⁶ According to the NCOSE, "[u]ntil basic child protection standards are met, Roblox remains too high risk for kids."⁶⁷

III. Defendant Purposely Designed Roblox With Content-Agnostic Features that Nonetheless Make the Platform Unsafe for Children

76. While any third-party content described in this unquestionably is horrible, it is not the content, itself, that gives rise to the State's claims. Instead, it is the content-agnostic features that Roblox has built into its platform that the State takes issue with. As discussed in the following paragraphs, certain design elements in Roblox are defective such that they allow harm to befall children on the platform, independent of any specific third-party content that they might enable.

77. And, as also discussed below, the harms of these design features are amplified by Defendant's own first-party statements—that is, material misrepresentations—as well as Defendant's omissions of material fact.

78. In both instances (defective platform design features and Defendant's own statements and omissions) Defendant is the exclusive creator and/or author of platform-specific harms that are challenged by the State in this Petition.

A. Design Features That Lead to Child Endangerment

i. Ease of account creation and failure to verify ages

79. Defendant allows users to create accounts without providing any type of identity verification and further does not require child users to provide any type of attestation of parental knowledge or consent when establishing an account, no matter how young the user is according to the birthdate provided to Defendant in the account creation process.

80. This approach creates the minimal amount of friction for allowing a child to create an account, which has enabled Defendant to acquire as many child users as possible. However, it also enables children to create accounts without parental knowledge, consent, or oversight. It also

⁶⁶ Nat'l Ctr. on Sexual Exploitation, *supra* note 63.

⁶⁷ *Id.*

enables *predators* to create deceptive accounts—since no age or identity verification is required—and to do so as many times as they wish.

81. An example of this problem—and of Defendant’s disinterest in addressing it proactively—can be found in headlines as recent as late last year. Shortly after the assassination of Charlie Kirk at Utah Valley University, Charlie Kirk “assassination simulator[s]” began popping up on Roblox, allowing children as young as five years old to access animated bloody depictions of the September 10 shooting.⁶⁸ This is despite the fact that **more than six years ago**, in January 2020, researchers reported being able to easily locate numerous re-creations and simulators based on the 2019 Christchurch mass shooting on Roblox, which killed more than 50 people.⁶⁹ In response, a Roblox representative hollowly declared, “We do not tolerate racism, discriminatory speech, or content related to tragic events. We have a stringent safety and monitoring system that is continuously active and that we rigorously and proactively enforce.”⁷⁰

82. Defendant could easily require users to verify their age and obtain their parents’ consent. Doing so would create at least some restriction on the content available to users under 18 years old, and it also would be an obvious step toward preventing predators from misrepresenting their age (their preferred approach in grooming children). As one father told the press, “There is nothing to stop adults going on there and pretending they’re kids.”⁷¹

83. Former employees revealed that Defendant considered requiring verifiable consent but ultimately resisted its implementation out of fear that such requirements might drive users away. Specifically, employees made a presentation to management about why parental approval would enhance safety, but “it didn’t even get to the experiment phase and was disapproved.”⁷² Consequently, creating a Roblox account is alarmingly easy, requiring less than sixty seconds and facing no oversight whatsoever—a choice that prioritizes platform growth over the safety of its youngest users.⁷³

⁶⁸ Susan Ferrechio, *Children’s gaming site Roblox under scrutiny over disturbing Kirk ‘assassination simulator’*, Washington Times (Sept. 18, 2025), <https://www.washingtontimes.com/news/2025/sep/18/childrens-gaming-site-roblox-scrutiny-disturbing-kirk-assassination/> (last accessed May 12, 2026).

⁶⁹ Russell Brandom, *Roblox is struggling to moderate re-creations of mass shootings*, The Verge (Aug. 17, 2021), <https://www.theverge.com/2021/8/17/22628624/roblox-moderation-trust-and-safety-terrorist-content-christchurch> (last accessed May 12, 2026).

⁷⁰ *Id.*

⁷¹ Carl Stroud, *Horrorified Dad Found Sick Messages from Paedo Predator in His Eight-Year Old Son’s Roblox iPad Game*, The Sun (Feb. 15, 2017), https://www.thesun.co.uk/news/2872376/horrified-dad-found-sick-messages-from-paedo-predator-in-his-eight-year-old-sons-roblox-ipad-game/?utm_source=Pinterest&utm_medium=organic (last accessed May 12, 2026).

⁷² Hindenburg Research, *supra* note 53.

⁷³ Scott Tong & James Perkins Mastromarino, *Roblox Attempts to Bar Child Predators as Short Sellers Target the Popular Game Platform*, WBUR (Oct. 21, 2024), <https://www.wbur.org/hereandnow/2024/10/21/roblox-child-predators-safety> (last accessed May 12, 2026).

ii. Defective parental controls that cannot be deployed unless the parent is associated with the child's account

84. While Roblox has parental controls, as shown above, they are not able to be utilized unless a parent has their own Roblox account, which is then manually linked with their child's account.⁷⁴ Moreover, even if parents *were* to learn about their children's Roblox accounts, and *were* to attempt to utilize the controls in place, it would be impossible to adequately monitor—let alone police—a child's activity on the Roblox platform.⁷⁵

85. Thus, the parental controls feature is pointless and ineffective, because parents are not made aware that their children are using the platform in the first place. Roblox's current practices deprive parents from preemptively enabling these features given that a child can download, sign up and play the app without notice, knowledge, or consent of his or her parent.

86. Moreover, prior to November 2024, the "parental controls" were even *more* onerous and ineffective. As Defendant concedes, it was only as of November 2024—roughly two decades after the launch of Roblox—that parents could even utilize the controls on any device other than that of their child. This meant that in order to avail themselves of exercising any agency via Defendant's "parental controls" for a period of almost 20 years, a parent would be required to (1) know about their child's Roblox account in the first instance and (2) have the foresight to access Roblox *through their child's own device* in order to have any modicum of control over what their child did—or was exposed to—on the Roblox platform.⁷⁶

iii. Ineffective Chat Filters

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

88. In 2024, a Chilean man was able to circumvent Defendant's chat filters in order to lure his 13-year-old victim to other platforms.⁷⁷ While publicly, Roblox declares such outcomes are proof of the effectiveness of their chat filters, in reality this pattern demonstrates the opposite:

⁷⁴ Paragraph 53 & Fig. 12, *supra*.

⁷⁵ See, e.g., Tan, *supra* note 49; Margo, *supra* note 51.

⁷⁶ Kaufman, *supra* note 38.

⁷⁷ Toohey, *supra* note 65.

That Roblox’s efforts to keep children on-platform routinely fail despite Defendant’s repeated public assertions and supposed effectiveness of their safety features.

89. Roblox forums are replete with concerns voiced by the very game developers Roblox relies on for a significant portion of its revenue. These developers point out that by simply inserting “<” between the letters of a chat or using certain fonts (made available by Roblox), messages can easily slip by the filters.⁷⁸ Other developers note that by using “letter emojis” (again, provided by Roblox) instead of letters, content can sail easily through Roblox’s filters.⁷⁹ These developers describe this as “a serious problem” and many seem to wonder why Roblox has failed to fix these issues.

90. For a terrifying and real-world example of what can happen when messaging filters are ineffective, the State would point to the now-shuttered platform Omegle, which was a chat website that operated from 2009 to 2023. Omegle allowed users, including children, to engage in anonymous chats with strangers. Despite efforts to monitor for mature and sexual content, the website became infamous for exposing minors to explicit material, predators, and exploitation. In November 2023, Omegle announced that it would cease operations. In shutting down, its founder highlighted the site’s misuse: “There can be no honest accounting of Omegle without acknowledging that some people misused it, including to commit unspeakably heinous crimes.”⁸⁰ And he thanked one survivor for “opening my eyes to the human cost of Omegle.”⁸¹

91. Roblox’s approach to chat contrasts sharply with other gaming services like Nintendo, which use preprogrammed dialogue options to tightly control user interactions.⁸² By adopting a similar approach, Defendant could have significantly reduced—if not eliminated—the grooming and child abuse facilitated by Roblox because predators would not have been able to solicit any personal information or send any coercive or sexually suggestive messages.

92. Defendant further endanger children with a voice call feature, called Roblox Connect, which was introduced in November 2023. This virtual call feature allows users to have a conversation through their avatars in real time. Concerns were immediately raised about Roblox

⁷⁸ *Uh, Roblox? There’s a way to 100% PERFECTLY bypass the chat filter. Something needs to be done*, DevForum, <https://devforum.roblox.com/t/uh-roblox-theres-a-way-to-100-perfectly-bypass-the-chat-filter-something-needs-to-be-done/3370284/5> (last updated Mar. 15, 2025) (last accessed May 12, 2026).

⁷⁹ *Chatfilter bypass method*, DevForum, <https://devforum.roblox.com/t/chatfilter-bypass-method/3094582> (last updated Aug. 19, 2024) (last accessed May 12, 2026).

⁸⁰ Elizabeth Napolitano, *Omegle Shuts Down Online Chat Service Amid Legal Challenges*, CBS News (Nov. 9, 2023), <https://www.cbsnews.com/news/omegle-shut-down-chat-service-legal-challenges-lawsuits/?ftag=YHF5b931b> (last accessed May 12, 2026).

⁸¹ Joe Tidy, *Omegle: ‘How I Got the Dangerous Chat Site Closed Down’*, BBC (Nov. 22, 2023), <https://www.bbc.com/news/technology-67485561> (last accessed May 12, 2026).

⁸² Carville & D’Anastasio, *supra* note 64.

Connect, with one user emphasizing, “This is a bad idea Roblox, and especially on your platform because this is where most predators are coming from, and it makes it way easier for predators to prey on children.”⁸³

iv. Failure to prohibit bad actors from establishing multiple accounts

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

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

95. In April 2025, a popular YouTube personality known as Schlep (described in more detail below) publicly identified a Roblox experience called Dollhouse Roleplay, describing it on the surface to be “an innocent game with voice chat and a little dollhouse.”⁸⁴ However, Schlep claimed that “a sextortion group” called 764 “has hijacked it and actively uses the space to groom minors.”⁸⁵ According to Schlep, 764 users reference “CP, [online shorthand for child pornography, and] CNC (which stands for ‘consensual non-consent,’ essentially rape play) and other disturbing themes.”⁸⁶

⁸³ Josh Taylor, *Roblox Under Fire After Adding Controversial Voice Call Feature*, Dexerto (Nov. 15, 2023), <https://www.dexerto.com/roblox/roblox-under-fire-after-adding-controversial-voice-call-feature-2384564/> (last accessed May 12, 2026).

⁸⁴ @RealSchlep, X.com (Apr. 22, 2025, 12:15 PM), <https://x.com/RealSchlep/status/1914714640824623262> (last accessed May 12, 2026).

⁸⁵ *Id.*

⁸⁶ *Id.*

96. A year earlier, in March 2024, tech publication Wired published an article about 764, describing them an international sextortion ring that is ideologically associated with Satanism and which promotes the spread of CSAM.⁸⁷



A screencap from a video of 764 members transitioning from Telegram into Roblox. One wears a skin bearing the slogan "I love CP," a direct reference to CSAM. Roblox says it bans accounts related to 764. ROBLOX VIA ALI WINSTON

Fig. 17 – Image from the Wired Article Titled “There Are Dark Corners of the Internet. Then There’s 764,” Showing Screenshot of 764-Themed Roblox Avatars, Including One That Bears the Slogan “I Love CP.”⁸⁸

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

⁸⁷ Ali Winston, *There Are Dark Corners of the Internet. Then There’s 764*, Wired (Mar. 13, 2024), <https://www.wired.com/story/764-com-child-predator-network/> (last accessed May 12, 2026).

⁸⁸ *Id.*

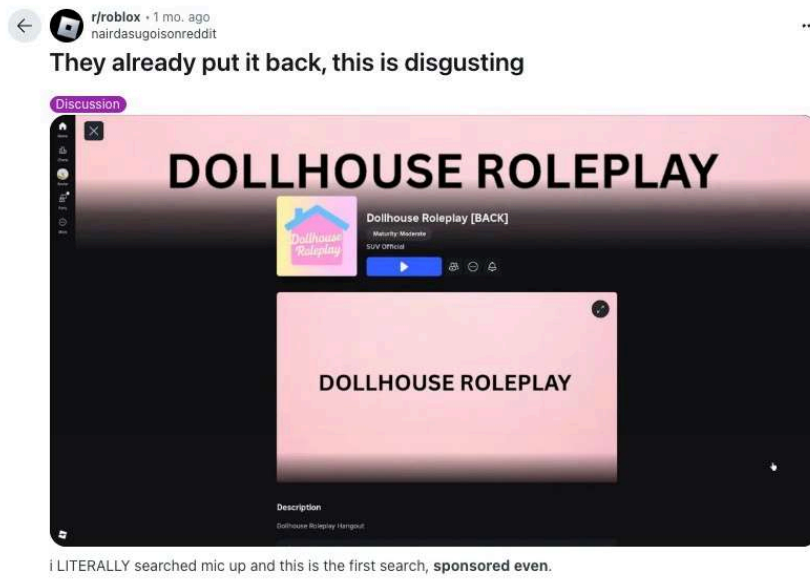


Fig. 18 – Screenshot of Dollhouse Roleplay Experience⁸⁹

98. In point of fact, not only does Roblox have a problem keeping known predators off of the platform, it goes so far as to punish individuals who *identify* these predators to the public. In the several months preceding this action, Defendant caused a massive controversy by sending a cease-and-desist letter to Schlep, the same YouTube personality that had identified the Dollhouse Roleplay game as a haven for 764 in April 2025. Schlep, who has publicly worked to expose and confront potential sex offenders on Roblox through his YouTube channel, was unceremoniously banned from the Roblox platform.⁹⁰ As explained in a Rolling Stone article detailing the scandal:

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

...

Schlep tells Rolling Stone that it has always been his intention to work with Roblox to make the platform safer, but that the company has been a “brick wall” when he seeks to open up areas of cooperation. “I’ve made it clear since the beginning,” he says. “After one of my first catches, I was like, ‘Hey, I want to work with you. I was a victim of the platform. This is why I do it. And I would

⁸⁹ @nairdasugo, *r/roblox*, Reddit (Aug. 2025), https://www.reddit.com/r/roblox/comments/1ms21ku/they_already_put_it_back_this_is_disgusting/ (last accessed May 12, 2026).

⁹⁰ Miles Klee, *Roblox Banned a Creator for ‘Hunting’ Pedophiles – And Critics are Pissed*, Rolling Stone (Aug. 25, 2025), <https://www.rollingstone.com/culture/culture-features/roblox-schlep-pedophile-vigilante-lawsuits-1235414218/> (last accessed May 12, 2026).

love some form of communication where I can just directly report these people to you, because their reports just don't work.' I have lost total faith in their moderation and report system. A lot of victims don't have every chat log. They don't have every voice call recorded. We have everything. We record the chat logs on mobile and scroll through them for the cops, and we give that to Roblox, too. It's enough for the cops where they're willing to charge and prosecute these people, but it's not enough for Roblox to take action on their platform.”⁹¹

99. In August 2025, Schlep received a cease-and-desist notice from Defendant, informing him that his account would be closed for violations to ensnare predators. In the wake of Defendant's response, a viral #FreeSchlep campaign has taken over social media—as well as Roblox, itself—and prominent figures ranging from United States congressional representatives to Chris Hansen (the host of *To Catch a Predator*) have sought to meet with Schlep and to conduct their own investigations into Defendant's inadequate—and, indeed, obfuscatory—approach to child safety.⁹²

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

100. Defendant's virtual currency system exposes vulnerable children to sexual exploitation and abuse by predators who trade or extort Robux in exchange for explicit photos from children.

101. One recent incident (reported in August 2025) involved a 10-year-old girl who was manipulated into sending sexually explicit images in return for Defendant's virtual currency.⁹³

102. The software company Bark, which specializes in child safety, provides a warning about this tactic on its website, cautioning that parents should guard against, *inter alia*, their children “[r]eceiving gifts, codes, or Robux from ‘friends.’ Offers of digital items may seem innocent, but predators often use them as a form of control or grooming.”⁹⁴

103. Defendant knowingly and/or recklessly permit predators to offer children Robux in exchange for explicit photos, or demand Robux to avoid publicly releasing previously provided explicit photos. This directly ties Defendant's profits to the sexual exploitation of children and to the exchange of CSAM. Defendant's deceptive gaming service, manipulative reward systems, and

⁹¹ *Id.*

⁹² *Id.*

⁹³ Jordan Kudisch, *Online predator used Robux to lure 10-year-old, lawsuit says*, NY1 (Aug. 22, 2025), <https://ny1.com/nyc/trending-topics/news/2025/08/22/robux-lawsuit-north-carolina> (last accessed May 12, 2026).

⁹⁴ The Bark Team, *The Dark Side of Gaming: How Predators Target Kids on Platforms like Roblox*, Bark.us (May 14, 2025), https://www.bark.us/blog/roblox-safety/?srsltid=AfmBOoo3uwY6R_pPgyn-fuEdJ4YEtQJi2ZcI2ToUBj3qthalxWWBPXF (last accessed May 12, 2026).

social dynamics, are intentionally designed to exploit children’s developmental vulnerabilities, creating psychological pressures that predators weaponize for extortion.

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

vi. Lack of Warning Labels

105. Another easy-to-implement feature that would improve safety on the platform is the addition of pop-up safety notices within chats and games to warn users about their behavior or the dangerous behavior of others. But Defendant’s executives also rejected this change.⁹⁵

106. This failure also manifests in Defendant’s inadequate age-based content labels for games and other experiences. Simply because an experience is labeled for an intended audience means nothing without proactive confirmation as to the accuracy of that label. For example, the Dollhouse Roleplay experience described above appeared to be innocent on its face, and the harmful conduct—that is, exposure to 764—occurred due to in-game player interactions within the otherwise innocuous-looking experience.⁹⁶ This demonstrates that mere labeling of the game (currently “Minimal,” “Mild,” “Moderate,” or “Restricted” on Defendant’s platform) is ineffective, but an in-the-moment warning might deter dangerous interactions (at minimum, it would be *some* affirmative action that Defendant would be taking to stop the harm occurring).

vii. Weak Moderation

107. Defendant intentionally and/or knowingly has ineffective safeguards in place, allowing games/experiences that have been removed to be reuploaded almost immediately from a new account, perpetuating the cycle of explicit and harmful content. External groups have capitalized on Defendant’s weak moderation by guiding predators to these reuploaded games, with Fast Company easily identifying 150 Discord groups dedicated to exploiting Defendant’s lack of enforcement.⁹⁷

108. Defendant employs an inadequate number of human moderators to analyze and manage content on the Roblox platform. With only about 3,000 moderators, Defendant’s

⁹⁵ Carville & D’Anastasio, *supra* note 64.

⁹⁶ @RealSchlep, *supra* note 84; Winston, *supra* note 87.

⁹⁷ Helm, *supra* note 8.

commitment pales in comparison to platforms like TikTok, which, despite having only three times the number of users, employs more than ten times the number of moderators, at 40,000.⁹⁸ Defendant attempts to justify this disparity by claiming “[y]ou really can’t judge the quality of these moderation systems by the number of people.”⁹⁹ But the reality tells a different story. Defendant’s moderators, many of them overseas contractors, report being overwhelmed by an unmanageable volume of child safety reports, making it impossible to address all concerns effectively and leaving countless safety issues unresolved.¹⁰⁰

109. Even the safety data that Defendant touts is flawed and only underscores the growing dangers created by Roblox. For example, Defendant proudly points to a low percentage of reports to the National Center for Missing and Exploited Children (“NCMEC”)—the leading U.S. nonprofit organization tasked with preventing child exploitation and assisting in the recovery of missing children. Defendant claims that it accounts for less than .04% of reports made to NCMEC. *But this data is entirely self-reported* and therefore is nothing more than evidence of Defendant’s indifference to its legal obligations to monitor and report child endangerment on the Roblox platform.

110. And Defendant’s self-reported data to NCMEC, flawed and limited as it is, still reveals a disturbing trend: Defendant’s reports about suspected child sexual exploitation have surged nearly twenty-fold over recent years, from 675 reports in 2019 to 13,316 reports in 2023.¹⁰¹

111. Defendant’s also boast that just “0.0063% of [its] total content was flagged as violating” policies.¹⁰² But like with the NCMEC data, Defendant controls the systems responsible for identifying and flagging violative content.¹⁰³ These lower percentages are thus a reflection not of safety, but of Defendant’s efforts to minimize the appearance of problems through their own inadequate reporting and enforcement mechanisms. By hiding behind self-serving metrics and

⁹⁸ Carville & D’Anastasio, *supra* note 64.

⁹⁹ Scott Tong & James Perkins Mastromarino, *Roblox chief safety officer on new safety features, past cases of child abuse on the platform*, WBUR (Nov. 18, 2024), <https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features> (last accessed May 12, 2026).

¹⁰⁰ Carville & D’Anastasio, *supra* note 64.

¹⁰¹ *2019 CyberTipline Reports by Electronic Services Providers (ESP)* at 4, Nat’l Ctr. for Missing & Exploited Children (2020), <https://www.missingkids.org/content/dam/missingkids/pdfs/2019-reports-by-esp.pdf> (last accessed May 12, 2026); *2023 CyberTipline Reports by Electronic Services Providers (ESP)* at 6, Nat’l Ctr. for Missing & Exploited Children (2024), <https://www.missingkids.org/content/dam/missingkids/pdfs/2023-reports-by-esp.pdf> (last accessed May 12, 2026).

¹⁰² Vikki Blake, *Roblox Reported Over 13,000 incidents to the National Center for Missing and Exploited Children in 2023*, GamesIndustry.biz (July 23, 2024), <https://www.gamesindustry.biz/roblox-reported-over-13000-incidents-to-the-national-center-for-missing-and-exploited-children-in-2023> (last accessed May 12, 2026) (alteration in original).

¹⁰³ *See id.*

refusing to take meaningful action, Defendant has fostered an environment where children are subjected to irreparable harm while the company continues to reap financial rewards.

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

112. As explained in paragraphs 76 through 78, *supra*, the games and other “experiences” described herein are developed by third parties, but Defendant has complete control over the Roblox platform, which hosts the games/experiences and provides the exclusive in-game currency on which the entire ecosystem operates. The games themselves could not and would not exist without the Roblox platform as a host. The tools used by these developers are ones that Defendant designs, controls, and makes available to these third parties. Defendant’s tools, which include scripting capabilities, 3D modeling systems, the Robux system, and other software, supply the infrastructure needed to create content for Roblox and for developers to make money creating that content.

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

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

115. Defendant’s control over the Roblox platform, and the way in which it allows children to engage with the games it hosts, includes but is not limited to: warnings associated with the games, age verification of users, age restrictions for each game, policies and rules regarding

inappropriate conduct exhibited within each game, monitoring for inappropriate conduct, and handling and facilitation of reports of complaints by users, among others.

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

116. For years, Defendant admitted to its shareholders and regulators that it “face[s] allegations that our Platform has been used by criminal offenders to identify and communicate with children and to possibly entice them to interact off-Platform.”¹⁰⁴ Later still, Defendant reported these same issues in SEC filings, indicating a clear lack of focus on solving these issues.¹⁰⁵

117. Defendant’s own developers admit that Roblox is unsafe for children.¹⁰⁶ Online forum posts are replete with developers posting that they would not allow their own children to use Roblox, citing pervasive issues with Defendant’s child safety policies and underscoring just how material their child’s online and physical safety is to a parent. Many of these posts highlight the platform’s explicit failures and suggest straightforward changes Defendant could implement to create a safer environment but have consistently ignored, for example:

- a) “Unfortunately, it is worse now due to Roblox’s moderation being so abysmal and Roblox being a far more widespread platform. Creeps flock aplenty when before the creep:kid ratio was much much lower ... Roblox has no interest in actually fixing the issues so long as the bad press doesn’t end up viral.”¹⁰⁷
- b) “No. Roblox is not safe for children. The amount of NSFW [Not Safe for Work] I see on this platform on a daily basis is unbelievable.”¹⁰⁸
- c) “I believe they need to automatically rate these games for older audiences, if not, you know, removing them entirely. I could keep going on about this issue, but it’s just beating a dead horse at this point.”¹⁰⁹
- d) “Roblox got banned for bad moderation; Turkey banned it to ‘protect children,’ and they are not wrong. The amount of visits from 10 of these games is, in summary, 100 million+. I don’t want to know how many of these children have

¹⁰⁴ *Q3 2021 Form 10-Q (Quarterly Report)*, *supra* note 18, at 58.

¹⁰⁵ Roblox Corporation, *Q2 2024 Form 10-Q* at 57, U.S. SEC, (Aug. 2, 2024), <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/785cb7e2-c792-470e-9ff1-021a0bbdf077.pdf> (last accessed May 12, 2026).

¹⁰⁶ Edwin Dorsey, *Problems at Roblox (RBLX) #5*, The Bear Cave (Oct. 17, 2024), <https://thebearcave.substack.com/p/problems-at-roblox-rblx-5> (last accessed May 12, 2026) (alteration in original).

¹⁰⁷ *Id.* (quoting a whistleblower document shared with the publisher containing a “thread where Roblox game developers and employees talk about the platform’s safety”).

¹⁰⁸ *Id.* (quoting whistleblower document).

¹⁰⁹ *Id.* (quoting whistleblower document).

seen nudity or even developed a p*rn addiction. But that is a big problem with Roblox doing almost nothing to prevent it.”¹¹⁰

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

119. As noted throughout this Petition, Defendant is routinely confronted with the reality of the depth and breadth of harm on the Roblox platform. It just elects to ignore that harm.

VI. Roblox Prioritizes Profits Over Safety

120. The reason that Defendant’s platform is overrun with harmful content and predators is simple: Defendant prioritizes user growth, revenue, and profits over child safety.

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

122. In pursuit of growth, Defendant deprioritized safety measures. For instance, Defendant’s executives rejected employee proposals for parental approval requirements that would protect children on the platform. Employees also reported feeling explicit pressure to avoid any changes that could reduce platform engagement, even when those changes would protect children from predators.¹¹¹

123. As one former Roblox employee explained, “You’re supposed to make sure that your users are safe . . . but then the downside is that, if you’re limiting users’ engagement, it’s hurting your metrics. It’s hurting the [daily] active users, the time spent on the platform, and in a lot of cases, the leadership doesn’t want that.”¹¹² That same employee added, “You have to make a . . . decision, right? You can keep your players safe, but then it would be less of them on the platform. Or you just let them do what they want to do. And then the numbers all look good and investors will be happy.”¹¹³

¹¹⁰ *Id.* (quoting whistleblower document).

¹¹¹ Hindenburg Research, *supra* note 53.

¹¹² *Id.* (alteration in original).

¹¹³ *Id.*

124. By limiting safety measures, Defendant not only increased its users but also reduced the company's safety expenses as a percentage of its revenue—a key metric for Wall Street, which views trust and safety costs as detrimental to Defendant's stock performance.

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

126. For example, on Defendant's 2023 fourth quarter earnings call, an analyst praised the "really high level of efficiency" seen in the numbers for infrastructure and trust and safety expenditures and then asked how those figures would evolve over time.¹¹⁴ In response, Mike Guthrie, Defendant's CFO, emphasized the company's goal of reducing expenses, stating, "cost to serve is the metric that we use and it's the metric that the [infrastructure] team owns ... *they're working hard to drive that down* ... like you said, it's about 11% now. Ultimately, with higher efficiency, more use of artificial intelligence, we see that as a high single-digit number over the next few years."¹¹⁵ He added, "we still think there's more to do there."¹¹⁶

127. At other times, Guthrie has reassured investors stating, "look for trust and safety [costs] to scale below linear as we grow"¹¹⁷ and that Defendant was "quite happy with" trust and safety costs growing "at a lower rate than our bookings growth."¹¹⁸

128. Similarly, in the second quarter of 2024, CEO Baszucki highlighted that, "[i]mportantly, our infra and trust and safety expenditures were 8% lower year-on-year."¹¹⁹

129. Defendant is fully aware that grossly inappropriate, sexually explicit, and dangerous experiences pervade Roblox, and it allows these experiences to continue to exist unchecked, despite its ability to control and/or eliminate these experiences. Leaked internal Roblox

¹¹⁴ Roblox Corp., *FQ4 2023 Earnings Call* at 14, S&P Global (Feb. 7, 2024), https://s27.q4cdn.com/984876518/files/doc_financials/2023/q4/Q4-and-Full-Year-2023-Transcript.pdf (last accessed May 12, 2026).

¹¹⁵ *Id.* (emphasis added)

¹¹⁶ *Id.*

¹¹⁷ Roblox Corp., *FQ4 2022 Earnings Call* at 11, S&P Global (Feb. 16, 2023), https://s27.q4cdn.com/984876518/files/doc_financials/2022/q4/Roblox-Q4-and-Full-Year-2022-Financial-Results.pdf (last accessed May 12, 2026).

¹¹⁸ Roblox Corp., *FQ3 2023 Earnings Call* at 5, S&P Global (Nov. 8, 2023), https://s27.q4cdn.com/984876518/files/doc_financials/2023/q3/Q3-Earnings-Transcript.pdf (last accessed May 12, 2026).

¹¹⁹ Roblox Corp., *FQ2 2024 Earnings Call* at 4, S&P Global (Aug. 1, 2024), https://s27.q4cdn.com/984876518/files/doc_financials/2024/q2/RBLX-Q2-2024-Transcript.pdf (last accessed May 12, 2026).

documents reveal that Defendant not only actively monitored this type of content, but also made decisions such as “[h]ow big of a ‘bulge’” was acceptable, and, with the introduction of layered clothing for avatars (*i.e.*, allowing avatars to wear multiple layers of clothing), whether players could be nude.¹²⁰

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

130. Defendant’s success and continued growth hinged on constant assurances to parents that Roblox is safe for children.¹²¹ Defendant has done so throughout their history and in every forum possible—on the Roblox website, through public promises of their highest executives, in news articles, on podcasts, and on and on.

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

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

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

A. Roblox’s Material and Intentional Misrepresentations and Omissions

134. Over the years, Defendant has repeatedly represented that Roblox is safe for children and has misrepresented the safety controls they have in place. As early as **2007**, the Roblox website assured parents that Roblox is an “online virtual playground ... where kids of all ages can safely interact, create, have fun, and learn.”¹²²

¹²⁰ Joseph Cox & Emanuel Maiberg, *Leaked Documents Reveal How Roblox Handles Grooming and Mass Shooting Simulators*, Vice (Aug. 1, 2022), <https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/> (last accessed May 12, 2026).

¹²¹ Kerry Breen, *Experts warn about explicit content on popular gaming platform Roblox*, Today.com (Oct. 20, 2021), <https://www.today.com/parents/roblox-experts-warn-about-inappropriate-content-t235027> (last accessed May 12, 2026).

¹²² *Frequently Asked Questions (FAQs)*, Roblox, <https://web.archive.org/web/20071105104643/http://www.roblox.com/Parents/FAQs.aspx> (archived Nov. 5, 2007) (last accessed May 12, 2026).

135. In **2009**, a blogger wrote about blocking Roblox because he doubted its safety for his children. CEO David Baszucki responded to the blogger reassuring him that Defendant flags “obviously offensive” content and remove it, and if “something is marginal, but gets flagged as inappropriate,” Roblox “investigate[s] immediately.”¹²³

136. From **2008 to 2016**, the Roblox website continued to promise parents, “We take every precaution possible to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content.”¹²⁴

137. Defendant also assured parents that it has a zero-tolerance policy for “swearing and obscenities, messages and content of a sexual or violent nature, and any sort of aggressive or threatening communication,” and “immediately suspended or permanently expelled” any offenders, which was not accurate.¹²⁵

138. In a **2013** *Wired* interview, when asked whether a parent should be concerned about whom his child was chatting with in-game, Baszucki declared, “We take every precaution possible to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content,” taking a sentence verbatim from Roblox’s webpage for parents.¹²⁶

139. In **2017**, Roblox began declaring that it “take[s] kids’ safety and privacy very seriously” and “strive[s] to continually develop new and innovative technologies that will protect the safety of our community while allowing players to imagine, create, and play together in a family-friendly environment.”¹²⁷

140. Defendant has similarly advertised Roblox as “a safe, moderated place to meet, play, chat, and collaborate on creative projects.”¹²⁸

141. In **2018**, Tami Bhaumik, Defendant’s current Vice President of Civility & Partnerships, told the *Washington Post* that Roblox “focus[es] on making sure that everything is

¹²³ Eric Frenchman, *Revisiting Roblox*, Pardon My French (Oct. 5, 2009), <https://web.archive.org/web/20250911134411/https://pardonmyfrench.typepad.com/pardonmyfrench/2009/10/revisiting-roblox.html> (archived Sept. 11, 2025) (last accessed May 12, 2026).

¹²⁴ *Keeping Kids Safe*, Roblox, <https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx> (archived May 1, 2008) (last accessed May 12, 2026); see also *Information for Parents*, Roblox, <https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents> (archived Jan. 31, 2016) (last accessed May 12, 2026) (under “Keeping Kids Safe” tab).

¹²⁵ *Keeping Kids Safe*, *supra* note 124; *Information for Parents*, *supra* note 124 (under “Keeping Kids Safe” tab).

¹²⁶ Tony Sims, *Interview with David Baszucki, Founder & CEO of Roblox*, *Wired* (Feb. 7, 2013), <https://www.wired.com/2013/02/roblox/> (last accessed May 12, 2026); *Keeping Kids Safe*, *supra* note 124; *Information for Parents*, *supra* note 124 (under “Keeping Kids Safe” tab).

¹²⁷ *Parent’s Guide*, Roblox, <https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/>, (archived July 16, 2017) (last accessed May 12, 2026).

¹²⁸ *Id.*

done in a safe and appropriate way.”¹²⁹ That year, she also claimed to another newspaper that Defendant’s “safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate.”¹³⁰ 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.”¹³¹

142. In **2019**, while presenting on a “Digital Civility Panel,” Bhaumik emphasized that Roblox “make[s] sure that we keep our environment safe” ,” citing Defendant’s “tremendous reporting system” and “incredible moderation and [child safety] team that reacts very, very quickly.”¹³² On that same panel, and in contradiction to Defendant’s representation that they had always taken “every precaution possible” to protect children, Bhaumik conceded that “digital civility did not exist at Roblox a year and a half ago and we established this and made it a movement within our company.”¹³³ She added later, “It’s still very, very early days for us. This whole digital civility focus for Roblox is still there, we’re just still establishing it.”¹³⁴

143. In a **2022** video interview about safety on Roblox, Bhaumik asserted that Defendant’s “number one priority” is “to create a safe, civil, and inclusive community” and that “[s]afety and civility has always been baked into everything that we do.”¹³⁵ That year, on a podcast, she also bragged about Defendant’s purported safety protections, including “thousands of human moderators on the front lines” and “machine learning that constantly is taking a look at chat filters.”¹³⁶ With these and other measures, she exclaimed, “[a]ny sort of bad actor that comes onto the platform is dealt with swiftly” and “[w]e remove any content that’s reported to us within minutes.”¹³⁷ However, these statements do not reflect reality.

¹²⁹ Hayley Tsukayama, *Roblox, an Online Kids Game, Explains How a Hack Allowed a Character’s Virtual ‘Rape’*, Wash. Post. (July 17, 2018), <https://www.washingtonpost.com/technology/2018/07/17/roblox-an-online-kids-game-explains-how-hack-allowed-characters-virtual-rape/> (last accessed May 12, 2026).

¹³⁰ Chris Pollard, *Danger to Kids Police Warn that Children as Young as Five-Years-Old are Seeing Naked Lego-Type Characters Having Sex on Roblox App*, The Sun (Jan. 29, 2018), <https://www.thesun.co.uk/news/5445444/roblox-app-children-danger-sex-warning/> (last accessed May 12, 2026).

¹³¹ *Id.*

¹³² Thoughtworks, *Digital Civility Panel* at 00:10:44–00:10:55, YouTube (Oct. 23, 2019), <https://www.youtube.com/watch?v=XoUs1Js7WG0> (last accessed May 12, 2026).

¹³³ *Id.* at 00:45:17–00:45:29.

¹³⁴ *Id.* at 00:47:15–00:47:28.

¹³⁵ Bedford County Sheriff’s Office VA, *Roblox: How to help kids use it SAFELY Roblox’s VP of Digital Civility & Partnerships Tami Bhaumik tells us the #1 way parents can help their kids stay safe on their platform in this brief video!* at 00:00:43–00:00:49, 00:03:06–00:03:10, Facebook (Feb. 3, 2022), <https://www.facebook.com/bedford.sheriff/videos/roblox-how-to-help-kids-use-itsafelyroblox-vp-of-digital-civility-partnerships/1338989609901259/> (last accessed May 12, 2026).

¹³⁶ Into the Metaverse, *EP.21: Tami Bhaumik (Roblox) - Building a Safe & Resilient Metaverse* at 00:36:35–00:37:08, YouTube (Sept. 13, 2022), https://www.youtube.com/watch?v=LT5_bBOYS9A (last accessed May 12, 2026).

¹³⁷ *Id.*

144. Again in **2023**, Defendant’s assured parents that they “continually develop cutting-edge technologies to ensure the Roblox platform remains a safe and fun space for players all over the world.”¹³⁸ Defendant claimed that the company was “dedicated to working together with parents and digital safety experts to promote a family-friendly environment that allows all players to imagine, create, and play online.”¹³⁹ Defendant emphasized that it was “committed to ensuring that Roblox is a safe and fun place for everyone.”¹⁴⁰ According to Defendant, Roblox “goes above and beyond to foster an environment where people of any age can create, play, learn, and imagine safely. We’ve kept children’s privacy and safety top-of-mind when designing our platform, especially through the implementation of advanced text filters that block inappropriate language or other unsafe content.”¹⁴¹

145. As recently as **2024**, Ms. Bhaumik told *Parents Magazine* that “[w]e have a responsibility to make sure our players can learn, create, and play safely. . . . This continues to be our most important priority and that will never change.”¹⁴²

146. Similarly, in an April **2024** blog post on Defendant’s website, Roblox Chief Safety Officer, Matt Kaufman, touted Defendant’s “track record of putting the safety of the youngest and most vulnerable people on our platform first.”¹⁴³ Three months later, Mr. Kaufman asserted that “Roblox has spent almost two decades working to make the platform one of the safest online environments for our users, particularly the youngest users. Our guiding vision is to create the safest and most civil community in the world.”¹⁴⁴ According to Kaufman, “For users under 13, our filters block sharing of personal information and attempts to take conversations off Roblox, where safety standards and moderation are less stringent.”¹⁴⁵ A few months later, he added, “Safety is and always has been foundational to everything we do at Roblox.”¹⁴⁶

¹³⁸ *For Parents*, Roblox, <https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/> (archived Apr. 5, 2023) (last accessed May 12, 2026).

¹³⁹ *Id.*

¹⁴⁰ *Roblox FAQ*, Roblox, <https://web.archive.org/web/20230328011957/https://corporate.roblox.com/faq/> (archived Mar. 28, 2023) (last accessed May 12, 2026) (under sub-heading “What can I do to keep my child’s Roblox account more secure?”).

¹⁴¹ Roblox, *Roblox & User Data FAQ*, <https://en.help.roblox.com/hc/en-us/articles/4406238486676-Roblox-User-Data-FAQ> (last accessed May 12, 2026).

¹⁴² Maressa Brown, *Is Roblox Safe for Kids? Here’s What the Experts Have to Say*, *Parents Magazine* (Apr. 29, 2024), <https://web.archive.org/web/20240617223841/https://www.parents.com/kids/safety/internet/is-roblox-safe-for-kids/> (archived June 17, 2024) (last accessed May 12, 2026).

¹⁴³ Matt Kaufman, *Scaling Safety and Civility on Roblox*, Roblox (Apr. 4, 2024), <https://corp.roblox.com/newsroom/2024/04/scaling-safety-civility-roblox> (last accessed May 12, 2026).

¹⁴⁴ Matt Kaufman, *Driving Civility and Safety for All Users*, Roblox (July 22, 2024), <https://corp.roblox.com/newsroom/2024/07/driving-civility-and-safety-for-all-users> (last accessed May 12, 2026).

¹⁴⁵ *Id.*

¹⁴⁶ Kaufman, *supra* note 38.

147. Attempting to deflect attention from serious safety failures, Mr. Kaufman recently told NPR, “I think sometimes we’re losing sight of the tens of millions of people where Roblox is an incredibly enriching part of their life.”¹⁴⁷ And while Mr. Kaufman publicly claims that “any time anything happens to a child that puts them at risk is one too many,”¹⁴⁸ Defendant simultaneously admitted to investors that it was “unable to prevent all such [inappropriate] interactions from taking place.”¹⁴⁹ This calculated contradiction between public messaging and private admissions—telling parents that even one incident is unacceptable while simultaneously acknowledging to investors that abuse is inevitable—exposes Defendant’s strategy of prioritizing public relations through hollow and misleading public statements over a fundamental duty to protect children.

148. According to the current website, Defendant “won’t allow language that is used to harass, discriminate, incite violence, or threaten others, or used in a sexual context.”¹⁵⁰ Roblox touts a “stringent safety system and policies,” which includes its “expertly trained team with thousands of members dedicated to protecting our users and monitoring 24/7 for inappropriate content”; its “safety review of every uploaded image, audio, and video file, using a combination of review by a large team of human moderators and machine detection before these assets become available on our platform”; and its chat filters for inappropriate content, which “are even stricter” for children under 13 and “include any potentially identifiable personal information, slang, etc.”¹⁵¹

149. As recently as July of this year, CEO Baszucki reiterated many of these plainly-disprovable statements in a nationally televised interview. When asked point-blank how big of a pedophile problem Roblox has, Mr. Baszucki dodged the question, claiming that “since day one safety’s really been our top priority, and we’ve been innovating since day one on safety and civility.”¹⁵² When asked what he would say to a parent who, fearing the potential for inappropriate communications with a pedophile, chooses to keep their child off of Roblox, Mr. Baszucki dodged

¹⁴⁷ Tong & Mastromarino, *supra* note 99.

¹⁴⁸ *Id.*

¹⁴⁹ Roblox Corp., *S-1 (Securities Registration Statement)* at 24, U.S. SEC (Nov. 19, 2020), <https://www.sec.gov/Archives/edgar/data/1315098/000119312520298230/d87104ds1.htm> (last accessed May 12, 2026).

¹⁵⁰ *Safety Features: Chat, Privacy & Filtering*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering> (last accessed May 12, 2026).

¹⁵¹ *Safety & Civility at Roblox*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox> (last accessed May 12, 2026).

¹⁵² Morning Joe, *Roblox CEO lobbies Congress on child safety as platform faces scrutiny: ‘Safety is our top priority’* at 00:01:40–00:01:47, MS Now (July 25, 2025), <https://www.msnbc.com/morning-joe/watch/roblox-ceo-lobbies-congress-on-child-safety-as-platform-faces-scrutiny-safety-is-our-top-priority-243701829644> (last accessed May 12, 2026).

again, responding that “on Roblox since day one we’ve filtered all of the communication.”¹⁵³ When asked about NCMEC and Bloomberg reporting on Roblox, Mr. Baszucki reiterated falsehoods that “safety has always been our top priority” and that the “set of technology we’ve been using since day one is very extensive.”¹⁵⁴ In attempting to paint Roblox as a safer alternative to other social media sites, Mr. Baszucki claimed (incorrectly) that Roblox does not allow the sharing of personal information like phone numbers, even though such sharing is rampant and Roblox’s filters are easily defeated.¹⁵⁵

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

VIII. Roblox Refuses to Curtail the Harms On Its Platform.

151. In November 2024, nearly *two decades* after Roblox first went live, Defendant announced a series of alleged improvements, including removing the ability to message others outside of experiences for under 13-year-old users;¹⁵⁶ giving parents a separate dashboard where they can monitor a child’s Roblox account; viewing the child’s friend list; setting spending control; managing screen time; preventing games from using chalkboard writings where people could get around the censoring of communications; and implementing restrictions to stop under 13-year-old users from accessing new Roblox games that are awaiting maturity ratings.¹⁵⁷

¹⁵³ *Id.* at 00:02:39–00:02:43.

¹⁵⁴ *Id.* at 00:03:50–00:04:02.

¹⁵⁵ *Id.* at 00:04:22–00:04:29.

¹⁵⁶ *Roblox Tightens Messaging Rules for Under-13 Users Amid Abuse Concerns*, Reuters (Nov. 18, 2024), https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/?gad_source=1&gad_campaignid=22314562799&gbraid=0AAAAA-mwunE6xRTAieyEDFXDQAYHBkXWo&gclid=CjwKCAjw2vTFBhAuEiwAFaScwstNXUoKZPZoNisLMHBAA71qEXNSFtFzobHo1XaD4WIBy34MoAaT2RoCoIgQAvD_BwE (last accessed May 12, 2026).

¹⁵⁷ Robert Booth, *Roblox to Give Parents More Control Over Children’s Activity After Warnings Over Grooming*, The Guardian (Nov. 18, 2024), <https://www.theguardian.com/technology/2024/nov/18/roblox-to-hand-parents-more-control-over-their-childrens-activity> (last accessed May 12, 2026).

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

153. Further, these changes are little more than window dressing—too little, too late. Defendant *still allows* adults to contact and message children because Defendant’s only banned user-to-user messaging for users under the age of 13 *outside of experiences*. Predators can still message children on public chats while playing games; indeed, Defendant has left child predators’ blueprint for finding children on Roblox intact since predators have always found children by playing games they know that children will frequent.¹⁵⁸ Defendant also failed to address core issues like Roblox’s lack of age verification and refusal to require parental consent to create an account. Defendant did not commit to hiring more content moderators, nor did they implement any sort of identity check to prevent registered sex offenders from making accounts. And as detailed previously, these changes did nothing to address harmful conduct which was already well underway and causing harm by the time these changes were announced.¹⁵⁹

154. Further, just as Defendant rolled out these changes, it simultaneously introduced a new “Party” feature in an attempt to counteract any potential loss in user engagement.¹⁶⁰ Because Defendant knew that users often turned to other apps like Discord or Snapchat to communicate while playing games and because Defendant knew that their safety changes would reduce key user engagement metrics, it sought to capture that traffic (and revenue) and replace any loss of engagement with the Party feature. While the Party feature is currently only available for users aged 13 and older, such limitations are hollow without robust age verifications in place. And the fact that Defendant has stated that it is exploring making such a feature available to younger users demonstrates that, far from prioritizing safety, Defendant’s real focus is protecting their bottom line.¹⁶¹

155. Defendant has also engaged in a deceptive public relations campaign using ostensibly independent online safety organizations to influence the narrative around these changes. For instance, Defendant has leveraged its ties to groups like the Family Online Safety Institute

¹⁵⁸ In an interview with BBC News, a reporter confronted Baszucki with a series of experiences that her 11-year-old son was recommended. One of these included “Late Night Boys and Girls Club RP,” which had a maturity rating of “mild.” In this experience, players would still be permitted to message each other in the game. Zoe Kleinman, *Gaming Empire: The Roblox Story (BBC News)* at 00:09:34–00:10:00, BBC News (March 17, 2025), <https://www.youtube.com/watch?v=LQztK0MCUAc> (last accessed May 12, 2026).

¹⁵⁹ Tan, *supra* note 49.

¹⁶⁰ Rebecca Ruiz, *Roblox’s New Party Feature Makes Discord Obsolete*, Mashable (Dec. 2, 2024), <https://mashable.com/article/roblox-party-discord> (last accessed May 12, 2026).

¹⁶¹ *Id.*

(“FOSI”). An online parenting magazine favorably quoted Stephen Balkam, FOSI’s CEO, as endorsing Defendant’s new features as a win for child safety.¹⁶² What the article omitted, however, is that Defendant’s own Vice President of Civility and Partnerships, Tami Bhaumik, serves as FOSI’s board chair — an obvious conflict of interest.¹⁶³ This calculated relationship exposes how Defendant manipulates public perception by using seemingly independent safety organizations as mouthpieces to shape the narrative in its favor.

IX. Only Months Before the Filing of this Petition, Roblox’s CEO Gives a “Car-Crash of an Interview,” During Which He Refers to Roblox’s Predator Problem as an “Opportunity.”

156. Shortly before the filing of this Petition, Defendant announced that it was “ushering in [a] new safety standard” on the Roblox platform, in the form of “Facial Age Estimation.”¹⁶⁴ Defendant explains that Facial Age Estimation occurs through “analyzing images and video of your face and examining your facial features”¹⁶⁵ and is outsourced to a third-party vendor called Persona.¹⁶⁶

157. Per Defendant, this technology will allow Roblox to “implement age-based chat, which helps users better understand who they’re communicating with and limits chat between minors and adults.”¹⁶⁷ Concerning the restriction of chats between minors and adults, Defendant explains that “[a]fter users complete the age-check process, we will inform them of their assigned age group: Under 9, 9-12, 13-15, 16-17, 18-20, or 21+. Users will be able to chat with those in their own age group and similar age groups, as appropriate.”¹⁶⁸ Defendant states that this safety feature would begin being deployed universally in January 2026.¹⁶⁹

158. While laudable, this safety feature is far too little, and far too late.

159. Critically, age estimation technology is known to be inaccurate. As one paper analyzing the efficacy of different age verification and estimation technologies states, “these

¹⁶² Anna Halkidis, *What Roblox’s Latest Changes Mean for Your Kids’ Online Safety*, Parents Magazine (Nov. 18, 2024), <https://www.parents.com/roblox-new-parental-controls-8747405> (last accessed May 12, 2026).

¹⁶³ *FOSI Welcomes Roblox Vice President as New Board Chair*, FOSI (Oct. 12, 2022), <https://www.fosi.org/about-press/fosi-welcomes-roblox-vice-president-as-new-board-chair/> (last accessed May 12, 2026).

¹⁶⁴ Matt Kaufman & Rajiv Bhatia, *Roblox Requires Age Checks for Communication, Ushering in New Safety Standard*, Roblox (Nov. 18, 2025), <https://corp.roblox.com/newsroom/2025/11/roblox-requires-age-checks-limits-minor-and-adult-chat?ref=platformer.news> (last accessed May 12, 2026).

¹⁶⁵ *Understanding Age Checks on Roblox*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/39143693116052-Understanding-Age-Checks-on-Roblox> (last accessed May 12, 2026).

¹⁶⁶ Kaufman & Bhatia, *supra* note 164.

¹⁶⁷ *Id.*

¹⁶⁸ *Id.*

¹⁶⁹ *Id.*

systems are *at best* accurate within a threshold of 2-4 years,¹⁷⁰ and also are likely to be error-prone when estimating the age of women or individuals that fall outside of the demographic(s) on which the algorithm was trained.”¹⁷¹ In point of fact, “[t]he age of the individual being analyzed also affects the accuracy of predictions; certain age ranges appear to be more challenging for the software to estimate accurately.”¹⁷² Some sources report that the older a person is, the harder it is to provide an accurate estimation of their age,¹⁷³ while others that that “accuracy drops on 13-17-year-olds.”¹⁷⁴

160. An example posted on Roblox’s own developer forum (also known as the Creator Hub) shows an 18-year-old using age verification technology and being identified as a 13-year-old:

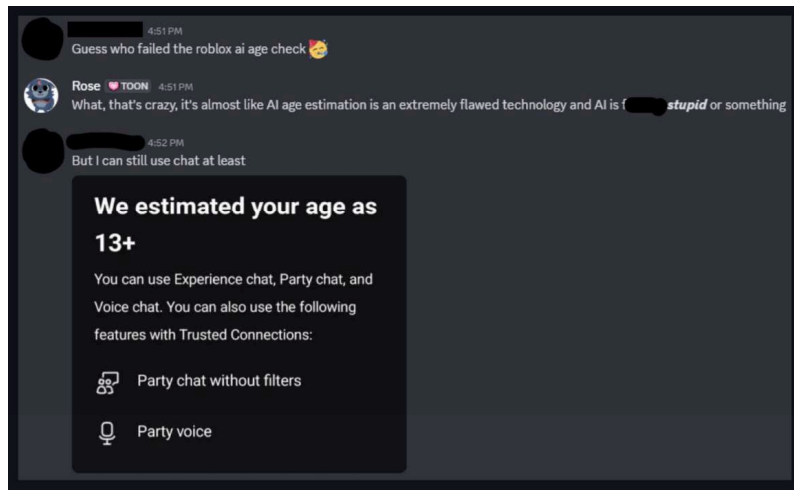


Fig. 19 – User discussion on Roblox’s Creator Hub forum regarding failure of Roblox’s age verification technology¹⁷⁵

161. The poster urges other readers to

think of how dangerous this can be. Lets [*sic*] say a child predator tries the age estimation and, due to having a younger-looking face, it estimates that they are 13 or younger. The technology has just given that child predator access to the exact age group that they want

¹⁷⁰ Position Paper: *Online age verification and children’s rights* at 21–22, European Digital Rights (Oct. 4, 2023), <https://edri.org/wp-content/uploads/2023/10/Online-age-verification-and-childrens-rights-EDRI-position-paper.pdf> (last accessed May 12, 2026).

¹⁷¹ Shane Tews, *The Challenges of Age-Prediction: Where Current Technology Falls Short*, AE Ideas (July 10, 2024), <https://www.aei.org/technology-and-innovation/the-challenges-of-age-prediction-where-current-technology-falls-short/#:~:text=No%20One%2DSize%2DFits%2D,Age%2DRelated%20Inaccuracies> (last accessed May 12, 2026).

¹⁷² *Id.*

¹⁷³ Kayee Hanaoka, et al., *Face Analysis Technology Evaluation: Age Estimation and Verification* at 21 & tbl. 13, Nat’l Institute of Standards & Tech. (May 2024), <https://nvlpubs.nist.gov/nistpubs/ir/2024/NIST.IR.8525.pdf> (last accessed May 12, 2026).

¹⁷⁴ Nathan DeStinger, *Age-Verification Evasion in 2025: How Minors Outsmart Weak Age Gates — and How to Fight Back*, Shufti (May 14, 2025), <https://shuftipro.com/blog/age-verification-evasion-in-2025-how-minors-outsmart-weak-age-gates-and-how-to-fight-back/> (last accessed May 12, 2026).

¹⁷⁵ Rose Airashii, *The ineffectiveness of the age estimation update, why it’s ineffective, and proposed solutions*, DevForum (Nov. 2025), <https://devforum.roblox.com/t/the-ineffectiveness-of-the-age-estimation-update-why-its-ineffective-and-proposed-solutions/4086132> (last accessed May 12, 2026).

to prey upon. Inversely, what if a minor who looks older than they really are uses the age estimation and it estimates they are 18+? They are now unwillingly exposed to an age group that may contain child predators or other adult users with malicious intentions.¹⁷⁶

162. But beyond the inaccuracies that are inherent in facial estimation technology—i.e., the technology’s own limits that could result in errors—facial estimation technology can be thwarted by motivated bad actors. The developer post cited above explains as follows:

child predators are going to be relentless in their attempts to fool the age estimation into giving them access to young victims. It’s extremely naive to assume that they’ll just give up if the AI correctly estimates them as an adult. There are child predators who have children of their own or work in a profession regularly interacting with children, and they may use one of these children to trick the AI age estimation technology. Even if they don’t have access to children, they could use generative AI to generate an image or video of a child that doesn’t exist and use THAT to fool the technology. They will absolutely brute force their way into the age range they want.¹⁷⁷

163. The poster is not merely speculating. Reports have proliferated of users faking their age via stolen or purchased IDs or manipulating photos or videos of themselves using AI.¹⁷⁸ Some enterprising parties even “manipulat[e] characters in video games so they appear to be a human reacting to a verification system’s requests.”¹⁷⁹

164. In fact, the videogame character workaround already has been shown to allow users to bypass the age estimation technology of the very vendor—Persona—used by Roblox: “Tom Warren, a senior editor at The Verge who is based in the UK, said he tested the technique on both Discord and Reddit (which uses a tool called Persona), and was able to trick the systems ‘within seconds’, which he said felt ‘unbelievably easy.’”¹⁸⁰

165. Accordingly, Defendant’s touting of its new safety features has been met with skepticism. On November 21, 2025, the New York Times’ “Hard Fork” podcast published an interview with Defendant’s CEO, Dave Baszucki, titled *We Asked Roblox’s C.E.O. About Child Safety. It Got Tense*.¹⁸¹ In the preamble to the interview, the Times explains that:

precisely because Roblox is so popular with children, it has also attracted the attention of adult predators....Roblox, for its part, continues to ship new safety features, including a new facial age estimation technology that the company announced this week. But the question remains: Are these safeguards enough?¹⁸²

¹⁷⁶ *Id.*

¹⁷⁷ *Id.*

¹⁷⁸ DeStinger, *supra* note 174.

¹⁷⁹ Tom Williams, ‘Unbelievably easy’: Online age checks tricked in UK, InformationAge (July 29, 2025), <https://ia.acs.org.au/article/2025/unbelievably-easy-online-age-checks-tricked-in-uk.html> (last accessed May 12, 2026).

¹⁸⁰ *Id.*

¹⁸¹ Roose, et al., *supra* note 2.

¹⁸² *Id.*

166. Mr. Baszucki did not help to answer that question in the affirmative. The first question he was asked “You have joined us today to talk about this new age-gating policy that Roblox is rolling out to protect kids. And I think we should start by just talking about the scope of the problem here. What has led you to this point? And how do you think of the problem of predators on Roblox?”¹⁸³

167. Mr. Baszucki responded “We think of it not necessarily just as a problem, but an opportunity as well.”¹⁸⁴

168. Immediately following the interview, Baszucki—and Roblox, more broadly—was excoriated in the press. One article, titled *Roblox CEO Makes Utter Fool Of Himself In Car-Crash Interview Over Child Safety*, called the comments “the most astonishingly tone-deaf response.”¹⁸⁵

169. Later, the interviewer incredulously asks Baszucki “[y]ou don’t think you have a problem with predators on the platform,” to which Baszucki replies “I think we’re doing an incredible job at innovating relative to the number of people on our platform and the hours, in really leaning into the future of how this is going to work.”¹⁸⁶

170. Once again, this response immediately was seized upon in the media. As the “*Car-Crash Interview*” reporter explained: “[t]he CEO seems to believe that the scale of *Roblox* is somehow an excuse to justify its problems, repeatedly coming back to its 150 million users and 11 billion hours a month, as if this explains it all away.”¹⁸⁷

171. Similarly, when pressed about known instances of prior tech platforms relying on A.I. moderation, only to learn that the moderation was ineffective, Baszucki once again evaded any meaningful answer. The Times interview notes:

[We] covered social networks back in the 2010s, when it was very popular for people like Mark Zuckerberg to say, “Oh, we were gonna use A.I. to solve all of our content moderation. It’s gonna take down everything that’s scammy or false and we won’t need these people anymore.” And investors loved that. And then they tried to do that and they found that actually, oh, the systems weren’t that reliable yet and maybe they were taking down too much content or maybe they were missing stuff that was bad.¹⁸⁸

172. Baszucki’s response is nonsensical:

¹⁸³ *Id.*

¹⁸⁴ *Id.*

¹⁸⁵ John Walker, *Roblox CEO Makes Utter Fool Of Himself In Car-Crash Interview Over Child Safety*, Kotaku (Nov. 21, 2025), <https://kotaku.com/roblox-new-york-times-interview-baszucki-2000646174> (last accessed May 12, 2026).

¹⁸⁶ Roose, et al., *supra* note 2.

¹⁸⁷ Walker, *supra* note 185.

¹⁸⁸ Roose, et al., *supra* note 2.

Well, look at all these social networking companies. Like, go to 2016, for example, which is a reliance on automation and whatever. We've seen a lot of things where not being on top of what's going on in your company and these algorithms leads to a lot of weird dystopianess as well. So I think we saw in 2016 those algorithms got a little, kind of into an optimization loop on weird things as well. So I think, anyways, yeah, I love your questions. I'm glad you guys are supporting how we're running Roblox on our A.I. technology.¹⁸⁹

173. The interviewer follows up: “[b]ut you’re confident that the technology has gotten good enough that you can use it to do moderation at a platform of Roblox’s scale,” to which Baszucki provides another non-answer: “[t]he scale we’re at is absolutely mind-boggling right now. Like absolutely mind-boggling. And every system: image review, text review, all of that, constantly getting better and better.”¹⁹⁰

174. Once again, instead of acknowledging—or even addressing—the problem of predators on Roblox, or whether Roblox’s newly-touted features will, in fact, lead to safer outcomes, its CEO simply returns to talking about how large-scale the platform is.

175. One of the interviewers wrote a separate piece days later, reflecting on his experience:

Given a chance to display empathy for the victims of crimes his platform enabled, or to convey regret about historical safety lapses, or even just to gesture at some sense of responsibility for the hundreds of millions of children who in various ways are depending on him, the CEO throws up his hands and asks: *how long are you guys going to be going on about all this stuff?*

...

At the same time, this is a platform launched in 2006 where, for most of its history, adults could freely approach and message any minor unless their parents had dug into the app settings. Roblox did not verify users' ages, letting any child identify as 13 or older to bypass content restrictions. Filters intended to prevent inappropriate chat or the exchange of personal information were easily bypassed by slightly changing the spelling of words. Parental controls could be circumvented simply by a child creating a new account and declaring that they were at least 13.

...

Understanding how attractive Roblox would be to predators, the company long ago could have blocked unrestricted contact between adults and minors. It could have adopted age verification before a wave of state legislation signaled that it would soon become mandatory anyway. It could have made it harder for children under 13 to create new accounts, and require them to get parental consent in a way it could verify.

But doing so would require Roblox to focus on outcomes for children, at the likely expense of growth. And so here we are.¹⁹¹

¹⁸⁹ *Id.*

¹⁹⁰ *Id.*

¹⁹¹ Casey Newton, *Roblox is a problem — but it's a symptom of something worse*, Platformer (Nov. 24, 2025), <https://www.platformer.news/roblox-ceo-interview-backlash-analysis/> (last accessed May 12, 2026) (emphasis added).

VIOLATIONS OF LAW

COUNT I

**OKLAHOMA CONSUMER PROTECTION ACT
15 O.S. § 751-763
(UNFAIRNESS)**

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

177. The OCPA prohibits businesses from knowingly engaging in “unfair” trade practices, which are defined as any practice “which offends established public policy” or is “immoral, unethical, oppressive, unscrupulous or substantially injurious to consumers.” 15 O.S. § 752(14).

178. Defendant has engaged and continues to engage in “consumer transactions,” as that term is defined in the OCPA, with hundreds of thousands of Oklahomans, if not more.

179. By designing and deploying Roblox without adequate safety features, while knowing full well the extent of the child predator problem rampant on the platform, Defendant has engaged in unfair trade practices prohibited by the OCPA.

180. Defendant’s scheme is particularly unfair because it harms child users, who are a highly susceptible class of consumers. Defendant knew at all times that children are the ones who risk being preyed upon by sophisticated—and malicious—adults on the Roblox platform. Yet Defendant consistently failed to protect the children on the platform, or alert parents or the public to the dangers of the platform.

181. By refusing to implement sufficient safeguards on the Roblox platform and by failing to warn families of the dangers of the Roblox platform, Defendant caused or is likely to cause substantial injury to Oklahoma consumers. Specifically, Defendant’s unfair conduct has jeopardized the safety and well-being of Oklahoma’s children.

182. Defendant has access to information and data about the safety of its platform that is unavailable to its consumers, and Defendant does not share that information and data. This asymmetry of information has led to profound harm being visited upon Roblox users and their families.

183. Through the conduct complained of herein, Defendant engaged in practices that are substantially injurious to Oklahoma consumers, including children.

184. Each instance of Defendant’s unfair practices constitutes a separate violation of the OCPA.

185. Insofar as there are positive benefits associated with Defendant’s conduct, those benefits do not outweigh the harm arising out of Defendant’s conduct.

COUNT II
OKLAHOMA CONSUMER PROTECTION ACT
15 O.S. § 751-763
(DECEPTION)

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

187. Under the OCPA, a business engages in deceptive conduct by, either orally or through a writing, making a “misrepresentation, omission or other practice that has deceived or could reasonably be expected to deceive or mislead a person to the detriment of that person.” 15 O.S. § 752(13).

188. Defendant has engaged and continues to engage in “consumer transactions,” as that term is defined in the OCPA, with hundreds of thousands of Oklahomans, if not more.

189. As described in this Petition, Defendant has repeatedly deceived consumers through its words, conduct, silence, and action—all in violation of the OCPA.

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

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

192. Defendant willfully and affirmatively made these misrepresentations and omissions to the people of Oklahoma. And, in so doing, Defendant concealed vital knowledge and information from parents, children, and consumers within Oklahoma, resulting in the significant risk of harm.

193. Each instance of Defendant’s deceptive practices described herein constitutes a separate violation of the OCPA.

PRAYER FOR RELIEF

Plaintiff respectfully requests that this Court:

- A. Enter judgment against Defendant in favor of the State of Oklahoma for each violation alleged in this Petition;

- B. Issue a permanent injunction (i) requiring Defendant to implement meaningful and lasting safeguards to protect children on the Roblox platform; and (ii) requiring Defendant to meaningfully and publicly disclose, on a regular basis, the risks posed to children on the Roblox platform;
- C. Issue a permanent injunction prohibiting Defendant from engaging in deceptive acts and practices in violation of the OCPA;
- D. Order Defendant to pay civil penalties to the State of Oklahoma not more than \$10,000 per violation of the OCPA as provided by 15 O.S. § 761.1;
- E. Enter judgment finding the total number of Defendant's distinct violations of the OCPA;
- F. Enter judgment against Defendant and in favor of the State of Oklahoma for the reasonable costs and expenses of the investigation and prosecution of Defendant's unlawful conduct, including attorney's fees, expert and other witness fees, and costs, as provided by 15 O.S.C. § 761.1; and
- G. Award such other relief as the Court deems necessary and proper under the circumstances.

DATED this 14th day of May, 2026.

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