CAUSE NO. _____

STATE OF TEXAS, *Plaintiff*,	§ §	IN THE DISTRICT COURT
	§	KING COUNTY, TEXAS
v.	§ §	___ JUDICIAL DISTRICT
ROBLOX CORPORATION, *Defendant.*	§ §	**JURY TRIAL DEMANDED**

PLAINTIFF'S ORIGINAL PETITION

Plaintiff, STATE OF TEXAS, acting by and through the Attorney General of Texas, Ken Paxton, brings this action to stop the Defendant, ROBLOX CORPORATION ("Defendant" or "Roblox"), from endangering children, deceiving parents, and profiting from a digital playground that conceals predators and a manipulative psychological design behind a façade of "family fun."

For years, Roblox has marketed itself as the world's safest and most family-friendly online gaming platform for kids.[1] It tells parents that it "cares deeply about child safety," and takes "every precaution possible" to protect them.[2] It tells investors that it operates a responsible and transparent platform.[3] And it tells the public that its mission is to "bring the world together through play."[4]

In reality, Roblox is a sprawling and unregulated digital playground that is overrun by predators and saturated with sexual content. The company recruits minors into creating, spending, and socializing in a virtual environment designed to look benign and whimsical to unsuspecting

[1] Roblox Corp., *Q1–Q2 2025 California AB 587 Transparency Report* (2025), https://bit.ly/4oPeYYr.
[2] Roblox Corp., *Families and Caregivers: Helping Families Thrive on Roblox*, https://bit.ly/4orOTPq. Roblox (last visited Nov. 3, 2025).
[3] Roblox Corp., Exhibit 99.2: "Shareholder Letter — Q1 2021," SEC EDGAR, (May 10, 2021), https://www.sec.gov/Archives/edgar/data/1315098/000119312521156255/d140612dex992.htm
[4] Jandel, "From the Devs": Why Roblox is Going to Change the World, Medium (July 16, 2019), https://medium.com/roblox-developer/from-the-devs-why-roblox-is-going-to-change-the-world-by-jandel-ba8a468bab30.

parents. Meanwhile, Roblox fails to protect those children from the very real monsters that it knows are lurking on its platform.

Roblox knows who its users are. Its own filings and internal reports confirm that the majority of its tens of millions of daily users are under the age of thirteen, while millions more are adults. Yet, for years, Roblox has utterly failed to implement adequate protections against sexual predators, unsafe chat environments, or inappropriate virtual experiences. Even worse, it monetizes and *promotes* the very interactions that put children at risk: it has encouraged more adults to join its platform while taking a cut of every transaction, every experience, and every avatar upgrade that keeps a child online just a little bit longer. Its own in-game currency, "Robux," obscures real-world costs, encourages compulsive purchase, and provides leverage for predators to hunt and abuse children. Rather than being lured by candy, modern-day predators have lured children with Robux.

Texas does not tolerate deception. It does not tolerate the endangerment, abuse, and exploitation of its children. Therefore, the State of Texas brings this action to hold Roblox accountable, to obtain civil penalties, and to ensure that no Texas child is left unprotected inside a multibillion-dollar digital hellscape that preys on innocence under the banner of play.

INTRODUCTION

This is an action brought by the State of Texas, through its Attorney General Ken Paxton, to hold Defendant Roblox Corporation accountable for engaging in deceptive trade practices, namely, promising parents that its interactive gaming platform was safe for children while Roblox knowingly facilitated the sexual exploitation of teen and preteen children and the distribution of child sexual abuse material ("CSAM") on its platform. This action also seeks to hold Roblox

accountable for failing to warn Texas parents of the ongoing sexual exploitation of children occurring on their platform and for reckless disregard for safety that has proximately resulted in the tragic sexual exploitation of Texas's minor children.

Roblox is one of the most popular interactive online gaming platforms in the United States. It has over 80 million daily users, many of whom reside in Texas and most of whom are under the age of 18. Indeed, Roblox was initially created for children, and Defendant markets Roblox as the "#1 gaming site for kids and teens,"[5] claiming that it provides beneficial social and educational experiences for children. As many as two-thirds of U.S. children ages 9 to 12 have Roblox accounts.[6]

Roblox repeatedly assures the public that it is safe for children and that the company has taken "every precaution possible" to protect them.[7] But contrary to its empty assurances, Defendant has failed to implement basic safety controls to protect child users, and it has intentionally concealed the substantial dangers that Roblox presents, ultimately causing severe harm and damage. Despite being aware of child exploitation, pornography, and addiction on its platform for years, Defendant failed to take reasonable precautions, and it even welcomed more adults onto its platform for profit.

As Defendant has long been aware, Roblox is the perfect environment for child predators, pornographers, scammers, fraudsters, online sex rings, and inappropriate content. It is an interactive gaming platform in which users—of all ages, from 4 years old or even younger to adults of all ages—can easily sign up and then navigate the universe in avatars, which provide absolute

---

[5] *World's Largest User-Generated Gaming Destination Now Available on Xbox*, ROBLOX (Jan. 27, 2016), https://ir.roblox.com/news/news-details/2016/Worlds-Largest-User-Generated-Gaming-Destination-now-Available-on-Xbox/default.aspx.

[6] Tonya Mosley et al., Boundless Creativity or Labor? Critics Say Roblox Hoards Profits and Shortchanges Kids' Safety, WBUR (Jan. 18, 2022), https://www.wbur.org/hereandnow/2022/01/18/roblox-kids-safety-profits.

[7] Tony Sims, *Interview with David Baszucki, Founder & CEO of Roblox*, WIRED (Feb. 7, 2013), https://www.wired.com/2013/02/roblox/.

anonymity. Users wander around in this unregulated universe, where children can chat with not just other children but adults who are disguised by avatars and can misrepresent their age and intentions.

Users can also play interactive games called "experiences," which are mostly created by third-party developers. There are currently millions of experiences on Roblox, and thousands of them are highly inappropriate and sexual. Although Defendant represents to Texas parents that it undertakes robust content review, that is patently false and misleading, given the sheer volume of inappropriate content on the platform. Some experiences are at strip clubs, others are at "Epstein's Island," where simulated underage sexual activity takes place. There are also hundreds of experiences just about Sean "Diddy" Combs, who was recently convicted of trafficking and prostitution arising from his hosting of "freak offs," *i.e.*, group sex parties. These are just a few of the thousands of examples, some of which are discussed below. Even to the limited extent that Roblox has claimed to implement content moderation in the last few months, those checks have been wholly insufficient and easy to circumvent. Highly inappropriate material still pervades the platform to this day, and it remains accessible to children.

Further, the inappropriate sexual activity facilitated by Roblox is not merely virtual. Child predators have found numerous ways to use Roblox to obtain and share real child pornography, to groom and extort young children with online currency, and ultimately meet them in person to physically abuse them. The examples are legion and terrifying. Dozens of FBI investigations, criminal convictions, and private lawsuits detail the ways in which Roblox has facilitated real child abuse and pornography.

For example, one lawsuit brought by the parent of a Texas child alleges that the child was

raped after being groomed through Roblox and the messaging platform, Discord.[8] When the child was 10 years old, she created a Roblox account and began spending significant time on the app.[9] She was repeatedly exposed to dangerous situations on Roblox, including one situation where her avatar was surrounded by other users in an "experience" who began sharing her IP address and physical home address and demanding nude photographs of her.[10] Due to repeated instances of abuse on the platform, she sought guidance from an online "counselor" she met in one of Roblox's "experiences" that purported to have a "warm and friendly atmosphere that's both inviting and relaxing."[11] But unbeknownst to her, this supposed "counselor" was really an adult male predator who began grooming her on Roblox and Discord.[12] He repeatedly convinced the child to send CSAM of herself, and he sent her explicit images of himself.[13] The abuse later escalated when the predator traveled to the child's house, slept in her room with her, had vaginal sexual intercourse with her the next morning, and filmed the sexual acts on his cell phone.[14]

This tragic example is indicative of a pattern of grooming and predatory behavior on Roblox, of which Roblox has long been aware. Often, the grooming begins with a predator approaching a child in the universe or in an experience while playing a seemingly harmless game, and chatting with the child about the game, hidden by the anonymity of an avatar. Then the predator can initiate more personal chats, start to groom the victim, and eventually try to abuse them online or in person. Predators also lure the child with promises of online currency called "Robux." Because of the social and economic nature of Roblox, the game and its currency are highly addictive for children. Kids

---

[8] Complaint, *Doe v. Roblox Corp.*, No. 3:25-cv-00128 (S.D. Tex filed Apr. 30, 2025).
[9] *Id.* ¶ 206.
[10] *Id.* ¶ 208.
[11] *Id.* ¶ 211.
[12] *Id.*
[13] *Id.* ¶ 212.
[14] *Id.* ¶ 213.

often say they will do "anything for Robux."[15] "Sextortion" is also a problem on Roblox. After receiving inappropriate pictures or messages in exchange for highly coveted Robux, the predator threatens the child that he will tell on or get the child in trouble if he or she does not take even more inappropriate pictures, or if he or she refuses to meet in person.

But the risks are not just from "lone wolf" child predators. The FBI is currently investigating a massive, worldwide cult of "nihilistic violent extremists" called "764" that, among many other crimes, exploits children and shares pornography. The criminal enterprise has been designated as a terrorist organization and has frequently used Roblox to facilitate its heinous and unlawful activities.

Despite knowing about these serious problems for years, Defendant has failed to act. It has failed to implement reasonable guardrails and, worse, it has falsely and deceptively advertised its platform as safe for children, repeatedly making misleading statements and material misrepresentations of fact. Among other things, Roblox has represented that it engages in fulsome content review, that safety is its top priority, and that it takes "every precaution" possible. None of these statements are true.

Solely for profit, Roblox has knowingly enabled sexual exploitation and abuse of children across the United States, including in the State of Texas. Through willful disregard and intentionally deceptive practices, Defendant has created an interactive platform in which child predators thrive, directly contributing to the widespread victimization of minor children across the State of Texas.

---

[15] Cecilia D'Anastasio, *Roblox's Pedophile Problem*, BLOOMBERG (July 22, 2024), https://www.bloomberg.com/features/2024-roblox-pedophile-problem/.

Only within the last year, after its legal troubles began to mount, has Roblox started to implement policy changes. But those changes are far too little and far too late. Defendant's deliberate failure to implement effective safety measures to protect child users from well-documented predatory threats, along with its ongoing failure to warn parents and children of the foreseeable dangers posed by its platform, has caused the widespread sexual exploitation of minors and inflicted severe, lasting harm upon the children of Texas.

The Attorney General of Texas, as the chief legal officer of the State, entrusted with the duty to safeguard its citizens from abusive, unlawful, and exploitative corporate conduct, brings this action to seeking the imposition of civil penalties, recovery of attorneys' fees and costs, injunctive relief, and all other remedies, orders, and judgments authorized under Texas law.

DISCOVERY CONTROL PLAN

1. The discovery in this case is intended to be conducted under Level 3 pursuant to Texas Rule of Civil Procedure 190.4. Restrictions concerning expedited discovery under Texas Rule of Civil Procedure 169 do not apply because the State seeks monetary relief greater than $250,000 as well as non-monetary injunctive relief as part of its claims, and the State's claims are within the jurisdictional limits of the Court.

PARTIES

2. Plaintiff is the State of Texas, by and through the Consumer Protection Division of the Office of the Texas Attorney General.

3. Defendant Roblox Corporation ("Defendant") is a Delaware corporation with its principal place of business in San Mateo, California. Defendant designed, engineered, manufactured, tested, advertised, marketed, distributed, sold and/or otherwise placed into the

stream of commerce Roblox. Defendant provides Roblox to all fifty states, including the State of Texas. Defendant ratified every act or omission alleged herein.

JURISDICTION AND VENUE

4. This enforcement action is brought by Attorney General of Texas Ken Paxton, through his Consumer Protection Division, in the name of the State and in the public interest, under the authority granted to him by section 17.47 of the Deceptive Trade Practices Act ("DTPA"), on the ground that Roblox has engaged in false, deceptive, and misleading acts and practices in the course of trade and commerce, as defined in, and declared unlawful by, sections 17.46(a) and (b) of the DTPA. In enforcement suits filed under section 17.47 of the DTPA, the Attorney General is authorized to seek civil penalties, redress for consumers, and equitable relief.

5. Personal jurisdiction is proper under Texas's long-arm statute, Tex. Civ. Prac. & Rem. Code § 17.042.

6. Specifically, this Court has personal jurisdiction over Defendant because Roblox purposefully directs its activities toward Texas residents by operating and providing access to its online platform in Texas; advertising and marketing to Texas parents and children; offering and selling Robux, subscriptions, and other services to Texas consumers; collecting data and payments from Texas users; and otherwise entering into ongoing electronic transactions with Texas residents. Plaintiff's claims arise out of and relate to these contacts, including Defendant's facilitation of child exploitation and its deceptive and unfair practices that have injured Texas children and families.

7. Defendant has also engaged in continuous and systematic business contacts with Texas, including by distributing and furnishing its platform statewide; maintaining user accounts

for Texas residents; processing purchases made from Texas; and communicating with Texas users and parents regarding the platform's features, safety settings, and policies. Defendant intended its platform and products to be used in Texas.

8. Through this advertising, marketing, distribution, and sale of its online services and virtual currency to Texas residents, including minors, Defendant has purposefully availed itself of the benefits and protections of Texas law and created substantial connections with Texas. These contacts are not random, fortuitous, or attenuated.

9. Venue is proper in King County under section 17.47(b) of the DTPA and Tex. Civ. Prac. & Rem. Code § 15.002. Specifically, venue is proper because the cause of action arose, in substantial part, in this County and throughout Texas. Defendant's conduct—including offering Roblox to Texas residents, marketing to Texas families, and causing injury to Texas minors and families—constitutes transactions and events occurring in this State, including within King County. In the alternative, because Defendant is a nonresident corporation, venue is proper in any Texas county under § 15.002.

PUBLIC INTEREST

10. The State has reason to believe that Defendant has engaged in, and continues to engage in, the unlawful acts and practices described below. In addition, the State has reason to believe that Defendant has caused injury, loss, and damage to the State, and has caused adverse effects to the lawful conduct of trade and commerce, thereby directly or indirectly affecting the people of this State. Therefore, the Consumer Protection Division of the Office of the Attorney General initiates this proceeding in the public interest. Tex. Bus. & Com. Code Ann. § 17.47.

TRADE AND COMMERCE

11. Roblox has at all times, as described below, engaged in conduct that constitutes "trade" and "commerce," as defined in section 17.45(6) of the DTPA.

ACTS OF AGENTS

12. Whenever in this Petition it is alleged that Defendant did any act, it is meant that Defendant performed or participated in the act or Defendant's officers, agents, or employees performed or participated in the act on behalf of and under the authority of the Defendant.

FACTUAL ALLEGATIONS

I. DEFENDANT CREATES ROBLOX, AN INTERACTIVE PLATFORM DESIGNED FOR AND MARKETED TO CHILDREN UNDER 13

A. Roblox Is an Interactive Platform with Third-Party Developer "Experiences"

13. Launched in 2004, Roblox is an online gaming platform that allows for interactive gameplay in an open universe. Users on Roblox can traverse the platform using a Lego-like avatar, communicate and chat with other user-avatars, and play interactive games that are referred to as "experiences." Most of these experiences are designed and created by third-party developers or users, not Roblox itself, though Roblox provides the tools to develop content.

14. Third-party game developers can easily upload their content to the platform. Given the ease of putting up new content, there are currently more than 6.4 million experiences within the Roblox ecosystem.[16] At the same time, Defendant has complete control over the hosting functions, including but not limited to deciding whether to issue warnings associated with the experiences, requiring age verification and/or age restrictions for each experience, policies and rules regarding inappropriate conduct, and whether and how to monitor for inappropriate

[16] ROBLOX, https://corp.roblox.com/ (last visited Oct. 9, 2025).

conduct, and handle and facilitate complaints by users.

15. Roblox is designed to be a uniquely interactive online platform, allowing and encouraging users to communicate and interact with each other in real time, and to play games and go through experiences together. Gameplay interactions, user hubs, direct messaging, and voice chat all promote social interactions between and among users.

16. Roblox's co-founder and CEO David Baszucki has explained that his vision is for Roblox to bring about "the next phase of human interaction," which he also has described as "a new category of human interaction," and "a new category of human co-experience."[17] Defendant has similarly explained that it "operates a human co-experience platform . . . where users interact with each other to explore and develop immersive, user generated, 3D experiences."[18]

17. After creating an account, all users are assigned a default player avatar, which is a character that represents the individual user within certain games.

Example Default Avatar on Roblox

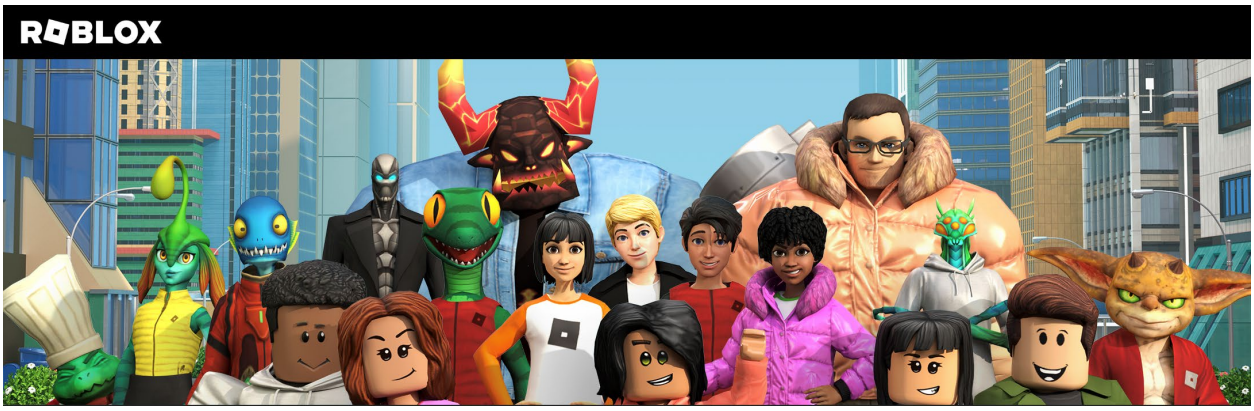
[17] David Baszucki, *The CEO of Roblox on Scaling Community-Sourced Innovation,* HAR. BUS. REV., (Mar.-Apr. 2022), https://hbr.org/2022/03/the-ceo-of-roblox-on-scaling-community-sourced-innovation.
[18] Roblox Corp., Quarterly Report (Form 10-Q) at 15 (May 13, 2021).

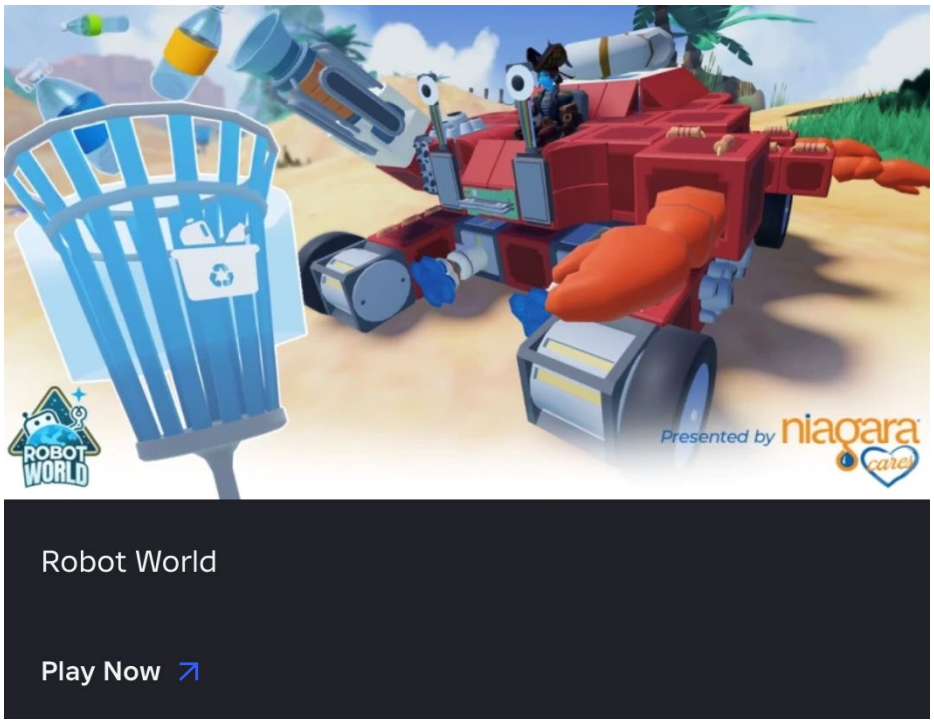
18. Users can then play in any of the millions of experiences on Roblox, which are much like video games. These games are sorted into different genres/categories, such as Sports, Role Playing Games, Fighting, First Person Shooters, Fashion, Honor, Comedy, Military, and Naval. The games recommended to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

19. Defendant generates revenue, in part, by selling users a platform-exclusive currency called "Robux," which must be purchased using real-world currency before exchanging "Robux" for digital content in the closed digital economy. Robux can be purchased in a single transaction, or a user may subscribe to receive Robux on a recurring basis with a Roblox Premium membership. Defendant also offers Robux gift cards that anyone can purchase and send to any user.

B. Roblox Specifically Markets to Children Under 13 and Makes Its Platform Easily Accessible to Pre-teen Children, While Promising Safety to Parents

20. Defendant initially designed Roblox for young children, as is evident not only by its own statements but also by the child- and "Lego"-like design and gameplay. A parent walking by while their kids were playing likely would not realize that the game has anyone other than children on it.



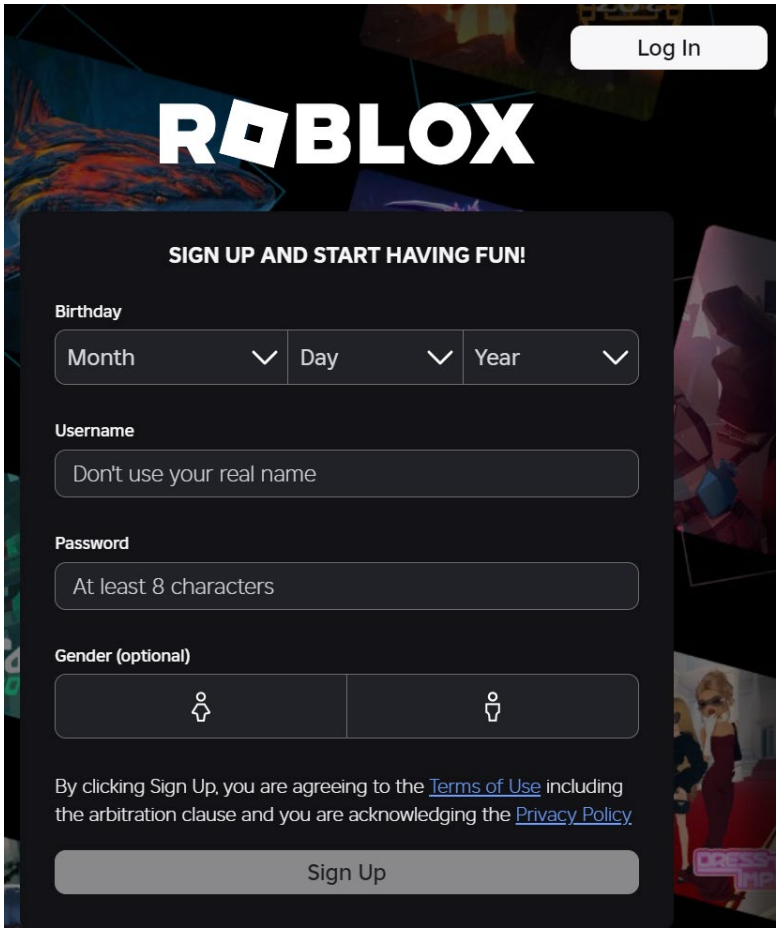


Images from Roblox's site, dated October 8, 2025

21. Unlike most online social media platforms (like Facebook, X, and Instagram), Roblox is accessible to children under the age of 13 years old. More than that, it is incredibly easy for those minors to access Roblox. It is free to download and play, and it is available on gaming consoles, computers, tablets, and cellular devices.

22. Individuals who wish to play Roblox must first create an account. It is a seamless process to "SIGN UP AND START HAVING FUN!" Users are only required to provide a birth date, username, and password. Users of any age can create an account. There is no age minimum, and no requirement that a child user provide any type of attestation of parental knowledge or consent when establishing an account. Further, Defendant does not require users to provide any type of age or identity verification to sign up. Roblox does not require users to provide a verified email address, phone number, name, or *real* birthday. As such, users can easily represent

themselves as being younger or older than their actual age and create as many accounts as they want. This enables child predators to pose as children and children to access the game as adults.



Roblox Sign-Up Screen as of November 3, 2025

23. A child of any age can do all this without any parental oversight—Defendant provides no mechanism to restrict children's ability to create accounts without the knowledge or consent of a parent or guardian, and parental controls are turned off by default. Because many parents are not even made aware that their children are playing on the app, parental controls are often entirely useless.

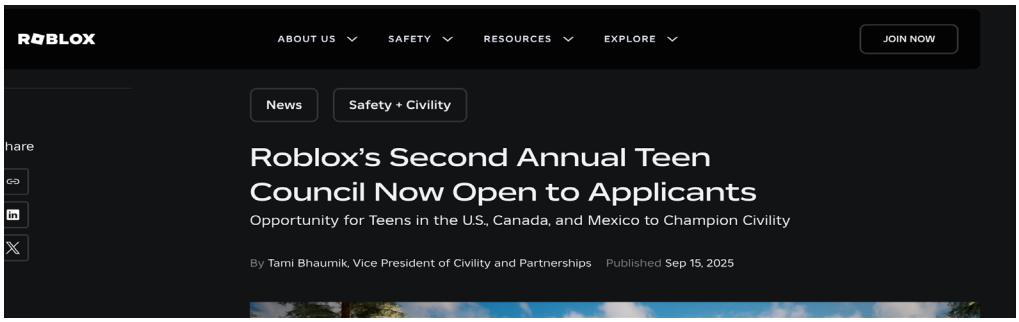
24. Even with all parental oversight settings enabled, parents continue to lack visibility as to who their child is messaging and what the messages say, leaving unaddressed Roblox's fundamental deficiency that facilitates grooming and predation on children—adult access to and communication with children.

25. Defendant has intentionally marketed Roblox to pre-teen children. It has advertised it as the "#1 gaming site for kids and teens" and an educational experience. Defendant claims that it provides "new gateways into learning" from "chemistry to physics to robotics and more, Roblox experiences bring concepts to life in ways that immerse learners and motivate exploration, play, and deep thinking."[19] These offerings, according to Defendant, include "high-quality, standards-aligned, immersive educational experiences designed by curriculum experts."[20]

Roblox webpage – "A New Era of Engaged Learning"

[19] *A New Era of Engaged Learning*, ROBLOX, https://corp.roblox.com/education (last visited Nov. 4, 2025).
[20] *Id.*

26. To this day, it continues to market to children. For example, Roblox currently hosts an annual "Teen Council" to include "young people from Canada and Mexico and the United States." This council "is an important part of our ongoing goal of fostering a safe and positive online environment for all of our users, including teens and young adults." The application process is open to "[u]sers age 14 to 17."[21]



27. Roblox's own Parents, Safety, and Moderation User Safety and Community Standards make clear that users under the age of 9, ages 9-13, and 13-17 are targeted users of the Roblox platform.[22]

28. It also sells physical Roblox toys such as action figures of characters in Roblox games via brick-and-mortar retailers in Texas and elsewhere.

C. Roblox Has Become Wildly Popular with Children and Adults

29. Roblox has grown substantially since its creation, but its popularity exploded during the COVID-19 pandemic when it was flooded with millions of new users, as people were confined to their homes and looking for social interaction. By September 2020, roughly 31.1 million people globally—more than half of them under 13—were on Roblox daily, making it the

[21] Tami Bhaumik, *Roblox's Second Annual Teen Council Now Open to Applicants*, ROBLOX (Sep. 15, 2025), https://corp.roblox.com/newsroom/2025/09/2026-roblox-teen-council.
[22] *Parents, Safety, and Moderation User Safety and Community Standards*, ROBLOX https://en.help.roblox.com/hc/en-us/articles/30428367965460-What-happens-as-I-get-older-on-Roblox (last visited October 8, 2025).

world's biggest recreational zone for kids.[23]

30. That growth has continued unabated, especially as it has been drawing proportionately more older users. In Roblox's 2024–25 Annual Report, the company reports an average of 82.9 million daily active users, with 20% under 9 years of age; 20% from 9–12 years of age; 16% from 13–16 years of age; and 44% at 17 years of age or over.[24]

31. 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.[25]

32. To satisfy the scrutiny and demands of public market investors, Defendant 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.

33. Today, Roblox is the most downloaded online game globally, and based on 2023 statistics, the average user spends 2.4 hours a day using Roblox.[26]

II. ROBLOX IS A PERFECT ENVIRONMENT FOR CHILD EXPLOITATION

A. For Years, Roblox Lacked Guardrails to Prevent Child Communication with Adult Predators, Child Exploitation, Addiction, and Inappropriate Content

34. Based on a combination of several factors—easy access for minors, avatar

---

[23] Roblox Corp., Registration Statement (Form S-1) at 3, 24 (Nov. 19, 2020).

[24] *2025 Proxy Statement and 2024 Annual Report*, ROBLOX CORP. (May 29, 2025), https://www.sec.gov/Archives/edgar/data/1315098/000155837025004965/rblx-20250331xars.pdf.

[25] Shannon Liao, *Roblox, The Game Company Made Wildly Popular by Kids, Goes Public with $41 Billion Valuation*, WASH. POST (Mar. 11, 2021), https://www.washingtonpost.com/video-games/2021/03/11/roblox-ipo/.

[26] *Roblox User and Growth Stats You Need to Know,* BACKLINKO (Aug. 12, 2025), https://backlinko.com/roblox-users#average-daily usage-on-roblox/.

anonymity, open and unregulated chat features, third-party content, and lack of guardrails—Roblox has created the perfect storm for CSAM and child exploitation.

35. At the outset, minor access to Roblox has been unregulated. Before November 2024 (*see infra*), when a child created a Roblox account, the default setting was for parental protections to be turned off. As a result, if a child made their own account and simply listed their age as 13 or older, then any "experience" was available to that child.

36. Further, Defendant's default setting for Roblox allowed adults to easily communicate with children. Adult strangers could "friend" and chat with a child of any age via direct (*i.e.*, private) message and invite a child to a private server or other "experiences" on the platform. And after entering an experience, users could chat with other users in the experience, whether or not they were friends. That is, the option to disable chat with strangers in experiences was turned off by default.

Examples of Roblox In-Gaming Chat

37. Yet another factor contributing to the unsafe design of Roblox is Defendant's failure to require age-appropriate designations on the millions of experiences created by third parties. Defendant did not want to invest the resources necessary to vet experiences designed by third parties, nor slow its growth by locking children out of experiences that were not appropriate for their age. Instead, Roblox turned a blind eye to the proliferation of inappropriate experiences on its platform in order to increase profits.

38. A developer can assign the "All Ages (Suitable to everyone)" rating to their experience with seemingly little-to-no verification of this self-designation by Defendant, giving children access to highly inappropriate experiences. As discussed below, the experiences in the "All Ages" category include a litany of instances of players mimicking sexual acts and avatar items rife with sexual content and innuendos. Further, most experiences are designated as "Suitable to everyone," eviscerating Defendant's purported age restriction safeguards as a practical matter.

39. Further, Defendant's scripting language, which allows developers to manipulate avatar activity and interactions any way they want, is often deployed to create scenarios where avatars engage in simulated sexual activity.[27] Thus, for years, there have been numerous reports of children's avatars experiences simulated sexual assault by other users' avatars, often adults. For example, in 2018, a seven-year-old girl's avatar was subjected to simulated rape by two male avatars on a playground in a Roblox experience, which was witnessed by the girl's mother.[28] In

---

[27] *See, e.g.,* RAVIORESINZ, *How to Do Roblox Sex Glitch*, (*YouTube,* Sep. 24, 2010) https://www.youtube.com/watch?v=Zz97Q1SQE_k; *see also* TELAMONJOHN, *Roblox Sex*?, (YouTube, Jul. 17, 2011), https://www.youtube.com/watch?v=hyqCHG6nUYI.

[28] Savannah Levins, *North Carolina Mom Outraged After Roblox Game Depicts Violent Acts, Including Rape*, WCNC CHARLOTTE (June 30, 2018), https://www.wcnc.com/article/news/local/north-carolina-mom-outraged-after-roblox-game-depicts-violent-acts-including-rape/275-569365001.

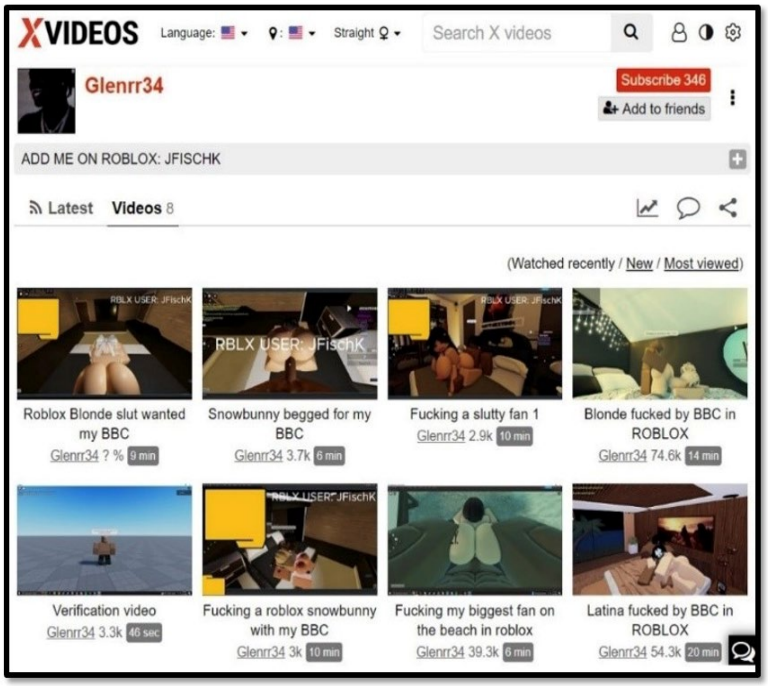
describing the aftermath of this traumatic experience, the girl's mother explained, "I never in my wildest dreams would've ever imagined that I would have to talk with my seven-year-old about rape."[29]

40. Roblox is designed in a way that allows the creation and distribution of virtual pornographic content, with Roblox providing tools and software that enable users to make virtual sex videos between avatars on Roblox. These pornographic videos have become popular on Roblox. These videos are clearly marked with the .rbxl file extension—Defendant's proprietary file format—establishing that this content was created within Roblox. Many Roblox uses record the pornographic videos they create on Roblox and publish them across the internet. For example, on XVideos, a pornographic website, Roblox users post the pornographic videos they create on Roblox and seek out other Roblox users to simulate sexual acts with them on Roblox within seemingly innocuous games, like Brookhaven, which is one of Roblox's most popular experiences and is designated appropriate for users ages five and up.[30]

---

[29] *Id.*

[30] *Brookhaven 🏡RP*, ROBLOX, https://www.roblox.com/games/4924922222/Brookhaven-RP (last visited Nov. 4, 2025) (showing that the experience has been saved by over 25 million users).



Roblox user advertises account on porn website, XVideos, where they had uploaded videos of their avatar having sex with other Roblox users.[31]

B. Third-Party Developers Upload "Experiences" Without Content Review, Leading to Influx of Inappropriate Content

41. As noted, the millions of experiences on Roblox are primarily created by third-party developers, who use tools that Defendant designs, controls, and promotes. Defendant's tools, which include scripting capabilities, 3D modeling systems, and other software, supply the infrastructure needed to create content for Roblox.

42. Defendant controls the way these tools are used and can place limitations and restrictions on them. Nonetheless, Defendant has provided grossly insufficient content review,

[31] *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, HINDENBURG RSCH. (Oct. 8, 2024), https://hindenburgresearch.com/roblox/.

leading to an influx of highly inappropriate content. As early as 2010, Roblox had begun hosting copious amounts of sexually explicit content.

43. Roblox has hosted 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, reveal nudity, and engage in disturbing simulated sexual activities with other Roblox users.[32]

44. Children can also play games like "Public Bathroom Simulator Vibe," which allows access to users as young as nine years old and enables users to simulate sexual activity in virtual bathrooms.[33] Roblox also hosts virtual strip club "experiences" where avatars perform sexually explicit acts, like giving lap dances to patrons.[34]

45. Below are a handful of the thousands of inappropriate "experiences" that users may see, ranging from explicitly sexual content (often involving pedophilia) to Nazi propaganda and violent extremism:

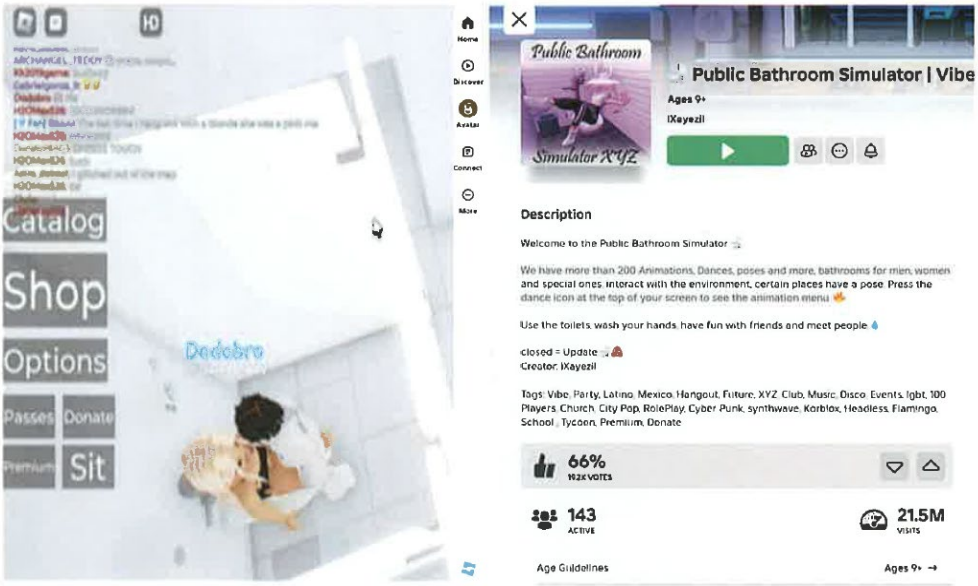
[32] EJ Dickson, *Inside the Underground Strip-Club Scene on Kid-Friendly Gaming Site Roblox,* ROLLING STONE (Sep. 12, 2021), https://www.rollingstone.com/culture/culture-features/roblox-virtual-strip-clubs-condo-games-sex-1197237
[33] HINDENBURG RSCH. *supra* note 31.
[34] Dickson, *supra* note 32.

Screenshot from a Roblox Strip Club "Experience"[35]

Screenshots from "Experiences" with Nazi and KKK Material[36]

[35] Tom Knowles, *Nazi Sex Parties Hosted on Children's Game Roblox*, THE TIMES (Feb. 16, 2022), https://www.thetimes.com/article/3fb8ff62-8e83-11ec-ab9b-59af3878ddff.
[36] Ben Ellery, *Roblox Safety Failings Leave Children at Risk, Claim Experts*, THE TIMES (Apr. 6, 2025), https://www.thetimes.com/uk/law/article/roblox-kk-swastikas-childrens-safety-fx5n6tcl7.

Screenshot from a Roblox Sex Simulation "Experience"[37]



Roblox's Public Bathroom Simulator "Experience"[38]

[37] *Roblox Isn't All Fun and Games*, NAT'L CTR. ON SEXUAL EXPLOITATION (Jun. 6, 2023), https://endsexualexploitation.org/articles/roblox-isnt-all-fun-and-games/.
[38] Hindenburg Research, *supra* note 31.

Screenshot from a Roblox "Experience"[39]

C. Avatars, Innocuous Designs, Unregulated Chats, and Online Currency Allow for Easy Access and Grooming by Predators

46. In addition to exposing children to harmful content, Roblox serves as the perfect access point to children for child predators and creates the ideal grooming environment. According to reports from non-profits that focus on child exploitation, Roblox "is being used as a first point of contact for predators."[40]

47. At the outset, children are trusting and naive, and they often do not recognize that many avatars are really adults, especially when those adults can easily approach them and lie about their age.

---

[39] James Clayton & Jasmin Dyer, *Roblox: The Children's Game with a Sex Problem*, BBC NEWS (Feb. 15, 2022), https://www.bbc.com/news/technology-60314572.

[40] *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).

Demonstration of how easy it was for a 42-year-old account to find a child user on Roblox and get the child to move the conversation to Snapchat.

48. Accordingly, as a *Bloomberg Businessweek* article titled *Roblox's Pedophile Problem* put it, "predators weren't just lurking outside the world's largest virtual playground. They were hanging from the jungle gym, using Roblox to lure kids into sending photographs or developing relationships with them that moved to other online platforms and, eventually, offline."[41] This conduct by predators is being done openly on Roblox.

49. Defendant's deceptive gaming service and unregulated profit-driven virtual currency system also exposes vulnerable children to sexual exploitation and abuse by predators who trade or extort Robux in exchange for explicit photos from children.

[41] Olivia Carville & Cecilia D'Anastasio, *Roblox's Pedophile Problem,* BLOOMBERG BUSINESSWEEK (Jul. 23, 2024), https://www.bloomberg.com/features/2024-roblox-pedophile-problem/.

50. Children frequently become obsessed with purchasing or otherwise obtaining Robux to buy items for their avatars and to spend in their favorite experiences on Roblox. In Defendant's Avatar Store, for example, the company sells "rare" items at astronomical prices, such as a type of hair for an avatar, which children seek to purchase to keep up with or outdo their peers on Roblox. As a result, children often tell others, including strangers, that they will do "Anything for Robux."[42]

51. In some situations, predators use Roblox to meet children and move communications to another app, such as Snapchat or Discord. Once there, predators escalate their exploitation and abuse by soliciting explicit material, like nude photos or videos of children doing sexually inappropriate acts. And while the ultimate solicitation of explicit photos or other criminal acts sometimes occurs on other apps, Roblox serves as the critical facilitator that enables these predators to first identify, target, groom, and gain the trust of young victims through its inadequate safety measures and failure to provide notice of its lack of safety measures.

52. As such, Roblox is deceptive and inadequately designed in myriad ways, including but not limited to the lack of an actual age verification process before 2023, Defendant's failure to ensure age-appropriate "experiences," Defendant's deceptive and inadequate monitoring, and Defendant's failure to warn parents and children of the dangers associated with Roblox, including but not limited to Roblox's sexploitation dangers.

[42] Carville & D'Anastasio, *supra* note 41.

D. Roblox Is Highly Addictive, Especially for Children, Keeping Them Constantly on a Platform Where They Are Spending Money and Are Exposed to Danger

53. To maximize profit, Defendant wants users to play as frequently as possible and for long periods of time.[43] Accordingly, Roblox was designed with highly addictive features, especially for children.

54. For one, Roblox's vast ecosystem means that there is always something new for children to explore, and the in-game prizes and achievements give them psychological "rewards." That, paired with the social aspects and "fear of missing out," makes the game highly addictive.[44]

55. Roblox is also ubiquitous and easily accessible, on multiple devices such as smartphones and tablets, computers and laptops, gaming consoles, and VR headsets. "This ubiquity means that children can play anytime, anywhere, making it challenging for parents to monitor and control usage."[45]

56. Moreover, Defendant enables and encourages third-party "experience" designers to create in-game rewards to maximize user engagement, quantified by daily login streaks and play session time.[46]

57. A recent study by researchers at the University of Sydney also revealed that children

---

[43] *Roblox 2025 Proxy Statement and 2024 Annual Report*, *supra* at 221 (describing "hours engaged" as a "key metric[]"); *id.* at 257 (linking "growth in hours engaged" to "the increasing value of [Roblox]").

[44] *How to Handle Your Child's Roblox Obsession: A Parent's Guide to Setting Boundaries and Regaining Control*, CTR. FOR INTERNET & TECH. ADDICTION (May 30, 2025) https://virtual-addiction.com/blog/why-roblox-is-so-addictive-for-kids-and-how-parents-can-regain-control/.

[45] *Id.*

[46] *Engagement Rewards*, CREATOR HUB, https://create.roblox.com/docs/resources/feature-packages/engagement-rewards (last accessed Oct. 9, 2025); *Introducing Creator Rewards: Earn More by Growing the Community,* CREATOR HUB, https://devforum.roblox.com/t/introducing-creator-rewards-earn-more-by-growing-the-community/3777628 (last accessed Oct. 9, 2025).

using Roblox struggle with complex and opaque in-game spending features, often leading to unintentional overspending.[47]

58. The study highlighted the ubiquity of predatory monetization features that take advantage of children's difficulty in mentally converting in-game currencies (which include not just Robux but often "nested" experience-specific currencies that must be purchased with Robux) to real money and employ deceptive or gambling-like mechanics that leave children feeling scammed—and in need of more Robux.[48]

59. Meanwhile, Defendant profits not only when users spend more time on the platform but each time they purchase Robux to use on it, because the company that sells Robux—Roblox Prepaid Company LLC—is directly controlled by and managed solely by Defendant.[49]

III. ROBLOX GETS FLOODED WITH INAPPROPRIATE CONTENT, YET CONTINUES TO WELCOME ADULTS FOR PROFIT AND REFUSES TO IMPLEMENT GUARDRAILS

A. During COVID-19, Roblox Gets Flooded with Adults, Who Are Welcomed by Defendant for Profit, Despite the Enhanced Risks Posed by Adults on a Child-Focused Platform

60. Despite recognizing the severe risks of exposing children to adults in an unregulated and unmonitored environment, Defendant *welcomed* an influx of adults after the COVID-19 pandemic and around the time of its public offering.

61. 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. Defendant therefore prioritized rapid growth in

[47] Taylor Hardwick et al., *"They're Scamming Me": How Children Experience and Conceptualize Harm in Game Monetization*, SSRN (Jan. 17, 2025), https://ssrn.com/abstract=5164006.
[48] *Id.*
[49] Roblox Corp., Exhibit 21.1 to Annual Report (Form 10-K) (Feb. 21, 2025).

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.

62. For example, in its public offering filings in 2021, Defendant identified "age demographic expansion" as a key strategy, explaining that it planned to develop experiences and content that appealed to older users.[50] For Defendant, "aging up" had benefits beyond user growth. It was also more profitable. Older users offered a distinct financial advantage. While children spend more hours on Roblox, they do not "monetize" as well because they are more constrained in their ability to spend. By contrast, older users, who "have more direct control over their spend" and "monetize better," are far more lucrative, an outcome that Defendant said it predicted when it started to target older users.[51]

63. Defendant's executives repeatedly emphasized their strategy of "aging up" Roblox to attract older users. At the company's inaugural conference with an investment bank in September 2021, Defendant's CFO, Michael Guthrie, noted that Defendant had achieved "very good penetration of nine-to twelve-year-olds," and was focused on adding users over the age of 13.[52] One plan was to "improve the search algorithms such that older users were finding older content," or content tailored to their age-related demographic.[53]

64. And at its annual Developer Conference, CEO David Baszucki encouraged developers to create experiences for older audiences, explaining that Defendant was rolling out

---

[50] Roblox Corp., S-1 (Securities Registration Statement) (Nov. 19, 2020).
[51] Roblox Corp., Q2 2022 Earnings Call (Aug. 10, 2022).
[52] *Goldman Sachs Communicopia*, ROBLOX (Sep. 21, 2021), https://ir.roblox.com/events-and-presentations/events/event-details/2021/Goldman-Sachs-Communicopia/default.aspx.
[53] *Id.*

features designed to appeal to older users, including use of real names, screen capture and sharing capabilities, video calls, and relaxed chat moderation.[54] These decisions, while framed as growth strategies, reflected Defendant's willingness to compromise safety, creating new vulnerabilities and more dangerous circumstances for children in its pursuit of a more profitable, older user base.

65. Defendant's executives consistently highlighted progress with the company's "aging up" strategy on every quarterly earnings call after this until the second quarter of 2023, when CEO Baszucki declared that Defendant had achieved its goal: "We're no longer talking about aging up. We are a platform for all ages."[55] He also revealed that developers had started to "build specific 17-plus experiences."[56] This progress was praised by Wall Street investment banks, who noted that aged-up experiences were a promising indicator of "potential sustainable growth tailwinds for Roblox," reinforcing the company's pivot toward maximizing profitability.[57]

66. At the same time, Defendant deprioritized safety measures even further so that it could report strong numbers to Wall Street. For instance, Defendant executives rejected employee proposals for parental approval requirements that would protect children on the platform because such requirements could drive users away. Employees also reported feeling explicit pressure to avoid any changes that could reduce platform engagement, even when those changes would protect children from predators.[58]

---

[54] ROBLOX, *Opening Keynotes | RDC (Roblox Developers Conference) 2023*, (YouTube, Sep. 8, 2023), https://www.youtube.com/watch?v=CwLThCghzA4.https://www.youtube.com/watch?v=CwLThCghzA4.
[55] Roblox Corp., Q2 2023 Earnings Conference Call (Aug. 9, 2023).
[56] *Id.*
[57] *Roblox Corp. (RBLX) PT Raised to $60 at Deutsche Bank*, STREETINSIDER.COM (Nov. 4, 2024), https://www.streetinsider.com/Analyst+Comments/Roblox+Corp.+%28RBLX%29+PT+Raised+to+%2460+at+Deutsche+Bank/23918435.html?classic=1 (quoting Deutsche Bank analyst Benjamin Black).
[58] HINDENBURG RSCH. supra note 31.

67. 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 Steet, which views trust and safety costs as detrimental to Defendant's stock performance. Barclays, for example, identified its "downside case" for Defendant's stock as "additional safety investments due to its younger demographic . . . becom[ing] a drag on [earnings] margins."[59] Barclays also wrote that it viewed increased safety costs as a "negative" in Defendant's quarterly earnings.

68. 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.

69. 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.[60] 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 AI, we see that as a high single-digit number over the next few years." He added, "we still think there's more to do there."[61]

---

[59] Complaint ¶ 98, *T.T. v. Roblox Corp.*, No. 4:25-cv-00314 (S.D. Iowa, filed in state court Aug. 5, 2025, removed Aug. 28) (quoting August 2024 Barclays investor report).
[60] Roblox Corp., Q4 2023 Earnings Call (Feb. 7, 2024).
[61] *Id.* (emphasis added).

70. At other times, Guthrie has reassured investors, stating, "look for trust and safety [costs] to scale below linear as we grow"[62] and that Defendant was "quite happy with" trust and safety costs growing "at a lower rate than our bookings growth."[63]

71. Similarly, in the second quarter of 2024, CEO Baszucki highlighted that, "[i]mportantly, our infrastructure and trust and safety expenditures were 8% lower year-on-year."[64]

72. Similarly, despite urging developers to build experiences intended for users aged 17 and older, Defendant did *not* implement any access restrictions for younger users.[65] Investors recognized the obvious connection between older users and increased risks for children, questioning how Defendant planned to prevent inappropriate content from reaching younger users. When asked by an equity research analyst about aged-13-and-up experiences for older users, CEO Baszucki admitted, "I want to highlight, right now, *we don't have any only 13-and-up experiences.* We have 28% of the top 1,000 experiences having a majority of 13 plus [users], but *those are still experiences that are open to all ages.*"[66]

73. But as one former Roblox employee explained, "You're supposed to make sure that your users are safe but then the downside is that, if you're limiting users' engagement, it's hurting our metrics. It's hurting the active users, the time spent on the platform, and in a lot of cases, the leadership doesn't want that."[67] 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."[68]

---

[62] Roblox Corp., Q4 2022 Earnings Conference (Feb. 15, 2023).
[63] Roblox Corp., Q3 2022 Earnings Conference Call (Nov. 8, 2023).
[64] Roblox Corp., Q2 2024 Earnings Conference Call (Aug. 1, 2024).
[65] Roblox Corp., Q4 2022 Earnings Conference Call (Feb. 15, 2023).
[66] Roblox Corp., Q3 2021 Earnings Q&A (Nov. 9, 2021) (emphasis added).
[67] HINDENBURG RSCH. supra note 31.
[68] HINDENBURG RSCH. supra note 31.

74. Not only did Defendant seek to increase adult users while knowing the risks that strategy posed to children, but it also sought to *encourage* relationships between users. At Defendant's 2023 Developers Conference, CEO Baszucki revealed Defendant's strategy to facilitate "real-life relationships" between users, *i.e.*, dating. While he deliberately avoided the word "dating," he then announced plans to build a gaming service to support it: "I'm not going to use the D word but subsequent[] real-life relationships is going to happen, okay? And we're going to build a platform to support that."[69]

75. By 2024, Baszucki explicitly acknowledged this strategy. He first acknowledged that online dating is "edgy" but then mocked his own safety team's concerns about the dangers—"the policy and safety told me [dating and real life relationships] isn't within our current policy right now"—to which the audience shared in laughter.[70]

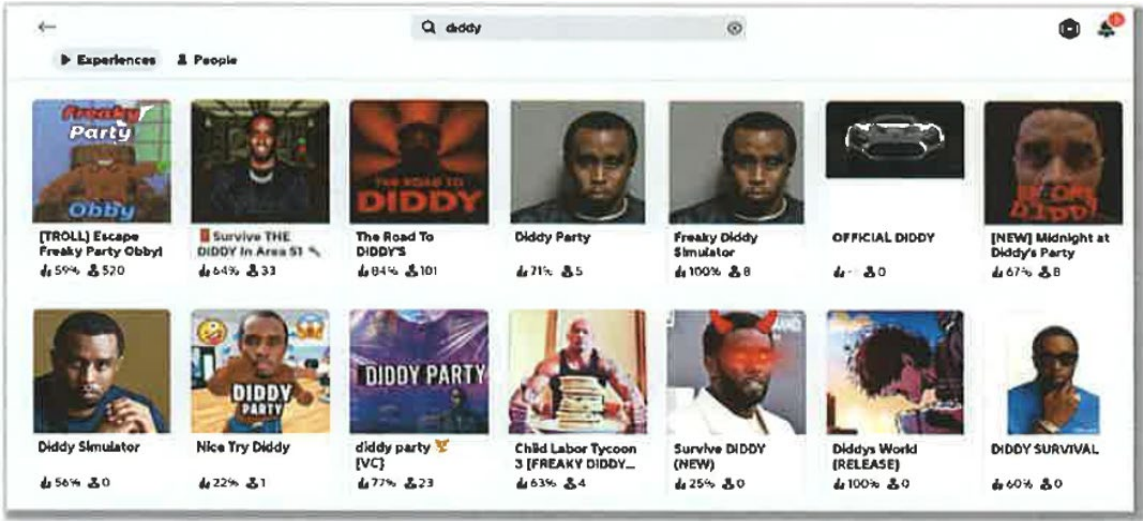
B. Since 2020, Roblox Has Been Flooded with Highly Inappropriate Experiences and Predators, Harming Texas Children

76. With an influx of teenagers, young adults, and older adults now on the platform, it is no surprise that there has been an influx of highly inappropriate content. A recent investigative report exposed a multitude of exploitative experiences on Roblox that recklessly trivialize and gamify serious criminal conduct, including rape. The report estimated that there are thousands of *inappropriate experiences* for children.[71] The report "even revealed a group of 3,334 members openly traded child pornography and solicited sexual acts from minors."[72]

---

[69] ROBLOX, *Opening Keynotes | RDC (Roblox Developers Conference) 2023*, (YouTube, Sep. 8, 2023), https://www.youtube.com/watch?v=CwLThCghzA4.
[70] ROBLOX, *2024 Roblox Developers Conference Highlights*, (YouTube, Sep. 6, 2024), https://www.youtube.com/watch?v=HwbcWc2CwnM.
[71] HINDENBURG RSCH., *supra* note 31.
[72] Attorney General Liz Murrill, *Louisiana Attorney General Liz Murrill files Child Protection lawsuit against popular game Roblox,* https://aglizmurrill.com/Article/322 (last visited Oct, 8, 2025).

77. For example, the report confirmed that Defendant actively hosts over 600 "Diddy" games, with titles like "Survive Diddy," "Run from Diddy Simulator," and "Diddy Party," which appear to recreate reported incidents involving the music mogul Sean Combs, publicly known as "Diddy." Diddy was federally indicted and found guilty of sex trafficking and other grievous criminal charges regarding allegations surrounding reports about "freak-off" parties—events which, according to testimony, multiple lawsuits, and media reports, allegedly involved forced drug use, violent assaults, and the sex trafficking of minors.[73]



Examples of Roblox Games Modeled after Diddy's Sex Trafficking Ventures

78. This report also revealed that Defendant has hosted *more than 900* Roblox accounts displaying variations of convicted sex trafficker Jeffrey Epstein's name, such as "JeffEpsteinSupporter," whose account Defendant knew was interacting with children on its servers.[74] Defendant also hosted games like "Escape to Epstein Island," which, again, is a title that directly references one of the locations where, for years, Jeffery Epstein brought minors and

[73] HINDENBURG RSCH., *supra* note 31.
[74] HINDENBURG RSCH., *supra* note 31.

other non-consenting individuals so he and others could sexually and physically abuse them.[75] Defendant has knowingly and recklessly designed, hosted, and enabled an online platform marketed to children with rampant, sexually exploitative experiences.

79. The results have been devastating for Texas children.

80. For example, one lawsuit brought by the parent of a Texas child alleges that the child was raped after being groomed through Roblox and the messaging platform, Discord.[76]

81. Another lawsuit was filed in May of this year, in Galveston County alleging Roblox did not protect a teen who was sexually assaulted by someone she met on the platform when she was only 13.[77]

82. And, just last month, a lawsuit was filed in Harris County, Roblox's design makes it easy for pedophiles to prey on the child plaintiffs.[78]

IV. Despite Knowing the Severe Dangers and Reports of Abuse, Roblox Continues to Deceptively and Falsely Market Safety

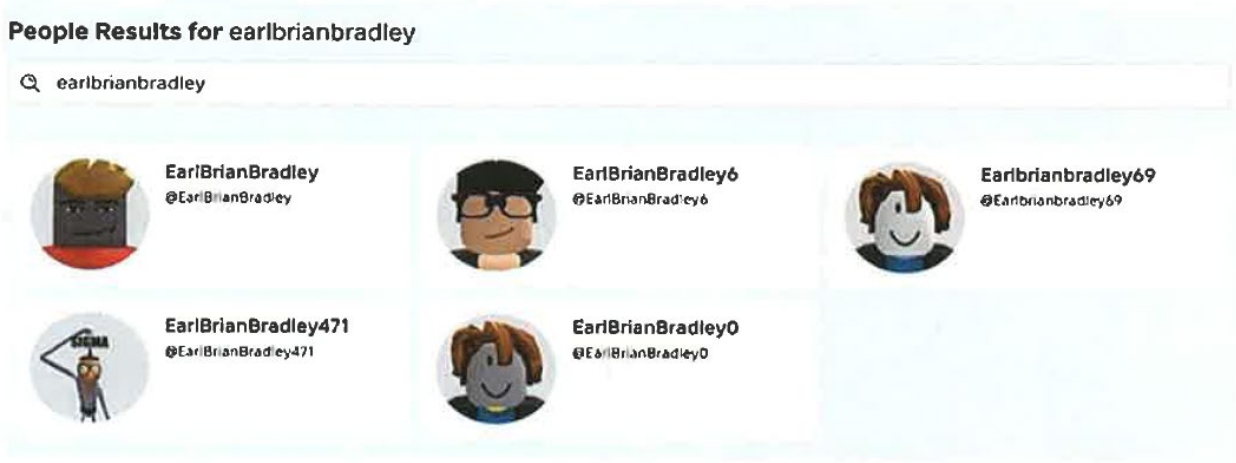
A. Roblox Has Long Been Aware of CSAM and Abuse

83. Through numerous well-documented and publicized cases, Defendant has long been aware that Roblox has enabled and facilitated the systemic sexual exploitation and abuse of children. For years, countless children have been sexually exploited and abused by predators as a result of Defendant's deceptive conduct.

84. Many predators do not even hide their intentions, roaming Roblox with usernames like "@igruum_minors," "@RavpeTinyKldsJE," and "@EarlBrianBradley"—a reference to one

[75] HINDENBURG RSCH., *supra* note 31.
[76] Complaint, *Doe v. Roblox Corp.*, No. 3:25-cv-00128 (S.D. Tex filed Apr. 30, 2025).
[77] Briahn Hawkins, *Texas Family Sues Roblox, Discord After Daughter Sexually Assaulted by Man She Met Online*, KHOU 11 NEWS (May 3, 2025), https://www.khou.com/article/news/local/texas-lawsuit-roblox-discord/285-ea17aa89-62bb-4bb5-8877-266b82f7efb7.
[78] *Id.*

of the most prolific pedophiles ever, who raped and molested hundreds of children.[79] Defendant is aware of the users using such highly inappropriate usernames, but it does not take sufficient steps to flag them or shut them down.



Results from an Account Search for "earlbrianbradley"

[79] HINDENBURG RSCH., *supra* note 31..

Public Chat Wall for a Group Named "Adult Studios," Where Users Openly Solicited Child Sexual Abuse Material

85. Leaked internal Roblox documents reveal that Defendant not only actively monitored this type of content, but it 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), and whether players could be nude.[80]

B. Rather than Implement Reasonable and Industry-Standard Safeguards, Defendant Made the Platform Even More Dangerous

86. Until November 2024, adult strangers could "friend" and chat with children of any age via direct messages and chat with them in an experience through direct messages even if they were not friends. While the Defendant offered some adjustable parental controls for users under the age of 13, these controls could be bypassed by creating an alternate account that identified as a user over 13 years old. By designing Roblox this way, Defendant stripped parents of basic protective options to prevent adult strangers from communicating with their children.

87. This practice contrasts sharply with other gaming services like Nintendo, which use preprogrammed dialogue options to tightly control user interactions.[81] 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.

---

[80] 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/.
[81] Carville & D' Anastasio, *supra* note 41.

88. Defendant further endangered children by introducing voice calls in November 2023. Called "Roblox Connect," this virtual call feature allows users to have a conversation through their avatars in real time. Safety concerns were immediately raised about this feature. For example, one user emphasized, "This is a bad idea Roblox, and especially on your platform because this is where most predators are coming from, and it makes it way easier for predators to prey on children."[82]

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

90. Defendant could have also required children under 13 to provide their names and email addresses and obtain parental approval—a fundamental protection against predators—but refused to do so. This decision allowed the company to bypass certain protections that are mandated by federal law and designed to protect children. The Children's Online Privacy Protection Act ("COPPA") prohibits companies like Defendant from collecting, using, or disclosing the personal information of children under 13 without verifiable parental consent. COPPA was enacted because Congress recognized the heightened vulnerability of children on the internet. As the Federal Trade Commission ("FTC") noted, children have a limited capacity to "understand fully the potentially serious safety and privacy implications" of sharing their personal information.[83]

---

[82] 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/.

[83] FEDERAL TRADE COMMISSION, PRIVACY ONLINE: A REPORT TO CONGRESS at 6 (1998), https://www.ftc.gov/sites/default/files/documents/reports/privacy-online-report-congress/priv-23a.pdf.

91. The FTC has outlined clear and acceptable methods for obtaining verifiable parental consent. These include: (a) providing a form for parents to sign and return; (b) requiring the use of a credit card or online payment that notifies parents of each transaction; (c) connecting parents to trained personnel via video conference; (d) offering a staffed toll-free number for parental verification; (e) asking knowledge-based questions to confirm identity; and (f) verifying a parent's photo-ID by comparing it to a second photo using facial recognition technology.[84]

92. Yet instead of implementing safeguards to comply with COPPA, Defendant chose to bypass these protections altogether. Defendant intentionally avoids requesting a name or email address during sign-up to sidestep the requirement of verifiable parental consent.[85] Consequently, creating a Roblox account is alarmingly easy, requiring less than sixty seconds and no meaningful oversight, a choice that prioritizes growth over the safety of its youngest users.

93. Another easy-to-implement feature that would have improved safety is adding pop--up safety notices within chats and games to warn users about their behavior or the dangerous behavior of others. But Defendant's executives also rejected this change.[86]

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

---

[84] *Children's Online Privacy Protection Rule: A Six-Step Compliance Plan for Your Business*, FEDERAL TRADE COMMISSION, https://www.ftc.gov/business-guidance/resources/childrens-online-privacy-protection-rule-six-step-compliance-plan-your-business (last visited Nov. 4, 2025).

[85] 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.

[86] Carville & D' Anastasio, *supra* note 41.

This enables predators identified and banned by Defendant to simply switch to another account or re-join Roblox by creating a new one.

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

96. Defendant also opted not to require users to verify their age by uploading a picture of either their or their parents' ID, a practice that many other applications employ. Doing so would have restricted the content available to young users and prevented predators from easily mispresenting their age, which is often their approach in targeting and grooming children. As one father told the press after seeing other users solicit his avatar for sex, "There is nothing to stop adults going on there and pretending they're kids."[87]

97. Defendant intentionally and/or knowingly has ineffective safeguards in place, allowing 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.[88]

C. Defendant Falsely and Deceptively Represented Itself as Safe

98. Despite knowing of the risks and actual examples of child exploitation, Defendant recognized that its success and continued growth hinged on constant assurances to parents that

[87] Complaint ¶ 84, *Commonwealth of Kentucky v. Roblox Inc.*, No. 25-CI-00868 (Madison Cnty. Cir. Ct., filed Oct. 6, 2025) (quoting an article by U.K. newspaper The Sun that has been taken down).
[88] 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-pom.

Roblox is safe for children.[89] Accordingly, throughout its history, Defendant has falsely advertised itself as safe and has done so in every forum possible, including on its website, in the app stores where Roblox is available for download, through public promises of its highest executives, in news articles, on podcasts, and through other mediums.

99. Over the years, for example, Defendant has repeatedly stated that Roblox is safe for children and has misrepresented the safety controls it has in place. As early as 2007, Defendant's website assured parents that Roblox is an "online virtual playground . . . where kids of all ages can safely interact, create, have fun, and learn."[90]

100. From 2008 to 2016, Defendant's 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."[91]

101. 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 false.[92]

102. Defendant has consistently tried to paint Roblox as "family friendly" and safe for children of all ages. In 2017, Defendant began declaring that it "take[s] kids' safety and privacy very seriously" and "strive[s] to continually develop new and innovative technologies that will

---

[89] Kerry Breen, Experts users warn about explicit content on popular gaming platform Roblox, TODAY.COM (Oct. 20, 2021), https://www.today.com/parents/roblox-expe1ts-users-warn-aboutinappropriate-content-t235027.
[90] *Frequently Asked Questions (FAQs),* ROBLOX, https://web.archive.org/web/20071016081328/http://www.roblox.com:80/Parents/RobloxGuide.aspx (archived Oct. 16, 2007).
[91] *Keeping Kids Safe*, ROBLOX, https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx (archived May 1, 2008).
[92] *Id.*

protect the safety of our community while allowing players to imagine, create, and play together in a family- friendly environment." [93]

103. Defendant similarly has advertised Roblox as "a safe, moderated place to meet, play, chat, and collaborate on creative projects."[94]

Excerpt from Roblox Parents' Guide in 2017

104. Again in 2023, Defendant assured parents that it "continually develop[s] cutting-edge technologies to ensure that the Roblox platform remains a safe and fun space for players all over the world."[95] 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."[96] Defendant emphasized that it is "committed to ensuring that Roblox is a safe and fun place for everyone."[97] According to Defendant, it "goes above and

---

[93] *Parents' Guide*, ROBLOX, https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/ (archived Jul.16,2017).
[94] *Id.*
[95] *For Parents*, ROBLOX, https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/(archived Apr. 5, 2023).
[96] *Id.*
[97] *Roblox FAQ*, ROBLOX https://web.archive.org/web/20230328011957/https://corporate.roblox.com/faq/ (archived Mar. 28, 2023).

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."[98]

105. Defendant has claimed that: "Safety is in our DNA: when Dave Baszucki and Erik Cassel launched Roblox in 2006, they spent a few hours each day with the community, helping to ensure that Roblox was a safe and welcoming environment. Safety was their top priority, and they made constant improvements in their moderation, both for content and for communication on the platform."[99]

106. To this day, Defendant's website contains similar assurances. According to the current website, Defendant "won't allow language that is used to harass, discriminate, incite violence, threaten others, or used in a sexual context."[100] It touts a "stringent safety system and policies," which includes its "expertly trained team with thousands of members dedicated to protecting our users and monitoring for inappropriate content"[101]; its "safety review of every uploaded image, audio, and video file…by a large team of human moderators and machine detection before they become available on our platform"; and its chat filters for inappropriate content, which "are even stricter" for children under 13 and "include any potentially identifiable

---

[98] Roblox, *Roblox & User Data FAQ,* https://en.help.roblox.com/hc/en-us/articles/4406238486676-Roblox-User-Data-FAQ (last visited May 5, 2025).
[99] Complaint ¶ 34, *Doe v. Roblox Corp.,* No. 25-CIV-01193 (San Mateo Cnty. Super. Ct., filed Feb. 12, 2025) (quoting a webpage that Roblox has since taken down).
[100] Roblox, *Safety Features: Chat, Privacy & Filtering,* https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering (last visited May 5, 2025).
[101] Roblox's most recent annual report states, however, that it has only 2,474 full-time employees in total, of which only 1,800 were in product and engineering functions. This means that the number of employees whose dedicated role is content moderation, a subset of product and engineering, cannot plausibly be in the "thousands." ROBLOX CORP., *supra* note 24, at 31.

personal information, slang etc."[102]

107. Defendant also misrepresents Roblox's safety for children to the app stores on which it is available for download in order to have Roblox listed with a "12+" rating suitable for children.

108. Defendant is required to submit its Roblox application to Apple's App Store in order for it to be made available to consumers there. As part of the initial submission process and whenever it submits a new version of the Roblox application, Apple requires Defendant to self-report certain details about the content and capabilities of its Roblox application, including questions assessing its appropriateness for children.

109. Part of the App Store's age-rating process includes a series of content categories. For each category, the application developer is prompted to select "the level of frequency for each content description that best describes your app," choosing between "none," "infrequent/mild," and "frequent/intense." The content categories include the topics "Alcohol, Tobacco, or Drug Use or References," "Sexual Content or Nudity," "Mature/Suggestive Themes," and "Profanity or Crude Humor."

110. When application developers answer the age-rating prompts, the App Store generates a recommended age rating. One such age rating is the "12+" rating. Applications with a "12+" rating are appropriate for consumers ages twelve and older. Apple defines its "12+" rating by saying that applications with that rating may contain "infrequent mild language" or "mild or infrequent mature or suggestive themes."[103]

---

[102] *Safety & Civility at Roblox*, ROBLOX, https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox (last visited Nov. 4, 2025).
[103] *Get Started: Age Ratings*, APPLE, https://apple.co/3ydIBeh (last visited Oct. 10, 2025).

111. Currently, Roblox displays a "12+" rating in the App Store, and its App Store profile contains the following explanations and descriptions related to that rating: "Infrequent/Mild Horror/Fear Themes," "Infrequent/Mild Realistic Violence," "Frequent/Intense Cartoon or Fantasy Violence."[104] There is no warning about "Sexual Content or Nudity," "Mature/Suggestive Themes," and "Profanity or Crude Humor," which indicates that Defendant self-reported each of those categories as "none."[105]

112. At all times relevant, Defendant was aware that the result of its self-reported answers to the App Store's age-rating questions would be to generate an age rating that would be prominently displayed for consumers on Roblox's App Store profile. Defendant's representations were highly misleading given how frequently sexual content, nudity, mature and suggestive themes, and profanity and crude humor appear on the platform.

113. Similarly, Defendant is required to answer age-rating questions before making its application available for download in Google's "Google Play" store and Microsoft's "Microsoft Store." In both of these alternate fora, Defendant has claimed a "T" for "Teen" rating. A "T" for "Teen" rating is defined as: "Content is generally suitable for ages 13 and up. May contain violence, suggestive themes, crude humor, minimal blood, simulated gambling and/or infrequent use of strong language."[106] By contrast, an "M" for "Mature" rating is defined as: "Content is generally suitable for ages 17 and up. May contain intense violence, blood and gore, sexual content and/or strong language."

---

[104] *Roblox*, APP STORE, https://apple.co/3SQAI6f (last visited Oct. 10, 2025).
[105] *Id.*
[106] Apps & Games Content Ratings on Google Play, GOOGLE PLAY, https://support.google.com/googleplay/answer/6209544?visit_id=638957039552556870-3865757&p=appgame_ratings&rd=1#zippy=%2Cnorth-south-america (last visited Oct. 10, 2025).

114. Defendant's application contains frequent and intense sexual content and strong language, and according to the age-rating definitions supplied by the Google Play and Microsoft Stores, Defendant does not qualify for any age rating below "M" for "Mature." By claiming a "T" for "Teen" rating, Defendant misleads and deceives Texas consumers.

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

116. For example, in 2009, a blogger wrote about blocking Defendant because he doubted its safety for his children. CEO David Baszucki responded to the blogger reassuring him that Defendant flags "obviously offensive content" and removes it, and if "something is marginal, but gets flagged as inappropriate," Roblox "investigate[s] immediately."[107]

117. 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.[108]

118. Tami Bhaumik, Defendant's current Vice President of Civility & Partnerships, has doubled down on these promises in statements to parenting magazines, news outlets, and

---

[107] Eric Frenchman, *Revisiting Roblox*, PARDON MY FRENCH (Oct. 5, 2009), https://web.archive.org/web/20091217194609/http://pardonmyfrench.typepad.com/pardonmyfrench/2009/10/revisiting-roblox.html (archived Oct. 5, 2009).

[108] Tony Sims, *Interview with David Baszucki, Founder & CEO of Roblox*, WIRED (Feb. 7, 2013), https://www.wired.com/2013/02/roblox/.

podcasts, which are all aimed at persuading parents to let their children use Roblox. She also has contacted international online safety experts in an effort to sell Roblox's safety story.

119. In 2018, Bhaumik told the *Washington Post* that Defendant "focus[es] on making sure that everything is done in a safe and appropriate way."[109] 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."[110] She further boasted that Defendant 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."[111]

120. In 2019, while presenting on a "Digital Civility Panel," Bhaumik emphasized that "[w]e make sure there's a safe environment," citing Defendant's "tremendous reporting system" and "incredible moderation and CS team that reacts very, very quickly."[112] On that same panel, 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." She added later, "It's still very early days for us. This whole digital civility focus for Roblox is still there, we're just still establishing it."[113]

121. In a 2021 interview with *Axios*, Roblox's CEO, David Baszucki, stated, "Everything

---

[109] Hayley Tsukayama, *Roblox, an Online Kids Game, Explains How a Hack Allowed a Character's Virtual 'Rape'*, WASH. POST (Jul. 17, 2018), https://www.washingtonpost.com/technology/2018/07/17/roblox-an-online-kids-game-explains-how-hack-allowed-characters-virtual-rape/.
[110] 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), thesun.co.uk/news/5445444/roblox-app-children-danger-sex-warning/.
[111] *Id.*
[112] THOUGHTWORKS, *Digi[t]al Civility Panel - Anne Collier, Maura Tuohy Di Muro, Tami Bhaumik, Matt Soeth* (YouTube, Oct. 23, 2019), https://www.youtube.com/watch?v=XoUs1Js7WG0.
[113] *Id.*

is reviewed by over 2,000 real life humans, in addition to all the cool ML [Machine Learning] and AI [Artificial Intelligence] stuff."[114]

122. 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."[115] 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 is constantly taking a look at chat filters."[116] 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."[117]

123. Baszucki and Bhaumik's representations with respect to Roblox's moderation practices, combined with language on Roblox's website that a "large team of human moderators" performs a "safety review of every uploaded image, audio, and video file," created—as Roblox intended—the false impression that it conducts a human review of all third party content, including experiences, before making content available to users.[118]

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

---

[114] Ina Fried, *Roblox CEO: Human Reviewers Are Key to Keeping the Metaverse Safe*, AXIOS (Jun. 6, 2021), https://www.axios.com/2021/06/06/roblox-ceo-human-reviewers-metaverse.
[115] BEDFORD COUNTY SHERIFF'S OFFICE VA, *Roblox: How to Help Kids Use It SAFELY Roblox's VP of Digital Civility & Partnerships Tami Bhaumik* (Facebook, Feb. 2, 2022), https://www.facebook.com/bedford.sheriff/videos/roblox-how-to-help-kids-use-itsafelyrobloxs-vp-of-digital-civilitypartnerships/1338989609901259/.
[116] INTO THE METAVERSE, *EP.21: Tami Bhaumik (Roblox) - Building a Safe & Resilient Metaverse*, (YouTube, Sep. 13, 2022), https://www.youtube.com/watch?v=LT5_bBOYS9A.
[117] *Id.*
[118] Roblox, s*upra* note 102.

125. In a 2024 blog post on Defendant's website, 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."[119] 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." A few months later, he added, "Safety is and always has been foundational to everything we do at Roblox."[120]

126. In a later blog post, Kaufman touted Defendant's "track record of putting the safety of the youngest and most vulnerable people on our platform first."[121]

127. Defendant's public statements and promises that it has made over the years and continues to make to date are carefully crafted to paint the picture of a digital playground that is safe and appropriate for children. When parents, the press, or child advocates raise questions and concerns, the company's highest executives respond with comforting promises of safety that are empty, patently false, and do not reflect reality.

128. 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 ("FOSI"). An online parenting magazine favorably quoted Stephen Balkam, FOSl's

---

[119] Matt Kaufinan, Chief Safety Officer, *Driving Civility and Safety for All Users,* ROBLOX (Jul. 22, 2024), https://corp.roblox.com/newsroom/2024/07/driving-civility-and-safety-for-all-users.
[120] Matt Kaufinan, Chief Safety Officer, *Major Updates to Our Safety Systems and Parental Controls*, ROBLOX (Nov. 18, 2024), https://corp.roblox.com/newsroom/2024/11/major-updates-to-our-safety-systems-and-parental-controls.
[121] Matt Kaufman, Chief Safety Officer, *Scaling Safety and Civility on Roblox,* ROBLOX (Apr. 4, 2024), https://corp.roblox.com/newsroom/2024/04/scaling-safety-civility-roblox.

CEO, as endorsing Defendant's new features as a win for child safety.[122] 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.[123] This calculated relationship exposes how Defendant manipulates public perception by using seemingly independent safety organizations as mouthpieces to shape the narrative in its favor.

129. Roblox's campaign of reassurance masks the truth. Far from creating a safe place for children, Defendant knowingly designed, built, and maintains Roblox in a manner that lacks safety features to protect children from predators and lacks warnings for parents and child users.

130. The result is that Defendant, through its failure to implement adequate safety features and its failure to provide notice of the danger, provides the perfect place for pedophiles.

131. For convenience, the chart below summarizes some of the misleading statements outlined above:

[122] Anna Halkidis, *What Roblox's Latest Changes Mean for Your Kids' Online Safety,* Parents (Nov. 18, 2024), https://www.parents.com/roblox-new-parental-controls-8747405.
[123] *FOSI Welcomes Roblox Vice President as New Board Chair*, FAMILY ONLINE SAFETY INST. (Oct. 12, 2022), https://fosi.org/fosi-welcomes-roblox-vice-president-as-new-board-chair/.

Promises to Parents	Reality
"Kids of all ages can **safely** interact" Roblox is "a safe, moderated place"	Roblox has known of pervasive sexual predators on its platform since at least 2010
"We take **every precaution possible** to make sure kids are protected from inappropriate and offensive individuals"	Permits adults to message children, and migrate interactions off-platform No age verification; No minimum age; No effective parental controls Allows proliferation of highly graphic in-game experiences without content designations or age restrictions Markets to pre-teens Overlooks open child predators and lets banned users rejoin the platform by making a new account Rejected safety warnings Encourages adult users and "dating"
"Won't allow language ... **used in a sexual context"**	Sexual language, solicitation, and exploitation are rampant
"We prohibit content **that depicts sexual activity** or seeks real world romantic relationships"	"Experiences" include "strip club," "public bathroom," "Diddy" "Epstein" Roblox avatars can remove clothes and simulate sex
"Every uploaded image" reviewed "by a large team of human moderators and machine detection before they become available" "**Everything is reviewed by over 2,000 real life humans"** "Expertly trained team with thousands of members dedicated to protecting our users and monitoring for inappropriate content"	Content moderation is slow, ineffective, and easily circumvented Content moderation teams are woefully understaffed and underfunded

V. ROBLOX HAS CAUSED WIDESPREAD HARM THROUGH ADDICTION, MENTAL HEALTH ISSUES, AND CHILD ABUSE

A. Experts Agree That Using Roblox Is Addictive and Harmful to Children

132. The effects of Roblox have been devastating on children around the country.

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

134. Studies support this connection. One study found that playing games with sexualized content was linked to increased rates of sexual harassment, suggesting that such exposure desensitizes players to the real-world consequences of these actions. Another study showed that playing mature-rated games was associated with higher rates of risky sexual behavior years later, highlighting the long-term impact of exposure to sexualized or exploitative content.[124]

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

[124] Jay G. Hull, et al., *A Longitudinal Study of Risk-Glorifying Video Games and Behavior Deviance*, 107(2) J. PERS. SOC. PSYCH. 300 (Aug. 2014), https://pmc.ncbi.nlm.nih.gov/articles/PMC4151190/pdf/nihms617012.pdf.

B. Numerous Children Have Been Abused by Predators on Roblox, Both in the Online Universe and In Real Life

136. The dangerous content on Roblox is not limited to mental health, but extends to child pornography, child grooming, and actual physical abuse.

137. The recent investigative report discussed above found that a basic search for "adult" in Roblox revealed a group with 3,334 members "openly trading child pornography and soliciting sexual acts from minors."[125] And tracking these members unearthed additional Roblox groups engaged in the same criminal conduct, including one massive group with 103,000 members.[126] Yet, Defendant failed to implement any age restrictions on these criminal groups or remove them entirely, deliberately leaving them accessible to all users.[127]

138. As a result of Defendant's failures, many children have been seriously abused and harmed on Roblox. For example, in May 2025, federal prosecutors in New York charged 40-year-old Tony Rodriguez of Fairport with enticement and possession of child pornography after he allegedly used Roblox and social media platforms to contact minors for sex. According to the U.S. Attorney's Office, Rodriguez arranged meetings with individuals he believed were 11- and 13-year-old girls, sent lewd images, and possessed child pornography; he was arrested following an FBI-led investigation.[128]

139. Similarly, a Maryland man who used Roblox to meet young girls and extort them to send him sexually explicit photographs and videos of themselves recently pled guilty to two counts

---

[125] HINDENBURG RSCH., *supra* note *31.*
[126] *Id.*
[127] *Id.*
[128] *Fairport Man Who Used Roblox to Attempt to Communicate with Minors for Sex Arrested*, U.S. DEP'T OF JUSTICE (May 6, 2025), https://www.justice.gov/usao-wdny/pr/fairport-man-who-used-roblox-attempt-communicate-minors-sex-arrested.

of producing child sexual abuse material,[129] an Ohio man was arrested and charged with coercion and enticement of a minor after exchanging sexually explicit photos with a minor male victim he met using Roblox,[130] and a Delaware man was recently sentenced to 20 years in prison for coercion and enticement of a minor he communicated with via Roblox.[131]

140. Roblox has also facilitated the efforts of a child exploitation network known as "764" to find and groom vulnerable children before coercing them into producing explicit sexual and self-harm material.[132]

141. Multiple Texas families have also filed suit after their children were victimized through Roblox. In October 2025, a lawsuit was filed in Harris County alleging that Roblox's platform design makes it easy for sexual predators to identify, contact, and groom children for exploitation. A Texas teenager met a predator through Roblox and was later assaulted, with the complaint alleging Roblox's inadequate safeguards and deceptive safety representations enabled the abuse.[133]

---

[129] *Silver Spring Man Pleads Guilty to "Sextortion" of More Than 100 Minors Located Throughout the United States and Abroad*, U.S. ATTORNEY'S OFFICE, DISTRICT OF MARYLAND (May 21, 2025), https://www.justice.gov/usao-md/pr/silver-spring-man-pleads-guilty-sextortion-more-100-minors-located-throughout-united.

[130] *FBI Cincinnati Announces Arrests as Part of Nationwide Operation Restore Justice*, FBI Cincinnati Field Office (May 7, 2025), https://www.fbi.gov/contact-us/field-offices/cincinnati/news/fbi-cincinnati-announces-arrests-as-part-of-nationwide-operation-restore-justice.

[131] *Delaware Man Sentenced to 240 Months for Coercing 11-Year-Old New Jersey Resident to Travel to Delaware for Sexual Activity*, U.S. ATTORNEY'S OFFICE, DISTRICT OF DELAWARE (Jul. 5, 2025), https://www.justice.gov/usao-de/pr/delaware-man-sentenced-240-months-coercing-11-year-old-new-jersey-resident-travel.

[132] Theo Burman, *FBI Warns of Disturbing '764' Group Targeting Children*, NEWSWEEK (May 7, 2025), https://www.newsweek.com/fbi-warning-764-group-targeting-children-2069050; *Leaders of 764 Arrested and Charged for Operating Global Child Exploitation Enterprise*, U.S. ATTORNEY'S OFFICE, DISTRICT OF COLUMBIA (Apr. 30, 2025), https://www.justice.gov/usao-dc/pr/leaders-764-arrested-and-charged-operating-global-child-exploitation-enterprise.

[133] Complaint, *Doe v. Roblox Corp.*, No. 3:25-cv-00128 (S.D. Tex filed Apr. 30, 2025).

142. Earlier, in May 2025, a Galveston County family sued Roblox after their 13-year-old daughter was sexually assaulted by an adult she met on the platform, alleging Roblox failed to protect minors despite its public claims of safety.[134]

143. Parents of children harmed by predators on Roblox have also sued for civil damages. An Iowa family recently sued Roblox Corporation, alleging the platform enables child sexual exploitation after their 13-year-old daughter was groomed on Roblox and later kidnapped, trafficked, and sexually abused by a 37-year-old man in Tennessee.[135]

144. A New Jersey mother and daughter also sued Roblox in Camden County Superior Court, alleging the platform enabled the sexual exploitation of the girl, who was targeted at age 11 by an adult posing as a child on Roblox. The lawsuit claims Roblox misrepresented its safety protocols and created "a playground for pedophiles," while the abuse allegedly began on Roblox and continued on Discord.[136]

VI. Only After Facing Legal Pressure, Roblox Implements Policy Changes—But They Are Insufficient and Too Late

A. In November 2024, Roblox Begins to Implement Policy Changes

145. Defendant's systematic endangerment of children has been publicly condemned by leading advocacy organizations. The National Center on Sexual Exploitation ("NCSE") has consistently named Roblox to its "Dirty Dozen" list, which is an annual campaign exposing companies that facilitate, enable, or profit from sexual exploitation. The NCSE blasts Roblox for

---

[134] Hawkins, *supra* note 77.

[135] *Iowa Family Sues Roblox, Alleging Gaming Platform Enables Child Sexual Exploitation After Kidnapped Child Found in Jefferson County*, 10 NEWS (Oct. 6, 2025) https://www.wbir.com/article/news/crime/iowa-family-sues-roblox-enables-child-sexual-exploitation-a-kidnapped-child-found-jefferson-county/51-e93a171f-c1a3-426f-a231-8e32cb9bdc2d.

[136] Leland Pinder, *South Jersey Family Sues Roblox, Discord Alleging Child Sexploitation on the Social Platforms*, 6 ABC (Sep. 25, 2025) https://6abc.com/post/new-jersey-family-sues-roblox-discord-alleging-child-sexploitation-social-platforms/17883959/.

"treat[ing] child protection like a game." According to the NCSE, "[u]ntil basic child protection standards are met, Roblox remains too high risk for kids."[137]

146. Parent reviews of Roblox on sites like *Common Sense Media* also document disturbing incidents of naked avatars, sexting, simulated sexual assault, and adult predators.[138]

147. Only after years of this mounting pressure—and dozens of private lawsuits—did Defendant announce changes to its child safety features. These changes were prompted not by the years of reports and widespread media coverage but by a scathing report published by a well-known short seller accusing the platform of being a "pedophile hellscape for kids."[139] Released on October 8, 2024, the report sparked public outrage, detailing many of the issues described above that Defendant had long ignored.

148. A little more than a month later, Defendant announced a series of alleged changes, including removing the ability to message others outside of experiences for under 13-year-old users[140]; giving parents a separate dashboard where they can monitor a child's Roblox account; viewing the child's friend list; setting spending controls; managing screen time[141]; 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.[142]

---

[137] HINDENBURG RSCH., *supra* note 31.
[138] *Parent Reviews of Roblox*, COMMON SENSE MEDIA, https://www.commonsensemedia.org/website reviews/roblox/user-reviews/adult (last visited Nov. 4, 2025).
[139] HINDENBURG RSCH., *supra* note 31.
[140] *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/.
[141] 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.
[142] *Id.*

149. These changes could all have been implemented years ago. None of them involve any new or groundbreaking technology. Defendant only implemented these changes when its stock was threatened.

B. In Mid-2025, Roblox Implements Further Policy Changes as Legal Problems Mount

150. This year, Defendant has announced additional changes to gameplay and communications policies purportedly aimed at child safety.

151. In July 2025, Defendant announced the rollout of an optional feature called Trusted Connections for teenage users that permits unfiltered voice and text chats.[143] Only users whose age is verified via a video selfie are eligible to be a Trusted Connection, and a user between the ages of 13 and 17 may only add a user over 18 as a Trusted Connection via an in-person QR code scan or phone number.[144] Users determined by Defendant's AI system's review of the optional video selfie to be under 13 will lose access to features Defendant deems not to be age appropriate.[145]

152. That month, Defendant also enabled users to turn off a setting that shows other users that they are on Roblox and to set a "do not disturb" status to prevent push notifications from Roblox during specific time windows, which may make the platform less addictive.[146]

153. In August 2025, Defendant advised that it was changing its policies to prohibit material that "implies" sexual activity and restricting minor users' access to so-called

---

[143] Megan Farokhmanesh, *Roblox's New Age Verification Feature Uses AI to Scan Teens' Video Selfies,* WIRED (Jul. 17, 2025) https://www.wired.com/story/robloxs-new-age-verification-feature-uses-ai-to-scan-teens-video-selfies/.
[144] *Id.*
[145] *Id.*
[146] Anna Halkidis, *Roblox Introduces 4 New Safety Features to Better Protect Teens*, PARENTS (Jul. 17, 2025), https://www.parents.com/roblox-safety-features-for-teens-11773713.

"experiences" within the platform that depict private spaces (such as bedrooms) or are intended for adults (such as bars).[147]

154. The following month, Defendant restricted all users' access to experiences that were "unrated," meaning they lacked a maturity label.[148] Previously, anyone who listed a birthdate that would put their age at over 13 years old could access such experiences.[149]

155. But Defendant continues to assign maturity labels to experiences by using a questionnaire filled out by the experience's creator without any verification of the content of the experience.[150]

156. Simply because an experience is labeled for an intended audience means nothing without proactive confirmation as to the accuracy of that label, as the numerous apparently innocent experiences containing harmful content demonstrate.[151]

C. Roblox's Recent Changes Are Utterly Insufficient and Children Are Still Being Harmed

157. Even with recent policy updates, Defendant does not have sufficient safety features in place to prevent children from creating their own accounts and playing on Roblox without parental oversight. Indeed, Defendant does nothing to confirm or document that parental

---

[147] Andy Chalk, *Roblox Changes Policies on 'Romantic and Sexual Content' and Promises Better Moderation on the Way As Louisiana AG Repeats Assertion That the Platform 'Is a Breeding Ground for Sex Predators'*, PC GAMER (Aug. 18, 2025), https://www.pcgamer.com/games/roblox-changes-policies-on-romantic-and-sexual-content-and-promises-better-moderation-on-the-way-as-louisiana-ag-repeats-assertion-that-the-platform-is-a-breeding-ground-for-sex-predators/.
[148] Dominik Bošnjak, *Roblox Shuts Down Gray-Area Games Over Child Safety Concerns*, GAMERANT (Sep. 30, 2025), https://gamerant.com/roblox-unrated-experiences-games-disabled-child-safety-efforts/.
[149] Tom Bowen, *How to Access Unrated Experiences in Roblox*, GAMERANT (May 18, 2025), https://gamerant.com/roblox-unrated-experience-join-fix/.
[150] Bošnjak, *supra* note 149.
[151] *See, e.g.,* r/roblox, REDDIT (Aug. 2025), https://www.reddit.com/r/roblox/comments/1ms21ku/they_already_put_it_back_this_is_disgusting/ (last visited Nov. 4, 2025) (describing "Dollhouse Roleplay" experience known to be used by sexual exploitation ring 764 to groom minors).

permission has been given, no matter how young a child is. Nor does Defendant require a parent to confirm the age given when a child signs up to use Roblox.

158. Defendant now has access to biometric age verification software that requires the user to take a photo of a government-issued ID along with a real time selfie photo that is then verified through AI. However, while Defendant utilizes this software for other purposes, Defendant intentionally does not utilize this feature when new accounts are created. As such, Defendant also still relies on self-reported birthdays for age verification, and Roblox is intentionally and/or recklessly designed to allow users to create accounts using fake birthdays, allowing adults to pose as children and allowing children to easily circumvent the more restrictive controls for account users under the age of 13.

159. Now, under Roblox's default settings, adults cannot directly message children under 13, outside of "experiences." However, messaging can still be done from within the "experiences," as well as voice chatting—meaning the new policies do not effectively regulate or prevent adult-child interactions. Further children under 13 can still receive friend requests from within the "experiences." As such, despite these recent changes, Roblox continues to make children highly vulnerable to predators.

Age Restrictions Options and Experience Example

160. Despite these failures, Defendant continues to falsely and aggressively market itself as an "industry leader" when it comes to child safety.[152] Central to this self-serving narrative is its "accomplishments" of investing in AI and machine learning systems supposedly designed to scan and monitor all communications on the app and prevent the sharing of inappropriate content and personally identifiable information.[153]

161. Yet this technology has proven grossly inadequate and insufficient to protect children. For example, Defendant's filters have inexplicable omissions. While Defendant blocks certain words, like "Snap" and "Snapchat," to supposedly prevent off-app communications, it allows workarounds such as the use of the ghost emoji, which is widely recognized as a symbol for Snapchat, or alternative spellings, like "Snappy" or "apchat." Similarly, while the word

[152] Roblox Corp., Q1 2021 Earnings Conference Call (May 11 2021).
[153] *Safety Features: Chat, Privacy & Filtering,* ROBLOX, https://web.archive.org/web/20240714130904/https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering (archived Jul. 14, 2024).

"Discord" is blocked, users can bypass this filter by using the disc emoji or typing variations, like "iscord" or "cord."[154]

162. That Defendant selectively blocks the words "Snap," "Snapchat," and "Discord" reveals that Defendant is fully aware of the dangers of off-product, inappropriate communications yet chooses not to close these loopholes. And while Defendant prevents users from sharing phone numbers in numerical format, it does nothing to stop users from spelling out the numbers.[155]

163. Roblox developer forums are awash in concerns voiced by the very game developers Defendant 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 Defendant), messages can easily slip by the filters.[156] Other developers note that by using "letter emojis" (again, provided by Roblox) instead of letters, content can sail easily through Roblox's filters.[157] These developers describe this as "a serious problem" and many seem to wonder why Defendant has failed to fix these issues.

164. Roblox's approach to chat contrasts sharply with other gaming services like Nintendo, which use preprogrammed dialogue options to tightly control user interactions.[158] By adopting a similar approach, Defendants could have significantly reduced—if not eliminated—the grooming and child abuse facilitated by Roblox because predators would not have been able to solicit any personal information or send any coercive or sexually suggestive messages.

---

[154] Edwin Dorsey, *Problems at Roblox (RBLX) #5,* THE BEAR CAVE (Oct. 17, 2024), https://thebearcave.substack.com/p/problems-at-roblox-rblx-5.
[155] *Id.*
[156] *Uh, Roblox? Theres a Way to 100% PERFECTLY Bypass the Chat Filter. Something Needs to be Done*, DEVFORUM, https://devforum.roblox.com/t/uh-roblox-theres-a-way-to-100-perfectly-bypass-the-chat-filter-something-needs-to-be-done/3370284/5 (last visited Nov. 4, 2025).
[157] *Chatfilter Bypass Method*, DEVFORUM, https://devforum.roblox.com/t/chatfilter-bypass-method/3094582 (last updated Aug. 19, 2024) (last visited Nov. 4, 2025).
[158] Carville & D'Anastasio, *supra* note 41.

165. Further, these changes are little more than window dressing—too little, too late, and woefully inadequate. Most fundamentally, Defendant *still allows* adults to contact and message children. Defendant 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 the child predators' blueprint for finding children on Roblox intact since predators have always found children by playing games they know that children will frequent.[159] Defendant also failed to address core issues like Roblox's lack of age verification and refusal to require parental consent to make an account. Defendant did not commit to hiring more content moderators, nor did it implement any sort of identity check to prevent registered sex offenders from making accounts.

166. In fact, recently, in April 2025, a research firm in the U.K. demonstrated just how easy it still is for predators to find and groom children and move the conversation to another platform, such as Snapchat or Discord.[160] Because Roblox still allows adult users to message children in games, predators can use the public chat functions in games to groom child users and ask for their usernames on other platforms. And, for chat within games, Defendant Roblox's default settings for children under the age of 13 is to allow "everyone" to chat with these children, thereby facilitating predators' access to children.[161] The key findings from this report included that "[a]dults and children can chat with no obvious supervision" and that "[t]he safety controls that

---

[159] 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 (March 17, 2025), https://www.youtube.com/watch?v=LQztK0MCUAc.

[160] *A Digital Playground: The Real Guide to Roblox*, REVEALING REALITY (Apr. 13, 2025), https://think.revealingreality.co.uk/roblox-real-guide.

[161] *Parental Controls Overview*, ROBLOX, https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview (last accessed October 10, 2025).

exist are limited in their effectiveness and there are still significant risks for children on the platform."[162]

167. 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.[163] Because Defendant knew that users often turned to other apps like Discord or Snapchat to communicate while playing games and because Defendant knew that its safety changes would reduce key user engagement metrics, it sought to capture that traffic (and revenue) and replace any loss of engagement with the 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 its bottom line.[164]

168. Beyond Defendant's deliberately ineffective technology, the company also employs a woefully inadequate number of human moderators to analyze and manage content on its platform. Roblox has only about 3,000 employees across all business categories. By contrast, TikTok, for all its problems, despite having only three times the number of users, has a team of 40,000 dedicated content moderators.[165]

---

[162] REVEALING REALITY, *supra* note 160.
[163] Rebecca Ruiz, *Roblox's New Party Feature Makes Discord Obsolete,* MASHABLE (Dec. 2, 2024), https://mashable.com/article/roblox-party-discord.
[164] *Id.*
[165] Carville & D'Anastasio, *supra* note 41.

169. 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."[166] 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.[167]

CAUSES OF ACTION

Count I
Violation of the Texas Deceptive Trade Practices ("DTPA")
Tex. Bus. & Com. Code Ann. §§ 17.41 et seq.

170. Plaintiff realleges and incorporates by reference every allegation set forth above as though fully alleged herein.

171. The Texas DTPA prohibits false, misleading, or deceptive acts or practices in the conduct of any trade or commerce. Tex. Bus. & Com. Code § 17.46(a). This includes, but is not limited to, representing that services have characteristics, uses, benefits, or quantities which they do not have § 17.46(b)(5); representing that goods or services are of a particular standard or quality if they are of another § 17.46(b)(7); or failing to disclose information concerning goods or services which was known at the time of the transaction if such failure to disclose such information was intended to induce the consumer into a transaction into which the consumer would not have entered had the information been disclosed § 17.46(b)(24).

172. Defendant is a "person" as defined in § 17.45(3), which includes corporations.

---

[166] 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.wbm.org/hereandnow/2024/l1/18/roblox-safetyfeatures.
[167] Carville & D' Anastasio, *supra* note 41.

173. Defendant engaged in "trade or commerce" as defined in § 17.45 (6) through the sale of services and commerce directly or indirectly affecting Texas.

174. Roblox has, in the course of trade and commerce, engaged in false, misleading, and deceptive acts and practices in their representations and advertisements regarding Roblox's design, safeguards, and safety monitoring. §§ 17.46(b)(5), (b)(7), (b)(9). Specifically, Roblox engaged in this conduct by, among other false, misleading, and deceptive statements detailed above, the following:

(a) Representing and falsely assuring the public that services were safe for children, and thereby representing its services as having characteristics, uses, and benefits that it does not have;

(b) Representing that its services are safe for children and that reasonable guardrails and safety measures existed when, in actuality, its services pose serious harm and lack sufficient measures to protect children;

(c) Advertising its services as safe for children while failing to implement appropriate safeguards to protect children and ensure their gaming platform is safe as advertised;

(d) Falsely, misleadingly, and deceptively representing that it has taken "every precaution possible" to protect children;

(e) Falsely, misleadingly, and deceptively representing that Roblox is "a safe, moderated place";

(f) Falsely, misleadingly, and deceptively representing that safety is Roblox's number one priority;

(g) Falsely, misleadingly, and deceptively representing that Roblox engages in fulsome content review and employs a team of "thousands" of content moderators;

(h) Falsely, misleadingly, and deceptively representing that Roblox has a zero-tolerance policy for obscenities and inappropriate content, and "immediately suspended or permanently expelled" offenders;

(i) Falsely, misleadingly, and deceptively representing that "Everything" on Roblox "is reviewed by … real life humans"

(j) Falsely, misleadingly, and deceptively representing that Roblox reviews every uploaded image, audio, and video file with a large team of human moderators and machine detection before they are made available to users;

(k) Falsely, misleadingly, and deceptively claiming a "12+" and "T" for "Teen" rating on the Apple, Google Play, and Microsoft app stores through false and misleading representations regarding the volume of inappropriate content available on Roblox; and

(l) Falsely misleadingly, and deceptively claiming that bad actors are "dealt with swiftly" on Roblox and that Defendant "remove[s] any content that's reported to us within minutes."

175. Roblox has also, in the course of trade and commerce engaged in false, misleading, and deceptive acts and practices in Roblox's failure to disclose the material limitations and dangers of its platform to children, i.e., the high volume of sexual content and high risk of sexual predators on its platform, which was known to Roblox as it continued to transact with Texas consumers. As

a result, without proper warning or notice to parents, Texas consumers were induced into a transaction they would not have entered had the information been disclosed. § 17.46 (b)(24).

Count II
Common Nuisance
Tex. Civ. Prac. & Rem. Code §§ 125.001 et seq.

176. Plaintiff realleges and incorporates by reference each and every allegation set forth above as though fully alleged herein.

177. A common nuisance is a place where people habitually go for certain illegal activities, and the person responsible for maintaining the place knowingly tolerates the activities and fails to make reasonable attempts to abate such activities. *See* Tex. Civ. Prac. & Rem. Code § 125.0015. These activities include, among other things, continuous sexual abuse of young children and sexual conduct or performance by a child. § 125.0015 (a)(17), (a)(21). A person operating a web address or computer network in connection with these activities maintains a common nuisance. § 125.0015 (c).

178. Defendant is a corporation and thus qualifies as a "person" under common nuisance statutes.

179. As discussed above, Defendant operates an interactive gaming platform that has become a habitual destination for child predators engaging in grooming and child sexual exploitation.

180. Numerous reports and investigations have documented how predators use Roblox's anonymity, chat features, and in-game currency to identify, groom, and exploit children, often escalating abuse through other platforms.

181. Despite years of awareness, Roblox has failed to implement adequate safeguards or abate these activities. The platform has facilitated the distribution of child sexual abuse material, including through organized networks and direct exchanges involving Robux.

182. Roblox knowingly tolerates and enables illegal conduct described in § 125.0015, thereby maintaining a common nuisance under Texas law.

183. The Texas Attorney General may bring an action on behalf of the state to either declare a common nuisance and/or abate the public nuisance. §§ 125.002; 125.0025.

184. Under § 125.0025, in declaring that a web address or computer network is a common nuisance, the sole remedy available is a judicial finding issued to the Attorney General. Under §§ 125.002, in an abatement action, the Attorney General may request injunctive relief. In all circumstances the Attorney General may seek attorney's fees and costs pursuant to § 125.005.

185. Because Defendant's platform is a common nuisance, Plaintiff seeks: (a) judicial finding that Roblox is a public nuisance; (b) abatement by injunctive relief; (c) attorney's fees and costs; and (d) any other equitable remedies the Court deems appropriate under §§ 125.001 et seq.

CIVIL PENALTIES

186. Texas incorporates the foregoing allegations as if set forth fully herein.

187. Texas is not required to allege injuries to bring claims seeking civil penalties under the DTPA. Tex. Bus. & Com. Code § 17.47(a) (creating a cause of action "[w]henever the consumer protection division has reason to believe that any person is engaging in, has engaged in, or is about to engage in any act or practice declared to be unlawful by [the DTPA] …"); *see e.g. Holzman v. State*, No. 13-11-00168-CV, 2013 WL 398935, at *3 (Tex. App.—Corpus Christi2013, pet. denied) ("Moreover, it is not necessary for the State to allege any injury to a [consumer] to recover the civil

penalties it seeks in its live petition."); *see also Texas v. Colony Ridge, Inc.*, Civil Case No. CV-H-24-0941, 2024 WL 4553111, at *8 (S.D. Tex. 2024) (same).

188. Texas is entitled to recover up to $10,000 for each violation of the DTPA. *See* Tex. Bus. & Com. Code § 17.47(c)(1).

189. Texas Bus. & Com. Code § 17.47(g) (emphasis added) provides that "In determining the amount of penalty imposed … the trier of fact *shall consider*:

> (1) the seriousness of the violation, including the nature, circumstances, extent, and gravity of any prohibited act or practice;
>
> (2) the history of previous violations;
>
> (3) the amount necessary to deter future violations;
>
> (4) the economic effect on the person against whom the penalty is to be assessed;
>
> (5) knowledge of the illegality of the act or practice; and
>
> (6) any other matter that justice may require.

190. Plaintiff requests injunctive relief, civil penalties, and any other equitable remedies the Court deems appropriate under the DTPA and state equity principles.

DEMAND FOR JURY TRIAL

191. The State demands a jury trial and tenders the appropriate fee with this petition.

PRAYER FOR RELIEF

192. The State of Texas respectfully requests that this Honorable Court issue an order:

a. Imposing civil penalties on Defendant of up to $10,000 for each violation of the DTPA;

b. Declaring Defendant's conduct as described herein to be in violation of the DTPA;

c. Permanently enjoining Defendant, their agents, employees, and all other persons acting on their behalf, directly or indirectly: from engaging in the above

acts, practices, and conduct in trade or any other practice in violation of the DTPA;

d. Awarding Texas's attorney's fees and costs pursuant to Tex. Gov't Code § 402.006(c);

e. Judicially finding that Defendant is a public nuisance, enjoining Defendant from further violations as public nuisance, attorney's fees and costs pursuant to Texas Civil Practice & Remedies Code §§ 125.001 et seq.; and,

f. Granting any other general, equitable, or further relief that this Court deems just and proper.

November 6, 2025:

Respectfully submitted,

/s/ Johnathan Stone
JOHNATHAN STONE
Chief, Consumer Protection Division
Texas State Bar No. 24071779

JERRY BERGMAN
Deputy Chief, Consumer Protection Division
Texas State Bar No. 24081694
Consumer Protection Division
Office of the Texas Attorney General
P.O. Box 12548
Austin, Texas 78711
Telephone: (512) 463-2185
Fax: (512) 473-8301
Johnathan.Stone@oag.texas.gov
Jerry.Bergman@oag.texas.gov

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
Deputy First Assistant Attorney General

AUSTIN KINGHORN
Deputy Attorney General for Civil Litigation

RYAN WALTERS
Deputy Attorney General for Legal Strategy

Brandon J. Smith*
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIAK PLLC
1221 Broadway, Ste. 2100
Nashville, TN 37203

Mark I. Pinkert*
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIAK PLLC
119 S. Monroe St., Ste. 500
Tallahassee, FL 32301

Kellen Dwyer*
David Johnson*
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIAK PLLC
2300 N Street NW, Ste. 643
Washington, DC 20037

Jonathan Lienhard*
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIAK PLLC
15405 John Marshall Hwy
Haymarket, VA 20169

**Pro Hac Vice Forthcoming*