

IN THE DISTRICT COURT OF  
ADAMS COUNTY, NEBRASKA

STATE OF NEBRASKA, *ex rel.*  
MICHAEL  
T. HILGERS, ATTORNEY GENERAL,

*Plaintiffs,*

v.

ROBLOX CORPORATION

*Defendant.*

Case No. \_\_\_\_\_

**JURY TRIAL  
DEMANDED**

**COMPLAINT**

1. This is an action brought by the State of Nebraska, through its Attorney General Michael T. Hilgers, to hold Defendant Roblox Corporation accountable for misleading Nebraska parents and children about the dangers of its platform and the steps it was taking to address those dangers.

2. For years, Roblox has known that it has a pedophile problem. It built an extremely popular interactive gaming and social media platform by doing what other social media companies would not: marketing to and accepting pre-teenage users. As a result, Roblox became, in its own words, the “#1 gaming site for kids and teens.”<sup>1</sup>

3. Despite profiting from running a “virtual playground” for millions of vulnerable children, Roblox refused to take basic precautions needed to make that “virtual playground” safe. As a result, sexual predators have repeatedly used Roblox to groom and eventually abduct and sexually assault children.

4. In response, rather than fixing the problem, Roblox launched a multiyear charm offensive designed to mislead Nebraska children and their parents into believing that Roblox is a “safe, moderated” place. This included, but was not limited to, falsely claiming that Roblox takes “every precaution possible” to protect children, and

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<sup>1</sup> Roblox, *What Is Roblox*, <http://web.archive.org/web/20170227121323/https://www.roblox.com/> (archived Feb. 27, 2017).

misrepresenting the size, training, employment status, policies, procedures, and success metrics of its content moderation division.

5. Roblox is one of the most popular interactive online gaming platforms in the United States. It has *over 151 million daily active users*, many of whom reside in Nebraska and most of whom are under the age of 18.<sup>2</sup> Reportedly, as many as two-thirds of U.S. children ages 9 to 12 have Roblox accounts.<sup>3</sup>

6. Defendant repeatedly assures the public that Roblox is safe for children and that the company has taken “every reasonable precaution” to protect them. 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 and pornography on its platform for years, Defendant failed to take reasonable precautions, and it even expanded efforts to attract more adults onto its platform for profit.

7. As Defendant has been long 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 under 13 to adults—can easily sign up and then navigate the universe in avatars, which provide absolute anonymity. Users wander around in this unregulated universe, where children can chat with other children but also adults who are disguised by avatars and can misrepresent their age and intentions.

8. 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 Nebraska 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 fictional underage sexual activity takes place. There are even hundreds of experiences just about Sean Puffy Combs, who was recently convicted of trafficking and prostitution. These are just a few of the thousands of examples, some of which are discussed below.

9. 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

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<sup>2</sup> Metrics for brands & developers on Roblox, <https://brands.roblox.com/metrics-insights>

<sup>3</sup> 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>.

terrifying. Dozens of FBI investigations, criminal convictions, and private lawsuits detail the ways in which Roblox has facilitated real child abuse and pornography. Nebraska State Patrol’s Internet Crimes Against Children Task Force Lieutenant Monty Lovelace has stated that Nebraska has seen such reports of inappropriate behavior on Roblox.<sup>4</sup>

10. 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 chats and lure the child with promises of an in-game currency called “Robux.” Kids often say they will do “anything for Robux.” 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. Sometimes the predators use Roblox to meet children and then divert them to other messaging apps where they can more easily communicate and meet in secret.

11. 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.

12. Despite knowing about these serious problems for years, Defendant failed to implement reasonable guardrails and, worse, falsely and deceptively advertised its platform as safe for children, making dozens of material misrepresentations of fact. As a result, Roblox caused Nebraska’s children to be exposed to sexual predators, sexual content, and even sexual assault.

13. Only within the last year—and 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. In the last few weeks, more children have been abducted and abused by Roblox predators. Defendant’s deliberate failure to implement effective safety measures to protect child users from well-documented predatory threats, combined with its misleading statements to the contrary and ongoing failure to warn parents and children of known dangers on its platform, has caused the widespread sexual exploitation of minors and inflicted severe, lasting harm upon the children of Nebraska.

14. The Attorney General of Nebraska, 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 seek restitution and/or disgorgement of

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<sup>4</sup> <https://www.3newsnow.com/central-omaha/omaha-kidnapping-raises-concerns-about-online-safety-experts-give-tips>

Defendant's illicit gains, the imposition of civil penalties, recovery of attorneys' fees and costs, injunctive relief, actual damages, and all other remedies, orders, and judgments authorized under Nebraska law.

## **PARTIES**

15. Plaintiff State of Nebraska, *ex rel.* Michael T. Hilgers, Attorney General, is a sovereign State of the United States of America.

16. Nebraska sues in its capacity as *parens patriae* to protect the health, safety, and welfare of its residents—particularly Nebraska's children—and to vindicate the State's strong interest in ensuring a safe and honest marketplace for online services, especially those marketed to minors. The Attorney General is authorized to enforce Nebraska's consumer protection statutes, including the Nebraska Consumer Protection Act, Neb. Rev. Stat. §§ 59-1601 *et seq.*, and the Uniform Deceptive Trade Practices Act, Neb. Rev. Stat. §§ 87-301 *et seq.* Acting under this statutory and common-law authority, including the power to enforce the law as *parens patriae*, the Attorney General brings this action to vindicate consumers harmed by Roblox's misrepresentations and deceptive practices and to prevent the ongoing deception and exploitation of Nebraska's children and families.

17. Defendant Roblox Corporation is a Nevada 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, and profits from the data obtained from its users and the sale of virtual currency needed for premium services on its platform. Defendant provides Roblox to all fifty states, including the State of Nebraska. Defendant has ratified every act or omission alleged herein, proximately causing the injuries and damages claimed.

## **JURISDICTION AND VENUE**

18. Personal jurisdiction is proper under Nebraska's long-arm statute, Neb. Rev. Stat. § 25-536. Specifically, this Court has personal jurisdiction over Defendant because Roblox purposefully directs its activities toward Nebraska residents by operating and providing access to its online platform in Nebraska; advertising and marketing to parents and children it knew were located in Nebraska; offering and selling online currency called "Robux," subscriptions, other services, and physical game-related toys to Nebraska consumers; selling, and causing to be sold, physical gift cards for Robux in Nebraska; collecting payments from Nebraska users; knowingly acquiring, using, and disclosing children's personal information from devices located in Nebraska; and

otherwise entering into ongoing electronic transactions with Nebraska 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 related to the above-mentioned goods and services that have injured Nebraska children and families.

19. Defendant has also engaged in continuous and systematic business contacts with Nebraska, including by distributing and furnishing its platform statewide; maintaining user accounts for Nebraska residents; processing purchases of Robux, gift cards, and other products, made from Nebraska; and communicating with Nebraska users and parents regarding the platform's features, safety settings, and policies. Defendant intended its platform and products to be used in Nebraska.

20. Through this advertising, marketing, distribution, and sale of its online services, virtual currency, and physical merchandise such as gift cards and toys to Nebraska residents—including minors—Defendant has purposefully availed itself of the benefits and protections of Nebraska law and created substantial connections with Nebraska. These contacts are not random, fortuitous, or attenuated.

21. Defendant also purposefully conducts business in Nebraska by marketing (1) virtual Roblox goods, and (2) Roblox toys and other physical merchandise such as Robux gift cards to children in Nebraska. This affirmative conduct occurred—and continues to occur—both through online retailers (including the Roblox platform itself) and through brick-and-mortar retailers which are physically located in Nebraska, and which sell Roblox merchandise.

22. According to Defendant's website, physical Roblox gift cards are carried at retailers in Nebraska such as Walmart, Target, Walgreens, CVS, Best Buy, Dollar General, Family Dollar, GameStop.<sup>5</sup>

23. Physical gift cards and toys that Roblox sells at brick-and-mortar locations in Nebraska are meant to lure new minor users onto the platform itself and stimulate demand for existing users.

24. Venue is proper in Adams County under Neb. Rev. Stat. § 25-403.01. Specifically, venue is proper because the cause of action arose, in substantial part, in this County and throughout Nebraska. Defendant's conduct—including offering Roblox and Robux and physical gift cards to Nebraska residents, marketing to Nebraska families, and causing injury to Nebraska minors and families—constitutes transactions and events occurring in this State, including within Adams County. Furthermore, Defendant has users in Adams County, and at least one alleged Nebraska victim resides in Adams County and has sued in federal court, claiming he was groomed and assaulted after

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<sup>5</sup> *Roblox | Gift Cards*, Roblox, <https://www.roblox.com/giftcards-retailers-us?location=us> (last visited Oct. 10, 2025).

interactions on Roblox, tying key events to this County.<sup>6</sup> In the alternative, because Defendant is a nonresident corporation, venue is proper in any Nebraska county under § 25-403.01.

## FACTUAL ALLEGATIONS

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

#### A. Roblox Is an Interactive Platform with Third-Party Developer “Experiences”

25. 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.

26. Third-party game developers can easily upload their content to the platform. Given the ease of putting up new content, there are more than 6.4 million experiences within the Roblox ecosystem.<sup>7</sup> 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, deciding whether to require age verification or age restrictions for each experience, what policies and rules to implement regarding inappropriate conduct, and whether and how to monitor for inappropriate conduct, and how to handle and facilitate complaints by users.

27. Roblox is designed to be a uniquely interactive online platform, allowing and encouraging users to communicate and interact 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.

28. 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.”<sup>8</sup> Defendant has similarly explained that it “operates a human co-experience

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<sup>6</sup> Kiefer Zabel, *Central Nebraska man sues Roblox, alleging predator groomed him on game*, KSNB (Oct. 28, 2025), <https://www.ksnblocal4.com/2025/10/28/nebraska-man-sues-roblox-alleging-predator-groomed-him-game/>.

<sup>7</sup> ROBLOX, <https://corp.roblox.com/> (last visited Oct. 9, 2025).

<sup>8</sup> David Baszucki, *The CEO of Roblox on Scaling Community-Sourced Innovation*, HAR. BUS. REV., (Mar.–Apr. 2022), <https://perma.cc/G5AA-9GCQ>.

platform . . . where users interact with each other to explore and develop immersive, user generated, 3D experiences.”<sup>9</sup>

29. 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*

30. 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.

31. Access to Roblox is not “free,” in that users pay with their data, time, and attention, which Roblox monetizes. To access Roblox’s website, the user must agree to Roblox’s Terms of Use, which is a contractual agreement that allows Roblox to collect and distribute user data, and which binds users to Roblox’s privacy policies.<sup>10</sup>

32. Defendant also generates revenue by selling users a platform-exclusive currency called “Robux,” which must be purchased using real-world currency before exchanging “Robux” for digital content and premium services and access 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, sold in brick-and-mortar stores like CVS, that anyone can purchase and send to any user. Those Robux can then be used for in-game (or in-“experience”) purchases.

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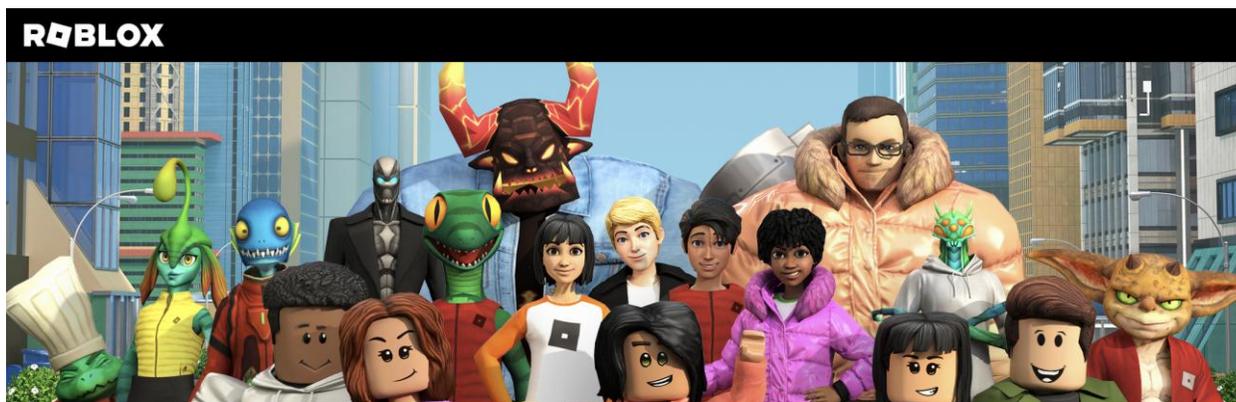
<sup>9</sup> Roblox Corp., Quarterly Report (Form 10-Q) at 15 (May 13, 2021).

<sup>10</sup> <https://www.roblox.com/>

33. In addition, Roblox, like many other social media websites and online platforms, generates revenue by monetizing users’ time, attention, and data, primarily through targeted advertisements. According to its 2025 Form 10-K, filed with the Securities and Exchange Commission, Roblox “collect[s] and store[s] personal data and certain other sensitive, confidential, and proprietary information in the operation of [its] business, including creator, user and employee information.”<sup>11</sup> With respect to users, Roblox “tracks user account and session activity,” including “hours engaged,” which “reflects the increasing value of our Platform.”<sup>12</sup> Roblox then monetizes that data by providing it to content developers and advertisers.<sup>13</sup>

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

34. Defendant designed Roblox for and intentionally markets to 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.

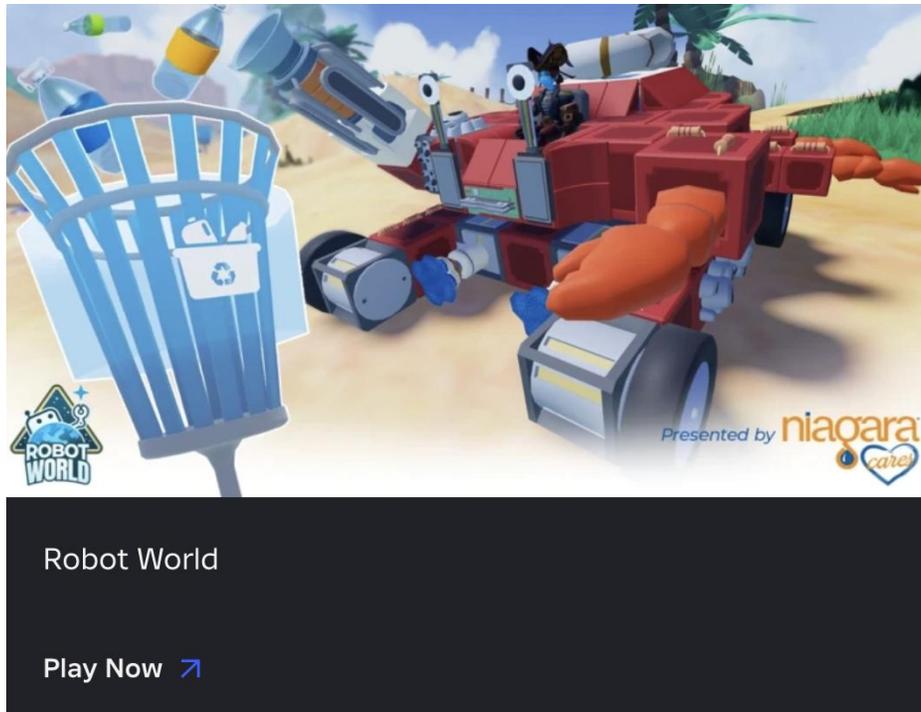


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<sup>11</sup> Roblox Corporation, Form 10-K for the fiscal year ended Dec. 31, 2025 (Feb. 11, 2026), 36, <https://www.sec.gov/ix?doc=/Archives/edgar/data/0001315098/000131509826000024/rblx-20251231.htm>.

<sup>12</sup> *Id.* at 5, 68.

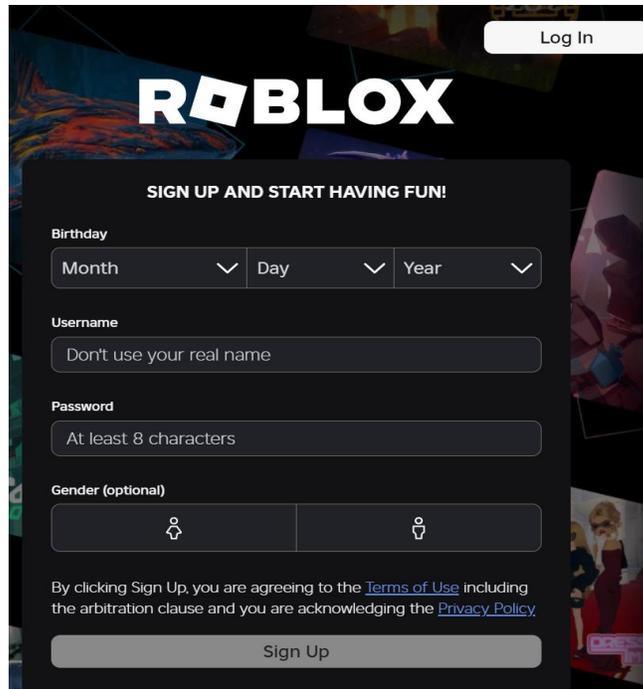
<sup>13</sup> <https://ir.roblox.com/financials/sec-filings/default.aspx>; <https://ir.roblox.com/news/news-details/2026/Roblox-Reports-Fourth-Quarter-and-Full-Year-2025-Financial-Results/default.aspx>



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

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

36. Individuals who wish to play Roblox must first create an account. It is a seamless process to “SIGN UP AND START HAVING FUN!” Users need only 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. Nor does Defendant 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*

37. Children 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.

38. Even with 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.

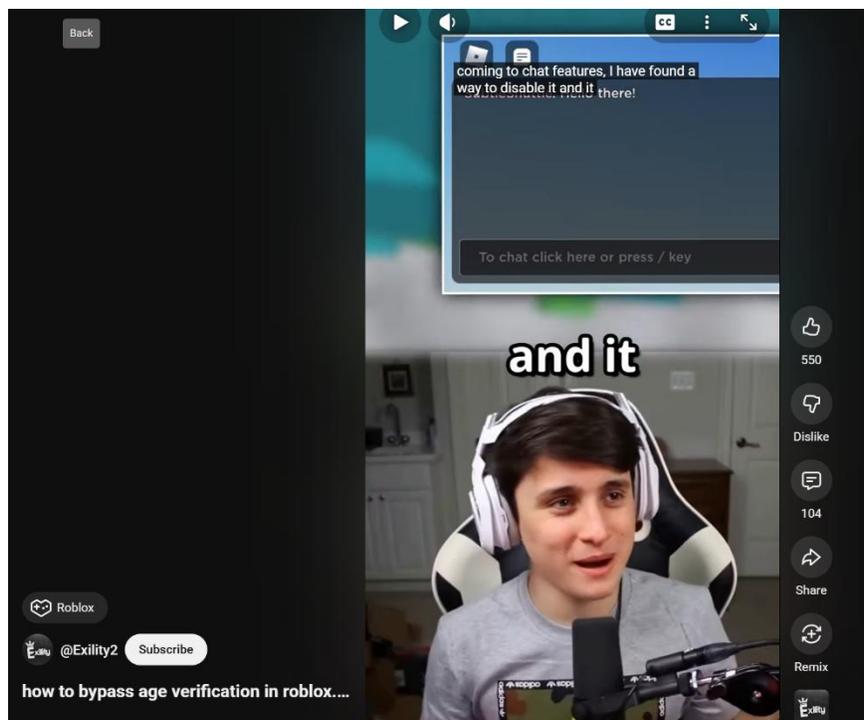
39. To make matters worse, in December of 2025, Roblox’s belated and heavily marketed “Safety” initiative, an artificial intelligence-powered age verification system, collapsed into a glaring and dangerous failure. Rather than meaningfully protecting children, the system has repeatedly misclassified users’ ages, placing adults in child chat groups and minors in adult categories, while age-verified accounts for young children have already been traded on third-party marketplaces, undermining any purported safety benefits.<sup>14</sup> These failures not only contradict Roblox’s claims that the

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<sup>14</sup> David Gilbert, *Roblox’s AI-Powered Age Verification Is a Complete Mess*, WIRED (Jan. 13, 2026), <https://www.wired.com/story/roblox-ai-powered-age-verification-is-a-complete-mess/>.

technology would restrict adult access to children but have also actively created new avenues for exploitation.

40. Roblox’s purported safety system can be easily circumvented with simple, widely publicized tactics, undermining its claim that it can reliably distinguish minors from adults and protect younger users. Numerous methods for bypassing the age-verification process are readily available online, as seen below, demonstrating that the system lacks meaningful safeguards against misrepresentation.



*Sample video of instructions on how to bypass age verification.*<sup>15</sup>

41. This matters because 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.”<sup>16</sup>

<sup>15</sup> @Exility2, *How to bypass age verification in Roblox* (YouTube Shorts video), YouTube (Jan. 5, 2026), <https://www.youtube.com/shorts/aCHBBdY2vWs>.

<sup>16</sup> *A New Era of Engaged Learning*, ROBLOX, <https://perma.cc/2G8Z-QA3H> (last visited Nov. 4, 2025).

These offerings, according to Defendant, include “high-quality, standards-aligned, immersive educational experiences designed by curriculum experts.”<sup>17</sup>



## Learners

Why learn on Roblox?

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

[LEARN MORE](#)

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

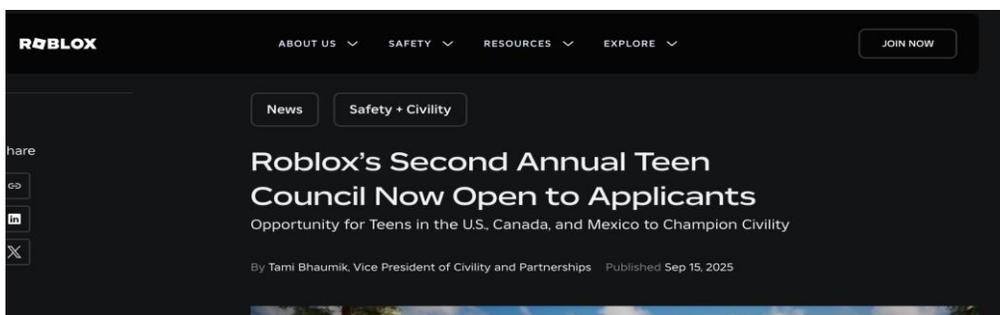
42. These statements further render parental controls ineffective, as parents will not intuitively understand their diligent supervision is necessary to protect their children on an educational gaming platform.

43. To this day, Roblox continues to market to children, because children are Roblox’s core user demographic. 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.”<sup>18</sup>

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<sup>17</sup> *Id.*

<sup>18</sup> Tami Bhaumik, *Roblox’s Second Annual Teen Council Now Open to Applicants*, ROBLOX (Sep. 15, 2025), <https://bit.ly/3N1328g>.



44. 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.<sup>19</sup>

45. Roblox also sells physical Roblox toys like action figures of characters in Roblox games via brick-and-mortar retailers in Nebraska.

### **C. Roblox Has Become Wildly Popular with Children and Adults.**

46. 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 world’s biggest recreational zone for kids.<sup>20</sup> Roblox has stated that its goal is to reach 1 billion daily active users.<sup>21</sup>

47. 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 old; 20% from 9–12 years old; 16% from 13–16 years old; and 44% at 17 years of age or over.<sup>22</sup>

48. 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.<sup>23</sup>

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<sup>19</sup> *Parents, Safety, and Moderation User Safety and Community Standards*, ROBLOX <https://bit.ly/3MLrR86> (last visited October 8, 2025).

<sup>20</sup> Roblox Corp., Registration Statement (Form S-1) at 3, 24 (Nov. 19, 2020).

<sup>21</sup> <https://finance.yahoo.com/news/roblox-ceo-delivers-imperial-announcement-204411860.html>

<sup>22</sup> *2025 Proxy Statement and 2024 Annual Report*, ROBLOX CORP. (May 29, 2025), <https://www.sec.gov/Archives/edgar/data/1315098/000155837025004965/rblx-20250331xars.pdf>.

<sup>23</sup> Shannon Liao, *Roblox, The Game Company Made Wildly Popular by Kids, Goes Public with \$41 Billion Valuation*, WASH. POST (Mar. 11, 2021), <https://bit.ly/4iY7JvJ>.

49. 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.

50. 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.<sup>24</sup>

## **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**

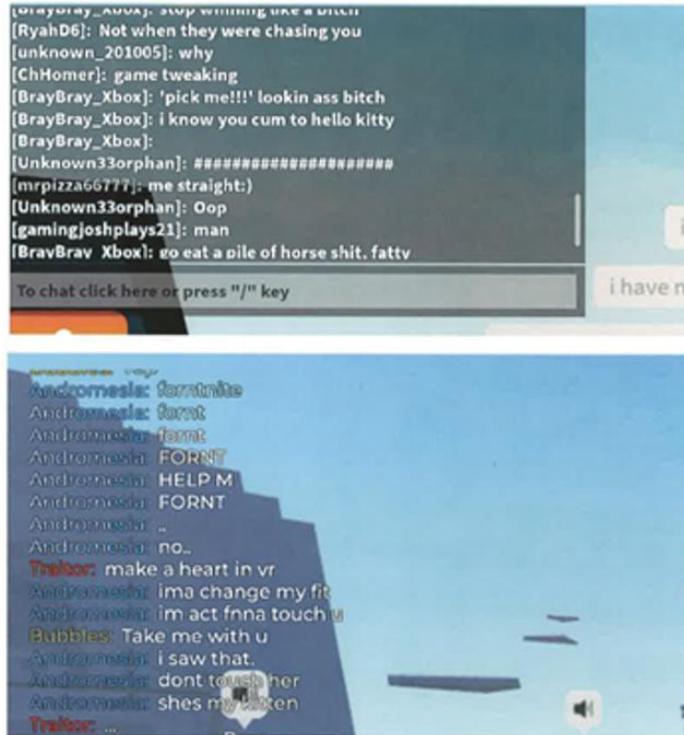
51. Based on a combination of several factors—easy access for minors, avatar anonymity, open and unregulated chat features, third-party content, and lack of guardrails—Roblox has created the perfect storm for child exploitation and child sexual abuse material.

52. At the outset, minor access to Roblox has been unregulated for most of the company’s history. Anyone who has access to the internet can sign up and create an account, without regard to age. Further, 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.

53. For years, Defendant’s default setting for Roblox allowed adults to easily communicate with children, without any guardrails. 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. Because of the avatar anonymity, the adult could lie and claim to be another child. 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.

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<sup>24</sup> *Roblox User and Growth Stats You Need to Know*, BACKLINKO (Aug. 12, 2025), <https://bit.ly/44qOyVo>.



*Examples of Roblox In-Gaming Chat*

54. 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 chose to allow the proliferation of inappropriate experiences on its platform in order to increase profits.

55. A third-party developer can self-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.

56. 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.<sup>25</sup> Thus, for years, there have been numerous reports of children’s avatars experiences simulated sexual

<sup>25</sup> See, e.g., RAVIORESINZ, *How to Do Roblox Sex Glitch*, (YouTube, Sep. 24, 2010) [https://www.youtube.com/watch?v=Zz97Q1SQE\\_k](https://www.youtube.com/watch?v=Zz97Q1SQE_k); see also TELAMONJOHN, *Roblox Sex?*, (YouTube, Jul. 17, 2011), <https://www.youtube.com/watch?v=hyqCHG6nUYI>.

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.<sup>26</sup> In describing the aftermath of this traumatic experience, the girl's mother explained, "I never in my wildest dreams would've ever imagined that I would have to talk with my seven-year-old about rape."<sup>27</sup>

57. 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 users record the pornographic videos they create on Roblox and publish them across the internet.

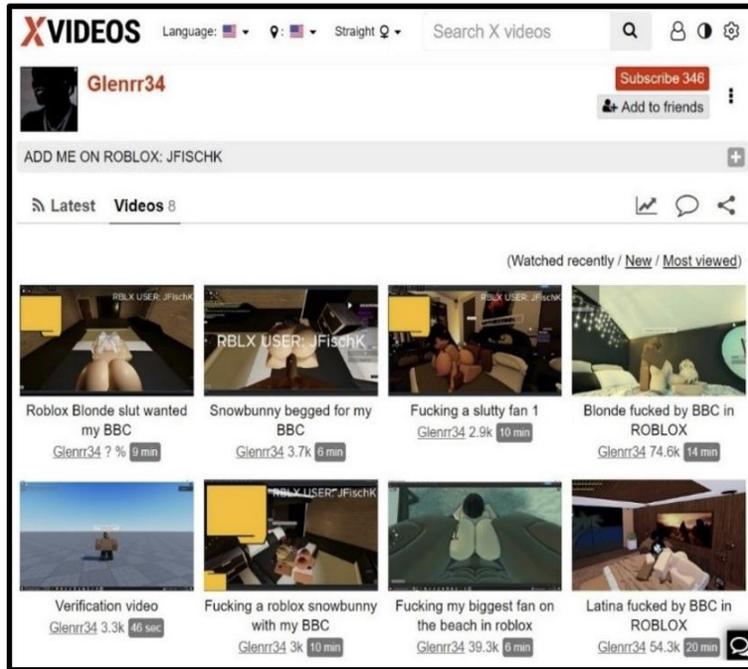
58. For example, on XVideos, a pornographic website, Roblox users post the pornographic videos they create on Roblox and seek out other Roblox users to simulate sexual acts with them on Roblox within seemingly innocuous games, like Brookhaven, which is one of Roblox's most popular experiences and is designated appropriate for users ages five and up.<sup>28</sup>

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<sup>26</sup> Savannah Levins, *North Carolina Mom Outraged After Roblox Game Depicts Violent Acts, Including Rape*, WCNC CHARLOTTE (Jun. 30, 2018), <https://bit.ly/4oPGIvz>.

<sup>27</sup> *Id.*

<sup>28</sup> *Brookhaven* 🏠RP, ROBLOX, <https://bit.ly/4oVp8X0> (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.<sup>29</sup>*

## **B. Third-Party Developers Upload “Experiences” Without Content Review, Leading to Influx of Inappropriate Content**

59. 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.

60. Defendant controls the way these tools are used and can place limitations and restrictions on them. Yet Defendant has provided grossly insufficient content review, leading to an influx of highly inappropriate content. As early as 2010, Roblox had begun hosting copious amounts of sexually explicit content.

61. 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

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<sup>29</sup> *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, HINDENBURG RSCH. (Oct. 8, 2024), <https://hindenburesearch.com/roblox/>.

clothing, reveal nudity, and engage in disturbing simulated sexual activities with other Roblox users.<sup>30</sup>

62. Roblox has allowed children to 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.<sup>31</sup> Roblox has also hosted virtual strip club “experiences” where avatars perform sexually explicit acts, like giving lap dances to patrons.<sup>32</sup>

63. 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:



*Screenshot from a Roblox Strip Club “Experience”*<sup>33</sup>

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<sup>30</sup> 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>

<sup>31</sup> HINDENBURG RSCH., *supra* note 23.

<sup>32</sup> Dickson, *supra* note 24.

<sup>33</sup> 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>.



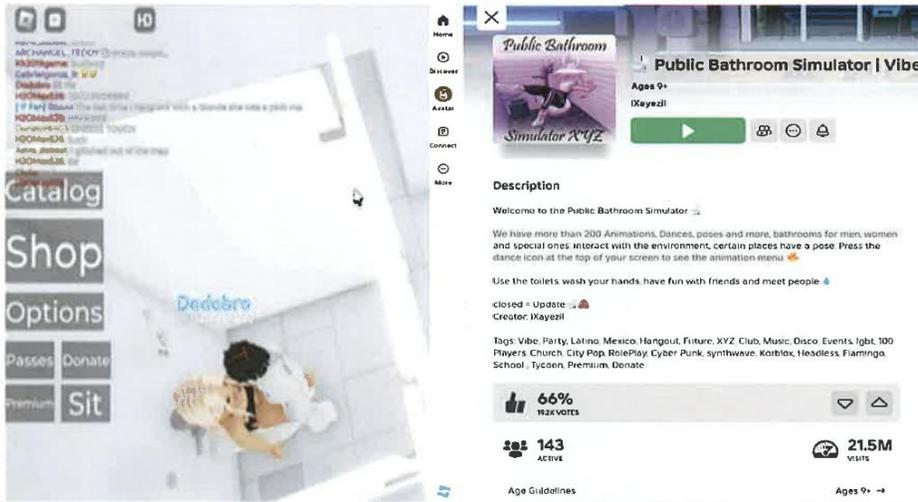
*Screenshots from “Experiences” with Nazi and KKK Material<sup>34</sup>*



*Screenshot from a Roblox Sex Simulation “Experience”<sup>35</sup>*

<sup>34</sup> 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>.

<sup>35</sup> *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/>.



*Roblox's Public Bathroom Simulator "Experience"*<sup>36</sup>



*Screenshot from a Roblox "Experience"*<sup>37</sup>

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

64. Beyond exposing children to harmful content, Roblox serves as the perfect access point to children for child predators and creates the ideal grooming environment.

<sup>36</sup> HINDENBURG RSCH., *supra* note 23.

<sup>37</sup> 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>.

According to reports from non-profits that focus on child exploitation, Roblox “is being used as a first point of contact for predators.”<sup>38</sup>

65. 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.



*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.*

66. 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.”<sup>39</sup> This conduct by predators is being done openly on Roblox.

<sup>38</sup> *The Dirty Dozen List '24: Roblox, A Mainstream Contributor to Sexual Exploitation*, NAT’L CTR. ON SEXUAL EXPLOITATION, <https://endsexualexploitation.org/roblox/> (last updated Dec. 4, 2024).

<sup>39</sup> Olivia Carville & Cecilia D’Anastasio, *Roblox’s Pedophile Problem*, BLOOMBERG BUSINESSWEEK (Jul. 23, 2024), <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/>.

67. 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.

68. 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.”<sup>40</sup>

69. Since children are typically limited in their ability to buy enough Robux, predators have taken advantage and coerced young users into trading Robux for sexually explicit images. Roblox understands this phenomenon, but rather than prevent it, takes a cut of the transaction.

70. 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. In one case, for example, a predator manipulated a child Roblox user and induced the child into sending pornographic images by sending the child gifts, including in the form of Robux.<sup>41</sup>

71. 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.<sup>42</sup>

72. As such, Roblox is deceptive and inadequately designed in many 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.

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<sup>40</sup> *Id.*

<sup>41</sup> <https://www.myfloridalegal.com/newsrelease/attorney-general-james-uthmeier-announces-arrest-extradition-snapchat-roblox-child>

<sup>42</sup> Attorney General James Uthmeier Announces Arrest, Extradition of Snapchat, Roblox Child Predator (Feb. 9, 2026), <https://www.myfloridalegal.com/newsrelease/attorney-general-james-uthmeier-announces-arrest-extradition-snapchat-roblox-child>

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

#### **A. During COVID-19, Roblox Welcomes Adults Despite Enhanced Risks to Child Users**

73. Despite recognizing the severe risks of exposing children to adults in an unregulated and unmonitored environment, and years of prioritizing children as the platform’s target audience, Defendant *welcomed* an influx of adults after the COVID-19 pandemic and around the time of its public offering.

74. 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 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.

75. 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.<sup>43</sup> 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.<sup>44</sup>

76. 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.<sup>45</sup>

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

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<sup>43</sup> Roblox Corp., S-1 (Securities Registration Statement) (Nov. 19, 2020).

<sup>44</sup> Roblox Corp., Q2 2022 Earnings Call (Aug. 10, 2022).

<sup>45</sup> *Goldman Sachs Communicopia*, ROBLOX (Sep. 21, 2021), <https://ir.roblox.com/events-and-presentations/events/event-details/2021/Goldman-Sachs-Communicopia/default.aspx>.

rolling out features designed to appeal to older users, including use of real names, screen capture and sharing capabilities, video calls, and relaxed chat moderation.<sup>46</sup> 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.

78. 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.”<sup>47</sup> He also revealed that developers had started to “build specific 17-plus experiences.”<sup>48</sup> 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.<sup>49</sup>

79. 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.<sup>50</sup>

80. By limiting safety measures, Defendant not only increased its users but also reduced the company’s safety expenses as a percentage of its revenue—a key metric for Wall Street, which views trust and safety costs as detrimental to Defendant’s stock performance. 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.”<sup>51</sup> Barclays also wrote that it viewed increased safety costs as a “negative” in Defendant’s quarterly earnings.

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<sup>46</sup> 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>.

<sup>47</sup> Roblox Corp., Q2 2023 Earnings Conference Call (Aug. 9, 2023).

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

<sup>49</sup> *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).

<sup>50</sup> HINDENBURG RSCH., *supra* note 23.

<sup>51</sup> Ross Sandler et al., *Back on Track Following the 1H Hiccup*, BARCLAYS (Aug. 1, 2024); 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).

81. During earnings calls for investors, Defendant frequently addresses questions from analysts about how trust and safety expenditures will evolve. 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 new users.

82. 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.<sup>52</sup> 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."<sup>53</sup>

83. At other times, Guthrie has reassured investors, stating, "look for trust and safety [costs] to scale below linear as we grow"<sup>54</sup> and that Defendant was "quite happy with" trust and safety costs growing "at a lower rate than our bookings growth."<sup>55</sup>

84. 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."<sup>56</sup>

85. Similarly, despite urging developers to build experiences intended for users aged 17 and older, Defendant did *not* implement any access restrictions for younger users.<sup>57</sup> 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

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<sup>52</sup> Roblox Corp., Q4 2023 Earnings Call (Feb. 7, 2024).

<sup>53</sup> *Id.* (emphasis added).

<sup>54</sup> Roblox Corp., Q4 2022 Earnings Conference Call (Feb. 15, 2023).

<sup>55</sup> Roblox Corp., Q3 2022 Earnings Conference Call (Nov. 8, 2023).

<sup>56</sup> Roblox Corp., Q2 2024 Earnings Conference Call (Aug. 1, 2024).

<sup>57</sup> Roblox Corp., Q4 2022 Earnings Conference Call (Feb. 15, 2023).

experiences having a majority of 13 plus [users], but *those are still experiences that are open to all ages.*”<sup>58</sup>

86. 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.”<sup>59</sup> That same employee added, “You have to make a decision, right? You can keep your players safe, but then it would be less of them on the platform. Or you just let them do what they want to do. And then the numbers all look good and investors will be happy.”<sup>60</sup>

87. 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.”<sup>61</sup>

88. 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.<sup>62</sup>

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

89. 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

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<sup>58</sup> Roblox Corp., Q3 2021 Earnings Call Q&A (Nov. 9, 2021) (emphasis added).

<sup>59</sup> HINDENBURG RSCH., *supra* note 23.

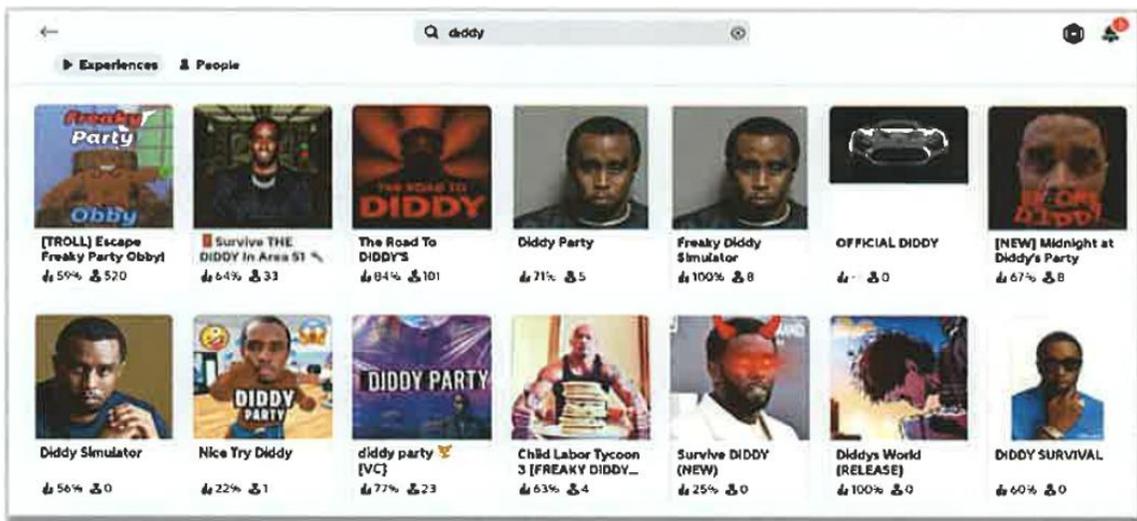
<sup>60</sup> HINDENBURG RSCH., *supra* note 23.

<sup>61</sup> ROBLOX, *Opening Keynotes | RDC (Roblox Developers Conference) 2023*, (YouTube, Sep. 8, 2023), <https://www.youtube.com/watch?v=CwLThCghzA4>.

<sup>62</sup> ROBLOX, *2024 Roblox Developers Conference Highlights*, (YouTube, Sep. 6, 2024), <https://www.youtube.com/watch?v=HwbcWc2CwnM>.

estimated that there are thousands of *inappropriate experiences* for children.<sup>63</sup> The report “even revealed a group of 3,334 members openly traded child pornography and solicited sexual acts from minors.”<sup>64</sup>

90. For example, the report confirmed that Defendant actively hosted over 600 “Diddy” games, with titles like “Survive Diddy,” “Run from Diddy Simulator,” and “Diddy Party,” which appear to recreate reported incidents involving the music mogul Sean Combs, publicly known as “Diddy.” Diddy was 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.<sup>65</sup>



*Examples of Roblox Games Modeled after Diddy’s Sex Trafficking Ventures*

91. 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.<sup>66</sup> Defendant also hosted games like “Escape to Epstein Island,” which, again, is a title that directly references one of the locations where, for years, Jeffrey Epstein brought minors and other non-consenting individuals so he and others could

<sup>63</sup> HINDENBURG RSCH., *supra* note 23.

<sup>64</sup> 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).

<sup>65</sup> HINDENBURG RSCH., *supra* note 23.

<sup>66</sup> HINDENBURG RSCH., *supra* note 23.

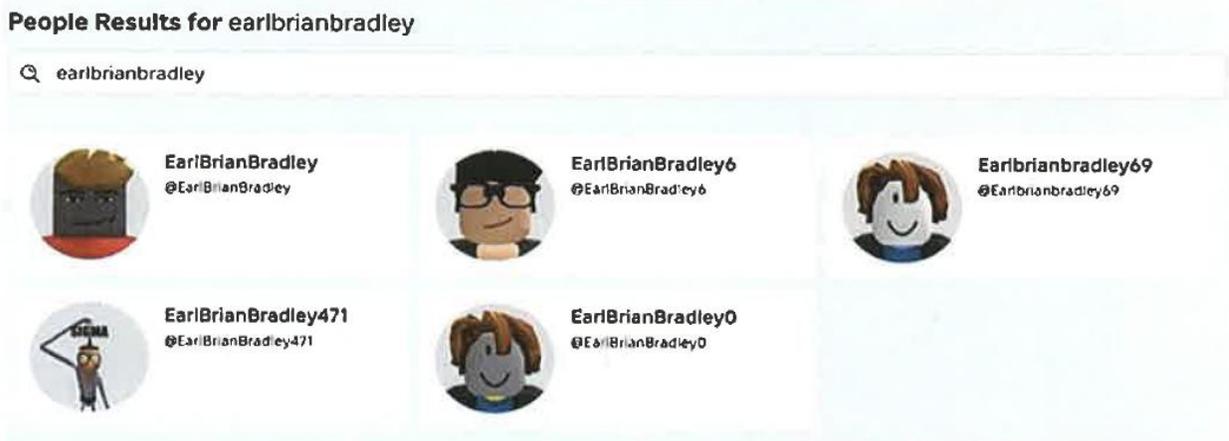
sexually and physically abuse them.<sup>67</sup> Defendant has knowingly and recklessly designed, hosted, and enabled an online platform marketed to children with rampant, sexually exploitative experiences.

**IV. DESPITE KNOWING THE SEVERE DANGERS AND REPORTS OF ABUSE, ROBLOX CONTINUES TO DECEPTIVELY AND FALSELY MARKET SAFETY AND STRICT CONTENT MODERATION**

**A. Roblox Has Long Been Aware of CSAM and Child Abuse**

92. 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.

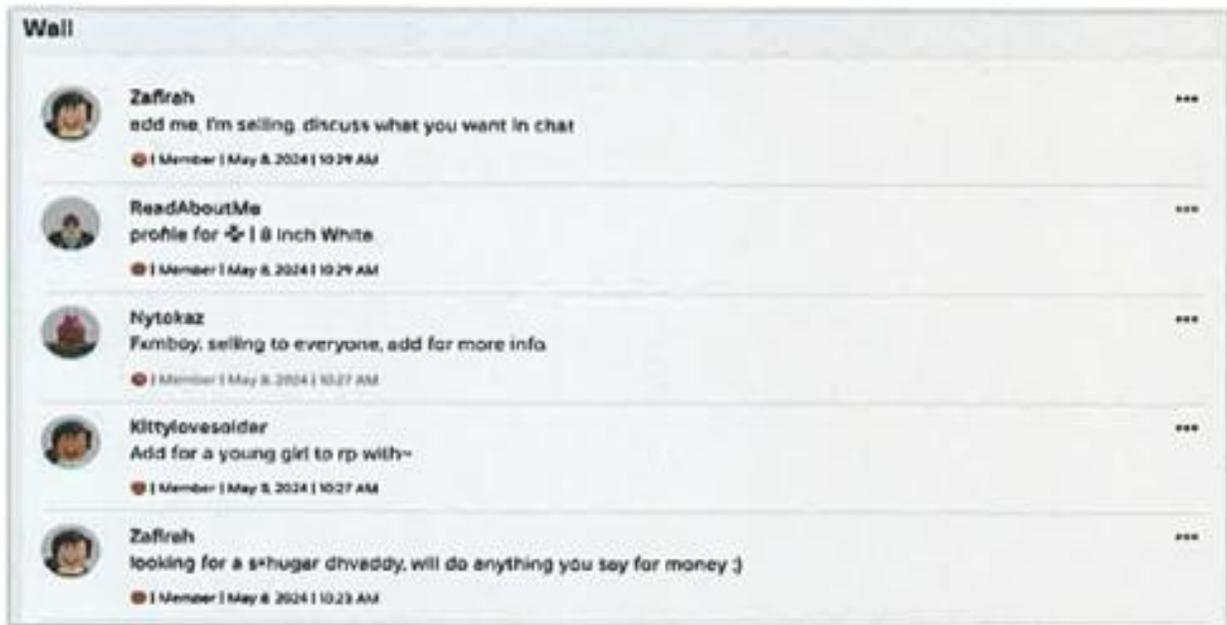
93. Many predators do not even hide their intentions, roaming Roblox with usernames like “@igruum\_minors,” “@RavpeTinyKldsJE,” and “@EarlBrianBradley”—a reference to one of the most prolific pedophiles ever, who raped and molested hundreds of children.<sup>68</sup> Defendant is aware of the users using 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”*

<sup>67</sup> HINDENBURG RSCH., *supra* note 23.

<sup>68</sup> HINDENBURG RSCH., *supra* note 23.



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

94. 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), whether players could be nude.<sup>69</sup>

### **B. Roblox Repeatedly Refuses To Take Common Sense Precautions to Protect Kids**

95. Despite promising parents that it takes “every precaution possible,” Roblox has consistently refused to implement reasonable, common sense, and feasible safety precautions.

96. For example, 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.

97. Defendant further endangered children by exposing them to real-time audio communications from adults.

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<sup>69</sup> Joseph Cox & Emanuel Maiberg, *Leaked Documents Reveal How Roblox Handles Grooming and Mass Shooting Simulators*, VICE (Aug. 1, 2022), <https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/>.

98. Defendant added a voice-chat feature in 2021 called “Spatial Voice” that lacked appropriate guardrails to prevent adult predators from speaking to children. Although this feature purportedly required users to be 13+ and verified in order to speak, it included no safety measures to protect children from strangers speaking *to them*. And Defendant failed to create the capability for moderators or its safety team to review those inappropriate communications.<sup>70</sup>

99. Defendant followed up 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.”<sup>71</sup>

100. Defendant pushed these changes despite knowing that its voice moderation capabilities were limited, relying primarily on user reporting of inappropriate conduct. And while Roblox eventually began to use artificial intelligence to moderate some language in voice chats, that did not include efforts to move minor users off platform.

### **C. Defendant Falsely and Deceptively Represented Itself as Safe**

101. 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 Roblox is safe for children.<sup>72</sup> 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.

102. Over the years, for example, Defendant has reiterated 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.”<sup>73</sup>

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<sup>70</sup> *Safety Features: Chat, Privacy & Filtering*, ROBLOX (Nov. 15, 2021), <https://web.archive.org/web/20211115003245/https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-FeaturesChat-Privacy-Filtering>.

<sup>71</sup> Josh Taylor, *Roblox Under Fire After Adding Controversial Voice Call Feature*, DEXERTO (Nov. 15, 2023), <https://www.dexerto.com/roblox/roblox-under-fire-after-adding-controversial-voice-call-feature-2384564/>.

<sup>72</sup> Kerry Breen, *Experts, Users Warn About Explicit Content on Popular Gaming Platform Roblox*, TODAY.COM (Oct. 20, 2021), <https://www.today.com/parents/roblox-experts-users-warn-about-inappropriate-content-t235027>.

<sup>73</sup> *Frequently Asked Questions (FAQs)*, ROBLOX, <https://web.archive.org/web/20071016081328/http://www.roblox.com:80/Parents/RobloxGuide.aspx> (archived Oct. 16, 2007).

103. 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.”<sup>74</sup>

104. 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.<sup>75</sup>

105. 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 protect the safety of our community while allowing players to imagine, create, and play together in a family- friendly environment.”<sup>76</sup>

106. Defendant similarly has advertised Roblox as “a safe, moderated place to meet, play, chat, and collaborate on creative projects.”<sup>77</sup>



*Excerpt from Roblox Parents’ Guide in 2017*

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<sup>74</sup> *Keeping Kids Safe*, ROBLOX, <https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx> (archived May 1, 2008).

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

<sup>76</sup> *Parents’ Guide*, ROBLOX, <https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/> (archived Jul.16, 2017).

<sup>77</sup> *Id.*

107. 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.”<sup>78</sup> 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.”<sup>79</sup> Defendant emphasized that it is “committed to ensuring that Roblox is a safe and fun place for everyone.”<sup>80</sup> According to Defendant, it “goes above and beyond to foster an environment where people of any age can create, play, learn, and imagine safely. We’ve kept children’s privacy and safety top-of-mind when designing our platform, especially through the implementation of advanced text filters that block inappropriate language or other unsafe content.”<sup>81</sup>

108. 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.”<sup>82</sup>

109. 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.”<sup>83</sup> 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”<sup>84</sup>; 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

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<sup>78</sup> *For Parents*, ROBLOX, <https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/> (archived Apr. 5, 2023).

<sup>79</sup> *Id.*

<sup>80</sup> *Roblox FAQ*, ROBLOX <https://web.archive.org/web/20230328011957/https://corporate.roblox.com/faq/> (archived Mar. 28, 2023).

<sup>81</sup> Roblox, *Roblox & User Data FAQ*, <https://en.help.roblox.com/hc/en-us/articles/4406238486676-Roblox-User-Data-FAQ> (last visited May 5, 2025).

<sup>82</sup> 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).

<sup>83</sup> *Safety Features: Chat, Privacy & Filtering*, ROBLOX, <https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering> (last visited May 5, 2025).

<sup>84</sup> 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 16, at 31.

platform”; and its chat filters for inappropriate content, which “are even stricter” for children under 13 and “include any potentially identifiable personal information, slang etc.”<sup>85</sup> As recently as January 2026, Roblox’s CEO referred to Roblox as “the gold standard of safety.”<sup>86</sup>

110. 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.

111. Defendant is required to submit its Roblox application to Apple’s App Store 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.

112. 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.”

113. 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.”<sup>87</sup>

114. 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.”<sup>88</sup> 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.”<sup>89</sup>

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<sup>85</sup> *Safety & Civility at Roblox*, ROBLOX, <https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox> (last visited Nov. 4, 2025).

<sup>86</sup> <https://about.roblox.com/newsroom/2026/01/roblox-age-checks-required-to-chat>

<sup>87</sup> *Get Started: Age Ratings*, APPLE, <https://apple.co/3ydIBeh> (last visited Oct. 10, 2025).

<sup>88</sup> *Roblox*, APP STORE, <https://apple.co/3SQAI6f> (last visited Oct. 10, 2025).

<sup>89</sup> *Id.*

115. At all times relevant, Defendant knew 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 often sexual content, nudity, mature and suggestive themes, and profanity and crude humor appear on the platform.

116. 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 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.”<sup>90</sup> 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.”

117. 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 Nebraska consumers.

118. 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.

119. 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.”<sup>91</sup>

120. 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

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<sup>90</sup> *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](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).

<sup>91</sup> 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).

and offensive individuals as well as from indecent and distasteful content,” taking a sentence verbatim from Roblox’s webpage for parents.<sup>92</sup>

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

122. In 2018, Bhaumik told the *Washington Post* that Defendant “focus[es] on making sure that everything is done in a safe and appropriate way.”<sup>93</sup> 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.”<sup>94</sup> 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.”<sup>95</sup>

123. 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.”<sup>96</sup> 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.”<sup>97</sup>

124. In a 2021 interview with *Axios*, Roblox’s CEO, David Baszucki, stated, “Everything is reviewed by over 2,000 real life humans, in addition to all the cool ML [Machine Learning] and AI [Artificial Intelligence] stuff.”<sup>98</sup>

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<sup>92</sup> Tony Sims, *Interview with David Baszucki, Founder & CEO of Roblox*, WIRED (Feb. 7, 2013), <https://www.wired.com/2013/02/roblox/>.

<sup>93</sup> 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/>.

<sup>94</sup> Chris Pollard, *Danger to Kids Police Warn that Children as Young as Five-Years-Old Are Seeing Naked Lego Type Characters Having Sex on Roblox App*, THE SUN (Jan. 29, 2018), [thesun.co.uk/news/5445444/roblox-app-children-danger-sex-warning/](https://www.thesun.co.uk/news/5445444/roblox-app-children-danger-sex-warning/).

<sup>95</sup> *Id.*

<sup>96</sup> 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>.

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

<sup>98</sup> 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>.

125. 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.”<sup>99</sup> 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.”<sup>100</sup> With these and other measures, she exclaimed, “[a]ny sort of bad actor that comes onto the platform is dealt with swiftly” and “[w]e remove any content that’s reported to us within minutes.”<sup>101</sup>

126. 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.<sup>102</sup>

127. 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.

128. 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.”<sup>103</sup> According to Kaufman, “For users under 13, our filters block sharing of personal information and attempts to take conversations off Roblox, where safety standards and moderation are less stringent.” A few months later, he added, “Safety is and always has been foundational to everything we do at Roblox.”<sup>104</sup>

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<sup>99</sup> 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-itsafelyroblox-vp-of-digital-civility-partnerships/1338989609901259/>.

<sup>100</sup> 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](https://www.youtube.com/watch?v=LT5_bBOYS9A).

<sup>101</sup> *Id.*

<sup>102</sup> ROBLOX, *supra* note 93.

<sup>103</sup> 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>.

<sup>104</sup> 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>.

129. 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.”<sup>105</sup>

130. Defendant’s public statements and promises that it has made over the years and continues to make to date are 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.

131. 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, FOSI’s CEO, as endorsing Defendant’s new features as a win for child safety.<sup>106</sup> 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.<sup>107</sup> This calculated relationship exposes how Defendant manipulates public perception by using seemingly independent safety organizations as mouthpieces to shape the narrative in its favor.

132. 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.

133. 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.

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

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<sup>105</sup> 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>.

<sup>106</sup> Anna Halkidis, *What Roblox’s Latest Changes Mean for Your Kids’ Online Safety*, PARENTS (Nov. 18, 2024), <https://www.parents.com/roblox-new-parental-controls-8747405>.

<sup>107</sup> *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
<p>“Kids of all ages can <b>safely</b> interact” Roblox is “a safe, moderated place”</p>	<p>Roblox has known of pervasive sexual predators on its platform since at least 2010</p>
<p>“We take <b>every precaution possible</b> to make sure kids are protected from inappropriate and offensive individuals”</p>	<p>Permits adults to message children, and migrate interactions off-platform</p> <p>No age verification; No minimum age; No effective parental controls</p> <p>Allows proliferation of highly graphic in-game experiences without content designations or age restrictions</p> <p>Markets to pre-teens</p> <p>Overlooks open child predators and lets banned users rejoin the platform by making a new account</p> <p>Rejected safety warnings</p> <p>Encourages adult users and “dating”</p>
<p>“Won’t allow language ... <b>used in a sexual context</b>”</p>	<p>Sexual language, solicitation, and exploitation are rampant</p>
<p>“We prohibit content <b>that depicts sexual activity</b> or seeks real world romantic relationships”</p>	<p>“Experiences” include “strip club,” “public bathroom,” “Diddy” “Epstein”</p> <p>Roblox avatars can remove clothes and simulate sex</p>

“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 TO CHILDREN

135. Roblox’s misrepresentations have led to children being unnecessarily exposed to child pornography, child grooming, actual physical abuse, and even murder<sup>108</sup> and suicide.<sup>109</sup>

136. A 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.”<sup>110</sup> And tracking these members unearthed additional Roblox groups engaged in the same criminal conduct, including one massive group with 103,000 members.<sup>111</sup> Yet Defendant failed to implement any age restrictions on these criminal groups or remove them entirely, deliberately leaving them accessible to all users.<sup>112</sup>

137. As a result of Defendant’s failures, many children have been seriously abused and harmed on Roblox. Children have been abducted, groomed, blackmailed, or raped by predators who found them on Roblox. One Nebraska victim from Adams County brought a lawsuit against Roblox in federal court claiming when he was approximately fourteen to fifteen years old, he was contacted on Roblox by an adult user

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<sup>108</sup> <https://www.justice.gov/usao-sdoh/pr/columbus-man-arrested-connection-indiana-teens-death-now-faces-federal-exploitation>

<sup>109</sup> <https://nypost.com/2026/02/06/us-news/dad-claims-daughter-16-took-life-after-meeting-a-predator-on-roblox/>

<sup>110</sup> HINDENBURG RSCH., *supra* note 23.

<sup>111</sup> *Id.*

<sup>112</sup> *Id.*

posing as a child through a housing-themed game.<sup>113</sup> The adult used Roblox’s in-game interactions and private messaging features over an extended period to build trust, obtain the minor’s personal information, and arrange an in-person meeting under false pretenses, which resulted in the minor being transported to the adult’s home and sexually assaulted.<sup>114</sup>

138. Another 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.<sup>115</sup>

139. Similarly, a Maryland man 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 of producing child sexual abuse material.<sup>116</sup> 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.<sup>117</sup> And a Delaware man was recently sentenced to 20 years in prison for coercion and enticement of a minor he communicated with via Roblox.<sup>118</sup>

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

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<sup>113</sup> Kiefer Zabel, *Central Nebraska Man Sues Roblox, Alleging Predator Groomed Him on Game*, KSNB (Oct. 28, 2025), <https://www.ksnblocal4.com/2025/10/28/nebraska-man-sues-roblox-alleging-predator-groomed-him-game/>; *GGH and Milberg Sue Roblox for Allegedly Enabling Sexual Predator Who Groomed and Assaulted Teen User*, GOULD, GRIECO & HENSLEY (Oct. 28, 2025), <https://gghlaw.com/press-releases/october-2025-roblox-lawsuit-nebraska-press-release-14-year-old-sexually-assaulted/>.

<sup>114</sup> *Id.*

<sup>115</sup> *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>.

<sup>116</sup> *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-sex-tortion-more-100-minors-located-throughout-united>.

<sup>117</sup> *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>.

<sup>118</sup> *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>.

producing explicit sexual and self-harm material.<sup>119</sup> In February 2025, a sixteen-year-old minor committed suicide after extensive grooming from a Roblox predator affiliated with “764.”<sup>120</sup> Although the family used parental monitoring tools and periodically supervised her activity, the victim’s father said he did not understand the extent of Roblox’s social and messaging functionality or the risks it posed to children.<sup>121</sup> The initial contact occurred while the victim was using Roblox’s communication features, after which the predator exploited the relationship and encouraged self-harm through ongoing private communications.<sup>122</sup> Following her death, the father discovered messages evidencing a prolonged grooming process that began on Roblox and later migrated to third-party applications.<sup>123</sup>

141. Parents of children harmed by predators on Roblox have increasingly begun to bring lawsuits against Defendant 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.<sup>124</sup>

142. To name just a few other examples from this year alone, Roblox faces lawsuits from the families of a 13-year-old Texas girl,<sup>125</sup> a 10-year-old California girl,<sup>126</sup> and an 11-year-old New Jersey girl,<sup>127</sup> all of whom were sexually abused by adults who met and groomed them on the platform.

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<sup>119</sup> 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>.

<sup>120</sup> Rikki Schlott, *Dad claims 16-year-old daughter took her own life after meeting a predator on Roblox, slams game platform beloved by kids*, NEW YORK POST (Feb. 6, 2026), <https://nypost.com/2026/02/06/us-news/dad-claims-daughter-16-took-life-after-meeting-a-predator-on-roblox/>.

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

<sup>122</sup> *Id.*

<sup>123</sup> *Id.*

<sup>124</sup> 10 NEWS, *supra* note 5.

<sup>125</sup> 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>.

<sup>126</sup> Complaint ¶ 34, *Doe v. Roblox Corp.*, No. 25-CIV-01193 (San Mateo Cnty. Super. Ct., filed Feb. 12, 2025).

<sup>127</sup> 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/>.

## VI. ONLY AFTER FACING LEGAL PRESSURE, ROBLOX IMPLEMENTS POLICY CHANGES—BUT THEY ARE INSUFFICIENT AND TOO LATE

143. 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 “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.”<sup>128</sup>

144. Parent reviews of Roblox on sites like *Common Sense Media* also document disturbing incidents of naked avatars, sexting, simulated sexual assault, and adult predators.<sup>129</sup>

145. 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.”<sup>130</sup> Released on October 8, 2024, the report sparked public outrage, detailing many issues described above that Defendant had long ignored.

146. 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<sup>131</sup>; 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<sup>132</sup>; 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.<sup>133</sup>

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<sup>128</sup> HINDENBURG RSCH., *supra* note 23.

<sup>129</sup> *Parent Reviews of Roblox*, COMMON SENSE MEDIA, <https://www.commonsensemedia.org/website-reviews/roblox/user-reviews/adult> (last visited Dec. 16, 2025).

<sup>130</sup> HINDENBURG RSCH., *supra* note 23.

<sup>131</sup> *Roblox Tightens Messaging Rules for Under-13 Users Amid Abuse Concerns*, REUTERS (Nov. 18, 2024), <https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/>.

<sup>132</sup> Robert Booth, *Roblox to Give Parents More Control Over Children’s Activity After Warnings Over Grooming*, THE GUARDIAN, (Nov. 18, 2024), <https://www.theguardian.com/technology/2024/nov/18/roblox-to-hand-parents-more-control-over-their-childrens-activity>.

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

147. 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.

148. In July 2025, Defendant announced the rollout of an optional feature called Trusted Connections for teenage users that permits unfiltered voice and text chats.<sup>134</sup> 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.<sup>135</sup> 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.<sup>136</sup>

149. 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.<sup>137</sup>

150. 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 “experiences” within the platform that depict private spaces (such as bedrooms) or are intended for adults (such as bars).<sup>138</sup>

151. The following month, Defendant restricted all users’ access to experiences that were “unrated,” meaning they lacked a maturity label.<sup>139</sup> Previously, anyone who listed a birthdate that would put their age at over 13 years old could access such experiences.<sup>140</sup>

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<sup>134</sup> 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/>.

<sup>135</sup> *Id.*

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

<sup>137</sup> 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>.

<sup>138</sup> 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/>.

<sup>139</sup> 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/>.

<sup>140</sup> Tom Bowen, *How to Access Unrated Experiences in Roblox*, GAMERANT (May 18, 2025), <https://gamerant.com/roblox-unrated-experience-join-fix/>.

152. 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.<sup>141</sup>

153. 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.<sup>142</sup>

154. Just last month, Roblox announced a new policy effective January 1, 2026 that would require users to verify their ages via facial age estimation or government-issued ID in order to access text and audio chat features, assign users into age groups, and restrict chat functions between users of disparate groups.<sup>143</sup>

155. This policy change uses technologies that were possible and feasible for Roblox to implement all along and is a belated response to the growing torrent of lawsuits.

156. And it shows that Roblox can verify users’ ages when they create an account, but continues not to, which lets minors access adult-oriented experiences even when they are age-restricted.

157. Indeed, none of these changes involve any new or groundbreaking technology. Every one of them could have been implemented years ago. And they remain inadequate to address the ongoing harms.

158. Even with recent policy updates, Defendant lacks enough 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 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.

159. 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. But while Defendant uses that software for other purposes, Defendant intentionally does not use this feature when new accounts are created. As such, Defendant also still relies on self-reported birthdays for age verification, and Roblox is intentionally or recklessly designed to allow users to create accounts using

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<sup>141</sup> Bošnjak, *supra* note 139.

<sup>142</sup> See, e.g., r/roblox, REDDIT (Aug. 2025), [https://www.reddit.com/r/roblox/comments/1ms21ku/they\\_already\\_put\\_it\\_back\\_this\\_is\\_disgusting/](https://www.reddit.com/r/roblox/comments/1ms21ku/they_already_put_it_back_this_is_disgusting/) (last visited Nov. 4, 2025) (describing “Dollhouse Roleplay” experience known to be used by sexual exploitation ring 764 to groom minors).

<sup>143</sup> *Roblox Expands Facial Age Checks for Communication, Setting New Safety Standard*, ROBLOX (Nov. 18, 2025), <https://ir.roblox.com/news/news-details/2025/Roblox-Expands-Facial-Age-Checks-for-Communication-Setting-New-Safety-Standard>.

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.

160. Now, under Roblox’s default settings, adults cannot directly message children under 13, outside of “experiences.” Yet 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*

161. In late 2025, a researcher who created an account as an eight-year-old was able to access apparently endless inappropriate experiences—“bathroom simulator games, dungeons, casinos, horror games, escape rooms and countless role-playing games where I can send and receive messages from strangers.”<sup>144</sup> And when she accessed Roblox as a thirteen-year-old girl, a male player sexually assaulted her avatar. This all occurred “with all parental controls in place.”<sup>145</sup>

162. Despite claiming to employ “age checks” to protect younger users, Roblox’s own support documentation reveals that its system *permits users to freely change their birthday in account settings* without any meaningful verification, and the primary age-estimation method merely analyzes a user’s uploaded image or video to

<sup>144</sup> Sarah Martin, *My Chilling Week on Roblox: Sexually Assaulted and Shat on as a Child Avatar Roaming the Online World*, THE GUARDIAN (Nov. 5, 2025), <https://www.theguardian.com/games/.2025/nov/05/roblox-game-roblox-children-child-kidssafety-parental-controls>.

<sup>145</sup> *Id.*

assign them to a broad age bracket rather than actually verifying identity or birthdate.<sup>146</sup> Because Roblox allows age changes through simple settings updates or by relying on parent account adjustments after facial estimation, there is virtually no barrier preventing users, including minors, from misrepresenting their age and thereby gaining access to age-gated features, completely undermining the purported safety goal of the age-check regime.

163. Despite these failures, Defendant continues to falsely and aggressively market itself as an “industry leader” when it comes to child safety.<sup>147</sup> 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.<sup>148</sup>

164. 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 known as a symbol for Snapchat, or alternative spellings, like “Snappy” or “apchat.” Similarly, while the word “Discord” is blocked, users can bypass this filter by using the disc emoji or typing variations, like “iscord” or “cord.”<sup>149</sup>

165. 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.<sup>150</sup>

166. 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

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<sup>146</sup> Roblox, *Understanding Age Checks on Roblox*, Roblox Support (last visited Feb. 12, 2026), <https://en.help.roblox.com/hc/en-us/articles/39143693116052-Understanding-Age-Checks-on-Roblox>.

<sup>147</sup> Roblox Corp., Q1 2021 Earnings Conference Call (May 11, 2021).

<sup>148</sup> *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).

<sup>149</sup> Edwin Dorsey, *Problems at Roblox (RBLX) #5*, THE BEAR CAVE (Oct. 17, 2024), <https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

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

(made available by Defendant), messages can easily slip by the filters.<sup>151</sup> Other developers note that by using “letter emojis” (again, provided by Roblox) instead of letters, content can sail easily through Roblox’s filters.<sup>152</sup> These developers describe this as “a serious problem” and many seem to wonder why Defendant has failed to fix these issues.

167. Roblox’s approach to chat contrasts sharply with other gaming services like Nintendo, which use preprogrammed dialogue options to tightly control user interactions.<sup>153</sup> 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.

168. Further, these changes are little more than window dressing—too little, too late, and inadequate. In essence, 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.<sup>154</sup>

169. 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.

170. 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.<sup>155</sup> Because Roblox still

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<sup>151</sup> *Uh, Roblox? Theres a Way to 100% PERFECTLY Bypass the Chat Filter. Something Needs to be Done*, DEVFORUM, <https://devforum.roblox.com/t/uh-roblox-theres-a-way-to-100-perfectly-bypass-the-chat-filter-something-needs-to-be-done/3370284/5> (last visited Nov. 4, 2025).

<sup>152</sup> *Chatfilter Bypass Method*, DEVFORUM, <https://devforum.roblox.com/t/chatfilter-bypass-method/3094582> (last updated Aug. 19, 2024) (last visited Nov. 4, 2025).

<sup>153</sup> Carville & D’Anastasio, *supra* note 39.

<sup>154</sup> In an interview with BBC News, a reporter confronted Baszucki with a series of experiences that her 11-year-old son was recommended. One of these included ““Late Night Boys and Girls Club RP,”” which had a maturity rating of “mild.” In this experience, players would still be permitted to message each other in the game. BBC TELEVISION HOME, *Gaming Empire: The Roblox Story* (BBC News), (YouTube, Mar. 17, 2025), <https://www.youtube.com/watch?v=LQztK0MCUAc>.

<sup>155</sup> *A Digital Playground: The Real Guide to Roblox*, REVEALING REALITY (Apr. 13, 2025), <https://think.revealingreality.co.uk/roblox-real-guide>.

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.<sup>156</sup> 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 exist are limited in their effectiveness and there are still significant risks for children on the platform.”<sup>157</sup>

171. And yet, despite the failed rollout of its belated age verification system, Roblox continues to claim that this “new era of safety” is the “gold standard.”<sup>158</sup> Roblox even audaciously dismisses criticism of its AI age verification, asserting that “we are pleased with where we are in the roll out process.”<sup>159</sup>

172. 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.<sup>160</sup> 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 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.<sup>161</sup>

173. Beyond Defendant’s deliberately ineffective technology, the company also employs an 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, other platforms have teams of up to 40,000 dedicated content

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<sup>156</sup> *Parental Controls Overview*, ROBLOX, <https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview> (last accessed October 10, 2025).

<sup>157</sup> REVEALING REALITY, *supra* note 154.

<sup>158</sup> Matt Kaufman & Rajiv Bhatia, *A New Era of Safety: Facial Age Checks Now Required to Chat on Roblox*, Roblox (Jan. 7, 2026), <https://about.roblox.com/newsroom/2026/01/roblox-age-checks-required-to-chat>.

<sup>159</sup> Matt Binder, *Roblox’s new age verification is reportedly fooled by shockingly simple tactics*, Mashable (Jan 14, 2026), <https://mashable.com/article/roblox-age-verification-system-fooled>.

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

<sup>161</sup> *Id.*

moderators.<sup>162</sup> 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.”<sup>163</sup> But the reality tells a different story. Defendant’s moderators, many of whom are actually poorly trained and underpaid overseas contractors, report being overwhelmed by an unmanageable volume of child safety reports.<sup>164</sup>

## CAUSES OF ACTION

### Count I

#### **Violations of the Nebraska Consumer Protection Act (CPA)**

#### **Neb. Rev. Stat. §§ 59-1601 et seq.**

#### **(Deception)**

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

192. The Consumer Protection Act, Neb. Rev. Stat. § 59-1602, prohibits “deceptive acts or practices in the conduct of any trade or commerce.”

193. An act or practice is deceptive if the act or practice possessed the tendency or capacity to mislead or created a likelihood of deception.

194. Defendant is a “person” under Neb. Rev. Stat. § 59-1601(1), which includes corporations.

195. Defendant engages in “trade and commerce” as defined in Neb. Rev. Stat. § 59-1601 through the sale of goods and services and commerce directly and indirectly affecting the people of the State of Nebraska.

196. As specified in more detail above, Defendant engaged in deceptive acts or practices in the conduct of trade or commerce in violation of Neb. Rev. Stat. § 59-1602 by, without limitation:

- (a) Creating, distributing, promoting, offering for sale, attempting to sell, and selling goods and services while providing false and misleading safety assurances about those goods and services including, but not limited to
  1. “Everything is reviewed by over 2,000 real life humans, in addition to all the cool ML [Machine Learning] and AI [Artificial Intelligence] stuff.”

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<sup>162</sup> Carville & D’Anastasio, *supra* note 39.

<sup>163</sup> Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety Features, Past Cases of Child Abuse on the Platform*, WBUR (Nov. 18, 2024), <https://www.wbm.org/hereandnow/2024/11/18/roblox-safetyfeatures>.

<sup>164</sup> Carville & D’Anastasio, *supra* note 39.

2. Roblox’s “safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate.”
3. “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.”
4. Roblox conducts a “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”
5. Roblox ensures that “[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.”
6. Roblox has implemented 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
7. Roblox “won’t allow language that is used to harass, discriminate, incite violence, threaten others, or used in a sexual context.”
8. Roblox is an “online virtual playground . . . where kids of all ages can safely interact, create, have fun, and learn.”
9. Roblox is “a safe, moderated place to meet, play, chat, and collaborate on creative projects.”
10. “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.”
11. Roblox has “stringent safety system and policies” including “expertly trained team with thousands of members dedicated to protecting our users and monitoring for inappropriate content”
12. Roblox’s “number one priority” is “to create a safe, civil, and inclusive community” and “[s]afety and civility has always been baked into everything that we do.”
13. “Safety is and always has been foundational to everything we do at Roblox.”
14. Roblox “goes above and beyond to foster an environment where people of any age can create, play, learn, and imagine safely.”

15. “We take every precaution possible to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content.”

16. “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.”

(b) Creating, distributing, promoting, offering for sale, attempting to sell, and selling services, that provide misleading app store age-ratings.

197. Defendant’s conduct and deceptive acts seriously affect the public interest by exposing children statewide to elevated risks, misleading and deceiving Nebraska parents and the public about the grave threats to children that exist on their platform, damaging family welfare and state safety interests, and causing Nebraska parents and children to spend their money on Robux and share their data with Roblox after having been deceived about the dangers of the platform and its safety precautions. Nebraska consumers have suffered injury: they have paid for Robux and subscriptions under the false safety assurances, lost the benefit of promised protections, and faced risk/harm to child users.

198. The CPA “empowers the attorney general to bring an action to restrain such conduct and permits the prevailing party to recover, in the discretion of the court, the costs of the lawsuit, including a reasonable attorney fee.” § 59-1608(1).

199. Plaintiff seeks: (a) a permanent injunction prohibiting Roblox’s unfair and deceptive acts and practices under Neb. Rev. Stat. § 59-1608(1); (b) restitution or disgorgement of profits reasonably allocable to Nebraska transactions under Neb. Rev. Stat. § 59-1608(2); (c) civil penalties in the amount of \$2,000 per violation under Neb. Rev. Stat. § 59-1614; and (d) costs and reasonable attorneys’ fees under Nebraska Revised Statute § 59-1608(1).

## **Count II**

### **Violations of the Nebraska Uniform Deceptive Trade Practices Act (UDTPA)**

#### **Neb. Rev. Stat. §§ 87-301 to 87-306**

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

201. Section 87-302(a) of the Uniform Deceptive Trade Practices Act prohibits multiple practices that, when conducted in the course of business, constitute prohibited deceptive trade practices, including but not limited to:

- (a) Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have Neb. Rev. Stat. § 87-302(a)(5);
- (b) Representing that goods or services do not have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they have,” Neb. Rev. Stat. § 87-302(a)(6);
- (c) Representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another Neb. Rev. Stat. § 87-302(a)(8);
- (d) Advertising goods or services with intent not to sell them as advertised Neb. Rev. Stat. § 87-302(a)(10);

202. Defendant is a “person” within the meaning of the Uniform Deceptive Trade Practices Act, Neb. Rev. Stat. § 87- 301(19).

203. Defendant is acting “in the course of [its] business” within the meaning of the Uniform Deceptive Trade Practices Act, Neb. Rev. Stat. § 87-302(a).

- (a) In the course of its business, Defendant knowingly engaged in deceptive acts and practices in their representations and advertisements regarding Roblox’s design, safeguards, and safety monitoring. Roblox violated Neb. Rev. Stat. §§ 87-302(a)(5),(a)(6),(a)(8), (a)(10) by: Representing and falsely advertising to the public that services were safe for children thereby representing its services as having characteristics, uses, and benefits that it does not have.
- (b) Representing and falsely advertising to the public that its services did not involve substantial dangers for children thereby representing its services as not having dangerous characteristics or uses which it does in fact have.
- (c) Representing and falsely advertising its services are safe for children and that every precaution possible was implemented when, in actuality, its services pose serious harm and lack reasonable and feasible measures to protect children.
- (d) Misrepresenting and falsely advertising the size, training, employment status, policies, procedures, and success metrics of its content moderation division that allegedly protects children on its platform.

This conduct, as described above, was carried out through numerous deceptive representations and advertisements, including but not limited to the following:

- (e) “Everything is reviewed by over 2,000 real life humans, in addition to all the cool ML [Machine Learning] and AI [Artificial Intelligence] stuff.”

- (f) Roblox’s “safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate.”
- (g) “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.”
- (h) Roblox conducts a “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”
- (i) Roblox ensures that “[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.”
- (j) Roblox implements 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.
- (k) Roblox “won’t allow language that is used to harass, discriminate, incite violence, threaten others, or used in a sexual context.”
- (l) Roblox is an “online virtual playground . . . where kids of all ages can safely interact, create, have fun, and learn.”
- (m) Roblox is “a safe, moderated place to meet, play, chat, and collaborate on creative projects.”
- (n) “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.”
- (o) Roblox has implemented “stringent safety system and policies” including “expertly trained team with thousands of members dedicated to protecting our users and monitoring for inappropriate content”
- (p) Roblox’s “number one priority” is “to create a safe, civil, and inclusive community” and “[s]afety and civility has always been baked into everything that we do.”
- (q) “Safety is and always has been foundational to everything we do at Roblox.”
- (r) Roblox “goes above and beyond to foster an environment where people of any age can create, play, learn, and imagine safely.”

- (s) “We take every precaution possible to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content.”
- (t) “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.”

204. Pursuant to Neb. Rev. Stat. § 87-303.05, the Attorney General, with cause to believe that a person has engaged in or is engaging in any deceptive trade practice, “may apply for and obtain, in an action in any district court of this state, a temporary restraining order, or injunction, or both.” The Attorney General may also recover civil penalties for violations. Neb. Rev. Stat. § 87-303.11.

205. Defendant knowingly and willfully engaged in such deceptive and unfair trade practices.

206. Plaintiff seeks: (a) injunctive relief under Neb. Rev. Stat. § 87-303.05(1); (b) corrective disclosures; (c) civil penalties in the amount of \$2,000 per violation as provided by Neb. Rev. Stat. § 87-303.11(1); and (d) costs and reasonable attorneys’ fees under Neb. Rev. Stat. § 87-303(b).

### **Count III** **Negligence (Failure to Warn)**

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

208. Plaintiff brings this cause of action against Defendant under its common law and/or *parens patriae* authority, as well as under the Attorney General’s statutory authority to initiate litigation when in the interests of the State of Nebraska. *See* Neb. Rev. Stat. § 84-205.

209. Plaintiff alleges that Defendant owed a duty to warn children and parents of the known risks associated with its platform because Defendant’s conduct in designing and operating the platform created risks of physical and emotional harm, and Defendant had actual knowledge of those risks and was in a superior position to understand and communicate those risks to users who would otherwise remain unaware of the dangers.

210. Defendant knew that the platform was wildly popular with child predators, had a high rate of child predators, and that its design and absence of safeguards carried non-obvious but serious risks of grooming, extortion of sexual content, migration to other apps, sexual exploitation, addiction, psychological harms, and uncontrolled spending.

211. Defendant failed to provide adequate warnings to children and parents (in-product alerts, safety prompts, real-time blocking of hand-off signals, alerts when interactions become suspicious).

212. An ordinary person would not have marketed the product without warnings or instructions as to the risks and dangers involved in its use.

213. As a direct and proximate result of that failure, Nebraska minors and families sustained damages, including emotional harm, loss of safety, financial costs, and public-system burdens. Plaintiff seeks: (a) injunctive relief; and (b) damages in an amount to be determined at trial.

#### **Count IV** **Fraudulent and Negligent Misrepresentation**

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

215. Plaintiff brings this cause of action against Defendant under its common law and/or *parens patriae* authority, as well as under the Attorney General's statutory authority to initiate litigation when in the interests of the State of Nebraska. *See* Neb. Rev. Stat. § 84-205.

216. Defendant made material misrepresentations and omissions in public statements, website promises, executive quotes, and marketing including, but not limited to:

- (a) "Everything is reviewed by over 2,000 real life humans, in addition to all the cool ML [Machine Learning] and AI [Artificial Intelligence] stuff."
- (b) Roblox's "safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate."
- (c) "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."
- (d) Roblox conducts a "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"
- (e) Roblox ensures that "[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."
- (f) Roblox has implemented 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

- (g) Roblox “won’t allow language that is used to harass, discriminate, incite violence, threaten others, or used in a sexual context.”
- (h) Roblox is an “online virtual playground . . . where kids of all ages can safely interact, create, have fun, and learn.”
- (i) Roblox is “a safe, moderated place to meet, play, chat, and collaborate on creative projects.”
- (j) “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.”
- (k) Roblox has a “stringent safety system and policies” including “expertly trained team with thousands of members dedicated to protecting our users and monitoring for inappropriate content”
- (l) Roblox’s “number one priority” is “to create a safe, civil, and inclusive community” and “[s]afety and civility has always been baked into everything that we do.”
- (m) “Safety is and always has been foundational to everything we do at Roblox.”
- (n) Roblox “goes above and beyond to foster an environment where people of any age can create, play, learn, and imagine safely.”
- (o) “We take every precaution possible to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content.”
- (p) “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.”

217. Defendant either knew those statements were false, incomplete, or acted with reckless disregard for their truth. Alternatively, Defendant made them without using reasonable care (negligent misrepresentation).

218. Defendant intended Nebraska consumers to rely on these assurances when allowing minors to use Roblox and purchasing Robux and subscriptions. Nebraska consumers reasonably did so, suffering harm (overpayment, exposure to risk, loss of

promised protection, exposure to sexual material and sexual predators, and even sexual assault).

219. Nebraska minors and families sustained damages, including emotional harm, loss of safety, financial costs, and public-system burdens. Plaintiff seeks: (a) injunctive relief; and (b) damages in an amount to be determined at trial.

### **PRAYER FOR RELIEF**

WHEREFORE, the State of Nebraska respectfully requests that this Court:

- (a) Enter judgment in Plaintiff's favor and against Defendant, declaring that Defendant has violated the Nebraska Consumer Protection Act and the Nebraska Uniform Deceptive Trade Practices Act, and Nebraska common law;
- (b) Permanently enjoin and restrain Roblox Corporation and its agents, employees, and all other persons and entities, corporate or otherwise, including any person in active concert or participation with any of the foregoing, from engaging in the unfair, deceptive, and misleading conduct, acts, and practices alleged in this Complaint to be in violation of the Consumer Protection Act and/or the Uniform Deceptive Trade Practices Act pursuant to Neb. Rev. Stat. §§ 59-1608(1), and 87-303.05(1).
- (c) Award restitution and/or disgorgement of profits attributable to Nebraska users, including Robux and subscription revenues obtained through deceptive or unfair practices and revenue earned from the data of Nebraskans;
- (d) Award civil penalties as authorized by the Nebraska Consumer Protection Act and the Nebraska Uniform Deceptive Trade Practices Act;
- (e) Award actual and punitive damages;
- (f) Award costs and reasonable attorneys' fees as permitted by the Nebraska Consumer Protection Act and the Nebraska Uniform Deceptive Trade Practices Act; and
- (g) Grant such other and further relief as the Court deems just and proper.

### **DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury on all issues so triable.

Dated: March 4, 2026

Respectfully submitted,

/s/ Anna M. Anderson

Michael T. Hilgers, #24483

Nebraska Attorney General

Anna M. Anderson, #28080

Benjamin Swanson, #27675

Beatrice O. Strnad, #28045

**NEBRASKA DEPARTMENT OF  
JUSTICE**

2115 State Capitol

Lincoln, NE 68509-8920

(402) 471-2682 (telephone)

(402) 471-3835 (facsimile)

[anna.anderson@nebraska.gov](mailto:anna.anderson@nebraska.gov)

[benjamin.swanson@nebraska.gov](mailto:benjamin.swanson@nebraska.gov)

[bebe.strnad@nebraska.gov](mailto:bebe.strnad@nebraska.gov)

*Counsel for State of Nebraska*

Mark Pinkert, *pro hac pending*

HOLTZMAN VOGEL BARAN

JOSEFIAK TORCHINSKY PLLC

2333 Ponce de Leon Blvd.,

Suite 600.

Coral Gables, FL 33134

203-415-6665

[mpinkert@holtzmanvogel.com](mailto:mpinkert@holtzmanvogel.com)

Kellen Dwyer, *pro hac pending*

David Johnson, *pro hac pending*

HOLTZMAN VOGEL BARAN

JOSEFIAK TORCHINSKY PLLC

2300 N Street NW, Ste. 643

Washington, DC 20037

[kdwyer@holtzmanvogel.com](mailto:kdwyer@holtzmanvogel.com)

[djohnson@holtzmanvogel.com](mailto:djohnson@holtzmanvogel.com)

Brandon J. Smith, *pro hac pending*

HOLTZMAN VOGEL BARAN

JOSEFIAK TORCHINSKY PLLC

1221 Broadway, Ste. 2100  
Nashville, TN 37203  
[bsmith@holtzmanvogel.com](mailto:bsmith@holtzmanvogel.com)

Michael C. Martinich-Sauter, *pro hac  
pending*  
JAMES OTIS LAW GROUP, LLC  
530 Maryville Centre Drive, Suite 230  
St. Louis, MO 63141  
(314) 949-3018  
[michael.martinich-sauter@james-otis.com](mailto:michael.martinich-sauter@james-otis.com)