

**IN THE CHANCERY COURT OF WILLIAMSON COUNTY, TENNESSEE
FOR THE TWENTY-FIRST JUDICIAL DISTRICT AT FRANKLIN**

**STATE OF TENNESSEE, ex rel.
JONATHAN SKRMETTI, ATTORNEY
GENERAL and REPORTER,**

Docket No. _____

Plaintiff,

JURY DEMAND

v.

ROBLOX CORPORATION,

***Before the*
HONORABLE** _____

Defendant.

CIVIL ENFORCEMENT COMPLAINT

Plaintiff, the State of Tennessee, by and through its Attorney General and Reporter (the “State”), brings this civil law enforcement proceeding to stop Defendant Roblox Corporation’s (“Defendant,” “Roblox,” or the “Company”) deceptive and unfair business practices that risk Tennessee children’s safety and keep Tennessee parents in the dark to turn a profit on a digital playground where child predators roam free.

INTRODUCTION

1. Roblox is “an immersive gaming and creation platform that offers people millions of ways to be together, inviting its community to explore, create, and share endless unique experiences.”¹ It is one of the most popular online gaming platforms in history. In the third quarter of 2025, an average of 151.5 million daily active users spent a collective 39.6 billion hours on the

¹ Roblox, *What is Roblox*, available at <https://perma.cc/39D2-4MQ7> (last visited December 9, 2025).

Roblox platform. This activity generated \$1.36 billion for Roblox during the quarter, which was nearly a 50 percent increase in revenue from the same period in 2024.²

2. With *over two-thirds* of its daily active users under the age of 16, Roblox has cultivated an image of being a safe platform for children. Roblox repeatedly assures its users, its users’ parents, and the public that its top priority is protecting young players. But its assurances could not be further from the truth.

3. In reality, Roblox has built a massive, largely unsupervised online world, where adults and children mingle with little functional oversight. Beneath the bright animation and cheerful branding lies an environment in which child predators can—and do—make contact with minors, and where sexual content sits within easy reach to children, leaving them to navigate dangers they do not—and cannot—understand.

4. Roblox invites children into its fantastic world with the promise of creativity and play, while failing to erect even rudimentary guardrails against the dangers it knows exist. Indeed, Roblox has built an ecosystem that all but hands predators a roadmap to young users: the platform’s architecture lets adults spot minors with ease, strike up conversations, and slowly maneuver themselves into a position of influence over those children, to the point of grooming them through repeated interactions. Rather than dangling toys at the edge of a playground, predators on Roblox exploit the platform’s own irresistible draw: Robux—the virtual currency kids use to buy in-game perks and items. And because many children are desperate to get Robux without going to their parents for money, predators use it as the perfect bait to reel them in.

5. Another important aspect of Roblox is the “experiences” it offers, and which until November 2024 when Roblox implemented some age restrictions, any user could access. Through

² Roblox, *Shareholder Letter, Q3 2025*, available at <https://perma.cc/J3QT-NC9K> (last visited December 17, 2025).

these millions of different “experiences”—which anyone can create, but Roblox itself controls—Roblox invites children into immersive, user-built worlds, where their avatars can role-play family life or collect and care for virtual pets. Roblox claims it monitors its experiences and prohibits minors from accessing sexual content. But Roblox still hosts thousands of experiences with overtly sexual themes, including strip clubs, sex rooms, an “[e]scape to Epstein Island,” and “Diddy Party” (a recreation of the reported events concerning Sean “Diddy” Combs). And while Roblox implemented some superficial age restrictions on sexualized experiences in late 2024, these restrictions can be circumvented by simply giving the experience an innocuous name. One such experience (named “Public Bathroom Simulator”) was open to users under the age of 10 and rife with sexual activity. By letting this material proliferate within easy access of children—in direct contradiction of its own safety promises—Roblox shoved Tennessee children into harm’s way to keep revenue growing and engagement levels high.

6. Roblox has had countless chances to put real distance between children and the predators roaming its platform—from requiring genuine, informed parental consent before a minor can create and account to imposing age-appropriate access limits on the “experiences” it hosts. These fixes are obvious, easy, and long overdue. Yet for nearly twenty years, Roblox has done the exact opposite: it has allowed kids to create accounts with no age verification or parental involvement, permitted dangerous content to be widely accessible to all users, and then monetized the very interactions that put those children at risk.

7. Given the amount of criticism, public reporting, and litigation that has accumulated over the years, Roblox cannot claim ignorance about the existence, severity, or scope of its safety problems. And still, rather than protect Tennessee children as it promises to do, Roblox continues to fuel the conduct that led to their abuse, all while continuing to falsely advertise its platform as

“safe,” “family friendly,” and suitable for children. Roblox’s continued refusal to act—paired with its deliberate misrepresentations—has directly inflicted severe harm upon Tennessee families and their children.

8. In sum, through its acts, omissions, and misstatements, Roblox carefully curated a materially false and misleading impression that its platform was safe for children. By doing so, Roblox engaged in deceptive conduct that violates the Tennessee Consumer Protection Act of 1977 (“TCPA”), Tenn. Code Ann. §§ 47-18-101, *et seq.*

9. Based on this misconduct, and as more fully described below, Tennessee brings this action pursuant to Tennessee Code Ann. § 47-18-108 of the TCPA. Through this action, the State seeks injunctive relief, attorney’s fees and costs, civil penalties, and all other remedies, orders, and judgments authorized under Tennessee law.

PARTIES

10. Jonathan Skrmetti, Attorney General and Reporter of the State of Tennessee, is the chief legal officer of the State of Tennessee and may file suits necessary for the enforcement of the law and public protection. The Attorney General is also empowered by Tennessee law and his common law authority to bring an action in the name of Tennessee to enforce these laws and protect the public.

11. Defendant Roblox Corporation is a Delaware corporation with its principal place of business in San Mateo, California. Roblox developed, crafted, assembled, evaluated, promoted, publicized, distributed, sold, and/or otherwise released the Roblox product into the stream of commerce. It does so via both its online gaming platform (which is available to citizens in all fifty states, including the State of Tennessee) and the sale of prepaid cards through online and physical retailers in Tennessee.

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

JURISDICTION AND VENUE

13. In this Complaint, the State asserts causes of actions and seeks remedies, based exclusively on Tennessee statutory, common, and decisional law.

14. The Complaint does not confer diversity jurisdiction upon federal courts pursuant to 28 U.S.C. § 1332, as the State is not a citizen of any state and this action is not subject to the jurisdictional provision of the Class Action Fairness Act of 2005, 28 U.S.C. § 1332(d). Federal question subject-matter jurisdiction under 29 U.S.C. § 1331 is not invoked by the Complaint. The State does not plead, expressly or implicitly, any cause of action or request any remedy that necessarily arises under federal law.

15. The Chancery Court is authorized to hear this case as a court of general jurisdiction and under the TCPA.

16. This Court has personal jurisdiction over Roblox because of its contacts with Tennessee. As described more fully below, at all relevant times, Roblox purposefully directed its activities towards Tennesseans by operating and making its platform available to Tennesseans; marketing its platform towards Tennessee children and parents; selling "Robux," subscriptions, and other services to Tennesseans; and collecting payments from Tennesseans. The State's claims arise out of and relate to these contacts.

17. Through these efforts, at all relevant times, Roblox has purposefully availed itself

of the benefits and protections of Tennessee law and created substantial connections with Tennessee.

18. Venue is proper in Williamson County pursuant to the TCPA's specific state enforcement venue provision, Tenn. Code Ann. § 47-18-108(a)(4), because Williamson is a county where the alleged violations took place and where Roblox has conducted and transacted business.

PRE-SUIT NOTICE

19. Consistent with Tenn. Code Ann. § 47-18-108(a)(2) and (3), the State certifies that it has provided Roblox with ten days' notice of its intention to initiate suit and an opportunity to respond or present reasons why suit should not be instituted.

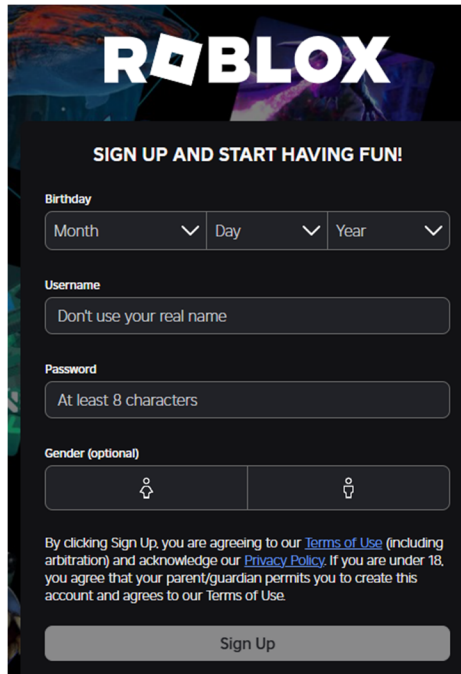
FACTUAL ALLEGATIONS

I. ROBLOX BUILT AND MARKETING ITS PLATFORM AS A CHILD-CENTERED AND FOR USERS UNDER 13.

A. Roblox is a large online gaming platform.

20. Originally launched in 2006, Roblox is an online gaming platform which users access via a mobile app, a website, or a gaming console.

21. The first step to playing Roblox is to create an account. Doing so is extremely simple: all the user has to do is visit www.roblox.com and "SIGN UP AND START HAVING FUN!" To sign up, a user must provide a birthday, username, and password to start playing. There is no minimum age requirement, and Roblox does not verify a user's given age upon signup, making it easy for individuals to misrepresent their actual age. Nor does Roblox require users to provide any contact information, such as a telephone number or e-mail address, for identity verification.

The image shows the Roblox sign-up interface. At the top is the Roblox logo. Below it is the heading "SIGN UP AND START HAVING FUN!". The form includes fields for "Birthday" (Month, Day, Year dropdowns), "Username" (with a placeholder "Don't use your real name"), "Password" (with a placeholder "At least 8 characters"), and "Gender (optional)" (with male and female icons). A disclaimer at the bottom states: "By clicking Sign Up, you are agreeing to our [Terms of Use](#) (including arbitration) and acknowledge our [Privacy Policy](#). If you are under 18, you agree that your parent/guardian permits you to create this account and agrees to our Terms of Use." A "Sign Up" button is at the bottom.

Example of Sign-Up Screen (as of December 9, 2025)

22. Users of any age—including children—therefore, can easily create an account. And although the sign-up screen states that “[i]f you are under 18, you agree that your parent/guardian permits you to create this account and agrees to our Terms of Use,” Roblox does not follow-up or otherwise confirm whether such parental permission has been given. Nor does it require a parent to confirm the age given when a child signs up for Roblox.

23. Because the platform requires no contact information to verify new users’ identities, and conducts no verification whatsoever, adults can effortlessly masquerade as children by entering a false birthdate—and children can just as easily pose as adults.

24. Roblox users act through avatars, which they can customize and use to communicate, chat, or otherwise interact with each other and play games, which Roblox calls “experiences.” There are more than 7 million experiences available to play on the platform.

25. Experiences are created by third party developers who use the infrastructure and code provided and maintained by Roblox. Those developers may upload their experiences to the Roblox platform and self-designate the age groups who have access to the experience.

26. A fundamental aspect of Roblox, therefore, is that individual users play alongside and interact with other individuals from all over the world regardless of whether they know each other or share a similar age group. Indeed, Roblox “operates a human co-experience platform . . . where users interact with each other to explore and develop immersive, user generated, 3D experiences.”³

27. One stated goal of Roblox is “to foster a rich, interconnected network of relationships on Roblox”—as to which it provides “building tools, such as Contact Importer, . . . to make it easy to connect with existing friends—or make new ones, like the millions of new friendships formed on Roblox every day.”⁴ Through Roblox, users can also communicate by chatting with one another in games, direct messaging each other, or interacting with each other’s avatar using gestures like holding hands or hugging. Similarly, Roblox has also released “Roblox Connect”—a feature opened to users age 13 or older—“where you can call a connection and have a conversation as your avatars together in a shared immersive space.”⁵

³ Roblox Corp., Quarterly Report (Form 10-Q), at 15 (May 13, 2021).

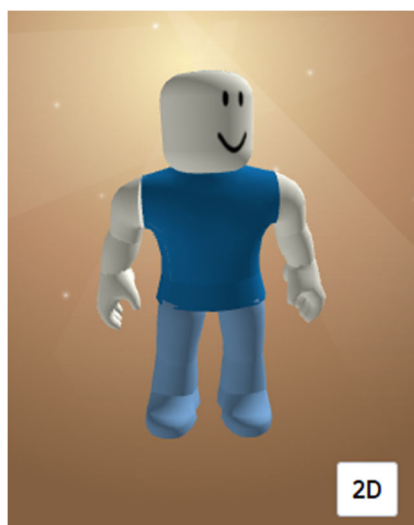
⁴ Bhatia & Stauffer, *Reminaging How People Come Together Through Communication, Connection & Expression*, Roblox (Oct. 19, 2023), available at <https://corp.roblox.com/newsroom/2023/10/reimagining-bringing-people-together-communication-connection-expression> (last visited Dec. 17, 2025).

⁵ Roblox, *Roblox Connect FAQ*, available at <https://en.help.roblox.com/hc/en-us/articles/20918814627988-Roblox-Connect-FAQ> (last visited Dec. 14, 2024).



*Example of “Roblox Connect” which is “a way for friends to call each other as their avatars.”*⁶

28. After creating an account, users are assigned a default avatar—a Lego-like, cartoon character that represents the individual when playing games on Roblox. The avatar is customizable, meaning the user can decide to add hair and change the avatar’s physique.



Example of Default Avatar

29. Users may also customize their avatar by purchasing certain items and upgrades, which require the Roblox currency called “Robux.” Robux are created exclusively by Roblox and

⁶ *Id.*

are available for purchase inside the Roblox app, on the Roblox website, and as gift cards from brick-and-mortar retail stores. Users may also subscribe to receive Robux on a recurring basis with a Roblox Premium membership.

30. Roblox generates substantial revenue from Robux sales. According to Roblox’s Q3 2025 Financial Report, during just that quarter it generated over \$1.9 billion in “bookings,” which represents “the sale activity in a given period without giving effect to certain non-cash adjustments.”⁷ “Substantially all of [Roblox’s] bookings are generated from sales of virtual currency.”⁸

31. Apart from purchasing Robux with real-world currency, users may earn Robux in the marketplace by creating and selling items on the Roblox platform. A user can, for example, create a customized shirt for other players to spend their own Robux to purchase and add to their avatar.⁹ For each sale within the platform, Roblox takes a 30% cut of the Robux, which has cash value.¹⁰ A user can also use the feature “Gift Robux” to “send Robux directly to the Roblox account of [another] person.”¹¹

32. Users who have accrued beyond the “requisite minimum amount” of Robux (as set by Roblox) can “cash out” their Robux for U.S. dollars at a rate of \$0.0035 for every earned

⁷ Roblox, *Q3 2025 Supplemental Materials*, 3 (Oct. 30, 2025), available at https://s27.q4cdn.com/984876518/files/doc_financials/2025/q3/Q3-2025-Supplemental-Materials-FINAL.pdf

⁸ *Id.* at 41.

⁹ Roblox, *Marketplace Fees & Commission*, available at <https://create.roblox.com/docs/marketplace/marketplace-fees-and-commissions#classic-clothing> (last visited Dec. 10, 2025).

¹⁰ Alexander Lee, *Roblox Earnings: Why the platform paid out \$280 million to creators in the last quarter*, Digiday (Feb. 7, 2025), available at <https://digiday.com/media/roblox-earnings-why-the-platform-paid-out-280-million-to-creators-in-the-last-quarter/> (last visited Dec. 10, 2025).

¹¹ Roblox, *Gift Robux*, available at <https://www.roblox.com/gift-robux> (last visited Dec. 14, 2025).

Roblox.¹² Globally, Roblox users earned more than \$1 billion in the 12 months leading up to Q1 2025.¹³

B. Roblox intentionally markets its product to children and for children.

33. Roblox was initially created for children and marketed itself for years as the “#1 gaming site for kids and teens.”¹⁴ Roblox’s appeal to children makes sense—whereas generations of children have imagined scenarios by playing “pretend” on the playground, Roblox allows children to play “pretend” with the benefit of colorful computer-generated environments and a much larger group of potential playmates.

34. Roblox’s silly, colorful avatars and imaginative experiences have been designed to create an initial impression of innocent fun. A parent who casually observes their child play Roblox would perceive it as a generic, kid-friendly game.




35. Although it has now expanded its horizons beyond just children, Roblox intentionally continues to market to young children by holding itself out as an educational

¹² Roblox, Developer Exchange – Help and Information Page, available at <https://en.help.roblox.com/hc/en-us/articles/13061189551124-Developer-Exchange-Help-and-Information-Page> (last visited Dec. 10, 2025).

¹³ Roblox, *Our Economic Footprint*, available at <https://corp.roblox.com/impact> (last visited Dec. 10, 2025).

¹⁴ Roblox, *What Is Roblox*, <http://web.archive.org/web/20170227121323/https://www.roblox.com/> (archived Feb. 27, 2017) (last visited Dec. 9, 2025).

experience for young users. For example, Roblox touts that it provides “new gateways into learning”—ranging 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.”¹⁵ This includes “high-quality, standards-aligned, immersive educational experiences designed by curriculum experts.”¹⁶

A screenshot of the Roblox 'Learners' webpage. On the left, there is a photograph of three students (two girls and one boy) sitting at a desk, looking at a tablet and a laptop. On the right, the word 'Learners' is written in a large, white, sans-serif font. Below it, the text 'Why learn on Roblox?' is followed by a bulleted list of three points: '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.', and 'Expert-backed: Supplement learning with immersive experiences designed by curriculum experts.' At the bottom right of the section is a blue button with the text 'LEARN MORE' in white capital letters.

Example from Roblox Webpage

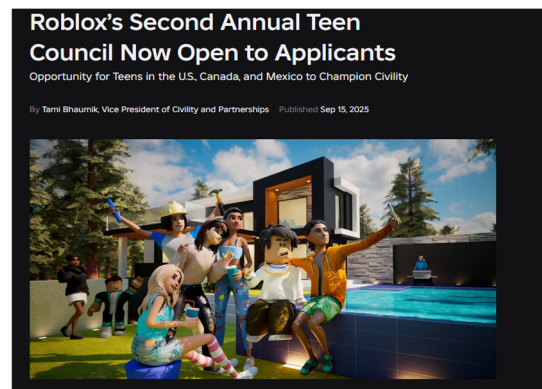
36. Roblox recently announced its “second annual Teen Council”—an “[o]ppportunity for teens in the U.S, Canada and Mexico.”¹⁷ The council, Roblox explains, “is an important part of our ongoing goal of fostering a safe and positive online environment for all of our users, including teens and young adults.” The application is open to “[u]sers age 14 to 17.” By enticing

¹⁵ Roblox, *A New Era of Engaged Learning*, available at <https://corp.roblox.com/education> (last visited Dec. 10, 2025).

¹⁶ *Id.*

¹⁷ Tami Bhaumik, *Roblox’s Second Annual Teen Council Now Open to Applicants*, Roblox (Sep. 15, 2025), <https://corp.roblox.com/newsroom/2025/09/2026-roblox-teen-council> (last visited Dec. 10, 2025).

teens to participate in this program, Roblox encourages—and indeed, welcomes—young users’ continued activity on the platform.

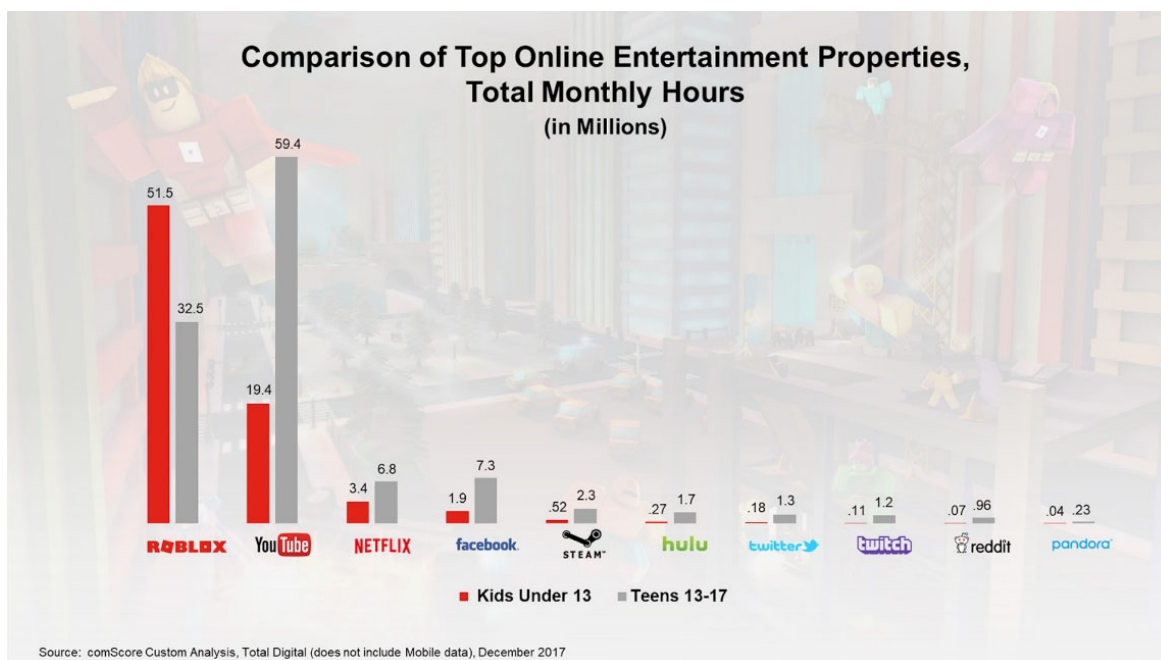


37. Roblox also partners with brands whose primary audience are preschoolers and elementary kids. For example, Mattel officially licensed Roblox to develop a “Barbie Dreamhouse Tycoon” experience; the official “Maturity” rating for this experience is “Ages 5+”.¹⁸ In October 2025, Mattel expanded its collaboration with Roblox to launch specific titles based on other iconic children’s brands, including Monster High, Hot Wheels, and Polly Pocket. These experiences allow children to interact with brand-specific content. Roblox specifically partners with children’s brands to continue to attract young users to its platform.

38. Roblox’s user activity statistics reflect the resounding success of its child-centered marketing scheme. Its platform is heavily dominated by young children under the age of 17. As early as 2017, Roblox announced that it became the “top online entertainment platform for both kids and teens,” far exceeding the monthly visits of its closest competitor, YouTube, among

¹⁸ Roblox, *Barbie DreamHouse Tycoon*, <https://www.roblox.com/games/13166293021/Barbie-DreamHouse-Tycoon> (last visited Dec. 17, 2025).

children under 13.¹⁹ And by 2021, “Roblox host[ed] more students every month than *all* school-going children in the U.S., U.K., and Canada combined.”²⁰



39. In Roblox’s most recent 2024-25 Annual Report, it reported that it had an average of 82.9 million daily users. Of those users, 56% were under the age of 17, 40% were under the age of 13, and 20% were under the age of 9.²¹

¹⁹ Roblox, *Roblox Emerges as a Top Online Entertainment Platform for Kids and Teens in 2017*, Roblox, (Mar. 21, 2018), available at <https://ir.roblox.com/news/news-details/2018/Roblox-Emerges-as-a-Top-Online-Entertainment-Platform-for-Kids-and-Teens-in-2017/default.aspx> (last visited Dec. 10, 2025).

²⁰ Hamza Mudassir, *‘Roblox’ isn’t just a gaming company. It’s also the future of education*, Fast Company (March 29, 2021), available at <https://www.fastcompany.com/90619108/roblox-future-of-education> (last visited Dec. 10, 2025).

²¹ Roblox, *Roblox 2025 Proxy Statement and 2024 Annual Report* 99, Roblox Corp. (May 29, 2025), https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf (last visited Dec. 10, 2025).

C. Through its public statements, Roblox leads consumers to believe that its platform is safe for young users.

40. Roblox’s rapid business growth has relied on its high accessibility to children—which circumvents parental intervention—and its false assurances that its application is safe for children.

41. As a threshold problem, a child of any age can sign up without parental oversight. Roblox does not restrict children’s ability to create accounts without knowledge or consent of their parent or guardian.

42. Before November 2024, parental controls were turned off by default—though their use is specious at best given that many parents are not even made aware that their children are on Roblox. For children under the age of 13, certain experiences designated as mature may require a parent’s permission by email.

43. Once on the platform, a user is immediately able to engage in millions of different experiences and join “communities,” which are groups that allow users to connect with each other outside of experiences.

44. Nevertheless, at nearly every turn, Roblox has emphatically reassured parents that its application is safe. As early as 2007, Roblox represented that it is an “online virtual playground . . . where kids of all ages can *safely* interact, create, have fun, and learn.”²² It admitted that it is “designed for 8 to 18 year olds, but it is open for people of all ages.”

45. Between 2008 and 2016, Roblox doubled down on its promises to parents on its website: “We take every precaution possible to make sure kids are protected from inappropriate

²² Roblox, *Frequently Asked Questions (FAQs)*, available at <https://web.archive.org/web/20071022041355/http://www.roblox.com/Parents/RobloxGuide.aspx> (archived Nov. 5, 2007) (last accessed Dec. 10, 2025).

and offensive individuals as well as from indecent and distasteful content.”²³ It also represented that it moderated content to remove “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.²⁴

46. In 2017, Roblox reaffirmed 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.”²⁵ According to Roblox, it is “a safe, moderated place to meet, play, chat, and collaborate on creative projects.”²⁶

47. Roblox has marketed itself as an “industry leader” in child safety since at least 2021.²⁷

48. Again in 2023, Roblox promised 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.”²⁸ It is “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

²³ Roblox, *Keeping Kids Safe*, available at <https://web.archive.org/web/20080603131744/http://www.roblox.com/Parents/KeepingKidsSafe.aspx> (archived May 1, 2008) (last accessed Dec. 10, 2025), *see also* Roblox, *Information for Parents*, available at <https://web.archive.org/web/20160216011746/http://corp.roblox.com/parents> (archived Jan. 31, 2016) (last visited Dec. 10, 2025).

²⁴ Roblox, *Information for Parents*, available at <https://web.archive.org/web/20160216011746/http://corp.roblox.com/parents> (archived Jan. 31, 2016) (last visited Dec. 10, 2025).

²⁵ Roblox, *Parents’ Guide*, available at <https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/> (archived Jul. 16, 2017) (last visited Dec. 10, 2025).

²⁶ *Id.*

²⁷ Roblox Corp., Q1 2021 Earnings Call (May 11, 2021).

²⁸ Roblox, *For Parents*, available at <https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/> (archived Apr. 5, 2023).

online.”²⁹ And 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.”³⁰

49. To this day, Roblox’s website is chock full of the same assurances. It promises that it “won’t allow language that is used to harass, discriminate, incite violence, threaten others, or used in a sexual context.”³¹ 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 24/7 for inappropriate content”; its “Trust & Safety team takes swift action (usually within minutes) to address any content or behavior that violates [its] Term of Use or Community Standards”; its “safety review of *every* uploaded image, audio, and video file, using a combination of review by a large team of human moderators and machine detection before they become available on our platform”; and its chat filters for inappropriate content, which “are even stricter” for children under 13 and “include any potentially identifiable personal information, slang etc.”³²

50. Nor are these assurances limited to Roblox’s public-facing website. Roblox’s most senior executives—including its CEO—have repeatedly reaffirmed them when confronted with parents’ specific safety concerns.

²⁹ *Id.*

³⁰ Roblox, *Roblox & User Data FAQ*, available at <https://en.help.roblox.com/hc/enus/articles/4406238486676-Roblox-User-Data-FAQ> (last visited Dec. 10, 2025).

³¹ Roblox, *Safety Features: Chat, Privacy & Filtering*, available at <https://en.help.roblox.com/hc/enus/articles/203313120-Safety-Features-Chat-Privacy-Filtering> (last visited Dec. 10, 2025).

³² Roblox, *Safety & Civility at Roblox*, available at <https://en.help.roblox.com/hc/enus/articles/4407444339348-Safety-Civility-at-Roblox> (last visited Dec. 10, 2025).

51. In 2009, when a blogger reported that he blocked Roblox’s platform over concerns for his children, CEO David Baszucki asserted that Roblox flags and removes “obviously offensive content” and “immediately” investigates anything “marginal” reported to it.³³

52. Then, in a 2013 *Wired* interview, CEO Baszucki was asked whether parents should worry about who might be communicating with their children on the platform. He answered by declaring, “We take *every precaution possible* to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content” (emphasis added) — echoing, nearly word-for-word, the assurances the company published on its own parent-information page.³⁴

53. In 2018, Tami Bhaumik, Roblox’s Vice President of Civility & Partnerships, doubled down on these promises and told the Washington Post that Roblox “focus[es] on making sure that everything is done in a safe and appropriate way.”³⁵ In the same year, she also claimed to another newspaper, The Sun, that her “safety team *reviews every* uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate” and boasted that Roblox “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.”³⁶

³³ 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).

³⁴ Tony Sims, *Interview with David Baszucki, Founder & CEO of Roblox*, WIRED (Feb. 7, 2013), available at <https://www.wired.com/2013/02/roblox/> (last visited Dec. 10, 2025).

³⁵ Hayley Tsukayama, *Roblox, an Online Kids Game, Explains How a Hack Allowed a Character’s Virtual ‘Rape’*, WASH. POST. (July 17, 2018), <https://www.washingtonpost.com/technology/2018/07/17/roblox-an-online-kids-game-explains-how-hack-allowed-characters-virtual-rape/>.

³⁶ Chris Pollard, *Danger to Kids Police Warn that Children as Young as Five-Years-Old are Seeing Naked LegoType Characters Having Sex on Roblox App*, The Sun (Jan. 29, 2018), <https://www.thesun.co.uk/news/5445444/roblox-app-children-danger-sex-warning/> (last visited Oct. 3, 2025).

54. In a 2021 interview with Axios, Baszucki again stated that “[e]verything is reviewed by over 2,000 real life humans, in addition to all the cool ML [Machine Learning] and AI [Artificial Intelligence] stuff.”³⁷

55. In a 2022 video interview focused on Roblox’s safety practices, Bhaumik again claimed that Roblox’s “number one priority” is “to create a safe, civil, and inclusive community,” insisting that “[s]afety and civility has always been baked into everything that we do.”³⁸ That same year, Bhaumik appeared on a podcast and touted Roblox’s supposed safeguards, citing “thousands of human moderators on the front lines” and “machine learning that is constantly taking a look at chat filters.”³⁹ With these measures in place, she declared that “[a]ny sort of bad actor that comes onto the platform is dealt with swiftly” and that “[w]e remove any content that’s reported to us within minutes.”⁴⁰

56. In a 2024 blog post published on Roblox’s website, Roblox Chief Safety Officer Kaufman claimed 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.”⁴¹ He further asserted that, “For

³⁷ Ina Fried, *Roblox CEO: Human Reviewers Are Key to Keeping the Metaverse Safe*, AXIOS (Jun. 6, 2021), available at <https://www.axios.com/2021/06/06/roblox-ceo-human-reviewers-metaverse>.

³⁸ 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-howto-help-kids-use-itsafelyroblox-vp-of-digital-civilitypartnerships/1338989609901259/> (last visited Dec. 10, 2025)

³⁹ Into the Metaverse, *Ep. 21: Tami Bhaumik (Roblox) – Building a Safe & Resilient Metaverse*, at 00:36:35-00:37:08 YouTube (Sep. 13, 2022), https://www.youtube.com/watch?v=LT5_bBOYS9A.

⁴⁰ *Id.*

⁴¹ Matt Kaufman, *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>.

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, Kaufman reiterated that “[s]afety is and always has been foundational to everything we do at Roblox.”⁴²

57. In a subsequent blog post, Kaufman went even further, praising what he characterized as Roblox’s “track record of putting the safety of the youngest and most vulnerable people on our platform first.”⁴³

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

59. In July 2025, CEO Baszucki repeated many of these claims in a nationally televised interview. When asked directly about the severity of Roblox’s pedophile problem, Baszucki sidestepped the question, insisting that “since day one safety’s really been our top priority, and we’ve been innovating since day one on safety and civility.”⁴⁵ Baszucki repeated that soundbite when pressed on questions like the size of Roblox’s pedophile problem and what he would say to a parent who chooses not to have their kid on Roblox. According to Baszucki, “on Roblox since

⁴² Matt Kaufman, *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>.

⁴³ 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>.

⁴⁴ Maressa Brown, *Is Roblox Safe for Kids? Here’s What the Experts Have to Say*, *Parents Magazine* (Apr. 29, 2024), <https://www.parents.com/kids/safety/internet/is-roblox-safe-for-kids/>.

⁴⁵ Morning Joe, *Roblox CEO lobbies Congress on child safety as platform faces scrutiny: ‘Safety is our top priority’* at 00:01:40–00:01:47, MSNBC (July 25, 2025), <https://www.msnbc.com/morning-joe/watch/roblox-ceolobbies-congress-on-child-safety-as-platform-faces-scrutiny-safety-is-our-top-priority-243701829644> (last visited Dec. 10, 2025).

day one we've filtered all of the communication.”⁴⁶ When asked about reports from the National Center for Missing & Exploited Children (“NCMEC”) and Bloomberg that document safety concerns, Baszucki claimed that “safety has always been our top priority” and the “technology we’ve been using since day one is very extensive.”

60. While attempting to portray Roblox as safer than other social media platforms, Baszucki further asserted that Roblox does not permit the sharing of personal information such as phone numbers, despite the fact that such exchanges are widespread and Roblox’s filters are routinely bypassed. Indeed, while Roblox’s filter may block certain words like “Snap” and “Snapchat” to supposedly prevent off-app communications, it allows workarounds such as the use of the ghost emoji (👻), which is widely recognized as a symbol for Snapchat, or alternative spellings, like “Snappy” or “apchat.” Similarly, while the word “Discord” is blocked, users can bypass this filter by using the disc emoji (🎮) or typing variations, like “cord.”

61. Most recently, in November 2025, during an interview with the New York Times, CEO Baszucki expressly acknowledged the “enormous responsibility” Roblox bears “to design not for the sophisticated parent who goes in and says, ‘Look, I’m going to turn off who you can chat to and all of that.’ We have to design for all parents and think through that.”⁴⁷ “[T]he problem of predators on Roblox,” he said, was not really a problem “but an opportunity.”⁴⁸ When pressed about age verification and related safety issues, Baszucki responded impudently: “I thought we were going to be talking about fun, funny things in the industry and all that” and admonished his

⁴⁶ *Id.*

⁴⁷ Kevin Rose, Casey Newton, and Rachel Cohn, *We Asked Roblox’s C.E.O. About Child Safety, It Got Tense*, THE NEW YORK TIMES (Nov. 21, 2025), available at <https://www.nytimes.com/2025/11/21/podcasts/hardfork-roblox-child-safety.html>.

⁴⁸ *Id.*

interviewers’ “superfocus” on child safety issues.⁴⁹ Despite all its flaws, when asked whether the platform will be safer by the time the reporter’s three-and-a-half-year-old child reaches five or six years old, Baszucki doubled down: “Roblox is an amazing platform right now for your kid.”⁵⁰

62. In another recent interview, Roblox’s Senior Director of Product Policy, Eliza Jacobs, said, without identifying any specifics, Roblox uses a “safe by default strategy” for parental controls.⁵¹ “The most important thing,” she said, is that children “are signing up with the right age.”⁵² And when asked about Roblox’s responsibility for harm to children on the platform, she admitted “[e]ven one of these cases is too many.”⁵³

II. ROBLOX’S DIGITAL PLAYGROUND DOUBLES AS A CHILD PREDATOR’S HUNTING GROUND.

63. Roblox’s public statements and promises are carefully curated to create the impression that Roblox’s “digital playground” is “family friendly” and thus safe and appropriate for children. This campaign of reassurance conceals a far harsher reality. Rather than creating a safe space for children, Roblox designed, built, and continues to operate as an environment where predators can readily hunt, groom, and sexually exploit minors, both on and off its platform. What Roblox markets as a child-friendly platform is, in truth, a profoundly dangerous one.

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Only on WRAL: Roblox Official Answers Questions About Safety on the App*, WRAL (Nov. 13, 2025), <https://www.wral.com/news/investigates/roblox-official-safety-questions-answered-nov-2025/>

⁵² *Id.*

⁵³ *Id.*

- A. Despite assuring parents that its platform was safe for children and free of sexual content, Roblox knowingly designed and operated a platform that allowed cesspool of inappropriate content to flourish within children’s reach, harming Tennessee children.**

64. As early as 2010, sexual content proliferated among Roblox’s virtual games. Roblox’s scripting language, which allows users and developers to manipulate their avatar activity however they want, permitted users to engage in deplorable conduct. For example, children could play experiences called “condo games”—predatory digital environments, including houses, where users can remove their avatars’ virtual clothing, reveal nudity, and engage in simulated sexual activities with other Roblox users.⁵⁴ They could also partake in virtual strip club experiences, where avatars can perform or receive sexually explicit acts, like lap dances.



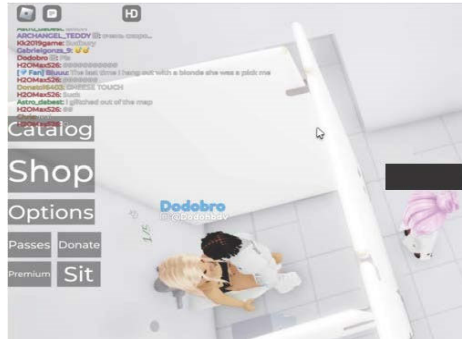
Example of Strip Club “Experience”⁵⁵

65. Children could also play games like “Public Bathroom Simulator Vibe,”—a game open to children as young as 9 years old—that allows users to simulate sexual activity and make

⁵⁴ 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>

⁵⁵ 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>

sexual noises in virtual bathroom stalls.⁵⁶



Example of “Public Bathroom Simulator” Experience⁵⁷

66. The examples aren't just sexual in nature. A slew of other games, involving racism, extreme and distasteful violence, and other extremely uncouth conduct were open to users of "all ages," and thus accessible by children. For example, a classroom within an innocuously named Roblox "school" simulator game had the phrase "kill n***** babies with a knife," written on a chalkboard.⁵⁸

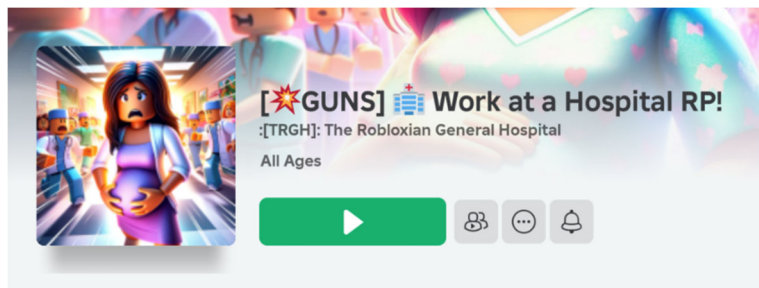
⁵⁶ Hindenburg Research, *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, Hindenburg Research (Oct. 8, 2024), <https://hindenburgresearch.com/roblox/>.

⁵⁷ *Id.*

⁵⁸ *Id.*



67. Another experience called “Work at a Hospital RP,” open to all users and available for months before it was taken down, invited users to pay Robux to purchase a wide range of virtual assault rifles to shoot hospital workers and visitors. The thumbnail advertising the game featured a terrified pregnant woman in a hospital:⁵⁹



68. A recent investigative report uncovered a wide array of exploitative Roblox experiences that trivialize—and even gamify—serious criminal conduct, including rape.⁶⁰ The investigation confirmed that Roblox was actively hosting more than 600 so-called “Diddy” games, with titles such as “Survive Diddy,” “Run from Diddy Simulator,” and “Diddy Party,” which

⁵⁹ *Id.*

⁶⁰ *Id.*

appear to reenact publicly alleged incidents of sexual abuse involving the music mogul Sean Combs, known as “Diddy.”

69. The report further revealed that Roblox permitted more than 900 accounts using variations of convicted sex trafficker Jeffrey Epstein’s name—including accounts such as “JeffEpsteinSupporter”—and allowed these accounts to participate openly in children’s games. Roblox also hosted experiences with titles such as “Escape to Epstein Island,” a direct reference to one of the locations where Epstein trafficked minors and other non-consenting individuals for sexual and physical abuse.⁶¹

B. Roblox’s platform of unrestricted avatars and unsupervised conduct cleared a pathway for child-sex predator grooming.

70. Roblox’s design and features function not only as a platform for harmful content, but as a gateway for predators seeking out children and an environment tailor-made for grooming. Non-profit groups fighting child exploitation warn that Roblox “is being used as a first point of contact for predators.”⁶²

71. Children are inherently trusting and may not realize that many avatars are controlled by adults—particularly when those adults can approach them easily and misrepresent their age. Roblox hands predators direct access to tens of millions of children and the ability to roam seamlessly into popular experiences to locate and target young users. That system is no accident—it demonstrates Roblox’s reckless disregard for its public promises to provide a safe online environment for children.

⁶¹ *Id.*

⁶² 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>.

72. The rampant exploitation on Roblox follows a grooming playbook the company has known about for years. Predators masquerade as children, gain the trust of an underage user, and then funnel the child off Roblox to another platform such as Snapchat or Discord where the predator can escalate the abuse out of public view.

73. Predators then typically escalate to soliciting nude photos or sexually explicit videos—core acts of child exploitation. That final step may take place off Roblox, but Roblox is what enables it. By granting predators direct access to children and failing to implement basic protections, Roblox supplies the conditions for predators to identify, groom, and exploit young victims.

74. As a recent Bloomberg Businessweek article titled *Roblox's Pedophile Problem* stated, “These 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.”⁶³

75. Media outlets have repeatedly sounded the alarm that Roblox “is being used as a first point of contact for predators.”⁶⁴ Children, whose developing brains make them especially trusting and unaware of online threats, frequently fail to see the danger in sharing their usernames or moving conversations to other sites.

⁶³ Olivia Carville & Cecilia D’Anastasio, *Roblox's Pedophile Problem*, Bloomberg Businessweek (Jul. 23, 2024), available at <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/>.

⁶⁴ National Center on Sexual Exploitation, *The Dirty Dozen List '24: Roblox*, available at <https://endsexualexploitation.org/roblox/> (last updated Dec. 4, 2024).

76. NCMEC has reported that “[v]iolent groups are targeting kids on publicly available platforms, including Discord, Roblox, and other gaming sites.”⁶⁵ “Initially offenders befriend them and initiate an online relationship, then force their young targets to record or live stream acts of harm against themselves and others.” For example, “[o]ne mother told NCMEC a violent group member made her daughter cut its screen name into her arm with a razor blade, then told her she was a good girl and that they love her. Her mother couldn’t believe her daughter’s response: ‘I love you, too.’” One CyberTipline report was directly related to Roblox: “the suspect offered money or other types of currency in exchange for [child sexual abuse material]: ‘Basically, it all started out with him asking her to send him stuff in return for Robux, the digital currency on Roblox. It escalated into him asking her to cut herself, with him even saying, ‘The deeper the more you earn.’”⁶⁶

77. Roblox’s own business model fuels exploitation. Its virtual currency system gives predators a ready-made bargaining chip—Robux—which becomes both the bait and the weapon. Predators offer Robux to entice children to provide explicit images. Predators also extort additional Robux by threatening to expose those images previously provided by the children. Both methods directly connect Roblox’s revenue stream to the sexual exploitation of minors. In essence, Robux itself has become the currency of child exploitation.

78. This exploitation works because of Roblox’s reward structure. Children become obsessed with purchasing or obtaining Robux to buy items for their avatar and to spend on their

⁶⁵ Patricia Davis, *Spike in Online Crimes Against Children, A Wake Up Call*, Missing Kids (Sept. 4, 2025), available at <https://www.missingkids.org/blog/2025/using-sextortion-to-groom-kids-for-violence-pain> (last visited Dec. 14, 2025).

⁶⁶ Patricia Davis, *Spike in online crimes against children a “wake-up call”*, Missing Kids (Sep. 4, 2025), available at <https://www.missingkids.org/blog/2025/spike-in-online-crimes-against-children-a-wake-up-call> (last visited Dec. 14, 2025); *Using Sextortion to Groom Kids for Violence, Pain*, Missing Kids (Aug. 28, 2025), available at <https://www.missingkids.org/blog/2025/using-sextortion-to-groom-kids-for-violence-pain> (last visited Dec. 14, 2025).

favorite experiences on the platform. At the “Avatar Store,” for example, Roblox sells “rare” items, such as a type of hair for an avatar, which children often seek to purchase to keep up with or outdo their peers. As a result, children often tell others, including strangers, that they will do “[a]nything for Robux.”⁶⁷ Given this incentive structure, predators can easily pull children’s psychological levers to force compliance.

79. Roblox knows exactly how its platform is being weaponized to exploit children, but it has refused to implement any guardrails to ensure the Robux are part of a legitimate in-game transaction. Instead, it profits directly from the Robux transactions predators use to coerce and extort minors. That decision lays bare Roblox’s reckless indifference and its willingness to put profits ahead of the basic safety of the children on its platform.

80. Whether grooming begins with a simple “be my boyfriend/girlfriend” message or something more elaborate, predators often escalate toward seeking real-world access to the child. That leap from Roblox’s digital world to offline violence highlights the catastrophic consequences of its product design. Roblox’s platform equips predators to progress from casual online contact to arranging in-person meetings—encounters that have resulted in harassment, kidnapping, trafficking, physical violence, and sexual assault of minors, all directly enabled by Roblox.

81. Roblox is well aware that its platform is used as the first step for predators to make contact with children, including Tennessee children. In 2019, federal prosecutors charged a 31-year-old man, Bryan Rogers, for driving to Tennessee to pick up an underage girl for sexual purposes. The man first communicated with the girl on Roblox.⁶⁸ And, in February 2025, a

⁶⁷ Carville & D’Anastasio, *supra* n.63.

⁶⁸ *Feds: Wisconsin Man Met Tennessee Teen Playing ‘Roblox’ Before Picking Her Up From Home*, WKYT (Feb. 4, 2019), available at <https://www.wkyt.com/content/news/prosecutors-Wisconsin-man-used-Roblox-game-to-505330101.html>

Shelbyville man was arrested and charged with soliciting a relationship with a juvenile and distributing child sexual abuse material through online games, including Roblox.⁶⁹

82. Similar incidents have been reported in many other states. 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.⁷⁰ 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.⁷¹ A Delaware man was recently sentenced to 20 years in prison for coercion and enticement of a minor he communicated with via Roblox.⁷²

83. Roblox has also been used by sadistic child exploitation groups, like the “764,” to find and groom vulnerable children before coercing them into producing explicit sexual and self-harm material.⁷³ For example, one man from Maryland with alleged ties to 764 has been charged

⁶⁹ *TBI Arrests, Charges Shelbyville Man in Ongoing Child Exploitation Case*, TBI (Feb. 6, 2025), available at <https://tbinewsroom.com/2025/02/06/tbi-arrests-charges-shelbyville-man-in-ongoing-child-exploitation-case/>.

⁷⁰ *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/usaomd/pr/silver-spring-man-pleads-guilty-sex-tortion-more-100-minors-located-throughout-united>.

⁷¹ *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>.

⁷² *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/usaode/pr/delaware-man-sentenced-240-months-coercing-11-year-old-new-jersey-resident-trave>

⁷³ 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-exploitationenterprise>.

for “using the online gaming platform Roblox to target young girls, first befriending them, then blackmailing them into recording sexual acts, among other explicit and violent content.”⁷⁴ “According to federal investigators, he pressured girls into cutting themselves and writing messages in blood on the wall.”⁷⁵

84. Parents of children harmed by predators on Roblox have also sued for civil damages. An Iowa family recently sued Roblox, after their 13-year-old daughter was kidnapped, trafficked, and sexually abused by a 37-year-old man in Tennessee whom she met on Roblox.⁷⁶ Dozens of similar lawsuits have been filed against Roblox.

C. Roblox’s flawed design choices and features facilitate a pattern of predation on its platform.

85. The pattern of predation was made possible by Roblox’s design choices and its concomitant failure (and refusal) to implement basic measures that would protect children. Taken together, these shortcomings created a product that falls short of reasonable and industry-standard safeguards.

86. Prior to 2024, when a user under the age of 13 created an account, the default setting was for parental protections to be turned off. If any child listed his or her age as 13 or older, then any “experience” was available to that child.

87. This default setting for Roblox allowed adults to easily communicate with children. Users of any age could “friend” one another, chat with them, private message them, and invite the

⁷⁴ Rebecca Pryor, *FBI Probes Maryland Cases Tied to 764 Extremist Group, Warns of Online Dangers for Kids*, Fox 5 News (Nov. 21, 2025), available at <https://foxbaltimore.com/news/local/fbi-maryland-cases-64-extremist-network-online-dangers-kids> (last visited Dec. 14, 2025).

⁷⁵ *Id.*

⁷⁶ *Iowa Family Sues Roblox, Alleging Gaming Platform Enables Child Sexual Exploitation After Kidnapped Child Found in Jefferson County*, 10 NEWS (Oct. 6, 2025), available at <https://www.wbir.com/article/news/crime/iowa-family-sues-roblox-enables-child-sexual-exploitation-a-kidnapped-child-found-jefferson-county/51-e93a171f-c1a3-426f-a231-8e32cb9bdc2d>.

child to a private server or other “experiences” on the platform. While in the experience, those users could chat with each other, irrespective of whether they were friends. In other words, the option to disable chat with strangers in experiences was turned off by default.

88. One core design flaw is Roblox’s refusal to require age-appropriate designations for the millions of third-party experiences on its platform. Rather than invest the resources needed to vet those experiences—or risk slowing growth by excluding children from inappropriate content—Roblox relied on its adult users to self-regulate underage access to experiences. That deliberate indifference allows inappropriate experiences to proliferate (contrary to Roblox’s representations to parents and the public), all in service of higher profits.

89. Roblox deliberately designed its platform to allow developers to self-assign an “All Ages (Suitable to everyone)” rating with little to no oversight, effectively opening the door for children to enter experiences that are anything but age appropriate. Consequently, even that category is saturated with sexualized conduct, including players mimicking sexual acts and using avatars adorned with sexualized items. With most experiences labeled “Suitable to everyone,” Roblox’s age-restriction system collapses into empty rhetoric, far from “tak[ing] *every precaution possible* to make sure kids are protected . . . from indecent and distasteful content.”

90. Roblox also allows users to manipulate their avatars’ activity and interactions in any way they want. This leads to scenarios where avatars engage in simulated sexual activity.⁷⁷ For years, there have been reports of children’s avatars’ experiences simulated sexual assault by

⁷⁷ *How to Do Roblox Sex Glitch*, YouTube (Sep. 24, 2010), available at https://www.youtube.com/watch?v=Zz97Q1SQE_k; see also *Roblox Sex?* YouTube (Jul. 17, 2011), available at <https://www.youtube.com/watch?v=hyqCHG6nUYI>.

other users' avatars. In 2018, a mother watched the simulated rape of her seven-year-old girl's avatar by two male avatars.⁷⁸

91. Internal documents show that Roblox configured its filters platform in a way that allowed sexualized content to proliferate. For example, Roblox debated internally “[h]ow big of a ‘bulge’” was acceptable, and whether new clothing systems would allow avatars to appear naked.⁷⁹ These internal decisions make clear that Roblox understood exactly what kind of content was proliferating on its platform. And by deliberately choosing not to shut it down, Roblox knew that sexualized experiences would continue to spread unchecked.

92. Despite known harms and risks on its platform, Roblox misrepresents its platform's safety in the “app stores” where it is available for download, claiming it is suitable for individuals “12+”. For example, to be displayed in Apple's App Store, Apple required Roblox to submit an application and self-report details about the content and capabilities of the platform, including whether it is appropriate for children. The App Store required Roblox to report information on certain content categories—“Alcohol, Tobacco, or Drug Use or References,” “Sexual Content or Nudity,” “Mature/Suggestive Themes,” and “Profanity or Crude Humor.”⁸⁰ For each category, Roblox must report the level of frequency—“none,” “infrequent/mild”, and “frequent/intense.” Apple defines a “12+” rating for apps that may contain “infrequent mild language” or “mild or infrequent mature or suggestive themes.” In the Apple App Store, Roblox's “12+” rating discloses that users may experience “infrequent/mild horror/fear themes,” “infrequent/mild realistic

⁷⁸ Savannah Levins, *North Carolina Mom Outraged After Roblox Game Depicts Violent Acts, Including Rape*, WCNC CHARLOTTE (June 30, 2018), available at <https://www.wcnc.com/article/news/local/north-carolinamom-outraged-after-roblox-game-depicts-violent-acts-including-rape/275-569365001>.

⁷⁹ Joseph Cox & Emanuel Maiberg, *Leaked Documents Reveal How Roblox Handles Grooming and Mass Shooting Simulators*, VICE (Aug. 1, 2022), available at <https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-contentmass-shootings-grooming/>

⁸⁰ *Get Started: Age Ratings*, Apple, available at <https://apple.co/3ydIBeh> (last visited Dec. 14, 2025).

violence,” and “frequent/intense cartoon or fantasy violence.” One such game on the App Store that carries this rating is the popular farming simulator game *Stardew Valley*. Roblox does not warn about “Sexual Content or Nudity,” “Mature/Suggestive Themes,” and “Profanity or Crude Humor,” which means Roblox reported that the level of frequency for these categories is “none”—a flagrant misrepresentation, given Roblox’s knowledge of how frequently sexual content, nudity, and mature and suggestive themes proliferate on the platform.⁸¹

93. By contrast, a game like “Block Blast”—essentially a modern version of Tetris—is designated as “12+” on the Apple App Store because users may experience “infrequent/mild simulated gambling.”⁸² Even though the game appears completely innocuous, it also discloses that users may view “infrequent sexual content” due to the *potential* of its in-game advertisements containing such content. If a Tetris-like game with some potentially sexual advertisements must disclose that to Apple, then so should Roblox.

94. Roblox must also make similar disclosures to be available on Google’s “Google Play” Store. Roblox reported its platform as “T” for “Teen,” which 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.”⁸³ An “M” for “Mature” rating however is defined as “generally suitable for ages 17 and up. May contain intense violence, blood and gore, sexual content and/or strong language.” Based on these definitions,

⁸¹ Roblox, App Store, *available at* <https://apple.co/3SQAIf> (last visited Dec. 14, 2025).

⁸² *Brick Blast*, Apple App Store, *available at* <https://apps.apple.com/us/app/block-blast/id1617391485#information> (last visited Dec. 17, 2025).

⁸³ *Apps & Games Content Ratings on Google Play*, Google Play, https://support.google.com/googleplay/answer/6209544?visit_id=638957039552556870-3865757&p=appgame_ratings&rd=1#zippy=%2Cnorth-south-america (last visited Dec. 14, 2025).

Roblox misrepresents its platform—which it knows contains frequent sexual content, nudity, and intense violence, making it suitable for the higher “M” for “Mature Rating.”

D. Roblox’s failure to implement adequate safety measures, which, contrary to its assurances, places Tennessee children directly in harm’s way.

95. Adding fuel to the fire, despite its promises, Roblox did little to protect children from these horrific situations that it enabled. Most glaringly, the ease of account creation and failure to verify ages or parental consent, no matter how young the self-identified user, permit Roblox to amass as many child users as possible, while also enabling predators to create deceptive accounts with impunity.

96. **Verification.** Roblox could easily require its users to verify their age, along with proper parental consent, but opts not to. Doing so would create at least some restriction on the content available to users under 18 years old. At the very least, it would be a step towards preventing predators from easily misrepresenting *their* age, which is often their approach in targeting and grooming children. As one father told the press, “There is nothing to stop adults going on there and pretending they’re kids.”⁸⁴

97. The FTC has explicitly outlined several acceptable methods for obtaining verifiable parental consent. These include: (a) providing a form for parents to sign and return; (b) requiring the use of a credit card or online payment that notifies parents of each transaction; (c) connecting parents to trained personnel via video conference; (d) offering a staffed toll-free number for parental verification; (e) asking knowledge-based questions to confirm identity; and (f) verifying a parent’s photo-ID by comparing it to a second photo using facial recognition technology.⁸⁵

⁸⁴ Carl Stroud, *Horried Dad Found Sick Messages from Paedo Predator in His Eight-Year Old Son’s Roblox iPad Game*, The Sun (Feb. 15, 2017), <https://www.thesun.co.uk/news/2872376/horried-dad-found-sick-messagesfrompaedo-predator-in-his-eight-year-old-sons-roblox-ipad-game/> (last visited Dec. 10, 2025).

⁸⁵ *Id.*

98. Other platforms have successfully developed and/or implemented these precautions. For example, on YouTube Kids, only “signed in parents” can create profiles for their kids using their Google account. Parents must set the “viewing preferences and recommendations” for each child’s profile based on three content settings—“Preschool” (ages 4 and under), “Younger” (ages 5-8), or “Older” (ages 9-12). Minecraft, which is owned by Microsoft, informs users under the age of 13 who try to register that “a parent or guardian is needed to finish the account set up.”

99. In other words, instead of implementing safeguards, Roblox chose to bypass these protections altogether. Roblox deliberately avoids requesting a name or email address during sign-up to sidestep the requirement of verifiable parental consent, despite knowing that users as young as five years old (which is the youngest age that can be selected upon creating an account) are registering on the platform. As a result, a child can create a Roblox account in less than sixty seconds and with no meaningful oversight. Roblox chose to make the account creation process easy, a choice that prioritizes growth over the safety of its youngest users.

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

101. Despite knowing that predators routinely operate dozens of Roblox accounts simultaneously, Roblox has declined to implement even basic blocks on digital identifiers—such as Internet Protocol (IP) addresses or device-specific Media Access Control (MAC) addresses—that could prevent the creation of multiple accounts. As a result, predators who are identified and

banned can simply move to another existing account or create a new one and re-enter the platform (contrary to Roblox’s claim that infringing members are “permanently expelled”).

102. **Parental Controls.** While Roblox has parental controls, as explained above, they are not operative *unless* their parent is associated with their child’s account. Even if parents were to learn about their children’s Roblox accounts and used those controls in place, it would be impossible to adequately monitor—let alone police—activity affecting their child on the Roblox platform.

103. Until November 2024, nothing stopped an adult on Roblox from reaching out to a child—whether by friending them, messaging them directly, or chatting with them inside an experience without any existing relationship. Roblox touted parental controls for younger users, but kids could wipe those away by creating a second account and asserting they were thirteen or older. The platform’s architecture thus deprived parents of meaningful tools to stop adult strangers from accessing their children.

104. While Roblox introduced some measures in November 2024, parents still cannot approve experiences before their children play them. As explained, content ratings on Roblox are self-reported by developers, so letting children play those experiences requires trust in those developers to label their experiences. And currently children may communicate with anyone else on those experiences, regardless of the users’ ages.

105. **Chat Filters.** Roblox’s chat filter feature is easily circumvented. It is supposedly designed to filter inappropriate content and personal information on accounts aged 12 and younger but is less restrictive for accounts aged 13 and above. These filters are ineffective. For example, in 2024, a Chilean man was able to circumvent Roblox’s chat filters to lure a 13-year-old victim to

other platforms.⁸⁶ Roblox publicly characterizes these situations as confirmation of its filtration systems' efficacy. In truth, the recurring nature of these breakdowns reflects the opposite conclusion: the company's measures regularly fail to protect minors despite Roblox's repeated public assurances regarding their supposed effectiveness.

106. Roblox's own developer forums are filled with complaints from the creators whose games generate much of the company's revenue.⁸⁷ Developers report that circumventing Roblox's chat filters is trivial—typing characters with “<” inserted between letters or using certain Roblox-supplied fonts allows messages to pass through unchecked. Others note that replacing letters with Roblox's “letter emojis” creates the same result. Many of these creators describe the issue as “serious” and express confusion about why Roblox has not addressed it.

107. Roblox's approach to chat is out of step with other gaming services, like Nintendo, which use preprogrammed dialogue options to control user interactions.⁸⁸ Had Roblox implemented comparable protections, it could have sharply curtailed—if not entirely prevented—the grooming and abuse occurring on its platform, as predators would have been unable to request personal information or send coercive or sexually suggestive messages to minors.

108. Adding insult to injury, Roblox further endangered children by introducing “Roblox Connect” (voice calls) in November 2023. As explained *supra*, this virtual call feature

⁸⁶ Grace Toohey, *Chilean Man Groomed 13-Year-Old Girl on Roblox Before Flying to U.S. to Meet Her*, *Police Say*, L.A. TIMES (April 22, 2024), available at <https://www.aol.com/news/chilean-man-groomed-13-old-193620082.html> (last visited Dec. 10, 2025).

⁸⁷ *Uh, Roblox? Theres a Way to 100% PERFECTLY Bypass the Chat Filter. Something Needs to be Done*, Roblox DevForum, available at <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 Dec. 10, 2025).

⁸⁸ Carville & D'Anastasio, *supra* n.63.

allows users to have a conversation through their avatars in real time while playing an experience. 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.”⁸⁹ Users age 13 or older may access it.⁹⁰

109. ***Failure to Warn.*** Roblox also fails to warn its users of any risk. Roblox knows how its platform is being used. Reports and investigations concerning sexual abuse of minors through Roblox are numerous. In May 2025, a 40-year-old man was arrested in New York because he “utilized Roblox, an online gaming platform, to connect with . . . alleged 11- and 13-year-old girls on Facebook.”⁹¹ In April 2025, a man was arrested “after contacting a minor male victim on Roblox and later exchange[ed] sexually explicit photos.”⁹² In February 2025, a 25-year-old man was arrested after he “offered [an] 8-year-old boy and his younger brother ‘Robux’ – an in-game currency for the popular children’s video game ‘Roblox’ – to perform sex acts for him via computer.”⁹³

⁸⁹ 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>

⁹⁰ Roblox, *Roblox Connect FAQ*, available at <https://en.help.roblox.com/hc/en-us/articles/20918814627988-Roblox-Connect-FAQ> (last visited Dec. 14, 2025).

⁹¹ *Fairport Man Who Used Roblox to Attempt to Communicate with Minors for Sex Arrested*, U.S. Attorney’s Office, Western District of New York (May 6, 2025), available at <https://www.justice.gov/usao-wdny/pr/fairport-man-who-used-roblox-attempt-communicate-minors-sex-arrested>

⁹² *FBI Cincinnati Announces Arrests as Part of Nationwide Operation Restore Justice*, Federal Bureau of Investigation (May 7, 2025), available at <https://www.fbi.gov/contact-us/field-offices/cincinnati/news/fbi-cincinnati-announces-arrests-as-part-of-nationwide-operation-restore-justice>

⁹³ Anthony Talcott, *Orange County Middle School Employee Accused of Disturbing Sex Chats with Children Online*, *Investigators Say*, News6 (Feb. 5, 2025), available at <https://www.clickorlando.com/news/local/2025/02/06/fell-into-temptation-orlando-man-accused-of-disturbing-sex-chats-with-children-online/>

110. Reports of similar misconduct have been an ongoing theme for years. In May 2023, the National Center on Sexual Exploitation (“NCOSE”) wrote to CEO Baszucki, pointing out that “[c]hild sexual abuse and grooming have long been a threat on Roblox” and cataloguing another 10 examples of sexual abuse cases that tie back to Roblox.⁹⁴

111. An easy-to-implement feature that would have improved safety is adding pop-up safety notices within chats and games to warn users about the dangerous behavior of others. But Roblox’s executives also rejected this change.⁹⁵

112. This failure also manifests in Roblox’s inadequate age-based content labels for experiences. Simply because an experience is labeled for an intended audience means nothing without proactive confirmation as to the accuracy of that label. For example, one experience called “Dollhouse Roleplay” appears entirely innocuous, but users were instead exposed to 764, a Nihilist Violent Extremist group, that is devoted to the sexual exploitation of children.⁹⁶ Put plainly, Roblox’s labels—“Minimal,” “Mild,” “Moderate,” or “Restricted”—are useless. A genuine warning could actually deter harmful behavior and, at minimum, would be the first real step Roblox has taken to address the danger it knows exists.

113. Likewise, when dealing with Google, Apple, and other platforms that make Roblox available for download, Roblox misrepresents to these platforms that it is a platform suitable for

⁹⁴ Letter to David Baszucki from Patrick Trueman and David Hawkins (May 1, 2023), available at https://endsexualexploitation.org/wp-content/uploads/Roblox-Notification-Letter_DDL-2023_FINAL.pdf

⁹⁵ Carville & D’Anastasio, *supra* n.63.

⁹⁶ See, e.g., r/roblox, REDDIT (Aug. 2025), https://www.reddit.com/r/roblox/comments/1ms21ku/they_already_put_it_back_this_is_disgusting/ (last visited Nov. 4, 2025) (describing “Dollhouse Roleplay” experience known to be used by sexual exploitation ring 764 to groom minors); see also Ali Winston, *There Are Dark Corners of the Internet. Then There’s 764*, WIRED (Mar. 13, 2024), <https://www.wired.com/story/764-com-child-predator-network/> (last visited Dec. 10, 2025).

children “ages 12 or older” and has no sexually explicit content. These false disclosures mislead users about the dangerous behavior on the platform and the inappropriate conduct that proliferates.

114. ***Inadequate Moderation.*** Despite representing that “[e]verything is reviewed,” Roblox employs an inadequate number of human moderators to analyze and manage content on the Roblox platform that is generated from having over 150 million active users. With only about 3,000 moderators, Roblox’s moderator staffing pales in comparison to platforms like TikTok, which, despite having only three times the number of users, employs more than ten times the number of moderators, at 40,000.⁹⁷ Roblox attempts to justify this difference by claiming “[y]ou really can’t judge the quality of these moderation systems by the number of people.”⁹⁸ But facts tell another story. Roblox’s moderation workforce—much of it contracted overseas—describes being buried under an avalanche of child-safety reports, unable to triage the flood, and forced to leave a staggering number of threats unaddressed.⁹⁹

115. Moderation is so weak that experiences that have been removed may be reuploaded almost immediately from a new account, perpetuating the cycle of explicit and harmful content.

116. External groups have capitalized on Roblox’s weak moderation by guiding predators to these reuploaded experiences. An investigation identified 150 Discord groups dedicated to exploiting Roblox’s lack of enforcement.¹⁰⁰

⁹⁷ Carville & D’Anastasio, *supra* n.63.

⁹⁸ Scott Tong & James Perkins Mastromarino, *Roblox chief safety officer on new safety features, past cases of child abuse on the platform*, WBUR (Nov. 18, 2024), <https://www.wbur.org/hereandnow/2024/11/18/roblox-safetyfeatures> (last visited Dec. 10, 2025).

⁹⁹ Carville & D’Anastasio, *supra* n.63.

¹⁰⁰ Burt Helm, *Sex, Lies and Video Games: Inside Roblox’s War on Porn*, Fast Company (Aug. 19, 2020), <https://www.fastcompany.com/90539906/sex-lies-and-video-games-inside-roblox-war-on-porn>.

117. Even Roblox’s internal “safety metrics” are misleading and ultimately highlight the escalating risks on Roblox. They boast that reports to the NCMEC involving Roblox make up less than 0.04% of NCMEC’s total. But that figure is based entirely on Roblox’s own reporting, offering no independent verification and serving only to illustrate how little effort Roblox makes to identify and report child endangerment on its platform. Roblox’s self-reported data to NCMEC, flawed and limited as it is, still reveals a disturbing trend: Roblox’s reports about suspected child sexual exploitation have surged nearly twenty-fold over recent years, from 675 reports in 2019 to 13,316 reports in 2023.¹⁰¹

118. The threat to children on Roblox reaches far beyond its games. Investigators found that a basic search for “adult” among the communities on the platform led directly to a group of more than 3,300 users trafficking in child pornography and soliciting minors.¹⁰² These users uncovered even larger criminal communities—including one with more than 103,000 members¹⁰³—despite Roblox’s claims that safety is its number one priority and it takes “every precaution possible” to protect children.

119. By representing its platform as safe, but designing it in a way that exposes children to sexual conduct, Roblox inflicts substantial harm upon children. This exposure does not merely “influence” children—it warps their understanding of safety and consent. When Roblox allows sexual exploitation to masquerade as entertainment, it teaches young users that predatory behavior

¹⁰¹ 2019 CyberTipline Reports by Electronic Services Providers (ESP) at 4, Nat’l Ctr. for Missing & Exploited Children (2020), <https://www.missingkids.org/content/dam/missingkids/pdfs/2019-reports-by-esp.pdf> (last visited Dec. 10, 2025); 2023 CyberTipline Reports by Electronic Services Providers (ESP) at 6, Nat’l Ctr. for Missing & Exploited Children (2024), <https://www.missingkids.org/content/dam/missingkids/pdfs/2023-reports-by-esp.pdf> (last visited Dec. 10, 2025).

¹⁰² Hindenburg Research, *supra* n.56.

¹⁰³ *Id.*

is normal. Children, still developing their moral compass, internalize what the platform rewards. And when sexual aggression is presented as exciting or humorous, Roblox sends its youngest players the dangerous message that harassment and exploitation are acceptable.

120. Research confirms what common sense makes obvious: sexualized gameplay has serious real-world consequences. Studies show that players exposed to such content are more likely to engage in sexual harassment and, years later, in risky sexual behavior.¹⁰⁴ The harms are both immediate and enduring, leaving lasting marks on young users' understanding of boundaries, consent, and safety.

E. Roblox is—and has been—aware of the dangers to children on its platform, but prioritized profits over safety.

121. A platform with inadequate verifications, millions of child users, and unchecked user-generated content is an ideal environment for a child predator. Roblox has become exactly that: the website of choice for adults seeking access to underage children.

122. As discussed, Roblox's scripting language gives developers unchecked power over avatar behavior, and it has been widely used to manufacture scenes of simulated sexual activity. Roblox, therefore, knows these sexualized interactions permeate Roblox. Parents have repeatedly reported disturbing encounters involving nude avatars, sexting, simulated sexual assault, and adult predators targeting children on the platform.¹⁰⁵

¹⁰⁴ Jonathan Burnay, Brad J. Bushman & Frank Larøi, *Effects of Sexualized Video Games on Online Sexual Harassment*, 45 AGGRESSIVE BEHAVIOR 2, 214 (March/April 2019); Jay G. Hull et al., *A Longitudinal Study of Risk-Glorifying Video Games and Behavior Deviance*, 107 J. PERS. SOC. PSYC. 2 (2014).

¹⁰⁵ *Parent Reviews of Roblox*, Common Sense Media, <https://www.commonsensemedia.org/websitereviews/roblox/user-reviews/adult> (last visited Dec. 10, 2025).

123. Major advocacy organizations have likewise denounced Roblox for exposing children to danger. The National Center on Sexual Exploitation (“NCOSE”) named Roblox to its “Dirty Dozen” initiative, which identifies companies that contribute to or benefit from sexual exploitation. According to NCOSE, Roblox “treat[s] child protection like a game,” and “[u]ntil basic child protection standards are met, Roblox remains too high risk for kids.”¹⁰⁶

124. In 2021, Roblox admitted to its shareholders and regulators that it has “faced allegations that our Platform has been used by criminal offenders to identify and communicate with children and to possibly entice them to interact off-Platform.”¹⁰⁷ Three years later, Roblox reported these same issues in SEC filings.¹⁰⁸

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

- a. “Unfortunately, it is worse now due to Roblox’s moderation being so abysmal and Roblox being a far more widespread platform. Creeps flock aplenty when before the creep: kid ratio was much much lower . . . Roblox

¹⁰⁶ *The Dirty Dozen List ‘24: Roblox, A Mainstream Contributor to Sexual Exploitation*, Nat’l Ctr. on Sexual Exploitation, <https://endsexualexploitation.org/roblox/> (last updated Dec. 4, 2024) (last visited Dec. 10, 2025).

¹⁰⁷ Roblox Corp., *2021 Q3 2021 Form 10-Q (Quarterly Report)*, at 58, (Nov. 9, 2021), <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ad69fbb0-a7b7-465b-942f-53206ff42303.pdf> (last visited Dec. 10, 2025).

¹⁰⁸ Roblox Corporation, *Q2 2024 Form 10-Q*, at 57, U.S. SEC (Aug. 2, 2024), <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/785cb7e2-c792-470e-9ff1-021a0bbdf077.pdf> (last visited Dec. 10, 2025).

has no interest in actually fixing the issues so long as the bad press doesn't end up viral.”¹⁰⁹

- b. “No. Roblox is not safe for children. The amount of NSFW [Not Safe for Work] I see on this platform on a daily basis is unbelievable. I'm surprised COPPA hasn't taken any action.”¹¹⁰
- c. “I believe they need to automatically rate these games for older audiences, if not, you know, removing them entirely. I could keep going on about this issue, but it's just beating a dead horse at this point.”¹¹¹
- d. “Roblox got banned for bad moderation; Turkey banned it to ‘protect children,’ and they are not wrong. The amount of visits from 10 of these games is, in summary, 100 million+. I don't want to know how many of these children have seen nudity or even developed a p*rn addiction. But that is a big problem with Roblox doing almost nothing to prevent it.”¹¹²

126. These firsthand accounts from developers reveal a troubling environment marked by systemic inattention, in which harmful content proliferates, predatory behavior persists, and Roblox repeatedly fails to respond despite widespread and urgent notifications.

¹⁰⁹ Edwin Dorsey, *Problems at Roblox (RBLX)* #5, The Bear Cave (Oct. 17, 2024), <https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

¹¹⁰ *Id.*

¹¹¹ *Id.*

¹¹² *Id.*

127. The underlying cause of Roblox’s continued tolerance of such conduct, notwithstanding its documented knowledge, is clear: Roblox wanted to grow its user base, and so it lied to avoid any risk of slowing down its massive growth.

128. Roblox faced intense pressure to accelerate growth and maximize revenue over protecting children. Rather than adopt industry standard measures, like sensible parental controls that allow parents to choose what content their child views, Roblox made a calculated choice to let users of any age join with just a few clicks. This no-barrier approach ensured rapid expansion at all costs, even if it meant exposing youngest children to the platform’s dangers.

129. When Roblox went public in 2021 at a \$41 billion valuation, the company faced intensified pressure to deliver rapid expansion. In response, Roblox prioritized aggressive increases in revenue and engagement metrics, including user acquisition, daily active users, and average time on the app, expecting that profits would come only after the platform grew large enough to dilute its operating costs.¹¹³

130. Roblox’s drive to deliver headline growth consistently overrode its professed commitment to child safety, a commitment to which it only paid lip service. Despite assurances that child safety came first, executives shot down employee proposals for parental-approval safeguards, and workers described explicit pressure to avoid any fix—no matter how necessary—that might reduce engagement. Even measures that would have blocked predators’ access to children were rejected because they threatened growth metrics.¹¹⁴

¹¹³ Hindenburg Research, *supra* n.56.

¹¹⁴ *Id.*

131. One former Roblox employee put it bluntly: “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.” 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.”¹¹⁵

132. Roblox recently reiterated this trade-off, explaining that “[o]ur safety changes have impacted and in the future may continue to impact user engagement, retention, revenue, and bookings, particularly from younger users.”¹¹⁶

133. Safety features, like parental controls that work, that limit play time and enable parents to monitor and police their children’s activity, would reduce engagement, and thus would reduce revenue. This is why Roblox refuses to implement better controls—their business model requires this unsafe architecture.

134. Cutting back on safety protections let Roblox grow its user base while shrinking safety costs relative to revenue—exactly what Wall Street wanted to see. Investors have repeatedly signaled that child-protection spending hurts Roblox’s stock.¹¹⁷ Barclays went so far as to describe added safety measures for Roblox’s young users as a “downside case” for Roblox’s stock:

¹¹⁵ *Id.*

¹¹⁶ Roblox Corp., Quarterly Report (Form 10-Q), at 15 (Sept. 30, 2025).

¹¹⁷ Ross Sandler, *Trevor Young & Alex Hughes, Back on Track Following the 1H Hiccup*, Barclays (Aug. 1, 2024)

“additional safety investments due to its younger demographic . . . [becoming] a drag on [earning] margins” and deemed any rise in safety costs a “negative” in the company’s quarterly earnings.¹¹⁸

135. For example, on Roblox’s 2023 fourth quarter earnings call, an analyst praised the “really high level of efficiency” seen in the numbers for infrastructure and trust and safety expenditures and then asked how those figures would evolve over time.¹¹⁹ In response, Mike Guthrie, Roblox’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 [L]ike you said, it’s about 11% now, ultimately with higher efficiency . . . we see that as a high-single-digit number over the next few years.”¹²⁰ He added, “[W]e still think there’s more to do there.”¹²¹

136. At other times, Guthrie has reassured investors stating, “look for trust and safety [costs] to scale below linear as we grow” and that Roblox was “quite happy with” trust and safety costs growing “at a lower rate than our bookings growth.”¹²²

¹¹⁸ Ross Sandler, *Trevor Young & Alex Hughes, Everything Accelerating, Safety & Security a Top Priority*, Barclays (Nov. 1, 2024)

¹¹⁹ Q4 2023 Earnings Call (Feb. 7, 2024). [A rough transcript of the earnings call is available at <https://www.insidermonkey.com/blog/roblox-corporation-nyserblx-q4-2023-earnings-call-transcript-1255542/?singlepage=1>].

¹²⁰ *Id.*

¹²¹ *Id.*

¹²² Q4 2022 Earnings Call (Feb. 15, 2023). [A rough transcript of the earnings call is available at <https://www.insidermonkey.com/blog/roblox-corporation-nyserblx-q4-2022-earnings-call-transcript-1121321/?singlepage=1>].

137. Once public, Roblox also decided to try to attract more adult users to its app—which it had historically touted as the “#1 gaming site for kids and teens.”¹²³ With the market for underage users near saturation, Roblox shifted its growth strategy to attracting older users.

138. In its public offering filings, Roblox made clear that a core business goal was “aging up” its user base by rolling out experiences tailored to older players.¹²⁴ This shift wasn’t just about adding more users; it was about chasing higher revenue. Kids may clock endless hours on Roblox, but they have little ability to spend. Roblox openly stated that older players “monetize better” and give the company a far more profitable return.¹²⁵

139. Roblox repeatedly stressed its intention to “age up” the platform. At a September 2021 investment-bank conference, CFO Michael Guthrie announced that Roblox already enjoyed “very good penetration of nine to twelve year-olds” and was turning its focus to users over 13.¹²⁶ Executives planned to “improve the search algorithms such that older users were finding older content,” thereby steering older users toward age-specific material.¹²⁷

140. Despite intentionally courting older users, Roblox made no meaningful effort to protect children from adult users or from the mature experiences it was actively promoting. When pressed by an equity research analyst about content for ages 13 and up, CEO Baszucki openly

¹²³ Roblox, *What Is Roblox*, <http://web.archive.org/web/20170227121323/https://www.roblox.com/> (archived Feb. 27, 2017).

¹²⁴ Roblox Corp., S-1 (Securities Registration Statement), at 7 (Nov. 19, 2020).

¹²⁵ Q2 2022 Earnings Call (Aug. 10, 2022). [A rough transcript is available at https://finance.yahoo.com/quote/RBLX/earnings/RBLX-Q2-2022-earnings_call-27342.html].

¹²⁶ Roblox at Goldman Sachs Communicopia Conference (Sep. 9, 2021), <https://ir.roblox.com/events-and-presentations/events/event-details/2021/Goldman-Sachs-Communicopia/default.aspx>

¹²⁷ *Id.*

admitted, “I want to highlight right now that we don’t have any only 13 and up experiences. We have 28% of the top thousand experiences having a majority of 13-plus [users] but those are still experiences that are open to all ages.” And even while urging developers to produce experiences for users 17 and older, Roblox imposed zero access restrictions on children.¹²⁸

141. Roblox not only chased a larger adult user base despite the obvious risks to children, but it also moved to encourage relationships between users. During the 2023 Developers Conference, CEO Baszucki made the company’s ambition unmistakable—promoting “real-life relationships” and, while sidestepping the term “dating,” stated: “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.”¹²⁹

142. One year later, Baszucki explicitly acknowledged this strategy, conceding it may be “edgy” but then mocking 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.¹³⁰ In sum, Roblox has repeatedly traded child protection for growth. For years, the company has treated well-known safety problems as secondary to expanding its user base and revenue. That sustained choice reflects a calculated decision to pursue profit and

¹²⁸ Q4 2022 Earnings Call (Feb. 15, 2023). [A rough transcript is available at https://finance.yahoo.com/quote/RBLX/earnings/RBLX-Q4-2022-earnings_call-43436.html].

¹²⁹ Roblox Developers Conference 2023 Keynote (Sep. 8, 2023), *available at* <https://www.youtube.com/watch?v=CwLThCghzA4>.

¹³⁰ Roblox Developers Conference 2024 Keynote (Sep. 6, 2024), *available at* <https://www.youtube.com/watch?v=HwbcWc2CwnM>.

growth even if it means abandoning its most basic obligation to protect the children who use its platform.

III. ROBLOX'S POLICY CHANGES ARE TOO LITTLE AND TOO LATE.

143. In November 2024, only after years of mounting pressure—and dozens of private lawsuits—did Roblox announce any changes to child safety features. These changes were prompted by a scathing report published by a well-known short seller accusing the platform of being a “pedophile hellscape for kids.”¹³¹ Released on October 8, 2024, the report sparked public outrage, detailing many of the issues described above that Roblox had ignored for years.

144. A little more than a month later, Roblox announced a series of alleged changes, including removing the ability to message others outside of experiences for under 13-year-old users; 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; 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.¹³²

145. In July 2025, Roblox introduced an optional feature for teenagers called “Trusted Connections,” which allows unfiltered voice and text communication between users.¹³³ To qualify, a user must verify their age through a video selfie. Teen users aged 13 to 17 may connect with

¹³¹ Hindenberg Research, *supra* n.56.

¹³² *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/>.

¹³³ 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/>.

adults only if the adult is added through an in-person QR code scan or via a phone number. If Roblox’s AI review of the optional selfie concludes that a user is under 13, that user automatically loses access to features the company classifies as inappropriate for their age.

146. In August 2025, Roblox announced new rules banning content that even hints at sexual activity and cutting off minors from experiences set in bedrooms, bars, and other private or adults-only spaces.¹³⁴ The following month, Roblox restricted all users’ access to experiences that were “unrated,” meaning they lacked a maturity label.¹³⁵ Previously, anyone who listed a birthdate that would put their age at over 13 years old could access such experiences.

147. These changes do nothing. Roblox continues to slap maturity labels on experiences based solely on whatever the creator checks off in a form, with little effort to confirm whether the content matches the label. And without verification, those labels are worthless—something proven time and again by “innocent” experiences that hide dangerous content, like a “Public Bathroom Simulator” that is “open to all ages” but replete with avatars having sexual intercourse. This egregious content frequently slips through the cracks, despite Roblox’s assurances to the contrary.

148. Most recently, in September 2025, Roblox announced an “ambitious plan” to “expand age estimation to all users” who wish to use the chat feature, which purports to require users to undergo a “Facial Age Estimation” check, processed by a third-party vendor—named “Persona”—using Artificial Intelligence and would assign users to an assigned age group: under

¹³⁴ 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/>

¹³⁵ 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/>.

9, 9-12, 13-15, 16-17, 18-20, or 21+.¹³⁶ Users would be able to chat with only those users in the same group and would be limited to “age-appropriate experiences.”¹³⁷

149. Even with these policy updates (and those to come), Roblox does not have sufficient safety features in place to prevent children from creating their own accounts and playing on Roblox without parental oversight. Most fundamentally, Roblox does nothing to confirm or document that parental consent has been given, no matter how young a child is. Nor does Roblox require a parent to confirm the age given when a child signs up to use Roblox.

150. At every turn, even where messaging is nominally restricted by age, predators can still communicate with children through public in-game chats; indeed, Roblox has left intact the very blueprint predators have always used—entering games they know children frequent. And interaction in the game has never been limited to chat—as described earlier, users routinely interact through their avatars’ actions and gestures.

151. None of Roblox’s purported fixes address the core problems, including its refusal to require parental consent for account creation. Roblox has not committed to increasing content-moderation staff, nor has it implemented identity checks to prevent registered sex offenders from creating accounts. Children under 13 can also continue to receive friend requests within “experiences.” As a result, despite these recent changes, Roblox continues to leave children highly vulnerable to predators.

152. Roblox’s deployment of its Facial Recognition AI tool inspires little confidence and appears fundamentally unreliable. Roblox itself acknowledges that “Persona’s age estimation models achieved a Mean Absolute Error (MAE) of 1.4 years for minors under 18 based on testing

¹³⁶ Roblox, *About Facial Age Estimation*, available at <https://corp.roblox.com/age-estimation> (last visited Dec. 10, 2025).

¹³⁷ *Id.*

by the Age Check Certification Scheme (ACCS) in UK.”¹³⁸ In practice, however, users are already experiencing more substantial variation. Using Roblox and Persona’s tool that is already available (but not yet required), several individuals on the internet reported that the Roblox selfie verification system mischaracterized their age. One woman, for example, reported she is “a grown woman” but the system identified her as “12.”¹³⁹ The system also mistook a 20-year old individual who “has a baby face” for being 13.¹⁴⁰ Yet another individual claims their friend’s brother “who is 14, got passed as 18+ . . . which just shows that the platform is ruined because minors can still be in contact with adults [no] matter what they do.”¹⁴¹

153. Equally problematic, users have been easily able to dupe other versions of this tool. The United Kingdom recently passed age verification laws that require users to submit personal information to access websites that contain adult themes. There, “intrepid teens, or just those that don’t want to feed in personal information to the government, are finding video game-based ways to get around these new systems, namely one that requires ‘live selfies’ to verify your identity as an adult through facial age estimation.”¹⁴² Forbes reports that “a lot of UK internet users started looking like *Walking Dead* star Norman Reedus . . . because of his role in *Death Stranding 2*, where a hyper-realistic version of the actor appears in the game and can be posed in various ways in

¹³⁸ *Id.*

¹³⁹ Patricia Hernandez, *Roblox’s Selfie Verification is a Preview of an Annoying Internet Future*, POLYGON (Nov. 19, 2025), available at <https://www.polygon.com/roblox-age-verification-id-check-user-issues-child-safety/>.

¹⁴⁰ *Id.*

¹⁴¹ *Id.*

¹⁴² Paul Tassi, *The UK’s Internet Age Verification Is Being Bypassed By Death Stranding 2, Garry’s Mod*, FORBES (July 31, 2025), available at <https://www.forbes.com/sites/paultassi/2025/07/31/the-uks-internet-age-verification-is-being-bypassed-by-death-stranding-2-garrys-mod/>.

photo mode, including performing actions the UK system requests like opening and closing your mouth.”¹⁴³

154. Studies reviewing AI-based age-estimation systems have similarly suggested that these technologies don’t work equally well for everyone. The Guardian’s analysis of data collected on a trial of AI-based age technology showed that the AI-based age-estimation systems are less accurate for individuals with darker skin tones, often misclassifying those adults as being under 18.¹⁴⁴ The same study suggests that while “[the tools] might be good enough to distinguish between a 16-year-old and a 30-year-old, but they certainly are not good enough to distinguish between a 16-year-old and a 15, 14, or indeed 17-year old” and “trial data shows false positive rates (where a person has falsely been predicted to exceed the age requirement) of between 25% and 73% for kids under 16.”¹⁴⁵ In other words, the data suggests the very group to which these modifications are targeted are most prone to false positives and will thus will likely remain unprotected.

155. Instead of addressing its systemic failures, Roblox has orchestrated a misleading PR campaign, using supposedly independent online-safety organizations to sanitize its public image. Central to this strategy was Roblox’s reliance on supposedly neutral online-safety organizations to endorse its initiative. One example involved the Family Online Safety Institute’s CEO, Stephen Balkam, applauding Roblox’s new safety features.¹⁴⁶ Left unsaid was the critical

¹⁴³*Id.*

¹⁴⁴ Nick Evershed & Josh Nichols, *Social Media Ban Trial Data Reveals Racial Bias in Age Checking Software: Just How Inaccurate Is It?* THE GUARDIAN (Sept. 18, 2025), available at <https://www.theguardian.com/news/2025/sep/19/how-accurate-are-age-checks-for-australias-under-16s-social-media-ban-what-trial-data-reveals>.

¹⁴⁵ *Id.*

¹⁴⁶ Anna Halkidis, *What Roblox’s Latest Changes Mean for Your Kids’ Online Safety*, PARENTS (Nov. 18, 2024), available at <https://www.parents.com/roblox-new-parental-controls-8747405> (last visited Dec. 10, 2025).

fact that Roblox’s own Vice President of Civility and Partnerships, Tami Bhaumik, is FOSI’s board chair.¹⁴⁷ This carefully engineered arrangement exposes how Roblox weaponizes nominally independent groups as spokespeople to distort the truth and manipulate public perception.

156. By way of another example, Roblox’s press release announcing certain updates quotes Larry Magid, the CEO of ConnectSafely, as saying “Roblox has consistently provided parents with tools that enable their children to enjoy the platform, while protecting them against online risks. These new friend-and-experience-blocking tools provide parents with even more ways to help ensure their children are using it safely. Safety, fun, and adventure are not mutually exclusive.”¹⁴⁸ What this press release left out was that ConnectSafely—a non-profit supposedly focused on educating people about internet safety—is funded by tech companies and identifies Roblox as one of its “supporters.”¹⁴⁹

VIOLATIONS OF THE LAW
COUNT 1 – THE TENNESSEE CONSUMER PROTECTION ACT
Tenn. Code Ann. § 47-18-104(a) and (b)

157. Tennessee re-alleges and incorporates by reference all prior paragraphs of this Complaint.

158. Roblox has engaged in trade and commerce pursuant to the TCPA. Among other ways of engaging in trade and commerce, Roblox sold “Robux” gift cards in the State and provided services in the State by making its platform available.

¹⁴⁷ *FOSI Welcomes Roblox Vice President as New Board Chair*, FOSI (Oct. 12, 2022), available at <https://www.fosi.org/aboutpress/fosi-welcomes-roblox-vice-president-as-new-board-chair/> (last visited Dec. 10, 2025).

¹⁴⁸ Matt Kaufman, *New Tools for Parents to Personalize Their Child’s Experience on Roblox*.

¹⁴⁹ ConnectSafely, *Supporters*, <https://connectsafely.org/about-us/supporters/> (last accessed May 10, 2025).

159. Roblox has repeatedly violated the TCPA by engaging in the unfair and deceptive practices described in this Complaint.

160. As described in this Complaint, Roblox has repeatedly deceived consumers through its words, conduct, silence, and action—in violation of the TCPA.

161. Specifically, Roblox engaged in this conduct by, among other false, misleading, and deceptive statements detailed above, the following:

- a. Representing and falsely assuring the public that its services were safe for children, and thereby representing its services as having characteristics, uses, and benefits that it does not have in violation of Tenn. Code Ann. § 47-18-104(b)(5) and (27);
- b. Representing that its services are safe for children and that reasonable guardrails and safety measures existed when, in actuality, its services pose serious harm and lack sufficient measures to protect children in violation of Tenn. Code Ann. § 47-18-104(b)(5), (7), and (27);
- c. Falsely, misleadingly, and deceptively representing that it has taken “every precaution possible” to protect children in violation of Tenn. Code Ann. § 47-18-104(b)(27);
- d. Falsely, misleadingly, and deceptively representing that Roblox is “a safe, moderated place” in violation of Tenn. Code Ann. § 47-18-104(b)(5), (7), and (27);
- e. Falsely, misleadingly, and deceptively representing that safety is Roblox’s number one priority in violation of Tenn. Code Ann. § 47-18-104(b)(27);

- f. Falsely, misleadingly, and deceptively representing that Roblox engages in fulsome content review and employs a team of “thousands” of content moderators in violation of Tenn. Code Ann. § 47-18-104(b)(5), (7), and (27);
- g. Falsely, misleadingly, and deceptively representing that Roblox has a no-tolerance policy for obscenities, sexual content, and other inappropriate content, and “immediately suspended or permanently expelled” offenders in violation of Tenn. Code Ann. § 47-18-104(b)(5), (7), and (27);
- h. Falsely, misleadingly, and deceptively representing that “Everything” on Roblox “is reviewed by ... real life humans” in violation of Tenn. Code Ann. § 47-18-104(b)(7) and (27);
- i. Falsely, misleadingly, and deceptively representing that Roblox reviews its content with a large team of human moderators and machine detection before they are made available to users in violation of Tenn. Code Ann. § 47-18-104(b)(5),(7) and (27); and
- j. Falsely, misleadingly, and deceptively claiming that bad actors are “dealt with swiftly” on Roblox and that it “remove[s] any content that’s reported to us within minutes,” in violation of Tenn. Code Ann. § 47-18-104(b)(7) and (27).

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

As a result, without proper warning or notice to parents, Tennessee consumers were induced into a transaction they would not have entered had the information been disclosed.

163. The above-described acts, omissions, and affirmative statements are material, insofar as they have the capacity to influence—and did in fact influence—reasonable consumers’ decisions about whether to engage with Roblox.

164. Each instance of Roblox’s deceptive practices constitutes a separate violation of the TCPA.

REQUEST FOR RELIEF

Plaintiff respectfully requests that this Court:

- a. Order that this Complaint be filed without cost bond as provided by Tenn. Code Ann. §§ 20-13-101 and 47-18-116;
- b. Enter judgment against Roblox in favor of the State for each violation alleged in this Complaint;
- c. Order Roblox to separately pay civil penalties to the State of Tennessee not more than \$1,000 per violation of the TCPA as provided by Tenn. Code Ann. § 47-18-108(b)(3);
- d. Order Roblox to separately pay civil penalties to the State of Tennessee not more than \$10,000 per violation of the TCPA occurring within Tennessee as provided by Tenn. Code Ann. § 47-18-125(b), from April 23, 2024 forward;
- e. Permanently enjoining Roblox, its agents, employees, and all other persons acting on its behalf from engaging in the above acts, practices, and conduct in trade or any other practice in violation of the TCPA;

- f. Enter a judgment against Roblox and in favor of the State of Tennessee for the reasonable costs and expenses of the investigation and prosecution of Roblox's unlawful conduct, including attorney's fees, expert and other witness fees, and costs, as provided by Tenn. Code Ann. § 47-18-108(a)(6) and (b)(4);
- g. Order that all costs in this case be taxed against Roblox and no costs be taxed against the State of Tennessee as provided in Tenn. Code Ann. § 47-18-116;
- h. Award any and all such further relief as the Court deems just and proper.

Dated: December 18, 2025

Respectfully submitted,



JONATHAN SKRMETTI
Attorney General and Reporter
B.P.R. No. 031551

/s/ Kelley L. Groover

KELLEY L. GROOVER, B.P.R. No. 034738

Sr. Assistant Attorney General

SOPHIE ASSADNIA, B.P.R. No. 042029

Assistant Attorney General

ZACHARY CLARK, B.P.R. No. 043555

Director of Strategic Litigation

JACOB DURST, B.P.R. No. 042032

Assistant Attorney General

Office of the Tennessee Attorney General

P.O. Box 20207

Nashville, TN 37202

P: (615) 741-1671

F: (615) 532-2910

kelley.groover@ag.tn.gov

sophie.assadnia@ag.tn.gov

zachary.clark@ag.tn.gov

jacob.durst@ag.tn.gov

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV, B.P.R. No. 23045

Michael C. Iadevaia, B.P.R. No. 041622

Kyle C. Mallinak, B.P.R. No. 032239

STRANCH, JENNINGS & GARVEY, PLLC
223 Rosa L. Parks Avenue, Suite 200 Nashville,
Tennessee 37203
Phone: 615-254-8801
Fax: 615-255-5419
gstranch@stranchlaw.com
miadevaia@stranchlaw.com
kmallinak@stranchlaw.com

Attorneys for Plaintiff, State of Tennessee