

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT  
IN AND FOR BAKER COUNTY, FLORIDA**

OFFICE OF THE ATTORNEY GENERAL,  
STATE OF FLORIDA,  
DEPARTMENT OF LEGAL AFFAIRS

*Plaintiff,*

v.

ROBLOX CORPORATION,

*Defendant.*

**COMPLAINT**

1. Roblox has become the most popular online gaming platform in the world by selling itself as the safest gaming platform in the world—a new digital playground that is educational, fun, and appropriate for kids. In reality, Roblox is the new hunting ground for sexual predators. In this playground, adults can pretend to be children. And even known sex offenders are allowed to play. These predators use the Roblox app to find, groom, and abuse children. Florida children have been coerced to take and send explicit sexual images of themselves. Others have been physically abducted and raped.

2. Roblox has knowingly facilitated this abuse. The platform is designed to attract children and enable them to interact with strangers. At the same time, Roblox has indiscriminately sought user growth, and resulting revenue, by attracting more adults to the platform as well. Meanwhile, Roblox has refused to implement readily available child-safety features. For example, Roblox has long made no effort to verify users' age or obtain parental consent at signup. As a result, adults can pretend to be children—and more easily contact and groom actual children—while children can easily evade even the minor protections that Roblox has implemented.

3. The hypersexual virtual world that has evolved in the absence of these basic protections is predictable, but nonetheless heinous. The Roblox platform is replete with games based on real-life crimes against children—games recreating the notorious Diddy “freak-off” parties, games set on Jeffrey Epstein’s private island—that are fully available for young children to play. Independent investigators have created Roblox accounts in the guise of child users and soon found themselves subject to such content and to sexual abuse from other users.

4. Widely publicized reports have followed over the years, including last year’s blockbuster report dubbing Roblox a “Pedophile Hellscape for Kids.”<sup>1</sup> As another report, titled “Roblox’s Pedophile Problem,” put it: “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.”<sup>2</sup> Roblox has, accordingly, found itself consistently on the National Center for Sexual Exploitation’s “Dirty Dozen List” of entities that facilitate and profit from sexual abuse—a distinction that Roblox has chosen to ignore.

5. Instead, Roblox has chosen to put more and more children in danger by continuing to falsely and deceptively represent its platform as safe. And though growing public outcry has finally caused Roblox to adopt some child-safety measures, these changes are all superficial and serve only to highlight how unsafe Roblox has been and still is.

6. Pursuant to Section 501.207(1)(b) of the Florida Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Fla. Stat. (“FDUTPA”), the Attorney General hereby petitions the Court to enter judgment in favor of the Attorney General and against Roblox for violations of

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<sup>1</sup> *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, Hindenburg Research (Oct. 8, 2024), <https://hindenburesearch.com/roblox/> (“*Pedophile Hellscape Report*”).

<sup>2</sup> Olivia Carville & Cecilia D’Anastasio, *Roblox’s Pedophile Problem*, Bloomberg Businessweek (July 23, 2024), <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/>.

FDUTPA, to award all civil penalties, and to enjoin Roblox from its continuing violations of FDUTPA. Absent this relief, these violations have harmed and will continue to harm Florida's most vulnerable.

### **PARTIES**

7. Plaintiff Attorney General James Uthmeier is authorized to enforce FDUTPA. § 501.203(2), Fla. Stat. The Attorney General has investigated the matters alleged in this Complaint and determined that this enforcement action serves the public interest as required by § 501.207, Fla. Stat.

8. Defendant Roblox Corporation ("Roblox") is a Nevada corporation with its principal place of business in San Mateo, California registered with the Florida Secretary of State as a foreign corporation. Roblox owns, operates, controls, produces, designs, maintains, manages, develops, tests, labels, markets, advertises, promotes, supplies, and distributes the Roblox app. Roblox is widely available to consumers throughout Florida.

### **JURISDICTION AND VENUE**

9. This is an action for injunctive relief, consumer restitution, civil penalties, attorney's fees and costs, and other statutory and equitable relief against Roblox under FDUTPA.

10. The Attorney General seeks relief in an amount greater than fifty-thousand dollars (\$50,000), exclusive of fees and costs.

11. Roblox's statutory violations occurred in or affect more than one judicial circuit in the State of Florida, including the Eighth Judicial Circuit in and for Baker County.

12. This Court has subject-matter jurisdiction over this matter.

13. Venue is proper in this County under § 47.051, Fla. Stat., because the cause of action arose, in substantial part, in this Circuit and throughout Florida. Roblox has engaged in

transactions in this State, by offering its app to Florida residents, marketing to Florida parents and children, and causing injury to Florida minors and families.

14. This Court has personal jurisdiction over Roblox under Florida’s long-arm statute, § 48.193(1)(a)(1), Fla. Stat., because Roblox purposefully directs its activities towards Florida residents, including Florida children, by operating and providing access to its app in Florida; by advertising and marketing its app to Florida parents and children; by collecting data and payments from Florida users; by offering for sale, and selling, its online digital currency (“Robux”) to Florida consumers; and by otherwise entering into terms-of-service contracts and electronic transactions in Florida.

15. Moreover, Roblox is subject to the jurisdiction of this Court pursuant to § 501.1735(5), Fla. Stat., which provides that “[f]or purposes of bringing an action pursuant to this section, any person who meets the definition of online platform which operates an online service, product, game, or feature likely to be predominantly accessed by children and accessible by Florida children located in this state is considered to be both engaged in substantial and not isolated activities within this state and operating, conducting, engaging in, or carrying on a business, and doing business in this state, and is therefore subject to the jurisdiction of the courts of this state.”

16. Roblox has also engaged in continuous and systematic business contacts with Florida, including by: distributing and furnishing its platform throughout Florida; by maintaining user accounts for Florida residents; by processing purchases made in Florida; by accessing and processing children’s personal data; by selling Robux gift cards and physical Roblox toys at brick-and-mortar retailers throughout Florida; and by communicating with Florida parents and children

about its app's features, safety settings, and policies. Roblox intended for its platform to be available and used in Florida.


17. The conduct and violations of law described in this Complaint arise from Roblox's conduct in Florida and its contacts with Florida consumers.

### **FACTUAL ALLEGATIONS**

18. Launched in 2006, Roblox has served for years as the online platform of choice for sexual predators seeking to find, groom, abuse, and exploit children. As explained more fully below, Roblox has knowingly and willfully facilitated this exploitation as follows. **(I)** Roblox makes its gaming platform easily accessible to children and adults alike. **(II)(A)** Although Roblox proclaims that it seeks to “bring the world together through play,” the company has in fact pursued user growth above all else, including child safety. **(II)(B)** Roblox thus provides adult predators with easy access to tens of millions of children while failing to provide those children or their parents with adequate, readily available safeguards or with any notice of the predators lurking on the platform. **(II)(C)** As a result, the platform is overrun with egregious sexual content, creating the conditions that are well-known to make children susceptible to grooming and exploitation. **(II)(D)** Inevitably, the abuse has crept into the real world, where children throughout the State and country have been abducted, raped, and otherwise harmed for life by predators who found them on Roblox. **(II)(E)** Only in the face of mounting public concern has Roblox begun to implement some basic safety measures for U.S. users. But even these are too little, too late. They could all have been implemented before, and they still provide U.S. children with less protection than Roblox is providing to child users elsewhere. **(III)** All the while, Roblox has continued to seek growth—and sacrifice children to profit—by falsely representing its platform as a benign, safe learning environment, rather than the predatory hellscape that it is.

## I. Roblox Attracts and Exploits Vulnerable Child Users by Design.

19. Roblox originated as an app for children, and it still is largely marketed and designed that way. Not only is the Roblox platform, according to Roblox, the “#1 gaming site for kids and teens,”<sup>3</sup> it is purportedly educational, offering young users “new gateways into learning.”<sup>4</sup>



**Learners**

Roblox is a collaborative and civil place to learn

Why learn on Roblox?

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

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

20. Roblox is also designed to encourage relationships among users, including through gameplay interactions, user hubs, direct messaging, and even voice chat. Roblox’s co-founder and CEO, David Baszucki, has described Roblox as “a new category of human coexperience” that will bring about “the next phase of human interaction.”<sup>5</sup> Roblox has similarly described itself as “a human co-experience platform . . . where users interact with each other to explore and develop

<sup>3</sup> *What Is Roblox*, Roblox, <http://web.archive.org/web/20170227121323/https://www.roblox.com/> (archived Feb. 27, 2017).

<sup>4</sup> *A New Era of Engaged Learning*, Roblox, <https://corp.roblox.com/education> (last visited Dec. 5, 2025).

<sup>5</sup> David Baszucki, *The CEO of Roblox on Scaling Community-Sourced Innovation*, Harv. Bus. Rev., The Magazine (Mar-Apr 2022), <https://hbr.org/2022/03/the-ceo-of-roblox-on-scaling-community-sourced-innovation>.

immersive, user-generated, 3D experiences.”<sup>6</sup>

21. This vision is as pervasive as it sounds. At Roblox’s 2023 Developers Conference, Baszucki revealed Roblox’s strategy to facilitate “real-life relationships” between users—*i.e.*, dating. Although he avoided the word “dating,” he announced plans to support it: “I’m not going to use the D word but subsequent[] real-life relationships is going to happen, okay? And we’re going to build a platform to support that.”<sup>7</sup> By the next year’s conference, Baszucki explicitly acknowledged this strategy. He acknowledged that online dating is “edgy,” but mocked his own safety team’s concerns about the dangers: “the policy and safety team told me [dating and real-life relationships] isn’t within our current policy right now.”<sup>8</sup> The audience laughed.

22. Roblox accordingly makes it extremely easy for children—and adults—to “SIGN UP AND START HAVING FUN!” The Roblox app is free to download and use and is available on various gaming consoles, computers, tablets, and cellular devices. Users only need an account. And to create an account, users must provide only a birthdate, username, and password.

23. Users of any age can create an account. There is no age minimum. Roblox does not require users to verify their age upon sign-up, so children can easily represent that they are older—or adults can easily represent that they are younger—than their actual age.

24. During the Attorney General’s investigation, an investigator in the Attorney General’s Office set up various accounts on Roblox and used these accounts to test the platform’s accessibility to minors and other features, such as age verification and facial age estimation. The investigator created and used accounts for a seven-year-old girl, an eight-year-old-boy, a ten-year-

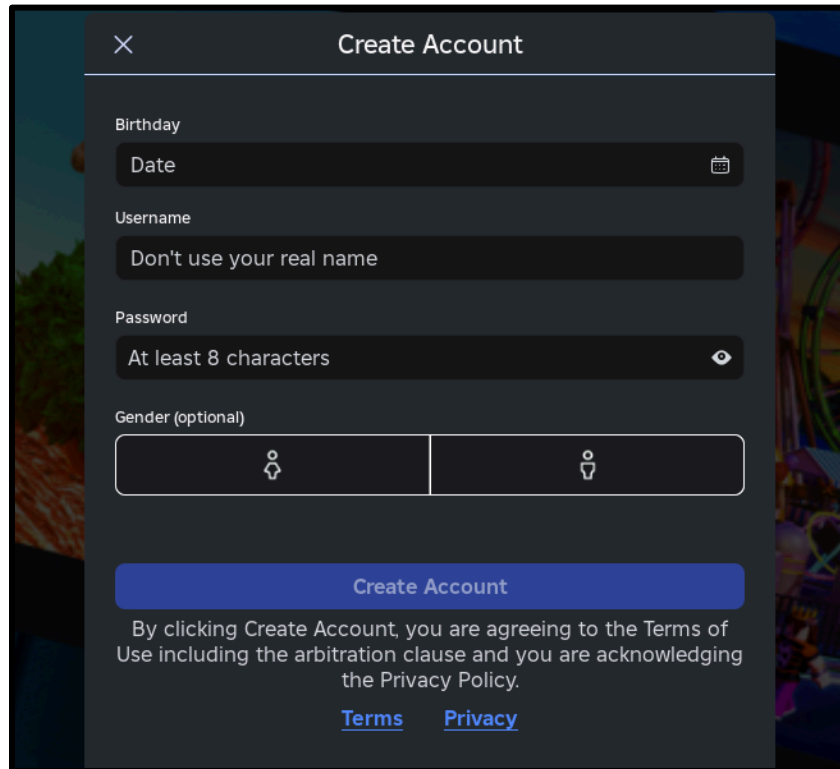
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<sup>6</sup> Roblox Corp., Quarterly Report (Form 10-Q) (Mar. 13, 2021).

<sup>7</sup> Roblox, *Opening Keynotes | RDC23*, YouTube (Sep. 8, 2023), <https://www.youtube.com/watch?v=CwLThCghzA4> (“Roblox Developers Conference 2023 Keynote”).

<sup>8</sup> Roblox, *RDC 2024: New Features and Product Announcements | 2024 Roblox Developers Conference Highlights*, YouTube (Sep. 6, 2024); <https://www.youtube.com/watch?v=HwbcWc2CwnM>.

old boy, a fifteen-year-old girl, and a 47-year-old male.



*Roblox Sign-up Screen, as of Nov. 25, 2025.*

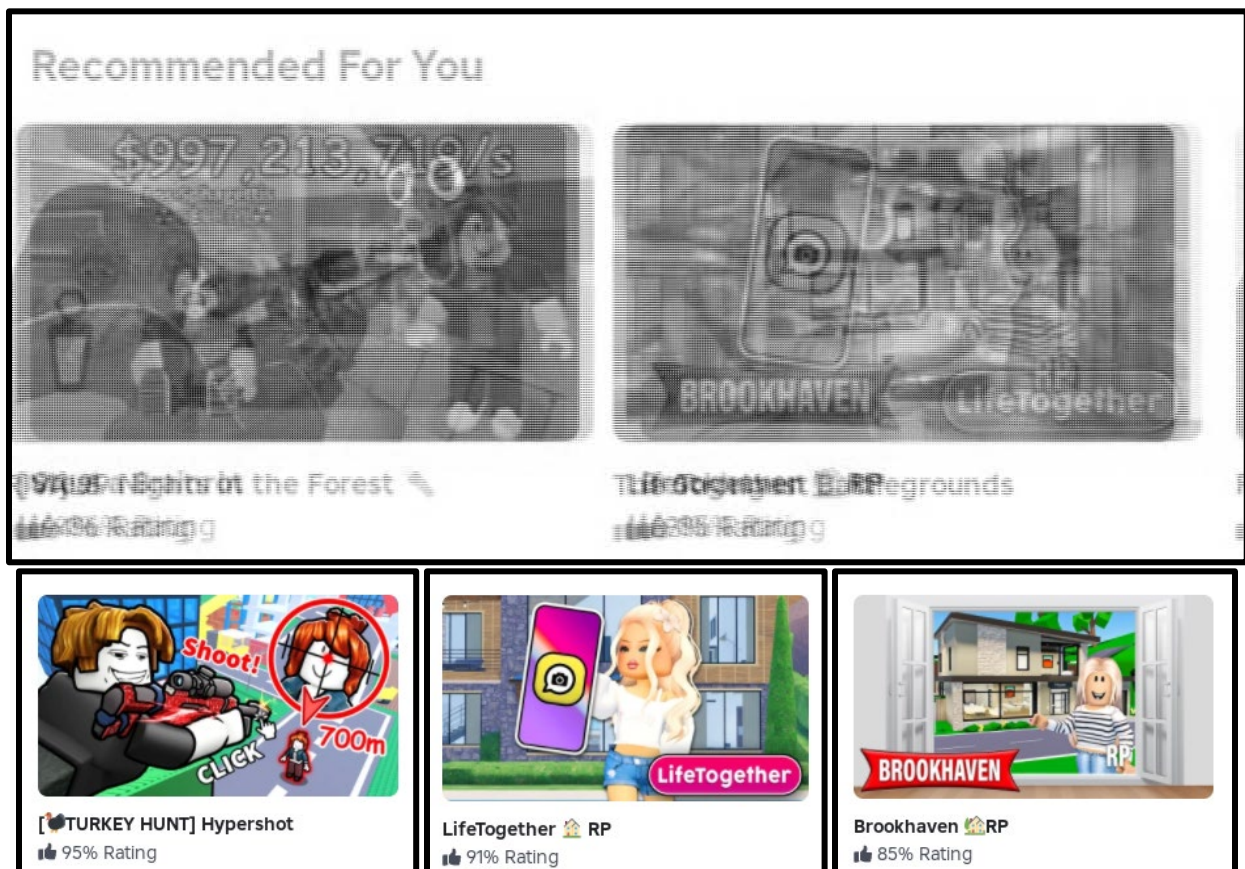
25. Although Roblox states that children must have parental permission before creating an account, nothing prevents children from creating accounts and accessing Roblox without permission. Roblox does nothing to confirm or document that parental permission has been given, no matter how young a child is. Nor does Roblox require a parent to confirm the age that the child provides when creating a Roblox account.

26. Roblox could do more; it chooses not to. Roblox has long had access to biometric age- and identity-verification software, which requires the user to provide a photo of a government-issued ID, along with a real-time “selfie” that Roblox then verifies through artificial intelligence. Roblox already uses this software, purportedly to restrict access to certain games. Yet Roblox does not apply this software to the creation of new accounts. Instead, Roblox continues to rely on self-reported birthdates for age verification at signup, allowing adults to pose as children and children

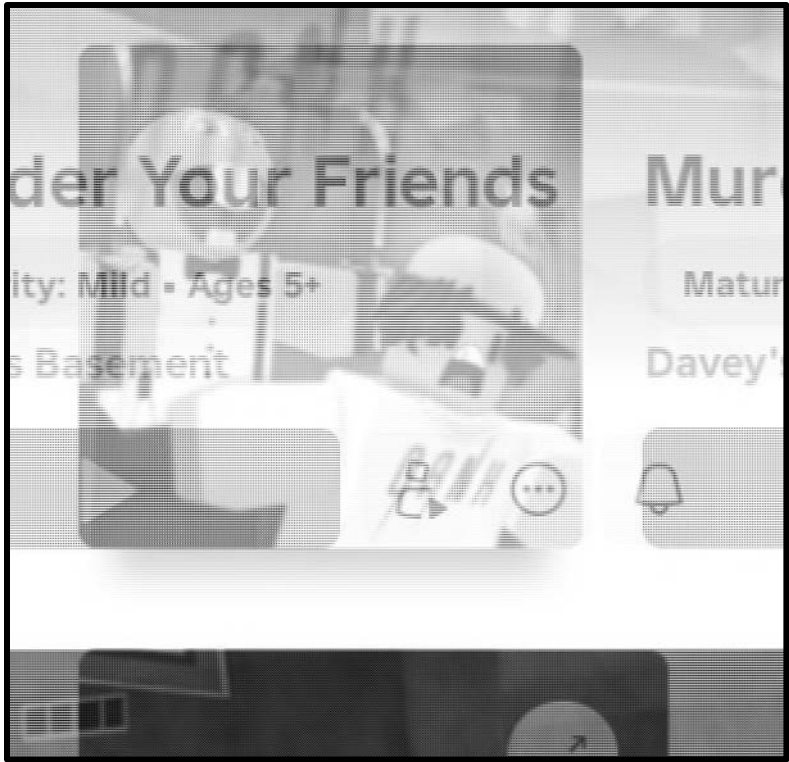
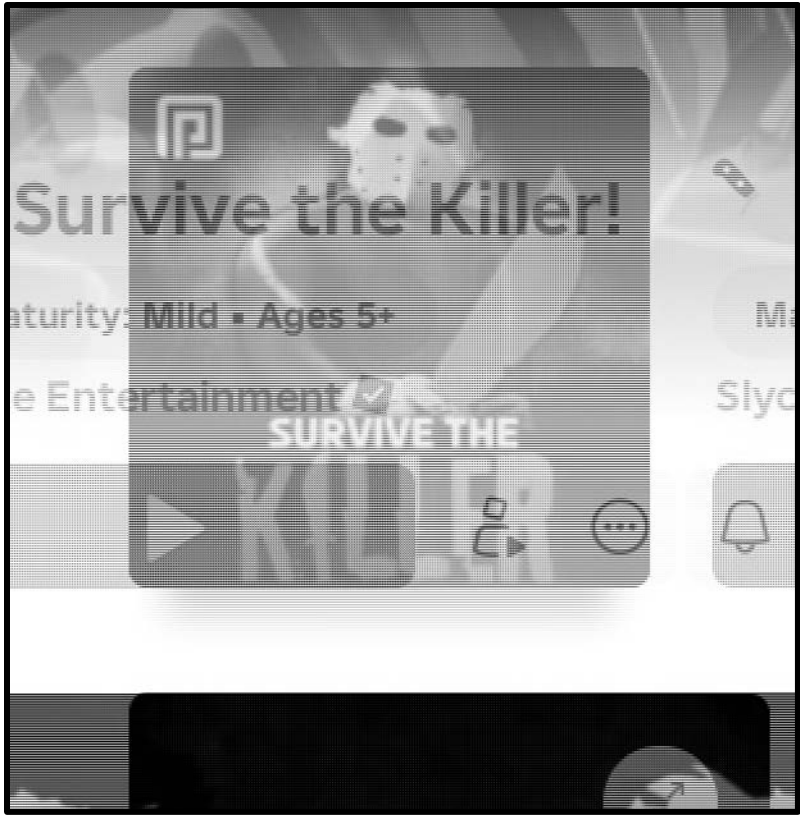
to circumvent the more restrictive controls that would apply if they used their actual ages.

27. After creating an account, the user is assigned a default player avatar—a cartoonish character that represents the user within the Roblox world and games. The user can then play millions of games. There are currently more than 40 million games, which Roblox calls “experiences,” available on Roblox.

28. These games are sorted into different genres/categories, such as Sports, Role-Playing Games, Fighting, First Person Shooters, Fashion, Horror, Comedy, Military, and Naval. The games recommended to a user will vary based on the age the user entered when generating their account and Roblox’s algorithm that recommends games to the user.



*Examples of games available to a new, 8-year-old user on Roblox, as of Nov. 25, 2025.*





*Games available for 5+ year old users on Roblox, as of Dec. 8, 2025.*

29. Of course, Roblox has its own interests in adding users—namely, users’ data, the coin of the realm for modern tech companies that is sold for advertising and other purposes. On information and belief, Roblox begins tracking users’ identifying information as soon as users download the Roblox app to their devices, before they even create a Roblox account or read Roblox’s terms of service. For children under age 13, that means Roblox begins collecting these users’ data before providing parents with notice, or with the ability to authorize collection before Roblox can collect these users’ identifying information, in contravention to the requirements of the Children’s Online Privacy Protection Act (“COPPA”), 15 U.S.C. § 6502, 16 C.F.R. § 312.4.

30. Roblox also utilizes individual “Player Tokens,” which tie directly to all users’ accounts while on the platform. Roblox knows that this allows for child users to be identifiable by predators and targeted across the platform. Because Roblox does not change these tokens as users switch between games on the platform, predators can match a child to his or her token and then

stalk them across the platform.

31. Meanwhile, Roblox has monetized the very interactions that put children at risk by making its virtual currency, Robux, an indispensable part of the platform. Robux, which are used for in-app purchases, cost real money. Children frequently become obsessed with purchasing or otherwise obtaining Robux to buy items for their avatars and to spend in their favorite Roblox games. In Roblox's Avatar Store, the company sells rare items, like particular avatar hairstyles, at astronomical prices, because children will purchase them to keep up with or outdo their peers. Roblox also offers Robux gift cards that anyone can purchase and send to any user. Children often tell others, including strangers, that they will do "Anything for Robux."

32. Since children lack the financial wherewithal to buy enough Robux, predators have taken advantage and coerced young users into trading Robux for sexually explicit images. Roblox is well aware of this phenomenon. Rather than prevent it, Roblox takes a cut of the transaction.

33. Roblox's user numbers bear out its popularity and accessibility. Child usership exploded during the COVID-19 pandemic, when kids were confined to their homes and glued to their devices. By September 2020, roughly 30 million people, more than half of them under age 13, were on Roblox daily, making it the world's biggest recreational zone for kids.

34. That growth has continued unabated. In its latest Annual Report (for 2024–25), Roblox reported an average of 82.9 million daily active users, with 20% under age 9; 20% aged 9 to 12; 16% aged 13 to 16; and 44% aged 17 or older.<sup>9</sup>

35. Today, Roblox is the most downloaded online game globally, with the average user

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<sup>9</sup> Roblox Corp., 2025 Proxy Statement and 2024 Annual Report (May 29, 2025), <https://www.sec.gov/Archives/edgar/data/1315098/000155837025004965/rblx-20250331xars.pdf>.

spending 139 minutes a day on the app.<sup>10</sup>

## II. Roblox Knowingly Endangers Children on the App and in Real Life.

36. Roblox’s own developers admit that Roblox is unsafe for children.<sup>11</sup> 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 has consistently ignored. For example:

- a. “Unfortunately, it is worse now due to Roblox’s moderation being so abysmal and Roblox being a far more widespread platform. Creeps flock aplenty when before the creep: kid ratio was much much lower . . . . Roblox has no interest in actually fixing the issues so long as the bad press doesn’t end up viral.”<sup>12</sup>
- 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.”<sup>13</sup>
- 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.”<sup>14</sup>
- 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.”<sup>15</sup>

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<sup>10</sup> *Research by App Category – Gaming*, Qustodio, <https://www.qustodio.com/en/the-digital-dilemma/gaming/> (last visited Dec. 5, 2025).

<sup>11</sup> Edwin Dorsey, *Problems at Roblox (RBLX) #5*, The Bear Cave (Oct. 17, 2024), <https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

37. These statements, coming from people familiar with Roblox’s operations, describe a platform where harmful content flourishes, predators thrive, and Roblox repeatedly fails to act—even in the face of widespread and urgent warnings.

**A. Roblox prioritizes growth at the expense of child safety.**

38. The reason that Roblox is overrun with predators is simple: Roblox prioritizes user growth over child safety. More users mean more revenue, which can mean more profits.

39. Roblox has therefore focused on growth above all else. Recognizing that children have more free time, less-developed cognitive functions, and diminished impulse control, Roblox has exploited their vulnerability to lure them to its app, deliberately targeting and capitalizing on kids by positioning itself as a safe place to learn and play.

40. This business model attracted significant venture-capital funding from big-name investors like Kleiner Perkins and Andreessen Horowitz, which only added more pressure to grow and monetize Roblox’s user base. In 2021, Roblox went public at a valuation of \$41 billion, which only increased that pressure. Like many unprofitable companies, Roblox prioritized rapid growth in revenue and user engagement metrics—like new user acquisition, daily active users, and average hours spent on the app—on the theory that profitability would follow once the business achieved sufficient scale.<sup>16</sup>

41. Roblox saw child safety as a hindrance. As one former Roblox employee explained: “You’re supposed to make sure that your users are safe but then the downside is that,

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<sup>16</sup> After listing on the New York Stock Exchange, Roblox CEO David Baszucki told CNBC, “Roblox has been growing for 15 years . . . That’s a long-term growth path, and we believe that continues forward, even after Covid.” Ari Levy & Jessica Bursztynsky, *Roblox Jumps to \$38 Billion Mark Cap as Public Investors Get Their First Crack at the Popular Kids Game App*, CNBC (Mar. 10, 2021), <https://www.cnbc.com/2021/03/10/roblox-rblx-starts-trading-at-64point50-after-direct-listing.html>. CFO Michael Guthrie added, “As [Covid] restrictions ease, we expect the rates of growth in 2021 will be well below the rates in 2020, however, we believe we will see absolute growth in most of our core metrics for the full year.” *Id.*

if you're limiting users' engagement, it's hurting our metrics. It's hurting the active users, the time spent on the platform, and in a lot of cases, the leadership doesn't want that."<sup>17</sup> That same employee added: "You have to make a decision, right? You can keep your players safe, but then it would be less of them on the platform. Or you just let them do what they want to do. And then the numbers all look good and investors will be happy."<sup>18</sup>

42. Roblox deprioritized safety measures so that it could report strong growth numbers to Wall Street. Among several other failures, *see infra* Part II.B, Roblox executives rejected employee proposals for parental-approval requirements that would have protected children on the platform.<sup>19</sup> Employees also reported feeling explicit pressure to avoid any changes that could reduce engagement, even when those changes would protect children from predators.<sup>20</sup>

43. These decisions also reduced the company's safety expenses as a percentage of its revenue—a key metric for Wall Street, which apparently viewed trust-and-safety costs as harmful to Roblox's stock performance. Barclays, for example, described increased safety costs as a "negative" in Roblox's quarterly earnings and identified the "downside case" for Roblox's stock as "additional safety investments due to its younger demographic . . . becom[ing] a drag on [earnings] margins."<sup>21</sup>

44. During earnings calls, Roblox has frequently assured investor analysts that it is hyper-focused on reducing its trust-and-safety expenses as a percentage of its revenue, even as the company continues to grow and attract millions of additional users.

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

<sup>18</sup> *Id.*

<sup>19</sup> *Pedophile Hellscape Report*, *supra* note 1.

<sup>20</sup> *Id.*

<sup>21</sup> Ross Sandler, Trevor Young & Alex Hughes, *Back on Track Following the 1H Hiccup*, Barclays (Aug. 1, 2024); Ross Sandler, Trevor Young & Alex Hughes, *Everything Accelerating, Safety & Security a Top Priority*, Barclays (Nov. 1, 2024).

45. For example, on Roblox’s 2023 fourth-quarter earnings call, an analyst praised the “really high level of efficiency” in Roblox’s infrastructure and trust-and-safety expenditures and asked how those figures would evolve over time.<sup>22</sup> Mike Guthrie, Roblox’s CFO, responded that the company’s goal was to keep reducing them: “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.”<sup>23</sup> He added, “[W]e still think there’s more to do there.”<sup>24</sup> At other times, Guthrie has told investors to “look for trust and safety [costs] to scale below linear as we grow”<sup>25</sup> and that Roblox was “quite happy with” trust-and-safety costs growing “at a lower rate than our bookings growth.”<sup>26</sup> In the second quarter of 2024, Roblox CEO Baszucki similarly highlighted that, “[i]mportantly, our infrastructure and trust and safety expenditures were 8% lower year-on-year.”<sup>27</sup>

46. Once Roblox was going public—and already approaching saturation in the market for child users—it added another growth strategy. Now it would try to attract more *adult* users to its “#1 gaming site for kids and teens.”<sup>28</sup>

47. In its public offering filings, Roblox identified “age demographic expansion” as a key strategy, explaining that it planned to develop content that appealed to older users.<sup>29</sup> Beyond user growth, older users offered a distinct financial advantage. Where children’s spending ability

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<sup>22</sup> Roblox Corp., Q4 2023 Earnings Call (Feb. 7, 2024).

<sup>23</sup> *Id.* (emphasis added).

<sup>24</sup> *Id.*

<sup>25</sup> Roblox Corp., Q4 2022 Earnings Call (Feb. 15, 2023).

<sup>26</sup> Roblox Corp., Q3 2022 Earnings Call (Nov. 8, 2023).

<sup>27</sup> Roblox Corp., Q2 2024 Earnings Call (Aug. 1, 2024).

<sup>28</sup> *What Is Roblox*, Roblox,

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

<sup>29</sup> Roblox Corp., S-1 (Securities Registration Statement), at 7 (Nov. 19, 2020).

is more constrained, older users “have more direct control over their spend,” “monetize better,” and are far more lucrative—an outcome Roblox predicted when it started to target older users.<sup>30</sup>

48. Roblox’s executives touted this “aging up” strategy,<sup>31</sup> highlighting its progress on every quarterly earnings call until the second quarter of 2023, when CEO Baszucki declared that Roblox had achieved its goal: “We’re no longer talking about aging up. We are a platform for all ages.”<sup>32</sup> He also revealed that developers had started to “build specific 17-plus experiences.”<sup>33</sup> Wall Street investment banks praised these aged-up games as a promising indicator of “potential sustainable growth tailwinds for Roblox.”<sup>34</sup>

49. With aging up came more adult-friendly features—and more dangers for children. At Roblox’s annual Developer Conference in 2023, CEO Baszucki encouraged developers to create experiences for older audiences and announced new features designed to appeal to older users, including the use of real names, screen capture and sharing capabilities, video calls, and relaxed chat moderation.<sup>35</sup>

50. At the same time, Roblox imposed no meaningful restrictions on adult users’ ability to contact child users or limits on access to the mature content that it solicited from developers to attract older users. When an investor analyst asked about games limited to ages 13 and up, Roblox CEO Baszucki was blunt: “I want to highlight right now that *we don’t have any*

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<sup>30</sup> Roblox Corp., Q2 2022 Earnings Call (Aug. 10, 2022).

<sup>31</sup> At the company’s inaugural conference with an investment bank in September 2021, Roblox CFO Guthrie noted that Roblox had achieved “very good penetration of nine to twelve year-olds” and was focused on adding users over the age of 13. One plan was to “improve the search algorithms such that older users were finding older content,” or content tailored to their age-related demographic. *See Goldman Sachs Communicopia*, Roblox (Sep. 9, 2021), <https://ir.roblox.com/events-and-presentations/events/event-details/2021/Goldman-Sachs-Communicopia/default.aspx>.

<sup>32</sup> Roblox Corp., Q2 2023 Earnings Call (Aug. 9, 2023).

<sup>33</sup> Roblox Corp., Q2 2023 Earnings Call (Aug. 9, 2023).

<sup>34</sup> Benjamin Black et al., *Bookings Back on Track*, Deutsche Bank (Nov. 4, 2024).

<sup>35</sup> Roblox Developers Conference 2023 Keynote, *supra* note 7.

*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.*”<sup>36</sup> Roblox also continued to allow users to set up accounts without any type of age verification.<sup>37</sup>

**B. Roblox refuses to implement readily available child-safety measures.**

51. In its drive to cut trust-and-safety costs, Roblox has opted not to implement several industry-standard measures that would have kept child users safe.

52. Roblox deceives and endangers users as soon as they encounter the app. To signal to parents that the app presents risks for children, Roblox could have placed a higher age rating on the app in the iOS App Store and other app stores. Roblox likewise could have provided clear warnings to parents about the presence of sexual predators on the platform so that parents could make an informed decision about allowing their children on the platform or educate their children about how to stay safe on the platform. Roblox could also have provided clear warnings and safety instructions to children. Roblox chose not to.

53. The problems continue at signup. As noted, Roblox has long had software that could verify the age and identity of new users. Roblox could have used this biometric and age-verification software to implement basic screening measures before allowing new users to create accounts, which could have kept known sexual predators off the app. Instead, Roblox chose to allow users to create accounts without providing so much as their names or email addresses, a policy that not only enables even known predators to create accounts, but also allows predators to create multiple anonymous Roblox accounts.

54. Although Roblox knows that predators routinely operate dozens of accounts at the same time, the company has chosen not to implement the basic practice of blocking redundant

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<sup>36</sup> Roblox Corp., Q3 2021 Earnings Call (Nov. 9, 2021) (emphasis added).

<sup>37</sup> Roblox Corp., Q4 2022 Earnings Call (Feb. 15, 2023).

digital identifiers—such as the unique network addresses that track internet connections (“Internet Protocol” or “IP” addresses) and the permanent hardware identification numbers assigned to devices (“Media Access Control” or “MAC” addresses)—which could prevent predators from creating multiple accounts.<sup>38</sup> Thus, even if a predator is identified and removed from the platform, there is nothing to stop the predator from simply starting a new account and continuing his exploits. Roblox is well-aware of this phenomenon, and yet still does not employ measures to stop it from happening. Similarly, Roblox has chosen not to require adult users to verify phone numbers, which could impose another barrier to a predator seeking to create multiple accounts with the same underlying user information.

55. Roblox could at least have required children to provide their names and email addresses and to obtain parental approval before creating an account, a fundamental protection against predators. Again, it refused to do so. This decision allowed the company to bypass certain protections that are mandated by federal law and designed to protect children.

56. As noted, COPPA prohibits companies like Roblox from collecting, using, or disclosing the personal information of children under 13 without adequate notice and verifiable parental consent. COPPA was enacted because Congress recognized the heightened vulnerability of children on the internet. As the Federal Trade Commission (“FTC”) observed, children under age 13 lack the capacity to “understand fully the potential serious safety and privacy implications” of sharing their personal information.<sup>39</sup> The FTC has outlined several clear and acceptable methods for obtaining verifiable parental consent.<sup>40</sup>

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<sup>38</sup> *Id.*

<sup>39</sup> Federal Trade Commission, *Privacy Online: A Report to Congress* 6 (1998), <https://www.ftc.gov/sites/default/files/documents/reports/privacy-online-report-congress/priv-23a.pdf>.

<sup>40</sup> These include: (a) providing a form for parents to sign and return; (b) requiring the use of a

57. Rather than implement any of those methods, Roblox apparently avoids requesting names or email addresses in a misguided effort to bypass the parental-consent requirement altogether. In fact, former employees have revealed that Roblox considered requiring verifiable parental consent but ultimately declined out of fear that such requirements might drive users away.<sup>41</sup> Hence the alarming ease of creating a Roblox account, which requires less than sixty seconds and no parental oversight.<sup>42</sup>

58. Roblox has also chosen not to require users to verify their ages by uploading pictures of either their IDs or their parents' IDs, a practice that many similar apps employ. Doing so would have restricted the content available to young users and prevented predators from easily misrepresenting their age, which is often their approach to targeting and grooming children. As one father told the press after seeing other users solicit his avatar for sex: "There is nothing to stop adults going on there and pretending they're kids."<sup>43</sup>

59. Unlike Roblox, many digital service companies have adopted separate platforms for children of young ages, including, for example, Amazon and Netflix. Roblox likewise could have created a separate, gated platform for younger child users that excludes adults. By simply

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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; or (f) verifying a parent's photo-ID by comparing it to a second photo using facial recognition technology. *See Complying with COPPA: Frequently Asked Questions*, Federal Trade Commission (July 2020), <https://www.ftc.gov/business-guidance/resources/complying-coppa-frequently-asked-questions>.

<sup>41</sup> *Pedophile Hellscape* Report, *supra* note 1.

<sup>42</sup> Scott Tong & James Perkins Mastromarino, *Roblox Attempts to Bar Child Predators as Short Sellers Target the Popular Game Platform*, WBUR (Oct. 21, 2024), <https://www.wbur.org/hereandnow/2024/10/21/roblox-child-predators-safety>.

<sup>43</sup> Carl Stroud, *Horrorified Dad Found Sick Messages from Paedo Predator in His Eight-Year Old Son's Roblox iPad Game*, The Sun (Feb. 15, 2017), <https://www.thesun.co.uk/news/2872376/horrified-dad-found-sick-messages-from-paedo-predator-in-his-eight-year-old-sons-roblox-ipad-game/>.

using the facial recognition software that it already has, Roblox could have created the safe play space that it pretends to provide.

60. The problems continue in the app. Roblox knowingly designed its platform so that anyone can easily communicate with children, creating a virtual world where predators can freely target and groom child users. Until November 2024, Roblox configured its app to default to settings that allow adult strangers to “friend” and chat with children of any age via direct (*i.e.*, private) messages. And even without being “friends,” adults could chat with a child of any age through messages within a Roblox game. Although Roblox did offer some adjustable parental controls for users under age 13, children could bypass those controls simply by creating an alternate account falsely identifying as a 13+-year-old user—or, even more simply, by disabling the parental controls themselves.<sup>44</sup>

61. Although adults now cannot directly message children below age 13 under Roblox’s default setting, Roblox still does nothing to prevent children that young from creating accounts with fake 13+ birthdates, thereby gaining full access to Roblox’s direct-messaging options. Nor does anything prevent adults from entering fake birthdays and posing as children to communicate with young users. Roblox still relies on self-reported birthdates for age verification. Moreover, adult users have still been able to send direct messages to children under age 13 within games. And children aged 13 or over remain fully vulnerable to receiving friend requests, and in-game direct messages, from adult strangers.

62. These features contrast sharply with other gaming products, like Nintendo, which use preprogrammed dialogue options to tightly control user interactions.<sup>45</sup> By adopting a similar

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<sup>44</sup> Eli Tan, *Roblox Sued for Wrongful Death After Teenagers Suicide*, N.Y. Times (Sep. 12, 2025), <https://www.nytimes.com/2025/09/12/technology/roblox-lawsuit-child-safety.html>.

<sup>45</sup> Carville & D’Anastasio, *supra* note 2.

approach, Roblox could have significantly reduced—if not eliminated—the grooming and child abuse that its app facilitates, because predators would not have been able to solicit any personal information from or send any coercive or sexually suggestive messages to children.

63. Another easy-to-implement safety feature would be pop-up safety notices within chats and games to warn users about their behavior or about the dangerous behavior of others. But Roblox executives rejected this change, too.<sup>46</sup>

64. Roblox has also knowingly enabled the common practice where a predator meets and grooms a child on Roblox and then moves interactions with that child to a messaging app, often the Discord app. Indeed, Roblox has encouraged users to communicate on Discord by allowing them to include their Discord usernames in their Roblox profiles.<sup>47</sup> Roblox knows about this predatory practice and the risks it presents to children (and, ultimately, Roblox’s business). Yet it continues to allow Discord links in Roblox profiles.

65. Roblox has further endangered children with live-chat features.

66. Roblox released a “Voice Chat” feature in 2021 without any guardrail preventing adult predators from speaking to children. This feature, called “Spatial Voice,” purportedly offered verified players who were 13+ years old the ability to communicate with one another in Roblox experiences. Beyond a requirement that a user be 13+ and verified, the feature included no safety measures to protect children from strangers speaking to them in games. Roblox also failed to create the capability for moderators or its safety team to review those inappropriate communications. At

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<sup>46</sup> *Id.*

<sup>47</sup> TechTutor, *How to Add Discord to Roblox Profile*, YouTube (Aug. 27, 2024), <https://www.youtube.com/watch?v=tOd-W3kdm44>.

the same time, Roblox asserted publicly that “[a]ll chat on Roblox is filtered to prevent inappropriate content.”<sup>48</sup>

67. That was false. Roblox employees knew that they did not have the capability to investigate abuses of Voice Chat, including instances when predators used the feature to speak with children. Thus, adult predators on Roblox had free rein to voice chat with young users without any filters or moderation, and even if a user reported inappropriate behavior, Roblox could not review the offending communications.

68. Roblox also asserted that Voice Chat was only available to verified users who were at least 13-years-old.<sup>49</sup> That, too, was false. Even if users under the age of 13 could not themselves speak in the game, they were still subjected to the speech of others, including predators.

69. This deception caused real-world harm. For example, a father of two young girls contacted Roblox after his daughters met someone on the platform who directed them to Discord, where they were shown pornography. The older male switched from text to voice chat, which shielded his communications from moderation or review. That same user engaged in a consistent pattern of inviting numerous children to private servers/sex games, directing them off-platform, and grooming them.

70. Beyond the risks to under-13 players, Voice Chat also threatened young users aged 13–17. When Voice Chat launched in full, all users 13+ who had verified their phone or ID were automatically opted into the voice feature. At that moment, every 13 year old was at risk of being targeted by adult predators. Yet Roblox had no ability to moderate these communications. Young

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<sup>48</sup> *Safety Features: Chat, Privacy & Filtering*, Roblox (Nov. 15, 2021), <https://web.archive.org/web/20211115003245/https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering>.

<sup>49</sup> Rob Leane, *Roblox Voice Chat: Release Date Details, News & How Spatial Voice Works*, Radio Times (Nov. 9, 2021), <https://www.radiotimes.com/technology/gaming/roblox-voice-chat/>.

users were offered no protection from grooming over voice. And while minor users retained the ability to report abusive or offensive behavior directed at them, Roblox knows that most instances of grooming are never reported.

71. Roblox has long known that the platform’s voice moderation capabilities were limited and could not stop adults from speaking to children. For the most part, Roblox relied on user reporting of inappropriate conduct. And while Roblox used artificial intelligence to moderate some language in voice chats, that did not include efforts to move minor users off-platform. And even where users were caught violating Roblox policies, they would face minimal, if any, repercussions.

72. Roblox followed up by introducing voice calls in November 2023. Called “Roblox Connect,” this call feature allows users to have a conversation through their avatars in real time. Concerns were immediately raised. One user emphasized: “This is a bad idea Roblox, and especially on your platform because this is where most predators are coming from, and it makes it way easier for predators to prey on children.”<sup>50</sup>

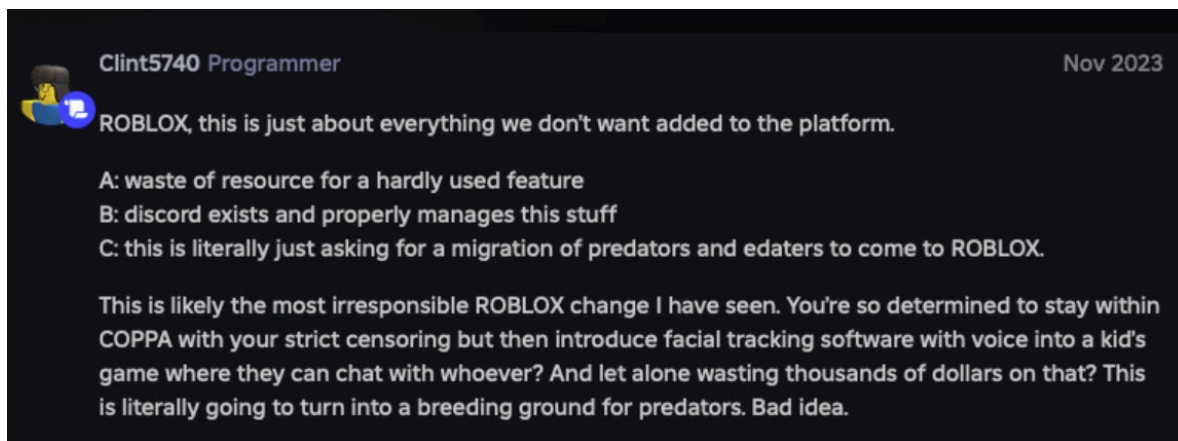
73. Roblox also knew that this call feature would endanger children because another company, Omegle, had implemented a similar feature with disastrous consequences. From 2009 to 2023, Omegle operated a website that allowed users, including children, to have anonymous chats with strangers. In March 2010, Omegle introduced a video-chat feature, and the website soon became infamous for exposing minors to explicit material, predators, and exploitation, leading to criminal child-pornography cases and other incidents. In November 2023, Omegle announced that it would cease operations. As its founder explained: “[T]here can be no honest

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<sup>50</sup> Josh Taylor, *Roblox Under Fire After Adding Controversial Voice Call Feature*, Dexerto (Nov. 15, 2023), <https://www.dexerto.com/roblox/roblox-under-fire-after-adding-controversial-voice-call-feature-2384564/>.

accounting of Omegle without acknowledging that some people misused it, including to commit unspeakably heinous crimes.”<sup>51</sup> He thanked one survivor for “opening my eyes to the human cost of Omegle.”<sup>52</sup> That was the same month that Roblox launched Roblox Connect.

74. After launch, Roblox game developers took to Roblox’s “Developer Forum” to question the feature’s necessity—and safety. For example, one developer put Roblox on notice of the dangers in stark terms:



*Developer Post to Roblox Developer Forum about Roblox Connect.*<sup>53</sup>

75. Even the safety measures that Roblox purportedly has taken have been plainly inadequate. Despite all the above failures, Roblox aggressively markets and promotes itself as an “industry leader” in child safety.<sup>54</sup> Central to this narrative are Roblox’s “accomplishments” of investing in artificial intelligence and machine-learning systems supposedly designed to scan and monitor all communications on the app and to prevent users from sharing inappropriate content and personally identifiable information.<sup>55</sup>

<sup>51</sup> Omegle, <https://www.omegle.com/> (last visited Dec. 5, 2025).

<sup>52</sup> *Id.*

<sup>53</sup> @Clint5740, Roblox Developer Forum (Nov. 14, 2023, 2:12 p.m.), <https://devforum.roblox.com/t/the-future-of-immersive-communication-on-roblox/2701137/52>.

<sup>54</sup> Roblox Corp., Q1 2021 Earnings Call (May 11, 2021).

<sup>55</sup> *Safety Features: Chat, Privacy & Filtering*, Roblox, <https://web.archive.org/web/20240714>

76. Yet these filters have inexplicable omissions. Although Roblox blocks users from using certain words like “Snap” and “Snapchat”—demonstrating its awareness of the dangers of facilitating off-app communications—it allows obvious workarounds, like the use of the ghost emoji (👻), which is a recognized symbol for Snapchat, or alternative names like “Snappy” or “apchat.” Similarly, though the word “Discord” is blocked, users can still refer to it with the disc emoji (🌀) or alternative names like “iscord” or “cord.”<sup>56</sup> And though Roblox prevents users from sharing their phone numbers in numerical format, it does nothing to stop them from spelling the numbers out.<sup>57</sup>

77. Roblox’s selective filters also fail to protect users on the Roblox platform itself. Roblox attempts to police the word “condo,” a reference to a popular type of Roblox sex game. *See infra* Part II.C. As soon as Roblox removes one game, however, its ineffective safeguards allow the same game to be reuploaded almost immediately from a new account. External groups have capitalized on Roblox’s weak moderation by guiding predators to these reuploaded games. A *Fast Company* report easily identified 150 Discord groups dedicated to exploiting Roblox’s lack of robust enforcement.<sup>58</sup> And Roblox knew that hundreds of thousands of these games remained available on the platform every day.

78. Along with its ineffective technology, Roblox employs an inadequate number of human moderators. With only about 3,000 moderators, Roblox pales in comparison to another popular online platform which, despite having only three times the number of users, employs

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130904/<https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering> (archived July 14, 2024).

<sup>56</sup> Edwin Dorsey, *supra* note 11.

<sup>57</sup> *Id.*

<sup>58</sup> 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>.

more than ten times the number of moderators.<sup>59</sup> Roblox claims that “[y]ou really can’t judge the quality of these moderation systems by the number of people.”<sup>60</sup> But reality tells a different story. Roblox’s moderators, many of them overseas contractors, report being overwhelmed by an unmanageable volume of child-safety reports, making it impossible to address all concerns effectively and leaving countless safety issues unresolved.<sup>61</sup> As a result, users and content that should have been removed years ago remain on the platform. And predators remain free to roam.

**C. Roblox is overrun with depraved sexual content that in turn makes children more susceptible to grooming.**

79. Roblox’s active disregard for child safety has had predictable results.

80. In 2018, two male Roblox avatars violently raped a seven-year-old girl’s avatar on a playground in a Roblox game.<sup>62</sup> The girl’s mother, who witnessed the incident, said that “I never in my wildest dreams would’ve ever imagined that I would have to talk with my seven-year-old about rape.”<sup>63</sup> This is only one of numerous reported rapes of children’s Roblox avatars.

81. Roblox also hosts thousands of games that center on simulated sexual activity—and that are fully accessible to very young children. As just a few examples, children can play in “condo games,” which are predatory digital environments (*e.g.*, houses) where users can remove their avatars’ clothing and engage in disturbing sexual activities.<sup>64</sup> Children can access virtual strip

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<sup>59</sup> Carville & D’Anastasio, *supra* note 2.

<sup>60</sup> Scott Tong & James Perkins Mastromarino, *Roblox Chief Safety Officer on New Safety Features, Past Cases of Child Abuse on the Platform*, WBUR (Nov. 18, 2024), <https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features>.

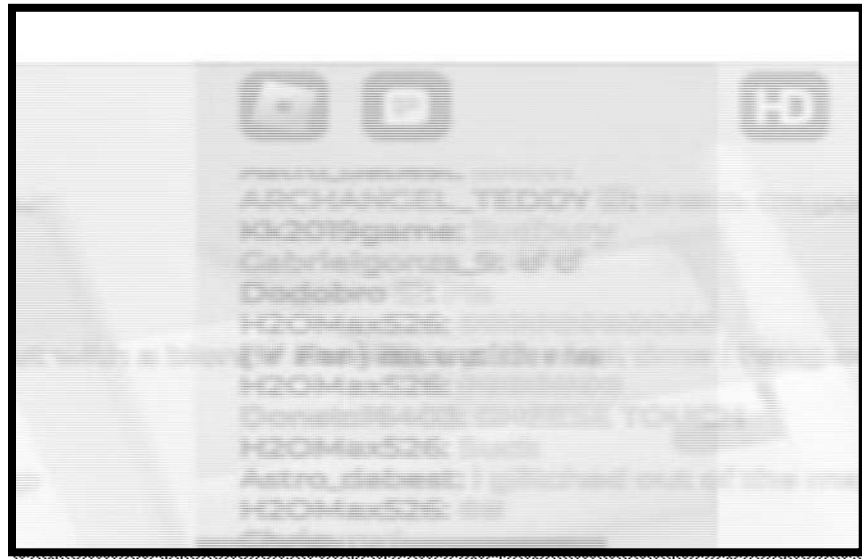
<sup>61</sup> Carville & D’Anastasio, *supra* note 2.

<sup>62</sup> Savannah Levins, *North Carolina Mom Outraged After Roblox Game Depicts Violent Acts, Including Rape*, WFMYNews2 (June 30, 2018), <https://www.wfmynews2.com/article/news/local/2-wants-to-know/north-carolina-mom-outraged-after-roblox-game-depicts-violent-acts-including-rape/83-569498171>.

<sup>63</sup> *Id.*

<sup>64</sup> EJ Dickson, *Inside the Underground Strip-Club Scene on Kid-Friendly Gaming Site Roblox*, Rolling Stone (Sep. 12, 2021), <https://www.rollingstone.com/culture/culture-features/roblox-virtual-strip-clubs-condo-games-sex-1197237/>.

clubs, where child avatars perform sexually explicit acts, like giving lap dances to patrons.<sup>65</sup> And children as young as 9 years old could play games like “Public Bathroom Simulator Vibe,” where users simulated sexual activity in virtual bathrooms.<sup>66</sup>



*Roblox’s Public Bathroom Simulator Game is rated ages nine and up and allows users to simulate sexual activity.*<sup>67</sup>

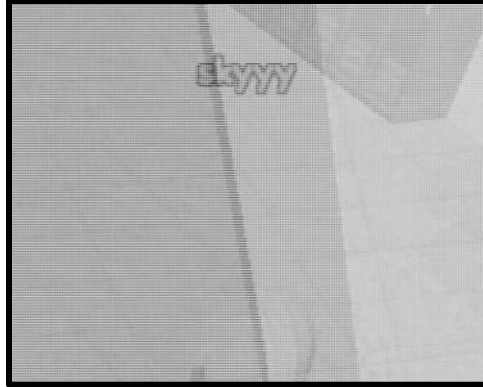
82. Although the “Public Bathroom Simulator Vibe” game was removed from Roblox in June 2025 after the Attorney General’s investigation was launched, similar roleplay games have continued to proliferate across Roblox. While logged into Roblox purporting to be an eight-year-old boy, an investigator in the Attorney General’s Office identified multiple roleplay games with in-game chat capabilities. Immediately upon entering a game called “Boys and Girls Highschool RP,” which is rated for “Ages 5+,” the eight-year-old avatar encountered a scantily-clad avatar.

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<sup>65</sup> *Id.*

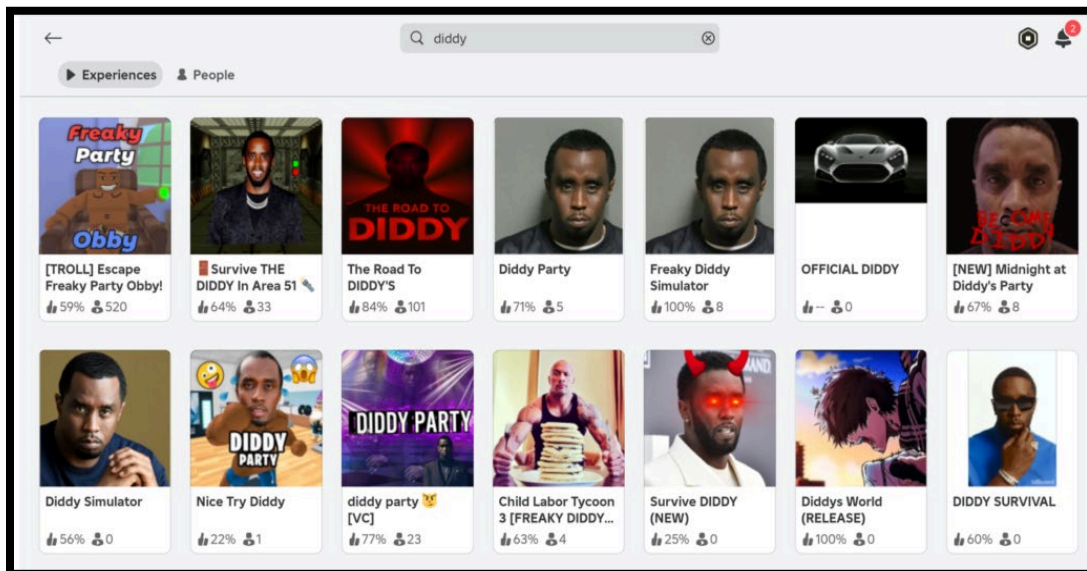
<sup>66</sup> *Pedophile Hellscape Report, supra note 1.*

<sup>67</sup> *Id.*



Screenshot from “Boys and Girls Highschool RP” experience, as of Dec. 5, 2025.

83. The *Pedophile Hellscape* Report exposed a multitude of other Roblox games that trivialize and gamify serious criminal conduct, including rape. The report confirmed, for example, that Roblox actively hosted over 600 “Diddy” games. In September 2024, music mogul Sean “Diddy” Combs was indicted on charges of prostitution and sex trafficking of minors at now-notorious “freak-off” parties, which allegedly involved forced drug use, violent assaults, and victims as young as ten years old. The Roblox games had titles like “Survive Diddy,” “Run from Diddy Simulator,” and “Diddy Party.”



Examples of Roblox games modeled after Diddy’s sex trafficking ventures.<sup>68</sup>

<sup>68</sup> *Id.*

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



*Example of Roblox game modeled after Jeffrey Epstein’s sex trafficking ventures.<sup>69</sup>*

85. Roblox is fully aware that these games pervade its app. Leaked internal documents reveal that Roblox monitored this type of content, rather than try to control or eliminate it, and made decisions about, *e.g.*, “[h]ow big of a ‘bulge’” was acceptable.<sup>70</sup>

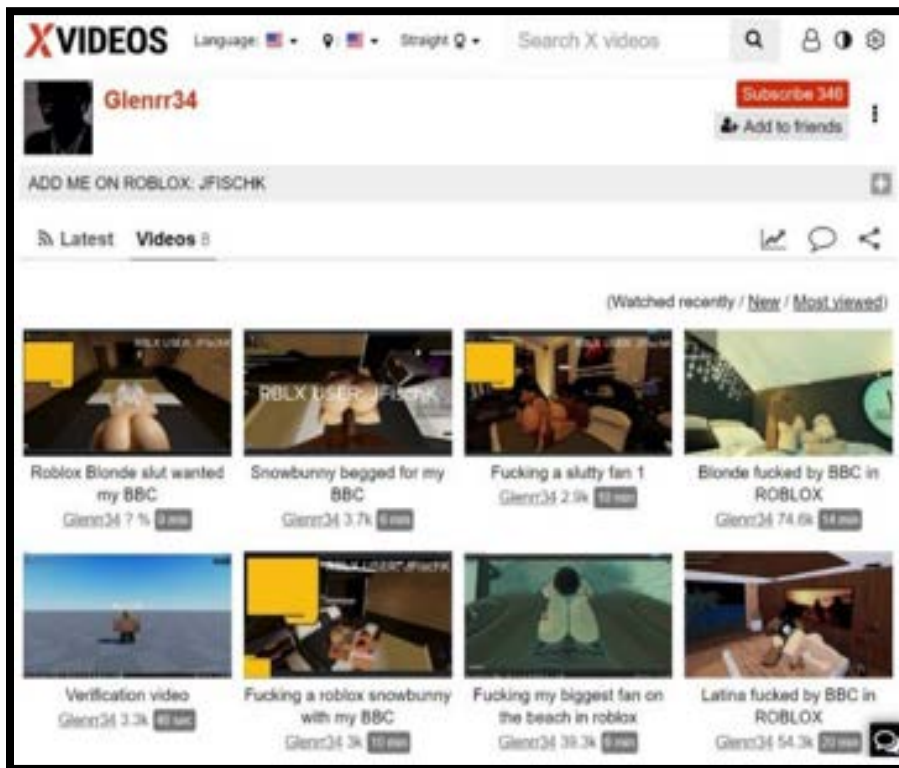
86. Roblox also knowingly facilitates the creation and distribution of pornography by providing users with tools and software designed to make virtual sex videos between Roblox avatars. Videos created on the Roblox app are clearly marked with the .rbxl file extension,

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<sup>69</sup> *Id.*

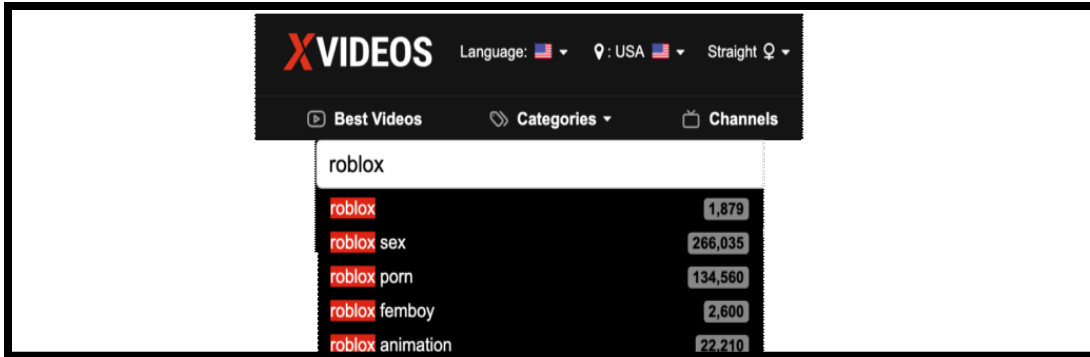
<sup>70</sup> Joseph Cox & Emanuel Malberg, *Leaked Documents Reveal How Roblox Handles Grooming and Mass Shooting Simulators*, *Vice* (Aug. 1, 2022), <https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/>.

Roblox's proprietary file format. These videos have then been posted on pornography websites, e.g., XVideos, where Roblox users also solicit other users to simulate sexual acts within seemingly innocuous games—like Brookhaven, which is one of Roblox's most popular experiences and is available to all users, regardless of age.

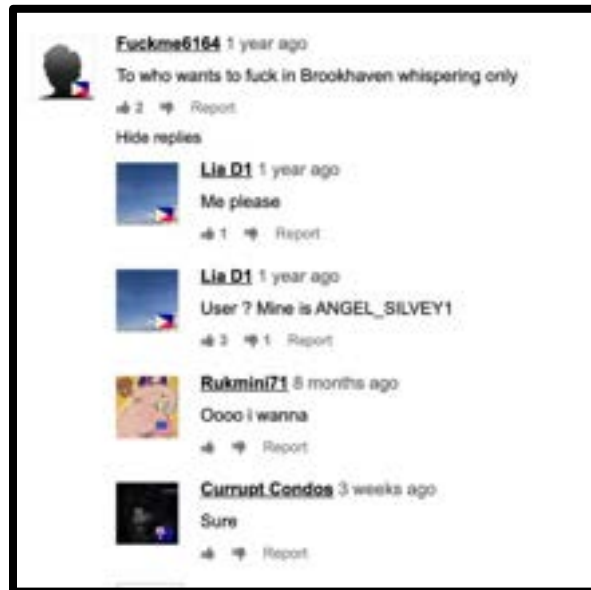


*This Roblox user advertised their Roblox account on XVideos, a porn website, where the user had uploaded videos of their avatar having sex with other Roblox users.<sup>71</sup>*

<sup>71</sup> Pedophile Hellscape Report, *supra* note **Error! Bookmark not defined.**



*Searching “Roblox” on XVideos, a porn website, yields more than 250,000 results.<sup>72</sup>*

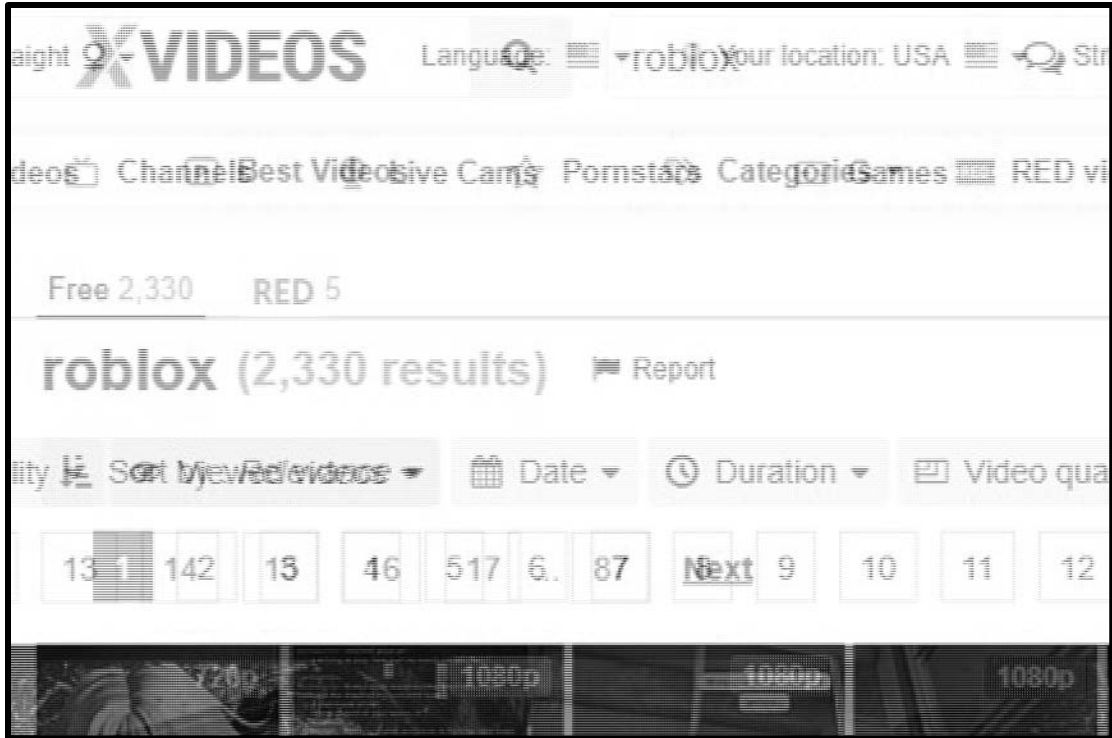


*The comment section on a Roblox porn video on XVideos. Brookhaven is one of Roblox’s most popular games and is available to users of all ages.<sup>73</sup>*

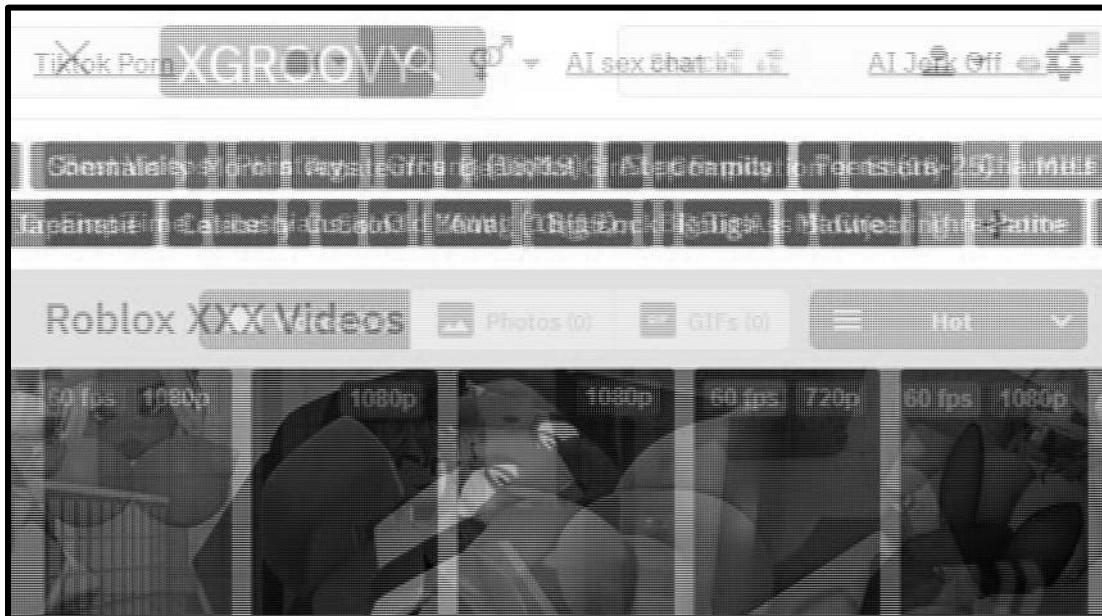
87. Videos like this are uploaded across various porn websites, sometimes garnering millions of views.

<sup>72</sup> *Id.*

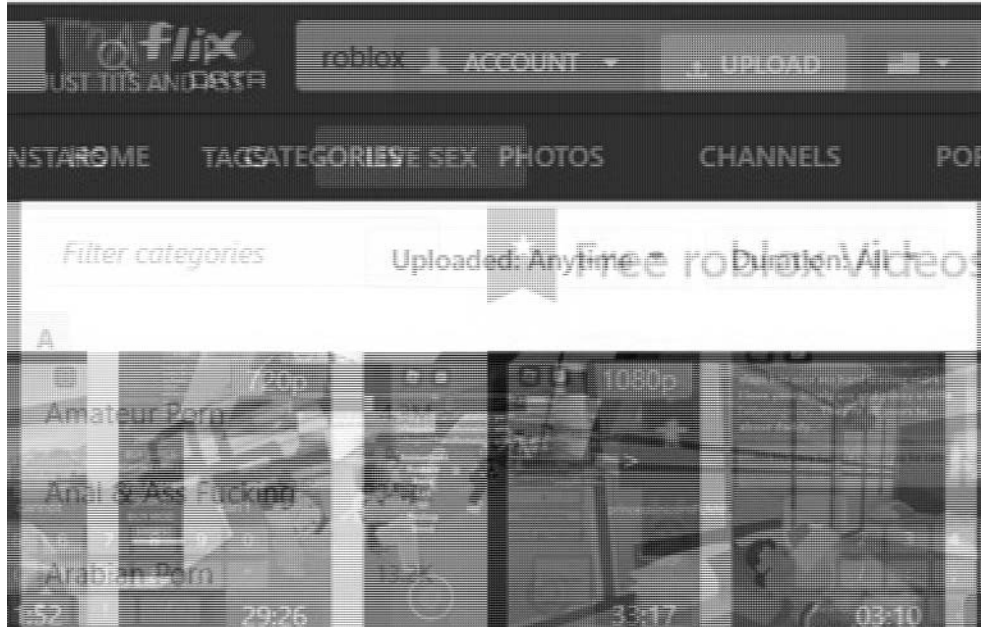
<sup>73</sup> *Id.*



*XVideos Roblox videos, as of Nov. 24, 2025.*



*XGroovy Roblox videos, as of Nov. 24, 2025.*



*TNAFlix Roblox videos, as of Nov. 24, 2025.*

88. This depraved material has devastating effects on children, who are still developing their understanding of social norms and morality. These effects are well-known. One study found that playing games with sexualized content was linked to increased rates of sexual harassment toward female targets, suggesting that such exposure desensitizes players to the real-world consequences of these actions.<sup>74</sup> Another study showed that playing mature-rated games was associated with higher rates of risky sexual behavior years later, highlighting the long-term impact of exposure to sexualized or exploitative content.<sup>75</sup>

89. The interactive nature of video games amplifies this effect. Unlike passive media, video games require active participation in behaviors like simulated harassment or exploitation,

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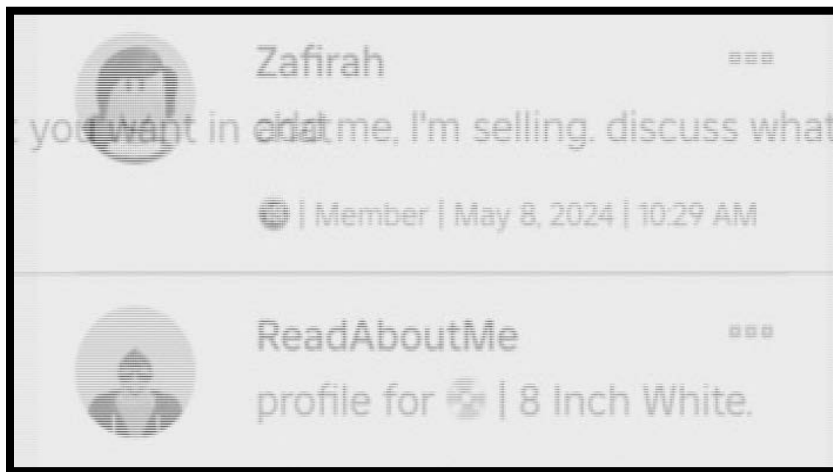
<sup>74</sup> Jonathan Burnay, Brad J. Bushman & Frank Larøi, *Effects of Sexualized Video Games on Online Sexual Harassment*, 45 *Aggressive Behavior* 2, 214 (March/April 2019).

<sup>75</sup> Jay G. Hull et al., *A Longitudinal Study of Risk-Glorifying Video Games and Behavior Deviance*, *J. Pers. Soc. Psychol.* 107(2), 300 (Aug. 2014), <https://psycnet.apa.org/doi/10.1037/a0036058>.

reinforcing children’s perception that such actions are normal and desirable and making children more likely to replicate these actions in the real world.

90. Playing games *premised* on sexual exploitation, like all the “Diddy” and “Epstein” games available on Roblox, further normalizes exploitative and predatory behavior, blurring the lines of what is acceptable in real life. When such behavior is depicted as humorous, exciting, or rewarded in a game, young players can internalize the idea that sexual harassment or exploitation is harmless or even acceptable. And they become more susceptible to grooming.

91. Moreover, the dangerous content on Roblox is not limited to games. The *Pedophile Hellscape* Report found that a basic search for “adult” in the Roblox app revealed a group with 3,334 members “openly trading child pornography and soliciting sexual acts from minors.”<sup>76</sup> And tracking these members unearthed additional Roblox groups engaged in the same criminal conduct, including one massive group with 103,000 members.<sup>77</sup> Yet Roblox failed even to implement any age restrictions on these criminal groups, deliberately leaving them accessible to all users.<sup>78</sup>



*Public chat wall for a group named “Adult Studios,” where users openly solicited child pornography.<sup>79</sup>*

<sup>76</sup> *Pedophile Hellscape* Report, *supra* note 1.

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

<sup>78</sup> *Id.*

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

**D. Roblox is a hunting ground for predators.**

92. As a platform made for children but that actively invites adults, that does virtually nothing to vet or exclude users and is replete with content celebrating notorious sex criminals—it is no surprise that Roblox has a pedophile problem.

93. Child abuse on Roblox follows a well-known pattern: a predator misrepresents his age, cosplaying as a fellow child on the app; he methodically befriends a vulnerable young victim; then he strategically manipulates the child to move the conversation off Roblox to other apps, like Discord, Snapchat, and text messaging, for more direct communication and image sharing.

94. Roblox thus serves as a predator’s initial access point to children. Media reports have repeatedly highlighted that Roblox “is being used as a first point of contact for predators.”<sup>80</sup> Roblox itself knows that users, children and adults alike, input fake birthdays when creating Roblox accounts and that birthdays are therefore not a particularly reliable indicator of a user’s true age.

95. Children, being children, often fail to recognize the danger of providing to strangers on Roblox their usernames on other sites. Once on another app, like Discord, predators escalate their exploitation by soliciting explicit material like nude photos or videos of children performing sexually inappropriate acts—all of which constitute child pornography—and even by obtaining children’s physical locations.

96. Roblox not only has long known about this problem, but has facilitated it. The company previously did not allow its users to link to Discord because it could not “risk unfairly exposing underage users to platforms such as Discord.”<sup>81</sup> Yet Roblox now allows links to Discord

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<sup>80</sup> *The Dirty Dozen List '24: Roblox*, National Center on Sexual Exploitation, <https://endsexualexploitation.org/roblox/> (last updated Dec. 4, 2024).

<sup>81</sup> @Roblox, Roblox Developer Forum (Nov. 22, 2017, 4:36 p.m.), <https://devforum.roblox.com/t/reminder-regarding-permissible-links/61736>.

to be posted in game descriptions and in user-created Roblox groups. Indeed, Roblox’s March 2022 Community Standards lists Discord as one of only a handful of external apps that users were allowed to link to: “When using Roblox, you may not link to any external websites or services, except for: YouTube, Facebook, Discord, Twitter, and Twitch.”<sup>82</sup>

97. Roblox’s virtual currency system, Robux, further enables predators to exploit children. Predators commonly offer children Robux for explicit photos or demand Robux to avoid publicly releasing them. Roblox nevertheless continues to profit from these tactics by collecting transaction fees on Robux exchanges.

98. Grooming relationships can begin with something as simple as a predator asking a child to be his boyfriend or girlfriend. But some predators move straight to blackmail, often threatening to post nude photos of others online but to claim that the child victim is the person in the photos unless the child complies with the predator’s criminal demands. Roblox knowingly enables this grooming tactic, too. Roblox assures users that it monitors for such interactions. Yet because of all the security failures discussed above, these incidents continue. And though Roblox knows it, Roblox still does not do what it says it does to protect its youngest users.

99. In sum, by billing itself as “one of the safest online environments for . . . the youngest users,”<sup>83</sup> but exposing them to adults who can freely, and falsely, identify themselves as young users, Roblox creates the ideal grooming environment for child sexual predators. Although the ultimate solicitation of explicit photos or other criminal acts may involve other apps, Roblox, through its app’s design and inadequate safety measures, serves as the critical facilitator that enables predators to identify, target, and gain the trust of young victims.

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<sup>82</sup> Roblox Corp., Roblox Community Standards (May 6, 2022).

<sup>83</sup> Matt Kaufman, *Driving Civility and Safety for All Users*, Roblox (July 22, 2024), <https://corp.roblox.com/newsroom/2024/07/driving-civility-and-safety-for-all-users>.

100. Regardless of how the grooming begins, many predators eventually attempt to make in-person contact with the child, leading to harassment, kidnapping, trafficking, violence, and sexual assault. Widely publicized cases have occurred across the country, including Florida.

101. In 2019, a Florida predator systematically used Roblox to target children ages 10-12, moving them to Discord to coerce them into sending him naked pictures of themselves.<sup>84</sup>

102. In April 2022, a 20-year-old Florida man used Roblox to meet an 11-year-old girl who he groomed, kidnapped, and raped.<sup>85</sup>

103. In May 2025, a 17-year-old Florida teenager was arrested after authorities learned he had been communicating on Roblox with numerous children, some as young as eight years old, and convincing them to send him sexually explicit images of themselves over the course of a year.<sup>86</sup>

104. In September 2025, a 20-year-old man was arrested after molesting a young girl whom he had met on Roblox and arranged to meet in person through the app.<sup>87</sup>

105. And just last month, the Flagler Country Sheriff's Office announced the arrest of a 20-year-old man who was charged with soliciting a child for unlawful sexual conduct and

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<sup>84</sup> Max Chesnes, *Deputies Say Vero Beach Man Used Popular Video Game Platforms to Target Children*, TC Palm (Aug. 20, 2019), <https://www.tcpalm.com/story/news/crime/indian-river-county/2019/08/20/detectives-advise-online-safety-after-vero-beach-man-used-video-game-platforms-target-minors/2059599001/>.

<sup>85</sup> Steve Brenner, *'Predator's Paradise' Distraught Mom Begs Roblox for Change After Daughter, 11, Raped by Man, 20, Who Kidnapped Her When They Met Through Game*, U.S. Sun (Aug. 23, 2025), <https://www.the-sun.com/news/15029310/roblox-predators-sexual-abuse-grooming/>.

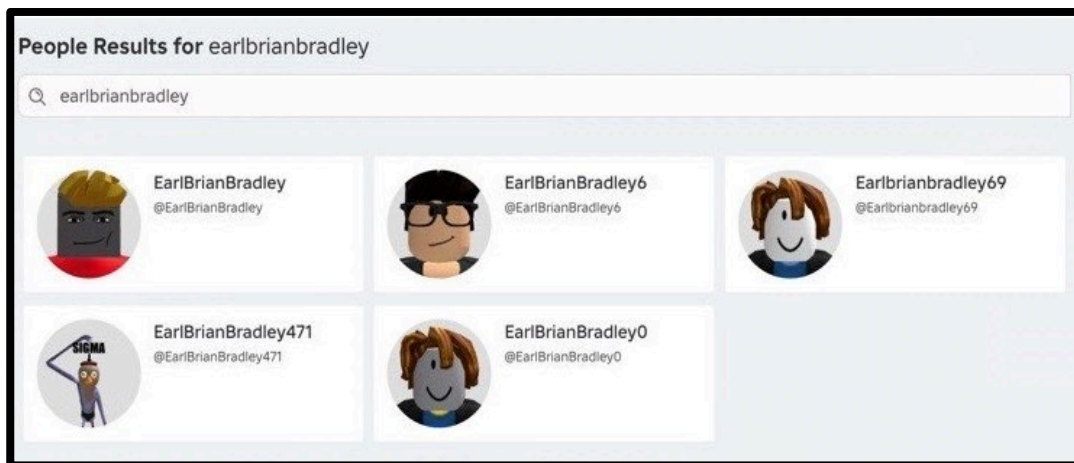
<sup>86</sup> Briana Trujillo, *Ocala 17-Year-Old Convinced Kids to Send Him Sex Abuse Material on Roblox*, NBC (May 2, 2025), <https://www.nbcmiami.com/news/local/ocala-17-year-old-convinced-kids-to-send-him-sex-abuse-material-on-roblox-sheriff/3605691/>.

<sup>87</sup> Andrelika McMillian, *Palm Springs Man Accused of Molesting Minor After Meeting Her on Roblox Online Chat*, WBPF (Sep. 12, 2025), <https://www.wpbpf.com/article/florida-palm-springs-man-accused-of-molesting-minor-on-roblox/66055487>.

transmitting material harmful to minors.<sup>88</sup> The man met the victim on Roblox and “then convinced the child to engage in conversation outside of the gaming platform,” including the exchange of “numerous sexual explicit texts and photographs.”<sup>89</sup>

106. Roblox has knowingly allowed these sexual predators to use its platform to target young users. Indeed, Roblox is well aware that *registered sex offenders*—in other words, known predators—exploit its website to target children.

107. Although many Roblox predators lure children by pretending to be children, these predators do not necessarily hide their intentions. Many Roblox users have usernames like “@Igruum\_minors,” “@RavpeTinyK1dsJE,” and “@EarlBrianBradley,” a reference to a prolific pedophile who raped and molested hundreds of children.



*Results from an account search for “earlbrianbradley.”*<sup>90</sup>

108. Roblox has been publicly condemned for systematically endangering children. The National Center on Sexual Exploitation (“NCSE”) has consistently named Roblox to its “Dirty

<sup>88</sup> *Over Two-Year Investigation Lands California Pervert in Jail, Awaiting Extradition to the Green Roof Inn*, Flagler County Sheriff’s Office (Nov. 7, 2025), <https://www.flaglersheriff.com/cmsfiles/2025-204-Over-Two-Year-Investigation-Lands-California-Pervert-in-Jail.pdf>.

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

<sup>90</sup> *Pedophile Hellscape Report*, *supra* note 1.

Dozen List,” an annual campaign exposing companies that facilitate, enable, or profit from sexual exploitation. According to the NCSE, Roblox “treats child protection like a game.”<sup>91</sup> And “[u]ntil basic child protection standards are met, Roblox remains too high risk for kids.”<sup>92</sup> Rather than consider changes to mitigate the identified risks, however, Roblox’s communications team recommended that Roblox ignore NCSE.

109. Parent reviews of Roblox on sites like *Common Sense Media* also document disturbing incidents of naked avatars, sexting, simulated sexual assault, and adult predators.<sup>93</sup>

110. Even the safety data that Roblox likes to promote only underscores the growing dangers of its app. Roblox claims that it accounts for less than .04% of reports to the National Center for Missing and Exploited Children (“NCMEC”).<sup>94</sup> But this data is entirely self-reported and thus depends on Roblox’s ineffective safety teams. And even this limited, self-reported data reveals a disturbing trend: Roblox’s reports about suspected child sexual exploitation have surged over the years, from 675 reports in 2019 to 13,316 reports in 2023.<sup>95</sup>

111. Roblox also boasts that just “0.0063% of [its] total content was flagged for violating” policies. But again, Roblox itself controls the systems responsible for identifying and flagging such content.<sup>96</sup> This percentage thus reflects not that Roblox keeps its platform safe, but

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<sup>91</sup> National Center on Sexual Exploitation, *supra* note 80.

<sup>92</sup> *Id.*

<sup>93</sup> *Parent Reviews of Roblox*, Common Sense Media, <https://www.common sense media.org/website-reviews/roblox/user-reviews/adult> (last visited Dec. 5, 2025).

<sup>94</sup> Scott Tong & James Perkins Mastromarino, *supra* note 42.

<sup>95</sup> *2019 CyberTipline Reports by Electronic Services Providers (ESP)*, National Center for Missing & Exploited Children, <https://www.missingkids.org/content/dam/missingkids/pdfs/2019-reports-by-esp.pdf>; *see also 2023 CyberTipline Reports by Electronic Services Providers (ESP)*, National Center for Missing & Exploited Children, <https://www.missingkids.org/content/dam/missingkids/pdfs/2023-reports-by-esp.pdf>.

<sup>96</sup> Vikki Blake, *Roblox Reported Over 13,000 Incidents to the National Center for Missing and Exploited Children in 2023*, GamesIndustry.biz (July 23, 2024),

that it creates the appearance of safety through inadequate reporting and enforcement. Indeed, the trust-and-safety “data” Roblox uses to train its artificial intelligence and machine-learning systems only exists because countless instances of abuse, exploitation, and predatory interactions have already occurred on the platform.

112. The harm from this child abuse and exploitation extends beyond the initial victims. Through its app’s design and inadequate safeguards, Roblox has created an abusive ecosystem where former victims—children who were once exploited on Roblox—become teenage perpetrators who then prey upon younger users, making today’s victims tomorrow’s perpetrators. Researchers have repeatedly confirmed this victim-victimizer pipeline: when children are exposed to and victimized by sexual content, they are more likely to become desensitized teenagers and adults who then exploit younger users in the same ways.<sup>97</sup> In effect, Roblox contributes to this “raising of” predators who perpetuate the cycle of exploitation.

**E. Roblox’s recent safety changes fail to address—and indeed only illustrate—Roblox’s years of safety problems.**

113. Years of reported child abuse did not prompt Roblox change its child-safety features. These changes have started to come only after public outrage sparked by more recent and comprehensive reports—such as the *Pedophile Hellscape* Report, published in October 2024 by an investment-research firm focused on short-selling—detailing many of the issues described above that Roblox had long ignored.

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<https://www.gamesindustry.biz/roblox-reported-over-13000-incidents-to-the-national-center-for-missing-and-exploited-children-in-2023>.

<sup>97</sup> James RP Ogloff, Margaret C. Cutajar, Emily Mann & Paul Mullen, *Child Sexual Abuse and Subsequent Offending and Victimization: A 45 Year Follow-Up Study*, Trends & Issues in Crime & Criminal Justice No. 440 (June 2012), <https://www.aic.gov.au/sites/default/files/2020-05/tandi440.pdf>; M. Glasser et al., *Cycle of Child Sex Abuse: Links Between Being a Victim and Becoming a Perpetrator*, British J. Psychiatry (2001).

114. The month after the *Pedophile Hellscape* Report, with its stock now under threat, Roblox finally announced a series of changes to its child safety policies. Roblox would allow users under 13 years old to message other users only within games;<sup>98</sup> it would give parents a separate dashboard to monitor their child’s Roblox accounts, view their child’s Roblox friend list, set spending limits, and manage screen time;<sup>99</sup> it would prevent games from using chalkboard writings, which people used to avoid censoring;<sup>100</sup> and it would restrict users under 13 years old from accessing new Roblox games that were awaiting maturity ratings.<sup>101</sup>

115. These changes were all superficial—too little and too late. None of them involved any new or groundbreaking technology. Every one of them could have been implemented years before. And they were woefully inadequate.

116. Most fundamentally, Roblox still allowed adults to contact children. It banned user-to-user messaging for users under age 13 only *outside of games*. But predators enter and play games that they know children will frequent. And even after these changes, predators could still message children on public chats within games. Roblox thus left this known channel wide open.

117. Roblox also failed to address other core issues whatsoever, such as the app’s lack of any age-verification measures or requirement for parental consent at signup. The changes that Roblox did choose to make—the parental controls, the restrictions on users under age 13—are meaningless if children can still bypass them simply by lying about their birthdays.

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<sup>98</sup> *Roblox Tightens Messaging Rules for Under-13 Users Amid Abuse Concerns*, Reuters (Nov. 18, 2024), <https://www.reuters.com/technology/roblox-tightens-messaging-rules-under-13-users-amid-abuse-concerns-2024-11-18/>.

<sup>99</sup> Robert Booth, *Roblox to Give Parents More Control Over Children’s Activity After Warnings Over Grooming*, The Guardian (Nov. 18, 2024), <https://www.theguardian.com/technology/2024/nov/18/roblox-to-hand-parents-more-control-over-their-childrens-activity>.

<sup>100</sup> *Id.*

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

118. Indeed, just as Roblox rolled out these changes, it simultaneously introduced a new “Parties” feature to counteract any potential loss in user engagement.<sup>102</sup> Knowing that users often turned to other apps like Discord to communicate while playing Roblox games, Roblox added the “Parties” feature to enable users to coordinate on Roblox and thereby to capture that traffic and revenue. Although the full feature (with chat) is available only to users aged 13 and older, such limitations are hollow without robust age verification. And children below 13 can still play a game as a “Party” and use the chat feature within the game.<sup>103</sup>

119. Roblox likewise did not commit to increasing its trust-and-safety budget, hiring more moderators, or implementing any sort of identity check to prevent registered sex offenders from making accounts.

120. In April 2025, Roblox again deceptively touted new safety features that, in reality, were glaringly deficient. This update included three new features for parents, allowing them to block children from playing specific games, allowing them to block people on their child’s friend Roblox list, and providing visibility into the games that their child spends the most time in.<sup>104</sup>

121. Once again, none of these controls required previously unavailable technology. All could have been implemented years earlier. And none addressed the core problems with Roblox that facilitate grooming and predation by enabling adults to easily find and communicate with children. A list of the top twenty games that a child plays does not tell a parent where the child might be interacting with adults who pretend to be children. Without allowing parents to see

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<sup>102</sup> Rebecca Ruiz, *Roblox’s New Party Feature Makes Discord Obsolete*, Mashable (Dec. 2, 2024), <https://mashable.com/article/roblox-party-discord>.

<sup>103</sup> *Party FAQ*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/32461054421012-Party-FAQ> (last visited Dec. 5, 2025).

<sup>104</sup> Matt Kaufman, *New Tools for Parents to Personalize Their Child’s Experience on Roblox*, Roblox (Apr. 2, 2025), <https://corp.roblox.com/newsroom/2025/04/new-parental-controls-on-roblox>.

whom their child is messaging and what the messages say, parents cannot determine which users must be blocked from their child’s friend list. And blocking specific games is ineffective when, as discussed above, inappropriate games are re-posted as soon as they are taken down.

122. In April 2025, a U.K. research firm demonstrated just how easy it was for predators to find children on Roblox, and then move the conversation to another app, despite Roblox’s ban on direct messaging outside of games with users under age 13 and its other newly announced changes.<sup>105</sup> Within games, Roblox’s default setting was still to allow “everyone” to chat with users under 13, enabling predators to find and contact children, groom them, and obtain their usernames on other platforms.<sup>106</sup> The report accordingly found that “[a]dults and children can chat with no obvious supervision” and that “[t]he safety controls that exist are limited in their effectiveness and there are still significant risks for children on the platform.”<sup>107</sup>

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<sup>105</sup> *A Digital Playground: The Real Guide to Roblox*, Revealing Reality (Apr. 13, 2025), <https://think.revealingreality.co.uk/roblox-real-guide>.

<sup>106</sup> *Parental Controls Overview*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/3042831012-1620-Parental-Controls-Overview> (last visited Dec. 5, 2025).

<sup>107</sup> Revealing Reality, *supra* note 105.



*In April 2025, a research agency demonstrated how easy it was for a 42-year-old account to find a five-year-old user on Roblox and get the child to move the conversation to Snapchat.<sup>108</sup>*

123. All the while, Roblox employees have known that chat created a massive risk of grooming and yet that Roblox could not detect grooming well. Indeed, each day Roblox receives significantly more child endangerment reports than it has the capacity to review. As a result, adult predators consistently go unidentified and are able to keep targeting children.

124. And just last month, a researcher was able to create an account as an eight-year-old, which gave her access to “bathroom simulator games, dungeons, casinos, horror games, escape rooms and countless role-playing games where I can send and receive messages from strangers.”<sup>109</sup> She found that “[t]he number of inappropriate games I can access while logged on

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<sup>108</sup> *Id.*

<sup>109</sup> Sarah Martin, *My Chilling Week on Roblox: Sexually Assaulted and Shat on as a Child Avatar Roaming the Online World*, *The Guardian* (Nov. 5, 2025), <https://www.theguardian.com/games/2025/nov/05/roblox-game-robux-children-child-kids-safety-parental-controls>.

as a child appears endless.”<sup>110</sup> And when she logged in as a pretend thirteen-year-old girl, a male player sexually assaulted her avatar.<sup>111</sup> This all occurred “with all parental controls in place.”<sup>112</sup>



*November 2025 report: “A player sits on my face and thrusts his hips while I implore him to leave me alone.”<sup>113</sup>*

125. In the summer of this year, facing mounting legal pressure, Roblox implemented some additional policy changes for gameplay and communication. In July, Roblox announced an optional feature called “Trusted Connections” for teenage users, which allows unfiltered voice and text chats.<sup>114</sup> Roblox claims that only users whose are verified via video selfie technology as age 13+ are eligible to be a Trusted Connection, and they may only add 18+ users as Trusted Connections through a phone number or in-person QR code.<sup>115</sup> If the AI technology employed by

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<sup>110</sup> *Id.*

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

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

<sup>113</sup> *Id.*

<sup>114</sup> Megan Farokhmanesh, *Roblox’s New Age Verification Feature Uses AI to Scan Teens’ Video Selfies*, Wired (July 17, 2025) <https://www.wired.com/story/robloxs-new-age-verification-feature-uses-ai-to-scan-teens-video-selfies/>.

<sup>115</sup> *Id.*

Roblox determines a user is under the age of 13, that user will purportedly lose access to certain features that Roblox considers not to be age appropriate.<sup>116</sup>

126. Also in July 2025, Roblox allowed users to disable a setting that shows others that they are on Roblox and to set a “do not disturb” status to prevent push notifications during specific time windows.<sup>117</sup>

127. In August 2025, Roblox restricted all users’ ability to access experiences that are “unrated”—*i.e.*, games that were not assigned a maturity label.<sup>118</sup> Before this update, any user could make an account, select an age above 13, and access these experiences. Despite this change, maturity labels are still assigned based on a questionnaire filled out of the game creator and without any Roblox verification of the game’s content.<sup>119</sup>

128. In line with new online safety codes instituted by the Australian government, Roblox has also agreed to institute various new features there by the end of this year.<sup>120</sup> Specifically, Roblox accounts for Australians users under 16 years old will be, by default, set to private and prohibited from direct chat and “experience chat.”<sup>121</sup> Those users will only be allowed to access chat features if their accounts undergo an “age estimation technology,” and even then

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<sup>116</sup> *Id.*

<sup>117</sup> Anna Halkidis, *Roblox Introduces 4 New Safety Features to Better Protect Teens*, Parents (July 17, 2025), <https://www.parents.com/roblox-safety-features-for-teens-11773713>.

<sup>118</sup> Tom Bowen, *How to Access Unrated Experiences in Roblox*, Gamerant (May 18, 2025), <https://gamerant.com/roblox-unrated-experience-join-fix/>.

<sup>119</sup> Dominik Bošnjak, *Roblox Shuts Down Gray-Area Games Over Child Safety Concerns*, Gamerant (Sep. 30, 2025), <https://gamerant.com/roblox-unrated-experiences-games-disabled-child-safety-efforts/>.

<sup>120</sup> *Roblox Commits to Lift Game to Protect Kids from Online Grooming Under Australia's World-leading Online Safety Codes and Standards*, Australian eSafety Commissioner (Sep. 15, 2025), <https://www.esafety.gov.au/newsroom/media-releases/roblox-commits-to-lift-game-to-protect-kids-from-online-grooming-under-australias-world-leading-online-safety-codes-and-standards>.

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

will be prohibited from chatting with adults.<sup>122</sup> Additionally, Roblox will allow Australian parents to disable chat even if their children have undergone age estimation.<sup>123</sup>

129. Roblox’s continued failure to implement practical child safety measures for users in Florida and the United States is thus not due to inability. To be sure, even Roblox’s new measures leave much to be desired, but the ease of implementing them for young users in Australia (and their parents) underscores how Roblox has willfully left young users in Florida exposed to predators.

130. Recently, Roblox’s age-estimation feature has begun to roll out in the United States on a voluntary basis.<sup>124</sup> Roblox claims that its age-estimation technology can effectively determine the age of a user.<sup>125</sup> Immediate tests to the feature, however, suggest that this is far from the truth. Just a week after Roblox’s announcement, a 14-year-old user posted on X—formerly Twitter—that he was able to bypass the age-verification technology by drawing a beard with sharpie on his face, wearing glasses, and applying some lotion.<sup>126</sup> Another 16-year-old user was given an estimated age of 33.<sup>127</sup> And the list goes on.<sup>128</sup> With age-estimation so easy to bypass, children will remain at risk.

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

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

<sup>124</sup> *Roblox Expands Facial Age Checks for Communication, Setting New Safety Standard* Roblox (Nov. 18, 2025), <https://ir.roblox.com/news/news-details/2025/Roblox-Expands-Facial-Age-Checks-for-Communication-Setting-New-Safety-Standard/default.aspx>.

<sup>125</sup> *About Facial Age Estimation*, Roblox, <https://corp.roblox.com/age-estimation> (last visited Dec. 5, 2025).

<sup>126</sup> @Drake5108679943, X (Nov. 21, 2025, 5:12 a.m.), <https://x.com/DuckyMely/status/1991812046573465777>.

<sup>127</sup> @losertism\_, X (Nov. 18, 2025, 7:23 p.m.), [https://x.com/losertism\\_/status/1990938936294990009?s=20](https://x.com/losertism_/status/1990938936294990009?s=20); @losertism\_, X (Nov. 18, 2025, 7:26 p.m.), <https://x.com/losertism/status/1990939603017277867?s=20>.

<sup>128</sup> @flammalouve, X (Dec. 5, 2025, 10:24 a.m.), <https://x.com/Flammalouve/status/1996963794426175790>; @kiwiih0, X (Dec. 4, 2025, 4:31 a.m.), <https://x.com/kiwiih0/status/1996512579330674754>; @ColRealPro, X (Nov. 18, 2025, 2:05 p.m.), <https://x.com/ColRealPro/status/1990858917589434459>.

### III. Roblox Represents Its Predatory Platform as a Safe Playground.

131. Over the years, Roblox has repeatedly represented that its app is safe for children. Indeed, this lie is central to Roblox’s business model. Roblox accordingly does not warn users or parents about the dangers that the platform poses to minors. To the contrary, Roblox continues to entice potential new victims with false safety promises.

132. As early as 2007, Roblox assured parents through Roblox’s website and other company statements that the Roblox platform is an “online virtual playground . . . where kids of all ages can safely interact, create, have fun, and learn.”<sup>129</sup>

133. From 2008 to 2016, Roblox continued to promise parents that “[w]e take every precaution possible to make sure kids are protected from inappropriate and offensive individuals as well as from indecent and distasteful content.”<sup>130</sup> Roblox also assured parents that Roblox had a zero-tolerance policy for “swearing and obscenities, messages and content of a sexual or violent nature, and any sort of aggressive or threatening communication,” and that Roblox “immediately suspended or permanently expelled” any offenders,<sup>131</sup> which was false.

134. In 2017, Roblox began declaring in its “Parents’ Guide” that it “take[s] kids’ safety and privacy very seriously” and “strive[s] to continually develop new and innovative technologies that will protect the safety of our community while allowing players to imagine, create, and play together in a family-friendly environment.”<sup>132</sup> Roblox similarly advertised its platform as “a safe,

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<sup>129</sup> *Frequently Asked Questions (FAQs)*, Roblox, <https://web.archive.org/web/20071105104643/http://www.roblox.com/Parents/FAQs.aspx> (archived Nov. 5, 2007).

<sup>130</sup> *Keeping Kids Safe*, Roblox, <https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx> (archived May 1, 2008); *see also Information for Parents*, Roblox, <https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents> (archived Jan. 31, 2016).

<sup>131</sup> *Id.*

<sup>132</sup> *Parents’ Guide*, Roblox, <https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/> (archived July 16, 2017).

moderated place to meet, play, chat, and collaborate on creative projects.”<sup>133</sup>

135. Roblox’s representations have remained largely unchanged since then, even as the reports of child abuse pile up.

136. In 2023, for example, Roblox assured parents that it is “committed to ensuring that Roblox is a safe and fun place for everyone.”<sup>134</sup> To that end, Roblox claimed that it “continually develop[s] cutting-edge technologies to ensure that the Roblox platform remains a safe and fun space for players all over the world.”<sup>135</sup> Indeed, according to Roblox, it “goes above and beyond to foster an environment where people of any age can create, play, learn, and imagine safely. We’ve kept children’s privacy and safety top-of-mind when designing our platform, especially through the implementation of advanced text filters that block inappropriate language or other unsafe content.”<sup>136</sup> As seen above, those filters are plainly ineffective. And it would take more than another year for Roblox—in response to reports like the *Pedophile Hellscape* Report—finally to begin instituting changes that at least purport to address some of the platform’s fundamental safety problems (albeit still ineffectively).

137. Today, Roblox’s website claims: “Safety and civility are foundational to this vision and creating a platform where everyone feels welcome. That’s why we’ve always made it a key priority to ensure our community members can connect, create, and come together in a space that is welcoming, safe, inclusive and respectful. We’ve spent over a decade building a stringent safety

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

<sup>134</sup> *Roblox FAQ*, Roblox, <https://web.archive.org/web/20230328011957/https://corporate.roblox.com/faq/> (archived Mar. 28, 2023).

<sup>135</sup> *For Parents*, Roblox, <https://web.archive.org/web/20230405060048/https://corporate.roblox.com/parents/> (archived Apr. 5, 2023).

<sup>136</sup> *Roblox & User Data FAQ*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/4406238486676-Roblox-User-Data-FAQ> (last visited Dec. 5, 2025).

system and policies that we are proud of[.]”<sup>137</sup>

138. Roblox also continues to falsely promise that it “won’t allow language that is used to harass, discriminate, incite violence, threaten others, or used in a sexual context.”<sup>138</sup> And it continues to tout a “stringent safety system and policies,”<sup>139</sup> which purportedly includes an “expertly trained team with thousands of members dedicated to protecting our users and monitoring for inappropriate content”; as well as “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 chat filters for inappropriate content, which “are even stricter” for children under 13 and “include any potentially identifiable personal information, slang etc.”<sup>140</sup>

139. Roblox’s highest executives further misrepresent the platform’s safety for young users, including those in Florida, and including in direct response to concerns raised by parents.

140. For example, in 2009, a blogger wrote about blocking Roblox because he doubted its safety for his children. CEO David Baszucki responded, reassuring the blogger that Roblox flags and removed “obviously offensive content” and, if “something is marginal, but gets flagged as inappropriate,” Roblox “investigate[s] immediately.”<sup>141</sup>

141. In a 2013 *Wired* interview, when asked whether a parent should be concerned about whom his child chats with in-game, Baszucki responded by taking a sentence verbatim from Roblox’s webpage for parents: “We take every precaution possible to make sure kids are protected

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<sup>137</sup> *Safety & Civility at Roblox*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox> (last visited Dec. 5, 2025).

<sup>138</sup> *Safety Features: Chat, Privacy & Filtering*, Roblox, <https://en.help.roblox.com/hc/en-us/articles/203313120-Safety-Features-Chat-Privacy-Filtering> (last visited Dec. 5, 2025).

<sup>139</sup> Roblox, *supra* note 137.

<sup>140</sup> *Id.*

<sup>141</sup> Eric Frenchman, *Revisiting Roblox*, Pardon My French (Oct. 5, 2009), <https://pardonmyfrench.typepad.com/pardonmyfrench/2009/10/revisiting-roblox.html>.

from inappropriate and offensive individuals as well as from indecent and distasteful content.”<sup>142</sup>

142. Roblox’s current Vice President of Civility & Partnerships, Tami Bhaumik, has doubled down on these promises in statements over the years to parenting magazines, news outlets, podcasts, and other sources—all aimed at persuading parents to let their children use Roblox.

143. In 2018, Bhaumik told the *Washington Post* that Roblox “focus[es] on making sure that everything is done in a safe and appropriate way.”<sup>143</sup> That same year, she claimed to another newspaper that Roblox’s “safety team reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate.”<sup>144</sup> She also boasted that Roblox has “created extensive parental controls for our games and a detailed Roblox Parent’s Guide that provides information to parents to help create a Roblox experience that’s best for their child.”<sup>145</sup>

144. In 2019, while presenting on a “Digital Civility Panel,” Bhaumik emphasized that “[w]e make sure there’s a safe environment,” citing Roblox’s “tremendous reporting system” and “incredible moderation and CS team that reacts very, very quickly.”<sup>146</sup> At the same time—reflecting Roblox’s years of disregarding trust and safety, but contradicting Roblox’s claim that it has always taken “every precaution possible” to protect children—Bhaumik conceded that “digital civility did not exist at Roblox a year and a half ago and we established this and made it a

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<sup>142</sup> Tony Sims, *Interview with David Baszucki, Founder & CEO of Roblox*, Wired (Feb. 7, 2013), <https://www.wired.com/2013/02/roblox/>.

<sup>143</sup> 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/>.

<sup>144</sup> Chris Pollard, *Police Warn That Children as Young as Five-Years-Old Are Seeing Naked Lego-Type Characters Having Sex on Roblox App*, The Sun (Jan. 29, 2018), <https://www.thesun.co.uk/news/5445444/roblox-app-children-danger-sex-warning/>.

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

<sup>146</sup> Thoughtworks, *Digital Civility Panel - Anne Collier, Maura Tuohy Di Muro, Tami Bhaumik, Matt Soeth*, YouTube (Oct. 23, 2019), [https://www.youtube.com/watch?v=XoUs1Js7WG0&list=PLcKphP00N1\\_kCLjvcOWdwbegJkNSL-CuL&index=6](https://www.youtube.com/watch?v=XoUs1Js7WG0&list=PLcKphP00N1_kCLjvcOWdwbegJkNSL-CuL&index=6).

movement within our company.”<sup>147</sup> She added: “It’s still very early days for us. This whole digital civility focus for Roblox is still there, we’re just still establishing it.”<sup>148</sup>

145. In a 2022 video, Bhaumik asserted that Roblox’s “number one priority” is “to create a safe, civil, and inclusive community” and that “[s]afety and civility has always been baked into everything that we do.”<sup>149</sup> Later on a podcast, she claimed that Roblox has “thousands of human moderators on the front lines” and “machine learning that is constantly taking a look at chat filters.”<sup>150</sup> With such measures, she declared, “[a]ny sort of bad actor that comes onto the platform is dealt with swiftly” and “[w]e remove any content that’s reported to us within minutes.”<sup>151</sup>

146. And 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.”<sup>152</sup>

147. Similar assurances have come from Matt Kaufman, formerly Roblox’s Chief Systems Officer for Roblox. In 2023, he was appointed Roblox’s Chief Safety Officer, at which point he too began peddling Roblox’s child safety narrative.

148. For example, in a 2024 blog post on Roblox’s website, Kaufman asserted that “Roblox has spent almost two decades working to make the platform one of the safest online environments for our users, particularly the youngest users. Our guiding vision is to create the

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<sup>147</sup> *Id.*

<sup>148</sup> *Id.*

<sup>149</sup> Video Interview with Tami Bhaumik, Roblox’s VP of Digital Civility & Partnerships, Facebook (2022), <https://www.facebook.com/bedford.sheriff/videos/roblox-how-to-help-kids-use-itsafelyroblox-vp-of-digital-civility-partnerships/1338989609901259/>.

<sup>150</sup> Into the Metaverse, *EP.21: Tami Bhaumik (Roblox) - Building a Safe & Resilient Metaverse*, YouTube (Sep. 13, 2022), [https://www.youtube.com/watch?v=LT5\\_bBOYS9A](https://www.youtube.com/watch?v=LT5_bBOYS9A).

<sup>151</sup> *Id.*

<sup>152</sup> 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/>.

safest and most civil community in the world.”<sup>153</sup> According to Kaufman, “[f]or 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.”<sup>154</sup> A few months later, he added: “Safety is and always has been foundational to everything we do at Roblox.”<sup>155</sup>

149. In another blog post, Kaufman extolled Roblox’s supposed “track record of putting the safety of the youngest and most vulnerable people on our platform first.”<sup>156</sup>

150. Facing pointed questions about child abuse on Roblox, Kaufman has told NPR that “any time anything happens to a child that puts them at risk is one too many” and that “[w]e will do everything we possibly can to stop that,”<sup>157</sup> even though Roblox has elsewhere admitted to investors that it is “unable to prevent all such [inappropriate] interactions from taking place.”<sup>158</sup> Attempting to downplay Roblox’s serious safety failures, Kaufman also told NPR that “I think we’re losing sight of the tens of millions of people where Roblox is an incredibly enriching part of their life.”<sup>159</sup> And in an interview after the Attorney General began his investigation, Kaufman told a Fox 35 Orlando reporter that “Roblox is unique. Unique in the fact that we don’t encrypt any messaging, we monitor all messaging, we have some of the most stringent policies in the world, and we’re very aggressive in reporting issues to law enforcement. And Roblox, it just is not a place where bad actors will want to be.”<sup>160</sup>

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<sup>153</sup> Matt Kaufman, *supra* note 83.

<sup>154</sup> *Id.*

<sup>155</sup> Matt Kaufman, *Major Updates to Our Safety Systems and Parental Controls*, Roblox (Nov. 18, 2024), <https://corp.roblox.com/newsroom/2024/11/major-updates-to-our-safety-systems-and-parental-controls>.

<sup>156</sup> Matt Kaufman, *Scaling Safety and Civility on Roblox*, Roblox (Apr. 4, 2024), <https://corp.roblox.com/newsroom/2024/04/scaling-safety-civility-roblox>.

<sup>157</sup> Scott Tong & James Perkins Mastromarino, *supra* note 60.

<sup>158</sup> Roblox Corp., S-1 (Securities Registration Statement), at 24 (Nov. 19, 2020).

<sup>159</sup> Scott Tong & James Perkins Mastromarino, *supra* note 60.

<sup>160</sup> *Roblox Responds to Child Safety Concerns*, Fox 35 Orlando (May 2, 2025), <https://www.fox35orlando.com/video/1634881>.

151. All these statements are carefully crafted to deceive users and parents into believing that Roblox is safe and appropriate for children. Indeed, Roblox’s public representations create the impression that a “large team of human moderators” performs a “safety review of every uploaded image, audio, and video file” before Roblox makes content available to potentially vulnerable users—when, in reality, it does not.<sup>161</sup> And when parents, the press, and others have raised questions or concerns, Roblox’s highest executives have consistently responded by repeating the platform’s false promises about safety.

152. Meanwhile, Roblox has engaged in a deceptive public relations campaign, using ostensibly independent online-safety organizations to influence the narrative about its platform’s safety and lack thereof.

153. Roblox’s own Vice President of Civility and Partnerships, Tami Bhaumik, serves as board chair of the Family Online Safety Institute (“FOSI”), an organization that Roblox has backchanneled with for years. For example, when a major news organization approached FOSI about Roblox’s “condo” games, Roblox helped prepare FOSI’s response, including with a list of talking points. At the same time, Roblox’s media consultants counseled it against contacting the news organization itself to avoid revealing that FOSI was coordinating with Roblox and thereby reducing the credibility of FOSI’s response.

154. When Roblox instituted some of these changes in November 2024, industry-funded safety “experts” were notably quick to praise them. In the press release announcing these changes, Roblox quotes Larry Magid, CEO of ConnectSafely, as saying: “Roblox has consistently provided parents with tools that enable their children to enjoy the platform, while helping protect them against online risks. These new friend- and experience-blocking tools provide parents with

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<sup>161</sup> Roblox, *supra* note 137.

even more ways to help ensure their children are using it safely. Safety, fun, and adventure are not mutually exclusive.”<sup>162</sup> What the press release did not reveal is that ConnectSafely—a non-profit ostensibly focused on educating people about internet safety—is funded by tech companies and lists Roblox (along with, *e.g.*, Discord and Snap) as one of its “supporters.”<sup>163</sup>

155. That same day, an online parenting magazine favorably quoted Stephen Balkam, CEO of FOSI, as endorsing Roblox’s new features as a win for child safety.<sup>164</sup> That article similarly omitted that Tami Bhaumik, a Roblox VP, serves as FOSI’s board chair.<sup>165</sup>

156. A few weeks later, ConnectSafely CEO Magid was quoted again in praise of Roblox, this time in a *Newsweek* article championing Roblox as a “trusted playground” for kids: “I would put them very high up on the list of companies that seem to care. They actually have a vice president of civility. It’s unheard of to have somebody at that level of the company that focuses on civility. They really work very hard to make it a friendly, comfortable, civil environment for young people.”<sup>166</sup> This article made no mention of his organization’s financial ties to Roblox, either.

157. FOSI CEO Stephen Balkam was also quoted in the *Newsweek* piece, claiming that Roblox was “top-of-class” for its safety features and even repeating Roblox’s own party line that safety is “part of [Roblox’s] DNA.”<sup>167</sup> This article again omitted FOSI’s ties to Roblox.

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<sup>162</sup> Matt Kaufman, *supra* note 104.

<sup>163</sup> *Supporters*, ConnectSafely, <https://connectsafely.org/about-us/supporters/> (last visited Dec. 5, 2025).

<sup>164</sup> Anna Halkidis, *What Roblox’s Latest Changes Mean for Your Kids’ Online Safety*, Parents (Nov. 18, 2024), <https://www.parents.com/roblox-new-parental-controls-8747405>.

<sup>165</sup> *FOSI Welcomes Roblox Vice President as New Board Chair*, FOSI (Oct. 12, 2022), <https://www.fosi.org/about-press/fosi-welcomes-roblox-vice-president-as-new-board-chair>.

<sup>166</sup> Katherine Fung, *How Roblox Became a Trusted Playground for Millions of Kids*, *Newsweek* (Apr. 23, 2025), <https://www.newsweek.com/how-roblox-became-trusted-playground-millions-kids-2057601>.

<sup>167</sup> *Id.*

158. Even when discussing new safety changes, Roblox executives have continued to downplay the platform’s pedophile problem.

159. In one recent interview, Roblox’s Senior Director of Product Policy, Eliza Jacobs, claimed that Roblox uses a “safe by default strategy” for parental controls.<sup>168</sup> Although she did not identify any such default controls, she did assert that “the most important thing” is to make sure that children “are signing up with the right age.”<sup>169</sup> And when asked about Roblox’s responsibility for harm to children on the platform, Jacobs stated—echoing Roblox’s Chief Safety Officer, Matt Kaufman—that “[e]ven one of these cases is too many.”<sup>170</sup> Those are certainly correct sentiments. Yet they conveniently ignore that Roblox still doesn’t verify user ages when creating an account or otherwise exert the efforts it claimed to exert to prevent cases of abuse.<sup>171</sup>

160. In a viral interview on a *New York Times* podcast, Roblox CEO David Baszucki made clear that he too would prefer to ignore Roblox’s pedophile problem. He went so far as to say that “the problem of predators on Roblox” is not really a problem, “but an opportunity[.]”<sup>172</sup> Yet when probed about that “opportunity”—for example, about removing the remaining chat features that allow predators to contact children—he deflected, claiming Roblox helps children struggling with loneliness.<sup>173</sup> Although he acknowledged that Roblox still allows users to easily misrepresent their age, he again ignored a follow-up question about anonymous adults’ ability to chat with minors on the platform, instead discussing Roblox’s (easily circumvented) text filtering

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<sup>168</sup> *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/>.

<sup>169</sup> *Id.*

<sup>170</sup> *Id.*

<sup>171</sup> *Id.*

<sup>172</sup> *We Asked Roblox’s C.E.O. About Child Safety. It Got Tense.*, N.Y. Times (Nov. 21, 2025), <https://www.nytimes.com/2025/11/21/podcasts/hardfork-roblox-child-safety.html>.

<sup>173</sup> *Id.*

system.<sup>174</sup> When pressed about age verification and related safety issues, he became terse, saying “I thought we were going to be talking about fun, funny things in the industry and all that” and admonishing the hosts’ “superfocus” on child safety.<sup>175</sup>

161. Roblox has also resorted to retaliation. It has recently come to light that Roblox actively punished a user who attempted to identify and remove predators from the platform—including predators in Florida.

162. Michael Schlep was a Roblox user and developer. As a pre-teen and teen, Schlep himself was targeted by another prominent Roblox developer, who “sent Schlep graphic violent content, pornography, and engaged in inappropriate sexual conversations.”<sup>176</sup> As a result, Schlep attempted suicide and was hospitalized.<sup>177</sup> Schlep’s mother contacted Roblox about the abuse and its consequences. The company did nothing, continuing to platform and contract with this predator for years.<sup>178</sup> Only after *another* user reported sexual abuse did Roblox finally ban the predator.<sup>179</sup>

163. Schlep assembled a team of users to identify other predators active on Roblox. These efforts resulted in six arrests across the United States, including in Florida.<sup>180</sup> The Florida arrest resulted in a conviction on three counts of possession of child sexual abuse material.<sup>181</sup>

164. Schlep’s goal—to remove predators from Roblox and protect young users—aligned with Roblox’s purported efforts “to make the platform one of the safest online environments for

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<sup>174</sup> *Id.*

<sup>175</sup> *Id.*

<sup>176</sup> *Roblox Retaliates Against Child Abuse Survivor Who Exposed Platform's Predator Problem*, EZ Newswire (Aug. 14, 2025), <https://www.eznewswire.com/newsroom/roblox-retaliates-child-abuse-survivor-predator-problem-sggh-milberg>.

<sup>177</sup> *Id.*

<sup>178</sup> *Id.*

<sup>179</sup> *Id.*

<sup>180</sup> Miles Klee, *Roblox Banned a Creator for ‘Hunting’ Pedophiles – And Critics Are Pissed*, Rolling Stone (Aug. 25, 2025), <https://www.rollingstone.com/culture/culture-features/roblox-schlep-pedophile-vigilante-lawsuits-1235414218/> (last visited Dec 5, 2025).

<sup>181</sup> *State v. Hunt*, No. 53-2024-cf-008281-A000, Guilty Plea (Polk Cnty. Aug. 29, 2025).

our users, particularly the youngest users.”<sup>182</sup> When he brought detailed information about these predators to Roblox, however, the company proved to be a “brick wall.”<sup>183</sup> Schlep therefore began documenting his concerns and efforts to identify predators in a series of YouTube videos.<sup>184</sup>

165. Roblox responded by sending Schlep a cease-and-desist notice and banning his Roblox accounts.<sup>185</sup> The notice describes Schlep’s efforts to remove predators from Roblox as “harmful activit[y].”<sup>186</sup> In a press release, Roblox described those efforts as, somehow, “[s]imilar to actual predators.”<sup>187</sup>

166. These retaliatory actions bely Roblox’s assertion that it is “committed to aggressively combating illegal and harmful conduct.”<sup>188</sup> While permitting predators free range over its platform, Roblox quickly banned a user who sought to identify those predators.

167. Far from creating a safe environment for its child users in Florida and elsewhere, Roblox knowingly designed, built, and maintains a platform that lacks basic safety features necessary to protect children, and enable parents to protect their children, from sexual predators. And far from warning users and parents about these defects, Roblox recruits ever more children with false assurances of safety. The result is an ideal place for predators to find new victims.

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<sup>182</sup> Matt Kaufman, *supra* note 83.

<sup>183</sup> Klee, *supra* note 180.

<sup>184</sup> See e.g., RealSchlep, *We Got A Roblox Predator Arrested*, YouTube (Sep. 27, 2024), <https://www.youtube.com/watch?v=D0R559dMxc8>; RealSchlep, *Roblox Predator Gets Arrested! (ft: JiDion & Ruben Sim)*, YouTube (Nov. 26, 2024), [https://www.youtube.com/watch?v=eLDfGhu7\\_P4](https://www.youtube.com/watch?v=eLDfGhu7_P4).

<sup>185</sup> @RealSchlep, X (Aug. 9, 2025, 2:58 p.m.), <https://x.com/RealSchlep/status/1954255952997478537>.

<sup>186</sup> *Id.*

<sup>187</sup> Matt Kaufman, *More on Our Removal of Vigilantes from Roblox*, Roblox (Aug. 13, 2025), <https://corp.roblox.com/newsroom/2025/08/more-on-removal-of-vigilantes-from-roblox>.

<sup>188</sup> @RealSchlep, *supra* note 185.

**CAUSES OF ACTION**

**COUNT I**

**Violation of the Florida Deceptive and Unfair Trade Practices Act  
§ 501.204, Fla. Stat.  
(Unfair and Immoral Acts or Practices)**

168. Plaintiff realleges and incorporates by reference the factual allegations set forth in paragraphs 1–167 above as though fully alleged herein.

169. FDUTPA prohibits “[u]nfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce.” § 501.204(1), Fla. Stat. Its provisions are “construed liberally” to “protect the consuming public and legitimate business enterprises from those who engage in unfair methods of competition, or unconscionable, deceptive, or unfair acts or practices in the conduct of any trade or commerce.” *Id.* § 501.202(2).

170. Under FDUTPA, an “unfair practice” is any that “offends established public policy and . . . is immoral, unethical, oppressive, unscrupulous or substantially injurious to consumers.” *PNR, Inc. v. Beacon Prop. Mgmt., Inc.*, 842 So. 2d 773, 777 (Fla. 2003) (quotation marks omitted).

171. FDUTPA broadly defines “trade or commerce” as “the advertising, soliciting, providing, offering, or distributing, whether by sale, rental, or otherwise, of any good or service, or any property, whether tangible or intangible, or any other article, commodity, or thing of value, wherever situated.” § 501.203(8), Fla. Stat.

172. Roblox has engaged in trade and commerce in Florida by, among other things, promoting, marketing, and advertising the Roblox platform to consumers in this State; by providing the services of its platform to consumers in this State in exchange for valuable consumer data; and by profiting off of transactions involving its virtual currency (Robux) in this State.

173. In the course of this trade and commerce, Roblox has engaged and continues to engage in the above unfair acts and practices, which include:

- a. Designing, offering, and maintaining a gaming platform without requiring age verification, where children can pretend to be adults and adults can pretend to be children;
- b. Designing, offering, and maintaining a gaming platform that is easily accessible to children without parental consent while actively cutting trust-and-safety costs and recruiting more adults to the platform;
- c. Designing, offering, and maintaining a gaming platform where openly pornographic and pedophilic content is readily available to young children;
- d. Designing, offering, and maintaining a gaming platform where anyone can easily communicate with young children and then execute the known predatory tactic of transitioning those communications to other chat-focused apps;
- e. Establishing, maintaining, and profiting from a virtual currency, Robux, that predators use to procure child sexual abuse material;
- f. Further endangering children by introducing features like Voice Chat and Roblox Connect; and
- g. Recruiting increasingly more child users by falsely representing to them and their parents that the platform is safe.

174. In the course of this trade and commerce, Roblox has engaged and continues to engage in the above acts and practices, which offend public policy and deeply immoral. These acts and practices include:

- a. Designing, offering, and maintaining a gaming platform without requiring age verification, where children can pretend to be adults and adults can pretend to be children;
- b. Designing, offering, and maintaining a gaming platform that is easily accessible to children without parental consent while actively cutting trust-and-safety costs and recruiting more adults to the platform;
- c. Designing, offering, and maintaining a gaming platform where openly pornographic and pedophilic content is readily available to young children;
- d. Designing, offering, and maintaining a gaming platform where anyone can easily communicate with young children and then execute the known predatory tactic of transitioning those communications to other chat-focused apps; and
- e. Establishing, maintaining, and profiting from a virtual currency, Robux, that predators use to procure child sexual abuse material; and

175. Roblox knew or should have known that these acts and practices are unfair under FDUTPA.

176. These violations subject Roblox to civil penalties, as well as equitable and injunctive relief, under FDUTPA. Florida consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of these violations. Absent injunctive relief, Roblox is likely to continue to harm Florida consumers and the public interest.

177. Any person or corporation “who is willfully using, or has willfully used, a method, act, or practice declared unlawful under [§ 501.204, Fla. Stat.] . . . is liable for a civil penalty of not more than \$10,000 for each such violation.” § 501.2075, Fla. Stat. A violation is “willful” if the defendant “knew or should have known that [its] conduct was unfair or deceptive.” *Id.*

**COUNT II**  
**Violation of the Florida Deceptive and Unfair Trade Practices Act**  
**§ 501.204, Fla. Stat.**  
**(Unconscionable Acts or Practices)**

178. Plaintiff realleges and incorporates by reference the factual allegations set forth in paragraphs 1–167 above as though fully alleged herein.

179. FDUTPA prohibits “[u]nfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce.” § 501.204(1), Fla. Stat. Its provisions are “construed liberally” to “protect the consuming public and legitimate business enterprises from those who engage in unfair methods of competition, or unconscionable, deceptive, or unfair acts or practices in the conduct of any trade or commerce.” *Id.* § 501.202(2).

180. Under Florida law, unconscionability exists where there is “an *absence of meaningful choice* on the part of one of the parties together with contract terms which are *unreasonably favorable to the other party*.” *Basulto v. Hialeah Auto.*, 141 So. 3d 1145, 1157 (Fla. 2014) (emphasis in original) (quoting *Williams v. Walker–Thomas Furniture Co.*, 350 F.2d 445, 449 (D.C.Cir.1965)). The absence of meaningful choice is generally referred to as procedural unconscionability, while the unreasonableness of terms is generally called substantive unconscionability. *Id.* Both procedural and substantive unconscionability must be present to a finding of unconscionability. *Id.*

181. FDUTPA broadly defines “trade or commerce” as “the advertising, soliciting, providing, offering, or distributing, whether by sale, rental, or otherwise, of any good or service, or any property, whether tangible or intangible, or any other article, commodity, or thing of value, wherever situated.” § 501.203(8), Fla. Stat.

182. Roblox has engaged in trade and commerce in Florida by, among other things, promoting, marketing, and advertising the Roblox platform to consumers in this State; by providing the services of its platform to users in this State in exchange for valuable consumer data; and by profiting off of transactions involving its virtual currency (Robux) in this State.

183. In the course of this trade and commerce, Roblox has engaged and continues to engage in the above unconscionable acts and practices. A company may not lure Florida's children under false pretenses of safety to an unprotected online environment that the company knows is a hunting ground for sexual predators. Roblox has done so by, among other things:

- a. Designing, offering, and maintaining a gaming platform without requiring age verification, where children can pretend to be adults and adults can pretend to be children;
- b. Designing, offering, and maintaining a gaming platform that is easily accessible to children without parental consent while actively cutting trust-and-safety costs and recruiting more adults to the platform;
- c. Designing, offering, and maintaining a gaming platform where openly pornographic and pedophilic content is readily available to young children;
- d. Designing, offering, and maintaining a gaming platform where anyone can easily communicate with young children and then execute the known predatory tactic of transitioning those communications to other chat-focused apps;
- e. Establishing, maintaining, and profiting from a virtual currency, Robux, that predators use to procure child sexual abuse material;
- f. Further endangering children by introducing features like Voice Chat and Roblox Connect; and

- g. Recruiting increasingly more child users by falsely representing to them and their parents that the platform is safe.

184. Roblox’s acts and practices are procedurally unconscionable because they offer Florida consumers, including children, take-it-or-leave-it terms to use the platform and do not provide Florida consumers with a reasonable opportunity to understand the terms of use. Moreover, Florida children do not have a realistic opportunity to bargain regarding the terms of the contract.

185. Roblox’s acts and practices are substantively unconscionable because they mislead Florida consumers, including children, about the safety of the platform and fail to implement even modest safety features that would protect child users from adult predators.

186. Roblox knew or should have known that these acts and practices are unfair under FDUTPA.

187. These violations subject Roblox to civil penalties and injunctive relief under FDUTPA. Florida consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of these violations. Absent injunctive relief, Roblox is likely to continue to harm Florida consumers and the public interest.

188. Any person or corporation “who is willfully using, or has willfully used, a method, act, or practice declared unlawful under [§ 501.204, Fla. Stat.] . . . is liable for a civil penalty of not more than \$10,000 for each such violation.” § 501.2075, Fla. Stat. A violation is “willful” if the defendant “knew or should have known that [its] conduct was unfair or deceptive.” *Id.*

**COUNT III**  
**Violation of the Florida Deceptive and Unfair Trade Practices Act**  
**§ 501.204, Fla. Stat.**  
**(Deceptive Acts or Practices)**

189. Plaintiff realleges and incorporates by reference the factual allegations set forth in paragraphs 1–167 above as though fully alleged herein.

190. FDUTPA prohibits “[u]nfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce.” § 501.204(1), Fla. Stat. Its provisions are “construed liberally” to “protect the consuming public and legitimate business enterprises from those who engage in unfair methods of competition, or unconscionable, deceptive, or unfair acts or practices in the conduct of any trade or commerce.” *Id.* § 501.202(2).

191. Under FDUTPA, a “deceptive act” is any “representation, omission, or practice that is likely to mislead the consumer acting reasonably in the circumstances, to the consumer’s detriment.” *PNR, Inc. v. Beacon Prop. Mgmt., Inc.*, 842 So. 2d 773, 777 (Fla. 2003) (quotation marks omitted).

192. FDUTPA broadly defines “trade or commerce” as “the advertising, soliciting, providing, offering, or distributing, whether by sale, rental, or otherwise, of any good or service, or any property, whether tangible or intangible, or any other article, commodity, or thing of value, wherever situated.” § 501.203(8), Fla. Stat.

193. Roblox has engaged in trade and commerce in Florida by, among other things, promoting, marketing, and advertising the Roblox platform to consumers in this State; by providing the services of its platform to consumers in this State in exchange for valuable consumer data; and by profiting off of transactions involving its virtual currency (Robux) in this State.

194. In the course of this trade and commerce, Roblox has made multiple deceptive representations and omissions, including by:

- a. Falsely assuring the public that its app is safe for children, despite knowing that young Roblox users are exposed to inappropriate content, sexual and otherwise, and frequently targeted by adult predators;
- b. Falsely, misleadingly, and deceptively representing that Roblox had taken “every precaution possible” to protect children, while knowingly failing to implement available procedures that would actually protect young users in Florida;
- c. Falsely, misleadingly, and deceptively representing that Roblox is “a safe, moderated place,” while knowing that predators easily circumvent even the existing moderation procedures to target children in Florida;
- d. Falsely, misleadingly, and deceptively representing that Roblox has a zero-tolerance policy for obscenities and inappropriate content, when such content is widely present on the platform;
- e. Falsely, misleadingly, and deceptively representing that safety is Roblox’s top priority while actively undermining safety in the pursuit of profit;
- f. Falsely, misleadingly, and deceptively representing that, “[i]f your child is under 13, we make it extremely difficult for strangers on Roblox to contact them,” when adult strangers can freely contact children under thirteen in Roblox experiences and by friending those children;<sup>189</sup>

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<sup>189</sup> *Age Appropriate Design Code FAQs*, Roblox, <https://web.archive.org/web/20211011142335/https://en.help.roblox.com/hc/en-us/articles/4406238486676-Age-Appropriate-Design-Code-FAQs> (archived Oct. 11, 2021).

- g. Falsely, misleadingly, and deceptively representing that Roblox “reviews every uploaded image, video, and audio file used within our games to make sure they are safe and age appropriate” before that content is made available to users;<sup>190</sup> and
- h. Falsely, misleadingly, and deceptively claiming that bad actors are “dealt with swiftly” and that Roblox “remove[s] any content that’s reported to us within minutes” while failing to devote the trust-and-safety resources needed to do so.<sup>191</sup>

195. Roblox has also misled and deceived Florida consumers by withholding the material dangers that its platform presents to children, *i.e.*, the high volume of sexual and inappropriate content and high risk of sexual predators—including registered sex offenders—on its platform.

196. Roblox has known that its representations and omissions are false, deceptive, and misleading as it has transacted and continued to transact with Florida consumers. Roblox knew or should have known that these representations and omissions were likely to mislead consumers acting reasonably in the circumstances, to the consumers’ detriment. Florida children have fallen victim to predators as a result.

197. These violations subject Roblox to civil penalties and injunctive relief under FDUTPA. Florida consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of these violations. Absent injunctive relief, Roblox is likely to continue to harm Florida consumers and the public interest.

198. Any person or corporation “who is willfully using, or has willfully used, a method, act, or practice declared unlawful under [§ 501.204, Fla. Stat.] . . . is liable for a civil penalty of

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<sup>190</sup> Chris Pollard, *supra* note 144.

<sup>191</sup> Into the Metaverse, *supra* note 150.

not more than \$10,000 for each such violation.” § 501.2075, Fla. Stat. A violation is “willful” if the defendant “knew or should have known that [its] conduct was unfair or deceptive.” *Id.*

**COUNT IV**  
**Violation of the Florida Deceptive and Unfair Trade Practices Act**  
**§ 501.203(3), Fla. Stat.**

199. Plaintiff realleges and incorporates by reference the factual allegations set forth in paragraphs 22–25, 28–30, 33–34, 39, and 54–57 above as though fully alleged herein.

200. FDUTPA prohibits “[u]nfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce.” § 501.204(1), Fla. Stat.

201. A defendant violates FDUTPA when it violates “[a]ny law, statute, rule, regulation, or ordinance which proscribes unfair methods of competition, or unfair, deceptive, or unconscionable acts or practices.” *Id.* § 501.203(3).

202. The Children’s Online Privacy Protection Act (“COPPA”) regulates unfair and deceptive acts and practices in connection with the collection and use of personal information from and about children on the internet. COPPA makes it unlawful for “an operator of a website or online service directed to children, or any operator that has actual knowledge that it is collecting personal information from a child, to collect personal information from a child in a manner that violates the regulations prescribed under subsection (b).” 15 U.S.C. § 6502(a)(1).

203. Pursuant to Section 6502(b), operators must (1) provide written notice of what information the operator collects from children, how the operator uses such information, and the operator’s disclosure practices for such information; (2) obtain verifiable parental consent for the collection, use, or disclosure of personal information from children; (3) provide reasonable means for a parent to review the personal information collected from a child and to refuse to permit its further use or maintenance; (4) not condition a child’s participation in a game or another activity

on the child disclosing more personal information than is reasonable necessary to participate in such activity; and (5) establish and maintain reasonable procedures to protect the confidentiality, security, and integrity of personal information collected from children. *See* 16 C.F.R. § 312.3.

204. The term “child” is defined by 15 U.S.C. § 6501(1) “to mean an individual under the age of 13.”

205. The term “verifiable parental consent” is defined by 15 U.S.C. § 6501(9) to mean:

any reasonable effort (taking into consideration available technology), including a request for authorization for future collection, use, and disclosure described in the notice, to ensure that a parent of a child receives notice of the operator’s personal information collection, use, and disclosure practices, and authorizes the collection, use, and disclosure, as applicable, of personal information and the subsequent use of that information before that information is collected from that child.

206. Roblox is an “operator” under COPPA because it is a company that operates an online service for commercial purposes and collects or maintains personal information from or about the users of said online service. *Id.* § 6501(2).

207. Roblox directs its online platform towards children under the age of 13.

208. Roblox has actual knowledge that children under the age of 13 are on its online platform and that users under the age of 13 often use false dates of birth in order to gain full access to Roblox’s platform.

209. Before consumers even create a Roblox account—and thus before they or their parents are shown or agree to Roblox’s terms of service—Roblox begins collecting personal data, including personal identifying information unique to a user’s device that is shared and used for advertising purposes.

210. This collection of personal data occurs regardless of a user’s age. Roblox fails to provide notice to parents about the information they collect from children, how they use such information, and their disclosure practices in violation of 16 C.F.R. §§ 312.4(b)–(c).

211. Roblox has also collected personal data—including, but not limited to, location, contact data, linked social media accounts, cell phone numbers, and audio and video recordings—of children under the age of 13 who have been able to sign up for adult Roblox accounts due to Roblox’s lack of age verification.

212. Roblox has failed and continues to fail to provide sufficient notice on its online platform about the information it collects from children, how it uses such information, and its disclosure practices, in violation of 16 C.F.R. § 312.4(d).

213. Roblox has failed and continues to fail to obtain verifiable parental consent before collecting or using children’s personal information, in violation of 16 C.F.R. § 312.5.

214. Roblox’s collection and use of data from Florida consumers under 13 years old, in violation of COPPA and its implementing regulations, is an unfair practice and a violation of FDUTPA by virtue of § 501.203(3) Fla. Stat. Protecting the personal information of children under 13 from unauthorized collection is a well-established objective underlying public policy nationally and in Florida.

215. Florida consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of Roblox’s violations of FDUTPA and COPPA. Absent injunctive relief by this Court, Roblox is likely to continue to injure consumers and harm the public interest.

**COUNT V**  
**Violation of the Florida Deceptive and Unfair Trade Practices Act**  
**§ 501.1735, Fla. Stat.**

216. Plaintiff realleges and incorporates by reference the factual allegations set forth in paragraphs 1–167 above as though fully alleged herein.

217. Florida law imposes special prohibitions on an “online platform that provides an online service, product, game, or feature likely to be predominantly accessed by children[.]” § 501.1735(2), Fla. Stat.

218. Such online platforms cannot:
- (a) Process the personal information of any child if the online platform has actual knowledge of or willfully disregards that the processing may result in substantial harm or privacy risk to children;
  - (b) Profile a child unless the online platform can demonstrate that it has appropriate safeguards in place to protect children and profiling is necessary to provide the online service, product, or feature requested for the aspects of the online service, product, or feature with which the child is actively and knowingly engaged (or the online platform can demonstrate a compelling reason that profiling does not pose a substantial harm or privacy risk to children);
  - (c) Collect, sell, share, or retain personal information that is not necessary to provide an online service, product, or feature with which a child is actively and knowingly engaged unless the online platform can demonstrate a compelling reason that collecting, selling, sharing, or retaining the personal information does not pose a substantial harm or privacy risk to children;
  - (d) Use personal information of a child for any reason other than the reason for which the personal information was collected, unless the online platform can demonstrate a compelling reason that the use of the personal information does not pose a substantial harm or privacy risk to children;
  - (e) Collect, sell, or share any precise geolocation data of children unless the collection of the precise geolocation data is strictly necessary for the online platform to provide the service, product, or feature requested and then only for the limited time that the collection of the precise geolocation data is necessary to provide the service, product, or feature; or
  - (f) Collect any precise geolocation data of a child without providing an obvious sign to the child for the duration of the collection that the precise geolocation data is being collected.

*Id.* §§ 501.1735(2)(a)–(f).

219. Under § 501.1735, Fla. Stat., “online platform” means a social media platform as defined in § 112.23(1), Fla. Stat., online game, or online gaming platform. *Id.* § 501.1735(1)(e).

220. Roblox is an online gaming platform that provides online services, products, games, and/or features likely to be predominantly accessed by children and therefore is subject to § 501.1735, Fla. Stat.

221. Roblox was originally designed as an app for children and it continues to advertise itself as an online gaming platform for children. The majority of its player base consists of users under the age of 18.<sup>192</sup>

222. Under § 501.1735, Fla. Stat., “Child” or “children” means a consumer or consumers who are under 18 years of age.

223. Under § 501.1735, Fla. Stat., “[s]ubstantial harm or privacy risk to children” means the processing of personal information in a manner that may result in any reasonably foreseeable substantial physical injury, economic injury, or offensive intrusion into the privacy expectations of a reasonable child under the circumstances, including:

- a. Mental health disorders or associated behaviors, including the promotion or exacerbation of self-harm, suicide, eating disorders, and substance abuse disorders;
- b. Patterns of use that indicate or encourage addictive behaviors;
- c. Physical violence, online bullying, and harassment;
- d. Sexual exploitation, including enticement, sex trafficking, and sexual abuse and trafficking of online sexual abuse material;
- e. Promotion and marketing of tobacco products, gambling, alcohol, or narcotic drugs as defined in Section 102 of the Controlled Substances Act, 21 U.S.C. § 802; or

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<sup>192</sup> Roblox’s 2025 SEC 10-K Form reveals that 56 percent of Roblox users are 16 years of age and younger. Twenty-five percent of its users are 17 to 24 years of age. Roblox Corp., SEC Form 10-K, at 9, <https://www.sec.gov/Archives/edgar/data/1315098/000155837025004965/rblx-20250331xars.pdf> (last visited Nov. 24, 2025).

f. Predatory, unfair, or deceptive marketing practices or other financial harms.

224. Roblox processes Florida Children’s personal information while knowing that the processing of this personal information may lead to substantial harm or privacy risk for Children, in violation of § 501.1735(2)(a), Fla. Stat., yet disregarding the consequences. For example, Roblox’s voice chat technology processes Children’s biometric information even though Roblox knows that this allows predators to engage Children in conversations that lead the Child to be identifiable on and off the platform. Roblox also knows that this processing of personal information leads to the sexual abuse, exploitation, and trafficking of online sexual abuse material of Children who use their platform.

225. Roblox processes the personal information of Florida Children by enabling “Player Tokens,” which tie directly to all consumers regardless of age, while knowing that this allows predators to engage Children in conversations and allows for the Child to be identifiable on an off the platform. Roblox does not change these tokens for Children as the Children switch between games on the platform, enabling predators to match a Child user to his or her token and then stalk the Child across the platform. Roblox knows that this processing of personal information leads to the sexual abuse, exploitation, harassment, and trafficking of online sexual abuse material of Children who use their platform.

226. Roblox processes the personal information of Florida Children by enabling in-game chat technology for all consumers, regardless of age, while knowing that this allows predators to engage Children in conversations that allows for the Child to be identifiable on and off the platform. Roblox knows that this processing of personal information also leads to the sexual abuse, exploitation, and trafficking of online sexual abuse material of Children who use their platform.

227. Roblox has processed and used the personal information of Florida children for purposes both unrelated and unnecessary to providing access to its online platform, such as by distributing that personal information to third parties for profit and advertising, in violation of § 501.1735(2)(a)–(d), Fla. Stat.. These actions are taken with knowledge or willful disregard of the fact that the processing and use of children’s personal information could result in substantial harm or privacy risk to those children.

228. Each violation of § 501.1735(2), Fla. Stat., constitutes an unfair and deceptive trade practice under FDUTPA. *See* §§ 501.1735(4)(a), 501.204(1), Fla. Stat.

229. Florida consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of Roblox’s violations of FDUTPA. Absent injunctive relief by this Court, Roblox is likely to continue to injure consumers and harm the public interest.

230. Pursuant to § 501.1735(4)(a), Fla. Stat., Florida is entitled to civil penalties of up to \$50,000 per violation of § 501.1735(2), Fla. Stat. These penalties may be tripled for each violation where Roblox has actual knowledge that a Florida child is under 18 years of age.

231. All conditions precedent to bringing this action have been met.

### **PRAYER FOR RELIEF**

WHEREFORE, the Attorney General requests that the Court:

- A. Enter judgment in favor of the Attorney General and against Roblox for violations of FDUTPA, COPPA, and § 501.1735, Fla. Stat.;
- B. Permanently enjoin Roblox from engaging in the acts and practices set forth above that violate FDUTPA, COPPA, or § 501.1735, Fla. Stat.;
- C. Award civil penalties, up to \$10,000 per violation, for Roblox’s willful violations of FDUTPA under § 501.2075, Fla. Stat.;

- D. Award civil penalties of up to \$150,000 per violation for Roblox’s violations of § 501.1735, Fla. Stat.;
- E. Award attorney’s fees and costs under §§ 501.2075, 501.2105, Fla. Stat.; and
- F. Grant such other and further legal or equitable relief as the Court may deem just and proper.

**DEMAND FOR A JURY TRIAL**

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

Date: December 11, 2025

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forthcoming

Respectfully submitted,

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