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Superior Court of California,
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6/11/2026 8:12 AM
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8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

10 STATE OF ARKANSAS, *ex rel.*
11 TIM GRIFFIN, ATTORNEY GENERAL,

12 Plaintiff,

13 vs.

14 ROBLOX CORPORATION and DISCORD
15 INC.,

16 Defendants

Case No.: 26STCV18664

COMPLAINT FOR DAMAGES

1. **Arkansas Public Nuisance Law**
2. **Violation of Arkansas's
Deceptive Trade Practices Act
(§ 4-88-101, et. seq.)**
3. **Violation of Arkansas's
Deceptive Trade Practices Act
— False Representations as to
Product Characteristics (Ark.
Code Ann. § 4-88-107(a)(1))**
4. **Unjust Enrichment**

**Jury Trial Requested on All Causes of
Action so Triable**

1 I. INTRODUCTION

2 1. Sexual predators no longer need candy or a van. They don't even need a cute little
3 puppy. Today, they have Roblox—a platform that leaves the front door unlocked with a sign that
4 says “children inside.” And when Roblox hands a predator a child's trust, Discord hands them a
5 secret private room without parents.

6 2. Defendants Roblox Corporation (“Roblox”) and Discord Inc. (“Discord”) have
7 each spent years marketing their platforms as safe, family-friendly digital spaces where children
8 can play, create, and connect. Roblox calls itself “the #1 gaming site for kids and teens”¹ and
9 assures parents it takes “every precaution possible” to protect children.² Discord promises a “zero-
10 tolerance policy” for the sexual exploitation of minors and proclaims that “safety is at the core of
11 everything we do.”

12 3. Those assurances were false. Roblox is tantamount to a breeding ground for sexual
13 predators and the sexual exploitation of minors. The children who log on and play Roblox are
14 typically between 9 and 15 years old—many as young as 6 to 8.³ Predators know this. They pose
15 as fellow children, complete with avatar disguises and, increasingly, voice-modifying technology
16 that allows adult men to sound like children in real-time voice chat. Roblox grants these predators
17 unrestricted access to its youngest users through the same platform features that make Roblox so
18 appealing to children in the first place: a sense of community, virtual rewards such as Roblox's
19 online money called “Robux,” and social interaction built around shared play. Every feature that
20 is designed to hook a child is also a tool a predator can exploit.

21 4. When publicly pressed about Roblox's child-safety record, co-founder and CEO
22 David Baszucki appeared indifferent at best, treating the threat posed by predators targeting
23 children on the platform as “an opportunity” instead of an urgent child-safety crisis.

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

27 ² YouTube, Digital Civility Panel (Oct. 23, 2019),
https://www.youtube.com/watch?v=XoUs1Js7WG0&list=PLcKphP00N1_kCLjvcOWdwbegJkNSL-CuL&index=6.

28 ³ [Roblox's own annual report shows 40% of its 144 million daily users are children under 13—with 20% under the age of nine.](#)

1 5. What “breeding ground” means in practice cannot be underscored. Roblox’s
2 algorithm was built to recommend different online “experiences” to children, and for over a
3 decade, the experiences it recommended included simulations of criminal conduct and sexual
4 activity. Roblox permitted developers to build environments where users could remove their
5 avatars’ clothing, expose virtual nudity, and engage in simulated sexual activity with other users,
6 some of those users are children **as young as six**. The platform hosted virtual strip clubs where
7 avatars performed sexual acts. It hosted games, rated for users as young as nine, that simulated
8 sexual activity.⁴ It hosted games that gamified and trivialized rape. In one instance, a mother
9 watched in real time as her seven-year-old daughter’s avatar was sexually assaulted on a virtual
10 playground by two adult male avatars. “I never in my wildest dreams would’ve ever imagined that
11 I would have to talk with my seven-year-old about rape,” she said afterward.⁵ Roblox knew all of
12 this and not only turned a blind eye but embraced the reality that more users meant more revenue,
13 even when that revenue came at the expense of children’s innocence and safety. Roblox
14 affirmatively decided whether avatars could appear nude and deliberately declined to implement
15 protections that would prevent children from accessing nudity or communicating with adults.
16 These were not content-moderation failures; they were conscious product-design decisions.

17 6. Roblox did not merely inherit this ecosystem. It built it. And Roblox knowingly
18 and/or recklessly designed its platform without necessary guardrails to protect kids from predators
19 and harm. Roblox supplied the scripting tools that developers used to create this content. It trained
20 developers—paying them up to \$13,000 apiece—to build more experiences for the platform. It
21 designated the overwhelming majority of these experiences “All Ages (Suitable to everyone)”—
22 its own label—making them accessible to every child on the platform without restriction. Roblox
23 also developed a way to monetize what predators could use to lure and coerce children. Roblox
24 collected a transaction fee every time its online money system (Robux) was exchanged and moved
25 through the ecosystem it created. Roblox is not a passive host of other people’s choices. It is the

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27 ⁴ See, e.g., YouTube, *How to Do Roblox Sex Glitch*, https://www.youtube.com/watch?v=Zz97Q1SQE_k; see also
28 YouTube, *Roblox Sex?*, <https://www.youtube.com/watch?v=hyqCHG6nUYI>.

⁵ 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>.

1 architect of the environment in which those choices were made. Roblox’s platform, through its
2 design and hollow “safety measures”, is now the first point of contact for predators and children.⁶

3 7. Roblox had direct evidence that its choices and platform were causing harm, and
4 knew it was getting worse. Its own mandatory disclosures to the National Center for Missing and
5 Exploited Children documented 675 instances of suspected child sexual exploitation in 2019. By
6 2023, that figure had climbed to over 13,000, a nearly twentyfold increase that Roblox’s safety
7 investments did nothing to reverse. When one of its own developers (a man who had been
8 victimized on the platform as a child) assembled a team that resulted in the arrest and criminal
9 conviction of six predators across the United States, Roblox’s response was the opposite of what
10 would be expected of someone taking sexual exploitation of minors seriously. Roblox sent a cease-
11 and-desist letter, banned accounts associated with catching the bad guys, and described the efforts
12 to identify and catch predators as “harmful activit[y]” similar to “actual predators.” The company
13 that classified child-safety spending as a drag on earnings moved swiftly and decisively to silence
14 the person getting predators arrested.

15 8. Once a predator has a child’s trust, Discord is the room predators quickly lure kids
16 into. Discord has become one of the most-cited platforms in federal child-exploitation prosecutions
17 partially because it is built around anonymous servers, unmonitored direct messages, and voice
18 and video chat with no meaningful age verification. Discord allows users as young as 13, and at
19 least 28% of children age 13-17 use Discord.⁷ Discord has known this for years and has taken
20 deliberate steps to grow its young user base while systematically avoiding the commonsense safety
21 investments that would have protected its users. Discord compounded the danger through
22 deliberate product design. Its own documentation tells children directly that *they* control whether
23 their parents can monitor their Discord activity—and that *they* can revoke parental access at any
24 time. Discord describes this as a privacy feature. It functions as a structural protection for predators

26 ⁶ National Center on Sexual Exploitation, *The D_i_r_t_y__D_o_z_e_n__L_i_s_t__'2_4_:_:_Roblox, A*
27 *Mainstream Contributor to Sexual Exploitation*, <https://endsexualexploitation.org/roblox/> (last updated Dec. 4,
2024).

28 ⁷ <https://www.pewresearch.org/internet/2023/12/11/teens-social-media-and-technology-2023/>

1 who rely on parental ignorance to operate. Discord’s own transparency reports confirm the result:
2 in a single quarter, child safety violations on its platform increased by 150%.

3 9. Putting profits over safety, these platforms don’t simply tolerate these dangers—
4 they monetize them to the tune of billions a year. Roblox generated approximately \$3.6 billion in
5 revenue this past year. Discord has been valued at over \$14 billion. Well aware of the predatory
6 activity on their platforms for years, both companies have responded with public relations
7 campaigns rather than genuine safety investment. Roblox has only recently begun making online
8 safety changes, which still fall far short of what is needed to protect the children of Arkansas.

9 10. The predatory pattern is systematic: a predator uses Roblox to identify, befriend,
10 and groom a child and then migrates that child to Discord where exploitation escalates
11 into soliciting nude images, manufacturing sextortion leverage, and in case after case, arranging in-
12 person meetings that result in rape and other violent sexual assault. Roblox and Discord have
13 designed their platforms to work together seamlessly, including by allowing Discord links in
14 Roblox game pages and enabling users to link accounts across both platforms. The two-platform
15 pipeline is not a bug. It is a foreseeable consequence of deliberate design choices made by two
16 companies that chose growth and money over the safety of children.

17 11. These platforms were not designed with children’s safety in mind. Instead, they
18 were designed to protect Roblox’s bottom line and Wall Street appeal. The business decision is
19 simple: profits trump safety, and increased safety measures threaten profits. For example, Roblox’s
20 algorithm routes child accounts toward the most popular experiences, including the ones where
21 predators know to wait. While failing to effectively address predators’ access to kids, Roblox has
22 now pursued a deliberate strategy to introduce adult users into the same integrated environment as
23 children. The CEO publicly described this effort as an “aging up” initiative and ensured that the
24 adult experiences this initiative created were still accessible to every child on the platform without
25 any age-based restrictions. Further, as noted above, Roblox created a currency system that lets any
26 adult send money directly to any child’s account, with no limit, no monitoring, and no parental
27 approval required. Its account registration asks for nothing that can be verified and takes less than
28 sixty seconds to complete.

1 12. Likewise, Discord defaults to settings that let strangers message children directly
2 and gives children the ability to undo any safeguards a parent manages to put in place.

3 13. The foregoing design features in Roblox and Discord are not content moderation
4 failures. They are intentional engineering decisions. Arkansas holds Roblox and Discord
5 accountable not just for what strangers posted on their platforms, but for what their own engineers
6 chose to build into them.

7 14. Roblox has offered parents little more than platitudes, telling parents and the public
8 what people wanted to hear about safety while continuing to design and scale a platform that lures
9 kids into dangerous situations with predators. Roblox’s misrepresentations and deceptive conduct
10 about its safety created a pipeline from online to real-world sexual violations. The results for
11 Arkansas families are devastating. Arkansas children—disproportionately young, rural, and with
12 limited access to alternative social resources—have been targeted, groomed, sextorted, and
13 exposed to sexual material. Arkansas schools, healthcare providers, law enforcement agencies, and
14 families have borne the costs.⁸

15 15. Roblox and Discord have repeatedly failed our community. They have refused to
16 act responsibly and instead let greed trump common sense and morality. This lawsuit is necessary
17 to protect the Arkansas youth, their families, and our communities.

18 16. The Attorney General brings this action pursuant to the Arkansas Deceptive Trade
19 Practices Act (“ADTPA”), Ark. Code Ann. § 4-88-101, et seq., and Arkansas common law
20 governing public nuisance and unjust enrichment. The State seeks injunctive relief, civil penalties,
21 damages, restitution, and abatement.

22 17. Roblox’s and Discord’s actions and inaction have and continue to harm the youth
23 of Arkansas, their families, and communities. These companies have helped predators, helped their
24 bottom lines, and the damage to Arkansas children is permanent.

25 ⁸ [https://www.thv11.com/article/news/local/roblox-snapchat-sexploitation-lawsuit-arkansas/91-42a56f74-840f-486e-](https://www.thv11.com/article/news/local/roblox-snapchat-sexploitation-lawsuit-arkansas/91-42a56f74-840f-486e-b7e0-d5c229e04b34)
26 [b7e0-d5c229e04b34](https://www.thv11.com/article/news/local/roblox-snapchat-sexploitation-lawsuit-arkansas/91-42a56f74-840f-486e-b7e0-d5c229e04b34); [https://www.nwaonline.com/news/2024/feb/03/benton-county-sheriffs-office-wants-kids-to-](https://www.nwaonline.com/news/2024/feb/03/benton-county-sheriffs-office-wants-kids-to-play/)
27 [play/](https://www.nwaonline.com/news/2024/feb/03/benton-county-sheriffs-office-wants-kids-to-play/).

1 **II. THE PARTIES**

2 16. Plaintiff is the State of Arkansas, ex rel. Tim Griffin, Attorney General. Attorney
3 General Griffin is the chief legal officer of the State of Arkansas. Under Ark. Code Ann. §§ 4-88-
4 104 and 4-88-113, the Office of the Attorney Gebneral (“OAG”) may seek civil enforcement of
5 the ADTPA. Attorney General Griffin also brings this case pursuant to his common law *parens*
6 *patriae* authority to protect the safety, health, and economic well-being of Arkansans. Attorney
7 General Griffin does not bring this action on behalf of any agency of the State of Arkansas.

8 17. Defendant Roblox Corporation is a Nevada corporation with its principal place of
9 business in San Mateo, California. Roblox owns, operates, controls, produces, designs, maintains,
10 manages, develops, tests, labels, markets, advertises, promotes, supplies, and distributes the
11 Roblox platform and application. Roblox is widely available to consumers throughout the United
12 States, including in the State of Arkansas. At all relevant times, Roblox, including through its
13 executives, collectively directed, controlled, had the authority to control, or participated in all
14 aspects of the strategy, operation, planning, management, policies, design, and development of its
15 interactive gaming platform, including in the acts and practices set forth in this Complaint.

16 18. Defendant Discord Inc. is a Delaware corporation with its principal place of
17 business in San Francisco, California. Discord owns, operates, controls, produces, designs,
18 maintains, manages, develops, tests, labels, markets, advertises, promotes, supplies, and distributes
19 the Discord application. Discord is widely available to consumers throughout the United States,
20 including in the State of Arkansas. At all relevant times, Discord, including through its executives,
21 collectively directed, controlled, had the authority to control, or participated in all aspects of the
22 strategy, operation, planning, management, policies, design, and development of its
23 communications platform, including in the acts and practices set forth in this Complaint.

24 19. As detailed in the allegations below, Roblox and Discord have each engaged, and
25 continue to engage, in unfair, deceptive, unconscionable, and unlawful activity in Arkansas.

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1 **III. JURISDICTION AND VENUE**

2 20. This Court has jurisdiction over this action under Ark. Code Ann. §§ 4-88-104 and
3 16-4-101, as well as under the common law of the State of Arkansas.

4 21. Ark. Code Ann. § 4-88-113(d)(1) confers personal jurisdiction to this Court over
5 each Defendant as it relates to the OAG’s ADTPA claims. The ADTPA defines “person” to include
6 any individual, organization, partnership, or corporation. Ark. Code Ann. § 4-88-102(6). Each
7 person subject to liability under Ark. Code Ann. § 4-88-113(d)(1) shall be deemed, as a matter of
8 law, to have purposely availed himself or herself of the privileges of conducting activities within
9 Arkansas sufficient to subject the person to the personal jurisdiction of the Court. Ark. Code Ann.
10 § 4-88-113(d)(3).

11 22. This Court has personal jurisdiction over each Defendant in this matter under Ark.
12 Code Ann. § 16-4-101, as each conducts business in Arkansas, purposefully directed its actions at
13 Arkansas and its citizens, and has the requisite minimum contacts with Arkansas necessary for this
14 Court to exercise jurisdiction.

15 23. Roblox has purposefully availed itself of the privilege of doing business in
16 Arkansas. Roblox has marketed, directed, and operated its platform within Arkansas; solicited the
17 creation of new user accounts by directing marketing materials within the State; derived substantial
18 revenue by marketing, directing, and operating its platform to and for youth users within Arkansas;
19 and made material misrepresentations about its products that Roblox knew or should have known
20 would be heard by and relied upon by Arkansans.

21 24. Discord has likewise purposefully availed itself of the privilege of doing business
22 in Arkansas. Discord has marketed, directed, and operated its application within Arkansas;
23 solicited the creation of new user accounts from Arkansas residents; derived substantial revenue
24 from subscriptions and advertising delivered to Arkansas users; and made material
25 misrepresentations about its products that Discord knew or should have known would be heard by
26 and relied upon by Arkansans.

27 25. The causes of action within this Complaint arise from or relate to Defendants’
28 contacts with the State of Arkansas and its citizens.

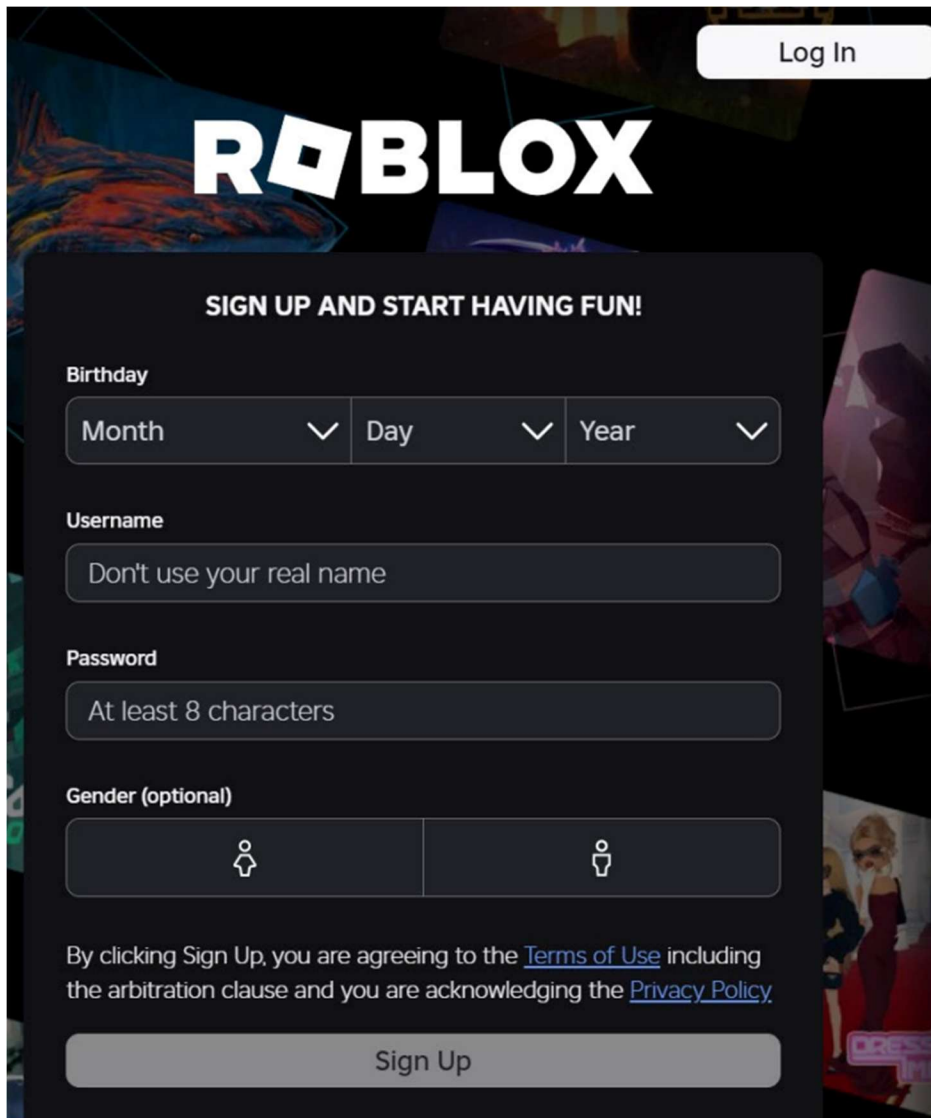
1 experience.”⁹ That architecture, which encourages ongoing social bonds between users who may
2 never have otherwise met offline, is precisely what makes the platform exploitable by predators
3 who depend on trust developed over time.

4 31. In less time than it takes a child to check out a library book, a minor—or a predator
5 posing as one—can create a fully functional Roblox account. There is no age minimum. There is
6 no requirement for parental consent. No one is asked to verify any of the information provided.
7 Users can claim to be any age and create as many accounts as they wish. This design allows
8 children to access adult-oriented content and invites adult predators to easily pose as children.
9 Roblox’s sign-up screen even prompts users: “SIGN UP AND START HAVING FUN!” Roblox’s
10 ready, set, go approach simply requires a user to input a birthday, a username, and a password, and
11 then the hunting begins.

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27 ⁹ David Baszucki, Co-founder and CEO of Roblox, *The CEO of Roblox on Scaling Community-Sourced Innovation*,
28 Har. Bus. Rev., The Magazine (Mar.-Apr. 2022), <https://hbr.org/2022/03/the-ceo-of-roblox-on-scaling-community-sourced-innovation>.



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32. The fact that Roblox does not use age verification technology when users set up an account is not due to a lack of technology or impracticability. It is a conscious business choice to put business and growth over children and safety. In fact, Roblox has this very technology and uses it in other instances on its platform. Roblox has long possessed facial-recognition age-verification technology that cross-references a live selfie against a government-issued photo ID. This is software Roblox deploys elsewhere on its own platform but deliberately withholds at the account-creation step. Former employees have confirmed that Roblox considered requiring

1 verifiable parental consent but ultimately decided against it out of fear that such a requirement
2 would drive users away.¹⁰

3 33. Roblox generates revenue primarily through *Robux*, its proprietary virtual currency.
4 And anyone can purchase Robux gift cards and gift Robux to other users. You have to use real
5 money to buy Robux, and Roblox collects a transaction fee with every exchange. Once a user has
6 Robux it can be used to make purchases and upgrades in the game (e.g., upgrading avatars,
7 changing avatar looks, digital content, and in-game advantages).

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The screenshot displays a promotional offer for Robux. The headline reads "Enjoy up to 25% more Robux". Below this, a sub-headline states "Get more Robux on computer, web, with gift cards, and on select platforms". The main content is a table comparing prices for Robux across two categories: "Other platforms" and "Computer, web & gift cards". The table lists various price points from \$2.99 to \$199.99. For each price point, the Robux amount is shown for both categories. In most cases, the "Computer, web & gift cards" category offers a higher amount of Robux for the same price, with the difference highlighted in a yellow box (e.g., "+1,500 more" for the \$199.99 tier).

Price	Other platforms	Computer, web & gift cards
\$199.99	22,500	24,000 (+1,500 more)
\$99.99	10,000	11,000 (+1,000 more)
\$49.99	4,500	5,250 (+750 more)
\$34.99		3,625
\$19.99	1,700	2,000 (+300 more)
\$14.99		1,500
\$9.99	800	1,000 (+200 more)
\$4.99	400	500 (+100 more)
\$2.99		270

21 Robux are highly coveted by children. Predators have systematically exploited this
22 dynamic, trading Robux for explicit photographs and using Robux as both bait and blackmail
23 leverage. Unfortunately, Roblox does not warn children or parents about this use of its currency
24 system. Even though Roblox is aware that predators use Robux as a tool to coerce children into
25 producing explicit material, it has taken no meaningful steps to prevent predators from sending
26 Robux to child accounts or to flag transaction patterns consistent with extortion. All the while,

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28 ¹⁰ *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, Hindenburg Research (Oct. 8, 2024), <https://hindenburgresearch.com/roblox/> (last visited April 26, 2026).

1 Roblox directly profits (through transaction fees) from exchanges that fund the sexual exploitation
2 of children.

3 34. The COVID-19 pandemic transformed Roblox from a popular children’s game into
4 a dominant place for social interaction for American youth. As schools shut down and children
5 were confined to their homes, Roblox became a primary substitute for playgrounds, classrooms,
6 and after-school socialization. By fall 2020, daily active users had surpassed 31 million, the
7 majority of whom were aged 13 or under. The number of Roblox users continues to increase:
8 Roblox’s most recent annual filings report 144 million daily active users,¹¹ with children under 13
9 representing approximately 40% of that total.¹² (According to Roblox’s 2024-25 Annual Report,
10 the demographic of active user accounts is 20% under 9, 20% from 9-12, 16% from 13-16, and
11 44% at 17 or older.) Based on information and belief, there are tens of thousands of children
12 logging onto Roblox in Arkansas with children users under 16 and tens of thousands also under 9
13 years of age. In other words, the majority of Roblox’s daily users are children. Roblox does not
14 stumble into this demographic; it cultivates it deliberately, marketing its outsized reach among
15 children and teenagers as a core selling point to advertisers and investors alike.

16 35. In 2021, Roblox went public at a valuation of \$41 billion, creating intense pressure
17 on its executives to prioritize revenue growth and engagement metrics above all else. Roblox
18 pursued growth and revenue to impress Wall Street with strong numbers, even if it meant weak
19 safety. Roblox’s CFO explicitly told investors that the company expected trust and safety costs to
20 “scale below linear” as the company grew, meaning safety investment would shrink as a
21 percentage of revenue even as the platform expanded.¹³ At an earnings call, Roblox’s CEO
22 highlighted that “our infrastructure and trust and safety expenditures were 8% lower year-on-year”
23 as a point of pride. To Roblox’s leadership, spending less money protecting children was a
24 competitive advantage worth boasting about. On Roblox’s fourth-quarter 2023 earnings call, CFO
25 Mike Guthrie stated the company’s goal was to reduce trust and safety costs from approximately

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27 ¹¹ Roblox Corporation Q4 2025 Shareholder Letter (Feb. 5, 2026)

28 ¹² Roblox Corporation 2025 Proxy Statement and 2024 Annual Report,
https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf.

¹³ Roblox Corp., Q4 2022 Earnings Call (Feb. 15, 2023).

1 11% of revenue down to “a high single-digit number over the next few years,” adding that “we
2 still think there’s more to do there.”¹⁴ At other times, Guthrie reassured investors that trust and
3 safety costs were growing “at a lower rate than our bookings growth.”¹⁵ The workforce data
4 confirms the priority: between 2022 and a recent reporting period, Roblox’s revenue more than
5 doubled (from \$2.225 billion to \$4.890 billion), while employee headcount increased only 16%
6 (from 2,128 to 2,474).¹⁶ Roblox chose to absorb more users and more revenue without building
7 the workforce required to protect them. Although Roblox grew its users, its revenue, and its
8 metrics, it didn’t increase its safety at scale.

9 36. As one former employee explained, Roblox knew the human cost of these
10 decisions: “You’re supposed to make sure that your users are safe but then the downside is that, if
11 you’re limiting users’ engagement, it’s hurting our metrics. It’s hurting the active users, the time
12 spent on the platform, and in a lot of cases, the leadership doesn’t want that.”¹⁷ That same employee
13 described the choice Roblox’s executives made without ambiguity: “You can keep your players
14 safe, but then it would be less of them on the platform. Or you just let them do what they want to
15 do. And then the numbers all look good and investors will be happy.” Roblox employees also
16 reported feeling explicit pressure to avoid any changes that could reduce engagement, even when
17 those changes would have protected children from predators. Roblox needed to show growth that
18 wasn’t dragged down by increased safety costs.

19 37. Wall Street reinforced this calculus. Barclays, for example, characterized increased
20 safety costs as a “negative” in Roblox’s quarterly earnings reports, and identified the “downside
21 case” for Roblox’s stock as “additional safety investments due to its younger demographic”
22 becoming a drag on earnings margins.¹⁸ Roblox’s executives were not operating in a vacuum—
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25 ¹⁴ Roblox Corp., Q4 2023 Earnings Call (Feb. 7, 2024).

26 ¹⁵ Roblox Corp., Q3 2022 Earnings Call (Nov. 8, 2023).

27 ¹⁶ Statista, Number of full-time Roblox employees worldwide (Apr. 30, 2026); Statista, Annual revenue of Roblox Corporation worldwide 2018–2025 (Apr. 30, 2026); Roblox Corp., Q4 2023 Earnings Call (Feb. 7, 2024); Roblox Corp., Q4 2022 Earnings Call (Feb. 15, 2023); Roblox Corp., Q3 2022 Earnings Call (Nov. 8, 2023)

28 ¹⁷ Hindenburg Research, Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids (Oct. 8, 2024)

¹⁸ Ross Sandler, Trevor Young & Alex Hughes, *Back on Track Following the IH Hiccup*, Barclays (Aug. 1, 2024).

1 they were making child safety decisions within a financial framework that treated protecting
2 children as a threat to shareholder value.¹⁹

3 38. Roblox’s executives simultaneously pursued a strategy to attract older users—a
4 demographic that “monetizes better” than children. At developer conferences, CEO Baszucki
5 encouraged developers to build experiences for adults and announced plans to facilitate “real-life
6 relationships” between users, avoiding the word “dating” while mocking his own safety team’s
7 concerns to audience laughter.²⁰ When asked about age-restricted content, Baszucki admitted that
8 “all ages” could still access experiences nominally restricted to users 13 and older. These decisions
9 created new and dangerous opportunities for adults to access and exploit children on the platform.²¹



16 **B. Roblox’s Deceptive Safety Representations**

17 39. Roblox’s success and continued growth has depended on constant false assurances
18 to parents that its platform is safe for children. These assurances have been made in every forum
19 possible: on Roblox’s website, in app store listings, through public statements by senior
20 executives, in news interviews, and on podcasts targeted at parents.

21 40. As early as 2007, Roblox’s website assured parents that Roblox is an “online virtual
22 playground . . . where kids of all ages can safely interact, create, have fun, and learn.”²² From 2008
23 through 2016, Roblox promised: “We take every precaution possible to make sure kids are
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25 ¹⁹ Ross Sandler, Trevor Young & Alex Hughes, Back on Track Following the 1H Hiccup, Barclays (Aug. 1, 2024).

26 ²⁰ Roblox Developers Conference 2023 Keynote (Sep. 8, 2023),
<https://www.youtube.com/watch?v=CwLThCghzA4>.

27 ²¹ Roblox Developers Conference 2023 Keynote (Sep. 8, 2023),
<https://www.youtube.com/watch?v=CwLThCghzA4>; Roblox Developers Conference 2024 Keynote (Sep. 6, 2024),
<https://www.youtube.com/watch?v=HwbcWc2CwnM>.

28 ²² Roblox, *Frequently Asked Questions (FAQs)*,
<https://web.archive.org/web/20071105104643/http://www.roblox.com/Parents/FAQs.aspx> (archived Nov. 5, 2007).

1 protected from inappropriate and offensive individuals as well as from indecent and distasteful
2 content.”²³

3 41. In 2017, Roblox began declaring that it “take[s] kids’ safety and privacy very
4 seriously” and “strive[s] to continually develop new and innovative technologies that will protect
5 the safety of our community.”²⁴ Roblox advertised its platform as “a safe, moderated place to meet,
6 play, chat, and collaborate on creative projects.”²⁵

7 42. Roblox’s false assurances have never stopped. On its current website, Roblox
8 declares that “Safety is in our DNA.”²⁶ It tells parents that it conducts a “safety review of every
9 uploaded image, audio, and video file” and that it staffs an “expertly trained team with thousands
10 of members dedicated to protecting our users.” Roblox’s Chief Safety Officer has stated that “any
11 time anything happens to a child that puts them at risk is one too many”²⁷—while separately
12 acknowledging to investors that preventing all inappropriate interactions is something the
13 company is “unable” to achieve.²⁸

14 43. In a November 2025 interview on a New York Times podcast, CEO Baszucki
15 revealed the depth of his indifference. When pressed by hosts on the platform’s child safety
16 record—specifically on removing chat features that allow predators to contact children—Baszucki
17 became terse, admonishing the hosts for their “superfocus” on child safety and complaining that
18 he thought “we were going to be talking about fun, funny things in the industry.” Most revealingly,
19 Baszucki described the problem of predators targeting children on Roblox not as a crisis to be
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22 ²³ Roblox, *Keeping Kids Safe*,
23 <https://web.archive.org/web/20080501101437/http://www.roblox.com/Parents/KeepingKidsSafe.aspx> (archived
24 May 1, 2008); *see also* Roblox, *Information for Parents*,
25 <https://web.archive.org/web/20160131063648/http://corp.roblox.com/parents> (archived Jan. 31, 2016).

26 ²⁴ Roblox, Parents’ Guide, <https://web.archive.org/web/20170716032712/https://corp.roblox.com/parents/> (archived
27 *Id.*

28 ²⁶ Roblox, *Safety Comes First on Roblox*, [https://corp.roblox.com/safety-civilityresources?
section=news&article=safety-comes-first-on-roblox](https://corp.roblox.com/safety-civilityresources?section=news&article=safety-comes-first-on-roblox) (article no longer available on Roblox website; last visited May
5, 2025).

²⁷ 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..](https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features..)

²⁸ Roblox Corp., S-1 (Securities Registration Statement), 24 (Nov. 19, 2020)

1 urgently addressed, but as “an opportunity.” He offered no elaboration on what that meant for the
2 children already harmed.

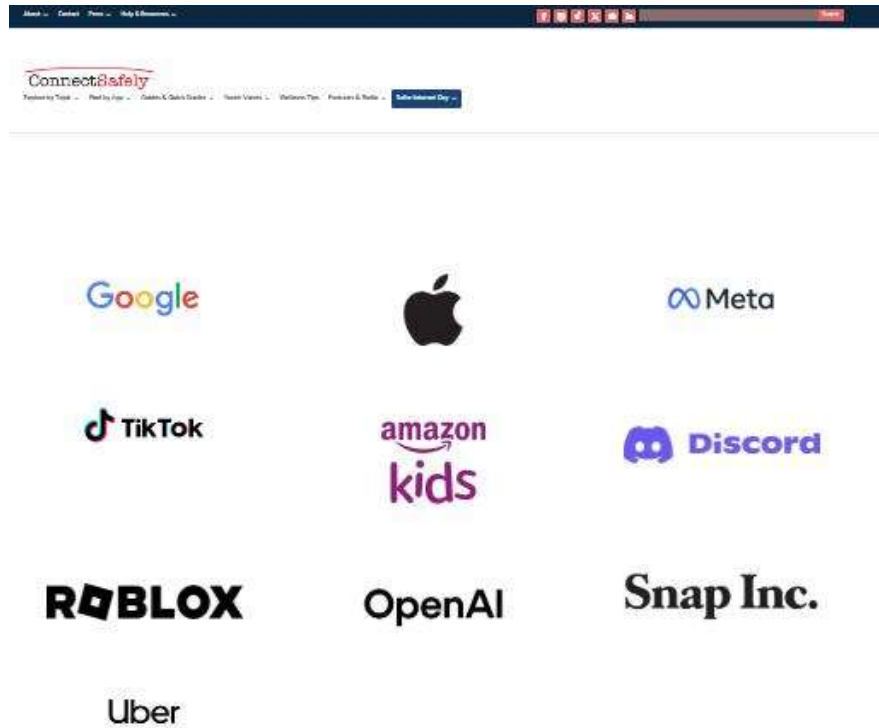
3 44. Roblox has similarly misled app stores. In the Apple App Store, Roblox self-reports
4 ratings that result in a “12+” designation with no warnings for sexual content or nudity—despite
5 the fact that sexual content pervades the platform. In Google Play and the Microsoft Store, Roblox
6 claims a “T” for “Teen” rating that excludes the “M” for “Mature” designation that its content
7 actually warrants.

8 45. Roblox also manufactured the appearance of independent third-party validation for
9 its safety record. ConnectSafely, which publicly lists Roblox as a financial “supporter” on its own
10 website, appeared repeatedly in Roblox press releases and earned-media coverage as an
11 independent voice endorsing Roblox’s safety features—seemingly without any disclosure of the
12 financial relationship. The Family Online Safety Institute (“FOSI”) is similarly entangled: a
13 Roblox Vice President, Tami Bhaumik, serves as FOSI’s board chair, a relationship that has never
14 been disclosed in the numerous press accounts quoting FOSI leaders praising Roblox’s safety
15 record.²⁹

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28 ²⁹ *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/>.



When Roblox announced new safety features in November 2024, ConnectSafely’s CEO was quoted calling Roblox a platform that “consistently provided parents with tools” to keep children safe, while a Newsweek article simultaneously quoted both ConnectSafely’s CEO and FOSI’s CEO praising Roblox as a responsible platform.³⁰ Neither article disclosed the financial and governance ties between those organizations and Roblox.³¹

Parents

³⁰ 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-onroblox>.

³¹ ConnectSafely, *Supporters*, <https://connectsafely.org/about-us/supporters/> (last accessed April 9, 2026).

1 In response to safety concerns, Roblox notes that the platform was
2 designed for kids and teens from the beginning, and they're committed to
3 making safety a priority. "We have a responsibility to make sure our players
4 can learn, create, and play safely," notes Tami Bhaumik, Vice President of
5 Civility & Partnerships at Roblox. "This continues to be our most important
6 priority and that will never change."

7 **C. The Reality: Roblox Is a Digital Hunting Ground for Child Predators**

8 46. The platform Roblox actually operates bears no resemblance to the one it sells to
9 parents. Behind the blocky avatars and colorful game lobbies is an environment Roblox has
10 allowed to become saturated with sexually explicit content and populated by adults who use its
11 design features to identify, target, and exploit children. This did not happen despite Roblox's
12 choices—it happened because of them. Every design decision that maximized engagement and
13 suppressed safety investment also made Roblox more accessible to predators and more dangerous
14 for the children those predators sought.

15 47. Roblox's design features create a near-perfect environment for child exploitation.
16 Avatars provide anonymity. The absence of age verification allows predators to pose as children.
17 Default settings historically permitted adults to message children of any age without restriction.
18 Third-party "experiences" enabled developers to create environments featuring simulated sexual
19 activity. And the Robux currency system gave predators a powerful tool to manipulate, reward,
20 and coerce children. Roblox's belated age-verification rollout has not solved the problem—it has
21 illustrated how deeply inadequate Roblox's safety investment remains. Roblox's facial age-
22 estimation software, which the company markets as "designed for accuracy," has issues and
23 children have defeated it using avatar photographs, images of adults, or simply drawing wrinkles
24 on their faces.³² Following Roblox's January 2026 global rollout, reporting by Wired documented
25 multiple instances of age-verified accounts belonging to minors as young as nine years old being
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28 ³² Roblox, *A New Era of Safety: Facial Age Checks Now Required to Chat on Roblox*,
<https://about.roblox.com/newsroom/2026/01/roblox-age-checks-required-to-chat> (last visited April 26, 2026).

1 sold on eBay for as little as four dollars.³³ Adults seeking access to children’s content can purchase
2 a compliant account for about the price of a McDonald’s value meal. Roblox’s content-filtering
3 failures are equally ineffective.

4 48. Roblox is aware of multiple workarounds to its supposed restrictions. Roblox
5 nominally restricts users from directing children to outside messaging platforms, but its filters are
6 easily circumvented using widely understood emoji substitutes and phonetic variants of platform
7 names. Phone numbers blocked in digit form pass through freely when written as words. For
8 example, Roblox blocks the word “Discord” but permits the disc emoji and workarounds like
9 “iscord” and “cord.” Roblox technically blocks the words “Snap” and “Snapchat” in chat—but the
10 ghost emoji, widely understood as a symbol for Snapchat, passes through freely, as do variants
11 like “Snappy” and “apchat.” Roblox blocks phone numbers entered as digits, but does nothing to
12 catch phone numbers spelled out as words.³⁴ This is not accidental. It is a choice. Roblox’s human
13 moderation workforce is also grossly insufficient relative to the scale of harm. Roblox employs
14 approximately 3,000 moderators to oversee a platform with 144 million daily active users. TikTok,
15 which has roughly three times Roblox’s user base, employs over 40,000 moderators—more than
16 thirteen times as many.³⁵ Roblox’s own Chief Safety Officer has deflected this disparity by
17 claiming that quality matters more than headcount.³⁶ Based on the explosion of child exploitation
18 cases on Roblox, it seems that Roblox has neither quantity nor quality.

19 49. Roblox further compounds these dangers through its use of persistent “Player
20 Tokens”—individual identifiers tied to each user’s account that do not change as users move
21 between games on the platform. Because these tokens remain constant across the entire Roblox
22 ecosystem, a predator who identifies a child in one game can match that child to her token and
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24 ³³ David Gilbert, Roblox’s AI-Powered Age Verification Is a Complete Mess, *Wired* (Jan. 13, 2026),
<https://www.wired.com/story/roblox-ai-powered-age-verification-is-a-complete-mess/>.

25 ³⁴ Edwin Dorsey, *Problems at Roblox (RBLX) #5*, *The Bear Cave* (Oct. 17, 2024),
<https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>.

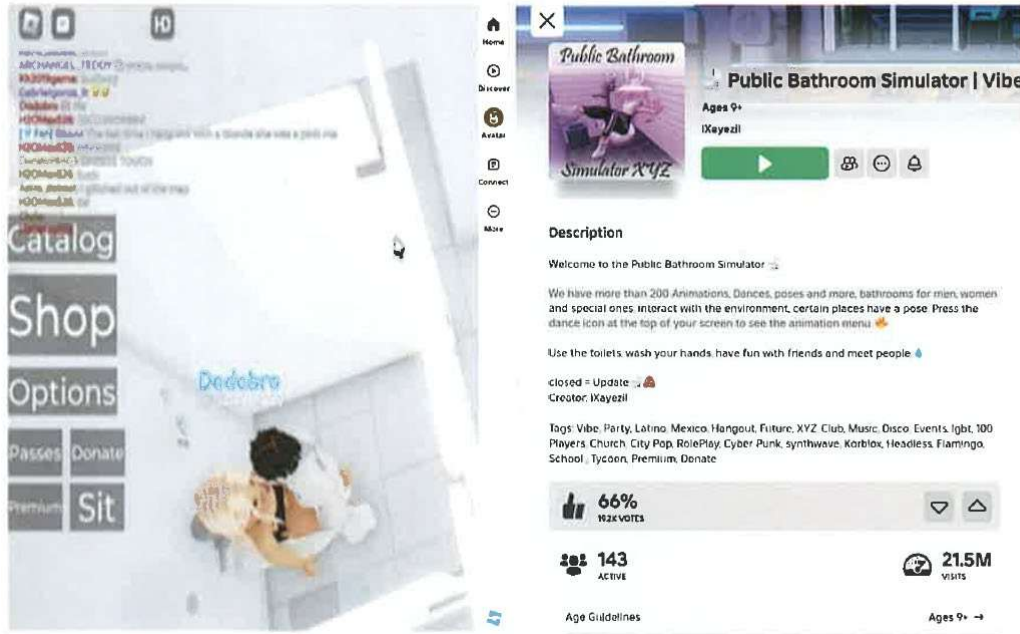
26 ³⁵ Edwin Dorsey, *Problems at Roblox (RBLX) #5*, *The Bear Cave* (Oct. 17, 2024),
<https://thebearcave.substack.com/p/problems-at-roblox-rblx-5>; Olivia Carville & Cecilia D’Anastasio, Roblox’s
27 Pedophile Problem, *Bloomberg Businessweek* (Jul. 23, 2024).

28 ³⁶ 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](https://www.wbur.org/hereandnow/2024/11/18/roblox-safety-features).

1 then follow her from game to game, systematically stalking her across the platform. Roblox has
2 long known that this design feature enables targeted predation of child users and has declined to
3 change it.

4 50. Among the most well-documented categories of sexually exploitative content on
5 Roblox are experiences known as “condo games”—virtual environments, typically styled as
6 residential spaces, in which users strip their avatars of clothing and engage in graphic simulated
7 sexual acts with other users. Roblox has hosted virtual strip clubs, a “Public Bathroom Simulator”
8 game rated for ages nine and up that enables sexual simulations, games modeled after Sean Combs’
9 alleged sex-trafficking parties, and games referencing Jeffrey Epstein’s trafficking island.





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Roblox has permitted over 900 accounts using variations of Epstein’s name to interact openly with children.³⁷ Critically, the game referencing Epstein’s island was designated “All Ages (Suitable to everyone)”—Roblox’s own label—meaning it was accessible to every child on the platform without restriction. Again, this was not an oversight. The vast majority of experiences on Roblox carry the “All Ages” designation, which Roblox permits experience creators to self-assign. Roblox has deliberately declined to audit or enforce age-appropriate designations, because doing so would reduce the number of users per experience and, in turn, reduce revenue.

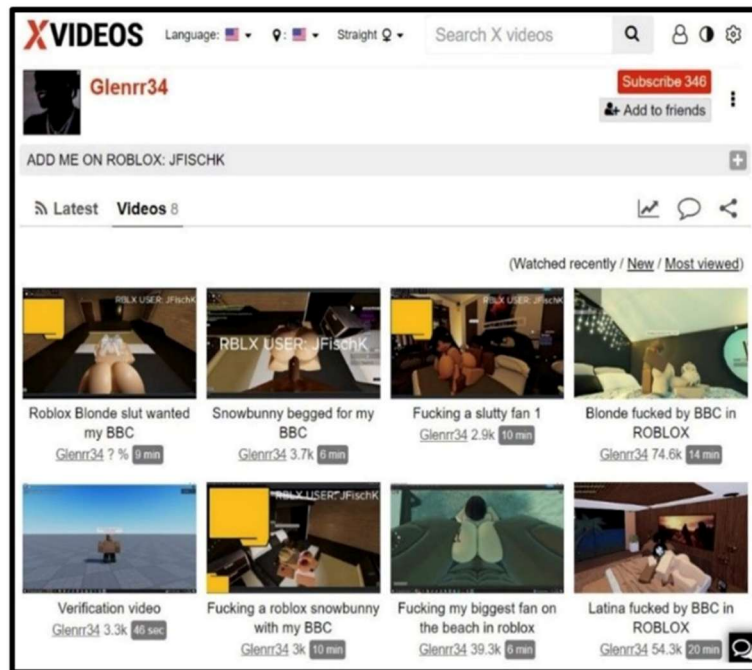
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³⁷ *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, Hindenburg Research (Oct. 8, 2024), <https://hindenburesearch.com/roblox/> (last visited April 26, 2026).

- 1 17+ (Suitable for ages 17 and older)
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- 3 13+ (Suitable for ages 13 and older)
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- 5 9+ (Suitable for ages 9 and older)
- 6
- 7 All Ages (Suitable for everyone)
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10 51. Roblox also knowingly provides the tools for creating and distributing child-
 11 adjacent pornography. The platform supplies users with software designed to produce virtual sex
 12 videos between Roblox avatars. These videos are created using Roblox’s own proprietary file
 13 format—and have proliferated across major pornography websites, where a simple search returns
 14 hundreds of thousands of results.



25 On those same sites, Roblox users openly solicit one another for sexual activity within
 26 games like Brookhaven, one of Roblox’s most popular experiences and one available to users of
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1 all ages.³⁸ Roblox supplies the creation tools, collects transaction revenue, and has allowed this
2 ecosystem to operate unchecked. Roblox’s relationship with the developers who build these
3 experiences is not arm’s-length. From 2015 through 2022, Roblox operated its “Accelerator
4 Program”—a twelve-week, on-site training for intermediate and advanced developers, held at
5 Roblox’s San Mateo headquarters and later conducted remotely, in which Roblox paid participants
6 up to \$13,000 and enrolled between forty and fifty developers per year under the direct supervision
7 of Roblox engineers. The program was specifically designed to build experiences for the Roblox
8 platform. After the Accelerator Program ended, Roblox replaced it with the “Creator Fund,” which
9 provides up to \$500,000 per project to developers creating content for the platform. In 2024,
10 Roblox paid out \$922.82 million through its developer exchange programs; in 2025, \$1.503
11 billion.³⁹ Roblox is not a neutral host of third-party content. It is the financier, trainer, and
12 commercial beneficiary of the developers who build what children encounter on the platform.

13 52. Leaked internal Roblox documents reveal the company was fully aware of this
14 content and made deliberate decisions about how much of it to permit—including discussions
15 about how large an avatar “bulge” was that it deemed acceptable, and whether players could appear
16 nude.⁴⁰ Roblox did not stumble into this; it made choices.

17 53. The predatory pattern on Roblox is systematic and well-documented: an adult
18 predator creates an account, misrepresents their age to appear as a fellow child, befriends a
19 vulnerable minor through gameplay or direct messaging, and then migrates the conversation to
20 another platform—typically Discord or Snapchat—where the predator escalates to soliciting
21 explicit images, engaging in sextortion, and in numerous cases arranging in-person meetings that
22 result in rape and other violent sexual assault.

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25 ³⁸ *Roblox: Inflated Key Metrics for Wall Street and a Pedophile Hellscape for Kids*, Hindenburg Research (Oct. 8,
26 2024), <https://hindenburesearch.com/roblox/> (last visited April 26, 2026).

27 ³⁹ Roblox Corporation, Form 10-K (Feb. 11, 2026), Item 1, Business, at 10 (Annual Developer Exchange Fees),
<http://www.sec.gov/edgar.shtml>.

28 ⁴⁰ Joseph Cox & Emanuel Maiberg, *Leaked Documents Reveal How Roblox Handles Grooming and Mass Shooting
Simulators*, Vice (Aug. 1, 2022), <https://www.vice.com/en/article/leaked-documents-how-roblox-moderates-content-mass-shootings-grooming/>.



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54. Roblox has been aware of this predatory pipeline for years. In 2017, Roblox’s app enabled a predator to target an eight-year-old child and solicit explicit photographs. In 2018, a nine-year-old girl was coerced through Roblox into filming sexually abusive acts on her four-year-old brother. In 2019, a Florida man used Roblox to target children ages 10 to 12, moving them to Discord to coerce nude images. A man in Wales that same year contacted 150 children through Roblox pretending to be a child. In 2020, a 47-year-old predator used Roblox to pose as a teenager, groom a 16-year-old girl, traffic her across state lines, and rape her multiple times.

55. These cases continued through 2021, 2022, 2023, 2024, and into 2025. A 33-year-old man used Roblox to groom a 13-year-old girl in Kansas and transported her to Georgia to rape her. A 64-year-old man admitted to posing as a 13-year-old on Roblox to collect explicit images from a 12-year-old girl and her younger relative. A 24-year-old man raped a 10-year-old girl he had met on Roblox. A New York man was federally charged in 2025 after using Roblox to contact 11 and 13-year-old girls and attempt to arrange sex. These are not anomalies—they are the predictable and foreseeable result of Roblox’s design choices.

56. The severity of what Roblox has allowed on its platform has drawn sustained condemnation from the nation’s leading child safety organizations. The National Center on Sexual Exploitation has placed Roblox on its annual “Dirty Dozen” list—a public accounting of

1 companies whose products most directly facilitate the sexual exploitation of children, and has
2 declared Roblox unacceptably dangerous for children until it implements fundamental protective
3 standards.⁴¹ The data supports this harsh conclusion. Roblox’s own mandatory reports to the
4 National Center for Missing and Exploited Children documented 675 instances of suspected child
5 sexual exploitation in 2019. By 2023, that number had climbed to more than 13,000—a nearly
6 twentyfold increase that Roblox’s alleged safety investments have done nothing to reverse.

7 57. Roblox has also endangered children by introducing communication features it
8 knew it could not safely moderate. In 2021, Roblox released a “Spatial Voice” feature without any
9 guardrail preventing adult predators from speaking to children, and without creating any capability
10 for moderators or its safety team to review those communications. Despite publicly claiming that
11 “[a]ll chat on Roblox is filtered to prevent inappropriate content,” Roblox’s own employees knew
12 that voice communications were entirely beyond the company’s ability to monitor or investigate.
13 Adult predators had free rein to voice chat with child users, and even when those users reported
14 inappropriate conduct, Roblox could not review the offending communications.

15 58. Roblox then compounded the danger. In November 2023—the exact same month
16 that Omegle, a platform notorious for exposing children to sexual predators via anonymous video
17 chat, shut itself down after its founder acknowledged that users had committed “unspeakably
18 heinous crimes” through his platform—Roblox launched Roblox Connect, its own real-time voice
19 call feature.⁴² Roblox game developers immediately flagged the danger. One developer posted
20 publicly to Roblox’s developer forum: “This is literally just asking for a migration of predators
21 and edaters to come to ROBLOX... This is going to turn into a breeding ground for predators. Bad
22 idea.”⁴³ Roblox knew the history. It launched the feature anyway.

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25 ⁴¹ National Center on Sexual Exploitation, *The Dirty Dozen List '24: Roblox, A*
Mainstream Contributor to Sexual Exploitation, <https://endsexualexploitation.org/roblox/> (last updated Dec. 4,
2024).

26 ⁴² Elizabeth Napolitano, *Omegle Shuts Down Online Chat Service Amid Legal Challenges*, CBS News (Nov. 9,
2023), [https://www.cbsnews.com/news/omegle-shut-down-chat-service-legal-challenges-lawsuits/?](https://www.cbsnews.com/news/omegle-shut-down-chat-service-legal-challenges-lawsuits/?ftag=YHFfa5b931b)
27 [ftag=YHFfa5b931b](https://www.cbsnews.com/news/omegle-shut-down-chat-service-legal-challenges-lawsuits/?ftag=YHFfa5b931b).

28 ⁴³ 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/>.

1 59. Despite mounting pressure, Roblox’s recent “safety” changes are woefully
2 inadequate. Roblox banned direct user-to-user messaging for users under 13 outside of games—
3 but adults can still message children within the games themselves, which is precisely where
4 predators have always found their victims. Roblox still relies entirely on self-reported birthdates
5 for age verification at account creation. Roblox still does not require parental consent to create an
6 account. Roblox still does not block IP or MAC addresses of known abusers, allowing banned
7 predators to simply create new accounts under different usernames. In April 2025, a U.K. research
8 firm demonstrated that a 42-year-old account could still find and groom a child on Roblox and
9 move the conversation to Snapchat with no meaningful obstacle. As recently as April 13, 2026—
10 after litigation was filed in several other states—Roblox announced two new age-segmented
11 account tiers: “Roblox Kids” for users ages five to eight, and “Roblox Select” for users ages nine
12 to fifteen, with them planned to be available in June 2026.⁴⁴ The announcement is telling for what
13 it concedes: that Roblox has always had the technical ability to separate child users into protective
14 tiers by age, and it chose not to do so until forced by mounting regulatory and litigation pressure.
15 These are not novel technologies. They are long-overdue acknowledgments of what child safety
16 required from the beginning.

17 60. Critically, Roblox’s failures with American children are not the product of
18 technological limitations. In 2025, regulatory pressure in Australia alone compelled Roblox to
19 configure all accounts for users under 16 to private by default, restrict direct and in-game chat
20 absent age-verification, and allow parents to disable chat entirely—protections Roblox conceded
21 required no new technology. The design defects detailed in Section D below describe exactly what
22 Roblox chose not to deploy for American children, and why.

23 61. The harm from this abuse extends beyond individual victims. Roblox has cultivated
24 an environment in which former victims—children who were exploited on the platform—are
25 statistically more likely to become perpetrators who prey upon younger users.⁴⁵ Researchers have

26 ⁴⁴ Revealing Reality, *A Digital Playground: The Real Guide to Roblox* (Apr. 13, 2025),
27 <https://think.revealingreality.co.uk/roblox-real-guide>.

28 ⁴⁵ James RP Ogloff, et al., *Child Sexual Abuse and Subsequent Offending and Victimization: A 45 Year Follow-Up Study*, Trends & Issues in Crime & Criminal Justice, No. 440 (Jun. 2012),
<https://www.aic.gov.au/sites/default/files/2020-05/tandi440.pdf>; M. Glasser, et al., *Cycle of Child Sex Abuse: Links*

1 repeatedly documented this cycle: children exposed to and victimized by sexual content are more
2 likely to become desensitized and, in some cases, to replicate the exploitation they experienced.
3 Peer-reviewed studies confirm this connection.

4 62. Roblox’s bad faith is perhaps nowhere more clearly demonstrated than in its
5 response to a user who tried to help. Michael Schlep was a Roblox developer who, as a pre-teen,
6 had himself been targeted by a prominent Roblox developer who sent him graphic violent content,
7 pornography, and engaged him in sexually inappropriate conversations—conduct that led Schlep
8 to attempt suicide and require hospitalization. Schlep’s mother notified Roblox. The company did
9 nothing, continuing to platform and contract with Schlep’s abuser for years until another user’s
10 separate complaint finally forced action.

11 63. Schlep subsequently assembled a team to identify active predators on Roblox. His
12 efforts resulted in six arrests across the United States, including convictions for possession of child
13 sexual abuse material. Schlep’s coordination efforts included working with the Arkansas Police to
14 catch Roblox predators exploiting Arkansas children. When Schlep brought detailed predator
15 information to Roblox directly, the company was unresponsive. He began publicly documenting
16 his efforts. Roblox’s response was swift. The company sent Schlep a cease-and-desist letter,
17 banned his accounts, and characterized his predator-identification work as “harmful activit[y]” that
18 was “[s]imilar to actual predators.” The company that refuses to verify user ages, that allows
19 known sex offenders to create accounts freely, and that profits from Robux transactions used to
20 coerce child sexual abuse material moved quickly and decisively to silence the user who was
21 getting predators arrested.

22 **D. Roblox’s Specific Product Design Defects**

23 64. The allegations in this section are directed at Roblox’s own engineering and product
24 decisions, including the architecture Roblox built, the defaults Roblox configured, and the features
25 Roblox chose to include or suppress. None of these claims depend on, arise from, or seek to hold
26 Roblox liable for content that a third-party user posted on its platform. Federal law preserves the

27 _____
28 *Between Being a Victim and Becoming a Perpetrator*, British J. Psychiatry, 179, 6, 482-494 (Dec. 2001),
<https://doi.org/10.1192/bjp.179.6.482>.

1 ability of states to hold technology companies accountable for their own product design choices,
2 and Arkansas exercises that authority here. Roblox did not merely fail to moderate away harm.
3 Roblox engineered a platform whose structural design—across a series of deliberate, documented,
4 and revisable choices—made child exploitation a predictable output of the platform’s normal
5 operation.

6 **The Recommendation and Discovery Algorithm**

7 65. Roblox operates a proprietary algorithmic system that governs what each user sees
8 and experiences when they get onto the platform: which experiences appear in the home feed,
9 which games are surfaced as recommended, which groups are suggested, and which other users
10 are presented as potential contacts. This system is Roblox’s own intellectual property, built by
11 Roblox’s own engineers, and tuned by Roblox’s own product team. It is not neutral. It reflects
12 choices about what to optimize for and what to ignore.

13 66. Roblox engineered its recommendation system around engagement
14 maximization—session length, return frequency, and in-platform spending. Child safety was not
15 a variable in the optimization function. Because predators on Roblox have long understood that
16 their access to child users depends on being present in the most heavily trafficked experiences
17 (those with the largest, youngest, and most engaged audiences), Roblox’s algorithm functioned as
18 an efficient routing mechanism that directed child users toward the precise environments where
19 predatory adults were most concentrated. Roblox’s own moderation data confirmed that the
20 platform’s most popular experiences were also its most exploited. Roblox’s engineers could have
21 incorporated child-safety signals into the recommendation model (that would have shown
22 experiences that don’t have reports of abuse for child-age accounts, or suppressing experiences
23 with elevated adult-on-minor contact patterns. Roblox chose not to incorporate that into its
24 algorithm.

25 67. For accounts registered with child-age birthdays, Roblox’s algorithm governed not
26 only which games appeared in a child’s feed but also which users, groups, and social features
27 appeared as recommendations. Roblox did not design its recommendation system to avoid
28 exposing a nine-year-old to predator-populated social spaces. Instead, Roblox designed its system

1 to maximize engagement by highlighting exposure to popular spaces, regardless of what those
2 spaces are. That engineering choice routed children, by design, into the digital environments where
3 predators were already waiting. It's like fishing in a barrel for predators.

4 **The “Aging Up” Strategy as a Product Design Choice**

5 68. Roblox's decision to pursue what its executives publicly described as an “aging up”
6 strategy was implemented at the product and algorithmic level, not merely as a marketing
7 aspiration. Roblox's engineers modified recommendation weights to suggest adult-targeted
8 experiences with greater frequency; developers were financially incentivized through programs
9 like the Creator Fund to build seventeen-and-older content; and Roblox's CEO declared at the
10 company's 2023 Developer Conference that the platform would build infrastructure for romantic
11 “real-life relationships” between users⁴⁶ while publicly mocking his own safety team's concerns.
12 These were product decisions. The documented consequence was that adult users and adult-
13 targeted content became more accessible to child users who remained on the same integrated
14 platform, because experiences built to attract adults were never age-gated from children. Roblox's
15 CEO confirmed this directly: experiences nominally built for users thirteen and older remained
16 “open to all ages.” The algorithm served adult-targeted content to child accounts because Roblox's
17 engineers did not build any product safeguard to prevent it.

18 **The Search and Discovery Architecture**

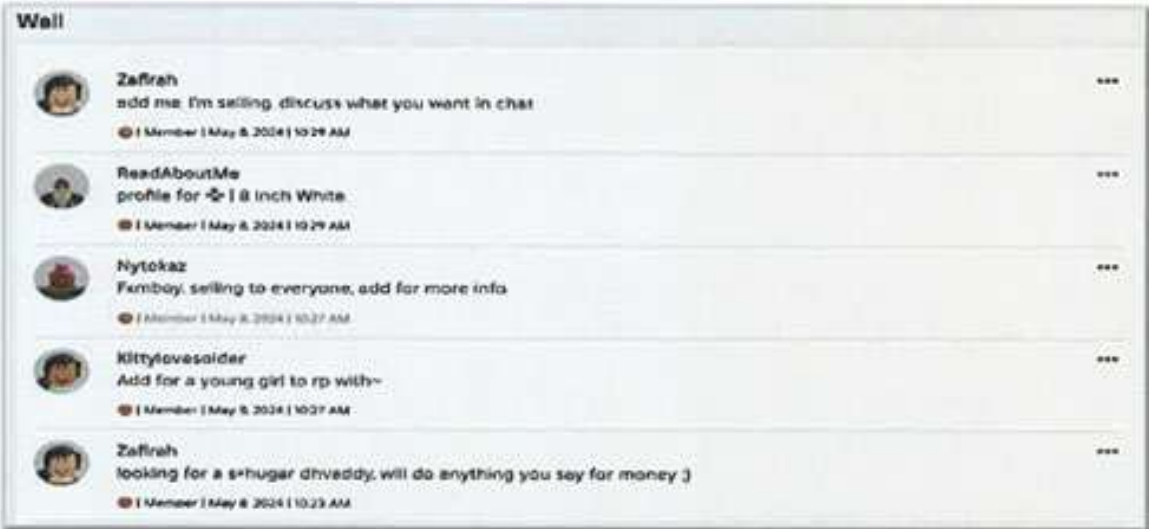
19 69. Roblox's platform includes a search interface through which any user can locate
20 experiences, groups, and other users using open-text keyword queries. Roblox built this system
21 without integrating content-suppression logic adequate to prevent exploitative queries from
22 returning child-accessible results. Predators have used this architecture to locate both child-
23 populated experiences and organized exploitation communities by entering terms associated with
24 the targets they were seeking. Roblox's own moderation data documented the search terms that
25 were being used for predatory purposes. Roblox's engineers could have built query-filtering into
26 the discovery system, that would have suppressed results for searches matching known patterns of
27

28 ⁴⁶ <https://www.livenowfox.com/news/roblox-launch-virtual-dating-feature>

1 predatory activity and preventing the search interface from functioning as roadmap for adults
2 seeking children. Roblox did not build those safeguards into its search architecture.

3 **The Groups Architecture and the Infrastructure of Exploitation**

4 70. Roblox’s Groups feature allows users to create communities of unlimited
5 membership, with public-facing group pages, shared message walls, and internal communication
6 channels. Roblox designed this feature without age-stratified access controls, without verification
7 requirements for group administrators, and without moderation resources scaled to the number and
8 size of groups. Investigative reporting documented groups with memberships in the tens of
9 thousands, including at least one community exceeding 100,000 members that operated openly as
10 organized hubs for soliciting child sexual abuse material and coordinating contact with minors. In
11 fact, Roblox’s Groups infrastructure provided these communities with exactly what they needed
12 to scale: persistent and continuous identity, searchable membership, and shared communication
13 channels. Roblox could have built the feature with age-verification requirements for participation,
14 caps on unmoderated group size, or enhanced requirements for administrators of large public
15 groups. Instead, Roblox built none of those constraints into its architecture.



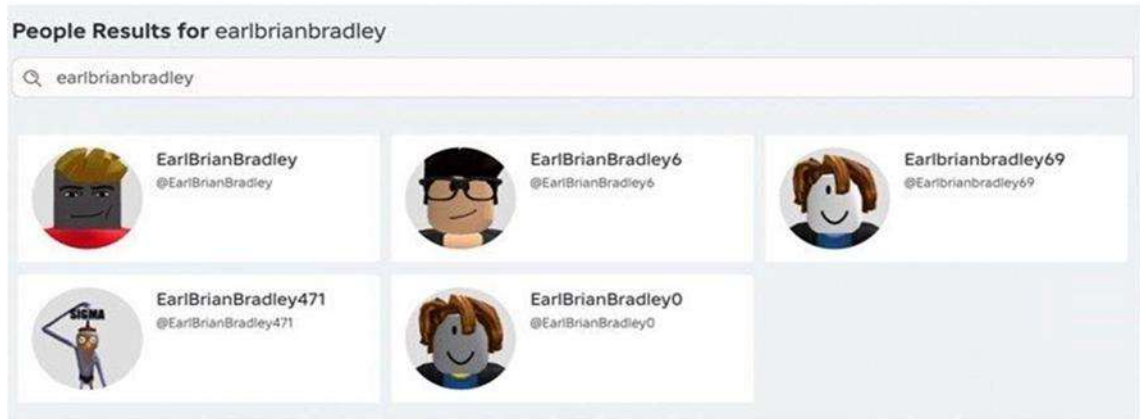
1 **The Robux Currency Architecture as an Instrument of Coercion**

2 71. Roblox earned a transaction fee on every Robux exchange and reported aggregate
3 exchange volume to investors as a measure of platform health. This aggregate measure of the
4 company's financial health was agnostic to whether adult strangers were sending copious amounts
5 of money to kids. Roblox's engineering team designed the Robux currency system as a frictionless
6 transfer mechanism: any account could send Robux to any other account using only a username,
7 with no verification, no parental confirmation, no transfer limit for child-receiving accounts, and
8 no monitoring for exchange patterns consistent with coercion or extortion. Roblox's own
9 transaction records would have documented the pattern of Robux flows from adult accounts to
10 child accounts that preceded or accompanied documented exploitation. Roblox's engineers could
11 have built account-type restrictions into the currency transfer architecture. Roblox could have
12 limited or flagging transfers from unverified adult accounts to accounts registered with child-age
13 birthdays, or requiring secondary confirmation before any transfer to a minor account completed.
14 Roblox built none of those controls into the system. It built a currency architecture optimized for
15 volume, collected fees on every transaction including those that funded child exploitation, and
16 took no architectural steps to separate the financial coercion instrument from the children it
17 targeted.

18 **The Toothless Account Termination Architecture**

19 72. Roblox's efforts to restrict users is effectively meaningless, especially when
20 combined with the lax account verification required to set up new user accounts. Roblox's account
21 termination system was engineered in a way that made bans functionally ineffective. When Roblox
22 terminated an account for predatory conduct, the termination applied only to that account's
23 credentials. It did not restrict the device or network used to access the platform. A predator whose
24 Roblox account was removed could easily return within minutes, on the same device and from the
25 same location, just under a new username and with no technical linkage to the terminated account.
26 Roblox's moderation team was aware of this pattern and loophole. Platform operators across the
27 technology industry have addressed this behavior through device-level and network-level account
28 controls (these are mechanisms that recognize not just the account credential but the underlying

1 infrastructure being used to access the platform). Roblox's engineers chose not to build in those
2 controls. The consequence was a ban system that merely erased usernames but left predators'
3 access to children structurally intact.



11 **The Anonymous Account Architecture**

12 73. Roblox's account registration flow demands only a username, a birthdate, and a
13 password (information any predator can invent in under sixty seconds). A person seeking to access
14 the platform's child users did not need a verifiable identity, did not need confirmed contact
15 information, and did not need a unique identifier that could allow Roblox to flag and connect that
16 a new account was linked to a previously terminated account. For adult-age accounts specifically,
17 Roblox did not build a mechanism to confirm that a given registrant was not already subject to a
18 prior ban, was not a registered sex offender, and had not previously been flagged for predatory
19 conduct. Platforms with far smaller resources than Roblox have implemented account-level
20 uniqueness requirements at registration. Such steps help thwart efforts to easily and continuously
21 recreate accounts after a ban and make bans more meaningful. Roblox's engineering team
22 evaluated options that would have added that friction and declined to implement them, as former
23 employees confirmed, because of the projected impact on user acquisition metrics.

24 **The Deliberate Suppression of In-Platform Warning Systems**

25 74. Within Roblox's product organization, engineers and safety personnel developed
26 proposals to introduce contextual safety messaging into the platform's communication interfaces.
27 These are prompts that would appear when behavioral patterns matched known indicators of
28 grooming or coercion, and that would direct child users toward reporting tools and safety resources

1 at the moment of risk. Those proposals were rejected by Roblox’s product and executive
2 leadership. The reason was not technical infeasibility. As documented through former employee
3 accounts, leadership rejected in-experience warning systems because they would *interrupt* user
4 sessions, reduce the engagement metrics reported to investors, and signal to the market that
5 predatory activity was an ongoing and known feature of the platform. Roblox weighed the
6 operational cost of warning a child at the moment of danger against the business cost of a reduced
7 session-length metric and chose to protect the metric. The children who would have received those
8 warnings did not receive them because Roblox’s leadership decided that investor-facing data
9 mattered more.

10 **The App Store Content Disclosure Architecture**

11 75. Roblox made affirmative product decisions about how to represent its platform to
12 parents at the point of download. In the Apple App Store, Roblox’s product and legal teams
13 submitted self-classification disclosures that resulted in a “12+” age designation with no content
14 flags for sexual content, nudity, or predatory risk—despite years of documented evidence that all
15 three were endemic features of the live platform. In Google Play and the Microsoft Store, Roblox
16 maintained a “T for Teen” classification that similarly excluded the content warnings its platform’s
17 actual environment warranted. These classifications were not errors. They were affirmative
18 product decisions made by people who understood what the platform hosted and chose to describe
19 it differently to the parents whose download decision depended on those disclosures. Every parent
20 who saw a “12+” designation and understood it to mean the platform was appropriate for their
21 twelve-year-old was deceived by a representation Roblox engineered and maintained.

22 **The Absence of a Child-Only Platform Environment**

23 76. Perhaps the most fundamental product design defect in Roblox’s architecture is the
24 one that underlies all the others: Roblox has always operated as a single integrated platform in
25 which users of every age—from five-year-old children to adults of unknown age and history—
26 play in the same environment, access the same experiences, communicate through the same
27 channels, and are surfaced to one another by the same algorithm. The evidence that a structurally
28 different architecture was technically feasible is not theoretical. In 2025, facing regulatory pressure

1 in Australia, Roblox committed to configuring all accounts for users under sixteen to private by
2 default, restricting direct and in-game chat for those users absent age-estimation verification, and
3 granting parents override authority over their child’s communication settings. None of those
4 commitments required capabilities Roblox did not already possess. They required only the decision
5 to deploy those capabilities for child users. Roblox made that decision in Australia because
6 regulatory pressure compelled it. It did not make that decision for Arkansas children (or for
7 American children generally) because it calculated that it did not have to and not doing so meant
8 better metrics and better profits.

9 **The Combined Architecture of Exploitation**

10 77. Each design defect described above represents a product decision Roblox could
11 have made differently at any point across twenty years of operation and chose not to. Reviewed
12 together, they constitute a coherent system: no meaningful age check at the door; a
13 recommendation algorithm that routes child accounts toward adult-populated spaces; a search
14 interface that predators could use as a targeting tool; a currency architecture with no financial
15 coercion controls; a groups feature that provided organizational infrastructure for exploitation at
16 scale; a termination system that removed usernames while leaving predator access structurally
17 intact; no technical barrier to unlimited account replacement; no contextual warnings when
18 grooming patterns emerged in communication channels; materially false disclosures to parents at
19 the point of download; and a single integrated platform that placed children as young as five
20 alongside adults whose ages and histories were entirely unverified. Each of these choices was
21 made by Roblox. None was technologically inevitable. None was reversed until mounting legal,
22 regulatory, and public pressure made inaction untenable. The harm to Arkansas children was not
23 an accident of technology. It was the predictable output of an architecture that was optimized for
24 everything except the safety of the children it was built to attract.

25 **E. Discord’s Origins, Design, and Targeting of Children**

26 78. Discord is a multi-modal communications platform built around persistent group
27 spaces called “servers” and one-on-one private messaging, with voice, video, and text capabilities
28 across all of them. Originally conceived as a tool for video game players to coordinate during

1 gameplay, Discord rebranded itself as a universal social platform around 2020 and has since grown
2 to over 144 million daily active users.⁴⁷ That growth was fueled in substantial part by young
3 people: as the pandemic pushed children’s social lives online, Discord became the preferred
4 communications hub for teenagers and pre-teens across the country. The company has long known
5 this.

6 79. Joining Discord requires nothing more than an email address, a chosen display
7 name, and a self-reported birthdate—none of which Discord confirms or validates. Any person of
8 any age can create a fully functional account in under two minutes. Discord’s Terms of Service
9 nominally prohibit users under 13, but that prohibition is entirely unenforceable by design: Discord
10 has no mechanism to verify that a stated birthdate is accurate, no system to screen out underage
11 users, and no process for confirming parental consent before a child’s account is activated. The
12 result is a platform openly used by children in elementary school, many of whom make their ages
13 apparent in their usernames, bios, and conversations—while Discord does nothing to identify or
14 protect them.

15 80. Discord directly markets its platform to young users. It advertises functionality for
16 school clubs, offers “Student Hubs” for students to connect with classmates, and promotes features
17 designed to “make your group chats more fun.” Discord’s CEO and co-founder has acknowledged
18 that the pandemic drove an influx of young people to Discord: “While adults working from home
19 flocked to Zoom, their children were downloading Discord.”⁴⁸

20 81. Discord generates revenue through its Nitro subscription service and, more
21 recently, through targeted advertising. As Discord has grown—from 56 million monthly active
22 users in 2019 to over 200 million today—private investors have poured billions of dollars into the
23 company, creating intense pressure to prioritize user growth above all else, including child safety.
24 Discord’s CEO has explained the company’s philosophy: “We focus on what our users love, and
25 that drives everything we do.” The financial trajectory illustrates the pressure. Discord’s revenue
26 grew from approximately \$150 million in 2020 to \$600 million in 2024. In January 2026, Discord

27 ⁴⁷ Roblox Corporation Q4 2025 Shareholder Letter (Feb. 5, 2026)

28 ⁴⁸ <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>

1 filed for a U.S. initial public offering—a step that will intensify investor scrutiny of user-growth
2 and engagement metrics and further subordinate child-safety investment to shareholder returns.
3 The same dynamic that drove Roblox to treat safety costs as a drag on earnings is now taking
4 institutional form at Discord.

5 82. Discord has deliberately chosen to allow users to maintain anonymity—permitting
6 fake names, no real-name verification, and no age verification—because requiring real-identity
7 information would drive away users. This design choice creates a haven for predators who rely on
8 anonymity to target children.

9 **F. Discord’s Deceptive Safety Representations**

10 83. Discord has consistently assured parents that its platform is safe for children. It has
11 claimed a “zero-tolerance policy” for anything relating to the sexual exploitation of children and
12 has represented that it builds its products with “safety by design” and defaults to the most
13 protective settings.⁴⁹ Discord’s CEO has testified before Congress that Discord “has a zero-
14 tolerance policy for inappropriate sexual conduct with children.”

15 84. Discord specifically tells parents that its “Teen Safety Assist” feature automatically
16 blurs sensitive media and sends safety alerts to teen users when they receive messages from
17 unfamiliar accounts. Discord assures parents that it has “default settings designed to keep minors
18 safe.”

19 85. These assurances are false. Despite representing that it defaults to safety, Discord
20 for years defaulted not to its most protective message-filtering setting but to an intermediate setting
21 that allowed friends—who could be any adult who friended a child—to send unscreened explicit
22 content. Discord allows Arkansas children to override any parental settings their parents impose,
23 stripping parents of meaningful oversight. Discord’s “Family Center” feature—which purports to
24 help parents monitor their children’s Discord activity—is entirely opt-in, non-mandatory, and
25 prohibits parents from accessing the contents of their children’s messages. Discord’s own product
26 documentation makes the design philosophy explicit. The Family Center tells children directly:

27 _____
28 ⁴⁹ Discord, *Discord Transparency Report: July – September 2022*, <https://discord.com/blog/discord-transparency-report-q3-2022>.

1 “you have control over whether or not you use this feature, how long you want to use it for, and
2 who you connect your account to.”⁵⁰ Discord has placed the child—not the parent—in control of
3 whether any parental monitoring occurs at all. A parent who attempts to monitor her child on
4 Discord can be unilaterally blocked from doing so by the child. Discord frames this as a privacy
5 feature. It is, in practice, a structural protection for predators who rely on parental ignorance to
6 operate.

7 86. Discord’s CEO famously refused to accept service of a congressional subpoena and
8 appeared before the Senate Judiciary Committee only after the U.S. Marshals Service personally
9 delivered the subpoena—a step the Senate described as “a remarkable departure from typical
10 practice.”⁵¹

11 87. Child safety organizations have repeatedly and publicly documented what Discord
12 refuses to acknowledge. For four consecutive years, the National Center on Sexual Exploitation
13 has included Discord on its “Dirty Dozen” list of platforms most complicit in the sexual
14 exploitation of children. The National Center for Missing and Exploited Children has watched
15 Discord-related child sexual abuse material (“CSAM”) submissions multiply year after year. John
16 Shehan, the organization’s Senior Vice President, has publicly described the trajectory as one of
17 “explosive growth” and stated plainly that what Discord hosts is not a perception problem or an
18 edge case: “There is a child exploitation issue on the platform. That’s undeniable.”⁵² Discord has
19 received these warnings. It has chosen not to act.

20 **G. The Reality: Discord Hosts an Epidemic of Child Sexual Exploitation**

21 88. Discord is overflowing with CSAM submissions and sexual exploitation of minors.
22 An NBC News investigation identified 242 publicly listed Discord servers created in a single
23 month that appeared to market sexually explicit content of minors.⁵³ Non-profit researchers
24

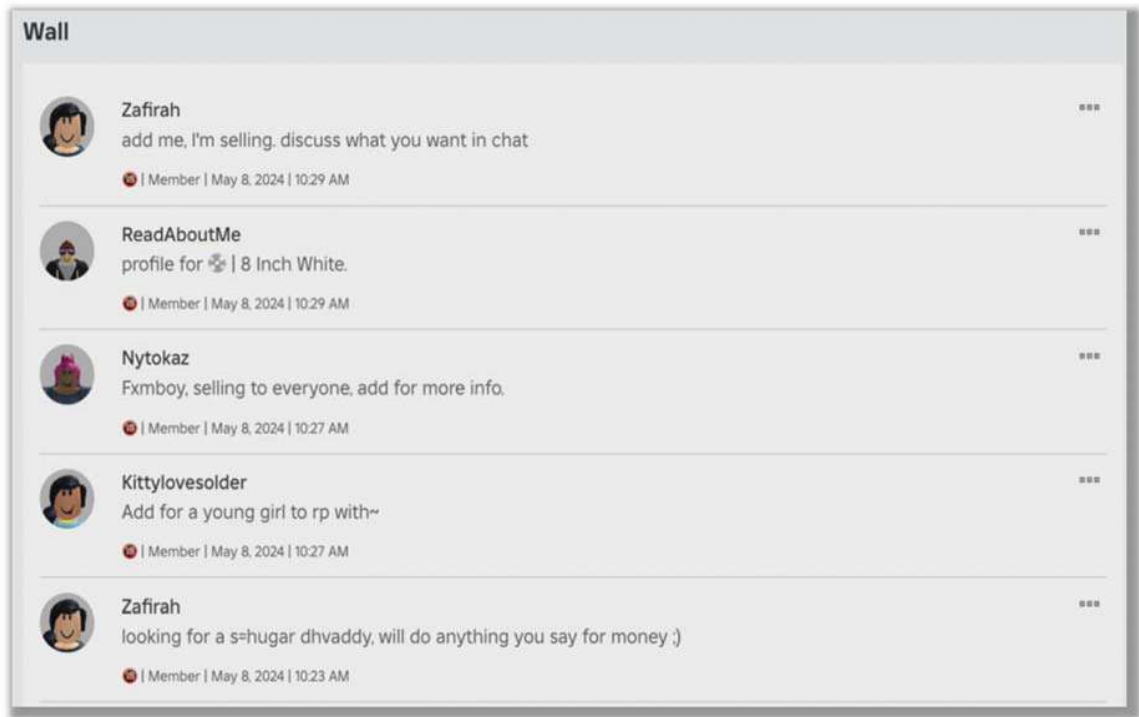
25 _____
26 ⁵⁰ Discord, What Is Family Center?, <https://support.discord.com/hc/en-us/articles/14155039712407>.

27 ⁵¹ Senate Panel Forced to Use U.S. Marshals to Subpoena CEOs of X and Discord, CBS News (Nov. 21, 2023).

28 ⁵² Ben Goggin, *Child Predators Are Using Discord, a Popular App Among Teens, for Sextortion and Abductions*,
NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769>.

⁵³ <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769>

1 documented Discord servers openly soliciting nude images from minors as young as 13, with titles
2 like “a community for people between the ages of 13-17. We trade nudes.”



15 89. Discord has been the communications platform of choice in numerous criminal
16 prosecutions involving child pornography and sexual exploitation. Federal prosecutions have
17 involved men who used Discord to produce, exchange, and distribute CSAM; to solicit explicit
18 images from children aged 8 through 14; to groom children and arrange in-person sexual abuse;
19 and to coerce children into performing sexual acts via video call. Courts have imposed sentences
20 ranging from 6 years to 240 months in federal prison on predators who operated through Discord.

21 90. Discord’s own transparency reports reveal the scale of the problem it has created.
22 In the fourth quarter of 2023, Discord received 416,036 user reports on child safety issues.⁵⁴ By
23 the following quarter, that number had grown to 1,035,166—a 150% increase in a single quarter.⁵⁵

26 ⁵⁴ Discord, *Discord Transparency Report: January – March 2023*, https://cdn.prod.website-files.com/625fe439fb70a9d901e138ab/64b16dade9ba30617e30a40a_Q1%202023%20%7C%20Discord%20Transparency%20Report_%20JANUARY%20-%20MARCH%202023.pdf.

27 ⁵⁵ Discord, *Discord Transparency Report: January – June 2024*, https://cdn.prod.website-files.com/625fe439fb70a9d901e138ab/67056a054d453d30491c1ac9_Discord%20Jan_Jun%202024%20Transparency%20Report.pdf.

1 Discord’s own data confirms that child sexual exploitation on its platform is not declining but
2 accelerating.⁵⁶

3 91. Discord’s safety technology has proven grossly inadequate. The National Center
4 on Sexual Exploitation found that researchers were able to send sexually explicit content from an
5 adult account to an unconnected 13-year-old account with no warning or filtering displayed. One
6 mother reported to CNN that she notified Discord that a man had sent her 10-year-old daughter
7 links to pornography; Discord sent an automated acknowledgment and never responded again.⁵⁷

8 **H. Roblox and Discord Work in Tandem to Facilitate Child Exploitation**

9 92. Roblox and Discord function together as a two-stage predatory pipeline. Roblox
10 serves as the point of initial contact: predators use the platform’s anonymity, avatar-based
11 gameplay, and absent age verification to approach children, pose as peers, and build false
12 emotional connections. Discord serves as the escalation environment: predators migrate children
13 off Roblox to Discord, where they leverage Discord’s unmonitored private messaging, voice calls,
14 and anonymous server structure to solicit explicit material, conduct sextortion, and arrange in-
15 person meetings.

16 93. Roblox and Discord designed their platforms to function seamlessly together.
17 Roblox permits links to Discord servers to be posted within game pages and allows users to include
18 their Discord usernames in their Roblox profiles. Discord enables users to link their Roblox
19 accounts, with “activity status” visible to others showing when a user is playing Roblox and what
20 game they are playing. Discord allows users to send Robux gift card codes to other Discord users.
21 These deliberate design choices facilitate the predatory pipeline. Roblox knew the risks: its own
22 developer communications from as early as 2017 acknowledge that it could not “risk unfairly
23 exposing underage users to platforms such as Discord”⁵⁸—yet Roblox later reversed course and
24 began actively permitting Discord links throughout its platform.

25
26
27 ⁵⁶ Discord Transparency Report: January–March 2023; Discord Transparency Report: January–June 2024.

28 ⁵⁷ Samantha Murphy Kelly, *The Dark Side of Discord for Teens*, CNN Business (Mar. 22, 2022),
<https://www.cnn.com/2022/03/22/tech/discord-teens/index.html>.

⁵⁸ <https://devforum.roblox.com/t/ability-to-link-social-media-platforms-to-groups-including-discord/61815>

1 94. The Roblox-to-Discord predatory pipeline is thoroughly documented. In 2019, a
2 Florida man was arrested for targeting children ages 10 to 12 on Roblox and coercing them on
3 Discord into sending sexually explicit images in exchange for Robux. In 2022, a Florida man was
4 arrested for posing as a teen girl on Roblox to meet a 13-year-old boy and convincing the boy to
5 send sexually explicit images on Discord in exchange for Robux.⁵⁹ In November 2024, the FBI
6 arrested a Michigan man charged with using Roblox and Discord to sexually exploit potentially
7 over 100 children.⁶⁰ In January 2025, a Louisiana man was federally charged for using Roblox and
8 Discord to coerce a teenage girl into sending sexually explicit images.⁶¹

9 95. Roblox and Discord did not merely host the third-party predators who used their
10 platforms; each knowingly profited from the very conduct that exploited Arkansas children.
11 Roblox collected a transaction fee on every exchange of its proprietary currency, Robux—
12 including the documented exchanges in which adult predators transferred Robux to child accounts
13 as bait and as payment for sexually explicit material. Roblox thus derived direct financial benefit
14 from a continuing course of dealing in which it knew, based on its own moderation data and
15 mandatory reports to the National Center for Missing and Exploited Children, that its currency
16 system was being used to obtain child sexual abuse material. Roblox further financed and trained
17 the developers who built the sexualized “experiences” described above—paying Accelerator
18 Program participants up to \$13,000 each and later paying developers through its Creator Fund and
19 developer-exchange programs more than \$922 million in 2024 and more than \$1.5 billion in
20 2025—while taking a fee on the in-experience transactions those developers generated. Discord,
21 in turn, knowingly maintained the anonymous servers and unmonitored direct-message channels
22 through which predators moved children solicited on Roblox, and monetized the resulting
23 engagement through its Nitro subscriptions and advertising. Each Defendant knowingly benefited,

24 ⁵⁹ Max Chesnes, *Deputies Say Vero Beach Man Used Popular Video Game Platforms to Target Children*, TCPalm
25 (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/>.

26 ⁶⁰ Samantha Sayles, *Monroe County Man Uses Roblox, Discord, Snapchat to Sexually Assault Children*,
27 ClickOnDetroit (Nov. 15, 2024), <https://www.clickondetroit.com/news/local/2024/11/15/monroe-county-man-uses-roblox-discord-snapchat-to-sexually-exploit-children/>.

28 ⁶¹ WAFB Staff, *Man Accused of Internet Sex Crimes Allegedly Met Victims on Roblox, Discord*, WAFB (Jan. 31,
2025), <https://www.wafb.com/2025/01/31/man-accused-internet-child-sex-crimes-allegedly-met-victims-roblox-discord/>.

1 financially and by receiving things of value, from its participation in a venture that it knew or
2 should have known was engaged in the sexual exploitation and trafficking of minors. These
3 benefits were not incidental; they were a foreseeable and intended product of design choices each
4 Defendant made and refused to change.

5 96. Arkansas children have not been spared. The predatory behaviors described
6 throughout this Complaint have been used against Arkansas minors, exposing them to
7 psychological trauma, physical danger, and lasting harm. Arkansas law enforcement, schools, and
8 healthcare providers have confronted the consequences of these companies' failures.

9 **I. Defendants' Conduct Has Harmed Arkansas Families and the State**

10 97. As Defendants' platforms have become more deeply embedded in the daily lives of
11 Arkansas children, the State and its institutions have faced growing demands for intervention and
12 support: expanded youth mental health treatment, increased crisis-response needs, strained school-
13 based behavioral health programs, law enforcement resources devoted to investigating online
14 predatory crimes, and statewide efforts to educate families about online exploitation. These costs
15 are now borne by Arkansas taxpayers—not because the harms were unavoidable, but because
16 multi-billion-dollar companies chose to prioritize engagement and revenue over the safety of the
17 children who use their products.

18 98. The harm to Arkansas children is not hypothetical, and it is documented by the
19 State's own law enforcement. The Arkansas State Police Internet Crimes Against Children
20 ("ICAC") Task Force has reported a dramatic escalation in the online exploitation of Arkansas
21 children that tracks the rise of platforms like Roblox and Discord. Preliminary 2025 data show 391
22 sextortion cases investigated by the Task Force—a 118% increase over 2024, and a more than
23 twentyfold increase from the 16 cases investigated in 2020—along with 5,653 reports of online
24 enticement before in-person contact (a 490% increase), 11 suicide threats connected to online
25 exploitation (a 120% increase), and five child sex-trafficking cases (a 150% increase).⁶² Sergeant
26 Corwin Battle, Commander of the Arkansas ICAC Task Force, has publicly identified the surge in

27 _____
28 ⁶² <https://dps.arkansas.gov/news/asp-warns-of-surge-in-online-child-exploitation-as-safer-internet-day-highlights-digital-risks/>

1 sextortion as especially alarming, has confirmed that these crimes remain significantly
2 underreported, and has warned that predators increasingly target rural areas—where they believe
3 there is less law enforcement presence—precisely the demographic of young, rural Arkansas users
4 that Defendants’ platforms reach.

5 99. Arkansas law enforcement has specifically identified Roblox as a platform of
6 concern. In July 2025, in connection with the arrest of four child predators across Saline, Pulaski,
7 Sebastian, and Marion Counties, the Commander of the Arkansas ICAC Task Force publicly
8 warned parents about Roblox as a dangerous platform for children. That same year, the Task Force
9 completed statewide operations targeting online child exploitation that resulted in dozens of
10 arrests, multiple child rescues, and the examination of more than 248 devices containing in excess
11 of thirteen terabytes of data.

12 100. Arkansas families have already turned to the courts over harm traced to Roblox. In
13 December 2025, the family of a Lonoke County boy—who began using Roblox in 2022 at age
14 eleven—filed suit alleging that he was groomed by an adult predator who posed as a peer on
15 Roblox and then moved communications to another platform, where the predator coerced the child
16 into producing and sharing sexually explicit images of himself. The Lonoke County case is one of
17 a growing number of actions by Arkansas families arising from the predatory conduct that
18 Defendants’ design choices enable.

19 **V. CAUSES OF ACTION**

20 **COUNT I**

21 **Arkansas Public Nuisance Law**

22 101. The State incorporates each preceding paragraph as though set forth fully herein.

23 102. The State brings this claim as the State in a *parens patriae* capacity, for the benefit
24 of the people it serves, for the protection of their health, welfare, and prosperity, under Arkansas
25 public nuisance law.

26 103. Defendants have created a mental health and public safety crisis in Arkansas’s
27 communities, injuring the public’s health and safety and interfering with the operations, use, and
28

1 enjoyment of the life and the free use of property of entire communities or neighborhoods. This
2 condition affects a considerable and substantial number of persons within the State.

3 104. Defendants knew, or had reason to know, that use of their platforms and the
4 exploitative and addictive features contained therein would lead to sexual exploitation,
5 psychological harm, and criminal victimization of minors, including but not limited to grooming,
6 sextortion, trafficking, sexual assault, anxiety, depression, and other harms to young users in
7 Arkansas.

8 105. Citizens within the State, including the youth, have a right to be free from conduct
9 that endangers their health and safety. However, Defendants have engaged in conduct that
10 endangers and injures the health and safety of Arkansans by designing, marketing, and operating
11 their platforms and targeting Arkansas youth in a manner that substantially interferes with the
12 functions of the State's operations and impacts the public health, safety, and welfare of the citizens
13 of the State.

14 106. A public nuisance is one that interferes with public health and welfare and creates
15 an imminent risk of public harm. Defendants have created and maintained a public nuisance that
16 proximately caused injury to the State.

17 107. Defendants' conduct was the proximate cause of the public nuisance and the
18 resulting harm to the State. But for Defendants' deliberate design choices—the absence of
19 meaningful age assurance, a recommendation architecture that routes children toward predator-
20 populated spaces, a currency system engineered for frictionless adult-to-child transfers, a
21 termination system that leaves banned predators' access intact, and the suppression of in-platform
22 safety warnings—the widespread exploitation of Arkansas children and the corresponding burdens
23 on the State would not have occurred as they did.

24 108. This claim is directed at Defendants' own conduct in designing, configuring, and
25 operating their platforms—not at any particular item of speech or content created by a third party.
26 The nuisance arises from the dangerous condition Defendants engineered and from features that
27 operate the same way regardless of what any individual user says: the defaults Defendants set, the
28 architecture they built, the safeguards they withheld, and the warnings they suppressed.

1 109. Defendants had control over their conduct in Arkansas, and that conduct had an
2 adverse effect on the public rights detailed herein. Defendants had sufficient control over, and
3 responsibility for, the public nuisance they created—each was in control of the “instrumentality”
4 of the nuisance, namely the operation of their respective platforms, at all relevant times.

5 110. As described herein, Defendants have intentionally and unlawfully engaged in
6 conduct that endangers or injures the health and safety of Arkansas’s residents by designing,
7 marketing, and operating their platforms and targeting Arkansas youth in a manner that
8 substantially interferes with the functions and operations of the State and impacts the public health,
9 safety, and welfare of the public in Arkansas.

10 111. This harm to youth and the corresponding impacts to the public health, safety, and
11 welfare of the State’s communities outweighs any social utility of Defendants’ wrongful conduct.
12 The rights, interests, and inconvenience to Arkansas’s residents far outweigh the rights, interests,
13 and inconvenience to Defendants, each of whom has profited tremendously from its wrongful
14 conduct.

15 112. Defendants know, and have known, that they caused youth to be exploited and
16 harmed through their platforms, harming youth mental health and physical safety.

17 113. Defendants directly facilitated the widespread exploitation and habitual harmful
18 use of their platforms and the public nuisance affecting Arkansas.

19 114. Defendants owed the public a duty to exercise reasonable and ordinary care and
20 skill in accordance with the applicable standards of conduct in designing, marketing, and operating
21 platforms directed to youth and adolescents. Defendants breached that duty.

22 115. Defendants’ conduct is especially injurious to the State because the State and its
23 residents have sustained and will continue to sustain substantial injuries.

24 116. The nuisance created by Defendants’ conduct is abatable. The State has expended
25 substantial resources to mitigate the harm and disruption caused by Defendants’ deceptive and
26 unconscionable practices and will require much more to fully abate the harm.

27 117. The State has incurred expenditures and has had to take steps to mitigate the harm
28 and disruption caused by Defendants’ conduct, including allocating funding for the following:

- 1 a. additional mental health personnel to focus on youth mental health;
- 2 b. additional mental health resources including mental health programs for youth,
- 3 family-based mental health services, crisis prevention programs, outpatient mental
- 4 health programs, mobile crisis programs, emergency services specifically for youth
- 5 mental health emergencies, peer support services, family support services, and
- 6 partial hospitalization programs for youth;
- 7 c. trainings for mental health workers, social workers, school staff, and other
- 8 personnel to help youth, including assessment and diagnosis tools, suicide
- 9 prevention approaches, and trauma-informed care strategies;
- 10 d. production and distribution of educational materials on online safety, exploitation
- 11 prevention, and social-emotional health for youth;
- 12 e. coordination and delivery of mental health care services to public schools within
- 13 the State;
- 14 f. supporting families and caretakers of youth with mental health diagnoses and
- 15 trauma resulting from online exploitation; and
- 16 g. investigating and responding to crimes facilitated by Defendants' platforms,
- 17 including grooming, sextortion, trafficking, and sexual assault of minors.

18 118. The State seeks damages as a result of the public nuisance that Defendants have
19 created, and all other relief available in an action brought by the State in a parens patriae capacity.

20 **COUNT II**

21 **Violation of Arkansas's Deceptive Trade Practices Act**

22 **(§ 4-88-101, et. seq.)**

23 119. The State incorporates each preceding paragraph as though set forth fully herein.

24 120. Pursuant to Ark. Code Ann. § 4-88-104, the Attorney General brings this action for
25 civil enforcement of the provisions of the ADTPA seeking restitution and an injunction against
26 Defendants to cease the deceptive trade practices in which they have engaged.

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1 121. Defendants knowingly and actively designed their products to attract and retain
2 minor users without implementing adequate safeguards, regardless of the harm that their platforms
3 caused to those users.

4 122. Despite having internal knowledge, employee warnings, law enforcement
5 notifications, and media reporting detailing the predatory use of their platforms, Defendants led
6 users and parents of young users to believe their platforms were safe for use by young people.

7 123. Defendants made these representations despite their own data, research, and
8 internal information showing that their platforms were being actively used by predators to exploit
9 Arkansas youth.

10 124. Despite knowledge of the risks posed by use of their products, Defendants targeted
11 young users most vulnerable and likely to be affected by the harmful aspects of their products
12 because of the potential profit to be gained by capturing more of the child, tween, and teen markets.

13 125. Defendants did not adequately inform users, potential users, and parents of users of
14 the data and risks known to Defendants about the dangers posed by use of their products.
15 Defendants actively concealed, omitted, and suppressed these material facts with the intent that
16 users rely upon that concealment, omission, and suppression to continue to add users in callous
17 and reckless disregard for the known physical and mental health harms being created. Defendants
18 further misled and deceived the public about the destructive and harmful effects their products
19 have had and continue to have on youth users.

20 126. The specific false representations as to the characteristics of Defendants' products
21 are separately alleged in Count III below.

22 127. Through Defendants' unconscionable and deceptive trade practices of deceiving
23 users and potential users about the truth of the safety of their services, Defendants knowingly took
24 advantage of vulnerable children and adolescent users who were reasonably unable to protect their
25 own interests because of their young age. Children and adolescent users and their parents are
26 ignorant of the facts Defendants have in their possession and control, and they are unable to
27 understand the harmful and exploitative consequences of using Defendants' products, which
28 conduct constitutes a violation of Ark. Code Ann. § 4-88-107(a)(8).

1 128. Defendants used deception, false pretense, and the concealment, suppression, and
2 omission of material facts regarding the safety of their products with intent that others rely upon
3 the concealment, suppression, or omission of those material facts in order to increase the sale of
4 advertisements and subscriptions on their products in violation of Ark. Code Ann. § 4-88-
5 108(a)(1)-(2).

6 129. Defendants concealed, omitted, and suppressed material facts with the intent that
7 others rely upon the concealment, omission, and suppression in order to maintain users, gain
8 additional users, and increase users' screen time and frequency of engagement with their products
9 to facilitate the sale and delivery of targeted advertising and subscription revenue in violation of
10 Ark. Code Ann. § 4-88-108(a)(2).

11 130. Defendants undertook deceptive and unconscionable practices in furtherance of
12 their business, commerce, or trade and to profit at the cost of the safety and well-being of youth
13 users in violation of Ark. Code Ann. § 4-88-107(a)(10).

14 131. The false representations, fraud, concealments, omissions, and suppressions of
15 damaging information were deceptive and constituted a repeated course of unconscionable conduct
16 contrary to public policy and the public's interest that continues to this day.

17 132. The harmful and exploitative qualities of Defendants' products and the design
18 features used to foster and enable that exploitation are not fully known or appreciated by minor
19 users or their parents.

20 133. Pursuant to Ark. Code Ann. § 4-88-113, the State seeks a declaratory judgment that
21 Defendants violated the ADTPA, an injunction enjoining Defendants' false representations,
22 omissions, concealments, and suppressions described throughout this Complaint, civil penalties of
23 \$10,000 per violation, costs, attorneys' fees, and all other relief available under the ADTPA in an
24 action brought by the State in a parens patriae capacity.

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1 **COUNT III**

2 **Violation of Arkansas’s Deceptive Trade Practices Act —**

3 **False Representations as to Product Characteristics**

4 **Ark. Code Ann. § 4-88-107(a)(1)**

5 134. The State incorporates each preceding paragraph as though set forth fully herein.

6 135. The Arkansas Deceptive Trade Practices Act prohibits any person from knowingly
7 making a false representation as to the characteristics, uses, or benefits of goods or services. Ark.
8 Code Ann. § 4-88-107(a)(1). Roblox and Discord are each a “person” within the meaning of the
9 ADTPA, Ark. Code Ann. § 4-88-102(6), and each engaged in acts and practices in connection with
10 the sale and distribution of goods and services as defined by Ark. Code Ann. § 4-88-102(7).

11 136. The characteristics of Roblox and Discord as products—specifically, the safety
12 characteristics of each platform for use by children—were and remain material to the decision of
13 parents and guardians to permit their children to use those products. Defendants knew that parents
14 would not permit their children to use platforms that endangered them. Defendants knew,
15 therefore, that accurate representations about the safety characteristics of their platforms were
16 essential to their ability to acquire and retain child users at scale. Rather than make accurate
17 representations, each Defendant made a sustained, knowing campaign of false ones.

18 **Roblox’s False Representations as to Product Characteristics**

19 137. Roblox knowingly represented that its platform had safety characteristics it did not
20 have, in violation of Ark. Code Ann. § 4-88-107(a)(1). Those representations include, but are not
21 limited to, the following:

22 a. Roblox represented that its platform was an “online virtual playground . . .
23 where kids of all ages can safely interact, create, have fun, and learn”—a representation
24 Roblox made on its website beginning in 2007 and repeated for years thereafter, when
25 Roblox knew its platform was accessible to adults who could and did target, groom, and
26 sexually exploit children without meaningful restriction.

27 b. Roblox represented that it “take[s] every precaution possible to make sure
28 kids are protected from inappropriate and offensive individuals as well as from indecent

1 and distasteful content”—a representation Roblox made publicly from 2008 through 2016
2 and beyond, when Roblox had made the deliberate engineering decision to implement no
3 age verification, no biometric screening, and no device-level barriers that would have given
4 that assurance any substance.

5 c. Roblox represented that it is “a safe, moderated place to meet, play, chat,
6 and collaborate on creative projects” when, in fact, Roblox’s moderation workforce was a
7 fraction of the size required to review the volume of content on the platform, chat filters
8 were trivially bypassed using alphanumeric substitutions and emoji, and adult predators
9 could freely communicate with child users.

10 d. Roblox represented that it “take[s] kids’ safety and privacy very seriously”
11 and that it “strive[s] to continually develop new and innovative technologies that will
12 protect the safety of our community while allowing players to imagine, create, and play
13 together in a family-friendly environment” when, at the same time, Roblox’s executive
14 team was rejecting employee proposals to implement age verification, in-experience safety
15 warnings, and device-level account controls on the explicit ground that those measures
16 would reduce engagement metrics.

17 e. Roblox represented that “safety is in our DNA,” that it employs an “expertly
18 trained team with thousands of members dedicated to protecting our users and monitoring
19 24/7 for inappropriate content,” and that it conducts a “safety review of every uploaded
20 image, audio, and video file”—representations Roblox made publicly while employing
21 approximately 3,000 moderators for a platform with 144 million daily active users and
22 while knowingly hosting over 600 games trivializing sexual violence and at least one group
23 of over 100,000 members openly engaged in soliciting child sexual abuse material.⁶³

24 f. Roblox represented that it “goes above and beyond to foster an environment
25 where people of any age can create, play, learn, and imagine safely” and that it had “kept
26 children’s privacy and safety top-of-mind when designing our platform”—representations
27

28 ⁶³ Roblox, *Safety & Civility at Roblox*, <https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox> (last visited April 27, 2026).

1 that were directly contradicted by Roblox’s internal decision, documented by former
2 employees, to prioritize growth and engagement metrics over any safety investment that
3 would reduce those metrics.

4 g. Roblox represented that “[a]ny sort of bad actor that comes onto the
5 platform is dealt with swiftly” and that “[w]e remove any content that’s reported to us
6 within minutes”—representations Roblox made through its Vice President of Civility and
7 Partnerships while Roblox’s own termination architecture allowed banned predators to
8 create replacement accounts on the same device within minutes of removal.

9 h. Roblox represented that “Roblox was designed for kids and teens, and we
10 have a responsibility to make sure our players can learn, create, and play safely. This
11 continues to be our most important priority and that will never change”—a representation
12 Roblox made while simultaneously pursuing an “aging up” strategy that intentionally
13 introduced adult users and adult-targeted content into the same integrated environment as
14 the children Roblox claimed to prioritize.

15 i. Roblox represented that “any time anything happens to a child that puts
16 them at risk is one too many” when Roblox’s own CFO was simultaneously assuring
17 investors that trust and safety costs would “scale below linear” as the company grew, and
18 Roblox’s CEO was publicly characterizing the problem of child predation on the platform
19 as “an opportunity.”

20 j. Roblox represented to parents through app store disclosures that its platform
21 was appropriate for users as young as twelve—obtaining a “12+” designation in the Apple
22 App Store and a “T for Teen” rating in Google Play and the Microsoft Store—without
23 disclosing the presence of sexual content, predatory adult access, or child exploitation that
24 Roblox’s own moderation data confirmed were endemic features of the platform.

25 138. Each of the representations identified above was false when made. Each was made
26 knowingly. Each was made in connection with the marketing, distribution, and sale of Roblox to
27 Arkansas consumers, including to parents of Arkansas children who relied on those representations
28 in deciding whether to permit their children to use Roblox.

1 **Discord’s False Representations as to Product Characteristics**

2 139. Discord knowingly represented that its platform had safety characteristics it did not
3 have, in violation of Ark. Code Ann. § 4-88-107(a)(1). Those representations include, but are not
4 limited to, the following:

5 a. Discord represented that it “began as a way for us to all play games together,
6 better. And Safer” and that it has “always wanted Discord to be a place where one could
7 safely play games with friends”—representations Discord has made since its founding
8 while building and maintaining a platform with no age verification, anonymous server
9 architecture, and default settings that allowed strangers to message children directly.

10 b. Discord represented that it has a “zero-tolerance policy” for anything
11 relating to the sexual exploitation of children—a representation Discord’s CEO made
12 publicly, in press releases, and in sworn Senate testimony—when Discord’s own
13 transparency reports document that child safety violations on the platform increased by
14 150% in a single quarter and Discord’s moderation response to those reports was
15 documented as slow, automated, and in many cases entirely non-responsive.

16 c. Discord represented that “[s]afety is at the core of everything we do and a
17 primary area of investment as a business” when Discord was simultaneously declining to
18 implement age verification, allowing children to override any parental controls parents
19 imposed, and choosing to allow users to communicate using fake names and unverified
20 identities specifically because requiring real-identity information would reduce user
21 growth.

22 d. Discord represented that it “built Discord to be different and work
23 relentlessly to make it a fun and safe space for teens” when Discord had designed its
24 platform to default not to its most protective direct-message filtering setting but to an
25 intermediate setting that allowed any “friend”—who could be any adult who had sent a
26 child a friend request—to transmit unscreened content directly to that child.

27 e. Discord represented that it makes “products safe spaces by design and
28 default” and that “safety is and will remain part of Discord’s core experience” when

1 Discord’s own product documentation placed children in control of whether any parental
2 monitoring occurred at all, and Discord’s “Family Center” feature explicitly told children
3 that they could revoke parental access at any time.⁶⁴

4 f. Discord represented that it has “default settings designed to keep minors
5 safe, such as automatically scanning direct messages for explicit images and videos” when
6 in fact Discord’s default setting was not the most restrictive scanning option but an
7 intermediate setting that excluded images sent by accounts classified as “friends,” and
8 when Discord’s own Teen Safety Assist feature was found by the National Center on
9 Sexual Exploitation to fail entirely, allowing sexually explicit content to reach a 13-year-
10 old test account with no warning or filtering displayed.

11 g. Discord’s CEO represented to the United States Senate in sworn testimony
12 that Discord takes a “safety by design” approach and has a “multi-pronged approach” to
13 child safety, including “sophisticated tools” and “features designed to keep teens safe”—
14 representations made while Discord was simultaneously refusing to implement age
15 verification at account creation, allowing children to opt out of parental monitoring, and
16 declining to require real-name registration despite knowing that platform anonymity was
17 the primary feature enabling predatory conduct.

18 140. Each of the representations identified above was false when made. Each was made
19 knowingly. Each was made in connection with the marketing, distribution, and delivery of Discord
20 to Arkansas consumers, including to parents of Arkansas children who relied on those
21 representations in deciding whether to permit their children to use Discord.

22 **Relief For Violations Of Arkansas Deceptive Trade Practices Act**

23 141. Defendants’ violations of Ark. Code Ann. § 4-88-107(a)(1) were committed
24 knowingly. Pursuant to Ark. Code Ann. § 4-88-113, each knowing violation constitutes a separate
25 violation subject to a civil penalty of \$10,000. Given the years-long duration of Defendants’ false
26 representations, the number of Arkansas consumers who were exposed to and relied upon those

27 ⁶⁴ Discord, *D_i_s_c_o_r_d'_s_C_o_m_m_i_t_m_e_n_t_t_o_a_S_a_f_e_a_n_d_T_r_u_s_t_e_d*
28 *E_x_p_e_r_i_e_n_c_e* (May 12, 2022), <https://discord.com/safety/360043700632-discords-commitment-to-a-safe-and-trusted-experience>; <https://discord.com/safety/commitment-to-teen-child-safety>.

1 representations, and the deliberate nature of Defendants’ misrepresentations about the safety
2 characteristics of their products, the State seeks civil penalties at the statutory maximum for each
3 violation, together with injunctive relief, attorneys’ fees, costs, and all other relief available under
4 the ADTPA.

5 **COUNT IV**

6 **Unjust Enrichment**

7 142. The State incorporates each preceding paragraph as though set forth fully herein.

8 143. Under Arkansas law, unjust enrichment occurs when a party has received
9 something of value to which he or she is not entitled by some operative act, intent, or situation to
10 make the enrichment unjust and compensable.

11 144. Unjust enrichment can be found when a person has received money or its equivalent
12 under such circumstances that in equity and good conscience he or she ought not to retain.

13 145. Unjust enrichment requires that a conscious wrongdoer—one who is aware that its
14 conduct violates the rights of another—may be required to disgorge the net profits attributable to
15 its misconduct, and that remedy is available regardless of whether the plaintiff paid money to, or
16 suffered a measurable financial loss at the hands of, the wrongdoer. Restatement (Third) of
17 Restitution and Unjust Enrichment § 51. The measure of recovery is not what the plaintiff lost but
18 what the defendant wrongfully gained.

19 146. Each Defendant is a conscious wrongdoer. As alleged throughout this Complaint,
20 each knew that its platform was being used to exploit children, knew that its design choices enabled
21 that exploitation, and continued to profit from the resulting engagement and transactions while
22 concealing the danger from Arkansas parents.

23 147. Each Defendant received a benefit at the expense of Arkansas citizens in the form
24 of advertising revenue, subscription revenue, and virtual currency transaction revenue derived
25 from time spent on their respective platforms.

26 148. Defendants designed their platforms to maximize engagement and time-on-
27 platform for minor users, thereby monetizing the screen time and data of Arkansas’s children and
28

1 causing harm. Accordingly, the citizens of Arkansas conferred a financial benefit on Defendants
2 but did not receive the expected benefit therefrom.

3 149. The false representations, concealment, omission, and suppression of facts detailed
4 throughout this Complaint were used to generate advertising, subscription, and transaction revenue
5 at the expense of unwary and vulnerable users who were not informed of the harms and dangers
6 associated with the use of Defendants' products and features.

7 150. Through the use of the deceptive, unlawful, and unconscionable practices detailed
8 throughout this Complaint, Defendants readily accepted and retained these benefits at the expense
9 of the citizens of Arkansas and knowingly benefitted from their unjust conduct.

10 151. It is unjust and inequitable for Defendants to retain these benefits because they were
11 attained by falsely representing, suppressing, and concealing the true nature of their platforms from
12 the State's citizens, who would not have permitted their children to spend time on Defendants'
13 platforms but for Defendants' deception, false representations, manipulations, and concealment.

14 152. Equity cannot in good conscience permit Defendants to retain the benefits derived
15 from the State and at the expense of the health and safety of Arkansas citizens through their unjust
16 and unlawful acts, and therefore restitution or disgorgement of the amount of each Defendant's
17 unjust enrichment is required.

18 153. There is no valid, legal, and binding contract governing this dispute.

19 154. The State, therefore, seeks restitution and disgorgement of the sum, to be
20 determined at trial, by which each Defendant has been unjustly enriched.

21 **JURY DEMAND**

22 The State demands a trial by jury.

23 **PRAYER FOR RELIEF**

24 WHEREFORE, the State prays for judgment as follows:

- 25 A. Declaring that the conduct alleged herein constitutes a public nuisance under
26 Arkansas law;
- 27 B. Requiring Defendants to abate the public nuisance described herein and to deter
28 and prevent the resumption of such nuisance;

- 1 C. Enjoining Defendants and any agents, successors, assigns, and employees acting
2 directly or through any corporate or business device from engaging in further
3 actions causing or contributing to the public nuisance as described herein;
- 4 D. Declaring that Defendants violated the ADTPA;
- 5 E. Enjoining Defendants and any agents, successors, assigns, and employees acting
6 directly or through any corporate or business device from engaging in acts and
7 practices alleged in this Complaint and any other acts and practices that violate the
8 ADTPA;
- 9 F. Directing Defendants to disgorge and forfeit all profits derived as a result of their
10 unfair and deceptive acts and practices;
- 11 G. Awarding equitable relief to fund prevention education and treatment for online
12 exploitation and problematic use of social media and gaming platforms;
- 13 H. Awarding actual and compensatory damages;
- 14 I. Awarding the maximum statutory damages;
- 15 J. Awarding reasonable attorneys' fees and costs;
- 16 K. Awarding pre-judgment and post-judgment interest; and
- 17 L. Granting further just and proper relief.

18
19 DATED: June 10, 2026

Respectfully submitted,

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