TESTIMONY OF KHARI JAMES
BEFORE THE UNITED STATES SENATE JUDICIARY
SUBCOMMITTEE ON CRIME AND COUNTERTERRORISM:

Roblox and Online Gaming: Digital Playgrounds Endangering America's Children

Opening Statement:

Chairman Hawley, Ranking Member Durbin, and Members of the Subcommittee:

Thank you for the opportunity to testify today.

My name is Khari James, Senior Legal Counsel at the National Center on Sexual Exploitation ("NCOSE") – a national non-profit dedicated to eradicating all forms of sexual exploitation by exposing the links between them.

I am here today because children are being sexually exploited on a platform marketed directly to them, that is designed to be addictive, and that connects them with adults they otherwise would never have met.

That platform is Roblox.

Roblox is not simply a video game. It is a billion-dollar virtual world made up of millions of individual games, where children can communicate, and interact with adult strangers.[1]

And this virtual world is enormous. Roblox reports 123 million daily active users,[2] nearly 73 percent of whom are under age 18.[3]

Roblox has been used by adult predators to groom children, solicit and exchange child sexual abuse material ("CSAM"), and lure children into meeting them in person – leading to kidnapping, sexual abuse, and murder.

Many of these child victims are between the ages of 10 and 15.

The most troubling part is that, based on NCOSE's research, these harms occur as a direct result of Roblox's design.

[1] Metrics for Brands & Developers on Roblox, Roblox, https://brands.roblox.com/metrics-insights (last visited Nov. 1, 2026).
[2] Roblox Corp., *Shareholder Letter Q2 2026* 8 (July 30, 2026).
[3] Bryan, *Roblox Live Player Count and Statistics* 2026, Icon Era (July 27, 2026), https://icon-era.com/statistics/roblox-player-count/.

This is why, in May 2026, NCOSE partnered with Fairplay to file an FTC complaint on Roblox's inherently deceptive design, practices that incentivize prolonged engagement, and the resulting consequences for child safety and sexual exploitation.[4]

Roblox has since implemented some age-verification and communication safeguards.[5] However, these changes do not undo harms of the past and still fall short.

NCOSE's adult researchers can still create accounts pretending to be five-year-olds without parental consent or age verification. We accessed experiences involving dating, romance, and violence. And we freely interacted with strangers, adding them as friends and joining private chats with them.[6]

Another issue is that Roblox encourages users to become "developers" who create games, avatars, and items for sale on the platform. This generates revenue for Roblox. But developers can also create their own chat features, which are not subject to Roblox's new safety settings.

This is a critical loophole.[7]

Roblox cannot claim to protect children through age verification while allowing developers to build features that bypass those very protections.

Roblox also added parental monitoring but decreases it significantly as children age. By age 13, parental control is progressively reduced, with parents retaining only limited oversight of their child's accounts.[8]

Even with parental controls, the responsibility to protect children must begin with the platform.

A safety system that requires parents to be cybersecurity experts does not adequately protect children.

Parents cannot use safeguards that are confusing or buried in settings. And parental controls cannot be a substitute for platform responsibility.

Roblox needs to stop making child safety so complicated. Its safety standards should be clear, transparent, and designed to prioritize children's safety over user engagement. For example,

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[4] Fairplay & Nat'l Ctr. on Sexual Exploitation, *Request for Investigation of Roblox Corp.* (May 20, 2026), https://fairplayforkids.org/wp-content/uploads/2026/05/Fairplay-and-NCOSE_Request-for-FTC-Investigation-of-Roblox_05.20.26.pdf. (Attached as Exhibit A)

[5] Matt Kaufman & Elizabeth Milovidov, *What Families Need to Know About Roblox's New Age-Based Protections*, Roblox (May 20, 2026), https://about.roblox.com/newsroom/2026/05/what-families-should-know-roblox-kids-select; Matt Kaufman & Rajiv Bhatia, *Moving Beyond Self-Reported Age*, Roblox (Feb. 5, 2026), https://about.roblox.com/newsroom/2026/02/moving-beyond-self-reported-age.

[6] *Request for Investigation of Roblox Corp.,* supra note 7, at 49.

[7] *Parental Controls Overview*, Roblox Support, https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview (last visited Nov. 2, 2026).

[8] *What Happens as My Child or Teen Gets Older on Roblox?*, Roblox, https://en.help.roblox.com/hc/en-us/articles/30428367965460-What-happens-as-my-child-or-teen-gets-older-on-Roblox (last visited Nov. 1, 2026).

Roblox can eliminate chat for minors and reserve that feature for adults who have verified their age.

Child online safety cannot be treated as an optional feature added *after* harm occurs.

This is why regulation is necessary.

Roblox implemented safety measures *after* extensive harm and intense scrutiny. But these voluntary safety measures can be changed, weakened, or removed by Roblox at any time.

Roblox may be a virtual world. But the children are real. The predators are real. The addiction is real. The exploitation is real. And the consequences are real.

Children should never have to enter a game, marketed to them, and wonder whether the person on the other side of the screen is there to play with them—or prey on them.

We urge this Subcommittee to insist upon safety regulations that put the protection of children ahead of engagement and profit.

Thank you.

Senate Judiciary Subcommittee: Roblox and Online Gaming: Digital Playgrounds Endangering America's Children
Written Testimony Submitted by:
Khari James, Senior Legal Counsel, National Center on Sexual Exploitation
November 17, 2026

I. Introduction

Chairman Hawley, Ranking Member Durbin, and Members of the Subcommittee:

Thank you for holding this hearing and for the opportunity to testify on an issue critical to protecting children online.

My name is Khari James, and I serve as Senior Legal Counsel at the National Center on Sexual Exploitation ("NCOSE"), a national nonprofit organization dedicated to eradicating all forms of sexual abuse and exploitation by exposing the connections between them.

NCOSE works across several areas to hold accountable those who enable, facilitate, or profit from sexual exploitation. Our work includes legal advocacy through litigation against entities that facilitate or enable exploitation; policy advocacy to strengthen laws and regulations protecting children; and corporate advocacy urging companies to take meaningful action to prevent sexual exploitation through their platforms and services.

My testimony will focus on Roblox and how its design choices have prioritized user engagement and profit while creating an environment in which adults can access, groom, and exploit children. I will examine how Roblox's design encourages prolonged, potentially addictive engagement among children; how significant deficiencies in its safety measures have persisted despite foreseeable risks to child users; and how the company's response to mounting scrutiny has relied on voluntary safeguards that remain insufficient to protect children. Ultimately, children's safety should not depend on whether a company is facing public scrutiny or congressional attention.

II. Roblox and their business model

Roblox is one of the most popular social gaming platforms in the world. The company describes Roblox as an "immersive gaming platform where users can come to discover online games and play together," which also functions as a game creation studio and engine for developers and artists.[9] However, in reality, Roblox is far more than a video game. It is an expansive social and commercial platform consisting of millions of user-created games and experiences where children and adults can communicate, interact, and spend virtual currency on in-game purchases.[10]

Creating an account on Roblox is alarmingly easy. Anyone can access the platform through a computer, phone, tablet, or gaming console.[11] To create an account, users can be as young as 5-

[9] *What Is Roblox?*, Roblox, https://about.roblox.com/what-is-roblox (last visited Nov. 1, 2026).
[10] *Safety at Roblox*, Roblox, https://about.roblox.com/safety#roblox-kids-and-select-account (last visited Sept. 15, 2026).
[11] *Request for Investigation of Roblox Corp.*, *supra* note 4, at 4.

years old.[12] There is no age verification, parental notification, or parental consent requirements needed. A user simply needs to enter a birthdate, username, and password; providing a gender is optional. In fact, NCOSE researchers, all over the age of 30, were able to create accounts posing as five-year-old children with ease.

Roblox also allows users to create their own games and experiences, becoming what the company calls "creators" or "developers." These creators participate in a revenue-sharing model that financially rewards them for generating content and monetizing user engagement.[13] Yet, as discussed later in this testimony, important safety protections implemented by Roblox do not extend to all communication features within these creator-developed experiences.[14]

Roblox has made clear that its business depends heavily on incentivizing creators to generate engaging and profitable content. In its 2026 Proxy Statement and 2025 Annual Report, which are combined into one document, the company acknowledged: "we depend on our creators to create digital content that our users find compelling, and if we fail to properly incentivize our creators to develop and monetize content, our business will suffer."[15]

Roblox provides creators with opportunities to earn Robux, its virtual currency, through the creation of experiences and virtual items.[16] When users purchase virtual items, the creators receive a portion of the Robux spent.[17] Those Robux are paid out to the creator in fiat currency. Creators can also offer paid access to their experiences in exchange for a higher revenue share of those purchases.[18] Those earnings can ultimately be converted into real-world currency through Roblox's developer exchange program.[19] Importantly, Roblox permits children as young as five to participate in its creator ecosystem and content creation.[20]

Since its public release in 2006, Roblox's user base has exploded. At the beginning of 2018, Roblox had 4.4 million users in the United States and Canada[21]. By the second quarter of 2026, the platform reported approximately 123 million daily active users worldwide, representing approximately 10% year-over-year growth.[22] Those users spent approximately 29 billion hours on the Roblox platform during that time period alone.[23] Roblox's financial growth has been

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[12] *How Do I Change My Age?*, Roblox Support, https://en.help.roblox.com/hc/en-us/articles/360031323611-How-do-I-change-my-age (last visited Sept. 15, 2026).
[13] *Turn Your Creativity into Income on Roblox*, Roblox Creator Hub, https://create.roblox.com/docs/monetize (last visited Nov. 1, 2026).
[14] *Parental Controls Overview*, *supra* note 7.
[15] Roblox Corp., *2025 Annual Report* 32-33 (2026). https://s27.q4cdn.com/984876518/files/doc_financials/2025/ar/Roblox-2025-Annual-Report-and-2026-Proxy-Statement_Bookmarked.pdf (2026).
[16] *Id.*
[17] *Id.*
[18] *Id.*
[19] *Id*.
[20] *Roblox Kids and Select*, Roblox Creator Hub, https://create.roblox.com/docs/production/publishing/kids-and-select (last visited Sept. 15, 2026).
[21] *Roblox User and Growth Stats You Need to Know,* Backlinko (Jan. 23, 2026), https://backlinko.com/roblox-users.
[22] Roblox Corp., *Shareholder Letter Q2 2026*, *supra* note 2, at 8.
[23] *Id*.

equally significant. The company reported $1.5 billion in revenue for the second quarter of 2026, a 36% increase year-over-year.[24]

Roblox itself recognizes that its broad age demographic makes it fundamentally different from other gaming platforms. Its users range from children as young as 5 to adults over the age of 25.[25] That distinction matters. Unlike traditional gaming platforms, Roblox brings millions of children and adults, who otherwise would be very unlikely to ever cross paths, together in a shared, interactive environment with little to no oversight.

A. Children are a Core Demographic of Roblox

Children are not a peripheral audience on Roblox. They represent a substantial portion of its user base and are central to the company's continued growth.

As of the second quarter of 2026, Roblox reported approximately 123 million daily active users.[26] Approximately 73% of those users are under the age of 18.[27] The platform is particularly popular among children under 13. At the end of 2024, Roblox estimated that approximately 40% of its daily active users were under the age of 13.[28]

The company's more recent disclosures reinforce the commercial importance of this demographic. In its 2025 annual report, Roblox acknowledged that "a large number of our users are under the age of 13".[29] The company specifically warned that losing users in this age group could negatively affect its user retention, growth, and engagement. It further acknowledged that it might not be able to attract users in other demographics sufficiently to compensate for the loss of these younger users.[30]

It is without question that these children are highly profitable and essential to the success of Roblox. Roblox even going as far as partnering with Sesame Street to increase engagement by its youngest users.[31]

Roblox's business model combines gaming, social interaction, and in-game commerce in a way that encourages users to spend time, interact with others, and make purchases within the platform. Roblox integrates gaming with shopping and social interactions, allowing users to create customizable avatars and collaborate, compete, and connect with others in real time.[32] These social features are particularly compelling to children because children want to fit in and

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[24] *Id*. at 2.
[25] Roblox Corp., *Safety at Roblox*, *supra* note 10.
[26] Roblox Corp., *Shareholder Letter Q2 2026*, *supra* note 2, at 8.
[27] Bryan, *supra* note 3.
[28] Roblox Corp., *2024 Annual Report* 46 (2025).
[29] Roblox Corp., *2025 Annual Report*, *supra* note 15, at 32.
[30] *Id*.
[31] Press Release, Sesame Workshop, *Sesame Street: Neighborhood Adventures, an Immersive Digital Experience, Launches on Roblox* (Oct. 7, 2025), https://sesameworkshop.org/about-us/press-room/sesame-street-neighborhood-adventures-an-immersive-digital-experience-launches-on-roblox/.
[32] Criscillia Benford & Rachel Franz, Fairplay, *Buying to Belong: Youth and Virtual Assets in the Metaverse* 7 (2025), https://fairplayforkids.org/wp-content/uploads/2025/02/Buying-to-Belong.pdf [hereinafter Buying to Belong]; *Request for Investigation of Roblox Corp.*, supra note 4, at 4.

have social status – they want to belong. But these features also create some of the platform's most significant safety risks by providing opportunities for adults to access children, initiate contact, groom them, and ultimately exploit them.

As discussed below, the very features that make Roblox engaging and commercially successful also create opportunities for serious harm to children.

III. Roblox's Problematic Design: Prioritizing Profit Over Protection

Roblox's fundamental design problem is that it has built a platform heavily marketed to and used by children yet allows children and adults to interact within the same digital environment without consistently applying the safeguards necessary to protect its youngest users. Rather than creating meaningful barriers between adults and children, Roblox has created a shared social environment in which they can connect, communicate, and interact. This design prioritizes and increases profits, but it comes at a significant cost to child safety.

The consequences are serious. Roblox has created an environment in which adult strangers can readily access children and initiate relationships through gaming and social features. Yet the company has failed to implement consistent safeguards across the platform's communication channels. Even more troubling, chat features developed by third-party creators operate outside Roblox's own safety protections, creating gaps that undermine the safeguards the company publicly promotes.

A. Child Safety and the Risk of Sexual Exploitation

As NCOSE and Fairplay explained in our Request for Investigation to the Federal Trade Commission (FTC):

"Roblox's appeal to children is driven not only by playing games and experiences within Roblox, but also by the social features that allow children to interact with other players in real time. These features, including both text and voice chat capabilities, are a source of substantial harm to children, facilitating predation and abuse by enabling adult contact with minors. These harms have persisted on Roblox for years, and recent changes have not eliminated opportunities for adult-minor contact."[33]

Beginning in 2023, including as recently as early November 2026, our researchers independently tested these risks. They were able to accept friend suggestions generated by Roblox without age verification, parental notification, or parental consent. Once connected, they could communicate with these purported friends and receive invitations to join different experiences.

In response to mounting scrutiny over the couple of years, Roblox has introduced new communication settings, parental control settings, age-based content restrictions, and age verification requirements. However, the effectiveness of these safeguards is undermined by significant inconsistencies in how they apply across the platform.

[33] *Request for Investigation of Roblox Corp.*, supra note 4, at 44.

These safeguards include introducing age-based communication and content restrictions, many of which are complex and difficult for parents to understand and manage.

Under its current framework, users ages five through eight may access experiences rated "Minimal" or "Mild," with chat disabled by default unless the account meets certain age-verification and parental-linking requirements. Users ages nine through fifteen may access experiences rated "Minimal," "Mild," or "Moderate," with chat similarly subject to age-verification requirements. Users ages sixteen and older may access experiences across the content-rating categories, with chat enabled by default.

To understand the inconsistencies in these safeguards, it is important to understand the different chat options on Roblox. Roblox offers three primary types of built-in chats: experience chat, party chat, and direct chat. Experience chat is "messaging between users who are playing the same game."[34] Party chat, by contrast, allows users to communicate through a separate chat feed with other users they are connected to as friends on Roblox.[35] Direct chat is private "messaging between two users who are playing the same game."[36]

However, these protections do not operate consistently across Roblox's communication features. In testing, researchers found that the age-based restrictions appeared to apply to experience chat, but not equally to party chat. Using an account registered as belonging to a five-year-old, researchers found that party chat and the ability to be added to party groups were enabled by default. Researchers also identified inconsistencies between the actual party chat settings and the communication settings represented in Roblox's published age-group chart.[37]

This distinction is critical for parents. Roblox's public-facing safety materials do not clearly communicate that different built-in chats may operate under different rules. Further, as of early November 2026, Roblox still imposes significant restrictions on parental oversight as children age. In most regions around the world, parents can manage all settings on a child's account only through age 12. Once a child reaches age 13, certain controls shift to the child, while parents retain authority over only select settings. By age 16, parents lose the ability to manage most account settings, although they retain limited access to their child's activity and spending information. At age 18, the parent's account is automatically unlinked.[38]

In order to do any of this, however, a parent must create their own account, link to their child's account, and tread through the buried communication settings.[39] As of November 2026, Roblox appears to be "gradually" rolling out a new feature, "parent mode."[40] With "parent mode," parents are able to approve requests and manage settings on their child's account, except settings

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[34] *Id.* at 45; *Safety FAQ,* Roblox, https://about.roblox.com/safety-faqs (last visited Nov. 5, 2026).
[35] *Party FAQ*, Roblox, https://en.help.roblox.com/hc/en-us/articles/32461054421012-Party-FAQ (last visited Nov. 5, 2026); *Safety FAQ,* Roblox, https://about.roblox.com/safety-faqs (last visited Nov. 5, 2026).
[36] *Safety FAQ,* Roblox, https://about.roblox.com/safety-faqs (last visited Nov. 5, 2026).
[37] *Id.*; *Parental Controls Overview*, Roblox Support, https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview (last visited Nov. 1, 2026).
[38] *What Happens as My Child or Teen Gets Older on Roblox?*, *supra* note 8.
[39] *Id.*
[40] *Id.*

that send real-time alerts such as spending notifications, without having to create their own account.[41]

Important to note is that, to add another level of complication, parents must sort through different restrictions for different types of chats. For experience chat and direct chat, there are separate parental controls. A parent can disable one without necessarily disabling the other. Party Chat is a separate control. Turning off Roblox's standard experience chat and direct chat does not necessarily prevent a child from communicating through creator-developed chat systems. And those controls are separate from the Party Chat functionality.[42]

Despite promoting its expanded safety policies and parental controls, Roblox's own disclosures reveal a significant exception to these protections. The company states that its communication controls allow parents to determine whom their children can communicate with and that users seeking to communicate must confirm their age through facial age estimation or identification verification.[43] But buried within its parental controls documentation and written in the finest of prints is a critical caveat: "these settings do not apply to chat features developed independently by developers."[44] In other words, Roblox's age-verification and communication safeguards do not necessarily apply to communication features built independently by developers within their experiences.

As explained in the NCOSE and Fairplay FTC Request for Investigation, developers can create their own in-experience chat features that allow users to communicate outside Roblox's built-in chat system. These features can appear indistinguishable from Roblox's native chat functions yet operate without the same safety protections.[45]

This is not a minor technical distinction; it is a loophole and a significant gap in the platform's safety architecture. Roblox has implemented age verification and communication restrictions for certain built-in features while allowing developers to create alternative communication channels that bypass those protections. The result is that a child may appear protected by Roblox's safety settings while remaining accessible through communication features those settings do not govern.

NCOSE and Fairplay identified this vulnerability during research conducted in January 2026 for the FTC Request for Investigation. Yet, as of our subsequent review in November 2026, Roblox had still not closed this gap. This is particularly concerning given that developer-created experiences are central to Roblox's business model and its financial relationship with creators.

Roblox's content restrictions also leave young children exposed to material that raises serious age-appropriateness concerns. Under its content maturity framework, children as young as five may access experiences rated "Minimal" or "Mild," which can include "occasional violence

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[41] *Parents: How to Link Your Account*, Roblox Support, https://en.help.roblox.com/hc/en-us/articles/30428321333140-Parents-How-to-Link-Your-Account (last visited Nov. 3, 2026).
[42] *Parental Controls*, Roblox, https://about.roblox.com/parental-controls?ac=210001 (last visited Nov. 3, 2026); *Party FAQ*, Roblox, https://en.help.roblox.com/hc/en-us/articles/32461054421012-Party-FAQ (last visited Nov. 5, 2026); *Safety FAQ*, *supra* note 36.
[43] *Parental Controls Overview, supra* note *7*.
[44] *Id.*

[45] *Request for Investigation of Roblox Corp.*, supra note 4, at 47.

and/or light unrealistic blood."[46] Our researchers found that accounts registered as belonging to five-year-old users were also encouraged to engage with experiences involving romantic role-play, fear-inducing scenarios—including interactions with strangers while supposedly "home alone"—and violent themes, including experiences featuring "get your death penalty."

These findings raise serious questions about the effectiveness of Roblox's age-based content ratings and its ability to prevent young children from encountering experiences that are inappropriate for their developmental age. The fact that our researchers, all over the age of 30, were able to encounter these experiences while posing as five-year-old users further illustrates how readily the platform exposes its youngest users to content that may appeal to substantially older audiences.

Ultimately, Roblox's design creates multiple pathways through which children can be exposed to predators, inappropriate content, and potential exploitation. Its safety measures address only portions of the platform, leaving glaring gaps in the very features that facilitate communication and interaction. Roblox has been aware of these risks for years, yet its response has remained largely reactive and incomplete.

A safety system that can be bypassed through features operating within the platform itself is not a comprehensive child-safety system.

B. Roblox Has Been on Notice for Years of Sexual Exploitation on Its Platform

What happens to children when these design failures are exploited by adults seeking to groom and sexually exploit them?

Roblox has been alerted to the answer to this question for years.

Families, child-safety advocates, law enforcement, and other organizations have repeatedly raised concerns about sexual exploitation occurring on its platform. Yet, meaningful safety improvements failed to keep pace with the known risks. During that time, children were groomed, sexually abused, sexually extorted, kidnapped, and, in some cases, killed by adults they met through Roblox. The company's more recent safety changes are welcome, but they came only after nearly a decade of documented warnings and serious harm to children. And, as discussed above, significant vulnerabilities remain.

The FTC Request for Investigation filed by NCOSE and Fairplay documented this longstanding pattern. The following cases, drawn from public reporting, illustrate the serious and recurring nature of the harm dating back to 2017[47]:

- In September 2026, a 39-year-old was indicted by a federal grand jury for the kidnapping (which resulted in death) and sexual exploitation of a 17-year-old Indianna teenager that he met on Roblox.[48]

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[46] *Content Ratings*, Roblox Creator Hub, https://create.roblox.com/docs/production/promotion/content-maturity (last visited Sept. 16, 2026).
[47] *Request for Investigation of Roblox Corp.*, supra note 4, at 56-58.
[48] *Federal Grand Jury Indicts Columbus Man for Murder of Indiana Teen* (Sept. 23, 2026), https://www.justice.gov/usao-sdoh/pr/federal-grand-jury-indicts-columbus-man-murder-indiana-teen.

- In January 2026, a 12-year-old girl and a 15-year-old girl were kidnapped by a man who authorities said they began communicating with on Roblox in 2025.[49]
- In September 2025, a mother filed a wrongful death lawsuit after her teenage, autistic son died by suicide following sextortion by an alleged predator who contacted him on Roblox.[50]
- In August 2025, a lawsuit was filed in California against Roblox and Discord after a 10-year-old girl was groomed and abducted from her home. The perpetrator posed as a minor to groom the child and manipulated her into sharing her home address.[51]
- In July 2025, a lawsuit was filed after a 13-year-old girl was groomed, kidnapped, taken across state lines, and sexually assaulted by a man she met on Roblox.[52]
- In 2024, police arrested more than 2 dozen people associated with a pedophile ring on Roblox. These people were arrested for abducting and/or abusing children they had met on Roblox since at least 2018.[53]
- In October 2023, an 11-year-old girl from New Jersey was kidnapped by a man she played video games with on Roblox.[54]
- In June 2023, a minor "under 16" was sexually abused in California by a 21-year-old man she met on Roblox.[55]
- In April 2023, a 13-year-old boy from Utah met a predator on Roblox, was groomed publicly on Twitter, then kidnapped and sexually assaulted before being rescued.[56]
- In April 2023, a 14-year-old girl from Ohio was sexually assaulted by a man she met on Roblox. The man posed as a 17-year-old on the platform and convinced the girl to send him nude images before picking her up from school and sexually assaulting her.[57]

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[49] Mason Leib, *Siblings Rescued After Alleged Kidnapping by 19-Year-Old They Met on Roblox*, ABC News (Feb. 3, 2026), https://abcnews.com/GMA/News/siblings-rescued-after-alleged-kidnapping-19-year-met/story?id=129794514.

[50] Alexandra Klausner, Roblox, *Discord Sued over Teen Boy's Suicide After Alleged Sexual Abuse Online*, N.Y. Post (Sept. 15, 2025), https://nypost.com/2025/09/15/business/roblox-discord-sued-over-teen-boys-suicide-after-alleged-sexual-abuse-online.

[51] Emily Van de Reit, *Family Files Lawsuit Saying Roblox, Discord Failed to Protect 10-Year-Old Daughter From Being Abducted*, WAFB 9 News (Aug. 11, 2025), https://www.wafb.com/2025/08/11/family-files-lawsuit-saying-roblox-discord-failed-protect-10-year-old-daughter-being-abducted/.

[52] *Family Sues Roblox, Grooming, Kidnapping Lawsuit – SGGH & Milberg*, EZ Newswire (Aug. 12, 2025) https://www.eznewswire.com/newsroom/family-sues-roblox-grooming-kidnapping-lawsuit-sggh-milberg.

[53] Cecilia D'Anastasio, *Roblox's Pedophile Problem*, Bloomberg (July 23, 2024), https://www.bloomberg.com/features/2024-roblox-pedophile-problem/.

[54] *Roblox Kidnapping in New Jersey: Online Grooming Case Raises Concerns*, ABC 7 New York (Oct. 21, 2023), https://abc7ny.com/roblox-kidnapping-new-jersey-online-grooming/13927383/ (last visited Oct. 29, 2025).

[55] Kaley Soren, Man Arrested after Sexually Abusing Minor He Met on Roblox: BPD, KGET 17 News (June 27, 2023), https://www.kget.com/news/crime-watch/man-arrested-after-sexually-abusing-minor-he-met-on-roblox-bpd/ (last visited Oct. 29, 2025).

[56] Ben Goggin, *A 13-Year-Old Boy was Groomed Publicly on Twitter and Kidnapped, Despite Numerous Chances to Stop It*, NBC News (Apr. 25, 2023), https://www.nbcnews.com/tech/social-media/twitter-elon-musk-boy-kidnapped-groomed-discord-roblox-mcconney-rcna77985.

[57] Dave Spencer, *Feds: Saline Man Met Girl, 14, Playing Roblox Online Game and Sexually Assaulted Her*, FOX 2 Detroit (Apr. 26, 2023), https://www.fox2detroit.com/news/feds-saline-man-met-girl-14-playing-roblox-online-game-and-sexually-assaulted-her.

- In March 2023, a 40-year-old California man was arrested after traveling across the country to sexually abuse a 14-year-old he met and groomed on Roblox.[58]
- In February 2022, a 13-year-old girl in Topeka was rescued from a man she met on Roblox who was sex trafficking her.[59]
- In 2022, an 8-year-old girl in North Carolina was targeted by an online predator on Roblox who asked her to send him "hot videos." The girl's mother said she had parental controls on all the devices her kids used.[60]
- In April 2022, a Florida man was arrested after kidnapping a 12-year-old boy he met on Roblox. The man's charges included sexual battery of a child under 12, kidnapping of a child under 13, traveling to meet a minor for sex, and child abuse.[61]
- In 2021, an 11-year-old girl in California went missing and was found with her abuser, who used Roblox to groom and lure her to his friend's apartment, where he attempted to take his own life when police arrived to rescue the girl.[62]
- In 2021, a 12-year-old boy in Texas was solicited by a 23-year-old man on Roblox. The man was charged with indecent solicitation of a child, violation of sex offender registry, and grooming.[63]
- In 2019, an 18-year-old man was charged with 26 counts of child pornography after soliciting nude images from children ages 10 to 12 on Roblox.[64]
- In 2017, a 12-year-old boy in New Jersey was groomed by an adult Virginia man on Roblox.[65]

These cases are not isolated incidents.

They demonstrate a troubling pattern spanning nearly a decade: adults have repeatedly used Roblox to access children, establish relationships with them, and facilitate grooming, sexual exploitation, and offline abuse. The recurring nature of these cases raises serious questions about

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[58] Bill Shannon, *Man Traveled Across the Country to Sleep with Altoona Teen, Police Report*, WTAJ News (Mar. 13, 2023), https://www.wtaj.com/news/local-news/man-traveled-across-the-country-to-sleep-with-altoona-teen-police-report/.
[59] Mark Feuerborn, *Accused Topeka Teen Trafficker Found with Child Porn, Court Filing Says*, KSNT News (May 5, 2022), https://www.ksnt.com/news/local-news/accused-topeka-teen-trafficker-found-with-child-porn-court-filing-says/.
[60] Anna Austin Boyers and Debra Worley, *Girl, 8, Targeted by Child Predator on Roblox, Mom Says*, WCJB 20 News (July 11, 2022), https://www.wcjb.com/2022/07/11/girl-8-targeted-by-child-predator-roblox-mom-says/.
[61] Jorge Borges, *Florida Man Arrested for Kidnapping a Child He Met on Roblox*, Tampa Free Press (Apr. 17, 2022), https://www.tampafp.com/florida-man-arrested-for-kidnapping-a-child-he-met-on-roblox/.
[62] Alexis Rivas, *National City Kidnapping Case Highlights Growing Role of Gaming Apps in Child Exploitation*, NBC 7 San Diego (Feb. 7, 2021), https://www.nbcsandiego.com/news/national-international/national-city-kidnapping-case-highlights-growing-role-of-gaming-apps-in-child-exploitation/2513779/.
[63] Jeff Bonty, *Man Charged with Soliciting Juvenile through Roblox*, Shaw Local Daily Journal Kankakee, IL (July 23, 2021), https://www.daily-journal.com/news/crime/man-charged-with-soliciting-juvenile-through-roblox/article_d5459446-eb22-11eb-8fdc-1f1054f1f8d9.html.
[64] Nick Samuel, *Man Charged with 26 Counts of Child Porn, Used Online Game to Target Children*, Vero News (Aug. 21, 2019), https://veronews.com/2019/08/21/man-charged-with-26-counts-of-child-porn-used-online-game-to-target-children/.
[65] Pei-Sze Cheng, *I-Team: NJ Mom Says Sexual Predator Targeted 12-Year-Old Son on Roblox*, NBC New York (Dec. 4, 2018), https://www.nbcnewyork.com/news/local/i-team-nj-mom-says-sexual-predator-targeted-12-year-old-son-roblox/103960/.

why the platform's safety measures failed to prevent such conduct and why meaningful protections took so long to implement.

The concerns extend beyond criminal prosecutions. At least ten state attorneys general—Louisiana, Kentucky, Texas, Florida, Iowa, Tennessee, Nebraska, Indiana, Oklahoma, and Arkansas—have filed civil lawsuits against Roblox.[66] These actions reflect growing governmental concern about the company's practices and the risks its platform poses to children.

Independent investigations and advocacy organizations have also repeatedly documented these vulnerabilities. As detailed in the NCOSE and Fairplay FTC Request for Investigation, NCOSE placed Roblox on its Dirty Dozen List in Spring 2023 and formally notified the company of serious child-safety concerns.[67] At the time, adult strangers could send direct messages and friend requests to children, even when parental controls purported to disable chatting.[68] In-game chat was enabled by default, allowing unrestricted communication between young children and adults.[69] The platform's filtering systems failed to adequately block inappropriate content, parents could not monitor private messages or prevent strangers from sending friend requests, and children were exposed to sexually explicit material.[70] NCOSE specifically warned Roblox that its inadequate parental controls created a false sense of security while leaving children vulnerable to grooming and exploitation.[71]

NCOSE again placed Roblox on its Dirty Dozen List in Spring 2024 and sent the company another formal notification letter outlining continuing platform harms.[72] Rather than adequately addressing existing communication vulnerabilities, Roblox introduced Roblox Connect, a feature enabling voice calls and providing additional opportunities for adults to communicate with minors. Voice chat, available to users over 13 with phone verification, created opportunities for real-time verbal interactions between adults and children. Reports included minors overhearing sexual conversations and inappropriate noises.[73]

At the time, child-safety advocates, including NCOSE, warned Roblox about the dangers of introducing this feature without adequate safeguards. NCOSE specifically cautioned:

> "Voice chats are a known method predators use for grooming – as it is near impossible to monitor them. There have been multiple cases of predators using Roblox to sexually exploit, abuse, even kidnap, children. Yet instead of prioritizing greater measures to

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[66] Matthew T. Marin, *Which States Have Sued Roblox? The Attorney General Enforcement Wave,* https://marinmurphylaw.com/roblox-lawsuit/state-lawsuits-against-roblox (updated October 2026).
[67] Letter from Nat'l Ctr. on Sexual Exploitation to Roblox (May 1, 2023) (on Notification for being placed on the 2023 Dirty Dozen List for facilitating child sexual exploitation and abuse to Roblox) (on file with author).
[68] *Id.*
[69] *Id.*
[70] *Id.*
[71] *Id.*
[72] Letter from Nat'l Ctr. on Sexual Exploitation to Roblox, *supra* note 67; Nat'l Ctr. on Sexual Exploitation, *Roblox: 2024 Dirty Dozen List,* https://endsexualexploitation.org/roblox/ (last visited Nov. 3, 2026).
[73] Press Release, Nat'l Ctr. on Sexual Exploitation, *Roblox Provides Predators with a New Tool to Connect with Kids* (Nov. 17, 2023), https://endsexualexploitation.org/articles/roblox-provides-predators-with-a-new-tool-to-connect-with-kids/; *Risks to Children Playing Roblox 'Deeply Disturbing', Researchers Say*, TBS News (April 14, 2025), https://www.tbsnews.net/tech/risks-children-playing-roblox-deeply-disturbing-researchers-say-1115801.

> safeguard kids, the company irresponsibly chose to release a feature that may very well provide predators with yet another way to reach potential victims."[74]

Despite this warning, Roblox failed to implement adequate parental approval, identity verification, and other effective safeguards at the time, leaving children vulnerable to inappropriate interactions with adults.

Not only did Roblox ignore the warnings of NCOSE, but they also ignored the findings from independent investigations that reached similar conclusions. In April 2025, Revealing Reality published an investigation finding that adult testers could readily friend child accounts, enter sexually suggestive hotel environments with child accounts, and encounter adult-themed conversations.[75]

For example, investigators reported that they "found that their [minor-aged] test avatars overheard conversations between other players verbalizing sexual activity, as well as repeated slurping, kissing and grunting noises, when using the voice chat function."[76] This occurred despite Roblox's representations that voice communications were subject to real-time AI moderation. Investigators also found that an adult account could request the Snapchat information of a five-year-old test avatar using barely coded language.[77]

Revealing Reality published a follow-up investigation in May 2025. Although some overtly inappropriate content had been removed following Roblox's 2025 safety updates, investigators continued to identify vulnerabilities. Adults could still misrepresent their ages, and experiences marketed as innocuous, including "Mic Up" and "Therapy Sessions," continued to permit private voice conversations between adults and minors without adequate moderation.[78]

Despite years of warnings, investigations, and documented cases of harm, significant safety gaps remained as of November 2026. These include the developer-created chat loophole discussed above, inadequate barriers to adult-minor interactions, and parental controls that remain difficult to navigate and insufficient to protect children across the platform. Closing these gaps would require meaningful changes to Roblox's business model and user experience—not simply incremental adjustments to its existing safety settings.

Roblox's own corporate disclosures help explain why these changes may conflict with its business interests. In its 2025 annual report, under the heading "If We Are Unable to Further Monetize Our Platform and User Base, Our Business Will Suffer," Roblox identified several risks to its ability to generate additional revenue, including:[79]

- "Measures intended to make our Platform more attractive to older users create the perception that our Platform is not safe for younger users;"

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[74] *Risks to Children Playing Roblox*, *supra* note 73.
[75] *A Digital Playground? The Real Guide to Roblox*, Revealing Reality (Apr. 13, 2025),https://think.revealingreality.co.uk/roblox-real-guide.
[76] *Risks to Children Playing Roblox 'Deeply Disturbing', Say Researchers*, TBS News (April 14, 2025),https://www.tbsnews.net/tech/risks-children-playing-roblox-deeply-disturbing-researchers-say-1115801.
[77] *Id.*
[78] *Four Months On: Is Roblox Any Safer?*, Revealing Reality (May 9, 2025),https://think.revealingreality.co.uk/roblox-updated.
[79] Roblox Corp., *2025 Annual Report*, *supra* note 15, at 33-34.

- "We fail to incentivize creators on our Platform to develop content that our users consider to be of value;"
- "Our paying users stop interacting with our Platform and purchasing Robux as they increase in age;" and
- "If paying users reduce their spend on our Platform due to reasons such as the need to reduce household expenses or the perception that competitive services provide better value."[80]

These disclosures are revealing. Roblox expressly recognizes that its younger users are essential to its continued engagement, retention, and monetization. It also recognizes that changes affecting its appeal to different age groups, creator incentives, and user spending could negatively affect its business.

That brings us to another critical concern: Roblox is not only exposing children to risks of sexual exploitation; its business model also creates financial incentives to maximize the time children spend on the platform and the money they spend within it. The more time children spend interacting, playing, and socializing on Roblox, the more opportunities they have to encounter strangers and potentially predatory adults. These risks are interconnected. The same engagement-driven design that generates revenue for Roblox can also increase children's exposure to the very risks the company has repeatedly been warned to address.

C. Child Safety and Financial Exploitation

Roblox's design and business model place its financial interests – particularly increasing profit and user engagement – in direct tension with children's developmental needs and safety. As discussed above, these design choices expose children to real-world harms, including the risks documented in our FTC Request for Investigation.

Roblox has expressly acknowledged its dependence on both its creators and its users. The company has stated plainly in its' 2025 Annual Report that, "we depend on our creators to create digital content that our users find compelling, and if we fail to properly incentive our creators to develop and monetize content, our business will suffer."[81] However, in the same document, just a few lines later, the platform states, "our users will stop interacting with our platform and purchasing Robux as they increase in age."[82] These statements reveal how heavily the platform relies on its young users *and* its developers for profit, and if that is true, why do the platforms communication safety settings *not* apply for to developer created chats?[83] This puts the platforms interests in making money directly at interest with prioritizing child safety.

i. Design Features That Incentivize Prolonged Engagement

Roblox's business model depends in part on keeping users engaged and encouraging them to spend money on the platform. The longer users remain engaged, the more opportunities Roblox has to generate revenue through virtual asset transactions and other purchases. That incentive is particularly concerning on a platform whose user base includes millions of children.

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[80] *Id*.
[81] Roblox Corp., *2025 Annual Report*, *supra* note 15, at 32.
[82] *Id.* at 33.
[83] *Parental Controls Overview*, *supra* note 7.

Prolonged engagement also means prolonged exposure to the platform's risks, including opportunities for contact with adults and potential exploitation. As discussed above, Roblox identifies the amount of time users spend on its platform as a factor affecting its financial performance. Its annual report warns that its business could suffer if it fails to "increase or maintain the amount of time spent on our platform."[84]

Roblox employs a range of design and marketing techniques to encourage users—particularly young users—to remain engaged and spend money. As detailed in the FTC Request for Investigation, these techniques include scarcity marketing, visible inventories, variable rewards, and time-based rewards.[85] One of Roblox's most appealing features for young users is the ability to purchase virtual assets: digital items that allow users to customize their avatars or enhance their gameplay.

These virtual assets are used in the Roblox Marketplace where users can purchase items that change how their avatars look and move, including character bodies and heads, clothing, accessories, animations, and other cosmetic items.[86] Some virtual assets are created by Roblox, while others are created by developers, including children and professionals working for third-party companies. The Marketplace offers millions of items for sale.

These assets are not merely decorative to many young users. Fairplay's *Buying to Belong: Youth and Virtual Assets in the Metaverse* report found that children value avatar customization as a way to express their identities and connect with other players. Participants also described how children with default, un-customized avatars can be teased or labeled "noobs" or "defaults."[87] In other words, virtual assets can become a means of social belonging—and the absence of those assets can expose children to ridicule or exclusion.[88]

Roblox's Marketplace, together with the tools and incentives it provides to developers, uses marketing tactics designed to make virtual assets more appealing and encourage purchases.[89] These include:

- Scarcity marketing: Making certain assets available in limited quantities, creating pressure to purchase before they are no longer available.
- Visible inventories: Allowing users to display the items they own, which can encourage further purchases to demonstrate status or collection size.
- Time-based rewards: Offering items or rewards for a limited period, encouraging users to return to the platform or make purchases before the opportunity expires.[90]

These tactics can create a sense of urgency and pressure to keep checking the platform. For example, the Seed Shop in the popular Roblox experience Grow a Garden refreshes every five

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[84] Roblox Corp., *supra* note 15, at 33.
[85] *Request for Investigation of Roblox Corp.*, *supra* note 4, at 10.
[86] *Monetize Avatar Items*, Roblox Creator Hub, https://create.roblox.com/docs/monetize-avatar [https://archive.is/2Ngdk] (last visited Sept. 17, 2025); *Request for Investigation of Roblox Corp.*, *supra* note 4, at 10.
[87] Criscillia Benford & Rachel Franz, Fairplay, Buying to Belong: Youth and Virtual Assets in the Metaverse 7 (2025), https://fairplayforkids.org/wp-content/uploads/2025/02/Buying-to-Belong.pdf [hereinafter Buying to Belong]; *Request for Investigation of Roblox Corp.*, *supra* note 4, at 70.
[88] *Buying to Belong*, *supra* note 32, at 22.
[89] *Request for Investigation of Roblox Corp.*, *supra* note 4, at 13-27.
[90] *Id.*

minutes.[91] Some of the *Buying to Belong* focus group participants shared that they check in-experience shops every time they refresh throughout the day.[92] In the words of a 14-year-old from one of the focus groups:

> "I find that when things are limited it makes the… like the rush about them, I guess, like the general excitement that they're there more intense. Because if something's not limited, people generally are just like, 'Okay, well, I don't need to buy this now. I can buy it whenever I want, if I decide to later.' But if it's limited, there's, like, a lot of pressure to get it now. Because what if it turns into a really valuable item in the future. What if you decide later on that you should have bought it and you can't? You know it's like there's this sort of, like, pressure to stay on top of, like, the, like, best items or whatever."[93]

There are both significant financial consequences and risks for exploitation because virtual assets can carry substantial social value for children. Financially, the pressure to obtain the virtual assets can cause users to spend real money to purchase these assets. This pressure also creates opportunities for manipulation and exploitation; Predators can use the promise of Robux or limited-time virtual items to entice children into sexualized interactions or to solicit nude images.

This is not merely a theoretical concern. In February 2026, Florida's Attorney General announced the arrest and extradition of a 29-year-old man accused of using Snapchat and Roblox to exploit a child. According to the Attorney General's announcement, the man used Roblox's in-game currency, Robux, to entice the child to provide child sexual abuse material.[94]

Roblox's engagement and monetization strategies therefore create risks beyond excessive spending. They can reinforce the importance children place on virtual assets, encourage repeated engagement with the platform, and provide predators with another tool to manipulate children. A platform that profits from children's desire to participate, belong, and remain engaged must take seriously how those same incentives can be exploited to harm them.

IV. Conclusion

Although Roblox has implemented certain safeguards, many of these measures have been reactive and have left significant loopholes, as discussed above. The persistence of these gaps raises serious concerns about whether Roblox's safety measures are designed to meaningfully protect children or whether they preserve features that support the company's engagement and monetization objectives. Voluntary measures alone are insufficient. Children should not have to depend on public scrutiny or government attention to ensure that a platform takes their safety seriously.

Roblox needs to stop making child safety so complicated. Its safety standards should be clear, transparent, and designed to prioritize children's safety over user engagement. For example,

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[91] *Seed Shop*, Grow a Garden Wiki | Fandom, https://growagarden.fandom.com/wiki/Seed_Shop (last visited May 19, 2026); *Request for Investigation of Roblox Corp.*, supra note 4, at 13.
[92] *Buying to Belong*, *supra* note 32, at 22-24.
[93] *Id.* at 32.
[94] Press Release, Off. of the Att'y Gen., State of Fla., *Attorney General James Uthmeier Announces Arrest, Extradition of Snapchat, Roblox Child Predator* (Feb. 9, 2026), https://www.myfloridalegal.com/newsrelease/attorney-general-james-uthmeier-announces-arrest-extradition-snapchat-roblox-child.

Roblox should eliminate chat for minors and reserve that feature for adults who have verified their age.

Congress must also act to establish enforceable protections for children online. We urge Congress to support meaningful legislation and regulatory measures, including COPPA, reforms to Section 230 that sunset liability protections for platforms like Roblox, the Kids Online Safety Act (KOSA), and the STOP CSAM Act of 2025.

Ultimately, when a company knowingly operates a shared environment populated by millions of children and adults, it has a heightened responsibility to ensure that its design and communication systems adequately protect children. Children's safety must not depend on a company's voluntary choices, and it must never take a back seat to profit.

EXHIBIT A

May 20, 2026

Chair Andrew Ferguson and Commissioner Mark Meador
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, D.C. 20580

Re: Request for Investigation of Roblox Corporation

Via E-Mail

Dear Chair Ferguson and Commissioner Meador:

Fairplay and the National Center on Sexual Exploitation (NCOSE) respectfully request that the Federal Trade Commission (FTC) investigate whether Roblox Corporation is violating Section 5 of the FTC Act. As outlined in the Request for Investigation below, Roblox's engagement-maximizing design features, virtual currency system, and voice and text chat communication features are developmentally inappropriate for the platform's massive young user base and pose a substantial risk of harm.

Fairplay are joined by the following organizations in the submission of this request: Center for Digital Democracy, Consumer Federation of America, Electronic Privacy Information Center (EPIC), Institute for Families and Technology, The Anxious Generation Movement, Young People's Alliance, and ParentsSOS.

Respectfully Submitted,

x__Haley Hinkle_____

x__Brendan Bouffard_____

Counsel for Fairplay

89 South Street, Suite 603
Boston, MA 02111

x_____Khari James_____

x____Dani Pinter_____

Counsel for National Center on Sexual Exploitation

201 F Street NW, Suite 200
Washington, D.C. 20004

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Background and Executive Summary

We begin this Request for Investigation with background information on what Roblox is and how its business model works. Next, we summarize our claims under Section 5 of the FTC Act, as well as a request that the FTC scrutinize Roblox's compliance with the Children's Online Privacy Protection Act (COPPA).

Roblox is one of the most popular social gaming platforms in the world. Its user base has exploded since its public release in 2006. At the beginning of 2018, Roblox had 4.4 million users in the U.S. and Canada; at the end of 2025, it had 24 million U.S. and Canadian users.[1] These millions of users spend incredible amounts of time on Roblox. Over the past three years alone, Roblox's engagement increased by nearly 50%, from 49.3 billion hours of user engagement in 2022 to 73.5 billion hours of user engagement in 2024.[2] Roblox profits substantially off of its large and growing user base: According to the company's 2025 annual report, it earned $3.6 billion in revenue in 2024, up from $2.8 billion the year before.[3]

The platform is particularly popular with minors, especially children under 13 (according to Roblox policy, a child only needs to be 5 years old to create an account).[4] At the height of the COVID-19 lockdown in 2020, Roblox claimed that two-thirds of *all children* ages 9-12 and one-third of all children under 16 used the platform.[5] More recently, the company estimated that approximately 40% of its 82.9 million daily active users were under the age of 13.[6]

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[1] *Roblox User and Growth Stats You Need to Know,* Backlinko (Jan. 23, 2026), https://backlinko.com/roblox-users.

[2] *Cf Roblox Corporation 2025 Proxy Statement and 2024 Annual Report,* Roblox (May, 2025), https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf *with Roblox Corporation 2023 Proxy Statement and 2022 Annual Report,* Roblox (May 25, 2023), https://s27.q4cdn.com/984876518/files/doc_financials/2022/ar/roblox_2023-proxy-and-2022-annual-report_web-ready.pdf.

[3] *Roblox Corporation 2025 Proxy Statement and 2024 Annual Report,* Roblox (May, 2025), https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf; *Roblox Corporation 2024 Proxy Statement and 2023 Annual Report,* Roblox (May, 2024), https://s27.q4cdn.com/984876518/files/doc_financials/2023/ar/roblox-2024-proxy-and-2023-annual-report.pdf.

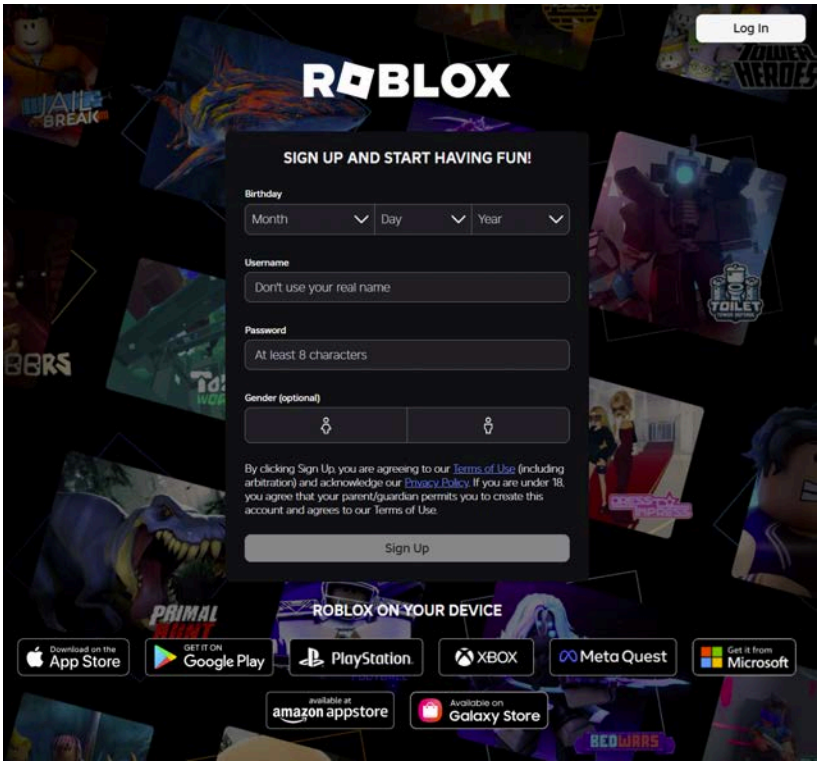
[4] *How do I change my age,* Roblox, https://en.help.roblox.com/hc/en-us/articles/360031323611-How-do-I-change-my-age (last visited Feb. 20, 2026).

[5] Olga Kharif, *Kids Flock to Roblox for Parties and Playdates During Lockdown,* Bloomberg (Apr. 15, 2020), https://www.bloomberg.com/news/articles/2020-04-15/kids-flock-to-roblox-for-parties-and-playdates-during-lockdown.

[6] *Roblox Corporation 2025 Proxy Statement and 2024 Annual Report* Roblox (May, 29, 2025), https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf.

These children are highly profitable to Roblox. The company generates substantial user engagement and revenue by layering video gaming with virtual socialization and endless opportunities for in-game purchases. "Social gaming platforms are online, immersive environments that integrate gaming with shopping and social interactions, enabling players to create customizable avatars and collaborate, compete, and connect with other players in real time."[7] As discussed in more detail below, children are highly attuned to the social aspects of the platform, which also create some of Roblox's most substantial risks by exposing children to harmful adults, grooming, and exploitation.

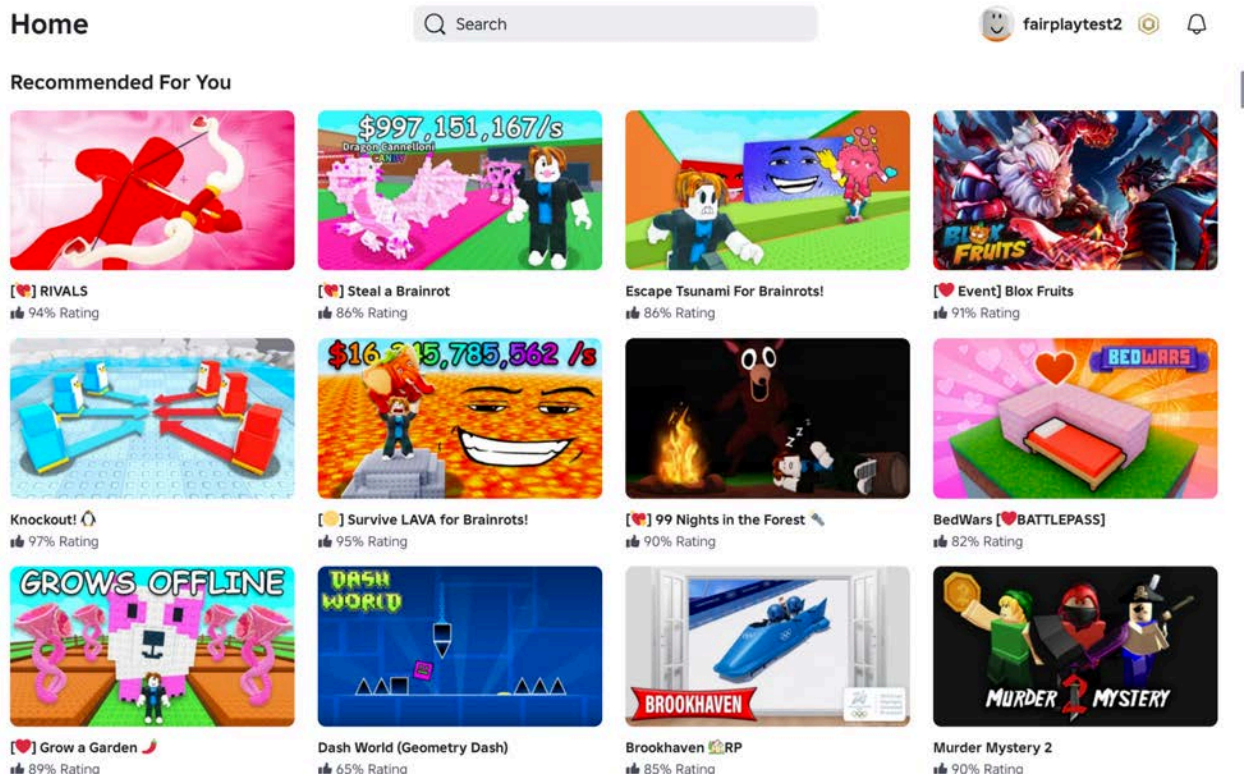
Creating an account on Roblox is shockingly easy. Anyone who wishes to use the platform can open it on their computer, phone, tablet, or gaming console. They must provide a birthdate (with year), username, and password, and they have an option to select a gender. The sign-up process does not require an email account; it does not even require the user to verify their selected password. The company now uses an age assurance process for users who wish to turn on chat features, as described in more detail in Section III below, but it does nothing to verify the birthday and year entered at sign-up.



Roblox only requires users to input a birthdate, username, and password to begin using the platform.

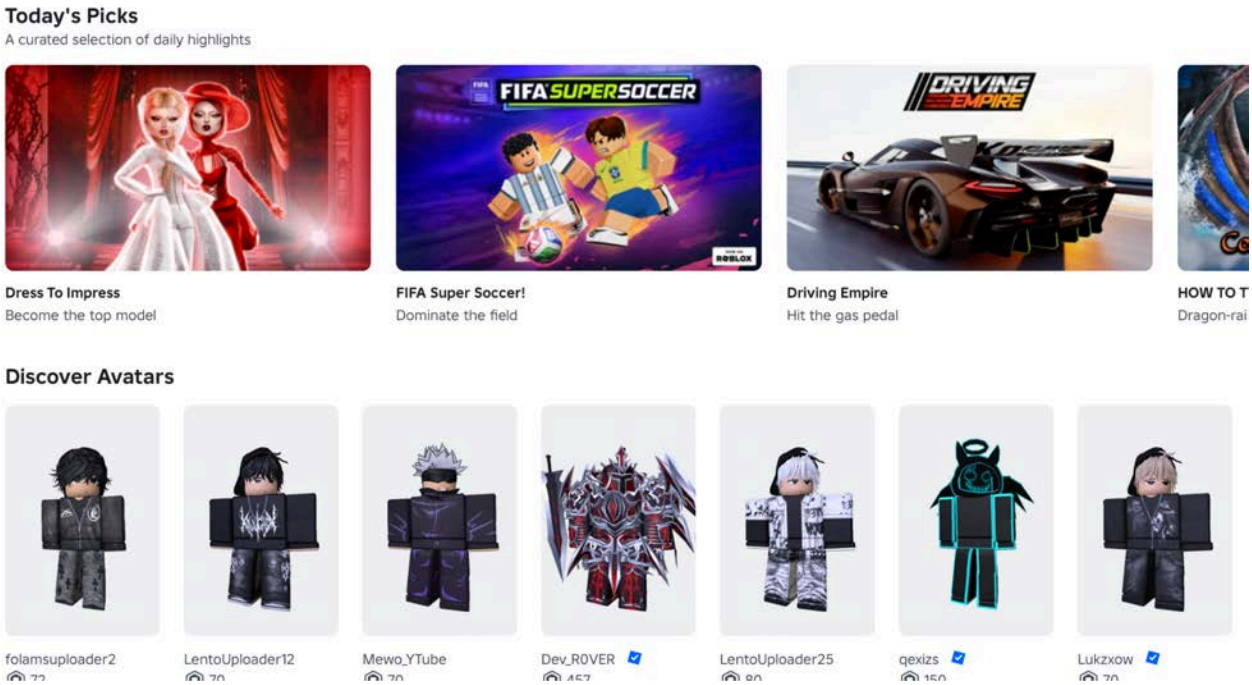
[7] Criscillia Benford & Rachel Franz, *Buying to Belong: Youth and Virtual Assets in the Metaverse*, Fairplay, 7 (Feb. 2025), https://fairplayforkids.org/wp-content/uploads/2025/02/Buying-to-Belong.pdf [hereinafter Buying to Belong].

Once a user has provided their birthday, username, and password, they can build a customizable virtual avatar, as described in more detail in the following Section. Players use these avatars to navigate "experiences," which are games or virtual worlds on the platform. There are over 14 million active experiences on Roblox,[8] and they range from racing, shooting, or obstacle-style games to role-playing or simulations, as well as open-ended, social hang-out spaces where users can communicate through text or voice chat.[9] Roblox works across platforms, meaning that it can be played on a desktop, as a mobile app, on a video game console, or on a tablet.



The Roblox home screen offers a tab displaying suggested games and experiences.

[8] *Roblox Corporation 2025 Proxy Statement and 2024 Annual Report*, Roblox (May, 2025), https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf [hereinafter 2024 Annual Report].
[9] eSafety Commissioner, *What is Roblox?,* Australian Government (Oct. 10, 2025), https://www.esafety.gov.au/key-topics/esafety-guide/roblox#:~:text=Roblox%20is%20a%20game%2Dcreation,Android%20app%20%2C%20Apple%20iOS%20app.



The Roblox home screen offers a tab displaying suggested games and experiences.

These experiences are created not by Roblox, but by people the company calls "creators" and whom we will call developers. Anyone can use Roblox's Creator Hub to build an experience that other players can use. Some developers are individuals (including children),[10] while others work for businesses (independent of Roblox) that build Roblox experiences professionally.[11] There are more than 14 million active experiences on the platform.[12]

Developers are incentivized to create experiences because they can use them to profit off of the platform's in-game economy. Roblox uses a "freemium" model, meaning players can download Roblox and access experiences and certain virtual items for free, but other desirable virtual items can only be accessed by paying for them with the platform's virtual currency, Robux. Roblox splits the Robux profits for virtual item microtransactions with the developers of both the item sold and the experience where the transaction takes place. The company's cut is substantial — 30 to 70% depending on

[10] Luc Rinaldi, *Kids spend countless hours developing games for Roblox. Most never earn a penny,* National Post (Jan. 19, 2024), https://nationalpost.com/news/roblox-kids-online-gaming-platform; Alex Knapp, *Young Developers Earn Over $30M On Roblox In 2017, The Gaming Site Kids Visit More Than Youtube,* Forbes (Mar. 21, 2018), https://www.forbes.com/sites/alexknapp/2018/03/21/young-developers-earned-over-30m-on-roblox-in-2017-the-gaming-site-kids-visit-more-than-youtube/.

[11] Nordicity, *Roblox US Economic Impact Assessment, 2025,* Roblox, 8-9 (2025), https://about.roblox.com/pdf/2024-us-economic-report-en.

[12] *Roblox Corporation 2025 Proxy Statement and 2024 Annual Report,* Roblox, 2 (May, 29, 2025), https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf.

whether an asset is sold in the Marketplace or within an experience.[13] Once a developer has accumulated at least 30,000 Robux (approximately $114, depending on the current exchange rate),[14] they are eligible to join the Roblox Developer Exchange Program, which allows them to cash out their accumulated Robux for fiat (real-world) currency. Virtual currency is central to gameplay on Roblox, and young users report feeling an immense pressure to spend money on the platform, which we explore in detail below.

While the experiences where children play and interact on the platform are designed and run by third-party developers, the ultimate responsibility for the unfair and deceptive acts and practices described in this Request for Investigation lies with Roblox. Roblox Corporation provides the foundation upon which all Roblox developers' experiences are built. It is responsible for all of the capabilities offered to developers through Roblox Studio, and it touts all of the platform's key features to those developers. Further, its microtransaction-driven framework creates economic pressure on those developers, leading to design decisions that often compromise safety. A 2025 interview study of 20 Roblox developers found:

> [I]nterviewees observed several types of risks to child players' safety in their games, such as child-specific deceptive design, gambling-like gameplay, sexual abuse, and scamming. They further reasoned about major causes of these safety risks, such as Roblox's profit-driven monetization model, and leaving the burden of moderation to individual game creators.[15]

Roblox controls the design and functionality of its platform, so this Request for Investigation focuses solely on Roblox Corporation itself, and not the decisions or potential liability of any individual developer.

Roblox's design and business model put the company's interests directly at odds with children's developmental needs, causing them real-world harm.[16] In this Request

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[13] *Monetize avatar items*, Roblox Creator Hub (2025), https://create.roblox.com/docs/monetize-avatar; Roblox, *Monetize avatar items*, archive.today webpage capture (Sep. 17, 2025), https://archive.is/2Ngdk.
[14] *Developer Exchange Terms of Use*, Roblox Legal Documents (Nov. 4, 2025), https://en.help.roblox.com/hc/en-us/articles/115005718246-Developer-Exchange-Terms-of-Use. As explained in further detail below, Roblox's Robux exchange rate is not fixed; *Developer Exchange Help and Information Page*, Roblox Legal Documents, https://en.help.roblox.com/hc/en-us/articles/13061189551124-Developer-Exchange-Help-and-Information-Page (last visited Feb. 20, 2026).
[15] Yubo Kou et al., " *The System is Made to Inherently Push Child Gambling in my Opinion": Child Safety, Monetization, and Moderation on Roblox,* 471 CHI '25: Proceedings of the 2025 CHI Conference on Human Factors in Computing System 1, 1-18 (2025), https://doi.org/10.1145/3706598.3713170.
[16] Criscillia Benford & Rachel Franz, *Buying to Belong: Youth and Virtual Assets in the Metaverse*, Fairplay, 36 (Feb. 2025), https://fairplayforkids.org/wp-content/uploads/2025/02/Buying-to-Belong.pdf [hereinafter *Buying to Belong*].

for Investigation, we outline the core issues with three interconnected aspects of Roblox: its **engagement-maximizing design features**, including scarcity marketing, visible inventories, lootboxes, and time-based rewards; its **complex virtual currency system**; and its **chat and communication features**. Alone and in combination, these three components capitalize on young users' developmental vulnerabilities, exploit their desire for authentic self-expression, monetize their lack of impulse control, and turn in-game purchasing power into a form of social status.[17] As a result, young users say they feel a constant pressure to keep up with their peers on the platform, and are thereby driven to buy and spend Robux in order to enjoy Roblox's experiences.[18] At the same time, the voice and text chat features that make the platform social repeatedly expose children to sexual content and harmful adults, resulting in sexual exploitation and abuse. Despite repeated warnings from advocates, including NCOSE, that its platform was not safe for children, Roblox only recently began making design changes in an attempt to prevent unknown adults from contacting minors. The insufficiency of these measures is discussed in Sections III and VI.

The substantial risks Roblox poses to children have begun to draw scrutiny across the country and the world. In the U.S., 80 child exploitation lawsuits against Roblox have been consolidated in federal court,[19] and the attorneys general of multiple states have filed lawsuits against the company.[20] A class action lawsuit has also been filed against Roblox in Canada for its manipulative designs that encourage spending and compulsive use.[21] Fairplay, NCOSE, and the above-signed organizations are urging the Federal Trade Commission to scrutinize Roblox's design features and marketing tactics under its own authority under Section 5 of the FTC Act. Specifically, we encourage the Commission to investigate:

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[17] *Id.*
[18] Buying to Belong, *supra* note 7, at 24-25.
[19] Diana Novak Jones, *Child sexual exploitation lawsuits against Robloz centralized in San Francisco,* Reuters (Dec. 12, 2025), https://www.reuters.com/legal/government/child-sexual-exploitation-lawsuits-against-roblox-centralized-san-francisco-2025-12-12/.
[20] AG Liz Murrill, *Louisiana Attorney General Liz Murrill files Child Protection lawsuit against popular game Roblox,* Louisiana Office of the Attorney General (XX), https://aglizmurrill.com/Article/322; https://www.kentucky.gov/Pages/Activity-stream.aspx?n=AttorneyGeneral&prId=1832; AG James Uthmeier, *Attorney General James Uthmeier Sues Roblox For Misrepresenting Platform's Safety,* Office of the Attorney General State of Florida (Dec. 11, 2025), https://www.myfloridalegal.com/newsrelease/attorney-general-james-uthmeier-sues-roblox-misrepresenting-platforms-safety; Jen Green, *Attorney General Brenna Bird Sues Roblox for Endangering Iowa Children,* State of Iowa Office of the Attorney General (Dec. 16, 2025), https://www.iowaattorneygeneral.gov/newsroom/attorney-general-brenna-bird-sues-roblox-for-endangering-iowa-children; Ken Paxton, *Attorney General Ken Paxton Sues Roblox for Putting Pixel Pedophiles and Profits Over the Safety of Texas Childre,* Ken Paxton Attorney General of Texas (Nov. 7, 2025), https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxton-sues-roblox-putting-pixel-pedophiles-and-profits-over-safety-texas.
[21] https://www.cbc.ca/player/play/video/9.6917069

- **Roblox's conduct in marketing virtual currencies and virtual assets to children as unfair in violation of Section 5 of the FTC Act.**
- **Roblox's use of engagement-maximizing design features as unfair in violation of Section 5 of the FTC Act.**
- **Roblox's representations about the platform's safety features and developmental appropriateness as deceptive in violation of Section 5 of the FTC Act.**

We also urge the Commission to investigate Roblox's compliance with COPPA. As described above, children are easily able to log on and begin using Roblox without any verifiable parental notice or consent. Under COPPA, this means that Roblox's use of those child users' personal information should be strictly limited. Any child who wants to use Roblox must create a username, which constitutes "personal information" under the COPPA Rule.[22] The Rule says an operator may only use a child's personal information without verifiable parental consent in limited scenarios listed in § 312.5(c). Roblox's updated Privacy and Cookie Policy says the company will delete personal information that is not needed for account setup.[23] A child's use of a social gaming platform necessarily generates a substantial amount of data that is presumably associated with their username. As with many online platforms, it is difficult to fully scrutinize Roblox's COPPA compliance without investigatory authority. We encourage the Commission to make the appropriate inquiries to ensure that Roblox is not using children's personal information outside of the limited exceptions outlined in the COPPA Rule without providing notice and obtaining verifiable consent.

This Request for Investigation will outline in detail Roblox's complex design features in Sections I-III. Sections IV-VI explain why these features are unfair and deceptive under Section 5 of the FTC Act.

[22] 16 C.F.R. § 312.2.
[23] Roblox, *Roblox is Updating our Roblox Privacy and Cookie Policy,* archive.today webpage capture (April 30, 2026), https://en.help.roblox.com/hc/en-us/articles/14663460303380-Roblox-is-Updating-our-Roblox-Privacy-and-Cookie-Policy; https://archive.is/CMU8n (last visited April 14, 2026).

Roblox's Problematic Design

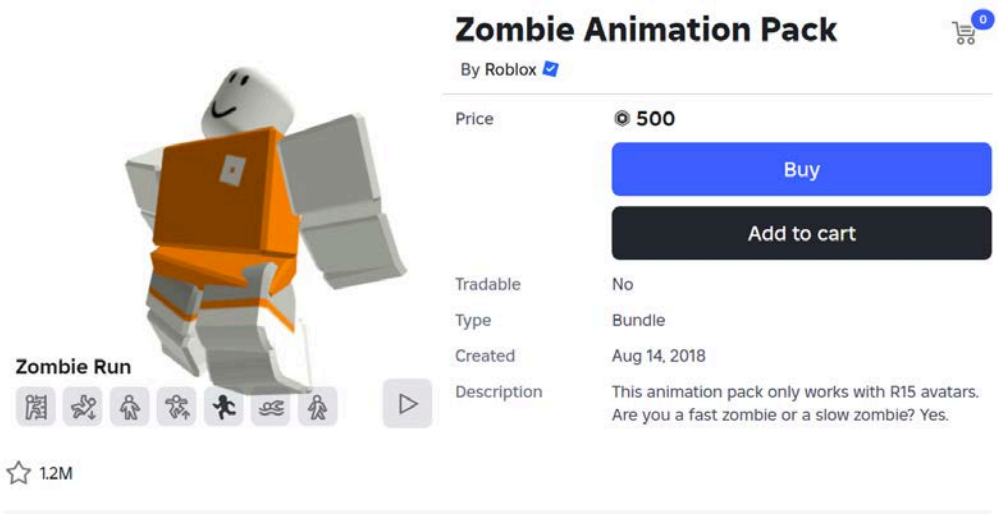
The claims that Fairplay and NCOSE put forth in this Request for Investigation are based on the many problematic features that are central to Roblox's design. In this section, we examine the platform's design features and virtual asset marketing techniques, virtual currency system, and voice and text chat features.

I. Roblox leverages sophisticated design features and marketing techniques to capitalize on child users' vulnerabilities.

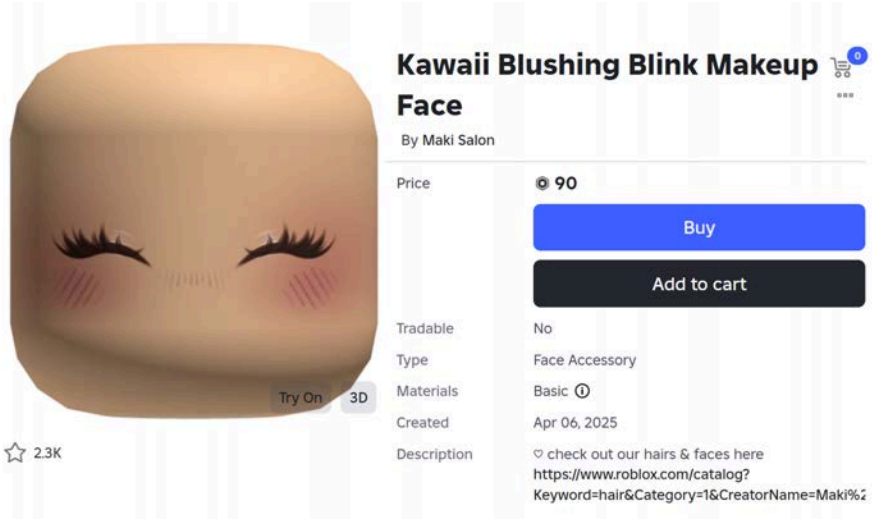
One of Roblox's most appealing features for young users — and the cornerstone of its business model — are virtual assets. This section describes how virtual assets are created, marketed, sold, and resold in Roblox and throughout the platform's experiences. Roblox drives virtual asset transactions through a range of sophisticated design and marketing techniques and capabilities: scarcity marketing, visible inventories, variable rewards, and time-based rewards. This section discusses each in turn. Virtual assets must be purchased with the platform's in-game currencies — either Roblox's Robux or a specific experience currency — which is discussed in detail in the next Section.

Virtual assets are digital items with distinct value or usage rights,[24] and in Roblox they include everything from clothing items and body parts that allow users to customize their avatars to power-ups and advantages that boost a user's gameplay. Roblox has its own Marketplace where users can purchase items that change how their avatar looks and moves, including "character bodies and heads, clothing, accessories, animations, and other cosmetic items."[25] Some of these virtual assets are created and sold by Roblox itself, but the vast majority are user-generated content made by third parties using the company's Creator Hub, including individual players, professional third-party Roblox developers, and major retail brands.

[24] Buying to Belong, *supra* note 7, at 63 (*citing* Marloes Valentina Stella, *The Metaverse Glossary: Everything You Ever Wanted to Know about the Metaverse*, Virtway (Jan. 26, 2022), https://www.beyondgames.biz/24444/the-metaverse-glossary-everything-you-ever-wanted-to-know-about-the-metaverse/)).
[25] *Monetize avatar items*, Roblox Creator Hub (2025), https://create.roblox.com/docs/monetize-avatar; Roblox, *Monetize avatar items*, archive.today webpage capture (Sep. 17, 2025), https://archive.is/2Ngdk.



A Roblox-sold animating pack in the Marketplace gives users the ability to move like a zombie for 500 Robux.



User Maki Salon offers an avatar customization item that imitates Kawaii-style makeup for 90 Robux.

There are millions of items available for sale in the Marketplace.[26]

The findings in Fairplay's *Buying to Belong: Youth and Virtual Assets in the Metaverse* report underscore the importance young users place on customizing their avatars with virtual assets. Focus group participants interviewed for that report said

[26] *Roblox Corporation 2025 Proxy Statement and 2024 Annual Report,* Roblox, 198 (May, 29, 2025), https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf.

they like using virtual assets to make their avatar reflect who they are: "As one of our 11-year-old participants explained, customizing an avatar to look 'like you normally do' is 'really cool' because it helps other players get to know the real you."[27] By contrast, participants also said that using a default avatar with no customizations makes players vulnerable to taunts about being a "default," "noob," or "bacon" (a term that refers to the default Roblox avatar's hair, which resembles bacon).[28]

Roblox uses a profit-sharing structure to incentivize users and developers to create and sell virtual assets in the Marketplace. Roblox receives 70% of the profits from Marketplace virtual asset sales, and the item developer receives 30%.[29] A user must be a Premium member (members who are subscribed to pay for a set quantity of Robux on a monthly basis) to upload and sell assets in the Marketplace.[30]

Developers can also sell virtual assets to users within their experiences.[31] These can include avatar clothing items, body parts, or emotes (avatar animations, such as dance moves, postures, or expressions), as well as power-ups and gameplay advantages specific to that experience. Almost always, these items are exclusive to a given experience, meaning a player can only use them when they are in that experience, and they are not available in other experiences on the platform. As in its regular Marketplace, Roblox incentivizes virtual asset sales through profit-sharing.[32] Roblox asserts that, on average, 67% of in-experience spending "supports or goes to" developers.[33]

Roblox provides developers with sophisticated tools to track sales and maximize profit in their experiences. For example, developers can use dynamic pricing and price maximization tools from Roblox in order to test and set "optimal" prices for their virtual products.[34] And just as Roblox's general Marketplace allows third parties to create and sell items, developers can turn on the ability for third parties to create, list, and sell user-generated items within their experiences. The user who creates a virtual asset in an

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[27] Buying to Belong, *supra* note 7, at 22.
[28] Buying to Belong, *supra* note 7, at 25.
[29] *Monetize avatar items*, Roblox Creator Hub (2025), https://create.roblox.com/docs/monetize-avatar; Roblox, *Monetize avatar items*, archive.today webpage capture (Sep. 17, 2025), https://archive.is/2Ngdk.
[30] *Marketplace Policy*, Roblox Creator Hub (2025), https://create.roblox.com/docs/marketplace/marketplace-policy.
[31] *Monetize your experiences*, Roblox Creator Hub (2025), https://create.roblox.com/docs/monetize-experiences.
[32] *Monetize avatar items*, Roblox Creator Hub (2025), https://create.roblox.com/docs/monetize-avatar; Roblox, *Monetize avatar items*, archive.today webpage capture (Sep. 17, 2025), https://archive.is/2Ngdk.
[33] *Monetize your experiences,* Roblox Creator Hub (2025), https://create.roblox.com/docs/monetize-experiences.
[34] *Check for dynamic pricing*, Roblox Creator Hub (2025), https://create.roblox.com/docs/production/monetization/price-optimization#check-for-dynamic-pricin.

experience receives 30% of the sale of the item, the developer of the experience receives 40%, and Roblox receives 30%.[35]

In addition to its overall Marketplace and pricing design mechanisms, Roblox uses — and empowers developers to use — sophisticated marketing tactics and design techniques to increase the allure of virtual items for its young users and encourage spending.

A. Scarcity Marketing

Roblox has built a number of scarcity marketing capabilities into the platform that increase demand and drive sales of virtual items. Both Roblox and developers can limit the amount of time a virtual asset is available, the quantity of a given virtual asset that is available for purchase, or both.

Limited-quantity items encourage young users to make purchases quickly, before a virtual asset "runs out." Limiting an item also gives it special meaning or value. Similarly, items only available for a limited time encourage both rapid purchases and returning to the platform frequently — sometimes multiple times per day — to avoid missing out on items. For example, the Seed Shop in the wildly popular experience Grow A Garden[36] refreshes every five minutes.[37] Some focus group participants shared that they check in-experience shops every time they refresh throughout the day.[38] In the words of a 14-year-old from one of the *Buying to Belong* focus groups:

> I find that when things are limited it makes the… like the rush about them, I guess, like the general excitement that they're there more intense. Because if something's not limited, people generally are just like, 'Okay, well, I don't need to buy this now. I can buy it whenever I want, if I decide to later.' But if it's limited, there's, like, a lot of pressure to get it now. Because what if it turns into a really valuable item in the future. What if you decide later on that you should have bought it and you can't? You know it's like there's this sort of, like, pressure to stay on top of, like, the, like, best items or whatever.[39]

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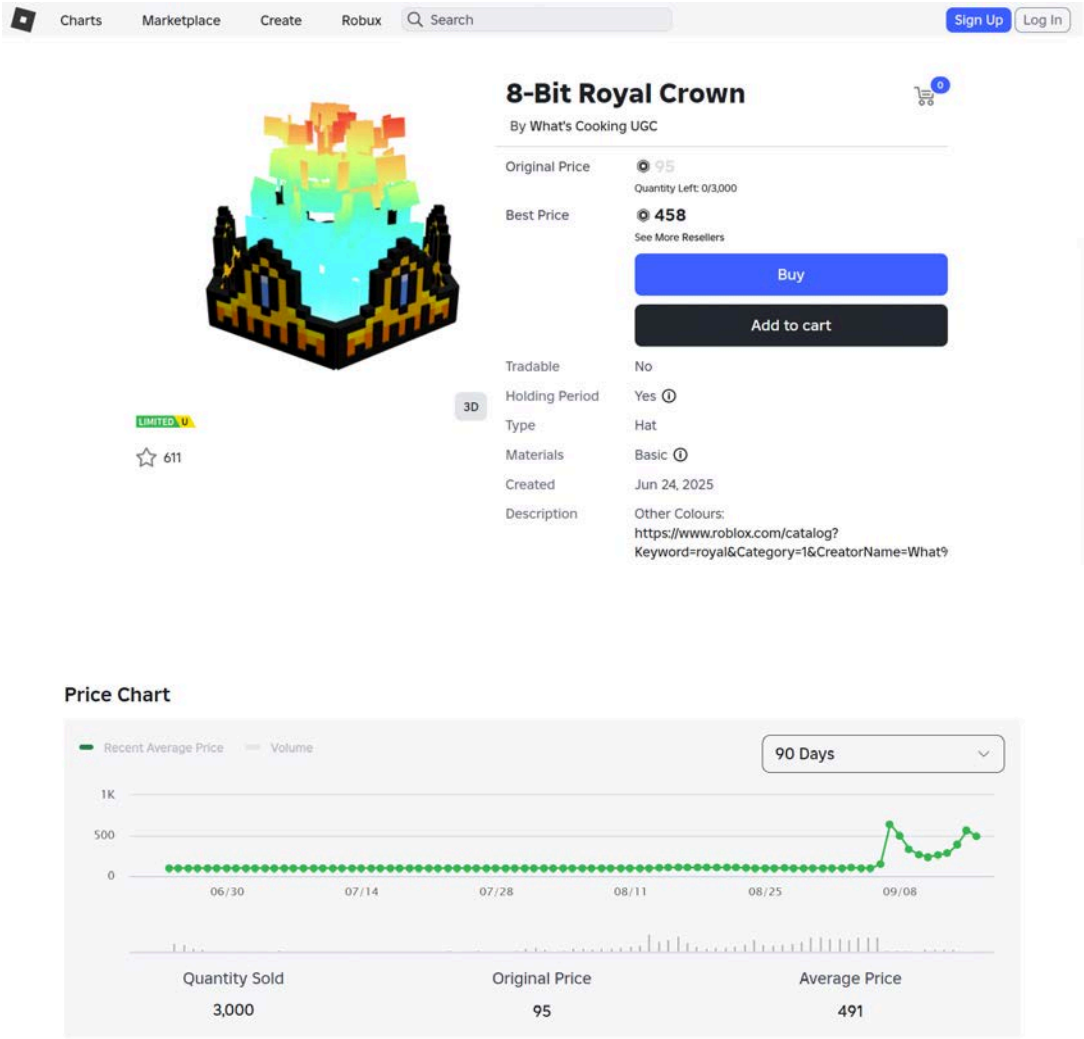
[35] *Monetize your experiences*, Roblox Creator Hub (2025), https://create.roblox.com/docs/en-us/monetize-avatar; *Marketplace fees and commissions*, Roblox Creator Hub (2025), https://create.roblox.com/docs/marketplace/marketplace-fees-and-commissions#commissions.
[36] Graham Fraser, *Grow a Garden: The surprise Roblox gaming hit,* BBC.com (Jun. 20, 2025), https://www.bbc.com/news/articles/cj4edkdxz2xo.
[37] *Seed Shop Grow a Garden Wiki,* Fandom, https://growagarden.fandom.com/wiki/Seed_Shop (last visited May 19, 2026).
[38] Buying to Belong, *supra* note 7, at 22-24.
[39] Buying to Belong, *supra* note 7, at 32.

As explained above, Roblox has also designed its Marketplace to allow for a robust resale market of limited virtual items, further encouraging young users to covet and collect items that are seen as particularly rare or valuable. For these items, the Marketplace shows users the original quantity that was sold, the quantity that is available from resellers, and the current best resale price. The Marketplace listing also provides the item's original price, average price, and price history over up to 180 days, further framing virtual assets as "investments" whose value fluctuates over time.



The Marketplace listing and price chart for a limited edition crown. Three thousand crowns were originally sold for 95 Robux each. At the time of this capture, the least expensive one available for resale cost 458 Robux. Roblox, *8-Bit Royal Crown*, archive.today webpage capture (Sep. 17, 2025) https://archive.is/8ccIW.

This strategy has been highly profitable for Roblox. After it launched its program for limited-edition user-generated items in April 2023, the company reported a 22%

increase in virtual currency purchases and a 15% increase in revenue over the same quarter in 2022.[40]

Many of Roblox's most popular experiences combine limited-quantity and limited-time items to drive sales. For example, in Grow a Garden, new seeds and other items are "restocked" every five minutes, while the "limited time shop" contains items that are only available for 24 hours or a few days. Countdown timers everywhere encourage players to make purchases while they can. Many of the items also indicate how many are "in stock," with those that are no longer available appearing with a "NO STOCK" label in large red letters.



The shop in Grow a Garden shows only two tomato seeds left in stock and no corn seeds. Both types of sides are listed as "rare." It also features a countdown timer to the next restock.

[40] Cole Watson, *Roblox posts 15% spike in Q2 revenue,* kidscreen (Aug. 9, 2023), https://kidscreen.com/2023/08/09/roblox-posts-15-spike-in-q2-revenue/.



Another part of the Grow a Garden store offers crates and "premium" rewards. In the lower left corner, a countdown timer indicates the current season int eh game will end in 20 days and 13 hours.

All of these design choices make purchases feel urgent and high stakes. In reality, the scarcity of these virtual assets is completely manufactured. Unlike physical products, there are no supply-side constraints in Roblox. There are no limitations on raw materials, energy, or manufacturing time. The quantities of items in experiences are *entirely* within the control of the seller, whether that seller is a user, developer, or Roblox itself. As discussed in more detail below, this false scarcity preys upon young users' fear of missing out (FOMO) in order to generate profit from items that have no real-world value.

B. Visible Inventories

Roblox maintains buying virtual items as a central component of its platform by making players' inventories of virtual assets visible to each other. This feature places added importance on the items that a player collects and styles their avatar with because they can be reviewed by other players at any time. By allowing children to investigate who owns what, Roblox takes advantage of their developmental proclivity for social comparison, which involves measuring their self-worth relative to others. As explained in *Buying to Belong*:

> Social comparison is an especially powerful force in online gaming platforms. Platforms are designed to encourage it through a variety of features that highlight players' achievements, status, and behaviors. These mechanisms fuel a feedback loop in which players assess themselves against their peers, increasing player motivation to engage in observational learning to improve and understand their social status. Positive comparisons, such as acquiring coveted in-game items or winning

> a timed challenge, can reinforce a sense of belonging and boost status. The reverse, however, is also potent. Negative comparisons can trigger feelings of inadequacy of exclusion, heightening players' vulnerability to peer pressure.[41]

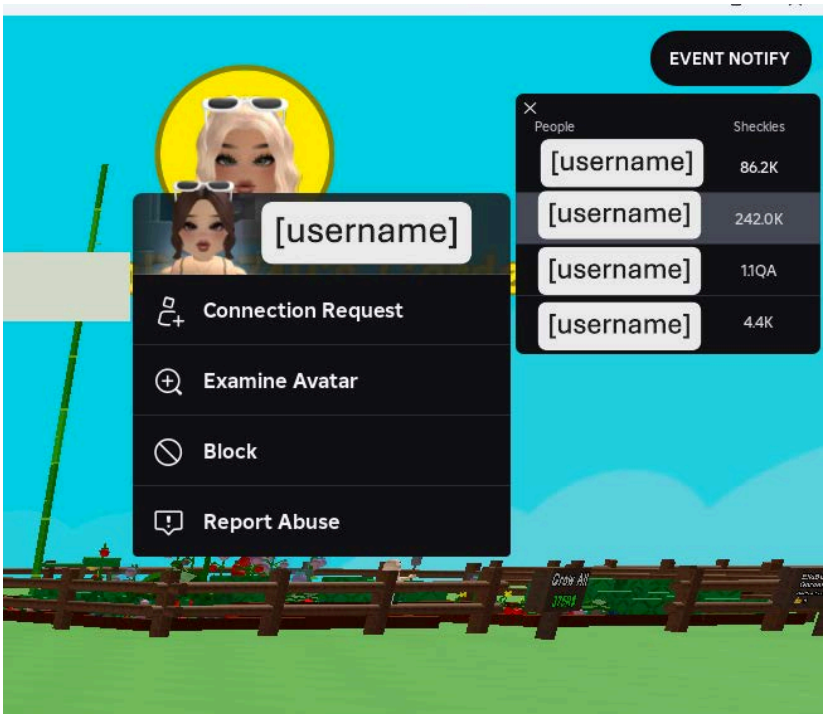
Visible inventories take advantage of these feedback loops of comparison and longing in order to sell more virtual assets.

Inspecting another player's Roblox avatar is easy. When a user enters an experience, a list of other players in that experience appears in the corner of the screen. A child can click on any of the usernames listed and select the option to examine that user's avatar.



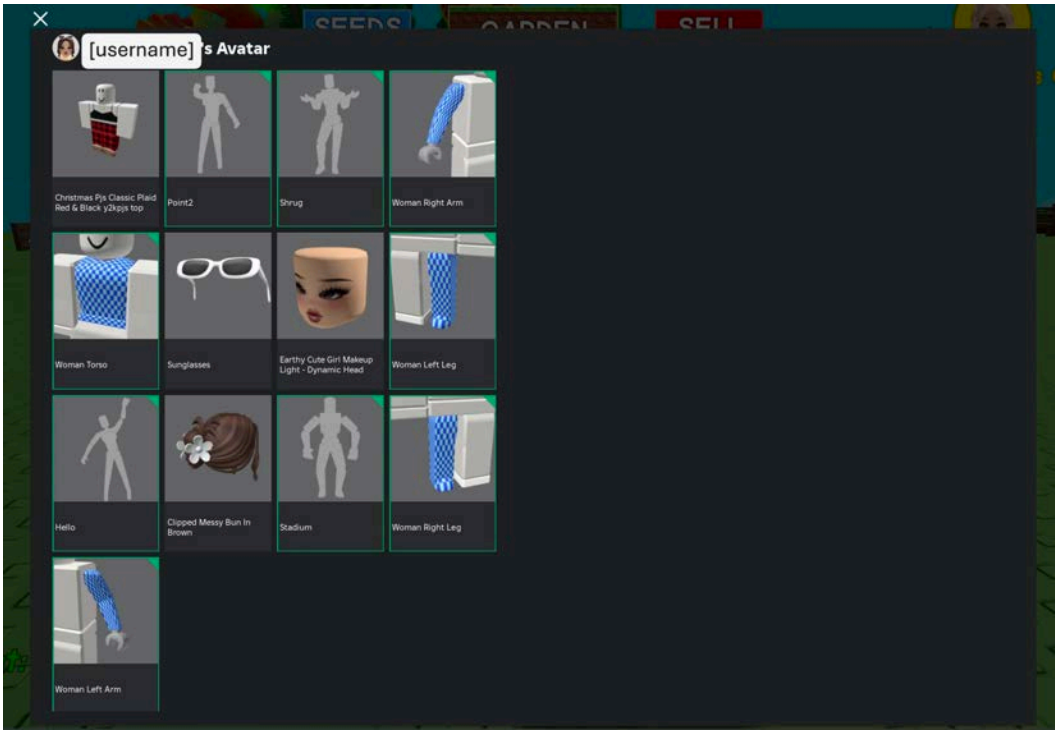
When a user enters an experience, a list of other users in the experience appears on the righthand side of the screen.

[41] Buying to Belong, *supra* note 7, at 16.

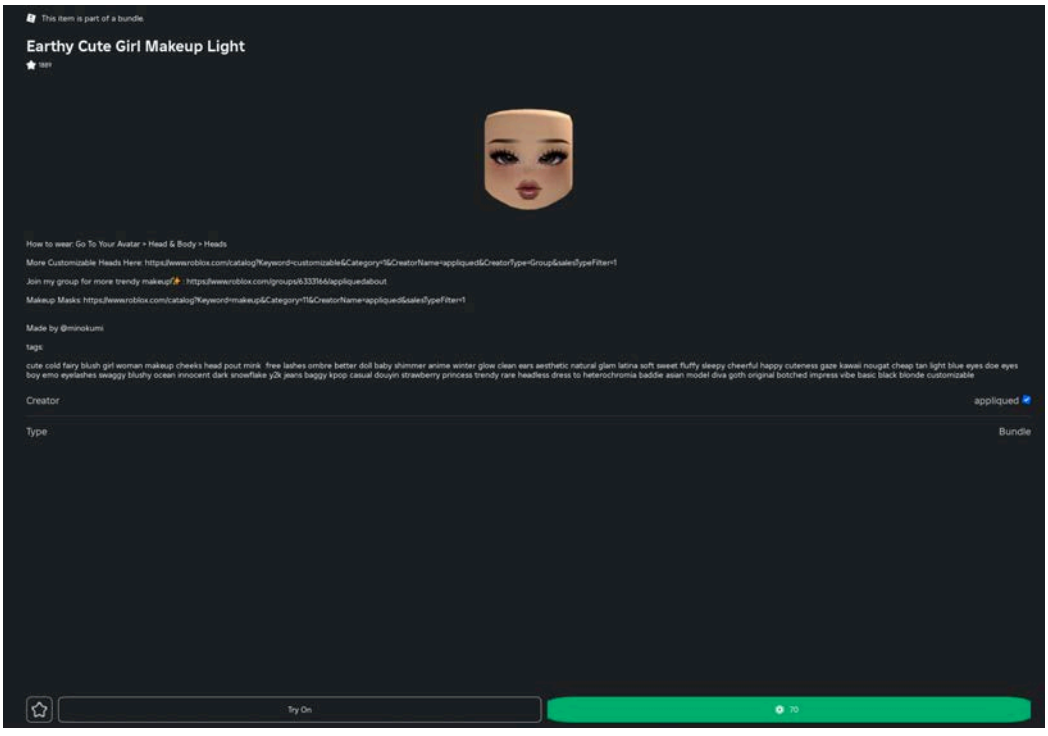


A user can then click on any of the names listed and receive a menu of options for engaging with that user further, including inspecting their avatar.

In the "Examine Avatar" window, the user can then see an inventory of all of the items the other player has used to customize their appearance, and they can click on each to see if they are available for sale in Roblox's Marketplace.

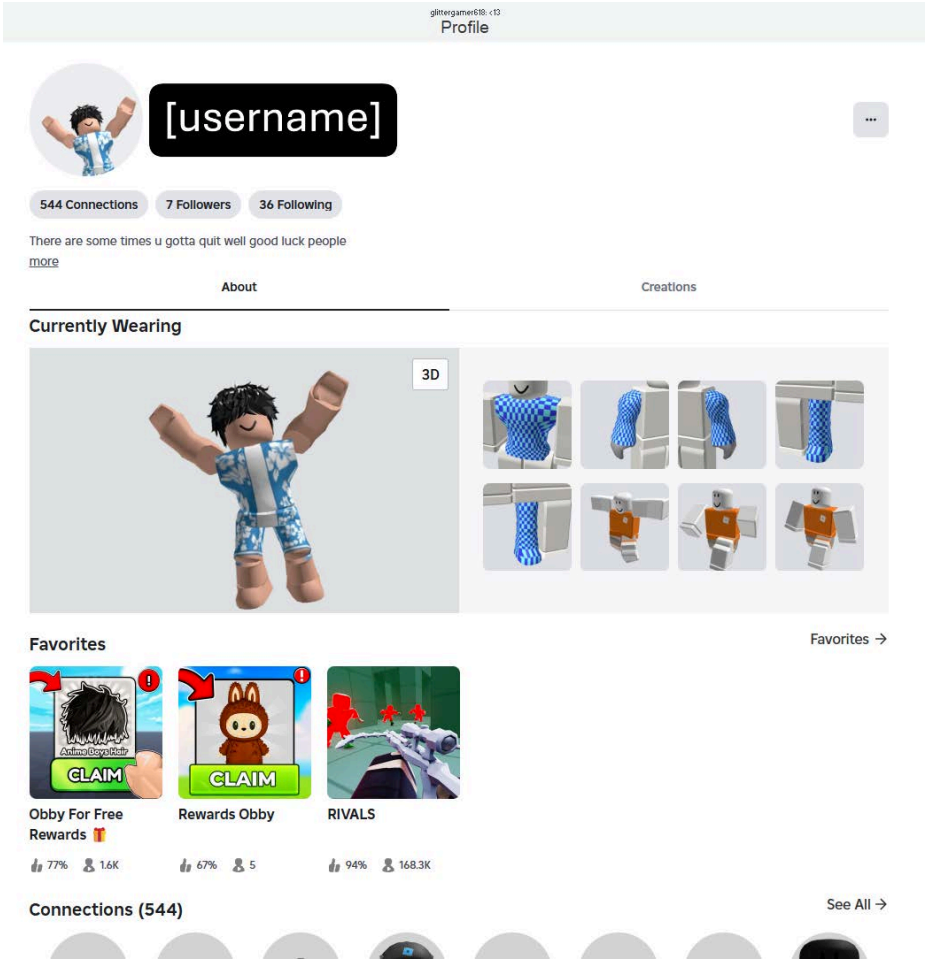


When a user inspects an avatar within an experience, they can see all of the virtual items that user has equipped, including clothing, makeup, hair styling, and emotes (animations).



A user can click on each individual item a user has equipped their avatar with in order to try it on or buy it for themselves.

On Roblox's main menu pages, users can also visit their connections' profiles to see what items their connection's avatar is wearing. The user can click on each individual item to purchase it.



Users can also inspect each other's avatars and virtual items by going to that user's profile on the Roblox home page.

These mechanisms allow users to confirm that another player is wearing a "genuine" high-value or rare item. A Fairplay researcher purchased the Korblox Deathspeaker bundle of avatar clothes for 17,000 Robux (over $200 USD).[42] Other Roblox players inspected the researcher's inventory to verify she was wearing the actual high-value Deathspeaker bundle and not an imitation before sharing compliments.[43]

[42] Exact price depends on the Robux conversion rate and purchase method at the time of purchase.
[43] Buying to Belong, *supra* note 7, at 25.



A user compliments a Fairplay researcher who is wearing a bundle of avatar clothes that cost over $200 USD in Robux to purchase.

Ultimately, Roblox's visible inventory design feature subjects players to constant scrutiny over what they own and how they have styled themselves. In this way, Roblox is different from the playground or a classroom, where a child facing ridicule for what they are wearing or how they look can physically separate themselves from bullies during the day and can go home after school. On Roblox, not even virtually "walking away" or logging off can prevent a player's connections from scrutinizing what they own and how they style themselves at any time.

C. Lootboxes and Other Variable Rewards

Variable reward design mechanisms are another common feature in Roblox experiences. A lootbox is a virtual "container" that contains one or more virtual items of varying value, rarity, or both.[44] A user cannot see the box's actual contents until they have purchased and "opened" the box. Roblox explicitly permits these gambling-like features, including lootboxes and wheels of chance, in its Terms of Service,[45] despite significant evidence that children do not understand the odds of receiving the marketed prizes.

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[44] Federal Trade Commission, *FTC Video Game Loot Box Workshop*, FTC (Aug. 2020), https://www.ftc.gov/system/files/documents/reports/staff-perspective-paper-loot-box-workshop/loot_box_workshop_staff_perspective.pdf.
[45] *Roblox Terms of Use*, Roblox Legal Documents (Nov. 4, 2025), https://en.help.roblox.com/hc/en-us/articles/115004647846-Roblox-Terms-of-Use.



The Merchant Shop in Blade Ball offers wheel spins and a "Silver Crate" lootbox, both of which are listed as limited-quantity items.

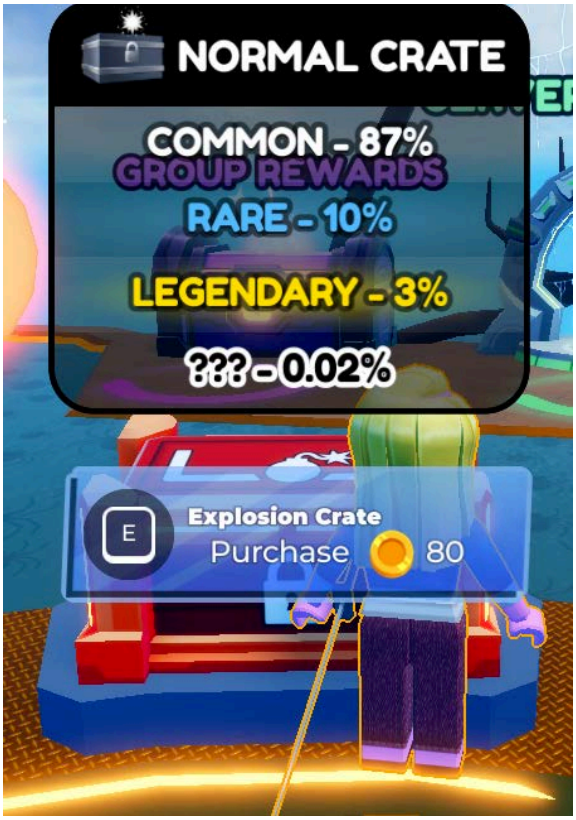
Roblox requires developers selling randomized items to disclose the "actual numerical odds" of what the user may receive before they purchase the randomized item.[46]

[46] *Virtual items policies*, Roblox Creator Hub (2025), https://create.roblox.com/docs/production/monetization/virtual-items; Roblox, *Virtual items policies*, archive.today webpage capture (Sep. 18, 2025), https://archive.is/BrYYb.

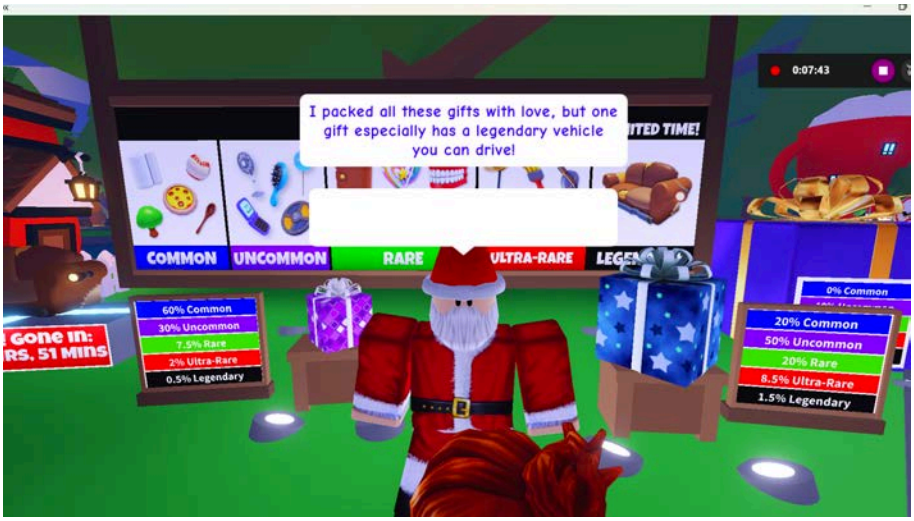


In My Littlest Petshop, players are prompted to open their first "pod" to begin playing. The screen displays the odds that the pod will contain a given animal in small, blue font.

In many experiences, the lootbox rewards that are most powerful for gameplay or appealing to users are the items a player has the lowest odds of receiving. These items often have highly appealing labels, such as "rare," "ultra-rare," or "legendary."



A crate in Blade Ball labels the rarest possible lootbox item, at 0.02% odds, as "???"



In AdoptMe, Santa says that one of his wrapped "gift" lootboxes has a special "legendary" item inside.

A similar feature employed by many Roblox developers are wheels of chance. These features require the user to first purchase the opportunity to spin the wheel or similar mechanism before actually initiating the spin and receiving a randomized

reward (much like a slot machine). Wheels can be particularly deceptive because they may appear to offer the player an equal chance at a number of rewards, while in reality the odds of receiving each item on the wheel vary wildly.



A wheel in Blade Ball shows the available rewards in six equal-sized pieces.





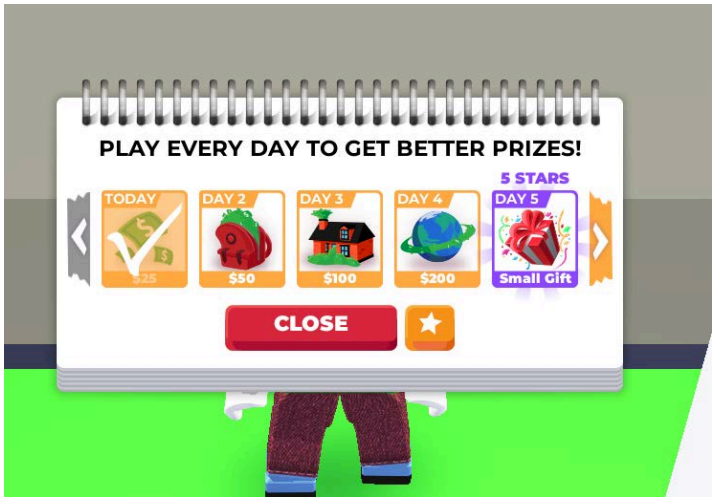
Clicking on the small "Odds" button reveals that the odds of receiving a given item vary dramatically: A player only has a 1% chance of receiving a Nebula Shard blade or a 2% chance of receiving a Rapture blade, but those "slices" of the prize wheel are an equal size to the coin prizes with much higher odds.

All of Roblox's variable reward mechanisms are unfair for children. They do not have the basic math or executive function skills to appreciate the complex odds of opening a given item. And as explored in the next Section, layers of virtual currency and exchange rates make it nearly impossible for an adult, let alone a child, to understand what an individual loot box truly costs. Despite this, variable rewards are heavily marketed to children across Roblox experiences, using exciting offers of special prizes, bright graphics, and promotional discounts to drive purchases. We explore these issues as a violation of Section 5 of the FTC Act in Section V, below.

D. Time-Based Rewards

Roblox experiences also frequently offer players rewards for time spent, including rewards for daily log-ins or for spending a specified amount of time in the experience. These design choices encourage children to spend longer periods of time on the platform and to return to it more often.

Many Roblox experiences offer children rewards for returning every day. These offers and an initial prize frequently appear as soon as a player enters the experience. Some, but not all, are based on the number of consecutive days a player logs into the experience, and the rewards increase in value as the player's number of visits increases.

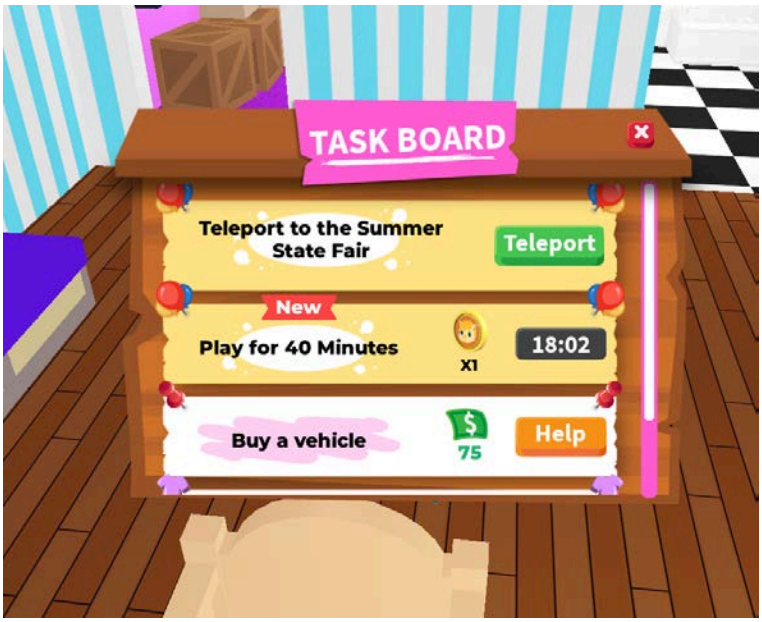


Welcome to Bloxburg offers players prizes of increasing value for visiting for consecutive days.



Blade Ball offers users rewards for both the total number of days they visit the experience and consecutive logins.

Developers also offer players rewards in exchange for spending a specified amount of time in an experience on a given day. These offers are presented with countdown timers and entice young players to stay in an experience longer.



A "Task Board" in AdoptMe offers players a special coin if they play for 40 minutes.

As described in more detail in Section V, below, these mechanisms are highly effective at leveraging children's developmental sensitivities. By making items visibly rare or limited, they activate children's lack of impulse control, FOMO (fear of missing out), and loss aversion.

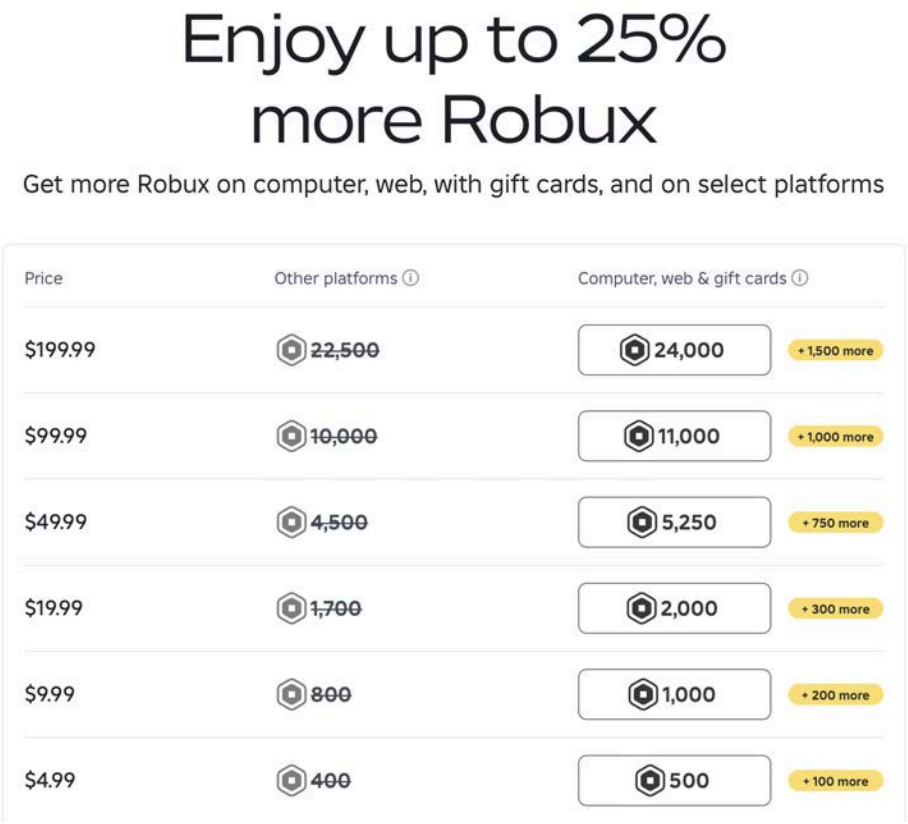
II. Roblox's Complex Virtual Currency System

Children purchase the virtual assets that drive much of Roblox gameplay by using the platform's in-game virtual currency, Robux. Players on Roblox are not able to use fiat currency to purchase the virtual assets that are designed to make the platform fun and compelling. Instead, they use fiat currency to buy Robux, which they can then use to purchase a variety of virtual assets. Players can use Robux in the central marketplace of Roblox to customize their avatars with skins, outfits, animations, and accessories. These virtual assets are typically available to users in any experience they enter. Their overall avatar styling with virtual items from the Marketplace dictates how the user looks in most experiences; typically, they do not have new avatars for each experience. But within games and experiences, players can use Robux to buy an almost endless variety of weapons, skills and abilities, powerups, animations, or virtual effects. Almost always, these are in-experience purchases that are only usable within that specific game or world; they cannot be carried to another experience. As discussed in greater detail below, Robux are also used to acquire secondary and tertiary in-game currencies to make many of these in-experience purchases, further complicating this system.

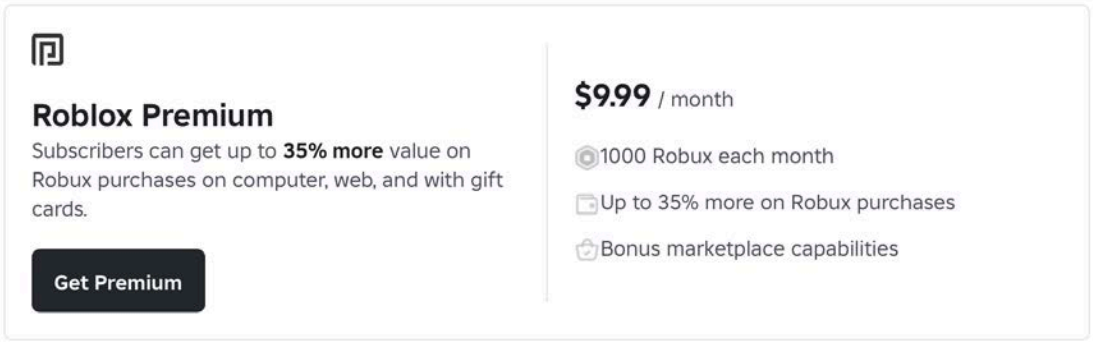
A. Roblox's Primary Currency, Robux

In order to participate in Roblox's in-game economy, players must navigate a complex system of fluctuating conversion rates and bundled pricing. These confusing purchase mechanisms are designed to simultaneously obscure and increase the amount of real-world money players are spending.

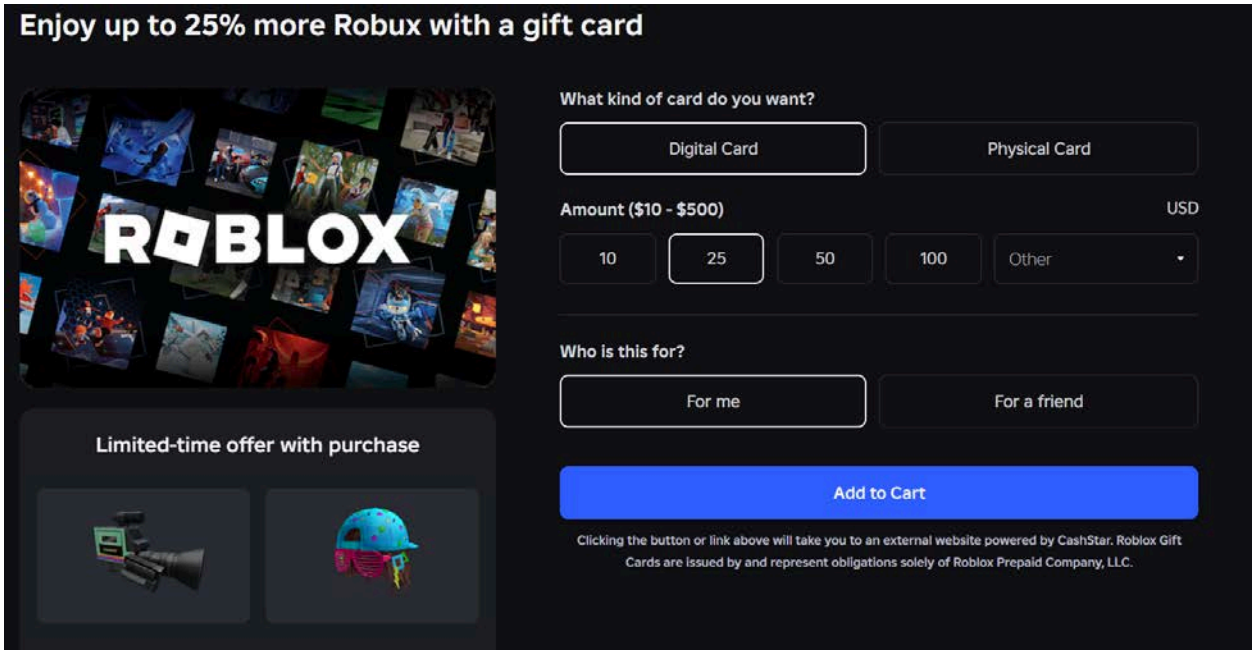
The simplest way for a player to acquire Robux is to purchase them by navigating to the Robux tab of the Roblox home screen, which can be accessed through any of the consoles or devices players use to access the platform. Players are also quickly directed to the Robux purchase page through pop-up windows each time they attempt to buy virtual assets within games and experiences. During this purchase process, the value of Robux (as compared to real-world money) continuously fluctuates.



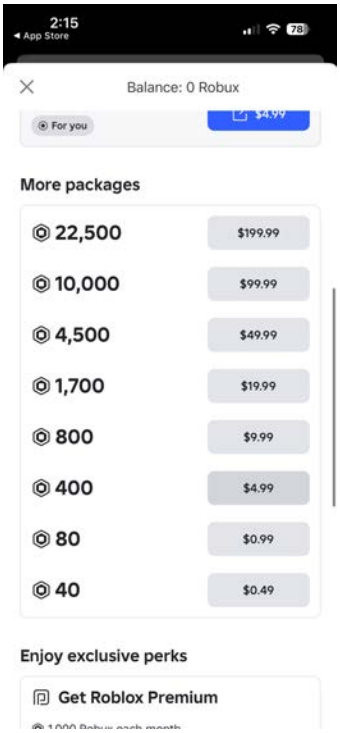
Prompt to purchase varying bundles of Robux. This screen can be launched from the home screen via the Robux icon, as well as from games and experiences when attempting to purchase virtual items with insufficient Robux in the user's account.



A prompt encourages users to sign up for Roblox Premium, a monthly recurring subscription of 1,000 Robux for $9.99.



Roblox advertises that users can exchange for up to 25% more Robux per Dollar using gift cards.



When purchasing on mobile and using Apple Pay, Robux are exchanged for a lesser rate per dollar than when using a web browser or computer.

The exchange rate for USD to Robux fluctuates widely based on a number of factors. Players can receive more Robux per dollar by purchasing larger bundles of currency. The rate also changes when a player uses a Roblox gift card rather than a traditional payment method (typically, the gift card exchange rate is more favorable for players).[47] Third, it varies depending on whether a player makes the purchase on a console, computer, or mobile device (typically, the console or computer rates are more favorable). And last, players can receive more Robux per dollar spent if they sign up for "Roblox Premium," which is a recurring monthly Robux subscription.

Players can also earn Robux by selling or trading virtual items in Roblox's Marketplace.[48] Players can do this by directly selling skins, avatar customizations, or accessories to other players. Or, they can become developers, allowing them to create, build, and sell virtual items within their own games and experiences. As explained above, Roblox incentivizes players to work as developers by allowing them to cash out Robux for fiat currency once they acquire a certain minimum amount.

Although users may expend significant money and/or time to acquire Robux, they are not afforded the rights and protections consumers normally enjoy when dealing in real-world currency.[49] That's because when players purchase or earn Robux, they actually acquire a "limited, non-transferable, revocable license" with "no equivalent value in real currency."[50] For example, where consumers using fiat currencies have legal protections from fraud, unauthorized transactions, and cyber threats, players using Robux are generally left to Roblox's buyer beware approach to virtual transactions on its platform.[51] Despite the massive amount of real money being converted into Robux ($2.64 billion USD in the first half of 2025 alone),[52] Roblox states that Robux "are not a substitute for real currency, do not earn interest, and have no equivalent value in real currency."[53] Roblox explicitly retains the right to terminate a player's account, and to "modify, revoke, or terminate" a player's license to access or use his or her Robux

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[47] *Roblox Gift Cards,* Roblox, https://www.roblox.com/giftcards-us (last visited Feb. 20, 2026).
[48] *Trading System,* Creating on Roblox, https://en.help.roblox.com/hc/en-us/articles/203313310-Trading-System (last visited Feb. 20, 2026), (as with selling virtual items in the Marketplace, players must have a Roblox Premium membership to trade virtual assets).
[49] *Insert Coin How the gaming industry exploits consumers using loot boxes,* Norwegian Consumer Council, 5 (May, 31, 2022), https://storage02.forbrukerradet.no/media/2022/05/2022-05-31-insert-coin-publish.pdf. [hereinafter *Insert Coin*].
[50] *See Roblox Terms of Use*, Roblox Legal Documents (Jan. 7, 2026), https://en.help.roblox.com/hc/en-us/articles/115004647846-Roblox-Terms-of-Use#user-terms
[51] *Banking in video games and virtual worlds*, Consumer Financial Protection Bureau (Oct. 24, 2024), https://www.consumerfinance.gov/data-research/research-reports/issue-spotlight-video-games/.
[52] *Roblox User and Growth Stats You Need to Know,* Backlinko (Jan. 23, 2026), https://backlinko.com/roblox-users.
[53] *Roblox Term of Use*, Roblox Legal Documents (Nov. 4, 2025), https://en.help.roblox.com/hc/en-us/articles/115004647846-Roblox-Terms-of-Use.

"without notice, payment, or liability."[54] Roblox is also not required to provide refunds for money spent on Robux, or otherwise allow players to convert their Robux back into real-world currency.

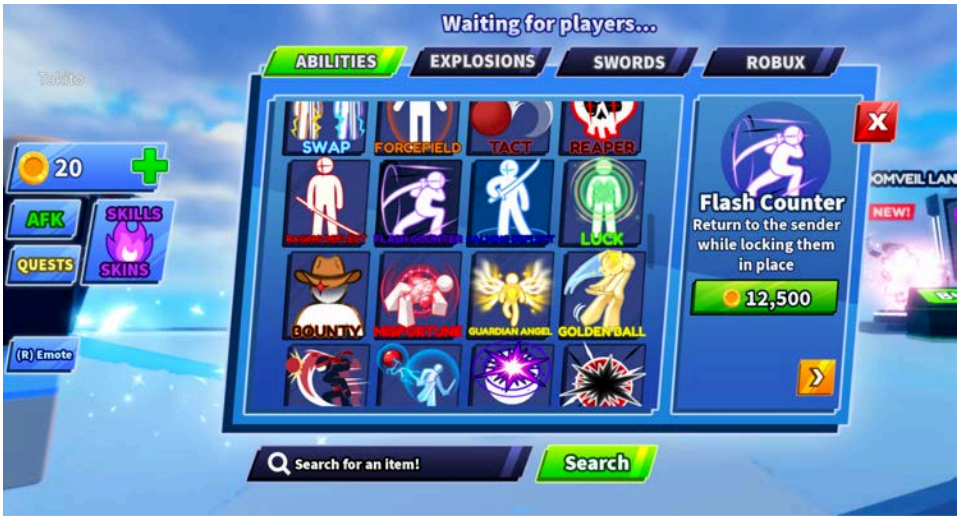
B. Layered Currencies in Roblox Experiences

By pushing young users to make purchases through a complex system of layered virtual currencies, Roblox is able to abstract, obscure, and wildly inflate the true cost of in-game items. As mentioned above, Roblox allows developers to create and offer secondary currencies that players can acquire by exchanging Robux. These layered currencies are used to buy virtual items within specific experiences. For example, in the popular Roblox game Blade Ball, players compete in multi-player battles using a variety of swords, animated explosions, and abilities. Young players are highly incentivized to obtain these virtual items because they are an important status symbol and can provide a playing advantage within the game.[55] While some virtual items in Blade Ball can be purchased with Robux directly, many items require a player to convert their Robux to "Coins."



A prompt to use Robux to purchase the secondary in-game currency Coins within the Roblox game Blade Ball.

[54] *Id.*
[55] Buying to Belong, *supra* note 7, at 16.



A prompt to use the secondary in-game currency Coins to purchase virtual items in the Roblox game Blade Ball.

Developers can take things further, continuing to layer in-experience currencies. Blade Ball also sells special items to players using seasonal tertiary currencies in addition to Coins. For example, in the summer of 2025, players were able to earn or purchase "Starfish," an additional layered currency offered through a seasonal promotion. Starfish could be purchased with Coins, which are earned through gameplay or are purchased with Robux. Players then use Starfish to purchase limited-edition items, buy spins and raffle entries, or earn bonuses through converting them back into Coins. Players can also circumvent the process of obtaining Starfish by purchasing a "Premium Pass," which unlocks rewards, challenges, and quests. Once the current seasonal promotion ends, players will lose access to the Starfish they have acquired or purchased, and a new seasonal promotion will begin. In total, Blade Ball has issued at least 45 different seasonal currencies to date.[56]

[56] *Blade Wiki Ball,* Fandom, https://Blade Ball.fandom.com/wiki/Currencies (last visited Feb. 20, 2026).



A prompt to use Robux to purchase the tertiary, seasonal currency Starfish within the Roblox game Blade Ball.



A prompt to purchase the secondary currency Coins using the tertiary currency Starfish within the Roblox game Blade Ball.



A prompt to purchase a Season Pass within the Roblox game Blade Ball. This season pass allows players to acquire the tertiary currency Starfish and related bonuses without needing to complete in-game tasks.

Each layer of virtual currency further abstracts the true cost of any given item in fiat currency. As noted above, the exact value of Robux can change depending on when and how it is purchased. That value is further obscured when players are forced to make purchases with layered currencies. That's because it's nearly impossible to calculate the true cost of a virtual item when a player must convert dollars to Robux and Robux to a layered currency, all with variable exchange rates.

The obfuscation of real-world costs is most acute when players purchase lootboxes or other variable reward mechanisms described in the previous Section. This is because variable rewards combine the obfuscation of virtual currencies with complex probabilities mathematics. As a result, calculating the true cost of buying enough of a given lootbox in order to have a high probability of receiving an advertised rare item is exceedingly difficult for an adult, let alone a child.

As an illustration, Blade Ball heavily markets lootboxes called "crates" to players with the possibility of obtaining high-value abilities or "Sword Skins."



Premium and standard crates available for purchase in the Roblox experience Blade Ball.



The available prizes displayed within a crate in the Roblox experience Blade Ball. This crate is available for purchase using a tertiary, seasonal currency called Starfish.

If a user wants to figure out the real-world cost, from dollars to acquisition, of being almost guaranteed to obtain a specific virtual item from a crate in Blade Ball, they would need to follow these steps:

1) Determine the per dollar value of their Robux by dividing the total Robux they have by the amount of USD they spent to acquire them. Remember, there is no set value for Robux, as the exchange rate changes depending on how and when a player's Robux were purchased.
2) Determine the per Robux value of Blade Ball Coins by dividing the number of Coins purchased by the amount of Robux spent to acquire them. Again,

this value will change depending on when and how a player purchased their Coins, and the amount of Coins the player earned through gameplay rather than through purchases.[57]

3) Determine the per dollar value of Coins by multiplying the per Robux value of Coins by the per dollar value of Robux at the time the Robux were purchased.
4) Translate the listed odds of obtaining the desired item from the required crate into the actual number of crates the player would need to purchase in order to most likely win that item. There is no number of crate purchases that 100% guarantees the player will win their desired item, because each crate purchase is an independent probabilistic event. So, in order to properly understand how many crates the player would need to purchase in order to *almost* certainly win the item (i.e., have at least a 99% chance), that player would need to make a probability graph using geometric distribution. This process can approximate the probability of at least one successful crate (giving the desired item) within a specific number of crate purchases. For example, if the desired virtual item has 20% listed odds, the player would need to purchase that crate approximately 21 times in order to have a 99% chance of winning their desired item.[58] In practice, this means the player could win that item on the first attempt, but could also *not* win that item even after 21 attempts, making it incredibly difficult for that player to calculate the potential cost of obtaining his or her desired item.

[57] Players can also earn Coins through gameplay, but the amount of earned currency in experiences in Roblox is typically designed to be insufficient for a player to purchase what they wish, as described below. For the purposes of this example, we will assume our hypothetical player is buying all of their Coins.

[58] Calculating this probability graph for a desired item with X odds requires the following formula: "$P(X = x) = p \cdot q(x - 1)$, $x = 1, 2, 3, \ldots$" where x is the number of crates up to the first success that you are trying to find the probability for, p is the probability of success for one Crate, and $q = 1 - p$ is the probability of a failure for one Crate. *See* Rachel Webb, *5:3 Geometric Distributions*, LibreTexts Statistics (Mar. 12, 2023), https://stats.libretexts.org/Bookshelves/Introductory_Statistics/Mostly_Harmless_Statistics_(Webb)/05%3A_Discrete_Probability_Distributions/5.03%3A_Geometric_Distributions (note that this recitation is not meant to be a complete and accurate explanation of probability theory. Rather, it is meant to be a simplified illustration of the complexity required for a child to understand the true cost of purchasing a virtual item through a crate or lootbox).



A user only has a 0.8% chance of opening the top reward in this Blade Ball premium crate.

5) Multiply the minimum number of crates potentially required to obtain the desired virtual item by the number of Coins required to purchase one crate. This determines the total number of Coins required to most likely obtain the item.
6) Divide the total Coins required to obtain the desired item by the fluctuating per dollar cost of 1 Coin as calculated above.

This process far exceeds children's mathematical abilities (as a reminder, Roblox's Terms of Service permits children as young as 5 to register an account), which are described in more detail in Section IVC, below. This example does not even factor in tertiary layers of currencies (as the above example only includes one layer of additional currency, Coins) or the minimum available bundle of Robux available at a given time. As such, it is nearly impossible for young users to know what a desired virtual item actually costs at any given time. This impedes young users from making informed decisions about their purchases and substantially increases their risk of financial harm.

C. Bundled Pricing for Virtual Currencies

Roblox also uses virtual currencies to manipulate young players into spending money by instigating sunk-cost pressure through bundled pricing and play-to-earn schemes. As explained above, players in Roblox are not able to choose any specific amount of Robux to purchase at any given time. Rather, they must choose between different Robux bundles with different exchange rates that become more favorable the more Robux are purchased. As a result, when a young player wants to purchase a

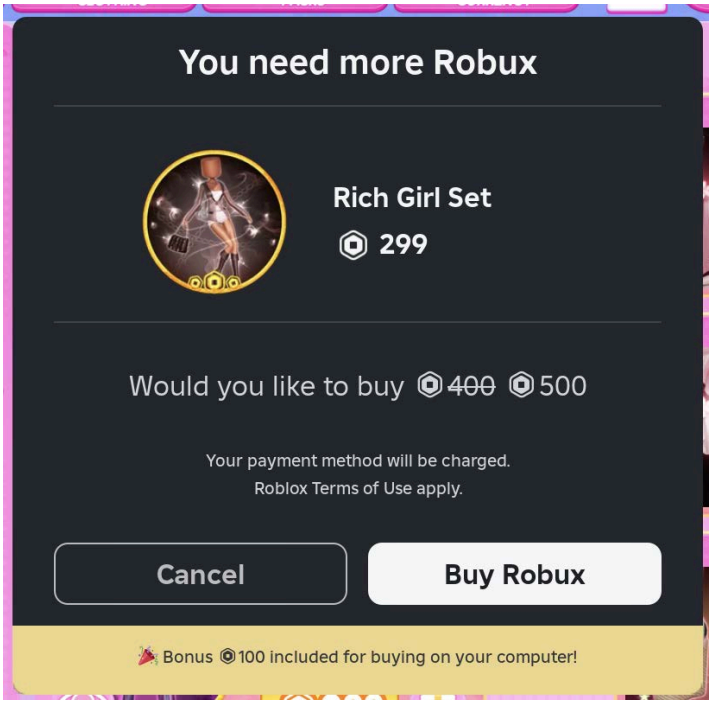
particular virtual item, they often *must* purchase more Robux than are required for that transaction. The existence of that leftover virtual currency creates pressure on children to keep buying more Robux so they do not lose the "value" of the leftover quantity they already paid for.[59]

For example, in the popular experience Dress to Impress, players compete by dressing up a model avatar using free or purchased virtual items to display on a runway stage and rating each other's looks. Most often, those rated the highest wear purchased, limited outfits, makeup, and accessories.



Prompt to purchase a virtual clothing set using Robux in the experience Dress to Impress.

[59] Buying to Belong, *supra* note 7, at 27-28 ("This is the sunk cost fallacy, a decision-making bias in which we prefer to persist in a course of action because we have invested in it even when we know that abandoning that course of action would be beneficial").



Prompt to purchase a bundle of 500 Robux in order to purchase a virtual item that only costs 299 Robux within the Roblox game Dress to Impress.

If a player wants to purchase a "Rich Girl Set" from the game's store, they would need 299 Robux. But because Robux can only be purchased in bundles of 500 or more, they actually need to purchase 500 Robux for $4.99. After using these Robux to purchase the Rich Girl Set, they would have 201 Robux left over in their account. This creates a pressure to spend those remaining Robux or risk losing the value of nearly half of their purchase. When they go to use those remaining 201 Robux, the cycle is likely to continue: buying a second, similarly priced set would mean purchasing at least another 500 Robux bundle.

This pressure is compounded when an experience has layered currencies. If our hypothetical Dress to Impress player decides to use their leftover Robux to purchase another item, such as a pair of Skull Thigh-High Boots, they will need $1,500 in the game's secondary currency, which is called "Cash." But this secondary currency can itself only be purchased in bundles, and their remaining 201 in Robux is not enough to cover the cost. So, they must purchase another bundle of 500 Robux in order to acquire a bundle of $3,500 in Cash. After using Cash to buy the Skull Thigh-High Boots, they will have 100 Robux left over in their account, along with $2,000 in Cash, and the cycle of sunk-cost pressure will repeat. This process — structuring bundled purchases in ways that leave players with a small amount of virtual currency left over after acquiring a

desired virtual asset — is present in many of Roblox's most popular games and experiences.[60]

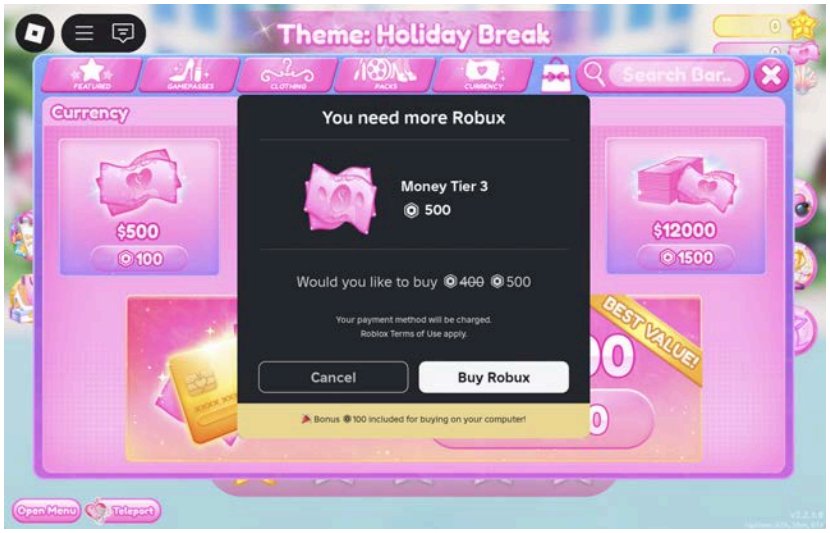


Virtual items listed within the Roblox game Dress to Impress, which can be purchased using the game's secondary currency, Cash. Cash can only be purchased with Robux in bundles.



Cash, the secondary currency in Dress to Impress, Cash, can be purchased in bundles.

[60] *See, e.g.*, *Blade Wiki Ball,* Fandom, https://bladeball.fandom.com/wiki/Currencies (last visited Feb. 20, 2026).



Prompt showing that purchasing bundles of currency is required in multiple, layered transactions. This image shows the need to purchase a bundle of Robux in order to then purchase a bundle of Cash in Dress to Impress.

In addition, Roblox instigates sunk-cost pressure in young users even when they do not spend any money on Robux. As explained above, many Roblox developers utilize some form of layered currency within their games and experiences. These layered currencies are often rewarded to players for spending time in a game, completing specific tasks, or maintaining streaks. However, when players earn layered currencies through game play, it is usually not enough to purchase the most popular virtual items available. Actually acquiring a sufficient amount of currency to purchase desired virtual items solely through gameplay is often exceedingly time-consuming and difficult. As a result, young players enter into an endless cycle where they are highly incentivized to use Robux to purchase in-game currencies, or else risk feeling like they have wasted the in-game currency they earned through gameplay. In Blade Ball, this process begins almost immediately upon entering the game, as the secondary currency "Coins" and tertiary currency "Starfish" start automatically accumulating in a player's account as "free rewards." This similarly plays on a user's desire to avoid sunk costs, but applies to the lost time and effort a player has put into a game, rather than the lost money they may have put into purchasing Robux.



Prompt to claim free rewards of the tertiary currency "Starfish" based on the amount of time spent playing the Roblox game Blade Ball. These rewards begin to accumulate as soon as a user begins playing the game, but often require consistent game play in order for a user to keep accruing them. Blade Ball's time-based reward trackers often time out after about 20 minutes, discouraging players from taking breaks.



Prompt showing rewards of the tertiary currency "Starfish" based on accumulating streaks for the number of successive days playing the Roblox game Blade Ball.



Prompt showing rewards for completing certain quests in the Roblox game Blade Ball. Completing quests gives players the chance to earn the secondary currency Coins.

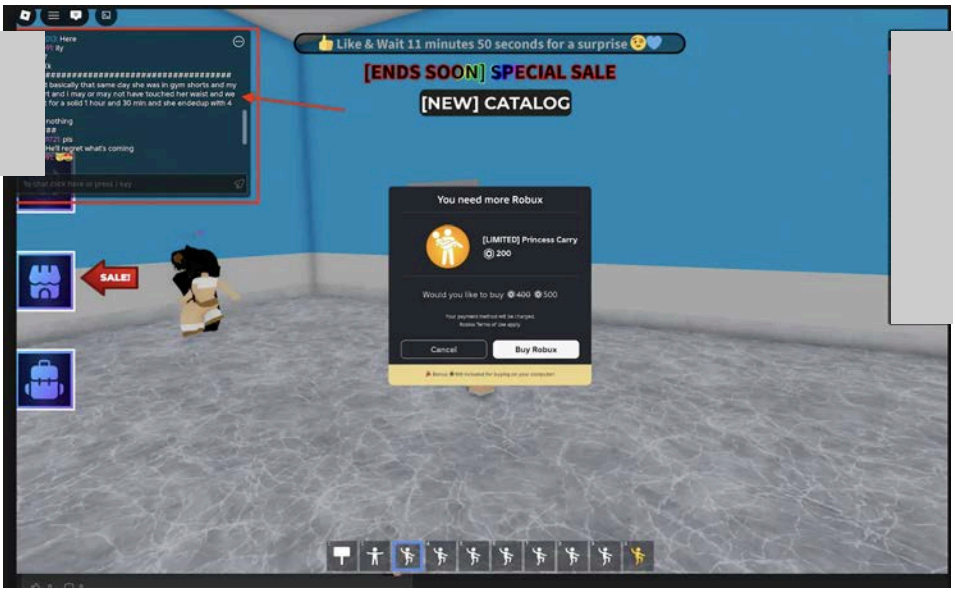
Roblox designs its platform to put immense pressure on young users to purchase an endless array of avatar customizations, weapons, skills, abilities, powerups, animations, and virtual effects. In doing so, Roblox forces young users to participate in its predatory virtual economy. By requiring users to make purchases through Robux and other layered currencies, Roblox is able to abstract, obscure, and wildly inflate the true cost of in-game items, and it is able to further instigate spending through bundled pricing and play-to-earn schemes.

III. Chat Features and Communication on Roblox

Roblox's appeal for children is driven not only by game features like lootboxes and its Marketplace of virtual assets, but also by the social features that allow children to interact with other players in real time. These features, including both text and voice chat capabilities, are a source of substantial harm to children, facilitating predation and abuse by enabling adult contact with minors. These harms have persisted on Roblox for years, and recent changes have not eliminated opportunities for adult-minor contact.

We will first describe the chat functions that exist in Roblox in general before explaining which features the platform has recently attempted to age-limit and how

those limitations fail. When a user logs into their Roblox home screen, they can communicate with users through the "Party" function, or by going to their "Connections" and selecting someone to chat with. In addition, when users enter experiences, there is also a chat box featured on the screen, which shows a running feed of text chats from all users who are in a given experience at a given time (which we refer to as "experience chats").



Experience chats appear in the upper left corner of a user's screen while inside a Roblox experience. The chat dialog box shows chat inputs from all other users in the experience.

Users can use the experience chat to send each other direct messages, a feature Roblox calls "whispers."[61] In addition, users can create group chats with up to five other users they are connected with, called "party" chats, which can be accessed in experiences or in the Party tab on the home screen.[62]

In recent months, Roblox has implemented an age verification process that it says will limit children's communication to players in similar age groups. It is also promoting parental control features that it says help parents of children under 13 limit their communications to approved contacts if the parent chooses. The overlapping settings and defaults Roblox describes on its website are confusing. There are age groups users are sorted into based on age verification results (under 9, 9-12, 13-15,

[61] *Experience Chat,* Roblox Support, https://en.help.roblox.com/hc/en-us/articles/203313520-Experience-Chat#:~:text=Playing%20on%20Roblox,experiences%20based%20on%20their%20age (last visited May 11, 2026).
[62] *Party chat, In-App,* Roblox Support, https://en.help.roblox.com/hc/en-us/articles/360000432483-Party-chat-In-App#:~:text=How%20do%20I%20access%20Party,be%20added%20to%20it%20automatically (last visited May 11, 2026).

16-17, 18-20, or 21+).[63] There are different defaults based on some of the age categories: Experience chats are off by default for users under 9 and on by default for users 9 and older; party chats are unavailable for users under 13 and defaulted on for users 13 or older.[64] The terminology used to describe the various features and settings is confusing. For example, the company describes settings related to both "Connections" and "Friends" on its chat parental controls page.[65] In addition, it is not always clear what settings a child has by default and what limitations cannot be altered even with parental permission. A parent can go in and review their child's settings and approved contacts, but to do so, they must create their own Roblox account and link it to their child's.[66]

Upon close reading, Roblox's safety policies and guidelines contain a major caveat. The company has touted its recent age check policy change as "an important investment in user safety [that] enables age-appropriate communication and limits conversations between adults and minors."[67] On its Parental Controls webpage, the company is definitive:

> Communication controls allow you to determine who your child can chat with on Roblox. All users who want to communicate on Roblox need to confirm their age via Facial Age Estimation or ID verification.[68]

But despite Roblox's policy statements and assurances, communicating with child users on Roblox is easy, leaving them vulnerable to harmful contacts and attempts to lure them onto other platforms. In the fine print on its parental controls page, Roblox adds that, "These settings do not apply to chat features developed independently by

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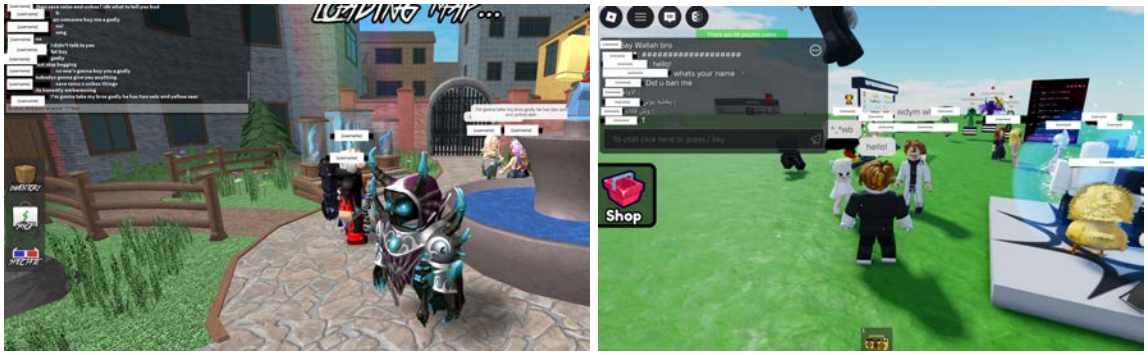
[63] Matt Kaufman and Rajiv Bhatia, *Roblox Requires Age Checks for Communication, Ushering in New Safety Standards,* Roblox Newsroom (Nov. 18, 2025), https://about.roblox.com/newsroom/2025/11/roblox-requires-age-checks-limits-minor-and-adult-chat.
[64] *Safety by Age Safer Settings for All Ages,* Roblox Support, https://about.roblox.com/safety-by-age (last visited May 11, 2026).
[65] *Parental Controls Determine how your child communicates on Roblox,* Roblox Support https://about.roblox.com/parental-controls#set-communication-guardrails (last visited May 11, 2026).
[66] *Parental Controls Overview,* Roblox Support, https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview (last visited Feb. 20, 2026); Roblox, *Parental Controls Overview,* Roblox Support (Jan. 30, 2026), https://archive.is/GAe89.
[67] *Roblox Requires Users Worldwide to Age-Check to Access Chat,* Roblox News Details (Jan. 7, 2026), https://ir.roblox.com/news/news-details/2026/Roblox-Requires-Users-Worldwide-to-Age-Check-to-Access-Chat/default.aspx.
[68] *Set communications guardrails,* Roblox Parental Controls, https://about.roblox.com/parental-controls#set-communication-guardrails (last visited Apr. 7, 2026); Roblox, *Set Communications guardrails, Roblox Parental Controls,* archivetoday.com (Feb. 11, 2026), https://archive.is/wC5vA.

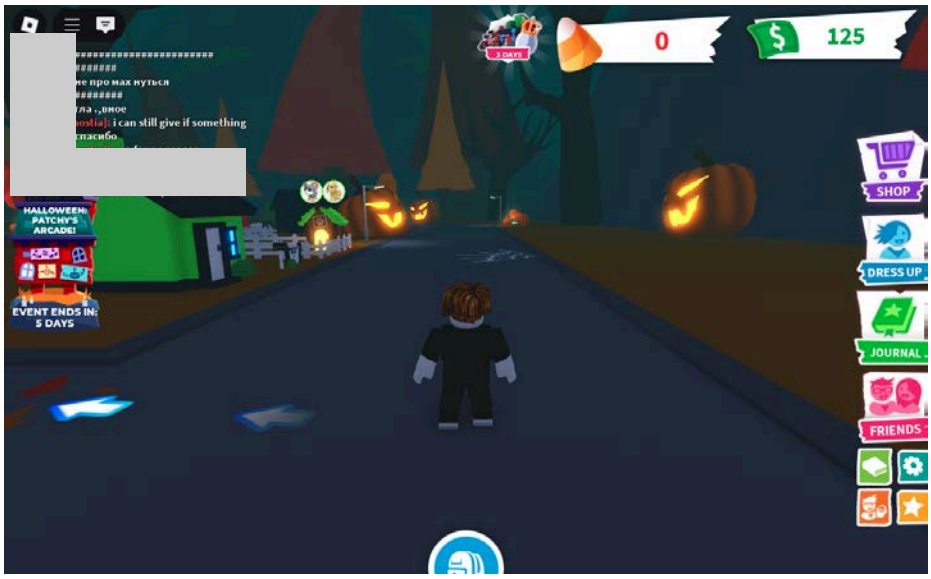
developers."[69] The developer of an experience can build in-experience chat features that allow users to communicate with each other (instead of relying on the built-in Roblox chat features that now require age verification). These features appear identical to Roblox's experience chats, but have none of the guardrails.



On the left, a screenshot showing a dialog box in the upper left corner with Roblox's official in-experience chat. On the right, a screenshot showing a dialog box in the upper left corner with a custom developer chat from the experience Chatbox 2.0. Chatbox 2.0 still offers a custom developer chat to unverified, underage users as of May 18, 2026.

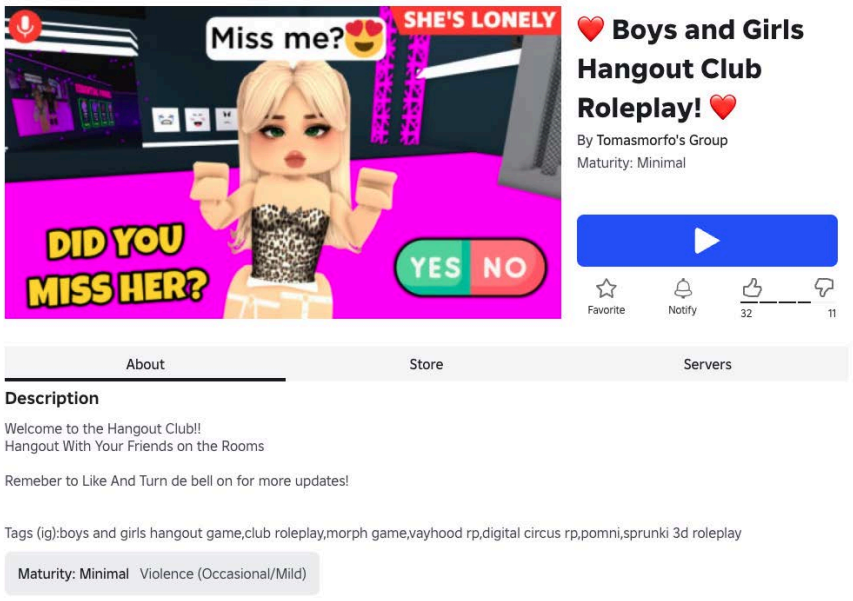
These and other communication loopholes still pose substantial risks to child users. NCOSE and Fairplay researchers' tests over the last several months (which have overlapped with Roblox's rollout of the policies and protections described above) repeatedly showed that adults can access children on the platform. In November 2025, NCOSE staff observed that a test account registered as a 5-year-old could join multiple experiences and chat with all other players. While private messaging was disabled, it was clear that exchanging basic contact information for another platform, such as a cell phone or social media account, would be relatively easy.

[69] *Parental Controls Overview,* Roblox Support, https://en.help.roblox.com/hc/en-us/articles/30428310121620-Parental-Controls-Overview (last visited Feb. 20, 2026); Roblox, *Parental Controls Overview,* archivetoday.com (Jan. 30, 2026), https://archive.is/GAe89.

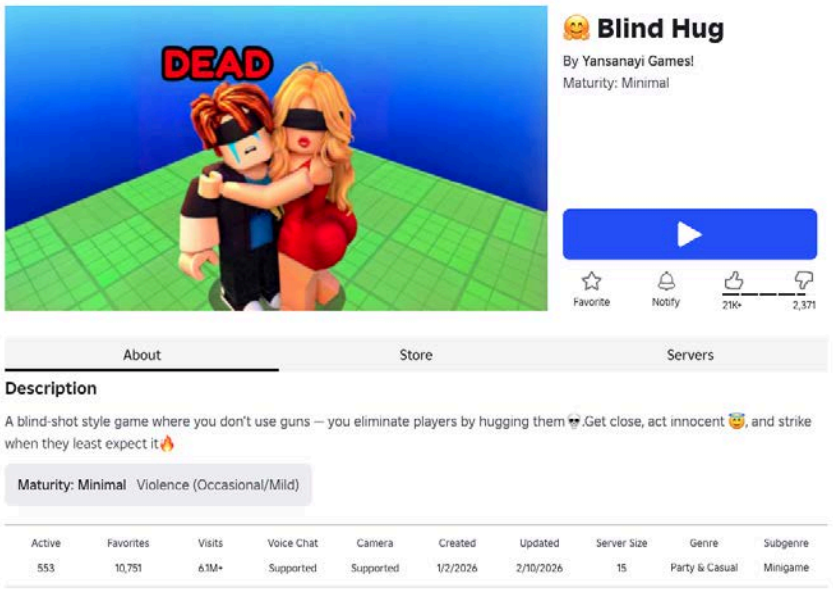


An NCOSE test account registered for age 5 had access to experience chat in November 2025.

Similarly, testing performed by NCOSE researchers in October 2025 found that a newly created test account registered to a 5-year-old required no verification or parental consent and immediately gained access to dating, romance, and "Omegle-style" voice chat experiences where the user could be connected with strangers online.



An example of a romance "role play" experience NCOSE researchers accessed in November 2025 with an account registered to a 5-year-old. The experience is rated as "Minimal" maturity.

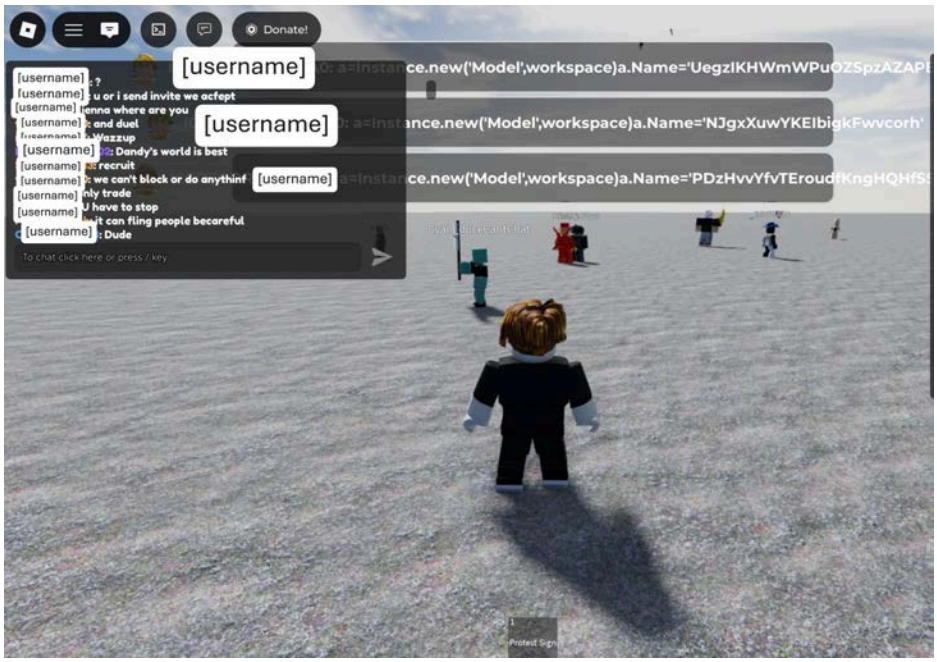


Another example of an experience researchers found that markets romantic and sexual experiences with strangers.

Accounts registered to children still have access to experiences where they can be targeted by adults despite the recent policy changes. In February 2026, Fairplay researchers were able to enter multiple experiences in Roblox that allowed them to freely chat with strangers, all while using test accounts registered as under 13 and that had not gone through the age verification process or received parental permission to access those features. The in-experience chat features discovered by Fairplay researchers appear remarkably similar to the Roblox chat features that are supposed to now require ID or age verification and parental consent. While using under-13 test accounts, Fairplay researchers witnessed the use of sexual references and racial slurs within minutes of entering an experience called “ChatSim,” which explicitly advertises in its thumbnail that players can “chat without restrictions.”



In the Roblox experience Chathub, a Roblox developer created a custom in-experience chat dialog that looks and works much like Roblox's default, built-in chat feature. Developer-created in-experience chat features do not require age verification or verified parental consent to be accessed by users under 13.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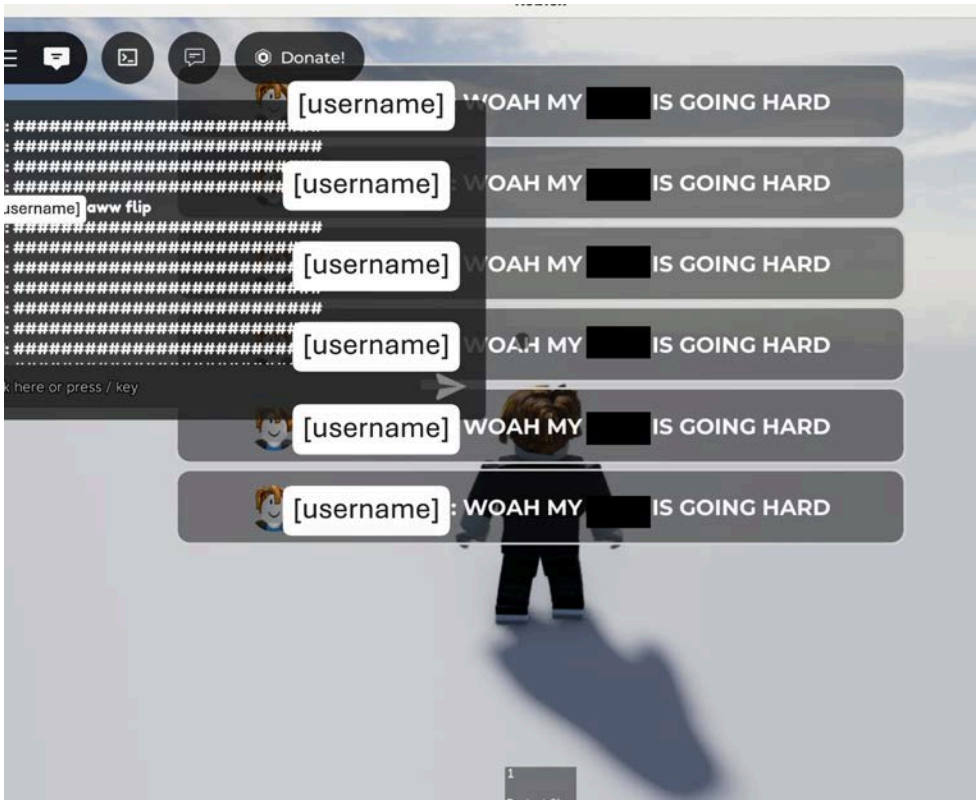
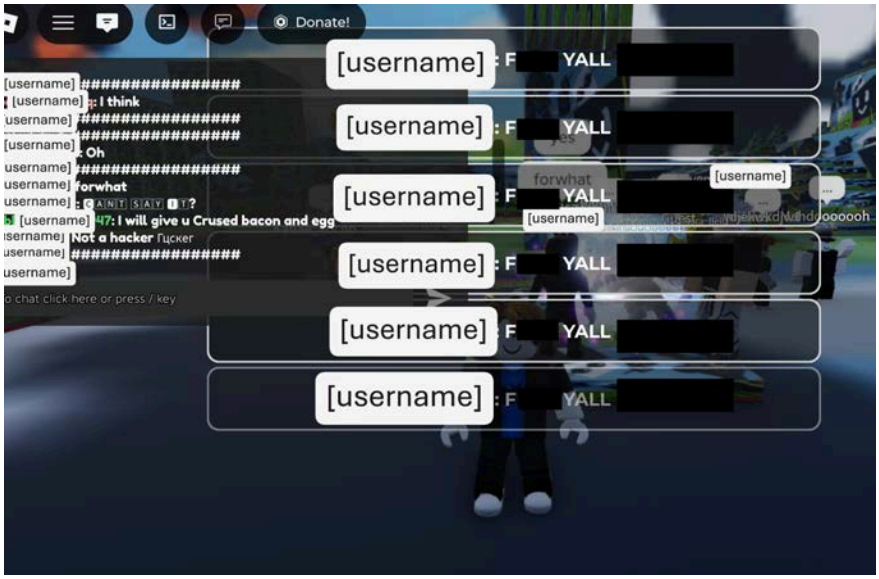
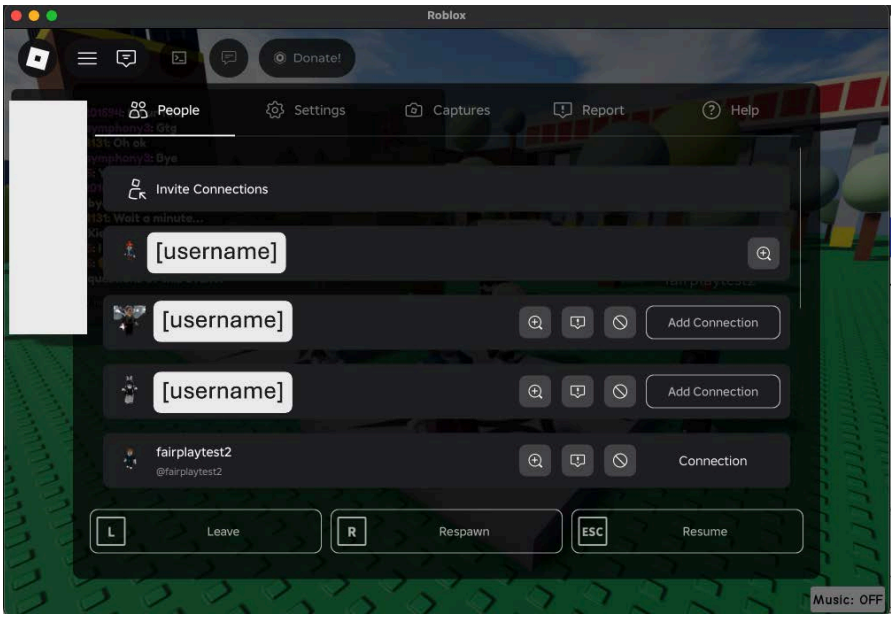


An account registered as under 13 and which has not undergone age estimation or verified parental consent is shown sexually explicit chats within minutes of entering the Roblox experience ChatSim.

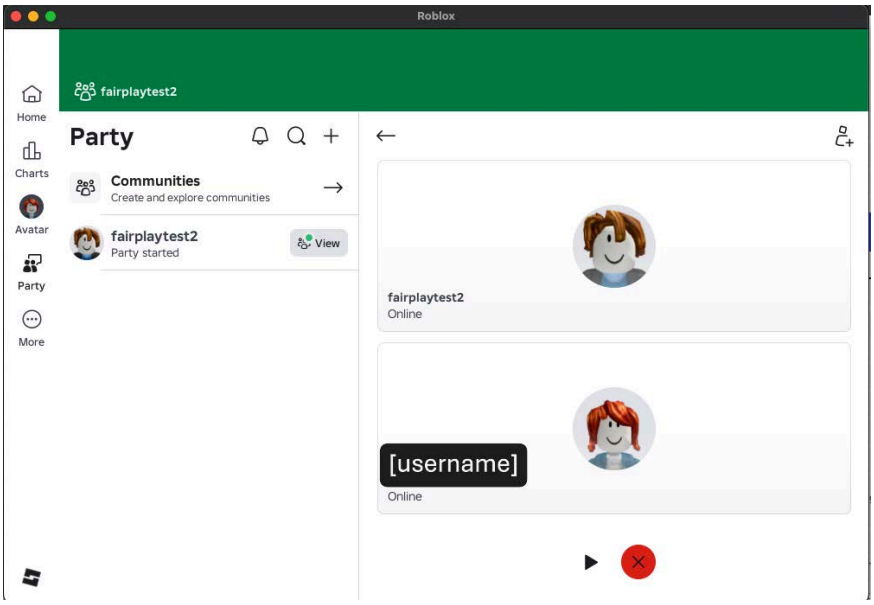


An account registered as under 13 and which has not undergone age estimation or verified parental consent is shown chats containing racial slurs and strong language within minutes of entering the Roblox experience ChatSim.

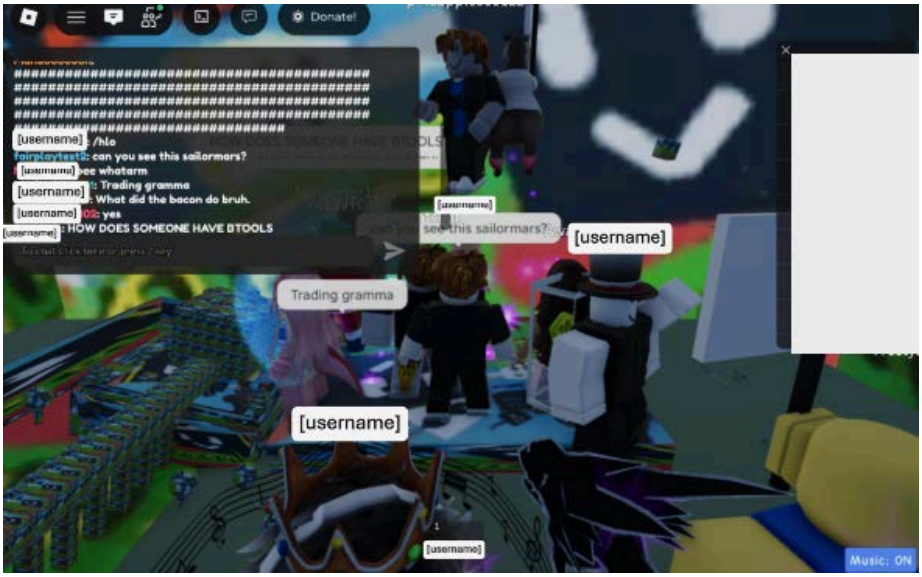
Fairplay test accounts also received multiple connection requests from strangers while inside ChatSim during their February 2026 test. Fairplay researchers used the connection request feature to connect their accounts, which were registered as under 13. Once the accounts were connected, they were able to create and join a “party” chat with one another. This allows one account to invite the other account into an experience that utilizes a custom developer chat feature not subject to the limitations Roblox has placed on its own chat features.



An account registered as under 13 and which has not undergone age estimation or verified parental consent is given the option to “add connection” with other accounts within the Roblox experience ChatSim.



Once connected, two test accounts registered as under 13 and which have not undergone age estimation or verified parental consent are able to join a party.



Two test accounts registered as under 13 and which have not undergone age estimation or verified parental consent are joined in a "party," allowing the accounts to invite each other into the Roblox experience ChatSim, where they can communicate through the developer's custom in-experience chat features.

Follow-up testing in March 2026 indicated this connection loophole may now be closed, but according to Roblox's November 2025 safety policy announcements, it should never

have been possible to begin with.[70] Further, it appears as of March 2026 that it is still possible for an adult stranger to meet an underage user in an experience, communicate with them through a chat feature built by a developer, send a connection request, and invite that underage user into experiences with their own chat features to continue communicating.

Ultimately, Roblox has a long history of insufficient and reactive safety measures for chat and communications on its platform. Multiple third-party investigations over the years have demonstrated that predatory adults can easily create child accounts, bypass age restrictions, access children in private or semi-private settings, and expose minors to sexual content and direct contact. In Spring 2023, NCOSE placed Roblox on the Dirty Dozen List and sent it a formal notification letter outlining how Roblox's chat and communication features exposed children to significant risks of exploitation and abuse. Adult strangers could direct message and "friend" children, bypassing parental controls that falsely claimed to disable chatting. In-game chatting was enabled by default, allowing unrestricted communication between young children and other users, including adults. The platform's filtering system failed to block inappropriate content, and parents were unable to monitor private messages or prevent strangers from sending friend requests. Additionally, children were exposed to sexually explicit material, and Roblox's inadequate parental controls created a false sense of security, leaving minors vulnerable to grooming and exploitation.[71]

In Spring 2024, NCOSE again placed Roblox on the Dirty Dozen List and sent a notification letter outlining platform harms.[72] At this time, Roblox exacerbated existing safety issues by launching the "Roblox Connect" feature, enabling voice calls that provided predators with new ways to exploit minors. Voice chat, accessible to users over 13 with phone verification, allowed real-time verbal interactions between adults and minors, with reports of minors overhearing sexual conversations and inappropriate noises. In-game chat remained enabled by default, even for accounts registered as young as 5 years old, and public chat content was often unmoderated or incomprehensible. At the time, child safety advocates spoke out against the new feature, including NCOSE, which stated:

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[70] Matt Kaufman and Rajiv Bhatia, *Roblox Requires Age Checks for Communication, Ushering in New Safety Standard*, Roblox Newsroom (Nov. 18, 2025), https://about.roblox.com/newsroom/2025/11/roblox-requires-age-checks-limits-minor-and-adult-chat.

[71] Letter from National Center on Sexual Exploitation on Notification for being placed on the 2023 Dirty Dozen List for facilitating child sexual exploitation and abuse to Roblox (May, 1, 2023) (on file with author).

[72] Letter from National Center on Sexual Exploitation on Notification for being placed on the 2024 Dirty Dozen List for facilitating sexual exploitation and abuse by refusing to implement basic child safety measures to Roblox (Apr. 3, 2024) (on file with author).

> Voice chats are a known method predators use for grooming – as it is near impossible to monitor them. There have been multiple cases of predators using Roblox to sexually exploit, abuse, even kidnap, children. Yet instead of prioritizing greater measures to safeguard kids, the company irresponsibly chose to release a feature that may very well provide predators with yet another way to reach potential victims.[73]

Roblox failed at the time to implement parental approval, identity verification, or effective safety measures, thereby allowing children to create accounts and interact with adults without restriction.

Other organizations have investigated Roblox's safety features and reached similar conclusions. In April 2025, a Revealing Reality report found that adult testers effortlessly friended child accounts, entered sexually suggestive hotel environments with child accounts, and observed or participated in adult-themed conversations.[74] For example, investigators "found that their [minor-aged] test avatars overheard conversations between other players verbalizing sexual activity, as well as repeated slurping, kissing and grunting noises, when using the voice chat function." This was despite Roblox claims that "all voice chat — which is available to phone-verified accounts registered as belonging to users aged 13 and above — is subject to real-time AI moderation. They further found that a test avatar registered to an adult was able to ask for the 5-year-old test avatar's Snapchat details using barely coded language."[75] Revealing Reality released a follow-up report in May 2025. While some overt content was removed after 2025 updates, adults could still falsely declare child ages, and "innocuous" voice-chat experiences (e.g., "Mic Up," "Therapy Sessions") continued to allow unmoderated private voice conversations between adults and minors.[76] An October 2024 Hindenburg Research investigation identified dozens of groups openly trading CSAM, usernames explicitly announcing intent to groom or rape children, and sexual-abuse-themed games accessible to child accounts. Former senior Roblox employees reportedly stated leadership resisted safety measures that would reduce engagement metrics.[77]

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[73] *Roblox Provides Predators with a New Tool to Connect with Kids*, National Center on Sexual Exploitation (November 17, 2023), https://endsexualexploitation.org/articles/roblox-provides-predators-with-a-new-tool-to-connect-with-kids/.
[74] *A Digital Playground? The real guide to Roblox,* Revealing Reality (Apr. 13, 2025), https://revealingreality.co.uk/a-digital-playground-the-real-guide-to-roblox/.
[75] *Risks to Children Playing Roblox 'Deeply Disturbing', Say Researchers*, TBS News (April 14, 2025). https://www.tbsnews.net/tech/risks-children-playing-roblox-deeply-disturbing-researchers-say-1115801.
[76] *Four months on: is Roblox any safer?,* Revealing Reality (May 9, 20225), https://revealingreality.co.uk/four-months-on-is-roblox-any-safer/.
[77] *Roblox: Inflated Key Metrics For Wall Street And A Pedophile Hellscape For Kids,* Hindenburg Research (Oct. 8, 2024), https://hindenburgresearch.com/roblox/.

In addition to the NCOSE and Revealing Reality reports, Roblox has been alerted to child sexual abuse and grooming on its platform by families, news reports, and lawsuits over the years. Thousands of parents have signed petitions pleading with Roblox to improve child safety and privacy features.[78] For years, news articles have covered stories of grooming and exploitation occurring on the platform. The following is just a sample:

- In January 2026, a 12-year-old girl and a 15-year-old girl were kidnapped by a man who authorities said they began communicating with on Roblox in 2025.[79]
- In September 2025, a mother filed a wrongful death lawsuit after her teenage, autistic son died by suicide following sextortion by an alleged predator who contacted him on Roblox.[80]
- In August 2025, a lawsuit was filed in California against Roblox and Discord after a 10-year-old girl was groomed and abducted from her home. The perpetrator posed as a minor to groom the child and manipulated her into sharing her home address.[81]
- In July 2025, a lawsuit was filed after a 13-year-old girl was groomed, kidnapped, taken across state lines, and sexually assaulted by a man she met on Roblox.[82]
- In 2024, police arrested more than 2 dozen people associated with a pedophile ring on Roblox. These people were arrested for abducting and/or abusing children they had met on Roblox since at least 2018.[83]
- In October 2023, an 11-year-old girl from New Jersey was kidnapped by a man she played video games with on Roblox.[84]

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[78] *ROBLOX: Little Kids Deserve Privacy! Petition*, ParentsTogetherAction (Nov 3, 2025) https://act.parentstogetheraction.org/petitions/roblox-little-kids-deserve-privacy.
[79] Mason Leib, *Siblings rescued after alleged kidnapping by 19-year-old they met on Roblox,* ABC News (Feb. 3, 2026) https://abcnews.com/GMA/News/siblings-rescued-after-alleged-kidnapping-19-year-met/story?id=129794514.
[80] Alexandra Klausner, *Roblox, Discord Sued over Teen Boy's Suicide after Alleged Sexual Abuse Online*, New York Post (Sept. 15, 2025) https://nypost.com/2025/09/15/business/roblox-discord-sued-over-teen-boys-suicide-after-alleged-sexual-abuse-online.
[81] *Family Files Lawsuit Saying Roblox, Discord Failed to Protect 10-Year-Old Daughter before Being Abducted*, WAFB 9 News (Aug. 11, 2025) https://www.wafb.com/2025/08/11/family-files-lawsuit-saying-roblox-discord-failed-protect-10-year-old-daughter-being-abducted/.
[82] *Family Sues Roblox, Grooming, Kidnapping Lawsuit – SGGH & Milberg*, EZ Newswire, (Aug. 12, 2025) https://www.eznewswire.com/newsroom/family-sues-roblox-grooming-kidnapping-lawsuit-sggh-milberg.
[83] Cecilia D'Anastasio, *Roblox's Pedophile Problem*, Bloomberg (July 23, 2024) https://www.bloomberg.com/features/2024-roblox-pedophile-problem/.
[84] *Roblox Kidnapping in New Jersey: Online Grooming Case Raises Concerns*, ABC 7 New York (Oct. 21, 2023) https://abc7ny.com/roblox-kidnapping-new-jersey-online-grooming/13927383/ (last visited Oct. 29, 2025).

- In June 2023, a minor "under 16" was sexually abused in California by a 21-year-old man she met on Roblox.[85]
- In April 2023, a 13-year-old boy from Utah met a predator on Roblox, was groomed publicly on Twitter, then kidnapped and sexually assaulted before being rescued.[86]
- In April 2023, a 14-year-old girl from Ohio was sexually assaulted by a man she met on Roblox. The man posed as a 17-year-old on the platform and convinced the girl to send him nude images before picking her up from school and sexually assaulting her.[87]
- In March 2023, a 40-year-old California man was arrested after traveling across the country to sexually abuse a 14-year-old he met and groomed on Roblox.[88]
- In February 2022, a 13-year-old girl in Topeka was rescued from a man she met on Roblox who was sex trafficking her.[89]
- In 2022, an 8-year-old girl in North Carolina was targeted by an online predator on Roblox who asked her to send him "hot videos." The girl's mother said she had parental controls on all the devices her kids used.[90]
- In April 2022, a Florida man was arrested after kidnapping a 12-year-old boy he met on Roblox. The man's charges included sexual battery of a child under 12, kidnapping of a child under 13, traveling to meet a minor for sex, and child abuse.[91]

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[85] Kaley Soren, *Man Arrested after Sexually Abusing Minor He Met on Roblox: BPD*, KGET 17 News (Jun. 27, 2023) https://www.kget.com/news/crime-watch/man-arrested-after-sexually-abusing-minor-he-met-on-roblox-bpd/. (last visited Oct. 29, 2025).

[86] Ben Collins, *Boy Kidnapped and Groomed on Discord, Roblox, Mother Says*, NBC News (March 10, 2023) https://www.nbcnews.com/tech/social-media/twitter-elon-musk-boy-kidnapped-groomed-discord-roblox-mcconney-rcna77985.

[87] Dave Spencer, *Feds: Saline Man Met Girl, 14, Playing Roblox Online Game and Sexually Assaulted Her*, FOX 2 Detroit (Apr. 26, 2023) https://www.fox2detroit.com/news/feds-saline-man-met-girl-14-playing-roblox-online-game-and-sexually-assaulted-her.

[88] Bill Shannon, *Man Traveled across the Country to Sleep with Altoona Teen, Police Report*, WTAJ News (March 13, 2023) https://www.wtaj.com/news/local-news/man-traveled-across-the-country-to-sleep-with-altoona-teen-police-report/.

[89] Mark Feuerborn, *Accused Topeka Teen Trafficker Found with Child Porn, Court Filing Says*, KSNT News (May 5, 2022) https://www.ksnt.com/news/local-news/accused-topeka-teen-trafficker-found-with-child-porn-court-filing-says/.

[90] Anna Austin Boyers and Debra Worley, *Girl, 8, Targeted by Child Predator on Roblox, Mom Says*, WCJB 20 News (Jul. 11, 2022) https://www.wcjb.com/2022/07/11/girl-8-targeted-by-child-predator-roblox-mom-says/.

[91] Jorge Borges, *Florida Man Arrested for Kidnapping a Child He Met on Roblox*, Tampa Free Press (Apr. 17, 2022), https://www.tampafp.com/florida-man-arrested-for-kidnapping-a-child-he-met-on-roblox/.

- In 2021, an 11-year-old girl in California went missing and was found with her abuser, who used Roblox to groom and lure her to his friend's apartment, where he attempted to take his own life when police arrived to rescue the girl.[92]
- In 2021, a 12-year-old boy in Texas was solicited by a 23-year-old man on Roblox. The man was charged with indecent solicitation of a child, violation of sex offender registry, and grooming.[93]
- In 2019, an 18-year-old man was charged with 26 counts of child pornography after soliciting nude images from children ages 10 to 12 on Roblox.[94]
- In 2017, a 12-year-old boy in New Jersey was groomed by a 56-year-old Virginia man on Roblox.[95]

The evidence is abundantly clear that Roblox's communication features have been connecting children to harmful and exploitative adults for years.

Section 5 Unfairness Claims

Under the FTC's Policy Statement on Unfairness, an act or practice is unfair if (1) it results in substantial consumer injury; (2) the injury is not outweighed by countervailing benefits to consumers or competition, and (3) the injury cannot be reasonably avoided by consumers.[96] The Commission considers the particular vulnerability of the class of consumers at issue when analyzing claims of unfairness.[97] This is true of cases in which unfair conduct is targeted at children.[98] We urge the FTC to

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[92] Alexis Rivas, *National City Kidnapping Case Highlights Growing Role of Gaming Apps in Child Exploitation*, NBC 7 San Diego (Feb. 7, 2021) https://www.nbcsandiego.com/news/national-international/national-city-kidnapping-case-highlights-growing-role-of-gaming-apps-in-child-exploitation/2513779/.

[93] Jeff Bonty, *Man Charged with Soliciting Juvenile through Roblox*, Shaw Local Daily Journal Kankakee, IL (July 23, 2021) https://www.daily-journal.com/news/crime/man-charged-with-soliciting-juvenile-through-roblox/article_d5459446-eb22-11eb-8fdc-1f1054f1f8d9.html.

[94] Nick Samuel, *Man Charged with 26 Counts of Child Porn, Used Online Game to Target Children*, Vero News (Aug. 21, 2019) https://veronews.com/2019/08/21/man-charged-with-26-counts-of-child-porn-used-online-game-to-target-children/.

[95] Pei-Sze Cheng, *I-Team: NJ Mom Says Sexual Predator Targeted 12-Year-Old Son on Roblox*, NBC New York (Dec. 4, 2018) https://www.nbcnewyork.com/news/local/i-team-nj-mom-says-sexual-predator-targeted-12-year-old-son-roblox/103960/.

[96] *Policy Statement on Unfairness*, Federal Trade Commission (Dec. 17, 1980), https://www.ftc.gov/legal-library/browse/ftc-policy-statement-unfairness.

[97] Id; FTC v. Sperry & Hutchinson Co., 405 U.S. 233 (1972); *See also* Thomas B. Leary, *Unfairness and the Internet,* Federal Trade Commission (Apr. 13, 2000), https://www.ftc.gov/news-events/news/speeches/unfairness-internet

[98] *Policy Statement on Unfairness,* Federal Trade Commission (Dec. 17, 1980), https://www.ftc.gov/legal-library/browse/ftc-policy-statement-unfairness; Thomas B. Leary, *Unfairness and the Internet*, Federal Trade Commission (Apr. 13, 2000), https://www.ftc.gov/news-events/news/speeches/unfairness-internet.

investigate Roblox's conduct both in offering and promoting virtual currencies and virtual assets to children for violations of Section 5 of the FTC Act.

IV. Roblox's conduct in marketing virtual currencies and virtual assets to children is unfair in violation of Section 5 of the FTC Act.

Roblox's virtual currency and virtual asset design features result in substantial financial and physical and mental health injury. These injuries are not outweighed by any countervailing benefits to consumers or competition. These design features prey upon children's developmental vulnerabilities, making it impossible for children to reasonably avoid injury.

A. Roblox's conduct promoting virtual currencies and virtual assets to children results in substantial consumer injury.

Robux and other layered currencies are central to fueling Roblox's complex in-game economy. These virtual currencies are used to facilitate the sale of virtual assets, which are heavily marketed to children as both essential to gameplay and social standing on the platform. Additional design techniques further push children to buy virtual assets. Roblox's scarcity marketing tactics limit the amount of time an in-game item is available, the available quantity of a given item, or both. Roblox also gives players the ability to inspect each other's inventories of digital items, making a player's purchase history a visible status symbol. All of these features cause substantial harm to young consumers. First, the use of virtual currencies and manipulative monetization practices lead to substantial financial harm. Second, the centrality of virtual currencies — especially Robux — facilitates and enables child sexual exploitation and abuse. Finally, Roblox's virtual asset marketing leads to negative social comparison and bullying.

1. Financial harm

As described in Section II above, Roblox leverages a complex web of virtual currencies to manipulate young users into spending money on its platform. This system is coupled with virtual asset marketing and design choices, including manufactured scarcity and visible asset inventories, that create immense pressure on children to participate in the platform's in-game economy. While many purchases on Roblox are for small amounts of money, these purchases can add up to substantial amounts of money very quickly.

Families' financial losses as a result of Roblox's monetization practices are well-documented. The nonprofit ParentsTogether gathered testimonies from parents

whose children were manipulated or tricked into spending excessive amounts of money on the platform.[99] One parent discovered that his 10-year-old daughter spent more than $7,000 on Roblox over a two-month period, despite his attempts to place a spending cap on his daughter's account.[100] Another parent discovered that her son spent more than $1,000 on virtual items that he would give away as gifts within the platform in an effort to make friends.[101] Yet another parent discovered that his daughter spent more than $5,000 on Roblox without understanding that she was spending real money at all.[102] These experiences are consistent with news reports that describe financial losses on Roblox. Parents have described incurring hundreds and thousands of dollars in unexpected Roblox charges when their children have figured out how to buy Robux.[103] Online forums are rife with similar stories.[104]

These extreme financial losses are many times unrecoverable. As discussed above, Robux and other in-game layered currencies on the platform are not subject to consumer protections generally available for purchases made with fiat currency. Roblox has discretion to decide whether to provide a refund for accidental or exorbitant Robux purchases. Roblox will even ban players from the platform for seeking financial relief through their bank or credit card providers, as it considers "charge-backs" a violation of its Terms of Service.[105]

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[99] *Warning for Parents: Kids spending thousands of dollars on "free" Roblox game,* ParentsTogether (Jun. 21, 2021), https://parents-together.org/warning-for-parents-kids-spending-thousands-of-dollars-on-free-roblox-game/.

[100] *Id.*

[101] *Id.*

[102] *Warning for Parents: Kids spending thousands of dollars on "free" Roblox game,* ParentsTogether (Jun. 21, 2021), https://parents-together.org/warning-for-parents-kids-spending-thousands-of-dollars-on-free-roblox-game/.

[103] Yi-Jin Yu, *Mom shares lessons learned after son spends over $800 on Roblox purchases,* ABC News (Dec. 23, 2022), https://abcnews.go.com/GMA/Family/mom-shares-lessons-learned-after-son-spends-800/story?id=95749984; https://www.bbc.com/news/uk-wales-65659896; Anna Tims, *Our 11-year-old daughter ran up a £2,400 Roblox Gaming Bill,* Guardian (Feb. 25, 2021), https://www.theguardian.com/money/2021/feb/25/our-11-year-old-daughter-ran-up-a-2400-gaming-bill.

[104] Reddit RobloxHelp, *Apple refusing to refund for $2,000+ in unauthorized Roblox purchases made by 9-year-old-what are my options?,* archivetoday.com (Feb. 6, 2026), https://archive.is/APfhk; Parenting Reddit Comments, *My 10yo screwed up big time,* archivetoday.com (Feb. 6, 2026), https://archive.is/afYbO.

[105] *Unauthorized Charges & Refund Requests,* Roblox Support, https://en.help.roblox.com/hc/en-us/articles/203312650-Unauthorized-Charges-Refund-Requests (last visited Feb. 20, 2026).

2. Predation, sexual exploitation and abuse

Roblox's provision of virtual currencies to children also results in substantial injury by providing a mechanism for sexual exploitation and abuse. There is credible and growing evidence that predators use Robux as a tool for grooming, manipulation, and sexual exploitation of minors. The following patterns are evident: (1) Robux is perceived by children as having high social and financial value and is easily obtained or exchanged; (2) predators have offered or used Robux to solicit sexually explicit content or coerce children; (3) the platform's design of monetization and informal economy may increase minors' vulnerability.

Multiple news outlets and lawsuits report that predators have used Robux (or the promise of Robux) to groom or exploit minors. In 2023, it was reported that "some [Roblox] users were offering children money to perform sexual acts. This was done through the in-game 'Robux' currency. This could include being paid Robux to play a role-playing game, such as being 'adopted' or lying down on top of another avatar."[106] A 2025 Thorn survey of 1,200 young people ages 13-20 in the US found that approximately 1 in 7 young people (15%) reported having at least one sexual interaction in exchange for money/cryptocurrency, gift cards, or another item of value while they were under the age of 18. Among respondents who indicated they had a commodified sexual interaction as a minor, almost 1 in 10 (9%) indicated they received gaming currency (e.g., Robux, V-Bucks, Minecoins) as part of the exchange for sexual content or activity.[107] Lawsuits and state officials have continued to document this phenomenon. A lawsuit by a North Carolina mother alleges a predator offered Robux in exchange for explicit images of a 10-year-old girl on Roblox.[108] And it has been reported that Florida state authorities say Robux were used to bribe minors in grooming or extortion scenarios.[109]

Extensive empirical research demonstrates that childhood sexual abuse and grooming, including online grooming and abuse, inflict profound, long-term emotional

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[106] Daniel Lo Surdo, *Is Roblox safe? Safety experts don't think so*, The Daily Aus (Apr. 29, 2023), https://thedailyaus.com.au/news/is-roblox-safe-one-online-safety-expert-doesnt-think-so.
[107] Data & Intelligence, *Commodified Sexual Interactions Involving Minors: Evolving Dynamics in Technology-Facilitated Child Sexual Exploitation,* Thorn (Apr. 2025), https://info.thorn.org/hubfs/Research/Thorn_CommodifiedSexualInteractionsInvolvingMinors_Apr2025.pdf.
[108] Zilber, Ariel, *Roblox predator lured girl, 10 with "Robux" for explicit photos (lawsuit)*, New York Post (Aug. 22, 2025), https://nypost.com/2025/08/22/business/roblox-predator-lured-girl-10-with-robux-for-explicit-photos-lawsuit/.
[109] Herzlich, Taylor, *Florida AG says Roblox used to 'abuse kids' as criminal probe sparked,* New York Post (Oct. 20, 2025), https://nypost.com/2025/10/20/business/florida-ag-roblox-is-breeding-ground-for-child-predators/.

and psychological injuries on minors. A 2024 review in *SN Social Sciences* synthesizing studies from 2010–2022 found that such abuse is strongly correlated with immediate trauma symptoms — including PTSD, anxiety, stress, and social isolation — as well as enduring harm such as disrupted intimate relationships, social and emotional health problems, and elevated risk of revictimization.[110] Moreover, a 2023 qualitative study in *Frontiers in Psychology* that interviewed adult survivors of online sexual abuse (OSA) during childhood revealed persistent anxiety, self-blame, low mood, and even self-harm many years later.[111] Participants in that study also described manipulation and coercion during grooming, which undermined their sense of agency and made it difficult for them later to form healthy romantic relationships.[112]

The widespread and well-documented sexual abuse, grooming, and sextortion of children that Roblox's platform has directly facilitated constitutes a clear and substantial injury under Section 5 of the FTC Act. These harms inflict severe and irreversible physical, psychological, and emotional damage on minor consumers — harms that courts and the Commission have long recognized as the archetype of substantial injury.

3. Bullying and social pressure

Roblox's overall emphasis on virtual items and heavy use of scarcity marketing tactics and visible inventory features contribute to a culture of bullying and exclusion that negatively impacts the platform's young users. Fairplay's research with children ages 9-15 revealed that bullying is one of the biggest obstacles that young people contend with on social gaming platforms. Bullying proliferates on Roblox in large part because virtual items contribute to a culture of haves and have-nots. Participants in focus group discussions described the way highly desirable, often expensive virtual items are associated with popularity, while styling an avatar using inexpensive or default items made players vulnerable to criticism. Focus group participants' experiences included:

- "So, yeah, like, if you have more expensive stuff, like, people are gonna treat you differently." 14-year-old, 6th-8th grade focus group
- "More like making fun or like picking on something like. 'Oh, you're bacon like. Oh, you're a noob.' If you're like, if you're younger, you

[110] Ali, S., Pasha, S., Cox, A. *et al., Examining the short and long-term impacts of child sexual abuse: a review study,* 4 *SN Soc Sci* 56, (2024), https://doi.org/10.1007/s43545-024-00852-6.
[111] Schmidt, F., Varese, F., & Bucci, S., *Understanding the prolonged impact of online sexual abuse occurring in childhood*. 14 Front. Psychol. 1281996, (2023), https://doi.org/10.3389/fpsyg.2023.1281996.
[112] *Id.*

just take that stuff really seriously, like what others say about you." 11-year-old, 6th - 8th grade focus group

- "Like the popularity thing I was talking about earlier. It's like, when they have, like, a cooler looking avatar, sometimes, like, they, they have more friends, and they're more popular. And then… they bully more sometimes because they're like, 'Oh, yeah, I have this, and you only have this. But I have like all this stuff, and you only have that.'" 12-year-old, Black-identifying focus group
- "I really agree with [name redacted] and [name redacted], actually. Not only is it default, it can also be just the bully's opinion. It's normally like, if they just think that whatever you purchased is, like, not worth it. And they're just like: 'Hey, how come you would ever purchase that? That's so like ugly like. Why would you ever do that in it?' That . . . it really hurts the creator of the avatar's feelings, and even so they can always add on to that. It doesn't mean that you should be mean right back. It should just mean you have your opinions. I have mine." 11-year-old, 4th and 5th grade focus group

The prevalence of bullying over virtual items on Roblox is further underscored by the platform's culture of giving away Robux to help those who may be the target of ridicule, or to earn friendship. One parent told a reporter that her sons spent $1,250 on Roblox in part because one of them was trying to build friendship with bullies: "He was being bullied at middle school and was buying Robux to give to boys targeting him… He was trying to buy their friendship."[113] There are dedicated experiences on Roblox designed for users to solicit Robux donations, with leaderboards for the players that have given away the most money to others.[114]

Children also experience bullying on Roblox when they try to use virtual items and avatar styling to represent themselves. For example, young users in Fairplay's focus groups described being targeted and harassed on social gaming platforms if their avatar identified them as Black or LGBTQ+. They shared:

- "Some people on *Roblox* are like, really homophobic like, it's, it's so crazy like." 13-year-old, LGBTQ+ focus group
- "Let's say, like, you're a specific avatar. There's some games – like more [player versus player] based games – where, like, this person

[113] Jane Ridley, *The hidden dangers of Roblox for kids bullying and secret spending,* N.Y. Post (Mar. 23, 2021), https://nypost.com/2021/03/23/the-hidden-dangers-of-roblox-for-kids-bullying-and-secret-spending/.
[114] Buying to Belong, *supra* note 7, at 30.

chases you around, and, like, repeatedly kills you, so it makes it hard to enjoy the game." 15-year-old, LGBTQ+ focus group

- Participant 1: "Yeah, but like in voice chat games, like, people [. . .] put on a darker skin tone so they can like –"
  Participant 2: "Troll!"
  Participant 1: "Yeah."
  Participant 2: "Yes, they're pretending to be Black, and then they start being racist." 12-year-old and 14-year-old, Black-identifying focus group

These experiences reflect observations Fairplay researchers have made firsthand while studying the platform, including the use of Nazi flags to harass players.



A Fairplay researcher witnessed an avatar holding a flag emblazoned with a Nazi swastika participating in a homophobic discussion in the Roblox experience LGBTQ+ Hangout.

Ultimately, Roblox's culture of exclusivity and cyberbullying users who are perceived as "less than" poses serious long-term risks to young users. Exposure to design and marketing tactics that emphasize scarcity and social belonging through virtual goods "can distort how young people perceive social status and understand self-worth in ways that can limit self-acceptance and make it difficult to form the supportive relationships that are essential to mental health both online and offline."[115] In

[115] Buying to belong, *supra* note 7, at 38.

previous filings to the Commission, Fairplay has described the impact bullying has on minors:

> The negative effects of cyberbullying on the mental health and well-being of minors are also well-documented in scientific research. Studies have correlated cyberbullying with elevated stress and depression levels and feelings of sadness, hopelessness, powerlessness, and emotional distress. Critically, cyberbullying has also been closely associated with increased risk of suicidality (suicidal ideation and attempts) among adolescents. Meta-analyses of cyberbullying studies have repeatedly identified a positive association between cyberbullying and suicidality and/or self-harm. A study by cyberbullying experts Sameer Hinduja and Justin W. Patchin found that U.S. middle and high schoolers who experience both offline and online bullying were five times more likely to report suicidal ideation and over 11 times more likely to attempt suicide than students who had not been bullied."[116]

Bullying on Roblox presents a substantial, urgent harm to its millions of young users, much of it rooted in an entirely manufactured scarcity and virtual asset "hierarchy" that the company perpetuates for profit.

B. Roblox's conduct in marketing virtual currencies and virtual assets to children is not outweighed by countervailing benefits to consumers or competition.

When the Commission evaluates harmful practices under its authority to prohibit unfair practices, it considers any benefits to consumers or competition as a result of the practice, as well as costs of the proposed remedy, and weighs them against the injury to

[116] Haley Hinkle, Kristin Bride, *Fairplay NGL Complaint,* Fairplay (Oct. 19, 2023), https://fairplayforkids.org/wp-content/uploads/2023/10/NGL_complaint.pdf (citing Charisse L. Nixon, *Current Perspectives: the Impact of Cyberbullying on Adolescent Health*, 5 Adolescent Health, Medicine and Therapeutics 143 (2014), https://www.tandfonline.com/doi/full/10.2147/AHMT.S36456; *see also* Michele P. Hamm, Amanda S. Newton & Annabritt Chisholm, *Prevalence and Effect of Cyberbullying on Children and Young People: A Scope Review of Social Media Studies*, 169 JAMA Pediatrics 770 (2015), https://jamanetwork.com/journals/jamapediatrics/article-abstract/2337786; Ann John, Alexander Charles Glendenning & Amanda Marchant, et al., *Self-Harm, Suicidal Behaviours, and Cyberbullying in Children and Young People: Systematic Review*, 20 J. of Internet Medical Research (2018), https://doi.org/10.2196/jmir.9044; Robin Kowalski, Gary Giumetti, et al., *Bullying in the Digital Age: A Critical Review and Meta-Analysis of Cyberbullying Research Among Youth*, 140 Psychological Bulletin 1073, 1124 (2014) https://doi.org/10.1037/a0035618; Mitch van Geel, Paul Vedder & Jenny Tanilon, *Relationship Between Peer Victimization, Cyberbullying, and Suicide in Children and Adolescents: A Meta-analysis*, 168 JAMA Pediatrics 435, 440 (2014), https://pubmed.ncbi.nlm.nih.gov/24615300/; Sameer Hinduja & Justin W. Patchin, *Connecting Adolescent Suicide to the Severity of Bullying and Cyberbullying*, Journal of School Violence, 18 J. of School Violence 333, 7 (2019), https://www.tandfonline.com/doi/abs/10.1080/15388220.2018.1492417).

consumers.[117] Roblox's conduct in marketing virtual currencies and virtual assets to children serves the company's own profit interests at the expense of families' finances and children's mental and physical health. These harms far outweigh any benefit to consumers or competition. Roblox has designed its platform to manufacture scarcity in virtual assets that are made of mere code and could easily be expanded to better meet demand from its users. These assets are sold using a currency system so complex, it is nearly impossible for a child to make informed purchasing decisions. These tactics cost consumers significantly, as described above. Similarly, they do not benefit competition, but instead incentivize a race to the bottom, where gaming platforms with more manipulative designs earn more money from their users.

C. Children cannot reasonably avoid injuries caused by Roblox's virtual currency or virtual asset marketing.

The substantial harm caused by Roblox's marketing of Robux and other in-game layered currencies cannot reasonably be avoided by young consumers. The Commission's unfairness authority is to be used "not to second-guess the wisdom of particular consumer decisions, but rather to halt some form of seller behavior that unreasonably creates or takes advantage of an obstacle to the free exercise of consumer decision making."[118] The Commission has long protected "susceptible classes of purchasers" from companies that seek to exercise "undue influence" over their purchasing decisions.[119] Here, Roblox's manipulative virtual currencies and virtual asset marketing preys upon young users' developmental vulnerabilities and cognitive biases to drive spending. Finally, children are particularly vulnerable to the social pressures that Roblox's virtual asset marketing generates.

1. Inability to understand complex financial concepts

As discussed above, Roblox pushes players to spend money each time they log on by engineering its in-game economy with sophisticated design and social pressure tactics.[120] Roblox then obscures and abstracts the true cost of virtual items sold on the platform by fluctuating the exchange rate for Robux and in-game layered currencies, and by concealing virtual items behind casino-like lootboxes, crates, raffles, and other games of chance. Finally, Roblox preys upon young users' inability to understand financial concepts and lack of impulse control by using bundled pricing and sunk costs

[117] *FTC Policy Statement on Unfairness*, Federal Trade Commission (Dec. 17, 1980), https://www.ftc.gov/legal-library/browse/ftc-policy-statement-unfairness.
[118] *FTC Policy Statement on Unfairness*, Federal Trade Commission (Dec. 17, 1980), https://www.ftc.gov/legal-library/browse/ftc-policy-statement-unfairness.
[119] *Id.*
[120] Buying to Belong, *supra* note 7, at 24.

that encourage excessive spending. In doing so, Roblox has created a top-down system of financial harm that cannot reasonably be avoided by its young users.

Roblox's in-game currencies and exchange rates make it exceedingly difficult for children to understand how much money they are spending on the platform. As noted above, the exchange rates for fiat currency to Robux and Robux to layered currencies are not fixed. Further, it's nearly impossible to calculate the true cost of a virtual item when a player must convert fiat currency to Robux, Robux to a layered currency, and the layered currency into a lootbox or other variable reward (which further requires a complex understanding of probability). This is especially true for young players, as they will not fully develop financial literacy until adulthood.

Children are navigating a maze of layered currencies on Roblox at a time when their understanding of money and purchasing is just developing. Most children's understanding of money and finance develops in parallel with their cognitive and emotional development.[121] Children in middle childhood (roughly 6-10 years old) may understand basic math concepts like arithmetic, but they struggle with concepts like probability, delayed gratification, and long-term savings.[122] These children are often susceptible to social pressure and regularly report being "tricked" or "scammed" in virtual gaming environments.[123] When children move into adolescence, their grasp of financial concepts increases, but they are highly motivated by rewards and will act impulsively to get them, as discussed in further detail in Section V(C), below.[124] These developmental vulnerabilities are especially salient in Roblox, which estimates that 40% of its daily active users are under 13.[125]

Further, Roblox's use of virtual rather than fiat currencies capitalizes on psychological tricks and logical fallacies even adults are vulnerable to. For example,

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[121] Portia L. Johnson, *Money milestones: Promoting children's financial literacy through parent and caregiver education and socialization*, Journal of the National Extension Association of Family and Consumer Sciences 81, 81-89 (2022), https://neafcs.memberclicks.net/assets/documents/journal/2022-jneafcs/Money%20Milestones.pdf.
[122] Nancy Carlsson-Paige, *Our Latest Report: Young Children in the Digital Age: A Parent's Guide. Defending the Early Years*, Defending the Early Years (Nov. 2018), https://dey.org/publication/our-latest-report-young-children-in-the-digital-age/ (last visited November 17, 2020).
[123] Johnson, P. L., *Money milestones: Promoting children's financial literacy through parent and caregiver education and socialization*, Journal of the National Extension Association of Family and Consumer Sciences 81, 81-89 (2022), https://neafcs.memberclicks.net/assets/documents/journal/2022-jneafcs/Money%20Milestones.pdf.
[124] Zara Abrams, *Why Young Brains Are Especially Vulnerable to Social Media,* American Psychological Association (Aug. 23, 2023), https://www.apa.org/news/apa/2022/social-media-children-teens; Elizabeth M. Alderman, et al., *Unique Needs of the Adolescent*, 144 Pediatrics 6, https://doi.org/10.1542/peds.2019-3150.
[125] *Roblox Corporation 2025 Proxy Statement and 2024 Annual Report,* Roblox (May 29, 2025), https://s27.q4cdn.com/984876518/files/doc_financials/2024/ar/Roblox-2025-Proxy_2024-AR-1-1.pdf

research indicates that individuals feel a "pain of paying" when they spend real-world money.[126] Studies have shown that using abstract forms of payment like casino chips instead of real-world money increases overspending and gambling problems.[127] Studies in the video game context have also documented that virtual currencies increase in-game spending, and that purchasing in-game items with real money is "more painful" than when using virtual currencies.[128] By forcing young users to purchase virtual items with Robux and other layered currencies, Roblox creates a significant distance between the act of obtaining a virtual item and the spending of real world money. This reduces the pain of paying, increasing the likelihood that young users will spend more than they would if they were using real world money.

Roblox makes it exceedingly difficult to fully grasp the true cost of using virtual currencies on its platform. As noted above, the value of Robux can fluctuate depending on how they are purchased, and secondary and tertiary currencies often have nearly incomprehensible exchange rates. Players are often forced to make purchases through randomized reward mechanisms like lootboxes and crates, which require an understanding of complex geometric probability distributions to estimate the amount of attempts needed to win a desired virtual item. This leads to an asymmetric power dynamic wherein young users are not capable of making informed decisions about purchases, even if they have the pricing information necessary to do so. By obscuring and abstracting the true cost of money spent on its platform, Roblox makes it unreasonably difficult for young users to avoid financial harm.

Roblox also takes advantage of sunk cost pressure to push children to spend more on the platform. As explained above, Roblox only sells Robux in fixed bundles, and the per dollar value of those Robux varies depending on the size of the bundle a player purchases. When a player desires to purchase a particular virtual item using Robux, the price of that virtual item rarely aligns with the amount of Robux available in each bundle. As a result, young players are often required to purchase more Robux than what is necessary to obtain the virtual item they are trying to acquire, and they are left with a small amount of Robux in their account after completing the purchase. That small amount of leftover Robux triggers a vicious cycle in which players continuously

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[126] *Insert Coin, supra* note 49, at 19; Dan Ariely and Jeff Kreisler, Dollar and Sense: Money Mishaps and How to Avoid Them (Pan Macmillan, 2018); Priya Raghubir and Joydeep Srivastava, *Monopoly money: The effect of payment coupling and form on spending behavior*, 14 Journal of Experimental Psychology Applied 213, 213-225 (2008), https://doi.org/10.1037/1076-898X.14.3.213; Sarah Hare, *What is the impact of cashless gaming on gambling behaviour and harm?,* Victorian Responsible Gambling Foundation at 9 (July 2020).

[127] Priya Raghubir and Joydeep Srivastava, *Monopoly money: The effect of payment coupling and form on spending behavior*, 14 Journal of Experimental Psychology Applied 213, 213-225 (2008), https://doi.org/10.1037/1076-898X.14.3.213

[128] Sarah Hare, *What is the impact of cashless gaming on gambling behaviour and harm?,* Victorian Responsible Gambling Foundation (July 2020).

purchase additional bundles of Robux in order to avoid losing the value of the leftover Robux in their account.[129]

This manipulative process can begin even before a player has made an initial purchase of Robux. Many Roblox developers begin doling out small amounts of secondary and tertiary currencies to young users as soon as they enter a game or experience.[130] These rewards accumulate based on achievements during gameplay, as well as for engagement-based rewards related to total time spent and streaks. However, it is exceedingly difficult and time consuming for players to accumulate enough secondary and/or tertiary in-game currency to purchase desired virtual items. Instead, developers leave players with just enough currency to instigate the feeling of sunk costs, incentivizing them to supplement their "earned" in-game currency by purchasing Robux. This complex system ultimately makes it exceedingly difficult for a child to understand the true cost of a given virtual item.

2. Sensitivity to social rewards and social pressure

Another reason children cannot avoid injuries from Roblox's virtual asset and virtual currency marketing is because they are particularly sensitive to social rewards. Changes in areas of the brain related to social cognition, emotional regulation, decision-making, and impulse control make adolescents much more susceptible to social rewards than adults.[131] The brain begins changing between the ages of 10-12 as children grow more receptors for hormones that "make social rewards — compliments on a new hairstyle, laughter from a classmate — start to feel a lot more satisfying."[132] During this period, adolescents become more attuned to social status, and "[f]eeling rewarded from positive attention appears to peak."[133] By contrast, an adult's more mature prefrontal cortex and established sense of self help regulate their response to social rewards.[134]

Focus group data from Fairplay's *Buying to Belong* report underscores the fact that young users see Roblox as a social space where they can experiment with expressing themselves. Participants "consistently cited social interaction as a motivation for

[129] Buying to Belong, *supra* note 7, at 39.
[130] Robux cannot be earned through time spent on Roblox, but layered currencies within experiences can.
[131] Buying to Belong, *supra* note 7, at 24.
[132] Zara Abrams, *Why young brains are especially vulnerable to social media* (Aug. 3, 2023), https://www.apa.org/news/apa/2022/social-media-children-teens.
[133] *Respect & Social Status*, UCLA Center for the Developing Adolescent (2025), https://developingadolescent.semel.ucla.edu/core-science-of-adolescence/respect-and-social-status (citing Sibel Altikulaç et al., *Age and Gender Effects in Sensitivity to Social Rewards in Adolescents and Young Adults*, 13 Frontiers in Behavioral Neuroscience (2019), https://www.frontiersin.org/journals/behavioral-neuroscience/articles/10.3389/fnbeh.2019.00171/full).
[134] Zara Abrams, *Why young brains are especially vulnerable to social media,* American Psychological Association (Aug. 3, 2023), https://www.apa.org/news/apa/2022/social-media-children-teens.

spending time on social gaming platforms like Roblox and Fortnite."[135] As Roblox's young users are engaging in developmental work to understand themselves, they place deep importance on their virtual avatars. Fairplay's focus group participants said they like customizing their avatars to "look 'like you normally do'" to reflect the "real you," while uncustomized avatars are criticized for being a "default" or "noob."[136]

Scarcity marketing tactics feed these social pressures by making some items more special or desirable than others. As children navigate Roblox's social dynamics, they are highly aware of the status symbols that will help them fit in or become popular. Participants told Fairplay researchers that the best things on the platform must be bought. "Even though participants often said that they enjoyed 'earning' items … they also agreed that the best items (which were also often the most expensive items) were only available for purchase."[137] When scarcity marketing tactics clearly identify an item as rare, it increases the potential social benefit of owning it. "Public awareness of an item's limited availability can increase the motivation to buy by supporting the belief that owning the item in question can increase a player's social status in the game."[138] Further, scarcity marketing tactics take advantage of children's FOMO ("fear of missing out") and a related cognitive bias, loss aversion. Research on loss aversion shows "people perceive the pain of losing or missing out as two times worse than the satisfaction of gaining."[139] All of these factors lead children to place great weight on particularly rare items in Roblox. Indeed, when a Fairplay researcher purchased the Korblox Deathspeaker bundle of avatar clothes for 17,000 Robux (over $200 USD[140]), other Roblox players immediately began congratulating and complimenting the researcher.[141]

Roblox's use of visible inventories compounds this effect by allowing children to inspect what other players on the platform own. After purchasing the Korblox Deathspeaker bundle, Fairplay's researcher found that some players inspected her inventory to confirm the items' authenticity *before* congratulating her on owning it.[142] This design feature brings the playground pressures of having the "right" sneakers or hoodie into the digital world, where a player's "closet" is always on display — but in this case, it's an inventory of items that are intangible and valueless in the real world.

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[135] Buying to Belong, *supra* note 7, at 22.
[136] Buying to Belong, *supra* note 7, at 22, 25.
[137] Buying to Belong, *supra* note 7, at 25.
[138] Buying to Belong, *supra* note 7, at 37.
[139] Buying to Belong, *supra* note 7, at 19, *(Citing* Jen Cardello, *Scarcity Principle: Making Users Click RIGHT NOW or Lose Out*, Nielsen Norman Group (Sep. 14, 2014), https://www.nngroup.com/articles/scarcity-principle-ux/).
[140] Exact price depends on the Robux conversion rate and purchase method at the time of purchase.
[141] Buying to Belong, *supra* note 7, at 25.
[142] *Id.*

Accordingly, we urge the FTC to investigate Roblox's conduct in marketing virtual currencies and virtual assets to children as unfair in violation of Section 5 of the FTC Act.

V. Roblox's use of engagement-maximizing design features is unfair in violation of Section 5 of the FTC Act.

Roblox uses engagement-maximizing design features to increase children's time, activity, and money spent on the platform. In addition to using manufactured scarcity and visible inventories to drive virtual asset sales, the company allows developers to sell variable rewards, including lootboxes and wheel spins, capitalizing on traditional gambling psychology to tempt children to buy random virtual items. In addition, streaks and other rewards for time spent incentivize children to return to the platform frequently, encouraging compulsive use. These engagement-maximizing design techniques are unfair as to children in violation of Section 5 of the FTC Act. The use of these techniques on children results in substantial injuries, none of which are outweighed by any alleged benefit to consumers or competition. Children cannot reasonably avoid being injured by these techniques, which are designed to capitalize on the cognitive skills they are actively developing until they reach adulthood.

A. Roblox's use of engagement-maximizing design features results in substantial injury to young users.

As Fairplay has described in previous submissions to the Commission, engagement-maximizing design is at odds with children's health development and well-being.[143] It leads to financial harm, and it increases children's risk of problematic internet use, which is in turn associated with mental and physical health harms. Design features that maximize for engagement displace learning and other developmental activities that are essential to children's well-being. And maximizing a child's time online also increases their likelihood of contact with unknown users and therefore their susceptibility to predation and abuse.

As described in the Section above, children and their families experience substantial financial harm on Roblox. Just as the platform's currency and overall economic design contribute to these harms, so do its engagement-maximizing features, which encourage young users to spend money early and often. Lootboxes and other variable rewards push children to make purchases in hopes of obtaining highly valuable

[143] *See generally* Center for Digital Democracy, Fairplay et al., *Petition for Rulemaking to Prohibit the Use on Children of Design Features that Maximize for Engagement*, 13 (filed Nov. 17, 2022). https://www.ftc.gov/system/files/ftc_gov/pdf/R307000_RULE_MAKING_PETITION_TO_PROHIBIT_THE%20_USE_ON_CHILDREN_OF_DESIGN_FEATURES.pdf. [hereinafter *Petition for Rulemaking*].

virtual assets. Streaks and other rewards for time spent prolong a child's time on the platform, increasing their exposure to virtual asset marketing. Extended time on the platform may also result in a child earning "free" virtual currency in an experience that they then feel compelled to supplement by buying enough currency to make a purchase, as described above.

Engagement-maximizing design also has the potential to foster compulsive or "problematic internet use," which psychologists have described as excessive internet activity characterized by impulsivity, compulsion, or addiction.[144]

> Engagement-maximizing designs encourage problematic internet use by employing intermittent variable rewards, which orchestrate feedback loops to drive compulsive use… Scarcity marketing tactics further amplify the effects of variable rewards, by leveraging FOMO to motivate players to stay engaged with the platform. Scarcity marketing capitalizes on adolescents' heightened reward sensitivity and their developmental challenges with impulse control and decision-making… Features like rotating virtual asset shops tap into adolescents' predisposition toward novelty, while countdown clocks intensify the emotional impact of these tactics, creating pressure to buy now or start grinding. Especially for players who have little to no virtual currency, the pressure to grind for valuable assets leads players to spend hours and hours online to keep up with other players who can simply pay to win or collect.

Compulsive or problematic internet use is associated in turn with a range of harms, including "impaired cognitive development in areas relating to attention, memory and decision-making."[145] Studies have underscored the connection between screen time and mental well-being: "A 2019 meta-analysis of peer-reviewed research found 'firm evidence' that excessive screen use is associated with lower inhibition control, poorer working memory, and trouble with decisionmaking."[146] These studies align with teens' reports of their own well-being. A 2025 CDC survey found that teens who reported high daily screen time (defined as 4 hours or more per day of non-school-related screen time) were more likely to report symptoms of anxiety and depression.[147] Engagement-

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[144] Chloe Wilkinson et al., *Screen Time: The Effects on Children's Emotional, Social, and Cognitive Development,* Koi Tu Centre for Informed Future (Apr. 4, 2021) at 6, https://informedfutures.org/wp-content/uploads/pdf/Screen-time-The-effects-on-childrens-emotional-social-cognitive-development.pdf.

[145] *Id.*

[146] Buying to Belong *supra* note 7, at 43, (citing (FN193) Ioannidis, Konstantinos et al., Cognitive Deficits in Problematic Internet Use: Meta-Analysis of 40 Studies, 215 Br. J. Psychiatry 639, 639-645, https://pubmed.ncbi.nlm.nih.gov/30784392/).

[147] Benjamin Zablotsky et al., *Associations Between Screen Time Use and Health Outcomes Among Us Teenagers,* 22 Prev Chronic Dis, (Jul. 10, 2025), lhttps://www.cdc.gov/pcd/issues/2025/24_0537.htm.

maximizing features also increase social and emotional pressures on young users, which in turn "can lead to chronic stress, sleep deprivation, and a distorted sense of reality."[148]

Roblox's engagement-maximizing features also harm children by displacing sleep and replacing it with more time online. As Fairplay has previously outlined before the Commission, screen time disrupts sleep

> because it is impossible to be online and sleep at the same time, because stimulation before bedtime disrupts sleep patterns, and because [engagement-maximizing design features] make users feel pressured to be connected constantly, and that feeling doesn't always go away at nighttime.[149]

Sleep is essential to healthy development at every stage of childhood.[150] Sleep is directly associated with brain development,[151] and studies of adolescents have shown that reducing screen time before bed has been demonstrated to improve their sleep at night and ability to function during the day.[152] Excessive screen time can disrupt sleep by displacing habits and activities that promote good sleep, such as exercise.[153] Video games specifically can disrupt sleep by making a child more alert or increasing their heart rate.[154]

Further, when children's time and attention are captured by platforms designed to maximize their engagement, they also lose out on critical opportunities for psychological, social, and emotional development, including through high quality offline play and social interaction. Such design features increase screen time in general, which often comes at the expense of multi-sensory play and meaningful interactions with trusted adults and familiar peers. For younger children, displacement of these activities is correlated with delayed development of communication skills, self-regulation,

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[148] Buying to Belong *supra* note 7, at 43 (citing FN 192).
[149] *Petition for Rulemaking*, *supra* note 143 at 13.
[150] Shalini Paruthi et al., *Recommended Amount of Sleep for Pediatric Populations: A Consensus Statement of the American Academy of Sleep Medicine,* 12 Journal of Clinical Sleep Medicine 785, 785-786 (Jun. 15, 2016), https://jcsm.aasm.org/doi/10.5664/jcsm.5866#d1e313.
[151] Eva H. Tezler et al., *Sleep variability in adolescence is associated with altered brain development,* 14 Developmental Cognitive Neuroscience 16, 16-22 (Aug. 2015), https://www.sciencedirect.com/science/article/pii/S1878929315000547?via%3Dihub.
[152] Aurore A. Perrault et al., *Reducing the use of screen electronic devices in the evening is associated with improved sleep and daytime vigilance in adolescents,* 42 Sleep 9, (Jun. 8, 2019), https://academic.oup.com/sleep/article-abstract/42/9/zsz125/5513278?redirectedFrom=fulltext.
[153] Kyle Gomez and Ran D. Goldman, *Screen time and sleep in children,* 6 Can Fam Physician 388, 388-390 (Jun. 2024), https://pmc.ncbi.nlm.nih.gov/articles/PMC11280700/.
[154] American Academy of Pediatrics, *Screen Time Affecting Sleep,* Center of Excellence Social Media and Youth Mental Health (Oct. 18, 2023), https://www.aap.org/en/patient-care/media-and-children/center-of-excellence-on-social-media-and-youth-mental-health/qa-portal/qa-portal-library/qa-portal-library-questions/screen-time-affecting-sleep.

resilience and problem solving.[155] When children reach adolescence and their social experiences are dictated by Roblox's predatory economy, they become deprived of the necessary human-to-human feedback they need to develop their identities.[156] The displacement of such activities is heavily correlated to degrading mental health.[157]

Finally, maximizing children's time online increases the likelihood that they will encounter harmful adults and be subject to exploitation or abuse. As described in detail in Section III, above, children have experienced grooming and abuse on Roblox for years. Incentivizing children to extend their time on a platform where they can easily be contacted by unknown adults increases their chances of experiencing exploitation and abuse.

B. The substantial injury caused by Roblox's engagement-maximizing design features is not outweighed by benefits to consumers or competition.

When the Commission evaluates harmful practices under its authority to prohibit unfair practices, it considers any benefits to consumers or competition as a result of the practice, as well as costs of the proposed remedy, and weighs them against the injury to consumers.[158] The harms of Roblox's engagement-maximizing design described above far outweigh any minimal benefit to consumers or competition. These choices benefit Roblox at children's and family's expense. Just as with Roblox's virtual currency and virtual asset marketing, these design choices incentivize a race to the bottom in the market, encouraging competitors to build gaming platforms that are designed to maximize user engagement at the expense of their own choices and well-being. This conduct does not benefit competition.

C. Children cannot reasonably avoid being injured by Roblox's engagement-maximizing design features.

Children have specific developmental characteristics that make it unreasonable for them to avoid injury from Roblox's engagement-maximizing design features. For typically developing children, their executive function capabilities, including important skills like impulse control, planning, and filtering distractions, are not yet mature and won't be until well into their 20s. As they reach adolescence, children are also particularly sensitive to social rewards, which come into play heavily on Roblox. Finally,

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[155]Sudheer K Muppalla et al., *Effects of Excessive Screen Time on Child Development: An Updated Review and Strategies for Management,* 15 Cureus, (Jun. 18, 2023), doi: 10.7759/cureus.40608.
[156] Buying to Belong, *supra* note 7, at 9-11.
[157]*See* Jonathan Haidt, *The Anxious Generation: How the Great Rewiring of Childhood is Causing an Epidemic of Mental Illness* (Penguin 2024).
[158] *FTC Policy Statement on Unfairness*, Federal Trade Commission (Dec. 17, 1980), https://www.ftc.gov/legal-library/browse/ftc-policy-statement-unfairness.

Roblox leverages variable reward psychology to make lootboxes and wheels of chance particularly appealing, and these sophisticated design techniques are difficult for children to defend against.

1. Immature executive function

As Fairplay has described in previous submissions to the Commission, perhaps the most important reason that children cannot reasonably avoid design features that maximize for their engagement is because their executive functions are not yet mature.[159] Executive functioning is a set of related cognitive abilities that are critical to directing attention and behavior,[160] especially in an online environment. Because of its role in filtering distractions, prioritizing tasks, and setting goals, the area of the brain involved in executive functioning is commonly referred to as the brain's air traffic controller.[161] Cognitive abilities associated with executive functioning include impulse control, decision-making, attentional flexibility, planning, self-regulation, and resistance to interference.[162] These are not fully developed until adulthood.[163] Impulse control in particular is a key executive function skill when it comes to engagement-maximizing design features. As the American Psychological Association explains, "Youths' developing cortical system (particularly in the brain's inhibitory control network) makes them less capable of resisting impulses or stopping themselves from behavior that may lead to temporary benefit despite negative longer-term consequences."[164]

Roblox's engagement-maximizing design techniques capitalize on these vulnerabilities to encourage children to spend more time and money on the platform. Scarcity marketing tactics that limit the quantity of a given virtual item or the amount of

[159] *See generally Petition for Rulemaking*, *supra* note 143.
[160] Timothy D. Nelson et al., *Executive control throughout elementary school: Factor structure and associations with early childhood executive control*, 58 Developmental Psych. 730, 730 (2022), https://pubmed.ncbi.nlm.nih.gov/35343719/#full-view-affiliation-1; Philip D. Zelazo et al., *Executive Function: Implication for Education*, Nat'l Ctr. for Educ. and Res. at 1 (2017), https://ies.ed.gov/ncer/pubs/20172000/pdf/20172000.pdf.
[161] Center on the Developing Child, *A Guide to Executive Function*, Harvard University (2025), https://developingchild.harvard.edu/science/key-concepts/executive-function; Leanda Barrington-Leach, *How Children Think and How Persuasive Design Tech Can and Does Exploit Their Vulnerabilities*, LinkedIn (May 18, 2021), https://www.linkedin.com/pulse/how-childrenthink-persuasive-design-tech-can-does-barrington-leach.
[162] Louis L. Moses & Dare A. Baldwin, *What Can the Study of Cognitive Development Reveal About Children's Ability to Appreciate and Cope with Advertising?*, 24 J. Pub. Pol'y & Mktg. 186, 194 (2005).
[163] Heather J. Ferguson et al., *The Developmental Trajectories of Executive Function from Adolescence to Old Age*, 11 Sci. Rep. 1382, (2021), https://www.nature.com/articles/s41598-020-80866-1.pdf.
[164] Mary Ann McCabe et al., *Potential risks of content, features, and functions: The science of how social media affects youth*, American Psychological Association (Apr. 2024), https://www.apa.org/topics/social-media-internet/youth-social-media-2024 (citing Hartley, C. A., & Somerville, L. H., *The neuroscience of adolescent decision-making*, 5 Current Opinion in Behavioral Sciences 108, 108–115 (Oct. 2015), https://doi.org/10.1016/j.cobeha.2015.09.004).

time it is on sale make purchases feel urgent, overwhelming young users' burgeoning impulse control and encouraging overspending. As one adolescent focus group participant said in *Buying to Belong*, "What if you decide later on that you should have bought [a limited item] and you can't? You know it's like there's this sort of, like, pressure to stay on top of, like, the, like, best items or whatever."[165] Indeed, after Roblox introduced limited items in 2023, the company reported a 15% increase in revenue.[166] Streaks and other rewards for time spent encourage children similarly capitalize on children's immature impulse control functions, encouraging them to return to Roblox experiences habitually and stay on them longer.

Young children, whose cognitive control is naturally less developed, are attracted to rewards for the immediate gratification and the potential of collecting more, exciting prizes. Each reward triggers the release of dopamine. Too frequent triggering can lead to habit formation, pushing them to keep returning to the game or have trouble disengaging.[167] The onslaught of constant rewards not only preys on children's immature impulse control, but can wire a child's brain to expect rewards for mundane tasks, reducing resiliency and problem solving in the face of challenges.[168]

While they are still developing their cognitive control systems, minors (especially teenagers) are more likely to engage in sensation- and reward-seeking behaviors, making them further susceptible to engagement-maximizing design features.

> Starting in early adolescence, there is a significant increase in brain activity related to the neurotransmitter dopamine. This contributes to teens' tendency to seek out experiences motivated by rewarded stimuli, as well as their experience of heightened arousal in response to rewards.... Further, adolescents are particularly susceptible to immediate rewards, such as those granted instantly in a virtual environment. According to the American Psychological Association, the American Psychiatric Association, and the National Association of Social Workers, teens are "emotionally primed for spur-of-the-moment, reward- and

[165] *Buying to Belong*, *supra* note 7, at 32.
[166] Cole Watson, *Roblox posts 15% spike in Q2 revenue*, kidscreen (Aug. 9, 2023), https://kidscreen.com/2023/08/09/roblox-posts-15-spike-in-q2-revenue/.
[167] Sarvajith Kumar J. N. and Manohar N., *Dopamine Loops and Player Retention: A Study on Reinforcement in Free-to-Play Games*, 4 Journal of Communication and Management 56, 56-61 (2025) https://www.jcoma.com/index.php/JCM/article/view/352.
[168] Gabe Zichermann and Christopher Cunningham, *Gamification by design: Implementing game mechanics in web and mobile apps* (O'Reilly Media, 1st ed. 2011); Edward L. Deci et al., *Extrinsic Rewards and Intrinsic Motivation in Education: Reconsidered Once Again*, 71 Review of Educational Research 1, 1-27 (2001), https://doi.org/10.3102/00346543071001001.

> sensation-seeking behavior without offsetting adult sensitivities to corresponding risks and longer-term consequences."[169]

Ultimately, children do not yet have the executive function skills that are critical to overcoming Roblox's engagement-maximizing design features in order to limit the time and money they spend on the platform.

2. Sensitivity to social rewards

Another reason children cannot avoid injuries from Roblox's engagement-maximizing features is because they are particularly sensitive to social rewards, especially in adolescence. Changes in areas of the brain related to social cognition, emotional regulation, decision-making, and impulse control make adolescents much more susceptible to social rewards than adults.[170] The brain begins changing between the ages of 10-12 as children grow more receptors for hormones that "make social rewards—compliments on a new hairstyle, laughter from a classmate—start to feel a lot more satisfying."[171] During this period, adolescents become more attuned to social status, and "[f]eeling rewarded from positive attention appears to peak."[172] By contrast, an adult's more mature prefrontal cortex and established sense of self helps regulate their response to social rewards.[173]

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[169] *Petition for Rulemaking*, *supra* note 143, at 56-57 (citing Brief for the American Psychological Association, the American Psychiatric Association, and the National Association of Social Workers as Amici Curiae in Support of Petitioners, *Miller v. Alabama*, 132 S. Ct. 2455, 2464–65 (2012) (Nos. 10-9646, 10-9647)).
Adriana Galvan, *Adolescent Development of the Reward System*, 4 Frontiers Hum. Neuroscience 1, 1 (2010); Eveline A. Crone, E*xecutive Functions in Adolescence: Inferences from Brain and Behavior*, 12 Developmental Science 825, 829 (2009) ("Given the important role of dopamine in the brain's reward circuitry, this redistribution of dopamine receptors may increase reward-seeking behavior in puberty and therefore affect executive functions."); Sihan Liu et al., C*ore Symptoms and Symptom Relationship of Problematic Internet Use Across Early, Middle, and Late Adolescence: A Network Analysis*, 128 Computers Hum. Behav. 2 (2022) doi: 10.1016/j.chb.2021.107090. (explaining that early adolescents may become enthusiastic adopters of the Internet due to their sensation-seeking tendencies); Laurence Steinberg et al., *Age Differences in Future Orientation and Delay Discounting*, 80 Child Dev. 28, 39 (2009) doi: 10.1111/j.1467-8624.2008.01244.x; Brief for the American Psychological Association, the American Psychiatric Association, and the National Association of Social Workers as Amici Curiae Supporting Petitioners, Miller v. Alabama, 132 S. Ct. 2455, 2464–65 (2012) (Nos. 10-9646, 10-9647)).
[170] *Buying to Belong*, *supra* note 7, at 24.
[171] Zara Abrams, *Why young brains are especially vulnerable to social media,* American Psychological Association (Aug. 3, 2023), https://www.apa.org/news/apa/2022/social-media-children-teens
[172] *Respect & Social Status*, UCLA Center for the Developing Adolescent (2025), https://developingadolescent.semel.ucla.edu/core-science-of-adolescence/respect-and-social-status (citing Sibel Altikulaç et al., *Age and Gender Effects in Sensitivity to Social Rewards in Adolescents and Young Adults*, 13 Frontiers in Behavioral Neuroscience (2019), https://www.frontiersin.org/journals/behavioral-neuroscience/articles/10.3389/fnbeh.2019.00171/full).
[173] Zara Abrams, *Why young brains are especially vulnerable to social media*, American Psychological Association (Aug. 3, 2023), https://www.apa.org/news/apa/2022/social-media-children-teens.

Focus group data from *Buying to Belong* underscores the fact that young users see Roblox as a social space where they can experiment with expressing themselves. Participants "consistently cited social interaction as a motivation for spending time on social gaming platforms like Roblox and Fortnite."[174] As Roblox's young users are engaging in developmental work to understand themselves, they place deep importance on their virtual avatars.

Scarcity marketing tactics feed these social pressures by making some items more special or desirable than others. As children navigate Roblox's social dynamics, they are highly aware of the status symbols that will help them fit in or become popular. Participants told Fairplay researchers that the best things on the platform must be bought. "Even though participants often said that they enjoyed 'earning' items… they also agreed that the best items (which were also often the most expensive items) were only available for purchase."[175] When scarcity marketing tactics clearly identify an item as rare, it increases the potential social benefit of owning it. "Public awareness of an item's limited availability can increase the motivation to buy by supporting the belief that owning the item in question can increase a player's social status in the game."[176] The compound effect of both scarcity marketing and visible inventories is evident in the scenario described in Section I(B) where a Fairplay researcher bought an expensive Korblox Deathspeaker bundle of avatar clothes and immediately experienced other players inspecting it and complimenting it.[177]

3. Psychology of variable rewards

Another reason children cannot avoid injury in this context is because Roblox utilizes sophisticated variable reward psychology through its lootboxes and wheels of chance to keep children paying and playing for rewards. These features allow children to pay to open a box or spin a wheel for a chance at a reward. As described above, the rarest and most appealing rewards are heavily advertised, but the chance a child actually receives the most "valuable" reward possible is often extremely slim.

The design of these casino-like features is highly intentional. Experiments conducted in the 20th Century revealed that research subjects would engage in an action for a longer period of time if the reward they receive for the action is unpredictable

[174] *Buying to Belong*, *supra* note 7, at 22.
[175] *Buying to Belong*, *supra* note 7, at 22.
[176] *Buying to Belong*, *supra* note 7, at 37.
[177] *Buying to Belong*, *supra* note 7, at 25.

rather than consistent.[178] Neurologically, this is because the brain releases more dopamine in response to uncertain rewards than it does in response to consistent ones.[179] In the online context, product designers have applied this research to drive user engagement. Consumer psychology and tech design expert Nir Eyal outlines in detail the way companies can use these variable reward feedback loops to hook users on their products.[180] On gaming platforms, variable rewards create a "Vegas Effect," exposing children to gambling-like experiences.[181] Unsurprisingly, research demonstrates a connection between lootboxes and problem gambling behaviors.[182] Children cannot be reasonably expected to avoid these sophisticated techniques.

We urge the FTC to investigate Roblox's use of engagement-maximizing design features as unfair in violation of Section 5 of the FTC Act.

Section 5 Deception Claims

VI. Roblox has made deceptive representations about the platform's safety features and developmental appropriateness in violation of Section 5 of the FTC Act.

The FTC's Policy Statement on Deception sets out a three-part test. First, the Commission assesses whether there has been a representation, omission, or practice that is likely to mislead the consumer.[183] Second, the Commission examines the practice from the perspective of a consumer acting reasonably under the circumstances.[184] Where the representation is directed to a particular group, it examines the practice from the

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[178] B. F. Skinner, *Two Types of Conditioned Reflex: A Reply to Konorski and Miller*, 16 J. Gen. Psychology 272, 272-279 (1937), https://doi.org/10.1080/00221309.1937.9917951; *see also* J. E. Staddon & D. T. Cerutti, *Operant Conditioning*, 54 Annual Review of Psychology 115, 115–144 (2003), https://doi.org/10.1146/annurev.psych.54.101601.145124.

[179] Anna Hartford & Dan J. Stein, Attentional Harms and Digital Inequalities, 9 JMIR Mental Health 2, 3 (Feb. 11, 2022), https://pubmed.ncbi.nlm.nih.gov/35147504/.

[180] Nir Eyal, *The Hook Model: How to Manufacture Desire in 4 Steps*, Nir and Far (2026), https://www.nirandfar.com/how-to-manufacture-desire/.

[181] Mike Brooks, *The "Vegas Effect" of Our Screens*, Psychol. Today (Jan. 4, 2019), https://www.psychologytoday.com/us/blog/tech-happy-life/201901/the-vegas-effect-our-screens.

[182] Stuart Gordon Spicer et al., *Loot boxes and problem gambling: Investigating the "gateway hypothesis,"* 131 Addictive Behaviors 107327, (Aug. 2022), https://doi.org/10.1016/j.addbeh.2022.107327; James Close & Joanne Lloyd, *Lifting the Lid on Loot-Boxes: Chance-Based Purchases in Video Games and the Convergence of Gaming and Gambling*, GambleAware at 14, (2021), https://www.begambleaware.org/sites/default/files/2021-03/Gaming_and_Gambling_Report_Final.pdf; David Isaac Zendle et al., *Paying for loot boxes is linked to problem gambling, regardless of specific features such as cash-out and pay-to-win,* Computers in Human Behavior 181, 181-191 (Dec. 12, 2025), https://eprints.whiterose.ac.uk/148267.

[183] *FTC Policy Statement on Deception*, Federal Trade Commission (Oct. 14, 1983), https://www.ftc.gov/system/files/documents/public_statements/410531/831014deceptionstmt.pdf.

[184] *Id.*

perspective of that group.[185] The Commission then determines whether the representation, omission, or practice is material, i.e., whether it is likely to affect the consumer's conduct or decision with regard to a product or service.[186]

According to the Commission's prior statements, to be deceptive, "a representation, omission or practice must be likely to mislead reasonable consumers under the circumstances."[187] The test is whether the consumer's interpretation or reaction is reasonable.[188] In evaluating a particular practice, the Commission considers the totality of the practice in determining how reasonable consumers are likely to respond.[189] When representations or sales practices are targeted to a specific audience, such as children, the elderly, or the terminally ill, the Commission determines the effect of the practice on a reasonable member of that group.[190] The Commission will consider the full course of dealing when determining how reasonable consumers are likely to respond to a series of claims or misleading statements. It examines "the entire mosaic, rather than each tile separately."[191] That means the Commission considers the impression made as a whole, even if a "crafty" advertiser includes general disclaimers about its messaging or couches its claims as opinion rather than factual assertions.[192]

While the unfairness discussions above focused on the Roblox experience from the perspective of the children using the platform, this section is focused on how the company's representations mislead parents and other primary caregivers. Parents are the primary audience for Roblox's representations regarding its safety and age-appropriateness and parental controls. These representations are likely to mislead parents acting reasonably under the circumstances, and they are likely to affect parents' decisions about whether to let their children use Roblox.

A. Roblox's statements and representations about the platform's safety features and developmental appropriateness are likely to mislead parents acting reasonably under the circumstances.

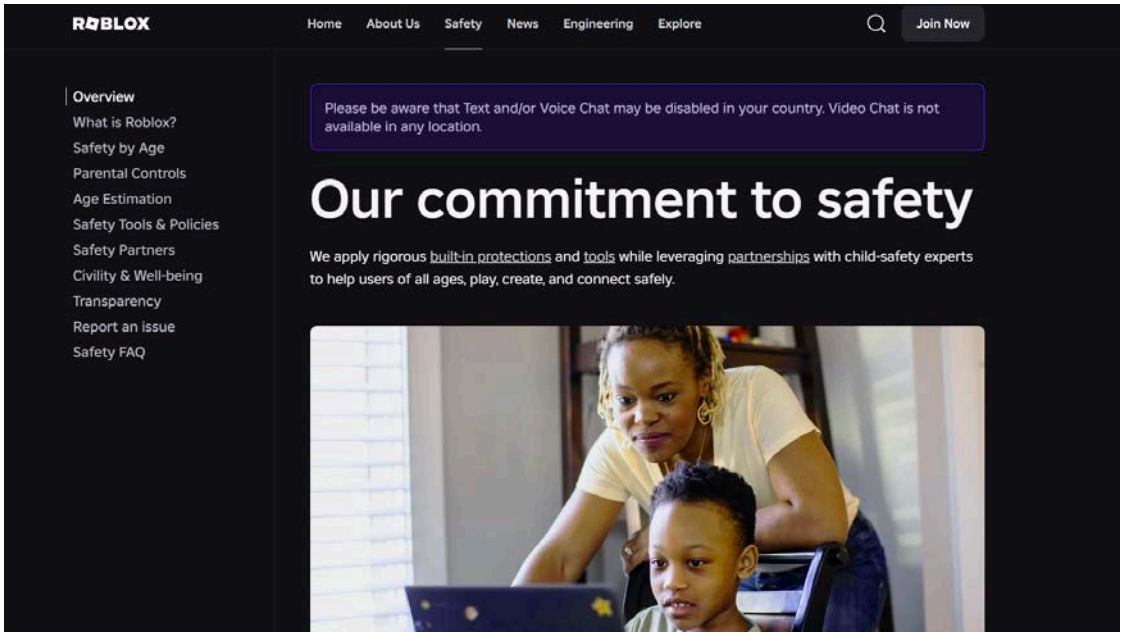
Robox has consistently made misleading statements about the safety of its platforms and the effectiveness of its safety features and parental tools, branding itself

[185] *Id.*
[186] *FTC Policy Statement on Deception*, Federal Trade Commission (Oct. 14, 1983), https://www.ftc.gov/system/files/documents/public_statements/410531/831014deceptionstmt.pdf.
[187] *Id.*
[188] *Id.*
[189] *FTC Policy Statement on Deception*, Federal Trade Commission (Oct. 14, 1983), https://www.ftc.gov/system/files/documents/public_statements/410531/831014deceptionstmt.pdf.
[190] *Id.*
[191] FTC v. Sterling Drug, 317 F.2d 669, 674 (2d Cir. 1963).
[192] *FTC Policy Statement on Deception*, Federal Trade Commission (Oct. 14, 1983), https://www.ftc.gov/system/files/documents/public_statements/410531/831014deceptionstmt.pdf.

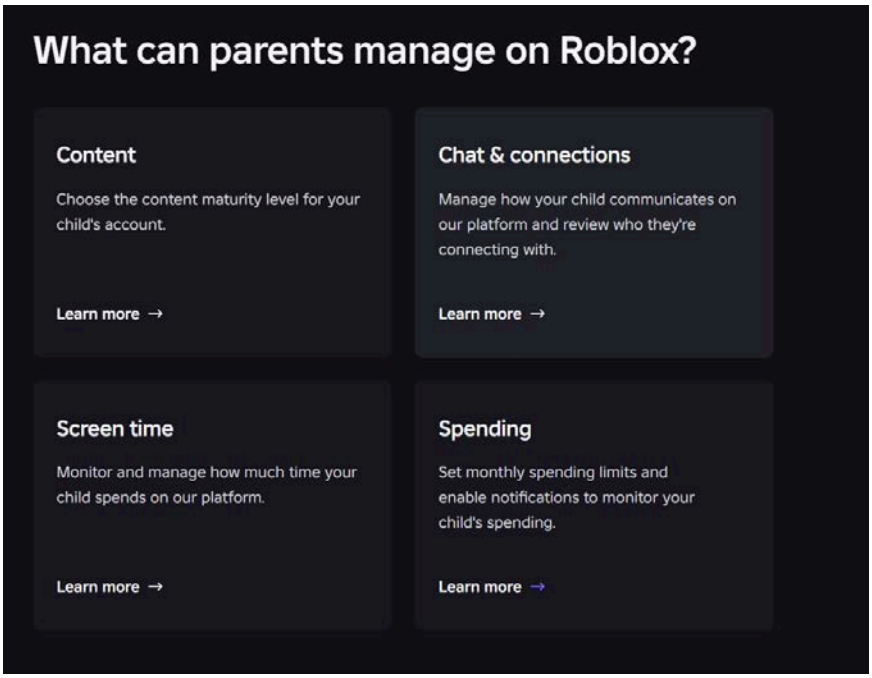
as a walled garden where children can play safely. These statements have misled families into believing that Roblox's safeguards generally protect children from being contacted by strangers, including harmful adults. In reality, children face significant risks of predation, exploitation, and abuse via Roblox's chat and communication design features. Roblox also bills itself as an overall age-appropriate experience for children, but this also misleads parents because its design features pose a wide range of serious financial and mental health harms.

Roblox's website markets its platform as safe and developmentally appropriate for children. One of its webpage headlines reads "safe settings for all ages."[193] It boasts about building "close relationships with a wide range of organizations to help support wellness and safety…" and working with experts "to create educational resources for parents, caregivers, and our users to help them navigate the online world safely and confidently."[194] Roblox proclaims that its vision is to "set the standard for online safety, with rigorous built-in protections and safety systems to help keep every user secure."[195] Roblox also capitalizes on its safety features to differentiate itself against its competitors, assuring parents that "Roblox is fundamentally different from other platforms" because it "builds safety features with [under 13 users] in mind."[196]

[193] *Safer Settings for all Ages,* Roblox Safety, https://about.roblox.com/safety-by-age (last visited Feb. 20, 2026).
[194] *Parent & Caregiver Guide to Roblox,* Roblox family guides, 9, https://about.roblox.com/pdf/parent-caregiver-guide-to-roblox (last visited Feb. 20, 2026).
[195] *Safety Tools and Policies,* Roblox, *https://about.roblox.com/safety-tools* (last visited Feb. 20, 2026).
[196] *Safety FAQ,* Roblox Safety, https://about.roblox.com/safety-faqs (last visited Feb. 20, 2026).



Roblox's safety home page describes the platform's commitment to protections and tools to keep children safe.[197]



Roblox says that parents can control content, chat, screen time, and spending. As this Request for Investigation demonstrates, control of all of these elements is undermined by the platform's design.[198]

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[197] *Our Commitment to safety,* Roblox Safety, https://about.roblox.com/safety, (last visited Feb. 6, 2026).
[198] *Parental Controls,* Roblox Safety, https://about.roblox.com/parental-controls (last visited Feb. 6, 2026).

In press releases and blog posts, Roblox assures parents that it protects the platform's users. In a representative blog post, the company claims that "safety and civility have been [its] core values from the very beginning and drive everything [it does]."[199] It says Roblox has a "zero tolerance" policy for "inappropriate content and behavior" and that it will "take swift and immediate action to address any content or developer that violates [its] terms of use, including any attempt to go around [its] safety policies and protocols."[200] It claims that it is "always strengthening [its] systems to make Roblox even safer." Roblox also espouses a commitment to "maintain an economy that is efficient, supportive, and fair" and to "take action to prevent abuse of our economy."[201]

These assurances have been echoed by Roblox's executives. In a 2024 interview, CEO David Baszucki told parents that "Roblox has strong controls in place, and is constantly scanning all of the content on the site, immediately taking down things that are not appropriate."[202] He claimed that the platform has "robust safety protocols" that are "essential to fostering age-differentiated experiences."[203] He has staked much of Roblox's brand on safety, going so far as to explicitly claim in 2025 that "Roblox is the safest place for anyone on the internet."[204] Other Roblox executives have made similar statements. Roblox Chief Safety Officer Matt Kaufman wrote on the company's website in 2024 that "safety is and always has been foundational to everything we do at Roblox."[205] He also said that Roblox has a "track record of putting the safety of the youngest and most vulnerable people on our platform first."[206] And he assured parents that Roblox "has spent almost two decades working to make the platform one of the safest online environments for our users" especially for its "youngest users."[207]

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[199] *Supporting and Protecting the Roblox Developer and User Community,* Roblox Newsroom (Feb. 4, 2022), https://about.roblox.com/newsroom/2022/02/supporting-protecting-roblox-developer-user-communit.
[200] *Id.*
[201] *Id.*
[202] CNBC Television, *Roblox CEO on new safety updates following October Hindenburg report,* YouTube (Nov. 19, 2024), https://youtu.be/g8UBz_1lis8?si=lBvhaInGoNeB7_xo.
[203] David Baszucki, *Our Vision for All Ages,* Roblox Newsroom (May 17, 2023), https://corp.roblox.com/newsroom/2023/05/our-vision-for-all-ages.
[204] Scott Tong and James Perkins Mastromarino, *Roblox CEO on platform's safety efforts as Congress works to protect kids online,* wbur (Jul. 23, 2025), https://www.wbur.org/hereandnow/2025/07/23/roblox-ceo-david-baszucki.
[205] Matt Kaufman, *Driving Civility and Safety for All Users,* Roblox Newsroom (Jul. 22, 2024), https://corp.roblox.com/newsroom/2024/07/driving-civility-and-safety-for-all-users.
[206] *Id.*
[207] Matt Kaufman, *Major Updates to Our Safety Systems and Parental Controls,* Roblox Newsroom (Nov. 18, 2024), https://corp.roblox.com/newsroom/2024/11/major-updates-to-our-safety-systems-and-parental-controls.

Roblox's Vice President of Civility and Partnership Tami Bhaumik told parents in 2024 that Roblox will "make sure our players can learn, create, and play safely" and that it's the platform's "most important priority and that will never change."[208] These are just a fraction of public statements Roblox and its leadership have made about the safety of its platform. Taken together, the company's representations create an overwhelming impression that Roblox is a walled garden where children are protected from harm and parents are empowered to control their family's experience on the platform. These representations are likely to mislead parents into believing that Roblox is a safe, developmentally appropriate platform that protects children from harmful contacts with abusive and exploitative adults.

However, Roblox is not the walled garden it is made out to be. As discussed above, Roblox designs its platform to extract as much time and money from its users as it can. Manipulative design features like visible inventories, scarcity marketing, and time-based rewards put intense pressure on young users to purchase more and more virtual items. While the use of overlapping virtual currencies, lootboxes, bundled pricing, and everchanging exchange rates deceive young users into spending more money than they realize. These design decisions can cause significant financial harm, encourage compulsive use, and negatively impact mental health.

In addition, Roblox's representations about its chat communication safeguards are similarly likely to mislead parents acting reasonably. This year, Roblox announced new age verification requirements, and the company claims that in-experience chats are off by default for accounts registered to children under 9, and direct chat within experiences is off by default for children under 13. Roblox continues to market these controls as safety features that help parents protect their children from harmful and inappropriate contact on the platform. Roblox's current Safety FAQ states plainly that all users are required "to complete an age check to use chat features."[209] And its safety features page tells parents that "[c]ommunication controls allow you to determine who your child can chat with on Roblox."[210] However, as described in Section III, Roblox notes in the fine print that "These settings do not apply to chat features developed independently by developers." As a result of this exception, users under 13 are still able to chat with unknown adults in many experiences, as outlined above.

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[208] Ariel Zilber, *Roblox predator groomed 10-year-old girl, exchanging "Robux" currency for explicit photos: lawsuit,* New York Post (Aug. 22, 2025), https://nypost.com/2025/08/22/business/roblox-predator-lured-girl-10-with-robux-for-explicit-photos-lawsuit/).
[209] *Safety FAQ,* Roblox Safety, https://about.roblox.com/safety-faqs (last visited Feb. 20, 2026).
[210] *Parent & Caregiver Guide to Roblox*, Roblox Family Guides, https://about.roblox.com/resource/parent-caregiver-guide-to-roblox?section=parental-controls&article=communication-controls (last visited Feb. 20, 2026).

B. Roblox's misleading statements about the platform's safety features and developmental appropriateness are material.

The FTC considers the materiality of a deceptive statement by examining whether it is likely to affect consumer conduct.[211] "The Commission considers claims or omissions material if they significantly involve health, safety, or other areas with which a reasonable consumer would be concerned. Depending on the facts, information pertaining to the central characteristics of the product or service will be presumed material."[212]

Roblox's misleading statements are material because they relate to a core concern of parents — the safety of their children online. A qualitative research survey on Roblox found that many parents are concerned about safety on Roblox.[213] Parents surveyed cited specific concerns related to "their children chatting with adults, seeing adult content, falling for financial scams, and spending more time than necessary playing the game."[214] Further, parents are depending on Roblox to implement the appropriate safeguards to protect their children. A December 2025 survey found that 61% of parents who let their children play Roblox believe that Roblox safety tools are sufficient to prevent their child from being contacted by a predator.[215] There is no doubt that Roblox's representations about its platform safety impact parents' conduct in allowing their children to use it.

Moreover, Roblox itself positions its safety features and parental tools as a central characteristic of its platform and vital to its own user base. In a recent securities filing, Roblox explicitly stated that "[t]he success of our business model is contingent upon our ability to provide a safe online environment for children to experience."[216] Roblox explained that its "reputation as a safe and civil environment for children is very important to [its] success and if [it]…[is] perceived to be failing to protect users, [its] business will suffer."[217] That is because Roblox understands that its safety features are material to the company's "ability to attract and engage users."[218] If parents were aware

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[211] *FTC Policy Statement on Deception*, Federal Trade Commission (Oct. 14, 1983), https://www.ftc.gov/system/files/documents/public_statements/410531/831014deceptionstmt.pdf.
[212] Id at 5.
[213] Andrew Smithwick et al., *"Parent seeking Roblox Safety Help": Comparing Parental Roblox Concerns to Roblox Offerings*, 2024 IEEE International Symposium on Technology and Society (Sep. 2024), https://www.researchgate.net/publication/385374663_Parent_seeking_Roblox_Safety_Help_Comparing_Parental_Roblox_Concerns_to_Roblox_Offerings.
[214] Id.
[215] *The Illusion of Safety: How one Unchecked Box on Roblox Opens a World of Risk,* A Case for Women (Dec. 10, 2025), https://www.acaseforwomen.com/blog/robloxs-parental-controls-under-fire/.
[216] Roblox, SEC *Registration Statement On Form S-1,* SEC (Nov. 19, 2020), https://www.sec.gov/Archives/edgar/data/1315098/000119312520298230/d87104ds1.htm.
[217] *Id.*
[218] *Id.*

of the substantial risks related to sexual exploitation, financial harm, and compulsive use that their children face on the platform, many would likely not allow their children to play Roblox.

Ultimately, Roblox's false and misleading statements about the safety of its platform and the effectiveness of its parental tools give parents acting reasonably under the circumstances a false sense of security about the platform's design and safety features. Its statements create a strong overall impression that Roblox is a safe space for children online, and that parents can trust Roblox to ensure that their children will not be subject to a significant risk of harm. This false impression is material to a parent's understanding of Roblox, as safety is often a parent's primary concern when deciding whether to let their child join the platform.

We urge the FTC to investigate Roblox to determine whether its representations regarding the safety and age-appropriateness of its platform and the effectiveness of its tools and safeguards related to voice and text chat are deceptive in violation of Section 5 of the FTC Act.

Conclusion

Based on the facts set forward in this Request for Investigation, we urge the FTC to scrutinize Roblox's design and business model and specifically, to pursue the following claims:

- Roblox's conduct in marketing virtual currencies and virtual assets to children as unfair in violation of Section 5 of the FTC Act.
- Roblox's use of engagement-maximizing design features as unfair in violation of Section 5 of the FTC Act.
- Roblox's representations about the platform's safety features and developmental appropriateness as deceptive in violation of Section 5 of the FTC Act.

It is clear that Roblox's complex virtual economy, which is explicitly designed for spending and interacting with strangers, poses serious risks to the child users that are invited to use it. As Roblox makes millions of dollars from children's activity on the platform, it exposes them to a maze of complex financial and marketing mechanisms that prey upon their developmental sensitivities and far exceed their understanding of financial concepts and statistics. All the while, harmful adults can groom and exploit children — while Roblox has made recent attempts to age gate certain voice and text chat capabilities, these measures contain significant loopholes. We urge the FTC to investigate and to protect the millions of children across the country who use Roblox.