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May 1, 2023

David Baszucki Founder and CEO, Roblox 970 Park Place, Suite 100 San Mateo, CA 94403

Re: Roblox placed on 2023 Dirty Dozen List for facilitating child sexual exploitation and abuse

Dear Mr. Baszucki.

We are writing to inform you that the National Center on Sexual Exploitation—a non-partisan nonprofit in Washington, DC dedicated to addressing the full spectrum of sexual exploitation—is placing Roblox on the annual Dirty Dozen List. The list, naming 12 major contributors to sexual exploitation and abuse, will be revealed on May 2.

For a platform with children under 13 comprising the largest demographic, Roblox should boast substantial, industry-leading safety measures to protect young users. Unfortunately, extensive evidence suggests that Roblox has not sufficiently prioritized child protection and has struggled to implement safety practices commensurate with its growth – resulting in a proliferation of exploitative and harmful content and predatory behavior.

Since Roblox's inception, you've known that your platform is used to target, groom, and abuse children. Numerous news outlets have covered the frequent reports of children being lured into dangerous situations by predators on Roblox. Law enforcement has spoken out continuously to warn parents of the risks on the app. There are thousands of videos on YouTube both warning of these dangers and recording the explicit activities. Parents post extensively on social media to alert other caregivers to watch out for their kids.

These threats to children on your platform are not new.

So how is it that Roblox still allows adult strangers to direct message and "friend" children – even with case after case of children being groomed and abused through your platform, like this 13-yearold boy who was recently kidnapped by a man he met on Roblox?²

- ⇒ How can it be possible that children are still accessing sexually explicit material? Roblox was recently <u>named a top five platform for child exposure to inappropriate sexual content</u>, according to a Parents Together report based on surveys with 1,000 parents.³
- ⇒ Why is it that while the tech industry is moving toward safety by design principles, a child's platform does not default to the highest safety settings...that a <u>five-year-old can sign up with no email or parental permission and access games where their character may be raped?</u>⁴

Instead of prioritizing meaningful child protection, Roblox instead has its sights set on expanding to an older audience and more "mature" content.

It is long past time for Roblox to *truly* place child protection at the forefront and to make your platform safe by default and design – rather than continuously pushing more of the burden onto <u>parents to try to monitor a platform with more than 40 million games</u>.⁵ And what about the children that don't have the privilege of involved, informed, available parents – the children already at greater risk for sexual exploitation? Roblox is leaving them to fend for themselves.

As the CEO, you have a grave responsibility for the well-being of the more than <u>33.6 million children under age 16 using your platform daily</u>, <u>12.3 million of whom are under age eight</u>, ⁶ if for nothing else than for the fact that a significant amount of your <u>\$2.2+ billion in revenue</u>⁷ comes from <u>your underage users</u>. ⁸

Child Sexual Abuse and Grooming of Children on Roblox

Child sexual abuse and grooming have long been a threat on Roblox. A simple Google search easily yields results about grooming and exploitation occurring on the platform. The following are just a few news stories about predatory adults accessing children through Roblox:

- In March 2023, a <u>40-year-old California man</u> was arrested after traveling across the country to sexually abuse a 14-year-old he met and groomed on Roblox.⁹
- In April 2023, a <u>14-year-old girl from Ohio</u> 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.¹⁰
- In 2022, <u>a thirteen-year-old girl</u> in Topeka was rescued from a man she met on Roblox who was sex trafficking her.¹¹
- In 2022, an <u>8-year-old girl in North Carolina</u> 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.¹²
- In 2022, a <u>Florida man</u> 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.¹³
- In 2022, a <u>13-year-old boy</u> was abducted from his home in Utah by a man he had been having inappropriate sexual conversations with on Roblox.¹⁴
- In 2021, an <u>11-year-old girl</u> in California went missing and was found with her abuser, who used Roblox to groom and lure her to his friends' apartment, where he attempted to commit suicide when police arrived to rescue the girl. ¹⁵
- In 2021, a <u>12-year-old boy in Texas</u> 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. ¹⁶

- In 2019, an <u>18-year-old man</u> was charged with 26 counts of child pornography after soliciting nude images from children ages 10 to 12 on Roblox.¹⁷
- In 2017, a <u>12-year-old boy in New Jersey</u> was groomed by a 56-year-old Virginia man on Roblox. ¹⁸

The Case of S.U.¹⁹

S.U.'s childhood was supposed to be filled with innocent fun, but instead, it was marred by the heinous actions of predators lurking on the Roblox platform. Despite her mother's watchful eye, S.U. was targeted by not one, but *two* adult men who manipulated, exploited, and abused her through the game. These predators used Roblox as a hunting ground for vulnerable children, and the company did nothing to stop them.

The two predators targeting S.U. may have been the most overt abusers, but S.U. was bombarded with sexual advances from other adult players too. Roblox's supposed monitoring tools for inappropriate, *dangerous* behavior seem to only apply to swearing and fighting, not the rampant sexual predation happening on your watch. And when S.U. tried to reach out for help, she found none.

The toll of this abuse on S.U. is immeasurable. It drove her to attempt suicide twice. She has been stripped of her childhood and her mental health continues to suffer. Her mother struggles every day to get her daughter the help she needs, all while fighting for justice against the company that failed to protect her daughter.

S.U.'s story is a heartbreaking reminder that we cannot let companies like Roblox prioritize profits over the safety of our children. We must demand accountability and change to ensure that no child suffers like S.U. did.

The Case of Utah Boy, Age 13²⁰

At the tender age of 13, a Utah boy was lured into a trap on your platform, an app that his parents trusted to be safe for their child. But behind the facade of child-friendly graphics and colorful characters, a predator was lurking, preying on vulnerable children like him. With cunning tactics and false promises, the abuser persuaded him to migrate to other apps, including Discord and Twitter, where the grooming continued to take place in the shadows.

Then came the unthinkable. One day, the boy was suddenly snatched away and taken across state lines before the authorities finally intervened. The trauma that he and his family have been forced to endure is nothing short of a living nightmare. Their once happy home has been shattered into a million pieces, and the boy's life will never be the same again.

This tragedy occurred just in the past six months.

And it could have been avoided if Roblox had taken a stronger stance against the presence of adult predators on your platform. While the company may tout its commitment to safety, these bold statements have proven hollow in the face of frequent incidents of abuse. It's past time for Roblox to step up and protect the innocent children who use your platform before another tragedy like this one occurs.

Sexualized Themes and Activities and Other Inappropriate Content within Experiences

We appreciate that your policies prohibit such activities, however, there are hundreds of games with sexually explicit themes, including strip clubs, dance clubs, "Condo Experiences," and more. Child accounts by

default have access to all of these experiences. (This article in <u>Rolling Stone</u> addresses the "virtual strip clubs" on Roblox.)²¹

Many youth have reported innocently visiting "condo experiences" only to be encouraged to visit someone's "home," go into the "bedroom," and then engage in virtual sexual acts. Other children innocently wander around the games and stumble on this activity. NCOSE researchers created a 10-year-old account on Roblox and were easily exposed to inappropriate content, as shown in the screenshots below.

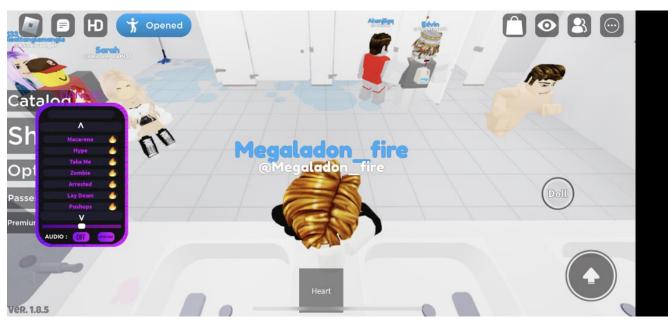
We plead with you to urgently address this problem on your platform.







The third experience we visited after setting up this account was "Bathroom simulation 1" (appearing in the recommended for you homepage), where there was an avatar walking around with no clothes on.



A mother created an account she was testing before letting her six young children onto Roblox and her avatar was sexually assaulted in a similar bathroom simulator (in case you inexplicably did not see this story from this past January, you can view the Twitter thread <u>here</u>²² and read more about this situation <u>here</u>²³).

It took less than a minute for this to start happening once my character was stuck in the puddle.

(CW, for... uhh... Roblox non-con?)



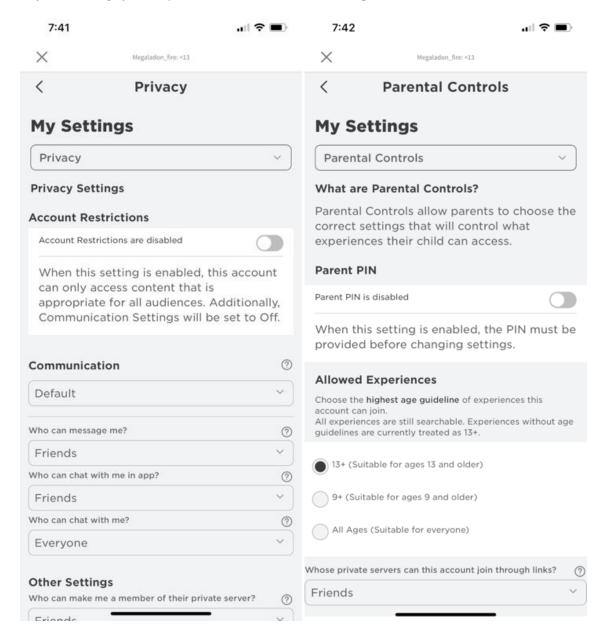
Screenshot taken of an embedded video on Twitter, April 27, 2023

Grossly Inadequate Child Protection and Insufficient Parental Controls on Roblox

Your platform has a responsibility to protect children from harm, yet you continue to fall short in this regard. Children of any age are allowed to create accounts; no email and no parental permission is required. By default, you set young child accounts to:

- allow access to 13+ experiences
- allow in-game chatting between young children and everyone else
- allow anyone to "friend" young child accounts (parents cannot even disable this access)

Default settings for 10-year-old account created on April 22, 2023:



It is unacceptable that even with all of the documented harms, Roblox still does not automatically default settings for children to the safest measures.

The "parental controls" you do offer are inadequate. They don't offer protection against some of the most basic risks (allowing parents to blacklist or whitelist specific games or stopping adult strangers from friending kids) and where they do offer some solutions, they are not comprehensive. Instead, Roblox's parental controls create a false sense of security for parents who trust you. For example, many parents believe they are disabling chatting, but are not told that it only stops some forms of chatting and that adults can still communicate with kids through certain games. Likewise, parents are not told that anyone can

"friend" their child when they set chatting to be only with friends. Your users and their parents deserve transparency and accountability. We need to know the truth to keep kids safe.

Roblox must provide effective parental controls. The following are some of the flaws with your current tools:

- 1. *Inadequate Filtering:* The platform's filtering system is not always effective at blocking inappropriate content, including sexual content and violence. This means that children can still be exposed to harmful material despite parental controls being in place. Many games are marked as "all ages" when they include mature and sexualized themes.
- 2. *Limited Customization:* While parents can customize some aspects of their child's account, such as restricting most ways to chat, they cannot customize the filtering system or create their own list of blocked words or games. Additionally, parents cannot stop strangers from requesting to be friends with children.
- 3. *Limited Visibility*: Roblox's parental controls do not give parents full visibility into their child's activity on the platform. For example, parents cannot see the content of private messages sent between their child and another user.
- 4. *Lack of Age Verification*: Roblox does not verify the age of its users, making it easier for underage children to access the platform and potentially harmful content, and for adult users to lie about their ages and gain easier access to youth users. When a child does join the game, there are no prompts requesting parental permission or encouraging the kids or parents to utilize the parental controls.
- 5. *Insufficient Guidance*: Roblox's parental controls do not provide sufficient guidance to parents on how to effectively monitor their child's activity and keep them safe while using the platform.
- 6. *Lack of Transparency:* Many parents trust when Roblox says parental controls will disable chats or filter inappropriate content. Roblox owes it to parents to explain where its tools fall short and to clarify common work-arounds used to continue chatting (using signs for example) or exposing kids to dangerous material.
- 7. Complicated to Set Up: Parents have to go to multiple places within the app to restrict access to certain content and who has access to their children. It is not easy to find instructions for parental controls, and those that are on your website are not simple to follow and do not explain where the tools fall short.

It is not enough to rely on parents to monitor their children's activity on your platform when Roblox has a duty to implement strong and effective measures to prevent these heinous crimes.

Required Changes at Roblox

At the very least, Roblox must prioritize and expedite the following changes to ensure *all* users – but especially your youngest users – are safe and free from sexual abuse and exploitation:

- 1. **Default minor accounts** to the highest safest settings
- 2. **Disable direct messaging** between children and adults with whom they are not friends; consider blocking direct messaging for children 15 and under as TikTok has done
- 3. **Expand caregiver tools** to help parents protect their children while using Roblox; obtain permission by parents for children 12 and under to access the platform

- 4. **Implement age verification measures** to restrict adult users from lying about their age and gaining access to children
- 5. Augment prevention and moderation measures to block and remove all inappropriate content and games that contain sexual themes or other explicit material; at minimum, do not allow minors to access such games. An additional age rating of 17+ must be added if you continue to allow sexual and violent themes.
- 6. **Improve reporting systems** so that it is easier for users to report inappropriate behavior; take swift action to remove any users who are found to be engaging in inappropriate behavior
- 7. **Increase transparency** especially to parents when it comes to reporting and handling cases of grooming and exploitation, as well as the dangers kids face on your platform and the ways your safety settings commonly fall short

It is past time for you to take responsibility for the harm that has been inflicted on innocent children on your platform. Ignoring the risks is not an option. We are optimistic that Roblox will make the necessary changes with the urgency commensurate to the harms your platform poses. Please take action *now* before another child falls victim to the dangers of Roblox.

Respectfully,

Patrick Trueman, Esq.

Dawn Hawkins

Mur Hawkins

President

CEO

Cc:

Manuel Bronstein, Chief Product Officer

Craig Donato, Chief Business Officer

¹ Sampling of quotes from law enforcement press conferences and news releases:

^{• &}quot;Roblox has become a hunting ground for sexual predators to groom and exploit children." – Detective Superintendent Jon Rouse, Australian Federal Police (Source: ABC News Australia)

 [&]quot;Parents, if you let your children go on Roblox unsupervised, please be aware that predators are waiting to exploit them."
 Detective Chief Inspector Dan Ison, UK's Child Exploitation and Online Protection (CEOP) Command (Source: BBC News)

^{• &}quot;Roblox presents an especially insidious threat, since it is a platform used mostly by children." – Frank J. Russo Jr., Acting Special Agent in Charge of Homeland Security Investigations (Source: Homeland Security Today)

^{• &}quot;Roblox is no longer a game. It is now a hunting ground for predators and pedophiles who know they can meet children here and communicate with them without being monitored." – Jacob T. Leiper Sr., Assistant Special Agent in Charge at the U.S. Immigration and Customs Enforcement Homeland Security Investigations office in Pittsburgh (Source: Pittsburgh Post-Gazette)

 [&]quot;Roblox, like many online gaming platforms, has become a target for those who prey on the vulnerabilities of children."
 Marcus Knott, FBI Special Agent in Charge of the Kansas City Field Office (Source: KSHB News)

https://www.wired.com/story/on-roblox-kids-learn-its-hard-to-earn-money-making-games.

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