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April 3, 2024

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

Re: Roblox on 2024 Dirty Dozen List for facilitating sexual exploitation and abuse by refusing to implement basic child safety measures

Dear Mr. Baszucki:

We are writing to advise that Roblox has once again been named to the National Center on Sexual Exploitation's annual Dirty Dozen List featuring 12 mainstream contributors to sexual exploitation and abuse. The List will be released Wednesday, April 10, 2024.

Inexplicably, despite requests from NCOSE and [warnings from other child online safety experts](#),¹ despite being [sued for harms to children](#),² despite [new stories of kidnappings](#)³ and [sexual assault](#)⁴ due to connections through your platform, despite [pleas from thousands of parents](#)⁵ to do better – **you have not made any child safety improvements within the past year. Instead of expanding additional safety features and bettering moderation practices, Roblox devoted its resources this past year to launch new features that further endanger children.** By [expanding into online dating](#)⁶ (including for 17-year-olds, *who are still minors*) and launching [Roblox Connect](#) without fixing existing problems,⁷ you are opening up more possibilities for predators to engage with minors in ways that will go undetected. By doubling down to grow your adult user base, you are prioritizing profit over child protection.

Given that the majority of your user base are children aged 15 and under, **Roblox should be the gold standard in child online safety.** You are profiting primarily from kids – yet at a time of ever-increasing child exploitation online, you continue to refuse to implement basic, common-sense safety and privacy measures. Why? How is it *still* possible for a five-year-old to create a Roblox account and immediately have the ability to connect with adults and to access “experiences” like rape-themed “games”?

1201 F St. NW, Suite 200, Washington, DC 20004 | 202.393.7245 | [EndSexualExploitation.org](#) | [public@ncose.com](#)

BUILDING A WORLD WHERE ALL PEOPLE CAN LIVE AND LOVE FREE FROM SEXUAL ABUSE AND EXPLOITATION

One of our researchers created an account as an 11-year-old girl on Roblox. This was her experience on your platform within 45 minutes:

- ⇒ In “Boys and Girls sleepover” walked in on people simulating sex and walking around in thongs, chat offering “I’m single,” “let’s play spin the bottle,” and “let’s all get to bed.”
- ⇒ In “The Hood” was “murdered” in various ways (i.e., shot in the head) and then stomped on and kicked (avatar was frozen when dead, so couldn’t move). Body was dropped in an alley. Saw what looked like prostitution in the streets (avatars dressed in stereotypical prostitution dress, other avatars – mostly male-looking – would bring what looked like “gifts” and simulate sex acts). “Soundtrack” was gun shots and people being punched.
- ⇒ “Get Eaten by a Neko Girl” had sexually dressed “guards” in front of various houses (players have to pay to get in). Note: “neko girl” is an anime girl that looks like a cat – almost always highly sexualized.
- ⇒ In “Critters Roleplay” was humped by a character in a bunny costume.
- ⇒ In “Squid Game” – based on the graphic TV show – was trapped in a room with hooded guards with guns.

Another researcher had an account as a 13-year-old and was asked to move to Discord to chat, asked for pictures of her feet, and was subjected to chats such as “very lonely need girl,” “really need girl right now,” and worse.

Even platforms that are meant for ages 13+ are creating more safety features and defaulting them for minors, yet Roblox leaves young children to fend for themselves on a platform with 50 million “worlds.” We would like to understand your logic for these actions, as they are suggestive of negligence.

We acknowledge that Roblox does have certain safety measures in place – however, they are primarily accessible through your complicated parental control tools. We know – and likely you do too – that roughly only [1 out of 3 parents use parental controls on apps](#).⁸ You are likely leaving roughly 60%+ of kids at risk of experiencing harmful contact and content by not implementing common-sense safety features.

NCOSE has reached out to Roblox multiple times over the course of the past year. We have never heard back. We are attaching our most recent email to you from our Vice President and Director of Corporate Advocacy, as well as our 2023 Dirty Dozen List Notification Letter. We have additional evidence that we have collected in the past few months that prove all the issues outlined and the recommended changes in our original communications remain unchanged, with one addition:

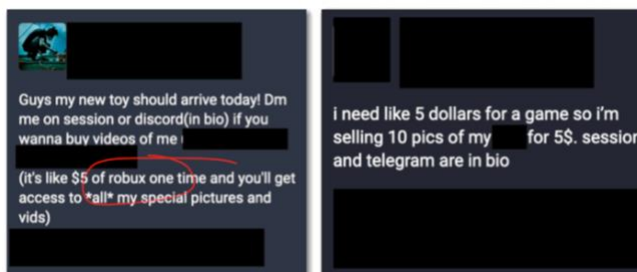
Robux being used for child sex abuse content

We are deeply concerned about increasing reports of Roblox currency **“Robux” being used to entice children into performing sexual acts both on and off Roblox.**

- A **Stanford Internet Observatory report on [Addressing Child Exploitation on Federated Social Media](#)** posted this screenshot showing the type of currency children are posting for their own, self-generated CSAM (page 8).⁹

4.3 Self-Generated CSAM trading and grooming

While advertising of commercial Self-Generated CSAM (SG-CSAM) is far less prevalent than on larger platforms such as Instagram and Twitter,²¹ it is still present on the Fediverse. Demographics of apparent underage sellers of explicit content are notably different on the Fediverse: sellers tend to primarily be teenage boys or transgender girls, while on other platforms sellers are almost entirely cisgender girls.²² Redacted examples of seller accounts can be seen in Figure 3.



- **Safe on Social issued an [Urgent Update on Roblox and Online Safety](#)** (October 2023) warning about children as young as 3-6 increasingly interacting with strangers on Roblox.¹⁰ They also noted cases of children being asked to role-play and offers of free in-game currency in exchange for inappropriate interactions.

An article about the warning, [Is Roblox safe? Safety experts don't think so](#), noted “some 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.”¹¹

While this is not something NCOSE has had the capacity to investigate in-depth so far (nor has it yet been widely examined or catalogued by child safety experts), we will be doing so throughout 2024 and will encourage other stakeholders to do the same. Roblox needs to investigate this immediately and develop means to prevent the use of Robux for grooming and/or criminal activity, including receipt and distribution of child sexual abuse material.

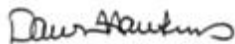
NCOSE – a tiny nonprofit with limited resources – has done the work that your Trust and Safety Teams should be doing. We have collected the research and evidence that your staff should be reviewing. We have met with the survivors, with law enforcement, with experts that your team should be consulting. Yet you have repeatedly refused our offers to meet and to connect you with other professionals in the child online safety space.

There can be no more excuses for keeping countless children at risk of being accessed by predators and exposed to harmful content. You have been put on notice of these harms and cannot claim ignorance.

Though we are deeply disappointed that Roblox continues to turn away from evidence of exploitation on your platform, we *are* heartened that an increasing number of policymakers, child online safety advocates, and parents are starting to understand the many dangers Roblox poses to your majority minor user base. We anticipate that attention on Roblox’s failures to act will only increase. NCOSE commits to increasing our spotlight on your failures with policymakers, the press, and the public (with parents in

particular) to ensure that if Roblox does not voluntarily do what is right, that it is held accountable for the harms it knowingly continues to facilitate and enable – and from which Roblox is likely profiting.

Thank you for your attention,



Dawn Hawkins

CEO



Kindsey P. Chadwick

Interim President

Cc:

Manuel Bronstein, Chief Product Officer

Matt Kaufman, Chief Safety Officer

Daniel Sturman, Chief Technology Officer

Mark Reinstra, General Counsel

Attached:

- 11/16/23 email from NCOSE Vice President and Director of Corporate Advocacy
- 2023 Dirty Dozen List Notification Letter to Roblox

¹ Kirra Pendergast, “Urgent Update on Roblox and Online Safety,” *Safe on Social*, October 26, 2023, <https://www.safeonsocial.com/post/urgent-update-on-roblox-and-online-safety>.

² Ethan Baron, “Roblox of San Mateo Fails to Protect Child Gamers from Predators, Sexual Content, Lawsuit Claims,” *The Mercury News*, December 8, 2023, <https://www.mercurynews.com/2023/12/08/roblox-of-san-mateo-fails-to-protect-child-gamers-from-predators-sexual-content-lawsuit-claims>.

³ Rana Novini and Tom Shea, “NJ Girl Kidnapped by Man She Met Playing Online Video Games Including Roblox: Police,” *NBC New York*, October 17, 2023, <https://www.nbcnewyork.com/news/local/crime-and-courts/nj-girl-kidnapped-by-man-she-met-playing-online-video-games-including-roblox-police/4773231>.

⁴ Kaley Brown Soren, “Man Arrested After Sexually Abusing Minor he met on Roblox: BPD,” *KGET News*, June 27, 2023, <https://www.kget.com/news/crime-watch/man-arrested-after-sexually-abusing-minor-he-met-on-roblox-bpd>.

⁵ Parents Together, “Roblox: Little Kids Deserve Privacy!” Petition, accessed March 5, 2024, <https://act.parentstogetheraction.org/petitions/roblox-little-kids-deserve-privacy>.

⁶ Rhiannon Bevan, “Roblox Is Opening ‘Dating Experiences’ To Players Aged 17+,” *The Gamer*, September 9, 2023, <https://www.thegamer.com/roblox-is-opening-dating-experiences-to-players-aged-17>.

⁷ Josh Taylor, “Roblox Under Fire After Adding Controversial Voice Call Feature,” *Dexerto*, November 15, 2023, <https://www.dexerto.com/roblox/roblox-under-fire-after-adding-controversial-voice-call-feature-2384564>.

⁸ Parents Together, *Afraid, Uncertain, and Overwhelmed: A Survey of Parents on Online Sexual Exploitation of Children* (Parents Together, 2023), https://parentstogetheraction.org/wp-content/uploads/2023/03/PT_PDF_final-2.pdf.

⁹ David Thiel and Renée DiResta, *Child Safety on Federated Social Media* (Stanford Internet Observatory, July 2023), 8, <https://stacks.stanford.edu/file/druid:vb515nd6874/20230724-fediverse-csam-report.pdf>.

¹⁰ Pendergast, *ibid.*

¹¹ Daniel Lo Surdo, “Is Roblox Safe? Safety Experts Don’t Think So,” *The Daily Aus*, April 30, 2023, <https://thedailyaus.com.au/stories/is-roblox-safe-one-online-safety-expert-doesnt-think-so>.

Thursday, November 16, 2023 at 13:01:12 Eastern Standard Time

Subject: We'd love to take Roblox off the Dirty Dozen List
Date: Thursday, November 16, 2023 at 12:09:37 PM Eastern Standard Time
From: Lina Nealon
To: [REDACTED]@roblox.com
CC: info@Roblox.com, [REDACTED]
Dawn Hawkins

Attachments: image001.jpg, Roblox Notification Letter_DDL 2023_FINAL.pdf

Mr. Baszucki -

It's been over half a year now since The National Center on Sexual Exploitation reached out to you – imploring you to make some simple, yet significant changes to protect your young user base.

We have not heard back from you, nor have we seen any progress to increase child safety on your platform:

Rather, in these past few months, Roblox has

- Once again been used as the tool of choice for a [predator who groomed and then kidnapped a young girl he met on your platform](#)
- Launched [Roblox Connect](#). We couldn't agree more with the sentiment of someone who commented on your blog: *"Instead of trying to fix the problems of predators on Roblox, add more features to help them. Awesome job Roblox,"*
- Doubled-down on efforts to entice more adults onto the platform – officially [expanding into online dating](#) (including for 17-year-old-kids who are likely still in high-school!)

More than 2,000 of our supporters reached out to Roblox begging you for simple, common sense changes to safeguard their kids – like defaulting all safety options to the highest settings. But instead of hearing those pleas and committing to do better – those who reached out were sent a disingenuous response claiming that “safety is a top priority.” If that is true, why can a five-year-old sign up with no email or parental permission and access games in which their character may be sexually assaulted?

Perhaps Roblox has recently made substantive changes to improve child safety that we have missed... If so, please do share those with us and we would more than happily amplify any positive steps Roblox has taken since being placed on the Dirty Dozen List.

But if Roblox has not made any improvements – and does not do so in the next few months – we will very likely place your company on the 2024 Dirty Dozen List. I personally commit to redoubling our efforts to expose major safety gaps to the press, the public (especially parents), shareholders, and policymakers: including advocating Roblox be brought to testify in front of Congress.

We acknowledge that Roblox does have certain safety measures in places. However, they rely largely on parental oversight. We know – and likely you do to – that roughly only [1 out of 3 parents use parental controls on apps](#). You are leaving the other 60% + kids at risk by not implementing common sense safety features to prevent harmful contact and content. **Given who your user base is Roblox should be the gold standard for child online safety.**

I'd like to leave you with this heartbreaking anecdote one our supporters sent to us after he saw Roblox on the Dirty Dozen List. I hope you think about the many children who have been hurt by these types of experiences (and worse!) on Roblox who are suffering quietly. Please do everything you can to prevent harm to children from ever happening on Roblox again.

*My grandson used to play Pokemon with me but then he got into Roblox when he turned 9. I didn't know anything about it until I saw it on the Dirty Dozen List. Even worse, a few weeks into my grandson playing Roblox he started to change drastically. My grandson only wanted to ever play Roblox. He didn't like Pokemon anymore and he didn't want to hike with me anymore when I come to his parents' house. It was so strange. The day I read Roblox was on the Dirty Dozen List I called my grandson's mom and said "Hey you need to get your kid off this game--it's on the Dirty Dozen List" and she said the most heartbreaking thing I ever heard. **"He is already off the game because I caught him playing a rape game". I was absolutely terrified. My grandson who I thought was innocent and pure was playing a rape game.** I cried in bed for several hours after that sickened to think that my grandson whom I loved was permanently tainted.*

Our invitation to meet to discuss these issues further remains open.

Lina Nealon

Vice President & Director of Corporate Advocacy
National Center on Sexual Exploitation
202.430.2607 (c) | EndSexualExploitation.org
[1201 F St NW, Suite 200, Washington, DC 20004](#)

From: Dawn Hawkins [REDACTED]
Date: Monday, May 1, 2023 at 1:55 PM
To: [REDACTED]
Cc: info@Roblox.com [REDACTED] Lina Nealon [REDACTED]
Patrick Trueman [REDACTED]
[REDACTED]
Subject: Roblox named to 2023 Dirty Dozen List

Dear Mr. Baszucki,

Attached you will find a letter regarding Roblox being named to the annual 2023 Dirty Dozen List as a major facilitator of sexual exploitation and abuse. Unfortunately, extensive evidence suggests that Roblox has not sufficiently prioritized child protection and has



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Retired, Psychiatrist

MELEA STEPHENS, L.P.C., M.M.F.T.
Marriage and Family Therapist

CAROLYN WEST, PH.D.
Professor of Clinical Psychology
University of Washington

JUSTICE MICHAEL J. WILKINS
Former Associate Chief Justice, Utah Supreme Court

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.¹ 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-year-old 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 [named a top five platform for child exposure to inappropriate sexual content](#), 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 [five-year-old can sign up with no email or parental permission and access games where their character may be raped?](#)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 [parents to try to monitor a platform with more than 40 million games](#).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 [33.6 million children under age 16 using your platform daily, 12.3 million of whom are under age eight](#),⁶ if for nothing else than for the fact that a significant amount of your [\\$2.2+ billion in revenue](#)⁷ comes from [your underage users](#).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 [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.⁹
- 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.¹⁰
- In 2022, a [thirteen-year-old girl](#) in Topeka was rescued from a man she met on Roblox who was sex trafficking her.¹¹
- 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.¹²
- In 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.¹³
- In 2022, a [13-year-old boy](#) was abducted from his home in Utah by a man he had been having inappropriate sexual conversations with on Roblox.¹⁴
- 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 friends’ apartment, where he attempted to commit suicide when police arrived to rescue the girl.¹⁵
- 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.¹⁶

- 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.¹⁷
- In 2017, a [12-year-old boy in New Jersey](#) 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 [Rolling Stone](#) 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 [here](#)²² and read more about this situation [here](#)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?)



51 91 568 164.6K

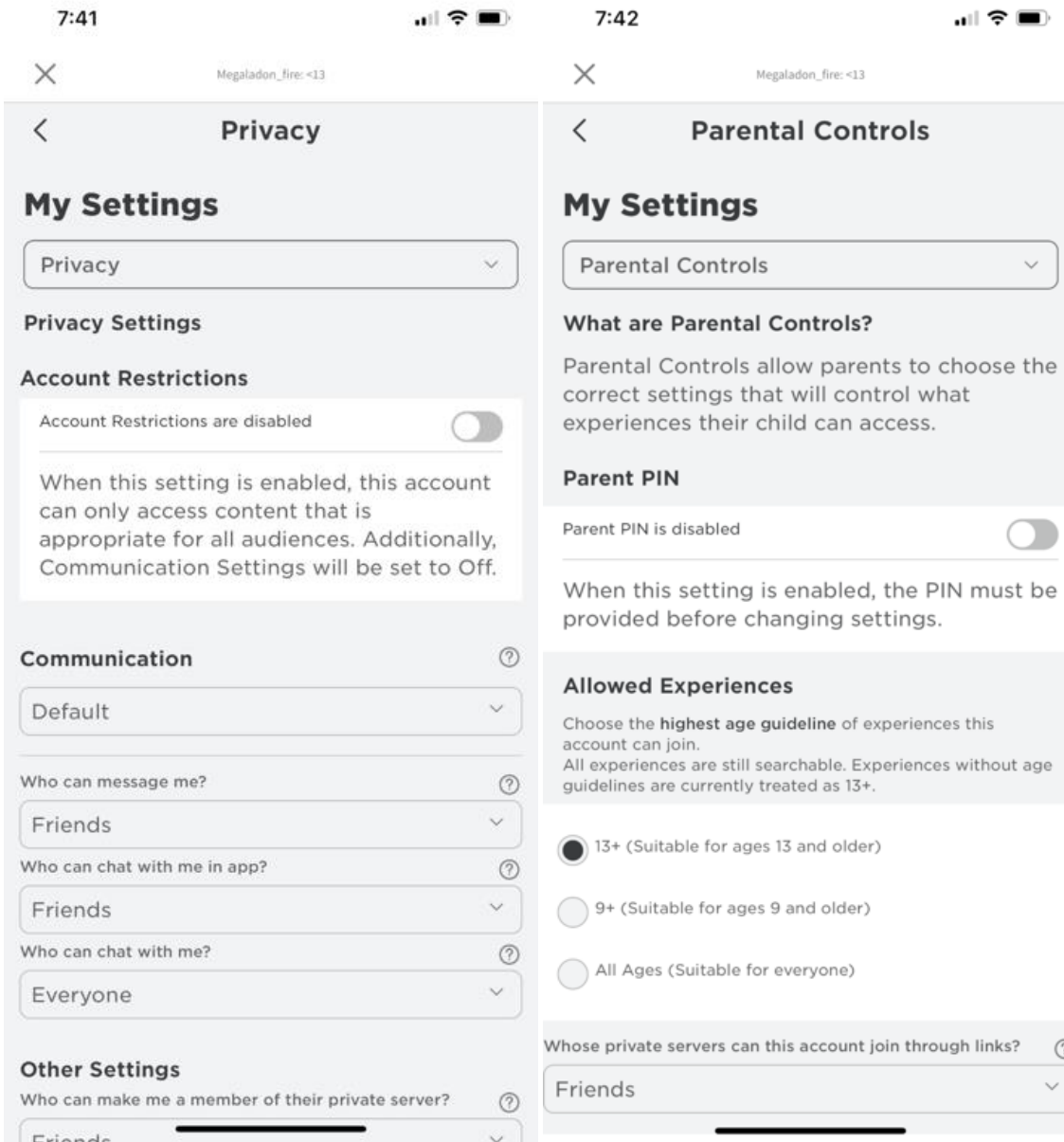
Screenshot taken of an embedded video on Twitter, April 27, 2023

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

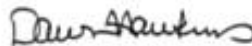
4. **Implement age verification measures** to restrict adult users from lying about their age and gaining access to children
5. **Augment prevention and moderation measures to block and remove all inappropriate content and games that contain sexual themes or other explicit material**; at minimum, do 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.
President



Dawn Hawkins
CEO

Cc:

Manuel Bronstein, Chief Product Officer

Craig Donato, Chief Business Officer

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

- “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)
- “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)
- “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)
- “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)
- “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)

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