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11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 DAVID L. GENTRY, individually and as next  
14 friend of minor Plaintiff, L.G., OSMANY  
15 RODRIGUEZ, individually and as next friend  
16 of minor Plaintiff, O.R., JOSHUA R.  
17 MUNSON, individually and as next friend of  
18 minor Plaintiffs, D.C., J.M., T.T. & R.T., and  
19 LAVINA GANN, individually and as next  
20 friend of minor Plaintiff, S.J., on behalf of  
21 themselves and all others similarly situated,

22 Plaintiffs,

23 v.

24 ROBLOX CORPORATION, SATOZUKI  
25 LIMITED B.V., STUDS ENTERTAINMENT  
26 LTD., and RBLXWILD ENTERTAINMENT  
27 LLC,

28 Defendants.

**Case No.:**

**CLASS ACTION COMPLAINT  
FOR DAMAGES**

**DEMAND FOR JURY TRIAL**

29 Plaintiffs David L. Gentry, individually and as next friend of minor Plaintiff, L.G., Osmany  
30 Rodriguez, individually and as next friend of minor Plaintiff, O.R., Joshua R. Munson, individually  
31 and as next friend of minor Plaintiffs, D.C., J.M., T.T. & R.T., and Lavina Gann, individually and as  
32 next friend of minor Plaintiff, S.J., bring this Class Action Complaint against Defendants Roblox  
33 Corporation (“Roblox”), Satozuki Limited B.V. (“Satozuki”), Studs Entertainment Ltd. (“Studs”), and  
34 RBLXWild Entertainment LLC (“RBLXWild”), and make the following allegations based upon

1 information and belief, except as to allegations specifically pertaining to Plaintiffs, which are based  
2 on personal knowledge.

3 **NATURE OF THE ACTION**

4 1. This is a case concerning an illegal gambling operation that is preying on children  
5 nationwide. As described herein, Plaintiffs bring this action on behalf of themselves, their minor  
6 children, and proposed classes of all those similarly situated against Roblox and its co-conspirators,  
7 Satozuki, Studs, and RBLXWild. Together, these entities maintain and facilitate an illegal gambling  
8 ecosystem, targeted at children, through Roblox’s online gaming platform and digital currency.

9 2. Defendant Roblox is one of the largest and fastest growing gaming platforms in the  
10 world, designed to bring users together in a virtual universe, or “metaverse.” It is a free online gaming  
11 platform that allows users to interact with one another, play games, and purchase items inside the  
12 Roblox virtual universe.

13 3. Indeed, Roblox is the largest entertainment website in the world for kids, with over 60  
14 million daily active users. The vast majority of Roblox’s users are children under the age of 18. In fact,  
15 at least 70% of Roblox’s users are under the age of 18, with more than half of all users being under  
16 the age of 13.

17 4. Roblox’s market dominance in the children’s video game sector is so large that  
18 Roblox itself claims that more than 75% of the kids aged 9-12 in the United States use Roblox on a  
19 monthly basis.<sup>1</sup>

20 5. These children spend an enormous amount of time and money exploring the Roblox  
21 world day in and day out.

22 6. However, even though these children have made Roblox extremely successful, Roblox  
23 systematically takes advantage of them.

24 7. In its relatively short existence, Roblox has been surrounded by a deluge of negative  
25 attention as a dangerous space for children. Multiple child advocacy agencies and consumer  
26

27 \_\_\_\_\_  
28 <sup>1</sup> Roblox, YOUTUBE (July 31, 2020, 3:45), <https://www.youtube.com/watch?v=G00G1CJc0mU>.

1 protection groups have spoken out about Roblox’s targeting of children with deceptive commercial  
2 advertising and addictive content.<sup>2</sup>

3 8. Roblox has also been the subject of countless press articles describing how Roblox’s  
4 child users are exposed to predatory conduct from other—primarily adult—users on the platform,  
5 including “simulated violence, simulated sex, [and] simulated rape.”<sup>3</sup>

6 9. Roblox, along with its co-Defendants, is behind another growing problem that has  
7 ensnared hundreds of thousands of its adolescent and teenage users, causing substantial financial  
8 loss—illegal online gambling.

9 10. Roblox allows users to make purchases of virtual items to be used in games or apps  
10 within the Roblox ecosystem. These purchases can be made with Roblox’s digital currency, called  
11 Robux, which are exclusively created by and “only sold by the Roblox company.”<sup>4</sup>

12 11. Robux are purchased using a credit card or digital payment service and users then use  
13 this digital currency to buy items within the various games hosted in the Roblox universe.

14 12. Because most of Roblox’s users are minors, Roblox allows adults, such as a user’s  
15 parents, to purchase Robux for their children to use on the Roblox ecosystem. Roblox also sells gift  
16 cards that permit the user—often a minor child—to make purchases of Robux.

17 13. In its Terms of Service, Roblox misleadingly represents to parents and other users that  
18 its platform and digital currency are safe. Further, Roblox explicitly represents that “*experiences*  
19 *that include simulated gambling, including playing with virtual chips, simulated betting, or*  
20 *exchanging real money, Robux, or in-experience items of value are not allowed.*”<sup>5</sup>

21 14. But this representation is false, or misleading at best. In fact, Roblox allows third party  
22 gambling websites, including the highly popular online casinos operated by Defendants Satozuki,  
23 Studs, and RBLXWild (collectively, the “Gambling Website Defendants”), to use the Roblox website

24 <sup>2</sup> See, e.g., <https://www.newsnationnow.com/investigation/roblox-advertising-practices/>.

25 <sup>3</sup> James Crummel, *Roblox risks: hidden dangers in your child’s favorite games*, ABC27.COM (Feb.  
26 25, 2020), <https://www.abc27.com/local-news/roblox-risks-hidden-dangers-in-your-childsfavorite-games/>.

27 <sup>4</sup> <https://en.help.roblox.com/hc/en-us/articles/203313200-Ways-to-Get-Robux>

28 <sup>5</sup> <https://en.help.roblox.com/hc/en-us/articles/203313410-Roblox-Community-Standards> (emphasis added)

1 to accept online bets using Robux, to be placed on games at the Gambling Website Defendants’ virtual  
2 casinos. Roblox also facilitates the Gambling Website Defendants’ efforts to track bets, complete  
3 transactions, wager Robux, and satisfy wagers in their digital casinos.

4 15. All of the gambling transactions take place on Roblox’s website under Roblox’s virtual  
5 roof and are monitored by Roblox.

6 16. Roblox maintains an internal ledger or other recording system whereby it tracks both  
7 the flow and/or exchange of Robux on its platform, as well as the individuals and organizations  
8 involved in such transactions.

9 17. Roblox registers each and every exchange of Robux for gambling credits and allows  
10 illicit gambling, by minors, using the Roblox website. All of the gambling transactions require  
11 Roblox’s affirmative support to continue. Roblox profits from these transactions to the detriment of  
12 its users, including its minor, adolescent, and teenage users.

13 18. Here is how the process works: Roblox’s minor users first purchase Robux through the  
14 Roblox website, using either their own money, a parent’s credit card, or gift cards they possess. Next,  
15 the minor user navigates to one of the Gambling Website Defendants’ virtual casinos that exist outside  
16 the Roblox ecosystem. Then, the user links their Robux wallet on Roblox’s website to the gambling  
17 website. And finally, once the minor-user’s wallet is linked, the gambling website converts the minor  
18 user’s Robux into credits that can only be wagered in their virtual casinos. Throughout this process,  
19 Roblox keeps track of all of these electronic transfers and has knowledge of each transfer that occurs  
20 in its ecosystem.

21 19. Importantly, while a minor user must navigate off Roblox’s website to access the online  
22 casino and their new digital gambling credits, in reality the minor user’s Robux have not been  
23 converted to another currency and they never leave Roblox’s website. Instead, the Gambling Website  
24 Defendant merely take control of the Robux, while providing a corresponding number of “credits”  
25 (which are also called Robux) on their third-party gambling websites.

26 20. Further, because the exchange of Robux must occur within the Roblox website, Roblox  
27 allows the Gambling Website Defendants to establish a Robux exchange within the Roblox ecosystem.  
28

1           21.     If a user happens to win at Defendants’ casino games, thereby increasing their total  
2 credits, the Gambling Website Defendants transfer back to the user the additional value in Robux. If,  
3 as is more likely and common, a minor user loses their credits in the Gambling Website Defendants’  
4 virtual casino, those Defendants retain the user’s Robux. The gambling credits function just like chips  
5 in a brick and mortar casino; users “buy in” using their Robux, obtain chips, gamble until they lose  
6 their money or wish to cash out, and, if they increase their credits, they cash those credits out in  
7 exchange for Robux.

8           22.     This entire exchange of Robux occurs on the Roblox platform with Roblox’s  
9 knowledge and active support, and Robux never leave the Roblox ecosystem unless and until they are  
10 cashed out for fiat currency.

11          23.     Roblox works with and facilitates the Gambling Website Defendants’ use of its website  
12 to offer illegal gambling opportunities to minor users.

13          24.     Roblox could, of course, prohibit and/or stop the Gambling Website Defendants from  
14 utilizing the Roblox ecosystem and digital currency to facilitate illegal gambling but it does not.

15          25.     This is because Roblox is significantly enriched by this illegal scheme. After the  
16 Gambling Website Defendants take Robux from adolescent and teenage users and ultimately convert  
17 the Robux into cash, Roblox charges a 30% fee on this transaction, which amounts to millions in  
18 annual cash fees.

19          26.     Roblox and the Gambling Website Defendants have concocted an illegal gambling ring  
20 to target the adolescents and teenagers who comprise the majority of Roblox’s users. Roblox knows  
21 its Robux are being used to place bets in illegal virtual casinos, directly facilitates this transfer within  
22 the Roblox ecosystem, then imposes a fee on the ill-gotten gains accrued by the Gambling Website  
23 Defendants when they seek to convert Robux to cash.

24          27.     Plaintiffs’ minor children—like hundreds of thousands of others across the United  
25 States—fell prey to this illegal scheme and were victimized out of real money. As a result, the  
26 Gambling Website Defendants have earned millions off the backs of those too young to legally gamble,  
27 all the while providing Roblox with a sizable cut of the money they’ve illegally obtained.

1 28. Accordingly, this is a civil action seeking to put an end to this illegal scheme.

2 29. Through this class action lawsuit, Plaintiffs seek monetary damages, restitution, and  
3 declaratory and injunctive relief on behalf of proposed Classes of minor victims.

4 **PARTIES**

5 ***I. Plaintiffs***

6 30. Plaintiff L.G. and his father and next friend, DAVID L. GENTRY, are citizens and  
7 residents of the State of South Carolina.

8 31. Plaintiff O.R. and his father and next friend, OSMANY RODRIGUEZ, are citizens and  
9 residents of the State of Florida.

10 32. Plaintiff D.C. and his father and next friend, JOSHUA R. MUNSON, are citizens and  
11 residents of the State of Georgia.

12 33. Plaintiff J.M. and his father and next friend, JOSHUA R. MUNSON, are citizens and  
13 residents of the State of Georgia.

14 34. Plaintiff T.T. and his father and next friend, JOSHUA R. MUNSON, are citizens and  
15 residents of the State of Georgia.

16 35. Plaintiff R.T. and his father and next friend, JOSHUA R. MUNSON, are citizens and  
17 residents of the State of Georgia.

18 36. Plaintiff S.J. and his mother and next friend, LAVINA GANN, are citizens and residents  
19 of the State of Tennessee.

20 ***II. Defendants***

21 37. Defendant Roblox Corporation is a corporation existing under the laws of the State of  
22 Delaware, with its principal place of business located at 970 Park Place, San Mateo, California 94403.  
23 Roblox regularly conducts and transacts business in this District and throughout the United States.

24 38. Defendant Satozuki Limited B.V. is a foreign company registered in accordance with  
25 the laws of Curaçao, with its principal office at Abraham de Veerstraat 9, Willemstad, Curaçao.  
26 Satozuki owns and operates the popular gambling website RBXFlip.

27

28

1 39. Defendant Studs Entertainment Ltd. is a foreign company purportedly registered to do  
2 business in Cyprus. Studs owns and operates the popular gambling website Bloxflip.

3 40. Defendant RBLXWild Entertainment LLC is a domestic corporation existing under the  
4 laws of Delaware. RBLXWild owns and operates the popular gambling website RBLXWild.  
5 RBLXWild regularly conducts and transacts business throughout the United States.

6 **JURISDICTION AND VENUE**

7 41. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.  
8 §1332(d)(2) because this is a class action in which the matter in controversy exceeds \$5,000,000  
9 exclusive of interest and costs, and Plaintiffs and members of the putative Classes are citizens of a  
10 state that is different from the states in which Defendants are citizens. Jurisdiction is also proper in  
11 this Court pursuant to 28 U.S.C. § 1331 because Plaintiffs' RICO claims arise under federal law and  
12 this Court has supplemental jurisdiction over Plaintiffs' state law claims under 28 U.S.C. § 1367.

13 42. This Court has personal jurisdiction over Defendants because they have their principal  
14 place of business in California, and/or because they have contacts with California that are so  
15 continuous and systematic that they are essentially at home in this state. All Defendants regularly  
16 conduct and solicit business in California, provide products and/or services by or to persons in the  
17 State of California, and derive substantial revenue from the same.

18 43. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because a substantial part  
19 of the events or omissions giving rise to Plaintiffs' and the Class Members' claims occurred in this  
20 District, and Defendants are subject to the Court's personal jurisdiction.

21 **BACKGROUND FACTS**

22 44. Rampant fraud and predatory behavior have been reported on Roblox for years.

23 45. According to multiple reports and investigations, Roblox has failed to properly deal  
24 with fraud on the platform, wage disputes, sexual content, and abusive and predatory behavior  
25 displayed by some users and developers.<sup>6</sup>

26 \_\_\_\_\_  
27 <sup>6</sup> Simon Parkin, *The trouble with Roblox, the video game empire built on child labour*, The Guardian  
28 (Jan. 9, 2022), <https://www.theguardian.com/games/2022/jan/09/the-trouble-with-roblox-the-video-game-empire-built-on-child-labour>; Burt Helm, *Sex, lies, and video games: Inside Roblox's war on*

1 46. Unfortunately, the users most often victimized by these practices are those that are the  
2 most vulnerable. Younger users, many of whom are under the age of 16, and who make up the majority  
3 of the users on the Roblox platform, are more likely to be targets of predatory or sexual behavior and  
4 more likely to be tricked, scammed, or defrauded out of their money or items.

5 47. Furthermore, these users are most at risk in the illegal gambling enterprise facilitated  
6 by Roblox. In 2022, between 60% and 80% of high school students reported that they had gambled  
7 for money in the past year.<sup>7</sup> According to the Massachusetts Department of Public Health, problem  
8 gambling impacts 4-8% of youth, compared to just 1% of adults.<sup>8</sup>

9 48. Roblox and the Gambling Website Defendants act in concert to profit from gambling  
10 games meant to attract kids. The interface of these websites is more like a mix between a video game  
11 and a casino, and as a result, is more attractive to underage users.

12 49. And further, because of the creation of Robux, a digital currency with real-world value  
13 in a children's game, the child users on Roblox have become targets of sophisticated gambling  
14 operations without their parents' knowledge of such dangers.

15 50. As a result of the illegal gambling enterprise, Roblox has made substantial revenue via  
16 its transaction fees and Robux sales to the tune of tens of millions of dollars, seeking to turn its minor  
17 customers' gambling struggles into revenue. The Gambling Website Defendants, in turn, have  
18 unlawfully enticed Roblox's minor users to wager Robux in their online casinos, manipulating  
19 adolescents and teenagers out of digital currency worth tens of millions of dollars.

## 20 ***I. The Roblox Platform***

### 21 **A. Overview**

22 51. Roblox was created in 2004 by David Baszukci and Erik Cassel, and it was released  
23 in 2006. Roblox is a 3D digital world that is entirely user generated, built by a community of nearly

24 *porn*, FASTCOMPANY (Aug. 19, 2021), [https://www.fastcompany.com/90539906/sexlies-and-](https://www.fastcompany.com/90539906/sexlies-and-video-games-inside-roblox-war-on-porn)  
25 [video-games-inside-roblox-war-on-porn](https://www.fastcompany.com/90539906/sexlies-and-video-games-inside-roblox-war-on-porn).

26 <sup>7</sup> Allie Weintraub et al., *Online gambling among youth worries experts, one teen says sports betting*  
27 *was an 'escape,'* ABC News (Dec. 8, 2022), [https://abcnews.go.com/US/onlinegambling-](https://abcnews.go.com/US/onlinegambling-youth-worries-experts-teen-sports-betting/story?id=94577595)  
[youth-worries-experts-teen-sports-betting/story?id=94577595](https://abcnews.go.com/US/onlinegambling-youth-worries-experts-teen-sports-betting/story?id=94577595) (last visited June 13, 2023).

28 <sup>8</sup> See Dept. of Public Health, *Teens gambling. It's a risk*. Mass.gov (visited on May 1, 2023),  
<https://www.mass.gov/service-details/teens-gambling-its-a-risk>.



1 7 million developers. Most of the users on Roblox are kids, with estimates showing that more than  
2 half of all U.S. kids under the age of 16 are active on Roblox.<sup>9</sup>

3 52. The Roblox platform consists of two primary layers: the Roblox Client and the Roblox  
4 Studio. The Roblox Client is the application that allows users to explore 3D digital worlds through the  
5 eyes of an avatar, which each user customizes with clothing, gear, animations, simulated gestures,  
6 emotes, and other objects. The Roblox Studio is the toolkit developers and creators use to build,  
7 publish, and operate 3D experiences and content for the Roblox Client. These developers build games  
8 and objects that can be sold to users on the platform. Purchases can be made in the Avatar Shop using  
9 Robux, the digital currency created for the platform.

10 53. 46. Underlying everything on the Roblox platform is its digital currency—Robux.  
11 Although the platform is free, nearly all experiences require the user to spend Robux in order to  
12 participate in the activities on the platform.

13 54. As set forth in more detail below, Robux is sold on the Roblox platform in various  
14 quantities. Robux can then be spent on the platform to purchase various items and/or pay for in game  
15 experiences. Robux can also be converted back into real-world currency via the Developer  
16 Exchange Program.

17 55. Roblox earns revenue by, *inter alia*, selling Robux to users so that they can make in  
18 game purchases. Additionally, Roblox benefits financially from every transaction made on its  
19 platform by taking a 30% commission fee on all user-to-user transactions.

20 ***B. Roblox’s In-Game Currency—Robux.***

21 56. Robux are the foundation of the entire Roblox platform. Roblox states in its March  
22 2022 quarterly Report that “[w]e generate substantially all of our revenue through the sales of our  
23 virtual currency, ‘Robux,’ which players can use to purchase virtual items sold by our developer and  
24 creator community on the platform.”<sup>10</sup>

25 <sup>9</sup> Taylor Lyles, “Over half of US kids are playing Roblox, and it’s about to host Fortnite-esque  
26 virtual parties too”, The Verge (July 21, 2020),  
27 [https://www.theverge.com/2020/7/21/21333431/roblox-over-half-of-us-kids-playing-virtualparties-  
fortnite](https://www.theverge.com/2020/7/21/21333431/roblox-over-half-of-us-kids-playing-virtualparties-fortnite).

28 <sup>10</sup> See Roblox Corporation, Form 10-Q, at 59, March 31, 2022,

1           57.     The Robux currency is not a cryptocurrency, but a digital currency. This means  
2 transactions are not publicly recorded on a blockchain and Robux are not transferrable off platform.

3           58.     Roblox, however, knows and keeps track of the acquisition and transfer of its digital  
4 currency on its platform.

5           59.     Although it is a digital currency, Robux have actual monetary value. One Robux is  
6 currently equal to \$0.0125. Users can purchase Robux on Roblox at any time using a credit or debit  
7 card. For instance, Roblox sells 400 Robux for \$4.99 and 800 Robux for \$9.99. Additionally, users  
8 may subscribe to Robux Premium and receive a monthly allowance of Robux.

9           60.     All transactions on Roblox are executed using Robux. Robux can also be exchanged  
10 for real dollars.

11          61.     Until 2013, Roblox did not allow Robux to be exchanged for real dollars. Then in 2013,  
12 Roblox implemented the Developer Exchange Program, through which developers on the platform  
13 may exchange Robux for real world currencies.

14          62.     Roblox requires developers that wish to exchange Robux for cash to join the Developer  
15 Exchange Program so that Roblox can control the manner in which those developers utilize and  
16 interact with the Roblox ecosystem, and so Roblox can more easily monitor Robux exchanges.

17          63.     The advent of the Developer Exchange Program has attracted an enormous amount of  
18 users to the platform in search of riches in exchange for developing experiences or items on Roblox.  
19 The yearly payout to developers on the platform has continued to increase year over year, with Roblox  
20 paying out \$500 million to developers in 2021.

21          64.     With that kind of money being exchanged for Robux, it's no surprise the platform has  
22 also been overrun with predatory behavior, fraud, and gambling.

23           ***II. Roblox's Illegal Gambling Enterprise***

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27           [https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ea0f0408-7ea4-48f8-a127-  
28 fef1fdb69aa3.pdf](https://d18rn0p25nwr6d.cloudfront.net/CIK-0001315098/ea0f0408-7ea4-48f8-a127-fef1fdb69aa3.pdf)

1 65. Roblox, in conjunction with the Gambling Website Defendants, has directly assisted in  
2 creating the unregulated market of virtual casino games that run adjacent to and rely on the Roblox  
3 platform.

4 66. The extreme pace of growth of Roblox use among children has opened up a whole new  
5 market to online gambling enterprises. Children, who previously could not access the funds to  
6 participate in online gambling, now have, collectively, billions of Robux at their disposal.

7 67. Many times, children are able to gamble money on these virtual casinos without their  
8 parents' knowledge because they use Robux to facilitate the gambling transactions. Parents  
9 unwittingly provide the gambling funds to their children under the mistaken belief that their children  
10 are using Robux to purchase items that will enhance or accessorize a legitimate and/or harmless  
11 gaming experience.

12 68. As set forth herein, however, Roblox and the Gambling Website Defendants work  
13 together to divert adolescent and teenage users to third-party gambling websites where Robux can be  
14 gambled away on virtual games of chance, enriching both Roblox and the Gambling Website  
15 Defendants.

16 ***A. The Illegal Gambling Websites***

17 69. A growing secondary market for gambling is present on Roblox. This system is  
18 comprised of three primary third-party gambling websites (the "Illegal Gambling Websites") that  
19 feature games of chance such as coin flips, roulette, slot machines, treasure chests, as well as other  
20 pure gambling games like blackjack and dice.

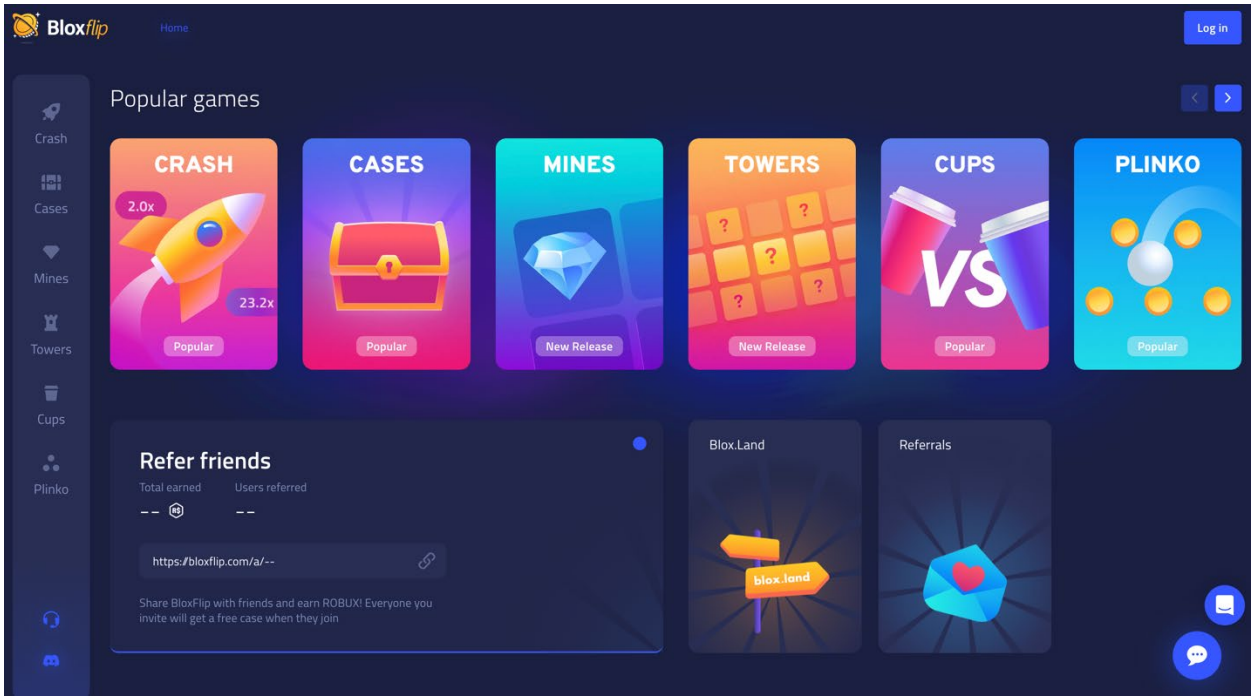
21 70. The three primary Illegal Gambling Websites are RBXFlip, which is operated by  
22 Satozuki; Bloxflip, which is operated by Studs; and RBLXWild, which is operated by BLXWild.

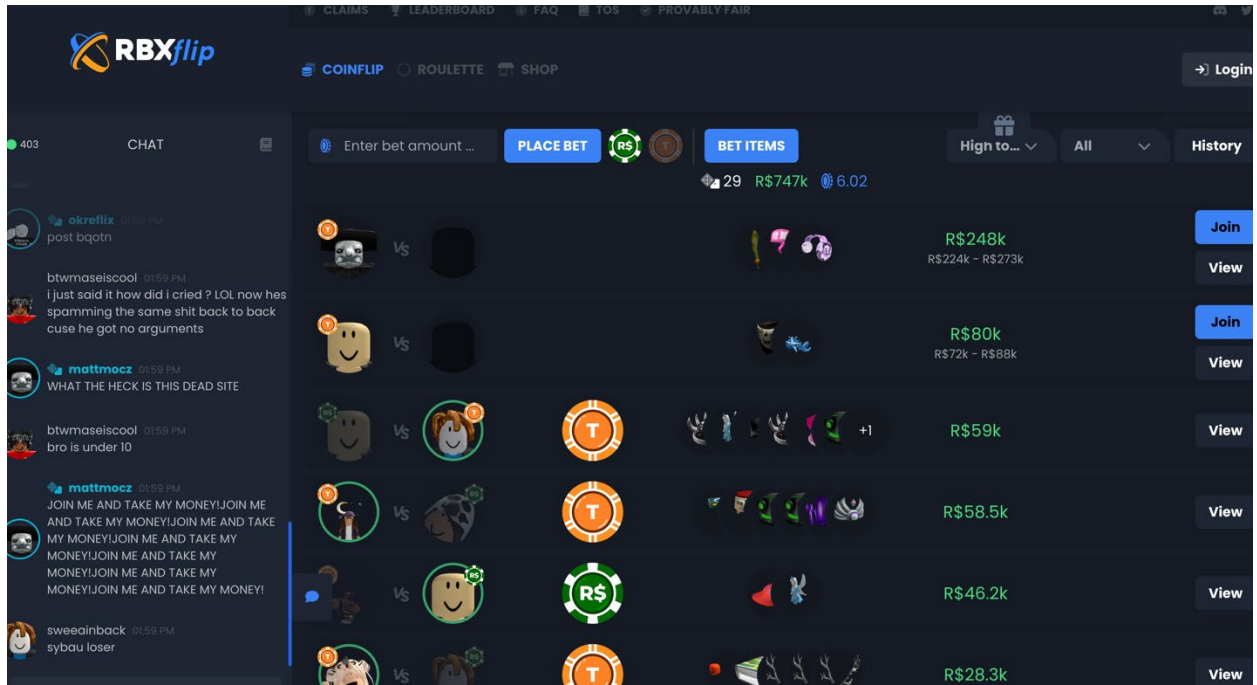
23 71. The Illegal Gambling Websites are each part of Roblox's Developer Exchange  
24 Program, allowing them to exchange Robux acquired from Roblox's minor users for real-world  
25 currency.

26 72. Each of the Illegal Gambling Websites operates on or in concert with Roblox and the  
27 Gambling Website Defendants, facilitating an exchange of Robux for gambling credits that occurs on  
28

1 the Roblox platform. Indeed, Robux never leave the Roblox platform until they are exchanged for  
2 cash. Once a minor user's credits are exhausted, the Gambling Website Defendants cash out their  
3 newly-acquired Robux and provide Roblox with its 30% transaction fee.

4 73. These websites all have substantially similar interfaces, which make it easy for a  
5 Roblox user to sign up, link their Roblox account, and begin gambling. The interface from Bloxflip  
6 and RBXFlip are set forth below:





74. The Illegal Gambling Websites are not registered with any state or licensed to operate a casino or online gambling operation.

75. Users of the Illegal Gambling Websites can deposit funds onto the website by linking their Roblox account and depositing Robux.

76. Prior to Roblox attaining popularity, these types of gambling websites did not have access to a vast underage online audience with funds to gamble.

77. However, because of the Roblox ecosystem, millions of children now have transferrable funds in the form of Robux that they can gamble with.

78. As a result, most of the Illegal Gambling Websites' audience is children who use Roblox. The Illegal Gambling Websites do not engage in any kind of age verification or identification processes to prevent underage users from participating.

79. Furthermore, although many of the games on the Illegal Gambling Websites are traditional gambling games, some are newer betting games such as "flip" and "crash," which are more like video games where bets are made, making them more appealing to a younger audience.

1 80. Because the exchange of Robux for gambling credits occurs on the Roblox platform,  
2 using Roblox’s technology and digital currency, Roblox has knowledge of these exchanges and  
3 facilitates them. When the Gambling Website Defendants cash out their ill-gotten gains, Roblox

4 81. also earns money on the cash-out fees. In short, all Defendants work together to enrich  
5 themselves and each other at the expense of their adolescent and teenage users.

6 ***1. RBXFlip***

7 82. RBXFlip was the first major third-party gambling website to operate with Roblox,  
8 launching in approximately 2019. As its name suggests—“RBX” is short for Robux—the site was  
9 designed for and dependent upon Roblox’s legions of minor users gambling away Robux purchased  
10 through Roblox’s ecosystem.

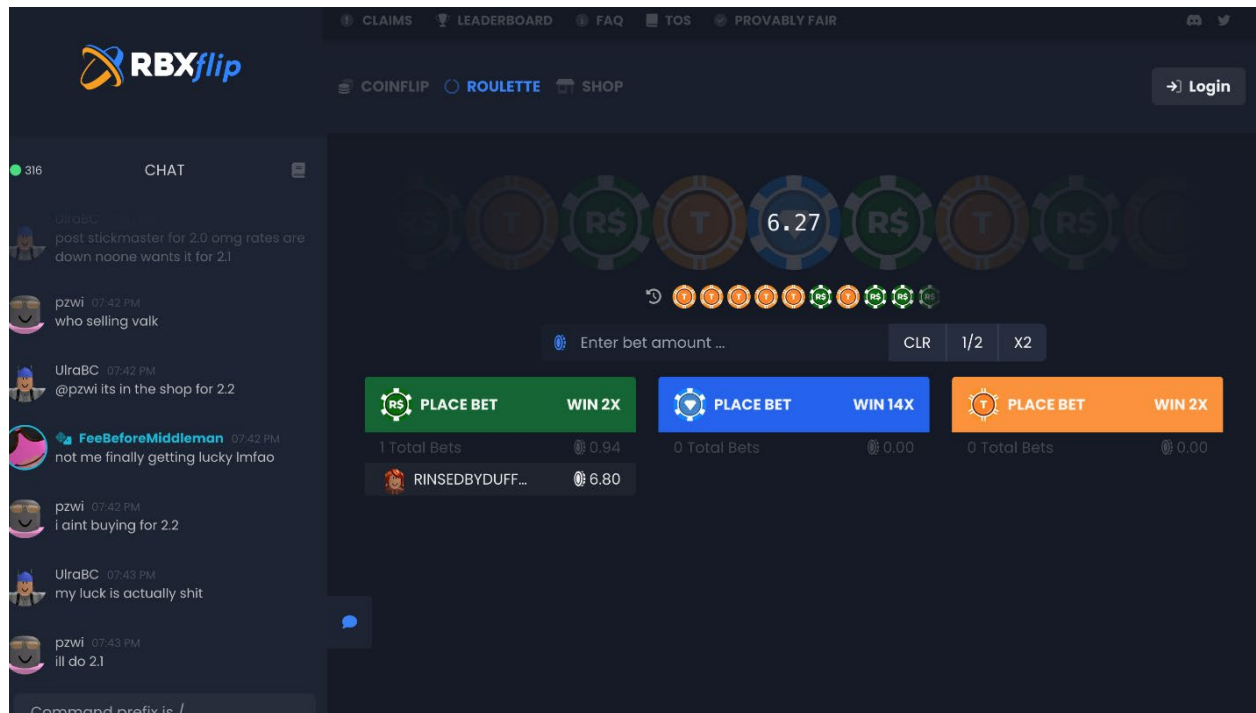
11 83. RBXFlip describes itself as “the leading peer 2 peer marketplace with fun & fair  
12 games” where users can bet Robux to play casino-style games.<sup>11</sup>

13 84. RBXFlip expressly acknowledges that it operates as a gambling website, stating in  
14 section 1.6 of its terms of service that the “games” contained on its website “shall mean Casino, Live  
15 Casino, Sportsbook, cards, and other games.”<sup>12</sup>

16 85. Before even signing in, RBXFlip prominently displays two casino “games” on its  
17 homepage: Coinflip and Roulette. Both “games” allow players to bet Robux:

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27 <sup>11</sup> <https://rbxflip.com/coinflip?modal=FAQ>

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



86. RBXFlip’s homepage further acknowledges, “Gambling means for the majority of our Users, entertainment, fun and excitement. But we also know that for some of our Users gambling has negative side effects.”<sup>13</sup>

87. But yet, RBXFlip incentivizes problematic gambling by offering “bonuses, coupons, loyalty points [and] prizes.”<sup>14</sup> To obtain these benefits, users must satisfy RBXFlip’s “wagering requirements,” which are “the total amount of bets you must stake before the bonus and any accrued winnings are transferred into your cash balance and can be withdrawn.”<sup>15</sup>

88. Although RBXFlip’s terms of service state that “Persons who are under age of 18 years are not allowed to use the Website and/or any services available on it,” the site’s own promotional material contradicts its claim. In a video entitled, “RBXFlip Login Tutorial And How to Win Roblox Gambling,” which has thousands of views, an RBXFlip spokesperson states that the first “Requirement to Gamble” on “our” website is that the Roblox user has an “Account age 13+.”<sup>16</sup>

89. The RBXFlip spokesperson continues by demonstrating how any user can connect

<sup>13</sup> <https://rbxflip.com/coinflip?modal=responsible-gambling>

<sup>14</sup> <https://rbxflip.com/coinflip?modal=ToS>, at 16.7

<sup>15</sup> <https://rbxflip.com/coinflip?modal=ToS>, at 16.10.2.11.

<sup>16</sup> <https://www.youtube.com/watch?v=2jwhcFgmB6Q>

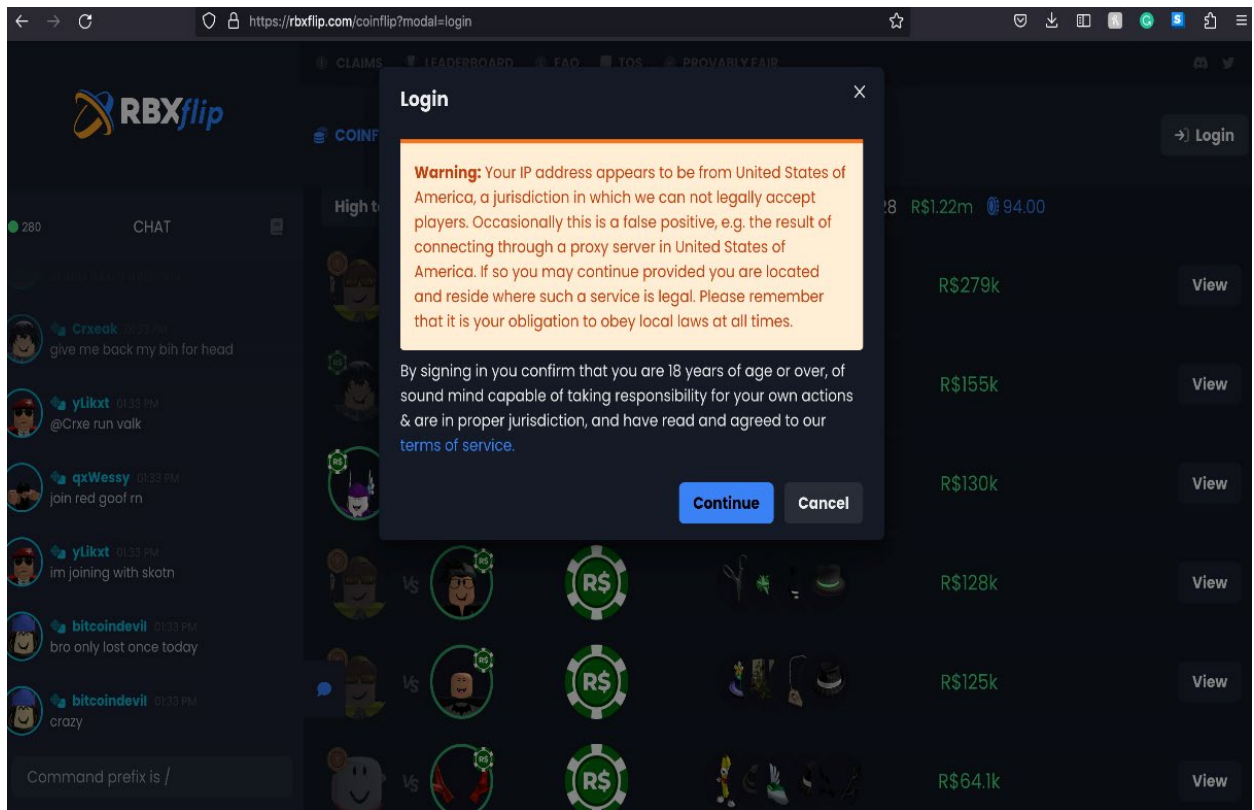
1 their Roblox account to RBXFlip and how, when gambling on its website, the user’s Robux are  
2 “sent to one of our storage bots for it to hold for the duration of the game.” This storage bot is  
3 located on Roblox’s website and uses Roblox’s technology to exchange Robux for gambling credits,  
4 with Roblox’s knowledge. The storage bot, or RBXFlip itself, is also part of Roblox’s Developer  
5 Exchange, allowing RBXFlip to cash out its ill-gotten Robux for real-world currency. All  
6 participants in the Developer Exchange must register with Roblox, meaning Roblox has a full  
7 understanding of the entities that participate through its Developer Exchange.

8 90. Minor users are easily able to create an account by copy and pasting their Roblox  
9 “cookie”—their unique security code—when prompted. This “cookie” is information Roblox  
10 generates on its website and tracks, thus providing it with knowledge of when a Roblox user’s  
11 “cookie” is linked to another website such as RBXFlip and facilitating the transfer of Robux to this  
12 illegal online casino.

13 91. RBXFlip also fails to utilize any age verification measures, meaning that any user,  
14 regardless of their actual age, can access the site and place bets using their Robux.

15 92. While RBXFlip states that its casino games are not accessible “from the United States,”  
16 this warning does not actually prohibit users in the United States from gambling on the website and is  
17 easily bypassed by pressing a bright blue “continue” button that appears on the website’s entry screen,  
18 as shown below:





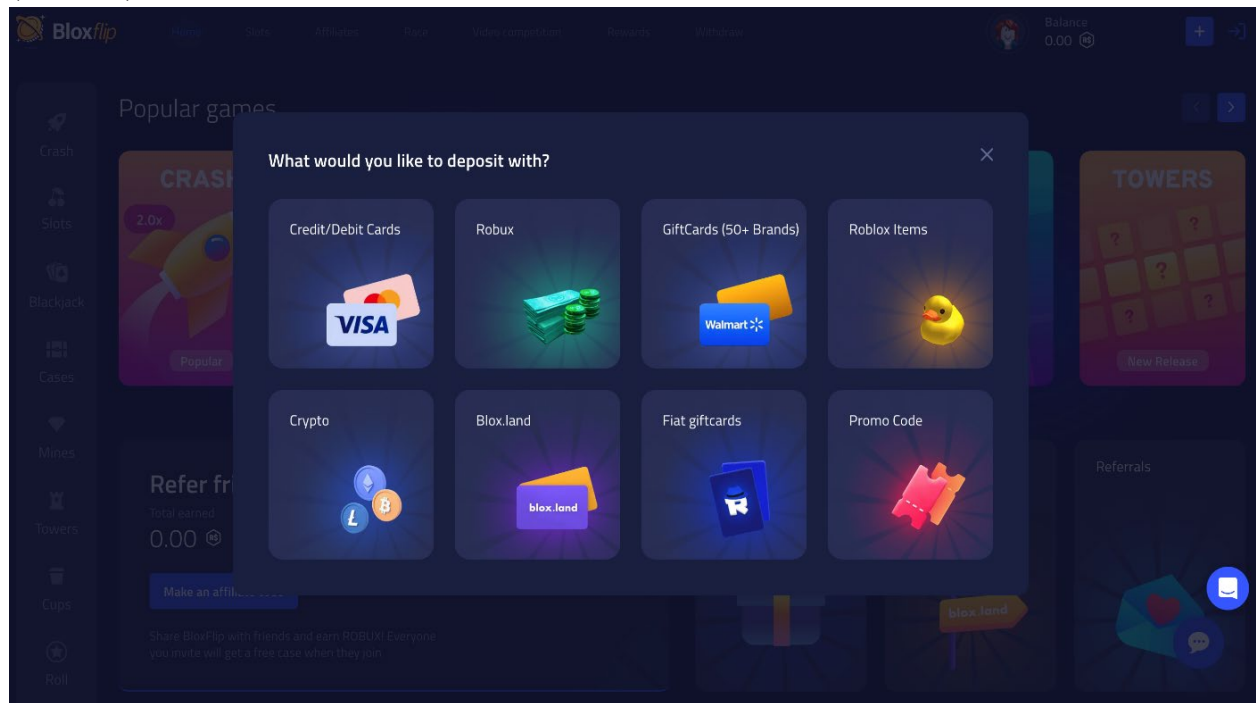
93. Roblox has never attempted to prevent RBXFlip from operating its online casino using Robux. Indeed, Roblox has only tried to curtail RBXFlip's conduct in one instance: in 2019, Roblox demanded that RBXFlip stop using its copyrights on the RBXFlip website. Roblox did not, at this time or any other, demand that RBXFlip cease operating a gambling operation dependent upon the Roblox ecosystem and the Robux digital currency.

94. RBXFlip does an enormous amount of its business in Robux. In December 2021, RBXFlip's owner claimed that the platform generated upwards of 10 million Robux on a daily basis.

## 2. Bloxflip

95. Bloxflip, like RBXFlip, is an online casino catering to Roblox's adolescent and teenage users. As of 2022, it was one of the most visited websites in the world with over 5.7 million monthly visitors.

1 96. Bloxflip describes itself as a “betting service that allows users to play a variety of  
2 chance-based games (“Games”) using . . . the virtual in-game currency used by players of Roblox  
3 (“Robux”).”<sup>17</sup>



15 97. The site further declares that it is “the #1 social casino for wagering ROBUX!”<sup>18</sup>

16 98. When a user navigates to Bloxflip’s page, they are encouraged to “Deposit . . ROBUX  
17 . . . to receive a balance on the site to start playing!”<sup>19</sup>

18 99. Bloxflip’s homepage features several ways to gamble a user’s Robux, with games like  
19 “Crash,” “Blackjack,” “Slots,” “Plinko,” and “Slide (Roulette),” and includes a live feed of each “bet”  
20 and the current “payout” from each of these casino games.<sup>20</sup>

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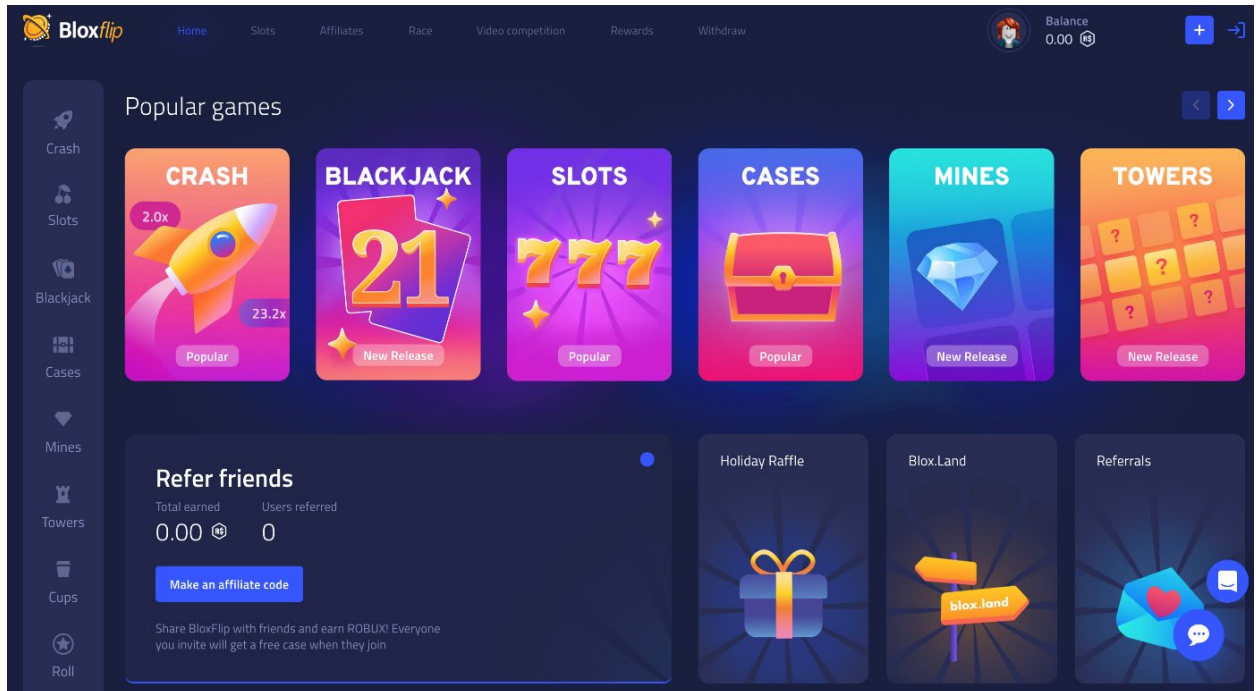
24

25 <sup>17</sup> <https://bloxflip.com/terms>

26 <sup>18</sup> <https://bloxflip.com/>, at FAQ

27 <sup>19</sup> <https://bloxflip.com/>, at FAQ

28 <sup>20</sup> A tutorial for how to play each game can be found on Youtube in the video entitled, “A Beginners Guide to BloxFlip.” See <https://www.youtube.com/watch?v=35Lkf3SBwJU&t=7s>.



Live feed

All bets High wins Lucky wins

Game	Username	Time	Bet	Multiplier	Payout
Cases	Fallguyfortnitebob	17:22	435	1.23 x	+ 537
Plinko	321xrellik	17:22	50	1.00 x	0
Slots	linus_minus08	17:22	75	0.82 x	+ 61.7
Slots	jucatorminecraft	17:22	4,800	1.00 x	+ 4,800
Mines	JAKEQUIL123	17:22	50	0.00 x	- 50
Case Battle	Frororao	17:22	41	1.83 x	+ 75
Towers	urfatni	17:22	50	2.02 x	+ 101.25

100. Although Bloxflip claims that users must be over eighteen to gamble, the website does not use any age verification software and users under the age of eighteen are freely able to access the website and gamble. All that is needed to log in to Bloxflip is a “Roblox username.”

101. Further, Bloxflip encourages minor users to promote its illegal gambling website by offering free Robux to users who promote Bloxflip on the popular social media product TikTok.

102. For example, Bloxflip entered into a paid partnership with TikTok influencer RizJhadan\_roblox, who has over 250,000 followers, to advertise its illegal gambling website to

1 children. One video, entitled, “Finding Roblox Games, So you Don’t Have Too!!! Check Our BloxFlip  
2 in Bio!!!” is marked as a “paid partnership,” and has been viewed over 1.7 million times and “liked”  
3 over 113,000 times.<sup>21</sup> In this sponsored post, the TikTok influencer tells his adolescent audience that  
4 in just “10 minutes” he was able to win “over 100k plus” worth of Robux, and states that “you guys  
5 can too.”

6 103. As the above example demonstrates, Bloxflip was designed to attract Roblox’s minor  
7 users who could illegally gamble on the site using their Robux. For this reason, Bloxflip entered a paid  
8 partnership with an influencer whose name incorporates the word “roblox,” and the illegal gambling  
9 website’s name itself is a reference to the Roblox gaming platform.

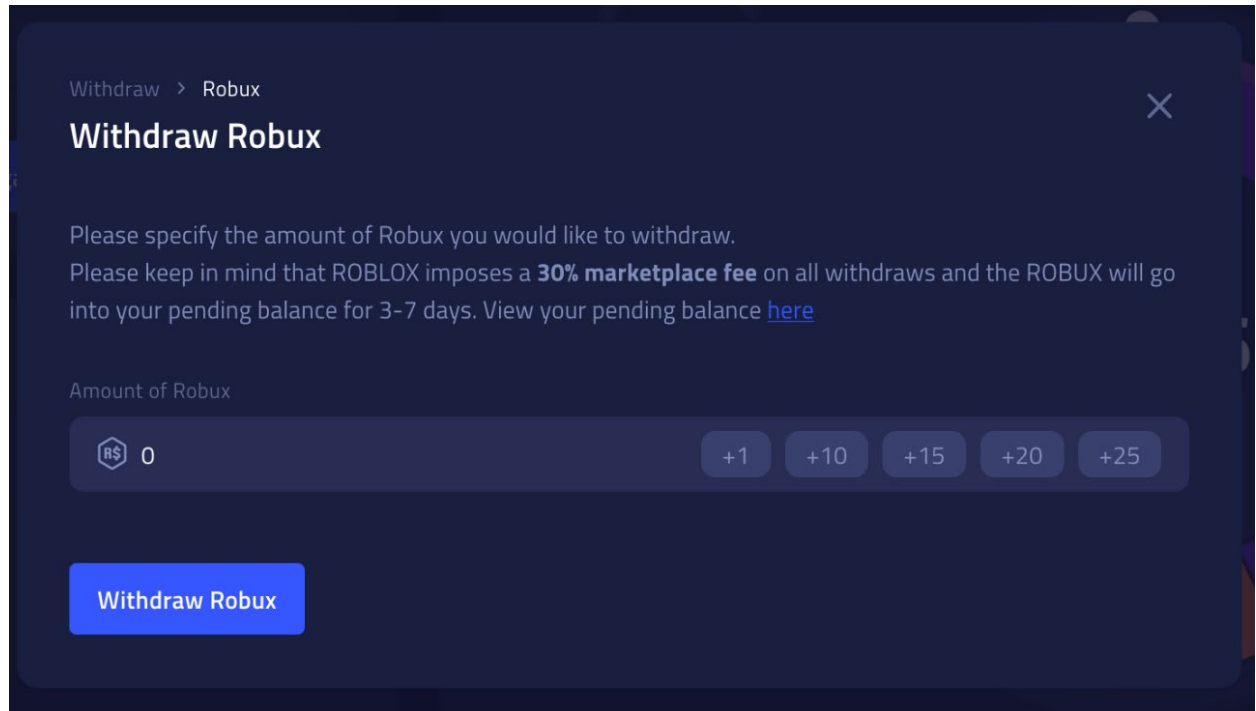
10 104. Although Bloxflip’s website states that “Robux have no cash value and are for  
11 entertainment purposes only,” its terms of service describe the process by which a user can “Cashout  
12 your ROBUX into your account.”<sup>22</sup>

13 105. When a user attempts to withdraw Robux from Bloxflip’s casino website, Bloxflip  
14 notifies the user that “ROBLOX imposes a 30% marketplace fee on all withdraws and the ROBUX  
15 will go into your pending balance for 3-7 days.”<sup>23</sup>

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26 \_\_\_\_\_  
27 <sup>21</sup> [https://www.tiktok.com/@rizjhadn\\_roblox/video/7144340043300097281?lang=en](https://www.tiktok.com/@rizjhadn_roblox/video/7144340043300097281?lang=en)

28 <sup>22</sup> <https://bloxflip.com/terms>

<sup>23</sup> *Id.* (emphasis in original)

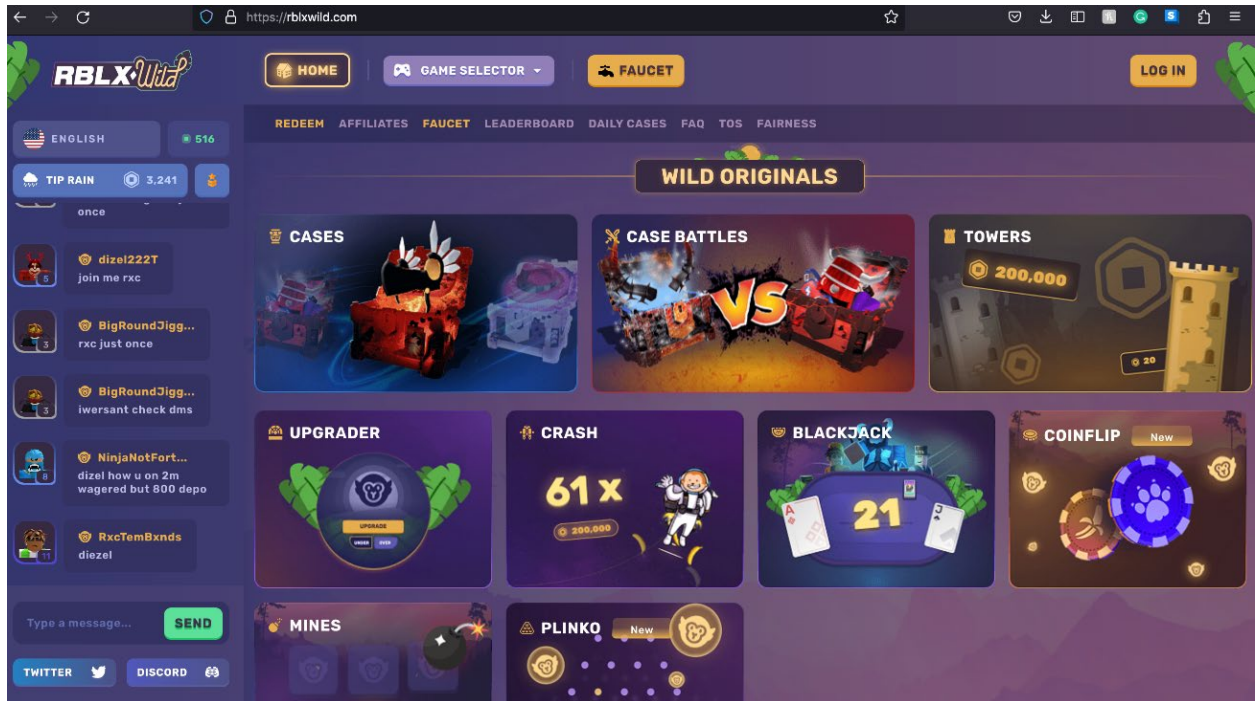


106. Bloxflip, like RBXFlip, uses a storage bot to accept and hold minor users' Robux on the Roblox platform. This storage bot is located on Roblox's website and uses Roblox's technology to exchange Robux for gambling credits, with Roblox's knowledge. The storage bot, or Bloxflip itself, is also part of Roblox's Developer Exchange, allowing Bloxflip to cash out its ill-gotten Robux for real-world currency. All participants in the Developer Exchange must register with Roblox, meaning Roblox has a full understanding of the entities that participate through its Developer Exchange.

107. In a 2022 interview, Bloxflip's founder stated that he was "inspired" to create Bloxflip when he "saw the success of RBXFlip."<sup>24</sup> He further claimed that he designed the website to offer "PvP gambling" that focused on betting with Robux, which "open[ed] [the site] to more people." The Bloxflip founder also proclaimed that Bloxflip was the "#1 Roblox gambling site." Again, Bloxflip, like RBXFlip, is intended to capture Roblox's audience of minors, all while enriching both the operators of the website and their collaborators at Roblox.

### 3. *RBLXWild*

<sup>24</sup> <https://www.youtube.com/watch?v=yFaR33G5yhQ>



108. RBLXWild opens to a homepage that features many games in which minors may gamble, including “BlackJack,” “Coinflip,” “Plinko,” and more.

109. RBLXWild’s homepage is designed to appeal to children and resemble a virtual arcade, with the website featuring cartoonish images to advertise each casino game.

110. RBLXWild exchanges Robux for gambling credits on the Roblox platform using a storage bot, just like the other Gambling Website Defendants. This storage bot is located on Roblox’s website and uses Roblox’s technology to exchange Robux for gambling credits, with Roblox’s knowledge. The storage bot, or RBLXWild itself, is also part of Roblox’s Developer Exchange, allowing RBLXWild to cash out its ill-gotten Robux for real-world currency. All participants in the Developer Exchange must register with Roblox, meaning Roblox has a full understanding of the entities that participate through its Developer Exchange.

111. The site explains that users can increase their “site balance,” and thereby continue to gamble, “by depositing more . . . Robux.”<sup>25</sup>

<sup>25</sup> <https://rblxwild.com/?modal=general-tos>

1 112. RBLXWild, like the other Illegal Gambling Websites, also allows users to withdraw  
2 Robux from their accounts, explaining that any amount withdrawn will be reduced by the “30% fee  
3 that Roblox charges.”

4 113. Although RBLXWild claims that users must be over eighteen to access the site, it  
5 employs no age verification mechanisms to prohibit those under the age of eighteen from accessing  
6 the website and placing bets.

7 114. Further, RBLXWild pays social media influencers to advertise and promote  
8 RBLXWild to children.<sup>26</sup> Several videos available on YouTube, for example, suggest that minor  
9 users can make enormous profits by gambling on RBLXWild. These videos have titles such as “I  
10 won over 5 million R\$ In this Battle! (RBLXWild),”<sup>27</sup> and “I Won R\$50,000 On RBLXWild! (Real  
11 Balance).”<sup>28</sup> The use of “R\$” in these titles and others is a reference to Robux.

12 115. Indeed, the name RBLXWild is itself a reference to Roblox and its digital currency,  
13 Robux, and the site is designed to attract Roblox’s minor users who will wager the ecosystem’s digital  
14 currency, all while RBLXWild and Roblox share the profits.

15 116. As set forth herein, each of the Illegal Gambling Websites works closely with Roblox  
16 and is intended to attract Roblox’s minor users, who can freely wager their Robux. B. Roblox’s  
17 Facilitation, Control, and Profit Sharing with the Illegal Gambling Websites

18 117. Roblox knowingly and intentionally allows the Illegal Gambling Websites to operate  
19 in the Roblox ecosystem, access the Roblox platform, and facilitates the accessibility of illegal online  
20 casinos to its minor users. Further, because each of the Gambling Website Defendants must register  
21 themselves, or through a proxy, in Roblox’s Developer Exchange Program, Roblox knows and  
22 understands that these entities move large quantities of Robux through the Roblox platform and in  
23 exchange for real-world currency.

24 118. Because Robux is not a cryptocurrency, but merely a digital currency, it cannot be  
25

26 <sup>26</sup> <https://www.youtube.com/watch?v=2OPF9PWvi8A> (stating that this video, with over 60,000  
views, is sponsored by “Wild”).

27 <sup>27</sup> <https://www.youtube.com/watch?v=LzVi8Rd-99E>

28 <sup>28</sup> <https://www.youtube.com/watch?v=Odf3I9X3nZM>

1 removed from the Roblox platform. This means that when a user “deposits” Robux onto an Illegal  
2 Gambling Website, something else is really going on. The user’s Robux do not leave the Roblox  
3 platform, but instead are transferred to another Roblox account controlled by a Gambling Website  
4 Defendant. Meanwhile, the user’s Illegal Gambling Website account shows that it holds the equivalent  
5 amount of gambling credits, which are also called “Robux” by each of the Gambling Website  
6 Defendants.

7 119. Roblox monitors and records each of these illegal transactions, yet does nothing to  
8 prevent them from happening.

9 120. Here is how the practice works. When a Roblox user visits an Illegal Gambling  
10 Website, the user links their Roblox account to the gambling website by providing their login  
11 credentials or Roblox Security Token. Once the Illegal Gambling Website has this information, the  
12 user enters the amount of Robux they wish to deposit. The Illegal Gambling Website, now having  
13 control of the user’s account, automatically initiates a removal of Robux from the user’s account  
14 without any additional input from the user and then credits the user’s gambling account with the equal  
15 amount of Robux.

16 121. However, the Illegal Gambling Website is not actually transferring Robux from the  
17 Roblox platform to the Illegal Gambling Website. Instead, the Gambling Website initiates a  
18 transaction on Roblox between the user and a “stock” Roblox account (the “Stock Account”)  
19 controlled by the Illegal Gambling Website. Because Roblox does not allow users to gift Robux to  
20 each other, the Illegal Gambling Website initiates a sale of a worthless item or experience from the  
21 Stock Account to the user for the amount of Robux the user wishes to deposit on the gambling website.

22 122. The Illegal Gambling Website now holds the user’s Robux in their Stock Account  
23 on the Roblox system, and the user’s account on the Illegal Gambling Website is credited with a  
24 digital credit also labeled “Robux,” with which the user can now gamble.

25 123. Upon conclusion of gambling, a user may wish to withdraw their Robux from the  
26 Illegal Gambling Website. Just like the initial deposit process, the withdrawal process is not an actual  
27 withdrawal, but merely a subtraction of the “Robux” on the gambling account and transfer actual  
28



1 Robux back to the user’s Roblox account by one of the Illegal Gambling Website’s Stock Accounts.  
2 For instance, after the withdrawal of Robux, a user can see that their account now contains the Robux  
3 withdrawn from the Illegal Gambling Website. If the user reviews their “Sale of Items” page on their  
4 Roblox account, they can see that they received those Robux in exchange for the sale of a useless, or  
5 dummy, item or experience.

6 124. However, the user will notice that after the withdrawal, their balance of Robux will be  
7 less than the amount they had on the Illegal Gambling Website. This is because Roblox takes a 30%  
8 fee on all transactions on the platform.

9 125. For example, if the user withdrew 1000 Robux from an Illegal Gambling Website, they  
10 would only receive 700 Robux after the transfer from the Stock Account and Roblox will take the  
11 other 300 as a transaction fee.

12 126. Roblox also takes a 30% fee on the original “deposit” transaction that occurs as a result  
13 of the user “depositing” Robux onto the Gambling Website.

14 127. Therefore, Roblox collects a 30% fee off every transaction that deposits or withdraws  
15 funds on the Illegal Gambling Websites, earning Roblox millions in real-world revenue.

16 128. As described above, Roblox earns nearly all of its \$2 billion in annual revenue from  
17 selling users Robux and charging transaction fees on all transactions on the platform.

18 129. Robux are an item of value equal to real-world currency. As described above, they have  
19 an exchange rate with the dollar and Roblox regularly pays out hundreds of millions of dollars to  
20 developers on its Robux exchange.

21 130. As a result, Roblox profits from the gambling losses incurred by its users on the Illegal  
22 Gambling Websites and even charges fees on the transactions that facilitate the gambling.

23 131. Furthermore, Roblox monitors and facilitates these exchanges of Robux, and tacitly  
24 approves the Illegal Gambling Websites’ use of Stock Accounts to “hold” Robux in exchange for  
25 gambling credits that Roblox’s minor users can utilize to place bets on the Illegal Gambling Websites.

26 ***C. Roblox Knows These Transactions are Facilitating Illegal Gambling but Continues to***  
27 ***Allow the Transactions and Collect Fees Anyway.***  
28

1 132. Roblox knows that the Gambling Website Defendants use these Stock Accounts to  
2 facilitate transactions on the platform and that they are accessing Roblox servers in order to facilitate  
3 Illegal Gambling Website user transactions. Indeed, all such Accounts are required to register with  
4 Roblox through its Developer Exchange Program.

5 133. Indeed, Roblox monitors each and every transaction for Robux on its website.

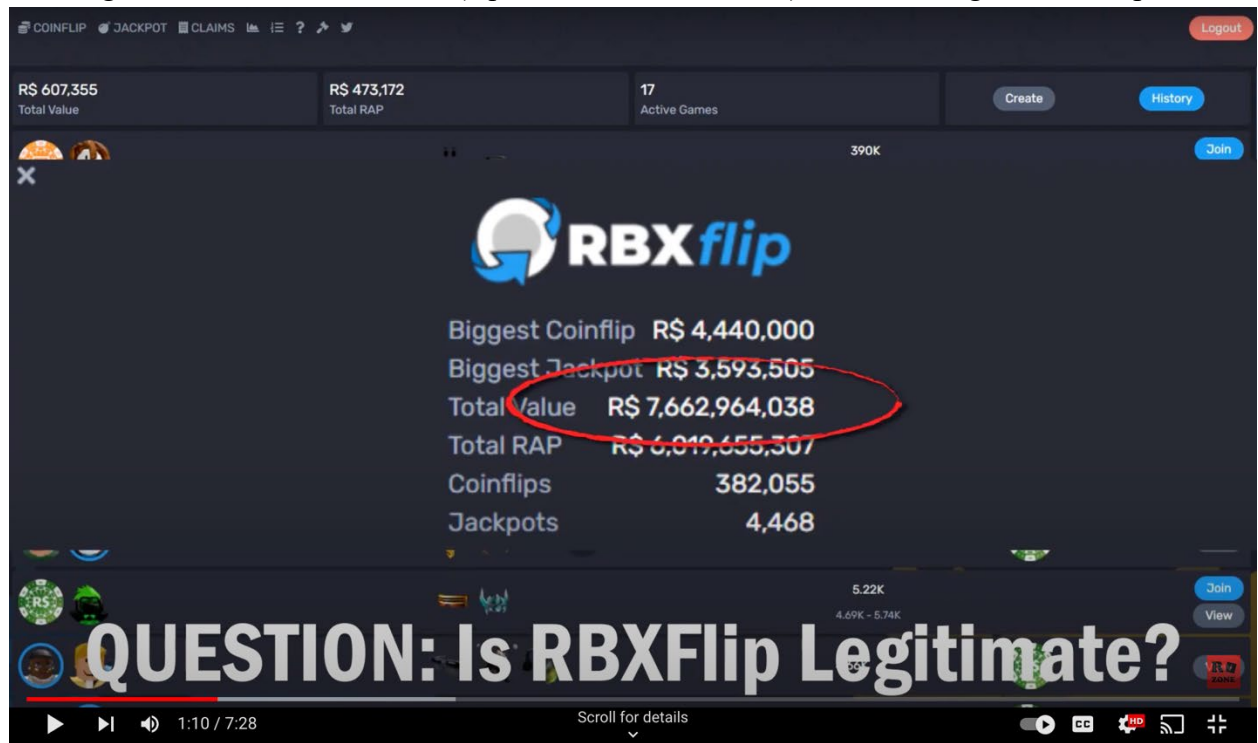
6 134. Roblox has acknowledged in court filings that it can identify, track, and disable  
7 accounts using the Roblox platform for illegal purposes. For example, in a March 28, 2023, filing in  
8 the Northern District Court of California, Roblox and the plaintiffs filed a Notice of Motion and  
9 Motion in Support of Class Settlement as part of *Jane Doe v. Roblox Corp.*, No. 3:21-cv-03943-WHO  
10 (N.D. Cal. Mar. 28, 2023). The filings stated that as part of the settlement terms, Roblox and the  
11 plaintiff had identified 311 accounts on its platform that spent over 80,000 Robux (equaling over  
12 \$1000) engaging in suspicious behavior like purchasing the same virtual item from the same seller  
13 multiple times and creating and purchasing their own virtual item, which is exactly the procedure the  
14 Gambling Website Defendants utilize to exchange Robux for gambling credits. Roblox excluded these  
15 accounts from the settlement class and named them the “laundering exclusion” because it suspected  
16 they were engaged in money laundering or other suspicious activities.

17 135. The “laundering exclusion” class in Roblox’s settlement statements describes the type  
18 of transactions that the owners of the Illegal Gambling Websites use to facilitate the transfer of Robux  
19 on and off of the gambling platforms.

20 136. Roblox admits that it can identify such suspicious activity and even labels it as so but  
21 refuses to ban these accounts. Furthermore, Roblox continues to earn a 30% commission on each of  
22 these suspicious transactions, reaping extraordinary profits.

23 137. Roblox can also monitor and identify third-party websites, such as the Illegal Gambling  
24 Websites, that access its computers and servers in order to facilitate the gambling transactions. Indeed,  
25 Roblox actively monitors these websites and keeps track of their exchange of Robux for gambling  
26 credits. Many of the Illegal Gambling Websites claim to have had millions of dollars’ worth of Robux  
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28

1 wagered on their platforms. For example, RBXFlip’s owner shared a screenshot in a 2020 interview  
2 showing that over 7 billion Robux (equal to over \$70 million) had been wagered on the platform.<sup>29</sup>



15 138. Further, the owner stated in 2021, that RBXFlip made ten times as much revenue that  
16 year as it had previously, indicating the amount of Robux bet on that one platform is likely in the  
17 hundreds of millions.<sup>30</sup>

18 139. Roblox cannot credibly claim it is unaware of the Illegal Gambling Websites since  
19 numerous Roblox-affiliated social media influencers have gone public about their concerns that the  
20 site is permitting children to be preyed upon.

21 140. As far back as at least 2019, Roblox social media celebrity “KreekCraft”  
22 (@KreekCraft), who has 1.3 million followers, tweeted that he “Heard a lot about rbxflip today. For  
23 the people unaware it’s a Roblox robux gambling site. 1. It is ILLEGAL for anyone not an adult to

24

25 <sup>29</sup> RoZone, “Interviewing The FOUNDER Of RBXFlip!,” YouTube (Dec. 28, 2020, at 1:08),  
<https://www.youtube.com/watch?v=J88I7Y3JF-s>.

26 <sup>30</sup> RoZone, “Interviewing The FOUNDER Of RBXFlip | 2021,” YouTube (Dec. 5. 2021),  
27 <https://www.google.com/search?q=Interviewing+The+FOUNDER+Of+RBXFlip+%7C+2021&oq=I>  
28 [nterviewing+The+FOUNDER+Of+RBXFlip+%7C+2021&aqs=chrome..69i57j69i61.453j0j7&sourceid=chrome&ie=UTF-8#fpstate=ive&vld=cid:88c7b884,vid:ELeXsMr2wco](https://www.google.com/search?q=Interviewing+The+FOUNDER+Of+RBXFlip+%7C+2021&aqs=chrome..69i57j69i61.453j0j7&sourceid=chrome&ie=UTF-8#fpstate=ive&vld=cid:88c7b884,vid:ELeXsMr2wco).

1 gamble. 2. Don't use it. You'll be banned." Roblox frequently interacts with "KreekCraft" on social  
2 media and monitors his Twitter account. As but one example:

3  **Roblox**  10.7K Tweets **Follow**

4  **KreekCraft**   @KreekCraft · Mar 25

5 This is just the beginning.

6 Our ultimate goal is to take Roblox to the next level. To do things nobody  
7 has ever done before in this space.

8 We have so many ambitious ideas and projects in the works. It's going to  
9 be a great year.

10 See you next weekend for the next announcement

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22 karl :) and 2 others

23  311  415  5,738  262.3K 

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25  **Roblox**  @Roblox · Mar 26

26 Replying to @KreekCraft @KarlJacobs\_ and 2 others

27 So excited for what's to come!

28

1 141. Accordingly, Roblox knew or should have known that one of its primary social media  
2 personalities was raising alarms about RBXFlip. But Roblox did nothing because, unbeknownst to  
3 “KreekCraft” and his followers, Roblox was making significant profit off RBXFlip’s gambling  
4 operation.

5 142. Further, in a January 2019 tweet sent to its more than 95,000 followers, the popular  
6 Twitter account “Roblox Trading News” tweeted that it “Got into an argument with the owner of the  
7 Roblox gambling site @rbxflip in which he bragged about how he was a ‘multi-millionaire’ off his  
8 site only to edit that portion out after I replied, ‘You made all your money off the backs of children  
9 losing thousands of dollars.’”<sup>31</sup> “Roblox Trading News” is a social media personality followed and  
10 monitored by Roblox.

11 143. Another popular Roblox social media personality, “SharkBlox” (@SharkBloxYT),  
12 with over 196,000 followers, replied to this tweet and stated that these sites [the Illegal Gambling  
13 Websites] were “Also probably gonna get kids addicted to gambling. Sites like these suck. No body  
14 wins at gambling except the website owners, I just wish more people realized that.”<sup>32</sup>

15 144. Additionally, both BloxFlip and RBLXWild have mounted social media ad campaigns  
16 with several videos totaling over one million views:  
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27 <sup>31</sup> <https://twitter.com/SharkBloxYT/status/1616172836736876552>

28 <sup>32</sup> *Id.*

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https://www.youtube.com/results?search\_query=bloxflip&sp=CAM%253D

bloxflip

**DROPPING 1,000 BALLS ON PLINKO... i won**  
321K views · 8 months ago  
NoobTM  
today we played plinko on stake and DROPPING 1000 BALLS ON PLINKO... i won ...  
4K

**XQC GOES ON AN INSANE PLINKO RUN WINNING HUGE!**  
302K views · 11 months ago  
DAILY Gambling  
XQC turned on his gambling stream and instantly went on a MASSIVE plinko heater winning huge profits! THIS IS NOT AN ...

**A BEGINNERS GUIDE TO BLOXFLIP**  
236K views · 9 months ago  
RoZone  
This video offers the completed beginners guide on how to Use bloxflip, showing everything from Deposits & Withdrawals, to an ...  
Intro | Depositing | Cashout | Cases | Mines | Game modes | Hard mode | Cups | Jackpot | Roulette |... 14 chapters

Shorts

bloxflip

**How to make profit on Bloxflip (Go from 1k to 100k, NEVER LOSE AGAIN)**  
113K views · 5 months ago  
Star  
Tags: (ignore) t@gs: bloxflip,bloxflip hack,bloxflip predictor,bloxflip crash hack,bloxflip glitch,blox flip hack,blox flip script,roblox ...

**Bloxflip 5 ROBUX TO ??? (ALL IN)**  
109K views · 9 months ago  
Mxshz  
I think its safe. Just don't do more mine lmao... #bloxflip #robux.

**Is BloxFlip Safe?**  
109K views · 1 year ago  
RoZone  
As Bloxflip is quite a new website to the roblox black market, a lot of people are concerned on its safety and whether or not it's a ...  
Secure Ddos Protection Service | Secure Vault 2 moments

**100K ROBUX! OMG! ||TUTORIAL HOW TO USE BLOXFLIP #roblox #shorts #robux**  
90K views · 1 year ago  
PsyShorts

1 145. Roblox is well aware of these highly visible campaigns to entice Roblox’s minor  
2 users to gamble and, although certain social media personalities may not know it, Roblox has been  
3 greatly enriched by these campaigns.

4 146. Roblox is complicit in this illegal gambling scheme because it works in concert with,  
5 and continues to allow, the Illegal Gambling Websites to operate on its platform and assesses a 30%  
6 fee on all transactions of Robux to and from the Illegal Gambling Websites. This means Roblox has  
7 likely earned hundreds of millions in fees charged on transactions related to illegal gambling.

8 147. Furthermore, Roblox executives are personally aware of the Illegal Gambling  
9 Websites’ existence and Roblox knows that the Websites do nothing to prevent its minor users from  
10 gambling on the Websites with Robux.

11 148. Roblox understands the ease with which minor users are able to link their Robux wallet  
12 to the Illegal Gambling Websites and begin illegally gambling, but has failed for years to prevent such  
13 transactions.

14 ***III. Plaintiffs’ Experiences***

15 ***A. David L. Gentry***

16 149. Plaintiff David L. Gentry is the parent and next friend of L.G. L.G. is a minor who  
17 plays Roblox using his own user-created account. Minor Plaintiff L.G. is a resident of South Carolina  
18 and is represented in this action by his father and next friend, Plaintiff David L. Gentry.

19 150. Minor Plaintiff L.G. has purchased thousands of Robux through the use his parents’  
20 credit card linked to his Roblox account and gift cards that were under his complete ownership and  
21 control.

22 151. Minor Plaintiff L.G. utilized his in-game currency to gamble on the Illegal Gambling  
23 Websites.

24 152. Specifically, Minor Plaintiff L.G. has paid money to RBLXWild, RBXFlip, BloxFlip  
25 and other Illegal Gambling Websites through Defendant Roblox.

26 153. Minor Plaintiff L.G. has lost thousands of Robux playing gambling games on  
27 RBLXWild, RBXFlip, BloxFlip and other Illegal Gambling Websites.

1 154. At the time that Minor Plaintiff L.G. was wagering Robux on RBLXWild, RBXFlip,  
2 BloxFlip and other Illegal Gambling Websites, Plaintiff David L. Gentry was not aware that his son  
3 was using Robux to engage in gambling activities.

4 ***B. Osmany Rodriguez***

5 155. Plaintiff Osmany Rodriguez is the parent and next friend of O.R. O.R.is a minor who  
6 plays Roblox using his own user-created account. Minor Plaintiff O.R.is a resident of Florida and is  
7 represented in this action by his father and next friend, Plaintiff Osmany Rodriguez.

8 156. Minor Plaintiff O.R. has purchased thousands of Robux through the use of his parents'  
9 credit cards linked to his Roblox account and gift cards that were under his complete ownership and  
10 control.

11 157. Minor Plaintiff O.R. utilized his in-game currency to gamble on the Illegal Gambling  
12 Websites.

13 158. Specifically, Minor Plaintiff O.R. has paid money to RBXFlip and other Illegal  
14 Gambling Websites through Defendant Roblox.

15 159. Minor Plaintiff O.R. has lost thousands of Robux playing gambling games on RBXFlip,  
16 and other Illegal Gambling Websites.

17 160. At the time that Minor Plaintiff O.R. was wagering Robux on RBXFlip and other Illegal  
18 Gambling Websites, Plaintiff, Osmany Rodriguez was not aware that his son was using Robux to  
19 engage in gambling activities.

20 ***C. Joshua R. Munson***

21 ***1. Minor Plaintiff D.C.***

22 161. Plaintiff Joshua R. Munson is the parent and next friend of D.C. D.C. is a minor who  
23 plays Roblox using his own user-created account. Minor Plaintiff O.R.is a resident of Georgia and is  
24 represented in this action by his father and next friend, Plaintiff Joshua R. Munson.

25 162. Minor Plaintiff D.C. has purchased thousands of Robux through the use of his parents'  
26 credit card linked to his Roblox account.



1 163. Minor Plaintiff D.C. utilized his in-game currency to gamble on the Illegal Gambling  
2 Websites.

3 164. Specifically, Minor Plaintiff D.C. has paid money to RBXFlip, BloxFlip and other  
4 Illegal Gambling Websites through Defendant Roblox.

5 165. Minor Plaintiff D.C. has lost thousands of Robux playing gambling games on RBXFlip,  
6 BloxFlip and other Illegal Gambling Websites.

7 166. At the time that Minor Plaintiff D.C. was wagering Robux on RBXFlip, BloxFlip and  
8 other Illegal Gambling Websites, Plaintiff Joshua R. Munson was not aware that his son was using  
9 Robux to engage in gambling activities.

10 **2. Minor Plaintiff J.M.**

11 167. Plaintiff Joshua R. Munson is the parent and next friend of J.M. J.M. is a minor who  
12 plays Roblox using his own user-created account. Minor Plaintiff O.R. is a resident of Georgia and is  
13 represented in this action by his father and next friend, Plaintiff Joshua R. Munson.

14 168. Minor Plaintiff J.M. has purchased thousands of Robux through the use of his parents'  
15 credit card linked to his Roblox account.

16 169. Minor Plaintiff J.M. utilized his in-game currency to gamble on the Illegal Gambling  
17 Websites.

18 170. Specifically, Minor Plaintiff J.M. has paid money to RBXFlip, BloxFlip and other  
19 Illegal Gambling Websites through Defendant Roblox.

20 171. Minor Plaintiff J.M. has lost thousands of Robux playing gambling games on RBXFlip,  
21 BloxFlip and other Illegal Gambling Websites.

22 172. At the time that Minor Plaintiff J.M. was wagering Robux on RBXFlip, BloxFlip and  
23 other Illegal Gambling Websites, Plaintiff Joshua R. Munson was not aware that his son was using  
24 Robux to engage in gambling activities.

25 **3. Minor Plaintiff T.T.**

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1 173. Plaintiff Joshua R. Munson is the parent and next friend of T.T. T.T. is a minor who  
2 plays Roblox using his own user-created account. Minor Plaintiff O.R. is a resident of Georgia and is  
3 represented in this action by his father and next friend, Plaintiff Joshua R. Munson.

4 174. Minor Plaintiff T.T. has purchased thousands of Robux through the use of his parents'  
5 credit card linked to his Roblox account.

6 175. Minor Plaintiff T.T. utilized his in-game currency to gamble on the Illegal Gambling  
7 Websites.

8 176. Specifically, Minor Plaintiff T.T. has paid money to RBXFlip, BloxFlip and other  
9 Illegal Gambling Websites through Defendant Roblox.

10 177. Minor Plaintiff T.T. has lost thousands of Robux playing gambling games on RBXFlip,  
11 BloxFlip and other Illegal Gambling Websites.

12 178. At the time that Minor Plaintiff T.T. was wagering Robux on RBXFlip, BloxFlip and  
13 other Illegal Gambling Websites, Plaintiff Joshua R. Munson was not aware that his son was using  
14 Robux to engage in gambling activities.

15 **4. Minor Plaintiff R.T.**

16 179. Plaintiff Joshua R. Munson is the parent and next friend of R.T. R.T. is a minor who  
17 plays Roblox using his own user-created account. Minor Plaintiff O.R. is a resident of Georgia and is  
18 represented in this action by his father and next friend, Plaintiff Joshua R. Munson.

19 180. Minor Plaintiff R.T. has purchased thousands of Robux through the use of his parents'  
20 credit card linked to his Roblox account.

21 181. Minor Plaintiff R.T. utilized his in-game currency to gamble on the Illegal Gambling  
22 Websites.

23 182. Specifically, Minor Plaintiff R.T. has paid money to RBXFlip, BloxFlip and other  
24 Illegal Gambling Websites through Defendant Roblox.

25 183. Minor Plaintiff R.T. has lost thousands of Robux playing gambling games on RBXFlip,  
26 BloxFlip and other Illegal Gambling Websites.

1 184. At the time that Minor Plaintiff R.T. was wagering Robux on RBXFlip, BloxFlip and  
2 other Illegal Gambling Websites, Plaintiff Joshua R. Munson was not aware that his son was using  
3 Robux to engage in gambling activities.

4 ***D. Lavina Gann***

5 185. Plaintiff Lavina Gann is the parent and next friend of S.J. S.J. is a minor who plays  
6 Roblox using his own user-created account. Minor Plaintiff S.J. is a resident of Tennessee and is  
7 represented in this action by his mother and next friend, Plaintiff Lavina Gann.

8 186. Minor Plaintiff S.J. has purchased thousands of Robux through the use of his parents'  
9 credit card linked to his Roblox account and gift cards that were under his complete ownership and  
10 control. Minor Plaintiff S.J. also received free promotional codes which would provide him with  
11 Robux that could be used on the Illegal Gambling Websites.

12 187. Minor Plaintiff S.J. utilized his in-game currency to gamble on the Illegal Gambling  
13 Websites.

14 188. Specifically, Minor Plaintiff S.J. has paid money to RBLXWild, BloxFlip and other  
15 Illegal Gambling Websites through Defendant Roblox.

16 189. Minor Plaintiff S.J. has lost thousands of Robux playing gambling games on  
17 RBLXWild, BloxFlip and other Illegal Gambling Websites.

18 190. At the time that Minor Plaintiff S.J. was wagering Robux on RBLXWild, BloxFlip and  
19 other Illegal Gambling Websites, Plaintiff Lavina Gann was not aware that her son was using Robux  
20 to engage in gambling activities.

21 **CLASS ALLEGATIONS**

22 191. Plaintiffs bring this action individually and on behalf of all others similarly situated.  
23 The proposed classes are defined as:

24 **Nationwide Class:**

25 All adult persons in the United States who, during the applicable  
26 limitations period, are or were the parent and/or legal guardian of a  
27 minor who acquired Robux through the Roblox platform and  
28 subsequently wagered and lost some or all of those Robux on any of the  
Illegal Gambling Websites.

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**South Carolina Class:**

All adult persons residing in the State of South Carolina who, during the applicable limitations period, are or were the parent and/or legal guardian of a minor who acquired Robux through the Roblox platform and subsequently wagered and lost some or all of those Robux on any of the Illegal Gambling Websites.

**Florida Class:**

All adult persons residing in the State of Florida who, during the applicable limitations period, are or were the parent and/or legal guardian of a minor who acquired Robux through the Roblox platform and subsequently wagered and lost some or all of those Robux on any of the Illegal Gambling Websites.

**Georgia Class:**

All adult persons residing in the State of Georgia who, during the applicable limitations period, are or were the parent and/or legal guardian of a minor who acquired Robux through the Roblox platform and subsequently wagered and lost some or all of those Robux on any of the Illegal Gambling Websites.

**Tennessee Class:**

All adult persons residing in the State of Tennessee who, during the applicable limitations period, are or were the parent and/or legal guardian of a minor who acquired Robux through the Roblox platform and subsequently wagered and lost some or all of those Robux on any of the Illegal Gambling Websites.

192. The Nationwide Class, South Carolina Class, Florida Class, Georgia Class and Tennessee Class are collectively referred to herein as the “Classes.”

193. Excluded from the Classes are Defendants, their subsidiaries and affiliates, officers, directors, the members of their immediate families, and any entity in which any Defendant has a controlling interest, to include the legal representatives, heirs, successors, or assigns of any such excluded party. Also excluded are the judicial officer(s) to whom this action is assigned, and the members of their immediate families.

194. Plaintiffs reserve the right to modify or amend the definition of the proposed Classes if necessary, before this Court determines whether certification is appropriate.

195. This case is properly brought as a class action under Fed. R. Civ. P. 23(b)(2) and (b)(3) and all requirements are met for the reasons set forth in the following paragraphs.

1           196. Numerosity. The members of the Classes are so numerous that separate joinder of  
2 each member is impracticable. Upon information and belief, and subject to discovery, the Classes  
3 consist of many thousands of members, the identity of whom are within the exclusive knowledge of  
4 Defendants and can be ascertained only by resorting to Defendants' records, discovery, and other third-  
5 party sources.

6           197. Commonality. There are numerous questions of law and fact common to the Classes  
7 relating to Defendants' business practices challenged herein, and those common questions  
8 predominate over any questions affecting only individual Class members. The common questions  
9 include, but are not limited to:

- 10           • Whether the Defendants formed an Enterprise engaged in illegal gambling activity  
11           in violation of the federal RICO statute;
- 12           • Whether each Defendant and/or the Enterprise engaged in a pattern of racketeering  
13           activity in violation of 18 U.S.C. § 1962;
- 14           • Whether one or more Defendants engaged in unlawful or unfair conduct prohibited  
15           by the State Consumer Fraud Statutes;
- 16           • Whether Defendants, individually or collectively, violated 18 U.S.C. § 1955 by  
17           operating the gambling businesses described herein;
- 18           • Whether Defendant Roblox accepted payments in connection with unlawful  
19           internet gambling in violation of 31 U.S.C. § 5633;
- 20           • Whether Defendants unjustly enriched themselves to the detriment of Plaintiffs and  
21           members of the Class;
- 22           • Whether Defendants' collective conduct constitutes a civil conspiracy to violate  
23           state consumer protection statutes and/or commit negligence per se;
- 24           • The proper measure of damages; and
- 25           • The declaratory and injunctive relief to which the Class is entitled.

26           198. Typicality. Plaintiffs' claims are typical of the claims of the other Class members in that  
27 they arise out of the same wrongful business practices engaged in by Defendants, as described herein.  
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1           199. Adequacy of Representation. Plaintiffs are adequate representatives of the Classes  
2 because Plaintiffs, both individually and on behalf of their minor children, have sustained damage as  
3 a result of Defendants’ uniform conduct. In addition:

- 4           • Plaintiffs are committed to the vigorous prosecution of this action individually and  
5           on behalf of and all others similarly situated and have retained competent counsel  
6           experienced in the prosecution of class actions and, in particular, class actions on  
7           behalf of consumers against financial institutions;
- 8           • There is no hostility of interest between Plaintiffs and the unnamed Class members;
- 9           • Plaintiffs anticipate no difficulty in the management of this litigation as a class  
10          action; and
- 11          • Plaintiffs’ legal counsel has the financial and legal resources to meet the substantial  
12          costs and legal work associated with this type of litigation.

13           200. *Predominance*. The questions of law and fact common to the Classes as set forth in the  
14 “commonality” allegation above predominate over any individual issues. As such, the  
15 “commonality” allegations are restated and incorporated herein by reference.

16           201. *Superiority*. A class action is superior to other available methods and highly desirable  
17 for the fair and efficient adjudication of this controversy. Since the amount of each individual Class  
18 member’s claim is very small relative to the complexity of the litigation and since the financial  
19 resources of Defendants are significant, no Class member could afford to seek legal redress  
20 individually for the claims alleged herein. Therefore, absent a class action, the Class members will  
21 continue to suffer losses and Defendants’ misconduct will proceed without remedy. In addition, even  
22 if Class members themselves could afford such individual litigation, the court system could not. Given  
23 the complex legal and factual issues involved, individualized litigation would significantly increase  
24 the delay and expense to all parties and to the Court. Individualized litigation would also create the  
25 potential for inconsistent or contradictory rulings. By contrast, a class action presents far fewer  
26 management difficulties, allows claims to be heard which might otherwise go unheard because of the  
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1 relative expense of bringing individual lawsuits, and provides the benefits of adjudication, economies  
2 of scale and comprehensive supervision by a single court.

3 202. All conditions precedent to bringing this action have been satisfied and/or waived.

4 **CAUSES OF ACTION**

5 **COUNT I**

6 **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS**

7 **ACT (“RICO”), 18 U.S.C. § 1961 *et seq.***

8 203. Plaintiffs hereby incorporate by reference the allegations contained in the preceding  
9 paragraphs of this Complaint.

10 204. This Claim is brought on behalf of the Nationwide Class for actual and treble  
11 damages and equitable relief under 18 U.S.C. § 1964. Members of the Nationwide Class are referred  
12 to herein collectively as “Class Members.”

13 205. Plaintiffs, Class Members, Roblox, and each of the Illegal Gambling Website  
14 Defendants are “persons” within the meaning of 18 U.S.C. § 1961(3).

15 206. As described herein, Plaintiffs allege that Defendants, individually and/or collectively,  
16 violated 18 U.S.C. § 1962(c) and 18 U.S.C. § 1962(d).

17 ***A. The Roblox RICO Enterprise***

18 207. Since at least 2019, Roblox, along with an enterprise of associated-in-fact entities  
19 that controlled the Illegal Gambling Websites (the “Enterprise”), operated an unlawful online  
20 gambling ring that preyed on children, adolescents, and teenagers. The Enterprise targeted Roblox’s  
21 prime users—those under the age of eighteen—and encouraged them to wager Robux on virtual games  
22 of chance, depriving these users of millions of Robux. As set forth herein, Robux have cash value and,  
23 after the Enterprise acquired the sought-after digital currency from its victims, it converted Robux to  
24 cash. The exchange of Robux for gambling credits occurred entirely on Roblox’s platform, with  
25 Roblox’s knowledge and active engagement.

26 208. Roblox was associated with the illegal Enterprise and conducted and participated in the  
27 Enterprise’s affairs through a pattern of racketeering activity including gambling, illegal  
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1 gambling businesses, and laundering of monetary instruments, all in violation of 18 U.S.C. § 1962.

2 209. The RICO Enterprise that engaged in, and whose activities affected, interstate  
3 commerce, is an association-in-fact enterprise within the meaning of 18 U.S.C. § 1961(4) and  
4 consists of “persons” associated together for the common purpose of employing the multiple  
5 deceptive, abusive, and fraudulent acts described herein.

6 210. At all times, the Enterprise consisted of at least Roblox and the owners and operators  
7 of the Illegal Gambling Websites—Satuzoki, Studs, and RBLXWild. Each of these entities was at all  
8 times aware that they were engaged in illegal gambling operations that relied on and was facilitated  
9 by Roblox’s digital currency, Robux. Further, each of these entities knew that the primary users of  
10 Roblox—children, adolescents, and teenagers under the age of eighteen—were wagering Robux on  
11 the Illegal Gambling Websites.

12 211. The RICO Enterprise is an ongoing organization with an ascertainable structure and a  
13 framework for making and carrying out decisions, that functions as a continuing unit with  
14 established duties, and that is separate and distinct from the pattern of racketeering activity in which  
15 Enterprise members have engaged and are engaging. The Enterprise was and is used by Roblox as a  
16 tool to effectuate the pattern of racketeering activity.

17 212. Roblox, Satozuki, Studs, and RBLXWild were and are entities separate and distinct  
18 from each other and from the Enterprise. All of the Enterprise constituents are independent legal  
19 entities with the authority and responsibility to act independently of the Enterprise and of the other  
20 Enterprise members.

21 213. The members of the Enterprise all had a common purpose: to facilitate and promote an  
22 illegal gambling operation that preyed upon minor victims and thereby enrich themselves.

23 214. Each member of the Enterprise benefited from the common purpose: the Illegal  
24 Gambling Websites acquired Robux wagered by minor users and thereafter converted those Robux to  
25 cash. Roblox took a 30% fee each time the Illegal Gambling Websites made such a transfer.

26 ***B. Pattern of Racketeering Activity***

27 215. As set forth herein, Roblox conducted and participated in the affairs of the  
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1 Enterprise through a pattern of racketeering activity that lasted several years, beginning in at least  
2 2019 and continuing to the present day. This pattern consisted of continuous acts involving  
3 conducting, financing, managing, supervising, directing, or owning all or part of an illegal gambling  
4 business, in violation of 18 U.S.C. § 1955.

5 216. Since at least 2019, Roblox and the Gambling Website Defendants have engaged in  
6 numerous, continuous predicate acts that constitute racketeering activity, including its known  
7 facilitation of illegal gambling websites that cater to, and prey upon, Roblox's minor users.

8 217. During the class period, Roblox has facilitated numerous exchanges of Robux for  
9 gambling credits on its platform and thereafter permitted the Gambling Website Defendants to cash  
10 those illegally-acquired Robux out in exchange for real-world currency, all while Roblox takes a 30%  
11 fee from each transaction.

12 218. During the entirety of this period, and as set forth herein, Roblox knowingly  
13 facilitated this racketeering activity; indeed, every exchange of Robux took place entirely on  
14 Roblox's platform, using Roblox's technology, with Roblox's knowledge, and resulted in Roblox's  
15 enrichment.

16 219. Furthermore, Roblox required each of the Gambling Website Defendants to register in  
17 its Developer Exchange program, or to register a proxy or agent in the program, so that the Gambling  
18 Website Defendants could exchange ill-gotten Robux for real-world currency. Because they were  
19 registered in its Developer Exchange, Roblox knew and understood that the Gambling Website  
20 Defendants and their agents were not selling goods to minors in exchange for Robux, but were instead  
21 using the Roblox platform to exchange Robux for gambling credits. Roblox has in the past identified  
22 such exchanges and characterized them as laundering fronts, demonstrating that it knows full well  
23 when such sham exchanges are occurring.

24 ***C. Plaintiffs' Injuries***

25 220. Plaintiffs and members of the Classes were injured and lost money or property,  
26 including but not limited to money paid for Roblox's in-game currency, Robux, as a result of the  
27 illegal practices of the RICO Enterprise.



1           226. Defendants, individually and collectively, violate section 330a because they operate  
2 illegal gambling websites upon which minors are able to, and do, gamble Robux, which have real-  
3 world cash value, in virtual games of chance.

4           227. California Penal Code § 330b states that “[i]t is unlawful for any persons to  
5 manufacture, repair, own, store, possess, sell, rent, lease, let on shares, lend or give away, transport, or  
6 expose for sale or lease, or to offer to repair, sell, rent, lease, let on shares, lend or give away, or permit  
7 the operation, placement, maintenance, or keeping of, in any place, room, space, or building owned,  
8 leased, or occupied, managed, or controlled by that person, any slot machine or device, as defined in  
9 this section.”

10           228. Defendants, individually and collectively, violate section 330b because they operate  
11 illegal gambling websites upon which minors are able to, and do, gamble Robux, which have real-  
12 world cash value, in virtual games of chance, including virtual slot machines and other gambling  
13 devices defined as illegal under this section.

14           229. California Penal Code § 330.1(a) states that “[e]very person who manufactures, owns,  
15 stores, keeps, possesses, sells, rents, leases, lets on shares, lends or gives away, transports, or exposes  
16 for sale or lease, or offers to sell, rent, lease, let on shares, lend or give away or who permits the  
17 operation of or permits to be placed, maintained, used, or kept in any room, space, or building owned,  
18 leased, or occupied by him or her or under his or her management or control, any slot machine or  
19 device as hereinafter defined, and every person who makes or permits to be made with any person any  
20 agreement with reference to any slot machine or device as hereinafter defined, pursuant to which  
21 agreement the user thereof, as a result of any element of hazard or chance, may become entitled to  
22 receive anything of value or additional chance or right to use that slot machine or device, or to receive  
23 any check, slug, token, or memorandum, whether of value or otherwise, entitling the holder to receive  
24 anything of value, is guilty of a misdemeanor.”

25           230. Defendants, individually and collectively, violate section 330.1 because they operate  
26 illegal gambling websites upon which minors are able to, and do, gamble Robux, which have real-  
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1 world cash value, in virtual games of chance, including virtual slot machines and other gambling  
2 games defined as illegal under this section.

3 231. Under California Penal Code § 337j(a)(1), by “operat[ing], carry[ing] on,  
4 conduct[ing], maintain[ing], or expos[ing] for play” unlicensed gambling in the state, Defendants,  
5 individually and collectively, violate section 337j(a)(1).

6 232. Under California Penal Code § 337j(a)(2), by “receiv[ing], directly or indirectly, any  
7 compensation or reward or any percentage or share of the revenue, for keeping, running, or carrying  
8 on any controlled game,” Defendants, individually and collectively, violate section 337j(a)(2).

9 233. The Illegal Gambling Business Act of 1970 (18 U.S.C. § 1955) (the “**IGBA**”): The  
10 IGBA makes it a crime to “conduct, finance, manage, supervise, direct, or own all or part” of an illegal  
11 gambling business.

12 234. Defendants, both individually and collectively, violate the IGBA because their  
13 respective businesses involve five or more persons, have been in continuous operation for more than  
14 thirty days, and violate California’s gambling laws as alleged herein.

15 235. The Unlawful Internet Gambling Enforcement Act of 2006 (31 U.S.C. §§ **5361-5367**)  
16 (the “**UIGEA**”): The UIGEA makes it illegal for a “person engaged in the business of betting or  
17 wagering” to knowingly accept payments “in connection with the participation of another person in  
18 unlawful Internet gambling.” 31 U.S.C. § 5633. “Unlawful Internet Gambling” is placing, receiving,  
19 or transmitting a bet or wager through, at least in part, the Internet where such bet or wager “is unlawful  
20 under any applicable Federal or State law in the State or Tribal lands in which the bet or wager is  
21 initiated, received, or otherwise made.” 15 U.S.C. § 5362(10)(a).

22 236. Defendants, individually and collectively, violate the UIGEA because they operate the  
23 illegal gambling websites upon which minors are able to, and do, gamble Robux, which have real-  
24 world cash value, in virtual games of chance.

25 237. As alleged below, Defendants’ conduct, individually and collectively, violates section  
26 1770(a)(14) of the Consumers Legal Remedies Act (“CLRA”). Therefore, Defendants have also  
27 violated the UCL’s “unlawful” provision.  
28



1           244. As a result of Defendants’ conduct, Plaintiffs and Class members purchased Roblox’s  
2 goods and/or services for use by their minor children, and Defendant Roblox then facilitated those  
3 children to exchange Robux for gambling credits on the Roblox ecosystem and ultimately to  
4 participate in illegal gambling on the Illegal Gambling Websites.

5           245. By engaging in the conduct described herein, Defendants, individually and collectively,  
6 have violated subdivision (a)(14) of California Code § 1770 by “Representing that a transaction  
7 confers or involves rights, remedies, or obligations that it does not have or involve, or that are  
8 prohibited by law.” Under this provision, omissions are actionable.

9           246. Defendants, individually and collectively, violated the CLRA by representing to  
10 Plaintiffs and their minor children that none of the developers that operate in the Roblox ecosystem  
11 host games that constitute illegal gambling and that Robux could not be used to engage in illegal  
12 gambling when, in fact, Defendants set up and collectively facilitated an illegal gambling enterprise  
13 in which adolescents and teenagers exchange Robux in the Roblox ecosystem for gambling credits for  
14 the express purpose of gambling. Moreover, Defendant Roblox publicly claimed, both in its terms of  
15 service and in public representations, that it actively monitored its platform to prohibit its minor users  
16 from engaging in illegal gambling when, in fact, it knowingly facilitated such illegal activities.  
17 Defendants further violated the CLRA by failing to disclose to Plaintiffs and their children that Roblox  
18 supported and facilitated an illegal gambling enterprise that minors could engage in using Robux.

19           247. Defendants’ violations of the CLRA proximately caused injury in fact to Plaintiffs, their  
20 minor children, and the Class.

21           248. Defendants’ unlawful conduct occurred in and emanated from California.

22           249. Defendants’ conduct, individually and collectively, is wanton and malicious.

23           250. Pursuant to Cal. Civ. Code § 1782(d), Plaintiffs, individually and on behalf of the Class,  
24 seek a Court order enjoining the above-described wrongful acts and practices of Defendants and for  
25 restitution and disgorgement.<sup>33</sup>

26 \_\_\_\_\_  
27 <sup>33</sup> Pursuant to Cal. Civ. Code § 1782(a), Plaintiffs intend to serve notice on Defendants at least 30  
28 days prior to amending this complaint to seek actual, punitive, and statutory damages, as appropriate  
under the CLRA.



1           258. Defendant Roblox knew or should have known that its minor users could and were  
2 likely to engage in illegal gambling using the Roblox platform, and therefore Roblox’s representations  
3 that such activities were prohibited were misleading and/or false.

4           259. Defendant Roblox did not disclose to Plaintiffs or the Class members that Roblox users,  
5 including minors, could use Robux to engage in illegal gambling on the Illegal Gambling Websites,  
6 and that Roblox facilitated such gambling by supporting the exchange of Robux for gambling credits  
7 on its platform.

8           260. Defendant Roblox also did not disclose to Plaintiff or the Class members that it knew  
9 that the Gambling Website Defendants were operating the Illegal Gambling Websites, or that Roblox  
10 was facilitating the operation of these websites and profiting from their operation.

11           261. Defendant Roblox’s misrepresentations and omissions were material because they were  
12 likely to deceive reasonable consumers, including both parents and Roblox’s minor users, about  
13 whether Roblox facilitated illegal gambling using Robux.

14           262. Such acts by Defendant Roblox are and were deceptive acts or practices that were likely  
15 to mislead a reasonable consumer, including Roblox’s minor consumers, using the Roblox platform in  
16 a reasonable manner.

17           263. As a direct and proximate result of the deceptive practices alleged herein, Plaintiff and  
18 members of the Class have suffered (and will continue to suffer) the predatory harms inflicted by  
19 Defendants’ illegal gambling scheme. Plaintiffs have lost Robux, with monetary value, as a result of  
20 Defendants’ deceptive conduct.

21           264. Further, although Defendant Roblox has engaged in material misrepresentations and  
22 omissions, as set forth herein, it has also participated in a civil conspiracy to violate state law along  
23 with the Gambling Website Defendants. To accomplish their objectives, Defendants agreed to create  
24 an illegal gambling environment that would cater to Roblox’s minor users. The Gambling Website  
25 Defendants created gambling websites that would accept Robux in exchange for gambling credits,  
26 Roblox would facilitate the exchange of Robux for gambling credits on the Roblox platform, and  
27 Roblox would charge a 30% fee when the Gambling Website Defendants cashed out the Robux  
28



1 obtained from minor users. Each participant in this conspiracy understood that Roblox was deceiving  
2 its minor users and their parents or guardians when it claimed that Robux could not be used on its  
3 platform to engage in illegal gambling when, in fact, Roblox was working with the Gambling Website  
4 Defendants to achieve exactly this purpose.

5 265. Defendants’ conduct was committed willfully and knowingly.

6 266. Plaintiffs and members of the Class lost Robux as a result of the violations described  
7 herein, and these Robux have real-world monetary value.

8 267. Defendants’ unlawful conduct constitutes a violation of the FDUTPA. Fla. Stat. §  
9 501.201, *et seq.*

10 268. Plaintiff seek all monetary and non-monetary relief allowed by law, including damages,  
11 injunctive relief, and attorneys’ fees and costs, as well as all damages permitted as a result of  
12 Defendants’ civil conspiracy, including damages inflicted due to unlawful acts taken in furtherance of  
13 the conspiracy.

14 **COUNT V**

15 **VIOLATION OF THE SOUTH CAROLINA UNFAIR TRADE PRACTICES ACT**  
16 **(“SCUTPA”)**

17 **S.C. Code Laws § 39-5-10, *et seq.***

18 269. Plaintiffs hereby incorporate by reference the allegations contained in the preceding  
19 paragraphs of this Complaint.

20 270. The SCUTPA prohibits “[u]nfair methods of competition and unfair or deceptive acts  
21 or practices in the conduct of any trade or commerce.” S.C. Code Laws § 39-5-20.

22 271. Defendant Roblox transmitted false and misleading information to Class members. In  
23 particular, Roblox represented to Plaintiffs and Class members that gambling was not permitted on its  
24 platform, yet facilitated the illegal gambling enterprise through the exchange of Robux that occurred  
25 entirely within Roblox’s platform, with Roblox’s knowledge and support.

26 272. The alleged misrepresentations and omissions made by Defendants were received by  
27 Plaintiffs and Class members where they resided.

1           273. Defendant Roblox expressly represented that it did not permit gambling to occur on its  
2 platform, that Robux cannot be used for gambling purposes, and that it monitored third parties to  
3 ensure that its platform was not used to facilitate illegal gambling using Robux. None of these  
4 representations are true or accurate, as set forth above.

5           274. Defendant Roblox further omitted material information from its users, including its  
6 minor users, failing to inform them that it was facilitating an illegal gambling enterprise along with  
7 the Gambling Website Defendants. Roblox also failed to inform its users that they could, in fact, use  
8 their Robux to engage in gambling activities, which were facilitated through the Roblox platform.

9           275. Defendant Roblox knew or should have known that its minor users could and were  
10 likely to engage in illegal gambling using the Roblox platform, and therefore Roblox's representations  
11 that such activities were prohibited were misleading and/or false.

12           276. Defendant Roblox did not disclose to Plaintiffs or the Class members that Roblox users,  
13 including minors, could use Robux to engage in illegal gambling on the Illegal Gambling Websites,  
14 and that Roblox facilitated such gambling by supporting the exchange of Robux for gambling credits  
15 on its platform.

16           277. Defendant Roblox also did not disclose to Plaintiff or the Class members that it knew  
17 that the Gambling Website Defendants were operating the Illegal Gambling Websites, or that Roblox  
18 was facilitating the operation of these websites and profiting from their operation.

19           278. Defendant Roblox's misrepresentations and omissions were material because they were  
20 likely to deceive reasonable consumers, including both parents and Roblox's minor users, about  
21 whether Roblox facilitated illegal gambling using Robux.

22           279. Such acts by Defendant Roblox are and were deceptive acts or practices that were likely  
23 to mislead a reasonable consumer, including Roblox's minor consumers, using the Roblox platform in  
24 a reasonable manner.

25           280. As a direct and proximate result of the deceptive practices alleged herein, Plaintiff and  
26 members of the Class have suffered (and will continue to suffer) the predatory harms inflicted by  
27  
28

1 Defendants' illegal gambling scheme. Plaintiffs have lost Robux, with monetary value, as a result of  
2 Defendants' deceptive conduct.

3 281. Further, although Defendant Roblox has engaged in material misrepresentations and  
4 omissions, as set forth herein, it has also participated in a civil conspiracy to violate state law along  
5 with the Gambling Website Defendants. To accomplish their objectives, Defendants agreed to create  
6 an illegal gambling environment that would cater to Roblox's minor users. The Gambling Website  
7 Defendants created gambling websites that would accept Robux in exchange for gambling credits,  
8 Roblox would facilitate the exchange of Robux for gambling credits on the Roblox platform, and  
9 Roblox would charge a 30% fee when the Gambling Website Defendants cashed out the Robux  
10 obtained from minor users. Each participant in this conspiracy understood that Roblox was deceiving  
11 its minor users and their parents or guardians when it claimed that Robux could not be used on its  
12 platform to engage in illegal gambling when, in fact, Roblox was working with the Gambling Website  
13 Defendants to achieve exactly this purpose.

14 282. Defendants' conduct was committed willfully and knowingly.

15 283. Plaintiffs and members of the Class lost Robux as a result of the violations described  
16 herein, and these Robux have real-world monetary value.

17 284. Defendants' unlawful conduct constitutes a violation of the SCUTPA. S.C. Code Laws  
18 § 39-5-10, *et seq.*

19 285. Plaintiff seek all monetary and non-monetary relief allowed by law, including damages,  
20 injunctive relief, and attorneys' fees and costs, as well as all damages permitted as a result of  
21 Defendants' civil conspiracy, including damages inflicted due to unlawful acts taken in furtherance of  
22 the conspiracy.

23 **COUNT VI**

24 **VIOLATION OF THE TENNESSEE CONSUMER PROTECTION ACT ("TCPA")**

25 **Tenn. Code § 47-18-101, *et seq.***

26 286. Plaintiffs hereby incorporate by reference the allegations contained in the preceding  
27 paragraphs of this Complaint.

1           287. The TCPA prohibits “[u]nfair or deceptive acts or practices affecting the conduct of any  
2 trade or commerce.” Tenn. Code § 47-18-104.

3           288. Defendant Roblox transmitted false and misleading information to Class members. In  
4 particular, Roblox represented to Plaintiffs and Class members that gambling was not permitted on its  
5 platform, yet facilitated the illegal gambling enterprise through the exchange of Robux that occurred  
6 entirely within Roblox’s platform, with Roblox’s knowledge and support.

7           289. The alleged misrepresentations and omissions made by Defendants were received by  
8 Plaintiffs and Class members where they resided.

9           290. Defendant Roblox expressly represented that it did not permit gambling to occur on its  
10 platform, that Robux cannot be used for gambling purposes, and that it monitored third parties to  
11 ensure that its platform was not used to facilitate illegal gambling using Robux. None of these  
12 representations are true or accurate, as set forth above.

13           291. Defendant Roblox further omitted material information from its users, including its  
14 minor users, failing to inform them that it was facilitating an illegal gambling enterprise along with  
15 the Gambling Website Defendants. Roblox also failed to inform its users that they could, in fact, use  
16 their Robux to engage in gambling activities, which were facilitated through the Roblox platform.

17           292. Defendant Roblox knew or should have known that its minor users could and were  
18 likely to engage in illegal gambling using the Roblox platform, and therefore Roblox’s representations  
19 that such activities were prohibited were misleading and/or false.

20           293. Defendant Roblox did not disclose to Plaintiffs or the Class members that Roblox users,  
21 including minors, could use Robux to engage in illegal gambling on the Illegal Gambling Websites,  
22 and that Roblox facilitated such gambling by supporting the exchange of Robux for gambling credits  
23 on its platform.

24           294. Defendant Roblox also did not disclose to Plaintiff or the Class members that it knew  
25 that the Gambling Website Defendants were operating the Illegal Gambling Websites, or that Roblox  
26 was facilitating the operation of these websites and profiting from their operation.

1           295. Defendant Roblox’s misrepresentations and omissions were material because they were  
2 likely to deceive reasonable consumers, including both parents and Roblox’s minor users, about  
3 whether Roblox facilitated illegal gambling using Robux.

4           296. Such acts by Defendant Roblox are and were deceptive acts or practices that were likely  
5 to mislead a reasonable consumer, including Roblox’s minor consumers, using the Roblox platform in  
6 a reasonable manner.

7           297. As a direct and proximate result of the deceptive practices alleged herein, Plaintiff and  
8 members of the Class have suffered (and will continue to suffer) the predatory harms inflicted by  
9 Defendants’ illegal gambling scheme. Plaintiffs have lost Robux, with monetary value, as a result of  
10 Defendants’ deceptive conduct.

11           298. Further, although Defendant Roblox has engaged in material misrepresentations and  
12 omissions, as set forth herein, it has also participated in a civil conspiracy to violate state law along  
13 with the Gambling Website Defendants. To accomplish their objectives, Defendants agreed to create  
14 an illegal gambling environment that would cater to Roblox’s minor users. The Gambling Website  
15 Defendants created gambling websites that would accept Robux in exchange for gambling credits,  
16 Roblox would facilitate the exchange of Robux for gambling credits on the Roblox platform, and  
17 Roblox would charge a 30% fee when the Gambling Website Defendants cashed out the Robux  
18 obtained from minor users. Each participant in this conspiracy understood that Roblox was deceiving  
19 its minor users and their parents or guardians when it claimed that Robux could not be used on its  
20 platform to engage in illegal gambling when, in fact, Roblox was working with the Gambling Website  
21 Defendants to achieve exactly this purpose.

22           299. Defendants’ conduct was committed willfully and knowingly.

23           300. Plaintiffs and members of the Class lost Robux as a result of the violations described  
24 herein, and these Robux have real-world monetary value.

25           301. Defendants’ unlawful conduct constitutes a violation of the TCPA. Tenn. Code § 47-  
26 18-101, *et seq.*













1 Dated: March 14, 2024

Respectfully submitted,

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