

UNITED STATES DISTRICT COURT

JARED VALDEZ, Plaintiff

vs.

ROBLOX CORPORATION, Defendant

Case No.: 8223473894

COMPLAINT FOR DAMAGES

I. INTRODUCTION

1. This is a civil action brought by Jared Valdez ("Plaintiff") against Roblox Corporation ("Defendant"), seeking damages for defamation, breach of contract, and violation of ethical game design principles. Plaintiff alleges that Defendant, through its actions, defamed his character, unjustly banned his accounts, and failed to uphold its duty to maintain ethical and fair game design standards, resulting in reputational harm and financial loss.

II. PARTIES

2. Plaintiff, Jared Valdez, is an individual residing in REDACTED. Plaintiff was a prominent game designer and content creator on the Roblox platform, with accounts valued at over \$7,000,000 of virtual items and currency (ROBUX), (TICKETS), USD before they were wrongfully banned.
3. Defendant, Roblox Corporation, is a corporation duly organized under the laws of California with its principal place of business located in San Francisco, CA. Roblox is a popular online platform that allows users to create and play games within its virtual ecosystem.

III. JURISDICTION AND VENUE

4. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a) as the amount in controversy exceeds \$75,000, and there is diversity of citizenship between the parties.
5. Venue is proper in this Court under 28 U.S.C. § 1391(b) as Defendant conducts substantial business in this district, and the events giving rise to this claim occurred within this jurisdiction.

IV. FACTUAL BACKGROUND

6. Plaintiff was a well-known game designer on the Roblox platform, with multiple successful games and an extensive virtual portfolio valued at over \$7,000,000 USD.
7. In or around 2010-2016, Plaintiff's Roblox accounts were permanently banned without sufficient explanation or due process. Defendant's ban deprived Plaintiff of his virtual assets, income generated through the sale of virtual items, and the ability to continue his game development career on the platform.
8. Plaintiff contends that his ban was a result of defamation, as Roblox allowed false accusations and public criticism to circulate among millions of users, branding him as a malicious player responsible for exploiting platform loopholes. These accusations damaged Plaintiff's reputation and led to the wrongful termination of his accounts.
9. Roblox Corporation, in failing to enforce ethical game design standards, permitted flaws in its platform's economy and moderation system to harm the Plaintiff. These flaws allowed for the dissemination of false claims and failed to protect Plaintiff's rights as a user, leading to his accounts being banned unjustly.

V. CAUSES OF ACTION

COUNT 1: DEFAMATION

10. Plaintiff re-alleges and incorporates by reference the allegations set forth above.
11. Defendant allowed false and defamatory statements about Plaintiff's conduct to be disseminated on the platform, accusing him of exploiting the platform's economy systems and unethical behavior. These statements were untrue and caused Plaintiff significant harm to his reputation.
12. Defendant's failure to intervene and prevent the spread of these defamatory statements constituted reckless disregard for the truth, and these falsehoods were a direct cause of Plaintiff's account ban and damage to his character.

COUNT 2: BREACH OF CONTRACT

13. Plaintiff re-alleges and incorporates by reference the allegations set forth above.
14. Plaintiff entered into an agreement with Defendant when creating and utilizing accounts on the Roblox platform. This agreement included terms and conditions outlining the rights and responsibilities of both parties, including Plaintiff's right to utilize the platform under fair and just terms.
15. Defendant breached this agreement by wrongfully banning Plaintiff's accounts without sufficient evidence, explanation, or an opportunity for Plaintiff to defend his actions, thereby depriving Plaintiff of his virtual assets and income.

COUNT 3: VIOLATION OF ETHICAL GAME DESIGN PRINCIPLES

16. Plaintiff re-alleges and incorporates by reference the allegations set forth above.
17. Defendant has a duty to maintain ethical and fair game design standards, including upholding a platform that promotes fairness, inclusion, and community-building. Defendant failed to uphold these principles, instead allowing flaws in its economy and moderation systems to perpetuate harmful behavior toward Plaintiff and other users.
18. Defendant's failure to protect Plaintiff's rights as a creator on its platform, and its failure to enforce ethical standards, directly contributed to Plaintiff's financial losses and reputational harm.

VI. DAMAGES

19. As a direct result of Defendant's actions, Plaintiff has suffered substantial economic and non-economic damages, including but not limited to:

- a. Loss of virtual assets and income in excess of \$7,000,000 USD;
- b. Reputational damage resulting in loss of future opportunities on the Roblox platform and beyond;
- c. Emotional distress caused by public defamation and the unwarranted banning of Plaintiff's accounts;
- d. Legal fees and costs associated with bringing this lawsuit.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff and against Defendant as follows:

1. For compensatory damages in an amount to be proven at trial, but not less than \$7,000,000 USD;
2. For punitive damages for Defendant's willful and reckless conduct;
3. For injunctive relief, including the restoration of Plaintiff's banned accounts and assets;
4. For attorney's fees, costs, and other expenses incurred in this action;
5. For such other and further relief as the Court deems just and proper.

VIII. JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues so triable.

Dated: 09/20/2024

Respectfully submitted,
Robert & Robert LLC.