

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT  
IN AND FOR LEON COUNTY, FLORIDA

IN RE: STATEWIDE PROSECUTOR : OSP No.:2025-osp-0692  
CRIMINAL INVESTIGATION : Subpoena No.: 2025-0909  
:

---

SUBPOENA DUCES TECUM

\*\*\*Pursuant to § 92.605, Florida Statutes, a response is due within 60 business days of receipt of this subpoena unless a longer time period is stated herein.\*\*\*

YOU ARE COMMANDED TO SUMMON:

ROBLOX CORPORATION  
Legal Department  
3150 South Delaware Street  
San Mateo, CA 94403;

CORPORATION SERVICE COMPANY  
1201 Hays Street  
Tallahassee, FL 32301-2525;  
legal@roblox.com

SERVED VIA ROBLOX LAW ENFORCEMENT PORTAL, CERTIFIED MAIL, AND  
EMAIL

to appear before the undersigned Assistant Statewide Prosecutor on the 20<sup>th</sup> day of December, 2025 at 9:00 o'clock a.m. at the Office of Statewide Prosecution, Concourse Center 4, 3507 Frontage Road, Suite 350, Tampa, Florida 33607, to testify truthfully on behalf of the State of Florida, and to bring with him/her the following items:

SEE ATTACHED ADDENDUM

IN LIEU OF PERSONAL APPEARANCE, THESE ITEMS ALONG WITH A COMPLETED, NOTARIZED CERTIFICATION OF BUSINESS RECORD, MAY BE FURNISHED ON OR BEFORE THE ABOVE DATE BY MAIL, FAX, EMAIL TO THE UNDERSIGNED ASSISTANT STATEWIDE PROSECUTOR.

THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to: (1) appear as specified; or (2) furnish the records instead of appearing as provided above; or (3) object to this subpoena, you may be in contempt of court.

This SUBPOENA is issued under the authority of the Circuit Court, at the request of the Office of Statewide Prosecution, by and through the undersigned prosecuting attorney.

Statewide Prosecutor

By: \_\_\_\_\_

*Rita Pavan Peters*  
RITA PAVAN PETERS  
Special Counsel  
Assistant Statewide Prosecutor  
Florida Bar No: 158445  
Office of Statewide Prosecution  
3507 E. Frontage Road, Suite 350  
Tampa, Florida 33607-7013  
813-287-7960  
[Rita.Peters@myfloridalegal.com](mailto:Rita.Peters@myfloridalegal.com)

IN WITNESS WHEREOF, I have set my hand hereunto, and the seal of the Court at Tampa, Florida, this 20<sup>th</sup> of October 2025.

VICTOR CRIST, CLERK OF THE CIRCUIT COURT



BY: \_\_\_\_\_

*Kimberly Jean Joseph*  
Deputy Clerk to Victor Crist  
Clerk of the Circuit Court

Served this \_\_\_ day of \_\_\_\_\_ 2025 via personal service / facsimile transmission / email / U. S. Mail / U.S. Certified Mail.

By: \_\_\_\_\_

In accordance with the Americans with Disabilities Act of 1990, persons needing a special accommodation to participate in this proceeding should contact the Statewide Prosecutor's Office at (813) 287-7960 no later than seven days prior to the proceedings. If hearing impaired, contact the above individual via the Florida Relay Service at 1-800-955-8771 (TDD) or 1-800-955-8770 (voice).





**JAMES UTHMEIER  
ATTORNEY GENERAL  
STATE OF FLORIDA**

**OFFICE OF THE ATTORNEY GENERAL  
Office of Statewide Prosecution  
Tampa Bureau**

**Rita Pavan Peters  
Special Counsel and  
Assistant Statewide Prosecutor  
3507 E. Frontage Road, Suite 350  
Tampa, FL 33607-7013  
(813) 287-7960  
(813) 281-5520 (Fax)  
[Rita.Peters@myfloridalegal.com](mailto:Rita.Peters@myfloridalegal.com)**

---

**NOTICE TO THIRD-PARTY RECIPIENT OF  
STATEWIDE PROSECUTOR SUBPOENA**

As the recipient of a subpoena duces tecum, under Florida law (s. 92.153), you may be entitled to receive payment for directly incurred costs which are reasonably necessary to search for, reproduce, or transport records in order to comply with the subpoena.

This payment is limited to the total amount of personnel time spent locating and retrieving documents or information requested by the subpoena. The following rates are established:

Records:	<u>\$10.00</u> per hour search cost may not exceed <u>\$0.15</u> per page
Medical Records:	May not exceed <u>\$1.00</u> per page for making copies Up to <u>\$1.00</u> for each year of medical records requested

After the subpoena is served, you should keep an accurate record of personnel search time, and the number of reproductions made. Submit an itemized invoice to:

**RITA PAVAN PETERS  
Special Counsel  
Assistant Statewide Prosecutor  
Florida Bar No: 158445  
Office of Statewide Prosecution  
3507 E. Frontage Road, Suite 350  
Tampa, Florida 33607-7013  
813-287-7960  
[Rita.Peters@myfloridalegal.com](mailto:Rita.Peters@myfloridalegal.com)**

**RE: Subpoena Duces Tecum #  
2025-0909**

The invoice must contain the following information:

1. Case number and subpoena number.
2. Your Federal Employer Identification Number.

IF THE TOTAL COST OF SUPPLYING THESE RECORDS WILL EXCEED \$200.00,  
PLEASE CONTACT THE DESIGNATED PROSECUTOR BEFORE PROCEEDING.

See: ss.92.153, 395.3025(1), Fla. Stat.

## ADDENDUM

### Definitions

1. "Company" or "companies" as used herein means the addressee/recipients of this subpoena, Roblox Corporation, its parents, branches, departments, divisions, affiliates, subsidiaries, retail outlets, stores, franchises, successors, or predecessors, whether wholly owned or not, including, without limitation, any organization or entity in which said addressees have a management or controlling interest, together with all present and former officers, directors, agents, employees, sales people, brokers, representatives or anyone else acting or purporting to act, on behalf of the above-identified persons or entities, or through which Roblox Corporation may have conducted business. The terms "you" and "your" shall be synonymous with Roblox Corporation.
2. "Document" or "documents" as used herein shall include all paper records and all electronically stored information, including the original and any non-identical copy (whether different from the original because of notations on such copy or otherwise, and including all draft versions of the original), of any written, recorded, or graphic matter, however produced or reproduced, including, but not limited to, all correspondence, communications (as defined below in Paragraph 5), web pages, social media communications, marketing materials, photographs, contracts (including drafts, proposals, and any and all exhibits thereto), drafts, minutes and agendas, memoranda (including inter and intra-office memoranda, memoranda for file, pencil jottings, diary entries, desk calendar entries, reported recollections, and any other written form of notation of events or intentions), transcripts and recordings of conversations and telephone calls, audio and video media files, books of account, ledgers, publications, professional journals, invoices, financial statements, purchase orders, receipts, canceled checks and all other paper or electronic documentary material of any nature whatsoever, together with any attachments thereto or enclosures therewith.
3. The term "any" shall be construed as synonymous with "all" and shall be all inclusive.
4. The connectives "and" and "or" shall be construed either disjunctively or conjunctively, whichever makes the request more inclusive.
5. "Communication" or "communications" means any act, action, oral speech, written correspondence, contact, expression of words, thoughts, opinions, ideas, or transmission or exchange of data or other information to another person, whether orally, person to person, in a group, by telephone, letter, personal delivery, intercom, fax, e-mail, text message, social media, online messaging, or any other process, electric, electronic or otherwise in any medium. All such communications in writing shall include, without limitation, printed, typed, handwritten, or other readable documents.
6. "Abuse" has the same meaning as used in Chapter 39 and Chapter 827, Florida Statutes and means any willful act or threatened act that results in any physical, mental, or sexual injury or harm that causes or is likely to cause the child's physical, mental, or emotional health to be impaired.
7. The term "exploitation" means using, coercing, or manipulating or attempting to use,

coerce or manipulate a minor in the production of sexually explicit material or child sexual abuse material, distributing, possessing or transmitting child sexual abuse material, engaging in online “enticement” or grooming with sexual intent.

8. "Person" means any individual and all entities, and, without limiting the generality of the foregoing, includes natural persons, employees, contractors, agents, consultants, vendors, telemarketers, consumers, customers, officers, directors, successors, assigns, joint owners, associations, partnerships, companies, joint ventures, corporations, affiliates, trusts, trustees, escrow agents and estates, and all groups or associations of persons.
9. “Related to” or “relating to” means in whole or in part constituting, containing, concerning, embodying, reflecting, discussing, describing, analyzing, identifying, stating, referring to, setting forth, dealing with, or in any way pertaining to.
10. "Child" or "Children" means an individual younger than 18 years of age.
11. “Minor” means an individual younger than 18 years of age.
12. “Grooming” means pattern of communication or conduct directed to a minor that includes building trust or emotional connection with a minor, desensitizing the minor to sexual content or advances, isolating or manipulating a minor to prepare for abuse or exploitation, explicit and detailed verbal descriptions or narrative accounts of sexual activity, sexual conduct, or sexual excitement or is intended to seduce, solicit, lure or entice a child.
13. "Safety Issue" or "safety issues" includes events or communications relating to child exploitation, kidnapping, child predators, child endangerment, child pornography, addictive use, human trafficking, child sexual abuse material, material harmful to children, or illegal activity.
14. "Personal Information" means information that is linked or reasonably linkable to an identified or identifiable child, including biometric information and unique identifiers to the child.
15. "Process" or "Processing" means any operation or set of operations performed on personal information or on sets of personal information, regardless of whether by automated means.
16. "User" or "Users" means any individual or entity utilizing or accessing the services provided by Your platform.
17. "Daily Active Users" means the number of unique users in the United States who used the online forum, website, or application at least 80 percent of the days during the previous 12 months.



### Instructions

- A. This Subpoena is for the production of all responsive documents and information in your possession, custody or control regardless of whether such documents or information is possessed directly by you or your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your attorneys or their agents, employees, representatives, or investigators.
- B. Unless otherwise specified, original documents must be produced, and the originals of electronic files must be produced in accordance with paragraph P herein. If your "original" is a photocopy, then the photocopy would be and should be produced as the original. Said copy shall be legible and bound or stapled in the same manner as the original.
- C. The documents to be produced pursuant to each request should be segregated and specifically identified to indicate clearly the particular numbered request to which they are responsive.
- D. If any responsive document or information cannot be produced in full, you are to produce it to the extent possible, indicating which document, or portion of that document, is being withheld, and the reason that document is being withheld.
- E. If a document once existed and has subsequently been lost, destroyed, or is otherwise missing, please provide sufficient information to identify the document and state the details concerning its loss or destruction.
- F. Documents not otherwise responsive to this Subpoena shall be produced if such documents mention, discuss, refer to, or explain the documents that are called for by this Subpoena, or if such documents are attached to documents called for by this Subpoena and constitute routing slips, transmittal memoranda, or letters, comments, evaluations, or similar materials.
- G. If you do not possess, control, or have custody of any documents responsive to any numbered request set forth below, state this fact by so specifying in your response to said request.
- H. The use of the singular form of a word includes the plural and vice versa. In addition, the use of any tense of any verb includes all other tenses of the verb.
- I. Electronically Stored Information (ESI) is to be produced in the form in which it is ordinarily maintained. For example, native files would include email, spreadsheets and word processing files. Responsive documents that exist in electronic format shall be provided in native format (e.g., Microsoft Word files (.doc) or Outlook (.pst), emails, spreadsheets and word processing documents) with standard metadata intact, as outlined below. Prior to any Production of responsive data from a structured database (e.g., Oracle, SAP, SQL, MySQL, QuickBooks, etc.), the producing party shall first provide the database dictionary and a list of all reports that can be generated from the structured database. The list of reports shall be provided in native Excel (.xls) format. The database format will be requested for production after both parties agree on the format. Please include sufficient identification of the applicable software program to permit access to, and use of, each document. All attachments must be linked to their electronic documents. Native files should be provided in directories which are identifiable as responsive to a specific document request. All documents produced in native form should be produced on CDROM, DVDROM, External USB, or other similar drive media of a type that can be read by any standard computer. Unless otherwise agreed to, standard metadata in



electronically stored information shall be preserved and produced, such as: Custodian, To, From, CC, BCC, Dates and Times (Sent, Received and Modified), Attachments, Links and Document types. A more complete list can be provided upon request. Questions regarding electronic production should be directed to the Assistant Attorney General whose name appears on this Subpoena. Arrangements will be made for the communication with the appropriate in-house technical expert.

- J. If you claim the attorney-client privilege, work-product privilege, or any other privilege, for any document, provide a detailed privilege log that contains at least the following information for each document that you have withheld:
- 1) The name of each author, writer, sender or initiator of such document or thing, if any;
  - 2) The name of each recipient, addressee or party for whom such document or thing was intended, if any;
  - 3) The date of such document, if any, or an estimate thereof so indicated if no date appears on the document;
  - 4) The general subject-matter as described on such document; if no such description appears, then such other description sufficient to identify said document; and,
  - 5) The claimed grounds for withholding the document, including, but not limited to, the nature of any claimed privilege and grounds in support thereof.
- Q. TRADE SECRET PROTECTION. In the event you seek to assert trade secret protection under Florida Statutes section 119.0715, or other applicable Florida Statutes, for each document for which trade secret protection is claimed:
- 1) Provide prior to, or simultaneous with, production of the document at issue, a sworn affidavit from a person with knowledge as to the basis for the trade secret claim, which complies with the following requirements:
    - a. The affidavit should specify the bates range of the claimed trade secret documents at issue, generally describe the documents at issue, and provide evidence of the application of the trade secret exemption.
    - b. The affidavit should attach a certification (similar in form to a traditional privilege log) that identifies the following information for each separate claimed trade secret document: (i) the bates range of the document; (ii) a description of the document sufficient to determine the application of the trade secret exemption; and (iii) the specific element(s) or provision(s) of section 688.002 that render the document at issue a trade secret exempted from public records.
  - 2) Segregate and separately label the documents claimed as trade secrets as follows:
    - a. Documents produced electronically should be produced on separate CD or electronic media clearly labeled "Trade Secret" on the physical media as well in the title of the electronic folder or file;

- b. Documents produced in hard copy should be separated and each clearly labeled "Trade Secret."
  - 3) Any challenge to the application of the trade secret exemption shall be rebutted, if at all, only by you and not by the Office of the Attorney General, whose involvement shall be limited solely to providing notice to you of any challenge to your claim of trade secret protection. To the extent you seek to assert a trade secret exemption in connection with a public records request to the Office of the Attorney General, you shall be obligated to seek an appropriate protective order or otherwise establish the applicability of the trade secret claim and exemption. Failure to do so shall render the documents subject to production under any applicable public records requirements and not protected by a trade secret claim.
- R. DOCUMENT PRESERVATION. All document destruction or retention policies and practices and electronic file deletion or disk management policies and practices (including, but not limited to, reformatting practices) that could have the effect of altering or deleting information requested by this Subpoena should be suspended.
- 1) Because electronically stored information is an important and irreplaceable source of evidence, you must take appropriate steps to preserve all potentially relevant documents within your control or (practical ability to access], which includes, but is not limited to, preserving information from computer systems, removable or portable electronic media (like CDs/DVDs, USB drives), e-mail, text/instant messaging, "tweets" and other electronic correspondence at work and other locations, word processing documents, spreadsheets, databases, calendars, telephone logs, cell phones, voicemail, blogs, social media, internet usage files, website data, personal computers/laptops, personal data assistants (PDAs), servers, and archives/backup files, as well as other tangible documentation that will be relevant to the discovery of admissible evidence in this matter, so as to avoid any potential claims for spoliation of evidence. This request pertains not only to documents that are directly responsive to this Subpoena, but to all other documents that relate to the subject of our investigation as well.
  - 2) Preservation of electronic data in its native format is essential, as a paper printout of text contained in a computer file does not completely reflect all information contained within an electronic file. Additionally, due to its format, electronic evidence can be easily altered, deleted, corrupted or otherwise modified. Accordingly, you are required to take every reasonable step to preserve this information until the resolution of this matter. This includes, but is not limited to, the following obligations:
    - a) Discontinue all data destruction and overwriting/recycling processes of relevant data;
    - b) Preserve passwords, decryption procedures (and accompanying software), access codes, ID codes, etc.; and
    - c) Maintain all pertinent information and tools needed to access, review and reconstruct all requested or potentially relevant electronic data.
  - 3) Your obligations under the law are ongoing and should be considered in force and effect

until the resolution of this matter. Accordingly, regarding electronic data and documents that are created subsequent to the date of this Subpoena, relevant evidence is not to be destroyed or overwritten and you should take whatever steps are necessary to avoid destruction of potentially- relevant evidence.

WHEREFORE YOU ARE HEREBY COMMANDED TO PRODUCE:

Unless otherwise noted, the time period applicable to the following requests is January 2021, through the date upon which the response to this Subpoena is due and/or actually provided to the Office of the Attorney General, Statewide Prosecution, whichever occurs later in time.

Responsive documents that exist in electronic format shall be provided in native format (e.g., Microsoft Word files (.doc) or Outlook e-mails(.pst), and Microsoft Excel spreadsheets (.xls). Where an excel sheet or summary exists which contains the information requested below, it may be produced in lieu of the original documents if the replacement is sufficient to show the requested information.

1. All documents sufficient to show, describe, or explain the requirements, processes, and criteria for creating new user accounts on your platform, including but not limited to age and identity verification procedures, consent mechanisms for minors, terms of service and user agreements in effect during the relevant time period, any parental or guardian authorization procedures, and any automated or manual review processes used to validate new account registrations
2. All documents sufficient to identify and describe every child account registered on your platform indicative of the account holder being in Florida, including the user's age range, the date of account creation, and any other accounts linked to the same user or household, IP address used to create the account, geographic location of the account and whether the account is currently active
3. All exemplars, drafts, and final versions of marketing, promotional, or advertising materials whether digital, print, audiovisual, or otherwise that reference, depict, or concern the platform's suitability, safety, or appropriateness for minors or child users, including representations made to parents, guardians, or the public regarding age-appropriate content or parental controls.
4. All documents relating to the marketing of your platform to children, including internal planning documents, reports, or analyses involving promotions, giveaways, social media campaigns, celebrity or influencer endorsements, partnerships, use of cartoon imagery, music, or color schemes designed to appeal to children, as well as data-driven marketing practices involving surveillance, targeting, or behavioral personalization directed toward minors.
5. All documents reflecting the policies, procedures, and technical safeguards implemented to prevent children from being exposed to mature, explicit, or otherwise age-inappropriate content on your platform.
6. All documents supporting any statements, representations, or claims made in marketing or public-facing materials that suggest or imply your platform is "safe for all ages," "child-friendly," or otherwise suitable for children.

7. All documents sufficient to describe the parental control features available on your platform, including their operation, scope, limitations, and methods by which minors may circumvent or disable such features.
8. All documents sufficient to describe the design, operation, and functionality of chat moderation, content moderation, and reporting systems on Your platform, including human and automated review processes.
9. All documents sufficient to identify employees or contractors responsible for developing, implementing, or enforcing age verification, content moderation, and child safety protocols, including names, job titles, employment dates, and supervisory reporting structure.
10. All documents sufficient to describe the categories of personal information collected, stored, or processed about minors using Your platform, including the purposes for which such data is used.
11. All documents sufficient to describe moderation procedures, enforcement protocols, and safety guardrails used to detect, prevent, or remove inappropriate or harmful content or users.
12. All documents sufficient to identify any pending or concluded litigation, administrative action, or regulatory proceeding since January 2021 relating to the safety of minors or child protection issues involving your platform or any account user located in the State of Florida.
13. A list identifying each report submitted through your platform's reporting mechanisms or other internal systems by a user or parent alleging abuse, exploitation, grooming, endangerment, or other child safety violations. The list shall include the date received, the nature of the allegation, the account or username(s) involved, any internal reference or case number assigned, and the disposition or status of each report.
14. A listing identifying each report submitted through your platform's reporting mechanisms or other internal systems by a user or parent alleging abuse, exploitation, grooming, endangerment, or other child safety violations occurring on or through your platform, in which either the user or the alleged offender was located in Florida. The list shall include the date received, the nature of the allegation, the account or username(s) involved, any internal reference or case number assigned, and the disposition or status of each report.
15. A list identifying each instance in which a user or parent alleged abuse, exploitation, grooming, endangerment, or other child safety violations and submitted written or verbal notice to Roblox Corporation, your platform or any of its employees, agents or automated systems and in which the notice was then submitted to the National Center for Missing & Exploited Children (NCMEC). The list shall include, for each report, the date of submission to NCMEC, the nature of the reported conduct, the account username(s) involved, any internal reference or case number assigned, the user's and alleged

offender's self-reported or system-identified location, and the disposition or status of the report.

16. A list identifying each instance in which a user or parent alleged abuse, exploitation, grooming, endangerment, or other child safety violations and submitted written or verbal notice to Roblox Corporation, your platform or any of its employees, agents or automated systems and in which the notice was then submitted to the Florida Abuse Hotline (Department of Children and Families). The list shall include, for each report, the date of submission to the Florida Abuse Hotline, the nature of the reported conduct, the account username(s) involved, any internal reference or case number assigned, the user's and alleged offender's self-reported or system-identified location, and the disposition or status of the report.
17. A list identifying each instance in which a user or parent alleged abuse, exploitation, grooming, endangerment, or other child safety violations and submitted notice to Roblox Corporation, your platform or any of its employees, agents or automated systems and in which the notice was then submitted to the National Human Trafficking Hotline. The list shall include, for each report, the date of submission to the National Human Trafficking Hotline, the nature of the reported conduct, the account username(s) involved, any internal reference or case number assigned, the user's and alleged offender's self-reported or system-identified location, and the disposition or status of the report.
18. A list identifying each instance in which a user or parent alleged abuse, exploitation, grooming, endangerment, or other child safety violations and submitted notice to Roblox Corporation, your platform or any of its employees, agents or automated systems and in which the notice was then submitted to the Florida Human Trafficking Hotline. The list shall include, for each report, the date of submission to Florida Human Trafficking Hotline, the nature of the reported conduct, the account username(s) involved, any internal reference or case number assigned, the user's and alleged offender's self-reported or system-identified location, and the disposition or status of the report.
19. Documents reflecting the total number of accounts, broken down by month, that you have removed from your platform from January 2021, until September 2025, due to child safety issues as defined herein.
20. Documents sufficient to show parental control options relating to creating new User accounts on Your platform.
21. Documents sufficient to describe Your chat and game moderation capabilities.
22. Documents sufficient to identify your employees who were responsible for creating and enforcing your age verification protocols. Said documents should include the names, work title, address, and dates of employment of each employee as well as the name, work title, address, and dates of employment of that employee's direct supervisor.