



October 27, 2022

**VIA EMAIL**

Samuel A.A. Levine, Director, Bureau of Consumer Protection  
Serena Viswanathan, Associate Director, Division of Advertising Practices  
Federal Trade Commission  
600 Pennsylvania Ave. N.W.  
Washington, D.C. 20580  
slevine1@ftc.gov  
sviswanathan@ftc.gov

Re: Continuing Deceptive Marketing on Roblox

Dear Mr. Levine and Ms. Viswanathan:

We write to follow-up on our April 19, 2022 complaint to the FTC regarding deceptive marketing on and by Roblox. The metaverse gaming platform has recently reported to media outlets that, as of yesterday, “users under the age of 13 will no longer be eligible to see ads...”<sup>1</sup> This, however, is an inaccurate statement.

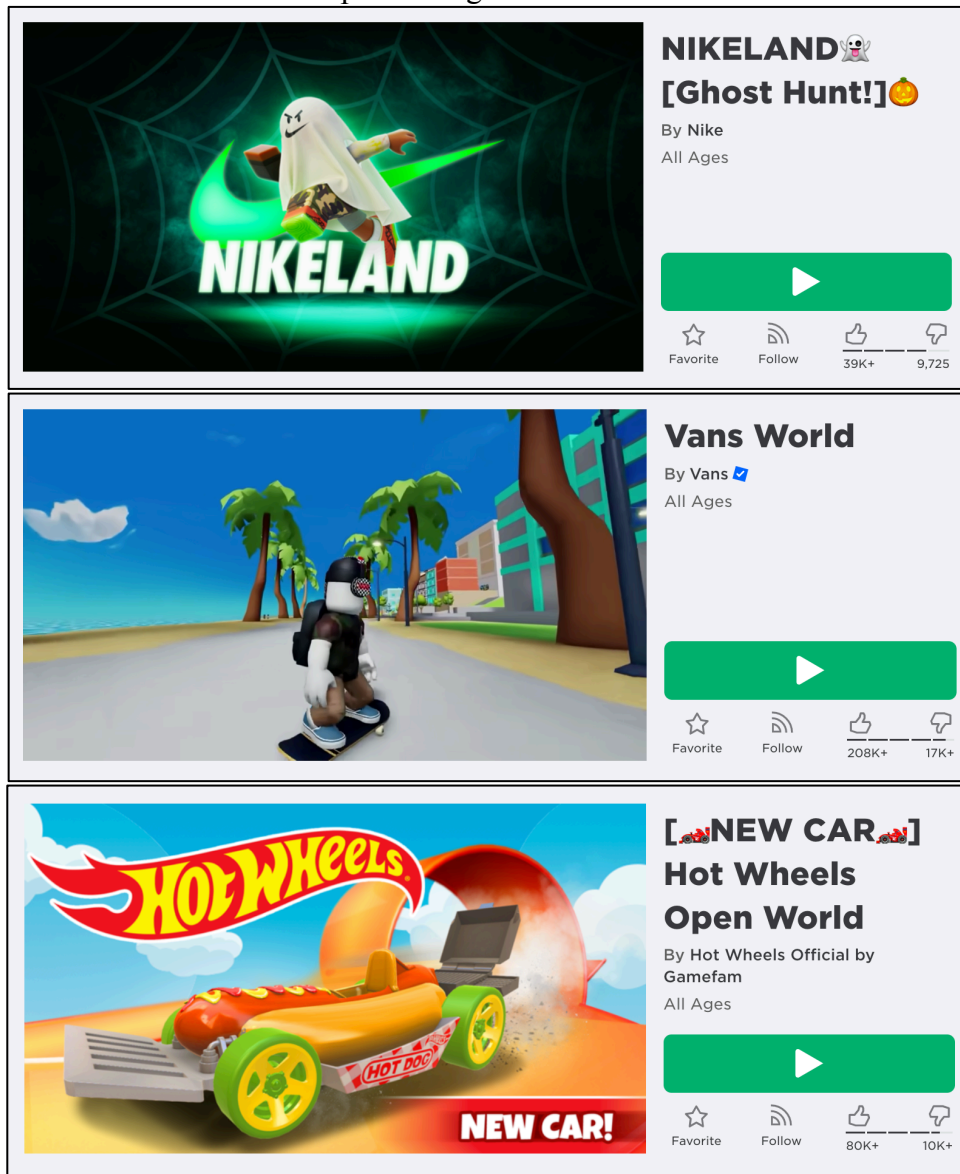
As of today, October 27, users of all ages, including young children whose parents have changed the settings on their children’s Roblox accounts so that they may only access content suitable for “all ages,” are still permitted to access advergames, including, for example, Nikeland,<sup>2</sup> Vans World,<sup>3</sup> and Hot Wheels Open World.<sup>4</sup>

**Allowed Experiences**

Choose the **highest age guideline** of experiences this account can join.  
All experiences are still searchable. Experiences without age guidelines are currently treated as 13+.

- 13+ (Suitable for ages 13 and older)
- 9+ (Suitable for ages 9 and older)
- All Ages (Suitable for everyone)

Examples of advergames on Roblox still accessible by young children despite settings shown above:



This appears to be because the age range that corresponds to such advergames is “All Ages” and thus “Suitable for everyone.”

All Ages Suitable for everyone

In short, despite Roblox’s public statements to the contrary, children on Roblox are not blocked from all advertising material; they are only blocked from advertisements by

marketers who have responsibly selected an older age range to correspond with their advergames.

TINA.org strongly urges the FTC to investigate these deceptive marketing tactics, as well as those discussed in detail in TINA.org's April 2022 complaint letter, and take appropriate enforcement action.

If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.



Bonnie Patten, Esq.  
Executive Director  
Truth in Advertising, Inc.

Cc: Mark Reinstra, General Counsel, Roblox  
Ann Miller, General Counsel, Nike, Inc.  
Laura Meagher, General Counsel, VF Corp.  
Jonathan Anshell, Chief Legal Officer, Mattel, Inc.

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<sup>1</sup> Roblox removes ads and sponsored opps for non-teens, Oct. 26, 2022, [https://kidscreen.com/2022/10/26/roblox-removes-ads-and-sponsored-opps-for-non-teens/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=roblox-removes-ads-and-sponsored-opps-for-non-teens&\\_u=C5QccOPrh7g%3d](https://kidscreen.com/2022/10/26/roblox-removes-ads-and-sponsored-opps-for-non-teens/?utm_source=newsletter&utm_medium=email&utm_campaign=roblox-removes-ads-and-sponsored-opps-for-non-teens&_u=C5QccOPrh7g%3d).

<sup>2</sup> Nikeland, <https://web.roblox.com/games/7462526249/NIKELAND-Ghost-Hunt>.

<sup>3</sup> Vans World, <https://web.roblox.com/games/6679274937/Vans-World>.

<sup>4</sup> Hot Wheels Open World, <https://web.roblox.com/games/5652023420/NEW-CAR-Hot-Wheels-Open-World>.