

JUL 17 2026

at 2 o'clock and 24 min. P.M.
Lucy H. Carrillo, Clerk

THEODORE HAUGLAND

99-009 Kalaloa St Ste D2016

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*Plaintiff, Pro Se*UNITED STATES DISTRICT COURT
DISTRICT OF HAWAIITHEODORE HAUGLAND, individually
and on behalf of all others similarly
situated,

PLAINTIFF(s),

v.

STRIPE, INC., a Delaware corporation;
ROBLOX CORPORATION, a Delaware
corporation,

DEFENDANT(S).

C'26 00373 HG RT

Case No.: [To Be Assigned]

Judge: [To Be Assigned]

CLASS ACTION COMPLAINT

AND DEMAND FOR JURY TRIAL

CLASS ACTION COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff appears pro se and is the lead plaintiff and class representative in this action. Plaintiff is the parent and legal guardian of 2 minor children who used the Roblox platform during the Class Period.

I. PARTIES

A. Plaintiff

1. **Name:** Theodore Haugland (pro se)
2. **Street Address:** 99-009 Kalaloa St Ste D2016
3. **City and County:** Aiea, Honolulu County
4. **State and Zip Code:** Hawaii 96701
5. **Telephone Number:** (202) 933-3332
6. **E-mail Address:** administrator@civillawinc.com

B. Defendant(s)

1. **Defendant 1: Roblox Corporation**
2. **Type:** Delaware corporation
3. **Principal Place of Business:** 970 Park Place, San Mateo, CA 94403
4. **Registered Agent (Delaware):** Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808
5. **Defendant 2: Stripe, Inc.**
6. **Type:** Delaware corporation
7. **Principal Place of Business:** 510 Townsend Street, San Francisco, CA 94103
8. **Registered Agent (Delaware):** Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808
9. **Doe Defendants 1–50** — unknown third parties, SDK providers, advertisers, employees, officers, and other entities who participated in, facilitated, or benefited from the unlawful conduct alleged herein. Plaintiff will seek leave to amend to identify Doe Defendants as discovery proceeds.

II. BASIS FOR JURISDICTION

A. Federal Question

1. This Court has original jurisdiction under 28 U.S.C. § 1331 because this action arises under federal statutes, including the Electronic Communications Privacy Act (ECPA), 18 U.S.C. §§ 2510–2523; the Stored Communications Act (SCA), 18 U.S.C. §§ 2701–2713; and the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. §§ 1961–1968.

B. Alternative Jurisdiction (CAFA)

2. In the alternative, jurisdiction exists under the Class Action Fairness Act, 28 U.S.C. § 1332(d), because the proposed nationwide class contains well over 100 members, minimal diversity exists, and the aggregate amount in controversy exceeds \$5,000,000.

C. Supplemental Jurisdiction

3. This Court has supplemental jurisdiction over the Hawaii statutory and common-law claims under 28 U.S.C. § 1367 because they arise from the same nucleus of operative facts as the federal claims.

III. VENUE AND PERSONAL JURISDICTION**A. Venue**

1. Venue is proper in the District of Hawaii under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claims occurred in this District: Plaintiff resides in this District; the minor child's communications were transmitted from devices located in this District; and unauthorized charges were processed from Plaintiff's Hawaii-based financial accounts.

B. Personal Jurisdiction

2. Defendants have sufficient contacts with Hawaii. Roblox and Stripe have purposefully availed themselves of the Hawaii market by soliciting and processing transactions of Hawaii residents and by directing services and marketing to Hawaii users. Defendants are subject to specific personal jurisdiction in this District.

IV. STATEMENT OF CLAIM

Plaintiff brings this action individually and on behalf of all others similarly situated to redress Defendants' systematic interception, access, disclosure, and monetization of minor users' electronic communications and personal information, and the processing of unauthorized financial transactions involving minor-user accounts. Plaintiff alleges that Roblox intercepted and stored electronic communications and disclosed stored communications to third parties without lawful authorization, and that Stripe knowingly processed unauthorized transactions and retained processing fees while possessing knowledge of Roblox's inadequate parental-consent and data-protection practices.

A. Factual Allegations

1. **Roblox's Platform and Conduct:** Roblox operates a child-directed interactive platform with a proprietary virtual currency (Robux), extensive social features (real-time chat, groups, in-experience communications), and a virtual economy that monetizes engagement. Roblox's systems capture communications and behavioral data in real time, store communications and behavioral records, integrate third-party SDKs that exfiltrate data, and employ design features (described as "dark patterns") that encourage impulsive spending by children.
2. **Stripe's Role:** Stripe served as Roblox's primary payment processor for Robux purchases and Premium subscriptions. Stripe received transaction metadata (including account age-tier designations), processed transactions through interstate payment networks, and collected processing fees. Plaintiff alleges Stripe had actual or constructive knowledge that many transactions involved under-13 accounts and that Roblox lacked verifiable parental consent, yet Stripe continued to process such transactions and retained fees.
3. **Legal Violations Alleged:** Roblox intercepted electronic communications in real time (ECPA/Wiretap Act), accessed and disclosed stored communications without authorization (SCA), and together with Stripe engaged in a pattern of racketeering activity (RICO) by executing a scheme to extract money and data from parents and

children. Plaintiff also alleges Hawaii statutory and common-law violations, including unfair and deceptive trade practices (Haw. Rev. Stat. § 480-2), deceptive trade practices (Haw. Rev. Stat. § 481A-3), computer crimes, negligence, breach of fiduciary duty, unjust enrichment, fraud, intrusion upon seclusion, civil conspiracy, and requests for declaratory and injunctive relief.

4. **Representative harms to Plaintiff:** Plaintiff's minor child used Roblox while located in Hawaii; Plaintiff's financial account was charged for Robux and/or Premium subscriptions processed by Stripe without adequate parental consent; Plaintiff paid Stripe processing fees on those unauthorized charges; Plaintiff's minor child's communications and personal data were intercepted, stored, and disclosed without lawful authorization; Plaintiff suffered economic loss, emotional distress, loss of parental control, and permanent privacy injury.

V. CLAIMS FOR RELIEF

Plaintiff realleges the foregoing paragraphs and asserts the following causes of action:

- A. **COUNT 1 - Violation of the Electronic Communications Privacy Act / Wiretap Act**, 18 U.S.C. §§ 2510–2523 — against Roblox.
- B. **COUNT 2 - Violation of the Stored Communications Act**, 18 U.S.C. §§ 2701–2702, 2707 — against Roblox and Stripe.
- C. **COUNT 3 - RICO Substantive Violation**, 18 U.S.C. § 1962(c) — against Roblox and Stripe.
- D. **COUNT 4 - RICO Conspiracy**, 18 U.S.C. § 1962(d) — against Roblox and Stripe.
- E. **COUNT 5 - Civil Conspiracy**, Hawaii common law — against Roblox and Stripe.
- F. **COUNT 6 - Hawaii Unfair and Deceptive Trade Practices (UDAP)**, Haw. Rev. Stat. § 480-2 — against Roblox and Stripe.
- G. **COUNT 7 - Hawaii Deceptive Trade Practices Act**, Haw. Rev. Stat. § 481A-3 — against Roblox and Stripe.
- H. **COUNT 8 - Hawaii Computer Crimes Act Violations**, Haw. Rev. Stat. §§ 708-890 et seq. — against Roblox.

- I. **COUNT 9 - Negligence and Gross Negligence** — against Roblox and Stripe.
- J. **COUNT 10 - Breach of Implied Contract** — against Roblox.
- K. **COUNT 11 - Unjust Enrichment / Restitution** — against Roblox and Stripe.
- L. **COUNT 12 - Fraudulent and Negligent Misrepresentation** — against Roblox (and Stripe as to payment-related representations).
- M. **COUNT 13 - Public Nuisance** — against Roblox.
- N. **COUNT 14 - Intrusion Upon Seclusion** — against Roblox.
- O. **COUNT 15 - Breach of Fiduciary Duty** — against Roblox; **Aiding and Abetting Breach of Fiduciary Duty** — against Stripe.
- P. **COUNT 16 - Declaratory and Injunctive Relief** — against all Defendants (28 U.S.C. §§ 2201–2202; Fed. R. Civ. P. 65).

VI. CLASS ALLEGATIONS

Plaintiff alleges numerosity, commonality, typicality, adequacy, predominance, and superiority under Fed. R. Civ. P. 23(a) and 23(b)(2)/(3). The classes are ascertainable from Defendants’ records. Plaintiff brings this action on behalf of himself and the following proposed classes:

- A. **Nationwide Class:** All persons in the United States who, during the Class Period (January 1, 2019 through judgment), had financial transactions processed by Stripe on the Roblox platform involving user accounts designated as under-13, resulting in charges to their financial accounts without verifiable parental consent.
- B. **Hawaii Subclass:** All members of the Nationwide Class who resided in Hawaii at the time of the unauthorized transaction(s).
- C. **Stripe Processing Subclass:** All persons charged by Stripe for Roblox transactions involving minor-user accounts lacking verifiable parental consent.
- D. **ECPA/SCA Subclass:** All persons whose minor children’s electronic communications were intercepted or whose stored communications were accessed or disclosed without lawful authorization.

VII. PRAYER FOR RELIEF

1 Plaintiff seeks relief on behalf of himself and the proposed classes as follows:

- 2 A. **Class Certification** under Fed. R. Civ. P. 23(a), 23(b)(2), and 23(b)(3); appointment of
3 Plaintiff as Class Representative; appointment of class counsel.
- 4 B. **Declaratory Judgment** that Defendants' conduct violated ECPA, SCA, RICO, and
5 Hawaii law.
- 6 C. **Injunctive Relief** requiring Defendants to: implement verifiable parental-consent and
7 age-verification mechanisms; cease unauthorized interception, collection, and disclosure
8 of minor users' communications and personal data; implement transaction-level parental
9 authorization for purchases by or on behalf of minors; delete unlawfully collected data
10 from children under 13; and submit to independent monitoring and reporting.
- 11 D. **Monetary Relief** including, as applicable and provable at trial: actual and compensatory
12 damages; statutory damages under ECPA (18 U.S.C. § 2520) and SCA (18 U.S.C. §
13 2707); treble damages under RICO (18 U.S.C. § 1964(c)); treble damages and statutory
14 remedies under Hawaii UDAP (Haw. Rev. Stat. § 480-13); restitution and disgorgement
15 of unjust enrichment; punitive damages; pre- and post-judgment interest; and costs and
16 attorneys' fees to the extent permitted by law.
- 17 E. **Other Relief** the Court deems just and proper, including appointment of a Special Master
18 or independent monitor to oversee compliance.

19 Plaintiff will quantify damages and statutory penalties in detail in the operative complaint and
20 through expert proof and discovery.

21 **PART VIII — JURY DEMAND**

22 88. Plaintiff is proceeding pro se at the time of filing. Plaintiff reserves the right to retain
23 qualified legal counsel and to move for appointment of class counsel pursuant to Federal
24 Rule of Civil Procedure 23(g) following the filing of this complaint. Nothing in this
25 complaint constitutes the provision of legal advice to any person, and Plaintiff does not
26 represent any other party in a legal capacity.

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UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

89. Pursuant to Federal Rule of Civil Procedure 11(b), Plaintiff, appearing pro se, certifies that to the best of Plaintiff's knowledge, information, and belief, formed after reasonable inquiry, this Complaint:

- A. is not being presented for any improper purpose;
- B. contains legal contentions that are warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law;
- C. contains factual contentions that have evidentiary support, or are identified as allegations that will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- D. does not contain any denials of factual contentions that are warranted on the evidence or, if so identified, are reasonably based on belief or a lack of information.

90. Pursuant to Federal Rule of Civil Procedure 38(b) and the Seventh Amendment to the United States Constitution, Plaintiff Theodore Haugland, individually and on behalf of all others similarly situated, hereby demands a trial by jury on all issues triable by jury in this action, including all factual questions underlying the legal claims asserted in this complaint.

Respectfully Submitted,

/Date/ JULY 17, 2026

/Signature/ Theodore Haugland

THEODORE HAUGLAND

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