

21st JUDICIAL DISTRICT COURT, PARISH OF LIVINGSTON
STATE OF LOUISIANA

NO. 194157

SECTION A

STATE OF LOUISIANA,
by and through its ATTORNEY GENERAL LIZ MURRILL

VERSUS

DISCORD INC.

**PETITION FOR INJUNCTIVE RELIEF, CIVIL PENALTIES, RESTITUTION,
AND OTHER RELIEF**

NOW INTO COURT, through undersigned counsel, comes Plaintiff, the State of Louisiana, by and through the Honorable Attorney General Liz Murrill, and respectfully submits the following Petition.

I. NATURE OF THE ACTION

1. This is an action brought by the State of Louisiana, through its Attorney General, to hold Defendant Discord Inc. ("Defendant") accountable for the facilitation and distribution of child sexual abuse material ("CSAM") and for the sexual exploitation of Louisiana's minor children through Defendant's online communications platform, Discord ("Discord"). Defendant is liable for its own unfair and deceptive business practices, including its repeated representations that Discord was designed to provide a safe environment for young users, all while Defendant knowingly designed, marketed, and operated Discord in a manner that exposed Louisiana children to the very dangers Defendant claimed that Discord was designed to prevent.

2. Discord is one of the world's largest communications platforms. It allows users to communicate through public servers, private channels, direct messages, voice calls, video calls, and screen sharing. Although Discord originated as a platform for gamers, it has evolved into a massive social platform used by millions of young people to communicate, form communities, and build relationships online.

3. Defendant presents Discord as a platform built on community, connection, and safety. Defendant has repeatedly assured parents, children, lawmakers, and the public that Discord is safe for young users, that safety is central to its mission, and that it maintains a zero-tolerance policy toward conduct that endangers children. Contrary to those representations, Defendant has long known that its design and default settings enable Discord to be used to groom, exploit, traffic, and sexually abuse minors.

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4. Discord is not a platform that incidentally attracts predators. Defendant's specific design choices make it easy for bad actors to locate vulnerable users, build trust quickly, and operate out of the public view. Defendant combines persistent pseudonymous identity, real-time voice and video, private group channels, direct messaging, and a community invitation system all in one application: Discord. The convergence of these modalities in a single platform creates a uniquely efficient environment for bad actors. And it is not accidental. It is the result of Defendant's deliberate design choices and business practices, which Defendant has refused to change despite escalating notice from law enforcement agencies, the United States Senate, child-safety organizations, and the attorneys general of multiple states.

5. For years, Defendant has known that its platform design enables predators to use Discord to locate, groom, exploit, and abuse children. Yet Defendant has continued to market Discord as a safe platform for minors while failing to implement effective safeguards consistent with its repeated public safety representations.

6. Defendant's public safety messaging created a veneer of safety that reassured parents and encouraged them to allow their children to use Discord. But in reality, children remained exposed to the very risks Defendant claimed to be protecting them against.

7. Although Defendant has recently announced additional safety initiatives and policy changes, those measures came only after years of mounting public scrutiny, regulatory investigations, lawsuits, and warnings from child-safety advocates. Even after those changes, testing by researchers has continued to identify sexually explicit content, adult-minor interactions, and exploitation risks that Defendant's revised measures still failed to prevent.

8. Defendant's conduct—including its affirmative representations concerning safety, design choices, and business practices—contributed directly to the widespread grooming, exploitation, and abuse of children on Discord, including children in Louisiana. Through this action, the State seeks to hold Defendant accountable for its conduct and obtain relief necessary to protect Louisiana children from further harm.

9. The Attorney General of Louisiana, as the chief legal officer of the State and entrusted with the solemn duty to safeguard its citizens from abusive, unlawful, and exploitative corporate conduct, brings this action to seek restitution and/or disgorgement of Defendant's illicit gains, the imposition of civil penalties, recovery of attorneys' fees and costs, injunctive relief, actual damages, and all other remedies, orders, and judgments authorized under Louisiana law.

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II. PARTIES

10. This action is brought for and on behalf of the sovereign State of Louisiana, by and through its duly elected Attorney General, Liz Murrill. The Attorney General, as chief legal officer of the State, is statutorily authorized to initiate and prosecute any and all suits deemed necessary for the protection of the interests and rights of the State pursuant to La. R.S. §§ 13:5036, 49:257, 51:1411, 51:1404, 51:1405, 51:1407 and related statutes and Louisiana law. Specifically, the Attorney General is authorized to initiate and prosecute suits to penalize conduct that constitutes unfair or deceptive trade practices.

11. Defendant Discord Inc. (“Defendant”) is a Delaware corporation with its principal place of business in San Francisco, California. Defendant owns, operates, controls, produces, develops, designs, engineers, manufactures, tests, advertises, markets, sells, distributes and/or otherwise places Discord into the stream of commerce. Defendant provides Discord to all fifty states, including the state of Louisiana. Defendant is responsible for the acts, omissions, representations, business practices, operational decisions, and product-design decisions alleged herein.

III. JURISDICTION AND VENUE

12. This Court has jurisdiction over the State’s claims because they arise exclusively under Louisiana law.

13. This Court has personal jurisdiction over Defendant pursuant to La. C.C.P. art. 6, La. R.S. §§ 13:3201, 51:1407(A), 51:1418 and related statutes because Defendant engages in consumer transactions within the State of Louisiana, purposefully directs and/or directed its actions toward the State of Louisiana, and/or has the requisite minimum contacts within the State of Louisiana needed to permit this Court to exercise jurisdiction.

14. Venue is proper in this judicial district pursuant to La. C.C.P. art. 42, La. R.S. 51:1407 and related statutes. Defendant is a foreign corporation with no principal place of business in Louisiana but provided Discord throughout the State of Louisiana and has purposefully directed its activities and availed itself of the laws in the State of Louisiana. The events giving rise to the claims herein arose, in substantial part, through this State, including in this Parish.

IV. FACTUAL ALLEGATIONS

A. Defendant markets Discord as a communications app for children.

15. Discord is a communications app that allows users to chat over voice, video, and text messaging. Discord is organized into chat groups called “servers,” which are topic-based virtual

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spaces that users can join to engage in conversations with others. Servers are organized into subtopics called “channels,” which are divided into text and voice channels. In text channels, users post messages, upload files, and share images. In voice channels, users communicate through voice or video chat and screen share. Users can also send private messages via voice, video, or text.

16. Launched in 2015, Discord quickly became the top app for gamers looking to communicate while playing videogames. The company’s founders, Jason Citron and Stan Vishnevskiy, shared a love of video games since childhood and created a service for gamers to seamlessly communicate with each other.¹ Defendant has since deliberately expanded Discord to include a wider audience of anyone looking to communicate with others about an endless array of topics. As Defendant puts it, “Discord is now where the world talks, hangs out, and builds relationships,” and “Discord lets anyone create a space to find belonging.”²

17. Although many users on Discord are adults, Defendant directly markets Discord to young users. For example, Defendant advertises Discord’s functionality for school clubs and offers “Student Hubs,” which are “dedicated places for students on Discord that make it easy to meet classmates from your own school, discover their communities on Discord, and share your servers for your fellow classmates to join.”³ Defendant also markets to young users with features such as “custom emoji, stickers, soundboard effects and more to add your personality to your voice, video, or text chat.”⁴ According to Defendant, these features are designed to “make your group chats more fun.”⁵

¹ Discord, *Create Space for Everyone to Find Belonging*, <http://web.archive.org/web/20250211124351/https://discord.com/company> (archived Feb. 11, 2025) (last visited Jun. 11, 2026).

² Discord, *Create Space for Everyone to Find Belonging*, <http://web.archive.org/web/20250211124351/https://discord.com/company> (archived Feb. 11, 2025) (last visited Jun. 11, 2026).

³ Discord, *Discover Your Next Favorite Campus Club in Student Hubs*, Discord (Aug. 22, 2022), <https://discord.com/blog/discover-your-next-favorite-campus-club-in-student-hubs> (last visited Jun. 11, 2026).

⁴ Discord, *Group Chat That's All Fun & Games*, <https://discord.com/> (last visited Jun. 11, 2026).

⁵ Discord, *Group Chat That's All Fun & Games*, <https://discord.com/> (last visited Jun. 11, 2026).

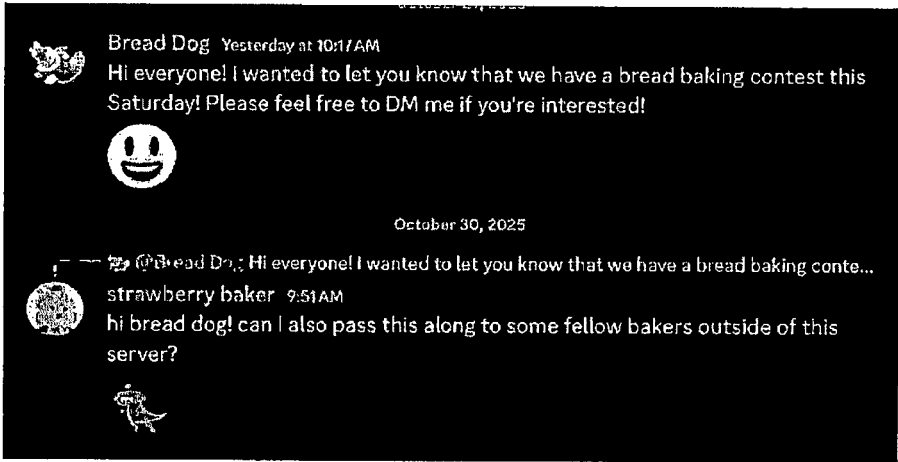
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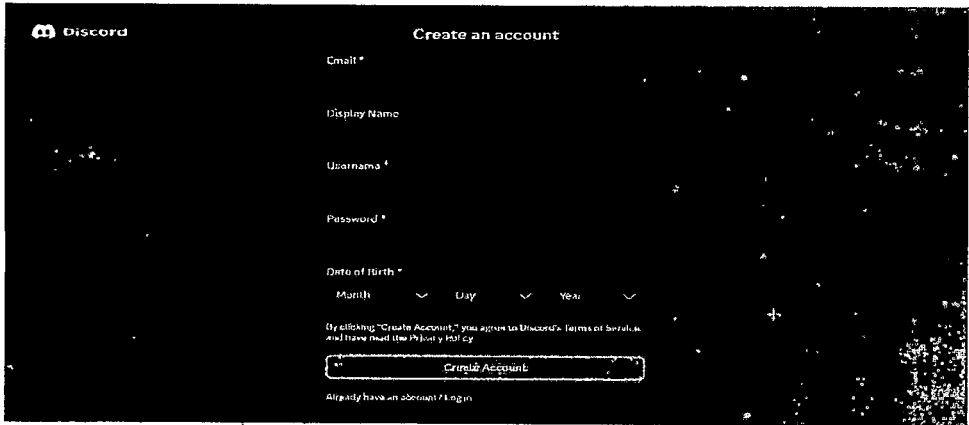
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Example of animated custom emoji from Defendant's website⁶

18. In recent years, Discord has exploded in popularity among young users, driven in part by the pandemic. As The New York Times explained in its article *How Discord, Born from an Obscure Game, Became a Social Hub for Young People*, “While adults working from home flocked to Zoom, their children were downloading Discord to socialize with other young people through text and audio and video calls in groups known as servers.”⁷
19. Creating an account on Discord is extremely easy. Users must provide only an email address, username, password, and self-declared birthdate. Users can then access Discord for free on their computers, tablets, and cellular devices.



Discord account creation screen

20. While Defendant's Terms of Service prohibit users under 13, Defendant does not verify age or identity. As a result, countless Discord users are under 13, many of whom state their real age in their bios, tell other users their real age in chats, and post photographs of themselves

⁶ Discord, *Custom Emojis: Animated Custom Emojis*, Discord, https://support.discord.com/hc/en-us/articles/360036479811-Custom-Emojis#h_01H06JVDAY2VKZBTRGJDY8NBV7 (last visited Jun. 11, 2026).
⁷ Kellen Browning, *How Discord, Born from an Obscure Game, Became a Social Hub for Young People*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html> (last visited Jun. 11, 2026).

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that plainly depict them as preteen children. There are children as young as eight years old using Discord.⁸

21. At the same time, as a practical consequence of Defendant's lack of age verification, a 45-year-old adult can create an account representing themselves as a 13-year-old and Defendant has no reliable mechanism to detect or prevent this. Or, a user banned from Discord can become fully operational on a new account within four minutes through VPN for IP masking, disposable email account creation, and a new username.⁹ The ban-evasion process is so frictionless that a permanent ban amounts to little more than a temporary inconvenience.

22. Although Defendant offers certain safety features, *Discord does not default to the highest safety settings upon account creation*. Instead, Defendant chose to design safety as an "opt-in" feature, placing the burden on the less technically sophisticated users rather than the platform. Rather than defaulting all users to its highest safety settings, Defendant defaults to only moderate restrictions for users who self-identify as minors, and it requires users to opt in for maximum protection. Because Defendant never verifies a user's age, the availability of these purported "default" protections depends entirely upon *an unverified self-reported birthdate* that any user—child or adult—can falsify with ease.

23. Certain content on Discord is "age-restricted," meaning in theory that children under 18 cannot access it. For years, Defendant did not allow server owners to self-designate entire servers as age-restricted, and so minors could easily access servers with age-restricted content even if designated age-restricted channels in the server were blocked. Defendant only recently provided server owners with the ability to self-designate entire servers as age-restricted. These restrictions, however, depend largely on the user's *self-reported age*. Simply put, Defendant deliberately chooses broader user engagement and content accessibility over child safety.

B. Defendant lures parents into letting their kids use Discord with promises of safety.

24. Since its inception, Defendant has repeatedly represented that Discord provides a safe place for children to spend their time interacting with others. These representations were directed to parents, children, lawmakers, educators, and the public and were intended to reassure consumers that Discord was a safe platform for minors.

⁸ Kellen Browning, *5 Ways Young People Are Using Discord*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-users-gen-z.html> (last visited Jun. 11, 2026).

⁹ Moishi Kramer, *Discord IP Ban: What It Is and How To Bypass*, Netnut (Nov. 21, 2024) <https://netnut.io/discord-ip-ban/> (last visited Jun. 12, 2026).

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25. According to Defendant, “in May 2015, Discord began as a way for us to all play games together, better. And Safer.”¹⁰ Defendant further states that the company has “always wanted Discord to be a place where one could safely play games with friends.”¹¹

26. For years, Defendant has promised that it has a “zero-tolerance policy” for anything relating to the sexual exploitation of children. For example, in Defendant’s July-September 2022 Transparency Report, Defendant emphasized that “Discord has a zero-tolerance policy for anyone who endangers or sexualizes children.”¹² Similarly, in a July 2023 website post titled “Discord’s Commitment to Teen and Child Safety,” Defendant assured parents that it “has a zero-tolerance policy for inappropriate sexual conduct with children and grooming,” with “special attention given to predatory behaviors such as online enticement and the sexual extortion of children.”¹³

27. Defendant assures parents that Discord is different from other communication products when it comes to child safety, assuring parents that “[w]e built Discord to be different and work relentlessly to make it a fun and safe space for teens.”¹⁴ Likewise, Defendant promises that “Discord Is Built On Safety,” and “Safety is at the core of everything we do and a primary area of investment as a business,” and that it “invest[s] talent and resources toward safety efforts.”¹⁵

28. Further, Defendant specifically assures parents that its app is designed to keep children safe and that it defaults to safety. For instance, in a website post titled *Settling into School with Discord*, Defendant informed parents that “[m]any teams across Discord work together to ensure that your teen finds belonging *by building products and policies with safety by default*.”¹⁶ And in a website post titled *Discord’s Commitment to Teen and Child Safety*, Defendant promised parents that “[w]e make our products safe spaces *by design and default*. Safety is and will remain part of Discord’s core experience.”¹⁷

¹⁰ Nelly, *Discord Safety Boost*, Discord (Mar. 28, 2017), <https://discord.com/blog/discord-safety-boost> (last visited Jun. 11, 2026).

¹¹ Nelly, *Discord Safety Boost*, Discord (Mar. 28, 2017), <https://discord.com/blog/discord-safety-boost> (last visited Jun. 11, 2026).

¹² Discord Safety, *Discord Transparency Report: July – September 2022* (Dec. 15, 2022), <https://discord.com/blog/discord-transparency-report-q3-2022> (last visited Sept. 17, 2025).

¹³ Discord, *Discord’s Commitment to Teen and Child Safety* (July 11, 2023), <https://discord.com/safety/commitment-to-teen-child-safety> (last visited Jun. 11, 2026).

¹⁴ Discord, *Discord’s Commitment to Teen and Child Safety* (July 11, 2023), <https://discord.com/safety/commitment-to-teen-child-safety> (last visited Jun. 11, 2026) (emphasis in original).

¹⁵ Nelly, *Discord Safety Boost*, Discord (Mar. 28, 2017), <https://discord.com/blog/discord-safety-boost> (last visited Jun. 11, 2026); and Discord, *Discord’s Commitment to a Safe and Trusted Experience* (May 12, 2022), <https://discord.com/safety/360043700632-discords-commitment-to-a-safe-and-trusted-experience> (last visited Jun. 11, 2026) (emphasis in original).

¹⁶ Savannah Badalich, *Settling into School with Discord*, Discord (Sept. 28, 2021), <https://discord.com/safety/settling-into-school-with-discord> (last visited Jun. 11, 2026) (emphasis added).

¹⁷ Discord, *Discord’s Commitment to a Safe and Trusted Experience* (May 12, 2022),

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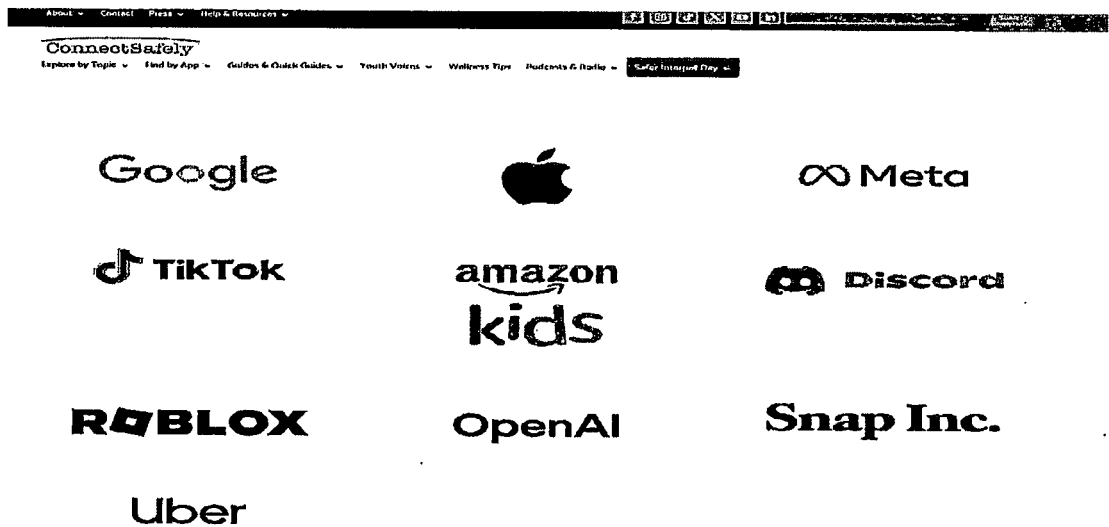


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29. Defendant’s deceptive playbook would not be complete without a misleading public relations campaign, where industry-funded “safety experts” praise Discord’s safety features. Indeed, according to ConnectSafely’s 2023 *Parent’s Guide to Discord*, “Discord has *default settings designed to keep minors safe*, such as automatically scanning direct messages for explicit images and videos.”¹⁸ Significantly, ConnectSafely—a non-profit ostensibly focused on educating people about internet safety—is funded by tech companies and lists Defendant Discord as one of its “supporters,”¹⁹ undermining the independence of this endorsement:



ConnectSafely’s list of supporters on its website

30. The information reported by ConnectSafely is false. Maximum protection is available only if a user affirmatively opts in. Even the more limited protections Defendant characterizes as “default” protections are available only if the account holder self-identifies as a minor—a representation Defendant never verifies. Consequently, Defendant’s purported “safety by default” depends entirely upon the accuracy of an honor-system birthdate that any user can falsify.

31. The “default settings” praised by this industry-funded “safety expert” include “Teen Safety Assist,” which, according to Defendant, (1) “automatically blur[s] media that may be sensitive in direct messages and group direct messages with friends, as well as in servers,” and (2)

¹⁸ <https://discord.com/safety/360043700632-discords-commitment-to-a-safe-and-trusted-experience> (last visited Jun. 11, 2026) (emphasis added).
ConnectSafely, *Parent’s Guide to Discord*, <https://web.archive.org/web/20230714165101/https://connectsafely.org/wp-content/uploads/2021/09/Parents-Guide-to-Discord.pdf> (archived July 14, 2023) (last visited Jun. 11, 2026) (emphasis added).
¹⁹ ConnectSafely, *Supporters*, <https://connectsafely.org/about-us/supporters/> (last visited Jul. 22, 2026).

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sends “safety alerts” to teen users when they receive a direct message from a user for the first time.²⁰

32. In addition, Defendant insists, “We take the safety of our teen users seriously and don’t allow children under the age of 13 to have a Discord account...”²¹

33. Defendant’s Transparency Report for January – June 2024 states at the outset: “We built Discord to be the best communication tool for people to hang out and talk together around playing their favorite games. To achieve this mission, we know that Discord must be a safe space for our users. That’s why safety is integrated into every aspect of our product and policies, and why about 15% of all Discord employees are dedicated to this work.”²²

34. Defendant also claims that “safety considerations aren’t just a ‘step’ or an item on a to-do list — they’re fully integrated into our design process.”²³

35. While *Defendant represents that Discord is designed to default to safety*, it simultaneously and inconsistently instructs parents on *how to change the default safety settings to keep their child safe*. For years, Defendant has consistently assured parents that they can use the company’s “tools to protect [their children] from inappropriate content or unwanted contact.”²⁴ Defendant, for example, tells parents they can turn on an “explicit image filter” that will “[a]utomatically block direct messages that may contain explicit images.”²⁵ Defendant also informs parents that they can disable the direct message setting that allows anyone in a server to privately message their children.²⁶ Defendant also promises parents that they can change their child’s “Friend request settings” to limit who can send them a friend request—*i.e.*, “Everyone,” “Friend of friends,” or “Server members.”²⁷

²⁰ Savannah Badalich, *Building a Safer Place for Teens to Hang Out*, Discord (Oct. 24, 2023), <https://discord.com/safety/safer-place-for-teens> (last visited Jun. 11, 2026).

²¹ Discord, *Teen and Child Safety Policy Explainer*, <https://discord.com/safety/child-safety-policy-explainer> (last visited Jul. 22, 2026).

²² Discord, *Discord Transparency Report: January – June 2024*, <https://discord.com/safety-transparency> (last visited Jun. 12, 2026).

²³ Discord, *How We Put Safety at the Center of Everything We Build*, <https://discord.com/safety/making-discord-safer-by-design> (last visited Jun. 12, 2026).

²⁴ Discord, *Helping Your Teen Stay Safe on Discord* (May 12, 2022), <https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (last visited Jun. 11, 2026); Discord, *Helping Your Teen Stay Safe on Discord*, <https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023) (last visited Jun. 11, 2026).

²⁵ Discord, *Helping Your Teen Stay Safe on Discord*, <https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023) (last visited Jun. 11, 2026).

²⁶ Discord, *Helping Your Teen Stay Safe on Discord* (May 12, 2022), <https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (last visited Jun. 11, 2026); Discord, *Helping Your Teen Stay Safe on Discord*, <https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023) (last visited Jun. 11, 2026).

²⁷ Discord, *Helping Your Teen Stay Safe on Discord* (May 12, 2022), <https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (last visited Jun. 11, 2026); Discord, *Helping Your Teen Stay Safe on Discord*, <https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023) (last visited Jun. 11, 2026).

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36. Defendant's CEO and co-founder Jason Citron reiterated many of these assurances nearly verbatim in his January 31, 2024 testimony to the U.S. Senate as part of its hearing on "Big Tech and the Online Child Sexual Exploitation Crisis." Citron began his written testimony "by stating clearly that Discord has a zero-tolerance policy for content or conduct that endangers or sexualizes children."²⁸ And, according to Citron, Defendant "has a zero-tolerance policy for inappropriate sexual conduct with children, meaning inappropriate sexual contact between adults and teens on the service, with special attention given to predatory behaviors such as online enticement and the sexual extortion of children, commonly referred to as 'sextortion.'"²⁹

37. In addition, Citron emphasized Defendant's "multi-pronged approach" to child safety, including the company's "approach to product development, whereby we implement a rigorous 'safety by design' practice when developing products."³⁰ As Citron elaborated, "[b]ecause safety is critical to our core mission, Discord takes a 'safety by design' approach to our work."³¹

38. Citron also highlighted Defendant's "sophisticated tools" for parents to keep their children safe, as well as the company's "features designed to keep teens safe on our platform," such as Teen Safety Assist, which flags "potentially unwanted conversations to teen users in Discord" and "automatically blur[s] potentially sensitive media to teens in DMs, GDMs, and in servers."³²

39. Citron has made similar statements to the public. For example, at Bloomberg's Tech Summit in 2023, Citron said that he found reports of child exploitation on Discord "horrifying" and that Defendant took the issue "very seriously," noting that Defendant employs a dedicated child safety team that is tasked with trying to prevent exploitation on the platform "in a way that respects the privacy of all the people who are not doing these things."³³ And in a 2024 podcast,

safe-on-discord (archived July 11, 2023) (last visited Jun. 11, 2026).

²⁸ Jason Citron, *Testimony: Hearing Before the U.S. Senate Committee on the Judiciary: Big Tech and the Online Child Exploitation Crisis* (Jan. 31, 2024), https://www.judiciary.senate.gov/imo/media/doc/2024-01-31_testimony_-_citron.pdf (last visited Jun. 11, 2026).

²⁹ Jason Citron, *Testimony: Hearing Before the U.S. Senate Committee on the Judiciary: Big Tech and the Online Child Exploitation Crisis* (Jan. 31, 2024), https://www.judiciary.senate.gov/imo/media/doc/2024-01-31_testimony_-_citron.pdf (last visited Jun. 11, 2026).

³⁰ Jason Citron, *Testimony: Hearing Before the U.S. Senate Committee on the Judiciary: Big Tech and the Online Child Exploitation Crisis* (Jan. 31, 2024), https://www.judiciary.senate.gov/imo/media/doc/2024-01-31_testimony_-_citron.pdf (last visited Jun. 11, 2026).

³¹ Jason Citron, *Testimony: Hearing Before the U.S. Senate Committee on the Judiciary: Big Tech and the Online Child Exploitation Crisis* (Jan. 31, 2024), https://www.judiciary.senate.gov/imo/media/doc/2024-01-31_testimony_-_citron.pdf (last visited Jun. 11, 2026).

³² Jason Citron, *Testimony: Hearing Before the U.S. Senate Committee on the Judiciary: Big Tech and the Online Child Exploitation Crisis* (Jan. 31, 2024), https://www.judiciary.senate.gov/imo/media/doc/2024-01-31_testimony_-_citron.pdf (last visited Jun. 11, 2026).

³³ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rca89769> (last visited Jun. 12, 2026).

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Citron stated that, “it’s really important to us that people feel comfortable and safe using Discord, and adults are more equipped to manage their own stuff. We think teens need some more help. But sometimes adults don’t want to manage their space, and that’s where our teams come in.”³⁴

40. Defendant’s public safety messaging created a veneer of safety that reassured parents and encouraged them to allow their children to use Discord. In reality, the protections touted by Defendant failed to provide the level of protection that Defendant repeatedly represented parents and consumers would receive. The gap between Defendant’s safety promises and the reality of its platform left children exposed to the very harms Defendant claimed it was preventing.

C. In reality, Discord is a digital and real-life nightmare for children.

41. Although Defendant assures parents that Discord is built on safety and has zero tolerance for content or conduct that endangers children, in fact, Defendant has created and maintains an environment on Discord in which the sexual exploitation of children is rampant and thriving. Moreover, Defendant is well aware that child-safety organizations, law enforcement, journalists, and regulators have repeatedly identified Discord as a platform used to facilitate the grooming, exploitation, and sexual abuse of minors—yet Defendant continues to make the same safety representations. The result has been devastating, with countless children suffering irreversible harm.

1. Despite Defendant’s safety representations, Discord contains widespread CSAM and other illegal sexual content.

42. Discord is overflowing with sexually explicit images and videos involving children, including anime and CSAM—i.e., child pornography. Defendant provides access to these materials not only to adults but also to child users, creating an ecosystem that breeds pedophilia and exposes children to this unlawful content.

43. The content of this material is beyond disturbing. For example, numerous Discord servers contain anime images of children being brutally assaulted and raped by male adults.

³⁴ Nilay Patel, *Discord CEO Jason Citron Makes the Case for a Smaller, More Private Internet*, The Verge, Decoder (Apr. 22, 2024), <https://www.theverge.com/24134914/discord-ceo-gaming-chat-teens-safety-moderation-decoder-interview> (last visited Jun. 12, 2026).

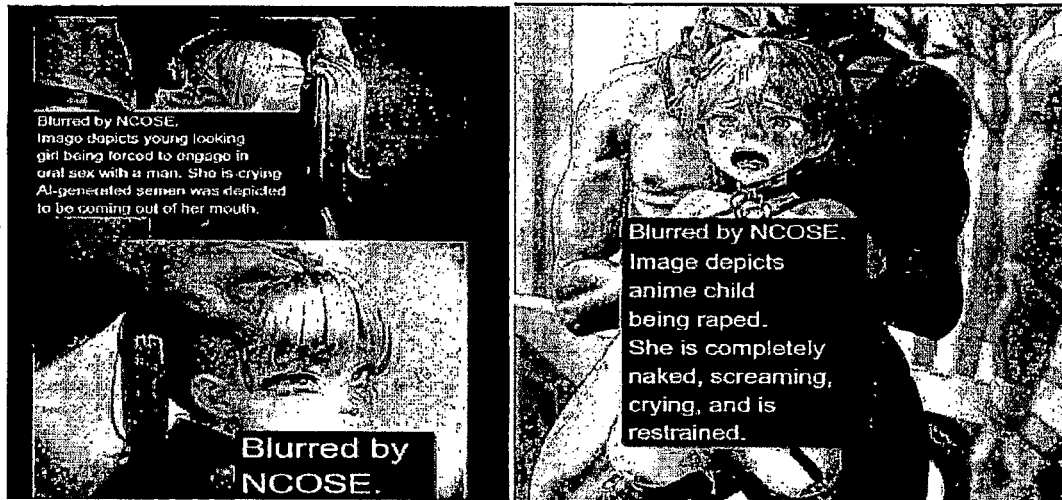
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Examples of images obtained on Discord servers³⁵

44. Discord is also permeated with actual child pornography, or CSAM, hosting hundreds if not thousands of servers dedicated to trading and sharing CSAM. In 2023, the National Center on Sexual Exploitation (“NCOSE”) reported that its staff easily located such servers using minor-aged accounts within only a few clicks.³⁶ NCOSE further reported that, using minor-aged accounts, its researchers were inadvertently exposed to images and links to what appeared to be CSAM on a Discord server—despite Defendant’s purported safeguards.³⁷

45. In a June 2023 article, NBC News reported that “[i]n a review of publicly listed Discord servers created in the last month,” it “identified 242 that appeared to market sexually explicit content of minors, using thinly veiled terms like ‘CP’ that refer to child sexual abuse material.”³⁸

46. Predators themselves even admit that Discord is a go-to app for them for finding and sharing CSAM. In February 2024, a nonprofit called Protect Children released a report, “Tech Platforms Used by Online Child Sexual Abuse Offenders,” which contained survey data from anonymous individuals searching for CSAM on the dark web. That survey revealed that Discord is one of their “top platforms” for searching for, viewing, or sharing CSAM.³⁹ Based on the results

³⁵ National Center on Sexual Exploitation, *Evidence of Exploitation Collected on Discord*, https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-2023DDL_Discord.pdf (last visited Jun. 11, 2026).

³⁶ National Center on Sexual Exploitation, *Evidence of Exploitation Collected on Discord*, https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-2023DDL_Discord.pdf (last visited Jun. 11, 2026).

³⁷ National Center on Sexual Exploitation, *Evidence of Exploitation Collected on Discord*, https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-2023DDL_Discord.pdf (last visited Jun. 11, 2026).

³⁸ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 11, 2026).

³⁹ Protect Children, *Tech Platforms Used By Online Child Sexual Abuse Offenders* (Feb. 2024), <https://www.suojellaanlapsia.fi/en/post/tech-platforms-child-sexual-abuse> (last visited Jun. 11, 2026).

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of this survey, the report found an “unmistakable overlap” between “the platforms most used for viewing and sharing CSAM and the platforms most popular among children and young people.”⁴⁰

47. From its beginning, Discord has been at the center of numerous criminal cases involving CSAM. According to court documents from a federal case involving a vast CSAM enterprise and conspiracy, between 2016 and 2018, ten men “utilized chatrooms on the online service ‘Discord’—an application designed for online gaming communities that allows users to engage in text chat and share images and videos—to produce and exchange child pornography.”⁴¹ They pled guilty and were sentenced to long prison terms. Similarly, according to court documents in another case, between 2019 and 2020, a North Carolina man was able to use Discord to chat about and trade CSAM.⁴² He pled guilty and was sentenced to 240 months in federal prison.

48. Similar incidents occurred throughout 2021 and 2022. In 2021, for example, federal authorities arrested an Idaho man after locating numerous files of CSAM that he had uploaded to his Discord account.⁴³ And in 2022, a Louisiana man pled guilty to possessing CSAM, admitting that “he created a Discord account,” that “other Discord users would share CSAM on the website,” and that he would “upload the saved CSAM from his phone to other Discord users.”⁴⁴ Several months later, a New Jersey man was arrested for uploading and distributing CSAM using Discord.⁴⁵ And two months later, a University of Florida quarterback was arrested and accused of sharing CSAM on Discord.⁴⁶ When the man spoke with the police after his arrest, he admitted that he had been on Discord servers that “discuss, solicit, and distribute child sexual abuse material.”⁴⁷

49. 2023 was no different. For example, at the start of the year, a New York man was

⁴⁰ Protect Children, *Tech Platforms Used By Online Child Sexual Abuse Offenders* (Feb. 2024), <https://www.suojellaanlapsia.fi/en/post/tech-platforms-child-sexual-abuse> (last visited Jun. 11, 2026).

⁴¹ U.S. Dep’t of Justice, *Ten Men Sentenced to Prison for Their Roles in a Child Exploitation Enterprise and Conspiracy* (Oct. 1, 2020), <https://www.justice.gov/opa/pr/ten-men-sentenced-prison-their-roles-child-exploitation-enterprise-and-conspiracy> (last visited Jun. 11, 2026).

⁴² U.S. Dep’t of Justice, *Man In Possession Of Child Sexual Abuse Material Is Sentenced To 20 Years In Prison* (Feb. 17, 2023), <https://www.justice.gov/usao-wdnc/pr/man-possession-child-sexual-abuse-material-sentenced-20-years-prison> (last visited Jun. 11, 2026).

⁴³ U.S. Dep’t of Justice, *Nampa Man Sentenced to 6 Years in Federal Prison for Possessing Child Pornography* (Dec. 12, 2023), <https://www.justice.gov/usao-id/pr/nampa-man-sentenced-6-years-federal-prison-possessing-child-pornography> (last visited Jun. 11, 2026).

⁴⁴ U.S. Dep’t of Justice, *Registered Sex Offender Pleads Guilty to Possession of Child Sex Abuse Material* (May 10, 2022), <https://www.justice.gov/usao-cdla/pr/registered-sex-offender-pleads-guilty-possession-child-sexual-abuse-material> (last visited Jun. 11, 2026).

⁴⁵ News 12 Staff, *Prosecutor: Phillipsburg man distributed child pornography through Discord*, News12 The Bronx (Sept. 28, 2022), <https://bronx.news12.com/prosecutor-phillipsburg-man-distributed-child-pornography-through-discord> (last visited Jun. 11, 2026).

⁴⁶ Tim Stelloh & Antonio Planas, *University of Florida quarterback arrested and accused of sharing child sexual abuse images on Discord*, NBC News (Nov. 30, 2022), <https://www.nbcnews.com/news/us-news/university-florida-quarterback-arrested-allegedly-sharing-child-sexual-rcna59513> (last visited Jun. 11, 2026).

⁴⁷ Tim Stelloh & Antonio Planas, *University of Florida quarterback arrested and accused of sharing child sexual abuse images on Discord*, NBC News (Nov. 30, 2022), <https://www.nbcnews.com/news/us-news/university-florida-quarterback-arrested-allegedly-sharing-child-sexual-rcna59513> (last visited Jun. 11, 2026).

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arrested and charged with creating and sharing CSAM through Discord after a police investigation revealed that he had allegedly instructed a 13-year-old boy to provide images and videos of himself committing sex acts on a 4-year-old girl.⁴⁸ The next month, a Vancouver man was found guilty of numerous charges, including distributing and possessing CSAM, based largely on communications and videos the man shared on Discord showing the sexual assault of an infant by an adult man.⁴⁹

50. These incidents continued throughout 2024. In February, for example, a New Jersey man was arrested after an investigation revealed that he had uploaded to Discord a file depicting the sexual exploitation or abuse of minors.⁵⁰ At the time, the man was employed at a school serving students as young as five years old. A few months later, an Oklahoma man was arrested and charged with possessing and distributing CSAM after he shared CSAM on Discord.⁵¹ Later that year, a former Indiana firefighter was arrested after police learned he was trading CSAM on Discord.⁵²

51. Similar incidents occurred in 2025. For example, in January 2025, a Baton Rouge man was arrested on multiple child sex crime charges after investigators determined he coerced a 14-year-old girl to send “inappropriate photos” via Discord.⁵³ Deputies also linked him to another extortion case involving a 15-year-old, and law enforcement found CSAM on his Discord account during the investigation. In September 2025, a Florida man was arrested for possessing and sending child pornography and messaging minors online, with investigators finding hundreds of explicit images involving underage victims on his Discord account.⁵⁴ One victim reportedly began receiving messages at age 11.⁵⁵ That same month, a California man was sentenced to 14 years in

⁴⁸ *West New York Man Charged with Child Abuse Material*, Hudson Reporter (Jan. 19, 2023), <https://hudsonreporter.com/news/west-new-york/west-new-york-man-charged-with-child-abuse-material/> (last visited Jun. 11, 2026).

⁴⁹ Fox 12 Staff, *Washougal man gets 108 years for child rape, creating child sex assault materials*, Fox 12 Oregon (Mar. 25, 2023), <https://www.kptv.com/2023/03/25/washougal-man-gets-108-years-child-rape-creating-child-sex-assault-materials/> (last visited Jun. 11, 2026).

⁵⁰ Morris County Prosecutor’s Office, *Jefferson Resident Arrested for Child Pornography* (Feb. 16, 2024), <https://www.morriscountynj.gov/Departments/Prosecutor/Prosecutor-Press-Releases/Jefferson-Resident-Arrested-for-Child-Pornography> (last visited Jun. 11, 2026).

⁵¹ Fox23.com News Staff, *Wagoner man arrested, accused of distributing child pornography over Discord*, Fox 23 News (June 25, 2024), https://www.fox23.com/news/wagoner-man-arrested-accused-of-distributing-child-pornography-over-discord/article_520191ec-333c-11ef-87b7-3bffc2affd71.html (last visited Jun. 11, 2026).

⁵² Joe Schroeder, *Docs: Ex-Indiana firefighter traded porn on Discord, dated a 17-year-old*, Fox 59 (Sept. 4, 2024), <https://fox59.com/news/indycrime/docs-ex-indiana-firefighter-traded-child-porn-on-discord-dated-a-17-year-old/> (last visited Jun. 11, 2026).

⁵³ WAFB staff, *Man accused of internet child sex crimes allegedly met victims on Roblox, Discord*, WAFB9 (Jan. 31, 2025), <https://www.wafb.com/2025/01/31/man-accused-internet-child-sex-crimes-allegedly-met-victims-roblox-discord/> (last visited June 12, 2026).

⁵⁴ Ryan Wyatt Turbeville, *Marion County Deputies Arrest 20-year-old for Sexually Exploiting Children on Discord*, X, WCJB20 (Sept. 22, 2025), <https://www.wcjb.com/2025/09/22/marion-county-deputies-arrest-20-year-old-sexually-exploiting-children-discord-x/> (last visited Jun. 12, 2026).

⁵⁵ Ryan Wyatt Turbeville, *Marion County Deputies Arrest 20-year-old for Sexually Exploiting Children on Discord*, X, WCJB20 (Sept. 22, 2025), <https://www.wcjb.com/2025/09/22/marion-county-deputies-arrest-20-year-old-sexually-exploiting-children-discord-x/> (last visited Jun. 12, 2026).

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federal prison after pleading guilty to coercion and enticement of minors and CSAM-related charges.⁵⁶ Prosecutors said the man used Discord to engage with at least a dozen victims aged 12 to 17, coercing them into sending explicit images and distributing child sexual abuse material, and in some cases maintaining in-person relationships.⁵⁷ In October 2025, a Tennessee man was arrested for sharing CSAM on Discord and charged with aggravated sexual exploitation of a minor and failing to register as a sex offender.⁵⁸

52. The incidents have not slowed in 2026. For example, in February 2026, a Michigan man was sentenced to at least 16 years in federal prison after pleading guilty to sexual exploitation of children and related charges; prosecutors said he used Discord (along with Roblox and Snapchat) to communicate with and sexually exploit minors by coercing them into producing explicit content and distributing their images.⁵⁹ And in March 2026, a North Carolina man was charged after he allegedly met an underage girl on Discord and other platforms, using those communications to coerce explicit images and make plans for abuse.⁶⁰ It was reported this man “made plans to drive to a 13-year-old girl’s home in Nebraska, pick her up, and bring her to North Carolina to sexually abuse her.”⁶¹ Court filings also allege he recorded the sexual abuse of an infant.⁶² Days later, a former science teacher was sentenced “for coercing and enticing at least one underage female to engage in sexual conversations online and requesting that she produce and send child sexual abuse material (CSAM) of herself.”⁶³ On Discord, he messaged at least 20 underage females between the ages of 12 and 17 located throughout the country, as well as the United Kingdom and Canada. In these chats, he engaged in online masturbation sessions with the

⁵⁶ Nicole Acosta, *Calif. Man, 20, Sexually Exploited a Dozen Girls on Discord — and Now He Learns Fate*, People (Sept. 15, 2025), <https://people.com/man-sexually-exploited-dozen-girls-discord-app-11810144> (last visited Jun. 12, 2026).

⁵⁷ Nicole Acosta, *Calif. Man, 20, Sexually Exploited a Dozen Girls on Discord — and Now He Learns Fate*, People (Sept. 15, 2025), <https://people.com/man-sexually-exploited-dozen-girls-discord-app-11810144> (last visited Jun. 12, 2026).

⁵⁸ Tony Garcia, *Cyber tip leads to TN man's arrest for sharing child sex abuse material online*, WSMV4 (Oct. 3, 2025), <https://www.wsmv.com/2025/10/03/cyber-tip-leads-tn-mans-arrest-sharing-child-sex-abuse-material-online/> (last visited Jun. 12, 2026).

⁵⁹ Samantha Sayles, *Monroe County man learns sentence after sexually exploiting children using Roblox, Discord, Snapchat*, Click On Detroit (Feb. 20, 2026), <https://www.clickondetroit.com/news/local/2026/02/20/monroe-county-man-learns-sentence-after-sexually-exploiting-children-using-roblox-discord-snapchat/> (last visited Jun. 12, 2026).

⁶⁰ WRAL staff, *FBI: Raleigh man sexually abused baby on video*, WRAL News (Mar. 20, 2026), <https://www.wral.com/news/local/raleigh-sexual-exploitation-teen-baby-teen-march-2026/> (last visited Jun. 12, 2026).

⁶¹ WRAL staff, *FBI: Raleigh man sexually abused baby on video*, WRAL News (Mar. 20, 2026), <https://www.wral.com/news/local/raleigh-sexual-exploitation-teen-baby-teen-march-2026/> (last visited Jun. 12, 2026).

⁶² WRAL staff, *FBI: Raleigh man sexually abused baby on video*, WRAL News (Mar. 20, 2026), <https://www.wral.com/news/local/raleigh-sexual-exploitation-teen-baby-teen-march-2026/> (last visited Jun. 12, 2026).

⁶³ *Former Boston Teacher Sentenced to 10 Years in Prison for Child Exploitation*, U.S. Attorney’s Office, District of Maryland (Mar. 13, 2026), <https://www.justice.gov/usao-ma/pr/former-boston-teacher-sentenced-10-years-prison-child-exploitation> (last visited Jun. 12, 2026).

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minors; solicited images from and exchanged images with the minors; and engaged in sexualized conversations with the minors while he was at school.

53. Through these numerous well-documented and publicized cases, as well as its own reporting to the National Center for Missing and Exploited Children, Defendant has long been aware of the proliferation of CSAM and similar material that Discord enables and facilitates.

54. Despite years of notice from outside sources, and Defendant's own knowledge that Discord enables the sexual exploitation of children and the creation, distribution, and sharing of CSAM, Defendant nevertheless continued to assure parents, lawmakers, and the public that Discord maintained a "zero-tolerance" policy toward conduct that endangers children and that safety remained central to Discord's design and operation.

2. Discord created a welcoming hunting ground for child sexual predators.

55. Defendant has also created a haven for predators seeking to identify, contact, groom, traffic, and sexually abuse minors by providing predators with endless opportunities for unmitigated interactions with children through public servers, direct messages, and video/voice chat channels, with no meaningful repercussions for such behavior.

56. Defendant hosts numerous servers that openly operate as spaces where children are sexually exploited by predators. In its June 2023 article on Discord, NBC News reported that it found numerous servers involving adults pretending to be teens to entice children into sharing nude images. NBC News described several servers that explicitly solicited minors to join "not safe for work" communities, including one server that promoted itself on the public server database as "a community for people between the ages of 13-17. We trade nudes, we do events. Join us for the best Teen-NSFW experience <3."⁶⁴ Another server claimed to accept "little girls 5-17 only" and had chat channels with titles such as "begging-to-have-sex-chat" and "sexting-chat-with-the-server-owner."⁶⁵ Still another server directly solicited nude images from minors to gain access: "YOU NEED TO SEND A VERIFICATION PHOTO TO THE OWNER. IT HAS TO BE NUDE."⁶⁶

⁶⁴ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 12, 2026).

⁶⁵ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 12, 2026).

⁶⁶ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 12, 2026).

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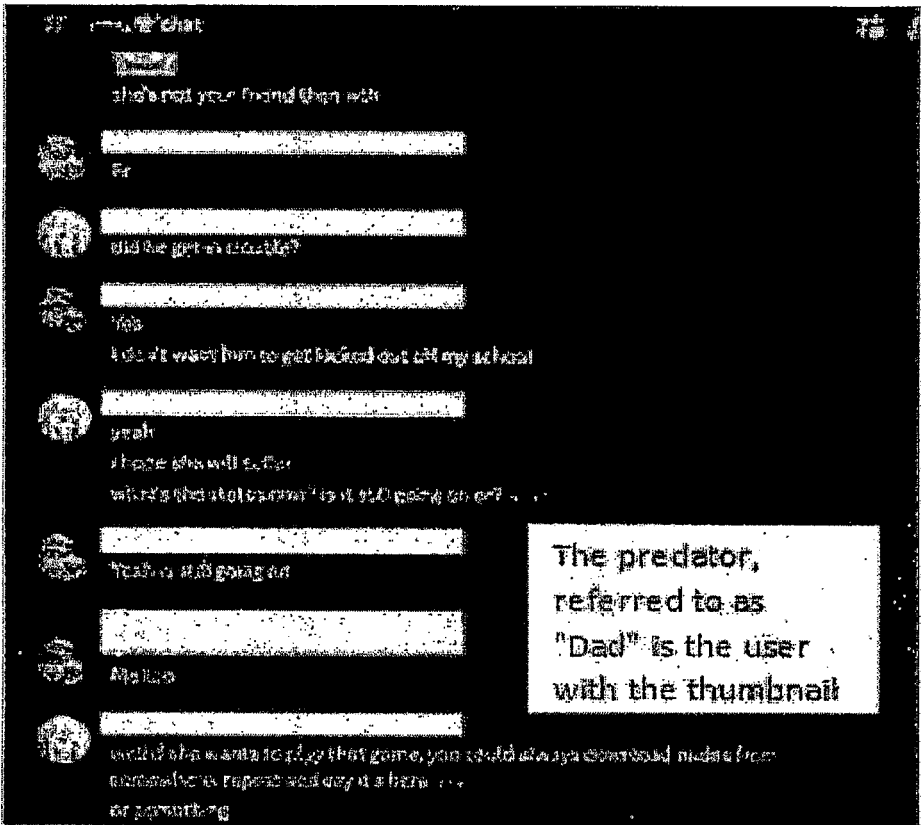
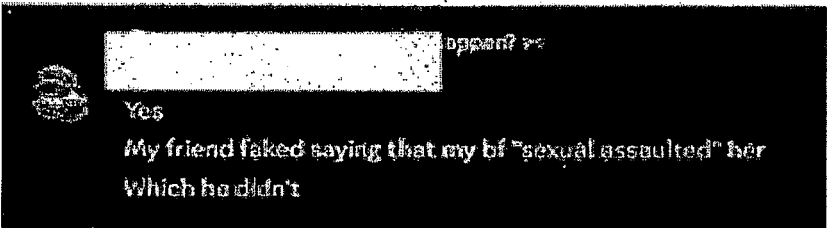
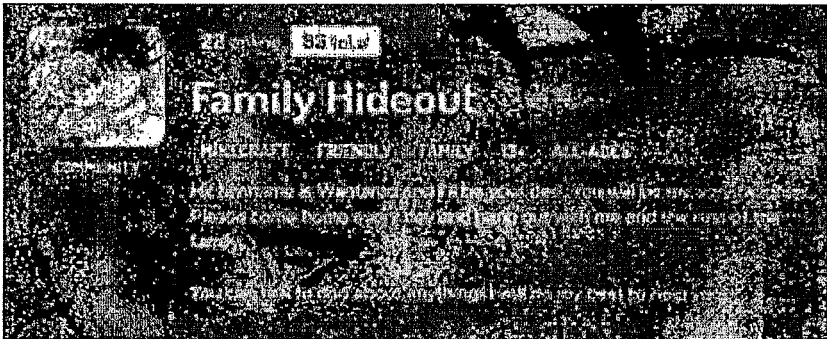


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57. Other Discord servers are only slightly less obvious. For example, a server called “Family Hideout” centered on an adult man who called himself “Dad” and built a “family” of children online.⁶⁷ In this server, which was labeled “Friendly,” “Family,” and “All-Ages,” the man developed relationships with children and encouraged them to take and share nude images.



Server identified by NCOSE in April 2023⁶⁸

⁶⁷ National Center on Sexual Exploitation, *Evidence of Exploitation Collected on Discord*, https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-2023DDL_Discord.pdf (last visited Jun. 12, 2026).

⁶⁸ National Center on Sexual Exploitation, *Evidence of Exploitation Collected on Discord*,

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58. Other servers are more discreet yet are still widely known as places where children are groomed. For instance, a server called “FurWaterSportsAndYiff” was described as “Full of minors, groom hub” by one disgusted reviewer of the server. According to the reviewer, this server was filled with minors and adults and was “[p]retty much pedophilia at its best.”⁶⁹



Server review identified by NCOSE in April 2023⁷⁰

59. As Discord expanded into one of the world’s largest communications platforms, the opportunities for predators to identify, contact, and exploit children expanded as well. Nevertheless, Defendant did nothing to meaningfully address these obvious and serious flaws in its design and safety systems.

60. Through numerous well-documented and publicized cases, Defendant has long known that Discord enables and facilitates the grooming, trafficking, and sexual abuse of minors. For example, in its June 2023 article, NBC News reviewed publicly available information since Discord was founded and identified 35 cases in the previous six years in which adults were prosecuted on charges of kidnapping, grooming, or sexual assault that involved communications

⁶⁹ National Center on Sexual Exploitation, *Evidence of Exploitation Collected on Discord*, https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-2023DDL_Discord.pdf (last visited Jun. 12, 2026).

⁷⁰ National Center on Sexual Exploitation, *Evidence of Exploitation Collected on Discord*, https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-2023DDL_Discord.pdf (last visited Jun. 12, 2026).

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on Discord.⁷¹ Because these cases were only those that were reported, investigated, and prosecuted during that time, “What we see is only the tip of the iceberg,” explained a child safety advocate.⁷²

61. Over the years, countless criminal cases have exposed the critical role that Defendant plays in enabling and facilitating grooming and other predatory conduct. In 2022, for instance, an Indiana man pled guilty to sexual exploitation of a minor and possession of CSAM after the FBI discovered that he had engaged in sexually explicit conversations with an 11-year-old girl on Discord and coerced the girl into sending sexually explicit images of herself.⁷³ The girl later told police that she communicated with the man via chats, video calls, and voice calls on Discord. Later that year, an Oregon man was federally charged with child exploitation crimes following an investigation that found he had “pretended to be an Oregon teenager to convince the child to engage in sexually explicit acts during a video chat on Discord.”⁷⁴

62. Similar cases were brought throughout 2023 and 2024. In March 2023, for example, a man was charged after he allegedly had a sexually explicit conversation with a 14-year-old girl and shared CSAM with her—all on Discord.⁷⁵ At the time, the man was a middle-school science teacher and had engaged in this conduct at the school where he was employed. And in 2024, a South Carolina man was sentenced to 20 years in federal prison after he pled guilty to numerous crimes he committed against children on Discord, including coercing minor girls into performing livestream sexual acts for him in a Discord call that he recorded.⁷⁶ The man also made repeated threats to the girls and their families, and one of the girls attempted suicide because of this abuse.

63. Discord has also been at the center of numerous cases involving the kidnapping and sexual assault of minors. For example, in 2021, a Virginia man was arrested and charged with sexually exploiting and kidnapping a 12-year-old girl from her home in California.⁷⁷ According to

⁷¹ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 12, 2026).

⁷² Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 11, 2026).

⁷³ Phyllis Cha, *Marion County corrections employee fired, arrested over sexually explicit images to girl*, IndyStar (Sept. 7, 2022), <https://www.indystar.com/story/news/crime/2022/09/07/corrections-officer-marion-county-employee-sexually-explicit-messages-to-child/65781240007/> (last visited Jun. 12, 2026).

⁷⁴ U.S. Dep’t of Justice, *Oregon Man Charged with Sexually Exploiting Minor on Discord, Additional Victims Sought* (Oct. 3, 2022), <https://www.justice.gov/usao-or/pr/oregon-man-charged-sexually-exploiting-minor-discord-additional-victims-sought> (last visited Jun. 12, 2026).

⁷⁵ *NJ Teacher Charged After “Sexually Explicit Conversation” With Teen*, New Jersey 101.5 (Mar. 3, 2023), <https://nj1015.com/nj-teacher-charged-after-sexually-explicit-conversation-with-teen/> (last visited Jun. 12, 2026).

⁷⁶ Alan Hovorka, *Lowcountry US Army member who groomed girls, recorded child porn on Discord sentenced to prison*, Post & Courier (Aug. 3, 2024), https://www.postandcourier.com/news/evan-bucci-child-porn-discord-grooming/article_09cf85ce-50dc-11ef-84b2-7b7358023542.html (last visited Jun. 12, 2026).

⁷⁷ Dan Morse, *With children stuck at home during coronavirus shutdowns, online sexual predators can swoop in*, Wash. Post (Feb. 12, 2023), <https://www.washingtonpost.com/local/public-safety/coronavirus-lockdown-child->

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court documents, the man met and groomed the girl on Discord, flew to California and picked her up at her house at 2:30 a.m., and was arrested at the Denver airport during a layover.

64. Similarly, in February 2023, a Michigan man was arrested and charged with kidnapping a 14-year-old Washington girl whom he had met and groomed on Discord.⁷⁸ The next month, a North Carolina man was arrested and charged with rape, child abduction, and human trafficking after police rescued a 13-year-old from a locked shed behind his house.⁷⁹ According to the girl's mother, the man had been communicating with her daughter for months on Discord before he abducted her from her home in Dallas.

65. The pattern continued in 2024. In February, a Texas man was charged with human trafficking and sexual assault of a 16-year-old girl whom he met and communicated with on Discord.⁸⁰ The girl told police that the man picked her up in Kansas and brought her to his apartment in Texas, where "they had sex multiple times." A few months later, a North Carolina man was charged with kidnapping and raping a 12-year-old girl he had met on Discord.⁸¹ Around the same time, a Pennsylvania man was arrested and charged with multiple offenses, including rape of a child and indecent assault of a person less than 13 years of age.⁸² The police investigation revealed that the man was communicating with the 12-year-old boy on Discord, which included sexual conversations and making plans to meet.

66. Despite Defendant's repeated assurances to parents that it has a "zero tolerance" policy for the criminal acts described above and that its product is built on safety, the rampant sexual exploitation of children on Discord has gotten only worse over the years—not better. John Shehan, the Senior Vice President of the National Center for Missing and Exploited Children ("NCMEC"), emphasized that his organization has seen "explosive growth" in CSAM and

exploitation/2021/02/04/90add6a6-462a-11eb-a277-49a6d1f9dff1_story.html (last visited Jun. 12, 2026).

⁷⁸ Ruth Bashinsky, *Washington State girl, 14, who went missing with "man she met on discord" near notorious sex trafficking corridor FOUND: Michigan man arrested over kidnapping*, Daily Mail (Feb. 1, 2024), <https://www.dailymail.co.uk/news/article-13034633/washington-state-girl-missing-discord-sex-trafficking-michigan.html> (last visited Jun. 12, 2026).

⁷⁹ Peter Charalambous & Alexandra Faul, *Missing 13-year-old rescued from locked North Carolina shed*, ABC News (Mar. 14, 2023), <https://abcnews.go.com/US/missing-13-year-rescued-locked-north-carolina-shed/story?id=97830147> (last visited Jun. 12, 2026).

⁸⁰ Britny Eubank, *Man and His Mother Charged After Missing Kansas Teen Found Safe in Central Texas*, KVUEabc (Feb. 8, 2024), <https://www.kvue.com/article/news/crime/austin-human-trafficking-sexual-assault-missing-kansas-teen/269-361c25e3-12a8-4ec4-8779-0f962c12e8d1> (last visited Jun. 12, 2026).

⁸¹ "Under 13 Is under 13": Judge responds to attorney's claim that man charged with kidnapping & rape believed 12-year-old girl was college student, WRAL News (Apr. 16, 2024), <https://www.wral.com/archive/21381250/> (last visited Jun. 12, 2026).

⁸² Keith Heffinrayer, *Four men arrested following investigation into sexual abuse of 12-year-old boy in Upper Gwynedd*, NorthPennNow (Apr. 15, 2024), <https://northpennnow.com/news/public-safety/four-men-arrested-following-investigation-into-sexual-abuse-of-12-year-old-boy-in-upper-gwynedd-police-say/> (last visited Jun. 12, 2026).

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exploitation on Discord.⁸³ “There is a child exploitation issue on the platform. That’s undeniable,” he stated.⁸⁴

67. Independent child-safety organizations reached the same conclusion. For five consecutive years, NCOSE has named Discord to its “Dirty Dozen” list because of continuing failures to address sexually exploitative content and activity on the platform.⁸⁵ As NCOSE put it, “*by its very design* Discord allows high-risk on-ramps for exploitation and policy enforcement is often reactive and lax.”⁸⁶ Indeed, NCOSE noted that, “Discord is *SUCH a reliable platform for abusers* that organized sextortion criminal networks like 764 have been documented to use Discord to share tactics, recruit victims, and coordinate sextortion at a larger scale.”⁸⁷

68. Defendant’s own “transparency reports” reflect that the criminal conduct that it enables on Discord has only become more pervasive. For example, Defendant reported receiving 416,036 reports from users regarding “Child Safety” issues, which includes CSAM, during the fourth quarter of 2023 alone.⁸⁸ By the next quarter, that number had grown to 1,035,166—a roughly 150% increase.⁸⁹ And Defendant’s 2026 Transparency Report, which covers March 2025 through March 2026, revealed that it received 1,690,866 reports regarding “Child Safety: Child Sexualization Content” and 1,486,036 reports regarding “Child Safety: Inappropriate Contact with Minor,” for a combined total of over 3.1 million reports pertaining to Child Safety.⁹⁰

D. Defendant knowingly enables the sexual exploitation of children through its design choices and business practices.

69. Discord is overrun with harmful content and predators because Defendant prioritizes growth, user engagement, revenue, and ultimately profits over child safety. For years, Defendant

⁸³ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 12, 2026).

⁸⁴ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 12, 2026).

⁸⁵ National Center on Sexual Exploitation, *The 2026 Dirty Dozen List*, https://endsexualexploitation.org/dirty-dozen-list-2026/?gad_source=1&gad_campaignid=22491414705; see also *Discord, From Gaming Chat to Grooming Pipeline*, <https://endsexualexploitation.org/discord/> (last visited Jun. 12, 2026).

⁸⁶ National Center on Sexual Exploitation, *Discord, From Gaming Chat to Grooming Pipeline*, <https://endsexualexploitation.org/discord/> (last visited Jun. 12, 2026) (emphasis added).

⁸⁷ National Center on Sexual Exploitation, *Discord, From Gaming Chat to Grooming Pipeline*, <https://endsexualexploitation.org/discord/> (last visited Jun. 12, 2026) (emphasis added).

⁸⁸ Discord, *Discord Transparency Report: October-December 2023*, https://assets-global.website-files.com/625fe439fb70a9d901e138ab/65a6f7546529c359e68bd2ce_O4_2023_Discord_Transparency_Report_October_-_December_2023.pdf (last visited Jun. 12, 2026).

⁸⁹ Discord, *Discord Transparency Report: January – June 2024*, https://cdn.prod.website-files.com/625fe439fb70a9d901e138ab/67056a054d453d30491c1ac9_Discord%20Jan_Jun%202024%20Transparency%20Report.pdf (last visited Jun. 11, 2026).

⁹⁰ Discord, *Discord Transparency Report: March 2025 – March 2026*, <https://cdn.discordapp.com/assets/transparency-reports/Discord-Transparency-Report-2026.pdf> (last visited Jun. 11, 2026).

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has knowingly prioritized growth, engagement, and profit over the safety of children through the actions it has taken and decisions it has made to increase and monetize users on Discord regardless of the consequences.

1. Defendant prioritizes growth, user engagement, and profits over the safety of children.

70. Although Discord began as a communications app for gamers, its co-founders Jason Citron and Stanislav Vishnevskiy soon realized that Discord appealed to a much broader audience and sought to expand its user base. “We saw an opportunity to make communications easier for everyone, not just gamers,” Citron explained.⁹¹ So the company changed its motto from “Chat for gamers” to “A new way to chat with your communities and friends” and became hyper-focused on transforming into a universal communication product.⁹²

71. Discord has since grown exponentially. In 2019, the company had 56 million monthly active users.⁹³ But with Discord’s shift away from gaming in 2020, combined with its pandemic-driven explosion in popularity among young users, Defendant grew its monthly active users to 150 million by 2022.⁹⁴ Today, Discord boasts over 200 million monthly active users.⁹⁵ On peak days, more than 60 million users actively join servers to chat, attend live events, collaborate on projects, or support brands, making Discord one of the most used real-time communication platforms online.⁹⁶

72. As Discord has grown, private investors have poured money into the company. In June 2020, Defendant raised \$100 million at a \$3.4 billion valuation.⁹⁷ Just five months later, Defendant raised another \$100 million at more than double the valuation (\$6.90 billion).⁹⁸ In early 2021, Defendant rebuffed an acquisition offer from Microsoft of at least \$10 billion.⁹⁹ Later that

⁹¹ Nathan Latka, *Discord’s \$879M Revenue: 25 Moves to \$25B Valuation*, LATKA-B2B Saas Blog (Jan. 15, 2025), <https://blog.getlatka.com/discord-revenue/> (last visited Jun. 11, 2026).

⁹² Kellen Browning, *How Discord, Born from an Obscure Game, Became a Social Hub for Young People*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html> (last visited Jun. 12, 2026).

⁹³ HelpLama, *Discord Revenue and Usage Statistics 2026*, <https://helplama.com/discord-statistics/> (last updated Jun. 2026) (last visited Jun. 12, 2026).

⁹⁴ HelpLama, *Discord Revenue and Usage Statistics 2026*, <https://helplama.com/discord-statistics/> (last updated Jun. 2026) (last visited Jun. 12, 2026).

⁹⁵ HelpLama, *Discord Revenue and Usage Statistics 2026*, <https://helplama.com/discord-statistics/> (last updated Jun. 2026) (last visited Jun. 12, 2026).

⁹⁶ Riten Debnath, *Discord in 2026: Usage, Revenue, Valuation & Growth Statistics*, Fueler (Oct. 18, 2025), <https://fueler.io/blog/discord-usage-revenue-valuation-growth-statistics> (last visited Jun. 12, 2026).

⁹⁷ Equitybee, Inc., *Discord Funding History*, <https://equitybee.com/companies/company?company=discord> (last visited Jun. 12, 2026).

⁹⁸ Equitybee, Inc., *Discord Funding History*, <https://equitybee.com/companies/company?company=discord> (last visited Jun. 12, 2026).

⁹⁹ Sarah E. Needleman, *Discord Ends Deal Talks with Microsoft*, Wall. St. J. (Apr. 20, 2021), <https://www.wsj.com/articles/discord-ends-deal-talks-with-microsoft-11618938806> (last visited Jun. 12, 2026).

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year, it raised another \$500 million at a staggering valuation of \$14.5 billion.¹⁰⁰ While Defendant has remained privately held so far, the company is actively preparing to go public.¹⁰¹

73. A primary reason for investors’ interest in Discord is its user growth, putting enormous pressure on the company to prioritize user growth and engagement above all else. Growing Discord’s users is critical to Defendant’s revenue and future profitability. Defendant generates most of its revenue from its subscription service called Nitro, which provides users with benefits such as custom emojis, unlimited “super reactions,” and HD video streaming. As the company expanded its user base, its revenue skyrocketed from \$150 million in 2020 to over \$600 million in 2024.¹⁰²

74. While for years Defendant shunned advertising on Discord, in 2024 the company started selling advertisements to boost revenue by capitalizing on its massive and growing user base.¹⁰³

75. Defendant’s growth strategy has focused on a user-centric approach that prioritizes user preferences over child safety. As Defendant CEO and co-founder Jason Citron put it, “We focus on what our users love, and that drives everything we do.”¹⁰⁴ In practice, that has resulted in Defendant choosing to value user “privacy” over protecting children in order to attract as many users to Discord as possible. For example, Defendant continues to allow people to chat using fake names and does not require individuals to enter their real names when registering for an account, ensuring that predators will continue to flock to Discord because they can remain anonymous. Defendant could require age verification and default safety features to the highest possible setting for all users but it does not. In fact, despite promising a global rollout of “teen-by-default” safety settings that would give all users age-appropriate protections and limit access to risky spaces, Defendant postponed this launch.¹⁰⁵

¹⁰⁰ Equitybee, Inc., *Discord Funding History*, <https://equitybee.com/companies/company?company=discord> (last visited Jun. 12, 2026).

¹⁰¹ Jake Safane, *Discord Upcoming IPO: Gaming Up a Public Market Debut*, Forge (Jan. 28, 2026) <https://forgeglobal.com/insights/discord-upcoming-ipo-news/> (last visited Jun. 12, 2026).

¹⁰² Salvatore Rodriguez & Sarah E. Needleman, *Discord to Start Showing Ads for Gamers to Boost Revenue*, Wall St. J. (Mar. 30, 2024), <https://www.wsj.com/tech/discord-to-start-showing-ads-for-gamers-to-boost-revenue-bf5848b9> (last visited Jun. 12, 2026). Depending on the tracking agency, Defendant’s revenue in 2024 reached as high as \$1.3 billion. Riten Debnath, *Discord in 2026: Usage, Revenue, Valuation & Growth Statistics*, Fueler (Oct. 18, 2025), <https://fueler.io/blog/discord-usage-revenue-valuation-growth-statistics> (last visited Jun. 12, 2026).

¹⁰³ Salvatore Rodriguez & Sarah E. Needleman, *Discord to Start Showing Ads for Gamers to Boost Revenue*, Wall St. J. (Mar. 30, 2024), <https://www.wsj.com/tech/discord-to-start-showing-ads-for-gamers-to-boost-revenue-bf5848b9> (last visited Jun. 12, 2026).

¹⁰⁴ Nathan Latka, *Discord’s \$879M Revenue: 25 Moves to \$15B Valuation*, LATKA-B2B SaaS Blog (Jan. 15, 2025), <https://blog.getlatka.com/discord-revenue/> (last visited Jun. 12, 2026).

¹⁰⁵ National Center on Sexual Exploitation, *The 2026 Dirty Dozen List*, https://endsexualexploitation.org/dirty-dozen-list-2026/?gad_source=1&gad_campaignid=22491414705; see also *Discord, From Gaming Chat to Grooming Pipeline*, <https://endsexualexploitation.org/discord/> (last visited Jun. 12, 2026); see also *Discord, Discord Launches*

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76. The features added by Defendant to supposedly allow parents to monitor their children's Discord use have only highlighted that Defendant prioritizes user privacy over child safety. In 2023, Defendant created its "Family Center for Parents and Guardians," which Defendant itself states is a "completely opt-in feature and not mandatory for teens."¹⁰⁶ While this feature permits parents to monitor some of their children's activity on Discord, it prohibits parents from accessing the most important information on their accounts: the contents of their messages. As Defendant tells children, "We value your privacy which is why connected accounts will not have access to the contents of your messages."¹⁰⁷ Defendant also assures children that, with Family Center, "you have control over whether or not you use this feature, how long you want to use it for, and who you connect your account to."¹⁰⁸ *By putting children in charge of this parental feature, Defendant seeks to preserve growth of this key demographic.*

77. In pursuit of growth, Defendant has also chosen not to implement readily available measures that would protect children but stunt user growth, such as age verification to ensure that children under 13 cannot create accounts and that adults cannot misrepresent their age to children.

78. Defendant has also fought attempts to be held publicly accountable for the sexual exploitation of children that its app enables. In November 2023, Defendant's CEO and co-founder Jason Citron refused to accept service of a subpoena to testify before the U.S. Senate as part of its hearing on "Big Tech and the Online Child Sexual Exploitation Crisis."¹⁰⁹ Citron appeared at the hearing only after the Senate was forced to enlist the U.S. Marshals Service to personally subpoena him—a situation the Senate called "a remarkable departure from typical practice."¹¹⁰

79. The National Center for Missing and Exploited Children ("NCMEC"), to which internet companies are by law required to report instances of child sex abuse, also highlighted issues working with Defendant and had to rescind an invitation to become part of its Cybertipline Roundtable when the company failed to "identify a senior child safety representative to attend."¹¹¹

Teen Default Experience Globally, (updated Feb. 9, 2026), <https://discord.com/press-releases/discord-launches-teen-by-default-settings-globally> (last visited Jun. 11, 2026).

¹⁰⁶ Buffy, *What Is Family Center?*, Discord, <https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=We%20value%20your%20privacy> (last visited Jun. 12, 2026).

¹⁰⁷ Buffy, *What Is Family Center?*, Discord, <https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=We%20value%20your%20privacy> (last visited Jun. 12, 2026).

¹⁰⁸ Buffy, *What Is Family Center?*, Discord, <https://support.discord.com/hc/en-us/articles/14155039712407-What-is-Family-Center#:~:text=We%20value%20your%20privacy> (last visited Jun. 12, 2026).

¹⁰⁹ CBS/AP, *Senate Panel Forced to Use U.S. Marshals to Subpoena CEOs of X and Discord to Testify on Protecting Kids Online*, CBS News (Nov. 21, 2023), <https://www.cbsnews.com/news/senate-panel-us-marshals-subpoenas-ceos-x-discord/> (last visited Jun. 11, 2026).

¹¹⁰ CBS/AP, *Senate Panel Forced to Use U.S. Marshals to Subpoena CEOs of X and Discord to Testify on Protecting Kids Online*, CBS News (Nov. 21, 2023), <https://www.cbsnews.com/news/senate-panel-us-marshals-subpoenas-ceos-x-discord/> (last visited Jun. 12, 2026).

¹¹¹ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC

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According to John Shehan, NCMEC's Senior Vice President, "[i]t was really questionable, their commitment to what they're doing on the child exploitation front."¹¹²

80. Similar concerns have been raised by the National Center on Sexual Exploitation ("NCOSE"). In April 2024, NCOSE notified Defendant's CEO and co-founder, Jason Citron, that Discord would remain on its annual "Dirty Dozen List" for the fourth consecutive year.¹¹³ In doing so, NCOSE advised that it had "presented Discord with extensive evidence of exploitation yearly since 2021" and criticized Defendant for failing to implement or effectively enforce safety measures that Defendant had publicly touted as protections for minors.¹¹⁴ Among other things, NCOSE reported that its testing showed that minor-aged accounts could still access age-restricted content and communities, receive direct communications from adults, and locate sexually explicit content through Discord despite Defendant's public representations regarding child safety and age-based protections.¹¹⁵ As NCOSE aptly stated, "The disparity between what Discord says they are doing – even when under oath – and what Discord is NOT doing presents serious negative evidence against the repeated public commitments to proactively improve the safety and wellbeing of Discord users, especially those aged 13-17."¹¹⁶

81. The warnings provided by NCOSE were reinforced by federal law enforcement investigations into organized child-exploitation networks operating on Discord, including a violent extremist and child-exploitation network that originated in a Discord community titled "764" and ultimately became a global movement for predators.

82. In November 2024, a member of 764 was sentenced to thirty years in federal prison for sexually exploiting a child and for his role in creating communities on Discord that recruited and coerced children into recording themselves engaging in self-harm, sexually explicit acts, and

News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 12, 2026).

¹¹² Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 12, 2026).

¹¹³ Letter from Dawn Hawkins, NCOSE CEO, and Kindsey P. Chadwick, NCOSE Interim President, to Jason Citron, Discord CEO and Co-Founder, (April 3, 2024) (available at https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2024_FINAL.pdf) (last visited Jun. 12, 2026).

¹¹⁴ Letter from Dawn Hawkins, NCOSE CEO, and Kindsey P. Chadwick, NCOSE Interim President, to Jason Citron, Discord CEO and Co-Founder, (April 3, 2024) (available at https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2024_FINAL.pdf) (last visited Jun. 12, 2026).

¹¹⁵ Letter from Dawn Hawkins, NCOSE CEO, and Kindsey P. Chadwick, NCOSE Interim President, to Jason Citron, Discord CEO and Co-Founder, (April 3, 2024) (available at https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2024_FINAL.pdf) (last visited Jun. 12, 2026).

¹¹⁶ Letter from Dawn Hawkins, NCOSE CEO, and Kindsey P. Chadwick, NCOSE Interim President, to Jason Citron, Discord CEO and Co-Founder, (April 3, 2024) (available at https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2024_FINAL.pdf) (last visited Jun. 12, 2026).

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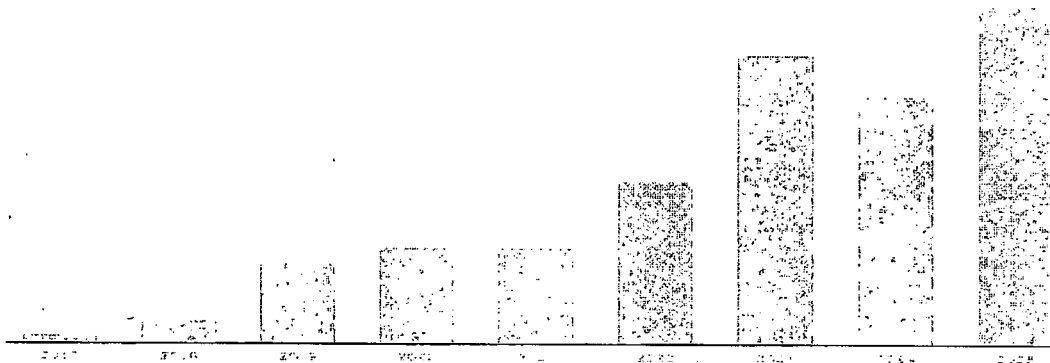
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violence.¹¹⁷ According to then-FBI Director Christopher Wray, the “defendant orchestrated a community to target children through online gaming sites and used extortion and blackmail to force his minor victims to record themselves committing acts of self-harm and violence.”¹¹⁸ The defendant boosted membership in these communities by advertising livestreams of children engaging in self-mutilation (“cutshows”) and sexually explicit activity “on cam.”¹¹⁹ The evidence also showed that the defendant used Nitro, a form of Discord’s currency, to pay another Discord user to help obtain sexually explicit images from a minor after she initially refused his requests.¹²⁰

83. In May 2025, the Federal Bureau of Investigation launched an investigation into the 764 terror network. FBI Assistant Director David Scott described the international criminal enterprise as “one of the most disturbing things we’re seeing.”¹²¹ The FBI has opened 250 investigations tied to that network alone.¹²²

Federal cases mentioning Discord over time

Since the communication platform’s launch in 2015, Discord has been mentioned in around 655 federal cases in the United States.



Data as of November 2025¹²³

¹¹⁷ U.S. Dep’t of Justice, *Member Of Violent 764 Terror Network Sentenced to 30 Years in Prison For Sexually Exploiting a Child*, (Nov. 7, 2024), <https://www.justice.gov/archives/opa/pr/member-violent-764-terror-network-sentenced-30-years-prison-sexually-exploiting-child> (last visited Jul. 21, 2026).

¹¹⁸ U.S. Dep’t of Justice, *Member Of Violent 764 Terror Network Sentenced to 30 Years in Prison For Sexually Exploiting a Child*, (Nov. 7, 2024), <https://www.justice.gov/archives/opa/pr/member-violent-764-terror-network-sentenced-30-years-prison-sexually-exploiting-child> (last visited Jul. 21, 2026).

¹¹⁹ U.S. Dep’t of Justice, *Member Of Violent 764 Terror Network Sentenced to 30 Years in Prison For Sexually Exploiting a Child*, (Nov. 7, 2024), <https://www.justice.gov/archives/opa/pr/member-violent-764-terror-network-sentenced-30-years-prison-sexually-exploiting-child> (last visited Jul. 21, 2026).

¹²⁰ U.S. Dep’t of Justice, *Member Of Violent 764 Terror Network Sentenced to 30 Years in Prison For Sexually Exploiting a Child*, (Nov. 7, 2024), <https://www.justice.gov/archives/opa/pr/member-violent-764-terror-network-sentenced-30-years-prison-sexually-exploiting-child> (last visited Jul. 21, 2026).

¹²¹ ABC News, *FBI has opened 250 investigations tied to violent online network ‘764’ that preys on teens, top officials say*, (May 6, 2025) <https://abcnews.com/US/fbi-opened-250-investigations-tied-violent-online-network/story?id=121480884> (last visited Jun. 12, 2026).

¹²² ABC News, *FBI has opened 250 investigations tied to violent online network ‘764’ that preys on teens, top officials say*, (May 6, 2025) <https://abcnews.com/US/fbi-opened-250-investigations-tied-violent-online-network/story?id=121480884> (last visited Jun. 12, 2026).

¹²³ Josh Cardinale, *Blind spot allows Discord users to hide evidence from law enforcement*, KCRA 3 (Dec. 2, 2025), <https://www.kcra.com/article/blind-spot-discord-hide-evidence-law-enforcement/69531739> (last visited Jun. 12, 2026).

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84. As evidence of Discord's role in facilitating child exploitation continued to mount, multiple state attorneys general responded with their own investigations and enforcement actions. In April 2025, the New Jersey Attorney General sued Defendant for misleading parents about the efficacy of its safety features, failing to enforce minimum age requirements, and exposing minors to sexual predators in violation of the New Jersey Consumer Fraud Act.¹²⁴ In May 2026, the Nevada Attorney General sued Defendant, finding that its lack of age verification, hands-off approach to moderation, and refusal to limit interactions between children and adult strangers had made Discord "the go-to chat option for child abusers."¹²⁵ That same month, the Indiana Attorney General sued Defendant following the death of a 17-year-old who was lured to her death by a predator after extensive on-platform communication, stating that Discord and similar platforms "know full well that numerous predatory sex criminals have used these platforms to contact and lure their victims. And yet, they continue promoting themselves as safe for children."¹²⁶ The Florida Attorney General opened a formal investigation into Discord that same year, stating that "many of our criminal investigations into internet child predators lead to one place: Discord."¹²⁷ And in May 2026, the Texas Attorney General sued Defendant for allowing child predators to groom and exploit kids while deceiving consumers, parents, and the public about the safety of Discord.¹²⁸

85. These enforcement actions are not isolated. They reflect a consistent finding by multiple sovereigns: Defendant knows children are being harmed on its platform and has perpetuated the business and design choices that make that harm possible, without any meaningful change and while continuing to tout its safety bona fides to the public.

¹²⁴ State of New Jersey, *AG Platkin Sues Messaging App "Discord" for Unlawful Practices That Expose NJ Kids to Child Predators and Violent, Sexual Content*, <https://www.njoag.gov/ag-platkin-sues-messaging-app-discord-for-unlawful-practices-that-expose-nj-kids-to-child-predators-and-violent-sexual-content/> (last visited Jun. 12, 2026).

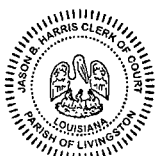
¹²⁵ State of Nevada, *Attorney General Ford Sues Online Platform Discord for Failing to Protect Nevada Children*, https://ag.nv.gov/News/PR/2026/Attorney_General_Ford%C2%A0Sues%C2%A0Online_Platform%C2%A0Discord_for_Failing_to%C2%A0Protect_Nevada_Children/ (last visited Jun. 12, 2026).

¹²⁶ State of Indiana, *To protect Hoosier children from online predators, Attorney General Todd Rokita sues Roblox Corp. and Discord Inc.*, <https://events.in.gov/event/to-protect-hoosier-children-from-online-predators-attorney-general-todd-rokita-sues-roblox-corp-and-discord-inc> (last visited Jun. 12, 2026).

¹²⁷ State of Florida, *Attorney General James Uthmeier Launches Investigation Into Discord Over Child Safety Concerns*, <https://www.myfloridalegal.com/newsrelease/attorney-general-james-uthmeier-launches-investigation-discord-over-child-safety> (last visited Jun. 12, 2026).

¹²⁸ State of Texas, *Attorney General Ken Paxton Files Landmark Lawsuit Against Discord for Deceiving Parents and Exposing Texas Children to Predators*, <https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxton-files-landmark-lawsuit-against-discord-deceiving-parents-and-exposing> (last visited Jun. 12, 2026).

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2. Defendant enables child sexual exploitation through the design of Discord, inadequate safety features, and refusal to invest in basic safety protections.

86. Defendant's pursuit of growth over child safety is reflected in numerous actions it took and decisions it made related to the design and safety of its app. Had Defendant acted differently, the harm suffered by countless children would not have occurred.

87. Defendant deliberately designed Discord to minimize barriers to communication between users, including adults and children, creating an environment in which predators could readily identify, contact, groom, and exploit minors. Despite repeatedly assuring parents that Discord "defaults" to safety, Defendant designed those default settings to facilitate—not restrict—private communications between adults and child users.

88. For example, Defendant maintains default settings that allow predators to send direct messages to children, either by joining Discord servers frequented by children or by sending friend requests to child users.

89. Predators often identify and target children by joining servers that are populated with kids. By default, Discord allows any two people who share a server to direct message each other, providing predators with an easy means of contacting and communicating with children. In other words, a predator need only join a community server, which could contain over a million users, to exchange DMs with an unsuspecting child user. Numerous Discord servers for games or pop-culture hobbies popular with children—such as Fortnite,¹²⁹ Roblox,¹³⁰ or My Little Pony¹³¹—have tens of thousands or even over a million members, including adults.

90. Predators also often initiate contact with children by adding a child as a "friend" on Discord so they can direct message them. By default, Discord permits children to receive friend requests from "Everyone," meaning children can receive and accept friend requests from individuals whom they do not know and with whom they have no connection.

91. For years, Discord also defaulted to settings that enabled predators to send children sexually explicit images via direct messages. In 2017, Defendant introduced "Safe Direct Messaging." This feature contained three options, including "Keep me safe," which supposedly would automatically scan and delete messages that a child received containing explicit content.

¹²⁹ Official Fortnite, Discord, <https://discord.com/servers/official-fortnite-322850917248663552> (last visited Jun. 12, 2026).

¹³⁰ Discord, *Roblox (Unofficial)*, <https://discord.com/servers/roblox-150074202727251969> (last visited Jun. 12, 2026).

¹³¹ Discord, *MLP General*, <https://discord.com/servers/mlp-general-950868552762671134> (last visited Jun. 12, 2026).

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The process is pretty simple. Safe Direct Messaging has three settings:

The differences are pretty simple:

Keep me safe: The safest option. This will have Discord scan any image sent in all DMs, regardless of whether you've added the user on your friend list, or the user is DMing you just by sharing a mutual server.

My friends are nice: The medium-est option! This will let Discord know to scan any images sent in DMs from users that aren't on your friends list, but also to trust your previously-added friends and not worry about any images they send.

Do not scan: The self-confident option. Enabling this option will completely disable Discord's image scanning process, and leave you for a walk on the wild side for any and all DMs you receive. Careful, it's a jungle out there!

*Defendant's description of the categories of Discord's Safe Direct Messaging feature*¹³²

92. Consistent with Defendant's "default to safety" promise, the company long represented that the "Keep me safe" option was on by default. But in fact, Discord defaulted not to this most restrictive setting but to the lower setting of "My friends are nice," which meant that Discord would not scan any images from a child's "friend"—which could be anyone.

93. Defendant later changed the labels of this feature from "Keep me safe" to "Filter all direct messages" and from "My friends are nice" to "Filter direct messages from non-friends."¹³³ But it continued to default to the less restrictive setting:

¹³² Discord, *Discord Safety: Safe Messaging!*, <https://web.archive.org/web/20210203000438/https://support.discord.com/hc/en-us/articles/115000068672-Discord-Safety-Safe-Messaging-> (archived Feb. 3, 2021) (last visited Jun. 12, 2026).

¹³³ Discord, *Helping Your Teen Stay Safe on Discord*, <https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023) (last visited Jun. 12, 2026).

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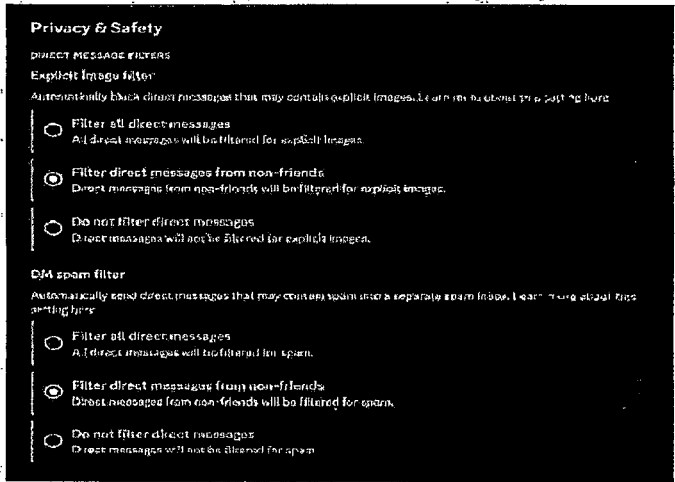
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DM spam filter

Automatically send direct messages that may contain spam into a separate spam inbox.



These filters are customizable and you can choose to turn them off. By default, these filters are set to “Filter direct messages from non-friends.” Choose “Filter all direct messages” if you want all direct messages that you receive to be filtered, or select “Do not filter direct messages” to turn these filters off. *Screenshot of Defendant’s Helping Your Teen Stay Safe on Discord Webpage from 2023*¹³⁴

94. Again, by default, Defendant allows users to receive direct messages from “friends” and anyone with whom they share a server.¹³⁵ But limiting DMs in this way offers little protection for children. Children can receive and accept friend requests from users they do not know and with whom they have no connection and then engage privately on Discord without any oversight or explicit content guardrails—all by design. In other words, through Defendant’s default settings and design choices, adults can obtain direct, private access to child users on Discord with only minimal effort and with no meaningful repercussions.

95. Although parents can change Discord’s permissive default settings to more restrictive ones, that option is meaningless because *Defendant enables children to modify these safety settings without parental approval*. So, a parent might modify the default settings so that their child cannot exchange direct messages with other server members or cannot receive friend requests from “Everyone,” only to have their child simply change those settings to allow these unfettered interactions. As Defendant puts it, “[o]ur product architecture provides each user with fundamental control over their experience on Discord including who they communicate with, what content they see, and what communities they join or create.”¹³⁶ By doing so, Defendant strips parents of basic protective options that would prevent adult strangers from targeting and exploiting their children.

¹³⁴ Discord, *Helping Your Teen Stay Safe on Discord*, <https://web.archive.org/web/20230711200552/https://discord.com/safety/360044153831-helping-your-teen-stay-safe-on-discord> (archived July 11, 2023) (last visited Jun. 12, 2026).
¹³⁵ Discord, *Four Steps to a Super Safe Account*, <https://discord.com/safety/360043857751-four-steps-to-a-super-safe-account> (last visited Jun. 12, 2026).
¹³⁶ Discord, *Discord Parent Hub*, <https://discord.com/safety-parents> (last visited Jun. 12, 2026).

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As one parent explained in calling Discord an “EXTREMELY dangerous app,” Defendant does not provide “any way for parents to set settings that can’t simply be undone by kids.”¹³⁷ Simply put, *Defendant says parents can protect children, but then ultimately leaves critical settings under the control of the child user.*

96. Defendant also refused to implement other simple measures that would have protected children using its product. For example, despite having the ability to do so, Defendant does not require users to verify their age and identity when creating an account. Doing so would have prevented predators from creating fake profiles and pretending to be children, which is their preferred approach in targeting children and convincing them to share sexually explicit images. Defendant also chose not to implement basic screening measures before allowing users on the app, which would have ensured that known predators are not permitted on the app.

97. Age and identity verification would also have prevented individuals under 13 from creating accounts on Discord. In many of the criminal cases involving the sexual exploitation of children on Discord, the children were under the age of 13. By requiring ID verification during the account sign-up process—a practice that other online products employ—Discord could have easily prevented these children from even using its app. But it chose not to, despite knowing for years that children under 13 operate freely on its environment and are targeted by predators.¹³⁸

98. Defendant also could have placed a higher age rating on its application in the iOS App Store and other app stores to signal to parents that Discord presented risks for children. Defendant likewise could have provided clear warnings to parents about the presence of sexual predators on Discord, so that parents could make an informed decision about allowing their child on Discord and/or educate their child on how to stay safe on the platform. Defendant could also have provided clear warnings to children about the presence of sexual predators on Discord and instructed children on how to stay safe on the platform. Defendant has done none of these things, while continuing to misrepresent that it is a safe platform for children.

99. Child-safety advocates have also criticized Defendant’s failure to use available technological tools to protect users on Discord. As the National Center on Sexual Exploitation observed, “[w]hile the platform has the advanced technology necessary to proactively monitor,

¹³⁷ Protect Children, *Tech Platforms Used By Online Child Sexual Abuse Offenders* (Feb. 2024), <https://www.suojellaanlapsia.fi/en/post/tech-platforms-child-sexual-abuse> (last visited Jun. 12, 2026).

¹³⁸ Letter from Dawn Hawkins, NCOSE CEO, and Kindsey P. Chadwick, NCOSE Interim President, to Jason Citron, Discord CEO and Co-Founder, (April 3, 2024) (available at https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2024_FINAL.pdf) (last visited Jun. 12, 2026).

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moderate, and report offending users and servers, Discord repeatedly chooses to use this technology for areas of significantly lesser importance – like watching soccer.”¹³⁹

100. Despite these glaring failures, Defendant constantly promotes its technology-focused “safety solutions” including its “AI-powered moderation systems.”¹⁴⁰ But this technology has proven grossly inadequate and insufficient to protect children from sexual exploitation. For instance, Defendant’s Teen Safety Assist feature, which it introduced in October 2023, is supposed to “automatically blur media that may be sensitive in direct messages and group direct messages with friends, as well as in servers,” and send “safety alerts” to teen users when they receive a direct message from a user for the first time.¹⁴¹ Yet this feature is “defective,” according to the NCOSE and other child safety experts.¹⁴² As part of its annual investigation into Discord, *“NCOSE researchers were able to send sexually explicit content from an adult account to an unconnected 13-year-old account, and no warning or resources were displayed.”*¹⁴³

101. Defendant repeatedly promised parents safety while simultaneously making deliberate design choices that rendered those promises utterly meaningless. As a result of Defendant’s decisions, thousands of Louisiana users were misled into signing up, believing Discord was safe for children, when it was really anything but.

102. Defendant is also famously slow and ineffective at responding to child-safety issues. One mother, for example, told CNN that Defendant essentially refused to help her after she reported that a man had communicated with her 10-year-old daughter and sent her links to pornography.¹⁴⁴ Following the mother’s report, Defendant sent her an automated message asking for “the message links to the reported content for the team to review and take appropriate action.”¹⁴⁵ After the mother sent the requested links, Defendant never responded. “There was no

¹³⁹ National Center on Sexual Exploitation, *Evidence of Exploitation Collected on Discord*, https://endsexualexploitation.org/wp-content/uploads/July-23_Proof-Section-Compilation_-2023DDL_Discord.pdf (last visited Jun. 11, 2026).

¹⁴⁰ *Discord’s Commitment to Teen and Child Safety*, Discord (July 11, 2023), <https://discord.com/safety/commitment-to-teen-child-safety> (last visited Jun. 12, 2026).

¹⁴¹ Savannah Badalich, *Building a Safer Place for Teens to Hang Out*, Discord (Oct. 24, 2023), <https://discord.com/safety/safer-place-for-teens> (last visited Jun. 11, 2026).

¹⁴² National Center on Sexual Exploitation, *Why Discord is On the Dirty Dozen List 4 Years in a Row*, <https://endsexualexploitation.org/articles/why-discord-is-on-the-dirty-dozen-list-4-years-in-a-row/> (last visited Jun. 12, 2026).

¹⁴³ National Center on Sexual Exploitation, *Why Discord is On the Dirty Dozen List 4 Years in a Row*, <https://endsexualexploitation.org/articles/why-discord-is-on-the-dirty-dozen-list-4-years-in-a-row/> (last visited Jun. 12, 2026) (emphasis in original).

¹⁴⁴ Samantha Murphy Kelly, *The Dark Side of Discord for Teens*, CNN Business (Mar. 22, 2022), <https://www.cnn.com/2022/03/22/tech/discord-teens/index.html> (last visited Jun. 12, 2026).

¹⁴⁵ Samantha Murphy Kelly, *The Dark Side of Discord for Teens*, CNN Business (Mar. 22, 2022), <https://www.cnn.com/2022/03/22/tech/discord-teens/index.html> (last visited Jun. 12, 2026).

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help at all,” she said.¹⁴⁶

103. The experience reported by CNN is consistent with NCOSE’s criticism of Defendant’s “notoriously slow” response to CSAM reports, “whether by users, government agencies, or law enforcement.”¹⁴⁷ And the National Center for Missing and Exploited Children (NCMEC) reported to Defendant that NCOSE identified it as “is one of the slowest corporations to remove or respond to CSAM.”¹⁴⁸

104. Other child protection groups have also repeatedly highlighted flaws in Defendant’s approach to child safety. For example, Denton Howard, executive director of Inhope, an organization of missing and exploited children hotlines from around the world, has flagged numerous problems with Defendant’s approach to child safety, including “slow response times to reports, communications issues when [child protection] hotlines tried to reach out, hotlines receiving account warnings when they try to report CSAM, the continued hosting of communities that trade and create CSAM, and evidence disappearing before hearing back from Discord.”¹⁴⁹

105. Even after Defendant publicly represented to lawmakers and the public that features such as Teen Safety Assist helped protect minors, NCOSE conducted testing using minor-aged accounts in 2024 that called into question Defendant’s safety representations. NCOSE reported that adult users could still send sexually explicit images to minor accounts, that sexually explicit imagery was not automatically blurred, that warning messages did not appear when adults contacted minors, and that minor-aged accounts could locate sexually explicit content and communities through ordinary searches.¹⁵⁰ NCOSE communicated these findings directly to Defendant and advised that it had been providing Defendant with evidence of exploitation on the platform since 2021, making clear that the problems on Discord were neither new nor unknown to Defendant.¹⁵¹

¹⁴⁶ Samantha Murphy Kelly, *The Dark Side of Discord for Teens*, CNN Business (Mar. 22, 2022), <https://www.cnn.com/2022/03/22/tech/discord-teens/index.html> (last visited Jun. 12, 2026).

¹⁴⁷ Letter from Dawn Hawkins, NCOSE CEO, and Kindsey P. Chadwick, NCOSE Interim President, to Jason Citron, Discord CEO and Co-Founder, (April 3, 2024) (available at https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2024_FINAL.pdf) (last visited Jun. 12, 2026).

¹⁴⁸ Letter from Dawn Hawkins, NCOSE CEO, and Kindsey P. Chadwick, NCOSE Interim President, to Jason Citron, Discord CEO and Co-Founder, (April 3, 2024) (available at https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2024_FINAL.pdf) (last visited Jun. 12, 2026).

¹⁴⁹ Ben Goggin, *Child predators are using Discord, a popular app among teens, for sextortion and abductions*, NBC News (July 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769> (last visited Jun. 11, 2026).

¹⁵⁰ Letter from Dawn Hawkins, NCOSE CEO, and Kindsey P. Chadwick, NCOSE Interim President, to Jason Citron, Discord CEO and Co-Founder, (April 3, 2024) (available at https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2024_FINAL.pdf) (last visited Jun. 12, 2026).

¹⁵¹ Letter from Dawn Hawkins, NCOSE CEO, and Kindsey P. Chadwick, NCOSE Interim President, to Jason Citron, Discord CEO and Co-Founder, (Apr. 3, 2024) (available at https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2024_FINAL.pdf) (last visited Jun. 12, 2026).

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3. Discord publicly touts a “zero-tolerance” policy while its own account architecture makes this policy meaningless.

106. Discord repeatedly represents that it has a “zero-tolerance” policy for users who exploit children. Yet Defendant designed its account system so that permanently banned users can simply create new anonymous accounts and return to the platform within minutes.

107. Because Defendant does not verify users’ identities and permits users to create anonymous accounts, a “permanent ban” on Discord is, as a practical matter, tied only to the banned account—not to the individual who was banned.

108. A ban loses much of its deterrent value when a banned user can create a new anonymous account, assume a new identity, and return to Discord in approximately four minutes at no cost.

109. Accordingly, Defendant’s publicly proclaimed “zero-tolerance” policy functions, in practice, as little more than a brief interruption. Defendant has long known this but nevertheless chose not to implement identity verification or other measures that would give permanent bans practical effect.¹⁵²

E. Defendant’s deceptive and unlawful conduct has harmed Louisiana children.

110. The dangers created by Defendant’s design and operation of Discord, combined with its false safety assurances, have caused real, devastating harm to Louisiana children.

111. For example, in 2022, a Louisiana man pled guilty to possessing CSAM, admitting that “he created a Discord account,” that “other Discord users would share CSAM on the website,” and that he would “upload the saved CSAM from his phone to other Discord users.”¹⁵³

112. In January 2025, a Baton Rouge man was arrested and charged with sexually exploiting a fourteen-year-old girl using Discord.¹⁵⁴ According to arrest records, the man “began communicating with her on Roblox, an online gaming platform, before transitioning her to Discord,” where he coerced her into sending sexually explicit images of herself.¹⁵⁵ The arrest

¹⁵² Discord, *Ban Evasion and Advanced Harassment*, (Jun. 3, 2022), <https://discord.com/safety/ban-evasion-and-advanced-harassment> (last visited Jul. 22, 2026).

¹⁵³ U.S. Dep’t of Justice, *Registered Sex Offender Pleads Guilty to Possession of Child Sex Abuse Material* (May 10, 2022), <https://www.justice.gov/usao-edla/pr/registered-sex-offender-pleads-guilty-possession-child-sexual-abuse-material> (last visited Jun. 11, 2026).

¹⁵⁴ WAFB Staff, *Man Accused of Internet Sex Crimes Allegedly Met Victims on Roblox, Discord*, WAFB (Jan. 31, 2025), <https://www.wafb.com/2025/01/31/man-accused-internet-child-sex-crimes-allegedly-met-victims-roblox-discord/> (last visited Jul. 21, 2026).

¹⁵⁵ WAFB Staff, *Man Accused of Internet Sex Crimes Allegedly Met Victims on Roblox, Discord*, WAFB (Jan. 31, 2025), <https://www.wafb.com/2025/01/31/man-accused-internet-child-sex-crimes-allegedly-met-victims-roblox-discord/> (last visited Jul. 21, 2026).

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records further indicate that the victim sent the man several hundred dollars to keep him from releasing nude photos of her, and that he communicated with her on Discord.¹⁵⁶

113. Another case involved a fourteen-year-old Lake Charles girl who reported that she had been communicating on Discord with a Texas man.¹⁵⁷ In September 2025, the Calcasieu Parish Sheriff announced the man's arrest for computer-aided solicitation of a minor and indecent behavior with juveniles.¹⁵⁸ A detective met with the girl at a Lake Charles hospital after she arrived there on foot and advised that she was suicidal.¹⁵⁹ Further investigation revealed that the communications on Discord included CSAM and that the man planned to travel to Lake Charles to engage in sexual activity with the girl.¹⁶⁰

114. Louisiana investigators made another Discord-related arrest in January 2026, when they arrested a Metairie man on more than 40 counts related to the possession of child sexual abuse material.¹⁶¹ According to the arrest warrant, the man uploaded CSAM on Discord.¹⁶² He was subsequently charged in a federal indictment with transportation of materials involving the sexual exploitation of minors and possession of materials involving the sexual exploitation of minors.¹⁶³

115. And in May 2026, a man from Nevada was arrested for victimizing an Acadiana child through online exploitation and other internet-based crimes, including encouraging the child to take her own life.¹⁶⁴ He faces multiple felony charges, including indecent behavior with juveniles, criminal assistance to suicide, computer-aided solicitation of a minor, and extortion.¹⁶⁵

¹⁵⁶ WAFB Staff, *Man Accused of Internet Sex Crimes Allegedly Met Victims on Roblox, Discord*, WAFB (Jan. 31, 2025), <https://www.wafb.com/2025/01/31/man-accused-internet-child-sex-crimes-allegedly-met-victims-roblox-discord/> (last visited Jul. 21, 2026).

¹⁵⁷ Aff. Arrest Warrant, *State of Louisiana v. Jesse Joe Ponce*, Case No. 25-27209 (Parish of Calcasieu, 14th JDC, May 27, 2025).

¹⁵⁸ Crystal Stevenson, *9/5: Calcasieu Parish Sheriff announces arrest list*, American Press (Sept. 5, 2025), <https://americanpress.com/2025/09/05/9-5-calcasieu-parish-sheriff-announces-arrest-list-4/> (last visited Aug. 24, 2026).

¹⁵⁹ Aff. Arrest Warrant, *State of Louisiana v. Jesse Joe Ponce*, Case No. 25-27209 (Parish of Calcasieu, 14th JDC, May 27, 2025).

¹⁶⁰ Aff. Arrest Warrant, *State of Louisiana v. Jesse Joe Ponce*, Case No. 25-27209 (Parish of Calcasieu, 14th JDC, May 27, 2025).

¹⁶¹ FOX 8 Staff, *Metairie man arrested on child sexual abuse material allegations*, Fox 8 (Jan. 16, 2026), <https://www.fox8live.com/2026/01/16/metairie-man-arrested-child-sexual-abuse-material-allegations/> (last visited Aug. 24, 2026); Aff. Arrest Warrant, *State of Louisiana v. Michael Paul Duhe Jr.*, Warrant No. A-08720-26 (Parish of Jefferson, 24th JDC, Jan. 13, 2026).

¹⁶² Aff. Arrest Warrant, *State of Louisiana v. Michael Paul Duhe Jr.*, Warrant No. A-08720-26 (Parish of Jefferson, 24th JDC, Jan. 13, 2026).

¹⁶³ *Metairie Man Indicted for Possessing Materials Involving Sexual Exploitation of Minors*, U.S. Attorney's Office, Eastern District of Louisiana (Jun. 29, 2026), <https://www.justice.gov/usao-edla/pr/metairie-man-indicted-possessing-materials-involving-sexual-exploitation-minors> (last visited Aug. 24, 2026).

¹⁶⁴ KPLC Digital Team, *Nevada man accused of trying to entice Acadiana child to commit suicide arrested and extradited to Lafayette, AG says*, 7KPLC (Jun. 12, 2026), <https://www.kplctv.com/2026/06/12/nevada-man-accused-trying-entice-acadiana-child-commit-suicide-arrested-extradited-lafayette-ag-says/> (last visited Aug. 21, 2026).

¹⁶⁵ KPLC Digital Team, *Nevada man accused of trying to entice Acadiana child to commit suicide arrested and extradited to Lafayette, AG says*, 7KPLC (Jun. 12, 2026), <https://www.kplctv.com/2026/06/12/nevada-man-accused-trying-entice-acadiana-child-commit-suicide-arrested-extradited-lafayette-ag-says/> (last visited Aug. 21, 2026).

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According to the arrest warrant, the man communicated with the twelve-year-old on Discord for approximately six months, coercing her to send nude photos of herself, urging her to commit suicide, and sending her sexually explicit videos of himself.¹⁶⁶

116. These cases are far from isolated. Louisiana's Internet Crimes Against Children Task Force has investigated numerous other cases involving the use of Discord to target and exploit children throughout the State. The victims in these cases include a fourteen-year-old targeted for sextortion in Catahoula Parish and a ten-year-old victim of extortion and computer-aided solicitation in Bossier Parish.

117. Moreover, these cases mirror a nationwide pattern recognized by federal law enforcement, child-protection organizations, and multiple state attorneys general, each concluding that Discord has become a significant venue for the grooming and exploitation of children despite Defendant's repeated public assurances regarding safety.

V. CAUSES OF ACTION

First Cause of Action: **Violations of the Louisiana Unfair Trade Practices Act (LUTPA)** **La. R.S. §51:1401 et seq.**

118. Plaintiff realleges and incorporates by reference each and every allegation set forth above as though fully alleged herein.

119. Plaintiff, the State of Louisiana, on behalf of itself and its citizens, including minor children, seeks injunctive relief, damages, restitution, and other equitable relief such as disgorgement, fees, costs, and penalties against Defendant under the Louisiana Unfair Trade Practices Act, La. R.S. § 51:1401, *et seq.* (LUTPA). Defendant engaged in unfair and deceptive business practices in the conduct of its trade and commerce by affirmatively marketing Discord as a platform that was designed with safety at its core, that it employed effective measures "by default" to protect children, and that it maintained a zero-tolerance approach toward child exploitation, while knowingly designing and operating Discord in ways that exposed children to grooming, exploitation, sexual abuse, and child sexual abuse material and failing to disclose those known risks and deficiencies to consumers. These business practices were and are deceptive, unfair, unscrupulous, oppressive, contrary to established public policy, and substantially injurious to the public, including Louisiana children and their parents.

¹⁶⁶ Aff. Arrest Warrant, *State of Louisiana v. Christian Jonathan Carnes*, Case No. 88-5864 (Parish of Lafayette, 15th JDC, May 20, 2026).

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120. Citizens of Louisiana who purchased subscriptions to Discord and/or who purchased or used Discord's products and services, including those who allowed their minor children to use Discord, are "consumers" under LUTPA.

121. The State of Louisiana is a "person" under LUTPA.

122. Citizens of Louisiana engaged in "consumer transactions" under LUTPA.

123. Defendant's repeated and continuing violations of LUTPA include, but are not limited to:

- Falsely representing that Discord was designed to be safe by design, safe "by default," and built around a "zero-tolerance" policy toward child exploitation when Defendant knew those representations did not accurately reflect the manner in which Discord was designed, operated, and maintained;
- Falsely representing that Discord's default safety settings and safety features adequately protected children while designing those protections to depend upon unverified, self-reported ages and maintaining default settings that facilitated contact between adults and minor users;
- Omitting, concealing, and suppressing material information concerning the prevalence of child exploitation on Discord, the limitations of Defendant's advertised safety features, and the known risks associated with Defendant's platform architecture and design choices;
- Directing advertising, marketing, and product design toward children and teenagers, including through Student Hubs, school-related communities, youth-oriented features, and messaging encouraging young users to socialize, build relationships, and spend time on Discord, while simultaneously failing to disclose the known risks associated with Defendant's platform;
- Continuing to market Discord as a safe platform for children despite years of notice from law enforcement, Congress, child-safety organizations, media reports, and Defendant's own reporting systems that Discord's design and architecture facilitated child grooming, exploitation, and the dissemination of child sexual abuse material; and
- Designing, operating, and marketing Discord in a manner intended to increase its user base, user engagement, and subscription and advertising revenue while knowingly exposing children to risks that Defendant repeatedly represented its platform was designed to prevent.

124. Defendant's unfair and deceptive business practices led consumers to falsely believe that Discord is safe for children. Defendant continued those practices despite years of notice—from law enforcement, Congress, child-safety organizations, media reports, and Defendant's own internal data and reporting obligations—that its representations concerning child safety were materially false and misleading.

125. Defendant knew that its public safety representations did not accurately reflect the manner in which Discord was designed and operated. Nevertheless, Defendant continued to market Discord as a platform that was safe by design and "safe by default" in order to increase its user

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base, user engagement, and advertising and subscription revenue, despite knowing that Discord's design and architecture exposed children to the very dangers Defendant claimed its platform was designed to prevent.

126. Defendant intended that parents and consumers rely upon its representations concerning child safety when deciding whether to permit their children to use Discord or to purchase Defendant's products and services. Those representations were material to reasonable consumers because the safety of minor children is a central consideration in determining whether to permit children to use an online communications platform.

127. Defendant's continuing course of commercial conduct, affirmative safety representations, omissions of material fact, and marketing practices were likely to mislead reasonable consumers and therefore constitute deceptive acts and practices in violation of LUTPA.

128. Defendant's continuing course of commercial conduct was intended to induce parents and minor children to use Discord and purchase subscriptions while exposing consumers to substantial harm that is not outweighed by any countervailing benefit. These business practices are unethical, oppressive, substantially injurious to consumers, and contrary to established public policy, and therefore constitute unfair acts and practices under LUTPA.

129. Defendant's conduct described herein creates substantial risks of physical, emotional, and financial harm to Louisiana consumers and, further, imposes additional burdens and financial harm to the State through the cost of treatment and other public safety concerns related to child predators, including, but not limited to, through law enforcement, victim-assistance, and other public expenditures associated with child exploitation.

130. The practices alleged herein constitute a pattern of unfair, and deceptive trade practices in violation of LUTPA.

131. Pursuant to La. R.S. 51:1407(A), the Attorney General has the right to seek injunctive relief to restrain Defendant's violations of LUTPA.

132. Pursuant to La. R.S. 51:1407(B) and (C), the Attorney General has the right to seek civil penalties for each violation, including enhanced civil penalties for violations committed with the intent to deceive and for violations committed against a person with a disability.

133. Pursuant to La. R.S. 51:1408, the Attorney General may seek any relief necessary to compensate any aggrieved person for any loss resulting from Defendant's violations of LUTPA, including restitution or equitable relief such as disgorgement.

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134. As a direct and proximate result of Defendant's unfair and deceptive practices, the State of Louisiana and its citizens are entitled to preliminary and permanent injunctive relief, ordering Defendant to cease the conduct described herein, as well as mandatory injunctive relief to provide and/or pay for public service announcements, and the implementation of effective and actual safeguards on Discord to protect children from child predators.

135. As a direct and proximate result of these deceptive practices, the State of Louisiana and its citizens have also been damaged and are entitled to recover actual damages, restitution, disgorgement, civil penalties, and attorneys' fees, costs, and all other relief permitted by law in an amount to be proven at trial.

136. Defendant's unfair and deceptive trade practices as described herein are ongoing within Louisiana and are likely to continue without an injunction.

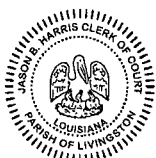
Second Cause of Action:
Negligence and Public Nuisance
La. C.C. Arts. 2315 and 2316

137. Plaintiff realleges and incorporates by reference each and every allegation set forth above as though fully alleged herein.

138. Plaintiff maintains that Defendant negligently designed, engineered, developed, operated, and marketed Discord by making deliberate product-design, operational, and business decisions that unnecessarily increased the foreseeable risk that children would be located, contacted, groomed, sexually exploited, and abused through the platform. Nevertheless, Defendant marketed Discord as safe by design, safe "by default," and with a "zero-tolerance" policy for child sexual exploitation. Despite years of notice from law enforcement, Congress, child-safety organizations, civil litigation, media reports, and Defendant's own internal reporting systems that Discord's architecture and design were being used for these purposes, Defendant prioritized profits over child safety. Defendant failed to exercise reasonable care by correcting the glaring flaws in its system and refused to implement reasonable and readily available safety measures. The same conduct also created and maintained a public nuisance under Louisiana law, giving rise to liability under La. C.C. arts. 2315 and 2316.

139. Having chosen to market Discord to children and teenagers, encourage their participation on the platform, and repeatedly represent that Discord was designed with safety at its core and safe by design and safe "by default," Defendant owed a duty to exercise reasonable care in the design, development, operation, and marketing of Discord so as not to expose foreseeable





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child users to unreasonable risks of grooming, sexual exploitation, child sexual abuse material, and other foreseeable harms. Defendant breached that duty through, among other things:

- Developing, marketing, and operating Discord with safety features and default settings that Defendant knew were inadequate to protect children from predators while continuing to represent that Discord was safe, with the intention of increasing revenue;
- Designing Discord's architecture to facilitate unsolicited private communications between adults and child users;
- Designing default settings that allowed adults to directly message child users and send friend requests with minimal restrictions;
- Designing purported "default" safety protections that depended upon unverified, self-reported age information that Defendant knew could be easily falsified;
- Failing to implement reasonable age-verification and identity-verification measures despite years of notice that adults routinely misrepresented their identities to contact and exploit children;
- Failing to implement reasonable measures to prevent known child predators and registered sex offenders from creating and maintaining Discord accounts;
- Failing to implement meaningful parental controls, including allowing minor users to disable or circumvent safety settings established by their parents;
- Designing its account architecture so that permanently banned users could readily evade bans by creating new anonymous accounts and returning to the platform within minutes;
- Failing to provide reasonable warnings to parents and child users concerning the known risks associated with Discord's platform architecture and the limitations of Defendant's promoted safety features; and
- Failing to implement other reasonable and readily available safeguards despite longstanding knowledge that Discord's architecture was being exploited to groom, sexually exploit, and abuse children.

140. Defendant's negligent design, operational, and business decisions created an environment in which adults seeking to exploit children could readily locate, contact, groom, and sexually exploit child users. These risks were repeatedly brought to Defendant's attention over a period of years through law enforcement investigations, congressional inquiries, reports from child-safety organizations, media investigations, civil litigation, and Defendant's own reporting systems.

141. Defendant's continued design, operation, and marketing of Discord despite this longstanding knowledge also created and maintained a public nuisance by unreasonably exposing Louisiana children and the public to ongoing risks of child grooming, sexual exploitation, child sexual abuse material, and related criminal activity. These conditions are the direct and foreseeable result of Defendant's own design choices, business practices, and operational decisions.

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142. As a direct and proximate result of Defendant's negligence and maintenance of a public nuisance, Louisiana children, their families, and the State of Louisiana have suffered and continue to suffer damages, including physical, emotional, psychological, financial, investigative, law enforcement, victim-assistance, and other public expenditures, in amounts to be proven at trial.

Third Cause of Action:
Unjust Enrichment

143. Plaintiff realleges and incorporates by reference each and every allegation set forth above as though fully alleged herein.

144. This cause of action is asserted expressly and solely in the alternative. To the extent the Court determines that the State of Louisiana lacks an adequate remedy at law with respect to any portion of the conduct or relief alleged herein, Plaintiff seeks recovery under the equitable doctrine of unjust enrichment pursuant to La. C.C. art. 2298.

145. Defendant knowingly obtained substantial revenues and other economic benefits through the operation and monetization of Discord, including through paid subscriptions and other revenue generated by the growth, engagement, and retention of its user base, including users in Louisiana. Defendant obtained those benefits while affirmatively representing that Discord was safe by design, safe "by default," and committed to a "zero-tolerance" policy toward child exploitation, despite knowing those representations did not accurately reflect the manner in which Discord was designed, operated, and maintained.

146. As alleged herein, Defendant retained those revenues and economic benefits while concealing or failing to disclose material information concerning the known risks associated with Discord's platform architecture, the limitations of its promoted safety features, and Defendant's longstanding knowledge that Discord was enabling the grooming, sexual exploitation, and abuse of children. Defendant nevertheless continued to market Discord in a manner intended to increase its user base, user engagement, and advertising and subscription revenue.

147. Defendant's enrichment occurred at the expense of the State of Louisiana and Louisiana consumers. Louisiana consumers purchased subscriptions, entrusted their children to Discord, and used the platform in reliance upon Defendant's representations concerning child safety. Because those representations were false, the State incurred substantial costs associated with investigating, preventing, prosecuting, and responding to child exploitation facilitated through Defendant's platform.





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148. To the extent Defendant derived revenues, profits, or other economic benefits through the conduct alleged herein, Defendant has been unjustly enriched. Equity and good conscience do not permit Defendant to retain those benefits because they were obtained through the unfair, deceptive, and negligent conduct alleged throughout this Petition.

149. Accordingly, to the extent La. C.C. art. 2298 applies, Defendant is bound to compensate the State of Louisiana and its citizens to the extent that Defendant has been unjustly enriched.

VI. TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

150. Plaintiff realleges and incorporates by reference each and every allegation set forth above as though fully alleged herein.

151. Generally, a plaintiff seeking issuance of a preliminary injunction bears the burden of establishing, by a preponderance of the evidence, a *prima facie* showing that the plaintiff will prevail on the merits and that irreparable injury or loss will result without the preliminary injunction. *Singleton v. E. Baton Rouge Par. Sch. Bd.*, 22-0667 (La. App. 1 Cir. 9/16/22), 353 So.3d 164, 176; La. C.C.P. art. 3601.

152. However, the Louisiana Supreme Court has long held that when the conduct sought to be enjoined constitutes a direct violation of a prohibitory law, the plaintiff is entitled to injunctive relief without the requisite showing of irreparable injury. *Jurisich v. Jenkins*, 99-0076 (La. 10/19/99), 749 So.2d 597, 599. “Once a plaintiff has made a *prima facie* showing that the conduct to be enjoined is reprobated by law, the petitioner is entitled to injunctive relief without the necessity of showing that no other adequate legal remedy exists.” *Id.*

153. In any event, the State’s inability to enforce its duly enacted laws inflicts irreparable harm on the State.

154. Moreover, under LUTPA, whenever the Attorney General has reason to believe that any person is using, has used, or is about to use any method, act, or practice declared to be unlawful under La. R.S. 51:1405, she may bring any action for injunctive relief in the name of the State against such person to restrain and enjoin the use of such method, act, or practice. La. R.S. 51:1407(A). The practices declared unlawful under La. R.S. 51:1405 are “[u]nfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce.”

155. The Attorney General has the authority to seek injunctive relief without a showing of irreparable harm against a violator or potential violator. *Novelaire Techs., L.L.C. v. Harrison*,

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08-157 (La. App. 5 Cir. 8/19/08), 994 So.2d 57, 62.

156. Courts are authorized to issue temporary restraining orders or preliminary and permanent injunctions to restrain and enjoin violations of LUTPA, and such restraining orders or injunctions shall be issued without bond. La. R.S. 51:1407(A).

157. The Attorney General has reason to believe that Defendant is engaging in, has engaged in, or is about to engage in unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce, and that a temporary restraining order and a preliminary injunction would be in the public interest. Consequently, this Court should immediately enter a temporary restraining order enjoining Defendant and its officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise, from continuing to treat Louisiana consumers unlawfully, unfairly, and deceptively in the ways described herein during the pendency of this suit.

158. This Court may issue a temporary restraining order with notice to the opposing party, or without notice where the applicant's attorney certifies to the court in writing the efforts that have been made to give notice or the reasons supporting the applicant's claim that notice should not be required. La. C.C.P. art. 3603. A preliminary injunction requires notice. La. C.C.P. art. 3602.

VII. PRAYER FOR RELIEF

159. WHEREFORE, Plaintiff prays that, in due course, the Court issue a permanent injunctive order against Defendant, including any employees, agents, contractors, and those persons cooperating or participating with them, to restrain, enjoin, and prohibit Defendant from:

- A. Engaging in any activity in violation of LUTPA;
 - B. Representing that Discord has adequate safety features;
 - C. Failing to implement reasonable measures designed to protect minors from grooming, exploitation, trafficking, sexual abuse, and child sexual abuse material;
 - D. Any other provisions that are found to be equitable after a trial on this matter.
1. Plaintiff further prays for relief as follows:
- A. In due course, the Court issue an Order that Defendant pay restitution to the State of Louisiana for all expenses reasonably related to its practices described herein through any manner deemed practicable by the Court.

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- B. Award disgorgement of all revenues or profits obtained as a result of the unlawful conduct alleged herein to the extent authorized by law.
- C. Plaintiff further prays that, in due course, the Court issue an Order requiring Defendant to reimburse the Office of the Attorney General for all costs and expenses incurred in the investigation and prosecution of this action, including attorney's fees under La. R.S. 51:1408 and 1409.
- D. Plaintiff further prays for all additional civil penalties allowable under law.
- E. Plaintiff further prays for all additional damages allowable under law.
- F. Plaintiff further prays that this Court grant any further relief that it finds justice may require or is otherwise equitable.

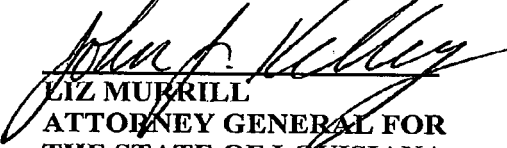
JURY DEMAND

Plaintiff, the State of Louisiana, hereby demands a trial by jury on all claims so triable pursuant to La. C.C.P. art. 1731 and related statutes.

Dated: August 26, 2026

Respectfully submitted,

Liz Murrill
Attorney General of Louisiana


LIZ MURRILL
ATTORNEY GENERAL FOR
THE STATE OF LOUISIANA
LOUISIANA DEPARTMENT OF
JUSTICE

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John Kelley (Bar No. 35506)
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PLEASE SERVE:

Discord Inc.
Through its registered agent for service of process





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