

April 10, 2025

Chair Andrew Ferguson and Commissioner Melissa Holyoak  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Re: Request for Investigation of Meta Platforms, Inc. for violations of the Children's Online Privacy Protection Act in Horizon Worlds

Via E-Mail

Dear Chair Ferguson and Commissioner Holyoak:

Fairplay respectfully requests the Federal Trade Commission (FTC) investigate whether Meta Platforms, Inc. is violating the Children's Online Privacy Protection Act (COPPA)<sup>1</sup> in connection with the operation of its virtual reality (VR) platform Horizon Worlds. As outlined in the Request for Investigation below, Meta has knowingly allowed a substantial number of children under the age of 13 to improperly access Horizon Worlds using accounts that do not require parental notice and consent, rather than more privacy-protective accounts designed for children. As a result, Meta has knowingly collected personal information from those under-13 users in violation of COPPA. We are including a sworn statement from former Director of Product Marketing at Meta Kelly Stonelake as evidence for this claim. We urge the Commission, which is already investigating Meta's compliance with existing orders, to pursue this additional information about ongoing violations of kids' and families' privacy expeditiously.

We appreciate your consideration and are available to discuss any questions you may have.

Respectfully Submitted,

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*†Fairplay would like to thank Caroline Pruchnicki, University of Wisconsin-Madison, for her research and contributions to this Request for Investigation.*

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<sup>1</sup> 15 U.S.C. §§ 6501–6506.

## *Introduction*

In this Request for Investigation, Fairplay sets forth evidence that Meta is violating COPPA in Horizon Worlds. Our latest research follows years of advocacy from Fairplay and its partners raising the alarm about Meta’s flagrant violations of COPPA and other consumer protection laws.<sup>2</sup> Alongside a coalition of organizations and experts, we specifically urged Meta in April 2023 not to expand access to Horizon Worlds to teens.<sup>3</sup> Meta did it anyway one week later, and last year, it further expanded the platform to children ages 10-12. In a sworn statement attached to this complaint, former Director of Product Marketing at Meta, Kelly Stonelake, details how the company marched forward with expanding its VR technology to young users despite evidence of widespread risk, all in the name of profit.<sup>4</sup> In this filing, Fairplay sets forth its own evidence that Meta employees undeniably have actual knowledge that children under the age of 13 are using Horizon Worlds without COPPA protections to this day – and that this problem and their knowledge significantly precedes the creation of child accounts last November.

It has been widely reported that Meta’s flagship VR platform, Horizon Worlds, is overrun with children. In November, Wired ran a report headlined “Meta Horizon Worlds has been taken over by children,” in which it explained:

“Pop into a VR realm like Meta’s Horizon Worlds for even a moment, and an army of kids in their digital avatars will swarm all around you almost everywhere you go—waving, laughing, jumping, tossing digital objects, and shouting everything from high-pitched shrieks to straight up racial slurs ... That’s right, the metaverse is alive and, well ... *it’s populated primarily by children.*”<sup>5</sup>

The Washington Post has run similar stories, reporting that experts believe “kids and teens are using the program in droves, operating accounts held by adults or lying about their ages” and

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<sup>2</sup> Center for Digital Democracy, Electronic Privacy Information Center (EPIC) & Fairplay, et al., Letter to FTC Re: Order to Show Cause and Proposed Order In re Facebook, Inc. (June 13, 2023), <https://fairplayforkids.org/wp-content/uploads/2023/06/FTCMetaLetter.pdf>; Center for Countering Digital Hate, Center for Digital Democracy & Fairplay, et al., Letter to Mark Zuckerberg re: Expanding Horizon Worlds to Users Ages 13-17 (April 14, 2023), <https://fairplayforkids.org/wp-content/uploads/2023/04/HorizonLetter.pdf>; Campaign for a Commercial-Free Childhood (now Fairplay) et al., Request for Investigation of Facebook Messenger Kids (Oct. 3, 2018) <https://fairplayforkids.org/wp-content/uploads/archive/devel-generate/wab/FTC%20FB%20Messenger%20Kids%20Letter.pdf>.

<sup>3</sup> Center for Countering Digital Hate, Center for Digital Democracy & Fairplay, et al., Letter to Mark Zuckerberg, *supra* note 2.

<sup>4</sup> Sworn Statement of Kelly Stonelake, Appendix A.

<sup>5</sup> Boone Ashworth, *Meta Horizon Worlds Has Been Taken Over by Children*, Wired (Nov. 12, 2024) (emphasis added), <https://www.wired.com/story/meta-horizon-worlds-taken-over-by-children/>.

warning that the platform is “rife with bigotry [and] harassment.”<sup>6</sup> In one such report, Horizon Worlds was called “a hunting ground for sexual predators.”<sup>7</sup>

Following substantial research published on the potential harms children face when exploring immersive social gaming platforms and VR environments,<sup>8</sup> Fairplay launched a rigorous, months-long investigation into Horizon Worlds. Fairplay researchers spent substantial time on the platform using the Meta Quest 3 and Quest 2 VR headsets, and used voice data recorded from live gameplay to establish that at least 33% of users encountered in Horizon Worlds’ are children under the age of 13, and that these users are accessing the platform with standard accounts (designed for users aged 13 and older), rather than Meta’s more privacy-protective child accounts (designed for users between 10-12 years old). Fairplay found that this is consistent across many of the most popular virtual games and experiences within Horizon Worlds, as researchers encountered at least one child in 10 out of 12 of the games and experiences visited during the investigation. Fairplay also uncovered that Meta stations “community guides” in certain virtual spaces within Horizon Worlds, and that these Meta employees have actual knowledge that child users are exploring the platform with standard accounts.

Fairplay also analyzed hundreds of customer reviews for Horizon Worlds, which were published in Meta’s own app store and written exclusively by verified users. In these reviews, users report an overwhelming presence of underage children, frequent incidences of cyberbullying, and an obvious risk of sexual predation. As explained in detail below, Fairplay’s exploration of Horizon Worlds, along with its analysis of the platform’s verified customer reviews, establishes that Meta is knowingly collecting copious amounts of personal information from children under the age of 13, without parental consent.

Following its investigation, Fairplay worked with Ms. Stonelake, a former Meta executive turned whistleblower, to confirm the findings laid out in this Request for Investigation. Ms. Stonelake worked as the Director of Product Marketing for Horizon Worlds and in that position had a deep understanding of Meta’s knowledge of underage users on the platform.<sup>9</sup> In support of Fairplay’s investigation, Ms. Stonelake provided a sworn statement in which she describes specific instances where multiple Meta executives were given, or directly acknowledged, the overwhelming presence of underage users accessing Horizon Worlds with standard accounts.<sup>10</sup>

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<sup>6</sup> Naomi Nix, *Meta doesn’t want to police the metaverse. Kids are paying the price.*, Washington Post (Mar. 8, 2023),

<https://www.washingtonpost.com/technology/2023/03/08/metaverse-horizon-worlds-kids-harassment/>.

<sup>7</sup> Will Oremus, *Kids are flocking to Facebook’s ‘metaverse.’ Experts worry predators will follow.*, Washington Post (Feb. 7, 2022), <https://www.washingtonpost.com/technology/2022/02/07/facebook-metaverse-horizon-worlds-kids-safety/>.

<sup>8</sup> See generally Criscillia Benford & Rachel Franz, *Buying to Belong: Youth and Virtual Assets in the Metaverse*, Fairplay (Feb. 2025) <https://fairplayforkids.org/wp-content/uploads/2025/02/Buying-to-Belong.pdf> [hereinafter *Buying to Belong*].

<sup>9</sup> Sworn Statement of Kelly Stonelake, Appendix A, at 3.

<sup>10</sup> Sworn Statement of Kelly Stonelake, Appendix A, at 4-7.

Ms. Stonelake further describes how these Meta executives instigated an intentional campaign to shirk their responsibilities under COPPA by avoiding documentation of discussions in which employees raised concerns about underage users improperly accessing the platform.<sup>11</sup>

In addition to documenting past and ongoing COPPA violations, Fairplay’s investigation also indicates that Meta’s conduct is causing substantial injury to the privacy and safety of underage users in Horizon Worlds. VR technology can harvest an almost incomprehensible amount of sensitive data and “works as an extraction system to collect and process personal information in a way that no single human or portal could using previous technology.”<sup>12</sup> A single 20-minute VR session yields more than 2 million individual data points.<sup>13</sup>

VR headsets are capable of tracking a user’s three-dimensional physical space, including private areas like a child’s bedroom. They can monitor other people within the user’s proximity, such as friends or family members. They can track a user’s physical movements, including their head position, height, and location of their body parts in a 3D plane. They can collect and analyze body language, including a user’s gaze, facial expressions, heart rate, and emotions. They can detect precise eye movements to measure focus and other behavioral data. And, of course, they collect a host of other forms of traditional online personal information like IP addresses, VR web browser activity, and unique device identifiers.<sup>14</sup>

These data collection practices are consistent with Meta’s own privacy policies, wherein Meta describes in detail the types of personal information harvested from standard accounts using Quest VR headsets. The Supplemental Meta Platforms Technologies Privacy Policy states that Meta may track a user’s physical surroundings and movements, audio and video data from a headset’s outward-facing camera and microphone, a user’s eye movements and facial expressions, and much more.<sup>15</sup> Meta states that it uses this data for a host of purposes, including to improve a user’s VR experience (i.e., maximize engagement) and to place ads and other sponsored content.<sup>16</sup>

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<sup>11</sup> Sworn Statement of Kelly Stonelake, Appendix A, at 6.

<sup>12</sup> Girard Kelly & Jeff Graham, et al., *Privacy of Virtual Reality: Our Future in the Metaverse and Beyond*, Common Sense Media (2022), at 2.  
<https://www.common Sense Media.org/sites/default/files/research/report/privacy-of-virtual-reality-our-future-in-the-metaverse-and-beyond.pdf>.

<sup>13</sup> Jeremy Bailenson, *Protecting Nonverbal Data Tracked in Virtual Reality*, JAMA Pediatrics (2018),  
<https://vhil.stanford.edu/sites/g/files/sbiybj29011/files/media/file/bailenson-jamap-protecting-nonverbal.pdf>.

<sup>14</sup> Kelly & Graham, *supra* note 12, at 4.

<sup>15</sup> Supplemental Meta Platforms Technologies Privacy Policy, Meta (March 31, 2025),  
[https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk\\_cj](https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk_cj) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>16</sup> Supplemental Meta Platforms Technologies Privacy Policy, Meta (March 31, 2025),  
[https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk\\_cj](https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk_cj) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

In addition to improperly collecting immense amounts of data, Meta’s conduct exposes young users to the risk of substantial injury from cyberbullying and sexual predation. Fairplay’s investigation found multiple examples of harmful cyberbullying, as well as consistent user reports of sexual misconduct and abuse. These findings are consistent with previously published research and reporting on Horizon Worlds.<sup>17</sup> And, due to the immersive nature of exploring the platform in VR, it is likely these harms will have an even greater impact on the health and well-being of children. Research shows that being fully immersed in a VR environment causes young people to treat their avatars as if they are part of their own bodies, thereby increasing the harm from negative social interactions.<sup>18</sup> The visceral sense of presence within VR also causes young users to develop stronger parasocial relationships, leaving them more susceptible to manipulation.<sup>19</sup>

Lastly, Fairplay found that Meta’s conduct is subjecting underage users to financial manipulation in the form of data-driven, targeted marketing, which preys on their developing social anxieties and desire for inclusion. Meta relies on the hyper-social nature of Horizon Worlds to design immersive “stealth” marketing tactics like brand partnerships, collabs, sponsored content, and “organic” community development. By blurring the lines between paid influence, entertainment, and engineered social structures, Meta is able to manipulate young users in order to build brand loyalty and trigger purchasing behavior. As a result, young users are manipulated into swapping real dollars for “Meta Credits” in order to buy expensive virtual assets like clothes and accessories for their avatars.

Based on the foregoing, this Request for Investigation establishes: 1) that children under the age of 13 make up a substantial percentage of users within Horizon Worlds; 2) that these children are accessing the platform using standard accounts, rather than privacy-protective child accounts that enable parental notice and consent; 3) that Meta has actual knowledge that it is collecting copious amounts of data from child users without parental consent, in flagrant violation of COPPA; and 4) that children using Horizon Worlds face a range of harms. Many of the harms described in Section VI of this complaint affect teenagers in addition to children under 13, but this Request for Investigation is not a comprehensive analysis of teens’ experiences in Horizon Worlds.

Accordingly, the Commission must investigate Meta’s COPPA violations in connection with its operation of Horizon Worlds, as well as the associated harm Meta’s conduct is causing to young users. Meta’s violations of the law should be addressed to the full extent of the Commission’s authority. In 2023, the Commission announced its intent to reopen its 2020 settlement order with Meta and include a provision preventing Meta from profiting off of minors’

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<sup>17</sup> *Buying to Belong*, *supra* note 8, at 45; Center for Countering Digital Hate, *Horizon Worlds Exposed: Bullying, Sexual Harassment of Minors and Harmful Content are Rife in Meta’s Flagship VR Product* (Mar. 8, 2023), [https://counterhate.com/wp-content/uploads/2023/03/Horizon-Worlds-Exposed\\_CCDH\\_0323.pdf](https://counterhate.com/wp-content/uploads/2023/03/Horizon-Worlds-Exposed_CCDH_0323.pdf); Nix, *Meta Doesn’t Want to Police the Metaverse*, *supra* note 6.

<sup>18</sup> *Buying to Belong*, *supra* note 8, at 45.

<sup>19</sup> *Id.*

data.<sup>20</sup> The Commission recently affirmed in a 5-0 vote that it has the authority to modify its consent order with Meta with respect to its privacy practices.<sup>21</sup> The flagrant ongoing COPPA violations outlined in this Request for Investigation provide a strong additional basis for the Commission to use that authority to ban Meta from monetizing the personal data of minors.<sup>22</sup>

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<sup>20</sup> Federal Trade Commission, *FTC Proposes Blanket Prohibition Preventing Facebook from Monetizing Youth Data* (May 3, 2023), <https://www.ftc.gov/news-events/news/press-releases/2023/05/ftc-proposes-blanket-prohibition-preventing-facebook-monetizing-youth-data>.

<sup>21</sup> Commission Decision Regarding Section 5(B) Modification Authority, *In the Matter of Facebook, Inc.*, Docket No. C-4365 (Jan. 10, 2025).

<sup>22</sup> Proposed Decision and Order, *In the Matter of Facebook, Inc.*, Docket No. C-4365 (May 3, 2023).

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## I. Background

Before detailing the significance of Meta’s improper conduct, it is important to provide some background information on key terms related to Meta’s VR products and experiences. The “metaverse” is a general concept used to describe explorable, 3D immersive environments where people can move easily across virtual spaces, engage in a variety of activities, and socialize with other users through avatars. It’s not limited to one specific brand, company, or platform. It can be accessed through a variety of personal computers, video game systems, mobile devices, or highly immersive VR and extended reality (XR) headsets. Many of the most popular platforms within the metaverse offer “social gaming” experiences, where users can meet new people, spend real money while shopping for virtual goods, and participate in shared experiences like live concerts and sporting events.<sup>23</sup>

Growth of metaverse platforms has exploded in the last decade. Some estimate that metaverse platforms have more than 600 million monthly active users collectively, contributing to an overall market of \$783.3 billion.<sup>24</sup> Approximately 30 million users under age 13 log in to Roblox in and outside of VR every single day,<sup>25</sup> and other major platforms like Fortnite are growing year over year.<sup>26</sup>

In line with its 2021 name change, “Meta” is also investing in its VR and metaverse products at breakneck speed, hoping to be the leader of a potential \$5 trillion dollar market.<sup>27</sup> Meta spent nearly \$50 billion dollars in the last four years on its Reality Labs Division, which is responsible for building Meta’s line of “Quest” VR headsets.<sup>28</sup> Meta shipped more than 20 million

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<sup>23</sup> *Buying to Belong*, *supra* note 8, at 7; see also Events in World, Meta (April 9, 2025),

[https://www.oculus.com/experiences/quest-2/2532035600194083/events/?intern\\_source=blog&intern\\_content=venues-event-lineup](https://www.oculus.com/experiences/quest-2/2532035600194083/events/?intern_source=blog&intern_content=venues-event-lineup) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>24</sup> Yonatan Raz-Fridman, *Understanding the Economic Potential of the Metaverse and Investing in the Future of the Internet*, Nasdaq (April 22, 2024), <https://www.nasdaq.com/articles/understanding-the-economic-potential-of-the-metaverse-and-investing-in-the-future-of-the-internet>; Matthew Kanterman & Nathan Naidu, *Metaverse may be \$800 billion market, next tech platform*, Bloomberg (Dec. 1, 2021),

<https://www.bloomberg.com/professional/insights/markets/metaverse-may-be-800-billion-market-next-tech-platform/>.

<sup>25</sup> Graham Fraser, *Parents allowed to block children's games and friends on Roblox*, BBC (April 2, 2025), <https://www.bbc.com/news/articles/c86j9ygw45xo>. This number reflects users logging into Roblox through all interfaces, including VR, mobile, and gaming consoles.

<sup>26</sup> Aaron Astle, *Fortnite maker "financially sound" as Epic Games Store hits 70 million monthly active users*, PocketGamer.biz (Oct. 7, 2024), <https://www.pocketgamer.biz/fortnite-maker-financially-sound-as-epic-games-store-hits-70-million-monthly-active-users/>;

<sup>27</sup> McKinsey & Company, *Value creation in the metaverse: The real business of the virtual world* at 6-7 (June 2022), [https://www.mckinsey.com/~/\\_/media/mckinsey/business%20functions/marketing%20and%20sales/our%20insights/value%20creation%20in%20the%20metaverse/Value-creation-in-the-metaverse.pdf](https://www.mckinsey.com/~/_/media/mckinsey/business%20functions/marketing%20and%20sales/our%20insights/value%20creation%20in%20the%20metaverse/Value-creation-in-the-metaverse.pdf).

<sup>28</sup> Yasmin Khorram, *Meta’s reality check: Inside the \$45 billion cash burn at Reality Labs*, Yahoo!finance (July 28, 2024),



units of its VR headsets by the end of 2023. And, with the recent release of Meta’s more affordable, \$299 Meta Quest 3s, that growth is expected to continue in 2025.<sup>29</sup> Mark Zuckerberg has called the metaverse the “Holy Grail” of technological social experiences, and the fact that Meta is comfortable investing such a staggering amount of money in Reality Labs signals how vital VR experiences are to its future.<sup>30</sup>

“Meta Horizon” is the operating system upon which Meta offers immersive experiences through its VR headsets. It is the core software that powers Meta’s VR products, providing an in-headset virtual interface where users can connect with one another, an app store where they can download curated games and experiences, a web browser, and other interactive features. The Meta Horizon operating system works in conjunction with the Meta app to allow users to connect their VR headsets to their Meta accounts.

This Request for Investigation will focus on privacy and safety violations within “Horizon Worlds,” a social gaming platform owned and operated by Meta within its Horizon operating system. Horizon Worlds is considered part of the “metaverse” and can be accessed through Meta’s line of VR headsets like the Quest 2, Quest 3, and Quest 3s (formerly “Oculus”).<sup>31</sup> Horizon Worlds is Meta’s flagship VR experience and is positioned as a competitor to Roblox and VR Chat. The platform has consistently attracted a young userbase of children and teens,<sup>32</sup> which is not surprising considering that its advertisements feature bright colors and bubbly avatars with cartoon dinosaurs, a happy dancing cactus, and toy bubble guns.

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<https://finance.yahoo.com/news/metaverse-reality-check-inside-the-45-billion-cash-burn-at-reality-labs-125717347.html>

<sup>29</sup> David Heaney, *Meta Reality Labs Achieves Its Highest Ever Quarterly Revenue, \$1.08 Billion*, Upload (January 29, 2025), <https://www.uploadvr.com/quest-3s-meta-reality-labs-record-quarterly-yearly-revenue-2024/#:~:text=Meta%20Reality%20Labs%20achieved%20its,the%20launch%20of%20Quest%203S>

<sup>30</sup> Kara Carlson, *At SXSW, Mark Zuckerberg says metaverse is 'Holy Grail' of social experience*, Austin American-Statesman (Mar. 16, 2022), <https://www.statesman.com/story/business/2022/03/16/sxsw-facebooks-mark-zuckerberg-says-metaverse-future-internet/7051230001/>.

<sup>31</sup> See Meta Quest 3s, Meta (April 9, 2025), [https://www.meta.com/quest/quest-3s/?utm\\_source=gg&utm\\_medium=pla&utm\\_campaign=21672115855&utm\\_term=&utm\\_content=&utm\\_ad=&utm\\_location=9193912&utm\\_location2=&utm\\_placement=&utm\\_device=c&utm\\_matchtype=&utm\\_feed=&utm\\_adposition=&utm\\_product=SK-1000203-01&&gad\\_source=1&gclid=CjwKCAiAnKi8BhB0EiwA58DA4ayB5BBjlbEyigXBeEReGR\\_al9HmQoMyuKRpow7tKf-JLaA2LOGsoBoCne0QAvD\\_BwE&gclsrc=aw.ds](https://www.meta.com/quest/quest-3s/?utm_source=gg&utm_medium=pla&utm_campaign=21672115855&utm_term=&utm_content=&utm_ad=&utm_location=9193912&utm_location2=&utm_placement=&utm_device=c&utm_matchtype=&utm_feed=&utm_adposition=&utm_product=SK-1000203-01&&gad_source=1&gclid=CjwKCAiAnKi8BhB0EiwA58DA4ayB5BBjlbEyigXBeEReGR_al9HmQoMyuKRpow7tKf-JLaA2LOGsoBoCne0QAvD_BwE&gclsrc=aw.ds) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>32</sup> Sworn Statement of Kelly Stonelake, Appendix A at 6-7.



Home Games Apps Worlds Quest+

Meta Quest Search worlds, app...

### Meta Horizon

Multiplayer pick

#### Meta Horizon Worlds

★ 3.6 (9.6K) · Social

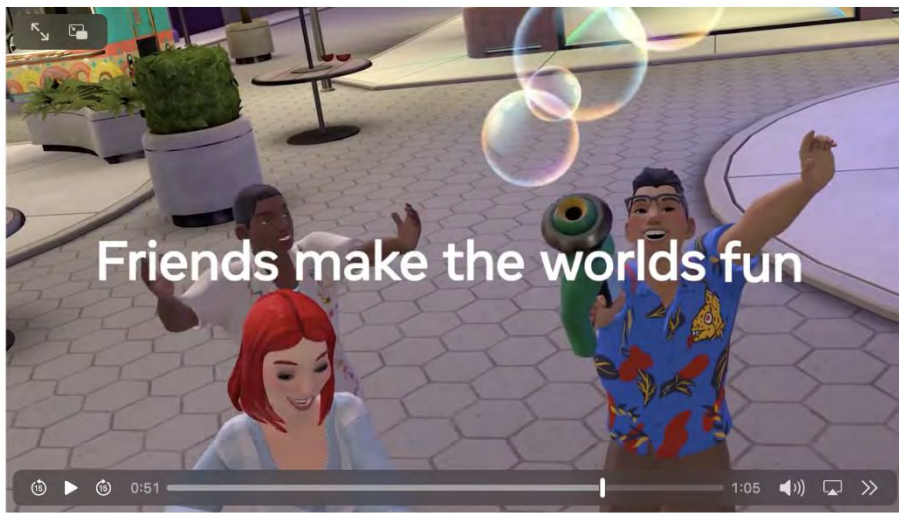

Add to wishlist Share

Flag this app

**Teen**  
Users Interact

[Get](#)

In-app purchases available



*Top: An image of a Meta advertisement for its Quest 3 VR headsets  
Middle: The Meta Horizon Worlds title page in the Meta Store  
Bottom: A screenshot from a video advertisement for Meta Horizon Worlds which was posted in the Meta Store*



*A screenshot from a video advertisement for Meta Horizon Worlds that was posted in the Meta Store*

Users explore Horizon Worlds through personalized virtual avatars. They can meet up and interact in virtual spaces, play virtual games, and communicate through live voice chat. Children searching for featured games and experiences within Horizon Worlds will see titles like “Pizza Kitchen,” “Spin the Bottle,” (a popular Russian roulette-style game that involves shooting other players, not kissing them) and “VR Classroom.” Users can also gather in “Horizon Central,” which functions as a virtual town square and jumping-off point for Meta’s other curated experiences.

The games, spaces, and experiences within Horizon Worlds are created by Meta and third-party developers (also known as Meta “creators”).<sup>33</sup> These creators make money off of microtransactions within the platform, as well as through the promotion of their own products and services sold outside the platform on third-party apps and websites. Data collection within Horizon Worlds is governed by two separate sets of privacy policies, one for users over the age of 13, and one for children aged 10-12.<sup>34</sup>

Meta allows children as young as 10 years old to access games and experiences on its Quest VR headsets. Users aged 10-12 are ostensibly required to have a “child account,” which is connected to a standard account run by their parent or legal guardian via the Meta app.<sup>35</sup> The

<sup>33</sup> Developer Data Use Policy, Meta (April 9, 2025), <https://developers.meta.com/horizon/policy/data-use/> (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>34</sup> Supplemental Meta Platforms Technologies Privacy Policy, Meta (March 31, 2025), [https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk\\_cj](https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk_cj) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>); Parent Privacy Disclosure, Meta (March 31, 2025), [https://www.meta.com/legal/quest/parent-privacy-disclosure/?utm\\_source=www.meta.com&utm\\_medium=organicsearch](https://www.meta.com/legal/quest/parent-privacy-disclosure/?utm_source=www.meta.com&utm_medium=organicsearch) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>35</sup> Introducing New Parent-Managed Meta Accounts for Families, Meta (April 3, 2025), <https://www.meta.com/blog/meta-accounts-parent-managed->

distinction between a standard account and a child account is crucial, as Meta claims that it operates child accounts in a safe and privacy-protective manner. As explained in detail below, child accounts require parental consent for data collection, can be enabled to limit certain adult-themed games and experiences, and prevent child users from speaking or listening to strangers.

Standard accounts, on the other hand, are subject to a host of data collection practices that would violate many of COPPA’s prohibitions when applied to under 13 users. These accounts do not receive any of the safeguards established for children,<sup>36</sup> and they do not require any form of verifiable parental consent.<sup>37</sup> As detailed below, children are easily able to use standard accounts on a Meta Quest VR headset to access Horizon Worlds. They can quickly switch back and forth between a child account and a standard account on the same device, or they can simply operate a Quest VR headset without ever setting up a child account in the first place.

When a user under the age of 13 plays Horizon Worlds with a standard account, rather than a child account, they face serious risks to their privacy and safety. They are able to access graphic adult environments. They have to navigate a maze of unscrupulous marketing and financial manipulations. And they encounter a steady stream of cyberbullying and risk of sexual exploitation. Meta also hoovers up untold amounts of their personal information, which would otherwise be protected under COPPA. Their VR headsets track their eye movements, record their voices, measure their facial expressions, analyze their emotions, and scan their physical surroundings, all without parental consent.

Prior to November 25, 2024, child accounts existed for users 10-12 years old, but those accounts were prohibited from accessing Horizon Worlds altogether, as the platform was purportedly limited to users 13 and older.<sup>38</sup> That means the only way for a child to have accessed

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[families/?srsltid=AfmBOorW0FyRHB7TGao7JV7aHmvNJrZO4hsSQdeDbki5qyIOa313Q-zF](https://www.meta.com/blog/horizon-worlds-teens-expansion-us-canada/?srsltid=AfmBOorW0FyRHB7TGao7JV7aHmvNJrZO4hsSQdeDbki5qyIOa313Q-zF) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>)

<sup>36</sup> While standard accounts do not have the same privacy and safety protections as child accounts, they can be enabled to provide certain safety features for teens. When a user between the ages of 13-17 creates a standard account, they have the option to voluntarily link that account to the Meta Family Center, which allows their parent or guardian to implement certain parental supervision features. Teens also have the option to use a limited set of safety features such as the ability to filter or “garble” voice chat from strangers and/or the ability to decline follow requests. See Welcoming Teens To Horizon Worlds, Meta (April 3, 2025), <https://www.meta.com/blog/horizon-worlds-teens-expansion-us-canada/?srsltid=AfmBOorhWsltiOcm59uqgd15dgwHk4m1bsvMCCgWciIIc16FCPQQUvD> (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>37</sup> See Supplemental Meta Platforms Technologies Privacy Policy, Meta (March 31, 2025), [https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk\\_cj](https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk_cj) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>)

<sup>38</sup> See Introducing New Parent-Managed Meta Accounts for Families, Meta (April 3, 2025), <https://www.meta.com/blog/meta-accounts-parent-managed-families/?srsltid=AfmBOorW0FyRHB7TGao7JV7aHmvNJrZO4hsSQdeDbki5qyIOa313Q-zF> (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>); Welcoming Teens To Horizon Worlds, Meta (April 3, 2025), <https://www.meta.com/blog/horizon-worlds-teens-expansion-us->

Horizon Worlds at that time was to use a standard account. On November 25, 2024, Meta quietly introduced the ability for child accounts to access Horizon Worlds with parental approval, but limited those child accounts to certain experiences and features within the game.<sup>39</sup> But, as outlined below, Meta continues to allow children to access Horizon Worlds using standard accounts, despite this policy change.

## **II. Investigation of Horizon Worlds**

From July 2024 to March 2025, Fairplay documented the experiences of children in Horizon Worlds through a multi-pronged investigation. First, Fairplay conducted hands-on research by systematically exploring popular games and experiences within Horizon Worlds and logging the percentage of users with obvious child voices. Second, Fairplay conducted a rigorous analysis of Horizon Worlds reviews. These reviews were written by verified owners of the game and were published in Meta’s own app store. Lastly, Fairplay confirmed the findings of its investigation by working with a former Meta executive-turned-whistleblower, who provided a sworn statement in support of this Request for Investigation. As detailed below, these investigations clearly establish that underage users are accessing Horizon Worlds with standard accounts, and that Meta knows it is collecting data from these users without parental consent.

### ***A. Systematic exploration of Horizon Worlds***

Fairplay conducted the first portion of its investigation by systematically exploring and documenting popular spaces in Horizon Worlds. Our researcher donned a Meta Quest 3 VR headset and created a standard account, registered to an adult, with no connected “friends” or contacts. The researcher then visited games and experiences listed in “Today’s Top 20,” which is a featured collection of popular games and experiences in Horizon Worlds. In order to guarantee a wide cross-section of potential audience compositions, these visits were spread across multiple days, weeks, and after-school hours, and each visit lasted for at least 10 minutes. At no point during the investigation did Fairplay’s researchers speak to other users or otherwise prompt users to engage in voice chat.

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[canada/?srsltid=AfmBOorhWsltjOcm59uqgd15dgw; Hk4m1bsvMCCgWciIIc16FCPOQUvD](https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf) (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>); Welcoming Pre-Teens to Horizon Worlds, Meta (April 3, 2025), [https://www.meta.com/blog/preteens-horizon-worlds-family-friendly-vr-mr/?srsltid=AfmBOoo9IkKvs\\_zIegPZWcSzq8E1j0tupvjmbELMtTts94vceVqVNC7U](https://www.meta.com/blog/preteens-horizon-worlds-family-friendly-vr-mr/?srsltid=AfmBOoo9IkKvs_zIegPZWcSzq8E1j0tupvjmbELMtTts94vceVqVNC7U) (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>39</sup>Welcoming Pre-Teens to Horizon Worlds, Meta (April 3, 2025), [https://www.meta.com/blog/preteens-horizon-worlds-family-friendly-vr-mr/?srsltid=AfmBOoo9IkKvs\\_zIegPZWcSzq8E1j0tupvjmbELMtTts94vceVqVNC7U](https://www.meta.com/blog/preteens-horizon-worlds-family-friendly-vr-mr/?srsltid=AfmBOoo9IkKvs_zIegPZWcSzq8E1j0tupvjmbELMtTts94vceVqVNC7U) (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).



*A screenshot taken from Meta Horizon Worlds menu showing the icon for “Today’s Top 20”*

During the course of Fairplay’s investigation, researchers visited the following games and/or experiences, all of which were taken from the list of “Today’s Top 20:” “Horizon Central,” “Bobber Bay Fishing,” “MetDonald’s,” “Super Rumble,” “The Office World,” “Saber,” “Creepy Cabin,” “Spin the Bottle,” “Gatsby’s Bar 18+,” “Pizza Kitchen,” “VR Classroom,” and “World Class Boxing Gym.” Fairplay conducted at least two separate visits to each game or experience for a total of 26 visits. For the Commission’s reference, a data table that highlights the findings from the investigation, along with detailed descriptions of these games and experiences, is attached as Appendix B.

As explained in detail below, Fairplay was able to determine which users were children by recording video and audio of each visit, reviewing those recordings in detail, and logging the total number of users present in each virtual space, as well as the total number of users with obvious child voices. To ensure accuracy, Fairplay required at least two researchers to separately review voice recordings taken from visits to Horizon Worlds, and used reference audio of conversations between a wide variety of children under the age of 13 as comparison data.

When two researchers independently flagged a user for speaking with the obvious voice of a person under the age of 13, Fairplay concluded that the user was a child.<sup>40</sup> Fairplay also

<sup>40</sup> To determine the total number of users present in each visit, two Fairplay researchers independently logged the number of users they witnessed in each video recording. If the two researchers’ total number of users present

specifically noted when a child self-identified as under age 13, when there were specific instances of potential harm to children, and when children interacted with Meta community guides.

Finally, it is important to note that many users within Horizon Worlds voluntarily choose not to speak, and therefore some users did not use voice chat in the presence of Fairplay researchers at all. It was also difficult to discern which users were speaking when a large group of children were gathered in close proximity to one another, and our researchers did not count a user as a child unless they were able to verify that the voice in question came from a specific avatar. Accordingly, the total number of children identified by Fairplay researchers during these visits should be considered the minimum possible number.

To illustrate how Fairplay was able to determine that the children identified in our investigation were using standard accounts, it is important to discuss how account permissions are managed in Horizon Worlds. As previously discussed, Meta now allows children as young as 10 years old to use its Quest VR headsets to access games in the Horizon ecosystem. Meta alleges that users aged 10-12 are required to have a child account, which is connected to a standard account run by their parent or legal guardian.<sup>41</sup> Through this parent account, Meta offers privacy controls, solicits parental consent, and offers safeguards to limit certain experiences and features.

Importantly, there are a number of ways that a child could easily access Horizon Worlds without a child account. Each Quest VR headset can have multiple accounts. Switching from a child account to a standard account takes only a few seconds and generally requires no parental approval. When operating a Quest VR headset, a child need only click their profile icon, select “switch account,” and then select a standard account on the device. At that point, the child can simply open the Horizon Worlds application and begin exploring games and experiences using the standard account on the headset.<sup>42</sup> Similarly, a Quest VR headset can be set up and operated without any child account in the first place. For example, an adult can set up a Quest VR headset and allow their family members to use it as a shared device with a single, standard account. Or,

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differed by 20% or more, a third researcher reviewed the video of that visit and logged their own count of total users. Fairplay then reconciled the data of researchers by using the highest number of total users reported in each visit as confirmed by at least two of its researchers – i.e., the highest reported number of total users that was double-verified. For the Commission’s reference, the data collected is attached as Appendix B and C.

<sup>41</sup> Welcoming Pre-Teens to Horizon Worlds, Meta (April 3, 2025), [https://www.meta.com/blog/preteens-horizon-worlds-family-friendly-vr-mr/?srsltid=AfmBOoo9IkKvs\\_zIegPZWcSzq8E1j0tupvjmbELMtTs94vceVqVNC7U](https://www.meta.com/blog/preteens-horizon-worlds-family-friendly-vr-mr/?srsltid=AfmBOoo9IkKvs_zIegPZWcSzq8E1j0tupvjmbELMtTs94vceVqVNC7U) (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>42</sup> Add, Remove, and Switch Between Multi-User Accounts, Meta (April 9, 2025), <https://developers.meta.com/horizon/documentation/unreal/ts-odh-multiuser/> (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>); as further explained below, children are drawn to the social nature of the metaverse. In fact, many of the most popular games and experiences within Horizon Worlds are nothing but virtual spaces for children to gather and communicate with strangers. Because of this fact, it is not surprising that many children choose to circumvent child account protections and utilize standard accounts to explore the platform.

with access to an email inbox and the Meta app, a child can simply set up their own standard account by providing a false birthdate.

Meta has limited the ways in which users with child accounts can explore and interact in Horizon Worlds. But the specific limitations Meta has placed on child accounts' access to Horizon Worlds have changed over time. Prior to November 25, 2024, users aged 10-12 with child accounts were fully prohibited from accessing Horizon Worlds. This means that when a user with a child account attempted to access Horizon Worlds, Meta entirely prevented them from doing so, either by not allowing the child account to download the application, or by notifying the user of that child account that the game can only be accessed with a standard account.

After November 25, 2024, Meta began allowing child accounts to access Horizon Worlds with certain restrictions. According to Meta's updated policy, child accounts require parental approval to explore certain games and experiences, and they are equipped with additional safety features.<sup>43</sup> Most importantly, child accounts accessing Horizon Worlds can only communicate by voice chat with other users that are specifically approved by the parent associated with the account. So while a user under age 13 can now enter Horizon Worlds with a child account, that user cannot hear or speak to any other users on the platform unless those users are pre-approved as contacts by the child's parent or guardian. Likewise, a user exploring Horizon Worlds with a standard account cannot hear the voice of any user with a child account, unless that standard account is an approved contact of a specific child account.

Based on Meta's account policies, Fairplay was able to determine that the child users identified during its investigation were using standard accounts, both before and after November 25, 2024. As discussed above, Fairplay explored Horizon Worlds with a newly created standard account, with no friends or contacts, and identified child users by recording and analyzing their voice communications. Any time before November 25, 2024, if a Fairplay researcher identified a child exploring Horizon Worlds, that child *must* have been using a standard account because child accounts were strictly prohibited from accessing the platform in the first place. Any time after November 25, 2024, if a Fairplay researcher identified a child exploring Horizon Worlds, that child *must* have been using a standard account because child accounts are not capable of communicating through voice chat with users who are not approved contacts, and our researcher was not the approved contact of any child.

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<sup>43</sup> Introducing New Parent-Managed Meta Accounts for Families, Meta (April 3, 2025), <https://www.meta.com/blog/meta-accounts-parent-managed-families/?srsltid=AfmBOorW0FyRHB7TGao7JV7aHmvNJrZO4hsSQdeDbki5qyIOa313Q-zF> (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>); Welcoming Pre-Teens to Horizon Worlds, Meta (April 3, 2025), [https://www.meta.com/blog/preteens-horizon-worlds-family-friendly-vr-mr/?srsltid=AfmBOoo9IkKvs\\_zlegPZWcSzq8E1j0tupvjmbELMtTts94vceVqVNC7U](https://www.meta.com/blog/preteens-horizon-worlds-family-friendly-vr-mr/?srsltid=AfmBOoo9IkKvs_zlegPZWcSzq8E1j0tupvjmbELMtTts94vceVqVNC7U) (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).



To verify these facts, Fairplay conducted a test session wherein researchers created a child account for a user under the age of 13, and a separate standard account for a user over the age of 13. These accounts were not connected, meaning the standard account was not an approved contact for the child account. Researchers then met one another in the same virtual space within Horizon Worlds. During that visit, the child account was unable to speak to, or hear from, any other users present in the space, including Fairplay’s standard account. Likewise, the standard account was unable to hear any communication from the child account.

Most importantly, Fairplay’s standard account *was* able to hear voice communications from several other users during the session, and at least one of those other users had the obvious voice of a child under the age of 13. This confirms that underage users that were identified during Fairplay’s investigation through analysis of their voice communications *must* have been accessing Horizon Worlds with standard accounts. This is consistent with Meta’s account permission structure and verifies that the results of the investigation are a valid and accurate representation of the number of children exploring Horizon Worlds with standard accounts.

### ***B. The substantial presence of underage users accessing Horizon Worlds with standard accounts***

After completing the first phase of our investigation by systematically exploring Horizon Worlds, Fairplay researchers confirmed that a substantial percentage of users on the platform are underage children operating with standard accounts. A summary of the results of the investigation can be found in Appendix B. Here are some of the findings:

- Fairplay encountered child users in every game or experience except “Gatsby’s Bar 18+” and “Super Rumble.” That means there were children using standard accounts in 10 out of 12 games and experiences visited.<sup>44</sup>
- Fairplay encountered child users exploring Horizon Worlds with standard accounts in 22 out of 26 visits. That means there were children present using standard accounts in nearly 85% of Fairplay’s visits in Horizon Worlds.<sup>45</sup>
- Fairplay encountered a total of 510 users throughout the course of its investigation. Of those 510 users, 170 were flagged as children using standard accounts. Based on this data, 33% of all users Fairplay researchers encountered in Horizon Worlds’ Top 20 games and experiences were children.<sup>46</sup>

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<sup>44</sup> Researcher Video Logs, Appendix B.

<sup>45</sup> *Id.*

<sup>46</sup> *Id.*

- Underage users were found using standard accounts in visits that occurred both before and after Meta’s November 2024 decision to grant child accounts access to Horizon Worlds. This indicates that children continue accessing Horizon Worlds with standard accounts, rather than with child accounts, despite Meta’s November 2024 policy change.<sup>47</sup>

Fairplay researchers also found that a high number of the total users encountered in Horizon Worlds remained silent, with their microphones turned off. As a result, children often made up the vast majority of users that could actually be heard speaking. This sometimes created an overwhelming sense that certain games and experiences are filled almost entirely with screaming children. Simply put, the substantial presence of children exploring Horizon Worlds with standard accounts was impossible to miss.

This is similarly reflected in the high percentage of child users present in certain games and experiences that are particularly attractive to children. For example, Fairplay discovered that at least 52% of all users within “VR Classroom” are children using standard accounts.<sup>48</sup> In one visit to “VR Classroom,” 20 out of 27 users present had obvious child voices.<sup>49</sup> It was the same in “Spin the Bottle,” where 55% of users were children, and in “Pizza Kitchen,” where at least 52% were children.<sup>50</sup>



*Left: A screenshot taken from “Pizza Kitchen”  
 Middle: A screenshot taken from “VR Classroom”  
 Right: A screenshot taken from “Spin the Bottle”*

Fairplay also encountered a significant number of exceedingly young users whom our researchers estimated to be under 10 years old. In one visit to “Spin the Bottle,” a user specifically indicated that he was 9 years old.<sup>51</sup> In a visit to “Horizon Central,” a different user is heard laughing with the voice of a very young child, perhaps no older than five years old. When chatting with a Meta community guide, the user giggled and said, “I’m getting tickled!”<sup>52</sup> Fairplay found more than 10 users in various visits with childish speech patterns suggesting they could be as young as

<sup>47</sup> *Id.*, See also Researcher Data Reconciliation Table, Appendix C.

<sup>48</sup> Researcher Video Logs, Appendix B.

<sup>49</sup> Researcher Data Reconciliation Table, Appendix C, at VRC1-1, VRC1-2.

<sup>50</sup> Researcher Video Logs, Appendix B.

<sup>51</sup> Researcher Video Logs, Appendix B, at SB1.

<sup>52</sup> Researcher Video Logs, Appendix B, at HC3.

six or seven years old.<sup>53</sup> As a result of these findings, it is clear that a substantial number of children under the age of 13 are accessing Horizon Worlds using standard accounts, and that Meta cannot credibly claim that it lacks actual knowledge of their presence.

Finally, Fairplay’s research establishes that Meta’s November 2024 decision to allow child accounts to access Horizon Worlds has not reduced the number of underage users exploring the platform using standard accounts. In fact, it appears the problem may actually be getting worse. As part of its investigation, Fairplay visited several games and experiences in Horizon Worlds as recently as April 7, 2025. Of all the users researchers encountered during these April 2025 visits, 44% were flagged as children under the age of 13 based on their child-like voices.<sup>54</sup> This means the overall percentage of users flagged as underage children using standard accounts during our Fairplay’s visits actually *increased* during the course of the investigation.

### ***C. Meta community guides***

In addition to uncovering the substantial number of children using standard accounts in Horizon Worlds, Fairplay discovered that live Meta employees are frequently present on the platform, and that those employees regularly interact with users who are obviously children. Meta states that “community guides” are “employed by Meta to help elevate the Horizon Worlds experience.”<sup>55</sup> They welcome users into virtual spaces, highlight newly available experiences, and are generally “around to help make [a user’s] experience enjoyable.”<sup>56</sup> Community guides can be easily identified by the teal badge found on their name tags.<sup>57</sup>

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<sup>53</sup> Researcher Video Logs, Appendix B, at BB1, HC2, HC3, MD2, SB1, PK2, S1, OW1.

<sup>54</sup> See Researcher Data Reconciliation Table, Appendix C, at GB2, OW2, PK1, S2, WCB2.

<sup>55</sup> Moderators and Community Guides, Meta (April 1, 2025), [https://www.meta.com/help/quest/articles/horizon/safety-and-privacy-in-horizon-worlds/community-guides-in-horizon/?srsltid=AfmBOophGLsbvcvfpd4a4m2cmZaNrgMWETzHQnC\\_2U1kpMsfxMS1iIF](https://www.meta.com/help/quest/articles/horizon/safety-and-privacy-in-horizon-worlds/community-guides-in-horizon/?srsltid=AfmBOophGLsbvcvfpd4a4m2cmZaNrgMWETzHQnC_2U1kpMsfxMS1iIF) (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>56</sup> *Id.*

<sup>57</sup> *Id.*



*A screenshot taken from “Horizon Central” showing a Meta community*

They can also “issue warnings and remove people if they see inappropriate behavior,” and can flag “trained safety specialists” who can review reported issues.<sup>58</sup>

Fairplay encountered six different community guides during its investigation. Each time, they were stationed within “Horizon Central,” cheerfully announcing “welcome in” whenever a new user arrived.<sup>59</sup> On multiple occasions, community guides prompted our researcher to turn on their microphone upon entering the experience.<sup>60</sup> Community guides regularly struck up conversations with users, a substantial number of who were obviously children using standard accounts. Accordingly, these Meta employees were directly aware that children were improperly accessing Horizon Worlds, and, despite having the ability to alert Meta’s “trained safety specialists,” these community guides willfully allowed children to remain on the platform despite continuing risks to their safety and privacy.

In a visit recorded on November 10, 2024, a community guide named “sharkbite5050” regularly interacted with a group of children, taking the informal tone of a kind babysitter or kindergarten teacher.<sup>61</sup> When one child user asked whether she is an employee of Meta, she responded: “yeah, what’s up?”<sup>62</sup> Later, a very young child using a standard account was heard

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<sup>58</sup> *Id.*

<sup>59</sup> Researcher Video Logs, Appendix B, at HC1, HC3, HC4.

<sup>60</sup> *Id.* at HC1, HC1.

<sup>61</sup> *Id.* at HC3.

<sup>62</sup> *Id.*

giggling. Sharkbite5050 approached the child and said “are you ok, you sound like you are being tickled!” The child responded by saying “I’m getting tickled, yeah,” while still giggling uncontrollably. Sharkbite5050 laughed off the experience with a sweet tone of voice, saying “you might want to mute yourself while you are being tickled buddy.” Later, sharkbite5050 fielded questions from an adult user who was looking for more mature experiences. In response, sharkbite5050 openly acknowledged the obvious presence of children in Horizon Worlds, telling the adult user that he should seek out 18+ experiences “because you know, there are children on this platform[.]”<sup>63</sup>

In another visit, a community guide named “bingbongo\_o\_0” was stationed at the entrance to “Horizon Central,” welcoming new users and prompting them to turn on their microphones.<sup>64</sup> A separate community guide named “pandorasthoughts” answered a number of questions from a precocious group of obvious children using standard accounts.<sup>65</sup> In response to a question about her role, pandorasthoughts said, “we are employed through Meta to be here to help you guys... I get paid to do this.”<sup>66</sup> She also told the children that she has the ability to “ban people” but does not like to do so, and that community guides can be easily found because they “should be in every session.”<sup>67</sup> At another point, a user with the voice of a very young child, likely less than six or seven years old, attempted to discuss her age. Pandorasthoughts immediately admonished the child, stating “we don’t want to ask people how old they are ... It actually goes against the terms and conditions that you guys agreed to when you put the headset on ... if you want a reminder you can go to meta.com and read those there.”<sup>68</sup> Not only did the community guides Fairplay researchers observed encounter users who were obviously young children using standard accounts – seemingly without intervening at all – but these Meta employees also encouraged this particular user not to share her age.

### III. Analysis of Horizon Worlds reviews

For the second phase of its investigation, Fairplay conducted a thorough analysis of Horizon Worlds customer reviews, all of which were published in Meta’s own app store. Meta only publishes reviews from “verified users” of Horizon Worlds, that is, users who have “purchased, obtained or redeemed [the] app through the Quest Store or App Lab, and [have] used the app.”<sup>69</sup> Accordingly, these reviews are an accurate reflection of genuine user experiences on the platform.

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<sup>63</sup> *Id.*

<sup>64</sup> Researcher Video Logs, Appendix B, at HC4.

<sup>65</sup> *Id.*

<sup>66</sup> *Id.*

<sup>67</sup> *Id.*

<sup>68</sup> *Id.*

<sup>69</sup> Meta Quest: Verified app user reviews, Meta (July 29, 2024), [https://www.meta.com/legal/quest/verified-user-reviews/?utm\\_source=www.meta.com&utm\\_medium=dollyredirect](https://www.meta.com/legal/quest/verified-user-reviews/?utm_source=www.meta.com&utm_medium=dollyredirect) (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

Fairplay analyzed hundreds of reviews of Horizon Worlds published in Meta’s app store for a period of nearly six months, from July 1, 2024 to December 9, 2024. Fairplay manually screened each review and flagged any entries that expressly mentioned the presence of children. Fairplay also screened the reviews for comments alluding to risks of harm for children, such as cyberbullying and sexual predation. For the Commission’s reference, a summary of Fairplay’s review analysis, along with a selection of relevant screenshots, is attached to this Request for Investigation as Appendix E.

To reiterate, users in Horizon Worlds are not able to hear voice communication from someone operating with a child account unless they are one of the parent-approved contacts on that child account. It follows that when a user writes a review of Horizon Worlds indicating that they have witnessed the widespread presence of children on the platform, the children whom that user encountered are not among the reviewer’s approved contacts and must have been using standard accounts.

Based on the reviews analyzed by Fairplay, it is undeniable that Meta knows that a substantial number of underage users are accessing Horizon Worlds with standard accounts. In total, verified users published approximately 626 reviews on Horizon Worlds from July 1, 2024, until December 9, 2024. Of those 626 reviews, 112 specifically mention the obvious presence of children. That is nearly 18% of all published reviews.

A closer examination of the analyzed reviews underscores just how substantial and obvious the presence of children is within Horizon Worlds. One review mentions “the plague of children.”<sup>70</sup> Others called the platform a “nursery” and a “daycare.”<sup>71</sup> Some say the game has [f]ar too many streaming 6 year olds,” or that you cannot explore the platform without being “surrounded by children.”<sup>72</sup> One review states that many children are “100% below the min[imum] age of 13,” and another reviewer said the game is “all children, and that they have only found ‘a handful of adults.’”<sup>73</sup>

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<sup>70</sup> Analysis of Horizon Worlds’ Reviews with Screenshots, Appendix E, at 1.

<sup>71</sup> *Id.* at 16, 18

<sup>72</sup> *Id.* at 5, 8.

<sup>73</sup> *Id.* at 9, 15.

Too many underage kids on here

★ ★ ★ ☆ ☆ 15 days ago

Get rid of all the minors. Too many of them, 100% below the min age of 13. Doing a lot of swearing and sexual talk. Adults being appropriate. The "kids" are not.



Scott Helpful | 0

All Children

★ ☆ ☆ ☆ ☆ 14 Jul at 09:56

The world's are cool and everything but in three months I've spoken to only a handful of adults. I really wish there was an over 18 setting for the world's because all the children are why I don't visit these world's anymore. Both annoying and feel like a creeper. How hard can it be to age verify with ID or a credit card or something and set your preferences to "adult only" for interactions.

[See less](#)

In addition, many of the reviews specifically mention the ages of the children they are encountering. One described a child user saying: "I swear to god one sounded like a toddler."<sup>74</sup> Another said, "[A]lmost all of the players in the games are 5-11 year olds."<sup>75</sup> Another said, "the amount of 6 year olds in this game is insane!"<sup>76</sup> One particular user succinctly described Horizon Worlds as "lots of 2 year olds saying the n word."<sup>77</sup>

In other situations, reviewers identify themselves as under age 13. One child user said they do not like hearing inappropriate things "as a 9 year old."<sup>78</sup> Another child user said the game was good for "kids like me," but complained that adults try to do "weird stuff" with "10 year old kids."<sup>79</sup>

Great app, terrible players

★ ★ ★ ★ ☆ 28 Jul at 20:49

Almost all of the players in the games are 5-11 year olds, the maps and games are great but the experience gets ruined when a small child is screaming at me.



Blainethebozo Helpful | 3

<sup>74</sup> *Id.* at 16.

<sup>75</sup> *Id.* at 13.

<sup>76</sup> *Id.* at 10.

<sup>77</sup> *Id.* at 11.

<sup>78</sup> *Id.* at 28.

<sup>79</sup> *Id.* at 29.

Annoying, full of kids, waste

...

★ ☆ ☆ ☆ ☆ 12 Jul at 18:01

Everything to do with horizon is annoying. The two times I tried worlds, every space was filled with children, annoying and petulant little kids - I swear to god one sounded like a toddler. How can anyone enjoy a chance at a game when it's nothing but immature, screaming kids who probably have some of the most irresponsible parents on the planet. Horizon worlds and the horizon feed are useless and I wish I could remove the feed and never have to see the app again. I'll never be using worlds again, unless they make a setting where you can AVOID people under a certain age. Meta needs to make this app better so people can be around those their own age, not kids. Parents also need to do a better job at BEING PARENTS.

[See less](#)

Finally, a high number of reviews specifically address Meta’s lack of accountability in preventing children from entering Horizon Worlds with standard accounts. Users emphasized the unique risks to children’s privacy and safety posed by the platform, the violation of applicable privacy laws, Meta’s disregard for its own terms of service, and the belief that Meta is doing nothing to solve the problem. One user specifically mentions that “children should not be allowed” and that “the moderation team should be actively finding and banning accounts that are being used by those under 13.”<sup>80</sup> Another user reported that many adults are “fed up with the lack of oversight,” and implored Meta to “[enact] a plan to combat this behavior and monitor age restricted worlds.”<sup>81</sup>

Parents BE WARNED!!!

...

★ ★ ☆ ☆ ☆ A day ago

Ok, I have been playing Horizon Worlds for a long time it was great fun. Now, unfortunately, it seems to be consistent flooded with underage kids and unlawful behavior. Many of the world's are created for pure adults and not suitable for children. Some of the world places don't bother to put a password or administrative person in place to block underage users from entering adults only zones. I've consistently had to report individuals for violations, but most of the 6 reports do nothing. Offensive players consistently don't get banned even when the rule breaking is blatantly done. I think both META AND Horizon worlds admits needs to take a stronger role monitoring and enforcement of the rules...

[See less](#)



Dragonias

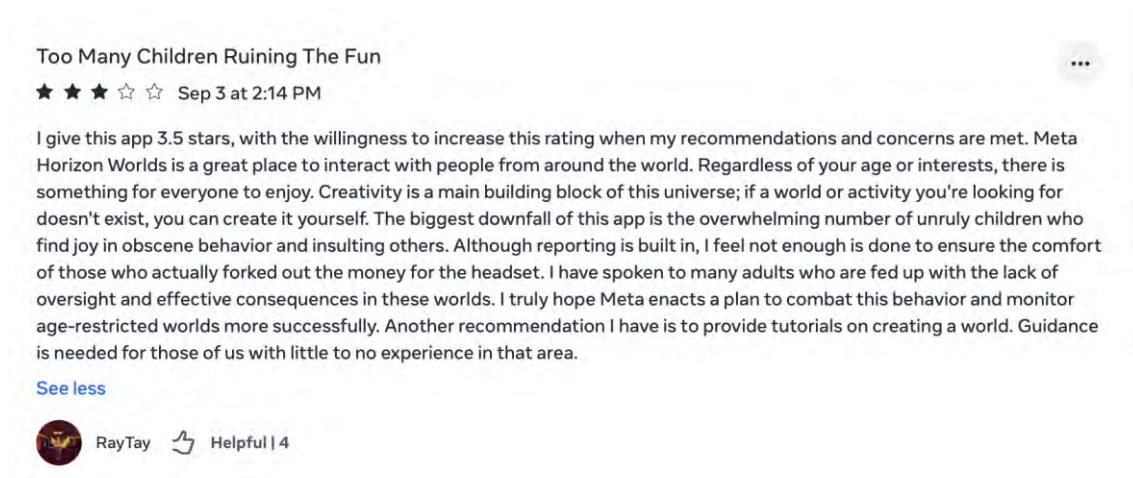


Helpful | 0

<sup>80</sup> *Id.* at 7.

<sup>81</sup> *Id.* at 22.





These reviews' overwhelming focus on the number and age of children on the platform, as well as the serious risks adults pose to children, leave no doubt that Meta has repeatedly been put on notice about child users in Horizon Worlds.

#### **IV. The sworn statement of former Horizon Worlds Director of Product Marketing, Kelly Stonelake, confirms that Meta knows children under 13 are accessing Horizon Worlds using standard accounts.**

Following the completion of its investigation, Fairplay learned from publicly available reporting that Kelly Stonelake, a former Meta executive who worked directly on Horizon Worlds, was alleging that Meta previously disregarded the presence of underage users on the platform. Fairplay contacted Ms. Stonelake to help verify the findings in this Request for Investigation. As a result, Ms. Stonelake provided Fairplay with a sworn statement in which she details how Meta executives jeopardized the privacy and safety of underage users.<sup>82</sup> Ms. Stonelake's testimony confirms that, during her tenure on the Horizon Worlds team from July 2022 through January 2023, Meta executives knew that users under the age 13 were using Horizon Worlds without COPPA protections. Further, her testimony confirms that Meta attempted to avoid its responsibilities under COPPA in order to prioritize the growth of Horizon Worlds. A copy of Ms. Stonelake's sworn statement is attached as Appendix A. The following details are all drawn from that statement.

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<sup>82</sup> Sworn Statement of Kelly Stonelake, Appendix A.

***A. Kelly Stonelake’s role at Meta gives her firsthand knowledge of the development and operation of Horizon Worlds.***

Ms. Stonelake had a long and successful career at Meta. She started working at the company in 2009 and rose to become the Director of Product Marketing for Developer Platform and Horizon Worlds by July 2022. In this role, Ms. Stonelake had “deep visibility” into relevant aspects of Horizon Worlds, including internal product performance, safety risks, and regulatory compliance. Ms. Stonelake’s sworn statement details the information that PMMs at Meta are expected to track and manage, including: product mission and vision; research insights; launch strategy; business goals, revenue forecasts, and success metrics; communications and PR strategy; and regulatory and privacy risks and mitigation strategies. When safety or privacy violations surfaced in Horizon Worlds – especially those that could impact users, regulatory obligations, developers, or Meta’s brand – identifying, assessing, and intervening to mitigate those risks was squarely within Ms. Stonelake’s scope of work. Ms. Stonelake worked on Horizon Worlds until going on medical leave in January 2023.

***B. It was common knowledge among Meta leadership that underage users were improperly accessing Horizon Worlds.***

According to Ms. Stonelake’s sworn statement, “it was a widely known issue that children (including users under the age of 13) were accessing Horizon Worlds by misrepresenting their ages, logging in with accounts registered as adults, [and] thereby bypassing age-related restrictions.” From the outset of her work as Director of Product Marketing on Horizon Worlds, it was clear that Meta executives knew that users under the age of 13 were accessing the platform and that young users’ presence was creating significant legal risk for the company. Ms. Stonelake’s statement lays out several instances in which the presence of underage users in Horizon Worlds was acknowledged by or openly discussed in the presence of Meta leadership. For example:

- During Ms. Stonelake’s initial onboarding process in July 2022, Meta Product Marketing Manager Meaghan Fitzgerald admitted that children are present in Horizon Worlds and that this fact causes risks to the business. Ms. Fitzgerald also informed Ms. Stonelake in a subsequent meeting that teens and young adults were the most important strategic priority for Horizon Worlds, and that Mark Zuckerberg and Andrew Bosworth wanted to shift the narrative from “Meta is responsible for everything,” to “we provide people controls,” as a way to deal with the complexity of online privacy regulations;
- In November 2022, Ms. Stonelake hosted a roundtable discussion with Meta leadership and certain third-party game and experience creators. During this discussion, several third-party creators explicitly stated that an influx of underage

users into their games and experiences posed significant challenges to maintaining safe communities in Horizon Worlds. Panelists and audience members included a wide range of leadership personnel from across various Meta teams, including Brett Vogel, Meta Vice President of Product Marketing; Vidita Subbarao, with Meta Social Impact; Joe Mancini, with Meta Reality Labs Trust; Ashley Miles, with Meta Avatars and Identity; and Jeremy Sharff, with Meta Horizon.

- Beginning October 31, 2022, Ms. Stonelake participated in several “playtests,” wherein she and several other Meta executives would personally explore Horizon Worlds using VR headsets. During these playtests, Meta executives struggled to have basic conversations because of the high number of disruptions from children with “very young, high pitched children’s voices.” Several Meta executives participated in these playtests, including Gabe Aul, Vice President of Meta Reality Labs Product and Engineering; Vishal Shah, Meta’s Vice President of Metaverse; Brett Vogel, then-Meta Vice President of Product Marketing; and Jeff Lin, then-Meta’s Game Director and Product Design Director for Metaverse. Based on their experience with disruptive children on the platform, Meta executives determined to hold later playtests in private spaces within Horizon Worlds, so as not to be bothered by underage users.
- On August 23, 2022, a Meta employee named Karon Wheeler posted details in an internal workplace forum, recounting instances in which underage users disrupted virtual cooking experiences in Horizon Worlds. Mr. Wheeler further described spaces in Horizon Worlds that are populated with young people who persistently use profanity and racial slurs. This internal workplace forum was visible to Meta leadership, and Ms. Stonelake distributed copies of Mr. Wheeler’s comments to Meta executives prior to the above-referenced roundtable discussion.
- During Ms. Stonelake’s tenure at Horizon Worlds, several external media sources highlighted concerns regarding underage users accessing the platform. These external media reports were circulated and discussed regularly by Ms. Stonelake and other Meta employees. For example, Meta’s Product Team specifically circulated an October 2022 report from the New York Times that detailed the extent to which Horizon Worlds is populated by children, featured an anecdote about finding an 11-year-old child on the platform, and explained that Meta community guides only remove users under age 13 if those users explicitly reveal their age.<sup>83</sup>

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<sup>83</sup> See Kashmir Hill, *This Is Life in the Metaverse*, New York Times (Oct. 7, 2022), <https://www.nytimes.com/2022/10/07/technology/metaverse-facebook-horizon-worlds.html>.

- Similarly, in December 2022 Horizon Worlds leadership circulated and discussed the FTC’s lawsuit against Epic Games for violations related to children’s data.

This evidence from Ms. Stonelake demonstrates a widespread awareness among Meta and Horizon Worlds leadership that children under 13 were regularly using the platform, and that their presence created undeniable safety and compliance risks.

***C. Meta ignored the presence of minors and prioritized growth of Horizon Worlds over the privacy and safety of underage users.***

Despite being fully aware that children under the age of 13 were regularly accessing Horizon Worlds, Meta executives decided to prioritize growth of the platform rather than address risks to the privacy and safety of its young users. According to Ms. Stonelake, Meta suffered significant disruptions to its ad revenue following an update to Apple iOS 14’s privacy features, which limited the effectiveness of targeted ads. As a result, executives at Meta attempted to generate new revenue streams from its Metaverse initiatives as quickly as possible. Ms. Stonelake describes a culture where “product strategy was being shaped not around safeguarding children, but around legal minimization and reputational risk.”

According to Ms. Stonelake’s statement, Meta leadership attempted to dodge legal accountability by implementing “a general directive” to avoid documenting concerns about the overwhelming presence of underage users in Horizon Worlds. For example, Meta executives Jeff Lin, Brett Vogel, Kartik Santhanakrishnan, Yoav Shapira, Joe Bentley, and Vishal Shah directed Ms. Stonelake on different occasions not to document conversations or decisions related to users under the age of 13 due to “legal risks.” Similarly, Ms. Stonelake noted that Meta leadership switched from using the acronym “TAYA” (“teens and young adults”) to the acronym STAYA (“stated teens and young adults”). She says this change potentially indicates Meta’s acknowledgment that it was relying on unverified, self-reported ages for its users.

Ms. Stonelake also reports that Meta executives intentionally avoided communicating about underage users in written communications to one another. In one status tracker, Meta executives discussed the potential legal risks of deploying an age prediction algorithm in Horizon Worlds, but specifically stated in the email: “not listing details here.”

Ms. Stonelake describes an environment where employees were discouraged from discussing underage users, as well as safety and privacy risks in Horizon Worlds. She reports that Kerry Antos, then a senior Marketing Director at Meta, raised objections to launching major marketing campaigns for Horizon Worlds amid “rampant product and safety concerns.” Specifically, Ms. Antos was concerned that the presence of children in Horizon Worlds would cause issues with Meta’s advertising promises and lead to public relations and legal backlash.

When Ms. Stonelake relayed Ms. Antos’s concerns to Meta executive Jeff Lin (Game Director and Product Director), he instructed her to suppress them. Ms. Stonelake says Mr. Lin specifically asked her how fast she could “shut her up” – referring to Ms. Antos – and positioned his demand as a reflection of Ms. Stonelake’s work performance, saying “now let’s see if you’re as good as they say you are.” When Ms. Stonelake continued to raise these concerns to leadership anyway, she was excluded from subsequent meetings.

As the person responsible for ensuring a successful go-to-market strategy for Horizon Worlds, Ms. Stonelake often encountered situations in which her team uncovered inadequate safety or privacy monitoring tools, or where her team felt uncomfortable implying that Meta was complying with relevant regulatory requirements. In those instances, Ms. Stonelake was told that Meta’s privacy and trust teams would develop adequate solutions, but was otherwise excluded from critical discussions. Similarly, when Ms. Stonelake specifically raised concerns about underage users or a lack of adequate parental control features, she was told that discussions needed to remain confidential because of legal sensitivities and was refused access to privileged documents, despite regularly having access to privileged documents related to her work.

Ms. Stonelake’s statement makes clear that Meta leadership treats the presence of underage users in Horizon Worlds as an afterthought, despite repeated warnings from employees, creators, and users. Rather than address the issue as a serious risk to the safety and privacy of young users, Meta instructed employees not to formally document their concerns. As such, Ms. Stonelake warns that Meta’s public statements about age verification and the safety and privacy of Horizon Worlds cannot be taken at face value. As detailed below, Fairplay’s investigation and Ms. Stonelake’s testimony clearly establish that Meta has repeatedly violated COPPA by knowingly allowing users under the age of 13 to access Horizon Worlds, and it continues to do so to this day.

## **V. Meta is Violating COPPA by knowingly collecting vast amounts of personal information from children under 13 without parental consent in Horizon Worlds.**

Fairplay’s investigation establishing the ongoing, widespread presence of children under 13 exploring Horizon Worlds with standard accounts is evidence of COPPA violations occurring before the November 25, 2024 policy change and continuing to this day. COPPA makes it “unlawful for any operator of a Web site or online service directed to children, or any operator that has actual knowledge that it is collecting or maintaining personal information from a child, to collect personal information from a child” unless it complies with certain requirements.<sup>84</sup>

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<sup>84</sup> 16 C.F.R. §312.3.

Specifically, the operator must give parents notice of its data collection practices, and obtain verifiable parental consent before collecting the data.<sup>85</sup>

***A. Meta is collecting personal information from children under the age of 13 without parental consent.***

Meta is collecting copious amounts of personal information from users under the age of 13 without parental consent. As detailed above, Fairplay’s investigation established that a substantial number of children are accessing Horizon Worlds with standard accounts. Because these children are accessing the platform with standard accounts, they are subject to the data collection practices for adults detailed in Meta’s privacy policies. This includes the collection, retention, and storage of personal information expressly covered under COPPA, such as the child’s IP address, location information, audio recordings of the child’s voice, biometric information such as gaze and retinal data, and much more.<sup>86</sup> In addition, all of this personal information is collected without verified parental consent, as Meta only obtains parental consent for data collection on accounts registered to children under 13.

As detailed in Meta’s privacy policies, the company collects sensitive personal information through its VR/XR headsets. This includes biometric data – including retinal scans, eye tracking data, and movement analysis – and location data.<sup>87</sup> At a minimum, when Meta collects this data from children without parental consent, it places those children at risk for data breach, unauthorized use, or improper transfer to a host of marketers, data brokers, SDKs, government agencies, and other third parties. As Chair Ferguson emphasized with respect to the FTC’s 2024 Social Media and Video Streaming Services Report, “This massive collection, repackaging, sharing, and retention of our private and intimate details puts Americans at great risk.”<sup>88</sup>

***B. Meta has actual knowledge that it is collecting personal information from underage users in Horizon Worlds without parental consent.***

Fairplay’s investigation has also established that Meta has actual knowledge that it is collecting personal information from underage users accessing Horizon Worlds with standard accounts. The Commission has stated that COPPA “demands enforcement of meaningful

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<sup>85</sup> 16 C.F.R. §312.3(b).

<sup>86</sup> Supplemental Meta Platforms Technologies Privacy Policy, Meta (March 31, 2025), [https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk\\_cj](https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk_cj) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>87</sup> *Id.*

<sup>88</sup> *Concurring and Dissenting Statement of Commissioner Andrew N. Ferguson Regarding the Social Media and Video Streaming Services Report Commission File No. P205402* at 2 (Sept. 19, 2024), [https://www.ftc.gov/system/files/ftc\\_gov/pdf/ferguson-statement-social-media-6b.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/ferguson-statement-social-media-6b.pdf).

substantive limitations” on the collection, use, and retention of children’s data.<sup>89</sup> Operators cannot skirt their obligations under the act by constructing a so-called “veil of ignorance,” or by ignoring or avoiding actual knowledge of child users.<sup>90</sup> Even if an operator does not confirm the exact age of its users, the Commission will “examine closely” whether that operator has collected “age identifying information” sufficient to impute actual knowledge.<sup>91</sup>

For example, in its 2019 Complaint against Musical.ly (predecessor to TikTok), the Commission determined that Musical.ly had actual knowledge sufficient to trigger COPPA enforcement where “[t]he youth of the user base [was] easily apparent in perusing users’ profile pictures and in reviewing users’ profiles[.]”<sup>92</sup> Similarly, in its 2022 Complaint against Epic Games, the Commission noted that Epic obtained actual knowledge of underage users through “empirical evidence about ... player demographics,” and because Epic employees received information containing “indicia” that suggest a user or users may be under the age of 13.<sup>93</sup>

While exploring and analyzing Horizon Worlds, Fairplay observed the obvious presence of underage children on the platform and was able to determine that those underage users were accessing the platform with standard accounts based on Meta’s own publicly available policies, as described in Section II. All of the information and observations we used to make our determinations are available to the public, and of course Meta itself. In fact, Fairplay’s investigation shows that even a cursory visit to one of the platform’s Top 20 games and experiences would almost certainly reveal the presence of underage users operating with standard accounts. It is simply unbelievable that none of Meta’s employees or agents have ever witnessed the easily apparent youth of Horizon Worlds’ user base. As can be heard in the recordings generated during Fairplay’s investigation, many users on the platform speak with voices of children so young that pretending not to know those users are under 13 requires the type of “veil of ignorance” that the Commission warned against.<sup>94</sup>

Further, Meta cannot claim that its own employees and/or agents have not seen or heard underage users on the platform. As explained above, Meta staffs games and experiences in Horizon Worlds with community guides. These community guides are employed by Meta to “elevate the

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<sup>89</sup>*Policy Statement of the Federal Trade Commission on Education Technology and the Children’s Online Privacy Protection Act* (May 19, 2022), [https://www.ftc.gov/system/files/ftc\\_gov/pdf/Policy%20Statement%20of%20the%20Federal%20Trade%20Commission%20on%20Education%20Technology.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/Policy%20Statement%20of%20the%20Federal%20Trade%20Commission%20on%20Education%20Technology.pdf).

<sup>90</sup> Children’s Online Privacy Protection Act Rule NPRM, 64 Fed. Reg. 59888, 59893 (Proposed Nov. 3, 1999).

<sup>91</sup> *Id.* at 59892.

<sup>92</sup> Complaint for Civil Penalties, Permanent Injunction, and Other Equitable Relief, ¶ 28, *United States of America v. Musically et al.*, No. 2:19-cv-1439 (C.D. Cal. Feb. 27, 2019);

[https://www.ftc.gov/system/files/documents/cases/musical.ly\\_complaint\\_ecf\\_2-27-19.pdf](https://www.ftc.gov/system/files/documents/cases/musical.ly_complaint_ecf_2-27-19.pdf)

<sup>93</sup> Complaint for Permanent Injunction, Civil Penalties, and Other Relief, ¶¶ 29-30, 57, *United States of America v. Epic Games, Inc.*, No. 5:22-CV-00518 (E.D.N.C. Dec. 19, 2022);

[https://www.ftc.gov/system/files/ftc\\_gov/pdf/2223087EpicGamesComplaint.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/2223087EpicGamesComplaint.pdf)

<sup>94</sup> See 1999 Children’s Online Privacy Protection Act Rule NPRM at 59893.

Horizon World experience.”<sup>95</sup> They are trained to issue warnings, remove problematic users, and flag Meta safety specialists whenever they witness issues or concerns.<sup>96</sup> Fairplay’s investigation revealed that community guides frequently interact with underage users in Horizon Worlds. As detailed in Section II(C) above, Fairplay researchers recorded multiple community guides speaking directly with groups of underage children in November 2024, and again months later in February during a follow-up visit.

Other Meta employees have access to recordings that almost certainly reveal the presence of children using the platform without COPPA protections. Meta admits in its Supplemental Platform Privacy Policy that the last few minutes of every user’s most recent audio and video interactions in Horizon Worlds are recorded and saved for review by Meta employees.<sup>97</sup> Meta states that these recordings are reviewed by “trained safety specialists” whenever an incident is reported. Considering that Fairplay’s investigation revealed the obvious presence of underage users in nearly 85% of visits to Horizon Worlds, it would be almost impossible for these “trained safety specialists” not to have reviewed audio and video footage containing underage users clearly using the standard accounts that lack COPPA protections.

The fact that users under the age of 13 are accessing Horizon Worlds with standard accounts is obvious and apparent to nearly anyone who spends time on the platform. Fairplay’s investigation documented a high percentage of verified customer reviews of the platform specifically mentioning the presence of children. These reviews don’t parse words. Reviewers say Horizon Worlds is “overrun with kids.”<sup>98</sup> They say the game is “all children,” and they describe the high number of underage users as a “plague.”<sup>99</sup> All of these reviews are written by verified owners and are published in Meta’s own app store. As such, Meta has direct access to these reviews and knows that they are a credible representation of real experiences on the platform. Taken together, these reviews provide clear indicia of the age of users in Horizon Worlds and demonstrate Meta’s actual knowledge that it is collecting data from children under the age of 13 without parental consent.

Moreover, Meta has access to an almost incomprehensible amount of data about its users. Meta collects information about a user’s account status, retinal gaze, facial expressions, body

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<sup>95</sup> Moderators and Community Guides, Meta (April 1, 2025), [https://www.meta.com/help/quest/articles/horizon/safety-and-privacy-in-horizon-worlds/community-guides-in-horizon/?srsltid=AfmBOophGLsbvcvfpd4a4m2cmZaNrgMWETzHQnC\\_2U1kpMsfxMS11iF](https://www.meta.com/help/quest/articles/horizon/safety-and-privacy-in-horizon-worlds/community-guides-in-horizon/?srsltid=AfmBOophGLsbvcvfpd4a4m2cmZaNrgMWETzHQnC_2U1kpMsfxMS11iF) (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>96</sup> *Id.*

<sup>97</sup> Supplemental Meta Platforms Technologies Privacy Policy, Meta (March 31, 2025), [https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk\\_cj](https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk_cj) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>98</sup> Analysis of Horizon Worlds’ Reviews with Screenshots, Appendix E, at 2.

<sup>99</sup> *Id.* at 1, 15.



movement, body size, health information, voice recordings, and more.<sup>100</sup> Meta is also able to combine and cross-reference this data with personal information about a user and/or the user’s immediate family collected through its other platforms like Instagram and Facebook.<sup>101</sup> Meta has already begun using facial data for age verification, and last year it reported using AI and machine learning to identify behavioral “signals” that identify an Instagram user as under 18.<sup>102</sup> With a trove of personal information and biometric identifiers at its fingertips, Meta cannot credibly claim that it is not able to confirm the age of suspected underage users, nor can it credibly claim that it cannot determine whether a child is improperly accessing the platform with a standard account.

Finally, all of these assertions are confirmed by the firsthand experience of Ms. Stonelake. As the Director of Product Marketing for the platform, Ms. Stonelake had direct access to the communications and experiences of Meta’s leadership at Horizon Worlds. In her statement, Ms. Stonelake lays out multiple instances in which Meta executives were given, or specifically acknowledged, actual knowledge of underage users in Horizon Worlds. Meta’s then-Product Marketing Manager Meaghan Fitzgerald admitted during Ms. Stonelake’s onboarding process that children are present on the platform.<sup>103</sup> Members of Meta’s leadership team were present at a November 2022 roundtable discussion in which third-party game and experience creators explicitly stated that the influx of underage users on the platform was creating risks to the safety of Horizon Worlds communities.<sup>104</sup> At least eight Meta executives in addition to Ms. Stonelake participated in “playtests,” wherein they explored Horizon Worlds and directly witnessed children on the platform.<sup>105</sup> Meta employees specifically discussed the overwhelming presence of children in Horizon Worlds within Meta workplace forums, all of which were accessible by Meta executives.<sup>106</sup> And Ms. Stonelake herself specifically raised concerns about underage users accessing the platform to Meta executives, only to be rebuffed and excluded from further discussions about the issue.<sup>107</sup>

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<sup>100</sup> See Supplemental Meta Platforms Technologies Privacy Policy, Meta (March 31, 2025), [https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk\\_cj](https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk_cj) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>101</sup> Parent Privacy Disclosure, Meta (March 31, 2025), [https://www.meta.com/legal/quest/parent-privacy-disclosure/?utm\\_source=www.meta.com&utm\\_medium=organicsearch](https://www.meta.com/legal/quest/parent-privacy-disclosure/?utm_source=www.meta.com&utm_medium=organicsearch) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>); Supplemental Meta Platforms Technologies Privacy Policy, Meta (March 31, 2025), [https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk\\_cj](https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBGqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk_cj) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>102</sup> Confirming your age on Facebook, Meta (April 9, 2025), <https://www.facebook.com/help/958848942357089/> (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>); See also Emma Roth, *Instagram is putting every teen into a more private and restrictive new account*, The Verge (Sep. 17, 2024) <https://www.theverge.com/2024/9/17/24246423/instagram-teen-account-private-restrictive> (stating “[Instagram] can now use AI to scan for signals that may indicate a user is under 18”).

<sup>103</sup> Sworn Statement of Kelly Stonelake, Appendix A, at 4.

<sup>104</sup> *Id.* at 4-5.

<sup>105</sup> *Id.* at 5.

<sup>106</sup> *Id.* at 4.

<sup>107</sup> *Id.* at 8.

Rather than address the privacy and safety concerns created by allowing users under the age of 13 to access Horizon Worlds with standard accounts, Meta decided to shirk its obligations under COPPA by attempting to avoid any documentation that revealed their actual knowledge of child users. Ms. Stonelake’s statement documents multiple instances in which Meta executives discouraged employees from documenting or discussing the presence of underage users on the platform.<sup>108</sup> Meta leadership directed Ms. Stonelake to suppress concerns from Senior Marketing Director Kerry Antos about the “rampant product and safety concerns” created by the presence of children on the platform, telling Ms. Stonelake to “shut her up.”<sup>109</sup> Meta executives ignored concerns from Ms. Stonelake’s marketing team when they uncovered inadequate monitoring tools or potential problems with regulatory compliance.<sup>110</sup> And Meta executives rebuffed Ms. Stonelake when she specifically raised concerns about underage users and inadequate parental control features, telling her that discussing these issues needed to remain confidential due to “legal sensitivities.”<sup>111</sup>

Many of the executives working on Horizon Worlds during Ms. Stonelake’s tenure at Meta are still at the company to this day. Yet, as established by Fairplay’s investigation, Horizon Worlds continues to knowingly allow a substantial number of users under the age of 13 to access the platform with standard accounts. Meta should be complying with the requirements of COPPA. Instead, it consistently turns a blind eye, willfully ignoring the substantial presence of underage children on its platform and collecting copious amounts of data from child users without parental consent. The FTC must investigate whether Meta’s conduct amounts to a violation of COPPA and bring enforcement actions to the fullest extent of the law.

## **VI. Children accessing Horizon Worlds on standard accounts encounter a range of harms and developmentally inappropriate experiences. Meta has ample evidence that child users are facing these pervasive health and safety risks.**

As outlined above, a large number of children are exploring Horizon Worlds with standard accounts, which lack critical data privacy and safety protections. As a result, these child users face the risk of serious harms, including sexual abuse and predation, cyberbullying, and financial exploitation. Fairplay found evidence of these harms during its research on the platform. These issues are also well-documented in dozens of reviews published in Meta’s own app store that explicitly describe dangers to children in Horizon Worlds. Reports from other organizations and journalists further corroborate our findings.

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<sup>108</sup> *Id.* at 6, 12.

<sup>109</sup> *Id.* at 8.

<sup>110</sup> *Id.*

<sup>111</sup> *Id.* at 9-10.

Meta has a history of prioritizing profit over youth well-being and of capitalizing on young users’ developmental vulnerabilities. Complaints filed in the multistate action against Instagram revealed that Meta’s internal research shows that the platform’s engagement-maximizing design features contribute to negative impacts on minors’ mental health, sleep, social relationships, and productivity — but Meta pushes youth to spend more time on Instagram anyway. In an internal document titled “Teen Fundamentals,” Meta researchers specifically identified opportunities for growth based on vulnerabilities of the teenage brain, including teens’ relative immaturity and tendency to be driven by emotion, novelty, and reward.<sup>112</sup> For example, the company relies on children’s increased tolerance for “push” notifications to create a psychological environment in which teens are programmed to return to Instagram “over and over” in hopes of receiving positive social validation as some sort of “award.”<sup>113</sup> Meta has previously touted its ability to target advertisements to teens based on their moods and feelings, including worthlessness, anxiety, and insecurity.<sup>114</sup>

Testimony from former employee Ms. Stonelake confirms that Meta’s conduct as to teens is no different in Horizon Worlds. In her sworn statement in support of this complaint, she says that Meta touted Horizon Worlds as a platform for inclusion and belonging: “In reality, it became a breeding ground for unchecked racism, sexual harassment, bullying, and child endangerment.”<sup>115</sup> She also writes, “If investigated, Meta’s internal discussions, including meeting notes, Workplace messages, and emails, will reveal that executives were aware of the underage user problem and deliberately chose to prioritize growth over safety.”<sup>116</sup> Her descriptions of the company’s internal awareness of specific harms is incorporated in the subsections below.

Importantly, the harms outlined in this Section are significantly exacerbated because children experience them in the immersive world of VR/XR. Research shows that when young users experience VR/XR, they treat their avatars like their own bodies.<sup>117</sup> As a result, VR/XR experiences feel “really real,” and the negative effects are greater than when using a gaming console or mobile device.<sup>118</sup> This supercharges the psychological harm from cyberbullying and sexual abuse, the effectiveness of financial manipulation, and the negative impacts on mental

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<sup>112</sup> Complaint and Jury Demand, *Commonwealth of Massachusetts v. Meta Platforms, Inc.*, No. 23-2397-BLS1 (Mass. Super. Ct. Nov. 6, 2023) at ¶¶ 75-76.

<sup>113</sup> *Id.* at ¶ 78.

<sup>114</sup> Sam Machkovech, *Report: Facebook Helped Advertisers Target Teens Who Feel “Worthless”*, ArsTechnica (May 1, 2017), <https://arstechnica.com/information-technology/2017/05/facebook-helped-advertisers-target-teens-who-feel-worthless/>; see also Kaveh Waddell, *Facebook Approved Alcohol and Gambling Ads Targeting Teens*, Consumer Reports (July 27, 2021) (Tech Transparency Project and Reset Australia found that advertisers can target teens on Facebook and Instagram based on their interests in alcohol, tobacco, pharmaceuticals and extreme weight loss.) <https://www.consumerreports.org/advertising-marketing/facebook-approved-alcohol-gambling-tobacco-weight-loss-ads-targeting-teens-a1062200831/>.

<sup>115</sup> Sworn Statement of Kelly Stonelake, Appendix A, at 7.

<sup>116</sup> *Id.* at 13.

<sup>117</sup> *Buying to Belong*, *supra* note 8, at 45.

<sup>118</sup> *Id.*

health, all of which are already heightened due to the developmental vulnerabilities of children under 13.

On many social and social gaming VR/XR platforms, voice and text chatting with other users is central to the platform’s design – but it is also often a major source of harm for children and teens. The Commission acknowledged the harm that live on-by-default text and voice chat poses to kids and teens in its 2023 Fortnite action against Epic Games.<sup>119</sup> Kids and teens access these platforms explicitly for social interaction. In focus group research Fairplay conducted with social gaming platform users ages 9-15, we found:

Participants consistently cited social interaction as a motivation for spending time on social gaming platforms like Roblox and Fortnite. Participants appreciated being able to socialize at almost any time with people who lived anywhere. Games that did not facilitate socializing were regarded as less “fun” than games that made it easy to socialize.<sup>120</sup>

Socialization – including socialization with strangers – is the point. The harms described below raise significant questions about whether VR/XR experiences that are centered on player socialization can ever actually be appropriate or safe for children and teens.

#### ***A. Child sexual abuse and predation***

Children using Horizon Worlds on standard accounts are exposed to highly sexualized content and predatory behavior. Fairplay’s own research and outside reports demonstrate that the platform poses substantial risks to young players related to child sexual abuse material and interactions with predators.

There is ample evidence that Meta has direct knowledge of this problem. The aforementioned sworn statement from Ms. Stonelake details the way Meta employees have been aware of risks to young users for years. She says leadership knew the platform was “rife with child endangerment, harassment, and inappropriate interactions.”<sup>121</sup> Dozens of Horizon Worlds reviews discuss a high risk of sexual predation. As previously emphasized, these reviews are posted on Meta’s own platform by verified Horizon Worlds users, thereby providing Meta with actual knowledge that children are facing these risks in Horizon Worlds. Users say Horizon Worlds is “full of child predators,” that there are too many ‘pedos,’” and adults are having “sexual conversations with kids”<sup>122</sup> One reviewer complained about hearing adult “pedophiles” talking

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<sup>119</sup> Complaint for Permanent Injunction, Civil Penalties, and Other Relief, *United States v. Epic Games, Inc.*, No. 5:22-CV-00518 (E. Dist. N.C. Dec. 19, 2022), at ¶¶ 36-42.

<sup>120</sup> *Buying to Belong*, *supra* note 8, at 22.

<sup>121</sup> Sworn Statement of Kelly Stonelake, Appendix A, at 11.

<sup>122</sup> Analysis of Horizon Worlds’ Reviews with Screenshots, Appendix E, at 26, 29.

about sex “with kids who are 6-12.”<sup>123</sup> Some users complained of “creepy players” and said they dislike being “stalked.”<sup>124</sup>

Age

★ ☆ ☆ ☆ ☆ 22 days ago

I think U need to change age access to 16 plus there is to many pedos on here and way to many minors 12-13 isn't grown up



Jazzy Helpful | 4

Child/Adult separate instances only

★ ★ ★ ★ ★ Aug 25 at 4:33 PM

Kids should have thier own instance. That way the kids dont annoy the adults and vice versa. I dont mind children, however, i have seen some sick stuff being said to children that dont understand what is going on. It is because of this that I hope that you can think about this. Take it seriously. The kids deserve this. Also, there are not enough of the community people in there to catch it all. Seriously.



Happy Helpful | 52

In some reviews, young users describe specific instances of inappropriate sexual conduct. One user said she overheard someone asking children about genitalia, and another said adults say “weird stuff” that “makes me uncomfortable.”<sup>125</sup>

Some absolute disgusting people

★ ☆ ☆ ☆ ☆ A day ago

I'd be careful on here, weird kids talking about d@@ks and asking other children if they know what d@Ek is. Some parents need to be checking hard drives

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<sup>123</sup> *Id.* at 29.

<sup>124</sup> *Id.* at 28.

<sup>125</sup> *Id.* at 26, 28.

:(I love the game but weird stuff happe.

★ ★ ★ ★ ★ Sep 2 at 5:02 PM

I love the game, but weird stuff always happens like when I say fake a f k, a random 18 year old comes up and does something weird and says really weird stuff, and it really makes me uncomfortable, so can you please send like, say some rules in the intro or something or like I don't know like put a system where it warns you if you say really bad stuff 😞



VenzoBeanie



Helpful | 1

These reviews are consistent with investigations other organizations have conducted on Horizon Worlds. Researchers for the Center for Countering Digital Hate witnessed adults use sexual language with young users, including graphic language about sex acts.<sup>126</sup> That report also found that young users were able to access “adult”-themed games and experiences<sup>127</sup> in Horizon Worlds, many of which included sexually explicit content, references to illegal drug use, and gambling.<sup>128</sup> Another report by SumOfUs describes the prevalence of sexual harassment and non-consensual sexual encounters in Horizon Worlds. Those researchers observed racist, homophobic, and sexual hate speech directed toward children in Horizon Worlds, and said “they were astonished by how quickly they encountered disturbing acts of sexual harassment.”<sup>129</sup> Both of these research reports were produced well before the November 2024 policy change that officially allowed children to use the platform on special protected accounts, further demonstrating that young children have been using standard accounts to access Horizon Worlds for years.

Child safety experts have warned for years that when new online spaces are created for kids, as with XR/VR, predators will follow.<sup>130</sup> Further, VR/XR presents unique challenges to protecting youth from sexual misconduct and predation. As Thorn described in a December 2024 analysis of emerging technologies:

Current content moderation capabilities for ephemeral events, such as audio or embodied interactions, are limited compared with the body of moderation tools designed for logged interactions, such as uploaded images, videos, or text. In addition to the lack of technology to identify violative behavior in real time, the lack of a record of the interaction limits the verification of a reported infraction or enforcement of a policy in some instances. As a result, the potential for interactions outside of the protections of existing content

<sup>126</sup> Center for Countering Digital Hate, *Horizon Worlds Exposed*, *supra* note 17, at 14-16.

<sup>127</sup> Fairplay did not investigate young users’ access to adult content, as it limited its investigation to “Today’s Top 20” games and experiences within Horizon Worlds, none of which prominently featured explicitly adult content.

<sup>128</sup> Center for Countering Digital Hate, *Horizon Worlds Exposed*, *supra* note 17, at 4.

<sup>129</sup> SumOfUs, *Metaverse: Another Cesspool of Toxic Content*, (May 2022), [https://www.eko.org/images/Metaverse\\_report\\_May\\_2022.pdf](https://www.eko.org/images/Metaverse_report_May_2022.pdf).

<sup>130</sup> Oremus, *Kids are flocking to Facebook’s ‘metaverse.’*, *supra* note 7.

moderation capabilities is much higher in XR environments than in traditional 2D social media exchanges.<sup>131</sup>

Indeed, youth report experiencing sexual abuse and predation on VR/XR platforms. A 2024 study of U.S. teenagers found that approximately 36% owned a VR headset, and of the teens who had visited a VR platform in the previous year, approximately 19% experienced sexual harassment, 18% experienced “grooming or predatory behavior,” and 21% experienced another avatar sharing or displaying unwanted violent or sexual content.<sup>132</sup> The study also found that teenage girls were more likely than teenage boys to experience sexual harassment and predation. As a result, teenage girls “intentionally choose avatars that are less likely to invite harassment or other abusive behaviors, and ... also employ more in-platform tools to keep other avatars at a safe distance when interacting with them.”<sup>133</sup>

Additional research is needed on the prevalence of these harms among children under 13, but the effects are no less dire for younger children. Adolescent exposure to sexual harassment is associated with increased depression, loneliness, and poor self-esteem.<sup>134</sup> Further, children’s existing vulnerabilities make them more susceptible to online grooming: “[C]ertain populations of youth are disproportionately susceptible to online grooming, such as those who suffer from emotional distress or mental health problems, low self-esteem, poor parental relationships and weak family cohesion.”<sup>135</sup> Children urgently need protection from sexual harassment and predation on these platforms.

### ***B. Cyberbullying and harassment***

Children using standard accounts in Horizon Worlds are exposed to rampant bullying and harassment that is not purely sexual – though the line between sexual and other forms of harassment is often blurry. As outlined below and explained in previous research by Fairplay, cyberbullying has unique negative impacts on minors, including risks to mental health.<sup>136</sup> Due to

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<sup>131</sup> Melissa Stroebel, Rebecca Portnoff, Caroline Neiswender, et al., *Evolving Technologies Horizon Scan: A review of technologies carrying notable risk and opportunity in the fight against technology-facilitated child sexual exploitation*, Thorn and WeProtect Global Alliance (December 2024) at 25,

[https://info.thorn.org/hubfs/Research/Thorn\\_x\\_WPGA\\_EvolvingTechnologies\\_Dec2024.pdf](https://info.thorn.org/hubfs/Research/Thorn_x_WPGA_EvolvingTechnologies_Dec2024.pdf).

<sup>132</sup> Sameer Hinduja & Justin W. Patchin, *Evolving Technologies Horizon Scan: A review of technologies carrying notable risk and opportunity in the fight against technology-facilitated child sexual exploitation*, New Media & Society (2024) at 6-7, <https://journals.sagepub.com/doi/10.1177/14614448241284413>.

<sup>133</sup> *Id.* at 9.

<sup>134</sup> Tore Bonsaksen, Anne Mari Steigen & Marie Dahlen Granrud, et al., *Sexual harassment exposure among junior high school students in Norway: prevalence and associated factors*, 12 *Frontier Public Health* at 5 (Jan. 18, 2024), <https://www.frontiersin.org/journals/public-health/articles/10.3389/fpubh.2024.1307605/full>.

<sup>135</sup> Hinduja & Patchin, *Evolving Technologies*, *supra* note 132, at 2 (internal citations omitted).

<sup>136</sup> Fairplay & Kristin Bride, Request for Investigation of NGL Labs for violations of Section 5 of the FTC Act (Oct. 19, 2023), [https://fairplayforkids.org/wp-content/uploads/2023/10/NGL\\_complaint.pdf](https://fairplayforkids.org/wp-content/uploads/2023/10/NGL_complaint.pdf).

the immersive nature of VR/XR environments, cyberbullying on these platforms is more visceral and even higher risk for children.<sup>137</sup>

Our researchers witnessed multiple instances of cyberbullying and harassment during their investigation. Bullying in Horizon Worlds is often based on an avatar's appearance and the assumptions other users make about a user's race, gender, or sexuality based on their avatar. In one visit to "MetDonald's," a virtual imitation of the famous fast-food chain, young users were harassed and bullied, and descriptions including "ugly," "Mexican," "fatass," "weird and gay," and a "stupid little bitch" were used as insults.<sup>138</sup> In a visit to Horizon Central, researchers witnessed a user with an adult voice call a child user with a female avatar a "whore."<sup>139</sup> During an unlogged follow-up visit in February 2025, Fairplay researchers witnessed two users in Horizon Central repeatedly swarm and harass underage children, using racial slurs and making fun of their avatars.

As described in Section IV(C), Ms. Stonelake testifies that Horizon Worlds leadership was aware of this problem. When she joined the Horizon Worlds team in July 2022, a senior marketing director "expressed concerns about the presence of children and teens including frequent slurs/harassment within the experience[.]" She was discouraged from raising these concerns in leadership meetings and instead told to "shut [the marketing director] up."<sup>140</sup> Ms. Stonelake continued to raise the concerns in leadership meetings anyway and was eventually excluded from those meetings as a result.<sup>141</sup>

In August 2022, a Black Meta employee shared his Horizon Worlds experiences in an internal workplace group. Ms. Stonelake writes:

[Y]oung users ... directed racially pejorative terms such as "monkey" at him, an ethnic slur. He also recounted instances where children (including users under the age of 13) disrupted virtual cooking experiences by sabotaging the activities and using offensive language. Mr. Wheeler further described environments in Horizon Worlds populated by young individuals who persistently used profanity and racial slurs. The response by leadership was more focused on mitigating the complaint rather than addressing the underlying issues.<sup>142</sup>

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<sup>137</sup> *Buying to Belong*, *supra* note 8, at 45.

<sup>138</sup> Researcher Video Logs, Appendix B, at MD1.

<sup>139</sup> *Id.* at HC2.

<sup>140</sup> Sworn Statement of Kelly Stonelake, Appendix A, at 7-8.

<sup>141</sup> *Id.* at 8.

<sup>142</sup> *Id.* at 4.



This message was shared and discussed among Meta and Horizon Worlds leadership, and Ms. Stonelake says it was also included in materials for a Horizon Creator Roundtable event she hosted in November 2022. Horizon World’s leadership reviewed those materials and attended that event.

Ms. Stonelake also provides a representative sample of Reddit comments about children in Horizon Worlds in her statement. These comments describe children screaming, being racist and “obnoxious and immature,” and yelling “shut up” and “I’m going to kill you” at others on the platform. She says, “These public statements align precisely with the concerns raised internally at Meta. They reinforce what employees, developers, and executives already knew: Horizon Worlds is rife with child endangerment, harassment, and inappropriate interactions.”<sup>143</sup>

Focus group participants in Fairplay’s recent report, “Buying to Belong: Youth and Virtual Assets in the Metaverse,” similarly describe bullying and harassment as typical features of social VR/XR platforms. Children ages 9-15 who use social gaming platforms, including Horizon Worlds, were interviewed about their time spent on these types of platforms, their motivation for using them, and their experiences with virtual goods, advertising, and social comparison, among other topics. Participants shared that bullying based on appearance and perceived wealth were common:

Participants consistently named bullies as the biggest obstacle to online socializing (more so than trolls). Bullies targeted players based on perceived wealth, race, and LGBTQ+ identity. Because bullies often focused on an avatar’s appearance, many of our participants learned how to use virtual assets to shield themselves from bullying, harassment, and exclusion.<sup>144</sup>

Research participants said they have witnessed other users in VR/XR platforms being bullied because their avatars were wearing default or inexpensive virtual clothes or other items.<sup>145</sup>

Horizon Worlds reviews also describe widespread bullying and abusive language on the platform.

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<sup>143</sup> *Id.* at 11.

<sup>144</sup> *Buying to Belong*, *supra* note 8, at 22.

<sup>145</sup> *Buying to Belong*, *supra* note 8, at 25, 29.

### Report Button is corrupt

★ ☆ ☆ ☆ ☆ 24 days ago

They won't even let me report all the issues about their game. DO NOT BUY!!!! Pedos are everywhere and little kids screaming the N-Word constantly, along with horrible lag. Do. Not. Get.



Matthias Helpful | 6

### Abuse central

★ ☆ ☆ ☆ ☆ 12 Aug at 19:18

Non-stop epithets, hateful slurs, violent threats, harassment, bullying, & intimidation. Report someone? No matter what, comes back as 'not a violation'. Complain to support? They end the chat. Meta needs the numbers for engagement to show investors, so they won't kick anyone off the platform no matter what they say or do. No consequences makes it a free for all. Something tragic is bound to happen, if it hasn't already. In my last visit, I was called the n word a few dozen times, filed a report and they said it was not a violation. Chat just closes as resolved over and over. Literally no one cares - not the toxic kids doing the abuse, not the support team, and not meta. It was like this on launch and still as of last week.

[See less](#)



Danny Mac Helpful | 14

### Ugh...

★ ☆ ☆ ☆ ☆ 5 days ago

An embarrassment of children shouting racial slurs and empty, circa-2005 looking worlds that instill a sense of overall sadness. What a waste of billions!

These instances of cyberbullying, racism, and homophobia are harmful in their own right, but they also translate to real world impacts on the health and well-being of young users. As outlined in detail in our “Buying to Belong” report, children and adolescents are more sensitive to social rewards and feedback.<sup>146</sup> Children in Horizon Worlds face rampant bullying at a period when they are developing their self-identity and are particularly attentive to how they are treated by others.<sup>147</sup> Long-standing research correlates cyberbullying with elevated stress and depression levels and feelings of sadness, hopelessness, powerlessness, and emotional distress.<sup>148</sup> For users from marginalized groups, these impacts can cause significant “wear and tear” on their developing

<sup>146</sup> *Buying to Belong*, *supra* note 8, at 41.

<sup>147</sup> *Buying to Belong*, *supra* note 8, at 41.

<sup>148</sup> See Charisse L. Nixon, *Current Perspectives: the Impact of Cyberbullying on Adolescent Health*, 5 *Adolescent Health, Medicine and Therapeutics* 143 (2014), <https://www.tandfonline.com/doi/full/10.2147/AHMT.S36456>; see also Michele P. Hamm, Amanda S. Newton & Annabritt Chisholm, *Prevalence and Effect of Cyberbullying on Children and Young People: A Scope Review of Social Media Studies*, 169 *JAMA Pediatrics* 770 (2015), <https://jamanetwork.com/journals/jamapediatrics/article-abstract/2337786>.

brains, with lifelong effects on learning, behavior, and physical and mental health.<sup>149</sup> As Fairplay has previously highlighted before the Commission, meta-analyses of cyberbullying studies have repeatedly identified a positive association between cyberbullying and suicidality and/or self-harm.<sup>150</sup> Ultimately, the cyberbullying and harassment children face in Horizon Worlds is an urgent mental health issue.

### **C. Financial harms**

Children in Horizon Worlds face a range of harms related to spending and financial manipulation. Some reflect financial harms children face across online platforms, including surveillance and manipulation as a result of data-driven advertising, as well as blurred influencer marketing. Horizon Worlds also employs design techniques common in video games, including virtual currencies, that induce children to spend more money while obfuscating real-world costs. There are also financial challenges to children that are unique to VR/XR experiences, including those related to avatars and virtual assets.

Meta's motivation in building a successful virtual reality platform is closely related to its overall goals to track and profile users across all of its products and more effectively target them with data-driven advertising. Ms. Stonelake says:

Meta's aggressive push for Horizon Worlds was not motivated by a genuine belief in the product's value but rather by financial necessity. The company's core advertising business faced significant disruption following Apple's iOS 14 privacy updates, which limited the effectiveness of targeted ads.

When Brett Vogel first described the opportunity to me, he explained that Meta needed Horizon and the broader Metaverse initiative to generate new revenue streams as quickly as possible due to the revenue disruption caused by iOS 14.<sup>151</sup>

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<sup>149</sup> Rod McCullom, *What science tells us about structural racism's health impact*, Harvard Public Health (Oct. 3, 2022), <https://harvardpublichealth.org/equity/what-science-tells-us-about-structural-racisms-health-impact/>.

<sup>150</sup> See Ann John, Alexander Charles Glendenning & Amanda Marchant, et al., *Self-Harm, Suicidal Behaviours, and Cyberbullying in Children and Young People: Systematic Review*, 20 *J. of Internet Medical Research* (2018), <https://doi.org/10.2196/jmir.9044>; Robin Kowalski, Gary Giumetti, et al., *Bullying in the Digital Age: A Critical Review and Meta-Analysis of Cyberbullying Research Among Youth*, 140 *Psychological Bulletin* 1073, 1124 (2014) <https://doi.org/10.1037/a0035618>; Mitch van Geel, Paul Vedder & Jenny Tanilon, *Relationship Between Peer Victimization, Cyberbullying, and Suicide in Children and Adolescents: A Meta-analysis*, 168 *JAMA Pediatrics* 435, 440 (2014), <https://pubmed.ncbi.nlm.nih.gov/24615300/>; see also Sameer Hinduja & Justin W. Patchin, *Connecting Adolescent Suicide to the Severity of Bullying and Cyberbullying*, *Journal of School Violence*, 18 *J. of School Violence* 333, 7 (2019), <https://www.tandfonline.com/doi/abs/10.1080/15388220.2018.1492417>.

<sup>151</sup> Sworn Statement of Kelly Stonelake, Appendix A, at 11-12.

As described in detail in Section V, above, Meta is able to capture a range of sensitive data with its Quest headsets. Further, its privacy terms are clear that this data can be used to profile and target users across platforms, including Instagram.<sup>152</sup> Previous Fairplay reports and filings before this Commission make clear that children, who are still developing in their understanding of money and the economy, do not recognize or understand data-driven targeted advertising.<sup>153</sup> And as outlined in the introduction to this section, Meta has touted – in internal documents and to advertisers – its ability to capitalize on young users’ developmental vulnerabilities in order to influence them. This is as true in Horizon Worlds as it is on other Meta platforms.

Fairplay has also previously outlined the substantial risks that stealth advertising poses to children and teens online. Stealth advertising techniques – including advergaming and sponsored content – blur the lines between marketing and children’s pleasurable experiences with online games or videos.<sup>154</sup> Meta employs many of these techniques in Horizon Worlds. It has publicized partnerships with major brands in Horizon Worlds games and experiences, including the NBA, Wendy’s, Prada, and Balenciaga.<sup>155</sup> It also hosts “events” with celebrities and influencers popular with kids, such as BLACKPINK, Billie Eilish, and Sabrina Carpenter.<sup>156</sup> Research clearly demonstrates that children do not understand this type of marketing and are unable to respond to it as a paid attempt to influence their behavior.<sup>157</sup> In reality, the use of familiar brands and

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<sup>152</sup> Supplemental Meta Platforms Technologies Privacy Policy, Meta (March 31, 2025), [https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk\\_cj](https://www.meta.com/legal/privacy-policy/?srsltid=AfmBOopcQwQBqBGgg0O9IWUaT7koqiFof2JAd0e-z56RTXG6YLgk_cj) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>); Parent Privacy Disclosure, Meta (March 31, 2025), [https://www.meta.com/legal/quest/parent-privacy-disclosure/?utm\\_source=www.meta.com&utm\\_medium=organicsearch](https://www.meta.com/legal/quest/parent-privacy-disclosure/?utm_source=www.meta.com&utm_medium=organicsearch) (download available at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>153</sup> Comments of Center for Digital Democracy & Fairplay, et al., in the Matter of Trade Regulation Rule on Commercial Surveillance and Data Security, Commercial Surveillance ANPR, Docket No. FTC-2022-0053-0001 (Nov. 21, 2022) at 30-33, [https://fairplayforkids.org/wp-content/uploads/2022/11/ANPRM\\_comments.pdf](https://fairplayforkids.org/wp-content/uploads/2022/11/ANPRM_comments.pdf); Comments of Fairplay, et al. in the Matter of Protecting Kids from Stealth Advertising in Digital Media (July 18, 2022) at 5-13, <https://fairplayforkids.org/wp-content/uploads/2022/07/influencer-comments.pdf>.

<sup>154</sup> Comments of Fairplay, et al. in the Matter of Protecting Kids from Stealth Advertising, *supra* note 153, at 1.

<sup>155</sup> NBA Communications, *NBA and Meta announce multiyear partnership extension* (Jan. 23, 2023), <https://pr.nba.com/nba-and-meta-announce-multiyear-partnership-extension/>; Wendy’s, *Step Into The “Wendyverse”*

*Wendy’s New Immersive VR Metaverse Experience* (Aug. 31, 2022), <https://www.wendys.com/blog/blog-home/wendyverse-here-heres-how-you-get-it>; Maghan McDowell, *Meta’s new digital fashion marketplace will sell Prada, Balenciaga and Thom Browne*, *Vogue* (June 17, 2022), <https://www.voguebusiness.com/technology/metaverse-digital-fashion-marketplace-will-sell-prada-balenciaga-and-thom-browne>.

<sup>156</sup> Sabrina Carpenter to Take Center Stage in Meta Horizon Worlds, *Plus More Summer Fun*, Meta (June 25, 2024), <https://www.meta.com/blog/sabrina-carpenter-horizon-worlds-super-rumble-kaiju-city-showdown-samurai-tycoon/> (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>); Meta Horizon Worlds Kicks Off VR Concert Events with BLACKPINK, iHeartRadio, and Red Rocks Series, Meta (Nov. 15, 2023), <https://www.meta.com/blog/blackpink-iheartradio-red-rocks-music-festival-vr/> (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>).

<sup>157</sup> Comments of Fairplay, et al. in the Matter of Protecting Kids from Stealth Advertising, *supra* note 153, at 5-13.

characters is likely to make children trust the advertising more.<sup>158</sup> These tactics are widespread in Horizon Worlds.

These negative effects have a disproportionate impact on children from historically marginalized groups, including children of color and children from low-income families. When data is improperly collected from Horizon Worlds and used for targeted advertising, young users can be segmented into groups based on their perceived identities, assumed interests, or inferred traits.<sup>159</sup> For example, researchers have previously found that Meta’s ad delivery optimization engine skewed the delivery of certain ads based on race and gender.<sup>160</sup>

Other financial risks to users in Horizon Worlds come from video-game like features, including virtual currency and avatars. Meta pushes young users in Horizon Worlds to spend real world money on virtual assets through purchases of its virtual, in-game currency called “Meta Credits.” As with other virtual currencies like Roblox’s “Robux,” and Fortnite’s “V-Bucks,” Meta Credits can only be purchased in “bundles” that have variable bonus structures, which further obfuscate Meta Credits’ real-world cost.<sup>161</sup>

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<sup>158</sup> Comments of Fairplay, et al. in the Matter of Protecting Kids from Stealth Advertising, *supra* note 153, at 7-9, 12-13.

<sup>159</sup> *Buying to Belong*, *supra* note 8, at 18, 28.

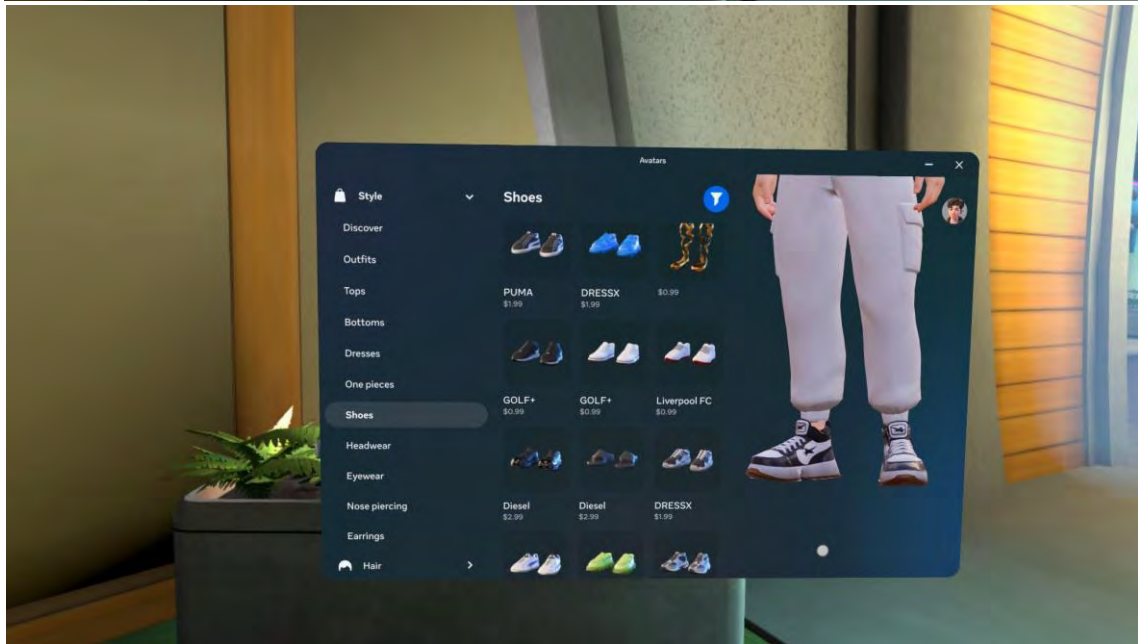
<sup>160</sup> Kelsey Sutton, *Facebook's Automated Systems Skew Ad Delivery Based on Race, Gender*, Adweek (April 4, 2019), <https://www.adweek.com/performance-marketing/facebooks-automated-systems-skew-ad-delivery-based-on-race-gender/>.

<sup>161</sup> Scott Hayden, *Meta Quietly Rolls Out 'Horizon Worlds' Premium Digital Currency in US, UK and Canada*, Road to VR (Nov. 15, 2024), <https://www.roadtovr.com/meta-digital-currency-horizon-worlds/#:~:text=Roblox%20has%20Robux%2C%20Rec%20Room,just%20stuff%20in%20Horizon%20Worlds>. For an extensive discussion on the financially exploitative of virtual currencies in social gaming platforms, see Ailo Krogh Ravna & THomas Iversen, *Getting Played: The true cost of virtual currency*, Norwegian Consumer Council (Sept. 2024), <https://storage02.forbrukerradet.no/media/2024/09/getting-played-2024-compressed-komprimert-sept24-1.pdf>

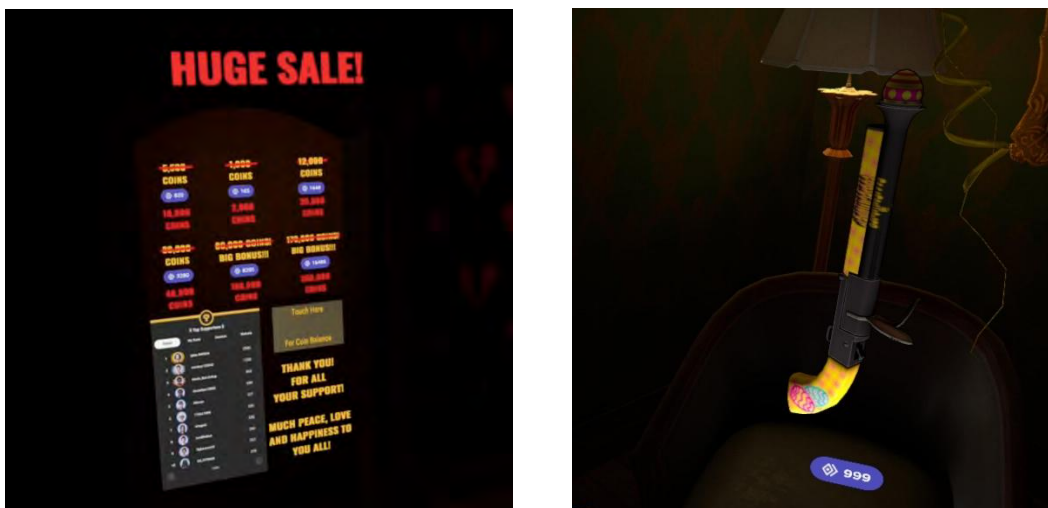


*A screenshot from Horizon Worlds showing purchase options for Meta Credits*

Meta encourages users to spend Meta Credits on virtual items like clothes and accessories for their avatars. As described in the discussion of bullying and harassment in Horizon Worlds above, youth focus group participants said VR/XR users are bullied for having free or low-cost clothes or skins on their avatars.



Meta also allows game creators to accept Meta Credits for in-game purchases. For example, users can spend Meta Credits to buy virtual weapons in “Spin the Bottle.”



*Screenshots taken from inside “Spin the Bottle” showing premium weapons for purchase*

As Fairplay has described in previous filings before the FTC, virtual currencies create an inherent unfairness for child users who are just beginning to understand real-world money and economic concepts.<sup>162</sup> As Save Share Spend’s Nathan Dungan, a Fairplay board member, explained to the Wall Street Journal, “The danger with these purchases is that money turns magical. Children’s brains can’t process these virtual transactions because it’s not tangible to them.”<sup>163</sup>

Further, in-game virtual currencies like Meta Credits present particular risks for young users because purchases may not be subject to financial protection regulations.<sup>164</sup> For example, Meta Credits cannot be redeemed outside of Horizon Worlds, cannot be exchanged for monetary value, cannot be returned or refunded, and Meta may unilaterally “terminate” a user’s license to use Meta Credits if it “decides in its discretion to stop offering” them.<sup>165</sup>

Finally, as described in the subsection on bullying, above, Fairplay research demonstrates

<sup>162</sup> Fairplay & Center for Digital Democracy, et al., Request for Investigation of Unfair and Deceptive Practices by Electronic Arts, Inc. (June 2, 2022), <https://fairplayforkids.org/wp-content/uploads/2022/06/LootboxLetter.pdf>.

<sup>163</sup> Julie Jargon, *You Spent \$1,500 on Virtual Bazookas? Kids Are Splurging on Digital Goods*, Wall Street Journal (July 16, 2019), <https://www.wsj.com/articles/you-spent-1-500-on-virtual-bazookas-kids-are-splurging-on-digital-goods-11563291006>.

<sup>164</sup> See Consumer Financial Protection Bureau, *Banking in video games and virtual worlds* (April 4, 2024), <https://www.consumerfinance.gov/data-research/research-reports/issue-spotlight-video-games/>.

<sup>165</sup> Meta Credits Terms, Meta (April 9, 2025), <https://www.meta.com/legal/quest/meta-credits-terms/> (available for download at <https://fairplayforkids.org/wp-content/uploads/2025/04/HorizonWorldsPermalinks.pdf>): see also The European Consumer Organization (BEUC), *Game over: Consumers Fight for Fairer In-Game Purchases* (2024), [https://www.beuc.eu/sites/default/files/publications/BEUC-X-2024-068\\_A\\_legal\\_assessment\\_of\\_premium\\_in-game\\_currencies.pdf](https://www.beuc.eu/sites/default/files/publications/BEUC-X-2024-068_A_legal_assessment_of_premium_in-game_currencies.pdf).



that VR/XR environments like Horizon Worlds that offer paid skins and other virtual assets for a user’s avatar create a culture of financial pressure and “haves” and “have nots.” Research suggests that young people often view their avatars as more authentic than their real-world identities.<sup>166</sup> Platforms and marketers take advantage of this by blurring the line between self-expression and consumerism. By capitalizing on the emotional connection young players feel toward their avatars, Meta can trigger purchasing behavior by making the best avatar customizations available only through microtransactions using its virtual currencies. Ultimately, these marketing tactics and design features artificially inflate the impact of peer pressure and social comparison among young users.<sup>167</sup>

## VII. Request for investigation

Based on the facts outlined in this Request for Investigation, Meta Platforms, Inc. has been violating COPPA by knowingly allowing underage users to access Horizon Worlds with standard accounts that lacked parental notice and consent protections and by collecting data from those accounts. Fairplay’s research, reviews on Meta’s own app, and the testimony of former Meta and Horizon Worlds employee Kelly Stonelake confirm that Meta is well aware of this problem. Young users in Horizon Worlds face risks of sexual abuse and predation; cyberbullying and harassment; and financial harms.

Importantly, Meta engaged in this conduct despite being currently bound by the terms of a consent order with the FTC for previous violations of consumer privacy laws. Further, the FTC is actively pursuing modification of that order, including a proposed ban on the monetization of children’s data.<sup>168</sup> We strongly urge the FTC to investigate Meta for violations of COPPA in Horizon Worlds in the context of those ongoing proceedings. Meta has demonstrated once again its inability to protect children on its platforms appropriately, and should accordingly face consequences to the fullest extent of the Commission’s authorities.

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<sup>166</sup> *Buying to Belong*, *supra* note 8, at 28, 36-38.

<sup>167</sup> *Buying to Belong*, *supra* note 8, at 22-26.

<sup>168</sup> Proposed Decision and Order, *In the Matter of Facebook, Inc.*, Docket No. C-4365 (May 3, 2023).



## **Appendix List**

**Appendix A: Sworn Statement of Kelly Stonelake**

**Appendix B: Researcher Video Logs**

**Appendix C: Researcher Data Reconciliation Table**

**Appendix D: Researcher Data Summary Table**

**Appendix E: Analysis of Horizon Worlds' Reviews with Screenshots**

**Appendix F: Reference Audio for Child Voices**

Kelly Stonelake  
Former Director of Product Marketing, Developer Platform and Meta Horizon Worlds  
February 2009 – January 2024

7 April 2025

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

To Whom It May Concern:

I am submitting the enclosed sworn statement in support of Fairplay's petition regarding Meta Horizon Worlds' failure to protect children from well understood safety and privacy risks.

I spent nearly 15 years working at Facebook, which became Meta, rising from an hourly employee to Director of Product Marketing. I once loved Facebook and its promise to make the world more open and connected; I bet my career on it. Today, I am setting my career aside to bet on something more important: the safety and well-being of children online.

My statement outlines Meta's internal knowledge of underage users in Horizon (including children under 13), repeated warnings ignored, and a systemic pattern of choosing growth over safety.

**When I was laid off while on medical leave, I was presented with a severance agreement that required me to hold Meta harmless. I could not, and neither should you.**

I urge the FTC to subpoena internal Workplace messages, meeting notes, and launch readiness assessments from 2022 through 2024. These materials will show that Meta leadership was fully aware that children were present and unprotected in Horizon Worlds and proceeded with growth plans anyway. Safety feedback was silenced, documentation discouraged, and product launches prioritized regardless of known violations.

**Innovation advances society and leaves our children a better world. I hope my statement supports the Commission in making it clear that harming children for profit in the name of innovation isn't innovation, it's exploitation.**

Sincerely,



**Kelly Stonelake**

# Sworn Statement of Kelly Stonelake

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## I. Introduction

I, Kelly Stonelake, hereby provide this sworn statement in support of Fairplay’s research and recommendations regarding Meta Horizon Worlds.

I was employed at Meta from February 2, 2009, where I rose through the ranks from an hourly paid employee to a Director and led a career marked by distinguished performance, including being recognized multiple times with a performance rating of “Redefines Expectations” and receiving multiple additional equity grants from company leadership above and beyond Meta’s annual performance based equity awards.

The scope of my most recent role of Director of Product Marketing for Developer Platform expanded to also include Horizon Worlds in July 2022.

When I raised concerns about gaps between Meta's public promises and internal realities, especially around the presence of users under the age of 13, I was excluded from decision-making spaces rather than empowered to address them.

On January 8, 2024, I was laid off while on medical leave that began in early 2023. I've lived and led through many difficult situations at Meta, but the cognitive dissonance between Meta's public commitments to safety and integrity and my experience inside Horizon Worlds was untenable.

#### A. Scope of Product Marketing

Product Marketing (PMM) at Meta is considered the voice of the product in the market, and the voice of the market in the product – responsible for informing product development and strategy, as well as shaping and executing the go-to-market strategy.

Information that PMMs are expected to track on launches, according to mandatory internal documentation templates:

- Product vision, mission, and strategic alignment with Meta's broader goals
- Key features and functionality, including any "P0" (critical) feature risks
- Market landscape and competitive analysis
- Research insights, including barriers, implications, and mitigations
- Value propositions for users, creators, and Meta
- Target audience segmentation and rationale
- Product positioning, messaging, and "reasons to believe"
- Launch strategy, including phased rollout plans and markets
- Business goals, revenue forecasts, and success metrics
- Regulatory and privacy risks, mitigation strategies, escalation plans
- Customer journey and expected user experiences
- Pricing decisions and associated forecasts
- Creator/partner engagement plans and content strategies
- Post-purchase experience planning (support, retention, engagement)
- Internal and external comms strategies (including Marcom and PR)
- Measurement plans to assess launch performance
- Risks and open decisions across GTM (go-to-market) phases
- Dependencies across teams including engineering, design, comms, legal, policy, operations, and partnerships
- Final milestone approvals and ownership of GTM deliverables

My role required deep visibility into internal product decisions, safety risks, and regulatory implications.

## II. Knowledge of Underage Users on Horizon Worlds

When I worked at Horizon Worlds, it was a widely known issue that children (including users under the age of 13) were accessing Horizon Worlds by misrepresenting their ages, logging in with accounts registered as adults, thereby bypassing age-related restrictions. When I onboarded, the outgoing Product Marketing Manager (PMM) Director, Meaghan Fitzgerald briefed me that the presence of children under the age of 13 was a significant risk to the business, and this knowledge was corroborated through multiple channels:

### A. Employee Reports

On August 23, 2022, employee Karon Wheeler posted in the internal Black@ Workplace group detailing encounters with young users who directed racially pejorative terms such as "monkey" at him, an ethnic slur. He also recounted instances where children (including users under the age of 13) disrupted virtual cooking experiences by sabotaging the activities and using offensive language. Mr. Wheeler further described environments in Horizon Worlds populated by young individuals who persistently used profanity and racial slurs. The response by leadership was more focused on mitigating the complaint rather than addressing the underlying issues. I originally became aware of this post because it was mentioned by Kartik Santhanakrishnan, sent to me by multiple members of the team, and discussed by Brett Vogel and Vishal Shah, according to Brett.

### B. Creator Feedback

In November 2022, I hosted a Horizon Creator Roundtable in San Francisco, where in addition to covering the rampant and overt racism in the product, creators explicitly stated that the influx of underage users into their developed worlds posed significant challenges to maintaining safe communities. Panelists included:

- Vidita Subbarao, Meta Social Impact
  - Joe Mancini, Meta Reality Labs Trust
  - Ashley Miles, Meta Avatars and Identity
  - Jeremy Sharff, Meta Horizon
  - Shards (Richard), Metaverse Creator
  - Hardywest (Khaleem), Metaverse Creator
  - HyperJoule (Juliann), Metaverse Creator
  - PigeonNo12 (Melissa), Metaverse Creator
  - Flutt3r (Kiernan), Metaverse Creator
- The audience included my manager Brett Vogel, Vice President of Product Marketing and his Metaverse Product Marketing Management (PMM) team, including my team and my peers leading product marketing for Metaverse virtual goods and the Quest games ecosystem and all of the people who reported to us, responsible for informing product development, driving product growth, and leading effective go-to-market strategies.

- The internal prep materials for this event included screenshots of Mr. Wheeler’s Black@ post, and were reviewed by all panelists as well as members of Horizon’s leadership team, including Kartik Santhanakrishnan, Joe Bentley, Jeff Lin, and Yoav Shapira. They also reviewed notes after the event.

## C. Media Reporting

External media sources highlighted concerns regarding underage users on the platform, bringing public attention to the issue. These articles were circulated and discussed regularly, without appropriate action or accountability.

“This is Life in the Metaverse” is a New York Times article by Kashmir Hill that was circulated widely within the product organization on the day it was published (10/7/22).

It includes, “Despite Meta’s warnings, every time I went into the metaverse, I inevitably ran into children. During one of my first visits to the Plaza, on a Monday afternoon in July, a guy in a gray blazer named Dustin excitedly told me that he had joined Horizon the day before and had spent eight straight hours there. He invited me to play a zombie-shooting game in a shopping mall. When tiny versions of the blocky, green zombies appeared, I exclaimed, “They’re little kids!” “So am I,” he said, before adding, “Well, not that little.” Dustin told me that he was 11, squarely in the camp of people whose brains were more threatened by the device than by the undead. As other journalists have discovered, there are tons of young people running around Horizon. On the upside for Meta, this means the company finally has a product that appeals to the generation that has largely rejected Instagram and Facebook. Though Horizon is an 18-and-over app, community guides told me that they kicked out only users younger than 13, and only if users explicitly revealed their age.”

## D. Executive Playtests

Within Horizon, even employees were not using the product regularly due to the negative experience with stability/performance issues as well as the pervasive harassment by underage users in public spaces within Horizon Worlds.

During one Q&A, Meta CTO Andrew Bosworth shamed the teams for not spending more time in the product, where he needed to instead take responsibility for demanding hypergrowth of a product that even employees didn’t want to use due to product stability issues and virtual spaces dominated by screaming and swearing children (including users under the age of 13).

Executives, including myself, Gabe Aul, Vishal Shah, Yoav Shapira, Joe Bentley, Kartik Santhanakrishnan, Brett Vogel, and Jeff Lin, participated in organized playtests starting October 31, 2022. We struggled to communicate over very young, high pitched children’s voices screaming at us from behind adult accounts. Jeff Lin and Vishal Shah’s

solution to this was to begin playtesting closed worlds and games that our team was developing, instead of addressing the reality of our experience and how it confirmed what employees, users, and creators had been reporting: there were children under the age of 13 in Horizon, everywhere.

## E. Internal Terminology and Documentation

### 1. Intentional Omission of Information

There was a general directive to avoid documenting discussions related to the presence of teens and children (users under 13) on the platform. Specifically, I was directed on separate occasions and in different contexts by Jeff Lin, Brett Vogel, Kartik Santhanakrishnan, Yoav Shapira, Joe Bentley, and Vishal Shah to not document conversations or decisions about our knowledge or plans related to kids due to “legal risks.”

Notably, an agenda item from a March 27, 2023, Horizon leadership meeting, which was subsequently canceled, included:

*"Async FYI: in-progress escalation around timing of teens launch. Not listing details here. Might move a week later (4/17 -> 4/24), not due to work in progress, but comms/GTM [go-to-market] timing risk and RL[Reality Labs]-level alignment on use of age prediction. (Yoav Shapira, Sergey Meshcheryakov)"*

The phrase "Not listing details here" suggests an intentional omission of information, and is used in context of the teens launch, and the suggestion of discussing alignment on use of age prediction begs the question, what decision was being made, based on what data?

I urge the FTC to investigate Meta's age prediction algorithms, associated tests and risk analyses, and any related practices.

### 2. Shift from TAYA to STAYA

Meta employed the acronym TAYA ("teens and young adults") to describe users aged 13 and above. However, upon accessing internal documents on my last day of employment (January 2024), I observed a shift to the acronym STAYA ("stated teens and young adults"), likely indicating a reliance on self-reported age data, and a potential acknowledgement of Meta's inability or unwillingness to verify, which demands investigation.

### 3. Teens as Core Audience

In December 2022, internal Meta research confirmed that teens were the core audience most likely to embrace Horizon. This research is referenced



in Workplace note ID 2F1707463052923132, and I urge the FTC to request it directly from Meta.

### III. Prioritization of Growth Over Safety

Throughout my experience, the emphasis at Horizon was consistently on user growth, with safety considerations managed by leadership like liabilities to be minimized. Horizon Worlds was initially presented as a platform fostering inclusion and belonging, exemplified by hero scenarios like providing a safe space for marginalized individuals. In reality, it became a breeding ground for unchecked racism, sexual harassment, bullying, and child endangerment.

My responsibilities included leading the go-to-market strategy for the product expansion, including extending to mobile platforms ("cross screens") and opening up access to teens and later children, as well as expanding into several international markets with differing regulatory and privacy requirements.

#### A. Zuckerberg and Bosworth Move to Minimize Accountability

In July 2022, during my onboarding to Horizon, Meaghan Fitzgerald, Product Marketing Director, invited me to a meeting with Sonya Hartmann, Product Marketing Lead, and Landon Yuan, Product Marketing Lead. In that meeting, Meaghan emphasized that teens and young adults were the most important strategic priority for the product. Because of the complexity of online privacy regulations, she explained that leadership, including Andrew Bosworth and Mark Zuckerberg, wanted us to move away from what they viewed as a "reactive world where Meta is responsible for everything," and instead reframe the narrative around "how we provide people controls." This conversation made clear that product strategy was being shaped not around safeguarding children, but around legal minimization and reputational risk.

#### B. Marketing Raised Red Flags About Safety, Quality, and Truth in Advertising

While onboarding to the team, Kerry Antos, Marketing Director, expressed her professional concerns to me directly, about launching a major marketing campaign amidst rampant product and safety concerns. She asserted that Meta could not in good faith make promises in advertising that could not be delivered on (e.g. showing a product experience that was smooth if reality was glitchy, showing a product experience that includes children while we don't have protections for them), which would likely create PR and legal blowback. She expressed concerns about the presence of children and teens including frequent slurs/harassment within the experience, as well as product stability issues.

Ms. Antos reported being dismissed by the Product Team, specifically Jeff Lin, as well as Product Marketing, the team I'd just taken responsibility to manage. When I investigated,

these Product Marketers reported feeling caught between Ms. Antos's apprehensions and the product team's relentless pressure to continue our growth plan. This included multiple reported incidents of men, specifically Jeff Lin, yelling and bullying women in professional forums like product reviews and pillar leadership meetings.

### C. Escalating Safety Concerns Led to Exclusion, Not Action

When I raised these safety concerns in leadership forums, I was instructed by Mr. Lin to suppress Ms. Antos's objections. Specifically, Mr. Lin asked how fast I could “shut her up” and “now let’s see if you’re as good as they say you are.”

Upon my continued refusal, I was excluded from subsequent leadership meetings but continued voicing concerns in other forums and through empowering my reports to advocate for responsible product decisions amidst tensions between growth and child safety.

### D. Meta Planned to Launch in VR to Teens Without Parental Control Interface

A clear example of this came when Horizon was preparing to launch the Oculus headset app to teens, originally scheduled for September 6, 2022. The plan included safety measures such as personal boundaries and garbled voice by default, along with parental education materials that implied parental controls. However, the team knew that there would be a nearly two-week gap between launch and when the required parental controls would actually be available within the Horizon app on the Oculus headset.

I voiced my concerns about this with Vivek Sharma, Jeff Lin, Vishal Shah, meanwhile the Horizon Leadership Team Meetings had been removed from my calendar.

When the proposal to proceed launching with a gap in protections was subsequently brought to an August 2022 product review without accounting for the risk I’d identified, I spoke up in the meeting. Vivek Sharma dismissed me in the product review, asserting that policy and legal were on board with the plan to have a gap in protection.

### E. Shah Delayed Launch to Limit Risk to Meta, Not to Users

Within days of this meeting, Vivek Sharma’s departure from Meta was announced and Vishal Shah had made the decision to delay the teen roll out until the parental controls were ready in the Horizon app on Oculus.

Vishal never acknowledged my efforts to confront the safety risk to users and never took action to support reinstating me to the Horizon Leadership Team meeting after Vivek’s departure, suggesting that Vishal’s actions were more about limiting risk to the company than to its users.

My concern was reinforced when the question of whether or not to launch teens in VR ahead of adequate parental controls resurfaced twice more as a decision point in October and December, which I detail later in my testimony.

## IV. Meta's Willful Negligence and Obfuscation of Safety Concerns

### A. Acknowledgement of User Feedback Erases Presence of Children

In an internal memo dated September 15, 2022, Meta's VP of Metaverse, Vishal Shah, announced a pause in our roll out plans to address the quality issues, and acknowledged feedback from various stakeholders about quality and performance issues, stating the team would remain in a "quality lockdown" for the rest of the year to "ensure that we fix our quality gaps and performance issues before we open up Horizon to more users."

"Since launching late last year, we have seen that the core thesis of Horizon Worlds — a synchronous social network where creators can build engaging worlds — is strong," Shah wrote "But currently feedback from our creators, users, playtesters, and many of us on the team is that the aggregate weight of papercuts, stability issues, and bugs is making it too hard for our community to experience the magic of Horizon. Simply put, for an experience to become delightful and retentive, it must first be usable and well crafted."

Here, Mr. Shah confirms receiving product feedback from creators, users, playtesters, and employees and he does not name a primary theme of feedback we received internally and that was shared in public forums: concerns about the overwhelming presence of children in Horizon Worlds.

Mr. Shah's acknowledgment of persistent user feedback indicates that Meta was well aware of the systemic issues plaguing Horizon Worlds. I urge the FTC to subpoena this feedback, as it will further corroborate that Meta had extensive knowledge of users under 18 and under 13 accessing the platform and failed to take appropriate measures to address the issue. Instead of implementing effective safeguards, the company prioritized expansion while discouraging internal scrutiny.

### B. Privacy and Trust Teams Siloed

When a team member would escalate a gap in our plan such as inadequate monitoring tools, or not meeting local regulatory requirements in a given market, it was my job to understand and address the issue. In my efforts to get information, I was time and time again instructed to trust that the privacy and trust teams would develop solutions to comply with the various local parental control regulations.

Whenever I identified inconsistencies or raised concerns about how we would handle specific challenges related to underage users, I was told that these discussions needed

to remain confidential due to legal sensitivities. When I asked to see documents related to these topics, I was told they were privileged despite being the person at the company who was accountable for the successful go-to-market of Horizon.

### C. FTC Sues Epic for Child Data Violations while Bosworth Increase Launch Pressure

In October 2022, Andrew Bosworth pushed for a teen launch by mid-December, despite internal feedback that this was not feasible. That same week, the FTC announced its lawsuit against Epic Games for violations related to children's data.

PMM circulated the Epic Games news to stress the importance and sensitivity, and delivered a three-scenario risk analysis: (1) launching mid-December as requested, (2) a mid-January launch, or (3) combining the rollout with mobile in H2 2023. We ultimately aligned on January 18, 2023 as the new launch date.

As we approached the new January launch date, another pre-beta teen review occurred in December 2022. It became evident that we still did not have the adequate parental control interface, and that we also still did not meet regulatory requirements in multiple international markets.

### D. Those Accountable Denied Access

Multiple attempts to escalate my request to be reinstated in the leadership room so that I could continue to monitor and influence these decisions were ignored or dismissed, including by HR and Business Operations personnel who supported executives such as Vishal Shah and Vivek Sharma. Brett Vogel, after returning from a month-long sabbatical, also declined to take action.

They did not want me to fix it, they wanted me to make it go away. When I wouldn't, they made me go away.

## V. Meta Expanded Horizon to Teens and Children Despite Known Risks

My mental health leave began in February 2023 and I do not have personal knowledge of what transpired inside the company after that date, aside from documents I viewed as my employment was ending, in January 2024. But from publicly available information, it is clear that despite the clear risks, Meta proceeded with its expansion plans:

- In April 2023, Horizon Worlds was officially launched to teenagers
- In November 2024, Horizon expanded to include children 10+

Meta refused to acknowledge feedback at the time, and it continues to ignore it today. Horizon Worlds should never have been opened to teens without first addressing the rampant issue of underage users infiltrating the platform.

A cursory internet search reveals that even casual users can identify the severity of the problem. The following are verbatim posts from a public Reddit discussion in early 2024:

- "The problem? Children. I get on to play today, and half the kids in there sound like they are 8 years old. They are just yelling, and they don't know how to do anything... so basically my experience is ruined."
- "I was truly surprised that Meta Horizons seems to consist almost entirely of children (and young ones at that)."
- "As someone else said, I also had to delete it. I thought it was going to be a really cool social area and whatever. Instead, everywhere screaming kids, this room, that room, screeching awfulness. I ended up deleting it the same day I got my Quest 3."
- "Same thing—that's why I stopped going into Horizon World. Plus, lots of them kids are kind of racist. You don't know how many times I heard the N-word. It's disgusting, really."
- "Lil mini Klansmen is what they are, lol."
- "When I go into Horizons, it sounds like a daycare."
- "I met a little boy while working in Immersed. He gave me his name, personal information, where he lived, what his parents did for a living, and what Santa Claus brought him last Christmas (I didn't ask for any of that information, btw). But yeah, it freaked me out how easy it could be to do terrible stuff."
- "I just tried Horizon Worlds for the first time just recently and instantly felt like a creep for being there due to all the children screaming and whatnot, and left. I felt like a 50-year-old man at the playground."
- "Same! But I'm a woman. It was an instant turn-off. It's all little kids, and they're so obnoxious and immature. It felt creepy being on Horizons."
- "I got really into Super Rumble, but the kids ruined it. Had a woman who sounded like 25-30 in the game, and several kids were just screaming, 'SHUT UP GRANDMA!'"
- "HOLY HELL, the amount of kids is crazy! All they do is yell and curse at each other. How is this supposed to be enjoyable? I went into the pizza game, and someone was running around with a knife yelling, 'I'm going to kill you.'"

These public statements align precisely with the concerns raised internally at Meta. They reinforce what employees, developers, and executives already knew: Horizon Worlds is rife with child endangerment, harassment, and inappropriate interactions.

## VI. The Motivation Behind Horizon's Growth Push

Meta's aggressive push for Horizon Worlds was not motivated by a genuine belief in the product's value but rather by financial necessity. The company's core advertising business faced significant disruption following Apple's iOS 14 privacy updates, which limited the effectiveness of targeted ads.

When Brett Vogel first described the Metaverse opportunity to me, he explained that Meta needed Horizon and the broader Metaverse initiative to generate new revenue streams as quickly as possible due to the revenue disruption caused by iOS 14. I was familiar with the expected revenue disruption caused by iOS 14, because I had led the risk assessment for the partnerships organization.

iOS 14's impacts ultimately caused a 36 point profit drop and Meta's first revenue decline since their IPO.

This financial pressure led to a culture where safety was treated as an afterthought, despite repeated warnings from employees, creators, and users. Horizon Worlds was staffed largely by a long-standing predominantly male leadership team that had been generously resourced, rarely scrutinized, and largely insulated from scrutiny.

In contrast, my role was to instill go-to-market rigor: to bridge product vision with real-world readiness, to ensure regulatory alignment, and to translate strategy into responsible execution. At Horizon, raising risks was viewed not as leadership, but as disloyalty. Those who challenged the status quo, especially women, were bullied, sidelined, ignored, or removed, at the expense of the children and vulnerable users they were trying to protect.

## VII. Meta Will Not Disclose the Truth Without Legal Compulsion

Meta's public statements about age verification and child safety are designed to reassure regulators and the public, but they cannot be accepted at face value. As someone who directly witnessed how concerns were silenced, safety feedback was buried, and documentation was intentionally avoided due to "legal risk," I can attest that these public-facing claims often stand in stark contrast to internal practices.

Without subpoena, regulators and the public will only see the polished narratives Meta wants them to see, not the suppressed data, the silenced employees, or the buried risk assessments that reveal the true state of harm.

Even though Meta now states that it is using AI to detect underage users, the same claims were made as early as 2022, when internal teams were already raising red flags about the overwhelming presence of children on the platform.

Reports still confirm, as recently as last November, in WIRED's *Meta Horizon Worlds Taken Over by Children* which includes: "Pop into a VR realm like Meta's Horizon Worlds for even a moment, and an army of kids in their digital avatars will swarm all around you almost everywhere you go—waving, laughing, jumping, tossing digital objects, and shouting everything from high-pitched shrieks to straight up racial slurs. That's right, the metaverse is alive and, well ... it's populated primarily by children... Horizon still has adult fans, and in their eyes, the kids are not alright. You can find thread after thread on Reddit of people complaining about children ruining the vibes of virtual spaces like VR chat. Or hear horror stories about kids getting into

sketchy situations—being exposed to bullying or harassment by other kids or, more worryingly, adults.”

This report indicates hearing “high pitched shrieks to straight up racial slurs” from pre-teens (“adolescents,” “children”) which would have indicated children were using adult accounts, given the reporters were not approved contacts of the children.

Responses on Reddit to the WIRED article include:

- “I've avoided playing in multiplayer environments since getting my Quest 3 a couple of months ago for this very reason. Getting my ears raped by kids that were obviously well under 10 years of age just once was enough for me. No interest in online social activities until I can be guaranteed I'm not going to have to suffer other peoples unsupervised and out of control 6 year olds. Bit hard to focus on relaxing and playing a game when you have someone's retarded toddler screaming at you "HEY HEY HEY HEY, CAN YOU HEAR ME, CAN YOU HEAR ME CAN YOU HEAR ME" followed by ear bleeding screams when things don't go their way. I've never encountered such a thing on any other 'gaming' platform I've used.”
- “I jumped on for the first time and found 3 kids prob 8 years old talking about pedophiles or something.”
- “every VR social spaces have been transformed into childcare centers and you are the babysitter... “
- I got the quest three about a month ago, jumped into the horizon world heard all the children speaking and literally just left there and haven't returned since.

The urgency is not theoretical. Children are on this platform **now**. They are being exposed to inappropriate content **now**. And Meta continues to profit while treating underage users not as people to protect, but as numbers to grow. Every day that passes without oversight risks irreversible harm, and emboldens the normalization of corporate recklessness masquerading as innovation.

## VIII. Conclusion and Call for Investigation

Based on my direct experience and the evidence I have outlined, I urge the FTC to thoroughly investigate Meta's handling of child safety in Horizon Worlds. If investigated, Meta's internal discussions, including meeting notes, Workplace messages, and emails, will reveal that executives were aware of the underage user problem and deliberately chose to prioritize growth over safety.

The decision to expand Horizon Worlds to teens and pre-teens despite overwhelming evidence of the risks represents a fundamental failure of corporate responsibility.

In addition to investigating Meta's violations of COPPA, I urge the FTC to impose robust remedies that reflect the scale and knowing nature of the misconduct. Specifically:

1. **Ban Meta from monetizing the data of minors (under 18), especially biometric and behavioral data.**
  - This remedy is consistent with the FTC's announced intention to reopen and strengthen the 2020 Meta settlement order.
2. **Impose a permanent injunction on collecting or storing personal information from users under 13 without verified parental consent.**
  - Including the deletion of any data already collected from underage users improperly using standard accounts.
3. **Require independent audits of Meta's age verification and parental consent systems.**
  - Audits must be recurring, transparent, and include testing for circumvention (e.g., switching accounts, sharing headsets).
4. **Mandate development and deployment of AI-driven age estimation tools.**
  - Meta should be required to use existing facial and behavioral data to estimate age and flag underage use for review.
5. **Order a redesign of Horizon Worlds to ensure compliance by default.**
  - Horizon Worlds must be rebuilt with COPPA compliance at its core: safe by default, opt-in communications, locked settings for unknown users, and clear visual cues for age-specific interactions.
6. **Require public transparency reports on Horizon Worlds' underage user base and safety incidents.**
  - These reports should include anonymized statistics on flagged accounts, enforcement actions, and platform usage trends by age.

I submit this sworn statement to aid the FTC in holding Meta accountable for its negligence and failure to protect children on its platform.

**Sworn and Signed,**



**Kelly Stonelake,**

Former Director of Product Marketing, Developer Platform and Horizon Worlds





<b>Game/Experience Visited:</b> Bobber Bay Fishing and Horizon Central	<b>Video File Reference Numbers:</b> BB1, BB2
<b>Game/Experience Description:</b> Users in Bobber Bay Fishing join a small number of other players on a cartoonish island where they use virtual fishing poles to catch fish. Players log the different fish they catch to win rewards. Players can speak to one another while they play, but many users choose to play in silence. Bobber Bay Fishing is rated 10+.	
<b>Total Users Identified During Visit:</b> 22	<b>Total Users with Child Voices:</b> 9
<b>Username of Users with Child Voices (Redacted):</b>	

<b>Game/Experience Visited:</b> Creepy Cabin	<b>Video File Reference Numbers:</b> CC1, CC2
<b>Game/Experience Description:</b> Users in Creepy Cabin join other players in exploring a scary-looking two story house. Inside the house is a large movie screen that plays disturbing short horror films. Creepy Cabin is rated 13+.	
<b>Total Users Identified During Visit:</b> 24	<b>Total Users with Child Voices:</b> 7
<b>Username of Users with Child Voices (Redacted):</b>	

<b>Game/Experience Visited:</b> Gatsby's Bar	<b>Video File Reference Numbers:</b> GB1, GB2
<b>Game/Experience Description:</b> Gatsby's Bar is a virtual gathering space for users to explore and chat. It features mini-games and various social settings like a beach and karaoke bar. Gatsby's Bar is rated 18+ and has its own age verification method using the Quest hand controllers to attempt to measure a player's wingspan.	

<b>Total Users Identified During Visit:</b> 60	<b>Total Users with Child Voices:</b> 0
<b>Username of Users with Child Voices:</b> none	

<b>Game/Experience Visited:</b> Horizon Central	<b>Video File Reference Numbers:</b> HC1, HC2, HC3, HC4
<b>Game/Experience Description:</b> Horizon Central serves as a gathering space, town square, and jumping-off point for other curated games and experiences in Horizon Worlds. It is often staffed with Meta employees known as "Community Guides." Horizon Central is rated 10+.	
<b>Total Users Identified During Visit:</b> 128	<b>Total Users with Child Voices:</b> 30
<b>Username of Users with Child Voices (Redacted):</b>	

<b>Game/Experience Visited:</b> MetDonald's	<b>Video File Reference Numbers:</b> MD1, MD2
<b>Game/Experience Description:</b> MetDonalds is a virtual restaurant modeled after the famous franchise McDonalds. Users interact with one another by playing "make believe" restaurant, working behind the counter, ordering off the menu at the cash register, and shouting through the drive-thru window. MetDonalds is rated 10+.	
<b>Total Users Identified During Visit:</b> 47	<b>Total Users with Child Voices:</b> 19
<b>Username of Users with Child Voices (Redacted):</b>	

<b>Game/Experience Visited:</b> The Office World	<b>Video File Reference Numbers:</b> OW1, OW2
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**Game/Experience Description:** The Office World is a VR experience designed and published by NBCUniversal. Players gather in a virtual recreation of Dunder Mifflin from the TV show “The Office.” They can explore the office's various rooms and participate in mini-games. The Office World is rated 13+.

**Total Users Identified During Visit:** 20

**Total Users with Child Voices:** 9

**Username of Users with Child Voices (Redacted):**

**Game/Experience Visited:** Pizza Kitchen

**Video File Reference Numbers:** PK1, PK2

**Game/Experience Description:** Pizza Kitchen is a game in which users gather in a cartoonish Italian restaurant. Players can make pizzas by rolling virtual dough, adding toppings, and putting it into a virtual pizza oven. Pizza Kitchen is rated 10+.

**Total Users Identified During Visit:** 36

**Total Users with Child Voices:** 19

**Username of Users with Child Voices (Redacted):**

**Game/Experience Visited:** Saber

**Video File Reference Numbers:** S1, S2

**Game/Experience Description:** Users in Saber join other players on a small rock island floating in lava. Players then battle with lightsabers until only one player is left on the island. Saber is rated 13+.

**Total Users Identified During Visit:** 29

**Total Users with Child Voices:** 14

**Username of Users with Child Voices (Redacted):**

<b>Game/Experience Visited:</b> Spin the Bottle	<b>Video File Reference Numbers:</b> SB1, SB2
<b>Game/Experience Description:</b> Spin the Bottle is a game in which multiple players are stationed at a round table with a spinning bottle in the center. When the bottle stops at a particular user, that user is given a gun and gets to choose which other player he or she will shoot and kill. Spin the Bottle is rated 13+.	
<b>Total Users Identified During Visit:</b> 27	<b>Total Users with Child Voices:</b> 15
<b>Username of Users with Child Voices (Redacted):</b>	

<b>Game/Experience Visited:</b> Super Rumble	<b>Video File Reference Numbers:</b> SR1, SR2
<b>Game/Experience Description:</b> Super Rumble is a multi-player, first-person shooting game. Players are transported to a virtual arena where they use futuristic virtual guns to shoot one another. Super Rumble is rated 10+.	
<b>Total Users Identified During Visit:</b> 15	<b>Total Users with Child Voices:</b> 0
<b>Username of Users with Child Voices:</b> none	

<b>Game/Experience Visited:</b> VR Classroom	<b>Video File Reference Numbers:</b> VRC1-1, VRC1-2, VRC2-1, VRC2-2
<b>Game/Experience Description:</b> Users in VR Classroom explore a virtual school where they play "make believe" with many other players. Users can play in the music room, pretend to be teachers, and give announcements from the principal's office. VR Classroom is rated 10+.	
<b>Total Users Identified During Visit:</b> 67	<b>Total Users with Child Voices:</b> 35
<b>Username of Users with Child Voices (Redacted):</b>	

<b>Game/Experience Visited:</b> World Class Boxing	<b>Video File Reference Numbers:</b> WCB1, WCB2
<b>Game/Experience Description:</b> Users in World Class Boxing gather with other players in a large boxing gym. Players wait for a turn to fight one another in a large boxing ring in the center. The creator of the game frequently advertises virtual goods and crypto projects. World Class Boxing is rated 13+.	
<b>Total Users Identified During Visit:</b> 35	<b>Total Users with Child Voices:</b> 13
<b>Usernames of Users with Child Voices (Redacted):</b>	

<b>Total Users Present</b>	<b>Total Users with Child Voices</b>	<b>Percentage of Users with Child Voices</b>
510	170	33%

Game/Video Reference ID	Date of Recording	Total users in video	Users with child voices	Usernames of users with child voices (redacted)	Reconciled Total: Users in video	Reconciled Total: Users with child voices																																												
Bobber Bay Fishing/BB1	11/12/24	Researcher 1: 14	Researcher 1: 6	[REDACTED]	14	6																																												
		Researcher 2: 14	Researcher 2: 7				Bobber Bay Fishing/BB2	11/26/24	Researcher 3: 8	Researcher 3: 3	8	3	Researcher 2: 9	Researcher 2: 3	Creepy Cabin/CC1	11/01/24	Researcher 1: 8	Researcher 1: 2	7	2	Researcher 2: 7	Researcher 2: 2	Creepy Cabin/CC2	11/17/24	Researcher 1: 6	Researcher 1: 5	17	5	Researcher 2: 17	Researcher 2: 5	Gatsby's Bar/GB1	11/17/24	Researcher 1: 55	Researcher 1: 0	54	0	Researcher 2: 54	Researcher 2: 0	Gatsby's Bar/GB2	4/7/25	Researcher 3: 6	Researcher 3: 0	6	0	Researcher 2: 6	Researcher 2: 0	VR Classroom/VRC1-1	11/17/24	Researcher 1: 17	Researcher 1: 10
Bobber Bay Fishing/BB2	11/26/24	Researcher 3: 8	Researcher 3: 3		8	3																																												
		Researcher 2: 9	Researcher 2: 3				Creepy Cabin/CC1	11/01/24	Researcher 1: 8	Researcher 1: 2	7	2	Researcher 2: 7	Researcher 2: 2	Creepy Cabin/CC2	11/17/24	Researcher 1: 6	Researcher 1: 5	17	5	Researcher 2: 17	Researcher 2: 5	Gatsby's Bar/GB1	11/17/24	Researcher 1: 55	Researcher 1: 0	54	0	Researcher 2: 54	Researcher 2: 0	Gatsby's Bar/GB2	4/7/25	Researcher 3: 6	Researcher 3: 0	6	0	Researcher 2: 6	Researcher 2: 0	VR Classroom/VRC1-1	11/17/24	Researcher 1: 17	Researcher 1: 10	15	10	Researcher 2: 15	[REDACTED]				
Creepy Cabin/CC1	11/01/24	Researcher 1: 8	Researcher 1: 2		7	2																																												
		Researcher 2: 7	Researcher 2: 2				Creepy Cabin/CC2	11/17/24	Researcher 1: 6	Researcher 1: 5	17	5	Researcher 2: 17	Researcher 2: 5	Gatsby's Bar/GB1	11/17/24	Researcher 1: 55	Researcher 1: 0	54	0	Researcher 2: 54	Researcher 2: 0	Gatsby's Bar/GB2	4/7/25	Researcher 3: 6	Researcher 3: 0	6	0	Researcher 2: 6	Researcher 2: 0	VR Classroom/VRC1-1	11/17/24	Researcher 1: 17	Researcher 1: 10	15	10	Researcher 2: 15	[REDACTED]												
Creepy Cabin/CC2	11/17/24	Researcher 1: 6	Researcher 1: 5		17	5																																												
		Researcher 2: 17	Researcher 2: 5				Gatsby's Bar/GB1	11/17/24	Researcher 1: 55	Researcher 1: 0	54	0	Researcher 2: 54	Researcher 2: 0	Gatsby's Bar/GB2	4/7/25	Researcher 3: 6	Researcher 3: 0	6	0	Researcher 2: 6	Researcher 2: 0	VR Classroom/VRC1-1	11/17/24	Researcher 1: 17	Researcher 1: 10	15	10	Researcher 2: 15	[REDACTED]																				
Gatsby's Bar/GB1	11/17/24	Researcher 1: 55	Researcher 1: 0		54	0																																												
		Researcher 2: 54	Researcher 2: 0				Gatsby's Bar/GB2	4/7/25	Researcher 3: 6	Researcher 3: 0	6	0	Researcher 2: 6	Researcher 2: 0	VR Classroom/VRC1-1	11/17/24	Researcher 1: 17	Researcher 1: 10	15	10	Researcher 2: 15	[REDACTED]																												
Gatsby's Bar/GB2	4/7/25	Researcher 3: 6	Researcher 3: 0		6	0																																												
		Researcher 2: 6	Researcher 2: 0				VR Classroom/VRC1-1	11/17/24	Researcher 1: 17	Researcher 1: 10	15	10	Researcher 2: 15	[REDACTED]																																				
VR Classroom/VRC1-1	11/17/24	Researcher 1: 17	Researcher 1: 10		15	10																																												
		Researcher 2: 15	[REDACTED]																																															

Game/Video Reference ID	Date of Recording	Total users in video	Users with child voices	Usernames of users with child voices (redacted)	Reconciled Total: Users in video	Reconciled Total: Users with child voices		
VR Classroom/VRC1-2	11/17/24	Researcher 1: 12	Researcher 1: 10		12	10		
		Researcher 2: 0	Researcher 2: 10					
VR Classroom/VRC2-1	11/24/24	Researcher 3: 19	Researcher 3: 8			19	8	
		Researcher 2: 11	Researcher 2: 7					
		Researcher 4: 20	Researcher 4: 8					
VR Classroom/VRC2-2	11/24/24	Researcher 3: 21	Researcher 3: 7				21	7
		Researcher 2: 12	Researcher 2: 7					
		Researcher 4: 22						
Horizon Central/HC1	11/01/24	Researcher 1: 34	Researcher 1: 5				34	7
		Researcher 2: 35	Researcher 2: 7					
			Researcher 3: 7					

Game/Video Reference ID	Date of Recording	Total users in video	Users with child voices	Username of users with child voices (redacted)	Reconciled Total: Users in video	Reconciled Total: Users with child voices			
Horizon Central/HC2	11/07/24	Researcher 1: 45	Researcher 1: 12		45	12			
		Researcher 2: 36	Researcher 2: 12						
		Researcher 3: 46							
Horizon Central/HC3	11/10/24	Researcher 1: 36	Researcher 1: 7			34	7		
		Researcher 2: 21	Researcher 2: 7						
		Researcher 3: 34							
Horizon Central/HC4	11/10/24	Researcher 1: 16	Researcher 1: 4				15	4	
		Researcher 2: 16	Researcher 2: 4						
MetDonalds/MD1	11/01/24	Researcher 1: 10	Researcher 1: 6					8	6
		Researcher 2: 8	Researcher 2: 6						
MetDonalds/MD2	11/17/24	Researcher 1: 39	Researcher 1: 13					39	13



Game/Video Reference ID	Date of Recording	Total users in video	Users with child voices	Usernames of users with child voices (redacted)	Reconciled Total: Users in video	Reconciled Total: Users with child voices
		Researcher 2: 39	Researcher 2: 13	[REDACTED]		
Spin the Bottle/SB1	10/30/24	Researcher 1: 9	Researcher 1: 7		9	7
		Researcher 2: 9	Researcher 2: 7			
Spin the Bottle/SB2	11/26/24	Researcher 3: 22	Researcher 3: 6		18	8
		Researcher 2: 18	Researcher 2: 9			
			Researcher 4: 8			
Pizza Kitchen/PK1	04/07/24	Researcher 3: 14	Researcher 3: 7		14	6
		Researcher 2: 14	Researcher 2: 5			
			Researcher 4: 6			
Pizza Kitchen/PK2	11/12/24	Researcher 1: 22	Researcher 1: 11		22	13
		Researcher 2: 22	Researcher 2: 13			
			Researcher 3: 13			

Game/Video Reference ID	Date of Recording	Total users in video	Users with child voices	Usernames of users with child voices (redacted)	Reconciled Total: Users in video	Reconciled Total: Users with child voices
Saber/S1	11/10/24	Researcher 1: 18	Researcher 1: 8		18	8
		Researcher 2: 18	Researcher 2: 9			
Saber/S2	04/07/25	Researcher 3:11	Researcher 3:7		11	6
		Researcher 2: 11	Researcher 2: 6			
			Researcher 4: 6			
Super Rumble/SR1	11/26/24	Researcher 3: 7	Researcher 3: 0		6	0
		Researcher 2: 6	Researcher 2: 0			
Super Rumble/SR2	11/10/24	Researcher 2: 7	Researcher 2:0	9	0	
		Researcher 3: 9	Researcher 3: 0			
		Researcher 4: 9				
The Office World/OW1	11/07/24	Researcher 1: 16	Researcher 1: 5	13	5	
		Researcher 2: 12	Researcher 2: 5			
		Researcher 3:13				
The Office World/OW2	04/07/25	Researcher 3: 7	Researcher 3: 5	7	4	
		Researcher 2: 8	Researcher 2: 3			





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childhood beyond brands

Game/Experience	Total Users	Users with Child Voices
Bobber Bay Fishing and Horizon Central	22	9
Creepy Cabin	24	7
VR Classroom	67	35
Horizon Central	128	30
MetDonalds	47	19
Spin the Bottle	27	15
Pizza Kitchen	36	19
Saber	29	14
World Class Boxing	35	13
The Office World	20	9
Gatsby's Bar	60	0
Super Rumble	15	0
<b>Totals:</b>	<b>510</b>	<b>170</b>



## Appendix E

The following contains a selection of reviews of Meta Horizon Worlds published in the Meta App Store<sup>1</sup> between July 1, 2024 and December 9, 2024. All reviews were submitted by “verified users” of Horizon Worlds, that is, users who have “purchased, obtained or redeemed [the] app through the Quest Store or App Lab, and [have] used the app.”<sup>2</sup> Image files with time stamps available upon request.

I. Review Analysis Summary	2
II. Reviews Mentioning the Presence of Children	2
III. Reviews Mentioning Children and Bullying or Harassment	20
IV. Reviews Mentioning Children and the Risk of Sexual Predation	27

### I. Review Analysis Summary

Total Reviews Analyzed	Reviews Referencing the Presence of Children	Reviews Referencing Online Harms
626	112	26

### II. Reviews Mentioning the Presence of Children

★ ★ ☆ ☆ ☆ 19 hours ago

Too many kids. Need a setting so you're only in rooms with people 18+

The plague of children

★ ★ ☆ ☆ ☆ A day ago

Welcome to woke meta vr chat were they let children abuse the report system for the sake of trolling

<sup>1</sup><https://www.meta.com/experiences/meta-horizon-worlds/2532035600194083/?srsltid=AfmBOopSEFUZ-8gzMUxTw9DY8K-Hb8fKC6tgXyGJhgYXyERDyXveQGe2>

<sup>2</sup>[https://www.meta.com/legal/quest/verified-user-reviews/?utm\\_source=www.meta.com&utm\\_medium=dollyredirect](https://www.meta.com/legal/quest/verified-user-reviews/?utm_source=www.meta.com&utm_medium=dollyredirect)

### Too overrun with kids



★ ★ ☆ ☆ ☆ 2 days ago

This is a great concept and is a great app, however Meta has allowed Worlds to be overrun by foul mouthed kids to make this a pleasant experience for adults. If Meta wants this to be anything more than a lawless platform for children they need to address this problem as the potential adult audience will just keep moving over to the alternatives. What a waste of Meta's millions just to create a kiddy bullying platform.

### Nice experience



★ ★ ★ ☆ ☆ 3 days ago

It's a good way to have fun, kill some time and move a little bit at your own pace to learn your limit in VR. Too much kids sometimes, but you can mute them. No offense, but I like calm 😊

### Stop 🚫 the kiddy themes..

★ ★ ☆ ☆ ☆ 4 days ago

Please, we need a world for adults. I don't really go to the 🌐 s because they're too childish

### Full of kids and bad language.



★ ☆ ☆ ☆ ☆ 4 days ago

Need to clamp down on kids acting like vultures and spoiling it for others. Also you need moderators to manage and monitor age brackets that talk to other age brackets. Grown men shouldn't be talking to children. It's creepy and somewhat violates your terms of use. Recent update: Still not changed. When did meta allow kids to have an FB account and, or be able to use bad language freely? Surely kids should be monitored and any foul or abusive language marked against the account. More than five flags and instant ban from meta world. The headset is still ok to use, just not the game.

[See less](#)

### Visiting Horizon World



★ ★ ★ ★ ☆ 8 days ago

Thanks I luv that I can go into different worlds and explore them. Also I enjoy being able to go to certain worlds and play my card games or just kick it at the laugh house or in the clubs. Now the kids in some worlds can be a bit annoying but it's manageable.

### Good, but can always be better!



★ ★ ★ ★ ☆ 13 days ago

Although Meta brings everyone together, some of us would like a little segregation meaning rooms where not so many kids are playing, but rather adults can go in there and enjoy the worlds and explore without crying and immaturity all in your ear.

### Horizon Worlds is Overrun By Kids

★ ★ ★ ☆ ☆ 17 days ago

Meta has to do better to tone down the influence of loud obnoxious kids. More adult venues would be nice.



Drew



Helpful | 2

### Endless possibilities

★ ★ ★ ★ ★ 17 days ago

Horizon is a good name for what Meta is creating here. I think that it symbolizes looking ahead..investing in the future. Yes..there is a lot of things that don't work right. There's confusion and glitches and bugs and bratty kids that can be discouraging . But there's also a lot of stuff that does work. And everywhere I look I see so much creative wonder that it's breathtaking to think what might be possible tomorrow.



Leeda



Helpful | 4

### Great way to spend some time!

★ ★ ★ ★ ☆ 19 days ago

Ok, right up front: there are a TON of little kids in there. But honestly most of them are really friendly and try to be helpful. I have six of my own, so I don't mind the all the racket, and it's actually pretty fun to see the way they get so excited about everything. There are some exceptions, thank you "block feature"! Now, there are a huge variety of experiences of varying degrees of quality. There is no shortage of things to do and see. If you've ever played Playstation Home you'll know ow what to expect. My only critique would be that it's art design can be a little too cartoony and simplistic. I'd like some spaces with a little more visual flair and polish. The hardware is capable of it.

[See less](#)

### Horizon worlds

★ ★ ★ ★ ★ 20 days ago

Great ideas that could do with small amounts of tweaking to be exceptional ideas. There needs to be a proper adult version of horizon worlds added. The standard horizon worlds are great from what I have experienced so far bit sometimes the kids are way over the top with all the screaming and such. Apart from that get out there and get discovering, there are some amazing friendly people out there that make the horizon worlds a great place to hang out and have a fun time in.

[See less](#)

### Vantellatina.B

★ ★ ★ ★ ☆ 23 days ago

I agree with shelly 😊 the game is amaze but I do feel a bit like I'm babysitting when a bunch of children force me to team up lol they're adorable but also in the way a bit when i dont feel like being around hyper miniature ppl. I enjoyed a convo with someone on here who was my own age and who I could play with which was great! So a room with adults will maybe help some of us to feel less out of place.. you know.. somewhere you don't get called grandma at 30 yrs old 😊 5stars if you could make that happen 😊

[See less](#)

### Needs monitoring to restrict underage



★ ★ ★ ☆ ☆ 3 days ago

There should be more monitoring of players who are underage, acting up, foul language and just basically straight up rudeness.

### So fun



★ ★ ★ ★ ★ 4 days ago

The only suggestion I would make is maybe having a separation between kids and adults. Or an adult version and a kids version, it seems every time I get on to play a game it's flooded with kids who don't actually play the game lol



Brandi Smith-Wright  Helpful | 4

### Lots of annoying kids



★ ★ ☆ ☆ ☆ 2 days ago

sometimes when you're bored, you can troll them but they are everywhere and i have enough

### Awful experience.



★ ☆ ☆ ☆ ☆ 4 days ago

Something that had potential, but is overrun by children maybe six years of age, cussing and screaming in your ear. I hear it's the same experience at Population One, which is why I've avoided that game.

### Meta-horizons



★ ★ ★ ☆ ☆ 5 days ago

So the game is cool I have met a lot of people some good some bad (a lot of annoying people and kids as well) but that's just the internet for you. It's just annoying when bad people don't get ban for doing bad stuff but others will get banned randomly for no reason. But I digress.



What happened!!



★ ☆ ☆ ☆ ☆ 7 days ago

There are to many little kids and there are really annoying and the games are no longer fun this game used to be fun but now it just sucks


Bring echo back!



★ ★ ★ ★ ★ 7 days ago

This game got replaced for echo vr the game is terrible there's little kids everywhere and the game looks terrible do not get this game.



Everett Worley  Helpful | 1

Yikes



★ ☆ ☆ ☆ ☆ 9 days ago

Went in to check it out and was immediately met with a girl screaming at someone and jumping all over the place and then what sounded like a young boy going around and cussing, dropping the F bomb continually and getting in peoples faces. I couldn't figure out how to leave fast enough when he mentioned my name so I just turned my power off. I would like to check it out and tried twice but don't make it very far. I'll look to see if invisible mode is available.

[See less](#)

Age blocker options please



★ ★ ★ ☆ ☆ 8 days ago

Far too many screaming 6 year olds in the adult themed rooms.

### Adding to the misery



★ ☆ ☆ ☆ ☆ 10 days ago

Expected to put up with rude disrespectful kids and not respond EVER! I go in to Vr to recuperate and relax. I now can't connect with my friends get into games in horizon worlds nothing is working properly after paying £600 that is OTT policing.

### Meta 2



★ ☆ ☆ ☆ ☆ 11 days ago

I bought this for my grandkids you're suspending it November 1 I can't get the help I need to rectify the situation. You make it too hard for the people who spend their money to buy this for the children. I understand you have protection policies. But you're making it hard for the ones that's buying this and we can't fix it. I wasted money I want to refund.



Tee



Helpful | 3

### Easy fix



★ ☆ ☆ ☆ ☆ 11 days ago

Just ask some age knowledge questions. For different rooms and weed out the kids



Gunderbum



Helpful | 3

### Little kids



★ ★ ★ ☆ ☆ 11 days ago

These little kids are rude and not respectful. They have no manners and cuss worse than sailors. What can be done?



Broken



Helpful | 1

Only complaint

★★★★★ 13 days ago

More rooms for adults and maybe just keep the kids and adults separate



Ed.  Helpful | 1

The experience is nice

★★★☆☆ 14 days ago

except when the little kids start acting out. I think there should be a space for adults and a different one for kids



TheBat-IshNYC  Helpful | 2

어린이 놀이터입니다.

★☆☆☆☆ 5 days ago

I can only hear the children talking in the playground.



Charles shin  Helpful | 1


Knockoff knockoff vrchat

★★☆☆☆ 6 days ago

I get what they're going for with this (rec room but made specially for meta stuff) but what they actually have is just garbage. rec room itself is already just a worse but more kid-friendly version of vrchat, and now they have horizons which is even worse. even something as simple as the avatars are terrible. i can't see my own legs, the hands look pudgy and unnatural, the arms are about a third too short. there isn't even anything worth doing on here because everything they have is done better in every possible way by what they are trying to copy. also, ditch the kid friendly stuff entirely. this is a social media platform and children should not be allowed. allowing them is a crime, the moderation team should be actively finding and banning accounts that are being used by those under 13 (in the US, 13 is the minimum age for social media). it does still work ok though, so i'm not giving it one star.

[See less](#)





Unknown12345  Helpful | 1

### Not For Me

★ ☆ ☆ ☆ ☆ 8 days ago



I'm an older user and I prefer being alone when I am on Oculus so Worlds is not for me. I don't like running around where it sounds like little kids are running around. If Worlds works for others, that's fine but not for me. Also a lot of times I don't know what is going on in some of the Worlds.

 Ewolfman  Helpful | 3

### No Filtering for Culture Groups

★ ☆ ☆ ☆ ☆ 9 days ago



So I have jumped into at least 5 areas and they are always full of kids. You need a filter to find groups/worlds that have people came meet of the same culture etc.

 Roger Lee  Helpful | 0

### Getting there!

★ ★ ★ ★ ☆ 12 days ago

It's getting better. I've had fun with the new avatars and some of the 18+ experiences. We need more of those. Currently children dominate Horizon Worlds, and that's ok, because those kids are the future of VR and this platform, but there needs to be more, and less cartoony options for adults.


 undlsclos3d  Helpful | 1

### To many children

★ ☆ ☆ ☆ ☆ 13 days ago

I worked hard to pay for my quest I want to be able to use it without having to be surrounded by children I would love to use the meta horizon worlds but every time I make the mistake of booting it up I just hear children screaming, I know you can't take the kids away but at least start me off in a separate room and let me join different world from there, maybe make it where when logging into world you create a small person server and can go to worlds or invite others to yours, allow for customization of t

[See more](#)

 Skullimerp  Helpful | 2

### Meats horizon

★★★★☆ 14 days ago

It's a fun game, and I love the sounds in each of the games. But, one problem is that some kids on the game are very inappropriate. Maybe the creators of this game can fix that?



Minecraftgirl



Helpful | 0

### Nice game

★★★★☆ 14 days ago

Personally I'm a marvel nerd and the marvel games on this app are really cool it's nice but the most annoying thing is that there's always a little kid in every game I join it's so annoying but the games are really good so that's a up sid



venom



Helpful | 0

### Overrun by children

★★☆☆☆ 14 days ago

It's a cool concept, considering they did away with AltSpace. But it's really wild to be in some of these spaces where you think adults are running it, and it's an eleven-year-old child—for example, Meta Court.



Coro



Helpful | 0

### Hi

★★★★☆ 15 days ago

What they need to do is make a horizontal world just for kids. There's a lot of kids that I have met and they're really bad with their mouth. I believe that it will be something great for us. Grown-ups to just meet. In horizontal world. But we should get like a password that no kids will be allowed it will be so great. I don't know if other people have had that issue as well. [🔗](#)



PRECILLA REXACH



Helpful | 1

### Too many underage kids on here

★★★★☆ 15 days ago

Get rid of all the minors. Too many of them, 100% below the min age of 13. Doing a lot of swearing and sexual talk. Adults being appropriate. The "kids" are not.



Scott



Helpful | 0

### Great concept



★★★★☆ 18 days ago

So, Meta Horizon Worlds is interesting. I love the idea of you making and coding your own worlds and games that other people can play, and exploring what other people have made. However I do think there are some things that could be improved. First, I think there should be better age grouping, right now it seems that there are worlds for everyone, and worlds that are 18+. This is fine but it can be incredibly annoying when you're exploring a world, and there are young children screaming. I propose the categories of 12 and under, 13-17, and 18+. Additionally it would be nice if you could be put into a world with people your age. Next I would say the scripting guides could need an update. The tutorial world is cool, but I remember I couldn't get the recordings to play. It would also be cool if you could ask Meta AI a scripting question, and Meta AI looks at your code and overlays a possible solution. TL;DR - Cool concept, kids are annoying, scripting tools are needed.

[See less](#)



OutOfPlace Helpful | 1

### Really boring



★★☆☆☆ 16 days ago

All the world's are so basic, boring, shallow, and buggy. The game is ugly and the only thing you can do to have fun is just talk to other people (which you can do in any other multiplayer game). I had hope that this would improve over time but it feels like it hasn't evolved at all. It's also infested with kids which makes it impossible to find a decent room. Playing this game also made me have to submit ID to verify my age which is so ironic because the amount of 6 year olds in this game is insane Meta is wasting resources on this and they would be better off abandoning it and working on a new game on a new engine

[See less](#)



SaiyanPrincessYT Helpful | 2

### Let me outta here ..



★★☆☆☆ 20 days ago

You need to include activities that attract a mature audience, in addition to other fun things that people in their 40s + can enjoy. All I see are the same activities, mediocre portals to dull places and screaming children that I panically have to mute. Think outside the box 😊



Aqua Blau Helpful | 2

### Horizon has ruined the quest



★ ☆ ☆ ☆ ☆ 22 days ago

Spam me with horizon review requests? Here's an honest review. Nobody cared, cares or will ever care about horizon. Pushing a complete failure of an app on every user is horse \$\*#%. You completely ruined the phone app and you are completely ruining the quest experience. Now you are trying to pawn off your horizon OS to other manufactures? Who the heck wants to spend millions on hardware development just to run a failed Zuckerberg dream. The dream of VR is not satisfy 5-9 year old kids. October update: Why the heck is my App Library completely littered with links to different horizon worlds? Meta finally released an OS update to let users clean up their library & 2 weeks later you make it 200 times worse.. unbelievable.

[See less](#)



Chris Helpful | 17

### Worst experience ever



★ ☆ ☆ ☆ ☆ Sep 22 at 12:53 AM

ONLY LOOKED IN FOR 2 MINUTES HEARD NOTHING BUT SCREAMING KIDS WITHOUT SAYING A WORD I LEFT 1 DAY LATER I GET HIT WITH A BAN NO QUESTIONS ASKED WILL NEVER ENTER ANY OF THESE AGAIN.



Waybaked Helpful | 7

### Bad



★ ☆ ☆ ☆ ☆ Sep 17 at 12:57 PM

Lots of 2 yr olds saying the n word



posiedon Helpful | 4

### It's ok



★ ★ ★ ☆ ☆ Sep 15 at 3:56 AM

It's alright but please get rid of the younger kids under 18 like 12,11, and 10 y/o





Logan Neal Helpful | 0

Too many kids!

★ ★ ★ ☆ ☆ Sep 14 at 6:10 PM

If there were a way to make kids worlds separate from adult worlds it would be better. Thrive is great but I'd like to enjoy some of the other worlds more often but they are full of kids, many with foul mouths.

 Mary  Helpful | 2

Too much

★ ★ ☆ ☆ ☆ Sep 11 at 12:28 AM



Bad music kid games I went into one game and some kid screamed out. Oh my God Grandma is here. I bought the oculus for myself and I like it but it's too much. I got a mute myself so they don't hear me.

 Lori Knox Jordan  Helpful | 3

It's fun but...

★ ★ ★ ☆ ☆ Sep 7 at 7:53 PM

I love the app and worlds but I wish they had 18+ worlds where you have to verify that you are an adult as the screaming kids just wreck everything... 🤔

 SetoKnight  Helpful | 1

Good game however.....



★ ★ ★ ☆ ☆ Sep 1 at 5:11 PM

The new monster attack game is cool with the swap teams button but All these stupid kids keep refusing to swap and let someone else get their turn I was only the monster once

 J  Helpful | 0

★ ★ ★ ★ ★ Aug 29 at 7:22 AM

My 6 year old autistic son loves this system. He has been communicating so much better with other small children. Its awesome.

 Big Bear  Helpful | 0



### Too many children

★ ★ ☆ ☆ ☆ Aug 27 at 4:08 PM

Title says it all



rbbtzz



Helpful | 3

### Honestly? Not bad.

★ ★ ★ ★ ☆ Aug 23 at 9:17 AM

I think that Horizons has a lot going for it, but it's not perfect. A lot of the fun comes from the user-made worlds and the ability to interact with people all over the world. My biggest gripe with Horizons is that you end up in worlds full of children, and there's little to no way of filtering out people who aren't in my age group. I'd much rather be able to meet people close to my age than have to deal with a bunch of rowdy kids.



Toonukii



Helpful | 1

### Great app, terrible players

★ ★ ★ ★ ☆ 28 Jul at 20:49

Almost all of the players in the games are 5-11 year olds, the maps and games are great but the experience gets ruined when a small child is screaming at me.



Blainethebozo



Helpful | 3

### Cool, still lots to explore

★ ★ ★ ★ ☆ Aug 22 at 5:47 PM

A little too many kids to be a true social app but have had some fun on my own. Building is surprisingly cool and easy in VR



deadandroidusers



Helpful | 0

### Great idea

★ ★ ★ ☆ ☆ 25 Jul at 11:08

Great idea, but I honestly can't enjoy it because of all the unattended children in the app experience.



Simp Imp



Helpful | 1

Feels like a little kids game.

★ ★ ☆ ☆ ☆ 21 Jul at 20:34

To many little kids running around being toxic.

Great for concerts and live entertainmen

★ ★ ★ ★ ★ 19 Jul at 20:13

Excellent for comedy and concerts but too many kids lol



Sarah Wilkens  Helpful | 0

Pretty fun

★ ★ ★ ★ ☆ 18 Jul at 17:44

It works well if you have good WiFi. My grandfather (64) doesn't have good WiFi so when I go to his house for the summer it's slow and glitchy but when I'm with my mom (33) it works perfectly. ((I included age so it's obvious the difference in WiFi they have))



Me-Me  Helpful | 0

Horizons

★ ★ ★ ☆ ☆ 17 Jul at 15:03

Love the new scenery. Bad thing is so many glitches. I can't watch any venue, concert, comedy show. Just keeps freezing up. I've had my metaquest 2 for 5 months now and have never been able to watch anything . If I join with my mobile app, I get removed quick by moderators. I don't know why. I stay to myself and try to figure out how to move around on the mobile app. I get removed. A lot of bullying also and foul language from children. Especially in Vr chat.

[See less](#)

COPY

...

★ ★ ☆ ☆ ☆ 15 Jul at 14:53

Rec room rip of tons of tiny children laggy



Tanner



Helpful | 0

All Children

...

★ ☆ ☆ ☆ ☆ 14 Jul at 09:56

The world's are cool and everything but in three months I've spoken to only a handful of adults. I really wish there was an over 18 setting for the world's because all the children are why I don't visit these world's anymore. Both annoying and feel like a creeper. How hard can it be to age verify with ID or a credit card or something and set your preferences to "adult only" for interactions.

[See less](#)

I hate this world

...

★ ☆ ☆ ☆ ☆ 15 Jul at 09:20

Full of rude kids, even the 18+ worlds. People start stuff. When i respond I get reported and banned for a period of time. They don't, even though they started it. I hate getting on here now.

It's a game?

...

★ ★ ★ ★ ☆ 14 Jul at 18:30

Life is Roblox, but this is Roblox but better you are more in control, rather than a keyboard. 4 stars because life is Roblox



JEFF



Helpful | 0

Like it



★ ★ ★ ★ ★ 13 Jul at 16:09

Just wish there was not so many screaming little kids



Grant Michaelis  Helpful | 0

Annoying, full of kids, waste



★ ☆ ☆ ☆ ☆ 12 Jul at 18:01

Everything to do with horizon is annoying. The two times I tried worlds, every space was filled with children, annoying and petulant little kids - I swear to god one sounded like a toddler. How can anyone enjoy a chance at a game when it's nothing but immature, screaming kids who probably have some of the most irresponsible parents on the planet. Horizon worlds and the horizon feed are useless and I wish I could remove the feed and never have to see the app again. I'll never be using worlds again, unless they make a setting where you can AVOID people under a certain age. Meta needs to make this app better so people can be around those their own age, not kids. Parents also need to do a better job at BEING PARENTS.

[See less](#)

Nothing for us old people



★ ☆ ☆ ☆ ☆ 12 Jul at 15:16

Everything seems geared towards kids and young adults.



Hef  Helpful | 6

The daycare



★ ☆ ☆ ☆ ☆ 10 Jul at 06:09

Is horrible. From the controls to the graphics. Plus there are no instructions! I also don't like playing with a bunch of kids



J. Michelle Baker  Helpful | 6

### Not great



★ ☆ ☆ ☆ ☆ 6 Jul at 07:21

this is a place for kids. don't come here if you're a teen or older.



cub



Helpful | 5

### Annoying strangers jump in



★ ☆ ☆ ☆ ☆ 3 Jul at 13:38

Not very fun. Looking at a low poly painting is more fun and peaceful. First impression was a kid singing about exercise. Annoying. Deleting.



### Work in progress



★ ★ ★ ☆ ☆ 2 Jul at 20:39

For a more advanced version of VR headsets, it's evident that the platform still has room for improvement. From my experience, horizon worlds are basically designed for children, and I haven't noticed anything that's more adults oriented. The videogames are pretty entertaining and dynamic but for most of them the price is too high, needless to say that you should definitely like them bc if you don't and use it for more than 2 hours, you're less likely to get a refund. For the LGBTQ community it could be a nice option to have a space where they could share experiences and socialize over the platform. Parenting control is needed!!! Kids are always on around 3 am!!! Overall, I'd give it a 7/10.

[See less](#)

It's got its goods and bads...



★ ★ ★ ★ ☆ 1 Jul at 09:25

It's what you make of it and we choose to make it a nice escape from the real world drama. There are many fun and interesting things to do in there as long as you don't end up someplace overpopulated by kids. I tend to go in private mode for that reason unless I'm visiting with friends and we're in adult type venues where bored kids choose not to go. Othe

[See more](#)



Deb S



Helpful | 0

Horizon Worlds: A rude kids nursery room



★ ★ ★ ☆ ☆ 6 Jul at 00:28

There are too many unsupervised kids in these rooms, rude and foul mouth. Not enough mature adult oriented rooms here, or the adults are not interested in joining such. Too sad, it could've been a really cool hangout. I stay away from Meta Horizon Worlds now on.

Feels like a little kids game.



★ ★ ☆ ☆ ☆ 21 Jul at 20:34

To many little kids running around being toxic.



Salty.Sculpts



Helpful | 4

### III. Reviews Mentioning Children and Bullying or Harassment

person called me the N-word

★ ☆ ☆ ☆ ☆ 15 days ago

I was playing the game when this kid ran up to me. His name was I love cookies and he just started screaming the N-word

Fun but could be improved

★ ★ ★ ☆ ☆ A day ago

Horizon worlds is enjoyable and there are always new games and experiences to try every day. It's a good way to meet people across the world. There are some users young and old who use profanity and slurs that can hurt the experience. Then there are others who bully using the poll feature via multiple profiles to boot people out games for no legit reason. And lastly there are users who take advantage of the game by hacking profiles and taking their points on the leaderboards. So that's the reason for 3 stars because when these users are reported to meta nothing happens which hurts the experience and games integrity. I wish that when you block a user that they can't see or interact with you completely (basically invisible to one another).

Banned for what?

★ ☆ ☆ ☆ ☆ 5 days ago

I haven't played my Quest 2 in over a year, I get a quest 3 and I'm banned from too many violations? I guess not joining Meta Worlds to hear racial slurs and kids screaming will get you banned.

What This Game Is About:

★ ☆ ☆ ☆ ☆ 2 days ago

There are lots of little kids that you find that are screaming in lobbies especially Spin The Bottle, there can be cyberbullies and toxic behaviours from all ages so this is not a great app for young players. Take care when playing!



...



Helpful | 1


Wish it was more like vrchat

...

★ ★ ☆ ☆ ☆ 14 days ago

Avatars suck . Only thing you offer is custom shirts. Avatars have no function at all except emojis .If block someone they still see you .They doesn't help when people are bullying you. I have a group of people bullying me .They look for my gray avatar and get others to bully me. I really wish it was better.



MoonLight Rose  Helpful | 1

Good and bad

...

★ ★ ☆ ☆ ☆ 23 days ago

The app is reasonable with a mixed quality of worlds but OMG...the annoying American kids! Every world of full of 10 year old American brats telling everyone they're going to rope (that 'o' is really an 'a') your mother! What is wrong with American kids?! This would be quite good if all these toxic players were banned but it's so annoying.



Rob H  Helpful | 4

Respect for all

...

★ ★ ★ ☆ ☆ 24 days ago

I agree with you. I don't like the fact that little kids are playing with adults either. Especially with the language and the way they are treating each other. I am teaching my grandson that there is no difference in skin color.. and I have seen and heard a lot of racist things in many ways on different games... I don't agree with at all



Adynnthegreat  Helpful | 3

Bullying

...

★ ★ ★ ★ ★ Sep 26 at 3:15 PM

Cussing and roasting but my favorite game



Dakota B  Helpful | 1



### The amount of little kids is awful



★ ☆ ☆ ☆ ☆ Sep 10 at 9:55 AM

Y'all need to control your app better, way too many little kids, and horrible kids too thinking they can bully, swear, and talk awful to people online! Its honestly disgusting! Its also the parents fault for allowing their kids even on this app when it clearly says \*Teens\* & up! Literally just hopped onto a horizon game and kids were immediately calling me all the swears you can think of, calling me ugly, fat, old etc., they can call me whatever they would like but i find it very disgusting that they are even allowed on this platform that clearly says for teens & up!!! Its also very hard to enjoy any of the games when their is just a bunch of kids acting up, bullying, swearing, etc. i didn't get a VR for this crap, i got it to escape and to be able to enjoy an amazing 3D reality! This is my personal opinion as well& what i always experience in horizon! I don't know what others experience, but i really think this should be looked into! I just want to be able to enjoy using horizon, but at this moment i don't think i want to use it anymore! Thank you!

[See less](#)



Lulu Helpful | 15

### Not impressed with being band



★ ☆ ☆ ☆ ☆ Sep 9 at 12:05 PM

What a joke you have little kids moderating and baning people because i didn't want to talk to him in the Horizon Centre is that what you call fair this is a joke and an outrage you seriously need to sort that out?????



Lee Archer Helpful | 6

### Unfair and biased standards



★ ★ ★ ☆ ☆ Sep 4 at 6:41 PM

True review?? Ok. Warning people for things said in an 18+ rated world while not doing anything to kids running around swearing, threatening and using language like the N word..closing down worlds claiming it goes against your "standards" when it's 18+ with nothing in it that technically breaks your "nude and pornographic" rules and NOT TELLING PEOPLE EXACTLY WHAT THE ISSUE IS. Meta is biased and caters to certain people and/or demographics.



Doug Helpful | 1

### Too Many Children Ruining The Fun



★ ★ ★ ☆ ☆ Sep 3 at 2:14 PM

I give this app 3.5 stars, with the willingness to increase this rating when my recommendations and concerns are met. Meta Horizon Worlds is a great place to interact with people from around the world. Regardless of your age or interests, there is something for everyone to enjoy. Creativity is a main building block of this universe; if a world or activity you're looking for doesn't exist, you can create it yourself. The biggest downfall of this app is the overwhelming number of unruly children who find joy in obscene behavior and insulting others. Although reporting is built in, I feel not enough is done to ensure the comfort of those who actually forked out the money for the headset. I have spoken to many adults who are fed up with the lack of oversight and effective consequences in these worlds. I truly hope Meta enacts a plan to combat this behavior and monitor age-restricted worlds more successfully. Another recommendation I have is to provide tutorials on creating a world. Guidance is needed for those of us with little to no experience in that area.

[See less](#)



RayTay



Helpful | 4

### Love it but...



★ ★ ★ ☆ Sep 1 at 7:31 AM

To much homophobia and people were kicking me out just bc i was gay 😞



いおづえごじよ



Helpful | 2

### Inappropriate behavior



★ ★ ☆ ☆ ☆ Aug 28 at 9:54 PM

Need to be more options to report inappropriate behavior. As a female, I hear kids calling women the B word I had to change the avatar to a male sex to not be called derogatory put down for women The kids come in these games and they're so rude disrespectful, they have no regard for others, enjoyable experience, playing a game There needs to be more controls on this hate speech they are doing it's a bad negative impact for meta and the gaming platforms



Virtuous



Helpful | 4

### Moderation Team



★ ★ ☆ ☆ ☆ Aug 26 at 6:03 AM

I just want to say first off this is a good app, you genuinely meet decent people etc but I've noticed it doesn't really have something that protects women. For example, when a woman wants to stand up for herself, she's in a risk of being banned. Children on the app seem to escape with anything they want to say. I think it's pathetic. I know a few people who have been banned. SORT IT OUT.



Marcus.



Helpful | 1

### Good, but LOTS of room for improvement



★ ★ ★ ☆ ☆ 21 Jul at 10:23

As much as I'd like to be able to leave 5 stars, the app is just way too flawed for me to do so. For one, it seems to experience many bugs and glitches that in some cases take forever for Meta to fix. Recently I've been constantly having issues with the floor height, where it keeps making my avatar crouch down when I'm actually standing up. The app crashes almost everyday, complaining that it's using too much memory (I'm on a Quest 3 btw). And I've noticed they got rid of the world chat feature for some odd reason, which I found extremely useful for not only me who's muted alot and doesn't like their voice, but also for hearing impaired people. I genuinely will never understand why they'd get rid of such a useful feature. But most important of all, the toxicity. Not to say this applies to everyone, but my goodness! So many people on here are rude and disrespectful for literally no reason, especially little kids. Speaking of little kids, it seems 80% of the userbase is comprised of immature kids under the age of 13 with no parental supervision. One day I was simply just watching a live concert in the Music Valley, and out of the blue this one kid calls me a b\*\*\*\* right to my face! 🤦. Obviously I reported him, but Meta sends me a notification saying that he didn't break the code of conduct. Like wtf that's bs. And I've had many other similar experiences in the past as well. Meta seriously needs to work on their moderation and ensure repercussions against disrespectful behavior. Because right now it seems like they don't care, and are basically encouraging people to be bullies. Don't get me wrong, I enjoy Meta Horizon Worlds, but it's got a long way to go to perfection. All I can say is, I truly hope Meta will step up their game and fix all the issues with this app.

[See less](#)

### Abuse central



★ ☆ ☆ ☆ ☆ 12 Aug at 19:18

Non-stop epitiths, hateful slurs, violent threats, harassment, bullying, & intimidation. Report someone? No matter what, comes back as 'not a violation'. Complain to support? They end the chat. Meta needs the numbers for engagement to show investors, so they won't kick anyone off the platform no matter what they say or do. No consequences makes it a free for all. Something tragic is bound to happen, if it hasn't already. In my last visit, I was called the n word a few dozen times, filed a report and they said it was not a violation. Chat just closes as resolved over and over. Literally no one cares - not the toxic kids doing the abuse, not the support team, and not meta. It was like this on launch and still as of last week.

[See less](#)



Danny Mac



Helpful | 14

## Super rumble



★ ★ ★ ☆ ☆ 16 Jul at 20:36

I try to report the people that are doing bad things like cussing ,hate speech and and death threats. Nothing can be done; they're not breaking the code of conduct but someone reports me for doing nothing and I get a warning because they think I'm bullying when it's the other way around cussing at me and it was a little kid doing it all on the parent's headset. How fair is that for me to get blamed for their wrong doing that's pretty messed on that situation. Isn't there an age limit that kids can start to be in super rumble? They get by with it because it the parents' account.

[See less](#)



Chrystal Boggs  Helpful | 1

## Excruciatingly nauseating



★ ☆ ☆ ☆ ☆ 11 Jul at 15:14

I've spent several hours a day (5-6) in vr the last couple days. Felt great. The second I open horizons to try it out, immediately I'm nauseous, my eyes hurt, and I feel like I'm about to pass out. Only when I play meta horizons. Nothing else has this much of an effect on me. Maybe a little in some flying sims, but that's to be expected. When I'm walking around a world and there's intentional tunnel vision implemented into the movement, kids are screaming calling me the n word while spinning in circles making this 10x worse. This is probably the worst app for the meta quest.

[See less](#)

So fun! But some issues with toxicity.



★★★★★ 12 Jul at 06:07

It's so fun, but there's some stuff that needs to be fixed. Like the toxicity, I wore all gold, and someone called me "broccoli n-word." So as much as I love it, people need to be nicer to the community in there. So please start being nicer. But overall, it's really fun. Just ignore the people being mean. If you are new, here's some stuff if you see a toxic person. 1. You can mute them. 2. You can report them. 3. You can poll to remove. These are the best suggestions. I hope this helped the new players to Meta Horizon and welcome to meta horizon worlds if you new!!! Bye!!!!!!

[See less](#)

Love it but



★★★★☆ 7 Jul at 13:22

I love the game and all but I have had to report multiple people many times for being inappropriate to much when the are like six year olds in the game mainly (spin the bottle) I know tons of people who get bullied by how there avatar looks like the rainbow costume people thought the person was gay or me for being emo



MEOWOHIO Helpful | 0

Fun Game but risky



★★★☆☆ 14 Jul at 22:51

This game is fun but full of toxic kids, if you get mass reported you put your actual meta account at risk, should limit penalties to the game, people shouldn't have to risk losing hundreds of dollars in games because some toddlers get angry, the investigation process is biased too



Laura Chontow Helpful | 2

Ugh...



★☆☆☆☆ 5 days ago

An embarrasment of children shouting racial slurs and empty, circa-2005 looking worlds that instill a sense of overall sadness. What a waste of billions!

## IV. Reviews Mentioning Children and the Risk of Sexual Predation

Some absolute disgusting people

★ ☆ ☆ ☆ ☆ A day ago

I'd be careful on here, weird kids talking about d@@ks and asking other children if they know what d@£k is. Some parents need to be checking hard drives

Age

★ ☆ ☆ ☆ ☆ 22 days ago

I think U need to change age access to 16 plus there is to many pedos on here and way to many minors 12-13 isn't grown up



Jazzy Helpful | 4

Parents BE WARNED!!!

★ ★ ☆ ☆ ☆ A day ago

Ok, I have been playing Horizon Worlds for a long time it was great fun. Now, unfortunately, it seems to be consistent flooded with underage kids and unlawful behavior. Many of the world's are created for pure adults and not suitable for children. Some of the world places don't bother to put a password or administrative person in place to block underage users from entering adults only zones. I've consistently had to report individuals for violations, but most of the 6 reports do nothing. Offensive players consistently don't get banned even when the rule breaking is blatantly done. I think both META AND Horizon worlds admits needs to take a stronger role monitoring and enforcement of the rules...

[See less](#)



Dragonias Helpful | 0

Report Button is corrupt

★ ☆ ☆ ☆ ☆ 24 days ago

They won't even let me report all the issues about their game. DO NOT BUY!!!! Pedos are everywhere and little kids screaming the N-Word constantly, along with horrible lag. Do. Not. Get.



Matthias Helpful | 6

### Full of child predators

★ ☆ ☆ ☆ ☆ Sep 17 at 8:02 PM

Child predators and the guides are grooming kids STAY AWAY



Sam Yeuong Pak Helpful | 6

### To much petos

★ ★ ☆ ☆ ☆ Sep 14 at 6:19 PM

I was playing is game sum 30 year old dude came up to me and asked if I have a BF



madpie Helpful | 1

### Watch your child's Activities

★ ★ ☆ ☆ ☆ Sep 16 at 6:37 AM

I'm in all areas of the app. There is very explicit material on this app, even in the child appropriate areas..to my dismay. Children are also in the +18 area, as well as a parent. You need to cast to computer and monitor what and who your child is interacting with and friends with, making sure they are age appropriate lastly. Make sure you turn off what meta room your child is into only show active!



Beignet.504 Helpful | 3

### Stranger Danger

★ ★ ★ ★ ☆ Sep 14 at 6:55 AM

The game is good. However,.....Can you add a feature where I can turn off virtual strangers approaching me. It's very disconcerting especially when you intentionally avoid them, but you can still watch them searching for me. I don't want to feel stalked while exploring.



Kellz Helpful | 0

Creepy players



★ ★ ☆ ☆ ☆ Sep 14 at 6:51 AM

Great game but players would follow me around and stand in front of me whenever I would try to do activities.



TyJhae Helpful | 1

:(I love the game but weird stuff happes.



★ ★ ★ ★ ★ Sep 2 at 5:02 PM

I love the game, but weird stuff always happens like when I say fake a f k, a random 18 year old comes up and does something weird and says really weird stuff, and it really makes me uncomfortable, so can you please send like, say some rules in the intro or something or like I don't know like put a system where it warns you if you say really bad stuff 😞



VenzoBeanie Helpful | 1

Fun but..,



★ ★ ★ ★ ★ Aug 31 at 11:46 AM

Sometimes it's good sometimes bad bc people can bully u and if they do I ignore it AS A 9 YR OLD I don't want people saying cringy stuff and impropriety stuff but they do and bad words so yeah it's fun until thos things happen stay safe too people can scam u ur address be careful when playing u can rage too don't leave ur vr in the sun either and don't play out side



Emma Helpful | 2

It's ok



★ ★ ★ ★ ☆ 7 Jul at 10:46

The game is fun with tons of games to play, but I would watch out for adults they can be doing inappropriate stuff so watch out to all the little kids.



BadKarma Helpful | 2



## Kicked out of Gatsby's bar and black cat



★ ☆ ☆ ☆ ☆ 21 Jul at 00:35

Kicked out of both within 2 mins for just walking around and not talking to anyone as I'm very shy,



Eloise Bodd Helpful | 4

## RACIST PEOPLE AND PEDOPHILES



★ ☆ ☆ ☆ ☆ Aug 21 at 7:16 PM

YOU GUYS NEED TO HAVE A PLACE FOR ADULTS AND A PLACE FOR KIDS. THERE'S PEDO's( PEDOPHILES) TALKING TO KIDS INAPPROPRIATELY. YOU GUYS DO NOTHING. THERE'S RACIST PEOPLE CREATING RACIST WORLDS. YOU GUYS DO NOTHING. IN 2024 THERE'S NO REASON FOR MY FRIENDS AND I TO COME ON THE OCULUS AND GET CALLED ALL SORT OF NAMES AND RACIST SLURS. THERE SHOULD BE SOMETHING IN YOUR SYSTEM THAT WHEN SOMEONE SAYS A CERTAIN WORD SUCH AS "N\*\*\*a or F\*\*\*ot" OR ETC. THAT GETS AUTOMATICALLY REPORTED BY YOUR SYSTEM. THERE'S MULTIPLE FACEBOOK GROUPS COMPLAINING ABOUT THE SAME THING. I HAVE FRIENDS WHO PERSONALLY DOESN'T GET ON THE OCULUS ANYMORE BECAUSE OF THE NASTY DISGUSTING THINGS PEOPLE SAY. IT FEELS LIKE THE OCULUS ISN'T MADE FOR ADULTS AND DEFINITELY NOT MADE FOR PEOPLE OF COLOR. THE RACISM IS DISGUSTING. ALSO YOU GUYS LET ADULTS HAVE SEXUAL CONVERSATIONS WITH KIDS. I DON'T COME ON THE OCULUS TO HEAR ADULT MEN AND WOMEN TALKING ABOUT SEX OR WITH KIDS WHO ARE 6-12. I DO MY DILIGENCE AND REPORT THEIR ACCOUNTS TO YOU GUYS. THE WORST PART ABOUT IT IS WHEN I REPORT THESE SITUATIONS TO YOU GUYS, YOU GUYS SEND ME A REPORT BACK SAYING YOU'VE FOUND NOTHING WRONG. THAT LET'S ME KNOW YOU GUYS DON'T CARE. YOU GUYS GENUINELY DON'T CARE. WE ALL COMPLAIN AND REPORT ABOUT THE SAME THING AND NOTHING WAS DONE ABOUT IT. I DO NOT RECOMMEND ANYMORE. I HAVE FAMILY AND FRIENDS ALL AROUND THE WORLD THAT I WOULD LOVE TO CONNECT WITH VIA OCULUS VR, HOWEVER I CAN'T. IT'S EMBARRASSING, THE DISGUSTING BEHAVIOR ARE UNACCEPTABLE. I CAN'T RECOMMEND A GAME THAT'S FILLED WITH RACISM AND PEDOPHILES TO ANYONE. IF YOU GUYS CARED WE WOULD Have SEEN WAY MORE CHANGES BUT WE DON'T. WITH ALL THAT BEING SAID I HOPE YOU GUYS CHANGE THESE PROBLEMS.

[See less](#)

## A good game but has downsides



★ ★ ★ ★ ★ Aug 28 at 10:12 AM

This game is generally good from the eyes of a kid like me but some adults like in their 20s try to do weird stuff to afk 10YEAR old kids and say horrible stuff but in the time you play you make friends on the journey that are really kind and fun to play with but the only think I ask is for the community to start putting some extra efforts in



Tommy Goodman Helpful | 32



## Appendix F

The following is a list of publicly available videos containing audio of voices from children under the age of 13. Fairplay researchers used these recordings as reference audio when determining whether the voice of a user in Horizon Worlds likely belonged to a child under the age of 13.

- <https://www.youtube.com/watch?v=JJvM6cewuog>
  - Gaming video with children roughly aged 7-9
  - Example of the type of enunciation and exclamation from kids playing games
- <https://www.youtube.com/watch?v=GU8kSwhlmkE>
  - Gaming video with 7- and 8-year-old boys
- <https://www.youtube.com/watch?v=fgLxHNhpy24>
  - Excellent video demonstrating the difference between a child-like adult voice and the voices of children from 5th grade
- <https://www.youtube.com/watch?v=afc783au8d8>
  - Video with voices of children from 5th grade, discussing the vocabulary differences between adults and children
- <https://www.youtube.com/watch?v=TGzcmk0AnJQ>;  
<https://www.youtube.com/watch?v=66j9QUhLayY>
  - Examples of the upper-end of ages flagged by Fairplay researchers. These children are entering 6th grade, with ages of approximately 11-12 years old
- <https://www.youtube.com/watch?v=iQ9o4oYRhLc>
  - Good example of the lower range of what you will find in Horizon Worlds. These children are in 3rd grade, or approximately 8 years old