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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

**THE PEOPLE OF THE STATE OF
CALIFORNIA,**

Plaintiff,

JAM CITY, INC.

Defendant.

Case No.

25STCV34029

**COMPLAINT FOR INJUNCTION, CIVIL
PENALTIES, AND OTHER EQUITABLE
RELIEF**

(Civ. Code, § 1798.100 et seq.;
Bus & Prof. Code, § 17200 et seq.)

1 The People of the State of California, through Attorney General Rob Bonta, bring this
2 action against Defendant Jam City, Inc. ("Jam City") for violations of California's consumer
3 protection laws. The People allege the following facts based on information and belief:

4 INTRODUCTION

5 1. Californians enjoy a constitutional right to privacy that underpins consumers' right to
6 tell businesses not to sell or share their personal information. How a business operationalizes that
7 right is a crucial part of California's comprehensive data privacy law, the California Consumer
8 Privacy Act ("CCPA"). This hallmark of the state privacy law requires businesses to provide an
9 effective means to opt out of that sale or sharing of data. And, to make that right as easy as
10 possible for consumers to express, the opt-out mechanism must primarily reflect how the business
11 interacts with the consumer. In the context of a mobile app, this means that app developers must
12 design and provide opt-out methods within the apps they offer to consumers.

13 2. Jam City, a mobile gaming company based in California, creates free-to-play apps
14 that generate revenue by displaying ads that are personally targeted to consumers. Despite
15 exclusively creating games for mobile devices, Jam City did not provide in-app opt-out methods
16 in its games—effectively denying consumers the right to opt-out of the sale and sharing of their
17 personal information.

18 PARTIES

19 3. Plaintiff the People of the State of California bring this action by and through Rob
20 Bonta, Attorney General of the State of California. The Attorney General is authorized to bring
21 this action under Civil Code § 1798.199.90 and Business and Professions Code §§ 17204 and
22 17206.

23 4. Defendant Jam City, Inc. is Delaware corporation headquartered in Culver City,
24 California.

25 JURISDICTION AND VENUE

26 5. Jam City has conducted and continues to conduct business within the State of
27 California, including the County of Los Angeles, at all times relevant to this complaint. The
28

1 violations of law described herein were committed or occurred in the County of Los Angeles and
2 elsewhere in the State of California.

3 **FACTUAL ALLEGATIONS**

4 6. Jam City is a developer that exclusively creates gaming apps for mobile devices. Jam
5 City's games are based on original and licensed intellectual properties, including highly popular
6 franchises from Disney and Warner Bros. Jam City's games are free-to-play and generate
7 revenue, in part, through in-app advertising.

8 7. Jam City collects personal information such as device identifiers, IP addresses, and a
9 user's interaction with a game, including whether the user purchases in-game goods and how
10 often a user plays the game. This information is used to personally target ads to Jam City's users,
11 including California consumers.

12 8. Jam City discloses this consumer personal information to third-party companies for
13 advertising and analytics. These companies in turn use the personal information, as well as data
14 collected across different websites, apps, and music, podcast, and TV streaming services for
15 cross-context behavioral advertising. Because of Jam City's data sales and sharing, advertisers
16 and third-party companies are able to personally target ads to Jam City's users both within Jam
17 City's apps and on other apps or platforms.

18 9. The CCPA regulates businesses' sale and sharing of personal information, which
19 includes cross-context behavioral advertising, and provides consumers with the right to opt out of
20 such sale and sharing. To effectuate this right, the CCPA requires businesses to provide a link
21 within its websites and apps that takes the consumer to an opt-out mechanism. Businesses are
22 required to ensure that the opt-out mechanism reflects how the business interacts with the
23 consumer. Therefore, a business that primarily creates apps for consumers is required to provide
24 opt-out links within its apps.

25 10. In May 2024, the Attorney General initiated an investigation and found that Jam City
26 did not provide a CCPA compliant opt-out link or setting within any of its apps. Of Jam City's
27 21 apps, 20 lacked any control or setting addressing the sale/sharing of consumers' personal
28 information. The remaining app provided a control titled "Data Privacy" that did not reference

1 the CCPA and was unclear about whether enabling the control would stop the sale or sharing of
2 consumers' personal information.

3 11. Jam City also did not provide an opt-out link on its website, nor did it provide a
4 CCPA compliant opt-out method. Instead, the only reference to consumers' CCPA opt-out rights
5 was in Jam City's privacy policy under a section titled "Cookies and Interest Based Advertising"
6 where Jam City told consumers that they could email Jam City at ccpaoptout@jamcity.com to
7 stop targeted advertisements—a method that by itself did not meet CCPA requirements.

8 12. The CCPA also provides increased protections for minors' data, including prohibiting
9 businesses' sale and sharing of personal information of consumers the business knows to be less
10 than 16 years of age, without first obtaining opt-in consent from the consumer or their parent.

11 13. For several of its apps, Jam City employed an age gate and required users to submit
12 their age when first installing the games. For most of these age-gated games, Jam City provides
13 "child-versions" of the game that do not collect or share personal information with third parties
14 for users who submit an age below 16. However, Jam City failed to properly maintain the age
15 gate for six of its games and only provided the child versions to consumers who declared their age
16 to be below 13. This meant that for those six games, consumers between 13 and 16 years of age
17 had their data sold or shared without Jam City first obtaining those minors' affirmative
18 authorization.

19 **FIRST CAUSE OF ACTION**

20 **FOR VIOLATIONS OF THE CALIFORNIA CONSUMER PRIVACY ACT, 21 CIVIL CODE SECTION 1798.100 ET SEQ.**

22 14. The People reallege and incorporate by reference each of the paragraphs above as
23 though fully set forth herein.

24 15. Jam City has engaged in acts or practices that violated the CCPA and its
25 implementing regulations within the meaning of Civil Code section 1798.199.90. These acts or
26 practices include, but are not limited to, the following:

- 27 a. Selling and sharing a consumer's personal information to third parties without
28 providing a CCPA compliant opt-out process. (Id. §§ 1798.120 subds. (a) (b),

1798.135 subds. (a), (c)(2), 1798.140 subd. (p); Cal. Code Regs. § 7026 subd. (a).)

- b. Selling and sharing the personal information of consumers known to be between the 13 and 16 years of age without obtaining the consumers' affirmative consent. (Id. §§ 1798.120 subds. (c) (d), 1798.135 subds. (a), (c)(5), Cal. Code Regs. § 7071 subd. (a).)

SECOND CAUSE OF ACTION

FOR VIOLATIONS OF THE UNFAIR COMPETITION LAW, BUSINESS AND PROFESSIONS CODE SECTION 17200 ET SEQ.

16. The People reallege and incorporate by reference each of the paragraphs above as though fully set forth herein.

17. Jam City has engaged in unlawful, unfair, or fraudulent acts or practices, which constitute unfair competition within the meaning of Section 17200 of the Business and Professions Code. These acts may include but are not limited to violations of the following:

- a. Civil Code section 1798.120, subdivisions (a), (b), and (c);
- b. Civil Code section 1798.135, subdivision (a)(1) and (a)(3); and
- c. California Code of Regulations, title 11, sections 7013, 7015, and 7026.

PRAYER FOR RELIEF

WHEREFORE, the People pray for judgment as follows:

1. Pursuant to Civil Code section 1798.199.90, that the Court enter an injunction to prevent Jam City, as well as their successors, agents, representatives, employees, and all persons who act in concert with them from engaging in any act or practice that violates CCPA, including, but not limited to, as alleged in this Complaint;

2. Pursuant to Civil Code section 1798.199.90, that the Court assess civil penalties of two thousand six hundred sixty three dollars (\$2,663) for each violation of CCPA, or seven thousand nine hundred eighty eight dollars (\$7,988) for each intentional violation and each violation involving the personal information of minor consumers, as proven at trial;

1 3. Pursuant to Business and Professions Code section 17203, that the Court enter an
2 injunction and make such orders or judgments as may be necessary to prevent Jam City, as well
3 as their successors, agents, representatives, employees, and all persons who act in concert with
4 them from engaging in any act or practice which constitutes unfair competition;

5 4. Pursuant to Business and Professions Code section 17203, that the Court make such
6 orders or judgments as may be necessary to restore any person in interest any money or property
7 which may have been acquired by means of unfair competition in an amount according to proof;

8 5. Pursuant to Business and Professions Code section 17206, that the Court assess civil
9 penalties of two thousand five hundred dollars (\$2,500) against each defendant for each violation
10 of Business and Professions Code section 17200, as proven at trial;

11 6. Under the authority of Government Code section 12527.6, that the Court award the
12 remedy of disgorgement in an amount according to proof;

13 7. That the People recover their costs of suit; and

14 8. For such other and further relief as the Court deems just and proper.

15 Dated: November 21, 2025

Respectfully submitted,

16 ROB BONTA
17 Attorney General of California

18 
19 MANEESH SHARMA
20 Deputy Attorney General
21 *Attorneys for The People of the State of*
22 *California*