

**MISSOURI ATTORNEY GENERAL'S OFFICE**  
**REQUEST FOR PROPOSALS (RFP) FOR**  
**OUTSIDE COUNSEL FOR INVESTIGATION AND LITIGATION**  
**AGAINST ROBLOX UNDER MISSOURI LAW**

Date Issued: April 6, 2026

RFP No.: 2026.2

Proposals Due: May 4, 2026.

Point of Contact: RFPSubmission@AGO.MO.GOV

Missouri Attorney General's Office (AGO)

**I. INTRODUCTION**

Pursuant to Mo. Rev. Stat § 34.378, the Missouri Attorney General's Office ("AGO") seeks proposals from qualified law firms or attorneys ("Respondents") to provide legal representation in investigating and, if warranted, litigating potential claims on behalf of the State of Missouri pursuant to Mo. Rev. Stat. § 34.378.1. Specifically, the AGO seeks outside counsel on a contingency fee basis to represent the State of Missouri in connection with the investigation of and possible litigation regarding interactive video gaming platform Roblox.

**II. BACKGROUND AND POTENTIAL CLAIMS**

The AGO is considering civil enforcement and related claims against Roblox Corporation and affiliated entities concerning the design, marketing, and operation of the Roblox platform as they impact Missouri residents and consumers, including minors, under Missouri law. The AGO is considering all legal authorities for such action including but not limited to the Missouri Merchandising Practices Act (RSMo § 407.020), Missouri privacy protections, and any other Missouri statutes implicated by Roblox's activities. The AGO intends a full investigation into the impacts on Missourians of allegations reports of deceptive marketing to children and their parents regarding online safety of children in a gaming environment, or any other unlawful actions Roblox may have conducted in the state of Missouri in violation of Missouri law, including Mo. Rev. Stat. § 407.020. Lawsuits in other states have identified unlawful practices by Roblox, many of which, if conducted in Missouri, would violate Missouri's laws. A number of Missouri parents have also sued the corporation, claiming the platform enabled predators to target or exploit their minor children.

Without limitation, the AGO anticipates that Respondents may investigate and, if warranted, plead federal or state-law claims based on unfair or deceptive acts and practices, omissions, failure to warn, negligence-based theories, unjust enrichment, and other legal claims, as appropriate, to protect Missourians and deter misconduct.

### **III. SCOPE OF SERVICES**

The scope of services will include, but not be limited to the following, all under AGO direction:

- Conducting analysis of data and advising the AGO on the viability of legal claims;
- Drafting pleadings, motions, and other legal documents;
- Managing discovery, including document review and depositions;
- Engaging expert witnesses and litigation support as needed;
- Representing the State in all proceedings including trial and appeals;
- Participating in settlement negotiations, under the direction of and subject to AGO approval;
- Assisting with enforcement of judgments or settlements;
- Submitting regular reports to the AGO on case progress, strategy, and costs;
- Meeting all other requirements of retained private attorneys as provided in Mo. Rev. Stat. § 34.378.

Consistent with AGO priorities, Respondents should be prepared to conduct far-reaching factual investigations regarding platform safety features, moderation, default settings, parental controls, age/identity verification, data practices, in-platform currency and monetization (Robux), third-party developer “experiences,” and alleged risks to minors, including grooming, sextortion, and off-platform migration. Respondents should also be prepared to coordinate with digital forensics and other technical experts.

### **V. COMPENSATION; STATUTORY LIMITS; TRANSPARENCY**

The AGO anticipates a contingency fee structure, but reserves the right to negotiate hourly rates or hybrid arrangements. In accordance with Mo. Rev. Stat § 34.378.7, contingency fee contracts shall be reasonable and subject to a sliding scale as follows:

- 15% of the first \$10 million recovered
- 10% of the next \$5 million recovered
- 5% of the next \$5 million recovered
- 2% of any recovery exceeding \$20 million

In no event shall the aggregate contingency fee exceed \$10 million, exclusive of reasonable costs and expenses.

Under Mo. Rev. Stat § 34.378, the final approval of any contingency fee arrangement or settlement exceeding \$100,000 must be provided by the AGO in writing. Any final contract must be published on the AGO's website for transparency Pursuant to Mo. Rev. Stat. 34.378.1

Respondents must propose a fee arrangement compliant with Mo. Rev. Stat § 34.378.

## **VI. QUALIFICATIONS AND MINIMUM REQUIREMENTS**

Firms and lawyers considered for selection to provide the services described herein must have:

- Demonstrated experience in complex civil litigation;
- Capability to review large data sets and assess legal exposure;
- Adequate staffing and financial resources to sustain protracted litigation;
- Willingness to operate under AGO direction;
- Compliance with all provisions of Mo. Rev. Stat § 34.378;
- No actual or potential conflicts of interest;
- No pending ethics violations or malpractice claims (or satisfactory explanation thereof).

Experience with technology, online platforms, product safety for minors, consumer protection enforcement, privacy, data security, child-safety design, large-scale eDiscovery, technical experts, and complex multi-jurisdiction coordination is strongly preferred.

Experience working with other state Attorneys General or government agencies on comparable litigation will be a significant distinguishing factor.

## **VII. PROPOSAL CONTENT**

Each proposal must include:

- Firm Overview: Description of the firm, principal attorneys, support staff, attorney biographies and bar admissions, including pro hac vice eligibility
- Relevant Experience: Examples of prior government representation and comparable litigation, including case outcomes, references, and budget performance
- Legal and Ethical Standing: Disclosure of malpractice claims, ethics complaints, or sanctions in past five (5) years along with a statement affirming good standing of attorneys
- Proposed Fee Structure: Contingency fee proposal in compliance with Mo. Rev. Stat § 34.378
- Conflict Disclosure: Statement regarding any real or potential conflicts of interest
- References: Minimum of three (3) references from prior or current government clients
- Litigation Specifics: a litigation plan; investigative approach; expert strategy; data and privacy expertise; staffing plan and Missouri lead counsel; proposed reporting cadence; and anticipated timeline.

## **VIII. INVESTIGATIVE CONSIDERATIONS**

A selected firm should plan to collaborate with the AGO to connect with impacted Missouri families/plaintiffs who may be interested in participating in litigation. Interested respondents should be prepared to initiate immediate collection of evidence in concert with witnesses, experts, and be ready to discuss preservation strategies, outreach to impacted Missouri families, and protocols to mitigate evidence spoliation risks.

## **IX. SUBMISSION INSTRUCTIONS**

Proposals must be submitted electronically in PDF format to [RFPSubmission@AGO.MO.GOV](mailto:RFPSubmission@AGO.MO.GOV) no later than 11:59 PM on Monday, May 4, 2026. Subject line must read: “Roblox Litigation RFP Response – [Firm Name]”. Late or incomplete submissions will not be considered.

Questions must be submitted by no later than 11:59 PM April 17, 2026 to [RFPSubmission@AGO.MO.GOV](mailto:RFPSubmission@AGO.MO.GOV). The AGO reserves the right to answer any questions either publicly (i.e. posted to website) or privately to an individual firm seeking information.

## **X. ANTICIPATED TIMELINE**

RFP Issued—April 6, 2026

Deadline for Written Questions – April 17, 2026

Proposal Submission Deadline – May 4, 2026

Interviews (if needed) – May 8, 2026

Award Notification – week of May 11, 2026

## **XI. EVALUATION AND SELECTION**

The AGO will evaluate proposals based on:

- Demonstrated experience in comparable complex civil litigation under state and federal law, including child-safety, privacy, and technology matters;
- Quality and feasibility of investigative and litigation plan;
- Staffing depth, resources, and ability to meet aggressive timelines;
- Value to the state and its people
- Compliance of proposed fee terms with Mo. Rev. Stat § 34.378;
- Ethical standing, conflicts posture, and references;
- Willingness to operate under AGO direction and to ensure compliance with regulatory transparency and statutory requirements.

Respondents must have experience in complex civil litigation and must be able to operate under the direction of the AGO.

## **XII. RESERVATION OF RIGHTS**

The AGO reserves the right to:

- Accept or reject any and all proposals;
- Waive irregularities in any proposal;
- Cancel or modify this RFP at any time; or
- Negotiate with one or more Respondents before final selection.

## **XIII. GOVERNANCE; AGO CONTROL; REPORTING**

The AGO retains ultimate control over all material aspects of the matter, including strategy, filings, settlement positions, and public communications. Regular written reports are required, with immediate notification of significant developments. Submit regular reports to the

AGO on case progress, strategy, and costs. Firms must meet all other requirements of retained private attorneys as provided in Mo. Rev. Stat § 34.378.

#### **XIV. KEY ENGAGEMENT TERMS AND COMPLIANCE**

Governing Law; Venue: This RFP and any engagement are governed by Missouri law; venue for any dispute shall lie in the Circuit Court of Cole County, Missouri. Contract terms will include standard provisions on term, termination at will by AGO, confidentiality, records retention, billing/cost controls, insurance, subcontracting approval, and conflicts.

Transparency and Records: Publication and record-keeping obligations under Mo. Rev. Stat §34.378 apply.

Conflicts/Ethics: Respondents must disclose all actual or potential conflicts and certify compliance with Missouri ethics, lobbying, gift, and procurement laws.

Respondents must comply with all provisions of Mo. Rev. Stat § 34.378, have no actual or potential conflicts of interest, and have no pending ethics violations or malpractice claims (or satisfactory explanation thereof).

#### **XV. PROPOSAL CERTIFICATION**

By submitting, Respondent certifies: (a) accuracy and completeness; (b) agreement to comply with Missouri law; (c) absence of disqualifying conflicts; (d) willingness to adhere to AGO direction and reporting, including all terms of this RFP; and (e) ability to commence work immediately upon award.