

From: dan.heisel@watech.wa.gov
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Wednesday, September 19, 2018 8:26:30 PM

Submitted on Wednesday, September 19, 2018 - 8:26pm

Submitted by anonymous user: 66.87.139.108

Submitted values are:

Select a Topic: Big Fish Games, Inc. Petition for Declaratory Order

Name: Lynn Franklin

Organization: Self

Comments: I strongly disagree with the courts interpretation that virtual chips are a "thing of value" . At no time is there an expectation of any return value. Personally, I have 40 million in PokerStars virtual chips. I've never paid for a single virtual chip and I have no expectation of gaining any value from these chips. Should I lose all 40 million, PokerStars would re-establish a small starter amount in my account free of charge. The only reason anyone would spend (lose?) money on these sites is if they were too impatient to wait for the site to re-establish their account. This is not an expectation of value, and is a totally unnecessary expense taken voluntarily by the individual paying for the chips. It is profoundly unfair to punish all virtual chip players because of one person's impatience.

The results of this submission may be viewed at:

<https://www.wsgc.wa.gov/node/19/submission/450>