

**From:** Debbie Taylor [ ]  
**Sent:** Thursday, July 12, 2018 11:38 AM  
**To:** Songer, Heather (GMB) <[heather.songer@wsgc.wa.gov](mailto:heather.songer@wsgc.wa.gov)>  
**Subject:** ARISTOCRAT - Big Fish Casino/Jackpot Magic Slots Online Gaming

Good morning Ms. Songer:

I recently filed a False Advertising Complaint against the subject entity who does business in your state. I am attaching a copy of my Original Complaint. With that Complaint I included a copy of a recent Federal Ruling as I alluded to it in my comments. I am also attaching a copy of that. Also attached are the Complaint Acknowledgement letter from the Washington Attorney General's office, and confirmation that the Complaint was being processed indicating that the Attorney General's office was also forwarding a copy to the Washington State Gambling Commission for your review. Then, I am attaching a copy of the Complaint response from BigFish that the Attorney General's office sent to me.

I know this is alot to "wade" through but I would like to take issue with Big Fish response and elaborate on my playing experience with this game, in the hopes that you will keep these issues in mind should Big Fish appeal the recent Federal ruling.

First, Big Fish \*falsely\* claims that all Jackpots are always attainable to \*all\* players at \*all\* times. One need only to play the games to see that this is absolutely false. There was one day recently where I played and I literally "spun" the slots almost one million times without ever hitting a Jackpot. And I had that same experience numerous times while playing. It was nothing to spin hundreds & hundreds of times without winning. So, in my opinion they are not being truthful in their response. And it's curious to me that there apparently is no real oversight of how they operate their games. Big Fish claims their odds are comparable to real casinos (see attached Odds document from their website,) yet they refuse to discuss the odds and/or publish the odds for consumers. I know that with real casinos, by law, in almost every state, they are required to publish their odds. Why is online gaming not subject to this?

Second, Big Fish seemed to be more interested in addressing the Federal Ruling instead of my False Advertising Complaint. In Big Fish response they state the following: ***"The Ninth Circuit explicitly held that it could not consider the argument that players in fact receive free virtual tokens in such numbers and at such regular intervals that it is not necessary to purchase more tokens to continue game play. Nor did the Ninth Circuit consider that the vast majority of consumers who play Big Fish Casino games never purchase any virtual tokens."***

Their response is positively comical. Yes, players receive free virtual tokens each day but players do not win anything with these free tokens. Players constantly lose and it's easy to lose them all within about 10 minutes. The slots are so "tight" it's impossible to win. And Big Fish then spams players about buying more coins to continue playing. I am attaching screen captures of just a sample of the spam ads urging players to buy more coins to keep playing. Furthermore, Big Fish claims that the majority of players never purchase virtual tokens. I don't believe that for a second because since Aristocrat purchased these games from Churchill Downs in November 2017, there are numerous articles (see copies attached) stating that their revenue has \*tripled\* and I can only

conclude that it's due to their greedy game tactics, by not letting players win with free coins and forcing them to buy more coins to continue playing. And I'm not the only player complaining. There are thousands of players complaining about the losses and being forced to "pay to play" - their comments are under their player profiles.

Anyway, I apologize for the length of this email but I hope you will review and forward to the appropriate parties who may be involved in the recent Federal ruling, to give them a player's perspective on Big Fish games and how they are ripping off the consumer.

Thank you,

Debbie Taylor

[Arlington, TX](#)