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done, to separate gamers from their (or their parents') money, and section 5's prohibition against unfair or deceptive practices is likely to be the most useful tool in such cases. But, as *Keppel* makes clear, section 5's prohibition against unfair methods of competition is another potentially relevant tool, especially in circumstances in which loot boxes operate to keep gamers hooked on their own game instead of competitors' games.

When the facts support competition as well as consumer-protection theories, the Commission should fully execute our Congressional mandate by pleading all law violations we uncover. In short, the gaming industry should be on notice that wanton use of loot boxes may create exposure to multiple theories of liability. Children may be unable to assess low-probability events, but responsible video-game publishers would be well advised not to take the chance of getting themselves hooked on loot boxes.