IN-GAME CURRENCIES, SKIN GAMBLING, AND THE PERSISTENT THREAT OF MONEY LAUNDERING IN VIDEO GAMES

J. Gregory Cloward and Brett L. Abarbanel†*

INTRODUCTION

With an estimated 2.5 billion video gamers across the globe, the video game market is expected to be worth $90 billion by 2020.[1] Fortnite alone boasts 125 million monthly users, with monthly revenues of $300 million.[2] The rapid growth and scope of this market carries with it certain potential risks, including money laundering. Cybersecurity experts have warned that the massive, anonymous, online world of video gaming has become particularly appealing to small-time cybercriminals who exploit it to launder the money they steal online.[3] These crimes go largely unpunished, perhaps due to the (relatively) small amounts of money each individual cybercriminal is moving through the system.[4]

Title 18 Section 1960 of the U.S. Code ("Section 1960"), which criminalizes the unlicensed operation of money transmitting businesses,[5] may offer a way to crack down on these cybercriminals. Section 1960 can be used to police the third-party marketplaces and exchanges in which in-game currencies and items are bought and sold and increase accountability of video game developers by policing the microtransactions that take place inside their virtual worlds. This article looks at whether a court might find in-game currencies

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* Greg Cloward is a Research Assistant for the International Gaming Institute at the University of Nevada, Las Vegas (UNLV) and a second-year law student at UNLV's Boyd School of Law.

† Brett Abarbanel is Director of Research, International Gaming Institute, and Assistant Professor, William F. Harrah College of Hospitality, at the University of Nevada, Las Vegas; and Research Affiliate, Gambling Treatment & Research Centre, University of Sydney.

1 *2019 Video Game Industry Statistics, Trends & Data*, WEPC, https://www.wepc.com/news/video-game-statistics/ (last updated Nov. 2019).

2 *Sixgill Report: Carding and The Digital Gaming Industry*, SIXGILL (Jan. 23, 2019) (on file with author).

3 *See id.*; *see also* Jean-Loup Richet, *Laundering Money Online: A Review of Cybercriminals' Methods*, UNITED NATIONS OFFICE ON DRUGS AND CRIME (June 1, 2013), https://arxiv.org/ftp/arxiv/papers/1310/1310.2368.pdf.

4 *See generally* discussion *infra* pp. 4–5.

5 18 U.S.C. § 1960 (2018).

(e.g., World of Warcraft gold or Fortnite V-Bucks) or virtual items (e.g., in-game aesthetic items [skins] or gold keys used to open loot boxes) to fall within the purview of Section 1960. Its focus is exploring the use of the statute to curtail money laundering in video games.[6]

I. THE BACKGROUND OF SECTION 1960 AND THE VIDEO GAME INDUSTRY'S MONEY LAUNDERING PROBLEM

In the 1990s, money launderers responded to the anti-money laundering ("AML") legislation of the previous decade by gravitating toward nonbank financial institutions ("NBFIs") (wire remitters, currency exchangers, check cashers, etc.).[7] As part of Congress's response to this new threat, it enacted 18 U.S.C. § 1960, which criminalizes the unlicensed operation of money transmitting businesses.[8] By 2001, the statute was amended twice, resulting in three ways a money transmitting business might violate Section 1960: (1) failing to obtain the requisite state license to operate a money transmitting business; (2) failing to register as a money transmitting business with the federal government; or (3) operating a money transmitting business with the knowledge that the funds being transmitted were derived from criminal activities.[9]

Using video games to launder money is not new. In a 2013 report to the United Nations Office on Drugs and Crime, security researcher Jean-Loup Richet highlighted the ways in which money launderers can use in-game currency in massive multi-player online role playing games ("MMORPGs") such as World of Warcraft to transfer their dirty money to another account (their own or that of an associate), then exchange that in-game currency for clean, real currency.[10] In a 2018 interview, Richet went into more detail, using the example of a cybercriminal who has stolen a PayPal account containing 1,000 euros:

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[6] This article does not speculate as to whether the government could successfully prosecute a video game developer or a third-party website under Section 1960. The statute's *mens rea* requirement would likely pose a significant hurdle for the prosecutors to overcome, at least on the first attempt (*see id.*, referencing the "knowingly" language that this article does not address).

[7] *See* Courtney J. Linn, *One-Hour Money Laundering: Prosecuting Unlicensed Money Transmitting Businesses Under 18 U.S.C. § 1960*, 8 U.C. DAVIS BUS. L.J. 138, 138–39 (2007).

[8] *Id.* at 139.

[9] *Id. See* United States v. Budovsky, No. 13cr368 (DLC), 2015 WL 5602853, at *1 (S.D.N.Y. Sept. 23, 2015) (using Section 1960 to prosecute Arthur Budovsky, the founder Liberty Reserve); U.S. v. Faiella, 39 F. Supp. 3d 544, 545 (S.D.N.Y. 2014) (noting that Section 1960 has been used to prosecute notable criminals such as Robert "BTCKing" Faiella, a prominent Bitcoin exchanger on the dark web website, Silkroad).

[10] Richet, *supra* note 3.

> "The first step is to make things look fuzzy. A hacker will not send the stolen PayPal money directly into his personal bank account. So first, I will forward the amount of this PayPal account to two other fake PayPal accounts that I will create with remote administration tools [software that allows a hacker to control a victim's computer]. This way, it will be more difficult for police officers to investigate this case."
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> "Then I will use an exchanger and will change the money to any online currency. Depending on my level of paranoia, I might exchange it into bitcoin, and then I might use another exchanger to turn it into World of Warcraft gold coins."[11]

From there, the cybercriminal can sell the gold coins for virtual currency and repeat the process until ready to withdraw the funds into real currency.[12] Similarly, a recent report by the cyber intelligence firm Sixgill highlighted how some Fortnite users launder money by using stolen credit cards to stack Fortnite accounts with in-game currency and virtual items called skins (discussed below), and then sell the entire accounts on third-party marketplaces for a fraction of their value.[13]

Online marketplaces make it simple to use real currency to buy and sell in-game currency, skins, gold keys used to open loot boxes (discussed below), or entire player accounts.[14] This process does come at a cost; while each additional step makes the stolen money less and less traceable, each step comes with an exchanger's fee or commission, cutting into the cybercriminal's profits.[15]

Alternatively, a cybercriminal might use a skin gambling website to launder money. "Skins" are virtual items in video games used to change the appearance or improve the performance of a player's in-game avatar, weapon, or item.[16] Skins can be purchased, traded, or obtained via "loot boxes" (in-game boxes which contain a range of skins of different values and which are opened using keys that are purchased or earned via gameplay[17]).[18] Skin

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[11] Steven Messner, *How Microtransactions and In-Game Currencies Can Be Used to Launder Money*, PC GAMER (Apr. 13, 2018), https://www.pcgamer.com/how-microtransactions-and-in-game-currencies-can-be-used-to-launder-money/ (brackets and quotations in original).

[12] *Id.*

[13] *See Sixgill Report*, *supra* note 2, at 2.

[14] *See, e.g.,* PLAYERAUCTIONS, https://www.playerauctions.com/ (last visited Jan. 6, 2020).

[15] Messner, *supra* note 11.

[16] Desirée Martinelli, *Skin Gambling: Have We Found the Millennial Goldmine or Imminent Trouble?*, 21 GAMING L. REV. 557, 558 (2017).

[17] *Id.* at 559.

[18] Brett Abarbanel, *Gambling vs. Gaming: A Commentary on the Role of Regulatory, Industry, and Community Stakeholders in the Loot Box Debate*, 22

gambling sites allow users to play traditional casino games (e.g., roulette or slots) using skins in lieu of casino chips.[19] Using a skin gambling site, a cybercriminal might use various accounts to split up their "deposit" into smaller sums, "buy-in" to the casino game using skins, wager the required amount (up to 100% of the initial[20]) or more to appear legitimate, and then withdraw the money.[21]

These methods can involve relatively little money per individual and would not be suitable for laundering hundreds of thousands (let alone millions) of dollars. As Richet explained, passing even $10,000 through such a system would be an "astronomical" amount.[22] The relatively small stakes per individual may explain why no cybercriminal has been prosecuted for laundering money using video games. These systems do, however, enable small-time cybercriminals to launder money presumably with little fear of retribution (unless the game developer catches something fishy and confiscates the player's account), creating a significant cyber security threat when taken in the aggregate.[23] Section 1960 represents a possible way to crack down on this underworld without prosecuting each cybercriminal individually.]

II. SECTION 1960 IN PRACTICE AND IN THEORY

Whether Section 1960 could be used to prosecute the exchangers of in-game currencies, skin gambling site operators, or virtual marketplaces largely depends on whether courts would find in-game currencies or skins to constitute "funds" under Section 1960. While the likelihood of this may turn on whether a court finds in-game currencies or skins to be virtual currencies or to be zero-value currencies, it is possible that *either* could be considered "funds" under Section 1960. Virtual currencies are "digital representations of value that [are] neither issued by a central bank or a public authority[,]" but are largely used for the same transactions as fiat currency.[24] Virtual currencies have also come to encompass zero-value currencies, digital units which are assigned no value by

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GAMING L. REV. 231, 231 (2018).

[19] *See, e.g.*, CSGOEMPIRE, https://csgoempire.com/faq (last visited Jan. 6, 2020).

[20] *FAQ*, THUNDERPICK, https://thunderpick.com/en/content/faq (last visited Dec. 21, 2019).

[21] David Hoppe, *How Can Criminals Use Online Gaming to Launder Money?*, GAMMA L. (Nov. 27, 2017), https://gammalaw.com/how-can-criminals-use-online-gaming-to-launder-money/.

[22] Messner, *supra* note 11.

[23] *See Sixgill Report*, *supra* note 2, at 6 (Cybersecurity experts foresee no decrease in video game money laundering in the near future).

[24] John T. Holden, *Trifling and Gambling with Virtual Money*, 25 UCLA ENT. L. REV. 41, 49 (2018); *see* James Chen, *Fiat Money*, INVESTOPEDIA (Sept. 2, 2019), https://www.investopedia.com/terms/f/fiatmoney.asp (defining fiat money as currency which is issued by government (such as euros or U.S. dollars) and which is not backed by a physical commodity).

their issuer but which may be exchanged on secondary markets for fiat currency or other forms of virtual currency.[25]

"Money transmitting" is defined broadly under Section 1960 and includes transferring "funds" (not just fiat currency) by "any and all" means.[26] Courts appear to agree that virtual currencies are considered "funds" under Section 1960.[27] Virtual currencies, which have been expressly found to fall within the purview of Section 1960, include Bitcoin and Liberty Reserve's LR.[28] Both Bitcoin and LR share similarities with in-game currencies (discussed below). No court has expressly held that zero-value currency falls within the purview of Section 1960. The case law relating to zero-value currencies and virtual items has largely shown that they do not hold real-world value (indicating that they might not fall under Section 1960), however, recent cases may indicate a change in this approach.

A. In-Game Currencies and Skins as Virtual Currencies

When determining whether a virtual currency falls within the purview of an AML statute, in addition to looking at precedent, courts have analyzed (1) the ordinary meaning of terms found within the statute and (2) the legislative history behind the statute.[29] The 2016 prosecution of Anthony Murgio, who was charged under Section 1960 for operating the illegal bitcoin exchange Coin.mx, is an example of a court applying these analyses.[30]

Section 1960 prohibits the transferring of "funds" by "any and all means."[31] The *Murgio* court began by looking to the ordinary meaning of the word "funds."[32] It used the dictionary to define "funds" as "available pecuniary resources."[33] "Pecuniary" is further defined as "consisting of" or measured in "money" which, in turn, is defined as "something generally accepted as a

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[25] Holden, *supra* note 24, at 41, 95 n. 367.

[26] United States v. E-Gold, Ltd., 550 F. Supp. 2d 82, 82–83, 88 (D.D.C. 2008) (citing § 1960(b)(2)) (prosecution of operators of an online issuer of virtual currency known as e-gold).

[27] *Budovsky*, 2015 WL 5602853, at *14 (citing United States v. Faiella, 39 F. Supp. 3d. 544, 545–47 (S.D.N.Y. 2014)); s*ee also* United States v. Murgio, 209 F. Supp. 3d 698, 707–08 (S.D.N.Y. 2016) (using Webster's dictionary, legislative history, and precedent in finding Bitcoin to constitute "funds" under § 1960 during the prosecution of operators of Bitcoin exchange Coin.mx); *E-Gold, Ltd.*, 550 F. Supp. 2d at 85, 88, 93; United States v. Ulbricht, 31 F. Supp. 3d. 540, 569–70 (S.D.N.Y. 2014) (finding Bitcoins to fall within the purview of 18 U.S.C. § 1956, the AML statute under which Ross "Dread Pirate Roberts" Ulbricht, the founder of Silk Road, was prosecuted).

[28] *Budovsky*, 2015 WL 5602853, at *14; *Faiella*, 39 F. Supp. 3d. at 545.

[29] *Murgio*, 209 F. Supp. 3d. at 707–08.

[30] *See id.*

[31] 18 U.S.C. § 1960(b)(2) (2018).

[32] *Murgio*, 209 F. Supp. 3d. at 707.

[33] *Id.*

medium of exchange, a measure of value, or a means of payment."[34] The court then cited the prosecution of Silkroad founder Ross "Dread Pirate Roberts" Ulbricht under 18 U.S.C. § 1956,[35] where the *Ulbricht* court had included "an object used to buy things" within the ordinary meaning of "money."[36] Other courts have also applied this analysis to Section 1960.[37] The *Murgio* court agreed with the *Ulbricht* court in finding that bitcoins qualified as "funds" or "money" because they "can be easily purchased in exchange for ordinary currency, act[ ] as a denominator of value, and [are] used to conduct financial transactions."[38]

The *Murgio* court next looked to the legislative history of Section 1960 to determine whether applying Section 1960 to bitcoins would be in line with its original intent.[39] Citing the Senate Report behind the passing of the legislation, the court concluded that Congress passed Section 1960 with the intent of preventing money launderers from using innovative ways to transmit money illicitly and to "keep pace with. . .evolving threats,"[40] and again concluded that bitcoins constituted "funds" under Section 1960.[41] Multiple courts have followed similar analyses to reach the same conclusion regarding bitcoin and other virtual currencies.[42]

Similarly, and as discussed above, in-game currencies can both act as a medium of exchange and be exchanged into real currency. Video games and their currencies function like the now-defunct website Liberty Reserve and its currency LR. Liberty Reserve users could not directly deposit or withdraw funds and had to use third-party exchangers to change real currency into LR and vice-versa.[43] Similarly, while an individual can purchase in-game currencies directly, they need an exchanger to convert it to real currency.[44]

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[34] *Id.*

[35] While Section 1956 might also apply to video game developers or third-party marketplaces, such an analysis falls outside of the scope of this article.

[36] *Murgio*, 209 F. Supp. 3d. at 707.

[37] *See, e.g.*, United States v. Mansy, No. 2:15-cr-198-GZS, 2017 WL 9672554, at *1, (D. Me. May 11, 2017).

[38] *Murgio*, 209 F. Supp. 3d. at 707 (citing United States v. Ulbricht, 31 F.Supp.3d. 540, 570 (S.D.N.Y. 2014)) (quotes and brackets in original).

[39] *Id.* at 708.

[40] *Id.* (citing S. Rep. No. 101–460 (1990)).

[41] *Id.*

[42] *See, e.g.*, *Budovsky*, 2015 WL 5602853, at *10.

[43] *Id.* at *1.

[44] *See* Daniel Terdiman, *Virtual Gaming's Elusive Exchange Rates*, CNET (Aug. 5, 2005, 9:13 AM), https://www.cnet.com/news/virtual-gamings-elusive-exchange-rates/.

Under the final factor of a "plain meaning" analysis, something constitutes "funds" under Section 1960 when it is "generally accepted as. . .a means of payment."[45] Whether in-game currencies satisfy this definition varies by game. While it is unclear whether using the in-game currency to purchase in-game items would be persuasive to a court, there are examples of virtual items that may be purchased using *either* fiat currency or in-game currency. For example, in *Gwent: The Witcher Card Game*, players may use either in-game "ore" or fiat currency to purchase "card kegs" by which players obtain additional cards to add to their deck (see illustration below). Such examples could support a conclusion that in-game currency is generally accepted as a means of payment.

Fig 1. Screenshot of item shop in *Gwent: The Witcher Card Game* (image acquired Apr. 12, 2019).

Applying the analysis used for other virtual currencies to in-game currencies—considering the massive secondary exchange markets for in-game currencies[46]—would not take much broadening of precedent. Indeed, some state statutes appear to have left the door open for such a finding. New York's regulation governing "virtual money businesses" excludes specifically "digital units that. . .are used *solely within* online gaming platforms" implying that digital units which can be used *outside* online gaming platforms (e.g., exchanging for other digital currencies) might constitute virtual currency under

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[45] *Murgio*, 209 F.Supp.3d. at 707.

[46] Some estimates put the market size for in-game item exchanges at $50 billion. *See* WAX io, *How on Earth is Trading Virtual Items in Video Games a $50 Billion Industry*, MEDIUM (Dec. 11, 2017), https://medium.com/wax-io/how-on-earth-is-trading-virtual-items-in-video-games-a-50-billion-industry-5972c211d621.

New York law.[47]

The argument for courts to consider virtual skins or loot box keys "funds" under Section 1960 is more attenuated. Under the *Murgio* court's ordinary meaning analysis, these virtual items do not act as a medium for exchange, but may be exchanged (on a skins marketplace) into real currency that can be used to pay for things.[48] Additionally, skins are widely traded between players, potentially constituting a generally accepted means of payment. Some courts, however, have held that virtual items do *not* hold real world value[49] (discussed further below). As such, there is a possibility that virtual items could fail the requirement that they act "as a denominator of value."[50]

If a court were to find that in-game currencies constitute virtual currency as defined above, it is also likely that in-game currencies would be found to be "funds" under Section 1960. Furthermore, it is likely that authorities could prosecute operators of third-party marketplaces which exchange in-game currencies for other virtual or fiat currencies for operating a money transmitting business without the requisite license. Similarly, if skins or other virtual items were found to be virtual currencies, skin gambling websites would also likely be considered money transmitting businesses under Section 1960.

B. In-Game Currencies and Skins as Zero-Value Currencies

In the context of video games, courts have generally held that in-game currencies and virtual items do not hold real-world value, meaning that the items likely fail the ordinary meaning analysis of "money" that courts have used in applying Section 1960 in the past. Each case discussed below was brought against video game developers by players who were trying to recover economic losses allegedly suffered at the hands of alleged illegal in-game gambling devices. The courts analyzed whether the virtual items held real world value for the purposes of satisfying the "prize" element of the traditional legal definition of gambling.[51] While not precisely on point as relating to a Section 1960 analysis, the holdings in these cases may provide insight into how a court might deal with virtual items in video games and their related real-world value.

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[47] *See* N.Y. FIN. SERV. LAW, § 200.2(p)(1)(i) (McKinney 2019) (emphasis added).

[48] *See Murgio*, 209 F.Supp.3d. at 707 (citing United States v. Ulbricht, 31 F.Supp.3d. 540, 570 (S.D.N.Y. 2014)).

[49] Sebastian Schwiddessen & Philipp Karius, *Watch Your Loot Boxes! – Recent Developments and Legal Assessment in Selected Key Jurisdictions from a Gambling Law Perspective*, 1 INTERACTIVE ENT. L. REV. 17, 33–35 (2018).

[50] *See Murgio*, 209 F.Supp.3d. at 707 (quoting United States v. Ulbricht, 31 F.Supp.3d. 540, 570 (S.D.N.Y. 2014)).

[51] *See* Mason v. Mach. Zone, Inc., 140 F. Supp. 3d 457, 460–61 (D. Md. 2015); *see also* Soto v. Sky Union, LLC, 159 F. Supp. 3d 871, 882 (N.D. Ill. 2016).

In *Mason v. Machine Zone, Inc.* and *Soto v. Sky Union, LLC*, each court held that virtual items, including in-game currency, in-game casino chips (in *Game of War: Fire Age*), and additional characters called "heroes" (in *Castle Clash*) did not hold real world value because they could not be cashed out into real currency.[52] However, the Ninth Circuit recently held that virtual casino chips *do* hold real-world value if they extend the player's in-game playing time.[53] In *Kater v. Churchill Downs, Inc.*, the plaintiff sought to recover losses suffered in the game *Big Fish Casino*.[54] While the game could be downloaded and played free of charge with a stock number of casino chips, users had the option of purchasing additional casino chips to continue playing after their free play ran out.[55] The court held that because winning additional chips extended playing time in the same manner that purchasing additional chips would, the virtual chips constituted a thing of value because they extended the "privilege of playing" the game.[56]

Each plaintiff in the preceding cases argued the virtual items held real-world value because entire player accounts could be sold on secondary markets.[57] The *Machine Zone* and *Sky Union* courts categorically rejected these arguments because determining value for the individual items or characters based on the value of an entire account was too attenuated.[58] While these rulings left open the question of whether the virtual items *sold individually* would hold real-world value,[59] the *Kater* court rejected the "secondary market" argument entirely because selling player accounts on a secondary market would be a flagrant breach of the game developer's terms of service.[60] The court refused to allow the plaintiff to recover her losses and held the virtual chips could not constitute a thing-of-value based on the plaintiff's own prohibited use.[61] While the *Kater* court's holding answered the "thing-of-value" question in the context of denying a plaintiff relief under unlawful gambling recovery laws, whether virtual items can acquire real-world value in other settings by being sold on a secondary market remains unclear.[62]

Another way in which skins might hold real world value is their use as proxies for chips or tokens in traditional casino games. Persons can use skins in

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52 *See Mach. Zone, Inc.*, 140 F. Supp. 3d at 465; *see also Sky Union*, 159 F. Supp. 3d at 879–81.

53 Kater v. Churchill Downs, Inc., 886 F.3d 784, 787–88 (9th Cir. 2018).

54 *See id.* at 786.

55 *Id.* at 785–86.

56 *Id.* at 787–88.

57 Mason v. Mach. Zone, Inc., 140 F. Supp. 3d 457, 468–69 (D. Md. 2015); Soto v. Sky Union, LLC, 159 F. Supp. 3d 871, 879 (N.D. Ill. 2016).

58 Schwiddessen, *supra* note 49, at 35.

59 *Id.*

60 *Id.*

61 *Id.* at 36.

62 *Id.*

place of casino chips for games such as roulette.[63] As opposed to traditional gamblers, skins gamblers do not "buy-in" to games using tokens exclusive to the website.[64] Rather, players deposit their own skins into the site and withdraw them for use on other sites or in video games when done gambling.[65] Considering that skins and keys have value on gambling sites, marketplaces, exchanges, and in games, a court may well find skins to be generally accepted as a measure of payment.[66]

CONCLUSION

Section 1960 was passed as part of an effort to limit the methods by which criminals could use NBFIs to launder money.[67] As video games have evolved into a multi-billion-dollar industry,[68] the question of whether in-game currencies or skins and keys fall within the purview of Section 1960 is timely. Courts have uniformly applied Section 1960 to virtual currencies such as Bitcoin and LR.[69] Similar reasoning could be used to determine whether in-game currencies or skins are considered "funds" under the statute. If these virtual items are indeed found to be "funds," certain online marketplaces and skins gambling websites likely violate Section 1960 under any (or all) of its three disjunctive prongs.

As security researcher Jean-Loup Richet noted, there is no indication that game developers are party to these money laundering schemes.[70] However, should a game developer choose to permit in-game currencies or items to be exchanged back into real currency, they may be considered money transmitters and thus subject to Section 1960's registration requirements. The most recent estimation found that registering as a money transmitter in all 53 states and territories would come at a cost of roughly $176,200 initially and $137,000 annually.[71]

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[63] Mark Doman, *Counter-Strike: Valve, Twitch Announce Crackdown on Controversial Skins Gambling*, AUSTRALIAN BROADCASTING CORP. NEWS (July 14, 2016 11:06 PM), https://www.abc.net.au/news/2016-07-15/valve-announces-crackdown-on-counter-strike-skins-gambling/7632404; *see, e.g.*, CSGOEMPIRE, *supra* note 19.

[64] Casino chips generally remain property of the issuing casino, and are only used by players as "representatives of value" for the debt owed to the casino. *See, e.g.*, Nev. Gaming Comm'n Reg. 12.060(8) (Mar. 2017).

[65] *See, e.g.*, CSGOEMPIRE, *supra* note 19.

[66] *See Murgio*, 209 F.Supp.3d at 707.

[67] Linn, *supra* note 7, at 23–41.

[68] WEPC, *supra* note 1.

[69] *See Budovsky*, 2015 WL 5602853, at *14; *see also Faiella*, 39 F.Supp.3d at 545.

[70] Richet, *supra* note 3, at 13.

[71] Ashley Grimes, *Money Transmitter Licensing*, GRIMES L. (2014), http://www.grimeslawaz.com/money-transmitter-licensing/.

States are unlikely to find reason to deny a game developer a money transmitting license. However, by requiring the game developers to obtain licensing along with the skin gambling sites and virtual marketplaces, states will effectively have the regulatory teeth to close these third-party sites (unless the site operators wish to risk criminal prosecution) while continuing to allow game developers to operate within their boundaries. While the fees associated with registering as a money transmitting business are not numbers to disregard, game developers would receive the benefit of having the government police the unlicensed use of their intellectual property.

The ease with which small-time cybercriminals can launder money using in-game currencies, skins marketplaces, and skin gambling sites runs counter to the legislative intent behind Section 1960. Should a prosecutor wish to crack down on this underground world, Section 1960 may be the statute under which to proceed.