

Section 2

Open letter to the Washington State Gambling Commission

Investigated by: Agent Kal

Open letter to the Washington State Gambling Commission

Open letter to the Washington State Gambling Commission

Ten days became ten years. The Commission's 2016 question to Valve has not been answered with an operator-by-operator record; this letter asks it to reopen the file.

PUBLIC ADDRESS · WASHINGTON STATE GAMBLING COMMISSION

Ten days became ten years.

Reopen the record.

To the Washington State Gambling Commission:

In 2016, Director David Trujillo asked Valve to show what it had done to stop the use of Steam skins for gambling. Then-Chair Chris Stearns and the Commission confronted an industry built on Valve-issued items and Steam transfers. Both men have since left their Commission roles. The question they put to Valve has not expired.

Valve's general counsel, Karl Quackenbush, gave gambling operators ten days to stop commercial use of Steam accounts. In its October response to your Commission, Valve denied facilitating gambling, said it had sent cease-and-desist letters to more than forty sites and said it had disabled associated accounts. It also defended preserving Steam trading and OpenID because those services benefited customers and game developers. **That was an assertion of control. It deserves a test, not deference.**

In our assessment, Valve's answer did not demonstrate that its chosen enforcement matched the scale of the network it described. A threatening letter to an operator is not the same thing as a durable block on the Steam accounts, trading infrastructure and authentication routes that make the business work. Reported estimates put [CS:GO Lounge alone above \\$1 billion in betting handle during 2016](#); that is an outside estimate of wagers, not Valve revenue, and the site's original skin-betting operation later shut down. The scale made verifiable enforcement essential.

Today, Valve's own [Subscriber Agreement archived 2026-09-21 ↗](#) restricts commercial exploitation except where expressly permitted and separately prohibits specified forms of automation. Our [dated route register](#) records declared OpenID return hosts for outside services; `openid.realm` and `openid.return_to` are fields sent to Steam, not secrets hidden from it. Our [Link Filter checks](#) show cases where a main address was warned against but an associated login host was not. A filter result alone cannot prove that Valve allowed a login or that a particular bot evaded an account ban. **It does prove that a homepage warning cannot be offered as a complete answer about access.**

Nor can the existence of useful, lawful Steam trading and OpenID functions answer whether prohibited operators were actually excluded. Valve's own rules allow express exceptions. If Valve relies on that distinction, the Commission should ask it to identify the authorisation, account controls and enforcement criteria applicable to commercial skin businesses, and the specific non-gambling uses it invoked in 2016. The mere possibility of lawful use is no answer to documented prohibited use.

We ask the Commission to revisit its 2016 file and request an operator-by-operator account: which Steam accounts and trading bots were disabled after the ten-day notices; whether related accounts or return hosts were monitored; which operators later regained access; what exemptions were granted; and what records support Valve's statement to the Commission. Publish what law allows the public to inspect. Compare those

records with current routes and with Valve's later interventions, including [OPskins in 2018 archived 2026-03-07 ↗](#).

The notice set a ten-day deadline in July 2016; ten years is long enough to establish whether it was carried out. The Commission should test Valve's 2016 account against the infrastructure that remains observable today.

The Steam Dossier investigation · Public statement, 20 September 2026

[2016 Commission notice ↗ archived 2026-05-20 ↗](#) · [Valve's 2016 reply_\(document copy\) ↗](#) · [Valve's 2016 OpenID statement ↗ archived 2026-09-21 ↗](#) · [Current Steam agreement ↗ archived 2026-09-21 ↗](#) ·

Timeline of the 2016 exchange: [Section 11 →](#)

[Download PDF](#)

[Download JSON](#)

[Download PGP signature](#)

PhishDestroy · file integrity signature for this fact

[Material record ↗](#)