

Seeing, Moving, Catching, Accumulating: *Pokémon GO*, and the Legal Subject

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Published online: 24 July 2017
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Abstract This paper argues that the augmented reality gaming application for smart devices, *Pokémon GO* shows the fate of the legal subject as a neoliberal monster subjugated to the limitations imposed by hypercapitalism. The game, derived from Nintendo’s iconic Pokémon franchise, reveals the legal subject as a frenzied, diminished and impulsive being, allowed to see, move, catch and accumulate but unable to participate in more meaningful self-narration. It is not that the game is lawless, notwithstanding, anxieties in the semiosphere about users trespassing or engaging in criminal behaviour. Rather the game is over structured and highly limited, both within its game-play which is repetitive and impulsive, and in its absence of narrative. Unlike the classic Nintendo Pokémon games which are within the role-playing game genre, *Pokémon GO* abstracts the seeing, moving, catching and accumulating features of the classic games without the overarching narrative, questing and competition. In this *Pokémon GO* manifests the transformation of the liberal legal subject of capitalism to the neoliberal subject of a digital orientated hypercapitalism where seeing, moving, catching and accumulating is immediate and impulsive, obliterating the ‘prudent’ subject participating in their own self-narration.

Keywords Legal subject · Digital · Augmented reality · *Pokémon* · Hypercapitalism · Neoliberalism

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1 Introduction

On 6 July 2016, Niantic released *Pokémon GO* [66] an augmented reality game for mobile smart devices derived from the popular Nintendo Pokémon franchise [36, 37]. The game and its playing—witnessed by hordes of screen absorbed players seemingly wandering purposelessly through public and private spaces—immediately suggested law, with much discussion within the semiosphere of the potential illegalities encouraged by the game [20]. This article argues that there is more of law seen in the game than simple anxieties of trespass or dangerous driving. It is argued that the impulsive seeing, moving, catching and accumulating of the game reveals the diminished legal subject of hypercapitalism that only sees, moves, catches and accumulates who is unable to participate in more meaningful self-narration. Ultimately, what is seen and caught on the interactive small screens is the neoliberal subject of hypercapitalism; a monster possessing base freedoms but denied the prudence to plan and work towards a better future.

This argument is in three sections. The first section locates the analysis within the emerging discipline of visual jurisprudence. It does so by emphasising how software and games can be seen as visual jurisprudence's apotheosis. This section concludes by setting out the essential features of *Pokémon GO* in seeing, moving, catching and accumulating. The second section highlights *Pokémon GO*'s interception with legality; not only are the mundane anxieties of law-breaking considered but also the coded, rigid legality of its game play. The third section draws upon a comparison with the role-playing game (RPG) focus of the classic Pokémon games to perceive the diminished legal subject projected by *Pokémon GO* as a neoliberal subject wrought by the totality of digital orientated hypercapitalism. In the demise of narrative, the neoliberal legal subject is seen as a monster possessing base freedoms of seeing, moving, catching and accumulating, but firmly located in an overdetermined present unable to prudently plan and work towards a better life.

2 Visual Jurisprudence, Video Games and *Pokémon GO*

This section frames the article's interrogation of the form of the legal subject caught by *Pokémon GO* within visual jurisprudence. It is suggested that software and games are visual jurisprudence's apotheosis. Having examined existing visual jurisprudence literature that has considered video games, this section concludes by setting out the essential features of *Pokémon GO* in terms of seeing, moving, catching and accumulating.

Reading, writing and oral persuasion are the cornerstones to modern law. However, the digital revolution in information is shifting law towards the ocular and visual; seeing, rather than reading and writing, are becoming essential components to the operation of law [99]. As such, visual jurisprudence with its focus on 'the cultivation of visual literacy and its engagement with the visual eloquence' [90: 187] has firmly established its increasing relevance [23: 3]. This visual focus has resulted in a diversity of material explored; from the formal and historical field of

legal emblems [33, 34], to the contemporary mundanity of road signs [58–60, 101]. While there have been numerous studies of the relationship between images and law, the relationship between the digital, or more specifically the ‘interactive’ image, and law is still in its infancy. For example, Richard Sherwin considers the use of digital images and digital simulations in the courtroom but these images on powepoint slides and in video evidence are passive; the jurisprudence is in the decoding of meaning and emotion in these visuals [90: 74–82]. Video games differ in that there is an element of interaction required that is provided through the software and hardware [24]. There is the potential that the meaning, outcomes, processes and narratives of the same game will be unique to each user. As such, interactive software and video games are pushing the boundaries and application of visual jurisprudence. It seems that in coupling the image with interaction, the video game is the apotheosis for a digitalising culture that requires the ‘cultivation of visual literacy and its engagement with the visual eloquence’, to live within an interactive video-sphere.

However, notwithstanding this connection between video games and visual jurisprudence there are few sustained explorations of video games in the context of law. Michael Barnett and Cassandra Sharp explore law, morality and choice through a close reading of the narrative choices [10] within the 2009 PlayStation 3 open world platforming action adventure *inFAMOUS* [95]. Ashley Pearson and Kieran Tranter highlight the importance of the video game medium as a way to approach digital legality through an analysis of the Nintendo’s definitional platformer Super Mario franchise [73]. Robbie Sykes, in this issue, examines the 1997 PlayStation RPG *Final Fantasy VII* [94] to critique earth jurisprudence [92] and Ashley Pearson has recently identified in the cult 2008 PlayStation 2 RPG *Persona 4* [4] the psychology and psychosis of the legal persona [72].

This emerging visual jurisprudence of the video game has a distinct focus on static gaming, where the gamer plays at a specific place, at a specific time, through a specific medium and for a specific period of time, through a home game console. Something that Pearson notes but does not draw further [72: 4] is the feature of mobile gaming that is part of *Persona 4* having been ported and updated in 2012 to the PlayStation Vita mobile platform as *Persona 4 Golden* [5]. Mobile gaming adds a further complexity beyond static console games, as the immersive interaction experience of the game can move beyond the television-console to be geographically unrestricted [17]. It is somewhat fitting then that the Nintendo Game Boy which played the originating Pokémon games—*Pokémon Red* [28] and *Pokémon Blue* [27]—was a handheld portable console. Indeed, mobile gaming could be seen as having its origins with the Nintendo’s Game and Watch series that began in 1980 [48]. However, with the emergence of smart devices mobile gaming applications expand the accessibility and the population of potential users [47: 31]. Notwithstanding, the popularity of the initial Nintendo Game Boy, it was highly restricted. Predominately seen and marketed as a children’s toy [57: 1665], there was a high entry cost to this early form of mobile gaming. Users had to purchase the Game Boy console and then purchase individual games preloaded onto cartridges. The contemporary ubiquitousness of smart devices means that these age and cost restrictions to mobile gaming have largely dissipated [48: 64]. While mobile apps

have been explored from a legal perspective by Lyndal Sleep and Kieran Tranter in this issue on their research on Australia's social welfare mobile application [93], mobile gaming applications have yet to be explored from a legal perspective.

Pokémon GO is particularly interesting as it is one of the first games to integrate real-time GPS data as well as augmented reality technology into the game play [61: 48]. Not only is the game mobile in that it is an app on a smart device, but user movement, and tracking that movement, is intimate to the game play. As a free-to-play game developed by Google offshoot Niantic [31: 48–49], *Pokémon GO* uses the device's GPS function to locate and 'catch Pokémon in the real world' [79]. The essential features of the game can be reduced to seeing, moving, catching and accumulating. Users create avatars that reflect the user's physical position and movement on an on-screen map that is continuously being refreshed drawing upon Google Map data. Users hold their smart phone in their hand where they can see their avatar's position on the map in relation to digital landmarks of Pokéstops and Gyms. The avatar moves on the screen when the player moves in the physical world. The Pokémon egg feature of the game directly rewards movement for movement's sake where eggs hatch due the distances in the physical world that the user has walked [68: 5]. By navigating various locations in physical space, cute, cartoon 'pocket monsters' or Pokémon spawn on the on-screen map which the player can catch and record in their Pokémon encyclopaedia, the Pokédex. The augmented reality aspect of the game is manifest in the catching stage where the physical surrounds of the user is captured in real-time by the device's camera and the Pokémon is projected into that image-feed. The purpose of *Pokémon GO*, following the established catchcry of the franchise [14] is to 'Catch'em all', that is to catch and accumulate all Pokémon to complete the Pokédex [78]. A large portion of the game consists of accumulation. Beyond collecting Pokémon, there are many collectable items available via the Pokéstops including several types of Pokéballs used to catch Pokémon, types of berries to sedate Pokémon making them easier to catch and coins used for purchasing items. Further, there are items that allow Pokémon to upgrade such as Pokémon candy which can be collected by catching or trading in Pokémon.

The immediate, overwhelming popularity of *Pokémon GO* on its release can be attributed to the nostalgia for the Pokémania of the late-1990s [46: 38–9]. The Pokémon franchise has been a pop culture icon since the 90s [41: 5]. Initially released in Japan in 1996 and then in North America and Australia in 1998, the games and accompanying cartoon series, films, trading cards and plush toys and merchandise have remained a persistent global cultural icon [1, 7, 3: 175] with the latest instalment of Nintendo handheld Pokémon games, *Pokémon Sun* [30] and *Pokémon Moon* [29] released in November 2016. While the initial Pokémania did involve anxieties concerning the suitability of some of the game's metanarrative for children [77, 104], the post-*Pokémon GO* mania had a distinctly more manic emphasis on illegalities and public nuisance.

It is this anxiety-law nexus that suggests that beyond the hype and the *kawaii* graphics there is something about what is legal and lawful and the subject of law that is manifested through the game and its playing. In its seeing, moving, catching and accumulating generations of legal subjects can be identified. However, before

this catching and identification, the legality of *Pokémon GO* needs to be established, and it is this preparatory training that the next section turns.

3 The Illegalities and Legalities of *Pokémon GO*

This section highlights *Pokémon GO*'s interception with legality. From launch *Pokémon GO* created anxieties within the semiosphere about illegality. However, this illegality disclosed a rigid legality of unflinching code. *Pokémon GO* presents as a physical-digital hybrid encoding an illegality-legality complex. In identifying this complex the focus shifts to the image of the legal subject projected by *Pokémon GO*.

From its release, there have been many news articles and opinion pieces on the potential illegalities that playing *Pokémon GO* could promote, and legislators even presented draft laws to combat its gameplay [11, 22, 38, 53, 64, 100]. The primary concern stemmed from the augmented technologies that lead to screen obsessed *Pokémon GO* users trespassing or causing public nuisance [89: 675]. Users were admonished for catching gas type Pokémon in a holocaust museum and subsequently sharing screenshots of gameplay depicting the Pokémon overlaid on the image of the museum [26]. The police in Darwin in the Northern Territory Australia posted a message on Facebook days after the game's release teaching users the finer points of the game by explaining that users do not have to enter a police station in order to access the Pokéstop or Pokémon that has spawned on the player's device [87]. There were many reports of personal homes being labelled as a Pokéstop or Gyms which attracted unwanted foot-traffic onto private property without the owner's knowledge or consent [50]. A class action is ongoing in California by property owners against Niantic and Nintendo for encouraging trespass.¹ *Pokémon GO* does not seem to possess an omniscient internal adviser to the extent seen in classic Nintendo Pokémon games where Professor Oak would prevent a user from doing something or using an item inappropriately by reminding players that 'This isn't the time to use that!'²

The hub of the illegality issue is that *Pokémon GO*, as an augmented reality game using big data and algorithms to generate an open location, worldwide play space, was released without direct human oversight and without appropriate checks and balances on user activity. *Pokémon GO* is the second location based, augmented reality game developed by Niantic and it incorporates many features of the predecessor game *Ingress* [65]. Pokéstop and Gym locations are based on popular locations identified in Google Maps data, Niantic's archive of *Ingress* data, and also user submissions and suggestions. Nevertheless, forums for both iterations of Niantic's games have had posts that suggest continual ongoing issues with algorithms generating inappropriate sites for Pokéstops and Gyms [82, 83].

¹ In Re Pokémon GO Nuisance Litigation, No 16-cv-04300, 216 WL 6126786 (N.D. Cal. Sept, 23, 2016. On the case see [85]: 345–349.

² Professor Oak appeared as a speech bubble when you attempt to ride your bicycle indoors or cast a line where there is no water in the original *Pokémon Red* and *Pokémon Blue*.

While it was the unintended or unwitting trespass by *Pokémon GO* users that was the initial focus of public anxiety in the days after the game's launch [53], more illegalities were reported over 2016. There were reports of assault and personal injury caused while playing the game [32], reports that drivers of motor vehicles crashed while distracted with the game [6] or hit a wayward *Pokémon GO* occupied pedestrian [44], and, most alarming, criminals quickly realising that a Pokéstop in secluded areas paired with the ironically named 'lure' game item could provide victims for muggings and sexual assaults [15]. Health practitioners began to talk of an emerging pandemic of *Pokémon GO* injuries [80]. At the height of the *Pokémon GO* popularity in the Northern summer and autumn of 2016 [91], it had become firmly linked to law in the semiosphere, both in terms of the illegalities caused by users, and users as victims of crime [85].

However, this linking of *Pokémon GO* with illegality discloses a fundamental legality to the game in the rigidity of its software. At its essence *Pokémon GO* is a simple game with limited game play. Indeed, critics have been less than favourable concerning *Pokémon GO* as a gaming experience [63]. In the game, a Pokémon, Pokéstop or Gym is identified near the user's GPS location. The user then taps the relevant icon that leads to a screen that allows interaction with the Pokémon (opening the capturing screen that allows the Pokémon to be sedated and caught using Pokéballs), Pokéstop (swiping the Pokéstop icon to unlock loot) or Gym (opening the Gym battle screen allowing a user to attempt to capture the Gym). The other features of the game are the icons that show the users inventory and Pokédex. However, notwithstanding the simplicity of the game, its code has been less than stable. Almost immediately after release Niantic infuriated users with the failure of the 'three step' tracking feature that allowed users to identify their relative proximity to spawned Pokémon. This feature crashed and froze and then was deleted from the game [97]. Further, the game quickly became notorious for its server outages and the high rates of its upgrade/patch cycle [67: 5].

These failures showed that at the level of code, *Pokémon GO*'s architecture was rigid and non-resilient; the limited functions of the design was unable to cope with the volume of users and more complex real-time input-output functions like the 'three step' feature. In a digital world where slogans such as 'code is law' [51: 5] have become a truism, in jurisprudential terms the code was narrow, rigid and over prescriptive. The illegalities associated with users of the game were a direct consequence of the over-legality of the code itself.

This illegality-legality complex of *Pokémon GO* as a digital-physical hybrid is revealed directly in the controversy around third party apps and in user GPS spoofing. In game terms these were cheats. The failure and removal of the 'three step' function by Niantic led to numerous apps developed by third-parties that were able to predict and locate spawning Pokémon. Rather than collaborate with these providers to fix the 'three step' function, Niantic engaged in a campaign of having these banned and disabled for violating Niantic's terms of service [69, 31: 40]. In this example Niantic used law and lawful actions available to it in the physical world of agreements and intellectual property to shut down in-game cheating by users. The GPS hacking cheat emerged in relation to the Gym function of the game. The Gym feature has been criticised as highly unfair because shortly after *Pokémon*

GO's release, all the Gyms were occupied by high level users with their rare and powerful Pokémon such as Snorlax and Dragonite³ excluding casual users or users new to the game from being in a position to fully experience the Gym battle aspect of gameplay [96, 98]. It became clear that many of the high level users had used GPS location spoofing that allowed rapid, inhuman level-upping and the takeover of Gyms in various and remote locations, sometimes even before *Pokémon GO* had been released in that region [70].

So as seen from these various examples *Pokémon GO* presents a complex intersection with law. It is infamous for causing illegalities to property and person in the physical world; yet these are largely due to the rigid legality of its flawed coding. Niantic relied on its rights under contract and intellectual property laws to shut down third party apps that allowed users to cheat and escape the rigidity of the code in the game. The game captures law in many instances and many forms. Even the code itself manifests concerns with physical legality with the loading screen warnings of 'Do not Pokémon GO and drive!' and to 'Remember to be alert at all times. Stay aware of your surroundings', even if the belated introduction of these warnings was a way for Niantic to limit its liability. Embedded in the exhortations is an appeal to the user in the physical world. The very nature of the game with the map screen avatar that reflects in the game the user's location in the physical world presupposes a subject, a being that sees, moves, catches and accumulates both in the digital and in the physical as a smart device augmented human.

But what sort of law engaged physical-digital being is being projected and played with through *Pokémon GO*? There is clearly subjugation involved, subjugation to the rigidity of Niantic's code and subjugation to laws from the physical world relating to access to property and controlling motor vehicles. What can be seen is the idea of a legal subject. Having glimpsed the actions of the legal subject in this section, the next section goes about catching it.

4 The Neoliberal Legal Subject of Hypercapitalism

This section draws upon a comparison with the classic Nintendo Pokémon games to see and catch the diminished legal subject projected by *Pokémon GO*. In the classic games the player/avatar assemblage participated in a narrative. There was seeing, moving, catching and accumulation, but these basic freedoms were given meaning by competition, quests and journeys. The player could utilise these freedoms for an end, to achieve a goal, to unlock the next chapter of the story. This is a familiar lawful—that is full of law—figure. It is the liberal legal subject. The subject granted rights and freedoms by law through which to craft their own life according to law. However, *Pokémon GO* manifests the neoliberal subject ready-wrought by a digital orientated hypercapitalism. With an absence of narrative the neoliberal legal subject is seen as a monster possessing base freedoms of seeing, moving and accumulating,

³ Although not explained in the game, the higher the user's level, the higher level 'Combat Power' ('CP') Pokémon you are likely to catch or hatch. The higher the combat power of Pokémon, the better to battle in a Gym.

but located in an overdetermined present unable to prudently plan and work towards a better life.

Pokémon GO is a substantially different game from the classic Nintendo Pokémon games. The original Nintendo Game Boy *Pokémon Red* and *Pokémon Blue*, and subsequent generations of Pokémon games are all strategic, role-playing games (RPGs) inspired by creator's Satoshi Tajiri childhood interest in insect collecting [8: 402]. RPG is a genre of game that prioritises narrative participation [18, 52: 515]. In the classic Pokémon games, and a substantially similar narratives exists through the different generations of games, players start the game as the 10 year old character 'Red', leaving his hometown to become a Pokémon Trainer in a fictional region inhabited by Pokémon. After picking a starter Pokémon from Professor Oak, the player/Red assemblage embarks on a game-long rivalry with an non-playing character (NPC) 'Gary' as another beginner Pokémon trainer, begins to battle and catch wild Pokémon, travels to other towns, levels up Pokémon to defeat gym leaders and collect badges, thwarts the evil criminal organisation Team Rocket, and, ultimately, defeats the Elite Four to gain the title of Pokémon Champion. There is a clear main narrative with an end goal in classic Pokémon games that is further enriched by non-linear, optional narratives or side quests that the player can choose to embark on such as helping other NPC in exchange for rewards and levelling up of Pokémon.

While seeing, moving, catching and accumulating were part of the classic game experience these base tasks were located, contextualised and given meaning by the narrative. The player/Red assemblage developed through the game, in the choices made, the battles fought and the side quests embarked on. Similarly the captured Pokémon developed through experience in battles and through training. The player/Red assemblage was free to move within the open world of the game map, free to choose which Pokémon to capture, free to choose which Pokémon to battle and what attacks the Pokémon should do in the turn-based battles. Finally, there was freedom to choose which Pokémon to keep and accumulate and which one to relinquish by donating to Professor Oak. However, these rights and freedoms served utilitarian purposes. The seeing, moving, catching and accumulating in the classic games had a purpose; to unlock the next town, the next competitor, the next part of the story, to progress participation in the narrative.

This does not mean that the classic Pokémon games are a self-directed 'sandbox' for creation like *Minecraft* [74] or life-simulation massive multiplayer online games like *Second Life* [54] where the goal is 'play' that turns unstructured resources into a digital habitus [16]. In the classic games the steps of the narrative are hard coded into the experience. A player was unable to skip or bypass key stages, but was required to sequentially complete specific adventures, quests and battles to progress. For cultural critics the structured narrative of classic Pokémon, the competition in the battles, the taking Pokémon from nature, the proprietorial emphasis on catching and owning Pokémon, suggested that the game was handheld ideology for the post-cold war generation, rendering capitalism inevitable and desirable [2: 46–47, 76, 3: 175]. For the legally orientated cultural critic this ideological function had a jurisprudential tinge. The game showed a liberal legal subject—an entity that had rights and freedoms but submitted to the overarching rules of the game to complete

the narrative. The player/Red assemblage was not—and could not be—an anarchist or Pokémon liberationist, Professor Oak's injunction that 'you can't do that' served as a textual reminder that all forms of unacceptable behaviour from riding a bike indoors to releasing Pokémon back into the wild was not in the code.

In this there was a very Lockean subjectivity programmed into the player/Red assemblage. The catching mechanic animates directly Locke's classic account of labour as the origin of property [55: Sec 27 18]. A Pokémon belonged to a player because the player caught it; reflecting legal authority about the acquiring of ownership in wild animals from *Justinian's Institutes* [45: Bk II, Tit 1 cls 12 163] to Blackstone [12: Ch 25 *389–396 317–322] to the 1805 decision of the New York Supreme Court in *Pierson v Post* [75]. For Locke property, the acquiring of it, the disposing of it and the defending one's title against other's claims provides the resources through which the subject can pursue 'true and solid' happiness [56: Sec 58 209]. It does not seem by chance that the game did not allow the stealing by capturing of another trainers' Pokémon. In classic Pokémon this battle of titles and claims is played out as the player/Red assemblage progresses through the narrative to be Pokémon Champion and win the game. What was precisely emphasised in the classic Pokémon games was that the basic rights of movement, contract and property—the classic liberal rights—were to be exercised: first according to the overarching legality of the game, and second for the purpose of completing the story.

This projects the essential hallmarks of the liberal legal subject. A subject that is full of law; granted rights and freedoms by law, so as to pursue lawful expressions of happiness, the good life or self-actualisation [102: 85–86]. In classic Pokémon seeing, moving, catching and accumulating, progressed participation in the narrative. A continual criticism of liberal thought is that the liberty and freedom granted is not extended to the ends. A subject that chooses to pursue happiness through impinging the freedoms of others—taking property, indecent behaviours, breaking contracts—will find their freedoms restricted. Using liberal freedoms to pursue illiberal ends is impermissible. For the liberal legal subject law provides a structured agency, establishing but also limiting rights and freedoms. Similarly with the classic Pokémon the end of the narrative in finishing the game as Pokémon Champion was fixed, but the player/Red assemblage's journey to this end, which side quests, which battles won or lost, which moves a Pokémon was ordered to do in battle, which Pokémon to be kept and trained, was unique.

It can be seen, therefore, that classic Pokémon games have trained generations of children to be liberal legal subjects thriving in the market. To be 'prudent' with rights and freedoms so as to win battles, accumulate more resources, to progress. The lesson was to play the game, to be entrepreneurial and win. While the ideological orientation was obvious, at the most essential level classic Pokémon affirmed self-narration; that as a being-in-time planning, developing strategy and learning from experience can lead to active agency in crafting a life story.

However, *Pokémon GO*, notwithstanding its borrowing of core concepts, aesthetics and terminology from the classic Nintendo games, does not animate the liberal legal subject and its capitalistic tendencies. Mobile gaming is notorious for simple, reflex and pattern-matching games, like *Angry Birds* [86], *Fruit Ninja*

[35] or *Temple Run* [42], where swipes on the touch screen produce immediate effect in the game [39: 5]. Generally absent from successful, ‘viral’ mobile games are the world-immersion and narrational dimensions of RPGs. Mobile games tend to be for a causal gamer wanting instant, low commitment distraction. The classic Pokémon games were neither instant nor low commitment. Moving around the maps, undertaking quests and the complex turn based battle sequences, took concentration, memory and significant commitments of physical time. *Pokémon GO* is much closer in game experience to viral mobile games than classic Pokémon. Users walk in the physical world, Pokémon spawn, the user catches the Pokémon, the user then keeps the Pokémon or redeems it for candy. All there is seeing, moving, catching and accumulating. There is no underlying narrative or goal beyond the ‘birdwatcher’ impetus to complete the Pokédex or levelling up. Aspiring to complete the Pokédex is overdetermined and unfulfilling. It is overdetermined as all Pokémon are already suggested in the Pokédex by having a numbered entry for an unknown Pokémon and an incomplete entry with a silhouette for seen but not caught Pokémon. It is unfulfilling as it is not possible to complete the Pokédex. Specific Pokémon are region locked meaning they only spawn in specific part of the globe and Niantic keeps releasing upgrades that expand the pool of Pokémon. Further, focusing on ‘levelling up’ is endless. The user progresses up a numerical level, for example from level 8 to level 9, where the achievement is merely the progression up a scale. Achievement of a new level gives an immediate loot package and increases the potential to catch rarer Pokémon. The game makes levelling up exponential with each further level requiring substantially more experience points to progress, seemingly reaching a limit at level 40.

The *Pokémon GO* user is continually stimulated. There is always a Pokémon to catch, a Pokéstop to spin, or a Gym to admire or fruitlessly try to takeover. There is a continual seeing, a seeing on the device’s screen and seeing the referent in the physical world [68]. There is movement. Public health advocates saw in *Pokémon GO* a possible positive in its encouragement of walking [9, 49, 62, 103]. However, *Pokémon GO*, rather appropriately for an augmented reality game, really rewards augmented mobility. Its algorithms, and specifically the region-locked Pokémon, encourage movement over more than pedestrian distances.

This visual transientness of the *Pokémon GO* user reveals a different legal subject than the liberal legal subject of the player/Red assemblage of classic Pokémon. There is no prudence, no strategy to pursue, no narrative of self-development to progress. The basic rights of seeing, moving, catching and accumulating are reactive, immediate and exercised without any notion of an ‘end.’ This is the consumer unit of hypercapitalism; an over stimulated node in the network that impulsively desires, purchases and discards, to desire, purchase and discard again [84, 25: 13–14]. There is no teleology, no narrative of progress, of improving self in the world, which made liberalism seductive. In *Pokémon GO* there is no self-affirming competition in the market or vigorous discourse in the polis. In classic Pokémon the player/Red assemblage talked, battled and traded with NPCs. There was a digital community where social engagement was essential to furthering the narrative [3: 180]. Indeed, a set of norms and mores were reinforced. Kindness and care towards Pokémon, graciousness in winning or losing a battle, following

through on commitments to do certain tasks or quests, generated rewards. The narrative emerged from a social context, seeing, moving, catching and accumulating had meaning because of the game's projection of a society.

However, the consumer unit manifest by the smart device, *Pokémon GO* and user is a monad. There is no sociability either within the game or within a community of *Pokémon GO* users. Pokémon cannot be traded, NPCs do not make requests, norms and mores of social interaction are irrelevant. The user plays the game alone; catching Pokémon, hatching eggs and levelling up are individual, intimate activities between the user and their device. If there is a relationship it is the command and control of the digital [90: 24]. The only relationship disclosed in the intimacy of user and device is that of the master and slave. A user does what Niantic and its absolute code commands, while Niantic monitors and records the telemetric data sent by the user's device. The only other users seen in the game are the occupiers of Gyms; powerful beings with possibly cheat derived stratospheric levels of experience and super rare ultra-powerful Pokémon. These are to be seen and admired, an untouchable caste of privilege and power. Even in the fruitless battles—an incoherent wobble-fest of random finger stabs and swipes on the screen—there is not an actual user controlling the Gym defending Pokémon. Rather Niantic has a bot automating the Gym defence, despite the available technology in mobile devices for user to user interaction. The hallmark of the classic Pokémon games was their ability to interact with both NPCs and other game users through the Gameboy Game Link Cable. *Pokémon GO*'s digital space is a more simplified world than liberalism's securing of liberty through contract and property. Indeed, in its hierarchy and allotted roles it suggests feudalism [19]. This suggestion of feudalism in *Pokémon GO* is a pictogram of hypercapitalism's feudalist structure—Niantic representing the global elite occupying the command and control nodes, the Gym occupying users the small caste of outrageously affluent acolytes and the everyday *Pokémon GO* user the subservient globalised mass of frantic, totally surveilled consumer-producers [43: 56]. Additionally, in the classic Pokémon games, there was a quaint exploration and adventure element to catching Pokémon which could only be found in tall grass beyond each town or city's borders. In comparison, Pokémon are in high concentration in heavily populated areas in *Pokémon GO* while rural areas are largely devoid of the game's interactive icons. This reflects a concentration of accumulation within hypercapitalist commercial spheres which removes the human experience of enjoyment in nature and exploration found in the classic games. The ability to catch and accumulate Pokémon or level up in *Pokémon GO* is therefore dictated by where a user lives, works or is able to travel to, creating a further divide between the classes of users.

Pokémon GO in projecting the feudalist structure of hypercapitalism reveals the neoliberal legal subject. The neoliberal legal subject is a parody of the liberal legal subject [13: 87]. Where the rights and freedoms of the liberal legal subject allowed agency to plan and participate in a lawful life-story, the neoliberal legal subject has been stripped of this prudence. The requirement to see, move, catch and accumulate has become disconnected from ends. The neoliberal legal subject that is manifest in *Pokémon GO* is without community and context; a lonely avatar moving through an abstracted map. Purposefulness is replaced by impulsive reaction to algebraic-

generated stimulus within a total surveillance context. This is not a legal subject that is a free agent capable of forming legal relations. It is a digital peasant receiving and transmitting data within a network. Although it moves, it is always known, located and expected to perform routine and repetitive tasks for immediate superficial gratification [90: 48] through catching another Pokémon, retrieving loot from another Pokéstop, gaining experience points, levelling up and upgrading a Pokémon.

The only real value suggested by *Pokémon GO* is accumulation.⁴ This is manifest in-game by the way Pokémon are treated. In classic Pokémon the player/Red assemblage was limited to hold six Pokémon at any one time during their travels and in the catching and training them, would develop a sense of care towards their Pokémon. Team Rocket was demarked as ‘bad’ through their mistreatment of Pokémon. There was ambiguity in the classic game on whether Pokémon were property or persons sufficient to allow critics to argue that this interrupted some of the capitalist message through suggesting a distinctly Japanese orientation towards things [1, 23: 193] or even an ecological counterpoint [8, 71: 337]. In *Pokémon GO* Pokémon are just packages of data tradeable for candy that can be ‘fed’ to the same type of Pokémon to upgrade it. This perverse activity suggests, not care or ecological awareness, but the cannibalistic practices of the mass-industrialised farming factories of hypercapitalism where carcasses and animal by-product are feed back to the livestock [88]. All there is are commensurable resources to be accumulated and consumed for immediate gain. It suggests that the neo-liberal subject, nor the hypercapitalist world it inhabits, has intrinsic value, or rights, but is a changeable commodity, a unit that can be replaced, upgraded or redeemed [81: 16].

In this unrelenting accumulation, consumption and unregulated capital in the form of candy, time for the *Pokémon GO* user is compressed. In the classic Pokémon there was a clear progression of time in-game and the existence of the save game feature allowed a player to ‘go back in time’ to an earlier point in their game. Thomas Hobbes makes it particularly clear that the faculty of prudence is a feature of time, a considering in the present of past experiences so as to plan for the future [40: 12–13]. In *Pokémon GO* there is no past. No save file to reload, no mnemonic aids to help remember earlier activities. Further there is no future; no end of the game, or quest or narrative to plan and strategize towards. All there is an inflated present; a present of immediate stimulation, impulsive responses and real-time data tracking. Where the liberal legal subject remembered the past so as to move, contact and accumulate towards a desirable future in the present, *Pokémon GO* suggests the neoliberal legal subject exists in an endless present.

In summary what is caught by *Pokémon GO* is the fate of the legal subject within hypercapitalism. This is a digital subject beholden to code, locked into a global system of meaningless movement and accumulation; a data peasant with no future

⁴ Dorward et al. have argued that *Pokémon Go* has the potential to provide for future conservation or nature appreciation augmented reality game. However, in doing so they focus on the possibilities from the game’s architecture rather than anything specific to the game play. Indeed, they acknowledge the significant anti-environmental in-game messages and the anti-social aspects of users in the physical world [21].

and no past, just an immediate, frenzied present involving automated simulation and impulsive responses. The basic rights of liberalism have become uncoupled from the idea of self-development or narration. The capacity to be prudent, to plan, strategies and seek out ends, has been deprogrammed. Seeing, moving, catching and accumulating have become not freedoms but meaningless compulsions within a formless world of commensurable data. Ultimately, *Pokémon GO* reveals a monstrous being; an unlinked digital/physical cyborg seeing, moving, catching and accumulating in a placeless present.

5 Conclusion

This article has argued that *Pokémon GO* reveals the fate of the legal subject. It shows the transformations from the rights-holding, prudent liberal legal subject who can plan and work towards a better life to the monstrous being of digital orientated hypercapitalism. *Pokémon GO* reveals the neoliberal legal subject where seeing, moving, catching and accumulating is disconnected from planning and working towards a better future. This argument was in three sections. The first section introduced visual jurisprudence's limited engagement with software and games and concluded by setting out the essential features of *Pokémon GO* in seeing, movement, catching and accumulation. The second section unravelled *Pokémon GO*'s engagement with legality and illegality concluding a need to focus on the subject of law. The third section catches two forms of the legal subject. As a RPG, classic Pokémon manifested the liberal legal subject as an entity with rights and freedoms able to prudently plan to better their life. However, *Pokémon GO* reveals an alternative legal subject—the neoliberal subject of hypercapitalism—a monster possessing base freedoms of seeing, moving and accumulating, but located in an overdetermined present of stimulus and response, unable to plan and work towards a better life.

References

1. Allison, Anne. 2003. Portable monsters and commodity cuteness; Pokémon as Japan's new global power. *Postcolonial Studies* 6 (3): 381–398.
2. Allison, Anne. 2004. Cuteness as Japan's millennial product. In *Pikachu's global adventure: The rise and fall of Pokémon*, ed. Joseph Tobin, 34–49. Durham: Duke University Press.
3. Allison, Anne. 2006. *Millennial monsters: Japanese Toys and the global imagination*. Berkeley: University of California Press.
4. Atlus. 2008. *Shin Megami Tensei: Persona 4*. Japan: Atlus.
5. Atlus. 2012. *Shin Megami Tensei: Persona 4 Golden*. Japan: Atlus.
6. Ayers, John W., Eric C. Leas, Mark Dredze, Jon-Patrick Allem, Jurek G. Grabowski, and Linda Hill. 2016. Pokémon GO—A new distraction for drivers and pedestrians. *JAMA Internal Medicine* 176 (12): 1865–1866.
7. Bainbridge, Jason. 2014. "Gotta catch 'em all!" Pokémon, cultural practice and object networks. *The IAFOR Journal of Asian Studies* 1 (1): 1–15.
8. Bainbridge, Jason. 2014. 'It is a Pokémon world': The Pokémon franchise and the environment. *International Journal of Cultural Studies* 17 (4): 399–414.

9. Barkley, Jacob E., Andrew Lepp, and Ellen L. Glickman. 2017. "Pokémon Go!" may promote walking, discourage sedentary behavior in college students. *Games for Health Journal* 6 (3): 165–170.
10. Barnett, Michael, and Cassandra Sharp. 2015. The moral choice of inFAMOUS: Law and morality in video games. *Griffith Law Review* 24 (3): 482–499.
11. Barrett, Alison, and Jillian Barrett. 2016. *The Sydney Morning Herald*. Pokémon Go: Don't break the law to play. <http://www.smh.com.au/comment/sisters-in-law/pokmon-go-dont-break-the-law-to-play-20160722-gqbitd.html>. Accessed 12 July 2017.
12. Blackstone, William. 1765–1769/2001 *Blackstone's commentaries on the laws of England*. London: Cavendish Publishing.
13. Blalock, Corinne. 2014. Neoliberalism and the crisis of legal theory. *Law and Contemporary Problems* 77 (4): 71–103.
14. Buckingham, David, and Julian Sefton-Green. 2003. Gotta catch'em all: Structure, agency and pedagogy in children's media culture. *Media, Culture and Society* 25 (3): 379–399.
15. Butt, Craig, and Marissa Calligeros. 2016. The Age. Driver playing Pokemon Go crashes into St Francis Xavier College in Berwick. <http://www.theage.com.au/victoria/driver-playing-pokemon-go-crashes-into-xavier-college-in-berwick-20160728-gqg9ae.html>. Accessed 12 July 2017.
16. Castronova, Edward. 2004. The right to play. *New York Law School Law Review* 49: 185–210.
17. Chan, Dean. 2008. Convergence, connectivity, and the case of Japanese mobile gaming. *Games and Culture* 3 (1): 13–25.
18. Consalvo, Mia. 2003. Zelda 64 and video game fans: A walkthrough of games, intertextuality, and narrative. *Television & New Media* 4 (3): 321–334.
19. Davidson, Andrew P., and Bligh Grant. 2001. Rural Australia: Neo-liberalism or a "new feudalism"? *Journal of Contemporary Asia* 31 (3): 289–305.
20. Davies, Katie. 2016. Daily Mail Australia. Is this the World's most dangerous game? fears new Pokemon Go app craze could be used by pedophiles to lure unsuspecting young players. <http://www.dailymail.co.uk/news/article-3684465/Is-world-s-dangerous-game-Fears-new-Pokemon-app-craze-used-pedophiles-lure-unsuspecting-young-players.html>. Accessed 12 July 2017.
21. Dorward, Leejiah J., John C. Mittermeier, Chris Sandbrook, and Fiona Spooner. 2017. Pokémon Go: Benefits, costs, and lessons for the conservation movement. *Conservation Letters* 10 (1): 160–165.
22. Douglas, Michael. 2016. The Conversation. Pokémon Go puts pressure on when technology meets the law. <http://theconversation.com/pokemon-go-puts-pressure-on-when-technology-meets-the-law-62489>. Accessed 12 July 2017.
23. Doyle, Kylie, and Kieran Tranter. 2017. F#CK YOUR FAMILY!: The visual jurisprudence of automobility. *International Journal for the Semiotics of Law* 30 (1): 1–22.
24. Egenfeldt-Nielsen, Simon, Jonas Heide Smith, and Susana Pajares Tosca. 2008. *Understanding video games: The essential introduction*. New York: Routledge.
25. Featherstone, Mike. 2007. *Consumer culture and postmodernism*, 2nd ed. London: Sage.
26. Framke, Caroline. 2016. Vox. Pokémon Go in the holocaust museum or ground zero: Nintendo has no fix yet. <https://www.vox.com/2016/7/13/12161974/pokemon-go-holocaust-museum-remove-pokestop>. Accessed 12 July 2017.
27. Game Freak. 1996. *Pokémon blue*. Japan: Nintendo.
28. Game Freak. 1996. *Pokémon red*. Japan: Nintendo.
29. Game Freak. 2016. *Pokémon Moon*. Japan: The Pokémon Company.
30. Game Freak. 2016. *Pokémon Sun*. Japan: The Pokémon Company.
31. Goggin, Gerard. 2017. Locating mobile media audiences: In plain view with Pokémon Go. In *Studying digital media audiences: Perspectives from Australasia*, ed. Craig Hight, and Ramaswami Harindranath, 39–58. New York: Routledge.
32. Goodman, Rick, and Jordanna Schriever. 2016. The Adelaide Advertiser. Pokémon GO players assaulted, robbed at adelaide beach. <http://www.adelaidenow.com.au/news/the-pulse-adelaides-live-news-weather-and-traffic-blog/news-story/4ee91d3cde604a5c60385137ae9b980c>. Accessed 12 July 2017.
33. Goodrich, Peter. 2013. *Legal emblems and the art of law: Obiter depicta as the vision of government*. Cambridge: Cambridge University Press.
34. Goodrich, Peter. 2013. Visiocracy: On the futures of the fingerpost. *Critical Inquiry* 39 (3): 498–531.
35. Halfbrick. 2010. *Fruit Ninja*. Australia: Halfbrick.

36. Hanke, John, and Niantic Team. Niantic labs blog: Break out the sneakers and Poké balls! <https://www.nianticlabs.com/blog/launch/>. Accessed 10 June 2017.
37. Hanke, John, and Niantic team. Niantic labs blog: Goodbye summer, hello fall!. <https://www.nianticlabs.com/blog/autumn/>. Accessed 10 June 2017.
38. Heath, Alex. Business Insider Australia. 2016. A new bill called 'Pidgey's Law' aims to force the removal of pokéstops in 'Pokémon Go'. <https://www.businessinsider.com.au/pidgeys-law-bill-aims-to-force-removal-of-pokestops-in-pokemon-go-2016-8?r=US&IR=T>. Accessed 12 July 2017.
39. Hjorth, Larissa, and Ingrid Richardson. 2017. Pokémon GO: Mobile media play, place-making, and the digital wayfarer. *Mobile Media & Communication* 5 (1): 3–14.
40. Hobbes, Thomas. 1651/2008. *Leviathan*. New York: Pearson Longman.
41. Horton, John. 2012. 'Got my Shoes, Got my Pokémon': Everyday geographies of children's popular culture. *Geoforum* 43 (1): 4–13.
42. Imangi Studios. 2011. *Temple Run*. United States: Imangi Studios.
43. Jin, Dal Yong. 2017. Critical interpretation of the Pokémon GO phenomenon: The intensification of new capitalism and free labor. *Mobile Media & Communication* 5 (1): 55–58.
44. Joseph, Bellal, and David G. Armstrong. 2016. Potential perils of peri-pokémon perambulation: The dark reality of augmented reality? *Oxford Medical Case Reports*. doi:10.1093/omcr/omw080.
45. Justinian. 1876. *The Institutes of Justinian*. Trans. Thomas Collett Sandars. 5th ed. Chicago: Callaghan and Company.
46. Keogh, Brendan. 2017. Pokémon Go, the novelty of nostalgia, and the ubiquity of the smartphone. *Mobile Media & Communication* 5 (1): 38–41.
47. Kirriemuir, John. 2006. A history of digital games. In *Understanding digital games*, ed. Jason Rutter, and Jo Bryce, 21–35. London: Sage.
48. Kooiman, Brian J., and Dwayne P. Sheehan. 2015. Interacting with the past, present, and future of exergames: At the beginning of a new life cycle of video games? *Loisir et Société/Society and Leisure* 38 (1): 55–73.
49. LeBlanc, Allana G., and Jean-Philippe Chaput. 2016. Pokémon Go: A game changer for the physical inactivity crisis? *Preventive Medicine*. doi:10.1016/j.ypmed.2016.11.012.
50. Leschock, Marcus. 2016. WGNtv. man's home mistakenly set as Pokémon GO gym. <http://wgntv.com/2016/07/11/mans-home-mistakenly-set-as-pokemon-go-gym/>. Accessed 12 July 2017.
51. Lessig, Lawrence. 2006. *Code 2.0*. New York: Basic Books.
52. Lewis, Melissa L., René Weber, and Nicholas David Bowman. 2008. "They may be pixels, but they're my pixels:" Developing a metric of character attachment in role-playing video games. *CyberPsychology & Behavior* 11 (4): 515–518.
53. Li, Tiffany. 2016. Pokémon Go and the law: privacy, intellectual property, and other legal concerns. Freedom to tinker: Research and expert commentary on digital technologies in public life. <https://freedom-to-tinker.com/2016/07/19/pokemon-go-and-the-law-privacy-intellectual-property-and-other-legal-concerns/>. Accessed 12 July 2017.
54. Lab, Linden. 2003. *Second life*. United States: Linden Lab.
55. Locke, John. 1690/1982. *Second treatise of government: An essay concerning the true original, extent and end of civil government*. Wheeling, Illinois: Harlan Davidson.
56. Locke, John. 1690/2001. *An essay concerning human understanding*. Kitchener: Batoche Books.
57. Lui, Donald P.Y., Grace P.Y. Szeto, and Alice Y.M. Jones. 2011. The pattern of electronic game use and related bodily discomfort in Hong Kong Primary school children. *Computers & Education* 57 (2): 1665–1674.
58. Marusek, Sarah. 2005. "Wheelchair as semiotic: Space governance of the American handicapped parking space. *Law Text Culture* 9: 178–188.
59. Marusek, Sarah. 2007. Between disability and terror: Handicapped parking space and homeland security at fenway park. *International Journal for the Semiotics of Law* 20 (3): 251–261.
60. Marusek, Sarah. 2014. Visual jurisprudence of the American yellow traffic light. *International Journal for the Semiotics of Law* 27 (1): 183–191.
61. Mäyrä, Frans. 2017. Pokémon GO: Entering the ludic society. *Mobile Media & Communication* 5 (1): 47–50.
62. Meschtscherjakov, Alexander, Sandra Trösterer, Artur Lupp, and Manfred Tscheligi. 2017. Pokémon WALK: Persuasive effects of Pokémon GO game-design elements. In *International Conference on Persuasive Technology*. Berlin: Springer.
63. Metacritic. 2016. Pokémon GO. <http://www.metacritic.com/game/ios/pokemon-go>. Accessed 12 June 2017.

64. Moser, Cassidee. 2016. IGN Australia. Is Pokemon GO even legal?. <http://in.ign.com/pokemon-go/98069/feature/is-pokemon-go-even-legal>. <http://in.ign.com/pokemon-go/98069/feature/is-pokemon-go-even-legal>. Accessed 12 July 2017.
65. Niantic. 2013. *Ingress*. United States: Niantic.
66. Niantic. 2016. *Pokémon GO*. United States: Niantic.
67. Oh, Yoonsin, Gracia R. Clark, and Allison C. Brunett. 2017. Pokémon Go players' perceptions on twitter. *International Journal of Humanities and Social Sciences* 9 (1): 1–8.
68. Oleksy, Tomasz, and Anna Wnuk. 2017. Catch them all and increase your place attachment! the role of location-based augmented reality games in changing people-place relations. *Computers in Human Behavior* 76: 3–8.
69. Owen, Phil. 2016. The Wrap. The backlash against 'Pokemon GO' has begun, as pokevision and other trackers shut down. <http://www.thewrap.com/backlash-pokemon-go-pokevision-and-other-trackers-shut-down/>. Accessed 12 July 2017.
70. Passary, Sumit. 2016. Tech times. Pokémon GO cheaters will be banned: No GPS spoofing or other cheats tolerated. <http://www.techtimes.com/articles/170196/20160716/pok%C3%A9mon-go-cheaters-will-be-banned-no-gps-spoofing-or-other-cheats-tolerated.htm>. Accessed 12 July 2017.
71. Patten, Fred. 2004. *Watching anime, reading manga: 25 years of essays and reviews*. Berkely: Stone Bridge Press.
72. Pearson, Ashely. 2017. The legal persona of the video game: The self of Persona 4. *Law, Culture and the Humanities*. doi:10.1007/s11196-016-9497-2.
73. Pearson, Ashley, and Kieran Tranter. 2015. Code, nintendo's super mario and digital legality. *International Journal for the Semiotics of Law* 28 (4): 825–842.
74. Persson, Markus. 2009. *Minecraft*. Sweden: Mojang.
75. Pierson v Post. 1805 3 Cai R 3 175.
76. Pizzato, Mark. 2009. Pokémon as theater: Training the pocket monsters of self and consumerism. In *The japanification of children's popular culture: From godzilla to miyazaki*, ed. Mark I West, 73–84. Lanham: The Scarecrow Press.
77. Pokemania V Globophobia. *Economist*. 20 November 1999. <http://www.economist.com/node/260091>. Accessed 12 July 2017.
78. Pokémon 2016. <http://www.pokemongo.com/en-us/pokemon/>. Accessed 12 July 2017.
79. Pokémon GO: Homepage. 2016. <http://www.pokemongo.com/en-au/>. Accessed 17 Oct 2016.
80. Pourmand, Ali, Kevin Lombardi, Evan Kuhl, and Francis O'Connell. 2017. Videogame-related illness and injury: A review of the literature and predictions for Pokémon Go! *Games for Health Journal* 6 (1): 9–18.
81. Purcell, William J. 2016. The death drive, zombies, and zombie capitalism. *International Journal of Žižek Studies* 10 (3): 1–14.
82. Reddit. 2016. Pokemon GO. <https://www.reddit.com/r/pokemongo/>. Accessed 12 July 2017.
83. Reddit. 2016. The silph road. <https://www.reddit.com/r/TheSilphRoad/>. Accessed 12 July 2017.
84. Rifkin, Jeremy. 2001. *The age of access: The new culture of hypercapitalism*. New York: Penguin.
85. Rossow, Andrew L. 2017. Gotta Catch a Lawsuit: A legal insight into the intellectual, civil, and criminal battlefield Pokemon Go has downloaded onto smartphones and properties around the world. *John Marshall Review of Intellectual Property Law* 16 (3): 329–349.
86. Entertainment, Rovio. 2009. *Angry Birds*. Finland: Chillingo.
87. Ryan, Georja. 2016. The Queensland Times. Why police had to issue warning to 'Pokémon trainers'. <https://m.qt.com.au/news/why-police-had-issue-warning-pokemon-trainers/3057926/>. Accessed 12 July 2017.
88. Seguin, Eve. 2003. The BSE saga: A cannibalistic tale. *Science as Culture* 12 (1): 3–22.
89. Serino, Maeve, Kyla Cordrey, Laura McLaughlin, and Ruth L. Milanaik. 2016. Pokémon Go and augmented virtual reality games: A cautionary commentary for parents and pediatricians. *Current Opinion in Pediatrics* 28 (5): 673–677.
90. Sherwin, Richard K. 2011. *Visualizing law in the age of the digital baroque*. London: Routledge.
91. Siegal, Jacob. 2017. Four out of five 'Pokemon Go' users have quit. <http://bgr.com/2017/04/03/pokemon-go-popularity-2016-users/>. Accessed 20 June 2017.
92. Skyes, Robbie. 2017. 'Those chosen by the planet': *Final fantasy VII* and earth jurisprudence. *International Journal for the Semiotics of Law*. doi:10.1007/s11196-016-9497-2.
93. Sleep, Lyndal, and Kieran Tranter. 2017. The visiocracy of the social security mobile app in Australia. *International Journal for the Semiotics of Law*. doi:10.1007/s11196-016-9498-1.
94. Square. 1997. *Final fantasy VII*. Japan: Square.

95. Sucker Punch Productions. 2009. *InFAMOUS*. United States: Sony Interactive Entertainment.
96. Tassi, Paul. 2016. Forbes. Can 'Pokémon GO' ever fix its team instinct problem?. <https://www.forbes.com/sites/insertcoin/2016/10/12/can-pokemon-go-ever-fix-its-team-instinct-problem/#4cbe79041c34>. Accessed 12 July 2017.
97. Thier, Dave. 2016. Forbes. Don't expect tracking in 'Pokémon GO' anytime soon. <https://www.forbes.com/sites/davidthier/2016/10/14/nearby-dont-expect-tracking-in-pokemon-go-anytime-soon/#453f7e0c7d3c>. Accessed 12 July 2017.
98. Thier, Dave. 2016. Forbes. Gyms and fighting have a problem in 'Pokémon GO'. <https://www.forbes.com/sites/davidthier/2016/07/13/battling-cp-gyms-and-fighting-have-a-problem-in-pokemon-go/#5cc122bf70bb>. Accessed 12 July 2017.
99. Tranter, Kieran. 2012. "Come a day there won't be room for naughty men like us to slip about at all": the multi-medium outlaws of *serenity* and the possibilities of post-literate justice. *Law Text Culture* 16: 277–304.
100. Vincent, Alice. 2016. The Telegraph. Can Playing Pokemon Go Get You Arrested? We Ask a Lawyer. <http://www.telegraph.co.uk/gaming/what-to-play/pokemon-gos-imminent-legal-nightmare-trespassing-harassment-and/>. Accessed 12 July 2017.
101. Wagner, Anne. 2006. The Rules of the Road, A Universal Visual Semiotics. *International Journal for the Semiotics of Law* 19 (3): 311–324.
102. Waldron, Jeremy. 1989. The rule of law in contemporary liberal theory. *Ratio Juris* 2 (1): 79–96.
103. Williamson, Jon W. 2016. Will the 'Pokémon' be heroes in the battle against physical inactivity. *Sports Medicine Open Journal* 2 (1): 13–14.
104. Yano, Christine R. 2004. Panic attacks: Anti-Pokémon voice in global markets. In *Pikachu's global adventure: The rise and fall of Pokémon*, ed. Joseph Tobin, 108–138. Durham: Duke University Press.