In 2003, Washington State enacted a statute banning the sale or rental to minors of video games[REF] containing 'aggressive conflict in which the player kill, injures, or otherwise causes physical harm to a human form in the game who is depicted by dress or other recognizable symbols as a public law enforcement officer.' In 2004, this statute was subsequently declared an unconstitutional violation of the first amendment right to free speech in the Federal District Court case of Video Software Dealers Ass'n v. Maleng [REF