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13 PEOPLE OF THE STATE OF CALIFORNIA, acting by
and through San Francisco City Attorney DAVID CHIU
14

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 COUNTY OF SAN FRANCISCO

17 UNLIMITED JURISDICTION

18 PEOPLE OF THE STATE OF CALIFORNIA,
19 acting by and through San Francisco City
Attorney DAVID CHIU,

20 Plaintiff,

21 vs.

22 SOL ECOM, INC., BRIVER LLC, ITAI
23 TECH LTD., DEFIREX OÜ, CODEBIONIC
24 LABS OÜ, AUGUSTIN GRIBINETS,
ARTEM ASHIRBEKOV, BAKHADYR
25 ASHIRBEKOV, RICHARD TANG,
GAOFAN (SIMON) XU, and DOES #1
through #50,

26 Defendants.
27

Case No. CGC-24-617237

**SECOND AMENDED COMPLAINT FOR
INJUNCTIVE RELIEF AND CIVIL
PENALTIES FOR VIOLATIONS OF
BUSINESS AND PROFESSIONS CODE
SECTION 17200**

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

03/10/2025
Clerk of the Court
BY: ERNALYN BURA
Deputy Clerk

1 Plaintiff, the People of the State of California (the “People”), acting by and through San
2 Francisco City Attorney David Chiu, brings this action against Sol Ecom, Inc., Briver LLC, Itai Tech
3 Ltd., Defirex OÜ, CodeBionic Labs OÜ, Augustin Gribinets, Artem Ashirbekov, Bakhadyr
4 Ashirbekov, Richard Tang, Gaofan Xu (aka Simon Xu), and Does #1 through #50 (together, the
5 “Defendants”), and alleges as follows:

6 INTRODUCTION

7 1. Rapid advancements in the field of artificial intelligence (“AI”) in recent years have
8 created immense opportunities for innovation, with major implications for scientific research,
9 healthcare, education, computing, and beyond.

10 2. Among the most significant developments is the emergence of generative AI models
11 that have the capacity to create content, be it in the form of text, speech, images, video, or music.

12 3. Despite the potential for generative AI models to improve people’s lives, they also
13 present new and profound safety and privacy concerns. In particular, some generative AI models have
14 been released to the public as open source with the goal of fostering innovation and collaboration, but
15 have been adapted and misused for illegal and harmful purposes.

16 4. One disturbing form of misuse is the adaptation of open-source AI image generation
17 models to create fake pornographic and sexual abuse content depicting real, identifiable women and
18 girls, so-called “deepfake pornography” or “deepnudes.”

19 5. These models have led to the proliferation of websites and apps that offer to “undress”
20 or “nudify” women and girls. By exploiting open-source AI image generation models, these websites
21 and apps manipulate images of real women and girls without their consent to create photorealistic
22 images showing these women and girls with AI-generated nude bodies and intimate body parts.

23 6. Defendants operate some of the world’s most popular websites that offer to nudify
24 images of women and girls. The primary purpose of Defendants’ websites is to create fake, nude
25 images of women and girls without their consent. Defendants tout their ability to let users “see anyone
26 naked.” As one Defendant puts it: “[i]magine wasting time taking her out on dates, when you can just
27 use [the website] to get her nudes.” Collectively, these websites have been visited hundreds of
28 millions of times in the last year alone.

1 7. Nonconsensual intimate images (“NCII”) generated from Defendants’ websites—and
2 other similar websites—are used to bully, threaten, and humiliate women and girls.¹ In California and
3 across the country, there has been a stark increase in the number of women and girls harassed and
4 victimized by AI-generated NCII, and this distressing trend shows no sign of abating. For example, in
5 February 2024, AI-generated nude images of sixteen eighth-grade students were circulated among
6 students at a California middle school.² Reports of the use of AI-generated NCII to target and bully
7 schoolchildren—primarily girls—in California and across the country abound.³ The Federal Bureau
8 of Investigation has also warned of an uptick in instances of extortion schemes where bad actors use
9 public social media pictures of their victims to create AI-generated nude and sexually explicit images
10 and threaten to release the images if the victims do not pay them.⁴

12 ¹ Coralie Kraft, *Trolls Used Her Face to Make Fake Porn. There Was Nothing She Could Do*,
13 The New York Times Magazine (July 31, 2024), <https://www.nytimes.com/2024/07/31/magazine/sabrina-javellana-florida-politics-ai-porn.html> (archived at <https://perma.cc/5XNQ-22RB>).

14 ² Jon Healey, *Beverly Hills School District Expels 8th Graders Involved In Fake Nude Scandal*,
15 Los Angeles Times (Mar. 7, 2024), <https://www.latimes.com/california/story/2024-03-07/beverly-hills-school-district-expels-8th-graders-involved-in-fake-nude-scandal> (archived at <https://perma.cc/57AT-NMXE>).

16 ³ Howard Blume, *L.A. School District Probes Inappropriate Images Shared at Fairfax High. More AI Abuse?*,
17 Los Angeles Times (Apr. 9, 2024), <https://www.latimes.com/california/story/2024-04-09/student-generated-inappropriate-ai-image-of-girls-at-fairfax-high> (archived at <https://perma.cc/B8CK-68E6>); Bridget Chavez, *No Charges as AI-Generated Nude Pictures of Female Students Circulate Around Issaquah School*,
18 KIRO7.com (Nov. 9, 2023), <https://www.kiro7.com/news/local/no-charges-ai-generated-nude-pictures-female-students-circulate-around-issaquah-school/MCQTOKWRVREPTK3K2IAQWTRR6U/> (archived at <https://perma.cc/84CJ-WQXL>); Hannah Fry, *Laguna Beach High School Investigates ‘Inappropriate’ AI-generated Images of Students*,
19 Los Angeles Times (Apr. 2, 2024), <https://www.latimes.com/california/story/2024-04-02/laguna-beach-high-school-investigating-creation-of-ai-generated-images-of-students> (archived at
20 <https://perma.cc/S4EG-KUY7>); Josh Haskell, *Calabasas Teen Says Classmate Not Disciplined For Sharing Real and Fake Nude Images of Her*,
21 ABC7.com (Mar. 14, 2024), <https://abc7.com/calabasas-high-school-student-accuses-classmate-sharing-real-and-fake-nude-photos/14521422/> (archived at
22 <https://perma.cc/S68X-8V9B>); Anthony Johnson, *Call for Action at Westfield High School After AI Used to Make Fake Pornographic Images of Girls*,
23 ABC7NY.com (Nov. 3, 2023), <https://abc7ny.com/nj-westfield-high-school-artificial-intelligence-pornographic-images/14009286/>
24 (archived at <https://perma.cc/G9XZ-4D3G>); Liz Landers et al., *A 15-year-old’s Prom Picture was Altered into AI-created Nudes*,
25 Scripps News (May 22, 2024), <https://www.scrippsnews.com/politics/disinformation-desk/high-schools-nationwide-are-facing-a-new-problem-ai-generated-nudes> (archived at
26 <https://perma.cc/HSV8-X56K>).

27 ⁴ James Vincent, *Blackmailers are Using Deepfaked Nudes to Bully and Extort Victims, Warns FBI*,
28 The Verge (June 8, 2023), <https://www.theverge.com/2023/6/8/23753605/ai-deepfake-sextortion-nude-blackmail-fbi-warning> (archived at <https://perma.cc/9E4N-DDHX>).

1 14. Defendant Briver LLC (“Briver”) is a corporation organized under the laws of the state
2 of New Mexico with its principal place of business at 530-B Harkle Road, Suite 100, Santa Fe, New
3 Mexico 87505. Briver owns and operates the websites Pornngen.art and Undresser.ai, which produce
4 AI-generated NCII of adults and children.

5 15. Defendant Itai Tech Ltd. (“Itai Tech”) is a corporation organized under the laws of the
6 United Kingdom with its registered office address at 81 Anthony Drive, Norwich, England, United
7 Kingdom, NR3 4EW. Itai Tech owns and operates the websites Undress.app, Undress.love,
8 Undress.cc, Undressapp.site, and Deepnude.photo. The website Undress.cc produces AI-generated
9 NCII of adults. On information and belief, the websites Undress.app, Undress.love, Deepnude.photo,
10 and Undressapp.site produce AI-generated NCII of adults.

11 16. Defendant Defirex OÜ (“Defirex”) is a corporation organized under the laws of Estonia
12 with a registered address at Vesivärava tn 50-301, Kesklinna linnaosa, 10152 Tallinn and a contact
13 address at Väike-Paala tn 2, Lasnamäe linnaosa, 11415 Tallinn. Defirex owns and operates the
14 website Nudify.online. On information and belief, Nudify.online produces AI-generated NCII of
15 adults.

16 17. Defendant CodeBionic Labs OÜ (“CodeBionic Labs”) is a corporation organized under
17 the laws of Estonia with a registered address of Vesivärava tn 50-301, Kesklinna linnaosa, 10152
18 Tallinn and a contact address of Väike-Paala tn 2, Lasnamäe linnaosa, 11415 Tallinn. CodeBionic
19 Labs OÜ owns and operates the website Undressing.io, which produces AI-generated NCII of adults.

20 18. Defendant Augustin Gribinets (“Gribinets”) is a resident of Estonia. Gribinets owns
21 and operates the website Undressai.com, which produces AI-generated NCII of adults and children.

22 19. Defendant Artem Ashirbekov is a resident of Spain.

23 20. Defendant Bakhadyr Ashirbekov is a resident of Spain.

24 21. Artem Ashirbekov and Bakhadyr Ashirbekov (together “Ashirbekov Defendants”) own
25 and operate the websites Pornx.ai and Xnude.ai, which produce AI-generated NCII of adults and
26 children.

27 22. Defendant Richard Tang (“Tang”) is a resident of Illinois. Tang owns and operates the
28 website Deepnude.cc, which produces AI-generated NCII of adults and children.

1 23. Defendant Gaofan Xu (“Xu”) is a resident of China. Gaofan Xu also goes by Simon
2 Xu.

3 24. Xu owns and operates the websites Deep-nude.ai and Ainude.ai, which produce AI-
4 generated NCII of adults and children.

5 25. The People are not aware of the true names and capacities of Defendants sued as Does
6 #1 through #50, inclusive, and therefore sue these Defendants by such fictitious names. Each
7 fictitiously named Defendant is responsible in some manner for the violations of law alleged. The
8 People will seek leave to amend this complaint to allege their true names and capacities when that
9 information is ascertained.

10 26. Whenever this Complaint refers to “Defendants,” such reference shall include Does 1
11 through 50 as well as the named Defendants.

12 27. Whenever this complaint refers to any act of any corporate defendant, such allegation
13 shall be deemed to mean that such corporate defendant did the acts alleged in the complaint through its
14 officers, directors, agents, employees, and/or representatives while they were acting within the actual
15 or ostensible scope of their authority.

16 28. On information and belief, each Defendant owns and operates other websites that
17 produce AI-generated NCII of adults and/or children. The People will seek leave to amend this
18 complaint to identify these additional websites when that information is ascertained.

19 JURISDICTION AND VENUE

20 29. The San Francisco Superior Court has jurisdiction over this action. Upon information
21 and belief, Defendants are engaging in unlawful and unfair business practices in San Francisco, and
22 the San Francisco City Attorney has statutory authority to prosecute this case on behalf of the People.

23 30. Venue is proper in this Court because, upon information and belief, the unlawful
24 conduct occurred in San Francisco and elsewhere in California.

25 FACTUAL ALLEGATIONS

26 I. The Development and Misuse of Open-Source AI Image Generation Models

27 31. Among the most significant recent developments in AI is the advent of highly
28 sophisticated generative AI models. While the specific computing techniques used in these models

1 differ, in general these models are fed vast quantities of data and are trained to detect patterns and
2 generate new content that mimics the information they have ingested.

3 32. Several companies have deployed this technology to develop AI models specifically
4 designed to generate images or edit existing images based on text prompts from users. These models
5 are trained on enormous datasets consisting of hundreds of millions of images and associated text from
6 the Internet, and learn to recognize features of these images and the text descriptions associated with
7 such features.

8 33. Several such models are made available to the public as “open-source” models. With
9 an open-source model, any member of the public can adapt and train a specific implementation of that
10 model on additional images in order to hone (or “fine tune”) its ability to generate specific kinds of
11 content. These models can be modified and adapted by anyone for almost any purpose.
12 Consequently, these open-source models have been adapted and trained to create new fine-tuned
13 versions that are highly effective at generating pornographic content.⁷ Even where the creators of
14 these open-source models subsequently incorporate safeguards into new releases of the model, earlier
15 releases—and fine-tuned versions trained to generate pornographic content—continue to circulate
16 online.

17 34. These highly popular fine-tuned versions generate not only pornographic content
18 involving fictitious AI-generated individuals, but also manipulate images of real people to produce
19 fictional pornographic content that depicts those individuals. The models are able to recognize
20 clothing and body features in an image of a person, and can be further conditioned to manipulate the
21 image to generate a fake, photorealistic image that maintains the person’s face, but replaces their
22 clothed body with a nude body—thus appearing to “undress” the person and display their intimate
23 body parts. These models “undress” or “nudify” not only adults, but also children.

24
25 ⁷ Will Knight, *This Uncensored AI Art Tool Can Generate Fantasies—and Nightmares*, Wired
26 (Sept. 21, 2022), <https://www.wired.com/story/the-joy-and-dread-of-ai-image-generators-without-limits/>
(archived at <https://perma.cc/7MBU-CHRV>); Lydia Morrish, *The Dark Side of Open Source
27 AI Image Generators*, Wired (Mar. 6, 2024), <https://www.wired.com/story/dark-side-open-source-ai-image-generators/>
(archived at <https://perma.cc/CUN9-VHMA>).
28

1 35. These manipulated intimate images are generated without the consent of the persons
2 depicted, resulting in the creation and dissemination of AI-generated NCII of these individuals.

3 36. The availability of these fine-tuned versions designed to create AI-generated NCII has
4 spawned the development of websites dedicated to creating “nudified” images of women and girls.⁸
5 These websites offer user-friendly interfaces for uploading clothed images of real people to generate
6 realistic “nudified” versions of those images. These websites require users to subscribe or pay to
7 generate nude images. Some websites give users a “free trial,” allowing them to create a limited
8 number of free images as a way of enticing them to pay for additional images.

9 **II. Defendants Operate Popular Websites Used to Nudify Images of Women and Girls**

10 37. Defendants operate some of the world’s most popular websites specifically designed to
11 generate and distribute AI-generated NCII of women and girls.

12 **Sol Ecom**

13 38. Sol Ecom owns and operates the website Drawnudes.io.

14 39. Users can access Drawnudes.io by signing in using their Google, Discord, or X
15 accounts.

16 40. The website allows users to “deepnude girl[s] for free” by uploading an image and
17 using the website’s AI technology to “undress” the image. Users are invited to upload a photo with
18 the message: “Have someone to undress?” Sol Ecom provides step-by-step instructions on how to
19 select images that will provide “good” quality nudified results.

20 41. Users can upload an image of a clothed woman to Drawnudes.io, and the site will
21 create a fake nude image of the subject.

22 42. Sol Ecom allows users to generate a limited number of nudified images for free from
23 the Drawnudes.io website, after which users must purchase credits (or “coins”) in order to generate
24 additional images. On information and belief, users can purchase credits from Sol Ecom, or “dealers”
25 affiliated with Sol Ecom, through a variety of mobile and online payments platforms, including Apple
26 Pay, PayPal, Venmo, and Cash App, or using cryptocurrency.

27 _____
28 ⁸ Santiago Lakatos, *A Revealing Picture*, Graphica (Dec. 8, 2023), <https://graphika.com/reports/a-revealing-picture> (archived at <https://perma.cc/5BCN-G4R3>).

1 43. While the Drawnudes.io website purports to require users to obtain consent for the
2 images they use, Sol Ecom in fact accepts any image that a user wants to nudify and does not verify
3 that the depicted individual has consented to the nudification of her image.

4 44. On information and belief, Sol Ecom also owns and operates the website Clothoff.io.

5 45. Sol Ecom promotes Clothoff.io as a website to “undress any photo with deepnude AI
6 for free.” Users are invited to upload a photo with the message: “Have someone to undress?” Sol
7 Ecom provides step-by-step instructions on how to select images that will provide “good” quality
8 nudified results.

9 46. Users can access Clothoff.io by signing in using their Google, Apple, Discord, and X
10 accounts.

11 47. Users can upload an image of a clothed woman to Clothoff.io, and the site will create a
12 fake nude image of the subject.

13 48. Clothoff.io also offers users the option to modify the image into various enumerated
14 “sex pose[s].” On information and belief, users can upload an image of a clothed woman to
15 Clothoff.io and the site will create a fake nude image of the subject in a sexually explicit pose.

16 49. Sol Ecom allows users to generate a limited number of nudified images for free from
17 the Clothoff.io website, after which users must purchase credits in order to generate additional images.
18 Users can also pay for “VIP coins” to unlock certain features, such as the ability to modify clothed
19 images to depict sexually explicit poses. On information and belief, users can purchase credits from
20 Sol Ecom using PayPal, Apple Pay, Cash App, Venmo, Wise, AliPay, and cryptocurrency.

21 50. While the Clothoff.io website purports to require users to obtain consent for the images
22 they use, Sol Ecom in fact accepts any image that a user wants to nudify and does not verify that the
23 depicted individual has consented to the nudification of her image. In fact, Clothoff.io makes clear
24 that it will “undress any photo.”

25 51. On information and belief, Sol Ecom also operates several additional websites that
26 create AI-generated NCII. including Clothoff.net, Clothoff.org, Clothoff.shop, Removeclothes.ai, and
27 Clothoffbot.org. On information and belief, each of these websites allows users to upload images of
28 clothed women and will generate a fake nude image of the subject without the subject’s consent.

1 52. Sol Ecom knows that the primary purpose of each of the websites it operates is to create
2 AI-generated NCII of identifiable women.

3 53. Sol Ecom intentionally creates and distributes to, or otherwise knowingly encourages,
4 enables, and facilitates the creation and distribution of, AI-generated NCII of identifiable women to
5 users with the knowledge that these images will traumatize and cause severe emotional distress to the
6 depicted individuals if disclosed.

7 54. Since the filing of the FAC, each of Sol Ecom's websites appears to no longer be
8 accessible. However, absent the injunctive relief sought through this complaint, Sol Ecom is likely to
9 restart operation of these websites or open other similar websites.

10 **Briver**

11 55. Briver owns and operates the websites Pornngen.art and Undresser.ai.

12 56. Briver promotes Pornngen.art as a tool to "See Anybody Nude for FREE" and claims
13 that its technology "can undress any photo you upload." Briver likewise claims that the Undresser.ai
14 website provides the "Best Undress AI Tool" to "Nudify Anyone in Seconds."

15 57. Users can access Pornngen.art and Undresser.ai by signing in using their Google
16 accounts.

17 58. Users can upload an image of a clothed woman to Pornngen.art and Undresser.ai, and the
18 sites will create fake nude images of the subject.

19 59. Because Briver has failed to deploy available technology to effectively detect images of
20 minors, users can upload an image of a clothed girl under 18 years old to Pornngen.art and Undresser.ai,
21 and the sites will create fake nude images of the subject.

22 60. Briver allows users to generate a limited number of nudified images for free, after
23 which users must purchase credits (or "gems") in order to generate additional images. On information
24 and belief, users can purchase credits from Briver using their credit cards, PayPal, or cryptocurrency.

25 61. While the Pornngen.art and Undresser.ai websites purport to require users to obtain
26 consent for the images they use, Briver in fact accepts any image that a user wants to nudify and does
27 not verify that the depicted individual has consented to the nudification of her image. Indeed, the
28 websites emphasize that they can be used to "see anybody nude" and "nudify anyone."

1 62. Briver knows that the primary purpose of websites like Pornngen.art and Undresser.ai is
2 to create AI-generated NCII of identifiable women and girls.

3 63. Briver intentionally creates and distributes to, or otherwise knowingly encourages,
4 enables, and facilitates the creation and distribution of, nonconsensual nude images of identifiable
5 women and girls to users with the knowledge that these images will traumatize and cause severe
6 emotional distress to the depicted individuals if disclosed.

7 64. Since the filing of the FAC, the undresser.ai website appears to no longer be accessible.
8 However, absent the injunctive relief sought through this complaint, Briver is likely to restart
9 operation of this website or open other similar websites.

10 **Itai Tech**

11 65. Itai Tech owns and operates a number of websites that offer to nudify images of clothed
12 people, including, but not limited to, Undress.app, Undress.love, Undress.cc, Undressapp.site, and
13 Deepnude.photo.

14 66. Itai Tech promotes the Undress.app website as a way to “[s]ee anybody nude for free.”
15 On the Undress.cc website, Itai Tech displays a visual depiction of how the website’s “Deepnude AI”
16 technology nudifies images of a clothed woman, with the tagline “[j]ust upload a picture and get the
17 result.” And Itai Tech touts its ability to “[e]ffortlessly produce authentic undressed AI images” on the
18 Undress.love website. Likewise, Undressapp.site, and Deepnude.photo both advertise their ability to
19 easily convert clothed images into AI-generated nude images.

20 67. Users can access Undress.cc, Undress.app, Undress.love, and Deepnude.photo by
21 signing in using their Google or Discord accounts.

22 68. Users can upload an image of a clothed woman to Undress.cc, and the site will create a
23 fake nude image of the subject.

24 69. Itai Tech allows users to generate a limited number of nudified images on Undress.cc
25 for free, after which users must purchase credits using a subscription plan in order to generate
26 additional images. On information and belief, users can purchase credits from Itai Tech using PayPal
27 or cryptocurrency.

28

1 70. On information and belief, users can upload an image of a clothed woman to
2 Undress.app, Undress.love, Undressapp.site, and Deepnude.photo and the sites will create a fake nude
3 image of the subject.

4 71. Itai Tech allows users to partially “undress” images of clothed women for free on the
5 Undress.app, Undress.love, and Deepnude.photo websites, generating AI-modified versions of these
6 images depicting the women in bikinis or lingerie. In order to generate a nude image, users must
7 purchase credits through a subscription plan. On information and belief, users can purchase credits
8 from Itai Tech using cryptocurrency.

9 72. While Itai Tech purports to require users to obtain consent for the images they use, it in
10 fact accepts any image that a user wants to nudify and does not verify that the depicted individual has
11 consented to the nudification of her image. Indeed, its websites emphasize the ability to see
12 “anybody” and “anyone” naked.

13 73. Itai Tech knows that the primary purpose of websites like Undress.cc, Undress.app,
14 Undress.love, Undressapp.site, and Deepnude.photo is to create AI-generated NCII of identifiable
15 women and girls.

16 74. Itai Tech intentionally creates and distributes to, or otherwise knowingly encourages,
17 enables, and facilitates the creation and distribution of, AI-generated NCII of identifiable women and
18 girls to users with the knowledge that these images will traumatize and cause severe emotional distress
19 to the depicted individuals if disclosed.

20 75. On information and belief, Itai Tech operates other websites that nudify images of
21 women and girls without their consent, and through which Itai Tech intentionally creates and
22 distributes, and aids and abets the creation of, AI-generated NCII that it knows will traumatize and
23 cause severe emotional distress to depicted individuals.

24 **Defirex**

25 76. Defirex owns and operates the website Nudify.online.

26 77. Defirex promotes Nudify.online as a website to “[g]enerate highly-realistic AI nudes in
27 a few clicks.”

1 78. Users can access Nudify.online by signing in using their Google, Discord, or Apple
2 accounts.

3 79. On information and belief, users can upload an image of a clothed woman to
4 Nudify.online, and the site will create a fake nude image of the subject.

5 80. Defirex allows users to partially “undress” images of clothed women for free on the
6 Nudify.online website, generating AI-modified versions of these images depicting women in bikinis or
7 lingerie. In order to generate a nude image, users must purchase credits through a subscription plan.
8 On information and belief, users can purchase credits from Defirex using PayPal, credit or debit cards,
9 or cryptocurrency.

10 81. While the Nudify.online website purports to require users to obtain consent for the
11 images they use, Defirex in fact accepts any image that a user wants to nudify and does not verify that
12 the depicted individual has consented to the nudification of her image.

13 82. Defirex knows that the primary purpose of websites like Nudify.online is to create AI-
14 generated NCII of identifiable women.

15 83. Defirex intentionally creates and distributes to, or otherwise knowingly encourages,
16 enables, and facilitates the creation and distribution of, AI-generated NCII of identifiable women to
17 users with the knowledge that these images will traumatize and cause severe emotional distress to the
18 depicted individuals if disclosed.

19 **CodeBionic Labs**

20 84. CodeBionic Labs owns and operates the website Undressing.io.

21 85. CodeBionic Labs promotes Undressing.io’s “unparalleled precision in generating
22 deepfake nudes,” and claims that the website creates “AI-generated photos that simulate undressing,
23 available for anyone online.”

24 86. Users can access the Undressing.io by signing in using their Google or Discord
25 accounts.

26 87. Users can upload an image of a clothed woman to Undressing.io, and the site will
27 create a fake nude image of the subject.
28

1 88. CodeBionic Labs allows users to generate a blurred nudified image for free. In order to
2 reveal the nudified image or generate additional images, users must purchase credits. On information
3 and belief, users can purchase credits from CodeBionic Labs using PayPal, Apple Pay, Google Pay,
4 credit or debit cards, or cryptocurrency.

5 89. CodeBionic Labs fails to verify that depicted individuals in the images generated by
6 Undressing.io have consented to the nudification of their respective images.

7 90. CodeBionic Labs knows that the primary purpose of websites like Undressing.io is to
8 create AI-generated NCII of identifiable women.

9 91. CodeBionic Labs intentionally creates and distributes to, or otherwise knowingly
10 encourages, enables, and facilitates the creation and distribution of, AI-generated NCII of identifiable
11 women to users with the knowledge that these images will traumatize and cause severe emotional
12 distress to the depicted individuals if disclosed.

13 92. Since the filing of the FAC, the undressing.io website appears to no longer be
14 accessible. However, absent the injunctive relief sought through this complaint, CodeBionic Labs is
15 likely to restart operation of the undressing.io website or open other similar websites.

16 **Gribinets**

17 93. Gribinets owns and operates the website Undressai.com.

18 94. Gribinets claims that Undressai.com will “[u]ndress anyone” and “remove[s] clothes
19 from any photo within seconds.”

20 95. Users can access Undressai.com by signing in using their Google, Discord, or Telegram
21 accounts.

22 96. Users can upload an image of a clothed woman to Undressai.com, and the site will
23 create a fake nude image of the subject.

24 97. Because Gribinets has failed to deploy available technology to detect images of minors,
25 users can upload an image of a clothed girl under 18 years old to Undressai.com, and the site will
26 generate a fake nude image of the subject.

27 98. Gribinets allows users to generate a limited number of nudified images for free, after
28 which users must purchase credits in order to generate additional images. On information and belief,

1 users can purchase credits from Gribinets using credit or debit cards, mobile and online payment
2 services like Cash App or Link, and cryptocurrency.

3 99. While the Undressai.com website purports to require users to obtain consent for the
4 images they use, Gribinets in fact accepts any image that a user wants to nudify and does not verify
5 that the depicted individual has consented to the nudification of her image.

6 100. Gribinets knows that the primary purpose of websites like Undressai.com is to create
7 AI-generated NCII of identifiable women and girls. Indeed, the website specifically promotes its use
8 to generate nonconsensual images, stating “Imagine wasting time taking her out on dates, when you
9 can just use Undress Ai to get her nudes.”

10 101. Gribinets intentionally creates and distributes to, or otherwise knowingly encourages,
11 enables, and facilitates the creation and distribution of, AI-generated NCII of identifiable women and
12 girls to users with the knowledge that these images will traumatize and cause severe emotional distress
13 to the depicted individuals if disclosed.

14 102. Since the filing of the FAC, the undressai.com website appears to no longer be
15 accessible. However, absent the injunctive relief sought through this complaint, Gribinets is likely to
16 restart operation of the undressai.com website or open other similar websites.

17 **Ashirbekov Defendants**

18 103. The Ashirbekov Defendants (Artem Ashirbekov and Bakhadyr Ashirbekov) own and
19 operate the website Pornx.ai.

20 104. The Ashirbekov Defendants advertise Pornx.ai as a website to “create your own AI
21 porn.”

22 105. Users can access Pornx.ai by signing in using their Google accounts.

23 106. Users can upload an image of a clothed woman to Pornx.ai, and the site will create a
24 fake nude image of the subject.

25 107. Because the Ashirbekov Defendants have failed to deploy available technology to
26 detect images of minors, users can upload an image of a clothed girl under 18 years old to Pornx.ai and
27 the site will create a fake nude image of the subject.

28

1 108. The Ashirbekov Defendants allow users to generate a limited number of nudified
2 images for free on Pornx.ai, after which users must purchase credits (or “tokens”) in order to generate
3 additional images. On information and belief, users can purchase credits from the Ashirbekov
4 Defendants using their bank cards or cryptocurrency.

5 109. On or after May 22, 2024, the Ashirbekov Defendants moved the “Undress” feature
6 from Pornx.ai to a new website called Xnude.ai. However, on the Pornx.ai website, they assure users
7 that “everything’s staying the same for you: same functionality, prices, personal area, and features.”
8 The Xnude.ai website claims to be the “ultimate undress tool” that allows users to “[s]ee anyone fully
9 naked in seconds.” It invites users to “[p]ick age, body type, and more for your perfect deepnude.”

10 110. Like Pornx.ai, users can access Xnude.ai by signing in using their Google accounts.

11 111. Users can upload an image of a clothed woman to Xnude.ai, and the site will create a
12 fake nude image of the subject.

13 112. Because the Ashirbekov Defendants have failed to deploy available technology to
14 detect images of minors, users can upload an image of a clothed girl under 18 years old to Xnude.ai
15 and the site will create a fake nude image of the subject.

16 113. The Ashirbekov Defendants allow users to generate a limited number of nudified
17 images for free on Xnude.ai, after which users must purchase credits in order to generate additional
18 images. On information and belief, users can purchase credits from the Ashirbekov Defendants using
19 cryptocurrency.

20 114. While the Pornx.ai and Xnude.ai websites purport to require users to obtain consent for
21 the images they use, the Ashirbekov Defendants in fact accept any image that a user wants to nudyfy
22 and do not verify that the depicted individual has consented to the nudification of her image. In fact,
23 Xnude.ai makes clear that it can be used to “[s]ee anyone fully naked.”

24 115. The Ashirbekov Defendants know that the primary purpose of websites like Pornx.ai
25 and Xnude.ai is to create AI-generated NCII of identifiable women and girls.

26 116. The Ashirbekov Defendants intentionally create and distribute to, or otherwise
27 knowingly encourage, enable, and facilitate the creation and distribution of, AI-generated NCII of
28

1 identifiable women and girls to users with the knowledge that these images will traumatize and cause
2 severe emotional distress to the depicted individuals if disclosed.

3 117. Since the filing of the FAC, the pornx.ai and xnude.ai websites appear to no longer be
4 accessible. However, absent the injunctive relief sought through this complaint, the Ashirbekov
5 Defendants are likely to restart operation of the undressai.com website or open other similar websites.

6 **Tang**

7 118. Tang owns and operates the website Deepnude.cc.

8 119. Tang promotes Deepnude.cc as a tool to “see anyone naked” and claims that the
9 website uses “the most powerful image deepfake AI” to allow users to “[s]ee any girl clothless [sic]
10 with the click of a button.” The website provides users with instructions to select images that will
11 produce high-quality nudified images.

12 120. Users can access Deepnude.cc using their email addresses.

13 121. Users can upload an image of a clothed woman to Deepnude.cc, and the site will create
14 a fake nude image of the subject.

15 122. Because Tang has failed to deploy available technology to detect images of minors,
16 users can upload an image of a clothed girl under 18 years old to Deepnude.cc, and the site will create
17 a fake nude image of the subject.

18 123. Tang allows users to generate a limited number of nudified images for free, after which
19 users must purchase credits in order to generate additional images. On information and belief, users
20 can purchase credits from Tang using cryptocurrency.

21 124. Tang fails to verify that depicted individuals in the images generated by Deepnude.cc
22 have consented to the nudification of their respective images. In fact, Tang promotes the website as a
23 way to see “any girl clothless [sic].”

24 125. Tang knows that the primary purpose of websites like Deepnude.cc is to create AI-
25 generated NCII of identifiable women and girls.

26 126. Tang intentionally creates and distributes to, or otherwise knowingly encourages,
27 enables, and facilitates the creation and distribution of, AI-generated NCII of identifiable women and
28

1 girls to users with the knowledge that these images will traumatize and cause severe emotional distress
2 to the depicted individuals if disclosed.

3 127. Since the filing of the FAC, the deepnude.cc website appears to no longer be accessible.
4 However, absent the injunctive relief sought through this complaint, Tang is likely to restart operation
5 of the deepnude.cc website or open other similar websites.

6 **Xu**

7 128. Xu owns and operates the websites Deep-Nude.ai and Ainude.ai.

8 129. Xu promotes Deep-nude.ai as “the best free AI deepnude nudifier to see anyone
9 naked.” Likewise, he advertises Ainude.ai as a website to “undress any photos,” and invites visitors to
10 “[u]ndress any girl photo or image to AI nudes NOW.” The website’s FAQs further confirm that the
11 site will “remove clothing from a girl’s photo.”

12 130. Users can access Deep-nude.ai and Ainude.ai by signing in using their Google
13 accounts.

14 131. Users can upload an image of a clothed woman to Deep-nude.ai and Ainude.ai, and the
15 sites will create a fake nude image of the subject.

16 132. Because Xu has failed to deploy available technology to detect images of minors, users
17 can upload an image of a clothed girl under 18 years old to Deep-nude.ai and Ainude.ai, and the sites
18 will create a fake nude image of the subject.

19 133. Xu allows users to generate a limited number of nudified images for free, after which
20 users must purchase credits in order to generate additional images. On information and belief, users
21 can purchase credits from Xu using cryptocurrency.

22 134. Xu fails to verify that depicted individuals in the images generated by Deep-nude.ai and
23 Ainude.ai have consented to the nudification of their respective images. In fact, he promotes the
24 websites as a way to “undress any photos” and see “anyone” naked.

25 135. Xu knows that the primary purpose of websites like Deep-nude.ai and Ainude.ai is to
26 create AI-generated NCII of identifiable women and girls.

27 136. Xu intentionally creates and distributes to, or otherwise knowingly encourages, enables,
28 and facilitates the creation and distribution of, AI-generated NCII of identifiable women and girls to

1 users with the knowledge that these images will traumatize and cause severe emotional distress to the
2 depicted individuals if disclosed.

3 137. Since the filing of the FAC, the Deep-nude.ai and Ainude.ai websites appear to no
4 longer be accessible. However, absent the injunctive relief sought through this complaint, Xu is likely
5 to restart operation of these websites or open other similar websites.

6 **CAUSES OF ACTION**

7 **FIRST CAUSE OF ACTION**

8 **VIOLATIONS OF BUSINESS AND PROFESSIONS CODE 17200**

9 **AGAINST ALL DEFENDANTS**

10 138. The People incorporate by reference the allegations contained in each paragraph above,
11 as if those allegations were fully set forth in this cause of action.

12 139. California Business and Professions Code section 17200 prohibits any “unlawful,
13 unfair, or fraudulent business act or practice.”

14 140. Defendants have engaged in and continue to engage in unlawful business acts and
15 practices in violation of section 17200. Such acts and practices include, but are not limited to, the
16 following:

- 17 a. Defendants have violated California Civil Code section 1708.86(b)(1) prohibiting the
18 creation and intentional disclosure of nonconsensual sexually explicit images, or aided
19 and abetted violations of California Civil Code section 1708.86(b)(1) by the acts and
20 practices set forth herein.
- 21 b. Defendants have violated California Civil Code section 1708.85(a) prohibiting the
22 intentional distribution of nonconsensual depictions of intimate body parts, or aided and
23 abetted violations of California Civil Code section 1708.85(a) by their acts and
24 practices set forth herein.
- 25 c. Defendants have violated California Penal Code section 647(j)(4) prohibiting the
26 intentional distribution of nonconsensual depictions of intimate body parts of an
27 identifiable person, or aided and abetted violations of California Penal section 647(j)(4)
28

1 in violation of California Penal Code section 31 by the acts and practices set forth
2 herein.

3 d. Defendants have violated 15 U.S.C. § 6851(b)(1) prohibiting the knowing or reckless
4 disclosure in interstate commerce of intimate visual depictions of identifiable persons,
5 or aided and abetted violations of 15 U.S.C. § 6851(b)(1) by the acts and practices set
6 forth herein.

7 141. Defendants have engaged in and continue to engage in unfair business acts and
8 practices in violation of section 17200. Defendants’ acts and practices of creating nudified images
9 constitute unfair business practices because they offend established public policy, the harm they cause
10 to consumers greatly outweighs any benefits associated with those practices, and they are immoral,
11 unethical, oppressive, unscrupulous and/or substantially injurious to consumers.

12 **SECOND CAUSE OF ACTION**

13 **VIOLATION OF BUSINESS AND PROFESSIONS CODE 17200**

14 **AGAINST DEFENDANTS BRIVER LLC, AUGUSTIN GRIBINETS, ARTEM ASHIRBEKOV,**
15 **BAKHADYR ASHIRBEKOV, RICHARD TANG, AND GAOFAN XU**

16 142. The People incorporate by reference the allegations contained in each paragraph above,
17 as if those allegations were fully set forth in this cause of action.

18 143. California Business and Professions Code section 17200 prohibits any “unlawful,
19 unfair, or fraudulent business act or practice.”

20 144. Defendants Briver LLC, Augustin Gribinets, Artem Ashirbekov, Bakhadyr Ashirbekov,
21 Richard Tang, and Gaofan Xu are engaged in and continue to engage in unlawful business acts and
22 practices in violation of section 17200. Such acts and practices include, but are not limited to, the
23 following:

24 a. Each of the above-named Defendants has violated California Penal Code section
25 311.3(a) prohibiting the knowing development of nonconsensual obscene images of
26 persons under the age of 18 years, or aided and abetted violations of California Penal
27 section 311.3(a) in violation of California Penal Code section 31 by the acts and
28 practices set forth herein.

- 1 b. Each of the above-named Defendants has violated California Penal Code section
2 311.2(a) prohibiting the knowing distribution of obscene images, or aided and abetted
3 violations of California Penal section 311.2(a) in violation of California Penal Code
4 section 31 by the acts and practices set forth herein.
- 5 c. Each of the above-named Defendants has violated California Penal Code section
6 311.2(b) prohibiting the knowing distribution for commercial gain of obscene images
7 depicting persons under the age of 18 years engaged in sexual conduct, or aided and
8 abetted violations of California Penal section 311.2(b) in violation of California Penal
9 Code section 31 by the acts and practices set forth herein.
- 10 d. Each of the above-named Defendants has violated California Penal Code section
11 311.2(c) prohibiting the knowing distribution to adults of images depicting persons
12 under the age of 18 years engaged in sexual conduct, or aided and abetted violations of
13 California Penal section 311.2(c) in violation of California Penal Code section 31 by
14 the acts and practices set forth herein.
- 15 e. Each of the above-named Defendants has violated 18 U.S.C. § 1465 prohibiting the
16 knowing production of any obscene images with the intent to distribute by interactive
17 computer service, or aided and abetted violations of 18 U.S.C. § 1465 in violation of 18
18 U.S.C. § 2(a) by the acts and practices set forth herein.
- 19 f. Each of the above-named Defendants has violated 18 U.S.C. § 1466 prohibiting
20 engaging in the business of distributing, or knowingly producing with intent to
21 distribute, any obscene images by interactive computer service, or aided and abetted
22 violations of 18 U.S.C. § 1466 in violation of 18 U.S.C. § 2(a) by the acts and practices
23 set forth herein.
- 24 g. Each of the above-named Defendants has violated 18 U.S.C. § 1466A(a)(1) prohibiting
25 the knowing distribution of, or production with intent to distribute, obscene depictions
26 of minors engaging in sexually explicit conduct that were produced by computer, or
27 aided and abetted violations of 18 U.S.C. § 1466A(a)(1) in violation of 18 U.S.C. § 2(a)
28 by the acts and practices set forth herein.

- 1 h. Each of the above-named Defendants has violated 18 U.S.C. § 1466A(b)(1) prohibiting
2 the knowing possession of obscene depictions of minors engaging in sexually explicit
3 conduct that were produced by computer, or aided and abetted violations of 18 U.S.C.
4 § 1466A(b)(1) in violation of 18 U.S.C. § 2(a) by the acts and practices set forth herein.
- 5 i. Each of the above-named Defendants has violated 18 U.S.C. § 2252A(a)(1) prohibiting
6 the knowing distribution of any child pornography by computer, or aided and abetted
7 violations of 18 U.S.C. § 2252A(a)(1) in violation of 18 U.S.C. § 2(a) by the acts and
8 practices set forth herein.
- 9 j. Each of the above-named Defendants has violated 18 U.S.C. § 2252A(a)(2) prohibiting
10 the knowing receipt or distribution of any child pornography or materials containing
11 child pornography by computer, or aided and abetted violations of 18 U.S.C.
12 § 2252A(a)(2) in violation of 18 U.S.C. § 2(a) by the acts and practices set forth herein.
- 13 k. Each of the above-named Defendants has violated 18 U.S.C. § 2252A(a)(4)(B)
14 prohibiting the knowing sale of any child pornography by computer, or aided and
15 abetted violations of 18 U.S.C. § 2252A(a)(4)(B) in violation of 18 U.S.C. § 2(a) by the
16 acts and practices set forth herein.
- 17 l. Each of the above-named Defendants has violated 18 U.S.C. § 2252A(5)(B) prohibiting
18 the knowing possession of child pornography that was produced or distributed by
19 computer, or aided and abetted violations of 18 U.S.C. § 2252A(5)(B) in violation of 18
20 U.S.C. § 2(a) by the acts and practices set forth herein.
- 21 m. Each of the above-named Defendants has violated 18 U.S.C. § 2252A(a)(7) prohibiting
22 the knowing production or distribution of any adapted or modified images of child
23 pornography of identifiable minors by computer, or aided and abetted violations of 18
24 U.S.C. § 2252A(a)(7) in violation of 18 U.S.C. § 2(a) by the acts and practices set forth
25 herein.

26 145. Defendants Briver LLC, Augustin Gribinets, Artem Ashirbekov, Bakhadyr Ashirbekov,
27 Richard Tang, and Gaofan Xu are engaged in and continue to engage in unfair business acts and
28 practices in violation of section 17200. Each of the above-named Defendants' acts and practices of

1 creating nudified images of children constitute unfair business practices because they offend
2 established public policy, the harm they cause to consumers greatly outweighs any benefits associated
3 with those practices, and they are immoral, unethical, oppressive, unscrupulous and/or substantially
4 injurious to consumers.

5 **PRAYER FOR RELIEF**

6 The People respectfully request that the Court enter judgment in favor of the People and
7 against Defendants, jointly and severally, and grant the following relief:

8 1. Enjoin all Defendants, their successors, agents, representatives, employees, and any and
9 all other persons who act in concert or participation with Defendants by preliminarily and permanently
10 restraining them from performing or proposing to perform any acts in violation of California Business
11 and Professions Code section 17200 as set forth above, including but not limited to ceasing operation
12 of all websites they own or operate that are capable of creating AI-generated NCII of identifiable
13 individuals.

14 2. Order that any domain-name registrars, domain-name registries, webhosts, payment
15 processors, or companies providing user authentication and authorization services or interfaces who
16 are provided with notice of the injunction, shall take all actions necessary to restrain Defendants from
17 performing or proposing to perform any unlawful or unfair business practices in violation of California
18 Business and Professions Code section 17200, including but not limited to ceasing to facilitate access
19 to any websites owned or operated by Defendants that are capable of creating AI-generated NCII of
20 identifiable individuals.

21 3. Order each Defendant to pay a civil penalty of \$2,500 for each violation of California
22 Business and Professions Code section 17200.

23 4. Order Defendants to pay the costs of suit; and

24 5. Provide such further and additional relief as the Court deems just, proper, and
25 equitable.

1 Dated: March 10, 2025

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