

**IN THE CIRCUIT COURT OF
THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY**

OFFICE OF THE ATTORNEY GENERAL,
STATE OF FLORIDA,
DEPARTMENT OF LEGAL AFFAIRS,

Plaintiff,

v.

CIVIL DIVISION

CASE NO.:

WEBGROUP CZECH REPUBLIC, A.S.
D/B/A XVIDEOS.COM, NKL ASSOCIATES
S.R.O D/B/A XNXX.COM, SONESTA
TECHNOLOGIES S.R.O. D/B/A
BANGBROS.COM, SONESTA MEDIA S.R.O.
D/B/A BANGBROS.COM, SONESTA
TECHNOLOGIES, INC. D/B/A
BANGBROS.COM, GGW GROUP S.R.O.
D/B/A GIRLSGONEWILD.COM, GTFLIX TV
S.R.O. D/B/A GIRLSGONEWILD.COM, GGW
GROUP LLC D/B/A GIRLSGONEWILD.COM,
and TRAFFIC F, S.R.O. D/B/A
TRAFFICFACTORY.COM,

Defendants.

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COMPLAINT

1. Access to online pornography is a pervasive threat to the health and well-being of children and adolescents. An estimated 50 percent of all internet traffic is related to sex, and children and adolescents are routinely exposed to pornography online. One study reported that 70 percent of teens accidentally stumble upon pornography online. Another found that 56 percent of U.S. high school students viewed pornography in 2020. This pornography exposure is dangerous as adolescents who view pornography tend to have more sexually permissive attitudes and more sexual partners in their lifetimes. They also are more likely to display sexual aggression and engage in certain sexual acts. Adolescents who view pornography often report feeling insecure

about their ability to perform sexually and how they look. And like drugs and alcohol, pornography use changes the reward circuitry of the brain, which can lead to a debilitating loss of self-control and addiction.

2. Last year, bipartisan supermajorities of both houses of the Florida Legislature acted to curb these deleterious effects and protect the impressionable minds of children and adolescents. H.B. 3, 2024 Leg., Reg. Sess. (Fla. 2024) (codified at §§ 501.1736–.1738, Fla. Stat. (2024)). Sections 501.1737 and 501.1738 require commercial entities that distribute sexually explicit material online that is harmful to minors to verify that individuals attempting to access the material are at least 18 years of age. These provisions also vest the Attorney General of Florida with the responsibility to bring violators of the law to justice.

3. WebGroup Czech Republic, a.s. d/b/a XVideos.com, NKL Associates s.r.o. d/b/a XNXX.com, Sonesta Technologies s.r.o. d/b/a BangBros.com, Sonesta Media s.r.o. d/b/a BangBros.com, Sonesta Technologies, Inc. d/b/a BangBros.com, GGW Group s.r.o d/b/a GirlsGoneWild.com, GTFLIX TV s.r.o d/b/a GirlsGoneWild.com, GGW Group LLC d/b/a GirlsGoneWild.com, and pornographic advertiser Traffic F, s.r.o. d/b/a TrafficFactory.com (collectively “the Pornographers”) publish sexually explicit material online that is harmful to minors. XVideos.com and XNXX.com are free to access and receive hundreds of millions of visits monthly worldwide and several million in Florida alone. GirlsGoneWild.com offers mostly paid sexually explicit content with explicit free previews and receives hundreds of thousands of visits monthly worldwide.

4. The Pornographers know that they are subject to Florida’s age-verification requirements. A blog post linked at the top of XVideos.com and XNXX.com decries age

verification and bemoans that compliance with age-verification requirements would hurt their bottom line.

5. Despite knowing that they must comply with Florida's age-verification law, the Pornographers have openly defied this law since it took effect January 1, 2025. Indeed, the Attorney General wrote letters to two of the Pornographers in April demanding that they comply with Florida's age-verification law or face legal action. Nothing has changed.

6. Each day that the Pornographers continue to violate Florida's age-verification law, they rack up tens, if not hundreds, of thousands of violations of these provisions and of the Florida Deceptive and Unfair Trade Practices Act ("FDUTPA"), Chapter 501, Part II, Florida Statutes (2024).

7. Motivated by greed, the Pornographers willfully prey on the children and adolescents of Florida to the detriment of their health and well-being.

8. As the State of Florida's chief law enforcement officer, the Attorney General brings this lawsuit pursuant to FDUTPA to put an end to the Pornographers' shameful and malicious infliction of harm on children and adolescents in Florida. On behalf of all minor residents of Florida, the Attorney General seeks to compel the Pornographers to comply with their obligations under Florida's age-verification law as well as FDUTPA to stop the unfair and deceptive business practices that the Pornographers have used to build a vast and lucrative Florida user base that includes vulnerable children and adolescents.

PARTIES

9. Plaintiff, the Attorney General of the State of Florida, is authorized to enforce Sections 501.1737 and FDUTPA. As *parens patriae*, the State of Florida through the Attorney General is authorized to bring this suit on behalf of all minor residents of Florida to protect the

State of Florida's quasi-sovereign interest in their health and well-being. The Attorney General has investigated the matters alleged in this Complaint and has determined that this enforcement action serves the public interest as required by Section 501.207, Florida Statutes (2024).

10. Defendant WebGroup Czech Republic, a.s. ("WebGroup") is a for-profit entity incorporated in the Czech Republic. WebGroup is headquartered at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic. WebGroup conducts business throughout the United States including within the State of Florida. It owns the pornographic website XVideos.com through which it publishes and distributes sexual material that is harmful to minors. Stephane Michael Pacaud and Robert Seifert own and/or manage WebGroup.

11. Defendant NKL Associates s.r.o. ("NKL") is a for-profit entity incorporated in the Czech Republic. NKL is headquartered at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic. NKL conducts business throughout the United States including within the State of Florida. It owns the pornographic website XNXX.com through which it publishes and distributes sexual material that is harmful to minors. Stephane Michael Pacaud and Robert Seifert own and/or manage NKL.

12. Defendant Sonesta Technologies s.r.o ("Sonesta Tech") is a for-profit entity incorporated in the Czech Republic. Sonesta Tech is headquartered at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic. Sonesta Tech conducts business throughout the United States including within the State of Florida. Stephane Michael Pacaud and Robert Seifert own and/or manage Sonesta Tech.

13. Defendant Sonesta Media s.r.o. ("Sonesta Media") is a for-profit entity incorporated in the Czech Republic. Sonesta Media is headquartered at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic. Sonesta Media conducts business throughout the United States

including within the State of Florida. Stephane Michael Pacaud and Robert Seifert own and/or manage Sonesta Media.

14. Defendant Sonesta Technologies, Inc. (“Sonesta Florida”) is a for-profit entity incorporated in Florida. Sonesta Florida is headquartered at 12378 SW 82nd Avenue, Miami, Florida, 33156. Sonesta Florida conducts business throughout the United States including within the State of Florida. It was originally incorporated in 2002 as BangBros.com, Inc., and changed its name to Sonesta Technologies, Inc. in 2014. Andrew Hendrixson manages Sonesta Florida.

15. Sonesta Tech, Sonesta Media, and Sonesta Florida (collectively “Bang Bros”) are intertwined entities that act in concert to produce, license, and promote Bang Bros-branded pornographic content. They run a subscription-based service on BangBros.com through which purchasers can access that content.

16. Defendant GGW Group s.r.o (“GGW Group”) is a for-profit entity incorporated in the Czech Republic. GGW Group is headquartered at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic. GGW Group conducts business throughout the United States including within the State of Florida. On information and belief, Stephane Michael Pacaud and Robert Seifert own/manage GGW Group.

17. Defendant GTFLIX TV, s.r.o (“GTFLIX”) is a for-profit entity incorporated in the Czech Republic. GTFLIX is headquartered at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic. GTFLIX conducts business throughout the United States including within the State of Florida. On information and belief, Stephane Michael Pacaud and Robert Seifert own/manage GTFLIX.

18. Defendant GGW Group LLC (“GGW Florida”) is a for-profit entity incorporated in Florida. GGW Florida is headquartered at 1622 NE 2nd Ave, Miami, Florida, 33132. GGW

Florida conducts business throughout the United States including within the State of Florida. Andrew Hendrixson manages GGW Florida.

19. GGW Group, GTFLIX, and GGW Florida (collectively “Girls Gone Wild”) are intertwined entities that act in concert to produce, license, and promote Girls Gone Wild-branded pornographic content. They offer paid content and free explicit previews on GirlsGoneWild.com, which describes Girls Gone Wild content as “extreme porn and sexy scenes. Discover the hottest and naughtiest women fucking, masturbating, sucking dicks, eating cum, having hardcore doggy style sex or gangbangs.”

20. Defendant Traffic F, s.r.o. (“Traffic F”) is a for-profit entity incorporated in the Czech Republic. Traffic F is headquartered at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic. Traffic F conducts business throughout the United States including within the State of Florida. It owns the pornographic advertiser TrafficFactory.com through which it publishes and distributes advertisements that contain sexual material that is harmful to minors. Stephane Michael Pacaud and Robert Seifert own and/or manage Traffic F.

JURISDICTION AND VENUE

21. This is an action for statutory and equitable relief under FDUTPA for violations of Sections 501.1737 and 501.204. The Attorney General seeks relief in an amount greater than Fifty Thousand Dollars (\$50,000), exclusive of fees and costs.

22. The Pornographers’ statutory violations occurred in or affect more than one judicial circuit in the State of Florida, including the Twelfth Judicial Circuit in and for Sarasota County.

23. This Court has subject matter jurisdiction over this matter under § 26.012(2)(a), Fla. Stat. (2024).

24. Venue is proper in this Court because allegations in this Complaint establish that the cause of action accrued at locations across Florida including at 140 University Town Center Dr., Sarasota, FL 34243 in Sarasota County. *See* § 47.051, Fla. Stat. (2024). The Pornographers' websites, content, and advertisements are accessible from 140 University Town Center Dr.

25. This Court has personal jurisdiction over the Pornographers under Florida's age-verification law, § 501.1737(6), Fla. Stat. (2024), and Florida's long-arm statute, § 48.193(1)(a)(1), Fla. Stat. (2024), because the Pornographers, who each individually qualify as a commercial entity, are engaged in business in the State of Florida as they distribute material harmful to minors on XVideos.com, XNXX.com, and GirlsGoneWild.com, which contain a substantial portion of material harmful to minors and are accessible in the State of Florida.

26. XVideos.com is currently the 20th most popular website in the world with 1.228 billion monthly visitors, 21 percent or 257.8 million of which are from the U.S. As Florida comprises nearly 7 percent of the U.S. population, XVideos.com receives approximately 18 million visits from Florida a month.

27. Whenever someone accesses XVideos.com they agree to XVideos.com's Terms of Service, which is a contract between the user and WebGroup. Under that contract, the user agrees to allow WebGroup to collect data about the user, including the user's location and the kinds of content that the user views, so WebGroup can tailor XVideos.com's content recommendations for that user. The user also agrees not to reproduce, distribute, or otherwise exploit the content, trademarks, service marks, and logos on XVideos.com. WebGroup reserves the right to amend this contractual relationship by updating the Terms of Service and a change becomes effective immediately. In return, WebGroup makes XVideos.com available to the user. This contractual relationship involves ongoing performance by both parties, with both the user and WebGroup

performing under the contract each time the user accesses XVideos.com and after the user leaves the site.

28. As part of this ongoing relationship, XVideos.com provides features that tailor the site's experience to a specific user including users in Florida. XVideos.com has a "Watch Later" button that allows a user to create a playlist of videos. The playlist remains on the site even when a user leaves the site, so when the user returns to XVideos.com, the user can access the playlist that XVideos.com has saved for the user.

29. The content that XVideos.com displays is determined in part by a user's location. The recommended content changes based on the country from which a user accesses XVideos.com. The recommended content also changes based on the U.S. state from which a user accesses XVideos.com.

30. The content that XVideos.com suggests to users changes based on the videos that a user previously watched. For example, if a user selects three videos featuring Asian women, the top recommended videos on XVideos.com change to videos featuring Asian women.

31. XVideos.com contains location specific advertisements for states and cities within the U.S. For example, a user in Pensacola is more likely to see an advertisement to meet women in the Pensacola area than a user in Miami.

32. XNXX.com is currently the 30th most popular website in the world with 740.4 million monthly visitors, 30 percent or 222.1 million of which are from the U.S. As Florida comprises nearly 7 percent of the U.S. population, XNXX.com receives approximately 16 million visits from Florida a month.

33. Whenever someone accesses XNXX.com they agree to XNXX.com's Terms of Service, which is a contract between the user and NKL. Under that contract, the user agrees to

allow NKL to collect data about the user, including the user's location and the kinds of content that the user views, so NKL can tailor XNXX.com's content recommendations for that user. The user also agrees not to reproduce, distribute, or otherwise exploit the content, trademarks, service marks, and logos on XNXX.com. NKL reserves the right to amend this contractual relationship by updating the Terms of Service and a change becomes effective immediately. This contractual relationship involves ongoing performance by both parties, with both the user and NKL performing under the contract each time the user accesses XNXX.com and after the user leaves the site.

34. The content that XNXX.com displays to users is determined in part by the user's location. The recommended content changes based on the country from which a user accesses XNXX.com. The recommended content also changes based on the U.S. state from which a user accesses XNXX.com.

35. XNXX.com contains location specific advertisements for states and cities within the U.S. For example, a user in Pensacola is more likely to see an advertisement to meet women in the Pensacola area than a user in Miami.

36. Traffic F controls the domain TrafficFactory.com, which is a landing page to drive new advertising business for XVideos.com and XNXX.com. Traffic F has the same principal address as WebGroup and NKL at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic.

37. TrafficFactory.com provides geo-fencing and location-based advertising, which requires it to collect users' location data from XVideos.com and XNXX.com including from Florida residents, so it can tailor advertisements for users in Florida.

38. Bang Bros publishes and distributes its content on XVideos.com and XNXX.com to drive business to its paid site BangBros.com.

39. Bang Bros tailors its content to Florida audiences including under the name “Bang Bus.” Florida-specific content includes videos filmed under a “305 Bus” moniker, a reference to the Miami area code. Other Bang Bros content references Miami in the title. This content is available on XVideos.com and XNXX.com. On information and belief, Bang Bros content is produced in Florida.

40. Bang Bros also specifically advertises its content to Florida residents. In 2019 Bang Bros announced a bid for the naming rights to the home arena of the Miami Heat. In promoting its bid to have the arena named “Bang Bros Center,” Bang Bros stated, “Miami is known for many things-South Beach, beautiful women, and sports teams like the professional NBA team the Miami Heat. Miami is also known for BangBros.”

41. Girls Gone Wild publishes and distributes its content on XVideos.com and XNXX.com to drive business to its paid site GirlsGoneWild.com. GGW Group and GTFLIX have the same principal address as WebGroup and NKL at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic.

42. GirlsGoneWild.com has over 353,000 monthly visitors, 37.5 percent of which are from the U.S. As Florida comprises nearly 7 percent of the U.S. population, GirlsGoneWild.com receives approximately 9,200 visits from Florida a month.

43. Whenever someone accesses GirlsGoneWild.com, they agree to GirlsGoneWild.com’s Privacy Statement, which is a contract between the user and GTFLIX. Under that contract, the user agrees to allow GTFLIX to collect data about the user, including the user’s location and the kinds of content that the user views, so GTFLIX can tailor GirlsGoneWild.com’s content and advertisements for that user. GTFLIX “process[es] this information as it is necessary for the adequate performance of the contract with [the user].” In

return, GTFLIX makes GirlsGoneWild.com available to the user and gives the user a continuing right to ask GTFLIX to correct any inaccurate or incomplete information. This contractual relationship involves ongoing performance by both parties, with both the user and GTFLIX performing under the contract each time the user accesses GirlsGoneWild.com and after the user leaves the site as GTFLIX processes a user's data to ensure a bespoke experience when the user returns to the site.

44. On information and belief, the Pornographers sell subscriptions for paid pornographic content to residents of Florida.

45. The conduct described in this Complaint and the harm it causes arise from the Pornographers' activities directed to Florida and to XVideos.com and XNXX.com users in Florida.

FACTUAL ALLEGATIONS

I. Florida's Age-Verification Law Requires that Pornographic Websites Verify Users' Ages

46. In 2024, the Florida Legislature enacted Sections 501.1737 and 501.1738, which among other things, require pornographic websites to verify users ages when they attempt to access sexually explicit content.

47. Specifically, Section 501.1737 requires a "commercial entity that knowingly and intentionally publishes or distributes material harmful to minors on a website or application" to "use either anonymous age verification or standard age verification to verify that the age of a person attempting to access the material is 18 years of age or older and prevent access to the material by a person younger than 18 years of age" if the "website or application contains a substantial portion of material harmful to minors." § 501.1737(2), Fla. Stat. (2024)

48. A “commercial entity” includes a “corporation, a limited liability company, a partnership, a limited partnership, a sole proprietorship, and any other legally recognized entity.” § 501.1737(1)(b), Fla. Stat. (2024)

49. “Distribute” means to “issue, sell, give, provide deliver, transfer, transmit, circulate, or disseminate by any means.” § 501.1737(1)(d), Fla. Stat. (2024).

50. “Publish” means to “communicate or make information available to another person or entity on a publicly available website or application.” § 501.1737(1)(g), Fla. Stat. (2024).

51. “Willful disregard of a person’s age constitutes a knowing and intentional violation.” Fla. Admin. Code R. 2-44.002(1).

52. “Material harmful to minors” is material that the “average person applying contemporary community standards would find, taken as a whole, appeals to the prurient interest” which “[d]epicts or describes, in a patently offensive way, sexual conduct” that “[w]hen taken as a whole, lacks serious literary, artistic, political, or scientific value for minors.” § 501.1737(1)(e), Fla. Stat. (2024).

53. A “substantial portion” means “more than 33.3 percent of total material on a website or application.” § 501.1737(1)(j), Fla. Stat. (2024). “Commercial entities must calculate the proportion of 33.3% of total material on a website or application such that it measures the total material on a website or application that is available to any minor, regardless of the medium in which it is available.” Fla. Admin. Code R. 2-44.001(2)(a). “The proportion must be based on measuring all content posted on a website or application. Any portion of harmful material on a single piece of content renders the entire piece of content harmful.” Fla. Admin. Code R. 2-44.001(2)(b). “The proportion must be calculated regardless of the existence of any framework

that entails creation of an account to access any material. Webpage includes any portion of website available only by way of account.” Fla. Admin. Code R. 2-44.001(2)(c).

54. “Sexual conduct” is defined as “actual or simulated sexual intercourse, deviate sexual intercourse, sexual bestiality, masturbation, or sadomasochistic abuse; actual or simulated lewd exhibition of the genitals; actual physical contact with a person’s clothed or unclothed genitals, pubic area, buttocks, or, if such person is a female, breast with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed.” §§ 501.1737(1)(e)(2), 847.001(19), Fla. Stat. (2024).

55. “Standard age verification” means “any commercially reasonable method of age verification approved by the commercial entity.” § 501.1737(1)(i), Fla. Stat. (2024). “Commercially reasonable method of age verification” is defined as a “method of verifying age that is regularly used by the government or businesses for the purpose of age and identity verification.” Fla. Admin. Code R. 2-44.001(1)(a).

56. “Anonymous age verification” means a “commercially reasonable method used by a government agency or a business for the purpose of age verification which is conducted by a nongovernmental, independent third party organized under the laws of a state of the United States,” which “[h]as its principal place of business in a state of the United States” and “[i]s not owned or controlled by a company formed in a foreign country, a government of a foreign country, or any other entity formed in a foreign country.” §§ 501.1737(1)(a), 501.1738(1), Fla. Stat. (2024).

57. Any violation of Florida’s age-verification law “is deemed an unfair and deceptive trade practice actionable” by the Attorney General against a commercial entity. § 501.1737(5)(a), Fla. Stat. (2024). If the Attorney General “has reason to believe that a commercial entity is in

violation” of the age-verification requirement, the Attorney General “may bring an action against the commercial entity for an unfair or deceptive act or practice.” § 501.1737(5)(a), Fla. Stat. (2024).

58. Section 501.1737 authorizes the Attorney General to “collect a civil penalty of up to \$50,000 per violation and reasonable attorney fees and court costs.” § 501.1737(5)(a), Fla. Stat. (2024). Punitive damages “may be assessed against the commercial entity” if its failure to comply with the age-verification requirement “is a consistent pattern of conduct of the commercial entity.” § 501.1737(5)(a), Fla. Stat. (2024).

II. WebGroup’s Knowing and Intentional Violations of the Age-Verification Law

59. WebGroup is a commercial entity as defined in Section 501.1737(1)(b), Florida Statutes (2024), which operates XVideos.com.

60. XVideos.com is a pornographic website that publishes and distributes material harmful to minors as defined in Section 501.1737(1)(e), Florida Statutes (2024), as more than 33.3 percent of the content on XVideos.com are patently offensive depictions of sexual conduct that the average person applying contemporary standards would find, taken as a whole, appeals to the prurient interest and that when taken as a whole, lacks serious literary, artistic, political, or scientific value for minors. §§ 501.1737(1)(e)(2), 847.001(19), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).

61. XVideos.com is currently the 20th most popular website in the world with 1.228 billion monthly visitors, 21 percent or 257.8 million of which are from the U.S. As Florida comprises nearly 7 percent of the U.S. population, XVideos.com receives approximately 18 million visits from Florida a month.

62. Generally, when someone visits XVideos.com, the website opens to a main page that suggests videos of sexual conduct to the user with titles such as “Hot Milf invite Me in The

Room and I Creampie Her Ass,” “It Barely Fit – Tiny Asian Loves Big Dick,” and “My naughty StepSis did it again. Said she wouldn’t leave my room until . . .” The suggested video thumbnails display unblurred clips and still images of sexual conduct including vaginal penetration, anal penetration, and oral sex.

63. If a user selects one of the suggested videos on the main page, another page opens where the user can watch the full video depicting sexual conduct. The video-specific page also contains thumbnails of other videos of similarly themed sexual conduct.

64. At the top of the main page of XVideos.com is a banner that states “The SCAM of age verification. It’s coming. Read our latest blog post.” If a user clicks on the banner, a different page opens that displays a writing titled “The Scam of Age Verification.” The writing declares that the “idiocracy has won. [Age verification] is coming into force across multiple countries—many around the same time. We’ll be forced to verify your age, and we already know we’ll lose almost all our users in the process. . . . We’re witnessing censorship disguised as ‘protection,’ incompetence dressed up as virtue, and a total collapse of rational policymaking.”

65. Also on the main page, a dropdown menu offers a list of categories from which a user can select to see videos in a specific thematic category. The categories of sexual conduct include “Gangbang,” “Hardcore,” and “Fucked Up Family.” Once a user selects a category, XVideos.com suggests videos of sexual conduct that fit the theme with unblurred thumbnails that depict clips and still images of sexual conduct.

66. For example, the “Fucked Up Family” category suggests a video titled “step MOM encourages step BROTHER to fuck step SISTER – Bunny Colby.” The thumbnail for the video depicts unblurred clips of sexual conduct between three individuals including oral sex and vaginal penetration. If a user clicks on the video, a page opens where the user can play the full video.

67. The main page of XVideos.com also has a search bar that allows a user to input terms to search for videos of sexual conduct. A search brings up thumbnails that display unblurred clips and still images of sexual conduct. If a user clicks on a video, a page opens where the user can play the full video.

68. Despite being subject to Florida’s age-verification law, at no point when a user accesses the videos of sexual conduct on XVideos.com—whether on the main page, through the categories or the search function, or on a page where a user can watch a specific video—does XVideos.com attempt to verify through any method that a user is at least 18 years of age. WebGroup knowingly and intentionally fails to verify the ages of its users. Each time that a Florida resident visits XVideos.com constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

69. On April 10, 2025, the Office of the Attorney General sent a letter to WebGroup notifying WebGroup of its noncompliance with Florida’s age-verification law, demanding compliance within 30 days, and warning of a potential enforcement action for continued noncompliance. Despite this letter, WebGroup continues its consistent pattern of knowingly and intentionally failing to verify the ages of its users in violation of Section 501.1737(5)(a), Florida Statutes (2024).

III. NKL’s Knowing and Intentional Violations of the Age-Verification Law

70. NKL is a commercial entity as defined in Section 501.1737(1)(b), Florida Statutes (2024), which operates XNXX.com.

71. XNXX.com is a pornographic website that publishes and distributes material harmful to minors as defined in Section 501.1737(1)(e), Florida Statutes (2024), as more than 33.3 percent of the content on XNXX.com are patently offensive depictions of sexual conduct that

the average person applying contemporary standards would find, taken as a whole, appeals to the prurient interest and that when taken as a whole, lacks serious literary, artistic, political, or scientific value for minors. §§ 501.1737(1)(e)(2), 847.001(19), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).

72. XNXX.com is currently the 30th most popular website in the world with 740.4 million monthly visitors, 30 percent or 222.1 million of which are from the U.S. As Florida comprises nearly 7 percent of the U.S. population, XNXX.com receives approximately 16 million visits from Florida a month.

73. Generally, when someone visits XNXX.com, the website opens to a main page that declares “100% Free Porn Movies and Sex Content.” The main page suggests videos of sexual conduct to the user under various categories such as “Today’s selection,” “Family,” and “Hardcore” The suggested video thumbnails display unblurred clips and still images of sexual conduct including vaginal penetration, anal penetration, and oral sex.

74. If a user selects one of the suggested categories on the main page, another page opens where the user can find thumbnails of videos in that category depicting sexual conduct. The thumbnails depict unblurred clips and still images of sexual conduct.

75. For example, the “Family” category page begins with a video titled “stepMOM and stepSON do their thing while drinking.” The thumbnails depict unblurred clips of vaginal penetration. If a user selects the thumbnail, it opens a page where the user can watch the full video. The video-specific page also suggested “Related videos” of similarly themed sexual conduct with thumbnails that depict sexual conduct.

76. The top of the main page of XNXX.com also has a banner that states “The SCAM of age verification. It’s coming. Read our latest blog post.” If a user clicks on the banner, a different

page opens that displays a writing titled “The Scam of Age Verification.” The writing declares that the “idiocracy has won. [Age verification] is coming into force across multiple countries—many around the same time. We’ll be forced to verify your age, and we already know we’ll lose almost all our users in the process. . . . We’re witnessing censorship disguised as ‘protection,’ incompetence dressed up as virtue, and a total collapse of rational policymaking.”

77. Also on the main page, a dropdown menu links to a list of “Tags,” which display various categories from which a user can select to see videos in a specific thematic category and the number of videos in each category. The categories of sexual conduct include “ass fisting” with 251,480 videos, “rough sex porn” with 492,393 videos, and “young” with 156,003 videos. Once a user selects a category, XNXX.com suggests videos of sexual conduct that fit the theme with unblurred thumbnails that depict clips and still images of sexual conduct.

78. The main page of XNXX.com also has a search bar that allows a user to input terms to search for videos of sexual conduct. A search brings up thumbnails that display unblurred clips and still images of sexual conduct. If a user clicks on a video, a page opens where the user can play the full video.

79. Despite being subject to Florida’s age-verification law, at no point when a user accesses the videos of sexual conduct on XNXX.com—whether on the main page, through the “Tags” or the search function, or on a page where a user can watch a specific video—does XNXX.com attempt to verify through any method that a user is at least 18 years of age. NKL knowingly and intentionally fails to verify the ages of its users. Each time that a Florida resident visits XNXX.com constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

80. On April 10, 2025, the Office of the Attorney General sent a letter to NKL notifying NKL of its noncompliance with Florida’s age-verification law, demanding compliance within 30 days, and warning of a potential enforcement action for continued noncompliance. Despite this letter, NKL continues its consistent pattern of knowingly and intentionally failing to verify the ages of its users in violation of Section 501.1737(5)(a), Florida Statutes (2024).

IV. Bang Bros’s Knowing and Intentional Violations of the Age-Verification Law

81. Bang Bros comprises three commercial entities as defined in Section 501.1737(1)(b), Florida Statutes (2024), which produce and own Bang Bros content and operate BangBros.com.

82. Bang Bros content is material harmful to minors as it depicts in a patently offensive way sexual conduct including vaginal penetration, anal penetration, and oral sex that when taken as a whole, lacks serious literary, artistic, political, or scientific value for minors and that the average person applying contemporary community standards would find, taken as a whole, appeals to the prurient interest. §§ 501.1737(1)(e), 847.001(19) Fla. Stat. (2024).

83. Bang Bros publishes and distributes Bang Bros content on XVideos.com and XNXX.com, which are pornographic websites that publish and distribute material harmful to minors as defined in Section 501.1737(1)(e), Florida Statutes (2024), as more than 33.3 percent of the content on those sites are patently offensive depictions of sexual conduct that the average person applying contemporary standards would find, taken as a whole, appeals to the prurient interest and that when taken as a whole, lacks serious literary, artistic, political, or scientific value for minors. §§ 501.1737(1)(e)(2), 847.001(19), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001.

84. Despite being subject to Florida’s age-verification law as commercial entities that knowingly and intentionally publish and distribute material harmful to minors on XVideos.com and XNXX.com, at no point when a user accesses Bang Bros content on those sites is there an

attempt verify through any method that a user is at least 18 years of age. Bang Bros knowingly and intentionally fails to verify the ages of individuals who access Bang Bros content on XVideos.com and XNXX.com. Each time that a Florida resident accesses Bang Bros content on XVideos.com and XNXX.com constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

V. Girls Gone Wild’s Knowing and Intentional Violations of the Age-Verification Law

85. Girls Gone Wild comprises three commercial entities as defined in Section 501.1737(1)(b), Florida Statutes (2024), which produce and own Girls Gone Wild content and operate GirlsGoneWild.com.

86. Girls Gone Wild content is material harmful to minors as it depicts in a patently offensive way sexual conduct including, per its own description, “the hottest and naughtiest women fucking, masturbating, sucking dicks, eating cum, having hardcore doggy style sex or gangbangs.” That content when taken as a whole, lacks serious literary, artistic, political, or scientific value for minors and that the average person applying contemporary community standards would find, taken as a whole, appeals to the prurient interest. §§ 501.1737(1)(e), 847.001(19), Fla. Stat. (2024).

87. GirlsGoneWild.com has over 353,000 monthly visitors, 37.5 percent of which are from the U.S. As Florida comprises nearly 7 percent of the U.S. population, GirlsGoneWild.com receives approximately 9,200 visits from Florida a month.

88. Girls Gone Wild publishes and distributes Girls Gone Wild content on XVideos.com, XNXX.com, and GirlsGoneWild.com, which are pornographic websites that publish and distribute material harmful to minors as defined in Section 501.1737(1)(e), Florida Statutes (2024), as more than 33.3 percent of the content on those sites are patently offensive depictions of sexual conduct that the average person applying contemporary standards would find,

taken as a whole, appeals to the prurient interest and that when taken as a whole, lacks serious literary, artistic, political, or scientific value for minors. §§ 501.1737(1)(e)(2), 847.001(19), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).

89. Despite being subject to Florida’s age-verification law as commercial entities that knowingly and intentionally publish and distribute material harmful to minors on GirlsGoneWild.com, Girls Gone Wild does not verify that a user is at least 18 years of age when the user accesses the GirlsGoneWild.com homepage and its free explicit previews, which display unblurred still images and clips of women engaged in oral sex, penetrating each other with their fingers, masturbation, and women using sex toys on other women. Girls Gone Wild knowingly and intentionally fails to verify the ages of individuals who access Girls Gone Wild content on GirlsGoneWild.com. Each time that a Florida resident visits GirlsGoneWild.com constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

90. Despite being subject to Florida’s age-verification law as commercial entities that knowingly and intentionally publish and distribute material harmful to minors on XVideos.com and XNXX.com, at no point when a user accesses Girls Gone Wild content on those sites is there an attempt verify through any method that a user is at least 18 years of age. Girls Gone Wild knowingly and intentionally fails to verify the ages of individuals who access Girls Gone Wild content on XVideos.com and XNXX.com. Each time that a Florida resident accesses Girls Gone Wild content on XVideos.com and XNXX.com constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

VI. Traffic F’s Knowing and Intentional Violations of Florida’s Age-Verification Law

91. Traffic F is a commercial entity as defined in Section 501.1737(1)(b), Florida Statutes (2024), which operates the pornographic advertiser TrafficFactory.com.

92. Traffic F conducts geo-targeted advertising with advertisements that contain material harmful to minors as the advertisements depicts in a patently offensive way sexual conduct including masturbation, vaginal penetration, and oral sex that when taken as a whole, lacks serious literary, artistic, political, or scientific value for minors and that the average person applying contemporary community standards would find, taken as a whole, appeals to the prurient interest. §§ 501.1737(1)(e), 847.001(19), Fla. Stat. (2024).

93. Traffic F knowingly and intentionally publishes and distributes these advertisements that contain material harmful to minors on XVideos.com and XNXX.com, which are pornographic websites that publish and distribute material harmful to minors as defined in Section 501.1737(1)(e), Florida Statutes (2024), as more than 33.3 percent of the content on those sites are patently offensive depictions of sexual conduct that the average person applying contemporary standards would find, taken as a whole, appeals to the prurient interest and that when taken as a whole, lacks serious literary, artistic, political, or scientific value for minors. §§ 501.1737(1)(e)(2), 847.001(19), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).

94. Despite being subject to Florida's age-verification law as a commercial entity that knowingly and intentionally publishes and distributes material harmful to minors on XVideos.com and XNXX.com, at no point when a user accesses the advertisements of sexual conduct on those sites is there an attempt to verify through any method that a user is at least 18 years of age. Traffic F knowingly and intentionally fails to verify the ages of individuals who access its advertisements on XVideos.com and XNXX.com. Each time that a Florida resident accesses Traffic F advertisements on XVideos.com and XNXX.com constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

VII. Agreement and Concerted Effort by the Pornographers to Violate the Age-Verification Law

95. On information and belief, Stephane Pacaud and Robert Seifert are the ultimate beneficial owners/managers of the Pornographers.

96. WebGroup, NKL, Sonesta Tech, Sonesta Media, GGW Group, and GTFLIX operate out of the same headquarters at Krakovská 1366/25, Nové Město, 110 00 Prague, Czech Republic.

97. Sonesta Florida and GGW Florida have the same manager/director: Andrew Hendrixson.

98. Sonesta Technologies, Sonesta Media, and Sonesta Florida are intertwined entities that produce, own, and distribute Bang Bros content and operate BangBros.com.

99. GGW Group, GTFLIX, GGW Florida are intertwined entities that produce, own, and distribute Girls Gone Wild content.

100. The Pornographers' common ownership, control, and operations support the inference that they acted in concert and formed an express or implied agreement to violate Florida's age-verification law.

101. The Pornographers published and distributed the blog post titled "The Scam of Age Verification" that expresses their opposition to age-verification laws including Florida's and stating that compliance with age verification laws would substantially reduce their traffic and revenue.

102. As evidenced by statements contained in the June 30, 2025, blog post, the Pornographers expected to receive increased revenue because of their noncompliance with Florida's age-verification law.

103. The Pornographers have interdependent business models. WebGroup and NKL knowingly and intentionally fail to verify the ages of visitors of XVideos.com and XNXX.com,

which increases the exposure of Bang Bros and Girls Gone Wild content that Bang Bros and Girls Gone Wild publish and distribute on those sites. Increased exposure results in more subscriptions for paid Bang Bros and Girls Gone Wild content. WebGroup's and NKL's failure to verify users' ages also increases the value of advertising space on the website, which inures to the benefit of WebGroup, NKL, and Traffic F.

104. To achieve these increased revenue streams for each of the Pornographers, WebGroup and NKL knowingly and intentionally make accessible to Florida residents including minors the material Bang Bros, Girls Gone Wild, and Traffic F publish and distribute on XVideos.com and XNXX.com.

105. The Pornographers' interconnectivity is further exhibited by joint advertisements for Bang Bros and Girls Gone Wild.

106. The Pornographers agreed, conspired, and/or coordinated to publish and distribute Bang Bros content and Traffic F pornographic advertisements on XVideos.com and XNXX.com without verifying the ages of users who access that material as required by Section 501.1737.

107. The State of Florida is harmed by this unlawful arrangement as it exposes minors in Florida to material that is harmful to their health and well-being.

CAUSES OF ACTION

COUNT I

Violation of Section 501.1737 and FDUTPA by WebGroup

108. All foregoing paragraphs are incorporated by reference.

109. WebGroup is a "commercial entity" within the meaning of Florida's age-verification law and subject to regulation under it because WebGroup publishes and distributes material harmful to minors on XVideos.com, which contains a substantial portion of material harmful to minors. § 501.1737(1)(b), (e), (j), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).

110. WebGroup has knowingly and intentionally violated Florida’s age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.002(1).

111. Each knowing and intentional violation of Florida’s age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

112. The Court should enjoin WebGroup from continuing to violate Section 501.1737 and FDUTPA.

113. The Court should assess penalties in the amount of up to \$50,000 for each violation in accordance with Section 501.1737(5)(a), Florida Statutes (2024).

114. The Court should assess punitive damages for WebGroup’s “consistent pattern” of failing to verify the ages of XVideos.com’s users. § 501.1737(5)(a), Fla. Stat. (2024).

115. The Court should order that WebGroup divest ownership of the XVideos.com domain name. §§ 501.1737(5)(a), 501.207(3), Fla. Stat. (2024).

COUNT II
Violation of Section 501.1737 and FDUTPA by NKL

116. The allegations in paragraphs 1 through 107 are incorporated by reference.

117. NKL is a “commercial entity” within the meaning of Florida’s age-verification law and subject to regulation under it because NKL publishes and distributes material harmful to minors on XNXX.com, which contains a substantial portion of material harmful to minors. § 501.1737(1)(b), (e), (j), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).

118. NKL has knowingly and intentionally violated Florida’s age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.002(1).

119. Each knowing and intentional violation of Florida’s age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

120. The Court should enjoin NKL from continuing to violate Section 501.1737 and FDUTPA.

121. The Court should assess penalties in the amount of up to \$50,000 for each violation in accordance with Section 501.1737(5)(a), Florida Statutes (2024).

122. The Court should assess punitive damages for NKL’s “consistent pattern” of failing to verify the ages of XNXX.com’s users. § 501.1737(5)(a), Fla. Stat. (2024).

123. The Court should order that NKL divest ownership of the XNXX.com domain name. §§ 501.1737(5)(a), 501.207(3), Fla. Stat. (2024).

COUNT III
Violation of Section 501.1737 and FDUTPA by Sonesta Tech

124. The allegations in paragraphs 1 through 107 are incorporated by reference.

125. Sonesta Tech is a “commercial entity” within the meaning of Florida’s age-verification law and subject to regulation under it because Sonesta Tech publishes and distributes Bang Bros content on XVideos.com and XNXX.com, which are websites that contain a substantial portion of material harmful to minors. § 501.1737(1)(b), (e), (j), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).

126. Sonesta Tech has knowingly and intentionally violated Florida’s age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.002(1).

127. Each knowing and intentional violation of Florida’s age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

128. The Court should enjoin Sonesta Tech from continuing to violate Section 501.1737 and FDUTPA.

129. The Court should assess penalties in the amount of up to \$50,000 for each violation in accordance with Section 501.1737(5)(a), Florida Statutes (2024).

130. The Court should assess punitive damages for Sonesta Tech for its “consistent pattern” of publishing and distributing Bang Bros content on XVideos.com and XNXX.com without age verification of users who access that content. § 501.1737(5)(a), Fla. Stat. (2024).

COUNT IV
Violation of Section 501.1737 and FDUTPA by Sonesta Media

131. The allegations in paragraphs 1 through 107 are incorporated by reference.

132. Sonesta Media is a “commercial entity” within the meaning of Florida’s age-verification law and subject to regulation under it because Sonesta Media publishes and distributes Bang Bros content on XVideos.com and XNXX.com, which are websites that contain a substantial portion of material harmful to minors. § 501.1737(1)(b), (e), (j), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).

133. Sonesta Media has knowingly and intentionally violated Florida’s age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.002(1).

134. Each knowing and intentional violation of Florida’s age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

135. The Court should enjoin Sonesta Media from continuing to violate Section 501.1737 and FDUTPA.

136. The Court should assess penalties in the amount of up to \$50,000 for each violation in accordance with Section 501.1737(5)(a), Florida Statutes (2024).

137. The Court should assess punitive damages for Sonesta Media’s “consistent pattern” of publishing and distributing Bang Bros content on XVideos.com and XNXX.com without age verification of users who access that content. § 501.1737(5)(a), Fla. Stat. (2024).

COUNT V
Violation of Section 501.1737 and FDUTPA Sonesta Florida

138. The allegations in paragraphs 1 through 107 are incorporated by reference.

139. Sonesta Florida is a “commercial entity” within the meaning of Florida’s age-verification law and subject to regulation under it because Sonesta Florida publishes and distributes Bang Bros content on XVideos.com and XNXX.com, which are websites that contain a substantial portion of material harmful to minors. § 501.1737(1)(b), (e), (j), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).

140. Sonesta Florida has knowingly and intentionally violated Florida’s age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.002(1).

141. Each knowing and intentional violation of Florida’s age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).

142. The Court should enjoin Sonesta Florida from continuing to violate Section 501.1737 and FDUTPA.

143. The Court should assess penalties in the amount of up to \$50,000 for each violation in accordance with Section 501.1737(5)(a), Florida Statutes (2024).

144. The Court should assess punitive damages for Sonesta Florida’s “consistent pattern” of publishing and distributing Bang Bros content on XVideos.com and XNXX.com without age verification of users who access that content. § 501.1737(5)(a), Fla. Stat. (2024).

COUNT VI
Violation of Section 501.1737 and FDUTPA by GGW Group

145. The allegations in paragraphs 1 through 107 are incorporated by reference.
146. GGW Group is a “commercial entity” within the meaning of Florida’s age-verification law and subject to regulation under it because GGW Group publishes and distributes Girls Gone Wild content on XVideos.com, XNXX.com, and GirlsGoneWild.com, which are websites that contain a substantial portion of material harmful to minors. § 501.1737(1)(b), (e), (j), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).
147. GGW Group has knowingly and intentionally violated Florida’s age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.002(1).
148. Each knowing and intentional violation of Florida’s age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).
149. The Court should enjoin GGW Group from continuing to violate Section 501.1737 and FDUTPA.
150. The Court should assess penalties in the amount of up to \$50,000 for each violation in accordance with Section 501.1737(5)(a), Florida Statutes (2024).
151. The Court should assess punitive damages for GGW Group’s “consistent pattern” of publishing and distributing Girls Gone Wild content on XVideos.com, XNXX.com, and GirlsGoneWild.com without age verification of users who access that content. § 501.1737(5)(a), Fla. Stat. (2024).
152. The Court should order that GGW Group divest ownership of the GirlsGoneWild.com domain name. §§ 501.1737(5)(a), 501.207(3), Fla. Stat. (2024).

COUNT VII
Violation of Section 501.1737 and FDUTPA by GTFLIX

153. The allegations in paragraphs 1 through 107 are incorporated by reference.
154. GTFLIX is a “commercial entity” within the meaning of Florida’s age-verification law and subject to regulation under it because GTFLIX publishes and distributes Girls Gone Wild content on XVideos.com, XNXX.com, and GirlsGoneWild.com, which are websites that contain a substantial portion of material harmful to minors. § 501.1737(1)(b), (e), (j), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).
155. GTFLIX has knowingly and intentionally violated Florida’s age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.002(1).
156. Each knowing and intentional violation of Florida’s age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).
157. The Court should enjoin GTFLIX from continuing to violate Section 501.1737 and FDUTPA.
158. The Court should assess penalties in the amount of up to \$50,000 for each violation in accordance with Section 501.1737(5)(a), Florida Statutes (2024).
159. The Court should assess punitive damages for GTFLIX’s “consistent pattern” of publishing and distributing Girls Gone Wild content on XVideos.com, XNXX.com, and GirlsGoneWild.com without age verification of users who access that content. § 501.1737(5)(a), Fla. Stat. (2024).
160. The Court should order that GTFLIX divest ownership of the GirlsGoneWild.com domain name. §§ 501.1737(5)(a), 501.207(3), Fla. Stat. (2024).

COUNT VIII
Violation of Section 501.1737 and FDUTPA by GGW Florida

161. The allegations in paragraphs 1 through 107 are incorporated by reference.
162. GGW Florida is a “commercial entity” within the meaning of Florida’s age-verification law and subject to regulation under it because GGW Florida publishes and distributes Girls Gone Wild content on XVideos.com, XNXX.com, and GirlsGoneWild.com, which are websites that contain a substantial portion of material harmful to minors. § 501.1737(1)(b), (e), (j), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).
163. GGW Florida has knowingly and intentionally violated Florida’s age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.002(1).
164. Each knowing and intentional violation of Florida’s age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).
165. The Court should enjoin GGW Florida from continuing to violate Section 501.1737 and FDUTPA.
166. The Court should assess penalties in the amount of up to \$50,000 for each violation in accordance with Section 501.1737(5)(a), Florida Statutes.
167. The Court should assess punitive damages for GGW Florida’s “consistent pattern” of publishing and distributing Girls Gone Wild content on XVideos.com, XNXX.com, and GirlsGoneWild.com without age verification of users who access that content. § 501.1737(5)(a), Fla. Stat. (2024).
168. The Court should order that GGW Florida divest ownership of the GirlsGoneWild.com domain name. §§ 501.1737(5)(a), 501.207(3), Fla. Stat. (2024).

COUNT IX
Violation of Section 501.1737 and FDUTPA by Traffic F

169. The allegations in paragraphs 1 through 107 are incorporated by reference.
170. Traffic F is a “commercial entity” within the meaning of Florida’s age-verification law and subject to regulation under it because Traffic F publishes and distributes advertisements that contain material harmful to minors on XVideos.com and XNXX.com, which are websites that contain a substantial portion of material harmful to minors. § 501.1737(1)(b), (e), (j), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.001(2).
171. Traffic F has knowingly and intentionally violated Florida’s age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat. (2024); Fla. Admin. Code R. 2-44.002(1).
172. Each knowing and intentional violation of Florida’s age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. § 501.1737(5)(a), Fla. Stat. (2024).
173. The Court should enjoin Traffic F from continuing to violate Section 501.1737 and FDUTPA.
174. The Court should assess penalties in the amount of up to \$50,000 for each violation in accordance with Section 501.1737(5)(a), Florida Statutes (2024).
175. The Court should assess punitive damages for Traffic F’s “consistent pattern” of publishing and distributing advertisements that contain material harmful to minors on XVideos.com and XNXX.com without age verification of users who access that content. § 501.1737(5)(a), Fla. Stat. (2024).

COUNT X

Civil Conspiracy to Violate Section 501.1737 and FDUTPA by the Pornographers

176. The allegations in paragraphs 1 through 107 are incorporated by reference.
177. The Pornographers engaged in a civil conspiracy to violate Florida's age-verification law and make accessible to minors in Florida material that is harmful to them without age verification.
178. As evidenced by their common ownership, interdependent business models, distribution of their own proprietary content, and shared increased revenues, the Pornographers agreed, conspired, and/or coordinated to publish and distribute content and advertisements containing material harmful to minors on XVideos.com and XNXX.com without verifying the ages of users who access that material as required by Section 501.1737 and FDUTPA.
179. The Pornographers committed overt acts in furtherance of the conspiracy to violate Section 501.1737 and FDUTPA and provided substantial assistance to one another including publishing and distributing material harmful to minors on XVideos.com and XNXX.com, failing to verify the ages of visitors of those sites, sharing geo-locations of visitors for geo-targeted advertisements, and sharing advertising revenue earned from the increased traffic on XVideos.com and XNXX.com.
180. The Pornographers' conspiracy and the overt acts performed in furtherance of the conspiracy are ongoing.
181. The Pornographers acted with a common understanding or design to commit the unlawful acts alleged above and acted purposely, without a reasonable or lawful excuse, to expose minors in Florida to material harmful to them for the Pornographers' financial gain.

182. The Pornographers' conspiracy, together with their acts and omissions in furtherance of the conspiracy, proximately caused and/or substantially contributed to the access by minors in Florida of material harmful to them resulting in harm to their health and well-being in violation of Section 501.1737 and FDUTPA.

TRIAL BY JURY

183. The Attorney General demands a jury trial.

PRAYER FOR RELIEF

Wherefore, the Attorney General requests that the Court:

- A. Enter judgment in favor of the Attorney General and against the Pornographers;
- B. Declare that the Pornographers' actions violate Section 501.1737 and FDUTPA;
- C. Temporarily and permanently enjoin the Pornographers to prevent future violations of Section 501.1737 and FDUTPA;
- D. Award civil penalties, attorney's fees, and costs as authorized by Sections 501.1737(5)(a) and 501.2075, Florida Statutes (2024);
- E. Award punitive damages for the Pornographers' consistent pattern of violations as authorized by Section 501.1737(5)(a), Florida Statutes (2024);
- F. Award any relief to which the Attorney General is entitled under FDUTPA including an order that requires WebGroup, NKL, and Girls Gone Wild to divest ownership of the domain names XVideos.com, XNXX.com, and GirlsGoneWild.com, §§ 501.1737(5)(a), 501.207(3), Fla. Stat. (2024);
- G. Award all measure of damages allowable under statutory and common law, including damages for the harm to the health and well-being of minors in Florida, §§ 501.1737(5)(a), 501.207(3), Fla. Stat. (2024);

H. Grant such other and further legal or equitable relief as justice requires.

Dated: August 4, 2025

Respectfully submitted,

JAMES UTHMEIER
ATTORNEY GENERAL
STATE OF FLORIDA

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