

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN SARASOTA COUNTY, FLORIDA**

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

Plaintiff,

v.

CIVIL DIVISION

CASE NO.:

AYLO HOLDINGS USA CORP.,
AYLO BILLING US CORP.,
AYLO GROUP LTD, AND
NUTAKU ENTERTAINMENT LTD.,

Defendants.

_____ /

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.). Sections 501.1737 and 501.1738 (the “Age Verification Law”) 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. Defendants Aylo Holdings USA Corp, Aylo Billing US Corp, Aylo Group LTD, and Nutaku Entertainment, Ltd (together “Defendants”) operate a variety of websites with pornographic and sexually explicit material that is harmful to minors including, but not limited to, Nutaku.net, SpiceVids.com, PornHub.com, RedTube.com, Tube8.com, and YouPorn.com.

4. SpiceVids.com, PornHub.com, RedTube.com, Tube8.com, and YouPorn.com, for example, offer pornographic content on their websites while Nutaku.net distributes pornographic video game content on its website.

5. Neither SpiceVids.com nor Nutaku.net have any age verification process compliant with Florida law to prevent children from accessing its content.

6. Defendants know that they are subject to Florida’s age verification requirements. However, despite knowing that they must comply with Florida’s age verification law, the Defendants have openly defied this law during the relevant time period.

7. Each day that the Defendants continue to violate Florida’s age verification law, they rack up numerous violations of these provisions and of the Florida Deceptive and Unfair Trade Practices Act (“FDUTPA”), Chapter 501, Part II, Florida Statutes.

8. The Attorney General brings this enforcement action pursuant to FDUTPA to put an end to the Defendants’ blatant violations of Florida law and their 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 Defendants to comply with their obligations under Florida's age verification law, as well as FDUTPA, to stop the unfair, deceptive, and unconscionable business practices that the Defendants 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. 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 public 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.

10. Defendant Aylo Holdings USA Corp. is a for-profit entity incorporated in Delaware with a principal address of 21800 Oxnard Street, Suite 150, Woodland Hills, CA 91367. Through its subsidiaries, it owns and distributes material harmful to minors through the website SpiceVids.com that offers pornographic content and the website Nukatu.net that offers pornographic video game content.

11. Defendant Aylo Billing US Corp is a for-profit entity incorporated in Delaware with a principal address of 21800 Oxnard Street, Suite 150, Woodland Hills, CA 91367 that, upon information and belief, distributes material harmful to minors through SpiceVids.com and Nutaku.net.

12. Defendant Aylo Group LTD. is a for-profit entity incorporated in Cyprus with a principal address of Block 1, 95-197 Old Nicosia-Limassol Road, Dali Industrial Zone 2540, Cyprus that, upon information and belief, distributes material harmful to minors through SpiceVids.com and Nutaku.net.

13. Nutaku Entertainment Ltd. is a for-profit entity incorporated in Cyprus with a principal address of Block 1, 95-197 Old Nicosia-Limassol Road, Dali Industrial Zone 2540, Cyprus that, upon information and belief, distributes material harmful to minors through SpiceVids.com and Nutaku.net.

JURISDICTION AND VENUE

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

15. The Defendants' 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.

16. Venue is proper in this Court because allegations in this Complaint establish that the cause of action accrued at locations across Florida.

17. This Court has personal jurisdiction over the Defendants under Florida's age-verification law, § 501.1737(6), Fla. Stat. and Florida's long-arm statute, § 48.193(1)(a)(1), Fla. Stat., because the Defendants, 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 SpiceVids.com and Nutaku.net, which each contain a substantial portion of material harmful to minors and are accessible in the State of Florida.

18. The conduct described in this Complaint and the harm it causes arise from the Defendants' activities directed to Florida and to SpiceVids.com and Nutaku.com users in Florida.

FACTUAL ALLEGATIONS

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

19. 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.

20. 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.

21. 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.

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

23. “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.

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

25. “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.

26. A “substantial portion” means “more than 33.3 percent of total material on a website or application.” § 501.1737(1)(j), Fla. Stat. “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).

27. “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.

28. “Standard age verification” means “any commercially reasonable method of age verification approved by the commercial entity.” § 501.1737(1)(i), Fla. Stat. “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).

29. “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.

30. Any violation of Florida’s age-verification law “is deemed an unfair and deceptive trade practice” and can be the subject of a FDUTPA enforcement action brought by the Attorney General against a commercial entity. § 501.1737(5)(a), Fla. Stat. 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.

31. 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.

II. Violations of Florida Law

32. Defendants knowingly and intentionally publish or distribute material harmful to minors as defined in Section 501.1737(1)(e), Fla. Stat. through SpiceVids.com and Nutaku.net.

33. More than 33.3 percent of the content on SpiceVids.com and Nutaku.net.com is 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.; Fla. Admin. Code R. 2-44.001(2).

34. Nutaku.net does not require any age verification to access content. On the home page, there are several thumbnails that feature video game characters that look like Anime or Hentai and are in various stages of undress. Some of the characters have their breasts exposed and are in sexually suggestive positions. Some of the games cost money to play while others are free. A few of the free game titles include “Lust Goddess,” “Harem Heroes,” “Aeons Echo,” “Kinky Cats,” and “Horny Legends.”

35. Kinky Cats, for example, has a thumbnail image of a topless woman laying down with her legs spread. The home page for Kinky Cats had three topless women and one woman in a bathing suit across the top of the screen. To the left is a video screen where a user can watch several clips from the game. The clips feature oral sex, anal sex, masturbation, and group sex. On the right appears a link to “Play Free Now.” The link asks a user to create an account, but the site merely requires an email address to create said account and access more content.

36. The Kinky Cats game features a simulated video that made it appear as if a user is waking up to a topless woman sitting on top of the user. The video then has the character expose her vagina and asks the user to touch her. The audio of the game is the sound of a woman moaning in sexual enjoyment. The video goes on to show full penetrative sex before the woman climaxes with an orgasm. The game then requires users to fix up a night club. The home screen shows the interior of the nightclub with a nude girl on the stairs and another nude woman on a couch masturbating. The game encourages the user to text with other girls while being rewarded with images of a sexual nature. The more texting with a character the more perverse the pictures become.

37. Defendants’ publishing or distribution of material through Nutaku.net violates Florida’s Age Verification laws and FDUTPA.

38. SpiceVids.com did not require any age verification to access content. While the website now requires an account and credit card to access the material, SpiceVids.com was non-compliant for at least seven (7) months after Florida's age verification law went into effect as there was no requirement to create an account to view explicit content at least until July 11, 2025.

39. Until at least July 11, 2025, the landing page for SpiceVids.com stated the website contained age-restricted materials and that persons under the age of 18 were not authorized to enter the site. Upon selecting "Enter" the user immediately saw an image of a woman lying on a bed with her breasts exposed. Another woman was lying lower on the bed and appeared to be providing oral sex. As the user scrolled down the site there were thumbnails to several videos. When a thumbnail was hovered over with the cursor clips from the sexually explicit videos were visible. These clips showed sex acts such as oral sex, anal sex, digital penetration, and penis penetration. When a thumbnail was selected a portion of the video was visible for approximately 90 seconds before being asked to subscribe to the service.

40. Defendants' publishing or distribution of material through SpiceVids.com violates Florida's Age Verification laws and FDUTPA.

CAUSE OF ACTION

COUNT I

Violation of Section 501.1737 and FDUTPA by Aylo Holdings USA Corp., Aylo Billing US Corp., Aylo Group Ltd., and Nutaku Entertainment Ltd.

41. All foregoing paragraphs are incorporated by reference.

42. Each Defendant has knowingly and intentionally published or distributed material harmful to minors in violation of Florida's age-verification requirements openly and continuously since the law went into effect. § 501.1737(2), Fla. Stat.; Fla. Admin. Code R. 2-44.002(1).

43. Each violation of Florida's age-verification law constitutes an unfair and deceptive trade practice under FDUTPA. §§ 501.1737(5)(a), 501.204(1), Fla. Stat.

44. The Court should enjoin Defendants from continuing to violate Section 501.1737 and FDUTPA and require each Defendant to comply with Florida's Age Verification laws.

45. 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.

PRAYER FOR RELIEF

Wherefore, the Attorney General requests that the Court:

- A. Enter judgment in favor of the Attorney General and against the Defendants;
- B. Temporarily and permanently enjoin the Defendants to prevent future violations of Section 501.1737 and FDUTPA;
- C. Require that Defendants comply with Florida's Age Verification laws and FDUTPA;
- D. Award civil penalties, attorney's fees, and costs as authorized by Sections 501.1737(5)(a) and 501.2075, Florida Statutes; and
- E. Grant such other and further legal or equitable relief as justice requires.

Dated: September 15, 2025

Respectfully submitted,

JAMES UTHMEIER
ATTORNEY GENERAL
STATE OF FLORIDA

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