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Attorneys for Plaintiffs

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

M.G., H.R., and H.B.,	Case No.:
Plaintiffs,	**COMPLAINT AND PETITION FOR DAMAGES**
vs.	
BEAU C. SCHULTZ, JACKSON T. WEBB, LUCAS R. WEBB, CREATORCORE, LLC, AI MODELFORGE, FAL – FEATURES & LABELS, INC., PHYZIRO, LLC and JOHN DOES 1-50	**(Tier 3)**
Defendants.	

Come now Plaintiffs M.G., H.R., and H.B. by and through their attorneys at Donlon Brand, LLC and Perez Law Group, PLLC, and for their Petition for Damages state as follows:

The Parties

1.   Plaintiff M.G. is a resident of the State of Arizona, County of Maricopa.

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7508 North 59th Avenue
Glendale, Arizona 85301

2.   Plaintiff H.R. is a resident of the State of California, County of San Diego. Upon information and belief, the incidents at the center of this Petition for Damages began while H.R. was a resident of the State of Arizona.

3.   Plaintiff H.B. is a resident of the State of Arizona, County of Maricopa.

4.   Due to the sensitive and sexual nature of the subject matter of this Petition for Damages, Plaintiffs M.G., H.R., and H.B. request this Court permit them to pursue this action under pseudonym to protect them from further harm related to the subject incidents.

5.   Defendant Beau Schultz is a resident of the State of Arizona, County of Maricopa. Defendant Schultz may be served with process at 3018 E. Onyx Avenue, Phoenix, Arizona 85028.

6.   Defendant Jackson Webb is a resident of the State of Arizona, County of Maricopa. Defendant Webb may be served at 2344 E. Mamora Street, Phoenix, Arizona.

7.   Defendant Lucas Webb is a resident of the State of Arizona, County of Maricopa. Defendant Lucas Webb may be served at 2344 E. Mamora Street, Phoenix, Arizona.

8.   Defendant CreatorCore, LLC is a domestic corporation with its principal place of business in the State of Arizona. Defendant CreatorCore may be served through its registered agent, Beau Schultz, at 3018 E. Onyx Avenue, Phoenix, Arizona 85028.

9.   Defendant AI ModelForge is a loose association of individuals or unincorporated corporation comprised of Defendants Webb and Schultz, amongst others, who operate a service held out to the public as AI ModelForge which teaches individuals how to create AI influencers from real, unsuspecting women and girls without their consent, how to create a social media presence on sites such as Instagram, Tiktok and Snapchat to promote their created AI influencers, and how to monetize their AI influencers on sites such as Fanvue. AI ModelForge is made up of several Arizona residents, including Defendants Webb, Schultz, Lucas Webb, and CreatorCore. Defendant AI ModelForge can be served by service upon Defendant Webb or Defendant Schultz.

10.   Defendant FAL – Features & Labels, Inc. [hereinafter "FAL"] is a foreign corporation duly organized under the laws of the State of Delaware. Defendant FAL has its principal place of business in California, and may be served through its registered agent at Legalinc Corporate Services, Inc., 131 Continental Drive, Suite 305, Newark, Delaware 19713.

11.   Defendant Phyziro, LLC [hereinafter "Phyziro"] is a foreign corporation duly organized under the laws of the State of Texas. Defendant Phyziro has its principal place of business in Texas and may be served through its registered agent, Rickey Hargrove, Jr. at 7638 Touchstone Houston, Texas 77028.

12.   Defendant John Doe 1 is an unknown individual believed to be named Elijah Lynch [hereinafter John Doe 1 – Lynch]. Upon information and belief, Defendant John Doe 1 – Lynch individually operates several social media accounts which have been used to post Plaintiffs' images in furtherance of Defendants Schultz, Webb, AI ModelForge, and CreatorCore's business in Arizona. Upon information and belief, these accounts include Instagram accounts: elijahlynch12, Elijah.run, creatorcore.elijahh, Elijah.creatorcore, creatorcoreelijah, aicore.elijah, creatorcoreaii, aii.elijah, and ai.elii; and WHOP account: Elijah L.

13.   Defendant John Doe 2 is an unknown individual believed to be named Noah [hereinafter John Doe 2 – Noah]. Upon information and belief, Defendant John Doe 2 – Noah individually operates several social media accounts which have been used to post Plaintiffs' images in furtherance of Defendants Webb, Schultz, AI ModelForge, and CreatorCore's business in Arizona. Upon information and belief, these accounts include Instagram accounts: noxh.now, noxh_ai, ai.noxhh; and Discord account: burns.no.

14.   Defendant John Doe 3 is an unknown individual believed to be named Isaac [hereinafter John Doe 3 – Isaac]. Upon information and belief, Defendant John Doe 3 – Isaac is a web designer and/or coding specialist who has been personally and individually involved in the creation of CreatorCore. Upon information and belief, Defendant John Doe 3 – Isaac was personally and individually involved in ensuring CreatorCore possessed and maintained NSFW

1   capabilities for the generation of nude and NSFW images and videos of unsuspecting women

2   and girls.

3   15.   John Doe 4 is an unknown generative AI model hosted by Defendant FAL and

4   used by Defendant CreatorCore in the AI generation of NSFW and nude images and videos of

5   unsuspecting women and girls. Upon information and belief, Defendant John Doe 4 has

6   designed, manufactured and sold the "Bytedance" generative AI model hosted by Defendant

7   FAL and provided to CreatorCore by Defendant FAL [hereinafter "John Doe 4 – Bytedance"].

8   16.   John Doe 5 is an unknown generative AI model hosted by Defendant FAL and

9   used by Defendant CreatorCore in the AI generation of NSFW and nude images and videos of

10   unsuspecting women and girls. Upon information and belief, Defendant John Doe 5 has

11   designed, manufactured and sold the "WAN" generative AI model hosted by Defendant FAL

12   and provided to CreatorCore by Defendant FAL [hereinafter "John Doe 5 – WAN"].

13   17.   Regarding John Doe 4 – Bytedance and John Doe 5 – WAN, Plaintiffs are unable

14   to discern at this time if these are simply names provided by Defendant FAL to their AI models,

15   or if the AI models named Bytedance and WAN on the fal.ai website are operated by

16   ByteDance, LTD, ByteDance Inc., Alibaba Group Holding Limited, and/or Alibaba Group

17   (U.S.) Inc. Because all generations through CreatorCore are generated and hosted on an FAL

18   URL, v3b.fal.media, the actual generative AI models used to generate images and videos of

19   unsuspecting women and girls through CreatorCore, including NSFW and nude images and

20   videos, is not yet known.

21   18.   John Does 6-50 are unknown individuals and entities who have committed torts

22   harming Plaintiffs through use of Defendant Schultz, Defendant Webb, Defendant CreatorCore,

23   and Defendant FAL's generative AI models, using Plaintiffs' images to generate pornographic

24   images of Plaintiffs or otherwise used Plaintiffs' images through Defendants Schultz, Webb,

25   CreatorCore, and FAL's generative AI models to profit. These individuals and entities include,

26   but are not limited to, the owners of the following online accounts:

27

-4-

- Instagram Handles: Elijah.run, creatorcore.elijahh, Elijah.creatorcore, creatorcoreelijah, aicore.elijah, creatorcoreaii, aii.elijah, ai.elii, noxh.ai, noxh.now, ai.noxhh, alex._ai._, ai.matty, AI.model.method, pimpai7x, ai.juni0r, aicashmommy, _matty_ai, matt.nowai, joy.aiofm, creator.no, and ai.sxmuel.

- Tiktok Handles: creatorcoremedia, ai.modelmethod, modelforge, ellsbunni, dani.ai.agency, only.baddies.ai

- WHOP Users: Elijah L, CJ Washington, Lucas, Rhinopilled, Jordan Rezek.

19.   John Does 6-50 also include individuals and entities who have used, through Defendants Schultz, Webb, AI ModelForge, CreatorCore and FAL's generative AI models, Plaintiffs' images to generate nude, NSFW, pornographic, or other images of Plaintiffs, or otherwise have used Plaintiffs' images, through Defendants Schultz, Webb, AI ModelForge, CreatorCore, and FAL's generative AI models to profit of Plaintiffs images. This includes, but is not limited to, users of Defendant CreatorCore's subscription service, users of Defendant AI ModelForge's subscription service, and subscribers to Defendants' Telegram Channel, Discord Server, or WHOP Channel.

20.   John Does 6-50 also include individuals who created and operated accounts on various websites, including, but not limited to, Instagram, Tiktok, Snapchat, Twitter, Fanvue, and Fansly using Plaintiffs' images and Defendant CreatorCore's generative AI for their own personal financial gain and personal pleasure.

21.   John Does 6-50 also include various generative AI models, produced to Defendants Webb, Schultz, and CreatorCore by Defendant FAL, which provided the background AI services for Defendants Webb, Schultz, CreatorCore, and FAL's generative AI.

Jurisdiction and Venue

22.   Defendant Schultz is an individual resident of the State of Arizona. Defendant Schultz may be served at 3018 E. Onyx Avenue, Phoenix, Arizona 85028. This Court has both general and specific personal jurisdiction over Defendant Schultz as he is an Arizona resident who has committed torts forming the basis of this lawsuit in Arizona.

23. Defendant Webb is an individual resident of the State of Arizona. Defendant Webb may be served at 2344 E. Mamora Street, Phoenix, Arizona. This Court has both general and specific personal jurisdiction over Defendant Webb as he is an Arizona resident who has committed torts forming the basis of this lawsuit in Arizona.

24. Defendant Lucas Webb is an individual resident of the State of Arizona. Defendant Lucas Webb may be served at 2344 E. Mamora Street, Phoenix, Arizona. This Court has both general and specific personal jurisdiction over Defendant Lucas Webb as he is an Arizona resident who has committed torts forming the basis of this lawsuit in Arizona.

25. Defendant AI ModelForge is a loose association of individuals or unincorporated corporation operating a business in Arizona for the purpose of teaching other individuals how to monetize AI influencers created through Defendant CreatorCore's platform from unsuspecting women and girls. Defendant AI ModelForge is primarily comprised of Arizona residents including Defendants Webb and Schultz, and the corporate Defendant, CreatorCore. This Court has both general and specific jurisdiction over Defendant AI ModelForge as it is comprised of Arizona residents, and committed torts against the Plaintiffs in Arizona through generation of AI likenesses of Plaintiffs and using those AI likenesses to drive business to Defendants Webb, Schultz, AI ModelForge, and CreatorCore. Defendant AI ModelForge operates on several platforms, including Instagram, Tiktok, X (formerly known as Twitter), WHOP, Discord, Skool, and Telegram to attract new individuals to use AI ModelForge and CreatorCore's generative AI.

26. Defendant John Doe 1 - Lynch is a United States citizen of unknown residence. This Court has personal jurisdiction over Defendant John Doe 1 - Lynch as he has committed torts forming the basis of this lawsuit in Arizona by using the likenesses of Arizona women to generate AI images and videos, including pornographic images and videos using an Arizona based company's software, and has profited from using the likenesses of the Plaintiffs. Plaintiffs have suffered harm in the State of Arizona as a result of Defendant John Doe 1 – Lynch's conduct. Further, Defendant John Doe 1 – Lynch is a subscriber to Defendants AI ModelForge

1   and CreatorCore's platforms and related chats, contracting with Defendant CreatorCore to use

2   their generative AI technology to create and operate AI models. The CreatorCore AI software

3   subscription requires an agreement to be bound by Arizona law. Defendant John Doe 1 – Lynch

4   has used Defendant CreatorCore's generative AI and Plaintiffs' images on his personal social

5   media accounts causing harm to Plaintiffs in Arizona.

6   27.   Defendant John Doe 2 - Noah is a United States citizen of unknown residence.

7   This Court has personal jurisdiction over Defendant John Doe 2 - Noah as he has committed

8   torts forming the basis of this lawsuit in Arizona by using the likenesses of Arizona women to

9   generate AI images and videos, including pornographic images and videos using an Arizona

10   based company's software, and has profited from using the likenesses of the Plaintiffs. Plaintiffs

11   have suffered harm in the State of Arizona as a result of Defendant John Doe 2 – Noah's

12   conduct. Further, Defendant John Doe 2 – Noah is a subscriber to Defendants AI ModelForge

13   and CreatorCore's platforms and related chats, contracting with Defendant CreatorCore to use

14   their generative AI technology to create and operate AI models. The CreatorCore AI software

15   subscription requires an agreement to be bound by Arizona law. Defendant John Doe 2 – Noah

16   has used Defendant CreatorCore's generative AI and Plaintiffs' images on his personal social

17   media accounts causing harm to Plaintiffs in Arizona.

18   28.   Defendant John Doe 3 - Isaac is a citizen of unknown residence. This Court has

19   personal jurisdiction over Defendant John Doe 3 - Isaac as he has committed torts forming the

20   basis of this lawsuit in Arizona by negligently designing and manufacturing CreatorCore in

21   Arizona for an Arizona company using the likenesses of Arizona women to generate AI images

22   and videos, including pornographic images and videos. Plaintiffs have suffered harm in the

23   State of Arizona as a result of Defendant John Doe 3 – Isaac's conduct. The CreatorCore AI

24   software subscription requires an agreement to be bound by Arizona law. Defendant John Doe

25   3 – Isaac designed and manufactured CreatorCore for an Arizona company, CreatorCore. Upon

26   information and belief, Defendant John Doe 3 – Isaac, is not an employee of Defendant

27

1 CreatorCore and would be independently liable for his negligent design and manufacture of

2 CreatorCore.

3   29.   Defendant CreatorCore is an Arizona limited liability company with all members

4 being residents of the State of Arizona. Defendant CreatorCore is registered to do business in

5 Arizona and has its principal place of business in Arizona. This Court has general and specific

6 personal jurisdiction over Defendant CreatorCore as it is an Arizona corporation which

7 committed torts forming the basis of this lawsuit in Arizona.

8   30.   Defendant FAL is a corporation registered to do business in the State of Delaware

9 with its principal place of business in California. Defendant FAL's nerve center is in California.

10 This Court has personal jurisdiction over Defendant FAL as it has committed torts against

11 Arizona residents in the State of Arizona.

12   31.   Defendant CreatorCore's AI platform is hosted by Defendant FAL's generative

13 AI models. Upon information and belief, Defendant FAL has contracted with Defendant

14 CreatorCore to allow Defendant CreatorCore to run its CreatorCore AI platform on Defendant

15 FAL's generative AI platforms in Arizona. Defendant FAL accepts payments from Defendant

16 CreatorCore in Arizona, as well as Defendants Schultz and Webb in Arizona, for each AI

17 influencer generated through CreatorCore (1000+ in the last week) and for each image and

18 video generated through CreatorCore (500,000 every 30 days). Defendant FAL has provided

19 and continues to provide Defendant CreatorCore and its users the hosting generative AI models

20 necessary to generate AI nude images/videos and AI influencers from the likenesses of

21 unsuspecting women and girls, including Arizona residents. Defendant FAL has designed,

22 manufactured, and sold defectively dangerous products in its generative AI models, which it

23 specifically delivered to Arizona for Defendants Schultz, Webb, and CreatorCore's subscribers'

24 use to the harm and detriment of unsuspecting women and girls, including Arizona residents,

25 such as Plaintiffs. Further, Defendant FAL has committed torts in the State of Arizona which

26 have harmed Arizona residents in Arizona. Defendants Schultz, Webb, and CreatorCore

27 specifically chose Defendant FAL's generative AI models to host their AI influencer generation

platform in Arizona due to the lack of safeguards preventing generation of nude and/or pornographic images and videos of unsuspecting women.

32.   Through the sale and delivery of Defendant FAL's generative AI models to Defendant CreatorCore and its subscribers in Arizona, Defendant FAL has sufficient minimum contacts with the State of Arizona to anticipate being hailed into Court in Arizona. Further, Defendant FAL's generative AI models are the subject of this litigation, and were used by an Arizona company in Arizona to harm the Plaintiffs in Arizona. As such, this suit arises from Defendant FAL's direct contacts with the State of Arizona, conferring personal jurisdiction over Defendant FAL on this Court.

33.   As used in this Petition for Damages Not Safe for Work [hereinafter "NSFW"] images and videos refer to images and videos which are explicit containing nudity, pornography, sexual content, fetish content, and other explicit content.

⚠ CRITICAL INFORMATION

Where it is: In the "Content Type" section of image generation settings

Two Options:

- SFW = Safe for work (clothed, appropriate)
- NSFW = Not safe for work (nude, explicit)

34.   Defendant Phyziro is a foreign limited liability company formed under the laws of the State of Texas and with its principal place of business in Texas. This Court has specific personal jurisdiction over Defendant Phyziro as it conducted business in the State of Arizona and such business is the subject of this lawsuit.

35.   In the summer of 2025 Defendants Webb, Schultz, and CreatorCore were using Stripe to process payments for Defendant CreatorCore's generative AI platform. Upon information and belief, once Defendant CreatorCore reached a certain threshold of transactions processed, Stripe examined Defendant CreatorCore's business further. During this evaluation, Stripe determined Defendant CreatorCore was using generative AI to create AI influencers using real women and girls. Stripe also learned Defendant CreatorCore's generative AI allowed

1   users to create NSFW images and videos of unsuspecting women. Upon learning about the

2   NSFW generation, Stripe advised Defendants Webb, Schultz, and CreatorCore that Stripe

3   would no longer process payments for Defendant CreatorCore if Defendant CreatorCore

4   permitted NSFW AI generations of unsuspecting women and girls.

5   36.   In the summer of 2025, this decision by Stripe left Defendants Webb, Schultz,

6   and CreatorCore with two options: remove NSFW generation capability from CreatorCore or

7   change payment processors. Defendants Webb, Schultz and CreatorCore chose to change

8   payment processors rather than remove NSFW image and video generation. This decision to

9   leave to maintain NSFW generations on CreatorCore cost Defendants Webb, Schultz, and

10   CreatorCore $150,000.00. Defendants Webb, Schultz, and CreatorCore could've just deleted

11   NSFW and kept the $150,000.00 on Stripe, but it would ruin all content for Fanvue, so they

12   burned their Stripe account and lit $150,000.00 on fire.

13   37.   Defendants Webb, Schultz, and CreatorCore initiated a search for a new payment

14   processor for Defendant CreatorCore. Defendants Webb, Schultz, and CreatorCore were

15   refused by ten separate payment processors who would not process payments for Defendant

16   CreatorCore so long as the platform maintained generative NSFW capabilities. Defendant

17   Webb, Schultz, and CreatorCore's business was refused by ten separate payment processors

18   due to Defendant CreatorCore's capability and endorsement of NSFW generations of

19   unsuspecting women and girls.

20   38.   Defendants Webb, Schultz and CreatorCore relentlessly tried to find someone

21   that would allow payment processing for NSFW generative AI. Defendants Webb, Schultz and

22   CreatorCore ensured NSFW would be going nowhere on Defendant CreatorCore's platform by

23   finding a payment processor who would allow it.

24   39.   After learning no one likes processing NSFW due to high risk and legal issues

25   Defendants Webb, Schultz and CreatorCore located a new processor which was high risk and

26   allowed them to continue with NSFW generation, Defendant Phyziro.

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40. Defendant Phyziro contracted/entered into a business relationship in Arizona with Defendants Webb, Schultz and CreatorCore to perform payment processing services for Defendant CreatorCore's generative AI platform in Arizona. Upon information and belief, Defendant Phyziro ran "know your client" and background checks of Defendants Webb, Schultz and CreatorCore. Because of these checks, Defendant Phyziro knew it was contracting with Arizona individuals and entities to provide payment processing services in Arizona for an Arizona business. Defendant Phyziro was intentionally doing business in Arizona with Defendants Webb, Schultz, and CreatorCore. Defendant Phyziro knew Defendant CreatorCore was platforming generative AI with the capability of removing women and girls' clothing and creating NSFW images and videos of unsuspecting women and girls at the time they entered into a business/contractual relationship with Defendants Webb, Schultz and CreatorCore.

41. To use Defendants' CreatorCore platform, users must pay for access to the platform and for credits which are used to generate AI influencers, images, videos, and NSFW content of said AI influencers. Defendant Phyziro has contracted in Arizona to perform payment processing services for Defendants' CreatorCore generative AI platform, processing payments for subscriptions and credits allowing users of CreatorCore to generate AI influencers, images, videos, and NSFW content of unsuspecting women and girls in Arizona. Defendants Webb, Schultz and CreatorCore were rejected by over ten payment processors as Defendants refused to remove NSFW capabilities from their CreatorCore AI platform. Defendant Phyziro accepted Defendant CreatorCore's business with NSFW generative AI capabilities, and agreed to process payments for Defendants' CreatorCore to allow the individual defendants and Defendant CreatorCore's users to generate NSFW images and videos of unsuspecting women, including Plaintiffs.

42. But for Defendant Phyziro's agreement to process payments for NSFW images and videos of unsuspecting women and girls in Arizona, Defendants' CreatorCore business would have been forced to discontinue NSFW image generation as it could not have been profitable, and as such, Defendant Phyziro's agreement to process payments for NSFW image

1   and video generation facilitated the same. Phyziro knew it was providing payment processing

2   services for NSFW image and video AI generation in Arizona and chose to move forward with

3   the business relationship with Defendants.

4   43.   This suit arises directly from Defendant Phyziro's business connections with the

5   State of Arizona in that Plaintiffs were harmed when Defendants and users of Defendants'

6   CreatorCore platform used its generative AI to generate AI influencers from Plaintiffs' images

7   and created NSFW images of Plaintiffs using Defendants' CreatorCore platform. Defendant

8   Phyziro provided payment processing services in Arizona to an Arizona company and Arizona

9   individuals for the use of Plaintiffs' images to generate AI influencers and NSFW images and

10 videos of Plaintiffs for the profit of Defendants. This Court has specific personal jurisdiction

11 over Defendant Phyziro.

12   44.   Throughout this Petition for Damages, the "ModelForge Defendants" refers to

13 the group of Defendants Webb, Schultz, Lucas Webb, John Doe 2 – Noah, AI ModelForge and

14 CreatorCore.

15   45.   This Petition for Damages seeks all damages recoverable by the law in excess of

16 the jurisdictional amount established for filing of the action in this Court.

17   **SUMMARY OF FACTS**

18   46.   Plaintiffs M.G., H.R., and H.B. are each attractive young women in their early

19 20's previously with popular Instagram accounts which they used to post photographs of

20 themselves in their daily lives. In July of 2025, Plaintiffs learned AI images of Plaintiffs were

21 being used by men online to advertise for their "AI influencer" business. Videos involving the

22 AI generated sexually suggestive likenesses of Plaintiffs have garnered millions of views on

23 Instagram and TikTok, including **one single video** on Instagram with in excess of 16,000,000

24 views.

25   47.   Upon learning of their likenesses being used, Plaintiffs requested Instagram

26 remove the posts and the accounts profiting from their likenesses. On November 6, 2025,

27

Instagram very briefly suspended an account of Defendant Schultz, but the account was restored within hours with the posts of Plaintiffs still present.

48. Plaintiffs are three of thousands of unsuspecting women and girls who have been affected by this scheme perpetrated by Defendants and their subscribers in furtherance of their desire to remove the clothing from unsuspecting women and girls and to destroy the autonomy of these unsuspecting women and girls.

49. For over three years, Defendants Webb and Schultz have been scraping images of unsuspecting women and girls off various social media sites, predominantly Instagram, to generate indistinguishable AI copies of unsuspecting women and girls. Defendants Webb and Schultz then monetized the indistinguishable AI copies of unsuspecting women and girls through social media traffic and subscription porn sites. Defendants Webb and Schultz monetized these unsuspecting women and girls, including Plaintiffs, by stealing their images off social media without their consent and generating highly provocative sexualized content of their indistinguishable AI copies to drive traffic to social media profiles of these unsuspecting women and girls. Defendants Webb and Schultz then used generative AI to remove clothing from their indistinguishable AI copies of unsuspecting women and girls, including Plaintiffs, to generate nude sexual content to put behind subscription paywalls on pornographic sites such as Fanvue.

50. Defendants Webb and Schultz monetized these unsuspecting women and girls in a couple of different manners.

      a. Defendants Webb and Schultz would monetize these unsuspecting women and girls by using their indistinguishable AI copies to drive traffic to social media posts, monetizing the social media traffic. They would drive this traffic through use of provocative and seductive images and videos of the indistinguishable AI copies of the unsuspecting women and girls along with sexually suggestive captions. A single Instagram post generated over 16,000,000 views in just over a month, generating over $50,000.00 in income.

b. Defendants Webb and Schultz monetized these unsuspecting women and girls by setting up subscription porn sites hosted by platforms such as Fanvue depicting the indistinguishable AI copies of the women and girls in NSFW and sexual content. The previously mentioned social media accounts would link to these subscription porn sites of the indistinguishable AI copies of unsuspecting women and girls, including Plaintiffs, allowing sexually stimulated men and boys who were fed the provocative social media material to click a link and have immediate access to nude and sexual images and videos of the unsuspecting woman or girl's indistinguishable AI copy with the payment of a subscription fee. Defendants Webb and Schultz prey on sexually stimulated men and boys subscribing to the site to see more of the unsuspecting women and girls, such as Plaintiffs, and forgetting to unsubscribe.

c. Defendants Webb and Schultz monetized unsuspecting women and girls by making sexually stimulated men and boys believe they have an actual relationship with these unsuspecting women and girls. After luring sexually aroused men and boys from the social media accounts to the Fanvue account for the indistinguishable AI copies of unsuspecting women and girls, the sexually aroused men would receive AI automated messages purporting to be from the real woman or girl upon subscribing. Defendants Webb, Schultz, or their chatbot, would send salacious and erotic messages attempting to lure the sexually stimulated man or boy into wanting more sexual content from the AI copy of unsuspecting women and girls. Defendants Webb and/or Schultz would use generative AI to create sexual images and/or videos of the unsuspecting woman or girl to put behind a substantial paywall in the chat for the sexually aroused customer to purchase. At times, this chat conversation would evolve into the sexually aroused customers requesting specific content, including fetish content, from the indistinguishable AI copies of unsuspecting women or girls. Defendants

Webb and/or Schultz would create this requested sexual content using generative AI, placing it behind a substantial paywall in the chat for purchase by the sexually aroused customer. Defendants Webb and Schultz profited substantially from individual subscribers in these chats and from "tips" directed to their indistinguishable AI copies of unsuspecting women and girls. Occasionally individual users spent thousands of dollars, including some users who spent over $10,000.00, on the indistinguishable AI copies of unsuspecting women and girls.

d. Upon information and belief, Defendants Webb and Schultz used Plaintiffs in this monetization scheme prior to the introduction of AI ModelForge and CreatorCore.

AiModelForge

creatorcore

🌐 Public   👥 31 members   🏷️ $48/month

AI Model Forge – The #1 community for building & scaling AI influencers to $10K/month.
Founded by Jack, Beau & Noah – the team behind $4M+ collected and 500+ clients over 6 years in the AI model space.
What's Inside: 🔥 Complete A-Z system: Build, launch & scale from $0 to $10K+/mo 🛠️ Our exact tech stack, templates & automation tools 💬 Weekly calls + direct access to our team 📈 Proven scripts, SOPs & anti-ban protocols
This is for you if: ✅ You want a cash-flowing digital asset without showing your face ✅ You want mentorship from a team with real 7-figure results
Not for you if: ❌ You want get-rich-quick schemes ❌ You're not willing to put in the work
We've helped beginners hit $5K/mo in 90 days. The system works—if you do.
Join 500+ members building the future of digital influence.

51. After years of monetizing unsuspecting women and girls with their indistinguishable AI copies, Defendants Webb and Schultz chose to capitalize on these unsuspecting women and girls in a different manner in addition to the above.

52. The ModelForge Defendants drafted and created "Blueprints" to sell to individuals teaching them Defendants Webb and Schultz's program to monetize unsuspecting women and girls using generative AI. These "Blueprints" laid out the entire strategy from stealing an unsuspecting woman or girl's photos from social media to using generative AI to create indistinguishable AI copies of women or girls to monetizing them on social media and pornographic subscription sites, such as Fanvue. This facilitated tens of thousands of individuals adopting the business model, stealing images of unsuspecting women and girls to create indistinguishable AI copies of them in an attempt to capitalize off the unsuspecting women and girls' likenesses. With the AI ModelForge "Blueprints," the ModelForge Defendants created a vast web of predators preying upon unsuspecting women and girls for their own profit and the profit of the ModelForge Defendants. Subscribers to the "Blueprints," which are hosted on WHOP and Skool, pay either $24.95 a month or a one-time fee of $69.97 on WHOP or $48/month on Skool. Upon information and belief, thousands of subscribers have purchased these "Blueprints" worldwide.

53. The ModelForge Defendants further monetized this plan by creating Defendant CreatorCore. Defendant CreatorCore is a generative AI platform created by Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore which runs on a host AI and exists solely for the purpose of generating indistinguishable AI copies of unsuspecting women and girls. Defendant CreatorCore has the capability to disrobe women, even when only clothed images of the unsuspecting women and girls have been inputted to the platform. Defendant CreatorCore can and does generate NSFW images and videos of indistinguishable AI copies of unsuspecting women and girls stolen from the internet.

54. Defendant CreatorCore is a subscription service which provides a subscriber monthly credits based upon the amount they have paid. These include monthly plans for $29.95

a month (no NSFW generations), $59.99 a month (includes NSFW generations), or $129.99 a month (includes NSFW generations). The credits are used on the platform to generate AI influencers, which are indistinguishable AI copies of unsuspecting women and girls. In seconds, with little to no skill, subscribers can use the credits to generate nude images and videos of the AI influencers they have generated from unsuspecting women and girls. The ModelForge Defendants' "Blueprints" direct subscribers to CreatorCore and specifically describe how to use CreatorCore to monetize unsuspecting women and girls. Further, the ModelForge Defendants provide technical support services through various chats with subscribers including WHOP, Discord, and Telegram to help subscribers with any difficulties in generating nude images and videos of unsuspecting women and girls.

55.   Upon the creation of Defendant CreatorCore and the AI ModelForge "Blueprints," the ModelForge Defendants were now profiting from their harem of indistinguishable AI copies of unsuspecting women and girls; but also profiting from selling instructions to predators seeking to prey on their own unsuspecting women and girls as well as the tools to generate NSFW images and videos of unsuspecting women and girls selected by the subscribers.

56.   As of August 2, 2025, Defendant CreatorCore had over 8,000 subscribers who had generated over 500,000 images and videos from 20,000+ unsuspecting women and girls, including Plaintiffs. Those numbers have increased substantially since August 2, 2025, as Defendant CreatorCore now claims 1000+ AI influencers are generated weekly on their platform.
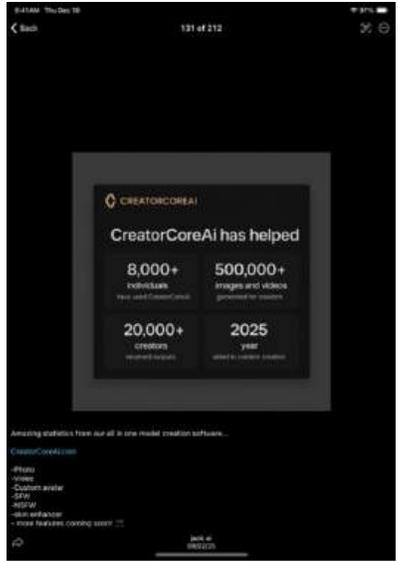
57.   The ModelForge Defendants' strategy to profit off unsuspecting women and girls now includes advertising using social media images and videos of the indistinguishable AI copies of the attractive unsuspecting women and girls clipped with images and videos of the ModelForge Defendants' lavish lifestyles, including private jets, Lamborghini's, and exotic locations to sell their "Blueprints" and CreatorCore as a system for predatory men to get rich off the backs of unsuspecting women and girls. Plaintiffs are used heavily as the face of AI ModelForge and CreatorCore by Defendants. These social media posts include messages like "You built her in 20 minutes and she made you 13.2k in the first 45 days;" "Men pay my AI model $470 a day and all I did was create her in 22 minutes;" "It took me 30 minutes to create an AI girl and never have to work again….(she made me 199k in 3 months);" "I built her in 21

minutes and she had 16,890 men spend $11.99 on her. You do the math;" "I built her in 22 minutes and she had 2017 men spend $11.99 this month. She's not even real;" "She's not real but the money is. $9.99 x 15,789 men. You do the marh [*sic*];" "I built her in 20 minutes and she made me $4780 in her first month. She's not even real. It's AI;" "You found the most unethical way to make money online;" "All it took was 19,322 men paying $9.99 (I don't even talk to them the AI girl does);" "She's not my girlfriend. She's my best paid employee;" "Men pay my AI model $467 a day and all I did was create her in 22 minutes;" and "POV: You made an AI girl for fun and she printed $179k."
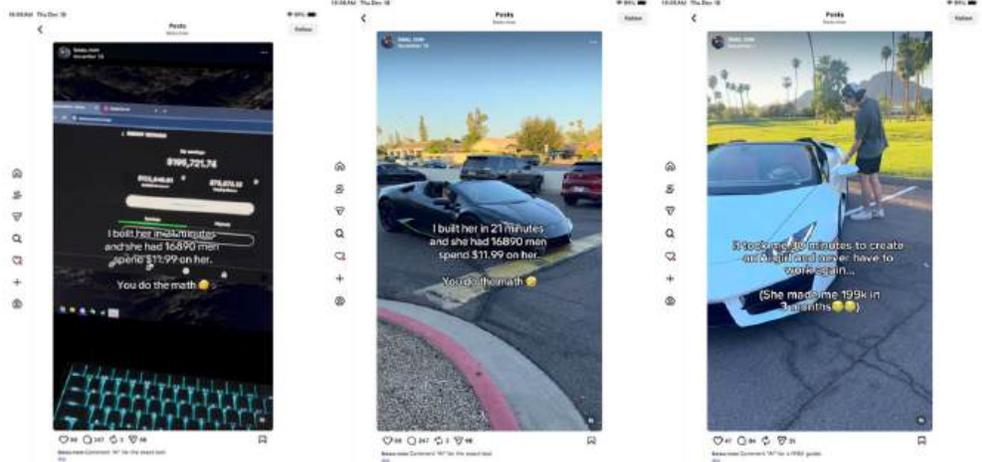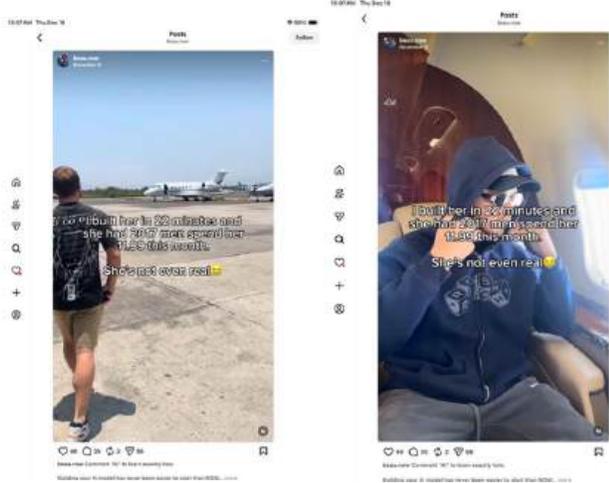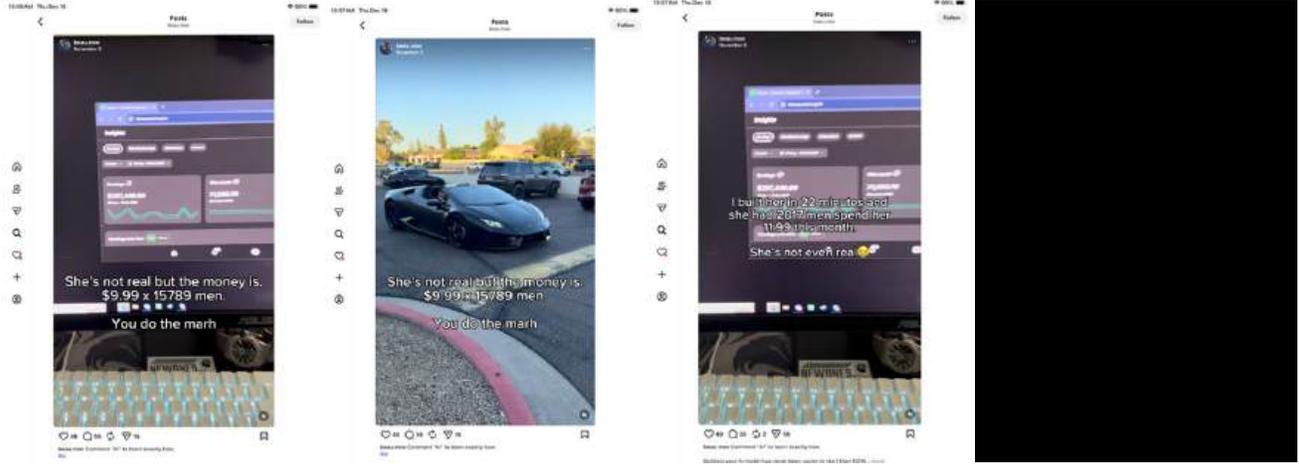
[Throughout this Petition, the faces of unsuspecting women and girls not parties to this lawsuit have been redacted, even in the sealed filing]

58.   Each of these images were taken from a single social media account, beau.now on Instagram, but there are 50+ accounts spreading the ModelForge Defendants' advertising for AI ModelForge "Blueprints" and CreatorCore using this same model and method, and same women, including Plaintiffs. This is how the ModelForge Defendants are spreading the web of predators using their "Blueprints" and CreatorCore to generate indistinguishable AI copies of unsuspecting women and girls for profit. Other social media accounts spreading these messages on behalf of the ModelForge Defendants include accounts managed by Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, John Does 6-50, AI ModelForge, and CreatorCore.

59.   The ModelForge Defendants know their actions forming the basis for this lawsuit are wrong, but continue them strictly for financial benefit. This is indicated within their own social media posts, wherein they state they have found the most unethical way to make money online and that they know what they're doing is illegal. However, it's also shown in their actions elsewhere. The ModelForge Defendants were rejected by their payment processor because their business facilitated NSFW generations of unsuspecting women and girls. The ModelForge Defendants were subsequently turned down by ten other payment processors for refusing to eliminate the capability of NSFW AI generations of unsuspecting women and girls from CreatorCore. The ModelForge Defendants refusal to remove NSFW generative AI capabilities, cost them $150,000.00. The ModelForge Defendants took this financial hit because they knew it would be more profitable to keep NSFW generative AI capabilities for CreatorCore and its predatory subscribers.

60.   Defendant FAL provided generative AI models with NSFW image and video generative capabilities to the CreatorCore platform. When a NSFW image is generated on CreatorCore, it is hosted with an FAL URL, v3.fal.media or similar. The ModelForge Defendants specifically chose to build their platform with Defendant FAL's generative AI models because they do not have guardrails protecting against the creation of NSFW images or videos of unsuspecting women and girls without their consent.

61.   Upon information and belief, Defendant FAL uses Defendant John Doe 4 – ByteDance and Defendant John Doe 5 – WAN for generative AI for developers' integration.

62.   Defendant Phyziro is the payment processor for the ModelForge Defendants. The ModelForge Defendants were rejected by over ten payment processors because those payment processing companies refused to process payments for companies which were facilitating the use of generative AI to create NSFW images and videos of unsuspecting women and girls without their consent. Defendant Phyziro, knowing the ModelForge Defendants were providing a how-to Blueprint and the tools to create nude images and videos of unsuspecting women and girls without their consent, and knowing the ModelForge Defendants had been rejected by 10+

1 payment processing companies for this very reason, chose to look the other way regarding the

2 ModelForge Defendants' business and agreed to process payments for the ModelForge

3 Defendants' businesses. During the time the ModelForge Defendants sought a payment

4 processor, while being rejected by over ten payment processors, CreatorCore and its NSFW

5 image and video generations were shut down and no NSFW images or videos were generated

6 through CreatorCore during this time. Defendant Phyziro knew this was wrong and harmful to

7 the innocent women and girls involved but chose profit over doing what was right.

8   63.   Because of their business arrangement with Defendant FAL, the ModelForge

9 Defendants would lose money on generations while they did not have a payment processor,

10 which is why CreatorCore was shut down during the payment processor search.

FACTUAL ALLEGATIONS

12   64.   Plaintiffs M.G., H.R., and H.B. are three attractive young women all of whom

13 worked at one point or another over the past 3+ years in hospitality in the greater Phoenix area.

14 As a part of this work, Plaintiffs were asked to maintain a social media presence to help drive

15 traffic to the establishments at which they worked.

16   65.   For the past three years, Defendants Webb and Schultz have been using

17 unsuspecting women and girls to create AI influencers of whom they have then created social

18 media profiles on platforms such as Instagram and Tiktok.

19   66.   Within this *Petition for Damages* "AI influencer' means an indistinguishable AI

20 copy of an unsuspecting woman or girl which has been created using images of that

21 unsuspecting woman or girl through a generative AI model or platform.

22   67.   Once an AI influencer has been created Defendants' generative AI models and

23 platforms can be used to create photos and videos of that AI influencer based upon prompts

24 provided to the generative AI model. This includes nude, NSFW, pornographic, or otherwise

25 sexually explicit images and/or videos of the AI influencer.

26   68.   Defendants Webb and Schultz's method for creating AI influencers consisted of

27 finding unsuspecting women and girls on social media, including Plaintiffs, and downloading

their images from social media sites. Defendants Webb and Schultz specifically preyed on attractive women and girls who had a significant social media following, but avoided women and girls with a following which was too large to avoid detection by the unsuspecting women and girls.

69. Prior to 2025, Defendants Webb and Schultz would then use an unknown generative AI model to create AI influencers using the images downloaded from the unsuspecting women and girls' social media accounts. Once Defendants Webb and Schultz had their AI influencers generated from images unsuspecting women and girls, they would generate AI images and videos of the unsuspecting women and girls to use in their monetization scheme.

70. Defendants Webb and Schultz specifically and intentionally used women from social media to generate AI influencers who were indistinguishable AI copies of the unsuspecting women and girls so the AI influencers appeared consistent to avoid detection by consumers that the images and videos were AI and not the real women. The images and videos generated by Defendants Webb and Schultz through use of generative AI of their AI influencers are virtually indistinguishable from the unsuspecting women and girls from whom they have stolen the images, and it is vital to Defendants Webb and Schultz's monetization structure that the AI influencer's appearance remain consistent with the original images of the unsuspecting women and girls, including Plaintiffs, in order to maintain the ruse that the social media accounts and pornographic profiles are real women interacting with the consumers.

71. Once Defendants Webb and Schultz created AI influencers from the images stolen from social media accounts of unsuspecting women and girls, including Plaintiffs, Defendants Webb and Schultz generated provocative AI videos and images of their AI influencers to post on social media to drive followers to these AI influencers' social media accounts.

72. Defendants Webb and Schultz used generative AI models to create NSFW videos and images of their AI influencers, such as Plaintiffs, to setup NSFW profiles for the AI influencers on pornographic sites such as Fanvue. Defendants Webb and Schultz provided links

to the Fanvue pages for their AI influencers on the social media accounts for these AI influencers to lead followers to their NSFW pages. It was critical to their business model that the generated AI images and videos of their AI influencers depicting unsuspecting women and girls, including Plaintiffs, were consistent appearing, highly sexually suggestive, and provocative in order to push sexually stimulated followers to seek further sexual content on the linked NSFW accounts.

73.   Defendants Webb and Schultz provided a link to Fanvue pages for their AI influencers in their social media profiles which allowed sexually stimulated men to access NSFW, sexual, and pornographic images and videos of the AI influencers, including Plaintiffs, instantly upon a click of a link and payment of a subscription fee. These payments were made to the individuals who owned the pornographic accounts, such as Defendants Webb and Schultz.

74.   Defendants Webb and Schultz use AI automated chatbots to initiate and engage in chats disguised as the AI influencers. Defendants Webb, Schultz, and their chatbots use salacious and evocative chats purporting to be from the AI influencer to encourage the consumer to seek and desire more sexualized content from the AI influencer. Defendants Webb and Schultz would then use generative AI to create NSFW AI images and videos of the unsuspecting women and girls, including Plaintiffs, as requested by sexually excited consumers through the chats. Defendants Webb and Schultz then placed these NSFW AI images and videos of the AI influencers behind a paywall in the chat requiring a significant payment to "unlock" the NSFW AI images and videos for the consumers sexual satisfaction.

75.   The way this monetization structure is comprised, the Defendants provide the subject of the consumers' desire, the AI influencers. but then they cede control to the sexually stimulated consumer and his wallet to determine the menu of depraved things the unsuspecting woman or girl will be depicted doing for the satisfaction of the consumer and Defendants' desire for profit.

76.   Defendants Webb and Schultz used this system to monetize the images of unsuspecting women and girls, including Plaintiffs, through use of generative AI for at least the past 3 years.

77.   There is no way for an unsuspecting woman or girl to find out their image has been used to create an AI influencer and pornographic website unless they happen upon their own AI image on social media or elsewhere on the internet. No notification is provided, and Defendants and their subscribers do not seek consent from the unsuspecting women and girls before using their likenesses.

78.   Plaintiffs first happened upon their images and videos being used by Defendants in July 2025 after certain social media posts depicting the AI versions of them went viral on social media and were recognized by people who knew Plaintiffs who provided the images to them. The first notice Plaintiffs had of their images being used in this scheme was in July 2025.

79.   At no point did any Plaintiff consent to their images being used for any purpose by any Defendant to this lawsuit. Plaintiffs only learned of the use of their images after they had already been used by Defendants and their subscribers.

The ModelForge Defendants' "Blueprints"

80.   After years of profiting from the AI generated images and videos of unsuspecting women and girls, including Plaintiffs, in the scheme above, Defendants Webb and Schultz adjusted and recalibrated their business model from monetizing unsuspecting women and girls, to monetizing the monetization of unsuspecting women and girls by others.

81.   In 2025, Defendants Webb and Schultz began developing Defendants CreatorCore and AI ModelForge. Defendants AI ModelForge and CreatorCore were developed for the purpose of providing a system to provide instruction to other individuals on stealing and monetizing the images of unsuspecting women and girls along with the tools for said theft and monetization.

82.   Defendants Webb, Schultz, and John Doe 3 - Isaac developed CreatorCore. CreatorCore is a generative AI platform designed for the specific purpose of facilitating the

generation of AI influencers with NSFW capabilities. CreatorCore is used to create AI influencers and NSFW images and videos of AI influencers to be used on various social media platforms and other websites for monetization by CreatorCore customers.

83.   The ModelForge Defendants developed the AI ModelForge "Blueprints" which they sold as written courses and videos to teach customers how to use their CreatorCore system to monetize unsuspecting women and girls, including Plaintiffs, through the scheme Defendants Webb and Schultz had been using for over three years.

84.   The ModelForge Defendants' "Blueprints" include topics such as "AI ModelForge Blueprint," "Welcome Introduction," "Module 1: Creating Your Model," "Module 2: Creating Images," "Module 3: Video Gen," "Module 4: NSFW Generations," "Module 5: Social Media Setup," "Module 6: Fanvue Setup," and "TikTok Content Strategy." Each of these "Blueprint" pages can be found on the ModelForge Defendants' WHOP page. The ModelForge Defendants' "Blueprints" also include a day-by-day instruction manual as to how to monetize unsuspecting women and girls within 14 days including topics such as: "Day 1 Account Setup and Organization," "Day 2 Finding your Model," "Day 3 First Image Generation," "Day 4 Image Generation Mastery," "Day 5 Video Generation," "Day 6 NSFW Content Creation," "Day 7 Content Batch Day - Create Your Library," "Day 8 Instagram Account Setup," "Day 9 TikTok Launch Strategy," "Day 10 Going Viral," "Day 11 Fanvue Setup Guide," "Day 12 Automation and PPV," "Day 13 Launch Week Strategy," "Day 14 Scaling to $10k a Month." Each of these "Blueprint" pages can be found on the ModelForge Defendants Skool page. In order to access the ModelForge Defendants' "Blueprint" you must pay for access to the ModelForge Defendants' WHOP page or Skool page.

85.   Within WHOP, the header photo for several of these "Blueprint" modules depict an AI copy of Plaintiff H.R. scantily clad at a computer in front of a "Fanvue" sign.

86.   Within the ModelForge "Blueprints" the ModelForge Defendants lay out the goals of their program and how to use the "Blueprints" along with the CreatorCore platform to monetize unsuspecting women and girls, including Plaintiffs. The goal is to build a faceless

1 brand around your AI girl that looks real, speaks emotionally, and converts "simps" into

2 subscribers. The ModelForge Defendants note that it's absolutely possible to make "TONS of

3 money in this space" and that "Jack and I have been doing this for over 3+ years." Further, the

4 ModelForge Defendants note they have made over $4,000,000.00 from AI influencers. The

5 "Blueprints" will teach subscribers to create a realistic AI influencer, build her personality and

6 story, grow a following on Instagram and TikTok, and monetize it on Fanvue.

7   87.   The purpose of this setup is to allow the ModelForge Defendants to maximize

8 their profits from the creation of AI influencers from unsuspecting women and girls, including

9 Plaintiffs. This is accomplished by owning and maximizing every step of the process of

10 generating AI influencers. The ModelForge Defendants have their own income streams from

11 their AI influencers but have also grown their income by selling the ModelForge Defendants'

12 "Blueprints" and CreatorCore to other predatory men. The ModelForge Defendants now profit

13 from every step of the process. The greater the number of predatory men who use their

14 "Blueprints" and CreatorCore to generate AI influencers, the more money is made by the

15 ModelForge Defendants. Further, the ModelForge Defendants provide a referral code to their

16 subscribers to make further profit when their subscribers join Fanvue to monetize their NSFW

17 AI influencer.

18   88.   The ModelForge Defendants' instruct on Setting Up Your AI Model. The

19 ModelForge Defendants advise subscribers to go to either google or Instagram and find a girl

20 you would like to change. The ModelForge Defendants instruct subscribers to steal 5-10

21 different photos of that woman to use as reference photos for generating an AI influencer.

22

23

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89.

🎯 Finding Your AI Girl: The Complete Guide

First, we need to create your own personal AI girl. The best way to do this is by finding a girl you'd like to use as **visual inspiration**. Think of this as finding a "muse" for your AI model.

Why Reference Photos Matter

Reference photos serve as a visual guide for the AI. They help ensure:

- **Consistency:** Your AI girl looks the same across all generated images
- **Realism:** The AI understands realistic facial features, proportions, and lighting
- **Quality:** High-quality references = high-quality outputs
- **Brand identity:** A cohesive look that followers will recognize

Requirements: Find 5-10 Different Pictures

Requirements: Find 5-10 Different Pictures

Photo Variety Checklist:

- **Different settings:** Indoor, outdoor, casual, dressed up
- **Different angles:** Face close-up, full body, side profile, 3/4 view
- **Different expressions:** Smiling, serious, playful
- **High quality:** Not blurry, pixelated, or overly filtered
- **Good lighting:** Clear, well-lit photos (avoid dark or poorly lit images)

Why 5-10 photos? This gives CreatorCoreAI multiple reference points to create a consistent look across all your generations. More variety = better consistency and more AI learning data!

⚠ **CRITICAL LEGAL WARNING:** If you use someone "popular" or well-known (celebrities, major influencers), you MUST change the AI output significantly to avoid copyright/likeness issues. It's MUCH safer to use lesser-known models or Instagram micro-influencers (5K-50K followers).

90.

🔍 **Where to Find Reference Photos**

Here are the best sources for high-quality reference photos

1 **Instagram (Best Option)**

Why Instagram: Tons of high-quality photos, diverse looks, easy to find micro-influencers

1. **Go to:** instagram.com/explore
2. **Search hashtags:**
   - #model
   - #influencer
   - #fitnessgirl
   - #fashionmodel
   - #beautyblogger

3. **Filter by follower count:** Look for accounts with 5K-50K followers (not huge celebrities)
4. **Save photos:** Screenshot or download 5-10 different photos from their profile

💡 **PRO TIP:** Micro-influencers (5K-50K followers) are perfect because they have professional-quality photos but aren't famous enough to cause legal issues. Plus, they often have diverse content!

91.   The ModelForge Defendants provide an exact example of what an AI influencer will look like:

Let me give you an exact example of what your Ai girl will look like.

NORMAL PHOTO

AI PHOTO

The top photo in this "exact example" is a photo taken directly from Plaintiff H.R.'s personal Instagram page. The bottom photo is a generative AI influencer depicting Plaintiff H.R. There is no mention of obtaining consent from the woman or girl from whom you are stealing the images. The ModelForge Defendants advise subscribers to find 5-10 pictures of the same unsuspecting woman or girl in different settings to generate an AI influencer. Again, subscribers are advised to find the unsuspecting woman or girl from Google or Instagram. Subscribers are advised not to use "popular" women or girls or they "will have to change the AI by a good amount so no risk is involved" and because "they have professional-quality photos but aren't famous enough to cause legal issues."

💡 **PRO TIP:** Micro-influencers (5K-50K followers) are perfect because they have professional-quality photos but aren't famous enough to cause legal issues. Plus, they often have diverse content!

> ⚠ **CRITICAL LEGAL WARNING:** If you use someone "popular" or well-known (celebrities, major influencers), you MUST change the AI output significantly to avoid copyright/likeness issues. It's MUCH safer to use lesser-known models or Instagram micro-influencers (5K-50K followers).

92.   The ModelForge Defendants provide a video with their "Blueprints" titled "GTP Warm Up" wherein they teach subscribers to use ChatGPT to help create an AI model. This video begins with the ModelForge Defendants uploading Plaintiff H.R.'s Instagram photo into ChatGPT and requesting help creating an AI influencer with this photo they are providing.

What's on your mind today?

Hey chatGPT, I need you to help me create an Ai model with this photo I am provding you.

╋   ⚙ Tools   🎤   ⬆
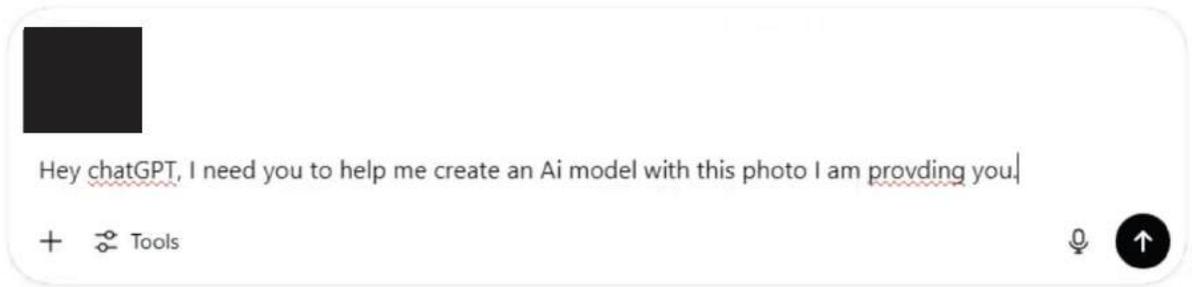
The ModelForge Defendants tell ChatGPT the model's name is Stella, she is 23 years old and advise she is to be "Seductive and elegant." The AI influencer is going to be used for the ModelForge Defendants' Instagram and TikTok and "funneling people to my Fanvue account."

1) Her name is Stella
2) She is 23 Years old
4) Seductive and elegant

Step2: I will be using her for my Instagram/Tiktok and funneling people into my Fanvue account.

Step3

╋   ⚙ Tools   🎤   ⬆
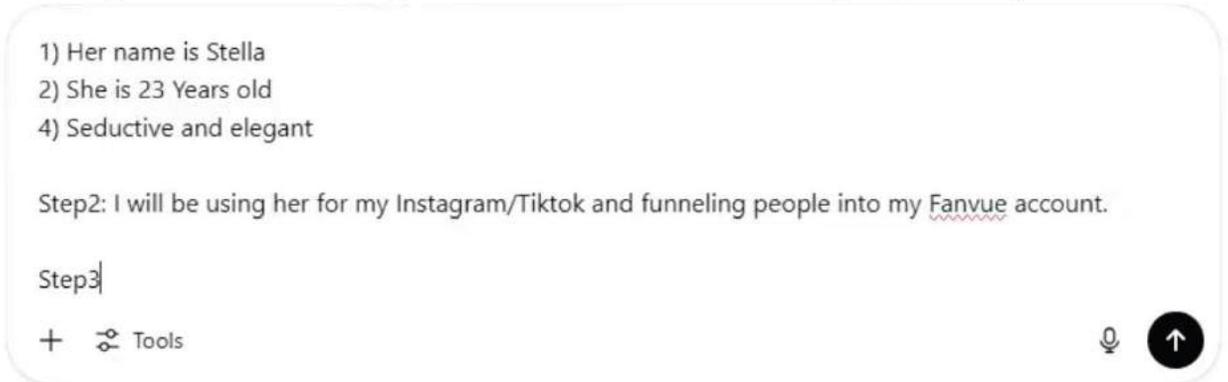
ChatGPT can make mistakes. Check important info.

The ModelForge Defendants are then provided prompts to create the AI model on Defendant FAL's generative AI.

🖨 PROMPT FOR IMAGE GENERATION (Static Photos – FAL.AI)

Use this as your base prompt for Stella in Fal.ai image gen:

vbnet   ⏷ Copy   ✏ Edit

A hyper-realistic photo of a seductive and elegant blonde woman sitting at a dimly lit upscale res

You can tweak:

- Location (e.g. "inside a rooftop bar," "walking through a hotel lobby")
- Mood (e.g. "smirking flirtatiously," "eyes locked on camera")

🎬 PROMPT FOR VIDEO GENERATION (FAL-KLING)

Use this for a 5–10s seductive looping video of Stella:

css   ⏷ Copy   ✏ Edit

A seductive, elegant blonde woman sitting at a candle-lit dinner table in an upscale outdoor resta

Once the AI influencer is generated within CreatorCore the CreatorCore platform can then be used to generate images, videos, and NSFW content of the AI influencer without adding any further images. CreatorCore has learned what the AI influencer looks like and will be able to generate consistent images, videos, and NSFW content of the AI influencer.

93. The ModelForge Defendants' "Blueprints" contain Image Generation training using CreatorCore. This training includes a video detailing how to generate AI images of the unsuspecting women and girls whose images a subscriber has stolen. Within the video the ModelForge Defendants use the AI generated influencer, Stella, who is Plaintiff H.R., and a prompt photo from Plaintiff's H.R.'s personal Instagram profile.
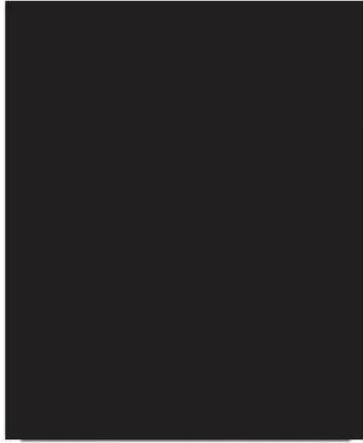
This is the first image we will be using. I will be using Creatorcore ai to help me generate this image.

Can you please provide me a promote for this girl. Make her elegant, seductive

This prompt photo is directly from Plaintiff H.R.'s personal Instagram profile. The ModelForge Defendants indicate they will be using CreatorCore to generate the AI image, and that they need the generated image to be elegant and seductive.

94. The entirety of this video "Module" is two minutes and forty-three seconds long. During this video the ModelForge Defendants generate two separate images of Plaintiff H.R. beginning with a base "prompt" image from Plaintiff H.R.'s personal Instagram account.

A glamorous, seductive blonde woman in her mid-20s with sun-kissed glowing skin and voluminous, wavy...

Jun 27, 2025

You have now made your first image!

95. During the ModelForge Defendants' Image Generation "Module" there are other generative AI images of Plaintiff H.R. depicted within the CreatorCore platform.
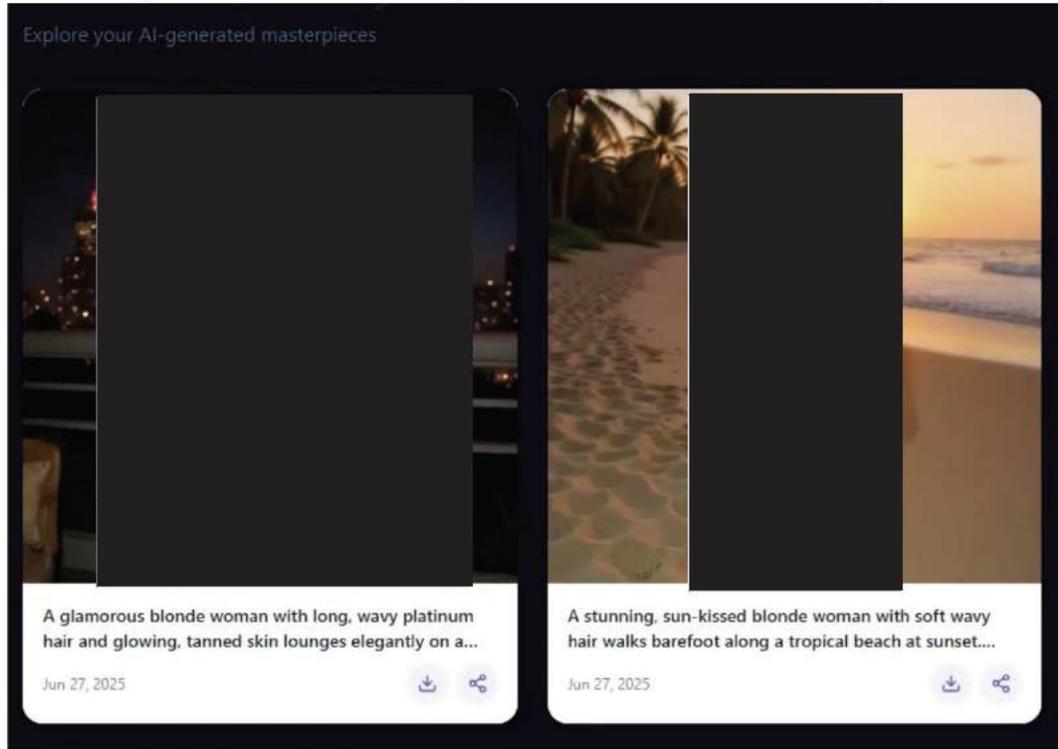
96. Within the ModelForge Defendants' Image Generation "Module" they include another separate image of Plaintiff H.R. generated using CreatorCore.

MODULE 3 : CREATORCOREAI SOFTWARE.
CREATING YOUR FIRST IMAGE.

Link: https://creatorcoreai.com/

CODE: "CC15" FOR 15 OFF DISCOUNT

CLICK THE LINK BELOW

📹 Model-Image-Creation-AiModelforge.mp4
(PLEASE WATCH VIDEO TO MAKE YOUR FIRST IMAGE.)
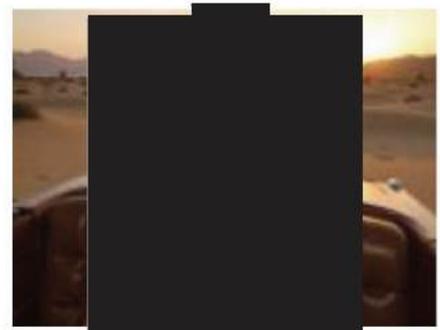
97. The ModelForge Defendants' how to create an image in CreatorCore video is a screen recording of Defendant Schultz's laptop screen. Throughout the video, several AI

generated images of Plaintiff H.R. and other unsuspecting women are depicted on Defendant

Schultz's laptop screen.
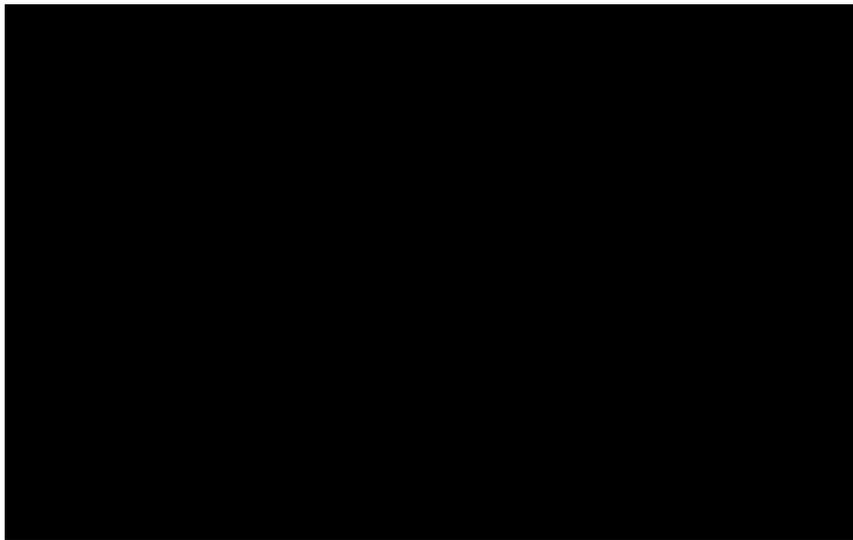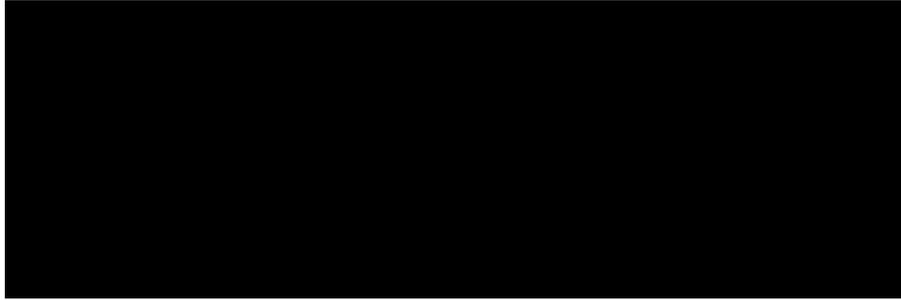
The volume of images shows how frequently the ModelForge Defendants were using unsuspecting women and girls, including Plaintiffs, to generate images of unsuspecting women and girls they desired to see in varying stages of undress. Further, it gives indication to the number of women involved and the simplicity with which Defendants' program permits the likenesses and identities of women and girls to be stolen for monetization by Defendants.

98.   The ModelForge Defendants' "Blueprints" contain training on video creation. Again, the video creation training uses an image of Plaintiff H.R.

MODULE 4: CREATING YOUR FIRST AI VIDEO.

Link: CreatorCoreVideoGeneration

This is a full indepth guide on how you will be using ChatGPT & CreatorCore Ai to generate realistic Ai videos for you Instagram reels and TikTok videos.

PLEASE WATCH BELOW CLICK LINK

Model-Video-Creation-AIModelForge.mp4
(FULL VIDEO GUIDE ON HOW TO CREATE YOUR AI VIDEOS.)
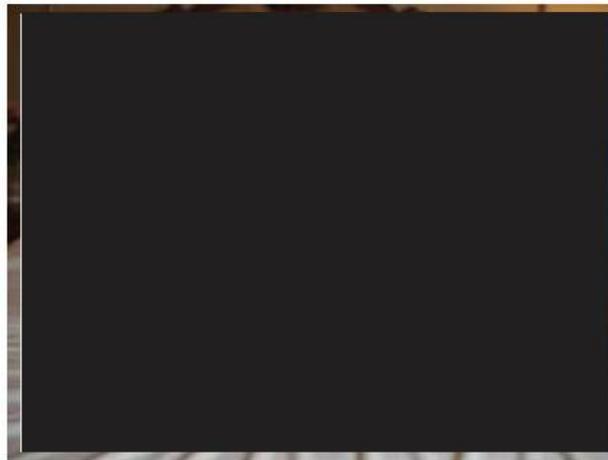
99.   The ModelForge Defendants' video creation training video is three minutes and fifteen seconds long and depicts the ModelForge Defendants making three separate videos of

Plaintiff H.R. in lingerie acting seductively on a bed. The ModelForge Defendants' prompts for these videos indicate a desire for sexual material. The woman depicted is indistinguishable from Plaintiff H.R.
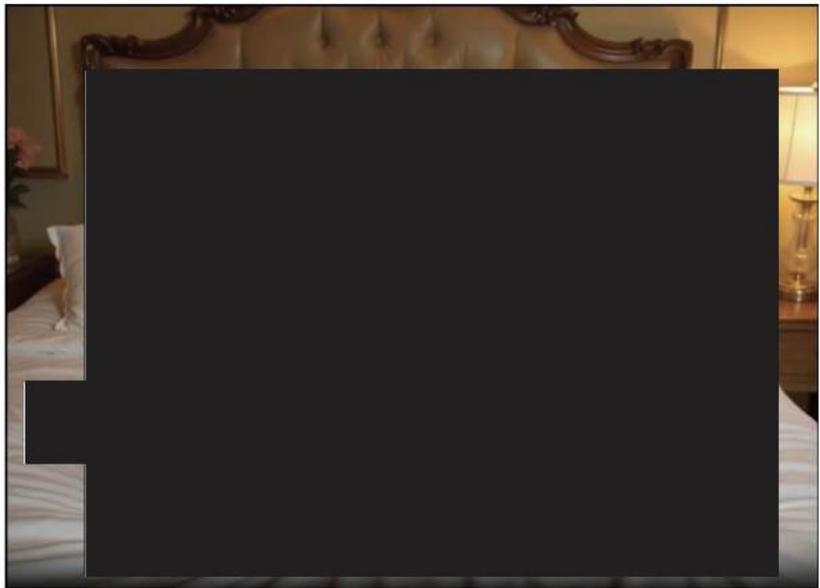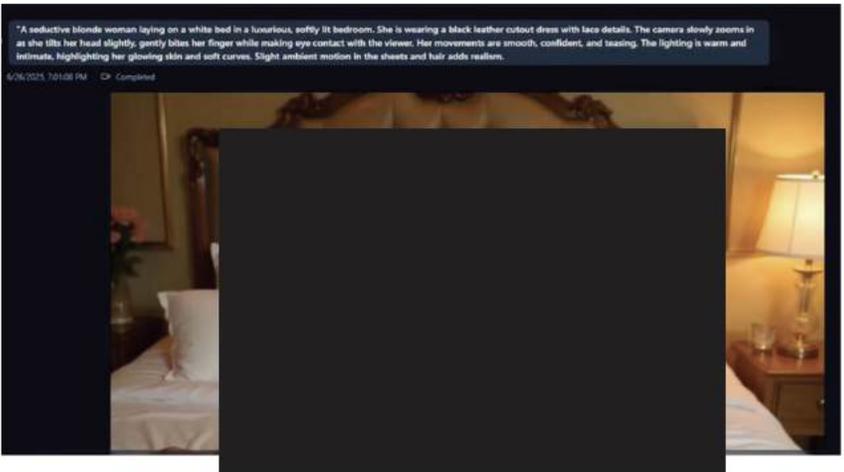
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     100. Again, during the course of this video, you can see on Defendant Schultz's desktop several other images and videos of Plaintiff H.R. and other women saved on the computer which have been generated by the ModelForge Defendants.
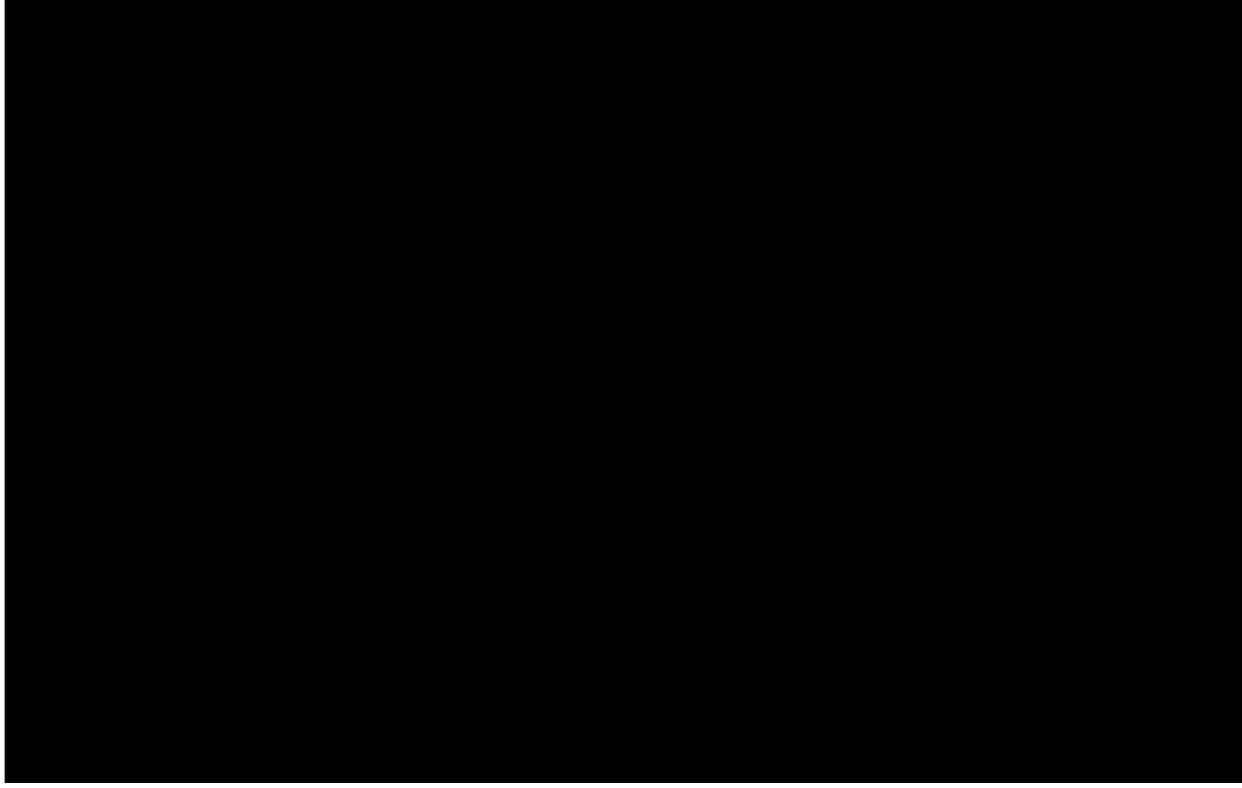
101. During the course of the video creation "Module" you can see the video creation is being performed and hosted on the backend by Defendant FAL as the video is found on a URL starting with v3.fal.media/files.
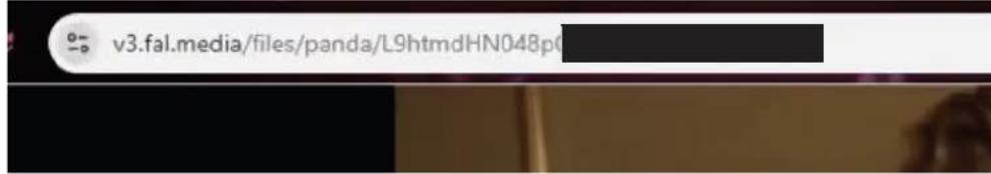
102. The ModelForge Defendants' CreatorCore image generation is designed for and capable of generating nude and NSFW images of women and girls from AI influencers who have solely been created with clothed images of unsuspecting women and girls, including Plaintiffs. CreatorCore image generation is designed for and capable of removing clothing from images of unsuspecting women and girls, including Plaintiffs, to generate nude NSFW images of unsuspecting women and girls who have never posted themselves in any stage of undress.

103. The ModelForge Defendants' "Blueprints" train on NSFW generation. This teaches subscribers how to use CreatorCore to generate NSFW, nude and pornographic, videos of their AI influencer whose images have been stolen from unsuspecting women and girls, including Plaintiffs. CreatorCore provides subscribers the ability to generate ultra-realistic

NSFW content which can look almost indistinguishable from real footage of unsuspecting women and girls, including Plaintiffs.

MODULE 5: NSFW Video Generation Module (CreatorCoreAI)

This module teaches you how to generate ultra-realistic NSFW video content using CreatorCoreAI.
If done properly, these videos can look almost indistinguishable from real footage—ideal for marketing, lead generation, and monetization.

⚙ Image Generation Settings Explained (Complete Guide)

This is the MOST important section. Read carefully and refer back to this whenever you generate images!

● **Trained LoRA (AI Model)**

What is this? A "LoRA" is a custom-trained AI model. Think of it like teaching the AI to recognize a specific person's face.

For now: Select **"None"** or any available default model from the dropdown. You don't have a custom model yet — that's normal!

Later (Advanced): You can train your own custom LoRA to make your AI girl's face perfectly consistent across ALL images. We'll cover this in advanced lessons.

● **Reference Image (Optional but HIGHLY Recommended)**

What it does: Guides the AI to match a specific look, face structure, pose, or style. This is one of the most powerful features!

How to Upload:

1. **Click** the upload area (gray box with "Upload" text)
2. **Select** one of your 3-4 reference photos from Day 2
3. **Wait** for the upload to complete (you'll see a thumbnail)

Requirements:

- **Max file size:** 5MB
- **Minimum resolution:** 300×300 pixels
- **Formats:** JPG or PNG

💡 **PRO TIP:** For your first image, upload your BEST reference photo — the one you want your AI girl to look most like. The better the reference, the better the result!

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👀 Reviewing Your Results

Once generated, you'll see 4 images. Here's how to evaluate them:

Quality Checklist:

☐   Face looks realistic (not distorted, warped, or uncanny)

☐   Facial features are consistent with your reference photo

104.   These NSFW images and videos are AI generations, but they are fully intended to be wholly realistic images and videos of the unsuspecting women and girls, including Plaintiffs. The NSFW videos and images of unsuspecting women and girls are meant to be and are indistinguishable from real images and footage of these unsuspecting women and girls.

105.   The ModelForge Defendants' "Blueprints" and CreatorCore's purpose is to generate images and videos of these unsuspecting women and girls, including Plaintiffs, that the women and girls have not consented to, have not chosen to create, and have not participated in. These images and videos of unsuspecting women are generated for the sexual satisfaction of people on the internet. The whole purpose of the ModelForge Defendants' "Blueprints" and the CreatorCore platform is to facilitate generation of images and videos of unsuspecting women and girls which are indistinguishable from the real unsuspecting women and girls because the real unsuspecting women and girls have been deemed desirable by those generating the indistinguishable AI images and videos. The point is to have the AI influencers directly and unambiguously depict the selected unsuspecting women and girls for the purpose of the sexual gratification of the ModelForge Defendants' subscribers and those they attract to their pornographic accounts with publicly posted indistinguishable depictions of these women and girls.

106.   The ModelForge Defendants' NSFW generation training instructs subscribers that they must generate a nude base image of their AI influencer in order to successfully generate a NSFW video of their AI influencer through CreatorCore. If the subscriber does not

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yet have a nude base image of their AI influencer, they are instructed to return to image generation to generate a nude base image of their AI influencer which can be done through CreatorCore.

Step 1: Prepare a Nude Base Image

You must upload a nude image of your AI model to begin.
This base image is critical—guiding the system on body structure, lighting, and pose.

(NSFW EXAMPLE)

Don't have one yet? Go back to the NSFW Photo Generation Module to create your first high-quality base image.
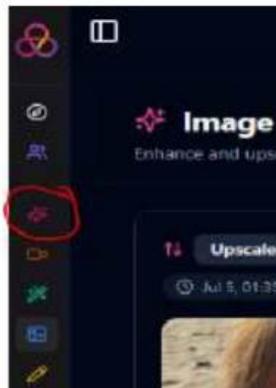
107. Generating a nude image of a clothed woman through CreatorCore is incredibly simple and can be done in a matter of seconds even by someone with absolutely no sophistication in programming or AI even when using solely clothed images of an unsuspecting

woman or girl. Once an AI influencer has been generated using only clothed photos, one goes to the "Generate Image" tab, selects their desired AI influencer, and enters a brief prompt indicating they want the model nude with the settings set to NSFW. Within 15 seconds after clicking the "Generate" button CreatorCore will generate a nude image of the AI influencer generated strictly with clothed images of the unsuspecting woman or girl. Training on how to generate a nude image of an unsuspecting woman or girl solely from clothed images of said woman or girl is provided within the ModelForge Defendants' "Blueprints."

Creating Your First NSFW Image

Step 1: Image Generation Settings

Navigate to **Generate Image** in CreatorCoreAI.

Settings:

1. **Trained LoRA:** Select your model
2. **Reference Image:** Upload a SFW image of your AI girl (we'll modify it to NSFW)
3. **Prompt:** Use NSFW-specific prompt (see below)
4. **Image Size:** Portrait 9:16 (for Fanvue)
5. **Number:** 2 (test variations)
6. **Content Type:** NSFW ⚠
7. **Safety Level:** No Filter ⚠
8. **Format:** PNG (quality matters for paid content)

Example 2: Artistic Nude (Medium NSFW)

```
Hyper-realistic photo of a beautiful [hair color] woman lying on white bedsheets, artistic
        nude photography, tasteful pose covering intimate areas, soft morning light
from window creating natural
        highlights and shadows, professional fine art photography style, ultra-
realistic skin texture with subtle pores
        and natural imperfections, 4K DSLR quality, photorealistic.
```

108.   The ModelForge Defendants instruct subscribers to upload their nude base image of their AI influencer into the video generation system and select a NSFW video generation AI platform, hosted by Defendant FAL, John Doe 4 – ByteDance, and John Doe 5 – WAN, from the dropdown menu. These AI models have been selected by the ModelForge Defendants as

they are specifically trained to handle erotic and full-nude rendering with enhanced anatomical accuracy and realism.

> These models are specifically trained to handle erotic and full-nude rendering with enhanced anatomical accuracy and realism.

109. The ModelForge Defendants spend a significant portion of this NSFW generation training explaining how to generate realistic nipples and breasts, including providing enhancement tools within CreatorCore and providing exemplar prompts to create realistic nude images of unsuspecting women and girls, including Plaintiffs.

> **Upscale Prompt Tip (for Realistic Nipples & Breasts):**
> Use this prompt in the Upscale tab:
>
> "Enhance the image with ultra-realistic anatomical detail, focusing on the chest area. Improve skin texture with subtle pores, warm natural gradients, and soft tonal transitions. Increase clarity and realism of the nipples with lifelike color variation, fine detail, and natural shading—avoiding plastic or overly smooth appearance. Maintain the sunlit beach lighting, soft shadows, and golden hour warmth across the entire body. Preserve natural proportions and depth. High-resolution DSLR-style finish, photorealistic, tasteful, and detailed."
>
> Or
>
> hyper-realistic nude woman, soft skin texture, natural breast shape, realistic nipples, balanced lighting, DSLR quality, 8k detail, smooth curves, symmetrical anatomy, subtle shadows, no distortion, photorealistic skin tones

110. Using these steps provided by the ModelForge Defendants and using the CreatorCore platform, **any subscriber can take any unsuspecting woman or girl from social media and turn them into the subscriber's own personal nude/pornographic model in minutes**. Subscribers can create their own personal nude models from unsuspecting women for their own personal satisfaction, with whom they can do whatever they want through the ModelForge Defendants' CreatorCore platform without the consent of any the unsuspecting women or girls. This is CreatorCore's purpose, to facilitate the creation of nude and pornographic images and videos of unsuspecting women and girls. Subscribers may use these unsuspecting women and girls to generate images and videos depicting sex acts, satisfying various kinks or fetishes, or putting them in compromised positions.

111.   The ModelForge Defendants know the purpose of creating NSFW content of unsuspecting women and girls is improper and wrong, explicitly saying so within their "Blueprints." Despite this knowledge, the entirety of their "Blueprints" are geared towards two goals: making indecipherable AI copies of unsuspecting women and girls, and ensuring they don't pick someone "popular" or "famous" enough to get caught.

Ethics & Responsibility FIRST

Before we create NSFW content, understand this:

Legal & Ethical Guidelines

☑ **ALLOWED:**

- Creating AI-generated adult content for legal adult platforms (Fanvue)
- Selling NSFW content to verified adults (18+)
- Using AI models that don't resemble real people closely

✖ **NOT ALLOWED / ILLEGAL:**

- Creating content resembling real people without consent
- Creating content of minors (instant legal trouble)
- Posting NSFW to platforms that ban it (Instagram, TikTok)
- Misrepresenting AI content as real person

💡 **PRO TIP:** Micro-influencers (5K-50K followers) are perfect because they have professional-quality photos but aren't famous enough to cause legal issues. Plus, they often have diverse content!

⚠ **CRITICAL LEGAL WARNING:** If you use someone "popular" or well-known (celebrities, major influencers), you MUST change the AI output significantly to avoid copyright/likeness issues. It's MUCH safer to use lesser-known models or Instagram micro-influencers (5K-50K followers).

112.   Beyond the personal use facilitated by the ModelForge Defendants' "Blueprints" and the CreatorCore platform, the ModelForge Defendants specifically instruct subscribers how

1   to use their NSFW AI influencers for monetization through social media and subscriber

2   websites for pornographic content, such as Fanvue.

3   113.   The ModelForge Defendants' "Blueprints" train subscribers to set up social

4   media accounts and generate traffic for the same with the AI influencer.

5   114.   The stated purpose of the social media setup is to generate views and gain

6   followers to drive sexually stimulated men to subscription pornographic website profiles of the

7   AI influencers depicted in the social media profiles.

8   115.   Within the ModelForge Defendants' social media training subscribers are

9   instructed to create a seductive bio for their AI influencer. Subscribers are then instructed to

10 follow real women who have Onlyfans pages with their own sexual content, and other real

11 models in that space to make their AI influencer appear real. Subscribers are then instructed by

12 the ModelForge Defendants to create content which hooks its viewers quickly visually and with

13 a caption by making them feel sexually aroused. The purpose of this social media training is to

14 teach subscribers how to generate views through hyper-sexualized content and to push their AI

15 influencer towards social media users who are inclined to be attracted to their sexual content.

2. Pick a Strong Profile Name

- This is the "name" not the @username.
- Use something like "Stella | 23" or "Sophia – LA Girl "
- If you didn't choose a name, ask ChatGPT:

    "Can you give me 3 seductive but elegant names for an AI girl who is 23 and lives in Miami?"

4. Write a Simple, Seductive Bio

- Keep it short, mysterious, and emotionally triggering.

Pro tip: Use emoji spacing to keep it aesthetic. Link your Fanvue with a link shortener like Beacons, AllMyLinks, or Solo.to

MODULE 5: GOING VIRAL & STANDING OUT

How to Get Views, Blow Up, and Be Unforgettable

If you're not getting views, you're invisible. The only way to grow fast in this space is to grab attention and trigger engagement. This module teaches you how to go viral by being either seductive, shocking, or both — and doing it in a way that actually converts.

Bottom Line:

If your content isn't getting attention — it's not going to convert. This module is about:

- Using sex appeal without getting flagged
- Saying bold things without sounding desperate
- Building mystery and desire that turns followers into buyers

16   116.   Within the ModelForge Defendants' social media training there is a linked video

26 presenting to subscribers how to drive engagement with their social media accounts. In this

video, there is an image of a social media account, which, upon information and belief, is owned by the ModelForge Defendants. On the social media training video, unlike on Instagram presently, the header of the exemplar Instagram account "@sydneyy_sky" depicts Plaintiff M.G. This social media account "@sydneyy_sky," presently has a header image on the account which is one of the other unsuspecting women depicted in the ModelForge Defendants' advertisements for their platform.

117. The ModelForge Defendants also have training devoted to TikTok for AI influencers. This training repeatedly uses AI generated images of Plaintiff H.R. to provide examples of content for TikTok.

STEP 3: What to Post (Starting Day 3)

This is the most important part of the module. Your AI model needs to look and act like a real seductive micro-influencer. Here's how:

Format to Use:

- Vertical 9:16
- 3–10 seconds long
- Eye contact, slight movement, lip syncs, or slow turns
- Use trending sounds (don't skip this!)
- Add text overlay with *mystery* or *seduction*

- If you've already created your AI girl, use one of your **AI-generated images** as the profile photo — choose one that looks like a natural selfie, not a staged photoshoot.
- If you haven't created your AI girl yet, don't worry — just set up the account for now. We'll cover how to generate your AI girl and choose the perfect profile picture in a later module.
- Important: Try to use a **clean IP/device**

118. The ModelForge TikTok "Module" is again aimed at sexualized content for the purpose of driving followers to subscription pages depicting images and videos of the AI influencers.

🐷 **The Money Flow:**

TikTok Viral Video → Profile Click → Link in Bio → Fanvue Free Trial → $$ Subscriber

This is the funnel that makes creators $10K+ per month.

119.   The ModelForge Defendants' "Blueprints" provide training on Fanvue setup. Fanvue is a subscriber-based pornography website akin to Onlyfans where creators have a subscription profile which allows profile subscribers to view NSFW and pornographic content. The major difference between Fanvue and Onlyfans is Fanvue allows influencers and models which are strictly AI generated.

We need to now set up Fanvue. Instead of using OnlyFans we use Fanvue for the fact that they let us use AI models.

💡 Why Fanvue is Perfect:

- Explicitly **AI-friendly** (no ban risk!)
- **Growing platform** with less competition than OF
- **Weekly payouts** (get your money fast)
- **Built-in automation tools** for messages
- **NSFW allowed** without restrictions

[Page break in original]

120.   The ModelForge Defendants advise their subscribers to use Fanvue to setup their NSFW accounts for their AI influencers because it allows AI influencers setup by real people not depicted in the AI influencers' profiles.

121.   The ModelForge Defendants provide a link within this training to signup for Fanvue using their referral link which pays the ModelForge Defendants for every new "creator" on Fanvue. The referral link indicates the ModelForge subscriber signing up for Fanvue has been referred by "Stella." "Stella" is Plaintiff H.R. and this is a reference to her Fanvue "creator" account which was created and operated by the ModelForge Defendants.

www.fanvue.com/signup

(LINK THIS LINK ABOVE)
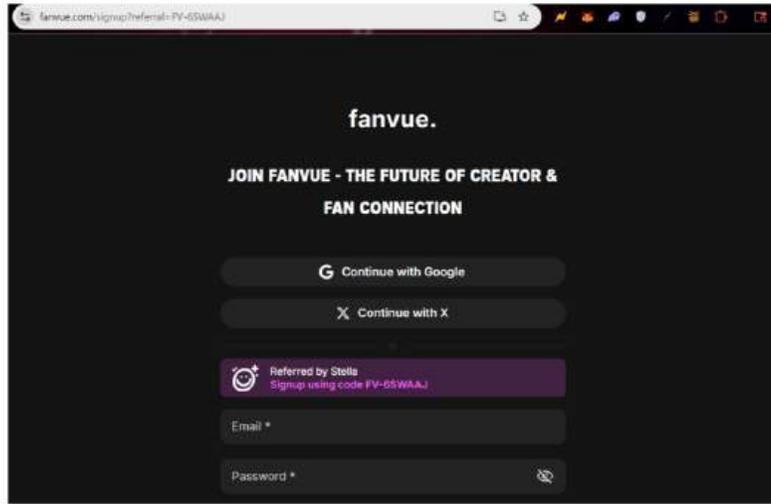
122. The ModelForge Defendants instruct their subscribers to ensure they sign-up for a NSFW creator account and that the government issued identification provided at sign-up does not need to match the image of the AI influencer who will be depicted on the account.

123. The ModelForge Defendants' "Blueprints" teach subscribers to monetize their AI influencer on Fanvue in a couple of different ways. One is to lure subscribers with photos and videos on their feed. A second way is to create pay-per-view (PPV) content for subscribers.

The Two-Tier System

Here's how top creators structure content to maximize revenue:

Content Type	What to Post	Price	Goal
FREE FEED	Soft NSFW • Lingerie • Teasers • Bikini shots • Implied nudity	Included in $3.99 sub	Keep them subscribed month-to-month
PPV (DMs)	Hard NSFW • Nude content • Explicit poses • "Private" sets • Custom requests	$10-50 per PPV	Upsell revenue 💰

💰 **The Revenue Split:**

- **40% of revenue:** Base subscriptions ($3.99/month)
- **60% of revenue:** PPV upsells ($10-50 each)

Translation: The free feed keeps them paying monthly. The PPV messages are where you make REAL money!

124.   The ModelForge Defendants instruct subscribers how to setup their AI influencer's Fanvue account to best convert views into subscriptions, and money. One way in which the ModelForge Defendants instruct subscribers to monetize Fanvue is by engaging in chats posing as their AI influencer with sexually stimulated customers. The ModelForge Defendants suggest certain automated chats to attempt to engage sexually stimulated men and lure them into suggesting content they would like to see. Once particular NSFW content is suggested by the customer, a CreatorCore subscriber can use CreatorCore to generate the NSFW content specifically requested by the customer to send to the customer behind a paywall, or PPV, requiring payment to view the photo or video.

PART 3: Fanvue automation messages:

Step 1: Setting > Creator Settings > Automated Messages:

USE THESE:

🆕 **New Subscriber**
"Hey babe 😘 thanks for subscribing! You just unlocked *exclusive* content I don't post anywhere else 😈 Let me know what you're into and I'll send something special 💌"

👀 **New Follower**
"Hey cutie 👋 noticed you followed me 👀 I post the *real* stuff inside here – don't be shy 😏 you're one click away from my private world 💋"

❌ **Subscriber Canceled**
"Sad to see you go 💔 If it was something I did, I'm always open to feedback! If you ever miss me, you know where to find me 😘"

125.   The below images depict Fanvue automated messages, two of which are from different Fanvue accounts depicting an indistinguishable AI copy of Plaintiff H.B.
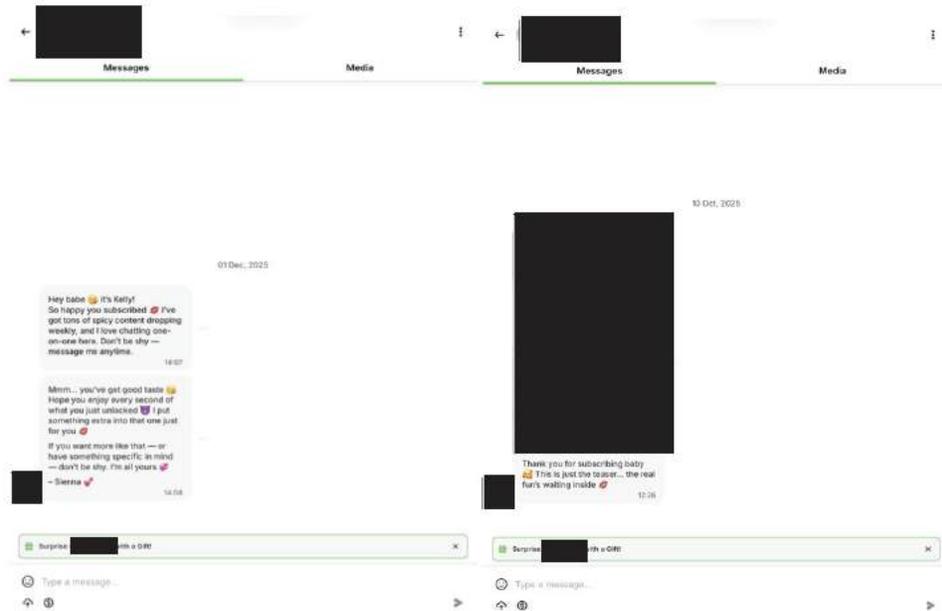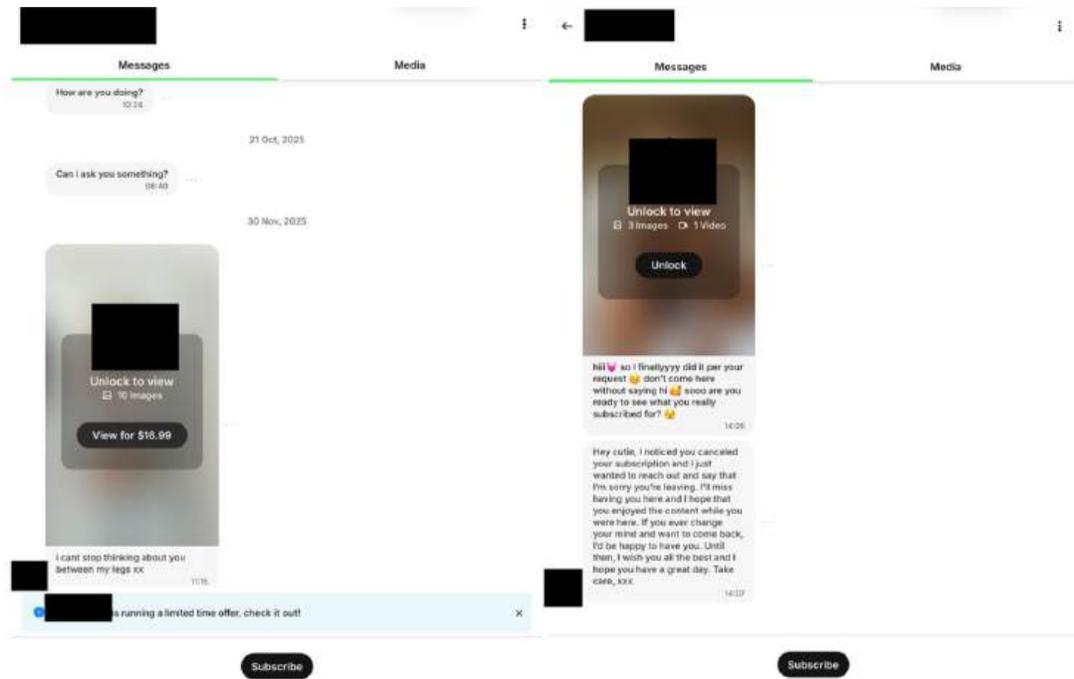
126.   The ModelForge Defendants teach and encourage their subscribers to send messages like the above to their followers on Fanvue to engage them and monetize their sexual arousal. Fanvue is not a domestic platform, and has subscribers worldwide who participate in the platform completely anonymously. These Fanvue chats are about engaging the anonymous men and boys on the other end, making them believe they have a connection or relationship with the AI influencer depicted on the Fanvue page. This adds a significant danger the lives of the unsuspecting women and girls depicted on the AI influencer Fanvue pages as it creates hordes of men who believe they have a real relationship with the woman or girl depicted by the AI influencer.

127.   The ModelForge Defendants "Blueprints" explain to subscribers how to price the NSFW content of their AI influencers to best monetize their likenesses. In so doing, the ModelForge Defendants suggest generation of varying degrees of explicit NSFW content of AI influencers for different levels of payments by customers.

PPV Pricing Guide

Content Type	Recommended Price	Example
Single nude image	$10-15	"Exclusive photo set 🔥"
Image set (5-10 images)	$20-30	"Private collection 🌶️"
Short video (5-10s)	$25-40	"Something I made for you 😈"
Premium set + video	$40-50	"My best content yet 🔥"

128. The ModelForge Defendants "Blueprints" also teach their subscribers to send out unsolicited messages to all customers containing PPV NSFW images and videos of their AI influencers for profit. The ModelForge Defendants suggest sending 2-3 PPV NSFW images or videos to every one of their Fanvue customers a week. This means generating and publishing 100-150 NSFW images and videos a year of the unsuspecting woman or girl selected as the AI influencer to be sent to random men, completely unsolicited, for profit.

7 Mass Message (Weekly PPV Blast)

Trigger: Manual (you send this once a week to all subscribers)

Template:

"Hey babe 🌶️"

"I made something special just for you... want to see? 😈"

"[Attach your PPV content here - price $15-25]"

"Don't keep me waiting 😊"

Why it works: Direct PPV upsell. "Just for you" makes it feel personal. Price: $15-25 is the sweet spot for weekly PPV.

💡 **PRO TIP:** Send mass PPV messages on **Thursday or Friday evenings** (7-9 PM). That's when guys have disposable income (payday!) and are relaxed at home.

PPV Messages	$5-$15 each	Send 2-3/week to ALL subs

💡 **Pro Tip:** PPV is where you 10x your income. A $10 PPV message sent to 100 subs with 20% purchase rate = $200 in one send. Do this 3x/week = $2,400/month EXTRA on top of subscriptions.

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129.   The ModelForge Defendants' "Blueprints" exist solely to teach subscribers how to monetize unsuspecting women and girls without their consent. Their entire purpose is to steal images of women and girls from social media and turn them into sexual objects for profit without their knowledge or consent. The ModelForge Defendants profit from every subscriber to their "Blueprints" and have an army of social media accounts to direct predatory men and boys to their "Blueprints." If a subscriber follows through on the instructions within the "Blueprints," the ModelForge Defendants profit from every step of that process while unsuspecting women and girls, like Plaintiffs, are harmed.

The ModelForge Chats

130.   Accompanying the "Blueprints," subscribers are joined onto a series of chats on different platforms, including WHOP, Discord, and Telegram. Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and several of John Does 6-50 are involved in these chats. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah appear to speak on behalf of Defendants AI ModelForge and CreatorCore within the chats.

131.   The ModelForge Defendants operate the AI ModelForge channel on WHOP. This includes a "Blueprint" as well as the "Main Paid Chat." This chat is used by subscribers who have paid a subscription fee to get help on using CreatorCore, gaining traction on social media, sharing the AI influencers they have created with the images stolen from unsuspecting women and girls, and managing and monetizing Fanvue. It is presently unknown how many subscribers the AI ModelForge Main Chat has had over time.

132.   The ModelForge Defendants operate the CreatorCore Discord channel on Discord. This includes further instructions regarding the monetization of stolen images of unsuspecting women and girls. The Discord channel contains chats under the following topics: [Start Here] Rules, Welcome, FAQ, Updates, Giveaways, Troubleshooting, [CreatorCore Network] Start Here, Create Your Model, Whop Community, [Community Hub] General, Tips and Tricks, Prompt Sharing, Creator Showcase, Collab Zone, [CreatorCore Guide] CreatorCore Overview, How to Prompt, Using Your Lora, Image Creation, Video Creation, Face Swap, Free

Downloadables, [Free Tools] Prompt Optimizer, [Monetization and Growth] Learn to Monetize, TikTok Growth, Instagram Growth, Discord Growth, Fanvue Strategy, Affiliates, [Premium Access] Premium Chat, Premium Tools, Premium Training, Premium Downloadables. These subcategories come with additional instructions regarding the topics, items for download, AI generations of women and girls, and chats with the ModelForge Defendants. The CreatorCore Discord channel has 656 subscribers.

133. The ModelForge Defendants operate the CreatorCore Ai Models Telegram channel. This is a chat with subscribers where Defendants Schultz and Webb promote their success using their system to monetize unsuspecting women and girls without their consent, direct subscribers to the "Blueprints" and CreatorCore, and help subscribers on their journey to monetize unsuspecting women and girls. The CreatorCore Ai Models Telegram channel presently has 19,423 subscribers.

134. Defendants Webb and Schultz moderate these chats and are actively engaged in the chats.

135. In the chats are the ModelForge Defendants as well as other users and subscribers using AI ModelForge and CreatorCore to monetize unsuspecting women and girls without their consent.

136. Throughout the chats both Defendants Webb and Schultz use indistinguishable AI copies of Plaintiffs liberally to present their "Blueprints" and how to use CreatorCore to subscribers. Defendants Webb and Schultz use Plaintiffs to show how well the CreatorCore generative AI works in creating indistinguishable AI copies of unsuspecting women and girls without their consent. Further, Defendants Webb and Schultz use videos and images of Plaintiffs to exhibit CreatorCore's ability to generate sexually charged content. Plaintiffs are the template women that Defendants Webb and Schultz use to troubleshoot their CreatorCore software for their subscribers, and to exhibit its capabilities to their subscribers, including generating nude and NSFW images of Plaintiffs.
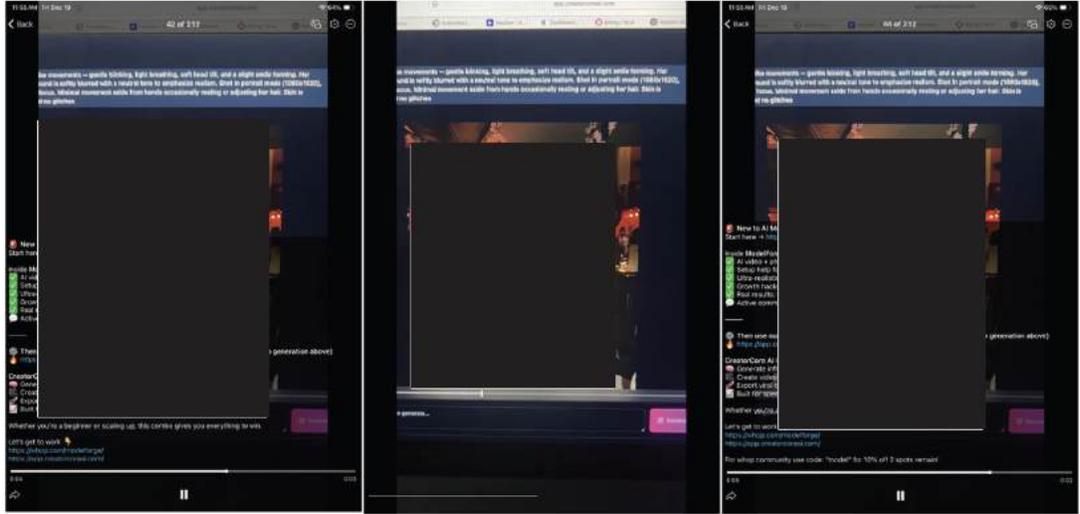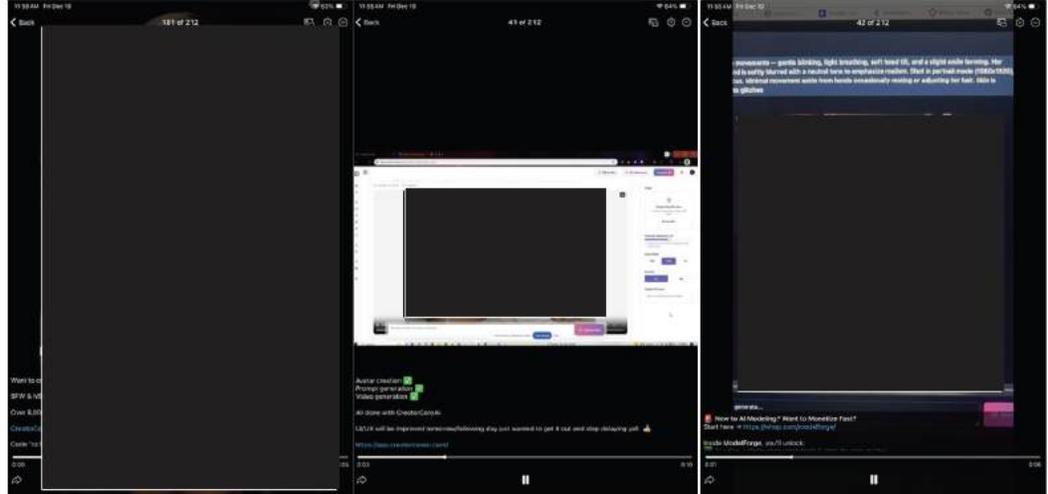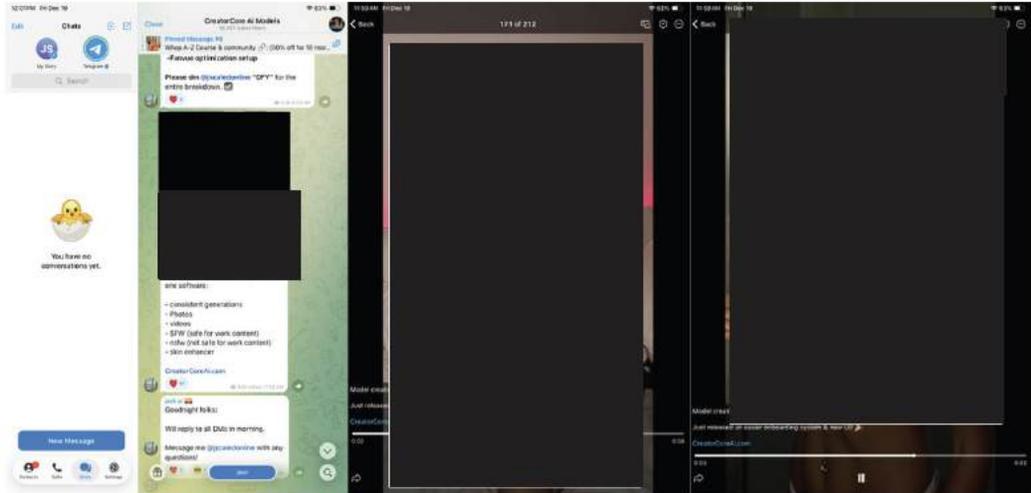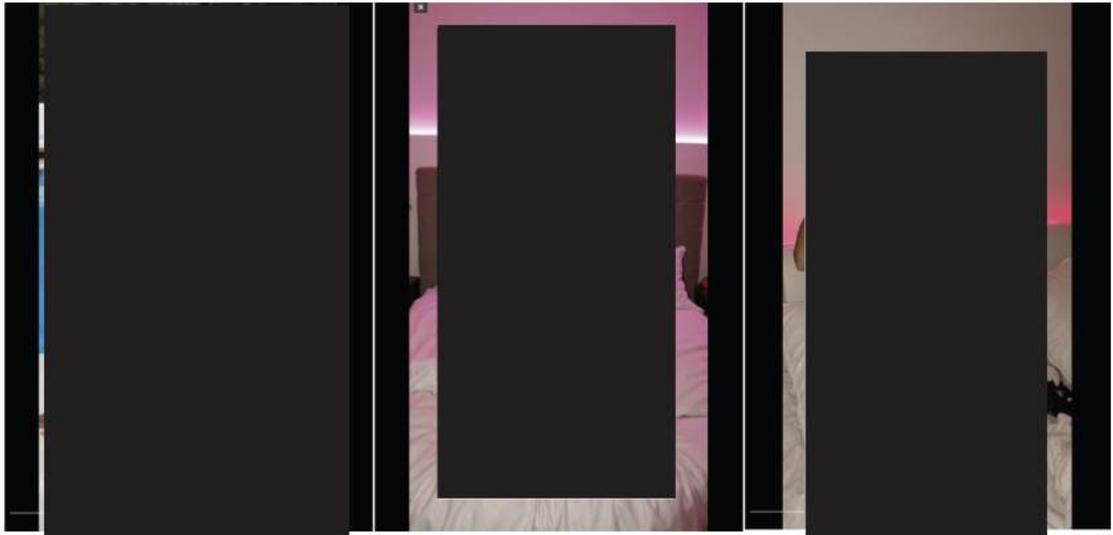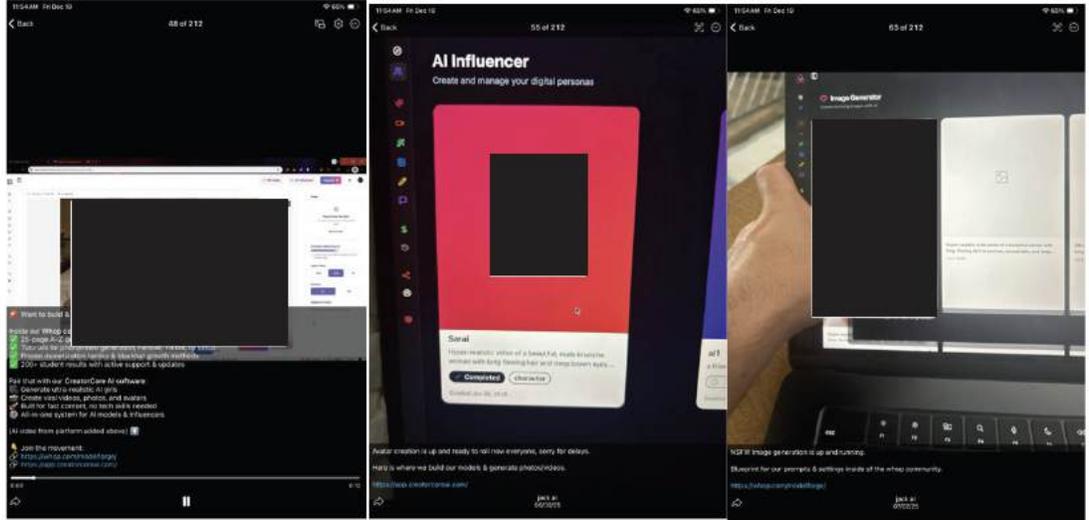
137. Defendants Webb and Schultz created an AI influencer for each Plaintiff on CreatorCore to generate images and videos of Plaintiffs. Because Defendants Webb and Schultz created an AI influencer of each Plaintiff they have taught CreatorCore AI how to consistently create images and videos of Plaintiffs, including NSFW generations.

138. Within the chats the ModelForge Defendants and subscribers discuss how they are selecting unsuspecting women and girls to exploit as their AI influencers. Discussions include taking images of women from Instagram, picking random girls from Reddit, using their ex-girlfriends, and simply matching with unsuspecting women and girls on Tinder and stealing images from their social media.

How to use CreatorCoreAi.com to prompt nsfw (bl...

Sat, Jun 28 at 12:08 PM

Vlados

I'm wondering how many of us used their ex as first model? :D can't create an influencer still on creatorcore :/

😂 1

Elijah L

🤣🤣🤣

I didn't even think of that, and yeah they're updating it. They released it really early just to get it out and now they're updating everything

How to use CreatorCoreAi.com to prompt nsfw (bl...

❤ 1

Elijah L
I'm pretty sure we can put a p...

Vlados

i have shit ton of nudes of ex so im set on that xddd

😂 1 ❤ 1

Elijah L

Even if it's not this fanvue/model acc

Vlados

that will be my revenge for her :D

Elijah L

😂😂😂😂

What'd she do to you bro

Vlados

left me for some rich dude

Elijah L

Damn :/ that's ass

But be careful with that, you don't want her being petty and coming after you for using her photos

Vlados

how would she know haha

she might recongnize cuz the model will be similar but i dont think so

Vlados
left me for some rich dude

Elijah L

Soon you'll be richer! Type shit

7:35 AM Mon Dec 22   71%

< Main Paid Chat

How to use CreatorCoreAi.com to prompt nsfw (bl...

Elijah L

Ye I litterally chose some random woman off Reddit

I'm thinking of using other popular ai models and going off of them

Litterally after that all I need is them to sub to my fanvue and follow my insta and tik tok handles

Compared to trying to get different photos of this very niche woman that looks very specific

Elijah L
I'm thinking of using other po...

Vlados

or here's another idea for you, sign up on tinder, match everyone and get some instas and copy from those poor girls)))

Elijah L

😂😂😂😂

You actually make em laugh so hard bro

Might be onto sum

Vlados

:DDDD

Vlados
literally my ex, although AI m...

AlBeau

Hahah

You boys are funny

Elijah L
This new video has been gen...

al.jack

This means is cracked

Chat is popping

Guys what do you think about a $250 giveaway to a member that does "x" amount of subs in a 30 day period or similar contests?

Write a message

-63-
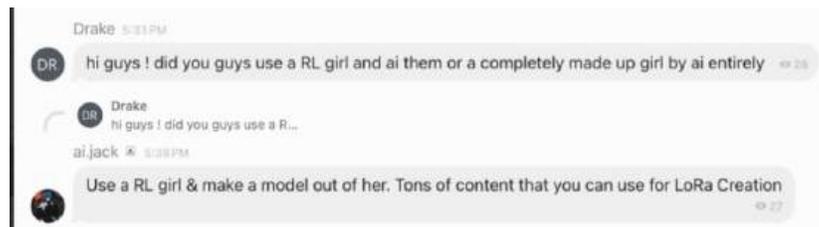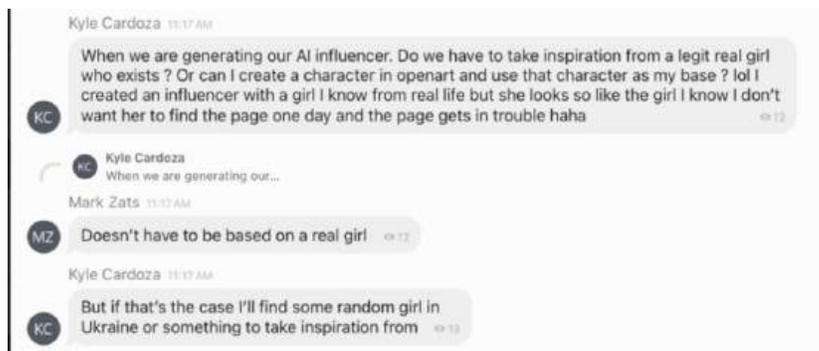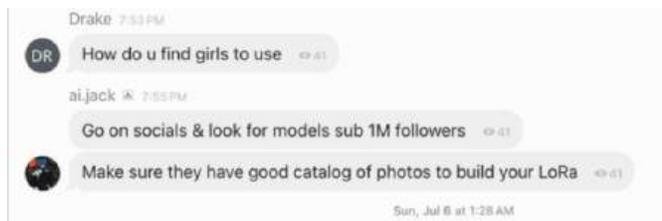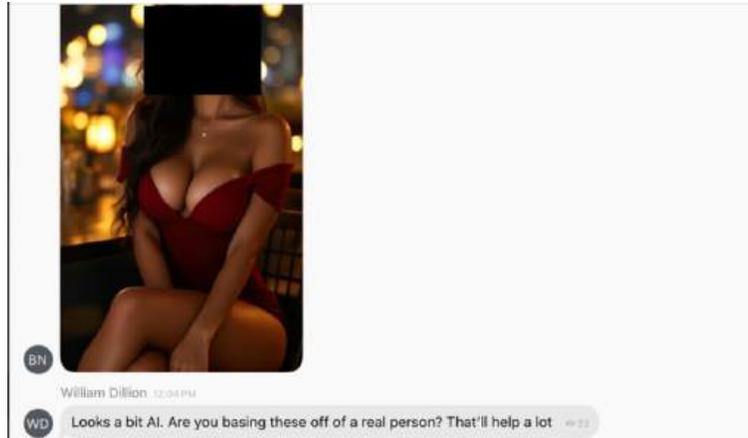
139.   Within the chats the ModelForge Defendants and their subscribers discuss the various ways they are going to use and degrade the unsuspecting women and girls they have selected without their consent. This includes using them to generate masturbation pornography, heterosexual pornography, homosexual pornography, bondage pornography, and pornography involving other fetishes, including foot fetishes and human excrement.
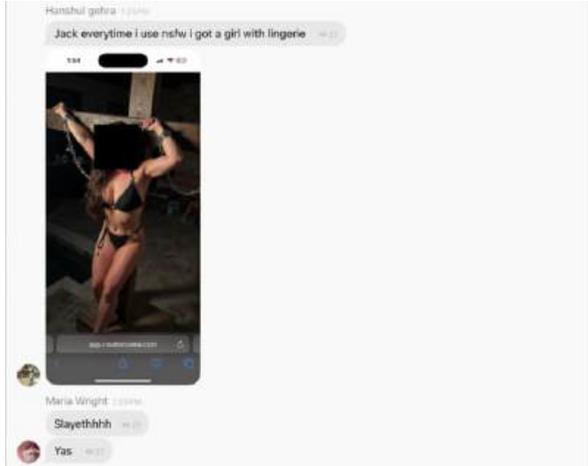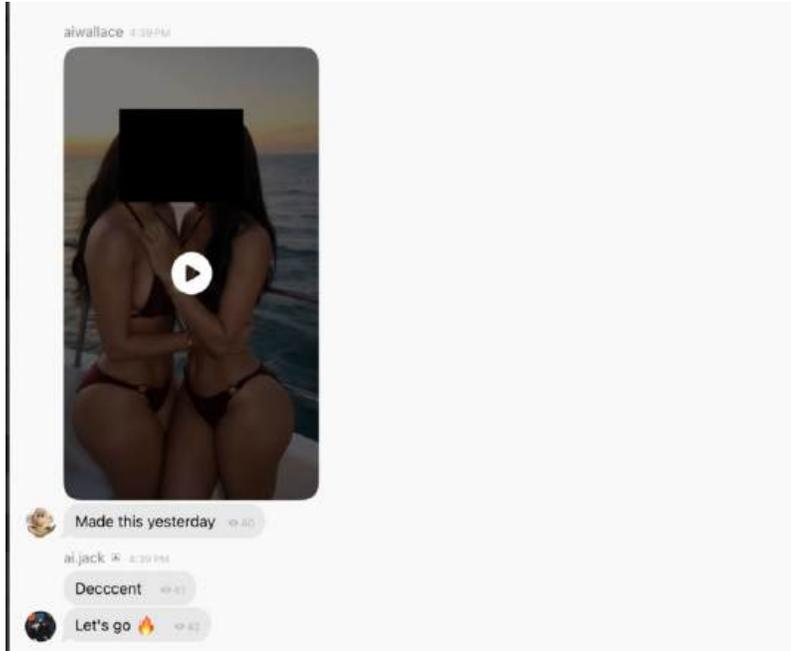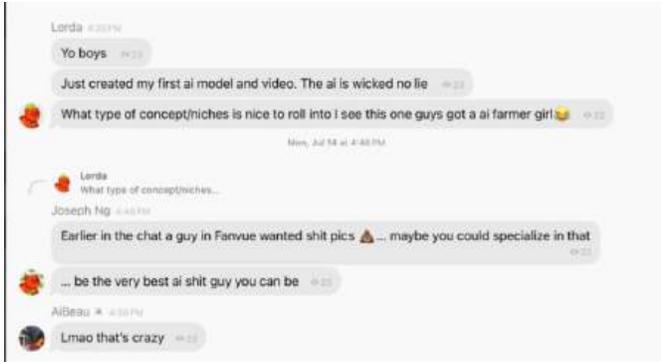
Lorda
Yo boys
Just created my first ai model and video. The ai is wicked no lie
What type of concept/niches is nice to roll into I see this one guys got a ai farmer girl

Mon, Jul 14 at 4:48 PM

Lorda
What type of concept/niches...

Joseph Ng
Earlier in the chat a guy in Fanvue wanted shit pics ... maybe you could specialize in that
... be the very best ai shit guy you can be

AiBeau
Lmao that's crazy

Jordan Režek
Thoughts on feet finder?

aiwallace
Made this yesterday

ai.jack
Decccent
Let's go

Hanshul gehra
Jack everytime i use nsfw i got a girl with lingerie

Maria Wright
Slayethhhh
Yas

-65-

So I'm gonna make an irish pale strawberry blonde who's a puppy girl. Target audience sexually repressed Arabs. Speaking from first hand experience inquiring with those motherfuckers and their porn kinks that's the way to go for them

Hanshul gehra

Yo guys is it possible for me to make this?

@ai.jack @AiBeau
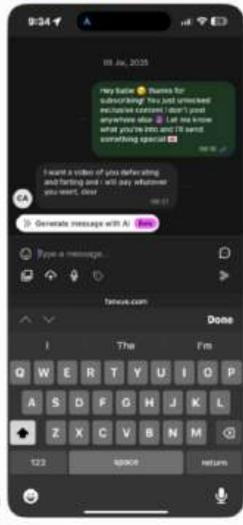
Ashapplecow

how do i use batch downloader for ig

ai.jack

It's possible but generation will be like $40/70 worth of software.

Tell him $150 if he is inclined I'll help u

LukeAI

Exactly that's the difference. With porn they can choose whatever they want- they come for the interaction.

cpacrusha

Fr, they want a connection, give them that then take their either bank account 😏😏

Maria Wright

If u have the time, vet them, find out their weaknesses, kinks and insecurities and exploit them. "Hey baby;) tell me more about you I'd love to get to know you and how to please you haha what are u into?

Then share
A glimpse of ur girl's kink. Like if ur making a puppy girl, "I love to be a good girl and submissive like a good little bitch for master 😇

Y'all need to make ur girls stand out pick a niche kink and develop tailor it to those motherfucker on g prolly gonna get more traction than any random slut w a page. Strategically

🔥 2

LukeAI

Agree with all this ^^

-66-

140.   The AI influencer monetization structure provided by the "Blueprints" and facilitated by CreatorCore allows sexually stimulated men to create the menu of what salacious content they would like to see from an AI influencer. This makes the possibilities regarding how an AI influencer may be used to be nearly endless. In one chat a man may be suggesting one fetish to be satisfied by the influencer, while a different man may be suggesting a totally different fetish in another chat. This means the AI influencer will be used to satisfy different fantasies based upon the whims of however many different men request them. It's not just posting an AI generated nude image of an unsuspecting woman or girl, it's stripping away that unsuspecting woman or girl's bodily autonomy to the point where anyone with a fantasy and a credit card can satisfy that fantasy with her likeness.

141.   Throughout the chats, Defendants Webb and Schultz celebrate supporting using unsuspecting women and girls in this capacity. Defendants Webb and Schultz never once chime in to deter a single user of their platforms from using unsuspecting women and girls in any way. Instead, Defendants Webb and Schultz promote stealing the images of real women and girls, promote using their images in creating kink and fetish pornography, and offer to help make kink and fetish pornography of these unsuspecting women and girls for a cost.

142.   Within the chats the ModelForge Defendants and their subscribers share NSFW AI generated images and videos depicting the AI influencers they have created using images of unsuspecting women and girls without their consent. The ModelForge Defendants and their subscribers have posted hundreds of NSFW images and videos of these unsuspecting women and girls in the chats, including images depicting the unsuspecting women and girls engaged in sex acts, homosexual acts, and various fetishes. Beyond the ModelForge Defendants posting images and videos of Plaintiffs, several subscribers to the chats have also used Plaintiffs as their AI influencers, and post images and videos of Plaintiffs in the chats.

i think it said the max was 15 so i added 15 with 3-4 nude , but i mean the creator core generator was making nudes then less last night and today after making a few SFW ones for instagram now even will all prompts it keeps her clothes on or a bikini randomly

starting to make them again just with basic prompt but hey if you guys can keep it simple

last 30-40 odd photos have been with long chat gpt prompts like the guide book says and for instgram purposes they have come up really well, just seeing what basic prompts allow the generator to execute , 2/3 aint bad just does struggle to produce the bottom half only but probably a LORA thing

ai.jack

Okay yes, I'd imagine if bottm half of body wasn't shown in Lora it's trying to build data off nothing so might give slight issue.

I will continue to work on inproving Lora's aswell.

there it is! i asked for the nipples to be realistic hahhaha @AiBeau

AiBeau
Perfect

There we go!

AiBeau
There we go!

Adam Freyr

with your experience is the upscale version better?

-71-

Should I stop talking to this guy ? He hasn't bought shit yet lol

KC Like what's up with these guys just wanting to talk ?

AiBeau 8:47 PM

You gotta be patient some times. Just needs to build trust

143. Again, Defendants Webb and Schultz strictly post motivational and technical support in response to the sharing of these images and videos.

144. Within the chats the ModelForge Defendants and their subscribers post success stories about the amount of money they are making by generating NSFW pornographic content of unsuspecting women and girls, such as Plaintiffs, for their Fanvue subscribers. The ModelForge Defendants and their subscribers celebrate their appropriation of images of unsuspecting women and girls and the proliferation of NSFW images and videos of these unsuspecting women and girls for profit. For the ModelForge Defendants and their subscribers, profit is the whole game and unsuspecting women and girls are merely objects to be used in any imaginable way to further the game without concern for the harms these women and girls will suffer. Winning the game is celebrated within the chats, no matter how lewd the conduct.

Tony Fortune 5:41PM
On the daily 🔥

OTIFICATIONS

Subscriptions   Tips

ⓢ New Subscriber
11 minutes ago

35
Jul 14
vue   www.fanvue...   8:36 p.m.
ow me your pussy

ai.jack 5:44PM
Let's go Tony!
❤ 1

cpacrusha 9:18 AM
Got my second sub today! Made $7.98 so far! Hey it's working! Not mad at all in only a couple weeks

🔥 1

Wait until @ai.jack hits us with the NFSW guide! Haha

cpacrusha
Got my second sub today! M...

AiBeau 9:20 AM
Let's goo

It's coming soon! I'm working on it

🔥 1

Repeats always come out to play at night 🔥

11:57
Purchased message $7.99 🎉
Chat   Media   Fan info

❤ 1 ❤ 1

AiBeau
Let's goo
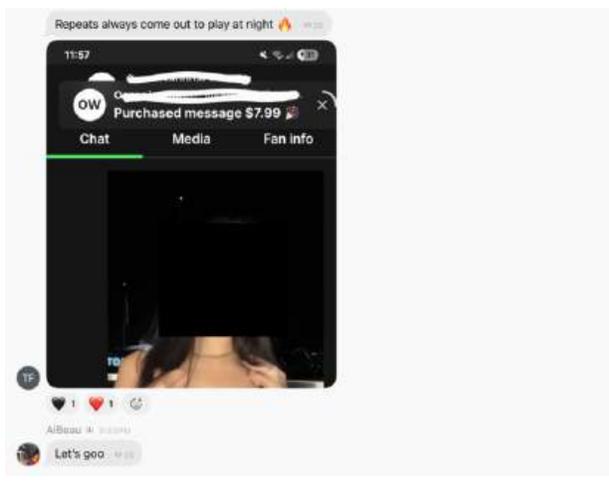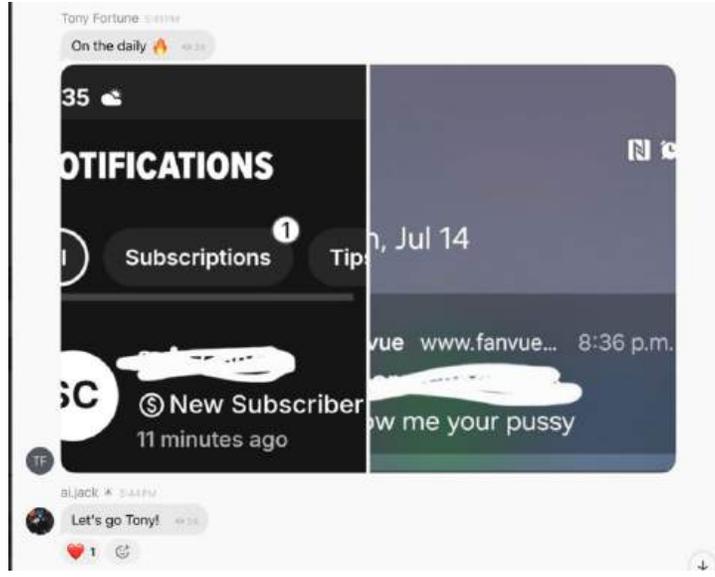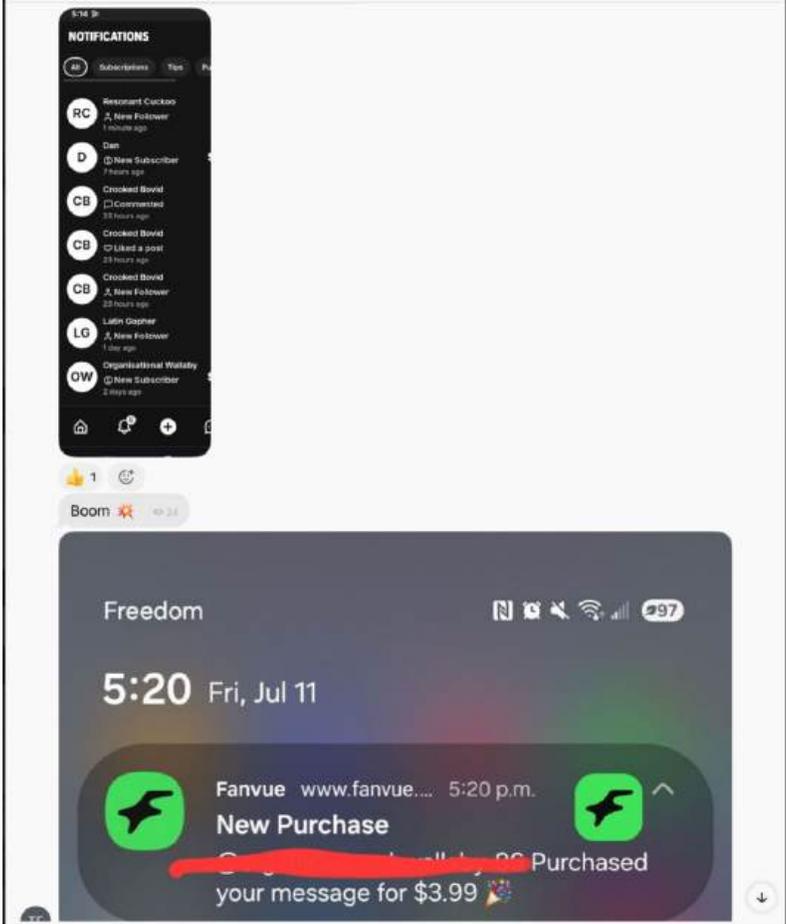
145.   The chats exhibit with incredible clarity that the ModelForge Defendants and their subscribers know what they are doing is illegal, gross, unethical, and morally deplorable, but that they choose to continue stealing women and girls' identities for profit to fund lavish lifestyles. The ModelForge Defendants and their subscribers acted and continue to act with an evil motive and reckless disregard for Plaintiffs and the other involved unsuspecting women and girls.

146.   One example of the ModelForge Defendants and their subscribers' evil motive within the chats is their expressions of utter disdain for women and their autonomy. These evil men and boys express unbelievable disrespect for women, and encourage each other to disrespect women.
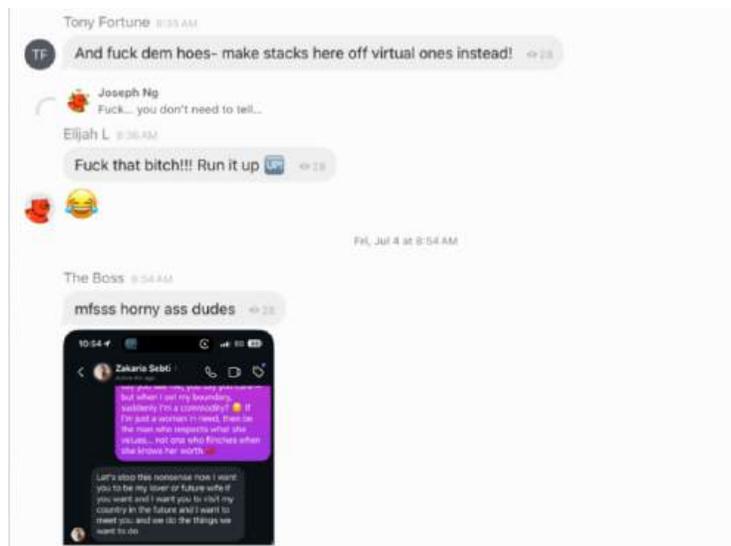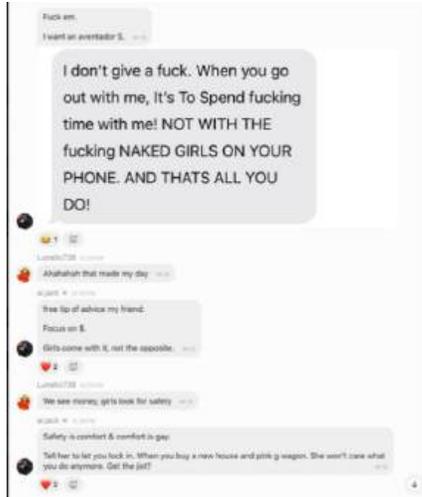
147. Another example of the ModelForge Defendants and their subscribers' evil motive within the chats surrounds the discussion of payment processors. The ModelForge Defendants originally used Stripe to process payments for CreatorCore. At a certain point the

number of payments processed tripped a security screening for Stripe to examine CreatorCore's business model. Stripe determined it would not continue processing payments for CreatorCore due to the business's facilitation of appropriating unsuspecting women and girls' likenesses to generate AI pornography of them without their consent. The ModelForge Defendants then embarked on a search for a new payment processor who would allow them to continue appropriating unsuspecting women and girls to generate pornography without their consent.

148. For the ModelForge Defendants, eliminating NSFW generations from CreatorCore was a deal-breaker which would destroy the profitability of their businesses. As such, the ModelForge Defendants refused to remove NSFW generation from CreatorCore.

149. During this search for a new payment processor the ModelForge Defendants were rejected by over ten separate payment processors due to CreatorCore's NSFW generative AI.

150. Despite being told to remove NSFW generations by over ten separate payment processing companies who rejected their business because of CreatorCore's NSFW generative AI of unsuspecting women and girls, the ModelForge Defendants refused to remove CreatorCore's NSFW generative AI capability. This shows directly the evil motive of the ModelForge Defendants. After being told over ten times by businesses that NSFW generations of unsuspecting women and girls was unethical and wrong, they fought to maintain NSFW generations for themselves and their subscribers for profit and pleasure rather than changing their businesses and removing NSFW generations.

151. While the ModelForge Defendants were unethically fighting to keep NSFW generations as a part of their business model for the purpose of profit, CreatorCore was shut down. Within the chats during this time the ModelForge Defendants and their subscribers were lamenting the fact they could not generate NSFW content of the unsuspecting women and girls for the customers of their pornographic subscriber sites. The ModelForge Defendants posted several times about this fight to maintain NSFW generation capability in CreatorCore, and how they had been rejected by payment processors because of NSFW generations. The ModelForge Defendants and their subscribers, rather than accepting this message about their morally

bankrupt actions and ceasing them, complained that they could not generate NSFW images and videos of unsuspecting women and girls and incessantly questioned when they would be able to resume their morally bankrupt and evil acts. This again is a direct showing of the evil motive and reckless disregard for unsuspecting women and girls by the ModelForge Defendants and their subscribers.
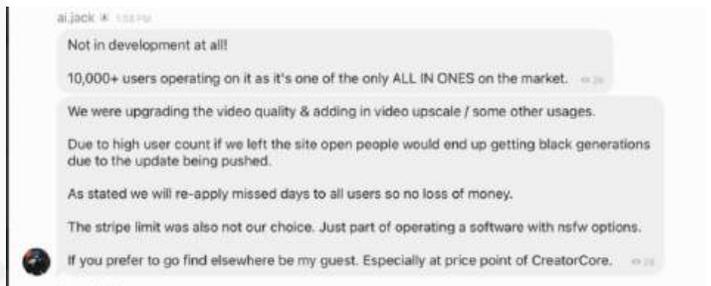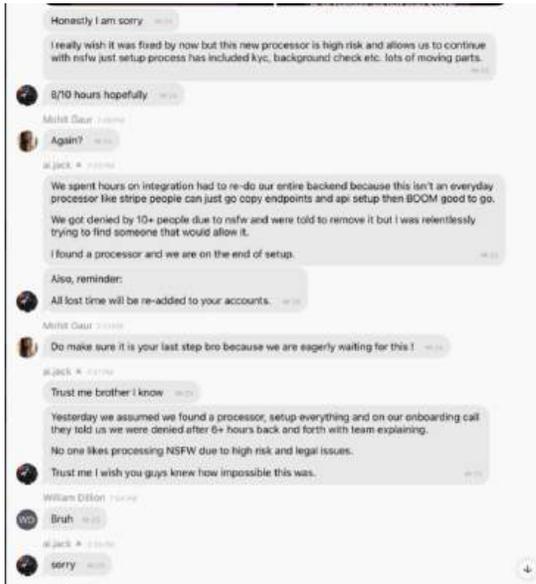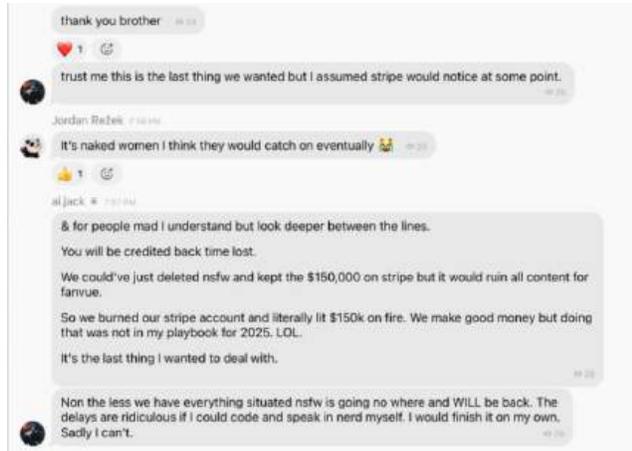
152. Another example of the ModelForge Defendants' evil motive and knowledge of their wrongdoing is their expressions of concern about the legality of CreatorCore and AI ModelForge. The ModelForge Defendants and their subscribers know they could potentially be sued for using indistinguishable AI copies of unsuspecting women and girls without their

consent. Rather than stop their bad acts that could lead to a suit, such as this one, the ModelForge Defendants and their subscribers justified their actions within the chats.

Ethics & Responsibility FIRST

Before we create NSFW content, understand this:

Legal & Ethical Guidelines

✅ **ALLOWED:**

- Creating AI-generated adult content for legal adult platforms (Fanvue)
- Selling NSFW content to verified adults (18+)
- Using AI models that don't resemble real people closely

❌ **NOT ALLOWED / ILLEGAL:**

- Creating content resembling real people without consent
- Creating content of minors (instant legal trouble)
- Posting NSFW to platforms that ban it (Instagram, TikTok)
- Misrepresenting AI content as real person

⚠️ **CRITICAL:** Only use NSFW content on Fanvue (or similar adult platforms). NEVER on Instagram, TikTok, Snapchat, or public platforms. Your accounts WILL be permanently banned.

⚠️ **CRITICAL LEGAL WARNING:** If you use someone "popular" or well-known (celebrities, major influencers), you MUST change the AI output significantly to avoid copyright/likeness issues. It's MUCH safer to use lesser-known models or Instagram micro-influencers (5K-50K followers).

💡 **PRO TIP:** Micro-influencers (5K-50K followers) are perfect because they have professional-quality photos but aren't famous enough to cause legal issues. Plus, they often have diverse content!

153. Further evidence of this evil motive, several users questioned having their AI influencers looking exactly like the women and girls from whom they stole images.

Elijah L
Yeah or use an old instagram account

CJ Washington
Have y'all ever gotten into a situation where the actual girl seen your ai page and threatened to take legal action?

Elijah L
Well, if it's original content and ai I don't think they can

If you take a photo of a woman, have chat gpt ai prompt it, she's gonna look slightly different and it won't be the exact same content you took

Adam Freyr
is it okay if the model look the same, she has 20k followers

@ai.jack

Wed, Jul 16 at 8:44 AM

Adam Freyr
is it okay if the model look th...

ai.jack
Yes

👍 1

Davit Jikia
And also can I change facial details so that my model doesn't look exactly like the model I took pictures from?

right now generated and real models look exactly the same.

Mon, Jul 7 at 1:41 PM

154.   The ModelForge Defendants evil motive and reckless indifference for the harm caused to others is also indicated as they know and express that they need consent from unsuspecting women and girls in order to use their likenesses in CreatorCore and beyond. Within Defendant CreatorCore's Terms of Service they state "5. Prohibited Use: You agree NOT to: Use the platform to generate content involving real individuals without consent; Upload or train models on illegal, harmful, or exploitative material." Not only do the ModelForge Defendants know full well CreatorCore is being used in violation of both of these prohibited uses, but they specifically instruct their subscribers to use CreatorCore in violation of both of these prohibited uses, and are repeatedly told in the chats their users are violating these prohibited uses. The ModelForge Defendants do absolutely nothing to enforce their prohibited uses, and instead consistently voice their support and willingness to help facilitate these prohibited uses.

```
5. Prohibited Use

You agree NOT to:
    • Use the platform to generate content involving real individuals without consent
    • Upload or train models on illegal, harmful, or exploitative material
    • Attempt to reverse-engineer, scrape, or overload our systems
    • Use our platform to create or distribute content intended to deceive, harass, or defame

We reserve the right to moderate or remove any content we deem inappropriate, illegal, or in violation of these Terms.
```

155.   The ModelForge Defendants have direct messaging capabilities with each other and their subscribers. These direct messages are not public like the remainder of the chats, however, upon information and belief, they are used to share images and videos of unsuspecting women and girls, including NSFW images and videos, to help subscribers troubleshoot issues with the ModelForge Defendants in order to create the most realistic and indistinguishable AI copies of unsuspecting women and girls, and to help subscribers increase their business and further the proliferation of their stolen AI influencers to more men worldwide.

156.   The ModelForge Defendants also sell "Done for You" [hereinafter "DFY"] packages to their subscribers within the chats. Within DFY packages, the ModelForge Defendants create an AI influencer of an unsuspecting woman or girl, including Plaintiffs, and

generate images and videos of the AI influencer within CreatorCore to prepare the AI influencer for ease of use and monetization by the purchaser. The ModelForge Defendants setup social media accounts and gain followers for the DFY AI influencer. The ModelForge Defendants generate NSFW content and build out a Fanvue page for the DFY AI influencer depicting an unsuspecting woman or girl without her consent. The ModelForge Defendants are selling a package of a ready to use AI influencer of an unsuspecting woman or girl which has been entirely built out by the ModelForge Defendants. This AI influencer is uploaded into the purchaser's account on CreatorCore and the purchaser can use the indistinguishable AI copy of this unsuspecting woman or girl to do with them as they please. Again, this is indicative of an evil motive and reckless disregard for unsuspecting women and girls.
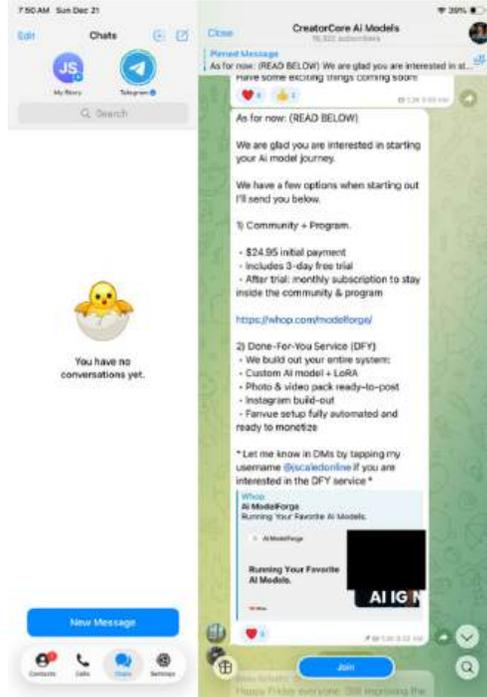
CreatorCore AI and FAL AI

157.   Defendant CreatorCore is a generative AI platform created by Defendants Webb and Schultz strictly for the purpose of generating AI influencers from unsuspecting women and girls without their consent. Defendant CreatorCore is an all-in-one AI platform created and maintained strictly for the purpose of generating NSFW and pornographic images and videos

of unsuspecting women and girls without their consent. Once an AI influencer is generated within CreatorCore, that indistinguishable AI copy of an unsuspecting woman or girl can be used along with a written prompt to generate any type of image or video of that woman or girl, including sexually provocative content and NSFW content.

158.   Defendant CreatorCore's generative AI platform is a product.

159.   Defendant CreatorCore accepts monthly subscription payments from its subscribers in exchange for the capability to generate AI influencers from unsuspecting women and girls without their consent. Subscribers to Defendant CreatorCore must pay for a higher level subscription to receive NSFW capabilities. Subscribers use credits, provided to them based upon the level of subscription they have purchased, to generate AI influencers, images, videos, and NSFW images and videos.

160.   Within Defendant CreatorCore's generative AI platform it is one-hundred percent necessary to generate an AI influencer if a user wants to have the same girl in every single photo and every single video they generate. Further, in order to create a NSFW video of a woman or girl, you must first create a NSFW image of the AI influencer to be used to create the video.

161.   It is critical to CreatorCore and the AI influencer business model that the AI girls appear real and have a consistent appearance. The ModelForge Defendants' "Blueprints" instruct subscribers to use multiple images of a real woman or girl to create their AI influencer in CreatorCore so the AI influencer appears real and consistent. CreatorCore is specifically designed to generate indistinguishable AI copies of real women or girls, and to ensure the AI influencer's appearance is consistent across multiple AI generations.

162.   CreatorCore is specifically designed to appropriate women's identities and likenesses for its users to cosplay as who they've always wanted to be with no restrictions on its generative AI capabilities to bring their wildest fantasies to life with consistent lifelike AI influencers depicting women taken from the internet. On the CreatorCore homepage, Plaintiffs M.G. and H.B. are pictured.
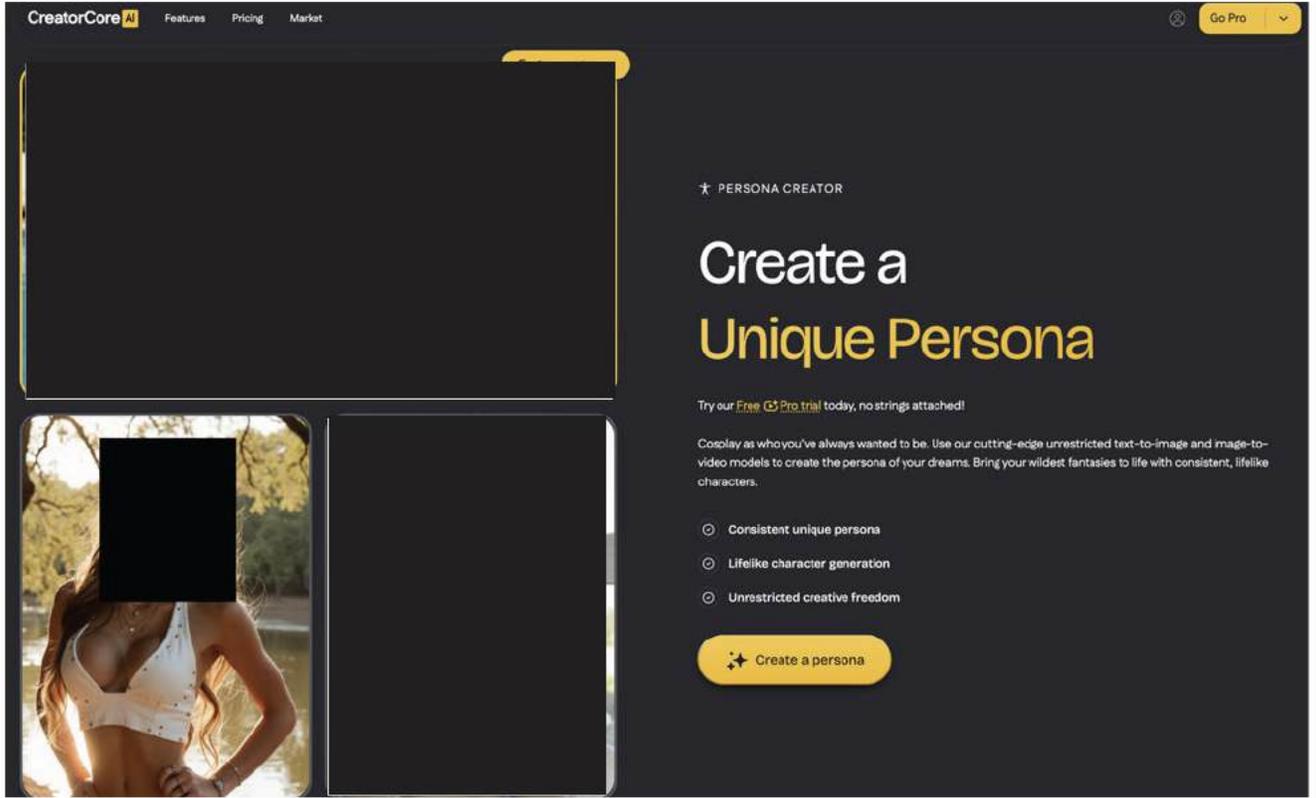
163. Defendant CreatorCore's credits are monthly, and expire at the end of the month. This encourages subscribers to generate as much as they can during a given month in order to avoid losing money with unused credits at the end of the month. Defendant CreatorCore boasts about having over 500,000 images and videos of unsuspecting women and girls generated in a single 30-day period.

Use your AI influencer to generate unlimited photo & video content — SFW or NSFW.

Create an Influencer ›   View Pricing

1,000+ influencers created this week

🏆 #1 AI Influencer Generator
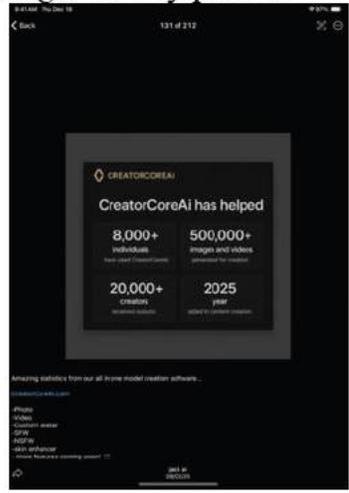
164. Defendant CreatorCore subscribers have generated over 1000 AI influencers from unsuspecting women and girls in the last week. This is over 1000 unsuspecting women and girls who have had their bodily autonomies stolen from them in the past week.

165. Defendant CreatorCore is responsible for the likenesses of over 52,000 women and girls being stolen to generate over 6,000,000 images and videos of unsuspecting girls and women without their consent in a given year.

166. Defendant CreatorCore also sells pre-trained "LoRA's" [Low Rank Adaptations] of unsuspecting women and girls within the CreatorCore platform. Currently available for purchase is Plaintiff H.R. as a pre-trained AI influencer, and, upon information and belief, Plaintiffs M.G. and H.B. have been sold as pre-trained AI influencers by Defendant CreatorCore and the ModelForge Defendants. A purchaser of a pre-trained AI influencer has control over that unsuspecting woman or girl's image to do with it as they please including generating NSFW images and videos of that woman or girl, creating social media accounts with her image, and creating pornographic subscription accounts with her image. Being sold as a pre-trained AI influencer within CreatorCore greatly increases the number of predatory men and boys with access to that specific woman's image to do with it as they please as it eliminates the step of the subscriber having to identify a woman online to steal images from, and provides to them a ready-made AI influencer. A number of users within the chats have shared images and videos of Plaintiffs they have generated which are indistinguishable from Plaintiffs. This indicates there are several predatory CreatorCore subscribers using Plaintiffs to generate images and videos of Plaintiffs which are indistinguishable from Plaintiffs.
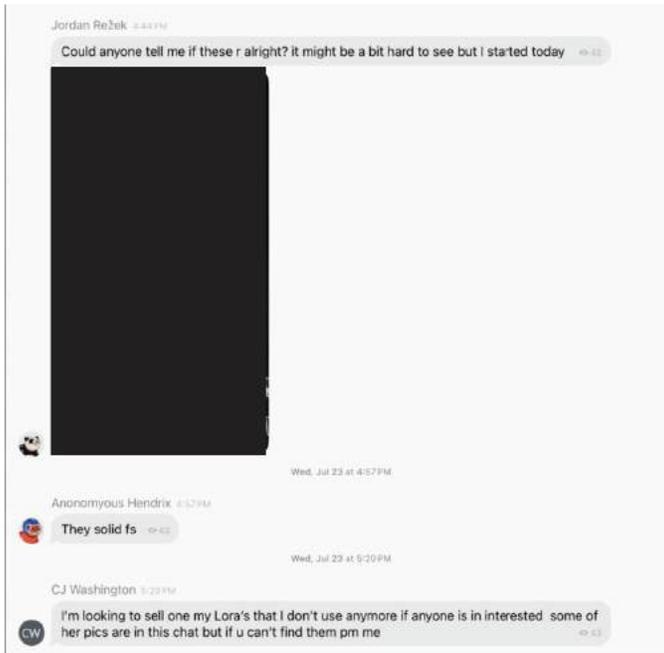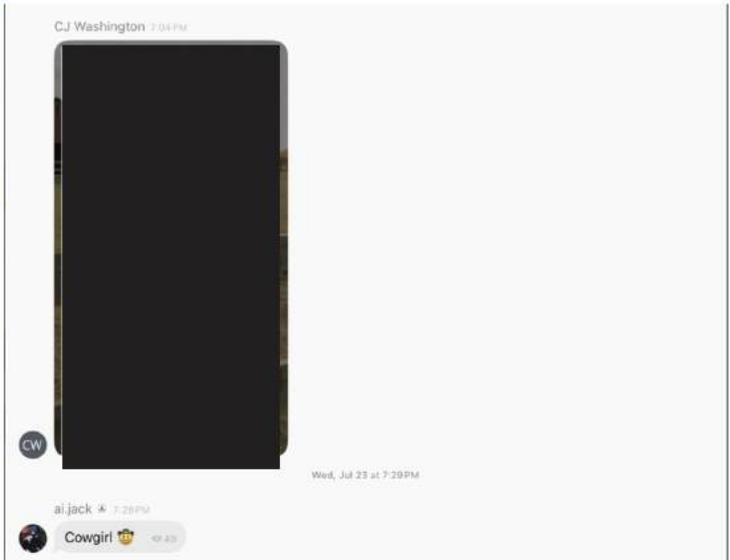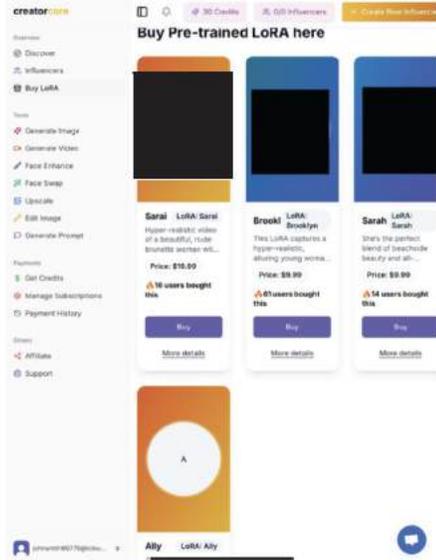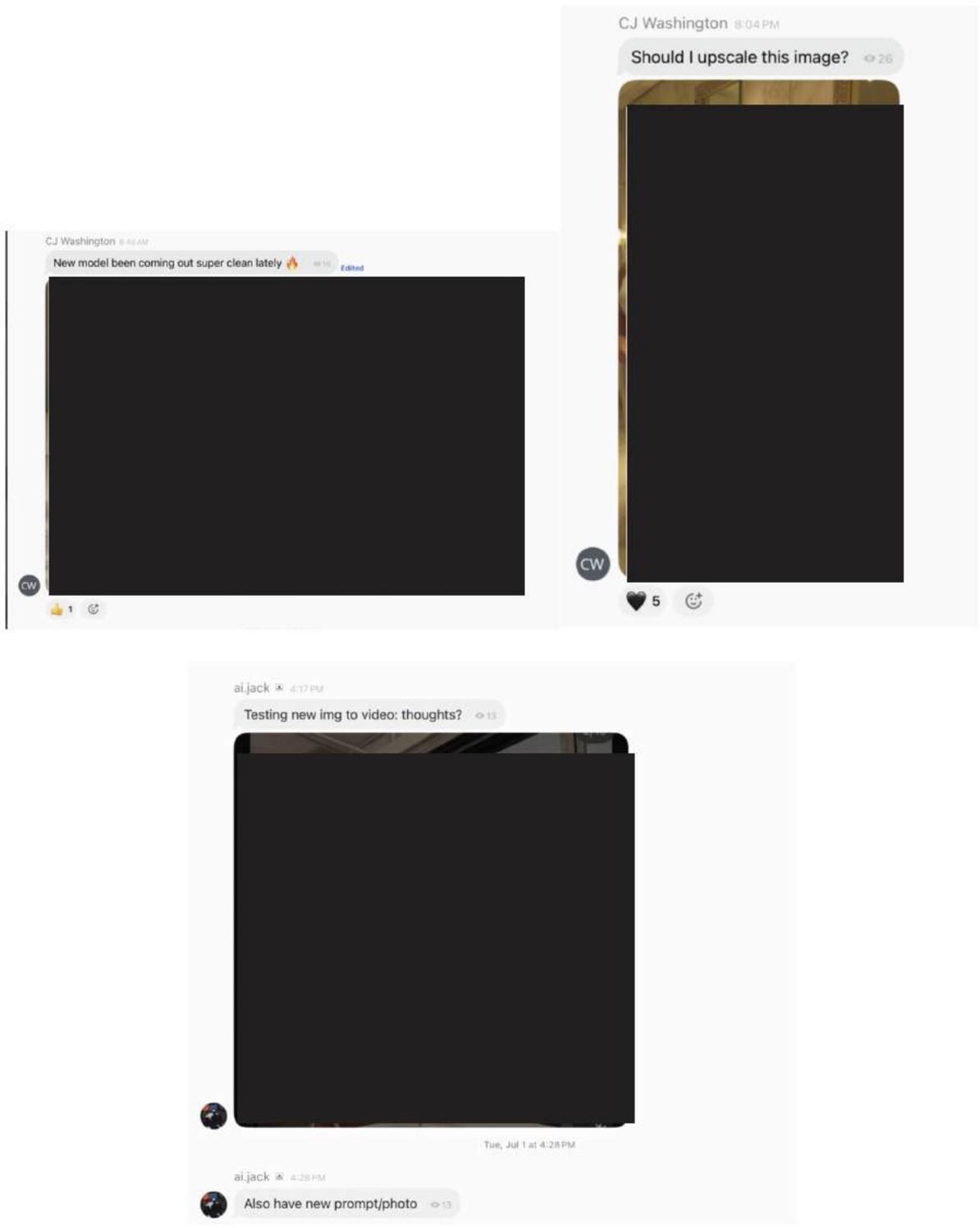
167.   Once a subscriber to Defendant CreatorCore's platform has generated an AI influencer from completely clothed images of an unsuspecting woman or girl, it takes seconds to remove her clothes and generate nude NSFW images of that previously clothed woman.

Defendant CreatorCore's generative AI platform does not need a nude image of the unsuspecting woman or girl to generate nude images and videos of said unsuspecting woman or girl. Defendant CreatorCore's generative AI platform does remove clothing from unsuspecting women and girls and facilitates users removing clothing from unsuspecting women and girls without their consent.
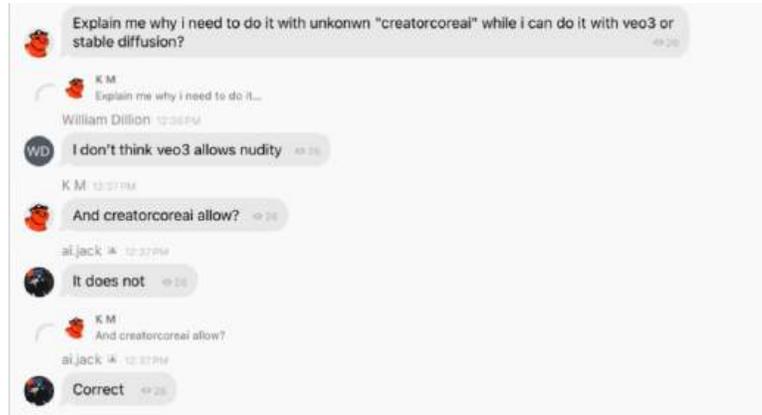
168.   Unsuspecting women and girls, including Plaintiffs, who have chosen not to take, share, or post nude images of themselves are disrobed by Defendant CreatorCore's generative AI platform for subscribers to either use personally, share publicly, or sell.

169.   Once a predatory CreatorCore subscriber has generated a nude image of an unsuspecting woman or girl, they are then able to use said nude image within Defendant CreatorCore's generative AI platform to generate nude videos of said unsuspecting woman or girl without their consent. These videos can fall anywhere on the spectrum of NSFW content and can be used by the creator however they choose.

170.   Defendant CreatorCore is a platform that is built on Defendant FAL's generative AI models, which, upon information and belief, are designed and manufactured by Defendants John Doe 4 – ByteDance and John Doe 5 - WAN. When an image or video is created in CreatorCore, including NSFW, it is hosted on Defendant FAL's servers with an FAL URL.
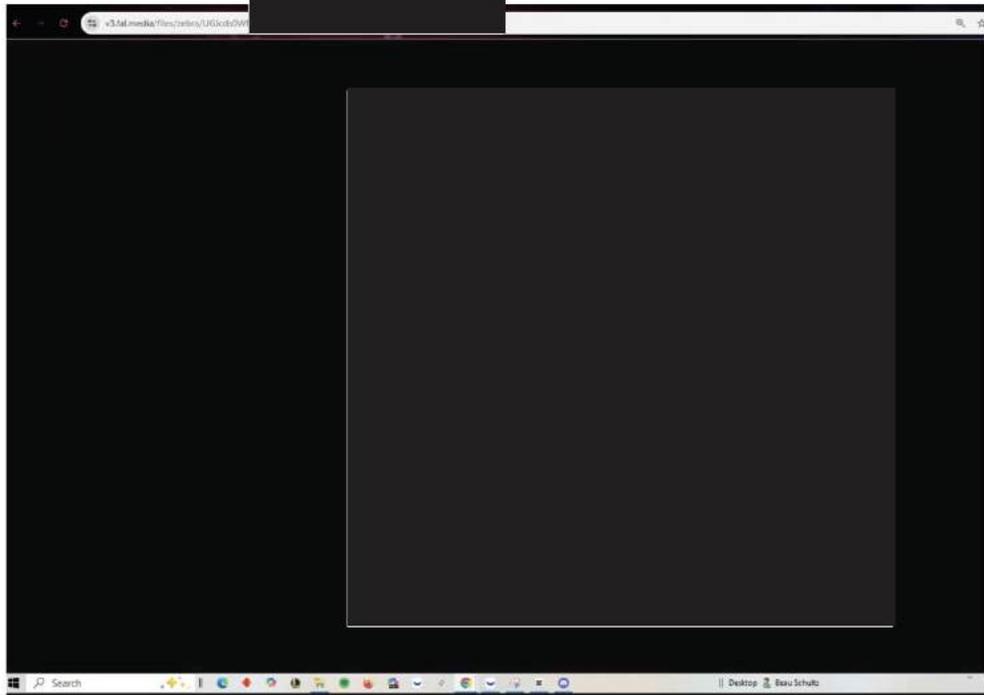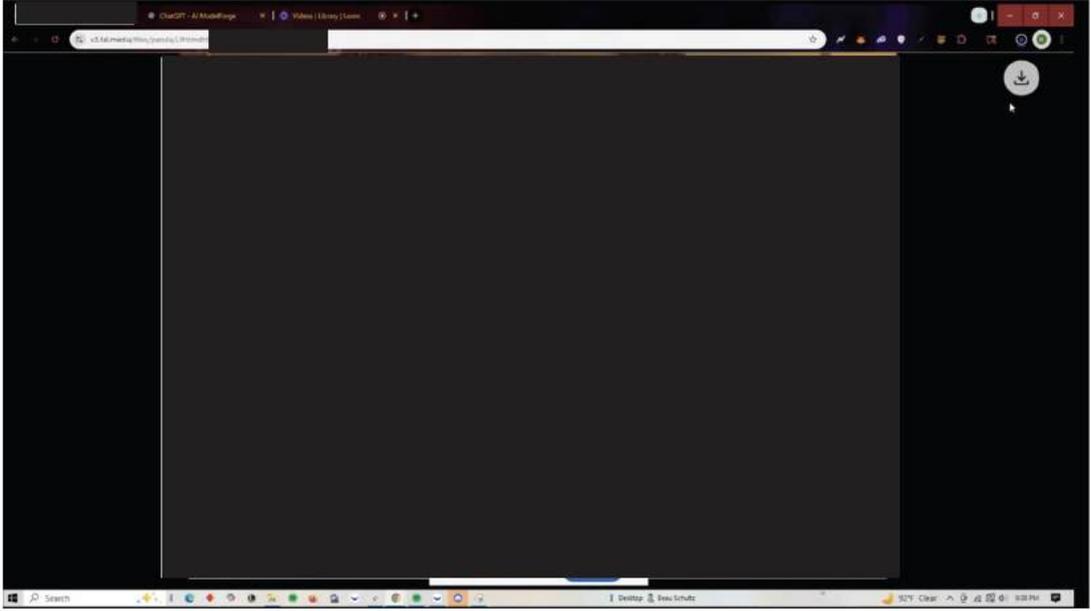
171. Further, the AI host for NSFW video generation on Defendant CreatorCore's generative AI is listed as "WAN NSFW" and "ByteDance NSFW" which are references to Defendant FAL's WAN image to video generator and ByteDance video generator.

172. Defendant FAL's generative AI models are products for the purposes of Arizona's products liability law.

173. The ModelForge Defendants specifically built CreatorCore on Defendant FAL's generative AI models as Defendant FAL's generative AI models fail to have in place important guardrails to prevent against the generation of NSFW images of unsuspecting women and girls. The failure to add this incredibly important safety guardrail, as other generative AI companies have done, made Defendant FAL's generative AI models the specific choice of the ModelForge Defendants when building Defendant CreatorCore's generative AI platform.

174. Defendant FAL's failure to install a critically important guardrail protecting against removing clothing from unsuspecting women and girls, and the generation of indistinguishable AI copies of unsuspecting women and girls makes Defendant FAL's generative AI models unreasonably dangerous when they are put to the reasonably anticipated use of generating NSFW images and videos of unsuspecting women and girls. This use is so foreseeable, that the ModelForge Defendants specifically chose FAL's generative AI models for this purpose.

175. Defendant CreatorCore has a 17 minute and 38 second video how to use CreatorCore on its website. This video is also posted at ███████████████████████████ and goes into specifics of how to generate an AI influencer on CreatorCore, generation of images and generation of videos on CreatorCore.

Phyziro

176. Defendant Phyziro is the payment processor for the ModelForge Defendants. The ModelForge Defendants were rejected by over ten payment processors because those payment processing companies refused to process payments for a company facilitating the use of generative AI to remove clothing from unsuspecting women without their consent to generate NSFW images and videos. Defendant Phyziro, knowing the ModelForge Defendants were providing a how-to Blueprint and the tools to create nude images and videos of unsuspecting

women and girls without their consent, and knowing the ModelForge Defendants had been rejected by 10+ payment processing companies for this very reason, chose to look the other way regarding the ModelForge Defendants' business and agreed to process payments for the ModelForge Defendants' businesses. Defendant Phyziro knew this was wrong and harmful to the innocent women involved, but chose profit over doing what was right.

177. During the time when the ModelForge Defendants and CreatorCore were searching for a payment processor who would allow CreatorCore to maintain its generative AI's capability to remove clothing from unsuspecting women and girls, CreatorCore was shut down. No NSFW images or videos of unsuspecting women or girls were generated while CreatorCore was without a payment processor.

178. The ModelForge Defendants would not have been able to profit from the exploitation of unsuspecting women and girls through NSFW generations by the ModelForge Defendants and their subscribers had Phyziro not taken the high risk step of agreeing to process payments for the ModelForge Defendants knowing they were using generative AI to create NSFW images and videos of unsuspecting women and girls without their consent.

Damages

179. Plaintiffs have been harmed in several different ways as a result of Defendants' conduct.

    a. As a result of Defendants' conduct and dangerous products, images and videos of Plaintiffs, indistinguishable from the Plaintiffs' real images and videos, have been proliferated across the internet. Plaintiffs have lost control of their own image and had their bodily autonomy ripped from their possession.

    b. As a result of Defendants' conduct and dangerous products, Plaintiffs have been used as the marketing faces of the very products used to appropriate their likenesses and create NSFW images and videos of Plaintiffs without their knowledge or consent. Further, Plaintiffs' have been involuntarily adopted as the

face of the Defendants' companies which are being used to harm thousands of unsuspecting women and girls without their knowledge or consent.

c. As a result of Defendants' conduct and dangerous products Plaintiffs have suffered harms and losses resulting from NSFW nude images and videos being generated of them for the personal use of Defendants and other men. Plaintiffs have suffered as a result of losing control over who can see them nude. Plaintiffs have suffered as a result of losing control over the privacy of their own bodies and who they choose to share their bodies with. This is harm that Plaintiffs may never know the full extent of.

d. As a result of Defendants' conduct and dangerous products, Plaintiffs have lost bodily autonomy, and as a result, Plaintiffs have suffered harms and losses resulting from the uncertainty as to how their image has been used by predatory men, the magnitude of which Plaintiffs may never fully know. Plaintiffs have lost control over what images and videos of them exist and have been published and shared. Plaintiffs have lost control over what is depicted in those images and videos or what they are shown doing in those images or videos. It is likely the extent of this harm will never be fully known by Plaintiffs.

e. As a result of Defendants' conduct and dangerous products, Plaintiffs have lost control over who they choose to interact with, and who believes they have interacted with Plaintiffs. Plaintiffs have lost control over who believes they have a relationship and/or sexual relationship with Plaintiffs. This has harmed Plaintiffs by depriving them of their autonomy as to with whom they choose to interact. Further, this has harmed Plaintiffs as predatory men on the internet are being manipulated to believe they have a sexually charged relationship with Plaintiffs through the Fanvue chats and interactions. They believe they have spent thousands of dollars on Plaintiffs, individually. This poses a serious physical danger to Plaintiffs in the instance they were to ever happen upon or be tracked

down by one of these predatory men in-person. Plaintiffs are now forced to live with the fear of not just wondering who all has seen sexual NSFW images and videos of them, but who out there believes they are engaged in a sexually charged relationship with Plaintiffs that they have spent hundreds or thousands of dollars on.

f. Defendants have used Plaintiffs' likenesses to accrue tens of millions of views on social media accounts and have wrongfully profited from Plaintiffs' images solely from monetizing those views alone. Beyond that monetization, their use of Plaintiffs' images without attribution deprived Plaintiffs of significant sums of money from social media posts.

g. As a result of Defendants conduct and dangerous products, Plaintiffs have suffered serious emotional distress and mental anguish.

h. Defendants have used Plaintiffs' likenesses to drive business to the ModelForge Defendants' AI ModelForge and CreatorCore businesses. Plaintiffs would never have permitted their images being used for business that is this harmful to women, and Plaintiffs have suffered harms and losses as a result of being the unwilling and non-consenting faces of these disgusting businesses.

COUNT I
Negligence
Plaintiffs M.G., H.R., & H.B. v. Defendants
Webb, Schultz, Lucas Webb, & John Doe 2 - Noah

180. Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

181. Defendants Webb and Schultz created and maintained Defendants AI ModelForge and CreatorCore. Defendants Webb and Schultz also created and maintained an agency of AI influencers, including Plaintiffs, which they monetized through use of social media and subscription pornographic websites, such as Fanvue. Defendants Webb and Schultz

created and maintained personal social media profiles which were used for the purpose of monetizing Plaintiffs.

182.   Defendants Lucas Webb and John Doe 2 - Noah utilized Defendant CreatorCore's services to generate AI influencers, including Plaintiffs, which he monetized through use of social media and subscription pornographic websites such as Fanvue. Defendant Lucas Webb created and maintained personal social media profiles which were used for the purpose of monetizing Plaintiffs through Defendants Webb, Schultz, AI ModelForge and CreatorCore. Defendant Lucas Webb would use images of Plaintiffs to drive traffic through his personal social media profiles to Defendant AI ModelForge and CreatorCore's platforms while earning affiliation marketing payments from Defendants Webb, Schultz, AI ModelForge and CreatorCore.

183.   Defendants Webb, Schultz, Lucas Webb, and John Doe 2 – Noah used Plaintiffs' clothed images to generate NSFW images and videos of Plaintiffs which were subsequently published.

184.   Defendants Webb, Schultz, Lucas Webb, and John Does 2 - Noah owed a duty of ordinary care to Plaintiffs.

185.   Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah breached this duty owed to Plaintiffs and were thereby negligent in the following respects:

     a. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah found and downloaded images of Plaintiffs from social media for the purpose using generative AI to create AI influencers of Plaintiffs which are indistinguishable from Plaintiffs without the consent of Plaintiffs;

     b. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah used CreatorCore to generate indistinguishable AI copies of Plaintiffs;

     c. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah used other generative AI models to generate indistinguishable AI copies of Plaintiffs;

d. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah used indistinguishable AI copies of Plaintiffs to create and maintain social media profiles depicting Plaintiffs for the purpose of profiting from the social media sites, and driving traffic to subscription pornographic sites depicting Plaintiffs, such as on Fanvue;

e. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 – Noah took fully-clothed images of Plaintiffs without Plaintiffs' consent and used CreatorCore or other generative AI models to remove Plaintiffs' clothes and generate NSFW images and videos of Plaintiffs;

f. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah used Defendant CreatorCore's generative AI or other generative AI models to create and maintain NSFW images and videos of Plaintiffs;

g. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah used NSFW images and videos of Plaintiffs created with CreatorCore or other generative AI models to create and maintain subscription pornographic website profiles depicting Plaintiffs for the profit of Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah;

h. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah used their personal social media accounts to drive traffic to Defendants AI ModelForge and CreatorCore by posting sexualized images of Plaintiffs to their personal social media in advertisements for AI ModelForge and CreatorCore;

i. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah personally used CreatorCore and other generative AI models to create indistinguishable AI copies of Plaintiffs for the purpose of selling AI ModelForge and CreatorCore for their own personal profits;

j. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah personally used CreatorCore and other generative AI models to create indistinguishable AI copies

1 of Plaintiffs for the purpose of selling DFY AI influencers depicting Plaintiffs for

2 use by subscribers;

3 k. And in such other ways as may be discovered during the course of this litigation.

4 186. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah further breached

5 their duties owed to Plaintiffs and were thereby negligent as follows:

6 a. By failing to obtain consent from Plaintiffs prior to downloading their images for

7 the personal and commercial uses of Webb, Schultz, Lucas Webb, and John Doe

8 2 - Noah;

9 b. By failing to obtain consent from Plaintiffs prior to using images of Plaintiffs to

10 generate indistinguishable AI copies of Plaintiffs for their personal and

11 commercial uses;

12 c. By failing to obtain consent from Plaintiffs prior to using CreatorCore and other

13 generative AI models to remove the clothing from the indistinguishable AI copies

14 of Plaintiffs, creating nude and NSFW images and videos of Plaintiffs without

15 their consent;

16 d. By failing to obtain consent from Plaintiffs prior to using images and videos of

17 Plaintiffs to generate profit from social media profiles depicting Plaintiffs;

18 e. By failing to obtain consent from Plaintiffs prior to using images and videos of

19 Plaintiffs to generate profit through their advertising for Defendants AI

20 ModelForge and CreatorCore;

21 f. By failing to obtain consent from Plaintiffs prior to using images of Plaintiffs to

22 generate NSFW nude images and videos of Plaintiffs;

23 g. By failing to obtain consent from Plaintiffs prior to using NSFW nude images

24 and videos of Plaintiffs to create and maintain subscription pornographic profiles

25 depicting Plaintiffs for the profit of Defendants Webb, Schultz, Lucas Webb, and

26 John Doe 2 - Noah;

27

h. By failing to obtain consent from Plaintiffs prior to posing as Plaintiffs on subscription pornographic profiles depicting Plaintiffs to engage subscribers to the AI porn sites in conversations;

i. By failing to obtain consent from Plaintiffs prior to selling Plaintiffs' images and videos, including those involving Plaintiffs nude or engaged in sex acts;

j. By failing to obtain consent from Plaintiffs prior to selling DFY AI influencers depicting Plaintiffs for the use of the subscribers to AI ModelForge and CreatorCore;

k. And in such other ways as may be discovered during the course of this litigation.

187. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah knew or reasonably should have known that their actions would result in harm to Plaintiffs.

188. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 – Noah knew they needed consent to use images of women and girls, such as Plaintiffs, to generate AI influencers, and NSFW images and videos of said women and girls.

189. Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah acted with an evil motive or reckless indifference to the harms Plaintiffs would suffer as a result of their conduct.

190. As a direct and proximate result of the negligence of Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah, Plaintiffs have suffered economic losses related to the use and monetization of their images without their consent on social media, in advertising, as the faces of AI Model Forge and CreatorCore, within the AI ModelForge and CreatorCore platforms and chats, for subscription pornography website profiles, and as laid out above.

191. As a direct and proximate result of the negligence of Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah, Plaintiffs have suffered non-economic damages related to the creation, use, sale, and proliferation of their images in both clothed and NSFW forms on the internet by Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah and those who

have received indistinguishable AI copies of Plaintiffs from Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah. These damages are more fully laid out above.

192.   Plaintiffs are seeking all damages they are entitled to recover in this action from Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah.

COUNT II
Negligence
Plaintiffs M.G., H.R., & H.B. v. The ModelForge Defendants

193.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

194.   Defendants Webb and Schultz created and maintained Defendants AI ModelForge and CreatorCore. Defendants Webb and Schultz also created and maintained an agency of AI influencers, including Plaintiffs, which they monetized through use of social media and subscription pornographic websites, such as Fanvue. Defendants Webb and Schultz created and maintained personal social media profiles which were used for the purpose of monetizing Plaintiffs.

195.   Defendants Lucas Webb and John Doe 2 - Noah utilized Defendant CreatorCore's services to generate AI influencers, including Plaintiffs, which he monetized through use of social media and subscription pornographic websites such as Fanvue. Defendants Lucas Webb and John Doe 2 – Noah created and maintained personal social media profiles which were used for the purpose of monetizing Plaintiffs through Defendants Webb, Schultz, AI ModelForge and CreatorCore. Defendants Lucas Webb and John Doe 2 - Noah used images of Plaintiffs to drive traffic through their personal social media profiles to Defendant AI ModelForge and CreatorCore's platforms while earning affiliation marketing payments from Defendants Webb, Schultz, AI ModelForge and CreatorCore. Defendants Lucas Webb and John Doe 2 – Noah are agents of Defendants AI Model Forge and CreatorCore.

196. Defendant AI ModelForge is a subscription service operated by Defendants Webb, Schultz, Lucas Webb, and John Doe 2 - Noah which provides instructions and guidance on how to create and maintain an AI influencer while monetizing the AI influencer.

197. Defendant CreatorCore is a platform operating on a host generative AI model which exists for the purpose of generating AI influencers which are indistinguishable AI copies of unsuspecting women and girls. Defendant CreatorCore facilitates generation of NSFW nude images and videos these AI influencers using strictly clothed images of said unsuspecting women and girls.

198. The ModelForge Defendants used stolen images of Plaintiffs to generate NSFW images and videos of Plaintiffs without their consent.

199. The ModelForge Defendants owed a duty of ordinary care to Plaintiffs.

200. The ModelForge Defendants breached this duty owed to Plaintiffs and were thereby negligent in the following respects:

    a. By providing a "Blueprint" to subscribers directing them on how to select images of women and girls online, such as Plaintiffs, to generate AI influencers from these images; how to create NSFW nude images and videos of these AI influencers; and how to monetize these indistinguishable AI copies of unsuspecting women and girls through social media and subscription pornographic website profiles;

    b. By providing a generative AI platform designed and maintained for removing clothing from unsuspecting women and girls, including Plaintiffs;

    c. By using indistinguishable AI copies of Plaintiffs to advertise for the AI ModelForge and CreatorCore platforms;

    d. By using indistinguishable AI copies of Plaintiffs to demonstrate the capabilities of the AI ModelForge and CreatorCore platforms;

    e. By facilitating and effectuating the creation of nude NSFW images of women and girls, including Plaintiffs;

f. By facilitating and effectuating the creation and sale of DFY AI influencer packages involving Plaintiffs;

g. By insisting on NSFW image and video creation capabilities for Defendant CreatorCore giving masses of predatory men access to software capable of creating nude images and videos of unsuspecting women and girls, such as Plaintiffs;

h. By using social media accounts to drive traffic to Defendants AI ModelForge and CreatorCore by posting sexualized images of Plaintiffs to said social media in advertisements for AI ModelForge and CreatorCore;

i. By providing images and videos of Plaintiffs to subscribers of AI ModelForge and CreatorCore for the subscribers' personal and commercial use of Plaintiffs' likenesses;

j. By using generative AI to create indistinguishable AI copies of Plaintiffs for the purpose of selling their platforms and DFY AI influencers depicting Plaintiffs for use by subscribers;

k. And in such other ways as may be discovered during the course of this litigation.

201. The ModelForge Defendants further breached their duties owed to Plaintiffs and were thereby negligent as follows:

a. By failing to obtain consent from Plaintiffs prior to downloading and using their images;

b. By failing to obtain consent from Plaintiffs prior to using images of Plaintiffs to generate indistinguishable AI copies of Plaintiffs for the ModelForge Defendants' personal and commercial uses;

c. By failing to obtain consent from Plaintiffs prior to using generative AI to remove the clothing from indistinguishable AI copies of Plaintiffs, creating indistinguishable nude and NSFW images and videos of Plaintiffs without their consent;

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d. By failing to obtain consent from Plaintiffs prior to using images and videos of Plaintiffs to generate profit from social media profiles depicting Plaintiffs;

e. By failing to obtain consent from Plaintiffs prior to using images and videos of Plaintiffs to generate profit for the ModelForge Defendants;

f. By failing to obtain consent from Plaintiffs prior to using images of Plaintiffs to generate NSFW nude images and videos of Plaintiffs;

g. By failing to obtain consent from Plaintiffs prior to using NSFW nude images and videos of Plaintiffs to create and maintain subscription pornographic profiles depicting Plaintiffs for the profit of the ModelForge Defendants;

h. By failing to obtain consent from Plaintiffs prior to posing as Plaintiffs on subscription pornographic profiles depicting Plaintiffs to engage subscribers to the AI porn sites in conversations;

i. By failing to obtain consent from Plaintiffs prior to selling Plaintiffs' images and videos, including those involving Plaintiffs nude or engaged in sex acts;

j. By failing to obtain consent from Plaintiffs prior to selling DFY AI influencers depicting Plaintiffs for the use of the subscribers to AI ModelForge and CreatorCore;

k. And in such other ways as may be discovered during the course of this litigation.

202. The ModelForge Defendants knew or reasonably should have known that their actions would result in harm to Plaintiffs.

203. The ModelForge Defendants knew consent was required prior to stealing the images of unsuspecting women and girls from the internet, including Plaintiffs, to generate NSFW images and videos as is indicated in the "Blueprints" and CreatorCore Terms of Service.

204. Despite knowing they needed consent, the ModelForge Defendants made no effort to obtain consent prior stealing images of unsuspecting women and girls from the internet, including Plaintiffs, and did not make any effort to obtain consent from any woman or girl, including Plaintiffs, prior to using said images to generate NSFW images and videos of those

women. This shows directly the ModelForge Defendants' evil motive and reckless indifference towards Plaintiffs.

205. The ModelForge Defendants acted with an evil motive or reckless indifference to the harms Plaintiffs would suffer as a result of their conduct.

206. As a direct and proximate result of the negligence of the ModelForge Defendants Plaintiffs have suffered economic losses related to the use and monetization of their images without their consent on social media, in advertising, as the faces of AI ModelForge and CreatorCore, within the AI ModelForge and CreatorCore platforms and chats, for subscription pornography website profiles, and as laid out above.

207. As a direct and proximate result of the negligence of the ModelForge Defendants Plaintiffs have suffered non-economic damages related to the creation, use, sale, and proliferation of their images in both clothed and NSFW forms on the internet by the ModelForge Defendants and those who have received indistinguishable AI copies of Plaintiffs from the ModelForge Defendants. These damages are more fully laid out above.

208. Plaintiffs are seeking all damages they are entitled to recover in this action from the ModelForge Defendants.

COUNT III
Negligent Design
Plaintiffs M.G., H.R., & H.B. v. Defendants Webb, Schultz, and AI ModelForge

209. Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

210. Defendants Webb and Schultz created and maintained Defendant AI ModelForge.

211. Defendant AI ModelForge is a partnership or unincorporated corporation within the State of Arizona. This partnership or unincorporated corporation is headed by Defendants Webb and Schultz in Arizona.

212. Defendants Webb, Schultz and AI ModelForge created and maintained "Blueprints" outlining Defendants Webb, Schultz and AI ModelForge's steps to misappropriate images of women on the internet into AI influencers for social media profiles and pornographic website profiles.

213. Defendants Webb, Schultz, and AI ModelForge's "Blueprints" are products for the purposes of Arizona's products liability laws.

214. The "Blueprints" are intended by Defendants Webb, Schultz and AI ModelForge to be followed by paid subscribers in creating their own AI influencers from unsuspecting women and girls without their consent.

215. Defendants Webb, Schultz, and AI ModelForge's "Blueprints" were designed and sold by Defendants Webb, Schultz, and AI ModelForge. Defendants Webb, Schultz and AI ModelForge's "Blueprints" were put into the marketplace by Defendants Webb, Schultz and AI ModelForge.

216. Defendants Webb, Schultz, and AI ModelForge owed a duty of ordinary care to Plaintiffs in designing their AI ModelForge "Blueprints."

217. Defendants Webb, Schultz and AI ModelForge breached this duty owed to Plaintiffs and were thereby negligent in the following respects:

    a. By designing the AI ModelForge "Blueprints" with instructions to take images of unsuspecting women and girls from social media for use with generative AI;

    b. By designing the AI ModelForge "Blueprints" with instructions to use images of unsuspecting women and girls to create AI influencers with generative AI;

    c. By designing the AI ModelForge "Blueprints" with instructions with instructions on how to generate NSFW and nude images and videos of unsuspecting women and girls using generative AI;

    d. By designing the AI ModelForge "Blueprints" with instructions for monetization of unsuspecting women and girls by using indistinguishable AI clones of the women and girls on social media;

e. By designing the AI ModelForge "Blueprints" with instructions for setting up paid subscription pornographic website profiles for unsuspecting women and girls using indistinguishable AI clones of said women and girls; and

f. In such other ways as may be discovered during the course of litigating this action.

218. Defendants Webb, Schultz, and AI ModelForge knew or reasonably should have known that their actions would result in harm to Plaintiffs.

219. Defendants Webb, Schultz, and AI ModelForge acted with an evil motive or reckless indifference to the harms Plaintiffs would suffer as a result of their conduct.

220. As a direct and proximate result of the negligent design of the AI ModelForge "Blueprints," Plaintiffs have suffered economic losses related to the use and monetization of their images without their consent on social media, in advertising, within the AI ModelForge and CreatorCore platforms and chats, for subscription pornography website profiles, and as laid out above.

221. As a direct and proximate result of the negligence of the AI ModelForge "Blueprints" Plaintiffs have suffered non-economic damages related to the creation, use, sale, and proliferation of their images in both clothed and NSFW forms on the internet by the Defendants and those who have used the AI ModelForge "Blueprints." These damages are more fully laid out above.

222. Plaintiffs are seeking all damages they are entitled to recover in this action from Defendants Webb, Schultz, and AI ModelForge.

COUNT IV
Negligent Design
Plaintiffs M.G., H.R., & H.B. v. Defendants
Webb, Schultz, John Doe 3 – Isaac, and CreatorCore

223. Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

224. Defendants Webb, Schultz, and John Doe 3 - Isaac created and maintained Defendant CreatorCore.

225. Defendant CreatorCore is a generative AI platform operating on a host generative AI model provided by Defendant FAL AI. Defendant CreatorCore is a platform built for the purpose of misappropriating images of unsuspecting women and girls without their consent and turning them into indistinguishable AI copies to be used as AI influencers.

226. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore specifically designed the CreatorCore platform to create generative AI indistinguishable copies of women and girls.

227. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore specifically designed the CreatorCore platform to possess the capability of removing clothing from women and girls with only clothed images of the unsuspecting women and girls being inputted into CreatorCore.

228. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore specifically designed the CreatorCore platform to generate nude and NSFW images of unsuspecting women and girls without their consent. This includes generations of nude and NSFW images and videos, pornographic content, and fetish content of unsuspecting women and girls without their consent.

229. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore owed a duty of ordinary care to Plaintiffs in the design of their CreatorCore generative AI platform.

230. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore breached this duty of ordinary care to Plaintiffs in the following respects:

    a. By designing CreatorCore to generate indistinguishable copies of unsuspecting women and girls, including Plaintiffs, without any guardrails protecting the owners of the inputted images of unsuspecting women and girls;

b. By designing CreatorCore to generate indistinguishable copies of unsuspecting women and girls without any protections for the identity of the unsuspecting women and girls being used in the inputted images;

c. By designing CreatorCore to generate indistinguishable AI copies of unsuspecting women and girls which can then be used in any capacity;

d. By designing CreatorCore to generate NSFW and nude images and videos of unsuspecting women and girls;

e. By designing CreatorCore with face-swapping technology, allowing subscribers to put unsuspecting women and girls into images and videos in which they were not involved, including pornography;

f. By failing to design CreatorCore with guardrails to ensure consent of unsuspecting women and girls, including Plaintiffs, whose images are being used to create AI influencers and NSFW images and videos;

g. By designing CreatorCore with the capability of misappropriating a woman or girl's image with unlimited capabilities as to how that woman or girl's image may be used after it is misappropriated; and

h. Such other and further ways as may be discovered during the litigation process.

231. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore knew or reasonably should have known that their actions would result in harm to Plaintiffs.

232. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore acted with an evil motive or reckless indifference to the harms Plaintiffs would suffer as a result of their conduct. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore acted with evil motive in designing CreatorCore with the ability to misappropriate images of unsuspecting women and girls to be used in NSFW and pornographic content. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore knew their actions were wrong and their motivation was evil as they were repeatedly told to cease NSFW generations of unsuspecting women and girls and refused solely in the name of profit.

233.   Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore knew the consent of women and girls, including Plaintiffs, was necessary to use their images to generate AI influencers and NSFW images and videos of said women and girls. This is indicated directly within CreatorCore's Terms of Service. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore not only ignored this requirement of consent, but openly flaunted it, celebrating taking images of unsuspecting women and girls from the internet to generate AI influencers and NSFW images and videos of said women and girls.

234.   As a direct and proximate result of the negligent design CreatorCore, Plaintiffs have suffered economic losses related to the use and monetization of their images without their consent on social media, in advertising, within the AI ModelForge and CreatorCore platforms and chats, for subscription pornography website profiles, and as laid out above.

235.   As a direct and proximate result of the negligence of the Defendants Webb, Schultz, and CreatorCore Plaintiffs have suffered non-economic damages related to the creation, use, sale, and proliferation of their images in both clothed and NSFW forms on the internet by the Defendants and those who have used CreatorCore. These damages are more fully laid out above.

236.   Plaintiffs are seeking all damages they are entitled to recover in this action from Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore.

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COUNT V
Strict Liability
Plaintiffs M.G., H.R., & H.B. v. Defendants Webb, Schultz, and AI ModelForge

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237.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

238.   Defendants Webb and Schultz created and maintained Defendant AI ModelForge.

239.   Defendant AI ModelForge is a partnership or unincorporated corporation within the State of Arizona. This partnership or unincorporated corporation is headed by Defendants Webb and Schultz in Arizona.

240.   Defendants Webb, Schultz and AI ModelForge created and maintained "Blueprints" outlining Defendants Webb, Schultz and AI ModelForge's steps to misappropriate images of women on the internet into AI influencers for social media profiles and pornographic website profiles.

241.   Defendants Webb, Schultz, and AI ModelForge's "Blueprints" are products for the purposes of Arizona's products liability laws.

242.   The AI ModelForge "Blueprints" encourage users to steal images from unsuspecting women and girls without their consent for use with generative AI to create AI influencers and NSFW images and videos depicting said women and girls.

243.   The AI ModelForge "Blueprints" make no mention of obtaining consent from the women and girls from whom the subscribers are instructed to steal images for use in creating AI influencers and NSFW images and videos depicting said women and girls.

244.   Defendants Webb, Schultz, and AI ModelForge designed and sold the AI ModelForge "Blueprints" in the course and scope of their business. The AI ModelForge "Blueprints" entered the marketplace as a result of the actions of Defendants Webb, Schultz and AI ModelForge.

245.   The "Blueprints" are intended by Defendants Webb, Schultz and AI ModelForge to be followed by paid subscribers in creating their own AI influencers from unsuspecting women and girls without their consent.

246.   Defendants Webb, Schultz, and AI ModelForge's "Blueprints" were designed and sold by Defendants Webb, Schultz, and AI ModelForge. Defendants Webb, Schultz and AI ModelForge's "Blueprints" were put into the marketplace by Defendants Webb, Schultz and AI ModelForge.

247. Following the steps within the AI ModelForge "Blueprints" to generate an AI influencer, including nude NSFW images and videos of said AI influencer, is a reasonably anticipated use of the AI ModelForge "Blueprints."

248. Using Defendants Webb, Schultz, and AI ModelForge's instructions within the "Blueprints" to create social media profiles and NSFW pornographic website profiles for unsuspecting women and girls is a reasonably anticipated use of the "Blueprints."

249. The AI ModelForge "Blueprints" were used in a reasonably anticipated manner when they were used to instruct AI ModelForge subscribers to generate AI influencers, along with nude and NSFW images and videos without their consent. Further, the AI ModelForge "Blueprints" were used in a reasonably foreseeable manner when its instructions were followed by subscribers stealing images from unsuspecting women and girls to create social media accounts and profiles on paid subscription pornographic websites depicting said women and girls for profit.

250. The AI ModelForge "Blueprints" were unreasonably dangerous when put to a reasonably anticipated use as it laid out the steps to harm unsuspecting women and girls, such as Plaintiffs, by using their likenesses to create indistinguishable AI copies of the women and girls for personal use, social media accounts, and profiles on paid subscription pornographic websites without their consent. Great financial gain was promised to subscribers to the AI ModelForge "Blueprints" if they used it in a reasonably anticipated manner and followed the instructions therein.

251. Plaintiffs suffered harm as a result of AI ModelForge subscribers using the AI ModelForge "Blueprints" to generate indistinguishable AI copies of Plaintiffs including the generation of nude NSFW images and videos. These harms suffered by Plaintiffs were reasonably foreseeable.

252. Defendants Webb, Schultz, and AI ModelForge knew or reasonably should have known that their actions would result in harm to unsuspecting women and girls such as Plaintiffs.

253. Defendants Webb, Schultz, and AI ModelForge acted with an evil motive or reckless indifference to the harms unsuspecting women and girls, such as Plaintiffs, would suffer as a result of creating "Blueprints" providing instructions to steal the likenesses of unsuspecting women and girls to generate pornographic images of said women and girls which were indistinguishable from those women and girls.

254. Defendants Webb, Schultz, and AI ModelForge knew they needed consent from women and girls, including Plaintiffs, prior to using their images to generate AI influencers and NSFW images and videos of said women and girls. Defendants Webb, Schultz, and AI ModelForge specifically omitted any reference to obtaining consent from their "Blueprints."

255. As a direct and proximate result of the unreasonably dangerous and defective condition of the AI ModelForge "Blueprints," Plaintiffs have suffered economic losses related to the use and monetization of their images without their consent on social media, in advertising, as the faces of AI ModelForge and CreatorCore, within the AI ModelForge and CreatorCore platforms and chats, for subscription pornography website profiles, and as laid out above.

256. As a direct and proximate result of the unreasonably dangerous and defective condition of the AI ModelForge "Blueprints," Plaintiffs have suffered non-economic damages related to the creation, use, sale, and proliferation of their images in both clothed and NSFW forms on the internet by the Defendants and those who have used the AI ModelForge "Blueprints." These damages are more fully laid out above.

257. Plaintiffs are seeking all damages they are entitled to recover in this action from Defendants Webb, Schultz, and AI ModelForge.

COUNT VI
Strict Liability
Plaintiffs M.G., H.R., & H.B. v. Defendants
Webb, Schultz, John Doe 3 – Isaac, and CreatorCore

258. Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

259. Defendants Webb, Schultz, John Doe 3 – Isaac, created and maintained CreatorCore.

260. Defendant CreatorCore is a generative AI platform operating on host generative AI models provided by Defendant FAL. Defendant CreatorCore is a platform built for the purpose of misappropriating images of unsuspecting women and girls without their consent and turning them into indistinguishable AI copies to be used as AI influencers.

261. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore's CreatorCore generative AI platform is a product for the purposes of Arizona's products liability laws.

262. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore designed and sold the CreatorCore generative AI platform in the course and scope of their business. CreatorCore entered the marketplace as a result of the actions of Defendants Webb, Schultz John Doe 3 – Isaac, and CreatorCore.

263. CreatorCore is intended by Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore to be used by paid subscribers in creating their own AI influencers from unsuspecting women and girls, including Plaintiffs, without their consent, including undressing the unsuspecting girls and women for the purposes of making nude, NSFW, pornographic, and fetish images and videos.

264. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore specifically designed the CreatorCore platform to create indistinguishable copies of women and girls using generative AI.

265. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore specifically designed the CreatorCore platform to possess the capability of removing clothing from women and girls with only clothed images of the unsuspecting women and girls being inputted into CreatorCore.

266. Defendants Webb, Schultz, and CreatorCore specifically designed the CreatorCore platform to generate nude and NSFW images of unsuspecting women and girls

without their consent. This includes generations of nude images and videos, pornographic content, and fetish content of unsuspecting women and girls without their consent.

267. Using CreatorCore to input images of unsuspecting women and girls, including Plaintiffs, to generate AI influencers is a reasonably anticipated use of CreatorCore.

268. Using CreatorCore to generate indistinguishable AI copies of unsuspecting women and girls, including Plaintiffs, from their owned images is a reasonably foreseeable use of CreatorCore.

269. Using CreatorCore to create nude, NSFW, and pornographic images and videos of unsuspecting women and girls, such as Plaintiffs, is a reasonably anticipated use of CreatorCore.

270. CreatorCore was used in a reasonably foreseeable manner when it was used to generate AI influencers depicting Plaintiffs from Plaintiffs' images.

271. CreatorCore was used in a reasonably foreseeable manner when it was used to generate nude, NSFW, pornographic, and fetish images and videos of unsuspecting women and girls, such as Plaintiffs.

272. CreatorCore was unreasonably dangerous when put to a reasonably anticipated use as it allowed users to create indistinguishable AI copies of unsuspecting women and girls, such as Plaintiffs. Once a CreatorCore user creates an indistinguishable AI copy of an unsuspecting woman or girl, CreatorCore's generative AI can be used to undress the indistinguishable AI copy of a woman or girl, such as Plaintiffs. Once a CreatorCore user has a nude image of their AI influencer, this AI influencer, such as Plaintiffs, can be depicted in a wide range of sexually explicit images and videos.

273. CreatorCore was unreasonably dangerous when put to a reasonably anticipated use as it allowed its users to create nude, NSFW, pornographic, and fetish images and videos of unsuspecting women and girls, such as Plaintiffs, which were indistinguishable from actual photos and videos of said unsuspecting women and girls without their consent.

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274. The harms suffered by Plaintiffs were reasonably foreseeable based upon the defective design of CreatorCore.

275. Plaintiffs suffered harm as a result of men and boys using CreatorCore to generate indistinguishable AI copies of Plaintiffs including the generation of nude, NSFW, pornographic, and/or fetish images and videos of Plaintiffs.

276. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore knew or reasonably should have known that their actions would result in harm to unsuspecting women and girls such as Plaintiffs.

277. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore knew they needed consent from women and girls, including Plaintiffs, prior to using their images to generate AI influencers and NSFW images and videos of said women and girls. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore went as far as to list in CreatorCore's Terms of Service that one must obtain consent prior to using images of women and girls in CreatorCore, but they never instructed their users in their "Blueprints" and provided subscribers guidance on how to avoid detection by the women and girls from whom images were stolen without their consent.

278. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore acted with an evil motive or reckless indifference to the harms unsuspecting women and girls, such as Plaintiffs, would suffer as a result of CreatorCore's unreasonably dangerous and defective condition.

279. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore expressed on numerous occasions they knew what they were doing was illegal, immoral, unethical, and wrong, but did not change CreatorCore.

280. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore were told by over ten payment processing companies that they would not process payments for CreatorCore due to the immoral and depraved nature of CreatorCore.

281. As a direct and proximate result of the unreasonably dangerous and defective condition of CreatorCore, Plaintiffs have suffered economic losses related to the use and monetization of their images without their consent on social media, in advertising, as the faces of AI ModelForge and CreatorCore, within the AI ModelForge and CreatorCore platforms and chats, for subscription pornography website profiles, and as laid out above.

282. As a direct and proximate result of the unreasonably dangerous and defective condition of CreatorCore, Plaintiffs have suffered non-economic damages related to the creation, use, sale, and proliferation of their images in both clothed and NSFW forms on the internet by the Defendants and those who have used CreatorCore. These damages include the loss of their bodily autonomy as a result of the unreasonably dangerous and defective condition of CreatorCore. These damages are more fully laid out above.

283. Plaintiffs are seeking all damages they are entitled to recover in this action from Defendants Webb, Schultz, John Doe 3 – Isaac, and AI ModelForge.

COUNT VII
Negligence
Plaintiffs M.G., H.R., & H.B. v. Defendant FAL

284. Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

285. Defendant FAL operates several generative AI models which are optimized for use by software/web developers to integrate generative AI models into their websites/software.

286. Defendant FAL's generative AI models are products for the purposes of Arizona's products liability laws.

287. Defendant FAL designed and sold generative AI models for website building and optimization in the course and scope of their business. Defendant FAL's generative AI models entered the marketplace as a result of the actions of Defendant FAL. Defendant FAL's generative AI models were sold by Defendant FAL to the ModelForge Defendants for use with CreatorCore.

288. Defendant FAL's generative AI models are intended by Defendant FAL to be used by web developers in creating their own AI platforms operating off their host AI models as was done by CreatorCore. When an image or video is generated on CreatorCore, including, but not limited to, NSFW, nude, and pornographic images and videos of unsuspecting women and girls, they are hosted on an FAL URL v3b.fal.media indicating that an FAL AI model is being used for the generation of the images and videos of unsuspecting women and girls.

289. Defendant FAL specifically hosts generative AI models without guardrails to protect against the generation of NSFW, nude, and pornographic images and videos of unsuspecting women and girls. These generative AI models without guardrails for the generation of NSFW, nude, or pornographic content are then optimized for web and software developers to integrate into their generative AI platforms by FAL.

290. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore designed the CreatorCore platform to possess the capability of removing clothing from women and girls with only clothed images of the unsuspecting women and girls being inputted into CreatorCore. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore specifically selected Defendant FAL's generative AI models to build the CreatorCore platform on due to their lack of guardrails for NSFW generation.

291. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore designed the CreatorCore platform to generate nude and NSFW images of unsuspecting women and girls without their consent. This includes generations of nude and NSFW images and videos, pornographic content, and fetish content of unsuspecting women and girls without their consent, including Plaintiffs. When deciding what generative AI model should be used to host CreatorCore's platform for its stated purposes, Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore specifically selected Defendant FAL's generative AI models as they possessed the necessary NSFW generative AI functionality.

292. Defendant FAL owed a duty of ordinary care to Plaintiffs in the design of their FAL generative AI models.

293. Defendant FAL breached this duty of ordinary care to Plaintiffs in the following respects:

    a. By failing to add and maintain safeguards against the generation of NSFW and nude images and videos of unsuspecting women and girls within its generative AI models;

    b. By failing to add safeguards against the generation of AI influencers from unsuspecting women and girls without their consent;

    c. By failing to add safeguards to ensure images of women and girls inputted into their generative AI models are owned or authorized to be used by those inputting the images;

    d. By failing to monitor the use of its generative AI models to ensure the generative AI models are not being used to generate NSFW images and videos of unsuspecting women and girls;

    e. By failing to abide by policies and procedures in place to ensure images of unsuspecting women and girls are not used within their generative AI models to generate NSFW images and videos of unsuspecting women and girls;

    f. By failing to have in place sufficient policies and procedures to ensure images of unsuspecting women and girls are not used within their generative AI models to generate NSFW images and videos of unsuspecting women and girls;

    g. By failing to abide by industry standards for generative AI models ensuring images of unsuspecting women and girls are not used to generate NSFW images and videos of said women and girls;

    h. By designing generative AI models capable of generating and hosting NSFW images and videos of unsuspecting women and girls;

    i. By hosting generative AI models and making them available for use by others capable of generating and hosting NSFW images and videos of unsuspecting women and girls;

j. By failing to monitor generative AI outputs hosted on FAL URL's to ensure their generative AI models were not being used to create NSFW images and videos of unsuspecting women and girls;

k. By facilitating the use of generative AI models with the capability of generating NSFW and nude images and videos of unsuspecting women and girls by individuals and companies designing, operating, and maintaining generative AI platforms; and

l. Such other and further ways as may be discovered during the litigation process.

294. Defendant FAL knew or reasonably should have known that its actions would result in harm to Plaintiffs and similarly situated unsuspecting women and girls.

295. Defendant FAL acted with an evil motive or reckless indifference to the harms Plaintiffs and other unsuspecting women and girls would suffer as a result of its conduct. Defendant FAL acted with evil motive in operating and maintaining generative AI models with the ability to misappropriate images of unsuspecting women and girls to be used in NSFW and pornographic content.

296. Defendant FAL knew its generative AI models could be used to generate NSFW images and videos of unsuspecting women and girls, such as Plaintiffs, but chose to do nothing about it. This is indicated within Defendant FAL's Terms of Service which list as prohibited conduct "you will not use the Services to generate, distribute, or facilitate sexually explicit content."

297. Despite having this policy within its Terms of Service, Defendant FAL provided generative AI models which were capable of generating, distributing, or facilitating sexually explicit content. Defendant FAL did absolutely nothing to make its generative AI models incapable of generating, distributing, or facilitating sexually explicit content, did nothing to monitor its generative AI models to ensure they were not being used to generate, distribute, or facilitate sexually explicit content, and did nothing to ensure Defendant FAL was not hosting sexually explicit content generated, distributed, or facilitated by its generative AI models.

298.   As a direct and proximate result of the negligence of Defendant FAL, Plaintiffs have suffered economic losses related to the use and monetization of their images without their consent on social media, in advertising, as the faces of AI ModelForge and CreatorCore, within the AI ModelForge and CreatorCore platforms and chats, for subscription pornography website profiles, and as laid out further above.

299.   As a direct and proximate result of the negligence of Defendant FAL Plaintiffs have suffered non-economic damages related to the creation, use, sale, and proliferation of their images in both clothed and NSFW forms on the internet by the Defendants and those who have used FAL's generative AI models. These damages are more fully laid out above.

300.   Plaintiffs are seeking all damages they are entitled to recover in this action from Defendant FAL.

COUNT VIII
Strict Liability
Plaintiffs M.G., H.R., & H.B. v. Defendant FAL

301.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

302.   Defendant FAL operates several generative AI models which are optimized for use by software/web developers to integrate AI into their websites/software.

303.   Defendant FAL's generative AI models are products for the purposes of Arizona's products liability laws.

304.   Defendant FAL designed and sold generative AI models for website building and optimization in the course and scope of their business. Defendant FAL's generative AI models entered the marketplace as a result of the actions of Defendant FAL. Defendant FAL's generative AI models were sold by Defendant FAL to the ModelForge Defendants for use with CreatorCore.

305.   Defendant FAL's generative AI models are intended by Defendant FAL to be used by web developers in creating their own AI platforms operating off the host generative AI models as was done by CreatorCore. When an image or video is generated on CreatorCore, including, but not limited to, NSFW, nude, and pornographic images and videos of unsuspecting women and girls, they are hosted on an FAL URL, v3b.fal.media, indicating that an FAL generative AI model is being used for the generation of the images and videos of unsuspecting women and girls.

306.   Defendant FAL designs and sells generative AI models without guardrails to protect against the generation of NSFW, nude, and pornographic images and videos of unsuspecting women and girls. These generative AI models without guardrails for the generation of NSFW, nude, or pornographic content are then optimized for web and software developers to integrate into their generative AI platforms.

307.   Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore designed the CreatorCore platform to possess the capability of removing clothing from women and girls with only clothed images of the unsuspecting women and girls being inputted into CreatorCore. Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore specifically selected Defendant FAL's generative AI models to build the CreatorCore platform on due to its lack of guardrails for NSFW generation.

308.   Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore designed the CreatorCore platform to generate nude and NSFW images of unsuspecting women and girls without their consent. This includes generations of nude and NSFW images and videos, pornographic content, and fetish content of unsuspecting women and girls without their consent, including Plaintiffs. When deciding what generative AI model should be used to host CreatorCore's platform for its stated purposes, Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore specifically selected Defendant FAL's generative AI models.

309.   Using Defendant FAL's generative AI models to host an AI platform with the capability to generate NSFW, nude, and pornographic images and videos of unsuspecting women is a reasonably anticipated use of Defendant FAL's generative AI models.

310.   Using Defendant FAL's generative AI models to generate indistinguishable AI copies of unsuspecting women and girls, including Plaintiffs, from their owned images is a reasonably foreseeable use of Defendant FAL's generative AI models.

311.   Using Defendant FAL's generative AI models to create nude, NSFW, and pornographic images and videos of unsuspecting women and girls, such as Plaintiffs, is a reasonably anticipated use of Defendant FAL's generative AI models.

312.   Defendant FAL accepted payments from Defendants Webb, Schultz, John Doe 3 – Isaac, and CreatorCore for every AI influencer generated through CreatorCore and every image/video generated through CreatorCore, including NSFW images and videos. Defendant CreatorCore generates 1000 influencers every week and 500,000 images and videos a month on Defendant FAL's generative AI models.

313.   Defendant FAL's generative AI models were used in a reasonably foreseeable manner when they were used to operate as the host for a generative AI platform, CreatorCore, with NSFW generative capabilities.

314.   Defendant FAL's generative AI models were used in a reasonably foreseeable manner when they were used to generate AI influencers, which are indistinguishable AI copies of unsuspecting women and girls, such as Plaintiffs.

315.   Defendant FAL's generative AI models were used in a reasonably foreseeable manner when they were used to generate nude, NSFW, pornographic, and fetish images and videos of unsuspecting women and girls, such as Plaintiffs.

316.   Defendant FAL's generative AI models were unreasonably dangerous when put to a reasonably anticipated use of creating indistinguishable AI copies of unsuspecting women and girls, such as Plaintiffs, which can then be used with Defendant FAL's generative AI models to depict the indistinguishable AI copy of a woman or girl doing anything.

317.   Defendant FAL's generative AI models were unreasonably dangerous when put to a reasonably anticipated use of creating nude, NSFW, pornographic, and fetish images and videos of unsuspecting women and girls, such as Plaintiffs.

318.   Defendant FAL's generative AI models were unreasonably dangerous when put to a reasonably anticipated use when they were used to generate NSFW images and videos of unsuspecting women and girls which were indistinguishable from actual photos and videos of said unsuspecting women and girls.

319.   Defendant FAL's generative AI models were unreasonably dangerous when put to a reasonably anticipated use as they lacked guardrails to protect against the creation of nude, NSFW, pornographic, and fetish images and videos of unsuspecting women and girls, such as Plaintiffs, which were indistinguishable from actual photos and videos of said unsuspecting women and girls without consent.

320.   Plaintiffs suffered harm as a result of men and boys using Defendant FAL's generative AI models to generate indistinguishable AI copies of Plaintiffs including the generation of nude, NSFW, pornographic, and/or fetish images and videos. The harm suffered by Plaintiffs was reasonably foreseeable.

321.   Defendant FAL knew or reasonably should have known that their generative AI models would result in harm to unsuspecting women and girls such as Plaintiffs.

322.   Defendant FAL acted with an evil motive or reckless indifference to the harms unsuspecting women and girls, such as Plaintiffs, would suffer as a result of Defendant FAL's unreasonably dangerous and defective generative AI models.

323.   Defendant FAL knew its generative AI models could be used to generate NSFW images and videos of unsuspecting women and girls, such as Plaintiffs, but chose to do nothing about it. This is indicated within Defendant FAL's Terms of Service which list as prohibited conduct "you will not use the Services to generate, distribute, or facilitate sexually explicit content."

324. Despite having this policy within its Terms of Service, Defendant FAL provided generative AI models which were capable of generating, distributing, or facilitating sexually explicit content. Defendant FAL did absolutely nothing to make its generative AI models incapable of generating, distributing, or facilitating sexually explicit content, did nothing to monitor its generative AI models to ensure they were not being used to generate, distribute, or facilitate sexually explicit content, and did nothing to ensure Defendant FAL was not hosting sexually explicit content generated, distributed, or facilitated by its generative AI models.

325. Other generative AI models outside of FAL have specific guardrails in place to prevent the generation of NSFW, nude, and pornographic images and videos of unsuspecting women and girls.

326. As a direct and proximate result of the unreasonably dangerous and defective condition of Defendant FAL's generative AI models, Plaintiffs have suffered economic losses related to the use and monetization of their images without their consent on social media, in advertising, within the AI ModelForge and CreatorCore platforms and chats, for subscription pornography website profiles, and as laid out above.

327. As a direct and proximate result of the unreasonably dangerous and defective condition of Defendant FAL's generative AI models, Plaintiffs have suffered non-economic damages related to the creation, use, sale, and proliferation of their images in both clothed and NSFW forms on the internet by the Defendants and those who have used Defendant FAL's generative AI models. These damages include the loss of their bodily autonomy as a result of the unreasonably dangerous and defective condition of Defendant FAL's generative AI models. These damages are more fully laid out above.

328. Plaintiffs are seeking all damages they are entitled to recover in this action from Defendant FAL.

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COUNT IX
Negligence
Plaintiffs M.G., H.R., & H.B. v. Defendant Phyziro

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329. Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

330. Defendant Phyziro owned and operated Phyziro, a payment processing coordinator for online payments.

331. The ModelForge Defendants built AI ModelForge and CreatorCore using Stripe for online payment processing. After reaching a certain threshold of online payments using Stripe for CreatorCore, Stripe looked into the ModelForge Defendants' businesses. Stripe ultimately rejected the ModelForge Defendants' business due to CreatorCore's capability to generate NSFW images and videos of unsuspecting women and girls.

332. The ModelForge Defendants had $150,000.00 in Stripe when their business was rejected by Stripe. The ModelForge Defendants had the option to eliminate NSFW and nude image generation of unsuspecting women and girls within CreatorCore, and they could continue processing payments with Stripe and keep the $150,000.00 held by Stripe.

333. Rather than eliminate NSFW image and video generation of unsuspecting women and girls, and keeping Stripe's payment processing and the $150,000.00; the ModelForge Defendants refused to eliminate NSFW generations and embarked on a search for a new payment processor for CreatorCore.

334. The ModelForge Defendants were rejected by over ten payment processors for CreatorCore specifically due to the ModelForge Defendants' refusal to remove CreatorCore's capability of generating NSFW images and videos of unsuspecting women and girls.

335.   The ModelForge Defendants found Defendant Phyziro. Defendant Phyziro knew about CreatorCore's capability to generate NSFW images and videos of unsuspecting women and girls.

336.   Despite Defendant Phyziro's knowledge of CreatorCore's capability to generate NSFW images and videos of unsuspecting women and girls, and the ModelForge Defendants' being rejected by over ten payment processors for the same, Defendant Phyziro agreed to process payments for the ModelForge Defendants' CreatorCore.

337.   While the ModelForge Defendants searched for a payment processor after Stripe rejected their business, and while over ten different payment processors refused their business, the ModelForge Defendants' CreatorCore platform was shut down and no NSFW images or videos of unsuspecting women and girls were generated using CreatorCore.

338.   The ModelForge Defendants' business, specifically CreatorCore, was inoperable without a payment processor.

339.   Because Defendant Phyziro agreed to process payments for the ModelForge Defendants, specifically CreatorCore, NSFW image and video generation on CreatorCore continued, and increased to a pace of 500,000 images and videos of unsuspecting women and girls every 30 days and 1000 AI influencers generated a week.

340.   Defendant Phyziro owed a duty of ordinary care to Plaintiffs.

        a. Defendant Phyziro breached this duty owed to Plaintiffs and was thereby negligent in the following respects:

        b. By agreeing to process payments for CreatorCore knowing CreatorCore was being used to misappropriate images of unsuspecting women and girls;

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c. By agreeing to process payments for CreatorCore knowing CreatorCore was being used to generate NSFW images and videos of unsuspecting women and girls;

d. By agreeing to process payments for CreatorCore knowing they had been rejected by over ten payment processors due to the NSFW generative AI capabilities of CreatorCore;

e. By facilitating and effectuating the business of the ModelForge Defendants that was shut down without a payment processor; and

f. And in such other ways as may be discovered during the course of this litigation.

341. Defendant Phyziro further breached their duties owed to Plaintiffs and was thereby negligent as follows:

a. By failing to investigate the business of the ModelForge Defendants;

b. By failing to investigate CreatorCore;

c. By failing to have standards or policies in place to ensure they don't process payments for individuals or businesses using generative AI to create NSFW images and videos of unsuspecting women and girls;

d. By failing to follow their internal policies and procedures to ensure they don't process payments for individuals or businesses using generative AI to create NSFW images and videos of unsuspecting women and girls; and

e. And in such other ways as may be discovered during the course of this litigation.

342. Defendant Phyziro knew or reasonably should have known that their actions would result in harm to Plaintiffs and similarly situated unsuspecting women and girls.

343.   Defendant Phyziro acted with an evil motive or reckless indifference to the harms Plaintiffs and other unsuspecting women and girls would suffer as a result of their conduct.

344.   As a direct and proximate result of the negligence of Defendant Phyziro Plaintiffs have suffered economic losses related to the use and monetization of their images without their consent on social media, in advertising, as the faces of AI ModelForge and CreatorCore, within the AI ModelForge and CreatorCore platforms and chats, for subscription pornography website profiles, and as laid out above.

345.   As a direct and proximate result of the negligence of Defendant Phyziro Plaintiffs have suffered non-economic damages related to the creation, use, sale, and proliferation of their images in both clothed and NSFW forms on the internet by Defendants and those using Defendants' CreatorCore platform. These damages are more fully laid out above.

346.   Plaintiffs are seeking all damages they are entitled to recover in this action from Defendant Phyziro.

COUNT X
Negligence Per Se in Violation of A.R.S. §13-1245
Plaintiffs M.G., H.R., & H.B. v. Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50

347.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

348.   *A.R.S. §13-1425* is entitled "Unlawful Disclosure of Images Depicting States of Nudity or Specific Sexual Activities; Classification; Definitions."

349.   This statue states "It is unlawful for a person to intentionally disclose an image of another person who is identifiable from the image itself or from information displayed in connection with the image if all of the following apply: (1) The person in the image is depicted

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in a state of nudity or is engaged in specific sexual activities; (2) The depicted person has a reasonable expectation of privacy…; (3) The image is disclosed with the intent to harm, harass, intimidate, threaten, or coerce the depicted person."

350.　　　　Within *A.R.S. §13-1425*, "'Disclose' means display, distribute, publish, advertise, or offer." " 'Harm' means physical injury, financial injury, or serious emotional distress." " 'Realistic pictorial representation' means an image that is created or modified to reasonably appear to be an actual image of an identifiable person depicted in a state of nudity or engaged in specific sexual activities that did not actually occur." " 'Reasonable expectation of privacy' means the person exhibits an actual expectation of privacy and the expectation is reasonable."

351.　　　　Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have disclosed images of Plaintiffs that are readily identifiable as Plaintiffs in various states of nudity and engaged in specific sexual activities.

352.　　　　Plaintiffs had a reasonable expectation of privacy over their images as they have neither published nude images of themselves, nor provided to Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 any images of themselves in any nude state.

353.　　　　The NSFW and nude images and videos disclosed by Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 were realistic pictorial representations of Plaintiffs as defined within the statute.

354.　　　　Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 disclosed the images of Plaintiffs to cause them harm as defined within the statute. Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 knew disclosing realistic pictorial and video representations of Plaintiffs in NSFW and nude states would cause emotional harm and financial injury to Plaintiffs.

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355.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 took steps to conceal their identities as the creators of NSFW and nude realistic pictorial and video representations of Plaintiffs.

356.   *A.R.S. §13-1245* was enacted and intended to protect individuals from unauthorized disclosure of nude and NSFW images of unsuspecting women and girls, such as Plaintiffs.

357.   At the time of the negligence per se, above, Plaintiffs were amongst the class of citizens *A.R.S. §13-1245* was enacted to protect.

358.   As a direct and proximate result of the above negligence per se of Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50, Plaintiffs have sustained damages and will continue to suffer damages.

359.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have caused and will continue to cause irreparable harm to Plaintiffs' reputations.

360.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions have caused Plaintiffs to suffer general damages including, but not limited to, harm to Plaintiffs' reputations and emotional and mental distress.

361.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's negligence per se have caused Plaintiffs to suffer financial losses which Plaintiffs are entitled to recover from Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 in the amount of the fair market value of each direct or indirect use of their likenesses.

362.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have profited directly or indirectly through the unlawful use of Plaintiffs' likenesses, including NSFW and nude images and videos, entitling Plaintiffs to recover the entirety of the revenue Defendants Webb, Schultz, Lucas Webb, John Doe 1 –

Lynch, John Doe 2 – Noah, and John Does 6-50 have generated, directly or indirectly, from the unlawful use of their likenesses.

363.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 acted with malice and evil motive in generating and disclosing NSFW and nude images of Plaintiffs entitling Plaintiffs to an award of punitive damages.

COUNT XI
Right of Publicity
PLAINTIFFS v. DEFENDANTS WEBB, SCHULTZ, LUCAS WEBB, AI MODELFORGE, CREATORCORE, JOHN DOE 1 – LYNCH, JOHN DOE 2 – NOAH, AND JOHN DOES 6-50

364.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

365.   The common law right of publicity is recognized in Arizona.

366.   Pursuant to Plaintiffs' rights of publicity, Plaintiffs possess the exclusive right to the ownership and control of their name image and likeness for commercial purposes.

367.   At no time did Plaintiffs consent to Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 to use their images or likenesses for any purpose, commercial or otherwise.

368.   As set forth in great detail in the preceding paragraphs of Plaintiffs' Petition, Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 intentionally obtained Plaintiffs' images and likenesses without Plaintiffs' knowledge or consent.

369.   As set forth in great detail in the preceding paragraphs of Plaintiffs' Petition, Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 intentionally used Plaintiffs' images and likenesses for commercial purposes for Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's financial benefit.

370.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have never compensated Plaintiffs for the unauthorized use of their likenesses and images.

371.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have caused and will continue to cause irreparable harm to Plaintiffs' reputation.

372.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions have caused Plaintiffs to suffer general damages including but not limited to harm to Plaintiffs' reputation and continued and ongoing mental and emotional damages.

373.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions have caused Plaintiffs to suffer monetary losses which they are entitled to recover from the Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 in the amount of the fair market value of each direct or indirect use of their likenesses.

374.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have profited directly or indirectly through the unlawful use of Plaintiffs' likenesses and images, entitling Plaintiffs to recover the entirety of the revenue Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50, and their businesses, have generated, directly or indirectly from the unlawful use of their likenesses and images.

375.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 acted with malice and in callous and reckless and conscious disregard to Plaintiffs' rights of publicity thereby warranting an award of punitive damages.

COUNT XII
False Light

PLAINTIFFS v. DEFENDANTS WEBB, SCHULTZ, LUCAS WEBB, AI MODELFORGE, CREATORCORE, JOHN DOE 1 – LYNCH, JOHN DOE 2 – NOAH, AND JOHN DOES 6-50

376.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

377.   As set forth in great detail in the preceding paragraphs of Plaintiffs' Petition, Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's use of Plaintiffs' images and likenesses created the false and misleading impression that Plaintiffs approved of and participated in Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's business activities.

378.   Plaintiffs possess the exclusive right to the ownership and control of their images and likenesses for commercial purposes.

379.   At no time did Plaintiffs grant permission to Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 to use their names, images or likenesses for any purpose, commercial or otherwise.

380.   As set forth in the preceding paragraphs of Plaintiffs' Petition, Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 made public statements referencing Plaintiffs by publishing Plaintiffs' images and likenesses on the internet, using websites and social media platforms, including, but not limited to, using Plaintiffs' images and likenesses to advertise for their businesses such as AI ModelForge, CreatorCore, and subscription porn accounts on sites like Fanvue.

381.   The impression of Plaintiffs created by Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 would be highly offensive to a reasonable person.

382.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 knew the unauthorized use of Plaintiffs'

images and likenesses was false and misleading but still used Plaintiffs' images and likenesses as set forth in the preceding paragraphs of this Petition for Damages.

383. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions were willful, wanton and undertaken with reckless indifference to the false and misleading impression the actions would create about Plaintiffs.

384. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have caused and will continue to cause irreparable harm to Plaintiffs' reputations.

385. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions have caused Plaintiffs to suffer general damages including but not limited to harm to Plaintiffs' reputations and continued and ongoing mental and emotional damages.

386. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions have caused Plaintiffs to suffer monetary losses which they are entitled to recover from Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 in the amount of the fair market value of each direct or indirect use of their likenesses.

387. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's advertisements using Plaintiffs' images and likenesses have reached millions and millions of viewers, with a single post having generated over 16,000,000 views as of this writing.

388. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have profited directly or indirectly through the unlawful use of Plaintiffs' likenesses and images, entitling Plaintiffs to recover the entirety of the revenue Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John

Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50, and their businesses, have generated, directly or indirectly from the unlawful use of Plaintiffs' likenesses and images.

389.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 acted with malice and in callous, reckless and conscious disregard of placing Plaintiff in a false light, thereby warranting an award of punitive damages.

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COUNT XIII
Conversion
PLAINTIFFS v. DEFENDANTS WEBB, SCHULTZ, LUCAS WEBB, AI MODELFORGE, CREATORCORE, JOHN DOE 1 – LYNCH, JOHN DOE 2 – NOAH, AND JOHN DOES 6-50

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390.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

391.   At all times relevant, Plaintiffs were and are the exclusive owners of their images, likenesses and all unauthorized manifestations created thereof, whether created digitally or otherwise.

392.   As set forth in great detail in the preceding paragraphs of Plaintiffs' Petition, Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 converted Plaintiffs' property rights to their images and likenesses for their own use and financial gain.

393.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's advertisements using Plaintiffs' images and likenesses have reached millions and millions of viewers, with a single post having generated over 16,000,000 views as of this writing.

394.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions have caused Plaintiffs to suffer monetary losses which they are entitled to recover from Defendants Webb, Schultz, Lucas

Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 in the amount of the fair market value of each direct or indirect use of her likeness.

395. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 and their businesses have profited directly or indirectly through the unlawful use of Plaintiffs' likenesses and images, entitling Plaintiffs to recover the entirety of the revenue Defendants have generated, directly or indirectly from the unlawful use of Plaintiffs' likenesses and images.

396. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 acted with malice and in callous, reckless and conscious disregard to Plaintiffs' right of ownership to their own likenesses and images thereby warranting an award of punitive damages.

COUNT XIV
Unjust Enrichment
PLAINTIFFS v. DEFENDANTS WEBB, SCHULTZ, LUCAS WEBB, AI MODELFORGE, CREATORCORE, JOHN DOE 1 – LYNCH, JOHN DOE 2 – NOAH, AND JOHN DOES 6-50

397. Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

398. As set forth in great detail in the preceding paragraphs of Plaintiffs' Petition, Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 converted Plaintiffs' property rights to their images and likenesses for their own use and financial gain.

399. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 did benefit financially from the unauthorized use of Plaintiffs' images and likenesses.

400.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's use of Plaintiffs' images and likenesses has assisted Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 creating, promoting and otherwise making Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's business interests viable.

401.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have been unjustly enriched by the unauthorized use of Plaintiffs' images and likenesses.

402.   Plaintiffs have not been compensated by Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 for the use of Plaintiffs' images and likenesses.

403.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions have caused Plaintiffs to suffer monetary losses which they are entitled to recover from Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 in the amount of the fair market value of each direct or indirect use of her likeness.

404.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's advertisements using Plaintiffs' images and likenesses have reached millions and millions of viewers, with a single post having generated over 16,000,000 views as of this writing.

405.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have made significant unjust profits from the use of Plaintiffs images and likenesses in a number of different capacities.

a. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have used Plaintiffs' images

1 | and likenesses to advertise the AI ModelForge business driving traffic to that

2 | business through Plaintiffs' images and likenesses without their consent;

3 | b. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

4 | 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have used Plaintiffs' images

5 | and likenesses to advertise the CreatorCore business driving traffic to that

6 | business through Plaintiffs' images and likenesses;

7 | c. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

8 | 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have created social media

9 | accounts using Plaintiffs' images and likenesses which have generated profits

10 | through social media views;

11 | d. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

12 | 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have created subscription

13 | profiles on porn websites to profit from Plaintiffs' likenesses and images;

14 | e. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

15 | 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have used Plaintiffs images

16 | and likenesses as DFY influencers to unjustly profit from Plaintiffs' likenesses

17 | and images;

18 | f. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

19 | 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have used Plaintiffs' images

20 | and likenesses as trained and training models on AI ModelForge and CreatorCore

21 | where they have unjustly profited;

22 | g. Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

23 | 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have sold Plaintiffs' images

24 | and likenesses as their own through their businesses making unjust profit.

25 | 406.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

26 | 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have profited directly or indirectly through

27 | the unlawful use of Plaintiffs likenesses and images, entitling Plaintiffs to recover the entirety

1   of the revenue Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John

2   Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have generated, directly or indirectly

3   from the unlawful use of Plaintiffs' likenesses and images.

4   407.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

5   1 – Lynch, John Doe 2 – Noah, and John Does 6-50 acted with malice and in callous, reckless

6   and conscious disregard to Plaintiffs' right of ownership over their own images and likenesses

7   thereby warranting an award of punitive damages.

COUNT XV
Negligence Per Se in Violation of A.R.S. §13-2008.A
PLAINTIFFS v. DEFENDANTS WEBB, SCHULTZ, LUCAS WEBB, AI MODELFORGE, CREATORCORE, JOHN DOE 1 – LYNCH, JOHN DOE 2 – NOAH, AND JOHN DOES 6-50

408.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as though fully set forth herein.

409.   As set forth in great detail in the preceding paragraphs of Plaintiffs' Petition, Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 unlawfully took Plaintiffs' identity, through their images and likenesses, for their own use and financial gain.

410.   Defendants' actions violated *A.R.S. §13-2008A*:

A person commits taking the identity of another person or entity if the person knowingly takes, purchases, manufactures, records, possesses or uses any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of that other person or entity, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose or to cause loss to a person or entity whether or not the person or

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1   entity actually suffers any economic loss as a result of the offense, or with the intent

2   to obtain or continue employment.

3   411.   *A.R.S. §13-2008A* was enacted and intended to protect individuals from identity

4 theft in the State of Arizona.

5   412.   At the time of the negligence *per se* alleged above, Plaintiffs belonged to the class

6 of persons *A.R.S. §13-2008A* was intended to protect.

7   413.   As a direct and approximate result of the above negligence *per se* of Defendants

8 Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 –

9 Noah, and John Does 6-50, Plaintiffs sustained damages and will continue to suffer damages.

10   414.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

11 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have caused and will continue to cause

12 irreparable harm to Plaintiffs' reputation.

13   415.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

14 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions have caused Plaintiffs to suffer

15 general damages including but not limited to harm to Plaintiffs' reputation and continued and

16 ongoing mental and emotional damages.

17   416.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

18 1 – Lynch, John Doe 2 – Noah, and John Does 6-50's actions have caused Plaintiffs to suffer

19 monetary losses which she is entitled to recover from Defendants Webb, Schultz, Lucas Webb,

20 AI ModelForge, CreatorCore, John Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 in

21 the amount of the fair market value of each direct or indirect use of Plaintiffs' images and

22 likenesses.

23   417.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

24 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 have profited directly or indirectly through

25 the unlawful use of Plaintiffs' likenesses and images, entitling Plaintiffs to recover the entirety

26 of the revenue Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John

27

1 Doe 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 and their businesses have generated,

2 directly or indirectly from the unlawful use of Plaintiffs' likenesses and images.

3   418.   Defendants Webb, Schultz, Lucas Webb, AI ModelForge, CreatorCore, John Doe

4 1 – Lynch, John Doe 2 – Noah, and John Does 6-50 acted with malice and in callous, reckless

5 and conscious disregard of taking and using Plaintiffs' identities, thereby warranting an award

6 of punitive damages.

7   **COUNT XVI**
                               Defamation Per Se
8 **Plaintiffs M.G., H.R., & H.B. v. Defendants Webb, Schultz, Lucas Webb, John Doe 1 –**
   Lynch, John Doe 2 – Noah, John Doe 3 – Isaac, AI ModelForge, CreatorCore,
9   **and John Does 6-50**

10

11   419.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as

12 though fully set forth herein.

13   420.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 –

14 Noah, John Doe 3 – Isaac, AI ModelForge, CreatorCore and John Does 6-50 used generative

15 AI models to create AI influencers depicting Plaintiffs from clothed images of Plaintiffs stolen

16 from their personal social media accounts.

17   421.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 –

18 Noah, John Doe 3 – Isaac, AI ModelForge, CreatorCore and John Does 6-50 used the AI

19 influencers depicting Plaintiffs to generate nude, NSFW, pornographic, and fetish images and

20 videos of Plaintiffs.

21   422.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 –

22 Noah, John Doe 3 – Isaac, AI ModelForge, CreatorCore and John Does 6-50 published the

23 nude, NSFW, pornographic, and fetish images and videos depicting Plaintiffs in various

24 locations on the internet.

25   423.   Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 –

26 Noah, John Doe 3 – Isaac, AI ModelForge, CreatorCore and John Does 6-50 published the

27

nude, NSFW, pornographic, and fetish images and videos depicting Plaintiffs to themselves and others for personal use.

424. The aforementioned nude, NSFW, pornographic, and fetish images and videos of Plaintiffs were generated using solely clothed photos of Plaintiffs and generative AI models, including CreatorCore. These photos and videos are false depictions of Plaintiffs.

425. The aforementioned nude, NSFW, pornographic, and fetish images and videos of Plaintiffs were defamatory in nature as they presented Plaintiffs in stages of undress and sexual content which were created using generative AI and were false.

426. Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, John Doe 3 – Isaac, AI ModelForge, CreatorCore and John Does 6-50 knew at the time they generated the nude, NSFW, pornographic, and fetish content of Plaintiffs that the AI generated NSFW images and videos of Plaintiffs were false and not real.

427. As exhibited throughout this Petition, Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, John Doe 3 – Isaac, AI ModelForge, CreatorCore and John Does 6-50 acted with actual malice towards Plaintiffs in generating false nude, NSFW, pornographic, and fetish images and videos of Plaintiffs for publication.

428. Plaintiffs are private individuals and their bodily autonomy and private lives are private matters.

429. Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, John Doe 3 – Isaac, AI ModelForge, CreatorCore and John Does 6-50's defamation of Plaintiffs constitutes serious sexual misconduct.

430. Defendants Webb, Schultz, Lucas Webb, John Doe 1 – Lynch, John Doe 2 – Noah, John Doe 3 – Isaac, AI ModelForge, CreatorCore, and John Does 6-50, in publishing false images and videos of Plaintiffs, knew or reasonably should have expected those images and videos would have been repeated and shared by third parties.

1   431.   Plaintiffs have suffered damages as a result of Defendants Webb, Schultz, Lucas

2   Webb, John Doe 1 – Lynch, John Doe 2 – Noah, John Doe 3 – Isaac, AI ModelForge,

3   CreatorCore and John Does 6-50's serious sexual misconduct defamation of Plaintiffs.

COUNT XVII
Defamation Per Se
Plaintiffs M.G., H.R., & H.B. v. Defendants John Doe 4 – ByteDance,
John Doe 5 – WAN, and FAL

7   432.   Plaintiffs repeat and reallege all of the foregoing allegations of this Petition as

8   though fully set forth herein.

9   433.   Defendants John Doe 4 – ByteDance, John Doe 5 – WAN, and FAL used

10   generative AI models to create AI influencers depicting Plaintiffs from clothed images of

11   Plaintiffs stolen from their personal social media accounts.

12   434.   Defendants John Doe 4 – ByteDance, John Doe 5 – WAN, and FAL's generative

13   AI used the AI influencers depicting Plaintiffs to generate nude, NSFW, pornographic, and

14   fetish images and videos of Plaintiffs.

15   435.   Defendants John Doe 4 – ByteDance, John Doe 5 – WAN, and FAL published

16   the nude, NSFW, pornographic, and fetish images and videos depicting Plaintiffs on Defendant

17   FAL's website for view and use by third parties.

18   436.   The aforementioned nude, NSFW, pornographic, and fetish images and videos of

19   Plaintiffs were generated using solely clothed photos of Plaintiffs and generative AI models,

20   including ByteDance, WAN, and FAL. These photos and videos are false depictions of

21   Plaintiffs.

22   437.   The aforementioned nude, NSFW, pornographic, and fetish images and videos of

23   Plaintiffs were defamatory in nature as they presented Plaintiffs in stages of undress and sexual

24   content which were created using generative AI and were false.

25   438.   Defendants John Doe 4 – ByteDance, John Doe 5 – WAN, and FAL knew at the

26   time nude, NSFW, pornographic, and fetish content of Plaintiffs were published by Defendants

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John Doe 4 – ByteDance, John Doe 5 – WAN, and FAL that the AI generated NSFW images and videos of Plaintiffs were false and not real.

439. As exhibited throughout this Petition, Defendants John Doe 4 – ByteDance, John Doe 5 – WAN, and FAL acted with actual malice towards Plaintiffs in generating and publishing false nude, NSFW, pornographic, and fetish images and videos of Plaintiffs.

440. Plaintiffs are private individuals and their bodily autonomy and private lives are private matters.

441. Defendants John Doe 4 – ByteDance, John Doe 5 – WAN, and FAL's defamation of Plaintiffs constitutes serious sexual misconduct.

442. Defendants John Doe 4 – ByteDance, John Doe 5 – WAN, and FAL, in publishing false images and videos of Plaintiffs on the internet and to third party users, knew or reasonably should have expected those images and videos would have been repeated and shared by third parties.

443. Plaintiffs have suffered damages as a result of Defendants John Doe 4 – ByteDance, John Doe 5 – WAN, and FAL's serious sexual misconduct defamation of Plaintiffs.

WHEREFORE, Plaintiffs respectfully request this Court enter judgment against all Defendants on all Counts of Plaintiffs' Petition for Damages and award a fair and reasonable amount in excess of the jurisdictional amount for this Court to adequately compensate Plaintiffs for all damages they have suffered, prejudgment interest, post-judgment interest, the costs of this action, and such other and further relief as this Court deems just and proper.

RESPECTFULLY SUBMITTED this 22nd day of January, 2026.

PEREZ LAW GROUP, PLLC

/s*/ Cristina Perez Hesano*

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