

ULTRAVIOLET ACTION

May 19, 2026

National Association of Attorneys General
1850 M Street NW, 12th floor
Washington, DC 20036

Dear Attorneys General,

We are a bipartisan coalition of 54 U.S.-based civil society organizations calling for legal action from state and territory attorneys general against leading technology and financial companies responsible for the proliferation of non-consensual exploitative materials (NCEM), also known as non-consensual intimate imagery (NCII), deepfake pornography, and deepfake abuse. **While we encourage appropriate action against all culpable technology and financial companies, we write today to specifically request accountability for the app store industry's role in facilitating the proliferation of NCEM.**

In August 2025, a bipartisan coalition of 47 state and territory attorneys general issued formal letters to leading technology and financial companies calling on them to take decisive action against the proliferation of NCEM.¹ The letter helpfully laid out the growing threat of NCEM and requested specific action items from search platforms and payment processors in particular to yield more decisive and coordinated action against NCII and mitigate further harm. And in January 2026, another bipartisan coalition of 35 attorneys general wrote to xAI demanding answers on how the company planned to stop the widespread production of NCEM — including sexually abusive content involving children.²

Unfortunately, those requests and warnings have not been heeded by search platforms, payment processors, and other major technology firms that play pivotal roles in propping up the ecosystem of deepfake abuse. Rather, these firms have blatantly and disrespectfully disregarded your requests by ignoring safety concerns, in turn enabling an exponential increase in digital sexual abuse online for a handsome profit. Notably, these platforms are not just ignoring AG recommendations, but the legal mandates required by the Take It Down Act, which takes effect for covered platforms as of today, May 19, 2026.

As you are aware, this crisis reached a boiling point in January 2026, when xAI's chatbot Grok, which is integrated into X, was used to create an estimated 3 million sexual deepfakes, including an estimated 23,000 depicting children.³ But this specific epidemic was truly just the tip of the iceberg. Grok's role in this crisis was visible to the public because of the integration of Grok into X's public social media

¹ [Search and Payment Platforms Urged to Address Deepfake Nonconsensual Intimate Imagery \(NCII\)](#), National Association of Attorneys General, August 22, 2025

² [Acting AG Davenport Demands Immediate Action from xAI to Stop Production of Nonconsensual Intimate Images and Child Sexual Abuse Material](#), New Jersey Office of Attorney General, January 26, 2026

³ [Grok floods X with sexualized images of women and children](#), Center for Countering Digital Hate, January 22, 2026

platform, but Grok is one of dozens of AI apps that are offered on app stores from Apple and Google that facilitate the creation of deepfakes. Many of the apps on the app stores that have this functionality are rated for children as young as 4 years old.⁴

Arguably, Grok's creation of these non-consensual sexual deepfakes and the corresponding public viewing of them was the largest sex abuse scandal of our time, and this sheds light on the particularly pivotal role that companies running major app stores — namely, Apple and Google — play in:

1. Platforming deepfake or “nudify” apps
2. Profiting off of deepfake abuse
3. Directing users to deepfake or “nudify” apps through ads and algorithmic amplification

Overall, we argue that these two companies, by way of their respective app stores, are culpable for enabling NCEM and the resulting widespread deepfake abuse, including child sexual abuse.⁵ **This moment is a critical opportunity for this bipartisan coalition of attorneys general to follow up on its August 2025 and January 2026 letters with direct legal action.**

While we were encouraged to see one investigation launched by California Attorney General Rob Bonta investigating Grok and xAI,⁶ as well as a bipartisan coalition letter from 35 attorneys general demanding greater action from xAI to protect users from NCEM,⁷ we strongly believe that this moment calls for more urgent action from your coalition and respective offices, particularly against Apple and Google for continuing to profit from Grok, X, and numerous other deepfake or “nudify” apps on their respective app stores. Doing so is not just essential for consumer safety, but also for the safety of the entire public. It's not only non-profit groups that are aware of and alarmed by this problem — polling demonstrates that the public overwhelmingly favors protection from deepfakes and stronger regulation of AI.^{8,9}

Grok and X are just two of many apps used to create NCEM that Apple and Google are hosting and profiting from. In late January 2026, Tech Transparency Project (TTP) released a report identifying 55 apps in the Google Play Store that can “digitally remove the clothes from women and render them completely or partially naked or clad in a bikini or other minimal clothing,” and 47 such apps in the Apple App Store.¹⁰ These numbers are likely undercounts, given that they were identified using a focused methodology with a select set of keywords. In response to TTP's report, Apple removed 27 of the identified apps and Google removed 31 (many of Google's removals were later reinstated). Neither company explained why the remaining apps were left up or provided plans to further investigate either a) why the remaining apps did not violate company policy or b) efforts to mitigate the platforming of

⁴ COURIER Media <https://www.youtube.com/watch?v=bJ9XTPwt7cs>

⁵ [New Research Finds Apple App Store and Google Play Target Users with Ads for “Nudify” Apps](#), National Center on Sexual Exploitation (NCOSE), April 17, 2026

⁶ [Attorney General Bonta Launches Investigation into xAI. Grok Over Undressed. Sexual AI Images of Women and Children](#), State of California Department of Justice, January 14, 2026

⁷ [Attorney General Jeff Jackson Leads Bipartisan Coalition Demanding xAI Stop Creating and Remove Grok's Nonconsensual Sexual Images](#), Attorney General Jeff Jackson, January 23, 2026

⁸ [4 in 5 People Want Protection Against AI Deepfakes](#), Government Technology, September 3, 2026

⁹ [Years of Polling Show Overwhelming Voter Support for a Crackdown on AI](#), Public Citizen, November 21, 2025

¹⁰ [Nudify Apps Widely Available in Apple and Google App Stores](#), Tech Transparency Project, January 27, 2026

abusive apps in the future. In addition, neither Apple nor Google have provided information on what each company does with the millions of dollars in revenue generated by apps that were removed for violations of their company policies on the creation of non-consensual nude imagery.

It's impossible to ignore the motivation for Apple and Google's refusal to hold apps to their own prohibited content policies: money. The abusive "nudify" apps identified have collectively brought a significant amount of money to the two companies. At the time of reporting, the apps identified by TTP were collectively downloaded more than 705 million times worldwide and generated \$117 million in revenue. Recent reporting (as of April 2026) found an even higher estimate: \$122 million in lifetime revenue.¹¹ Given that Apple and Google typically take a 15% to 30% cut of app revenue,¹² it's safe to assume that each company is making millions off of these apps, and therefore millions off of the abuse of women and girls. In a lawsuit filed by Epic Games, Apple defended its in-app purchase fee as necessary to "to prove a safe, secure, and reliable experience for users," but that is not reflected in the repeated violations of the company's prohibitions on "nudify" apps.¹³

Further evidence of Apple and Google's financial stake in these abusive apps is that both stores are actively directing users to them. On April 15, TTP released a follow-up report regarding the role of the app stores' search functions in directing users to "nudify" apps. What they found is damning. Approximately 40% of the apps surfaced from keyword searches like "nudify" and "undress" could "render women nude or scantily clad." The report went on to reveal that Apple and Google are running paid ads for "nudify" apps in some of the search results and even suggesting search terms that lead to more abusive AI "nudify" apps. Perhaps most jarring of all: 31 of the identified apps were rated suitable for minors.¹⁴

The moment for decisive investigative and legal action from your coalition of attorneys general concerned about NCEM is *now*. There is no more time for more warnings; no more space for letters and meetings. The evidence is clear: Apple's App Store and Google's Play Store are driving and profiting from the deepfake abuse epidemic, and the consequences are severe — both for survivors, and for our society at large being numbed to this scale of abuse against women and children. Through surveys and coalition meetings, we have heard about these consequences directly from impacted people consumed by this violence or the threat of it.

As one survivor bravely put it in an UltraViolet survey: "No matter how hard I tried to detach my reality from the digital absurdity before me, the visuals felt like a violation; an assault on my dignity, integrity, and very existence. The woman in the video was me, yet it wasn't —I didn't recognize that version of myself, stripped bare and exposed in a cruel twist of technology."¹⁵ Another survey respondent shared: "I am a high school teacher and have seen this happen to minors/teens. It is appalling and deeply

¹¹ [Apple and Google Are Steering Users to Nudify Apps](#), Tech Transparency Project, April 15, 2026

¹² [Google Play and App Store Fees: List of Costs That App Owners Pay in 2025](#), Split Metrics, August 5, 2025

¹³ [Appeal from the United States District Court for the Northern District of California Yvonne Gonzalez Rogers, District Judge, Presiding](#), Epic Games Inc. v. Apple Inc., November 14, 2022

¹⁴ [Apple and Google Are Steering Users to Nudify Apps](#), Tech Transparency Project, April 15, 2026

¹⁵ [Reclaim the Domain – Groundbreaking Data](#), UltraViolet, accessed April 28, 2026

damaging to the victims, and can foment suicide.”¹⁶ **These psychological harms are well-evidenced, and it is unconscionable that Apple and Google would willingly enable, profit from, and direct users to commit this abuse for company gain.**

Finally, on top of the illegality, psychological damage, and moral damage that these “nudify” apps cause, these apps pose potential national privacy and security risks. A number of the apps identified by TTP listed Chinese developers, meaning such apps are governed by China’s national security laws that force the sharing of user data with the Chinese government.¹⁷ These connections to China are not disclosed by either Apple or Google, raising further concerns about how the companies may be failing to inform users about data privacy risks. The existence of these sexually abusive images of real people is horrifying in and of itself, but the idea of the government of a foreign adversary having access to a trove of these highly sexualized images adds another crucial layer of risk.

Given the pivotal role that Apple and Google’s respective app stores are playing in enabling, profiting from, and directing users to engage in deepfake abuse, we are calling on your powerful, bipartisan coalition of attorneys general to take immediate action to hold Apple and Google accountable — both at the state level, and as a collective.

We greatly appreciate your attention to this serious matter and are available to meet or conduct a briefing on this issue if that is of interest.

Sincerely,

UltraViolet Action
Autistic Women & Nonbinary Network
California Initiative for Technology and Democracy
Central Oregon Coast National Organization for Women
Charlottesville NOW
Columbia NOW, SC
Consumer Federation of America
Democracy Out Loud
Earth Ethics, Inc.
EducateUS
Electronic Privacy Information Center (EPIC)
Equality Now
Fairplay
Florida Chapter National Organization for Women
Free Press Action
Friends of the Earth US
GA NOW

¹⁶ Ibid.

¹⁷ [Apple and Google Are Steering Users to Nudify Apps](#), Tech Transparency Project, April 15, 2026

Heat Initiative, Inc.
Illinois National Organization for Women
Justice and Joy National Collaborative
Kairos Action
Legal Momentum, the Women's Legal Defense & Education Fund
Middlesex County, NJ Chapter - National Organization for Women (NOW)
Missing Murdered Indigenous Women Coalition of North Carolina
Monsoon Asians & Pacific Islanders in Solidarity
Morris County (NJ) NOW
MPower Change
National Organization for Women (NOW)
National Organization for Women, Columbia Area
National Organization for Women, Missouri
National Organization For Women, NJ Chapter
National Organization of API Ending Sexual Violence
National Women's Political Caucus
North Carolina NOW
Oak Grove Retreat
Ohio National Organization for Women
Open MIC (Open Media and Information Companies Initiative)
Oregon National Org. for Women
Our Bodies Ourselves
People Power United
Pinellas County NOW
Reproaction
ReproUncensored
Scrolling 2 Death
Sexual Violence Prevention Association (SVPA)
Suffolk NOW
Survivors & Tech Solving Image Based Sexual Abuse (STISA)
Tech Justice Law
Tech Oversight Project
The Susan Jolley Foundation
United Church of Christ Media Justice Ministry
Virginia NOW
Vote Run Lead Action
Women's Media Center Speech Project