1	DAVID CHIU, SBN 189542			
	City Attorney ELECTRONICA CITY ATTORNEY			
2	YVONNE R. MERÉ, SBN 173594			
2	Chief Deputy City Attorney	FILED		
3	SARA J. EISENBERG, SBN 269303	Superior Court of California, County of San Francisco		
4	Chief of Complex and Affirmative Litigation		00/42/2025	
4	RONALD H. LEE, SBN 238720		06/13/2025 Clerk of the Court	
5	KARUN A. TILAK, SBN 323939		BY: JUDITH NUNEZ	
ا '	MIGUEL A. GRADILLA, SBN 304125 DAVID S. LOUK, SBN 304654		Deputy Clerk	
6	Deputy City Attorneys			
~	Fox Plaza			
7	1390 Market Street, 6th Floor		[Exempt from Filing Fees	
·	San Francisco, CA 94102-5408		Government Code § 6103]	
8	Telephone: (415) 355-3308 (Tilak)			
	(415) 554-3870 (Gradilla)			
9	(415) 355-3314 (Louk)			
	Facsimile: (415) 437-4644			
10	E-Mail: Karun.Tilak@sfcityatty.org			
	Miguel.Gradilla@sfcityatty.org			
11	David.Louk@sfcityatty.org			
12	C DI : : : C			
12	Attorneys for Plaintiff	4 1		
13	PEOPLE OF THE STATE OF CALIFORNIA, &			
13	and through San Francisco City Attorney DAVI	D CHIU		
14				
SUPERIOR COURT OF THE STATE OF CALIFORNIA				
15				
	COUNTY OF SAN FRANCISCO			
16				
	UNLIMITE	D JURISDICTION		
17				
10	DEODY E OF THE CTATE OF CALLEODALA	la N ccc M	(17027	
18	PEOPLE OF THE STATE OF CALIFORNIA,	Case No. CGC-24	-61/23/	
19	acting by and through San Francisco City	DECLADATION	I OE IZADIINI A TII AIZINI	
19	Attorney DAVID CHIU,		N OF KARUN A. TILAK IN LAINTIFF PEOPLE OF THE	
20	Plaintiff,		IFORNIA'S MOTION FOR	
ا ۲	i iaiitiii,		SERVICE ON DEFENDANT	
21	VS.	SOL ECOM, INC		
	V 5.	SOL LCOM, III	C •	
22	SOL ECOM, INC., BRIVER LLC, ITAI	Hearing Date:	July 9, 2025	
	TECH LTD., DEFIREX OÜ, CODEBIONIC	Hearing Time:	11:00 a.m.	
23	LABS OÜ, AUGUSTIN GRIBINETS,	Hearing Judge:	Hon. Ethan Schulman	
	ARTEM ÁSHIRBEKOV, BAKHADÝR	Hearing Dep't:	304	
24	ASHIRBEKOV, RICHARD TANG,			
_	GAOFAN (SIMON) XU, and DOES #1	Date Action Filed	: August 14, 2024	
25	through #50,		August 16, 2024 (FAC)	
,	D.C. 1		March 10, 2025 (SAC)	
26	Defendants.			
27				
- ′	1			

DECLARATION

- I, Karun A. Tilak, declare:
- 1. I am an attorney licensed to practice law in the state of California. I am a Deputy City Attorney with the San Francisco City Attorney's Office, and I am counsel for Plaintiff the People of the State of California ("People") in this matter.
- 2. I submit this declaration in support of the People's Motion for Alternative Service on Defendant Sol Ecom, Inc. I have knowledge of the facts set forth herein, and if called upon as a witness, I could testify to them competently under oath.
- 3. Attached hereto as Exhibit 1 is a true and correct copy of an annual report for Sol Ecom Inc., filed on April 29, 2025, and obtained from the website of the Florida Secretary of State.
- 4. The principal place of business listed in Sol Ecom, Inc. in Exhibit 1 is "177 Concord Street, Apartment 730 Apt. 4F Brooklyn, CA 11201." There does not appear to be any such address. For example, 11201 is a New York zip code, there appears to be no municipality of Brooklyn, CA, and the listed address includes two different apartment numbers.
- 5. An investigator working under my supervision reviewed public record databases, including the CLEAR online database, for addresses associated with Kyrylo Ivannyk, the sole officer and registered agent of Sol Ecom, Inc.
- 6. The investigator identified 177 Concord St., Apartment 4F, Brooklyn, NY 11201 as a current address associated with Ivannyk. Based on information in the CLEAR database, it appears that this Brooklyn address has been associated with Ivannyk since at least June or July 2024. It appears that the principal place of business listed for Sol Ecom, Inc. in Exhibit 1 is this Brooklyn address, and the references to "Apartment 730" and "CA" in fact refer to the mailing address listed in Exhibit 1, 610 S. Main Street, Apt. 730, Los Angeles, CA 90014. This Los Angeles address was also previously listed as Sol Ecom, Inc.'s principal place of business. (*See* Exhibits 2–4, *infra.*)
- 7. The investigator also identified a second potential current address for Ivannyk: 350 Warren Street, Apt. 609, Jersey City, New Jersey 07302.

- 8. Attached hereto as Exhibit 2 is a true and correct copy of an annual report for Sol Ecom, Inc., filed on July 26, 2024, and obtained from the website of the Florida Secretary of State.
- 9. Attached hereto as Exhibit 3 is a true and correct copy of a 2023 Florida Profit Corporation Reinstatement of Sol Ecom, Inc., filed on October 5, 2023, and obtained from the website of the Florida Secretary of State.
- 10. Attached hereto as Exhibit 4 is a true and correct copy of an annual report for Sol Ecom, Inc., filed on Feb. 1, 2022, and obtained from the website of the Florida Secretary of State.
- 11. Attached hereto as Exhibit 5 is a true and correct copy of the articles of incorporation of Sol Ecom, Inc., filed on Sept. 9, 2021, and obtained from the website of the Florida Secretary of State.
- 12. On March 25, 2025, staff working under my supervision mailed the SAC, civil case cover sheet, ADR package, and summons to Sol Ecom, Inc. (care of Kyrylo Ivannyk) at 177 Concord Street, Apartment 4F, Brooklyn, NY 11201 using United States Postal Service ("USPS") certified mail with return receipt requested.
- 13. On May 14, 2025, USPS returned the package to our Office undelivered. The envelope had the flowing message: "Return to Sender Unclaimed, Unable to Forward, Return to Sender."
- 14. On March 25, 2025, staff working under my supervision mailed the SAC, civil case cover sheet, ADR package, and summons to Sol Ecom, Inc. (care of Kyrylo Ivannyk) at 610 S. Main St., Apt. 730, Los Angeles, CA 90014 using USPS certified mail with two copies of the Notice and Acknowledgment of Receipt form (POS-015) enclosed.
- 15. On April 11, 2025, USPS returned the package to our Office undelivered. The envelope had the following message: "Return to Sender, Attempted Not Known, Unable to Forward."
- 16. On March 25, 2025, staff working under my supervision mailed the SAC, civil case cover sheet, ADR package, and summons to Kyrylo Ivannyk as registered agent for Sol Ecom, Inc. at 3301 NE 1st Ave., Apt. 302, Miami, FL 33137 using USPS certified mail with return receipt requested.

- 17. On April 25, 2025, USPS returned the package to our Office undelivered. The envelope had the following message: "Return to Sender, Refused, Unable to Forward."
- 18. During the course of this litigation, the People served a subpoena on Cloudflare, Inc., which provides webhosting and other services for websites. The People's subpoena sought records related to the domain names clothoff.io and drawnudes.io.
- 19. With respect to clothoff.io, the records produced by Cloudflare referenced two email addresses: islam7450@yandex.ru and cloudflaree@yandex.ru. With respect to drawnudes.io, the records produced by Cloudflare referenced the email address aiimagecraft01@gmail.com.
- 20. During the course of this litigation, the People served a subpoena on Namecheap, Inc., which provides domain registrar services for websites. The People's subpoena sought records related to the domain name drawnudes.io and clothoff.io, for which Namecheap served as the domain registrar.
- 21. With respect to clothoff.io, the records produced by Namecheap referenced the following email address: abigelwinston@gmail.com. With respect to drawnudes.io, the records produced by Namecheap referenced the following email address: alibarigit@gmail.com.
- 22. During the course of this litigation, the People served a subpoena on Name.com, which provides domain registrar services for websites. The People's subpoena sought records related to the domain name clothoff.io, for which Name.com previously served as the domain registrar.
- 23. With respect to clothoff.io, the records produced by Name.com referenced the following email address: alec19981@proton.me.
- 24. On December 12, 2024, I emailed, *inter alia*, each of the email addresses listed in Paragraphs 19–23 to provide them notice of the People's request for an extension of time to serve the First Amended Complaint. I also emailed email addresses associated with other Defendants named in the First Amended Complaint.
- 25. On December 25, 2024, I received a response from alibarigit@gmail.com disputing the allegations in the complaint. I responded to the email, and received a further response from

alibarigit@gmail.com on January 4, 2025. Attached hereto as Exhibit 6 is a true and correct copy of my correspondence with alibarigit@gmail.com.

- 26. While I did not receive a response from islam7450@yandex.ru, cloudflaree@yandex.ru, aiimagecraft01@gmail.com, abigelwinston@gmail.com, or alec19981@proton.me, the emails were not returned as undeliverable. Of note, I did receive undeliverable error messages for email addresses associated with *other* Defendants.
- 27. On April 7, 2025, I emailed, *inter alia*, each of the email addresses listed in Paragraphs 19–23 to provide them notice of the People's request for an extension of time to serve the Second Amended Complaint. I also emailed email addresses associated with other Defendants named in the Second Amended Complaint.
- 28. I received notifications from Microsoft Outlook indicating that delivery of the emails to aiimagecraft01@gmail.com, abigelwinston@gmail.com, alibarigit@gmail.com, and alec19981@proton.me was complete. I did not receive such a notification for islam7450@yandex.ru or cloudflaree@yandex.ru, nor did I receive a notification indicating that the emails sent to those two email addresses were undeliverable. Of note, I received undeliverable error messages for email addresses associated with *other* Defendants.
- 29. During the course of this litigation, the People served a subpoena to Google LLC. The subpoena sought records related to clothoff.io and drawnudes.io. Google produced responsive records on June 6, 2025. With respect to both websites, the records produced by Google referenced two email addresses: clothanalytics@gmail.com and datastatys@gmail.com.
- 30. On June 13, 2025, I emailed notice regarding the People's forthcoming motion for alternative service to the email addresses listed in Paragraphs 19–23 and to clothanalytics@gmail.com and datastatys@gmail.com. I received notifications from Microsoft Outlook indicating that delivery of the emails to aiimagecraft01@gmail.com, abigelwinston@gmail.com, alibarigit@gmail.com, alec19981@proton.me, and datastatys@gmail.com was complete. I received an error message that the email was undeliverable to clothanalytics@gmail.com.

- 31. Attached hereto as Exhibit 7 is a true and correct PDF copy of the LinkedIn profile for "Cyril Ivannik" taken on May 26, 2025.
- 32. Attached hereto as Exhibit 8 is a true and correct PDF copy of the "Activity" page for the LinkedIn profile of "Cyril Ivannik" taken on May 26, 2025.
- 33. Attached hereto as Exhibit 9 is a true and correct copy of the corporate registration documents for Sol Amber Group, Ltd. obtained from the Government of the United Kingdom Companies House. The corporate registration document lists Kyrylo Ivannyk as the company director.
- 34. Attached hereto as Exhibit 10 is a true and correct copy of pages from website for SIRKA CPA, www.s-i-r-k-a.com, taken on May 26, 2025. The website lists its operator as Sol Ecom, Inc. with an address of 3301 NE 1st Ave, Unit 302, Miami, Florida 33137.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 13, 2025 in San Francisco, California.

By:_____KARUN A. TILAK

2025 FLORIDA PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# P21000080157

Entity Name: SOL ECOM INC

Current Principal Place of Business:

177 CONCORD ST. APT 730 APT 4F BROOKLYN, CA 11201 FILED
Apr 29, 2025
Secretary of State
9475129937CC

Current Mailing Address:

610 S MAIN ST APT 730 LOS ANGELES, CA 90014 US

FEI Number: 87-2588833 Certificate of Status Desired: No

Name and Address of Current Registered Agent:

IVANNYK, KYRYLO 3301 NE 1ST AVE 302 MIAMI, FL 33137 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: KYRYLO IVANNYK 04/29/2025

Electronic Signature of Registered Agent Date

Officer/Director Detail:

Title F

Name IVANNYK, KYRYLO Address 610 S MAIN ST

APT 730

City-State-Zip: LOS ANGELES CA 90014

SIGNATURE: KYRYLO IVANNYK

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

CEO

Electronic Signature of Signing Officer/Director Detail

04/29/2025 Date

2024 FLORIDA PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# P21000080157 Entity Name: SOL ECOM INC

Current Principal Place of Business:

610 S MAIN ST **APT 730**

LOS ANGELES, CA 90014

Current Mailing Address:

610 S MAIN ST **APT 730** LOS ANGELES, CA 90014 US

FEI Number: 87-2588833 Certificate of Status Desired: No

Name and Address of Current Registered Agent:

IVANNYK, KYRYLO 3301 NE 1ST AVE MIAMI, FL 33137 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: KYRYLO IVANNYK 07/26/2024

> Electronic Signature of Registered Agent Date

Officer/Director Detail:

Title

IVANNYK, KYRYLO Name 610 S MAIN ST Address

APT 730

City-State-Zip: LOS ANGELES CA 90014

SIGNATURE: KYRYLO IVANNYK

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

Electronic Signature of Signing Officer/Director Detail

PRESIDENT

FILED Jul 26, 2024

Secretary of State

3786286146CC

Date

07/26/2024

2023 FLORIDA PROFIT CORPORATION REINSTATEMENT

DOCUMENT# P21000080157

Entity Name: SOL ECOM INC

Current Principal Place of Business:

610 S MAIN ST **APT 730**

LOS ANGELES, CA 90014

Current Mailing Address:

610 S MAIN ST **APT 730** LOS ANGELES, CA 90014 US

FEI Number: 87-2588833 Certificate of Status Desired: No

Name and Address of Current Registered Agent:

IVANNYK, KYRYLO 3301 NE 1ST AVE MIAMI, FL 33137 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: KYRYLO IVANNYK 10/05/2023

> Electronic Signature of Registered Agent Date

Officer/Director Detail:

Title

IVANNYK, KYRYLO Name 610 S MAIN ST Address

APT 730

City-State-Zip: LOS ANGELES CA 90014

SIGNATURE: KYRYLO IVANNYK

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

Electronic Signature of Signing Officer/Director Detail

PRESIDENT

FILED Oct 05, 2023

Secretary of State

7856770453CR

Date

10/05/2023

2022 FLORIDA PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# P21000080157

Entity Name: SOL ECOM INC

Current Principal Place of Business:

610 S MAIN ST APT 730

FILED Feb 01, 2022 **Secretary of State** 5285947990CC

Current Mailing Address:

LOS ANGELES, CA 90014

610 S MAIN ST **APT 730** LOS ANGELES, CA 90014 US

FEI Number: 87-2588833 Certificate of Status Desired: No

Name and Address of Current Registered Agent:

IVANNYK, KYRYLO 3301 NE 1ST AVE MIAMI, FL 33137 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail:

Title

IVANNYK, KYRYLO Name 610 S MAIN ST Address

APT 730

City-State-Zip: LOS ANGELES CA 90014

SIGNATURE: KYRYLO IVANNYK

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

Electronic Signature of Signing Officer/Director Detail

PRESIDENT

02/01/2022 Date

Electronic Articles of Incorporation For

P21000080157 FILED September 09, 2021 Sec. Of State koriley

SOL ECOM INC

The undersigned incorporator, for the purpose of forming a Florida profit corporation, hereby adopts the following Articles of Incorporation:

Article I

The name of the corporation is:

SOL ECOM INC

Article II

The principal place of business address:

3301 NE 1ST AVE APT 302 MIAMI, FL. US 33137

The mailing address of the corporation is:

3301 NE 1ST AVE APT 302 MIAMI, FL. US 33137

Article III

The purpose for which this corporation is organized is: ANY AND ALL LAWFUL BUSINESS.

Article IV

The number of shares the corporation is authorized to issue is: 100

Article V

The name and Florida street address of the registered agent is:

KYRYLO IVANNYK 3301 NE 1ST AVE 302 MIAMI, FL. 33137

I certify that I am familiar with and accept the responsibilities of registered agent.

Registered Agent Signature: KYRYLO IVANNYK

Article VI

The name and address of the incorporator is:

KYRYLO IVANNYK 3301 NE 1ST AVE 302 MIAMI FL 33137 P21000080157 FILED September 09, 2021 Sec. Of State koriley

Electronic Signature of Incorporator: KYRYLO IVANNYK

I am the incorporator submitting these Articles of Incorporation and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of this corporation and every year thereafter to maintain "active" status.

Article VII

The initial officer(s) and/or director(s) of the corporation is/are:

Title: P KYRYLO IVANNYK 3301 NE 1ST AVE APT 302 MIAMI, FL. 33137 US

Article VIII

The effective date for this corporation shall be:

09/09/2021

From: A

To: <u>Tilak, Karun (CAT)</u>

Subject: Re: People v. Sol Ecom, et al., SF Super. Ct. case no. CGC-24-617237: Application for Extension of Time

Date: Saturday, January 4, 2025 12:34:52 AM

Dear Karun,

In Australia, the regulator wrote a list of requirements to fulfill in order not to violate anything, we have fulfilled it. If you have any recommendations, please could you send them in text.

If you think that in any way the site can't work in San Francisco - please tell us about it.

Sincerely

On Fri, Jan 3, 2025 at 2:52 AM Tilak, Karun (CAT) < <u>Karun. Tilak@sfcityatty.org</u>> wrote:

Good Afternoon,

Thank you for your email. We understand that you operate the website <u>drawnudes.io</u>. Please confirm whether the policies described in your email below apply to any other websites so that we can evaluate the information appropriately.

We would also like to set up a phone call to discuss some additional questions we have about the information provided below. Please let us know your availability next week (January 6-10) for a phone call.

Finally, please let us know if you are represented by an attorney in this matter. If so, we will direct our correspondence to your attorney and set up a meeting with them.

Sincerely,



Karun Tilak

Deputy City Attorney

Office of City Attorney David Chiu

Phone: (415) 355-3308

Email: karun.tilak@sfcityatty.org

www.sfcityattorney.org

From: Ali alibarigit@gmail.com>

Sent: Wednesday, December 25, 2024 10:36 PM
To: Tilak, Karun (CAT) < Karun. Tilak@sfcityatty.org >

Subject: Re: People v. Sol Ecom, et al., SF Super. Ct. case no. CGC-24-617237:

Application for Extension of Time

Dear Karun Tilak,

I have received your letter and was quite surprised to learn that our resource may be considered in breach of any law and is under review in your proceedings. Please allow me to clarify the following points that might help shed more light on the matter:

1. Restricting Access to Minors

Our service is intended **exclusively for adult users**. We employ various mechanisms and age-verification tools to prevent minors from accessing the platform. In addition, we have implemented an **RTA** (**Restricted to Adults**) label, ensuring that devices with parental controls and safe internet filters automatically block access to our service. Any posting or viewing of content that violates the law results in immediate blocking and removal of such material.

2. Ban on Uploading Content Involving Minors and Without Consent

We strictly prohibit the uploading of any content featuring individuals under the age of majority, as well as any photos or videos obtained **without the consent** of all participants. **Instant Detection Technology:** We deploy specialized analysis and filtering tools that **do not allow** such materials to be uploaded. The system simply displays an error and blocks any attempt to upload content involving minors.

3. Compliance with the Law

We operate **legally** in our jurisdiction and adhere to the requirements of both local and international law. All users and partners are obliged to follow our Terms of Service. Whenever violations by users or partners are detected, we respond promptly and take all necessary measures.

4. Active Cooperation with Law Enforcement

Should any questions arise from investigative or other authorized bodies, we provide full support and disclose data strictly in accordance with the law. We have already had instances

in which we assisted investigations by furnishing the required information.

5. No Conditions for Bullying or Aggression

Our platform **is not designed** to facilitate any aggressive, offensive, or illegal activities. **There are no galleries, forums, or other avenues** on our platform where users can directly exchange information or engage in discussions. Consequently, **there are no tools** enabling bullying, harassment, or any other forms of aggressive behavior. We make every effort to maintain a safe environment focused solely on consensual adult content.

6. Willingness to Cooperate and Implement Recommendations

We remain open to dialogue with regulatory and oversight bodies in any country. If we receive **official recommendations** or requirements to strengthen security measures or restrict access, we review them as a priority and implement all necessary changes.

• **Example:** We were recently contacted by <u>eSafety Australia</u>, which communicated specific requirements to our service. We fully complied with those requirements and were confirmed to be in full alignment with their upcoming AI legislation set to take effect in January 2025.

7. Ongoing Enhancement of Internal Policies and Processes

We regularly conduct **impact assessments** and develop **mitigation plans**, continually improving our security and moderation mechanisms. In the near future, we plan to publish detailed information about our collaboration with law enforcement agencies and the additional safety measures we are taking to protect users.

8. Flexibility and Respect for Local Regulations

We strive to provide a high level of protection for users in various countries. Should a regulatory authority in a specific jurisdiction formally request service limitation or deactivation, we possess the technical capacity to comply. At the same time, we remain committed to upholding users' rights and freedoms while strictly adhering to legal frameworks.

9. Open Dialogue and Feedback

We value transparency and are always open to feedback from government authorities, human rights organizations, and users. If there are comments or suggestions for improving our control and safety mechanisms, we will consider them swiftly and implement any necessary measures in line with legal regulations.

10. Maximum Readiness to Cooperate with the Regulator

We seek not only to comply with existing requirements but also to remain open to any additional recommendations or clarifications from the regulator. We request assistance in understanding any possible reasons for classifying our domain as "abusive use," as well as clarification on specific actions needed to remove all restrictions. Should any further technical or policy adjustments be required, we are ready to implement them immediately.

Furthermore, we ask you to kindly let us know what steps we must take to comply with your requirements and operate within the bounds of the law. If necessary, we can consider restricting access to our service within a particular country or region, or implementing region-specific functionality changes.

We remain prepared to address any misunderstandings in collaboration with you and will implement all necessary recommendations to ensure full compliance.

On Thu, Dec 12, 2024 at 1:47 AM Tilak, Karun (CAT) < Karun. Tilak@sfcityatty.org > wrote:

To Whom it May Concern,

You have been named as a Defendant in *People of the State of California v. Sol Ecom, Inc. et al.*, San Francisco Superior Court Case No. CGC-24-617237. The First Amended Complaint and Amended Summons in the case is attached.

Plaintiff People of the State of California hereby provide you notice that they will be filing an *ex parte* application for an extension of time to serve the complaint on all Defendants until February 17, 2025. The purpose of this motion is to give Plaintiff additional time to serve the complaint on all Defendants identified in the complaint. We plan to file our motion on December 13. Please let us know if you oppose our motion by 5:00 p.m. Pacific Time (PT) tomorrow, so we can indicate any opposition to the Court.

Sincerely,

Karun Tilak (he/him)

Deputy City Attorney

Office of City Attorney David Chiu



Phone: (415) 355-3308

Email: <u>karun.tilak@sfcityatty.org</u>

www.sfcityattorney.org





















cyril ivannik 𝕏

× i help build profitable CPA offers and affiliate programs for DTC brands × with sirka ×



SIRKA



Taras Shevchenko National University of Kyiv

New York, New York, United States • Contact info

5,521 followers - 500+ connections

Follow

Message

More

About

My expertise spans product field operations, encompassing product launches, branding, high-risk solutions, e-commerce, MIDS, CRM and CMS setups, marketing, and full-stack development. I specialize in taking offers or brands from concept to market-ready.... ...see more



Top skills

Product Launching • Product Owner • Supplement business • Nutra / Sweepstakes



Featured



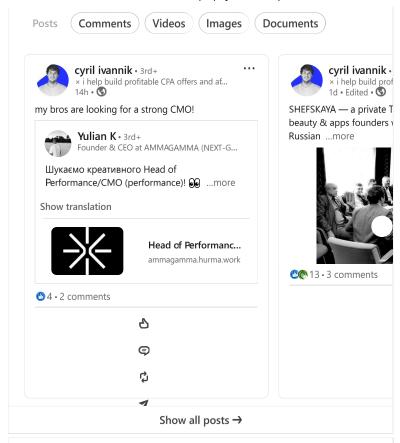
SHEFSKAYA — a private & beauty & apps found or Russian

We're launching a priva SHEFSKAYA, for Ukraini

C 13

Activity 5,521 followers

+ Follow



Experience



Co-Founder and CEO

SIRKA · Full-time

Dec 2023 - Present · 1 yr 6 mos

New York, New York, United States \cdot On-site

We help DTC brands in generating more sales through affiliate marketing worldwide.



Sirka CPA



Managing Partner

TraffCore · Full-time

Jul 2021 - Present · 3 yrs 11 mos

New York, United States

♥ Product Marketing, Lead Generation and +6 skills

Founder

Sol Amber Group \cdot Full-time

Oct 2016 - Present · 8 yrs 8 mos

Dubai, United Arab Emirates · On-site

Manufacturing of Amber Jewelry and Muslim Rosaries. Wholesale sales to GCC countries. Online sales of Muslim Prayer beads on Ebay, Etsy, Shopify...







Education



Taras Shevchenko National University of Kyiv Master of Business Administration - MBA, International Business



Международный Бизнес, Международный бизнес 2009 - 2014

Skills

Entrepreneurial Organizations





Marketing







Show all 4 details →

Show all 21 skills →

Recommendations

Received Given

Nothing to see for now

Recommendations that cyril receives will appear here.

Interests

Top Voices Companies Groups Newsletters Schools



Rishabh Jain 🛅

Co-Founder / CEO at FERMÀT - the leading commerce experience platform 11,239 followers

+ Follow



Eric Toda in

Director, Content Studio at Meta & Executive Director of Meta Prosper | Co-Author of 'What In The World Is Ezra's Art?' by Third State Books 26,643 followers

+ Follow

Show all Top Voices →

Join leaders from Netflix to Patreon shaping recurring commerce.





Less than 25 passes left at SubSummit 2025

Book Now

More profiles for you



marina jonathan · 3rd+

Looking for Nutra, Loan, Home, Dating offers. DM me if you have Direct offers and Weekly Payout

Message



Otari Arutiunian · 3rd+

Creating, launching and scaling brands @ Sirka

+ Follow



Marina A. · 3rd+

Affiliate Wanted! Dating Offers 30% CR Offers. Skype: live:517b66cea3c3b50 Telegram @Marina_BizDev

+ Follow



Andriy Romanyshyn · 3rd+

Looking for the quality traffic sources for our CPA/CPL/CPS.

Message



Ivan Lysiak · 3rd+

Affiliate Manager

Message

Show all

People you may know

From cyril's company

Abdul rehman Abdul rehman

-+ Connect



Roman Ustychenko 🕏

Full-Stack Developer

-+ Connect



Bohdana Nahrybetska

We help DTC brands in generating more sales through affiliate marketing worldwide | DM me on Telegram:@BohdanaNaa

+ Connect



Alexander Brodyanoy

We help DTC brands in generating more sales through affiliate marketing worldwide

+ Connect

Show all

You might like

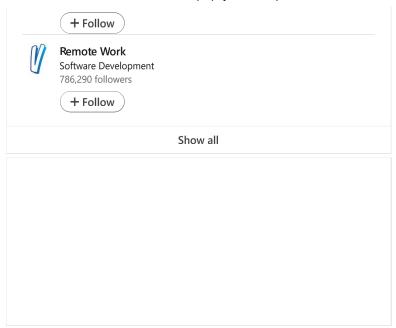
Pages for you



Work from Home / Remote Jobs

Human Resources Services

685,023 followers













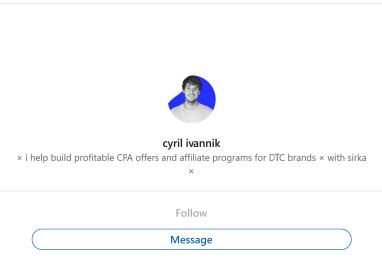


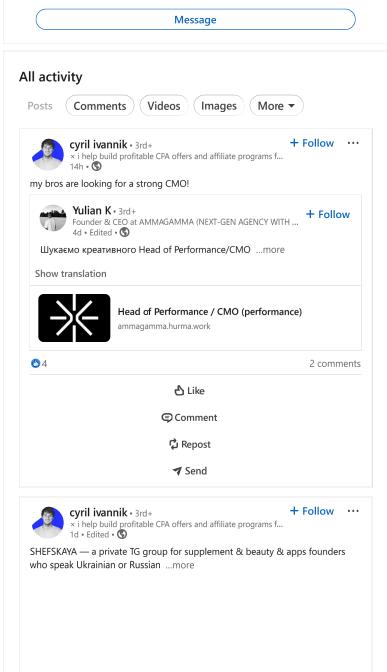


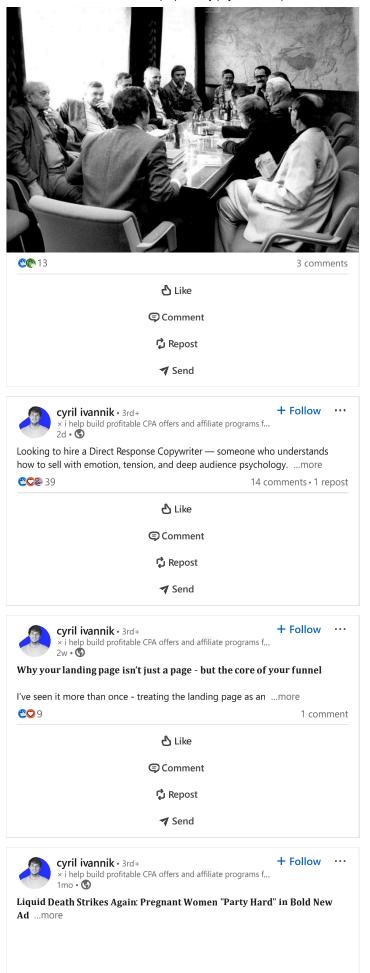




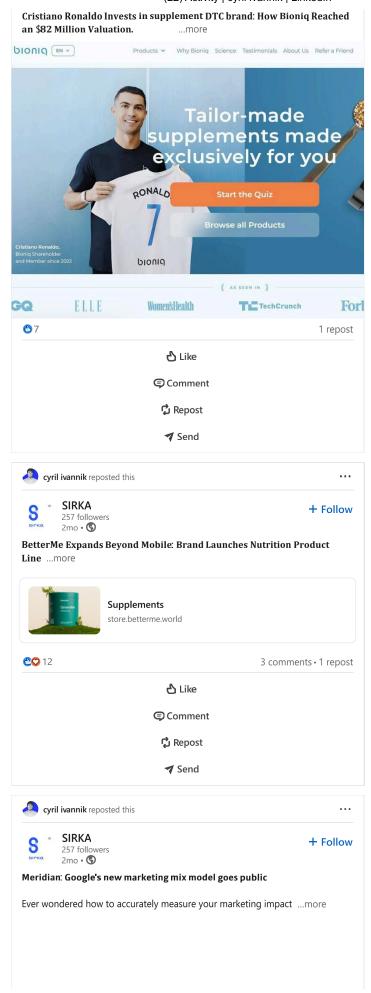


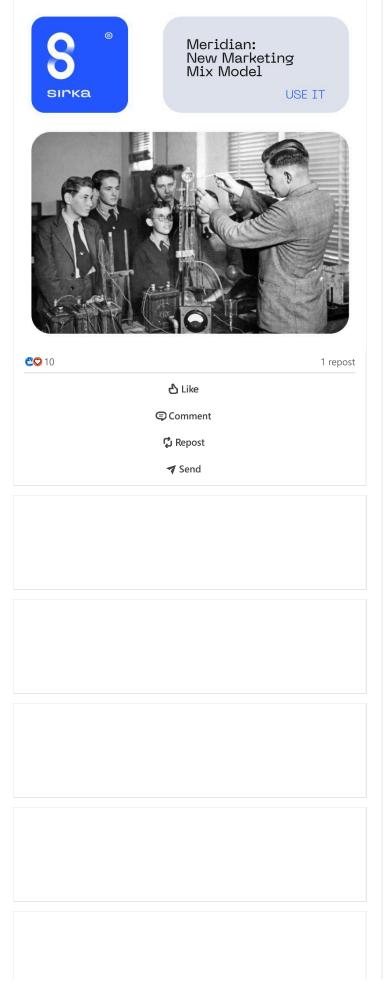




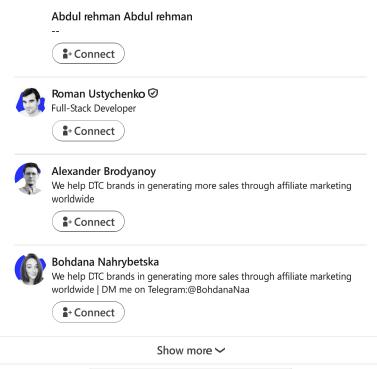


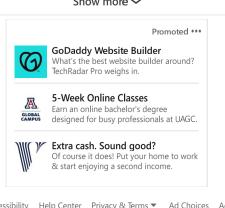






	Show more results
	Ad ··· Join leaders from Netflix to Patreon shaping
	recurring commerce.
	G SUB SUMMIT
	Less than 25 passes left at SubSummit 2025
	Book Now
_	eople you may know





About Accessibility Help Center Privacy & Terms ▼ Ad Choices Advertising

Business Services ▼ Get the LinkedIn app More

Linkedin Corporation © 2025

EXHIBIT 9

FILE COPY



OF A PRIVATE LIMITED COMPANY

Company Number 13463782

The Registrar of Companies for England and Wales, hereby certifies that

SOL AMBER GROUP LTD

is this day incorporated under the Companies Act 2006 as a private company, that the company is limited by shares, and the situation of its registered office is in England and Wales

Given at Companies House, Cardiff, on 18th June 2021



*N13463782I *







Application to register a company



Received for filing in Electronic Format on the: 16/06/2021

Company Name in

SOL AMBER GROUP LTD

full:

Company Type: Private company limited by shares

Situation of

England and Wales

Registered Office:

Proposed Registered

63-66 HATTON GARDEN

Office Address: LONDON

ENGLAND EC1N 8LE

Sic Codes: 46900

46190

I wish to entirely adopt the following model articles:

Private (Ltd by Shares)

Proposed Officers

Company Director 1

Type: Person

Full Forename(s): MR KYRYLO

Surname: IVANNYK

Former Names:

Service Address: recorded as Company's registered office

Country/State Usually U

Resident:

UKRAINE

Date of Birth: **/12/1991 Nationality: UKRAINIAN

Occupation: BUSINESS PERSON

The subscribers confirm that the person named has consented to act as a director.

Statement of Capital (Share Capital)

Class of Shares: ORDINARY Number allotted 100
Currency: GBP Aggregate nominal value: 100

Prescribed particulars

FULL RIGHTS REGARDING VOTING, PAYMENT OF DIVIDENDS AND DISTRIBUTIONS

Statement of Capital (Totals)			
Currency:	GBP	Total number of shares:	100
•		Total aggregate nominal value:	100
		Total aggregate unpaid:	0

Initial Shareholdings

Name: KYRYLO IVANNYK

Class of Shares: Address **63-66 HATTON GARDEN ORDINARY**

LONDON

Number of shares: **ENGLAND** 100 Currency: EC1N 8LE **GBP** 1

Nominal value of each

share:

Amount unpaid: 0 Amount paid: 1

Persons with Significant Control (PSC) Statement of initial significant control On incorporation, there will be someone who will count as a Person with Significant Control (either a registerable person or relevant legal entity (RLE)) in relation to the company **Electronically filed document for Company Number:** 13463782

Individual Person with Significant Control details

Names:	MR KYRYLO IVANNYK
Country/State Usually Resident:	UKRAINE
Date of Birth: **/12/199	Nationality: UKRAINIAN
Service address recorded as	Company's registered office
	t each person named as an individual PSC in this application knows that their ed as part of this application.

Nature of control The person holds, directly or indirectly, 75% or more of the voting rights in the company. Nature of control The person holds, directly or indirectly, 75% or more of the shares in the company. The person has the right, directly or indirectly, to appoint or Nature of control remove a majority of the board of directors of the company.

Statement of Compliance

I confirm the requirements of the Companies Act 2006 as to registration have been complied with.

Name: KYRYLO IVANNYK

Authenticated YES

Authorisation

Authoriser Designation: subscriber Authenticated YES

COMPANY HAVING A SHARE CAPITAL

Memorandum of Association of SOL AMBER GROUP LTD

Each subscriber to this memorandum of association wishes to form a company under the Companies Act 2006 and agrees to become a member of the company and to take at least one share.

Name of each subscriber	Authentication
KYRYLO IVANNYK	Authenticated Electronically

Dated: 16/06/2021

EXHIBIT 10



HOME

ABOUT US

SERVICES

CASES

BLOG

CONTACTS

LET'S

Experienced CPA Agency

ABOUT SIRKA



LET'S LAUNCH

Hyperboost your brand sales with affiliate program



TRAFFIC CHANNELS 20+

PARTNERSHIPS 50+ AFFILIATES 1000+

ABOUT

We create affililate marketing opportunities for DTC brands worldwide

With vast experience in affiliate marketing and ecommerce, we've collaborated with global brands and successfully operated our own. Boasting our proprietary affiliate network, our expertise has been honed through real-world practice.

Strategically positioned in NYC, our dedicated team focuses on partnerships and results. We're not just marketers; we're your partners in driving unparalleled growth and pushing boundaries in the digital space. Join us in our relentless pursuit of excellence. Because your brand deserves more sales.

CONNECT WITH US

LINKEDIN INSTAGRAM

OUR TEAM

https://s-i-r-k-a.com/about/





















CAREER

Want to be part of our team?

JOIN OUR TEAM

Unparalleled Growth & Experience

Dive into a wealth of learning opportunities with us. At our agency, every project is a chance to grow, and every challenge is a new lesson.

O2 Global Synergy & Connections

As a member of our globally distributed team spanning multiple time zones, embrace the essence of worldwide collaboration and form invaluable global connections.

03 Remote Work

We are a distributed team from 5 different time zones so we know how important freedom is for our team members

Unique Agency Perspective

Our one-of-a-kind approach ensures that your work stands out. Experience the nuances of the affiliate and ecommerce worlds like never before. Join us and be a part of this unique journey.

CONTACT

Let's boost your brand sales now!

GET IN TOUCH

https://s-i-r-k-a.com/about/



LINKEDIN

INSTAGRAM

REVIEWED ON

REVIEW US

PAGES	SIRKA AGENCY
HOME	WE ARE SIRKA – A RESULTS DRIVEN
ABOUT US	CPA AGENCY THAT
SERVICES	HELPS D2C BRANDS RAISE
BLOG	VALUE BY SCALING SALES THROUGH
	AFFILIATE
	MARKETING
CONTACT US	

SOL ECOM INC 3301 NE 1ST AVE UNIT 302 MIAMI, FL 33137

https://s-i-r-k-a.com/about/

HOME ABOUT SERVICES CASES BLOG CONTACTS LET'S

CONTACT US

Let's start your project



+++ WE'LL HELP YOU BOOST SALES THROUGH AFFILIATE MARKETING +++

FOLLOW US ON LINKEDIN

INSTAGRAM

https://s-i-r-k-a.com/contact/

powered by Calendly



Cyril Ivannik | s-i-r-k-a.com

Sirka × Client



30 min

FAQ



Company	/	Brand
name		

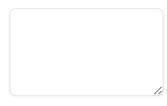
Website

Your Name *

Email *

\searrow

Message *



Submit

Made with **Fillout**

How does the CPA model benefit my brand compared to traditional advertising?

5/26/25, 4:38 PM

SIRKA - contacts

What is the minimum monthly revenue or budget required to be a Sirka client?

How much do Sirka's services cost?

How quickly can we start implementing an affiliate program for our brand?

OUR COMPANY

Sol Ecom Inc 3301 NE 1ST AVE Unit

302 MIAMI, FL 33137

https://s-i-r-k-a.com/contact/

GET IN TOUCH



LINKEDIN

INSTAGRAM

PAGES SIRKA AGENCY

HOME

ABOUT US

SERVICES

BLOG

CONTACT

WE ARE
SIRKA – A
RESULTS
DRIVEN
CPA
AGENCY
THAT

HELPS D2C
BRANDS
RAISE
VALUE BY
SCALING
SALES
THROUGH
AFFILIATE
MARKETING

SOL ECOM INC 3301 NE 1ST

AVE UNIT 302 MIAMI, FL 33137