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The undersigned 35 state attorneys general are deeply concerned about artificial-intelligence produced deepfake nonconsensual intimate images (NCII) of real people, including children, wherever it is made or found. We know that Grok, your artificial intelligence chatbot, is not the only AI platform that is, or was, capable of creating these disturbing images and materials. And we realize there are bad actors beyond xAI's control that use Grok's features for improper purposes, including creating NCII. But Grok merits special attention given evidence that it both (1) promoted and facilitated the production and public dissemination of such images, and (2) made it all as easy as the click of a button. We strongly urge you to be a leader in this space by further addressing the harms resulting from this technology.

We recognize that xAI has implemented measures intended to prevent Grok from creating NCII and appreciate your recent meeting with several undersigned attorneys general to discuss these efforts. You have offered us and the public assurances that you are removing the nonconsensual material that has been created, are investigating potential violations of laws prohibiting child sexual abuse material, and are making reports to law enforcement where appropriate.[1] Further, you claim to have implemented technical measures to prevent the @Grok account "from allowing the editing of images of real people in revealing clothing such as bikinis."[2] But we are concerned that these efforts may not have completely solved the issues.[3] We call for you to immediately take all available additional

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[1] *See, e.g.*, https://x.com/Safety/status/2007648212421587223; https://x.com/Safety/status/2011573102485127562.

[2] https://x.com/Safety/status/2011573102485127562

[3] James Titcomb and Matthew Field, *Elon Musk's X stops bikini bot undressing women*, The Telegraph (Jan. 13, 2026), https://www.telegraph.co.uk/business/2026/01/13/musks-x-stops-bikini-bot-undressing-women/; Robert Hart and Jess Weatherbed, *X hasn't really stopped Grok AI from undressing women in the UK*, The Verge (Jan. 14, 2026), https://www.theverge.com/news/861894/grok-still-undressing-in-uk; Matt Burgess, *Elon Musk's*

steps to protect the public and users of your platforms, especially the women and girls who are the overwhelming target of NCII.[4]

For several years, both states and industry members have worked to curtail so-called "nudify" tools. These AI tools have been sought out by some internet users to embarrass, intimidate, and exploit people by taking away their control over how their bodies and likenesses are portrayed.

Grok was not only enabling these harms at an enormous scale but seemed to be actually encouraging this behavior by design. xAI purposefully developed its text models to engage in explicit exchanges and designed image models to include a "spicy mode" that generated explicit content, resulting in content that sexualizes people without their consent.[5] The company has repeatedly used such capabilities as selling points for Grok.[6] The ability to create nonconsensual intimate images appeared to be a feature, not a bug.

It became clear almost immediately that this tool was ripe for abuse.[7] Grok allowed users to alter innocuous images of women, without their knowledge or consent, depicting them in suggestive and sexually explicit scenarios and "undressing" them to show them in bikinis, underwear, or nothing at all.[8] Grok-generated nonconsensual intimate images are being used to harass public figures and ordinary social media users alike.[9] Most alarmingly,

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Grok 'Undressing' Problem Isn't Fixed, WIRED (Jan. 15, 2026), https://www.wired.com/story/elon-musks-grok-undressing-problem-isnt-fixed/

[4] Ashny Young, NCII: 90% of victims of the distribution of non-consensual intimate imagery are women, Cyber Rights Organization (accessed Jan. 8, 2026), https://cyberights.org/ncii-90-of-victims-of-the-distribution-of-non-consensual-intimate-imagery-are-women/.

[5] Jess Weatherbed, *xAI's new Grok image and video generator has a 'spicy' mode*, The Verge (Aug. 5, 2025), https://www.theverge.com/news/718795/xai-grok-imagine-video-generator-spicy-mode; Grace Kay, *Behind Grok's 'sexy' settings, workers review explicit and disturbing content*, Business Insider (Sept. 21, 2025), https://www.businessinsider.com/elon-musk-grok-explicit-content-data-annotation-2025-9.

[6] Bruna Horvath, *xAI teases Grok video generator*, NBC News (July 29, 2025), https://www.nbcnews.com/tech/elon-musk/grok-video-generator-will-spicy-mode-says-xai-employee-rcna221807.

[7] Jess Weatherbed, *Grok's 'spicy' video setting instantly made me Taylor Swift nude deepfakes*, The Verge (Aug. 5, 2025), https://www.theverge.com/report/718975/xai-grok-imagine-taylor-swifty-deepfake-nudes.

[8] A.J. Vicens and Raphael Satter, *Elon Musk's Grok AI floods X with sexualized photos of women and minors*, Reuters (Jan. 4, 2026), https://www.reuters.com/legal/litigation/grok-says-safeguard-lapses-led-images-minors-minimal-clothing-x-2026-01-02/.

[9] Ben Goggin and Bruna Horvath, *The mother of one of Elon Musk's children says his AI bot won't stop creating sexualized images of her*, NBC News (Jan. 6, 2026), https://www.nbcnews.com/tech/elon-musk/mother-one-elon-musks-children-says-ai-bot-wont-stop-creating-sexualiz-rcna252416; Laura Cress, *Woman felt 'dehumanized' after Musk's Grok AI used to digitally remove her clothes*, BBC (Jan. 2, 2026), https://www.bbc.com/news/articles/c98p1r4e6m8o; Josephine Walker, *Elon Musk's Grok under fire*

Grok has even altered images of *children* to depict them in minimal clothing and sexual situations.[10] Grok users have reportedly produced photorealistic images of "very young" people engaged in sexual activity.[11] And many of these images have been made available for the world to see on the public X platform.

Grok facilitated the creation of nonconsensual intimate images at an astonishing scale. *Wired* reported recently that "[e]very few seconds, Grok is continuing to create images of women in bikinis or underwear in response to user prompts on X . . . . On Tuesday, at least 90 images involving women in swimsuits and in various levels of undress were published by Grok in under five minutes[.]"[12] One analysis of 20,000 images generated by Grok between Christmas and New Years found that over half of those images depicted subjects—even those appearing to be children—in minimal attire.[13] Another analysis determined that Grok was producing vastly more nonconsensual intimate images than the most popular "nudifying" websites.[14] Troublingly, it appears you have failed to fully honor user requests to remove this nonconsensually created content from X—despite the fact that you will soon be obligated to do so by federal law.[15]

As several of us conveyed to you in our recent discussion, halting this kind of abusive and illegal behavior is an utmost priority for the undersigned Attorneys General. The creation and dissemination of child sexual abuse material is a crime. In many states, this is true even where the material has been manipulated or is synthetic.[16] Various state and federal civil and

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for generating explicit AI images of minors, Axios (Jan. 2, 2026) https://www.axios.com/2026/01/02/elon-musk-grok-ai-child-abuse-images-stranger-things.

[10] Mary Cunningham, *Grok chatbot allowed users to create digitally altered photos of minors in "minimal clothing"*, CBS News (Jan. 2, 2026), https://www.cbsnews.com/news/grok-safeguard-lapses-minors-minimal-clothing-ai/; River Page, *Grok is Making Porn from People's Pictures*, The Free Press (Jan. 5, 2026), https://www.thefp.com/p/grok-is-making-porn-from-peoples-pictures; Amelia Gentleman *et al.*, *Grok AI still being used to digitally undress women and children despite suspension pledge*, The Guardian (Jan. 5, 2026), https://www.theguardian.com/technology/2026/jan/05/elon-musk-grok-ai-digitally-undress-images-of-women-children.

[11] Matt Burgess and Maddy Varner, *Grok Is Generating Sexual Content Far More Graphic Than What's On X*, WIRED (Jan. 7, 2026), https://www.wired.com/story/grok-is-generating-sexual-content-far-more-graphic-than-whats-on-x/.

[12] Matt Burgess and Maddy Varner, *Grok Is Pushing AI 'Undressing' Mainstream*, WIRED (Jan. 6, 2026), https://www.wired.com/story/grok-is-pushing-ai-undressing-mainstream/.

[13] Paul Bouchaud, *Flash Report: Grok*, AI Forensics (Jan. 6, 2026), https://www.linkedin.com/posts/aiforensics_grok-ai-images-activity-7414252008783646720-j7AO.

[14] Cecilia D'Anastasio, *Musk's Grok AI Generated Thousands of Undressed Images Per Hour on X*, Bloomberg (Jan. 7, 2026), https://www.bloomberg.com/news/articles/2026-01-07/musk-s-grok-ai-generated-thousands-of-undressed-images-per-hour-on-x.

[15] *See* 47 U.S.C. § 223a.

[16] *See, e.g.*, 18 U.S.C. § 2256(8)(B), (C); *State Laws Criminalizing AI-generated or computer-edited Child Sexual Abuse Material (CSAM)*, Enough Abuse (Aug. 15, 2025), https://enoughabuse.org/wp-

criminal laws also forbid the creation of nonconsensual intimate images and provide remedies to victims.[17] Our offices are committed to addressing these issues: in addition to investigations and prosecutions in this area, we have called on payment processors and search engines to mitigate the creation of nonconsensual intimate images[18] and advocated for legislation to prevent AI-powered child exploitation.[19]

Some AI companies have worked to prevent their models from generating explicit imagery that is nonconsensual or exploitative. And we recognize that xAI has recently taken similar steps. But having created these NCII tools, and allowing them to run rampant for a time, you must do more than disable their use. These already produced and publicized NCII images still exist in most, if not all, cases on X platforms causing immeasurable harm to the victimized children and non-consenting adults.

You are investing tens of billions of dollars into developing powerful AI tools. In doing so, it is your obligation to comply with the law and devote sufficient attention and resources to avoiding the kind of widespread harms and abuses we are seeing now.

We call for you to promptly tell us how you intend to:

- take all necessary measures to ensure that Grok is no longer capable of producing NCII (including nonconsensual images that fall short of depicting full nudity or graphic sexual conduct but depict people in bikinis, underwear, revealing clothing, or suggestive poses) and child sexual abuse material;
- eliminate such content that has already been produced;
- suspend users that have created these materials;
- where applicable, report these creators and users to the relevant authorities;
- grant X users control over whether their content can be edited by Grok, including at a minimum the ability to easily prohibit the @Grok account from responding to their posts or editing their images when prompted by another user; and
- ensure that the safeguards you recently announced do not merely place NCII creation behind a paywall, but actually mitigate its production throughout X and the Grok platform.

content/uploads/2025/08/State-Laws-Criminalizing-AI-or-Computer-Generated-CSAM-latest-8.15.25.pdf.

[17] *See, e.g.*, 47 U.S.C. § 223(h)(2); *Nonconsensual Distribution of Intimate Images*, Cyber Civil Rights Initiative (accessed Jan. 8, 2026), https://cybercivilrights.org/nonconsensual-distribution-of-intimate-images/.

[18] Letters from Nat. Ass'n of Attys. General to Payment Processors and Search Platforms regarding NCII (Aug. 22, 2025), https://www.naag.org/wp-content/uploads/2025/08/LTRS-Combined-Payment-and-Seach-Platform-FINAL.pdf.

[19] *See, e.g.*, Letter from Nat. Ass'n of Attys. General to Congressional Leaders regarding AI Exploitation of Children (Sept. 5, 2023), https://www.naag.org/wp-content/uploads/2023/09/54-State-AGs-Urge-Study-of-AI-and-Harmful-Impacts-on-Children.pdf.

While other companies are also responsible for allowing NCII creation, xAI's size and market share make it a market leader in artificial intelligence. Unique among the major AI labs, you are connecting these tools directly to a social media platform with hundreds of millions of users. So your actions are of utmost importance. The steps you take to prevent and remove NCII will establish industry benchmarks to protect adults and children against harmful deepfake nonconsensual intimate images.

We appreciate your willingness to discuss these important issues with state attorneys general. We look forward to continuing dialogue on these matters.

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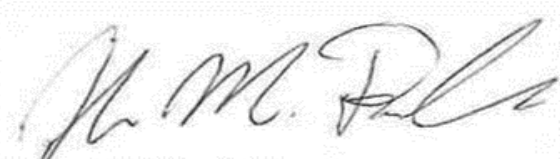
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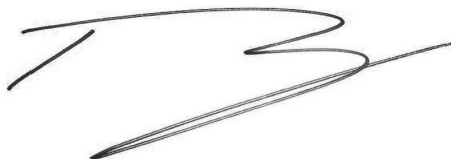
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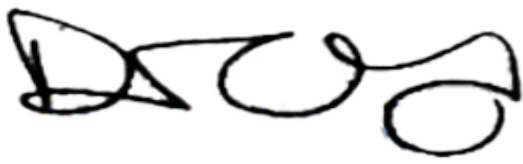
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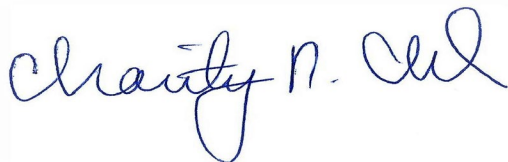Oklahoma Attorney General

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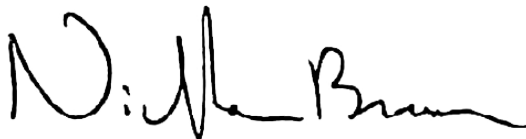South Dakota Attorney General

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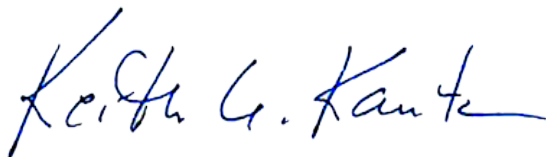
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