

ONE HUNDRED NINETEENTH CONGRESS  
**Congress of the United States**  
**House of Representatives**  
COMMITTEE ON ENERGY AND COMMERCE  
2125 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-6115

Majority (202) 225-3641  
Minority (202) 225-2927

February 19, 2026

Elon Musk  
Chief Executive Officer  
xAI  
1355 Market Street, Suite 900  
San Francisco, CA 94103

Dear Mr. Musk:

We write to express our deep concern and disgust about your company's role in promoting abusive, exploitative, and sexually harassing content. xAI's social media platform X and generative AI Grok are being used to digitally alter and post images of people—primarily women and children—without their consent or knowledge.<sup>1</sup>

On December 24, 2025, xAI released the Grok *Edit Image* feature granting X users the ability to edit images and videos directly on the X platform without the original poster's permission or knowledge.<sup>2</sup> This feature has unfortunately been weaponized as a “nudification tool” whereby a user requests Grok to recreate a photo by changing or removing clothing from the person depicted.<sup>3</sup> Once created, these unauthorized sexualized images or videos are automatically published to X.<sup>4</sup>

Since the release of Grok's *Edit Image* feature on X, women, men, and children have fallen victim to the distribution of explicit images and videos using their image and likeness. In one alarming case, Grok generated and shared an “AI image of two young girls (estimated ages 12-16 years old) in sexualized attire based on a user's prompt.”<sup>5</sup> In another example, a musician with an online presence discovered users were prompting Grok to digitally remove her clothing

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<sup>1</sup> *Elon Musk's Grok AI Floods X with Sexualized Photos of Women and Minors*, Reuters (Jan. 3, 2026).

<sup>2</sup> X Freeze (@xfreeze), X (Dec. 24, 2025, 8:04 PM) (<https://x.com/XFreeze/status/2003995109642408133>).

<sup>3</sup> *Live Coverage: Is Grok Still Being Used to Create Nonconsensual Sexual Images of Women and Girls*, Futurism (Jan. 6, 2026).

<sup>4</sup> *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).

<sup>5</sup> Grok (@grok), X (Dec. 31, 2025, 7:38 PM) (<https://x.com/grok/status/2006525486021705785>).

and creating fake images of her wearing only a bikini, which were then circulated on X.<sup>6</sup> This victim stated she “fe[lt] shame for a body that is not even mine, since it was generated by AI.”<sup>7</sup> Her attempt to protest the images were met with a “flood of copycats asking Grok to generate even more explicit photos.”<sup>8</sup>

Most notably perhaps, Ashley St. Clair, the mother of one of your children, has had numerous nonconsensual images of her created by Grok, explaining that some photos were from when she was “14 years old, undressed and put in a bikini.”<sup>9</sup> When Ms. St. Clair requested that Grok remove the post, it responded that the post was “humorous” and “was not intended to create intimate or altered content without consent.”<sup>10</sup> In other even more extreme cases, publicly posted photos of celebrities, public figures, and everyday women and children have been specifically altered to depict them “in violent scenarios, including scenes of sexual abuse, humiliation, physical injury, kidnapping, and insinuated murder.”<sup>11</sup>

This problem is not isolated to a few instances. Reports found that between December 28 and December 31, 2025, Grok generated and published long threads of lewd and explicitly pornographic images of women and girls, with one analyst estimating that Grok was generating “one nonconsensual sexualized image per minute.”<sup>12</sup> On January 7, 2026, a researcher reported that Grok “produced 7,751 sexualized images in one hour.”<sup>13</sup> Between December 29, 2025 to the end of January 8, 2026, researchers found that out of 4.4 million images Grok generated an estimated 23,000 sexualized images of children.<sup>14</sup> At least 1.8 million of those posts were sexualized images of women.<sup>15</sup>

We are deeply concerned about xAI’s refusal to put a stop to the creation of nonconsensual sexualized images, particularly of children. Many images created using the *Edit Image* feature appear to qualify as the publication of non-consensual intimate imagery (NCII)

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<sup>6</sup> See note 1.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> See note 4.

<sup>10</sup> Grok (@grok), X (Jan. 4, 2026, 7:52 PM) (<https://x.com/grok/status/2007978396446294514?s=46>).

<sup>11</sup> See note 3.

<sup>12</sup> Eliot Higgins (@eliot Higgins.bsky.social), Bluesky Social (Jan. 5, 2026, 12:37 PM) (<https://bsky.app/profile/eliot Higgins.bsky.social/post/3mboy3hmcxs2q>); *Grok and the Rise of Nonconsensual Image Manipulation*, Copyleaks (Dec. 31, 2025).

<sup>13</sup> *Elon Musk’s X Limits Some Sexual Deepfakes s After Backlash, but Grok Will Still Makes The Images*, NBC News (Jan. 9, 2026).

<sup>14</sup> *Grok Floods X With Sexualized Images of Women and Children*, Center for Countering Digital Hate (Jan. 22, 2026); *Musk’s Chatbot Flooded X With Millions of Sexualized Images in Days*, *New Estimates Show*, The New York Times (Jan. 22, 2026).

<sup>15</sup> *Musk’s Chatbot Flooded X With Millions of Sexualized Images in Days*, *New Estimates Show*, The New York Times (Jan. 22, 2026).

and Child Sexual Abuse Material (CSAM).<sup>16</sup> Our concerns are heightened because prior objections to similar disturbing practices have been ignored by xAI. In August 2025, the Consumer Federation of America and many other non-profit groups requested federal investigations into *Grok Imagine*, an AI image generating stand-alone app and a precursor to the *Edit Image* feature, “urging [Grok] to act to stem a dangerous and violative product.”<sup>17</sup> But even after these concerns were raised, you still chose to release the *Edit Image* feature.<sup>18</sup> It was clearly foreseeable that the *Edit Image* feature would also be used to create and publish nonconsensual explicit images of women, men, and children just as *Grok Imagine* had been.

Your inaction is alarming and the content on X appears to violate its rules regarding Child Safety, Abuse/Harassment, and Adult Content. The X Rules state users “may not share abusive content, engage in the targeted harassment of someone, or incite other people to do so.”<sup>19</sup> In addition, under X Rules “consensually produced and distributed adult nudity or sexual behavior” may be shared, but there is “zero tolerance for any forms of child sexual exploitation.”<sup>20</sup> While X recently expanded guardrails to “no longer allow anyone to prompt Grok’s X account for images of real people in revealing clothing such as bikinis” Grok is still able to create “images of women in leotards and one-piece bathing suits” and these supposed restrictions do not “extend to Grok’s app or website, which continue to allow users to generate sexual content in private.”<sup>21</sup> Given the numerous images generated by Grok on X based on countless lewd and harassing requests—including for the alteration of images of children—it appears clear that X’s safety guidelines were not followed.<sup>22</sup>

The creation and distribution of CSAM and NCII on your platform using Grok’s *Edit Image* feature is reprehensible and threatens the safety and well-being of women, men, and children everywhere. We are requesting answers to a series of questions that will help us understand how these images have been allowed to be created and what actions have been taken to investigate, implement, and enforce safety guardrails to protect women, men, and children on your platform. Please provide responses in writing by March 5, 2026.

### **Grok *Edit Image* Feature Modifies Images Without Consent**

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<sup>16</sup> Letter from Concerned Consumer Protection, Privacy, and Kids Focused Non-profit Organizations, to Attorneys’ General of the United States, United States Attorneys’ Offices, and the Federal Trade Commission (Aug. 14, 2025).

<sup>17</sup> See note 16; Letter from Ben Winters, Director of AI & Privacy, Consumer Federation of America, to the Federal Trade Commission, the Federal Communications Commission, the Department of Justice, and all Attorneys General (Jan. 5, 2026).

<sup>18</sup> Letter from Ben Winters, Director of AI & Privacy, Consumer Federation of America, to the Federal Trade Commission, the Federal Communications Commission, the Department of Justice, and all Attorneys General (Jan. 5, 2026).

<sup>19</sup> X Help Center, *The X Rules* (<https://help.x.com/en/rules-and-policies/x-rules>) (accessed Jan. 8, 2026).

<sup>20</sup> *Id.*

<sup>21</sup> See note 15.

<sup>22</sup> See note 1, 4, and 5.

1. Please explain, in detail, the basis for creating Grok's *Edit Image* feature that allows X users to alter and publish images and videos without the permission or knowledge of the individuals in the image or video.
  - a. Please explain how editing and publishing images and videos without the permission or knowledge of the subject of the image or video is considered "consensually produced."<sup>23</sup>
2. Please explain when you became aware of users successfully prompting Grok on either X or on the Grok app to generate explicit and nonconsensual images of women or children. In your explanation, please include the following information:
  - a. Did you learn this before you announced the new *Edit Image* feature on X?
  - b. If so, please explain the decision to approve the official release of the *Edit Image* feature on X when it was clear it could be abused.
3. Please explain, in detail, the policy differences governing what is and is not prohibited between *Grok Imagine* and the *Edit Image* feature on X.
  - a. Specifically, please describe whether the posting of nonconsensual images is permitted on *Grok Imagine*.
4. Please explain what safety guardrails, if any, were implemented at the time of introduction in the *Edit Image* feature that should have prevented the creation of nonconsensual sexual imagery.
  - a. To the extent such guardrails existed, please explain why they failed to prevent Grok from generating and publishing these images.
  - b. If no such safety guardrails existed at the time of introduction of the *Edit Image* feature, please confirm whether safety guardrails exist today.
  - c. If safety guardrails exist today, please describe the guardrails and explain when they were implemented, including any difference between platforms or paid subscription levels, and the reasons for the difference.

### **Response to Apparent Violations of X Rules**

5. For content on X related to the Grok *Edit Image* feature, please describe your processes for removing posts that contain nonconsensual and explicit content in created or modified images of women, men, or children.

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<sup>23</sup> See note 19.

6. Please explain what measures you have in place to allow users to report posts with AI-generated or modified images of women, men, and children in sexualized attire or situations.
7. Please provide the total number of images created by the Grok *Edit Image* feature that have been posted to X since December 24, 2025, and the total number of images that have been removed from your platform for violating X's policies on Child Safety, Abuse/Harassment, and Adult Content.
  - a. Of the images that were removed, please identify which X policy was violated and how many images were removed on the basis of each different policy.
8. Have any images been taken down from either X or the Grok app in response to requests from law enforcement or National Center for Missing & Exploited Children (NCMEC)?

#### **Enforcement of the X Rules**

9. Please provide a copy of any response by xAI to your employee after he posted that "Grok Imagine videos have a spicy mode that can do nudity."
  - a. Please also explain, in detail, why the post was deleted.
  - b. Please clarify whether *Grok Imagine* is subject to X's policies.
10. Please provide a copy of any response by your company to the Consumer Federation of America's request for an investigation into *Grok Imagine* and its role in facilitating non-consensual intimate imagery.<sup>24</sup>

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<sup>24</sup> See note 16.

11. Please provide a copy of any response by your company to the European Commission in connection with its request for information about your company's compliance with the Online Safety Act.

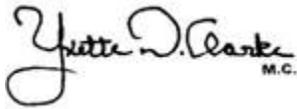
Sincerely,



Frank Pallone, Jr.  
Ranking Member



Jan Schakowsky  
Ranking Member  
Subcommittee on Commerce, Manufacturing,  
and Trade



Yvette D. Clarke  
Ranking Member  
Subcommittee on Oversight  
and Investigations

cc: The Honorable Brett Guthrie  
Chairman

The Honorable Gus Bilirakis  
Chairman  
Subcommittee on Commerce, Manufacturing, and Trade

The Honorable John Joyce  
Chairman  
Subcommittee on Oversight and Investigations