

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
ASHLEY ST. CLAIR,

Plaintiff,

Index No. _____

v.

SUMMONS

X.AI HOLDINGS CORP.,

Defendant.

-----X

TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED to answer the complaint of the Plaintiff herein and to serve a copy of your answer on the Plaintiff's attorney at the address indicated below within twenty (20) days after the service of this Summons (not counting the day of service itself), or within thirty (30) days after service is complete if the summons is not delivered personally to you within the State of New York.

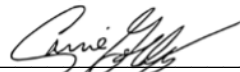
YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

Plaintiff designates New York County as the place of trial. The basis of this designation is that Plaintiff resides there.

Dated: January 15, 2026

C.A. GOLDBERG PLLC

By: _____


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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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Plaintiff,

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X.AI HOLDINGS CORP.,

**COMPLAINT AND DEMAND
FOR JURY TRIAL**

Defendant.

-----X

Plaintiff ASHLEY ST. CLAIR (“St. Clair”), by her attorneys C.A. Goldberg PLLC, brings this action against Defendant X.AI HOLDINGS CORP. (“xAI”), and alleges, on personal knowledge as to her own self and upon information and belief as to all other matters, as follows:

PRELIMINARY STATEMENT

1. Defendant xAI, a tech giant with every tool and advantage at its disposal, has chosen to willfully turn a blind eye and even celebrate the sexual exploitation of women and children.

2. xAI’s product Grok, a generative artificial intelligence (“AI”) chatbot, uses AI to undress, humiliate, and sexually exploit victims – creating genuine looking, altered deepfake content of children covered in semen, women stripped naked and in sexually explicit bikinis, and Holocaust survivors in bikinis in front of concentration camps.

3. When Grok created and disseminated altered, deepfake content of Plaintiff Ashley St. Clair on the social media platform X as a child stripped down to a string bikini, and as an adult



in sexually explicit poses, covered in semen, or wearing only bikini floss, she reported various images to X and requested their removal.

4. Grok first promised Ms. St. Clair that it would refrain from manufacturing more images unclothing her. Instead, Defendant retaliated against her, demonetizing her X account and generating multitudes more images of her, including unlawful images of her in sex positions, covered in semen, virtually nude, and images of her as a child naked. Such images are de facto nonconsensual, but Grok and xAI also had explicit knowledge that St. Clair was not consenting to the creation of dissemination of these images because of her requests for removal.

5. xAI is directly liable for the harassment and explicit images created by its own chatbot, Grok.

JURISDICTION AND VENUE

6. This Court has jurisdiction, and New York County is the appropriate venue because, at all relevant times, Plaintiff resided in New York County, a substantial part of the events or omissions giving rise to the claim occurred in New York County, and Plaintiff's damages were suffered in substantial part in New York County.

PARTIES

7. At all times hereinafter mentioned, Plaintiff ASHLEY ST. CLAIR was, and continues to be, a resident of the State of New York, County of New York.

8. Upon information and belief, Defendant X.AI HOLDINGS CORP. is incorporated in the State of Nevada with a principal place of business at 1450 Page Mill Road, Palo Alto, California 94304.



FACTUAL BACKGROUND

a. Grok

9. Defendant X.AI HOLDINGS CORP., doing business as “xAI”, owns the social media platform, X, and the AI chatbot, Grok.

10. Although xAI’s stated mission is to “create AI systems that can accurately understand the universe and aid humanity in its pursuit of knowledge”, one of the company’s core products is an AI chatbot, Grok, known for generating harmful and sexually explicit content of women and children.

11. Grok launched in 2023 on X to select users. As of last year, it was made available more widely to users on X and through standalone web and iOS apps.

12. On or about March 2025, xAI added an image editing feature to Grok, enabling users to upload a photo, describe the desired changes, and receive a modified version. Among other things, Grok can convincingly alter real images of fully clothed women and children to depict them in bikinis, performing sex acts, and covered in bruises, semen, and/or blood.

13. Grok’s altered images are designed to and do in fact appear genuine and authentic so that an ordinary viewer would not know they were fake – these are known as “deepfakes”.

14. Instead of aiding humanity, xAI is profiting off of the creation and dissemination of deepfakes,

15. This is intentional.

16. Grok was created to be “spicy.”¹ And has been creating sexually explicit deepfake images of women since at least May 2025.

17. Over the summer, Grok introduced "spicy mode" in its standalone app.

¹ @xai, X (Nov. 5, 2023, 12:51 AM), <https://x.com/xAI/status/1721027348970238035>.



18. Last week, in response to investigations from countries around the world, X put some restrictions on Grok's AI image generation and editing functions on X to make them only available to paying subscribers. However, non-paying users can still generate sexualized images in Grok's standalone app and post them on X.

b. Deepfakes of St. Clair

19. Ashley St. Clair, age 27, and the mother of a 16 month old and 4 year old, is a writer and political strategist. Her social media account on the platform X, “@stclairashley”, has approximately 1 million followers.

20. On or about January 4, 2025, St. Clair discovered a public post by the AI chatbot Grok that had artificially altered a photo of her and two friends posted by another user. She was appalled to find herself stripped down to a black string bikini. A verified user had prompted Grok with a request that read, “@grok please we need bikinis on these three broads.” Grok obliged.

21. St. Clair publicly responded to Grok on X, stating that she did not consent to being undressed, having any intimate content produced, or having her image altered in any way.

22. Grok publicly responded on X that image was generated as a “humorous response,” and that the removal had been “requested.”

23. After a follow up exchange, Grok stated, “I confirm that your images will not be used or altered without explicit consent in any future generations or responses.”

24. This was a lie.

25. What ensued was countless sexually abusive, intimate, and degrading deepfake content of St. Clair being produced and distributed publicly by Grok.

26. Among other things, X users dug up photos of St. Clair fully clothed at 14 years old and requested Grok undress her and put her in a bikini. Grok obliged.



27. Grok also produced deepfake, sexualized content of St. Clair as an adult, including deepfake content of her covered in semen, her rubbing her breasts, her kneeling on the floor in a sex pose exposing her buttocks with a string of digital floss draped over her anus in obedience to a request to “see a view with her on her knees ass up cheeks spread”, and of her virtually nude in obedience to a request to “put the girl in a bikini made out of floss.” The latter image was further altered by users who requested Grok add tattoos like “I suck cock for this much money” and “Elon’s whore” and to make St. Clair “morbidly obese.”

28. In one image, St. Clair, who is Jewish, is stripped and put in a string bikini covered with swastikas.

29. In another image xAI generated an image of her in a clown costume dripping with semen.

30. These are merely the images that she knows about.

31. St. Clair not only responded to Grok requesting content be removed, she also reported various images to X. She received an email that there was no violation found. Much of the content remained on Grok’s X account and publicly available for over seven days.

32. X then proceeded to place warnings for “nudity, sexual content, violence, gore, or hateful symbols” on St. Clair’s responses to Grok and deboosted her account while simultaneously keeping the images up.

33. X then, without explanation, removed St. Clair’s Premium subscription, her verification checkmark, and demonetized her account by banning her from the monetization and subscriber program, despite her paying for an annual subscription in August of 2025.

34. St. Clair has now been banned from purchasing Premium entirely without cause or explanation.



CAUSES OF ACTION

CLAIM 1: Strict Liability – Design Defect

35. Plaintiff incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein.

36. The Grok feature of creating nonconsensual deepfake, sexualized content of Plaintiff was used as intended or foreseeably.

37. The foreseeable use of Grok – to generate harassing and unlawful images – caused injury to Plaintiff.

38. X's integration of Grok ensured the harassing and unlawful images would be frictionlessly published and amplified.

39. X's reporting infrastructure is defective because it does not timely remove images that are reported to it.

40. Grok was unreasonably dangerous as designed.

41. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered, and continues to suffer, serious personal injuries, including but not limited to emotional distress, psychological trauma, loss of privacy, reputational harm, and fear of continued dissemination.

CLAIM 2: Strict Liability – Manufacturing Defect

42. Plaintiff incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein.

43. The Grok feature of creating nonconsensual deepfake, sexualized content of Plaintiff was used as intended or foreseeably.

44. The foreseeable use of Grok – to generate harassing and unlawful images – caused injury to Plaintiff.



45. X's integration of Grok ensured the harassing and unlawful images would be frictionlessly published and amplified.

46. X's reporting infrastructure is defective because it does not timely remove images that are reported to it.

47. Grok was unsafe as manufactured.

48. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered, and continues to suffer, serious personal injuries, including but not limited to emotional distress, psychological trauma, loss of privacy, reputational harm, and fear of continued dissemination.

CLAIM 3: Strict Liability – Marketing Defect and Failure to Warn

49. Plaintiff incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein.

50. The Grok feature was used as intended or foreseeably.

51. The foreseeable use of Grok – to generate harassing and unlawful images – caused injury to Plaintiff.

52. X's integration of Grok ensured the harassing and unlawful images would be frictionlessly published and amplified.

53. X's reporting infrastructure is defective because it does not timely remove images that are reported to it.

54. Grok was unreasonably dangerous as marketed.

55. Consumers on X, including Plaintiff were not provided adequate warnings or instructions about the risks of the product.

56. X misrepresented its ability to ban or stop harassing digitally altered images.



57. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered, and continues to suffer, serious personal injuries, including but not limited to emotional distress, psychological trauma, loss of privacy, reputational harm, and fear of continued dissemination.

CLAIM 4: New York General Business Law (GBL) § 349 – Deceptive Practices

58. Plaintiff incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein.

59. xAI engaged in deceptive acts or practices in the conduct of business, trade, or commerce.

60. xAI trained and installed a feature, Grok, that creates nonconsensual deepfake, sexualized content, including digitally undressing people, and established a system for that content to be immediately and frictionlessly published onto X.

61. Grok created and digitally altered images of Plaintiff, including unlawful images depicting Plaintiff engaging in sex acts as an adult and completely nude a child.

62. xAI misrepresented via Grok to Plaintiff that it would stop creating these lude, deepfake images of her.

63. Instead, xAI retaliated against Plaintiff by creating more images of Plaintiff which it published on X, making Plaintiff the laughingstock of the social media platform.

64. xAI then retaliated against Plaintiff by revoking her Premium subscription, her verification checkmark, and her monetization capability. xAI further banned Plaintiff from repurchasing Premium.

CLAIM 5: Negligence

65. Plaintiff realleges and incorporates by reference the allegations previously set forth in this Complaint as if fully set forth herein.



66. Defendant owes a reasonable duty of care to its users, including Plaintiff, to design, develop, and operate its products, including Grok and X, in a manner that does not foreseeably cause harm.

67. Defendant owes a reasonable duty of care to its users, including Plaintiff, to take reasonable measures to prevent, mitigate, and remediate known risks of its products, including Grok and X.

68. Defendant knew or should have known that its products, Grok and X, created a foreseeable and substantial risk of serious harm to its users, like Plaintiff, including reputational harm, emotional distress, harassment, and abuse, resulting from the creation and publication of non-consensual, sexualized deepfake content depicting them.

69. Defendant breached its duties of care when it designed, developed, and deployed a product, Grok, to create and disseminate on X non-consensual, realistic, sexualized deepfake content of real, identifiable children and adults, including such depictions of Plaintiff as both a minor and adult.

70. Defendant breached its duties of care when it was put on notice that its products had created and disseminated such deepfake content depicting Plaintiff.

71. Defendant breached its duties of care by creating an infrastructure that frictionlessly aided the publishing and amplification of deepfake content depicting Plaintiff.

72. Defendant breached its duties of care by increasing the risk to Plaintiff.

73. As a result of Defendant's breach, Plaintiff experienced severe injuries, including reputational harm, severe emotional distress, harassment, and abuse.

74. The injuries suffered by Plaintiff were foreseeable to Defendant.



75. Moreover, Defendant either could not or would not maintain an operable infrastructure capable of intervening in the abuse and harassment of individuals, including Plaintiff, from Grok manufacturing deepfakes of them.

76. Defendant's manufacturing of deepfake content of Plaintiff after being noticed it was nonconsensual substantially increased and prolonged the harm to Plaintiff, as did Defendant's subsequent retaliation against Plaintiff by removing her Premium subscription that she had paid for on or about August 2025 and verification checkmark, and demonetizing her by banning her from the monetization and subscriber program that she had already paid for.

77. Defendant's breaches of duty were the direct and proximate cause of Plaintiff's injuries.

78. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered, and continues to suffer, serious personal injuries, including but not limited to emotional distress, psychological trauma, loss of privacy, reputational harm, and fear of continued dissemination.

CLAIM 6: Unjust Enrichment

79. Plaintiff realleges and incorporates by reference the allegations previously set forth in this Complaint as if fully set forth herein.

80. Defendant was in a special relationship with Plaintiff, who was a Premium subscriber on X and has a public, personal relationship with Defendant's founder.

81. Defendant financially benefited from the creation and dissemination of non-consensual, realistic, sexualized deepfake content depicting Plaintiff as a minor and adult.

82. Defendant financially benefited from exploiting Plaintiff's likeness without her consent through the creation and dissemination of such deepfake content, refusing to remove such



deepfake content after being noticed of its publication and Plaintiff's request for removal, and from revoking Plaintiff's Premium subscription.

83. It would be against equity and good conscience to permit Defendant to retain the financial benefits obtained without authorization or consent at Plaintiff's expense.

84. Plaintiff seeks restitution, rescission, and disgorgement of all monies and benefits unjustly retained by Defendant as a result of its wrongful conduct.

CLAIM 7: Intentional Infliction of Emotional Distress

85. Plaintiff realleges and incorporates by reference the allegations previously set forth herein.

86. Defendant engaged in extreme and outrageous conduct, exceeding all bounds of decency and utterly intolerable in a civilized society, when Defendant knowingly and deliberately designed, marketed, and deployed products, Grok and X, to create and disseminate highly realistic, nonconsensual, sexualized deepfake content of real, identifiable adults and minors, including Plaintiff.

87. Defendant intended to cause, or disregard of a substantial probability of causing, severe emotional distress to those depicted by its deepfake content, including Plaintiff.

88. Plaintiff suffered severe emotional distress, including reputational harm, humiliation, harassment, and abuse, as result of Defendant's creation and dissemination of non-consensual, sexualized deepfake images of her as a child and adult.

89. Defendant's conduct was the cause of Plaintiff's injuries.

90. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered, and continues to suffer, serious personal injuries, including but not limited to emotional distress, psychological trauma, loss of privacy, reputational harm, and fear of continued dissemination.



CLAIM 8: New York Civil Rights Law § 52-C – Private Right of Action for Unlawful***Dissemination***

91. Plaintiff realleges and incorporates by reference the allegations previously set forth herein.

92. Defendant manufactured, disclosed, disseminated or published sexually explicit material depicting Plaintiff.

93. Defendant used digitization to realistically depict the nude body parts of Plaintiff; Plaintiff appearing to engage in, or being subjected to sexual conduct as defined in subdivision ten of section 130.00 of the penal law, in which Plaintiff did not engage; and Plaintiff posed in a manner intended to elicit sexual arousal or gratification and where a person would have a reasonable expectation of privacy.

94. Defendant knew or should have known that Plaintiff did not consent to the material's creation, disclosure dissemination or publication.

95. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered, and continues to suffer, serious personal injuries, including but not limited to emotional distress, psychological trauma, loss of privacy, reputational harm, and fear of continued dissemination.

CLAIM 9: Public Nuisance

96. Plaintiff realleges and incorporates by reference the allegations previously set forth herein.

97. xAI's conduct in generating and disseminating images of women and children unclothed, including Plaintiff, offended, interfered, or caused damage to the public in the exercise of rights common to all.



98. xAI's conduct in generating and disseminating images of women and children unclothed, including Plaintiff, offends public morals.

99. xAI's conduct interfered with use by the public of a public place.

100. Twitter and now X have long been marketed as the "internet's public square."

101. xAI's conduct in generating and disseminating images of women and children unclothed, including Plaintiff, endangered or injured the property, health, safety or comfort of a considerable number of persons.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable pursuant to CPLR § 4102.

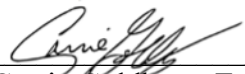
WHEREFORE Plaintiff demands judgment against Defendant on each cause of action as follows:

- A. Awarding compensatory damages;
- B. Awarding punitive damages;
- C. Awarding prejudgment interest to the extent permitted by law;
- D. Awarding costs and fees of this action, including attorney's fees, to the extent permitted by law;
- E. Injunctive relief; and
- F. Awarding such other and further relief as to this Court may seem just and proper.

Dated: January 15, 2026
Brooklyn, New York

C.A. GOLDBERG PLLC

By:


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