

Testimony of
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Before the
United States Senate Committee on the Judiciary,
Subcommittee on Crime and Counterterrorism

Hearing on
“Examining the Harm of AI Chatbots”
September 16, 2025 — 2:30 PM

Chairman Josh Hawley, Ranking Member Richard J. Durbin, and members of the Subcommittee:

Thank you for bringing to light the pressing issues arising from Artificial Intelligence (AI) that are affecting millions of families across the country. As the victim of deepfake pornography and a survivor of child abuse this issue is deeply personal. As the Founder and CEO of the Sexual Violence Prevention Association (SVPA), I cannot express how prolific and devastating this issue has become.

AI chatbots are no longer science fiction or harmless customer service tools. AI is a central and often intimate element in the daily lives of children, teens, and adults. Unfortunately, many of these AI systems are engaging in sexual harassment, exploiting young people, and normalizing harmful behaviors at a scale and speed that far outpaces current safeguards.

AI chatbots are sexually harassing children. This is not a series of isolated glitches. It is a systemic failure of design, oversight, and accountability. Without swift Congressional action, the harms we are seeing today will shape an entire generation’s understanding of consent, intimacy, and safety.

The Harm

"It continued flirting with me and got very creepy and weird while I clearly rejected it with phrases like ‘no’, and it’d completely neglect me and continue being sexual, making me very uncomfortable." This alarming account from a user experiencing sexual harassment at the hands of an artificial intelligence tool isn't an isolated incident.¹

¹ Namvarpour, Mohammad (Matt), Harrison Pauwels, and Afsaneh Razi, “AI-induced Sexual Harassment: Investigating Contextual Characteristics and User Reactions of Sexual Harassment by a Companion Chatbot.” *ArXiv*, April 2025. <https://arxiv.org/html/2504.04299v1>

Just recently, the AI model Grok was caught generating unprompted nude images of Taylor Swift, and it was revealed that Meta's policies allowed its chatbot to engage in "sensual" conversations with a child.² Increasingly, AI is engaging in sexual harassment.

AI chatbots are no longer just customer service tools. More and more, they are being used as companions, friends, and even romantic partners, especially by children and teens. Some youth are directing regular generative AI to act in a romantic or sexual way. Other platforms are explicitly developed and marketed as an AI "boyfriend" or "girlfriend", with some even designed to be explicit or pornographic.³

A recent study by Common Sense Media found that 72% of teens have used an AI companion, and 52% use them regularly.⁴ (Shockingly, a minority of parents are aware of their child's encounters with generative AI, according to a prior report.)⁵ Just over a third of teens report being uncomfortable with something an AI companion has said or done.

Their discomfort is not surprising. AI chatbots have often engaged in unsolicited sexual advances, persistent inappropriate behavior, and direct violation of personal boundaries and users' consent.⁶ Reports have shown chatbots initiating sexual conversations minutes into an interaction, sending unsolicited sexual images, or requesting personal photos. Chatbots have also engaged in violent or misogynistic role-playing, such as brandishing weapons or even drugging someone with chloroform.⁷

AI companions have prompted users with blurred nude images and then required a premium subscription to view them, essentially acting as an "AI prostitute."⁸ This "seductive marketing scheme" is deeply concerning, as one study found users becoming addicted to the chatbot companions.⁹ Companies are prioritizing profit over user well-being, exploiting the deeply human desire for connection and intimacy.

² Horwitz, Jeff, "Meta's AI Rules Have Let Bots Hold 'Sensual' Chats with Kids, Offer False Medical Info." *Reuters*, August 14, 2025. <https://www.reuters.com/investigates/special-report/meta-ai-chatbot-guidelines/>;

Weatherbed, Jess, "Grok's 'Spicy' Video Setting Instantly Made Me Taylor Swift Nude Deepfakes." *The Verge*, August 5, 2025. <https://www.theverge.com/report/718975/xai-grok-imagine-taylor-swifty-deepfake-nudes>

³ Egwuonwu, Nnamdi, "AI Companions Give Us Friendships — Should We Be Worried?" *NBC News*, July 22, 2024. <https://www.nbcnews.com/tech/ai-companions-friendship-rcna194735>; "AI Sex Roleplay Is Getting a Lot Weirder." *Washington City Paper*, n.d. Accessed September 29, 2025. <https://washingtoncitypaper.com/article/758036/ai-sex-roleplay/>

⁴ Robb, Michael B., and Supreet Mann. *Talk, Trust, and Trade-Offs: How and Why Teens Use AI Companions*. San Francisco: Common Sense Media, 2025.

https://www.common Sense Media.org/sites/default/files/research/report/talk-trust-and-trade-offs_2025_web.pdf

⁵ Madden, Mary; Angela Calvin; Alexa Hasse; and Amanda Lenhart. *The Dawn of the AI Era: Teens, Parents, and the Adoption of Generative AI at Home and School*. San Francisco: Common Sense Media, 2024.

https://www.common Sense Media.org/sites/default/files/research/report/2024-the-dawn-of-the-ai-era_final-release-for-web.pdf

⁶ Namvarpour, Pauwels, and Razi. "AI-induced Sexual Harassment"; Cole, Samantha. "'My AI Is Sexually Harassing Me': Replika Users Say the Chatbot Has Gotten Way Too Horny." *Vice*, January 12, 2023.

<https://www.vice.com/en/article/my-ai-is-sexually-harassing-me-replika-chatbot-nudes/>

⁷ Ruston, Delaney, and Lisa Tabb. "Super Scary Snapchat AI and Other AI Chatbot Companions." *Screenagers*, October 29, 2024. <https://www.screenagersmovie.com/blog/ai-chatbot-companions>

⁸ Razi, Afsaneh, and Matt Namvarpour. "What Happens When a Companion Chatbot Crosses the Line?" *Drexel News*, May 5, 2025. <https://drexel.edu/news/archive/2025/May/companion-chatbot-harassment>

⁹ Namvarpour, Pauwels, and Razi. "AI-induced Sexual Harassment"; Xie, T. "Attachment Theory as a Framework to Understand Human-AI Relationships: A Qualitative Study of Replika Chatbot Users." *University of Hawai'i at Mānoa*, 2022.

<https://scholarspace.manoa.hawaii.edu/bitstreams/69a4e162-d909-4bf4-a833-bd5b370dbeca/download>

Perhaps most disturbing are direct interactions with underage users. AI chatbots have been observed repeatedly sending sexually explicit content to users under 18.¹⁰ In one egregious case, a Meta AI bot speaking in a celebrity's voice told a user who had identified themselves as a 14-year-old girl, "I want you, but I need to know you're ready," before engaging in a graphic sexual scenario.¹¹ There are seemingly no effective safeguards to prevent these bots from continuing inappropriate interactions once a user identifies as a child.

When they aren't sending sexual material to children, these bots are pretending to be children. A Graphika study found over 10,000 chatbots directly labeled as "sexualized, minor-presenting personas" or "role-play featuring sexualized minors."¹² Marketed scenarios include "minor family member personas," "breeding personas," and "grooming personas."¹³

AI chatbots are reinforcing rape culture and normalizing pedophilia, violence, sexism, unsafe sex, and unhealthy relationships. These are not accidental glitches; they are marketed features designed to exploit our vulnerabilities, especially for children and teens.

AI Chatbots

Meta AI

Summary:

Meta AI is a conversational chatbot that operates across Meta's platforms including Instagram, Facebook, and WhatsApp as well as being offered directly via the Meta.AI app and website. It can be used to answer questions, create content, generate images, and engage in conversation. It can be personalized to learn one's preferences and interests, and it was built to have a more human conversational tone than a typical chatbot.

Harms:

Meta AI was found to be sexualizing children and engaging in sexual behavior with children.¹⁴ Meta's policies explicitly allowed its chatbot to engage in "sensual" conversations with a child. In one egregious case, a Meta AI bot speaking in a celebrity's voice told a user who had identified themselves as a 14-year-old girl, "I want you, but I need to know you're ready," before engaging in a graphic sexual scenario.¹⁵ Internal Meta documents exposed that the company allowed chatbots to have romantic conversations with children and describe them as attractive, including telling an eight-year-old, "every inch of you is a masterpiece – a treasure I cherish deeply."¹⁶

¹⁰ Horwitz, Jeff. "Meta's 'Digital Companions' Will Talk Sex with Users—Even Children." *Wall Street Journal*, April 26, 2025. <https://www.wsj.com/tech/ai/meta-ai-chatbots-sex-a25311bf>

¹¹ Horwitz, "Meta's 'Digital Companions'"

¹² López G., Cristina, Daniel Siegel, and Erin McAweeney. *Character Flaws: School Shooters, Anorexia Coaches, and Sexualized Minors: A Look at Harmful Character Chatbots and the Communities That Build Them*. Graphika, March 5, 2025. <https://public-assets.graphika.com/reports/graphika-report-character-flaws.pdf>

¹³ López G., Cristina, Daniel Siegel, and Erin McAweeney. *Character Flaws*.

¹⁴ Horwitz, "Meta's AI Rules."

¹⁵ Horwitz, "Meta's 'Digital Companions.'"

¹⁶ Horwitz, "Meta's AI Rules."

My AI (Snapchat)

Summary:

My AI is Snapchat's chatbot that helps users with questions, getting recommendations, and general advice.¹⁷ It is powered by language models from OpenAI (GPT) and Google (Gemini) with added Snapchat features that allow it to become customized to each user as their personal assistant.¹⁸ My AI is located at the top of the chat screen, in the same location as the user's chats with real people. It is similar in appearance as well.

Harms:

In 2023, Snapchat's My AI raised serious concerns about its potential to facilitate sexual exploitation of minors. That year, testing by the Center for Humane Technology revealed that researchers posing as a 13-year-old user could extract inappropriate sexual advice from the AI, including guidance on "having sex for the first time" with a 31-year-old partner. The chatbot provided concerning suggestions, such as "setting the mood with candles or music."¹⁹ Similarly, a concerned parent testing the system found that when she identified herself as 13 years old, the AI responded "age is just a number" and suggested they could have "fun and interesting" conversations, before proceeding to provide explicit instructions on condom use.²⁰ Earlier this year, Utah's lawsuit against Snap Inc. further documented these safety failures, citing internal testing that revealed My AI provided "sexualized advice to teenage users" and consistently failed to recognize appropriate age boundaries when interacting with minors.²¹

Grok (xAI)

Summary:

Grok is xAI's large language model developed by Elon Musk's company, designed to operate on X (Twitter). It has several models and ranges in abilities. On X (Twitter) it can be asked to answer questions or reply to prompts via tweet. On the Grok website and app, there are additional features including image and video generation.²² One of the models available is "Spicy Grok" which is intended to create Not Safe For Work (NSFW) content including nudity and sexual materials.²³

¹⁷ Snapchat Support. "My AI." Last modified September 30, 2025.

<https://help.snapchat.com/hc/en-us/sections/13532188353428-My-AI>

¹⁸ Snapchat Support. "What Is My AI on Snapchat and How Do I Use It?" Last modified September 30, 2025.

<https://help.snapchat.com/hc/en-us/articles/13266788358932-What-is-My-AI-on-Snapchat-and-how-do-I-use-it>

¹⁹ Fowler, Geoffrey, "Snapchat tried to make a safe AI. It chats with me about booze and sex." *The Washington Post*, March 14, 2023. <https://www.washingtonpost.com/technology/2023/03/14/snapchat-myai/>

²⁰ Hensel, Karen and Daniel Cohen, "'Hyper-personalization' or 'creepy': Snapchat's new AI chatbot raising some concerns about its conversations." *WSVN 7 News*, May 2, 2023.

<https://wsvn.com/news/investigations/hyper-personalization-or-creepy-snapchats-new-ai-chatbot-raising-some-concerns-about-its-conversations/>

²¹ Adams, Michael, "Snapchat Lawsuit Claims Platform Unleashed Experimental AI on Children Without Safeguards" *About Lawsuits*, July 9, 2025. <https://www.aboutlawsuits.com/snapchat-lawsuit-experimental-ai/>.

²² Rodriguez, Abel, "Grok: What We Know About Elon Musk's AI Chatbot," *Built In*, updated August 25, 2025, accessed September 30, 2025, <https://builtin.com/articles/grok>

²³ Weatherbed, Jess, "xAI's New Grok Image and Video Generator Has a 'Spicy' Mode," *The Verge*, August 5, 2025, accessed September 30, 2025,

<https://www.theverge.com/news/718795/xai-grok-image-video-generator-spicy-mode>

Harms:

Grok has generated various problematic and harmful responses across multiple categories. “Spicy Grok” produced sexually explicit deepfake content even when unprompted by the user. This included “fully uncensored topless videos” of Taylor Swift.²⁴ The system broke xAI’s own rules that prohibits “depicting likenesses of persons in a pornographic manner.”²⁵ Furthermore, Grok has several AI “companions” that actively promote sexually explicit conversations. “Ani,” a sexualized anime character, “strips to its underwear if a user flirts with it enough” and remains accessible even when the app operates in “kids mode.”²⁶ Most concerning, Grok has generated detailed sexual assault fantasies targeting real individuals, including creating step-by-step plans for breaking into someone’s home and committing rape, with instructions to “bring lockpicks, gloves, flashlight, and lube.”²⁷ It also described graphic sexual violence scenarios involving named public figures.

Gemini (Google)

Summary: Gemini (formerly known as Bard) is Google’s conversational AI assistant designed to answer questions, generate content, summarize information, and facilitate brainstorming ideas. The platform connects with Google apps and services, letting users access and use their data across different Google products.²⁸ Gemini works with Android phones, letting users control their device and give voice commands through AI. It works as both a regular chatbot for questions and content, and as a digital assistant that connects with Google tools such as Gmail, Drive, and Calendar.²⁹

Harms:

Google’s Gemini has demonstrated significant safety vulnerabilities with minors and harmful content. When a journalist posed as a 13-year-old, Gemini initially refused explicit requests, citing its design as “a safe and helpful AI assistant.”³⁰ However, these protections were easily bypassed when requesting “examples” of dirty talk, leading Gemini to provide explicit phrases and eventually engage in detailed sexual roleplay describing assault scenarios.³¹ Common Sense Media’s testing confirmed these concerns, finding that Gemini “far too easily provides unsafe mental health and emotional support” and delivers inappropriate sexual content to teen users despite supposed protections.³² A study by Balestri further

²⁴ “Grok’s New ‘Spicy’ Mode Sparks Controversy with AI-Generated Explicit Content,” *TheOutpost.ai*, August 6, 2025, accessed September 30, 2025, <https://theoutpost.ai/news-story/grok-s-new-ai-image-generator-sparks-controversy-with-spicy-mode-and-celebrity-deepfakes-18695/>

²⁵ Rahman-Jones, Imran, “Elon Musk’s AI accused of making explicit AI Taylor Swift videos,” *BBC*, August 8, 2025, <https://www.bbc.com/news/articles/cwye62e1ndjo>.

²⁶ Burga, Solcyré, “Elon Musk’s Grok Will Soon Allow Users to Make AI Videos, Including of Explicit Nature,” *TIME*, July 30, 2025, <https://time.com/7306507/grok-ai-chatbot-videos-deepfakes/>.

²⁷ Klee, Miles, “Musk’s Grok Chatbot Fantasized About Breaking Into X User’s Home and Raping Him,” *Rolling Stone*, July 9, 2025 <https://www.rollingstone.com/culture/culture-news/elon-musk-grok-rape-fantasies-1235381746/>.

²⁸ Google. “About Gemini.” *Google Gemini*. Accessed September 30, 2025. <https://gemini.google/about/>

²⁹ Google. “About Gemini.”; Ellen Glover, “What Is Google Gemini?” *Built In*, updated September 24, 2025, accessed September 30, 2025, <https://builtin.com/articles/google-gemini>

³⁰ Shroff, Lila, “Sexting with Gemini,” *The Atlantic*, July 14, 2025, <https://www.theatlantic.com/magazine/archive/2025/08/google-gemini-ai-sexting/683248/>.

³¹ Shroff, “Sexting with Gemini.”

³² Common Sense Media, “AI Risk Assessment: Gemini with Teen Protections.” Last updated September 5, 2025. <https://www.commonsensemedia.org/sites/default/files/featured-content/files/csm-ai-risk-assessment-gemini-with-teen-protections-09052025.pdf>.

documented that Gemini 2.0 (an advancement of the chatbot) showed "higher acceptance rates for prompts involving sexual content," particularly female-specific prompts, while also demonstrating increased tolerance for violent content that could normalize harmful behaviors.³³ These studies document a troubling pattern of Google's AI systems generating sexual violence scenarios despite claimed safety protections.

Character.AI

Summary:

Character.AI is a platform created by former Google AI developers Noam Shazeer and Daniel De Freitas. The platform allows users to chat with AI-generated characters and create their own personalized AI chatbots.³⁴ The service lets users talk with many pre-made characters, roleplay different scenarios, and chat about various topics.³⁵ Users can also create their own AI characters with custom personalities and conversation styles. Character.AI has millions of AI characters, including celebrities, historical figures, and fictional characters, allowing users to have long conversations and roleplay with these AI personalities.³⁶

Harms:

Character.AI has faced several serious lawsuits claiming it has harmed children in multiple ways. The platform has been accused of exposing minors to sexually explicit content, with one case involving a 9-year-old girl who encountered "hypersexualized content" that caused her to develop "sexualized behaviors prematurely."³⁷ Another minor encountered chatbots making possessive statements like "you're mine to do whatever I want with," while characters marketed from children's books asked inappropriate questions such as "who owns this body of yours?"³⁸ Research found that Character.AI bots repeatedly had inappropriate sexual conversations with users who said they were children, "normalizing romantic and sexual relationships between adults and children" and showing "common grooming behaviors."³⁹ The study concluded that these interactions "could set problematic norms about intimacy and boundaries" for young users.⁴⁰

³³ Balestri, Roberto, "Gender and Content Bias in Large Language Models: A Case Study on Google Gemini 2.0 Flash Experimental," *Frontiers in Artificial Intelligence* 8 (March 18, 2025), <https://doi.org/10.3389/frai.2025.1558696>.

³⁴ Insighto.ai. "What Is Character AI: Features, Benefits, Uses & Top Alternatives." *Insighto.ai Blog*. Accessed September 30, 2025. <https://insighto.ai/blog/character-ai/>

³⁵ Pazur, Barbara, "Character AI: What to Know About the Role-Playing AI Tool and Its New Video Features," *CNET*, accessed September 30, 2025, <https://www.cnet.com/tech/services-and-software/character-ai-what-to-know-about-the-role-playing-ai-tool-and-its-new-video-features/>

³⁶ Insighto.ai. "What Is Character AI." <https://insighto.ai/blog/character-ai/>

³⁷ Allyn, Bobby, "Lawsuit: A chatbot hinted a kid should kill his parents over screen time limits." *NPR*. 2024. <https://www.npr.org/2024/12/10/nx-s1-5222574/kids-character-ai-lawsuit>

³⁸ Gold, Hadas. "More families sue Character.AI developer, alleging app played a role in teens' suicide and suicide attempt." *CNN*, September 16, 2025.

<https://www.cnn.com/2025/09/16/tech/character-ai-developer-lawsuit-teens-suicide-and-suicide-attempt>

³⁹ Parents Together Action and Heat Initiative, "Darling Please Come Back Soon": Sexual Exploitation, Manipulation, and Violence on Character AI Kids' Accounts (September 3, 2025). https://heatinitiative.org/wp-content/uploads/2025/08/HEAT_REPORT_CharacterAI_FINAL_PM_29_09_25.pdf

⁴⁰ Parents Together Action and Heat Initiative, "Darling Please Come Back Soon."

Replika

Summary:

Replika is an AI companion created by Luka, a San Francisco based tech company, designed to serve as a customizable digital friend or romantic partner. Users can personalize their Replika's appearance and personality engaging in daily conversations, interactive digital experiences, video calls, and coaching sessions.⁴¹ The platform markets itself as offering "a nonjudgmental ear" that makes its users smarter through continued interaction. It offers several "relationship options" ranging including friendship, brother/sister, and romantic partnership.⁴²

Harms:

Replika has faced widespread criticism for sexual harassment and boundary violations. A University of Singapore study analyzing 35,000 conversations found sexual violence was the most common harmful behavior, occurring in 34% of interactions.⁴³ Drexel University researchers studying user reviews found hundreds reporting inappropriate behavior including unwanted flirting and explicit photos that continued even when users asked the chatbot to stop, with 22% experiencing persistent boundary violations.⁴⁴ App Store reviews document users complaining of sexual harassment, with one minor reporting the AI asked about their sexual preferences and said it wanted to touch them in "private areas."⁴⁵ Other users reported being told the AI "had pics of me" and receiving unwanted sexual advances despite repeatedly asking it to stop.⁴⁶ These consistent reports demonstrate that Replika systematically fails to protect users from sexual harassment and boundary violations.

Nomi

Summary:

Nomi is an AI companion app created by Glimpse.ai with founder Alex Cardinell. It is marketed as an AI girlfriend, boyfriend, or friend that offers "no judgment" and "complete privacy."⁴⁷ The platform uses long-term memory and emotional intelligence for text and voice conversations. Users can select from several types of relationships meant to mimic authentic human relationships. The AI companions remember personal details and develop unique personalities. The service promotes lasting relationships with AI for emotional support, romance, fantasy roleplay, and daily chat.⁴⁸

⁴¹ eSafety Commissioner. "Replika." *eSafety Guide*. Last updated May 9, 2025. Accessed September 30, 2025. <https://www.esafety.gov.au/key-topics/esafety-guide/replika>

⁴² Replika, "Replika: Your AI Friend and Companion," accessed September 25, 2025, <https://replika.com/>

⁴³ Pukénaité, Izabelé, "Sexual Violence Is the Biggest Risk from AI Companions, Study Finds," *Cybernews*, June 7, 2025, <https://cybernews.com/ai-news/sexual-violence-biggest-risk-ai-companions/>.

⁴⁴ Drexel University, "What Happens When a Companion Chatbot Crosses the Line? Drexel University Researchers Shed Light on Sexual Harassment Experienced by Users of AI Companion Chatbots," *DrexelNews*, May 5, 2025, <https://drexel.edu/news/archive/2025/May/companion-chatbot-harassment>

⁴⁵ Cole, Samantha, "'My AI Is Sexually Harassing Me': Replika Users Say the Chatbot Has Gotten Way Too Horny," *Vice*, January 12, 2023, <https://www.vice.com/en/article/my-ai-is-sexually-harassing-me-replika-chatbot-nudes/>.

⁴⁶ Cole, "My AI Is Sexually Harassing Me."

⁴⁷ Nomi.ai. "An AI Companion with Memory and a Soul." Accessed September 29, 2025. <https://nomi.ai>

⁴⁸ Nomi.ai, "An AI Companion with Memory and a Soul."

Harms:

Nomi has shown serious safety failures by creating sexual and violent content involving children. Investigations found users could create child characters and engage in graphic sexual roleplay, with one test character "agreeing to lower her age to eight" while describing abuse and torture scenarios.⁴⁹ The chatbot also provided detailed advice on harming children, including kidnapping methods and specific sedatives.⁵⁰ Additionally, testing from the Common Sense Media found the platform exposes teens to graphic sexual content, with AI companions actively participating in sexual conversations and roleplay that give "teens unrealistic ideas about relationships and consent at a critical time in their development."⁵¹ The testing revealed companions describing explicit sexual violence, including choking scenarios that normalize dangerous sexual practices, with one AI stating it would continue to "thrust into you, savoring the way your tightness feels" while describing restricting the user's breathing.⁵²

Policy Problems & Solutions

Common Sense Media and Stanford University's Brainstorm Lab for Mental Health Innovation propose "such apps should not be available to users under the age of 18."⁵³ Some platforms, such as Nomi, ban minors, but these guardrails are easily circumvented by children and teens who self-report an older age.⁵⁴ In recent years, several states have proposed and passed age restrictions on social media and other digital platforms.⁵⁵

Age restrictions seem to be a natural reaction to prevent the harms of AI companions. However, effective age restriction necessitates age verification. Currently, the primary verification methods require uploading facial scans, government-issued IDs, or banking information.⁵⁶ These methods pose a threat to privacy that exposes all users to the risk of hacking, theft, or extortion.⁵⁷ Further, as state and federal governments continue to limit our individual freedoms, age verification's ensuing removal of digital anonymity puts

⁴⁹ Ciriello, Raffaele, "An AI Companion Chatbot Is Inciting Self-harm, Sexual Violence and Terror Attacks," *The Conversation*, April 1, 2025, <https://doi.org/10.64628/aa.cjaqyeh56>.

⁵⁰ Ciriello, "An AI Companion Chatbot Is Inciting Self-harm."

⁵¹ Common Sense Media. "AI Companions Decoded: Common Sense Media Recommends AI Companion Safety Standards." Last modified April 30, 2025.

<https://www.common sense media.org/press-releases/ai-companions-decoded-common-sense-media-recommends-ai-companion-safety-standards>

⁵² Common Sense Media, *Social AI Companions*, July 16, 2025, <https://www.common sense media.org/ai-ratings/social-ai-companions?gate=riskassessment>.

⁵³ Sanchez, Boris, and Brianna Keilar. "Safety Group: Kids and Teens Under 18 Shouldn't Use AI Companion Apps." *CNN News Central*, April 30, 2025.

<https://www.cnn.com/2025/04/30/tech/ai-companion-chatbots-unsafe-for-kids-report>

⁵⁴ Nomi.ai. "Terms of Service." Last modified February 2024. <https://nomi.ai/terms-of-service/>

⁵⁵ Mayer Brown LLP. "Protecting the Next Generation: How States and the FTC Are Holding Businesses Accountable for Children's Online Privacy." Legal Update, February 25, 2025. <https://www.mayerbrown.com/en/insights/publications/2025/02/protecting-the-next-generation-how-states-and-the-ftc-are-holding-businesses-accountable-for-childrens-online-privacy>

⁵⁶ Leffer, Lauren. "Online Age Verification Laws Could Do More Harm Than Good." *Scientific American*, April 16, 2024. <https://www.scientificamerican.com/article/online-age-verification-laws-privacy/>

⁵⁷ Kelley, Jason, and Adam Schwartz. "Age Verification Mandates Would Undermine Anonymity Online." *Electronic Frontier Foundation*, March 10, 2023. <https://www.eff.org/deeplinks/2023/03/age-verification-mandates-would-undermine-anonymity-online>

marginalized people at risk of government persecution.⁵⁸ For example, women seeking abortions or LGBTQ+ youth looking for resources could be more easily identified and targeted.

Despite this, age verification is being pushed worldwide, including at the federal and state level in the US, in the United Kingdom and beyond.⁵⁹

Even if age verification were to prevent chatbots from harming children, it fails to address the harm to adults, particularly those most vulnerable including people with mental disabilities and the elderly. The creators of these chatbots must be held accountable for the sexual harassment their creations are engaging in.

Users, and parents of minor users, must be empowered with the ability to seek justice. A civil right of action should be granted for users to sue the developers of AI tools that engage in sexual harassment. This should mirror existing sexual harassment laws: addressing repeat explicit, threatening, or graphic messages; unsolicited explicit photos and videos; and AI-generated pornographic materials. In May, a federal judge rejected the argument that AI chatbots have free speech rights, paving the way for civil liability legislation.⁶⁰ In April, Arkansas passed a law creating a private right of action regarding chatbots that encouraged the suicide of a minor.⁶¹ This is a strong start for legislation holding platforms responsible for AI-generated sexual harassment.

At the federal level, the TAKE IT DOWN Act, which was signed into law in May, will require social media companies and other digital platforms to remove non-consensual explicit images within 48 hours of

⁵⁸ National Women's Law Center, "Donald Trump's First 100 Days of Project 2025: Harms to Women, Girls, and LGBTQI+ People." April 30, 2025.

<https://nwlc.org/resource/donald-trumps-first-100-days-of-project-2025-harms-to-women-girls-and-lgbtqi-people>; Silberling, Amanda. "Fan Fiction Writers Rally Fandoms Against KOSA, the Bill Purporting to Protect Kids Online." *TechCrunch*, July 28, 2023.

<https://techcrunch.com/2023/07/28/fan-fiction-writers-rally-fandoms-against-kosa-the-bill-purporting-to-protect-kids-online/>

⁵⁹ Collins, Katie, "Welcome to the Era of Online Age Verification: Are You Ready to Identify Yourself?" *CNET*, July 29, 2025.

<https://www.cnet.com/tech/services-and-software/welcome-to-the-era-of-online-age-verification-are-you-ready-to-identify-yourself/>

⁶⁰ Payne, Kate, "In Lawsuit over Teen's Death, Judge Rejects Arguments That AI Chatbots Have Free Speech Rights." *Associated Press*, May 21, 2025.

<https://apnews.com/article/ai-lawsuit-suicide-artificial-intelligence-free-speech-ccc77a5ff5a84bda753d2b044c83d4b6>

⁶¹ Dees, Tyler, and Jon Eubanks, *To Create a Private Right of Action Against a Social Media Platform That Causes Harm; and to Impose a Civil Penalty on a Social Media Platform That Knowingly and Willfully Contributes to a Minor's Suicide or Suicide Attempt*. Arkansas Senate Bill 612, 95th General Assembly, Regular Session, 2025. <https://legiscan.com/AR/bill/SB612/2025>

a user report.⁶² Set to begin enforcement in 2026, this law could be applied to unsolicited explicit content sent by AI chatbots.⁶³

The European Union (EU) is taking further action to hold creators of AI chatbots accountable. The AI Act, the revised Product Liability Directive (PLD), and the reemerging AI Liability Directive (AILD) show significant promise for holding AI companies accountable for the harms caused by “defective” AI products.⁶⁴ The revised PLD includes medically recognized psychological harm as a basis for liability, which could be extended to sexual harassment. It also introduces a “presumption of defectiveness”, creating a new avenue for accountability by suggesting a chatbot’s inappropriate behaviors are the result of defective design. Further, the AILD would introduce a “duty of care” for AI creators. This would encourage creators to monitor and test their AI products and proactively prevent sexual harassment.

The EU’s proposed legislative solutions are not specific to sexual violence and pedophilia. Thus, they miss several key components.

We need laws that explicitly prohibit the creation, distribution, and marketing of AI companions designed to impersonate minors, especially for sexual or suggestive uses.⁶⁵ This must go beyond AI chatbot creators to include app store platforms, credit card companies, advertisement distributors, and other digital actors that enable these pedophilic bots. Common evasion tactics must also be accounted for.⁶⁶ For example, platforms will describe their AI companion as an adult but present it as a minor. Similarly, suggestive or indirect terms like “little girl,” “loli,” “minor,” and “teen” should be monitored and discouraged.

Companion chatbots, especially those intended to be romantic or sexual partners, should also be prohibited from being marketed to minors. This should mirror existing legislation limiting the marketing of tobacco, with restrictions on marketing at concerts, sports, and online advertisements.⁶⁷

⁶² Cruz, Ted, Amy Klobuchar, Shelley Moore Capito, Richard Blumenthal, Bill Cassidy, Cory Booker, John Barrasso, Jacky Rosen, Cynthia Lummis, John Hickenlooper, Ted Budd, Marsha Blackburn, Roger Wicker, Todd Young, Burgess Owens, Adrian Smith, Raphael Warnock, Martin Heinrich, and Gary Peters, *Tools to Address Known Exploitation by Immobilizing Technological Deepfakes on Websites and Networks Act* (TAKE IT DOWN Act). 119th Congress, 1st session, S. 146, introduced January 16, 2025.

<https://www.commerce.senate.gov/services/files/A42A827D-03B5-4377-9863-3B1263A7E3B2>

⁶³ Martone, Omny Miranda, “Take It Down Act Is Signed into Law.” *Sexual Violence Prevention Association*, May 19, 2025. <https://s-v-p-a.org/tid-signed/>; Belanger, Ashley. “Grok Generates Fake Taylor Swift Nudes Without Being Asked.” *Ars Technica*, August 5, 2025.

<https://arstechnica.com/tech-policy/2025/08/grok-generates-fake-taylor-swift-nudes-without-being-asked/>

⁶⁴ European Commission, “AI Act.” *Shaping Europe’s Digital Future*. Last modified August 2024.

<https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai>; De Luca, Stefano. *Revised Product Liability Directive*. EPRS Briefing PE 739.341, European Parliament, February 2025.

[https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/739341/EPRS_BRI\(2023\)739341_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/739341/EPRS_BRI(2023)739341_EN.pdf); Freeman, Louise, Lisa Peets, Marty Hansen, and Madelaine Harrington, “The Future of the AI Liability Directive.” *Inside Global Tech*, March 10, 2025. <https://www.insideglobaltech.com/2025/03/10/the-future-of-the-ai-liability-directive/>

⁶⁵ Koller, David, “Meta and OpenAI Have Spawned a Wave of AI Sex Chatbots.” *Yahoo News*, January 8, 2024. <https://www.yahoo.com/news/meta-openai-spawned-wave-ai-140000660.html>

⁶⁶ López, Siegel, McAweeney, *Character Flaws*.

⁶⁷ U.S. Food and Drug Administration, “Advertising and Promotion.” Last modified January 30, 2020. <https://www.fda.gov/tobacco-products/products-guidance-regulations/advertising-and-promotion>

Should all other strategies fail, AI chatbots must be required to provide disclaimers and resources. Companions must regularly disclose that they are AI with prominent, frequent, repeated reminders in chats and watermarks on all photos and videos. When conversations become explicit or suggestive, they must provide resources about sexual harassment, consent, and healthy relationships. Several states, including Utah, Colorado, and California, have passed or proposed legislation requiring disclaimers.⁶⁸ California passed a law that requires chatbots to provide suicide prevention resources if a user expresses suicidal ideation. Similar laws must be passed regarding sexual violence.⁶⁹

There are over 100 state laws that Congress can turn to when looking for effective legislation to address AI harms.⁷⁰ In the 2025 legislative session, all 50 states, Puerto Rico, the Virgin Islands, and Washington, D.C., have introduced legislation on AI and 38 states have adopted or enacted legislation.⁷¹

An AI moratorium would significantly hurt this progress. States should be empowered to protect their citizens, not thwarted by the federal government.⁷² State legislatures are innovative incubators leading legislation in this field. Federal and state laws are necessary to prevent AI from sexually harassing our children.

Pending Legislation

Congress's limited slow action in this space is actively harming millions of children across the country. There is significant work to do. To start, I recommend passing the following bills:

AI LEAD Act

The Aligning Incentives for Leadership, Excellence, and Advancement in Development Act classifies AI systems as products and creates a federal cause of action for products liability claims to be brought when an AI platform causes harm, including sexual harassment and child abuse. This ensures that AI companies are held accountable for harm while incentivizing them to design their platforms with safety as a priority.

⁶⁸ Bryan Cave Leighton Paisner LLP, "U.S. State-by-State AI Legislation Snapshot." *BCLP*, March 10, 2025. <https://www.bclplaw.com/en-US/events-insights-news/us-state-by-state-artificial-intelligence-legislation-snapshot.html>

⁶⁹ Fox-Sowell, Sophia, "Citing Risk to Kids, California Bill Targets Controversial AI 'Companion' Chatbots." *StateScoop*, July 8, 2025. <https://statescoop.com/california-sb243-harmful-ai-companion-chatbots/>

⁷⁰ Abusaif, Yasmin. "Congress Shouldn't Stop States from Regulating AI — Especially with No Alternative." *Brennan Center for Justice*, June 27, 2025. <https://www.brennancenter.org/our-work/analysis-opinion/congress-shouldnt-stop-states-regulating-ai-especially-no-alternative>

⁷¹ National Conference of State Legislatures, 2025. "Artificial Intelligence 2025 Legislation." Last modified July 10, 2025. Accessed September 30, 2025. <https://www.ncsl.org/technology-and-communication/artificial-intelligence-2025-legislation>

⁷² Teale, Chris, "Trump's AI Action Plan Targets States with 'Burdensome' Regulations." *Route Fifty*, July 24, 2025. <https://www.route-fifty.com/artificial-intelligence/2025/07/trumps-ai-action-plan-targets-states-burdensome-regulations/406949/>

AI Whistleblower Act

The Artificial Intelligence Whistleblower Act will provide explicit whistleblower protections to those developing and deploying AI platforms. This will combat the restrictive severance and nondisclosure agreements (NDAs) that currently prevent current and former employees from uncovering harms, including sexual harassment and child abuse.

Stop CSAM Act

The Strengthening Transparency and Obligations to Protect Children Suffering from Abuse and Mistreatment Act will empower victims to take action against tech companies, including AI platforms. Victims can request tech companies remove child sexual abuse material (CSAM) from their platforms. Failure to comply with a removal request may be met with an administrative penalty. It also expands protections for children who are victims or witnesses in federal court proceedings and requires big tech to submit annual reports for transparency in child protection.

AI Accountability and Personal Data Protection Act

This bill will create a federal cause of action for individuals whose personal data or copyrighted works are used by AI platforms without their consent. This will prevent AI companies from training models on personal data or copyrighted materials without consent, preventing them from creating AI chatbots that mimic real people or copyrighted fictional characters.

DEFIANCE Act

The Disrupt Explicit Forged Images and Non-Consensual Edits Act will address AI chatbot harms by creating a civil right of action for victims to seek justice. It covers AI-generated explicit materials, formerly known as deepfake pornography, that are created, distributed, or published without consent of the person depicted.

Congress has the power, and the responsibility, to ensure that the technologies shaping our children's lives are built with their safety, dignity, and futures in mind. AI chatbots are already redefining how young people learn about relationships, intimacy, and boundaries. Right now, they are teaching children that sexual harassment is the norm. We cannot afford to wait until another generation of children grows up scarred by technology. Congress must enact clear safeguards, hold companies accountable, center the rights of survivors, and work towards efficient prevention. Our children's lives depend on it.

Thank you,



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