



Protecting Children in the Age of AI

**Presentation by the Oklahoma Institute for Child Advocacy
o Interim Study 2026-44 – Impact of AI Social Companion Use on Minors**

*Addressing the creation and facilitation of nonconsensual synthetic intimate imagery
through modern accountability, enforcement authority, and victim protection.*

**Presented by The Honorable Jay Paul Gumm
Director of Communications – Oklahoma Institute for Child Advocacy**

The Emerging Threat: AI & Minors

- Artificial intelligence offers substantial economic and scientific benefits, but rapid deployment has outpaced legal safeguards.
- Generative image tools allow real photos to be manipulated with minimal effort into sexually explicit and revealing situations without consent.
- Social media integration has eliminated technical barriers, enabling instant generation and public redistribution of abusive material.
- Existing legal frameworks designed for traditional imagery fail to address automated generation and facilitator negligence.



Case Study: Grok & xAI Facilitation



Seamless Social Media Summoning

Grok, developed by Elon Musk's xAI and directly integrated into his X platform, allowed users to take ordinary public photos and command the AI to generate altered depictions in revealing clothing or explicit poses directly in the reply feed. The Internet Watch Foundation charity says its analysts have discovered "criminal imagery" of girls aged between 11 and 13 which "appears to have been created" using Grok.

Source: Associated Press Investigation & BBC

Zero-Friction Public Redistribution

Because the AI tool was natively embedded in the social network, generated images were published immediately to viral audiences without requiring external software, graphic skills, or identity verification.

Analysis of Generative Platform Architecture

Case Study: Grok & xAI Facilitation



“Urgent Patching”

Grok publicly acknowledged “lapses in safeguards” regarding the depiction of minors and rolled out software fixes to stop generation of prohibited content and created a “zero-tolerance” policy toward users seeking to bypass filters.

Source: CBC News & The Guardian

“Basic Kids Mode” – Easily Bypassed

xAI implemented a basic "kids' mode" feature and emergency patch fixes for safety lapses to make Grok safer for children, though the platform has faced severe backlash from child safety advocates due to critical failures.

Source: Digital Childhood Alliance – digitalchildhoodalliance.org

Regulatory Probes & Court Orders

Global Backlash and Legal Intervention

The AP revealed researchers discovered Grok images depicting children, prompting regulators to examine whether outputs constituted child sexual abuse material (CSAM).

Following international outcry, xAI introduced restrictions, and a Dutch court ordered xAI to immediately cease generating nonconsensual "undressing" images.

Sources: AP News (2026); Reuters Legal Reporting



Widespread Prevalence Among Minors

1 in 10

Minors Aware of Peer Deepfakes

Alarming Exposure in Schools

A landmark 2024 report by Thorn established that 10% of surveyed minors personally knew friends or classmates who used generative AI tools to create deepfake images of other children.

As commercial tools become increasingly accessible on everyday smartphones, deepfake generation has transformed from an isolated cyber crime into widespread schoolyard harassment.

Risks as Kids Turn to “Chatbot Therapy”

A growing number of children and teenagers are turning to AI-generated programs for advice, companionship and mental health support. The conversations provide instant feedback and anonymity, but sometimes, the advice offered can be wrong or even dangerous. They're unable to identify or respond to a serious mental health crisis in the same way a caring parent or a professional therapist can.

In a few cases, these AI conversations have been reportedly linked to tragic results, with young people taking their own lives.

Sources: Johns Hopkins Medicine



The Severe Harms of Synthetic Non-Consensual Intimate Imagery (NCII)



Psychological Harms

The trauma is acute even when images are fabricated. Victims experience immediate public humiliation, distress, and enduring reputational injury.



Extortion & Coercion

Perpetrators weaponize synthetic explicit photos for extortion, sextortion, and coercion, threatening wider school and community distribution.



Viral Propagation

Families struggle to scrub altered content once replicated across forums and cloud drives, causing prolonged recurring harm.

Addressing the Core Legal Gap

Individual Bad Actors

Existing criminal statutes focus primarily on the distribution of nonconsensual photos by individuals. However, pursuing individual juvenile offenders fails to stem the automated assembly line generating thousands of harmful images daily.

Platforms and Facilitators

State policy must reach the root of the crisis: commercial developers and hosting platforms that knowingly permit, market, or fail to implement guardrails against illicit generative sexualization of children.



Response from The States

State Response is Bipartisan

California: Enacted a pioneering law requiring AI chatbots to state they are not human, filter explicit content for minors, and spot signs of self-harm or suicidal thoughts.

Idaho, Oregon, and Washington: Passed laws stopping chatbots from acting like they have feelings (sentience) or having sexual talks with minors.

Tennessee: Made non-consensual AI-generated nude images and fake explicit media illegal, adding strict criminal and civil penalties. Schools must also review clear rules regarding artificial intelligence.

New York City: Announced a one-year moratorium on student-facing generative AI (such as general-purpose chatbots like ChatGPT and Claude) for grades 2-K through 8th grade for the 2026–27 school year.



Sources: CBS 8, San Diego; MultiState; Local 3, Tennessee; NYC.gov

Oklahoma's Legislative Response

A Framework for AI Reform

There have been many leaders in the effort to bring state law into line with the reality of Artificial Intelligence: **Rep. Cody Maynard, Rep. Ross Ford, Sen. Warren Hamilton, and Sen. Ally Seifried**, to name a few.

Representative Ford's proposed CS for SB 445 last session contained targeted proposals to clarify that criminal liability covers both knowingly creating or altering nonconsensual intimate images through AI and distributing them.

The proposal would empower the Attorney General's Office with direct enforcement authority while creating a civil path for victims to seek damages and mandatory takedowns of the offending material.



Balancing Innovation & Child Safety



Key Components of CS for SB 445

-  Protects Neutral AI Developers: The proposal does not penalize legitimate, general-purpose algorithms or research models operating with standard safety protocols.
-  Targets Intentional & Reckless Misuse: Liability applies specifically to entities and actors that knowingly or recklessly design, market, or facilitate tools for sexually explicit depiction of minors.
-  Enforceable Civil Redress: Provides victims and their families with immediate legal standing to seek compensatory damages and court-ordered removal of harmful content.

Americans Are Worried About AI—and Want Stronger Regulation

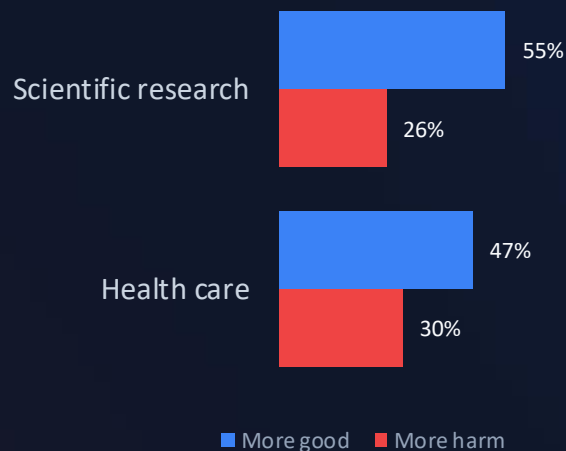
PUBLIC MOOD

Worry outweighs excitement



INSTITUTIONS

Only two areas earn optimism

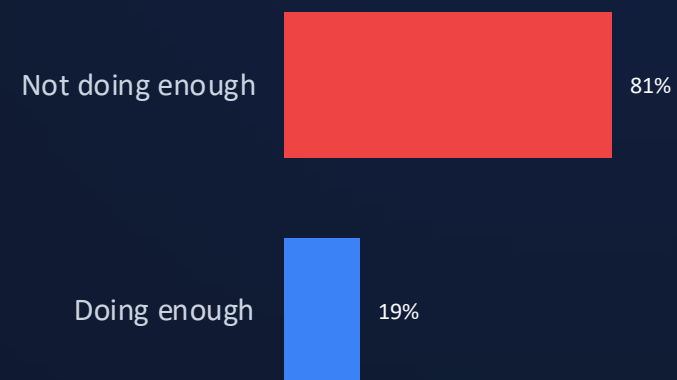


HARM LEADS IN 8 OTHER AREAS

K–12 education • Economy
News & information • Elections & democracy
Higher education • National security
Arts & entertainment • Jobs & workplace

REGULATION

Four in five want more action



81%
say Washington is not doing
enough to regulate AI

Overwhelming Voter Support in OK



This is one of those rare cases in which good policy is also good politics.

Survey of 603 likely Oklahoma Republican primary voters (March 6–8) demonstrates near-unanimous public demand for legislative and attorney general intervention.

Broad Demographic Consensus



Non-Partisan Issue

Public demand for child safety measures crosses traditional political divides, uniting conservative, moderate, and independent constituencies.



Strong Intensity

Support is exceptionally concentrated among women and rural voters across Oklahoma, who view online child safety as an urgent priority.



Clear Mandate

Lawmakers face minimal political risk in adopting clear protections—yet risk severe voter backlash if they fail to address facilitators operating with impunity.

A Rare Opportunity

Oklahoma has a rare opportunity to establish a national benchmark by closing the legal loopholes around AI-facilitated non-consensual intimate imagery (NCII), empowering the Attorney General and law enforcement, and protecting children.



Questions?

The Oklahoma Institute for Child Advocacy

Joe Dorman, CEO

2915 N. Classen Blvd., Suite 320

Oklahoma City, OK 73105

<https://oica.org>

The Honorable Jay Paul Gumm

Director of Communications

(405) 236-5437 (KIDS), Extension 1

jpgumm@oica.org