

March 27, 2025

Honorable Senator Klein and members of the Senate Commerce and Consumer Protection Committee: I write to offer written comment in support of S.F. 1119 (Senator Maye Quade). This bill would protect Minnesotans from dangerous technology. We urge the committee to advance this legislation.

As you may be aware, RAINN is the nation's largest anti-sexual assault organization. Founded in 1994, RAINN created and operates the National Sexual Assault Hotline (800.656.HOPE and hotline.rainn.org). RAINN also carries out programs to support victims, educate the public, and improve public policy.

One study of nudifying applications showed that half of them allow for images to be modified such that the victim is put into sexual scenes, which are not in the original photo. The same study showed that users could generate undressed images without confirming that the victim is 18 years old or older. Researchers at Graphika, a social network analysis firm, found that in one month of 2023 alone, over 24 million users used "Nudify" apps.¹

96% of manipulated images were non-consensual, sexually explicit, and featured women.² The creation of nonconsensual intimate imagery ruins lives. These platforms' tools destroy victims' safety, privacy, and well-being. Minnesota must act to prohibit products designed to enable image-based sexual abuse. Just as the harm presented by cocaine or child sex dolls merits outlawing them, the harm of nudification technology must be addressed now. This bill offers Minnesota the chance to lead in protecting victims and providing accountability for platforms that enable exploitation.

As such, we urge a favorable report of S.F. 1119. Thank you for your consideration and leadership.

Mollie Montague - Director of State Legislative Affairs

¹Schools face a new threat: "nudify" sites that use AI to create realistic, revealing images of classmates - CBS News, <https://www.cbsnews.com/news/schools-face-new-threat-nudify-sites-use-ai-create-realistic-revealing-images-60-minutes-transcript/>

Analyzing the AI Nudification Application Ecosystem, [2024] <https://doi.org/10.48550/arXiv.2411.09751>
AI-Generated "Undressing" Images Move from Niche Pornography Discussion Forums to a Scaled and Monetized Online Business, <https://graphika.com/reports/a-revealing-picture>
The National Intimate Partner and Sexual Violence Survey, <https://www.cdc.gov/nisvs/documentation/NISVS-2016-2017-State-Report-508.pdf>

² Journal of Digital Life and Learning 2023, Vol. 3, No. 1, 1-21 DOI: 10.51357/jdll.v3i1.218

