



Members of the House Commerce Committee,

The American Civil Liberties Union of Minnesota is an organization devoted to preserving the rights and liberties enshrined in our constitution and law.

We are writing this letter in support of HF 1606.

As the pace of technological development rapidly increases, our legislation must keep up and address the new problems that arise from technology. In the technological arena, the ACLU has always promoted a balance of public safety and collective wellbeing with the constitutionally protected civil liberties of individuals.

It's easy to see the growing harm of AI generated images on the internet. It's also easy to see the First Amendment implications of laws restricting or banning AI images. These practices are currently being litigated as it concerns explicit materials on adults and minors.

HF 1606 takes a delicate approach to the issue of Nudification technology using civil penalties and by targeting the website or software owner. This deters the use of Nudification technologies while not criminalizing individuals for what could be considered free speech.

As the use of AI grows more pervasive, legislators must straddle the fine line between protecting the public and not enacting censorship and quelling freedom of expression.

We urge the committee to support HF 1606

Munira Mohamed

Policy Associate, ACLU-MN

February 18, 2026

Honorable Representative O'Driscoll, Representative Koegel, and members of the House Commerce Finance and Policy Committee: I write to offer written comment in support of H.F. 1606 (Representatives Hansen, Bahner, and Stephenson). This bill would protect Minnesotans from dangerous technology that causes harm by creating nonconsensual intimate images. 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. Just as the harm presented by methamphetamine or child sex dolls merits outlawing them, the harm of nudification technology must be stopped. Minnesota can lead in protecting victims and providing accountability for platforms that enable exploitation.

As such, we urge a favorable report of H.F. 1606. Thank you for your consideration and leadership.

Sandi Johnson – Senior Legislative Policy Counsel

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

